



JUN 08 2015

L-2015-101  
10 CFR 50.55a

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

RE: Florida Power and Light Company  
Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Fifth Ten-Year Inservice Inspection (ISI) Interval Relief Request No. 3

Pursuant to 10 CFR 50.55a(z)(1), Florida Power & Light Company (FPL) requests approval of the attached Relief Request 3 for the Fifth Ten-Year Inservice Inspection (ISI) Interval Program for Turkey Points Units 3 and 4. The American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Rules for Inservice Inspection of Nuclear Power Plant Components, Section XI, 2007 Edition with Addenda through 2008 as amended by 10CFR50.55a, is the code of record for the Turkey Point units 3 and 4, 5th 10-year interval.

FPL proposes to perform the visual examination of snubbers and associated attachment hardware (pin-to-pipe and pin-to-structure, excluding integral attachments) per the Snubber Program, which is in accordance with the ASME OM Code Subsection ISTD. Details are discussed in the attached Relief Request No. 3.

FPL has determined that the use of the proposed alternative provides an acceptable level of quality and safety.

If you have any questions or require additional information, please contact Mr. Mitch Guth, Licensing Manager, at (305) 246-6698.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael Kiley', is written over a horizontal line.

Michael Kiley  
Site Vice President  
Turkey Point Nuclear Plant

Attachment

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

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NRR

L-2015-101

ATTACHMENT

TURKEY POINT UNITS 3 AND 4

FIFTH TEN-YEAR ISI INTERVAL

RELIEF REQUEST No. 3

**TURKEY POINT UNITS 3 & 4  
FIFTH INSERVICE INSPECTION INTERVAL  
RELIEF REQUEST NUMBER 3**

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**ALTERNATIVE EXAMINATION OF SNUBBER ATTACHMENT HARDWARE**

**Proposed Alternative  
In Accordance with 10CFR50.55a(z)(1)**

**--Alternative Provides Acceptable Level of Quality and Safety--**

**1. ASME Code Component(s) Affected**

ASME Code Classes: Code Classes 1, 2 and 3

References: ASME Section XI, IWF-1220  
ASME Section XI, IWF-1300 and Figure IWF-1300-1(f)  
ASME Section XI, IWF-2500 and Table IWF-2500-1  
ASME OM Code, Subsection ISTD

Examination Category: F-A

Item Numbers: F1.10, F1.20, F1.30 and F1.40

Description: Visual Examination of Snubber Attachment Hardware (Pin-to-Pipe and Pin-to-Structure), Excluding Integral Attachments

Components: Code Class 1, 2 and 3 Snubbers

**2. Applicable Code Edition and Addenda**

Inservice inspections (ISI) of snubber attachment hardware (pin-to-pipe and pin-to-structure) are performed per the requirements of the ASME Boiler and Pressure Vessel Code Section XI, 2007 Edition with 2008 Addenda as required by 10CFR50.55a. Snubber examination and testing (pin-to-pin) is performed in accordance with the ASME OM Code, Subsection ISTD, 2004 Edition with Addenda through 2006 as required by 10CFR50.55a(b)(3)(v)(B).

**3. Applicable Code Requirements**

The examination requirements for supports and associated attachment hardware are specified in ASME Section XI, IWF-2500. Table IWF-2500-1, Examination Category F-A requires that visual, VT-3, examinations be performed on Class 1, 2 and 3 piping and component supports.

The examination and testing of snubbers is governed by ASME OM Code, Subsection ISTD in accordance with ASME Section XI, IWF-1220 and 10CFR50.55a(b)(3)(v)(B).

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When determining the boundaries for support examinations, IWF-1300(g) states,

*"All integral and nonintegral connections within the boundary governed by IWF rules and requirements are included."*

This text establishes that the snubber attachment hardware is included in the examination boundary. The interface boundaries for the examination of snubbers and snubber attachment hardware is further addressed in IWF-1300(h) which states,

*"The examination boundary of a support containing a snubber shall not include the connection to the snubber assembly (pins)."*

These boundaries are shown graphically in Figure IWF-1300-1(f).

**4. Reason for Request**

Turkey Point Units 3 & 4 are required to perform VT-3 visual examinations on Class 1, 2 and 3 supports including attachment hardware per ASME Section XI. Turkey Point Units 3 & 4 are also required to perform visual examinations and testing on snubber assemblies in accordance with ASME OM Code, Subsection ISTD in accordance with IWF-1220 and 10CFR50.55a(b)(3)(v)(B).

In order to perform snubber examination and testing and visual VT-3 of snubber attachment hardware more efficiently, FPL has consolidated the Section XI and OM Code requirements in the plant Snubber Program. The visual examination of snubbers is included in Surveillance Procedure No. 0-OSP-105.1, "Visual Inspection, Removal and Reinstallation of Mechanical Shock Arrestors." This procedure incorporates the majority of Section XI, Subsection IWF requirements included in Articles IWF-1000, IWF-2000, and IWF-3000 with the following exceptions for snubber attachment hardware:

- **IWF-2410, Inspection Program** - FPL will follow the applicable OM Code requirements for snubber examination completion and crediting.
- **IWF-2420, Successive Inspections** - FPL will follow the applicable OM Code requirements for Successive Inspections.
- **IWF-2510, Supports Selected For Examination** - FPL will follow the applicable OM Code requirements for selection of snubbers for examination. Note that based on the applicable OM Code requirements, Turkey Point will perform visual examinations of 100% of the non-exempt Code Class 1, 2 and 3 snubbers in accordance with the visual inspection frequency required per the ASME OM Code.
- **Table IWF-2510-1, Examination Category F-A Supports** - FPL will follow the applicable OM Code requirements for selection of snubbers for examination in lieu of the Table IWF-2510-1, Note 1-4 requirements. As previously noted, Turkey Point will perform visual examinations in accordance with the frequency required per ASME OM Code requirements, which eliminates the need to apply the sampling and selection requirements in Table IWF-2500-1, Notes 1-4.

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FPL will continue to follow the examination requirements for snubber attachment hardware in Articles IWF-1000 and IWF-3000 as well as the VT-3, Visual examination requirements in Table IWF-2510-1 and IWA-2213, except as noted above.

Having separate programs for the visual examination of the attachment hardware and the pin-to-pin portion of snubbers, it would require implementation of similar programmatic requirements in the Turkey Point Section XI and the OM Code Snubber Programs. As a result, FPL would be performing redundant examinations and program implementation. This approach is inefficient and may also potentially cause an increase in occupational radiation exposure. Separate program implementation may also introduce unnecessary confusion in the sample selection, data collection, and documentation of these snubber examinations.

**5. Proposed Alternative and Basis for Use**

Proposed Alternative

FPL is proposing that a single program, the Turkey Point snubber program, maintains the schedule of the examination of snubbers and the associated attachment hardware. FPL will perform the visual examination of snubbers concurrently with the associated attachment hardware (pin-to-pipe and pin-to-structure, excluding integral attachments) per the Snubber Surveillance Procedure, 0-OSP-105.1, "Visual Inspection, Removal and Reinstallation of Mechanical Shock Arrestors." Attributes required by both IWF and the ASME OM, ISTD sections, are included on the examination data sheets and the drawings associated with the complete support assembly are provided for each examination. Examinations are performed by VT-3 certified personnel in accordance with ASME Section XI, IWA-2300. Findings identified during examinations that fail to meet specified criteria from IWF and ISTD are entered into the corrective action program. Findings associated with the snubber from pin to pin inclusively are evaluated in accordance with ASME OM Code. Findings between the pin to structure and the pin to pipe are evaluated in accordance with ASME Section XI IWF. FPL will review the snubber program procedure 0-OSP-105.1 and incorporate changes necessary to ensure compliance with ASME Section XI, IWA & IWF requirements.

Program administration and tracking will be performed in accordance with the snubber program and ASME OM Code Subsection ISTD. The examination frequency required for the snubbers per the ASME OM Code Subsection ISTD will be applied to the balance of support hardware. The ASME OM Code frequency of examination requires a minimum inspection frequency of 100% per 10 Years which exceeds the requirement for ASME Section XI.

The examination of integral attachments will be performed in accordance with ASME Section XI, Table IWB-2500-1 (Examination Category B-K), Table IWC-2500-1 (Examination Category C-C) and Table IWD-2500-1 (Examination Category D-A).

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**Basis for Use**

Pursuant to 10CFR50.55a(z)(1), use of this alternative is requested on the basis that the proposed alternative provides an acceptable level of quality and safety.

The examination and testing requirements for snubbers are documented in Turkey Point Quality Operations Surveillance Procedure No. 0-OSP-105.1, "Visual Inspection, Removal and Reinstallation of Mechanical Shock Arrestors." This procedure requires an examination frequency that establishes a high level of confidence in the acceptability of the plant's snubbers. In addition, this procedure requires the visual examination of snubber attachments, support attachments and attachments to the supporting foundation, including nuts, bolts, studs, welds, pins spacers and embedment.

The visual examination criteria established in Operations Surveillance Procedure No. 0-OSP-105.1 meets or exceeds the examination criteria specified in ASME Section XI, Table IWF-2500-1.

Performing both the ASME Section XI and Snubber Program examinations would be redundant and would not improve the level of quality and safety in the plant. However, it could increase the occupational radiation exposure and cause the unnecessary repetition of activities.

The examinations on integral attachments that are associated with snubber attachment hardware are not included in the scope of this request for relief. The examination of these items will continue in accordance with ASME Section XI.

**6. Duration of Proposed Alternative**

FPL will implement the alternative requirements during the Fifth Inservice Inspection Interval. Turkey Point Unit 3 begins on February 22, 2014 and is scheduled to end on February 21, 2024. Turkey Point Unit 4 begins on April 15, 2014 and is scheduled to end on April 14, 2024.

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**7. Precedents**

The NRC has approved similar requests for alternatives at a number of nuclear facilities, including the following:

- Relief Request No. IR-3-01 was approved for the Millstone Power Station, Unit 3 in a letter from the NRC dated April 6, 2010, ADAMS Accession No. ML100680118.
- Relief Request No. IR-3-03 was approved for the Callaway Energy Center in a letter from the NRC dated March 7, 2006, ADAMS Accession No. ML060580568.
- Relief Request No. RR-III-01 was approved for the V. C. Summer Nuclear Station in a letter from the NRC dated May 10, 2005, ADAMS Accession No. ML051290198.
- Relief Request No. 03-002 was approved for the McGuire Nuclear Station, Unit 2 in a letter from the NRC dated November 22, 2004, ADAMS Accession No. ML043080435.

**8. Attachments to the Request**

None