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## UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001 .

**FUL 1 5 1994** 

Docket No. 50-251

Mr. J. H. Goldberg President - Nuclear Division Florida Power and Light Company P.O. Box 14000 Juno Beach, Florida 33408-0420

Dear Mr. Goldberg:

SUBJECT: TURKEY POINT UNIT 4 - INTERIM APPROVAL OF ALTERNATIVES ASSOCIATED WITH THE INSERVICE INSPECTION PROGRAM (TAC NO. M87725)

The NRC staff has performed a review of the Turkey Point, Unit Nos. 3 and 4 Inservice Inspection (ISI) Program relief request number 11 submitted on May 31, 1994, as it relates to the 4B Intake Cooling Water (ICW) pump leakage reported on July 15, 1994.

The leakage consisted of several drops per minute at the bolted connection of the pump to base plate following reinstallation of the pump and motor after periodic maintenance. You have experienced leakage in similar locations which stopped after several days of operation and based on past experience you expect that this leakage will also stop. Previous editions of the ASME Code to which you were committed did not require bolt removal and inspection for this condition, however, you are now committed to the 1989 edition of the ASME Code which would require disassembly of the joint for corrective action. Joint disassembly requires extensive removal of equipment and the allowable outage time for this component may be exceeded.

Interim approval of the condition was requested by your staff. You proposed to evaluate the leakage as discussed in relief request number 11. In our July 15, 1994, phone conversation, your staff stated that if your evaluation determines that the leakage is acceptable until the next refueling outage, you will repair the leakage prior to the end of your next refueling outage.

The bolts in this case are 316 stainless steel which has good corrosion resistance in this application. The mechanics reassembling this joint during the week on July 15, 1994, verified that the bolts were in good condition and not corroded.

Based upon our review of relief request number 11 for this specific application, we have determined that, for the interim, an acceptable level of safety will be provided by the proposed actions. Therefore, the proposed alternative described in relief request number 11 for the specific case of the 4B ICW pump is authorized for an interim period, until the end of the next refueling outage, in accordance with 10 CFR 50.55a(a)(3)(i) provided that, if

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Mr. J. H. Goldberg Florida Power and Light Company

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A. Component Identification:

Turkey Point Units 3 and 4

Class 1, 2, and 3 Pressure Retaining Bolted Connections

B. Examination Requirements:

Rules for Inservice Inspection of Nuclear Power Plant Components, 1989 Edition

IWA-5250(a)(2)

If leakage occurs at a bolted connection, the bolting shall be removed, VT-3 visually examined for corrosion, and evaluated in accordance with IWA-3100;

C. Relief Requested:

Florida Power and Light requests relief from removing and performing a VT-3 visual examination of bolting on bolted connections when leakage is observed during a system pressure test.

D. Basis for Relief:

The requirement to remove all bolting from a bolted connection to check for degradation is an unnecessary burden. This requirement does not take into account the corrosiveness of the fluid, the material of the leaking component, the type and location of the leakage, and the history of material degradation in a similar environment. The 1992 Edition of ASME Section XI changed the IWA-5250 requirements to allow the removal of the bolt closest to the source of leakage, reducing the number of bolts to be examined.

Code interpretation XI-1-92-01 states that new bolting or bolting that has received a VT-3 examination prior to installation and has not been inservice does not have to be evaluated in accordance with this section. This is recognition by the Code that leakage at this point would be considered a maintenance item.

Performing VT-3 visual examinations on bolting for evidence of corrosion is impractical since Section XI has consistently referenced the VT-1 examination for pressure retaining bolting. FPL procedures include the acceptance criteria for VT-1 examinations of bolting. The VT-3 examination does not provide adequate acceptance criteria for bolting. Revising procedures solely for the purpose of changing the VT-1 requirements to VT-3 does not provide any additional benefit.

E. Alternative Examinations

FPL will evaluate the consequences of leakage found at bolted connections during the conduct of system pressure tests. If the evaluation indicates the bolting may be susceptible to corrosion, the bolt closest to the source of leakage shall be removed and a VT-1 examination will be performed in accordance with IWA-2211. The results of the examination will be compared against the acceptance criteria of IWB-3517.1.



When the leakage is identified on bolting that is inservice and a VT-1 examination is required, and the evaluation justifies continued service, the removal of the bolting may be deferred to the next time that portion of the system is out of service, but no later than the next refueling outage.

If the removed bolting shows evidence of degradation exceeding the acceptance criteria and the evaluation determines the bolting is susceptible to corrosion, the remaining bolting will be removed, a VT-1 examination performed, and the results compared against the acceptance criteria.

The extent of required examinations, the proposed alternatives, and surveillance of systems on a regular basis provides an acceptable level of quality and safety.

F. Implementation Schedule

Third Inservice Inspection Interval

G. Attachments

None





the leakage continues, corrective actions are taken and the leakage is stopped prior to completing the next refueling outage. We have determined that, for an interim period, the proposed alternatives would provide an acceptable level of quality and safety. We have also concluded that there is reasonable assurance of the operational readiness of the systems to perform their safetyrelated functions during this interim period.

Since the interim approval of relief request number 11 for the 4B ICW pump does not represent the results of the final program review, the final SE for relief request number 11 could contain additional conditions for long-term use. Therefore, you are authorized to implement your proposal for the 4B ICW pump as described in your submittal with the understanding that changes to it may be necessary.

Until we complete our detailed review of the ISI program, you must comply with both the existing Technical Specifications (TS) and the proposed ISI program. Thus, the authorization of the alternatives to the ASME Code for an interim period does not relieve you from any of the requirements in the existing TS.

The staff has determined that pursuant to 10 CFR 50.55a(a)(3)(i) interim approval of the alternative described in relief request number 11 for the 4B ICW pump is authorized by law and will not endanger life or property or the common defense and security. The staff has also concluded that interim approval of this alternative is otherwise in the public interest considering the burden that could result if the requirements were imposed on the facility. The interim approval of alternatives will terminate at the end of your next refueling outage, currently scheduled for October 1994.

Sincerely, Victor McCree, Acting Director Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation cc: See next page Distribution Docket File NRC & Local PDRs PDII-2 Reading S. Varga, 14/E/4G. Lainas, 14/H/3 V. McCree E. Tana R. Croteau D. Hagan, 3302 MNBB OGC G. Hill (4), P-137 J. Norberg, 7-E-23 C. Grimes, 11/F/23 ACRS (10) OC/LFMB OPA M. Sinkule, R-II :LA:PDII-2 :PM:PDII-2 :DVPD2/1-2 OFC : EMCB : : :ETana, NAME :RCroteau :VMcCree :JStrosnider-see previous concurrence :7/ (5/94 :7/1</94 DATE :7//5/94 :7/15/94 : : OFFICIAL RECORD COPY FILENAME: G:\TP87725B.ISI



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