NRR-PMDAPEm Resource

From: Klett, Audrey
Sent: Monday, November 16, 2015 1:44 PM
To: 'Mitch.Guth@fpl.com'
Cc: 'Mihalakea, Stavroula' (Stavroula.Mihalakea@fpl.com); 'Hanek, Olga' (Olga.Hanek@fpl.com)
Subject: Revised Due Date for Request for Additional Information re. Turkey Point Units 3 and 4 Relief Request 3 for 5th 10-year ISI Intervals (TACs MF6386 and MF6387)

Hi Mitch,

As discussed with Stavy this morning, the NRC staff is requesting a response to the RAI in the email thread below on or by December 7, 2015. If you have any questions, please call me.

-Audrey

From: Klett, Audrey
Sent: Friday, November 13, 2015 4:50 PM
To: 'Mitch.Guth@fpl.com'
Cc: 'Mihalakea, Stavroula' (Stavroula.Mihalakea@fpl.com) ; 'Hanek, Olga' (Olga.Hanek@fpl.com)
Subject: RE: Request for Additional Information re. Turkey Point Units 3 and 4 Relief Request 3 for 5th 10-year ISI Intervals (TACs MF6386 and MF6387)

Hi Mitch,
Per discussions with Olga and Stavy today, I understand that FPL needs additional time to respond to the RAI in the email thread below. Your staff proposed a new RAI response date of December 7, 2015. NRC staff is considering the request and will contact your staff soon about a revised RAI due date. As such, I will not expect FPL's RAI response on November 16, 2015.

-Audrey

From: Klett, Audrey
Sent: Thursday, October 01, 2015 11:02 AM
To: 'Mitch.Guth@fpl.com' <Mitch.Guth@fpl.com>
Cc: 'Mihalakea, Stavroula' (Stavroula.Mihalakea@fpl.com) <Stavroula.Mihalakea@fpl.com>; 'Hanek, Olga' (Olga.Hanek@fpl.com) <Olga.Hanek@fpl.com>
Subject: Request for Additional Information re. Turkey Point Units 3 and 4 Relief Request 3 for 5th 10-year ISI Intervals (TACs MF6386 and MF6387)

Hi Mitch,

By application dated June 8, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15181A251), Florida Power & Light Company (FPL, the licensee) submitted Relief Request No. 3 (RR-3) for the fifth 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. 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

RR-3, Section 4, "Reason for Request," states, in part, that Turkey Point Units 3 & 4 are required to perform VT-3 examination on Class 1, 2 and 3 supports including attachment hardware per American Society of Mechanical Engineers (ASME) Section XI and that Turkey Point 3 and 4 are also required to perform visual examination and testing in accordance with ASME operations manager (OM) Code, Subsection ISTD. The licensee's application also states that in order to perform snubber examination and testing (ISTD) and visual VT-3 of snubber attachment hardware (ASME Section XI), FPL has consolidated the Section XI and OM code requirements in the plant Snubber Program. The visual examinations of snubbers is included in Surveillance Procedure No. 0-OSP-105-1, "Visual inspection, Removal and Reinstallation of Mechanical Shock Arrestors."

(a) Please verify and confirm that the proposed visual examination criteria of the Snubber Program will be identical to the VT-3 visual examination per IWA-2213 (IWA-2213(a) thru IWA-2213(g)) of ASME Section XI, 2007 Edition with 2008 Addenda.

(b) The relief request did not mention details about hydraulic snubbers and the proposed update of the procedure is related to mechanical snubbers. Please verify that hydraulic snubbers are not installed at Turkey Point 3 and 4, or hydraulic snubber procedures will be revised to add the VT-3 requirements.

(c) Please provide the ASME Code that is currently is being used in the Turkey Point 3 and 4, Surveillance Procedure No. 0-OSP-105-1, before consolidation of snubbers examination and its attachments during fifth 10-year ISI interval.

RAI-2

In RR-3, the third bullet of the "Reason for Request" section states that Turkey Point will perform visual examination of 100% of the non-exempt Code Class 1, 2 and 3 snubbers in accordance with the visual inspection frequency required per the ASME OM Code. Please provide the basis to exempt snubbers from the visual examination requirements.

RAI-3

Please verify if ASME OM Code Case OMN-13 is being used to extend the visual examination interval up to 10 years. While using Code Case OMN-13 for snubbers during the extended interval of 10 years, if the number of unacceptable snubbers (pin-to-pin) exceeds the ISTD-4252-1 limits (these unacceptable snubbers can be found during non-inspection activities such as walkdowns or any other events i.e. water hammer, etc.), what action will be taken and how will these findings align with the examination of snubbers associated attachment hardware (pin-to-pipe and pin-to-structure, excluding integral attachments).

RAI-4

IWF-2430(a) states, in part, that component supports examinations performed in accordance with Table IWF-2500-1 that reveal flaws or relevant conditions exceeding the acceptance standards of IWF-3400, and that require corrective measures, shall be extended, during the current outage, to include the component supports immediately adjacent to flawed supports. Please explain how this situation (to include supports adjacent to flawed supports) will be considered, while using the proposed relief request to perform the visual examination of snubbers (pin-to-pin) and associated attachment hardware (pin-to-pipe and pin-to-structure, excluding integral attachments). (Note: The adjacent flawed component supports could be a support or a snubber).

RAI-5

In RR-3, the second paragraph of Section 5, "Proposed Alternative," states, in part, that program administration and tracking … ISTD will be applied to the balance of support balance and that the ASME OM Code frequency of examination requires a minimum frequency of 100% per 10 years, which exceeds the requirement for ASME

Section XI. Please explain the statement, “The ASME OM Code frequency of examination requires a minimum frequency of 100% per 10 years which exceeds the requirement for ASME Section XI.”

RAI-6

In the RR-3, Section 5, “Proposed Alternative,” FPL references Turkey Point 3 and 4 Procedure 0-OSP-105-1. In the first paragraph, this procedure is written as Snubber Surveillance Procedure, 0-OSP-105-1, “Visual Inspection, Removal and Reinstallation of Mechanical Shock Arrestors.” Whereas, in the fifth paragraph, this procedure is written as Turkey Point, Quality Operations Surveillance Procedure No. 0-OSP-105-1, “Visual Inspection, Removal and Reinstallation of Mechanical Shock Arrestors.” Please explain the difference between these two descriptions provided for Procedure No. 0-OSP-105-1, and provide a copy of the Procedure No. 0-OSP-105-1.

RAI-7

The contents of the referenced precedence documents listed in the application, Section 7, “Precedents,” appear to not be related to the submitted relief request No. 3. Please verify and revise as appropriate.

Audrey Klett
Project Manager
NRR/DORL/LPLII-2
301-415-0489

Hearing Identifier: NRR_PMDA
Email Number: 2651

Mail Envelope Properties (Audrey.Klett@nrc.gov20151116134400)

Subject: Revised Due Date for Request for Additional Information re. Turkey Point Units 3 and 4 Relief Request 3 for 5th 10-year ISI Intervals (TACs MF6386 and MF6387)
Sent Date: 11/16/2015 1:44:10 PM
Received Date: 11/16/2015 1:44:00 PM
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Tracking Status: None

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Files	**Size**	**Date & Time**
MESSAGE	7121	11/16/2015 1:44:00 PM

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Priority: Standard
Return Notification: No
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Expiration Date:
Recipients Received: