

FEB 20 1992

Docket Nos.: 50-250, 50-251
License Nos.: DPR-31, DPR-41

Florida Power & Light Company
ATTN: Mr. J. H. Goldberg
President - Nuclear Division
Nuclear Energy Department
P. O. Box 14000
Juno Beach, Florida 33408-0420

Gentlemen:

SUBJECT: TEMPORARY WAIVER OF COMPLIANCE - TURKEY POINT UNIT 3

This letter confirms the telephone conversation between Mr. L. W. Pearce of your staff and Mr. R. C. Butcher of my staff on February 19, 1992, granting a Regional Waiver of Compliance for Turkey Point Unit 3. Our action was based on your written request letter dated February 19, 1992.

Technical Specification (TS) 3.6.1.3, "Containment Air Locks," requires that each containment air lock shall be operable during Modes 1, 2, 3, or 4. Action statement b. states: "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."

On February 18, 1992, during the performance of the TS 4.6.1.3.c required six month surveillance test on the interlock between the inner and outer air lock doors, personnel were able to crack open the inner door on the Unit 3 emergency escape hatch with the outer door closed and the interlock set to open the outer door. As a result, the containment emergency air lock was considered inoperable. You were unable to complete repairs within 24 hours, and requested a waiver of compliance from TS 3.6.1.3 for up to 72 hours. You expect to complete repair of the interlock within 24 hours.

As compensatory action until the air lock is repaired, you will station a dedicated operator 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. Your waiver request was reviewed by the Plant Nuclear Safety Committee and approved by the Plant General Manager.

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Prior to granting the temporary Waiver of Compliance, the technical issues and extent of the Waiver were reviewed. They were discussed in a telephone call among L. Reyes, E. Merschoff, M. Sinkule, and R. Butcher of RII; G. Lainas, H. Berkow, and G. Hubbard of NRR; and R. Grazio and L. W. Pearce of FP&L. This one-time Waiver of Compliance was granted for up to 72 hours based on the justification and compensatory measures documented in your request letter. If you have any questions concerning this letter, please contact us.

Sincerely,

(Original signed by L. Reyes)

Stewart D. Ebnetter
Regional Administrator

Enclosure:
FPL Letter (L-92-048) dtd
February 19, 1992

cc w/encl:
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(cc w/encl cont'd - See page 4)

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L-92-048

FEB 19 1992

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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Enclosure

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 Manger.

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

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