

# CATEGORY 1

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       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  
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SUBJECT: Responds to NRC 960818-961028 ltr re violations noted in  
 insp rept 50-250/96-11 & 50-251/96-11. Compensatory measures  
 will remain in place until Thermo-Log barrier upgrades are  
 completed.

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FPL

Florida Power & Light Company, P.O. Box 14000, Juno Beach, FL 33408-0420

NOV 12 1996

L-96-285  
10 CFR 2.201

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

Re: Turkey Point Units 3 & 4  
Docket Nos. 50-250/251  
Reply to Notice of Violation  
NRC Inspection Report 96-11

Florida Power & Light Company has reviewed the subject inspection report and, pursuant to 10 CFR 2.201, the required response is attached.

If there are any questions, please contact us.

Very truly yours,

T. F. Plunkett  
President  
Nuclear Division

OIH

Attachment

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

9611210148 961112  
PDR ADOCK 05000250  
G PDR

FE01

REPLY TO NOTICE OF VIOLATION

RE: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
NRC Inspection Report 96-11

FINDING

"During an NRC inspection conducted on August 18 to September 28, 1996, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," (60 FR34381; June 30, 1995), the violation is listed below:

10 CFR 50.48, Fire Protection, states, in part, that:  
.....all nuclear power plants licensed to operate prior to January 1, 1979, shall satisfy the applicable requirements of Appendix R to this part, including specifically the requirements of Sections III.G, III.J, and III.O.

10 CFR 50, Appendix R, Section III.G.2, states, in part, that: .... where cables or equipment, ....., of redundant trains of systems necessary to achieve and maintain hot shutdown conditions are located within the same fire area, outside of primary containment, one of the following means of ensuring that one of the redundant trains is free of fire damage shall be provided:

- a. Separation of cables and equipment and associated non-safety circuits of redundant trains by a fire barrier having a 3-hour rating; or
- b. Separation of cables and equipment and associated non-safety circuits of redundant trains by a horizontal distance of more than 20 feet with no intervening combustibles or fire hazards. In addition, fire detectors and an automatic fire suppression system shall be installed in the fire area; or
- c. Enclosure of cables or equipment and associated non-safety circuits of one train in a fire barrier having a one hour fire rating. In addition, fire detectors and an automatic fire suppression system shall be installed in the fire area.

10 CFR 50 Appendix B, Criterion III, Design Control, requires, in part, that measures shall be established to assure that applicable regulatory requirements (including 10 CFR 50, Appendix R) are correctly translated into specifications. Further, Criterion III requires that design changes be subject to design control measures which provide for verifying or checking the adequacy of design.

Contrary to the above, Fire Zone 64 was designed and installed with a one hour barrier vice a three hour barrier in 1983. Additionally, Fire Zone 143 was also designed and installed with a one hour barrier vice a three hour barrier in 1991. Further, no fire detectors and/or automatic fire suppression systems existed for either of these fire zones. The two fire zones were required to meet 10 CFR 50, Appendix R, III.6.2, as delineated in the Fire Hazards Analysis report in Updated Final Safety Analysis Report section 9.6A. Since 1992, these two areas have been properly compensated for with fire watches as specified in NRC Bulletin 92-01.

This is a Severity Level IV violation (Supplement I)."

#### RESPONSE TO FINDING

1. Florida Power & Light Company (FPL) concurs with the finding.
2. Reason for the violation:
  - A. FPL failed to provide adequate design control in that the design and construction of the Thermo-Lag fire barriers for these conduits did not identify Fire Zone 64 as an indoor area requiring a 3 hour fire barrier. Fire Zone 64, the control building elevator vestibule, has unique construction features. The walls of Fire Zone 64 adjacent to the outdoor zones are not rated fire walls and the entrance into the area is open to the outdoors. Fire Zone 64 has a ceiling which distinguishes it from the adjacent outdoor zones which have appropriate exemptions. The 1 hour rated fire barrier installed on the conduits on the outdoor side of Fire Zone 64 was continued inside the Fire Zone 64 elevator vestibule.
  - B. FPL failed to provide adequate design control in that Fire Zone 143, the roof of the Unit 3 emergency diesel generator building, was considered to be a subdivision of the surrounding outdoor zones, which have approved exemptions to allow use of a 1 hour rated fire barrier. Therefore, an exemption for Fire Zone 143 was not requested. Fire Zone 143, was created during the emergency power systems enhancement project to facilitate the safe shutdown analysis. The essential cables were protected with a 1 hour rated fire barrier which is consistent with the protective features that already exist in the plant for the surrounding outdoor fire zones. Fire Zone 143 was initiated as a convenience for the purposes of identifying the route of the new cables.
3. Corrective steps which have been taken and the results achieved:
  - A. Compensatory measures in the form of fire watches for Fire Zones 64 and 143 were in place at the time the deficiencies were identified. These compensatory actions had previously been implemented as part of FPL's response to NRC Bulletin 92-01.



- B. A plant modification package has been issued to reflect the 3 hour rated fire barrier design requirement for essential cables located in Fire Zone 64.
  - C. Fire Zone 143 was included as part of an exemption request for all outdoor areas submitted to the NRC by FPL letter L-94-146, dated June 15, 1994. At the request of the NRC, FPL withdrew the exemption request on June 28, 1996, by FPL letter L-96-148.
4. Corrective actions which will be taken to prevent further violations:
- A. As a result of NRC Bulletin 92-01, and consistent with FPL letter L-92-218 dated July 23, 1992, compensatory measures are in place for Turkey Point's Thermo-Lag fire barriers including Fire Zones 64 and 143. These compensatory measures will remain in place until the Thermo-Lag fire barrier upgrades are completed.
  - B. Fire zones using Thermo-Lag fire barrier systems at Turkey Point are being addressed as part of the overall Thermo-Lag upgrade program. The Thermo-Lag upgrade program includes a review of the fire barrier design requirements for indoor and outdoor areas.
  - C. Since 1991, the FPL Nuclear Engineering Department has strengthened its technical expertise, design production capability and involvement in the design change process. FPL significantly reduced reliance on contractors and increased technical oversight of remaining contractor engineering work.
5. The date when full compliance was or will be achieved:
- A. Fire Zone 64, an indoor area, will continue to have compensatory measures in place until the indoor Thermo-Lag fire barrier upgrades are completed. Fire Zone 64, an indoor area, will be restored to meet 10 CFR 50, Appendix R, Section III.G.2, by the end of the Unit 4 refueling outage currently scheduled for the Spring of 1999, as specified by FPL letter L-96-236, dated September 27, 1996.
  - B. Fire Zone 143, an outdoor area, will continue to have compensatory measures in place until the outdoor Thermo-Lag fire barrier upgrades are completed. Fire Zone 143 will be addressed as part of FPL's changes to the fire protection features and fire barrier design for cable raceway enclosures using Thermo-Lag for outdoor applications. FPL's next submittal on outdoor fire barrier areas will be made by December 16, 1996.



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