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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: Provides info on util position on outstanding fire protection issues.

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FPL

FLORIDA POWER & LIGHT COMPANY

August 24, 1983
L-83-458

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. 1
DOCKET NO. 50-335
FIRE PROTECTION

REF.
(a) NRC Letter dated 11/23/80
(b) FPL Letter No. L-81-48 dated 02/11/81
(c) FPL Letter No. L-81-122 dated 03/19/81
(d) NRC Letter dated 01/14/83
(e) FPL Letter No. L-83-227 dated 04/12/83
(f) FPL Letter No. L-83-261 dated 04/25/83

In an effort to resolve any potential misunderstandings, information is provided below regarding FPL's position on outstanding fire protection issues. Schedular commitments/requirements are not discussed.

In the submittal of June 10, 1982, FPL had evaluated fire protection from a "design basis fire" approach rather than a "protection features" approach. Upon recognition that the design basis approach would not fully satify NRC review requirements, FPL conducted an extensive re-evaluation of all fire areas in the plant. The re-evaluation was submitted April 12, 1983 and completely supersedes the June 10, 1982 fire protection report.

On November 24, 1980, the NRC sent FPL a generic letter (Reference (a)) outlining the fire protection issues considered "open" for NRC review. These issues consisted of:

(1) items identified as outstanding in the fire protection SER, dated August 17, 1979 and,
(2) subsections III.G, III.J, and III.O of 10CFR50 App. R.

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The following discussion summarizes FPL's position on these issues and references the applicable correspondence.

SER 3.1.4 UPGRADE EXISTING FIRE PUMPS

In order to meet 10CFR50 Appendix R Subsection III.A, the NRC required that FPL:

1. replace both existing fire pump controllers with new controllers approved by U.L. and meeting all the requirements of NFPA-20;

2. power each fire pump from a separate emergency diesel generator; and,

3. reroute cables for electric motor driven fire pumps throughout the plant as necessary, such that cables for redundant pumps are not located in the same fire area.

FPL requested an exemption from the requirements of item 1 in Reference (c). Reference (b) provides our position on item 2. For item 3, the fire pumps are included on the essential equipment list (see Reference (e)). As such, all cables in fire areas containing redundant safe shutdown equipment/cables will be protected per Subsection III.G.

Based upon the review afforded in Reference (d), and the information provided above, FPL considers this issue closed.

SER 3.6 FIRE DOOR EVALUATION

To meet the requirements of 10CFR50, Appendix R, Subsection III.G, and the recommendations of Section D.1(j) of Appendix A to BTP APCSB 9.5-1, the NRC has required that FPL protect door openings in all fire barriers enclosing safety-related fire areas with doors, frames and hardware that have been approved by a nationally recognized testing laboratory. The fire ratings for such fire door installations shall be equivalent to that required for the barrier up to a maximum of a three-hour rating.

In Reference (c) FPL committed to install 26 approved fire door assemblies throughout the plant. This commitment was based on previously determined fire areas. These fire areas were changed in our revised fire protection submittal, Reference (e), and as such some door locations have changed. FPL fully intends to comply with NRC requirements for protection of door openings in all fire barriers enclosing safety-related fire areas.

FPL considers the exemption requests in Reference (e) for water tight doors a formality since the staff had previously approved this exemption in the draft Safety Evaluation, (Reference (d)).

SER 3.6 is considered closed and these issues will be tracked under the 10CFR50 Appendix R Section III.G issue.

SER 3.7 VENTILATION DUCT PENETRATIONS

To meet the requirements of 10CFR50 Appendix R Subsection III.G and the recommendations of Section D.1(j) of Appendix A to BTP APCSB 9.5-1, the NRC has required FPL to protect penetrations for ventilation systems, in all fire barriers enclosing safety-related fire areas, by fire dampers and associated hardware that have been tested and approved by a nationally recognized testing laboratory. The fire rating for such fire damper installations shall be equivalent to that required by the barrier up to a maximum rating of three hours.

Since Reference (e) fully addresses this issue, FPL intends to track resolution of this item under the 10CFR50 Appendix R Subsection III.G issue. Therefore SER 3.7 is considered closed.

SER 3.9 CABLE SPREADING ROOM - FIRE BARRIER

To meet the requirements of 10CFR50, Appendix R, Subsection III.G FPL is required to close the 18 x 20 foot opening between the Train "B" switchgear room and the cable spreading room with construction that has been successfully tested in accordance with ASTM, E-119 by a nationally recognized testing laboratory for 1½ hours.

Reference (e) takes no exception to three hour fire barrier separation in these areas. FPL intends to construct a three hour fire barrier in place of the present 1½ hour fire barrier. SER 3.9 is considered closed.

SER 3.12.7 SMOKE DETECTORS

To meet the requirements of 10CFR50, Appendix R, Subsection III.F, FPL is required to install automatic fire detection systems in the following areas: (1) Low Pressure Safety Injection Pumps, (2) High Pressure Safety Injection Pumps, and (3) Containment Spray Pumps. These detection systems should be capable of operation with or without offsite power.

In Reference (b) FPL provided information indicating compliance with NRC requirements. Based on the favorable staff review contained in Reference (d), FPL considers this item closed.

SER 3.13.3 REACTOR COOLANT PUMP LUBE OIL COLLECTION SYSTEM

The NRC has required that FPL provide an oil containment and collection system which meets the requirements of 10CFR50, Appendix R, Subsection III.O.

References (b) and (c) provided the design criteria for the Reactor Coolant Pump Oil Collection System. The draft Safety Evaluation, Reference (d), accepted this design and closed the item.

Subsequent discussions with your staff indicated the need to submit a request for exemption since the oil collection tank is not capable of holding the entire lube oil system inventory. FPL considers the exemption request (Reference (f)) a formality since the system design was accepted in Reference (d). SER 3.13.3 is considered closed, and the exemption request will be tracked under the 10CFR50 Appendix R III.O issue.

SER 4.1 SAFE SHUTDOWN SYSTEM

FPL should protect redundant cables in accordance with 10CFR50, Appendix R, Subsection III.G. Alternate Shutdown capability should be provided when safe shutdown cannot be ensured by barriers and detection and suppression systems because of the exposure of redundant safe shutdown equipment, cabling, or components in a single fire area, to an exposure fire, or fire suppression activities or rupture or inadequate operation of fire suppression systems. The alternate shutdown system should meet the requirements of 10CFR50, Appendix R, Subsection III.L.

Reference (e) fully addresses the III.G, portion of this issue. III.L will be addressed in a future submittal. Since both these items are entirely covered by 10CFR50 Appendix R Subsections III.G and III.L, FPL considers SER 4.1 closed.

SER 6.0 FIRE BRIGADE SIZE AND TRAINING

The NRC has required that FPL meet the requirements of 10CFR50, Appendix R, Subsection III.H & I regarding fire brigade size and training.

By References (b) and (c), FPL committed to comply with the requirements of Subsections III.H & I. Based upon the favorable staff review as indicated in Reference (d), FPL considers this item closed.

10CFR50 APPENDIX R, III.G
FIRE PROTECTION OF SAFE SHUTDOWN CAPABILITY

The Commission's regulations, 10CFR50.48 require FPL to comply with Subsection III.G of Appendix R regardless of previous staff acceptance of alternative proposals.

The issue is fully addressed in the revised fire protection submittal, Reference (e), and is considered open pending staff review.

10CFR50 APPENDIX R, III.J EMERGENCY LIGHTING

The Commission's regulations, 10CFR50.48 require FPL to comply with Subsection III.J of Appendix R regardless of previous staff acceptance of alternative proposals.

FPL conducted a study to identify essential equipment that could potentially require local manual operation to achieve cold shutdown conditions. The local area surrounding the equipment, along with the access and egress routes, have been identified and provided with emergency lighting as required by Subsection III.J (except as discussed below).

An exemption from the emergency lighting requirements in the containment area was requested in Reference (c). The draft Safety Evaluation, Reference (d), has recommended that this exemption be granted.

FPL considers this item open pending staff review of emergency lighting placement and granting of the aforementioned exemption request.

10CFR50, APPENDIX R, III.O OIL COLLECTION SYSTEM FOR REACTOR COOLANT PUMP

The Commission's regulations, 10CFR50.48, require FPL to comply with Subsection III.0 of Appendix R regardless of previous staff acceptance of alternative proposals.

As discussed under SER 3.13.3 FPL considers this item open pending formal staff approval of the exemption requested in Reference (f).

If additional questions arise, please feel free to call.

Very truly yours,

Robert E. Uhrig
Vice President
Advanced Systems and Technology

REU/CLF/GJK/mrl

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