



April 1, 1976  
L-76-151

Director of Nuclear Reactor Regulation  
Attention: Mr. Roger S. Boyd, Director  
Division of Project Management  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Boyd:

Re: St. Lucie Unit 1  
Docket No. 50-335  
Preoperational Testing per  
Regulatory Guide 1.68



To satisfy the requirements of item B.2 of Enclosure 1 to Facility Operating License DPR-67, Florida Power and Light Company (FPL) hereby submits a report which demonstrates that tests to be conducted during power ascension testing meet the intent of sections D.1.c and D.1.d of Appendix A to Regulatory Guide 1.68.

Regulatory Guide 1.68 Appendix A Section D.1.c calls for a test demonstrating "plant response to load swings, including response to automatic dispatcher control, if applicable (50%, 100%)."  
(Automatic dispatcher control is not applicable to St. Lucie Unit 1.) Section D.1.d calls for a test demonstrating "automatic control system checkout - steam generator level control, automatic rod control, turbine control (25%)."

We will satisfy the requirements of Sections D.1.c and D.1.d by performing tests in accordance with revised preoperational test procedure no. 1400084, entitled "Automatic Control System Checkout, Steam Generator Level Control, CEA Regulating System, Automatic Turbine Control, and Load Swing Test." In addition, preoperational test procedure no. 0110090, entitled "10% Load Reduction - Turbine Runback Test," will provide further data demonstrating plant response during a load swing.

Our NSSS vendor has recommended that, due to fuel preconditioning considerations, the performance of these tests take place after the 100% test plateau has been reached. Therefore, we do not plan to conduct the tests during the initial ascent to 100% rated power. It should be noted that, during the initial power ascension, data will be taken every four (4) hours in accordance with preoperational procedure no. 0010180, which is the Power Ascension Sequencing Document. This data will demonstrate plant response during transients and normal maneuvering and reveal problems which may be occurring. In addition, plant control systems are monitored during test trips scheduled for the initial ascent to 100% power.



Director of Nuclear Reactor Regulation  
Attention: Mr. Roger S. Boyd  
Page Two  
April 1, 1976

Preoperational test no. 1400084 is to be performed at 25%, 50%, and 90% rated power. The test demonstrates the automatic capabilities of the CEA regulating system, the steam generator feedwater control system, and the turbine control system and documents that all three systems give adequate and stable responses during steady state and expected transient conditions. Strip chart recorders are utilized on these and other systems so that the plant response to load swings of up to 10% can be analyzed. Preoperational test no. 0110090 gives us an additional 10% load swing at 80% rated power where brush recorders are used to analyze plant response. We consider these tests and the consequent data to satisfy Regulatory Guide 1.68 Appendix A sections D.1.c and D.1.d.

Copies of preoperational test procedures 1400084, 0110090, and 0010180 are attached as Attachments 1, 2, and 3, respectively.

Very truly yours,



Robert E. Uhrig  
Vice President

REU:MAS:sb

cc: Mr. Norman C. Moseley (w/o attachments)  
Jack R. Newman, Esquire (w/o attachments)

OK