



FPL :

Florida Power & Light Company, 6351 S. Ocean Drive, Jensen Beach, FL 34957

January 27, 1999

L-99-016
10 CFR 50.4
10 CFR 50.54 (f)

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

RE: St. Lucie Units 1 and 2
Docket No. 50- 335 and 50-389
Request for Additional Information
Response Generic Letter 97-01

The Florida Power and Light Company (FPL) supplement to the Generic Letter 97-01, *Degradation of Control Rod Drive Mechanism Nozzle and Other Vessel Closure Head Penetrations*, response for St. Lucie Units 1 and 2 is attached.

This supplement provides a response to the NRC request for additional information (RAI) dated September 30, 1998. In that request, the staff noted that other Combustion Engineering Owners Group (CEOG) member utilities had been issued similar staff requests and encouraged FPL to address the inquiries in an integrated fashion, as appropriate. FPL has participated with the CEOG and the industry to formulate generic responses to the staff requests. The Nuclear Energy Institute (NEI) submitted these generic responses under separate cover to the NRC on December 11, 1998, (NEI Letter, *Responses to NRC Requests for Additional Information on Generic Letter 97-01, Project Number 689*, David J. Modeen, NEI, to Gus C. Lainas, USNRC).

The attached responses provide the St. Lucie Units 1 and 2 information relative to the RAI. The NEI generic responses are incorporated by reference into the plant specific responses. Where FPL has specific information that supplements the NEI response, it is provided in the attachment. Please contact us if there are any questions about this submittal.

Very truly yours,

J. A. Stall
Vice President
St. Lucie Plant

JAS/GRM

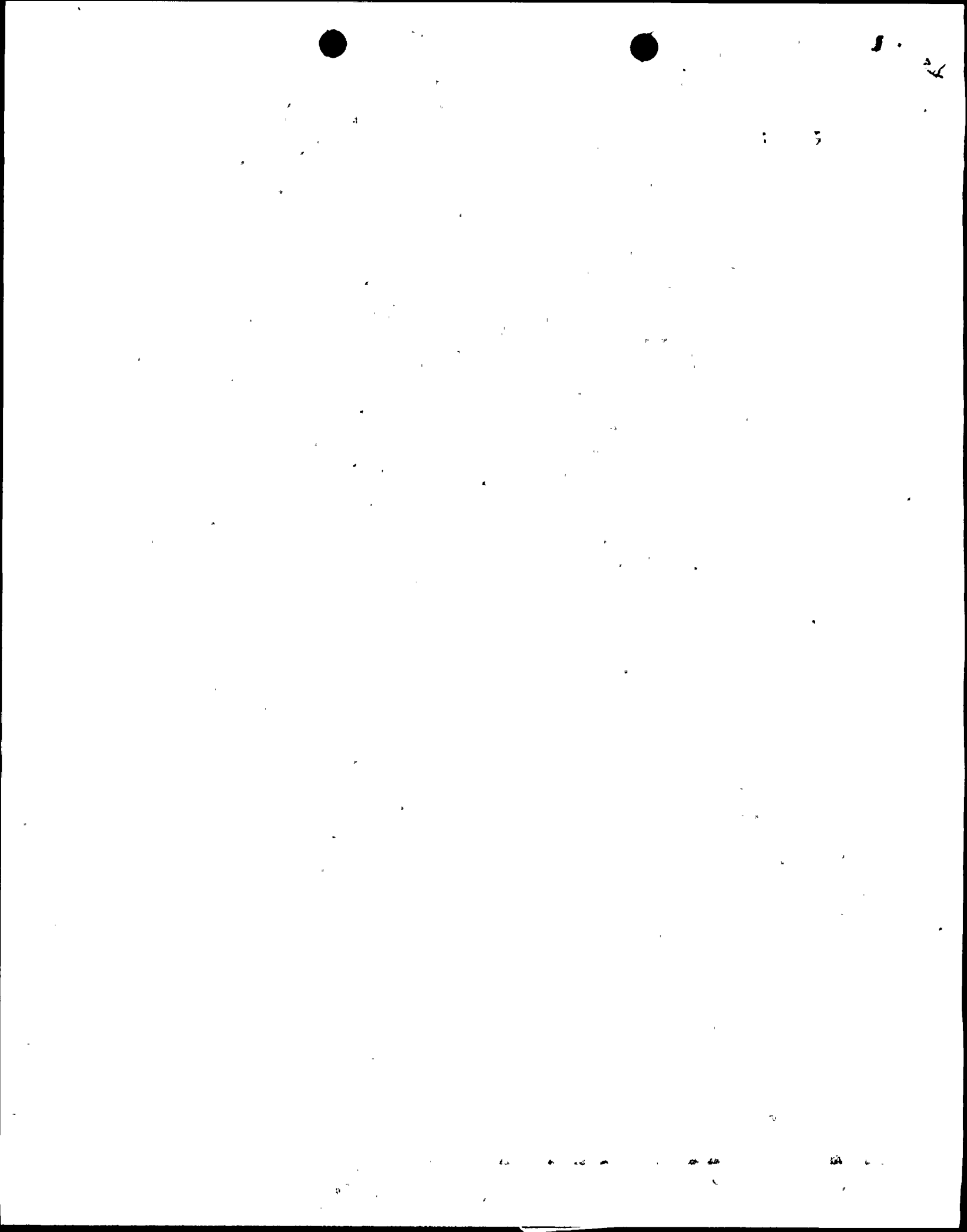
Attachment

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

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**St. Lucie Units 1 and 2
Generic Letter 97-01
Request for Additional Information Response**

References:

1. NRC Letter, *Request For Additional Information-Generic Letter 97-01, Degradation of CRDM/CEDM Nozzles and Other Vessel Closure Head Penetrations, Responses for St. Lucie Plant, Units 1 and 2 and Their Relationship to Topical Report No. CE NPSD-1085 (TAC NOS. M98600 and M98601)*, Letter from William C. Gleaves, NRC, to T. F. Plunkett, FPL, September 30, 1998.
2. NEI Letter, *Responses to NRC Requests for Additional Information on Generic Letter 97-01, Project Number 689*, David J. Modeen, NEI, to Gus C. Lainas, USNRC, December 11, 1998.

NRC Question:

Designate which crack susceptibility model is being endorsed for the assessment of CEDM penetration nozzles at your plant.

FPL Response:

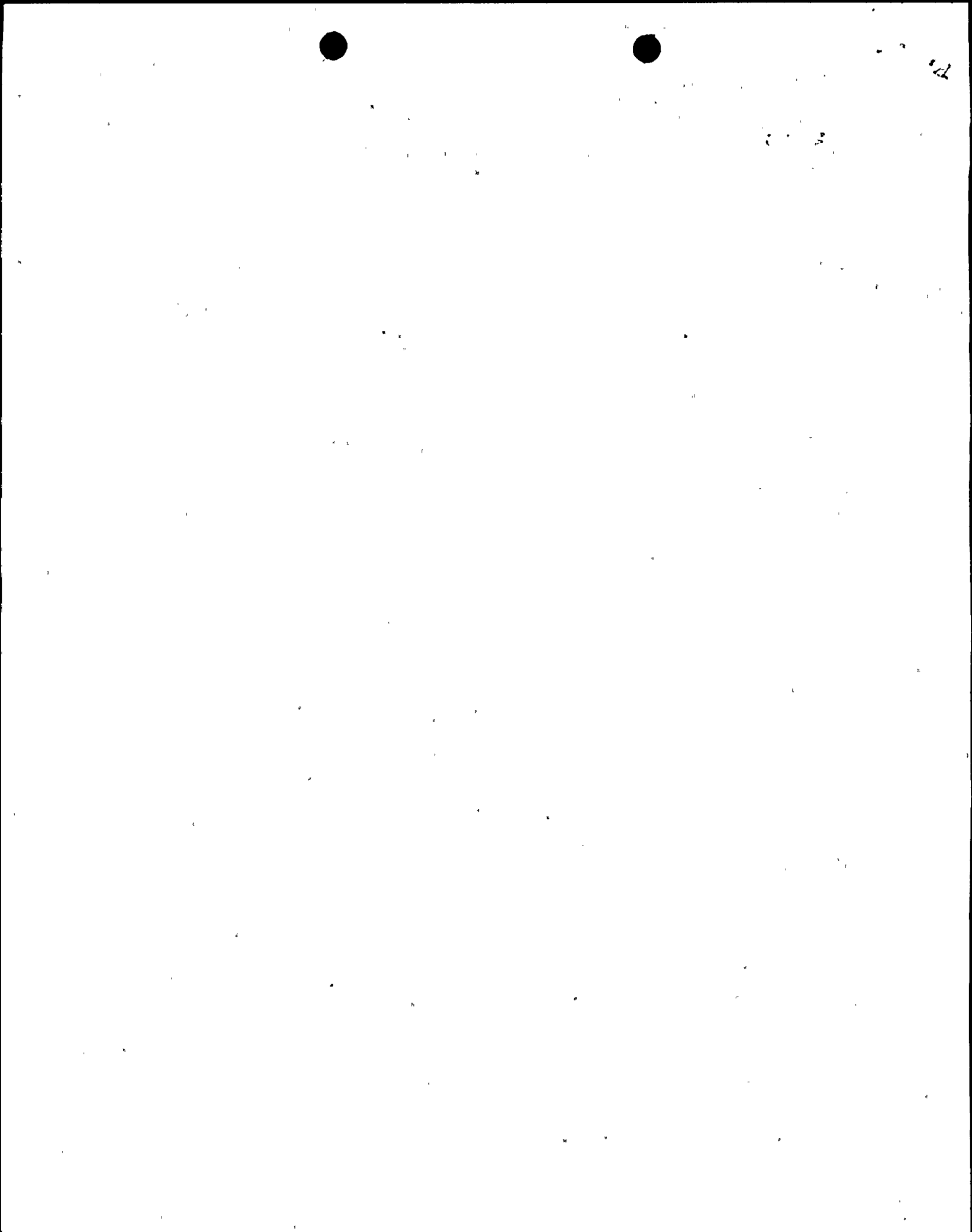
The response to this question is contained in Reference 2, Enclosure 4 entitled, *CEOG Responses to NRC Requests for Additional Information*, specifically the response to question 1 therein.

NRC Question:

Indicate how the susceptibility model being endorsed relates to the CEOG integrated program for assessing the CEDM penetration nozzles at ABB-CE designed plants, and whether or not the design of the susceptibility model is consistent with the contents of Topical Report CE NPSD-1085.

FPL Response:

The response to this question is contained in Reference 2, Enclosure 4, entitled, *CEOG Responses to NRC Requests for Additional Information*, and specifically the response to question 2 therein.



NRC Question:

If the ABB-CE PITM is being endorsed for the assessment of CEDM penetration nozzles at your plant, address the items a - e.

- a. Provide an expanded discussion and additional details describing how the time-to-failure model in the PITM relates to the PITM time-to-initiation model. In particular, include an expanded discussion of how the PITM model relates growth of postulated flaws to the time-to-initiation model, and how the two aspects relate to each other and to the probability of failure methodology.
- b. Provide the latest PITM susceptibility ranking of CEDM penetration nozzles, and if applicable of the vessel head instrumentation nozzles at your plant relative to the rankings of those at the other CEOG member plants.
- c. Provide a description of how the PITM for assessing postulated flaws in vessel head penetration nozzles was benchmarked, and list and discuss the benchmarking standard models.
- d. Provide any additional information regarding how the model will be refined to allow the input of plant-specific inspection data into the model's analysis methodology.
- e. Describe how the variability in the product forms, material specifications, and heat treatments used to fabricate each CEDM penetration nozzle at the CEOG member utilities are addressed in the PITM.

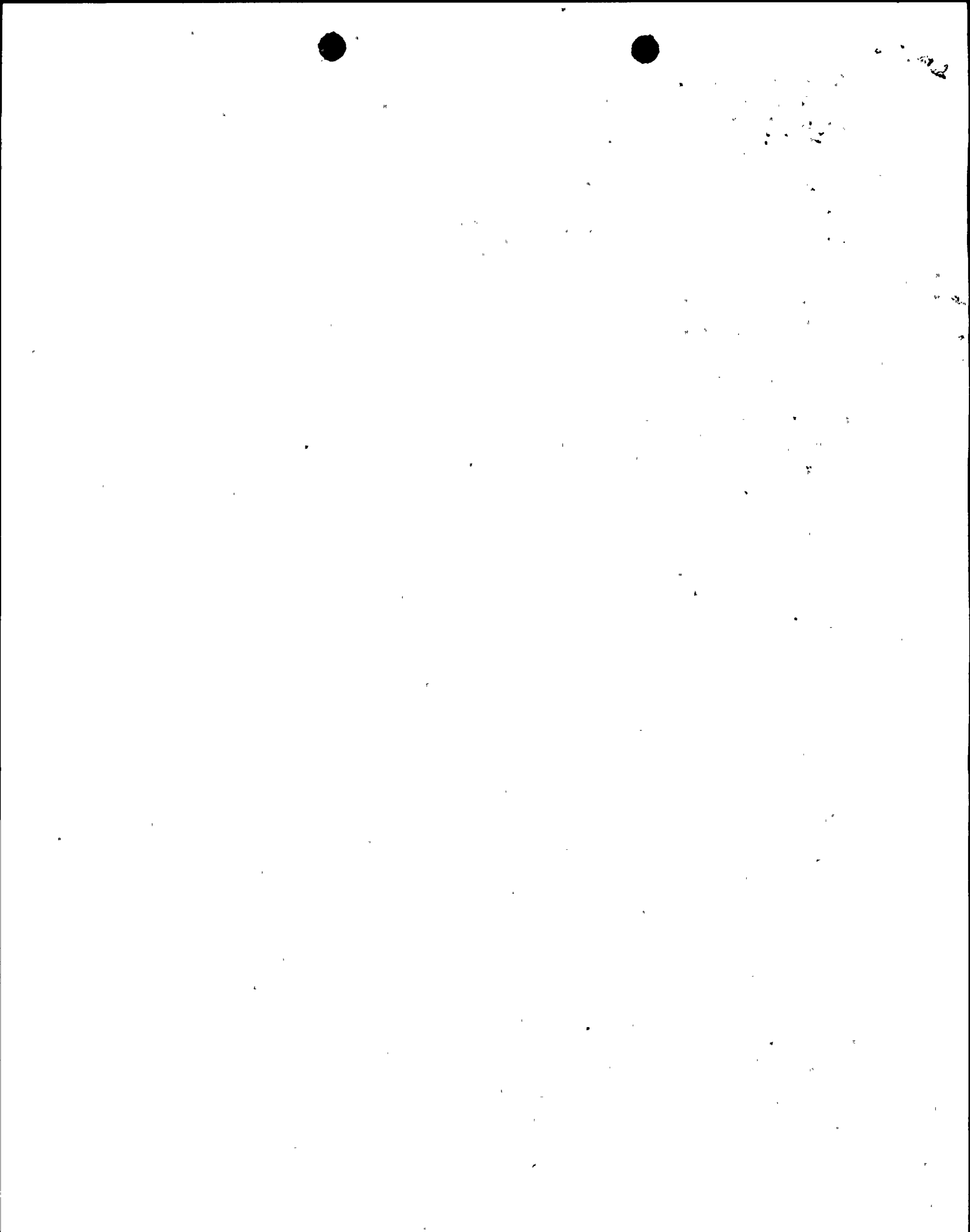
FPL Response:

The response to this question is contained in Reference 2, Enclosure 4 entitled, *CEOG Responses to NRC Requests for Additional Information*, specifically the response to question 1 therein. That response states, "The CEOG now endorses the use of the EPRI model for the assessment of PWSCC in Alloy 600 reactor vessel head penetrations."

Therefore, no response to items a - e is necessary.

NRC Question:

If the Dominion Engineering susceptibility model is being endorsed for the assessment of CEDM penetration nozzles at your plant, address the items g - k (assumed to be items a-d below as indicated in the NRC letter-Reference 1)



- a. Provide a description of how the various product forms, material specifications, and heat treatments used to fabricate each CEDM penetration nozzle at the CEOG member utilities are handled in the Dominion Engineering susceptibility model.
- b. Provide any additional information, if available, regarding how the model will be refined to allow the input of plant-specific inspection data into the model's analysis methodology.
- c. Describe how the Dominion Engineering crack initiation and crack growth models for assessing postulated flaws in vessel head penetration nozzles were bench-marked, and a listing and discussion of the bench-marking standard models.
- d. Provide the latest model susceptibility rankings of CEDM penetration nozzles in CEOG member plants based on the results of the Dominion Engineering susceptibility model analyses of these CEDM and ICI nozzles.

FPL Response:

The response to this question is contained in Reference 2, Enclosure 4 entitled, *CEOG Responses to NRC Requests for Additional Information*. Specifically, Questions a, b, c, and d above correspond to the Questions and Responses for item numbers 3, 5, 4 and 6 in Enclosure 4.

