



**FPL**

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

March 23, 2004

L-2004-064  
10 CFR 50.4  
10 CFR 50.55a

US Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

Re: St. Lucie Unit 2  
Docket No. 50-389  
Inservice Inspection Plan  
Third 10-Year Interval  
Relief Request 1 – Supplement 1

By letter L-2003-189 dated August 6, 2003, Florida Power & Light Company (FPL) submitted the Third 10-year Inservice Inspection (ISI) Program for St. Lucie Unit 2. Included with the submittal was Relief Request (RR) 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 NRC pursuant to 10 CFR 50.55a(g)(4)(iv).

The NRC staff discussed the proposed alternative with FPL in a conference call on December 10, 2003 and requested that RR 1 be modified to include the following limitations on the use of the 2000 Addenda:

- Paragraph IWA-4340 regarding mitigation of defects by modification will not be used.
- The repair and replacement activity provision of 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.

On February 25, 2004, the NRC issued a letter requesting FPL to modify RR 1 to commit to the above conditions. The revised RR 1 is attached and includes the specified NRC commitment.

Please contact us if there are any questions about this submittal.

Very truly yours

William Jefferson, Jr.  
Vice President  
St. Lucie Plant

WJ/GRM

Attachment

A047

**St. Lucie Unit 2  
Third Inspection Interval  
Relief Request Number 1 Revision 1**

Proposed Use of Subsequent ASME Code Edition and Addenda  
In Accordance with 10 CFR 50.55a(g)(4)(iv) for Inservice Inspection Items

**1. ASME Code Component(s) Affected**

FPL is requesting that the 1998 Edition of ASME Section XI with Addenda through 2000, as modified by 10CFR50.55a, be used in lieu of using the 1995 Edition of ASME Section XI with Addenda through 1996 for the St. Lucie Unit 2 third 10-year inservice inspection interval beginning August 8, 2003.

**2. Applicable Code Edition and Addenda**

10CFR50.55a, paragraph (g)(4)(ii) in effect on August 8, 2003 stated:

“Inservice examination of components and system pressure tests conducted during successive 120-month inspection intervals must comply with the requirements of the latest edition and addenda of the Code incorporated by reference in paragraph (b) of this section 12 months prior to the start of the 120-month inspection interval, subject to the limitations and modifications listed in paragraph (b) of this section.”

The date of 12 months prior to the start of the third 10-year interval was August 8, 2002. At that time, 10CFR50.55a(b)(2) endorsed the 1995 Edition with Addenda through 1996. The revised 10CFR50.55a(b)(2) that endorsed the 1998 Edition with 2000 Addenda was not effective until October 28, 2002.

**3. Proposed Subsequent Code Edition and Addenda**

FPL is requesting that the 1998 Edition of ASME Section XI with Addenda through 2000 as modified by 10CFR50.55a, effective date October 28, 2002, be used in lieu of using the 1995 Edition of ASME Section XI with Addenda through 1996.

**4. Related Requirements**

FPL will implement the requirements of the 1998 Edition with Addenda through 2000 of ASME Section XI, as modified by 10CFR50.55a, effective date October 28, 2002 with the following additional modifications:

1. Paragraph IWA-4340 of the 2000 Addenda 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.

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**5. Duration of Proposed Request**

The update to the 1998 Edition with Addenda through 2000 of ASME Section XI will be effective for the St. Lucie Unit 2 third 10-year inspection interval. |