



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

September 17, 1987

Docket File

Docket No. 50-335

MEMORANDUM FOR: Luis A. Reyes, Director
Division of Reactor Projects, Region II

FROM: Gus C. Lainas, Assistant Director
for Region II Reactors
Division of Reactor Projects-I/II

SUBJECT: RE TEST FOR ADDITIONAL REVIEW OF TECHNICAL SPECIFICATION
INTERPRETATION: ST. LUCIE UNIT 1 - SHUTDOWN COOLING
SYSTEM OPERABILITY (TIA-86-72FM)

Because Florida Power and Light Company (the licensee) had taken one train of the Component Cooling Water (CCW) system, which supports shutdown cooling, out of service for maintenance, Region II issued a Notice of Violation on February 10, 1986, to the licensee for violating St. Lucie Unit 1 Technical Specification (TS) 3.4.1.4.2 by not having two independent trains of shutdown cooling operable during cold shutdown (Mode 5) with the reactor coolant loops not filled. By letter dated July 27, 1986, the licensee argued that its maintenance of the CCW system in Mode 5 with the reactor coolant loops not filled did not violate St. Lucie TS 3.4.1.4.2. By memorandum dated November 7, 1986, Region II asked the Office of Nuclear Reactor Regulation (NRR) to review the licensee's arguments and confirm or provide a regulatory position. This memorandum answers Region II's question.

Inspection Report 50-335/85-36 documents that Region II found one of two shutdown cooling loops required at St. Lucie inoperable because the heat exchanger of its respective CCW loop, CCW Train B, was out of service for repairs and therefore inoperable. The licensee contends that: (1) two shutdown loops were operable because a fully operable CCW system, with emergency diesel power available, was supplying both shutdown loops with cooling water; (2) because CCW heat exchangers are passive rather than active fluid system components, they do not fall under the single failure criterion for fluid systems; and (3) TS Amendment 56 incorporated NRR's long-term shutdown redundancy requirements expressed in the letter dated June 11, 1980, from the Director of the Division of Licensing to the licensee.

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NRR acknowledges that the definition of "operability" in the TS is subject to a wide range of potential interpretations. For plant operation in Mode 5, St. Lucie TS 3.4.1.4.2 clearly requires two redundant shutdown cooling loops, but no TS clearly requires two redundant CCW cooling loops. Accordingly, we believe the licensee's actions in performing maintenance work on the CCW system heat exchanger in Mode 5 do not constitute a clear violation of the TS.

This completes our work under the request from Region II.

Gus C. Lainas, Assistant Director
for Region II Reactors
Division of Reactor Projects-1/II

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- ° Operation of St. Lucie in Mode 5 with one CCW heat exchanger out of service for repairs, as described above, does not cause a safety hazard. NRR does not find such operation inimical to the common defense and security or the public health and safety.
- ° The staff recognizes that current TS may cause some misunderstanding. In particular:

The TS definition of operability does not explicitly require redundancy in support systems (e.g., CCW). The definition of operability includes the requirement that support systems, such as CCW, must be capable of performing their related support functions.

St. Lucie Unit 1 TS 3.4.1.4.2 requires two operable shutdown cooling loops when the reactor is in Mode 5 with the reactor coolant loops not filled. The TS establish no comparable requirements for the CCW system when the reactor is in Mode 5.

In addition to the above evaluation, NRR offers the following comments and recommendations:

- ° The staff is conducting a Technical Specification Improvement Plan (TSIP) with which the staff intends to clarify the TS and prevent future misunderstandings.
- ° In the interim before the TSIP clarifies this issue in the St. Lucie TS, the staff and the licensee can avoid repeated inquiry into the meaning of these particular TS under similar facts if the licensee will agree to perform CCW maintenance, such as the licensee performed here, in Mode 6 rather than in Mode 5.
- ° If the licensee does not wish to make such an agreement, the staff and the licensee should meet to discuss the issue. Following such a meeting, the staff might consider issuing an order to clarify the licensee's obligations pending completion of the TSIP.

This completes our work under the request from Region II.

Gus C. Lainas, Assistant Director
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