

## NRR-PMDAPEm Resource

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**From:** Klett, Audrey  
**Sent:** Tuesday, October 18, 2016 9:18 AM  
**To:** 'Mitch.Guth@fpl.com'  
**Cc:** Czaya, Paul (Paul.Czaya@fpl.com); 'Hanek, Olga' (Olga.Hanek@fpl.com)  
**Subject:** Turkey Point 3 and 4 RAI for LAR 242 Snubber TSs (CACs MF7557/58)

Hi Mitch,

By letter L-2016-055 dated April 4, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16110A266), Florida Power & Light Company (FPL, the licensee) submitted License Amendment Request (LAR) 242 for Turkey Point Nuclear Generating Unit Nos. 3 and 4 (Turkey Point 3 and 4). The licensee requested to revise the Technical Specifications (TSs) for snubbers to conform to the licensee's Snubber Testing Program. By electronic mail dated August 11, 2016 (ADAMS Accession No. ML16228A004), the U.S. Nuclear Regulatory Commission (NRC) staff requested additional information to complete its review of the LAR. By letter dated September 1, 2016 (ADAMS Accession Number ML16260A399), the licensee responded to the request. After reviewing the licensee's response, the staff determined that it needs additional information to complete its review. The staff's request for additional information (RAI) is as follows, continued sequentially from the RAI in the email dated August 11, 2016. As discussed with Mr. Paul Czaya of the licensee's staff, the NRC staff is requesting the licensee to respond to the RAI on or by November 14, 2016.

### RAI 7

In its application dated April 4, 2016, the licensee requested, in part, the following changes to Surveillance Requirement (SR) 4.7.6:

- 4.7.6 Each snubber shall be demonstrated OPERABLE by performance of the ~~following augmented inservice inspection~~ **Snubber Testing Program in Specification 6.8.4.m** in addition to the requirements of Specification 4.0.5.

In its RAI dated August 11, 2016, the NRC requested (via RAI 3) the licensee to clarify the use of TS 4.0.5 along with newly added TS 6.8.4.m and to confirm whether these TSs are duplicative and/or if TS 6.8.4.m encompasses all requirements of TS 4.0.5. In its letter dated September 1, 2016, the licensee responded to RAI 3 stating that TS 6.8.4.m and TS 4.0.5 are duplicative with respect to snubbers and that the licensee has proposed to delete reference to TS 4.0.5 in TS 4.7.6 via a separate license amendment application.

In Attachment 3 to its application dated April 4, 2016, the licensee provided the Turkey Point Nuclear Plant Unit 3 and 4 Snubber Testing Program Plan, which is based on the ASME OM Code 2004 Edition with 2005 and 2006 Addenda. In TS 4.0.5, the ASME OM Code is only used for inservice testing of pumps and valves; it is not applicable to snubbers. Therefore, TS 6.8.4.m and TS 4.0.5 do not appear to be duplicative with respect to snubbers, and the "in addition to the requirements of Specification 4.0.5" no longer appears to be applicable to this SR. The staff requests the licensee to revise the application by proposing to delete "in addition to the requirements of Specification 4.0.5," or to provide additional justification for retaining this phrasing in Specification 4.7.6.

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