



August 11, 2005

L-2005-170
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 – Withdrawal
Alternate Source Term and Conforming Amendments

By Letters L-2003-224 and L-2003-220 dated September 18, 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 proposed amendments revised the St. Lucie Unit 1 and Unit 2 licensing bases to adopt the alternate source term (AST) as allowed in 10 CFR 50.67. The applications also included conforming amendments to the Unit 1 and Unit 2 Technical Specification Sections 1.10, 3.4.6.2, 4.7.8, and 6.8.4.h. By Letter L-2004-203 dated September 21, 2004, FPL supplemented the amendment applications in response a teleconference on June 28, 2004, a NRC request for additional information dated July 9, 2004, and an email dated August 2, 2004. Furthermore, in support of the Amendment 138 review, NRC requested additional information by email on January 5, 2005 and FPL provided the information via L-2005-004 on January 7, 2005. Based on emergent issues, FPL and the NRC discussed open items and the current status of the AST review on June 14, 2005.

Based on the discussion with NRC staff on June 14, 2005, FPL hereby withdraws the subject license amendment requests for use of the alternative source term methodology for radiological consequence analyses of accident scenarios. For St. Lucie Unit 2, partial approval of this amendment for steam generator tube rupture (SGTR) event was included in the 30% steam generator tube plugging License Amendment 138. The withdrawal of remainder of this AST license amendment for St. Lucie Unit 2 along with the complete withdrawal for St. Lucie Unit 1 has been discussed with the NRC staff following the June 14, 2005 meeting. FPL is withdrawing this application based on the competing priorities requiring the same resources for both FPL and the NRC to resolve the remaining issues with regards to the review of these license amendments. These resources are required to pursue a higher priority amendment for increased tube plugging on the St. Lucie Unit 2 steam generators. The St. Lucie Unit 2 amendment for increased tube plugging is required for the spring 2006 outage (SL2-16). Continued efforts for the AST amendment at this time could jeopardize the schedule for the proposed St. Lucie Unit 2 increased steam generator tube plugging amendment.

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FPL still intends to convert the radiological analysis to AST methodology for both St. Lucie Unit 1 and Unit 2 and will resubmit these license amendment requests on a schedule to be determined later. Based on discussion with the staff, FPL believes that the primary remaining issues are the treatment of the release of iodine from back leakage into the refueling water tank (RWT) and the acceptance criteria for the waste gas decay tank rupture event. FPL anticipates the NRC closure letter will confirm the open issues. Several other issues raised by the staff have been resolved although the revised analysis may not have been submitted and reviewed.

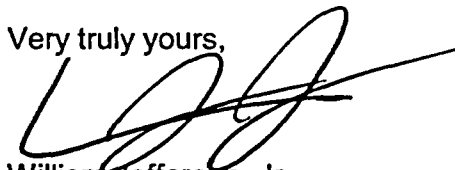
This license amendment request was referenced in the response to Generic Letter 2003-01. Since FPL intends to resubmit this request there is no change to the intent of the FPL response to Generic Letter 2003-01 in that the final resolution will be a license amendment to increase the allowable in-leakage to the respective control rooms.

The staff was made aware that the subject license amendment request was also part of a resolution of a Generic Letter 91-18 issue since the measured in-leakage to each control room was larger than the current licensing basis. Each unit is currently operating with an operability assessment concerning the ability of the control room dose to be maintained less than GDC 19 limits. These operability assessments are independent of alternative source term methodology and a review determined that they continue to be valid.

In accordance with 10 CFR 50.91 (b)(1), a copy of the proposed amendment is being forwarded to the State Designee for the State of Florida.

Please contact George Madden at 561-467-7155 if there are any further questions about this licensing action.

Very truly yours,



William Jefferson, Jr.
Vice President
St. Lucie Plant

WJ/GRM

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