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PSEG
Nuclear LLC

APR 1 3 2006

LR-N06-0026

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

10 CFR 50 APPENDIX R EXEMPTION WITHDRAWAL REQUEST
SALEM GENERATING STATION – UNIT 1 AND UNIT 2
DOCKET NOS. 50-272 AND 50-311
FACILITY OPERATING LICENSE NOS. DPR-70 AND DPR-75

By letter dated July 20, 1989, the NRC granted exemptions from the requirements of Appendix R to 10 CFR Part 50 for several fire areas at Salem Units 1 and 2.

Two of these previously granted exemptions are to Section III.G.2 of Appendix R for the Salem Unit 1 and 2 vital switchgear rooms. Appendix R requires the separation of redundant safe shutdown equipment by 1-hour fire-rated barriers and automatic suppression and detection systems. The granted exemption of the redundant safe shutdown systems do not have complete 1-hour fire barriers. The fire suppression system in the 4160V Switchgear room is manually actuated. Changes in plant configuration and subsequent revision to the safe shutdown analysis has changed these fire areas to Section III.G.3. Therefore, the previous exemptions are no longer required.

PSEG LLC (PSEG) is requesting that the previously granted exemption for fire areas 1 (2) FA-AB-64A, 4160V switchgear rooms and fire area 1 (2) FA-AB-84A, 460V switchgear rooms being protected by incomplete 1-hour fire barriers be withdrawn.

It is PSEG's belief that the previously granted exemption for fire areas 1 (2) FA-AB-64A, 4160V switchgear rooms being protected by a manually actuated fire suppression system meets the fixed fire suppression system requirements of Section III.G.3 of Appendix R to 10 CFR Part 50.

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Refer to the enclosed attachment for additional information and justification concerning the exemption withdrawal. If you have any questions regarding this submittal, please contact Mr. Justin Wearne at (856) 339-5081.

Sincerely,

Thomas P. Joyce
Site Vice President
Salem Generating Station

C Mr. S. Collins, Regional Administrator – Region I
U.S. Nuclear Regulatory Commission
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Mr. S. Bailey, Project Manager – Salem/Hope Creek
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Mr. K. Tosch, Manager, IV
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Attachment

LR-N06-0026
WITHDRAWAL OF 10 CFR 50 APPENDIX R EXEMPTIONS

SALEM GENERATING STATION
UNIT NOS. 1 AND 2
FACILITY OPERATING LICENSE NOS. DPR-70 AND DPR-75
DOCKET NOS. 50-272 AND 50-311

WITHDRAWAL OF 10 CFR 50 APPENDIX R EXEMPTIONS

Exemption
Fire Areas 1(2)FA-AB-84A, 460 V Switchgear Room, Exemption No. 6 Exemption from III.G.2
References
PSEG Submittal dated: July 15, 1988 NRC SER dated: July 20, 1989
Statement of Exemption Granted
The basis for the exemption was that cables associated with the A and B division 125V DC Switchgear and the A and B division feeds required to start the Diesel Generators, as well as the power feeds from the "C" Diesel, were enclosed in 1-hour rated fire barriers throughout the areas. Other control cables in these areas were not protected, because alternate shutdown capability existed for those cables. The redundant switchgear was not enclosed within fire barriers, but was instead, protected by partial height, partial length Marinite barriers. A potential fire occurring in either area would be rapidly detected and extinguished by an automatic fire suppression system. The partial Marinite walls and 1-hour rated fire barriers provided protection of the redundant cables and equipment until the fire is extinguished.
Basis for Exemption Withdrawal
The post fire safe shutdown re-analysis established a strategy that complies with the requirements of Section III.G.3 of Appendix R. Cable protection is not required to ensure a safe shutdown capability in fires areas 1(2) FA-AB-84A. Safe shutdown can be accomplished independent of cabling and equipment in these areas. Based on the above information, "460V Switchgear Room (Fire Areas 1 & 2 FA-AB-84A)" – Exemption No. 6 is no longer required and can be withdrawn.

Exemption

Fire Areas 1(2)-FA-AB-64A, 4160 V Switchgear Room, Exemption No. 9

Exemption from III.G.2

References

PSEG Submittal dated: July 15, 1988
NRC SER dated: July 20, 1989

Statement of Exemption Granted

The compliance strategy previously used for these fire areas was based on the requirements of Section III.G.2 of Appendix R to the extent it requires the separation of redundant safe shutdown cables and equipment by 1-hour rated fire barriers plus automatic fire suppression and area wide detection system. Fire Areas 1(2) FA-AB-64A are protected by manually released CO_2 systems. In addition, redundant equipment is separated by partial 1-hour barriers. Exemption No. 9 accepts this plant configuration.

The basis for the exemption was that cables associated with one safe shutdown path would be protected by 1-hour rated fire barriers when the cables leave the protection provided by the partial height Marinite walls. Separation of divisions was maintained by enclosing cables passing through or over opposite division areas. Additionally, intervening combustibles (cables) between redundant switchgear sets were eliminated by enclosing them in 1-hour rated fire barriers. In the event of a postulated fire the detection system would actuate, the Fire Brigade would be notified and the manual fire suppression system would be operated by personnel responding to the fire. The system of Marinite walls and partial 1-hour rated fire barriers will maintain one division free of fire damage until the fire is extinguished.

Basis for Exemption Withdrawal

The post fire safe shutdown re-analysis established this as an Alternate Shutdown area meeting the requirements of Section III.G.3 of Appendix R. Cable protection is no longer required to ensure a safe shutdown capability in fires areas 1(2) FA-AB-64A. Safe shutdown can be accomplished independent of cabling and equipment in these areas. The fixed fire suppression system is a manually actuated suppression system, which meets the requirements of Section III.G.3 as a fixed fire suppression system.

Based on the above information, "4160V Switchgear Room (Fire Areas 1 & 2 FA-AB-64A)" – Exemption No. 9 is no longer required and can be withdrawn.