From: Ray Gallucci
To: Phil Qualls
Date: 1/6/04 8:51AM
Subject: Approved Exemptions/Deviations for III.G.2 OpManAx

I'm reviewing the FireDat database to try and find some examples of approved exemptions/deviations to help when I have to respond to the public comments that are coming in. (I'm about halfway through and have found only three, but I may not be focusing on the right words to indicate them.) You said you had identified at least 50. Do you have a list, or can you recreate? I assume only the ones approved for III.G.2 are relevant (I'm finding some in FireDat for other than III.G.2 as well). James, if you can help Phil in recreating the list, please do so.

CC: James Downs

N-34

Exemption Record Input Screen

Exemption #: 8303290263 | 04 | Approval Dat 03/14/1983 | Verified:

Docket Information

DOCKET	NSSS	PLANT
50334	WX	Beaver Valley 1

Requirements/Section Information

SOURCE	SECTION
Appendix R	III.G.2.b.

Description

The pipe tunnel lacks an automatic suppression system and 20 feet of separation free of intervening combustibles between redundant components or alternative shutdown capability.

Rationale

There is approximately 1/2-hour to manually operate the necessary valves if a loss of offsite power occurs; if such a loss does not occur these valves would remain operable.

Because of the time available to take manual control of the backup system, there is reasonable assurance that one train of components will be available for cooling the containment air recirculation coils.

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Exemption Record Input Screen

Exemption #: 8512060395 | 08 | Approval Dat 11/19/1985 | Verified:

Docket Information

DOCKET	NSSS	PLANT
50364	WX	Farley 2, J. M.

Requirements/Section Information

SOURCE	SECTION
Appendix R	III.G.2

Description

Auxiliary Building communication room safe shutdown cables not enclosed by 1-hour rated barrier; multiple hot shorts.

Rationale

In the unlikely event of the multiple hot shorts occurring, this condition can be mitigated by removing power from the transfer relays and manual operation of the effected relay thereby shifting control to the main control board.
By letter dated March 13, 1985, the licensee committed to develop detailed procedures specifically for this fire area covering the manual operator actions required to regain control of one main steam atmospheric relief valve and transfer relays for the pressurizer power operated relief valves

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Exemption Record Input Screen

Exemption #: 8512060395 | 13 | Approval Dat: 11/19/1985 | Verified:

Docket Information

DOCKET	NSSS	PLANT
50364	WX	Farley 2, J. M.

Requirements/Section Information

SOURCE	SECTION
Appendix R	III.G.2

Description

Non-rad side corridor, auxiliary building, redundant train of cables not 1-hour rated barrier enclosed.

Rationale

The licensee committed to develop detailed procedures specifically for this fire area covering the manual operator actions required to regain control of one main steam atmospheric relief valve, the pressurizer power operated relief valves and the transfer relays for the pressurizer power operated relief valves and block valves.
The transoms have been certified by the vendor as being constructed of materials and in a manner similar to that of the UL Class A criteria.

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Exemption Record Input Screen

Exemption #: 8608180061 | 24 | Approval Dat 07/31/1986 | Verified:

Docket Information

DOCKET	NSSS	PLANT
50461	GE	Clinton 1

Requirements/Section Information

SOURCE	SECTION
BTP 9.5-1	C.5.b.(2)

Description

Failure to meet separation criteria in eight fire areas

Rationale

Associated circuits whose fire-induced spurious operation could affect shutdown were identified by a system review to determine those components whose spurious operation could affect shutdown. These spurious operations are to be prevented or terminated by operator actions which are to be contained in the plant emergency operating procedures.
The staff concludes that the applicant has adequately addressed the effects of associated circuit interaction, and that the necessary isolation devices and the actions proposed in emergency

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Exemption Record Input Screen

Exemption #: 8701080637 04 Approval Dat 12/29/1986 Verified:

Docket Information

DOCKET	NSSS	PLANT
50364	WX	Farley 2, J. M.

Requirements/Section Information

SOURCE	SECTION
Appendix R	III.G.2.c.

Description

Unit 2 Auxiliary building, electrical penetration rooms, do not have one redundant train enclosed by 1-hour barrier; automatic fire suppression not installed.

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The licensee, by letter dated March 13, 1985, committed to develop detailed procedures specifically for this fire area covering the manual operator actions to regain charging pump miniflow, establish manual operation of the auxiliary feedwater system, regain control of the pressurizer PORVs, and initiate RCS charging through the boron injection tank. The licensee intends to have these procedures fully implemented by the end of the Unit 2 fourth refueling outage. All other shutdown systems associated with fire area 2-035 have redundant counterparts in other

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Exemption #: 8701080637 | 05 | Approval Dat 12/29/1986 | Verified:

Docket Information

DOCKET	NSSS	PLANT
50364	WX	Farley 2, J. M.

Requirements/Section Information

SOURCE	SECTION
Appendix R	III.G.2.c.

Description

Unit 2 Auxiliary building vertical cable chase requires one redundant train be enclosed by 1-hour barrier.

Rationale

By letter dated March 13, 1985, the licensee committed to develop a detailed procedure specifically for fire area 2-103 which will identify the manual operator actions required to regain the control of the pressurizer PORVs.
All other safe shutdown systems associated with fire area 2-103 have redundant counterparts in other fire areas or are located in plant areas which meet the requirements of 10 CFR 50 Appendix R, Section III.G.2.

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Exemption Record Input Screen

Exemption #: 8701080637 06 Approval Dat 12/29/1986 Verified:

Docket Information

DOCKET	NSSS	PLANT
50364	WX	Farley 2, J. M.

Requirements/Section Information

SOURCE	SECTION
Appendix R	III.G.2.c.

Description

Unit 2 Auxiliary building, electrical penetration (fire area 2-034), requires one train enclosed by 1-hour barrier, installation of automatic fire suppression.

Rationale

The licensee by letter dated March 13, 1985, committed to develop detailed procedures specifically for this fire area covering manual operator actions to regain charging pump mini-flow, establish reactor coolant pump seal injection, isolation of RCS and pressurizer sample lines, control of a main steam atmospheric relief valve, regain control of pressurizer PORV and reactor head vent valves and initiating RCS charging through the boron injection tank. The licensee intends to have these procedures fully implemented by the end of the Unit 2 refueling outage.

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Exemption Record Input Screen

Exemption #: 8701080637 07 Approval Dat 12/29/1986 Verified:

Docket Information

DOCKET	NSSS	PLANT
50348	WX	Farley 1, J. M.

Requirements/Section Information

SOURCE	SECTION
Appendix R	III.G.2

Description

Unit 2 Auxiliary building, fire areas 2-009 and 2-076, require 1 train be enclosed in 1-hour rated barrier; installation of automatic fire detection in and 2-076.

Rationale

Therefore, by letter dated March 13, 1985, the licensee committed to protect one train of control cabling associated with the auxiliary feedwater isolation valves with a equivalent one-hour fire barrier in fire areas 2-009, develop detailed procedures specifically for these fire areas with regard to regaining the control of a pressurizer PORV and isolating the Train B pressurizer PORV, reactor head vent and pressurizer block valves from a hot shot spurious signal. The licensee intends to have the raceway fire barrier installed and the procedures necessary to satisfy the fire effects

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Exemption #: 8701080637 08 Approval Dat 12/29/1986 Verified:

Docket Information

DOCKET	NSSS	PLANT
50364	WX	Farley 2, J. M.

Requirements/Section Information

SOURCE	SECTION
Appendix R	III.G.2.c.

Description

Unit 2 Auxiliary Building, fire area 2-031 requires one train be enclosed in 1-hour rated fire barrier.

Rationale

The licensee, by letter dated March 13, 1985, committed to develop detailed procedures specifically for fire area 2-031 which identify the manual operator actions required to regain control of one main stream atmospheric relief valve and those actions necessary to monitor boron concentration utilizing the RCS sampling system. The licensee intends to have these procedures fully implemented by the end of the Unit 2 fourth refueling outage.
All other shutdown systems associated with fire area 2-031 have redundant counterparts in other

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Exemption #: 9006280105 | 13 | Approval Dat 06/25/1990 | Verified:

Docket Information

DOCKET	NSSS	PLANT
50219	GE	Oyster Creek

Requirements/Section Information

SOURCE	SECTION
Appendix R	III.G.2

Description

480V Switchgear Room does not provide at least one safe shutdown path to maintain hot shutdown free of fire damage without repair.

Rationale

Identified operator actions (1) involve only one minor hot shutdown repair, namely, disconnecting the cable bus tie, (2) can be completed well before any unrecoverable reactor conditions occurs, (3) do not involve any transit through the fire affected zones, and (4) do not require any offsite components or tools. For the above reasons we have determined that with the completion of all the identified operator actions including the minor repair in a timely manner, there is reasonable assurance that hot shutdown can be achieved and maintained following a fire in Fire Zone OB-FZ-

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