

June 29, 1976  
L-76-241

Regulatory Docket File

Director of Nuclear Reactor Regulation  
Attn: Mr. Dennis L. Ziemann, Chief  
Operating Reactors Branch #2  
Division of Operating Reactors  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Ziemann:

Re: St. Lucie Unit 1  
Docket No. 50-335  
Inservice Inspection Period



Your letter of May 25, 1976 called attention to the fact that the inservice inspection requirements for ASME Code Class 1, 2, and 3 components were changed by a revision to 10 CFR 50.55a published on February 27, 1976. The revised regulations, which require that inservice inspection and testing be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and Addenda, are now effective for ST. Lucie Unit 1. We are now reviewing the appropriate edition of ASME Section XI to determine if there are conflicts between its requirements and the Technical Specifications presently in effect for St. Lucie Unit 1. To avoid such conflict, we will apply for an amendment to our Technical Specifications in accordance with §50.55a(g)(5)(ii). If we determine that conformance with certain ASME Section XI requirements is impractical, we will submit information to the Division of Operating Reactors in support of our determination in accordance with §50.55a(g)(5)(iii) and (iv).

The revised regulations also require that a request for amendment of Technical Specifications, including any information to support a determination that conformance with certain ASME Section XI requirements is impractical, must be submitted at least six months prior to the start of the inspection period during which the provisions become applicable for a facility. It will not be possible to do this for St. Lucie Unit 1 because that facility's first 40-month inspection period will commence with commercial operation which is expected sometime in early July 1976. Therefore, we request exemption from this requirement, and because of the extensive

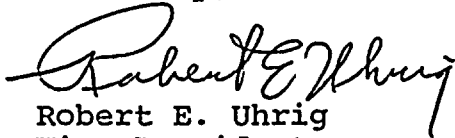
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review required in comparing the appropriate ASME Section XI requirements with our current Technical Specifications, propose that submittal of amended Technical Specifications and any determination of impracticability be deferred until July 1, 1977.

Sincerely,



Robert E. Uhrig  
Vice President

REU/MAS/hlc

cc: Norman C. Moseley, Region II  
Jack R. Newman, Esq.