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U.S. Nuclear Regulatory Commission
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St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
License Renewal One-Time Inspection of Class 1 Small Bore Piping
Revised Commitments

References:

1. Safety Evaluation Report Related to the License Renewal of St. Lucie Nuclear Plant, Units 1 and 2, NUREG-1779, September 2003.
2. Generic Aging Lessons Learned (GALL) Report, NUREG-1801, Rev. 2, December 2010.

Florida Power and Light Company (FPL) has License Renewal (LR) commitments for St. Lucie Units 1 and 2 to perform a one-time inspection of Class 1 Small Bore Piping prior to the end of the initial operating license term. Specifically, for St. Lucie Unit 1, Commitment 7 listed in Appendix D, Table 1 of Reference 1 and for St. Lucie Unit 2, Commitment 6 listed in Appendix D, Table 2 of Reference 1; state that volumetric inspections of a sample of small bore Class 1 piping will be performed prior to the end of the initial operating license term.

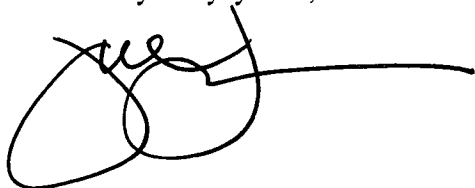
The purpose of this letter is to update the Nuclear Regulatory Commission (NRC) that FPL has revised these commitments such that this one-time inspection will follow the guidance provided in the Generic Aging Lessons Learned (GALL) Report, NUREG-1801, Rev 2, Section AMP XI.M35, "One-Time Inspection of ASME Code Class 1 Small-Bore Piping" (Reference 2). Specifically, as identified above, Commitment 7 for St. Lucie Unit 1 and Commitment 6 for St. Lucie Unit 2 are revised to clarify that based on the guidance provided in the GALL Report, a destructive examination may be performed in lieu of volumetric examination for socket welds. Based on the recommendations of GALL AMP XI.M35, Rev 2, FPL may take credit for each socket weld that is destructively examined as being equivalent to volumetrically examining two socket welds because more information can be obtained from a destructive examination than from a nondestructive examination. Additionally, Commitment 7 for Unit 1 and Commitment 6 for Unit 2 are revised to state that this one-time inspection will address Class 1 piping less than 4 inches nominal pipe size (less than NPS 4) and greater than or equal to NPS 1, because ASME Code provisions and GALL AMP XI.M35 recommendations exempt piping smaller than NPS 1 from examination.

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NRC

The revised Commitments are provided herein in the Attachment.

Should you have any questions, please contact Mr. Eric Katzman, Licensing Manager, at 772-467-7734.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Jensen', with a long horizontal line extending to the right.

Joseph Jensen
Site Vice President
St. Lucie Plant

Attachment

**St. Lucie Unit 1 and Unit 2
License Renewal Revised Commitments**

Outstanding Commitments
(Reference 1, Appendix D, Table 1 and Table 2)

St. Lucie Unit 1 Table 1 Commitment 7
St. Lucie Unit 2 Table 2 Commitment 6

A volumetric inspection of a sample of small bore Class 1 piping and nozzles will be performed

Revised Commitments

St. Lucie Unit 1 Table 1 Commitment 7
St. Lucie Unit 2 Table 2 Commitment 6

A volumetric inspection of a sample of small bore Class 1 piping and nozzles will be performed. Based on the guidance provided in the GALL Report, Section AMP XI.M35, a destructive examination may be performed in lieu of the volumetric examination. For each socket weld that is destructively examined credit may be taken as being equivalent to volumetrically examining two socket welds. This one-time inspection will address Class 1 piping less than 4 inches nominal pipe size (less than NPS 4) and greater than or equal to NPS 1.

Reference Documents:

1. Safety Evaluation Report Related to the License Renewal of St. Lucie Nuclear Plant, Units 1 and 2, NUREG-1779, September 2003.
2. Generic Aging Lessons Learned (GALL) Report, NUREG-1801, Rev. 2, December 2010.