



SEP 25 2015

L-2015-226
10 CFR 50.55a

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

RE: Turkey Point Unit 3 and Unit 4
Docket Nos. 50-250 and 50-251
Fourth 10-Year Inservice Inspection Interval
Response to Request for Additional Information for Relief Requests Nos.16 and 17

By letter L-2015-020, dated February 13, 2015 (Agency-wide Documents Access and Management System (ADAMS), Accession No. ML15062A279), Florida Power & Light Company (FPL) submitted Relief Requests Relief Requests 16 and 17 (RR-16 and RR-17) for the Fourth Inservice Inspection (ISI) Interval for Turkey Point Nuclear Units 3 and 4.

The Nuclear Regulatory Commission (NRC) Staff reviewed RR-16 and RR-17 and identified areas where they need additional information and clarification in order to complete their review.

On September 1, 2015, Ms. Audrey Klett, NRC Project Manager for Turkey Point Units 3 and 4 provided the request for additional information (RAI) via electronic mail and requested the response to these RAI questions by October 1, 2015.

The enclosure to this letter contains the NRC's Request for Additional Information (RAI) questions for RR-16 and RR-17, and the corresponding FPL responses.

If there are any questions regarding this request, please contact Mr. Mitch Guth, Turkey Point Licensing Manager, at (305) 246-6698.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Summers", written over a horizontal line.

Thomas Summers
Site Vice-President
Turkey Point Nuclear Plant

Enclosure

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

AB47
NRR

FPL Letter L-2015-226

ENCLOSURE

Florida Power & Light Company
Turkey Point Units 3 and 4
Fourth Ten-Year Inservice Inspection Interval
Relief Requests 16 and 17
Responses to NRC
Request for Additional Information (RAI)
Questions

NRC 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.

FPL Response to RAI-1:

A visual examination was not performed. A visual examination was considered; however, the spray nozzle assembly configuration inside the pressurizer prohibits access for examination.

NRC 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.

FPL Response to RAI-2

The correct identifier for this weld is 3"-RC-1305-1.

NRC 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?

FPL Response to RAI-3a

Yes, the figure on page 28 of 31 should be labeled Figure 16.

FPL Response to RAI-3b

Yes, the figure on page 8 of 35 should be labeled Figure 6.

FPL Response to RAI-3c

Yes, the description should be located in RR-17, page 5 of 35 of Attachment 3.