July 3, 2025
L-2025-094

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington D C 20555-0001

RE: Turkey Point Nuclear Plant, Units 3 and 4
Docket Nos. 50-250 and 50-251
Subsequent Renewed Facility Operating Licenses DPR-31 and DPR-41

Notification of Removal of Six Safety-Related Valves from the MOV Periodic Verification Testing Program

Reference:

1. Florida Power & Light Company Letter L-1994-196 to NRC, "Confirms Completion of all Design-Basis Reviews, Analyses, Verifications, Tests and Inspections Performed to Comply with Items A through H of GL 89-10 for Turkey Point Unit 3, per GL 89-10 Item M," dated August 15, 1994

2. Florida Power & Light Company Letter L-1995-023 to NRC, "Confirms Completion of all Design-Basis Reviews, Analyses, Verifications, Tests and Inspections Performed to Comply with Items A through H of GL 89-10 for Turkey Point Unit 4, per GL 89-10 Item M," dated February 2, 1995

3. Florida Power & Light Company Letter L-1999-136 to NRC, "Turkey Point Units 3 and 4, Docket Nos. 50-250 and 50-251, Response to Request for Additional Information Generic Letter 96-05 - Periodic Verification of Design-Basis Capability of Safety-Related Motor-Operated Valves," dated June 18, 1999

4. NRC Letter to Florida Power & Light Company, "Safety Evaluation of Licensee Response to Generic Letter 96-05, Turkey Point, Unit Nos. 3 and 4 (TAC Nos. M97112 and 97113)," (ADAMS Accession No. ML003727837) dated June 29, 2000

Florida Power & Light Company (FPL) notified the NRC, in References 1 and 2, that Turkey Point Units 3 and 4, respectively, completed the required actions of NRC Generic Letter (GL) 89-10. Reference 3 documented Turkey Point's response to GL 96-05 and notification to the NRC that it was committing to participate in the industry-wide Joint Owners Group (JOG) Program on MOV Periodic Verification Testing (PVT). The NRC, in Reference 4, documented its review and acceptance of the Turkey Point MOV Program that was implemented in response to GL 96-05.

The Attachment to this letter provides FPL's notification to the NRC that Turkey Point removed six Safety-Injection Accumulator Discharge Isolation Valves (MOV-3-865 A/B/C and MOV-4-865 A/B/C) from the GL 89-10 and 96-05 MOV Programs. The attachment to this letter provides the commitment change evaluation summary.

Should you have any questions regarding this submission, please contact Ms. Maribel Valdez, Fleet Licensing Manager, at 561-904-5164.

This letter contains no new regulatory commitments.

Sincerely,

Kenneth A. Mack
Director, Licensing and Regulatory Affairs
Florida Power & Light Company

cc: USNRC Regional Administrator, Region II
Project Manager, USNRC, Turkey Point Nuclear Plant
Resident Inspector, USNRC, Turkey Point Nuclear Plant
Mr. Clark Eldredge, Florida Department of Health

Attachment: Turkey Point MOV Program Commitment Change Evaluation Summary

ATTACHMENT

TURKEY POINT MOV PROGRAM COMMITMENT CHANGE EVALUATION SUMMARY

(2 pages follow)

TURKEY POINT MOV PROGRAM COMMITMENT CHANGE EVALUATION SUMMARY

COMMITMENT DESCRIPTION

The scope of the Turkey Point (PTN) Generic Letter (GL) Motor-Operated Valve (MOV) Program includes all safety-related position changeable MOVs consistent with NRC GL 89-10 and select "balance of plant" MOVs that have been determined to be important to safety. The scope of MOVs for GL 89-10 is the same as GL 96-05. Turkey Point committed to follow the Joint Owners Group (JOG) periodic verification plan where Periodic Verification Tests (PVTs) are scheduled at a maximum 10-year frequency.

COMMITMENT REVISION

Turkey Point removed six Safety Injection (SI) Accumulator Discharge Isolation Valves, MOV-3-865 A/B/C and MOV-4-865 A/B/C, from the PTN GL 89-10/96-05 MOV Program.

BACKGROUND

MOVs within the scope of the GL 96-05 are tested at assigned intervals to periodically verify design-basis capability. This ensures that age related degradation has not caused a significant decrease in motor-operator capability or a significant increase in operating requirements that could jeopardize the MOVs' ability to perform their safety functions. The maximum interval for Low Risk/High Margin PVTs is 10 years with a documented fleet position on extending MOV PVT intervals in ER-AA-116, "Motor Operated Valve Program."

Safety Injection Accumulator Discharge Isolation Valves are locked open with the breakers racked out when Reactor Coolant System (RCS) pressure exceeds 1000 psig per plant Technical Specifications (TS). Those instances when the MOVs are repositioned closed, in off-normal or emergency procedures, do not represent a safety function. The MOVs are located inside containment and are not Environmentally Qualified (EQ). The MOVs are not modeled in the most recent PTN MOV Risk Ranking (PTN-BFJR-93-013) and are therefore considered low risk.

SAFETY CLASSIFICATION

MOV-3/4-865A/B/C perform the following functions:

Safety-Related Functions

1. MOV-3-865 A/B/C and MOV-4-865 A/B/C, SI Accumulator Discharge Isolation Valves, shall remain open during power operation to provide a SI flow path from the associated SI accumulator to the RCS cold legs.

2. MOV-3-865 A/B/C and MOV-4-865 A/B/C shall remain closed during low temperature, low pressure operation to prevent over pressurization of the RCS.

3. MOV-3-865 A/B/C and MOV-4-865 A/B/C shall passively maintain the SI system pressure boundary integrity.

Quality Related Functions

1. MOV-3-865 A/B/C and MOV-4-865 A/B/C shall close remote/manually to isolate the SI accumulators high pressure fluid from the RCS upon approach to cold shutdown and during SI accumulator refill below 380 F. This isolation function prevents inadvertent injection during plant shutdown.
2. MOV-3-865 A/B/C and MOV-4-865 A/B/C shall close remote/manually to isolate the high-pressure RCS from the SI accumulators upon failure of the check valves to prevent leak-by and potential over pressurization of the accumulators.
3. MOV-3-865 A/B/C and MOV-4-865 A/B/C shall close remote/manually to isolate the low-pressure SI accumulators from the high-pressure SI pump discharge pressure following a Loss of Coolant Accident (LOCA).

EVALUATION

Results of previous PVTs have demonstrated high performance margins for MOV-3-865 A/B/C and MOV-4-865 A/B/C. Positive margin in this context means that the MOVs' predicted performance is better than that needed to function properly. The MOVs are considered to be low risk in the most recent PTN MOV Risk Ranking (PTN-BFJR-93-013). The EPRI Performance Prediction Methodology (PPM) is used to determine required thrust and the maximum differential pressure that the MOVs are expected to overcome is 0 psi. According to EPRI PPM, the MOVs are classified as JOG Class A and not subject to age related degradation that would affect required thrust.

Since the last PVT in 2014, valve stem lubrication/grease inspection and motor-operator inspection Preventive Maintenance (PM) tasks have been performed. These time-based equipment reliability PMs are intended to minimize potential MOV degradation over time. There have not been any Action Requests (ARs) or Work Requests (WRs) generated for MOV performance issues since 2014.

The MOV PVT has no effect on MOV performance or the MOVs' ability to perform design functions. The PVT data is used to quantitatively verify design-basis capability and to identify adverse performance trends. Performance data since 2011 demonstrates that stroke times have remained consistent.

The PVTs are not used to satisfy Inservice Testing (IST) or ASME Section XI requirements. Likewise, the MOV PVT is not used to satisfy TS Surveillance Requirements (SRs).

CONCLUSION

The MOVs are locked open with the breakers racked out when the RCS is at operating pressure. They are considered low risk in the PTN MOV Risk Ranking. The valves have high positive margin to perform their quality-related functions. They exhibit consistent and repeatable stroke time tests with no indication of age degradation. Since their safety-related functions are passive functions that do not require the MOVs to change position, MOV-3-865 A/B/C and MOV-4-865 A/B/C, SI Accumulator Discharge Isolation Valves, are removed from the PTN GL 89-10/96-05 MOV Program.