

NRR-PMDAPem Resource

From: Klett, Audrey
Sent: Thursday, August 11, 2016 2:40 PM
To: 'Mitch.Guth@fpl.com'
Cc: 'Hanek, Olga' (Olga.Hanek@fpl.com); Czaya, Paul (Paul.Czaya@fpl.com)
Subject: Request for Additional Information - Turkey Point 3 & 4 - LAR-242 (CACs MF7557 & MF7558)

Hi Mitch,

By letter L-2016-055 dated April 4, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16110A266), Florida Power & Light Company (FPL, the licensee) submitted License Amendment Request (LAR) 242 for Turkey Point Nuclear Generating Unit Nos. 3 and 4 (Turkey Point 3 and 4). The licensee requested to revise the Technical Specifications (TSs) for snubbers to conform to the licensee's Snubber Testing Program. The U.S. Nuclear Regulatory Commission (NRC) staff determined that it needs additional information to complete its review of the LAR. The staff's request for additional information (RAI) is below. As discussed with Mr. Paul Czaya of the licensee's staff on August 11, 2016, the NRC staff requests a response to the RAI within 30 days of the date of this email.

RAI 1

Section 4.1 of the LAR Enclosure, "Evaluation of Proposed Change," page 3 of 7, second paragraph, states, "Currently, snubber testing and examination are performed in accordance with specific requirements of TS 3/4.7.6 and ASME OM Code Subsection ISTA and ISTD, 1998 Edition with addenda through 2000." For Turkey Point 3 and 4, the fifth 10-year inservice inspection intervals started on February 22, 2015, and April 15, 2015, respectively. Historically, the licensee used TS 3/4.7.6 at Turkey Point 3 and 4 for snubber examination and testing. The staff requests the licensee to provide the date(s) when it started using ASME OM Code Subsection ISTA and ISTD, 1998 Edition with addenda through 2000, for Turkey Point Units 3 and 4.

RAI 2

Attachment 1, "Technical Specification Mark-up," of the LAR, page 3/4 7-22, provides a marked-up version of TS 3.7.6 ACTION as follows, with proposed additions in bold italicized text and deletions in stricken text:

With one or more snubbers inoperable on any system, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and ***determine the impact*** ~~perform an engineering evaluation per Specification 4.7.6.f~~ on the attached component or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

With the deletion of the reference to SR 4.7.6.f, which essentially explains how to determine the impact of an inoperable snubber, it is not clear to the staff the criteria the licensee would use to determine the impact of an inoperable snubber. Therefore, the staff requests the licensee to explain how it would determine the impact of an inoperable snubber per the proposed ACTION statement given that it doesn't reference the Snubber Testing Program (i.e., TS 4.7.6, which refers to TS 6.8.4.m).

RAI 3

Attachment 1 of the LAR, page 3/4 7-22, shows the licensee's proposal to revise SR 4.7.6 by adding a reference to the newly added TS 6.8.4.m, "Snubber Testing Program," as follows, with proposed additions in bold italicized text and deletions in stricken text:

Each snubber shall be demonstrated OPERABLE by performance of the ~~following augmented inservice inspection~~ **Snubber Testing Program in Specification 6.8.4.m** in addition to the requirements of Specification 4.0.5.

The staff requests the licensee to clarify the use of TS 4.0.5 along with newly added TS 6.8.4.m. Please confirm whether these TSs are duplicative and/or if TS 6.8.4.m encompasses all requirements of TS 4.0.5.

RAI 4

Attachment 1 of the LAR, page 6-14, shows the proposed TS 6.8.4.m, item 2, which states:

The program shall meet the requirements for ISI of supports set forth in subsequent editions of the Code of Record and addenda of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (BPV) Code and the ASME Code for Operation and Maintenance of Nuclear Power Plants (OM Code) that are incorporated by reference in 10 CFR 50.55a(b) subject to limitations and modifications listed in 10 CFR 50.55a(b) and subject to Commission approval [emphasis added].

The staff notes that 10 CFR 50.55a was revised such that 10 CFR 50.55a(a) rather than 10 CFR 50.55a(b) provides the documents approved for incorporation by reference and that the “limitations and modifications” of 10 CFR 50.55a(b) are now referred to as “conditions.” The staff requests the licensee to either reflect these changes in its proposal or justify the currently proposed phrasing.

RAI 5

Attachment 3, “Snubber Testing Program Plan,” of the LAR, page 1 of 6 (i.e., the cover page) shows that the program is applicable for the Turkey Point 3 and 4 fifth 10-year intervals. The staff requests the licensee to clarify whether it is proposing that the Snubber Testing Program is applicable only for the fifth 10-year inservice testing (IST) intervals at Turkey Point 3 and 4.

RAI 6

Attachment 3 of the LAR, Section 7.2 states, “Controlled listings of the snubbers which are included in this program are maintained and controlled within the 0-OSP-105.1 and 0-OSP-105.2.”

- (a) The staff requests the licensee to explain any differences between the controlled snubber listings in 0-OSP-105.1 and 0-OSP-105.2.
- (b) The staff requests the licensee to explain whether it has used the criteria of ASME Section XI, IWF-1230 to exempt snubbers while developing the controlled listings of snubbers in 0-OSP-105.1 and 0-OSP-105.2.

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