

# REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8305170546 DOC DATE: 83/05/12 NOTARIZED: NO DOCKET #:  
 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light Co 05000250  
 50-251, Turkey Point Plant, Unit 4, Florida Power and Light Co 05000251.  
 AUTH. NAME: AUTHOR AFFILIATION:  
 UHRIG, R. E., Florida Power & Light Co.,  
 RECIPIENT NAME: RECIPIENT AFFILIATION:  
 EISENHUT, D. G., Division of Licensing.

SUBJECT: Requests exemption from App R: Section III.0 requiring  
 reactor coolant pump tube oil collection sys to be capable  
 of containing entire tube oil sys inventory. Existing sys  
 adequate.

DISTRIBUTION CODE: A006S COPIES RECEIVED: LTR. 1 ENCL 0 SIZE: 12  
 TITLE: OR: Submittals Fire Protection

## NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTR ENCL
	NRR ORB1, BCI 01,	3, 3		
INTERNAL:	ELD/HDS4	1, 0	IEI FILE	06 1, 1
	IE/WHITNEY, LI	1, 1	NRR: FLORAVANT07	2, 2
	NRR: NAMBACH	1, 0	NRR/DEV/CEB	09 2, 2
	NRR/DL DIR	1, 1	<u>REGI FILE</u>	04 1, 1
	RGN2.	1, 1		
EXTERNAL:	ACRS 11,	3, 3	LPOR:	03 1, 1
	NRCI POR: 02,	1, 1	NSICI	05 1, 1
	NTIS	1, 1		

1. The first part of the report is a general statement of the purpose of the study and the objectives to be achieved.

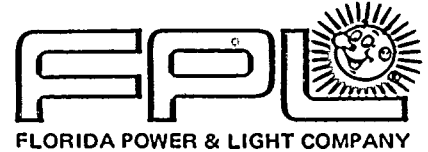
2. The second part of the report is a description of the methods used in the study and the results obtained.

3. The third part of the report is a discussion of the results and a conclusion as to the value of the study.

4. The fourth part of the report is a list of references and a list of appendices.

5. The fifth part of the report is a list of figures and tables.

TABLE I		TABLE II		TABLE III	
Year	Value	Year	Value	Year	Value
1950	100	1951	110	1952	120
1953	130	1954	140	1955	150
1956	160	1957	170	1958	180
1959	190	1960	200	1961	210
1962	220	1963	230	1964	240
1965	250	1966	260	1967	270
1968	280	1969	290	1970	300
1971	310	1972	320	1973	330
1974	340	1975	350	1976	360
1977	370	1978	380	1979	390
1980	400	1981	410	1982	420
1983	430	1984	440	1985	450
1986	460	1987	470	1988	480
1989	490	1990	500	1991	510
1992	520	1993	530	1994	540
1995	550	1996	560	1997	570
1998	580	1999	590	2000	600



May 12, 1983  
L-83-295

Office of Nuclear Reactor Regulations  
Attention: Mr. Darrell G. Eisenhut, Director  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Eisenhut:

Re: TURKEY POINT UNITS 3 & 4  
DOCKET NOS. 50-250, 50-251  
FIRE PROTECTION  
10 CFR 50 APP. R  
III.0 - OIL COLLECTION SYSTEM

Discussions with the NRC staff have recently indicated that there may be some concern regarding compliance of the Turkey Point Units 3 and 4 Reactor Coolant Pump Lubricating Oil Collection System with the requirements of 10 CFR 50 Appendix R Section III.0 with specific regard to system capacity.

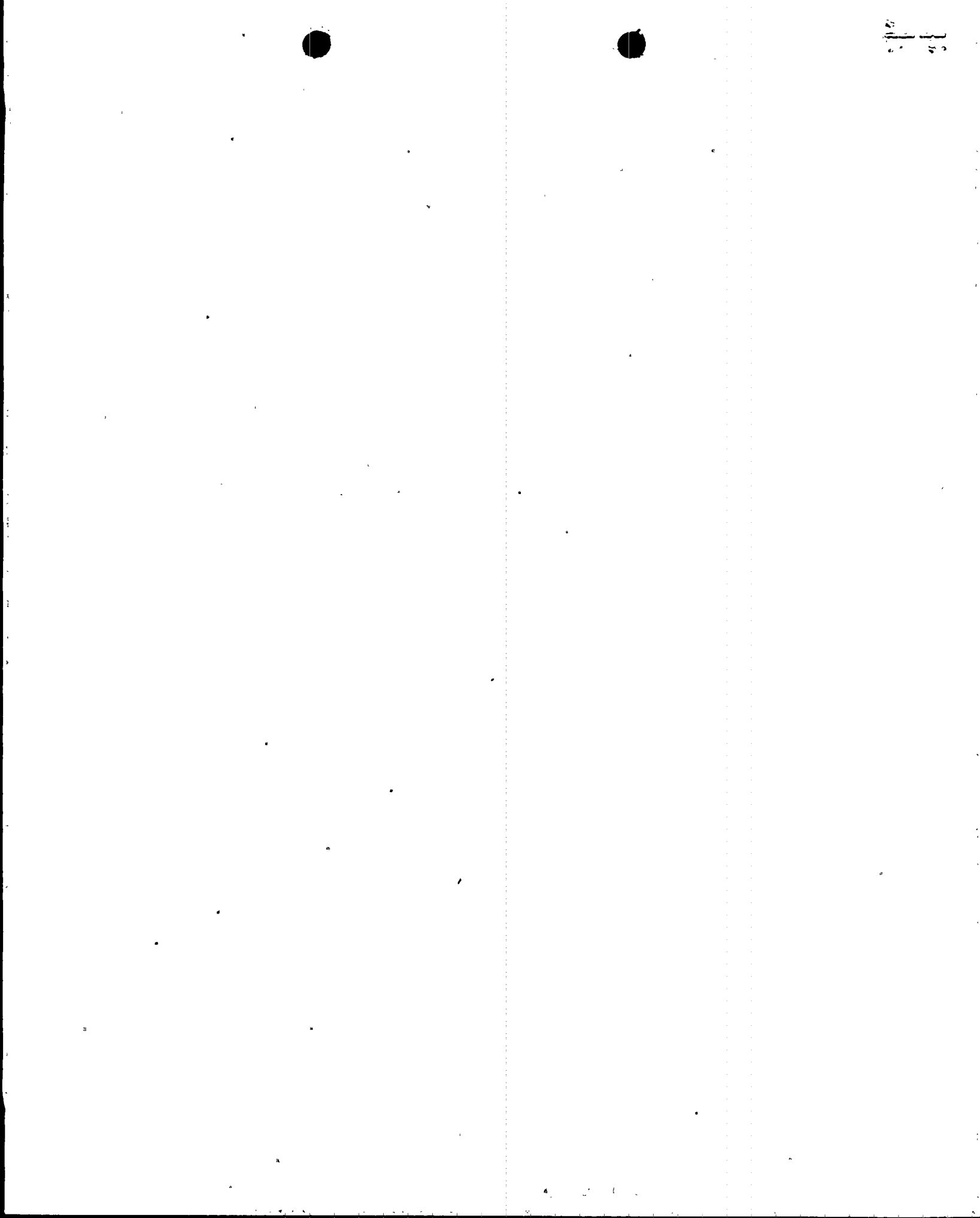
The RCP Lube Oil Collection System was designed and installed as proposed in our letters L-80-140 dated May 7, 1980 and L-80-336 dated October 7, 1980 and approved in NRC letter dated December 8, 1980. The system capacity, as designed, was based on retaining the entire lube oil system inventory of one pump and an additional amount of miscellaneous leakage from all other pumps. We believe this to be a reasonable design assumption based on the low potential for simultaneous failure of independent lube oil systems.

Recent discussions held with NRC staff have indicated that this interpretation may be inconsistent with current thinking and that an exemption request should be considered for this design. We therefore, submit in accordance with 10 CFR 50.12, the following request for exemption and supporting justification:

An exemption is requested for Turkey Point Units 3 and 4 from that portion, of 10 CFR 50, Appendix R, Section III.0, which requires the reactor coolant pump lube oil collection system to be capable of containing the entire lube oil system inventory.

A006

8305170546 830512  
PDR ADDCK 05000250  
F PDR



The installed lube oil collection system is capable of containing the entire inventory of one reactor coolant pump lube oil system (200 gallons) with sufficient excess capacity to contain any potential miscellaneous leakage from the remaining two pumps (65 gallons). The oil collection tank is located within the containment building, outside of the biological shield wall at the base mat elevation. The tank is situated away from sources of ignition such as hot reactor coolant system piping and is located as far as practicable away from safe shutdown equipment and cable.

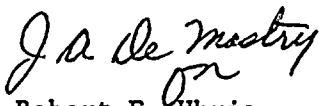
Each reactor coolant pump motor is provided with low level alarms on the upper and lower oil reservoir such that a decrease of 1" (approximately 5 gallons) of level in either reservoir will actuate an alarm in the control room. This alarm and existing operating procedures assure operator investigation at the first indication of leakage.

The lubricating oil used in the reactor coolant pump motor has a flash point of over 450°F providing additional assurance that a fire would not occur.

The lube oil collection system is seismically designed and will remain functional during a seismic event. Additionally, on the basis of historical or statistical seismic activity, Turkey Point is located in a seismically inactive area, far from any recorded damaging shocks.

In conclusion, the existing reactor coolant pump oil collection system provides adequate capability for collecting lube oil from all potential pressurized and unpressurized leakage sites in the reactor coolant pump lube oil systems. Additional modifications would not significantly augment or materially enhance the safety of the plant since they would not aid in the prevention of fire damage to redundant components essential for safe shutdown. We therefore conclude that this is an acceptable exemption to Appendix R to 10 CFR Part 50, Section III.0.

Very truly yours,



Robert E. Uhrig  
Vice President  
Advanced Systems and Technology

REU/SAV/GJK/JCF/mp

Attachment

cc: J.P. O'Reilly, Region II  
Harold F. Reis, Esquire

