

NRR-PMDAPEm Resource

From: Paige, Jason
Sent: Tuesday, September 11, 2012 12:18 PM
To: Tomonto, Bob
Cc: Cross, William
Subject: Acceptance Review Regarding Turkey Point Units 3 and 4 NFPA-805 License Amendment Request

Dear Mr. Tomonto:

By letter dated June 28, 2012, Florida Power and Light Company (FPL) submitted a license amendment request for Turkey Point, Units 3 and 4 (Turkey Point). The proposed amendment would transition the fire protection licensing basis at Turkey Point, to Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.48(c), National Fire Protection Association Standard NFPA 805.

The purpose of this email is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this amendment. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Consistent with 10 CFR 50.90, an amendment to the license (including the technical specifications) must fully describe the changes requested, and following as far as applicable, the form prescribed for original applications. Section 50.34 of 10 CFR addresses the content of technical information required. This section stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations.

The NRC staff has reviewed your application and concluded that the information delineated below is necessary to enable the NRC staff to make an independent assessment regarding the acceptability of the proposed amendment request in terms of regulatory requirements and the protection of public health and safety and the environment.

In order to make the application complete, the NRC staff requests that FPL supplement the application to address the information requested below by September 19, 2012. This will enable the NRC staff to complete its detailed technical review. If the information responsive to the NRC staff's request is not received by the above date, the application will not be accepted for review pursuant to 10 CFR 2.101, and the NRC staff will cease its review activities associated with the application. If the application is subsequently accepted for review, you will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

The information requested and associated timeframe in this email were discussed with FPL on September 5, 2012. If you have any questions, please contact me at (301) 415-5888 or at Jason.Paige@nrc.gov.

Jason Paige, Turkey Point Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Phone: (301) 415-5888

Requested Supplemental Information

- (1) Florida Light and Power Company's review against the criteria in NEI 00-01 Section 3.2.1.2, Fire Damage to Mechanical Components, states that brazed components were assumed not to fail as a result of a fire in this analysis. This is contrary to the NEI 00-01 guidance. Provide justification for this assumption by discussing the extent of use of brazed components at Turkey Point and the significance of this assumption to the analysis results.
- (2) Attachment V describes a UAM regarding electrical panel factors and provides the results of a sensitivity analysis against a NUREG/CR-6850 method as being an increase in CDF/LERF of 15 to 35% for affected fire zones. The NRC's position on this method is explained in a June 21, 2012 letter to NEI (ML12171A583). Please use an NRC accepted method which removes the panel factors and provide revised results for affected aspects of the application (CDF, LERF, Δ CDF, Δ LERF).
- (3) Several of the Findings from the 2010 peer review F&Os identified in Table V-3 identified deviations from NUREG/CR-6850 (e.g., Finding 1-28 regarding propagation of fires outside of electrical cabinets, Finding 3-10 regarding use of lower HRRs for transient fires, and Finding 10-22 regarding "qualitative" disposition of sensitive electronics). Table V-3 subsequently dispositions these items as "This F&O has been closed. The action taken to address this item was specifically included in the focused-scope Peer Review." This response does not provide any information about how the item is currently addressed in your fire PRA. Please describe how the item was dispositioned and, for those F&O's that identify a deviation from NRC accepted methods that has been retained, provide a sensitivity evaluation (total and Δ CDF/LERF) replacing the method with an accepted method.
- (4) The impact on the PRA results of implementing incipient detection (very early warning fire detection system - VEWFDs) in the Main Control Room is presented in Attachment W as a risk reduction of about $7E-4$ /yr for CDF and $1E-04$ /yr for LERF, which implies current risk levels at or above these values. How was this risk reduction calculated? If the licensee determines that these results are correctly presented, please describe what additional compensatory actions have been implemented to lower the risks to acceptable ranges prior to the installation of the incipient detection system.

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Amendment Request
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From: Paige, Jason

Created By: Jason.Paige@nrc.gov

Recipients:
"Cross, William" <WILLIAM.CROSS@fpl.com>
Tracking Status: None
"Tomonto, Bob" <Bob.Tomonto@fpl.com>
Tracking Status: None

Post Office:

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Options
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Return Notification: No
Reply Requested: No
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