

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of

FLORIDA POWER AND LIGHT
COMPANY

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

Docket Nos. 50-250
and 50-251

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 levels 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.

On November 19, 1980, the Commission published a revised Section 10 CFR 50.48 and a new Appendix R to 10 CFR Part 50 regarding fire protection features of nuclear power plants (45 FR 76602). The revised Section 50.48 and Appendix R became effective on February 17, 1981. Section 50.48(c) established the schedules for satisfying the provisions of Appendix R.

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Section 50.48(c)(2) specifies schedules for modifications not requiring prior NRC approval and non-outage related, Section 50.48(c)(3) specifies schedules for modifications not requiring prior NRC approval and outage related, and Section 50.48(c)(4) specifies schedules for modifications pursuant to Section III.G.3 of Appendix R (alternate safe shutdown capability) which requires NRC approval and applies to both non-outage and outage related activities.

By letter dated November 16 and supplemented on December 14, 1984, the licensee requested exemptions to the schedular requirements of 10 CFR 50.48, Sections (c)(2), (c)(3) and (c)(4) for six items pursuant to 10 CFR 50.12. The six items, current schedules required by Section 50.48 and the requested extensions are:

Units 3 and 4

- 1) Water Suppression - Required by 50.48(c)(2), January 31, 1985
- Requested extension (3 mos), April 30, 1985
- 2) Structural Steel Fire Proofing - Required by 50.48(c)(2) & (c)(3), January 31, 1985
- Requested extension (approx. 12 mos.) Unit 4, fall 1985, Outage plus 1 month
- 3) Fire Dampers - Required by 50.48(c)(2) & (c)(3), January 31, 1985
- Requested extension (approx. 11 mos.) Unit 4, Fall 1985, Outage
- 4) Penetration Seals - Required by 50.48(c)(2) & (c)(3), January 31, 1985
- Requested extension (approx 12 mos.) Unit 4, Fall 1985, Outage plus 1 month

Unit 3 Only

- 5) Paceway Protection - Required by 50.48(c)(2) & (c)(3), January 31, 1985
- Requested extension (approx. 4 mos.) Unit 3, Spring 1985, Outage plus 1 month



- 6) Alternate Shutdown
- Required by 50.48(c)(4) Unit 3, Spring 1985, Outage
 - Requested extension (approx. 18 mos.) Unit 3, Winter 1986, Outage

III.

Reasonable interim compensatory measures for fire protection and post-fire safe shutdown capability must be provided in order to grant schedular exemptions from the implementation schedules defined in 10 CFR 50.48.

The licensee will implement three roving fire watch patrols in all areas for which schedular relief has been requested as compensation pending the completion of the modifications in items 1 through 5 identified above. The fire watch patrols will be implemented January 31, 1985, and continue until all fire protection work identified for Appendix R in each of the affected fire areas has been completed and is operable. All procedures and training needed for the fire watch patrols will be completed and available prior to the January implementation date.

The roving fire watch patrols will identify any indication of fire, smoke or burning odor and will immediately notify the control room; will be trained in the use of portable fire extinguishers; and will log-in at specific zones in their fire areas every 20 minutes on log sheets as detailed in the licensee's submittal.

In addition to the roving fire watch patrols, the licensee will implement a 24 hour continuous fire watch in the cable spreading room, the auxiliary building north-south breezeway and the control room as compensation pending completion of the alternate shutdown capability for Unit 3. The continuous fire watches will be implemented prior to the Unit 3

start-up after the spring 1985 refueling outage and continue until all the Unit 3 alternate shutdown work has been completed and the equipment is operable.

All procedures and training required for the continuous fire watches for each of the three areas identified above will be completed and available prior to the watch implementation date. The fire watches will identify any indication of fire, smoke or burning odor and will immediately notify the control room; will be trained in the use of portable fire extinguishers; and will supplement their continuous observations by making area-wide surveys at a frequency of once every 20 minutes as detailed in the licensee's submittal.

If a fire should occur within any fire area monitored by the roving fire watch patrols or the continuous 24 hour fire watches, there is reasonable assurance that the fire will be detected in its incipient stage before significant flame propagation or temperature rise occurs. Upon discovery of a fire, the control room will be immediately notified and a fire brigade response initiated. The fire patrols and watches will be trained in the proper use of portable fire extinguishers and be capable of controlling or suppressing the fire to minimize damage pending arrival of the fire brigade.

The projected status of the Appendix R fire protection related work for the Turkey Point Plant as of January 31, 1985, is detailed in the licensee's December 14, 1984 letter. The hangers will be fabricated and installation of the water and halon suppression systems started. Substantial portions of fire detection, barriers and fire doors will be completed. Thirty-five percent of the penetration seals and the major portion of the conduit for

cable rerouting will also be completed. The design documents for alternate shutdown will be available and installation started. Fire damper related work is currently on a hold status until resolution of qualification problems with the vendor.

IV.

Based on the considerations and current status of the fire portion related work discussed above, the staff has concluded that the licensee has provided sound rationale for the need of schedular relief; a best effort is being expended to complete the Appendix R related work; and reasonable and acceptable interim measures for fire protection and alternate shutdown capability to support the requested schedular exemptions have been provided. Therefore, based on our evaluation, the staff has concluded that the requested schedular exemption from the requirements of 10 CFR 50.48, Sections (c)(2), (c)(3) and (c)(4) should be granted.

Accordingly, the Commission has determined that, pursuant to 10 CFR 50.12, the schedular exemptions requested by the licensee's letter of November 16, 1984 and supplemented on December 14, 1984, are authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest.

The Commission hereby grants the licensee exemptions from the schedular requirements of 10 CFR 50.48, Sections (c)(2), (c)(3) and (c)(4) for the following six areas and duration:

Units 3 and 4

- 1) Water Suppression - April 30, 1985
- 2) Structural Steel - Unit 4, Fall 1985, Outage startup plus one month Fire Proofing



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- 3) Fire Dampers - Unit 4, Fall 1985, Outage startup plus one month
- 4) Penetration Seals - Unit 4 Fall, 1985, Outage startup plus one month

Unit 3 only

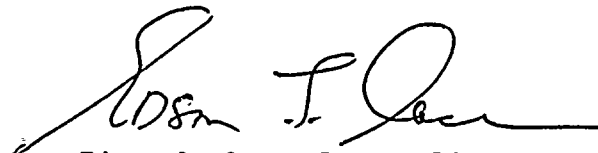
- 5) Raceway Protection - Unit 3, Spring 1985, Outage startup plus one month
- 6) Alternate Shutdown - Unit 3, Winter 1986, Outage startup

Pursuant to 10 CFR 51.32, the Commission has determined that the issuance of the exemption will have no significant impact on the environment (50FR 2112 , dated January 15, 1985).

For further details with respect to this action, see the request for exemption dated November 16 and supplement dated December 14, 1984, which are available for public inspection at the Commission's Public Document Room, 1717 H Street, N.W., Washington, D.C., and at the Environmental and Urban Affairs Library, Florida International University, Miami, Florida 33199.

This Exemption is effective upon issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



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

Dated at Bethesda, Maryland
this 14th day of January 1985