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SUBJECT: Forwards response to 930624 RAI to support technical review of util 10CFR50.59 evaluation of RHR check valve flaw.

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

Gentlemen:

Re: Turkey Point Unit 3
Docket No. 50-250
Request for Additional Information - 10 CFR 50.59 Evaluation
Residual Heat Removal Check Valve Flaw

By letter dated June 24, 1993, the NRC requested additional information to support the technical review of the above referenced 10 CFR 50.59 evaluation. The response to the NRC questions is enclosed.

Should there be any questions, please contact us.

Very truly yours,

T. F. Plunkett
Vice President
Turkey Point Nuclear

Enclosure

TFP/RJT/rt

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

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FLORIDA POWER AND LIGHT COMPANY

TURKEY POINT UNIT 3

RESPONSE TO THE REQUEST FOR ADDITIONAL INFORMATION

10 CFR 50.59 EVALUATION -
RESIDUAL HEAT REMOVAL CHECK VALVE FLAW

RESPONSE TO NRC QUESTIONS

By letter dated June 24, 1993, the NRC requested additional information to support the technical review of Florida Power and Light Company's (FPL) 10 CFR 50.59 Evaluation of the Turkey Point Unit 3 Residual Heat Removal Check Valve Flaw. The response to the NRC questions is enclosed.

Question:

You evaluated a flaw in the Turkey Point Unit 3 residual heat removal (RHR) system "A" pump discharge check valve 3-753A and documented the evaluation in JPNS-PTN-92-0246, "Turkey Point Unit 3 10CFR50.59 Safety Evaluation for Acceptability of As-Found Condition for RHR valve 3-753A" Revision 4 dated March 3, 1992. You concluded that the estimated flaw growth is small and therefore, the valve is acceptable in its as-found condition until the end-of-service life of the plant.

Your analytical evaluation followed the methodology and met the criteria in IWB-3600 in the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code Section XI.

ASME Code Section XI, IWB-3122.4, "Acceptance by Evaluation" indicates that components acceptable to the criteria of IWB-3600 shall be subsequently re-examined in accordance with IWB 2420(b) and (c). In lieu of this ASME Code re-examination criteria, on June 16, 1993, in a telephone conversation relating to this subject matter, your staff indicated that the flaw in the subject check valve would be examined in a 5-year interval throughout the life of the plant. Please provide the basis for performing re-examination at intervals different from ASME Code Section XI requirements.

Response:

The applicability of the Code analysis and reinspection requirements are as follows:

- Section XI IWC-2500-1 Examination Category C-G does not provide examination requirements for Class 2 (non-welded) valve interior surfaces.
- Section XI IWC-3000 Acceptance Standards do not include criteria for comparison of flaws identified on interior surfaces of class 2 valves.
- Typical valve original construction codes such as ASME III and ANSI B 16.5 do not address fatigue evaluation techniques.

Because the flaw is outside the scope of components that require full Section XI analysis and reinspection requirements, and based on the lack of construction code analysis guidance, the use of the analytical technique contained in IWB-3600 for fatigue growth is considered a reasonable approach. Based on no required Code inservice program commitment for flaw evaluation in this case, Code reinspection intervals were not specifically mandated. However, FPL initiated a 5 year routine preventative maintenance re-inspection frequency.

In cases where Section XI re-inspection requirements are applicable, IWC-2420 (b) requires the areas containing such flaw indications to be subsequently re-examined in accordance with IWC-2412 during the next inspection period. Although not specifically designed to provide consistency with Section XI re-inspection intervals, the first re-inspection is scheduled for the first available opportunity after January 1996 and every 60 months thereafter. If the re-inspection requirements of IWC-2420 were to be considered, for a flaw discovered during the second inspection interval (1984 to 1994), third period (1991 to 1994), the next reexamination per IWC-2412 would be in the third inspection interval (1994 to 2004), first period (1994 to 1997). As such, the presently scheduled 1996 re-inspection meets the intent of Section XI code re-inspection requirements.

FPL concluded that the flaw growth is small for 40 years of service, which effectively extends the acceptable period of the valve to the end-of-service life of the plant. The present preventative maintenance re-inspection schedule of 60 months, adequately ensures that flaw propagation will be properly monitored.