



December 28, 2004

L-2004-293
10 CFR 50.55a

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

RE: St. Lucie Unit 2
Docket No. 50-389
Third 10-Year Inservice Inspection Interval
Relief Request No. 2 Supplemental Information

Florida Power & Light Company (FPL) submitted the Third Interval Inservice Inspection (ISI) Program by FPL letter L-2003-189 dated August 6, 2003. Included in the submittal was ISI Relief Request No. 2 regarding the risk-informed inservice inspection program (RI-ISI) for ASME Class 1 piping. On August 6, 2004, the NRC issued a request for additional information (RAI). FPL responded to the RAI by FPL letter L-2004-210 dated September 17, 2004.

The attachment to this letter provides a revised copy of Table 5-1 in the relief request. The updated table was requested by the NRC in a conference call on October 26, 2004.

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

Very truly yours,


William Jefferson, Jr. *W. Jefferson, Jr.*
Vice President
St. Lucie Plant

WJ/GRM

A047

**UPDATED Table 5-1
STRUCTURAL ELEMENT SELECTION
RESULTS AND COMPARISON TO ASME SECTION XI
1998 A2000 REQUIREMENTS**

System	Number of High Safety Significant Segments (No. of HSS in Aug. Program / Total No. of Segments in Aug. Program)	Degradation Mechanism(s)	Class	ASME Code Category (Note 2)	Weld Count		ASME XI Examination Methods (Volumetric (Vol) and Surface (Sur))		RI-ISI (Note 1)	
					Butt	Socket	Vol & Sur	Sur Only	SES Matrix Region	Number of Exam Locations
CH	0	Thermal Fatigue	1	B-F	0	0	0	0	-	0
				B-J	21	99	0	61		
RC	11 (0/0)	Thermal Fatigue, Thermal Transients, Vibration Fatigue	1	B-F	6	0	3	3	1, 2	0 volumetric
				B-J	241	45	66	53		24 volumetric
SI	0	Thermal Fatigue, Thermal Transients	1	B-F	0	0	0	0	-	0
				B-J	139	12	13	4		
TOTAL	11 (0/0)		CL. 1	B-F	6	0	3	3		0 NDE
				B-J	401	156	79	118		24 NDE
			TOTAL		407	156	82	121		24 NDE

Summary: Current ASME Section XI selects a total of 82 non-destructive exams (surface only exams not included), while the proposed RI-ISI program selects a total of 24 non-destructive exams. This results in a 71% reduction of non-destructive exams.

General Notes:

1-System pressure test requirements and VT-2 visual examinations shall continue to be performed in ASME Class 1 systems.

2-1998 A2000, Table IWB-2500-1, Category B-J, now includes piping dissimilar metal piping welds. These welds were considered Category B-F, item #'s 5.130 and 5.140 under 1989 ASME Section XI Table IWB-2500-1 (used for the previously approved submittal).

Explanation of Changes in Table 5-1

Total Weld Count:

Second interval table showed 404 butt welds, 157 socket welds.
Updated Table 5-1 shows 407 butt welds, 156 socket welds.

One butt weld previously counted as socket weld is now counted correctly, one new butt weld was installed by a plant modification, and one butt weld was miscounted and previously not included.

Increase in welds identified as reactor coolant (RC) system welds:

Second Interval Table 5-1 showed 222 RC system butt welds (B-F & B-J), 20 socket welds.
Updated Table 5-1 shows 241 RC system butt welds, 45 RC system socket welds.

Charging and letdown (CH) system welds located in transition segments 2-RC-074, 2-RC-075, 2-RC-079, and 2-RC-080 were previously counted as CH welds. RC system weld count has increased and CH system weld count has decreased to reflect segment assignment. This is administrative only and does not affect the number of RC or CH segments.

Shutdown cooling suction and loop injection welds located in transition segments 2-RC-056, 2-RC-057, 2-RC-058, 2-RC-059, 2-RC-067, and 2-RC-069 were previously counted as safety injection (SI) welds. RC system weld count has increased and SI system weld count has decreased to reflect segment assignment. This is administrative only and does not affect the number of RC or SI segments.

There has been no change to the risk-informed inservice inspection (RI-ISI) analysis due to the redistribution of system weld counts.