



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

May 10, 2022

Mr. Bob Coffey
Executive Vice President, Nuclear
and Chief Nuclear Officer
Florida Power & Light Company
700 Universe Blvd.
Mail Stop: EX/JB
Juno Beach, FL 33408

SUBJECT: TURKEY POINT NUCLEAR GENERATING UNIT NOS. 3 AND 4 –
AUTHORIZATION OF RELIEF REQUEST NOS. 8 AND 9 REGARDING
EXTENSION OF INSPECTION INTERVAL FOR REACTOR PRESSURE
VESSEL WELDS (EPID L-2021-LLR-0038)

Dear Mr. Coffey:

By letter dated May 13, 2021, as supplemented by letter dated September 14, 2021, Florida Power & Light Company (the licensee) proposed an alternative to the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (BPV) Code, Section XI, IWB-2411, "Inspection Program," at the Turkey Point Nuclear Generating Unit Nos. 3 and 4.

Specifically, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(z)(1), the licensee submitted Relief Request Nos. 8 and 9, which requested approval to extend the inservice inspection (ISI) interval for the Turkey Point reactor pressure vessel (RPV) welds from 2023 to 2033 for Unit 3 and 2034 for Unit 4. The licensee proposes to implement an alternative to the requirement of ASME Section XI IWB-2411, "Inspection Program," that volumetric examination of RPV Examination categories B-A and B-D be performed once each 10-year ISI interval. The current Fifth Ten-Year Inservice Inspection (ISI) interval ends on February 21, 2024, for Unit 3 and April 14, 2024, for Unit 4. The licensee proposes to perform the fifth ASME Section XI, Category B-A and B-D examinations in the sixth ISI interval, no later than 2033 for Unit 3 and 2034 for Unit 4.

The NRC staff finds the licensee has demonstrated that its proposed alternative provides an acceptable level of quality and safety in lieu of complying with the ASME Section XI requirements and inspection items specified and referenced in Relief Request Nos. 8 and 9. Accordingly, the NRC staff concludes that the licensee has adequately addressed all of the regulatory requirements set forth in 10 CFR 50.55a(z)(1).

Therefore, the NRC staff authorizes the use of proposed alternative Relief Request Nos. 8 and 9 at Turkey Point Nuclear Generating Unit Nos. 3 and 4, for the current fifth 10-Year ISI interval and for the duration of the sixth 10-Year ISI interval of each unit.

All other ASME BPV Code, Section XI, requirements for which relief was not specifically requested and approved in this relief request remain applicable, including third-party review by the Authorized Nuclear Inservice Inspector.

If you have any questions, please contact Michael Mahoney at 301-415-3867 or via email at Michael.Mahoney@nrc.gov.

Sincerely,

David J. Wrona, Chief
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-250

Enclosure:
Safety Evaluation

cc: Listserv



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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SAFETY EVALUATION BY THE OFFICE NUCLEAR REACTOR REGULATION

RELIEF REQUEST NOS. 8 AND 9

EXTENSION OF INSPECTION INTERVAL FOR REACTOR PRESSURE VESSEL WELDS

TURKEY POINT NUCLEAR GENERATING UNIT NOS. 3 AND 4

DOCKET NOS. 50-250 AND 50-251

1.0 INTRODUCTION

By letter May 13, 2021, as supplemented by letter dated September 14, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML21134A150 and ML21258A379, respectively), Florida Power & Light Company (FPL, the licensee) proposed an alternative to the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (BPV) Code, Section XI, IWB-2411, "Inspection Program," at the Turkey Point Nuclear Generating, Unit Nos. 3 and 4 (Turkey Point).

Specifically, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(z)(2), the licensee submitted Relief Request Nos. 8 and 9, which requested approval to extend the inservice inspection (ISI) interval for the Turkey Point reactor pressure vessel (RPV) welds from 2023 to 2033 for Unit 3 and 2034 for Unit 4. The licensee proposes to implement an alternative to the requirement of ASME Section XI IWB-2411, "Inspection Program," that volumetric examination of RPV Examination categories B-A and B-D be performed once each 10-year ISI interval.

The current Fifth Ten-Year Inservice Inspection (ISI) interval ends on February 21, 2024, for Unit 3 and April 14, 2024, for Unit 4. The licensee proposes to perform the fifth ASME Section XI, Category B-A and B-D examinations in the sixth ISI interval, no later than 2033 for Unit 3 and 2034 for Unit 4.

2.0 REGULATORY EVALUATION

Regulatory Requirements

Adherence to Section XI of the ASME Code is mandated by 10 CFR 50.55a(g)(4), which states, in part, that ASME Code Class 1, 2, and 3 components will meet the requirements, except the design and access provisions and the pre-service examination requirements, set forth in the ASME Code, Section XI.

Paragraph 10 CFR 50.55a(z) states, in part, that alternatives to the requirements of 10 CFR 50.55a(b) through (h) may be used, when authorized by the Director, Office of Nuclear Reactor Regulation, if (1) the proposed alternatives would provide an acceptable level of quality and safety or (2) compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

10 CFR 50.61a, "Alternate Fracture Toughness Requirements for Protection Against Pressurized Thermal Shock Events."

10 CFR 50.61, "Fracture Toughness Requirements for Protection Against Pressurized Thermal Shock Events."

Guidance and Additional Information

NRC Regulatory Guide (RG) 1.99, Revision 2, "Radiation Embrittlement of Reactor Vessel Materials," dated May 1988 (ML003740284).

RG 1.174, Revision 3, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," dated January 2018 (ML17317A256).

NRC, NUREG-1874, "Recommended Limits for Pressurized Thermal Shock (PTS)," dated March 2010 (ML15222A848).

3.0 TECHNICAL EVALUATION

3.1 ASME Code Components Affected

The affected components are the Turkey Point, Units 3 and 4 reactor vessels (RVs), specifically, the following ASME Code, Section XI examination categories and item numbers covering examinations of the RVs. These examination categories and item numbers are from IWB-2500 and Table IWB-2500-1 of the ASME Code, Section XI.

Examination Category	Item Number	Description
B-A	B1.10	Shell Welds
B-A	B1.11	Circumferential Shell Welds
B-A	B1.20	Head Welds
B-A	B1.21	Circumferential Head Welds
B-A	B1.30	Shell-to-Flange Weld
B-D	B3.90	Nozzle-to-Vessel Welds
B-D	B3.100	Nozzle Inside Radius Section

Note: Category B-A welds are defined as "Pressure Retaining Welds in Reactor Vessel." Category B-D welds are defined as "Full Penetration Welded Nozzles in Vessels."

3.2 Applicable Code Edition, Addenda, and Requirements

The fifth 10-Year ISI Interval for Turkey Point, Unit 3, is scheduled to end on February 21, 2024. The fifth 10-Year ISI Interval for Turkey Point, Unit 4, is scheduled to end on April 14, 2024. The

ASME Code of Record for both units is ASME Code, Section XI, 2007 Edition through 2008 Addenda.

The IWB-2411 of the ASME Code, Section XI, Inspection Program, requires volumetric examination of essentially 100% of RV pressure-retaining welds identified in Table IWB-2500-1 once each 10-year interval. The applicable ASME Code for the sixth 10-year ISI interval will be selected in accordance with the requirements of 10 CFR 50.55a. The licensee proposes to perform the fifth ASME Section XI Category B-A and B-D examinations no later than 2033 for Unit 3 and 2034 for Unit 4.

3.3 Reason for Request

The licensee proposed an alternative from the requirement of the IWB-2411 Inspection Program, that volumetric examination of essentially 100% of RV pressure-retaining Examination Category B-A and B-D welds be performed once each 10-year interval. The licensee stated that extension of the interval between examinations of Category B-A and B-D welds from 10 years to up to 20 years will result in a reduction in man-rem exposure and examination costs.

3.4 Licensee's Proposed Alternative

The licensee proposed to not perform the ASME Code required volumetric examination of the Turkey Point, Units 3 and 4, RV full penetration pressure-retaining Examination Category B-A and B-D welds for the fifth 10-Year ISI interval. Instead, the licensee will perform these volumetric examinations in the sixth 10-Year ISI interval. The licensee stated that the proposed inspection dates are consistent with the latest revised implementation plans. The licensee further stated in accordance with 10 CFR 50.55a(z)(1), an alternate inspection interval is requested on the basis that the current interval can be revised with negligible change in risk by satisfying the risk criteria specified in RG 1.174, Revision 3.

3.5 Licensee's Bases for Use

In accordance with 10 CFR 50.55a(z)(1), the licensee proposed an alternate inspection interval on the basis that the current interval can be revised with negligible change in risk by satisfying the risk criteria specified in RG 1.174, Revision 3. The licensee stated that the methodology used to conduct this analysis is based on that defined in the study WCAP-16168-NP-A, Revision 3, "Risk-Informed Extension of the Reactor Vessel In-service Inspection Interval" (ML11306A084; henceforth referred to as WCAP-A in this safety evaluation). The licensee stated that they compared the results of the calculations for Turkey Point, Units 3 and 4, to those obtained from the Westinghouse pilot plant evaluated in WCAP-16168-NP-A, Revision 3. The licensee stated that the parameters for Turkey Point, Units 3 and 4, are bounded by the results of the Westinghouse pilot plant evaluation.

3.6 Duration of Proposed Alternative

The licensee requests NRC approval and authorization to defer performance of the required volumetric inspections from the fifth 10-Year ISI interval to the sixth 10-Year ISI interval for Turkey Point, Units 3 and 4.

3.7 NRC Staff Evaluation

3.7.1 Licensee's Methodology and Flaw Evaluation Assessment Basis

The licensee's alternate ISI requirements in RR8 and RR9 are based on a risk-informed RV fracture analysis that was performed in accordance with the NRC staff-approved, risk-informed flaw analysis methods in WCAP-16168-NP-A, Revision 3. The methodology in WCAP-A was developed by the Pressurized Water Reactor Owners Group (PWROG) to satisfy the 95th percentile total through-wall cracking frequency (TWCF_{95-TOTAL}) criteria for pressurized water reactors (PWRs) established in NRC NUREG-1874 and the delta large early release frequency (ΔLERF) criteria that are specified in RG 1.174. The analyses in RR8 and RR9 include the risk-informed flaw evaluation tables and component-specific and total through-wall cracking frequency results (i.e., TWCF_{95-XX} and TWCF_{95-TOTAL} parameter results) that were called for in the WCAP-A methodology.

Based on these criteria, the NRC may grant authorization of the risk-informed ISI request using the ΔLERF criteria specified in RG 1.174 if the licensee can demonstrate that: (1) the TWCF_{95-TOTAL} value for the Turkey Point, Units 3 and 4, RV is less than a maximum, upper-bound TWCF_{95-TOTAL} of 1.76×10^{-8} events per reactor year (as specified in WCAP-A for Westinghouse-designed PWRs), and (2) the proposed ISI interval extension will not result in a ΔLERF in excess of 1.0×10^{-7} events per reactor year.

3.7.2 Analysis Parameters Used for These Types of Risk-Informed Alternatives

The NRC staff defines the risk-informed parameters and the type of data requested for these types of relief request submittals, along with the minimum PWR pilot-plant acceptance criteria defined for those parameters in Section 3.4 of the NRC staff's July 26, 2011, safety evaluation (SE) (ML111600303) for WCAP-A. For comparisons to Turkey Point, Units 3 and 4, the acceptance criteria for the parameters of reference in WCAP-A are based on those that were established for the evaluation of the Beaver Valley Power Station, Unit No. 1 (Beaver Valley, Unit 1), nuclear power plant design in WCAP-A. The NRC staff's evaluations of licensee's risk-informed parameter results are given in the SE subsections that follow.

3.7.3 Identification of Limiting Design Basis Transients

In the NRC staff's SE dated July 26, 2011, for WCAP-A, the NRC staff requested confirmation that the dominant transients for PWR pressurized thermal shock (PTS) in NRC PTS Risk Study (i.e., NUREG-1874) are applicable as the dominant design basis transients for the licensee's proposed risk-based alternative. The NRC staff also requested information relative to the design of the RV cladding layer.

Regarding the PTS transients, the licensee identified (in Table 1 of Attachments 1 and 2 for RR8 and RR9, respectively) that the transients are defined in NRC letter report, "Generalization of Plant-Specific Pressurized Thermal Shock (PTS) Risk Results to Additional Plants" (ML042880482; henceforth referred to as the "NRC PTS Generalization Study") and that those transients serve as the limiting design basis transients for the RV welds that were assessed in RR8 and RR9. The NRC staff verified that, for Westinghouse-type PWRs like Turkey Point, Units 3 and 4, the PWROG's methodology in WCAP-A uses the PTS transients that were defined in NUREG-1874 and clarified in the PTS Generalization Study as the limiting PTS transients for the PWROG's risk-informed flaw analysis that was included in WCAP-A.

Therefore, the NRC staff finds the licensee's transient basis to be acceptable based on the information in NUREG-1874 and the PTS Generalization Study, and the NRC staff's conclusions in the July 26, 2011, SE for WCAP-A that establish that the PTS transient characteristics for a given nuclear steam supply shutoff system (NSSS) design of U.S. PWR light water reactor facilities are generically applicable for all PWRs designed by the same reactor NSSS vendor.

Regarding the cladding layers, the licensee reported that the cladding for the RVs at Turkey Point, Units 3 and 4, were deposited using a "single layer." The NRC staff noted that the design of the RV cladding layers at Turkey Point, Units 3 and 4, is consistent with the design of the cladding layer in the Beaver Valley, Unit 1, RV. Thus, for the proposed alternative, the NRC staff concludes that the licensee did not need to evaluate the impacts that multiple pass layers would have on the design of the RV cladding at Turkey Point, Units 3 and 4, because: (1) the cladding layer for each unit were deposited as a single austenitic stainless layer, and (2) the design of the cladding layer for each unit is consistent with and bounded by the NRC staff's assessment of the Beaver Valley, Unit 1, cladding layer in the NRC staff's SE of July 26, 2011 for WCAP-A.

3.7.4 Frequency and Severity of Design Basis Transients

In the NRC staff's SE of July 26, 2011, for WCAP-A, the NRC staff established its position that licensees submitting risk-informed ISI extension alternatives for their RVs should report whether the frequency of the limiting design basis transients during past plant operations are less than the frequency of the design basis transients identified in WCAP-A report as being significant contributors to fatigue. In Table 1 of Attachments 1 and 2, for RR8 and RR9, respectively, the licensee stated that the frequency of allowed heatups and cooldowns per reactor year is bounded by the 7 cycles/reactor year value that was set as an upper bound limit for Westinghouse-designed PWRs in WCAP-A. The NRC staff confirmed that, in the NRC staff-approved WCAP-A methodology, 7 cycles/reactor year was established as the maximum bounding frequency of reactor heatup and cooldowns that could occur (per reactor year) for Westinghouse-designed PWRs. Therefore, the NRC staff found that the licensee has acceptably addressed plant-specific information demonstrating that the limiting design basis transients during prior plant operation are less than the frequency of the design basis transients identified in the PWROG fatigue analysis that are considered to significantly contribute to fatigue crack growth.

3.7.5 Scope and Schedule for Inspecting the RV Welds During the 20-Year ISI Interval

In the NRC staff's SE of July 26, 2011, for WCAP-A, the NRC staff stated that licensees submitting risk-informed ISI extensions for their RVs should identify ISI schedule for RV weld examinations that will be performed during the proposed 20-Year ISI Interval. The SE also established the NRC staff's position that the dates for the weld inspections must be within one refueling cycle of the revised dates identified for inspection in the implementation plan in PWROG Letter No. OG-10-238 (ML11153A033).

In Table 2 to Section 5 of Attachment 1 for RR8, the licensee states that the proposed alternative would defer the resulting ISI inspections of the applicable RV weld components from year 2023 in the Fifth 10-Year ISI interval to 2033 in the Sixth 10-year ISI interval for the Turkey Point, Unit 3.

In Table 2 to Section 5 of Attachment 2 for RR9, the licensee states that the proposed alternative would defer the resulting ISI inspections of the applicable RV weld components from year 2023 in the Fifth 10-Year ISI interval to 2034 in the Sixth 10-year ISI interval for the Turkey Point, Unit 4. By letter dated September 14, 2021, the licensee provided additional information regarding the previous volumetric ISI examinations described in Table 2 to attachments 1 and 2 for RR8 and RR9, respectively. Specifically, the licensee confirmed that the Fourth 10-year ISI examinations were performed in 2014 and were the first examinations that detected the flaw indication evaluated in Table 2 of attachment 1 for RR8. The licensee stated there was no site-specific flaw growth data available for this indication and that the indication was indicative of a fabrication flaw typical of a small slag inclusion.

The NRC staff verified that the licensee had included the inspection schedule for the RV welds in RR8 and RR9 and that the proposed RV weld inspections in 2033 and 2034 are within one cycle of the time for performing the ISI inspections in PWROG Letter No. OG-10-238.

Under this alternative ISI interval basis, the licensee will be required under 10 CFR 50.55a(z)(1) and the alternate relief request basis to perform and complete the required ISI inspections of the specified RV welds and nozzle inner radius section locations by February 21, 2033, for Turkey Point, Unit 3, and by April 14, 2034, for Turkey Point, Unit 4 (which corresponds to the end of the Sixth 10-Year ISI interval for each unit).

3.7.6 Relevant Operating Experience - Summary of ISI Inspection Results

In the NRC staff's SE of July 26, 2011, for WCAP-A, the NRC staff established its position that licensees submitting risk-informed ISI extensions for their RVs should report the results of its prior ISI inspections of the applicable RV weld locations. The NRC staff noted that in Table 2 of Attachments 1 and 2 for RR8 and RR9, respectively, the licensee identified that it performed four past volumetric ISI examinations and one pre-service inspection of the RV pressure retaining for each unit. The licensee reported that for Turkey Point, Unit 3, there were a total of 19 indications that were reported as being detected during the most recently completed ISI. These flaws were located in the upper shell forging to intermediate shell forging circumferential weld seam and the intermediate shell forging to lower shell forging circumferential weld seam. The licensee also stated that the 19 flaw indications were found to be acceptable without need for repair per the acceptance criterion in ASME Section XI, Table IWB-3510-1. Of these 19 indications, the licensee reported that one of the indications was located within the inner 1/10th or inner 1 inch of the RV wall thickness and required additional evaluation in accordance with the flaw evaluation requirements in the alternate PTS rule (i.e., 10 CFR 50.61a). Table 2 of Attachment 1 to RR8 provided the disposition of the flaw against the limits of the alternate PTS rule.

For Turkey Point, Unit 4, the licensee reported that there was a total of 26 indications that were reported as being detected during the most recently completed ISI. These flaws were located in the upper shell forging to intermediate shell forging circumferential weld seam, the intermediate shell forging to lower shell forging circumferential weld seam, and the lower shell forging to the lower head ring circumferential weld seam. The licensee also stated that the 26 flaw indications were found to be acceptable without need for repair per the acceptance criterion in ASME Section XI, Table IWB-3510-1. Of these 26 indications, the licensee reported that none of the indications were located within the inner 1/10th or inner 1 inch of the RV wall thickness. Therefore, no additional evaluation in accordance with the flaw evaluation requirements in the alternate PTS rule is necessary for Turkey Point, Unit 4.

For Turkey Point, Unit 3, the NRC staff confirmed that the licensee evaluated the flaw in accordance with the flaw evaluation and flaw distribution criteria in WCAP-A, which are based on the alternate PTS rule. The NRC staff also verified that the flaw distribution assessments in RR8 and RR9 demonstrated that: (1) number of flaws in the specified flaw distribution ranges were bounded by the maximum number of flaws allowed for those flaw ranges in WCAP-A, and (2) no assessed flaw was projected to exceed the maximum allowable flaw size specified and approved in WCAP-A. Based on this review, the NRC staff finds that the licensee has appropriately addressed the ISI history in RR8 and RR9 because the licensee demonstrated, as applicable, that any flaws detected in the RV welds will meet the flaw distribution criteria and allowable flaw sizes for detected flaws in WCAP-A, including conservative estimates to account for potential fatigue flaw growth of the flaws through the end of the Sixth 10-Year ISI interval for each unit.

3.7.8 Applicability of Section (e) in 10 CFR 50.61a

The NRC staff verified that the licensee does not need to include the information required by Section (e) of 10 CFR 50.61a in RR8 or RR9 since the scope of RR8 and RR9 only requests NRC staff authorization to extend the applicable RV inspections to the end of the Sixth 10-Year ISI interval. Therefore, the NRC staff concludes that it is not applicable for the licensee to include the information required by 10 CFR 50.61a(e).

3.7.9 Through-Wall Crack Frequency Assessment

In the NRC staff's SE of July 26, 2011, for WCAP-A, the NRC staff established its position that the maximum adjusted reference temperatures and 30 foot-pound (ft-lb) shifts in adjusted referenced temperature (ΔT_{30}) values may be calculated using the methods documented in the latest version of RG 1.99, Revision 2, or in an alternate NRC-approved methodology using these types of parameters.

NRC staff reviewed plant-specific information which addresses TWCFs. The licensee provided this information in Table 3 of Attachments 1 and 2 for RR8 and RR9, respectively, which contains calculation inputs such as chemistry factors, unirradiated nil-ductility transition reference temperatures (RT_{NDT}), and neutron fluence values for the RV materials in the beltline. The licensee calculated TWCF for each limiting material (i.e., axial weld, circumferential weld, plate, and forging) in each unit, using the WCAP-A methodology. The licensee identified the use of RG 1.99, Revision 2, Position 1.1 (surveillance data not available) or Position 2.1 (surveillance data available) for each beltline material, to calculate ΔT_{30} , which is an input for the TWCF calculations.

In Table 3 of Attachments 1 and 2 for RR8 and RR9, respectively under a section titled "Outputs," the licensee provided the TWCF for each limiting material and the $TWCF_{95-TOTAL}$ values for each unit obtained using the WCAP-A methodology. Using the licensee inputs, the NRC staff has verified the licensee's calculated ΔT_{30} values, TWCF values for the limiting materials in each RV and the resulting $TWCF_{95-TOTAL}$ for Turkey Point, Units 3 and 4. Based on this, the NRC staff found that the $TWCF_{95-TOTAL}$ for Turkey Point, Units 3 and 4, are significantly lower than the value of 1.76E-08 for the Westinghouse pilot plant in the WCAP-A. Therefore, the NRC staff found that the licensee has addressed plant-specific information satisfactorily, and that the embrittlement of the Turkey Point, Units 3 and 4, RVs is within the bounds used in the Westinghouse pilot plant analysis.

3.7.10 NRC staff Evaluation Summary

The NRC staff has reviewed the licensee's submittal and determined that it has provided acceptable plant-specific information identified in the SE for WCAP-A. For the risk-informed parameter, $TWCF_{95-TOTAL}$, the NRC staff performed independent calculations to verify the input data and output results in Table 3 to Attachments 1 and 2 of RR8 and RR9, respectively. The NRC staff verified that the licensee's calculations were acceptable. Based on the NRC staff's review and verification of input data and output results, the NRC staff determined that the proposed alternative is based on the WCAP-A methodology and that the $TWCF_{95-TOTAL}$ values for Turkey Point, Units 3 and 4, are bound by the corresponding pilot plant parameter in the WCAP-A. Consequently, the NRC staff determined that the licensee has demonstrated that the proposed alternative meets the guidance provided by RG 1.174, Revision 1, for risk-informed decisions and, therefore, will provide an acceptable level of quality and safety.

Based on these criteria, the NRC staff finds the licensee has demonstrated that its proposed risk-informed alternative provides an acceptable level of quality and safety in lieu of complying with the ASME Section XI requirements and inspection items specified and referenced in RR8 and RR9.

4.0 CONCLUSION

The NRC staff has determined that the proposed alternative in the licensee's request referenced above would provide an acceptable level of quality and safety.

The NRC staff concludes that the licensee has adequately addressed the regulatory requirements set forth in 10 CFR 50.55a(z)(1).

The NRC staff authorizes the use of proposed alternative RR8 and RR9 at Turkey Point, Units 3 and 4, for the current fifth 10-Year ISI interval and for the duration of the sixth 10-Year ISI interval of each unit.

All other ASME BPV Code, Section XI, requirements for which an alternative was not specifically requested and authorized remain applicable, including third-party review by the Authorized Nuclear Inservice Inspector.

Principal Contributor: C. Fairbanks, NRR

Date: May 10, 2022

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