



JAN 13 2006

L-2006-004  
10 CFR 50.12  
10 CFR 50.48  
10 CFR Part 50 Appendix R

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

Subject: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Response to Request for Additional Information  
Ref: Request for Exemption -  
Automatic Suppression in the Mechanical Equipment  
Room (Fire Zone 097) and Control Room Roof (106R)

By letters L-2004-176 and L-2005-089 dated December 27, 2004, and May 23, 2005, respectively, Florida Power & Light Company (FPL) requested, in accordance with the provisions of Title 10 Code of Federal Regulations Section 50.12 (10 CFR 50.12), an exemption from the requirements of 10 CFR Part 50 Appendix R Section III.G.3 for automatic suppression in the Mechanical Equipment Room (Fire Zone 097) and for suppression and detection in the subsection of the Control Building that contains the Control Room Roof (Fire Zone 106R) at Turkey Point.

On December 22, 2005, the NRC Staff requested additional information needed to complete the review of the exemption request. The attachment to this letter provides the additional information requested.

Please contact Walter Parker at (305) 246-6632, if there are any questions.

Very truly yours,

A handwritten signature in black ink that reads "Terry Jones".

Terry O. Jones  
Vice President  
Turkey Point Nuclear Plant

OIH

Attachment

cc: Regional Administrator, Region II, USNRC  
Senior Resident Inspector, USNRC, Turkey Point

ADD6

ATTACHMENT TO  
L-2006-004

Response To Request For Additional Information  
Regarding Exemption Request For Turkey Point Units 3 And 4:  
Exemption From The Automatic Suppression Requirement For The Mechanical Equipment  
Room (Fire Zone 097) And Control Room Roof (106R)

**1. Identify the fire barrier material used in each of the fire zones for which the exemption is requested.**

Fire Zones 097 and 106R are described in Turkey Point Units 3 & 4 UFSAR Appendix 9.6A, Subsection 4.MM.

Fire Zone 097 is an indoor zone. The floor, ceiling, west and south walls are reinforced concrete. The north and east walls are concrete masonry unit (CMU) construction. Non-grouted penetrants are sealed using fire-resistant elastomer or caulk seal materials with a 3-hour fire rating or are evaluated to provide an equivalent fire resistance.

Fire Zone 106R is an outdoor zone with no walls or ceiling. The floor consists of Houdaille spans with tar and gravel overlay. The roofing system has been evaluated as equivalent to Class A construction and has been reviewed by NRC as documented by NRC letter dated May 4, 1999.

**2. A 100-foot fire hose located outside the Cable Spreading Room is used as the secondary means of fire protection for the Mechanical Equipment Room (Fire Zone 097). In order to assess the accessibility of the hose to all points in the Mechanical Equipment Room, provide distances from the hose station, along the path that would be taken to reach the Mechanical Equipment Room in the event of a fire, to all points in the Mechanical Equipment Room.**

Using this hose, a stream can be applied on any component in the Mechanical Equipment Room. The travel distance from hose station HS-04-03 to the southwest corner of the room is approximately 75 feet. To place a nozzle at the furthest application (south side of the normal outside air intake), the hose could be extended southward along the east wall, westward along the south wall then northward along the west wall. The total distance is approximately 85 feet.

**3. Provide the following information regarding the detection system proposed for the Mechanical Equipment Room (FZ 097),**

**1. What type of detection system will be used?**

The additional detectors will be ionization-type and installed with alarm capability in the Main Control Room.

**2. Is the air flow within the room turbulent such that smoke detection could be compromised by inadequate placement of the detector(s)?**

No. The detectors will be mounted outside of direct, forced-air flow paths.

**3. What version of National Fire Protection Association standard NFPA 72 is referenced for the design and installation standard for the detector(s)?**

New detection facilities will be to the 2002 Edition of NFPA 72 or latest version in effect at the time of purchase and installation. Interface with existing detection and signaling circuitry and facilities will be per the applicable code of record.