

November 27, 2001

MEMORANDUM TO: Christopher I. Grimes, Director
License Renewal Project Directorate
Division of Reactor Program Management
Office of Nuclear Reactor Regulation

FROM: Eric W. Weiss, Chief **/RA/**
Plant Systems Branch
Division of System Safety and Analysis
Office of Nuclear Reactor Regulation

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR SECTION 2.3.3.31
OF LICENSE RENEWAL APPLICATION FOR SURRY, UNITS 1 & 2,
AND NORTH ANNA, UNITS 1 & 2, REGARDING FIRE PROTECTION
SCOPING (TAC NOs. MB1984, MB1985, MB1986, AND MB1987)

The attached request for additional information (RAI) provides the Plant Systems Branch questions for Section 2.3.3.31, "Fire Protection" of the North Anna Power Station, Units 1 & 2, and Surry Power Station, Units 1 & 2, License Renewal Applications.

Docket Nos.: 50-280 (Surry 1)
50-281 (Surry 2)
50-338 (North Anna 1)
50-339 (North Anna 2)

Attachment: As stated

CONTACT: Paul Lain, SPLB/DSSA/NRR
301-415-2346

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REQUEST FOR ADDITIONAL INFORMATION BY
PLANT SYSTEMS BRANCH
DOMINION OPERATIONS
SURRY POWER STATION, UNITS 1 & 2, AND
NORTH ANNA POWER STATION, UNITS 1 & 2,
LICENSE RENEWAL APPLICATION
DOCKET NOS. 50-280, 50-281, 50-338, AND 50-339

RAI 2.3.3.31-1 In regards to both LRAs, NUREG-1800 includes water based fire protection components within the scoping of AMR. Sprinkler system alarm components, such as retard chambers, pressure switches, orifice plates, and associated piping are typically within the scope of components that require an AMR. These components perform a pressure boundary function during system activation and are made of carbon-steel which is subject to a loss of material as a result of corrosion. These components need to be included within the scope of license renewal and subject to an AMR, or a technical justification is needed for its exclusion.

RAI 2.3.3.31-2 The license renewal rule, 10 CFR 50.54(a)(3), requires an applicant to include those SSCs that are relied on in a safety analysis or plant evaluation to perform a function that demonstrate compliance with 10 CFR 50.48, Fire Protection, to be included within the scope of the license. In addition, operating licenses, in general, contain a license condition for fire protection that defines the 10 CFR 50.48 Fire Protection Program. The license condition states that the licensee "shall implement and maintain in effect the provisions of the approved fire protection program" as described in the Updated Final Safety Analysis Report and/or as approved in an SER. Comparing the applicable information contained in the LRA with the UFSAR and SER, the listed (below) fire protection systems were identified in the UFSAR or SER, but not included within the scope of license renewal. In a discussion with the applicant dated November 19, 2001, the applicant stated that its UFSAR and SER contains FP structures and components that are required not only to meet 10 CFR 50.48 requirements, but other industrial requirements, as well. This distinction is not clear in the UFSAR and SER. Upon considering the staff's request, and reviewing the appropriate documentation, the applicant decided to submit a letter to clarify its CLB consistent with 10 CFR 50.48 and address each of the items listed below in a letter to staff in response to this request for information. The applicant expects to submit this clarification before the end of 2001.

- For NAPS
1. Component Cooling Water Area Sprinkler System
 2. Cooling Tower Deluge System
 3. Fuel Oil Storage Tank Foam System
 4. Water House No. 2 Sprinkler System
 5. Records Room Halon and Sprinkler Systems
 6. Service Building Warehouse Sprinkler System
 7. Service Bldg Cable Vault and Tunnel Carbon Dioxide and Sprinkler Systems
 8. N-16 Instrument Enclosure and N-16 Enclosure Sprinkler Systems
 9. ACC (SBO) Building Sprinkler System
 10. On-line Chemistry Monitoring System Computer Room Sprinkler System
 11. Security Building Sprinkler System

12. Records Storage Building Sprinkler System
13. Training Center Building Sprinkler System
14. Service Water Chemical Addition System Building Sprinkler System
15. Warehouse #2 Sprinkler System

- For SPS
1. Turbine Oil Storage Room Sprinkler System
 2. Fuel Oil Storage Tank Foam System
 3. ACC (SBO) Building Sprinkler System
 4. Station and Chemical Warehouse Sprinkler Systems
 5. On-Line Chemical Monitoring Computer Room Sprinkler System
 6. Construction Clean Change Building Sprinkler System
 7. Training Center Halon & Sprinkler Systems
 8. Security Building Sub-Floor Halon System
 9. Technical Support Center Charcoal Filter Carbon Dioxide System

The applicant also indicated the Surry Rad-Waste Building sprinkler system is in the scope of license renewal, but was not specifically identified within the license application, please verify. In addition, please provide justification for exclusion of the other fire protection systems from the aging management review.