

CATEGORY 1

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ACCESSION NBR: 9805280163 DOC. DATE: 98/05/21 NOTARIZED: NO DOCKET #
FACIL: 50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co. 05000335
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SUBJECT: Provides comments on 980423 preliminary ASP analysis which documented ASP program review of operational condition discovered at St Lucie, Unit 1 on 971107.

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May 21, 1998

L-98-133
10 CFR 50.4

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

RE: St. Lucie Unit 1
Docket No. 50-335
LER 335/97-011
Comments on Preliminary
Accident Sequence Precursor Analysis

On April 23, 1998, the NRC issued the subject preliminary analysis for comment. The report documented the accident sequence precursor (ASP) program review of an operational condition which was discovered at St. Lucie Unit 1 on November 7, 1997, and reported in Licensee Event Report (LER) 335/97-011. Specifically in January 1993, an engineering calculation was revised to identify a new set point for the refueling water tank (RWT) level instruments and bistable for St. Lucie Unit 1. Florida Power & Light Company (FPL) failed to correctly translate this design change into all affected procedures. As a result of a questioning attitude by an FPL reactor operator and system engineer in early November 1997, it was determined that instructions had not been provided to change a specific calibration procedure to reflect the revised set point information.

The subject preliminary ASP analysis assesses the estimated conditional core damage probability (CCDP) associated with the non-conservative recirculation actuation signal (RAS) set point. It was determined that the unit was more susceptible to core damage in the event of a large-break-loss-of-coolant-accident (LBLOCA) since changing the span of the RWT level indication during 1993. The NRC estimated the nominal core damage probability (CDP) for this event over a 1-year period due to the improper RAS set point as $1.7E-5$. Hence, the NRC estimated the less conservative RAS set point results in an estimated CCDP for a 1-year period of operation of $3.4E-5$. Uncertainty in the frequency of a LBLOCA (none have occurred) and the uncertainty in the amount of emergency core cooling system (ECCS) flow required when recirculation is initiated contribute to substantial uncertainty in this estimate.

FPL appreciates the opportunity to review the draft ASP analysis. The following summarizes the conclusions of our review.

FPL requests that the Event Summary Section of Enclosure 1 of the NRC transmittal be revised to change the estimated CCDP for 1-year of operation from $3.4E-5$ to $2.3E-5$. This value is correctly calculated with more realistic assumptions stated in the last two sentences on page 4 of NRC

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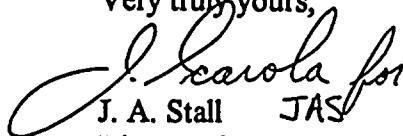
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Enclosure 1. Additionally, FPL notes that:

1. There maybe some unquantifiable conservatism in the assumptions and the human error probability in the AEOD study. This is identified in the sensitivity analysis of the AEOD study and is reasonable.
2. The probability of "Operator fails to initiate recirculation" was estimated to be 1.2 E-1 . This is a factor of two times our estimated number of 6.0E-2 , but within the bounds of uncertainty.
3. The probability of "Operator fails to secure spray pumps" was estimated to be 5.2E-1 , assuming that this action is rule-based, but with hesitancy, because conditions to secure the spray pumps are not met immediately. This value appears to be high when compared to the simulator run and more detailed consideration of the emergency operating procedure (EOP). FPL believes that the value of 1.9E-1 used in the sensitivity study is a more reasonable representation.
4. Based on our simulator run and the more detailed review of the EOP, we believe that the CDDP of 2.3E-5 is a more realistic estimate.

Please contact us if there are any questions about these comments.

Very truly yours,



J. A. Stall JAS
Vice President
St. Lucie Plant

JAS/GRM

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