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SUBJECT: Provides inforrepschedule for meeting 810220,0603 8 820420 requests for inforre fire protection.Response deadline may be missed by 2 wks to 30 days.

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## Iowa Electric Light and Power Company June 10, 1982 LDR-82-171

LARRY D. ROOT ASSISTANT VICE PRESIDENT OF NUCLEAR DIVISION

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PDR

Mr. Harold Denton, Director Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Washington, DC 20555

Dear Mr. Denton:

The purpose of this letter is to provide you with information regarding our schedule for meeting requests for information concerning fire protection transmitted to us by members of your staff, dated February 20, 1981, June 3, 1981, and April 20, 1982. Although we are making every reasonable effort to provide you the information requested within the period specified, and success has not yet been completely ruled out, the engineers and contractors assigned to this task advise me that our complete submittal to you will probably require two additional weeks and possibly up to thirty days beyond the time period specified in the letter dated April 20, by Mr. Vassallo.

The additional endorsement of the "systems" approach in the April 20th letter improves our ability to respond to your staff's requests for information. Subsequent to a March 4th meeting between Mr. Meyer of Iowa Electric and Mr. Vassallo of your staff, Mr. Meyer was provided a copy of a draft document which indicated the "systems" approach was indeed suitable. Based on the draft document and our anticipation that a formal transmittal of the same document was to be expected we took steps to devote substantial resources to prepare our response to your request for information.

Our approach, corresponding to the "systems" approach, to the issue has changed little since our submittal to you dated March 19, 1981 with its reference to an earlier July 3, 1980 submittal. A straightforward computer manipulation of our electrical cable data base combined with data correlating cable locations with fire zones and data correlating equipment and systems with shutdown functions will provide necessary cable routing information. Engineering review of this information will confirm for us the adequacy of redundant trains where present and the types of modifications necessary to insure compliance with 10 CFR 50 Appendix R. Section III.G.

The potential delay referred to earlier in this letter stems primarily from a more careful examination of fire area boundaries being necessary than originally expected. We have concluded that it may be necessary to request some exemptions from the separation criteria specified in 10 CFR 50 Appendix R, Section III.G. We intend to justify those requests as completely as possible in our submittal as suggested in the April 20th letter.

- A CENTURY OF SERVICE - 1982

General Office • PO. Box 351 • Cedar Rapids, Iowa 52406 • 319/398-4411

Page 2 LDR-82-171 June 10, 1982

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As stated earlier, substantial resources are being dedicated to this task, a clear sense of urgency is present in those individuals responsible for providing the information members of your staff have requested. It is not yet clear we will miss the deadline for a response, however, I wish to advise you of the possibility and likely extent of a delay.

Very truly yours,

Sarry D. Root

Larry Root Assistant Vice President Nuclear Generation

LDR/BL/rh\*

cc: B. Lacy D. Arnold L. Liu S. Tuthill K. Eccleston (NRC) NRC Resident Office REF. Commitment Control 820001