



June 20, 1980
L-80-199

Central File
50-250
251

Mr. James P. O'Reilly, Director, Region II
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: RII:JPO
50-250, 50-251
IE Bulletin 80-06

Florida Power & Light Company has reviewed the subject bulletin and our response is attached. A followup response will be submitted by August 1, 1980 to disposition potential plant modifications which are still under consideration.

Very truly yours,

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/MAS/paf

Attachment

cc: Director, Office of Inspection and Enforcement
Harold F. Reis, Esquire

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10-10-18

ATTACHMENT

Response to I&E Bulletin 80-06

1. Our Architect Engineer has reviewed the elementary diagrams of equipment actuated by safety signals to determine the position each takes after the reset of the safety signal. The review showed that the following equipment does not remain in the emergency mode upon reset of the ESF signal:
 - a. Pressurizer Heater Backup Group B
 - b. Containment Cooling Fans V1A, V1B, V1C and V1D
 - c. Containment Sump Pumps P23A and P23B
 - d. Containment Isolation Air Sample Valves V2911, V2912 and V2913
 - e. Pressurizer Relief Control Valves CV 455C and CV 456
 - f. Feedwater Main Control Valves FCV 478, FCV 488 and FCV 498
 - g. Feedwater Bypass Control Valves FCV 479, FCV 489 and FCV 499
 - h. Turbine Plant Cooling Water Stop Valve V 2201
2. The testing of the installed circuits and controls is scheduled to be completed during the next refueling outage at each Unit during the Integrated Safeguards test (Jan. 81 for Unit 4; April 81 for Unit 3).
3. Modifications are under consideration for certain systems listed in Item 1. The modification may or may not be implemented pending review by plant personnel.
 - a. Pressurizer backup heater.

The emergency procedure 20001 (E-1) clearly defines the parameters that must be satisfied prior to resetting the safety injection (SI) signal. Resetting SI does not turn on the pressurizer backup heater group B but rather allows the heaters to turn on only if the proper conditions of pressurizer level and pressure are satisfied. Since the emergency procedure requires that the operator review the system parameters prior to reset, placement of the heaters in an "on permissive" mode by resetting the safety signal does not create an unsafe condition assuming that the operator follows his procedure. If operator error is assumed, normal system protection is provided by the pressurizer heater control circuitry and overpressure protection equipment. Therefore, we do not intend to modify the control circuits for the pressurizer backup heaters.

b. Containment Cooling Fans

Seal-in circuitry is under consideration with a separate reset/start pushbutton in the control room for each fan.

c. Containment Sump Pumps

An interlock on the start circuit of the sump pumps is under consideration with a permissive contact of the containment sump discharge valve position switches such that the pumps could not start if the valves are in the emergency mode (closed). The circuitry of these discharge valves has already been modified to remain in its emergency mode after reset of the ESF signal.

d. Containment Isolation Air Sample Valves

Seal-in circuitry and an override switch are under consideration with status light or annunciation on the control board.

e. Pressurizer Relief Valves

We do not intend to modify the control circuit for these valves. The basis for not altering the circuitry is the same as item (a) above. Since the operating procedure has the operator check the required plant parameters prior to resetting the emergency signal, the necessary plant conditions will be verified prior to allowing the valves to return to an "open permissive" mode.

f&g. Feedwater Main and By-pass Control Valves

We are in the process of obtaining a recommendation from our NSSS vendor regarding the operation of these valves in view of the Bulletin requirements. Upon receipt of their recommendation, we will propose any design changes as required.

h. Turbine Plant Cooling Water Stop Valve

Seal-in circuitry is under consideration with a reset/open pushbutton in the control room.

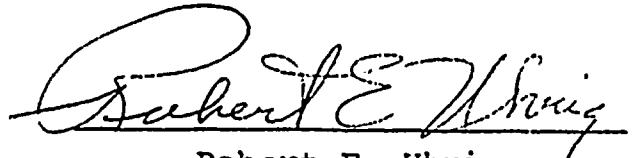
The final decision regarding potential modifications 3.b, 3.c, 3.d, 3.f, 3.g, and 3.h should be made in July. We plan to submit a description of any proposed modifications with a schedule for implementation, including interim measures if necessary, on or before August 1, 1980.

STATE OF FLORIDA)
)
COUNTY OF DADE) SS.

Robert E. Uhrig, being first duly sworn, deposes and says:

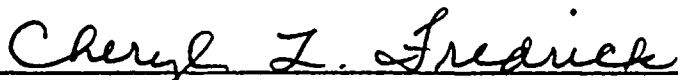
That he is a Vice President of Florida Power & Light Company,
the Licensee herein;

That he has executed the foregoing document; that the state-
ments made in this said document are true and correct to the
best of his knowledge, information, and belief, and that he
is authorized to execute the document on behalf of said
Licensee.


Robert E. Uhrig

Subscribed and sworn to before me this

20 day of June, 1980


NOTARY PUBLIC, in and for the county of Dade,
State of Florida

My commission expires: Notary Public, State of Florida at Large
My Commission Expires October 30, 1983
Bonded thru Maynard Bonding Agency