

NRR-PMDAPEm Resource

From: Klett, Audrey
Sent: Tuesday, September 01, 2015 1:02 PM
To: 'Mitch.Guth@fpl.com'
Cc: 'Mihalakea, Stavroula' (Stavroula.Mihalakea@fpl.com); 'Hanek, Olga' (Olga.Hanek@fpl.com)
Subject: Request for Additional Information re. Turkey Point Unit 3 and 4 Relief Requests 16 and 17 for 4th 10-year ISI Intervals (TACs MF5796 and MF5797)

Hi Mitch,

By application dated February 13, 2015 (Agencywide Documents Access and Management System Accession Number ML15062A279), Florida Power & Light Company (the licensee) submitted Relief Requests 16 and 17 (RR-16 and RR-17) for the fourth 10-year inservice inspection intervals for Turkey Point Nuclear Generating Unit Nos. 3 and 4 (Turkey Point 3 and 4). The U.S. Nuclear Regulatory Commission staff reviewed the application and identified areas where it needs additional information to support its review. The Request for Additional Information (RAI) is provided below. As discussed with Ms. Stavy Mihalakea of the licensee's staff on September 1, 2015, the NRC staff is requesting the licensee's response to the RAI by September 30, 2015.

RAI-1

Regarding RR-16 and RR-17, Examination Category B-D, Item B3.120, Full Penetration Welded Nozzles in Vessels:

Beginning with the 1999 Addenda of the ASME Code, Section XI, volumetric examination requirements for Examination Category B-D, Item B3.120, Pressurizer Nozzle Inside Radius Sections have been removed from Table IWB-2500-1. Thus, no volumetric examination is required by the licensee's adopted version of the ASME Code. However, the NRC imposed volumetric requirements per 10 CFR 50.55a(b)(2)(xxi), which states the following:

(xxi) Section XI condition: Table IWB-2500-1 examination requirements. (A) Table IWB-2500-1 examination requirements: First provision. The provisions of Table IWB 2500-1, Examination Category B-D, Full Penetration Welded Nozzles in Vessels, Items B3.40 and B3.60 (Inspection Program A) and Items B3.120 and B3.140 (Inspection Program B) of the 1998 Edition must be applied when using the 1999 Addenda through the latest edition and addenda incorporated by reference in paragraph (a)(1)(ii) of this section. A visual examination with magnification that has a resolution sensitivity to detect a 1-mil width wire or crack, utilizing the allowable flaw length criteria in Table IWB-3512-1, 1997 Addenda through the latest edition and addenda incorporated by reference in paragraph (a)(1)(ii) of this section, with a limiting assumption on the flaw aspect ratio (i.e., $a/l = 0.5$), may be performed instead of an ultrasonic examination.

Please state whether a visual examination in accordance with the requirements listed above has been completed or considered as an alternative to supplement the ultrasonic examinations on the pressurizer inside radius sections for Turkey Point 3 and 4.

RAI-2

Regarding RR-16, Examination Category R-A, Item R1.11, Risk Informed Piping Examinations:

In Attachment 2 of the application, page 5 of 31, the weld identifier for the reactor coolant reducer-to-valve weld is listed as 3"-RC-1301-1. In the Table of Attachment 2 (page 11 of 31) and corresponding Figure 18 (page 30 of 31), the weld identifier for this reducer-to-valve weld is listed as 3"-RC-1305-1. Please clarify the correct identifier for this weld.

RAI-3

The following issues were identified as possible editorial errors in RR-16 and RR-17. Please confirm whether the issues identified below are errors, and if so, please provide the corrected text.

- a. Regarding RR-16, Exam Category C-F-1, Item C5.11, Weld ID 14"-RHR-2305-3: In the Table (page 10 of 31 of Attachment 2), "16" is listed as the corresponding figure number. On page 28 of 31 of Attachment 2, is the figure number incorrectly labeled as "18"?
- b. Regarding RR-17, Exam Category C-F-1, Item C5.21 Weld ID 3"-SI-2403-35: In the Table (page 8 of 35 of Attachment 3), should Figure 11 be deleted as a corresponding figure? It appears that only Figure 6 applies to this weld.
- c. Regarding RR-17, Exam Category C-F-1, Item C5.21, Weld ID 3"-SI-2403-36: There is a description of why the surface examination is not 100 percent for this weld under RR 16, page 5 of 31 of Attachment 2. Should this description be located in RR-17, page 5 of 35 of Attachment 3, instead?

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