



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
WASHINGTON, D.C. 20555-0001

August 28, 2012

Mr. Mano Nazar  
Executive Vice President and  
Chief Nuclear Officer  
Florida Power and Light Company  
P.O. Box 14000  
Juno Beach, Florida 33408-0420

**SUBJECT: TURKEY POINT NUCLEAR GENERATING UNIT NOS. 3 AND 4 - CLOSEOUT  
OF REVIEW OF THE ONE-TIME INSPECTION OF CLASS 1 SMALL BORE  
PIPING PROGRAM REVISED COMMITMENT AND INSPECTION PLAN  
(TAC NOS. ME6987 AND ME6988)**

Dear Mr. Nazar:

By letter dated August 16, 2011, Florida Power and Light (FPL), the licensee for Turkey Point Nuclear Generating (TPN), Unit Nos. 3 and 4 submitted "License Renewal One-Time Inspection of Class 1 Small Bore Piping Program Revised Commitment and Inspection Plan Submittal" to inform the U.S. Nuclear Regulatory Commission (NRC) of a revision to a commitment for license renewal and to satisfy a commitment submittal for license renewal. The licensee's commitment is specified in the TPN Unit Nos. 3 and 4 Updated Final Safety Analysis Report (UFSAR). The commitment states, "A volumetric inspection of a sample of small bore Class 1 piping and nozzles will be performed to determine if cracking is an aging effect requiring management during the period of extended operation.... A report describing the details of the inspection plan will be submitted to the NRC prior to the implementation of this inspection."

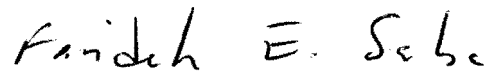
The NRC staff reviewed the information in the licensee's letter and determined that the inspection plan is consistent with the guidance provided in the Generic Aging Lessons Learned Report, Revision 2, and the licensee's change to the commitment does not change the staff's previous conclusion regarding Turkey Point's One-Time Inspection of Class 1 Small Bore Piping Program, as documented in NUREG-1759. The review of the licensee's submittal is summarized in the enclosure to this letter. Therefore, TAC Nos. ME6987 and 6988 that are associated with this review will be closed.

M. Nazar

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If you have any questions regarding this letter, please contact me at (301) 415-1447.

Sincerely,

A handwritten signature in black ink that reads "Farideh E. Saba". The script is cursive and fluid.

Farideh E. Saba, Senior Project Manager  
Plant Licensing Branch II-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-250 and 50-251

Enclosure: As stated

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SUMMARY OF REVIEW OF COMMITMENT FOR LICENSE RENEWAL  
ONE-TIME INSPECTION OF CLASS 1 SMALL BORE PIPING PROGRAM  
TURKEY POINT NUCLEAR GENERATING UNIT NOS. 3 AND 4  
DOCKET NOS. 50-250 AND 50-251

By letter dated August 16, 2011 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML11238A064), Florida Power and Light (FPL), the licensee for Turkey Point Unit Nos 3 and 4, submitted "License Renewal One-Time Inspection of Class 1 Small Bore Piping Program Revised Commitment and Inspection Plan Submittal" to inform the U.S. Nuclear Regulatory Commission (NRC) of a change to a commitment for license renewal, and to satisfy the commitment submittal for license renewal.

The submittal revised a licensee renewal commitment for the one-time inspection of class 1 small bore piping to follow the guidance in the Generic Aging Lessons Learned (GALL) Report, NUREG-1801, Revision 2, Aging Management Program (AMP) XI.M35, "One-Time Inspection of [American Society of Mechanical Engineers] ASME Code Class 1 Small-Bore Piping." The submittal also fulfilled the license renewal commitment to provide the NRC with a report that described the details of the one-time inspection plan for small bore piping.

Background

NUREG-1759, "Safety Evaluation Report Related to the License Renewal of Turkey Point Nuclear Plant, Unit Nos. 3 and 4," dated April 2002, documents the NRC staff's review of the license renewal application. The Turkey Point Unit Nos. 3 and 4 Updated Final Safety Analysis Report (UFSAR) documents the commitments that were made to manage the effects of aging during the period of extended operation. The subject commitment is located in Section 16.1.7 of the UFSAR. The commitment states:

A volumetric inspection of a sample of small bore Class 1 piping and nozzles will be performed to determine if cracking is an aging effect requiring management during the period of extended operation. This one-time inspection will address Class 1 piping less than 4 inches in diameter. Based on the results of these inspections, the need for additional inspections or programmatic corrective actions will be established. The inspection will be performed prior to the end of the initial operating license terms for Turkey Point Unit Nos. 3 and 4. A report describing the details of the inspection plan will be submitted to the NRC prior to the implementation of this inspection.

The licensee provided the following revised commitment, in part, in Attachment 1 of its submittal:

A volumetric inspection of a sample of small bore Class 1 piping and nozzles will be performed to determine if cracking is an aging effect requiring management

Enclosure

during the period of extended operation. If an acceptable volumetric technique is not available to perform a volumetric inspection for socket welds, a destructive examination may be performed. 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.

In addition, Turkey Point Unit Nos. 3 and 4 UFSAR, Section 16.1.7, Small Bore Piping Inspection, states that a report describing the details of the one-time inspection plan will be submitted to the NRC prior to the implementation of this inspection. To comply with the UFSAR Section 16.1.7 requirements, FPL provided in Attachment 2 of its submittal the one-time Class 1 Small Bore Piping Program Inspection Plan for Turkey Point Unit Nos. 3 and 4. The licensee stated that the inspection plan follows the guidance provided in the GALL Report, NUREG-1801, Rev 2, Section AMP XI.M35, "One-Time Inspection of ASME Code Class 1 Small-Bore Piping."

#### NRC Staff Review

The NRC staff performed a review of the revised commitment and the licensee's inspection plan.

#### Program applicability

The licensee will use a one-time program instead of a periodic inspection program. Since there have been no failures in its Class 1 small-bore piping based on the applicant's plant-specific operating experience, the one-time program is applicable according to the recommendation of the GALL Report AMP XI.M35.

#### Schedule

The licensee indicated that the inspection will be performed within six years prior to entering the period of extended operation. This is consistent with the timely inspection guidance provided in the GALL Report AMP XI.M35.

#### Program scope

The licensee stated that the program scope includes ASME Code Class 1 small bore piping, less than 4 inches but greater than or equal to 1 inch nominal pipe size (NPS). This is consistent with the program scope guidance provided in the GALL Report AMP XI.M35.

#### Sample selection methodology

The licensee indicated that it will use the risk-informed in-service inspection program for the small bore piping sample selection. This is consistent with the inspection sample selection guidance provided in the GALL Report AMP XI.M35.

#### Inspection sample size

The licensee indicated that the sample size is at least 3 percent and up to 10 welds for each weld type (full penetration welds and socket welds). This is consistent with the inspection sampling guidance provided in the GALL Report AMP XI.M35.

#### Examination methodology

The licensee indicated that the examination will be volumetric for full penetration welds. This is consistent with the GALL Report AMP XI.M35 guidance regarding the examination of full penetration welds. For socket welds, the licensee indicated that the examination will be either volumetric or destructive. The NRC staff guidance for socket weld examination allows volumetric or destructive or a combination of both. Therefore, the proposed examination methodology is consistent with the GALL Report AMP XI.M35 guidance regarding the examination methodology. The licensee also indicated that, for socket weld examination, it has an option of performing destructive examination in lieu of volumetric examination on a two-for-one basis. This is consistent with the sampling guidance specified in the GALL Report AMP XI.M35.

#### Conclusion

Based on its review of the revised commitment for license renewal, the NRC staff concludes that the licensee's change to the commitment does not change the staff's previous conclusion regarding Turkey Point's One-Time Inspection of Class 1 Small Bore Piping Program, as documented in NUREG-1759.

Based on its review of the one-time Class 1 Small Bore Piping Program inspection plan, the NRC staff also concludes that the inspection plan is consistent with the guidance provided in AMP XI.M35 of the GALL Report, Revision 2.

M. Nazar

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If you have any questions regarding this letter, please contact me at (301) 415-1447.

Sincerely,

/ra/

Farideh E. Saba, Senior Project Manager  
Plant Licensing Branch II-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-250 and 50-251

Enclosure: As stated

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