

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of

Docket Nos. 50-250
and 50-251

FLORIDA POWER AND LIGHT
COMPANY

(Turkey Point Plant,
Unit Nos. 3 and 4)

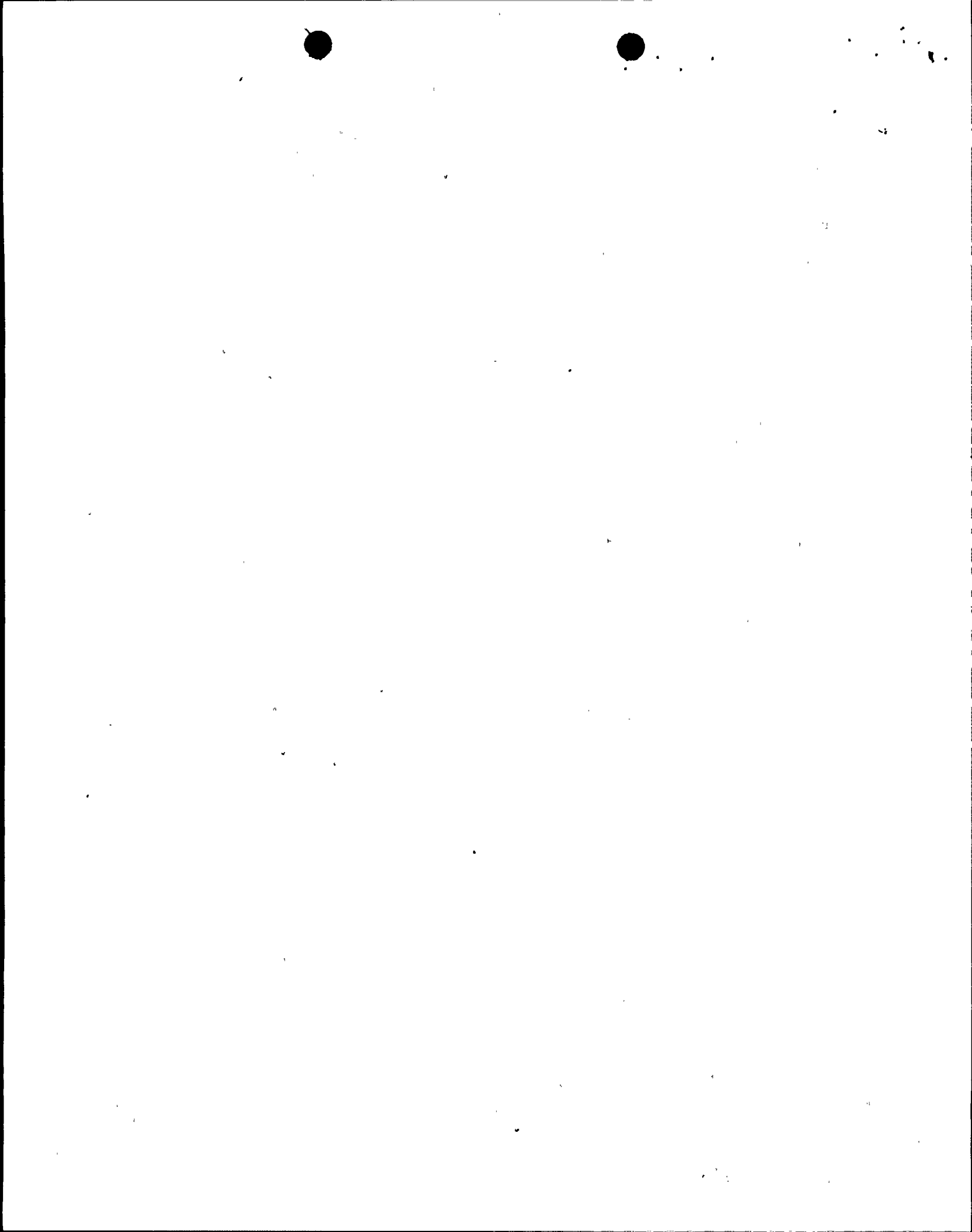
EXEMPTION

I.

Florida Power and Light Company (the licensee) is the holder of Facility Operating License Nos. DPR-31 and DPR-41 which authorize the operation of the Turkey Point Plant, Unit Nos. 3 and 4 (the facilities) at steady-state power level not in excess of 2200 megawatts thermal. The facilities are pressurized water reactors (PWRs) located at the licensee's site in Dade County, Florida.

II.

Section III.A of Appendix R to 10 CFR Part 50 requires "two separate water supplies shall be provided to furnish necessary water volume and pressure to the main fire loop." In the case of Turkey Point Plant this required that Florida Power and Light Company (FPL) must, as a minimum (1) modify the existing on-site 500,000 gallon water tank by installing a new standpipe to



- 2 -

dedicate a minimum of 300,000 gallons of the capacity of that tank to fire protection purposes; (2) design, engineer, procure, and construct a new on-site water tank of 750,000 gallon capacity, to include a redundant water supply of at least 300,000 gallons; and (3) install an automatic starting diesel fire pump to supply the fire systems.

The schedule, set out in §50.48(c)(2) applies to the installation of the modifications described above. That schedule requires that those modifications be installed nine months after the effective date of the rule, or by November 19, 1981. By letter dated November 9, 1981, the NRC granted FPL an exemption from the schedular requirements of 10 CFR 50.48(c)(2). The exemption extended the date by which Turkey Point Plant must be in compliance with Section III.A of Appendix R to 10 CFR 50 to March 31, 1984. The basis for granting the schedular exemption was the time required for engineering, procurement and construction associated with the modifications described above.

III.

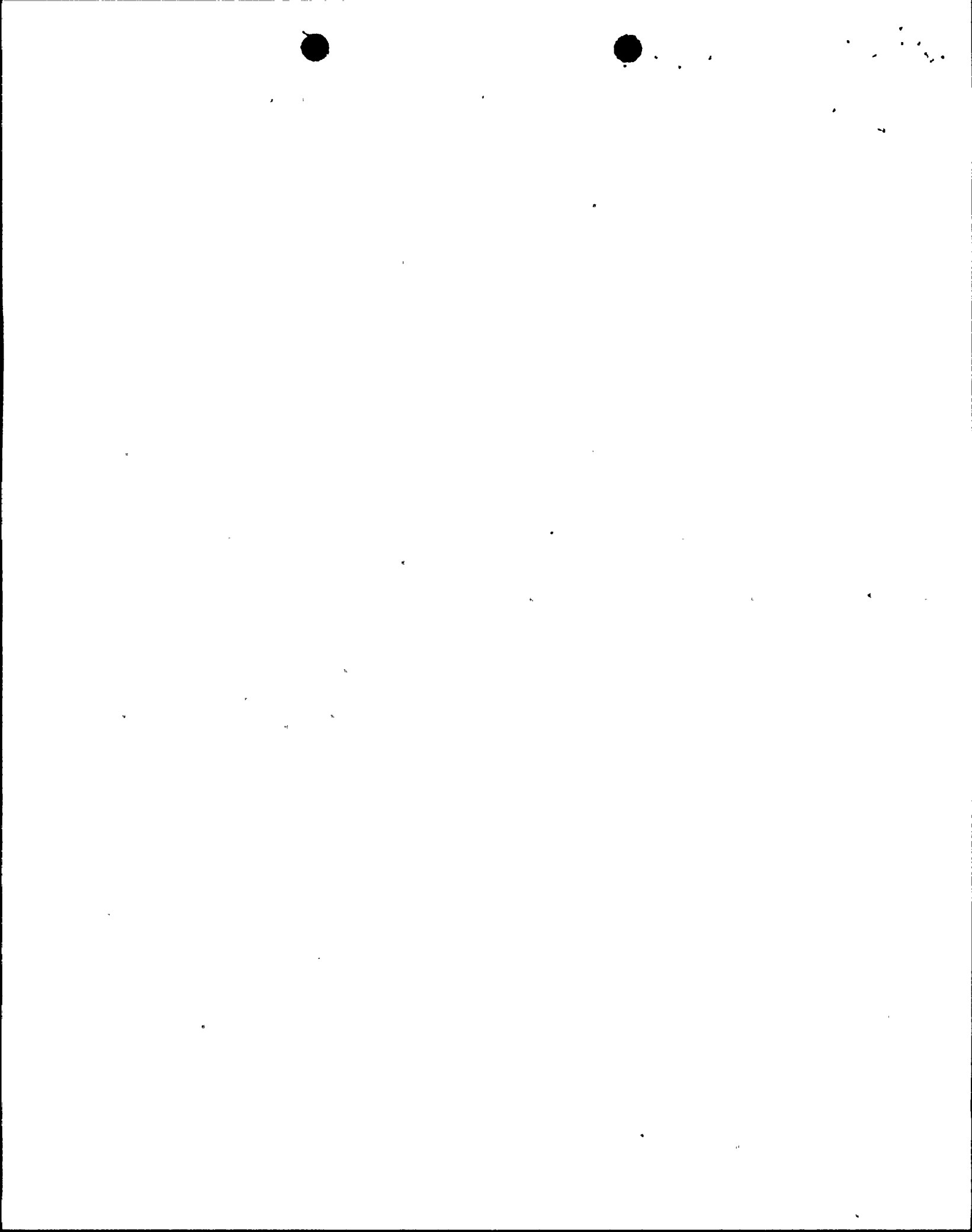
By letter dated February 10, 1984, FPL requests that an extension be granted to December 31, 1984, by which time they must be in compliance with Section III.A of Appendix R. The extension is required due to premature failure of protective coatings in both the existing and new Raw Water Storage Tanks (RWT) which contain the water supply for fire protection and identification of non-dedicated water connections on the fire main.

The problem was identified initially in preparing to place the new RWT in service. It was noted that rust spots were developing on the roof plating where the protective coating had failed. The upper portion of the existing tank was inspected indicating the original protective coating had completely failed on the interior ceiling and roof framing, the heavy rust scale resulting from the failed protective coating could impact the structural capability. The wall coating also exhibited cracks and blistering which could result in additional rusting.

In addition to the protective coating problem, water connections on the fire protection main have been identified which are not for fire protection purposes. Some of the connections were installed underground during the initial construction of Turkey Point fossil Units 1 and 2. These connections were not identified by the licensee or the NRC during the initial fire protection reviews. However the licensee identified the connections during a recent internal audit and intends to remove all connections from the fire mains which are not dedicated for fire protection purposes.

The request for the schedular extension to December 31, 1984, is necessary to perform the following corrective actions:

- 1) Make necessary repairs to the RWT's structure and protective coatings.
- 2) Remove the connections from the fire protection main which are not for fire protection purposes.



- 4 -

- 3) Perform modifications necessary to transfer the non-dedicated connections to the Service Water System.
- 4) Perform other modifications to improve and enhance the Fire Protection System operability including installation of redundant jockey pumps.

The preventive and corrective maintenance performed on the RWTs will minimize future tank downtime and the removal of the non-dedicated connection from the fire protection main will assure dedication of the required water volume for fire protection purposes.

In the interim period, FPL will maintain one of the two RWTs available for a source of fire water and the capability to provide additional fire water from the discharge header of the three screen wash pumps. Each of the screen wash pumps are capable of supplying 1,680 gallons per minute and are sufficient to meet the maximum area of water demand. The analysis to support the adequacy of this interim action is provided in the licensee's letter dated May 7, 1980 relating to fire protection. Thus, the necessary redundancy of fire water supplies is met. This compensatory action coupled with the Turkey Point Fire Protection Program provides sufficient protection against fire hazards.

Based on the details provided above, the Commission has determined that an extension of the schedular requirements identified in §50.48(c)(2) to assure compliance with Section III.A "Water Supplies for Fire Suppression System" of Appendix R to 10 CFR 50 should be granted.

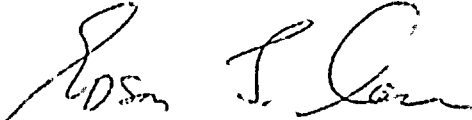
IV.

Accordingly, the Commission has determined that, pursuant to 10 CFR 50.12, an exemption is authorized by law and will not endanger life or property or the common defense and security and is otherwise in the public interest and hereby grants the following exemption with respect to the schedular requirements of §50.48(c)(2) as it relates to Section III.A of Appendix R to 10 CFR 50:

The date which FPL must be in full compliance with Section III.A of Appendix R to 10 CFR 50 is December 31, 1984.

The NRC staff has determined that the granting of this Exemption will not result in any significant environmental impact and that pursuant to 10 CFR §51.5(d)(4) and environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with this action.

FOR THE NUCLEAR REGULATORY COMMISSION



Edson G. Case, Deputy Director
Office of Nuclear Reactor Regulation

Dated at Bethesda, Maryland
this 21st day of March 1984

