

## NRR-PMDAPEm Resource

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**From:** Klett, Audrey  
**Sent:** Thursday, June 04, 2015 8:57 AM  
**To:** Mihalakea, Stavroula; 'Hanek, Olga' (Olga.Hanek@fpl.com); Mitch.Guth@fpl.com  
**Subject:** Request for Additional Information re. Turkey Point Unit 3 and 4 Relief Request No. 15 (TAC Nos. MF5794 and MF5795)

Hi Mitch, Olga, Stavy,

By letter dated February 13, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession Number ML15062A279), Florida Power & Light Company (FPL, the licensee) submitted Relief Request No. 15 for the Fourth Inservice Inspection (ISI) Interval for Turkey Point Nuclear Generating Unit Nos. 3 and 4 (Turkey Point 3 and 4). Pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Paragraph 50.55a(g)(5)(iii), the licensee is seeking relief from the volumetric examination coverage requirements of Section XI of the American Society of Mechanical Engineers Code (ASME Code, Section XI).

The U.S. Nuclear Regulatory Commission (NRC) staff reviewed Relief Request No. 15 and identified areas where it needs additional information and clarification to complete its review and to determine whether the NRC can grant relief pursuant to 10 CFR 50.55a(g)(5)(iii). The Request for Additional Information (RAI) is provided below. As discussed with Ms. Stavy Mihalakea of the licensee's staff on June 2, 2015, the NRC requests the licensee to respond to the RAI on or by July 10, 2015.

### RAI 1

- a. On page 2 of Relief Request No. 15 (Attachment 1), the description for Examination Category B-A, Item B1.11 for the Reactor Pressure Vessel (RPV) Lower Shell to Lower Head Ring Weld (i.e., Weld 3-WR-31 for Unit 3 and Weld 4-WR-31 for Unit 4) states, "Figure 2 and 3 provides an illustration of the weld volume limitation due to the instrumentation tubes." It is further stated that, "The examination of the Figure IWB-2500-1 A-B-C-D volume is limited due to the proximity of the instrumentation tubes." However, Figures 2 and 3 of Relief Request No. 15 show limitations caused by the Core Support Lugs (or Core Guide Lugs). Clarify the limitations associated with the examinations for Welds 3-WR-31 and 4-WR-31 for Turkey Point 3 and 4. Also, clarify whether the Core Support Lugs are the same as the Core Guide Lugs.
- b. With respect to Figure 2 for Category B-A, Item B1.11, Lower Shell to Lower Head Ring Welds (Weld 3-WR-31 for Unit 3 and 4-WR-31 for Unit 4), provide the following information in a diagram showing: (1) the ASME Code, Section XI required examination volume, (2) the scan angles and axial distances of the search units from the welds used for the examination, and (3) the actual scanned volumes for both the axial and circumferential scan directions. Please refer to the industry/NRC information exchange public meeting held on January 13 -15, 2015 (ADAMS Accession Number ML15013A266), for a discussion of the NRC staff's expectations for the content of an inspection diagram (see Slide 12 for an example).
- c. With respect to Figure 5 for Category B-A, Item B1.30, Upper Shell to Flange Welds (Weld 3-WR-18 for Unit 3 and 4-WR-18 for Unit 4), provide the following information in a diagram showing: (1) the ASME Code, Section XI required examination volume, (2) the scan angles and axial distances of the search units from the welds used for the examination, and (3) the actual scanned volumes for both the axial and circumferential scan directions. Please refer to the industry/NRC information exchange public meeting held on January 13 -15, 2015 (ADAMS Accession Number ML15013A266), for a discussion of the NRC staff's expectations for the content of an inspection diagram (see Slide 12 for an example).

## **RAI 2**

- a. For the four subsurface fabrication flaws found in Examination Category B-A, Item B1.11, RPV Lower Shell to Lower Head Ring Weld No. 4-WR-31 for Unit 4, indicate whether the acceptance criteria in ASME Code, Section XI, Table IWB-3510-1, "Allowable Planar Flaws," were met.
- b. For the three subsurface fabrication flaws found in Examination Category B-A, Item B1.30, RPV Upper Shell-to-Flange Weld No. 3-WR-18 for Unit 3, and the twelve subsurface fabrication flaws found in Examination Category B-A, Item B1.30, RPV Upper Shell-to-Flange Weld No. 4-WR-18 for Unit 4, indicate whether the acceptance criteria in ASME Code, Section XI, Table IWB-3510-1, "Allowable Planar Flaws," were met.

## **RAI 3**

Confirm whether the licensee requested relief for the third ISI intervals for Turkey Point 3 and 4 from essentially 100 percent inspection coverage for Examination Category B-A, Item B1.11, RPV Lower Shell to Lower Head Ring Welds for either Units 3 or 4, given that the design configurations for these welds have not changed since the third ISI interval. If relief requests were not previously submitted, explain why.

## **RAI 4**

With respect to the subsurface indications detected in Welds 3-WR-18 and 4-WR-18 that were identified as fabrication-related defects during the fourth ISI interval examinations, explain why similar indications were not recorded during the previous (third) ISI interval.

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