



December 27, 2004

L-2004-281
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
In Service Test Program
Requests Approval to Use of Subsequent OM Code for
Manual and Primary Containment Vacuum Relief Valves

Pursuant to 10 CFR 50.55a(f)(4)(iv), Florida Power & Light Company (FPL) requests approval to use a subsequent OM Code for manual and primary containment vacuum relief valves. The OM Code, 1995 Edition through 2000 Addenda is authorized under the 2004 Edition of paragraph (b) of Section 50.55a. Paragraphs ISTC-3540 and I-1380 are to be adopted in their entirety and contain all applicable requirements related to the frequency of testing manual and primary containment vacuum relief valves.

The regulations in 10 CFR 50.55a(f)(4) establish the effective ASME Code edition and addenda to be used by licensees for performing inservice testing of pumps and valves. Paragraph 50.55a(f)(4)(iv) states that inservice testing of pumps and valves may meet the requirements set forth in subsequent editions and addenda that are incorporated by reference in paragraph (b) of Section 50.55a, subject to the limitations and modifications listed in paragraph (b) of this section, and subject to Commission approval. In addition, it allows the use of portions of editions or addenda provided that all related requirements of the respective editions or addenda are met.

The current St. Lucie Units 1 and 2, 120-month (10-year), In Service Test (IST) interval is based on the requirements of the ASME Boiler and Pressure Vessel Code, Section XI, 1989 Edition and ASME OM-Code, including OMA-88 Addenda, Operation and Maintenance of Nuclear Power Plants. This request to adopt paragraphs ISTC-3540, Manual Valves, and I-1380, Test Frequency for Class 2 and 3 Primary Containment Vacuum Relief Valves, of ASME Code for Operation and Maintenance of Nuclear Power Plants (OM Code), 1995 Edition through 2000 Addenda, complies with the requirements stated above.

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

Very truly yours,


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

WJ/GRM

Attachment

St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
L-2004-281 Attachment

**Request in Accordance with 10 CFR 5055a(f)(4)(iv) for Use of
Subsequent OM Code for Manual and Primary Containment
Vacuum Relief Valves**

1. ASME Code Components Affected

All manual valves and primary containment vacuum relief valves in St. Lucie Units 1 and 2 IST Program.

2. Applicable Code Edition and Addenda

ASME Boiler and Pressure Vessel Code, Section XI, 1989 Edition and ASME/ANSI OM-Code, including OMA-88 Addenda, Operation and Maintenance of Nuclear Power Plants.

3. Proposed Portions of Subsequent Code Edition and Addenda

ASME Code for Operation and Maintenance of Nuclear Power Plants, 1998 Edition through 2000 Addenda, paragraphs ISTC-3540, Manual Valves, and I-1380, Test Frequency, Class 2 and 3 Primary Containment Vacuum Relief Valves.

4. Related Requirements

Paragraph ISTC-3540 is subject to the limitations imposed by 10 CFR 50.55a(b)(3)(vi), exercise interval for manual valves.

5. Duration of Proposed Request

Through the end of the current 120-month (10-year) interval ending February 10, 2008.