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St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389

License Renewal Condensate Storage Tank Cross-Connect Buried Piping Inspection (Unit 1 only) Revised Commitment

References:

1. Safety Evaluation Report Related to the License Renewal of St. Lucie Nuclear Plant, Units 1 and 2, NUREG-1779, September 2003.
2. Generic Aging Lessons Learned (GALL) Report, NUREG-1801, Rev. 2, December 2010.
3. Non-Class 1 Mechanical Implementation Guideline and Mechanical Tools, Revision 4, TR 1010639.
4. PSL-ENG-LRAM-01-023, "CST Cross Connect Buried Piping Inspection License Renewal Basis Document."

The purpose of this letter is to update the Nuclear Regulatory Commission (NRC) that FPL has revised the commitment to perform a visual inspection to determine the extent of loss of material due to pitting and microbiologically induced corrosion on the external surfaces of the buried pipe that connects the St. Lucie Units 1 and 2 Condensate Storage Tanks.

Florida Power and Light Company (FPL) has a License Renewal (LR) commitment for St. Lucie Unit 1 to perform a one-time inspection of the Condensate Storage Tank Cross-Connect Buried Piping (plant specific program, Reference 1) prior to the end of the initial operating license term. Specifically, for St. Lucie Unit 1, Commitment 1 listed in Appendix D, Table 1 of Reference 1; states that inspection of the Condensate Storage Tank Cross-Connect Buried Piping will be performed prior to the end of the initial operating license term.

As described in the GALL Report (Reference 2), in AMP XI.M41, "buried piping and tanks are in direct contact with soil or concrete (e.g., a wall penetration). Underground piping and tanks are below grade, but are contained within a tunnel or vault such that they are in contact with air and are located where access for inspection is restricted." As shown in various GALL tables (Reference 2) for aging effect and aging mechanisms, the applicable aging effect/mechanism for stainless steel piping in soil or concrete is "loss of material due to pitting and crevice corrosion."

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As discussed in TR 1010639 (Reference 3), if the pipe is encased in concrete, corrosion/degradation of embedded metals is not an applicable aging effect.

As documented in ENG-LRAM-01-023 (Reference 4) an excavation was performed at the location with the expected worst case for potential corrosion. The subject pipe for the Condensate Storage Tank Cross-Connect Buried Piping Inspection was found encased in a concrete duct at the expected location.

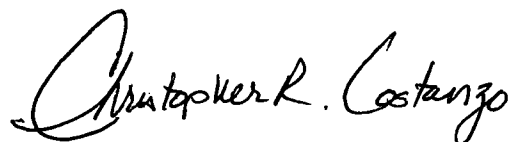
After reviewing the GALL Report (Reference 2) and TR 1010639 (Reference 3) it has been concluded that the subject pipe for Condensate Storage Tank Cross-Connect Buried Piping Inspection, as found encased in a concrete duct, is inaccessible; hence corrosion/degradation of embedded metals is not an applicable aging effect.

As described in Reference 1, Table 3.0.1-2, "System-Specific Aging Management Programs," the buried piping inspection for the Condensate Storage Tank Cross-Connect is a plant specific inspection for St. Lucie Unit 1 and not a GALL program inspection. The GALL Report is referenced herein to provide justification for not performing the inspections, since the subject pipe was found encased in a concrete duct.

The revised Commitment is provided herein in the attachment.

Should you have any questions, please contact Mr. Eric Katzman, Licensing Manager, at 772-467-7734.

Very truly yours,



Christopher R. Costanzo
Site Vice President
St. Lucie Plant

Attachment

**St. Lucie Unit 1 and Unit 2
License Renewal Revised Commitment**

Outstanding Commitment
(Reference 1 , Appendix D, Table 1)

St. Lucie Unit 1 Table 1 Commitment 1

Perform a visual inspection to determine the extent of loss of material due to pitting and microbiologically induced corrosion on the external surfaces of the buried pipe that connects the St. Lucie Units 1 and 2 Condensate Storage Tanks

Revised Commitment

St. Lucie Unit 1 Table 1 Commitment 1

The Subject pipe for Condensate Storage Tank Cross-Connect Buried Piping Inspection was found encased in a concrete duct and is inaccessible. Corrosion/degradation of embedded metals is not an applicable aging effect. No further inspections are required during the extended period of operation. The Condensate Storage Tank Cross-Connect Buried Piping Inspection (Unit 1 only) is a One Time Inspection Program only.

Reference Documents:

1. Safety Evaluation Report Related to the License Renewal of St. Lucie Nuclear Plant, Units 1 and 2, NUREG-1779, September 2003.
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