

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

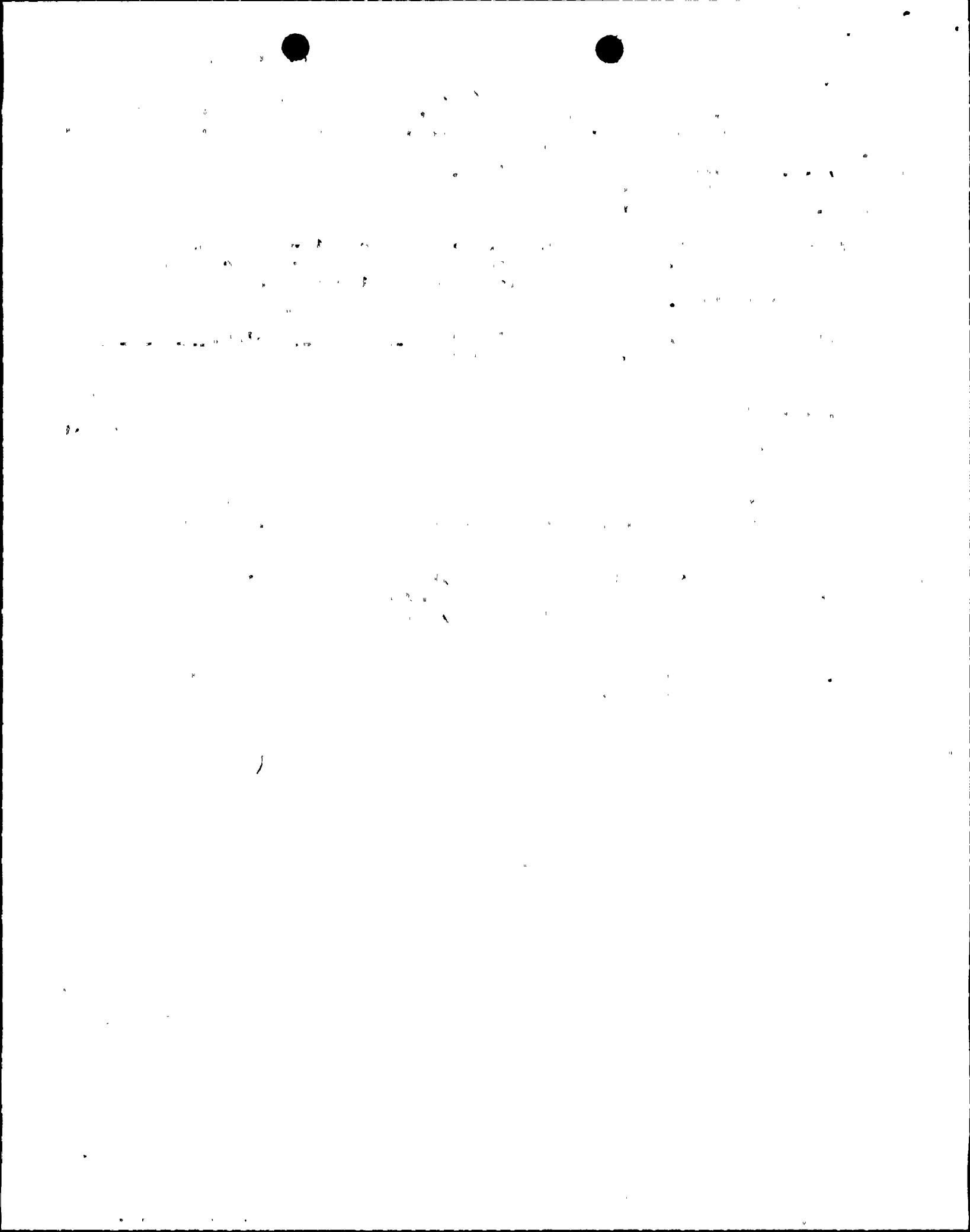
ACCESSION NBR: 8502080185 DOC. DATE: 85/02/04 NOTARIZED: NO DOCKET #
 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250
 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251
 AUTH. NAME AUTHOR AFFILIATION
 WILLIAMS, J.W. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 VARGA, S.A. Operating Reactors Branch 1

SUBJECT: Forwards addl info on inservice insp second 10-yr summary program re valve exams & Relief Request 8 re visual exam of internal valve surfaces. Relief Request 11 encl for clarification.

DISTRIBUTION CODE: A047D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 5
 TITLE: OR Submittal: Inservice Inspection/Testing

NOTES: 05000250
 OL: 07/19/72
 OL: 04/14/73 05000251

	RECIPIENT ID CODE/NAME		COPIES		RECIPIENT ID CODE/NAME		COPIES	
	LTR	ENCL	LTR	ENCL	LTR	ENCL	LTR	ENCL
	NRR ORB1 BC	01	7	7				
INTERNAL:	ACRS	16	10	10	ADM/LFMB		1	0
	ELD/HDS4		1	0	NRR/DE/MEB	15	1	1
	NRR/DE/MTEB	14	1	1	NRR/DL/TAPMG		1	1
	<u>REG FILE</u>	04	1	1	RGN2		1	1
EXTERNAL:	LPDR	03	1	1	NRC PDR	02	1	1
	NSIC	05	1	1				





February 4, 1985
L-85-57

Office of Nuclear Reactor Regulation
Attention: Mr. S. A. Varga, Chief
Operating Reactors Branch #1
Division of Operating Reactors
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Varga:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Inservice Inspection
Second 10-year Summary Program

Our letter (L-84-341) dated November 20, 1984 provided additional information on the Turkey Point Units 3 and 4 Inservice Inspection Program. Further information on valve examinations and Relief Request 8 are provided as requested by your staff. In addition, a copy of Relief Request 11 is provided for clarification. Relief Request 11 was not modified by our November 20, 1984 letter.

Very truly yours,

J. W. Williams, Jr.
Group Vice President
Nuclear Energy

JWW/PLP/js

Attachment

cc: J. P. O'Reilly, Region II
Harold F. Reis, Esquire
PNS-LI-85-054-1

8502080185 850204
PDR ADDCK 05000250
Q PDR

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REQUEST FOR ADDITIONAL INFORMATION

TURKEY POINT UNIT NO. 3/4
SECOND INSPECTION INTERVAL

NRC QUESTION NO. 5 REQUEST FOR ADDITIONAL INFORMATION

Please indicate whether the entries under item B12.50 of Appendix A in your May 4, 1984, submittal means that you have identified a total of 13 valve groups in the Turkey Point Plant that fit footnote 3 for Item B12.50. For how many of these groups have you examined one or more valves? What were the results of these examinations? If this information has been previously submitted to NRC, you may refer to specific pages in previously submitted documents.

FP&L RESPONSE:

The 13 valves identified in the Program represent the total number of valves, not groups, subject to code requirements (footnote 3). FP&L has reviewed the maintenance records for the First Inspection Interval and have determined a total of eight (8) valves were disassembled.

Table No. 1 denotes the maintenance records and valves inspected within each group and the results.

REVIEW OF MAINTENANCE RECORDS FOR THE FIRST INSPECTION INTERVAL						
VALVE NO.	1972	1973	1976	1977	1982	EXAMINATION RESULTS
<u>GROUP 2</u>						
875 A				3		NO RECORDABLE INDICATIONS
875 B				3	3	NO RECORDABLE INDICATIONS
875 C	3		3	4		NO RECORDABLE INDICATIONS
<u>GROUP 1</u>						
750					4	NO RECORDABLE INDICATIONS
751					4	NO RECORDABLE INDICATIONS

NOTE:
THE 3 AND 4 REFER TO TURKEY POINT UNITS 3 OR 4

TABLE NO. 1



TURKEY POINT UNITS 3 & 4

INSERVICE INSPECTION

RELIEF REQUEST # 8

A. COMPONENT IDENTIFICATION:

- CLASS 1
- CODE EXAMINATION CATEGORY B-M-2
- VALVE BODIES

B. EXAMINATION REQUIREMENTS:

- 1) ITEM B12.50 - VISUAL EXAMINATION (VT-3) OF INTERNAL SURFACES - VALVES

C. BASIS FOR RELIEF:

Disassembly of these valves for the sole purpose of performing a VT-3 visual examination is not practical. The process of disassembling these components will result in considerable exposure of personnel to radiation and significantly increase the risk of component damage or failure without providing a compensating increase in the level of quality and safety.

D. ALTERNATIVE EXAMINATION

- 1) Periodic Inservice testing per subarticles IWV-3400 and/or IWV-3520 (valves);

or

- 2) Periodic system leakage test per Category B-P, table IWB-2500-1;
- 3) Perform the required VT-3 examinations, in accordance with the sampling criteria of table IWB-2500-1, category B-M-2 in the event the components are disassembled for maintenance or repair;
- 4) The alternative tests and examinations provide an assurance of acceptable quality and safety.

E. IMPLEMENTATION SCHEDULE

- SECOND INSPECTION INTERVAL



TURKEY POINT UNITS 3 & 4

INSERVICE INSPECTION

RELIEF REQUEST # 11

A. COMPONENT IDENTIFICATION:

- CLASS 2
- CODE EXAMINATION CATEGORY C-F
- PRESSURE RETAINING WELDS IN PIPING - CONTAINMENT SPRAY SYSTEM

B. EXAMINATION REQUIREMENTS:

- 1) ITEM C5.10 - PIPING WELDS, 1/2 INCH OR LESS NOMINAL WALL THICKNESS

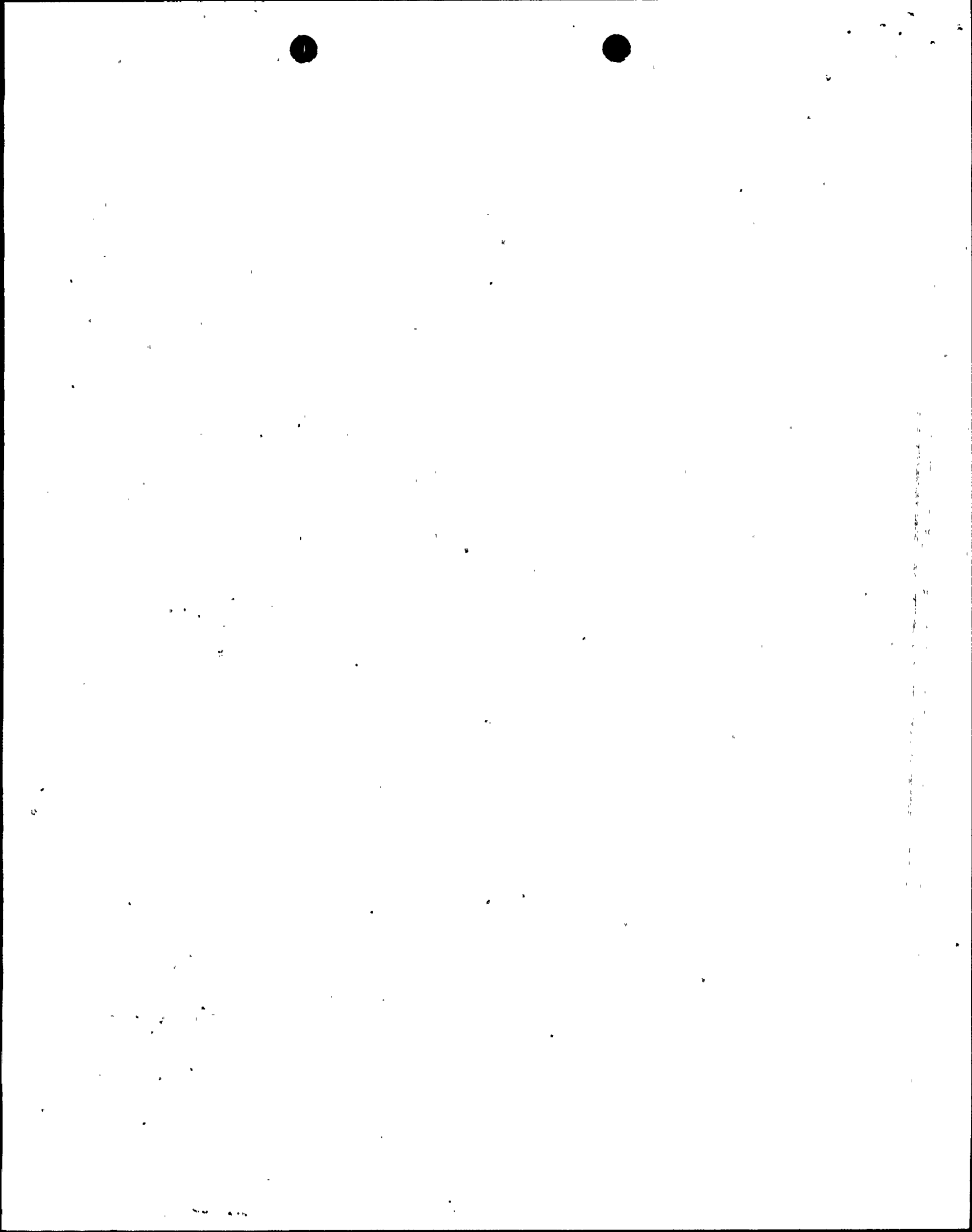
ITEM C5.11 - CIRCUMFERENTIAL WELDS, 100% SURFACE FOR EACH WELD REQUIRING EXAMINATION;
- 2) ITEM C5.12 - LONGITUDINAL WELDS, SURFACE EXAMINATION 2.5t AT THE INTERSECTING CIRCUMFERENTIAL WELD.

C. BASIS FOR RELIEF:

- 1) The Containment Spray piping is not required to operate during normal system operation;
- 2) Following initial inspection and testing, the containment spray piping downstream of the second isolation valve outside containment is subject to no pressure transients and no temperature transients other than ambient containment building/auxiliary building pressure and temperature; thus, there is no mechanism for failure;
- 3) ASME Section XI, table IWC-2500-1, examination category C-H, note 1, exempts open ended portions of systems from VT-2 tests.

D. ALTERNATIVE EXAMINATION

- 1) At least once every (5) years, the piping is tested by performing an air or smoke flow test through each spray header to demonstrate an open flow path.
(REFERENCE: ASME SECTION XI, IWC-5222(d))
- 2) In the event that the Containment Spray System is operated or in the case of a significant seismic event. FP&L will reevaluate this Relief Request to determine if additional nondestructive examination is warranted.



RELIEF REQUEST # 11 continued

E. IMPLEMENTATION SCHEDULE

- SECOND INSPECTION INTERVAL

