

Docket Nos. 50-263 282/306

MAR 04 1977

Ms. Sandra S. Gardebring  
Executive Director  
Minnesota Pollution Control Agency  
1935 West County Road B2  
Roseville, Minnesota 55113

Dear Ms. Gardebring:

Thank you for your letter of February 10, 1977, with your comments regarding the Northern States Power Company (NSP) requests of January 31, 1977, to amend the Prairie Island and Monticello operating licenses with respect to fire detection and protection systems. Your comments were in regard to (1) detector operability, (2) the detector functionality test schedule and (3) requirement of photo-electric opacity detectors as well as ion detectors.

The amendment requests which generated your comments are part of a complete fire protection review of the NSP nuclear plants. This review was begun with our letter to NSP dated May 11, 1976. Our letter of September 30, 1976, requested that NSP propose Technical Specifications for the existing fire protection system and our letter of December 6, 1976, enclosed sample Technical Specifications to provide guidance. According to our records you should have received copies of our letters. The January 31, 1977 amendment requests are for Technical Specifications on the present fire protection systems in response to our September 30, 1976 letter and are an interim measure until the fire hazards analyses are completed and our staff has reviewed and accepted them. At that time the Technical Specifications will be revised to include the revisions to the fire protection systems that result from the reviews.

In regard to your comments on the NSP amendment request dated January 31, 1977, comments 1 and 2 refer to the proposed interim Technical Specifications on the existing fire protection systems. These proposed Technical Specifications are currently under review. We will be pleased to consider your comments in our review of those proposed interim Technical Specifications. Your comment 3 will be considered as a part of the review of the fire hazards analyses since it represents a change to the existing fire protection system.

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I trust that this reply has been responsive to your comments.

Sincerely,

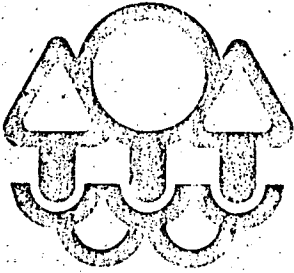
Original signed by:  
Karl R. Goller

Karl R. Goller, Assistant Director  
for Operating Reactors  
Division of Operating Reactors

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# Minnesota Pollution Control Agency

February 10, 1977

Mr. Victor Stello, Director  
Division of Operating Reactors  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Stello:

On January 31, 1977 Northern States Power filed requests to amend the Monticello and Prairie Island licenses to incorporate interim operational and surveillance requirements with respect to fire detection and protection systems. Because both submittals are so very similar, my comments will apply to each except where noted.

The Tech Spec requirement states that N-1 out of N detectors in a zone must be at all times operable. However, many zones are guarded by only one detector. Now admittedly some zones are of lesser importance, but for those zones where fire could more seriously threaten safety systems more than one detector should be required. The Prairie Island cable spreading room falls in this latter category.

The Tech Spec functionability test schedule, every 36 months at Prairie Island and every 12 months at Monticello, appears to be too lenient in view of the few number of detectors in some zones. We do not know what to suggest for more frequent testing, but we do note the Monticello plan to inspect and clean detectors every six months. If dirt and dust accumulation is apt to be a twice yearly problem to the point of requiring cleaning, then there appears to us a possibility for detector impairment due to either the dirt or the cleaning. How dirty may a detector become before impairment is serious? In any event we would think function tests should occur more frequently, perhaps as often as the dirt inspection.

We note that for the most part ion detectors are relied upon to carry the burden of fire detection. We would suggest that in the critical plant zones that the photo-electric opacity detector type be also required.

Sincerely,

*Sandra S. Gardebring*  
Sandra S. Gardebring  
Executive Director