

NRR-PMDAPem Resource

From: Klett, Audrey
Sent: Tuesday, March 01, 2016 10:17 AM
To: 'Mitch.Guth@fpl.com'
Cc: 'Hanek, Olga' (Olga.Hanek@fpl.com)
Subject: Request for Additional Information re. Turkey Point Unit 3 and 4 LAR 237 (CACs MF6148 and MF6149)

Hi Mitch,

By application dated April 16, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15119A222), as supplemented by letter dated December 7, 2015 (ADAMS Accession No. ML15351A406), Florida Power & Light Company (FPL, the licensee) submitted License Amendment Request No. 237 for Turkey Point Nuclear Generating Unit Nos. 3 and 4. By emails dated October 16, and November 30, 2015 (ADAMS Accession Nos. ML15290A001 and ML15335A003), the U.S. Nuclear Regulatory Commission (NRC) staff sent FPL a request for additional information (RAI). By letter dated December 7, 2015, FPL responded to the RAI. The staff reviewed the application and the supplement and identified areas where it needs additional information to support its review. The RAI is provided below. The RAI numbers continue sequentially from the RAI dated October 16, 2015. As discussed with Ms. Olga Hanek of the licensee's staff on February 24, 2016, the NRC is requesting a response to the RAI by March 31, 2016.

EICB RAI-4

The December 7, 2015, FPL response to the staff's RAI dated October 15, 2015, was responsive, but the staff's development of a documented safety evaluation necessitates this request for more detailed information from the total loop uncertainty (TLU) calculation. The following TLU calculation information is requested:

- a. Describe the methodology used for the calculation, including whether FPL used Regulatory Guide (RG) 1.105 and ISA 67.04.01. If FPL is using a plant specific methodology, then describe whether the method is based on a combination of the random, the non-random, and the bias errors, and how the methodology meets the intent of RG 1.105.
- b. Describe the changes in assumptions since the last revision of the calculation.
- c. Describe the type(s) of errors considered, and how the errors are combined. In particular, describe all the process errors and how they are calculated and combined. Include construction errors, specific gravity errors (item B(PC1) of equation 21 of the calculation discussed during the draft RAI clarification teleconference held on January 28, 2016), and any other errors.
- d. Provide the calculated error for each loop device (e.g., level transmitter, rack error, and indicator).
- e. Provide the TLU calculation (i.e., equations 20 to 26 of the calculation discussed during the draft RAI clarification teleconference held on January 28, 2016). What is the calculated TLU value?
- f. Provide an explanation of how the boric acid solution specific gravity is accounted for in the required and the available levels.
- g. Describe what measures are taken to assure consistency of specific gravity between the three boric acid storage tanks (BASTs).

EICB RAI-5

Because all three BASTs are interconnected creating a common tank, the staff requests information regarding the relative elevations of the BASTs.

a. Are the tanks at the same elevation?

b. Is the tank interconnection at a level that does not affect the accuracy of the level measurement system? Please provide detail to support the answer.

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