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 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250  
 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251  
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 UHRIG, R. E. Florida Power & Light Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
 EISENHUT, D. G. Division of Licensing

SUBJECT: Clarifies util position on 10CFR50, App R re fire protection.  
 Fire water supply, auxiliary bldg corridor, cable spreading  
 room & fire brigade size among areas discussed.

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1. The first part of the report is a general statement of the purpose and scope of the study. It is followed by a brief review of the literature on the subject.

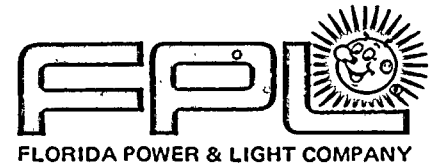
2. The second part of the report is a description of the methods used in the study. This includes a description of the subjects, the materials, and the procedures.

3. The third part of the report is a presentation of the results. This is done in the form of a table of means and standard deviations, and a series of graphs.

4. The fourth part of the report is a discussion of the results. This includes a comparison of the results with those of other studies, and a discussion of the implications of the findings.

5. The fifth part of the report is a conclusion. This is a brief statement of the main findings of the study.

Table 1		Table 2	
Subject	Mean	Subject	Mean
1	1.2	1	1.2
2	1.5	2	1.5
3	1.8	3	1.8
4	2.1	4	2.1
5	2.4	5	2.4
6	2.7	6	2.7
7	3.0	7	3.0
8	3.3	8	3.3
9	3.6	9	3.6
10	3.9	10	3.9



August 15, 1983  
L-83-447

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 NO. 50-250, 50-251  
FIRE PROTECTION  
10 CFR 50 APPENDIX R

REF: (a) NRC Letter dated 11/24/80  
(b) NRC Letter dated 12/08/80  
(c) FPL Letter No. L-81-37 dated 02/04/81  
(d) FPL Letter No. L-81-123 dated 03/19/81  
(e) NRC Letter dated 11/09/81  
(f) FPL Letter No. L-82-266 dated 07/01/82  
(g) FPL Letter No. L-82-500 dated 11/10/82  
(h) FPL Letter No. L-82-501 dated 11/12/82  
(i) FPL Letter No. L-83-115 dated 03/01/83  
(j) FPL Letter No. L-83-225 dated 04/08/83  
(k) FPL Letter No. L-83-295 dated 05/12/83  
(l) FPL Letter No. L-83-347 dated 06/06/83

The recent transmittal of the revised Turkey Point 3 & 4 fire protection report has resulted in some confusion regarding which information accurately reflects FP&L's position on fire protection issues. In an effort to resolve any potential misunderstandings, the following information concerning fire protection status and compliance is submitted.

On November 24, 1980, the NRC sent FP&L a generic letter on fire protection outlining the issues considered "open" for NRC review (Reference (a)). These open items consisted of 10 CFR 50 Appendix R items, III. G, III. J, and III. O, and the items still open from previous NRC fire protection reviews. The items open from prior review are identified by the safety evaluation numbering system as; 3.1.2 and 3.2.3. - Fire Water Supply; 3.2.4 - Auxiliary Building Corridor; 3.2.5 - Cable Spreading Room and; 6.0 Fire Brigade Size. The following discussion summarizes FP&L's position on these issues and references the applicable correspondence.

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### SER 3.1.2 and 3.2.3 - Fire Water System

In order to meet the requirement of 10 CFR 50, Appendix R, Section III. A the NRC required that FP&L provide:

- 1) a vertical standpipe for existing 500,000 gallon raw water storage tank,
- 2) a new water storage tank as a secondary source of fire water, and
- 3) an automatic starting diesel fire pump with adequate capacity to supply water to the fire loop from the secondary source.

Reference (d) accurately reflects FP&L's position on the issue. In this letter, FP&L committed to fully comply with 10 CFR 50, Appendix R, Section III. A and is in the process of implementing the requirements discussed above. An exemption was requested and approved to extend the completion time for necessary modifications to March 31, 1984 (see Reference (e)).

### SER 3.2.4. - Auxiliary Building Corridor and Ser 3.2.5 - Cable Spreading Room

Both these issues were addressed and re-evaluated in References (j) and (l). See discussion for 10 CFR 50, Appendix R, III. G below.

### SER 6.0 - Fire Brigade Size

FP&L committed in Reference (c) to implement fire brigade size and training requirements of Subsections III. H & I. Additionally, FP&L has fully implemented the requirements of Subsection III. H and III. I.

### 10 CFR 50, Appendix R, III. G - Fire Protection of Safe Shutdown Capability

Prior to the April 8, 1983 revised fire protection submittal, FP&L has been evaluating fire protection from the "design basis fire" approach instead of the "protective features" approach prescribed by the NRC. Upon recognition that the design basis approach would not adequately satisfy NRC review requirements, FP&L conducted an extensive re-evaluation of all fire areas in the plant to assess compliance with paragraph III. G (References (j) and (l)). This re-evaluation completely supercedes Reference (f). Additionally References (g) and (h), as they pertain to Subsection III. G, are considered superceded.

### 10 CFR 50, Appendix R, III. J - Emergency Lighting

Regulations require that emergency lighting units with at least an 8-hour battery power supply be provided in all areas needed for operation of safe shutdown equipment and in access and egress routes thereto. As discussed in References (j) and (l), FP&L has installed emergency lighting to meet the requirements of paragraph III. J, or requested exemption thereto.

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10 CFR 50, Appendix R, III. L - Alternative  
and Dedicated Shutdown Capability

References (j) and (l) commits FP&L to comply with the requirements of Section III. L in specific fire areas. Technical details of the proposed alternative shutdown system will be submitted October 7, 1983 in accordance with the commitment made in Reference (i).

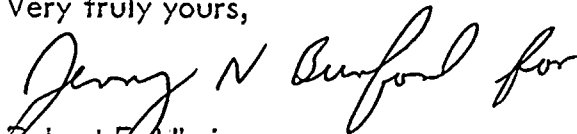
10 CFR 50, Appendix R, III.0 - Oil Collection System for Reactor  
Coolant Pump

In Reference (b), the NRC accepted the FP&L proposed oil collection system for reactor coolant pumps as meeting the requirements of paragraph III.O. Since that time, discussions between your staff and FP&L personnel indicate that our design may not be consistent with the current interpretation of III.O, and as such, FP&L has forwarded an exemption request under separate correspondence (Reference (k)).

Note: A previous request for exemption from III.O for the design of the RCP oil collection system to withstand the containment environment associated with a LOCA was deemed unnecessary by the commission (see Reference (e)).

The above discussion was intended to clarify previous correspondence regarding FP&L compliance with fire protection issues. If additional information is required, please call.

Very truly yours,



Robert E. Uhrig  
Vice President  
Advanced Systems and Technology

REU/SAV/JNB/lmg

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

