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 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

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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 TITLE: OR/Licensing Submittal: Fire Protection

NOTES:

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NOVEMBER 06 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,

C. O. Woody
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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1. The first part of the document discusses the importance of maintaining accurate records of all transactions and activities. It emphasizes that proper record-keeping is essential for transparency and accountability, particularly in financial matters.

2. The second part outlines the various methods and tools used to collect and analyze data. This includes the use of surveys, interviews, and statistical software to ensure that the information gathered is reliable and valid.

3. The third part focuses on the ethical considerations surrounding data collection and analysis. It highlights the need to protect individual privacy and ensure that data is used responsibly and for its intended purpose.

4. The fourth part discusses the challenges faced in the process of data collection and analysis. These challenges include issues related to data quality, sample representativeness, and the potential for bias in the results.

5. The fifth part provides a summary of the findings and conclusions drawn from the study. It reiterates the importance of rigorous data collection and analysis practices and offers recommendations for future research.

6. The final part of the document includes a list of references and a list of figures and tables. The references cite the various sources of information used in the study, while the figures and tables provide visual representations of the data collected.

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 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 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	