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 WOODY, C.O. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Discusses resolution of fire induced spurious closure of vol
 control tank outlet valve.

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FPL

P.O. Box 14000, Juno Beach, FL 33408-0420

AUGUST 2 1989

L-89-275

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Gentlemen:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Fire Induced Spurious Closure of Volume Control
Tank (VCT) Outlet Valve

By letter L-89-191 dated May 19, 1989, which transmitted Licensee Event Report (LER) 89-09, Florida Power & Light Company (FPL) reported an apparent Appendix R Safe Shutdown Analysis design inadequacy at the Turkey Point nuclear facility. The problem involves a scenario where a spurious closure of an isolation valve, between the VCT and the charging pump, could be induced by a fire.

While investigating long term corrective actions to resolve this problem, FPL was made aware, through discussions with your Plant Systems Branch (SPLB), of a recent NRC disposition of this issue. The SPLB evaluated a similar situation that existed in a Westinghouse Pressurized Water Reactor (PWR) with the same design considerations as described in LER 89-09. Based upon their evaluation, the SPLB allowed credit for timely operator action from the control room to protect the charging pumps.

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In determining FPL's resolution of this issue the following factors were considered:

- 1) A fire alarm from the areas of concern is already in existence and functional in the control room.
- 2) Operator actions from the control room can be performed on a timely basis. (re: Procedures 3/4-ONOP-016.9, "Response to a Reported Fire in the Charging Pump Room, Rod Control Equipment Room, Cable Spreading or Control Room").
- 3) There is an extremely low probability of a fire in the charging pump room (or rod control equipment room) which will affect both the RWST alternate water source supply valve and the VCT isolation valve.
- 4) An alternate design modification will result in additional failure modes during the normal performance of the system's safety functions, thus increasing the risk of failure during accident conditions.

Based upon the foregoing discussion FPL considers its review of long term corrective actions to address the concern to be complete, and that no modifications are necessary. In addition, no further need exists for fire watches to be stationed in the charging pump room or the rod control equipment room. FPL is planning to discontinue these fire watches 30 days from issuance date of this letter.

Should you have any questions concerning the above please contact us.

Very truly yours,


C. O. Woody
Acting Senior Vice President - Nuclear

COW/RWG/cm

cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC
Site Resident Inspector, USNRC, Turkey Point Plant

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