



June 16, 2006

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

L-2006-121
10CFR 20.1703(b)

RE: Florida Power and Light Company
St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251

FPL Energy Seabrook, LLC
Seabrook Station
Docket No. 50-443

FPL Energy Duane Arnold, LLC
Duane Arnold Energy Center
Docket No. 50-331

**Request for Use of Delta Protection Respiratory Protection Equipment
Delta Protection's Self Fed Single Use "Mururoa BLU" Suit Systems**

Pursuant to the provision of 10 CFR 20.1703, "Use of individual respiratory protection equipment," Florida Power and Light Company (FPL), the licensee for the St. Lucie Nuclear Plant, Units 1 and 2, and the Turkey Point Nuclear Plant, Units 3 and 4; FPL Energy Seabrook, LLC (FPL Energy Seabrook) the licensee for Seabrook Station; and FPL Energy Duane Arnold, LLC (FPL Energy Duane Arnold), the licensee for Duane Arnold Energy Center (hereafter referred to collectively as FPL), hereby request authorization to use Delta Protection Mururoa BLU single use respiratory protection encapsulating suit systems.

Specifically, FPL has identified the Delta Protection Mururoa BLU suit systems as having benefits from a contamination control, heat stress reduction, and respiratory protection point of view. These suits have no National Institute for Safety and Health (NIOSH) approval for use as a respirator in the United States. Pursuant to 10 CFR 20.1703(b), FPL must request authorization for use of equipment that has not been tested or certified by NIOSH. Accordingly, FPL is requesting authorization for their use as respiratory protection equipment, with an Assigned Protection Factor (APF) of 2,000.

Approval of the request would improve worker safety in areas of airborne radioactivity and high potential for facial/skin contamination. In addition, the fact that the unit will supply full body air flow cooling within the suit as well as eliminate the need to establish an air distribution network at the work site will save time and overall exposure. We anticipate outage time savings, as well as the reduction of personal contamination events. The full body cooling effect will help us eliminate concerns that have come up in the past regarding heat stress. In summary, the suit systems will aid in achieving worker doses as low as reasonably achievable (ALARA).

By letter dated October 27, 2005, Delta Protection/Bacou Dalloz submitted Topical Report (TR) MURUBLU05NP, "Topical Report for Delta Protection Mururoa BLU Suit Systems," to the U.S. Nuclear Regulatory Commission (NRC) staff for review. By letter dated April 10, 2006, the NRC issued a final safety evaluation for Delta Protection/Bacou Dalloz Topical Report (TR) MURUBLU05NP, "Topical Report for Delta Protection Mururoa BLU Suit Systems." These documents can be located in ADAMS under Accession Numbers ML053060380 and ML060950499, respectively. As described in the NRC safety evaluation, the NRC staff has found that TR MURUBLU05NP is acceptable for referencing in licensing applications for respiratory protective equipment designed for reactors to the extent specified and under the limitations delineated in the TR and in the April 10, 2006, NRC safety evaluation.

Florida Power and Light Company, FPL Energy Seabrook, and FPL Energy Duane Arnold propose to use the Mururoa BLU (PVC or Ethyfuge) protective suit systems, as a respiratory protection device with an APF of 2,000, against airborne particulate contamination, consistent with the following configuration and conditions of use delineated in the TR and in the April 10, 2006, NRC safety evaluation:

1. Mururoa BLU one-piece encapsulating suit (of either PVC or Ethyfuge construction), fitted with 1) a Micronel C500X-012EK-AB60 blower with a C501A-012AK-A battery (consistent with the parts list in Section 7 of Attachment 6.6.6 to TR MURUBLU05NP) and 2) four Scott FP 10 P3, or four Delta Protection P3, high efficiency particulate filter cartridges. All four filter cartridges must be matching and replaced as a set.
2. Procedures for use of the suit systems are integrated into the respiratory programs required by Subpart H of 10 CFR Part 20. Fit testing of user is not applicable to fully encapsulating suits. Prior to use, wearers are trained on these conditions of use as well as the emergency escape features of the suits.
3. Suits are used in accordance with recommendations in Attachments 6.6.4, 6.6.5, and 6.6.6 of TR MURUBLU05NP.
4. Suit enclosures are single use only, and are discarded after use. Unused suit enclosures are stored in their original manufacturer's packing (in an environment not colder than 32 deg. F, nor hotter than 140 deg. F), with a maximum storage shelf-life of 3 years. Suits are not to come in contact with anything colder than 41 deg. F, nor hotter than 140 deg. F, during use.
5. Suits are donned with a fully charged battery pack installed on the blower. The maximum period of use (timed from a fully charged battery), is 4 hours with the blower set at 600 l/min, and 7 hours with the blower at the 400 l/min setting.
6. Suits are used only in atmospheres containing specific contaminants in concentrations that are not immediately dangerous to life or health (IDLH), as given in NIOSH "Concept for Industrial Power, Air-purifying Respiratory Standard," Draft for Comment, May 30, 2005, and have an oxygen content of at least 19.5 percent by volume.
7. Communication channels will be established with the supplier to report any defects, if experienced, with the device, and ensure that any manufacturer's notifications concerning the suit systems are received in a timely manner.

Based upon the above configuration and conditions, FPL has identified the following respiratory protection program elements and controls associated with approval of this authorization request.

1. Prior to use, the Mururoa BLU self fed suits will be integrated into FPL respiratory protection programs, using the information provided by the manufacturer.
2. Prior to use, new lesson plans will be developed to train workers on Mururoa BLU's features, donning, use and removal, cautions and use of mouth strips and tear off strips for routine and emergency egress.
3. Prior to use, Health Physics personnel will be provided additional training for selection, approval, issue, equipment set-up, operation and maintenance instructions for the Mururoa BLU suits.
4. Mururoa BLU self fed suits will not be used in IDLH environments.

The Mururoa BLU suit's safety features, namely the tear-off mouth strip and the emergency tear-off strip, make it unnecessary for any standby rescue person. Workers wearing suits are typically provided with radiological protection (RP) coverage (closed-circuit television or on scene RP coverage, and continuous audio communication). This communication/coverage adds to the assistance available to the suit wearer, if needed. Due to the design features of the suit, coupled with required training of all suit users on escape methods, and limiting the use of the suits to non-IDLH atmospheres, the requirements for standby rescue persons in 10 CFR 20.1703(f) is not applicable.

Florida Power and Light Company would like to begin using the Mururoa BLU suits during the October 2006, Turkey Point Unit 4 refueling outage. Therefore, FPL is requesting the subject authorization by September 1, 2006.

If you have any questions, please contact Joe Danek at (561) 694-4213.

Sincerely yours,



J. A. Stall
Senior Vice President, Nuclear and
Chief Nuclear Officer

cc: Regional Administrator, Region I
Regional Administrator, Region II
Regional Administrator, Region III
USNRC Project Manager, St. Lucie and Turkey Point
USNRC Project Manager, Seabrook Station
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