

March 10, 1997

Mr. Thomas F. Plunkett
President, Nuclear Division
Florida Power and Light Company
Post Office Box 14000
Juno Beach, Florida 33408-0420

SUBJECT: ST. LUCIE PLANT, UNIT NOS. 1 AND 2 - REQUEST FOR RELIEF FROM CODE
HYDROSTATIC PRESSURE TEST REQUIREMENT FOR INSERVICE INSPECTION
10-YEAR TESTING (TAC NOS. M97431 AND M97432)

Dear Mr. Plunkett:

The purpose of this letter is to authorize your proposed alternative (Code Case N-546) to the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code). In a letter dated November 27, 1996, Florida Power and Light Company (FPL) proposed an alternative to the requirements of the ASME Code. FPL requested approval to implement the ASME Code Case N-546 as an alternative to the rules of ASME Section XI pursuant to 10 CFR 50.55a(a)(3). Code Case N-546 permits the use of plant operators to perform VT-2 visual examinations during routine system pressure test walkdowns.

We have reviewed the information provided in the November 27, 1996, letter in support of the relief request. Based on the information submitted, the alternative requirement for qualification of VT-2 examination personnel contained in the proposal, use of Code Case N-546, is authorized pursuant to 10 CFR 50.55a(a)(3)(i) because the alternative provides an acceptable level of quality and safety. The alternative testing is authorized until such time as the Code Case is published in a future revision of Regulatory Guide (RG) 1.147. At that time, if you intend to continue to implement this Code Case, you should also implement any limitations issued in Regulatory Guide 1.147.

Sincerely,
Original signed by

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Frederick J. Hebdon, Director
Project Directorate II-3
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket Nos. 50-335 and 50-389

Enclosure: Safety Evaluation

cc w/enclosure: See next page

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Mr. T. F. Plunkett
Florida Power and Light Company

ST. LUCIE PLANT

cc:
Senior Resident Inspector
St. Lucie Plant
U.S. Nuclear Regulatory Commission
7585 S. Hwy A1A
Jensen Beach, Florida 34957

Regional Administrator
Region II
U.S. Nuclear Regulatory Commission
101 Marietta Street, NW. Suite 2900
Atlanta, Georgia 30323

Joe Myers, Director
Division of Emergency Preparedness
Department of Community Affairs
2740 Centerview Drive
Tallahassee, Florida 32399-2100

H. N. Paduano, Manager
Licensing & Special Programs
Florida Power and Light Company
P.O. Box 14000
Juno Beach, Florida 33408-0420

M. S. Ross, Attorney
Florida Power & Light
11770 US Highway 1
North Palm Beach, FL 33408

J. A. Stall, Site Vice President
St. Lucie Nuclear Plant
6351 South Ocean Drive
Jensen Beach, Florida 34957

John T. Butler, Esquire
Steel, Hector and Davis
4000 Southeast Financial Center
Miami, Florida 33131-2398

Mr. J. Scarola
Plant General Manager
St. Lucie Nuclear Plant
6351 South Ocean Drive
Jensen Beach, Florida 34957

Mr. Thomas R.L. Kindred
County Administrator
St. Lucie County
2300 Virginia Avenue
Fort Pierce, Florida 34982

Mr. Kerry Landis
U.S. Nuclear Regulatory Commission
101 Marietta Street, N.W. Suite 2900
Atlanta, Georgia 30323-0199

Mr. Bill Passeti
Office of Radiation Control
Department of Health and
Rehabilitative Services
1317 Winewood Blvd.
Tallahassee, Florida 32399-0700

E. J. Weinkam
Licensing Manager
St. Lucie Nuclear Plant
6351 South Ocean Drive
Jensen Beach, Florida 34957