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SUBJECT: Forwards inservice insp plan for second ten-year interval interim relief request 19.

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April 3, 1995

L-95-104  
10 CFR 50.4  
10 CFR 50.55a

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

RE: St. Lucie Unit 2  
Docket No. 50-389  
In-Service-Inspection Plan  
Second Ten-Year Interval  
Interim Relief Request 19

Pursuant to 10 CFR 50.55a (a)(3), Florida Power and Light Company (FPL) requests approval of interim relief request 19. FPL has determined pursuant to 10 CFR 50.55a (a)(3) that the proposed alternatives would provide an acceptable level of quality and safety, and that compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

This relief request is based on a series of conference calls between the NRC project manager, NRC ISI technical reviewers, and FPL during January, February, and March 1995. Approval is requested by July 1, 1995, in order to complete planning for the Fall 1995 Unit 2 outage.

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

Very truly yours,

A handwritten signature in dark ink, appearing to read 'D. A. Sager', is written over the typed name.

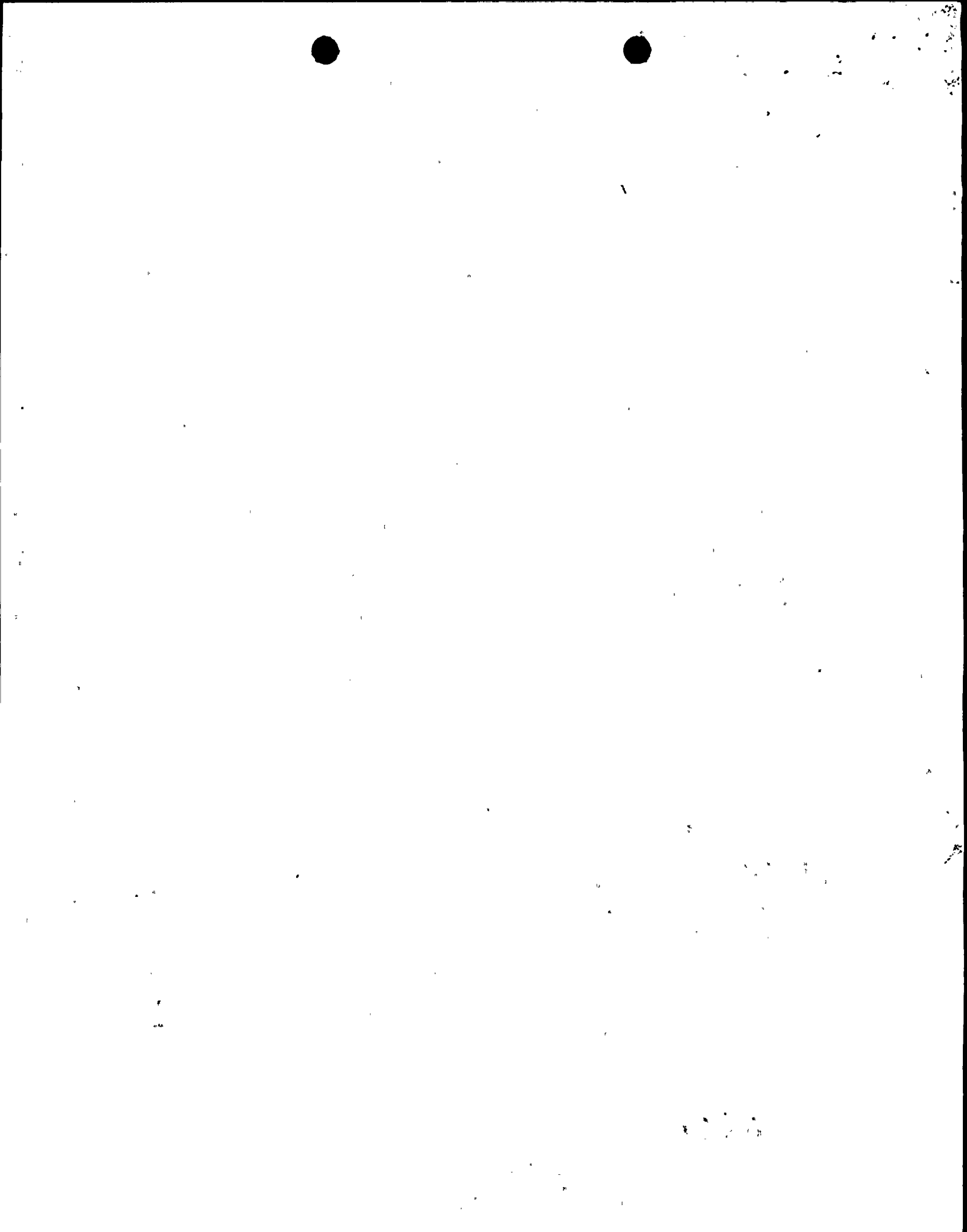
D. A. Sager  
Vice President  
St. Lucie Plant

DAS/GRM

cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC  
Senior Resident Inspector, USNRC, St. Lucie Plant

070049

Handwritten initials 'ADCK' in dark ink, located in the bottom right corner of the page.



**ST. LUCIE UNIT 2  
SECOND INSPECTION INTERVAL  
RELIEF REQUEST NUMBER 19**

**A. Component Identification:**

Code Class: Class 1 and Class 2  
Examination Category: B-P and C-H  
Systems: Reactor Coolant and Charging Systems  
Component Description: Pressure Retaining Bolted Connections  
Examination Method: Visual VT-2 Examination

**B. Examination Requirements:**

IWA-5242 Insulated Components

- (a) For systems borated for the purpose of controlling reactivity, insulation shall be removed from pressure retaining bolted connections for visual examination VT-2.

**C. Relief Requested:**

Florida Power and Light requests interim relief from removing the insulation from all pressure retaining borated bolted connections located on borated water systems during VT-2 examinations.

**D. Basis for Relief:**

For systems borated for the purpose of controlling reactivity, removal of insulation from bolted connections for the purpose of performing a visual examination for corrosion will involve a significant increase in man hours, radiation exposure, and material.

The quantity of bolted connections which will require insulation removal and restoration, as determined by an initial review of drawings and other design documents, involves a significant increase in the amount of man hours and material. This hardship in turn, results in escalated operations maintenance costs, and radiation exposure without a compensating increase in the level of quality and safety.

In an effort to minimize the impact of these examinations in the future, FPL will evaluate the feasibility and cost benefit of an insulation modification at applicable locations such that an examination may be performed without the need to remove insulation each time. The evaluation of the feasibility of this modification, however, cannot be completed until a walk down of the piping is performed. This walk down cannot be performed at power.

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This interim relief will provide time to resolve the scope of these examinations through the ASME Code process and evaluate the results of system walkdowns conducted inside containment to determine the feasibility of permanent design changes.

**E. Alternative Examinations**

Florida Power and Light will check bolted connections for leakage when performing system examinations as follows:

1. As soon as possible after coming offline for a refueling outage, a leak test is coordinated by the System Engineers inside the containment per the plant surveillance program.
2. During the outage, suitcase style insulation will be removed from the Reactor Coolant and Charging systems inside containment, and the connections visually examined (VT-2) for evidence of leakage when the plant is depressurized. When evidence of leakage is identified, repairs will be performed in accordance with the current maintenance work practices.
3. During the outage, any Class 1 or Class 2 insulated connections in Reactor Coolant and Charging systems inside containment that are disassembled will be examined for evidence of leakage by maintenance personnel. Repairs will be performed in accordance with the current maintenance work practices.
4. Prior to reactor criticality, following a refueling outage, a system leakage test is performed at Normal Operating Pressure and Temperature with a 4 hour hold time.

These Leakage Tests will include looking for the following conditions:

- a. Pooling of water directly under the bolted connections;
- b. Water leaking from the lowest elevation section of vertical lines containing bolted connections; and
- c. Discoloration or residue on surfaces examined shall be given particular attention to detect evidence of boric acid accumulations from borated reactor coolant leakage.

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SECOND INSPECTION INTERVAL  
RELIEF REQUEST NUMBER 19**

**F. Implementation Schedule**

**Second Inservice Inspection Interval, First Inspection Period**

**The upcoming St. Lucie Unit 2 refueling outage scheduled for September 25, 1995**

**G. Attachments**

**None**