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## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9204210062 DOC. DATE: 92/02/19 NOTARIZED: NO DOCKET #  
 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250  
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 RECIP. NAME EBNETER, S.D. RECIPIENT AFFILIATION Region 2 (Post 820201)

SUBJECT: Requests 72 h temp waiver of compliance w/TS 3.6.1.3,  
 "Containment Air Locks." Inner air locks door satisfactorily  
 vacuum tested & administrative control of door positions  
 will be maintained by dedicated operator.

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Stewart D. Ebnetter  
Regional Administrator, Region II  
U. S. Nuclear Regulatory Commission  
101 Marietta St., N.W., Suite 2900  
Atlanta, GA 30323

Mr. Stewart D. Ebnetter:

Re: Turkey Point Unit 3  
Docket No. 50-250  
Operation During Repair of the Emergency Escape Hatch  
Interlock  
Temporary Waiver of Compliance

This letter documents Florida Power and Light's request of Region II for a 72 hour temporary waiver of compliance with Technical Specification 3.6.1.3, "Containment Air Locks," Action statement b.,

"With the containment air lock inoperable, except as the result of an inoperable air lock door, maintain at least one airlock door closed; restore the inoperable air lock to OPERABLE status within 24 hours or be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

Since the inner air lock door has been satisfactorily vacuum tested and administrative control of the door positions will be maintained by a dedicated operator, no significant safety hazards or environmental impacts exist.

On February 18, 1992 during the performance of 3-OSP-051.6, "Containment Air Lock Doors Operability Test" on the Unit 3 emergency escape hatch, personnel performing the test were able to break the seal on the inner door during an attempt to force open the inner door with the outside door closed and the interlocks set to open the outer door. The door could not be freely opened but an apparent leak path could be created. When the interlocks operate as designed the inner door can not be opened with the interlocks set for the outer door to open. The interlocks were not considered functional and therefore the containment emergency air lock was considered inoperable due to a cause other than an inoperable air lock door. Unit 3 then entered the above action statement at 1312 hours and repair of the interlocks began.

Current repair efforts of the interlocks have been partially successful. Complete repair or replacement of the interlock system is expected to be completed within the next 24 hours. A representative of the Chicago Bridge and Iron Corporation, manufacturer of emergency hatch systems, has been asked to come to

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or FPL Group company

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the site to aid in the repair of the cam interlock system.

Currently both the inner and outer doors are closed except during the repair effort. A vacuum test of the inner door was performed to verify the integrity of the inner door seal.

The surveillance requirements of 4.6.1.3.c. state: "At least once per 6 months by verifying that only one door in each air lock can be opened at a time." Since the interlock between the inner and outer doors failed and is considered inoperable, therefore Technical Specification 3.6.1.3 is not met.

Draft NUREG 1431, WOG Merits Program Phase III, Standardized Technical Specifications for Westinghouse Plants provides an Action statement which allows for the locking of doors and 31 days for repair with an air lock door interlock mechanism inoperable in one or more air locks as long as an operable door is closed. The WOG Merits also permits entry and exit into containment under the control of a dedicated operator. Until the air lock is repaired, a dedicated individual will be stationed at the emergency air lock to ensure that only one door is opened at a time and that the door does not remain open any longer than is required.

This request has been reviewed by the Plant Nuclear Safety Committee and approved by the Plant General Manager.

This administrative control of the position of the doors is in place.

If you have any questions concerning this issue please contact us.

Very truly yours,



T. F. Plunkett  
Vice President  
Turkey Point Nuclear

TFP/JEK/jek

cc: Document Control Desk, USNRC  
Raj Auluck, Project Manager, NRR, USNRC  
Senior Resident Inspector, USNRC, Turkey Point Plant