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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
WILLIAMS, J. W. Florida Power & Light Co.
RECIP. NAME RECIPIENT AFFILIATION
THOMPSON, H. L. Division of Pressurized Water Reactor Licensing - A (post 8

SUBJECT: Forwards Relief Requests 13 & 14 for ASME Code requirements for inservice insp for review Unit 4 refueling outage scheduled for jan 1986.

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FLORIDA POWER & LIGHT COMPANY

DEC 6 1985
L-85-451

Office of Nuclear Reactor Regulation
Attention: Mr. Hugh L. Thompson, Director
Division of PWR Licensing - A
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Thompson:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Relief Request From Inservice Inspection
ASME Code Requirements

Pursuant to 10 CFR 50.55a (g) (5) (iii), Florida Power & Light Company has determined that conformance with certain ASME Code Requirements for Turkey Point Units 3 & 4 is impractical. Accordingly, we have prepared Relief Request Numbers 13 and 14 to address these requirements. The requests are attached.

In order to make use of these relief requests during the upcoming Turkey Point Unit 4 outage, we would appreciate an early review of our submittals. The Unit 4 refueling outage is currently scheduled to begin in early January, 1986.

Should you or your staff have any questions on these requests, please contact us.

Very truly yours,

J. W. Williams, Jr.
Group Vice President
Nuclear Energy

JWW/PLP:mls

cc: Dr. J. Nelson Grace, Region II, USNRC
Harold F. Reis, Esquire
PNS-LI-85-478/2

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TURKEY POINT UNITS 3 & 4

SECOND INSPECTION INTERVAL

INSERVICE INSPECTION

RELIEF REQUEST # 13

A. COMPONENT IDENTIFICATION:

- CLASS 1
- CODE EXAMINATION CATEGORY B-J & B-F
- MAIN COOLANT PIPING WELDS

B. EXAMINATION REQUIREMENTS:

III-3410 - "THE BASIC CALIBRATION BLOCKS SHALL BE MADE FROM MATERIAL OF THE SAME NOMINAL DIAMETER AND NOMINAL WALL THICKNESS OR PIPE SCHEDULE AS THE PIPE TO BE EXAMINED."

C. BASIS FOR RELIEF:

- Existing piping consists of three (3) sizes:

Nominal ID	Thickness Range
27.5"	2.25" to 2.5"
29"	2.7" to 2.9"
31"	2.6" to 3.3"

- The piping system also consists of two (2) materials within the three (3) sizes:

  Pipe A376 TP 316, Fittings A351 GR CF8M

- III-3410, as written, would require six (6) different calibration blocks representing both material types in the three sizes.

- FP&L proposes to continue to use three (3) calibration blocks:

  1) A351 GR CF8M, 27.5" ID x 3" wall
  2) A376 TP 316, 29" ID x 2.6" wall
  3) A376 TP 316, 29" ID x 2.4" wall

- The small difference in diameter will not affect the ultrasonic examination. ASME Section V, Article 5 has allowed a range of sizes, particularly in the case of diameters greater than 20 inches.

- The small difference in wall thickness is within piping tolerances for nominal wall and will not affect ultrasonic examination because metal path calibration techniques are used. Ultrasonic indications are resolved by full scale plotting based on pipe actual wall thickness.

- The three proposed blocks have been in use since the Plant was built, their continued use would tend to provide consistent results.

D. ALTERNATIVE EXAMINATION

1) Perform the Code required examinations with the proposed Ultrasonic calibration blocks.

2) The alternative examinations provide an assurance of acceptable quality and safety.

E. IMPLEMENTATION SCHEDULE

- SECOND INSPECTION INTERVAL

TURKEY POINT UNITS 3 & 4

SECOND INSPECTION INTERVAL

RELIEF REQUEST # 14

A. COMPONENT CLASSIFICATION:

- CLASS 2
- MAIN STEAM REDUCER TO NOZZLE PIPING WELDS
- APPENDIX III, SECTION XI, 1980 EDITION THROUGH WINTER 1981 ADDENDA
- CODE ITEM NUMBER C5.21
- CODE CATEGORY C-F

B. EXAMINATION REQUIREMENTS:

III-3410 - "THE BASIC CALIBRATION BLOCKS SHALL BE MADE FROM MATERIAL OF THE SAME NOMINAL DIAMETER AND NOMINAL WALL THICKNESS OR PIPE SCHEDULE AS THE PIPE TO BE EXAMINED."

C. RELIEF REQUESTED:

Relief is requested from compliance with Appendix III, paragraph III-3410, for those welds on the Turkey Point Units 3 & 4 main steam reducer to nozzle welds utilizing a calibration block made from a material of the same nominal diameter and nominal wall thickness or pipe schedule as the pipe being examined.

The following reducer to nozzle welds are affected:

Unit	Weld Identification	Unit	Weld Identification
PTP-3	26"-MSA-2301-1A	PTP-4	26"-MSA-2401-1A
	26"-MSB-2302-1A		26"-MSB-2402-1A
	26"-MSC-2302-1A		26"-MSC-2403-1A

See Figure No. 1 for typical configuration and material specifications for each identified weld.

D. BASIS FOR RELIEF:

1. Appendix III, paragraph III-3410, as written, would require a ultrasonic calibration block to essentially match either the nozzle or the reducer.

2. Configuration of the nozzle extension piece adjacent to the subject welds prohibit ultrasonic examination of the code required volume from the nozzle side.

3. Florida Power & Light Company feels that procurement and fabrication of a calibration block, soley for compliance with III-3410 of Appendix III for the six (6) nozzle to reducer welds will require large expenditures of manhours and cost with essentially no compensating increase in plant

safety.

4. The small difference in diameter (31" vs 26") will not affect the ultrasonic examination. ASME Section V, Article 5 has allowed a range of sizes, particularly in the case of diameters greater than 20 inches.

5. In lieu of utilizing a calibration block fabricated from the reducer material, (A-105 Class II, 1.5 inch wall) Florida Power & Light Company proposes to use a calibration block of 26 inch diameter, with a thickness of 1.5 inches wall material of suitably similar specifications with identical tensile properties and metallurigical structure.

6. The extent of examination volume achieved ultrasonically, coupled with the surface examination and the system pressure tests provide assurance of an acceptable level of quality and safety.

E. ALTERNATIVE EXAMINATIONS

1. Perform the code required examinations with the proposed ultrasonic calibration block.

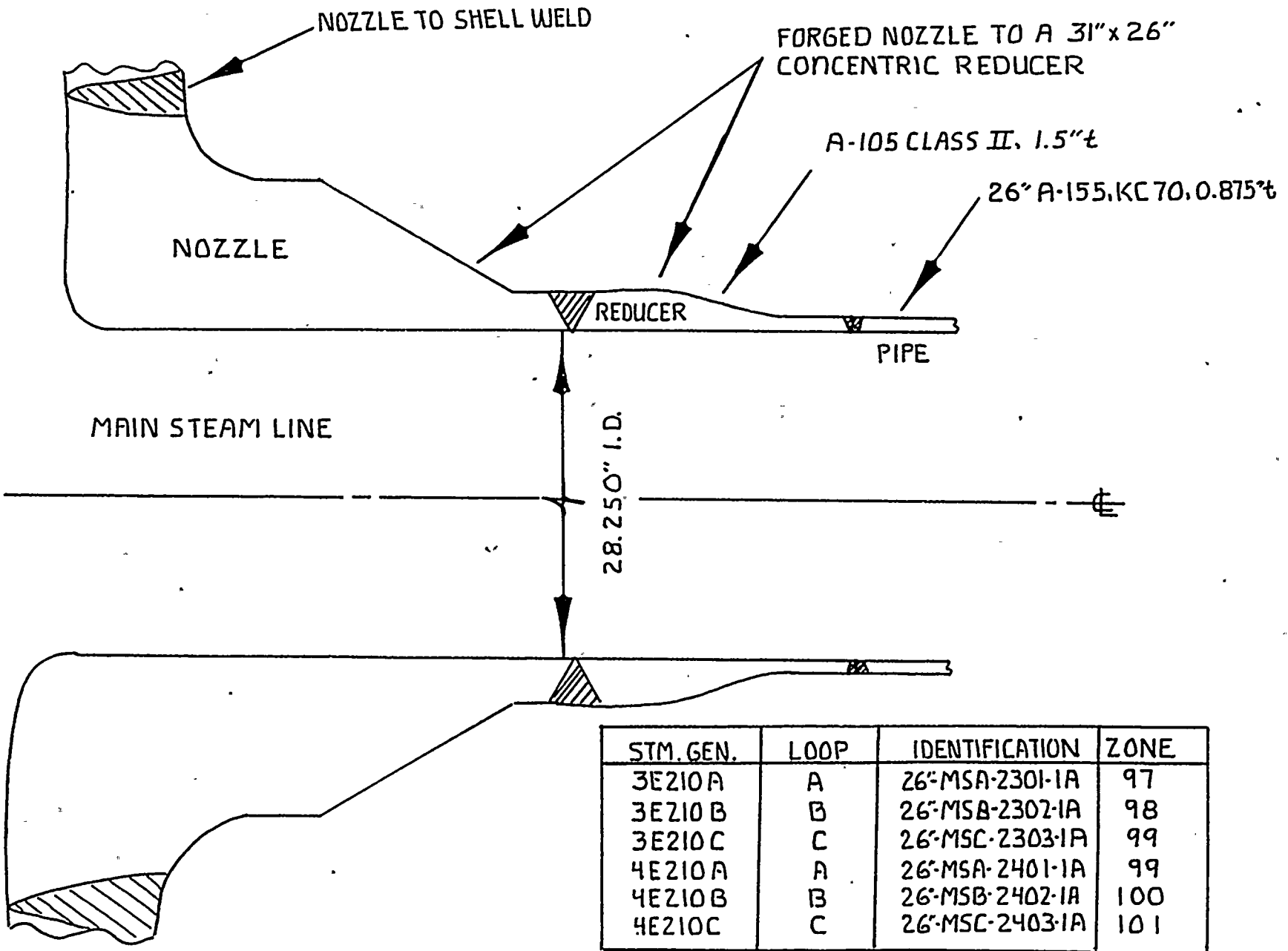
2. Perform the examinations per the ISI Table - IWC-2500-1.

F. IMPLEMENTATION SCHEDULE:

- Second Inspection Interval

G. ATTACHMENTS:

Figure No. 1 - Typical nozzle to reducer configuration.



STM. GEN.	LOOP	IDENTIFICATION	ZONE
3E210A	A	26"-MSA-2301-1A	97
3E210B	B	26"-MSB-2302-1A	98
3E210C	C	26"-MSC-2303-1A	99
4E210A	A	26"-MSA-2401-1A	99
4E210B	B	26"-MSB-2402-1A	100
4E210C	C	26"-MSC-2403-1A	101

RELIEF REQUEST NO. 14

AUTH	NO.	DATE	REVISION	BY	CH	DOC APP

DATE 6 NOV 85 | SCALE

FPL — FLORIDA POWER & LIGHT COMPANY

DR EL A | ER NO.
CH | COR
APPROVED L.E. Anderson

TURKEY POINT 3/4
REDUCER TO NOZZLE

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FIG. NO. 1

REV. NO. 0