



April 29, 2003

L-2003-113  
EA-03-009(IV)(F)(2)

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

Re: St. Lucie Unit 2  
Docket No. 50-389  
Order (EA-03-009)  
Relaxation Requests 1 and 2 - Supplement 2

On February 11, 2003, the NRC issued Order (EA-03-009) requiring specific inspections of the reactor pressure vessel head (RPVH) and associated penetration nozzles at pressurized water reactors. On March 28, 2003, pursuant to the procedure specified in Section IV, paragraph F of the Order, Florida Power & Light Company (FPL) requested relaxation from the requirements specified in Section IV, paragraph C.(1)(b)(i) for St. Lucie Unit 2 for the RPVH penetration nozzles for which ultrasonic testing requirements can not be completed as required. Relaxation was also requested from the requirements specified in Section IV, paragraph C.(1)(a) for an area of the reactor head surface that is inaccessible for visual inspection. On April 14, 2003, FPL met with the NRC technical staff to discuss the FPL relaxation requests. FPL letter L-2003-101 supplemented the relaxation requests on April 18, 2003 in response to NRC requests for additional information during the April 14, 2003 meeting.

On April 28, 2003, the NRC requested FPL to confirm the acceptability of certain conditions to be imposed by the NRC safety evaluation. In support of the approval of Relaxation Request No. 1, FPL concurs with the following condition.

*If the NRC staff finds that the crack growth formula in industry report MRP-55 is unacceptable, the licensee shall revise its analysis that justifies relaxation of the Order within 30 days after the NRC informs the licensee of an NRC-approved crack growth formula. If the licensee's revised analysis shows that the crack growth acceptance criteria are exceeded prior to the end of the current operating cycle, this relaxation is rescinded and the licensee shall, within 72 hours, submit to the NRC written justification for continued operation. If the revised analysis shows that the crack growth acceptance criteria are exceeded during the subsequent operating cycle, the licensee shall, within 30 days, submit the revised analysis for NRC review. If the revised analysis shows that the crack growth acceptance criteria are not exceeded during either the current operating cycle or the subsequent operating cycle, the licensee shall, within 30 days, submit a letter to the NRC confirming that its analysis has been revised.*

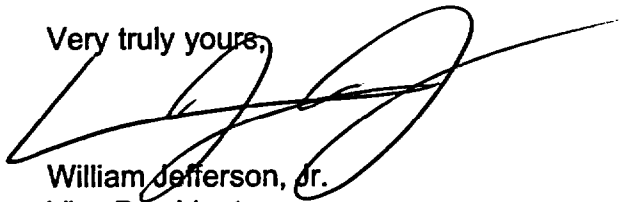
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In support of the approval of Relaxation Request No. 2, FPL concurs with the following condition.

*Should there be any evidence of corrosive product upslope or downslope of the inaccessible areas, the relaxation is rescinded until such time that the licensee can provide adequate information to the staff that ensures that the RPVH is not degraded in the inaccessible areas.*

For any additional questions about these relaxation requests, please contact George Madden at (772) 467-7155.

Very truly yours,

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

William Jefferson, Jr.  
Vice President  
St. Lucie Plant

WJ/GRM