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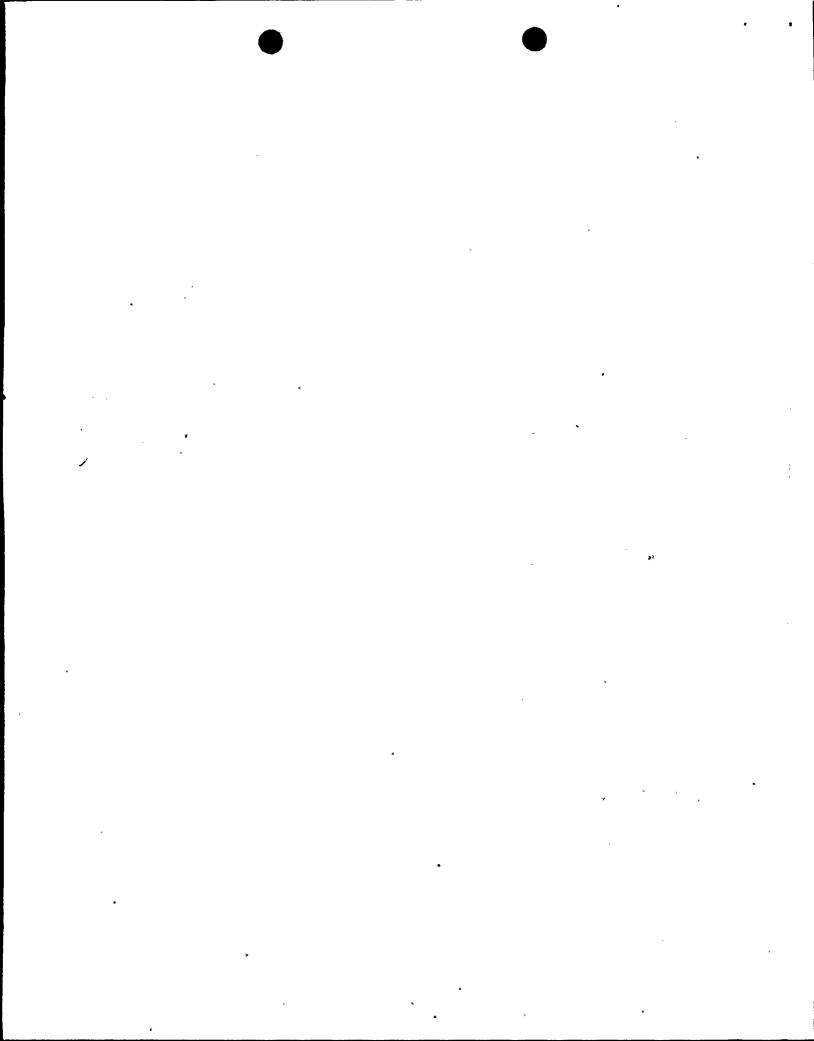
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MAR 08 1999

L-99-054 10 CFR Part 50 Appendix R

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

Turkey Point Units 3 and 4 Subject:

Docket Nos. 50-250 and 50-251

Request for Exemption - Fire Rating of

Raceway Fire Barriers in the Open Turbine Building

By letter L-97-181 dated July 31, 1997, 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 Open Turbine Building at Turkey Point Units 3 and 4. This letter was supplemented by letters L-98-153 dated July 2, 1998; L-98-255 dated October 27, 1998; and L-98-298 dated December 9, 1998. By letter dated December 22, 1998, the NRC granted the exemption.

FPL has reviewed the December 22, 1998, NRC letter issuing the exemption requested. Attachment 1 provides a tabulated summary of FPL review comments. Attachment 2 provides a marked up copy of the NRC letter and supporting Safety Evaluation Report.

Should there be any questions, please contact us.

truly yours,

R. J. Hovey Vice President

Don Jernig.

Turkey Point Plant

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Attachments

Regional Administrator, Region II, USNRC Senior Resident Inspector, USNRC, Turkey Point

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TABULATED SUMMARY OF FPL REVIEW COMMENTS

No.	Document Reference	Item	Proposed Revision	Basis/Justification
1	Exemption, Page 2	E-1	None	Clarification - FPL RAI
	Safety Evaluation, Page 7			response, dated July 2, 1998,
[describes the location for 1-hour
	;			rated fire barriers in the Turbine
				Bldg.
2	Exemption, Page 3	Column lines E-1 and Jc	column line E-1 and J	Typo - Ref. Safety Evaluation,
	Safety Evaluation Page 3			Page 10, Paragraph 4.b.
3	Safety Evaluation, Page 4,	"approximately 100 gallonsin the lube oil	Approximately 1000 gallonsin each	Typo - Ref. FPL Turbine Bldg.
	Section 3.2, 1st Paragraph	conditioners."	lube oil conditioner.	Exemption Request, dated July
				31, 1997, Page 11.
4	Safety Evaluation, Page 4,	"The above components are protected"	The auxiliary transformers,	Clarification - Ref. FPL RAI
1	Section 3.2, 2nd Paragraph		hydrogen seal oil units and turbine	response, dated July 2, 1998.
	•		lube oil transfer skids are protected	
5	Safety Evaluation, Page 6,	"Unit 3 Main Condenser"	Unit 3 Main Condenser Area	Typo - Ref. FPL Turbine Bldg.
	Table			Exemption Request, dated July
.				31, 1997, Page 6.
6	Safety Evaluation, Page 6	"column lines A to E and 23 to 26."	column lines A to E and 22 to 26.	Typo - Column 22 is the north
				boundary of the Turbine Bldg.
7	Safety Evaluation, Page 7	"turbine and its auxiliaries,"	turbine/generator bearings,	Clarification - Ref. FPL RAI
				response, dated July 2, 1998.
8	Safety Evaluation, Page 7	268,680 gallons	None	Clarification - Values provided
1				in FPL RAI response, dated July
				2, 1998, were preliminary. Final
				design values are slightly higher.
9	Safety Evaluation,	Fire Zone 91 - Unit 4 SG Level Instrumentation	Add (Note 2)	Typo - Ref. FPL RAI Response,
	Appendix 1, Page 2	(Wide Range)		dated July 2, 1998
10	Safety Evaluation,	Fire Zone 91 - 120 VAC to 3B Load Sequencer	Fire Zone 92	Typo - Ref. FPL RAI Response,
l	Appendix 1, Page 2			dated July 2, 1998
11	Safety Evaluation,	Fire Zone 91 – MCC3K Power Feeder	Fire Zone 92 – MCC 3K Power	Typo - Ref. FPL RAI Response,
1	Appendix 1, Page 2		Feeder	dated July 2, 1998
12	Safety Evaluation,	Notes: 1. Manual actions may be used to	Addcircuits of NCC Fans 4B and	Typo - Ref. FPL RAI Response,
	Appendix 1, Page 3	overcome adverse fire effects to certain circuits.	4D.	dated July 2, 1998
13	Safety Evaluation,	Fire Zone 80-4k1232 - Unit 4 Instrument Air	Add Isolation Valve - Control	Typo - Ref. FPL Supplemental
	Appendix 2, Page 1	Supply Header Isolation Valve		Information, dated Oct. 27, 1998

No.	Document Reference	Item	Proposed Revision	Basis/Justification
14	Safety Evaluation,	Fire Zone 80 – 4K1421 – Unit 4 Train AFW	AddUnit 4 Train 2 AFW Flow	Typo - Ref. FPL Supplemental
	Appendix 2, Page 1	Flow Control Valve - Control	Control	Information, dated Oct. 27, 1998
15	Safety Evaluation,	Fire Zone 80 – 4K1417 – 125Vdc to Alternative	125Vdc to Alternate Shutdown	Typo - Ref. FPL Supplemental
	Appendix 2, Page 2	Shutdown Panel 4C264		Information, dated Oct. 27, 1998
16	Safety Evaluation,	Fire Zone 82 – 4A1354 PB4863 to PB4865	PB4864 to PB4865	Typo - Ref. FPL Supplemental
	Appendix 2, Page 2			Information, dated Oct. 27, 1998
17	Safety Evaluation,	Fire Zone 82 – 4K1441 – (2 nd) Auxiliary	4K1441 - Startup Transformer	Typo - Ref. FPL Supplemental
	Appendix 2, Page 2	Transformer Breaker Control – 4160 V Bus 4B		Information, dated Oct. 27, 1998
18	Safety Evaluation,	Fire Zone 85 – 3K1966 4160V Switchgear	South Wall to support 7 feet West	Typo - Ref. FPL Supplemental
	Appendix 2, Page 2	Room South Wall to Column E	of Column Line J.	Information, dated Oct. 27, 1998
19	Safety Evaluation,	Fire Zone 88 – 3J2020 From Box Enclosure at	3K2020at Column 24 south to	Typo - Ref. FPL Supplemental
	Appendix 2, Page 2	Column 24 to Support 2 Feet West of Column J	Support 2 Feet	Information, dated Oct. 27, 1998
20	Safety Evaluation,	Fire Zone 88 – 3K2021 From Box Enclosure at	at Column 24 south to Support 2	Typo - Ref. FPL Supplemental
	Appendix 2, Page 3	Column 24 to Support 2 Feet West of Column J	Feet	Information, dated Oct. 27, 1998
21	Safety Evaluation,	Fire Zone 91 – 3K2022 From Box Enclosure at	Fire Zone 88at Column 24 south	Typo - Ref. FPL Supplemental
	Appendix 2, Page 3	Column 24 to Support 2 Feet West of Column J	to Support 2 Feet	Information, dated Oct. 27, 1998
22	Safety Evaluation,	Fire Zone 91 – 4K1441– (2 nd) Auxiliary	4K1441 - Startup Transformer	Typo - Ref. FPL Supplemental
	Appendix 2, Page 3	Transformer Breaker Control – 4160 V Bus 4B		Information, dated Oct. 27, 1998
23	Safety Evaluation,	Fire Zone 91 – 4K1232 – Unit 4 Instrument Air	Isolation Valve - Control	Typo - Ref. FPL Supplemental
	Appendix 2, Page 4	Supply Header Isolation Valve		Information, dated Oct. 27, 1998
24	Safety Evaluation,	Fire Zone 91 – 4K1232 – (2 nd) Unit 4 SG	Delete	Typo - Ref. FPL Supplemental
	Appendix 2, Page 4	Blowdown Flow Control Valve		Information, dated Oct. 27, 1998
25	Safety Evaluation,	Fire Zone 91 – 4K1421 – Unit 4 Train AFW	AddUnit 4 Train 2 AFW Flow	Typo - Ref. FPL Supplemental
	Appendix 2, Page 4	Flow Control Valve - Control	Control	Information, dated Oct. 27, 1998
26	Safety Evaluation,	Fire Zone 91 – 4A1369 – Unit 4 SG Level	Delete	Typo - Ref. FPL Supplemental
	Appendix 2, Page 4	(narrow range) Instrumentation		Information, dated Oct. 27, 1998
27	Safety Evaluation,	Fire Zone 91 – 4A1369 – Unit 4 RCS Pressurizer	RCS Pressure Instrumentation	Typo - Ref. FPL Supplemental
	Appendix 2, Page 4	Instrumentation		Information, dated Oct. 27, 1998
28	Safety Evaluation,	Fire Zone 91 – 4A1370 – 125Vdc to Alternative	125Vdc to Alternate Shutdown	Typo - Ref. FPL Supplemental
	Appendix 2, Page 4	Shutdown Panel 4C264		Information, dated Oct. 27, 1998
29	Safety Evaluation,	Fire Zone 91 – PB4874 – Unit 4 SG Level	Delete	Typo - Ref. FPL Supplemental
	Appendix 2, Page 5	(narrow range) Instrumentation		Information, dated Oct. 27, 1998
30	Safety Evaluation,	Fire Zone 91 - PB4874 - Unit 4 RCS Pressurizer	RCS Pressure Instrumentation	Typo - Ref. FPL Supplemental
	Appendix 2, Page 5	Instrumentation	Î	Information, dated Oct. 27, 1998
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No.	Document Reference	Item	Proposed Revision	Basis/Justification
31	Safety Evaluation,	Fire Zone 91 – 4A1371 – SG Blowdown Flow	Indication at Alternate Shutdown	Typo - Ref. FPL Supplemental
	Appendix 2, Page 5	Control Valve Indication at Auxiliary Shutdown Panel 4C264	Panel	Information, dated Oct. 27, 1998
32	Safety Evaluation, Appendix 2, Page 5	Fire Zone 91 - PB4875 - 125Vdc to Alternative Shutdown Panel 4C264	125Vdc to Alternate Shutdown	Typo – Ref. FPL Supplemental Information, dated Oct. 27, 1998
33	Safety Evaluation, Appendix 2, Page 5	Fire Zone 92 4160V Switchgear Room South Wall to Column Line E	South Wall to support 9'-6" west of Column Line J.	Typo - Ref. FPL Supplemental Information, dated Oct. 27, 1998
34	Safety Evaluation, Appendix 2, Page 5	Fire Zone 92 4160V Switchgear Room South Wall to Column Line E	South Wall to support 7' west of Column Line J.	Typo – Ref. FPL Supplemental Information, dated Oct. 27, 1998
35	Safety Evaluation, Appendix 2, Page 6	Fire Zone 105 – 4K1441 – (2 nd) Auxiliary Transformer Breaker Control – 4160V Bus 4B	4K1441 - Startup Transformer	Typo – Ref. FPL Supplemental Information, dated Oct. 27, 1998
36	Safety Evaluation, Appendix 2, Page 6	Fire Zone 105 – From Switchgear Room South Wall to Column Line E	South Wall to support 9'-6" west of Column Line J.	Typo – Ref. FPL Supplemental Information, dated Oct. 27, 1998
37	Safety Evaluation, Appendix 3, Page 1	(Line Omitted)	Add Unit 4Feedwater Bypass Control Valve	Typo – Ref. FPL RAI Response, dated July 2, 1998
38	Safety Evaluation, Appendix 3, Page 1	Fire Zone 79 – 125Vdc for Feeedwater Bypass Control Valves	for Feedwater Bypass	Typo – Ref. FPL RAI Response, dated July 2, 1998
39	Safety Evaluation, Appendix 3, Page 1	Fire Zone 79 – CCW Pump 4C Control	Add (Note2)	Typo – Ref. FPL RAI Response, dated July 2, 1998
40	Safety Evaluation, Appendix 3, Page 1	Fire Zone 79 – Normal Containment Cooling Fan 4D – Control	Add (Note2)	Typo – Ref. FPL RAI Response, dated July 2, 1998
41	Safety Evaluation, Appendix 3, Page 1	Fire Zone 79 – Normal Containment Cooling Fan 4D 4B Damper Control	Delete 4B	Typo – Ref. FPL RAI Response, dated July 2, 1998
42	Safety Evaluation, Appendix 3, Page 1	Fire Zone 79 – SBO Tie Breaker	SBO Tie Breaker Control	Typo – Ref. FPL RAI Response, dated July 2, 1998
43	Safety Evaluation, Appendix 3, Page 1	Fire Zone 79 – Unit 4 SG Level Instrumentation (Wide Range)	Add (Note 3)	Typo – Ref. FPL RAI Response, dated July 2, 1998
44	Safety Evaluation, Appendix 3, Page 1	Fire Zone 79 – Unit 4 Train B Cold Leg Temperature Instrumentation	Delete Instrumentation	Typo – Ref. FPL RAI Response, dated July 2, 1998
45	Safety Evaluation, Appendix 3, Page 1	Fire Zone 79 – Unit 4 Train B Hot Leg Temperature Instrumentation	Delete Instrumentation	Typo – Ref. FPL RAI Response, dated July 2, 1998
46	Safety Evaluation, Appendix 3, Page 2	Fire Zone 79 – 125Vdc to 480V Load Center 4D	Add (Note 2)	Typo - Ref. FPL RAI Response,
47	Safety Evaluation, Appendix 3, Page 2	Fire Zone 84 – AFW Turbine Trip and Throttle Valve – Control	Add (Note 1)	dated July 2, 1998 Typo – Ref. FPL RAI Response, dated July 2, 1998

No.	Document Reference	Item	Proposed Revision	Basis/Justification
48	Safety Evaluation,	Fire Zone 84 – AFW to SG Control Valve	Add (Note 1)	Typo - Ref. FPL RAI Response,
	Appendix 3, Page 3			dated July 2, 1998
49	Safety Evaluation,	Fire Zone 84 – CCW Pump 4C Breaker Control	Add (Note 2)	Typo - Ref. FPL RAI Response,
	Appendix 3, Page 3			dated July 2, 1998
50	Safety Evaluation,	(Line Omitted)	Add Normal 125Vdc to 4160V Bus	Typo - Ref. FPL RAI Response,
	Appendix 3, Page 3		3B, 4B	dated July 2, 1998
51	Safety Evaluation,	Fire Zone 84 - Boric Acid Transfer Pump 3B -	Add (Note 2)	Typo - Ref. FPL RAI Response,
	Appendix 3, Page 3	Control		dated July 2, 1998
52	Safety Evaluation,	Fire Zone 84 – Unit 3 Hot Leg Charging Isolation	Unit 3 Loop C Hot Leg	Typo - Ref. FPL RAI Response,
	Appendix 3, Page 3	Valve - Control		dated July 2, 1998
53	Safety Evaluation,	Fire Zone 84 – Breaker Control Bus 4B and 4D	Bus 4B to 4D Tie, Bus 3B to 3D	Typo - Ref. FPL RAI Response,
i	Appendix 3, Page 3	Tie, Bus 3B and 3D Tie	Tie	dated July 2, 1998
54	Safety Evaluation,	Fire Zone 84 - 125Vdc to Load Sequencer	Load Sequencer 3B	Typo - Ref. FPL RAI Response,
	Appendix 3, Page 4	<u> </u>		dated July 2, 1998
55	Safety Evaluation,	Fire Zone 84 - 129Vac to ASD panel 3P93 from	Fire Zone 84 – 120Vac to ASD	Typo - Ref. FPL RAI Response,
	Appendix 3, Page 4	Inverters 3C and CS		dated July 2, 1998
56	Safety Evaluation,	Fire Zone 84 - Pressurizer Heater Control Group	Add (Note 2)	Typo - Ref. FPL RAI Response,
	Appendix 3, Page 4	3B11		dated July 2, 1998
57	Safety Evaluation,	Fire Zone 84 - Unit 3 AFW Flow Control Valves	Fire Zone 88 – Unit 3 AFW	Typo - Ref. FPL RAI Response,
	Appendix 3, Page 4	Control	<u> </u>	dated July 2, 1998
58	Safety Evaluation,	Fire Zone 88 - Normal 125 Vdc to 4160 Bus 3D	to 4160 Bus 3B	Typo - Ref. FPL RAI Response,
	Appendix 3, Page 4			dated July 2, 1998
59	Safety Evaluation,	(Line Omitted)	125Vdc to 4160 Bus 3D	Typo - Ref. FPL RAI Response,
	Appendix 3, Page 4		İ .	dated July 2, 1998
60	Safety Evaluation,	Fire Zone 88 - EDG 3B Relaying and Metering	and Metering Indication	Typo - Ref. FPL RAI Response,
1	Appendix 3, Page 4		<u> </u>	dated July 2, 1998
61	Safety Evaluation,	Fire Zone 89 - Unit 3 AFW Flow Control Valves	Add (Note 2)	Typo - Ref. FPL RAI Response,
	Appendix 3, Page 5	- Control	.	dated July 2, 1998
62	Safety Evaluation,	Fire Zone 89 - Normal Containment Cooling Fan	Delete (Note 2)	Typo - Ref. FPL RAI Response,
	Appendix 3, Page 5	3B, 3D - Control (Note 2)		dated July 2, 1998

ATTACHMENT 2 TO L-99-054