



L-2019-103  
10 CFR 54.17

May 9, 2019

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555-0001

Re: Florida Power & Light Company  
Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Turkey Point Units 3 and 4 Subsequent License Renewal Application  
Use of Adhesive Anchoring Systems in Structural Supports

References:

1. FPL Letter L-2018-004 to NRC dated January 30, 2018, Turkey Point Units 3 and 4 Subsequent License Renewal Application (ADAMS Accession No. ML18037A812)
2. FPL Letter L-2018-082 to NRC dated April 10, 2018, Turkey Point Units 3 and 4 Subsequent License Renewal Application – Revision 1 (ADAMS Accession No. ML18113A134)
3. FPL Letter L-2019-072 to NRC dated April 1, 2019, Turkey Point Units 3 and 4 Subsequent License Renewal Application First Annual Update (ADAMS Accession Number ML19093A060)

Florida Power & Light Company (FPL) submitted a subsequent license renewal application (SLRA) for Turkey Point Units 3 and 4 to the NRC on January 30, 2018 (Reference 1) and SLRA Revision 1 on April 10, 2018 (Reference 2).

The purpose of this letter is to provide the attached information on the use of adhesive anchoring systems in structural support applications. Because these anchoring systems were not included in the SLRA, or its First Annual Update (Reference 3), the attachment also amends the SLRA with a commitment resolving use of adhesive anchoring systems prior to the subsequent period of extended operation.

If you have any questions, or need additional information, please contact me at 561-691-2294.

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NRR

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I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 9, 2019.

Sincerely,

A handwritten signature in black ink, appearing to read 'William Maher', is written over a horizontal line.

William Maher  
Senior Licensing Director  
Florida Power & Light Company

WDM/RFO

Attachment: Use of Adhesive Anchoring Systems in Structural Supports

cc:

Senior Resident Inspector, USNRC, Turkey Point Nuclear  
Regional Administrator, USNRC, Region II  
Project Manager, USNRC, Turkey Point Nuclear  
Plant Project Manager, USNRC, SLRA  
Plant Project Manager, USNRC, SLRA Environmental  
Ms. Cindy Becker, Florida Department of Health

## **Use of Adhesive Anchoring Systems in Structural Supports**

### **Discussion:**

During the development of the referenced Turkey Point Units 3 and 4 Subsequent License Renewal Application (SLRA) First Annual Update, FPL identified that a plant modification was performed in 2018 which modified a safety-related intake cooling water (ICW) pump mounting base. The modification replaced one of the mounting base hold down bolts with a stainless steel plate that was attached to the pump pedestal with two new anchor bolts. The anchor bolts were secured to the pump pedestal using a Hilti HIT-HY 200 epoxy adhesive anchoring system. The use of the epoxy adhesive anchoring system in safety-related applications was previously evaluated by engineering using the commercial grade dedication process. The modification introduced a new material for a structural component within the scope of license renewal. However, the modification package did not perform an aging management review of the epoxy adhesive material and did not identify any associated aging management program(s) necessary to manage aging during the current period of extended operation (PEO).

The failure to identify any aging effects and associated aging management programs for the Hilti HIT-HY 200 epoxy adhesive anchoring system is being addressed for the current licensing basis (CLB) through the corrective action program. As the Hilti HIT-HY 200 epoxy adhesive material was not included in the PTN SLRA or the referenced First Annual Update, FPL will not use the material during the subsequent period of extended operation (SPEO). Therefore, structural supports within the scope of SLR at PTN that utilize the epoxy adhesive material will be restored to the original design, or equivalent, using structural materials evaluated for aging in the SLRA.

A new commitment is added to the PTN SLRA to address this condition prior to entry into the SPEO.

### **Reference:**

FPL Letter L-2019-072 to NRC dated April 1, 2019, Turkey Point Units 3 and 4 Subsequent License Renewal Application First Annual Update (ADAMS Accession Number ML19093A060)

**Associated SLRA Revisions:**

SLRA Table 17-3 is amended as indicated by the following text addition (red underlined font) revisions:

No.	Aging Management Program or Activity (Section)	NUREG-2191 Section	Commitment	Implementation Schedule
<u>56</u>	<u>Materials used in Structural Supports within the Scope of Subsequent License Renewal</u>	<u>N/A</u>	<u>Structural supports within the scope of SLR at PTN that utilize epoxy adhesive material will be restored to the original design, or equivalent, using structural materials evaluated for aging in the SLRA.</u>	<u>No later than 6 months prior to the SPEO, i.e.:</u> <u>PTN3: 1/19/2032</u> <u>PTN4: 10/10/2032</u>

**Associated Enclosures:**

None