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ACCESSION NBR:9905050166 DOC.DATE: 99/04/29 NOTARIZED: NO DOCKET # FACIL:50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co. 05000335 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389 AUTH.NAME AUTHOR AFFILIATION PLUNKETT,T.F. Florida Power & Light Co. RECIP.NAME RECIPIENT AFFILIATION Records Management Branch (Document Control Desk)							
SUBJECT: Provides confirmation of NRC staff conculsions relative to C							
cited violation & non-cited violations in insp rept 98-14 &							
multiple gourious actuations in event of fire							
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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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St. Lucie Units 1 and 2 Docket Nos. 50-335 and 50-389 L-99-107 Page 2

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

