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POST OFFICE BOX 128, FT. PIERCE, FLORIDA 33450

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FLORIDA POWER & LIGHT COMPANY

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To: Mr. J. P. O'Reilly, Director Region II
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Atlanta, Georgia 30303

May 15, 1980

From: Mr. C. M. Wethy, Plant Manager
St. Lucie Plant - DPR 67
Florida Power & Light Company
Miami, Florida

Subject: MEMO FOR FACSIMILE TRANSMISSION TO CONFIRM 10 CFR PART 21 PROMPT REPORTABLE OCCURRENCE 335-80-27

Operation in Mode 5 with partially drained Reactor Coolant System.

This memo is to confirm a telephone call on May 14, 1980 to Mr. Steve Elrod of your office.

Event: On May 14, 1980, Florida Power and Light was informed by the St. Lucie Unit 1 NSSS supplier, Combustion Engineering, that partial draining of St. Lucie 1 type Reactor Coolant Systems while in Mode 5 is a condition that has not been analyzed for the boron dilution event. The effect of the reduced RCS volume on Combustion Engineering's analysis would be a predicted time to criticality that is less than the minimum time period for operator action, assuming no more than the Technical Specification (T.S. 3.1.1.2) shutdown margin of 1% $\Delta\rho$ existed at the onset of the event.

Corrective Action:
In accordance with the NSSS supplier's recommendations, Florida Power & Light has revised plant operating procedures to:

a) increase the shutdown margin when partially drained in mode 5 by an additional 1% $\Delta\rho$ above the existing Tech Spec required shutdown margin of 1% $\Delta\rho$, ensuring at least 20 minutes to elapse before criticality, and

b) preclude operation with more than two charging pumps running while in mode 5.

C. M. Wethy
Plant Manager
St. Lucie Plant

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