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 WOODY, C. O. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Special rept re fire protection sys impairments due to large number of mods being performed. Rept includes impairments which were: opened prior to Jul, stayed open longer than time permitted or are still open or were closed prior to Jul.

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AUGUST 07 1987

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U. S. Nuclear Regulatory Commission
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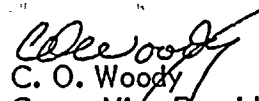
Gentlemen:

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,


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

AUGUST 7, 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. Additionally, the July Fire Protection Special Report stated that the cause for the failure to identify and report certain impairments (as listed in the July report) would be determined and reported in this month's report.

Event:

The plant has been and is continuing to implement 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 attached lists).

This report also includes impairments which were:

- 1) opened prior to July, 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 July.

The above impairments are included in this report as they were not reported previously.

Other impairments incurred in June or July are also listed. Details on these breaches will be provided in a supplemental report to be submitted by August 14, 1987.

The cause of the failure to identify and report on a timely basis the impairments listed as being reported late in the July report has been determined and is described below (see attached lists).

The impairment Control Program is managed by our Fire Protection Group (FPG) utilizing a computer data base. Slow field reporting of impairments to the FPG was identified during our triennial fire protection audit in April, 1987. A meeting was subsequently held to communicate this problem to all concerned parties. As a result of this meeting, a line item manual search was conducted and a list of impairments which were unaccounted for was developed. The field groups then compared their files and forwarded the previously unsubmitted impairments to the FPG. These impairments were then added to the data base. A line item comparison of the updated data base with all previously reported impairments was conducted by the FPG and all items which were open for longer than the specified time and did not appear on any previously submitted reports were added to July's report.

In order to improve the reliability of our impairment control program, the following actions are planned:

- 1) Replacement of the existing temporary computer program with a vendor developed program with vastly improved capability, sorting techniques, and notification memos.
- 2) Development of methods to assure prompt reporting of impairments from the field groups to the FPG.
- 3) The impairment control program will be placed in a separate procedure which will be used by all field groups.
- 4) A training brief concerning this topic will be issued upon the above procedure being issued.

The plant continues to implement the compensatory measures as applicable.

BREACHES TO FIRE BARRIERS CLOSED IN JULY,
BUT WERE OPEN FOR MORE THAN 7 DAYS

<u>Number</u>	<u>Description</u>	<u>Open Date</u>	<u>Closing Date</u>
1121	Fire Doors 021-1	07/17/87	07/28/87
86-0171	Manhole Cover and Floor Slots	11/17/86	07/08/87
87-0277	Penetration Seals 096-E002	06/04/87	07/08/87
87-0292	Penetration Seals 33F-M002	06/12/87	07/17/87
87-0294	Fire Barriers - Floor Plugs - Aux Hall	06/14/87	07/08/87
87-0298	Fire Detection Systems	06/16/87	07/09/87
87-0302	Penetration Seals 038F-M009	06/23/87	07/17/87
87-0303	Penetration Seals 003E-M004	06/23/87	07/17/87
87-0304	Penetration Seals 003E-M005	06/23/87	07/17/87
87-0305	Penetration Seals 31F-M001	06/23/87	07/09/87
87-0315	Fire Doors 22-2	07/07/87	07/24/87
1057	Water Suppression System	03/17/87	07/09/87

BREACHES TO FIRE BARRIERS OPENED IN JULY,
OPEN FOR LONGER THAN 7 DAYS, AND OPEN AS OF 08/01/87

<u>Number</u>	<u>Description</u>	<u>Open Date</u>	<u>Closing Date</u>
87-0314	Raceway Protection	07/07/87	

BREACHES TO FIRE BARRIERS OPENED PRIOR TO JULY,
OPEN FOR LONGER THAN 7 DAYS, AND OPEN AS OF 07/01/87,
BUT NOT PREVIOUSLY REPORTED

<u>Number</u>	<u>Description</u>	<u>Open Date</u>	<u>Closing Date</u>
87-0290	Penetration Seals 30F-M003	06/12/87	
87-0291	Penetration Seals 30F-M046	06/12/87	
87-0300	Penetration Seals 28E-H001	06/09/87	
87-0308	Raceway Protection B0	06/30/87	
87-0309	Penetration Seals 40F-M003	06/23/87	
87-0310	Penetration Seals 40F-M011	06/23/87	
87-0193	Struc. Steel Fire Proof	03/30/87	
87-0253	Fire Door 027-1	05/14/87	

BREACHES TO FIRE BARRIERS CLOSED PRIOR TO JULY,
BUT WERE OPEN FOR MORE THAN 7 DAYS
AND NOT PREVIOUSLY REPORTED

<u>Number</u>	<u>Description</u>	<u>Open Date</u>	<u>Closing Date</u>
86-0271	Fire Detection Systems	12/15/86	06/30/87
87-0285	Fire Barriers 098-N	06/09/87	06/18/87
87-0288	Fire Barriers 094W	06/12/87	06/23/87
87-0289	Fire Barriers 096W	06/12/87	06/23/87
87-0142	Conduit Seals S3K1390-2	03/07/87	06/30/87

OTHER BREACHES OPENED IN JUNE AND JULY

87-0299
87-0316
87-0317
87-0318
87-0320