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 AUTH. NAME      AUTHOR AFFILIATION  
 UHRIG, R.E.      Florida Power & Light Co.  
 RECIP. NAME      RECIPIENT AFFILIATION  
 EISENHUT, D.G.      Division of Licensing

SUBJECT: Forwards response to Question 410,52 re fire protection requirements.

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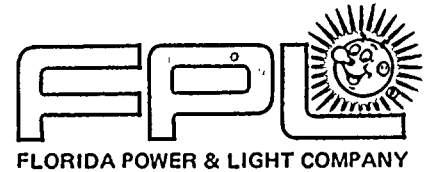
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October 7, 1982  
L-82-433

Office of Nuclear Reactor Regulations  
Attention: Mr. Darrell G. Eisenhut, Director  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Eisenhut:

Re: St. Lucie Unit No. 2  
Docket No. 50-389  
Fire Protection - Response to Question 410.52

Attached please find Florida Power and Light Company's (FPL) response to Question No. 410.52 requesting additional information on St. Lucie Unit No. 2 fire protection requirements. If you have any questions on this submittal, please contact us accordingly.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Robert E. Uhrig", is written over the typed name.

Robert E. Uhrig  
Vice President  
Advanced Systems and Technology

REU/RJS/JES/jea

Attachment

cc: J. P. O'Reilly, Region II  
Harold F. Reis, Esquire

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Question No.

410.52

The applicant provided a brief description of the methodology used to review the plant against the requirements of Appendix "R" as a response to CMEB Question 280.25 dated March 1982. In a meeting with the applicant May 1982, the applicant committed to define "fire areas" as "fire zones" and defined "fire areas" to be in accordance with Appendix "R". It is therefore not clear whether the response to CMEB 280.25 is still correct. The applicant also provided and expanded discussion of the methodology used to verify compliance with Appendix "R" by means of telecons but has not documented this expanded discussion. Therefore the applicant should 1) verify that the response to CMEB 280.25 is still appropriate, 2) verify that a fire is assumed to destroy all equipment/cables within a fire area and 3) discuss the methods used to identify which cables or pieces of equipment must be protected or relocated.

Response

410.52

As outlined in the response to CMEB question 280.25 a safe shutdown analysis was performed in order to insure that no single fire can prevent St Lucie Unit 2 from achieving a safe cold shutdown. This was done by compiling a list by fire area of all equipment, power sources and cables required to bring the plant to cold shutdown. The analysis conservatively assumed that all equipment and cables within a single fire area that are not protected were destroyed. A fire area is defined as any region that is completely enclosed (floors, walls & ceilings) by barriers that have a three hour fire rating. This includes three hour rated fire seals for all barrier penetrations (Note that in certain cases deviations from this requirement were requested in FP&L Letter L-82-282). The areas used in this analysis can be found in Items 1 and 2 of FP&L Letter L-82-282, dated July 14, 1982. In a number of cases the analysis indicated that both redundant means of performing safe shutdown functions could be impaired. In these instances the vital equipment and/or cables associated with one redundant train of these vital functions were either relocated or protected to assure that cold shutdown could be safely achieved. The cables that required relocation or protection were identified in Item 1 of the above referenced letter. Thus, the response to CMEB question 280.25, which stated that no single fire can prevent the plant from being brought safely to cold shutdown, is still applicable.