



February 21, 2000

L-2000-49  
10 CFR 50.4

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

RE: St. Lucie Units 1 and 2  
Docket Nos. 50-335 and 50-389  
Request for Revised Implementation Period  
Unit 1 Amendment 164 and Unit 2 Amendment 105

On February 15, 2000, the NRC issued St. Lucie Unit 1 License Amendment 164 and Unit 2 License Amendment 105 with implementation periods of thirty days from the date of issuance. Florida Power & Light Company (FPL) requested, pursuant to Section 2.4.3 of Attachment 1 of NRC Office Letter 803, *Guidance for Processing License Amendments*, a sixty day implementation period for these amendments. As permitted by Office Letter 803, FPL notified the NRC Project Manger and Back-up Project Manager informally, via electronic mail, of the requested implementation period on November 30, 1999. Effective December 1, 1999, the NRC changed the St. Lucie Project Manager and FPL's request was lost in the transition.

Please revise the implementation period for these license amendments to sixty days from the date of receipt. This is the first risk-informed license amendment increasing the allowed outage time. The changes modify the Technical Specifications to extend the allowed outage time (AOT) for a single low pressure safety injection (LPSI) train from 72 hours to 7 days. As part of the amendment approval, FPL committed to implement a Configuration Risk Management Program (CRMP) that puts a procedure-based probabilistic risk assessment process in place that ensures FPL assesses the overall impact of plant maintenance on plant risk. FPL needs the additional time to implement the license amendment to allow time to finalize the CRMP and train the station personnel in its use.

In the future, FPL requests that all license amendments for St. Lucie Units 1 and 2 be issued with a standard implementation period of sixty days from receipt. FPL will notify the NRC if a longer implementation period is required for a specific license amendment. Please contact us if there are any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Rajiv S. Kundalkar', is written over the typed name.

Rajiv S. Kundalkar  
Vice President  
St. Lucie Plant

RSK/GRM

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