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SUBJECT: Comment opposing proposed communication re augmented insp of pressurized water reactor class 1 high pressure safety injection piping.

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FPL

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J. Spagnola
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Florida Power & Light Company, P. O. Box 14000, Juno Beach, FL 33408-0420

63 FR 15-233
March 30, 1998

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1998 JUN -4 PM 4:01 MAY 29 1998

RULES & DIR. BRANCH
US NRC L-98-145

Mr. David L. Meyer, Chief
Chief, Rules and Directives Branch
Division of Administrative Services
U.S. Nuclear Regulatory Commission
Mail Stop T6-D59
Washington, DC 20555-0001

**Subject: Florida Power & Light Company Comments
Proposed Generic Communication: Augmented Inspection of Pressurized-
Water Reactor Class 1 High Pressure Safety Injection Piping
(63 Fed. Reg. 15233 (Mar. 30, 1998))**

Dear Mr. Meyer:

Florida Power & Light Company (FPL), the licensed operator of two nuclear power plant units in Dade County, Florida, and two units in St. Lucie County, Florida, hereby submits the following comments on the above-referenced proposed generic communication.

In summary, FPL opposes issuance of the proposed generic communication for the reasons discussed below. Alternatively, FPL suggests clarification of certain matters discussed in the generic communication.

The proposed generic communication appears to be a replication of the requirements and concerns presented and addressed as a result of NRC Bulletin 88-08, "Thermal Stresses in Piping Connected to Reactor Cooling Systems," and its supplements. This bulletin requested licensees to review systems that could be subjected to thermal cycling and to plan and implement a program to provide continuing assurance that fatigue failures could not occur for the remaining life of the plant. Bulletin 88-08 contained reporting requirements that required the licensee to provide a letter confirming completion of the requested activities. By letters dated September 16, 1991, and September 23, 1991, the NRC determined that FPL's responses were consistent with the modification and monitoring alternatives stated in the bulletin and concluded that FPL met the requirements of Bulletin 88-08.

FPL requests that, should the proposed generic letter be issued, clarification be included to explain why the efforts in the Bulletin 88-08 are no longer considered adequate or why it appears that this request for information is a duplication of Bulletin 88-08.

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G PDR



Mr. David Meyer

Proposed Generic Communication: Augmented Inspection of Pressurized-
Water Reactor Class 1 High Pressure Safety Injection Piping

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This letter also raises concerns similar to those expressed in industry comments to the recently proposed change to 10CFR50.55a (Proposed Rule - "Industry Codes and Standards" (62 FR 63892 dated December 3, 1997 and 63 FR 3673 dated January 26, 1998)). NRC is required by public law to use the consensus process for national codes and standards where such a process is available. The first item listed in the proposed generic letter is to identify a discrepancy in ASME Section XI. If this issue is significant enough to warrant a generic communication and a request for information pursuant to 10 CFR 50.54(f), FPL questions why the ASME Code consensus body has not been convinced to implement the change.

Should the proposed generic letter be issued, the following issues should be clarified:

The proposed generic letter should specifically state what piping systems and configurations require reporting. The proposed rule change referenced in the draft generic letter discusses Category B-J Item Numbers B9.20, B9.21., and B9.22. It is not clear whether these are the only configurations that must be addressed.

The generic letter seems to focus on the lack of volumetric examinations. The NRC should clarify whether other methods may be used to detect or eliminate high cycle fatigue.

FPL has reviewed and endorses the comments provided by the Nuclear Energy Institute (NEI).

We appreciate the opportunity to comment on the proposed generic communication.

Sincerely yours,



Rajiv S. Kundalkar
Vice President
Nuclear Engineering

