NRC FORM 195 (2-76)

U.S. NUCLEAR REGULATORY COMMISSION

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DOCKET NUMBER: 50-335

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TO: Mr. Stello

FROM: FPL
Miami, Fl. 33101
Robert E. Uhrig

DATE OF DOCUMENT: 03-18-77

DATE RECEIVED: 03-29-77

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DESCRIPTION

Ltr. Notorized 03-18-77...Trans The Following:

(6 pages)

DO NOT REMOVE

PLANT NAME: ST LUCIE UNIT # 1

jcm

~~ACKNOWLEDGED~~

ENCLOSURE

Amd't to OL/Change to Tech Specs: Consisting of revisions regarding Appendix A concerning the proposed pump and valve testing program...With Attachments "A" & "B"...!

(1/2" thick)

(see corresponding jacket)

(33 cys encl'l rec'd, 4 Destroyed in shipment)

3 ADVANCE CY's Rec'd 3/24/77

FOR ACTION/INFORMATION

SAFETY		ENVIRO
ASSIGNED AD:		ASSIGNED AD:
BRANCH CHIEF:	Ziemann (2)(3 ADV)	BRANCH CHIEF:
PROJECT MANAGER:	Reeves	PROJECT MANAGER:
LIC. ASST.:	Diggs	LIC. ASST.:

INTERNAL DISTRIBUTION

REG FILE	SYSTEMS SAFETY	PLANT SYSTEMS	SITE SAFETY &
NRC PDR	HEINEMAN	TEDESCO	ENVIRO ANALYSIS
I & E (2)	SCHROEDER	BENAROYA	DENTON & MULLER
OELD Ltr		LAINAS	
GOSSICK & STAFF Ltr	ENGINEERING	IPPOLITO	ENVIRO TECH.
MIPC	MACARRY	KIRKWOOD	ERNST
CASE	BOSNAK		BALLARD
HANAUER	SIHWEIL	OPERATING REACTORS	YOUNGBLOOD
HARLESS	PAWLICKI	STELLO	
			SITE TECH.
PROJECT MANAGEMENT	REACTOR SAFETY	OPERATING TECH.	GAMMILL
BOYD	ROSS	EISENHUT	STEPP
P. COLLINS	NOVAK	SHAO	HULMAN
HOUSTON	ROSZTOCZY	BAER	
PETERSON	CHECK	BUTLER	SITE ANALYSIS
MELTZ		GRIMES	VOLLMER
HELTEMES	AT & I		BUNCH
SKOVHOLT	SALTZMAN		J. COLLINS
	RUTBERG		KREGER

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TIC:	REG V.IE.	ULRIKSON (ORNL)
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ASLB:	CONSULTANTS:	
ACRS 16 CYS ~~HOLDING~~/SENT	As CAT B	

AP 2 GD

NRC FORM 195 (2-76)

P. O. BOX 013100, MIAMI, FL 33101

FLORIDA POWER & LIGHT COMPANY

March 18, 1977
L-77-88

Director of Nuclear Reactor Regulation
Attn: Victor Stello, Jr., Director
Division of Operating Reactors
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Stello:

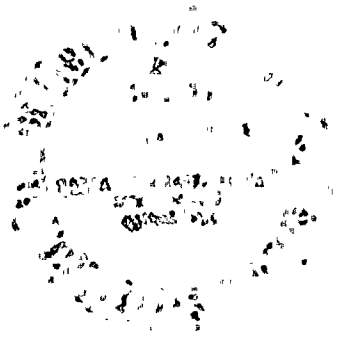
Re: St. Lucie Unit 1
Docket No. 50-335
Proposed Amendment to
Facility Operating License DPR-67

In accordance with 10 CFR 50.30, Florida Power & Light Company submits herewith three (3) signed originals and forty (40) copies of a request to amend Appendix A of Facility Operating License DPR-67.

This letter concerns the proposed pump and valve test program and associated Technical Specifications for St. Lucie Unit 1. The proposed Technical Specification changes are described below and shown on the accompanying Technical Specification pages (Attachment A) bearing the date of this letter in the lower right hand corner. The proposed pump and valve testing program is described in Attachment B.

The following Specifications are added, revised, or deleted to conform with the proposed pump and valve testing program.

Specification	Page	Remarks
1.21 (revised)	1-5	Definition 1.21 (Staggered Test Basis) is not applicable to components tested per the applicable ASME Code and Addenda.
4.0.5 (added)	3/4 0-2	New Specification 4.0.5 is added to specify the pump and valve test requirements.
4.1.2.1.a.1 (deleted)	3/4 1-8	Boration Systems - Shutdown Flow Paths: cycling of power operated or automatic valves.



Specification	Page	Remarks
4.1.2.2.a.1 (deleted)	3/4 1-10	Boration Systems - Operating Flow Paths: cycling of power operated or automatic valves.
4.1.2.2.c.1 (deleted)	3/4 1-11	Boration Systems - Operating Flow Paths: cycling of power operated valves not testable during plant operation.
4.1.2.3.a, b, & c (revised)	3/4 1-12	Boration Systems - Charging Pump (shutdown): charging and HPSI pump tests.
4.1.2.4.a & b (revised)	3/4 1-13	Boration Systems - Charging Pump (operating): charging pump tests.
4.1.2.5.a, b, & c (revised)	3/4 1-14	Boration Systems - Boric Acid Pumps (shutdown): boric acid pump tests.
4.1.2.6.a, b, & c (revised)	3/4 1-15	Boration Systems - Boric Acid Pumps (operating): boric acid pump tests.
4.4.3 (revised)	3/4 4-3	Reactor Coolant System - Safety Valves (Operating): pressurizer code safety valve tests.
4.5.2.b.1, 2, & 4 (deleted)	3/4 5-4&5	Emergency Core Cooling Systems - ECCS Sub-systems (Tavg $\geq$ 300°F): HPSI pump, LPSI pump, and power operated valve tests.
4.5.2.e.1 (deleted)	3/4 5-6	Emergency Core Cooling Systems - ECCS Sub-systems (Tavg $\geq$ 300°F): cycling of power operated valves not testable during plant operation.
4.6.2.1.a.1, 2, 3, & 4 (deleted)	3/4 6-15& 16	Depressurization and Cooling Systems - Containment Spray System: spray pump and power operated/automatic valve tests.
4.6.2.1.b.1 (deleted)	3/4 6-16	Depressurization and Cooling Systems - Containment Spray System: cycling of power operated valves not testable during plant operation.

Specification	Page	Remarks
4.6.3.1.1.a & b (revised)	3/4 6-18& 19	Containment Systems - Containment Isolation Valves: valve tests.
4.6.3.1.2.b & c (deleted)	3/4 6-19	Containment Systems - Containment Isolation Valves: valve tests.
4.7.1.1 (revised)	3/4 7-1	Plant Systems - Turbine Cycle: main steam line code safety valve tests.
4.7.1.2.a.1, 2, 3, & 4 (deleted)	3/4 7-4&5	Plant Systems - Auxiliary Feedwater System: auxiliary feedwater pump and power operated/automatic valve tests.
4.7.1.2.b (deleted)	3/4 7-5	Plant Systems - Auxiliary Feedwater System: cycling of power operated valves not testable during plant operation.
4.7.1.5.a & b (revised)	3/4 7-9	Plant Systems - Main Steam Isolation Valves: MSIV tests.
4.7.3.1.a.1, 2, 3, 4, & 5 (deleted)	3/4 7-14	Plant Systems - Component Cooling Water System: CCW pump and power operated/automatic valve tests.
4.7.3.1.b.1 (deleted)	3/4 7-15	Plant Systems - Component Cooling Water System: cycling of power operated valves not testable during plant operation.
4.7.4.1.a.1, 2, 3, 4, & 5 (deleted)	3/4 7-16	Plant Systems - Intake Cooling Water System: pump and power operated/automatic valve tests.
4.7.4.1.b.1 (deleted)	3/4 7-17	Plant Systems - Intake Cooling Water System: cycling of power operated valves not testable during plant operation.

Specification	Page	Remarks
3/4.0.5	B3/4 0-3	A new Bases section is added to correspond to new Specification 4.0.5.
3/4.6.1.2	B3/4 6-1	The Bases section on Containment Leakage is revised to include reference to surveillance testing performed in accordance with the applicable ASME Code and Addenda.
3/4.7.1.1	B3/4 7-1	The Bases section on Safety Valves is revised to include reference to surveillance testing performed in accordance with the applicable ASME Code and Addenda.

The proposed Technical Specification changes and the pump and valve testing program are being submitted to satisfy a January 14, 1977 letter from your staff. The January 14 letter states that any in-service tests of pumps and valves conducted on or after July 1, 1977, shall comply with those requirements in editions of the Code and Addenda referenced in 10 CFR 50.55a(b). However, before the proposed program can be fully implemented after approval, numerous procedures will have to be written or modified. Approximately 6 months will be needed to develop the required procedures and implement our proposed program. Due to the magnitude of the effort involved, it will not be practical to commence the modification and preparation of the required procedures until the proposed program, including Technical Specifications, has been accepted by your staff.

Therefore, Florida Power & Light Company respectfully requests, in accordance with 10 CFR 50.12, an exemption from the requirements of 10 CFR 50.55a(g)(4)(v) and the Staff's January 14, 1977 letter for the 6-month period beginning either on July 1, 1977, or on the date we receive NRC approval of our proposed pump and valve program, whichever occurs later. Until that time, we plan to continue to comply with the existing Technical Specification surveillance requirements.

Our request for exemption has been reviewed by the St. Lucie Facility Review Group (FRG) and the Florida Power & Light Company Nuclear Review Board (CNRB) with the following conclusions:

1) The proposed inservice examination and testing program provides some additional assurance over the already adequate requirements of the Facility Technical Specifications that certain safety-related components are functioning properly.

2) Delay in implementing this proposed program will not endanger life or property or the common defense and security of the public.

3) Ensuring the careful preparation, review, and approval of implementing procedures prior to implementation of the proposed program is in the public interest.

4) The request for exemption, as stated above, is necessary, and the time period of the exemption is appropriate.

The FRG and CNRB have also reviewed the proposed pump and valve test program and associated Technical Specifications. They have concluded that they do not involve an unreviewed safety question.

Very truly yours,

Robert E. Uhrig
Vice President

REU/MAS/cpc

cc: Mr. Norman C. Moseley, Region II
Robert Lowenstein, Esquire