



May 13, 1997

L-97-110
10 CFR 50.36

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Re: St. Lucie Unit 1
Docket No. 50-335
Use of Technical Specification Surveillance Requirement 4.0.2.

The purpose of this letter is to inform the NRC staff of Florida Power & Light Company's (FPL) plans for the cycle length of St. Lucie Unit 1 Cycle 15. Those plans include the need for exercising the 25 percent maximum allowable surveillance interval extension for Technical Specification (TS) Surveillance Requirements (SR) during that cycle.

Background

As a result of additional steam generator tube degradation identified during the Spring 1996 refueling outage (operating cycle 14), a significant number of steam generator tubes were plugged in both St. Lucie Unit 1 steam generators. This increase in the plugging of steam generator tubes, in conjunction with a steam generator "run time" analysis, resulted in FPL rescheduling the St. Lucie Unit 1 steam generator replacement/refueling outage (operating cycle 15) from Spring 1998 to Fall 1997, approximately six months earlier than originally planned. The planned outage duration of 75 days will result in a startup date for Cycle 15 of January 3, 1998.

A January 3, 1998, startup date for an 18 month cycle would result in FPL shutting St. Lucie Unit 1 down in mid-Summer 1999. However, unit shutdown for refueling in the months of June, July, or August is not desirable from an FPL grid stability or load management perspective. Accordingly, FPL is designing Cycle 15 for approximately 20 months of operation.

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Discussion

St. Lucie Unit 1 TS SR 4.0.2 states:

Each surveillance requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25% of the specified surveillance interval.

The Bases for TS SR 4.0.2 provide, in part, that the SR:

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...establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 18-month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend the surveillance intervals beyond that specified for surveillances that are not performed during refueling outages.

FPL's planned 20 months of operation is intended as a one-time extension of the nominal 18 month cycle so that St. Lucie 1 can operate during the summer months to best enhance FPL grid stability and load management. FPL has concluded that exercising the maximum allowable surveillance interval extension for 18 month SRs during the planned 20 month operating cycle following the steam generator replacement/refueling outage is consistent with the flexibility provided in TS SR 4.0.2 to accommodate the variable length of operating cycles. Although pre-planned, the provision of TS SR 4.0.2 is not being used repeatedly, nor as a convenience, to extend surveillance intervals for any surveillance not performed during a refueling outage.

FPL is currently engaged in the core reload design to support the planned cycle. As described above, FPL has concluded that the planned cycle is consistent with the provisions of TS SR 4.0.2.

Summary

FPL plans to operate St. Lucie Unit 1 for 20 months and to exercise the 25 percent maximum allowable surveillance interval extension for TS SR. As discussed with the NRC staff, we respectfully request your concurrence with our operating plan for St. Lucie Unit 1 Cycle 15 by June 16, 1997, to support the St. Lucie Unit 1 reload design activities. This letter contains no new regulatory commitments.

Very truly yours,



J. A. Stall
Vice President
St. Lucie Plant

cc: Regional Administrator, USNRC Region II
Senior Resident Inspector, USNRC, St. Lucie Plant