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 STALL, J.A. Florida Power & Light Co. *See Report*
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SUBJECT: Forwards Rev 0 to ADM-29.01, "IST Program for Pumps & Valves for St Lucie, Units 1 & 2. Attachment 1 summary of relief related IST programs.

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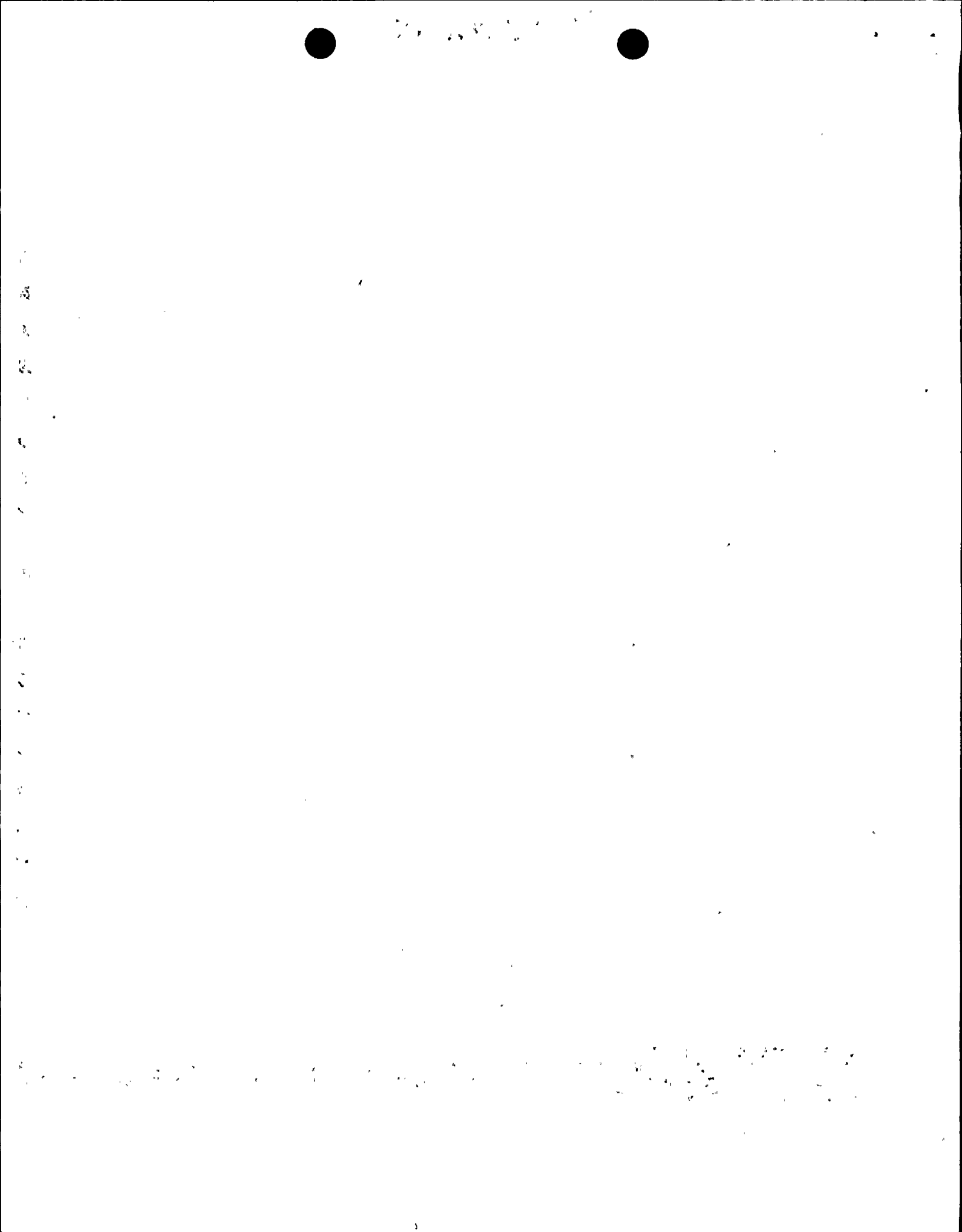
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January 12, 1998

L-98-5
10 CFR 50.4
10 CFR 50.55a

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
Third Ten-Year Interval
In-Service-Test Program - Revision 0

The third ten-year in-service-test (IST) interval for St. Lucie Unit 1 begins on February 12, 1998, and ends on February 11, 2008. Pursuant to 10 CFR 50.55a(f)(4)(ii) and 10 CFR 50.55a(b)(2)(viii), the enclosed program outlines the IST plans for St. Lucie Units 1 and 2 based on the requirements of Section XI of the ASME Boiler and Pressure Vessel Code (ASME Code), 1989 Edition and the applicable requirements set forth in ASME/ANSI OM-1987, *Operation and Maintenance of Nuclear Power Plants*, including ASME/ANSI OMa-1988 Addenda. This submittal combines the Unit 1 and Unit 2 IST Programs into a single program and plant administrative procedure updating both programs to the later Code requirements. Pursuant to 10 CFR 50.55a(f)(4)(iv), the St. Lucie Unit 2 IST Program for the second ten-year IST interval is being voluntarily upgraded from the requirements of the ASME Code, Section XI, 1986 Edition to the ASME Code, Section XI, 1989 Edition and the applicable requirements set forth in ASME/ANSI OM-1987, *Operation and Maintenance of Nuclear Power Plants*, including ASME/ANSI OMa-1988 Addenda by this revision.

Incorporated in this submittal, for your review and approval, are relief requests associated with the Unit 1 third ten-year IST interval and the relief requests associated with the upgrade of the Unit 2 IST Program. Attachment 1 is a summary of the relief requests related the IST Programs.

Attachment 2 is the implementation plan for the combined IST Program. For St. Lucie Unit 1, the first refueling outage for the new IST interval and new outage-related program requirements or testing will be the Fall 1999 refueling outage (SL1-16). For St. Lucie Unit 2 the first refueling outage for the new outage-related program requirements or testing is planned to be the Fall 1998 refueling outage (SL2-11).

FPL is submitting Revision 0 of the St. Lucie Units 1 and 2 IST Program Plan for Pumps and Valves, ADM-29.01, for your information as required by IWA-1400(c). This revision, when implemented, will replace individual unit specific IST program procedures, AP 1-0010024 and

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AP 2-0010024, with a single administrative procedure. Since all previous IST Program commitments were reviewed and incorporated, as appropriate, in the updated programs, all previous IST commitments are superseded by this document.

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

RELIEF REQUEST SUMMARY SHEET (PUMPS)						
RELIEF REQUEST/ UNIT	ISSUE/COMPONENTS	PRIOR RELIEF REQUEST UNITS 1&2 (1)	PRIOR APPROVAL/ SER DATE UNIT 1	PRIOR APPROVAL/ SER DATE UNIT 2	IMMED. UPDATE PLANED (2)(3)	PRE-APPROVAL REFERENCE (3)
PR-01/1&2	Pump speed measurement instrumentation (AFW & Hydrazine)	PR-2	2-26-92	5-2-94	YES	N/A
PR-02/1&2	Min-flow testing AFW pumps	PR-4		5-2-94	YES	GL 89-04, Position 9
PR-03/1&2	Min-flow testing BAM pumps	PR-5	9-27-94	5-2-94	YES	GL 89-04, Position 9
PR-04/1&2	Min-flow testing containment spray pumps	PR-6		5-2-94	YES	GL 89-04, Position 9
PR-05/1&2	Min-flow testing HPSI pumps	PR-9		5-2-94	YES	GL 89-04, Position 9
PR-06/1&2	Min-flow testing LPSI pumps	PR-10		5-2-94	YES	GL 89-04, Position 9
PR-07/1&2	Reactor coolant charging pumps vibration measurements	PR-12	8-5-94	8-23-93/5-2-94	YES	
PR-08/2	Hydrazine pumps vibration measurements	PR-14		8-23-93/5-2-94	YES	
PR-09/2	Hydrazine pumps flowrate measurements	PR-17		8-23-93/5-2-94	YES	
PR-10/1&2	EDG fuel oil pumps testing frequency				YES	
PR-11/G	Generic - evaluation of pump test data vs. maintenance or repair				NO	

NOTES:

- (1) Prior approved relief request is substantially the same as current submittal.
- (2) Impractical requirement due to limitations of design, construction, or system configuration as defined by 10CFR50.55a(a)(3)(ii). The proposed alternate testing may be implemented upon submittal in lieu of applicable Code requirement without further approval unless otherwise directed. (Ref. NUREG-1482, Section 6)
- (3) Alternate testing of pre-approved relief requests may be implemented upon submittal in lieu of applicable Code requirement.

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RELIEF REQUEST SUMMARY SHEET (VALVES)							
RELIEF REQUEST/ UNIT	ISSUE/COMPONENTS	PRIOR RELIEF REQUEST UNIT 1 (1)	PRIOR RELIEF REQUEST UNIT 2 (1)	SER DATE UNIT 1	SER DATE UNIT 2	IMMED. UPDATE (2)(3)	PRE-APPROVAL REFERENCE (3)
VR-01/G	Generic - Safety valve temperature stability during testing					YES	
VR-02/G	Generic - Safety valve temperature compensation					YES	
VR-03/G	Generic - Safety valve test accumulator volume requirements					YES	
VR-04/1&2	Safety injection system check valve closure testing					NO	
VR-05/1&2	Safety injection system check valves - alternate testing or inspection	VR-12	VR-13			YES	GL 89-04, Pos 1 NUREG 4.1.2
VR-06/1&2	Safety injection system check valves - alternate testing or inspection	VR-13	VR-14			YES	GL 89-04, Pos 1&2 NUREG 4.1.2
VR-07/1	Main Steam line check valves - inspection vs. closure testing	VR-14		2-26-92		YES	GL 89-04, Pos 2
VR-08/1&2	Main Steam to AFW check valves - inspection vs. closure testing	VR-40	VR-31	9-27-94	5-2-94	YES	GL 89-04, Pos 2 NUREG App. A
VR-09/1	Main Steam to AFW check valves - inspection vs. closure testing	VR-41		9-27-94		YES	GL 89-04, Pos 2 NUREG App. A
VR-10/1	Main Feedwater supply check valves - inspection vs. closure testing	VR-38				YES	GL 89-04, Pos 2
VR-11/1&2	AFW mini-flow check valves - inspection vs. open testing	VR-31	VR-27		5-2-94	YES	NUREG 4.1.1, App2
VR-12/1&2	Instrument air check valves - series testing						
VR-13/1&2	EDG fuel oil transfer pump discharge check valves - deferred open test						
VR-14/1&2	RWT outlet check valves - inspection vs. full-stroke testing	VR-17	VR-20		5-2-94	YES	GL 89-04, Pos 2 NUREG App. A
VR-15/1	Cont. spray eductor check valves - inspection vs. full-stroke testing	VR-22		9-17-93			GL 89-04, Pos 2 NUREG App. A
VR-16/1&2	Cont. sump check valves - inspection vs. full-stroke testing	VR-19	VR-22		5-2-94	YES	GL 89-04, Pos 2 NUREG App. A

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RELIEF REQUEST SUMMARY SHEET (VALVES)							
RELIEF REQUEST/ UNIT	ISSUE/COMPONENTS	PRIOR RELIEF REQUEST UNIT 1 (1)	PRIOR RELIEF REQUEST UNIT 2 (1)	SER DATE UNIT 1	SER DATE UNIT 2	IMMED. UPDATE (2)(3)	PRE-APPROVAL REFERENCE (3)
VR-17/1&2	Cont. spray header check valves - inspection vs. full-stroke testing	VR-20	VR-23		5-2-94	YES	GL 89-04, Pos 2 NUREG App. A
VR-18/1&2	EDG system valves (various) - deferred testing schedule						
VR-19/1&2	Containment vacuum breaker testing						
VR-20/1&2	NAOH/Hydrazine tank vacuum breaker testing						

NOTES:

- (1) Prior approved relief request is substantially the same as current submittal.
- (2) Impractical requirement due to limitations of design, construction, or system configuration as defined by 10CFR50.55a(a)(3)(ii). The proposed alternate testing may be implemented upon submittal in lieu of applicable Code requirement without further approval unless otherwise directed. (Ref. NUREG-1482, Section 6)
- (3) Alternate testing of pre-approved relief requests may be implemented upon submittal in lieu of applicable Code requirement.

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IMPLEMENTATION PLAN

Generic Letter 89-04, Supplement 1, *Guidance on Developing Acceptable IST Programs*, dated April 4, 1995, granted "Commission approval" pursuant to 10 CFR 50.55a(f)(4)(iv) to allow implementation of specific portions of the 1989 Edition of the ASME Code incorporated in 10 CFR 50.55a(b) provided the implementation is consistent with NUREG-1482, *Guidelines for IST at Nuclear Power Plants*, dated April 1995.

The current Technical Specifications require that the IST Program "...be performed in accordance with Section XI of ASME B&PV Code and applicable Addenda as required by 10 CFR 50.55a(g) [since changed to 10 CFR 50.55a(f)], except where specific written relief has been granted by the Commission..." Therefore, FPL is prohibited from implementing any portion of the 1989 Edition of the ASME Code for a valve or pump where specific relief from a Code requirement is needed.

Unlike the current Technical Specifications, the Improved Standard Technical Specifications (ISTS), NUREG 1432, do not require preapproval of relief requests. FPL submitted a Proposed License Amendment (PLA) by FPL Letter L-97-215 dated August 22, 1997, to adopt the ISTS wording. Consequently, after this PLA is approved, FPL will be able to implement relief requests as allowed by 10 CFR 50.55a. Specifically, 10 CFR 50.55a(f)(5)(iv) allows up to one full year following implementation of each relief request to demonstrate that a Code requirement is impractical.

Where relief is required, the updated IST Program requirements will not be fully implemented and the old requirements will not be deleted until one of the following actions is completed by the NRC:

The Proposed License Amendment, *Pump and Valve IST Program*, submitted by FPL Letter L-97-215 dated August 22, 1997, is approved.

Relief requests for specified testing in the combined St. Lucie Unit 1 and Unit 2 IST Program are approved.

Unit 1 Implementation

Assuming either the Proposed License Amendment, *Pump and Valve IST Program*, submitted by FPL Letter L-97-215 dated August 22, 1997, or the specific relief requests are approved no later than the starting date for the third ten-year interval (February 12, 1998), all Unit 1 implementing surveillance test procedures and the IST administrative procedures will be implemented prior to August 11, 1998 and any testing performed subsequent to August 11, 1998 will be performed in accordance with the new Code requirements.

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Testing performed during cold shutdown periods and refueling outages after August 11, 1998, will be conducted in accordance with the new Code requirements. Completion of any new testing performed during cold shutdown will be completed during first the cold shutdown following August 11, 1998 that time and circumstances permit.

Any Unit 1 IST testing requirements identified in this revision of the program for newly added components that can only be performed during refueling or cold shutdown periods have been performed during the Fall 1997 refueling/steam generator replacement outage (SL1-15).

Unit 2 Implementation

Assuming either the Proposed License Amendment, *Pump and Valve IST Program*, submitted by FPL letter L-97-215 dated August 22, 1997, or the specific relief requests are approved no later than February 12, 1998, all IST surveillance test procedures implementing the new ASME Code requirements will be revised as required and implemented prior to the end of the next refueling outage (SL2-11) currently scheduled for the Fall 1998.

Any new Unit 2 IST Program tests that can only be performed during a cold shutdown or refueling outage will be performed during the Fall 1998 Unit 2 refueling outage (SL2-11).