

June 9, 2006

Mr. J. A. Stall
Senior Vice President, Nuclear and
Chief Nuclear Officer
Florida Power and Light Company
P.O. Box 14000
Juno Beach, Florida 33408-0420

SUBJECT: ST. LUCIE PLANT, UNIT NO. 2 - EVALUATION OF RESPONSE TO GENERIC
LETTER 2004-01 (TAC NO. MC4846)

Dear Mr. Stall:

On August 30, 2004, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2004-01, "Requirements for Steam Generator Tube Inspections." The purpose of GL 2004-01 was to obtain information that would enable the NRC staff to determine whether licensees' steam generator (SG) tube inspection programs comply with the existing tube inspection requirements in the plant Technical Specifications (TSs) in conjunction with Appendix B to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50.

By letter dated October 29, 2004, Florida Power and Light Company, et al. (the licensee), submitted a response to GL 2004-01 for St. Lucie Unit 2. In the response, the licensee indicated that the SG tube inspection practices at St. Lucie 2 were in compliance with the TSs, in conjunction with Criteria IX, XI and XVI of 10 CFR Part 50, Appendix B. However, the licensee also indicated it would submit a license amendment request, consistent with the GL, to ensure that future inspections would remain in compliance. The license amendment request was subsequently submitted on November 8, 2004, and was approved by the NRC staff on April 11, 2006.

As discussed in the enclosed evaluation, the NRC staff concludes that the licensee has adequately addressed the issues identified in GL 2004-01 for St. Lucie Unit 2.

If you have any questions, please call me at (301) 415-3974.

Sincerely,

/RA/

Brendan T. Moroney, Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-389

Enclosure: Evaluation

cc w/encl: See next page

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NRR-106

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EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RESPONSE TO NRC GENERIC LETTER 2004-01

FLORIDA POWER AND LIGHT COMPANY, ET AL.

ST. LUCIE PLANT, UNIT NO. 2

DOCKET NO. 50-389

On August 30, 2004, the Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2004-01, "Requirements for Steam Generator Tube Inspections." The purpose of GL 2004-01 was to obtain information that would enable the NRC staff to determine whether licensees' steam generator (SG) tube inspection programs comply with the existing tube inspection requirements in the plant Technical Specifications (TSs) in conjunction with Appendix B to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50.

Licensees who concluded that their SG tube inspections have not been or are not being performed consistent with the NRC's position on the requirements in the TSs, in conjunction with Appendix B of 10 CFR Part 50, were requested to submit a safety assessment. As part of this safety assessment, licensees were to address whether their safety bases for limiting inspections within the tubesheet constitutes a change to the "method of evaluation" for establishing the structural and leakage integrity of the tube-to-tubesheet joint.

By letter dated October 29, 2004 (Agencywide Documents Access and Management System (ADAMS) Accession Number ML043070353), Florida Power and Light Company, et al. (the licensee), submitted a response to GL 2004-01 for St. Lucie Unit 2. In the response, the licensee indicated that the tube inspection practices at St. Lucie 2 were in compliance with the TSs, in conjunction with Criteria IX, XI and XVI of 10 CFR Part 50, Appendix B.

This statement was based, in part, on a conclusion that there was no potential for degradation to occur below the region within the tubesheet that was inspected with a rotating probe (i.e., the portion of the tube below the top 8 inches of the tubesheet). This conclusion was based on degradation in the tubesheet region being limited to a few tubes with all of the indications located within the top 2 inches of the tubesheet.

Given these inspection findings, the NRC staff could not conclude that the licensee's past inspection practices were consistent with the staff's position outlined in GL 2004-01, since the staff is unaware of any technical justification that would indicate tube degradation within the tubesheet would only occur near the top of the tubesheet. However, in its GL 2004-01 response, the licensee also indicated it would be submitting a license amendment request, consistent with the GL, to ensure that future inspections would remain in compliance with the TSs, in conjunction with 10 CFR Part 50, Appendix B. This decision was based on a preliminary degradation assessment that indicated there was a potential for degradation to occur in the tubesheet region below the region historically inspected with a rotating probe. The potential for degradation to occur deeper in the tubesheet was based on recent inspection results in SGs of similar design.

Enclosure

This license amendment request was subsequently submitted on November 8, 2004, and was approved by the NRC staff on April 11, 2006 (ML060790352). Based on the license amendment, the NRC staff concludes that the licensee's inspection practices at St. Lucie Unit 2 are consistent with the NRC staff's position outlined in GL 2004-01. As a result, the NRC staff concludes that the licensee has adequately addressed the issues identified in GL 2004-01.

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