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SUBJECT: Informs NRC of intent of util to conduct graded review of plant FSAR.

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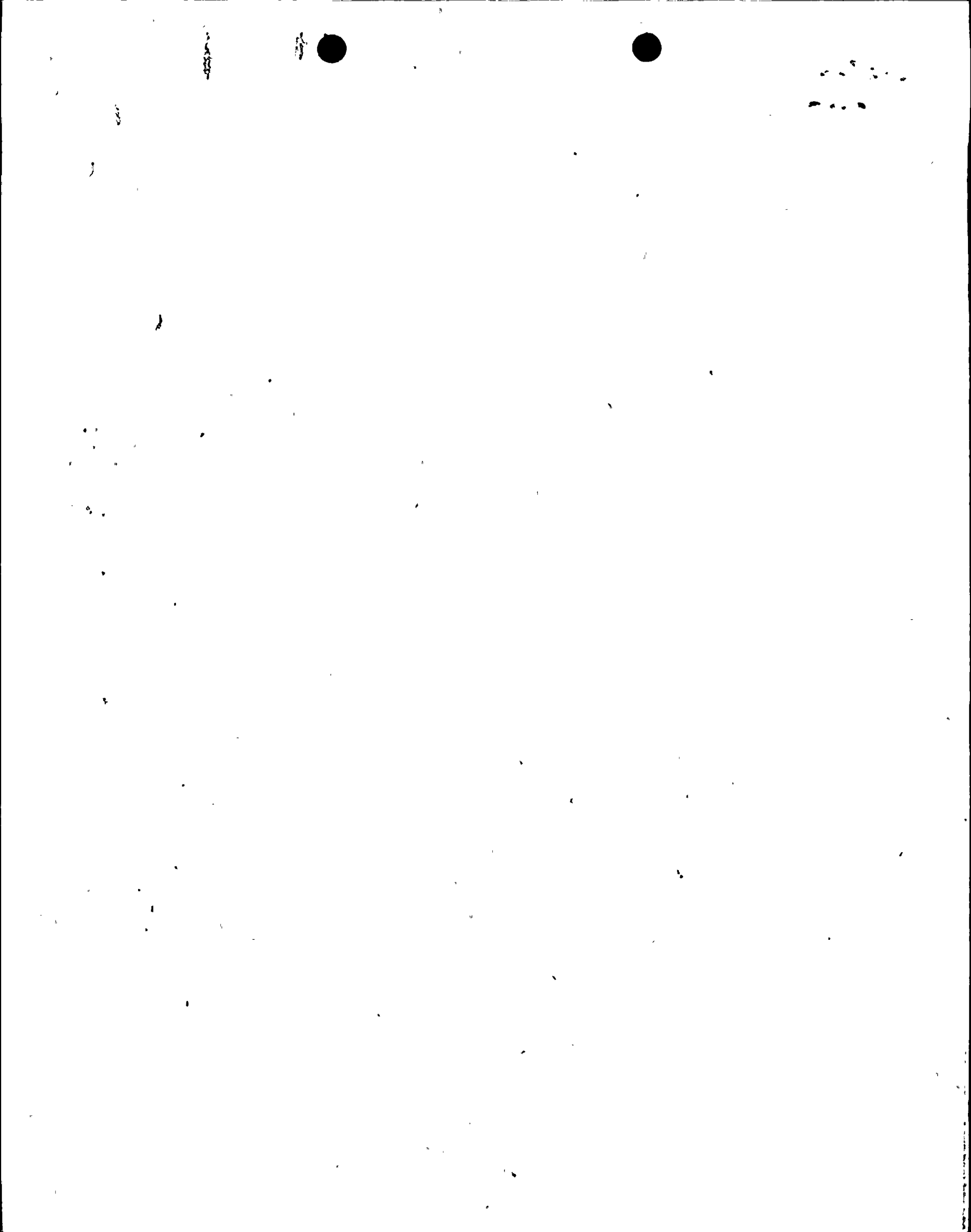
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July 11, 1997

L-97-180
10 CFR 50.4

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

Re: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Voluntary Initiative to Review
Final Safety Analysis Reports

On October 18, 1996, the NRC published revisions to its *General Statements of Policy for Enforcement Actions*, to address issues associated with departures from the Final Safety Analysis Report (FSAR) (61 FR 54461, October 18, 1996). The purpose of this letter is to inform the NRC of the intent of Florida Power and Light Company (FPL) to conduct a graded review of the St. Lucie Unit 1 and Unit 2 Final Safety Analysis Reports.

On October 9, 1996, the NRC issued a request for information under 10 CFR 50.54(f) regarding the adequacy and availability of design bases information at nuclear plants. FPL responded to this request by FPL letter, L-97-28 dated February 12, 1997, which included a brief discussion of the Nuclear Energy Institute (NEI 96-05, *Guidelines for Assessing Programs for Maintaining the Licensing Basis*) based self-assessment planned for the St. Lucie Unit 1 and Unit 2 FSARs. FPL completed this self-assessment and provided the results to NEI on April 15, 1997, including FPL's determination to perform further programmatic review of the FSARs.

St. Lucie Unit 1 and Unit 2 were originally licensed by the NRC in 1976 and 1983, respectively. The FSARs for the St. Lucie Units consist of a combined twenty-seven volumes related primarily to the operation and design of plant systems and the accident analyses. Audits and reviews conducted of the FSARs to date have found some discrepancies that are attributed to attention to detail in the use of the document and its updating. None of these discrepancies have been deemed to be safety significant or to affect operation of the St. Lucie Units. To address these discrepancies, FPL plans to perform a graded review of the FSARs. Therefore, the review effort and resources will be expended in those areas of greatest safety significance.

Significant portions of the FSARs have recently been examined as part of major inspections of the electrical distribution system, intake cooling water system, component cooling water system (Unit 2), high pressure safety injection system (Unit 2), and auxiliary feedwater system (Unit 1), and would not be expected to contain the types of discrepancies found in previous FSAR review efforts.

However, large sections of the FSARs have not been examined recently and may require more extensive review. FPL plans to prioritize this review according to risk significance (based on probabilistic safety assessment methods) of the systems described in the FSAR sections. Four priority levels have been established.

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Priority 1 sections (Unit 1 high pressure safety injection system and Unit 2 auxiliary feedwater system) will be reviewed first. Priority 2 sections (Unit 1 reactor protection system, Unit 2 reactor protection system, Unit 1 engineered safety features actuation system, Unit 2 engineered safety features actuation system, and plant fire protection system) will follow, and priority 3 sections will be reviewed last (Unit 1 safety injection tanks, Unit 2 safety injection tanks, Unit 1 low pressure safety injection system, and Unit 2 low pressure safety injection system.)

Priority 4 sections (Unit 1 power operated relief valves, Unit 2 power operated relief valves, Unit 1 heating, ventilation, and air-conditioning system, Unit 2 heating, ventilation, and air-conditioning system, Unit 1 component cooling water system, and Unit 2 high pressure safety injection system) may be reviewed pending the outcome of priority 1, 2 and 3 reviews.

In addition to the above priority reviews, many FSAR Chapter 15 accidents and events are scheduled to be updated. These updates are expected as a result of re-analysis of affected FSAR accidents and events related to changing the fuel vendor, using more limiting core physics parameters to cover future cycles of plant operation, and providing more operating flexibility to the plant.

The review of the priority 1, 2, and 3 sections will include examination of relevant system documentation (e.g., analyses, calculations, drawings, plant modifications, etc.), and walkdowns of the critical characteristics of systems. The FSAR Chapter 15 accidents and events will be updated to reflect changes in fuel design, bounding core physics parameters, Technical Specifications, plant configuration, and plant operation.

The discovery phase of the priority 1, 2, and 3 reviews is expected to be complete by October 18, 1998, however, some of the walkdowns that require access to the containment buildings may be concluded during the refueling outages in 1998 (SL2-11) and 1999 (SL1-16). The Chapter 15 FSAR updates, which require prior NRC approval, are expected to be concluded by the fourth quarter of 1999.

Please contact us if there are any questions about this submittal.

Very truly yours,



J. A. Stall
Vice President
St. Lucie Plant

JAS/GRM

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

