

CATEGORY 1

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SUBJECT: Requests approval of encl revised Relief Request 6, in response to 990322 telcon with NRC & 10CRD55.55a(a) (3). Request states that visual VT-3 exams will be conducted IAW IWA-2213 & repairs will be IAW util ASME Section IX program.

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FPL

Florida Power & Light Company, 6351 S. Ocean Drive, Jensen Beach, FL 34957

April 8, 1999

L-99-84
10 CFR 50.4
10 CFR 50.55a

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

RE: St. Lucie Unit 1
Docket No. 50-335
In-Service-Inspection Plan
Third Ten-Year Interval
Revised Relief Request 6

In response to a conference call between Florida Power and Light Company (FPL) and the NRC on March 22, 1999, and pursuant to 10 CFR 50.55a (a)(3), FPL requests approval of revised Relief Request 6. Relief Request 6 is supplemented to specifically state that the visual VT-3 examinations will be conducted in accordance with IWA-2213 and that repair or replacements will be in accordance with the plant ASME Section XI Program. FPL has determined pursuant to 10 CFR 50.55a (a)(3) that the proposed alternatives would provide an acceptable level of quality and safety, and that compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. FPL letter L-98-14 originally submitted Relief Request 6 on February 2, 1998, as part of the Third Ten-Year Interval In-Service-Inspection Plan.

Approval of revised Relief Request 6 is requested by June 30, 1999, to prevent impacting the St. Lucie Unit 1 Fall 1999 refueling outage (SL1-16). Please contact us if there are any questions about this submittal.

Very truly yours,

J. A. Stall
Vice President
St. Lucie Plant

JAS/GRM

Attachment

cc: Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, St. Lucie Plant

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St. Lucie Unit 1
THIRD INSPECTION INTERVAL
RELIEF REQUEST NUMBER 6

Revision 1, 3/29/99

A. COMPONENT IDENTIFICATION:

ASME Class 1, 2, and 3 Snubbers

B. EXAMINATION REQUIREMENT:

ASME Section XI, 1989 Edition with no Addenda, paragraph IWF-5300 requires that:

- (a) Inservice examinations shall be performed in accordance with the first Addenda to ASME/ANSI OM-1987, Part 4 (published in 1988), using the VT-3 visual examination method described in IWA-2213.
- (b) Inservice tests shall be performed in accordance with the first Addenda to ASME/ANSI OM-1987, Part 4 (published in 1988).

C. RELIEF REQUESTED:

Pursuant to 10 CFR 50.55a(a)(3)(i), FPL requests an alternative to the requirements of OM-4 for the examination of snubbers as specified in the 1989 Edition of ASME Section XI.

D. BASIS FOR RELIEF:

The first addenda to ASME/ANSI OM-1987 contains a visual examination schedule which was recommended for removal from Plant Technical Specifications by Generic Letter 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions", dated December 11, 1990. This generic letter was issued to reduce the burden placed upon utilities by the then overly restrictive visual examination schedule. Technical Specification Amendment # 110, incorporated the requirements of Generic Letter 90-09 and removed the restrictive visual examination requirement from the St. Lucie Plant Technical Specifications. The visual examination table in OM Part 4 would return the plant to what was present in the plant Technical Specifications prior to the issuance and incorporation of Generic Letter 90-09.

The initial sample for functional testing is the same in OM-4 as the Technical Specifications (10%). The sample expansion required by OM-4 would result in less snubbers being tested but would significantly increase the engineering man-hours required to identify the sample expansion. Plant Technical Specifications require a 10% sample expansion (based on design type population) without the extensive engineering man-hours required by OM-4. St. Lucie currently performs functional testing during refueling outages, including any sample expansion requirements. OM-4 imposes requirements that could extend the off-load window which would extend the refueling outage with no increase in the level of quality or safety.

A single functional test failure, which is identified in OM-4 as generic or application induced failure, would require the entire group of snubbers to be replaced or modified. Once all the units were replaced, OM-4 requires a shutdown after 2 months and before 12 months to perform inspection/testing. This would result in hardship for material replacement, extended outages, forced shutdowns, radiation exposure, and extensive costs and man-hours without an increase in the level of quality or safety.

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E. ALTERNATIVE EXAMINATIONS:

Florida Power & Light St. Lucie Plant will perform functional testing in accordance with plant Technical Specifications. Base sample shall be 10 %, 10% sample expansion based on design type population, and the following will be considered:

- 1) Snubbers immediately adjacent to those found unacceptable.
- 2) Snubbers from the same system having similar operating conditions, such as temperature, humidity, vibration, and radiation.

Visual VT-3 examinations will be conducted in accordance with IWA-2213 and plant Technical Specifications 4.7.10 "Surveillance Requirements [for snubbers]". In addition, snubbers with conditions that could impact their function will be evaluated for continued operation.

The St. Lucie Plant Section XI Repair and Replacement Program shall govern corrective actions requiring repairs or replacements.

F. IMPLEMENTATION SCHEDULE:

FPL will implement this alternative during the St. Lucie 1 third 10-year inservice inspection interval.

G. ATTACHMENTS TO THE RELIEF:

Technical Specification requirements 3/4.7.10

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St. Lucie 1 Technical Specification for Snubbers

PLANT SYSTEMS

3/4.7.10 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.10 All safety related snubbers shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3 and 4. (MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES).

ACTION:

With one or more safety related snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status or declare the supported system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

4.7.10 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program.

a. Inspection Types

As used in this specification, "type of snubber" shall mean snubbers of the same design and manufacturer, irrespective of capacity.

b. Visual Inspections

Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these categories (inaccessible or accessible) may be inspected independently according to the schedule determined by Table 4.7-3. The visual inspection interval for each category of snubber shall be determined based upon the criteria provided in Table 4.7-3 and the first inspection interval determined using this criteria shall be based upon the previous inspection interval as established by the requirements in effect before Amendment.

c. Visual Inspection Acceptance Criteria

Visual inspections shall verify that (1) the snubber has no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are functional, and (3) fasteners for the attachment of the snubber to the

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component and to the snubber anchorage are functional. Snubbers which appear inoperable as a result of visual inspections shall be classified as unacceptable and may be reclassified acceptable for the purpose of establishing the next visual inspection interval, provided that (i) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers irrespective of type that may be generically susceptible; and (ii) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per specifications 4.7.10.e and 4.7.10.f, as applicable. All snubbers found connected to an inoperable common hydraulic fluid reservoir shall be counted as unacceptable for determining the next inspection interval. A review and evaluation shall be performed and documented to justify continued operation with an unacceptable snubber. If continued operation cannot be justified, the snubber shall be declared inoperable and the ACTION requirements shall be met.

**TABLE 4.7-3
SNUBBER VISUAL INSPECTION INTERVAL**

Population or Category (Notes 1 and 2)	NUMBER OF UNACCEPTABLE SNUBBERS		
	Column A Extend Interval (Notes 3 and 6)	Column B Repeat Interval (Notes 4 and 6)	Column C Reduce Interval (Notes 5 and 6)
1	0	0	1
80	0	0	2
100	0	1	4
150	0	3	8
200	2	5	13
300	5	12	25
400	8	18	36
500	12	24	48
750	20	40	78
1000 or greater	29	56	109

Note 1: The next visual inspection interval for a snubber population or category size shall be determined based upon the previous inspection interval and the number of unacceptable snubbers found during that interval. Snubbers may be categorized, based upon their

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accessibility during power operation, as accessible or inaccessible. These categories may be examined separately or jointly. However, the licensee must make and document that decision before any inspection and shall use that decision as the basis upon which to determine the next inspection interval for that category.

- Note 2: Interpolation between population or category sizes and the number of unacceptable snubbers is permissible. Use next lower integer for the value of the limit for Columns A, B, or C if that integer includes a fractional value of unacceptable snubbers as determined by interpolation.
- Note 3: If the number of unacceptable snubbers is equal to or less than the number in Column A, the next inspection interval may be twice the previous interval, but not greater than 48 months.
- Note 4: If the number of unacceptable snubbers is equal to or less than the number in Column B but greater than the number in Column A, the next inspection interval shall be the same as the previous interval.
- Note 5: If the number of unacceptable snubbers is equal to or greater than the number in Column C, the next inspection interval shall be two-thirds of the previous interval. However, if the number of unacceptable snubbers is less than the number in Column C but greater than the number in Column B, the next interval shall be reduced proportionally by interpolation, that is, the previous interval shall be reduced by a factor that is one-third of the ratio of the difference between the number of unacceptable snubbers found during the previous interval and the number of Column B to the difference in the numbers in Columns B and C.
- Note 6: The provisions of Specification 4.0.2 are applicable for all inspection intervals up to and including 48 months.

d. Functional Tests

At least once per 18 months during shutdown, a representative sample (10% of the safety related snubbers) shall be functionally tested either in place or in a bench test. For each snubber that does not meet the functional test acceptance criteria of Specification 4.7.10.e or 4.7.10.f, an additional 10% of that type of snubber shall be functionally tested. Functional test shall continue until no additional snubbers are found inoperable or all safety related snubbers have been tested.

The representative sample selected for functional testing shall include the various configurations, operating environments, and the range of size and capacity of snubbers.

Snubbers identified as "Especially Difficult to Remove" or in "High Exposure Zones During Shutdown" shall also be included in the representative sample.* Safety related hydraulic snubber listings and safety related mechanical snubber listings may be used jointly or separately as the basis for the sampling plan.

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In addition to the regular sample, snubbers which failed the previous functional test shall be retested during the next test period. If a spare snubber has been installed (if it is repaired and installed in another position) then the spare snubber shall be retested. Test results of these snubbers shall not result in additional functional testing due to failure.

- * Permanent or other exemptions from the functional testing for individual snubbers in these categories may be granted by the Commission only if justifiable basis for exemption is presented and/or snubber life destructive testing was performed to qualify snubber operability for all design conditions at either the completion of their fabrication or at a subsequent date.

If any snubber selected for functional testing either fails to lockup or fails to move, i.e., frozen in place, the cause will be evaluated, and if caused by manufacturer or design deficiency, all snubbers of the same design subject to the same defect shall be functionally tested. This testing requirement shall be independent of the requirements stated above for snubbers not meeting the functional test acceptance criteria.

e. Hydraulic Snubbers Functional Test Acceptance Criteria

The hydraulic snubber functional test shall verify that:

1. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.
2. Snubber bleed, or release rate, where required, is within the specified range in compression or tension.

f. Mechanical Snubbers Functional Test Acceptance Criteria

The mechanical snubber functional test shall verify that:

1. The force that initiates free movement of the snubber rod in either tension or compression is less than the specified maximum drag force.
2. Activation (restraining action) is achieved in both tension and compression.

g. Snubber Service Life Monitoring

A record of the service life of each snubber, the date at which the designated service life commences and the installation and maintenance records on which the designed service life is based shall be maintained as required by Specification 6.10.2.1.

Concurrent with the first inservice visual inspection and at least once per 18 months thereafter, the installation and maintenance records for each safety related snubber shall be reviewed to verify that the indicated service life has not been exceeded or will not be exceeded by more than 10% prior to the next scheduled snubber service life review. If the indicated service life will be



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exceeded by more than 10% prior to the next scheduled snubber service life review, the snubber service life shall be reevaluated or the snubber shall be replaced or reconditioned so as to extend its service life beyond the date of the next scheduled service life review. The results of the reevaluation may be used to justify a change to the service life of the snubber. This reevaluation, replacement, or reconditioning shall be indicated in the records.