

March 7, 2002

Mr. J. A. Price  
Vice President - Nuclear Technical Services - Millstone  
c/o Mr. David A. Smith  
Dominion Nuclear Connecticut, Inc.  
Rope Ferry Road  
Waterford, CT 06385-0128

SUBJECT: MILLSTONE NUCLEAR POWER STATION, UNIT NO. 3 (MP3) -  
INFORMATION REGARDING CHANGE TO THE FIRE PROTECTION  
PROGRAM

Dear Mr. Price:

By letter dated January 22, 2002, you provided information regarding a change to the fire protection program as it relates to fire suppression in the Cable Spreading Area (CSA) at MP3.

The Nuclear Regulatory Commission (NRC) staff notes that your letter did not request any regulatory action by the NRC. As such we have not conducted a detailed review of the information in your letter. However, from scanning your submittal, we do not believe you have demonstrated that the fire protection program change you are making conforms with your License Condition 2.H "Fire Protection".

The staff notes that General Design Criterion (GDC) 3 of Appendix A to 10 CFR Part 50 requires that fire detection and fighting systems of appropriate capacity and capability shall be provided and designed to minimize the adverse effects of fires on structures, systems, and components important to safety. Title 10 of the *Code of Federal Regulations* Section 50.48(a)(1) requires that each operating nuclear power plant have a fire protection plan that satisfies Criterion 3 of Appendix A to 10 CFR Part 50. As you indicated in your letter, to satisfy these requirements MP3 installed an automatic gaseous fire suppression system and associated fire detection system in the CSA. These automatic systems were supplemented by the plant's existing manual suppression capability. This configuration was reviewed and approved by the NRC during initial plant licensing as an acceptable alternative to the criteria specified in Section C.7.c of BTP CMEB 9.5-1 (included in the Standard Review Plan), which specified that an automatic sprinkler system be provided. The replacement of an automatic fire suppression system with an incipient fire detection system (IFDS), thereby relying solely on manual suppression as the only fire fighting capability in a vital area with a high combustible loading such as the CSA, is not considered to be an acceptable alternative to the criteria specified in Section C.7.c. of BTP CMEB 9.5-1 for satisfying GDC 3 requirements. This conclusion is based on the reduction in the margin of safety provided by the proposed change and the failure of the proposed change to maintain an adequate balance of fire protection defense-in-depth. Therefore, such a change would be considered by the staff to have adversely affected the ability to achieve and maintain safe shutdown in the event of a fire and a noncompliance with the requirements of 10 CFR 50.48(a).

Also, to provide more complete information regarding the staff's approval of the use of IFDS technology at Three Mile Island, No. 1 (TMI), TMI did request regulatory action by submitting a request for an exemption from Appendix R to 10 CFR Part 50. However, the IFDS was not used to replace an existing automatic fire suppression system in their cable spreading room but was provided as an added fire protection system to address Thermo-Lag fire barriers having a 1-hour fire rating located in fire areas where the combustible loading was considered to be low to moderate. The staff notes that as part of that licensing action we denied the licensee's request for an exemption in a fire area where the combustible loading was considered high, similar to the CSA at MP3.

Based on our understanding of your intended fire protection program change from the limited information provided, we would advise that the subject change requires NRC review and approval under your current license condition.

Sincerely,

**/RA/**

Elinor G. Adensam, Director  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-423

cc: See next page

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Elinor G. Adensam, Director  
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 Division of Licensing Project Management  
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