

PRIORITY 1

(ACCELERATED RIDS PROCESSING)

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9512190288 DOC. DATE: 95/12/14 NOTARIZED: NO DOCKET #
 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250
 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251
 AUTH. NAME AUTHOR AFFILIATION
 HOVEY, R.J. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk) *See Rpt.*

SUBJECT: Forwards inservice insp program relief requests 6, 14, 15, 16 & 17.

DISTRIBUTION CODE: A047D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 65
 TITLE: OR Submittal: Inservice/Testing/Relief from ASME Code - GL-89-04

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD2-1 LA	1 1	PD2-1 PD	1 1
	CROTEAU, R	1 1		
INTERNAL:	AEOD/SPD/RAB	1 1	FILE CENTER-01	1 1
	NRR/DE/ECGB	1 1	NRR/DE/EMCB	1 1
	NRR/DE/EMEB	1 1	NUDOCS-ABSTRACT	1 1
	OGC/HDS3	1 0	RES/DET/EMMEB	1 1
	RES/DSIR/EIB	1 1		
EXTERNAL:	LITCO ANDERSON	1 1	NOAC	1 1
	NRC PDR	1 1		

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL
 DESK, ROOM P1-37 (EXT. 504-2083) TO ELIMINATE YOUR NAME FROM
 DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 15 ENCL 14

MAZ

P
R
I
O
R
I
T
Y

D
O
C
U
M
E
N
T



FPL

DEC 14 1995

L-95-237
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
Inservice Inspection Program
Relief Requests Nos. 6, 14, 15, 16, and 17

By letters L-93-220, dated September 9, 1993, and L-94-118, dated May 31, 1994, 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. NRC letter dated March 31, 1995, documented the Staff's review and evaluation of Turkey Point Units 3 and 4 ISI Program and associated relief requests. Per NRC letter dated March 31, 1995, Relief Request No. 6, Paragraph IWA-6620, Preparation of Owner's Reports, Forms NIS-1 and NIS-2, and Submittal of 90-Day Summary Reports, was denied. Code Case N-532, "Alternative Requirements to Repair and Replacement Documentation Requirements and Inservice Summary Report Preparation and Submission as Required by IWA-4000 and IWA-6000, Section XI, Division 1," was approved by ASME on December 12, 1994. Attached please find revised Relief Request No. 6 for your consideration. NRC review and approval of revised Relief Request No. 6 is requested by February 22, 1997.

On May 18, 1994, Turkey Point Unit 3 finished its first refueling outage for the third ten year interval. Pursuant to 10 CFR 50.55a(g)(5)(iii), FPL has determined that conformance with certain code requirements was impractical for Turkey Point Unit 3. Attached please find Relief Request No. 14, Impractical ISI Requirements, for the Turkey Point Unit 3, Class 1 and 2 pressure retaining, similar and dissimilar metal welds in vessels and piping. NRC review and approval of Relief Request No. 14 is requested by February 22, 1997.

On November 14, 1994, Turkey Point Unit 4 finished its first refueling outage for the third ten year interval. Pursuant to 10 CFR 50.55a(g)(5)(iii), FPL has determined that conformance with certain code requirements was impractical for Turkey Point Unit 4. Attached please find Relief Request No. 15, Impractical ISI Requirements, for the Turkey Point Unit 4, Class 1 pressure retaining, similar and dissimilar metal welds in vessels and piping. NRC review and approval of Relief Request No. 15 is requested by February 22, 1997.

9512190288 951214
PDR ADDCK 05000250
Q PDR

an FPL Group company

AD 171

L-95-237

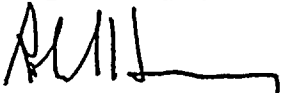
Page 2

Additionally, Relief Request No. 16, Pressure Tests for Repairs/Replacements, documents FPL's request to use ASME Code Case N-416-1 for Turkey Point Units 3 and 4. Please note that relief is requested from performing the system hydrostatic tests on the Turkey Point Units 3 and 4 steam generator nozzle to reducer weld joints previously committed to in FPL letter L-93-139, dated May 17, 1993. NRC review and approval of Relief Request No. 16 is requested by February 22, 1997.

Relief Request No. 17, Turkey Point Unit 4 Class 2 Steam Generator Nozzle to Shell Weld and Inner Radius Section, documents FPL's request of relief from reexamining the initially selected components over the service lifetime of the component for the nozzle to shell weld and inside radius section on the steam generator main steam nozzle, for Turkey Point Unit 4. NRC review and approval of Relief Request No. 17 is requested by February 22, 1997.

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

Very truly yours,



Robert J. Hovey
Vice President
Turkey Point Plant

OIH

Attachment

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

Attachment to
L-95-237
Page 1

**TURKEY POINT UNITS 3 AND 4
REVISED RELIEF REQUEST NO. 6**

**PARAGRAPH IWA-6620, PREPARATION OF OWNER'S REPORTS,
FORMS NIS-1 AND NIS-2, AND SUBMITTAL OF 90-DAY SUMMARY REPORTS**

9512190288



RELIEF REQUEST NUMBER 6

A. Article Identification:

Turkey Point Units 3 and 4

Article IWA-4000 Repair Procedures
Article IWA-6000 Records and Reports
Article IWA-7000 Replacement Procedures

B. Article Requirements:

Paragraph IWA-4800

The records required by IWA-6000 shall be completed for all repairs.

Paragraph IWA-6210(c)

The owner shall prepare inservice inspection summary reports for Class 1 and 2 pressure retaining components and their supports.

Paragraph IWA-6220(c)

Inservice Inspection summary reports shall be required at the completion of each inspection conducted during a refueling outage. Examinations, tests, replacements and repairs conducted since the preceding summary report shall be concluded.

Paragraph IWA-6220(d)

Each summary report shall contain the following:

- (2) Owner's Report for Inservice Inspections, Form NIS-1.
- (3) Owner's Report for Repair or Replacement, Form NIS-2.

Paragraph IWA-6230

... and within 90 days of the completion of the inservice inspection conducted during each refueling outage, the owner shall file inservice inspection summary reports with the enforcement and regulatory authorities having jurisdiction at the plant site.

Paragraph IWA-7520(a)

(8) Completed Owner's Report for Repairs or Replacements, Form NIS-2.

C. Relief Requested:

Relief is requested from the following:

1. Preparation of the Owner's Report for Inservice Inspection, Form NIS-1.
2. Preparation of the Owner's Report for Repair or Replacement, Form NIS-2.
3. Submittal of the summary report following completion of the inspections conducted during each refueling outage.

D. Basis for Relief:

Code Case N-532, "Alternative Requirements to Repair and Replacement Documentation Requirements and Inservice Summary Report Preparation and Submission as Required by IWA-4000 and IWA-6000, Section XI, Division 1," was approved for use by ASME on December 12, 1994. This code case addresses alternative methods of documenting repairs, replacements, and inservice inspections.

The alternative methods proposed by the code case include a revised version of the current NIS-1 and NIS-2 form. The new single page form serves as a certification record which documents conformance to Section XI requirements.

The revised Form NIS-2A eliminates the need to list each individual item used in a replacement. Instead, this information is to be documented within a separate Repair/Replacement Plan. Upon completion of all required replacement activities, the Repair/Replacement Certification Record, Form NIS-2A, is presented to the Authorized Nuclear Inservice Inspector for acceptance. Both the Plan and Form NIS-2A are maintained on file by the Owner. An index or abstract used to track completed repair or replacement activities is later submitted as an attachment to the Owner's Activity Report, Form OAR-1.

In addition to the revised NIS-2 Form, Code Case N-532 provides alternatives to the preparation and submittal of the inservice inspection summary report and Form NIS-1, currently prepared in accordance with the requirements of IWA-6220 and IWA-6310.

These changes eliminate the need to document information on more than one record and the submittal of numerous NIS-2 reports.

E. Alternative Examinations or Tests:

As an alternative to the present requirements of IWA-6220 and IWA-6230, FPL proposes to follow the guidelines of Code Case N-532 as follows:

1. A Repair/Replacement Plan will be prepared prior to the start of repair or replacement activities. Each Plan will describe the conditions and elements required by IWA-4130 and IWA-7130. Each Plan shall be identified and tracked by a unique identification number, which could be a Plant Work Order (PWO) number, Construction Work Order (CWO) number, or other unique tracking number designated by the plant.
2. Upon completion of the repair or replacement activity, FPL will prepare a Repair/Replacement Certification Record, Form NIS-2A. The form will be presented to the inspector for acceptance and be maintained on file.
4. After each refueling outage, FPL shall prepare an Owner's Activity Report Form, OAR-1, which lists applicable tests and examinations. Test and Exam information will be maintained in an abstract (or index) similar to Table 1.
5. The OAR-1 will identify items with flaws or relevant conditions and a summary of the applicable evaluation. This information shall be maintained in an abstract (or index) similar to Table 2.
6. An abstract (or index) similar to Table 3, which lists each Repair and Replacement Plan by its identification number, shall be maintained. The index shall also indicate the inspection interval and period when the repair or replacement was completed.
7. At the end of each inspection period, a copy of the OAR-1 and applicable attachments will be filed with the enforcement and regulatory authorities who have jurisdiction at the plant site, following the end of the inspection period.
8. References to the 1992 Edition of Section XI will be replaced by the appropriate portion of the 1989 Edition.



Attachment to
L-95-237
Page 5

9. Repair/Replacement Plans describing the repair or replacement activity and containing the essential information as described by IWA-4000 and IWA-7000, will be available for inspection at any time.

F. Implementation Schedule:

This request for relief will be utilized during the second and third inspection periods of the third inservice inspection interval.

G. Attachments to the Relief:

Copy of Code Case N-532

CASES OF ASME BOILER AND PRESSURE VESSEL CODE

Approval Date: December 12, 1994
See Numeric Index for expiration
and any reaffirmation dates.

Code Case N-532

Alternative Requirements to Repair and Replacement Documentation
Requirements and Inservice Summary Report Preparation and
Submission as Required by IWA-4000 and IWA-6000.

Section XI, Division 1

Inquiry: What alternatives may be used to the requirements of
IWA-4910(d) and IWA-6210(e) for completion of Form NIS-2
following repair or replacement, and IWA-6210(c) and (d), IWA-
6220, IWA-6230(b), (c), and (d), and IWA-6240(b) for preparation
and submittal of the inservice summary report and Form NIS-1?

Reply: It is the opinion of the Committee that as an alternative
to the requirements of IWA-4910(d), IWA-6210(c), (d), and (e),
IWA-6220, IWA-6230(b), (c), and (d), and IWA-6240(b), the
following provisions may be used. This Case shall be utilized at
least until the end of the inspection period in which it was
invoked.

1.0 CERTIFICATION OF THE REPAIR OR REPLACEMENT

- (a) The Owner's Repair/Replacement Program shall identify
use of this Case.
- (b) A Repair/Replacement Plan shall be prepared in
accordance with IWA-4140, and shall be given a unique
identification number.
- (c) Upon completion of all required activities as
associated with the Repair/Replacement Plan, the Owner
shall prepare a Repair/Replacement Certification
Record, Form NIS-2A.
- (d) Form NIS-2A shall be presented to the Inspector for
certification.
- (e) The completed Form NIS-2A shall be maintained by the
Owner.
- (f) The Owner shall maintain an index of Repair/Replacement
Plans in accordance with IWA-6340. The index shall
identify the identification number required by (b)
above and the inspection interval and period during
which each repair or replacement was completed.

2.0 OWNER'S ACTIVITY REPORT PREPARATION AND SUBMITTAL

An Owner's Activity Report Form OAR-1 shall be prepared and certified upon completion of each refueling outage. Each Form OAR-1 prepared during an inspection period shall be submitted following the end of the inspection period. Each Form OAR-1 shall contain the following:

- (a) Abstract of applicable examinations and tests with the information and format of Table 1.
- (b) A listing of item(s) with flaws or relevant conditions that required evaluation to determine acceptability for continued service, whether or not the flaw or relevant condition was discovered during a scheduled examination or test. The listing shall provide the information in the format of Table 2.
- (c) Abstract for repairs, replacements and corrective measures performed, which were required due to an item containing a flaw or relevant condition that exceeded IWB-3000, IWC-3000, IWD-3000, IWE-3000, IWF-3000, or IWL-3000 acceptance criteria; even though the discovery of the flaw or relevant condition that necessitated the repair, replacement or corrective measure, may not have resulted from an examination or test required by this Division. If acceptance criteria for a particular item is not specified in this Division, the provisions of IWA-3100(b) shall be used to determine which repairs, replacements, and corrective measures are required to be included in the abstract. The abstract shall provide the information in the format of Table 3.

FORM NIS-2A REPAIR/REPLACEMENT CERTIFICATION RECORD

OWNER'S CERTIFICATE OF CONFORMANCE

I certify the _____ represent by Repair/Replacement Plan
_____ repair or replacement.

Number _____ conforms to the requirements of Section XI.

Type Code Symbol Stamp _____

Certificate of Authorization No. _____ Expiration Date _____
Owner of Owner's Designee, Title _____

CERTIFICATE OF INSERVICE INSPECTION

I, the undersigned, holding a valid commission issued by the National Board of Boiler and Pressure Vessel Inspectors and the State or Province of _____ and employed by _____ of _____ have inspected the items described in Repair/Replacement Plan number _____ during the period _____ to _____, and state that to the best of my knowledge and belief, the Owner has performed all the activities described in the Repair/Replacement Plan in accordance with the requirements of Section XI.

By signing this certificate neither the Inspector nor his employer makes any warranty, expressed or implied, concerning the activities described in the Repair/Replacement Plan. Furthermore, neither the inspector nor his employer shall be liable in any manner for any personal injury or property damage or loss of any kind arising from or connected with this inspection.

Inspector's Signature _____ Commissions _____
National Board, State, Province, and Endorsements

Date _____

Attachment to
L-95-237
Page 9

FORM OAR-1 OWNER'S ACTIVITY REPORT

Report Number _____
Owner _____
(Name and Address of Owner)
Plant _____
(Name and Address of Plant)
Unit No. _____ Commercial Service Date _____ Refueling Outage No. _____
(If applicable)
Current Inspection Interval _____
(1st, 2nd, 3rd, 4th, other)
Current Inspection Period _____
(1st, 2nd, 3rd)
Edition and Addenda of Section XI applicable to the inspection plan _____
Date and Revision of inspection plan _____
Edition and Addenda of Section XI applicable to repairs and replacements, if different than the inspection plan _____

CERTIFICATE OF CONFORMANCE

I certify that the statements made in the Owner's Activity Report are correct, and that the examinations, tests, repairs, replacements, evaluations, and corrective measures represented by this report conform to the requirements of Section XI.

Certificate of Authorization No. _____ Expiration Date _____
(If applicable)
Signed _____ Date _____
Owner or Owner's Designee, Title

CERTIFICATE OF INSERVICE INSPECTION

I, the undersigned, holding a valid commission issued by the National Board of Boiler and Pressure Vessel Inspectors and the State or Province of _____ and employed by _____ of _____ have inspected the items described in this Owner's Activity Report, during the period _____ to _____, and state that to the best of my knowledge and belief, the Owner has performed all activities represented by this report in accordance with the requirements of Section XI.

By signing this certificate neither the Inspector nor his employer makes any warranty, expressed or implied, concerning the examinations, tests, repairs, replacements, evaluations, and corrective measures described in this report. Furthermore, neither the inspector nor his employer shall be liable in any manner for any personal injury or property damage or loss of any kind arising from or connected with this inspection.

Inspector's Signature _____ Commissions _____
National Board, State, Province, and Endorsements

Date _____

TABLE 1
ABSTRACT OF EXAMINATIONS AND TESTS

Examination Category	Total Examinations Required for the Interval	Total Examinations Credited for this Period	Total Examinations Credited (%) for the Period	Total Examinations Credited (%) to Date for the Interval	Remarks
----------------------	--	---	--	--	---------

TABLE 2
ITEMS WITH FLAWS OR RELEVANT CONDITIONS THAT
REQUIRED EVALUATION FOR CONTINUED SERVICE

Examination Category	Item Number	Item Description	Flaw Characterization (IWA-3300)	Flaw or Relevant Condition Found During Scheduled Section XI Examination or Test (Yes or No)
----------------------	-------------	------------------	----------------------------------	--

TABLE 3
ABSTRACT OF REPAIRS, REPLACEMENTS, OR
CORRECTIVE MEASURES
REQUIRED FOR CONTINUED SERVICE

Code Class	Repair, Replacement, or Corrective Measure	Item Description	Description of Work	Flaw or Relevant Condition Found During Scheduled Section XI Examination or Test (Yes or No)	Date Complete	Repair/Replacement Plan Number
------------	--	------------------	---------------------	--	---------------	--------------------------------



Attachment to
L-95-237
Page 11

**TURKEY POINT UNIT 3
RELIEF REQUEST NO. 14**

IMPRACTICAL INSERVICE INSPECTION REQUIREMENTS

RELIEF REQUEST NO. 14

A. Component Identification:

Class 1 and Class 2 pressure retaining similar and dissimilar metal welds in vessels and piping found during the 1994 outage at Turkey Point Unit 3.

B. Examination Requirements:

Rules for Inservice Inspection of Nuclear Power Plant Components, Section XI, 1989 Edition with no Addenda

Category	Item No.	Examination Requirements
B-D	B3.140	Fig. IWB-2500-7(a through d), area defined by M-N-O-P
B-F	B5.70	Fig. IWB-2500-8(b), weld and 1/2" to each side of the weld, 1/3t from the inside surface out to 1/4" from a line drawn from the toe of the outside surface weld crown (area C-D-E-F)
B-J	B9.11	Fig. IWB-2500-8(b), weld and 1/2" to each side of the weld, 1/3t from the inside surface out to 1/4" from a line drawn from the toe of the outside surface weld crown (area C-D-E-F)
C-F-1	C5.11	Fig. IWC-2500-7(a), surface of weld and 1/2" of surface base metal (area A-B), 1/3t from the inside surface out to 1/4" from a line drawn from the toe of the outside surface weld crown (area C-D-E-F)
C-F-2	C5.51	Fig. IWC-2500-7(b), surface of weld and 1/2" of surface base metal (area A-B), 1/3t from the inside surface out to 1/4" from a line drawn from the toe of the outside surface weld crown (area C-D-E-F)

ASME Code Case N-460 - Alternative Examination Coverage for
Class 1 and Class 2 Welds

C. Relief Requested:

Relief is requested from the required code examination area during volumetric and surface examinations.

D. Basis for Relief:

Several welds examined during the 1994 outage did not receive the required volumetric examinations due to one or more factors:

1. Portions of the required volumetric area are inaccessible due to permanent physical obstructions.
2. Some welds could be examined from only one side due to the configuration of the component, high attenuation of the ultrasonic sound, or other technical reason.

FPL performed the examinations to the extent possible. The surface and volumetric examinations performed along with the required system pressure tests provide assurance of an acceptable level of quality and safety. The attached table summarizes the percent of coverage achieved and references specific figures that show the extent of the limitations.

E. Alternative Examinations or Tests:

1. Volumetric and surface examinations were performed to the extent possible.
2. System pressure tests as required by ASME Section XI.
3. Monthly walkdowns by system engineers are performed on Class 2 systems outside containment to check for leakage, piping configuration, and/or damage. During outages, system engineers walkdown Class 1 and Class 2 systems inside containment. This walkdown is performed to look for system anomalies which could affect plant performance.

The examination volume achieved by surface and/or ultrasonic examination, combined with the system pressure tests and system engineer walkdowns, provide an acceptable level of quality and safety. If permanent obstructions are removed for other reasons, FPL will examine those areas that become accessible to the extent practical.

F. Implementation Schedule:

These examinations were performed during the first outage of the first period of the third inservice inspection interval, from April 4, 1994 through May 4, 1994.

G. Attachments.

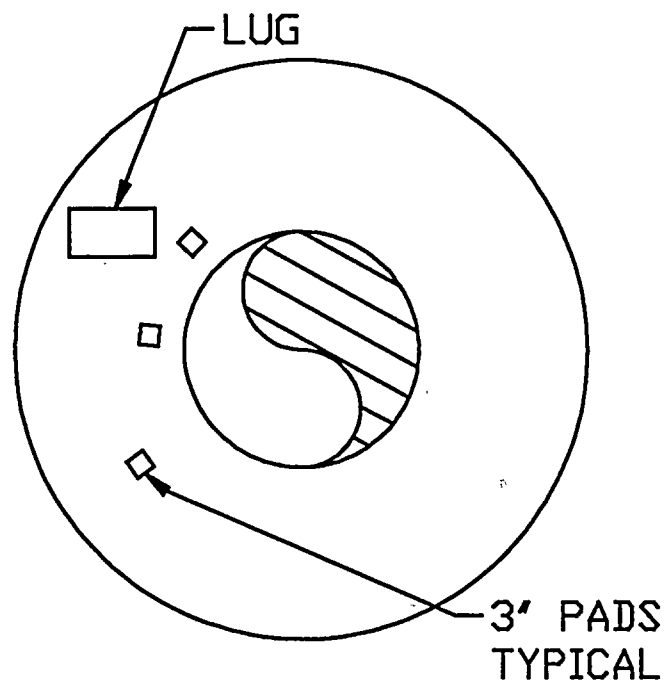
Table showing areas where limited examinations were performed and the extent of coverage.

Sketches of areas with limited examinations (sketches are for illustrative purposes and are not to scale.)

Catgy/ Item No.	Zone	Item	NDE Technique	Angle and Technique			Configuration or Limitations	Fig. No.	Comments / % Coverage
				1/2 V	Full V	11/2 V			
B-D B3.140	3-004	3-SGB-I-IRS 3-SGB-O-IRS	UT	45	-	-	Welded on pads, support, and IRS configuration	94-3-1	70% coverage achieved in two directions
B-D B3.120	3-006	3-SRGN-01-IR	UT	30 60	- -	- -	Heater penetrations limited the exam area	94-3-2	55% coverage from 2 directions
B-F B5.70	3-010	31"-RCS-1302-5	UT	45	-	-	Steam generator nozzle to elbow	94-3-3	75% from the elbow side, 0% from the nozzle side
B-J B9.11	3-010	31"-RCS-1302-10	UT	45	-	-	Elbow to pump casing	94-3-4	75% from the elbow side, 0% from the pump side
B-J B9.11	3-011	29"-RCS-1305-3	UT	45	-	-	Branch connection limits 18", elbow configuration limits exam	94-3-5	93% from pipe side, 69% from elbow side
B-F B5.70	3-011	29"-RCS-1305-4	UT	45	-	-	Nozzle to elbow	94-3-6	43% from elbow side, 2% from nozzle side
B-J B9.11	3-012	27.5"-RCS-1306-11	UT	45	-	-	Pump casing to pipe	94-3-7	0% from the pump side, 100% from pipe side
B-J B9.11	3-016	12"-RC-1301-1	UT	45	-	60	Branch connection to pipe	94-3-8	100% from the pipe side, 67% from the branch connection side
B-J B9.11	3-038	10"-SI-1302-1	UT	45	-	60	Elbow to valve 3-875B	94-3-9	100% from the elbow side, 85% from the valve side
B-J B9.11	3-038	10"-SI-1302-4	UT	45	-	60	Elbow to valve 3-875B	94-3-10	85% from the elbow side, 25% from the valve side
C-F-1 C5.11	3-089	8"-SI-2309-22	UT	45	-	60	Pipe to tee	94-3-11	100% from the pipe side, 47% from the tee side

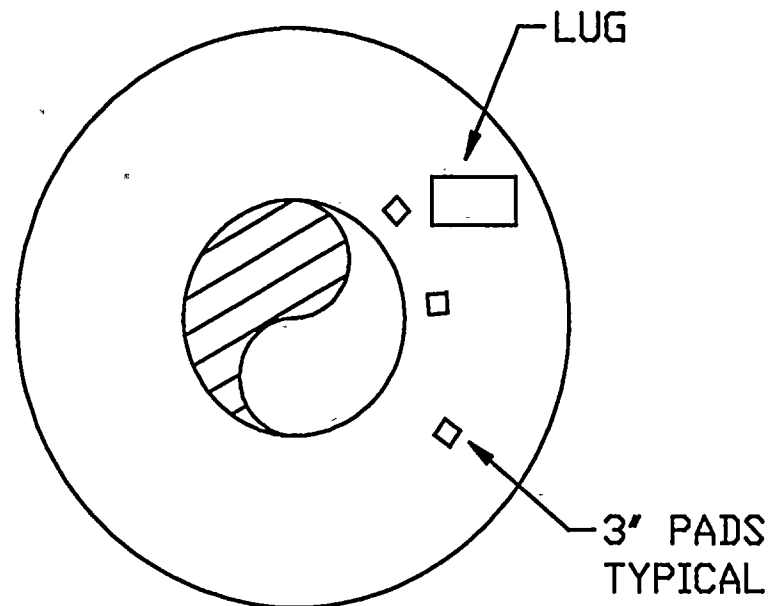
Attachment to
L-95-237
Page 16

Catgy/ Item No.	Zone	Item	NDE Technique	Angle and Technique			Configuration or Limitations	Fig. No.	Comments / % Coverage
				1/2 V	Full V	1 1/2 V			
C-F-1 C5.11	3-089	8"-SI-2309-24	UT	45	-	60	Pipe to valve 3-876E	94-3-12	100% from the pipe side, 0% from the valve side
C-F-2 C5.51	3-103	6"-BDA-2301-8	UT	-	60	45	Tee to pipe	94-3-13	100% from Pipe Side, 50% from Tee Side



3-SGB-I-IRS

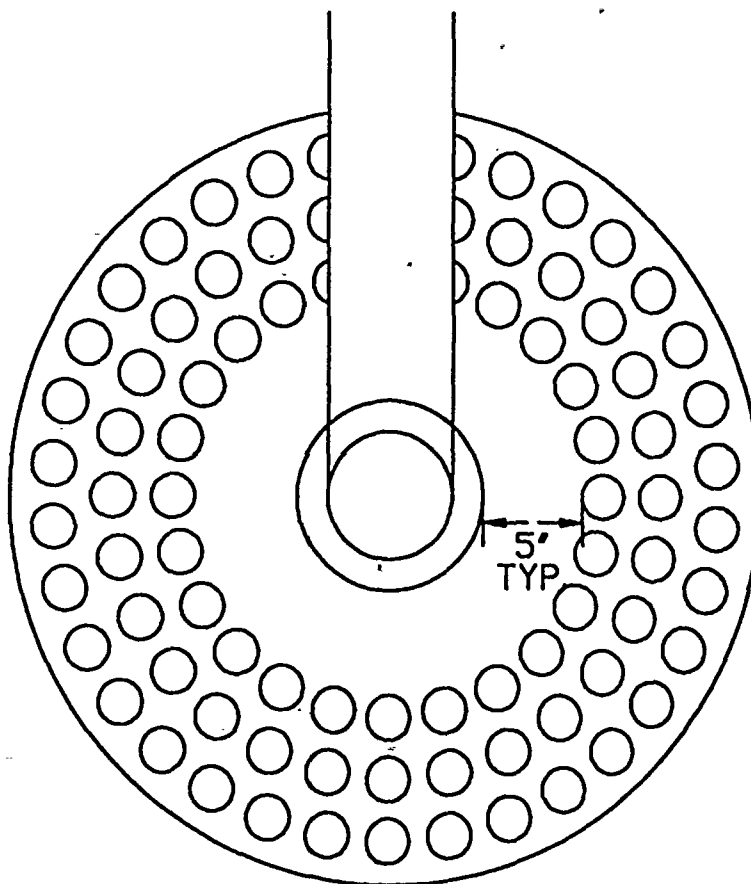
INLET NOZZLE INNER RADIUS



3-SGB-O-IRS

OUTLET NOZZLE INNER RADIUS

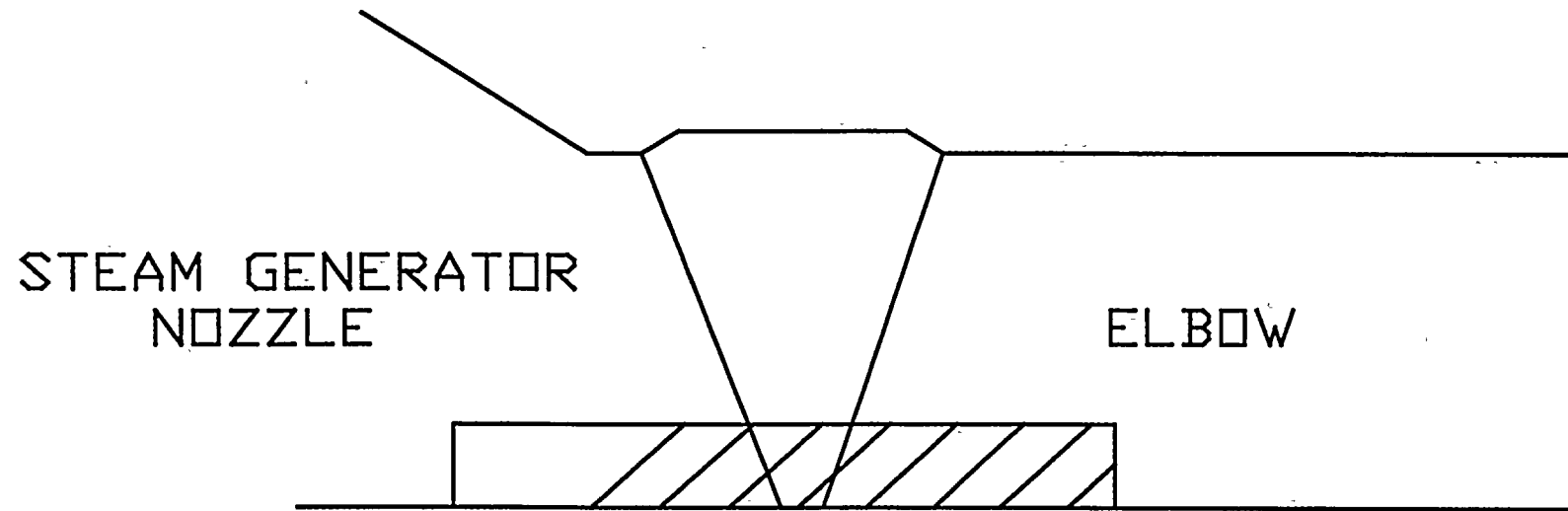
FIGURE 94-3-1



PRESSURIZER SURGE NOZZLE
3-SRGN-01-IR

FIGURE 94-3-2





31"-RCS-1302-5

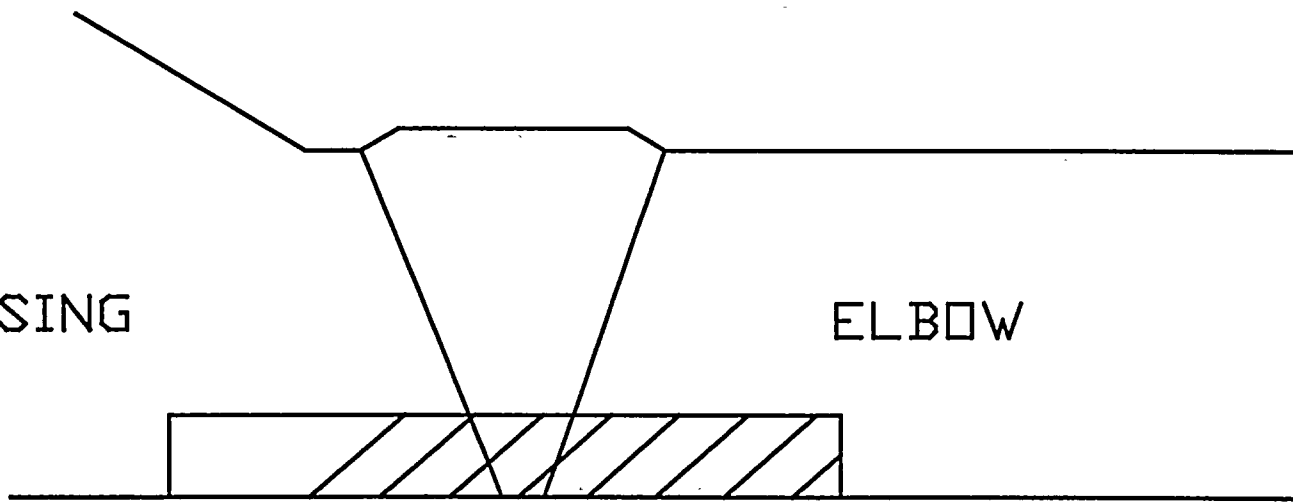
FIGURE 94-3-3

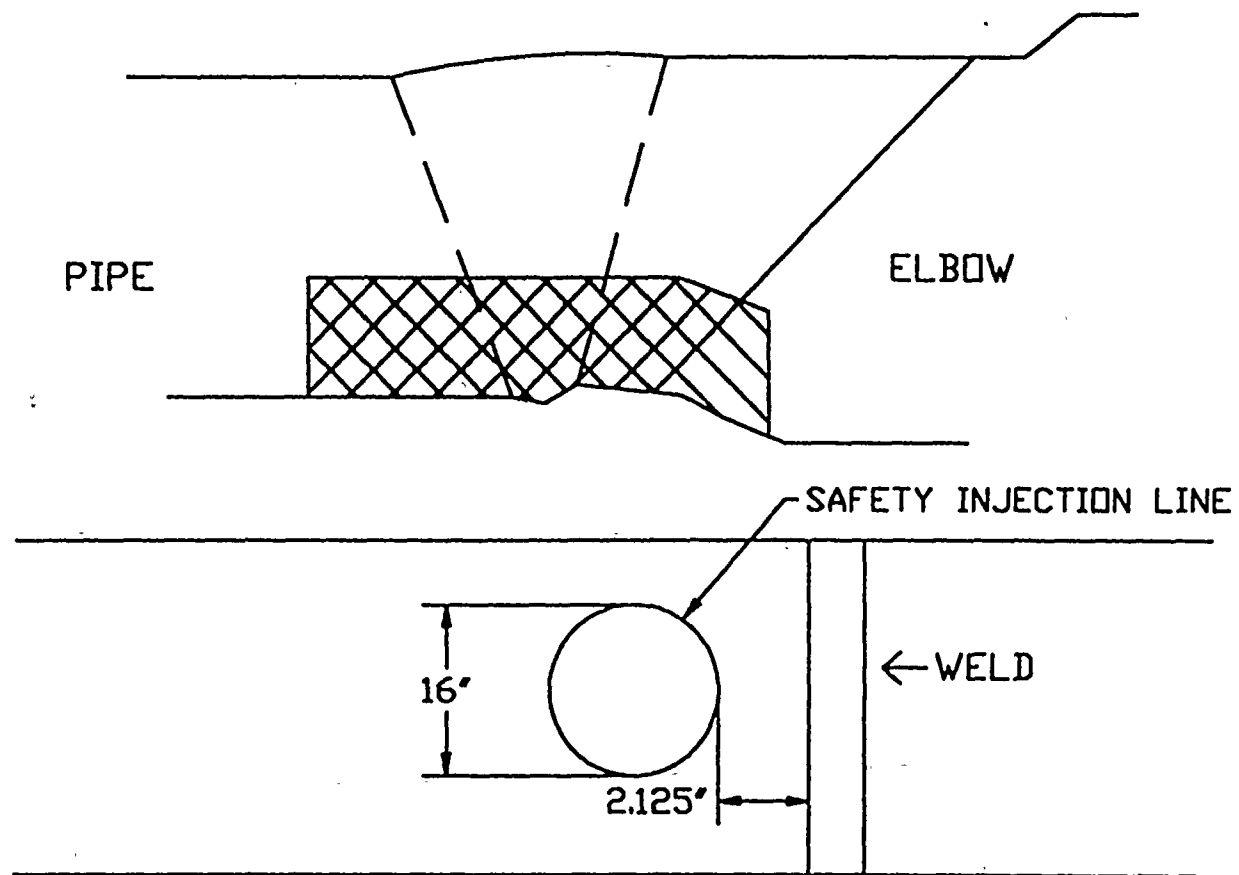
PUMP CASING

ELBOW

31"-RCS-1302-10

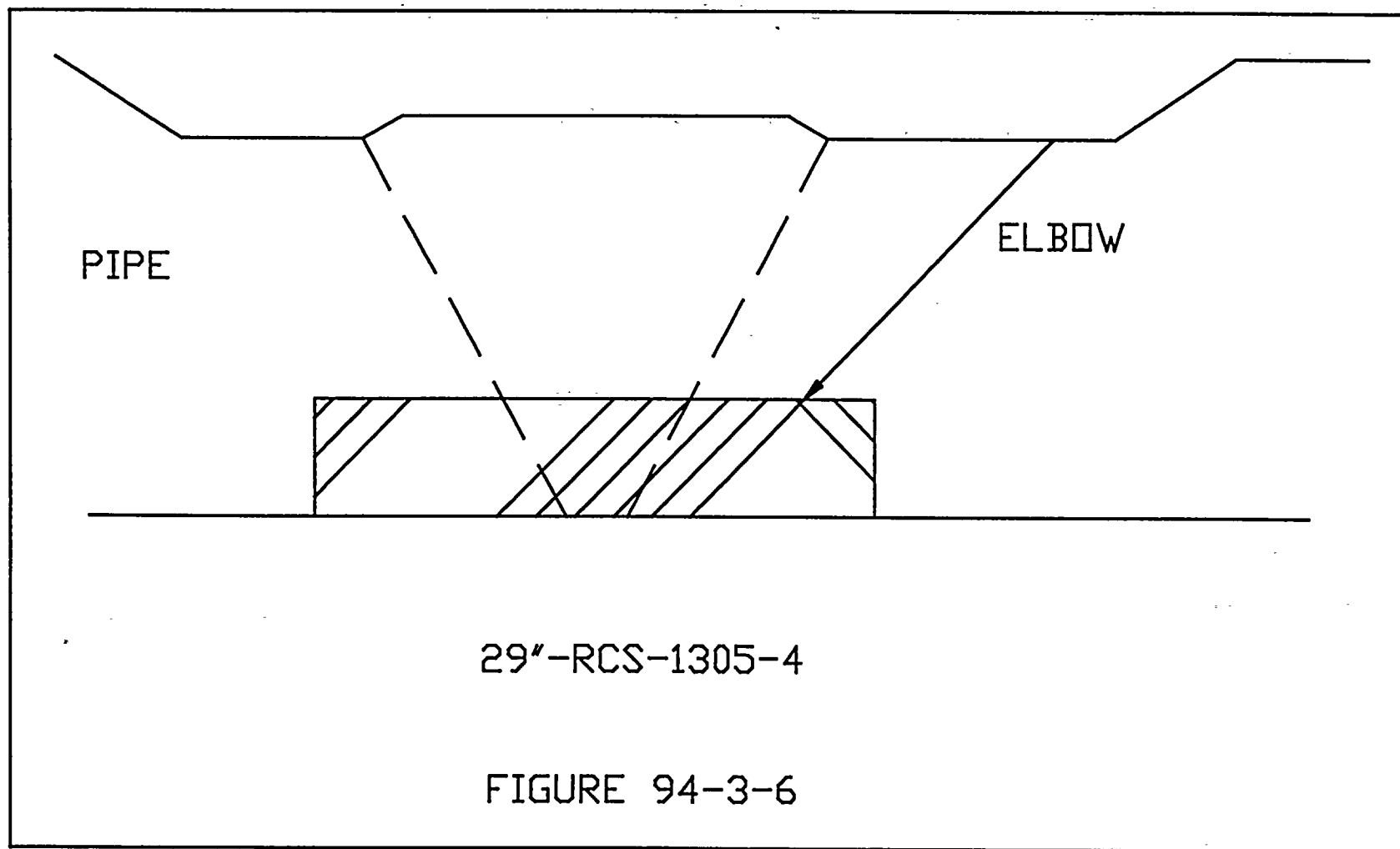
FIGURE 94-3-4

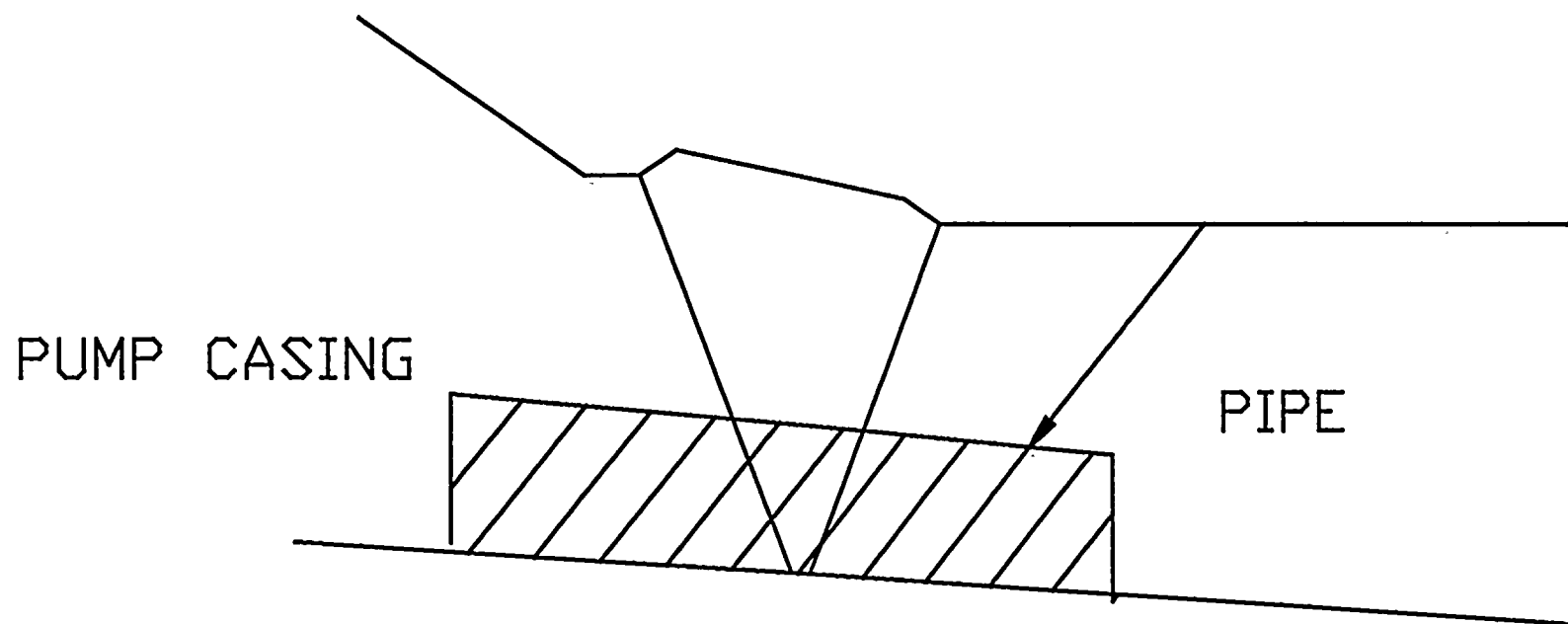




29"-RCS-1305-3

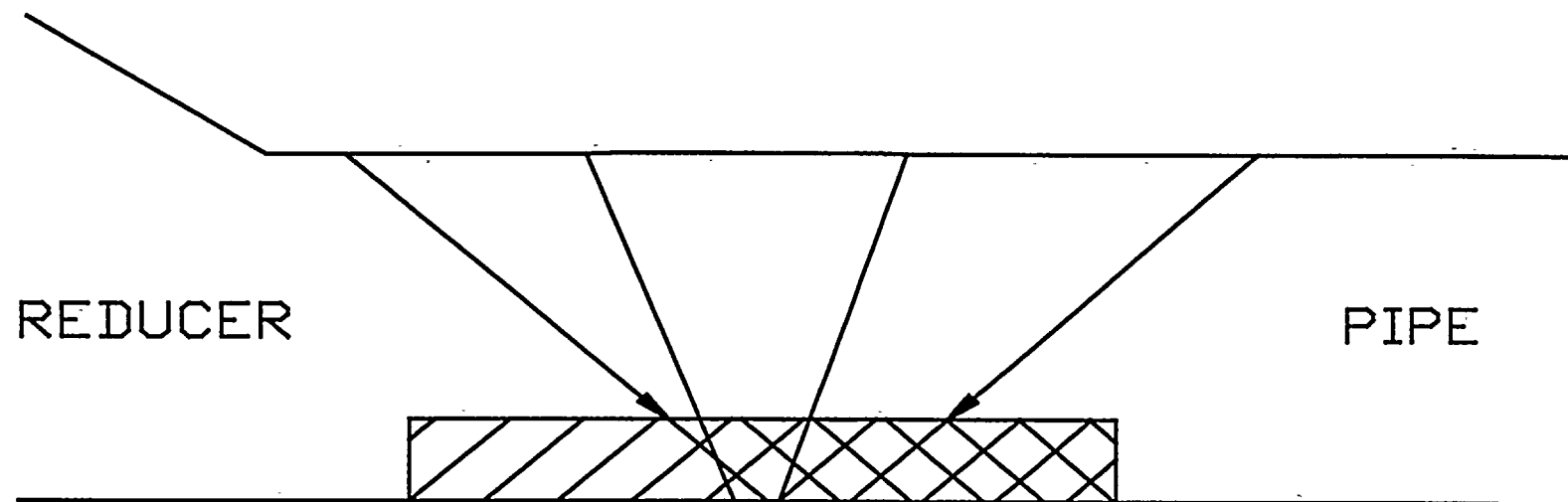
FIGURE 94-3-5





27.5"-RCS-1306-11

FIGURE 94-3-7



12"-RC-1301-1

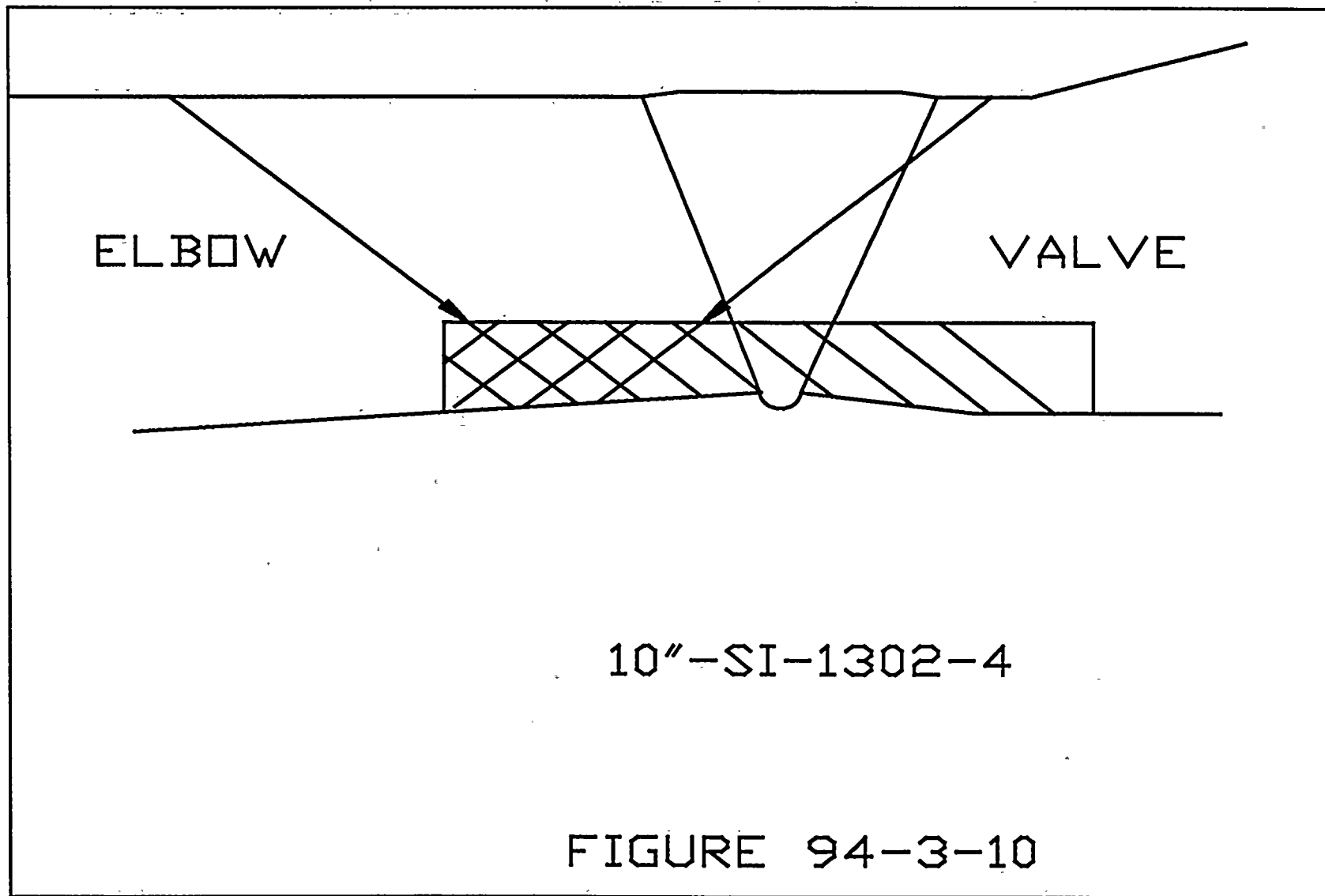
FIGURE 94-3-8

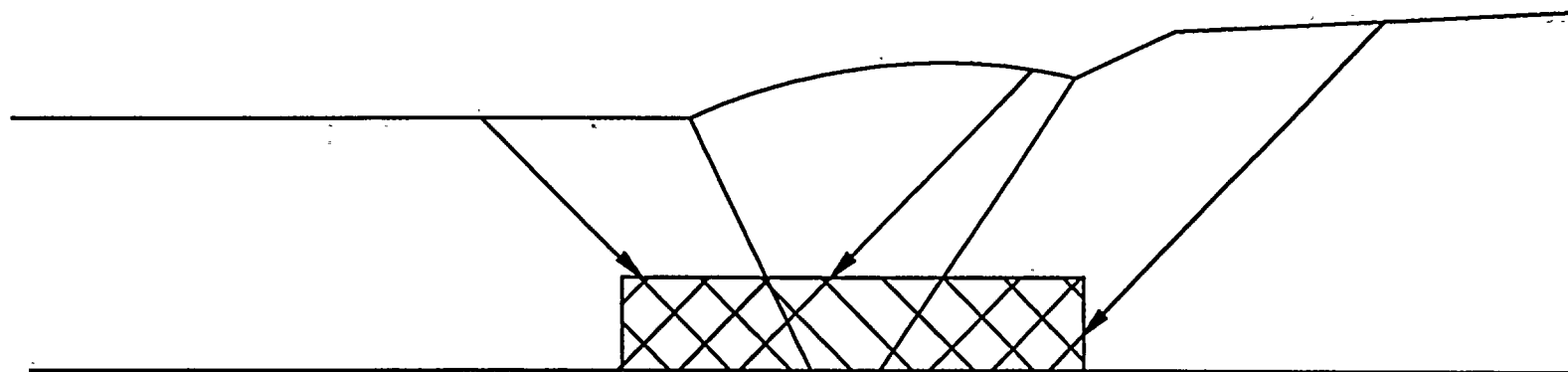
ELBOW

BRANCH
CONNECTION

10"-SI-1302-1

FIGURE 94-3-9

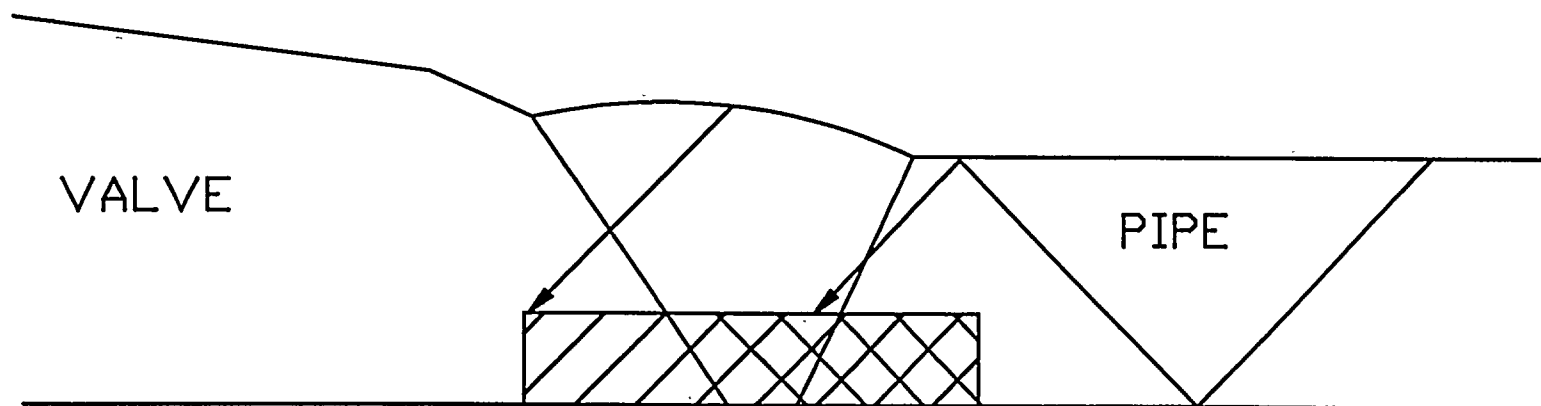




8"-SI-2309-22

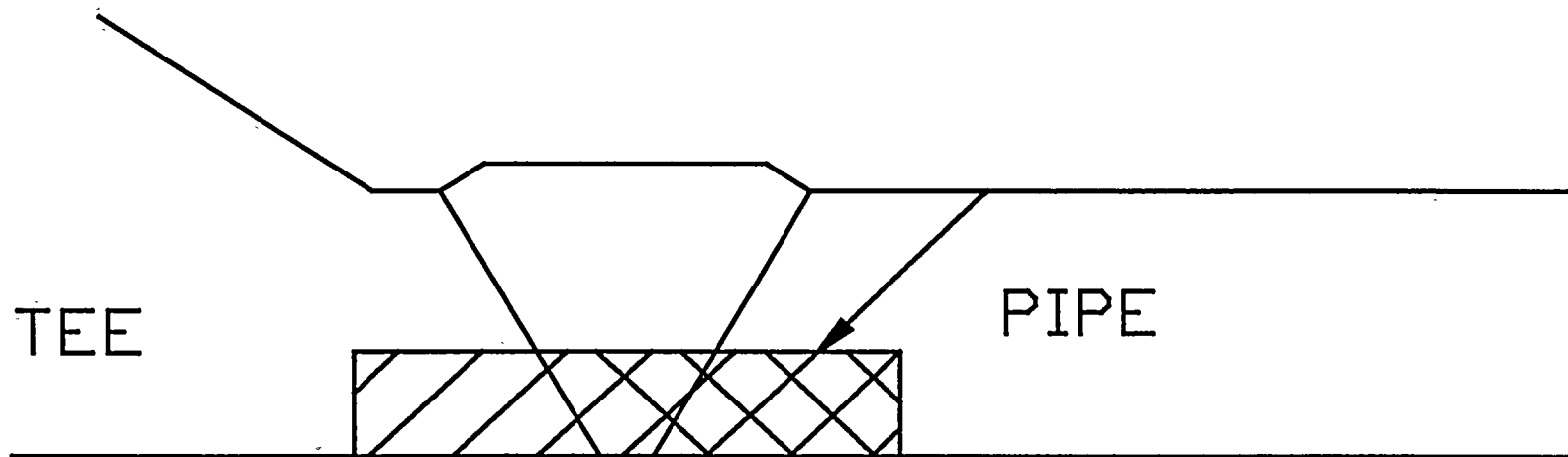
FIGURE 94-3-11

VALVE SURFACE IS IN
THE AS-CAST CONDITION.
NOT CONDUCTIVE TO PROPER
EXAMINATION.



8"-SI-2309-24

FIGURE 94-3-12



6"-BDA-2301-8

FIGURE 94-3-13



Attachment to
L-95-237
Page 30

**TURKEY POINT UNIT 4
RELIEF REQUEST NO. 15**

IMPRACTICAL INSERVICE INSPECTION REQUIREMENTS

RELIEF REQUEST NO. 15

A. Component Identification:

Class 1 pressure retaining similar and dissimilar metal welds in vessels and piping found during the 1994 outage at Turkey Point Unit 4.

B. Examination Requirements:

Rules for Inservice Inspection of Nuclear Power Plant Components, Section XI, 1989 Edition with no Addenda

Category	Item No.	Examination Requirements
B-D	B3.140	Fig. IWB-2500-7(a through d), area defined by M-N-O-P
B-F	B5.70	Fig. IWB-2500-8(b), weld and 1/2" to each side of the weld
B-J	B9.11	Fig. IWB-2500-8(b), weld and 1/2" to each side of the weld, 1/3t from the inside surface out to 1/4" from a line drawn from the toe of the outside surface weld crown (area C-D-E-F)
	B9.31	Fig. IWB-2500-10, weld and 1/2t or 1" (whichever is less) to each side of the weld, 1/3t from the inside surface out to 1/4" from a line drawn from the toe of the outside surface weld crown (area C-D-E-F)

ASME Code Case N-460 - Alternative Examination Coverage for Class 1 and Class 2 Welds

C. Relief Requested:

Relief is requested from the required code examination area during volumetric and surface examinations.

D. Basis for Relief:

Several welds examined during the first outage of the first period of the third ISI inspection interval did not receive the required volumetric and/or surface examinations due to one or more factors:

1. Portions of the required volumetric and surface area are inaccessible due to permanent physical obstructions.
2. Some welds could be examined from only one side due to the configuration of the component, high attenuation of the ultrasonic sound, or other technical reason.

FPL performed the examinations to the extent possible. The surface and volumetric examinations performed along with the required system pressure tests provide assurance of an acceptable level of quality and safety. The attached table summarizes the percent of coverage achieved and references specific figures that show the extent of the limitations.

E. Alternative Examinations or Tests:

1. Volumetric and surface examinations were performed to the extent possible.
2. System pressure tests as required by ASME Section XI.
3. Monthly walkdowns by system engineers are performed on Class 2 systems outside containment to check for leaks, piping configuration, and/or damage. During outages, system engineers walkdown Class 1 and Class 2 systems inside containment. This walkdown is performed to look for system anomalies which could affect plant performance.

The examination volume achieved by surface and/or ultrasonic examination, combined with the system pressure tests and system engineer walkdowns, provide an acceptable level of quality and safety. If permanent obstructions are removed for other reasons, FPL will examine those areas that become accessible to the extent practical.

F. Implementation Schedule:

These examinations were performed during the first outage of the first period of the third inservice inspection interval, from October 3, 1994 through November 14, 1994.



Attachment to
L-95-237
Page 33

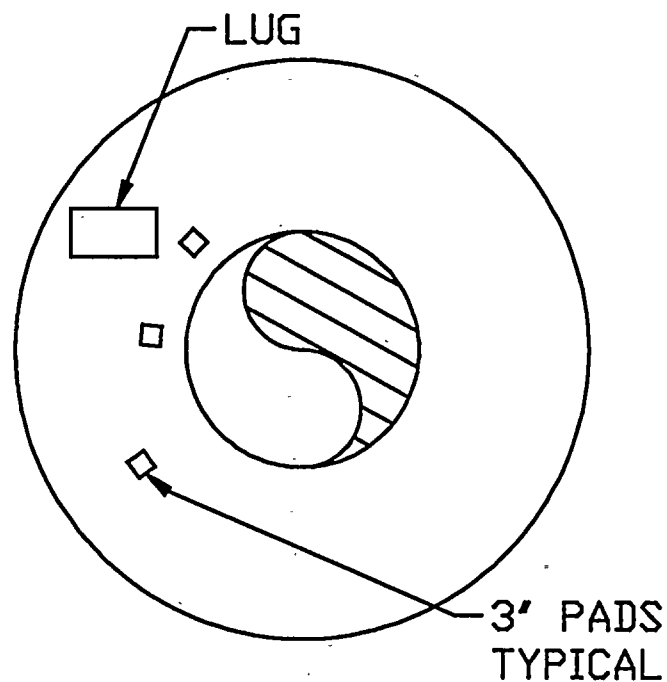
G. Attachments

Table showing areas where limited examinations were performed and the extent of coverage.

Sketches of areas with limited examinations (sketches are for illustrative purposes and are not to scale.)

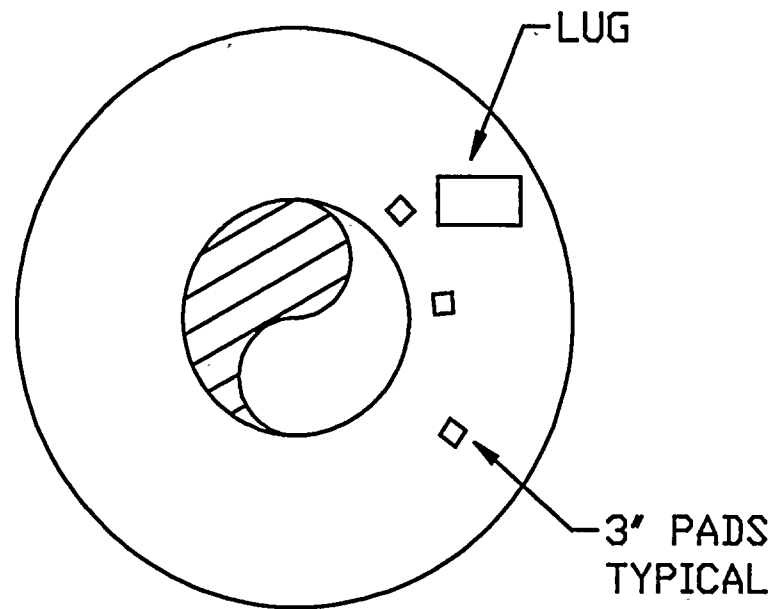
Catgy/ Item No.	Zone	Item	NDE Technique	Angle and Technique			Configuration or Limitations	Fig. No.	Comments / % Coverage
				1/2 V	Full V	1 1/2 V			
B-D B3.140	4-003	4-SGA-I-IRS 4-SGA-O-IRS	UT	45	-	-	Inner radius section, insulation brackets, support, and nozzle transition area limit exams	94-4-1	70% coverage achieved in two directions
B-F B5.70	4-007	31"-RCS-1401-5	UT	45	-	-	Steam generator nozzle to elbow	94-4-2	0% from the nozzle side, 75% from the elbow side
B-J B9.11	4-007	31"-RCS-1401-8	UT	45	-	-	Elbow to pipe, elbow and weld geometry	94-4-3	64% from the pipe side, 88% from the elbow side
B-J B9.11	4-007	31"-RCS-1401-10	UT	45	-	-	Elbow to reactor coolant pump casing, elbow geometry and pump configuration	94-4-4	57% from the elbow side, 0% from the pump side
B-F B5.70	4-008	29"-RCS-1404-4	UT	45	-	-	Elbow to steam generator nozzle	94-4-5	74% from the elbow side, 0% from the nozzle side
B-J B9.31	4-008	29"-RCS-1404-18	UT	45 70	-	-	14" branch connection, weld configuration limits coverage	94-4-6	0% from the pipe side, 100% from the branch connection side
B-J B9.11	4-009	27.5"-RCS-1407-11	UT	45	-	-	Reactor coolant pump case to pipe, instrument nozzle near weld and pump and weld configuration	94-4-7	18% from the pump side, 41% from the pipe side
B-J B9.31	4-009	27.5"-RCS-1407-20	UT	45 70	-	-	10" branch connection, weld configuration limits coverage	94-4-8	92% from the nozzle side, 0% from the main loop pipe side
B-J B9.31	4-011	29"-RCS-1405-21	UT	45 70	-	-	12" branch connection, weld configuration limits coverage	94-4-9	75% branch connection side, 0% from the pipe side
B-J B9.31	4-012	27.5"-RCS-1406-18	UT	45 70	-	-	10" branch connection, weld configuration limits coverage	94-4-10	100% from the nozzle side, 0% from the main loop pipe side

Catgy/ Item No.	Zone	Item	NDE Technique	Angle and Technique			Configuration or Limitations	Fig. No.	Comments / % Coverage
				1/2 V	Full V	1 1/2 V			
B-J B9.31	4-015	27.5"-RCS-1409-16	UT	45 60	-	-	4" branch connection, weld configuration limits coverage	94-4-11	100% from the nozzle side, 0% from the main loop pipe side
B-J B9.31	4-015	27.5"-RCS-1409-17	UT	45 70	-	-	10" branch connection, weld configuration limits coverage	94-4-12	100% from the nozzle side, 0% from the main loop pipe side
B-J B9.11	4-036	14"-RHR-1401-1	UT	45 60	-	-	Branch connection to elbow	94-4-13	70% from the elbow side, 35% from the branch connection side
B-J B9.11	4-036	14"-RHR-1401-5	UT	45 60	-	-	Pipe to valve, weld configuration	94-4-14	100% from the pipe side, 0% from the valve side
B-J B9.11	4-036	14"-RHR-1401-6	UT	45 60	-	-	Valve to pipe, weld configuration	94-4-15	100% from the pipe side, 0% from the valve side
B-J B9.11	4-036	14"-RHR-1401-9	UT	45 60	-	-	Elbow to pipe, weld configuration	94-4-16	53% from the pipe side, 54% from the elbow side
B-J B9.11	4-037	10"-SI-1401-14	UT	45 60	-	-	Valve to pipe	94-4-17	100% from the pipe side, 26% from the valve side
B-J B9.11	4-037	10"-SI-1401-18	UT	45 60	-	-	Pipe to branch connection	94-4-18	100% from the pipe side, 18% from the branch connection side



4-SGA-I-IRS

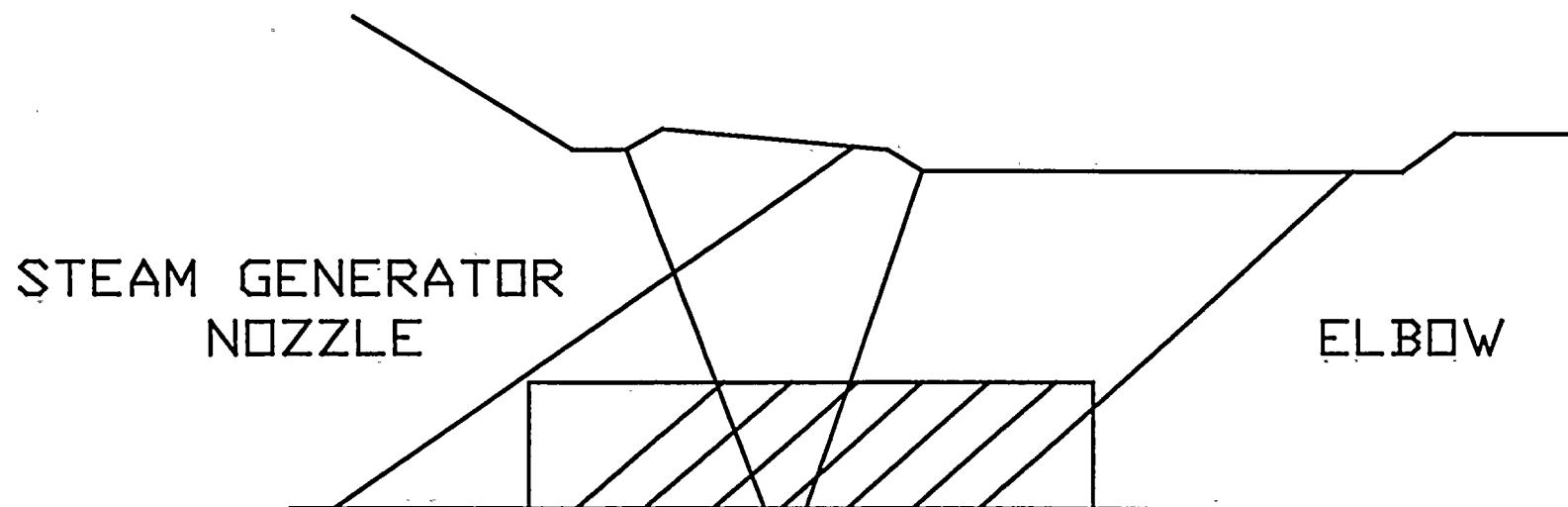
INLET NOZZLE INNER RADIUS



4-SGA-Q-IRS

OUTLET NOZZLE INNER RADIUS

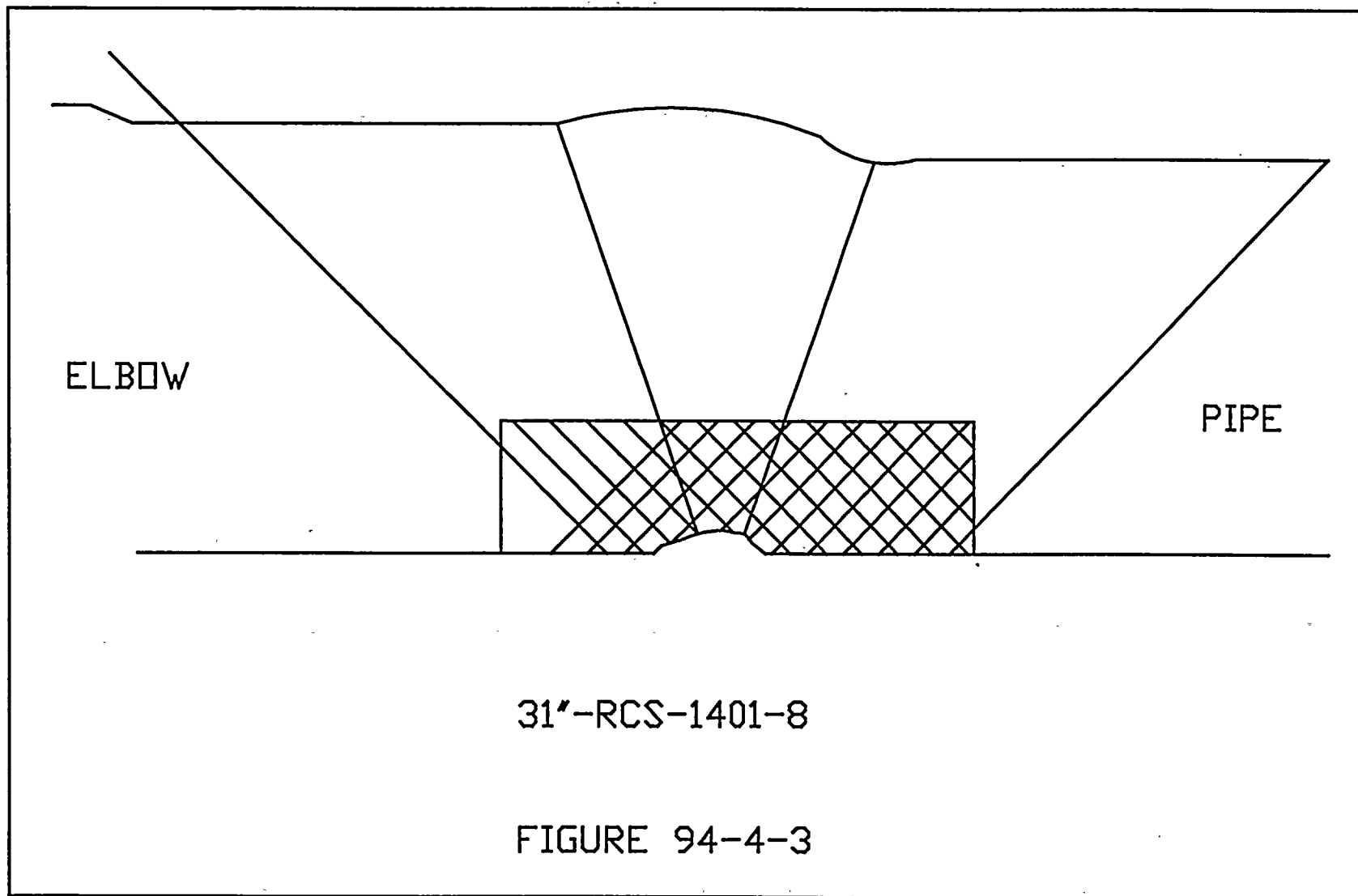
FIGURE 94-4-1



31"-RCS-1401-5

FIGURE 94-4-2





PUMP CASING

ELBOW

31"-RCS-1401-10

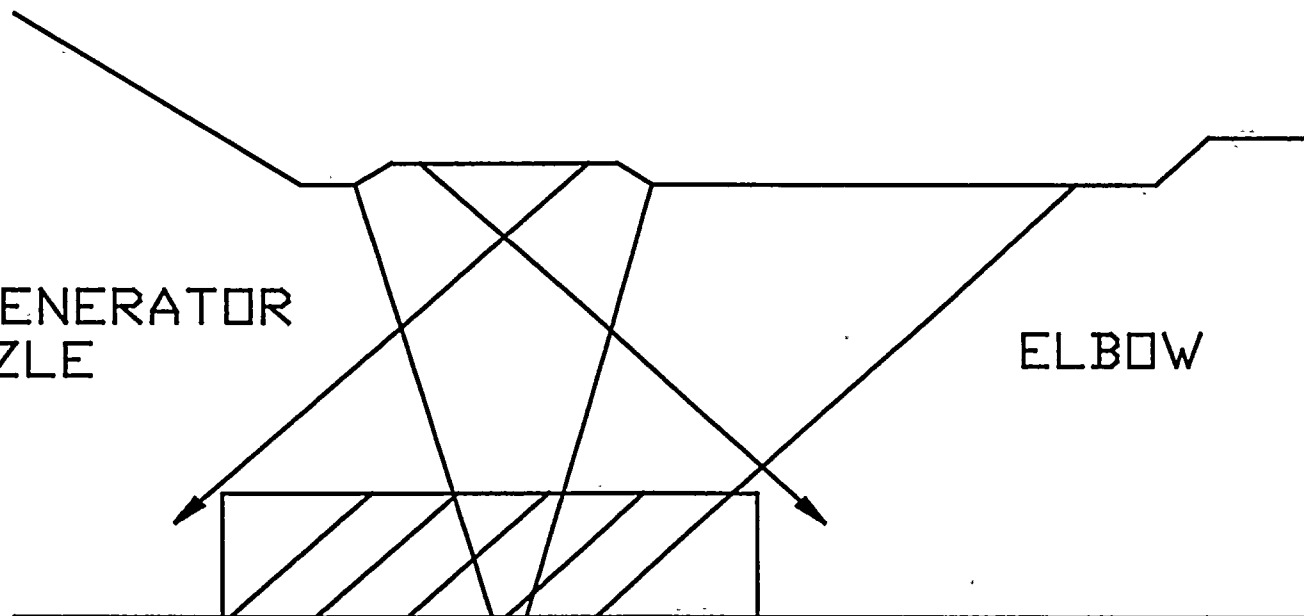
FIGURE 94-4-4

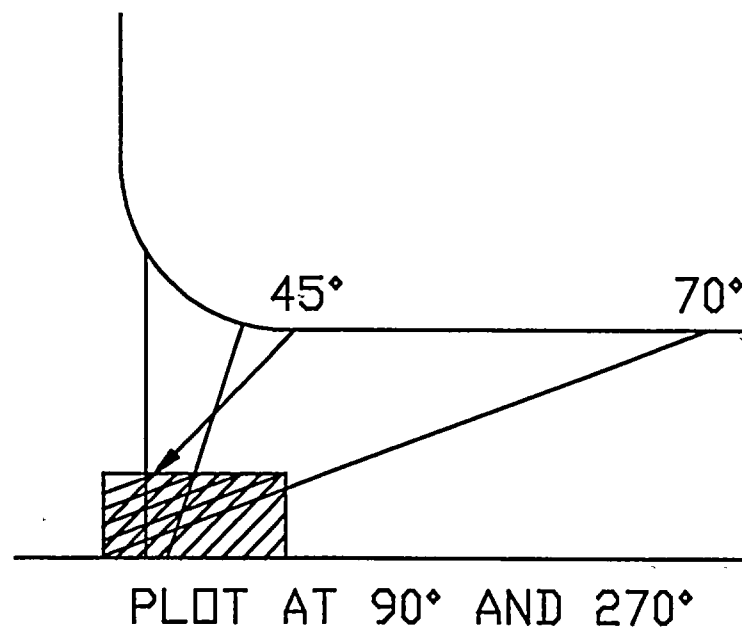
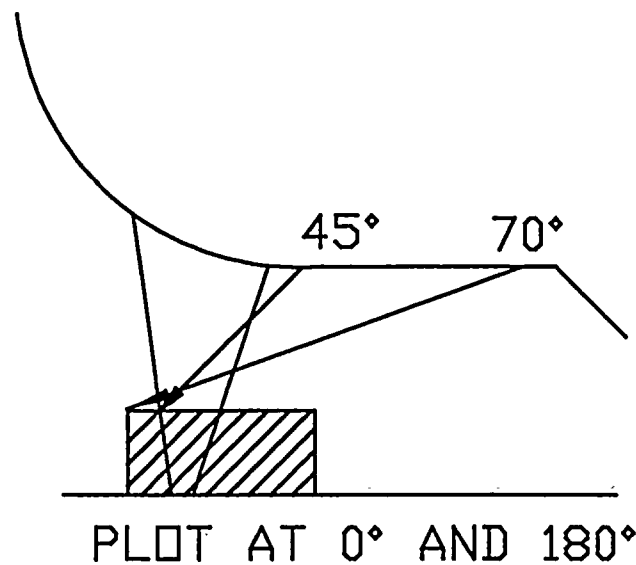
STEAM GENERATOR
NOZZLE

ELBOW

29"-RCS-1404-4

FIGURE 94-4-5





29'-RCS-1404-18

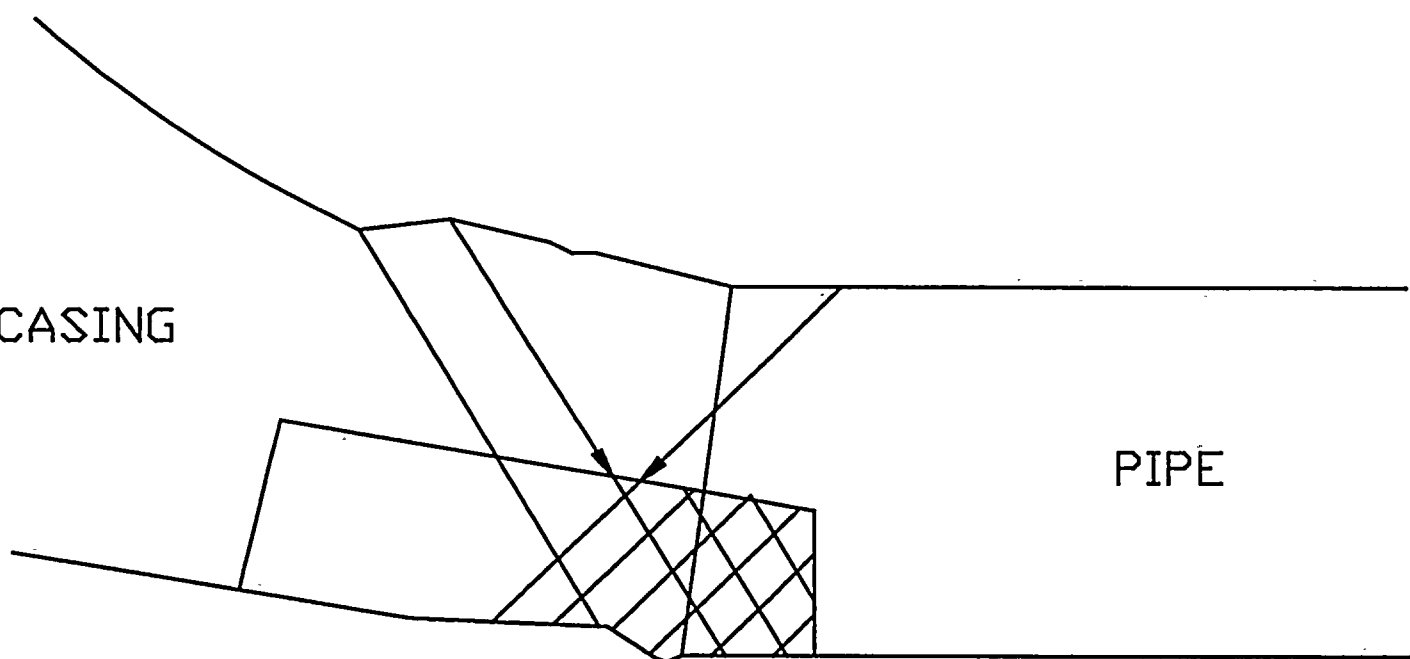
FIGURE 94-4-6

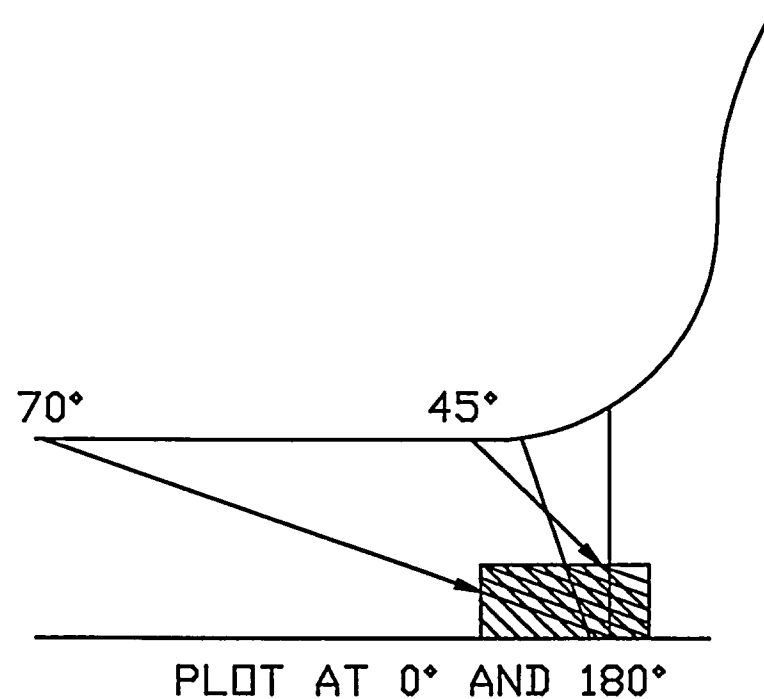
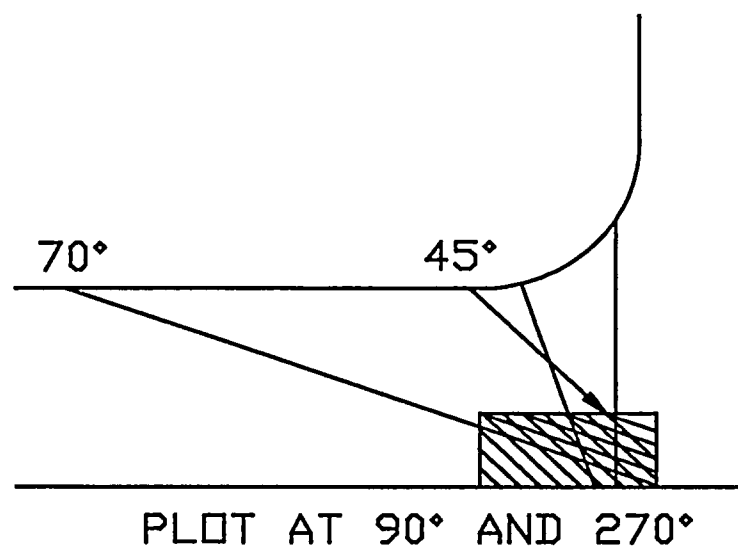
PUMP CASING

PIPE

27.5'-RCS-1407-11

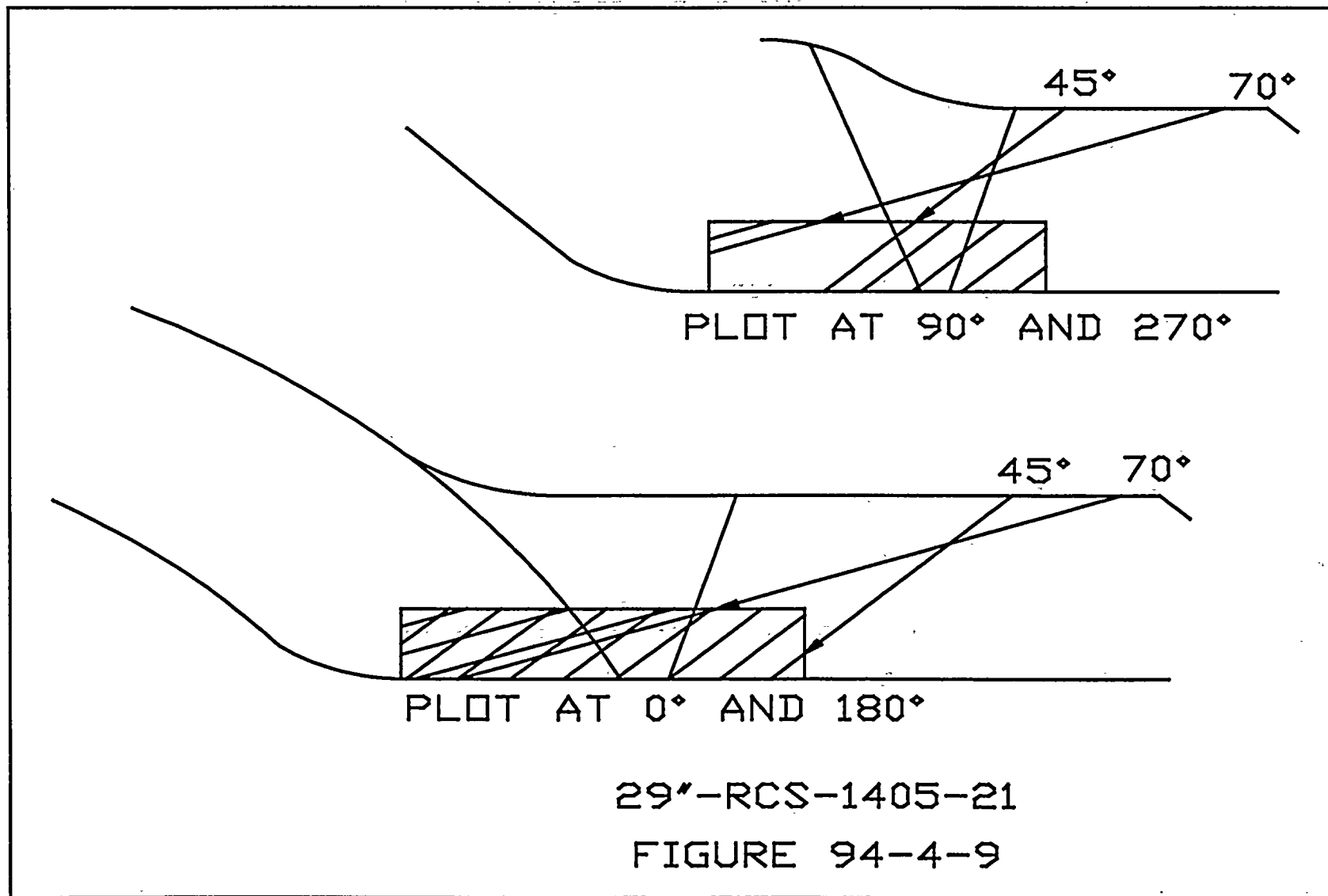
FIGURE 94-4-7

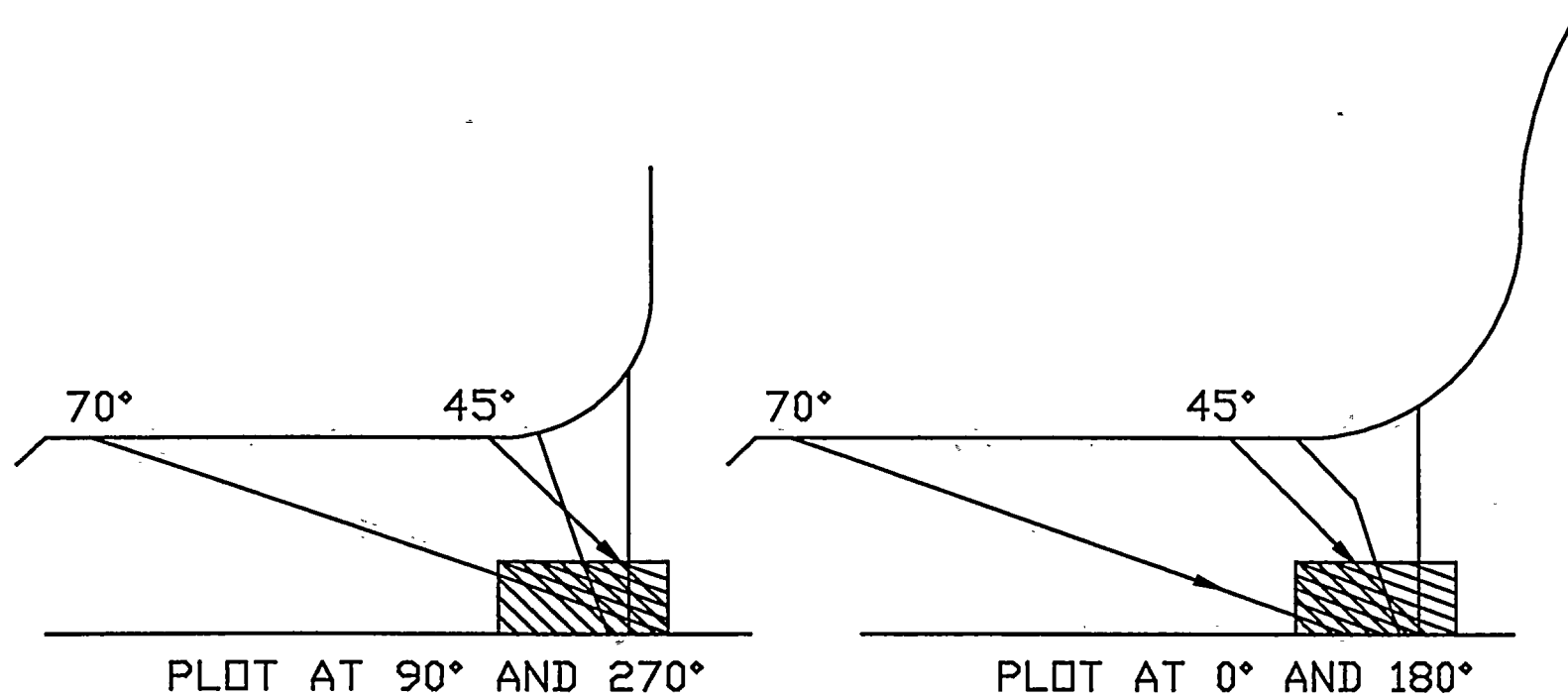




27.5'-RCS-1407-20

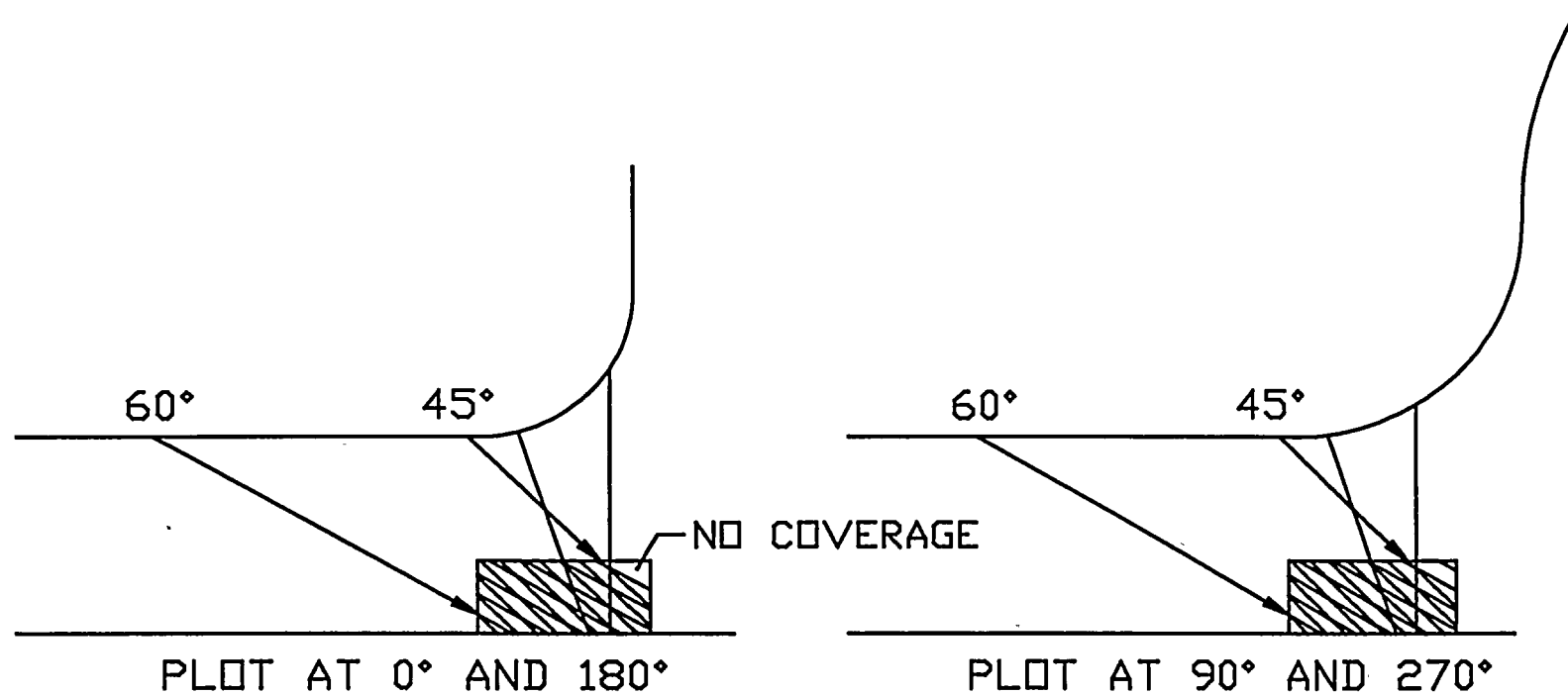
FIGURE 94-4-8





27.5'-RCS-1406-18

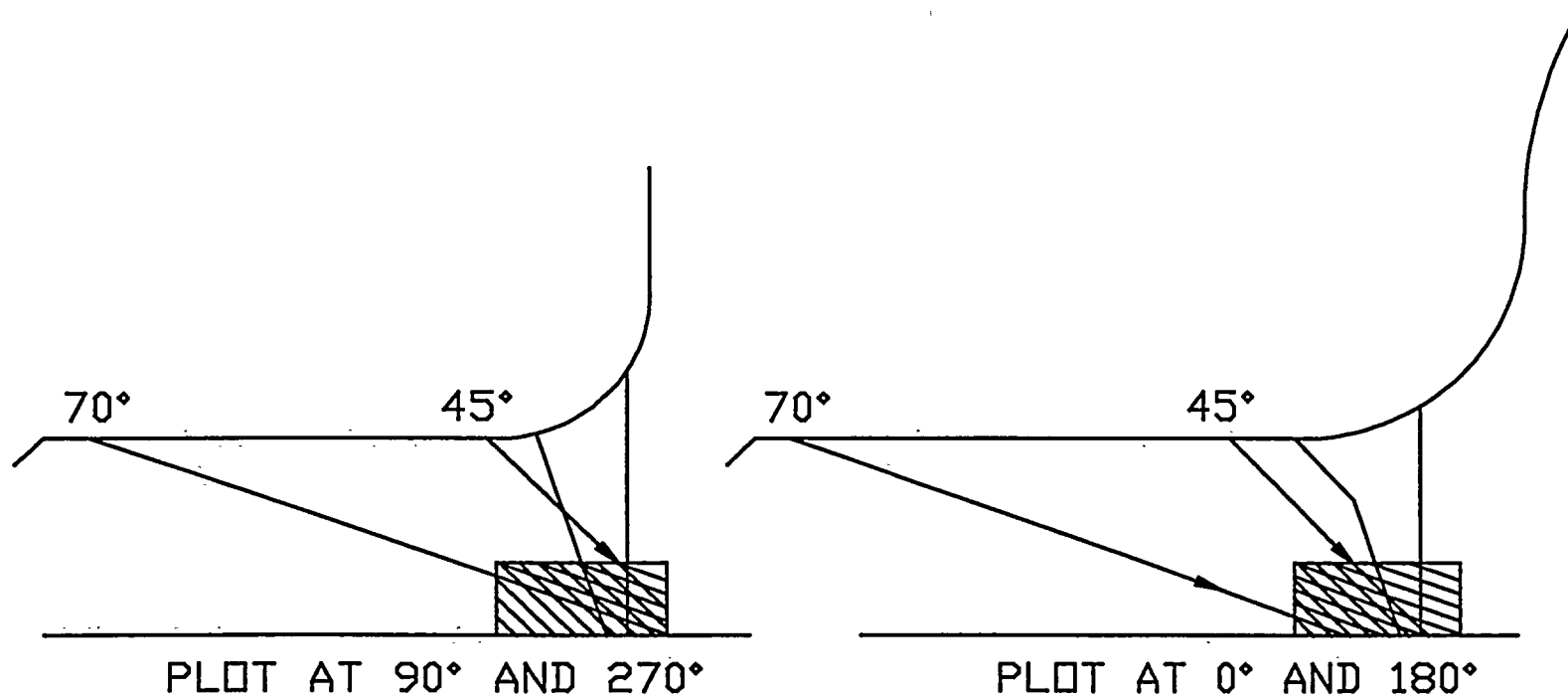
FIGURE 94-4-10



27.5'-RCS-1409-16

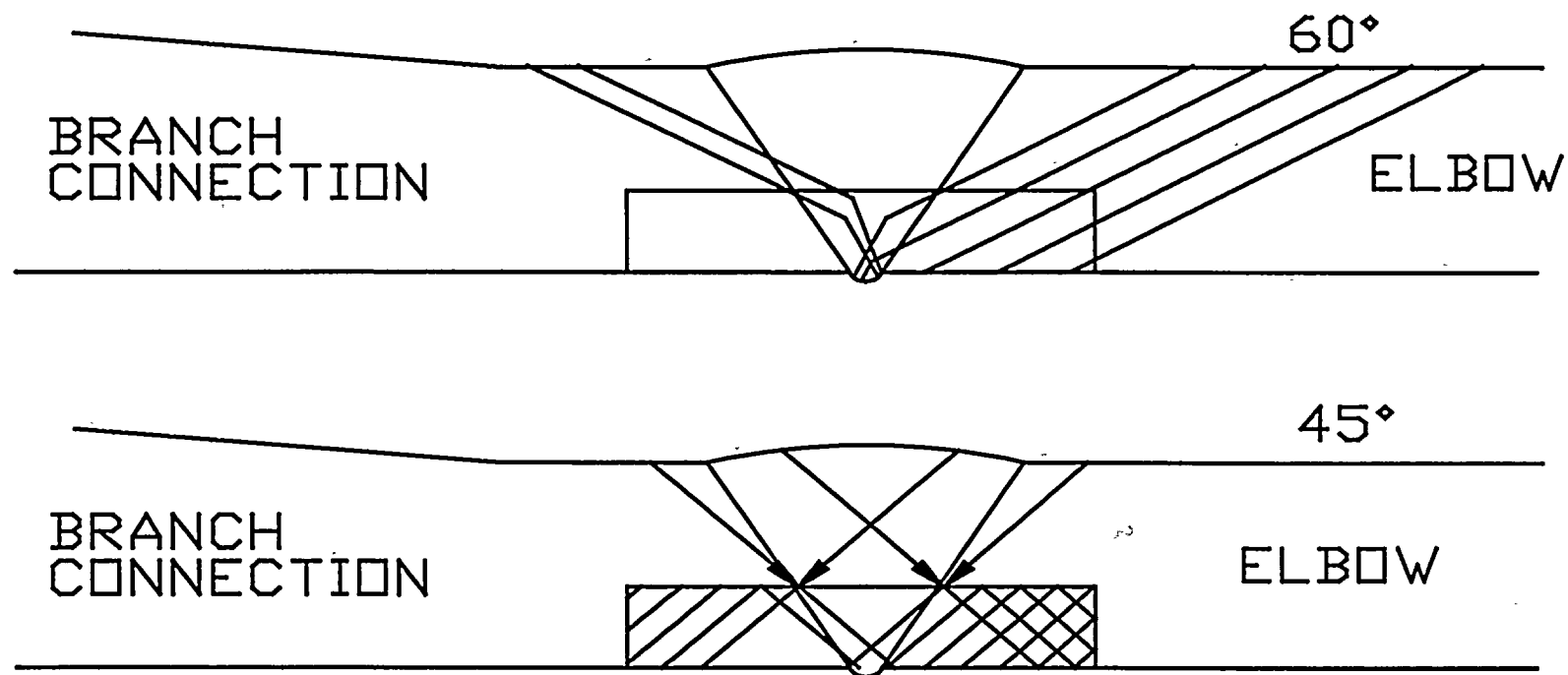
FIGURE 94-4-11





27.5'-RCS-1409-17

FIGURE 94-4-12



14"-RHR-1401-1

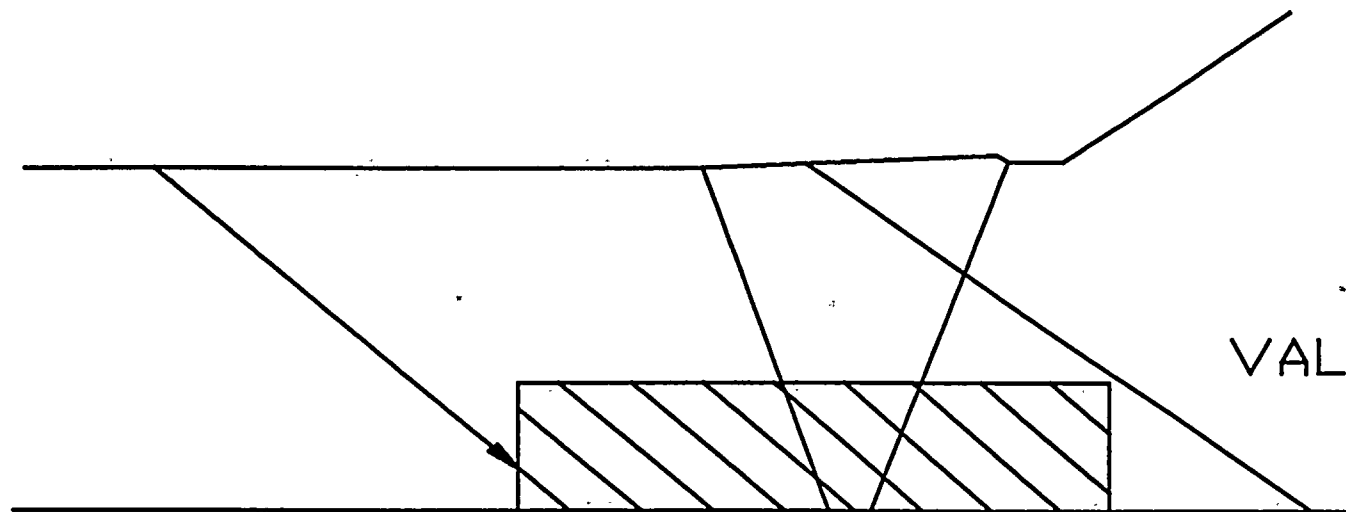
FIGURE 94-4-13

PIPE

VALVE

14"-RHR-1401-5

FIGURE 94-4-14

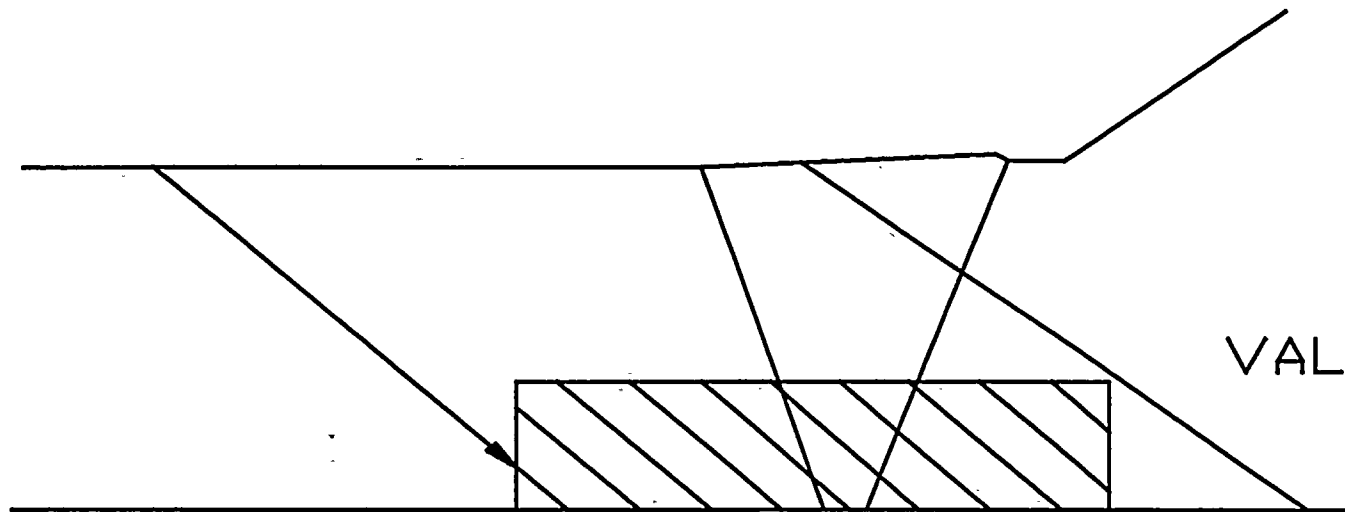


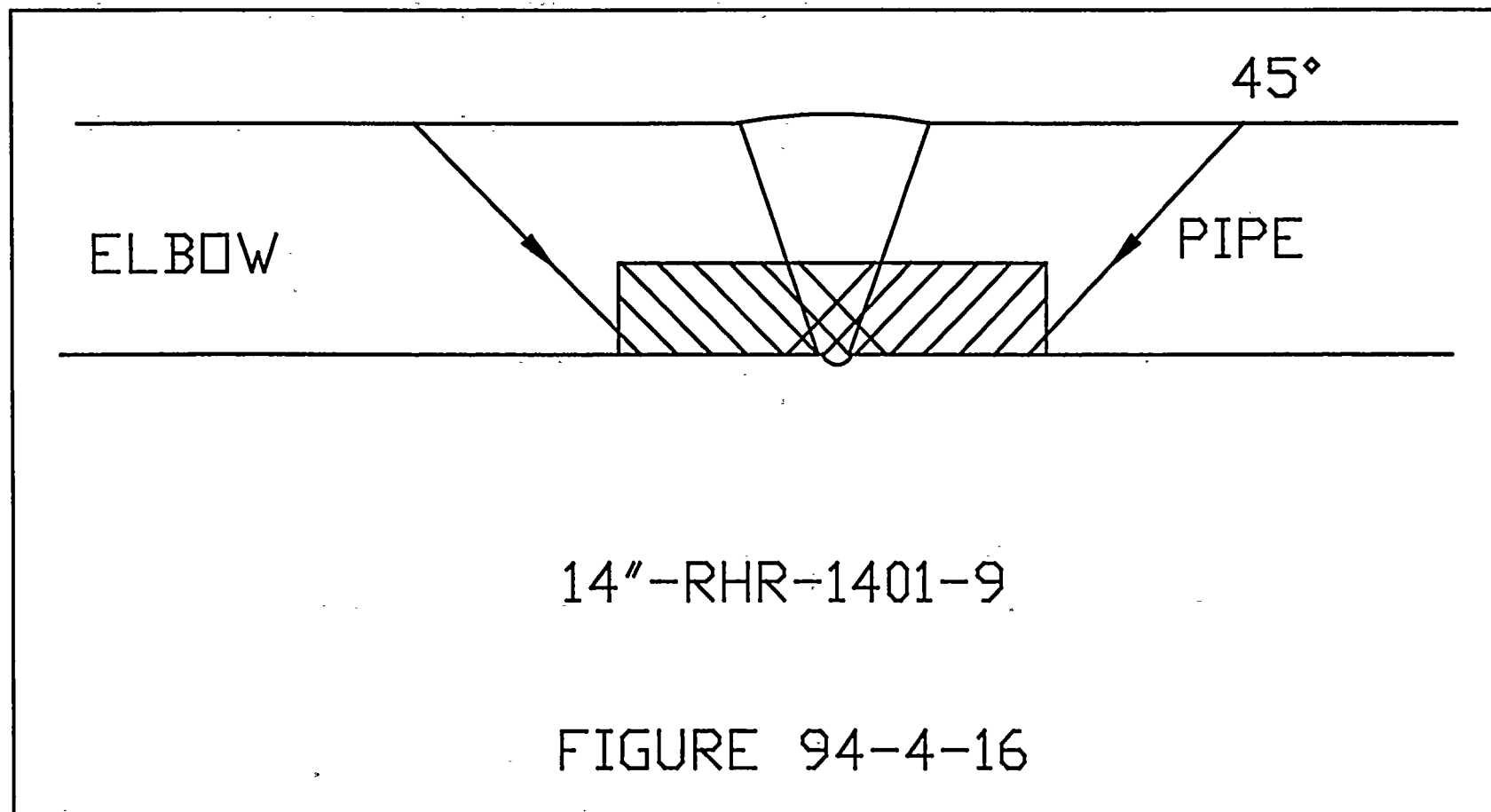
PIPE

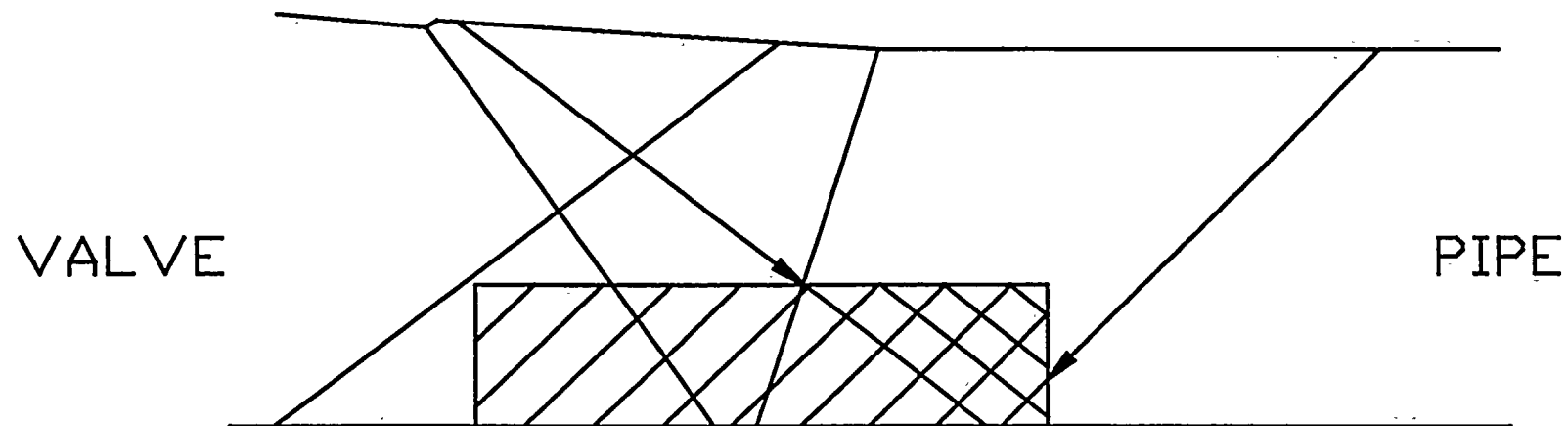
VALVE

14"-RHR-1401-6

FIGURE 94-4-15

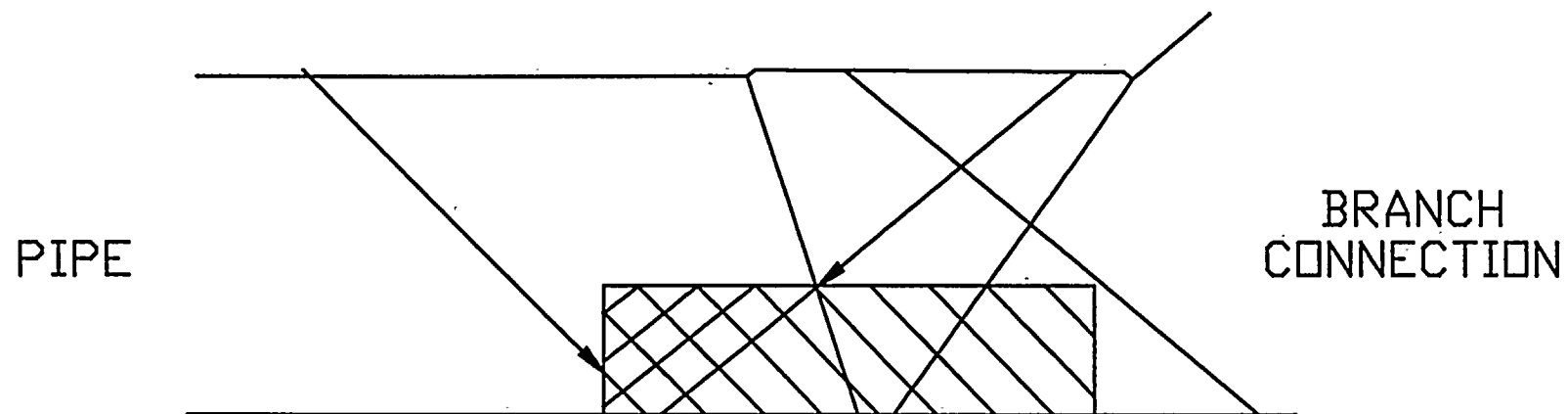






10"-SI-1401-14

FIGURE 94-4-17



10"-SI-1401-18

FIGURE 94-4-18

Attachment to
L-95-237
Page 54

**TURKEY POINT UNITS 3 AND 4
RELIEF REQUEST NO. 16**

PRESSURE TESTS FOR REPAIRS/REPLACEMENTS

RELIEF REQUEST NO. 16

A. Component Identification:

Class 1, 2, and 3 Systems

B. Examination Requirements:

ASME Section XI, 1989 Edition

IWA-4700 PRESSURE TEST

(a) After repairs by welding on the pressure retaining boundary, a system hydrostatic test shall be performed in accordance with IWA-5000.

C. Relief Requested:

Relief is requested from performing system hydrostatic tests following welded repairs or replacements.

Relief is requested from performing the system hydrostatic tests on the Turkey Point Unit 4 steam generator nozzle to reducer weld joints as committed to in FPL letter L-93-139, dated May 17, 1993.

D. Basis for Relief:

Hydrostatic tests result in hardships without a compensating increase in the level of safety and quality. Their purpose is to enhance leak detection. Industry experience has demonstrated that leaks are not being discovered as a result of hydrostatic test pressures propagating a pre-existing flaw through wall. Most leaks are being found when the system is at normal operating pressure. Hydrostatic tests are time consuming, require extensive operator support, and usually mean radiation exposure to personnel. Often additional equipment must be brought in to test a localized repair/replacement, which may involve additional exposure and expense. In many cases, a system hydrostatic test must be conducted over large parts of the system.

Code hydrostatic tests subject the piping system to a small increase in pressure over the nominal operating pressure and is not intended to present a significant challenge to pressure boundary integrity. It is used primarily as a means to enhance leak detection during the examination of

components under pressure, rather than as a measure to determine the structural integrity of components.

Monthly walkdowns by system engineers are performed on Class 2 systems outside containment to check for leakage, piping configuration, and/or damage. During outages, system engineers walk down Class 1, Class 2, and Class 3 systems inside containment. This walkdown is performed to look for system anomalies which could effect plant performance.

Hydrostatic tests place a burden on the systems, increase radiation exposure and costs, require significant setup time, and add marginal value (if any) to the repair or replacement quality. These tests result in hardships without a compensating increase in the level of quality and safety. Performing the tests in accordance with the proposed alternative will provide reasonable assurance that flaws will be discovered.

E. Alternative Examinations:

In lieu of the Code required hydrostatic testing for repairs and replacements and the steam generator reducer welds, FPL will use the alternative rules of ASME Code Case N-416-1. The following examination requirements will be used:

- a. NDE be performed in accordance with the methods and acceptance criteria of the 1992 Edition of Section III;
- b. Visual examinations (VT-2) will be performed in conjunction with a system leakage test using the 1989 Edition of Section XI, in accordance with IWA-5000, at nominal operating pressure;
- c. The use of the Code Case will be documented on the NIS-2 or equivalent, except for the steam generator reducer welds, which was submitted to the NRC (FPL letter L-93-139, dated May 17, 1993).

FPL will comply with the requirements of the Code Case with the following exception:

FPL will perform VT-2 examinations using the requirements of the 1989 Edition of Section XI instead of the 1992 Edition as specified in Code Case N-416-1. FPL's current ISI Program meets the 1989 Edition of Section XI and has proven effective at finding leaks. The 1992 Edition of Section XI would require the creation and maintenance of a separate VT-2 program, and would not be cost effective.

Attachment to
L-95-237
Page 57

F. Implementation Schedule:

Third Inspection Interval for Turkey Point Units 3 and 4.

G. Attachments:

None

Attachment to
L-95-237
Page 58

**TURKEY POINT UNITS 3 AND 4
RELIEF REQUEST NO. 17**

CLASS 2 SCHEDULE

RELIEF REQUEST NO. 17

A. Component Identification:

Turkey Point Unit 4 Class 2 Steam Generator Nozzle to Shell
Weld and Inner Radius Section

Nozzle to Shell Weld 4-SGA-ST
Inner Radius Section 4-SGA-ST-IRS

B. Examination Requirements:

ASME Section XI, 1989 Edition

Category C-B, Pressure Retaining Nozzle Welds in Vessels

Item No. C2.21, Nozzles Without Reinforcing Plate in
Vessels $>1/2$ in. Nominal Thickness, Nozzle to Shell
(Head) Weld

Item No. C2.22, Nozzles Without Reinforcing Plate in
Vessels $>1/2$ in. Nominal Thickness, Nozzle Inside
Radius Section

Note (3) The nozzles selected initially for examination
shall be reexamined over the service lifetime of the
component.

C. Relief Requested:

Relief is requested from reexamining the initially selected
components over the service lifetime of the component
(nozzle to shell weld and inside radius section on the Steam
Generator Main Steam nozzle)

D. Basis for Relief:

On Steam Generator "C", the Upper Shell to Head weld is
scheduled for examination during the third period. Steam
Generator "A" Main Steam Nozzle is scheduled for examination
during the first period. These welds and inner radius
sections are required to be volumetrically examined once
each interval. This schedule is consistent with the
previous interval and Note (4) of Category C-A and Note (3)
of Category C-B. By scheduling the welds and inner radius
section on the same steam generator, FPL will reduce
radiation exposure and costs.

In order to examine the head to shell weld, scaffold must be built around the steam generator and insulation removed. This process is repeated for the steam nozzle examinations. Holding to the same schedule as previous intervals would require this work to be performed 2 times. Scheduling the examinations together on the same steam generator would save the radiation exposure and costs required for the majority of one of these examinations.

A review of 1995 Edition of Section XI shows that the Code Committee has recognized that Owners may not always be able to adhere to the strict scheduling requirements of the earlier Codes. The words "to the extent practical" were added to each Note. This would enable Owners to change to different Steam Generators if unanticipated problems were to occur or if significant reduction in costs and radiation exposure could be realized.

The proposed schedule for the examination of substitute nozzle to shell weld and the associated inside radius section complies with FPL's Turkey Point Relief Request No. 9, "Alternative Scheduling of Examinations."

E. Alternative Examinations:

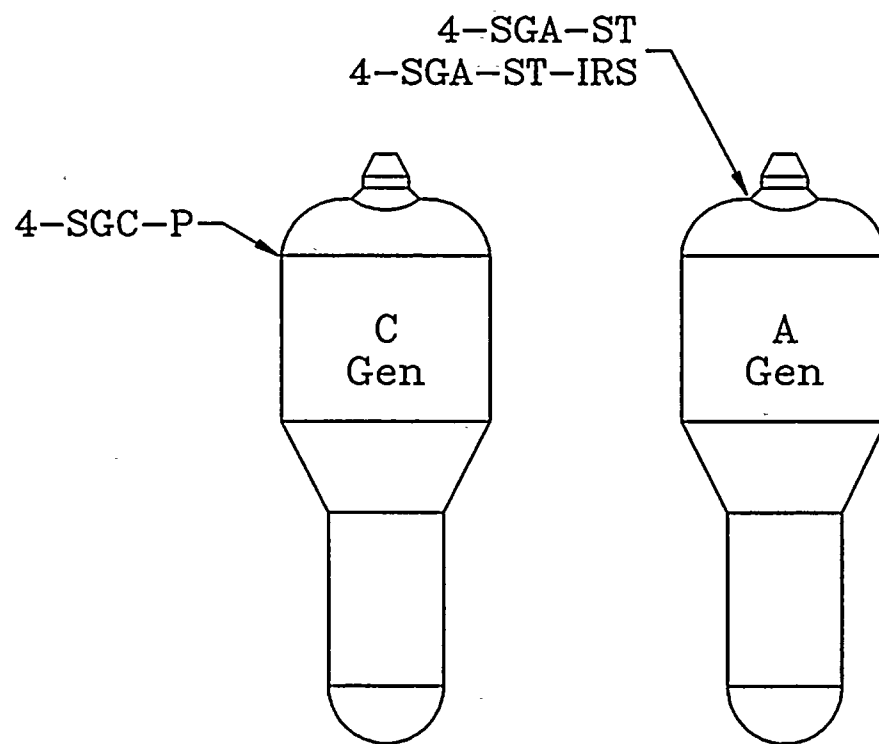
FPL will substitute the same Main Steam nozzle to shell weld and inner radius section on a different Steam Generator. The proposed schedule will be to examine the Nozzle to Shell weld and its Inside Radius Section on Steam Generator "C". The examinations will be scheduled in accordance with the attached tables.

F. Implementation Schedule:

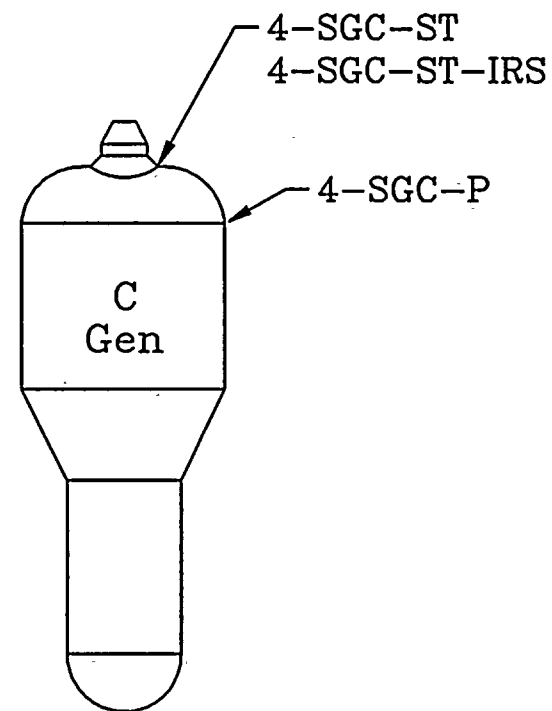
Third Inspection Interval.

G. Attachments:

Drawing showing current schedule and proposed schedule.



Currently
Scheduled
Welds



Proposed
Schedule

Unit 4, Category C-A

Zone Number	Weld Identification	Code Item Number	2nd Interval Examination	3rd Interval Schedule
4-060	4-SGA-Y	C1.30	1	1
4-060	4-SGA-N	C1.10	1	1
4-061	4-SGB-CL	C1.10	2	2
4-061	4-SGB-G	C1.10	2	2
4-062	4-SGC-P	C1.20	3	3
4-117	4-RHE-A1	C1.20	3	1
4-117	4-RHE-A2	C1.10	3	1

Note:

2 welds will be examined during an earlier period.
No welds will be examined during a later period.
5 welds will be examined during the same period as the second interval.

This proposed schedule moves examinations to earlier dates than was previously requested in FPL Turkey Point Relief Request No. 9.

Examination schedule:

	1st Per	2nd Per	3rd Per
SG Welds	2	2	1
RHE Welds	2	0	0
Total	4 = 57%	+2 = 85%	+1 = 100%

41 2 3



Unit 4, Category C-B

Zone Number	Weld Identification	Code Item Number	2nd Interval Examination	3rd Interval Schedule
4-061	4-SGB-FW	C2.21	2	2
4-061	4-SGB-FW-IRS	C2.22	2	2
4-062	4-SGC-ST	C2.21	Not Examined	3
4-062	4-SGC-ST-IRS	C2.22	Not Examined	3
4-117	4-RHE-A7	C2.31	2	1
4-117	4-RHE-A8	C2.31	2	1
4-117	4-RHE-A9	C2.31	3	1
4-117	4-RHE-A10	C2.31	3	1

Note: 4 welds will be examined during an earlier period.
No welds will be examined during a later period.
1 weld and IRS will be examined during the same period as the second interval.
1 new weld and IRS will be examined.

This proposed schedule is closer to Code requirements than was previously requested in FPL Turkey Point Relief Request No. 9.

4 1 2

1 2 3



Attachment to
L-95-237
Page 64

Examination schedule:

	1st Per	2nd Per	3rd Per
SG Welds	0	1	1
SG IRS	0	1	1
RHE Welds	4	0	0
RHE IRS	Will be examined if access to the inside surface becomes available.		
Total	4 = 50%	+2 = 75%	+2 = 100%

