NRR-DMPSPEm Resource

From: Wentzel, Michael
Sent: Thursday, January 25, 2018 10:08 AM
To: Robert.Hess@fpl.com
Cc: Mihalakea, Stavroula; Mack, Jarrett; Hanek, Olga
Subject: Request for Additional Information - Turkey Point 3 and 4 LAR 248 (CAC No. MF9907 and MF9908; EPID L-2017-0252)

Dear Mr. Hess:

By application dated June 28, 2017 (Agencywide Documents and Access Management System (ADAMS) Accession No. ML17180A447), Florida Power & Light Company (FPL, the licensee) submitted License Amendment Request (LAR) No. 248 for Turkey Point Nuclear Generating Unit Nos. 3 and 4 (Turkey Point). The proposed amendments would revise the Technical Specifications (TSs) to relocate to licensee controlled documents select acceptance criteria specified in TS surveillance requirements (SRs) credited for satisfying Inservice Testing (IST) Program requirements, delete the SRs for the American Society of Mechanical Engineers (ASME) Code Class 1, 2 and 3 components, replace references to the Surveillance Frequency Control Program (SFCP) with reference to the Turkey Point IST Program where appropriate, and create the Reactor Coolant Pump (RCP) Flywheel Inspection Program.

The U.S. Nuclear Regulatory Commission's (NRC's) Mechanical Engineering and Inservice Testing Branch (EMIB) staff reviewed the application and identified areas where it needs additional information to support its review. The NRC staff's request for additional information (RAI) is provided below. As discussed with Ms. Stavroula Mihalakea and Mr. Jarrett Mack of your staff on January 24, 2018, the NRC staff requests the licensee to respond to the RAI by February 26, 2018.

EMIB RAI 1

The licensee proposes to relocate the acceptance criteria in SR 4.5.2.c.1, SR 4.5.2.c.2, and SR 4.6.2.1.b to the IST program, and proposes to test the Safety Injection (SI) pumps, Residual Heat Removal (RHR) pumps and Containment Spray (CS) pumps in accordance with IST procedures.

The purpose of the IST program is to monitor the degradation and rate of degradation, and to determine the operational readiness of a component for the period until the next IST. The purpose of a SR is used to determine the operability of a component (during the period since the last SR was performed and going into the new period). The bases and values in these programs can be different. Unless specifically noted, IST program procedures are not generally used to verify a specific SR. The licensee is requested to confirm that the IST program test procedures verify that affected SRs, or operability requirements, are met.

EMIB RAI 2

The licensee proposes to change surveillance frequencies for SR 4.4.4, 4.4.6.2.2.a, 4.4.11, 4.4.11.b, 4.4.11.c, and 4.5.1.1.d from "in accordance with SFCP program" to "in accordance with IST program." There is no discussion of changes in test frequencies between the two programs. The licensee is requested to specify the relevant test frequencies in the SFCP and the IST programs and, if different, justify why the differences are acceptable.

EMIB RAI 3

SR 4.4.6.2.2.c requires that each Reactor Coolant System Pressure Isolation Valve (PIV) specified in Table 3.4.1 shall be demonstrated OPERABLE by verifying leakage to be within its limit prior to returning the valve to service following maintenance, repair or replacement work on the valve. The licensee proposes to delete SR

4.4.6.2.2.c, because SR 4.4.6.2.2.c is redundant with the requirements of Appendix B to 10 CFR Part 50, Section XIV, “Inspection, Test, and Operating Status,” Section XV, “Nonconforming Materials, Parts, or Components,” and Section XVI, “Corrective Action.” In general, Appendix B does not contain clear and specific criteria or requirements for establishing a SR to verify that certain systems or components are operable.

Therefore, the licensee is requested to identify the paragraphs or statement in Sections XIV, XV, and XVI of Appendix B that are relevant to the specific requirement of SR 4.4.6.2.2.c and show how each part of the SR is redundant to a specific requirement in App B.

The staff notes that ASME OM Code, ISTC-3630(f), “Corrective Action” requires that valves or valve combinations with leakage rates exceeding the values specified by the Owner per ISTC-3630(e) shall be declared inoperable and either repaired or replaced, and a test demonstrating acceptable operation shall be performed following any correction before the valve is returned to service. ISTC-5115(e), requires that before returning a repaired or replacement valve to service, a test demonstrating satisfactory operation shall be performed. SR 4.4.6.2.2.c implements requirements comparable to ISTC-3630(e) and ISTC-5115(e) of the ASME OM Code. However, IST program procedures, unless otherwise specified, are not used to verify a specific SR.

Therefore, optionally, the licensee is requested to confirm that a post repair/replacement test, comparable to SR 4.4.6.2.2.c, is performed in the licensee IST program or other licensee program, identify the document/section, and post relevant portions on e-portal for staff verification.

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