



JAN 19 2000

L-2000-010  
10 CFR 50.55a

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

Re: Turkey Point Unit 3  
Docket No. 50-250  
Risk-Informed Inservice Inspection Program

In accordance with 10 CFR 50.55a(a)(3), Florida Power and Light Company (FPL) requests to revise the Turkey Point Unit 3 ISI Program for Class 1 piping only, through the use of the attached Risk-Informed Inservice Inspection Program (RI-ISI) as an alternative to the current requirements of the ASME Boiler and Pressure Vessel Code Section XI, 1989 Edition, as required by 10CFR50.55a.

The proposed revisions to the current ISI Program for Class 1 piping only are based on the risk-informed process described in Westinghouse Owners Group (WOG) WCAP-14572, Revision 1-NP-A, "Westinghouse Owners Group Application of Risk-Informed Methods to Piping Inservice Inspection Topical Report," and WCAP-14572, Revision 1-NP-A, Supplement 1, "Westinghouse Structural Reliability and Risk Assessment (SRRA) Model for Piping Risk-Informed Inservice Inspection."

The attached Risk-Informed Inservice Inspection Program supports the conclusion that the proposed alternative provides an acceptable level of quality and safety as required by 10 CFR 50.55a(a)(3)(i). This program also meets the intent and principles of Regulatory Guides 1.174 and 1.178. This program submittal has been reviewed by the Plant Nuclear Safety Committee.

FPL requests NRC approval of this WOG Risk-Informed Inservice Inspection Pilot Program within 6 months to support timely implementation of the Program. It should also be noted that FPL considers implementation of this RI-ISI Pilot Program to be a Cost Beneficial Licensing Action (CBLA).

Should there be any questions concerning this submittal, please contact us.

Very truly yours,

A handwritten signature in black ink, appearing to read 'R. J. Hovey', written over a horizontal line.

R. J. Hovey  
Vice President  
Turkey Point Plant

GSS

Attachment

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