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EISENHUT,D.G. Division of Licensing

SUBJECT: Forwards Rev 4 to fire hazard analysis,NRC audit scheduled for Feb 1985,Formal disposition of exemption requests required by second wk of Jan 1985.

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FLORIDA POWER & LIGHT COMPANY

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L-84-390

Office of Nuclear Reactor Regulation
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
FIRE PROTECTION

Attached is Revision 4 to the Fire Hazard Analysis for St. Lucie Unit 1. Please replace the previous page 31 with the revised page attached. The change is identified by a revision bar in the margin.

The Nuclear Regulatory Commission audit is presently scheduled for February, 1985. Resolution of these exemptions will be an integral part of the audit. Florida Power & Light requests that the Nuclear Regulatory Commission provide formal disposition of all the exemption requests by the second week in January, 1985.

Your cooperation in this effort would be greatly appreciated.

Should you have any questions regarding this submittal, please advise.

Very truly yours,

J.W. Williams, Jr.
Group Vice President
Nuclear Energy Department

JWW/SJR/mp
Attachment

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

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6) Two of the three 48 inch valves in the HVAC containment purge make-up pipe are operated from the "A" train and the other (annulus) valve from the "B" train. Two of the three 48 inch valves in the HVAC containment purge exhaust pipe are operated from the "B" train and the other (annulus) from the "A" train. Cable routing is such that a single fire in the containment, or a fire in either the Containment Purge Room or in the RAB HVAC Equipment Room cannot cause spurious opening of all three valves. In addition, these valves fail closed. R3

7) All of the aforementioned 2-inch valves are locked closed and are local manual operated.

Conclusion K5

Based on our evaluation, the existing fire barrier provides adequate separation. The installation of rated fire dampers in the 48 inch and 2 inch piping would not augment or materially enhance the safety of the plant, since it would not further aid in preventing the fire migration between Fire Area "K" and "E". Therefore we conclude this is an acceptable exemption to Appendix R to 10CFR50 Section III-G.2.a.

Exemption K6

An exemption is requested from section III.J of Appendix R for emergency lighting in containment because emergency lighting units with eight hour batteries are not provided in this area.

Evaluation K6

1) Valves required for shutdown cooling are the only items in containment which could potentially require operator action in the event of fire.

2) Manual operation of the shutdown cooling valves will not be needed for several hours after a fire.

3) Normal and Normal/Emergency lighting exists in containment.

4) Normal lighting can be manually energized in the event of loss of offsite power.

5) Four dedicated portable emergency lighting units are provided outside containment. R4

6) High containment temperatures would have a detrimental effect on battery supplies and their reliability.

Conclusion K6

Based on our evaluation, the existing emergency lighting systems with the portable units as a backup provide adequate capability for access, egress, and valve manipulation as required.

Additional modifications would not augment or materially enhance the safety of the plant since they would not aid in the capability to achieve safe shutdown. Therefore, we conclude, this is an acceptable exemption from Appendix R to 10 CFR 50, Section III.J.