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FROM: Florida Power & Light Co. Miami, Fla Robert E. Uhrig	DATE OF DOC 7-28-75	DATE REC'D 7-28-75	LTR xxx	TWX	RPT	OTHER
TO: Mr. Angelo Giambusso	ORIG 3-signed	CC	OTHER	SENT NRC PDR xxxxx SENT LOCAL PDR xxxx		
CLASS	UNCLASS xxxx	PROP INFO	INPUT	NO CYS REC'D	DOCKET NO: 50-335	

DESCRIPTION:

Ltr notarized 7-28-75 ...trans the following:

ACKNOWLEDGED
DO NOT REMOVE

ENCLOSURES:

Revision #4 to the Proposed Environmental Tech- Specs .....furn comments on sections 2.2.1, 2.4.2.c, Table 2.4-1, Table 2.4-3 and 2.4-4, Sec 3.1.B.f and Table 3.2-1 .....

(40 cys enc'l rec'd)

See RPS

PLANT NAME: St. Lucie #1

FOR ACTION/INFORMATION 7-28-75 JGB

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P. O. BOX 013100, MIAMI, FLORIDA 33101

FPL

FLORIDA POWER & LIGHT COMPANY

Regulatory File Cy.

July 28, 1975
L-75-374

Mr. Angelo Giambusso, Director
Division of Reactor Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Giambusso:

Re: St. Lucie Unit No. 1 - Docket No. 50-335
Environmental Technical Specification Change

Florida Power & Light Company hereby submits for your review three signed originals and 40 copies of revision 4, dated 7/28/75, to the proposed St. Lucie Unit No. 1 Environmental Technical Specifications (ETS).

I wish to take this opportunity to comment upon the following sections of the enclosed document:

Section 2.2.1 - During discussions between representatives of FPL and members of your staff on July 21, 1975, it was stated that FPL's specification on chlorine would comply with the NPDES permit limit for St. Lucie Unit No. 1 of 0.1 mg/l. Upon consideration, it was decided that this limit should be specified as 0.2 mg/l in the ETS. This remains consistent with the limit proposed in Attachment 1 of Mr. William H. Regan's letter to Dr. Robert E. Uhrig, dated July 7, 1975. In addition, we maintain that a total residual chlorine level of 0.2 mg/l is an acceptable level as determined by the Environmental Protection Agency, and as promulgated in the Final Effluent Limitation Guidelines of October 8, 1974. These are not merely guidelines, but have the sanction of law and must therefore be complied with. The limit of 0.1 mg/l in the St. Lucie No. 1 NPDES permit was imposed prior to development of the guidelines. We propose to initiate a change in our NPDES permit upon its expiration or possibly before, which would allow the chlorine residual limitations as determined by EPA, and not more stringent limits than those the Guidelines call for.

Section 2.4.2.c - This section has been modified from that which Mr. William H. Regan's letter of July 9, 1975, transmitted to us. The justification for this modification is based upon St. Lucie Plant Chemistry Department Letter of Instruction CC-04 Revision 0. Per

7993

agreement with members of your staff on July 21, 1975, this LOI, plus its tank recirculation data sheet, are attached as Enclosure 1.

Table 2.4-1 - This table has been modified from that which Mr. William H. Regan's letter of July 9, 1975, transmitted to us. Item B, Primary Coolant, and its related footnote, have been deleted because the required sampling is addressed in the St. Lucie Unit No. 1 Appendix A technical specifications.

Tables 2.4-3 and 2.4-4 - These tables have been modified from those which Mr. William H. Regan's letter of July 9, 1975, transmitted to us. The modifications have been made to reflect the nomenclature used and the actual systems and monitors installed in St. Lucie Unit No. 1. Primary Coolant System (liquid) and Reactor Containment Building (gaseous) monitoring have been deleted because the required sampling is addressed in the St. Lucie Unit No. 1 Appendix A technical specifications. A number of the other systems have been deleted from the tables because no provision for their monitoring, as indicated in the tables, has been made. Although it is recognized that requirements may change over the period of design and construction of a nuclear plant, nonetheless, St. Lucie Unit No. 1 has undergone thorough Staff review of its safety. The findings of the Staff with regard to Process and Effluent Radiological Monitoring are found in Sections 11.5.2 and 11.5.3 of the Staff's Safety Evaluation Report for St. Lucie Unit No. 1, dated November 8, 1974. There the Staff states that "(b)ased on the plant design and on the continuous monitoring locations and intermittent sampling locations, we have concluded that all normal and potential release pathways, excluding those in the turbine building, will be monitored. Due to the high potential for exfiltration from the turbine building which is a relatively open structure, we do not consider it to be practicable to monitor the potential gaseous releases from the turbine building...; We have also determined that the sampling and monitoring provisions will be adequate for detecting radioactive material leakage to normally uncontaminated systems and monitoring plant processes which affect radioactivity releases. On this basis we consider the monitoring and sampling provisions to meet the requirements of AEC General Design Criteria 13, 60 and 64 and the guidelines of Regulatory Guide 1.21.... Based on the foregoing evaluation, we conclude that the proposed provisions for monitoring process and effluent streams are acceptable." Accordingly, FPL believes it would be justified in excluding such monitoring provisions from the ETS.

Section 3.1.B.f - Discussion with members of your staff on July 21, 1975, indicated their desire to include in the ETS the condition relating to monitoring of turtle hatchlings found on page v of the St. Lucie Unit No. 1 Final Environmental Statement. FPL has chosen to delete the words "number of turtle hatchlings" from the ETS because this phase of the life cycle of the turtle is not affected by the thermal plume emanating from the plant during its operation. It is felt that the collection of such data is

irrelevant since it could not effectively be related to existence of the plant's thermal plume.

Table 3.2-1 - Sampling location H40, the Florida Milk Shed, is our control location for milk sampling. The sample consists of a monthly composite from several locations in southeast Florida. It is, therefore, less likely to be biased by the Cs-137 anomaly frequently observed in this area of the state.

Yours very truly,

Robert E. Uhrig

Robert E. Uhrig
Vice President

REU:nch
Enclosures

cc: Jack R. Newman, Esquire

STATE OF FLORIDA)
) SS
COUNTY OF DADE)

ROBERT E. UHRIG, being first duly sworn, deposes and says:

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

That he has executed the foregoing instrument; that the statements made in this said instrument are true and correct to the best of his knowledge, information and belief; and that he is atuhroized to execute the instrument on behalf of said Applicant.

Robert E. Uhrig

Robert E. Uhrig

Subscribed and sworn to before me

this 28th day of July, 1965

Theresa Carcaro

Notary Public in and for the County of Dade,
State of Florida

NOTARY PUBLIC STATE OF FLORIDA AT LARGE
MY COMMISSION EXPIRES JAN. 26, 1970
BONDED THRU GENERAL INSURANCE UNDERWRITERS

My Commission expires