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REC: STELLO V
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DOC DATE: 02/21/78
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DOCTYPE: LETTER NOTARIZED: YES

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SUBJECT:

LTR 3 ENCL 0

RESPONSE TO NRC'S LTR DTD 01/30/78... FURNISHING INFO ON APPLICANT'S
UNIT 1 STEAM GENERATORS.

PLANT NAME: ST LUCIE #1

REVIEWER INITIAL: XJM
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RESPONSES TO STEAM GENERATOR QUESTIONNAIRE
(DISTRIBUTION CODE A023)

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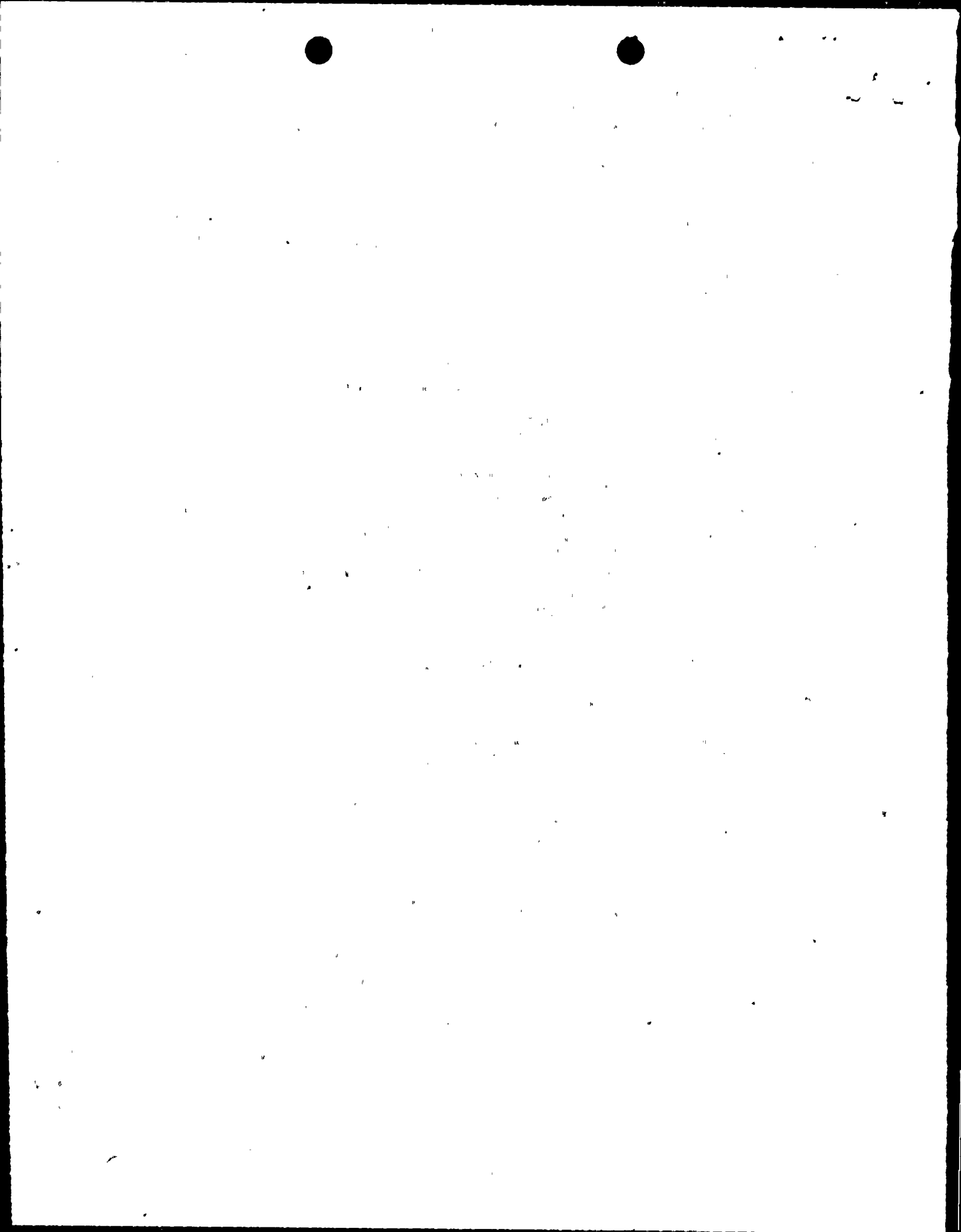
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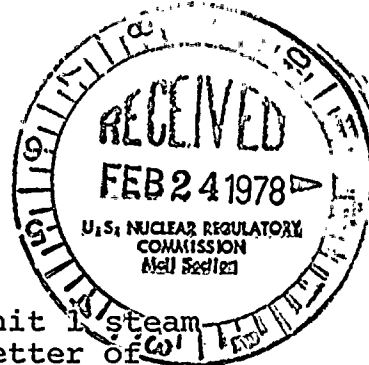
FLORIDA POWER & LIGHT COMPANY

February 21, 1978
L-78-61

Office of Nuclear Reactor Regulation
Attention: Mr. Victor Stello, 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
STEAM GENERATOR INFORMATION



The following information on the St. Lucie Unit 1 steam generators is provided in response to your letter of January 30, 1978:

St. Lucie Unit 1 is scheduled for its first refueling outage around the first of April, 1978. A steam generator inspection has been planned for this outage and will include some inspection of the tube support plates for possible cracking. The inspection program was developed in consultation with Combustion Engineering and is based on the findings at Millstone Unit 2. This inspection will determine if any problems now exist with the steam generator upper horizontal drilled tube support plates.

After reviewing St. Lucie's history we find that chloride intrusion has been very limited and chloride exposure has been significantly less than that reported for Millstone Unit 2. It has been shown in the laboratory that chlorides are definitely implicated in the denting process and it is believed that good chemistry will minimize denting. This is supported by recent steam generator inspections at Ft. Calhoun and Calvert Cliffs where there is good chemistry and the absence of denting. Therefore, we believe that St. Lucie Unit 1 is free of denting, or at worst, that the denting phenomenon may be in an incipient stage. Thus, it is concluded that significant support plate cracking does not exist because such cracking results from stresses created only when extensive denting is present.

Florida Power & Light Company has concluded that operation of St. Lucie Unit 1 will not create undue risk to the health and safety of the public. This conclusion resulted from the review and consideration of the following information.

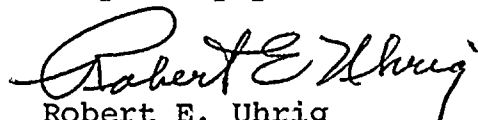
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- (1) St. Lucie is a relatively new plant which has operated with good secondary water chemistry (i.e., very limited chloride ingress). This supports our contention that denting is not present, or in the unlikely event that it has started, that it has not progressed significantly.
- (2) The unit will only operate a short while before it will undergo a steam generator inspection (Inspection tentatively planned for April, 1978).
- (3) St. Lucie's total operating interval is considered to be conservatively bounded by the Millstone Unit 2 experience (i.e., Millstone has operated longer than St. Lucie and has had greater chloride intrusion).
- (4) Industry research and field experience have demonstrated that extensive denting and support plate cracking eventually produce steam generator tube leaking. Furthermore, these leaks (in inconel tubes) develop and propagate very slowly, thus enabling safe and orderly shutdown of the units.
- (5) St. Lucie has not had any steam generator tube leaks.

In summary, we are keeping up to date with steam generator related activities within the industry, so we are familiar with the types of corrective action which could be implemented if the need arises. In the unlikely event that abnormal findings result from the planned steam generator inspections, they will be evaluated jointly with the vendor to develop appropriate corrective action.

Very truly yours,


Robert E. Uhrig
Vice President

REU/MAS/RSA/bab

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

U.S. RRC
DISTRIBUTION SERVICES
BRANCH

1978 FEB 24 AM 11 44

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STATE OF FLORIDA)
) SS.
COUNTY OF DADE)

Robert E. Uhrig, being first duly sworn, deposes and says:


That he is a Vice President of Florida Power & Light Company,
the Licensee herein;

That he has executed the foregoing document; that the state-
ments made in this said document are true and correct to the
best of his knowledge, information, and belief, and that he
is authorized to execute the document on behalf of said
Licensee.


Robert E. Uhrig

Subscribed and sworn to before me this

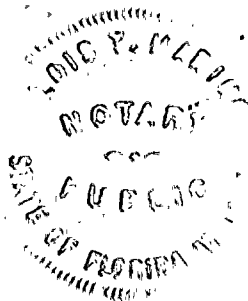
21st day of February, 1978



NOTARY PUBLIC, in and for the County of Dade,
State of Florida

My commission expires:

NOTARY PUBLIC STATE OF FLORIDA at LARGE
MY COMMISSION EXPIRES AUGUST 24, 1981
BONDED THRU MAYNARD BONDING AGENCY



10-10-68
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