

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9005110175 DOC.DATE: 90/05/08 NOTARIZED: NO DOCKET #
 FACIL:50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co. 05000335
 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
 AUTH.NAME AUTHOR AFFILIATION
 SAGER,D.A. Florida Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC Bulletin 88-010, "Nonconforming Molded-Case Circuit Breakers."

DISTRIBUTION CODE: IE21D COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 8
 TITLE: Bulletin Response 88-10 - Nonconforming Molded Case Circuit Breakers.

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD2-2 LA	1 0	PD2-2 PD	1 1
	NORRIS,J	1 1		
INTERNAL:	AEOD/DOA	1 1	AEOD/DSP/TPAB	1 1
	NRR DOEA/GCB 11	1 1	NRR GILL,A.S.	1 1
	NRR GUILLEN,J	1 1	NRR STONE,J.C.	1 1
	NRR/DET/EMEB9H3	1 1	NRR/DOEA/OEAB11	1 1
	NRR/DOEA/OGCB11	1 1	NRR/DREP/PEPB9D	1 1
	NRR/DST 8E2	1 1	NRR/PMAS/TLRB12	1 1
	NRR/POTAPOVS,U	1 1	REG-FILE 02	1 1
	RES/DSIR/EIB	1 1	RGN2 FILE 01	1 1
EXTERNAL:	LPDR	1 1	NRC PDR	1 1
	NSIC	1 1		

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
 ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 22 ENCL 21



MAY. 08 1990.

L-90-161
10 CFR 50.54 (f)

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Gentlemen:

Re: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
NRC Bulletin No. 88-10
Nonconforming Molded-Case Circuit Breakers
(TAC Nos. 71358 and 71359)

NRC Bulletin No. 88-10, "Nonconforming Molded-Case Circuit Breakers", issued November 22, 1988, requested that licensees take actions to provide reasonable assurance that molded-case circuit breakers (CBs), including CBs used with motor controllers; purchased for use in safety-related applications without verifiable traceability to the CB manufacturers, perform their safety functions.

By letter L-89-120 dated April 3, 1989, Florida Power & Light Company (FPL) submitted a partial response to NRC Bulletin No. 88-10. The purpose of this submittal is to provide FPL's response to the remaining requirements of the bulletin. This completes FPL's response to NRC Bulletin No. 88-10.

Should there be any questions about this information, please contact us.

Very truly yours,

DA Sager
D. A. Sager
Vice President
St. Lucie Plant

DAS/MSD/gp

Attachment

cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, St. Lucie Plant

9005110175 900508
PDR ADOCK 05000335
Q PDC

TE21
11

ATTACHMENT

NRC BULLETIN No. 88-10

Reporting Requirement:

1. All holders of operating licenses are required to provide a written report by April 1, 1989, that:
 - a. Confirms that only molded-case Circuit Breakers (CBs) that meet the criteria of item 7 of the actions requested are being maintained as stored spares for future use in safety-related applications.

FPL Response

Florida Power & Light Company (FPL) provided a response to Reporting Requirement 1.a. in letter L-89-120 dated April 3, 1989.

Reporting Requirement:

- 1.b. Summarizes the total number, manufacturer, model number, and to the extent possible the procurement chain of those CBs that could not be traced to the CBM in items 1 and 4 of the actions requested. For installed CBs, also identify each system in which they are/were installed. If item 4 of the actions requested has not been completed by April 1, 1989, due to the schedule for tests in item 3 of the actions requested, this information should be updated within 30 days of the completion of item 4 to address those additional CBs that could not be traced to the CBM.

FPL Response

Florida Power & Light Company (FPL) provided a response to item 1 of the actions requested in letter L-89-120 dated April 3, 1989. For FPL's response to item 4 of the actions requested, refer to Reporting Requirement 1.c. below.

Reporting Requirement:

- 1.c. Confirms that items 1, 2, 3, 4, 5, 6 and 7 of the actions requested have been completed or will be implemented as requested.

Action Requested: 1.

All addresses are requested to perform the following review by March 3, 1989:

- a. Identify all molded-case CBs purchased prior to August 1, 1988, that are being maintained as stored spares for safety-related (Class 1E) applications or commercial grade CBs that are being maintained as stored spares for future use in safety-related applications; this includes CBs purchased from a CBM or from any other source. If the number of these stored spare CBs is less than 50 at a nuclear plant site, then randomly select CBs purchased between August 1, 1983 and August 1, 1988 that have been installed in safety-related applications as replacements or modifications to form a minimum sample of 50 CBs per nuclear plant site.
- b. Verify the traceability of these CBs.
- c. Identify the number, manufacturer, model number, and to the extent possible the procurement chain for all those CBs identified in (1a) that cannot be traced to the CBM. For installed CBs, also identify each system in which they are/were installed.

FPL Response

FPL provided a response to Actions Requested 1.a., 1.b., and 1.c. in letter L-89-120 dated April 3, 1989.

Action Requested: 2.

All holders of operating licenses who identify installed CBs per item 1 above or item 4 below that cannot be traced to a CBM are requested to prepare, within 30 days of the completion of each item, an analysis justifying continued operation until items 1 through 5 of the actions requested in this bulletin have been completed.

FPL Response

Following FPL's response to item 1 of the actions requested (see FPL letter L-89-120, dated April 3, 1989), an assessment of the acceptability for use of all installed safety related circuit breakers (CB) that were procured under the same purchase orders as the 22 nontraceable stored spare CBs was performed (Reference: NRC Bulletin No. 88-10 Supplement 1, Position 4). The results revealed one untraceable CB was installed in the St. Lucie Unit 2 Qualified Safety Parameter Display System. This breaker has since been replaced with a traceable CB in accordance with the criteria of item 7 of the

actions requested. The information concerning this nontraceable breaker, as requested in item 4.c. of the actions requested, is provided in Attachment 1 (item 1). Additionally, see FPL's responses to items 3, 4 and 5 of the actions requested for the remaining information requested in Action Requested 2.

Action Requested: 3.

All addressees who identify 80 percent or more CBs traceable to the CBM per item 1 above are requested to test the CBs that are not traceable to the CBM in accordance with the test program described in Attachment 1. Any installed CBs that fail any of these tests should be replaced with CBs that meet the criteria of item 7 of the actions requested or CBs that pass all tests in accordance with the testing program described in Attachment 1. If more than 10 percent of the CBs tested fail any of the tests described in Attachment 1, continue with item 4; otherwise, proceed to item 6 of the actions requested.

Holders of operating licenses are requested to complete this testing program before startup from the first refueling outage beginning after March 1, 1989. Holders of construction permits are requested to complete this testing program before fuel load.

FPL Response

FPL determined that twenty-two (22) out of one hundred and twenty-four (124) CBs were maintained as stored spares which could not be traced to the original CB manufacturers (see FPL letter L-89-120, dated April 3, 1989). Therefore, FPL had determined that 80 percent or more of the stored spare CBs were traceable to the CBM. In an NRC memorandum dated January 5, 1989 (Charles E. Rossi to Steven A. Varga and Gary M. Holahan, "Interpretation/Clarification of Bulletin No. 88-10: Nonconforming Molded-Case Circuit Breakers"), the NRC Staff agreed that testing of the nontraceable spares need not be performed provided the utility performs Bulletin No. 88-10 items 4 and 5 of the actions requested, regardless of the traceability results of item 1 of the bulletin. Following a review of the Bulletin No. 88-10 CB test program, FPL elected not to test the twenty-two nontraceable CBs, but instead elected to perform items 4 and 5 of the actions requested in accordance with the January 5, 1989, NRC memorandum.

Action Requested: 4.

All addresses who identify less than 80 percent of the CBs traceable to the CBM per item 1 above or who identify a failure rate of more than 10 percent for the CBs tested per item 3 above are requested to perform the following actions:

- a. Identify all molded-case CBs that have been purchased between August 1, 1983 and August 1, 1988, and installed in safety-related applications as replacements or installed during modifications.
- b. Verify the traceability of these CBs.
- c. Identify the number, manufacturer, model number, system in which they are/were installed, and to the extent possible, the procurement chain for all those CBs identified in (4a) that cannot be traced to the CBM.

FPL Response

FPL identified all St. Lucie plant molded-case CBs purchased between August 1, 1983 and August 1, 1988 and installed in safety-related applications. Traceability to the original CB manufacturer has been determined for all but four (4) CBs. Attachment 1 lists the information requested in item 4.c. for those four installed (items 2-5 of Attachment 1) CBs which were not traced to the original CB manufacturer.

Action Requested: 5.

All addressees who identify installed CBs that cannot be traced to the CBM per item 4 above are requested to replace these CBs with components that meet the criteria of item 7 of the actions requested or to test them in accordance with the program described in Attachment 1; CBs that fail any of these tests should be replaced with CBs that meet the criteria of item 7 of the actions requested or CBs that pass all tests in accordance with the test program described in Attachment 1.

Holders of operating licenses are requested to replace or to test at least one-half, or all if the total number is less than 75, of these installed CBs before startup from the first refueling outage beginning after March 1, 1989. The remaining CBs should be replaced or tested before startup from the second refueling outage beginning after March 1, 1989.

Holders of construction permits are requested to replace or to test these installed CBs before fuel load.

FPL Response

FPL has elected to replace those CBs listed in Attachment 1 with breakers that meet the criteria of item 7 of the actions requested. Three of the five breakers listed in Attachment 1 have already been replaced. The other two breakers are scheduled to be replaced as shown in Attachment 1 (Replacement Status) as required by Bulletin No. 88-10. For the breakers to be replaced, a justification for continued operation for each breaker has been developed in accordance with item 2 of the actions requested.

Action Requested: 6.

Information generated while performing the actions requested in items 1, 2, 3, 4, and 5 above should be documented and maintained for a period of 5 years after the completion of all requested actions.

FPL Response

FPL provided a response to Action Requested 6. in letter L-89-120 dated April 3, 1989.

Action Requested: 7

With the exception of actions taken in response to items 3 and 5 of the actions requested above, molded-case CBs installed in safety-related applications after August 1, 1988 should be:

- a. Manufactured by and procured from a CBM under a 10 CFR 50, Appendix B, program; or
- b. Procured from a CBM or others with verifiable traceability to the CBM, in compliance with applicable industry standards, and upgraded to safety-related by the licensee or others using an acceptable dedication program. The NRC encourages addresses to significantly upgrade their dedication programs through a joint industry effort to ensure their adequacy and consistency. The NRC will monitor these industry initiatives and if they are not sufficient or not timely, or if problems with the dedication of commercial grade equipment for safety-related use continue, the NRC will take appropriate regulatory actions.

FPL Response

Molded case CBs to be installed in safety-related applications are manufactured and procured from a CB manufacturer under a 10 CFR 50, Appendix B program. Additionally, statements have been added to procurement documents for all molded case CBs requiring that certification of traceability to the breaker manufacturer be provided with the breakers.

Reporting Requirement:

2. All holders of operating licenses are required to submit a report that summarizes available results of tests conducted in accordance with items 3 and 5 of the actions requested within 30 days after startup from the first and second refueling outages beginning after March 1, 1989. For CBs that pass these tests, the only information required is the number, manufacturer, model number and to the extent possible the procurement chain of CBs tested (summary report format is acceptable). For CBs that fail these test(s) these reports should indicate the test(s) and the values of test parameter(s) at which the failure(s) occurred, as well as the corresponding manufacturer, model number, and to the extent possible, the procurement chain.

FPL Response

As stated in response to item 4 of the actions requested, FPL elected not to test the twenty-two nontraceable breakers, and instead elected to perform items 4 and 5 of actions requested. Since FPL did not test, a report that summarizes the results of these test is not applicable.

ATTACHMENT 1

<u>ITEM</u>	<u>MFR/SUPPLIER</u>	<u>PROCUREMENT CHAIN</u>	<u>MODEL/PART#</u>	<u>UNIT</u>	<u>SYSTEM</u>	<u>REPLACEMENT STATUS</u>
1)	GE/Solidstate	Unknown	THFK224150	2	Qualified Safety Parameter Display System Inverter	Replaced (9/25/89)
2)	West/C&D*	Unknown	FB3125L	1	1A Battery Charger	Replaced (1/3/90)
3)	SQ.D./Whiting*	Unknown	QOU120	2	Fuel Cask Crane	Replaced (12/15/89)
4)	GE/GESCO	Unknown	THED136070	2	Breaker Feeds Power Panel 220 from Motor Control Center 2A6	Scheduled Replacement (Fall 1990)
5)	West/L&D	Unknown	QC1030	2	Breaker for Limit Switch to 2B DC Bus Tie Breaker Motor Operated	Scheduled Replacement (Fall 1990)

*A final determination on the traceability of this breaker was not made since a traceable replacement breaker was available.