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MEMORANDUM FOR: A. Schwencer, Chief, Operating Reactors Branch #1, DOR

FROM: G. Lainas, Chief, Plant Systems Branch, DOR

SUBJECT: TURKEY POINT SITE VISIT - FIRE PROTECTION

A site visit to the Turkey Point Plant has been scheduled for the week of October 15, 1979 to obtain information for the resolution of open fire protection issues. The proposed agenda for the site visit is provided in Enclosure 1. The status of our review of the unresolved issues is discussed in Enclosure 2. We request that these enclosures be transmitted to the licensee for his information. The licensee should be requested to make available the personnel and documents necessary to answer the questions implicit in the agenda items. We plan to be at Turkey Point on October 17 and 18, 1979.

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As stated

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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ENCLOSURE 1

TURKEY POINT
SITE VISIT AGENDA

The purpose of this visit is to obtain information to resolve the outstanding issues discussed below.

1. Fire Water Supply

   Visit the area of potentially maximum fire water demand and determine the following:

   a. Maximum fire water demand;

   b. Features that establish the maximum fire water demand;

   c. Safety importance of the area and possible consequences of a fire on safety-related systems;

   d. Pump characteristics - fire pump and screen wash pump;

   e. Water services from Raw Water Storage Tank;

   f. All functions performed by screen wash pumps; and

   g. Screen wash-to-fire system spool piece connection and spool piece storage point.

2. Auxiliary Building Corridor

   Visit the auxiliary building corridor and determine the following:

   a. Separation between redundant divisions of safe shutdown systems in the area;

   b. Fire fighting problems in the area;

   c. Capability to achieve and maintain safe plant shutdown independent of fire damage to equipment and cables in this area;

   d. Installed combustibles in the area and potential for transient combustibles;

   e. Fire hazard posed by hydrogen pipelines; and

   f. Fire doors/dampers/detection.

3. Cable Spreading Room

Visit the cable spreading room and determine the following:

a. Separation between redundant divisions of safe shutdown systems in the room;

b. Fire fighting problems in the room;

c. Safe shutdown systems in the room;

d. Capability to achieve and maintain safe shutdown independent of fire damage to equipment and cables in the room; and

e. Combustibles in the room.

4. Reactor Containment

Description of separation between redundant divisions of safe shutdown cables/equipment inside reactor containment.

ENCLOSURE 2

TURKEY POINT

STATUS OF UNRESOLVED FIRE PROTECTION ISSUES

Additional information is required to resolve four outstanding issues:

1. Fire Water Supply (3.2.2)

2. Auxiliary Building Cooridor (3.2.4)

3. Cable Spreading Area (3.2.5)

4. Technical Specifications (3.2.6)

These issues were identified in the SER sections indicated and involve deviations from NRC guidelines. The licensee's response to these issues has been reviewed. The response is not acceptable, and the issues remain.

The Project Manager (M. Grotenhuis) and the Review Team Leader (L. Derderian) indicate that further discussion with the licensee will not resolve these issues. The licensee has indicated to them that we will have to order compliance with our guidelines, if that is what we desire. However, additional information is required before such an order can be prepared.

The modifications required to resolve these issues to our satisfaction are summarized in Attachment 1 and the specifics of the issues are outlined in Attachment 2 along with a discussion of these issues. A site visit has been scheduled for the week of October 15, 1979 to obtain the information the staff needs to resolve these issues.

SUMMARY OF REQUIRED MODIFICATIONS

TO MEET NRC GUIDELINES

3.2.3 Fire Water Supply

1. A second fire water supply consisting of a 300,000 gallon water storage tank and a new diesel fire pump which meets the guidelines of Appendix A to BTP 9.5-1.

2. A stand-pipe for water services, other than fire protection, which draw from the Raw Water Storage tank.

3.2.4 Auxiliary Building Corridor

1. An automatic sprinkler system designed to prevent exposure fire damage to redundant cable systems in the area.

2. An early warning automatic fire detection system for the chemisty laboratories (hot and cold) and the New Laundry Facility.

3. Three hour fire rated doors for the auxiliary building where the chemistry laboratories and New Laundry Facility interface with the corridor.

4. Three hour fire dampers to isolate the auxiliary building corridor from the chemistry laboratory and new laundry facility.

5. Relocate the hydrogen supply lines in the auxiliary building corridor to a safe location.

6. Barrels made of fire retardant material to replace the plastic barrels for radiation protective clothing in the auxiliary building.

7. An alternate shutdown capability for both units independent of the cabling and equipment in this area.

3.2.5 Cable Spreading Area

1. An automatic gaseous suppression system for the cable spreading room to prevent exposure fire damage to redundant cable systems.

2. Hose stations with sufficient hose to reach all areas of the cable spreading room.

3. Fire rated doors for the cable spreading room doors.

4. An alternate shutdown capability for both units, independent of the cabling and equipment in the cable spreading room.

3.2.6 Technical Specifications

1. A fully trained five man fire brigade

2. A continuous serveillance to be maintained over any inoperable fire barrier in or protecting safety-related areas.

3. Physical dedication of fire water supply by standpipe (Reference 3.2.3).

4. A hydrostatic test of the fire hoses at a pressure of 200 psi, or 50 psi above system pressure, whichever is greater.

5. The time interval permitted to run a fire hose to an inoperable hose station be reduced from eight hours to one hour.

ENCLOSURE 2
Attachment 2

TURKEY POINT PLANT UNIT NOS. 3 AND 4

FIRE WATER SUPPLY (3.2.3)

INTRODUCTION

Our SER indicated that the fire water supply did not comply with several NRC guidelines and that we requested certain actions to resolve these issues. The licensee's response is unacceptable. The staff recommends corrective action.

Guidelines Not Met:

1. Where common tanks are used for fire and other services, minimum fire water storage should be dedicated by means of a vertical standpipe for the other services. (A-26)*

2. Two separate reliable water supplies should be provided. (A-25)*

3. The water supply should be sized for the largest single expected flow. (A-24)* A sufficient number of pumps should be provided so that 100% capacity will be available with one pump inactive (e.g., three 50% pumps or two 100% pumps). (A-25)*

   The largest expected flow rate for a period of two hours should be used to size the water supply but the size should not be less than 300,000 gallons. The flow rate should be based (conservatively) on 750** gpm for manual hose streams plus the greater of: (1) all sprinkler heads opened and flowing in the largest designed fire area; or (2) the largest open head deluge system(s) operations.

Unacceptable Proposals:

Our SER indicated that the licensees proposals to meet the above mentioned guidelines were unacceptable or required verification:

1. The administrative dedication of the fire water storage volume was not acceptable.

2. The method of connection of the screen wash pumps to the fire water system by means of an uninstalled spool piece was not acceptable.

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*Appendix A page reference.
**From new guidance found in R.G. 1.120, Revision 1.

3. The largest single expected water demand was not established. The capability of present fire pumps and the capability of proposed second water supply, utilizing the screen wash pumps, to supply the largest single expected water demand required verification.

Actions Requested:

To resolve these issues, we requested:

1. An additional storage tank with a minimum capacity of 300,000 gallons and standpipes for the water taken from the common raw water storage tank for services other than fire protection to dedicate the fire water supply. (Reference April 10, 1979 NRC letter)

2. The permanent connection of the screen wash system to the fire water system, to improve the reliability of this second supply system. (Reference March 21, 1979 SER)

3. Analysis to establish the largest water demand and to verify that the present fire pumps and the screen wash pumps can provide the required flow rate at the required pressure. (Reference March 21, 1979 SER)

Licensee's Response:

By letter dated May 21, 1979, the licensee responded to the above requests as follows:

1. The letter is silent on the issue of the physical dedication of the water supply.

2. The letter is silent on the issue of the permanent connection of the screen wash pumps to the fire water system.

3. The letter implies that one screen wash pump can meet the present largest water demand because of the licensee's proposal to install a curb to limit the size of potential oil fire. The letter states that due to provision of the curb, the area of demand is reduced from the present 3845 ft^2 to 2685 ft^2; the letter states that either one screen wash pump or one fire pump has the capacity to supply the reduced demand. The fire water system at Turkey Point was approved by the insurer based on an area of demand of 3000 ft^2 and a sprinkler flow density of 0.30 gpm (Reference: Nuclear Mutual Limited Property and Loss Prevention Reports dated January 6 and 7, 1977). Using the figures from the above report, the staff has evaluated the

sprinkler water demand and hose station demand as shown below. It is assumed that a minimum required pressure for the fire suppression system would be 100 psig for the Turkey Point fire water system. The licensee has provided similar calculations for the fire pump and screen wash pump. Using the licensee's assumption for area of demand (with which we do not agree), it is still apparent that while the fire pump has adequate volume and flow rate characteristics, the screen wash pump does not.

	Staff Evaluation	Fire Pump	Screen Wash Pump
Area of Demand, ft^2	3000	2685	2685
Density, gpm/Ft^2	.30	0.50	0.32
Sprinkler Flow, gpm	1050	1340	850
Hose Stream Flow, gpm	750	750	750
Required Total Flow, gpm	1800	2090	1600
Pump Pressure at Total Flow, psig	100 (minimum pressure required)	145	63

Staff Evaluation

Because of the areas of concern (91, 82 and 79) involve safety-related cables which are in or adjacent to the questioned area of water demand and because the grade elevation turbine lube oil areas present an exposure hazard to cables we feel it is particularly important to assure an adequate water supply to fire systems which are the first line of defense against the loss of safety-related cables.

The licensee has stated that "due to the zonal nature of the system", i.e., the concrete pedestal physically separating parts of the system, that the area of demand would be 3945 ft^2. He further states that by installing a curb he will further limit the largest area of demand to 2685 ft^2.

We have evaluated the licensees arguments and we disagree. The turbine building pedestal may or may not act as a fire break and thus prevent the entire area from opening up. We disagree that the proposed curb will limit the area of demand because the curb will not prevent heat from increasing the demand by reaching and opening sprinkler heads in the adjacent areas.

It is apparent from this staff evaluation that the screen wash pumps cannot meet the demand or pressure requirements of the fixed systems.

The licensees Fire Hazards Analysis indicates that the two electrically powered fire pumps are supplied power as follows:

(a) Pump A derives its power from fossil unit 2 load center 2C, and

(b) Pump B derives its power from nuclear unit 2 load center 3C.

The licensee further states that power can be supplied to fire pump B from the nuclear facilities diesel generators by operation of a manual transfer switch in the control room.

It is apparent that a loss of offsite power would defeat both pumps until the operator transfers power to pump B from the emergency bus. It is not certain just how long a period of time is involved to restore power to pump B. It is estimated that this could be accomplished within a few minutes. There is presently no required procedure which would require the operator to restore power to one of the pumps nor is it apparent that he would immediately recognize the need to perform this function. It is clear that a loss of offsite power would result in loss of supply power to at least one of the fire pumps for as long as it takes to restore power from the fossil units.

Staff Recommendations

Because the volume, pumping capabity, and redundancy of the fire water system are fundamental requirements for compliance with General Design Criteria 3, and for implementing an adequate fire protection program, we recommend that the guidelines be enforced.

Because the licensee has not verified the capability of the screen wash pumps as a reliable fire water supply, we recommend that this proposed system not be accepted.

Because the licensee has repeatedly failed to confirm the adequacy of the water supply and has failed to assure the integrity of backup power to the existing fire pumps, we recommend that a new 300,000 gallon Water Storage Tank and a diesel fire pump sized to meet the guidelines be required. This tank and pump shall be dedicated for fire protection service. The tank shall be designed and installed according to NFPA 22 and the fire pump shall be designed and installed in accordance with NRPA 20. The connection from the new pump and tank to the yard main shall be separated from the existing connection by a substantial distance. Proper valving adjacent to this connection shall also be installed.

Because the licensee has not verified that the other water services taken from the common water storage tank do not degrade the existing fire water supply, we recommend that a standpipe be installed for the other services.

TURKEY POINT PLANT, UNIT NOS. 3 AND 4

AUXILIARY BUILDING CORRIDOR (3.2.4)

INTRODUCTION

Our SER indicated that the fire protection for this area does not comply with several NRC guidelines and that we requested certain actions to resolve these issues. The licensee's response is unacceptable. The staff recommends corrective action.

Guidelines Not Met

The specific guidelines that are not met are:

1. Automatic water sprinkler systems should be provided for cable trays outside the cable spreading room. (A-18)

2. When safety related cables do not satisfy the provisions of Regulatory Guide 1.75 all exposed cables should be covered with an approved fire retardant coating and a fixed automatic water fire suppression system provided. (A-18)

3. The licensee has not adequately shown that safe shutdown can be accomplished if asevere fire occurs in this area. (Ref. "Supplementary Guidance on Information needed for Fire Protection Evaluation," dated September 13, 1976).

Our SER indicated that the licensees proposals to meet these guidelines were unacceptable or required verification.

Unacceptable Proposals:

1. The reliance on only manual fire suppression for this area is unacceptable.

2. The licensee has not provided sufficient information to conclude that safe shutdown of both units can be accomplished independent of this area and alternate safe shutdown capability is unverified.

3. The licensee's withdrawal of certain commitments is unacceptable. (Ref. FPL letter of April 5, 1979 and SER pp. 3-1, 3-2, 3-3, 3-4, and 3-5)

Actions Requested

Our March 2 letter to the licensee requested that a task manpower analysis be provided to substantiate the licensee's basis that the plants could be shutdown independent of fire damage in the auxiliary building corridor.

Licensee's Response

The licensee's submittal dated April 5, 1979 states that the fire hazards analysis demonstrates the plants' capability to achieve safe shutdown conditions notwithstanding the effects of design basis fires. This letter also requested that we reconsider our request for a task manpower estimate.

Staff Evaluation

The Fire Hazards Analysis does not contain sufficient information to demonstrate the plants capability to achieve safe shutdown conditions using equipment and systems that are independent of the auxiliary building corridor. The hazards analysis concludes that the fire damage consequences are tolerable by assuming breakers and valves can be manually operated. It does not address the number of such operations which must be performed, their required time sequences, the operations necessary to overcome the adverse actions which may occur as a consequence of the fire or the manpower required for such operations.

The fire protection for this area does not meet the NRC guidelines of Appendix A to BTP 9.5.1.

The fire protection for this area is less conservative than that found acceptable for similar areas in other plants. The staff recommends that more margin in the form of an alternate shutdown systems, barriers, and automatic suppression should be required.

Because the fire protection for areas of this type is fundamental to establishing the minimum requirements to meet GDC-3, we recommend that staff guidelines be enforced.

Staff Recommendation

1. We recommend that an automatic sprinkler system be installed in the area and designed to prevent exposure fire damage to redundant cable systems in the area.

2. We recommend that an alternate shutdown capability be provided for both units independent of the cabling and equipment in this area.

3. We recommend that the following items be implemented:

   a. Early warning automatic fire detection for the chemistry laboratories (hot and cold) and the New Laundry Facility.

   b. Doors be replaced with 3-hour rated fire doors in the chemistry lab and New Laundry Facility which interface with the auxiliary building corridor.

c. Three hour fire dampers be provided to isolate the auxiliary building corridor from the chemistry laboratory and new laundry facility.

d. Relocate the hydrogen supply lines in the auxiliary building corridor.

e. Replace the plastic barrels for radiation protective clothing in the auxiliary building with barrels made of fire retardant material.

TURKEY POINT PLANT UNIT NOS. 3 AND 4

CABLE SPREADING ROOM (3.2.5)

INTRODUCTION

Our SER indicated that the fire protection for this area does not comply with several NRC guidelines and that we requested certain actions to resolve these issues. We requested the capability to achieve safe shutdown independent of the cable spreading room. The licensee's response is unacceptable. The staff recommends corrective action.

Guidelines Not Met

The specific guidelines that are not met are:

1. "Safety related systems should be isolated or separated from combustible materials. When this is not possible because of the nature of the safety system or the combustible materials, special protection should be provided to prevent a fire from defeating the safety system function. Such protection may involve a combination of automatic fire suppression, and construction capable of withstanding and containing a fire that consumes all combustibles present." (A-16)

2. "When safety related cables do not satisfy the provisions of Regulatory Guide 1.75 all exposed cables should be covered with an approved fire retardant coating and fixed automatic water fire suppression system should be provided." (A-18)

3. "Plants that cannot meet the guidelines of Regulatory Guide 1.75.... an auxiliary shutdown system with all cabling independent of the cable spreading room should be provided." (A-39)

4. The licensee has not adequately shown that safe shutdown can be accomplished for fires in this area in accordance with "supplementary guidance on information needed for fire Protection Program Evaluation dated September 13, 1976.

Unacceptable Proposals

1. The reliance on only manual fire suppression of this area is unacceptable.

2. The shutdown capability of both units, independent of this area is unverified.

3. The licensee's withdrawal of certain commitments is unacceptable. Reference FPL letters of April 5, 1979 and SER pp. 3-1, 3-2, 3-2, 3-4 and 3-5.

Actions Requested

Our March 2, 1979 letter to the licensee requested that:

1. An automatic sprinkler system be installed in the cable spreading room.

2. A task/manpower evaluation be performed to demonstrate that the plant has the procedures and manpower to shutdown both units independent of cabling and equipment in the cable spreading room.

Licensee Response

The licensee's submittal dated April 5, 1979 states that the fire hazards analysis demonstrates the capability to achieve safe shutdown conditions notwithstanding the effects of design basis fires. This letter also requested that we reconsider our request for a task manpower estimate.

Staff Evaluation

The Fire Hazards Analysis does not contain sufficient information to demonstrate theplant's capability to achieve safe shutdown conditions in both units using equipment and systems that are independent of the cable spreading room. The hazards analysis concludes that fire damage consequences are tolerable by assuming breakers and valves can be manually operated. It does not address the number of such operations which must be performed, their required time or the operations sequence necessary to overcome the adverse actions which may occur as a consequence of the fire or the manpower required for such operations.

Thelicensee's philosphy assumes that use of Flameastic cable coating precludes the need to consider adequate separation. The staff has not been able to confirm what the separation between redundant divisions is in order to make a decision. Therefore, the staff has been forced to assume that redundant divisions are not adequately separated.

The fire protection for this area does not meet the NRC guidelines of Appendix A to BTP 9.5-1.

The fire protection for this area is less conservative than that found acceptable for similar areas in other plants.

Because of the fire protection for areas of this type is fundamental to establishing the minimum requirements to meet General Design Criterion 3, we recommend that the staff guidelines be enforced.

Staff Recommendations

1. We recommend that an automatic gaseous suppression system be provided for the cable spreading room to prevent exposure fire damage to redundant cable systems.

2. We recommend that an alternate shutdown system be provided independent of the cables and equipment in the cable spreading room be provided for both units.

3. We recommend that the following items be implemented:

   a. Provide hose stations with sufficient reach for the cable spreading room.

   b. Replace cable spreading room doors with fire rated doors.

Technical Specifications for Fire Protection Equipment (3.2.6).

INTRODUCTION

In our letter dated November 25, 1977, we provided interim Technical Specifications based on the Safety Evaluation included with the letter. We determined that these Technical Specifications should be implemented by amendment to the Turkey Point Plant Unit Nos. 3 and 4 operating licenses. We also asked that objections to any specific requirements be submitted in writing within 20 days. On December 22, 1977, FPL responded with certain objections and proposed Technical Specifications consistent with the objections.

In our letter dated November 8, 1978, we transmitted amendments 42 and 34 which incorporated Technical Specifications for existing fire protection equipment. In our letter we noted that certain items were still under review. In our letter dated March 21, 1979, we amended the license for the Turkey Point Plant to incorporate conditions relating to fire protection. In the supporting Safety Evaluation we noted that our review of the above incomplete items was continuing. We now have completed our review of the incomplete items and have come to the following conclusions:

1. The current Technical Specifications (6.2.2.f) requires a fire brigade composed of three men. We noted in our letter of November 8, 1978 that we felt that a five man brigade was necessary to provide adequate fire protection. In the FPL letter dated June 23, 1979 supplemented by the letter dated November 7, 1978, FPL stated that a three men brigade was adequate. However, FPL added that an additional two persons would be available to the brigade and that they would be trained to identify and locate equipment. On May 17, 1979, we informed FPL by phone that we had completed our review on the matter and had concluded that a fully trained five man fire brigade was still the position of the staff. The FPL reply was that the letters of June 23, 1978 and November 7, 1978 were still the FPL position. Our basis for the fire brigade is contained in letters to you dated February 3, 1978 and June 5, 1978. Based on our review of the FPL position on this matter, we will require that a fully trained five man fire brigade be provided. This matter is being handled on a generic basis and is a separate action item.

The current Technical Specification (3.14.4.a) requires inspection of an inoperable fire barrier at least once per hour according the FPL position. Our position is based on the Standard Technical Specifications and the Safety Evaluation accompanying our letter dated November 25, 1977, and our subsequent review. Our position requires that a continuous surveillance be maintained over an inoperable fire barrier according to the Standard

Technical Specifications. The FPL inspection frequency does not provide sufficient incentive to restore barriers promptly should they be reached. It does not allow credit for a detection system. We have completed our review of the FPL position on this matter and have concluded that the continuous surveillance is necessary under certain conditions. Based on our review we will require that a continuous surveillance be maintained over any inoperable fire barrier in or protecting safety-related areas. According to the following wording:

3.14.4 Fire Barrier Penetration

All penetration fire barriers protecting safety related areas shall be functional when equipment in those areas are required to be operable. With the penetration fire barrier non-functional:

1. The operability of the fire detection systems providing coverage for the fire areas on either side of the penetration, as applicable, shall be verified within one hour.

2. If either of the detection systems are inoperable, a continuous fire watch shall be established on at least one side of the affected penetration within one hour.

3. If either the actions of (1) or (2) above are not completed within the required time, prepare and submit a thirty-day written report pursuant to 6.9.2.b.

4. The current Technical Specification (4.15.2.a.1) requires an increased inspection frequency in lieu of physical dedication of the fire protection water supply per FPL positions, pending completion of the staff review. Our basis was contained in position PF-19 in our letter of April 10, 1978 and our Safety Evaluation accompanying in letter dated November 25, 1977. We do not feel that administrative inspection is as effective in preserving the integrity of the water supply as physical dedication by standpipe. We have completed our review of the FPL position on this matter and our basis and conclusions are as given in 3.2.3 above.

5. The current Technical Specification (4.15.3.a.4) requires that a hydrostatic test of the fire hoses be performed at a pressure at least equal to that of the system pressure according to the FPL position. We have completed our review of the FPL position on this matter and based on this review, the Safety Evaluation accompanying our November 25, 1977 letter, and the pressure of the Turkey Point system we have concluded that the current Technical Specifications are not acceptable. We will require that the hydrostatic test of the fire hoses be performed at a pressure of 200 psi or 50 psi above system pressure whichever is greater.

6. The current Technical Specification (3.14.3.a) permits a time interval of 8 hours to run a fire hose to an area with an inoperable hose station according to the FPL position. The FPL position has no reasonable relationship to the time required to perform the task. We have completed our review of the FPL position on this matter and based on their review and Standard Technical Specifications and our Safety Evaluation accompanying our November 25, 1977 letter we have concluded that the time interval should be reduced to one hour. Therefore, we will require that the time interval be permitted to run a fire hose to an inoperable hose station be reduced from eight hours to one hour.