

JUN 4 1981

Docket No. 50-335

Dr. Robert E. Uhrig
Vice President
Advanced Systems & Technology
Florida Power & Light Company
P. O. Box 529100
Miami, Florida 33152

Dear Dr. Uhrig:

By letter dated March 19, 1981, you requested exemptions to 10 CFR §50, Appendix R, Sections III.A, G, J and O.

The exemption to Section III.A would remove the requirement to modify your fire pump controllers so that they meet all the criteria of NFPA-20, and the requirement to automatically load the fire pumps onto vital buses in the presence of a safeguards actuation. This request is based on your assertion that the design of the fire pump controllers and switchgear presently installed meets or exceeds the intent of NFPA-20. You further assert that such modifications would be detrimental to overall facility safety.

Part of the exemption to Section III.G would remove the requirements to install fire doors at six locations currently equipped with door and assembly units manufactured as flood barriers. You noted the fire barrier capability of the existing doors in asserting that substituting doors that conform with the requirements of Section III.G would not enhance fire protection safety at your facility.

Part of the exemption to Section III.G would remove the requirement to install fire-rated dampers in safety-related duct penetrations of the Auxiliary Building. This request is based on low levels of combustibles, ductwork fire protection capability, the potential for violating the radiological boundary of the Auxiliary Building and the potential for affecting operation of vital equipment. You assert that installation of the subject dampers would not significantly enhance fire protection and would reduce overall plant safety.

af
3

OFFICE ▶
SURNAME ▶
DATE ▶

We have found that your requests regarding Sections III.A (fire pump controllers and switch gear) and III.G (fire doors and dampers) provide sound technical bases warranting further staff review. The schedule requirements for these items are, therefore, suspended in accordance with 10 CFR 50.48(c)(6) until final Commission action on these requests.

With respect to your request not to install fire dampers in safety related ductwork of the Auxiliary Building, you are requested to:

1. list the safety-related duct penetrations of the Auxiliary Building in which you are requesting approval not to install dampers;
2. provide details supporting your conclusion that the radiological boundary of the Auxiliary Building could be violated; and
3. provide details supporting your conclusion that the operation of vital emergency safeguards equipment could be affected.

This information should be provided within 30 days of receipt of this letter.

Part of the exemption to Section III.G would remove the need to fully meet the requirements for fire protection of safe shutdown capability based on your assertion that the site-specific fire protection features and modifications, previously approved by the NRC staff in its St. Lucie Unit 1 fire protection Safety Evaluation Reports (SERs), provide an acceptable level of fire protection for the safe shutdown capability of St. Lucie Unit 1.

Your request for exemption from the requirements of Section III.G for those areas of the plant which have already been reviewed and approved by the Commission is denied. Such an exemption request must be based on a reexamination of those previously approved configurations that do not meet the requirements as specified in Section III.G. Based on this reexamination you must either meet the requirements of Section III.G of Appendix R or apply for an exemption that justifies alternatives by a fire hazard analysis. You have provided no such justification.

In your letter of March 19, 1981, you requested exemption from the schedule requirements of 10 CFR §50.48 Section C in the event that we deny your request for exemption to Appendix R, Section III.G. We are reviewing this schedule-related request.

OFFICE ▶
SURNAME ▶
DATE ▶

Mr. Robert Uhrig

The exemption to Section III.J would remove the requirement to provide adequate emergency lighting in any areas, not previously identified but subsequently found by the NRC staff to be necessary for operation of safe shutdown equipment, including access and egress routes. You assert that further modifying the emergency lighting system would not enhance fire protection at the facility.

We have found that your exemption request regarding emergency lighting does not adequately support your assertion that implementation of Section III.J would not enhance fire protection at your facility. Therefore, we deny your request for exemption from 10 CFR §50, Appendix R, Section III.J.

The exemption to Section III.O would remove the requirement to design the RCP oil collection system to withstand the containment environment associated with a LOCA. The Commission does not consider such a design criteria to be required by Section III.O and therefore the requested exemption is unnecessary.

Sincerely,

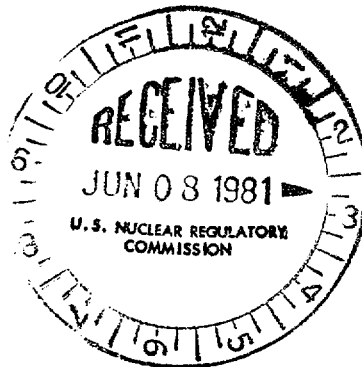
Original Signed by
H. R. Denton

Harold R. Denton, Director
Office of Nuclear Reactor Regulation

cc: See next page

DISTRIBUTION:

- Docket File
- Gray File
- NRC PDR RAClark
- L PDR PMKreutzer-3
- TERA CNelson
- NSIC TWambach
- ORB#3 Rdg VBenaroya
- DEisenhut TNovak
- OELD HDenton
- IE-3
- ACRS-10
- JHeltemes



CP
3

Handwritten initials 'UE' and '63'.

8106100 201

F

*See attached sheet for previous concurrence.

D: DE
DEisenhut
5/5/81

D: HRE
HDenton
6/2/81

OFFICE	ORB#3:DL*	ORB#3:DL	ORB#3:DL *	ORB#5:DL*	CEB:DE*	AD:OR:DL*	OELD*
SURNAME	PMKreutzer	CNelson/pn	RAClark	TWambach	VBenaroya	TNovak	SHields
DATE	5/1/81	5/3/81	5/ /81	5/4/81	5/5/81	5/5/81	5/26/81

Mr. Robert Uhrig

-3-

The exemption to Section III.J would remove the requirement to provide adequate emergency lighting in any areas, not previously identified but subsequently found by the NRC staff to be necessary for operation of safe shutdown equipment, including access and egress routes. You assert that further modifying the emergency lighting system would not enhance fire protection at the facility.

We have found that your exemption request regarding emergency lighting provides no technical basis warranting further staff review. Therefore, we deny your request for exemption from 10 CFR §50, Appendix R, Section III.J.

The exemption to Section III.O would remove the requirement to design the RCP oil collection system to withstand the containment environment associated with a LOCA. The Commission does not consider such a design criteria to be required by Section III.O and therefore the requested exemption is unnecessary.

Sincerely,

Harold R. Denton, Director
Office of Nuclear Reactor Regulation

cc: See next page

DISTRIBUTION:

Docket File	Gray File
NRC PDR	RAClark
L PDR	PMKreutzer (3)
NSIC	CNelson
TERA	Twambach
ORB#3 Rdg	VBenaroya
DEisenhut	TNovak
OELD	HDenton
I&E (3)	
ACRS (10)	
JHeltemes	

D:DL	D:NRR
DEisenhut	HDenton
5/ /81	5/ /81

*no legal objection
subject to comment
noted*

*See attached sheet for previous concurrence.

OFFICE	..ORB#3:DL*....	.ORB#3:DL*....	.ORB#3:DL.....	ORB#5:DL*....	.CEB:DE*.....	.AD:OR:DL*....	OELD
SURNAME	PMKreutzer	CNelson/pn	RAClark	Twambach	VBenaroya	TNovak	Shields
DATE	..5/..1/81.....	..5/..1/81.....	..5/.. /81.....	5/04/81.....	..5/05/81.....	..5/05/81.....	5/26/81

Mr. Robert Uhrig

-3-

The exemption to Section III.J would remove the requirement to provide adequate emergency lighting in any areas, not previously identified but subsequently found by the NRC staff to be, necessary for operation of safe shutdown equipment, including access and egress routes. You assert that further modifying the emergency lighting system would not enhance fire protection at the facility.

We have found that your exemption request regarding emergency lighting provides no technical basis that warrant further staff review. Therefore, we deny your request for exemption from 10 CFR §50, Appendix R, Section III.J.

The exemption to Section III.O would remove the requirement to design the RCP oil collection system to withstand the containment environment associated with a LOCA. The Commission does not consider such a design criteria to be required by Section III.O and therefore the requested exemption is unnecessary.

Sincerely,

Darrell G. Eisenhut, Director
Division of Licensing

DISTRIBUTION
Docket File
NRC PDR
L PDR
NSIC
TERA
ORB#3 Rdg
DEisenhut
OELD
I&E (3)
ACRS (10)
JHeletmes
Gray File
RAClark
PMKreutzer (3)
CNelson
TWambach
VBenaroya
TNovak
HDenton

D:DL D:NRR
DEisenhut HDenton
5/ /81 5/ /81

JVM **NSH PMS**

OFFICE ▶	ORB#3:DL	ORB#3:DL	ORB#3:DL	ORB#5:DL	CEB:DE	AD:DL	OELD
SURNAME ▶	PMKreutzer	CNelson	RAClark	TWambach	VBenaroya	TNovak	SHIELDS
DATE ▶	5/1/81	5/1/81	5/ /81	5/04/81	5/5/81	5/5/81	5/ /81



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

JUN 4 1981

Docket No. 50-335

Dr. Robert E. Uhrig
Vice President
Advanced Systems & Technology
Florida Power & Light Company
P. O. Box 529100
Miami, Florida 33152

Dear Dr. Uhrig:

By letter dated March 19, 1981, you requested exemptions to 10 CFR §50, Appendix R, Sections III.A, G, J and O.

The exemption to Section III.A would remove the requirement to modify your fire pump controllers so that they meet all the criteria of NFPA-20, and the requirement to automatically load the fire pumps onto vital buses in the presence of a safeguards actuation. This request is based on your assertion that the design of the fire pump controllers and switchgear presently installed meets or exceeds the intent of NFPA-20. You further assert that such modifications would be detrimental to overall facility safety.

Part of the exemption to Section III.G would remove the requirements to install fire doors at six locations currently equipped with door and assembly units manufactured as flood barriers. You noted the fire barrier capability of the existing doors in asserting that substituting doors that conform with the requirements of Section III.G would not enhance fire protection safety at your facility.

Part of the exemption to Section III.G would remove the requirement to install fire-rated dampers in safety-related duct penetrations of the Auxiliary Building. This request is based on low levels of combustibles, ductwork fire protection capability, the potential for violating the radiological boundary of the Auxiliary Building and the potential for affecting operation of vital equipment. You assert that installation of the subject dampers would not significantly enhance fire protection and would reduce overall plant safety.

We have found that your requests regarding Sections III.A (fire pump controllers and switch gear) and III.G (fire doors and dampers) provide sound technical bases warranting further staff review. The schedule requirements for these items are, therefore, suspended in accordance with 10 CFR 50.48(c)(6) until final Commission action on these requests.

With respect to your request not to install fire dampers in safety related ductwork of the Auxiliary Building, you are requested to:

1. list the safety-related duct penetrations of the Auxiliary Building in which you are requesting approval not to install dampers;
2. provide details supporting your conclusion that the radiological boundary of the Auxiliary Building could be violated; and
3. provide details supporting your conclusion that the operation of vital emergency safeguards equipment could be affected.

This information should be provided within 30 days of receipt of this letter.

Part of the exemption to Section III.G would remove the need to fully meet the requirements for fire protection of safe shutdown capability based on your assertion that the site-specific fire protection features and modifications, previously approved by the NRC staff in its St. Lucie Unit 1 fire protection Safety Evaluation Reports (SERs), provide an acceptable level of fire protection for the safe shutdown capability of St. Lucie Unit 1.

Your request for exemption from the requirements of Section III.G for those areas of the plant which have already been reviewed and approved by the Commission is denied. Such an exemption request must be based on a reexamination of those previously approved configurations that do not meet the requirements as specified in Section III.G. Based on this reexamination you must either meet the requirements of Section III.G of Appendix R or apply for an exemption that justifies alternatives by a fire hazard analysis. You have provided no such justification.

In your letter of March 19, 1981, you requested exemption from the schedule requirements of 10 CFR §50.48 Section C in the event that we deny your request for exemption to Appendix R, Section III.G. We are reviewing this schedule-related request.

Mr. Robert Uhrig

-3-

The exemption to Section III.J would remove the requirement to provide adequate emergency lighting in any areas, not previously identified but subsequently found by the NRC staff to be necessary for operation of safe shutdown equipment, including access and egress routes. You assert that further modifying the emergency lighting system would not enhance fire protection at the facility.

We have found that your exemption request regarding emergency lighting does not adequately support your assertion that implementation of Section III.J would not enhance fire protection at your facility. Therefore, we deny your request for exemption from 10 CFR §50, Appendix R, Section III.J.

The exemption to Section III.O would remove the requirement to design the RCP oil collection system to withstand the containment environment associated with a LOCA. The Commission does not consider such a design criteria to be required by Section III.O and therefore the requested exemption is unnecessary.

Sincerely,



Harold R. Denton, Director
Office of Nuclear Reactor Regulation

cc: See next page

Florida Power & Light Company

cc:

Robert Lowenstein, Esquire
Lowenstein, Newman, Reis & Alexrad
1025 Connecticut Avenue, N.W.
Washington, D. C. 20036

Norman A. Coll, Esquire
McCarthy, Steel, Hector & Davis
14th Floor, First National Bank Building
Miami Florida 33131

Indian River Junior College Library
3209 Virginia Avenue
Fort Pierce, Florida 33450

Administrator
Department of Environmental Regulation
Power Plant Siting Section
State of Florida
2600 Blair Stone Road
Tallahassee, Florida 32301

Mr. Weldon B. Lewis
County Administrator
St. Lucie County
2300 Virginia Avenue, Room 104
Fort Pierce, Florida 33450

Director, Criteria and Standards Division
Office of Radiation Programs (ANR-460)
U.S. Environmental Protection Agency
Washington, D. C. 20460

U.S. Environmental Protection Agency
Region IV Office
ATTN: EIS COORDINATOR
345 Courtland Street, N.E.
Atlanta, Georgia 30308

Mr. Charles B. Brinkman
Manager - Washington Nuclear Operations
C-E Power Systems
Combustion Engineering, Inc.
4853 Cordell Avenue, Suite A-1
Bethesda, Maryland 20014

Mr. Jack Schreve
Office of the Public Counsel
Room 4, Holland Building
Tallahassee, Florida 32304

Resident Inspector/St. Lucie
Nuclear Power Station
c/o U.S.N.R.C.
P. O. Box 400
Jensen Beach, Florida 33457

Bureau of Intergovernmental
Relations
660 Apalachee Parkway
Tallahassee, Florida 32304