

REGION II  
ATLANTA, GEORGIA



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May 12, 1983  
L-83-299

Mr. James P. O'Reilly  
Regional Administrator, Region II  
U. S. Nuclear Regulatory Commission  
101 Marietta Street, Suite 3100  
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: Turkey Point Units 3 & 4  
Docket Nos. 50-250 and 50-251  
I. E. Inspection Report 83-07

Florida Power & Light Company has reviewed the subject inspection report and a response is attached.

There is no proprietary information in the report.

Very truly yours,

Robert E. Uhrig  
Vice President  
Advanced Systems & Technology

REU/PLP/js

Attachment

cc: Harold F. Reis, Esquire  
PNS-LI-83-

8306290345 830616  
PDR ADOCK 05000250  
Q PDR

TURKEY POINT UNITS 3 & 4  
DOCKET NOS. 50-250 & 50-251  
IE INSPECTION 83-07

Finding:

10 CFR 50.55a(g) requires that inservice testing, to verify operational readiness, of pumps and valves whose function is required for safety, be accomplished in accordance with Section XI of the ASME B and PV Code, Section XI, 1974 edition through Summer 1975 addenda, and 1980 edition through Winter 1980 addenda, have been identified as the applicable codes for inservice testing. ASME B and PV Code, Section XI, Paragraph IWV-3300, requires valves, with remote position indicators, be observed at least every two years, to verify that the valve operation is accurately indicated. The above requirements were confirmed by ASME Interpretation XI-179-18 dated December 12, 1979.

10 CFR 50.55a(g) further requires that inservice inspection, to verify operational readiness, of components which are part of the reactor coolant pressure boundary, be accomplished in accordance with ASME B and PV Section XI. ASME B and PV Code, Section XI, 1974 edition with addenda through Summer 1975, has been identified as the applicable code for inservice inspection. ASME B and PV Code, Section XI, tables IVB-2500 B-F, and IWB-2600 B4.1 require in part, surface examination of welds and at least one wall thickness of adjacent base material. Turkey Point Inservice Inspection "Examination Plan and Schedule" dated December 16, 1982, requires in part, liquid penetrant examination of welds 29"-RC-3-4 (Item No. 000216) and 31"-RC-3-5 (Item No. 00217). The above examination is required to be accomplished in accordance with FPL procedure NDE-3.1, IWB-2500 B-F and IWB-2600 B4.1.

Contrary to the above, inservice testing of pumps and valves and inservice inspection of components were not accomplished in accordance with ASME B and PV Code, Section XI in that the following was noted:

1. FPL pump and valve inservice test program did not address the requirements of IWV-3300.
2. FPL has not provided a procedure to perform the observations required by IWV-3300.

Response: Turkey Point Unit 3

1. FPL concurs with the finding as it applies to Turkey Point Unit 3.
2. The circumstances which brought about the finding occurred when the Inservice Valve Test Program was updated to the 1980 edition of ASME Section XI Code. There was a change in IWV-3300 which applied to all valves with remote position indicators (i.e., both accessible and inaccessible), which was overlooked by FPL.
3. The Inservice Valve Test Program has been revised to provide for valve position indicator verification for all valves with remote position indication (i.e., accessible and inaccessible). The revised program will be submitted to the NRC by June 30, 1983.

4. Future corrective action is an infrequent event (i.e., every 10 years). Therefore, FPL will be more attentive to Code changes and interpretations as they affect the test program.
5. Full compliance to the program including procedures will be achieved prior to the next refueling outage scheduled for October 1983.

Response: Turkey Point Unit 4

1. FPL does not concur with the finding as it applies to Turkey Point Unit 4.
2. FPL does not agree for the following reasons:
  - a) ASME 1974 Edition thru Summer 1975 Addenda, IWV-3300 pertains to valves which are inaccessible during plant operation.
  - b) FPL Valve Test Program has no valves identified as inaccessible. Therefore, no procedures were required.
  - c) FPL received an interim letter of approval of the test program from NRC on September 7, 1977.
  - d) A later Code edition removed the word inaccessible and made the requirement apply to all valves with remote position indicators.

Item 3

FPL Procedure NDE 3.1 Revision 3, "Liquid Penetrant Examination Visible Dye Technique" states in part: "The examination area for circumferential and longitudinal welds shall be the weld and adjacent base material for a distance of 1 inch on each side of the weld fusion line". NDE 3.1, revision 3 is inadequate in that it is not consistent with ASME Section XI, IWB-2500 B-F for welds thicker than one inch, and resulted in the misinspection of reactor coolant system welds 31"-RC-3-5 and 29"-RC-3-4 whose wall thickness exceeds two inches.

Response

1. FPL concurs with the finding.
2. The FPL individual inadvertently utilized portions of the Federal Regulations later endorsed Code without requesting a relief from the Code requirements as provided by 10 CFR 50.55a(g)(iv).

3. FPL will request a relief from the Code requirement. FPL does not plan to reexamine these welds pending followup action to be taken on this item since we are still in the first inspection interval.
4. Future corrective action will consist of the following:
  - a) Documenting all relief requests pertaining to the applicable Code at the start of the Inspection Interval.
  - b) Instruct FPL individuals engaged in Inservice Inspection work that a relief from Code is a requirement.
5. Implementation will be achieved prior to the termination of this Inspection Interval.