

Florida Power

CORPORATION
Crystal River Unit 3
Docket No. 50-302

March 4, 1993
3F0393-08

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

Subject: Intermediate Building Postulated High Energy Line Break

Reference: NRC to FPC letter, dated December 16, 1992 (3N1292-18)

Dear Sir:

Florida Power Corporation (FPC) is submitting this letter in response to the NRC request in the reference letter. The NRC recommended that FPC perform a non-destructive examination (NDE) of the weldolets to main steam header and weldolets to the 6-inch end of the reducers supplying steam to the emergency feedwater pump turbine.

FPC must perform volumetric examination of welds associated with MSV-56 to satisfy an Inservice Inspection (ISI) program requirement. These examinations are required to be performed once in the 40 year operating life of Crystal River Unit 3 (CR-3). The examinations will include the weldolet to main steam header and weldolet to the 6-inch end of the reducer that is connected to valve MSV-56. These examinations will provide reasonable assurance that the condition of the welds associated with both MSV-55 and 56 are consistent with the assumptions in our break analyses. The following information is provided to support our position of examining only the welds associated with MSV-56.

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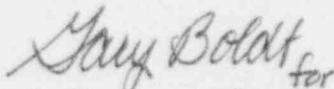
The weldolet connection to the main steam line and the 6-inch end of the reducer which connects to valve MSV-56 were inspected in accordance with the ASME Code Section XI, 1974 Edition using UT techniques in the pre-service period for CR-3. The ISI Program requires that these welds be re-examined sometime in the 40 year operating lifetime of CR-3. Prudent use of resources by FPC dictates that the ISI Program inspection and the NRC-requested inspection should be performed at the same time. Since a baseline condition for the welds in pre-service exists, any changes in the condition of these welds due to operating CR-3 will be noted. Volumetric NDE techniques will be used in the inspection.

1. The material construction and the operating conditions for the connections associated with valve MSV-55 are similar to those for MSV-56. If MSV-56 is found to be acceptable, then it is reasonable to conclude that MSV-55 is, likewise, acceptable.
2. The area around both valves is not easily accessible because of massive jet shields fabricated from $\frac{1}{2}$ " plate and pipe whip restraints composed of heavy structural steel which surround the valves and weldolets. Both locations require installation of temporary lifting and rigging equipment for dismantling the shields and restraints. Scaffolding is also required to gain access to the location of the valves.
3. Asbestos insulation is present and will have to be removed and disposed of. The control and handling of asbestos requires substantial additional safety measures for the protection of personnel. FPC wants to keep the asbestos insulation disposal expense to a minimum.
4. Several factors decrease the probability of a catastrophic pipe rupture. A double-ended guillotine rupture of the 6-inch or the 3-inch reducer ends is not probable because the configuration of shields and restraints preclude significant movement of the pipe (other than thermal expansion). The most probable pipe failure is a pipe split which does not create an environmental problem in the building. A split would leak before it failed and would be visible and audible in the course of the routine inspections performed by our operations personnel.
5. System walkdowns are performed every 40 months with the piping at normal operating temperature and pressure.

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The ISI examinations have been submitted for inclusion in the Refuel 9 outage currently scheduled to begin in April 1994. The work will be evaluated with all other items submitted based on priority and available resources. Detailed planning for the preliminary outage scope will be completed by October 1993. FPC will inform the NRC by November 30, 1993 whether the examinations will be included in Refuel 9.

Sincerely,

Handwritten signature of Gary Boldt in cursive script.

for
P. M. Beard, Jr.
Senior Vice President
Nuclear Operations

PMB/JWT

xc: Regional Administrator, Region II
Senior Resident Inspector
NRR Project Manager