

NRR-PMDAPEm Resource

From: Klett, Audrey
Sent: Thursday, October 01, 2015 10:34 AM
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 Units 3 and 4 Relief Request 2 for 5th 10-year ISI Intervals (TACs MF6384 and MF6385)

Hi Mitch,

By application dated June 8, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15177A085), Florida Power & Light Company (the licensee) submitted Relief Request 2 (RR-2) for the fifth 10-year inservice inspection intervals for Turkey Point Nuclear Generating Unit Nos. 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. Olga Hanek of the licensee's staff on October 1, 2015, the NRC staff is requesting the licensee's response to the RAI within 45 days of this email.

RAI-1

The staff notes that RR-2 is a request for approval of an alternative with an acceptable level of quality and safety, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, Paragraph 50.55a(z)(1). However, the discussion in Section 4, "Reason for Request," of the application appears to be a description of hardship, which is pursuant to 10 CFR 50.55a(z)(2). The staff notes that the precedent dated March 3, 2005 (ADAMS Accession No. ML050350363), which is referenced in the application, contains a safety evaluation of the same alternative during the previous (i.e., fourth) ten-year interval for the same regenerative heat exchanger shell welds, support welds, and component supports, and that the alternative was authorized pursuant to 10 CFR 50.55a(a)(3)(ii) (now 10 CFR 50.55a(z)(2)). The staff requests the licensee to confirm that RR-2 should be considered pursuant to 10 CFR 50.55a(z)(2) instead of 10 CFR 50.55a(z)(1).

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301-415-0489

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