



April 20, 2004

L-2004-100  
10 CFR 50.4  
10 CFR 50.55a

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  
Inservice Inspection Plans  
Third 10-Year Intervals  
Supplement 1 - Repair of Alloy 600 Small  
Bore Nozzles Without Flaw Removal  
Unit 1 Relief Request 23 Revision 1 and Unit 2 Relief Request 5 Revision 0

By letter L-2003-285 dated November 21, 2003 as supplemented by FPL letter L-2004-065 on March 24, 2004 and the NRC review status of WCAP-15973-P, Florida Power & Light Company (FPL) requested extension of Unit 1 Relief Request (RR) 23 and Unit 2 RR 5 (formerly Unit 2 second ISI interval RR 33). Unit 1 RR 23 and Unit 2 second interval RR 33 were previously submitted by FPL letter L-2002-247 on January 8, 2003, supplemented by FPL letter L-2003-108 on April 23, 2003. NRC approved the RRs for one operating cycle for each unit by NRC letters dated May 9, 2003 and May 23, 2003. On August 8, 2003, Unit 2 started its third 10-year inspection interval. In response the NRC project manager's March 11, 2004 request, FPL identified the reactor coolant system (RCS) hot leg nozzle replacements in refueling outages SL1-17 and SL2-14.

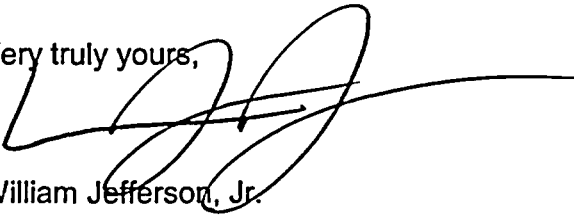
The NRC staff stated in their May 9, 2003 and May 23, 2003 letters that prior to use of the half nozzle and sleeved full-nozzle replacements on a permanent basis, FPL will be required to submit a separate relief request for NRC approval. The NRC planned to issue the required conditions for implementing the half nozzle and sleeved full-nozzle repairs on a permanent basis in the NRC staff's safety evaluation of the Westinghouse Topical Report WCAP-15973-P, Revision 00, that was under NRC staff review. The extension of the Unit 1 RR 23 and Unit 2 RR 5 for one additional cycle for each unit allows time for the NRC staff to complete the topical report review. It will also allow time for FPL to submit and the NRC to review the permanent RRs.

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On April 19, 2004 NRC issued verbal approval of a one cycle extension for the subject relief requests. FPL understands the NRC plans to issue the written approval within 30 days. During the conference call on April 19, 2004, the NRC requested FPL to confirm several facts associated with the review of the RRs. The attachment to this letter provides the requested confirmation of facts.

Please contact George Madden at 772-467-7155 if there are any questions about this submittal.

Very truly yours,

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

William Jefferson, Jr.  
Vice President  
St. Lucie Plant

WJ/GRM

On April 19, 2004 NRC granted verbal approval of a one cycle extension for the subject relief requests. FPL understands the NRC plans to issue the written approval within 30 days. During the conference call on April 19, 2004, the NRC requested FPL to confirm three final facts associated with the review of the RRs.

**NRC Fact 1:**

The inspections on Unit 1 during this outage (SL1-19) found no leakage on RC-126/PDT-1121D or on any other nozzles.

**FPL Response:**

A visual inspection of all the small bore nozzles, for leakage, is made at each outage. No leakage was identified on nozzle RC-126 or any of the other small bore nozzles during the current outage (SL1-19) inspections.

**NRC Fact 2:**

Clarify that RC-126 and PDT-1121D (piping nomenclature vs. instrument name) refer to the same nozzle, which was repaired/replaced in 2001 refueling outage (SL1-17).

**FPL Response:**

PDT-1121D is attached to nozzle RC-126.

**NRC Fact 3:**

First paragraph on page 4 of attachment to letter L-2003-285 needs to be clarified to indicate the most limiting/conservative condition from the enclosed report.

**FPL Response:**

For the pressurizer nozzles, the maximum combined usage factors (CUF) are 0.742 at the inside surface of the Unit 1 pressurizer lower level nozzle and 0.454 at the outside surface of the Unit 1 upper level and pressure tap nozzle. The maximum CUFs for the piping nozzles are 0.124 at the outside surface and 0.069 at the inside surface of the measurement and sampling nozzles.