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RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Special rept: several impairments incurred during alternate shutdown modsi, including impairments opened prior to Nov & stayed open for longer than required per Tech Specs. Compensatory measures continue.

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NOVEMBER 0 6 1987
L-87-450

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

Gentlemen:

Re: Turkey Point Unit 3
Docket No. 50-250
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,

J. K. Hays
for C. O. Woody
Group Vice President
Nuclear Energy

COW/TCG/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

NOVEMBER 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 modifications in accordance with Appendix R Alternate Shutdown requirements and other unrelated requirements. The schedular 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 number of modifications being performed. Due to the 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.

This report includes impairments not reported previously which were:

1) opened prior to November 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 November. The closed impairments have been reported at the time opened, unless noted otherwise.

The plant continues to implement the compensatory measures as applicable.

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

Imp#	Description	Open	Closed
1192	Fire Door 058-2	09/29/87	
1215	Alarm Point 26	10/08/87	
1216	Alarm Point 27	10/08/87	
1217	Sealtight (Thermolag)	10/17/87	
1221	Fire Door 41-1	10/20/87	
87-0333	Penetration Seal CRN-C-1820	09/28/87	10/07/87
87-0335	Pen. Seal 104 E2 CRN-C-1826	10/16/87	

FIRE PROTECTION SYSTEM IMPAIRMENTS CLOSED SINCE SEPTEMBER REPORT BUT WERE OPEN FOR LONGER THAN TECH SPEC LIMITS

Imp#	Description	Open	Closed
1116	Fire Door 108A-1	06/23/87	10/12/87
87-0046	Penetration Seal 40E-E009	10/01/86	09/27/87
87-0286	Fire Barrier 097E	06/11/87	10/21/87
87-0287	Fire Barrier 097E	06/11/87	10/21/87

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

Imp#	Description	Open	Closed
1180	Fire Detection System	09/18/87	
87-0320	Raceway Protection B 4G1342	07/23/87	