



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

July 23, 1985

Docket No. 50-255
LS05-85-07-029

Mr. David J. Vandewalle
Director, Nuclear Licensing
Consumers Power Company
1945 West Parnall Road
Jackson, Michigan 49201

Dear Mr. Vandewalle:

SUBJECT: EXEMPTIONS TO SECTION III.G OF APPENDIX R

Re: Palisades Plant

By letters dated July 16, 1984, and July 20, 1984, you requested two exemptions from the technical requirements of Section III.G of Appendix R to 10 CFR Part 50 for certain areas inside of containment. By letter dated December 28, 1984 you provided additional information to supplement your exemption requests. By letter dated June 19, 1985, you also requested that we defer our evaluation of your exemption request for the Air Room located inside containment pending completion of your analysis of the relocation of redundant instruments. We will complete our evaluation of the Air Room exemption request in a separate action.

We have completed our review of your submittals requesting an exemption from Section III.G of Appendix R to 10 CFR Part 50 concerning intervening combustibles installed between redundant instrumentation cable trays. Based on our evaluation, we have concluded that the existing fire protection, together with the proposed modifications for the redundant instrumentation cable trays, provides a level of safety equivalent to the technical requirements of Section III.G of Appendix R to 10 CFR Part 50. Therefore, we also conclude that your request for exemption for the existing intervening combustibles between redundant trains should be granted.

The Commission has issued the enclosed Exemption from the above technical requirements of Appendix R to 10 CFR Part 50.

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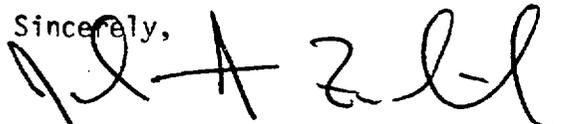
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Mr. David J. Vandewalle

- 2 -

A copy of the Exemption is being forwarded to the Office of the Federal Register for publication.

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Zwolinski". The signature is written in a cursive style with a large initial "J" and "Z".

John A. Zwolinski, Chief
Operating Reactors Branch #5
Division of Licensing

Enclosure:
Exemption

cc w/enclosure
See next page

Mr. David J. Vandewalle

- 2 -

July 23, 1985

A copy of the Exemption is being forwarded to the Office of the Federal Register for publication.

Sincerely,

Kq paubis [unclear]

Original signed by,

John A. Zwolinski, Chief
Operating Reactors Branch #5
Division of Licensing

Enclosure:
Exemption

cc w/enclosure
See next page

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Mr. David J. Vandewalle
Consumers Power Company

Palisades Plant

cc

M. I. Miller, Esquire
Isham, Lincoln & Reale
51st Floor
Three First National Plaza
Chicago, Illinois 60602

Nuclear Facilities and Environmental
Monitoring Section Office
Division of Radiological Health
P. O. Box 30035
Lansing, Michigan 48909

Mr. Thomas A. McNish, Secretary
Consumers Power Company
212 West Michigan Avenue
Jackson, Michigan 49201

Judd L. Bacon, Esquire
Consumers Power Company
212 West Michigan Avenue
Jackson, Michigan 49201

Regional Administrator
Nuclear Regulatory Commission, Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Jerry Sarno
Township Supervisor
Covert Township
36197 M140 Highway
Covert, Michigan 49043

Office of the Governor
Room 1 - Capitol Building
Lansing, Michigan 48913

Palisades Plant
ATTN: Mr. Joseph F. Firlit
General Manager
27780 Blue Star Memorial Hwy.
Covert, Michigan 49043

Resident Inspector
c/o U.S. NRC
Palisades Plant
27782 Blue Star Memorial Hwy.
Covert, Michigan 49043

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of
CONSUMERS POWER COMPANY
(Palisades Plant)

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Docket No. 50-255

EXEMPTION

I.

The Consumers Power Company (CPC, the licensee) is the holder of Provisional Operating License No. DPR-20 which authorizes operation of the Palisades Plant. This license provides, among other things, that it is subject to all rules, regulations and Orders of the Commission now or hereafter in effect.

The facility comprises one pressurized water reactor at the licensee's site located in Van Buren County, Michigan.

II.

On November 19, 1980, the Commission published a revised Section 50.48 and a new Appendix R to 10 CFR Part 50 regarding fire protection features of nuclear power plants. The revised Section 50.48 and Appendix R became effective on February 17, 1981. Section III of Appendix R contains fifteen subsections, lettered A through O, each of which specifies requirements for a particular aspect of the fire protection features at a nuclear power plant. One of these subsections, III.G., is the subject of the licensee's exemption request. Section III.G.2.d. requires separation of cable and equipment and associated non-safety circuits of redundant trains by a

horizontal distance of more than 20 feet with no intervening combustibles or fire hazards.

III.

By letter dated July 20, 1984 the licensee requested an exemption from Section III.G.2.d. of Appendix R inside of containment. The exemption was requested from the requirement to separate redundant trains with no intervening combustibles.

Inside of containment left and right channel cable trays containing redundant instrumentation circuitry are routed such that they enter containment in separate penetration areas and then pass through containment with at least 35 feet of horizontal separation. At one location inside containment two cable trays containing intervening combustibles (i.e., cables) connect the two redundant sets of trays. To prevent a fire from propagating from one redundant cable tray to the other via the intervening combustibles, fire stops have been installed in the intervening cable trays. The design of the fire stops was reviewed and approved by the staff in a supplement to the Appendix A Fire Protection Safety Evaluation dated March 11, 1980. The intervening combustibles and other in-situ combustibles in the area of the redundant cable tray compile a light fuel load. Strict administrative controls limit transient combustibles being brought into containment during operation. Administrative controls also require removal of all transient combustibles from the containment prior to startup. There are no ignition sources in the area of the redundant cable trays. Fire protection inside containment consists of early warning fire detectors installed in areas of cable concentrations, hose reels and portable fire extinguishers.

Due to the light fuel load, separation of the redundant cable trays and the fire stops installed in the intervening cable trays, the staff has reasonable assurance that one train of instrumentation circuits will be free of fire damage for anticipated fires inside containment. The early warning fire detectors will provide rapid detection of fires inside containment. The light fuel load and strict administrative controls on transient combustibles assure that anticipated fires will be limited in size and duration. The separation of the redundant cable trays and the fire stops installed in the intervening cable trays provide adequate passive protection for the redundant circuits prior to the arrival of the fire brigade and their effective extinguishment of the fire. Based on the above evaluation, the staff concludes that the removal of the intervening combustibles between the redundant cable trays would not significantly increase the level of fire protection inside containment. Therefore, the exemption request should be granted.

IV.

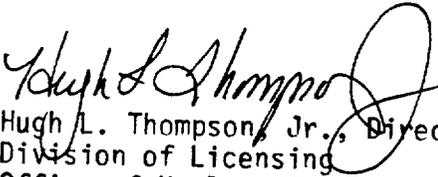
Accordingly, the Commission has determined that, pursuant to 10 CFR 50.12(a), the requested exemption is authorized by law and will not endanger life or property or the common defense and security and is otherwise in the public interest. Therefore, the Commission hereby grants an exemption from the requirements of Section III.G.2.d. of Appendix R to 10 CFR Part 50 to the extent it requires separation of cables and equipment and associated non-safety circuits of redundant trains with no intervening combustibles installed between the redundant cable trays identified in Section III above.

Pursuant to 10 CFR 51.32, the Commission had determined that the granting of this exemption will have no significant impact on the environment (July 5, 1985, 50 FR 27707).

This Exemption is effective upon issuance.

Dated at Bethesda, Maryland, this 23th day of July 1985.

FOR THE NUCLEAR REGULATORY COMMISSION


Hugh L. Thompson, Jr., Director
Division of Licensing
Office of Nuclear Reactor Regulation