







Florida Power & Light Company, 6351 S. Ocean Drive, Jensen Beach, FL 34957

April 29, 1999

L-99-107  
10 CFR 50.4  
10 CFR 2.201

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

RE: St. Lucie Units 1 and 2  
Docket Nos. 50-335 and 50-389  
Notice of Violation and Exercise of Enforcement  
Discretion (NRC Inspection Report 98-14)

By letter dated March 31, 1999 (Luis A. Reyes to T. F. Plunkett), the NRC provided to Florida Power & Light Company (FPL) a Notice of Violation and Exercise of Enforcement Discretion relating to the Fire Protection Functional Inspection (FPFI) that was conducted at St. Lucie Plant in early 1998. The purpose of this letter is confirm the NRC Staff's conclusions relative to the cited violation and the two non-cited violations and to reiterate FPL's position concerning the consideration of multiple spurious actuations in the event of a fire.

FPL has reviewed the March 31, 1999, letter and determined that it accurately reflects FPL's position and corrective actions relative to the Notice of Violation included as Enclosure 1 to the March 31, 1999, letter. Additionally, FPL has confirmed that the NRC's understanding of planned and completed corrective actions for the two non-cited violations discussed in the March 31, 1999, letter is also correct.

FPL respectfully disagrees with the first subpart of the apparent violation involving spurious operation analysis and protection methods for safe shutdown capability. The licensing bases of St. Lucie Units 1 and 2 do not require consideration of multiple spurious actuations of equipment in the event of a fire, other than for high-low pressure interfaces. Further, the Staff's position that the effects of fire induced multiple spurious actuations must be analyzed is not consistent with previously issued guidance for implementation of NRC fire protection requirements. Accordingly, no violation occurred. FPL believes that technical resolution of issues relating to fire induced multiple spurious actuations should be the subject of continuing discussions between NRC and the Nuclear Energy Institute. FPL agrees with the second subpart of that apparent violation. FPL also concurs with NRC's conclusions that the issue is of low risk significance and that FPL evaluated the effect of this condition on the plant.

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Please contact us if you have additional questions about these issues.

Very truly yours,



Thomas F. Plunkett  
President  
Nuclear Division

TFP/JAS/MSR/EJW

cc: Regional Administrator, Region II, USNRC  
Senior Resident Inspector, USNRC, St. Lucie Plant

