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 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250
 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251

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

SUBJECT: Forwards revised Relief Requests VR-2, VR-6, VR-9, VR-11, VR-12, VR-13, VR-14, VR-22 (withdrawn) & new Relief Requests VR-29 through VR-32 for inservice testing program.

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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
Inservice Testing Relief Requests

Attached please find revised relief requests VR-2, VR-6, VR-9, VR-11, VR-12, VR-13, VR-14, VR-22 (withdrawn), and new relief requests VR-29, VR-30, VR-31, and VR-32 for the Inservice Testing (IST) Program. The new and revised relief requests fall into two main categories: those where the surveillance is impractical without the use of alternative techniques (and suitable alternative techniques are not yet available), and those where the frequency of the surveillance imposes a significant hardship.

The Nuclear Regulatory Commission (NRC) granted interim relief for the corresponding relief requests (not including the new relief requests) by letter dated August 20, 1990. Subsequent to this, on September 20, 1991, the NRC issued a Safety Evaluation (SE) of the IST program. This SE confirmed the granting of the unrevised relief requests. The SE also stated that the reliefs would "be granted for 12 months, or until the end of the next refueling outage (for each unit), whichever is longer. This interim period starts on August 20, 1990." The first Unit 3 refueling following August 20, 1990 is scheduled for August, 1992; however Unit 4 completed a refueling outage on October 29, 1991. Turkey Point Technical Specifications (TS) require surveillances of the valves discussed in the above relief requests on a schedule in accordance with ASME Code Section XI. This requires surveillance of the Unit 4 valves without the benefit of the reliefs, in some cases quarterly and in others during each cold shutdown. The required date for the first quarterly surveillances is January 29, 1992 (not taking credit for the TS permitted 25% grace period).

New relief requests VR-29 and VR-30 are being submitted due to the recently identified impracticality of the testing required by the current program. New relief request VR-31 is being submitted because of a recent interpretation by the NRC which stated that cycling of stop-check valves by handwheel operation is not an acceptable method of demonstrating valve closure. New relief request VR-32 is being submitted because the valves covered by

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an FPL Group company

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the request were installed during the recently completed Dual Unit Outage. As no alternative method is available for these valves, relief is being requested from the above requirement. As no relief has been requested or granted for the valves covered by the above relief requests, surveillance of these valves is required quarterly, with the first surveillance due on January 2, 1992 (not taking credit for the TS permitted 25% grace period) for the Unit 3 valves. As performance of the surveillances without the benefit of the reliefs is impractical or imposes a hardship, FPL requests resolution of the issues raised in the revised relief requests prior to January 21, 1992.

The short-term alternative testing discussed in several of the relief requests is disassembly, inspection, and manual exercise of the valve. Prior to valve closure, the cleanliness and proper orientation of each valve is verified.

FPL expects the long-term resolution of the issues raised in the relief requests to be addressed through alternative surveillance techniques. FPL has been actively involved in the development and evaluation of non-intrusive check valve diagnostics through its participation in the Nuclear Industry Check Valve Group since its inception in 1988, and has provided guidance and funding for its evaluation of non-intrusive diagnostic technologies. FPL also holds memberships in the Air Operated Valve (AOV) Users Group and Solenoid Operated Valve (SOV) Technical Advisory Committee. The Turkey Point Instrumentation and Controls Department has purchased an ABB Aircet AOV diagnostic system and is using this device on a limited basis until proficiency is developed. As a member of the SOV advisory committee, FPL is staying abreast of current technologies and practices with regards to SOV performance testing techniques.

If you should have any questions, please contact us.

Very truly yours,

T.F. PLUNKETT by VAK

T. F. Plunkett
Vice President
Turkey Point Nuclear

TFP/GS

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

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