



MAY 11 2011

L-2011-176

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 2055-0001

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
License Renewal (LR), Reactor Vessel Internals (RVI) Inspection Program,
Letter of Intent to Adopt Materials Reliability Program (MRP) Report MRP-227,
“Pressurized Water Reactor Internals Inspection and Evaluation Guidelines” and
Revision of Commitments

The Reactor Vessel Internals (RVI) Inspection Program commitments (currently listed in Section 16.1.6 of the Updated Final Safety Analysis Report) were based on industry knowledge available at the time licenses for Turkey Point Units 3 and 4 were renewed. Since that time, industry led efforts have been in progress by the Electric Power Research Institute (EPRI) Materials Reliability Program (MRP) Reactor Internals Issues Task Group (RI-ITG) and, later by the MRP Reactor Internals Focus Group (RI-FG). The EPRI MRP RI-FG has developed MRP-227, “Pressurized Water Reactor Internals Inspection and Evaluation Guidelines,” (MRP-227-Revision 0), which was submitted to Nuclear Regulatory Commission (NRC) for approval by EPRI letter dated January 12, 2009 (ADAMS Accession No. ML090160204). NRC approval of MRP-227-Revision 0 is currently expected in June, 2011.

Florida Power & Light Company (FPL) has been actively involved in the MRP RI-FG development of MRP-227 to ensure that the inspection and evaluation guidelines are applicable to Turkey Point Units 3 and 4. On September 15, 2010, during a teleconference, FPL discussed with NRC Staff the intent to transition from the Turkey Point specific RVI Inspection Program to MRP-227. The purpose of this letter is to confirm FPL’s intent to adopt and implement the NRC approved MRP-227 guidelines for Turkey Point Units 3 and 4.

The outstanding renewed license commitment to implement the RVI Inspection Program prior to the end of the initial operating license term (July 19, 2012 for Unit 3 and April 10, 2013 for Unit 4) was based on the specific Turkey Point RVI Inspection Program that was previously approved by NRC. Adopting MRP-227 may impact the implementation date of the RVI Inspection Program, in that FPL may need additional time to address licensee actions identified in the NRC’s final safety evaluation for MRP-227. As such, following the issuance of the final NRC safety evaluation for MRP-227, FPL intends to address the required RVI Inspection Program renewed license commitment revisions and to pursue the required submittals to NRC accordingly.

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Should you have any questions, please contact Mr. Robert J. Tomonto, Licensing Manager, at 305-246-7327.

Very truly yours,



Michael Kiley
Vice President
Turkey Point Nuclear Plant

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cc: USNRC Regional Administrator, Region II
USNRC Project Manager, Turkey Point Nuclear Plant
USNRC Senior Resident Inspector, Turkey Point Nuclear Plant