



September 1, 2016
L-2016-172
10 CFR 50.90

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555-0001

Re: Turkey Point Nuclear Plant, Units 3 and 4
Docket Nos. 50-250 and 50-251

Response to Request for Additional Information Regarding License Amendment Request
242, Changes to Snubber Surveillance Requirements, Snubber Testing Program Plan –
Fifth Inspection Interval

References:

1. Florida Power & Light Company letter L-2016-055, "License Amendment Request 242, Changes to Snubber Surveillance Requirements, Snubber Testing Program Plan – Fifth Inspection Interval," April 4, 2016 (ML16110A266)
2. NRC E-mail "Request for Additional Information - Turkey Point 3 & 4 - LAR-242 (CACs MF7557 & MF7558)," August 11, 2016 (ML16228A004)

In Reference 1, Florida Power & Light Company (FPL) submitted license amendment request (LAR) 242 for Turkey Point Units 3 and 4. The proposed amendment would revise Technical Specification (TS) 3/4.7.6, Snubbers, to conform with the Snubber Testing Program. The Snubber Testing Program implements Subsection ISTD, "Preservice and Inservice Examination and Testing of Dynamic Restraints (Snubbers) in Light-Water Reactor Nuclear Power Plants," of the ASME OM Code, 2004 Edition with 2005 and 2006 Addenda.

In Reference 2, the NRC staff requested additional information to complete its review of LAR 242. The enclosure to this letter provides the FPL response to the NRC staff's request.

Attachment 1 to the enclosure provides markups of the TS showing revisions to the proposed changes. These markups supersede the corresponding markups provided in Reference 1. Attachment 2 provides proposed changes to the Bases for TS 3/4.7.6 and are provided for information only.

This response does not alter the conclusion in Reference 1 that the changes do not involve a significant hazards consideration pursuant to 10 CFR 50.92, and there are no significant environmental impacts associated with the changes.

No new or revised commitments are included in this letter.

AD47
NRR

Should you have any questions regarding this submission, please contact Mr. Mitch Guth, Licensing Manager, at 305-246-6698.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 1, 2016

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

Enclosure

cc: NRC Regional Administrator, Region II
NRC Senior Resident Inspector
NRC Project Manager
Ms. Cindy Becker, Florida Department of Health

ENCLOSURE

Response to Request for Additional Information Regarding License Amendment Request 242
Changes to Snubber Surveillance Requirements
Snubber Testing Program Plan – Fifth Inspection Interval

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.

FPL Response

The statement quoted above is incorrect. It should have stated: Currently, snubber testing and examinations are performed in accordance with specific requirements of TS 3/4.7.6, ASME OM Code ISTA and ISTD 2004 Edition with Addenda through 2006, and ASME Section XI, 2007 Edition with 2008 Addenda (attachments).

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).

FPL Response

FPL's intent is to perform the evaluation in accordance with the Snubber Testing Program. To provide clarity the proposed change to the ACTION is revised as follows:

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 **by evaluation in accordance with Specification 4.7.6**, or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

The revision to the proposed change is shown on the TS mark-up in Attachment 1 for page 3/4 7-22.

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.

FPL Response

TS 6.8.4.m and TS 4.0.5 are duplicative with respect to snubbers. FPL has proposed to delete reference to TS 4.0.5 in TS 4.7.6 via a separate license amendment application (Reference 1) consistent with Technical Specifications Task Force traveller TSTF-545, Revision 3, "TS Inservice Testing Program Removal & Clarify SR Usage Rule Application to Section 5.5 Testing."

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.

FPL Response

FPL hereby revises the proposed wording in TS 6.8.4.m, Item 2, to reflect the appropriate 10 CFR 50.55a(a) section for incorporated references and the revised wording of 10 CFR 50.55a(b) as follows:

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(a) subject to the use and conditions on the use of standards listed in 10 CFR 50.55a(b) and subject to Commission approval.

A revision to the original mark-up reflecting the changes above is contained in Attachment 1.

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.

FPL Response

The proposed Snubber Testing Program is only applicable for the fifth 10-year intervals for Turkey Point Units 3 and 4. Note that the fifth 10-year interval end dates for Turkey Point should be in 2025 not 2024, i.e. February 21, 2025 for Unit 3 and April 14, 2025 for Unit 4. The fifth 10-year intervals for the Inservice Testing Program were established in FPL letter L-2016-139 dated July 6, 2016 (Reference 2). The Snubber Testing Program Plan will be revised to reflect the correct end dates.

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.

FPL Response

- (a) The snubber lists in procedures 0-OSP-105.1, Visual Inspection, Removal and Reinstallation of Snubbers, and 0-OSP-105.2, Functional Testing for Snubbers, are complete with the required snubbers but the lists differ based on the activity governed by the procedure. In procedure 0-OSP-105.1 the snubbers are listed as either accessible or inaccessible during power operation. In procedure 0-OSP-105.2 the snubbers are listed as either safety-related or non-safety-related.
- (b) FPL has not used the criteria of ASME Section XI, IWF-1230 to exempt snubbers while developing the controlled listings of snubbers in procedures 0-OSP-105.1 and 0-OSP-105.2.

References

1. NextEra Energy/Florida Power & Light Company letter L-2016-137: "Application to Revise Technical Specifications to Adopt TSTF-545, Revision 3, "TS Inservice Testing Program Removal & Clarify SR Usage Rule Application to Section 5.5 Testing," and to Request an Alternative to the ASME Code," July 28, 2016 (ML16214A276)
2. Florida Power & Light Company letter L-2016-139: "Fifth 10-Year Interval, Inservice Testing (IST) Program Plan," July 6, 2016 (ML16202A067)

Attachments

1. Revised Markup of the Technical Specifications
2. Proposed Technical Specification Bases Changes (Information Only)

ATTACHMENT 1

Revised Markup of the Technical Specifications

(2 pages follow)

PLANT SYSTEMS

3/4.7.6 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.6 All snubbers shall be OPERABLE. The only snubbers excluded from the requirements are those installed on nonsafety-related systems and then only if their failure or failure of the system on which they are installed would have no adverse effect on any safety-related system.

APPLICABILITY: MODES 1, 2, 3, and 4. MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES.

ACTION:

With one or more snubbers inoperable on any system, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and ~~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.~~

determine the impact

by evaluation in accordance with Specification 4.7.6,

Snubber Testing

SURVEILLANCE REQUIREMENTS

4.7.6 Each snubber shall be demonstrated OPERABLE by performance of the ~~following augmented inservice inspection program in addition to the requirements of Specification 4.0.5.~~

capitalize

a-

Inspection Types

Specification 6.8.4.m in

As used in this specification, type of snubber shall mean snubbers of the same design and manufacturer, irrespective of capacity.

b-

Visual Inspections

~~Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these categories (inaccessible and accessible) may be inspected independently according to the schedule determined by Table 4.7-2. The visual inspection interval for each type of snubber shall be determined based upon the criteria provided in Table 4.7-2 and the first inspection interval determined using this criteria shall be based upon the previous inspection interval as established by the requirements in effect before Amendment 151 and 146.~~

c-

Visual Inspection Acceptance Criteria

~~Visual inspections shall verify that: (1) the snubber has no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are secure, and (3) fasteners for attachment of the snubber to the component and to the snubber anchorage are secure. Snubbers which appear inoperable as a result of visual~~

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

I. Surveillance Frequency Control Program

This program provides controls for Surveillance Frequencies. The program shall ensure that Surveillance Requirements specified in the Technical Specifications are performed at intervals sufficient to assure the associated Limiting Conditions for Operations are met:

- a. The Surveillance Frequency Control Program shall contain a list of frequencies of those Surveillance Requirements for which the frequency is controlled by the program.
- b. Changes to the frequencies listed in the Surveillance Frequency Control Program shall be made in accordance with NEI 04-10, "Risk-Informed Method for Control of Surveillance Frequencies," Revision 1.
- c. The provisions of Surveillance Requirements 4.0.2 and 4.0.3 are applicable to the frequencies established in the Surveillance Frequency Control Program.

m. →
6.8.5 DELETED ←

Snubber Testing Program

This program conforms to the examination, testing and service life monitoring for dynamic restraints (snubbers) in accordance with 10 CFR 50.55a inservice inspection (ISI) requirements for supports. The program shall be in accordance with the following:

- 1. This program shall meet 10 CFR 50.55a(g) ISI requirements for supports.
- 2. 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(a) subject to the use and conditions on the use of standards listed in 10 CFR 50.55a(b) and subject to Commission approval.
- 3. The program shall, as required by 10 CFR 50.55a(b)(3)(v), meet Subsection ISTA, "General Requirements" and Subsection ISTD, "Preservice and Inservice Examination and Testing of Dynamic Restraints (Snubbers) in Light-Water Reactor Nuclear Power Plants".
- 4. The 120-month program updates shall be made in accordance with 10 CFR 50.55a(g)(4), 10 CFR 50.55a(g)(3)(v) and 10 CFR 50.55a(b) (including 10 CFR 50.55a(b)(3)(v)) subject to the conditions listed therein.

ATTACHMENT 2

Proposed Bases Changes (Information Only)

(2 pages follow)

REVISION NO.:

18

PROCEDURE TITLE:

TECHNICAL SPECIFICATION BASES CONTROL PROGRAM

PAGE:

175 of 211

PROCEDURE NO.:

0-ADM-536

TURKEY POINT PLANT

ATTACHMENT 2
Technical Specification Bases
(Page 158 of 194)

3/4.7.6 Snubbers

All snubbers are required OPERABLE to ensure that the structural integrity of the Reactor Coolant System and all other safety-related systems is maintained during and following a seismic or other event initiating dynamic loads.

Snubbers are demonstrated OPERABLE by performance of the Snubber Testing Program.

~~The visual inspection frequency is based upon maintaining a constant level of snubber protection to each safety related system during an earthquake or severe transient. Therefore, the required inspection interval varies inversely with the observed snubber failures and is determined by the number of inoperable snubbers found during an inspection. Inspections performed before that interval has elapsed may be used as a new reference point to determine the next inspection. However, the results of such early inspections performed before the original required time interval has elapsed (nominal time less 25%) may NOT be used to lengthen the required inspection interval. Any inspection whose results require a shorter inspection interval will override the previous schedule.~~

~~When the cause of the rejection of a snubber is visual inspection is clearly established and remedied for the snubber and for any other snubbers that may be generically susceptible, and verified operable by inservice functional testing, that snubber may be exempted from being counted as inoperable for the purposes of establishing the next visual inspection interval. Generically susceptible snubbers are those which are of a specific make or model and have the same design features directly related to rejection of the snubber by visual inspection, or are similarly located or exposed to the same environmental conditions such as temperature, radiation, and vibration.~~

When a snubber is found inoperable, an evaluation is performed, in addition to the determination of the snubber mode of failure, in order to determine if any Safety Related System or component has been adversely affected by the inoperability of the snubber. The evaluation shall determine whether or NOT the snubber mode of failure has imparted a significant effect or degradation on the supported component or system.

and

in accordance with the Snubber Testing Program

REVISION NO.: 18	PROCEDURE TITLE: TECHNICAL SPECIFICATION BASES CONTROL PROGRAM	PAGE: 176 of 211
PROCEDURE NO.: 0-ADM-536	TURKEY POINT PLANT	

ATTACHMENT 2
Technical Specification Bases
(Page 159 of 194)

3/4.7.6 (Continued)

~~To provide assurance of snubber functional reliability, a representative sample of the installed snubbers will be functionally tested during plant refueling SHUTDOWNS. Observed failure of these sample snubbers shall require functional testing of additional units. In cases where the cause of the functional failure has been identified additional testing shall be based on manufacturer's or engineering recommendations. As applicable, this additional testing increases the probability of locating possible inoperable snubbers without testing 100% of the safety-related snubbers.~~

~~The service life of a snubber is established via manufacturer input and information through consideration of the snubber service conditions and associated installation and maintenance records (newly installed snubbers, seal replaced, spring replaced, in high radiation area, in high temperature area, etc.). The requirement to monitor the snubber service life is included to ensure that the snubbers periodically undergo a performance evaluation in view of their age and operating conditions. These records will provide statistical bases for future consideration of snubber service life. The requirements for the maintenance of records and the snubber service life review are **NOT** intended to affect plant operation.~~