



REGULATORY DOCKET FILE COPY

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May 19, 1978
L-78-177

Office of Nuclear Reactor Regulation
Attention: 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

Your letter of May 8, 1978, requested certain information to complete your review of our application to restart St. Lucie Unit No. 1 following refueling. Your letter further stated that since resolution of your concerns prior to our planned restart of Unit No. 1 was doubtful, we should propose conservative Technical Specifications with respect to Total Planar Radial Peaking Factor (F_{xy}^T) and Total Integrated Radial Peaking Factor (F_r^T).

We have reviewed your suggestion that we resubmit Figure 3.2-3 with F_{xy}^T based on a 9.8% uncertainty factor and F_r^T based on a 7.8% uncertainty factor and have determined that these uncertainties are presently incorporated in Figure 3.2-3 as submitted in our application of March 22, 1978. The F_r^T values related to the DNB LSSS and LCO proposed for Technical Specifications for St. Lucie Unit #1 Cycle 2 are based on a physics uncertainty of 5.1 percent. In addition, the F_r^T values are augmented by an additional penalty of 4.6 percent to cover the water hole peaks as discussed in the licensing submittal. This implies a total penalty of F_r^T of 9.7 percent.

Likewise, the F_{xy}^T values related to the peak linear heat rate LSSS and LCO include a 5.8 percent physics uncertainty (plus the 4.6 percent water hole peaking factor, which implies a total penalty of 10.4 percent.

Based on these allowances (9.7 percent for F_r^T and 10.4 percent for F_{xy}^T), the present proposed Technical Specifications, i.e., 3.2.2, 3.2.3, and Figure 3.2-3, already include uncertainty factors sufficient to address the concerns noted in your letter of May 8.

Data to be used in monitoring integrated and planar radial peaking factors from in-core detector measurements will include an incremental adjustment factor of 4.6 percent to explicitly account for water hole peaking effects. This will provide appropriately adjusted peaking factors to compare to the proposed limits. Therefore, there is no need to revise Figure 3.2-3.

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5/3/78

Mr. Reid
May 19, 1978
Page Two

Members of your staff have expressed agreement with this determination in discussions on this matter. Accordingly, it is our understanding that a revised Figure 3.2-3 is unnecessary.

With regard to the information requested in your letter, we propose to provide you a schedule for furnishing our response to the questions contained in Enclosures 1, 2, and 3 by June 8, 1978.

Yours very truly,


Robert E. Uhrig
Vice President

REU:LLL:lc

cc: Peter B. Erickson
James P. O'Reilly, Region II
Harold F. Reis, Esquire