

# PRIORITY 1

(ACCELERATED RIDS PROCESSING)

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OCT 26 1995  
L-95-277  
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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 Testing Program

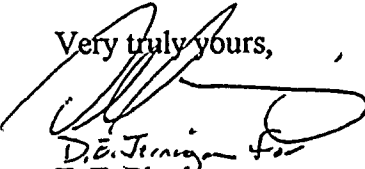
By letter L-94-001, dated January 12, 1994, Florida Power and Light Company (FPL) submitted revision 0 of the Third Ten Year Inservice Testing (IST) Program for Turkey Point Units 3 and 4. By letter dated October 27, 1994, the NRC provided the Safety Evaluation (SE) related to the IST Program.

Attachment 1 provides the response to the Recommended Action Items identified in Section 5 of the Technical Evaluation Report (TER) issued as part of the NRC SE.

Attachment 2 is revision 1 of the Third Ten Year IST Program for Turkey Point Units 3 and 4. The IST Program changes from the initial revision 0 version are identified by a revision bar on the right hand margin of the page. Attachment 3 is a status of the relief requests associated with the IST Program. The IST Program incorporates six relief requests, of which five are reliefs from pump testing requirements, and one is a relief from valve testing requirements. Of the six active relief requests, five have been granted on a permanent basis, and one has been granted with provisions. Relief Request PR-2 was revised to indicate that pump vibration is being measured quarterly. Relief Request PR-4, which was approved with provisions, has been revised to provide clarification on the pump differential pressure calculations, per Recommended Action Item 5.2 of the TER, and to specify to which pumps it applies. Relief Request PR-4 is resubmitted for NRC review and approval. Relief Request PR-5, although previously approved, has been revised to address the frequency response of a new vibration measuring device. Relief Request PR-5 is resubmitted for NRC review and approval. The revised sections of the relief requests are identified within each affected request. NRC approval of Relief Requests PR-4 and PR-5 is requested by May 1, 1996. FPL will continue to comply with revision 0 of the IST Program until NRC approval of revision 1 to Relief Requests PR-4 and PR-5 is received.

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

Very truly yours,

  
T. F. Plunkett  
Vice President  
Turkey Point Plant

OIH

Attachments

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

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**ATTACHMENT 1**  
**IST PROGRAM NRC RECOMMENDED ACTION ITEMS**

**RECOMMENDED ACTION ITEMS SECTION 5.1**

The IST Program's scope was reviewed for selected systems. The pumps and valves in the Component Cooling Water, Residual Heat Removal, and Safety Injection Systems were reviewed against the requirements of Section XI and the regulations. The review results showed compliance with the Code, except for the items below. The licensee should review these items and make changes to the IST Program, where appropriate. Additionally, the licensee should verify that there are not similar problems with the IST Program for other systems.

**FPL RESPONSE**

As part of the response to the specific questions provided in the Technical Evaluation Report, Turkey Point took the following additional actions to ensure that the comments are addressed generically:

- The basis for exclusion of all Quality Group A, B, and C relief valves was reviewed. As a result of this review, two additional valves within the CVCS system [RV-3(4)-0382] are being added to the IST Program and two relief valves [RV-4-1451A & B] on the Unit 4 emergency diesel generator cooling water expansion tanks are being deleted from the IST Program due to their design and Quality Group classification.
- The responses to Unit specific questions were reviewed and found to be valid for the other Unit.

**RECOMMENDED ACTION ITEMS SECTION 5.1.A - GENERAL**

Several relief valves are not in the IST Program. For example, on P&ID 5613-M-3030-2, RV-3-747A & B, the relief valves on the bypass lines around the normally closed CCW outlet isolation valves MOV-3-749 A & B from the RHR Heat Exchangers, are not in the Program. Also other relief valves on this drawing are not in the Program.

The Code requires testing of all relief valves installed in systems that perform a function to achieve or maintain safe shutdown conditions or in mitigating an accident. An inquiry has been submitted to the ASME to clarify the Code requirements concerning thermal relief valves which are only required to function when components, e.g., heat exchangers are isolated. The licensee should review the basis for excluding those relief valves from the IST Program and ensure that the basis agrees with the Code interpretation when published.



### **FPL RESPONSE**

RV-3-747A & B open to protect the associated Residual Heat Removal (RHR) heat exchanger from damage should the component be isolated and subjected to internal heating and expansion of the contained fluid. The only scenario for which this could occur is when the shell side of the heat exchanger is isolated for maintenance, for which the heat exchanger would be declared out of service and isolated from the remainder of the system. Failure of the heat exchanger and associated piping or the relief valve in this scenario would not impact the ability of the system to perform its design function.

In March 1995, the Code Subcommittee on Valves approved the inquiry regarding testing of thermal relief valves, stating that thermal relief valves require testing under the ASME OM Code "provided they fall within the scope of ISTC 1.1 as determined by the Owner." Since the scope of applicability for the ISTC 1.1 is the same as the scope specified in OMa Part 10, 1988, the above basis for exclusion still remains valid.

### **RECOMMENDED ACTION ITEMS SECTION 5.1.B - COMPONENT COOLING WATER SYSTEM**

#### **ITEM 1**

The licensee should verify that there are no Category A isolation valves for the component cooling water (CCW) system, as none are listed in the Program.

### **FPL RESPONSE**

At Turkey Point, the CCW system is a closed system inside containment and is designed as a seismic Class I system that is capable of withstanding the effects of increased pressure and temperature inside containment following an accident. For closed systems inside containment, the closed piping loop provides the first barrier to containment leakage into the piping and therefore is mechanically comparable to an extension of the containment liner plate. Based on the design requirements of this system, there is no credible failure that will cause the permanent, passive boundary of the system to be breached. Additionally, the system is maintained pressurized during normal operation and any system leakage would be quickly identified through changes in the CCW surge tank level. Based on the preceding, leakage testing of single isolation valves used in conjunction with closed systems such as the CCW system is not required, and therefore none of the valves are required to be classified or tested as Category A valves within the IST Program.



ITEM 2

Control valve RCV-3-609 (P&ID 5613-M-3030-1 @ C7), on 4"-AC-153R, the CCW Surge Tank outlet line to the Waste Disposal System, appears to be normally or intermittently open, and is designated to fail closed, is not in the program. The licensee should review the function of this valve and revise the Program as necessary.

**FPL RESPONSE**

RCV-3-609 is located on the CCW system which, as discussed in the previous response, is a closed system inside containment for which there is no credible failure that will cause the permanent, passive boundary to be breached. This system design precludes the necessity for this valve to close to mitigate the consequences of an accident. Additionally, the valve performs no functions in regards to shutting down the reactor or maintaining cold shutdown conditions. Based on the preceding, the function of RCV-3-609, including failure position upon loss of valve actuator power, was determined not to fall within the scope of the program as defined in OM Part 10.

ITEM 3

Control valve TCV-3-144 (P&ID 5613-M-3030-2 @ D5) is not in the Program. The P&ID indicates that it is actually Out of Service but is required to Fail Open.

**FPL RESPONSE**

TCV-3-144 does not perform a function with respect to accident mitigation or achieving and maintaining cold shutdown conditions and therefore, has been determined not to fall under the scope of OM Part 10. This basis is further substantiated by the fact that CCW flow through the nonregenerative heat exchanger is set by throttling the manual bypass valve around TCV-3-144 and CCW flow is unaffected by the position of TCV-3-144 since the manual inlet valve to this control valve is maintained closed.

ITEM 4

Six inch check valve 3-0717, (P&ID 5613-M-3030-5 @ E3) normally open, and appears to have a safety related function to close as a Containment Isolation Valve for P-03 to isolate CCW flow to the Reactor Coolant Pumps, is not in the Program. The licensee should review the function of this valve and revise the Program as necessary.





## **FPL RESPONSE**

The safety related function of isolation of CCW flow to the Reactor Coolant Pumps is performed by MOV-3-716B, which is included and tested as a Category B, active valve within the current IST Program. Containment isolation for this penetration is provided as previously discussed, by the closed system inside containment.

## **RECOMMENDED ACTION ITEMS SECTION 5.1.C - RESIDUAL HEAT REMOVAL SYSTEM**

Air-operated, fail open butterfly valve, HCV-3-0758 (P&ID 5613-M-3050-1 @ C5) from the RHR heat exchanger to the normal RHR/low head injection to the RCS cold legs is not in the program. The licensee should review the function of this valve and revise the Program as necessary.

## **FPL RESPONSE**

HCV-3-0758 is normally open during Modes 1, 2 and 3 with the non-safety related instrument air isolated and the valve physically verified to be failed open against its mechanical stop. During a design basis accident the valve is not utilized to throttle flow to the reactor coolant system. In Mode 4 and below, instrument air is unisolated and HCV-3-0758 is utilized to control RCS temperature. This temperature control function during cooldown is categorized as a non-safety related function within the design basis documents and the categorization of this function is further substantiated by its use of a non-safety related air supply. Based on the preceding, the valve is categorized as B, Passive, with no exercise test required. However, based on the necessity for the valve to be failed open against its backstop, it has been determined that failsafe testing should be performed in accordance with the IST Program. This requirement has been included in revision 1 of the IST Program.

## **RECOMMENDED ACTION ITEMS SECTION 5.1.D - SAFETY INJECTION SYSTEM**

### **ITEM 1**

On page 84 of the valve table (for Unit 3), check valve 3-0875C, has been designated Category C but because it is a pressure isolation valve it should be designated A/C. (See also Table 3.4-1 of Technical Specifications).

## **FPL RESPONSE**

The IST Program (Rev. 1) has been revised to reflect this designation.



ITEM 2

The licensee should verify why check valves, 3-0875D, 3-0875E, and 3-0875F (P&ID 5613-M-3064-1), have not been classified as pressure isolation valves while the other branching check valves have been so classified.

**FPL RESPONSE**

At Turkey Point, only the "Event V" pressure isolation valves are specifically called out in Technical Specifications with specific leakage limits assigned. Check valves 3-0875D, 3-0875E, and 3-0875F are not listed in the Technical Specification and as such have no specific leakage limit assigned. The IST Program categorizes these valves as Category C and as recommended in Generic Letter 89-04, Position 4, periodic closure testing of these valves is performed on a refueling frequency basis.

**RECOMMENDED ACTION ITEMS SECTION 5.2**

In Pump Relief Request PR-4 for all pumps in the IST Program, the licensee should ensure that the calculation of pump differential pressure is proceduralized properly to account for liquid in the pressure sensing gage lines so that the accuracy of the final value meets Code requirements.

**FPL RESPONSE**

The Code requirement for pressure measurement states that if the presence or absence of liquid in a gage line could produce a difference of more than 0.25% in the indicated value of the measured pressure, means shall be provided to assure or determine the presence or absence of liquid as required for the static correction used. For gauges which were not vented and did not meet the above Code requirement, the introduced error in conjunction with the specific range and accuracy of the gauges utilized were verified to exceed the Code required accuracy for calculation of differential pressure. This calculation verified that the square root of the sum of the squares (SRSS) of the errors of the gauges utilized, including a term to account for the error associated with the presence or absence of liquid, was less than the SRSS of six percent of the associated suction and discharge pressures. The relief request has been clarified to state this fact and more specifically delineate to which pumps it applies.

**RECOMMENDED ACTION ITEMS SECTION 5.3**

In any future revision of Pump Relief Request PR-2 for the Residual Heat Removal Pumps, the licensee should also indicate that vibration is being measured quarterly.



## **FPL RESPONSE**

Pump Relief Request PR-2 included in the IST Program (Rev. 1) has been updated as requested.

### **RECOMMENDED ACTION ITEMS SECTION 5.4 (1)**

In Valve Relief Request VR-2 for check valves in the Safety Injection System which are pressure isolation valves (PIVs), in which the licensee wants to perform a seat leakage test verification of valve closure in accordance with the frequencies specified in Technical Specification 4.4.6.2.2, the licensee could convert this request into a deferral justification and include valves:

- 3-0873C and 4-0873C
- 3-0875A thru C and 4-0875A thru C

## **FPL RESPONSE**

Valve Relief Request VR-2 has been withdrawn in revision 1 of the IST Program with the request converted into a refueling outage justification in accordance with the guidelines provided in Section 4.1.4 of NUREG 1482. Valves 3/4-0873C has been included in this refueling outage justification. A deferral already exists for 3/4-0875A thru C (CSJ-SI-7).

### **RECOMMENDED ACTION ITEMS SECTION 5.4 (2)**

The licensee should also verify whether:

- Cold Leg Injection check valves 3-0876A thru C should be included in the request.

## **FPL RESPONSE**

Valves 3/4-0876A, B, and C are not required to be added to this new justification as closure testing of these valves is already covered under cold shutdown justifications CSJ-SI-5 and CSJ-SI-6.

**RECOMMENDED ACTION ITEMS SECTION 5.4 (3)**

The licensee should also verify whether:

- Valves 3-0876 D&E and 4-0876 D&E on the Alternate Low Head Safety Injection lines from the Residual Heat Removal (RHR) heat exchangers perform a safety function in the open position and whether an exercise closed test is also required. The licensee should also review whether these valves are active, rather than passive.

**FPL RESPONSE**

Review of the Turkey Point UFSAR Chapter 6 and the design basis document indicate that the residual heat removal system was designed to perform its function following a single active failure under General Design Criterion 41. The capability of the system to operate following selected passive failures was imposed by the Atomic Energy Commission after a staff meeting in 1967. This capability, although available, is beyond the original design of the system. Based on the preceding it has been determined that these valves do not perform a safety function in the open direction. In regards to their classification as active or passive, these valves were initially classified as passive as they are normally closed, periodically verified closed by seat leakage testing and required to be retested following opening under the requirements of Technical Specification 4.4.6.2.2. However, in order to provide consistency in the Program, this classification will be revised to active and an exercise closure test specified. Current testing of these valves will be unaffected by this change as a refueling outage justification will also be added specifying that testing will conform to the requirements of plant Technical Specifications.

**RECOMMENDED ACTION ITEMS SECTION 5.4 (4)**

The licensee should also verify whether:

- The pressure differential requirements of OM-10, paragraph 4.2.2.3 for seat leakage testing are met by the Technical Specification required testing for PIVs. If the licensee determines that the proposed leak rate testing in the Technical Specifications is not adequate to meet the Code requirements for leak rate testing (i.e. OM-10 paragraph 4.2.2.3), a relief request should be prepared and submitted for review.

**FPL RESPONSE**

Testing requirements implemented for the pressure isolation valves has been verified to meet the requirements of OM-10, paragraph 4.2.2.3.





### **RECOMMENDED ACTION ITEMS SECTION 5.5 (1)**

The licensee has submitted 32 Cold Shutdown Justifications (CSJ) which document the impracticality of testing valves quarterly, during operation, as required by OMa-1988, Part 10. The following deferrals require further action by the licensee:

- \* In CSJ-RH-1 for the Residual Heat Removal (RHR) pumps' discharge check valves 3-0753 A&B and 4-0753 A&B, the licensee has provided no information as to why the valves cannot be verified closed quarterly, because there appear to be available test connections and, as discussed in GL 89-04 Position 3 (Ref. 7), verification of closure may be achieved by a leak test, even if no leakage limits apply. The licensee should revise and resubmit this deferral to discuss any impracticality of verifying closure of these valves quarterly.

### **FPL RESPONSE**

This Cold Shutdown Justification for these valves contained in revision 1 of the IST Program has been revised to provide discussion of the impracticality of performing closure testing quarterly.

### **RECOMMENDED ACTION ITEMS SECTION 5.5 (2)**

- \* In CSJ-SI-1, for the SIS Pump Discharge Unit Cross-Tie, normally open motor operated gate valves MOV-0878 A&B, it is not apparent from the Turkey Point UFSAR, Appendix A, paragraph on "Sharing of the High Head Safety Injection Pumps" under what circumstances these normally open valves would be required to close, nor whether these valves would be required to reopen following closure. The possibility of entering an LCO is not sufficient basis for not performing the required testing, unless the testing renders systems inoperable for an extended period of time. The licensee should full-stroke exercise these valves quarterly within the Technical Specification time of 72 hours, or provide justification that it is impractical to perform the testing during power operation. The licensee should also verify whether a safety function to open (or reopen following closure) exists and revise the Program accordingly.

### **FPL RESPONSE**

The Cold Shutdown Justification for these valves has been rewritten to clarify the situation for which these valves are required to close and further discuss the impracticality of quarterly exercising. In regards to the valve having a safety function to open, no accident scenario could be identified which required these valves to open or reopen following closure.



**RECOMMENDED ACTION ITEMS SECTION 5.5 (3)**

- \* In CSJ-SI-2, for the SI and CS Minimum Flow Line Isolation Valves, normally open motor operated globe valves, MOV-3-0856 A&B, and MOV-4-0856 A&B, the licensee has only specified an exercise closed test in the Valve Program Tables. It appears that these valves have a safety function in the open position as well. The licensee should review the safety function of these valves and revise the program accordingly.

**FPL RESPONSE**

During normal operation, these valves are maintained open to provide a flowpath for the minimum flow recirculation lines associated with the containment spray pumps and associated safety injection pumps. Review of the system operating procedures and emergency operating procedures indicate that these valves are required to close during a design basis accident as part of the realignment of the safety injection system for long term recirculation. Once closed, these valves remain closed for the remainder of the accident scenario and therefore have no safety function to reopen following closure.

**RECOMMENDED ACTION ITEMS SECTION 5.5 (4)**

- \* In CSJ-SI-3 for the locked open RWST Outlet Isolation Valves, motor operated gate valves MOV-3-0864 A&B and MOV-4-0864 A&B, the licensee should also verify whether a safety function to open (or reopen following closure) exists and revise the Program accordingly.

**FPL RESPONSE**

During normal operation, these valves are maintained open to provide suction for the containment spray pumps, low head safety injection pumps and associated high head safety injection pumps. Review of the system operating procedures and emergency operating procedures indicate that these valves are required to close during a design basis accident as part of the realignment of the safety injection system for long term recirculation. Once closed, these valves remain closed for the remainder of the accident scenario and therefore, in regards to accident mitigation, these valves have no safety function to reopen following closure. These valves are also closed following emptying of the contents of the associated refueling water storage tank into the reactor cavity in preparation for refueling. Upon completion of refueling, these valves are reopened to return the contents of the refueling cavity back to the refueling water storage tank, however these operations are not required to bring the unit to the cold shutdown condition nor do they maintain the unit in the cold shutdown condition.



#### **RECOMMENDED ACTION ITEMS SECTION 5.5 (5)**

- \* In CSJ-SI-5, CSJ-SI-6, and CSJ-SI-7, for SIS check valves which are pressure isolation valves, the licensee refers in the Valve Program Tables to an "other relief request" regarding exercising to the closed position. It is not evident what the reference is for the "other relief request" concerning closure testing. Since these are pressure isolation valves, it appears that these valves should be included in Valve Relief Request VR-2. The licensee should refer to the evaluation for VR-2.

#### **FPL RESPONSE**

As discussed previously, VR-2 has been withdrawn in revision 1 of the IST Program. In the Valve Program Tables, the frequency specified for the closure testing of the valves discussed in these cold shutdown justifications has been revised from frequency category 7 ("other (See applicable Request for Relief)") to frequency category 2 ("Cold Shutdown as defined by Tech. Specs.").

#### **RECOMMENDED ACTION ITEMS SECTION 5.5 (6)**

- \* In CSJ-AF-1 for the normally closed, Auxiliary Feedwater Steam Supply Non-return check valves on the inlet to the AFW steam-driven pump turbines, Flow diagrams (5613(4)-M-3075-1) and (5610(4)-M-3075-1) indicate that these valves can be full-stroke exercised open during the Turbine Driven Auxiliary Feedwater Pump quarterly test and therefore, testing quarterly appears practical. However, verifying closure does require isolation to make use of the test connections around these check valves. There are 3 (100%) steam driven pumps for both Units. Only one auxiliary feedwater pump is needed per Unit. Taking one out of service leaves two to serve both Units. The possibility of entering an LCO is not a sufficient basis for not performing the required testing unless testing renders the system inoperable for an extended period of time. The licensee should exercise these valves closed quarterly or revise the deferral to demonstrate that quarterly testing is impractical.

#### **FPL RESPONSE**

The deferral included in revision 1 of the IST Program has been enhanced to demonstrate the impracticality of testing these valves quarterly.

#### **RECOMMENDED ACTION ITEMS SECTION 5.6 (1)**

The licensee has submitted 26 Refueling Outage Justifications (ROJ) which document the

impracticality of testing valves quarterly, during operation, as required by OMa-1988, Part 10. The following deferrals require further action by the licensee:

- \* In ROJ-SA-1 for the normally closed Service Air containment isolation valves 3-40-0205 (4-40-0205), the licensee has not provided justification as to why a reverse seat leakage test could not be performed during cold shutdowns. In its submittal of the Inservice Testing Program for the St. Lucie Unit 2 plant, Revision 2, September 15, 1992, the licensee indicated that analogous valve V-181270 in the Service Air System is full-stroke exercised to the closed position during those cold shutdowns in which the Section of the Service Air system inside containment is in service. Therefore, the licensee should full-stroke exercise the subject valves {3-40-0205 (4-40-0205)} to the closed position during those cold shutdowns when the Service Air system header inside containment is in service or revise this justification to justify deferring full-stroke exercising the subject valves to the closed position during refueling outages.

#### **FPL RESPONSE**

The Refueling Outage Justification for the Service Air check valves has been updated in revision 1 of the IST Program to meet all of the requirements specified in NUREG-1482, Section 4.1.4.

#### **RECOMMENDED ACTION ITEMS SECTION 5.6 (2)**

- \* In the following ROJs there is no seat leakage testing for containment isolation function every 2 years under Appendix J prescribed in the Valve Program Tables. The licensee should verify whether seat leakage testing under Appendix J is being performed:
  - In ROJ-CV-2 for the normally open Charging Header containment isolation check valves 3-0312C (4-0312C), and
  - in ROJ-CV-4 for the normally open RCP Seal Water containment isolation check valves 3-0298A thru 3-0298C (4-0298A thru 4-0298C).

#### **FPL RESPONSE**

Revision 1 of the IST Program has been updated to reflect that these valves are seat leakage tested in accordance with the requirements of 10 CFR 50, Appendix J.



**NRC RECOMMENDED ACTIONS SECTION 5.6 (3)**

- \* In the following ROJs, the proposed alternative provides part-stroke exercising to the open position during cold shutdowns and full-stroke exercising to the open position during refueling outages in accordance with OMa-1988 Part 10 paragraph 4.3.2.2(d), provided that the full-stroke exercising open test is conducted at the maximum required accident flowrate. It appears that the licensee is proposing to perform a reduced pressure flow test as a means of full-stroke exercising the valves open. It is not evident how a reduced pressure flow test alone will verify that the valves are full-stroke exercised open. The licensee should indicate whether the full-stroke open test is conducted at the maximum required accident flowrate as discussed in Generic Letter 89-04, Position 1. If a reduced flowrate is used, a positive means for verifying the valves open to the full-stroke position is required. Such means must meet all the six criteria identified in Position 1. Draft NUREG-1482, Section 4.1.2, further discusses the use of nonintrusive techniques as a means for verifying valve position and the acceptability of sample testing. The licensee should revise the following justifications to clarify the testing method, since they currently do not appear to comply with Generic Letter 89-04, Position 1:
  - In ROJ-SI-5 for the normally closed SIS Cold Leg Injection check valves 3-0875A thru 3-0875C (4-0875A thru 4-0875C), and
  - In ROJ-SI-6 for the normally closed SIS Accumulator Discharge check valves 3-0875D-F (4-0875D-F).

**FPL RESPONSE**

The above referenced refueling outage justifications have been enhanced in revision 1 of the IST Program to address all six of the criteria identified in Generic Letter 89-04, Position 1.





**ATTACHMENT 2 TO L-95-277**

**TURKEY POINT UNITS 3 AND 4  
INSERVICE TESTING PROGRAM, REVISION 1**

