FLORIDA POWER & LIGHT COMPANY

OCT 4 1985
L-85-379

Office of Nuclear Reactor Regulation
Attention: Mr. Hugh L. Thompson, Jr., Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Thompson:

Re: St. Lucie Unit No. 1
Docket No. 50-335
Instrumented Inspection Technique (IIT)

The purpose of this letter is to request NRC approval to use an alternative inspection technique to satisfy the Inservice Pressure Testing requirements of the ASME Code, Section XI, as permitted by 10 CFR 50.55 a(a)(3). The details of this alternate inspection technique, Instrumented Inspection Technique (IIT) are the subject of a H.A.F.A. International Inc., Topical Report HAFA 135 (P). This topical report is currently under NRC review, and based on a meeting with NRC on September 24, 1985, it is our understanding that the topical will be approved in the near future.

The St. Lucie Unit 1 plant systems have been evaluated in accordance with Section IV of the Topical Report. Based on these evaluations, it has been determined that the IIT can be implemented on the following systems:

Reactor Coolant System
Low Pressure Safety Injection (LPSI)
High Pressure Safety Injection (HPSI)
Shutdown Cooling
Containment Spray
Charging
Letdown
Boric Acid Makeup
Waste Management
Main Steam
Feedwater
Auxiliary Feedwater
Steam Generator Blowdown
Component Cooling Water
Intake Cooling Water

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For the upcoming St. Lucie Unit 1 refueling outage, we intend to implement the IIT on the discharge side of the Charging System and on the Class 1 portions of the HPSI, LPSI and Letdown Systems. Although we have chosen to conduct the ASME Section XI Code "System Hydrostatic Test" of IWA-5211(d) on the NSSS portion of the Reactor Coolant System, the IIT may also be implemented selectively within that boundary.

St. Lucie Unit 1 is scheduled to shut down for refueling on October 20, 1985. Because we would like to implement the IIT on some of the above systems during the upcoming refueling outage, we request your approval by October 18, 1985. We are available at your convenience, if needed, to discuss this matter further.

It should be noted that FPL recognizes the capability of the IIT method to determine intersystem leakage, and therefore, may opt to take credit for this method to satisfy IST Program and Technical Specification requirements where appropriate.

Very truly yours,

J.W. Williams, Jr.
Group Vice President
Nuclear Energy

JWW/RJS/mls
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