

ATTACHMENT A

Turkey Point Unit No. 3

Section I

Valve Test Program

Section II

Pump Test Program

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the 1990s, the number of people in the world who are under 15 years of age is expected to increase from 1.1 billion to 1.5 billion. The number of people aged 65 and over is expected to increase from 200 million to 400 million. The number of people aged 15 and over is expected to increase from 3.5 billion to 4.5 billion. The number of people aged 15 and over is expected to increase from 3.5 billion to 4.5 billion. The number of people aged 15 and over is expected to increase from 3.5 billion to 4.5 billion.

ABSTRACT

The planned inservice inspection and testing programs were developed employing the R.G. 1.26, Revision 2, criteria for quality group classifications and standards (Quality Group A is the same as ASME Class 1, etc.).

Section I. Valve Test Program Outline

The valve test program shall be conducted in accordance with Subsection IWV of Section XI of the 1980 Edition of the ASME Boiler and Pressure Vessel Code thru Winter 1980 Addenda, except for specific relief requested in accordance with 10 CFR 50.55a (g) (5) (iii) which is identified in Subsections I.G. The period for this valve test program starts December 14, 1982, and ends December 14, 1992.

Section II. Pump Test Program Outline

The pump test program shall be conducted in accordance with Subsection IWP of Section XI of the 1980 Edition of the ASME Boiler and Pressure Vessel Code thru Winter 1980 Addenda, except for specific relief requested in accordance with 10 CFR 50.55a (g) (5) (iii) which is identified in Subsection II.A. The period for the pump test program starts December 14, 1982, and ends December 14, 1992.

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Section II.

Pump Test Program

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Relief Request Basis

I.A. LIST OF DRAWINGS

5610-M-420-3, REV. 8
(FPL NO. F-503184, REV. 7)

5610-M-470-5, REV. 8
(FPL NO. E-503185, REV. 7)

5610-M-450-57, REV. 9
(FPL NO. F-503187, REV. 7)

5610-M-450-57, REV. 9
(FPL NO. F-503188, REV. 7)

5610-M-500-28, REV. 6
(FPL NO. F-503189, REV. 8)

5610-M-410-91, REV. 7
(FPL NO. F-503191, REV. 6)

5610-M-480-1, REV. 9
(FPL NO. F-503193, REV. 7)

5610-M-450-53, REV. 8
(FPL NO. F-503194, REV. 6)

5610-M-450-54, REV. 6
(FPL NO. F-503195, REV. 4)

5610-M-1, REV. 14
(FPL NO. F-502027, REV. 14)

5610-M-2, REV. 18
(FPL NO. F-502028, REV. 15)

5610-M-4, REV. 18
(FPL NO. F-502030, REV. 14)

5610-M-5, REV. 17
(FPL NO. F-502031, REV. 14)

5610-M-7, REV. 10
(FPL NO. F-502033, REV. 8)

5610-M-10, REV. 18
(FPL NO. F-502036, REV. 14)

5610-M-11, REV. 11
(FPL NO. F-502037, REV. 100)

CHEMICAL & VOLUME CONTROL
SYSTEM (3 SHEETS)

SAFETY INJECTION SYSTEM
(4 SHEETS)

AUXILIARY COOLANT SYSTEM
COMPONENT COOLING (3 SHEETS)

AUXILIARY COOLANT SYSTEM
COMPONENT COOLING (4 SHEETS)

WASTE DISPOSAL SYSTEM
(2 SHEETS)

REACTOR COOLANT SYSTEM
(2 SHEETS)

SAMPLING SYSTEM

AUXILIARY COOLANT SYSTEM
RESIDUAL HEAT REMOVAL

AUXILIARY COOLANT SYSTEM
SPENT FUEL PIT COOLING SYSTEM

STEAM SYSTEM

CONDENSATE AND FEEDWATER
SYSTEMS

LUBE OIL SERVICE AND
INSTRUMENT AIR

CIRCULATING WATER, SALT
WATER AND CHLORINATION SYSTEMS
(INTAKE COOLING WATER SYSTEM)

DIESEL OIL

FIRE, PRIMARY MAKE-UP, CONTAINMENT
COOLING WATER AND CHEMICAL
INJECTION SYSTEMS

CONTAINMENT VENTILATION
SYSTEM



I.A. LIST OF DRAWINGS (CONT'D)

5610-M-12, REV. 9
(FPL NO. F-502038, REV. 10)

CONTAINMENT AND RADWASTE
DRAINS AND VENTS

I.B. LIST OF VALVE CATEGORIES (IWV-2200)

- Category A - Valves for which seat leakage is limited to a specific maximum amount in the closed position for fulfillment of their function.
- Category B - Valves for which seat leakage in the closed position is inconsequential for fulfillment of their function.
- Category C - Valves which are self-actuating in response to some system characteristic, such as pressure (relief valves) or flow direction (check valves).
- Category D - Valves which are actuated by an energy source capable of only one operation, such as rupture disks or explosive-actuated valves.

NOTE:

When more than one distinguishing category characteristic is applicable, all requirements of each of the individual categories are applicable, although duplication or repetition of common testing requirements is not necessary.

I.C. LIST OF DEFINITIONS

1. ACTIVE AND PASSIVE VALVES (IWV-2100)

- (a) ACTIVE VALVES - Valves which are required to change position to accomplish a specific function.
- (b) PASSIVE VALVES - Valves which are not required to change position to accomplish a specific function.

2. EXERCISING - Exercising is the demonstration, based on direct or indirect visual or other positive indication, that the valve exhibits the required change of disk position to fulfill its function.

- (a) FULL STROKE - is the valve stem or disc movement to the position required (to open or to close) to fulfill its function.
- (b) NORMALLY OPEN VALVE - verification of seating upon cessation or reversal of flow.
- (c) NORMALLY CLOSED VALVE - verification of opening upon cessation of pressure differential or initiation of flow or by mechanical force.

I.D. LIST OF VALVE TABLE SYMBOLS

VALVE NUMBER:

IDENTIFICATION

SIZE:

INCHES

TYPE:

GATE-GLOBE-CHECK-RELIEF-BALL

SAFE - SAFETY
DIAPH - DIAPHRAGM
BUTFY - BUTTERFLY
S/CHK - STOP CHECK
POWER - POWER ASSISTED CHECK
ASS'T
CHECK

ACTUATOR:

A/O - AIR OPERATOR
MO - ELECTRIC MOTOR OPERATOR
SO - SOLENOID OPERATOR
S/A, SA,
OR SELF - SELF ACTUATED

CODE CLASS:

1 - 2 - 3

CODE CATEGORY:

A - B - C (OR COMBINATION OF) SEE
TABLE A BELOW AND SUBSECTION I.B.

ACTIVE/PASSIVE:

A - P (SEE TABLE A BELOW)

NORMAL POSITION:

NO - NORMALLY OPEN
NC - NORMALLY CLOSED
LO - LOCKED OPEN
LC - LOCKED CLOSED

FAILURE MODE:

FO - FAIL OPEN
FC - FAIL CLOSED
FAI - FAIL AS IS

REMOTE POSITION
INDICATION:

YES - NO

TEST PERIOD:

1. REFUELING SHUTDOWN
2. COLD SHUTDOWN - SEE NOTE(S) 1
FOR DEFINITION UNDER SUB-SECTION
I.E. & F.
3. OPERATION - 3 MONTHS OR LESS
(CODE).

INSERVICE INSPECTION
(ISI) TESTS:

SEE APPROPRIATE LIST OF CATEGORY
LEGEND (SUB-SECTION I.E. & I.G.).

ASTERISK (*) - ONE (1) INSPECTION
INTERVAL (TEN YEARS).

I.D. LIST OF VALVE TABLE SYMBOLS (CONT'D)

RRB NO. NUMBER RELATES TO APPROPRIATE VALVE RELIEF REQUEST BASIS.

VALVE COORDINATE: LOCATION OF VALVE ON DRAWING.

REMARKS: RELATED TO SPECIAL ALTERNATE TESTING.

TABLE - A (TABLE IWV-3700-1) (2)

<u>VALVE CATEGORY</u>	<u>VALVE FUNCTION</u>	<u>CODE LEAK TEST</u>	<u>CODE EXERCISE TEST</u>	<u>SPECIAL TEST PROCEDURE</u>
A	ACTIVE	IWV-3420	IWV-3410	NONE
A	PASSIVE	IWV-3420	NONE	NONE
B	ACTIVE	NONE	IWV-3410	NONE
C - SAFETY AND RELIEF	ACTIVE	NONE	IWV-3510	NONE
C - CHECK (1)	ACTIVE	NONE	IWV-3520	NONE
D	ACTIVE	NONE	NONE	IWV-3600

NOTE: (1) Combination Category AC Check Valves shall be leak tested IWV-3420.

(2) No Tests required for Category B, C, and D passive valves.



I.E. LEGEND FOR TABLE I - TEST PARAMETERS TO CODE

CATEGORY A AND B VALVES

Exercising

- EF-1 Exercise valve (full stroke) for operability every 3 months (Code).
- EF-2 Exercise valve (full stroke) for operability during cold shutdown (Code).
- EF-3 Exercise valve (full stroke) for operability during refueling shutdown (Code).
- EF-4 Exercise valve (full stroke) for operability prior to return to service (Code).
- EF-5 Exercise valve with remote position indicator at least once every 2 years for verification that valve operation is accurately indicated. (Code)
- EF-7 Exercise valve (with Fail-Safe Actuators) to observe failure mode every 3 months (Code).
- EF-8 Exercise valve (with Fail-Safe Actuators) to observe failure mode during cold shutdown (Code).
- EF-9 Exercise valve (with Fail-Safe Actuators) to observe failure mode during refueling shutdown (Code).

Measurement of Full Stroke Time

- EST-1 Exercise valve - power operated (full stroke) and measure time (Code) (5 seconds - Max.) (FPL)
- EST-2 Exercise valve - power operated (full stroke) and measure time (Code) (10 seconds - Max.) (FPL)
- EST-3 Exercise valve - power operated (full stroke) and measure time (Code) (60 seconds - Max.) (FPL)
- EST-4 Exercise valve - power operated (full stroke) and measure time (Code) (120 seconds - Max.) (FPL)
- EST-5 Exercise valve - power operated (full stroke) and measure time (Code) (180 seconds - Max.) (FPL)
- EST-6 Exercise valve - power operated (full stroke) and measure time (Code) (15 seconds - Max.) (FPL)

I.E. LEGEND FOR TABLE I - TEST PARAMETERS TO CODE

CATEGORY A AND B VALVES

(Continued)

Valve Leak Rate Tests

SLT-1 Seat leakage test valve during refueling but less than every 2 years (Code).

CATEGORY C VALVES

Check Valves

EF-1 Exercise valve (full stroke) for operability every 3 months (Code).

EF-2 Exercise valve (full stroke) for operability during cold shutdown (Code).

EF-3 Exercise valve (full stroke) for operability during refueling shutdown (Code).

Safety and Relief Valves

TF-1 Safety and relief valve tests (Set Point) to ASME Table IWV-3510-1 (Code).

NOTES:

- 1). Cold Shutdown - ISI test scheduled for Test Period 2 (Cold Shutdown) shall commence no later than 48 hours after reaching Cold Shutdown conditions, or no later than 64 hours if Cold Shutdown conditions are reached between Friday 1600 hours and Monday 0800 hours. In the case of frequent Cold Shutdowns, valve testing will not be performed more often than once every three (3) months for Category A, B, and C valves. Valves that are not tested during a specified Cold Shutdown, due to plant startup, will be identified to assure their testing in the event of untimely Cold Shutdowns within the three (3) month time period. In any event, plant startup shall not be delayed to complete valve testing.
- 2). Corrective Action - Where a valve fails to meet the requirements of the program and/or the reference Code, the condition(s) shall be reviewed by the Plant nuclear Safety Committee for disposition and determination of whether it involves an unreviewed safety question prior to commencing with plant startup or continuing with plant operation.

I.E. LIST OF CATEGORY (A-B-C): LEGEND FOR TABLE I (CONT'D)

NOTES:

- 3) Test Period - Column: Where test period is denoted as 1 or 2, tests may be performed during either period, dependent upon plant conditions.



I.F. LIST OF CATEGORY A: TABLE I.A. - SEAT LEAKAGE TEST
PARAMETERS TO FPL REQUIREMENTS.

SEAT LEAKAGE RATES BASED ON AIR TESTS

50 PSI = DELTA P AT Pa

WHERE:

Pa = ACCIDENT PRESSURE

I.G. LIST OF CATEGORY (A-B-C): LEGEND FOR TABLE II -
TESTING TO CODE REQUIREMENTS DETERMINED TO BE
IMPRACTICAL AND RELIEF REQUESTED....PARAGRAPH
50.55a (G)5 (iii).

LEGEND - The LEGEND in Sub-Section I.E. applies
to this Table.

NOTES:

- 1) Notes 1, 2, and 3 of Sub-Section I.E. apply
to this Table.
- 2) Each valve in Table II is either
 - a) Partially tested to code or,
 - b) Relief requested and supported by Relief
Request Basis including Alternate Tests.



I.H. LIST OF VALVES EXEMPT FOR TESTING (IWV-1200)

TABLE III

- (a) Valves used only for operator convenience including:
 - o Vent Valves
 - o Drain Valves
 - o Instrument Valves
 - o Test Valves
 - o Valves used only for maintenance
 - o Valves used for system control (such as pressure regulating valves)
- (b) External control and protection systems responsible for sensing plant conditions and providing signals for valve operation.
- (c) Non-nuclear Safety Valves

NOTE: Valves listed in table III are not included in this report. They are identified and included in plant records.

II. PUMP TEST PROGRAM

II.A. Table IV - Test Parameters

This subsection outlines the pumps which are provided an emergency power source.

II.B. Test Interval

IWP-3400

III.C. Attachment A-2

Relief Request Basis

FLORIDA POWER & LIGHT COMPANY
TABLE I - TESTS TO CODE

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER	ISI TESTS	VALVE COORD	REMARKS
RV-3-551A	4	SAFB	S/A	1	C	A	NC	---	NO	1	TF-1	A-7	
RV-3-551B	4	SAFB	S/A	1	C	A	NC	---	NO	1	TF-1	A-7	
RV-3-551C	4	SAFB	S/A	1	C	A	NC	---	NO	1	TF-1	A-6	

FLORIDA POWER & LIGHT COMPANY
TABLE I - TESTS TO CODE

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER	ISI TESTS	VALVE COORD	REMARKS
3-333	3	GLOBE	MAN	2	A	P	NC	FAI	NO	1	SLT-1	C-17	

FLORIDA POWER & LIGHT COMPANY
TABLE I - TESTS TO CODE

VALVE. NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER	ISI TESTS	VALVE COORD	REMARKS
3-945E	1	CHECK	S/A	2	AC	P	NC	---	NO	1	SLT-1	C-9	
MOV-3-843A	4	GATE	MO	2	B	A	NC	FAI	YES	3 3 1	EF-1 EST-6 EF-5	C-13	
MOV-3-843B	4	GATE	MO	2	B	A	NC	FAI	YES	3 3 1	EF-1 EST-6 EF-5	C-13	
MOV-3-867A	4	GATE	MO	2	B	A	NC	FAI	YES	3 3 1	EF-1 EST-6 EF-5	C-13	
MOV-3-867B	4	GATE	MO	2	B	A	NC	FAI	YES	3 3 1	EF-1 EST-6 EF-5	C-13	
MOV-3-869	3	GATE	MO	2	B	A	NC	FAI	YES	3 3 1	EF-1 EST-3 EF-5	D-12	
MOV-3-880A	6	GATE	MO	2	A	A	NC	FAI	YES	3 3 1	EF-1 EST-6 EF-5	B-7	
MOV-3-880B	6	GATE	MO	2	A	A	NC	FAI	YES	3 3 1	EF-1 EST-6 EF-5	B-7	
3-895V	3/4	GLOBE	MAN	2	A	P	LC	FAI	NO	1	SLT-1	D-12	



FLORIDA POWER & LIGHT COMPANY
TABLE I - TESTS TO CODE

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER	ISI TESTS	VALVE COORD	REMARKS
3-741A	2	GLOBE	MAN	2	B	A	LO	PAI	NO	3	EF-1	D-11	

FLORIDA POWER & LIGHT COMPANY
TABLE I - TESTS TO CODE

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER	ISI TESTS	VALVE COORD	REMARKS
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NO TABLE I VALVES



FLORIDA POWER & LIGHT COMPANY
TABLE I - TESTS TO CODE

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER	ISI TESTS	VALVE COORD	REMARKS
3-702A	16	CHECK	S/A	3	C	A	NO	---	NO	3	EF-1	C-11	
3-702B	16	CHECK	S/A	3	C	A	NO	---	NO	3	EF-1	B-11	
3-702C	16	CHECK	S/A	3	C	A	NO	---	NO	3	EF-1	B-11	
MOV-3-749A	16	GATE	MO	3	B	A	NC	FAI	YES	3 3 1	EF-1 EST-5 EF-5	D-5	
MOV-3-749B	16	GATE	MO	3	B	A	NC	FAI	YES	3 3 1	EF-1 EST-5 EF-5	C-6	

FLORIDA POWER & LIGHT COMPANY
TABLE I - TESTS TO CODE

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER	ISI TESTS	VALVE COORD	REMARKS
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NO TABLE I VALVES

FLORIDA POWER & LIGHT COMPANY
TABLE I - TESTS TO CODE

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER	ISI TESTS	VALVE COORD	REMARKS
CV-3-2803	2	GLOBE	A/O	2	A	P	LO	FO	NO	1	SLT-1	C-8	

FLORIDA POWER & LIGHT COMPANY
TABLE I - TESTS TO CODE

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER	ISI TESTS	VALVE COORD	REMARKS
RV-3-1400	6	SAFE	S/A	2	C	A	NC	--	NO	1	TF-1	C-10	
RV-3-1401	6	SAFE	S/A	2	C	A	NC	--	NO	1	TF-1	C-9	
RV-3-1402	6	SAFE	S/A	2	C	A	NC	--	NO	1	TF-1	C-10	
RV-3-1403	6	SAFE	S/A	2	C	A	NC	--	NO	1	TF-1	C-9	
RV-3-1405	6	SAFE	S/A	2	C	A	NC	--	NO	1	TF-1	B-10	
RV-3-1406	6	SAFE	S/A	2	C	A	NC	--	NO	1	TF-1	B-10	
RV-3-1407	6	SAFE	S/A	2	C	A	NC	--	NO	1	TF-1	B-11	
RV-3-1408	6	SAFE	S/A	2	C	A	NC	--	NO	1	TF-1	B-10	
RV-3-1410	6	SAFE	S/A	2	C	A	NC	--	NO	1	TF-1	C-11	
RV-3-1411	6	SAFE	S/A	2	C	A	NC	--	NO	1	TF-1	C-11	
RV-3-1412	6	SAFE	S/A	2	C	A	NC	--	NO	1	TF-1	C-11	
RV-3-1413	6	SAFE	S/A	2	C	A	NC	--	NO	1	TF-1	C-10	



FLORIDA POWER & LIGHT COMPANY
TABLE-I - TESTS TO CODE

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER	ISI TESTS	VALVE COORD	REMARKS
MOV-3-1403	3	GATE	MO	2	B	A	NC	FAI	YES	3 3 1	EF-1 EST-3 EF-5	C-12	
MOV-3-1404	3	GATE	MO	2	B	A	NC	FAI	YES	3 3 1	EF-1 EST-3 EF-5	D-12	
MOV-3-1405	3	GATE	MO	2	B	A	NC	FAI	YES	3 3 1	EF-1 EST-3 EF-5	D-12	
3-10-083	4	CHECK	S/A	3	C	A	NC	---	NO	3	EF-1	E-12	
3-10-085	4	CHECK	S/A	3	C	A	NC	--	NO	3	EF-1	E-12	
3-10-087	4	CHECK	S/A	3	C	A	NC	--	NO	3	EF-1	F-12	
3-10-119	3	S/CHK	S/A	3	C	A	NC	--	NO	3	EF-1	C-12	
3-10-219	3	S/CHK	S/A	3	C	A	NC	--	NO	3	EF-1	D-12	
3-10-319	3	S/CHK	S/A	3	C	A	NC	--	NO	3	EF-1	D-12	
3-10-120	4	S/CHK	S/A	3	C	A	NC	--	NO	3	EF-1	C-12	
3-10-220	4	S/CHK	S/A	3	C	A	NC	--	NO	3	EF-1	D-12	
3-10-320	4	S/CHK	S/A	3	C	A	NC	--	NO	3	EF-1	D-12	



FLORIDA POWER & LIGHT COMPANY
TABLE I - TESTS TO CODE

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER	ISI TESTS	VALVE COORD	REMARKS
20-143	6	CHECK	S/A	3	C	A	NC	--	NO	3	EF-1	B-12	
20-243	6	CHECK	S/A	3	C	A	NC	--	NO	3	EF-1	C-12	
20-343	6	CHECK	S/A	3	C	A	NC	--	NO	3	EF-1	D-12	
3-20-140	4	CHECK	S/A	2	C	A	NC	--	NO	3	EF-1	B-10	
3-20-240	4	CHECK	S/A	2	C	A	NC	--	NO	3	EF-1	B-10	
3-20-340	4	CHECK	S/A	2	C	A	NC	--	NO	3	EF-1	C-11	
3-20-401	8	CHECK	S/A	3	C	A	NC	--	NO	3	EF-1	A-11	



FLORIDA POWER & LIGHT COMPANY
TABLE I - TESTS TO CODE

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE. CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER	ISI TESTS	VALVE COORD	REMARKS
3-50-311	24	CHECK	S/A	3	C	A	NO	--	NO	3	EF-1	F-3	
3-50-321	24	CHECK	S/A	3	C	A	NO	--	NO	3	EF-1	F-4	
3-50-331	24	CHECK	S/A	3	C	A	NO	--	NO	3	EF-1	F-5	



FLORIDA POWER & LIGHT COMPANY
TABLE I - TESTS TO CODE

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER	ISI TESTS	VALVE COORD	REMARKS
70-006A	2	CHECK	S/A	3	C	A	NC	---	NO	3	EF-1	B-4	
70-006B	2	CHECK	S/A	3	C	A	NC	---	NO	3	EF-1	B-4	



FLORIDA POWER & LIGHT COMPANY
TABLE I - TESTS TO CODE

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER	ISI TESTS	VALVE COORD	REMARKS
CV-3-2819	2	GLOBE	A/O	2	A	A	NC	FC	YES	3 3 3 1 1	EF-1 EF-7 EST-2 EF-5 SLT-1	D-2	
CV-3-2826	2	GLOBE	A/O	2	A	A	NC	FC	YES	3 3 3 1 1	EF-1 EF-7 EST-2 EF-5 SLT-1	D-1	



FLORIDA POWER & LIGHT COMPANY
TABLE I - TESTS TO CODE

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER	ISI. TESTS	VALVE COORD	REMARKS
CV-3-2821	3	GLOBE	A/O	2	A	A	NO	FC	YES	3 3 3 1 1	EF-1 EF-7 EST-2 SLT-1 EF-5	C-9	
CV-3-2822	3	GLOBE	A/O	2	A	A	NO	FC	YES	3 3 3 1 1	EF-1 EF-7 EST-2 SLT-1 EF-5	C-9	



FLORIDA POWER & LIGHT COMPANY
TABLE I - TESTS TO CODE

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND..	TEST PER	ISI TESTS	VALVE COORD	REMARKS
CV-3-2903	10	BUTFY	A/O	2	B	A	NO	FO	YES	3 3 3 1	EF-1 EF-7 EST-3 EF-5	A-8	
CV-3-2904	10	BUTFY	A/O	2	B	A	NO	FO	YES	3 3 3 1	EF-1 EF-7 EST-3 EF-5	B-8	
CV-3-2905	10	BUTFY	A/O	2	B	A	NO	FO	YES	3 3 3 1	EF-1 EF-7 EST-3 EF-5	B-8	
CV-3-2906	10	BUTFY	A/O	2	B	A	NC	FO	YES	3 3 3 1	EF-1 EF-7 EST-3 EF-5	A-11	
CV-3-2907	10	BUTFY	A/O	2	B	A	NC	FO	YES	3 3 3 1	EF-1 EF-7 EST-3 EF-5	B-11	
CV-3-2908	10	BUTFY	A/O	2	B	A	NC	FO	YES	3 3 3 1	EF-1 EF-7 EST-3 EF-5	C-11	

FLORIDA POWER & LIGHT COMPANY
TABLE I - TESTS TO CODE

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER	ISI TESTS	VALVE COORD	REMARKS
CV-3-2810	6	GLOBE	A/O	2	B	A	NO	FC	YES	3 3 3 1	EF-1 EF-7 EST-3 EF-5	A-11	
CV-3-2812	6	GLOBE	A/O	2	B	A	NO	FC	YES	3 3 3 1	EF-1 EF-7 EST-3 EF-5	B-11	
CV-3-2814	6	GLOBE	A/O	2	B	A	NO	FC	YES	3 3 3 1	EF-1 EF-7 EST-3 EF-5	B-11	

FLORIDA POWER & LIGHT COMPANY
TABLE I - TESTS TO CODE

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER	ISI TESTS	VALVE COORD	REMARKS
PCV-3-1014	1	GLOBE	A/O	2	A	A	NC	FC	NO	3 3 1	EF-1 EF-7 SLT-1	D-6	
CV-3-4658A	3/4	DIAPH	A/O	2	B	A	NO	FC	YES	3 3 3 1	EF-1 EF-7 EST-2 EF-5	C-7	
CV-3-4658B	3/4	DIAPH	A/O	2	A	A	NO	FC	YES	3 3 3 1 1	EF-1 EF-7 EST-2 SLT-1 EF-5	C-6	
CV-3-4659A	3/4	DIAPH	A/O	2	B	A	NO	FC	YES	3 3 3 1	EF-1 EF-7 EST-2 EF-5	C-7	
CV-3-4659B	3/4	DIAPH	A/O	2	A	A	NO	FC	YES	3 3 3 1 1	EF-1 EF-7 EST-2 SLT-1 EF-5	C-6	
CV-3-4668A	3	DIAPH	A/O	2	B	A	NO	FC	YES	3 3 3 1	EF-1 EF-7 EST-2 EF-5	B-7	
CV-3-4668B	3	DIAPH	A/O	2	A	A	NO	FC	YES	3 3 3 1 1	EF-1 EF-7 EST-2 EF-5 SLT-1	B-6	

FLORIDA POWER & LIGHT COMPANY
TABLE I - TESTS TO CODE

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER.	ISI TESTS	VALVE COORD.	REMARKS
POV-3-2600	48	BUTFY	A/O	2	A	P	NC	FC	YES	1	SLT-1	H-2	
POV-3-2601	48	BUTFY	A/O	2	A	P	NC	FC	YES	1	SLT-1	B-3	
POV-3-2602	54	BUTFY	A/O	2	A	P	NC	FC	YES	1	SLT-1	D-2	
POV-3-2603	54	BUTFY	A/O	2	A	P	NC	FC	YES	1	SLT-1	D-3	

FLORIDA POWER & LIGHT COMPANY
TABLE I - TESTS TO CODE

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL..	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER.	ISI TESTS	VALVE COORD,	REMARKS
3-10-567	2	CHECK	S/A	2	AC	P	NC	--	NO	1	SLT-1	D-6	

I.F. LIST OF CATEGORY A: TABLE I.A. - SEAT LEAKAGE TEST
PARAMETERS TO FPL REQUIREMENTS.

SEAT LEAKAGE RATES BASED ON AIR TESTS

50 PSI = DELTA P AT Pa

WHERE:

Pa = ACCIDENT PRESSURE

TURKEY POINT UNIT NO. 3

FLORIDA POWER & LIGHT COMPANY

TABLE I.A. - VALVE LEAKAGE RATES

PENE. NO.	VALVE NUMBER	LEAKAGE CC/MIN	PENE. NO.	VALVE NUMBER	LEAKAGE CC/MIN	PENE. NO.	VALVE NUMBER	LEAKAGE CC/MIN
33	SV-3-2913	2,000	17	3-895V	500	32	PAHM-3-001B	3,000
5	SV-3-6385	1,000	19A	MOV-3-880A	5,000	33	SV-3-2911	2,000
6	3-519	2,500	19B	MOV-3-880B	5,000	34	3-40-204	2,000
7	CV-3-519A	2,000	20	SV-3-6428	1,000	34	3-40-205	2,000
8	CV-3-956A	1,000	23	CV-3-2821	2,000	35	POV-3-2600	15,000
9	CV-3-956B	1,000	23	CV-3-2822	2,000	35	POV-3-2601	15,000
10	CV-3-4658B	500	24A	3-298A	2,000	36	POV-3-2602	15,000
10	PCV-3-1014	2,000	24B	3-298B	2,000	36	POV-3-2603	15,000
14	CV-3-200A	3,000	24C	3-298C	2,000	42	CV-3-855	500
14	CV-3-200B	3,000	25	MOV-3-381	2,000	47	3-10-567	4,000
14	CV-3-200C	3,000	25	MOV-3-6386	2,000	52	CV-3-4668B	2,000
14	CV-3-204	1,000	29	CV-3-2803	2,000	53	HV-3-4	1,000
15	HCV-3-121	2,000	29	3-40-336	4,000	53	PAHM-3-002B	3,000
15	3-333	2,000	31	CV-3-4659B	500	54A	MOV-3-861A	7,000
15	3-312C	4,000	32	3-11-003	2,000	54B	MOV-3-861B	7,000
16	HV-3-2	1,000	32	SV-3-2912	2,000	55	CV-3-956D	1,000
16	PAHM-3-002A	3,000	32	PAHM-3-001A	3,000	63	CV-3-2819	2,000
						63	CV-3-2826	2,000
						42	3-945E	3,000

SYSTEM TITLE: VARIOUS

PROGRAM TITLE: VALVE TEST PROGRAM

DWG. NO.: VARIOUS

I.G. LIST OF CATEGORY (A-B-C): LEGEND FOR TABLE II -
TESTING TO CODE REQUIREMENTS DETERMINED TO BE
IMPRACTICAL AND RELIEF REQUESTED....PARAGRAPH
50.55a (G)5 (iii).

LEGEND - The LEGEND in Sub-Section I.E. applies
to this Table.

NOTES:

- 1) Notes 1, 2, and 3 of Sub-Section I.E. apply
to this Table.
- 2) Each valve in Table II is either
 - a) Partially tested to code or,
 - b) Relief requested and supported by Relief
Request Basis including Alternate Tests.

FLORIDA POWER & LIGHT COMPANY
TABLE II - TO CODE AND RELIEF REQUEST

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER	ISI TESTS	RRB NO.	VALVE COORD	REMARKS
MOV-3-866A	2	GLOBE	MO	1	B	A	LC	FAI	YES	2 2 1	EF-2 EST-3 EF-5	6	D-15	
MOV-3-866B	2	GLOBE	MO	1	B	A	LC	FAI	YES	2 2 1	EF-2 EST-3 EF-5	6	D-15	
3-876A	8	CHECK	S/A	1	C	A	NC	--	NO	2	EF-2	7	B-15	
3-876B	8	CHECK	S/A	1	C	A	NC	--	NO	2	EF-2	7	A-13	
3-876C	8	CHECK	S/A	1	C	A	NC	--	NO	2	EF-2	7	A-11	
3-876D	8	CHECK	S/A	1	C	A	BC	--	NO	2	EF-2	8	A-13	
3-876E	8	CHECK	S/A	1	C	A	NC	--	NO	2	EF-2	8	A-11	

FLORIDA POWER & LIGHT COMPANY
TABLE II - TO CODE AND RELIEF REQUEST

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER	ISI TESTS	RRB NO.	VALVE COORD	REMARKS
SV-3-2911	1	GLOBE	SO	2	A	A	NO	FC	YES	3 3 3 1	EP-1 EP-7 EST-2 SLT-1	5	C-8	
SV-3-2912	1	GLOBE	SO	2	A	A	NO	FC	YES	3 3 3 1	EP-1 EP-7 EST-2 SLT-1	5	D-8	
SV-3-2913	1	GLOBE	SO	2	A	A	NO	FC	YES	3 3 3 1	EP-1 EP-7 EST-2 SLT-1	5	C-8	

FLORIDA POWER & LIGHT COMPANY
TABLE II - TO CODE AND RELIEF REQUEST

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER	ISI TESTS	RRB NO.	VALVE COORD	REMARKS
CV-3-519A	3	DIAPH	A/O	2	A	A	NC	FC	YES	2 2 2 1 1	EF-2 EF-8 EST-4 SLT-1 EF-5	1	A-12	
3-519	3/4	CHECK	S/A	2	AC	A	NC	--	NO	2 1	EF-2 SLT-1	2	A-11	
SV-3-6385	3/8	GLOBE	SO	2	A	A	NO	FC	YES	3 3 3 1 1	EF-1 EF-7 EST-2 SLT-1 EF-5	3 3	A-12	

FLORIDA POWER & LIGHT COMPANY
TABLE II - TO CODE AND RELIEF REQUEST

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER.	ISI TESTS	RRB NO.	VALVE COORD..	REMARKS
SV-3-6318A	1	GLOBE	SO	2	B	A	LC	FC	YES	2 2 2 1	EF-2 EF-8 EST-6 EF-5	4 4 4 4	A-8	
SV-3-6318B	1	GLOBE	SO	2	B	A	LC	FC	YES	2 2 2 1	EF-2 EF-8 EST-6 EF-5	4 4 4 4	A-8	
SV-3-6319A	1	GLOBE	SO	2	B	A	LC	FC	YES	2 2 2 1	EF-2 EF-8 EST-6 EF-5	5 5 5 5	A-9	
SV-3-6319B	1	GLOBE	SO	2	B	A	LC	FC	YES	2 2 2 1	EF-2 EF-8 EST-6 EF-5	5 5 5 5	A-9	
SV-3-6320A	1	GLOBE	SO	2	B	A	LC	FC	YES	2 2 2 1	EF-2 EF-8 EST-6 EF-5	5 5 5 5	A-9	
SV-3-6320B	1	GLOBE	SO	2	B	A	LC	FC	YES	2 2 2 1	EF-2 EF-8 EST-6 EF-5	5 5 5 5	A-9	

FLORIDA POWER & LIGHT COMPANY
TABLE II - TO CODE AND RELIEF REQUEST

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER	ISI TESTS	RRB NO.	VALVE COORD	REMARKS
CV-3-200A	2	GLOBE	A/O	1	A	A	NC	FC	YES	2 2 2 1 1	EF-2 EF-8 EST-2 SLT-1 EF-5	1	D-19	
CV-3-200B	2	GLOBE	A/O	1	A	A	NC	FC	YES	2 2 2 1 1	EF-2 EF-8 EST-2 SLT-1 EF-5	1	D-18	
CV-3-200C	2	GLOBE	A/O	1	A	A	NO	FC	YES	2 2 2 1 1	EF-2 EF-8 EST-2 SLT-1 EF-5	1	D-18	
CV-3-204	2	GLOBE	A/O	2	A	A	NO	FC	YES	2 2 2 1 1	EF-2 EF-8 EST-2 SLT-1 EF-5	2	D-17	
MOV-3-381	3	GATE	MO	2	A	A	NO	FAI	YES	2 2 1 1	EF-2 EST-6 SLT-1 EF-5	3	B-16	
MOV-3-6386	3	GATE	MO	2	A	A	NO	FAI	YES	2 2 1 1	EF-2 EST-6 SLT-1 EF-5	3	B-16	

FLORIDA POWER & LIGHT COMPANY
TABLE II - TO CODE AND RELIEF REQUEST

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER	ISI TESTS	RRB NO.	VALVE COORD	REMARKS
HCV-3-121	3	GLOBE	A/O	2	A	A	NO	FO	NO	2 2 1	EF-2 EF-8 SLT-1	5	C-17	
CV-3-310A	3	GLOBE	A/O	1	B	A	NO	FO	YES	2 2 2 1	EF-2 EF-8 EST-3 EF-5	6	C-19	
CV-3-310B	3	GLOBE	A/O	1	B	A	NC	FO	YES	2 2 2 1	EF-2 EF-8 EST-3 EF-5	6	C-19	
LCV-3-115C	4	GATE	MO	2	B	A	NO	FAI	YES	2 2 1	EF-2 EST-3 EF-5	7	C-14	

FLORIDA POWER & LIGHT COMPANY
TABLE II - TO CODE AND RELIEF REQUEST

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER	ISI TESTS	RRB NO.	VALVE COORD	REMARKS
LCV-3-115B	4	BUTPY	A/O	2	B	A	NC	FC	YES	2 2 2 1	EF-2 EF-8 EST-6 EF-5	8	A-14	
MOV-3-350	2	GATE	MO	2	B	A	NC	FAI	YES	2 2 1	EF-2 EST-3 EF-5	9	A-12	
3-312A	3	CHECK	S/A	1	C	A	NC	--	NO	2	EF-2	10	C-19	
3-312B	3	CHECK	S/A	1	C	A	NC	--	NO	2	EF-2	10	C-19	
3-351	2	CHECK	S/A	2	C	A	NC	--	NO	2	EF-2	11	A-12	
3-357	4	CHECK	S/A	2	C	A	NC	--	NO	2	EF-2	12	A-13	

FLORIDA POWER & LIGHT COMPANY
TABLE II - TO CODE AND RELIEF REQUEST

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER	ISI TESTS	RRB NO.	VALVE COORD	REMARKS
3-298A	2	CHECK	S/A	1	AC	A	NO	--	NO	1 1	EF-3 SLT-1	13	A-20	
3-298B	2	CHECK	S/A	1	AC	A	NO	--	NO	1 1	EF-3 SLT-1	13	A-19	
3-298C	2	CHECK	S/A	1	AC	A	NO	--	NO	1 1	EF-3 SLT-1	13	A-18	
3-312C	3	CHECK	S/A	1	AC	A	NO	--	NO	1 1	EF-3 SLT-1	14	C-17	

FLORIDA POWER & LIGHT COMPANY
TABLE II - TO CODE AND RELIEF REQUEST

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER	ISI TESTS	RRB NO.	VALVE COORD	REMARKS
MOV-3-860A	14	GATE	MO	2	B	A	NC	FAI	YES	2 2 1	EF-2 EST-4 EF-5	1	A-9	
MOV-3-860B	14	GATE	MO	2	B	A	NC	FAI	YES	2 2 1	EF-2 EST-4 EF-5	1	A-9	
MOV-3-861A	14	GATE	MO	2	A	A	NC	FAI	YES	2 2 1 1	EF-2 EST-4 SLT-1 EF-5	2	A-8	
MOV-3-861B	14	GATE	MO	2	A	A	NC	FAI	YES	2 2 2 1	EF-2 EST-4 SLT-1 EF-5	2	A-8	
MOV-3-863A	8	GATE	MO	2	B	A	LC	FAI	YES	2 2 1	EF-2 EST-3 EF-5	3	B-8	
MOV-3-863B	8	GATE	MO	2	B	A	LC	FAI	YES	2 2 1	EF-2 EST-3 EF-5	3	B-8	
MOV-3-872	8	GATE	MO	2	B	A	NC	FAI	YES	2 2 1	EF-2 EST-3 EF-5	4	A-7	
CV-3-855	1	GLOBE	A/O	2	A	A	NC	FC	YES	2 2 2 1 1	EF-2 EF-8 EST-2 SLT-1 EF-5	5	C-9	

FLORIDA POWER & LIGHT COMPANY
TABLE II - TO CODE AND RELIEF REQUEST

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER.	ISI TESTS	RRB NO.	VALVE COORD.	REMARKS
879A	3	CHECK	S/A	2	C	A	NC	---	NO	3	EF-1	19	D-7	
879B	3	CHECK	S/A	2	C	A	NC	---	NO	3	EF-1	19	C-7	
879C	3	CHECK	S/A	2	C	A	NC	---	NO	3	EF-1	19	C-7	
879D	3	CHECK	S/A	2	C	A	NC	---	NO	3	EF-1	19	C-7	
3-875A	10	CHECK	S/A	1	C	A	NC	---	NO	2	EF-2	9	A-16	
3-875B	10	CHECK	S/A	1	C	A	NC	---	NO	2	EF-2	9	A-17	
3-875C	10	CHECK	S/A	1	C	A	NC	---	NO	2	EF-2	9	A-17	

FLORIDA POWER & LIGHT COMPANY
TABLE II - TO CODE AND RELIEF REQUEST

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER.	ISI TESTS	RRB NO.	VALVE COORD.	REMARKS
MOV-3-865A	10	GATE	MO	2	B	P	LO	FAI	YES	---	---		B-15	TABLE INV-3700-1
MOV-3-865B	10	GATE	MO	2	B	P	LO	FAI	YES	---	---		B-13	TABLE INV-3700-1
MOV-3-865C	10	GATE	MO	2	B	P	LO	FAI	YES	---	---		B-11	TABLE INV-3700-1



FLORIDA POWER & LIGHT COMPANY
TABLE II - TO CODE AND RELIEF REQUEST

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER.	ISI TESTS	RRB NO.	VALVE COORD.	REMARKS
MOV-878A	4	GATE	MO	2	B	A	NO	FAI	YES	1 1 1	EP-3 EST-3 EP-5	10	C-7	
MOV-878B	4	GATE	MO	2	B	A	NO	FAI	YES	1 1 1	EP-3 EST-3 EP-5	10	C-7	
MOV-3-864A	16	GATE	MO	2	B	A	LO	FAI	YES	1 1 1	EP-3 EST-4 EP-5	11	D-2	
MOV-3-864B	16	GATE	MO	2	B	A	LO	FAI	YES	1 1 1	EP-3 EST-4 EP-5	11	D-2	
MOV-3-862A	14	GATE	MO	2	B	A	LO	FAI	YES	1 1 1	EP-3 EST-4 EP-5	12	A-5	
MOV-3-862B	14	GATE	MO	2	B	A	LO	FAI	YES	1 1 1	EP-3 EST-4 EP-5	12	A-5	
SV-3-2905	2	GATE	SO	2	B	A	NC	FAI	NO	1	EP-3	13	C-10	
SV-3-2906	2	GATE	SO	2	B	A	NC	FAI	NO	1	EP-3	13	C-10	
SV-3-2907	2	GATE	SO	2	B	A	NC	FAI	NO	1	EP-3	13	C-9	

FLORIDA POWER & LIGHT COMPANY
TABLE II - TO CODE AND RELIEF REQUEST

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER.	ISI TESTS	RRB NO.	VALVE COORD.	REMARKS
SV-3-2908	2	GATE	SO	2	B	A	NC	FAI	NO	1	EF-3	13	C-9	
SV-3-2909	2	GATE	SO	2	B	A	NC	FAI	NO	1	EF-3	13	C-9	
SV-3-2910	2	GATE	SO	2	B	A	NC	FAI	NO	1	EF-3	13	C-9	
3-2918	2	CHECK	S/A	2	C	A	NC	--	NO	*	*	14	B-10	*SEE ALTER- NATE TESTING IN REQUEST FOR RELIEF BASIS.
3-2919	2	CHECK	S/A	2	C	A	NC	--	NO	*	*	14	B-9	
3-2920	2	CHECK	S/A	2	C	A	NC	--	NO	*	*	14	B-9	
3-2921	2	CHECK	S/A	2	C	A	NC	--	NO	*	*	14	B-10	
3-2922	2	CHECK	S/A	2	C	A	NC	--	NO	*	*	14	B-9	
3-2923	2	CHECK	S/A	2	C	A	NC	--	NO	*	*	14	B-9	
3-874A	2	CHECK	S/A	1	C	A	NC	--	NO	1	EF-3	15	D-17	
3-874B	2	CHECK	S/A	1	C	A	NC	--	NO	1	EF-3	15	D-17	

FLORIDA POWER & LIGHT COMPANY
TABLE II - TO CODE AND RELIEF REQUEST

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER.	ISI TESTS	RRB NO.	VALVE COORD.	REMARKS
3-873A	2	CHECK	S/A	1	C	A	NC	--	NO	1	EF-3	16	C-15	
3-873B	2	CHECK	S/A	1	C	A	NC	--	NO	1	EF-3	16	C-15	
3-873C	2	CHECK	S/A	1	C	A	NC	--	NO	1	EF-3	16	C-14	
3-875D	10	CHECK	S/A	1	C	A	NC	--	NO	1	EF-3	17	B-15	
3-875E	10	CHECK	S/A	1	C	A	NC	--	NO	1	EF-3	17	B-13	
3-875F	10	CHECK	S/A	1	C	A	NC	--	NO	1	EF-3	17	B-11	
3-890A	6	CHECK	S/A	2	C	A	NC	--	NO	*	*	14	B-8	*SEE ALTER- NATE TESTING IN REQUEST FOR RELIEF BASIS.
3-890B	6	CHECK	S/A	2	C	A	NC	--	NO	*	*	14	B-8	

FLORIDA POWER & LIGHT COMPANY
TABLE II -- TO CODE AND RELIEF REQUEST

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM: POS. IND.	TEST PER.	ISI TESTS	RRB NO.	VALVE COORD.	REMARKS
CV-3-739	3	GLOBE	A/O	2	B	A	NC	FC	YES	2 2 2 1	EF-2 EF-8 EST-2 EF-5	1	B-13	
3-738	3	CHECK	S/A	2	C	A	NC	--	NO	2	EF-2	2	A-17	
MOV-3-716A	6	GATE	MO	3	B	A	NO	FAI	YES	2 2 1	EF-2 EST-6 EF-5	3	B-18	
MOV-3-716B	6	GATE	MO	2	B	A	NO	FAI	YES	2 2 1	EF-2 EST-6 EF-5	4	B-17	
MOV-3-730	6	GATE	MO	2	B	A	NO	FAI	YES	2 2 1	EF-2 EST-6 EF-5	5	C-13	
FCV-3-626	3	GATE	MO	2	B	A	NO	FAI	YES	2 2 1	EF-2 EST-6 EF-5	6	B-13	



FLORIDA POWER & LIGHT COMPANY
TABLE II - TO CODE AND RELIEF REQUEST

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER.	ISI TESTS	RRB NO.	VALVE COORD.	REMARKS
MOV-3-751	14	GATE	MO	1	B	P	LC	FAI	YES	---	---	3	C-5	TABLE I WV-3700-1
MOV-3-750	14	GATE	MO	1	B	P	NC	FAI	YES	---	---		B-5	TABLE I WV-3700-1
HCV-3-758	12	BUTFY	A/O	2	B	P	LO	FO	NO	---	---		G-11	TABLE I WV-3700-1



FLORIDA POWER & LIGHT COMPANY
TABLE II - TO CODE AND RELIEF REQUEST

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER.	ISI TESTS	RRB NO.	VALVE COORD.	REMARKS
MOV-3-744A	10	GATE	MO	2	B	A	NC	FAI	YES	2 2 1	EF-2 EST-** EF-5	1	B-12	**=24 SEC
MOV-3-744B	10	GATE	MO	2	B	A	NC	FAI	YES	2 2 1	EF-2 EST-** EF-5	1	B-12	**=24 SEC
3-753A	10	CHECK	S/A	2	C	A	NC	---	NO	2	EF-2	2	F-7	
3-753B	10	CHECK	S/A	2	C	A	NC	---	NO	2	EF-2	2	H-7	

FLORIDA POWER & LIGHT COMPANY
TABLE II - TO CODE AND RELIEF REQUEST

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER.	ISI TESTS	RRB NO.	VALVE COORD.	REMARKS
CV-3-956A	3/8	GLOBE	A/O	2	A	A	NC	FC	YES	2 2 2 1 1	EF-2 EF-8 EST-2 SLT-1 EF-5	1	H-11	
CV-3-956B	3/8	GLOBE	A/O	2	A	A	NC	FC	YES	2 2 2 1 1	EF-2 EF-8 EST-2 SLT-1 EF-5	1	H-11	
SV-3-6428	3/8	GLOBE	SO	2	A	A	NC	FC	YES	2 2 2 1 1	EF-2 EF-8 EST-2 SLT-1 EF-5	1 2	G-11	
CV-3-956D	3/8	GLOBE	A/O	2	A	A	NC	FC	YES	2 2 2 1 1	EF-2 EF-8 EST-2 SLT-1 EF-5	1	F-11	



FLORIDA POWER & LIGHT COMPANY
TABLE II - TO CODE AND RELIEF REQUEST

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER.	ISI TESTS	RRB NO.	VALVE COORD.	REMARKS
POV-3-2604	26	POWER ASST'D CHECK	A/CYL	2	C	A	NO	FC	YES	2 2 2 1	EF-2 EF-8 EST-1 EF-5	1	B-9	
POV-3-2605	26	POWER ASST'D CHECK	A/CYL	2	C	A	NO	FC	YES	2 2 2 1	EF-2 EF-8 EST-1 EF-5	1	B-10	
POV-3-2606	26	POWER ASST'D CHECK	A/CYL	2	C	A	NO	FC	YES	2 2 2 1	EF-2 EF-8 EST-1 EF-5	1	B-11	

FLORIDA POWER & LIGHT COMPANY
TABLE II - TO CODE AND RELIEF REQUEST

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER.	ISI TESTS	RRB NO.	VALVE COORD.	REMARKS
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NO TABLE II VALVES

FLORIDA POWER & LIGHT COMPANY
TABLE II - TO CODE AND RELIEF REQUEST

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER.	ISI TESTS	RRB NO.	VALVE COORD.	REMARKS
MOV-3-1425	1	GATE	MO	2	B	A	NO	FAI	YES	2 2 1	EF-2 EST-3 EF-5	1	E-11	
MOV-3-1426	1	GATE	MO	2	B	A	NO	FAI	YES	2 2 1	EF-2 EST-3 EF-5	1	F-11	
MOV-3-1427	1	GATE	MO	2	B	A	NO	FAI	YES	2 2 1	EF-2 EST-3 EF-5	1	C-5	
CV-3-6275A	2	GLOBE	A/O	2	B	A	NO	FC	YES	2 2 1	EF-8 EST-6 EF-5	2	C-10	
CV-3-6275B	2	GLOBE	A/O	2	B	A	NO	FC	YES	2 2 1	EF-8 EST-6 EF-5	2	C-10	
CV-3-6275C	2	GLOBE	A/O	2	B	A	NO	FC	YES	2 2 1	EF-8 EST-6 EF-5	2	C-11	
CV-3-2900	14	CHECK	A/O	2	C	A	NO	--	NO	2	EF-2	3	D-7	
CV-3-2901	14	CHECK	A/O	2	C	A	NO	--	NO	2	EF-2	3	D-8	
CV-3-2902	14	CHECK	A/O	2	C	A	NO	--	NO	2	EF-2	3	D-9	



FLORIDA POWER & LIGHT COMPANY
TABLE II - TO CODE AND RELIEF REQUEST

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER.	ISI TESTS	RRB NO.	VALVE COORD.	REMARKS
CV-3-2816	4	GLOBE	A/O	2	B	A	NC	FC	NO	3 3	EF-1 EF-7	4	B-10	
CV-3-2817	4	GLOBE	A/O	2	B	A	NC	FC	NO	3 3	EF-1 EF-7	4	B-11	
CV-3-2818	4	GLOBE	A/O	2	B	A	NC	FC	NO	3 3	EF-1 EF-7	4	C-11	
CV-3-2831	4	GLOBE	A/O	2	B	A	NC	FC	NO	3 3	EF-1 EF-7	4	B-10	
CV-3-2832	4	GLOBE	A/O	2	B	A	NC	FC	NO	3 3	EF-1 EF-7	4	B-11	
CV-3-2833	4	GLOBE	A/O	2	B	A	NC	FC	NO	3 3	EF-1 EF-7	4	C-11	

FLORIDA POWER & LIGHT COMPANY
TABLE II - TO CODE AND RELIEF REQUEST

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER.	ISI TESTS	RRB NO.	VALVE COORD.	REMARKS
3-40-204	2	GATE	MAN	2	A	A	LC	FAI	NO	2 1	EF-2 SLT-1	1	A-10	
3-40-205	2	CHECK	S/A	2	AC	A	NC	--	NO	2 1	EF-2 SLT-1	2	A-11	
3-40-203	2	GATE	MAN	2	B	A	LC	FAI	NO	2	EF-2	3	A-10	
3-40-336	2	CHECK	S/A	2	AC	A	NO	--	NO	1 1	EF-3 SLT-1	4	C-8	

FLORIDA POWER & LIGHT COMPANY
TABLE II - TO CODE AND RELIEF REQUEST

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER.	ISI TESTS	RRB NO.	VALVE COORD.	REMARKS
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NO TABLE II VALVES

FLORIDA POWER & LIGHT COMPANY
TABLE II -- TO CODE AND RELIEF REQUEST

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM: POS. IND.	TEST PER.	ISI TESTS	RRB NO.	VALVE COORD.	REMARKS
CV-2046A	2	GLOBE	A/O	3	B	A	NC	--	NO	3	EF-1	2	C-3	
CV-2046B	2	GLOBE	A/O	3	B	A	NC	--	NO	3	EF-1	2	C-5	
SV-3522A	1 1/2	GLOBE	SO	3	B	A	NC	--	NO	3	EF-1	1	D-4	
SV-3522B	1 1/2	GLOBE	SO	3	B	A	NC	--	NO	3	EF-1	1	D-5	

FLORIDA POWER & LIGHT COMPANY
TABLE II - TO CODE AND RELIEF REQUEST

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER.	ISI TESTS	RRB NO.	VALVE COORD.	REMARKS
MOV-3-1417	10	GATE	MO	2	B	A	NO	FAI	YES	2 2 1	EF-2 EST-4 EF-5	1	B-8	
MOV-3-1418	10	GATE	MO	2	B	A	NO	FAI	YES	2 2 1	EF-2 EST-4 EF-5	1	C-10	

FLORIDA POWER & LIGHT COMPANY
TABLE II - TO CODE AND RELIEF REQUEST

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER.	ISI TESTS	RRB NO.	VALVE COORD.	REMARKS
HV-3-1	2	DIAPH	MAN	2	B	A	LC	FAI	NO	2	EF-2	1	F-10	
HV-3-2	2	DIAPH	MAN	2	A	A	LC	FAI	NO	2 1	EF-2 SLT-1	2	F-10	
HV-3-3	2	DIAPH	MAN	2	B	A	LC	FAI	NO	2	EF-2	1	F-10	
HV-3-4	2	DIAPH	MAN	2	A	A	LC	FAI	NO	2 1	EF-2 SLT-1	2	F-10	

FLORIDA POWER & LIGHT COMPANY
TABLE II - TO CODE AND RELIEF REQUEST

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER.	ISI TESTS	RRB NO.	VALVE COORD.	REMARKS
3-11-003	2	CHECK	S/A	2	A/C	A	NO	--	NO	1 1	EF-3 SLT-1	3	D-7	
PAHM-3-001A	1	BALL	MAN	2	A	A	NC	FAI	NO	2 .1	EF-2 SLT-1	2	D-8	
PAHM-3-001B	1	BALL	MAN	2	A	A	NC	FAI	NO	2 1	EF-2 SLT-1	2	D-8	
PAHM-3-002A	3/4	BALL	MAN	2	A	A	NC	FAI	NO	2 1	EF-2 SLT-1	4	F-10	
PAHM-3-002B	3/4	BALL	MAN	2	A	A	NC	FAI	NO	2 1	EF-2 SLT-1	4	F-10	



FLORIDA POWER & LIGHT COMPANY
TABLE II - TO CODE AND RELIEF REQUEST

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER.	ISI TESTS	RRB NO.	VALVE COORD.	REMARKS
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NO TABLE II VALVES

FLORIDA POWER & LIGHT COMPANY
TABLE II - TO CODE AND RELIEF REQUEST

VALVE NUMBER	SIZE	TYPE	ACTU.	CODE CL.	CODE CAT.	ACT/ PAS	NORM. POS.	FAIL- URE MODE	REM. POS. IND.	TEST PER.	ISI TESTS	RRB NO.	VALVE COORD.	REMARKS
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NO TABLE II VALVES

ATTACHMENT A-1

TURKEY POINT UNIT NO. 3

RELIEF REQUEST BASIS

I.I. RELIEF REQUEST BASIS - ATTACHMENT A-1 CODE REQUIREMENTS
DETERMINED TO BE IMPRACTICAL....PARAGRAPH 50.55a (g) 5 (iii)
AND RELIEF REQUESTED.

Chemical and Volume Control System	Pg 1 to 8
Safety Injection System	Pg. 1 to 12
Auxiliary Coolant System Component Cooling	Pg. 1 to 3
Reactor Coolant System	Pg. 1 to 4
Sampling System	Pg. 1 to 1
Auxiliary Coolant System Residual Heat Removal	Pg. 1 to 2
Steam System	Pg. 1 to 1
Condensate and Feedwater Systems	Pg. 1 to 2
Lube Oil Service and Instrument Air	Pg. 1 to 3
Primary Make-up Containment Cooling Water and Chemical Injection Systems	Pg. 1 to 1
Containment Ventilation System	Pg. 1 to 3
Diesel Oil System	Pg. 1 to 1

RELIEF REQUEST BASIS

SYSTEM: Chemical and Volume Control

1. Valve: CV-3-200A, CV-3-200B, CV-3-200C
Category: A
Class: 1

Function: Provides parallel letdown flow paths through the letdown orifices to control Chemical and Volume Control System letdown flow rate.

Test Requirement: IWV-3410

Basis for Relief: Testing these valves during plant operation would cause an unbalanced flow condition in the Chemical and Volume Control System. This could interrupt flow to the Reactor Coolant Pump Controlled Leakage Seal System, which could result in damage to the Reactor Coolant pumps; thereby placing the plant in an unsafe mode of operation.

Alternate Testing: These valves will be tested during cold shutdowns.

2. Valve: CV-3-204
Category: A
Class: 2

Function: Provides the letdown flowpath during plant operation.

Test Requirement: IWV-3410

Basis for Relief: Testing this valve during plant operation would cause an unbalanced flow condition in the Chemical and Volume Control System. This would interrupt flow to the Reactor Coolant Pump Controlled Leakage Seal System. This could result in damage to the Reactor Coolant pumps; thereby, placing the plant in an unsafe mode of operation. The loss of the letdown flow path will result in the loss of the regenerative heat exchanger function. This could subject the Reactor Coolant System piping to thermal shock due to cooler charging return flow from the Chemical and Volume Control System.

Alternate Testing: This valve will be tested during cold shutdowns..



RELIEF REQUEST BASIS

SYSTEM: Chemical and Volume Control

3. Valve: MOV-3-381 and MOV-3-6386
Category: A
Class: 2

Function: Provides the Reactor Coolant Pump seal injection return flow path to the Chemical and Volume Control System Volume Control Tank. In addition, provides the excess letdown flow path from the Reactor Coolant System to the Chemical and Volume Control System Control Tank.

Test Requirement: IWV-3410

Basis for Relief: Testing this valve during plant operation would interrupt flow to the Reactor Coolant Pump Controlled Leakage Seal System, which could result in damage to the Reactor Coolant pumps; thereby, placing the plant in an unsafe mode of operation

Alternate Testing: This valve will be tested during cold shutdowns.

RELIEF REQUEST BASIS

SYSTEM: Chemical and Volume Control

5. Valve: HCV-3-121
Category: A
Class: 2

Function: Provides the charging flow path to the Reactor Coolant System. This valve is used to proportion flow between the seal injection supply to the Reactor Coolant pump Controlled Leakage Seal System and the charging flow to the Reactor Coolant System.

Test Requirement: IWV-3410

Basis for Relief: Testing this valve during plant operation would cause an unbalanced flow condition in the Chemical and Volume Control System. This could interrupt flow to the Reactor Coolant Pump Controlled Leakage Seal System, which could result in damage to the Reactor Coolant pumps; thereby, placing the plant in an unsafe mode of operation.

Alternate Testing: This valve will be tested during cold shutdowns.

6. Valve: CV-3-310A and CV-3-310B
Category: B
Class: 1

Function: Provides redundant charging flow paths to the Reactor Coolant System.

Test Requirement: IWV-3410

Basis for Relief: Testing these valves during plant operation would cause an unbalanced flow condition in the Chemical and Volume Control System. This could interrupt flow to the Reactor Coolant Pump Controlled Leakage Seal System, which could result in damage to the Reactor Coolant pumps; thereby, placing the plant in an unsafe mode of operation.

Alternate Testing: These valves will be tested during cold shutdowns.



RELIEF REQUEST BASIS

SYSTEM: Chemical and Volume Control

7. Valve: LCV-3-115C
Category: B
Class: 2

Function: Provides the flow path from the Volume Control Tank to the charging pump suction header.

Test Requirement: IWV-3410

Basis for Relief: Testing this valve during plant operation would cause an unbalanced flow condition in the Chemical and Volume Control System. This would interrupt flow to the Reactor Coolant Pump Controlled Leakage Seal System, which could result in damage to the Reactor pump; thereby, placing the plant in an unsafe mode of operation. Further, the failure of this valve in the closed position, by testing during plant operation, would isolate normal charging pump make-up.

Alternate Testing: This valve will be tested during cold shutdowns.



RELIEF REQUEST BASIS

SYSTEM: Chemical and Volume Control

8. Valve: LCV-3-115B
Category: B
Class: 2

Function: Provides a flow path from the refueling water storage tank to the Reactor Coolant System.

Test Requirement: IWV-3410

Basis for Relief: Testing this valve during plant operation would result in the addition of Boron to the Reactor Coolant System. This could place the plant in an unsafe mode of operation.

Alternate Testing: This valve will be tested during cold shutdowns.

9. Valve: MOV-3-350
Category: B
Class: 2

Function: Provides a flow path from the Boric Acid Storage Tanks to the Reactor Coolant System.

Test Requirement: IWV-3410

Basis for Relief: Testing this valve during plant operation would result in the addition of Boron to the Reactor Coolant System. This could place the plant in an unsafe mode of operation.

Alternate Testing: This valve will be tested during cold shutdowns.



RELIEF REQUEST BASIS

SYSTEM: Chemical and Volume Control

10. Valve: 3-312A and 3-312B
Category: C
Class: 1

Function: Prevents reverse flow from the Reactor Coolant System to the Chemical and Volume Control System charging flow path.

Test Requirement: IWV-3520

Basis for Relief: Testing these valves during plant operation would cause an unbalanced flow condition in the Chemical and Volume Control System. This could interrupt flow to the Reactor Coolant Pump Controlled Leakage Seal System, which could result in damage to the Reactor Coolant pumps; thereby, placing the plant in an unsafe mode of operation.

Alternate Testing: These valves will be tested during cold shutdowns.

11. Valve: 3-351
Category: C
Class: 2

Function: Prevents reverse flow from the charging pump suction header to the Boron Addition System.

Test Requirement: IWV-3520

Basis for Relief: Testing this valve during plant operation would result in the addition of Boron to the Reactor Coolant System. This could place the plant in an unsafe mode of operation.

Alternate Testing: This valve will be tested during cold shutdowns.



RELIEF REQUEST BASIS

SYSTEM: Chemical and Volume Control

12. Valve: 3-357
Category: C
Class: 2

Function: Prevents reverse flow from the charging pump suction header to the Refueling Water Storage Tank system.

Test Requirement: IWV-3520

Basis for Relief: Testing this valve during plant operation would result in the addition of Boron to the Reactor Coolant System. This could place the plant in an unsafe mode of operation.

Alternate Testing: This valve will be tested during cold shutdowns.

13. Valve: 3-298A, 3-298B, and 3-298C
Category: AC
Class: 1

Function: Prevents reverse flow from the Reactor Coolant Pump Seal Injection Ssystem to the Chemical and Volume Control System.

Test Requirement: IWV-3520

Basis for Relief: Testing these valves during plant operation would interrupt flow to the Reactor Coolant Pump Controlled Leakage Seal System, which could result in damage to the Reactor Coolant pumps; thereby, placing the plant in an unsafe mode of operation.

Further, the testing of these valves during cold shutdowns is impractical since it would require draining the Reactor Coolant Pump Seal Injection System to check the position of these valves. This would increase the possibility of causing damage to the Reactor Coolant pump seals due to the added frequency of venting the system prior to plant operation.

Alternate Testing: These valves will be tested during refueling shutdowns..

RELIEF REQUEST BASIS

SYSTEM: Chemical and Volume Control

14. Valve: 3-312C
Category: AC
Class: 1

Function: Prevents reverse flow from the Reactor Coolant System charging flow path to the Chemical and Volume Control System.

Test Requirement: IWV-3520

Basis for Relief: Testing this valve during plant operation would cause an unbalanced flow condition in the Chemical and Volume Control System. This could result in damage to the Reactor Coolant pumps; thereby, placing the plant in an unsafe mode of operation.

Testing this valve during cold shutdown is impractical because it would require draining the charging system to check the position of the valve. This would cause a loss of the charging flow path that is routinely used to meet the Tech Spec requirements to have a Boron injection flow path to the Reactor Coolant System during cold shutdown.

Alternate Testing: This valve will be tested during refueling shutdowns.

RELIEF REQUEST BASIS

SYSTEM: Safety Injection

1. Valve: MOV-3-860A and MOV-3-860B
Category: B
Class: 2

Function: Provides the flow path from train "A" and train "B" containment recirculation sumps to the suction of the Residual Heat Removal pumps "A" and "B" respectively, during the recirculation phase following a LOCA.

Test Requirement: IWV-3410

Basis for Relief: In the event that maintenance is required upon the failure of either of these valves, by testing during plant operation, it would cause a loss of containment integrity.

Alternate Testing: These valves will be tested during cold shutdowns.

2. Valve: MOV-3-861A and MOV-3-861B
Category: A
Class: 2

Function: Provides the flow path from train "A" and train "B" containment recirculation sumps to the suction of the Residual Heat Removal pumps "A" and "B" respectively, during the recirculation phase following a LOCA.

Test Requirement: IWV-3410

Basis for Relief: The failure of either of these valves in the open position, by testing during plant operation, would cause a loss of containment integrity.

Alternate Testing: These vlves will be tested during cold shutdowns.



RELIEF REQUEST BASIS

SYSTEM: Safety Injection

3. Valve: MOV-3-863A and MOV-3-863B
Category: B
Class: 2

Function: Provides the flow path to the alternate header to the Reactor Coolant System from the Low Pressure Safety Injection System. Also, provides the flow path to the High Pressure Safety Injection System during the recirculation mode.

Test Requirement: IWV-3410

Basis for Relief: The failure of either of these valves in the open position, by testing during plant operation, would result in diverting flow from the reactor core in the event of a safety injection signal.

Alternate Testing: These valves will be tested during cold shutdowns.

Valve: MOV-3-872
Category: B
Class: 2

Function: Provides the alternate flow path from the Low Pressure Safety Injection System to the Reactor Coolant System.

Test Requirement: IWV-3410

Basis for Relief: The failure of this valve in the open position, by testing during plant operation would result in diverting flow during the High Pressure Recirculation mode.

Alternate Testing: This valve will be tested during cold shutdowns.

RELIEF REQUEST BASIS

SYSTEM: Safety Injection

5. Valve: CV-3-855
Category: A
Class: 2

Function: Provides the Nitrogen supply to maintain pressure in the Safety Injection Accumulators.

Test Requirement: IWV-3410

Basis for Relief: The failure of this valve in the closed position, by testing during plant operation, would cause a loss of Nitrogen make-up to the accumulators to maintain the pressure above Tech Spec limits.

Alternate Testing: This valve will be tested during cold shutdowns.

6. Valve: MOV-3-866A and MOV-3-866B
Category: B
Class: 1

Function: Provides High Pressure Safety Injection redundant flow paths to the Reactor Coolant System Hot Legs.

Test Requirement: IWV-3410

Basis for Relief: These valves are required by Tech Specs to be closed and locked-out at the breaker during plant operation. The testing of these valves during plant operation, coupled with the failure of Valve 3-874A or 3-874B, could subject the Safety Injection System to pressures in excess of its design pressure.

Alternate Testing: These valves will be tested during cold shutdowns.

RELIEF REQUEST BASIS

SYSTEM: Safety Injection

7. Valve: 3-876A, 3-876C and 3-876B
Category: C
Class: 1

Function: Prevents reverse flow from the Accumulator Safety Injection System and the High Pressure Safety Injection System to the Low Pressure Safety Injection System.

Test Requirement: IWV-3520

Basis for Relief: These valves cannot be tested during operation because the Low Pressure Safety Injection pumps do not develop sufficient discharge head to establish a flow path to the Reactor Coolant System.

Alternate Testing: These valves will be tested during cold shutdowns.

8. Valve: 3-876D and 3-876E
Category: C
Class: 1

Function: Prevents reverse flow from the Accumulator Safety Injection System and the High Pressure Safety Injection System to the Low Pressure Safety Injection System alternate flow path.

Test Requirement: IWV-3520

Basis for Relief: These valves cannot be tested during plant operation because the Low Pressure Safety Injection pumps do not develop sufficient discharge head to establish a flow path to the Reactor Coolant System.

Alternate Testing: These valves will be tested during cold shutdowns.

RELIEF REQUEST BASIS

SYSTEM: Safety Injection

9. Valve: 3-875A, 3-875B, 3-875C
Category: C
Class: 1

Function: Prevents reverse flow from the Reactor Coolant System to the Accumulator Safety Injection system, Low Pressure Safety Injection System, and High Pressure Safety Injection System.

Test Requirement: IWV-3520

Basis for Relief: These valves cannot be tested during plant operation because the High Pressure Safety Injection or Low Pressure Safety Injection pumps do not develop sufficient discharge head to establish a flow path to the Reactor Coolant System.

Alternate Testing: These valves will be tested during cold shutdowns.

10. Valve: MOV-878A and MOV-878B
Category: B
Class: 2

Function: Provides a flow path for any combination of two of the four High Pressure Safety Injection pumps to the Reactor Coolant System of either unit.

Test Requirement: IWV-3410

Basis for Relief: In the event that maintenance is required upon the failure of either of these valves, by testing during plant operation of both units, it would jeopardize the ability of the High Pressure Safety Injection pumps to support a LOCA; thereby, placing the units in an unsafe mode of operation.

In the event that maintenance is required upon the failure of either of these valves, by testing during cold shutdown of either unit, it would jeopardize the ability of the High Pressure Safety Injection pumps to support a LOCA on the operating unit; thereby, placing that unit in an unsafe mode of operation.

Alternate Testing: These valves will be tested during refueling shutdowns.

RELIEF REQUEST BASIS

SYSTEM: Safety Injection

11. Valve: MOV-3-864A and MOV-3-864B
Category: B
Class: 2

Function: Provides the flow path to the High Pressure Safety Injection, Low Pressure Safety Injection, and Containment Spray pumps.

Test Requirement: IWV-3410

Basis for Relief: These valves are required by Tech Specs to be open and locked-out at the breaker during plant operation.

The failure of either of these valves in the closed position, by testing during plant operation, would cause a total loss of the Containment Spray and the Low Pressure Safety Injection Systems and, further, jeopardize the High Pressure Safety Injection System; thereby, placing the plant in an unsafe mode of operation.

The failure of either of these valves in the closed position, by testing during cold shutdown, would jeopardize the High Pressure Safety Injection System and cause a loss of an emergency flow path to the Boration Systems; thereby, placing the plant in an unsafe mode of operation.

Alternate Testing: These valves will be tested during refueling shutdowns.

RELIEF REQUEST BASIS

SYSTEM: Safety Injection

12. Valve: MOV-3-862A and MOV-3-862B
Category: B
Class: 2

Function: Provides a flow path to the Low Pressure Safety Injection System.

Test Requirement: IWV-3410

Basis for Relief: These valves are required by Tech Specs to be open and locked-out at the breaker during plant operation. The failure of either of these valves in the closed position, by testing during plant operation, would cause a total loss of the Low Pressure Safety Injection System.

In the event that maintenance is required upon the failure of Valve 862A, by testing during cold shutdown, it would cause a loss of the RWST and jeopardize the ability of the High Pressure Safety Injection Pumps to support a LOCA on the operating unit. In the event that maintenance is required upon the failure of Valve 862B, by testing during cold shutdown, it would cause a loss of the ability to cool the core.

Alternate Testing: These valves will be tested during refueling shutdowns.

RELIEF REQUEST BASIS

SYSTEM: Safety Injection

13. Valve: SV-3-2905 and SV-3-2906
SV-3-2907 and SV-3-2908
SV-3-2909 and SV-3-2910

Category: B
Class: 2.

Function: Provides for redundant flow paths from the operating Containment Spray Headers to the associated Emergency Containment Filter.

Test Requirement: IWV-3410

Basis for Relief: These redundant self-contained, completely enclosed solenoid valves have no external valve position indicators. Therefore, stroke-time measurements and valve position verification is impractical..

Functional testing of these redundant valves by placing the containment spray system in operation would result in dousing the filters and other components located inside the containment building. Testing these valves by connecting an external water source to the containment spray header would also result in dousing the filters and other components located inside the containment building.

Alternate Testing: These redundant valves will be tested by connecting an external air supply with sufficient air pressure to verify the main disk moves to the open position.

These valves will be tested during refueling shutdowns.



RELIEF REQUEST BASIS

SYSTEM: Safety Injection

14. Valve: 3-2918 and 3-2921
3-2919 and 3-2922
3-2920 and 3-2923
3-890A and 3-890B

Category: C
Class: 2

Function: Prevents reverse flow from an operating Containment Spray header to the other Containment Spray Header.

Test Requirement: IWV-3520

Basis for Relief: Functional testing of these redundant valves by placing the containment spray system in operation would result in dousing the components located inside the containment building. testing these redundant valves by connecting an external water source to the containment spray system would also result in dousing the components located inside the containment building.

Alternate Testing: Each of these redundant check valves will be disassembled, to inspect the valves' internals and to physically verify the valves' freedom of motion to the open and closed position, at least once each 120 month Inservice Inspection Interval. This inspection will be performed during refueling shutdowns. Any problems found during this inspection would be cause for inspecting the other valves. This provides for an inspection of one of these redundant check valves during refueling shutdowns over the 120 month Inservice Inspection Interval.

RELIEF REQUEST BASIS

SYSTEM: Safety Injection

15. Valve: 3-874A and 3-874B
Category: C
Class: 1

Function: Prevents reverse flow from the Reactor Coolant System
Hot Legs to the High Pressure Safety Inspection System.

Test Requirement: IWV-3520

Basis for Relief: These valves cannot be tested during plant operation because the High Pressure Safety Inspection pumps do not develop sufficient discharge head to establish a flow path to the Reactor Coolant System.

Further, testing of these valves during cold shutdowns is impractical since it could subject the Reactor Coolant System to conditions exceeding Pressure-Temperature limits.

Alternate Testing: These valves will be tested during refueling shutdowns.

RELIEF REQUEST BASIS

SYSTEM: Safety Injection

16. Valve: 3-873A and 3-873B, and 3-873C
Category: C
Class: 1

Function: Prevents reverse flow from the Accumulator Safety Injection System and the Low Pressure Safety Injection System to the High Pressure Safety Injection System.

Test Requirement: IWV-3520

Basis for Relief: These valves cannot be tested during plant operation because the High Pressure Safety Injection pumps do not develop sufficient discharge head to establish a flow path to the Reactor Coolant System.

Further, testing of these valves during cold shutdowns is impractical since it could subject the Reactor Coolant System to conditions exceeding Pressure-Temperature limits.

Alternate Testing: These valves will be tested during refueling shutdowns.

17. Valve: 3-875D, 3-875E, and 3-875F
Category: C
Class: 1

Function: Prevents reverse flow from the High Pressure Safety Injection System and the Low Pressure Safety Injection System to the Accumulator Safety Injection System.

Test Requirement: IWV-3520

Basis for Relief: These valves cannot be tested during plant operation because the accumulator pressure is insufficient to provide the differential pressure required to establish a flow path to the Reactor Coolant System.

Further, testing of these valves during cold shutdowns is impractical since it could subject the Reactor Coolant System to conditions exceeding Pressure-Temperature limits.

Alternate Testing: These valves will be tested during refueling shutdowns.

RELIEF REQUEST BASIS

SYSTEM: Safety Injection

19. Valve: 879A, 879B, 879C, and 879D
Category: C
Class: 2

Function: Prevents reverse flow from the High Pressure Safety System Supply Header to a non-operating High Pressure Safety Injection Pump.

Test Requirement: IWV-3520

Basis for Relief: These valves cannot be tested during plant operation because the High Pressure Safety Injection System Pumps do not develop sufficient discharge head to establish a flow path to the Reactor Coolant System.

Further, testing of these valves during cold shutdowns is impractical since it could subject the Reactor Coolant System to conditions exceeding pressure-temperature limits.

Alternate Testing: These check valves will be exercised during refueling shutdown.

Additional Testing: These check valves will be exercised quarterly during the performance of associated pump tests..

RELIEF REQUEST BASIS

SYSTEM: Auxiliary Coolant, Component Cooling Water

1. Valve: CV-3-739
Category: B
Class: 2

Function: Provides the component cooling water return flow path for the excess letdown heat exchanger.

Test Requirement: IWV-3410

Basis for Relief: The failure of this valve in the closed position, by testing during plant operation, would cause a loss of the Excess Letdown Heat Exchanger System function.

Alternate Testing: This valve will be tested during cold shutdowns.

Valve: 3-738
Category: C
Class: 2

Function: Prevents reverse flow from the excess letdown heat exchanger, shell side, to the component cooling water supply header.

Test Requirement: IWV-3520

Basis for Relief: The failure of this valve in the closed position, by testing during plant operation, would cause a loss of Excess Letdown Heat Exchanger System function.

Alternate Testing: This valve will be tested during cold shutdowns.

RELIEF REQUEST BASIS

SYSTEM: Auxiliary Coolant, Component Cooling Water

3. Valve: MOV-3-716A
Category: B
Class: 3

Function: Provides the component cooling water supply flow path for the heat exchangers located in the Reactor Coolant pumps (motors and thermal barriers).

Test Requirement: IWV-3410

Basis for Relief: Testing this valve during plant operation would cause interruption of cooling water to the Reactor Coolant pumps' heat exchangers. This action could result in damage to the Reactor Coolant pumps; thereby, placing the plant in an unsafe mode of operation.

Alternate Testing: This valve will be tested during cold shutdowns.

4. Valve: MOV-3-716B
Category: B
Class: 2

Function: Provides the component cooling water supply flow path for the heat exchangers located in the Reactor Coolant pumps (motors and thermal barriers).

Test Requirement: IWV-3410

Basis for Relief: Testing this valve during plant operation would cause interruption of cooling water to the Reactor Coolant pumps' heat exchangers. This action could result in damage to the Reactor Coolant pumps; thereby, placing the plant in an unsafe mode of operation.

Alternate Testing: This valve will be tested during cold shutdowns.

RELIEF REQUEST BASIS

SYSTEM: Auxiliary Coolant, Component Cooling Water

5. Valve: MOV-3-730
Category: B
Class: 2

Function: Provides the component cooling water return flow path for the Reactor Coolant pumps' motor heat exchangers.

Test Requirement: IWV-3410

Basis for Relief: Testing this valve during plant operation would cause interruption of cooling water to the Reactor Coolant pumps' motor heat exchangers. This action could result in damage to the Reactor Coolant pumps; thereby, placing the plant in an unsafe mode of operation.

Alternate Testing: This valve will be tested during cold shutdowns.

6. Valve: FCV-3-626
Category: B
Class: 2

Function: Provides the component cooling return flow path for the Reactor Coolant Pumps' Controlled Leakage Seal System thermal barriers.

Test Requirement: IWV-3410

Basis for Relief: Testing this valve during plant operation would cause interruption of cooling water to the Reactor Coolant pumps' Controlled Leakage Seal System heat exchangers. This action could result in damage to the Reactor Coolant pumps; thereby, placing the plant in an unsafe mode of operation.

Alternate Testing: This valve will be tested during cold shutdowns.

RELIEF REQUEST BASIS

SYSTEM: Reactor Coolant

1. Valve: CV-3-519A
Category: A
Class: 2

Function: Provides a primary water flow path to either the pressurizer relief tank or the Reactor Coolant pumps' standpipes.

Test Requirement: IWV-3410

Basis for Relief: Failure of this valve in the open position, by testing during plant operation, would cause a loss of containment integrity.

Alternate Testing: This valve will be tested during cold shutdowns.

2. Valve: 3-519
Category: AC
Class: 2

Function: Prevents reverse flow from the Pressurizer Relief Tank to the Nitrogen system.

Test Requirement: IWV-3520

Basis for Relief: Failure of this valve in the open position, by testing during plant operation, would cause a loss of containment integrity.

Alternate Testing: This valve will be tested during cold shutdowns.

RELIEF REQUEST BASIS

SYSTEM: Reactor Coolant

3. Valve: SV-3-6385
Category: A
Class: 2

Function: Provides flow path from pressurizer relief tank to gas analyzer.

Test Requirement: IWV-3320

Basis for Relief: These self contained, completely enclosed solenoid valves have no external valve position indication. Therefore direct observation of valve position indication is impractical.

Alternate Testing: These valves will be checked during local leak rate tests to verify that remote valve indications accurately reflect valve operation.

RELIEF REQUEST BASIS

SYSTEM: Reactor Coolant

4. Valve: SV-3-6319A and SV-3-6319B
Category: B
Class: 2

Function: Provides for redundant flow paths from the pressurizer to the Reactor Coolant Vent System.

Test Requirement: IWV-3410

Basis for Relief: These valves are required to be positioned closed and key locked to prevent inadvertent operation of these valves during unit operation.

Failure of either of these valves, while testing during unit operation, would result in a unit outage to perform maintenance on the failed valve.

Alternate Testing: These valves will be tested during cold shutdowns.

Test Requirement: IWV-3300

Basis for Relief: These self contained, completely enclosed solenoid valves have no local valve position indication. Therefore, observation of valve position indication is impractical.

Alternate Testing: Valve disk movement will be determined by exercising the valve while observing flow to the containment atmosphere, the containment sump, or while observing an increase in level in the pressurizer relief tank. This will reflect valve disk position and will verify that remote valve position indications accurately reflect valve operation.

RELIEF REQUEST BASIS

SYSTEM: Reactor Coolant

5. Valve: SV-3-6318A, SV-3-6318B, SV-3-6320A, and SV-3-6320B
Category: B
Class: 2

Function: Provides for redundant flow paths from the reactor vessel closure head to the Reactor Coolant Vent System.

Test Requirement: IWV-3410

Basis for Relief: These valves are required to be positioned closed and key locked to prevent inadvertent operation of these valves during normal unit operation.

Failure of any of these valves, while testing during unit operation, would result in a unit outage to perform maintenance on the failed valve.

Alternate Testing: These valves will be tested during cold shutdowns.

Test Requirement: IWV-3300

Basis for Relief: These self contained, completely enclosed solenoid valves have no local valve position indication. Therefore, observation of valve position indication is impractical.

Alternate Testing: Valve disk movement will be determined by exercising the valve while observing flow to the containment atmosphere, the containment sump, or while observing an increase in level in the pressurizer relief tank. This will reflect valve disk position and will verify that remote valve position indications accurately reflect valve operation.



RELIEF REQUEST BASIS

SYSTEM: Sampling

1. Valve: CV-3-956A, CV-3-956B, SV-3-6428 and CV-3-956D
Category: A
Class: 2

Function: Provides the flow path from the pressurizer steam space, the pressurizer liquid space, the Reactor Coolant System, and the accumulators respectively, to the Sample System.

Test Requirement: IWV-3410

Basis for Relief: The failure of any one of these valves in the open position, by testing during plant operation, would cause a loss of containment integrity.

Alternate Testing: These valves will be tested during cold shutdowns.

2. Valve: SV-3-6428
Category: A
Class: 2

Function: Provides the flow path from the Reactor Coolant System to the Sample System.

Test Requirement: IWV-3300

Basis for Relief: This self-contained, completely enclosed solenoid valve has no external valve position indicator. Therefore, observation of valve position is impractical.

Alternate Testing: Valve disk movement will be determined by exercising the valve while observing flow to the Sample System. This will reflect valve disk position and will verify that remote valve position indications accurately reflect valve operation.

RELIEF REQUEST BASIS

SYSTEM: Auxiliary Coolant, Residual Heat Removal

1. Valve: MOV-3-744A and MOV-3-744B
Category: B
Class: 2

Function: Provides a flow path from the Low Pressure Safety Injection System to the Reactor Coolant System.

Test Requirement: IWV-3410

Basis for Relief: The testing of these valves during plant operation, coupled with the failure of Valves 3-876A, 3-876B or 3-876C, could subject the Low Pressure Safety Injection System to pressures in excess of its design pressure.

Alternate Testing: These check valves will be tested during cold shutdown.

2. Valve: 3-753A and 3-753B
Category: C
Class: 2

Function: Prevents reverse flow from the Low Pressure Safety Injection (Residual Heat Removal) System supply header to a non-operating Low Pressure Safety Injection (Residual Heat Removal) pump.

Test Requirement: IWV-3520

Basis for Relief: These valves cannot be tested during plant operation because the Low Pressure Safety Injection (Residual Heat Removal) pumps do not develop sufficient discharge head to establish a flow path to the Reactor Coolant System.

Alternate Testing: These check valves will be exercised during cold shutdown.

Additional Testing: These check valves will be exercised quarterly during the performance of associated pump tests.

RELIEF REQUEST BASIS

SYSTEM: Auxiliary Coolant, Residual Heat Removal

3. Valve: MOV-3-751
Category: B (previously categorized as A)
Class: 1

Function: Provides a flow path from the Reactor Coolant System to the Residual Heat Removal System for removal of decay heat from the reactor core.

Test Requirement: IWV-3420

Basis for Relief: Seat leak testing this valve when fuel is in the reactor pressure vessel would cause a loss of system function. This would result in violation of the current plant Technical Specifications.



RELIEF REQUEST BASIS

SYSTEM: Main Steam

1. Valve: POV-3-2604, POV-3-2605, and POV-3-2606
Category: C
Class: 2

Function: Provides the flow path from the associated steam generator to the main steam line header.

Test Requirement: IWV-3520

Basis for Relief: Testing any one of these valves during plant operation would isolate the associated steam generator from the main steam line header which would result in a reactor trip.

Alternate Testing: These valves will be tested during cold shutdowns.

RELIEF REQUEST BASIS

SYSTEM: Condensate and Feedwater

1. Valve: MOV-3-1425, MOV-3-1426, and MOV-3-1427
Category: B
Class: 2

Function: Provides the flow path from the associated steam generator secondary side to the Sampling System.

Test Requirement: IWV-3410

Basis for Relief: The failure of any one of these valves in the closed position, by testing during plant operation, would result in a loss of ability to sample the associated steam generator; thereby, affecting the ability to verify proper chemistry control and to detect radioactivity.

Alternate Testing: These valves will be tested during cold shutdowns.

2. Valve: CV-3-6275A, CV-3-6275B, and CV-3-6275C
Category: B
Class: 2

Function: Provides the flow path from the associated steam generator secondary side to the Blowdown system.

Test Requirement: IWV-3410

Basis for Relief: The failure of any one of these valves in the closed position, by testing during plant operation, would result in a loss of ability to blowdown the associated steam generator; thereby, affecting the ability to maintain proper chemistry control

Alternate Testing: These valves will be tested during cold shutdowns.

RELIEF REQUEST BASIS

SYSTEM: Condensate and Feedwater

3. Valve: CV-3-2900, CV-3-2901, and CV-3-2902
Category: C
Class: 2

Function: Prevents reverse flow from the associated steam generator to the Feedwater System.

Test Requirement: IWV-3520

Basis for Relief: Testing any one of these valves, during plant operation would cause an interruption of feedwater flow to the associated steam generator; thereby, placing the plant in an unsafe mode of operation.

Alternate Testing: These valves will be tested during cold shutdowns.

Valve: CV-3-2816, CV-3-2817, CV-3-2818
CV-3-2831, CV-3-2832, and CV-3-2833
Category: B
Class: 2

Function: Provides a flow path from the Auxiliary Feedwater Pump Discharge Header to the Steam Generator Nos. 3A, 3B, or 3C.

Test Requirement: IWV-3410

Basis for Relief: These valves are flow controlled modulating valves. therefore, valve stroke-time is not essential to fulfill their safety related function.

Alternate Testing: Exercising these valves quarterly will demonstrate that the moving parts of the valve function satisfactorily.



RELIEF REQUEST BASIS

SYSTEM: Service Air (Lube Oil, Service and Instrument Air)

1. Valve: 3-40-204
Category: A
Class: 2

Function: Provides the flow path from the Service Air System to the containment.

Test Requirement: IWV-3410

Basis for Relief: The failure of the valve in the open position, by testing during plant operation, would cause a loss of containment integrity.

Alternate Testing: This valve will be tested during cold shutdowns.

2. Valve: 3-40-205
Category: AC
Class: 2

Function: Prevents reverse flow from the containment atmosphere to the Service Air System located outside containment.

Test Requirement: IWV-3520

Basis for Relief: The failure of this valve in the open position, by testing during plant operation, would cause a loss of containment integrity.

Alternate Testing: This valve will be tested during cold shutdowns.

RELIEF REQUEST BASIS

SYSTEM: Service Air (Lube Oil, Service and Instrument Air)

3. Valve: 3-40-203
Category: B
Class: 2

Function: Provides the flow path from the Service Air System to the containment (valve in series with 3-40-204).

Test Requirement: IWV-3410

Basis for Relief: This valve is required to be tested only to provide the necessary flow path to valve 3-40-204 and will be tested during cold shutdowns (See 3-40-204 RRB No. 1).

Alternate Testing: This valve will be tested during cold shutdowns.

RELIEF REQUEST BASIS

SYSTEM: Instrument Air (Lube Oil, Service and Instruemtn Air)

4. Valve: 3-40-336
Category: AC
Class: 2

Function: Prevents reverse flow from the Instrument Air System, inside containment, to the Instrument Air system, located outside containment.

Test Requirement: IWV-3520

Basis for Relief: Testing this valve during plant operation would interrupt the instrument air supply to the components located inside containment that require instrument air for proper operation; thereby, placing the plant in an unsafe mode of operation.

Testing this valve during cold shutdown would interrupt the instrument air supply to the components located inside containment that require instrument air to maintain the plant in a safe shutdown condition; thereby, placing the plant in an unsafe mode of operation.

Alternate Testing: This valve will be tested during refueling shutdowns.

RELIEF REQUEST BASIS

SYSTEM: Primary Make-up and Containment Cooling Water

1. Valve: MOV-3-1417 and MOV-3-1418
Category: B
Class: 2

Function: Provides the component cooling water supply (MOV-3-1417) and return (MOV-3-1418) flow paths for the normal containment coolers, the control rod drive mechanism coolers, and the primary shield cooling coils.

Test Requirement: IWV-3410

Basis for Relief: Testing these valve during plant operation would cause interruption of cooling water to the normal containment cooler, the control rod drive mechanism coolers, and the primary shield cooling coils. This action could result in damage to the control rod drive mechanisms and associated equipment; thereby, placing the plant in an unsafe mode of operation.

Alternate Testing: These valves will be tested during cold shutdowns.

RELIEF REQUEST BASIS

SYSTEM: Containment Ventilation

1. Valve: HV-3-1 and HV-3-3
Category: B
Class: 2

Function: Provides redundant flow paths for Post Loss of Coolant Accident purge.

Test Requirement: IWV-3410

Basis for Relief: In the event that maintenance is required upon the failure of either of these valves, by testing during plant operation, it would cause a loss of containment integrity.

Alternate Testing: These valves will be tested during cold shutdowns.

Valve: HV-3-2 and HV-3-3; PAHM-3-001A and PAHM-3-001B
Category: A
Class: 2

Function: Provides redundant flow paths for Post Loss of Coolant Accident purge.

Test Requirement: IWV-3410

Basis for Relief: The failure of either of these valves in the open position, by testing during plant operation, would cause a loss of containment integrity.

Alternate Testing: These valves will be tested during cold shutdowns.

RELIEF REQUEST BASIS

SYSTEM: Containment Ventilation

Valve: 3-11-003
Category: AC
Class: 2

Function: Prevents reverse flow from the containment atmosphere to the Containment Gas and Particulate Radioactivity Detection System.

Test Requirement: IWV-3520

Basis for Relief: The Tech Specs require two independent systems to monitor reactor coolant leakage; one of which has to be sensitive to radioactivity. Testing this valve during plant operation would cause an interruption of the Reactor Coolant Leak Detection System which is sensitive to radioactivity.

Similarly, testing this valve during cold shutdown would result in an interruption of the Detection System which is sensitive to radioactivity.

Alternate Testing: This valve will be tested during refueling shutdowns.

4. Valve: PAHM-3-002A and PAHM-3-002B
Category: A
Class: 2

Function: Prevents reverse flow from the containment atmosphere to the Containment Gas and Particulate Radioactivity Detection System.

Test Requirement: IWV-3520

Basis for Relief: The Tech Specs require two independent systems to monitor reactor coolant leakage; one of which has to be sensitive to radioactivity. Testing this valve during plant operation would cause an interruption of the Reactor Coolant Leak Detection System which is sensitive to radioactivity.

Similarly, testing this valve during cold shutdown would result in an interruption of the Detection System which is sensitive to radioactivity.

Alternate Testing: This valve will be tested during refueling shutdowns.

RELIEF REQUEST BASIS

SYSTEM: Containment Ventilation

5. Valve: SV-3-2911, SV-3-2913, AND SV-3-2912
Category: A
Class: 2

Function: Provides flow path from the containment atmosphere to the containment gas and particulate radio-activity detection system and return to containment.

Test Requirement: IWV-3300

Basis for Relief: These self contained, completely enclosed solenoid valves have no external valve position indication. Therefore direct observation of valve position indication is impractical.

Alternate Testing: These valves will be checked during local leak rate tests to verify that remote valve indications accurately reflect valve operation.

RELIEF REQUEST BASIS

SYSTEM: Diesel Oil

1. Valve: SV-3522A and SV-3522B
Category: B
Class: 2

Function: Provides the flow path from the Emergency Diesel - generator Diesel Oil Day Tank to the Skid-mounted Diesel Oil Tank.

Test Requirement: IWV-3410

Basis for Relief: These self-contained, completely enclosed solenoid valves have no external valve position indicators. Therefore, stroke-time measurements and valve position verification is impractical.

Alternate Testing: An increase in level in the Skid-mounted Diesel Oil Tank while exercising these valves quarterly will demonstrate that the moving parts of the valve function satisfactorily.

2. Valve: CV-2046A and CV-2046B
Category: B
Class: 3

Function: Provides the flow path from the Emergency Diesel-generator Diesel Oil Transfer Pump Discharge Header to the Diesel Oil Day Tanks.

Test Requirement: IWV-3410

Basis for Relief: Valve stroke-time is not essential for the valve to fulfill its safety related function.

Alternate Testing: Exercising these valves quarterly will demonstrate that the moving parts of the valve function satisfactorily.

II. PUMP TEST PROGRAM

II.A. Table IV - Test Parameters

This subsection outlines the pumps which are provided an emergency power source.

II.B. Test Interval

In accordance with Relief Request to sub-section IWP-3400, the quarterly test interval as defined in this pump test program is only inclusive of operational modes Power Operation, Hot Standby, or Hot Shutdown (as appropriate) as defined in the Turkey Point Unit No. 3 Technical Specifications.

III.C. Attachment A-2

Relief Request Basis

FLORIDA POWER & LIGHT COMPANY
TABLE IV
PUMP TEST PROGRAM

PUMP	PUMP NO.	TEST PARAMETERS						
		Speed, H	Inlet Pressure P ₁	Differential Pressure DELTA P	Flow Rate Q	Vibration Amplitude, V	Bearing Temperature T _b (1)	RRB NO.
Auxiliary Feed	P2A	Yes	Yes	Yes	Yes (3)	Yes	Yes	---
	P2B	Yes	Yes	Yes	Yes (3)	Yes	Yes	---
	P2C	Yes	Yes	Yes	Yes (3)	Yes	Yes	---
Intake Cooling Water	3-P9A	No	Yes	Yes	Yes (3)	Yes	No	2
	3-P9B	No	Yes	Yes	Yes (3)	Yes	No	2
	3-P9C	No	Yes	Yes	Yes (3)	Yes	No	2
Residual Heat Removal	3-P210A	No	Yes	Yes	No (2)	Yes	No	1&3
	3-P210B	No	Yes	Yes	No (2)	Yes	No	1&3
Component Cooling	3-P211A	No	Yes	Yes	Yes (3)	Yes	Yes	---
	3-P211B	No	Yes	Yes	Yes (3)	Yes	Yes	---
	3-P211C	No	Yes	Yes	Yes (3)	Yes	Yes	---
Containment Spray	3-P214A	No	Yes	Yes	No (2)	Yes	Yes	1
	3-P214B	No	Yes	Yes	No (2)	Yes	Yes	1

FLORIDA POWER & LIGHT COMPANY
TABLE IV
PUMP TEST PROGRAM

PUMP	PUMP NO.	TEST PARAMETERS						
		Speed, H	Inlet Pressure P_1	Differential Pressure DELTA P	Flow Rate Q	Vibration Amplitude, V	Bearing Temperature T_b (1)	RRB NO.
High Head Safety Injection	P215A	No	Yes	Yes	No (2)	Yes	Yes	1
	P215B	No	Yes	Yes	No (2)	Yes	Yes	1
	P215C	No	Yes	Yes	No (2)	Yes	Yes	1
	P215D	No	Yes	Yes	No (2)	Yes	Yes	1

NOTE (1): BEARING TEMPERATURE, $T_{(b)}$, IS MEASURED ONLY ON THE ANNUAL TEST.

NOTE (2): FIXED HYD. RESISTANCE SYSTEM

NOTE (3): VARIABLE HYD. RESISTANCE SYSTEM.

ATTACHMENT A-2

TURKEY POINT UNIT NO. 3

RELIEF REQUEST BASIS

RELIEF REQUEST BASIS

1) PUMPS:

Residual Heat Removal Pump No. 3A	(3-P210A)
Residual Heat Removal Pump No. 3B	(3-P210B)
Containment Spray Pump No. 3A	(3-P214A)
Containment Spray Pump No. 3B	(3-P214B)
High Head Safety Injection Pump No. A	(P215A)
High Head Safety Injection Pump No. B	(P215B)
High Head Safety Injection Pump No. C	(P215C)
High Head Safety Injection Pump No. D	(P215D)

Test Requirement: IWP-4600 Flow Measurement

Basis for Relief: Section XI, ASME Boiler & Pressure Vessel Code, requires measurement of flow rate using a rate or quantity meter installed in the pump test circuit. These pumps use a fixed hydraulic resistance system with an orifice installed in the pump recirculation line (IWP-1400).

Alternate Testing: Measure differential pressure (IWP-4240) across the pump during the quarterly pump test. measured differential pressure across the pump shall then be compared to the established reference value. This provides for an indirect measure of flow rate and verifies the operational readiness of the pump (IWP-1500).



RELIEF REQUEST BASIS

2) PUMPS:

Intake Cooling Water Pump No. 3A	(3-P9A)
Intake Cooling Water Pump No. 3B	(3-P9B)
Intake Cooling Water Pump No. 3C	(3-P9C)

Test Requirement: IWP-4310 (Bearing Temperature Measurement)

Basis for Relief: The pump bearings for these vertical centrifugal pumps are located inside the pump housing which is submerged. The bearings are water lubricated with no provisions for temperature measurement.

Alternate Testing: Measurement of vibration amplitude and the other required parameters during each pump test will provide for the detection of changes in the mechanical characteristics of the pump.

3) PUMPS:

Residual Heat Removal Pump No. 3A	(3-P210A)
Residual Heat Removal Pump No. 3B	(3-P210B)

Test Requirement: IWP-4310 (Bearing Temperature Measurement)

Basis for Relief: The pump bearings for these vertical centrifugal pumps are located inside the pump housing which is submerged. The bearings are water lubricated with no provisions for temperature measurement.

Alternate Testing: Measurement of vibration amplitude and the other required parameters during each pump test will provide for the detection of changes in the mechanical characteristics of the pump.

