

## **NRR-PMDAPem Resource**

---

**From:** Klett, Audrey L  
**Sent:** Monday, June 27, 2016 9:07 AM  
**To:** 'Mitch.Guth@fpl.com'  
**Cc:** 'Hanek, Olga' (Olga.Hanek@fpl.com); 'Mihalakea, Stavroula' (Stavroula.Mihalakea@fpl.com); Czaya, Paul (Paul.Czaya@fpl.com)  
**Subject:** Request for Additional Information - Turkey Point 3 & 4 - 5th 10-Year ISI RR#4 (CACs MF7277 & MF7278)

Hi Mitch,

By letter L-2016-006 dated January 14, 2006 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16033A355), Florida Power & Light Company (FPL, the licensee) submitted Relief Request (RR) No. 4, which requests approval of a Risk Informed Inservice Inspection (RI-ISI) program for use during the fifth ten-year inservice inspection (ISI) interval at Turkey Point Nuclear Generating Unit Nos. 3 and 4. The program is a risk-informed Inservice Inspection Program (RI-ISI) for Class 1 and 2 piping based on Electric Power Research Institute (EPRI) Topical Report (TR) 112657 Revision B-A, "Revised Risk-Informed Inservice Evaluation Procedure," dated June 2012.

The U.S. Nuclear Regulatory Commission's (NRC's) Component Performance, NDE, and Testing Branch (EPNB) and PRA Licensing Branch (APLA) 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 June 21, 2016, the NRC is requesting the licensee to respond to the RAI on or by July 29, 2016.

### **RAI-EPNB-1**

EPRI TR 112657 Revision B-A (Section 3.6.4.2) and Section 3.5 of the submittal dated January 14, 2016, both state that 25% of high risk elements and 10% of medium risk elements will be selected for examination. Table 3.5 of the submittal dated January 14, 2016, appears to indicate that the elements selected for examination are well below these percentages. The NRC staff requests FPL to explain this discrepancy.

### **RAI-EPNB-2**

The NRC staff noted there appears to be discrepancies between the numbers shown in Table 3.5 and the other tables in the submittal dated January 14, 2016. For example, for Unit 3, Table 3.5 shows there are 164 "High Risk" (Categories 1, 2 and 3) elements and 572 "Medium Risk" (Categories 4 and 5) elements these do not match numbers shown in Tables 5.1.1 and 5.2.1. Similar discrepancies were noted for Unit 4 in Tables 3.5, 5.2.1 and 5.2.2. The NRC staff requests FPL to explain the differences or supply corrected Tables.

### **RAI-EPNB-3**

EPRI TR 112657 Revision B-A (Section 3.6.4.2) and Section 3.5 of the submittal dated January 14, 2016, both state that if the percentage of Class 1 piping locations selected for examination falls substantially below 10%, then the basis for the low percentage shall be investigated. The submittal states the percentage of Class 1 welds selected per the RI-ISI process was 6.8% (54 of 789 welds) in Unit 3 and 6.9% (57 of 825 welds) in Unit 4. The licensee stated the 6.8% and 6.9% were not an extreme departure from 10%. However, the NRC staff notes that these percentages result in a greater than 30% reduction in the number of Class 1 welds to be examined: 54 versus 79 for Unit 3, and 57 versus 83 for Unit 4. The EPRI TR explains how the number of Class 1 welds can drop below 10% because of a high number of Class 1 segments being assigned to low risk categories. The NRC staff was unable to determine if this is the case with the licensee's submittal with the

tables provided because of the mixing of Class 1 & 2 segments in the tables. The NRC staff requests FPL to provide further justification for the low percentage of Class 1 welds selected.

#### **RAI-EPNB-4**

Of the welds not selected for future examinations in the RI-ISI program or FPL's augmented inspection programs, have previous examinations of any of these welds identified service induced degradation? If so, then what was the degradation mechanism, and what was done to mitigate the degradation?

#### **RAI-EPNB-5**

Have any of the welds selected for examination in the RI-ISI been previously examined and resulted in limited examination coverage (i.e. less than 90%)? If so, the NRC staff requests FPL to explain why other welds have not been selected to minimize the number of examinations with limited exam coverage.

#### **RAI-APLA-1**

In its submittal dated January 14, 2016, the licensee provided a list of Facts and Observations (F&Os) including DA-D5-01, and DA-D6 in Table 3, "Turkey Point PRA Model – SRs Not Met," with their associated supporting requirements (SRs) that do not meet the American Society of Mechanical Engineers (ASME)/American Nuclear Society (ANS) probabilistic risk assessment standard (ASME/ANS RA-Sa-2009) Capability Categories (CCs). Table 2-2 of EPRI TR 1021467-A, "Nondestructive Evaluation: Probabilistic Risk Assessment Technical Adequacy Guidance for Risk-Informed In-Service Inspection Programs," assigns CC-I to SRs DA-D6 and DA-D5 for RI-ISI applications using the EPRI traditional RI-ISI approach.

The NRC staff requests FPL to explain whether the F&Os associated with SRs DA-D5 and DA-D6 have been dispositioned and whether those SRs meet CC-I following the F&Os disposition. If those F&Os have not been dispositioned, then the NRC staff requests FPL to justify why not meeting CC-I (for those SRs) will not impact the RI-ISI application.

**Hearing Identifier:** NRR\_PMDA  
**Email Number:** 2917

**Mail Envelope Properties** (Audrey.Klett@nrc.gov20160627090600)

**Subject:** Request for Additional Information - Turkey Point 3 & 4 - 5th 10-Year ISI RR#4  
(CACs MF7277 & MF7278)

**Sent Date:** 6/27/2016 9:06:33 AM

**Received Date:** 6/27/2016 9:06:00 AM

**From:** Klett, Audrey L

**Created By:** Audrey.Klett@nrc.gov

**Recipients:**

"Hanek, Olga' (Olga.Hanek@fpl.com)" <Olga.Hanek@fpl.com>

Tracking Status: None

"Mihalakea, Stavroula' (Stavroula.Mihalakea@fpl.com)" <Stavroula.Mihalakea@fpl.com>

Tracking Status: None

"Czaya, Paul (Paul.Czaya@fpl.com)" <Paul.Czaya@fpl.com>

Tracking Status: None

"Mitch.Guth@fpl.com" <Mitch.Guth@fpl.com>

Tracking Status: None

**Post Office:**

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	5007	6/27/2016 9:06:00 AM

**Options**

**Priority:** Standard

**Return Notification:** No

**Reply Requested:** No

**Sensitivity:** Normal

**Expiration Date:**

**Recipients Received:**