



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

July 17, 1992

Docket Nos. 50-277
and 50-278

Mr. Dickinson M. Smith
Senior Vice President - Nuclear
Philadelphia Electric Company
Nuclear Group Headquarters
Correspondence Control Desk
P.O. Box 195
Wayne, Pennsylvania 19087-0195

Dear Mr. Smith:

SUBJECT: REQUEST FOR TEMPORARY WAIVER OF COMPLIANCE FROM TECHNICAL
SPECIFICATION 3.14.D.2 AND REQUEST FOR APPROVAL OF EQUIVALENT
TECHNICAL SPECIFICATION MEASURES

This letter confirms that on July 16, 1992, Victor Nerses, as Acting Assistant Director for Region I Reactors, orally granted your request to waive compliance to Technical Specification (TS) 3.14.D.2 as described in your July 17, 1992 letter. The waiver requests to suspend the requirement to have either a continuous fire watch or an hourly fire watch in conjunction with operable fire detection for safe shutdown with inoperable fire barriers as related to the area of the Unit 2 Pipe Tunnel, Room 18.

In response to NRC Bulletin 92-01, "Failure of Thermo-Lag 330 Fire Barriers to Maintain Cabling in Wide Cable Trays and Small Conduits Free From Fire," you reviewed areas of the facility that contained Thermo-Lag 330 material in configurations similar to that described in the Bulletin. While your review was in progress, you took certain compensatory measures including establishment of an hourly fire watch for areas which contained suspect barriers. On July 16, 1992, you declared a number of Thermo-Lag 330 equipped barriers inoperable including a fire barrier in the Unit 2 Pipe Tunnel, Room 18. The barrier in the Pipe Tunnel consists of four conduits encapsulated in a twenty-four inch wide Thermo-Lag cable tray configuration. Two of the conduits contain control cables necessary for safe shutdown capability. The Pipe Tunnel does not have installed fire detection equipment.

Technical Specification 3.14.D.2 requires establishment of a continuous fire watch for areas with inoperable fire barriers without installed detection equipment. Due to high radiation levels in the Pipe Tunnel, you determined that establishment of a continuous fire watch in that area would conflict with ALARA requirements. You proposed to install a series of closed circuit TV (CCTV) cameras in the Pipe Tunnel and establish a fire watch for the area using video monitors located outside the high radiation area. In addition,

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you have indicated that you intend to install temporary fire detection equipment in the Pipe Tunnel with associated alarms in the control room. You state in your request that you will install this equipment in the Pipe Tunnel on July 19, 1992, during a load drop previously scheduled to perform circulating water screen replacements and condenser water box tube testing.

You requested a waiver from the requirement to establish a continuous fire watch in the Unit 2 Pipe Tunnel, Room 18, until July 21, 1992. During the intervening time, you have proposed the following compensatory actions:

- 1) continue hourly fire watch of the Unit 2 Pipe Tunnel,
- 2) minimize transient fire loading in the space,
- 3) brief each oncoming shift fire brigade about the inoperable fire barrier in the Unit 2 Pipe Tunnel,
- 4) conduct fire drills in the area of the Pipe Tunnel by July 17, 1992, and
- 5) stage additional fire fighting equipment outside the Unit 2 Pipe Tunnel.

After careful consideration of your request, the NRC has determined that an exception to the TS 3.14.D.2 fire watch in the area of the Unit 2 Pipe Tunnel, Room 18, would have a negligible effect on plant safety in light of the proposed compensatory actions. The waiver expires at 12:01 a.m. on July 22, 1992.

In addition, the NRC finds that the proposed CCTV system will provide an acceptable means of meeting the TS requirement for a continuous fire watch and that the CCTV in conjunction with temporary fire detection equipment will provide an acceptable basis for invoking the TS requirement for an hourly fire watch in the area of the Unit 2 Pipe Tunnel, Room 18.

Sincerely,

/s/

Jose A. Calvo, Assistant Director
for Region I Reactors
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

cc: See next page

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July 17, 1992

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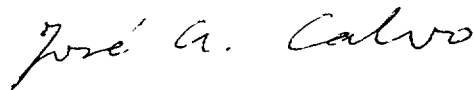
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In addition, the NRC finds that the proposed CCTV system will provide an acceptable means of meeting the TS requirement for a continuous fire watch and that the CCTV in conjunction with temporary fire detection equipment will provide an acceptable basis for invoking the TS requirement for an hourly fire watch in the area of the Unit 2 Pipe Tunnel, Room 18.

Sincerely,



Jose A. Calvo, Assistant Director
for Region I Reactors
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

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