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March 26, 1984

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Director, Office of Nuclear Reactor Regulation
Attention: D. M. Crutchfield, Chief
Operating Reactors Branch No. 5
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Subject: Docket No. 50-206
Fire Protection Program Review
San Onofre Nuclear Generating Station, Unit 1

As part of our efforts to assure compliance with the licensing commitments made in the area of Fire Protection, a review of the installed modifications was conducted. Two areas of noncompliance were identified as a result of this review. The purpose of this letter is to notify you of the situation and the corrective measures which have been instituted. Specifically,

1. By letter dated February 13, 1981, the NRC granted our request to extend the due date for implementation of eight modifications to November 17, 1981. The modifications were required by 10CFR50.48 to be completed independent of the Systematic Evaluation Program (SEP) which superseded the schedule in the Fire Protection Safety Evaluation Report (FPSE) dated July 19, 1979. One of these modifications, 3.1.11.b, "Fire Barriers," indicated that fire stops would be installed for cable trays at the entrances to the pipe tunnel. Item 3.1.11.b summarized the fire barrier modifications which were identified in the Fire Hazards Analysis (FHA) for the pipe tunnel submitted by letter dated March 16, 1977. Item 6.1.4.c of the FHA indicates that fire stops would be installed for cable penetrations into the pipe tunnel.

The modifications were completed in November, 1981. However, as a result of the compliance review we were unable to determine whether all of the fire stops for cable penetrations identified in the FHA were appropriately installed at that time. Additionally, the compliance review revealed apparent confusion regarding the need to seal all cable penetrations or only cable tray penetrations. We requested of the NRC staff (T. Wambach) the rationale for the FPSE only requiring fire stops on cable trays and not, as specified in the FHA, on all cable penetrations (cables and cable trays). We were informed that the intent of the penetration sealing requirements is to install fire stops for all cable penetrations (both conduit and cable trays), and therefore,

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the wording of our original commitment should be used for the compliance review. After additional investigations the following determinations have been made:

- a. All required conduit and cable trays at entrances to the pipe tunnel had the required fire stops with the exception of several conduits which penetrate the south roof and one cable tray which leaves the pipe tunnel at the eastward turn.
- b. Of the conduits without the fire stops, one does not contain any wires, and one leads only to lights in the tunnel. All conduits with wire should have been sealed at the entrance to the pipe tunnel at the south roof where the other similar conduits were sealed.
- c. The cable tray which traverses the open end of the pipe tunnel at the eastward limit should have had a fire stop installed.

Since fire detectors in the pipe tunnel are operable, an hourly fire watch patrol has been implemented as a compensatory measure. Corrective measures to install the additional fire stops at the locations indicated above have been initiated and are scheduled to be completed prior to startup from the present outage.

Another item which has resulted from our review of the pipe tunnel has been the determination that additional evaluations must be made to establish the acceptability of the existing boundary at the eastward turn for the pipe tunnel. This eastward extension to the "dog house" containment penetration area appears not to have been considered in the FHA. These additional evaluations are scheduled to be completed during the present outage.

2. The FPSER also indicated in Sections 3.1.4 and 4.3.1.4 that the most hydraulically remote hose station(s) had been checked to verify that a residual pressure of 65 psig could be provided at the nozzle. Our records show that the test was completed by the committed date of October 15, 1978. However, as a result of the compliance review, it was determined that the actual test records could not be located. Accordingly, the test was redone with the lowest resulting pressure of 110 psig at the nozzle for a 75 foot hose.

If you have any questions or desire additional information, please contact me.

Very truly yours,

M. D. Medford

cc: J. B. Martin (USNRC, Regional Administrator)
A. DiAngelo (USNRC, Resident Inspector, Unit 1)