

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

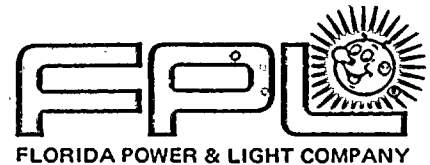
ACCESSION NBR: 8402210116 DOC. DATE: 84/02/10 NOTARIZED: NO DOCKET #
 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250
 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251
 AUTH. NAME: AUTHOR AFFILIATION
 WILLIAMS, J.W. Florida Power & Light Co.
 RECIP. NAME: RECIPIENT AFFILIATION
 EISENHUT, D.G. Division of Licensing

SUBJECT: Notices of inability to meet new scheduler requirements of
 811109 App R exemption. Extension of date for installation of
 water storage tank, diesel driven fire pump & standpipes.
 Extension to 841231 requested.

DISTRIBUTION CODE: A006S COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 2
 TITLE: OR Submittal: Fire Protection

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTR ENCL
	NRR ORB1 BC 01	3		
INTERNAL:	ELD/HDS4	1	IE FILE 06	1
	IE/WHITNEY, L	1	NRR FIORAVANT07	2
	NRR WAMBACH	1	NRR/DE/CEB 09	2
	NRR/DL DIR	1	<u>REG FILE</u> 04	1
	RG2	1		
EXTERNAL:	ACRS 11	3	LPDR 03	1
	NRC PDR 02	1	NSIC 05	1
	NTIS	1		



February 10, 1984
L-84-30

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
Appendix R, Section III.A
Exemption Request

By letter dated November 9, 1981, the NRC granted FPL an exemption from the schedular requirements of 10 CFR 50.48 (c) (2). This exemption extended the date by which Turkey Point must be in compliance with Section III.A of Appendix R until March 31, 1984. This schedular exemption request and approval was based on the time necessary for engineering, procurement, and construction associated with installation of: 1) a new 750,000 gallon Raw Water Storage Tank, 2) a new diesel driven fire pump, and 3) standpipes for water volume dedication in the existing Raw Water Storage Tank.

FPL has in good faith attempted to meet this schedule. Because of unforeseen difficulties and increases in the scope of work, FPL will not be able to meet the March 31, 1984 date. As such, FPL respectfully requests that an extension be granted to December 31, 1984 by which FPL is required to comply with Appendix R Section III A.

The major unforeseen difficulties arise from the premature failure of the protection coating installed on the existing and new Raw Water Storage Tanks (RWT). Prior to placing the new tank in service it was noted that the protective coating on the interior roof had not provided the necessary protection and rust spots developed on the roof plating. The existing RWT has not yet been drained, but an inspection was performed to assess the condition of the upper 1/3 of the tank walls and ceiling in the vicinity of the access ladder. This inspection revealed that the original protective coating had completely failed on the interior ceiling and roof framing. This failure resulted in heavy rust scale which could impact the structural capability of the framing members. Additionally, the wall coating has cracked and blistered.

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As a result of these findings, FPL feels it is necessary to make repairs to the tank's structure and protective coating prior to placing the tanks in continuous service. This preventive and corrective maintenance performed now will minimize tank downtime in the future years and is believed justified. It is expected that these repairs will require until the end of July 1984.

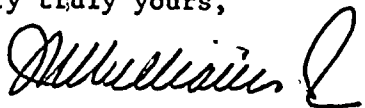
In addition to the problems encountered as a result of the failure of the tank protective coatings, an additional scope of work has been identified. During an audit conducted in accordance with the Turkey Point Technical Specifications, it was observed that there exist water connections on the fire protection main which are not for fire protection purposes. These connections, some of which were installed during initial construction of Turkey Point Units 1 & 2, were apparently overlooked during recent fire protection reviews. It is FPL's intent to remove these miscellaneous connections from the fire protection system to assure dedication of the necessary water volume for fire protection purposes. Significant modifications will be required to effect the transfer of these miscellaneous water connections to the Service Water System. In addition to the modifications needed solely to satisfy Section III.A, FPL intends to use this opportunity to improve the Fire Protection System operability (such as installation of redundant jockey pumps).

The engineering, procurement, and construction involved with the correction of these identified deficiencies will require an additional 9 months to perform. As such, it is requested that the date for compliance with Section III.A be extended to December 31, 1984.

In the interim period, prior to completion of the necessary modifications, the Turkey Point Fire Protection Program provides sufficient protection against fire hazards. In addition to the present source of fire water from one RWT, FPL will maintain the capability to provide additional fire water from the screen wash pumps as described in previous FPL correspondence. This provides the necessary redundancy of fire water supplies for the interim period of repairs, and assures the necessary protection of the public's health and safety.

If you have any further questions, please contact us.

Very truly yours,



J.W. Williams
Vice President
Nuclear Energy

JWW/GJK/mp

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

U.S. NUCLEAR REGULATORY COMMISSION		1. FEE FORM TYPE (Check one)	
REACTOR FACILITY FEE DETERMINATION		<input type="checkbox"/>	PRELIMINARY
		<input checked="" type="checkbox"/>	FINAL
		<input type="checkbox"/>	AMENDED

INSTRUCTIONS: Fill in items 1 through 14, as applicable, and send the original copy to the License Fee Management Branch.

2. DOCKET NUMBER(S) 50 - 250 \$251	3. ACCESSION NUMBER 8402210116
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4. LICENSEE Florida Power & Light Company
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5. PLANT NAME AND UNIT(S) Turkey Point 3 & 4

6. DATE OF APPLICATION 2/10/84	7. FEE REMITTED <input checked="" type="checkbox"/> YES <input checked="" type="checkbox"/> NO	8. LICENSEE FEE DETERMINATION							
		CLASS I	CLASS II	CLASS III	CLASS IV	CLASS V	CLASS VI	EXEMPT	NONE
								<input checked="" type="checkbox"/>	

9. SUBJECT Schedular Exemption Request - Appendix R, Section III.A	10. TAG NUMBER ASSIGNED (if available) 54280 & 54281
	11. APPROVAL <input checked="" type="checkbox"/> LETTER <input type="checkbox"/> ORDER AMENDMENT NUMBER(S) 3/21/84

12. NRC FEE DETERMINATION	
<input checked="" type="checkbox"/>	The above application has been reviewed in accordance with Section 170.22 of Part 170 and is properly categorized
<input type="checkbox"/>	The above application has been reviewed in accordance with Section 170.22 of Part 170 and is incorrectly classified
Fee should be class(es):	
JUSTIFICATION FOR CLASSIFICATION OR RECLASSIFICATION: Schedular Exemption granted	

This application is a Class _____ type of action and is exempt from fees because it is:	
<input type="checkbox"/>	Filed by a nonprofit educational institution.
<input type="checkbox"/>	Filed by a Government agency and is not for a power reactor.
<input type="checkbox"/>	For a Class I, II, or III amendment which results from an NRC request dated _____ for the application and the amendment is to simplify or clarify License or Technical Specifications; has only minor safety significance, and is being issued for the convenience of NRC (must meet all of the criteria)
<input checked="" type="checkbox"/>	Other (State reason therefor) Exemption request which was granted pursuant to 10 CFR 50.12

13. SIGNATURE (Branch Chief)	DATE
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14. FINAL CERTIFICATION: The preliminary fee determination has been reassessed and is hereby affirmed	DATE
SIGNATURE (Project Manager or Branch Chief) Daniel H. McDonald	CP 3/26/84 MAR 26 1984

FOR LICENSE FEE MANAGEMENT BRANCH USE ONLY (All others do not write below this line)	
The above exemption request has been reviewed and is hereby accepted as being exempt:	DATE
SIGNATURE (Chief, LFMB) W. O. Miller	3/27/84

