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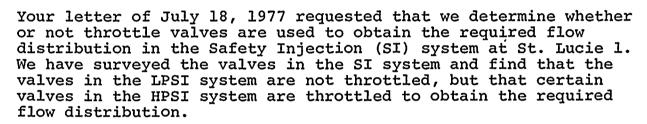
Office of Nuclear Reactor Regulation
Attention: Mr. Don K. Davis, Acting Chief
Operating Reactors Branch No. 2

Division of Operating Reactors

U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Dear Mr. Davis:

Re: St. Lucie Unit 1
Docket No. 50-335



We have reviewed our surveillance requirements and NPSH requirements for the HPSI system. We have concluded that proposing Technical Specifications at this time would be inappropriate for the following reasons:

- 1. Monthly testing of the HPSI throttle valve operability is currently required by Technical Specification 4.5.2. Plant procedures require operating the valve through its cycle to observe its stroke and to verify that it opens to its correct position. This surveillance specification will be replaced by the testing requirements of the Pump & Valve Program (ASME, Section XI) when approved by the Staff.
- 2. Following maintenance on any valve, testing is required by plant procedures pursuant to the requirements of 10 CFR 50.55a (ASME Section XI), 10 CFR 50, Appendix B, and Regulatory Guide 1.33. Signs have been permanently posted on these valves to indicate that the stroke must be verified and reset following maintenance.

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Office of Nuclear Reactor Regulation Page Two

3. Following modifications to valves or portions of the HPSI system, testing is required by Plant Change/Modification and other plant procedures pursuant to the requirements of 10 CFR 50.55a (ASME Section XI) and 10 CFR 50, Appendix B.

Very truly yours,

JA De Mastry
Robert E. Uhrig
Vice President

REU/WAK/cpc

cc: Mr. James P. O'Reilly, Region II Robert Lowenstein, Esquire

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