

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9007170323 DOC. DATE: 90/07/12 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

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 RECIP. NAME RECIPIENT AFFILIATION  
 Document Control Branch (Document Control Desk)

SUBJECT: Forwards addl info re responses to emergency power sys enhancement project.

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L-90-255

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D. C. 20555

Gentlemen:

Re: Turkey Point Units 3 and 4  
Docket No. 50-250 and 50-251  
Emergency Power System Enhancement Project

By letter L-90-228, dated July 3, Florida Power and Light provided responses to questions on the piping codes used for the Emergency Power System Enhancement Project. Enclosed please find additional information related to the above responses.

Should there be any questions, please contact us.

Very truly yours,

K. N. Harris  
Vice President  
Turkey Point Plant Nuclear

KNH/GS

enclosure

cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC  
Senior Resident Inspector, USNRC, Turkey Point Plant

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Question 1: What is the basis for using ANSI B31.1 in lieu of ASME Section III for installation?

Answer 1: Installation of safety related piping and supports for the new EDG's will be to ANSI B31.1 in lieu of ASME Section III. Turkey Point is an ANSI B31.1 code plant as originally licensed. There are no programs in place to perform ASME code work, and neither FPL nor any of our contractors have their "N" or "U" stamps authorized at Turkey Point. FPL has reviewed and compared installation requirements between ASME Section III Class C and ANSI B31.1. The results of this review are contained in Attachments 1 and 2. The installation requirements for both codes are essentially equivalent. Where minor differences occur (ASME requires additional weld inspection on butt welds greater than 2" NPS and a larger weld size for fillet welds joining pipe to flanges) FPL has added the additional technical requirements on a case by case basis to the appropriate installation documents. Although the piping installation will not be "N" stamped per the ASME code, the installation is in accordance with 10CFR50 Appendix B with regards to quality assurance. FPL therefore believes that there is little value for full compliance with the ASME codes when compared to the above methodology.

Question 2: What Inservice Inspection requirements will be applied to the new emergency diesel piping systems?

Answer 2: The Inservice Inspection requirements of Section XI IWD-2500 will be applied as follows:

- 1) Fuel Oil Transfer System up to the EDG Skid
- 2) Air Start System up to the EDG Skid
- 3) Cooling Water System up to the EDG Skid
- 4) Exhaust System up to the EDG Skid



## COMPARISON OF HANGER INSTALLATION REQUIREMENTS

<u>Subject</u>	<u>ASME Sect III C1 3</u>	<u>ANSI B31.1/MSS-SP-58</u>	<u>Comparison</u>
Welding Qualifications - Procedures & Performance	NF-4320	5.2.1 (MSS-SP-58)	Identical
Welding Filler Material	NF-4125	5.2.1 (MSS-SP-58)	Equivalent
Preheat	Appendix D	5.2.4 (MSS-SP-58)	Equivalent
Post Weld Heat Treatment	Table NF-4622.7(b)-1	5.2.4 (MSS-SP-58)	Equivalent - Not Required
Butt Weld Alignment	Table NF-4232-1	Not Specified	ASME is equivalent to B31.1
Butt Weld Reinforcement	NF-4426	Not Specified	ASME maximum is 0.030" less than B31.1 maximum
Undercut	NF-4424(c)	127.4.2(D.3)	Identical
Weld Surfaces	NF-4424	5.3.2(MSS-SP-58)	Identical
Weld NDE	NF-5230	5.3.2 (MSS-SP-58)	ASME requires surface exam MPT/PT for welds greater than 1" thick. All other welds get visual inspection
Code Stamping	NF-8100	Not Addressed	ASME requires installer to have an ASME approved Quality System

## COMPARISON OF PIPING INSTALLATION REQUIREMENTS

<u>Subject</u>	<u>ASME Sect III C1 3</u>	<u>ANSI B31.1</u>	<u>Comparison</u>
Welding Qualifications - Procedures & Performance	ND-4320	127.5	Identical as practiced by FPL
Welding Filler Material	ND-4125	127.2.1	Identical as practiced by FPL
Socket Weld Details	Fig. ND-4427-1	Fig. 127.4.4(c)	Identical Larger weld size for flanges required by ASME (30% larger)
Preheat	Appendix D	131.4.2 & 131.4.8	Identical
Post Weld Heat Treatment	Table ND-4622.7(b)-1	Table 132	Identical - Not Required
Butt Weld Alignment	ND-4233	127.3.1(c)	Identical
Butt Weld Reinforcement	ND-4426.2	Table 127.4.2	ASME maximum is 0.030" less than B31.1 for material less than 1/2" thick
Undercut	ND-4424(c)	127.4.2(D.3)	Identical
Weld Surfaces	ND-4424	127.4.2(D)	Identical
Weld NDE	ND-5222	Table 136.4	ASME requires PT/MT for butt welds over 2" NPS. All other welds require visual inspection
NDE Qualifications Procedures & Performance	ND-5111	136.1	Identical
Hydrotest Pressure	ND-6221	137.3.4	B31.1 requires higher pressure 1.5 X design vs. 1.25 X design for ASME. Owner may change pressure for B31.1
Hydro Hold Time	ND-6223	137.3.5	Identical

## COMPARISON OF PIPING INSTALLATION REQUIREMENTS

<u>Subject</u>	<u>ASME Sect III C1 3</u>	<u>ANSI B31.1</u>	<u>Comparison</u>
Material Identification	ND-4122	Not Addressed	ASME requires traceability of material
Code Stamping	ND-8100	Not Addressed	ASME requires installer to have an ASME approved Quality System