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SUBJECT: Responds to 901204 ltr re fire protection regulatory bases,
 TVA assures adequate fire protection measures for Bellefonte
 Nuclear Plant.

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MAR 26 1991

U.S. Nuclear Regulatory Commission
ATTN.: Document Control Desk
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Gentlemen:

In the Matter of the Application of)	Docket No. 50-438
Tennessee Valley Authority)	50-439

BELLEFONTE NUCLEAR PLANT (BLN) - TRANSMITTAL OF TVA POSITION REGARDING
FIRE PROTECTION REGULATORY BASES (TAC #79283)

In accordance with TVA's letter to the NRC staff dated December 4, 1990, enclosed for staff review is the TVA position regarding fire protection regulatory bases for BLN. A written staff position on the enclosure is requested by July 1, 1991.

As discussed with NRC staff and management, timely resolution of key issues, such as noted in the enclosure, is important to TVA's consideration of the nuclear option at BLN. Should TVA continue construction of BLN after staff resolution of this and other positions, the agreements reached will be used to govern design, construction, and operation of BLN and will be incorporated into the BLN Final Safety Analysis Report, as appropriate.

Bruce S. Schofield will contact the BLN project manager to schedule working level meetings to assist in the staff's review of these positions. As discussed in our January 17, 1991 meeting with the staff, the first working level meeting will be scheduled approximately 10 days after staff receipt of this document.

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If you have any questions please contact Mr. Schofield at (205) 574-8058.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

Mark Buzynski for
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Enclosure

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BELLEFONTE POSITION PAPER REGARDING
FIRE PROTECTION REGULATORY BASES

PURPOSE

This document describes TVA's approach to assuring adequate fire protection measures for the Bellefonte Nuclear Plant (BLN). TVA requests NRC staff agreement as to the applicable fire protection requirements/guidance for BLN.

BACKGROUND

As described in the Final Safety Analysis Report (FSAR) (Section 9.5.1) and documents referenced in the FSAR, the existing BLN fire protection program and design are based on Appendix A to NRC Branch Technical Position Auxiliary and Power Conversion Systems Branch 9.5-1 (BTP APCS 9.5-1) (1976). A significant portion of the BLN fire protection design and construction effort has been completed based on this guidance and related commitments and agreements.

Since 1985, the NRC has issued significant new fire protection guidance (e.g., Generic Letter 86-10). In view of this and the potential scope of the future construction/rework effort, TVA is undertaking a comprehensive review of fire protection at BLN.

STATEMENT OF POSITION

As the basis for the fire protection program at BLN, TVA will comply with the fire protection regulations contained in General Design Criterion 3 of Appendix A to 10 CFR 50 and 10 CFR 50.48(a) and (e). To demonstrate compliance with these regulations, TVA will:

- o Comply with Appendix A of BTP APCS 9.5-1 (1976) as it applies to plants under construction. Alternatives or exceptions will be noted in submittals to the staff.
- o Comply with Sections III.G, III.J, and III.O of Appendix R to 10 CFR 50 or provide equivalent protection. TVA will also make a comparison of the BLN fire protection program to the remainder of Appendix R.
- o Comply with the National Fire Protection Association codes and other fire protection related codes indicated in the FSAR. The applicable revisions of these codes for use at BLN are listed in Section 9.5.1.1 of the FSAR. Deviations from the specific requirements in each code will be identified and justified in a documented fire protection program.

TVA will revise and submit for NRC staff review Section 9.5.1 of the BLN FSAR and the documented fire protection program. Documentation of the BLN fire protection program will conform to guidance in NRC Generic Letters 86-10 and 88-12. These documents will include BLN fire protection commitments and supporting information such as the code of record (a detailed record of requirements and guidance for the fire protection program), the safe shutdown analysis, the combustible load analysis, administrative and technical controls, organization, and systems and plant features associated with fire protection. These documents will replace and supersede, in their entirety, all previous BLN fire protection submittals and commitments.

JUSTIFICATION

The position outlined above will ensure fire protection capability to protect public health and safety. The use of the existing design basis, supplemented by compliance with Sections III.G, III.J, and III.O of Appendix R, assures continuity in design and construction and is consistent with NRC requirements as well as staff guidance and practice regarding plants of BLN vintage.