From: "Robert L Gill Jr" <rlgill@duke-energy.com>
To: "Rani Franovich" <RLF2@nrc.gov>
Date: 11/7/02 1:23PM
Subject: Re: Response to SER Open Item 2.3.3.19-4

Thank you Rani. We will review and I will get back with you if any further discussion with the staff is appropriate.

"Rani Franovich" <RLF2@nrc.gov> 11/07/2002 10:51 AM
To: <rlgill@duke-energy.com>
cc: "Samson Lee" <SSL1@nrc.gov>, "Tanya Mensah" <TME@nrc.gov>
Subject: Response to SER Open Item 2.3.3.19-4

Hi Bob,
In accordance with your request and as a courtesy, this email is intended to explain why the response to open item 2.3.3.19-4 did not resolve the issue. Because is does not convey a formal staff position (which will be conveyed in the SER), it is not official. Please do not quote this in your official correspondence back to the NRC on this item.

Duke's conclusion for the suppression systems in the outlying plant areas is not currently under debate. However, Duke's response pertaining to manual suppression capability in the turbine building at McGuire and Catawba is problematic. Duke focused its response on the main turbine lubricating oil tank, which Duke states contains the largest volume of combustible fluid in the turbine building. The staff feels that Duke avoided discussion of other potential exposure hazards, choosing instead to focus on the worst case. The staff also feels that Duke has placed total reliance on the three hour fire barrier (and 100 feet of space) by not iincluding the manual hose stations, which provide defense-in-depth, within the scope of license renewal. The guidance in Appendix A to BTP 9.5-1 and CMEB 9.5-1, which was implemented by Duke during original licensing, states in part that "interior manual hose stations should be provided in all buildings, including containment, on all floors." According to letter dated October 7, 1982, Duke implemented this guidance (BTP 9.5.1) at McGuire. Similarly, letter dated November 4, 1983, indicates that Duke implemented this guidance (CMEB 9.5-1) for Catawba.

I suggest your team look again at the SOCs for 10 CFR 50.48. In particular, I would focus on a passage from the November 19, 1980, SOC, FR 76605, Item D. Manual Fire Suppression Technical Basis.

Please let me know if you wish to discuss this further, but be mindful that the staff is preparing its SER and, due to time and resource constraints, may not be able to engage with Duke to resolve this issue until after the SER is issued.
Thanks,