



April 7, 2022
L-2022-065

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555-00001

Re: Turkey Point Unit 4
Docket No. 50-251
Subsequent License Renewal License Condition Completion Notification

In accordance with Turkey Point Unit 4 Subsequent Renewed License No. DPR-41, Subsequent License Renewal License Conditions, Section J.3 (See attached), Florida Power & Light Company (FPL) notifies the Nuclear Regulatory Commission (NRC) herein that Turkey Point Unit 4 has completed the replacement of a portion of the existing containment spray system carbon steel piping with stainless steel piping during the 2019, 2020 & 2022 Turkey Point Unit 4 Refueling Outages.

The scope of replacement was the carbon steel piping for the two containment spray piping headers (4A and 4B) at penetrations P-19A and P-19B to a minimum 65 ft plant elevation inside containment. Condition Report AR # 2340249 documents the elevation of the air-to-borated water interface inside the piping. Inspections revealed that the air-to-borated-water interface inside the A header piping was located approximately between the 54 and 69 ft elevation. The air-to-borated-water interface inside the B header piping was located approximately between the 63 and 75 ft elevation. The actual piping cut line for Containment Spray Piping header 4A was changed to approximately the 71 ft elevation and for the 4B header was changed to the 83 ft elevation to ensure the replaced stainless steel piping provides additional margin to the air-to borated-water interface inside the piping.

FPL confirms that any of the remaining carbon steel piping will not be internally exposed to stagnant borated water during the subsequent period of extended operation.

Should there be any questions concerning this report, please contact Mr. Robert J. Hess, Licensing Manager, at 305-246-4112.

Sincerely,

A handwritten signature in blue ink, appearing to be 'R. Hess', is written over a horizontal blue line.

Robert J. Hess
Licensing Manager
Turkey Point Nuclear Plant

Attachment

cc: Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant

Referenced Section Attached
Turkey Point Unit 4 Subsequent Renewed License No. DPR-41,
Subsequent License Renewal License Conditions, Section J.3 Pages 7 and 8

2. The risk assessment approach and methods, shall be acceptable to the NRC, be based on the as-built, as-operated, and maintained plant, and reflect the operating experience of the plant as specified in RG 1.200. Methods to assess the risk from extending the completion times must be PRA methods accepted as part of this license amendment, or other methods approved by the NRC for generic use. If the licensee wishes to change its methods, and the change is outside the bounds of this license condition, the licensee will seek prior NRC approval via a license amendment.

J. Subsequent License Renewal License Conditions

1. The information in the Final Safety Analysis Report (FSAR) supplement submitted pursuant to 10 CFR 54.21(d), as revised during the subsequent license renewal application review process, and FPL commitments as listed in Appendix A of the "Safety Evaluation Report Related to the Subsequent License Renewal of Turkey Point Generating Units 3 and 4," dated July 22, 2019, are collectively the "Subsequent License Renewal FSAR Supplement." This Supplement is henceforth part of the FSAR, which will be updated in accordance with 10 CFR 50.71(e). As such, FPL may make changes to the programs, activities, and commitments described in the Subsequent License Renewal FSAR Supplement, provided FPL evaluates such changes pursuant to the criteria set forth in 10 CFR 50.59, "Changes, Tests, and Experiments," and otherwise complies with the requirements in that section.
2. The Subsequent License Renewal FSAR Supplement, as defined in renewed license condition (J)(1) above, describes programs to be implemented and activities to be completed prior to the subsequent period of extended operation, which is the period following the April 10, 2033, expiration of the initial renewed license.
 - a. FPL shall implement those new programs and enhancements to existing programs no later than 6 months before the subsequent period of extended operation.
 - b. FPL shall complete those activities by the 6-month date prior to the subsequent period of extended operation or by the end of the last refueling outage before the subsequent period of extended operation, whichever occurs later.
 - c. FPL shall notify the NRC in writing within 30 days after having accomplished item (2)(a) above and include the status of those activities that have been or remain to be completed in item (2)(b) above.
3. FPL shall complete the replacement of a portion of the existing containment spray system carbon steel piping with stainless steel piping by December 1, 2024, so that any remaining carbon steel piping will not normally be internally exposed to borated water during the subsequent period of extended operation. The scope of replacement is the carbon steel piping from the stainless steel to the carbon steel dissimilar metal weld for the two containment spray piping headers (4A and 4B) at penetrations P-19A and P-19B to a minimum plant elevation of 65 feet inside containment. FPL shall notify the NRC in writing within 60 days following completion of the refueling outage during which the piping replacement is completed. The notification will confirm the elevation of

the air-to-borated water interface inside the piping, and confirm that the installation of the stainless steel piping exceeds this elevation.

4. This subsequent renewed license is effective as of the date of issuance, and shall expire at midnight April 10, 2053.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Ho K. Nieh, Director
Office of Nuclear Reactor Regulation

Attachments:

Appendix A - Technical Specifications for Unit 4

Appendix B - Environmental Protection Plan

Date of Issuance: December 4, 2019