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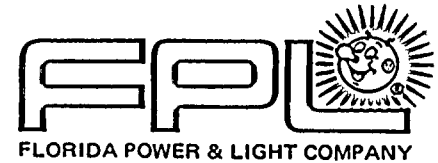
ACCESSION NBR: 8206220219 DOC. DATE: 82/06/14 NOTARIZED: NO DOCKET #
 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250
 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251
 AUTH. NAME AUTHOR AFFILIATION
 URRIG, R. E. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 VARGA, S. A. Operating Reactors Branch 1

SUBJECT: Forwards response to NRC 820316 preliminary questions re
 inservice insp program.

DISTRIBUTION CODE: A047S COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 5
 TITLE: Inservice Inspection/Testing & Related Correspondence

NOTES:

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| EXTERNAL: | ACRS 16 | 10 10 | LPDR 03 | 1 1 |
| | NRC PDR 02 | 1 1 | NSIC 05 | 1 1 |
| | NTIS | 1 1 | | |



June 14, 1982
L-82-245

Office of Nuclear Reactor Regulation
Attention: Mr. Steven A. Varga, Chief
Operating Reactors Branch #1
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Varga:

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250 and 50-251
Inservice Inspection Program

Please find attached our response to your preliminary questions regarding the Inservice Inspection Program as requested in your letter dated March 16, 1982.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Robert E. Uhrig".

Robert E. Uhrig
Vice President
Advanced Systems and Technology

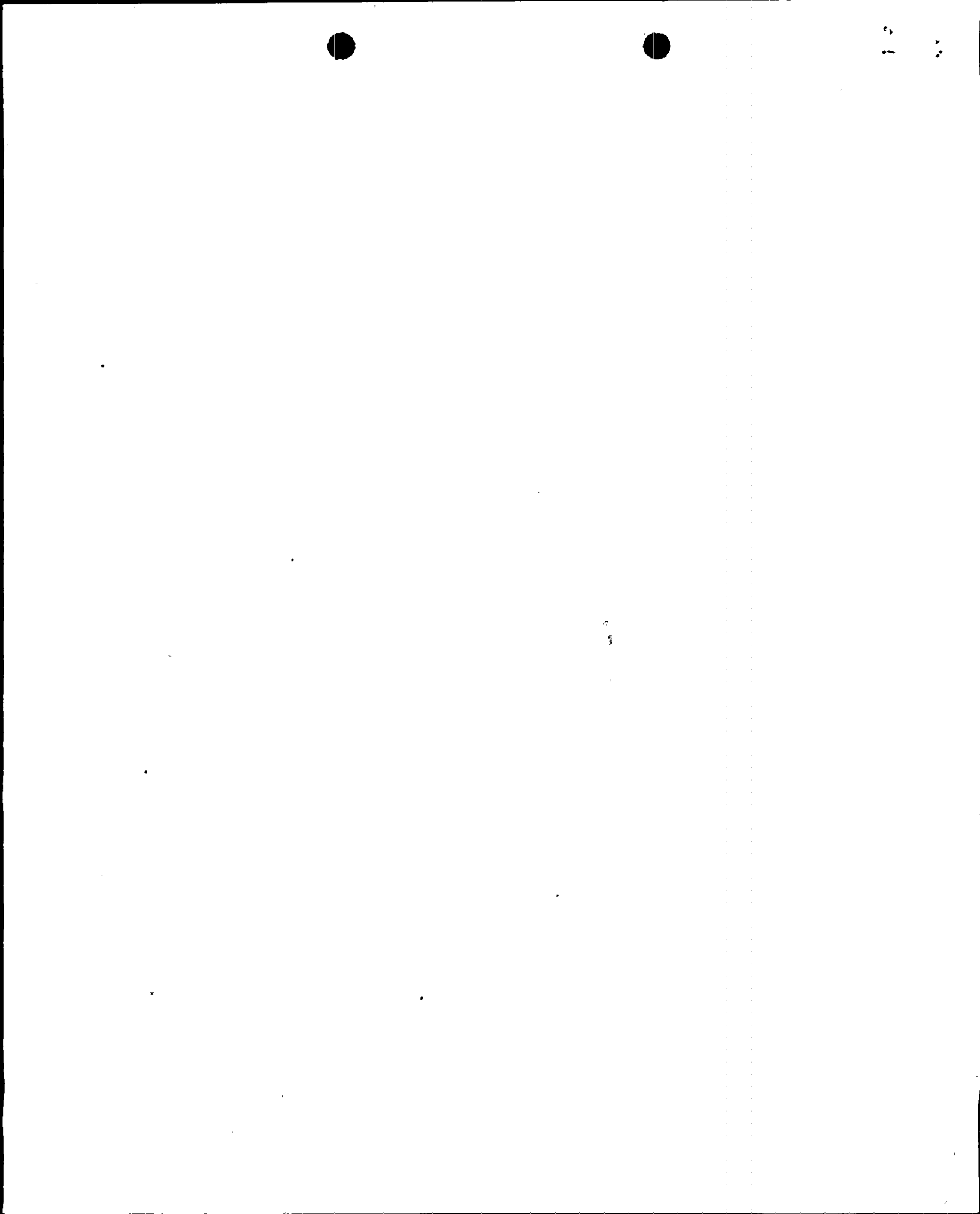
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Attachment

cc: J.P. O'Reilly, Region II
Harold F. Reis, Esquire

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G. PDR



TURKEY POINT 3

1. Evaluation Criteria in Ultrasonic Examination of Piping Welds (Ref.; Item 1, Ref. 4 and 5).

Query: Is Reference 1 still a valid relief request to be used in the evaluation criteria?

Response: FPL evaluation criteria is being conducted to the first relief request (Ref. 1) alternative evaluation criteria which corresponds to the NRC Staff position (Ref. 4).

2. Pressure Tests for Repair Examination (Item 2, Ref. 4 and 5).

Query: Has FPL identified any circumstances where pressure tests were deemed impractical following repair examinations?

Response: No. To date, FPL found it necessary to make some repairs (by grinding and/or weld deposition). These repairs were re-examined by the same method of examination which detected the flaws. Subsequently, pressure tests were conducted to the Code. Therefore, there has been no reason for a relief request under these circumstances.

3. Pressure and Temperature Requirements of IWB-5000 (Item 3, Ref. 4 and 5).

Query: Has FPL found it necessary for code relief resulting from the FPL Tech Specs vice IWB-5000?

Response: No.

4. Exempting Lines based on Pipe Size (Item 4, Ref. 4 and 5).

Query: Does FPL intend to inspect all Class 1 branch lines under 6-inches diameter in accordance with Item B4.7 of Table IWB-2600?

Response: Yes, except 1-inch diameter and below are subjected to visual examinations as provided by IWB-1220(c).

5. Exempting ECCS Components (item 5, Rev. 4 and 4).

Query: What examination program is proposed for ECCS, RHR and CHR components and what is the basis?

Response: FPL treats the ECCS, RHR and CHR system components as non-exempt except for 1) containment spray which is considered an Emergency Core Cooling System as provided by IWC-1220 (b) and 2) component connections, piping, and associated valves, and vessels (and their supports) that are 4-inch nominal pipe size and smaller as provided by IWC-1220(d). Accordingly, except for the above, the remainder of the components in these systems are subjected to the examination requirements of IWC-2520. The specific category for each of the multiple and/or single stream systems are reviewed and the required examinations are

distributed among the total number of components and streams by the allocation procedure provided by IWC-2411(b) through (e), inclusive.

6. Visual Examination of Pump Casings (Relief Request No. 6, Ref. 4)

Query: A reply is requested which addresses industry and manufacturer's and recommendations experiences in permitting pump internal visual inspection to be performed only upon disassembly of the pump for maintenance which could exceed the inspection interval period.

Response: When FPL requested relief from the code requirement, the state of the art did not provide for a practical mechanism to conduct visual examinations of the internals without subjecting personnel to high radiation exposure. Recently, a RCP inspection system was developed which provides for a mechanized examination of the pump internals. This system was used successfully during the steam generator replacement outage. Therefore, this relief request is withdrawn.

7. Volumetric Examination of Pump Casing Welds (Relief Request No 7, Ref. 3).

Query: Similar to Query No. 6 above, additional information is requested to justify this relief request.

Response: Same as Query No. 6 above, except that radiographic examination of the pump welds was conducted successfully using the Minac RCP Inspection System device during the steam generator replacement outage. Therefore, this relief request is withdrawn.

TURKEY POINT UNIT 4

1. Relationship of Turkey Point 3 and Turkey Point 4 Programs.

Query: Has FPL given consideration to combining the Turkey Point 3 and 4 programs? Further, do the relief requests of Turkey Point 3 have applicability to Turkey Point 4?

Response: It is the intent of FPL to combine the Turkey Point 3 and 4 programs with respect to the ASME Section XI Code 1974 Edition thru Summer 1975 Addenda. However, it is recognized that due to subtle differences in the plant's configurations there will be a separate Inspection Plan for each unit. We are presently in the process of addressing the Turkey Point 4 program and Inspection Plan in preparation for the Steam Generator replacement outage which is scheduled for October 1982. We are currently in the third period of the first interval and plan to perform all, or most, of our 40-month ISI during this outage. To this end, we are planning to exercise the same relief requests as they apply to Turkey Point 4.

FPL intends to submit the Turkey Point 4 ISI program for the Third Period to NRC on July 16, 1982.

2. Response to previous RAI.

Query: FPL submitted a partial response to the NRC Staff (Ref. 3, 77-372, dated 12/9/77) to NRC's request for additional information (Ref. 2, Lear to Uhrig, dated 9/7/77). NRC raised the question whether this information was transmitted under a separate transmittal?

Response: No. FPL's review of the unanswered questions submitted to the NRC Staff by Reference 3 are:

1. II. Inservice Inspection - Class 1 components.

Question 7. Provide all figures referenced in the Table for Class 1 examination.

Response. We are continuing to pursue documentation used in support of ISI programs thru the efforts of I.E. Bulletin 79-14, on-going drawing up-dates and obtaining documents from vendor's that supplied the original plant components.

2. II. Pressure Tests - Class 1 Components

Question 1. Provide all figures listed for Class 1 components.

Response: Same response as Item 1 above.

Figure 1 is a line graph showing the number of cases of COVID-19 in the United States from March 2020 to March 2021. The x-axis represents time in months, and the y-axis represents the number of cases. The graph shows a sharp increase in cases starting in March 2020, peaking in May 2020, and then declining. A vertical line is drawn at the end of the data series in March 2021.

3. III. Class 2 Components

Question 1. Provide levels of radiation in those cases where relief is requested.

Response. FPL will provide the levels of radiation, in addition to other necessary information, where it is considered necessary to request a relief from the Code.

Question 2. Provide all figures listed as references for Class 2 pressure tests.

Response. Same response as item 1. above.

4. III. Class 2 Components

Question 1. Provide levels of radiation in those cases where relief is requested.

Response. Same response as item 3 above.

Question 2. Provide all figures listed as references for Class 3 pressure tests.

Response. Same response as item 1 above.

3. Program Interval

Query: When approved by the NRC Staff, FPL would be in the last 80 months of the First Inspection Interval. Does FPL intend to make any changes to the existing relief requests or propose other relief requests?

Response. FPL would propose to request the same relief from the Code as proposed in Turkey Point 3, except for the relief requests that have been withdrawn for aforementioned reasons.

