FLORIDA POWER & LIGHT COMPANY

April 24, 1981

REVIEWED BY:

Mr. James P. O'Reilly, Director, Region II
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: St. Lucie Unit 1
Reportable Occurrence 335-81-19

We reported to you on April 10, 1981 a prompt notification expressing our concern regarding analyses utilizing licensing (FSAR) assumptions for certain postulated accidents (Main Steam Line Break, Steam Generator Tube Rupture, Excess Load) which used the assumption that RCP's are tripped upon receipt of SIAS and that auxiliary feedwater is automatically intiated. Both assumptions resulted from changes to the plant as mandated by the NRC.

Following a preliminary review within the time constraints of T.S. 6.9.1.8.h, we opted to notify your office via telephone and facsimile confirmation (LER 335-81-19) in accordance with the prompt notification requirements of T.S. 6.01.1.8h. Upon further review and a more detailed evaluation by our NSSS vendor we have since determined that this item is not a reportable safety concern due to the following:

1. Plant specific analysis were performed for St. Lucie 1 to establish that there is no need to environmentally qualify the RCP's. This was done in connection with NRC Bulletin 79-01B on environmental qualification. These analyses included tripping of the RCP's on SIAS and automatically initiated auxiliary feedwater with a 3 minute time delay. The results of this work credited certain realistic assumptions (such as isolation of the main feedwater in 25 seconds following reactor trip and partial credit for negative void reactivity feedback effects). However, all other input data was conservatively based on standard licensing assumptions. The results of these analyses showed that all existing analytical Design Basis Criteria are met.

2. Analyses based on best estimate input parameters were done in connection with revised Post-LOCA Guidelines. These analyses lead to the same conclusions noted above.

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2. Analyses based on best estimate input parameters were done in connection with revised Post-LOCA Guidelines. These analyses lead to the same conclusions noted above.

3. Analyses submitted in support of licensing Calvert Cliffs Unit 1 Cycle 5 and Unit 2 Cycle 4 included the post TMI requirements noted above. Although it was necessary to utilize Cycle specific input data for the Steam Line Break analyses presented in these submittals, the analyses clearly demonstrate acceptable results. The NRC concurred in these conclusions in their SER's for the two Calvert Cliffs license submittals. Based on comparisons between St. Lucie 1 and Calvert Cliffs 1 data, C-E is convinced that utilizing cycle specific (instead of enveloping) data for St. Lucie 1 will produce comparable results and conclusions.

Very truly yours,

for A. D. Schmidt
Vice President
Power Resources

ADS/JEM/mbd

Attachment

cc: Harold F. Reis, Esquire