From:	Brown, Eva
Sent:	Monday, October 25, 2021 9:14 AM
To:	stavroula.mihalakea@fpl.com; Mack, Jarrett
Cc:	Mitchell, Matthew; Wrona, David
Subject:	FINAL: TPN Request for Additional Information - Round 2 Concerning Relief Request 10 - Extension EPID: L-2021-LLR-0077
Attachments:	007778 Final RAI Round2.pdf

Ms. Mihalakea,

On October 20, 2021 the U.S. Nuclear Regulatory Commission (NRC) staff sent Florida Power and Light (FPL, or the licensee) a draft Request for Additional Information (RAI). 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. In a letter dated September 30, 2021, as supplemented by a letter dated October 15, 2021 (Agencywide Document and Management System (ADAMS) Nos. ML21273A240 and ML21288A544, respectively), FPL requested an alternative based on hardship without a compensating increase in quality and safety. This RAI relates to a request for an alternative from the ASME Code concerning an extension to the time to use a non-Code repair to correct a through-wall leak in the intake cooling water spool piece. On October 21, 2021, FPL subsequently informed the NRC staff that the information requested was understood and no additional clarification of the RAI was necessary. You agreed on October 24, 2021 to provide a response to the attached final RAI by October 25, 2021. The NRC staff also informed the licensee that a publicly available version of this final RAI would be placed in ADAMS.

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

Eva Brown
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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. In a letter dated September 30, 2021, as supplement by a letter dated October 15, 2021 (Agencywide Document and Management System (ADAMS) Nos. ML21273A240 and ML21288A544, respectively), Florida Power and Light (FPL, or the licensee) requested an alternative based on hardship without a compensating increase in quality and safety. For Class 3 components, American Society of Mechanical Engineers Boiler and Pressure Vessel (ASME BPV) Code Section XI provides specific criteria for determining whether a component is "acceptable for service." Consistent with Code Case N-513-4, "Evaluation of Criteria for Temporary Acceptance of Flaws in Moderate Energy Class 2 or 3 Piping, Section XI, Division 1" (N-513) the integrity and therefore the operability of the intake cooling water (ICW) system must be restored prior to the Unit 3 emerging from the next refueling outage, unless approval of an alternative is approved by the NRC staff.

1) In the submittal and the supplement dated October 15, 2021 (the supplement), the licensee described several ASME Code compliant repair options for the through-wall leak in the ICW piping. Based on the unusual configurations identified, discuss how replacing the spool piece represents a challenge. Specifically, address the operational and logistical challenges for the repair activity. This discussion should include some detail associated with providing a temporary heat exchanger and flow paths for the ICW and component cooling water (CCW) systems, additional back up plans and coordination of onsite resources associated with temporary tie ins to existing plant equipment in order to maintain the required systems operable for the applicable modes of operation.

2) Paragraphs 2(e) and 3.2(c) of ASME Code Case N-513 requires that the flaw growth analysis shall consider all relevant growth mechanisms. However, based on the thinned wall area next to the valve, it is not certain that only general corrosion is relevant. Since FPL has not confirmed a definitive degradation mechanisms for this area to be used in the flaw growth analysis, ASME Code Case N-513 paragraph 2(e) specifies frequent periodic inspections to measure wall thickness to occur at least every 30 days.

   The submittal currently specifies walkdowns once per day, consistent with ASME Code Case N-513, for leakage rate monitoring. To extend the use of ASME Code Case N-513 for a period of six months beyond what is currently allowed by ASME Code Case N-513 (current refueling outage), the NRC staff notes that the supplement provided additional compensatory actions beyond those required by ASME Code Case N-513 by increasing

the frequency for leakage rate monitoring walkdowns by a factor of two (i.e., twice per day).

Justify why a similar increase in frequency (factor of two) should not be applied for the compensatory action of periodic inspections to measure wall thickness to extend the use of ASME Code Case N-513 for a period of six months beyond this current refueling outage to provide assurance regarding the integrity of the component.

3) As discussed in the supplement, the licensee identified leakage monitoring related activities. For these activities, provide the criteria and time frames for operational decision-making relating to ensuring the operability of the ICW piping during the proposed extended period.