

February 25, 2004

Mr. J. A. Stall
Senior Vice President, Nuclear and
Chief Nuclear Officer
Florida Power and Light Company
P.O. Box 14000
Juno Beach, Florida 33408-0420

SUBJECT: SAINT LUCIE NUCLEAR PLANT, UNIT 2 - RELIEF REQUEST NO. 1
REGARDING USE OF SUBSEQUENT ASME CODE EDITION
(TAC NO. MC0937)

Dear Mr. Stall:

By a letter dated August 6, 2003, Florida Power and Light Company (FPL) submitted the Third 10-Year Inspection Interval Inservice Inspection Program for St. Lucie Unit 2. Included in the submittal was Relief Request (RR) No. 1 requesting approval to use the 1998 Edition of the American Society of Mechanical Engineers (ASME) Code, Section XI with Addenda through 2000, in lieu of using the 1995 Edition of ASME Section XI with Addenda through 1996. Use of a subsequent edition of the code requires approval of the U.S. Nuclear Regulatory Commission (NRC) pursuant to Title 10 of the *Code Federal Regulations* (10 CFR) Section 50.55a(g)(4)(iv).

The NRC staff discussed the proposed alternative with members of your staff in a conference call on December 10, 2003, and requested that RR No. 1 be modified to include the following limitations on the use of the 2000 Addenda:

- (1) Paragraph IWA-4340 regarding mitigation of defects by "modification" will not be used
- (2) The repair and replacement activity provisions in IWA-4540(c) of the 1998 Edition of Section XI for pressure testing Class 1, 2, and 3 mechanical joints will be applied when using the 1998 Edition through the 2000 addenda of Section XI.

In a subsequent conversation, Mr. George Madden of your staff requested a letter identifying the limitations previously discussed. This letter provides the information. A detailed discussion of the bases for the NRC staff's request may be found in the January 7, 2004, *Federal Register* notice regarding proposed amendments to 10 CFR 50.55a (69 FR 879).

Please respond by submitting a modified request, or by indicating your reasons for not wanting to commit to the above conditions. If you have any questions regarding this issue, please feel free to contact me at (301) 415-3974.

Sincerely,

/RA/

Brendan T. Moroney, Project Manager, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-389

cc: See next page

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ST. LUCIE PLANT

cc:

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