



FPL

NOV 15 2000

L-2000-248
10 CFR 50.55a

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

Re: Turkey Point Unit 3
Docket No. 50-250
Response to NRC Request for Additional Information related to
Turkey Point Unit 3 Risk-Informed Inservice Inspection Program

By letters L-2000-010 and L-2000-140, dated January 19, 2000, and July 13, 2000, respectively, Florida Power and Light Company (FPL) requested to revise the Turkey Point Unit 3 ISI Program for Class 1 piping only, through the use of the Risk-Informed Inservice Inspection Program (RI-ISI) as an alternative to the current requirements of the ASME Boiler and Pressure Vessel Code Section XI, 1989 Edition, as required by 10 CFR 50.55a.

FPL received an NRC Request for Additional Information (RAI) related to the above submittals by electronic mail dated September 8, 2000. FPL response to the NRC RAI related to Turkey Point Unit 3 Risk-Informed Inservice Inspection Program is provided in the attachment to this letter.

Should there be any questions concerning this submittal, please contact us.

Very truly yours,


R. J. Hovey
Vice President
Turkey Point Plant

CLM

Attachment

cc: Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant

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**FPL response to NRC Request for Additional Information (RAI) related to
Turkey Point Unit 3 Risk-Informed Inservice Inspection Program**

FPL response to NRC Request for Additional Information received in two sets by electronic mail dated September 8, 2000, related to Turkey Point Unit 3 Risk-Informed Inservice Inspection (RI-ISI) Program is provided below:

1. According to an ASME Code Case under preparation, elements subject to external chloride stress corrosion cracking (ECSCC) should be examined by surface examination methods. Please state if any of Turkey Point Class 1 socket weld locations being examined by VT-2 is susceptible to ECSCC.

Response: As per Table 2 of the draft Code Case, the Turkey Point Class 1 socket welds do not meet the susceptibility criteria specified.

2. Please state if any of Turkey Point Class 1 socket weld locations being examined by VT-2 is susceptible to any other outside diameter (OD) initiated degradation mechanism such as thermal fatigue, etc.

Response: No other outside diameter (OD) initiated degradation mechanism has been identified for Turkey Point Class 1 socket welds.

3. If not susceptible to ECSCC/OD initiated thermal fatigue for the scope covered by the proposed RI-ISI program, what locations in the plant may be affected by such a mechanism?

Response: As previously stated in response to questions 1 and 2 above, no susceptibility was identified to ECSCC/OD initiated thermal fatigue for the Class 1 socket welds.

Susceptibility to OD initiated thermal fatigue has not been identified for any locations at Turkey Point, although an exhaustive review has not been conducted.

Susceptibility to OD stress cracking has been identified for CVCS Boron Recovery piping (small-bore piping, formerly heat-traced), and for some large-bore thin-wall ECCS piping. Turkey Point's license renewal application (L-2000-177), discusses these susceptibilities in Sections 3.3 and 3.4. The review done for the license renewal application did not characterize the mechanism (like external chloride stress corrosion), just the susceptibility to the aging effect (cracking), and addresses management of the aging effect per the requirements of 10CFR54.