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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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 PLUNKETT, T.F. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Proposes that enhanced roving watch be performed every 30 minutes in lieu of continuous fire watch for open manholes or electrical raceways during emergency power sys enhancement outage.

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FEB 07 1991

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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
Emergency Power System Enhancement Outage Fire Protection

Florida Power and Light (FPL) Turkey Point Units 3 and 4 are currently in a dual unit outage with both units defueled and Emergency Diesel Generators disabled. With both units defueled, the plant configuration and outage work is controlled under a set of additional temporary plant procedures and a 10 CFR 50.59 safety evaluation. This approach has previously been discussed with the NRC at a meeting on July 17, 1990, and conveyed to the NRC by FPL letter L-90-352 dated October 5, 1990.

Currently, electrical raceways and open manholes which have ongoing work, have in place continuous fire watches. Based on the current plant conditions and a review of applicable Appendix R requirements, FPL's interpretation of Technical Specification 3.7.9 is that continuous fire watches for these areas, under these conditions, are not required or needed. In lieu of the continuous fire watch for open manholes or electrical raceways, FPL proposes an enhanced roving watch to be performed every 30 minutes. FPL proposes to begin this process on February 7, 1991. This condition will remain in effect until entry into Mode 6, currently scheduled for August 31, 1991. However, continuous hot work permit designated fire watches are still used for applicable hot work being performed or to meet requirements in certain fire rated areas.

Should you have any questions regarding the information included in this letter, do not hesitate to contact us.

Very truly yours,

T.F. Plunkett by J. Pearce

T. F. Plunkett
Vice President
Turkey Point Plant-Nuclear

TFP/DRP/ds

cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC
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