



April 29, 1983
L-83-271

Office of Nuclear Reactor Regulation
Attention: Mr. Darrell G. Eisenhut, Director
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

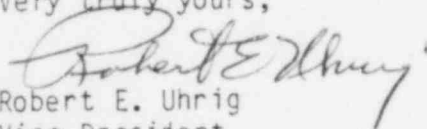
Dear Mr. Eisenhut:

Re: St. Lucie Unit 1
Docket No. 50-335
Relief Request from Technical Specification
Inservice Inspection Requirements

Technical Specification 4.4.10.1.a and 10 CFR 50.55 a(g) contain certain ISI requirements as well as a specific ASME Code Edition. Please find attached three relief requests from certain of these requirements. Approval of these requests is required during the current outage.

Should you or your staff have any questions on these requests, please contact us.

Very truly yours,


Robert E. Uhrig
Vice President
Advanced System & Technology

REU/PLP/mvt

Attachment

cc: Mr. James P. O'Reilly, Region II
Harold F. Reis, Esquire

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St. Lucie Unit #1
Inservice Inspection

RELIEF REQUEST NO. 2

A. Component Identification: Class 1

1. Code Examination Category B-I-1 Interior Clad Surfaces of Reactor Vessels, applies to Closure Head only.
2. Code Examination Category B-I-2 Interior Clad Surfaces of Vessels Other Than Reactor Vessels.

B. Examination Requirements:

1. Item B1.13 - Visual and Surface, or Volumetric Examination of reactor vessel closure head cladding, at least six patches, evenly distributed to be conducted during each Inspection Interval.
2. Item B2.9 and B3.8 - Visual examination of vessels other than reactor vessels (Pressurizer and Steam Generators) cladding, patches may be deferred to the end of the Inspection Interval.

Basis: St. Lucie Unit 1 Tech Spec (i.e., 1971 Edition thru Winter 1972 Addenda and 10 CFR 50.55 a (g), 1974 Edition thru Summer 1975 Addenda).

C. Identification of Relief From Code Requirement:

1. FPL requests relief from performing code examinations of interior clad surfaces of:
 1. Reactor Vessel Closure Head (Category B-I-1, Item B1.13) and
 2. Other Than Reactor Vessels (Pressurizer and Steam Generators) (Category B-I-2, Item B2.9 and B3.8)

D. Basis For Relief

1. Analysis has shown that flaws which may initiate in the reactor vessel cladding, at locations other than nozzles, are not likely to propagate through the clad-base metal interface. Because of this data, the need to confirm the initiation clad fissures is not considered relevant. Accordingly, the ASME code has completely eliminated the B-I-1 and B-I-2 Examination Categories from the later editions of Section XI.
2. Performing these cladding examinations constitutes needless radiation exposure to personnel with no compensatory increase in safety or quality. Current surveys have recorded levels of radiation ranging from 15 R to 35 R in the applicable areas of examinations of components subject to these examination requirements.

3. Pursuant to 10 CFR 50.55 a (g) (4) (iv), FPL opts to update to the requirements of the 1977 Edition thru Summer 1978 Addenda which deletes the examination requirement.

E. Alternate Examinations:

Not applicable.

F. Implementation Schedule:

Not applicable.

St. Lucie Unit #1
Inservice Inspection

RELIEF REQUEST NO. 3

A. Component Identification: Class 1

1. Code Examination Category, B-K-1, Support Members for Piping, Valves and Pumps.

B. Examination Requirements:

1. Item B4.9 - Piping Integrally welded supports
2. Item B5.4 - Pump Intergrally welded supports
3. Item B6.4 - Valve Integrally welded supports

Volumetric Examinations of support attachments shall cover 25% of the integrally welded supports during each Inspection Interval.

Basis: St. Lucie Unit 1 Tech Spec (i.e., 1971 Edition thru Winter 1972 Addenda and 10 CFR 50.55 a (g), 1974 Edition thru Summer 1975 Addenda).

C. Identification of Relief From Code Requirements:

1. FPL opts to conduct Surface Examinations in lieu of Volumetric Examinations of integrally welded support members for piping, valves and pumps for Examination Category B-K-1 (items B4.9, B5.4 and B6.4).

D. Basis For Relief:

1. Volumetric Examinations on numerous integrally welded support members are found to be impractical. Because of the design and configuration, these welds are not conducive to meaningful nor conclusive ultrasonic or radiographic examinations.
2. Pursuant to 10 CFR 50.55 a (g) (4) (iv), FPL opts to update to the examination requirements of the 1977 Edition thru Summer 1978 Addenda which permits the licensee to substitute surface for Volumetric Examination.

E. Alternate Examinations:

Perform Surface Examinations on integrally welded supports (Category B-K-1) to ASME 1977 Code Edition thru Summer 1978 Addenda. The examinations include only those attachments whose base material design thickness is 5/8 inch and greater. The examination shall include the component supports of the piping required to be examined by Category B-J, and the component support of pumps and valves integral to such piping. Essentially 100% of weld length is included.

F. Implementation Schedule:

The examinations shall cover 25% of the integrally welded supports during the Inspection Interval.

St. Lucie Unit #1
Inservice Inspection

RELIEF REQUEST NO. 4

A. Component Identification: Class 1

Code Examination Category B-J Pressure Containing Welds In Piping.

B. Examination Requirements:

Item B4.5 Piping Circumferential and Longitudinal Welds. Volumetric Examination of circumferential welds and the base metal for one wall thickness beyond the edge of the weld.

Basis: St. Lucie Unit 1 Tech Spec (i.e., 1971 Edition thru Winter 1972 Addenda and 10 CFR 50.55 a (g), 1974 Edition thru Summer 1975 Addenda.

C. Identification of Relief From Code Requirement:

FPL opts to conduct Surface Examinations in lieu of Volumetric Examinations of the piping circumferential welds and base metal beyond the edge of the welds within the limitations of existing configurations for Examination Category B-J (Item B4.5). See attached sketch of "Typical Configuration".

D. Basis For Relief:

1. Volumetric Examinations of the piping circumferential welds and base metal beyond the edge of the welds are found to be impractical. Because of the design and configuration, these welds are not conducive to Ultrasonic Examination and do not lend themselves to good Radiographic Examination technique.
2. The code (Examination Category B-J, Item B4.7) permits Surface Examination of Branch Pipe Connection welds six (6) inch diameter and smaller. This is somewhat typical and consistent with the pipe to tee welds which are six (6) inch nominal pipe diameter (see attached sketch).
3. Conduct of the Volumetric Examinations to meet the code would constitute undue hardship and unusual difficulty without a compensatory increase in the level of quality and safety.

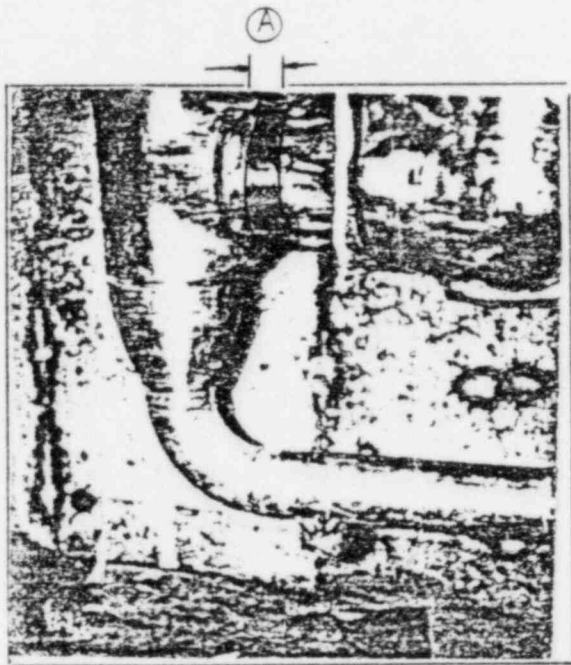
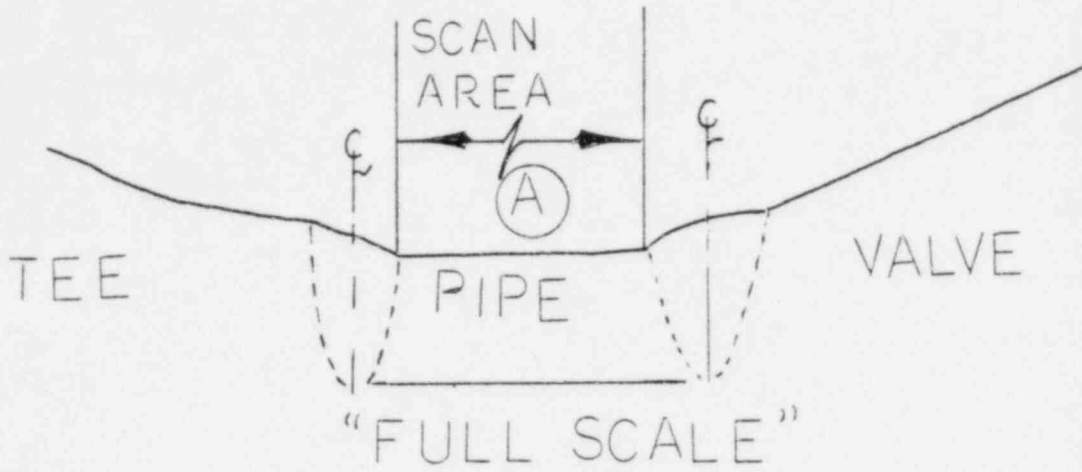
E. Alternative Examinations:

Perform Surface Examinations on the piping circumferential welds and base metal beyond the edge of the welds within the limitations of existing configurations for Examination Category B-J (Item B4.5).

F. Implementation Schedule:

The examinations shall cover 25% of the circumferential joints during each Inspection Interval.

ST. LUCIE UNIT NO.1
ATTACHMENT-RELIEF REQUEST NO.4



(A) DIMENSION
1.25"
1.93"
2.0"

"PHOTO"

6" NOM. PIPE DIA.

"TYPICAL CONFIGURATION"

ST. LUCIE UNIT NO. 1

ATTACHMENT - RELIEF REQUEST NO. 4

SYSTEM	WELD IDENTIFICATION	DESCRIPTION
SAFETY INJECTION	6"-SI-112-2	TEE TO PIPE
SAFETY INJECTION	6"-SI-112-2a	PIPE TO VALVE CV-3124
SAFETY INJECTION	6"-SI-113-2	TEE TO PIPE
SAFETY INJECTION	6"-SI-113-2a	PIPE TO VALVE CV-3114
SAFETY INJECTION	6"-SI-110-2	TEE TO VALVE CV-3144
SAFETY INJECTION	6"-SI-111-2	TEE TO VALVE CV-3134