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SUBJECT: Provides revised relief request number 10 for ISI program  
 for third ten yr summary.

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L-95-076  
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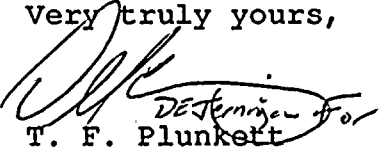
Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Inservice Inspection Program  
Third Ten Year Summary  
Revised Relief Request No.10

By letter L-93-220, dated September 9, 1993, Florida Power and Light Co. (FPL) submitted a summary of the Inservice Inspection (ISI) Program and relief requests for the third ten year interval at Turkey Point Units 3 and 4. The ISI Program details how FPL will implement Inservice Inspection requirements at Turkey Point during the third ten year interval. By letter L-94-118, dated May 31, 1994, FPL provided additional information regarding the ISI Program, as requested by NRC letter dated April 4, 1994.

As a result of questions raised during NRC's review of Relief Request No. 10, and as discussed during several telephone conversations with the NRC, attached is the revised Relief Request No. 10, Class 1 and 2 Borated Bolted Connections Subject to VT-2 Examination.

Should there be any questions concerning this submittal, please contact us.

Very truly yours,

  
T. F. Plunkett  
Vice President  
Turkey Point Plant

OIH

Attachment

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

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ATTACHMENT TO L-95-076

REVISED RELIEF REQUEST NO. 10

Turkey Point ISI Program  
Revised Relief Request No. 10

A. Component Identification:

Turkey Point Unit 3  
Turkey Point Unit 4

Class 1 and 2 Borated Bolted Connections Subject to VT-2  
Examination

B. Examination Requirements:

Rules for Inservice Inspection of Nuclear Power Plant  
Components, 1989 Edition

IWA-5242 Insulated Components

- (a) For systems borated for the purpose of controlling reactivity, insulation shall be removed from pressure retaining bolted connections for visual examination VT-2.

C. Relief Requested:

Florida Power and Light Company (FPL) requests interim relief from removing the insulation from all pressure retaining borated bolted connections located on borated water systems during VT-2 examinations for the upcoming Turkey Point Units 3 and 4 refueling outages, currently scheduled for September 1995, and March 1996, respectively.

D. Basis for Relief:

For systems borated for the purpose of controlling reactivity, removal of insulation from bolted connections for the purpose of performing a visual examination for corrosion will involve a significant increase in man hours, radiation exposure, and material.

The quantity of bolted connections which will require insulation removal and restoration, as determined by an initial review of drawings and other design documents, involves a significant increase in the amount of man hours and material. This hardship in turn, results in escalated operations maintenance costs, and radiation exposure, without a compensating increase in the level of quality and safety.

In an effort to minimize the impact of these examinations in the future, FPL will evaluate the feasibility and cost benefit of an insulation modification at applicable locations, such that an examination may be performed without the need to remove insulation each time. The evaluation of the feasibility of this modification, however, cannot be completed

Turkey Point ISI Program  
Revised Relief Request No. 10

until a walkdown of the piping is performed. This walkdown cannot be performed at power.

This interim relief will provide time to resolve the scope of these examinations through the ASME Code process and evaluate the results of system walkdowns conducted inside containment to determine the feasibility of permanent design changes.

E. Alternative Examinations

FPL will check bolted connections for leakage when performing system examinations as follows:

As soon as possible, after coming off line for a refueling outage, a leak test is coordinated by the system engineers inside the containment per the plant surveillance program.

During the outage, suitcase style insulation will be removed from the Reactor Coolant and Charging systems inside containment, and the connections visually examined (VT-2) for evidence of leakage when the plant is depressurized. When evidence of leakage is identified, repairs will be performed in accordance with the current maintenance work practices.

During the outage, any Class 1 or Class 2 insulated connections in the Reactor Coolant and Charging systems inside containment that are disassembled will be examined for evidence of leakage by maintenance personnel. When evidence of leakage is identified, repairs will be performed in accordance with the current maintenance work practices.

Prior to reactor criticality, following a refueling outage, a system leakage test is performed at normal operating pressure and temperature with a 4 hour hold time.

These leakage tests will include looking for the following conditions:

Pooling of water directly under the bolted connections;

Water leaking from the lowest elevation section of vertical lines containing bolted connections; and

Discoloration or residue on surfaces examined shall be given particular attention to detect evidence of boric acid accumulations from borated reactor coolant leakage.

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F. Implementation Schedule

The upcoming Unit 3 refueling outage, currently scheduled for September 1995, and the upcoming Unit 4 refueling outage, currently scheduled for March 1996.

G. Attachments

None





10/1/74