

April 8, 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: ST. LUCIE NUCLEAR PLANT, UNIT 1 - FIRST REVISED ORDER EA-03-009
RELAXATION REQUESTS - REQUEST FOR ADDITIONAL INFORMATION
(TAC NOS. MBC1394 AND MC1395)

Dear Mr. Stall:

By letter dated November 21, 2003, Florida Power and Light Company (FPL) submitted two requests for relaxation from the ultrasonic testing and bare metal visual inspection requirements of the U.S. Nuclear Regulatory Commission (NRC) Order EA-03-009 for St. Lucie Unit 1.

On February 20, 2004, the NRC issued the First Revised Order EA-03-009, which revised requirements for bare metal visual inspections and penetration nozzle nonvisual inspections. By letter dated March 23, 2004, FPL confirmed its continued need for relaxation from inspection requirements in the First Revised Order.

In telephone conference calls on April 2, 2004, and April 4, 2004, FPL and the NRC staff discussed the relaxation requests under review and the results of the inspections. Based on these discussions, FPL made a revised submittal in a letter dated April 6, 2004, which withdrew Relaxation Request No.1 and revised Relaxation Request No. 2.

The NRC staff has reviewed your submittal and finds that a response to the enclosed request for additional information (RAI) is needed before we can complete the review. This request was discussed with your staff on April 7, 2004.

If you have any questions, 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. 50-335

Enclosure: RAI

cc w/encl: See next page

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NAME	BMoroney	BClayton	TChan	WBurton
DATE	04/07/04	04/08/04	email 4/7/04	04/08/04

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REQUEST FOR ADDITIONAL INFORMATION

ORDER EA-03-009 RELAXATION REQUEST NOS. 1 AND 2

SAINT LUCIE PLANT, UNIT 1

DOCKET NO. 50-335

1. The April 6, 2004, submittal withdrew Relaxation Request No. 1 regarding bare metal visual (BMV) inspections. The previous submittals provided detailed information regarding the inability to obtain 360 degree coverage around nozzle #2. Please explain what was done to remove or bypass the obstruction so that BMV Relaxation is no longer necessary.
2. Please explain the limitation in obtaining a 12 degree arc (no scan) for penetration #6 when you achieved 360 degree UT coverage greater than 2 inches above the weld for all other 11 degree nozzle angles
3. With respect to question #2, please explain why the scan limitation for a specific nozzle angle may be different among penetrations that have the same nozzle angle. For example, penetration #12 had an arc of 47 degrees missed while penetrations 10 and 13 achieved 360 degree coverage. All three penetrations are listed as having a 22.4 degree nozzle angle.
4. With respect to the 17 penetrations where ultrasonic testing (UT) coverage was less than 2.0 inches above the weld on the uphill side, were there any instances where that same arc of unexamined area extended to the downhill side of the weld? If so, what were the hoop stress levels in the unexamined areas?
5. Please explain the process used to obtain 100 percent UT coverage down to the bottom of the nozzle and why relaxation is no longer necessary.
6. In your earlier submittal and during the April 2, 2004, telephone call, you indicated that stress levels were less than 20 ksi at scan distances exceeding 0.75 inch above the weld as part of the technical basis for the relaxation request. Your April 6, 2004, submittal extends this length to 1.11 inches. Please discuss the basis for the difference and why the new number (scan distance) is truly representative and conservative.

ENCLOSURE

Mr. J. A. Stall
Florida Power and Light Company

ST. LUCIE PLANT

cc:
Senior Resident Inspector
St. Lucie Plant
U.S. Nuclear Regulatory Commission
P.O. Box 6090
Jensen Beach, Florida 34957

Mr. G. L. Johnston
Plant General Manager
St. Lucie Nuclear Plant
6351 South Ocean Drive
Jensen Beach, Florida 34957

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

Mr. Terry Patterson
Licensing Manager
St. Lucie Nuclear Plant
6351 South Ocean Drive
Jensen Beach, Florida 34957

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

David Moore, Vice President
Nuclear Operations Support
Florida Power and Light Company
P.O. Box 14000
Juno Beach, FL 33408-0420

Marjan Mashhadi, Senior Attorney
Florida Power & Light Company
801 Pennsylvania Avenue, NW
Suite 220
Washington, DC 20004

Mr. Rajiv S. Kundalkar
Vice President - Nuclear Engineering
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. J. Kammel
Radiological Emergency
Planning Administrator
Department of Public Safety
6000 SE. Tower Drive
Stuart, Florida 34997

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

Mr. William Jefferson, Jr.
Site Vice President
St. Lucie Nuclear Plant
6351 South Ocean Drive
Jensen Beach, Florida 34957-2000