May 2, 2001

LICENSEE: Florida Power and Light Company (FPL)

SUMMARY: SUMMARY OF JANUARY 24, 2001, MEETING WITH FPL TO DISCUSS STAFF QUESTIONS AND POTENTIAL REQUESTS FOR ADDITIONAL INFORMATION (RAIs) FOR THE TURKEY POINT UNITS 3 AND 4, LICENSE RENEWAL APPLICATION

On January 24, 2001, representatives of FPL Company met with the Nuclear Regulatory Commission staff to discuss and/or provide clarification on several questions raised by the staff as part of its review of the application. The areas discussed were as follows:

- Section 3.6.2.3 AMR Results - Concrete Structural Components
- Section 3.4 Auxiliary Systems
- Section 2.1 Scoping and Screening Methodology
- Section 2.4 Scoping and Screening Results-Structures
- Section 2.3 Scoping and Screening Results - Systems
- Section 3.2.3 AMR Results - Pressurizers
- Section 3.3.4 and 3.3.5 AMR Results - Safety Injection, RHR Systems
- Section 3.2.5 AMR Results - Reactor Vessel Internals
- Section 3.2.1 AMR Results - Reactor Coolant Piping
- Section 3.2.4 AMR Results - Reactor Pressure Vessels
- Section 3.2.7 AMR Results-Steam Generators

The meeting was useful because it provided the staff with an opportunity to clarify the intent of staff questions. Several of the questions were resolved, while the balance was sent to the applicant as formal requests for additional information (RAIs). There were two bases for resolving staff questions: 1) the information was present in another section of the application; and 2) the question presumed omission based on applicability to the facility, to which the applicant confirmed the applicability of a certain questions. Attached is a list of attendees and also attached is documentation of the questions that were resolved.

/RA/

Rajender Auluck, Senior Project Manager
License Renewal and Standardization Branch
Division of Reactor Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Docket Nos. 50-250 and 50-251

Attachments: As stated

cc w/attachments: See next page

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- Section 3.2.3 AMR Results - Pressurizers
- Section 3.3.4 and 3.3.5 AMR Results - Safety Injection, RHR Systems
- Section 3.2.5 AMR Results - Reactor Vessel Internals
- Section 3.2.1 AMR Results - Reactor Coolant Piping
- Section 3.2.4 AMR Results - Reactor Pressure Vessels
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NRC PUBLIC MEETING ATTENDANCE LIST
MEETING WITH FPL TO DISCUSS POTENTIAL STAFF
QUESTIONS ON THE TURKEY POINT LICENSE RENEWAL APPLICATION
JANUARY 24, 2001

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ANDREA LEE	NRC/NRR/DE/EMCB
BARRY ELLIOT	NRC/NRR/DE/EMCB

Attachment 1

Staff Concerns from Proposed Requests for Additional Information
That Were Resolved at the January 24, 2001, Meeting

(A) Section 3.6.2.3 Concrete Structural Components

(1) The application does not state whether ASME Section XI, Examination Category L-A, will be implemented as part of an aging management program for containment structure concrete components. Discuss the use of this portion of the ASME Code in your aging management programs.

This question was combined with a similar question (RAI 3.9.1.4-1)

(2) Discuss whether the erosion of the porous concrete sub-foundation layer was considered as an applicable aging effect.

This question was rephrased to read: clarify whether the Turkey Point containment have a porous concrete sub-foundation. If so, explain how the reduction in foundation strength from the erosion of porous concrete sub-foundation was considered (RAI 3.6.2.3-2)

(3) The steel liner of concrete containment structures or the steel containment shell, which is embedded in the concrete floor slab, is potentially subject to degradation through corrosion from water on the containment floor seeping through cracks in the concrete floor or degraded joint sealants. Do you have an aging management program to manage this type of corrosion mechanism for inaccessible areas? If yes, then identify the program. If not, then state the basis for not having one.

This was deleted because it is asking the same question as RAI 3.9.1.2-2.

(B) Section 3.4 Auxiliary Systems

(1) The questions related to the boric acid wastage surveillance program for the three systems (Intake cooling water, spent fuel pool cooling, and primary water makeup) were combined as follows.

The boric acid wastage surveillance program provides for visual inspection of external surfaces for evidence of corrosion, cracking leakage, fouling, or coatings damage. For the following systems: the intake cooling water system, the spent fuel pool cooling system, and the primary water makeup system, provide details specific to of the location of the bolts and the most recent operating history supporting the adequacy of this program in managing the loss of mechanical closure for the carbon steel bolts in these systems which are exposed externally to borated water leaks.

(2) The scoping requirements of 10 CFR 54.4(a)(2) include all non-safety-related systems, structures, and components whose failure could prevent satisfactory accomplishment of any of the functions identified in paragraphs 10 CFR 54.4(a)(1)(i), or (iii). In Section 2.1.1.3 of the LRA, the applicant stated that Turkey Point Units 3 and 4 were not originally licensed for "Seismic II over I piping components." However, "Seismic II over I piping components" is considered for license renewal scoping. Clarify whether the scope of the auxiliary systems discussed in Section 3.4 of the LRA includes any "Seismic II over I" piping. In addition, clarify how the aging management programs for those piping systems, including their supports, have been addressed. Specifically, state whether the same aging management programs discussed in tables included in LRA Section 3.4 also apply to those "Seismic II over I" piping components. The NRC staff agreed to review this information in the scoping section of the LRA and revise the question as appropriate.

(3) The staff discussed several questions from Section 3.4 of the application related to intake cooling water, component cooling water, spent fuel cooling, chemical and control volume systems, and primary water system. The applicant provided several cross references where additional information was available. The staff agreed to review those areas and the possibility of combining some questions.

Section 3.4.1 Intake Cooling Water

(1) The periodic surveillance and preventive maintenance program is a current program which will be enhanced with regard to the scope of specific inspections and their documentation. Provide applicable frequencies, bases, and the most recent operating history supporting the adequacy of this program for the following components in the intake cooling water system: stainless steel, carbon steel and cast iron intake cooling water pumps; rubber intake cooling water pump expansion joints; and aluminum-bronze pump discharge valves exposed externally to the raw water environment. For other components in the intake cooling water, this information was provided.

(2) For those structures which are inaccessible for inspection through the systems and structures monitoring program, an inspection of structures with similar materials and environments may be indicative of aging effects. Several components in the intake cooling water system credit this program for managing loss of material in the raw water environment. Provide the applicable frequencies, bases, and the most recent operating history supporting the adequacy of this program for the following components in the intake cooling water system: cast iron, carbon steel, bronze, monel, and stainless steel valves, piping, tubing, and fittings; stainless steel orifices; and stainless steel thermowells, exposed internally to the raw water environments.

Section 3.4.2 Component Cooling Water

(3) Although cracking due to stress corrosion, intergranular stress corrosion, embrittlement, and high-cycle fatigue are applicable aging effects for stainless steel materials exposed internally to the treated water environment, this aging

effect is not identified for any stainless steel component in Table 3.4-2, "Component Cooling Water" of the LRA. Provide the bases for the exclusion of this applicable aging effect for stainless steel components in the component cooling water system.

(4) Pitting and crevice corrosion are potential aging effects for piping flange connections that are part of the auxiliary systems. However, these aging effects were not identified in Section 3.4.2 and Tables 3.4-1 through 3.4-15. The applicant should identify these as potential aging effects with and applicable aging management program or provide justification for their exclusion.

The staff agreed to review the information provided in Section 5.1 of Appendix C of the LRA.

Section 3.4.3 Spent Fuel Pool Cooling

The staff agreed to review the information available in Appendix C of the LRA.

(1) Maintaining chemical impurities within a specified range is not enough to ensure that possible aging effects in components are adequately managed. Provide information on the verification, either through sampling inspection or coupon monitoring, of the effectiveness of this program particularly in areas where stagnant flow conditions exist.

(2) Tables 3.4-1 through 3.4-15 identifies that loss of material in auxiliary systems exposed to treated water will be managed by the chemistry control program. With respect to pitting and crevice corrosion it is recognized that in order for crevice and pitting corrosion to occur a presence of halogens in excess of 150 ppb, oxygen in excess of 100 ppb and stagnant or low flow conditions must be present within the system. However, because of chemical concentration at locations of stagnant or low flow, pitting corrosion could occur at the those locations, even if the halogens and oxygen are below these limits. Provide justification for excluding the loss of material due to crevice corrosion and pitting in stagnant or low flow conditions or identify an AMPs) in addition to the chemistry control program to manage this effect of aging.

(3) Provide the bases for the determination of corrosion rates and for the techniques which will be used in the galvanic corrosion susceptibility inspection program. Although the applicant states that this a proven program, there are no stated bases for these statements. If industry standards are being used, then the standards should be stated. The applicant states that visual examinations and proven techniques have assessed the material condition for other plant systems. The standards which govern these exams and techniques are now going to form the backbone for this program; therefore, the applicant must identify the standards for the staff to evaluate their adequacy for aging management.

Section 3.4.4 Chemical and Volume Control

(1) Aging effects of components exposed to the air/gas environment is dependent, in part, on the type of air/gas environment, the operating temperature, and the water content. Provide the characteristic parameters of the air/gas environments applicable to the components found in the chemical and volume control system. Provide the bases by which the determination of no aging effects requiring management was concluded for all components exposed to the air/gas environment.

(2) Maintaining chemical impurities within a specified range is not enough to ensure that possible aging effects in components are adequately managed. Provide information on the verification, either through sampling inspection or performance monitoring, of the effectiveness of this program particularly in areas where stagnant flow conditions exist.

(3) Provide the bases for the determination of corrosion rates and for the techniques which will be used in the galvanic corrosion susceptibility inspection program. Although the applicant states that this is a proven program, there are no stated bases for these statements. If industry standards are being used, then these should be stated. The applicant states that visual examinations and proven techniques have assessed the material condition for other plant systems. The standards which govern these exams and techniques are now going to form the backbone for this program; therefore, the applicant must identify these standards. (See 3.4.3-Spent Fuel Pool Cooling (3))

(4) Cracking has been identified as a potential aging effect for stainless steel components which have been previously heat-traced. Provide the justification of crediting a sampling program of visual inspections for detecting cracking in these stainless steel components. In addition, provide additional information of the most recent inspection of these stainless steel components, the baseline inspection of these components, if applicable, and the plant history of previously heat-traced components. Visual inspection cannot be used for detecting cracking in stainless steel components previously heat traced.

Section 3.4.5 Primary Water Makeup

(1) Maintaining chemical impurities within a specified range is not enough to ensure that possible aging effects in components are adequately managed. Provide information on the verification, either through sampling inspection or coupon monitoring, of the effectiveness of this program particularly in areas where stagnant flow conditions exist.

(C) Section 2.1 Scoping and Screening Methodology

(1) In Sections D3 and E3 of drawings 3-ICW-01 and 4-ICW-01, the LRA boundaries terminate in the middle of the restricting orifices RO-3-6691, RO-4-6690, and RO-4-669. Provide justification for excluding part of the orifice as being within the scope of license renewal.

This will be deleted because the applicant stated that the orifice is within the scope of license renewal.

(2) In Section A6, C6, and E6 of drawings 3-ICW-02 and 4-ICW-02, the LRA boundaries terminate in the middle of the piping and there is no indication as to what systems that these piping lines are connected to. Provide a discussion of the related systems beyond those termination points and whether they are considered as being within the scope of license renewal.

This will be deleted because the applicant stated that these lines are vent lines and not continuous.

(3) In Section A6 of drawing 3-SI-01, the HHSI pump A thrust bearing cooler piping from CCW is not included in the scope of license renewal. Provide justification for the exclusion of this piping section.

This will be deleted. It is included in the scope of license renewal as indicated by the boundary flange. Optional highlighting of the boundary is missing.

(4) The SFP transfer tube, isolation gates between the reactor building and the SFP, and blind flanges are not included within the scope of license renewal, nor are they identified as part of an AMR. Provide justification for the exclusion of these components.

This will be deleted because these are within the scope of license renewal as indicated on pages 2.4-12, 3.6-53, and 3.6-95 of the application.

(D) Section 2.4.2 <u>Generic</u>

(1) In the License Renewal Application (LRA), the applicant in general, excluded doors and roof openings that may be located within the Containment, Auxiliary Building, Cold Chemistry Lab, Emergency Diesel Generator Buildings, and the Turbine Building from the scope of structural components that are within scope of license renewal. Please provide justification for this exclusion or clarify where these components are addressed with the LRA.

This question will be deleted as the information is already available in Table 3.6.12 of the application.

(2) Various tables (i.e. Table 3.6-5, “Control Building,” and Table 3.6-13, “Intake Structure,”) identify foundations as part of the various component commodity groups of the respective structures that are within the scope of license renewal and subject to AMR. Clarify whether the foundations identified include the various foundation support for safety-related components housed within the respective building or structure.

The applicant stated that the foundation supports are included in the scope of license renewal (see pages 3.6-66, 3-6-67 and 3-6-105). The question will be deleted.

Section 2.4.2.1 Auxiliary Building

(1) Subsections 2.4.2.1, “Auxiliary Building,” and 2.4.2.14, “Spent Fuel Storage and Handling,” in the Turkey Point License Renewal Application (LRA) states ...the auxiliary building is within the scope of license renewal because it houses safety related systems, structures, and components (SSCs). Both sections also state that the fuel handling building structure (consisting of the concrete spent fuel pool and the concrete sliding door) is identified as part of the auxiliary building SSCs and references Table 3.6-3, “Auxiliary Building,” for a complete listing of the structural components, their intended functions, and respective aging management programs. However, is not clear whether Table 3.6-3 identifies the fuel handling building structural components (internal to the auxiliary building) as part of the auxiliary building components that are within the scope of license renewal. Please explain why the fuel handling building structural components are apparently omitted from the list of auxiliary building SSCs or clarify where in the LRA these components are addressed.

The question will be deleted. The applicant stated that these are part of the auxiliary building as provided on page 3.8-96 of the LRA.

Section 2.4.2.14 Spent Fuel Storage and Handling

(1) The LRA states that the spent fuel storage and handling structures includes all the structural components necessary to store spent fuel in the spent fuel pools (SFPs). Furthermore, UFSAR Section 9.5.2, “System Design and Operation,” identifies the Refueling Water Storage Tank (RWST) as one of the major structures that stores and supplies borated water to the refueling canal in support of refueling and fuel handling operations. Provide justification for exclusion of the structural support foundation for the RWST from the structural components that are within the scope of license renewal or clarify where it is addressed in the LRA.

The question will be deleted as the information for structural support is provided on pages 3.3-19 and 3.6-105 of the LRA.

(E) Section 2.3.2.3 Containment Isolation

(1) In LRA Table 3.3-3 for containment purge system, debris screen banding is included for internal environmental aging effect. Please clarify why this component is not included external environmental aging effect.

This will be deleted because the screen and banding are welded together and not exposed to outside environment.

(2) In LRA Section 2.3.2.3 for containment isolation, it is indicated that nitrogen and hydrogen process system containment isolation valves are shown on the drawing 0-N2H2-01 for nitrogen and hydrogen. The above drawing shows nitrogen supply isolation valves for penetration P-42 and P-6 to SIS accumulators and reactor coolant system pressurized relief tank that are within the scope of license

renewal. Please confirm that there are no other nitrogen and hydrogen process system containment isolation valves.

This will be deleted because the drawing 4-CVCS-02 shows that hydrogen lines are outside the scope of license renewal.

Section 2.3.2.6 Emergency Containment Filtration

(1) In LRA Table 3.3-6, emergency containment filtration system contains piping/fittings of copper and valves piping/fittings and tubing /fittings of stainless steel that have an internal environment of air/gas. Please provide additional information that links these components in Table 3.3-6 with the drawing 3/4- ECF-01 for the emergency containment filters.

Based on material present in the LRA. (I.e., copper lines are only internal to filtration unit), this question will be deleted.

(F) Section 3.2.3 Pressurizers

(1) Clarify whether the instrumentation nozzles to the TP pressurizers fall within the scope of license renewal. If the instrumentation nozzles are within the scope of license renewal, given that IGSCC and TGSCC has been detected in two of the corresponding instrumentation nozzles at Surry Unit 1, provide an aging management program for managing IGSCC and TGSCC type degradation in the pressurizer instrumentation nozzles during the proposed operating terms for the units. In addition, state how the instrument nozzles are welded (i.e., clarify welding method, materials and type) to the pressurizer heads or shell. If the instrumentation nozzles are welded to the heads or shells using full penetration welds, the ISI-TGSCC type degradation in the pressurizer instrumentation nozzles should be modified to include appropriate ASME Code Section XI inspection categories and inspection items.

This will be deleted as the instrumentation nozzles fall within the scope of license renewal and are listed on page 3.2-64.

(2) Clarify whether FPL's review of plant-specific operating experience includes pertinent inspection reports, non-conformance reports, licensee event reports, and non-conformance reports from other WOG-member utilities, and any applicable experience from Combustion Engineering Owners Group (CEOG) members and Babcock and Wilcox Owners Group (BWOG) members. If FPL's review of plant-specific operating experience does not include pertinent inspection reports, non-conformance reports, license event reports, and non-conformance reports from other WOG-member utilities, and applicable experience from CEOG and BWOG member plants, either provide a technical basis for not reviewing these sources as part of the FPL review process, or provide a list of additional plant-specific sources that will be reviewed for the licensee renewal evaluation of the TP pressurizers.

Based on the staffs review of the Westinghouse report, this question will be deleted.

(G) Section 3.3.4 and 3.3.5 Safety Injection & RHR Systems

Based on the discussion at the meeting, the staff agreed to review these sections again and revise the list of questions.

(H) Section 3.2.5 Reactor Vessel Internals

(1) In Section 3.2.5, FP&L indicates that the reactor vessel internals (RVI) are within the scope of the license renewal application as discussed in Subsection 2.3.1.6. The staff requests that FP&L include the holddown spring in the Subsection 2.3.1.6 discussion that lists the components that comprise the RVIs, or provide the basis for its exclusion.

This question will be deleted because the holddown spring is within the scope of license renewal as indicated in Table 3.2-1 on page 3.2-78.

(2) The staff requests information and a summary description of FP&L's use of inservice loose-part detection program for the reactor coolant systems at the Turkey Point Units 3 and 4.

Based on discussion at the meeting, the staff agreed to review again the information in the application.

(I) Section 3.2.1 Reactor Coolant Piping

(1) Describe how crack initiation and growth due to stress corrosion cracking will be managed for the cast austenitic stainless steel (CASS) piping components at Turkey Point Units 3 and 4.

This will be deleted as information is available on page 3.2.5 and Table 3.2-1 of the LRA.

(2) What are the ferrite percentages for the CASS components in the piping systems, and are these components determined to be not susceptible or potentially susceptible to thermal aging embrittlement in accordance with the procedure described in the draft safety evaluation for topical report WCAP-14575?

This will be deleted as information is available on pages 3.2-4 and 4.7-3 of the LRA.

(3) Is there any stainless steel Class 1 or non-Class 1 reactor coolant components exposed to an outdoor environment? If so, how will stress corrosion cracking be managed for these components?

This will be deleted as information is provided in Table 3.2.1 of the LRA.

(J) Section 3.2.4 Reactor Vessels

(1) The staff considers that the monitoring pipes from the closure head should be subject to an aging management review (AMR) (see letter from C.I. Grimes to D.J. Firth, dated October 27, 1999). Because the leakage monitoring pipes penetrate the sealing surfaces of the vessel flanges, they should be treated as part of the RCS pressure boundary, and therefore, are within the scope of Part 54. To resolve this issue, the staff requests that the applicant correct the inconsistency with the Code regarding the pressure retaining function of the O-ring and provide an AMR of the monitoring pipes.

This was combined with a similar question the reactor coolant piping area.

(K) Section 3.2.7 Steam Generators

(1) Instrument nozzles that penetrate the primary RCS system in the steam generators are not identified in Table 3.2-1 as components requiring an aging management program. Yet, industry has identified these components as susceptible to primary water stress corrosion cracking. Explain why they were not identified in Table 3.2-1 with a related aging management program.

This will be deleted as at Turkey Point, there are no instrument nozzles that penetrate the primary RCS system.

(2) Multiple NRC generic communications (e.g., NRC Generic Letter 89-08, “Erosion/Corrosion-Induced Pipe Wall Thinning,” NRC IN 91-18, “High-Energy Piping Failures Caused by Wall Thinning”, etc.) provide information on industry operating experience associated with the failure of high-energy piping due to flow accelerated corrosion. However, these generic communications are not referenced by FPL in Section 3.2.7.3.1 of the LRA, and the flow accelerated corrosion AMP is not identified as an applicable aging management program for components potentially affected by flow accelerated corrosion (e.g., feedwater and steam outlet nozzles).

A. Explain why these generic communications were not identified as reference documents.

B. Discuss why the flow accelerated corrosion AMP was not identified as an applicable aging management program for components potentially affected by flow accelerated corrosion.

This will be deleted as the reference documents are identified on pages 3.5-4 through 3.5-6 of the LRA.

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