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Florida Power & Light Company, P. O. Box 14000, Juno Beach, FL 33408-0420

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U.S. Nuclear Regulatory Commission
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DOCKET NUMBER
PETITION RULE PRM 50-69
(65FR6044)

SUBJECT: Florida Power & Light Company Comments
Petition for Rulemaking by Westinghouse Electric Company LLC, on 10 CFR 50, Appendix G, Fracture Toughness Requirements (Fed. Reg. 6044)

Florida Power & Light Company (FPL), the owner and operator of the St. Lucie Nuclear Plant, Units 1 and 2, and the Turkey Point Nuclear Plant, Units 3 and 4, hereby submits the following comments on the subject petition for rulemaking. The petition seeks to remove footnotes 2 and 6 from Table 1 in 10 CFR Part 50, Appendix G. The result would be the elimination of requirements related to the metal temperature of the closure head flange and vessel flange regions of the reactor pressure vessel.

FPL supports this petition and concurs with the letter of support issued by the Nuclear Energy Institute. FPL is a member of the Westinghouse Owners Group and the B&W Owners Group (B&WOG) Reactor Vessel Working Group which have also endorsed the technical merits of the petition.

FPL has recently developed Pressure–Temperature limit curves using the K_{IC} reference fracture toughness curve rather than K_{IR} curve. K_{IC} results in higher allowable pressures for any given primary system temperature. However, the pressure vessel flange material temperature limit of Appendix G would have prevented FPL from realizing this improvement in the pressure-temperature limits because the flange becomes controlling in the low temperature area of interest. Using the Westinghouse WCAP-15315, "Reactor Vessel Closure Head/Flange Requirements Evaluation for Operating PWR and BWR Plants," by exemption to eliminate the flange restriction, allowed the differential pressure between the LTOP setpoint and the reactor coolant pump seal limit to be increased significantly. This increase results in a positive improvement to safety by reducing the possibility of inadvertent PORV actuation or pump damage.

The B&WOG Reactor Vessel Working Group has confirmed that the technical basis provided in the petition generically covers the plants in the Working Group. Given the generic nature of that information, a rule change is preferable to individual licensees pursuing exemptions to the requirements of 10 CFR 50 Appendix G. The proposed rule change should result in licensees avoiding the preparation of plant-specific exemption requests.

We appreciate the opportunity to comment on this important issue.

Sincerely yours,

J. A. Stall
Vice President
Nuclear Engineering

TEMPLATE=SECY-067

SECY-02