

January 24, 2001

Mr. Thomas F. Plunkett
President - Nuclear Division
Florida Power & Light Company
P. O. Box 14000
Juno Beach, FL 33408-0420

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE
TURKEY POINT, UNITS 3 AND 4, LICENSE RENEWAL APPLICATION

Dear Mr. Plunkett:

By letter dated September 8, 2000, Florida Power and Light (FPL), submitted for the Nuclear Regulatory Commission's (NRC) review an application pursuant to 10 CFR Part 54, to renew the operating license for Turkey Point Nuclear Plant, Units 3 and 4. The NRC staff is reviewing the information contained in the license renewal application and has identified, in the enclosure, areas where additional information is needed to complete its safety review. Specifically, the enclosed questions relate to Section 2.3.3.14, "Fire Protection."

Please provide a schedule by letter, electronic mail, or telephonically for the submittal of your responses within 30 days of the receipt of this letter. Additionally, the staff would be willing to meet with FPL prior to the submittal of the responses to provide clarifications of the staff's requests for additional information.

Sincerely,

/RA/

Rajender Auluck, Senior Project Manager
License Renewal and Standardization Branch
Division of Regulatory Improvement Program
Office of Nuclear Reactor Regulation

Docket Nos. 50-250 and 50-251

Enclosure: Request for Additional Information

cc w/encl: See next page

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REQUEST FOR ADDITIONAL INFORMATION
TURKEY POINT UNITS 3 AND 4

Section 2.3.3.14 Fire Protection

RAI 2.3.3.14-1: On Fire Protection License Renewal Boundary Drawings, 0-FP-04 and 0-FP-05, fire hydrants are shown as being within the scope of license renewal. Fire hydrants are neither listed in Section 2.3.3.14 - Fire Protection, of the License Renewal Application (LRA) nor in Table 3.4-14 - Fire Protection. Clarify why fire hydrants are not included in the fire protection portion of the LRA.

RAI 2.3.3.14-2: The LRA application, Section 2.3.3.14 - Fire Protection, states that fire extinguishers, fire hoses, and air packs are not subject to an AMR. The March 10, 2000, letter from C. I. Grimes to D. J. Walters which is referenced in Section 2.3.3.14 is not a generic exemption, it allows 'plant specific' exclusions when the applicant (1) identifies and lists in the LRA each component type subject to such replacement, and (2) identifies the applicable programs that conform to appropriate standards (e.g., for fire protection components - applicable NFPA standards and 42 CFR Part 84). Although the letter is referenced in the LRA, plant specific programs are not delineated. Identify the applicable programs and appropriate standards for structures, systems and components which rely on the exclusion allowed by the Grimes to Walters letter.

RAI 2.3.3.14-3: Section 2.4.2.10 - Fire Rated Assemblies, states that fire dampers were evaluated in section 2.3.3.14 - Fire Protection. Although there is a reference to fire dampers in section 2.3.3.14 - Fire Protection, fire dampers are not listed in Table 3.4-14 - Fire Protection. Include fire dampers in the scope of license renewal, or justify this apparent discrepancy. Include fire dampers in the AMR, unless they are considered active components. If considered active, provide a basis for the damper housing (frame and sleeve for curtain damper or housing for butterfly type dampers) and fusible link being considered active components.

RAI 2.3.3.14-4: Section 2.3.3.14 - Fire Protection, states that Halon suppression systems will be considered in the LRA. The Halon suppression system for the Cable Spreading Room is required specifically by 10 CFR 50.48's reference to 10 CFR 50 Appendix R. Neither Halon suppression system components nor the Halon suppression system as a whole appears to be included in Tables 3.4-14 or 3.6-12. The components which appear to be missing from the table include, but are not limited to, Halon cylinders, Halon nozzles, nitrogen cylinders, Halon piping, pilot heads, pilot lines, pilot valve bodies, and auxiliaries. Include these components in the scope of license renewal. Also, discuss if these components should be subject to an AMR and provide justification for those components that are not subject to an AMR.

RAI 2.3.3.14-5: Section 2.1.1.4.1 Fire Protection Scoping states that the UFSAR, licensing correspondence, and design basis documents were used for scoping. The Turkey Point fire protection license condition includes the following NRC SERs by reference: March 21, 1979 (supplemented by letters dated April 3, 1980, July 9, 1980, December 8, 1980, January 26, 1981, May 10, 1982, March 27, 1984, April 16, 1984, August 12, 1987), February 25, 1994, February 24, 1998, October 8, 1998, December 22, 1998, May 4, 1999 and May 5, 1999. A sample review of the May 5, 1999, and the October 8, 1998, correspondence identified

Enclosure

structures, systems and components which are included in the licensing basis but could not be identified in the LRA as having fire protection functions. The examples identified were, curbs and ramps used as passive fire protection features, a checker plate walkway which would improve sprinkler performance, and gravel pits around transformers for flame arrestment and combustible liquid containment. Explain how the foregoing examples were considered in the scoping assessment, and describe the process to ensure that all structures, systems and components in the licensing basis for fire protection are included in the scope of license renewal.

RAI 2.3.3.14-6: Fire Protection Licence Renewal Boundary Drawing 0-FP-03, shows the fire water jockey pumps in the scope of license renewal. The pump casings are not included in the list of components identified in the scope of license renewal (Table 3.4-14). Clarify this apparent discrepancy between the drawings and the LRA.

RAI 2.3.3.14-7: Fire Protection License Renewal Boundary Drawing 0-FP-04 shows hose stations HS-AB-02 and HS-AB-03 as in scope of license renewal. Hose stations are not listed in Table 3.4-13 as scoped within license renewal. Although fire hoses may not be considered as requiring an AMR, hose racks may be of a variety of types and may require an AMR. Include hose station, including hose racks, in the LRA and in the AMR or provide a justification for their exclusion.

RAI 2.3.3.14-8: In accordance with 10 CFR Part 50.48, the fire hazard analysis identifies a Halon fire suppression system located in the Cable Spreading Room. To ensure that there are no breaches in supporting structures (walls, floors, ceilings, other barriers) that would lessen the design concentration of Halon available to suppress a fire, discuss if supporting structures which enclose 10 CFR Part 50.48 required total flooding areas are considered within the scope of license renewal and subject to an AMR. Provide justification to exclude them if they are not.

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