ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM
REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:8808110060 DOC.DATE: 88/08/01 NOTARIZED: NO DOCKET #
FACIL:50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
AUTH.NAME AUTHOR AFFILIATION
CONWAY,W.F. Florida Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 880615 request for addl info re use of instrumented insp techniques.

DISTRIBUTION CODE: A047D COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 3
TITLE: OR Submittal: Inservice Inspection/Testing/Relief from ASME Code

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL
	PD2-2 LA	1	0	PD2-2 PD	5	5
	TOURIGNY,E	1	1			
INTERNAL:	ACRS	10	10	AEOD/DOA	1	1
	AEOD/DSP/TPAB	1	1	ARM/DAF/LFMB	1	0
	NRR/DEST/MEB 9H	1	1	NRR/DEST/MTB 9H	1	1
	NUDOCS-ABSTRACT	1	1	OGC/HDS2	1	0
	REG FILE 01	1	1	RES/DSIR/EIB	1	1
EXTERNAL:	EG&G ROCKHOLD,H	1	1	LPDR	1	1
	NL 007 HEMMING	1	1	NRC PDR	1	1
	NSIC	1	1			

TOTAL NUMBER OF COPIES REQUIRED: LTTR 31 ENCL 28

RIDS/ADDS

RIDS/ADDS

FLORIDA POWER & LIGHT COMPANY

AUGUST 1 1988

L-88-330

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

Gentlemen:

Re: St. Lucie Unit 2
Docket No. 50-389
Request for Additional Information
Use of Instrumented Inspection Technique

By NRC letter dated June 15, 1988 (E. G. Tourigny to W. F. Conway), you requested additional information concerning the Florida Power & Light Company submittal of February 14, 1986, related to the above subject. The purpose of this letter is to provide you with our response to the request for additional information.

Should there be further questions, please contact us.

Very truly yours,

W. F. Conway
Senior Vice President - Nuclear

WFC/MSD/cm

attachment

cc: Dr. J. Nelson Grace, Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, St. Lucie Plant

MSDUIIT

A047
1/1

Request for Additional Information
St. Lucie Plant, Unit No. 2
Use of Instrumented Inspection Technique (IIT)

Question 1

The licensee requested staff approval to use IIT; however, no time frame for which the approval would be in effect was requested. The staff believes that IIT should be approved for 10-year inspection intervals, consistent with the licensee's 10-year inservice inspection interval. The licensee is requested to specify if it is requesting approval (1) for the current 10-year interval only, after which it will reapply for subsequent 10-year intervals, or (2) for some other time frame and the basis for it.

Response

The Florida Power & Light St. Lucie Unit 2 request for approval to use IIT, where practical, as an alternative test method to hydrostatic Code testing is for the 1st, current 10 year inspection interval. Inservice and functional testing per ASME Section XI will continue to be performed, as applicable, during the appropriate periods of the 10 year interval. For subsequent 10 year inspection intervals, Florida Power & Light will reapply for approval in conjunction with all other required ISI programs.

Question 2

The staff believes that the application of IIT should be documented and periodically submitted to the staff for information. One acceptable method would be to include the information with the Owner's Data Report for Inservice Inspection (Form NIS-1). The information would include the system and scope of inspection, the date(s) tested, and the results. The licensee is requested to specify how it will document the application of IIT and how the staff will be kept informed of its use.

Response

Since IIT is an alternative to hydrostatic Code testing, we are required by our program to document both test methods through the NIS-1 form. All completed test packages including the test data sheets and VT-2 inspector reports are available for NRC Staff review. The following information is generated from the Test Data Sheets and VT-2 inspection reports:

a) System design, operating pressure, and temperature
b) Test temperature and pressure
c) Test duration
d) Test equipment and calibration dates

MSDUIIT

e) Test personnel and certification levels
f) Final reviews by ISI, American Nuclear Insurers Inspector and Engineering
g) Test results summary

Question 3

The staff believes that the Code-required hydrostatic test should be performed, if practical, in lieu of the application of IIT to meet the Code. The licensee is requested to state its position on the matter and define briefly what general acceptance criteria will be used to determine "practicality".

Response

The St. Lucie Plant staff agrees that the Code required hydrostatic test should be performed, if more practical, in lieu of the application of IIT to meet the Code requirements.

The St. Lucie Plant Inservice Pressure Test Program requires that a System and Test package review be completed to document the impracticality of Code required hydrostatic testing. In general, the application of IIT is employed when hydrostatic testing would require relief from the Code due to operational requirements, test implementation demands, or conflicts with system pressure boundaries. In addition to, and in conjunction with the above, IIT is employed where it has been determined that the acquisition of intersystem and intertrain valve leakage data can significantly contribute to assessment of safety system integrity, making IIT the more practical method.

Question 4

The staff believes that in the event of a Code repair or replacement, IIT cannot be used as a substitute for required Nondestructive Testing. The licensee is requested to state its position on this matter.

Response

The St. Lucie Plant Inservice Test Program does not permit the application of IIT to Code repairs and replacements. Hydrostatic Code testing of repairs and replacements per ASME Section XI will continue to be performed.