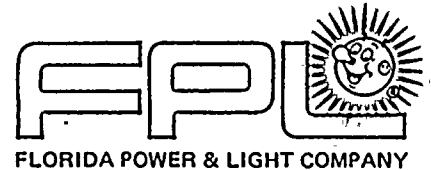


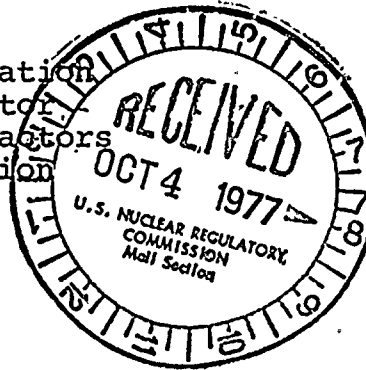
REGULATORY DOCKET FILE COPY

P. O. BOX 013100, MIAMI, FL 33101



September 16, 1977  
L-77-291

Office of Nuclear Reactor Regulation  
Attn: Mr. Victor Stello, Director  
Division of Operating Reactors  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555



Dear Mr. Stello:

Re: St. Lucie Unit No. 1  
Docket No. 50-335  
Proposed Supplemental Amendment to  
Facility Operating License DPR-67

On March 18, 1977, Florida Power and Light Company (FPL) submitted its proposed pump and valve test program for St. Lucie Unit No. 1. Proposed Technical Specification changes to conform the Technical Specifications to the revised program were also submitted as required by 10 CFR 50.55a(g)(5)(ii). Your letter of May 24, 1977, acknowledged receipt of these items and requested additional information for the purpose of evaluating our proposed program. The information which you requested is contained in Attachment A to this letter.

As a result of the review which has been prompted by your request for additional information and discussions with your Staff, FPL has made numerous changes in the proposed pump and valve test program for the purpose of providing additional clarification. Although we believe that none of these changes are of a substantive nature, we are nonetheless submitting a revised program to replace in toto that which was forwarded to you on March 18. The revised program is contained in Attachment B to this letter and is identified by the date 9/16/77 on each page. Exceptions to the ASME Code, Section XI requirements are identified and supporting information is presented in Table II of the revised proposed program in accordance with the provisions of 10 CFR 50.55a(g)(5)(iii). Relief from those requirements is herewith requested.

As per instructions from members of your Staff, FPL is also forwarding under separate cover ten sets of the drawings used in the development of the revised proposed pump and valve test program. One of these sets has been marked-up to show the various system boundaries.

Our submittal of March 18 included proposed Technical Specification changes to conform the Technical Specifications to the requirements of the proposed test program. As a result of our review of the program, we find it necessary to withdraw some of the proposed

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Technical Specification changes submitted at that time either as being unnecessary or for the purpose of further modification. Please delete the following items from our March 18 submittal:

<u>Specification</u>	<u>Page</u>
1.21	1 - 5
4.0.5	3/4 0-2
4.7.1.2.b	3/4 7-5
3/4.0.5	B3/4 0-3
3/4.6.1.2	B3/4 6-1
3/4/7.1.1	B3/4 7-1

In accordance with instructions contained in your letter of January 14, 1977 to FPL regarding exemption from the initial implementation requirements of 10 CFR 50.55a(g), a proposed in-service inspection program for St. Lucie Unit No. 1 for ASME Code Class 1,2 and 3 components, together with appropriate proposed Technical Specification changes, were submitted to you on July 1, 1977. As a result of additional modifications required to the items proposed, which are described below, we request that the following items from our July 1 submittal be deleted:

<u>Specification</u>	<u>Page</u>
4.0.5	3/4 0-2
3/4.0.5	B3/4 0-3

Additional Technical Specification changes have been identified pursuant to our review of the entire in-service testing and inspection program. Pursuant to the requirements of 10 CFR 50.55a(g)(4)(ii) and in accordance with 10 CFR 50.30, FPL herewith submits three signed originals and forty (40) copies of a supplemental request to amend Appendix A of Facility Operating License DPR-67. The additional proposed Technical Specification changes are described below and shown on the accompanying Technical Specification pages in Attachment C bearing the date of this letter in the lower right hand corner.

The following Specifications are deleted, added or revised to conform the existing Technical Specifications to the revised proposed pump and valve test and in-service inspection program.

<u>Specification</u>	<u>Page</u>	<u>Remarks</u>
4.0.5 (Added)	3/4 0-2&3	New Specification 4.0.5 is added to specify the pump and valve test requirements.
4.4.2 (Revised)	3/4 4-2	Reactor Coolant System-Safety Valves (Shutdown): pressurizer code safety valve tests referenced to Specification 4.0.5.

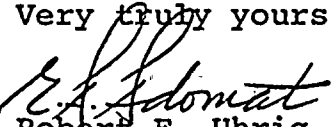


<u>Specification</u>	<u>Page</u>	<u>Remarks</u>
3.4.10.1 (Deleted)	3/4 4-26	Reactor Coolant System-Structural Integrity (Safety Class 1 Components): LCO superseded by proposed Specification 3.4.10.1 below.
4.4.10.1 (Deleted)	34 4-26&27	Reactor Coolant System Structural Integrity (Safety Class 1 Components): Surveillance superseded by proposed Specification 4.4.10.1 below.
Table 4.4-6 (Deleted)	3/4 4-28 to 36	In-service Inspection Program - Safety Class 1 Components: Superseded by proposed Specification 4.4.10.1 below.
3.4.10.2 (Deleted)	3/4 4-37	Reactor Coolant System-Safety Class 2 Components: LCO superseded by proposed Specification 3.4.10.1 below.
4.4.10.2 (Deleted)	3/4 4-37 & 38	Reactor Coolant System-Safety Class 2 Components: Surveillance superseded by proposed Specification 4.4.10.1 below.
Table 4.4-7 (Deleted)	3/4 4-39 to 52	In-service Inspection Program-Safety Class 2 Components: Superseded by proposed Specification 4.4.10.1 below.
3.4.10.3 (Deleted)	3/4 4-53	Reactor Coolant System-Safety Class 3 Components: LCO superseded by proposed Specification 3.4.10.1 below.
4.4.10.3 (Deleted)	3/4 4-53 & 54	Reactor Coolant System-Safety Class 3 Components: Surveillance superseded by proposed Specification 4.4.10.1 below.
Table 4.4-8 (Deleted)	3/4 4-55	In-service Inspection Program-Safety Class 3 Components: Superseded by proposed Specification 4.4.10.1 below.
3.4.10.1 (Added)	3/4 4-26	Reactor Coolant System-3.4.10 Structural Integrity (ASME Code Class 1, 2 and 3 Components): LCO's for ASME Code Class 1, 2, and 3 Components referenced to ASME Code requirements.
4.4.10.1 (Added)	3/4 4-26	Reactor Coolant System-3.4.10 Structural Integrity (ASME Code Class 1, 2 and 3 Components): Surveillances referenced to Specification 4.0.5.

<u>Specification</u>	<u>Page</u>	<u>Remarks</u>
4.5.2.f (Added)	3/4 5-6	Emergency Core Cooling Systems-ECCS Subsystems ( $T_{avg} > 300^{\circ}F$ ): ECCS subsystem valve tests referenced to Specification 4.0.5.
4.6.2.1.d (Added)	3/4 6-16	Depressurization and Cooling Systems-Containment Spray System: Containment spray system pump and valve tests referenced to Specification 4.0.5.
3.6.3.1 (Revised)	3/4 6-18	Containment Systems-Containment Isolation Valves: Clarification of test times in Table 3.6-2 is provided.
4.6.3.1.3 (Added)	3/4 6-19	Containment Systems-Containment Isolation Valves: Isolation valve tests referenced to Specification 4.0.5.
4.7.1.2.b (Revised)	3/4 7-5	Plant Systems - Auxiliary Feedwater System: Feedwater pump and valve tests referenced to Specification 4.0.5.
4.7.3.1.c (Added)	3/4 7-15	Plant Systems-Component Cooling Water System: CCW pump and valve tests referenced to Specification 4.0.5.
4.7.4.1.c (Added)	3/4 7-17	Plant Systems-Intake Cooling Water System: ICW pump and valve tests referenced to Specification 4.0.5..
3/4.0.5 (Added)	B3/4 0-3.	A new Bases section is added to correspond to new Specification 4.0.5.
3/4.4.10 (Revised)	B3/4 4-12 & 13	The Bases section on Structural Integrity is revised to incorporate reference to surveillance performed in accordance with the applicable ASME Code and Addenda.

The FRG and CNRB have reviewed these proposed Technical Specification changes and have concluded that they do not involve an unreviewed safety question.

Very truly yours,

*for*   
Robert E. Uhrig  
Vice President

REU/LLL:ltm  
Attachments

cc: Robert Lowenstein, Esq.  
J. P. O'Reilly, Region II




STATE OF FLORIDA     )  
                              )  
COUNTY OF DADE     )     SS.

E. A. Adomat, being first duly sworn, deposes and says:

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

That he has executed the foregoing document; that the statements 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.

  
E. A. Adomat

Subscribed and sworn to before me this

16th day of September, 1977



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 AUGUST 24, 1981  
BONDED THRU MAYNARD SENSING AGENCY

