



August 23, 2004

L-2004-185
10 CFR 50.90

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
Proposed License Amendments
Supplement 2 - Request for Additional Information Response
Elimination of RPS, AFAS and ESFAS
Pressure Sensor Response Time Testing Requirements

By letter L-2003-265 dated November 21, 2003 and pursuant to 10 CFR 50.90, Florida Power & Light Company (FPL) requested to amend Facility Operating Licenses DPR-67 and NPF-16 for St. Lucie Units 1 and 2. The submittal was supplemented based upon an NRC request for additional Information (RAI) by FPL letter L-2004-091 dated May 18, 2004. The proposed changes revise the St. Lucie Units 1 and 2 Technical Specification (TS) Definitions 1.12, Engineered Safety Features (ESF) Response Time, and 1.26, Reactor Protection System (RPS) Response Time.

The data provided by FPL letter L-2004-091 for PDT-1111A and PDT-1121A has been updated based on the response time tests performed during the spring 2004 Unit 1 refueling outage (SL1-19). This provides the latest response time test data for transmitters with variable damping and used a method consistent with the data for the other transmitters. See the attached updated table for the data.

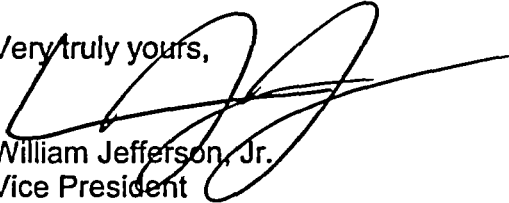
The original No Significant Hazards evaluation remains valid and bounds the proposed change. In accordance with 10 CFR 50.91 (b)(1), a copy of this letter is being forwarded to the State Designee for the State of Florida.

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Approval of the proposed license amendments is requested by October 2004 to support the fall 2004 St. Lucie Unit 2 refueling outage (SL2-15). Please issue the amendments to be effective on the date of issuance and to be implemented within 60 days of receipt by FPL. Please contact George Madden at 772-467-7155 if there are any questions about this submittal.

Very truly yours,



William Jefferson, Jr.
Vice President
St. Lucie Plant

WJ/GRM

Attachment

cc: Mr. William A. Passetti, Florida Department of Health

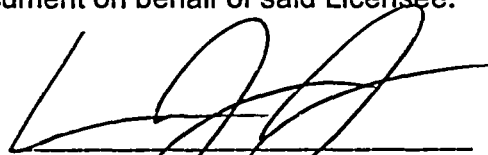
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STATE OF FLORIDA)
)
COUNTY OF ST. LUCIE) ss.

William Jefferson, Jr. being first duly sworn, deposes and says:

That he is Vice President, St. Lucie Plant, for the Nuclear Division of Florida Power & Light Company, the Licensee herein;

That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information, and belief, and that he is authorized to execute the document on behalf of said Licensee.

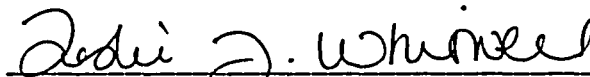


William Jefferson, Jr.

STATE OF FLORIDA
COUNTY OF ST LUCIE

Sworn to and subscribed before me

this 23 day of August 2004
by William Jefferson, Jr., who is personally known to me.



Name of Notary Public - State of Florida



Leslie J. Whitwell
MY COMMISSION # DD020212 EXPIRES
May 12, 2005
BONDED THRU TROY FAIN INSURANCE, INC.

(Print, type or stamp Commissioned Name of Notary Public)

ATTACHMENT

**Updated Test Data
Unit 1 RCS Low Flow Transmitters
With Variable Signal Damping**

By letter L-2004-091 dated May 18, 2004, FPL supplemented the original PLA submittal with transmitter response time data.

The table below has been updated to reflect data from the spring 2004 refueling outage (SL1-19) response time tests on PDT-1111A and PDT-1121A. This provides the latest response time test data for transmitters with variable damping and used a method consistent with the data for the other transmitters.

Latest Response Time Test Data for Unit-1 RCS Low Flow Transmitters

Transmitter Tag Number	Measured Response Time	Test Date	Comments
PDT-1111A	0.66 sec	Mar, 2004	Performed via white noise analysis
PDT-1111B	0.64 sec	Oct, 1999	Performed via white noise analysis
PDT-1111C	0.60 sec	Apr, 2001	Performed via white noise analysis
PDT-1111D	0.64 sec	Oct, 2002	Performed via white noise analysis
PDT-1121A	0.64 sec	Mar, 2004	Performed via white noise analysis
PDT-1121B	0.65 sec	Oct, 1999	Performed via white noise analysis
PDT-1121C	0.61 sec	Apr, 2001	Performed via white noise analysis
PDT-1121D	0.60 sec	Oct, 2002	Performed via white noise analysis