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SUBJECT: Submits response to RAI re GL 92-01,Rev 1, "Reactor Vessel Structural Integrity."

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10 CFR 50, Appendix G

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555-0001

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Response to Request for Additional Information
Generic Letter 92-01, Revision 1,
Supplement 1, "Reactor Vessel Structural Integrity"

On May 19, 1995, the NRC issued Supplement 1 to Generic Letter (GL) 92-01, Revision 1, "Reactor Vessel Structural Integrity." The GL was issued to ensure that licensees have all the data relevant to the evaluation of reactor vessel structural integrity, and that all the relevant data is appropriately included in the assessments of compliance with regulatory requirements regarding reactor vessel integrity.

Item(3)of the GL supplement requested information which required that addressees provide a determination of the need for use of the ratio procedure in accordance with the established Position 2.1 of Regulatory Guide (RG) 1.99 Revision 2, for those licensees that use surveillance data to provide a basis for the Reactor Pressure Vessel (RPV) integrity evaluation. By letter L-95-290, dated November 16, 1995, FPL provided its response to Item 3 of the requested information, relative to Turkey Point Units 3 and 4. In response to Item 3, FPL stated that it did not use the surveillance data to provide a basis for the RPV integrity for Turkey Point Units 3 and 4, therefore, application of the ratio procedure was inappropriate. Also, FPL stated that there was no impact on the previously submitted evaluation of RPV integrity, or the LTOP and P-T limits in the Turkey Point Units 3 and 4 Technical Specifications.

On August 5, 1996, the NRC issued a closeout letter to GL 92-01, Revision 1, Supplement 1 for Turkey Point Units 3 and 4. In that letter, the NRC requested FPL to provide an assessment of the application of the ratio procedure, as described in Position 2.1 of RG 1.99, Revision 2 (May 1988), to Turkey Point Units 3 and 4 Pressure-Temperature (P/T) limit curves and Low Temperature Overpressure Protection (LTOP) limits.

Position 2.1 of RG 1.99, Revision 2 (May 1988) states, "if there is clear evidence that the copper or nickel contents of the surveillance weld differs from that of the vessel weld, measured values of ΔRT_{NDT} should be adjusted by multiplying them by the ratio of the chemistry factor for the vessel weld to that for the surveillance weld." The bulk copper composition for the critical reactor vessel material (SA 1101 weld metal) in both Turkey Point Units is 0.26% Cu and 0.60% Ni which corresponds to a chemistry factor of 180. The surveillance material for Turkey Point Unit 3(also SA 1101) contains 0.31% Cu and 0.57% Ni. The surveillance material for Turkey Point Unit 4 (SA 1094, a clone [same weld wire, different flux lot] of SA 1101) contains

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0.30% Cu and 0.60% Ni. The chemistry factor for both surveillance materials is 194.

Since the bulk vessel weld material has a lower chemistry factor than the surveillance material (the ratio of weld to surveillance is 180/194 = 0.93), the adjusted reference temperature as calculated using RG 1.99, Rev. 2 is lower when applying the ratio procedure. Therefore, the potential impact of using the ratio procedure to P/T limit curves and LTOP would have been a lower projected reference temperature and marginally less restrictive P/T limit curves and LTOP setpoints. Use of the ratio procedure would have been to the advantage of Turkey Point by reducing margin in the P/T limit curves but the chemistry values are not significantly different as to require its application.

Should there be any questions, please contact us.

Very truly yours,

R. J. Hovey
Vice President
Turkey Point Plant

OIH

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