

MAY 2 4 2013 L-2013-113 10 CFR 50.55a

U.S. Nuclear Regulatory Commission Attn: Document Control Desk Washington, DC 20555-0001

RE: Turkey Point Units 3 and 4 Docket Nos. 50-250 and 50-251 Inservice Inspection Plan Submittal of Relief Request No. 12

Pursuant to 10 CFR 50.55a(a)(3)(ii), Florida Power and Light (FPL) requests relief from ASME Section XI, section IWB-5200, subsection IWB-5222, paragraph (b), for the Class 1 pressure test boundaries subject to system pressurization identified in Table 1 and plant drawings of the attached Relief Request No 12. The relief is requested on the basis that hardship and unusual difficulty exists without compensating increase in the level of quality and safety. As discussed in the attached Relief Request, the use of the proposed alternative provides reasonable assurance of structural integrity or leak tightness of the subject components.

Due to the extended refueling outages for the extended power uprate (EPU) Turkey Point plant modifications, FPL is invoking the provision of ASME Code Section XI, IWA-2430(d)1 to extend the Fourth 10-Year ISI interval by 1-year for both Turkey Point Units 3 and 4 to complete the required inservice inspections during the refueling outages for Cycle 27 and Cycle 28 for Units 3 and Units 4 respectively, and to credit those inspections/examinations to the Fourth 10-Year ISI Interval. Accordingly, FPL requests the approval of the attached Relief Request No. 12 by February 1, 2014 to support the Unit 3 refueling outage for Cycle 27 currently scheduled in the Spring of 2014, and the Turkey Point Unit 4 refueling outage activities currently scheduled for Cycle 28 in the Fall of 2014.

If you have any questions or require additional information, please contact Robert Tomonto, Licensing Manager, at (305) 246-7327.

Very truly yours,

Michael Kiley Site Vice President Turkey Point Nuclear Plant

Attachment

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

A DYT

#### 10 CFR 50.55a Relief Request Number 12

#### Proposed Alternative in Accordance with 10 CFR 50.55a (a)(3)(ii)

#### Hardship or Unusual Difficulty Without Compensating Increase in Level of Quality or Safety

#### 1. ASME Code Component(s) Affected:

The affected components associated with this relief request are the Turkey Point Units 3 and 4 Class 1 pressure retaining components within the identified system boundary listed in Table 1 and the attached plant drawings.

#### 2. Applicable Code Edition and Addenda:

The code of record for the Turkey Point Units 3 and Unit 4 for the Fourth 10-year Inservice Inspection (ISI) interval is the 1998 Edition with Addenda through 2000 of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV), Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components."

#### 3. Applicable Code Requirement:

The ASME B&PV Section XI 1998 Edition with Addenda through 2000, Table IWB-2500-1, Section IWB-5200 "System Test Requirements", subsection IWB-5222 "Boundaries", paragraph (b), requires that "The pressure retaining boundary during the system leakage test conducted at or near the end of each inspection interval shall extend to all Class 1 pressure retaining components within the system boundary."

## 4. Basis for Hardship or Unusual Difficulty without Compensating Increase In level of Quality or Safety

Turkey Point Units 3 and 4 request relief from IWB-5222(b) in accordance with 10 CFR 50.55a(a)(3)(ii) on the basis that hardship or unusual difficulty exists, without a compensating increase in the level of quality and safety. The attached Table 1 and plant drawings identify the Class 1 pressure retaining components that are associated with the requested relief.

The reason for the relief is discussed below.

Turkey Point Units 3 and 4 design of Class 1 vents and drains typically consist of a single isolation valve with a capped/blind flanged end that constitutes the Class 1 system boundary. Many of these valves are not readily accessible due to their physical locations and radiation/contamination levels in the area. Pressurization of these locations for testing would be performed in Mode 3 and would involve opening these single isolation valves to pressurize to the extended Class 1 pressure retaining components within the system

boundary. After performance of the required VT-2 visual examination, these single isolation valves would be closed, isolating a high temperature, pressurized volume of water between the isolation valve and the capped/blind flanged end. This results in an undesirable plant configuration that would be conducive to pressure lock or the initiation of system leakage from valve packing or capped/blind flanged ends.

In addition, the piping associated with the vents and drains will contain pressurized reactor coolant fluid between the valve and cap/blind flange. During the subsequent refueling outage, after depressurization of the reactor coolant system, the valve would need to be opened prior to cap/blind flange removal in order to release the pressurized slug of reactor coolant system fluid contained between the valve and cap/blind flange. This will need to be performed in order to eliminate a safety hazard.

Turkey Point Units No. 3 and 4 design also requires substantial effort to extend the Class 1 system boundary where check valves or non-redundant components serve as the first system isolation from the reactor coolant system. Such configurations may require check valve disassembly or other temporary configurations to achieve test pressures at upstream piping and valves. Since the Class 1 system pressure testing is performed in Mode 3, these temporary configurations could conflict with Technical Specification requirements and valve alignments. Establishing and restoring such temporary configurations could also result in an unwarranted increase in worker radiation exposures.

Relief is requested from fully pressurizing piping between the first and second isolation device on small bore size vent, drain, test, and fill lines in the Reactor Coolant System (RCS), which range in size from 0.5 inch to 2 inches. The configurations are either two small isolation valves in series, a valve and blind flange, or a valve and cap. In certain configurations, the piping between the two isolation boundaries will tee to a third valve that is also the second isolation boundary. The piping segments provide the design required double isolation barrier for the reactor coolant pressure boundary. The code required leakage test would be performed in Mode 3 at the normal operating temperature and pressure.

Leakage testing of these piping segments at nominal operating pressure in Mode 3 would require the opening of the inboard isolation valve at the normal operating RCS temperature and pressure conditions. In doing so, the design requirement for two primary coolant pressure boundary isolation devices would be violated. Additionally, opening of these valves introduces the potential risk for spills and personnel contamination. For configuration where blind flanges or caps are installed as the isolation device, opening of the inboard valve introduces the possibility of a personnel safety hazard if a flange or cap fails in the presence of inspection personnel.

A VT-2 visual examination is performed on these piping segments through the entire length as part of the Class 1 system inspection at the conclusion of each refueling outage. This leakage test does not specifically pressurize past the first isolation valve. Also, this leakage test is considered successful when no external or visible leakage is identified. Since this type of test assures that the combined first and second isolation devices are effective in maintaining the reactor coolant pressure boundary at normal operating temperature and pressure, the increase in safety achieved from the code required leakage test (IWB-5222(b)) is not commensurate with the hardship of performing such code required leakage testing.

#### 14-inch Residual Heat Removal (RHR) Motor Operated Valves (MOV)

Turkey Point Unit 3: This piping segment consists of approximately 26 feet of 14-inch piping between RHR inlet valves MOV-3-750 and MOV-3-751. Within this piping segment there is a 3/4 inch pipe branch with a 3/4 inch valve that branches off into a two 1/2 inch valves.

Turkey Point Unit 4: This piping segment consists of approximately 44 feet of 14 inch piping between RHR inlet valves MOV-4-750 and MOV-4-751. Within this piping segment there is a 1 inch pipe branch with a 1 inch valve that branches off into a 1 inch valve and a 1/2 inch valve. Also, within this 14-inch piping segment, there is a 3/4 inch vent valve.

MOV-3/4-750 and MOV-3/4-751 are interlocked to avoid over-pressurization of the RHR system. The interlock prevents manual opening of the valves with RCS pressure above the required pressure interlock setpoint.

A VT-2 visual examination is performed on these piping segments through the entire length as part of the Class 1 system inspection at the conclusion of each refueling outage. This proposed system pressure test does not specifically pressurize past the first isolation valve. It is possible that the piping becomes pressurized due to minor leakage past the first isolation valve. The leakage test is considered successful when no external or visible leakage is identified. This test will provide assurance that the combined first and second isolation devices are effective in maintaining the reactor coolant pressure boundary at normal operating temperature and pressure.

Based on the above, extension of the pressure retaining boundary during system leakage tests to Class 1 pressure retaining components within the system boundary represents a hardship and unusual difficulty that does not provide a compensating increase in the level of quality and safety.

# Safety Injection Loops Low Head Check Valves 3-875A/B/C, 4-875A/B/C, and Upstream Piping

These six piping segments consist of 10-in. piping spans connected to an 8-in. and 2-in. piping span along with 3/4 inch and 1 inch connections with valves. Pressure testing in Mode 3 would require a pressure source be connected at each segment location. In so doing, the design requirement for two primary coolant pressure boundary isolation devices would be violated. For test locations located overhead and away from normal personnel access areas, ladders or scaffolding would have to be installed to provide access to the piping segment and to open the valve.

The piping segments are inspected using VT-2 visual examination as part of the Class 1 system inspection at the conclusion of each refueling outage. The proposed system

pressure test will not specifically pressurize past the first isolation valve for this inspection. It is possible that the piping becomes pressurized due to minor leakage past the first isolation valve. However, the pressure in the segment will be at least at the operating pressure of the emergency core cooling system accumulators, which are pressurized to between 600 psig and 660 psig.

The acceptance criteria will be that no external or visible leakage will be allowed for the test to be successful. Therefore, based on the above, the imposition of the ASME Code requirements on the plant would cause a significant burden that would not be compensated by an increase in the level of quality and safety. The proposed alternative provides reasonable assurance that the subject line segments' leakage integrity will be maintained.

## Safety Injection Loops High Head Check Valves 3-874A/B, 4-874A/B, and Upstream Piping

These two piping segments consist of a 2-in. piping span between two check valves oriented toward the RCS. Pressure testing of these piping segments at nominal operating pressure in MODE 3 would require a modification to allow pressurizing to the normal operating RCS temperature and pressure conditions.

A VT-2 visual examination is performed on these piping segments through the entire length as part of the Class 1 system inspection at the conclusion of each refueling outage. The proposed system pressure test will not specifically pressurize past the first isolation valve for this inspection. It is possible that the piping becomes pressurized due to minor leakage past the first isolation valve. The acceptance criteria will be that no external or visible leakage will be allowed for the test to be successful.

Based on the above, it has been determined that compliance with the ASME Code requirement to perform the system pressure test on the subject line segments would result in a hardship that would not be compensated by an increase in quality and safety. The proposed alternative provides reasonable assurance that the subject line segments' leakage integrity will be maintained.

#### 5. Proposed Alternative and Basis for Use:

Title 10 of the Code of Federal Regulations (10 CFR), Section 50.55a(g)(4), specifies that ASME Code Class 1, 2, and 3 components (including supports) must meet the requirements, except for the design and access provisions and the preservice examination requirements, set forth in the ASME Code, Section XI to the extent practical within the limitations of design geometry and materials of construction of the components.

Paragraph 50.55a(a)(3) of 10 CFR Part 50 states, in part, that alternatives to the requirements of 10 CFR 50.55a(g) may be used when authorized by the NRC if the licensee demonstrates (i) the proposed alternatives would provide an acceptable level of quality and safety, or if (ii) compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

FPL is requesting authorization of an alternative to the requirements of the ASME Code Section XI, IWB-5222(b) pursuant to 10 CFR 50.55a(a)(3)(ii).

The proposed alternative for this request relief uses leakage testing. The Class 1 system boundary will be maintained in a normal, operational alignment during leakage tests for the items identified within Table 1 constituting exceptions to the Code-required boundary of IWB-5222(b). The VT-2 visual examination will extend to the Class 1 pressure retaining components within the system boundary during the performance of each system leakage test required by Table IWB-2500-1 examination category B-P. Items within Table 1 will be visually examined for evidence of leakage during system leakage testing without being pressurized.

Based on the discussion provided in Section 4, it is concluded that compliance with the specified requirements would result in hardship or unusual difficulty without compensating increase in the level of quality and safety, while the proposed alternative provides reasonable assurance of structural integrity or leak tightness of the subject components.

#### 6. Duration of Proposed Alternative:

Relief Request No. 12 is requested for Turkey Point Units 3 and 4 for the Fourth 10-Year ISI Interval. The Unit 3 Fourth 10-Year ISI Interval began February 22, 2004 to February 21, 2014 and the Unit 4 Fourth 10-Year Interval began April 15, 2004 to April 14, 2014.

Due to the extended refueling outages for the extended power uprate (EPU) Turkey Point plant modifications, FPL is invoking the provision of ASME Code Section XI, IWA-2430(d)1 to extend the Fourth 10-Year ISI interval by 1-year for both Turkey Point Units 3 and 4 to complete the required inservice inspections during the refueling outages for Cycle 27 and Cycle 28 for Units 3 and Units 4 respectively, and to credit those inspections/examinations to the Fourth 10-Year ISI Interval.

#### 7. Precedent

Similar relief has been granted for H.B Robinson Steam Electric Plant Unit No.2, Docket No. 50-261, TAC No. ME 8255, ML12181A26.

#### 8. Attachments

Plant Drawings referenced in Table 1

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Table 1   Relief Request No. 12   Turkey Point Unit 3 Affected Class 1 Pressure Retaining Components									
Affected Line or Component	Code Class	Pipe Diameter	Pipe Schedule	Approx Length	Exam Category	Drawing No.	Boundary Exception(s)		
Drain line below PZR safety valve RV-3-551A (pipe piece between 3-545 and 3-545A)	1	3/4 in.	A376 TP316 SMLS Sch. 160	≤ 1 ft.	B-P	5613-M-3041 Sh. 2	Valve 3-545 remains closed to avoid pressurizing downstream Class 1 pipe piece and valve 3-545A		
Drain line below PZR safety valve RV-3-551B (pipe piece between 3-546 and 3-546A and 3-585)	1	3/4 in.	A376 TP316 SMLS Sch. 160	≤ 2 ft.	B-P	5613-M-3041 Sh. 2	Valve 3-546 remains closed to avoid pressurizing downstream Class 1 pipe piece and valves 3-546A and 3-585		
Drain line below PRZ safety valve RV-3-551C (pipe piece between 3-547and 3-547A)	1	3/4 in.	A376 TP316 SMLS Sch. 160	≤ 1 ft.	B-P	5613-M-3041 Sh. 2	Valve 3-547 remains closed to avoid pressurizing downstream Class 1 pipe piece and valve 3-547A		
RCS loop intermediate loop "A" drain valve, liquid waste	aste 1	2 in.	A376 TP316 SMLS Sch. 160	≤1 ft.	B-P	5613-M-3041 Sh. 1	Valve 3-508A remains closed to avoid pressurizing downstream Class 1 piping and valves 3-508B and 3-542		
disposal piping, and leak-off valve.		3/4 in.	A376 TP316 SMLS Sch. 160	28 ft.					
RCS loop intermediate loop "B" drain valve and liquid waste disposal piping	1	2 in.	A376 TP316 SMLS Sch. 160	≤1 ft.	B-P	5613-M-3041 Sh. 1	Valve 3-515A remains closed to avoid pressurizing downstream Class 1 piping and valve 3-515B.		
RCS loop intermediate loop "C" drain valve and liquid waste disposal piping	1	2 in.	A376 TP316 SMLS Sch. 160	≤1 ft.	B-P	5613-M-3041 Sh. 1	Valve 3-505A remains closed to avoid pressurizing downstream Class 1 piping and valve 3-505B.		
RCP "A" seal injection drain valve and blind flange	1	3/4 in.	A376 TP316 SMLS Sch. 160	≤ 1 ft.	B-P	5613-M-3047 Sh. 3	Valve 3-300A remains closed to avoid pressurizing downstream pipe piece and flange		
RCP "A" seal water bypass vent valve and blind flange	1	3/4 in.	A376 TP316 SMLS Sch. 160	≤ 1 ft.	B-P	5613-M-3047 Sh. 3	Valve 3-300C remains closed to avoid pressurizing downstream pipe piece and flange		

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Table 1 Relief Request No. 12 Turkey Point Unit 3 Affected Class 1 Pressure Retaining Components									
Affected Line or Component	Code Class	Pipe Diameter	Pipe Schedule	Approx Length	Exam Category	Drawing No.	Boundary Exception(s)		
RCP "B" seal injection drain valve and cap	1	3/4 in.	A376 TP316 SMLS Sch. 160	≤ 1 ft.	B-P	5613-M-3047 Sh. 3	Valve 3-300D remains closed to avoid pressurizing downstream pipe piece and cap		
RCP "B" seal water bypass Vent valve and blind flange.	1	3/4 in.	A376 TP316 SMLS Sch. 160	≤ 1 ft.	B-P	5613-M-3047 Sh. 3	Valve 3-300F remains closed to avoid pressurizing downstream pipe piece and flange		
RCP "C" seal injection drain valve and cap	1	3/4 in.	A376 TP316 SMLS Sch. 160	≤ 1 ft.	B-P	5613-M-3047 Sh. 3	Valve 3-300G remains closed to avoid pressurizing downstream pipe piece and cap		
RCP "C" seal water bypass Vent valve and blind flange.	1	3/4 in.	A376 TP316 SMLS Sch. 160	≤ 1 ft.	B-P	5613-M-3047 Sh. 3	Valve 3-300J remains closed to avoid pressurizing downstream pipe piece and flange		
Auxiliary spray line vent valve	1	2 in.	A376 TP316 SMLS Sch. 160	139 ft.	B-P	5613-M-3047 Sh. 2	Valve CV-3-311 remains closed to avoid pressurizing downstream piping up to check valve 3-313 and vent pipe and vent valve 3-120J		
and upstream piping		3/4 in	A376 TP316 SMLS Sch. 160	<u>&lt;</u> 1 ft.	D-F				
		3/4 in. 1 in	A376 TP316 SMLS Sch. 160	≤ 3 ft.			Check valve 3-875A to remain closed to avoid disassembly or other		
		2 in.	A376 TP316 SMLS Sch. 160	100 ft.			temporary configurations required to achieve test pressures at upstream piping and valves: 3-868A, 3-873D, 3-		
Safety injection loop cold leg injection check valve 3-875A and upstream piping	1	8 in.	A376 TP316 SMLS Sch. 120	3 ft.	B-P	5613-M-3064 Sh. 1	873A, 3-876A, 3-875D, 3-940A, 3- 884B, and 3-941J		
		10 in.	A376 TP316 SMLS Sch. 140	35 ft.					

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Table 1 Relief Request No. 12 Turkey Point Unit 3 Affected Class 1 Pressure Retaining Components									
Affected Line or Component	Code Class	Pipe Diameter	Pipe Schedule	Approx Length	Exam Category	Drawing No.	Boundary Exception(s)		
		3/4 in. 1 in.	A376 TP316 SMLS Sch. 160	≤ 5 ft.			Check valve 3-875B to remain closed		
Safety injection loop cold leg injection check valve 3-875B	1	2 in.	A376 TP316 SMLS Sch. 160	70 ft.	B-P	5613-M-3064	to avoid disassembly or other temporary configurations required to achieve test pressures at upstream		
and upstream piping	ľ	8 in.	A376 TP316 SMLS Sch. 120	10 ft.		Sh. 1	piping and valves 3-868B, 3-873E, 3- 873B 3-875E, 3-940B, 3-884D, 3- 941K, 3-941R, 3-941V, 3-876B and 3- 876D		
		10 in.	A376 TP316 SMLS Sch. 140	58 ft.					
	1	3/4 in. 1 in.	A376 TP316 SMLS Sch. 160	≤ 3 ft.	B-P	5613-M-3064 Sh. 1	Check valve 3-875C to remain closed to avoid disassembly or other temporary configurations required to achieve test pressures at upstream piping and valves 3-868C, 3-873F, 3- 873C, 3-940C, 3-884F, 3-875F, 3-		
		2 in.	A376 TP316 SMLS Sch. 160	69 ft.					
Safety injection loop cold leg injection check valve 3-875C and upstream piping		8 in.	A376 TP316 SMLS Sch. 120	18 ft.					
		10 in.	A376 TP316 SMLS Sch. 140	41 ft.			876E, 3-942A, and 3-876C.		
Residual heat removal motor- operated valve MOV-3-750	1	14 in.	A376 TP316 SMLS Sch. 140	26 ft.	B-P	5613-M-3050	Valve MOV-3-750 to remain closed to avoid pressuring downstream piping		
and common suction piping	I	3/4 in. 1/2 in.	A376 TP316 SMLS Sch. 160	3 ft.		Sh. 1	and valves, MOV-3-751, 3-750B, 3- 750C and 3-750D.		
Downstream piping of CV-3- 310B	1	3 in.	A376 TP316 SMLS Sch. 160	45 ft.	B-P	5613-M-3047 Sh. 2	Valve CV-3-310B to remain closed to avoid pressurizing downstream piping up to check valve 3-312B		

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Table 1   Relief Request No. 12   Turkey Point Unit 3 Affected Class 1 Pressure Retaining Components									
Affected Line or Component	Code Class	Pipe Diameter	Pipe Schedule	Approx Length	Exam Category	Drawing No.	Boundary Exception(s)		
Safety Injection check valves 3-874A, 3-874B and upstream piping	1	2 in.	A376 TP316 SMLS Sch. 160	222 ft.		5613-M-3062 Sh. 1	Check valves 3-874A and 3-874B to remain closed to avoid disassembly or other temporary configurations		
		3/4 in.	A376 TP316 SMLS Sch. 160	≤1 ft.	B-P		required to achieve test pressures at upstream piping and valves MOV-3- 866A and B, 3-941C and D, and 3- 957		
Pressurizer Spray line drain valve and cap	1	3/4 in.	A376 TP316 SMLS Sch. 160	≤1 ft.	B-P	5613-M-3041 Sh. 2	Valve 3-568 remains closed to avoid pressurizing downstream pipe piece and cap		
Pressurizer Spray line drain valve and cap	1	3/4 in.	A376 TP316 SMLS Sch. 160	≤1 ft.	B-P	5613-M-3041 Sh. 2	Valve 3-569 remains closed to avoid pressurizing downstream pipe piece and cap		
Regenerative Heat Exchanger outlet drain line and cap	1	3/4 in.	A376 TP316 SMLS Sch. 160	≤ 1 ft.	B-P	5613-M-3047 Sh. 1	Valve 3-201A remains closed to avoid pressurizing downstream pipe piece and cap		

	Table 1 Relief Request No.12 Turkey Point Unit 4 Affected Class 1 Pressure Retaining Components									
Affected Line or Component	Code Class	Pipe Diameter	Pipe Schedule	Approx Length	Exam Category	Drawing No.	Boundary Exception(s)			
Drain line below PZR safety valve RV-4-551A (pipe piece between 4-545 and 4-545A)	1	3/4 in.	A376 TP316 SMLS Sch. 160	≤ 1 ft.	B-P	5614-M-3041 Sh. 2	Valve 4-545 remains closed to avoid pressurizing downstream Class 1 pipe piece and valve 4- 545A			
Drain line below PZR safety valve RV-4-551B (pipe piece between 4-546, 4-546A, and 4-585)	1	3/4 in.	A376 TP316 SMLS Sch. 160	≤ 2 ft.	B-P	5614-M-3041 Sh. 2	Valve 4-546 remains closed to avoid pressurizing downstream Class 1 pipe piece and valves 4- 546A and 4-585			
Drain line below PRZ safety valve RV-4-551C (pipe piece between 4-547and 4-547A)	1	3/4 in.	A376 TP316 SMLS Sch. 160	≤ 1 ft.	B-P	5614-M-3041 Sh. 2	Valve 4-547 remains closed to avoid pressurizing downstream Class 1 pipe piece and valve 4- 547A			
RCS loop intermediate loop "A" drain valve, liquid waste	1	2 in.	A376 TP316 SMLS Sch. 160	≤ 1 ft.	B-P	5614-M-3041	Valve 4-508A remains closed to avoid pressurizing downstream			
disposal piping, and leak-off valve	I	3/4 in.	A376 TP316 SMLS Sch. 160	28 ft.		Sh. 1	Class 1 piping and valves 4-508B and 4-542			
RCS loop intermediate loop "B" drain valve and liquid waste disposal piping	1	2 in.	A376 TP316 SMLS Sch. 160	≤ 1 ft.	B-P	5614-M-3041 Sh. 1	Valve 4-515A remains closed to avoid pressurizing downstream Class 1 piping and valve 4-515B.			
RCS loop intermediate loop "C" drain valve and liquid waste disposal piping	1	2 in.	A376 TP316 SMLS Sch. 160	≤ 1 ft.	B-P	5614-M-3041 Sh. 1	Valve 4-505A remains closed to avoid pressurizing downstream Class 1 piping and valve 4-505B.			
RCP "A" seal injection drain valve and blind flange	1	3/4 in.	A376 TP316 SMLS Sch. 160	≤ 1 ft.	B-P	5614-M-3047 Sh. 3	Valve 4-300A remains closed to avoid pressurizing downstream pipe piece and flange			

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Table 1   Relief Request No.12   Turkey Point Unit 4 Affected Class 1 Pressure Retaining Components									
Affected Line or Component	Code Class	Pipe Diameter	Pipe Schedule	Approx Length	Exam Category	Drawing No.	Boundary Exception(s)		
RCP "A" seal water bypass vent valve and blind flange	1	3/4 in.	A376 TP316 SMLS Sch. 160	≤ 1 ft.	B-P	5614-M-3047 Sh. 3	Valve 4-300C remains closed to avoid pressurizing downstream pipe piece and flange		
RCP "B" seal injection drain valve and cap	1	3/4 in.	A376 TP316 SMLS Sch. 160	≤ 1 ft.	B-P	5614-M-3047 Sh. 3	Valve 4-300D remains closed to avoid pressurizing downstream pipe piece and cap		
RCP "B" seal water bypass Vent valve and blind flange.	1	3/4 in.	A376 TP316 SMLS Sch. 160	≤ 1 ft.	B-P	5614-M-3047 Sh. 3	Valve 4-300F remains closed to avoid pressurizing downstream pipe piece and flange		
RCP "C" seal injection drain valve and cap	1	3/4 in.	A376 TP316 SMLS Sch. 160	≤ 1 ft.	B-P	5614-M-3047 Sh. 3	Valve 4-300G remains closed to avoid pressurizing downstream pipe piece and cap		
RCP "C" seal water bypass Vent valve and blind flange.	1	3/4 in.	A376 TP316 SMLS Sch. 160	≤ 1 ft.	B-P	5614-M-3047 Sh. 3	Valve 4-300J remains closed to avoid pressurizing downstream pipe piece and flange		
Piping downstream of CV-4- 311	1	2 in.	A376 TP316 SMLS Sch. 160	142 ft.	B-P	5614-M-3047 Sh. 2	Valve CV-4-311 remains closed to avoid pressurizing downstream piping up to check valve 4-313.		
Safety injection loop cold leg injection check valve 4-875A and upstream piping	1	3/4 in. 1 in	A376 TP316 SMLS Sch. 160	≤ 3 ft.	B-P	5614-M-3064 Sh. 1	Check valve 4-875A to remain closed to avoid disassembly or other temporary configurations		
		2 in.	A376 TP316 SMLS Sch. 160	89 ft.			required to achieve test pressures at upstream piping and valves 4-868A, 4-868D, 4-873D, 4-873A,		
		8 in.	A376 TP316 SMLS Sch. 120	15 ft.			4-876A, 4-875D, 4-876E 4-940A, 4-884B, and 4-941J		

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Table 1     Relief Request No.12     Turkey Point Unit 4 Affected Class 1 Pressure Retaining Components									
Affected Line or Component	Code Class	Pipe Diameter	Pipe Schedule	Approx Length	Exam Category	Drawing No.	Boundary Exception(s)		
		10 in.	A376 TP316 SMLS Sch. 140	46 ft.					
		3/4 in. 1 in.	A376 TP316 SMLS Sch. 160	≤ 4 ft.			Check valve 4-875B to remain closed to avoid disassembly or		
Safety injection loop cold leg injection check valve 4-875B	1	2 in.	A376 TP316 SMLS Sch. 160	110 ft.	B-P	5614-M-3064 Sh. 1	other temporary configurations required to achieve test pressures at upstream piping and valves		
and upstream piping		8 in.	A376 TP316 SMLS Sch. 120	21 ft.	D-F		4-868B, 4-868E, 4-873E, 4-873B, 4-875E, 4-940B, 4-884D, 4-941K, 4-941R, 4-941V, 4-876B and 4- 876D		
		10 in.	A376 TP316 SMLS Sch. 140	59 ft.					
	1	3/4 in. 1 in.	A376 TP316 SMLS Sch. 160	≤ 4 ft.	B-P	5614-M-3064 Sh. 1	Check valve 4-875C to remain closed to avoid disassembly or other temporary configurations required to achieve test pressures at upstream piping and valves 4-868F, 4-868C, 4-873F, 4-873C, 4-940C, 4-941L, 4-884F, 4-875F, 4-876C		
		2 in.	A376 TP316 SMLS Sch. 160	87 ft					
Safety injection loop cold leg injection check valve 4-875C and upstream piping		8 in.	A376 TP316 SMLS Sch. 120	5 ft.					
		10 in.	A376 TP316 SMLS Sch. 140	49 ft.					
Residual heat removal motor-		14 in.	A376 TP316 SMLS Sch. 140	44 ft.		5614-M-3050	Valve MOV-4-750 to remain closed to avoid pressuring downstream piping and valves, MOV-4-751, 4- 750A, 4-750B, 4-750C and 4- 750D.		
operated valve MOV-4-750 and common suction piping	1	3/4 in. 1/2 in. 1 in.	A376 TP316 SMLS Sch. 160	10 ft.	B-P	Sh. 1			

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	Table 1     Relief Request No.12     Turkey Point Unit 4 Affected Class 1 Pressure Retaining Components									
Affected Line or Component	Code Class	Pipe Diameter	Pipe Schedule	Approx Length	Exam Category	Drawing No.	Boundary Exception(s)			
Piping downstream of CV-4- 310B	1	3 in.	A376 TP316 SMLS Sch. 160	48 ft.	B-P	5614-M-3047 Sh. 2	Valve CV-4-310B to remain closed to avoid pressurizing downstream piping up to check valve 4-312B			
Safety Injection check valves	1	2 in.	A376 TP316 SMLS Sch. 160	140 ft.			Check valves 4-874A and 4-874B to remain closed to avoid disassembly or other temporary configurations required to achieve test pressures at upstream piping and valves MOV-4-866A and B, 4- 941C and D, and 4-957			
4-874A, 4-874B and upstream piping		3/4 in. 1 in.	A376 TP316 SMLS Sch. 160	≤ 3 ft.	B-P	5614-M-3062 Sh. 1				
Pressurizer Spray line drain valve and cap	1	3/4 in.	A376 TP316 SMLS Sch. 160	≤ 1 ft.	B-P	5614-M-3041 Sh. 2	Valve 4-568 remains closed to avoid pressurizing downstream pipe piece and cap			
Pressurizer Spray line drain valve and cap	1	3/4 in.	A376 TP316 SMLS Sch. 160	≤ 1 ft.	B-P	5614-M-3041 Sh. 2	Valve 4-569 remains closed to avoid pressurizing downstream pipe piece and cap			
Regenerative Heat Exchanger outlet drain line and flange	1	3/4 in.	A376 TP316 SMLS Sch. 160	≤ 1 ft.	B-P	5614-M-3047 Sh. 1	Valve 4-201A remains closed to avoid pressurizing downstream pipe piece and flange			































