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SUBJECT: Forwards revised relief request 4,ASME Section XI,1989 Class 1,2 & 3 Snubbers as discussed during several telcon w/NRC.

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L-95-128
10 CFR 50.55a

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

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Inservice Inspection Program
Third Ten Year Summary
Revised Relief Request No.4

By letter L-93-220, dated September 9, 1993, Florida Power and Light Co. (FPL) submitted a summary of the Inservice Inspection (ISI) Program and relief requests for the third ten year interval at Turkey Point Units 3 and 4. The ISI Program details how FPL will implement Inservice Inspection requirements at Turkey Point during the third ten year interval. By letter L-94-118, dated May 31, 1994, FPL provided additional information regarding the ISI Program, as requested by NRC letter dated April 4, 1994.

As a result of questions raised during NRC's review of Relief Request No. 4, and as discussed during several telephone conversations with the NRC, attached is the revised Relief Request No. 4, ASME Section XI, 1989 Edition, IWF-5000 Inservice Test Requirements, ASME Class 1, 2, and 3, Snubbers.

Should there be any questions concerning this submittal, please contact us.

Very truly yours,

DE Jernigan for

T. F. Plunkett
Vice President
Turkey Point Plant

OIH

Attachment

cc: Stewart D. Ebneter, Regional Administrator, Region II, USNRC
T. P. Johnson, Senior Resident Inspector, USNRC, Turkey Point Plant

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ATTACHMENT TO L-95-128

REVISED RELIEF REQUEST NO. 4

Turkey Point ISI Program
Revised Relief Request No. 4

A. Component Identification

Turkey Point Units 3 and 4

- ASME Section XI, 1989 Edition
- IWF-5000 Inservice Test Requirements
- ASME Class 1, 2 and 3
- Snubbers

B. Examination Requirements:

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

IWF-5300 - Inservice Examination and Tests

(a) Inservice examinations shall be performed in accordance with the first Addenda to ASME/ANSI OM-1987, Part 4 (published in 1988), using the VT-3 visual examination method described in IWA-2213.

(b) Inservice tests shall be performed in accordance with the first Addenda to ASME/ANSI OM-1987, Part 4 (published in 1988).

C. Relief is requested from the requirements of the first Addenda to ASME/ANSI OM-1987, Part 4 (published in 1988).

D. Basis for Relief:

1) The snubber visual examination requirements defined in the Turkey Point Units 3 and 4 Technical Specification 3/4.7.6, Snubbers, follow the recommendations of Generic Letter (GL) 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions," issued December 11, 1990. GL 90-09 was issued to reduce the burden placed upon utilities by the then overly restrictive visual examination schedule. Turkey Point Units 3 and 4 Technical Specifications, Amendment Nos. 151 and 146, issued February 7, 1992, incorporated the recommendations of GL 90-09 and removed the restrictive visual examination requirements from the Technical Specifications. The visual examination schedule specified in Section 2.3.2.2 of the first Addenda to ASME/ANSI OM-1987, Part 4 (OM Part 4) would reinstate the requirements which were in place prior to the issuance of GL 90-09 and incorporation of the recommended changes into the Technical Specifications. The snubber visual examination frequency specified by Section 2.3.2.2 of OM

Part 4 is time based (18 months ± 25%). The Turkey Point Technical Specifications snubber visual examination schedule is based on the recommendations of GL 90-09, allowing snubber operability tests to be performed during plant refueling outages. This schedule is based in the number of unacceptable snubbers found during the previous inspection in proportion to the sizes of the various snubber populations or categories. The inspection interval is based on a fuel cycle of up to 24 months and may be as long as two fuel cycles, or 48 months, depending on the number of unacceptable snubbers found during the previous visual inspection. The visual examination test frequency specified in Section 2.3.2.2 of OM Part 4 may result in more unanticipated shutdowns to meet the surveillance interval or at a minimum, require NRC approval of any deviation from the specified frequency.

2) The initial sample size for operability testing specified in Section 3.2.3.1 of OM Part 4, "The 10% Testing Sample Plan," is the same as that specified in the Turkey Point Technical Specifications. The sample expansion requirement specified in Section 3.2.3.1 of OM Part 4 is less restrictive than the sample expansion requirement of the Turkey Point Technical Specifications, which require a 10% sample expansion. Although the sample expansion requirement under Section 3.2.3.1 of OM Part 4 would result in less snubbers being tested, it would significantly increase the engineering manhours required to categorize the failure mode, identify the sample expansion required based on the failure mode, and identify the corrective action to be taken. The Turkey Point Technical Specifications require a 10% sample expansion (based on design type population) without the extensive engineering manhours required by OM Part 4. Snubber functional testing, including any sample expansion required, is performed during the core offload portion of the refueling outage (approximately 7 to 9 days). Technical Specification requirements for functional testing are discussed further in Section E, Alternative Examinations. Section 3.2.3.1 of OM Part 4 imposes requirements that would extend the time required to complete the snubber functional testing beyond the core offload window and adversely affect the refueling outage with no increase in the level of quality or safety.

3) During the construction period at Turkey Point, preservice examinations for thermal movement, specified under Section 2.2.1 of OM Part 4, were not required or performed. Additionally, preservice inspection records currently available do not meet the requirements of Section 2.4 of OM Part 4. Performance of these

inspections at this time would involve extension of an outage to obtain the information specified and would involve extensive manhours for both the examiners and engineers responsible for the evaluation.

4) Temperature correlations required by Section 1.3.1 of OM Part 4, which relate the conditions under which the snubber is tested and the installed operating conditions, are not available. Development of this correlation would entail numerous engineering manhours and would require a large capital commitment to support the testing necessary to obtain the required data.

E. Alternative Examinations:

1) FPL will perform functional testing in accordance with the Turkey Point Units 3 and 4 Technical Specifications. The base snubber sample size shall be 10%, with a 10% sample expansion based on design type, population and the following:

A) Snubbers of the same manufacturers design type;

B) Snubbers immediately adjacent to frozen snubbers;

C) Snubbers from the same system; and

D) Snubbers from other systems that have similar operating conditions , such as temperature, humidity, vibration and radiation.

An engineering evaluation will be performed for each snubber which fails to meet the functional test acceptance criteria to determine the cause of the failure. The results of this evaluation will be used, if applicable, in selecting snubbers to be tested in an effort to determine the operability of other snubbers, irrespective of type, which may be subject to the same failure mode.

If a snubber selected for functional testing either fails to activate or fails to move, i.e., frozen-in-place, the cause of the failure will be evaluated under the provisions of 10 CFR Part 21.

Should the results of the evaluation indicate that the failure was caused by either manufacturer of design deficiency, further actions will be taken, if necessary, based on manufacturer or engineering recommendations.

For snubber(s) found inoperable, an evaluation will be performed on the components to which the inoperable snubber are attached. The evaluation is designed to determine if the components to which the inoperable snubber(s) are attached were adversely affected by the inoperability of the snubber(s) in order to ensure that the component remains capable of meeting the designed service.

2) Visual examinations will be conducted in accordance with Turkey Point Technical Specifications Table 4.7-1 "Snubber Visual Inspection Interval." In addition, all snubbers will be handstroked during the visual examination.

Snubbers which appear inoperable as a result of visual inspections will be classified as unacceptable and may be reclassified acceptable for the purpose of establishing the next visual inspection interval, provided that: (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers that my be generically susceptible; and (2) the affected snubber is functionally tested in the as-found condition and determined to be operable.

3) Visual examinations conducted in accordance with Turkey Point Technical Specifications Table 4.7-1 "Snubber Visual Inspection Interval" will be performed by VT-3 certified examiners.

F. Implementation Schedule

Third Inservice Inspection Interval

G. Attachments

None