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SUBJECT: Requests that NRC reschedule pilot Region II Fire Protection Functional Insp to June-Jul 1998 time frame, per reasons discussed.

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

Re: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Proposed Pilot Fire Protection Functional Inspection

Florida Power & Light Company (FPL) respectfully requests that the NRC consider rescheduling the pilot Region II Fire Protection Functional Inspection (FPFI) planned for the St. Lucie Plant in March 1998. FPL proposes that NRC reschedule its St. Lucie FPFI for the June-July 1998 time frame. The reasons for requesting the inspection to be rescheduled are discussed below.

FPL was notified of the NRC's plan to conduct an FPFI at St. Lucie by NRC letter (K. D. Landis to T. F. Plunkett) dated November 7, 1997. The FPFI is planned for five inspectors for five weeks with three weeks on site. St. Lucie Unit 1 is currently in a 75 day steam generator replacement outage which, although scheduled to end on January 2, 1998, in all likelihood, will end toward the middle of January.

Performing an FPFI in March 1998 would result in St. Lucie having been the subject of three special pilot team inspections over an 18 month period. In addition, in the last 12 months, FPL will have had four separate refueling outages including the steam generator replacement outage. All of these activities coupled with the routine workload have caused our overall workload to be tightly scheduled. The preparation and support for the FPFI would add an estimated 23,500 additional man-hours, concentrated in a very short window (first quarter of 1998) and would cause a significant impact to these schedules. Some fire protection projects, discussed below, are among those impacted.

FPL has several engineering-hour significant fire protection improvements and corrective action commitments in progress. The FPFI will divert significant resources from these projects to inspection preparation and real-time inspection support. FPL estimates that 9,200 engineering man-hours of fire protection, electrical, and support resources will be required to resolve currently scheduled fire protection commitments. The most significant of these projects are summarized below:

- * Completion of non-outage related Thermo-Lag upgrades for St. Lucie Unit 2 by the end of December, 1997. (GL 92-08)
- * Completion of the Unit 1 non-outage related Thermo-Lag upgrades and modifications by the end of December, 1998. (GL 92-08)
- * Resolution of St. Lucie Units 1 and 2 penetration fire seal deficiencies by the end of December, 1998. (LER 335/97-08)

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- * Completion of the engineering for the correction of the St. Lucie Unit 2 cable tray fire stop configuration discrepancies by the end of December, 1998. (LER 389/97-04)
- * Completion of the review of the fire protection sections of the St. Lucie Unit 1 and Unit 2 Final Safety Analysis Reports by early in the first quarter of 1998. (FPL letter L-97-180)

In summary, the mid-January 1998 startup of St. Lucie Unit 1 following the steam generator replacement outage, coupled with existing fire protection commitments for the next year and the proposed first quarter 1998 FPFi, would increase the requirement for engineering resources very significantly. All of these activities would be concentrated in the already crowded first quarter of the year. Such impact on the engineering resources would almost certainly impact our ability to meet our present fire protection commitments including effective day-to-day plant support.

Therefore, considering the impact of the FPFi discussed above, and coupled with FPL's overall performance initiatives for St. Lucie Plant, the significant engineering efforts and activity for the current St. Lucie Unit 1 steam generator replacement outage, and the recent pilot team inspections at St. Lucie, FPL respectfully requests that the St. Lucie pilot FPFi be delayed until the June-July 1998 time frame.

The staff's determination on this proposal is requested in the near future, in order that engineering resources may be properly assigned and commitments changed, if required. Please contact us if further discussion on this request is required.

Very truly yours,



Thomas F. Plunkett
President
Nuclear Division

TFP/JAS/EJW

cc: Regional Administrator, USNRC, Region II
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