



November 9, 2005

L-2005-202
10 CFR 50.90

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

RE: St. Lucie Unit 2
Docket No. 50-389
Proposed License Amendment Supplement
Containment Leakage Rate Program
One-Time Type A Test Interval Extension

By Florida Power & Light Company (FPL) letter L-2005-029 dated March 31, 2005 and pursuant to 10 CFR 50.90, FPL requested to amend Facility Operating License NPF-16 for St. Lucie Unit 2. The proposed amendment requested changes to the Administrative Technical Specification (TS) Section 6.8.4.h, Containment Leakage Rate Testing Program, to revise an exception to the commitment to follow the guidelines of Regulatory Guide (RG) 1.163, *Performance-Based Containment Leak-Test Program*. This exception is based on information in the proposal for the 15-year Type A integrated leak rate test (ILRT) surveillance interval and NEI 94-01, Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J. The effect will be a one-time extension from the currently approved 15-year interval since the last Type A test to approximately a 15.5_year interval since the last Type A test. The last St. Lucie Unit 2 Type A test was performed in June 1992. The next ILRT will be required to be performed prior to start-up from the fall 2007 refueling outage (SL2-17). The current TS requires the ILRT to be performed no later than June 2007, which is four months before the start of SL2-17, the reactor vessel head and steam generator replacement outage.

After a phone call with the NRC staff on August 3, 2005, the NRC Project Manager for St. Lucie requested FPL to submit a clarification of the differences between the values for large early release fraction (LERF), population dose, and the conditional containment failure probability (CCFP) in the previously approved Unit 2 Amendment 130 submittals, L-2002-143 and L-2002-239, and the FPL March 31, 2005 submittal, currently under review by the NRC staff, L-2005-029.

The proposed license amendment for a one-time 15-year integrated leak rate test (ILRT) surveillance interval for St. Lucie was submitted by FPL letter L-2002-143 as supplemented by FPL letter L-2002-239. TS Amendment 130 was subsequently issued April 10, 2003. In 2004, St. Lucie Unit 2 probabilistic safety assessment (PSA) Level 1 and Level 2 model updates were performed to incorporate peer review comments and other feedback on the

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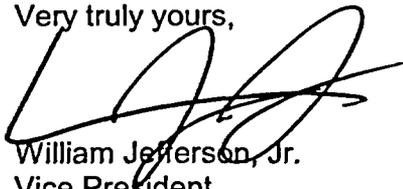
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applications. The proposed license amendment (PLA) submitted by FPL letter L-2005-029 dated March 31, 2005 for extension of the ILRT surveillance interval to 16 years used the same methodology as the previously approved for Amendment 130. However, the proposed amendment for the 16-year ILRT interval submitted by FPL letter L-2005-029 incorporated the Unit 2 PSA model updates.

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

Please contact us if there are any additional questions about this submittal.

Very truly yours,

A handwritten signature in black ink, appearing to read 'WJ', is written over the typed name of William Jefferson, Jr.

William Jefferson, Jr.
Vice President
St. Lucie Plant

WJ/GRM

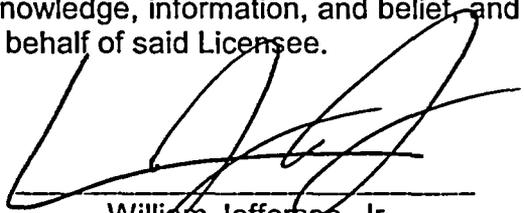
cc: Mr. William A. Passetti, Florida Department of Health

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.

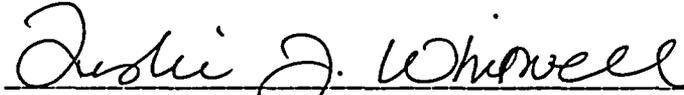


William Jefferson, Jr.

STATE OF FLORIDA
COUNTY OF ST LUCIE

Sworn to and subscribed before me

this 9 day of Nov., 2005
by William Jefferson, Jr., who is personally known to me.



Name of Notary Public - State of Florida



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