NRC FORM 195 (2-70) U.S. NUCLEAR REGULATORY COMMISSION

DOCKET NUMBER 50-251

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Mr. George Lear	Florida Power & Light Company Miami, Florida Mr. Robert Uhrig	8/24/76 DATE RECEIVED 8/26/76
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DESCRIPTION

Ltr. re our 4/26/76 ltr. and their 6/2/76 ltr.....furnishing information concerning Inservice Inspection Period.

(2-P)

PLANT NAME:
Turkey Point #4

ENCLOSURE

ACKNOWLEDGED

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P.O. BOX 013100, MIAMI, FLORIDA 33101

FPL
FLORIDA POWER & LIGHT COMPANY

August 24, 1976
L-76-306

Office of Nuclear Reactor Regulation
Attention: Mr. George Lear, Chief
Operating Reactors Branch #3
Division of Operating Reactors
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Lear:

Re: Turkey Point Unit 4
Docket No. 50-251
Inservice Inspection Period

Your letter of April 26, 1976 requested that Florida Power & Light Company inform you of the date by which we intended to submit an amendment request to bring the Turkey Point Technical Specifications into conformance with ASME code inservice inspection requirements per the February 27 revision to 10 CFR Part 50.55a. Our request was to include information to support any determination that conformance with certain requirements is impracticable. Our letter L-76-210 of June 2, 1976 projected that we would be able to submit our amendment request for Unit 4 by September 1, 1976. We would now like to advise you of our progress in developing a revised inservice inspection program and update the schedule for submitting our amendment request.

We have concluded our review of the revised regulations and the ASME Section XI Code(s) as they apply to the Turkey Point Plant. We have also contracted the consultant services of our Inspection Agency (Southwest Research Institute). On the basis of our review, we propose to develop the inservice test program for pumps and valves, and the inservice examination program for Class 1, 2 and 3 components to the 1974 Edition of ASME Section XI thru the Summer, 1975 Addenda. Where volumetric examinations of welds on Class 1 and 2 piping systems are required, we will apply the concepts of Appendix III of Section XI Code to these examinations. We now propose to submit our Technical Specification amendment request according to the following program schedules.

- Inservice Test Program for Pumps and Valves - November 29, 1976.
- Inservice Examination Program for Class 1, 2 and 3 Components - March 7, 1977.

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With respect to Class 1, 2 and 3 components, we feel that the March 7 date is realistic and can be met, however, it does not include any extra time to accommodate contingencies that may arise, such as restricted access or the unavailability of ultrasonic test standards. Since Unit 4 is operational, access and verification will be restricted in certain areas because of radiation levels and component insulation. This may make it difficult to identify or verify all components or conditions present in certain systems, which could have a consequent affect on the schedule. Also, even after the inspection program is developed and all exceptions are identified, there may be a lag in the availability of ultrasonic test standards which could affect the first examination within the next scheduled 40-month inspection period. Subsequent examinations within this period would not be affected.

We will continue to keep you informed of new developments which could affect our schedule for developing the revised inservice inspection program for Turkey Point Unit 4.

Very truly yours,

J. A. De Mastry
for

Robert E. Uhrig
Vice President

REU/MAS/cpc

cc: Mr. Norman C. Moseley
Jack R. Newman, Esquire