



FPL

JAN 30 2003

L-2003-019
10 CFR 50.36
10 CFR 50.90

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
ASME Section XI Relief Request Nos. 30 & 31
FPL Response to NRC Comment on Relief Request 30 and 31

By letter L-2002-044, Florida Power and Light Company (FPL) submitted on March 1, 2002, Relief Requests 30 and 31 associated with Reactor Vessel Closure Head Repair. NRC requested additional information and FPL responded by letters L-2002-087, dated June 6, 2002 and L-2002-167, dated August 19, 2002.

The NRC Staff requested to have a telephone conference with FPL on December 19, 2002.

The purpose of this letter is to document the NRC's telecon request and FPL's response to aid the Staff in completing their review of the above mentioned Relief Requests.

Should there be any questions on this letter, please contact John Manso at (305) 246-6622.

Very truly yours,

John P. McElwain
Vice President
Turkey Point Plant

SM

Attachment

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

A047

Attachment to L-2003-019

NRC Request

Please comment on successive inspection plans for new Reactor Pressure Vessel (RPV) to Control Element Drive Mechanism (CEDM) tube pressure retaining welds, which are deposited approximately mid-wall of the RPV head. The discussion should include the types of nondestructive examination (NDE) that are going to be performed and the frequency. If successive inspections are not going to be performed, provide the technical justification and basis for not performing a successive/repetitive inspection on the new pressure boundary welds.

FPL Response

There is no requirement in Section XI to perform successive examinations on a new weld. The recommended inspection frequency in Electric Power Research Institute (EPRI) Material Reliability Program MRP-75, would have FPL perform a subsequent non-visual inspection within 4 Effective Degradation Years (EDY) of finding an indication and relocating the new pressure boundary weld.

This is a generic repair, which has received a successful inspection after one eighteen month cycle of operation at Oconee Nuclear Station 2 in the fall of 2002 with no indications (penetrations # 4, 6, 18, and 30). Therefore, the adequacy of the repair method has been demonstrated. FPL will monitor the results of any additional re-examinations performed in the industry and adjust our inspection plans as appropriate, based on the results.

FPL proposes to re-examine at least one repair CRDM/CEDM after two 18 month cycles of operation unless head replacement is completed prior to that time interval. The data collected would supplement and extend the data being generated at the plants currently inspecting after one cycle. This re-examination would be in excess of both code requirements and MRP recommendation. FPL would also perform a top of head bare metal visual during every refueling outage based on the current MRP-75 recommendations.

It is anticipated that this re-examination would be ultrasonic, but current technology at the time of inspection will dictate the methods and test parameters.

FPL would also re-inspect if visual results prior to the two cycles showed evidence of leakage.