

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8304280063      DOC. DATE: 83/04/25      NOTARIZED: NO  
 FACIL: 50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co.  
 AUTH. NAME      AUTHOR AFFILIATION  
 UHRIG, R. E.      Florida Power & Light Co.  
 RECIP. NAME      RECIPIENT AFFILIATION  
 EISENHUT, D. G.      Division of Licensing

DOCKET #  
05000335

SUBJECT: Forwards Suppl 1 to 830412 request for exemption from Section III-0 of App R requirements re reactor coolant pumps in fire protection sys,

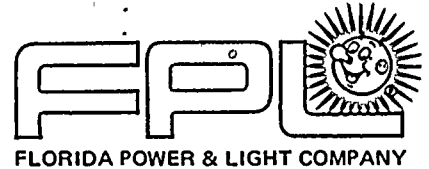
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	IE/WHITNEY, L		1	1	NRR FIORAVANT07		2	2
	NRR WAMBACH		1	0	NRR/DE/CFB	09	2	2
	NRR/DL DIR		1	1	<u>REG FILE</u>	04	1	1
	RGN2		1	1				
EXTERNAL:	ACRS	11	3	3	LPDR	03	1	1
	NRC PDR	02	1	1	NSIC	05	1	1
	NTIS		1	1				

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2	2	2	2	2	2
3	3	3	3	3	3
4	4	4	4	4	4
5	5	5	5	5	5
6	6	6	6	6	6
7	7	7	7	7	7
8	8	8	8	8	8
9	9	9	9	9	9
10	10	10	10	10	10
11	11	11	11	11	11
12	12	12	12	12	12



April 25, 1983  
L-83-261

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 1  
DOCKET NO. 50-335  
APPENDIX R, FIRE PROTECTION

In a letter dated April 12, 1983 (L-83-227), Florida Power & Light Co. (FPL) submitted a fire protection submittal for St. Lucie Unit No. 1.

Please find attached, Supplement 1 to this submittal which requests an exemption from Section III-0 of Appendix R.

Should you have any questions concerning this submittal, please do not hesitate to contact us.

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/PPC/rms

Attachment

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

A006

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ATTACHMENT

EXEMPTION K2

An exemption is requested from Section III-0 of Appendix R because the Oil Collection System is not capable of collecting lube oil from all four of the reactor coolant pump lube oil systems.

EVALUATION K2

1. Per design specifications, components inside containment have a maximum allowable surface temperature during normal operation of 150°F, thus reducing the probability of starting a fire.

Oil used:

Flash Point - 450°F  
Fire Point - 480°F  
Ignition Point - 530°F

2. The RCP oil collection system is required to be Seismic Category II per R.G. 1.29, paragraph C.2.
3. A design basis accident and a fire are not postulated to occur simultaneously.
4. Under normal operating conditions, it would be impractical to assume that all RCP oil systems would fail at once. Therefore, a tank to contain all RCP oil is not necessary.
5. Each RCP oil system has an alarm which will sound in the control room if approximately 15 gallons of oil is lost from the oil system. This alarm requires operator action.
6. NRC response, March 21, 1979; SER, required the following:

Reactor Coolant Pumps

We have requested that an oil collection system be provided for each of the reactor coolant pumps. The licensee has deferred action on this recommendation pending the final resolution of an EPRI study, "Evaluation and Test of Improved Fire Resistant Fluid Lubricants for Water Reactor Coolant Pump Motors." If a suitable lubricant is not found, the licensee will provide a system to suppress potential fires or provide for the removal of potential oil leakage to a safe location by December 1980. No additional information is required from the licensee (5.10).

This requires only for the removal of potential oil leakage and only to a safe location.

7. The RCP oil collection tank is capable of holding 225 gallons which exceeds the total capacity of one pump (190 gal.) plus reasonable leakage from the remaining pumps.

Conclusion K2

Based on our evaluation, the existing RCP oil collection system provides adequate capability for collecting lube oil from all potential pressurized and unpressurized leakage sites in the reactor coolant pump lube oil systems.

Additional modifications would not augment or materially enhance the safety of the plant since it would not aid in the prevention of fire damage to redundant components essential for safe shutdown. Therefore, we conclude; this is an acceptable exemption to Appendix R to 10 CFR 50, Section III.O.

