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ACCESSION NBR: 8411200260 DOC. DATE: 84/11/16 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
 VARGA, S.A. Operating Reactors Branch 1

SUBJECT: Requests exemptions from App R schedule requirements of
 10CFR50.48 C(2)-C(4) for six items identified in
 Attachment 3. Updated schedules for required mods encl.
 W/three oversize charts. Aperture cards available in PDR.

DISTRIBUTION CODE: A006D COPIES RECEIVED: LTR 1 ENCL 2 SIZE: 7
 TITLE: OR Submittal: Fire Protection

NOTES: 05000250
 OL: 07/19/72
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1. The first part of the document is a letter from the President of the United States to the Congress, dated January 1, 1861. It is a very important document, as it is the first official communication of the new President to the Congress. The letter is written in a very formal and dignified style, and it contains a great deal of information about the President's views on the state of the Union and the future of the country.

2. The second part of the document is a report from the Secretary of the Treasury, dated January 1, 1861. It is a very important document, as it is the first official communication of the new Secretary to the Congress. The report is written in a very formal and dignified style, and it contains a great deal of information about the state of the Treasury and the future of the country.

3. The third part of the document is a report from the Secretary of the Interior, dated January 1, 1861. It is a very important document, as it is the first official communication of the new Secretary to the Congress. The report is written in a very formal and dignified style, and it contains a great deal of information about the state of the Interior and the future of the country.

4. The fourth part of the document is a report from the Secretary of the War, dated January 1, 1861. It is a very important document, as it is the first official communication of the new Secretary to the Congress. The report is written in a very formal and dignified style, and it contains a great deal of information about the state of the War and the future of the country.

5. The fifth part of the document is a report from the Secretary of the Navy, dated January 1, 1861. It is a very important document, as it is the first official communication of the new Secretary to the Congress. The report is written in a very formal and dignified style, and it contains a great deal of information about the state of the Navy and the future of the country.

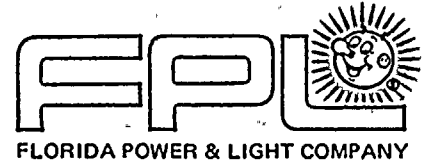
6. The sixth part of the document is a report from the Secretary of the State, dated January 1, 1861. It is a very important document, as it is the first official communication of the new Secretary to the Congress. The report is written in a very formal and dignified style, and it contains a great deal of information about the state of the State and the future of the country.

7. The seventh part of the document is a report from the Secretary of the Agriculture, dated January 1, 1861. It is a very important document, as it is the first official communication of the new Secretary to the Congress. The report is written in a very formal and dignified style, and it contains a great deal of information about the state of the Agriculture and the future of the country.

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10. The tenth part of the document is a report from the Secretary of the Public Works, dated January 1, 1861. It is a very important document, as it is the first official communication of the new Secretary to the Congress. The report is written in a very formal and dignified style, and it contains a great deal of information about the state of the Public Works and the future of the country.



November 16, 1984
L-84-331

Office of Nuclear Reactor Regulation
Attention: Mr. Steven A. Varga, Chief
Operating Reactor Branch #1
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Varga:

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250 & 50-251
Schedular Request - Fire Protection

In accordance with NRC letter dated May 31, 1984, FPL is providing updated schedules for required Appendix R modifications. The schedules were developed by a schedule evaluation team tasked by FPL management with providing schedule recommendations for all work currently known for Turkey Point. The work items considered by the team encompassed all NRC commitments such as TMI, Appendix R and Performance Enhancement Program (PEP) as well as plant enhancement projects. The summary schedule provided in attachment 1 reflects the team's recommendations for all work at Turkey Point. Attachment 2, represents a summary schedule for all Appendix R related items.

Certain Appendix R related items can not be completed by the presently approved scheduled completion dates. Attachment 3 discusses those six items and provides justification for schedule relief.

FPL is hereby requesting exemptions from the applicable schedule requirements of 10 CFR 50.48 C (2), C (3) and C (4) pursuant to 10 CFR 50.12 for the six items identified.

In order to finalize our completion plans for all Turkey Point work, we respectfully request your immediate review and response to these exemption requests. FPL is prepared to meet with you, if necessary, to expedite your review in the event you may have any questions concerning this matter.

Very truly yours,

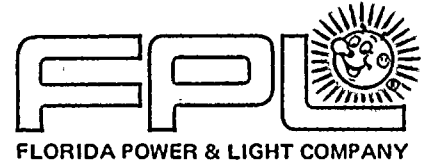
J. W. Williams, Jr.
Group Vice President
Nuclear Energy

JWW/TCG/cab

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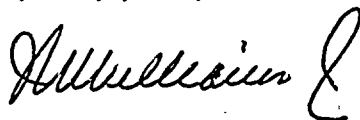
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Very truly yours,



J. W. Williams, Jr.
Group Vice President
Nuclear Energy

JWW/TCG/cab

ATTACHMENT I

SUMMARY SCHEDULE

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ATTACHMENT 2

APPENDIX R

SUMMARY SCHEDULE

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ATTACHMENT 3

TURKEY POINT SCHEDULED WORK PLAN

Florida Power & Light Company has recently completed a scheduling re-evaluation for all presently committed modification work at Turkey Point Plant Units 3 & 4. In order to fulfill all schedule commitments a craft peak of 960 personnel for a two month period during the upcoming Unit 3 outage, and approximately 750 personnel during non-outage periods prior to the outage would be required. A special task team which included key project, construction and operations personnel has concluded that these levels of craft personnel could adversely impact unit reliability and plant safety during operation and would be unmanageable during outage and non-outage conditions. An alternative backfit schedule was developed to meet the following objectives:

Successfully complete all known modifications, including TMI commitments, Appendix R modifications, alternate Shutdown Capability, Performance Enhancement Program commitments, and personnel safety enhancements, in a realistic time frame without adversely impacting the safe operation of the plant, the ability of the plant operators to function in accordance with existing procedures during an off-normal event, and without impacting the safety of plant personnel or the general public.

In order to accomplish these objectives it was necessary to limit first and second shift construction personnel while the units are operating. Also during unit operation we plan to utilize trained and experienced area coordinators when modifications work is being performed in critical areas of the plant to ensure proper adherence to procedural process and preclude any challenges to the safety systems resulting from inadvertent actuation or tripping of critical equipment. Additionally, first and second shift construction personnel will be limited during outages in order to assure a manageable backfit program and to provide additional assurance that there will be minimal impact on the operating unit.

The resultant schedule has caused slippages in various portions of our 10 CFR 50 Appendix R fire protection backfit program. Discussion of these schedule changes and requests for specific exemptions follow.

FPL will continue to perform compensatory measures described in Technical Specifications; 3.14, "Limiting Conditions for Operations for Fire Protection Systems" and 4.15, "Surveillance Requirements for Fire Protection Systems" and Plant Procedures; administrative procedure 0103.13, "Firewatch Patrol" and off normal operating procedure 15538, "Fire and Smoke Detection System and Fixed Fire Protection Equipment/Systems Operating Instructions".

UNIT 3 AND 4 WATER SUPPRESSION SYSTEMS

FPL initially had identified Unit 3 and 4 water suppression systems as work that could be completed during normal plant operations. FPL's current commitment for Appendix R water suppression systems at Turkey Point is January 31, 1985.

Since FPL's initial commitment for water suppression, problems in qualifying potential vendors to "important to safety" criteria developed. This resulted in delays in developing engineering designs. Once vendors were chosen FPL's purchasing department experienced problems in obtaining firm equipment commitments from vendors. This resulted in both design detail delays and equipment delivery delays at the site. Due to these delays we are not able to meet our January 31, 1985 commitment. We have revised our scheduled implementation date for water suppression to April 1985 for Unit 3 & 4. Therefore FPL is requesting a scheduler exemption for water suppression systems to April 1985.

UNIT 3 AND 4 FIRE DAMPERS

As you are aware, the ventilation systems for the auxiliary and control buildings are shared by Units 3 & 4. This precludes a complete ventilation system shutdown during a single unit outage. FPL's existing commitment for the installation of fire dampers is January for non-outage related damper work. To date, FPL has experienced difficulties in vendor qualification and vendor drawing approval. These difficulties have delayed the development of detailed engineering packages, thus effecting construction completion dates. More importantly, as FPL progressed through the development of the detailed design, it has become increasingly evident that damper modification work will have a significant impact on the existing ventilation system, particularly the exhaust side of the system. A number of dampers associated with Appendix R will be installed in the exhaust side of the system located in the auxiliary building. In order to promote plant and personnel safety, a detailed design implementation plan is being developed for installation of these dampers. Design and installation of a temporary system may be required prior to damper installation in the permanent system. In order to implement the damper modifications in a safe and controlled manner, FPL is requesting an extension to the conclusion of the Unit 4 outage presently scheduled for December, 1985. FPL will commence working damper modifications beginning January, 1985, and will work continuously through completion in December of 1985.

UNITS 3 & 4 RACEWAY PROTECTION

Final hanger/support installations and raceway tie-ins associated with the Unit 3 cable reroute outage related work will necessitate completion of the Unit 3 raceway protection additions in the 30 day period immediately following the completion of the Spring 1985 refueling outage. Therefore, FPL is requesting a schedule exemption to complete Raceway Protection to 30 days after the Unit 3 refueling outage.

UNITS 3 & 4 STRUCTURAL STEEL FIREPROOFING

FPL's position on structural steel fireproofing is that this work should be performed after all other cable rerouting, electrical supports, and raceway protection associated with Appendix R modifications and other Plant enhancement

work has been completed on an area by area basis. This position is dictated by both prudent job management and economic cost considerations.

For these reasons, FPL is requesting a schedule exemption for this work activity and is proposing that completion of structural steel fireproofing be extended to the 30 day period immediately following the completion of the Winter 1985 Unit 4 refueling outage.

UNITS 3 ALTERNATE SHUTDOWN CAPABILITY

FPL's present plan is to vigorously pursue alternate shutdown capability modifications on an ongoing basis, performing as much work as possible, except terminations, during the Spring 1985 Unit 3 refueling outage and completing the Unit 3 work in the Winter 1986 refueling outage.

The Unit 3 schedule slippage is primarily due to vendor related problems ranging from vendor qualification, timely submittal and approval of vendor drawings, and most importantly, to delivery of vendor supplied materials - some of which will not be received until after completion of the presently scheduled Spring 1985 Unit 3 refueling outage.

Additionally, manpower requirements necessary to meet the existing NRC committed completion date would far exceed those limitations established to maintain safe plant operation, in particular the execution of non-outage related work activities.

Terminations and startup activities for Unit 4 will be performed during the Winter 1985 refueling outage, and completion of the Unit 3 work will occur during the Winter 1986 refueling outage. FPL therefore requests a schedule exemption through the completion of the Winter 1986 Unit 3 refueling outage.

PENETRATION SEALS

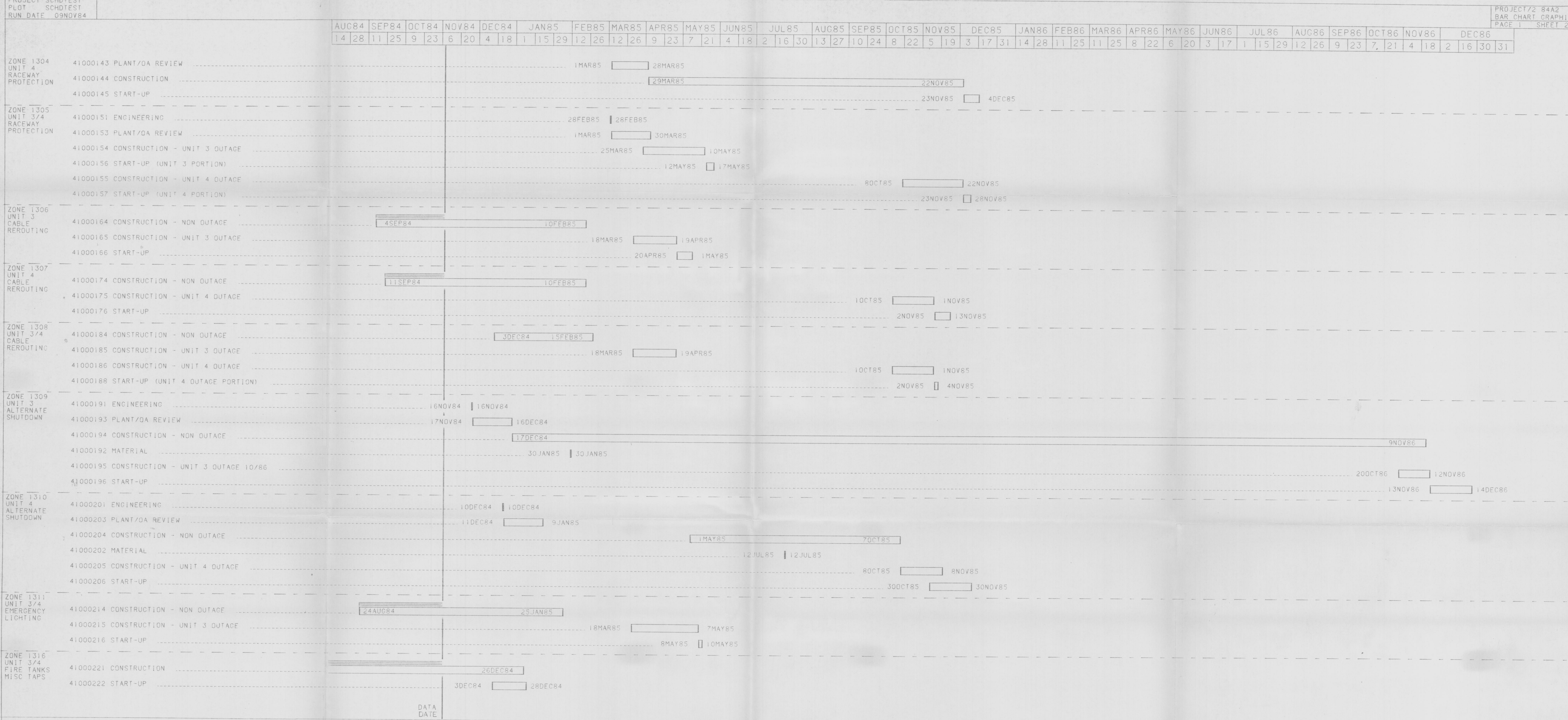
Penetration seals can not economically be completed until a large portion of Appendix "R" modification work has been completed, specifically cable pulling and raceway rerouting. FPL penetration seal work plans call for seals to be installed at a rate of 60 seals per month. This rate is based on previous FPL experiences at St. Lucie Unit 2. At this rate of work, Appendix "R" seals cannot be completed until one month after the Unit 4 refueling outage conclusion currently scheduled for December 1985. Therefore, FPL is requesting a schedule exemption for this scope of work to January 1986.

SUMMARY

In summary, FPL is attempting to accomplish a significant quantity of work in a realistic time frame. It should be recognized, from your review of Attachment I, that FPL will successfully complete a large majority of required modifications. It should also be recognized that FPL's schedule reflects the accomplishment of

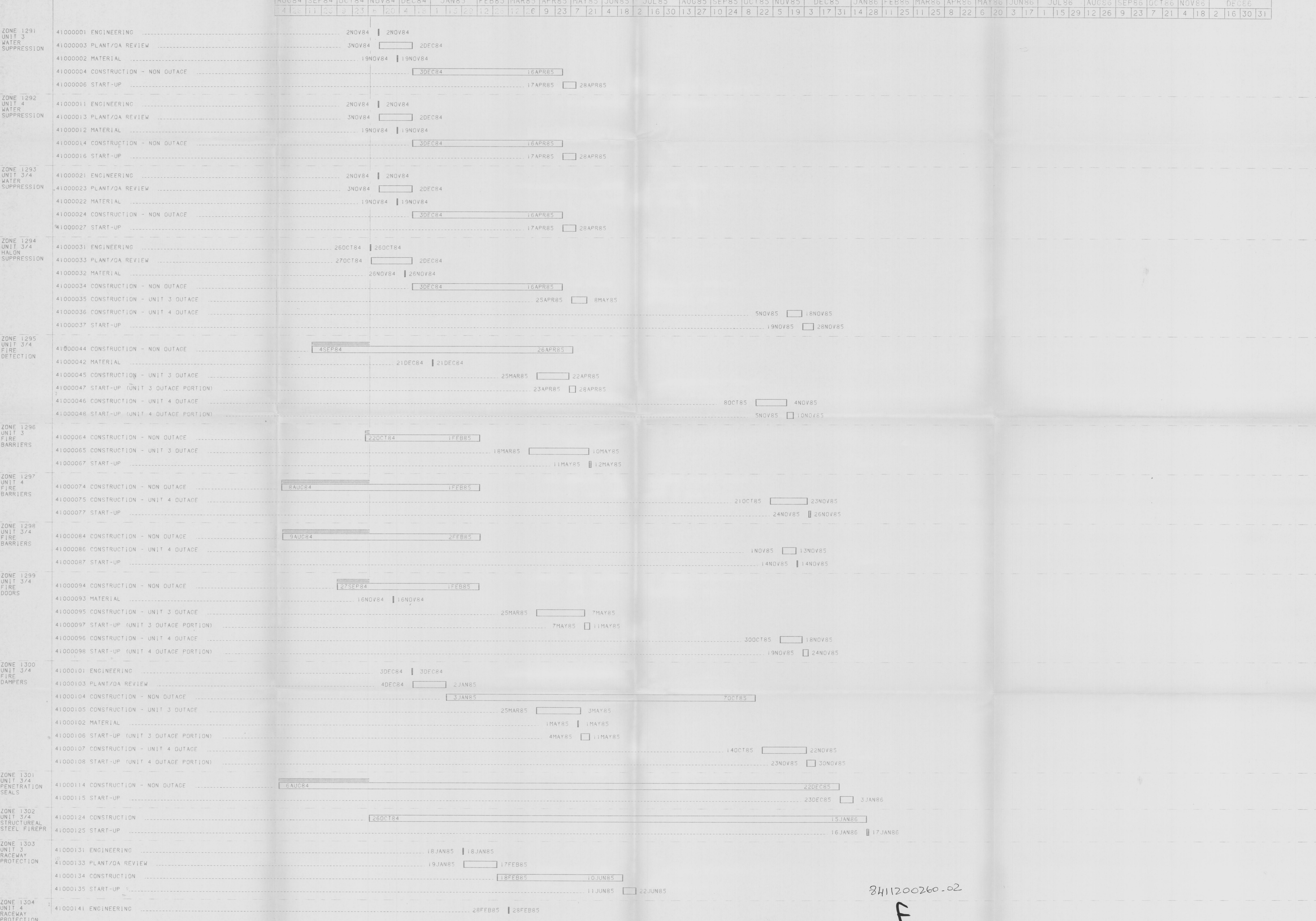
those modifications without unduly placing the operation of the plant in a disruptive condition. FPL strongly believes that our present approach to ensuring safe and manageable plant operations outweighs any critical necessity to complete certain modification work per our present commitments. FPL, therefore, respectfully requests the following schedule exemptions:

1. Unit 3 and 4 water suppression to April 1985. This represents a three (3) month delay.
2. Unit 3 and 4 fire dampers to be installed by December 1985. This represents a twelve month delay for Unit 3 and 4 dampers.
3. Unit 3 raceway protection will be completed 30 days after the Unit 3 spring refueling outage.
4. Structural steel fireproofing will be completed one month after the Unit 4 winter refueling outage. This represents a twelve (12) month delay for Unit 3 and 4.
5. Alternate shutdown capability will be completed for Unit 4 by December 1985. Alternate shutdown capability for Unit 3 will be completed by the winter 1986 refueling outage. This represents no delay for Unit 4 but an eighteen (18) month delay for Unit 3 alternate shutdown.
6. Penetration seals for the current work scope to be completed by January 1986. This represents a twelve (12) month delay for Unit 3 and Unit 4.



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