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 UHRIG, R.E. Florida Power & Light Co.
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 EISENHUT, D.G. Division of Licensing

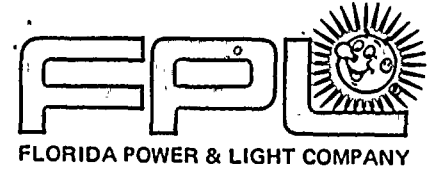
SUBJECT: Requests relief from Tech Spec 4.4.10.1.a & 10CFR50.55a(g) requirements re inservice insp. Relief requested due to problems w/thermal shield which necessitated removal of reactor internals.

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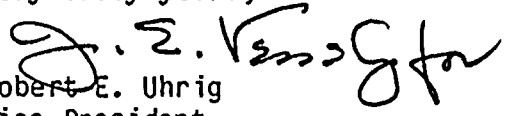
Office of Nuclear Reactor Regulation
Attention: Mr. Darrell G. Eisenhut, Director
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Eisenhut:

Re: St. Lucie Unit 1
Docket No. 50-335
Relief Request from Technical Specification
Inservice Inspection Requirements

Technical Specification 4.4.10.1.a and 10 CFR 50.55 a(g) contains certain ISI schedular requirements as well as a specific ASME Code Edition. Please find attached a relief request from certain of these requirements. This relief is required during the current extended outage caused by problems with the thermal shield which necessitated removal of the reactor internals. These requests have previously been discussed with your staff.

Very truly yours,


Robert E. Uhrig
Vice President
Advanced System & Technology

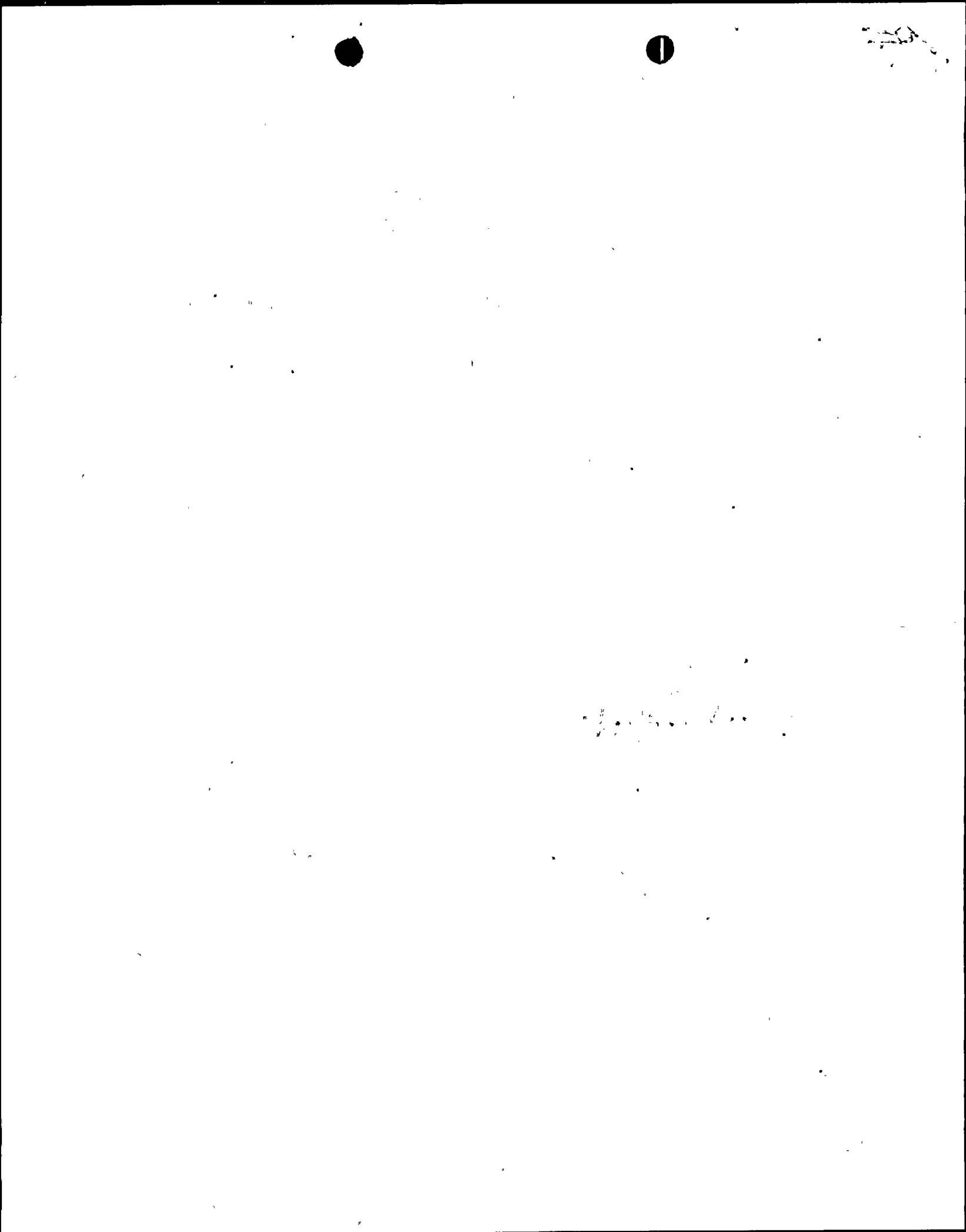
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Attachment

cc: Mr. James P. O'Reilly, Region II
Harold F. Reis, Esquire

A001

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PDR ADOCK 05000335
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St. Lucie Unit #1
Inservice Inspection

RELIEF REQUEST #1a

A. Component Identification: Class 1

1. Reactor Pressure Vessel, Excluding Closure Head
 - a. All pressure - retaining welds
 - b. All inside radiused sections
 - c. Interior clad surfaces
 - d. Interior surfaces and internal support attachments to vessel wall
 - e. Removable core - support structures

B. Examination Requirement:

1. Extent and frequency: The required examinations as applicable will be performed at or near the end of the 10-year Inspection Interval or when the internals are removed for other reasons certain examinations are subject to examination.

Basis: St. Lucie Unit 1 Tech Spec (i.e., 1971 Edition thru Winter 1972 Addenda and 10 CFR 50.55 a(g) (1974 Edition thru Summer 1975 Addenda)

C. Identification of Relief from Code Requirement:

1. FPL opts to conduct mechanized examinations of the reactor vessel during the second inspection period for credit in lieu of the end of the inspection interval (i.e., third inspection period).
2. FPL opts to conduct the following vessel examinations to the ASME 1977 Code Edition thru Summer 1978 Addenda, and R.G. 1.150, Revision 1, except for the following examinations, which were conducted during the first inspection period to the Tech Specs and the ASME 1974 Edition thru Summer 1975, which also meet the 1977 thru Summer 1978 requirements. These examinations include two (2) outlet nozzle-to-vessel welds and nozzle-to-vessel inside radiused sections, and were conducted from the inside bore of the nozzles.

- a. Examination Category B-A, First Inspection Interval.

The examinations shall include essentially 100% of the length of each circumferential and longitudinal weld in the vessel shell (which includes two (2) core belt region welds), shell-to-flange weld, and the accessible length of each circumferential and meridional weld in the vessel head.

- b. Examination category B-D, Inspection Program B, First Inspection Interval.

The examinations shall include 100% of each nozzle-to-vessel weld and adjacent areas (radiused sections).

c. Examination Category B-N-1.

The examination of the interior of the vessel.

d. Examination Category B-N-3.

The examination of the removable core support structures.

e. Examination Category B-J.

Pressure retaining weld in piping.

D. Basis for Relief:

1. The proximity to the end or near the end of the first inspection interval; i.e., FPL is currently in an extended outage and is nearing the end of the second inspection period (effective August 1983). During this outage, it was found necessary to remove the internals because of problems related to the reactor vessel thermal shield.
2. In order to maximize the benefits of inservice inspection of the vessel due to the problems associated with the thermal shield and its removal, and to provide information to address Pressurized Thermal Shock. The results of these data will be used to define specific flaw distribution by modifying the current conservative generic flaw distribution (OCTAVIA) assumed in licensing calculations in the absence of inservice inspection data.
3. Performing the examinations during the end of the second inspection period would minimize the hardships; i.e., economically and by the reduction of radiation exposure to personnel (current examinations range from 16.5 to 50 man-rem). As a consequence, there would be a compensatory increase in the level of quality and safety.
4. Performing the examinations to the ASME 1977 Code Edition thru Summer 1978 Addenda is consistent with the examinations conducted on St. Lucie Unit No. 2 and complies with the regulations of 10 CFR 50.55 a(g)4.

E. Alternative Examinations:

1. Perform a manual volumetric and surface examination of two (2) inlet nozzle-to-extension welds and extension-to-elbow welds (Category B-J).
Note: These welds are not classified as safe end welds by code definition.

F. Implementation Schedule:

1. Perform mechanized examination of the reactor vessel during the second inspection period for credit in lieu of the end of the Inspection Interval (i.e., third inspection period).