



May 29, 2001

L-2001-116
10 CFR 70.53

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
Nuclear Material Inventories Administrative Clarification

A recent Florida Power & Light Company (FPL) quality assurance (QA) audit of the Special Nuclear Material Report activities found administrative coding inconsistencies in the implementation of the Composition/Facility codes described in NUREG/BR-0007, Revision 3. The proposed clarification does not affect previously verified inventories of special nuclear materials. The NUREG/BR-0007, Revision 3 definitions of the two codes of concern are:

Code 861 – *In Cooling*: For irradiated Special Nuclear Material or source material in cooling basins held for future recovery or disposal.

Code 864 – *Material Not in Process*: Special Nuclear Material in all unopened receipts, sealed sources, and ultimate product maintained under tamper-safing.

Neither of these two codes fits exactly the situation for a fresh fuel assembly in the spent fuel pool. When in the spent fuel pool, the fresh fuel assembly is not being held for future recovery nor is it being held in unopened receipts. Therefore, for fresh fuel in the spent fuel pool, the applicable codes' definitions have resulted in inconsistency by FPL in assigning Composition/Facility codes.

As a result, FPL will adopt the following Composition/Facility Code convention:

Upon receipt, fuel assemblies will be classified as, *Material not in Process* (i.e., Composition/Facility Code 864).

When the fuel assemblies are irradiated for the first time (i.e., critical), they will be transferred to, *In Reactor and Critical Assemblies* (i.e., Composition/Facility Code 860).

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Code 860 - *In Reactor and Critical Assemblies*: Special Nuclear Materials in reactors, test piles, critical assemblies, and Special Nuclear Materials being used for radiation studies.

Then, based on the reactor shutdown date, the fuel assemblies permanently discharged will be transferred to, *In Cooling* (i.e., Composition/Facility Code 861). However, fuel assemblies moved to the spent fuel pool but scheduled to return to the reactor, will be left under Code 860, *In Reactor and Critical Assemblies*.

Please contact us if this interpretation is not acceptable.

Very truly yours,



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RSK/GRM

cc: Regional Administrator, Region II, USNRC
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