March 28, 2024
L-2024-047
10 CFR 50.55a

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington D C 20555-0001

RE: St. Lucie Nuclear Plant, Unit 2
Docket No. 50-389
Renewed Facility Operating License NPF-16

Turkey Point Nuclear Plant, Unit 3 and 4
Docket Nos. 50-250 and 50-251
Subsequent Renewed Facility Operating Licenses DPR-31 and DPR-41

Proposed Use of a Subsequent ASME Code Edition and Addenda

Pursuant to 10 CFR 50.55a(g)(4)(iv), Florida Power & Light Company (FPL) hereby requests authorization to adopt the 2019 Edition of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI (ASME BPV Code, Section XI), for the St. Lucie Unit 2 Fifth 10-Year Inservice Inspection (ISI) Interval and the Turkey Point Unit 3 and Unit 4 (Turkey Point) Sixth 10-Year ISI Intervals. The proposed change would implement a later edition of the ASME BPV Code, Section XI, than the Code of Record for St. Lucie Unit 2 and Turkey Point in accordance with 10 CFR 50.55a(g)(4)(ii). The 2019 Edition of the ASME BPV Code, Section XI, was incorporated by reference in 10 CFR 50.55a(a)(1)(ii)(C) for licensee ISI programs, as published in *Federal Register* 87 FR 6512. Implementation of the 2019 Edition of the ASME BPV Code, Section XI, serves to enhance overall quality and safety at FPL's nuclear facilities by establishing to the extent practical, a unified set of inservice inspection requirements.

The enclosure to this letter provides details of the proposed change. Approval is requested by July 31, 2024, to support St. Lucie Unit 2 and Turkey Point Unit 3 scheduled refueling outages in Fall 2024.

This letter contains no new or modified regulatory commitments.

Should you have any questions regarding this submission, please contact Mr. Kenneth Mack, Fleet Licensing Manager, at 561-904-3635.

Steve Catron
Licensing & Regulatory Compliance Director - Nuclear Fleet
Florida Power & Light Company

cc: USNRC Regional Administrator, Region II
USNRC Project Manager, St. Lucie Nuclear Plant, Units 1 and 2
USNRC Senior Resident Inspector, St. Lucie Nuclear Plant, Units 1 and 2
USNRC Project Manager, Turkey Point Nuclear Generating Station
USNRC Senior Resident Inspector, Turkey Point Nuclear Generating Station
Mr. Clark Eldredge, Florida Department of Health

Enclosure:

Proposed Use of Subsequent ASME Code Edition and Addenda
In Accordance with 10 CFR 50.55a(g)(4)(iv)

In accordance with 10 CFR 50.55a, "Codes and standards," paragraph (g)(4)(iv) and the guidance provided in Reference 2, Florida Power and Light Company (FPL) requests NRC approval to use provisions of a later edition of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI (ASME BPV Code, Section XI), for St. Lucie Plant Unit No. 2 (St. Lucie Unit 2), Turkey Point Nuclear Generating Unit No. 3 (Turkey Point Unit 3) and Turkey Point Nuclear Generating Unit No. 4 (Turkey Point Unit 4). Specifically, FPL requests approval to use the 2019 Edition of ASME BPV Code, Section XI, for the St. Lucie Unit 2 Fifth 10-Year Interval Inservice Inspection (ISI) Program and the Turkey Point Unit 3 and Turkey Point Unit 4 Sixth 10-Year Interval ISI Programs.

1. ASME Code Component(s) Affected:

   All Class 1, 2 and 3 components, supports, and items within the ASME Section XI boundaries.

2. Requested Date for Approval:

   Approval requested by July 31, 2024.

3. Applicable Code Edition and Addenda:

   3.1 The ISI Program for the St. Lucie Unit 2, Fourth 10-Year ISI Interval was based on the 2007 Edition of ASME BPV Code, Section XI, with the 2008 Addenda. The Fourth 10-Year ISI Interval began August 8, 2013, and ended August 7, 2023.

   Note that the applicable Code of Record for the St. Lucie Unit 2 ISI Program in accordance with 10 CFR 50.55a(g)(4)(ii), *Applicable ISI Code: Successive 120-month Intervals*, would be the 2017 Edition of ASME BPV Code, Section XI, based on the Fifth 10-Year ISI Interval for St. Lucie Unit 2 beginning on August 8, 2023.

   3.2 The ISI Program for Turkey Point Unit 3, Fifth 10-Year ISI Program was based on the 2007 Edition of ASME BPV Code, Section XI, with the 2008 Addenda. The Fifth 10-Year ISI Interval began on February 22, 2014, and ends on February 21, 2024.

   Note that the applicable Code of Record for the Turkey Point Unit 3 ISI Program in accordance with 10 CFR 50.55a(g)(4)(ii) would be the 2017 Edition of ASME BPV Code, Section XI, based on the Sixth ISI 10-Year Interval for Turkey Point Unit 3 beginning on February 22, 2024.

   3.3 The ISI Program for Turkey Point Unit 4, Fifth 10-Year ISI Program was based on the 2007 Edition of ASME BPV Code, Section XI, with the 2008 Addenda. The Fifth 10-Year ISI Interval began on April 15, 2014, and ends on April 14, 2024.

   Note that the applicable Code of Record for the Turkey Point Unit 4 ISI Program in accordance with 10 CFR 50.55a(g)(4)(ii) would be the 2017 Edition of ASME BPV Code, Section XI, based on the Sixth ISI 10-Year Interval for Turkey Point Unit 4 beginning on April 15, 2024.

4. Proposed Subsequent Code Edition and Addenda:

   Pursuant to 10 CFR 50.55a(g)(4)(iv), FPL requests approval to utilize the 2019 Edition of ASME BPV Code, Section XI, for the St. Lucie Unit 2 Fifth 10-Year Interval ISI Program and the Turkey Point Unit 3 and Turkey Point Unit 4 Sixth 10-Year Interval ISI Programs.

   The proposed change would provide to the extent practical, a unified set of inservice inspection requirements for the FPL Fleet of nuclear reactors. Having the Fleet 10-Year Interval ISI Programs using the same Code of Record provides many implementation benefits which will maintain the existing level of quality and safety and provides cohesive programs for ISI, repairs, replacements,

and pressure testing. Employing different Codes of Record at multiple sites can create procedural and programmatic differences that could potentially result in implementation errors.

FPL has elected to implement the 2019 Edition of ASME BPV Code, Section XI, as the ISI Program Code of Record at St. Lucie Unit 2, Turkey Point Unit 3 and Turkey Point Unit 4, subject to the conditions listed in (b). The 2019 Edition represents the most recent version of ASME BPV Code, Section XI, incorporated by reference in 10 CFR 50.55a, Codes and Standards, thereby providing the most current NRC-approved requirements including incorporated ASME Code Cases.

5. Related Requirements:

10 CFR 50.55a(g)(4)(iv), Applicable ISI Code: Use of Subsequent Code Editions and Addenda, states:

"Inservice examination of components and system pressure tests may meet the requirements set forth in subsequent editions and addenda that are incorporated by reference in paragraph (a) of this section, subject to the conditions listed in paragraph (b) of this section, and subject to Commission approval. Portions of editions or addenda may be used, provided that all related requirements of the respective editions or addenda are met."

10 CFR 50.55a(a)(1)(ii)(C) incorporates by reference Section XI, Division 1, of the ASME BPV Code, Section XI, 2019 Edition as approved in Reference 3.

6. Duration of Proposed Request:

The duration of this proposed request would apply for the entirety of the ISI Intervals specified below:

Plant	10-Year ISI Interval	ISI Interval Start Date	ISI Interval End Date
St. Lucie Unit 2	5th	August 8, 2023	August 7, 2033
Turkey Point Unit 3	6th	February 22, 2024	February 21, 2034
Turkey Point Unit 4	6th	April 15, 2024	April 14, 2034

7. References**:**

7.1 10CFR50.55a, *Codes and standards,* dated January 1, 2022.

7.2 NRC Regulatory Issue Summary 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI," dated July 28, 2004.

7.3 Federal Register, Final Rule dated October 27, 2022, 87 FR 65128, American Society of Mechanical Engineers 2019–2020 Code Editions.