



10 CFR 50.90
L-2016-204
November 10, 2016

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 7 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)
3. Florida Power & Light Company letter L-2016-172, "Response to Request for Additional Information Regarding License Amendment Request 242, Changes to Snubber Surveillance Requirements, Snubber Testing Program Plan – Fifth Inspection Interval," September 1, 2016 (ML16260A399)
4. NRC E-mail "Turkey Point 3 and 4 RAI for LAR 242 Snubber TSs (CACs MF7557/58)" October 18, 2016 (ML16292A716)

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 ISTA, "General Requirements," and 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 (RAI) to complete its review of LAR 242. FPL provided a response to the Reference 2 RAI in Reference 3.

In Reference 4, the NRC staff requested additional information resulting from the original application and the Reference 3 RAI response. Enclosed is the FPL response to the Reference 4 RAI.

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The attachment to the enclosure provides a revised mark-up of TS Surveillance Requirement 4.7.6 on TS page 3/4 7-22 showing a revision to the proposed changes consistent with the Reference 4 RAI. The mark-up supersedes the corresponding mark-up provided in References 1 and 3.

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.

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 November 10, 2016.

Sincerely,



*BERMUD for Summers
acting Site VP*

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 7
License Amendment Request 242
Changes to Snubber Surveillance Requirements
Snubber Testing Program Plan – Fifth Inspection Interval

RAI 7

In its application dated April 4, 2016, the licensee requested, in part, the following changes to Surveillance Requirement (SR) 4.7.6:

- 4.7.6 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.

In its RAI dated August 11, 2016, the NRC requested (via RAI 3) the licensee to clarify the use of TS 4.0.5 along with newly added TS 6.8.4.m and to confirm whether these TSs are duplicative and/or if TS 6.8.4.m encompasses all requirements of TS 4.0.5. In its letter dated September 1, 2016, the licensee responded to RAI 3 stating that TS 6.8.4.m and TS 4.0.5 are duplicative with respect to snubbers and that the licensee has proposed to delete reference to TS 4.0.5 in TS 4.7.6 via a separate license amendment application.

In Attachment 3 to its application dated April 4, 2016, the licensee provided the Turkey Point Nuclear Plant Unit 3 and 4 Snubber Testing Program Plan, which is based on the ASME OM Code 2004 Edition with 2005 and 2006 Addenda. In TS 4.0.5, the ASME OM Code is only used for inservice testing of pumps and valves; it is not applicable to snubbers. Therefore, TS 6.8.4.m and TS 4.0.5 do not appear to be duplicative with respect to snubbers, and the "in addition to the requirements of Specification 4.0.5" no longer appears to be applicable to this SR. The staff requests the licensee to revise the application by proposing to delete "in addition to the requirements of Specification 4.0.5," or to provide additional justification for retaining this phrasing in Specification 4.7.6.

FPL Response

The FPL response to RAI 3 stated: "TS 6.8.4.m and TS 4.0.5 are duplicative with respect to snubbers." The response is clarified herewith insofar as the duplication of requirements for snubber testing is only for the inservice inspection (ISI) of ASME Code Class 1, 2, and 3 components in accordance with Section XI of the ASME Boiler and Pressure Vessel (B&PV) Code and applicable Addenda as required by 10 CFR 50, Section 50.55a.

As stated in RAI 7 above, the inservice testing (IST) provisions of Technical Specification (TS) 4.0.5 pertain only to pumps and valves; however, the ISI provisions apply to ASME Code Class 1, 2 and 3 components which include snubber attachments. Proposed TS 6.8.4.m, Snubber Testing Program, specifies that the program includes the applicable provisions of ASME Section XI and OM codes.

Attachment 3 of Reference 1 contains the Turkey Point Snubber Testing Program Plan (Plan). Sections 1.2 and 3.1 of the Plan specify that integral and nonintegral structural attachments for snubber assemblies shall be examined in accordance with the requirements of the ASME B&PV Code Section XI, Article IWF-2500(a), (b), (c) and (d). Although the Code edition is not specified in the Plan, ASME Section XI 2007 Edition with 2008 Addenda is being used from

pin-to-structure and pin-to-piping (associated attachment hardware) inspections (References 2, 3 and 4). As stated in Section 1.1 of the Plan, ASME OM Code 2004 Edition with 2005 and 2006 Addenda is being used for snubber inspection and testing from pin-to-pin inclusively.

FPL is in agreement that reference to TS 4.0.5 is no longer needed and can be deleted because proposed TS 6.8.4.m, Snubber Testing Program, includes the ASME Section XI requirements for snubber attachment inspection. A revised TS page 3/4 7-22 is attached indicating the proposed change to delete the reference to TS 4.0.5.

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. Florida Power & Light Company letter L-2015-101, "Fifth Ten-Year Inservice Inspection (ISI) Interval Relief Request No. 3," June 8, 2015 (ML15181A251)
3. Florida Power & Light Company letter L-2015-284, "Inservice Inspection Program, Fifth Ten Year Interval, Response to Request for Additional Information for Relief Request No. 3," December 4, 2015 (ML15351A405)
4. NRC Letter, "Turkey Point Nuclear Generating Unit Nos. 3 and 4 – Safety Evaluation for Relief Request No. 3 for Fifth 10-Year Inservice Inspection Interval – Alternative for Examination of Snubbers (CAC Nos. MF6386 and MF6387), March 9, 2016 (ML16047A118)

Attachment

Revised Markup of Technical Specifications page 3/4 7-22

ATTACHMENT

Revised Markup of the Technical Specifications

(1 page follows)

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.~~

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- a. Inspection Types Specification 6.8.4.m.

~~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~~