

February 2, 2001

Mr. Thomas F. Plunkett
President - Nuclear Division
Florida Power & Light Company
P. O. Box 14000
Juno Beach, FL 33408-0420

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE
TURKEY POINT, UNITS 3 AND 4, LICENSE RENEWAL APPLICATION

Dear Mr. Plunkett:

By letter dated September 8, 2000, Florida Power and Light (FPL), submitted for the Nuclear Regulatory Commission's (NRC) review an application pursuant to 10 CFR Part 54, to renew the operating license for Turkey Point Nuclear Plant, Units 3 and 4. The NRC staff is reviewing the information contained in the license renewal application and has identified, in the enclosure, areas where additional information is needed to complete its safety review. Specifically, the enclosed questions relate to Section 2.1, "Scoping and Screening Methodology;" Section 2.3.1, "Reactor Coolant Systems;" Section 2.3.2.2, "Containment Spray;" Section 2.3.3.3, "Spent Fuel Pool Cooling;" Section 2.3.3.4, "Chemical and Volume Control;" Section 2.4.1, "Containments;" and Section 2.4.2.4, "Cooling Water Canals."

Please provide a schedule by letter, electronic mail, or telephonically for the submittal of your response within 30 days of the receipt of this letter. Additionally, the staff would be willing to meet with FPL prior to the submittal of the response to provide clarification of the staff's request for additional information.

Sincerely,

/RA/

Rajender Auluck, Senior Project Manager
License Renewal and Standardization Branch
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Docket Nos. 50-250 and 50-251

Enclosure: Request for Additional Information

cc w/encl: See next page

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REQUEST FOR ADDITIONAL INFORMATION
TURKEY POINT, UNITS 3 AND 4

Section 2.1

Scoping and Screening Methodology

RAI 2.1-1: In Section 2.1.1.2 of the LRA, the applicant states that the scope of systems, structures, and components include those with the capability to prevent or mitigate the consequences of accidents that could result in potential offsite exposure comparable to the guidelines in 10 CFR 100.11. In 64 FR 72002, December 23, 1999, Section 10 CFR 54.4 was amended by revising paragraph (a)(1)(iii), effective January 24, 2000, specifically to include §50.67(b)(2). The applicant should discuss any impacts in the LRA associated with this change.

RAI 2.1-2: In Section 2.1.1.3 of the LRA, the applicant states that although Turkey Point Units 3 and 4 were not originally licensed for “seismic II over I” (i.e., consistent with the seismic criteria and guidance in RG 1.29, “Seismic Design Classification”), that “seismic II over I” was nonetheless “considered” for license renewal scoping.

The staff’s position is that “seismic II over I” piping systems, structures, and components whose failure could prevent safety-related systems and structures from accomplishing their intended functions are within the scope of license renewal. However, the staff recognizes that the criteria defining the term “seismic II over I” is bound by the CLB for each facility.

Therefore, the applicant is requested to submit the definition of the “seismic II over I” criteria considered by the applicant in preparing the LRA for Turkey Point Units 3 and 4, and the bases for the application of such criteria to satisfy 10 CFR 54.4(a)(2) requirements, consistent with the CLB of the facility.

In addition, clarify whether the scope of the systems discussed in Chapter 3 of the LRA includes any “Seismic II over I” piping. If so, clarify how the aging management programs for those piping systems, including their supports, have been addressed. Specifically, state whether the same aging management programs discussed in tables included in LRA Section 3 also apply to those “Seismic II over I” piping components.

Section 16

Appendix A

RAI App. A.16-1: The applicant provides summary program descriptions in the FSAR Supplement (Appendix A to the LRA). The applicant should discuss why the program descriptions did not include a discussion on the 10 program attributes.

Section 2

Appendix B

RAI B.2-1: In Appendix B of the LRA, the applicant states that two aging management program attributes are covered by the Turkey Point quality assurance program, which was put into place to meet the requirements of 10 CFR Part 50, Appendix B. These two attributes are corrective actions and administrative controls. The draft Standard Review Plan for License Renewal dated August 2000, included a third attribute, a confirmation process, within the 10 CFR Part 50, Appendix B quality assurance program. For this program attribute, the applicant provides a

Enclosure

description in the individual programs that reference the corrective action program. Provide additional information on the confirmation process and how follow-up activities are determined and evaluated. Clarify how these activities are related to the corrective action program which is part of the broader quality assurance program.

Section 2.3.1 Reactor Coolant Systems

RAI 2.3.1 - 1: The LRA stated that the Turkey Point pressurizers are bounded by the description contained in the generic report WCAP-14574, "License Renewal Evaluation: Aging Management Evaluation for Pressurizers." WCAP-14574 determined that the pressurizer manway pad gasket seating surface requires aging management. However, the staff noted that the subject component was not identified in the LRA (Table 3.2-1) as requiring aging management. The staff, therefore, requests the applicant to include the subject component at Turkey Point within scope, and to submit an aging management program (AMP). The applicant should also verify whether the component is covered under the Boric Acid Wastage Surveillance Program to assure that these pressure boundary components do not fail prematurely due to accelerated rate of corrosion.

RAI 2.3.1 - 2: The staff noted that the LRA (Table 3.2-1) did not identify the SG primary and secondary side manway gasket seating surfaces as within the scope of license renewal. The staff requests the applicant to justify exclusion of these components, or to submit an AMP. The applicant should also verify whether the primary side manway gasket seating surface is covered under the Boric Acid Wastage Surveillance Program to assure that these pressure boundary components do not fail prematurely due to accelerated rate of corrosion.

Section 2.3.2.2 Containment Spray

RAI 2.3.2.2-1: In license renewal application (LRA) Table 3.3-2 for containment spray, containment spray pump seal water cyclone separators are included for internal environmental aging effects. Please indicate why these components are apparently omitted from the list for external environmental aging effects.

Section 2.3.3.3 Spent Fuel Pool Cooling

RAI 2.3.3.3-1: In Section B4 of drawings 3-SFP-01 and SFP-01, an SFP vortex diffuser is a passive long-live component. Its intended safety-related function is to protect the pump from being cavitated by air introduction into the suction side of the SRP cooling water pump. However, it is not included within the scope of license renewal nor is it identified as part of an AMR. Provide justification for its exclusion from the scope of license renewal.

Section 2.3.3.4 Chemical and Volume Control

RAI 2.3.3.4-1: In Section 4E and F of drawing O-CVCS-02, the LRA boundary of the relief and drain lines end in the middle of the piping section associated with the waste disposal system. The rest of the piping section and valves 1309C, 1310C, RV-1118A, 1125, and 1135C are not in scope of license renewal. Most function boundaries end at a valve or component and not in the middle of the pipe. Provide justification as to how the safety function is maintained when this piping section is not isolated by a valve or component at the current boundary. This configuration is similar for holdup tanks T207B and T207A piping and associated components.

Section 2.4.1

Containments

RAI 2.4.1-1: Section 2.4.1.1.1 of the LRA states that the containment exterior walls located below grade have embedded water-stops installed to inhibit the intrusion or seepage of groundwater. The waterproofing membrane and water-stops are piece parts and are not identified as the unique components within the scope of license renewal. The staff considers that the water-stops are important in maintaining the integrity of the components to which they are connected. The groundwater in-leakage into the concrete construction joints could occur as a result of degradation of the water-stops. Provide justification for why the water-stops are not considered within the scope of license renewal.

Ral 2.4.1-2: Section 2.4.1.1.1 of the LRA states that load-carrying capacity of the containment liner plate anchorages is required to support equipment, such as the polar crane. Verify if there are any other cranes or brackets that are supported by the containment liner. Name the components or load-carrying supports attached to the liner plate that are within the scope of license renewal.

RAI 2.4.1-3: Table 3.6-2 of the LRA lists containment personnel hatch, emergency escape hatch, and equipment hatch as the components within the scope of license renewal. Explain whether the hatch door interlock systems, equalizing valves, door seals, and operation mechanisms (such as gears, latches, hinges, linkages, etc.) are within the scope of license renewal. Discuss the components within these hatches that are subject to an AMR.

RAI 2.4.1-4: Section 2.4.1.2.2 of the LRA did not describe the structures of the reactor coolant system supports. Provide information on the structures of the reactor vessel support, steam generator support, pressurizer support, and coolant pump support and their boundaries in scope that are subject to an AMR.

RAI 2.4.1-5: Are the control rod drive service structures (which support the control rod drive mechanism) within the scope of license renewal? If so, please provide information on the control rod drive service assemblies (such as support, platform, service structure skirt, etc.) and identify the boundaries of the structural components that are subject to an AMR.

Section 2.4.2

Other Structures

Section 2.4.2.4

Cooling Water Canals

RAI 2.4.2.4-1: Section 2.4.2.4 of the LRA and its references provide general information on the intake and discharge structures of the canals. Provide additional information on the layout and geometry of the structures themselves.

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