



APR 12 2001  
L-2001-080  
10 CFR 50.55a

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


Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Metal Containment Inservice Inspection Program  
Relief Requests No. 22 and No. 26

Pursuant to 10 CFR 50.55a (a)(3), Florida Power & Light Company (FPL) requests approval of IWE Relief Requests No. 22 and No. 26.

FPL has determined pursuant to 10 CFR 50.55a (a)(3)(ii) that compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. IWE Relief Request No. 22 requests relief from the required bolt torque or tension test of the bolted connections as specified in Table IWE-2500-1, Category E-G, Item E8.20, of the 1992 Edition, with 1992 Addenda of ASME Section XI. IWE Relief Request No. 26 requests relief from the required visual examination (VT-3) of the seals and gaskets as specified in Table IWE-2500-1, Category E-D, Items E5.10 and E5.20, of the 1992 Edition, with 1992 Addenda of ASME Section XI. These Relief Requests are similar to those approved by the Nuclear Regulatory Commission (NRC) for FPL's St. Lucie Units 1 and 2.

Approval of the above IWE Relief Requests is requested by August 31, 2001 to support planning for the next Turkey Point Unit 3 refueling outage scheduled for the Fall 2001. Please contact Steve Franzone at (305) 246-6228, if there are any questions about this submittal.

Very truly yours,

  
R. J. Hovey  
Vice President  
Turkey Point Plant

Attachments (2)

cc: Regional Administrator, Region II, USNRC  
Senior Resident Inspector, USNRC, Turkey Point Plant  
Florida Department of Health and Rehabilitative Services

**Relief Request No. 22**  
**Relief from Examination Requirements for Bolt Torque or Tension Testing**

**I. COMPONENT IDENTIFICATION:**

ASME Section XI, Class MC, Pressure retaining bolting at Turkey Point Units 3 and 4.

**II. EXAMINATION REQUIREMENTS:**

Table IWE-2500-1, Examination Category E-G, of ASME Section XI, 1992 Edition, with 1992 Addenda requires torque or tension testing on bolted connections that have not been disassembled and reassembled during the inspection interval.

**III. RELIEF REQUESTED:**

Pursuant to 10 CFR 50.55a(a)(3)(ii), relief is requested from the required bolt torque or tension test of the bolted connections as specified in Table IWE-2500-1, Category E-G, Item E8.20, of the 1992 Edition, with 1992 Addenda of ASME Section XI.

**IV. BASIS FOR RELIEF:**

Bolt torque or tension testing is required on all bolted connections that have not been disassembled and reassembled during the inspection interval. Determination of the torque or tension values would require that the bolting be un-torqued and then re-torqued or re-tensioned. The performance of the 10 CFR 50 Appendix J Type B test itself proves that the bolt torque or tension remains adequate to provide a leak rate that is within acceptable limits. The torque or tension value of bolting only becomes an issue if the leak rate becomes excessive. Once a bolt is torqued or tensioned, it is not subject to dynamic loading that could cause it to experience significant change. Verification of torque or tension values on bolted joints that are proven adequate through Appendix J testing and visual inspection is adequate to demonstrate that design function is met. Torque or tension testing is not required on any other ASME Section XI Class 1, 2, or 3 bolted connections or their supports as a part of the Inservice Inspection program.

This examination requirement was deleted from the 1998 edition of ASME Section XI.

Compliance with the specified requirements of this section would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

**V. ALTERNATIVE EXAMINATIONS:**

1. Exposed surfaces of bolted connections shall be visually examined in accordance with the requirements Table IWE-2500-1, Examination Category E-G, Pressure Retaining Bolting, Item No. E8.10.
2. Bolted connections shall meet the pressure test requirements of Table IWE-2500-1, Examination Category E-P, All Pressure Retaining Components, Item E9.40.
3. A general visual examination of the entire containment once each inspection period shall be conducted in accordance with 10 CFR 50.55a(b)(2)(x)(E).

**VI. IMPLEMENTATION SCHEDULE:**

First inspection interval for IWE.

**Relief Request No. 26**

**Relief from Examination Requirements of Containment Building Seals and Gaskets**

**I. COMPONENT IDENTIFICATION:**

ASME Section XI, Class MC, Seals and gaskets of pressure retaining components and metallic liners of Class CC components, Category E-D, Item Numbers E5.10 and E5.20.

**II. EXAMINATION REQUIREMENTS:**

Table IWE-2500-1, Examination Category E-D, of ASME Section XI, 1992 Edition, with 1992 Addenda requires Visual Examination (VT-3) of containment seals and gaskets.

**III. RELIEF REQUESTED:**

Pursuant to 10 CFR 50.55a(a)(3)(ii), relief is requested from the required Visual Examination (VT-3) of the seals and gaskets as specified in Table IWE-2500-1, Category E-D, Items E5.10 and E5.20, of the 1992 Edition, with 1992 Addenda of ASME Section XI.

**IV. BASIS FOR RELIEF:**

Seals and gaskets receive a 10 CFR 50 Appendix J test. As noted in 10 CFR 50 Appendix J, the purpose is to measure leakage of containment or penetrations whose design incorporates resilient seals, gaskets and sealant compounds, and electrical penetrations fitted with flexible metal seal assemblies. Examinations of seals and gaskets require the joints, which are proven adequate through Appendix J testing, to be disassembled. For electrical penetrations, this would involve a pre-maintenance Appendix J test, determination of cables at electrical penetrations if enough slack is not available, disassembly of the joint, removal and examination of the seals and gaskets, re-assembly of the joint, re-termination of the cables if necessary, post maintenance testing of the cables, and a post maintenance Appendix J test of the penetration. The work required for the Containment Hatches would be similar except for the determination, re-termination, and testing of cables. This imposes a risk that equipment could be damaged. The 1992 Edition, 1993 Addenda, of Section XI recognizes that disassembly of joints to perform these examinations is not warranted. Examination Category E-D was modified to state that sealed or gasket connections need not be disassembled solely for performance of examinations. However, without disassembly, most of the surface of the seals and gaskets would be inaccessible.

For those penetrations that are routinely disassembled, a Type B test is required upon final assembly and prior to start-up. Since the Type B test will assure the leak tight integrity of primary containment, the performance of the visual examination would not increase the level of safety or quality.

This examination requirement was deleted from the 1998 Edition of ASME Section XI.

Compliance with the specified requirements of this section would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

**V. ALTERNATIVE EXAMINATIONS:**

The leak tightness of seals and gaskets will be tested in accordance with 10 CFR 50 Appendix J. No additional alternatives to the visual examination, VT-3, of the seals and gaskets will be performed.

**VI. IMPLEMENTATION SCHEDULE:**

First inspection interval for IWE.