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DMB-016

Docket No. 50-302

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Mr. Walter S. Wilgus
Vice President, Nuclear Operations
Florida Power Corporation
ATTN: Manager, Nuclear Licensing
& Fuel Management
P. O. Box 14042; M.A.C. H-2
St. Petersburg, Florida 33733

Dear Mr. Wilgus:

By letter dated August 31, 1984, you proposed delay of installation of the portion of the reactor coolant system water level instrumentation which connects to the reactor vessel head (reactor vessel head level trend system, or RVHLTS) until Refuel VI rather than Refuel V as previously committed, based on utilization of manpower and financial resources during Refuel V. In our letter dated October 10, 1984, we confirmed our previous verbal request for additional justification for this change.

Your letter of February 1, 1985 stated that the purpose of the proposed delay is to provide additional time for dialogue with NRC regarding the value of the RVHLTS and whether it should be installed at all. You based your substantive argument primarily on the results of the Once Through Integral Systems (OTIS) tests performed in April and May of 1984, and concluded that the upper head level trending system is no longer needed since it has been demonstrated that hot leg gases can be removed and natural circulation cooling can be established by opening the high point vents on indication that the fuel clad temperature has reached 1400°F. You also point out that an upper head bubble will not interfere with core cooling and that the subcooling margin based on core exit temperature will be a more reliable and earlier indicator for core cooling protection. The lack of accuracy of the upper head system is cited as a potential source of confusion to the operator. Negative safety effects and expense associated with the upper head system are also cited.

While some of your arguments have merit, they fail to recognize other considerations developed during the initial review, e.g., the purpose of the upper head inventory trending monitor is for indication of the approach to inadequate core cooling (core uncovering) and for monitoring the effectiveness of recovery operations such as emergency coolant injection or the cited venting operations. Under many circumstances, the upper head instrumentation will provide an earlier indication of coolant loss than the subcooling margin instrumentation. Operators should be trained regarding the accuracy of the instrument - the measurement is intended to trend coolant inventory, not to measure the level. Other adverse factors cited are not new information.

In summation, while you have cited new test data to support your position, we see no unexpected results or new information that would bear directly on the arguments already considered during the Commission review which led to issuance of the December 10, 1982 Order for FPC to install a coolant inventory trending system.

Therefore, we do not concur with your requested deferral of installation of the RVHLTS. It is our understanding that you are presently proceeding with the installation of this system and that the installation will be complete by the end of the current refueling shutdown.

Sincerely,

*ORIGINAL SIGNED BY
JOHN F. STOLZ*

John F. Stolz, Chief
Operating Reactors Branch #4
Division of Licensing

cc: See next page

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