



NOV 13 2015

L-2015-275
10 CFR 50.55a

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

RE: Florida Power and Light Company
Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Fifth Ten-Year Inservice Inspection (ISI)
Response to Request for Additional Information (RAI) for Relief Request No. 2

By letter L-2015-100, dated June 8, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15177A085), Florida Power & Light Company (FPL) 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 subject relief was requested from the Code required examinations on the Regenerative Heat Exchanger shell welds, support welds, and component supports.

On October 1, 2015, via electronic mail, Ms. Audrey Klett, NRC Project Manager for Turkey Point Units 3 and 4, requested additional information regarding RR-2.

The Attachment to this letter contains the NRC's Request for Additional Information (RAI) question and the corresponding FPL response.

If you have any questions or require additional information, please contact Mr. Mitch Guth, Licensing Manager, at (305) 246-6698.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Summers', with a long horizontal line extending to the right.

Thomas Summers
Site Vice President
Turkey Point Nuclear Plant

Attachment

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

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**FPL Letter
L-2015-275**

Attachment

Florida Power & Light Company

**Turkey Point Nuclear Plant
Units 3 and 4**

Response to NRC Request for Additional Information (RAI)

Relief Request No. 2

NRC 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 March 3, 2005, precedent (ADAMS Accession No. ML050350363) referenced in the application is 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).

FPL Response to RAI-1:

FPL confirms that RR-2 should be considered pursuant to 10 CFR 50.55a(z)(2) instead of 10 CFR 50.55a(z)(1).