

May 24, 2004

Mr. J. A. Stall  
Senior Vice President, Nuclear and  
Chief Nuclear Officer  
Florida Power and Light Company  
P.O. Box 14000  
Juno Beach, Florida 33408-0420

SUBJECT: TURKEY POINT UNITS 3 AND 4 — REQUEST FOR ADDITIONAL  
INFORMATION REGARDING FOURTH INTERVAL INSERVICE TEST RELIEF  
REQUESTS (TAC NOS. MC1717, MC1718, MC1719, MC1720, MC1721,  
MC1722, MC1723, MC1724, MC 1725, MC1726, MC1727, MC1728, MC1729,  
MC1730, MC1733, MC1734, MC1735, MC1736)

Dear Mr. Stall:

By letter dated July 8, 2002, Florida Power and Light Company requested relief from the Inservice Testing requirements specified in the American Society of Mechanical Engineers Code.

Based on our review of your submittal and questions generated during the October 2002 audit, the Nuclear Regulatory Commission staff finds that a response to the enclosed Request for Additional Information is needed before we can complete the review.

This request was discussed with your staff on May 10, 2004, and it was agreed that a response would be provided within 45 days of the issuance of this letter.

If you have any questions, please contact me at (301) 415-2315.

Sincerely,

**/RA/**

Eva A. Brown, Project Manager, Section 2  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-250 and 50-251

Enclosure: Request for Additional Information

cc w/encl: See next page

Mr. J. A. Stall  
Florida Power and Light Company

## **TURKEY POINT PLANT**

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REQUEST FOR ADDITIONAL INFORMATION  
FOURTH 10-YEAR TESTING INTERVAL  
PUMP VALVE RELIEF REQUEST  
NOS. PR-01, PR-02, PR-03, PR-04, PR-05, PR-06,  
VR-01, VR-02, AND VR-03  
FLORIDA POWER AND LIGHT COMPANY  
TURKEY POINT, UNITS 3 AND 4  
DOCKET NOS. 50-250 AND 50-251

1. Relief Request PR-03, Containment Spray (CS) Pump Comprehensive Pump Test

- a. The test data provided would indicate that the preoperation pump curve is the more representative curve for pump performance. The preoperation curve (and performance curve) is relatively flat at the pump test point. The purpose of the comprehensive pump test is to test the hydraulic and mechanical condition of the pump. The miniflow test point (27.6 percent of design flow) does not appear to provide a meaningful assessment of pump health and operational performance.

From the submittal it appears that the performance curve is the minimum acceptable performance of the CS pumps to meet the accident analysis. Is this assumption correct? Describe the margin available at the design flow rate of 1450 gallons per minute and provide test results and any evaluations from the construction preoperational tests.

- b. The basis section addresses a previous modification to increase the test flow rate and establishing a full flow test loop by removing a check valve (890A/B). Provide an estimate of the cost to perform modifications to meet American Society of Mechanical Engineers (ASME) Code required testing.
- c. Describe the preventive maintenance performed on the pumps and a history of the results.

2. Relief Request PR-04, Residual Heat Removal Discharge and Suction Pressure Gauge Range Requirements

The comprehensive pump test is a stringent test with tight acceptance criteria and the Code recognizes that temporary instrumentation may be required to perform the testing. The submittal appears to be inconsistent with the guidance of NUREG-1482, with respect to the comprehensive pump test in that the combination of range and accuracy does not yield a reading at least equivalent to the reading achieved from instruments that meet the Code requirements. If a delta-p gage was installed, the allowable range based on a normal 100 psi delta-p would require a 0–300 pounds-per-square-inch gage (psig) (maximum) and the maximum inaccuracy would be 1.5 psig. The combination of range and accuracy is twice that allowed by the ASME Code for the comprehensive pump test and combined with the stringent acceptance criteria of the comprehensive pump test does not appear to provide an acceptable level of quality and safety.

Please provide additional justification to support the alternative with respect to the comprehensive pump test.

Enclosure