

NRR-PMDAPEm Resource

From: Saba, Farideh
Sent: Monday, September 09, 2013 9:48 AM
To: Bob.Toronto@fpl.com; Hanek, Olga (Olga.Hanek@fpl.com); Mihalakea, Stavroula (Stavroula.Mihalakea@fpl.com)
Cc: Klett, Audrey
Subject: RAIs for TACs MF1903-08 Regarding Relief Request #12

Importance: High

Bob/Olga/Stavy,

Background

By letter dated May 24, 2013 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13164A186), Florida Power & Light Company (the licensee) submitted Relief Request No. 12 to the U.S. Nuclear Regulatory Commission (NRC) for review and authorization. The licensee is requesting NRC authorization of the use of a proposed alternative to a requirement in the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code), Section XI. The requirement is to perform a system leakage test at a pressure corresponding to 100 percent rated reactor power on Class 1 reactor coolant system small bore vent and drain line piping between the first and second isolation devices, on segments of the residual heat removal piping, and on segments of the safety injection loop piping.

In order to complete our evaluation, the NRC staff requests the following additional information by October 11, 2013, to complete its review.

Request for Additional Information (RAI)

RAI-1:

Describe any history of degradation, such as fatigue or stress corrosion cracking, of the subject lines at Turkey Point Nuclear Generating Unit Nos. 3 and 4.

RAI-2:

Provide an estimate of the radiological dose associated with pressurizing the subject vent and drain lines to the required pressure.

RAI-3:

For the 14-inch diameter segment between the residual heat removal (RHR) inlet motor operated valves (MOVs) 750 and 751, a VT-2 visual examination would indicate leakage only if the lines are pressurized or have been pressurized during operation.

- a. What is the pressure in this segment during normal operation?
- b. Is there a provision to pressurize the subject piping segment between the two MOVs to the required test pressure (i.e., is there a test connection in this segment)?
- c. Describe the hardship associated with pressurizing this segment to the pressure corresponding to 100 percent rated reactor power and performing the VT-2 visual examination.
- d. Provide a technical basis for expectation of leak tightness of the subject segment if the line is not pressurized to the required pressure when performing the VT-2 visual examination.

RAI-4:

Are the subject low head safety injection check valves and upstream piping continuously pressurized during an operating cycle? Would the provisions of ASME Code Case N-731 apply to these segments?

RAI-5:

For the subject safety injection loop high head check valves and upstream piping lines, a VT-2 visual examination would indicate leakage only if the lines are pressurized or have been pressurized during operation.

- a. What is the maximum pressure in these lines during normal operation?
- b. Describe the hardship associated with pressurizing this segment to the pressure corresponding to 100 percent rated reactor power.
- c. Is there a provision to pressurize the subject piping segment to a pressure that is at least the pressure of the high head safety injection pump in operation? If a hardship is associated with pressurizing the subject piping segment, please describe it.
- d. Provide a technical basis for expectation of leak tightness of the subject lines if they are not pressurized when performing the VT-2 visual examination.

Thanks,

Farideh

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