

Office of Nuclear Reactor Regulation
Attention: Mr. Darrell G. Eisenhut, Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Eisenhut:

Re: St. Lucie Unit 1
Docket No. 50-335
NUREG 0737 Technical Specifications

This letter is submitted in response to Generic Letter No. 82-16 which requested Technical Specifications for items required by NUREG 0737 for implementation by December 31, 1981.

Enclosure 1 to Generic Letter No. 82-16 lists eleven items to be addressed. The items, and our position on each, are as follows:

(1) STA Training (I.A.1.1.3)

Technical Specification Amendment No. 37, approved January 19, 1981, addresses this requirement.

(2) Limit Overtime (I.A.1.3)

As stated in our letter L-82-417 of September 30, 1982, it is our position that overtime limitations are adequately enforced by incorporation in the administrative procedures and amending the Technical Specifications is unnecessary at this time. Our overtime policies were accepted by the NRC in letter R. A. Clark to R. E. Uhrig, dated February 4, 1982

(3) Short Term Auxiliary Feedwater System Evaluation (II.E.1.1)

The existing St. Lucie Unit 1 auxiliary feedwater system Technical Specifications limiting conditions of operation and surveillance requirements are similar to that of other safety related systems.

(4) Safety Grade AFW System Initiation & Flow Indication (II.E.1.2)

St. Lucie Unit 1 Technical Specification Amendment No. 37 covers safety grade AFW System Initiation and Flow Indication. The amendment was approved by the NRC on January 19, 1981.

A046

(5) Dedicated Hydrogen Penetrations (II.E.4.1)

St. Lucie has internal (to Containment) hydrogen recombiners. There also is a hydrogen purge system installed and the existing St. Lucie Unit 1 containment systems Technical Specification subjects the hydrogen purge valves to the criteria specified in Appendix J of 10 CFR 50.

(6) Containment Pressure Setpoint (II.E.4.2.5)

We provided an analysis justifying our present setpoint in FPL letter L-81-163, dated April 9, 1981. This was accepted by the NRC in letter R. A. Clark to R. E. Uhrig dated January 20, 1982.

(7) Containment Purge Valve (II.E.4.2.6)

We provided a response to your containment purge review model Technical Specifications in FPL letter L-82-317, dated July 30, 1982.

(8) Radiation Signal on Purge Valves (II.E.4.2.7)

The existing St. Lucie Unit 1 Containment Isolation Signal (CIS) Technical Specifications already require that, within 24 hours, the plant begin proceeding to cold shutdown should all containment radiation monitors fail. CIS is initiated by high radiation (and other signals) and closes the purge valves.

(9) Upgrade B&W AFW System (II.K.2.8)

(10) Not included

(11) B&W Thermal-Mechanical Report (II.K.2.13)

Items (9) and (10) are not applicable to CE plants.

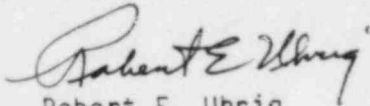
(12) Reporting SV and RV Failures and Challenges (II.K.3.3)

St. Lucie Unit 1 previously committed to annual reporting of safety and relief valve challenges in our letter L-80-184 of June 13, 1980. The purposed Unit 2 Technical Specifications require monthly reporting of such events. Future technical specification revisions to make the two unit's technical specifications more compatible will incorporate this requirement into the Unit 1 Technical Specifications. We intend on providing these revisions following finalization of the St. Lucie Unit 2 Technical Specifications.

(13) Anticipatory Trip on Turbine Trip (II.K.3.12)

This appears to be for plants with a Westinghouse NSSS and thus not applicable to St. Lucie. However, the existing St. Lucie Unit 1 Technical Specifications adequately cover the anticipatory reactor trip on turbine trip.

Very truly yours,



Robert E. Uhrig
Vice President
Advanced Systems and Technology

REU/JEM/js

cc: Mr. James P. O'Reilly, Region II
Harold F. Reis, Esquire