



April 13, 2004

L-2004-094
EA-03-009(IV)(F)(2)

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

Re: St. Lucie Unit 1
Docket No. 50-335
Order (EA-03-009) Relaxation Request 2
Examination Coverage of Reactor Pressure
Vessel Head Penetration Nozzles – Supplement 4

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 February 20, 2004, the NRC issued First Revised Order EA-03-009. By letter L-2003-283 dated November 21, 2003, and pursuant to the procedure specified in Section IV, paragraph F of the Order, Florida Power & Light Company (FPL) requested relaxation from certain requirements specified in Section IV, paragraph C (1) for St. Lucie Unit 1. The FPL relaxation requests were supplemented by FPL letters L-2004-071, L-2004-085, and L-2004-088 dated March 23, 2004, April 6, 2004 and April 8, 2004, respectively. The supplements were the result of conference calls on March 4, 2004, April 2, 2004, and April 4, 2004 and an NRC request for additional information (RAI) dated April 8, 2004.

On April 12, 2004, the NRC requested FPL to confirm in writing the acceptability of certain conditions to be imposed by the NRC safety evaluation. In support of the approval of Relaxation Request No. 2, FPL concurs with the following condition.

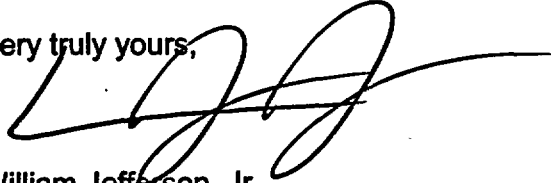
If the NRC staff finds that the crack-growth formula in industry report MRP-55 is unacceptable, the licensee shall revise its analysis that justifies relaxation of the First Revised Order dated February 20, 2004, within 30 days after the NRC informs the licensee of an NRC-approved crack growth formula. If the licensee's revised analysis shows that the crack growth acceptance criteria are exceeded prior to the end of the current operating cycle, this relaxation is rescinded and the licensee shall, within 72 hours, submit to the NRC written justification for continued operation. If the revised analysis shows that the crack growth acceptance criteria are exceeded during the subsequent operating cycle, the licensee shall, within 30 days, submit the revised analysis for NRC review. If the revised analysis shows that the crack growth acceptance criteria are not exceeded during either the current operating cycle or the subsequent operating cycle, the licensee shall, within 30 days, submit a letter to the NRC confirming that its analysis has been revised. Any future crack-growth analyses performed for this and future cycles for RPV head penetrations must be based on an acceptable crack growth rate formula.

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For any additional questions about this relaxation request, please contact George Madden at (772) 467-7155.

Very truly yours,

A handwritten signature in black ink, appearing to read 'WJ', with a long horizontal line extending to the right.

William Jefferson, Jr.
Vice President
St. Lucie Plant

WJ/GRM