

August 31, 2001

Mr. J. A. Stall  
Senior Vice President, Nuclear and  
Chief Nuclear Officer  
Florida Power and Light Company  
P.O. Box 14000  
Juno Beach, Florida 33408-0420

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING THE  
10 CFR PART 50, APPENDIX R, EXEMPTION REQUEST K1 FOR THE  
ST. LUCIE PLANT, UNIT 1 (TAC NO. MB0300)

Dear Mr. Stall:

By letter dated October 4, 2000, Florida Power and Light Company (FPL) resubmitted Title 10, *Code of Federal Regulations*, Part 50, Appendix R, Exemption Request K1, which dealt with cable separation issues in the St. Lucie Unit 1 containment building. Supplemental risk-informed information was provided by letter dated June 28, 2001.

The U.S. Nuclear Regulatory Commission (NRC) staff reviewed your submittals and determined that additional information was needed to complete the review. This was discussed in a conference call on August 16, 2001, between the NRC and FPL. These discussions concluded that, given the state of the art with respect to risk-informed treatment of fire-induced spurious actuations, a risk-informed approach would not be appropriate at this time. The FPL staff indicated they could provide a plant-specific fire model, which would support a deterministic evaluation, and the NRC staff agreed to continue its evaluation using a deterministic approach if this information is submitted. The NRC staff identified additional information needed to support a deterministic evaluation, based upon review of the previous submittals. This is provided in the enclosed Request For Additional Information (RAI).

On August 27, 2001, Mr. Ken Frehafer of your staff agreed that a revised submittal, including response to the enclosed RAI, would be provided by November 30, 2001.

If you have any questions, please contact me at (301) 415-3974.

Sincerely,

**/RA by Kahtan N. Jabbour Acting for/**  
Brendan T. Moroney, Project Manager, Section 2  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-335

Enclosure: Request for Additional Information

cc w/encl: See next page

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Florida Power and Light Company

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REQUEST FOR ADDITIONAL INFORMATION  
10 CFR PART 50, APPENDIX R, EXEMPTION K1  
ST. LUCIE PLANT, UNIT 1  
DOCKET NO. 50-335

1. The original exemption dated February 21, 1985, addressed the entire containment annular region. Florida Power & Light has stated that corrective actions have been completed in several areas and an exemption is needed only for a segment of the containment annular region between columns 2 and 6 above and below the 45' elevation. Provide specific details of the area requiring the exemption.
2. The revised exemption dated March 5, 1987, indicated that there were "limited intervening combustibles" in the containment annular region. If there are any intervening combustibles in the area for which the exemption is sought, they should be included in the fire model.
3. Radiant exposure was listed as the only credible scenario. Can the set of cable trays on the lower elevation involve the cable trays in the same train on the upper elevation? Are there any other structures, systems or components important to safety, which could be in the plume?
4. Provide the basis for the assumption that solid enclosures of cable trays eliminates them as a fuel source.
5. The bench scale heat release rate uses an average of one type of non-rated cable and two types of rated cables. Is this representative of the amount of non-rated cable installed? Why not assume all non-rated cable to obtain bounding results?
6. What are the pass/fail criteria? What is the maximum credible length of cable in a cable tray that can be involved in a fire? How fast will a fire in a cable tray grow? Will a fire in cable tray risers grow faster than in horizontal cable trays, and how does it affect the analysis? What is the response time for the fire brigade to extinguish a fire in a containment cable tray at full power or following a plant trip?

**Enclosure**