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

Turkey Point Units 3
Docket Nos. 50-250

Commitment Revision Summary One Time Deferral of MOV Static Periodic Verification Testing

References:

1. NRC Safety Evaluation of Licensee Response to Generic Letter 96-05, Turkey Point Plant, Unit Nos 3 and 4, dated June 29, 2000.
2. NEI Guidance 99-04, NEI 99-04, Guidelines for Managing NRC Commitments
3. Turkey Point Condition Report (AR) 02404311

In response to Generic Letter (GL) 96-05, Turkey Point committed to implement the Joint Owners Group (JOG) periodic verification plans, Reference 1. The periodic motor operated valve (MOV) static verification test ensures that age related degradation has not caused a significant decrease in motor-operator capability or increase in operating requirements that could jeopardize the MOV's ability to perform their safety function and as such is a requirement of the MOV Program.

The purpose of this letter is to summarize the Turkey Point Unit 3 commitment revision related to the one-time deferral of the MOV Static Periodic Verification Testing for six motor that are in the scope of the GL 96-05 program. These MOVs are tested at assigned intervals to periodically verify design-basis capability with regards to valve operating requirements. The one-time deferral of the static periodic verification testing will revise the programmatic commitment as follows:

1. **MOV-3-750, Residual Heat Removal (RHR) inlet valve from RCS.** MOV-3-750 is a JOG Class B valve. For Class B valves, the JOG program specifies that the static diagnostic test matrix be followed based on functional margin and risk categorization of the specific MOV. This valve is considered low risk based on the most recent Turkey Point MOV Risk Ranking and the expert panel determination. Accordingly, for MOV-3-750, the current Turkey Point commitment following the JOG verification plans, is to perform the maximum Periodic Verification Test (PVT) at an interval of 10 years. The last static test of MOV-3-750 was performed on October 2012 which confirmed the MOV has high margin. The proposed commitment change is a one-time deferral of the static periodic verification test for MOV-3-751 by six months or until the end of the next Unit 3 refueling outage, which is currently scheduled for April 2023.
2. **MOV-3-862B MOV, Stop Valve on RHR Suction Header.** MOV-3-862B is a JOG Class A valve. For Class A valves, that have positive functional capability margin, the JOG program assumes that these valves have High Margin in the static diagnostic test matrix with a test interval of 6 years for High Risk valves and 10 years for the Medium and Low Risk valves. Based on the most recent Turkey Point MOV Risk Ranking and expert panel, this MOV is considered a low risk valve. The last static periodic verification test was performed in April 2012 which confirmed the MOV has high margin. The proposed change is one-time deferral of the static periodic verification test for MOV-3-862B by approximately one year or until the end of the next refueling outage, which is currently scheduled for April 2023.

3. **MOV-3-1407, Steam Generator A Feedwater Flow Control Valve Inlet Isolation MOV.** MOV-3-1407 is a JOG Class B valve. For Class B valves, the JOG program specifies that the static diagnostic test matrix be followed based on functional margin and risk categorization of the specific MOV. This valve is considered low risk based on the most recent Turkey Point MOV Risk Ranking and the expert panel determination. The last static periodic verification testing on MOV-3-107 was performed in July of 2012 which confirmed the MOV had high margin. The proposed change is one-time deferral of the static periodic verification test for MOV-3-1407 by approximately 9 months or until the end of the next refueling outage, which is currently scheduled for April 2023.
4. **MOV-3-1408, Steam Generator B Feedwater Flow Control Valve Inlet Isolation MOV.** MOV-3-1407 is a JOG Class B valve. For Class B valves, the JOG program specifies that the static diagnostic test matrix be followed based on functional margin and risk categorization of the specific MOV. The valve is considered low risk based on the most recent Turkey Point MOV Risk Ranking and expert panel determination. The last test was performed on August 2012 which confirmed the MOV has high margin. The proposed change is one-time deferral of the static period verification test for MOV-3-1408 by approximately 8 months, or until the end of the next refueling outage, which is currently scheduled for April 2023.
5. **MOV-3-1426, Steam Generator B Sample Line Isolation MOV.** MOV-3-1426 is a JOG Class A valve. For Class A valves, that have positive functional capability margin, the JOG program assumes that these valves have High Margin in the static diagnostic test matrix with a test interval of 6 years for High Risk valves and 10 years for the Medium and Low Risk valves. Based on the results of the previous static verification test MOV-3-1426 has high margin. This valve is considered low risk based on the most recent Turkey Point MOV Risk Ranking and expert panel determination. The last test was performed on April of 2012. The proposed change is one-time deferral of the static period verification test for MOV-3-1426 by approximately 1 year, or until the end of the next refueling outage, which is currently scheduled for April 2023.
6. **MOV-3-1427, Steam Generator C Sample Line Isolation MOV.** MOV-3-1427 is a JOG Class A valve. For Class A valves, that have positive functional capability margin, the JOG program assumes that these valves have High Margin in the static diagnostic test matrix with a test interval of 6 years for High Risk valves and 10 years for the Medium and Low Risk valves. Based on the results of the previous static verification test MOV-3-1427 has high margin. This valve is considered low risk based on the most recent Turkey Point MOV Risk Ranking and expert panel determination. The last test was performed on May of 2012. The proposed change is one-time deferral of the static period verification test for MOV-3-1427 by approximately 11 months, or until the end of the next refueling outage, which is currently scheduled for April 2023.

The test deferral of these MOVs was due to Turkey Point Unit 3 Cycle 32 refueling outage scope changes for the extenuating circumstances associated the COVID-19 pandemic and availability of resources.

The Inservice stroke time test results provide reasonable assurance that these MOVs remain capable of performing their safety functions until the MOV static verification test can be performed during the next Turkey Point Unit 3, cycle 33 Refueling outage, currently scheduled to end by April 2023.

The commitment revision review was performed in accordance with the guidance provided in NEI 99-04, Guidelines for Managing NRC Commitments, Reference 2, and is documented in the Turkey Point Corrective Action Program, Reference 3. The justification for revising the commitment to defer for one time only the static verification test as indicated above is based on the review and evaluation of the performance of each of these valves and the presence of acceptable positive margin.

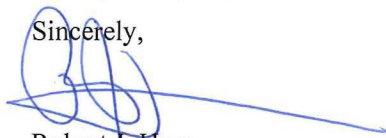
The evaluation included the review of other maintenance and testing activities such as the completion of scheduled stem lubrication, operator inspection PMs, the acceptability of Inservice test results, and the lack of any indication that the MOV's performance has degraded.

The MOV static periodic verification test has no effect on the MOV performance or its ability to perform its design functions as it provides data on the MOV's performance at the time of the test. This test is used to verify design-basis capability with regards to valve operating requirements and to identify any adverse performance trends or degradations. Preventative maintenance such as motor operator inspections and stem lube/grease inspections have been performed in the prescribed intervals. Continuous performance of the equipment reliability PMs and Inservice stroke time testing at the prescribed intervals provide a high degree of confidence with respect to the reliability of the subject MOVs.

The evaluation performed concluded that this one-time only deferral of the static periodic verification tests for these valves until the end of the next Turkey Point Unit 3 refueling outage for Cycle 33, does not adversely affect the ability of the MOVs to perform any of their safety related functions.

If you have any questions or require additional information, please contact Mr. Robert Hess, Licensing Manager, at (305) 246-4112.

Sincerely,

A handwritten signature in blue ink, appearing to read 'R. Hess', with a long horizontal line extending to the right.

Robert J. Hess
Licensing Manager
Turkey Point Nuclear Plant

cc: USNRC Regional Administrator, Region II
USNRC Project Manager, Turkey Point Nuclear Plant
USNRC Senior Resident Inspector, Turkey Point Nuclear Plant