

Attachment A - NEI 04-02 Table B-1 - Transition of Fundamental Fire Protection Program and Design Elements (NFPA 805 Chapter 3)

NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
3.5.11 [Water Supply Yard Main Maintenance Issues]	Means shall be provided to isolate portions of the yard fire main loop for maintenance or repair without simultaneously shutting off the supply to both fixed fire suppression systems and fire hose stations provided for manual backup. Sprinkler systems and manual hose station standpipes shall be connected to the plant fire protection water main so that a single active failure or a crack to the water supply piping to these systems can be isolated so as not to impair both the primary and backup fire suppression systems.	<ul style="list-style-type: none"> • Complies • Complies with use of EEEEs • Complies with clarification 	<p>Complies: Isolating valves with post indicators or curb boxes are installed in the fire protection header so that the entire loop is not disabled should maintenance be required on a small section.</p> <p>Complies with use of EEEEs: Approved valves are not provided at the main riser to branches of hose outlets or at each riser controlling more than two hose stations. Isolation valves are not provided for the Turbine Building hose systems risers and supplies. A review of the system design in "CNP NFPA Code Deviations and Justifications" verified that adequate isolation valves are provided for a majority of the hose risers without adversely impacting the operation of sprinklers protecting safety related equipment.</p> <p>Sectionalizing valves have not been provided for isolating hose station risers from the fire main loop contained within the Turbine and Screen House Buildings. The areas affected include Fire Zones 80, 84, and 142. Justifications for these deviations are found in</p>	<p>UFSAR, Section 9.8.1, "Water Distribution", Item b)</p> <p>CNP "NFPA Code Deviations and Justifications", Rev. 2</p> <p>0120-164-007, "NFPA Code Deviation Evaluation D.C. Cook Units 1 and 2", Rev. 1</p> <p>FPPM, Rev. 11, Table 5.1, Section E.3.(a).</p> <p>Flow Diagram 12-5152 series</p> <p>RFC-12-3003</p>

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			Calculation No. 0120-164-007, "NFPA Code Deviation Evaluation D.C. Cook Units 1 and 2".	
			Complies with clarification: A single pipe break can cause loss of primary (sprinkler) and secondary (hose station) suppression in Fire Zones 28, 30, and 32. However, a yard hydrant and/or a more remote hose station can be used to place a hose stream in service.	
			A single pipe break can cause loss of primary (manual charcoal filter deluge system) and secondary (hose station) suppression in Fire Zones 49 and 50 at elevation 633'. However, a sectionalizing valve in the 6" auxiliary building header allows FHC 64 at elevation 633' to be available for backup.	
			A single pipe break can cause loss of sprinkler protection as well as loss of one or more of the hose stations in Fire Zones 79, 80, 84, 85, 90, 91, and 97. However, one or more of the remaining hose stations in each zone will remain in service despite the worst case pipe break.	

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3.5.12 [Water Supply Compatible Thread Connections]	<p>Threads compatible with those used by local fire departments shall be provided on all hydrants, hose couplings, and standpipe risers.</p> <p><i>Exception: Fire departments shall be permitted to be provided with adapters that allow interconnection between plant equipment and the fire department equipment if adequate training and procedures are provided.</i></p>	• Complies	Threads which are compatible with those used by local fire departments are provided on all hydrants, hose couplings and standpipe risers.	<p>TRP-2070-TAP-400-FPP, "Fire Drills", Rev. 1. Section 3.3.2.c.</p> <p>CNP Fire Pre-Plans, Volumes I, II, and III, Revisions 9, 7, and 12 respectively</p>

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3.5.13 [Water Supply Header Options]	Headers fed from each end shall be permitted inside buildings to supply both sprinkler and standpipe systems, provided steel piping and fittings meeting the requirements of ANSI B31.1, Code for Power Piping, are used for the headers (up to and including the first valve) supplying the sprinkler systems where such headers are part of the seismically analyzed hose standpipe system. Where provided, such headers shall be considered an extension of the yard main system. Each sprinkler and standpipe system shall be equipped with an outside screw and yoke (OS&Y) gate valve or other approved shutoff valve.	<ul style="list-style-type: none"> • Complies • Complies by previous NRC approval 	<p>Complies: Turbine and Auxiliary Building headers are double-end fed. These headers are fed from both ends and piping is CNP type A-31 or S-31. A-31 and S-31 piping is ASME SA-106 Grade B seamless carbon steel or ASME SA-134 welded plate. Each system is equipped with a shutoff valve.</p> <p>Complies by previous NRC approval: The hose stations and standpipes provided for CNP are in accordance with the requirements of BTP 9.5-1, Appendix A for plants which received a construction permit before July 1, 1976. Section E.3.(d) of Appendix A to Branch Technical Position APCSB 9.5-1 on interior manual hose stations does not contain any requirements for hose station operability in the event of an SSE.</p> <p>By the response to Appendix A to Branch Technical Position APCSB 9.5-1 for Units No. 1 and 2, dated January 31, 1977, item E.3.(d) I&M stated:</p> <p><i>"All hose standpipes at Cook Plant are spaced at approximate</i></p>	<p>12-5152 System Drawings</p> <p>ES-PIPE-1000-QCS, "Pipe Material Specification", Rev. 3</p> <p>UFSAR, Section 9.8.1, "Water Distribution", Item d)</p> <p>I&M response to Appendix A to Branch Technical Position APCSB 9.5-1 for Units No. 1 and 2, item E.3.(d)</p> <p>NRC Safety Evaluation supporting Amendment Nos. 31 and 12 to License No. DPR-58 and DPR-74, pages 6-7</p> <p>RFCs 12-2229, 12-2621, 12-2740, 12-2983</p>

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			<p>75 foot intervals in the turbine, office, and auxiliary buildings. Each hose station is provided with a 1-1/2-inch water spray nozzle, a minimum of 75 feet of 1-1/2-inch hose, a 1-1/2-inch angle hose valve, a spanner wrench, a backup 2-1/2-inch angle hose valve, 2-1/2 to 1-1/2-inch reducer and a 1-1/2-inch hose cap.</p> <p>We are proposing to install additional hose station capability at access areas to the control room cable spreading room, the auxiliary cable vault, the switchgear room cable vault, and the containment penetration cable tunnels."</p> <p>The NRC Safety Evaluation, dated July 31, 1979 states:</p> <p>"The standpipe system provides water to hose stations at various locations throughout the facility. The licensees have committed to install additional hose stations and, where necessary, standpipes to satisfy the guidelines of Appendix A to BTP 9.5-1. We have reviewed the proposed additions and find them acceptable.</p> <p>We have reviewed the design criteria and the basis for the</p>	

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			<p>water fire protection system. In certain areas we have required additional protection systems to be installed. We find that the water fire protection system, as modified, meets the guidelines of Appendix A to Branch Technical Position APCSB 9.5-1 and applicable National Fire Protection Association standards and is, therefore, acceptable."</p> <p>The additional protection systems have been installed per the RFCs. The hose station and standpipe configuration, as approved by the SE Report, is still used at CNP. There have been no plant modifications or other changes that would invalidate the basis for approval. This feature remains unchanged.</p>	
3.5.14 [Water Supply Control Valve Supervision]	All fire protection water supply and fire suppression system control valves shall be under a periodic inspection program and shall be supervised by one of the following methods.	• N/A	N/A - Section Heading, see compliance bases below for compliance statements for specific subsections.	N/A

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3.5.14 [Water Supply Control Valve Supervision] (a)	Electrical supervision with audible and visual signals in the main control room or other suitable constantly attended location.	• Complies	Per the Annunciator Plant Procedures, valve positions are inspected on a monthly basis. These procedures also confirm that valves are properly supervised during inspection.	1-OHP-4024-101, "Annunciator #101 Response: Plant Fire System", Rev. 19 1-OHP-4024-102, "Annunciator #102 Response: Miscellaneous Areas Fire System", Rev. 12 2-OHP-4024-201, "Annunciator #201 Response: Plant Fire System", Rev. 21 2-OHP-4024-202, "Annunciator #202 Response: Miscellaneous Areas Fire System", Rev. 13
3.5.14 [Water Supply Control Valve Supervision] (b)	Locking valves in their normal position. Keys shall be made available only to authorized personnel.	• N/A	N/A - The requirements of NFPA 805, Section 3.5.14 are met by the option discussed in Section 3.5.14(a).	N/A
3.5.14 [Water Supply Control Valve Supervision] (c)	Sealing valves in their normal positions. This option shall be utilized only where valves are located within fenced areas or under the direct control of the owner/operator.	• N/A	N/A - The requirements of NFPA 805, Section 3.5.14 are met by the option discussed in Section 3.5.14(a).	N/A

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3.5.15 [Water Supply Hydrant Code Requirements]	<p>Hydrants shall be installed approximately every 250 ft (76 m) apart on the yard main system. A hose house equipped with hose and combination nozzle and other auxiliary equipment specified in NFPA 24, "Standard for the Installation of Private Fire Service Mains and Their Appurtenances," shall be provided at intervals of not more than 1000 ft (305 m) along the yard main system.</p> <p><i>Exception: Mobile means of providing hose and associated equipment, such as hose carts or trucks, shall be permitted in lieu of hose houses. Where provided, such mobile equipment shall be equivalent to the equipment supplied by three hose houses.</i></p>	<ul style="list-style-type: none"> Complies with clarification 	<p>Fire hydrants have been provided at the recommended 250-foot approximate spacing connected to the yard loop header with two exceptions. Hydrants 1 and 14 are located 350' apart in straight line distance and 422' apart in actual travel distance. Hydrants 4 and 7 are located 320' apart in straight line distance and 406' apart in actual travel distance. This configuration is considered adequate given the strength of the water supply and the availability of sufficient hose from the hose houses in the yard.</p> <p>Hose house between hydrants 2 and 7 are located more than 1000 ft apart along the yard main system. However, a fire truck containing equipment equivalent to at least two hose houses is provided for the fire brigade's use.</p> <p>Procedure 2270-066-003 specifies the hose house inventory and confirms that all items required by NFPA 24-1984 are contained within.</p> <p>Procedure 12-FPP-2270-066-005 specifies that the fire truck contains the</p>	<p>FPPM, Rev. 11, Table 5.1, Section E.2.(g)</p> <p>Plant Drawing 12-5260-44, Rev. 44</p> <p>Plant Procedure 12-FPP-2270-066-003, "Monthly Inventory of Fire Hydrant Cabinets", Rev. 2, Attachment 1</p> <p>Plant Procedure 12-FPP-2270-066-005, "Fire Truck Inventory and Operability Test", Rev. 2, Attachment 1</p> <p>NFPA 24-1984, Standard for the Installation of Private Fire Service Mains and Their Appurtenances</p>

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			equipment equivalent to three hose houses.	
3.5.16 [Water Supply Dedicated Limits]	<p>The fire protection water supply system shall be dedicated for fire protection use only.</p> <p><i>Exception No. 1: Fire protection water supply systems shall be permitted to be used to provide backup to nuclear safety systems, provided the fire protection water supply systems are designed and maintained to deliver the combined fire and nuclear safety flow demands for the duration specified by the applicable analysis.</i></p> <p><i>Exception No. 2: Fire protection water storage can be provided by plant systems serving other functions, provided the storage has a dedicated capacity capable of providing the maximum fire protection demand for the specified duration as determined in this section.</i></p>	<ul style="list-style-type: none"> • Submit for NRC Approval 	<p>Per OP-12-5152 series flow diagrams and Section 4.1.2 of the FPPM, the fire protection water supply system is normally dedicated for fire protection use only. Periodically, the fire water supply system is used for non-fire related purposes, and in these cases, the fire protection water supply system is designed and maintained to deliver the combined fire and non-fire flow demands. Justification is documented in Engineering Equivalency Evaluation 11.61, and in accordance with 10CFR50.48(c)(2)(vii) is provided in Attachment L of the Transition Report.</p>	<p>FPPM, Rev. 11, Section 4.1.2</p> <p>OP-12-5152 series Flow Diagrams</p> <p>Engineering Equivalency Evaluation 11.61, "Use of Fire Water for Other Than Fire-Related Purposes", Rev. 0</p>
3.6 Standpipe and Hose Stations	Standpipe and Hose Stations.	<ul style="list-style-type: none"> • N/A 	N/A - Section Heading, see sub-sections for any specific compliance statements	N/A

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3.6.1 [Standpipe and Hose Station Code Requirements]	For all power block buildings, Class III standpipe and hose systems shall be installed in accordance with NFPA 14, "Standard for the Installation of Standpipe, Private Hydrant, and Hose Systems."	<ul style="list-style-type: none"> • Complies with use of EEEEs • Complies by previous NRC approval 	<p>Complies with use of EEEEs: Manual hose stations are located throughout the plant and are designed for either NFPA 14 Class II or Class III service. The hose stations are capable of directing an effective stream to any safety-related area of the plant. The standpipe and hose systems comply with NFPA 14, 1971, 1978, and 1986 Editions, as evaluated in the CNP NFPA 14 Code Compliance Evaluations.</p> <p>Complies by previous NRC approval: Hose stations designed for Class II service are not in direct compliance with this section. However, the standpipe system was previously found to be acceptable by the NRC.</p> <p>By the response to Appendix A to Branch Technical Position APCSB 9.5-1 for Units No. 1 and 2, dated January 31, 1977, item E.3.(d) I&M stated:</p> <p><i>"All hose standpipes at Cook Plant are spaced at approximate 75 foot intervals in the turbine, office, and auxiliary buildings. Each hose station is provided with a 1-1/2-inch water spray nozzle, a minimum of 75 feet of</i></p>	<p>UFSAR, Section 9.8.1, "Water Distribution", Item f)</p> <p>0120-164-003, "NFPA 14 - Code Compliance Verification Checklist D.C. Cook Units 1 and 2", Rev. 1, All Sections</p> <p>09-0120-0123, "NFPA Code Compliance Evaluation Donald C. Cook Nuclear Plant", Rev. 0</p> <p>09-0120-0381, "Extended NFPA Code Compliance Evaluation for the Donald C. Cook Nuclear Plant", Rev. 1</p> <p>0120-108-005, "NFPA 14 - Code Compliance Verification Checklist D.C. Cook Units 1 and 2", Rev. 0, All Sections</p> <p>0120-164-007, "NFPA Code Evaluation Deviation Evaluation D.C. Cook Units 1 and 2", Rev. 1</p> <p>CNP "NFPA Code Deviations and Justifications", Rev. 2</p> <p>I&M response to Appendix A to Branch Technical Position APCSB 9.5-1 for Units No. 1 and 2, 1/31/77, item E.3.(d)</p> <p>NRC Safety Evaluation supporting Amendment Nos. 31 and 12 to License No. DPR-58 and DPR-74,</p>

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			1-1/2-inch hose, a 1-1/2-inch angle hose valve, a spanner wrench, a backup 2-1/2-inch angle hose valve, 2-1/2 to 1-1/2-inch reducer and a 1-1/2-inch hose cap.	7/31/79, pages 6-7 RFCs 12-2229, 12-2621, 12-2740, 12-2983
			We are proposing to install additional hose station capability at access areas to the control room cable spreading room, the auxiliary cable vault, the switchgear room cable vault, and the containment penetration cable tunnels."	
			The NRC Safety Evaluation, dated July 31, 1979 states:	
			"The standpipe system provides water to hose stations at various locations throughout the facility. The licensees have committed to install additional hose stations and, where necessary, standpipes to satisfy the guidelines of Appendix A to BTP 9.5-1. We have reviewed the proposed additions and find them acceptable.	
			We have reviewed the design criteria and the basis for the water fire protection system. In certain areas we have required additional protection systems to be installed. We find that the water fire protection system, as	

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			<p><i>modified, meets the guidelines of Appendix A to Branch Technical Position APCSB 9.5-1 and applicable National Fire Protection Association standards and is, therefore, acceptable."</i></p> <p>The additional protection systems have been installed per the RFCs. The hose station and standpipe configuration, as approved by the SE Report, is still used at CNP. There have been no plant modifications or other changes that would invalidate the basis for approval. This feature remains unchanged.</p>	
3.6.2 [Standpipe and Hose Station Capability Limitations]	A capability shall be provided to ensure an adequate water flow rate and nozzle pressure for all hose stations. This capability includes the provision of hose station pressure reducers where necessary for the safety of plant industrial fire brigade members and off-site fire department personnel.	• Complies with use of EEEEs	Hydraulic calculations have been performed to provide verification of the ability of the existing standpipe system to deliver adequate flow for all hose stations to supply water for fighting fires in accordance with the guidance of NFPA 14.	<p>CNP "NFPA Code Deviations and Justifications", Rev. 2</p> <p>Calculation No. MD-12-FIRE-008-S, Rev. 0</p>

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3.6.3 [Standpipe and Hose Station Nozzle Restrictions]	The proper type of hose nozzle to be supplied to each power block area shall be based on the area fire hazards. The usual combination spray/straight stream nozzle shall not be used in areas where the straight stream can cause unacceptable damage or present an electrical hazard to fire-fighting personnel. Listed electrically safe fixed fog nozzles shall be provided at locations where high-voltage shock hazards exist. All hose nozzles shall have shutoff capability and be able to control water flow from full open to full closed.	<ul style="list-style-type: none"> • Complies with clarification • Complies with Required Action 	<p>Complies with Clarification: The appropriate type of hose nozzle is provided to each power block area. All hose nozzles have shutoff capability and are able to control water flow from full open to full closed.</p> <p>CNP complies with NFPA 14 with exception to size, location and spacing, including hose length, of selected hose stations as documented in CNP report "NFPA Code Deviations and Justifications," Revision 2.</p> <p>Complies with Required Action: Fire Pre-Plans will be revised and subsequent training will be updated to re-enforce use of electrically safe fixed fog nozzles in high voltage settings and use of straight stream nozzles for hydrogen fires. Refer to Implementation Item S-3.10.</p>	<p>12-FPP-4030-066-023, "Test and Inspection of the Plant Fire Hose Standpipe Stations", Rev. 4, All Sections</p> <p>"Donald C. Cook Nuclear Plant NFPA Code Deviations and Justifications", Rev. 2, Section NFPA 14 (Pages 41 thru 51)</p>

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3.6.4 [Standpipe and Hose Station Earthquake Provisions]	Provisions shall be made to supply water at least to standpipes and hose stations for manual fire suppression in all areas containing systems and components needed to perform the nuclear safety functions in the event of a SSE.	<ul style="list-style-type: none"> Complies by previous NRC approval 	<p>By the response to Appendix A to Branch Technical Position APCSB 9.5-1 for Units No. 1 and 2, dated January 31, 1977, item E.3.(d) I&M stated:</p> <p><i>"All hose standpipes at Cook Plant are spaced at approximate 75 foot intervals in the turbine, office, and auxiliary buildings. Each hose station is provided with a 1-1/2-inch water spray nozzle, a minimum of 75 feet of 1-1/2-inch hose, a 1-1/2-inch angle hose valve, a spanner wrench, a backup 2-1/2-inch angle hose valve, 2-1/2 to 1-1/2-inch reducer and a 1-1/2-inch hose cap.</i></p> <p><i>We are proposing to install additional hose station capability at access areas to the control room cable spreading room, the auxiliary cable vault, the switchgear room cable vault, and the containment penetration cable tunnels."</i></p> <p>The NRC Safety Evaluation, dated July 31, 1979 states:</p> <p><i>"The standpipe system provides water to hose stations at various locations throughout the facility. The licensees have committed to install additional hose stations and, where necessary,</i></p>	<p>I&M response to Appendix A to Branch Technical Position APCSB 9.5-1 for Units No. 1 and 2, 1/31/77, item E.3.(d)</p> <p>NRC Safety Evaluation supporting Amendment Nos. 31 and 12 to License No. DPR-58 and DPR-74, 7/31/79, pages 6-7</p> <p>RFCs 12-2229, 12-2621, 12-2740, 12-2983</p>

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			<p><i>standpipes to satisfy the guidelines of Appendix A to BTP 9.5-1. We have reviewed the proposed additions and find them acceptable.</i></p> <p><i>We have reviewed the design criteria and the basis for the water fire protection system. In certain areas we have required additional protection systems to be installed. We find that the water fire protection system, as modified, meets the guidelines of Appendix A to Branch Technical Position APCSB 9.5-1 and applicable National Fire Protection Association standards and is, therefore, acceptable."</i></p> <p>The additional hose station capability has been installed per the RFCs. The hose station and standpipe configuration, as approved by the SE Report, is still used at CNP. There have been no plant modifications or other changes that would invalidate the basis for approval. This feature remains unchanged.</p>	

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3.6.5 [Standpipe and Hose Station Seismic Connection Limitations]	Where the seismic required hose stations are cross-connected to essential seismic non-fire protection water supply systems, the fire flow shall not degrade the essential water system requirement.	<ul style="list-style-type: none"> • N/A 	Hose stations are not cross-connected to non-fire protection water supply systems.	OP-12-5152 Series Flow Diagrams FPPM, Rev. 11, Section 4.1.2
3.7 Fire Extinguishers	Where provided, fire extinguishers of the appropriate number, size, and type shall be provided in accordance with NFPA 10, "Standard for Portable Fire Extinguishers." Extinguishers shall be permitted to be positioned outside of fire areas due to radiological conditions.	<ul style="list-style-type: none"> • Complies with clarification • Complies with use of EEEEs 	<p>Complies with clarification: I&M has committed CNP to comply with NFPA 10, 1984 edition, for portable fire extinguishers. Fire extinguishers are not provided inside containment due to radiological reasons, however, water mist fire extinguishers have been made available outside of containment for use inside containment.</p> <p>Complies with use of EEEEs: The fire extinguishers comply with the requirements of NFPA 10, 1984 Edition, as evaluated in CNP NFPA 10 Code Compliance Evaluations.</p>	<p>FPPM, Rev. 11, Section 14.1</p> <p>09-0120-0123, "NFPA Code Compliance Evaluation Donald C. Cook Nuclear Plant", Rev. 0, 5/16/1988</p> <p>0120-108-001, "NFPA 10 Code Compliance Verification Checklist", Rev. 0, 5/15/1988</p> <p>09-0120-0381, "Extended NFPA Code Compliance Evaluation for the Donald C. Cook Nuclear Plant", Rev. 1, 1/14/1991</p> <p>0120-164-001, "NFPA 10 Code Compliance Verification Checklist", Rev. 1, 1/14/1991</p> <p>"Donald C. Cook Nuclear Plant NFPA Code Deviations and Justifications", Rev. 2, 4/12/06</p> <p>UFSAR, Section 9.8.1, "Inside Plant Portable Equipment", Items b) and c)</p>

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3.8 Fire Alarm and Detection systems	Fire Alarm and Detection Systems.	• N/A	N/A - Section Heading, see sub-sections for any specific compliance statements.	N/A

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3.8.1 Fire Alarm	Alarm initiating devices shall be installed in accordance with NFPA 72, "National Fire Alarm Code®." Alarm annunciation shall allow the proprietary alarm system to transmit fire-related alarms, supervisory signals, and trouble signals to the control room or other constantly attended location from which required notifications and response can be initiated. Personnel assigned to the proprietary alarm station shall be permitted to have other duties. The following fire-related signals shall be transmitted:	<ul style="list-style-type: none"> Complies with use of EEEEs 	<p>Per the FPPM, I&M has committed CNP to comply with NFPA 72D and NFPA 72E for the installation of fire alarm initiating devices. CNP complies with NFPA 72 as evaluated in the CNP NFPA 72D and NFPA 72E Code Compliance Evaluations. Refer to I&M "NFPA Deviations and Recommendations" for NFPA 72D-1967 and NFPA 72E-1974 deviations and justifications.</p> <p>Per the UFSAR, "Fire protection functions are displayed on a comprehensive annunciator panel in the control rooms to alert the operator in case of fire, primary fire pump operation, or fire system malfunction. Pressure gauges on the panel also tell the operator the pressure conditions in the fire protection water piping headers."</p>	<p>FPPM, Rev. 11, Section 14.1</p> <p>UFSAR, Rev. 20, "Fire Protection System", Section 9.8.1, "Miscellaneous Protective Features", Item g</p> <p>CNP "NFPA Code Deviations and Justifications", Rev. 2</p> <p>Engineering Equivalency Evaluation 11.41, "Raised Floors in Control Rooms", Rev. 0</p> <p>09-0120-0123, "NFPA Code Compliance Evaluation Donald C. Cook Nuclear Plant", Rev. 0, 5/16/1988</p> <p>0120-164-005, "NFPA 72D Code Compliance Verification Checklist", Rev. 0, 5/16/88</p> <p>0120-164-006, "NFPA 72E Code Compliance Verification Checklist", Rev. 0, 5/16/88</p> <p>09-0120-0381, "Extended NFPA Code Compliance Evaluation for the Donald C. Cook Nuclear Plant", Rev. 1, 1/14/1991</p> <p>0120-164-005, "NFPA 72D Code Compliance Verification Checklist - Extended", Rev. 0, 12/14/90</p> <p>0120-164-006, "NFPA 72E Code</p>

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
				Compliance Verification Checklist - Extended", Rev. 0, 12/14/90.
3.8.1 Fire Alarm (1)	Actuation of any fire detection device	• Complies	<p>Automatic detection actuation signals are transmitted to the control room. Per the FPPM, automatic fire alarm systems are actuated by detectors that sense fire conditions. Fire alarm detection devices generally transmit signals to the local fire alarm panels and then to the control room annunciators, or, they transmit signals directly to the control room annunciators.</p> <p>All CNP fire detection system alarms sound and are visually displayed on the emergency fire panel in the respective control room.</p>	<p>FPPM, Rev. 11, Section 4.1.1</p> <p>1-OHP-4024-101, "Annunciator #101 Response: Plant Fire System", Rev. 19</p> <p>1-OHP-4024-102, "Annunciator #102 Response: Miscellaneous Areas Fire System", Rev. 12</p> <p>2-OHP-4024-201, "Annunciator #201 Response: Plant Fire System", Rev. 21</p> <p>2-OHP-4024-202, "Annunciator #202 Response: Miscellaneous Areas Fire System", Rev. 13</p>

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
3.8.1 Fire Alarm (2)	Actuation of any fixed fire suppression system	• Complies	<p>The fire suppression system alarm signaling capabilities that may be used involve automatic sprinkler waterflow, CO2 system monitoring and Halon system alarm in the control room upon actuation per the FPPM.</p> <p>All CNP water-using systems; sprinklers, deluge, and standpipes, are instrumented to provide flow indication and to provide audible and visual annunciation in the respective control rooms.</p>	<p>FPPM, Rev. 11, Section 4.1.1</p> <p>UFSAR, Rev. 20, "Fire Protection System", Section 9.8.1.</p> <p>1-OHP-4024-101, "Annunciator #101 Response: Plant Fire System", Rev. 19</p> <p>1-OHP-4024-102, "Annunciator #102 Response: Miscellaneous Areas Fire System", Rev. 12</p> <p>2-OHP-4024-201, "Annunciator #201 Response: Plant Fire System", Rev. 21</p> <p>2-OHP-4024-202, "Annunciator #202 Response: Miscellaneous Areas Fire System", Rev. 13</p>

Attachment A - NEI 04-02 Table B-1 - Transition of Fundamental Fire Protection Program and Design Elements (NFPA 805 Chapter 3)

NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
3.8.1 Fire Alarm (3)	Actuation of any manual fire alarm station	• Complies	Automatic fire alarm systems are actuated through manual pull stations. The systems alarm in the control room upon actuation.	FPPM, Rev. 11, Section 4.1.1 UFSAR, Rev. 20, "Fire Protection System", Section 9.8.1. 1-OHP-4024-101, "Annunciator #101 Response: Plant Fire System", Rev. 19 1-OHP-4024-102, "Annunciator #102 Response: Miscellaneous Areas Fire System", Rev. 12 2-OHP-4024-201, "Annunciator #201 Response: Plant Fire System", Rev. 21 2-OHP-4024-202, "Annunciator #202 Response: Miscellaneous Areas Fire System", Rev. 13

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
3.8.1 Fire Alarm (4)	Starting of any fire pump	• Complies	<p>Per the FPPM, the fire suppression system alarm signaling capabilities include fire pump monitoring. The signals are monitored in the control room.</p> <p>Per the UFSAR, fire protection functions are displayed on a comprehensive annunciator panel in the control rooms to alert the operator in case of fire, primary fire pump operation or fire system malfunction.</p>	<p>FPPM, Rev. 11, Section 4.1.1</p> <p>UFSAR, Rev. 20, "Fire Protection System", Section 9.8.1.</p> <p>1-OHP-4024-101, "Annunciator #101 Response: Plant Fire System", Rev. 19</p> <p>1-OHP-4024-102, "Annunciator #102 Response: Miscellaneous Areas Fire System", Rev. 12</p> <p>2-OHP-4024-201, "Annunciator #201 Response: Plant Fire System", Rev. 21</p> <p>2-OHP-4024-202, "Annunciator #202 Response: Miscellaneous Areas Fire System", Rev. 13</p>

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
3.8.1 Fire Alarm (5)	Actuation of any fire protection supervisory device	<ul style="list-style-type: none"> Complies Complies by previous NRC approval 	<p>Complies: The fire suppression system alarm signaling capabilities include supervisory alarms.</p> <p>Complies by previous NRC approval: Per letter by I&M to NRC dated December 2, 1991:</p> <p><i>"There actually are more than two circuits that are not electronically supervised. These include some water flow, sprinkler alarms, fire detection, and suppression actuation/initiating systems that are not electronically supervised in accordance with NFPA 72D. Justifications for each are outlined in Attachment 3 to this letter."</i></p> <p>The NRC Safety Evaluation dated 1/24/95, Section 3.0 states:</p> <p><i>"Based on the regular testing to confirm operability, the daily monitoring of the alarm panels, the fact the circuits have not experienced integrity problems, and the circuits only provide secondary annunciation of local fire alarms in the control room, the staff finds these additional unsupervised circuits acceptable."</i></p>	<p>FPPM, Rev. 11, Section 4.1.1</p> <p>1-OHP-4024-101, "Annunciator #101 Response: Plant Fire System", Rev. 19</p> <p>1-OHP-4024-102, "Annunciator #102 Response: Miscellaneous Areas Fire System", Rev. 12</p> <p>2-OHP-4024-201, "Annunciator #201 Response: Plant Fire System", Rev. 21</p> <p>2-OHP-4024-202, "Annunciator #202 Response: Miscellaneous Areas Fire System", Rev. 13</p> <p>NRC Safety Evaluation, "Donald C. Cook Nuclear Plant, Unit Nos. 1 and 2 - NFPA Code Review and Related Appendix R SER Clarifications (TAC Nos. M82265 AND M82266)", 1/24/95, Section 3.0</p> <p>Letter from I&M (Fitzpatrick) to the NRC (Murley), "NFPA Code Review and Related Appendix R SER Clarifications" dated 12/2/91, Body of letter and Attachment 3</p>

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
			The unsupervised circuits, as approved by the SE Report, are still used at CNP. There have been no plant modifications or other changes that would invalidate the basis for approval. This approved justification for the unsupervised circuits remains unchanged.	
3.8.1 Fire Alarm (6)	Indication of alarm system trouble condition	• Complies	The emergency fire panel provides annunciation in the associated control room in the event of a trouble signal.	1-OHP-4024-101, "Annunciator #101 Response: Plant Fire System", Rev. 19 1-OHP-4024-102, "Annunciator #102 Response: Miscellaneous Areas Fire System", Rev. 12 2-OHP-4024-201, "Annunciator #201 Response: Plant Fire System", Rev. 21 2-OHP-4024-202, "Annunciator #202 Response: Miscellaneous Areas Fire System", Rev. 13

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
3.8.1.1 [Fire Alarm Communications Requirements]	Means shall be provided to allow a person observing a fire at any location in the plant to quickly and reliably communicate to the control room or other suitable constantly attended location.	<ul style="list-style-type: none"> Complies 	<p>Per Plant Procedure PMP-2270-FRP-001, personnel observing a fire or explosion at any location in the plant are able to communicate quickly with the control room by telephone, PA system, or radio.</p> <p>Per the UFSAR, "The plant is provided with a telephone system, independent of the public address system. The receivers are located in the offices, control rooms and most of the paging stations throughout the plant."</p>	<p>PMP-2270-FRP-001, "Fire Response Plan", Rev. 11, Section 3.1.1.b</p> <p>UFSAR, "Plant Communications", Rev. 20.1, Section 7.7.5,</p>
3.8.1.2 [Fire Alarm Prompt Notification Limits]	Means shall be provided to promptly notify the following of any fire emergency in such a way as to allow them to determine an appropriate course of action:	<ul style="list-style-type: none"> N/A 	N/A - Section Heading, see sub-sections for any specific compliance statements.	N/A

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
3.8.1.2 [Fire Alarm Prompt Notification Limits] (1)	General site population in all occupied areas	• Complies	<p>Per the FPPM, "Plant wide fire sirens can be activated by the control room after a fire condition is confirmed."</p> <p>Per the UFSAR, "The plant fire horn alarm system, consisting of motor-operated horns, is provided throughout the plant to alert personnel of a fire. These horns are distinctly different in sound from the evacuation siren system."</p>	<p>FPPM, Rev. 11, Table 5.1, Section E.1.(b)</p> <p>UFSAR, Rev. 20, "Fire Protection System", "Miscellaneous Protective Features", Section 9.8.1, Item f</p>
3.8.1.2 [Fire Alarm Prompt Notification Limits] (2)	Members of the industrial fire brigade and other groups supporting fire emergency response	• Complies	<p>Per Plant Procedure PMP-2270-FRP-001, the fire brigade is immediately notified during a fire or other emergency. Fire brigade notification of a fire is provided by a site announcement over the Plant Public Address System and through personal electronic pagers.</p> <p>Per the UFSAR, "Manual operation of the plant-wide system is done from the control rooms by the plant operators to signal the plant fire brigade once a fire has been verified."</p>	<p>PMP-2270-FRP-001, "Fire Response Plan", Rev. 11, Section 3.4 and Section 3.7.1</p> <p>UFSAR, Rev. 20, "Fire Protection System", "Miscellaneous Protective Features", Section 9.8.1, Item f</p>

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
3.8.1.2 [Fire Alarm Prompt Notification Limits] (3)	Off-site fire emergency response agencies. Two independent means shall be available (e.g., telephone and radio) for notification of off-site emergency services.	• Complies	<p>Per PMP-2270-FRP-001, when requested, the security department will contact the Berrien County Dispatch Center by calling the offsite emergency number, 911.</p> <p>Per the Fire Pre-Plans, Volume III, Radio communications shall be established between Bridgman and Lake Township Fire Departments and the CNP Fire Brigade Leader immediately upon manning fire stations. Portable radios equipped with CNP Fire Brigade frequencies have been provided to the Lake Township and Bridgman Fire Departments. The CNP Fire Brigade has access to an 800 MHz radio to allow for communications with Berrien County Emergency Response Agencies.</p>	<p>PMP-2270-FRP-001, "Fire Response Plan", Rev. 11, Section 3.2 and Section 3.7.1</p> <p>CNP Fire Pre-Plans, Volume III, Rev. 12, Section 3</p>

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
3.8.2 Detection	If automatic fire detection is required to meet the performance or deterministic requirements of Chapter 4, then these devices shall be installed in accordance with NFPA 72, "National Fire Alarm Code," and its applicable appendixes.	<ul style="list-style-type: none"> Complies with use of EEEEs 	<p>Automatic fire detection systems credited to meet the requirements of NFPA 805 Chapter 4 are identified in the individual Fire Safety Analysis Reports.</p> <p>Per the FPPM, I&M has committed CNP to comply with NFPA 72D and NFPA 72E for the installation of fire alarm initiating devices. CNP complies with NFPA 72 as evaluated in the CNP NFPA 72D and NFPA 72E Code Compliance Evaluations. Refer to I&M "NFPA Deviations and Recommendations" for NFPA 72D-1967 and NFPA 72E-1974 deviations and justifications.</p>	<p>CNP Fire Safety Analysis Reports</p> <p>FPPM, Rev. 11, Section 14.1</p> <p>CNP NFPA Code Deviations and Justifications, Rev. 2</p> <p>09-0120-0123, "NFPA Code Compliance Evaluation Donald C. Cook Nuclear Plant", Rev. 0</p> <p>0120-164-005, "NFPA 72D Code Compliance Verification Checklist", Rev. 0</p> <p>0120-164-006, "NFPA 72E Code Compliance Verification Checklist", Rev. 0</p> <p>09-0120-0381, "Extended NFPA Code Compliance Evaluation for the Donald C. Cook Nuclear Plant", Rev. 1</p> <p>0120-164-005, "NFPA 72D Code Compliance Verification Checklist - Extended", Rev. 0</p> <p>0120-164-006, "NFPA 72E Code Compliance Verification Checklist - Extended", Rev. 0</p>

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
3.9 Automatic and Manual Water-Based Fire Suppression Systems	Automatic and Manual Water-Based Fire Suppression Systems.	• N/A	N/A - Section Heading, see sub-sections for any specific compliance statements.	N/A
3.9.1 [Fire Suppression System Code Requirements]	If an automatic or manual water-based fire suppression system is required to meet the performance or deterministic requirements of Chapter 4, then the system shall be installed in accordance with the appropriate NFPA standards including the following:	• N/A	N/A - Section Heading, see compliance bases below for compliance statements for specific subsections.	N/A

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
3.9.1 [Fire Suppression System Code Requirements] (1)	(1) NFPA 13, "Standard for the Installation of Sprinkler Systems"	<ul style="list-style-type: none"> Complies with use of EEEEs 	<p>Suppression systems credited to meet the requirements of NFPA 805 Chapter 4 are identified in the individual Fire Safety Analysis Reports.</p> <p>The sprinkler systems comply with the requirements of NFPA 13, 1971 and 1983 editions, as evaluated in the CNP NFPA 13 Code Compliance Evaluations.</p>	<p>CNP Fire Safety Analysis Reports</p> <p>FPPM, Rev. 11, Section 14.1</p> <p>09-0120-0381, "Extended NFPA Code Compliance Evaluation for the Donald C. Cook Nuclear Plant", Rev. 1</p> <p>09-0120-0123, "NFPA Code Compliance Evaluation Donald C. Cook Nuclear Plant", Rev. 0</p> <p>0120-108-004, "NFPA 13 - Code Compliance Verification Checklist D.C. Cook Units 1 & 2", Rev. 0</p> <p>0120-164-002, "NFPA 13 - Code Compliance Verification Checklist D.C. Cook Units 1 & 2", Rev. 1</p> <p>0120-164-007, "NFPA Code Evaluation Deviation Evaluation D.C. Cook Units 1 and 2", Rev. 1</p> <p>CNP "NFPA Code Deviations and Justifications", Rev. 2</p> <p>Engineering Equivalency Evaluation 11.41, "Unit 1 Fire Zone 53 (AA46) and Unit 2 Fire Zone 54 (AA47) Boundary Evaluation", Rev. 0</p> <p>Engineering Equivalency Evaluation 12.20, "Unit 1 Turbine Oil Tank Room Fire Zone 95 (AA2A)", Rev. 0</p>

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
				Engineering Equivalency Evaluation 12.22, "Units 1 & 2 Auxiliary Building North and South Elevations 609' Fire Zones 44N (AA36) and 44S (AA42) Analysis of Sprinkler System", Rev. 0
				Engineering Equivalency Evaluation N, "Partial Detection and Suppression Systems for Fire Zone 26 (AA30)", Rev. 0
				Engineering Equivalency Evaluation O, "Partial Detection and Suppression Systems for Fire Zone 11 (AA10)", Rev. 0
				Engineering Equivalency Evaluation P, "Partial Detection and Suppression for Fire Zone 23 (AA29)", Rev. 0

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
3.9.1 [Fire Suppression System Code Requirements] (2)	(2) NFPA 15, "Standard for Water Spray Fixed Systems for Fire Protection"	• Complies with use of EEEEs	<p>Suppression systems credited to meet the requirements of NFPA 805 Chapter 4 are identified in the individual Fire Safety Analysis Reports.</p> <p>CNP complies with NFPA 15, 1973 edition, as evaluated in the CNP NFPA 15 Code Compliance Evaluations.</p>	<p>CNP Fire Safety Analysis Reports</p> <p>FPPM, Rev. 11, Section 14.1</p> <p>09-0120-0381, "Extended NFPA Code Compliance Evaluation for the Donald C. Cook Nuclear Plant", Rev. 1</p> <p>09-0120-0123, "NFPA Code Compliance Evaluation Donald C. Cook Nuclear Plant", Rev. 0</p> <p>0120-108-1375, "NFPA 15 - Code Compliance Verification Checklist D.C. Cook Units 1 & 2", Rev. 0</p> <p>0120-164-004, "NFPA 15 - Code Compliance Verification Checklist D.C. Cook Units 1 & 2", Rev. 1</p> <p>0120-164-007, "NFPA Code Evaluation Deviation Evaluation D.C. Cook Units 1 and 2", Rev. 1</p> <p>CNP "NFPA Code Deviations and Justifications", Rev. 2</p> <p>Engineering Equivalency Evaluation 11.41, "Unit 1 Fire Zone 53 (AA46) and Unit 2 Fire Zone 54 (AA47) Boundary Evaluation", Rev. 0</p> <p>Engineering Equivalency Evaluation 12.20, "Unit 1 Turbine Oil Tank Room Fire Zone 95 (AA2A)", Rev. 0</p>

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
				Engineering Equivalency Evaluation 12.22, "Units 1 & 2 Auxiliary Building North and South Elevations 609' Fire Zones 44N (AA36) and 44S (AA42) Analysis of Sprinkler System", Rev. 0
3.9.1 [Fire Suppression System Code Requirements] (3)	(3) NFPA 750, "Standard on Water Mist Fire Protection Systems"	• N/A	Water mist systems are not installed at Cook Nuclear Plant.	Fire Hazards Analysis, Rev. 14
3.9.1 [Fire Suppression System Code Requirements] (4)	(4) NFPA 16, "Standard for the Installation of Foam-Water Sprinkler and Foam-Water Spray Systems"	• N/A	Foam-water and foam-water spray systems are not installed at Cook Nuclear Plant.	Fire Hazards Analysis, Rev. 14

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
3.9.2 [Fire Suppression System Flow Alarm]	Each system shall be equipped with a water flow alarm.	<ul style="list-style-type: none"> • Complies • Complies with use of EEEEs 	<p>Complies: Fire protection functions are displayed on a comprehensive annunciator panel in the control rooms to alert the operator in case of fire, primary fire pump operation, sprinkler waterflow supervisory alarms, or fire system malfunction. Pressure gauges on the panel also tell the operator the pressure conditions in the fire protection water piping headers.</p> <p>Complies with use of EEEEs: Refer to CNP "NFPA Code Deviations and Justifications" for NFPA 72D-1967 and NFPA 14-1971 for justifications to deviations related to this requirement.</p>	<p>FPPM, Rev. 11, Section 4.1.1</p> <p>UFSAR, Section 9.8.1, "Miscellaneous Protective Features", Item g)</p> <p>1-OHP-4024-101, "Annunciator #101 Response: Plant Fire System", Rev. 19</p> <p>2-OHP-4024-201, "Annunciator #201 Response: Plant Fire System", Rev. 21</p> <p>CNP "NFPA Code Deviations and Justifications", Rev. 2</p>

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
3.9.3 [Fire Suppression system Alarm Locations]	All alarms from fire suppression systems shall annunciate in the control room or other suitable constantly attended location.	<ul style="list-style-type: none"> • Complies • Complies with use of EEEEs 	<p>Complies: Fire protection functions are displayed on a comprehensive annunciator panel in the control rooms to alert the operator in case of fire, primary fire pump operation, sprinkler waterflow supervisory alarms, or fire system malfunction. Pressure gauges on the panel also tell the operator the pressure conditions in the fire protection water piping headers.</p> <p>Complies with use of EEEEs: Refer to CNP "NFPA Code Deviations and Justifications" for NFPA 72D-1967 and NFPA 14-1971 for justifications to deviations related to this requirement.</p>	<p>UFSAR, Section 9.8.1, "Miscellaneous Protective Features", Item g)</p> <p>FPPM, Rev. 11, Section 4.1.1</p> <p>1-OHP-4024-101, "Annunciator #101 Response: Plant Fire System", Rev. 19</p> <p>1-OHP-4024-102, "Annunciator #102 Response: Miscellaneous Areas Fire System", Rev. 12</p> <p>2-OHP-4024-201, "Annunciator #201 Response: Plant Fire System", Rev. 21</p> <p>2-OHP-4024-202, "Annunciator #202 Response: Miscellaneous Areas Fire System", Rev. 13</p> <p>CNP "NFPA Code Deviations and Justifications", Rev. 2</p>
3.9.4 [Fire Suppression System Diesel Pump Sprinkler Protection]	Diesel-driven fire pumps shall be protected by automatic sprinklers.	<ul style="list-style-type: none"> • Complies 	The fire pump house structure is protected by a dry pilot preaction sprinkler system. Sprinklers are provided in each primary fire pump room.	UFSAR, Section 9.8.1, "Fire Pump House Structure"

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
3.9.5 [Fire Suppression System Shutoff Controls]	Each system shall be equipped with an OS&Y gate valve or other approved shutoff valve.	<ul style="list-style-type: none"> • Complies • Complies with use of EEEEs 	<p>Complies: All sprinkler systems are equipped with isolation valves.</p> <p>Complies with use of EEEEs: Non-listed valves are installed in some portion of the fire protection system. These valves have been evaluated to meet the intent of the NFPA requirements by Engineering Equivalency Evaluation 12.26.</p>	<p>Flow Diagrams 5152 Series</p> <p>UFSAR, Section 9.8.1, "Water Distribution", Item d)</p> <p>Engineering Equivalency Evaluation 12.24, "NFPA 24 - Listed Valve Deviation 12-ZMO-400 & 401", Rev. 0</p>
3.9.6 [Fire Suppression System Valve Supervision]	All valves controlling water-based fire suppression systems required to meet the performance or deterministic requirements of Chapter 4 shall be supervised as described in 3.5.14.	<ul style="list-style-type: none"> • Complies with clarification 	Valves are supervised as required. Valve positions are inspected on a monthly basis.	<p>Plant Procedure 12-PPP-4030-066-011, "Fire Protection Valve Lineup Verification", Rev. 3, Section 1.4</p> <p>1-OHP-4024-101, "Annunciator #101 Response: Plant Fire System", Rev. 19</p> <p>1-OHP-4024-102, "Annunciator #102 Response: Miscellaneous Areas Fire System", Rev. 12</p> <p>2-OHP-4024-201, "Annunciator #201 Response: Plant Fire System", Rev. 21</p> <p>2-OHP-4024-202, "Annunciator #202 Response: Miscellaneous Areas Fire System", Rev. 13</p>

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
3.10 Gaseous Fire Suppression Systems	Gaseous Fire Suppression Systems.	• N/A	N/A - Section Heading, see sub-sections for any specific compliance statements.	N/A
3.10.1 [Gaseous Suppression System Code Requirements]	If an automatic total flooding and local application gaseous fire suppression system is required to meet the performance or deterministic requirements of Chapter 4, then the system shall be designed and installed in accordance with the following applicable NFPA codes:	• Complies	Gaseous fire suppression systems credited to meet the requirements of NFPA 805 Chapter 4 are identified in the individual Fire Safety Analysis Reports. These systems are designed and installed in accordance with the applicable NFPA codes, as reviewed in the sub-sections of this element.	CNP Fire Safety Analysis Reports

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
3.10.1 [Gaseous Suppression System Code Requirements] (1)	NFPA 12, "Standard on Carbon Dioxide Extinguishing Systems"	• Complies with use of EEEEs	CO2 extinguishing systems credited to meet the requirements of NFPA 805 Chapter 4 comply with NFPA 12-1968, as evaluated in CNP NFPA Code Compliance Evaluations, and Engineering Equivalency Evaluations.	<p>FPPM, Rev. 11, Section 14.1</p> <p>09-0120-0123, "NFPA Code Compliance Evaluation Donald C. Cook Nuclear Plant", Rev. 0</p> <p>0120-108-002, "NFPA 12 Code Compliance Verification Checklist", Rev. 0</p> <p>"Donald C. Cook Nuclear Plant NFPA Code Deviations and Justifications", Rev. 2</p> <p>Engineering Equivalency Evaluation 12.19, "CO2 Fire Suppression Systems in Fire Zones Containing Concentrations of Cable Insulation (Fire Areas AA7, AA8, AA9, AA10, AA29, AA30, AA31, AA37, AA38, AA39, AA40 AA41, AA43, AA44, AA45, AA48, AA49, AA50, AA51, AA52 and AA53)", Rev. 0</p> <p>Engineering Equivalency Evaluation 12.21, "Analysis of Fire Zones 13, 21, 57, 58, and 59 Lack of CO2 Suppression System Calculations", Rev. 0</p>

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
3.10.1 [Gaseous Suppression System Code Requirements] (2)	NFPA 12A, "Standard on Halon 1301 Fire Extinguishing Systems"	<ul style="list-style-type: none"> Complies with use of Existing Engineering Equivalency Evaluations (EEEEEs) 	Halon 1301 Fire Extinguishing Systems credited to meet the requirements of NFPA 805 Chapter 4 comply with NFPA 12A-1977, as evaluated in CNP NFPA Code Compliance Evaluations and Engineering Equivalency Evaluations.	<p>Fire Protection Program Manual (FPPM), Rev. 11, 9/2/2009, Section 14.1</p> <p>09-0120-0123, "NFPA Code Compliance Evaluation Donald C. Cook Nuclear Plant", Rev. 0, 5/16/1988</p> <p>0120-108-003, "NFPA 12A Code Compliance Verification Checklist", Rev. 0, 5/14/1988</p> <p>"Donald C. Cook Nuclear Plant NFPA Code Deviations and Justifications", Rev. 2, 4/12/06</p> <p>Engineering Equivalency Evaluation 12.23, "Analysis of Fire Zones 57 and 58 Lack of Halon Suppression System Calculations", Rev. 0</p>
3.10.1 [Gaseous Suppression System Code Requirements] (3)	NFPA 2001, "Standard on Clean Agent Fire Extinguishing Systems"	<ul style="list-style-type: none"> N/A 	There are no clean agent fire extinguishing systems required to meet the performance or deterministic requirements of Chapter 4.	N/A

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
3.10.2 [Gaseous Suppression System Alarm Location]	Operation of gaseous fire suppression systems shall annunciate and alarm in the control room or other constantly attended location identified.	• Complies	Operation of all gaseous fire suppression systems annunciate and alarm in the control room.	<p>UFSAR, Section 9.8.1, "Miscellaneous Protection Features", Item g)</p> <p>SD-12-COAUX-100, "System Description for Low Pressure Carbon Dioxide Fire Fighting System" Rev 1, Section 6.1 and 6.2</p> <p>SD-12-HALON-100, "System Description Fire Protection - Halon Systems", Rev. 0, 7/15/1996</p> <p>1-OHP-4024-101, "Annunciator #101 Response: Plant Fire System", Rev. 19</p> <p>1-OHP-4024-102, "Annunciator #102 Response: Miscellaneous Areas Fire System", Rev. 12</p> <p>2-OHP-4024-201, "Annunciator #201 Response: Plant Fire System", Rev. 21</p> <p>2-OHP-4024-202, "Annunciator #202 Response: Miscellaneous Areas Fire System", Rev. 13</p>

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
3.10.3 [Gaseous Suppression System Ventilation Limitations]	Ventilation system design shall take into account prevention from over-pressurization during agent injection, adequate sealing to prevent loss of agent, and confinement of radioactive contaminants.	<ul style="list-style-type: none"> Complies with clarification 	<p>Per Section E.5.(d) of FPPM Design Basis Table 5.1, the Cardox (Cheme-tron) design calculations and pre-op tests have confirmed that offsetting requirements to prevent over-pressurization are satisfied.</p> <p>Per Section 9.8.1 of the UFSAR, "Many of the plant ventilating fans are arranged so that they may be shutdown on actuation of an automatic fire system to prevent spread of fire or smoke or, in the case of CO2 or Halon-protected areas, to retain an extinguishing concentration of the fire fighting agent."</p> <p>Fire areas and fire zones that are protected by CO2 systems have boundary penetrations (i.e., dampers, seismic gaps and openings around cables, conduits and pipes) sealed to ensure retention of the CO2 concentrations. In some fire areas, however, dampers have not been provided for duct work that communicates directly with the plant exterior or that pass through other areas within rated construction boundaries to the plant exterior. For the CO2 systems in these fire areas, concentration tests have been performed that demonstrate that</p>	<p>FPPM, Rev. 11, Section Table 5.1, Section E.5.(d)</p> <p>Fire Hazards Analysis, Rev. 14, Section 3.4.3 and 3.4.4</p> <p>UFSAR, Section 9.8.1, "Miscellaneous Protective Features", item d)</p> <p>FL-15771, Cardox Design Calculations "Low Pressure Carbon Dioxide Flow Calculations"</p> <p>SD-12-HALON-100, "System Description Fire Protection - Halon Systems", Rev. 0, 7/15/1996</p>

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
			the required concentration levels can be maintained without dampers. The affected fire zones in which this situation exists are 40A, 40B, 42A, 45, 46A, 47A and 47B.	
3.10.4 [Gaseous Suppression System Single Failure Limits]	In any area required to be protected by both primary and backup gaseous fire suppression systems, a single active failure or a crack in any pipe in the fire suppression system shall not impair both the primary and backup fire suppression capability.	• N/A	Not Applicable. CNP does not have any areas required to be protected by both primary and backup gaseous fire suppression systems.	None
3.10.5 [Gaseous Suppression System Disarming Controls]	Provisions for locally disarming automatic gaseous suppression systems shall be secured and under strict administrative control.	• Complies	Plant documents ensure that disarming automatic gaseous systems is secured and under strict administrative control.	FPPM, Rev. 11 SD-12-COAUX-100, "System Description for Low Pressure Carbon Dioxide Fire Fighting System" Rev 1, Section 9.2 SD-12-HALON-100, "Fire Protection - Halon Systems", Rev. 0, 7/15/1996
3.10.6 [Gaseous Suppression System CO2 Limitations]	Total flooding carbon dioxide systems shall not be used in normally occupied areas.	• Complies with clarification	The normally occupied areas of the plant are considered to be the general floor areas of the auxiliary and turbine buildings, as well as the control rooms. Total flooding CO2 systems are not used in these areas.	FPPM, Rev. 11, Table 5.1, Section E.3.(d) UFSAR, Section 9.8.1, "Low-Pressure Carbon Dioxide System" Fire Hazards Analysis, Rev. 14, Section 3.4.3

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
3.10.7 [Gaseous Suppression system CO2 Warnings]	Automatic total flooding carbon dioxide systems shall be equipped with an audible pre-discharge alarm and discharge delay sufficient to permit egress of personnel. The carbon dioxide system shall be provided with an odorizer.	• Complies	A discharge delay time with audible alarm is incorporated into each automatic system design to allow personnel time to leave the area. CO2 systems are provided with an odorizer.	Fire Hazards Analysis, Rev. 14, Section 3.4.3 and Section 4.1.7. SD-12-COAUX-100, "System Description for Low Pressure Carbon Dioxide Fire Fighting System", Rev 1, Section 4.13, 4.17 and 6.2
3.10.8 [Gaseous Suppression System CO2 Required Disarming]	Positive mechanical means shall be provided to lock out total flooding carbon dioxide systems during work in the protected space.	• Complies	<p>CO2 systems can be isolated by five different methods. These are:</p> <ul style="list-style-type: none"> • Individual hazard "Detection Isolating Key-Lock Switches. • Grouped hazard "Main Detection Isolating Key-Lock Switches (Master Isolation Switches). • Automatic Isolation (Control Room Cable Vault only). • Header Shutoff Valves. • Tank Shutoff Valves. <p>When entering a CO2 protected area, to assure safety, one of the above methods must be employed to isolate and block an operation of the CO2 system. The method selected is dependent on the length of time the work in the area is expected to take and the nature of the work.</p>	SD-12-COAUX-100, "System Description for Low Pressure Carbon Dioxide Fire Fighting System", Rev 1, Section 9

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
3.10.9 [Gaseous Suppression System Cooling Considerations]	The possibility of secondary thermal shock (cooling) damage shall be considered during the design of any gaseous fire suppression system, but particularly with carbon dioxide.	• Complies	I&M performed a study that took into account "damage to safety-related electrical equipment due to thermal shock caused by gaseous suppression system actuations."	FPPM, Rev. 11, Section 12.1 item (3) Technical Evaluation 12.1, "Fire Suppression Effects Study", Rev. 0
3.10.10 [Gaseous Suppression System Decomposition Issues]	Particular attention shall be given to corrosive characteristics of agent decomposition products on safety systems.	• Complies	Corrosive characteristics of agent decomposition products has been considered.	SD-12-HALON-100, "Fire Protection - Halon Systems", Rev. 0, Section 1
3.11 Passive fire Protection Features	This section shall be used to determine the design and installation requirements for passive protection features. Passive fire protection features include wall, ceiling, and floor assemblies, fire doors, fire dampers, and through fire barrier penetration seals. Passive fire protection features also include electrical raceway fire barrier systems (ERFBS) that are provided to protect cables and electrical components and equipment from the effects of fire.	• N/A	N/A - General Statement; No Technical Requirements.	N/A

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
3.11.1 Building Separation	<p>Each major building within the power block shall be separated from the others by barriers having a designated fire resistance rating of 3 hours or by open space of at least 50 ft (15.2 m) or space that meets the requirements of NFPA 80A, "Recommended Practice for Protection of Buildings from Exterior Fire Exposures."</p> <p><i>Exception: Where a performance-based analysis determines the adequacy of building separation, the requirements of 3.11.1 shall not apply.</i></p>	<ul style="list-style-type: none"> • Complies • Complies with use of EEEEs 	<p>Complies: The Auxiliary Building, Containment Buildings, Service Building, and Turbine Building are separated from other buildings by 3-hour barriers or by greater than 50ft of open space.</p> <p>The Auxiliary Building is adjacent to the Containment Buildings and Turbine Building. The Auxiliary Building is separated from the Containment Buildings and Turbine Building by a reinforced concrete wall with a 3 hour rated design. Openings are rated or have been evaluated as equivalent or adequate for the hazard.</p> <p>The Containment Buildings are adjacent to the Auxiliary Building. The Containment Buildings are separated from the Auxiliary Building by a reinforced concrete wall with a 3 hour rated design. Openings are rated or discussed with individual Fire Safety Analyses Reports.</p> <p>The Service Building is adjacent to the Turbine Building. The Service Building is separated from the Turbine Building by a reinforced concrete wall with a 3 hour rated design. Openings are</p>	<p>FPPM, Rev. 11, Table 5.1, Section D, "General Guidelines for Plant Protection"</p> <p>CNP Fire Safety Analyses Reports, Rev. 0</p> <p>Fire Hazards Analysis, Rev. 14</p> <p>Engineering Equivalency Evaluation 9.39, "Fire Zone 70 (AA57A) to Fire Zone 129 (AA2A) Boundary Evaluation", Rev. 0</p> <p>Engineering Equivalency Evaluation 11.46, "Seismic Gaps Between the Containment and Auxiliary Buildings Boundary Evaluation (Fire Areas AA2A, AA2B, AA3, AA7, AA8, AA9, AA10, AA11, AA27, AA29, AA30, AA31, AA34, AA35, AA37 and AA38)", Rev. 0</p> <p>Engineering Equivalency Evaluation 11.54, "Unit 1 Main Control Room Cable Vault Penetration Seal W5111 Fire Zone 57 and 91 (Fire Areas AA50 and AA2A)", Rev. 0</p> <p>Engineering Equivalency Evaluation 11.65, "Fire Door Closure Evaluation (Fire Areas AA2, AA7, AA8, AA14, AA15, AA23, AA24, AA30, AA31, AA34, AA35, AA36/42, AA37, AA38, AA39, AA41, AA43, AA44, AA45, AA48, and AA53)", Rev. 0</p>

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
			rated or discussed with individual Fire Safety Analyses Reports.	
			The Turbine Building is adjacent to the Auxiliary Building and the Service Building. The Turbine Building is separated from the Auxiliary Building and Service Building by a reinforced concrete wall with a 3 hour rated design. Openings are rated or discussed with individual Fire Safety Analyses Reports.	
			Complies with use of EEEEs: A seismic gap exists around the Containment Buildings that provides an opening of approximately 6 in. between the Containment Buildings and the walls, ceilings and floors of the structures immediately adjacent to containment. This opening has been determined adequate by an engineering evaluation. CNP currently utilizes the exception to Section 3.11.1, which is endorsed.	

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
3.11.2 Fire Barriers	Fire barriers required by Chapter 4 shall include a specific fire-resistance rating. Fire barriers shall be designed and installed to meet the specific fire resistance rating using assemblies qualified by fire tests. The qualification fire tests shall be in accordance with NFPA 251, "Standard Methods of Tests of Fire Endurance of Building Construction and Materials," or ASTM E 119, "Standard Test Methods for Fire Tests of Building Construction and Materials."	<ul style="list-style-type: none"> • Complies • Complies with use of EEEEs 	<p>Complies: Fire barriers required by Chapter 4 are identified in the individual Fire Safety Analysis Reports. A specific fire-resistance rating for all fire barriers is included</p> <p>All walls, floors, and ceilings separating fire areas are either reinforced concrete construction which exceed a 3 hour fire rating, or are of concrete block construction with a 3 hour fire resistance rating or have been evaluated as equivalent or adequate for the hazard. The design and installation of fire barriers meets the requirements of ASTM E 119. All openings for cable, pipe, and ductwork in walls, floor, and ceilings separating fire areas have been sealed with foamed in place silicone which was tested for up to five hours fire exposure in an ASTM E 119 wall fire test. Cable tray openings have been sealed and verified by ASTM E 119 tests.</p> <p>Complies with use of EEEEs: Each barrier which contained a feature with an unrated component was analyzed with respect to its fire suppression and detection systems, proximity to safe-shutdown equipment,</p>	<p>CNP Fire Safety Analysis Reports, Rev. 0</p> <p>Fire Hazards Analysis, Rev. 14</p> <p>12-FPP-4030-066-025, "Inspection of Fire Rated Assemblies", Rev. 0</p> <p>FPPM, Rev. 11, Table 5.1, Section D, "General Guidelines for Plant Protection"</p> <p>Engineering Equivalency Evaluation 11.7, "Fire Zone 5 (AA5/6) to Unit 1 Fire Zones 62A, 62B and 62C (AA54) and Unit 2 Fire Zones 63A, 63B and 63C (AA5) Removable Block Walls", Rev. 0</p> <p>Engineering Equivalency Evaluation 11.9, "Turbine, Auxiliary and Containment Buildings Boundary Evaluation", Rev. 0</p> <p>Engineering Equivalency Evaluation 11.11, "Storage of Flammable Gases in Fire Areas AA2A, AA2B, AA3 and AA34", Rev. 0</p> <p>Engineering Equivalency Evaluation 11.12, "Stairwells and Elevator Construction Boundary Evaluations (Fire Areas AA1, AA2A, AA2B, AA3, AA5/6, AA36 and AA42)", Rev. 0</p> <p>Engineering Equivalency Evaluation 11.18, "Radwaste Areas in Fire Zones</p>

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
			and the impact that the unrated portion of the fire barrier could have on safe-shutdown capability. These barriers which contained unrated components have been evaluated as equivalent or adequate for the hazard.	3, 31 and 32 (AA3) Boundary Evaluation", Rev. 0 Engineering Equivalency Evaluation 11.36, "Unit 1 and 2 Hot Shutdown Panel Enclosure: Unit 1 Fire Zone 144 (AA50) and Unit Fire Zone 145 (AA51)", Rev. 0 Engineering Equivalency Evaluation 11.38, "Fire Protection Pump House (Fire Area YD)", Rev. 0 Engineering Equivalency Evaluation 11.39, "Fireproofing for the West Motor Driven Auxiliary Feedwater Pump Enclosures Fire Zones 17A (AA16), 17B (AA17), 80 (AA2A) and 84 (AA2B)", Rev. 0 Engineering Equivalency Evaluation 11.41, "Unit 1 Fire Zone 53 (AA46) and Unit 2 Fire Zone 54 (AA47) Boundary Evaluation", Rev. 0 Engineering Equivalency Evaluation 11.44, "Expansion of Fire Zone 33 and 146 and Unrated Fire Doors (361 and 362) Fire Zones 32, 33 and 34 (Fire Areas AA3, AA34 and AA35)", Rev. 0 Engineering Equivalency Evaluation 11.51, "Screenhouse and Water Intake System Boundary Evaluation Fire Zone 142 (AA2A) to Fire Zone 143 (YD)", Rev. 0

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
				Engineering Equivalency Evaluation 11.66, "Yard (YD) to Fire Zone 19 (AA24) Boundary Evaluation", Rev. 0
				Engineering Equivalency Evaluation 12.11, "Structural Steel Evaluations in Fire Areas AA2A, AA2B, AA3, AA34, AA35, AA56 and AA58", Rev. 0
				Engineering Equivalency Evaluation 12.16, "Radiant Heat Shields for Fire Area AA58", Rev. 0

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
3.11.3 Fire Barrier Penetrations	<p>Penetrations in fire barriers shall be provided with listed fire-rated door assemblies or listed rated fire dampers having a fire resistance rating consistent with the designated fire resistance rating of the barrier as determined by the performance requirements established by Chapter 4. (See 3.11.3.4 for penetration seals for through penetration fire stops.)</p> <p><i>Exception: Where fire area boundaries are not wall-to-wall, floor-to-ceiling boundaries with all penetrations sealed to the fire rating required of the boundaries, a performance-based analysis shall be required to assess the adequacy of fire barrier forming the fire boundary to determine if the barrier will withstand the fire effects of the hazards in the area. Openings in fire barriers shall be permitted to be protected by other means as acceptable to the AHJ.</i></p>	<ul style="list-style-type: none"> • Complies • Complies with use of EEEEs 	<p>Complies: In general, fire-rated door assemblies or listed rated fire dampers having the fire resistance rating consistent with the fire resistance rating of the fire barrier are provided. Fire-rated assemblies which include fire-rated doors and fire dampers required by Chapter 4 are outlined in the CNP individual Fire Safety Analyses Reports.</p> <p>Complies with use of EEEEs: Where fire-rated door assemblies or listed rated fire dampers are not provided with the fire resistance rating consistent with the fire resistance rating of the fire barrier (e.g. hatches, water curtains, manways, etc.), the assemblies have been evaluated to be equivalent or adequate for the hazard.</p>	<p>CNP Fire Safety Analyses Reports, Rev. 0</p> <p>Basis documentation for Engineering Equivalency Evaluations is listed in 3.11.3(1) through 3.11.3(3)</p>

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
3.11.3 [NFPA 80 - Fire Door and Window Requirements] (1)	<p>Passive fire protection devices such as doors and dampers shall conform with the following NFPA standards, as applicable:</p> <p>(1) NFPA 80, "Standard for Fire Doors and Fire Windows"</p>	<ul style="list-style-type: none"> • Complies with clarification • Complies by previous NRC approval • Complies with use of EEEEs 	<p>Complies with clarification: All doors are UL Class A (3 hour) fire rating or a UL Class B (1-1/2 hour) rating to be commensurate with the severity of the hazard as determined by the performance requirements established by Chapter 4 of NFPA 805. Per the FPPM, I&M has committed CNP to comply with NFPA 80. Modifications to rated fire doors are made in accordance with NFPA 80 in order to ensure that the fire protection features of the door are not degraded.</p> <p>Fire rated doors that are designed to be left in the open position, if desired, are provided with self-closing hardware which, when activated by exposure to the heat of a fire, allows the door to close.</p> <p>Complies by previous NRC approval: During the review for compliance with Appendix A to BTP 9.5-1, the NRC identified concerns relating to the installation placement and rating of fire doors at CNP. I&M committed to upgrading affected fire doors and per the NRC Safety Evaluation, dated July 31, 1979, which states:</p>	<p>FPPM, Rev. 11, Section 14.4.2</p> <p>NRC Safety Evaluation supporting Amendment Nos. 31 and 12 to License No. DPR-58 and DPR-74, 7/31/79, page 13, Other Items Relating to the Station Fire Protection Program, item B</p> <p>I&M Letter "Request for Approval and Exemptions", dated March 31, 1983, Section 7.2.6</p> <p>NRC Safety Evaluation "Donald C. Cook Nuclear Power Plant, Unit Nos. 1 and 2 Fire Protection – Request for Exemption from Requirements of Appendix R to 10 CFR 50, Section III.G and III.O", 12/23/83, page 5, Section 4.0, Conclusion</p> <p>Engineering Equivalency Evaluation 9.5, "Fire Zones 70 (AA57A) and 73 (AA57B) Hatch Evaluations", Rev. 0</p> <p>Engineering Equivalency Evaluation 9.13, "Fire Zone 53 (AA46) and Fire Zone 57 (AA50) Hatch Evaluation", Rev. 0</p> <p>Engineering Equivalency Evaluation 9.14, "Fire Zone 43 (AA36) and Fire Zone 56 (AA48) Hatch Evaluation", Rev. 0</p> <p>Engineering Equivalency Evaluation 9.15, "Fire Zone 40B (AA39B) and</p>

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
			<i>"We conclude that fire doors and dampers are provided or committed where necessary in accordance with the provisions of Appendix A to Branch Technical Position APCSB 9.5-1 and are, therefore, acceptable."</i>	Fire Zone 55 (AA48) Hatch Evaluation", Rev. 0 Engineering Equivalency Evaluation 9.16, "Fire Zone 41 (AA40) and Fire Zone 55 (AA48) Hatch Evaluation", Rev. 0
		These commitments to remedy any deficiencies listed in the aforementioned Safety Evaluation Report have been fulfilled per the FPPM, which states:	<i>"The noted deficiencies were corrected or appropriate justifications have been prepared."</i>	Engineering Equivalency Evaluation 9.17, "Fire Zone 54 (AA47) and Fire Zone 58 (AA51) Hatch Evaluation", Rev. 0 Engineering Equivalency Evaluation 9.18, "Fire Zone 52 (AA3) and Fire Zone 59 (AA52) Hatch Evaluation", Rev. 0
		The fire doors where deficiencies were corrected or justifications prepared, as approved by the SE Report, are still used at CNP. There have been no plant modifications or other changes that would invalidate the basis for approval. The corrected doors remain unchanged. The justification for the any deficiencies remains valid and unchanged.		Engineering Equivalency Evaluation 9.19, "Fire Zone 45 (AA43) and Fire Zone 60 (AA52) Hatch Evaluation", Rev. 0 Engineering Equivalency Evaluation 9.21, "Fire Zone 110 (AA2A) and Fire Zone 43 (AA36) Door Evaluation", Rev. 0 Engineering Equivalency Evaluation 9.22, "Fire Zone 111 (AA2B) and Fire Zone 44S (AA42) Door Evaluation", Rev. 0
		Complies with use of EEEEs: Where any unrated doors are located in fire area boundaries, an evaluation has been		Engineering Equivalency Evaluation 9.23, "Fire Zone 116 (AA9) Boundary Evaluation", Rev. 0 Engineering Equivalency Evaluation

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
			performed to determine the doors are equivalent or adequate for the hazard.	9.24, "Fire Zone 117 (AA29) Boundary Evaluation", Rev. 0
				Engineering Equivalency Evaluation 9.25, "Essential Service Water Pump House Hatch and Fire Damper Evaluation (Fire Areas AA2A, AA32 and AA33)", Rev. 0
				Engineering Equivalency Evaluation 9.31, "Fire Zones 62A, 62B and 62C (AA54) Boundary Evaluation", Rev. 0
				Engineering Equivalency Evaluation 9.32, "Fire Zones 63A, 63B and 63C (AA56) Boundary Evaluations", Rev. 0
				Engineering Equivalency Evaluation 9.37, "Fire Zones 5 (AA5/6) and 32 (AA3) Boundary Evaluations", Rev. 0
				Engineering Equivalency Evaluation 9.39, "Fire Zone 70 (AA57A) to Fire Zone 129 (AA2A) Boundary Evaluation", Rev. 0
				Engineering Equivalency Evaluation 11.1, "Auxiliary Building El. 587' to Spent Fuel Heat Exchanger Pit Pump Room Hatch Boundary Evaluation Fire Zone 5 (AA5/6) and Fire Zone 36 (AA3) Hatch Evaluation", Rev. 0
				Engineering Equivalency Evaluation 11.9, "Turbine, Auxiliary and Containment Buildings Boundary Evaluation", Rev. 0

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
				Engineering Equivalency Evaluation 11.15, "Switchgear Room Construction Boundary Room Evaluation Unit 1 Fire Zones 14, 40A, 40B, 41 and 42A (AA13, AA39A, AA39B, AA40 and AA41) & Unit 2 Fire Zones 20, 45, 46A, 47A and 47B (AA25, AA43, AA44, AA45A and AA45B)", Rev. 0
				Engineering Equivalency Evaluation 11.37, "Fire Zones 52 and Fire Zone 44N Hatch Evaluation", Rev. 0
				Engineering Equivalency Evaluation 11.39, "Fireproofing For The West Motor Driven Auxiliary Feedwater Pump Enclosures Fire Zones 17A (AA16), 17B (AA17), 80 (AA2A), And 84 (AA2B)", Rev. 0
				Engineering Equivalency Evaluation 11.44, "Expansion of Fire Zone 33 and 146 and Unrated Fire Doors (361 and 362) Fire Zones 32, 33, and 34 (Fire Areas AA3, AA34 and AA35)", Rev. 0
				Engineering Equivalency Evaluation 11.56, "Turbine Building Main Steam Access Way Fire Zones 110 to 114, Fire Zones 111 to 115, Fire Zones 112 to 2N, Fire Zones 113 to 2S (Fire Areas AA2A, AA2B, AA2C)", Rev. 0
				Engineering Equivalency Evaluation 11.65, "Fire Door Closure Evaluation (Fire Areas AA2, AA7, AA8, AA14,

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
				AA15, AA23, AA24, AA30, AA31, AA34, AA35, AA36/42, AA37, AA38, AA39, AA41, AA43, AA44, AA45, AA48, and AA53)", Rev. 0

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
3.11.3 [NFPA 90A - Fire Damper Requirements] (2)	<p>Passive fire protection devices such as doors and dampers shall conform with the following NFPA standards, as applicable:</p> <p>(2) NFPA 90A, "Standard for the Installation of Air-Conditioning and Ventilating Systems"</p>	<ul style="list-style-type: none"> • Complies • Complies by previous NRC approval • Complies with use of EEEEs 	<p>Complies: All ventilation dampers carry UL Class A (3 hour) fire rating or a UL Class B (1-1/2 hour) rating to be commensurate with the severity of the hazard as determined by the performance requirements established by Chapter 4 of NFPA 805. Per the FPPM, I&M has committed CNP to comply with NFPA 90A. Modifications to rated fire dampers are made in accordance with NFPA 90A in order to ensure that the fire protection features of the damper are not degraded.</p> <p>Complies by previous NRC approval: Technical specification-related fire dampers and HVAC system designs have been reviewed by the NRC for damper placement and ratings. These dampers have also been reviewed by I&M for rating and installation.</p> <p>Per letter from I&M to the NRC dated June 15, 1984:</p> <p><i>"In the area of HVAC ductwork, we have recently discovered that technical exemptions are required for 17 ducts which penetrate fire barriers. These areas are typified by low</i></p>	<p>FPPM, Rev. 11, Section 14.4.3</p> <p>I&M Letter 0692R "Request for Additional Technical Exemptions to Certain Fire Dampers and "Seismic Gaps", 6/15/84</p> <p>I&M Letter 0692U "Appendix R Technical Exemption for Seismic Gaps and HVAC Duct Penetrations", 8/13/84</p> <p>NRC Safety Evaluation of Fire Protection Requests, 8/27/85, Section 3.4</p> <p>Engineering Equivalency Evaluation 9.1, "Fire Zone 43 (AA36) and 91 (AA2A) Duct Evaluation"</p> <p>Engineering Equivalency Evaluation 9.2, "Fire Zone 54 (AA47) and Fire Zone 73 (AA57B) Duct Evaluation"</p> <p>Engineering Equivalency Evaluation 9.3, "CCW Pump Air Supply Duct Evaluation: Fire Zone 44S (AA42)"</p> <p>Engineering Equivalency Evaluation 9.4, "Auxiliary Building Vertical Air Shafts Evaluation: Fire Zones 12 (AA11) and 22 (AA27)"</p> <p>Engineering Equivalency Evaluation 9.7, "Fire Zone 13 (AA12) and Fire Zone 14 (AA13) Boundary Evaluation"</p>

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
			<i>combustible loading, and duct outlets being located in an area sufficiently removed from equipment important to the safe shutdown of the facility. Sound engineering evaluations can be used to justify our request for technical exemption of the requirements for fire dampers."</i>	Engineering Equivalency Evaluation 9.8, "Fire Zone 20 (AA25) and Fire Zone 21 (AA26) Boundary Evaluation"
			Per letter from I&M to the NRC dated August 13, 1984:	Engineering Equivalency Evaluation 9.33, "Fire Zone 6A (AA5/6) to 138B (AA1) Boundary Evaluations"
			<i>"The evaluation concludes that, because of a low combustible loading of less than 15 minutes in all applicable fire areas/zones, the location of safe shutdown components/circuits and the detection and suppression systems available in the subject fire area/zones, adequate protection from duct related fire damage is provided and safe shutdown capability is ensured. As discussed with your staff, the evaluation includes five additional ventilation duct penetrations without fire dampers, that also require technical exemptions. These duct penetrations listed below were not identified in the June 15, 1984 letter."</i>	Engineering Equivalency Evaluation 9.34, "Fire Zone 36 (AA3) to Fire Zone 5 (AA5/6) Boundary Evaluation"
				Engineering Equivalency Evaluation 9.35, "Fire Zone 108 (AA2A) to Fire Zone 33A (AA34) Boundary Evaluation"
				Engineering Equivalency Evaluation 9.36, "Fire Zone 109 (AA2B) to 34A (AA35) Boundary Evaluation"
				Engineering Equivalency Evaluation 9.37, "Fire Zones 5 (AA5/6) and 32 (AA3) Boundary Evaluations"
				Engineering Equivalency Evaluation 9.38, "Fire Zone 69 (AA3) to Fire Zones 108 (AA2A) and 109 (AA2B) Boundary Evaluations"
				Engineering Equivalency Evaluation 9.40, "Fire Zone 7 (AA7) to Fire Zone 61 (AA5/6) Boundary Elevation"
			The NRC Safety Evaluation, dated August 27, 1985 states:	Engineering Equivalency Evaluation 9.41, "Fire Zones 37 (AA36) and 51(AA3) HVAC Duct Penetrations"

Attachment A - NEI 04-02 Table B-1 - Transition of Fundamental Fire Protection Program and Design Elements (NFPA 805 Chapter 3)

NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
			<p><i>"Based on our evaluation, we conclude that we have reasonable assurance that the 22 Auxiliary Building undampered ventilation duct penetrations will not affect safe-shutdown in the event of a fire in Fire Area A, B, C, D or E. The lack of fire dampers in these 22 ventilation duct penetrations is, therefore, an acceptable deviation from the guidelines of Section D.I.(j) of Appendix A to BTP APCSB 9.5-1."</i></p> <p>The 22 undampered ventilation duct penetrations, as approved by the SE Report, still exist at CNP. There have been no plant modifications or other changes that would invalidate the basis for approval. The justification for the ventilation ducts remains valid and unchanged.</p> <p>Complies with use of EEEEs: Engineering equivalency evaluations have been performed for any unrated dampers located in fire area boundaries. These engineering equivalency evaluations determined the dampers are equivalent or adequate for the hazard.</p>	<p>Engineering Equivalency Evaluation 11.14, "Cable Spreading Room Construction Boundary Evaluation (Fire Areas AA3,AA7, AA8, AA9, AA10, AA29, AA30, AA31, AA34, AA35, AA36, AA37, AA38, AA42, AA48, AA50, AA51 and AA52)"</p> <p>Engineering Equivalency Evaluation 11.15, "Switchgear Room Construction Boundary Room Evaluation Unit 1 Fire Zones 14, 40A, 40B, 41 and 42A (AA13, AA39A, AA39B, AA40 and AA41) & Unit 2 Fire Zones 20, 45, 46A, 47A and 47B (AA25, AA43, AA44, AA45A and AA45B)"</p> <p>Engineering Equivalency Evaluation 11.16, "Lube Oil Storage Rooms Fire Zones 83 and 95 (AA2A), and 88 and 100 (AA2B) Boundary Evaluation"</p> <p>Engineering Equivalency Evaluation 11.45, "Auxiliary Building HVAC Duct Penetrations Boundary Evaluation Fire Areas AA1, AA3, AA5/6, AA36 and AA42"</p> <p>Engineering Equivalency Evaluation 11.56, "Turbine Building Main Steam Access Way Fire Zones 110 to 114, Fire Zones 111 to 115, Fire Zones 112 to 2N, Fire Zones 113 to 2S (Fire Areas AA2A, AA2B, AA2C)"</p> <p>Engineering Equivalency Evaluation 12.13, "Fire Damper Closure Review"</p>

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
3.11.3 [NFPA 101 - Life Safety Code Requirements] (3)	Passive fire protection devices such as doors and dampers shall conform with the following NFPA standards, as applicable: (3) NFPA 101, "Life Safety Code"	• Complies with clarification	CNP complies with clarification with regards to NFPA 101, 2000 Edition. NFPA 101 compliance is achieved through NFPA 80 and NFPA 90A. NFPA 101, 2000 Edition, Section 8.2.3.2.1(a) with regards to rated fire door assemblies refers to NFPA 80. NFPA 101, 2000 Edition, Section 9.2.1 with regards to rated fire dampers refers to NFPA 90A. Table B-1, Section 3.11.3(1) and 3.11.3(2) discuss compliance of NFPA 80 and NFPA 90A.	FPPM, Rev. 11, Section 7.0 and Sections 14.4.2 and 14.4.3

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
3.11.4 Through Penetration Fire Stops	Through penetration fire stops for penetrations such as pipes, conduits, bus ducts, cables, wires, pneumatic tubes and ducts, and similar building service equipment that pass through fire barriers shall be protected as follows.	<ul style="list-style-type: none"> • Complies • Complies by previous NRC approval • Complies with use of EEEEs 	<p>Complies: CNP specification ES-FIRE-0601-QCF details the requirements for the installation and maintenance of fire rated seals and fire stops at CNP. The scope of this specification is for penetration seals that are installed or are being installed at CNP that will function to prevent the spread of fire.</p> <p>Additionally, per specification ES-FIRE-0601-QCF, CNP allows the use of additional test standards ASTM E-814, MEEB 634 and NFPA 251 for development of standard fire test, and qualification of fire rated penetration seals.</p> <p>Complies by previous NRC approval: By the response to Appendix A to Branch Technical Position APCSB 9.5-1, dated January 31, 1977, item D.1.(j) I&M stated:</p> <p><i>"all openings for cable, pipe, and ductwork in these walls, floors, and ceilings have been sealed with foamed in place silicone which was tested in march 1975 for up to five hours fire exposure in an ASTM E 119 wall fire test."</i></p> <p>The NRC Safety Evaluation,</p>	<p>Plant Specification ES-FIRE-0601-QCF, "Fire Rated Seals", Rev. 3</p> <p>I&M response to Appendix A to Branch Technical Position APCSB 9.5-1 for Units No. 1 and 2, 1/31/77, Section D.1.(j)</p> <p>NRC Safety Evaluation dated 7/31/79, Pg. 13, "Other Items Relating to the Station Fire Protection Program", Section A.</p> <p>Engineering Equivalency Evaluation 9.35, "Fire Zone 108 (AA2A) to Fire Zone 33A (AA34) Boundary Evaluation", Rev. 0</p> <p>Engineering Equivalency Evaluation 9.36, "Fire Zone 109 (AA2B) to 34A (AA35) Boundary Evaluation", Rev. 0</p> <p>Engineering Equivalency Evaluation 9.37, "Fire Zones 5 (AA5/6) and 32 (AA3) Boundary Evaluations", Rev. 0</p> <p>Engineering Equivalency Evaluation 11.2, "Fire Zone 7 (AA7) to Fire Zone 38 (AA37) Boundary Evaluation", Rev. 0</p> <p>Engineering Equivalency Evaluation 11.3, "Fire Zone 27 (AA31) to Fire Zone 39 (AA38)", Rev. 0</p> <p>Engineering Equivalency Evaluation 11.4, "Unit 1 Auxiliary Building</p>

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
			dated July 31, 1979 states:	Elevation 620 ft.-6 in. to Auxiliary Cable Vault Fire Zone 44n to Fire Zone 56", Rev. 0
			<i>"The test report shows that the penetration seal passed a 3-hour E-119 type fire exposure test. However, the test included only the Unit 2 penetration design. The licensees have provided a comparison between Unit 1 and Unit 2 penetration seal designs to justify that the Unit 2 design is the "worst case" for fire testing. We agree with this evaluation and conclude that the Unit 2 seal tests are acceptable for the Unit 1 seals. We conclude that the penetration fire stops which are in place provide sufficient protection from the unbounded spread of fire along electrical cables. We base this conclusion on our knowledge of ASTM E-119 fire tests including those cited by the licensees which substantiate the fire resistive ability of penetration fire stops constructed with silicone foam."</i>	Engineering Equivalency Evaluation 11.5, "Unit 1 EPS/4 KV Switchgear Complex Ventilation Shaft Boundary Evaluation (Fire Areas AA39A, AA39B, AA40, AA41 and AA48)", Rev. 0
				Engineering Equivalency Evaluation 11.6, "Fire Zones 45 (AA43), 46A through 46D (AA44), 47A (AA45A), 47B (AA45B) to Fire Zone 60 (AA52) Shaft Boundary Evaluation", Rev. 0
				Engineering Equivalency Evaluation 11.7, "Fire Zone 5 (AA5/6) to Unit 1 Fire Zones 62A, 62B and 62C (AA54) and Unit 2 Fire Zones 63A, 63B and 63C (AA5) Removable Block Walls", Rev. 0
			The foamed in place silicone design, as approved by the SE Report, is still in use at CNP. There have been no plant modifications or other changes that would invalidate the basis for approval. The foamed in place silicone design and the justification of the worst case	Engineering Equivalency Evaluation 11.15, "Switchgear Room Construction Boundary Room Evaluation Unit 1 Fire Zones 14, 40A, 40B, 41 and 42A (AA13, AA39A, AA39B, AA40 and AA41) & Unit 2 Fire Zones 20, 45, 46A, 47A and 47B (AA25, AA43, AA44, AA45A and AA45B)", Rev. 0
				Engineering Equivalency Evaluation 11.16, "Lube Oil Storage Rooms Fire Zones 83 and 95 (AA2A), and 88 and 100 (AA2B) Boundary Evaluation",

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
			configuration has not changed.	Rev. 0
			Complies with use of EEEEs: Where through penetration fire stops are not protected in accordance with Section 3.11.4, these assemblies have been evaluated to be equivalent or adequate for the hazard.	Engineering Equivalency Evaluation 11.17, "Diesel Generator Fuel oil Day Tank Rooms Fire Zones 15 (AA14), 16 (AA15), 18 (AA23) and 19 (AA24) Boundary Evaluation", Rev. 0
				Engineering Equivalency Evaluation 11.20, "Narrow Space Openings between Penetrating Items and the Barrier or Between Penetrating Items Boundary Evaluation", Rev. 0
				Engineering Equivalency Evaluation 11.24, "Fire Retention Capability of Nonconforming Fire Seals in Fire Zones having a Low Fire Severity", Rev. 0
				Engineering Equivalency Evaluation 11.26, "Fire Retention Capability of a HELB 3 Pressure Boundary Seal (Fire Areas AA19, AA20, AA21 and AA22)", Rev. 0
				Engineering Equivalency Evaluation 11.27, "Generic Fire Seal Design 1", Rev. 0
				Engineering Equivalency Evaluation 11.28, "Generic Fire Seal Design 2 (Fire Areas AA7, AA8, AA39A, AA40, AA43, AA45A, AA45B, AA48 and AA52)", Rev. 0
				Engineering Equivalency Evaluation 11.29, "Generic Fire Seal Design 3 in

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
				Fire Areas AA2A, AA2B, and AA15", Rev. 0
				Engineering Equivalency Evaluation 11.30, "Generic Fire Seal Design 4 (AA2)", Rev. 0
				Engineering Equivalency Evaluation 11.31, "Generic Fire Seal Design 5 (Fire Areas AA31 and AA38)", Rev. 0
				Engineering Equivalency Evaluation 11.32, "Generic Fire Seal Design 6 (AA2)", Rev. 0
				Engineering Equivalency Evaluation 11.33, "Generic Fire Seal Design 7 (Fire Areas AA7 and AA37)", Rev. 0
				Engineering Equivalency Evaluation 11.34, "Generic Fire Seal Design 8", Rev. 0
				Engineering Equivalency Evaluation 11.35, "Generic Fire Seal Design 9", Rev. 0
				Engineering Equivalency Evaluation 11.47, "Fire Zones 44N (AA36), 44S (AA42) and 52 (AA3) Penetration Seals", Rev. 0
				Engineering Equivalency Evaluation 11.48, "Fire Zones 15 (AA14), 16 (AA15) 18 (AA23) and 19 (AA24) Penetration Seals", Rev. 0
				Engineering Equivalency Evaluation

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
				11.49, "Acceptability of Valve 2-FP-392-2-11 RCP Fire Suppression Priming Water Check Valve (Fire Area AA58)", Rev. 0
				Engineering Equivalency Evaluation 11.50, "Embedded Conduit Fire Wrap Protection (Fire Areas AA14 and AA24)", Rev. 0
				Engineering Equivalency Evaluation 11.51, "Screenhouse and Water Intake System Boundary Evaluation Fire Zone 142 (AA2A) to Fire Zone 143 (YD)", Rev. 0
				Engineering Equivalency Evaluation 11.54, "Unit 1 Main Control Room Cable Vault Penetration Seal W5111 Fire Zone 57 and 91 (Fire Areas AA50 and AA2A)", Rev. 0
				Engineering Equivalency Evaluation 11.56, "Turbine Building Main Steam Access Way Fire Zones 110 to 114, Fire Zones 111 to 115, Fire Zones 112 to 2N, Fire Zones 113 to 2S (Fire Areas AA2A, AA2B, AA2C)", Rev. 0

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
3.11.4 [Annular Space Requirements] (a)	The annular space between the penetrating item and the through opening in the fire barrier shall be filled with a qualified fire-resistive penetration seal assembly capable of maintaining the fire resistance of the fire barrier. The assembly shall be qualified by tests in accordance with a fire test protocol acceptable to the AHJ or be protected by a listed fire-rated device for the specified fire-resistive period.	<ul style="list-style-type: none"> • Complies • Complies by previous NRC approval • Complies with use of EEEEs 	<p>Complies: CNP specification ES-FIRE-0601-QCF details the requirements for the installation and maintenance of fire rated seals and fire stops at CNP. The scope of this specification is for penetration seals that are installed or will be installed at CNP that will function to prevent the spread of fire. Per this specification, the contractor installing the fire seals must furnish documentation that the configurations have passed ASTM E-119 fire and hose stream tests that have been performed and documented by an independent laboratory.</p> <p>Per the FPPM, penetration seals are required to be fire tested to demonstrate they meet the required fire rating of the barrier. Seals at CNP are tested in accordance with ASTM E-119 requirements.</p> <p>Additionally, per specification ES-FIRE-0601-QCF, the standards which can be used for development of standard fire test and qualification of fire rated penetration seals are ASTM E-814, MEEB 634 and NFPA 251.</p>	<p>FPPM, Rev. 11, Section 12.2.2 and Table 5.1, Section D, "General Guidelines for Plant Protection"</p> <p>Plant Specification ES-FIRE-0601-QCF, "Fire Rated Seals", Rev. 3, 9/17.2010, Section 1.2, Section 14.2 and Attachment 1, Typical Details</p> <p>I&M Donald C. Cook Nuclear Plant "Response to Appendix A to Branch Technical Position APCSB 9.5-1 for Units No. 1 and 2", 1/31/77, Section D.1.(j)</p> <p>NRC Safety Evaluation Report dated 7/31/79, Pg. 13, "Other Items Relating to the Station Fire Protection Program", Section A.</p> <p>Engineering Equivalency Evaluation 9.35, "Fire Zone 108 (AA2A) to Fire Zone 33A (AA34) Boundary Evaluation", Rev. 0</p> <p>Engineering Equivalency Evaluation 9.36, "Fire Zone 109 (AA2B) to 34A (AA35) Boundary Evaluation", Rev. 0</p> <p>Engineering Equivalency Evaluation 9.37, "Fire Zones 5 (AA5/6) and 32 (AA3) Boundary Evaluations", Rev. 0</p> <p>Engineering Equivalency Evaluation 11.2, "Fire Zone 7 (AA7) to Fire Zone 38 (AA37) Boundary Evaluation", Rev. 0</p>

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
			<p>Complies by previous NRC approval: By the response to Appendix A to Branch Technical Position APCS 9.5-1, dated January 31, 1977, item D.1.(j) I&M stated:</p> <p><i>"all openings for cable, pipe, and ductwork in these walls, floors, and ceilings have been sealed with foamed in place silicone which was tested in march 1975 for up to five hours fire exposure in an ASTM E 119 wall fire test."</i></p> <p>The NRC Safety Evaluation, dated July 31, 1979 states:</p> <p><i>"The test report shows that the penetration seal passed a 3-hour E-119 type fire exposure test. However, the test included only the Unit 2 penetration design. The licensees have provided a comparison between Unit 1 and Unit 2 penetration seal designs to justify that the Unit 2 design is the "worst case" for fire testing. We agree with this evaluation and conclude that the Unit 2 seal tests are acceptable for the Unit 1 seals. We conclude that the penetration fire stops which are in place provide sufficient protection from the unbounded spread of fire along electrical cables. We base this conclusion</i></p>	<p>Engineering Equivalency Evaluation 11.3, "Fire Zone 27 (AA31) to Fire Zone 39 (AA38)", Rev. 0</p> <p>Engineering Equivalency Evaluation 11.4, "Unit 1 Auxiliary Building Elevation 620 ft.-6 in. to Auxiliary Cable Vault Fire Zone 44n to Fire Zone 56", Rev. 0</p> <p>Engineering Equivalency Evaluation 11.5, "Unit 1 EPS/4 KV Switchgear Complex Ventilation Shaft Boundary Evaluation (Fire Areas AA39A, AA39B, AA40, AA41 and AA48)", Rev. 0</p> <p>Engineering Equivalency Evaluation 11.6, "Fire Zones 45 (AA43), 46A through 46D (AA44), 47A (AA45A), 47B (AA45B) to Fire Zone 60 (AA52) Shaft Boundary Evaluation", Rev. 0</p> <p>Engineering Equivalency Evaluation 11.7, "Fire Zone 5 (AA5/6) to Unit 1 Fire Zones 62A, 62B and 62C (AA54) and Unit 2 Fire Zones 63A, 63B and 63C (AA5) Removable Block Walls", Rev. 0</p> <p>Engineering Equivalency Evaluation 11.15, "Switchgear Room Construction Boundary Room Evaluation Unit 1 Fire Zones 14, 40A, 40B, 41 and 42A (AA13, AA39A, AA39B, AA40 and AA41) & Unit 2 Fire Zones 20, 45, 46A, 47A and 47B</p>

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
			on our knowledge of ASTM E-119 fire tests including those cited by the licensees which substantiate the fire resistive ability of penetration fire stops constructed with silicone foam."	(AA25, AA43, AA44, AA45A and AA45B)", Rev. 0
			The foamed in place silicone design, as approved by the SE Report, is still in use at CNP. There have been no plant modifications or other changes that would invalidate the basis for approval. The foamed in place silicone design and the justification of the worst case configuration has not changed.	Engineering Equivalency Evaluation 11.16, "Lube Oil Storage Rooms Fire Zones 83 and 95 (AA2A), and 88 and 100 (AA2B) Boundary Evaluation", Rev. 0
			Complies with use of EEEEs: Engineering equivalency evaluations have been performed for any penetrations that do not provide a fire resistance rating at least equal to that of the fire area barrier itself. These engineering equivalency evaluations determined the penetrations are equivalent or adequate for the hazard.	Engineering Equivalency Evaluation 11.17, "Diesel Generator Fuel oil Day Tank Rooms Fire Zones 15 (AA14), 16 (AA15), 18 (AA23) and 19 (AA24) Boundary Evaluation", Rev. 0 Engineering Equivalency Evaluation 11.20, "Narrow Space Openings between Penetrating Items and the Barrier or Between Penetrating Items Boundary Evaluation", Rev. 0 Engineering Equivalency Evaluation 11.24, "Fire Retention Capability of Nonconforming Fire Seals in Fire Zones having a Low Fire Severity", Rev. 0 Engineering Equivalency Evaluation 11.26, "Fire Retention Capability of a HELB 3 Pressure Boundary Seal (Fire Areas AA19, AA20, AA21 and AA22)", Rev. 0 Engineering Equivalency Evaluation 11.27, "Generic Fire Seal Design 1", Rev. 0 Engineering Equivalency Evaluation

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
				11.28, "Generic Fire Seal Design 2 (Fire Areas AA7, AA8, AA39A, AA40, AA43, AA45A, AA45B, AA48 and AA52)", Rev. 0
				Engineering Equivalency Evaluation 11.29, "Generic Fire Seal Design 3 in Fire Areas AA2A, AA2B, and AA15", Rev. 0
				Engineering Equivalency Evaluation 11.30, "Generic Fire Seal Design 4 (AA2)", Rev. 0
				Engineering Equivalency Evaluation 11.31, "Generic Fire Seal Design 5 (Fire Areas AA31 and AA38)", Rev. 0
				Engineering Equivalency Evaluation 11.32, "Generic Fire Seal Design 6 (AA2)", Rev. 0
				Engineering Equivalency Evaluation 11.33, "Generic Fire Seal Design 7 (Fire Areas AA7 and AA37)", Rev. 0
				Engineering Equivalency Evaluation 11.34, "Generic Fire Seal Design 8", Rev. 0
				Engineering Equivalency Evaluation 11.35, "Generic Fire Seal Design 9", Rev. 0
				Engineering Equivalency Evaluation 11.47, "Fire Zones 44N (AA36), 44S (AA42) and 52 (AA3) Penetration Seals", Rev. 0

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
				Engineering Equivalency Evaluation 11.48, "Fire Zones 15 (AA14), 16 (AA15) 18 (AA23) and 19 (AA24) Penetration Seals", Rev. 0
				Engineering Equivalency Evaluation 11.49, "Acceptability of Valve 2-FP-392-2-11 RCP Fire Suppression Priming Water Check Valve (Fire Area AA58)", Rev. 0
				Engineering Equivalency Evaluation 11.50, "Embedded Conduit Fire Wrap Protection (Fire Areas AA14 and AA24)", Rev. 0
				Engineering Equivalency Evaluation 11.51, "Screenhouse and Water Intake System Boundary Evaluation Fire Zone 142 (AA2A) to Fire Zone 143 (YD)", Rev. 0
				Engineering Equivalency Evaluation 11.54, "Unit 1 Main Control Room Cable Vault Penetration Seal W5111 Fire Zone 57 and 91 (Fire Areas AA50 and AA2A)", Rev. 0
				Engineering Equivalency Evaluation 11.56, "Turbine Building Main Steam Access Way Fire Zones 110 to 114, Fire Zones 111 to 115, Fire Zones 112 to 2N, Fire Zones 113 to 2S (Fire Areas AA2A, AA2B, AA2C)", Rev. 0

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
3.11.4 [Conduit Internal Fire Seals] (b)	<p>Conduits shall be provided with an internal fire seal that has an equivalent fire-resistive rating to that of the fire barrier through opening fire stop and shall be permitted to be installed on either side of the barrier in a location that is as close to the barrier as possible.</p> <p><i>Exception: Openings inside conduit 4 in. (10.2 cm) or less in diameter shall be sealed at the fire barrier with a fire-rated internal seal unless the conduit extends greater than 5 ft (1.5 m) on each side of the fire barrier. In this case the conduit opening shall be provided with noncombustible material to prevent the passage of smoke and hot gases. The fill depth of the material packed to a depth of 2 in. (5.1 cm) shall constitute an acceptable smoke and hot gas seal in this application.</i></p>	<ul style="list-style-type: none"> • Complies • Complies by previous NRC approval • Complies with use of EEEEs 	<p>Complies: CNP specification ES-FIRE-0601-QCF details the requirements for the installation and maintenance of fire rated seals and fire stops at CNP.</p> <p>Complies by previous NRC approval: By I&M submittal, dated October 20, 1988, Pg. 2 stated:</p> <p><i>"In consonance with our policy to maintain a safe as possible plant, we plan to seal conduits that meet the following criteria:</i></p> <p><i>1) An open-ended conduit is one in which the contained cables exit the conduit into a non-enclosed air space and do not directly enter into a metal enclosure such as a junction box or other similar noncombustible closure.</i></p> <p><i>2) When both ends of a double open-ended conduit terminate at the wall, it will be treated as a sleeve and sealed.</i></p> <p><i>3) For double open-ended conduits smaller than 2 inches in diameter:</i></p> <p><i>a. When both ends of the conduit terminate less than one foot from the barrier, at least one end will be sealed.</i></p> <p><i>b. When only one end of the conduit terminates less than one foot from the barrier, only that</i></p>	<p>FPPM, Rev. 11, Section 12.2.4 and Table 5.1, Section D, "General Guidelines for Plant Protection"</p> <p>Plant Specification ES-FIRE-0601-QCF, "Fire Rated Seals", Rev. 3, 9/17.2010, Section 7.8, 8.4.4 and Attachment 1, Typical Details.</p> <p>I&M Letter "Status of Internal Conduit Fire Seal Program and NRC Inspection Report 85013, Item 2.R" Dated 10/20/88, Pg. 2</p> <p>NRC Safety Evaluation Report dated 4/26/90, evaluation of I&M response to Unresolved Issue related to post-fire safe shutdown methodology, Pg. 10, Section 2.18.2</p> <p>Engineering Equivalency Evaluation 9.35, "Fire Zone 108 (AA2A) to Fire Zone 33A (AA34) Boundary Evaluation", Rev. 0</p> <p>Engineering Equivalency Evaluation 9.36, "Fire Zone 109 (AA2B) to 34A (AA35) Boundary Evaluation", Rev. 0</p> <p>Engineering Equivalency Evaluation 9.37, "Fire Zones 5 (AA5/6) and 32 (AA3) Boundary Evaluations", Rev. 0</p> <p>Engineering Equivalency Evaluation 11.2, "Fire Zone 7 (AA7) to Fire Zone 38 (AA37) Boundary Evaluation", Rev. 0</p>

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
			end of the conduit will be sealed.	
			4) For double open-ended conduits 2 inches in diameter:	Engineering Equivalency Evaluation 11.3, "Fire Zone 27 (AA31) to Fire Zone 39 (AA38)", Rev. 0
			a. When both ends of the conduit terminate less than 3 feet from the barrier, at least one end will be sealed.	Engineering Equivalency Evaluation 11.4, "Unit 1 Auxiliary Building Elevation 620 ft.-6 in. to Auxiliary Cable Vault Fire Zone 44n to Fire Zone 56", Rev. 0
			b. When only one end of the conduit terminates less than 3 feet from the barrier, only that end of the conduit will be sealed.	
			5) Double open-ended conduits greater than 2 inches in diameter will be sealed on at least one end."	Engineering Equivalency Evaluation 11.5, "Unit 1 EPS/4 KV Switchgear Complex Ventilation Shaft Boundary Evaluation (Fire Areas AA39A, AA39B, AA40, AA41 and AA48)", Rev. 0
			The NRC Safety Evaluation, dated April 26, 1990 states:	
			"Internal conduit seals are provided as delineated in a letter to the staff dated October 20, 1988. The internal seal program is consistent with the guidance provided in Appendix A to BTP APCS 9.5-1 and is, therefore, acceptable."	Engineering Equivalency Evaluation 11.6, "Fire Zones 45 (AA43), 46A through 46D (AA44), 47A (AA45A), 47B (AA45B) to Fire Zone 60 (AA52) Shaft Boundary Evaluation", Rev. 0
			The internal conduit sealing criteria, as approved by the SE Report, is still in use at CNP. There have been no plant modifications or other changes that would invalidate the basis for approval. The criteria for internally sealing conduit has not changed.	Engineering Equivalency Evaluation 11.7, "Fire Zone 5 (AA5/6) to Unit 1 Fire Zones 62A, 62B and 62C (AA54) and Unit 2 Fire Zones 63A, 63B and 63C (AA5) Removable Block Walls", Rev. 0
				Engineering Equivalency Evaluation 11.15, "Switchgear Room Construction Boundary Room Evaluation Unit 1 Fire Zones 14, 40A, 40B, 41 and 42A (AA13, AA39A, AA39B, AA40 and AA41) & Unit 2 Fire Zones 20, 45, 46A, 47A and 47B

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
			Complies with use of EEEEs: Engineering equivalency evaluations have been performed for any penetrations that do not provide a fire resistance rating at least equal to that of the fire area barrier itself. These engineering equivalency evaluations determined the penetrations are equivalent or adequate for the hazard.	(AA25, AA43, AA44, AA45A and AA45B)", Rev. 0 Engineering Equivalency Evaluation 11.16, "Lube Oil Storage Rooms Fire Zones 83 and 95 (AA2A), and 88 and 100 (AA2B) Boundary Evaluation", Rev. 0 Engineering Equivalency Evaluation 11.17, "Diesel Generator Fuel oil Day Tank Rooms Fire Zones 15 (AA14), 16 (AA15), 18 (AA23) and 19 (AA24) Boundary Evaluation", Rev. 0 Engineering Equivalency Evaluation 11.20, "Narrow Space Openings between Penetrating Items and the Barrier or Between Penetrating Items Boundary Evaluation", Rev. 0 Engineering Equivalency Evaluation 11.24, "Fire Retention Capability of Nonconforming Fire Seals in Fire Zones having a Low Fire Severity", Rev. 0 Engineering Equivalency Evaluation 11.26, "Fire Retention Capability of a HELB 3 Pressure Boundary Seal (Fire Areas AA19, AA20, AA21 and AA22)", Rev. 0 Engineering Equivalency Evaluation 11.27, "Generic Fire Seal Design 1", Rev. 0 Engineering Equivalency Evaluation

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
				11.28, "Generic Fire Seal Design 2 (Fire Areas AA7, AA8, AA39A, AA40, AA43, AA45A, AA45B, AA48 and AA52)", Rev. 0
				Engineering Equivalency Evaluation 11.29, "Generic Fire Seal Design 3 in Fire Areas AA2A, AA2B, and AA15", Rev. 0
				Engineering Equivalency Evaluation 11.30, "Generic Fire Seal Design 4 (AA2)", Rev. 0
				Engineering Equivalency Evaluation 11.31, "Generic Fire Seal Design 5 (Fire Areas AA31 and AA38)", Rev. 0
				Engineering Equivalency Evaluation 11.32, "Generic Fire Seal Design 6 (AA2)", Rev. 0
				Engineering Equivalency Evaluation 11.33, "Generic Fire Seal Design 7 (Fire Areas AA7 and AA37)", Rev. 0
				Engineering Equivalency Evaluation 11.34, "Generic Fire Seal Design 8", Rev. 0
				Engineering Equivalency Evaluation 11.35, "Generic Fire Seal Design 9", Rev. 0
				Engineering Equivalency Evaluation 11.47, "Fire Zones 44N (AA36), 44S (AA42) and 52 (AA3) Penetration Seals", Rev. 0

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
				Engineering Equivalency Evaluation 11.48, "Fire Zones 15 (AA14), 16 (AA15) 18 (AA23) and 19 (AA24) Penetration Seals", Rev. 0
				Engineering Equivalency Evaluation 11.49, "Acceptability of Valve 2-FP-392-2-11 RCP Fire Suppression Priming Water Check Valve (Fire Area AA58)", Rev. 0
				Engineering Equivalency Evaluation 11.50, "Embedded Conduit Fire Wrap Protection (Fire Areas AA14 and AA24)", Rev. 0
				Engineering Equivalency Evaluation 11.51, "Screenhouse and Water Intake System Boundary Evaluation Fire Zone 142 (AA2A) to Fire Zone 143 (YD)", Rev. 0
				Engineering Equivalency Evaluation 11.54, "Unit 1 Main Control Room Cable Vault Penetration Seal W5111 Fire Zone 57 and 91 (Fire Areas AA50 and AA2A)", Rev. 0
				Engineering Equivalency Evaluation 11.56, "Turbine Building Main Steam Access Way Fire Zones 110 to 114, Fire Zones 111 to 115, Fire Zones 112 to 2N, Fire Zones 113 to 2S (Fire Areas AA2A, AA2B, AA2C)", Rev. 0

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
3.11.5 Electrical Raceway Fire Barrier Systems (ERFBS)	<p>ERFBS required by Chapter 4 shall be capable of resisting the fire effects of the hazards in the area. ERFBS shall be tested in accordance with and shall meet the acceptance criteria of NRC Generic Letter 86-10, Supplement 1, "Fire Endurance Test Acceptance Criteria for Fire Barrier Systems Used to Separate Safe Shutdown Trains Within the Same Fire Area." The ERFBS needs to adequately address the design requirements and limitations of supports and intervening items and their impact on the fire barrier system rating. The fire barrier system's ability to maintain the required nuclear safety circuits free of fire damage for a specific thermal exposure, barrier design, raceway size and type, cable size, fill, and type shall be demonstrated.</p> <p><i>Exception No. 1: When the temperatures inside the fire barrier system exceed the maximum temperature allowed by the acceptance criteria of Generic Letter 86-10, "Fire Endurance Test Acceptance Criteria for Fire Barrier Systems Used to Separate Redundant Safe Shutdown Training Within the Same Fire Area," Supplement 1, functionality of the cable at these elevated temperatures shall be demonstrated. Qualification</i></p>	<ul style="list-style-type: none"> • Complies • Complies with use of EEEEs 	<p>Complies: ERFBS that are credited to meet the requirements of NFPA 805 Chapter 4 are identified in the individual Fire Safety Analysis Reports. ERFBS are installed to meet the requirements of GL 86-10, Supplement 1.</p> <p>Complies with use of EEEEs: Engineering Equivalency Evaluation 11.57 evaluates unprotected supports as adequate for the hazard.</p>	<p>CNP Fire Safety Analysis Reports</p> <p>12-FPP-4030-066-016, "Inspection of Thermo-Lag, Darmatt and Mecatiss wrapped enclosures", Rev. 2.</p> <p>FPPM, Rev. 11, Table 5.1, Section 8.2 and Table 8-1.</p> <p>Engineering Equivalency Evaluation 11.57, "Fire-Wrapped Cable Trays and Conduit Evaluations (Fire Areas AA14, AA24, AA32, AA39A, AA45A, AA2A and AA2B)", Rev. 0</p>

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NFPA 805 Element	NFPA 805 Requirement	Compliance Statement	Compliance Basis	Reference Document
	<p><i>demonstration of these cables shall be performed in accordance with the electrical testing requirements of Generic Letter 86-10, Supplement 1, Attachment 1, "Attachment Methods for Demonstrating Functionality of Cables Protected by Raceway Fire Barrier Systems During and After Fire Endurance Test Exposure."</i></p> <p><i>Exception No. 2: ERFBS systems employed prior to the issuance of Generic Letter 86-10, Supplement 1, are acceptable providing that the system successfully met the limiting end point temperature requirements as specified by the AHJ at the time of acceptance.</i></p>			