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L-99-054

10 CFR Part 50 Appendix R

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

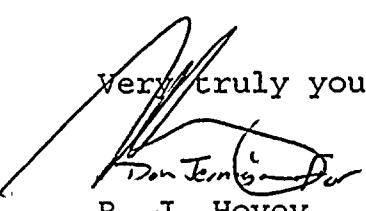
Subject: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Request for Exemption - Fire Rating of
Raceway Fire Barriers in the Open Turbine Building

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.

Very truly yours,


R. J. Hovey
Vice President
Turkey Point Plant

OIH

Attachments

cc: 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 Safety Evaluation, Page 7	E-1	None	Clarification – FPL RAI response, dated July 2, 1998, describes the location for 1-hour rated fire barriers in the Turbine Bldg.
2	Exemption, Page 3 Safety Evaluation Page 3	Column lines E-1 and Jc	column line E-1 and J	Typo – Ref. Safety Evaluation, Page 10, Paragraph 4.b.
3	Safety Evaluation, Page 4, Section 3.2, 1 st Paragraph	“...approximately 100 gallons...in the lube oil conditioners.”	Approximately 1000 gallons...in each lube oil conditioner.	Typo - Ref. FPL Turbine Bldg. Exemption Request, dated July 31, 1997, Page 11.
4	Safety Evaluation, Page 4, Section 3.2, 2 nd Paragraph	“...The above components are protected...”	The auxiliary transformers, hydrogen seal oil units and turbine lube oil transfer skids are protected	Clarification – Ref. FPL RAI response, dated July 2, 1998.
5	Safety Evaluation, Page 6, Table	“Unit 3 Main Condenser”	Unit 3 Main Condenser Area	Typo - Ref. FPL Turbine Bldg. 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 in FPL RAI response, dated July 2, 1998, were preliminary. Final design values are slightly higher.
9	Safety Evaluation, Appendix 1, Page 2	Fire Zone 91 - Unit 4 SG Level Instrumentation (Wide Range)	Add (Note 2)	Typo – Ref. FPL RAI Response, dated July 2, 1998
10	Safety Evaluation, Appendix 1, Page 2	Fire Zone 91 - 120 VAC to 3B Load Sequencer	Fire Zone 92	Typo – Ref. FPL RAI Response, dated July 2, 1998
11	Safety Evaluation, Appendix 1, Page 2	Fire Zone 91 – MCC3K Power Feeder	Fire Zone 92 – MCC 3K Power Feeder	Typo – Ref. FPL RAI Response, dated July 2, 1998
12	Safety Evaluation, Appendix 1, Page 3	Notes: 1. Manual actions may be used to overcome adverse fire effects to certain circuits.	Add ...circuits of NCC Fans 4B and 4D.	Typo – Ref. FPL RAI Response, dated July 2, 1998
13	Safety Evaluation, Appendix 2, Page 1	Fire Zone 80- 4k1232 – Unit 4 Instrument Air Supply Header Isolation Valve	Add ...Isolation Valve –Control	Typo – Ref. FPL Supplemental Information, dated Oct. 27, 1998

No.	Document Reference	Item	Proposed Revision	Basis/Justification
14	Safety Evaluation, Appendix 2, Page 1	Fire Zone 80 – 4K1421 – Unit 4 Train AFW Flow Control Valve - Control	Add...Unit 4 Train 2 AFW Flow Control...	Typo – Ref. FPL Supplemental Information, dated Oct. 27, 1998
15	Safety Evaluation, Appendix 2, Page 2	Fire Zone 80 – 4K1417 – 125Vdc to Alternative Shutdown Panel 4C264	...125Vdc to Alternate Shutdown...	Typo – Ref. FPL Supplemental Information, dated Oct. 27, 1998
16	Safety Evaluation, Appendix 2, Page 2	Fire Zone 82 – 4A1354 ... PB4863 to PB4865	PB4864 to PB4865	Typo – Ref. FPL Supplemental Information, dated Oct. 27, 1998
17	Safety Evaluation, Appendix 2, Page 2	Fire Zone 82 – 4K1441 – (2 nd) Auxiliary Transformer Breaker Control – 4160 V Bus 4B	4K1441 – Startup Transformer...	Typo – Ref. FPL Supplemental Information, dated Oct. 27, 1998
18	Safety Evaluation, Appendix 2, Page 2	Fire Zone 85 – 3K1966 - ... 4160V Switchgear Room South Wall to Column E	...South Wall to support 7 feet West of Column Line J.	Typo – Ref. FPL Supplemental Information, dated Oct. 27, 1998
19	Safety Evaluation, Appendix 2, Page 2	Fire Zone 88 – 3J2020 ... From Box Enclosure at Column 24 to Support 2 Feet West of Column J	3K2020...at Column 24 south to Support 2 Feet...	Typo – Ref. FPL Supplemental Information, dated Oct. 27, 1998
20	Safety Evaluation, Appendix 2, Page 3	Fire Zone 88 – 3K2021... From Box Enclosure at Column 24 to Support 2 Feet West of Column J	...at Column 24 south to Support 2 Feet...	Typo – Ref. FPL Supplemental Information, dated Oct. 27, 1998
21	Safety Evaluation, Appendix 2, Page 3	Fire Zone 91 – 3K2022... From Box Enclosure at Column 24 to Support 2 Feet West of Column J	Fire Zone 88 ...at Column 24 south to Support 2 Feet...	Typo – Ref. FPL Supplemental Information, dated Oct. 27, 1998
22	Safety Evaluation, Appendix 2, Page 3	Fire Zone 91 – 4K1441 – (2 nd) Auxiliary Transformer Breaker Control – 4160 V Bus 4B	4K1441 – Startup Transformer...	Typo – Ref. FPL Supplemental Information, dated Oct. 27, 1998
23	Safety Evaluation, Appendix 2, Page 4	Fire Zone 91 – 4K1232 – Unit 4 Instrument Air Supply Header Isolation Valve	...Isolation Valve – Control	Typo – Ref. FPL Supplemental Information, dated Oct. 27, 1998
24	Safety Evaluation, Appendix 2, Page 4	Fire Zone 91 – 4K1232 – (2 nd) Unit 4 SG Blowdown Flow Control Valve	Delete	Typo – Ref. FPL Supplemental Information, dated Oct. 27, 1998
25	Safety Evaluation, Appendix 2, Page 4	Fire Zone 91 – 4K1421 – Unit 4 Train AFW Flow Control Valve – Control	Add...Unit 4 Train 2 AFW Flow Control...	Typo – Ref. FPL Supplemental Information, dated Oct. 27, 1998
26	Safety Evaluation, Appendix 2, Page 4	Fire Zone 91 – 4A1369 – Unit 4 SG Level (narrow range) Instrumentation	Delete	Typo – Ref. FPL Supplemental Information, dated Oct. 27, 1998
27	Safety Evaluation, Appendix 2, Page 4	Fire Zone 91 – 4A1369 – Unit 4 RCS Pressurizer Instrumentation	...RCS Pressure Instrumentation	Typo – Ref. FPL Supplemental Information, dated Oct. 27, 1998
28	Safety Evaluation, Appendix 2, Page 4	Fire Zone 91 – 4A1370 – 125Vdc to Alternative Shutdown Panel 4C264	...125Vdc to Alternate Shutdown...	Typo – Ref. FPL Supplemental Information, dated Oct. 27, 1998
29	Safety Evaluation, Appendix 2, Page 5	Fire Zone 91 – PB4874 – Unit 4 SG Level (narrow range) Instrumentation	Delete	Typo – Ref. FPL Supplemental Information, dated Oct. 27, 1998
30	Safety Evaluation, Appendix 2, Page 5	Fire Zone 91 – PB4874 – Unit 4 RCS Pressurizer Instrumentation	...RCS Pressure Instrumentation	Typo – Ref. FPL Supplemental Information, dated Oct. 27, 1998

No.	Document Reference	Item	Proposed Revision	Basis/Justification
31	Safety Evaluation, Appendix 2, Page 5	Fire Zone 91 - 4A1371 - SG Blowdown Flow Control Valve Indication at Auxiliary Shutdown Panel 4C264	...Indication at Alternate Shutdown Panel...	Typo - Ref. FPL Supplemental 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 4 Feedwater Bypass Control Valve	Typo - Ref. FPL RAI Response, dated July 2, 1998
38	Safety Evaluation, Appendix 3, Page 1	Fire Zone 79 - 125Vdc for Feedwater 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, dated July 2, 1998
47	Safety Evaluation, Appendix 3, Page 2	Fire Zone 84 - AFW Turbine Trip and Throttle Valve - Control	Add (Note 1)	Typo - Ref. FPL RAI Response, dated July 2, 1998

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

ATTACHMENT 2 TO L-99-054