

50-335

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TO: D K Davis

FROM: Florida Pwr & Light Co  
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furnishing info concerning refueling surveillance testing.....

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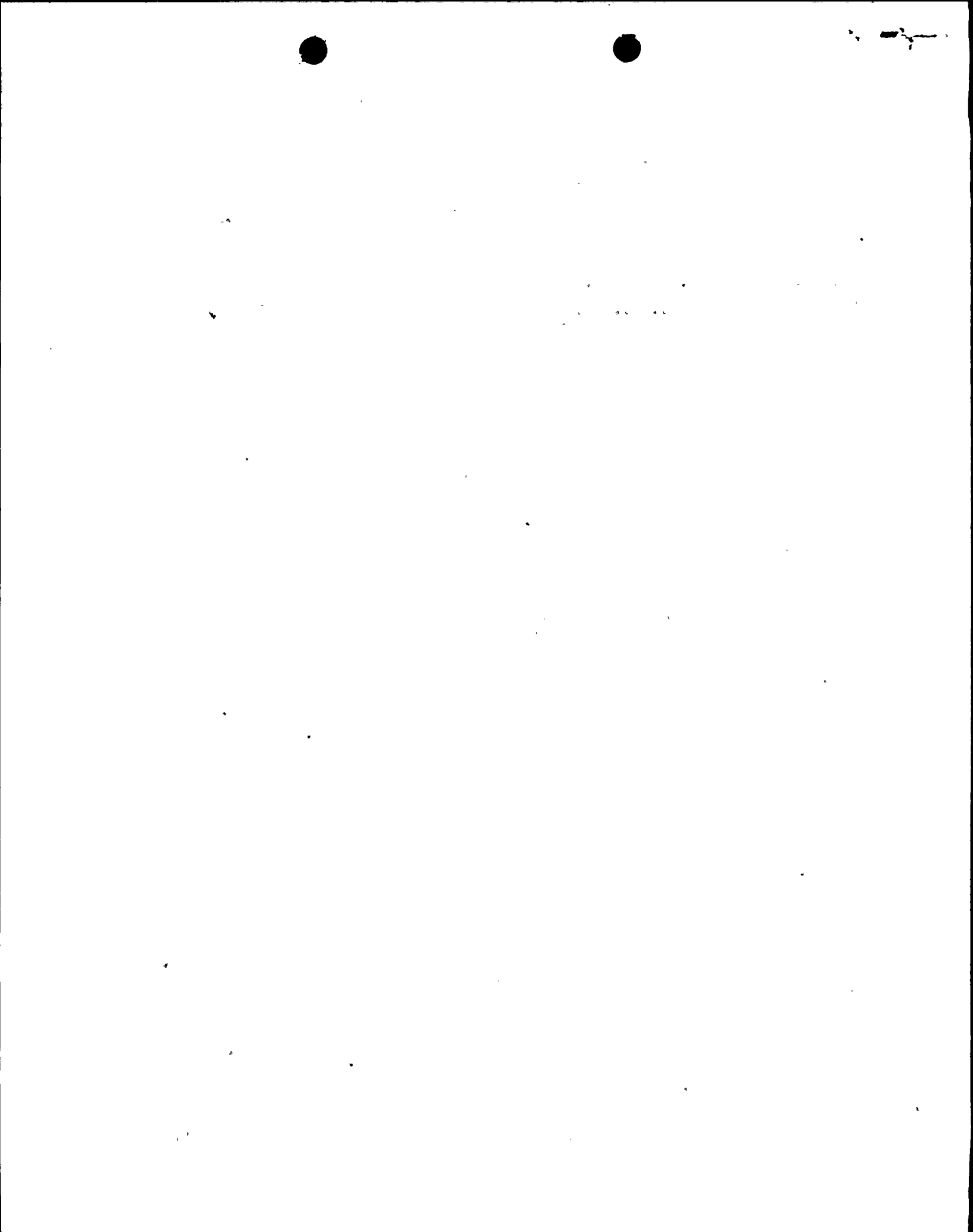
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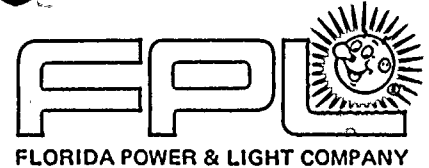
PLANT NAME: St Lucie #1  
6-28-77 ehf

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| PROJECT MANAGER:     | Reeves                 | PROJECT MANAGER:            |
| LICENSING ASSISTANT: | Diss                   | LICENSING ASSISTANT:        |
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June 16, 1977  
L-77-178

## Regulatory Docket File

Office of Nuclear Reactor Regulation  
Attention: Mr. Don K. Davis, Acting Chief  
Operating Reactors Branch #2  
Division of Operating Reactors  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555



Dear Mr. Davis:

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

Our continuing efforts to plan and schedule surveillance testing in compliance with St. Lucie Unit 1 license requirements have led to a problem that could seriously impact the Unit's availability. This problem concerns the scheduling of 18-month/refueling surveillance tests.

At the time of initial fuel loading, we were given the interpretation that all surveillance intervals began at the time of licensing (March 1, 1976, for DPR-67), which would bring the 18-month/refueling surveillances due between September, 1977 and January, 1978. This interpretation was given by the plant's principal inspectors from the Region II Office of Inspection and Enforcement at about the time the operating license was issued, and, until recently, planning for their conduct proceeded on this basis. Approximately two weeks ago, however, a new interpretation was given by Region II. Under the new interpretation, the 18-month/refueling surveillance interval begins at the time of pre-operational testing. Our evaluation of the impact of this has prompted us to reexamine the overall scheduling requirements for these tests, since in either case they must be performed prior to the Cycle 2 refueling outage.

The underlying problem in the conduct of these surveillances is that they will require a unit shutdown and an outage of the magnitude of a normal refueling outage. Because of a lengthy (5-month) outage during 1976 for poison shim replacement we have been forced to defer the Cycle 2 refueling outage until the late summer of 1978. If the unit has to be shut down before this refueling to perform the 18-month/refueling surveillances, the total down-time, including the forced surveillance outage and the scheduled 1978 refueling outage, would be twice the normal amount.

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Mr. D.K. Davis  
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Therefore, for the reasons described above, we request that the end of the first 18-month/refueling surveillance period be extended to the first scheduled refueling outage for St. Lucie Unit 1. FPL would perform subsequent 18-month/refueling surveillances during each subsequent refueling outage in order to preclude the excessive down-time associated with the existing 18-month schedule. Our future efforts are dependent upon your response to our request because many of the outstanding surveillances require outside contractors and this increases the scheduling difficulties. Your prompt response in this matter will be appreciated.

We are reviewing our surveillance program in light of the new interpretation from Region II and the revised refueling schedule in an effort to satisfy technical specification requirements without affecting unit availability. We will be available to discuss this issue with you in order that we may reach a mutually acceptable solution.

Very truly yours,



*for* Robert E. Uhrig  
Vice President

REU:RLH:MAS:dm

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