

February 11, 2003

LICENSEE: Florida Power and Light Company  
FACILITY: St. Lucie Nuclear Station, Units 1 and 2  
SUBJECT: SUMMARY OF TELEPHONE CALLS BETWEEN THE NRC AND THE FLORIDA POWER AND LIGHT COMPANY CONCERNING DRAFT SUPPLEMENTAL RESPONSES TO REQUESTS FOR ADDITIONAL INFORMATION PERTAINING TO THE ST. LUCIE, UNITS 1 AND 2, LICENSE RENEWAL APPLICATION (TAC NOS. MB3406 AND MB3412)

The NRC staff and representatives of the Florida Power and Light Company (FPL or the applicant) participated in telephone calls on December 3 and 23, 2002, January 3 and 31, and February 3, 2003, to discuss the applicant's draft supplemental responses to the staff's requests for additional information (RAIs) and proposed open items in the associated safety evaluation report. On the basis of these discussions, the applicant revised and submitted some of its draft supplemental responses in letters dated November 27 and December 23, 2002. A telephone call summary, which identifies the supplemental responses discussed and the applicant's planned actions, is provided in Enclosure 1. A list of the participants in the meeting is provided in Enclosure 2. The FPL draft supplemental responses and the associated RAIs are provided in Enclosure 3. FPL has had an opportunity to review and comment on this summary.

*/RA/*

Noel F. Dudley, Senior Project Manager  
License Renewal Section  
License Renewal and Environmental Impacts Program  
Division of Regulatory Improvement Programs  
Office of Nuclear Reactor Regulation

Docket Nos.: 50-335 and 50-389

Enclosures: 1. Telephone Call Summary  
2. Participants in Meetings  
3. Draft Supplemental Response Letter (ML023220066)

cc w/enclosures 1 and 2: See next page

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OFFICE	PM:RLEP:DRIP	LA:RLEP:DRIP	SC:RLEP:DRIP
NAME	NDudley	EHylton	SLee
DATE	2/10/03	2/11/03	2/11/03

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DISTRIBUTION: Summary of Telephone Calls w/FPL, Dated: February 11, 2003

**HARD COPY**

RLEP RF

**E-MAIL:**

PUBLIC

J. Johnson

W. Borchardt

D. Matthews

F. Gillespie

C. Grimes

J. Strosnider (RidsNrrDe)

R. Barrett

E. Imbro

G. Bagchi

K. Manoly

W. Bateman

J. Calvo

C. Holden

P. Shemanski

H. Nieh

G. Holahan

S. Black

B. Boger

D. Thatcher

G. Galletti

B. Thomas

R. Architzel

J. Moore

R. Weisman

M. Mayfield

A. Murphy

W. McDowell

S. Droggitis

S. Duraiswamy

R. Assa

RLEP Staff

-----

R. Correia

E. Brown

L. Wert (RII)

C. Julian (RII)

Mr. J. A. Stall  
Florida Power and Light Company  
cc:  
Senior Resident Inspector  
St. Lucie Plant  
U.S. Nuclear Regulatory Commission  
P.O. Box 6090  
Jensen Beach, FL 34957

Craig Fugate, Director  
Division of Emergency Preparedness  
Department of Community Affairs  
2740 Centerview Drive  
Tallahassee, FL 32399-2100

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

Mr. Douglas Anderson  
County Administrator  
St. Lucie County  
2300 Virginia Avenue  
Fort Pierce, Florida 34982

Mr. William A. Passetti, Chief  
Department of Health  
Bureau of Radiation Control  
2020 Capital Circle, SE., Bin #C21  
Tallahassee, FL 32399-1741

Mr. Donald E. Jernigan, Site Vice President  
St. Lucie Nuclear Plant  
6351 South Ocean Drive  
Jensen Beach, FL 34957

Mr. R. E. Rose  
Plant General Manager  
St. Lucie Nuclear Plant  
6351 South Ocean Drive  
Jensen Beach, FL 34957

Mr. Kelly J. Korth  
Licensing Manager  
St. Lucie Nuclear Plant  
6351 South Ocean Drive  
Jensen Beach, FL 34957

## **ST. LUCIE PLANT**

Mr. William Jefferson  
Vice President, Nuclear Operations Support  
P.O. Box 14000  
Juno Beach, FL 33408-0420

Mr. Don Mothena  
Manager, Nuclear Plant Support Services  
Florida Power & Light Company  
P.O. Box 14000  
Juno Beach, FL 33408-0420

Mr. Rajiv S. Kundalkar  
Vice President - Nuclear Engineering  
Florida Power & Light Company  
P.O. Box 14000  
Juno Beach, FL 33408-0420

Mr. J. Kammel  
Radiological Emergency Planning  
Administrator  
Department of Public Safety  
6000 SE. Tower Drive  
Stuart, FL 34997

Attorney General  
Department of Legal Affairs  
The Capitol  
Tallahassee, FL 32304

Mr. Steve Hale  
St. Lucie Nuclear Plant  
Florida Power and Light Company  
6351 South Ocean Drive  
Jensen Beach, FL 34957-2000

Mr. Alan P. Nelson  
Nuclear Energy Institute  
1776 I Street, NW., Suite 400  
Washington, DC 20006-3708

David Lewis  
Shaw Pittman, LLP  
2300 N Street, NW.  
Washington, DC 20037

**TELEPHONE CALLS WITH FLORIDA POWER AND LIGHT COMPANY  
ST. LUCIE, UNITS 1 AND 2  
LICENSE RENEWAL APPLICATION  
DECEMBER 3 and 23, 2002, JANUARY 3 and 31, and FEBRUARY 3, 2003**

The Nuclear Regulatory Commission (NRC) staff participated in telephone calls with representatives of Florida Power and Light Company (FPL or the applicant) on December 3 and 23, 2002, January 3 and 31, and February 3, 2003, to discuss the applicant's draft supplemental responses to the staff's requests for additional information (RAIs) associated with the St. Lucie, Units 1 and 2, license renewal application (LRA).

On the basis of the discussions, the staff was able to better understand the applicant's technical bases; however, no technical issues were resolved. In some cases, the applicant identified actions that would enhance its supplemental RAI responses. The staff did not provide any approval for or agreement with the technical information provided in the draft supplemental responses.

The applicant submitted supplemental responses to RAIs in two letters dated November 29 and December 23, 2002. A summary of the RAIs discussed and the applicant's proposed actions are presented below. The complete RAIs and draft supplemental responses are available in Enclosure 3 of this telephone call summary.

**Responses to Requests for Additional Information**

RAI 2.3.3-15

The staff and the applicant discussed the aging program that the applicant had identified for the hydropneumatic tank in its letter dated November 27, 2002. The applicant agreed to credit the fire protection program for managing the internal environment for the hydropneumatic tank and related components instead of the systems and structures monitoring program. The applicant documented this proposed change in a letter dated December 23, 2002.

RAI 3.5-12

The staff and the applicant discussed the RAI 3.5-15 statement in the applicant's letter, dated September 26, 2002, that cracking of reinforced masonry block walls is not an aging effect requiring management. The applicant noted that the statement was inconsistent with its response to RAI 3.5-1 contained in its letter dated November 27, 2002. In a letter dated December 23, 2002, the applicant revised its response to RAI 3.5-12 to be consistent with the response to RAI 3.5-1.

RAI 3.6-1

The staff and the applicant discussed the response to this RAI, contained in the applicant's letter dated November 27, 2002, concerning aging management programs for fuse holders. The staff stated that it would review the applicant's response after the interim staff guidance on fuse holders is issued.

### RAI 2.3.1-2

The staff and the applicant discussed the response to this RAI, contained in the applicant's letter dated October 3, 2002, concerning the lack of an aging management program for the Alloy 82/182 thermal sleeve welds in the pressurizer surge and spay lines. The staff plans to address this concern as part of its review of Alloy 82/182 components in the reactor coolant system.

## **Proposed Safety Evaluation Report Open Items**

### Confirmatory Item 2.3.3.7-1

The staff and the applicant discussed the applicant's response to RAI 2.3.3-4, contained in a letter dated October 3, 2002. The RAI requested justification as to why the piping and valves between the spent fuel pool and the refueling water storage tank were considered to be outside the scope of license renewal and not subject to an aging management review. The applicant's response provided the design basis for the intake cooling water makeup system to the spent fuel pool.

Disposition: The applicant committed to resubmit its response to RAI 2.3.3-4. At the request of the staff, the applicant agreed to remove the paragraphs that contain the applicant's assessment of the plant design and to state that the intake cooling water makeup system for the spent fuel pool meets the scoping requirement of 10 CFR 54.4. This is a confirmatory item 2.3.3.7-1 in the staff's safety evaluation report (SER) associated with the St. Luce Units 1 and 2 license renewal application.

### Confirmatory Item 3.0.2.2-1

The staff and the applicant discussed the documentation of aging management programs that are claimed to be consistent with the aging management programs described in the Generic Aging Lessons Learned (GALL) Report. The descriptions of the applicant's aging management programs are in Appendix B of the license renewal application. However, the Final Safety Analysis Report (FSAR) supplements in Appendix A of the license renewal application do not identify the GALL aging management programs that are credited.

Disposition: The applicant committed to include the GALL aging management programs in the FSAR supplements for those aging management programs that are consistent with GALL. This is confirmatory item 3.0.2.2-1 in the SER.

### Proposed Confirmatory Item 3.1.0.3-1

The staff identified an issue concerning two attributes of the Small Bore Class 1 Piping Inspection AMP (i.e. Detection of Aging Effects, and Monitoring and Trending). The applicant committed to submit risk-informed methodologies, which will be used to determine the sample locations and sample size for small bore piping inspections, to the NRC for review and approval. The potential exists for risk-informed methodologies to "screen out" the volumetric examinations of the small bore piping based on risk information, and eliminate volumetric examinations of small bore Class 1 piping components. The staff requests confirmation that

the risk-informed methodologies will only be used to establish the minimum number and locations of small bore Class 1 piping full penetration butt welds and will not be used as a basis to eliminate the volumetric examinations of welds.

Disposition: In Section 3.1.5 of Appendix B on page B-19 of the LRA, the applicant states that it will provide the NRC with a report describing the small bore Class 1 piping inspection plan prior to the implementation of this inspection. The applicant clarified that the risk-informed methodology will be used to establish the minimum number and location of inspections, but will not eliminate the volumetric examination of welds. On the bases of the information and commitments in the LRA, the staff plans to eliminate this open item. The staff will consider this information in its review.

#### Proposed Open Item 3.1.0.3-2

The staff identified an issue concerning two attributes of the Small Bore Class 1 Piping Inspection AMP, (i.e. Detection of Aging Effects, and Monitoring and Trending). The applicant committed to submit risk-informed methodologies, which will be used to determine the sample locations and sample size for small bore piping inspections, to the NRC for review and approval. The staff requests a commitment from the applicant concerning the date when the risk-informed methodologies will be submitted for review and approval. The staff also requests a commitment from the applicant that the risk-informed methodologies will include the following information:

- a technical summary of what the risk-informed methodologies involved
- the minimum number of small bore Class 1 piping full penetration butt welds that will be selected for volumetric examination and the locations for the examinations, consistent with the risk-informed methodologies

appropriate alternative program provisions against 10 CFR 50.55a(a)(3)(i) if the risk-informed methods and locations for the small bore piping examinations are to be included as part of a risk-informed inservice inspection program that is part of a 10 CFR 50.55a(a)(3)(i) alternative program request

Disposition: In Section 18.1.5 of Appendix A1, on page A1-34 and Section 18.1.4 of Appendix A2, and on page A2-31 of the LRA, the applicant states that it will provide the NRC with a report describing this inspection plan prior to its implementation. The applicant committed to implement the small bore Class 1 piping inspection prior to the end of the initial operating term of St. Lucie Units, 1 and 2, respectively. The staff will consider this information in its review.

#### Proposed Open Item 3.1.0.7-1

The applicant indicated that it has access to the EPRI Materials Reliability Project (MRP) products related to reactor vessel internals, as they are completed. The MRP strategy is to evaluate potential aging mechanisms and their effects on specific reactor vessel internals components by evaluating parameters such as fluence, material properties, stress, etc. Critical locations can, thereby, be identified and tailored inspections can be conducted on either an integrated industry, or plant-specific basis. With respect to dimensional changes due to void

swelling, the applicant indicated that as the void swelling “white paper” (including available data and effects on RV internals) is completed, it will evaluate the results and factor them into the RV internals inspection program, as applicable. However, the staff believes that, should industry data or other evaluations indicate that the above-mentioned inspections are insufficient and need to be modified, the applicant should provide plant-specific justification to demonstrate the basis for any proposed modification.

Disposition: In Appendix B on page B-16 of the LRA, the applicant commits to supplement the reactor vessel internals inspection program and to submit an integrated report to the NRC prior to the end of the initial operating term for St. Lucie, Unit 1. The report will summarize the understanding of the aging effects applicable to the reactor vessel internals and will contain a description of the St. Lucie inspection plan, including methods for detection and sizing of cracks and acceptance criteria. The staff will consider this information in its review.

#### Proposed Open Item 3.1.1.2-1

The applicant needs to justify why it does not consider loss of mechanical closure integrity due to stress relaxation to be an applicable effect for the stainless steel and carbon steel non-class 1 bolting materials.

Disposition: In Section 5.4 on pages C-16 and C-17 of Appendix C of the LRA, the applicant explains why aging mechanisms associated with loss of preload for non-Class 1 components are not considered to require management. The applicant stated that, since the ASME Code does not consider gaskets, packing, seals, and O-rings to perform a pressure-retaining function, these components are typically not considered to require management for non-Class 1 components during the period of extended operation. The applicant also described its responses to NRC IE Bulletin 82-02, “Degradation of Threaded Fasteners in the Reactor Coolant Pressure Boundary of PWR Plants,” and NRC Generic Letter 91-17, Generic Safety Issue 29, “Bolting Degradation or Failure in Nuclear Power Plants.” The staff will consider this information in its review.



**SAFETY EVALUATION REPORT WITH OPEN ITEMS  
ST. LUCIE LICENSE RENEWAL APPLICATION  
PARTICIPANTS IN TELEPHONE CALLS**

**DECEMBER 3, 2002, TELEPHONE CALL**

NRC Staff Participants

Noel Dudley  
Renee Li  
Cliff Munson

Florida Power and Light Participants

Steve Hale  
Tony Menocal  
Bruce Beisler

**DECEMBER 23, 2002, TELEPHONE CALL**

NRC Staff Participants

Noel Dudley  
Paul Schemanski  
Duc Nguyen

Florida Power and Light Participants

Steve Hale

**JANUARY 3, 2003, TELEPHONE CALL**

NRC Staff Participants

Noel Dudley  
James Medoff  
Meena Khanna

Florida Power and Light Participants

Steve Hale  
Tony Menocal  
Howard Onorato

**JANUARY 31, 2003, TELEPHONE CALL**

NRC Staff Participants : Noel Dudley  
Florida Power and Light Participants: Steve Hale

**FEBRUARY 3, 2003, TELEPHONE CALL**

NRC Staff Participants: Noel Dudley and Steve Jones  
Florida Power and Light Participants: Steve Hale