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SUBJECT: Advises that to ensure adequate backup fire protection water suppression capability, design will be changed to add valve & piping to isolate secondary suppression hose stations from primary suppression sys.Completion expected by 850401. DISTRIBUTION CODE: BOO2D COPIES RECEIVED:LTR _/ ENCL _ SIZE: _/ TITLE: Licensing Submittal: Fire Protection									
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## Arizona Public Service Company

ANPP-31335-EEVB/WFQ/DKN December 5, 1984

Director of Nuclear Reactor Regulation Attention: Mr. George W. Knighton, Chief Licensing Branch No. 3 Division of Licensing U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Subject: Palo Verde Nuclear Generating Station (PVNGS) Units 1, 2 and 3 Docket Nos. STN-50-528/529/530 Fire Protection Modification and Compensatory Measures File: 84-056-026; G.1.01.10

Dear Mr. Knighton:

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Appendix A to 10CFR50 requires the fire protection system to have adequate capacity and capability. Branch Technical Position APCSB 9.5-1 Appendix A, interprets this to mean that no single failure should disable the primary and secondary suppression system. At the 120- and 140-foot elevations in the Auxiliary Building (Fire Zones 47B, 52D, 56B, 56C, 57I, and 57J), the primary and secondary systems are interconnected and the nearest non-interconnected hose station is in excess of 150 feet away. Accordingly, due to the long hose length necessary to provide backup suppression capability, the intent of the BTP is not met.

To ensure adequate backup fire protection water suppression capability, the PVNGS design will be changed to add a valve and piping that will isolate the secondary suppression hose stations from the primary suppression system at the 120- and 140-foot elevation. In the interim, the fire detection system will be operational and whenever the primary suppression system is not available, backup fire suppression water will be provided from the nearest active hose station in accordance with Technical Specification 3/4.7.11.4. Thus, even in the unlikely event of a piping failure and a fire, suppression capability would be maintained by compensatory measures. This design change is expected to be accompleted by April 1, 1985.

Please contact William Quinn on my staff should you have questions regarding this request.

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EEVBJr/DKN/no

cc: E.A. Licitra D.J. Kubicki P. Qualls A.C. Gehr R.P. Zimmerman Very truly yours,

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E.E. Van Brunt, Jr APS Vice President Nuclear Production ANPP Project Director

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