

A 09/20/78

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FURNISHING ADDL INFO IN SUPPORT OF APPLICANT'S ORIGINAL 09/20/77 RESPONSE TO NRC'S LTR OF 07/18/77, CONSISTING OF INFO CONCERNING HPSI/LPSI THROTTLE VALVE TECH SPECS... ADVISING APPLICANT'S BELIEVES ADEQUATE REQUIREMENTS EXIST AND ANY TECH SPECS CHANGE WO

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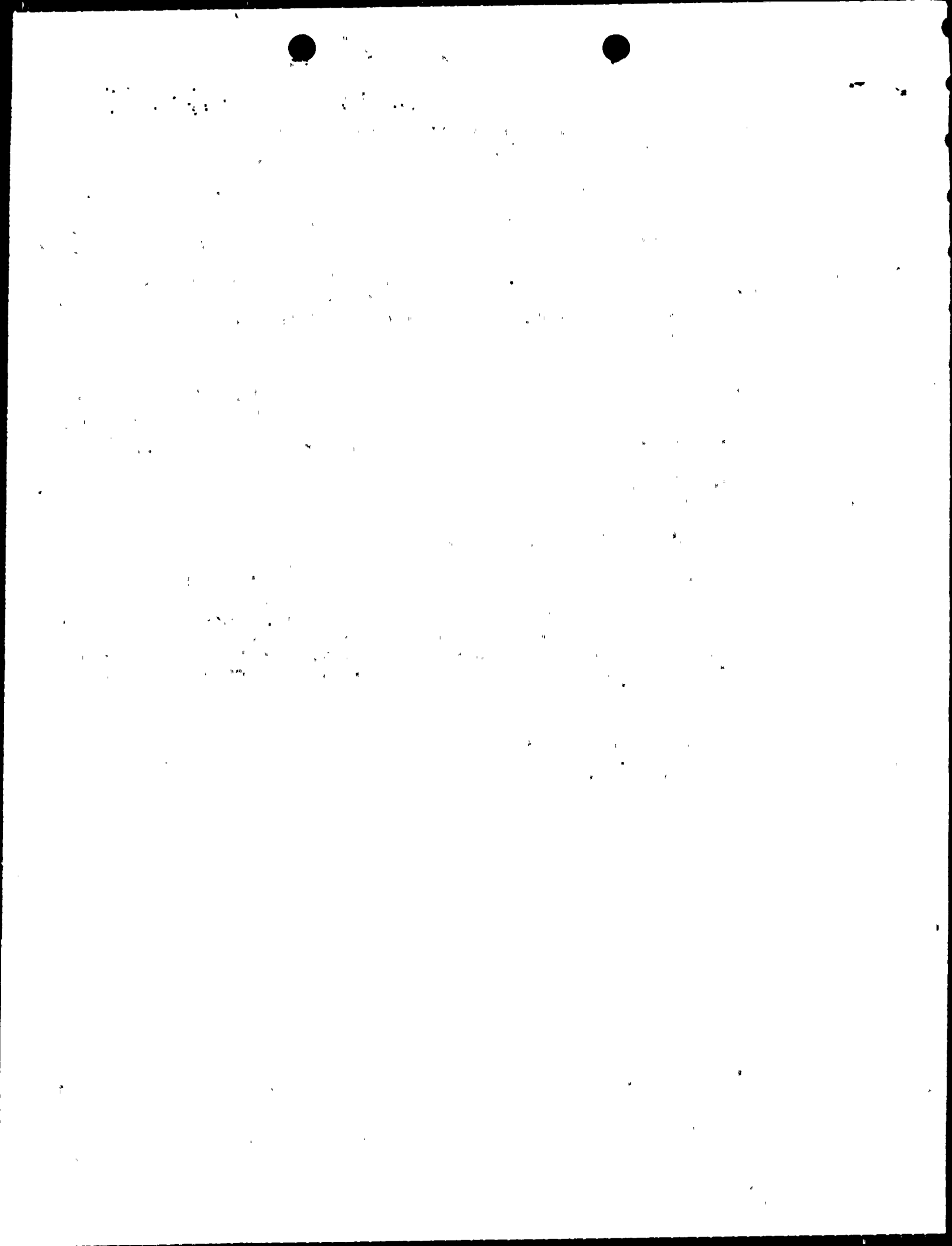
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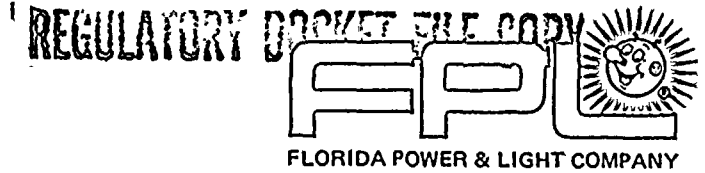
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September 21, 1978
L-78-309

Office of Nuclear Reactor Regulation
Attn: Mr. Robert W. Reid, Chief
Operating Reactors Branch No. 4
Division of Operating Reactors
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Reid:

Re: St. Lucie Unit No. 1, Docket No. 50-335
HPSI/LPSI Throttle Valve Technical Specifications

Our letter of September 20, 1977, responded to the NRC's letter of July 18, 1977, concerning the above subject. Recent discussions with members of the NRC staff have indicated the desirability of supplementing our original response.

FPL fully understands the concern expressed in the staff's letter for assuring that throttle valves used to obtain the required flow distribution in the HPSI or LPSI systems are at their proper settings. As we stated in our response, only certain valves in the HPSI system are so throttled, and FPL believes that existing requirements already provide the necessary degree of assurance for their settings. Technical Specification 3/4.5.2 requires that the ECCS systems at St. Lucie Unit No. 1 be OPERABLE during operation in MODES 1, 2 and 3, and defines certain surveillance requirements to demonstrate OPERABILITY. OPERABLE-OPERABILITY is defined in the C-E Standard Technical Specifications as follows:

1.6 A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s). Implicit in this definition shall be the assumption that all necessary attendant instrumentation, controls, electric power, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component or device to perform its function(s) are also capable of performing their related support function(s).

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It is FPL's interpretation that these requirements apply to the HPSI throttle valves and that appropriate surveillances and testing must be performed to verify their settings on a routine basis and prior to declaring the ECCS subsystem OPERABLE following maintenance or system modifications. These requirements are implemented in a number of St. Lucie Plant procedures as follows:

| <u>Procedure/QI #</u> | <u>Title</u> |
|-----------------------|---|
| 0410050 | HPSI/LPSI Periodic Test |
| 0010125 | Schedule of Periodic Tests, Checks, and Calibrations |
| QI 11-PR/PSL-1 | Test Control |
| QI 11-PR/PSL-2 | Mechanical Test Control |
| QI 11-PR/PSL-3 | Electrical Test Control |

Each of these procedures, as well as Technical Specification 3/4.5.2 itself, is auditable by inspectors from the NRC's Office of Inspection and Enforcement.

FPL believes that additional regulatory bases for these requirements also exist. These include: Criterion III, "Design Control," and Criterion XI, "Test Control," of Appendix B to 10 CFR 50; Subarticles IWP-3111, "Effect of Pump Replacement, Repair, and Routine Servicing on Reference Values," and IWV-3200, "Valve Replacement, Repair, and Maintenance," of Section XI of the ASME Boiler and Pressure Vessel Code as required by 10 CFR 50.55a; Section C.5.d (making certain guidelines contained in ANSI N18.7-1976 pertaining to design and testing of replacement parts mandatory) of Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)," and 10 CFR 50.59. Indeed, 10 CFR 50.59(a) would prohibit any system modification without prior NRC approval unless the proposed change did not involve an unreviewed safety question or require a technical specification change. Since the HPSI throttle valves are set to assure proper flow distribution in the HPSI system, FPL believes that any modification which could affect that flow distribution would require analysis and testing to assure that the proper flow was maintained and, therefore, that no unreviewed safety question was involved. Records of any such modification conducted pursuant to CFR 50.59(a) would be required to be maintained per 10 CFR 50.59(b) and would be subject to NRC review.

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Mr. Robert W. Reid, Chief
Operating Reactors Branch No. 4
Division of Operating Reactors
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Based upon the above considerations, FPL believes that adequate requirements governing the verification and testing of the HPSI throttle valves at St. Lucie 1 already exist and that any technical specifications relating to them would be redundant and unnecessary.

Yours very truly,



Robert E. Uhrig
Vice President

REU:cf

cc: Mr. J. P. O'Reilly, Region II
Harold F. Reis, Esquire



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