



May 1, 1980
L-80-135

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: RII:VLB
50-250/79-35
50-251/79-35
50-335/79-33
50-389/79-22

This letter supplements Florida Power & Light Company's letter of March 21, 1980 (L-80-100) in response to the subject inspection report. As stated in our previous response, procedures will be revised by June 30, 1980. Our further review of this matter indicates that additional time will be needed to train people in the implementation of these procedures. Thus full compliance will be achieved by July 31, 1980 instead of June 30, 1980 as stated in our previous letter.

By October 31, 1980, all reports submitted to the NRC pursuant to 10 CFR 50.55(e) and Facility Technical Specifications (LER's) between August 10, 1977 and July 31, 1980 will be reviewed against the criteria specified in 10 CFR 21 paragraphs 21.3(d) and 21.3(k), and those meeting the criteria of 10 CFR 21 paragraphs 21.3(d) and 21.3(k) will be reported in accordance with 10 CFR 21 paragraphs 21.21(a) (2) and 21.21(b).

As discussed with members of your staff, Florida Power & Light Company does not agree that 10 CFR 21 requires evaluations of reports made to the NRC pursuant to 10 CFR 50.55(e) and Facility Technical Specifications (LER's). Although we do not agree with your interpretation of this regulation, evaluations will be implemented as stated above to be in compliance with your understanding of the requirements of the regulation.

Very truly yours,

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/GDW/ah

cc: Harold F. Reis, Esquire-
Robert Lowenstein, Esquire
Darrell G. Eisenhut

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