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 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C      05000250  
       50-251 Turkey Point Plant, Unit 4, Florida Power and Light C      05000251  
 AUTH. NAME      AUTHOR AFFILIATION  
 WOODY, C. O.      Florida Power & Light Co.  
 RECIP. NAME      RECIPIENT AFFILIATION  
 RUBENSTEIN, L. S.      PWR Project Directorate 2

SUBJECT: Requests NRC approval to defer sealing fire barrier penetrations where cable reroute work would extend beyond end of Unit 4 refueling outage & use 20 minute roving fire watch in lieu of continuous fire watch.

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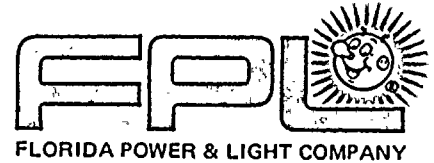
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April 4, 1986

L-86-153

Office of Nuclear Reactor Regulation  
 Attention: Mr. Lester S. Rubenstein, Director  
 PWR Project Directorate #2  
 Division of PWR Licensing - A  
 U. S. Nuclear Regulatory Commission  
 Washington, D. C. 20555

Dear Mr. Rubenstein:

Re: Turkey Point Units 3 and 4  
 Docket Nos. 50-250 and 50-251  
Fire Protection

By letter dated November 16, 1984 (L-84-331) Florida Power & Light Company (FPL) requested schedular relief from the requirements of 10 CFR 50.48C(2), C(3), and C(4) relating to implementing the fire protection requirements of Appendix R to 10 CFR 50.48. A meeting was held December 10, 1984 with the NRC staff to discuss that schedular exemption request. At that meeting FPL proposed to initiate, as compensatory measures until the Appendix R related work can be completed, a continuous (24 hour, 7 day per week) fire watch in the cable spreading room, the auxiliary building north-south breezeway area, and the control room, as well as a 20 minute roving fire watch to cover the remaining areas for which schedular relief had been requested. These commitments were documented in a letter dated December 17, 1984 (L-84-375). On January 15, 1985 the NRC approved FPL's schedular exemption request and issued a safety evaluation report for the exemption.

FPL has reevaluated the requirement for the continuous fire watch in the cable spreading room, the auxiliary building north-south breezeway, and the control room, and requests NRC approval to use a 20 minute roving fire watch in lieu of the continuous fire watch to cover these areas. This change is justified based on the following: the control room is continuously manned, the other areas are occupied a majority of the time due to ongoing work, detection is available in the three areas, a suppression (deluge) system is operational in the auxiliary building north-south breezeway, a halon system will be operational in the cable spreading room before Unit 4 (currently in a refueling outage) returns to power in May, 1986, and there is reasonable assurance that a 20 minute roving fire watch would detect a fire in these areas in its incipient stage before significant flame propagation or temperature rise permitting timely control room notification and fire brigade response. Fire watches are trained in the proper use of portable extinguishers and are capable of controlling or suppressing a fire to minimize damage pending arrival of the fire brigade. Approval of this request would permit a considerable cost savings in manpower.

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1. The first part of the document is a list of names and addresses of the members of the committee. The names are listed in alphabetical order, and the addresses are given in full. The list is as follows:

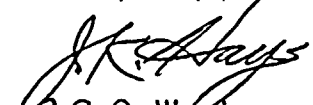
Name	Address
Mr. A. B. C.	123 Main St., New York, N. Y.
Mr. D. E. F.	456 Broadway, New York, N. Y.
Mr. G. H. I.	789 Fifth Ave., New York, N. Y.
Mr. J. K. L.	1010 Third Ave., New York, N. Y.
Mr. M. N. O.	1111 Second Ave., New York, N. Y.
Mr. P. Q. R.	1212 First Ave., New York, N. Y.
Mr. S. T. U.	1313 West 125th St., New York, N. Y.
Mr. V. W. X.	1414 East 125th St., New York, N. Y.
Mr. Y. Z. A.	1515 North 125th St., New York, N. Y.
Mr. B. C. D.	1616 South 125th St., New York, N. Y.
Mr. E. F. G.	1717 Central Ave., New York, N. Y.
Mr. H. I. J.	1818 Union Ave., New York, N. Y.
Mr. K. L. M.	1919 Madison Ave., New York, N. Y.
Mr. N. O. P.	2020 Park Ave., New York, N. Y.
Mr. Q. R. S.	2121 Lexington Ave., New York, N. Y.
Mr. T. U. V.	2222 Madison Ave., New York, N. Y.
Mr. W. X. Y.	2323 Park Ave., New York, N. Y.
Mr. Z. A. B.	2424 Lexington Ave., New York, N. Y.
Mr. C. D. E.	2525 Madison Ave., New York, N. Y.
Mr. F. G. H.	2626 Park Ave., New York, N. Y.
Mr. I. J. K.	2727 Lexington Ave., New York, N. Y.
Mr. L. M. N.	2828 Madison Ave., New York, N. Y.
Mr. O. P. Q.	2929 Park Ave., New York, N. Y.
Mr. R. S. T.	3030 Lexington Ave., New York, N. Y.
Mr. U. V. W.	3131 Madison Ave., New York, N. Y.
Mr. X. Y. Z.	3232 Park Ave., New York, N. Y.
Mr. A. B. C.	3333 Lexington Ave., New York, N. Y.
Mr. D. E. F.	3434 Madison Ave., New York, N. Y.
Mr. G. H. I.	3535 Park Ave., New York, N. Y.
Mr. J. K. L.	3636 Lexington Ave., New York, N. Y.
Mr. M. N. O.	3737 Madison Ave., New York, N. Y.
Mr. P. Q. R.	3838 Park Ave., New York, N. Y.
Mr. S. T. U.	3939 Lexington Ave., New York, N. Y.
Mr. V. W. X.	4040 Madison Ave., New York, N. Y.
Mr. Y. Z. A.	4141 Park Ave., New York, N. Y.
Mr. B. C. D.	4242 Lexington Ave., New York, N. Y.
Mr. E. F. G.	4343 Madison Ave., New York, N. Y.
Mr. H. I. J.	4444 Park Ave., New York, N. Y.
Mr. K. L. M.	4545 Lexington Ave., New York, N. Y.
Mr. N. O. P.	4646 Madison Ave., New York, N. Y.
Mr. Q. R. S.	4747 Park Ave., New York, N. Y.
Mr. T. U. V.	4848 Lexington Ave., New York, N. Y.
Mr. W. X. Y.	4949 Madison Ave., New York, N. Y.
Mr. Z. A. B.	5050 Park Ave., New York, N. Y.

Mr. Lester S. Rubenstein, Director  
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In addition, FPL in a letter dated October 11, 1985 (L-85-385) requested certain additional schedular exemptions to 10 CFR 50.48, among them cable reroute work to be completed before the end of June, 1986. FPL requests NRC approval to defer sealing those penetrations (approximately 110 out of approximately 1200 penetration seals) where cable reroute work would extend beyond the end of the Unit 4 refueling outage. Technical Specification 3.14.5, Fire Barrier Penetrations, is applicable to those penetrations, and FPL would take the action specified in that specification.

If you have any questions regarding the above requests, please call us.

Very truly yours,

  
for C. O. Woody  
Group Vice President  
Nuclear Energy

COW/TCG/gp

cc: Harold F. Reis, Esquire  
Dr. J. Nelson Grace, NRC Region II

