PSEG Nuclear LLC P.O Box 236, Hancocks Bridge, New Jersey 08038-0236

OCT 3 1 2002



LR-N02-0374

United States Nuclear Regulatory Commission Attn: Document Control Desk Washington, DC 20555

CHANGE TO COMMITMENTS REGARDING CABLE RACEWAY FIRE WRAP RESOLUTION PLAN SALEM GENERATING STATION UNIT NOS. 1 AND 2 DOCKET NOS. 50-272 AND 50-311

Ladies and Gentlemen:

212

The purpose of this letter is to update our commitment associated with completion of the Electrical Raceway Fire Barrier Project (ERFBP). A portion of this project consisted of a re-evaluation of the Safe Shutdown Analysis (SSA), changes to the Fire Hazards Analysis (FHA), review of Fire Area Boundary evaluations, testing of existing and new electrical raceway fire barrier configurations, and changes to fire pre - plans.

Several major changes were initiated to Salem's fire protection program. These included plant modifications, generation of manual actions and submittal for exemptions from 10 CFR 50 Appendix R.

As documented in letter LR-N02-0084, dated April 19, 2002, PSEG's current commitment for resolution of fire wrap concerns at Salem is as follows, "...the overall schedule for completing plant modifications to resolve the cable fire barrier wrap issue is prior to restart from Salem Unit 1 Refueling Outage 15 in the fall of 2002."

Although significant progress has been made towards completing the installation of modifications to support the fire wrap resolution by the end of 1R15 (currently in progress), not all of the work can be accomplished prior to the end of 1R15 refueling outage. During the re-routing of cables associated with the carbon dioxide system in July 2002, it became apparent that the risk associated with performing the work, warranted additional oversight and other administrative measures. These additional administrative measures while enhancing operational safety, have significantly added to the amount of time required to complete field installations.

A006

The following plant modifications are being performed to support the revised SSA and will be completed prior to November 11, 2002:

- CVCS/BAST Cross-Tie
- Hot Shutdown Panel Cross-Tie
- Modification of PORV Control Circuit
- Vital 230V AC Switchgear/MCC Coordination Modification
- Appendix R Emergency Lighting Units
- Appendix R Cable Re-Routes
- Service Water and Emergency Diesel Generator Circuit Changes
- Appendix R Cold Shutdown Contingencies

The following plant modification will be completed by December 31, 2002:

- Electrical Raceway Fire Barrier Replacement

Additional detail on the above modifications is provided in Attachment 1.

The compensatory measures, in accordance with the Salem Fire Protection Program will be maintained until the modifications are complete.

PSEG is committed to resolve the fire wrap concerns, safely. Therefore PSEG is revising our commitment stated in letter LR-N02-0084 as follows:

"...the overall schedule for completing plant modifications to resolve the cable fire barrier wrap issue is by December 31, 2002."

If you have any questions regarding this submittal, please contact Brian Thomas at 856-339-2022.

Sincerely

John Carlin Vice President – Nuclear Reliability and Technical Support

Mr. H. J. Miller, Regional Administrator
U. S. Nuclear Regulatory Commission – Region I
475 Allendale Road
King of Prussia, PA 19406

U. S. Nuclear Regulatory Commission ATTN: Mr. R. Fretz, Licensing Project Manager – Salem Mail Stop 08B2 Washington, DC 20555

USNRC Senior Resident Inspector – Salem (X24)

Mr. K. Tosch, Manager, IV Bureau of Nuclear Engineering P.O. Box 415 Trenton, NJ 08625

## Attachment 1 LR-N02-0374 Salem Unit 1 and 2 Safe Shutdown Analysis Design Modifications

The design changes are summarized as follows:

. . . •

- CVCS/BAST Cross-Tie – An alternative approach was implemented in lieu of replacing fire wrap in certain areas of the plant. A determination was made that the overall plant safety could be improved, if charging capability is provided independent of the fire area in which the fire occurred. To achieve this goal for certain fire areas, ensuring charging capability independent of the fire area was pursued by cross tying the charging systems between Salem Unit 1 and Unit 2 (*Design Change Package Nos. 80029155 and 80029150*).

An inter-unit crosstie of the CVCS is installed, allowing the use of the positive displacement pump to provide charging system post-fire shutdown functions. Essentially this design establishes a "swap" of the positive displacement pumps located in each Salem unit. The change allows the positive displacement pump in the unaffected (opposite) unit to serve as a charging pump capable of supporting safe shutdown activities of the fire affected unit by providing a source of high pressure borated water following the loss of the fire affected unit's charging system. In addition to providing a means of complying with 10 CFR 50, Appendix R for alternative shutdown for certain fire areas, the modification improves plant flexibility and safety by providing another option of reactor coolant makeup and boration that previously did not exist.

- Hot Shutdown Panel Crosstie As a result of the change in 10 CFR 50, Appendix R compliance in certain plant fire areas, a modification has been installed to provide the Hot Shutdown Panel with power from the opposite unit (*Design Change Package Nos. 80030171 and 80030170*). In addition to providing a means of complying with 10 CFR 50, Appendix R for alternative shutdown for certain fire areas, the modification improves plant flexibility and safety by providing another power supply option for process monitoring that previously did not exist.
- Modification of PORV Control Circuit As a result of discrepancies identified during the course of the safe shutdown re-analysis (LER 272/99-009), modifications have been installed (*Design Change Package Nos.* 80008507 and 80008741) to preclude spurious operation of the pressurizer PORVs for a number of plant fire areas. This proactive modification is considered a significant improvement in fire safety, as the potential for plant transients involving loss of RCS inventory and loss of pressure control is greatly reduced by this modification.

LR-N02-0374

Document Control Desk Attachment 1

مسر ثر\_

 Vital 230V AC Switchgear/MCC Coordination Modification – Previously, cables were protected with fire barrier material to address breaker coordination issues. Subsequent to the re-analysis, new breakers have been installed to resolve coordination concerns. Discrepant conditions were identified at the 230V AC buses. (*Design Change Package Nos. 80008744 and 80008745*).

а I., 14

- Appendix R Emergency Lighting Units Based on the re-analysis, required emergency lighting is being installed. (*Design Change Package Nos. 80023523 and 80030039*). This modification confirms compliance with Section III.J of 10 CFR 50, Appendix R and helps provide better conditions for operators to implement post-fire manual operator actions.
- Appendix R Cable Reroutes Several cable reroutes are being implemented in order to eliminate their susceptibility to fire in Fire Areas 1(2)FA-EP-78C and 1(2)FA-AB-84B (*Design Change Package Nos.* 80029004, 80044617, and 80029003).
- Service Water and Emergency Diesel Generator Circuit Changes Modifications are being performed to DG and Service Water Pump control circuitry to allow the use of offsite power for various fire scenarios without manual operator action and to ensure Service Water Pumps remain available for a fire in Fire Area 1(2)AB-FA-84B (*Design Change Package Nos. 80045583, 80045584*).
- Appendix R Cold Shutdown Contingencies In order to implement cold shutdown repairs and to re-power RHR and CCW pumps from the opposite unit's switchgear, modifications are being performed to facilitate the routing of temporary cables. (*Design Change Package Nos. 80029403* and 80051383).
- Electrical Raceway Fire Barrier Replacement Although much of the raceway fire barrier protection required at the onset of the project is no longer required to meet 10 CFR 50, Appendix R requirements or conditions of an approved exemption, some raceway fire barrier material is being replaced to provide protection of safe shutdown capability in Fire Area 1(2)FA-EP-78C (*Design Change Package Nos. 80020381*, 80031273, 80029445, and 80035776).