



JUL 22 1986

L-86-300

Mr. Roger D. Walker  
Acting Deputy Regional Administrator  
U. S. Nuclear Regulatory Commission  
101 Marietta Street, N.W., Suite 2900  
Atlanta, Georgia 30323

Dear Mr. Walker:

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

Florida Power and Light Company (FPL) has reviewed the NRC letter dated June 19, 1986 from Region II, conveying the NRR/Region II interpretation of FPL's response to the subject report. After serious consideration, FPL does not concur that a violation of the Unit 1 Technical Specifications has taken place.

FPL notes that the June 19, 1986 letter states that redundancy is required "for protection against single failures..." This letter also states that the redundant B train CCW heat exchanger should have been operable to satisfy this single failure requirement. Heat exchangers are passive rather than active components; Footnote 2 of the Definitions and Explanations Section of 10 CFR 50 Appendix A states that the criteria for assessment of single failures of passive components in fluid systems are still under development. FPL is not aware that such criteria currently exist. The ANS criteria for Technical Specifications for Nuclear Power Stations, ANS/58.4-1979, delineation of criteria for fluid systems, does not assume failures of passive components.

Reference has also been made to the June 11, 1980 letter from Darrell G. Eisenhut. FPL notes that a follow-up letter dated December 21, 1982, from D. E. Sells to R. E. Uhrig, documents FPL's satisfactory compliance with the requests transmitted by the June 11 letter. The December 21 letter states that "...with the enactment of (T.S. Amendment 56), an additional (shutdown cooling) system would be maintained in an operable status, should an unforeseen event occur which renders the operating system inoperable. Therefore, (the staff found) the proposed amendment acceptable." FPL notes that the subject violation report discusses the intent of this particular specification; however, the intent of the June 11, 1980 letter was clearly met by Amendment 56 of Specification 3.4.1.4.2 to the satisfaction of the NRC Staff. If, in fact, the intention of the shutdown cooling specification is to require the CCW and ICW systems, then the Technical Specifications should have a special mode application for these systems for the appropriate RCS water level conditions.

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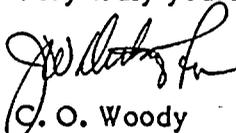
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FPL views this proposed violation as a question of interpretation of LCO's surveillance requirements, and the definition of operability. It has been the practice to read the mode applicability for a specific system or component and then apply the operability definition to the supporting equipment, noting that the operability definition makes no mention of redundancy. If the supporting equipment does not have an LCO requirement for that particular mode, then only the portion necessary for support is considered.

If a specific LCO exists addressing the supporting equipment (e.g., diesels, snubbers, hangers, instruments, etc.), then the LCO applies to that supporting equipment. As evidenced by the proposed violation, it appears to be the opinion of the Staff that the definition of operability supersedes all mode applicabilities for all equipment. FP&L suggests that this should not be the case; the LCO should be the over-riding condition for operation, with the operability statement functioning within the parameters of mode applicability as defined by the LCO's. Any other interpretation renders compliance with Technical Specifications difficult to determine and subject to constant review with uncertain results.

In conclusion, FPL notes that the surveillance requirements of Technical Specification 3.4.1.4.2 were met, as were the existent LCO's for all attendant support systems. FPL notes that all valid concerns of the NRC Staff as addressed in the June 11, 1980 and June 19, 1986 letters have been satisfactorily answered by the Company. If the staff feels that it is necessary to clarify the Technical Specifications for CCW/ICW, FPL would of course be willing to address that issue.

Very truly yours,



C. O. Woody  
Group Vice President  
Nuclear Energy

COW/SAV/cac

cc: Harold F. Reis, Esquire  
PNS-LI-86-218

11

