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SUBJECT: Forwards "Third Ten Year Inservice Insp Program for Turkey Point Nuclear Power Plant Units 3 & 4."

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SEP 09 1993

L-93-220
10 CFR 50.55a

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

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Inservice Inspection
Third 10-Year Summary Program

The third ten year in-service inspection interval for Turkey Point Unit 3 begins on February 23, 1994, and ends on February 22, 2004. For Unit 4 it begins April 15, 1994, and ends April 14, 2004. Pursuant to 10 CFR 50.55a(g)(4)(ii), the enclosed program outlines the ISI program and schedule for Turkey Point Units 3 and 4 based on the requirements of Section XI of the ASME Boiler and Pressure Vessel Code (ASME Code), 1989 Edition.

Piping and Instrumentation Diagrams are available in the latest revision of the FSAR.

Please contact us if there are any questions about this submittal.

Very truly yours,

T. F. Plunkett
Vice President
Turkey Point Nuclear

TFP/SAV/vmg

Attachment

cc: Stewart D. Ebneter, Regional Administrator, Region II, USNRC
T. P. Johnson, Senior Resident Inspector, USNRC, Turkey Point Plant

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TURKEY POINT UNITS 3 AND 4
Third 10 YEAR IN-SERVICE INSPECTION PROGRAM

Executive Summary

10 CFR 50.55a requires Owners of Nuclear Power Plants to update the In-Service Inspection (ISI)Program every 10 years. The ASME Section XI Code that is referenced in the CFR one year before the submittal date will be the Code of record (1989 Edition).

The ISI Program details how FPL will implement those requirements at Turkey Point during the Third 10 Year Interval. The Program closely follows ASME Section XI. As allowed by the CFR, alternative methods of implementing Section XI have been incorporated. Examples of alternatives include deviating from the required percentages of examinations to be completed during an inspection period (the Interval is broken into 3 year, 4 year, 3 year periods), and clarifying how FPL will implement additional examinations.

Several Code Cases have been included to alter the ISI requirements. These have been approved and are allowed by USNRC Regulatory Guide 1.147. The following Code Cases will be implemented:

N-307-1 - Revised UT exams for B-G-1 (allows the use of alternative exam methods and coverage for RPV Closure Head Bolting)

N-355 - Calibration Blocks for Angle Beam UT of Large Fittings (allows FPL to use existing calibration blocks for large fittings instead of fabricating new ones)

N-416 - Alternative Rules for Hydrostatic Testing of Repair or Replacement of Class 2 Piping (allows deferral of Hydrostatic tests until the end of the Interval instead of immediately after the repair or replacement)

N-460 - Alternative Examination Coverage for Class 1 and 2 Welds (lowers the requirement from 100% coverage to 90%)

N-461 - Alternate Rules for Piping Calibration Block Thickness (allows the use of existing Calibration Blocks for many welds not covered by N-355)

N-481 - Alternate Examination Coverage for Cast Austenitic Pump Casings (allows a visual examination of welds instead of ultrasonic or radiography, Code case has been altered to conform with Code Case N-498)

N-489 - Alternate Rules for Level III NDE Qualification Examinations (clarifies Level III NDE Qualifications)

N-498 - Alternate Rules for 10 Year Hydrostatic Pressure Testing for Class 1 and 2 Systems (changes hydrostatic testing to system pressure test)

Relief Requests have been written to cover areas where it has been found to be impractical to meet the Code requirements, Appendix G.

Relief #1 - Incomplete coverage of RPV welds. State of the art examination techniques do not cover the required areas. Requesting relief from code requirements.

Relief #2 - Incomplete coverage of RPV safe-end welds. State of the art examination techniques do not cover the required areas. Requesting relief from code requirements.

Relief #3 - Relief from exams on the Regenerative Heat Exchanger. High radiation in the area makes these exams impractical to perform.

Relief #4 - Relief from performing snubber examinations per OM-4. FPL has an effective program in place per Plant technical specifications. Requesting to continue this program.

Relief #5 - Relief from examination of RPV welds. Requesting to defer nozzle examinations from the 1st period to the 3rd in order to combine all exams into one outage. Will save 5 days critical path time during one outage and save approximately 2 million ISI dollars.

Relief #6 - Alternate NIS-1 and NIS-2 forms. Reduces requirement to submit forms each outage to once each period, and alters forms to meet future requirements (lowers the amount of information reported to the USNRC)

Relief #7 - Alternate examinations of longitudinal seam welds on piping. Reduces the amount of coverage required on long seams. There have been no in-service failures of long seams in the industry.

Relief #8 - Alternative Rules of selection and examination of Class 1, 2 and 3 Integrally welded attachments. Lowers the amount of attachments examined by approximately 70%. This closely follows Code Case N-509, which is being considered for approval by USNRC.

Relief #9 - Alternative scheduling of Examinations. Code requires that the schedule established during the 1st interval be used as a guide for the schedule for the 3rd. Many areas now examined were not performed during the 1st interval. Rule changes have added and deleted many areas. In order to reduce costs and radiation exposure, the schedule of examinations was optimized.

Relief # 10 - Alternative examination of bolted connections on borated piping subject to VT-2 requirements. Code requires removal of insulation. FPL is requesting relief from this requirement and proposes to perform alternative examinations.

All Relief Requests have been incorporated into the Database and this program with the assumption they will be granted.