

# REGULATOR INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:8312220117 DOC.DATE: 83/12/16 NOTARIZED: NO DOCKET #  
 FACIL:50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250  
 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251  
 AUTH.NAME AUTHOR AFFILIATION  
 WILLIAMS,J.W. Florida Power & Light Co.  
 RECIP.NAME RECIPIENT AFFILIATION  
 EISENHUT,D.G. Division of Licensing

SUBJECT: Requests relief from Tech Spec 4.2.1. inservice insp  
 requirements & specific ASME Code edition to perform visual  
 exam (YT2) in lieu of volumetric & surface exam  
 requirements.

DISTRIBUTION CODE: A047S COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 10  
 TITLE: OR Submittal: Inservice Inspection/Testing

## NOTES:

	RECIPIENT ID CODE/NAME		COPIES LTTR ENCL		RECIPIENT ID CODE/NAME		COPIES LTTR ENCL
	NRR ORB1 BC 01		7 7				
INTERNAL:	ELD/HDS4		1 0		NRR/DE/MEB	15	1 1
	NRR/DE/MTEB 14		1 1		<u>REG FILE</u>	04	1 1
	RGN2		1 1				
EXTERNAL:	ACRS	16	10 10		LPDR	03	1 1
	NRC PDR	02	1 1		NSIC	05	1 1
	NTIS		1 1				

TOTAL NUMBER OF COPIES REQUIRED: LTTR 26 ENCL 25

1. The first part of the document is a letter from the President of the United States to the Congress, dated January 1, 1861. It is a very important document, as it is the first official communication from the President to the Congress since the inauguration of Abraham Lincoln. The letter discusses the state of the Union and the challenges facing the country at the time.

1947-1948, 1949-1950, 1951-1952, 1953-1954, 1955-1956, 1957-1958, 1959-1960, 1961-1962, 1963-1964, 1965-1966, 1967-1968, 1969-1970, 1971-1972, 1973-1974, 1975-1976, 1977-1978, 1979-1980, 1981-1982, 1983-1984, 1985-1986, 1987-1988, 1989-1990, 1991-1992, 1993-1994, 1995-1996, 1997-1998, 1999-2000, 2001-2002, 2003-2004, 2005-2006, 2007-2008, 2009-2010, 2011-2012, 2013-2014, 2015-2016, 2017-2018, 2019-2020, 2021-2022, 2023-2024, 2025-2026, 2027-2028, 2029-2030, 2031-2032, 2033-2034, 2035-2036, 2037-2038, 2039-2040, 2041-2042, 2043-2044, 2045-2046, 2047-2048, 2049-2050, 2051-2052, 2053-2054, 2055-2056, 2057-2058, 2059-2060, 2061-2062, 2063-2064, 2065-2066, 2067-2068, 2069-2070, 2071-2072, 2073-2074, 2075-2076, 2077-2078, 2079-2080, 2081-2082, 2083-2084, 2085-2086, 2087-2088, 2089-2090, 2091-2092, 2093-2094, 2095-2096, 2097-2098, 2099-2100, 2101-2102, 2103-2104, 2105-2106, 2107-2108, 2109-2110, 2111-2112, 2113-2114, 2115-2116, 2117-2118, 2119-2120, 2121-2122, 2123-2124, 2125-2126, 2127-2128, 2129-2130, 2131-2132, 2133-2134, 2135-2136, 2137-2138, 2139-2140, 2141-2142, 2143-2144, 2145-2146, 2147-2148, 2149-2150, 2151-2152, 2153-2154, 2155-2156, 2157-2158, 2159-2160, 2161-2162, 2163-2164, 2165-2166, 2167-2168, 2169-2170, 2171-2172, 2173-2174, 2175-2176, 2177-2178, 2179-2180, 2181-2182, 2183-2184, 2185-2186, 2187-2188, 2189-2190, 2191-2192, 2193-2194, 2195-2196, 2197-2198, 2199-2200, 2201-2202, 2203-2204, 2205-2206, 2207-2208, 2209-2210, 2211-2212, 2213-2214, 2215-2216, 2217-2218, 2219-2220, 2221-2222, 2223-2224, 2225-2226, 2227-2228, 2229-2230, 2231-2232, 2233-2234, 2235-2236, 2237-2238, 2239-2240, 2241-2242, 2243-2244, 2245-2246, 2247-2248, 2249-2250, 2251-2252, 2253-2254, 2255-2256, 2257-2258, 2259-2260, 2261-2262, 2263-2264, 2265-2266, 2267-2268, 2269-2270, 2271-2272, 2273-2274, 2275-2276, 2277-2278, 2279-2280, 2281-2282, 2283-2284, 2285-2286, 2287-2288, 2289-2290, 2291-2292, 2293-2294, 2295-2296, 2297-2298, 2299-2300, 2301-2302, 2303-2304, 2305-2306, 2307-2308, 2309-2310, 2311-2312, 2313-2314, 2315-2316, 2317-2318, 2319-2320, 2321-2322, 2323-2324, 2325-2326, 2327-2328, 2329-2330, 2331-2332, 2333-2334, 2335-2336, 2337-2338, 2339-2340, 2341-2342, 2343-2344, 2345-2346, 2347-2348, 2349-2350, 2351-2352, 2353-2354, 2355-2356, 2357-2358, 2359-2360, 2361-2362, 2363-2364, 2365-2366, 2367-2368, 2369-2370, 2371-2372, 2373-2374, 2375-2376, 2377-2378, 2379-2380, 2381-2382, 2383-2384, 2385-2386, 2387-2388, 2389-2390, 2391-2392, 2393-2394, 2395-2396, 2397-2398, 2399-2400, 2401-2402, 2403-2404, 2405-2406, 2407-2408, 2409-2410, 2411-2412, 2413-2414, 2415-2416, 2417-2418, 2419-2420, 2421-2422, 2423-2424, 2425-2426, 2427-2428, 2429-2430, 2431-2432, 2433-2434, 2435-2436, 2437-2438, 2439-2440, 2441-2442, 2443-2444, 2445-2446, 2447-2448, 2449-2450, 2451-2452, 2453-2454, 2455-2456, 2457-2458, 2459-2460, 2461-2462, 2463-2464, 2465-2466, 2467-2468, 2469-2470, 2471-2472, 2473-2474, 2475-2476, 2477-2478, 2479-2480, 2481-2482, 2483-2484, 2485-2486, 2487-2488, 2489-2490, 2491-2492, 2493-2494, 2495-2496, 2497-2498, 2499-2500, 2501-2502, 2503-2504, 2505-2506, 2507-2508, 2509-2510, 2511-2512, 2513-2514, 2515-2516, 2517-2518, 2519-2520, 2521-2522, 2523-2524, 2525-2526, 2527-2528, 2529-2530, 2531-2532, 2533-2534, 2535-2536, 2537-2538, 2539-2540, 2541-2542, 2543-2544, 2545-2546, 2547-2548, 2549-2550, 2551-2552, 2553-2554, 2555-2556, 2557-2558, 2559-2560, 2561-2562, 2563-2564, 2565-2566, 2567-2568, 2569-2570, 2571-2572, 2573-2574, 2575-2576, 2577-2578, 2579-2580, 2581-2582, 2583-2584, 2585-2586, 2587-2588, 2589-2590, 2591-2592, 2593-2594, 2595-2596, 2597-2598, 2599-2600, 2601-2602, 2603-2604, 2605-2606, 2607-2608, 2609-2610, 2611-2612, 2613-2614, 2615-2616, 2617-2618, 2619-2620, 2621-2622, 2623-2624, 2625-2626, 2627-2628, 2629-2630, 2631-2632, 2633-2634, 2635-2636, 2637-2638, 2639-2640, 2641-2642, 2643-2644, 2645-2646, 2647-2648, 2649-2650, 2651-2652, 2653-2654, 2655-2656, 2657-2658, 2659-2660, 2661-2662, 2663-2664, 2665-2666, 2667-2668, 2669-2670, 2671-2672, 2673-2674, 2675-2676, 2677-2678, 2679-2680, 2681-2682, 2683-2684, 2685-2686, 2687-2688, 2689-2690, 26

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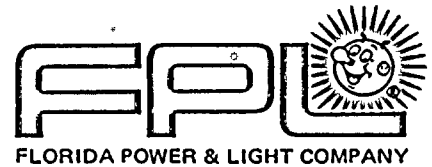
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1. The first part of the document is a list of names and titles, including "The Hon. Mr. Justice" and "The Hon. Mr. Justice".



December 16, 1983  
L-83-591

Office of Nuclear Reactor Regulation  
Attention: Mr. Darrell G. Eisenhut, Director  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Eisenhut:

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Relief Request from Technical Specification  
Inservice Inspection Requirements

Technical Specification 4.2.1 and 10 CFR 50.55 a(g) contain certain ISI  
scheduler requirements as well as a specific ASME Code Edition. Please find  
attached a relief request from certain of these requirements. The basis for  
the relief requested is also included in the attachment.

Very truly yours,

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

JWW/PLP/js

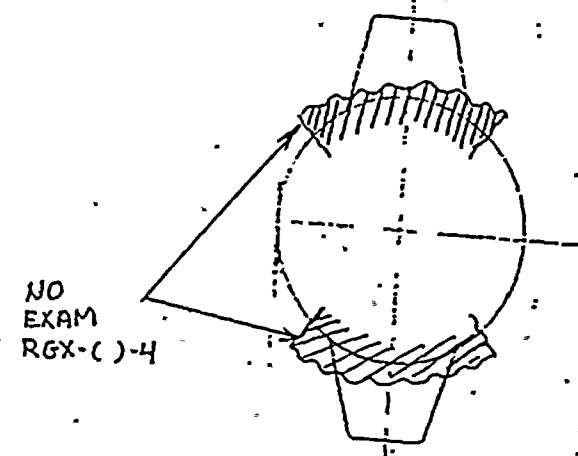
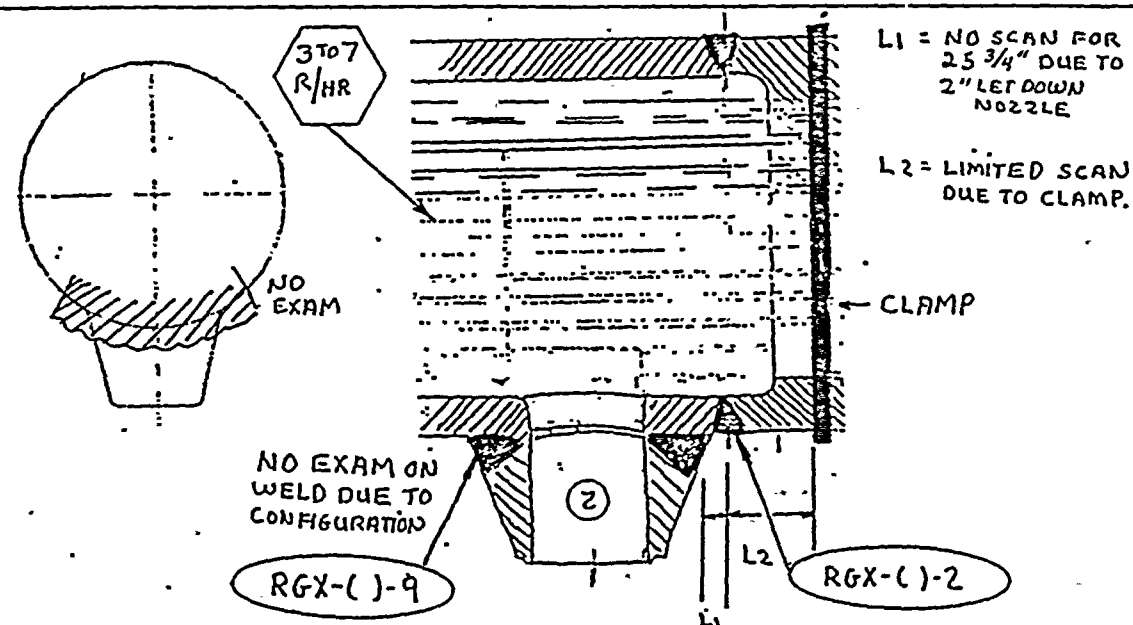
Attachment

cc: Mr. James P. O'Reilly, Region II  
Harold F. Reis, Esquire  
PNS-LI-83-746

8312220117 831216  
PDR ADOCK 05000250  
Q PDR

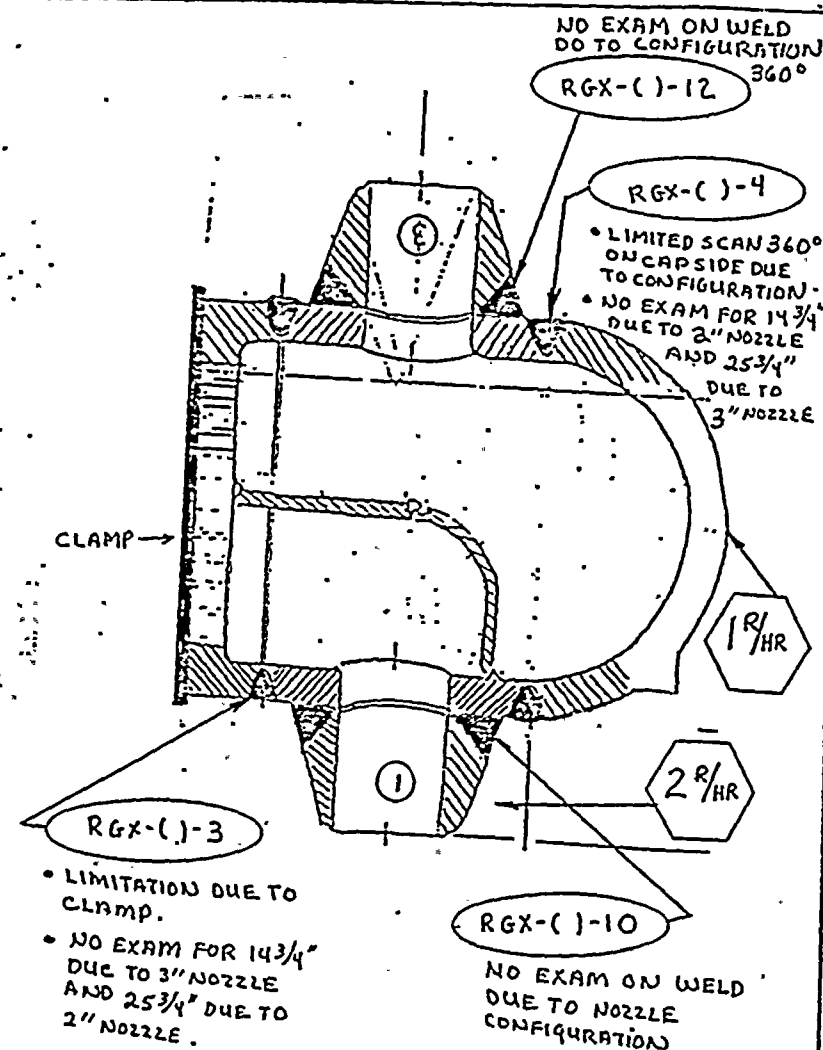
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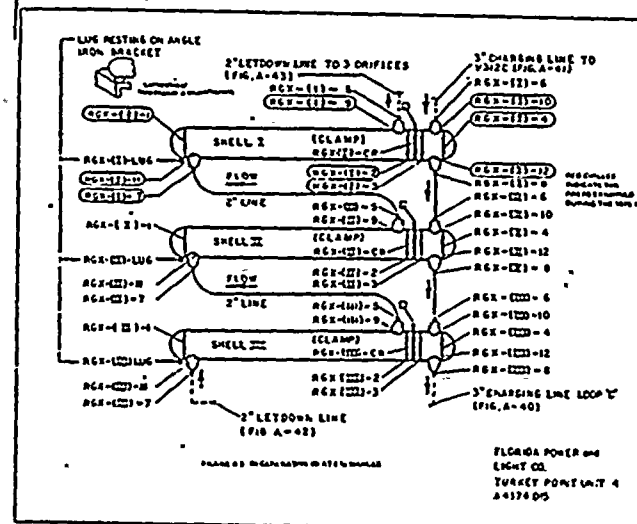
NO  
EXAM  
RGX-( )-4



PRC  
APERTURE  
CARD



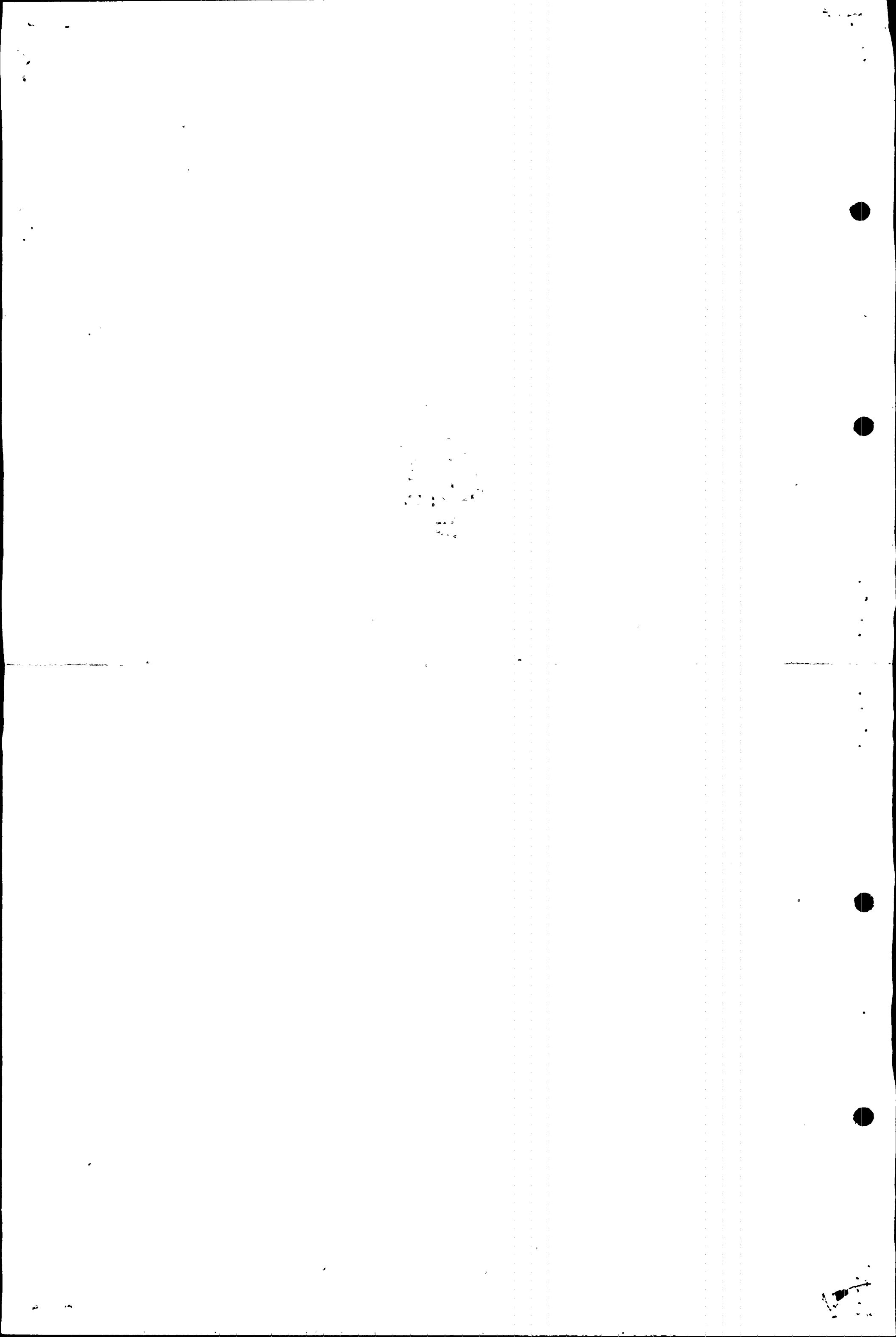
 = RADIATION READINGS  
IN REM/HOUR AT  
CONTACT.

**Also Available On  
Aperture Card**



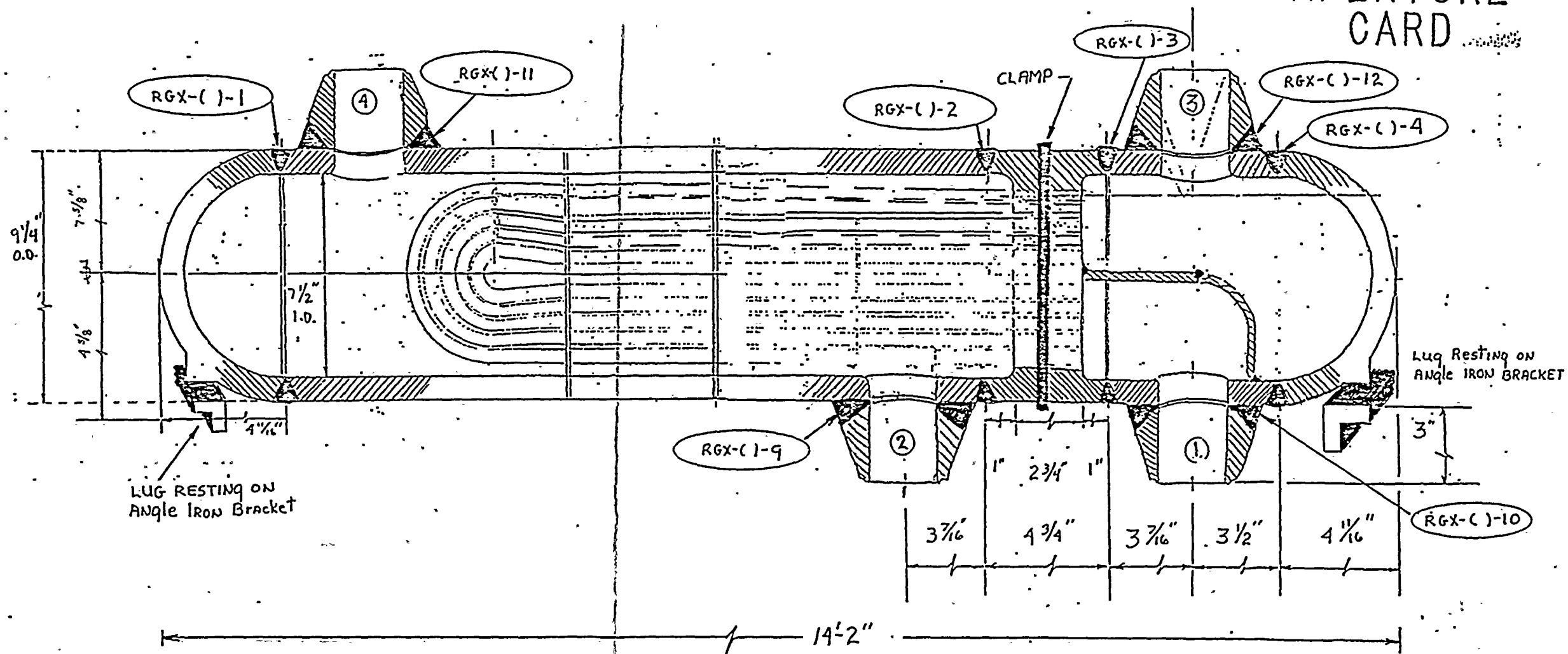
							<div>2" LETDOWN LINE (FIG. A-42)  FLORIDA POWER AND LIGHT CO. TURKEY POINT UNIT 4 A-174 D'S</div>		Aperture Card									
							DATE . 9-23-83		SCALE NONE		CODES AND INSPECTIONS GROUP		CLASS 1		MATERIAL STAINLESS STEEL			
							<div> FLORIDA POWER &amp; LIGHT COMPANY</div>		DRAWN BY		CHECKED BY		TURKEY POINT UNIT NO. 374		SHEET OF  ATTACHMENT 1		REVISION NUMBER	
									E.L. ANDERSON				TYPICAL EXAMINATION LIMITATIONS					
									COR BY				& RADIATION SURVEY OF THOSE					
									APPROVED BY				AREAS					
AUTH		NO		DATE		REVISION		BY		CH		APP						

8312220117-5



- ① 3" CHARGING LINE
- ② 2" LETDOWN LINE
- ③ 3" CHARGING LINE
- ④ 2" LETDOWN LINE

# PRC APERTURE CARD



Also Available On  
Aperture Card

Ref. Drawing: A04195-A0444 Rev. 8 Sentry Equipment Corp.

DATE 9-23-83

SCALE NONE

CODES AND INSPECTIONS GROUP

CLASS 1

MATERIAL

DRAWN BY

CHECKED BY

TURKEY POINT UNIT NO. 3/4

SHEET. OF

REVISION  
NUMBER

E.L. ANDERSON

REGENERATIVE HEAT

ATTACHMENT 2

COR BY

EXCHANGER

APPROVED BY

*Photo*



FLORIDA POWER & LIGHT COMPANY

AUTH.	NO	DATE	REVISION	BY	CH	APP

8312220117-02





Turkey Point Unit No. 3 & 4

Inservice Inspection

Relief Request No. 9

A. Component Classification: Class I

1. Examination Category B-B, Table IWB-2600  
1974 Edition through Summer 1975 Addenda
2. Examination Category B-F, Table IWB-2600  
1974 Edition through Summer 1975 Addenda
3. Examination Category B-D, Table IWB-2600  
1974 Edition through Summer 1975 Addenda
4. Examination Category B-J, Table IWB-2600  
1974 Edition through Summer 1975 Addenda
5. Examination Category B, D, F, J, Table 4.2-1  
(1970 Edition and Winter 1970) PTP-3/4  
Technical Specification

B. EXAMINATION REQUIREMENTS:

1. Code Item No. B3.1 Volumetric Examination, to include 10% of the length of each longitudinal shell weld and meridional head weld and 5% of the length of each circumferential shell weld and head weld.
2. Code Item No. B3.3 Volumetric and surface examination to include 100% of the circumference weld.
3. Code Item No. B3.2 Volumetric, to include 100% of the volume.  
All nozzles shall be examined during the inspection interval.
4. Code Item No. B4.6 Volumetric Examination, to include 25% of the circumferential joints including the adjoining 1 ft. sections of longitudinal joints and 25% of the pipe branch connection joints.
- 4a. Code Item No. B4.7 Surface Examination, to include 25% of the circumferential joints including the adjoining 1 ft. sections of longitudinal joints and 25% of the pipe branch connection joints.

TECHNICAL SPECIFICATION REQUIREMENTS

5. Code Item No. 3.1 Volumetric Examination, is limited to the circumferential weld attaching the tube sheet to the channel head 5% per interval.
- 5a. Code Item No. 3.3 Visual, Surface, Volumetric Examination includes 25% of nozzle to safe-end welds.



5b. Code Item No. 3.2 The primary nozzles are cast with the head. No inspections are planned.

5c. Code Item No. 4.2 Visual and Volumetric Examination includes circumferential and longitudinal pipe welds.

C. RELIEF REQUESTED: REGENERATIVE HEAT EXCHANGER - see attachment 4

In lieu of Volumetric and Surface Examination requirements, Florida Power & Light Co. opts to perform:

- 1) A Visual Examination (VT-2) which has been satisfactorily completed during the system hydro pressure test (1st Inspection Interval).

D. BASIS FOR RELIEF:

The amount of associated effort and supporting work to comply with the code requirements is not justified for the following reasons:

- 1) To perform these examinations, large expenditures of manhours and man-rem are required with essentially no compensating increase in plant safety, coupled by the increase in radiation (see attachment no. 3 and 4 for comparison in radiation levels from 11-2-82 to 10-9-83) exposure. Additional areas contributing to the justification are as follows:
  - ° Florida Power & Light Company performed examinations on both Unit 3 and 4 heat exchangers during the first and second inspection periods. The coverage and/or the examination limitations are depicted in attachment I. The component design, arrangement and accessibility are not normally conducive to meaningful examination.
  - ° Additional temporary shielding must be installed for any examination, except for the visual method. As a consequence, this would reduce the access to the component for examination due to existing space conditions.
  - ° The component has to be uninsulated for examinations. Typically, surfaces also have to be conditioned resulting in additional man-rem and creating significant cleanliness problems.

E. ALTERNATE EXAMINATIONS:

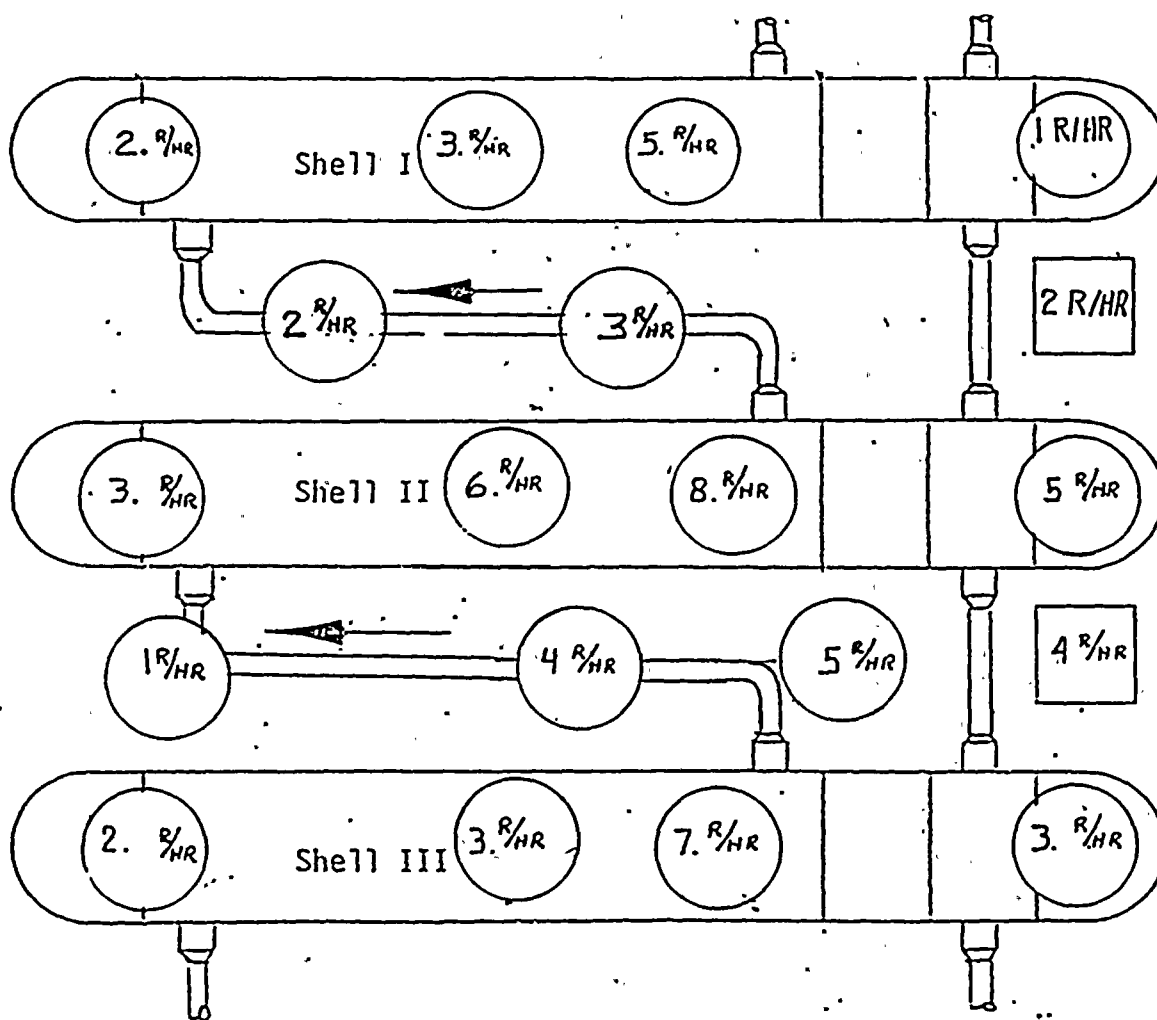
- 1) Perform a Visual Examination, (VT-2) in accordance with section XI of the ASME boiler and pressure vessel code.

F. IMPLEMENTATION SCHEDULE:

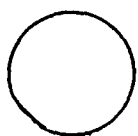
At or near the end of the inspection interval.



ATTACHMENT 3



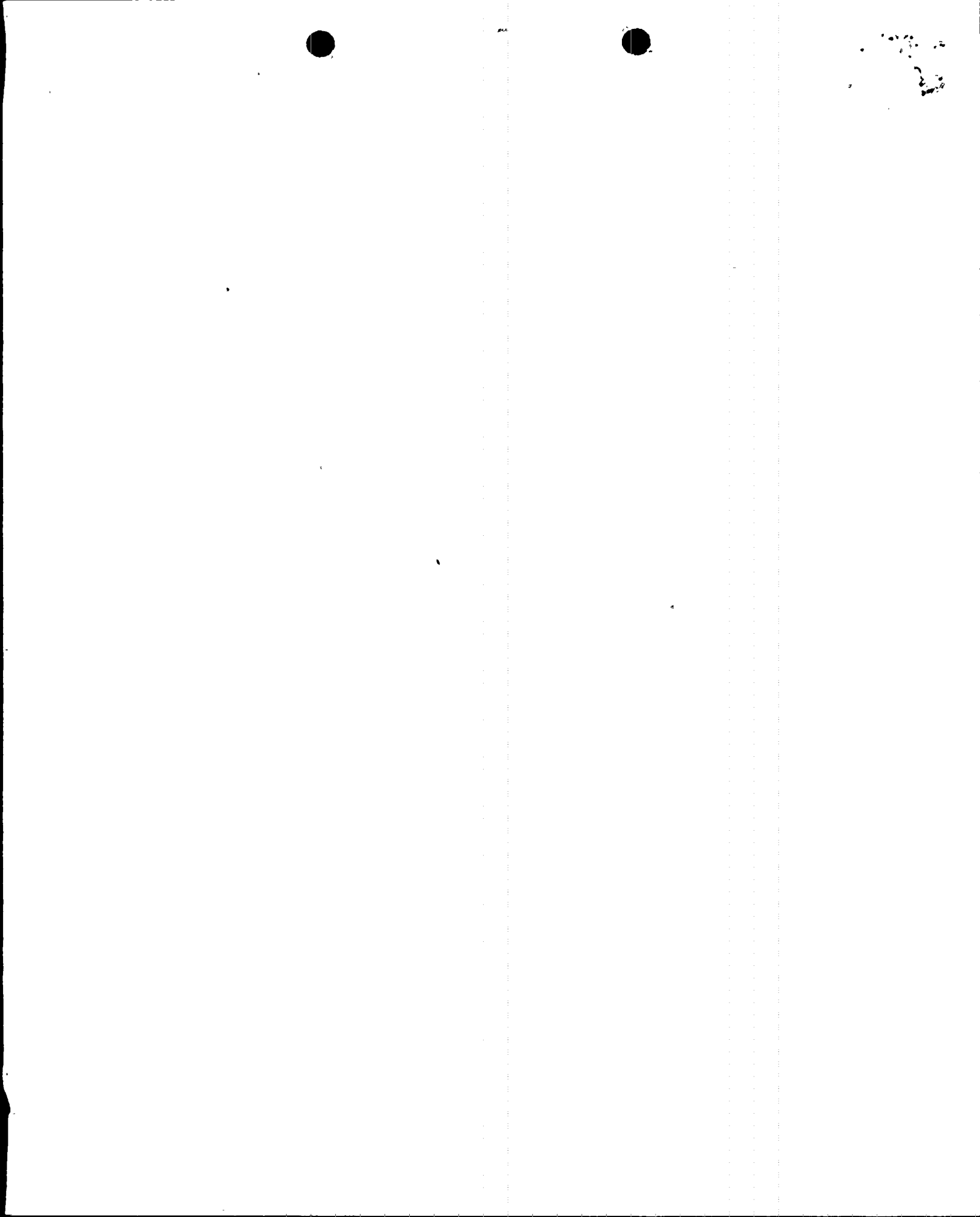
LEGEND



= REM/HR AT CONTACT

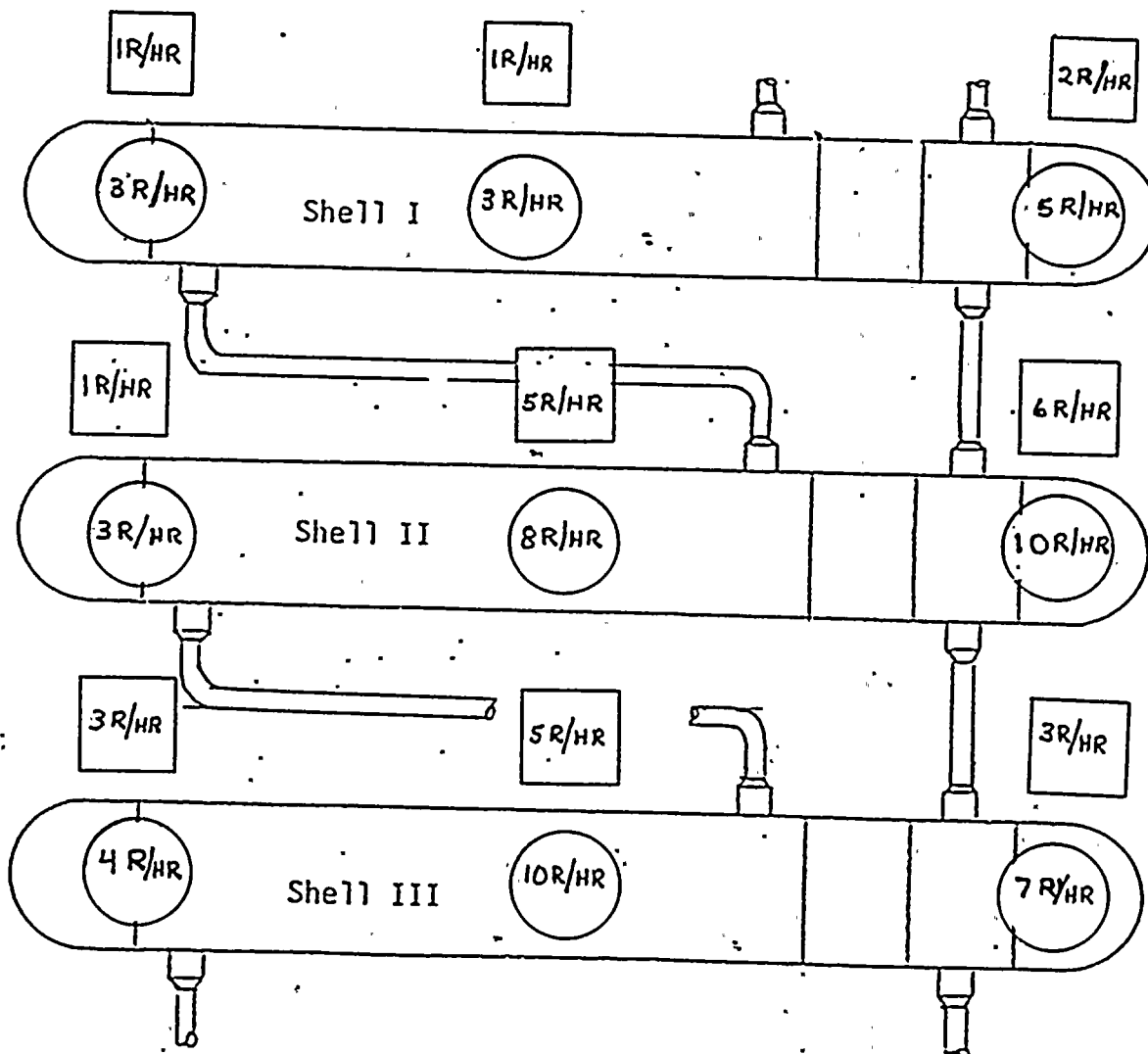


= REM/HR AT 18"



REGENERATIVE HEAT EXCHANGER RADIATION SURVEY AS OF 10-9-83

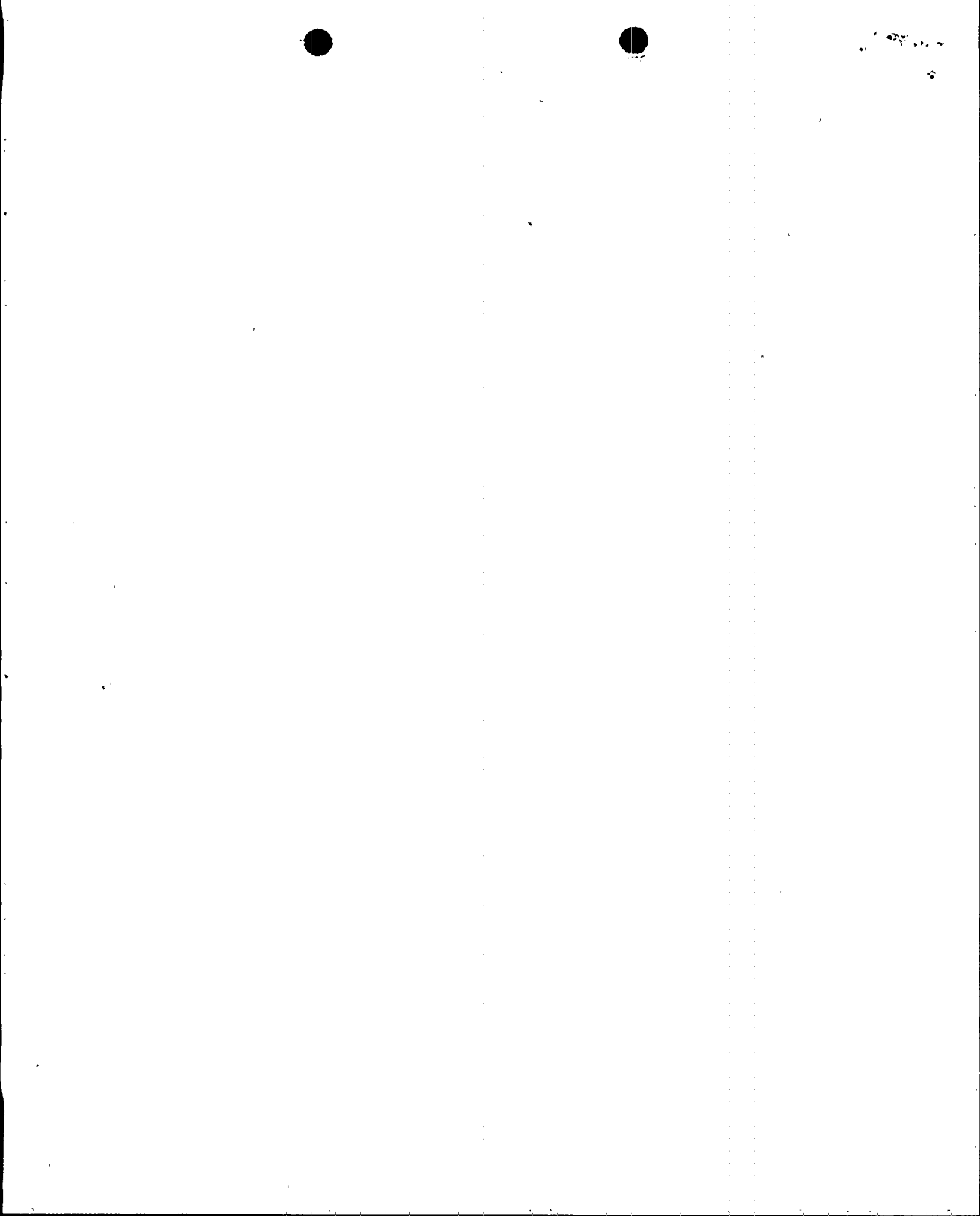
ATTACHMENT 4.



LEGEND

○ = R/HR AT CONTACT

□ = R/HR AT 18"





"IDENTIFICATION OF ALL WELDS"

## Unit #3/4 Regenerative Heatexchanger

<u>Head To Shell</u>	<u>Shell To Tube Sheet</u>	<u>Tube Sheet To Tube Sheet</u>	<u>Tube Sheet To Head</u>
RGX-(I)-1	RGX-(I)-2	RGX-(I)-3	RGX-(I)-4
RGX-(II)-1	RGX-(II)-2	RGX-(II)-3	RGX-(II)-4
RGX-(III)-1	RGX-(III)-2	RGX-(III)-3	RGX-(III)-4

<u>Shell I</u>	<u>Shell II</u>	<u>Shell III</u>
Nozzle-Welds	RGX-(II)-9	RGX-(III)-9
RGX-(I)-9	RGX-(II)-10	RGX-(III)-10
RGX-(I)-10	RGX-(II)-11	RGX-(III)-11
RGX-(I)-11	RGX-(III)-12	RGX-(III)-12
RGX-(I)-12		

## Nozzle - Pipe

Interstage Piping

<u>Shell I</u>	<u>Shell II</u>	<u>Shell III</u>	<u>Integrally Welded Supports</u>
RGX-(I)-7	RGX-(II)-5	Nozzle-pipe	RGX-(I)-Lug
RGX-(I)-8	RGX-(II)-6	RGX-(III)-5	RGX-(II)-Lug
RGX-(I)-9	RGX-(II)-7	RGX-(III)-6	RGX-(III)-Lug
	RGX-(II)-8		

Clamp Restraint

RGX-(I)-CR  
 RGX-(II)-CR  
 RGX-(III)-CR

