



FPL

OCT 07 2001

L-2001-223

10 CFR §50.55a

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

Re: Turkey Point Unit 3
Docket No. 50-250
ASME Section XI Relief Request No. 29,
Response to Request for Additional Information

In accordance with 10 CFR §50.55a, Florida Power and Light Company (FPL) requested in letter L-2001-214, dated September 24, 2001, relief from portions of the ASME Code, Section XI, Rules for Inservice Inspection of Nuclear Power Plant Components, 1989 Edition.

In a telephone conversation on October 3, 2001, your staff raised two questions on Relief Request #29, regarding the impracticality of (inability to) characterizing any flaw remaining in the original weld material, and regarding FPL's conclusion that service-related cracks should not exist in the ferritic material of the low alloy reactor pressure vessel head.

With respect to flaw characterization, the original CRDM nozzle to closure head weld configuration is extremely difficult to test ultrasonically (UT) due to the compound curvature and fillet radius. These conditions preclude ultrasonic coupling and control of the sound beam needed to perform flaw sizing with reasonable confidence in the measured flaw dimension. Therefore it is impractical to, and presently no NDE technology has been identified that can, characterize flaw geometries that may exist therein. Not only is the configuration not conducive to UT but the dissimilar metal interface between the NiCrFe weld and the low alloy steel closure head increases the UT difficulty. Based on an inability to characterize the flaw, FPL has therefore assumed, for analysis purposes, that a flaw (or flaws) may exist in this weld that extends from the weld surface to the interface between the weld and the closure head base material. Furthermore, due to limited accessibility from the closure head outer surface and the proximity of adjacent nozzle penetrations, it is impractical to scan from this surface on the closure head base material to detect flaws in the vicinity of the original weld. As a clarification, the inability to characterize the flaw will continue in the foreseeable future, and subsequent examinations will also be impractical.

Regarding service-related cracks in the head material, based on extensive industry experience and Framatome ANP direct experience, there are no known cases where flaws initiating in an Alloy 82/182 weld have propagated into the ferritic base material. The surface examinations performed associated with flaw removal during recent repairs at Oconee 1 and 3 on closure head CRDM penetrations, Catawba 2 steam generator channel head drain connection penetration, ANO-1 hot leg level tap penetrations and the VC Summer Hot Leg pipe to primary outlet nozzle repair (reference MRP-44: Part I: Alloy 82/182 Pipe Butt Welds, EPRI, 2001. TP-1001491) all support the assumption that the flaws would blunt at the interface of the NiCrFe weld to ferritic base material. Additionally, the Small Diameter Alloy 600/690 Nozzle Repair Replacement Program (CE NPSD-1198-P) provides data that shows PWSCC does not occur in ferritic pressure vessel steel. Based on industry experience and operation stress levels there is no evidence that service related cracks would propagate through the Alloy 82/182 interface and into the ferritic material.

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Should there be any questions, please contact Andy Zielonka at 305-246-6206.

Very truly yours,



John P. McElwain
Vice President
Turkey Point Plant

CLM

cc: Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant
Florida Department of Health and Rehabilitative Services