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 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250
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 WOODY, C. D. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Special rept: on 860930 & 1001, schedular exemptions for safe shutdown mods re compensatory measures to be taken when fire protection sys impaired expired, w/o notification to NRC. Caused by large number of mods being performed.

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JULY 7 1987

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Attn: Document Control Desk
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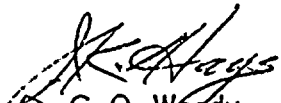
Gentlemen:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Special Report - Breached Fire Barriers and
Other Fire Protection System Impairments

In accordance with Technical Specification 6.9.3 the attached Special Report is provided for your information:

Should there be any questions on this information, please contact us.

Very truly yours,

for 
C. O. Woody
Group Vice President
Nuclear Energy

COW/SDF/gp

Attachment

cc: Dr. J. Nelson Grace, Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant

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SPECIAL REPORT

JULY 6, 1987

FIRE PROTECTION SYSTEM IMPAIRMENTS REQUIRING NRC NOTIFICATION

Purpose:

Technical Specification (TS) 3.14.5.b requires the submission of a report to the NRC if a non-functional fire barrier penetration is not returned to functional status within 7 days. TS 3.14 states that certain other conditions also require NRC notification. In accordance with the above requirements, this special report is being generated in order to notify the NRC. This report will be updated on a 30 day basis.

Event:

The plant has been and is continuing to implement numerous modifications in accordance with Appendix R Alternate Shutdown requirements and other unrelated requirements. The scheduler exemptions for the Safe Shutdown modifications, which outlined the alternative compensatory measures to be taken when a barrier is breached, expired on September 30, 1986, and on October 1, 1986. Upon the expiration of the exemptions, the compensatory measures as described in Attachment 1 of our letter L-85-386 (dated October 11, 1985), are continuing to be in place until the Safe Shutdown modifications are complete. Impairments incurred during Alternate Shutdown modifications are governed by the Technical Specifications or the exemptions, as applicable. Other impairments are governed strictly by the Technical Specifications.

Cause and Corrective Actions:

The major cause of the impairments is the large number of modifications being performed. Due to the large volume of work being performed, the plant is reporting the impairments in this one report, rather than on a case-by-case basis. The impairments reported this month are either open or closed at the present time, but were open in excess of the time period permitted without requiring NRC notification (see lists on pages 3 and 4). The impairments have been broken down into 3 major categories:

- A) Impairments incurred as a result of Appendix R related modifications.
- B) Impairments incurred as a result of non-Appendix R related modifications or maintenance.
- C) Impairments incurred due to a degraded fire protection feature requiring repair.

This report also includes impairments which were:

- 1) opened prior to June, and
- 2) stayed open for longer than the time permitted by the Technical Specifications, and
- 3) are either still open or were closed prior to June.

The above impairments are included in this report as they were not reported previously (see list on page 5). Because the above list may not be complete, a review of Fire Protection System Impairments (FPI) will be performed in order to assure that previous FPI's subject to TS reporting requirements have been identified. The cause for the failure to identify and report these impairments on a timely basis will be determined and reported in next month's report.

The plant continues to implement the compensatory measures as applicable.

**FIRE PROTECTION SYSTEM IMPAIRMENTS OPENED SINCE JUNE REPORT WHICH
HAVE BEEN OPEN FOR LONGER THAN TECH SPEC LIMITS**

Imp#	Description	Open	Closed	Cause
1107	Fire Door 030-2	6/08/87		B
1112	Valve 643	6/15/87		B
1113	Fire Door 101.1	6/16/87		B
1115	Fire Barriers	6/21/87		B
1116	Fire Door 108A-1	6/23/87		B
87-0278	Struc Stl Fireproofing	6/04/87		C
87-0279	Fire Barrier 096E	6/04/87		B
87-0280	Fire Barrier 062W	6/04/87		B
87-0281	Fire Detection Systems	6/04/87		B
87-0286	Fire Barrier 097E	6/11/87		B
87-0287	Fire Barrier 097E	6/11/87		B
87-0288	Fire Barrier 094W	6/12/87		C
87-0289	Fire Barrier 096W	6/12/87		C
87-0290	Fire Barrier PAHM	6/12/87		B
87-0291	Fire Barrier PAHM	6/12/87		B
87-0292	Fire Barrier PAHM	6/12/87		B
87-0293	Fire Doors Elec Pen 019.1	6/15/87		B
87-0294	Fire Barrier PAHM	6/14/87		B

"Cause" Note

- A) Impairments incurred as a result of Appendix R related modifications.
- B) Impairments incurred as a result of non-Appendix R related modifications or maintenance.
- C) Impairments incurred due to a degraded fire protection feature requiring repair.

**FIRE PROTECTION SYSTEM IMPAIRMENTS CLOSED IN JUNE BUT WERE
OPEN FOR LONGER THAN TECH SPEC LIMITS**

Imp#	Description	Open	Closed	Cause
1038	Penetration Seal 094W M004	2/05/87	6/23/87	A
1039	Penetration Seal 096W E002	2/05/87	6/23/87	A
1041	Penetration Seal 094W M003	2/05/87	6/23/87	A
1087	A- EDG Bldg	5/09/87	6/01/87	B
1093	Fire Door 096-1	5/12/87	6/08/87	C
1095	Fire Door 106.1	5/20/87	6/01/87	C
1103	Fire Door 020-1	6/01/87	6/22/87	B
87-0153	Conduit Seal 98W-E015	3/14/87	6/05/87	B
87-0167	Conduit Seal B3J1297	3/21/87	6/18/87	B
87-0197	Fire Detection System	4/03/87	6/05/87	B
87-0243	Fire Barrier 106E	4/24/87	6/03/87	B
87-0255	Raceway Protection B.3K1692	5/19/87	6/04/87	B
87-0256	Raceway Protection B4J1	5/21/87	6/04/87	B
87-0260	Fire Barrier 110-5-E003	5/25/87	6/03/87	B
87-0261	Fire Barrier 108A-NI-E009	5/25/87	6/03/87	B
87-0262	Fire Barrier 108B5-E006	5/25/87	6/03/87	B
87-0263	Fire Barrier 103S-E006	5/25/87	6/03/87	B
87-0264	Fire Barrier 101N-E013	5/25/87	6/03/87	B
87-0265	Fire Barrier 104S-E006	5/25/87	6/03/87	B
87-0267	Fire Barrier 104F-E009	5/26/87	6/03/87	B
87-0268	Fire Barrier 022-S1-E005	5/26/87	6/03/87	B
87-0270	Raceway Protection	5/27/87	6/30/87	B
87-0271	Penetration Seal A456	5/27/87	6/16/87	B

"Cause" Note

- A) Impairments incurred as a result of Appendix R related modifications.
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- C) Impairments incurred due to a degraded fire protection feature requiring repair.

The following impairments were incurred prior to June, 1987, however they are being included in this report as they were not reported previously.

Imp#	Description	Open	Closed	Cause
87-0142	Conduit Seal S 3K1390-2	3/07/87		B
87-0154	Conduit Seal 70E-E008	3/14/87		B
87-0155	Conduit Seal 71E-E007	3/14/87		B
87-0156	Conduit Seal 106E-E015	3/14/87		B
87-0157	Conduit Seal 1084E-E003	3/14/87		B
87-0158	Conduit Seal 58E-E005	3/14/87		B
87-0159	Conduit Seal 40E-E010	3/14/87		B
87-0184	Penetration Seal 106F-E339	3/22/87		B
1053	Remove 3B ICW Motor	3/09/87	3/31/87	B
87-0195	Conduit Seal 3J1436	4/02/87		B
87-0217	Fire Barrier 45-S	4/10/87		C
87-0259	Raceway Protection TB 4835	5/26/87		B
87-0269	Raceway Protection B3J1618	5/27/87		B
1058	Alarm Pt 27	3/17/87	5/17/87	C
86-0036	Fire Barrier 045E-E006	10/01/86	5/06/87	B
87-0103	Penetration Seal 33F-M002D	2/13/87	5/08/87	B
87-0104	Penetration Seal 33F-M002B	2/13/87	5/08/87	B
87-0116	Conduit Seal 3J1419	2/25/87	5/19/87	B
87-0117	Penetration Seal 132N-E001	2/25/87	5/15/87	B
87-0127	Penetration Seal 098F-E-051	3/03/87	5/18/87	B
87-0128	Penetration Seal 061N-E001	3/03/87	5/18/87	B
87-0129	Penetration Seal 09FN-E051	3/03/87	5/18/87	B
87-0143	Manhole 306	3/09/87	5/22/87	B
87-0144	Manhole 320	3/09/87	5/22/87	B
87-0199	Penetration Seal 132E-E001	4/04/87	5/15/87	B
87-0200	Penetration Seal 098F-E053	4/04/87	5/18/87	B
87-0201	Penetration Seal 0635-E003	4/04/87	5/18/87	B
87-0202	Penetration Seal 098F-E002	4/04/87	5/18/87	B
87-0203	Penetration Seal E003	4/04/87	5/18/87	B
87-0231	Penetration Seal 63W-E001	4/16/87	6/10/87	B
87-0232	Penetration Seal 0635-E002	4/16/87	5/18/87	B
87-0236	Penetration Seal 098F-E042	4/18/87	5/18/87	B
87-0239	Conduit Seal A3J1095	4/23/87	5/13/87	B
87-0240	Conduit Seal B3J1096	4/23/87	5/13/87	B
87-0241	Fire Door 55-1	4/22/87	5/13/87	B
87-0242	Manhole 304	4/24/87	5/22/87	B
87-0244	Fire Barrier 063W E004	4/23/87	5/09/87	B
87-0248	Penetration Seal 106E-E185	4/29/87	5/13/87	B

"Cause" Note

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