



August 11, 2003

L-2003-211  
10 CFR 50.4

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  
Control Room Habitability  
Generic Letter 2003-01 60-Day Response

This letter provides the Florida Power and Light Company (FPL) 60-day response to Generic Letter (GL) 2003-01, *Control Room Habitability*, for St. Lucie Units 1 and 2. Recent industry experience has demonstrated that measured in-leakage testing using the American Society of Testing and Materials (ASTM) Standard E741 methodology typically results in greater in-leakage than that assumed in the current license bases. St. Lucie Plant is conservatively assuming that tracer gas testing, planned for September 2003, will demonstrate that current design basis in-leakage assumptions may not be met. Thus, St. Lucie may be unable to provide the information requested in Item 1 of GL 2003-01 by the required December 9, 2003 180-day GL response date. In addition, St. Lucie Plant plans to submit proposed license amendments to the NRC to adopt the 10 CFR 50.67 alternate source term (AST) methodology for assessing the radiological consequences of design basis events. The approval and implementation of the planned license amendment applications are not expected to meet the required GL 2003-01 response date.

St. Lucie is currently performing maintenance activities to address control room envelope (CRE) potential deficiencies. The activities of sealing and coating, repair and/or replacement of the control room boundary doors, balancing airflow in the adjacent and surrounding ventilation systems of the CRE, and other maintenance are scheduled for completion prior to leak testing. CRE leak testing is scheduled for September 2003 using the methods of ASTM E741, *Standard Test Method for Determining Air Change in a Single Zone by Means of a Tracer Gas Dilution*. Test results will be evaluated and any deficiencies will be addressed under the FPL corrective action program.

Implementation of the revised accident source term at St. Lucie will use the methods prescribed in Regulatory Guide 1.183, *Alternate Radiological Source Terms for Evaluating Design Basis Accidents at Nuclear Power Reactors*. 10 CFR 50.67, *Accident Source Term*, requires that a revision of the design bases accident source term be approved by a license amendment under 10 CFR 50.90. The proposed license

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amendments for St. Lucie Units 1 and 2 using an alternate radiological source term are scheduled for submittal in fourth quarter 2003.

Upon approval of the proposed license amendments, FPL will complete its response to Item 1 of GL 2003-01. FPL will keep the NRC Project Manager for St. Lucie advised of schedule progress. If you have any questions on FPL's proposed alternative actions, please contact George Madden at (772) 467-7155.

Very truly yours,



William Jefferson, Jr.  
Vice President  
St. Lucie Plant

WJ/GRM