

TURKEY POINT PLANT
UNIT NO. 3

INSERVICE INSPECTION PLAN

FLORIDA POWER & LIGHT COMPANY
MIAMI, FLORIDA

AUGUST 14, 1979

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REVISION RECORD

This page is a record of all revisions made to the Inspection Plan.

- o Revisions are denoted by vertical line(s), with the revision number above the line(s), and adjacent to the applicable change(s) on each page affected.

<u>Revision No.</u>	<u>Date</u>	<u>Reason (ref. document, where applicable)</u>
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INSERVICE INSPECTION PLAN

TURKEY POINT, UNIT 3

TABLE OF CONTENTS

<u>Section</u>	<u>Title</u>	<u>Page No.</u>
	INTRODUCTION	1
1.0	APPLICABLE EDITIONS AND ADDENDA OF SECTION XI	2
2.0	SYSTEM BOUNDARIES SUBJECT TO INSERVICE INSPECTION	3
3.0	COMPONENTS SUBJECT TO NONDESTRUCTIVE EXAMINATION	4
4.0	INSPECTION SCHEDULE	5
5.0	EXTENT AND FREQUENCY	6
6.0	EXAMINATION METHODS	7
7.0	EVALUATION OF EXAMINATION RESULTS	9
8.0	REPAIR REQUIREMENTS	10
9.0	SYSTEM PRESSURE TESTS	11
10.0	RECORDS AND REPORTS	12
11.0	RELIEF REQUESTS	13
TABLE 1.1	ASME CLASS 1	
TABLE 2.1	ASME CLASS 2	
TABLE 3.1	ASME CLASS 3	
APPENDIX A	RELIEF REQUEST BASIS	

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INTRODUCTION

This Inspection Plan describes Turkey Point Plant's Unit 3 Inservice Inspection Program for the 40 month period commencing August 14, 1979 and ending December 14, 1982. Prior to the beginning of the second 10-year inspection interval, it is anticipated that this Inspection Plan will be revised to incorporate later versions of ASME, Section XI than those currently in effect.

This Plan, which consists of ASME Class 1, 2 and 3 systems and components (and their supports), was developed by giving due consideration to the following documents:

- o 10CFR50.55(a)
- o Section XI of the ASME Code
- o Section III of the ASME Code
- o Section V of the ASME Code
- o USNRC Regulatory Guides
 - Regulatory Guide 1.26, Revision 2
 - Regulatory Guide 1.14, Revision 1
- o Turkey Point Plant FSAR

This Plan does not address examination requirements of steam generator tubing or augmented inspection programs.

Trial	Control	MCI	AD	DLB
1	95	85	75	65
2	95	85	75	65
3	95	80	70	60
4	95	78	68	58
5	95	75	65	55

1. The first step in the process of the investigation is the identification of the problem. This is done by the investigator, who is usually a member of the research team. The investigator will identify the problem by looking at the data and trying to find out what is going on.

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Figure 1. The building of the Ministry of Education and Science of the Republic of Kazakhstan.

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1.0 APPLICABLE EDITIONS AND ADDENDA OF SECTION XI

Pursuant to Title 10 of the Code of Federal Regulations, Part 50, Paragraph 50.55(a), the Inservice Inspection requirements applicable to nondestructive examination and system pressure testing at Turkey Point Plant, Unit 3, are based on the rules set forth in the 1974 Edition of ASME Section XI through Summer 1975 Addenda, hereinafter referred to as ASME Section XI.

As permitted by Paragraph 50.2(v) and 50.55a(g)(4), FPL elects, for certain components, to meet supplemental requirements as set forth in the Edition and Addenda of the Code which have become effective subsequent to the 1974 Edition through the Summer 1975 Addenda of ASME Section XI. Other editions and addenda of ASME Section XI that are adopted are identified in the appropriate sections of this Inservice Inspection Plan. It is the intent of FPL to continually apply appropriate changes in the Code which improve the overall quality of Turkey Point Plant's Inservice Inspection Program.

Figure 1. The effect of the concentration of the *Agrobacterium* suspension on the transformation efficiency of *Agrobacterium* strains. The number of transformed cells was determined by the number of colonies obtained on the selective medium. The results are the mean of three independent experiments. Error bars represent the standard deviation.

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1. *Pharmaceutical industry*—United States—History. I. Title. II. Series.

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2.0 SYSTEM BOUNDARIES SUBJECT TO INSERVICE INSPECTION

The development of the Inservice Inspection Program for Turkey Point Plant, Unit 3 required identification of all ASME Class 1, 2 and 3 pressure-retaining components (and their supports) that are subject to examination by IWA-1300 and within the scope of IWA-1100 of ASME Section XI.

The rules of IWA-1100 are presently only applicable to systems containing water, steam, or radioactive materials in light-water cooled nuclear power plants. Turkey Point Plant's Unit 3, Inservice Inspection Program proposes to adhere to the scope limitations of IWA-1100 until appropriate Code rules are developed for systems containing other fluids.

The pressure retaining component classes conform to the classification requirements specified in 10CFR50.2(v) for the reactor coolant pressure boundary and to the guidelines of USNRC Regulatory Guide 1.26 "Quality Group Classifications and Standards for Water, Steam and Radioactive Waste Containing Components of Nuclear Power Plants," for other safety-related systems.

The classification and identification of the components and system boundaries are shown on the plant's piping and instrumentation diagrams (P&ID's). These classification boundaries were developed for the sole purpose of planning, developing, and implementing Turkey Point Plant's Unit 3 Inservice Inspection requirements; and, as such, are limited in use to those examination and testing activities associated with Section XI of the ASME Code. These classifications and identifications correspond with NRC group classification and ASME classes as follows:

| <u>NRC Quality
Group Classification</u> | <u>ASME Code
Class</u> |
|---|----------------------------|
| A | 1 |
| B | 2 |
| C | 3 |

The following color code on Turkey Point Plant's P&ID's delineates the boundaries of each system whose pressure-retaining components are subject to an inservice examination:

| <u>Color</u> | <u>ASME Code Class</u> |
|--------------|------------------------|
| Red | Class 1 Components |
| Blue | Class 2 Components |
| Green | Class 3 Components |

3.0 COMPONENTS SUBJECT TO NONDESTRUCTIVE EXAMINATION

Turkey Point Plant's P&ID's delineate those pressure-retaining components (and their supports) which are subject to the nondestructive examinations required by IWB-2000, IWC-2000, and IWD-2000 of ASME Section XI by means of the color coding specified in Section 2.0 above.

3.1 ASME CLASS 1 COMPONENTS

Class 1 Table of this Plan identifies the examination requirements of Table IWB-2600 of ASME Section XI. These requirements will be applied to those components identified by the color red on Turkey Point Plant's referenced P&ID's.

3.2 ASME CLASS 2 COMPONENTS

Class 2 Table of this Plan identifies the examination requirements of Table IWC-2600 of ASME Section XI. These requirements will be applied to those components identified by the color blue on Turkey Point Plant's referenced P&ID's.

3.3 ASME CLASS 3 COMPONENTS

Class 3 Table of this Plan identifies the examination requirements of Subsection IWD of ASME Section XI. These requirements will be applied to the appropriate components identified by the color green on Turkey Point Plant's referenced P&ID's.

3.4 REACTOR COOLANT PUMP FLYWHEEL

3.4.1 The Inservice Inspection Program for a reactor coolant pump flywheel examination was developed to meet the guidance of USNRC Regulatory Guide 1.14, "Reactor Coolant Pump Flywheel Integrity". At the intervals suggested, the reactor coolant pump flywheel will be examined and evaluated to the specified acceptance criteria.

4.0 INSPECTION SCHEDULE

- 4.1 The Inspection Interval shall comply with the Inspection Program B, as defined in IWA-2420.
- 4.2 The Inservice Inspection Interval for ASME Class 1 components constitutes a ten year interval of service, commencing December 14, 1972. This Inspection Plan defines the Inservice Inspection requirements for the Third Period of that Interval for ASME Class 1, 2 and 3 components (and their supports).
- 4.3 Turkey Point Plant, Unit 3 will be implementing ASME Class 2 and 3 examination requirements for the first time in accordance with this Inspection Plan. For the remainder of the current ten year Inspection Interval, the percentage of the required examinations completed shall only be those which would have been scheduled had Class 2 and 3 requirements been implemented at the beginning of the interval and the required examinations divided evenly among each of the three Periods.
- 4.4 As permitted by IWA-2400 of ASME Section XI, the Inservice Inspection Interval for ASME Class 1, 2 and 3 components (and their supports) may be extended as necessary, to compensate for any prolonged out-of-service circumstances of the plant.
- 4.5 The Inservice Inspection Interval for the reactor coolant pump flywheel shall be a ten year interval of service commencing on December 14, 1972. For areas of high stress concentration at the bore and keyways, a reduced interval of approximately three years shall be applied. The ten year Examination Plan shall describe the distribution of examinations within the Inspection Interval in accordance with the requirements of USNRC Regulatory Guide 1.14.

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5.0 EXTENT AND FREQUENCY

- 5.1 ASME Class 1, 2 and 3 components and systems (and their supports), as listed in the Class 1, Class 2 and Class 3 Tables respectively, shall be examined to the extent and frequency as required in Table IWB-2500, Table IWC-2500 and Article IWD-2000.

1. The first group of people who are interested in the results of the study are the researchers themselves. They want to know if the study was successful in achieving its objectives and if the results are consistent with their expectations.

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6.0 EXAMINATION METHODS

6.1 ASME Class 1, 2 and 3 components and systems (and their supports) shall be examined by the required visual, surface or volumetric methods. These examinations shall include one or a combination of the following techniques: visual, liquid penetrant, magnetic particle, ultrasonic or radiographic examination. These methods, shall as a minimum, be in accordance with the rules of IWA-2000 of ASME Section XI. Alternate examination methods, a combination of methods, or newly developed techniques, may be substituted as permitted in IWA-2240.

6.2 VOLUMETRIC EXAMINATIONS

6.2.1 Ultrasonic Examinations

6.2.1.1 For ferritic vessels with wall thickness of 2-1/2 inches or greater, an ultrasonic examination shall be conducted in accordance with the rules of Appendix I of ASME Section XI.

6.2.1.2 For ferritic piping systems, an ultrasonic examination shall be conducted in accordance with the rules of Appendix III of later Edition and Addenda of ASME Section XI.

6.2.1.3 For components other than those listed in 6.2.1.1 and 6.2.1.2, an ultrasonic examination shall be conducted in accordance with the rules of Article 5 of ASME Section V.

6.2.1.4 All indications which produce a response greater than 50% of the reference level shall be recorded.

6.2.1.5 All indications which produce a response greater than 100% of the reference level shall be investigated to the extent that the operator can evaluate the shape, identity, and location of all such reflectors in terms of the acceptance/rejection standards of IWA-3100 (b) of ASME Section XI. The length of reflectors shall be measured between points which give amplitudes equal to 100% of the reference level.

6.2.2 Radiographic Examination

6.2.2.1 Radiographic examinations shall be conducted in accordance with Article 2 of ASME Section V.

[The page contains extremely faint, illegible text, likely bleed-through from the reverse side. The text is organized into several paragraphs, with some lines appearing as distinct blocks of text. Due to the low contrast, specific words and sentences cannot be transcribed.]

6.3 SURFACE EXAMINATION

6.3.1 Liquid Penetrant Examination

6.3.1.1 Liquid penetrant examinations shall be conducted in accordance with Article 6 of ASME Section V.

6.3.2 Magnetic Particle Examination

6.3.2.1 Magnetic particle examinations shall be conducted in accordance with Article 7 of ASME Section V.

6.4 VISUAL EXAMINATION

6.4.1 Visual examination shall be conducted in accordance with the requirements of IWA-2210 of the later Edition of Section XI.

6.5 REACTOR COOLANT PUMP FLYWHEEL

6.5.1 Reactor coolant pump flywheels shall be examined by the required surface and volumetric methods, in accordance with the requirements of IWA-2200 of ASME Section XI.

MEMORANDUM

TO : THE DIRECTOR

FROM : THE ASSISTANT ATTORNEY GENERAL

SUBJECT: [Illegible]

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7.0 EVALUATION OF EXAMINATION RESULTS

- 7.1 The evaluation of nondestructive examination results for ASME Class 1, 2 and 3 components (and their supports) shall be in accordance with Article IWB-3000, IWC-3000 and IWD-3000, respectively.

If acceptance standards for a particular Component, Examination Category, or Examination Method are not specified in the ASME Section XI Code Division, indications that exceed the acceptance standards for materials and welds specified in the Section III Edition applicable to the construction of the component shall be evaluated to determine disposition.

- 7.2 The evaluation of the results of visual examinations conducted in conjunction with system pressure tests shall be in accordance with Article IWA-5000.
- 7.3 Indications that were recorded in previous Preservice or Inservice Inspections and which were not characterized as propagating flaws will be considered as acceptable for continued service, provided the acceptance standards are met.
- 7.4 The evaluation of any buried components shall be performed in accordance with Article IWD-2000.

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8.0 REPAIR REQUIREMENTS

- 8.1 Repairs to ASME Class 1, 2 and 3 components (and their supports) shall be performed in accordance with the Owner's Design Specification and Construction Code of the component or system. Later editions of the Construction Code or ASME Section III, either in its entirety or portions thereof, can also be used. If repair welding can not be performed in accordance with these requirements, then Article 4000 will be used.
- 8.2 Examinations associated with repairs or modifications shall meet the applicable design and inspection Code requirements as described in the following paragraphs:
- 8.2.1 Whenever ASME Class 1, 2 or 3 system modifications or repairs have been made which involve new strength welds on components greater than 2 inches diameter, the new welds shall receive both surface and 100 percent volumetric examinations, as applicable.
- 8.2.2 Whenever system modifications or repairs have been made which involve new strength welds on ASME Class 1, 2 or 3 components of 2 inches or less, a surface examination shall be performed.
- 8.3 Surface defects in ASME Class 1, 2 or 3 bolts, studs, and nuts may be removed by mechanical means provided the removal of that defect does not alter the basic configuration of the item. Bolts, studs and nuts that have defects that cannot be removed by mechanical means shall be replaced.
- 8.4 Repair of a reactor coolant pump flywheel that has unacceptable defects shall be performed in accordance with USNRC Regulatory Guide 1.14.

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9.0 SYSTEM PRESSURE TESTS

9.1 System pressure tests shall be conducted in accordance with IWA-5000.

9.2 ASME Class 1 Components

9.2.1 Whenever the reactor coolant system is closed after it has been opened, the system shall be leak tested to nominal operating pressure per Article IWB-5000. Temperature and pressure requirements as stated in Turkey Point Plant's "Technical Specifications" shall not be exceeded.

9.2.2 At or near the end of each Inspection Interval, a hydrostatic pressure test shall be performed on ASME Class 1 systems and components. This test shall be conducted in accordance with the requirements of Article IWB-5000. Test pressures and temperatures shall be maintained for at least 4 hours for insulated systems and 10 minutes for non-insulated systems and components prior to performing the visual examination. Temperature and pressure requirements as stated in Turkey Point Plant's "Technical Specifications" shall not be exceeded.

9.3 ASME Class 2 Components

9.3.1 System pressure tests shall be performed at nominal operating pressure each Inspection Period on the exempt components to IWC-5000.

9.3.2 At or near the end of each Inspection Interval, a hydrostatic pressure test shall be performed on ASME Class 2 non-exempted systems and components. This test shall be conducted in accordance with the requirements of Article IWC-5000. When ASME Class 1 systems and components are also being pressurized, the pressure and temperature shall comply with the requirements of Paragraph 9.2.2 of this document.

9.4 ASME Class 3 Components

9.4.1 System and component pressure tests shall be performed at nominal operating pressure each Inspection Period to IWD-5000.

9.4.2 System pressure tests shall be performed at the hydrostatic pressure at, or near, the end of each Inspection Interval to IWD-5000.

10.0 RECORDS AND REPORTS

Records and reports developed from those examinations performed in accordance with this Inspection Plan shall be maintained in accordance with Article IWA-6000.

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11.0 RELIEF REQUESTS

Relief requests for ASME Class 1, 2 and 3 components are identified in Appendix A to this Inspection Plan. However, Paragraphs IWB-1220 and IWC-1220 of ASME Section XI exempt certain components from examinations, where specific conditions are met. These exemptions have been applied to the components listed on Class 1, Class 2 and Class 3 Tables with the result that only those non-exempt components are listed herein.

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1. The first step in the process of the investigation is the identification of the problem. This is done by the investigator who is responsible for the study. The investigator must first identify the problem and then determine the scope of the study. The next step is to design the study. This involves determining the methods to be used and the data to be collected. The third step is to collect the data. This is done by the investigator who is responsible for the study. The fourth step is to analyze the data. This is done by the investigator who is responsible for the study. The fifth step is to interpret the results. This is done by the investigator who is responsible for the study. The sixth step is to write the report. This is done by the investigator who is responsible for the study. The seventh step is to present the results. This is done by the investigator who is responsible for the study. The eighth step is to discuss the results. This is done by the investigator who is responsible for the study. The ninth step is to conclude the study. This is done by the investigator who is responsible for the study. The tenth step is to publish the results. This is done by the investigator who is responsible for the study.

APPENDIX "A"

- RELIEF REQUEST BASIS -

1999-2000

2000-2001

2001-2002

RELIEF REQUEST NO. 1

Examination Requirements:

- (1) Class 1, Table IWB-2600, Examination Category Table IWB-2500
 - (a) B-G-1 Pressure-retaining bolting, 2-inches and larger in diameter, when removed. Volumetric examination is required on RPV closure studs and nuts.
 - (b) B-G-2 Pressure-retaining bolting, smaller than 2-inches in diameter. Visual examination is required on bolting.
- (2) Class 2, Table IWC-2600, Examination Category Table IWC-2520.
 - (a) C-D Pressure-retaining bolting exceeding 1-inch in diameter. Visual and either surface or volumetric examinations are required on bolting.

Relief Requested: Examination Category definitions B-G-1, B-G-2 and C-D as provided in the later editions and addenda of Section XI. In later editions of the Code, Class 1 bolting exactly 2-inches in diameter is shifted from Category B-G-1 to B-G-2 by revision of the Category definition. Similarly, Class 2 bolting between 1 and 2-inch diameter is eliminated from Category C-D of the later editions of the Code.

Basis for Relief:

- (1) These portions of the later Code are adopted pursuant to paragraph (g) of 10CFR50.55a as revised in the proposed rule published in the Federal Register, Volume 44-No. 13 on January 18, 1979. This rule change approves for use later Edition and Addenda of the Code. Paragraph g(4) (iv) of the rule change allows the adoption of portions of later approved editions and addenda to the Code provided that all related requirements of the respective editions and addenda are met. It is felt that the above stated adoptions are in compliance with the proposed change in the regulations.

Alternate Examinations: No alternate or augmented examinations are necessary in this case.

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RELIEF REQUEST NO. 2

Examination Requirement: Class 1, Table IWB-2600, Examination Category Table IWB-2500.

- B-1-1 Interior Clad Surfaces of Reactor Vessels.
- B-1-2 Interior Clad Surfaces of Vessels other than Reactor Vessels.

Relief Requested: From visual examination requirements of interior clad surface area (patches) of pressure vessels.

Basis for Relief: Analysis has shown that flaws which may initiate in the reactor vessel cladding, at locations other than nozzles, are not likely to propagate through the clad-base metal interface. Because of this data, the need to confirm the initiation of clad fissures is not considered relevant. Detection of flaws in the nozzle area is covered by the requirement to volumetrically examine the nozzle to vessel welds and nozzle inside radiused section. This exam will detect the presence of flaws which may have propagated through the cladding into the base material. Accordingly, the ASME has completely eliminated the B-I-1 and B-I-2 examination Categories from later editions of Section XI.

Performing these cladding examinations constitutes needless radiation exposure to personnel with no compensatory increase in safety. Florida Power & Light, therefore, will not perform the above mentioned examinations in the remaining inspection period. The examinations will not be required for subsequent intervals since the requirements have been deleted from the Code.

Alternate Examinations: No alternate or augmented examinations are considered necessary in this case.

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RELIEF REQUEST NO. 3

Examination Requirement: Class 1, Table IWB-2600, Examination Category Table IWB-2500.

B-0 Pressure-retaining welds in Control Rod Drive Housings. Perform volumetric examination to include 100% of the welds in 10% of the peripheral housings during each Inspection Interval.

Relief Requested: Perform surface examination of the pressure-retaining welds in the Control Rod Drive Housings, as provided for in the later Edition and Addenda of Section XI.

Basis for Relief:

- (1) These portions of the later Code are adopted pursuant to paragraph (g) of 10CFR50.55a as revised in the proposed rule published in the Federal Register, Volume 44-No. 13 on January 18, 1979. This rule change approves later Edition and Addenda of the Code. Paragraph g(4) (iv) of the rule change allows the adoption of portions of later approved editions and addenda to the Code provided that all related requirements of the respective editions and addenda are met. It is felt that the above stated adoptions are in compliance with the proposed change in the regulations.
- (2) Volumetric examinations of these welds are impractical due to design configuration, accessibility and materials of construction.
 - (a) Ultrasonic examination will not provide meaningful results due to the geometric configuration of the joint, the internal configuration (thermal sleeve pressed in the CRD tube) and material properties (inconel-to-stainless steel welds).
 - (b) Radiographic examination cannot be performed without removing the control rod from the housing. The radiographic examination results will not be conclusive due to the interference of the thermal sleeve.
- (3) Florida Power & Light believes that the later Edition and Addenda of Section XI provides more assurance to the overall structural integrity of the components.

Alternate Examinations: No alternate or augmented examinations are necessary in this case.

The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that proper record-keeping is essential for the integrity of the financial system and for the ability to detect and prevent fraud. The document also outlines the responsibilities of individuals involved in the process, including the need for transparency and accountability.

In the second part, the document addresses the challenges faced by organizations in implementing effective internal controls. It highlights the need for a strong culture of ethics and integrity, as well as the importance of regular training and education for all employees. The document also discusses the role of external auditors in providing independent verification of the financial statements.

The third part of the document focuses on the importance of communication and collaboration between different departments and stakeholders. It stresses that effective communication is crucial for the successful implementation of any initiative and for the overall performance of the organization. The document also outlines the need for regular reporting and updates to keep all parties informed of progress and any issues that may arise.

Finally, the document concludes by reiterating the importance of ongoing monitoring and evaluation. It states that the effectiveness of any system or process can only be determined through regular assessment and adjustment. The document encourages organizations to embrace a mindset of continuous improvement and to seek out opportunities for innovation and growth.

RELIEF REQUEST NO. 4

Examination Requirement: Class 1, Table IWB-2600, Examination Category Table IWB-2500.

B-H Integrally-welded vessel supports. Perform volumetric examination on 10% of the weld circumference of support skirts, and 100% of the weld lug attachment to the vessel during each Inspection Interval.

Relief Requested: Perform surface examination of the integrally-welded vessel supports, as provided in the later Edition and Addenda of Section XI.

Basis for Relief:

- (1) These portions of the later Code are adopted pursuant to paragraph (g) of 10CFR50.55a as revised in the proposed rule published in the Federal Register, Volume 44-No. 13 on January 18, 1979. This rule change approves later Edition and Addenda of the Code. Paragraph g(4) (iv) of the rule change allows the adoption of portions of later approved editions and addenda to the Code provided that all related requirements of the respective editions and addenda are met. It is felt that the above stated adoptions are in compliance with the proposed change in the regulations.
- (2) Volumetric examinations on numerous integrally-welded supports are found to be impractical. Because of their design and configuration, these welds are not generally conducive to meaningful nor conclusive ultrasonic or radiographic examinations.
- (3) Performing examinations to these items which are not conducive to volumetric examinations, under adverse conditions of dose rates as high as 15 R/hr, provides no additional information to the component's structural integrity.
- (4) Florida Power & Light believes that the later Edition and Addenda of Section XI provide more assurance to the overall structural integrity of the components.

Alternate Examinations: No alternate or augmented examinations are necessary this case.

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RELIEF REQUEST NO. 5

Examination Requirements: Class 1, IWB-2600, Examination Category
Table IWB-2500.

B-K-1 Support Members for Piping, Valves and Pumps. 25% of the integrally welded external supports are required to be volumetrically examined during the Inspection Interval.

Relief Requested: Perform surface examination of 100% of the integrally welded external supports whose support base material design thickness is 5/8 in. and greater, as provided in the later edition of Section XI.

Basis for Relief:

- (1) These portions of the later Code are adopted pursuant to paragraph (g) of 10CFR50.55a as revised in the proposed rule published in the Federal Register, Volume 44 - No. 13 on January 18, 1979. This rule change approves later edition and addenda of the Code. Paragraph g(4) (iv) of the rule change allows the adoption of portions of later approved editions and addenda to the Code provided that all related requirements of the respective editions and addenda are met. It is felt that the above stated adoptions are in compliance with the proposed change in the regulations.
- (2) Volumetric examinations on numerous integrally welded supports are found to be impractical. Because of the design and configuration, these welds are not generally conducive to meaningful nor conclusive ultrasonic or radiographic examinations.
- (3) Florida Power & Light believes that the later edition and addendas of Section XI provides more assurance to the overall structural integrity of the components.

Alternate Examinations: No alternative or augmented examinations are necessary in this case.

1. The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that proper record-keeping is essential for the transparency and accountability of the organization. This section also outlines the various methods used to collect and analyze data, ensuring that the information is reliable and up-to-date.

2. The second part of the document focuses on the implementation of these practices across different departments. It provides a detailed overview of the current state of affairs, highlighting areas where improvements are needed. The text also includes a list of specific actions that must be taken to address these issues, along with a timeline for their completion.

3. The third part of the document discusses the role of technology in enhancing the efficiency of the record-keeping process. It explores various software solutions and tools that can be used to streamline data collection and analysis. This section also addresses the challenges associated with integrating new technologies into existing systems and provides strategies to overcome them.

4. The fourth part of the document discusses the importance of training and education in ensuring that all staff members are equipped with the necessary skills to perform their duties effectively. It outlines a comprehensive training program that covers all aspects of the record-keeping process, from data collection to analysis and reporting. The text also includes a list of resources and materials that can be used to support this program.

5. The fifth part of the document discusses the importance of regular communication and reporting in keeping all stakeholders informed of the organization's progress. It outlines a system of regular reports and updates that will be provided to all relevant parties. This section also includes a list of key performance indicators (KPIs) that will be used to measure the success of the organization's efforts.

6. The sixth part of the document discusses the importance of maintaining a high level of security and confidentiality in all record-keeping activities. It outlines a series of measures that will be taken to protect the organization's data from unauthorized access and disclosure. This section also includes a list of policies and procedures that will be used to ensure that all staff members are aware of and comply with these requirements.

7. The seventh part of the document discusses the importance of maintaining a high level of accuracy and integrity in all record-keeping activities. It outlines a series of measures that will be taken to ensure that all data is entered correctly and that all records are maintained in a secure and accessible manner. This section also includes a list of policies and procedures that will be used to ensure that all staff members are aware of and comply with these requirements.

8. The eighth part of the document discusses the importance of maintaining a high level of transparency and accountability in all record-keeping activities. It outlines a series of measures that will be taken to ensure that all data is entered correctly and that all records are maintained in a secure and accessible manner. This section also includes a list of policies and procedures that will be used to ensure that all staff members are aware of and comply with these requirements.

9. The ninth part of the document discusses the importance of maintaining a high level of efficiency and effectiveness in all record-keeping activities. It outlines a series of measures that will be taken to ensure that all data is entered correctly and that all records are maintained in a secure and accessible manner. This section also includes a list of policies and procedures that will be used to ensure that all staff members are aware of and comply with these requirements.

10. The tenth part of the document discusses the importance of maintaining a high level of consistency and uniformity in all record-keeping activities. It outlines a series of measures that will be taken to ensure that all data is entered correctly and that all records are maintained in a secure and accessible manner. This section also includes a list of policies and procedures that will be used to ensure that all staff members are aware of and comply with these requirements.

RELIEF REQUEST NO. 6

Examination Requirement: Class 1, Table IWB-2600, Examination Category Table IWB-2500.

B-L-2 Pump Casings. Perform a visual examination of the internal pressure boundary surfaces on one pump in each of the group of pumps performing similar functions in the system during each Inspection Interval.

Relief Requested: Perform a visual examination of the required pump(s) internal surfaces only if disassembled for maintenance, not at a specified time during the Inspection Interval.

Basis for Relief:

- (1) To perform the visual examination requires the pump to be disassembled resulting in large expenditures of manhours and man-rem with essentially no compensating increase in plant safety. Based on actual data compiled from the disassembly of a reactor coolant pump, it is expected that approximately 1000 man-hours and 50 man-rem will be expended in the disassembly, inspection and reassembly of one pump. performing this visual examination under such adverse conditions as high dose rates (30-40 R/hr) and as-cast surface conditions, provides little additional information as to the pump's casing integrity.
- (2) The structural integrity afforded by the existing pump casing material will not significantly degrade over its lifetime. The reactor coolant pump casing material, cast stainless steel (ASTM A351-CF8), is widely used in the nuclear industry and has performed extremely well. The presence of some delta ferrite (typically 5% or more) imparts substantially increases resistance to intergranular stress corrosion cracking. The delta ferrite also results in improved resistance to pitting corrosion in chloride containing environments.
- (3) Florida Power & Light feels that adequate safety margins are inherent to the basic pump design that the health and safety of the public will not be adversely affected by deferring the visual examination of the pump internal pressure boundary surfaces only when the pumps are required to be disassembled for maintenance.

Alternate Examinations: No alternate or augmented examinations are considered necessary in this case.

RELIEF REQUEST NO. 7

Examination Requirement: Class 1, Table IWB-2600, Examination Category Table IWB-2500.

B-L-1 Pressure retaining welds in pump casings. Perform a volumetric examination, to include 100% of the pressure-retaining welds, on one pump in each group of pumps performing similar function in the system during each Inspection Interval.

Relief Requested: Perform volumetric examination of the required pump(s) weld surfaces only if disassembled for maintenance, not at a specified time during the Inspection Interval.

Basis for Relief:

- (1) Ultrasonic techniques have not been developed to meet the Code requirements.
- (2) Radiographic examination is not possible without the complete disassembly of the pump. To perform this examination, large expenditures of manhours and man-rem are required with essentially no compensating increase in plant safety. Based on actual data compiled from the disassembly of a reactor coolant pump, it is expected that approximately 1000 man-hours and 50 man-rem exposure will be expended in the disassembly, inspection and reassembly of one pump. Performing this examination under such adverse conditions as high dose rates (30-40 R/hr) provides little additional information as to the pump's casing integrity.
- (3) Florida Power & Light feels that adequate safety margins are inherent in the basic pump design and that the health and safety of the public will not be adversely affected by deferring the volumetric examination of the pump casing pressure boundary weld surfaces only when the pumps are required to be disassembled for maintenance.
- (4) In the event that an ultrasonic examination technique is developed that meets the Code requirements, the intent of the Code will be followed.

Alternate Examinations: No alternate or augmented examinations are considered necessary in this case.

1. The first part of the report is a general introduction to the subject of the study. It discusses the importance of the study and the objectives of the research.

2. The second part of the report is a detailed description of the methodology used in the study. It includes information about the sample size, the data collection methods, and the statistical analysis techniques.

3. The third part of the report is a discussion of the results of the study. It presents the findings of the research and compares them with the previous studies in the field.

4. The fourth part of the report is a conclusion and a list of references.

5. The fifth part of the report is a list of references. It includes all the sources of information used in the study, such as books, articles, and websites.

6. The sixth part of the report is a list of references. It includes all the sources of information used in the study, such as books, articles, and websites.

7. The seventh part of the report is a list of references. It includes all the sources of information used in the study, such as books, articles, and websites.

8. The eighth part of the report is a list of references. It includes all the sources of information used in the study, such as books, articles, and websites.

9. The ninth part of the report is a list of references. It includes all the sources of information used in the study, such as books, articles, and websites.

RELIEF REQUEST NO. 8

Examination Requirement: Class 1, Table IWB-2600, Examination Category Table IWB-2500.

B-M-2 Valve Bodies. Perform a visual examination of the internal pressure boundary surfaces of one valve in each group of valves of the same constructional design, manufacturing method and manufacturer that perform similar functions in the system during each inspection interval.

Relief Requested: Perform a visual examination of the required valve(s) internal surfaces only if disassembled for maintenance, not at a specified time during the inspection interval.

Basis for Relief:

- (1) The requirement to disassemble primary system valves for the sole purpose of performing a visual examination of the internal pressure boundary surfaces has only a very small potential of increasing plant safety margins and a very disproportionate impact on expenditures of plant manpower and radiation exposure.
- (2) Performing these visual examinations under such adverse conditions of dose rates as high as 10 R/hr and as-cast surface conditions, provides little additional information as to the valve's internal surface integrity.
- (3) The performance of both carbon and stainless cast valve bodies has been excellent in all PWR applications. Based on this experience and both industry and regulatory acceptance of these alloys, continued excellent service performance is anticipated.
- (4) Florida Power & Light believes a more practical approach would be to examine the internal pressure boundary of only those valves that require disassembly for maintenance purposes. This would essentially provide an equivalent sampling of primary system valves, reduce radiation exposure to plant personnel and give adequate assurance that the integrity of these components is being maintained.

Alternate Examinations: An examination of the internal pressure boundary surfaces will be performed, to the extent practical, each time a valve is disassembled for maintenance purposes.

TURKEY POINT PLANT UNIT 3
FIRST 10-YEAR INSERVICE EXAMINATION PLAN
CLASS 1

ASME ASME
SECT. XI SECT. XI
ITEM NO. CATEGORY

EXAMINATION AREA IDENTIFICATION

EXAMINATION METHOD

REMARKS

REACTOR VESSEL

| | | | | |
|-------|-------|---|------------------------|---|
| B1.1 | B-A | Longitudinal and circumferential shell welds in core region | Volumetric | |
| B1.2 | B-B | Longitudinal and circumferential welds in shell (other than those of Category B-A and B-C) and meridional and circumferential seam welds in bottom head and closure head (other than those of Category B-C) | Volumetric | |
| B1.3 | B-C | Vessel-to-flange and head-to-flange circumferential welds | Volumetric | |
| B1.4 | B-D | Primary nozzle-to-vessel welds and nozzle inside radiused section | Volumetric | |
| B1.5 | B-E | Vessel penetrations, including control rod drive and instrumentation penetrations | Visual | Per IWA-5000 |
| B1.6 | B-F | Nozzle-to-safe end welds | See Remarks | See Item No. B4.1. |
| B1.7 | B-G-1 | Closure studs, in place | See Remarks | Not applicable. |
| B1.8 | B-G-1 | Closure studs and nuts, when removed | Volumetric and Surface | See Relief Request #1. |
| B1.9 | B-G-1 | Ligaments between threaded stud holes | Volumetric | See Relief Request #1. |
| B1.10 | B-G-1 | Closure washers | Visual | See Relief Request #1. |
| B1.11 | B-G-2 | Pressure-retaining bolting | See Remarks | Not applicable. |
| B1.12 | B-H | Integrally-welded vessel supports | See Remarks | Integral support pads on nozzles. Excluded by Code. |
| B1.13 | B-I-1 | Closure Head Cladding | See Remarks | See Relief Request #2. |
| B1.14 | B-I-1 | Vessel Cladding | See Remarks | See Relief Request #2. |
| B1.15 | B-N-1 | Vessel Interior | Visual | |
| B1.16 | B-N-2 | Interior attachments and core support structures | See Remarks | Not applicable to PWRs. |
| B1.17 | B-N-3 | Core-support structures | Visual | |
| B1.18 | B-O | Control rod drive housings | Surface | See Relief Request #3. |
| B1.19 | B-P | Exempted components | Visual | Per IWA-5000. |

PRESSURIZER

| | | | | |
|-------|-------|--|-------------|--|
| B2.1 | B-B | Longitudinal and circumferential welds | Volumetric | |
| B2.2 | B-D | Nozzle-to-vessel welds and nozzle-to-vessel radiused section | Volumetric | Nozzle-to-vessel welds are not applicable. |
| B2.3 | B-E | Heater penetrations | Visual | Per IWA-5000. |
| B2.4 | B-F | Nozzle-to-safe end welds | See Remarks | See Item No. B4.1. |
| B2.5 | B-G-1 | Pressure-retaining bolts and studs, in place | See Remarks | Not applicable. |
| B2.6 | B-G-1 | Pressure-retaining bolts and studs, when removed | See Remarks | Not applicable. |
| B2.7 | B-G-1 | Pressure-retaining bolting | See Remarks | Not applicable. |
| B2.8 | B-H | Integrally-welded vessel supports | Volumetric | |
| B2.9 | B-I-2 | Vessel cladding | See Remarks | See Relief Request #2. |
| B2.10 | B-P | Exempted components | Visual | Per IWA-5000. |
| B2.11 | B-G-2 | Pressure-retaining bolting | Visual | |

TURKEY POINT PLANT UNIT 3
FIRST 10-YEAR INSERVICE EXAMINATION PLAN
CLASS 1

| ASME
SECT. XI
ITEM NO. | ASME
SECT. XI
CATEGORY | EXAMINATION AREA IDENTIFICATION | EXAMINATION METHOD | REMARKS |
|------------------------------|------------------------------|---------------------------------|--------------------|---------|
|------------------------------|------------------------------|---------------------------------|--------------------|---------|

HEAT EXCHANGERS AND STEAM GENERATORS

| | | | | |
|-------|-------|---|-------------|---|
| B3.1 | B-B | Longitudinal and circumferential welds, including tube sheet-to-head or shell welds on the primary side | Volumetric | |
| B3.2 | B-D | Nozzle-to-head welds and nozzle inside radiused section on the primary side | Volumetric | Nozzle-to-head welds are not applicable for the Steam Generators, and nozzle inside radiused section is not applicable for the Heat Exchangers. |
| B3.3 | B-F | Nozzle-to-safe end welds | See Remarks | See Item No. B4.1. |
| B3.4 | B-G-1 | Pressure-retaining bolts and studs, in place | See Remarks | Not applicable. |
| B3.5 | B-G-1 | Pressure-retaining bolts and studs, when removed | See Remarks | Not applicable. |
| B3.6 | B-G-1 | Pressure-retaining bolting | See Remarks | Not applicable. |
| B3.7 | B-H | Integrally-welded vessel supports | Surface | See Relief Request #4. Not applicable for the Steam Generators. |
| B3.8 | B-I-2 | Vessel Cladding | See Remarks | See Relief Request #2. Not applicable for the Heat Exchangers. |
| B3.9 | B-P | Exempted components | See Remarks | Not applicable. |
| B3.10 | B-G-2 | Pressure-retaining bolting | Visual | Not applicable for the Heat Exchangers. |

PIPING PRESSURE BOUNDARY

| | | | | |
|-------|-------|--|------------------------|------------------------|
| B4.1 | B-F | Safe-end to piping welds and safe-end in branch piping welds | Volumetric and Surface | |
| B4.2 | B-G-1 | Pressure-retaining bolts and studs, in place | See Remarks | Not applicable. |
| B4.3 | B-G-1 | Pressure-retaining bolts and studs, when removed | See Remarks | Not applicable. |
| B4.4 | B-G-1 | Pressure-retaining bolting | See Remarks | Not applicable. |
| B4.5 | B-J | Circumferential and longitudinal pipe welds | Volumetric | |
| B4.6 | B-J | Branch pipe connection welds exceeding six in. diameter | Volumetric | |
| B4.7 | B-J | Branch pipe connection welds six in. diameter and smaller | Surface | |
| B4.8 | B-J | Socket welds | Surface | |
| B4.9 | B-K-1 | Integrally welded supports | Volumetric or Surface | See Relief Request #5. |
| B4.10 | B-K-2 | Support components | Visual | |
| B4.11 | B-P | Exempted components | Visual | Per IWA-5000. |
| B4.12 | B-G-2 | Pressure-retaining bolting | Visual | |

TURKEY POINT PLANT UNIT 3
FIRST 10-YEAR INSERVICE EXAMINATION PLAN
CLASS 1

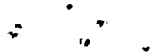
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SECT. XI
ITEM NO. | ASME
SECT. XI
CATEGORY | EXAMINATION AREA IDENTIFICATION | EXAMINATION METHOD | REMARKS |
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PUMP PRESSURE BOUNDARY

| | | | | |
|------|-------|---|------------------------|------------------------|
| B5.1 | B-G-1 | Pressure-retaining bolts and studs , in place | Volumetric | See Relief Request #1. |
| B5.2 | B-G-1 | Pressure-retaining bolts and studs , when removed | Volumetric and Surface | See Relief Request #1. |
| B5.3 | B-G-1 | Pressure-retaining bolting | Visual | See Relief Request #1. |
| B5.4 | B-K-1 | Integrally-welded supports | Volumetric or Surface | See Relief Request #5. |
| B5.5 | B-K-2 | Support components | Visual | |
| B5.6 | B-L-1 | Pump casing welds | Volumetric | See Relief Request #7. |
| B5.7 | B-L-2 | Pump casings | Visual | See Relief Request #6. |
| B5.8 | B-P | Exempted components | See Remarks | Not applicable. |
| B5.9 | B-G-2 | Pressure-retaining bolting | Visual | |

VALVE PRESSURE BOUNDARY

| | | | | |
|------|-------|---|-------------|------------------------|
| B6.1 | B-G-1 | Pressure-retaining bolts and studs , in place | See Remarks | Not applicable. |
| B6.2 | B-G-1 | Pressure-retaining bolts and studs , when removed | See Remarks | Not applicable. |
| B6.3 | B-G-1 | Pressure-retaining bolting | See Remarks | Not applicable. |
| B6.4 | B-K-1 | Integrally welded supports | See Remarks | Not applicable. |
| B6.5 | B-K-2 | Support components | See Remarks | Not applicable. |
| B6.6 | B-M-1 | Valve-body welds | See Remarks | Not applicable. |
| B6.7 | B-M-2 | Valve bodies | Visual | See Relief Request #8. |
| B6.8 | B-P | Exempted components | Visual | Per IWA-5000. |
| B6.9 | B-G-2 | Pressure-retaining bolting | Visual | |



TURKEY POINT PLANT UNIT 3
FIRST 10-YEAR INSERVICE EXAMINATION PLAN
CLASS 2

ASME ASME
SECT. XI SECT. XI
ITEM NO. CATEGORY

EXAMINATION AREA IDENTIFICATION

EXAMINATION METHOD

REMARKS

PRESSURE VESSELS

| ITEM NO. | CATEGORY | EXAMINATION AREA IDENTIFICATION | EXAMINATION METHOD | REMARKS |
|----------|----------|---------------------------------|---|------------------------|
| C1.1 | C-A | Circumferential butt welds | Volumetric | |
| C1.2 | C-B | Nozzle-to-vessel welds | Volumetric | |
| C1.3 | C-C | Integrally-welded supports | Surface | |
| C1.4 | C-D | Pressure-retaining bolting | Visual and either surface or volumetric | See Relief Request #1. |

PIPING

| ITEM NO. | CATEGORY | EXAMINATION AREA IDENTIFICATION | EXAMINATION METHOD | REMARKS |
|----------|----------|--------------------------------------|---|------------------------|
| C2.1 | C-F, C-G | Circumferential butt welds | Volumetric | |
| C2.2 | C-F, C-G | Longitudinal weld joints in fittings | Volumetric | |
| C2.3 | C-F, C-G | Branch pipe-to-pipe weld joints | Volumetric | |
| C2.4 | C-D | Pressure-retaining bolting | Visual and either surface or volumetric | See Relief Request #1. |
| C2.5 | C-E-1 | Integrally-welded supports | Surface | |
| C2.6 | C-E-2 | Support components | Visual | |

PUMPS

| ITEM NO. | CATEGORY | EXAMINATION AREA IDENTIFICATION | EXAMINATION METHOD | REMARKS |
|----------|----------|---------------------------------|---|------------------------|
| C3.1 | C-F, C-G | Pump casing welds | See Remarks | Not applicable. |
| C3.2 | C-D | Pressure-retaining bolting | Visual and either surface or volumetric | See Relief Request #1. |
| C3.3 | C-E-1 | Integrally-welded supports | See Remarks | Not applicable. |
| C3.4 | C-E-2 | Support components | Visual | |

VALVES

| ITEM NO. | CATEGORY | EXAMINATION AREA IDENTIFICATION | EXAMINATION METHOD | REMARKS |
|----------|----------|---------------------------------|---|------------------------|
| C4.1 | C-F, C-G | Valve body welds | See Remarks | Not applicable. |
| C4.2 | C-D | Pressure-retaining bolting | Visual and either surface or volumetric | See Relief Request #1. |
| C4.3 | C-E-1 | Integrally-welded supports | See Remarks | Not applicable. |
| C4.4 | C-E-2 | Support components | See Remarks | Not applicable. |

TURKEY POINT PLANT UNIT 3
FIRST 10-YEAR INSERVICE EXAMINATION PLAN
CLASS 3

100% of the components and systems shall be examined and tested in accordance with IWA-5000 ; IWD-5000 ; and IWD-2600 by the expiration of the inspection interval.

100% of the components and systems (and their supports) shall be examined in accordance with IWA-5240 and IWD-2600 while in operation or during system inservice testing , by the expiration of each inspection period of the inspection interval.



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