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 SAGER, D.A. Florida Power & Light Co.
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SUBJECT: Submits requirements addressing pressurized thermal shock evaluation.

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L-95-315
10 CFR 50.4

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

RE: St. Lucie Unit 1
Docket No. 50-335
Pressurized Thermal Shock Evaluation

In a telephone call on October 17, 1995, NRC requested FPL to submit the bases for not providing the Pressurized Thermal Shock (PTS) evaluation with the proposed license amendment to extend the period of applicability for the existing St. Lucie Unit 1 P-T limits curve.

10 CFR 50.61 as issued in May 1991, requires a PTS evaluation and submittal at the next update of the pressure temperature (P-T) limits; the next reactor materials surveillance report; or five years from the effective date of the rule; which ever comes first. In addition, an update to the PTS submittal is required whenever there is a significant change in the projected values of RT_{PTS} or upon a request for a change in the facility operating license expiration date. Each of these requirements is addressed below:

- 1) In June 1995, FPL requested a license amendment to extend the period of applicability for the existing St. Lucie Unit 1 P-T limits from 15 effective full power years (EFPY) to 23.6 EFPY. There have been no changes to the curve "limits" since 1988.
- 2) The last materials surveillance report for St. Lucie Unit 1 was in February 1991. There has been no surveillance capsule activity for Unit 1 since then.
- 3) Five years from the effective date of the rule is May 1996.
- 4) FPL has affirmed, through our response to NRC Generic Letter 92-01 Supplement 1, Revision 1, that the end of life RT_{PTS} for St. Lucie Unit 1 is more than 30°F below the screening criteria.
- 5) The last change in the facility operating license expiration date was made by Amendment 82 issued on July 8, 1987.

In summary, since there were no changes to the curve "limits", just to the term of applicability, FPL did not consider this to trigger the "update" requirement. FPL interpreted this requirement to imply a technical change to the limits or a recalculation of the curves.

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L-95-315
St. Lucie Unit 1
Docket No. 50-335
Pressurized Thermal Shock Evaluation

FPL is planning to incorporate sister plant data into our PTS submittal and is in the process of obtaining and verifying the appropriate temperature data. Sister plant information was available only recently with the consolidation of the NRC Generic Letter (GL) 92-01 Rev 1 responses into the NRC database.

We are on schedule to meet the May 1996 requirement for PTS submittals for both units and intend to meet that schedule.

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

Very truly yours,



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