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 AUTH.NAME      AUTHOR AFFILIATION  
 HOVEY,R.J.      Florida Power & Light Co.  
 RECIP.NAME      RECIPIENT AFFILIATION  
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SUBJECT: Forwards supplemental info re request for exemption for fire rating of raceway fire barriers in outdoor fire area excluding turbine bldg.

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L-98-275  
10 CFR Part 50 Appendix R

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

Subject: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Supplemental Information-  
Request for Exemption - Fire Rating of Raceway Fire  
Barriers in the Outdoor Fire Area Excluding the Turbine Building

By letter L-96-318 dated December 12, 1996, Florida Power & Light Company (FPL) submitted a request for exemption from certain requirements of 10 CFR 50 Appendix R for raceway fire barriers in the outdoor areas excluding the open turbine building at Turkey Point Units 3 and 4.

Based on discussions with the NRC staff during the September 14, 1998, meeting at the Turkey Point plant, it was determined that the above referenced exemption request should be limited to those fire zones that contain protected safe shutdown circuits. Fire Zone 131 does not contain protected safe shutdown circuits. Accordingly, the request for exemption is being withdrawn for Fire Zone 131. Attached are the marked-up pages from the FPL letter L-96-318 submittal, modified to exclude Fire Zone 131 and related information.

This supplemental documentation, provided to the NRC staff during the September 14, 1998, meeting, is hereby formally submitted.

Very truly yours,

R. J. Hovey  
Vice President  
Turkey Point Plant

OIH

Attachment

cc: Regional Administrator, Region II, USNRC  
Senior Resident Inspector, USNRC, Turkey Point Plant

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PDR ADOCK 05000250  
F PDR

ADOCK

- 4) Separation of cables and equipment and associated non-safety circuits of redundant trains by a radiant energy shield having an equivalent 30-minute fire rating until a horizontal distance of 20 feet is attained. A radiant energy shield is a line of sight barrier between redundant equipment and/or components. The radiant energy shield may be combustible. No suppression or detection is provided.
- 5) The existing separation of approximately 12 feet on center for the CCW Pumps combined with fire detection and a dual-header partial-coverage suppression system for the pumps.
- 6) The existing separation of approximately 14 feet on center for the ICW Pumps and associated conduits, with fire detection for the pumps. No suppression is provided.
- ~~7) The use of a partial height (10 feet high) fire barrier between the Unit 3 EDG "A" and "B" radiator rooms. No suppression or detection is provided.~~

#### C. Fire Zones Associated with the Exemption

The fire zones within the scope of the exemption request are listed below with respect to the exemption sections to which they apply (refer also to the attached drawings for fire zone boundary descriptions):

- 1) Fire Zones 81; and 86 West of the A-line.
- 2) Fire Zones 47 and 54; 86 North of column line 22 and East of the A-line; 79, 84, 88 and 89 East of the Jc-line; and 106R, 113, 114, 115, 116, 118, 119, 120, ~~131~~ and 143.
- 3) Fire Zones 106R, 114, 115, 118 and 143.
- 4) Fire Zones 47 and 54; 86 North of column line 22 and East of the A-line; 79, 84, 88 and 89 East of the Jc-line; and 106R, 113, 114, 115, 116, 118, 119, 120, ~~131~~ and 143.
- 5) Fire Zones 47 and 54.
- 6) Fire Zones 119 and 120.
- ~~7) Fire Zone 131.~~

**D. Exemption Fire Zone Descriptions**

<u>Fire Zone</u>	<u>Description</u>
47	Unit 4 Component Cooling Water Pump & Heat Exchanger Area
54	Unit 3 Component Cooling Water Pump & Heat Exchanger Area
79 (partial)	Area West of Unit 4 Containment
81	Unit 4 Main & Startup Transformer, Unit 3 Turbine Lube Oil Reservoir
84 (partial)	Unit 3 & 4 Auxiliary Feedwater Pump Area
86	Unit 3 Main and Startup Transformers
88 (partial)	Unit 3 Switchgear/Emergency Diesel Generator Vestibule
89 (partial)	Unit 3 Condensate Storage Tank Area
106R	Control Building Roof (Control Room Air Conditioning Units)
113	Unit 4 Feedwater Platform
114	Unit 4 Main Steam Platform
115	Unit 3 Main Steam Platform
116	Unit 3 Feedwater Platform
118	Auxiliary Building (& partial Control Building) Roof
119	Unit 4 Circulating Water Intake Structure
120	Unit 3 Circulating Water Intake Structure
<del>131</del>	<del>Unit 3 Emergency Diesel Generator Radiator Room</del>
143	Unit 3 Emergency Diesel Generator Building Roof

A detailed description of the combustible loading, installed essential equipment and fire detection and suppression features for the fire zones which are included in the exemption request is provided in Section 0.

**E. Bases for Requested Exemption**

The requested exemption is consistent with the requirements of 10 CFR 50.12 and should be granted. First, in accordance with subsection 50.12(a)(1), it is clear from the discussion herein that the exemption sought by FPL for Turkey Point is authorized by law, will not present an undue risk to the public health and safety, and is consistent with the common defense and security.

(1) Authorized by Law. As discussed above, exemptions from Appendix R are expressly authorized by law. This authority is confirmed by past Commission practice since the promulgation of Appendix R, under which the Commission was granted numerous exemptions from Appendix R requirements. In its Staff Requirements Memorandum dated June 27, 1994, "Options for Resolving the Thermo-Lag Fire Barrier Issues," the Commission reaffirmed this practice as specifically applied to exemptions involving the use of Thermo-Lag as a fire barrier. In that letter, the Staff stated that the Commission would consider specific exemptions from certain technical requirements of Appendix R, "provided the licensee submits a technical basis that demonstrates the in-plant condition provides an adequate level of fire safety." Therefore, by law, the Commission is authorized to grant exemptions from Appendix R.