

50-335

## NRC DISTRIBUTION FOR PART 50 DOCKET MATERIAL

FILE NUMBER

TO:  Mr. Dennis L. Ziemann	FROM: Florida Power & Light Company Miami, Florida Mr. Robert E. Uhrig	DATE OF DOCUMENT 8/3/76
<input checked="" type="checkbox"/> LETTER <input type="checkbox"/> ORIGINAL <input checked="" type="checkbox"/> COPY	<input checked="" type="checkbox"/> NOTORIZED <input checked="" type="checkbox"/> UNCLASSIFIED	DATE RECEIVED 8/4/76
PROP		NUMBER OF COPIES RECEIVED One signed copy
INPUT FORM		

## DESCRIPTION

Ltr. notorized 8/3/76...requesting that section J of Enclosure 1 to the Unit No. 1 Operating License be deleted as a condition of license.

PLANT NAME:  
St. Lucie #1

(4-P)

## ENCLOSURE

ACKNOWLEDGED

DO NOT REMOVE

## SAFETY

## FOR ACTION/INFORMATION

## ENVIRO

8/4/76

RJL

ASSIGNED AD:		ASSIGNED AD:	
<input checked="" type="checkbox"/> BRANCH CHIEF:	Ziemann	<input checked="" type="checkbox"/> BRANCH CHIEF:	
<input checked="" type="checkbox"/> PROJECT MANAGER:		<input checked="" type="checkbox"/> PROJECT MANAGER:	
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## INTERNAL DISTRIBUTION

<input checked="" type="checkbox"/> REG FILE	SYSTEMS SAFETY	PLANT SYSTEMS	SITE SAFETY &
<input checked="" type="checkbox"/> NRC PDR	HEINEMAN	TEDESCO	ENVIRO ANALYSIS
I & E	SCHROEDER	BENAROYA	DENTON & MULLER
OELD		LAINAS	
GOSSICK & STAFF	ENGINEERING	IPPOLITO	ENVIRO TECH.
MIPC	MACCARRY	KIRKWOOD	ERNST
CASE	KNIGHT		BALLARD
HANAUER	SIHWEIL	OPERATING REACTORS	SPANGLER
HARLESS	PAWLICKI	STELLO	
			SITE TECH.
PROJECT MANAGEMENT	REACTOR SAFETY	OPERATING TECH.	GAMMILL
BOYD	ROSS	EISENHUT	STEPP
P. COLLINS	NOVAK	SHAO	HULMAN
HOUSTON	ROSZTOCZY	BAER	
PETERSON	CHECK	BUTLER	SITE ANALYSIS
MELTZ		GRIMES	VOLLNER
HELTEMES	AT & I		BUNCH
SKOVHOLT	SALTZMAN		J. COLLINS
	RUTBERG		KREGER

## EXTERNAL DISTRIBUTION

## CONTROL NUMBER

<input checked="" type="checkbox"/> LPDR: Ft. Pierce, Fla.	NAT LAB:	BROOKHAVEN NAT LAB	7785
TIC:	REG. VIE	ULRIKSON(ORNL)	
NSIC:	LA PDR		
ASLB:	CONSULTANTS		
ACRS	CYS HOLDING/SENT		

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DATE

MESSAGE FROM

*L. L. Leskojan*  
Florida Power & Light Company  
PO Box 013100  
Miami, Florida 33101

TO:

NO. OF PAGES 6 PLUS INSTRUCTION SHEET

TELECOPY NUMBER: (305) 552-4640 XEROX 410 - Unattended automatic machine

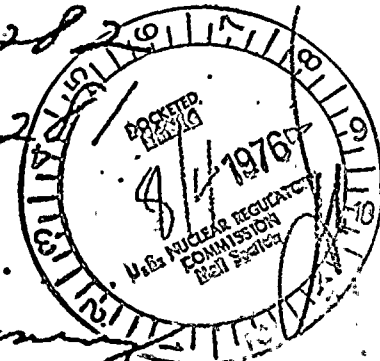
TELECOPY CONFIRMATION NUMBER

(305) 552-3631 (2/28/76)

Regulatory Docket

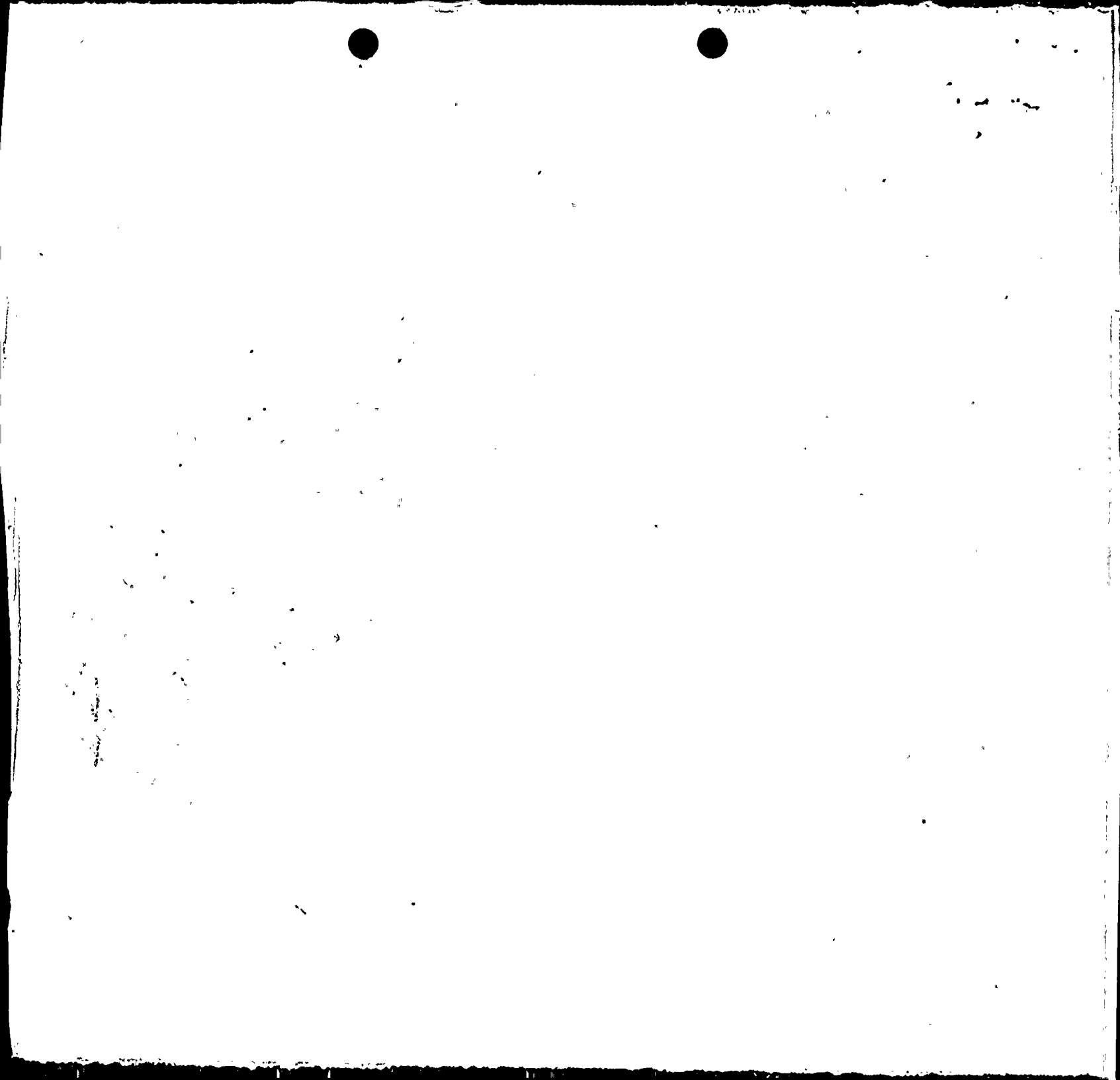
SPECIAL INSTRUCTIONS:

*Two letters - L-76-282  
L-76-282*



*Advance copy - confirming  
signed copies to follow.*

*7785*



August 3, 1976  
L-76-281

Office of Nuclear Reactor Regulation  
Attn: Dennis L. Ziemann, Chief  
Operating Reactors Branch No. 2  
Division of Operating Reactors  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Ziemann:

Re: St. Lucie Unit No. 1  
Operating License DPR-67  
Condition of License J



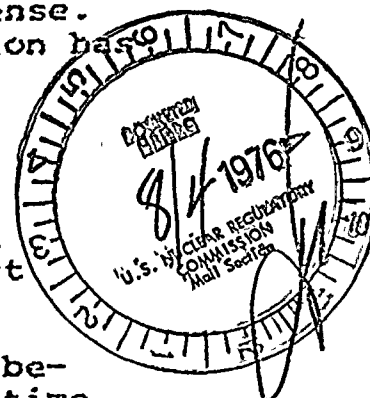
Regulatory Docket File

Florida Power & Light Company (FPL) hereby requests that Section J of Enclosure 1 to the St. Lucie Unit No. 1 Operating License be deleted as a Condition of License. As discussed herein, FPL believes that this Condition has been satisfied and is no longer required.

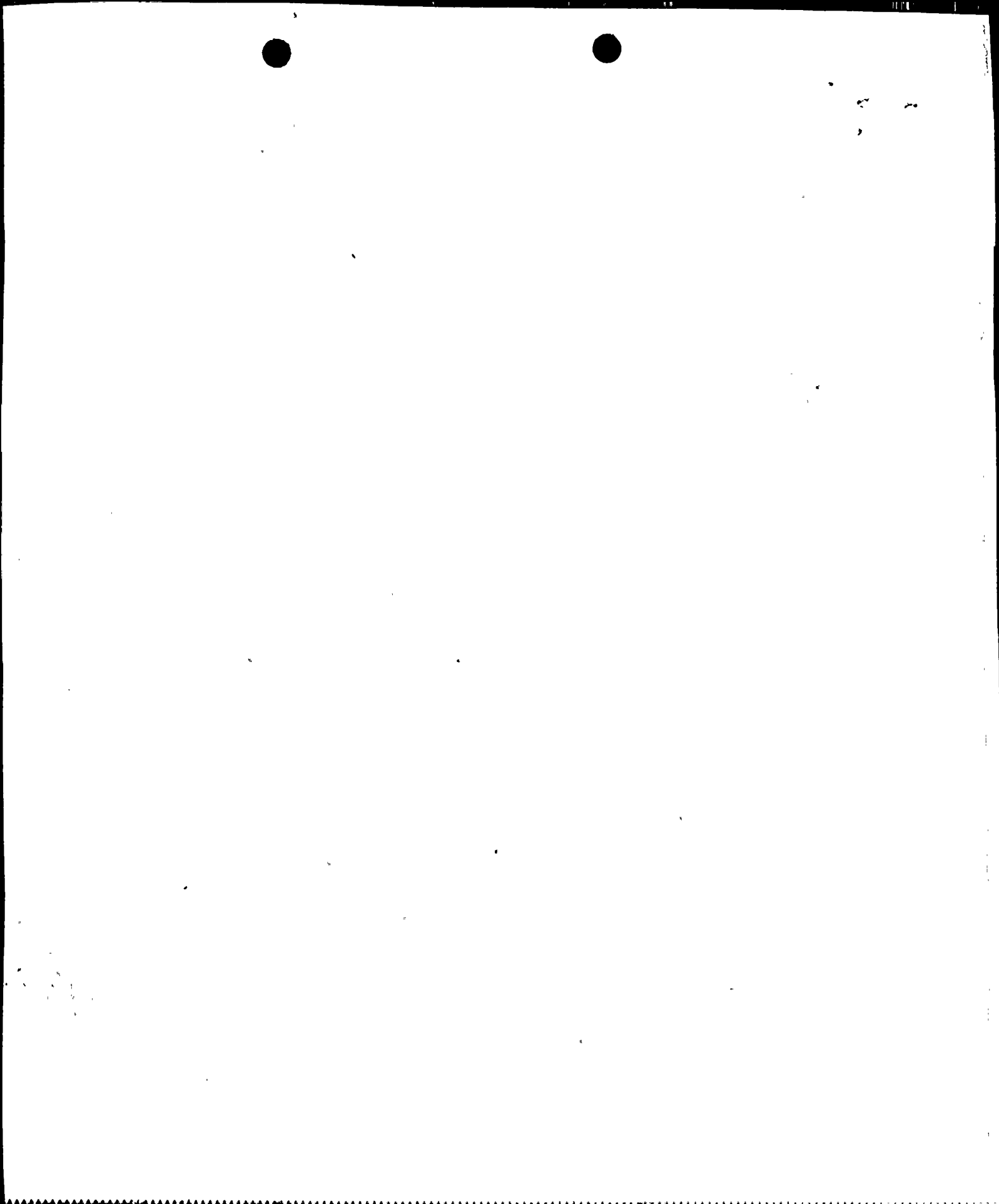
The subject Condition of License reads as follows:

"J. Control Element Drive Mechanism (CEDM) 44 shall be repaired or replaced at the next extended reactor shutdown expected to last at least two weeks."

This Condition was added by Amendment 4 to DPR-67, because FPL was unable to complete the cold rod drop time testing required by a preceding Condition of License. The testing was required to preclude the reactor being made critical under conditions (i.e., cold) which had not first been tested for rod drop times, since it was conceivable that the plant would be in a cold critical condition at some time during its expected service lifetime. This testing was not completed due to difficulty experienced in withdrawing the rod controlled by CEDM 44 in cold condition. The test procedure required that the two fastest rods be tested several times at various flow conditions. It happened that the second fastest rod was that controlled by CEDM 44. Although the rod could not be withdrawn successively in a cold condition in order to complete the required number of tests, it operated satisfactorily at hot operating conditions. Accordingly, the license was conditioned to add Section J to Enclosure 1 of DPR-67 and to delete the authorization for low temperature criticality contained in Technical Specification 3.10.3.



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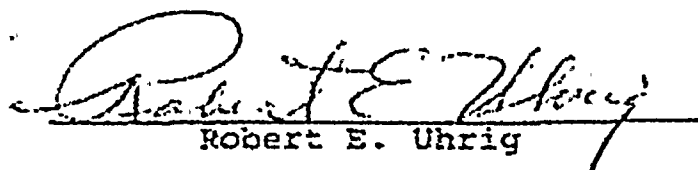


STATE OF FLORIDA     )  
                              )  
COUNTY OF DADE     )     ss.

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.

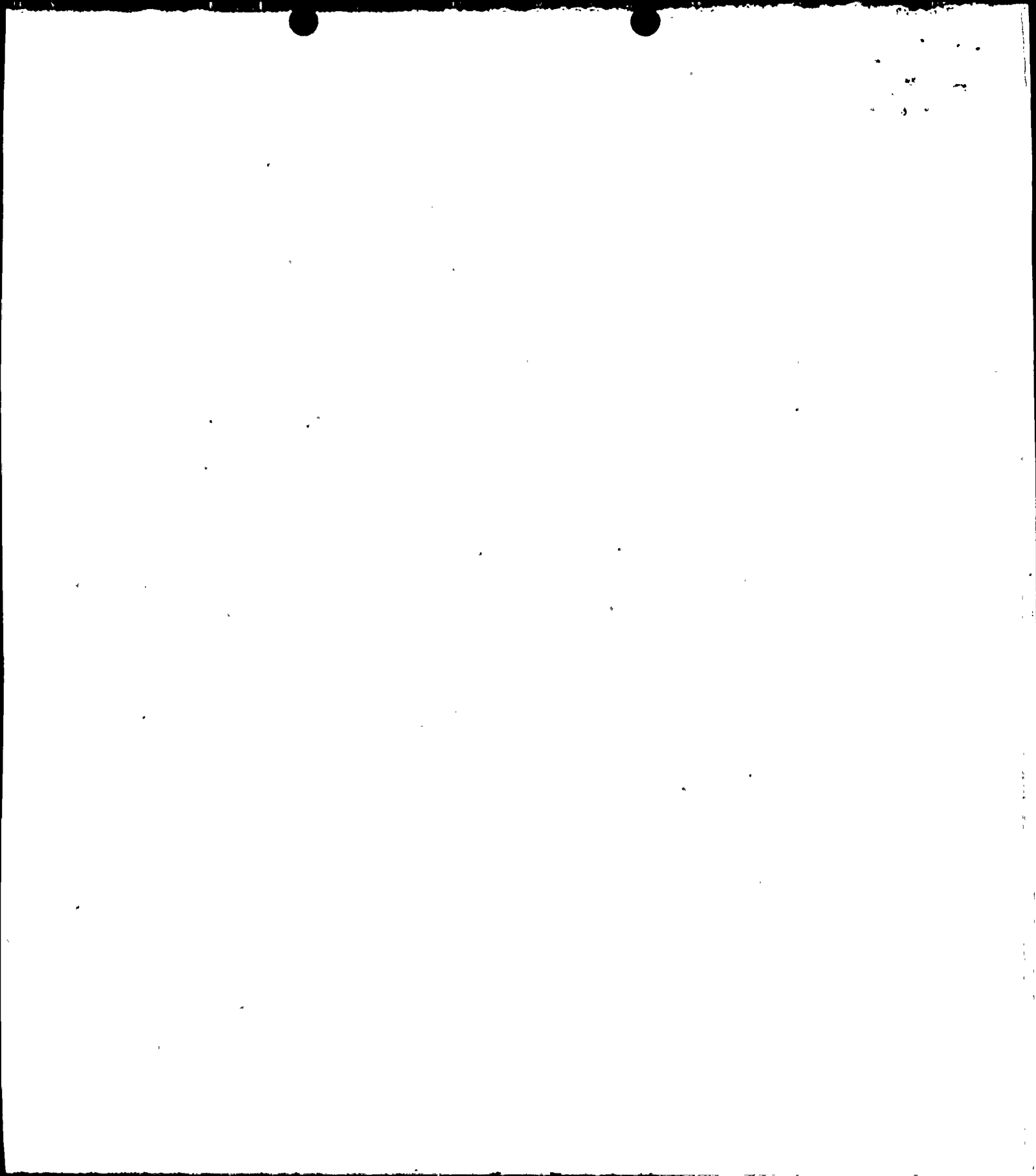
  
Robert E. Uhrig

Subscribed and sworn to before me this

3<sup>rd</sup> day of August, 1976

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

NOTARY PUBLIC STATE OF FLORIDA AT LARGE  
MY COMMISSION EXPIRES NOV. 30 1979  
My commission expires: EXPIRED INFO GENERAL REG. UNDEVELOPED





To: Dennis L. Ziemann  
Re: St. Lucie Unit No. 1  
Operating License DPR-67  
Condition of License J

August 3, 1976

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Since the issuance of Amendment 4 to DPR-67, the performance of the CEDM has improved considerably. Although it initially required heating the RCS to approximately 360°F before the CEDM could be withdrawn consistently, it now reaches this level of operation at approximately 290°F. The rod has been tested on several occasions since the initial cold rod drop time testing. On June 12, 1976, during a maintenance shutdown, and following cooldown to 260°F, the rod was withdrawn three times in succession and dropped once to verify its previous timing. It was then withdrawn and dropped nine times in succession under various flow conditions in accordance with the test procedure. During the heatup back to power on June 18, 1976, the rod was again tested and was withdrawn successfully at 260°F. However, on July 10, 1976, during the shutdown to investigate an observed power distribution anomaly and following cooldown to 260°F, the rod was successfully withdrawn on the first attempt, but could not be fully withdrawn on succeeding attempts. Thus, although considerable improvement has been observed in its withdrawal at low temperature, the CEDM continues to show some inconsistency in its performance.

Despite this inconsistency successive withdrawal of the rod at the test temperature has occurred sufficiently to allow completion of the cold rod drop time testing. These tests establish the rod controlled by CEDM 44 as the fastest rod during successive drops at low temperature under various flow conditions. These data have been reviewed by the Facility Review Group and are available onsite for review by Region II I&E personnel.

Having satisfactorily completed the required testing, the repair of CEDM 44 loses any significance it may have had as a Condition of License. Difficulty in withdrawal at low temperature now has only operational significance since a fully inserted rod is inherently safe. Thus, the repair of CEDM 44 becomes more appropriately a routine maintenance item rather than a Condition of License. Furthermore, the performance of the rod at low temperature does not even have operational significance since FPL has no intention of reinstating Technical Specification 3.10.3 which would allow low temperature criticality.

Although FPL believes that Section J is no longer a necessary Condition of License, FPL does plan to undertake inspection of the mechanism during the present outage. Upon removal of the CEDM upper guide structure, the extension shaft of CEDM 44 will be visually inspected. Following removal of the reactor head, the mechanism will be inspected internally using a



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To: Dennis W. Ziemann  
Re: St. Lucie Unit No. 1  
Operating License DPR-67  
Condition of License J

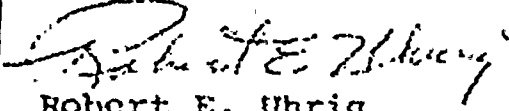
August 3, 1976  
Page -3-

boroscope to determine whether any material obstructions or configurational anomalies exist. The CEDM coils will then be energized and the grippers will be exercised. The boroscope will be used to observe their manner of operation. Flushing will be undertaken as required. Upon completion of this inspection and during the subsequent heatup, CEDM 44 will again be tested at 260°F. The inspection efforts for CEDM 44 are expected to require one week. Since replacement may not be necessary, and since replacement would require two weeks to complete which would, thereby, interfere with the present reactor inspection and testing program (the reactor head will be off for only one week), replacement of CEDM 44 is not planned during this outage. Should the efforts during this outage prove unsuccessful, the mechanism will be tested during the next scheduled refueling outage and replaced if necessary.

All indications are that CEDM 44, which is located in the northeast quadrant of the core, is not a factor in the power distribution anomaly which has been observed in the northwest quadrant of the core.

On the basis of the foregoing, FPL believes that it has satisfied the requirements leading to the incorporation of Section J into the St. Lucie Unit No. 1 Operating License and that future repair or replacement of CEDM 44 is a routine maintenance matter. This repair is no different from that of any other CEDM which fails to operate properly during the service life of the reactor. Repair or replacement of CEDM 44 will be undertaken in a manner which will not impact the present schedule for inspection and testing to resolve the observed power distribution anomaly. Accordingly, FPL requests that Section J of Enclosure J to the St. Lucie Unit No. 1 Operating License be deleted.

Yours very truly,

  
Robert E. Uhrig  
Vice President

REU/LLL/hlc

cc: Norman C. Moseley, Region II  
Jack R. Newman, Esq.

TEL-COM-BR-DAO

1976 AUG 3 AM 11 37

U.S. NUCLEAR REGULATORY  
COMMISSION

