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March 12, 1986  
L-86-106

Dr. J. Nelson Grace  
Regional Administrator, Region II  
U. S. Nuclear Regulatory Commission  
101 Marietta Street, N. W., Suite 2900  
Atlanta, Georgia 30323

Dear Dr. Grace:

RE: St. Lucie, Units 1 and 2  
Docket Nos. 50-335, 50-389  
Inspection Report 335/85-36 and 389/85-36

Florida Power & Light has reviewed the subject inspection report and a response is attached.

We have given the finding contained in the report, serious consideration and have determined that we do not concur with it as stated. We respectfully request your reconsideration of the finding. We are available at your convenience to discuss our response.

The report and the attached response contains no proprietary information.

Very truly yours,

A handwritten signature in cursive script, appearing to read "C. O. Woody".

C. O. Woody  
Group Vice President  
Nuclear Energy

COW/SAV/eh

Attachement

cc: Harold F. Reis, Esquire  
File: PNS-LI-86-74

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## ATTACHMENT

Re: St. Lucie Unit 1 and 2  
Docket Nos. 50-335, 50-389  
Inspection Report 335/85-36 and 389/85-36

### FINDING

Unit 1 Technical Specification (TS) 3.4.1.4.2 requires that two shutdown cooling loops be operable when in mode 5 with the reactor coolant loops not filled.

Contrary to the above, on October 28, 1985 two shutdown cooling loops were not operable in that train "B" of Component Cooling Water (CCW) was not capable of removing heat from the respective loop of shutdown cooling. The train "B" CCW heat exchanger was disassembled and incapable of rejecting heat to the intake cooling water system.

### RESPONSE

1. FPL does not concur that a violation took place as stated in the subject report:

A review of the circumstances indicates that specification 3.4.1.4.2 requires two shutdown cooling loops be operable while in Mode 5 with the reactor coolant loops not filled. These loops, as interpreted by FPL, consist of two LPSI pumps and two shutdown cooling heat exchangers. At all times, cooling water (component cooling water or CCW) was provided to both shutdown cooling heat exchangers; therefore, FPL considers two shutdown cooling loops were operable as both were being supplied cooling water from a fully operable CCW system with emergency diesel power available.

To support the above, as meeting the current Technical Specifications, Florida Power and Light offers the following supporting information:

- a. The "A" train CCW heat exchanger was in continuous operation throughout the time in Mode 5, and the heat removing capabilities of this single heat exchanger exceeded the CCW cooling



requirements, and therefore, the shutdown cooling requirements of Mode 5 operations.

Plant drawings show that the CCW pumps discharge to a common header, and that flow is directed to the CCW A and B heat exchangers by the opening and closing of motor-operated valves in this header. Discharge flow from the CCW heat exchangers is directed to two more common headers which link the A and B essential trains and the N or nonessential train of the system.

Again, flow to the different trains is directed by the opening and closing of valves in the common header. This ease of flow direction, from one heat exchanger to another and from one train to another, is a function of one of the basic design parameters of this system: the CCWS is capable of providing sufficient cooling capacity to cool reactor coolant system components and auxiliary systems components with two pumps and one CCW heat exchanger in operation. This specifically allows maintenance to be performed on the CCW system while in Modes 5 and 6.

The Unit I FUSAR Section 9.3.5.3.2 makes it clear that the shutdown cooling system was not designed or licensed to withstand passive failures. If certain passive failures were to occur, core cooling and safety can be provided by other diverse and alternate systems and methods (pp. 9.3-47 and -48).

- b. The capability to cool the core was not in jeopardy at any time even with a postulated loss of intake cooling water (ICW) or CCW. A large inventory of water was always available (RWT or refueling cavity) and sufficient makeup capability existed to provide adequate core cooling.

Based upon this and item 1a. above, there is no safety issue associated with the alleged violation.

- c. No specific requirement exists in the current Technical Specifications or the existing NRC Standard Technical Specifications for CCW or intake cooling water in Modes 5 and 6. The intent of the OPERABILITY definition is met by ensuring CCW and ICW are available and capable of being supplied from an emergency power source.

- d. The intent of ensuring the operability of support equipment is to ensure that the specified equipment will perform its intended function; if the support equipment has its own limiting condition for operation (LCO), then that becomes the governing requirement. This was clearly established by precedent in previous years when it was necessary to clarify the emergency power source requirements for both trains of equipment in Modes 5 and 6 when the diesel generator specification required only one diesel in these modes.
- e. Based on existing specifications it cannot be assumed that because two shutdown cooling loops are required; two loops of all other associated systems are required unless specifically excluded. In some instances, current specifications require multiple pumps but only a single source of water.
- f. Since the initial issuing of the Unit I Technical Specifications, the clear intent of the surveillance requirement is to ensure that the LCO is met. Recent editorial changes to this paragraph in the technical specifications do not reduce this clear meaning.

2. Not applicable

3. Not applicable

4. To ensure appropriate controls are placed on the CCW/ICW systems during conditions required to support the shutdown cooling system, FPL will describe the extent of support system work that may take place when these systems are required.

5. It is expected that the above instruction will be completed by April 10, 1986.