

From: Brown, Eva
Sent: Thursday, October 14, 2021 10:55 AM
To: stavroula.mihalakea@fpl.com; Mack, Jarrett
Cc: Mitchell, Matthew; Wrona, David
Subject: Request for Additional Information - Fifth Ten-Year Inservice Inspection Interval Relief Request No.10 - Extension (L-2021-LLR-0077)
Attachments: 007778 Final RAI.pdf

On October 8, 2021, the U.S. Nuclear Regulatory Commission (NRC) staff sent Florida Power and Light (FPL) a Request for Additional Information (RAI). The RAI is related to a September 30, 2021 (ADAMS Accession No. ML21273A240) request for an alternative from the ASME Code that allows the repair of a Unit 3 Intake Cooling Water spool piece approximately six months after the current refueling outage.

On October 12, 2021, the NRC staff met with FPL to provide clarifying information concerning the RAIs. Editorial corrections were identified which are reflected in the attached final RAI.

Mr. Catron agreed to provide a response to the attached RAI no later than October 15, 2021. The NRC staff also informed the licensee that a publicly available version of this

Should you have any questions, please feel free to contact me.

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REQUEST FOR ADDITIONAL INFORMATION
ALTERNATIVE RELATED TO
INTAKE COOLING WATER SPOOL PIECE REPAIR
TURKEY POINT NUCLEAR PLANT, UNIT 3
DOCKET NO. 50-250

Paragraph 50.55a(z)(2) to Title 10 to the *Code of Federal Regulations* (10 CFR) authorizes the Director, Office of Nuclear Reactor Regulation, to approve alternatives to the requirements of paragraphs (b) through (h) of 10 CFR 50.55a.

The licensee has requested an alternative based on hardship without a compensating increase in quality and safety. It is the NRC staff's understanding that in part the licensee is requesting to obtain authorization of the continued use of Code Case N-513-4 due to hardship or unusual difficulty without a compensating increase in the level of quality and safety and the NRC approval of the non-Code alternative repair (i.e., the "restoration clamp assembly") will be addressed in a separate ASME Code alternative request.

In order to complete the review of the proposed alternative related to continued use of Code Case N-513-4 past the current RFO, the NRC staff needs the following information.

1. Code Case N-513-4 requires a repair/replacement be performed at the next scheduled refueling outage (RFO). The licensee is requesting the repair/replacement to be extended until approximately 6 months following the RFO.

Please provide the licensee's analysis which demonstrates that structural integrity will be maintained for this extended time period. This should include the information regarding the degraded location, which has been gathered based on ultrasonic examination and leakage monitoring since the leak was discovered in March 2020.

2. Section 4.0 of the submittal discusses some other considered repair options. Discuss the specific hardship for not performing each of the repair methods evaluated by FPL to repair the through wall leak and provide supporting detail, which addresses the identified adverse risk to the plant.
3. Code Case N-513-4 provides certain compensatory measures to support continued operation until the next RFO. Given the request goes beyond the scope of the NRC approval, describe those measures intended to monitor the structural integrity of the ICW system during the six-month extension past the end of the RFO. For each action, justify any additional assurance that would be provided regarding the integrity of the component.

4. In section 4.0 of the submittal it states the, "likely cause of the defect is [inside diameter] ID corrosion due to localized degradation of the concrete liner." Describe the operating experience with ID corrosion of the ICW System.