



**FPL**

JUL 18 2001

L-2001-167  
10 CFR 50.36

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  
Response to Request for Additional Information  
Regarding the Containment Inservice Inspection Program  
For Relief Requests Nos. 22 and 26

By letter L-2001-080, dated April 12, 2001, Florida Power & Light (FPL) submitted Relief Requests Nos. 22 and 26 regarding the Turkey Point Containment Inservice Inspection program. By letter dated June 14, 2001, the U.S. Nuclear Regulatory Commission Staff requested additional information regarding the above referenced FPL submittal. The response to the request for additional information is provided in Attachment 1.

If you have any questions on this request, please contact Steve Franzone at (305) 246-6228.

Very truly yours,

R. J. Hovey  
Vice President  
Turkey Point Plant

SM

Attachment

cc: Regional Administrator, Region II, USNRC  
Senior Resident Inspector, USNRC, Turkey Point

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**Attachment 1****Relief Request No. 22, Section V, "Alternative Examination":****NRC RAI Request**

Please provide the time interval at which you will be torque testing the bolted penetrations for (1) Access penetrations, and (2) Non-access penetrations.

**FPL Response:**

FPL does not have a periodic torque-testing program for Access or Non-access penetrations. (1) For Access penetrations, torquing is conducted only as required by procedure when access penetrations are opened for outage access, repair or maintenance and prior to being placed back in-service. (2) For Non-access penetrations, torquing is conducted as required by procedure or work order when non-access penetrations are opened for repair or maintenance prior to being placed back in-service.

**Relief Request No. 26, Section V, "Alternative Examination":****NRC RAI Request**

Please provide the time-interval at which you will ensure the integrity of the seals and gaskets of the bolted penetrations by (1) leak-rate testing, and (2) visual examination, as required by Appendix J, Title 10, Code of Federal Regulations, Part 50, which provides licensees the flexibility in scheduling Type B leak-rate.

**FPL Response**

The seals and gaskets of bolted penetrations are examined by a type B or C local leak-rate test prior to any maintenance that could affect containment integrity in order to establish an As-found condition of the penetration. Prior to re-assembly, the seals and gaskets are examined and if necessary replaced by maintenance personnel. After the penetration is reassembled, an As-left test is performed to ensure that the penetration leakage meets the administrative limits.

- (1) Currently, FPL is testing the integrity of the seals and gaskets of the bolted penetrations by leak-rate testing, as required by Appendix J, Title 10, Code of Federal Regulations, Part 50. Plant procedures establish the maximum frequency based on acceptable performance as once every 60 months.
- (2) FPL does not perform visual examination in conjunction with local leak rate testing for the seals and gaskets of the bolted penetrations on a periodic basis. Visuals are performed only as part of the maintenance program.