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50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251
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WILLIAMS,J.W. Florida Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
VARGA,S.A. Operating Reactors Branch 1

SUBJECT: Forwards clarification of NRC questions re schedule to complete App R work items & compensatory measures to be implemented until App R work tasks complete,in support of 841116 fire protection schedular exemptions request.

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FLORIDA POWER & LIGHT COMPANY

December 14, 1984
L-84-375

Office of Nuclear Reactor Regulation
Attention: Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Varga:

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

In order to support the schedular exemptions requested by FPL letter L-84-331, dated November 16, 1984, Florida Power & Light is providing clarifications and compensatory measures discussed between the NRC and FPL on December 10, 1984. Attachment 1 contains clarifications to NRC questions concerning FPL's schedule to complete Appendix "R" work items. Attachment 2 contains compensatory measures that will be implemented until Appendix "R" work tasks can be completed.

Should any questions arise, please call us.

Very truly yours,

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

JWW/RWG/cab

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ATTACHMENT I

When considering the work scope of the items for which FPL is requesting schedular relief, emphasis must be placed on vendor status for each work item. Vendors associated with this work have been unable to complete the qualification process in a reasonable period of time. This caused design documents to be delayed. FPL procurement has expedited fabrication and delivery of fire dampers, water suppression, halon suppression and major material requirements for alternate shutdown in the past months. Although these items have had substantial vendor incurred delivery delays, many procurement items have been delivered and are currently being installed at Turkey Point. Material for fire doors, fire barriers, fire detection, penetration seals, cable reroute and emergency lighting have been successfully expedited in order to complete as much modification work as possible prior to the original commitment date of January 31, 1985.

Other scheduled plant modifications were considered when generating the Appendix "R" work plan including TMI upgrades, safety related equipment qualification and the Performance Enhancement Program. The cumulative effect of all scheduled work increased forecast manpower requirements for the upcoming Unit 3 outage. The projected manpower level prior to the outage would exceed a number that FPL considered safe from an operations standpoint. In addition, the majority of this work has been fully designed and all procurement requirements have been satisfied in order to support existing schedule commitments. A portion of this work has already been impacted by past schedule delays.

As a result of the circumstances involved with Appendix "R" related work, it became evident that a schedule exemption would be required. In this way operation of the two nuclear units at Turkey Point will continue in a safe and controlled manner.

Below is a projected status of the fire protection work at Turkey Point as of January 31, 1985.

1. Units 3/4 water suppression - hangers will be fabricated and installation will be started by January 31, 1985.

2. Units 3/4 halon suppression - hangers will be fabricated and installation will be started by January 31, 1985.

3. Units 3/4 fire detection - Listed below is the projected completion status of fire detection as of January 31, 1985.

AREA	COMPLETE BY 1-31-85
Turbine Building	40%
Auxiliary Building	95%
Control Building	90%

4. Units 3/4 Fire Barriers - All but three fire barriers located outside containment will be complete by January 31, 1985. Radiant energy shields inside the containments and the barriers located in the stairwells leading to the RHR rooms will be completed during the next respective unit refueling outage. A wall in the Inverter room will be erected after all inverter replacements are completed by the end of the next Unit 4 refueling outage. Projected barrier completion:

AREA	COMPLETE BY 1-31-85	RESPECTIVE UNIT REFUELING OUTAGE
Containments	0	All
Turbine Building	7	0
Auxiliary Building	3	2
Control Building	0	1*

5. Units 3/4 Fire Doors - Most major material deliveries for this job are on site. Outstanding items include one door and miscellaneous hardware. Doors expected to be complete by January 31, 1985 are shown below.

AREA	COMPLETE BY 1-31-85	RESPECTIVE UNIT REFUELING OUTAGE
Turbine Building	14	0
Auxiliary Building	7	7
Control Building	11	1*

6. Units 3/4 Fire Dampers - Fabrication of the fire dampers is on hold pending part 21 resolution of qualification problems with the vendor.

7. Units 3/4 Penetration Seals - Approximately 380 seals out of 1050 will be complete by January 31, 1985.

8. Units 3/4 Cable Reroute - All conduit for Cable Reroute will be complete with the exception of the DC equipment room on elevation 30 and the Inverter room on elevation 42, by January 31, 1985. Design for these rooms is expected to be issued before January 31, 1985 and raceway installation will be completed thereafter. The remaining terminations will be made during the respective unit outages.

9. Units 3/4 Alternate Shutdown - Engineering design documents will be available to begin installation for Unit 3 by January 31, 1985.

*only applicable to Unit 4.

ATTACHMENT 2

I. Compensatory measures for schedular exemptions not including alternate shutdown.

A. FPL will implement a roving fire watch to cover all areas for which schedular relief has been requested.

B. The watch will be implemented January 31, 1985 and continue until all fire protection work identified for "Appendix R" for each fire zone has been completed and operable. The Plant Manager - Nuclear will determine when the watch will terminate.

C. All procedures and training needed for the roving watch will be completed and "in-place" prior to the watch implementation date.

D. The roving fire patrol will perform the following:

1) Identify any indication of fire, smoke, or burning odor and will immediately notify the control room.

2) Be aware of fire extinguishers in his area and be trained in their proper use.

3) Be familiar with his area of responsibility and method of reporting a fire to the Control Room.

4) Will log-in on specific zones in his fire area every 20 minutes on appropriate log sheets.

5) Each fire watch will have a route map clearly identifying his area.

II. Compensatory measures for alternate shutdown

A) FPL will implement a 24 hour, 7 day per week fire watch in the cable spreading room, area known as the auxiliary building north south breezeway and control room.

B) The watch will be implemented prior to Unit 3 start-up after the 1985 spring refueling outage and continue until the Unit 3 alternate shutdown work is completed.

C) All procedures and training required for the permanent watch will be completed and "in-place" prior to the watch implementation date.

D) The alternate shutdown watch will perform the following:

1) Identify any indication of fire, smoke or burning odor and will immediately notify the control room.

2) Will be aware of fire extinguishers in his area and be trained in their proper use.

3) Will be familiar with his area of responsibility and method of reporting a fire to the control room.

4) Continuously watch his fire zone with 20 minute surveys within the area.