



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

September 2, 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, PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3

This letter confirms that on August 28, 1992, we orally granted your request to waive compliance to Technical Specification (TS) 3.14.D.2 as described in your August 31, 1992 letter. The letter requests to suspend the requirement of TS 3.14.D.2 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 3 Pipe Tunnel, Room 19.

On August 28, 1992, you declared a number of Thermo-Lag 330 equipped fire barriers inoperable including a fire barrier in the Unit 3 Pipe Tunnel, Room 19, based on the information and guidance provided in NRC Bulletin 92-01, Supplement 1, "Failure of Thermo-Lag 330 Fire Barrier System to Perform Its Specified Fire Endurance Function," dated August 26, 1992. The barrier in the pipe tunnel consists of conduit barrier configurations that were outside the guidance provided in Bulletin 92-01, but were determined to be suspect in Bulletin 92-01, Supplement 1. 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 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 closed circuit television (CCTV) camera in the Pipe Tunnel and establish a fire watch for the area using video monitors located outside the high radiation area. You stated in your letter dated August 31, 1992 that you installed the CCTV camera in the Unit 3 Pipe Tunnel on August 28, 1992.

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You requested a waiver from the requirement to establish a continuous fire watch in the Unit 3 Pipe Tunnel, Room 19 until August 29, 1992, at which time you expected to have a CCTV and video monitor installed to serve as a continuous fire watch. During the intervening time you proposed the following compensatory actions:

- 1) minimize transient fire loading in the space,
- 2) brief each oncoming shift fire brigade about the inoperable fire barrier in the Unit 3 Pipe Tunnel,
- 3) that you had conducted fire drills in the area of the Units 2 and 3 Pipe Tunnels on July 17, 1992, and
- 4) that you had staged additional fire fighting outside the Units 2 and 3 Pipe Tunnels.

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 3, Room 19, would have negligible effect on plant safety in light of the proposed compensatory actions.

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 in the area of the Unit 3 Pipe Tunnel, Room 19. Should you subsequently install temporary fire detection in the Unit 3 Pipe Tunnel, with associated alarms in the control room, the NRC would find the CCTV system as an acceptable means of meeting the TS requirement for an hourly fire watch.

The waiver, which we granted orally on August 28, 1992, should be considered to have expired at 0200 on August 29, 1992.

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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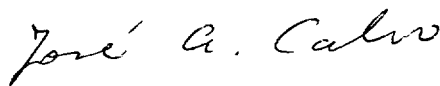
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Sincerely,



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

cc: See next page

Philadelphia Electric Company

Peach Bottom Atomic Power Station,
Units 2 and 3

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