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50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251
AUTH. NAME AUTHOR AFFILIATION
WOODY, C. O. Florida Power & Light Co.
RECIP. NAME RECIPIENT AFFILIATION
THOMPSON, H. L. Division of Pressurized Water Reactor Licensing - A (post 8

SUBJECT: Forwards Relief Requests 15, documenting that conformance w/certain ASME Code requirements re safety-related snubber testing impractical. Testing of addl 10% of snubbers in event of failure does not address different snubber types. Fee paid

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FLORIDA POWER & LIGHT COMPANY

JAN 16 1986

L-86-14

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

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

Dear Mr. Thompson:

Pursuant to 10 CFR 50.55a (g) (5) (iii), Florida Power and Light Company has determined that conformance with certain ASME Code Requirements for Turkey Point Units 3 and 4 regarding safety-related snubber testing is impractical. Accordingly, we have prepared Relief Request Number 15 to address those requirements. The request is attached.

We ask that you review and approve this request for relief in conjunction with a related request to modify the Turkey Point Technical Specifications submitted on November 21, 1985 (FPL Letter No. L-85-407).

In accordance with 10 CFR 170.12 (c), a check for $150.00 is attached.

Should you or your staff have any questions regarding this request, please call us.

Very truly yours,

C. O. Woody
Group Vice President
Nuclear Energy

COW/TCG/cab

cc: Harold F. Reis, Esquire
Dr. J. Nelson Grace, NRC Region II

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TCG3/023/1

TURKEY POINT UNITS 3/4
SECOND INSPECTION INTERVAL
INSERVICE INSPECTION

Relief Request No. 15

A. COMPONENT IDENTIFICATION

- ASME Section XI, 1980 Edition through winter 1981 Addenda
- IWF-5000 Inservice Test Requirements
- ASME Class 1, 2 and 3
- Mechanical shock arrestors (snubbers)

B. TESTING REQUIREMENTS

- IWF-5400(c) - Snubbers that fail the inservice test of (b) above shall be repaired in accordance with IWF-4000 and retested. An additional sample of 10% of the total number of snubbers shall be tested at that time. Additional sample testing shall be continued until all units within the sample have met the requirements of (b) above.

C. RELIEF REQUESTED

Relief is requested from the additional sample of 10% of the total number of nonexempt (IWF-1230) snubbers.

D. BASIS FOR RELIEF

1. The code requirements to test an additional 10% of the total snubber population in the event of a failure does not take into account the difference in the operating characteristics of different types of snubbers and their relative susceptibility to various service-induced failure mechanisms.

2. There are substantial differences, based on manufacture and design, specifically in the functional operation and dynamic response of the load of snubbers. A snubber of one design may tend toward failure under a given set of conditions while a snubber of a different design may be essentially unaffected by those same conditions.

3. In addition to item 2 above, conditions which lead to the failure of a susceptible snubber may sometimes be demonstrated to be consistent with conditions unique to the system in which it is installed.

4. Failure evaluation may indicate that snubbers of a certain type have a tendency to fail when exposed to a certain combination of temperature and vibration. When this evaluation clearly establishes that this failure exists only in a certain system, then it becomes evident that the additional sample should be taken from the susceptible population. Snubbers of the same type in other systems, that are exposed to different operating conditions, should be adequately addressed in the original test sample.

Relief Request No. 15 CONTINUED

5. The NRC Standard Technical Specifications for Westinghouse requires testing of the additional 10% of the snubber population to be conducted on the same type of snubber as the snubber that failed.

6. Florida Power & Light Company feels that the additional sampling as required by IWF-5400(c) does not adequately provide for a realistic level of confidence for locating, and correcting conditions as described above.

7. Florida Power & Light Company feels that these alternative sampling methods described below are consistent with the NRC position as evidenced by the Westinghouse Standard Technical Specifications.

E. ALTERNATIVE METHODS

1. Conduct a visual (VT-3) examination of all snubbers during each refueling outage.

2. During the scheduled functional test, a snubber failure is identified, an additional 10% sample of the same type of snubber as that which failed will be tested as required by plant technical specifications.

3. An engineering evaluation shall be made of each failure to meet the functional test acceptance criteria to determine the cause of the failure. The results of this evaluation shall be used, if applicable, in selecting snubbers to be tested in an effort to determine the operability of other snubbers irrespective of type which may be subject to the same failure mode.

4. Should the results of the evaluation indicate that failure was caused by either manufacturer or design deficiency, further action shall be taken, if needed, based on manufacturer or engineering recommendations.

5. The alternative examinations and tests provide assurance of an acceptable level of quality and safety.

F. IMPLEMENTATION SCHEDULE

1. Conduct a 100% visual (VT-3) examination of all snubbers each refueling outage.

2. During the second inspection interval all functional testing and the additional testing shall be inaccordance with PTP 3/4 plant technical specification.

G. ATTACHMENTS

None