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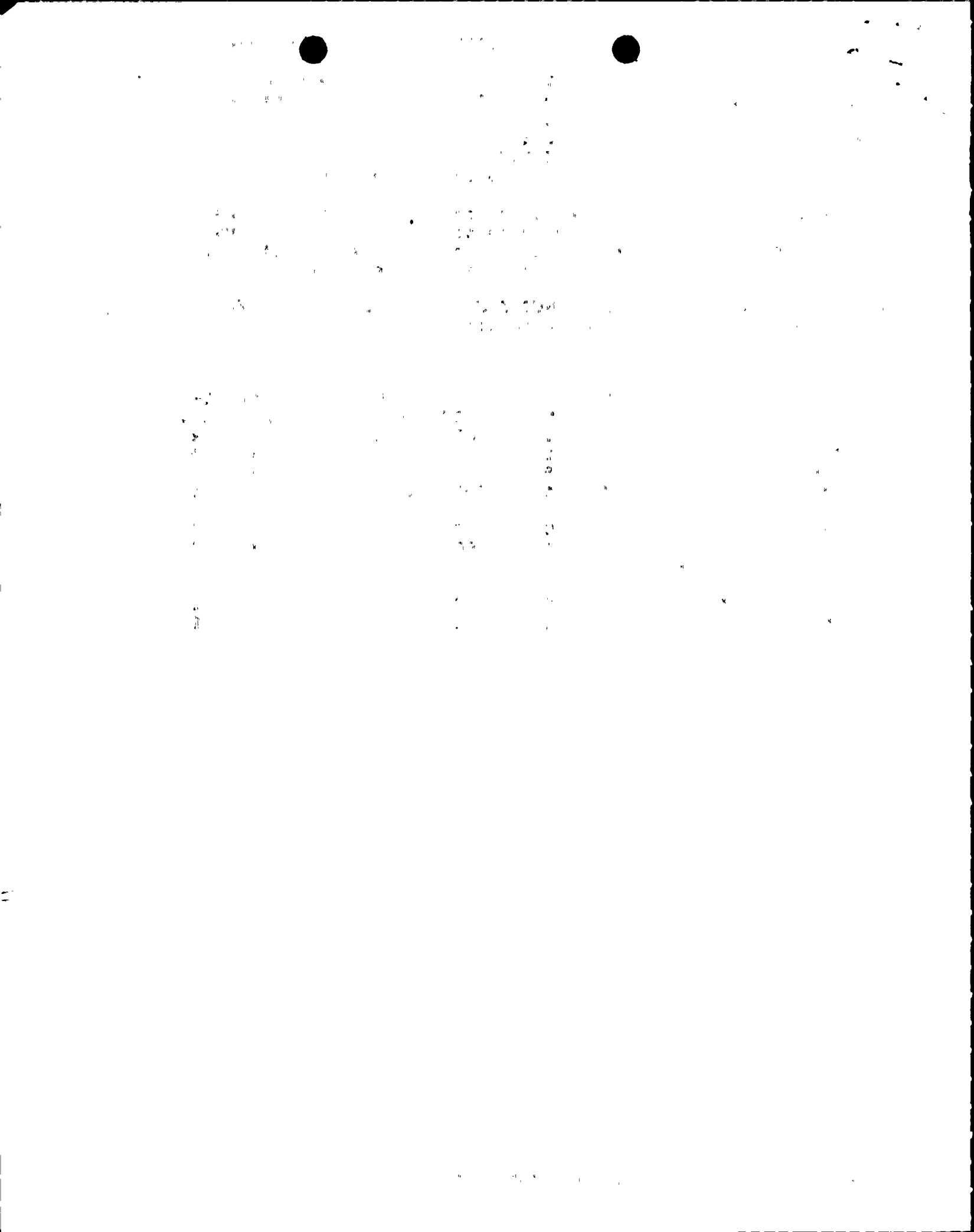
SUBJECT: Responds to 861201 request for addl info to addressing special circumstance requirements of 10CFR50.12 in support of requests for exemptions. Engineering & installation of listed items would result in expenditure of resources.

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JANUARY 30 1987

L-87-41

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D. C. 20555

Gentlemen:

Re: St. Lucie Unit I  
Docket No. 50-335  
Fire Protection  
Additional Information on Technical Exemptions

In response to your request dated December 1, 1986, and consistent with the schedule provided by Florida Power & Light Company (FPL) letter (L-86-518) dated December 22, 1986, FPL is providing the following information to address the "special circumstances" requirements of 10 CFR 50.12. This additional information is intended to supplement our exemption requests dated December 14, 1983, November 28 and December 31, 1984, and February 21, 1985.

The fire protection features at St. Lucie Unit I accomplish the underlying purpose of the rule. To require installation of additional suppression systems, detection systems, and fire barriers would result in the expenditure of engineering and construction resources as well as the associated capital costs. The costs to be incurred are those costs associated with:

Engineering and installation of additional piping, sprinkler heads, and supporting structures and associated surveillances.

Engineering and installation of fire barriers, supports, support protection, and ongoing maintenance.

Engineering and installation of replacements for existing mechanical and electrical containment penetrations.

Engineering and installation of additional fire detection systems and the associated surveillance.

Increased congestion in a number of plant locations complicating future plant modifications/operations.

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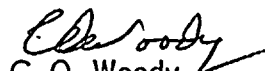
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FPL believes that application of the regulation in these particular circumstances is not necessary to achieve the underlying purpose of Appendix R to 10 CFR 50. See 10 CFR 50.12(a)(2)(ii). Furthermore, the costs to accomplish the above is significantly in excess of those required to meet the underlying purpose of the rule. See 10 CFR 50.12(a)(2)(iii).

Should you have any further questions regarding this matter, please contact us.

Very truly yours,

  
C. O. Woody  
Group Vice President  
Nuclear Energy

COW/GRM/gp

cc: Dr. J. Nelson Grace, Region II, USNRC  
Senior Resident Inspector, USNRC, St. Lucie Plant

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