Florida Power & Light Company, 6501 S. Ocean Drive, Jensen Beach, FL 34957

FPL

April 18, 2003

L-2003-101
EA-03-009(IV)(F)(2)

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

Re: St. Lucie Unit 2
Docket No. 50-389
Order (EA-03-009) Relaxation Requests 1 and 2
Examination Coverage of Reactor Pressure Vessel
Head Penetration Nozzles and Visual Inspection - Supplement

On February 11, 2003, the NRC issued Order (EA-03-009) requiring specific inspections of the reactor pressure vessel (RPV) head and associated penetration nozzles at pressurized water reactors. On March 28, 2003, pursuant to the procedure specified in Section IV, paragraph F of the Order, Florida Power & Light Company (FPL) requested relaxation from the requirements specified in Section IV, paragraph C.(1)(b)(i) for St. Lucie Unit 2 for the reactor pressure vessel head (RPVH) penetration nozzles for which ultrasonic testing requirements can not be completed as required. Relaxation was also requested from the requirements specified in Section IV, paragraph C.(1)(a) for an area of the reactor head surface that is inaccessible for visual inspection. On April 14, 2003, FPL met with the NRC technical staff to discuss the FPL relaxation requests.

In support of Relaxation Request No. 2, Attachment 1 provides the supplemental information requested the by the NRC at the April 14, 2003 meeting with regard to the accessibility for visual examination of the RPVH area between the lower edge of the incore instrument (ICI) nozzles and the vertical reflective metal insulation inside the shroud ring.

In support of Relaxation Request No. 1 (penetration nozzles for which ultrasonic testing requirements can not be completed as required), Enclosure 1 provides 4 copies (3 bound and 1 unbound) of the proprietary version of Westinghouse Report WCAP-16038-P, Revision 0, *Structural Integrity Evaluation of Reactor Vessel Upper Head Penetrations to Support Continued Operation: St. Lucie Unit 2*. Enclosure 1 also includes Westinghouse authorization letter, CAW-03-1617, and the accompanying affidavit, Proprietary Information Notice, and Copyright Notice.

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As Enclosure 1 contains information proprietary to Westinghouse Electric Company, it is supported by an affidavit signed by Westinghouse, the owner of the information. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b) (4) of Section 2.790 of the Commissions' regulations.

Accordingly, it is respectfully requested that the information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR Section 2.790 of the Commission's regulations.

In addition, Enclosure 2 provides 2 copies (1 bound and 1 unbound) of the nonproprietary version of Westinghouse Report WCAP-16038-NP, Revision 0, *Structural Integrity Evaluation of Reactor Vessel Upper Head Penetrations to Support Continued Operation: St. Lucie Unit 2*.

FPL requests approval of the subject relaxation requests by April 25, 2003, the start of the RPV head inspections. Correspondence with respect to the copyright or propriety aspects of Westinghouse Report WCAP-16038-P, Revision 0, *Structural Integrity Evaluation of Reactor Vessel Upper Head Penetrations to Support Continued Operation: St. Lucie Unit 2*, or the supporting Westinghouse affidavit should reference CAW-03-1617 and should be addressed to H. A. Sepp, Manager of Regulatory and Licensing Engineering, Westinghouse Electric Company, P. O. Box 355, Pittsburgh, Pennsylvania 15230-0355. For all other questions about these relaxation requests, please contact George Madden at (772) 467-7155.

Very truly yours,

William Jefferson, Jr.
Vice President
St. Lucie Plant

Attachment
Enclosures

WJ/GRM

St. Lucie Unit 2

NRC Request for Additional Information Response

Relaxation Request No. 2

St. Lucie Unit 2 Relaxation Request Number 1 and 2 From US NRC Order EA-03-009 Response to Request for Additional Information

On March 28, 2003, Florida Power and Light Company (FPL) submitted requests for relaxation[1] from NRC Order EA-03-009[2] for St. Lucie Unit 2. During a meeting with the NRC staff[3] to discuss the relaxation requests, the NRC requested clarification on the access for performing the visual inspection of the reactor vessel head surface near the outer most penetrations and reference material. The response follows.

NRC Question 1: *Relaxation Request #2 is based on the inaccessibility of some areas of the reactor pressure vessel head surface. Drawings presented to the U.S. Nuclear Regulatory Commission staff are not clear as to the accessibility between the ICI nozzles and the shroud ring/insulation panels. Describe the accessibility to this area to allow a 100 percent inspection of the nozzle-to-top-of-head interface region and to provide assurance that no corrosive product has entered the shroud ring-to-vessel interface area.*

FPL Response to NRC Question 1: A review of the applicable insulation and head configuration drawings was performed. These drawings indicate a nominal distance of 4 inches exists between the outer most penetrations (ICI) and the interior surface of the vertical insulation panels at the shroud ring, which will provide adequate space to allow a 100 percent inspection of the nozzle-to-top-of-head interface region and to determine if corrosive product has entered the shroud ring-to-vessel interface area. Additionally, a review of the bare metal visual video recordings from the previous 2001 refueling outage (SL2-13), confirms that there is adequate space between outer most penetrations and the vertical insulation panels to allow a 100 percent inspection of the nozzle-to-top-of-head interface region and to determine if corrosive products have entered the shroud ring-to-vessel interface area.

NRC Question 2: *Provide a copy of the referenced topical report WCAP-16038-P.*

FPL Response to NRC Question 2: The proprietary and non-proprietary versions of WCAP-16038-P[4] are in Enclosures 1 and 2, respectively of L-2003-101.

[1] FPL letter L-2003-086, "St. Lucie Unit 2, Docket No. 50-389, Order (EA-03-009) Relaxation Requests 1 and 2, Examination Coverage of Reactor Pressure Vessel Head Penetration Nozzles– Supplemental Data," D. E. Jernigan to NRC, March 28, 2003.

[2] US NRC Letter EA-03-009, "Issuance of Order Establishing Interim Inspection Requirements for Reactor Pressure Vessel Heads at Pressurized Water Reactors," from Samuel J. Collins (NRC) to All Pressurized Water Reactor Licensees, dated February 11, 2003.

[3] US NRC Memo (ADAMS Accession No. ML030930673), "Forthcoming Meeting With Florida Power and Light Company (FPL) to Discuss Requests for Relaxation From Reactor Pressure Vessel Head Inspection Order at the St. Lucie Plant, Unit No. 2, Monday, April 14, 2003," B.T. Moroney to A.G. Howe, April 3, 2003.

[4] "Structural Integrity Evaluation of Reactor Vessel Upper Head Penetrations to Support Continued Operations: St. Lucie Unit 2," Westinghouse Electric Company LLC WCAP 16038-P, Rev. 0, March 2003.