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SUBJECT: Requests temporary waiver of compliance from TS Action a of  
 3.7.8.2 re spray &/or sprinkler sys to allow suspension of  
 six continuous fire watches currently in place in EDG bldgs  
 for initial 3 h period & subsequent 2 h period.

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FPL

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SEP 04 1992

L-92-259  
10 CFR 50.36

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  
Spray and/or Sprinkler Systems Continuous Fire Watch  
Temporary Waiver of Compliance

This letter requests the Nuclear Regulatory Commission's approval of a temporary waiver of compliance of Technical Specification (TS) Action a of 3.7.8.2, "Spray and/or Sprinkler Systems." The proposed waiver allows suspension of 6 continuous fire watches currently in place in the Unit 3 and Unit 4 Emergency Diesel Generator (EDG) buildings for an initial 3 hour period and subsequent 2 hour periods, until the controlled demolition of the Turkey Point Fossil Unit 1 Stack. A reinspection of the EDG buildings to assure that no undetected fires exist following the initial 3 hour period, and at each 2 hour period thereafter, will be performed until the demolition is complete.

Hurricane Andrew passed over the Turkey Point Plant on August 24, 1992, causing damage to fire suppression equipment. Selected site damage incurred during the hurricane also includes substantial structural damage to the Turkey Point Fossil Unit 1 stack. Although the Unit 1 stack remains standing, the extensive damage has raised the concern that the stack may not survive another high wind event. This condition necessitates that this potential hazard to the Turkey Point Nuclear Units and personnel be expeditiously removed. The stack will be demolished under controlled conditions, with the direction of the fall being to the NE, away from the nuclear units. This will be accomplished using explosives since this approach will remove the threat of an uncontrolled stack collapse in the shortest possible time.

**Technical Specification Requirements:**

Action a of TS 3.7.8.2, "Spray and/or Sprinkler Systems," states "With one or more of the above required Spray and/or Sprinkler Systems inoperable, within 1 hour establish a continuous fire watch with backup fire suppression equipment." Hurricane Andrew caused substantial damage to the Fire Water Supply and Distribu-

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tion System at Turkey Point. As automatic actuation of the fire spray and suppression system could not occur due to the absence of fire main header pressure, Turkey Point entered Action a of TS 3.7.8.2 and established continuous fire watches in accordance with the above action requirements.

#### **Circumstances Surrounding the Situation**

A safety evaluation has concluded that a stack fall in a direction outside of the predicted zone would be extremely unlikely. Though the likelihood of injury to the fire watch personnel in the Unit 3 and Unit 4 Emergency Diesel Generator (EDG) buildings due to the demolition is small, the fire watches will be suspended for a short time in order to assure the personal safety of the fire watch personnel. This waiver allows suspension of the continuous fire watch in the EDG buildings until the controlled demolition of the Turkey Point Fossil Unit 1 Stack.

#### **Preliminary Evaluation of Safety Significance**

This waiver request is for relief, for a short duration, from Action statement a of TS 3.7.8.2. FPL has available backup fire suppression equipment. Fire detection is located in the EDG building areas. Additionally, a reinspection of the EDG buildings to assure that no undetected fires exist following the initial 3 hour period, and at each 2 hour period thereafter, will be performed until the demolition is complete. As fire detection and protection are available to the EDG buildings during the absence of the continuous fire watches, the health and safety of the public will not be affected.

#### **Duration of the Request**

This waiver request is expected to be for a short period, as the Unit 1 stack is expected to be demolished on September 4, 1992.

Verbal approval of a request to waive Action a of TS 3.7.8.2 for 3 hours was granted by the NRC on September 4, 1992, at approximately 0200. Subsequently, the demolition was delayed on several occasions, and the NRC granted additional 2 hour periods (with intervening inspections) until the stack demolition is completed.

#### **Compensatory Measures**

FPL has available backup fire suppression equipment. Fire detection is located in the EDG building areas. Additionally, a reinspection of the EDG buildings following the initial 3 hour period, and at each 2 hour period thereafter, will be performed until the demolition is complete.

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### No Significant Hazard Consideration

The commission has provided standards for determining whether a significant hazards consideration exists (10 CFR 50.92(c)). A proposed waiver of compliance involves no significant hazards consideration if operation of the facility in accordance with the proposed waiver would not

- (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or
- (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or
- (3) involve a significant reduction in a margin of safety.

Turkey Point has determined that operation in accordance with the proposed waiver would not:

- (1) involve a significant increase in the probability or consequences of an accident previously evaluated.

During the short period of time the waiver would be in effect, fire protection capability would be available to the EDG buildings. Additionally, in case of fire, alarms actuate both locally and in the control room. The temporary suspension of the continuous fire watch does not affect assumptions contained in plant safety analyses, the physical design and/or operation of the plant, nor does it affect Technical Specifications that preserve safety analysis assumptions. Therefore, operation under the proposed waiver does not affect the probability or consequences of accidents previously analyzed.

- (2) create the possibility of a new or different kind of accident from any accident previously evaluated.

During the short period of time the waiver would be in effect, fire protection capability would be available to the EDG buildings. Additionally, in case of fire, alarms actuate both locally and in the control room. The temporary suspension of the continuous fire watch will not lead to material procedure changes or to physical modifications. Therefore, operation under the proposed waiver does not create the possibility of a new or different kind of accident.

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- (3) involve a significant reduction in a margin of safety.

During the short period of time the waiver would be in effect, fire protection capability would be available to the EDG buildings. Additionally, in case of fire, alarms actuate both locally and in the control room. Therefore, the proposed waiver does not involve a significant reduction in the margin of safety, nor would the consequences of an accident be increased. Thus, the proposed waiver does not involve a reduction in the margin of safety.

Based on the above, FPL has determined that the proposed temporary waiver of compliance does not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; (2) create the probability of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety; and therefore does not involve a significant hazards determination as defined in 10 CFR 50.92.

#### No Irreversible Environmental Consequences

Suspension of the continuous fire watches for the short periods discussed above does not involve irreversible environmental consequences. This temporary waiver of compliance does not result in any physical change to the plant. Therefore, issuance of this waiver will not place the plant in a condition that compromises the health and safety of plant personnel or the general public.

Should there be any questions, please contact us.

Very truly yours,

*T.F. Plunkett by [Signature]*  
T. F. Plunkett  
Vice President  
Turkey Point Nuclear

TFP/GS

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

