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AUTH. NAME AUTHOR AFFILIATION
PLUNKETT, T.F. Florida Power & Light Co.
RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Forwards request for relief from ISI exam & testing
requirements for regenerative HXs, interconnecting piping &
terminal ends, as followup to 1984 initial relief request.

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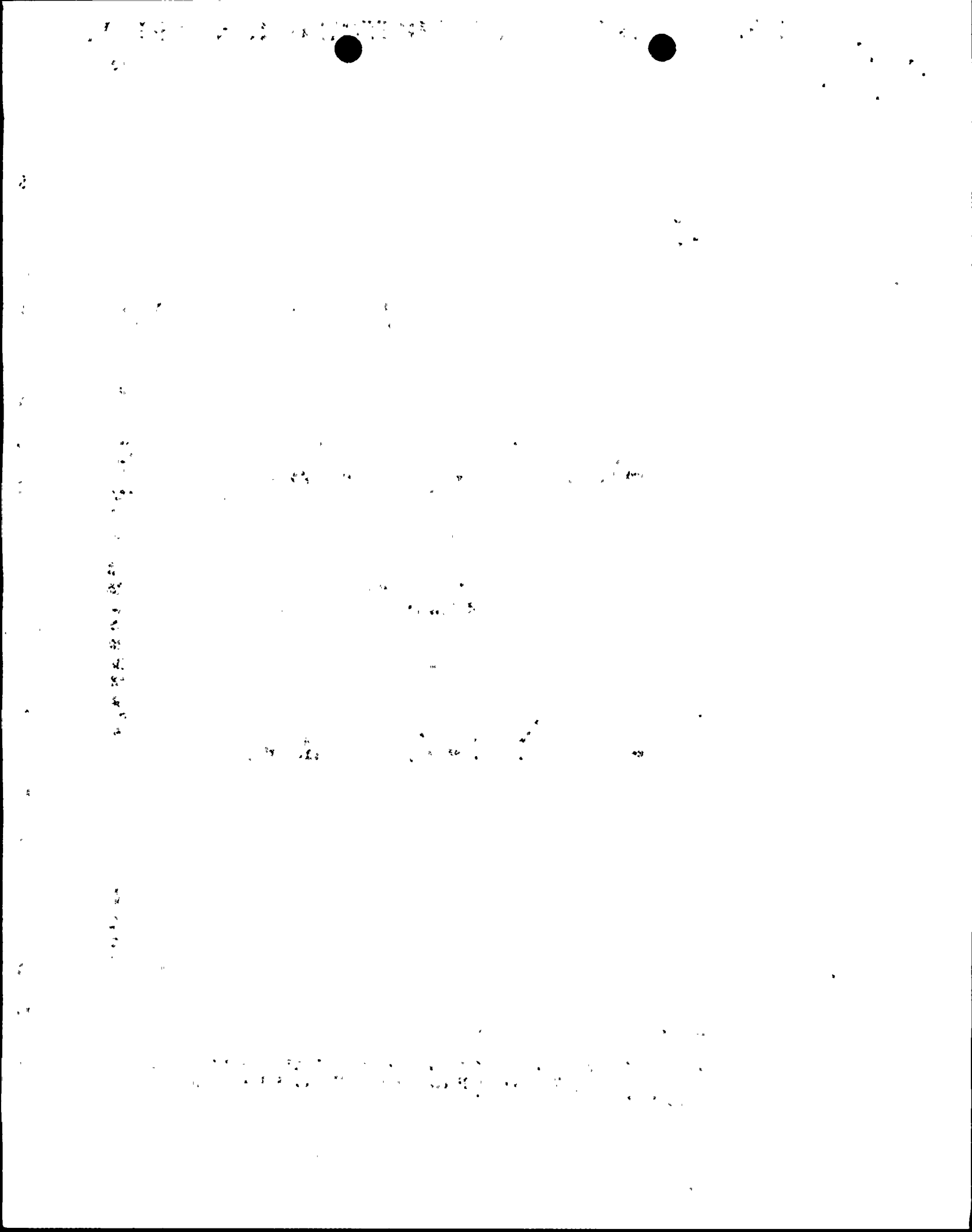
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APR 01 1993

L-93-066
10 CFR 50.55a

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

Gentlemen:

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

This letter is being submitted in accordance with 10 CFR 50.55a (g) (5) (iv) to request relief from the American Society of Mechanical Engineers (ASME), Boiler and Pressure Vessel (B&PV) Code, Section XI requirements regarding Inservice Inspection examination or testing of the Regenerative Heat Exchangers (RHE), interconnecting piping and terminal ends.

Florida Power and Light Company (FPL) requested and received relief from performing examinations on the Regenerative Heat Exchangers at Turkey Point Units 3 and 4 during the Inservice Inspection Program update in 1984. The relief was requested due to the high exposure which would be incurred in the area of the heat exchanger during an examination, limited room in the RHE area, and known examination limitations. At the time of the initial relief request in 1984, only the vessel itself and the interconnecting piping were included in the request. The terminal ends of the connecting piping were not included. This relief request updates the initial relief request primarily to include the terminal ends but also to reflect current information.

Should there be any questions, please contact us.

Very truly yours,

T. F. Plunkett
Vice President
Turkey Point Nuclear

Attachment

TFP/RJT/rjt

cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC
R. C. Butcher, Sr. Resident Inspector, USNRC, Turkey Point

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an FPL Group company

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TURKEY POINT UNITS 3 & 4
SECOND INSPECTION INTERVAL
INSERVICE INSPECTION

RELIEF REQUEST #3

A. Component Identification:

Class 1 - Regenerative Heat Exchangers and connecting piping
at Turkey Point Nuclear Plants, Units 3 and 4.

B. Examination Requirements:

Rules for Inservice Inspection of Nuclear Power Plant Components, 1980 Edition of ASME Section XI with Addenda through Winter 1981

IWB-2500 Examination and Pressure Test Requirements

Exam Category	Item No.	Examination Requirements
B-B	B2.51 B2.61	Volumetric examination, to include 100% of the length of circumferential tube sheet to shell welds and head to shell welds.
B-D	B3.150 B3.160	Volumetric examination, to include 100% of each nozzle to vessel weld and nozzle inside radius area.
B-H	B8.40	Volumetric or surface examination to include 100% of each integrally welded support of one heat exchanger.
B-J	B9.21	Surface examination to include 100% of weld surface on approximately 25% of the total interconnecting piping joints.
B-J	B9.40	Surface examination of essentially 100% of the weld length of selected welds during each interval.

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Exam Category	Item No.	Examination Requirements
B-J	Footnote 1	Examinations shall include the following: (a) All terminal ends in each pipe or branch run connected to vessels.
N/A	Terminal Ends	The extremities of piping runs that connect to structures, components, or pipe anchors, each of which acts as a rigid restraint or provides at least 2° of restraint to piping thermal movement (taken from IWA-9000, 1989 Edition of ASME Section XI)

C. Relief Requested:

Relief is requested from the Code required examinations on the Regenerative Heat Exchanger shell welds, interconnecting piping welds, support welds, and connecting terminal end piping welds.

Item No.	Examination Areas	Turkey Point Unit 3	Turkey Point Unit 4
B2.51	Head to Shell	6 welds	6 welds
B2.61	Shell to Tubesheet welds	6 welds	6 welds
B3.150	Nozzle to Shell welds	12 welds	12 welds
B3.160	Nozzle Inside Radius Section	12 areas	12 areas
B8.40	Welded Support	3 welds	3 welds
B9.21	Interstage Piping, butt welds	10 welds	10 welds
B9.40	Socket Welds	2 welds	2 welds
See Tables 1 and 2 for detailed listings of welds.			

1. 2. 3. 4. 5. 6.

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D. Basis for Relief:

The Regenerative Heat Exchanger is located in a locked high radiation area. This area has a general field of 2 Rem/hr with contact dose rates of up to 10 Rem/hr, is highly contaminated, and requires the use of a full face respirator. Turkey Point Health Physics (HP) rules require the constant presence of an HP technician during entry to this area. Other conditions in this area include limited accessibility to the examination areas due to the close proximity of the adjacent wall and floor, limited work area due to cubicle walls built to shield personnel in adjacent areas, and interference from other lines and supports in the immediate area.

During construction of Turkey Point Units 3 and 4, asbestos insulation was used extensively. Asbestos insulation is present in the area of the Regenerative Heat Exchanger. Additional protection is required for personnel entering this area to avoid possible spreading and ingestion of this hazardous material (i.e., an extra layer of protective clothing, tenting, HEPA filters.)

Performing Code required examinations would require large expenditures of man-hours and accumulated Man-Rem dose. The welds must be uninsulated for examination and temporary shielding and scaffold installed. Effective shielding reduces accessibility to the examination areas. Proper surface conditioning will add to the time and exposure required to perform valid surface and volumetric examinations. The area must be tented to avoid spreading of asbestos fibers found in the insulation. The design and arrangement of the Regenerative Heat Exchanger are not conducive to meaningful examinations (see sketches 3-V11 and 4-V11).

FPL has performed examinations on the Regenerative Heat Exchangers for both Turkey Point Units 3 and 4 during the first inspection interval (approximately early 1972 through late 1983) before the original relief request was approved. This experience showed that the design arrangement and accessibility are not conducive to meaningful examinations. The configuration, limited accessibility, high radiation levels, and interference from supports, walls, and the floor do not allow the Code required 100% volumetric and/or surface examinations (see drawing RR-3.DWG).

Terminal ends in Category B-J welds are to receive surface and/or volumetric examinations. FPL has performed examinations on terminal end welds in other components in the Chemical Volume and Control system. No indications have

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been found. Since 1985, VT-2 and VT-3 examinations have been performed on the terminal end welds listed in this relief. These examinations were performed in accordance with the approved relief request, which required FPL to look for evidence of leakage around the Regenerative Heat Exchanger just after shutdown for a refueling outage, and a second time during the system pressure test at unit startup.

During the 1991 outages of both units, the system hydrostatic tests were performed on the affected systems. No evidence of leakage from the Regenerative Heat Exchanger or its attached piping has been noted in either unit during any of the previous examinations.

Performing the alternative examinations will not increase the health and safety risk to the public.

**Estimated Time and Man-REM for Regenerative Heat
Exchanger Weld Examinations**

Job Description	Dose Rate	Man hours	Estimated Man-Rem
Tenting and HEPA Filter Installation	0.5	8.0	4.00
Insulation Removal (Asbestos)	2.0	8.0	16.00
Scaffold Installation	0.5	3.0	1.50
Lead Installation	2.0	5.0	10.00
Surface Preparation for Exam	2.5	16.0	40.00
ISI Examination	2.5	5.5	13.75
Install Insulation	2.0	12.5	25.00
Remove Scaffold	0.5	1.5	0.75
Remove Tent and HEPA Filter	0.5	2.5	1.25
Temporary Services	0.5	0.5	0.25
Lead Removal	2.0	2.0	4.00
Clean Up	1.0	2.0	2.00
Totals		66.50	118.50

Note: Dose rate is expressed in Rem/hour. These estimates are valid for both units.

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E. Alternative Examinations:

Florida Power and Light will perform a VT-3 examination at the beginning of the outage for leakage and boric acid accumulation, and a VT-2 examination during the system leakage test. These examinations are currently performed in accordance with the approved relief request on the Regenerative Heat Exchangers.

F. Implementation Schedule:

The alternative examinations will be performed during each refueling outage.

G. Attachments:

Unit 3

Unit 4

Dwg. No. 3-V11

Dwg. No. 4-V11

Dwg. No. 3-A44

Dwg. No. 4-A40

Dwg. No. 3-A46

Dwg. No. 4-A41

Dwg. No. 3-A47

Dwg. No. 4-A42

Dwg. No. 3-A48

Dwg. No. 4-A43

Examination limitation drawing - RR-3.DWG

H. References:

1. USNRC letter to Mr. J. W. Williams, Jr., Vice President, Florida Power and Light, granting relief from ASME Section XI requirements, dated February 4, 1985.
2. TAC Nos. M49133, M49936, M54677, M54678, M54973, and M54974.

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Table 1
Regenerative Heat Exchanger Weld Identification

Weld Description	Turkey Point Units 3 & 4 *
Head to Shell	RGX-I-1 RGX-II-1 RGX-III-1
Shell to Tube Sheet - Primary	RGX-I-2 RGX-II-2 RGX-III-2
Tube Sheet to Shell - Secondary	RGX-I-3 RGX-II-3 RGX-III-3
Channel Head Weld Secondary	RGX-I-4 RGX-II-4 RGX-III-4
Shell I Nozzle Welds and Inner Radius	RGX-I-9 RGX-I-10 RGX-I-11 RGX-I-12 RGX-I-9IR RGX-I-10IR RGX-I-11IR RGX-I-12IR
Shell II Nozzle Welds and Inner Radius	RGX-II-9 RGX-II-10 RGX-II-11 RGX-II-12 RGX-II-9IR RGX-II-10IR RGX-II-11IR RGX-II-12IR
Shell III Nozzle Welds and Inner Radius	RGX-III-9 RGX-III-10 RGX-III-11 RGX-III-12 RGX-III-9IR RGX-III-10IR RGX-III-11IR RGX-III-12IR
Shell I Nozzle to Pipe Interstage Piping	RGX-I-7 RGX-I-8

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Weld Description	Turkey Point Units 3 & 4 *
Shell II Nozzle to Pipe Interstage Piping	RGX-II-5 RGX-II-6 RGX-II-7 RGX-II-8
Shell III Nozzle to Pipe Interstage Piping	RGX-III-5 RGX-III-6
Integrally Welded Supports	RGX-I-LUG RGX-II-LUG RGX-III-LUG
* The weld numbers are the same for both units.	

Table 2
Terminal End Piping Welds

Turkey Point Unit 3	Turkey Point Unit 4
3"-CH-1301-1	3"-CH-1402-1
3"-CH-1303-23	3"-CH-1403-24
2"-CH-1301-18	2"-CH-1401-18
2"-CH-1302-1	2"-CH-1402-1

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Attachments

Unit 3

Dwg. No. 3-V11
Dwg. No. 3-A44
Dwg. No. 3-A46
Dwg. No. 3-A47
Dwg. No. 3-A48

Unit 4

Dwg. No. 4-V11
Dwg. No. 4-A40
Dwg. No. 4-A41
Dwg. No. 4-A42
Dwg. No. 4-A43

Examination limitation drawing - RR-3.DWG

LIMITED EXAMINATION FROM SHELL DUE TO NOZZLE, 76%
COVERAGE; LIMITED EXAM ON CAP SIDE DUE TO CONFIGURATION,
LESS THAN 50% COVERAGE, 76% OF WELD LENGTH EXAMINED
ON CAP SIDE DUE TO LUG (TYPICAL THREE WELDS)

LIMITED EXAM ON SHELL DUE
TO CLAMP, 87% COVERAGE
(TYPICAL 4 AREAS)

NO EXAM ON WELD OR NOZZLE SIDE DUE
TO ITS CONFIGURATION, 0% COVERAGE
(TYPICAL 12 AREAS)
LIMITED EXAM ON SHELL DUE
TO CLAMP, 87% COVERAGE
(TYPICAL 4 AREAS)

LIMITED EXAM ON CAP SIDE DUE
TO ITS CONFIGURATION, LESS THAN
50% COVERAGE (TYPICAL 3 WELDS);
53% COVERAGE FROM SHELL SIDE
DUE TO NOZZLES (TYPICAL 3 WELDS)

NO EXAM ON BOTTOM OF LUG
DUE TO ANGLE IRON BRACKET
COVERING WELD, 55% COVERAGE

76% OF SHELL SIDE EXAMINED DUE TO NOZZLE
LIMITATION; NO EXAM ON TUBE SHEET
SIDE DUE TO CLAMP (0% COVERAGE)

LIMITED EXAM ON SHELL DUE
TO CLAMP, 87% COVERAGE
(TYPICAL 4 AREAS)

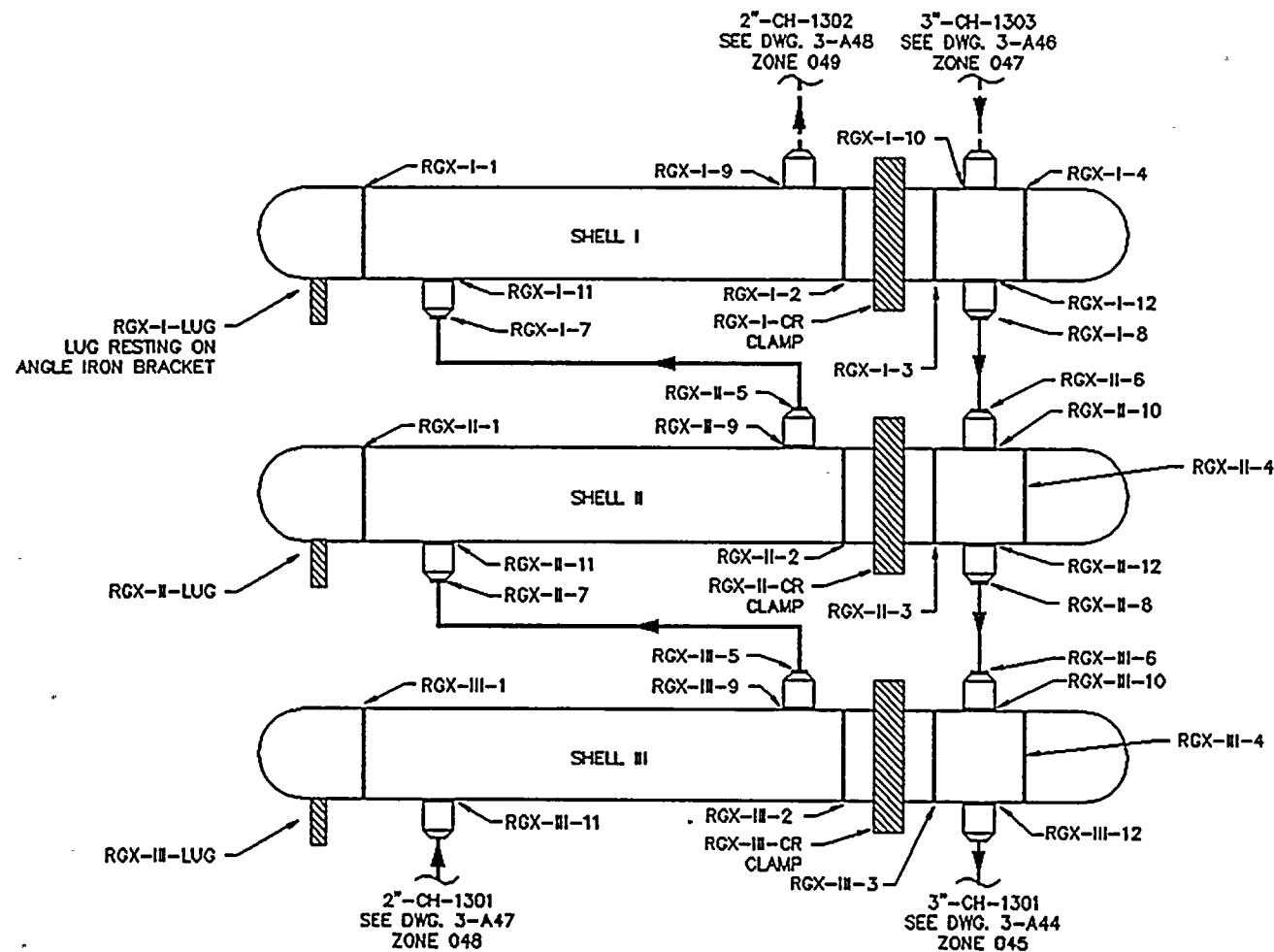
53% COVERAGE FROM SHELL SIDE
DUE TO NOZZLES (TYPICAL 3 WELDS)
NO EXAM FROM TUBESHEET SIDE DUE
TO CLAMP (0% COVERAGE)

TUBESHEET

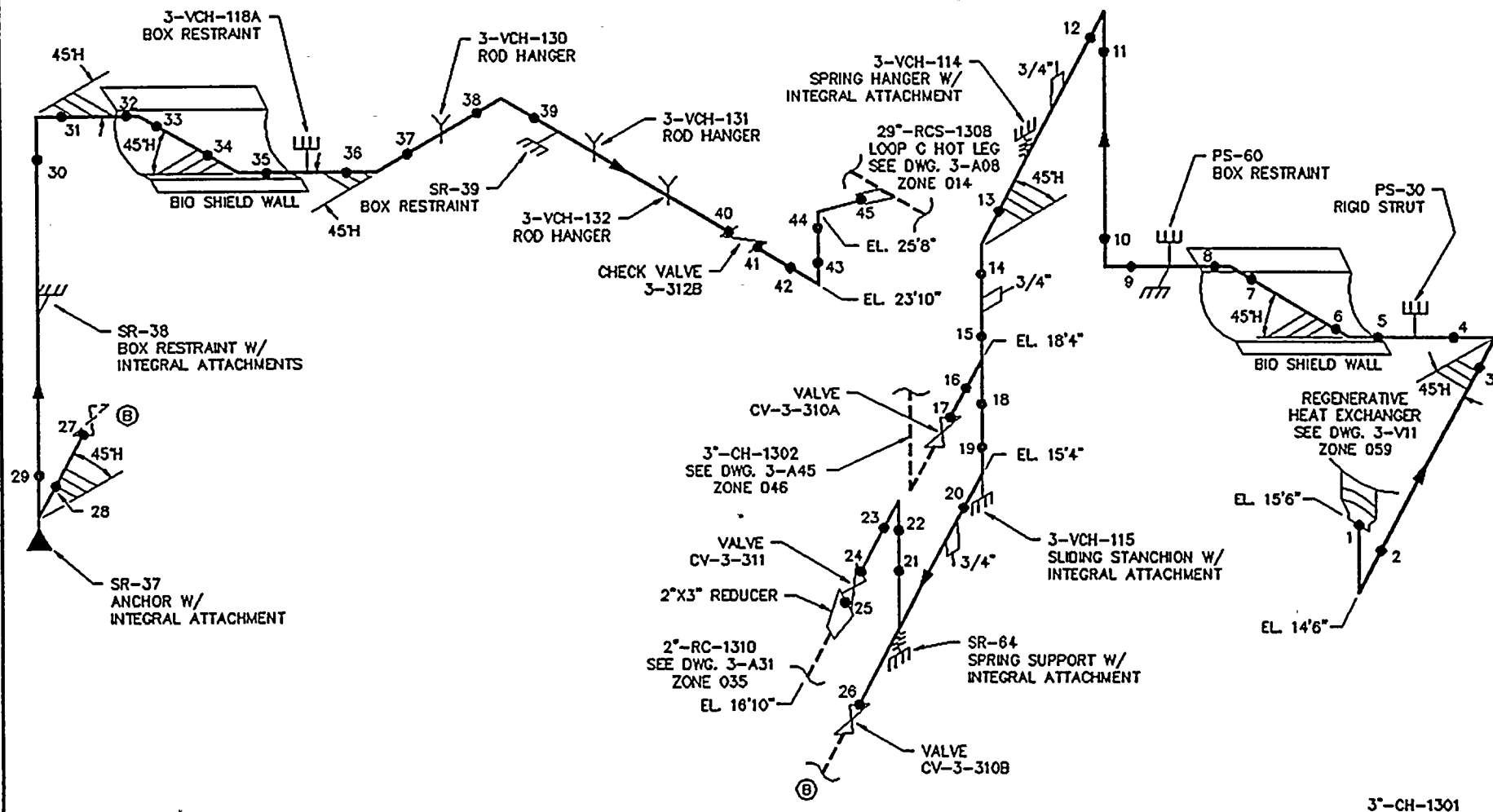
CLAMP

TYPICAL ARRANGEMENT

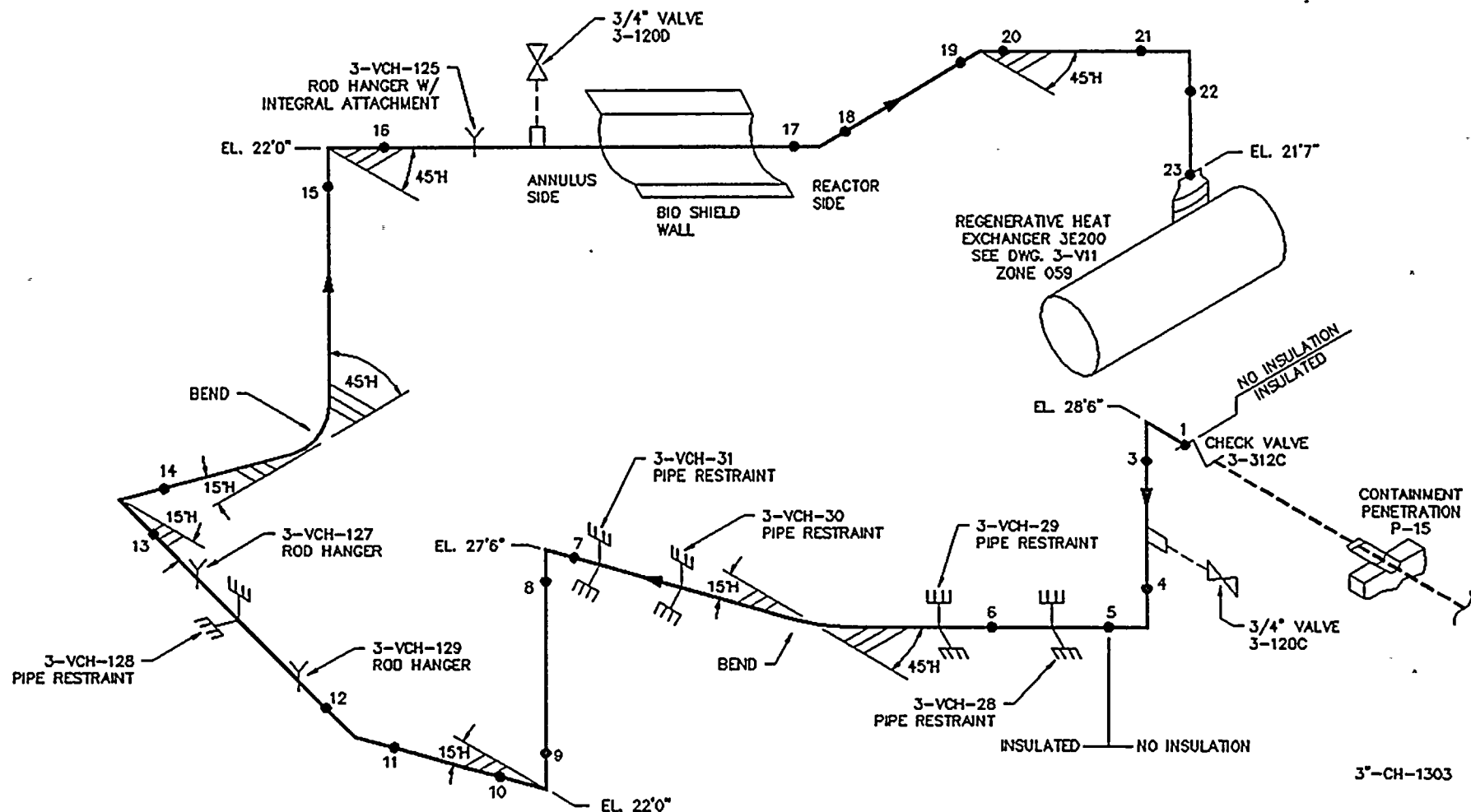
REFERENCE DRAWINGS	NOTES	CAUBRATION BLOCKS AND MATERIAL	FLORIDA POWER & LIGHT TURKEY POINT UNIT 3 & 4		
SENTRY DWG. A04195-A044 REV. 8 SENTRY DWG. A04195-A01-2 ISSUE 8	LOCATION: CONTAINMENT LOCKED HIGH RADIATION AREA SEE RELIEF REQUEST NO. 3 VESSEL IS INSULATED (SOME ASBESTOS)	INTERSTAGE PIPING - 3" SCH 80 INTERSTAGE PIPING CONNECTIONS - 3" SCH 80 SHELL - TP304 OR TP316 HEAD - TP304 OR TP316 PIPING - TP304 OR TP316	TITLE: REGENERATIVE HEAT EXCHANGER DETAIL TYPICAL BOTH UNITS		
	SKETCH IS NOT TO SCALE		DATE: 3/29/93 RLT	ZONE: 059	
			REVIEWED BY: RUSSELL L. TURNER	SKETCH NO.: RR-3.DWG	REVISION: 1



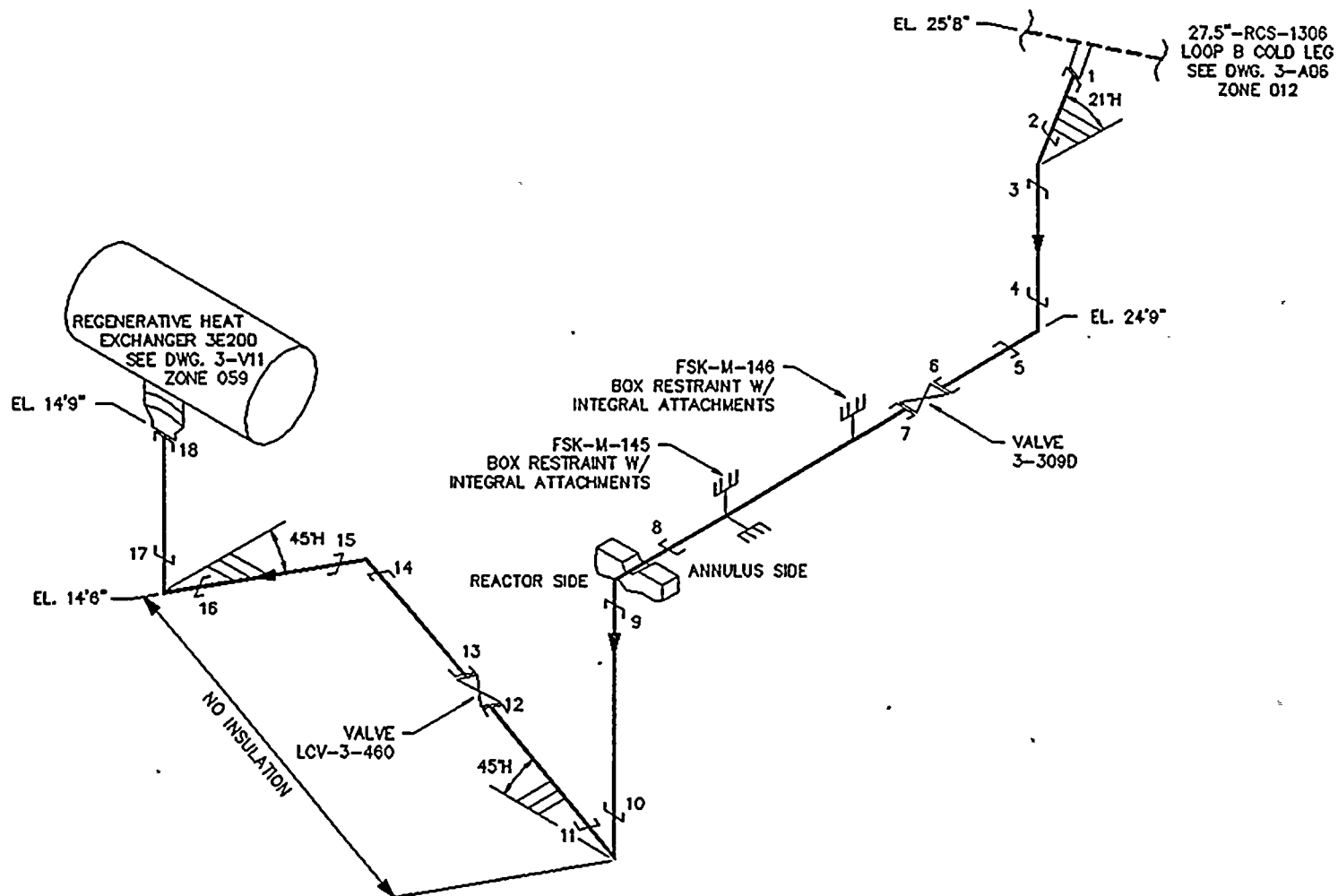
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SENTRY DWG. A04195-A044 REV. 8 SENTRY DWG. A04195-A01-2 ISSUE 8 5813-M-3047 SH. 2	LOCATION: CONTAINMENT LOCKED HIGH RADIATION AREA SEE RELIEF REQUEST NO. 3	INTERSTAGE PIPING - 3" SCH 80 INTERSTAGE PIPING CONNECTIONS - 3" SCH 80 SHELL - TP304 OR TP316 HEAD - TP304 OR TP316 PIPING - TP304 OR TP316	TITLE: REGENERATIVE HEAT EXCHANGER FPL NO. 3E200		
			DATE: 3/29/93	ZONE: 059	
			REVIEWED BY: RUSSELL L. TURNER	SKETCH NO: 3-V11	REVISION: 6



REFERENCE DRAWINGS	NOTES	CAUTION BLOCKS AND MATERIAL	FLORIDA POWER & LIGHT TURKEY POINT UNIT 3		
5613-P-661-S SH. 1 & 2 OF 4 5610-T-E-4501 SH. 1 5610-T-E-4505 SH. 1 5610-M-410-91 SH. 2 (P&ID) 5610-M-420-3 SH. 3 (P&ID) 5610-M-420-214 SH. 3 (P&ID)	STRESS PROBLEM: PS-1/023 LOCATION: CONTAINMENT SYSTEM NO.: 41 & 47 LINE IS INSULATED	3" SCH 160, A376 TP316 SMLS	TITLE: CHEMICAL AND VOLUME CONTROL TO REACTOR COOLANT LOOP C HOT LEG		
			DATE: 1/15/93 RL	ZONE: 045	
			REVIEWED BY: RUSSELL L. TURNER	SKETCH NO: 3-A44	REVISION: 6

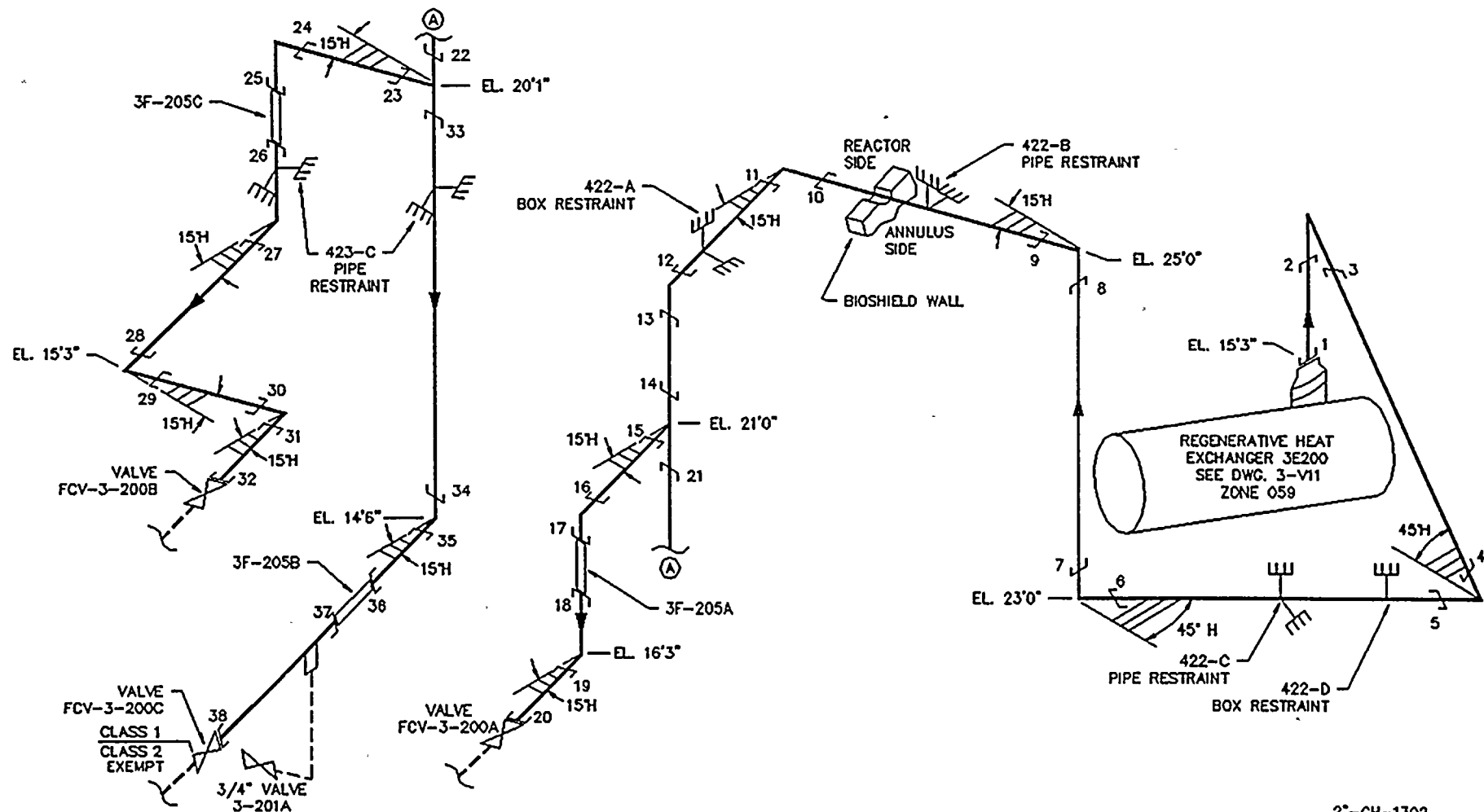


REFERENCE DRAWINGS	NOTES	CAUBRATION BLOCKS AND MATERIAL	FLORIDA POWER & LIGHT TURKEY POINT UNIT 3		
5813-P-594-S SH. 1 OF 1 5610-T-E-4505 SH. 1 5610-M-420-214 SH. 3 (P&ID) 5610-M-420-3 (P&ID)	STRESS PROBLEM: 022 LOCATION: CONTAINMENT SYSTEM NO.: 47 LINE IS INSULATED EXCEPT WHERE NOTED WELD 2 DOES NOT EXIST	3" SCH 160, A376 TP316 SMLS	TITLE: CHEMICAL AND VOLUME CONTROL TO REGENERATIVE HEAT EXCHANGER		
			DATE: 2/26/92 RLI/PEH	ZONE: 047	
			REVIEWED BY: RUSSELL L. TURNER	DRAWING NO.: 3-A46	REVISION: 6




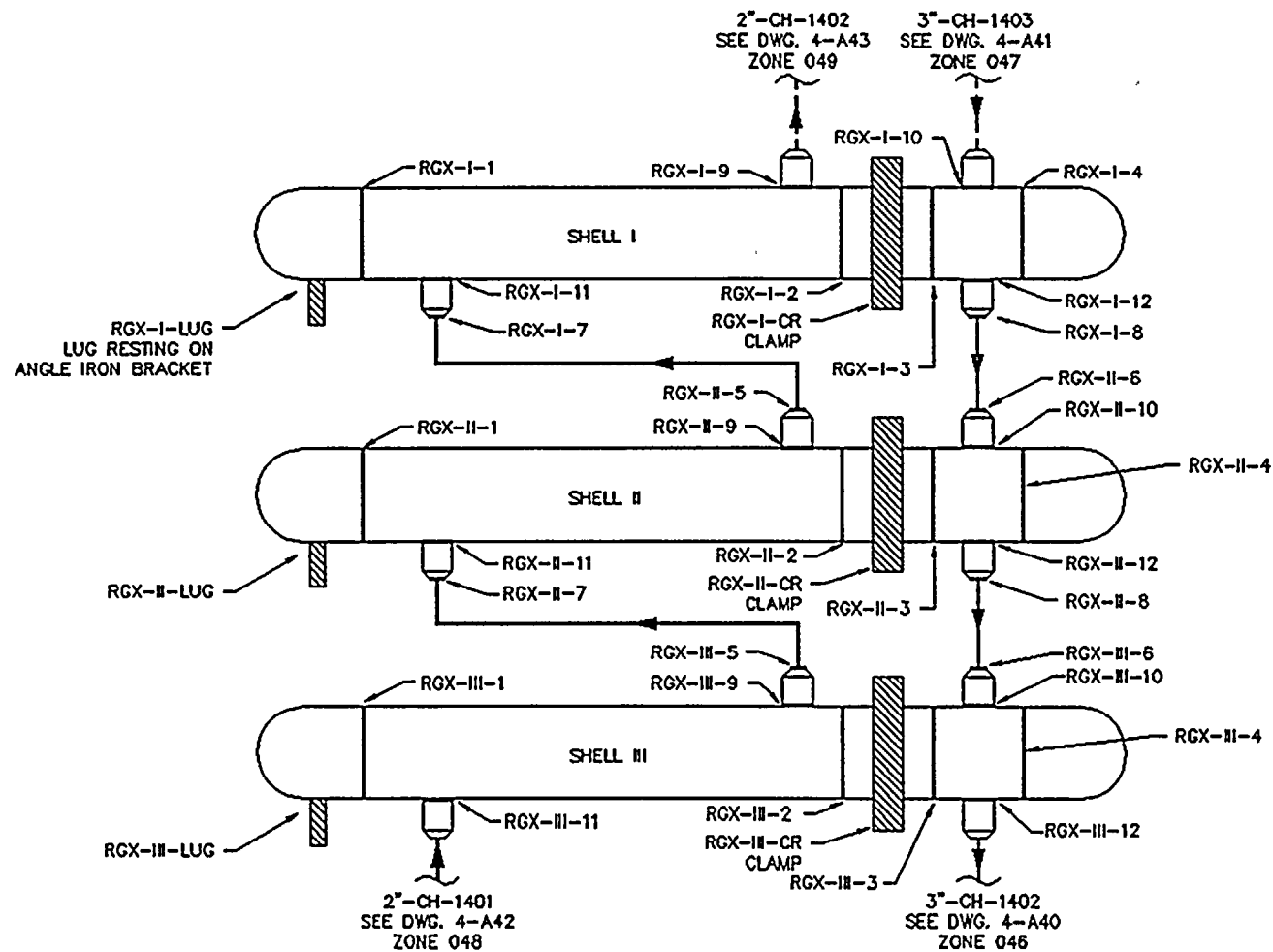
2"-CH-1301


REFERENCE DRAWINGS	NOTES	CAUTION BLOCKS AND MATERIAL	FLORIDA POWER & LIGHT TURKEY POINT UNIT 3		
5613-P-653-S SH. 1 OF 1 5610-T-E-4505 SH. 2 5610-M-410-202 SH. 1 (P&ID) 5610-M-420-3 SH. 3 (P&ID)	STRESS PROBLEM: J-60 LOCATION: CONTAINMENT SYSTEM NO.: 47 LINE IS INSULATED EXCEPT WHERE NOTED WELDS 8 AND 9 IN HIGH RADIATION AREA	2" SCH 160, A376 TP316	TITLE: CHEMICAL AND VOLUME CONTROL FROM REACTOR COOLANT LOOP B COLD LEG		
			DATE: 7/2/92 RLT	ZONE: 048	
			REVIEWED BY: RUSSELL L. TURNER	DRAWING NO.: 3-A47	REVISION: 5

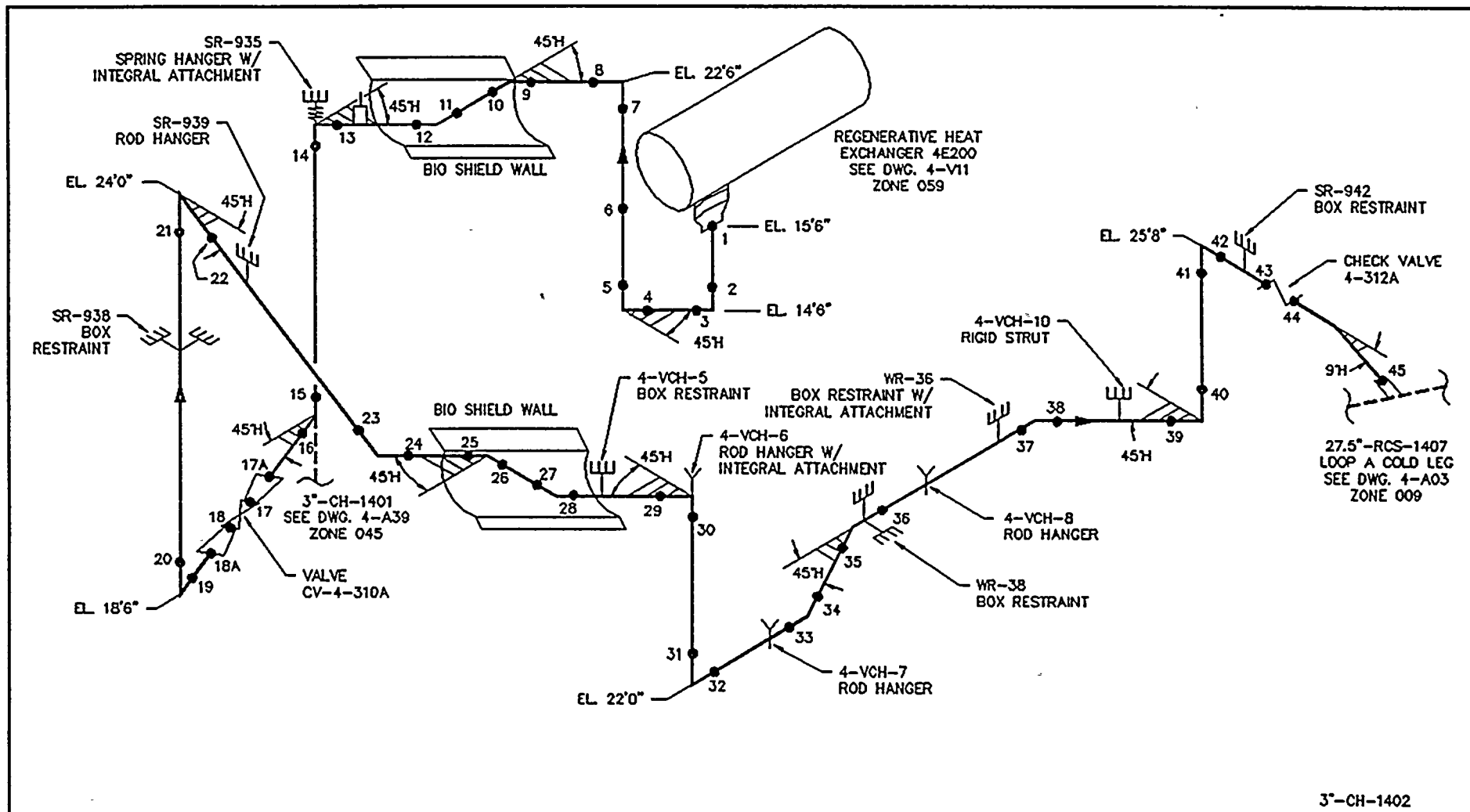



2"-CH-1302

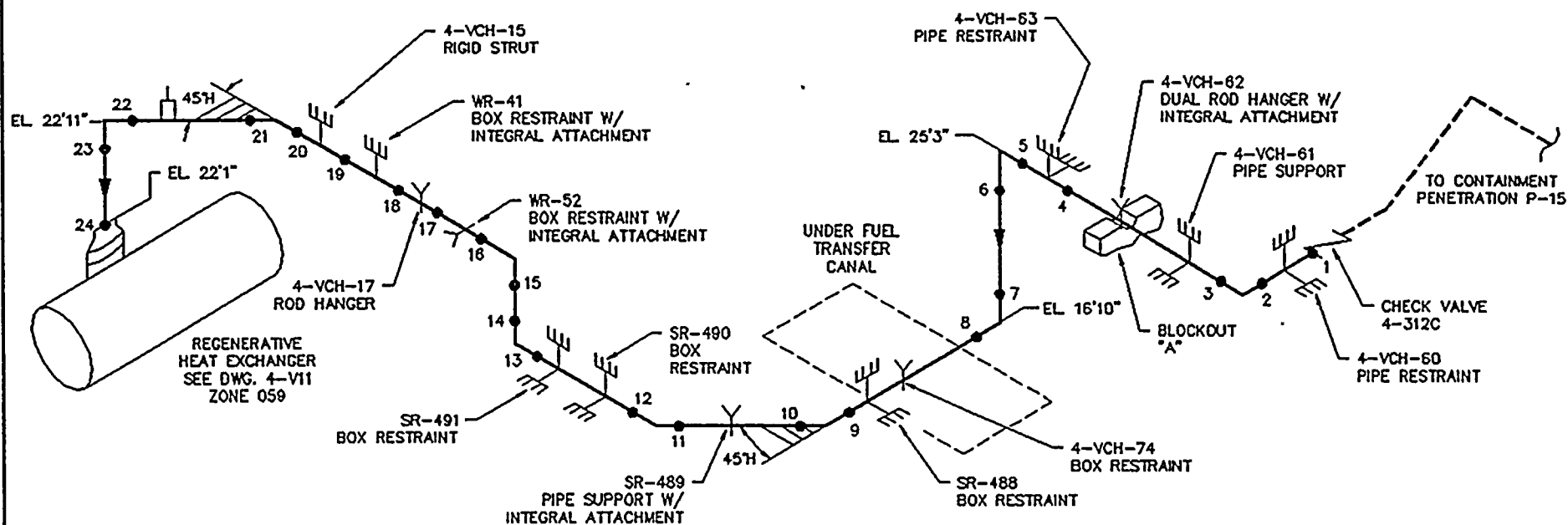
REFERENCE DRAWINGS	NOTES	CALIBRATION BLOCKS AND MATERIAL	 FLORIDA POWER & LIGHT TURKEY POINT UNIT 3		
5813-P-644-S SH. 2 & 3 OF 4 5810-T-E-4505 SH. 2 5810-T-E-4501 SH. 1 5810-M-420-3 SH. 3 (P&ID) 5810-M-410-81 SH. 2 (P&ID)	STRESS PROBLEM: CVCS-11C LOCATION: CONTAINMENT SYSTEM NO.: 47 LINE IS INSULATED	2" SCH 160, A376 TP316 SMLS	TITLE: CHEMICAL AND VOLUME CONTROL FROM THE REGENERATIVE HEAT EXCHANGER		
			DATE: 2/27/92 RLT/PEH	ZONE: 049	
			REVIEWED BY: RUSSELL L. TURNER	DRAWING NO.: 3-A48	REVISION: 6




REFERENCE DRAWINGS	NOTES	CAUBRATION BLOCKS AND MATERIAL	 FLORIDA POWER & LIGHT TURKEY POINT UNIT 4		
SENTRY DWG. A04195-A044 REV. 8 SENTRY DWG. A04195-A01-2 ISSUE 8	LOCATION: CONTAINMENT LOCKED HIGH RADIATION AREA SEE RELIEF REQUEST NO. 3 LINE IS INSULATED	INTERSTAGE PIPING - 3" SCH 80 SHELL - TP304 OR TP316 HEAD - TP304 OR TP316 PIPING - TP304 OR TP316	TITLE: REGENERATIVE HEAT EXCHANGER FPL NO. 4E200		
			DATE: 1/19/93 RLT	ZONE: 059	
			REVIEWED BY: RUSSELL L. TURNER	SKETCH NO.: 4-V11	REVISION: 6



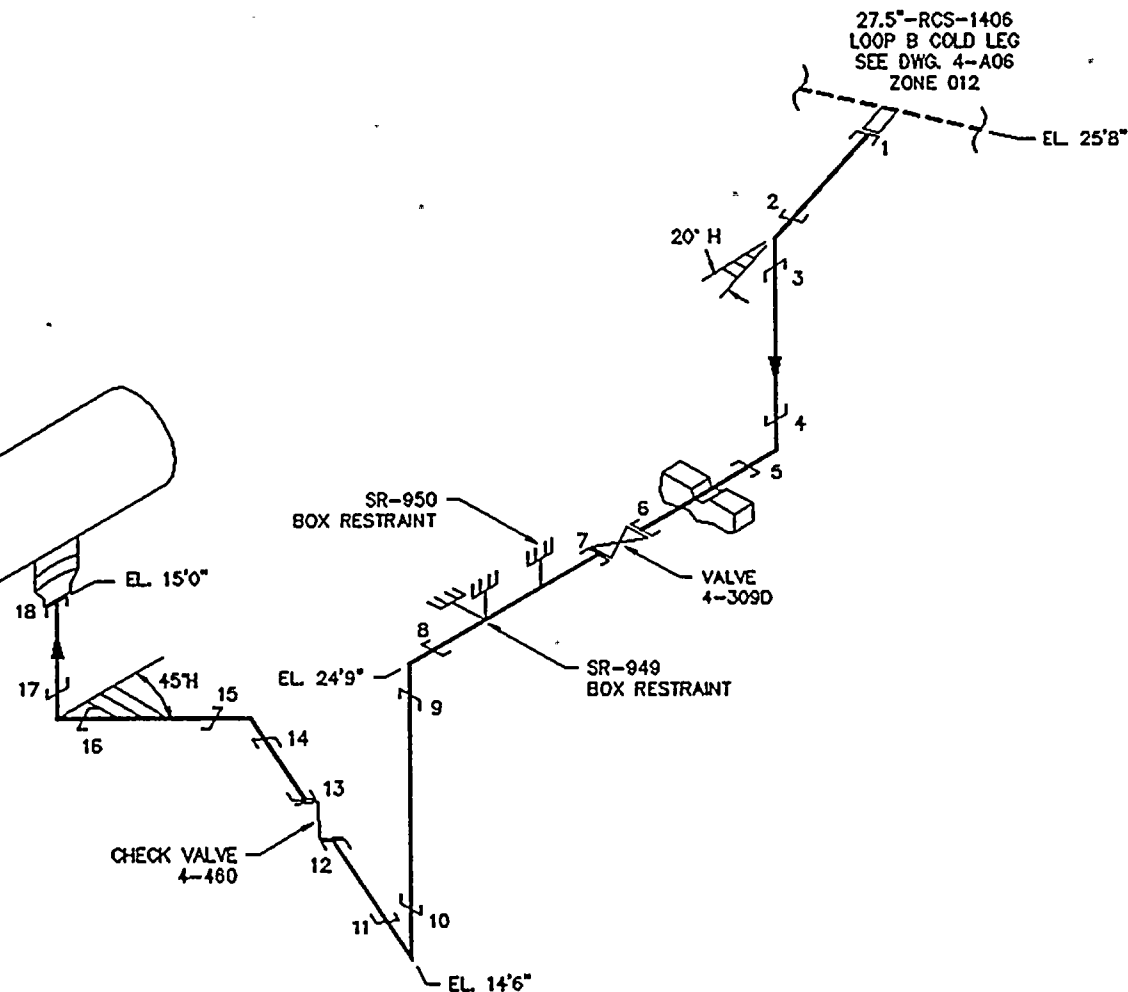
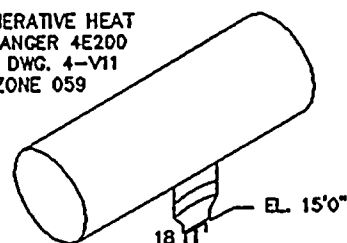
REFERENCE DRAWINGS	NOTES	CALIBRATION BLOCKS AND MATERIAL	<div>  <div>FLORIDA POWER & LIGHT TURKEY POINT UNIT 4</div> </div>		
5614-P-782-S SH. 2 & 3 OF 3 5610-T-E-4501 SH. 1 5610-T-E-4505 SH. 1 5610-M-410-91 SH. 3 (P&ID) 5610-M-420-3 SH. 3 (P&ID) 5610-M-420-214 (P&ID)	STRESS PROBLEM: 023 LOCATION: CONTAINMENT BY LOOP A COLD LEG SYSTEM NO.: 47 LINE IS INSULATED	3" SCH 160, A376 TP 316 SMLS	TITLE: CHEMICAL AND VOLUME CONTROL TO REACTOR COOLANT LOOP A COLD LEG		
			DATE: 1/14/93 RLT	ZONE: 048	
			REVIEWED BY: RUSSELL L. TURNER	SKETCH NO.: 4-A40	REVISION: 8



3"-CH-1403

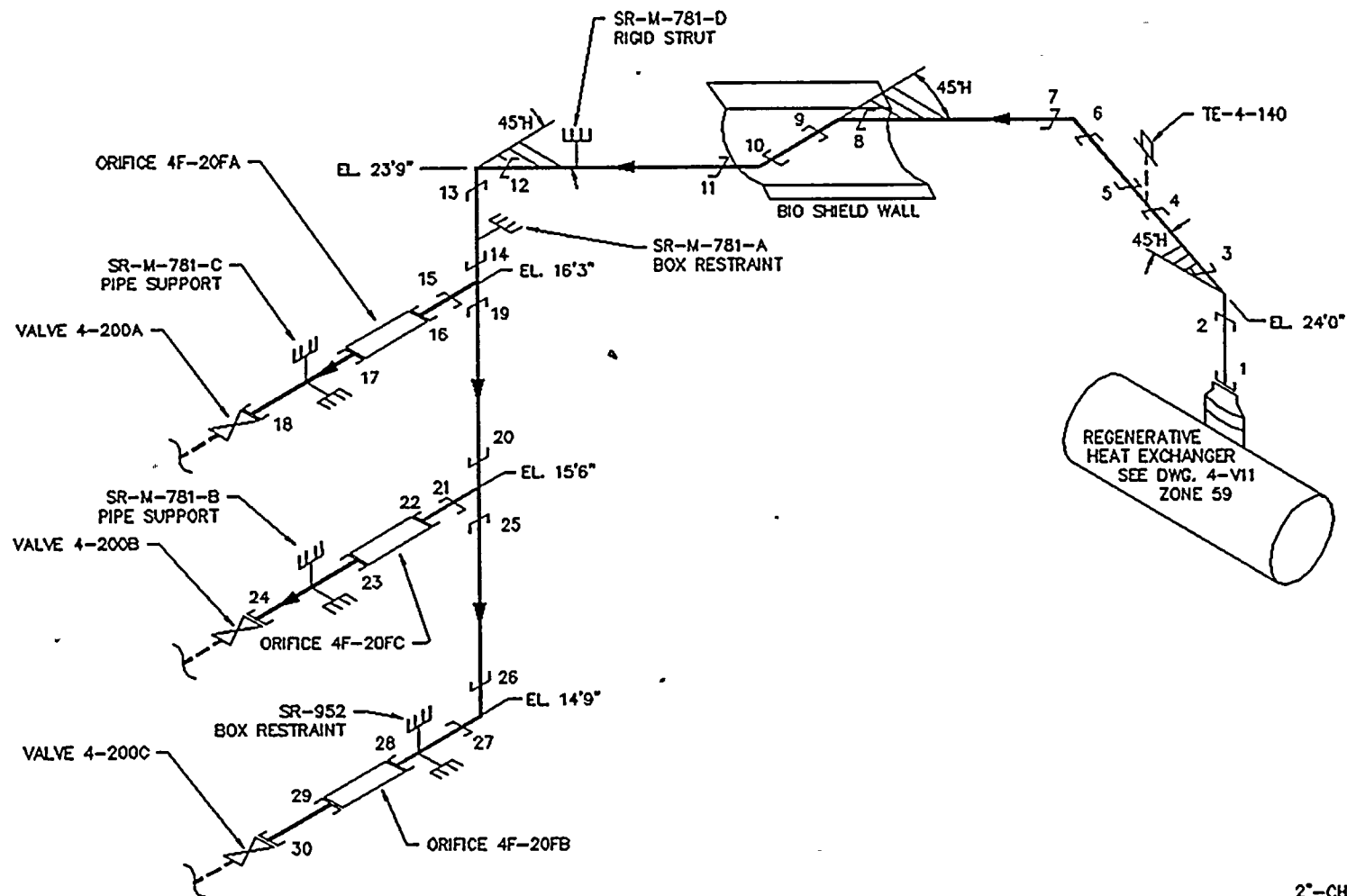
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5814-P-551-S SH. 1 OF 1 5810-T-E-4505 SH. 1 5810-M-420-3 SH. 3 (P&ID)	STRESS PROBLEM: CVCS-24 LOCATION: CONTAINMENT SYSTEM NO.: 47 LINE IS INSULATED	3" SCH 160, A376 TP316 SMLS	TITLE: CHEMICAL AND VOLUME CONTROL TO REGENERATIVE HEAT EXCHANGER		
			DATE: 2/24/92 RLT/SJC	ZONE: 047	
			REVIEWED BY: RUSSELL L. TURNER	DRAWING NO.: 4-A41	REVISION: 6

REGENERATIVE HEAT
EXCHANGER 4E200
SEE DWG. 4-V11
ZONE 059




2"-CH-1401

REFERENCE DRAWINGS	NOTES	CALIBRATION BLOCKS AND MATERIAL	FLORIDA POWER & LIGHT TURKEY POINT UNIT 4		
5814-P-550-S SH. 1 OF 1 5810-T-E-4501 SH. 1 5810-T-E-4505 SH. 2 5810-M-410-91 SH. 2 (PI&D) 5810-M-420-3 SH. 3 (PI&D)	STRESS PROBLEM: CVCS-23 LOCATION: INSIDE CONTAINMENT SYSTEM NO.: 47 LINE IS INSULATED ALL PIPING IS SOCKET WELDED	2" SCH 160, A376 TP316 SMLS	TITLE: CHEMICAL AND VOLUME CONTROL FROM REACTOR COOLANT LOOP B COLD LEG		
			DATE: 2/26/92 RLT/SJC	ZONE: 048	
			REVIEWED BY: RUSSELL L. TURNER	DRAWING NO.: 4-A42	REVISION: 8



2"-CH-1402

REFERENCE DRAWINGS	NOTES	CALIBRATION BLOCKS AND MATERIAL	 FLORIDA POWER & LIGHT TURKEY POINT UNIT 4		
5614-P-553-S SH. 3 OF 4 5610-M-420-214 SH. 3 OF 3 5610-T-E-4503 SH. 1 OF 3	STRESS PROBLEM: CVCS-25C LOCATION: CONTAINMENT SYSTEM NO.: 47 LINE IS INSULATED	2" SCH 160, A376 TP316 SMLS	TITLE: CHEMICAL AND VOLUME CONTROL FROM THE REGENERATIVE HEAT EXCHANGER		
			DATE: 1/14/93 RLT		ZONE: 049
			REVIEWED BY: RUSSELL L. TURNER	SKETCH NO.: 4-A43	REVISION: 6

