



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

January 23, 1992

Docket Nos. 50-250
and 50-251

Mr. J. H. Goldberg
President - Nuclear Division
Florida Power & Light Company
Post Office Box 14000
Juno Beach, Florida 33408-0420

Dear Mr. Goldberg:

SUBJECT: TURKEY POINT UNITS 3 AND 4 - INTERIM RELIEF FROM THE INSERVICE TESTING PROGRAM FOR PUMPS AND VALVES (TAC NOS. M82373 AND M82374)

On October 3, 1989, you submitted your response to Generic Letter 89-04. Your submittal consisted of a review of your Inservice Testing (IST) Program for the second 10-year interval, along with several requests for relief from the ASME Pressure Vessel Code Section XI requirements. The staff's Safety Evaluation (SE) was transmitted to you on September 20, 1991, and provided a summary tabulation of our conclusions concerning each relief request.

Your letter of December 31, 1991, resubmitted relief requests VR-2 (AFW to steam generator supply valves: CV-*-2816 thru -2818 and CV-*-2831 thru -2833), VR-6 (charging pump to boron injection valve: HCV-*-0121), VR-9 (containment spray header check valves: 3(4) - 0890A and -0890B), VR-11 (SI hot leg injection check valves: 3(4) -0874A and -0874B), VR-12 (SI cold leg injection check valves: 3(4) -0875A, -0875B, and -0875C), VR-13 (SI accumulator discharge check valves: 3(4) -0875D, -0875E, and -0875F), and VR-14 (RHR cold leg injection check valves: 3(4) -0876B and -0876C). Your letter requested an extension of these reliefs. You also requested the following new reliefs: VR-29 (AFW pump check valves: AFWU 3-0017 and 4-0016), VR-30 (boric acid pumps to charging pump check valves: 3(4) -0351 and 3(4) -0397 A & B), VR-31 (main steam check valves: 3(4) 10-004 thru -006), and VR-32 (fuel oil transfer pump check valves: SV-4-3434 A & B). The relief requests VR-2, VR-6, VR-9, VR-11, VR-12, VR-13 and VR-14 were previously reviewed by the staff and the evaluation is contained in staff's SE dated September 20, 1991. The staff's preliminary review of the information related to these relief requests provided in your letter of December 31, 1991 indicates that the relief requests, as yet, do not fully address the conclusions of the staff's SE. However, based on the staff's preliminary review of the resubmitted relief requests and discussions during the telecon of December 18, 1991, the staff agrees that additional time is required to fully address those conclusions and develop suitable alternative surveillance techniques. In the interim, the proposed alternative testing as evaluated by the staff and transmitted to you on September 20, 1991, provides an acceptable

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level of quality and safety for these valves, pursuant to 10 CFR 50.55a(a)(3)(i). Therefore, an extension of the period of relief is appropriate through August 31, 1992.

With respect to new relief requests VR-29, VR-30, VR-31, and VR-32, your letter indicates that compliance with ASME Code Section XI IWV 3520 requirements is impractical. The Code requires that these valves be exercised at least once every 3 months during normal plant operation or when the plant is in a cold shutdown mode. For VR-29 and VR-30, it is impractical to comply with the Code, since currently there is no instrumentation available to verify flow in the lines. The valves included in VR-31 are large stop check valves in the main steam lines leading to the main turbine generator. Presently, there is no practical way of verifying closure of these valves by a reverse flow test, and during plant operation at power, closure of these valves would result in a severe transient on the plant. The valves covered under the relief request VR-32 were installed during the recently completed dual-unit outage. These valves open to provide flow paths for diesel fuel oil from the fuel oil transfer pumps to the respective day tanks. These are totally enclosed solenoid valves having no local or remote position indication, thus measuring an accurate stroke time is impractical with the current design. The proposed alternative testing includes part-stroking during plant operation, disassembly and inspection of valve components during a refueling outage, partial flow testing after reassembly, and use of a handwheel during cold shutdown. The staff's preliminary review indicates that the proposed alternative testing provides reasonable assurance of the operational readiness of these valves, and pursuant to 10 CFR 50.55a(g)(6)(i), an interim relief is appropriate until the staff completes its review, or by August 31, 1992, whichever comes first.

The relief requests involving disassembly, inspection, and manual exercising of the valves, as stated in your December 31, 1991 letter, are considered short-term alternative testing proposals which should be replaced by alternative surveillance techniques, such as non-intrusive diagnostics. In the interim, you should evaluate means of inservice testing of valve performance other than employing a disassembly and inspection program. If no other means, including non-intrusive diagnostics, can be utilized, you will need to request a specific relief for each individual valve, or group of similar valves. You will also be required to describe the reasons why no other means of inservice testing are available. Further, as part of the short-term alternative testing proposal, you must include requirements to verify, prior to reassembly, the cleanliness and proper orientation of each valve.

In your letter of December 31, 1991, you also requested extending the inspection interval to 10 years for groups of identical valves used in similar applications (VR-12, VR-13, VR-14) based on historical data and experience. The staff's preliminary review indicates the bases provided are inconsistent and incomplete and therefore, cannot be used to justify the proposed interim extension. Therefore, on the basis of the information reviewed, the request for extending the inspection interval for these valves to 10 years is denied.



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The staff has determined that extending the relief period until August 31, 1992 for reliefs VR-2, VR-6, VR-9, VR-11, VR-12, VR-13, and VR-14, is appropriate and, in the interim, the proposed alternative testing will provide an acceptable level of quality and safety pursuant to 10 CFR 50.55a(a)(3)(i). In addition, interim relief is granted for relief requests VR-29, VR-30, VR-31, and VR-32 pursuant to 10 CFR 50.55a(g)(6)(i), in that the Code requirements are impractical and that the granting of the relief is authorized by law and will not endanger life or property or the common defense and security and is otherwise in the public interest. These reliefs are granted until the staff's detailed review is completed or until August 31, 1992, whichever comes first.

Sincerely,

/s/
 Herbert N. Berkow, Director
 Project Directorate II-2
 Division of Reactor Projects - I/II
 Office of Nuclear Reactor Regulation

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