

# CATEGORY 1

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 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251  
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SUBJECT: Requests approval to incorporate Code Case N-533, Alternative Requirements for VT-2 Visual Exam of Class 1, for use in Units 3 & 4 10-Yr ISI program.

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L-97-073  
10 CFR 50.55a

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 Inspection Program  
Third Ten Year Summary  
ASME Code Case N-533 - Request for Use

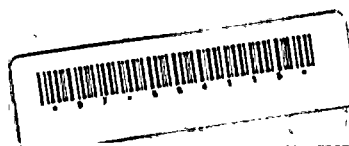
Pursuant to 10 CFR 50.55a, (Footnote 6) and 10 CFR 50.55a(a) (3), Florida Power and Light Company (FPL) requests approval to incorporate Code Case N-533, *Alternative Requirements for VT-2 Visual Examination of Class 1 Insulated Pressure-Retaining Bolted Connections, Section XI, Division 1*, for use in the Turkey Point Units 3 and 4 Ten Year Inservice Inspection Program. Code Case N-533 was approved for use by ASME on March 14, 1995.

Code Case N-533 is an alternative to the requirements of IWA-5242(a) of the 1989 Edition of the ASME Code which requires insulation removal from Class 1 pressure-retaining bolted connections to perform VT-2 visual examinations. IWA-5242(a) requires insulation to be removed from pressure-retaining bolted connections for visual examination VT-2 in systems boroated for the purpose of controlling reactivity. FPL requested interim relief in ISI Relief Request 10 which was submitted by letter (L-95-076) dated April 6, 1995, and granted by NRC letter dated June 9, 1995. In part, the basis for Interim Relief 10 was to provide time to reduce the burden of the required examinations through the ASME Code process. ASME Code Committee endorsement of this Code Case accomplishes part of this burden reduction for Class 1 bolted connections.

The ambient conditions encountered during the removal of the blanket or suitcase insulation to gain access to the bolted connections in conjunction with the inspection and time required for restoration at normal operating pressure and temperature (NOP/NOT) for the reactor coolant system require heat stress work restrictions. Containment entries at NOP/NOT are physically demanding on personnel due to the adverse heat stress environment. Stay times for personnel in many areas are significantly less than one (1) hour and would require multiple containment entries to complete the examination activities. Ambient temperatures in several areas requiring inspection are in excess of 100 degrees F, with exposed piping approximating reactor coolant system temperatures. Personnel should not be exposed to such an adverse work environment unnecessarily without a compensating increase in the level of quality and safety. In some areas, FPL does not believe the VT-2 visual inspection can be performed safely and may likely result in serious personnel injury. Additionally, exposing adjacent safety related instrumentation to the uninsulated heat load and mechanical removal process is considered undesirable. Performing the VT-2 visual examination process using Code Case N-533 will accomplish the inspections and the insulation installation while maintaining personnel safety, inspection quality and minimizing potential damage to operating instrumentation.

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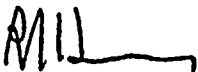
Historical data indicate that personnel contaminations increase with increasing environmental temperatures due to the profuse sweating caused by adverse environmental conditions. Working with contaminated insulating materials under these adverse conditions (i.e., to piping that is at 2250 psia and greater than 500 degrees F) would negatively impact total personnel contaminations and expose personnel to an unnecessary safety risk. Additionally, increased dose would be accumulated due to reduced examination efficiency as a result of the necessity to wear special protective equipment (e.g., ice vest).

Furthermore, the removal of scaffolding and ladders used for these examinations would be through the reactor containment building personnel hatch rather than the equipment hatch since the plant is in Mode 3 with the equipment hatch secured. This will place added physical and heat stress limitations on the personnel involved.

Each refueling outage, FPL will remove the insulation from the bolted connections in Class 1 systems and perform a VT-2 visual examination in accordance with paragraph (b) of the Code Case. The connections are not required to be pressurized during the visual examination and any evidence of leakage will be evaluated in accordance with IWA-5250. In addition to the requirements of paragraph (a) of the Code Case, the system pressure test and VT-2 visual examination with insulation installed on bolted joints at normal operating pressure and temperature (NOP/NOT) will include a 4-hour hold time and will be completed prior to returning the unit to service. This test and examination philosophy is consistent with the Inservice Inspection (ISI) Plan which was in place during the second ISI interval. These examinations, in conjunction with routine monitoring of reactor coolant system (RCS) leakage, will provide adequate assurance of RCS integrity. The personnel hazard imposed by the examination of hot, uninsulated components and subsequent insulation re-installation is not commensurate with the marginal contribution to safety. A copy of the Code Case is attached for your information.

Code Case approval is requested by March 28, 1997, to support the current Turkey Point Unit 3 refueling outage (TP3-16), avoid unnecessary cycling of the unit (cooldown to Mode 5), and avoid additional personnel exposure. Please contact us if there are any questions about this submittal.

Very truly yours,



R. J. Hovey  
Vice President  
Turkey Point Plant

RJH/OIH

Attachment

cc: Luis A. Reyes, Regional Administrator, Region II, USNRC  
Senior Resident Inspector, USNRC, Turkey Point Plant

CASES OF ASME BOILER AND PRESSURE VESSEL CODE .

Approval Date: March 14, 1995

*See Numerical Index for expiration,  
and any reaffirmation dates.*

Case N-533

Alternative Requirements for VT-2 Visual  
Examination of Class 1 Insulated Pressure-  
Retaining Bolted Connections  
Section XI, Division 1

*Inquiry:* What alternative requirements may be used in lieu of those of IWA-5242(a) to remove insulation from Class 1 pressure-retaining bolted connections to perform a VT-2 visual examination?

*Reply:* It is the opinion of the Committee that, as an alternative to the requirements of IWA-5242(a) to remove insulation from Class 1 pressure-retaining bolted connections to perform a VT-2 visual examination, the following requirements shall be met.

(a) A system pressure test and VT-2 visual examination shall be performed each refueling outage without removal of insulation.

(b) Each refueling outage the insulation shall be removed from the bolted connection, and a VT-2 visual examination shall be performed. The connection is not required to be pressurized. Any evidence of leakage shall be evaluated in accordance with IWA-5250.



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