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 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylv 05000388
 AUTH. NAME AUTHOR AFFILIATION
 KEISER, H.W. Pennsylvania Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 MILLER, C.L. Project Directorate I-2

SUBJECT: Requests addition of Fire Zone 2-4B Susquehanna to areas approved for use of closed circuit television satisfying TS requirement for continuous fire watch in locked radiation areas.

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Pennsylvania Power & Light Company

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Harold W. Keiser
Senior Vice President-Nuclear
215/774-4194

SEP 09 1992

Director of Nuclear Reactor Regulation
Attention: Mr. C. L. Miller, Project Director
Project Directorate I-2
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

**SUSQUEHANNA STEAM ELECTRIC STATION
REQUEST TO USE CLOSED CIRCUIT TELEVISION
TO SATISFY THE REQUIREMENT FOR CONTINUOUS
FIRE WATCHES**

PLA-3844

FILE R41-2

**Docket Nos. 50-387
and 50-388**

Dear Mr. Miller:

This letter requests the addition of Fire Zone 2-4B at Susquehanna SES to the areas previously approved (NRC letter dated August 27, 1992, J.J. Raleigh to H.W. Keiser) for the use of closed circuit television as a means of satisfying the technical specification requirement for a continuous fire watch in locked radiation areas.

As with our previous request, this request is being made as a precautionary action in the event fire detection capability in this area would become inoperable. We are currently satisfying all technical specification compensatory actions required as a result of having declared Thermo-Lag fire barriers inoperable. A CCTV camera system has been staged in the fire zone of concern to permit continuous observation should it become necessary.

NRC Bulletin 92-01, and supplement 1 thereto and our subsequent evaluation of Thermo-Lag installations utilized at Susquehanna SES has led us to declare all Thermo-Lag fire barriers to be inoperable. Susquehanna Steam Electric Station Technical Specification 3/4.7.7 requires all fire rated assemblies to be operable at all times. With one or more of the required fire rated assemblies inoperable, a continuous fire watch must be established within one hour on at least one side of the affected assembly, or fire detector operability must be verified on at least one side of the inoperable fire assembly and an hourly fire watch established.

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Since the fire detectors in the affected fire zone are currently operable, an hourly fire watch has been established to compensate for the inoperability of the barriers. We have chosen to address our ability to promptly respond to a loss of detection capability in combination with the loss of fire barriers before the condition presented itself. Since this condition would require a continuous fire watch for a fire area comprised of an inaccessible locked radiation area we became particularly concerned due to ALARA considerations. Therefore, after appropriate evaluation, a CCTV camera system has been staged (i.e., it is not currently in use) in the fire zone of concern to permit continuous observation of this inaccessible fire zone should that become necessary. The CCTV camera system provides the capability for performing a fire watch by permitting remote observation of an inoperable fire barrier and the general area surrounding the fire barrier. The use of CCTV reduces personnel radiation exposure while providing a level of protection adequate to compensate for the inability to post a fire watch within the fire area. Locating the fire watch outside of an inaccessible area using CCTV does not reduce the level of protection required by the technical specifications and conforms with acceptable ALARA practices.

We request your expedited attention to this request to use CCTV as a means of satisfying the technical specification requirement for a continuous fire watch in Fire Zone 2-4B. Should you have any questions regarding this request, please contact Mr. W.W. Williams at 215-774-5610.

Very truly yours,



H. W. Keiser

cc: ~~NRC Document Control Desk~~ (original)
NRC Region I
Mr. G. S. Barber, NRC Sr. Resident Inspector
Mr. J. J. Raleigh, NRC Project Manager



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