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RECIP. NAME RECIPIENT AFFILIATION
DENTON, H. R. Office of Nuclear Reactor Regulation, Director (post 851125

SUBJECT: Forwards addl deviation to Branch Technical Position 9.5-1 on NUREG-0800 re fire protection, per discussions at 860430 meeting w/NRC.

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Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Washington, DC 20555

SHEARON HARRIS NUCLEAR POWER PLANT
UNIT NO. 1 - DOCKET NO. 50-400
FIRE PROTECTION - DEVIATIONS FROM BTP 9.5-1

Dear Mr. Denton:

Carolina Power & Light Company hereby submits additional deviations to the Branch Technical Position 9.5-1 to NUREG-0800. Attachment 1 provides the technical information needed for your review. The deviations were discussed with your staff at an April 30, 1986, meeting.

Should you have any questions concerning this letter, please contact Mr. Patrick Carier at (919) 836-8165.

Yours very truly,

S. D. Floyd for

S. R. Zimmerman
Manager
Nuclear Licensing Section

SRZ/PPC/mmh

Attachment

cc: Mr. B. C. Buckley (NRC) (W/A)
Mr. G. F. Maxwell (NRC-SHNPP)
Dr. J. Nelson Grace (NRC-RII)
Mr. Travis Payne (KUDZU)
Mr. Daniel F. Read (CHANGE/ELP)
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A002
1/1

FIRE PROTECTION ADDITIONAL DEVIATIONS

SUMMARY

A deviation has been identified from BTP-9.5-1, Section C.5.a (1, 2, 4 and 5) of NUREG-0800 from having fire-rated dampers, doors, and penetration seals in walls and floors designated as 3-hour rated.

AREA DESCRIPTION

See Tables 1, 2, and 3 for area description.

DISCUSSION

Tables 1, 2 and 3 identify the location of the doors, HVAC and bus duct penetrations. For those penetrations and doors where safe shutdown equipment is within 20 feet, automatic suppression and detection has been provided on at least one side of the door or penetration. The combustible loading in the areas are considered low to moderate. The doors are manufactured to the same engineering specification as would a 3-hour rated door. The SSA equipment identified within 20 feet radius of the doors or penetrations do not have their redundant counterpart within 20 feet except for MCC-1A-35SA and MCC-1B-35SB (deviation previously identified in NLS-86-040, dated February 13, 1986).

CONCLUSION

CP&L believes that this deviation is justified for the following:

1. Low to moderate combustible loading in the zone.

2. Suppression and detection systems are provided on at least one side of the door or penetration.

3. The SSA equipment identified within 20 feet radius of the doors or penetrations do not have their redundant counterpart within 20 feet except as noted above.

Based on the fire prevention features provided, CP&L concluded that the addition of fire dampers and rated doors would not greatly enhance the fire protection in the these zones and provides an acceptable deviation to NUREG-0800, Section C.5.1 (1, 2, 4, and 5).

(0767NEL)

SUMMARY

A deviation has been identified from BTP-9.5-1, Section C.5.b(2) NUREG-0800 from having to consider intervening combustibles between the following: 1) the power and control cable feeding the CCW 1A-SA pump, and 2) the CCW 1B-SB pump and related cables.

AREA DESCRIPTION

Plant Location: Reactor Auxiliary Building Elevation 236 feet
Fire Area: 1-A-BAL
SSA Area: FAABL3
Fire Zone: 1-A-3-PB
Other Safe Shutdown Equipment in the SSA Area:

1. Air Handler AH-29
2. Motor Control Centers 1B22SB and 1A22SA
3. SW Booster Pumps
4. Air Handler AH-9
5. Air Handler AH-6 (Local)
6. Air Handler AH-7 (Local)
7. RHR Heat Exchangers
8. CCW Heat Exchangers
9. CCW Pumps
10. CVCS Charging Pumps
11. Air Handler AH-10
12. Air Handler AH-11 (Local)
13. Auxiliary Feedwater Pumps

DISCUSSION

The power and control cable is routed in conduit from CCW 1A-SA to cable tray raceway which is approximately 100 feet from the CCW 1B-SB pump and related cable.

Intervening combustibles are present between these components in the form of IEEE-383 cables located in cable trays approximately 8 feet away (see Figure 1). The location is provided with an automatic suppression system actuated by thermal detection. Ionization detectors are also provided in this location for fire detection. This zone has low combustible loading as described in the SHNPP fire hazard analysis, Section 9.5A.3, Page 9.5A-29. Additional information for this area is available in licensee submittal NLS-84-245, dated June 12, 1984.

CONCLUSION

CP&L believes that this deviation is justified for the following reasons:

1. Low combustible loading in the area.

2. Suppression and detection systems are provided in the area.

3. Physically separated by approximately 100 feet.

Based on the fire prevention features provided, CP&L concluded that further consideration of intervening combustibles would not greatly enhance fire protection in this zone and provides an acceptable deviation to NUREG-0800, Section C.5.b(2).

(0767NEL)

TABLE 1

FIRE DOOR DEVIATION

DOOR NO.	FSAR FIGURE (ATTACHED)	SSA SK	INT/EXT DOOR	FIRE ZONE	AUTOMATIC PROTECTION	COMBUSTIBLE LOADING	SSA EQUIPMENT
D9	9.5A-8	SO13	INT	1-A34-RHXA	NONE	15,495	RHR Heat Exchanger 1A-SA
	9.5A-8			1-A-4-CHLR	M,T&I	155,296	NONE
D14	9.5A-8	SO13	INT	1-A-34-RHXA	NONE	NEGLIGIBLE	NONE
	9.5A-8			1-A-4-CHLR	M,T&I	155,296	NONE
D54	9.5A-8	SO14	INT	1-A-4-COME	M,I,T	38,989	MCC-1A35-SA
	9.5A-8			1-A-4-CHFA	I	67,917	NONE

TABLE 2

FIRE DAMPER DEVIATION

FLOOR ELEVATION +261'-0 (SEE ATTACHED FIGURE 9.5A-8)

HVAC DUCT PENETRATION I.D. NO.:	DUCT SIZE(IN) HVAC DWG CAR-2168	HVAC DUCT CATEGORY	HVAC SYSTEM	X	FIRE ZONE	FIRE ZONE COMBUSTIBLE LOADING (BTU/SF)	DETECTION / SUPPRESSION	DUCTWORK GUAGE / ISOLATION VALVE	SAFE SHUTDOWN EQUIPMENT (20' RAD)
FD-W-1	40x46 BOT. EL. 275'-10	NNS	E-17(1X-NNS) E-18(1X-NNS) E-19(1X-NNS) E-20(1X-NNS)	EAST	1-A-BAL 1-A-4-COME	38,514	I,T / M(T)	16 / No	MCC-1A35-SA
	G-805 Rev 4			WEST	1-A-BAL 1-A-4-CHFA	114,699	I / None	16 / No	None
FD-W-2	20x14 BOT. EL. 272'-10	NNS	S-3(1A-NNS) S-3(1B-NNS)	EAST	1-A-BAL 1-A-4-COME	38,514	I,T / M(T)	20 / No	MCC-1A35-SA
	G-805 Rev 4			WEST	1-A-BAL 1-A-4-COMI	61,392	I,T / M(T)	20 / No	None
FD-W-3	20x14 BOT. EL. 272'-10	NNS	S-3(2A-NNS) S-3(2B-NNS)	EAST	1-A-BAL 1-A-4-COME	38,514	I,T / M(T)	20 / No	MCC-1A35-SA
	G-805 Rev 4			WEST	1-A-BAL 1-A-4-COMI	61,392	I,T / M(T)	20 / No	None
FD-W-4	30x24 ℄ EL. 270'-6	NNS	E-17(1X-NNS) E-18(1X-NNS) E-19(1X-NNS) E-20(1X-NNS)	NORTH	1-A-BAL 1-A-4-CHLR	155,296	I,T / M(T)	Transfer Grill / No	None
	G-505S01			SOUTH	1-A-BAL 1-A-4-TA	Negligible	Manual Alarm Sta. / None	Transfer Grill / No	None

TABLE 2

FIRE DAMPER DEVIATION

FLOOR ELEVATION +261'-0 (SEE ATTACHED FIGURE 9.5A-8)

HVAC DUCT PENETRATION I.D. NO.:	DUCT SIZE(IN) HVAC DWG CAR-2168	HVAC DUCT CATEGORY	HVAC SYSTEM		FIRE ZONE	FIRE ZONE COMBUSTIBLE LOADING (BTU/SF)	DETECTION / SUPPRESSION	DUCTWORK GUAGE / ISOLATION VALVE	SAFE SHUTDOWN EQUIPMENT (20' RAD)
FD-W-5	30x26 BOT. EL. 279'-2	NNS	E-17(1X-NNS) E-18(1X-NNS) E-19(1X-NNS) E-20(1X-NNS)	NORTH	1-A-BAL 1-A-4-CHLR	155,296	I,T / M(T)	16 / No	Chilled Water Pump P-4 (1A-SA) Closed Expansion Tank 1A-SA
	G-505S01 Rev 6			SOUTH	1-A-BAL 1-A-4-TA	Negligible	Manual Alarm Sta. / None	16 / No	Condensate Storage Tank 1X-SAB
FD-W-6	10x6 BOT. EL. 268'-3	SAFETY	E-6(1A-SA)	NORTH	1-A-BAL 1-A-34-RHXA	15,495	None / None	18 / No	RHR Heat Exchanger 1A-SA
	G-505S01 Rev. 6			SOUTH	1-A-BAL 1-A-4-CHLR	155,296	I, T / M(T)	18 / Yes	None
FD-W-7	10x6 BOT. EL. 268'-3	SAFETY	E-6(1A-SA)	NORTH	1-A-BAL 1-A-34-RHXA	15,495	None. / None	18 / No	RHR Heat Exchanger 1A-SA
	G-505S01 Rev. 6			SOUTH	1-A-BAL 1-A-4-CHLR	155,296	I, T / M(T)	18 / Yes	None
FD-W-8	10x6 BOT. EL. 268'-4	SAFETY	E-6(1B-SB)	NORTH	1-A-BAL 1-A-4-CHLR	155,296	I, T. / M(T)	18 / Yes	None
	G-505S01 Rev. 6			SOUTH	1-A-BAL 1-A-34-RHXB	Negligible	None / None :	18 / No	RHR Heat Exchanger 1B-SB

TABLE 2

FIRE DAMPER DEVIATION

FLOOR ELEVATION +261'-0 (SEE ATTACHED FIGURE 9.5A-8)

HVAC DUCT PENETRATION I.D. NO.:	DUCT SIZE(IN HVAC DWG CAR-2168	HVAC DUCT CATEGORY	HVAC SYSTEM	X	FIRE ZONE	FIRE ZONE COMBUSTIBLE LOADING (BTU/SF)	DETECTION / SUPPRESSION	DUCTWORK GUAGE / ISOLATION VALVE	SAFE SHUTDOWN EQUIPMENT (20' RAD)
FD-W-9	10x6 BOT. EL. 274'-5	SAFETY	E-6(1B-SB)	NORTH	1-A-BAL 1-A-4-CHLR	155,296	I, T / H(T)	18 / Yes	None
	G-505S01 Rev 6			SOUTH	1-A-BAL 1-A-34-RHXB	Negligible	None / None	18 / No	RHR Heat Exchanger 1B-SB

TABLE 2

FIRE DAMPER DEVIATION

FLOOR ELEVATION (SEE ATTACHED FIGURES 9.5A-9; 9.5A-15, 9.5B-1)

HVAC DUCT PENETRATION I.D. NO.:	DUCT SIZE(IN) HVAC DWG CAR-2168	HVAC DUCT CATEGORY	HVAC SYSTEM	X	FIRE ZONE	FIRE ZONE COMBUSTIBLE LOADING (BTU/SF)	DETECTION / SUPPRESSION	DUCTWORK GUAGE / ISOLATION VALVE	SAFE SHUTDOWN EQUIPMENT (20' RAD)
FD-W-10	60 x 24 BOT. EL. 328'-8" G-502503	SAFETY	AH-56 AH-57	ABOVE	12-A-7-HV	15,440	I / NONE	16 / YES	NONE
				BELOW	5-F-4-BAL	INSIGNIFICANT FHA 9.5A.14	NONE / NONE	16 / NO	NONE
FD-W-11	100 x 26 BOT. EL. 328'-8" G-501502	SAFETY	E-23 E-24	ABOVE	12-A-7-HV	15,440	I / NONE	16 / YES	NONE
				BELOW	5-F-4-BAL	INSIGNIFICANT FHA 9.5A.14	NONE / NONE	16 / NO	NONE
FD-W-12	100 x 26 BOT. EL. 328'-8" 5G-501502	SAFETY	E-25 E-26	ABOVE	12-A-7-HV	15,440	I / NONE	16 / YES	NONE
				BELOW	5-F-4-BAL	INSIGNIFICANT FHA 9.5A.14	NONE / NONE	16 / NO	NONE
FD-W-13	52 x 24 BOT. EL. 328'-8" 5-G-502503	SAFETY	AH-58 AH-59	ABOVE	12-A-7-HV	15,440	I / NONE	16 / YES	NONE
				BELOW	5-F-4-BAL	INSIGNIFICANT FHA 9.5A.14	NONE / NONE	16 / NO	NONE

TABLE 2

FIRE DAMPER DEVIATION

FLOOR ELEVATION (SEE ATTACHED FIGURES 9.5A-9, 9.5A-15, 9.5B-1)

HVAC DUCT PENETRATION I.D. NO.:	DUCT SIZE(IN HVAC DWG CAR-2168	HVAC DUCT CATEGORY	HVAC SYSTEM	X	FIRE ZONE	FIRE ZONE COMBUSTIBLE LOADING (BTU/SF)	DETECTION / SUPPRESSION	DUCTWORK GUAGE / ISOLATION VALVE	SAFE SHUTDOWN EQUIPMENT (20' RAD)
FD-73	18X18	NNS	E-11	ABOVE	5-F-3-NF	INSIGNIFICANT FHA. 9.5A. 14	NONE / NONE	16 / NO	NONE
				BELOW	5-F-2-DEC	SAME AS ABOVE	I / NONE	16 / No	NONE
FD-71	60X80 EL.286	NNS	E-17	ABOVE	12-A-5-CHF	82,242	I,T / P	16 / NO	NONE
				BELOW	1-A-4-CHFA	112,960	I,T / M	16 / NO	NONE
FD-72	60X80 EL.286	NNS	E-18	ABOVE	12-A-5-CHF	82,242	I,T / P	16 / NO	NONE
				BELOW	1-A-4-CHFA	112,960	I,T / M	16 / NO	MCC 1A-35 SA

TABLE 3
BUS DUCT SEAL DEVIATION

BUS DUCT PENETRATION I.D. NO.	DUCT SIZE	SSA SK.	FSAR FIG	FIRE ZONE	AUTOMATIC PROTECTION	COMBUSTIBLE LOADING (BTU/SF)	BUS DUCT GUAGE	SSA EQUIPMENT (20' RAD)
BD-1	22x16	S13	9.5A-8	1-A-4-CHLR	M,T,I	152,223	11	AH-19 1B-SB (LOCAL) AH-19 1A-SA (LOCAL) HVAC CHILLER WC-2 CW CIRC PUMP P-7
		S17	9.5A-9	1-A-SWGR A	I	32,207	11	480V SWGR 1A2-SA
BD-2	22x16	S13	9.5A-8	1-A-4-CHLR	M,T,I	152,223	11	AH-19 1A-SA (LOCAL) AH-19 1B-SB (LOCAL) HVAC CHILLER WC-2 CW CIRC PUMP P-7
		S17	9.5A-9	1-A-SWGR A	I	32,207	11	NONE
BD-3	33x12	S13	9.5A-8	1-A-4-CHLR	M,T,I	152,223	11	AH-19 1A-SA (LOCAL) AH-19 1B-SB (LOCAL) HVAC CHILLER WC-2
		S17	9.5A-9	1-A-SWGR A	I	32,207	11	6.9KV SWGR 1A-SA 480V SWGR 1A2-SA 480V SWGR 1A3-SA
BD-4	33x12	S13	9.5A-8	1-A-4-CHLR	M,T,I	152,223	11	AH-19 1A-SA (LOCAL) AH-19 1B-SB (LOCAL)
		S17	9.5A-9	1-A-SWGR A	I	32,207	11	6.9KV SWGR 1A-SA 480V SWGR 1A2-SA 480V SWGR 1A3-SA
BD-5	33x12	S13	9.5A-8	1-A-4-CHLR	M,T,I	152,223	11	AH-19 1A-SA (LOCAL) HVAC CHILLER WC-2
		N/A	9.5A-35	EL. 261 GND. FL.	M,T	78,478	11	NONE
BD-6	33x12	S13	9.5A-8	1-A-4-CHLR	M,T,I	152,223	11	AH-19 1A-SA (LOCAL)
		N/A	9.5A-35	EL. 261 GND. FL.	M,T	78,478	11	NONE

TABLE 3
BUS DUCT SEAL DEVIATION

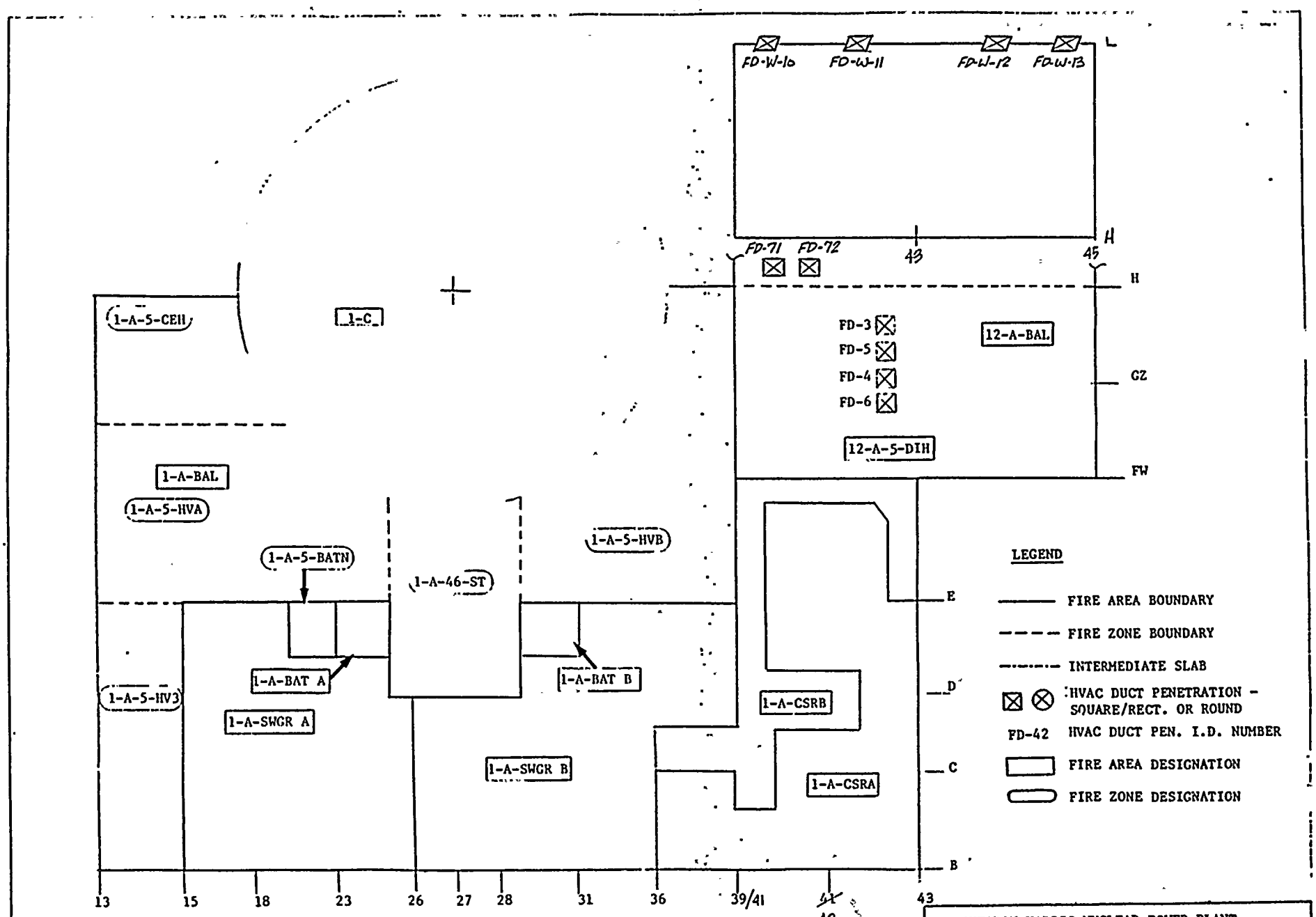
BUS DUCT PENETRATION I.D. NO.	DUCT SIZE	SSA SK	FSAR FIG	FIRE ZONE	AUTOMATIC PROTECTION	COMBUSTIBLE LOADING (BTU/SF)	BUS DUCT GUAGE	SSA EQUIPMENT (20' RAD)
BD-7	33x12	S13	9.5A-8	1-A-4-CHLR	M,T,I	152,223	11	3AF-F1-SA-1 3AF-F2-SA-1
		S17	9.5A-9	1-A-SWGR A	I	32,207	11	NONE
BD-8	33x12	S13	9.5A-8	1-A-4-CHLR	M,T,I	152,223	11	3AF-F1-SA-1 3AF-F2-SA-1
		S17	9.5A-9	1-A-SWGR A	I	32,207	11	NONE
BD-9	33x12	S13	9.5A-8	1-A-4-CHLR	M,T,I	152,223	11	3AF-F1-SA-1 3AF-F2-SA-1
		N/A	9.5A-35	EL.261 GND.FL.	M,T	78,478	11	NONE
BD-10	33x12	S13	9.5A-8	1-A-4-CHLR	M,T,I	152,223	11	3AF-F1-SA-1 3AF-F2-SA-1
		N/A	9.5A-35	EL.261 GND.FL.	M,T	78,478	11	NONE
BD-11	33x12	S13	9.5A-8	1-A-4-CHLR	M,T,I	152,223	11	3AF-F1-SA-1 3AF-F2-SA-1
		N/A	9.5A-35	EL.261 GND.FL.	NONE	78,478	11	NONE
BD-12	33x12	S13	9.5A-8	1-A-4-CHLR	M,T,I	152,223	11	3AF-F2-SA-1 3AF-F5-SB-1 3AF-F6-SB-1
		N/A	9.5A-35	EL.261 GND.FL.	NONE	78,478	11	NONE
BD-13	33x12	S13	9.5A-8	1-A-4-CHLR	M,T,I	152,223	11	3AF-F1-SA-1 3AF-F2-SA-1
		S17	9.5A-9	1-A-SWGR B	I	106,792	11	ESS SEQ PNL (1B-SB) 480V SWGR 1B3-SB
BD-14	33x12	S13	9.5A-8	1-A-4-CHLR	M,T,I	152,223	11	3AF-F2-SA-1 3AF-F5-SB-1 3AF-F6-SB-1
		S17	9.5A-9	1-A-SWGR B	I	106,792	11	ESS SEQ PNL (1B-SB) 480V SWGR 1B3-SB

TABLE 3
BUS DUCT SEAL DEVIATION

BUS DUCT PENETRATION I.D. NO.	DUCT SIZE	SSA SK	FSAR FIG	FIRE ZONE	AUTOMATIC PROTECTION	COMBUSTIBLE LOADING (BTU/SF)	BUS DUCT GUAGE	SSA EQUIPMENT (20' RAD)
BD-15	33x12	S013	9.5A-8	1-A-4-CHLR	M,T,I	152,223	11	AH-20 1A-SA (LOCAL) AH-20 1B-SB (LOCAL) 3AF-F5-SB-1 3AF-F6-SB-1
		S017	9.5A-9	1-A-SWGR B	I	106,792	11	NONE
BD-16	33x12	S13	9.5A-8	1-A-4-CHLR	M,T,I	152,223	11	AH-20 1A-SA (LOCAL) AH-20 1B-SB (LOCAL) 3AF-F5-SB-1 3AF-F6-SB-1
		S17	9.5A-9	1-A-SWGR B	I	106,792	11	NONE
BD-17	33x12	S13	9.5A-8	1-A-4-CHLR	M,T,I	152,223	11	AH-20 1A-SA (LOCAL) AH-20 1B-SB (LOCAL) 3AF-F5-SB-1 3AF-F6-SB-1
		N/A	9.5A-35	EL. 261 GND. FL.	M, T	78,478	11	NONE
BD-18	33x12	S13	9.5A-8	1-A-4-CHLR	M,T,I	152,223	11	AH-20 1A-SA (LOCAL) AH-20 1B-SB (LOCAL) 3AF-F5-SB-1 3AF-F6-SB-1
		N/A	9.5A-35	EL. 261 GND. FL.	M,T	78,478	11	NONE
BD-19	22x16	S13	9.5A-8	1-A-4-CHLR	M,T,I	152,223	11	AH-20 1A-SA (LOCAL) AH-20 1B-SB (LOCAL) CHILLED WATER PUMP P4 HVAC CHILLER WC-2 COND. WATER CIRC PUMP CLOSED EXP. TANK 1B-SB 3SW-V869 SB-1
		S17	9.5A-9	1-A-SWGR B	I	106,792	11	480V SWGR 1B2-SB

TABLE 3
BUS DUCT SEAL DEVIATION

BUS DUCT PENETRATION I.D. NO.	DUCT SIZE	SSA SK	FSAR FIG	FIRE ZONE	AUTOMATIC PROTECTION	COMBUSTIBLE LOADING (BTU/SF)	BUS DUCT GUAGE	SSA EQUIPMENT (20' RAD)
BD-20	22x16	S13	9.5A-8	1-A-4-CHLR	M,T,I	152,223	11	AH-20 1A-SA (LOCAL) AH-20 1B-SB (LOCAL) CHILLED WATER PUMP HVAC CHILLER WC-2
		S17	9.5A-9	1-A-SWGR B	I	106,792	11	NONE



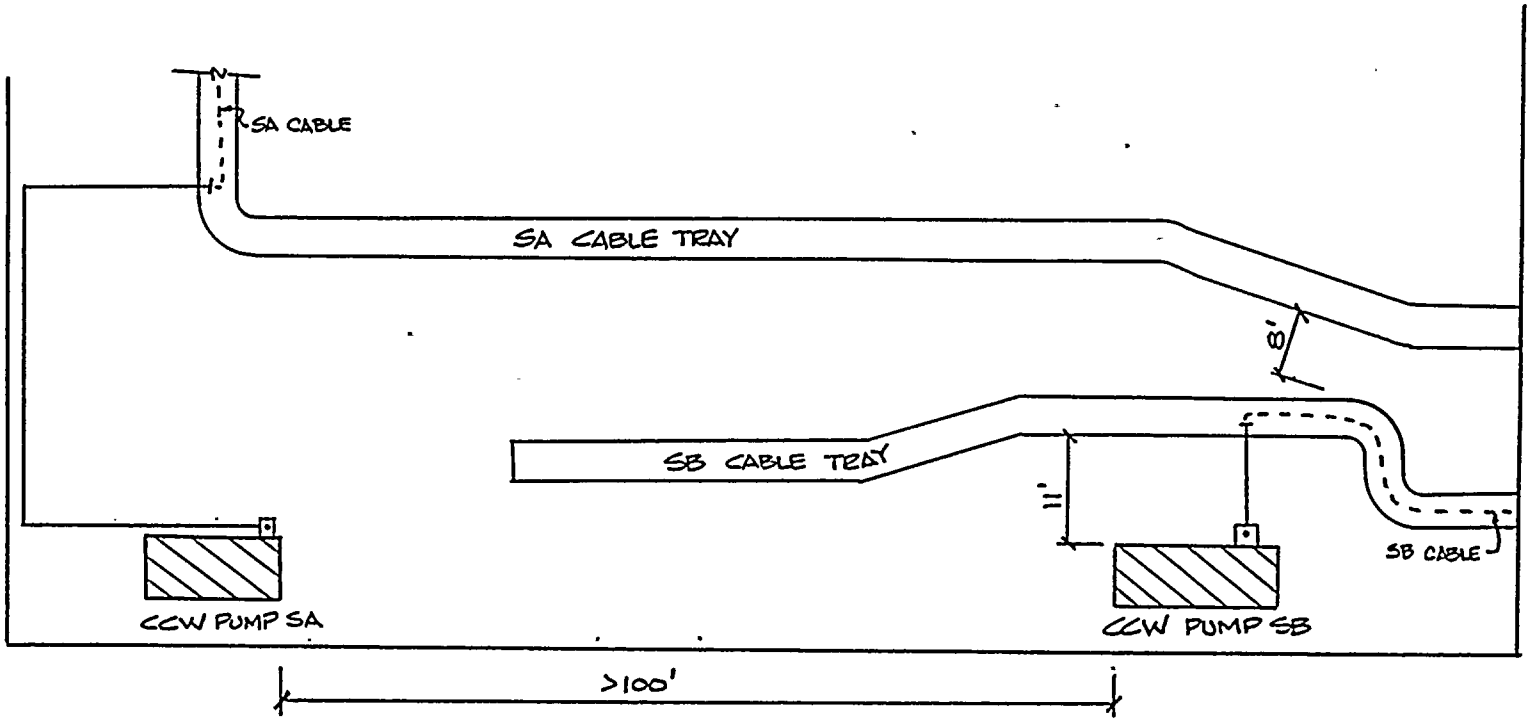
PLAN AT EL 286.00'

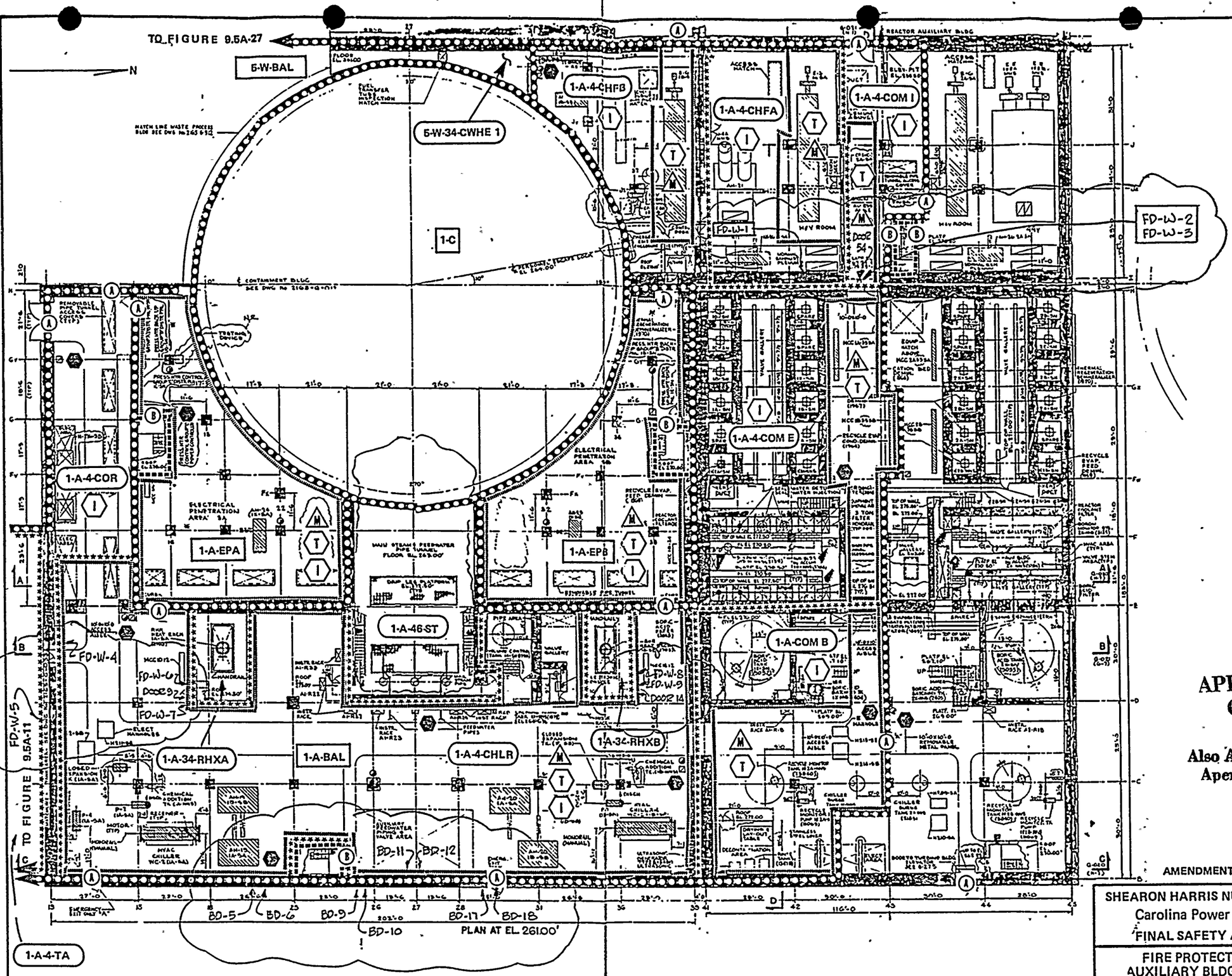
SHEARON HARRIS NUCLEAR POWER PLANT
Carolina Power & Light Company
FIRE DAMPER DEVIATION REQUEST STUDY

FIRE PROTECTION - REACTOR
AUXILIARY BLDG - PLAN EL. 286.00'
FIGURE 9.5B-1

FIGURE . 1

REACTOR AUXILIARY BUILDING
ELEVATION 236
FSAR FIGURE 9.5A-7





TI APERTURE CARD

Also Available On Aperture Card

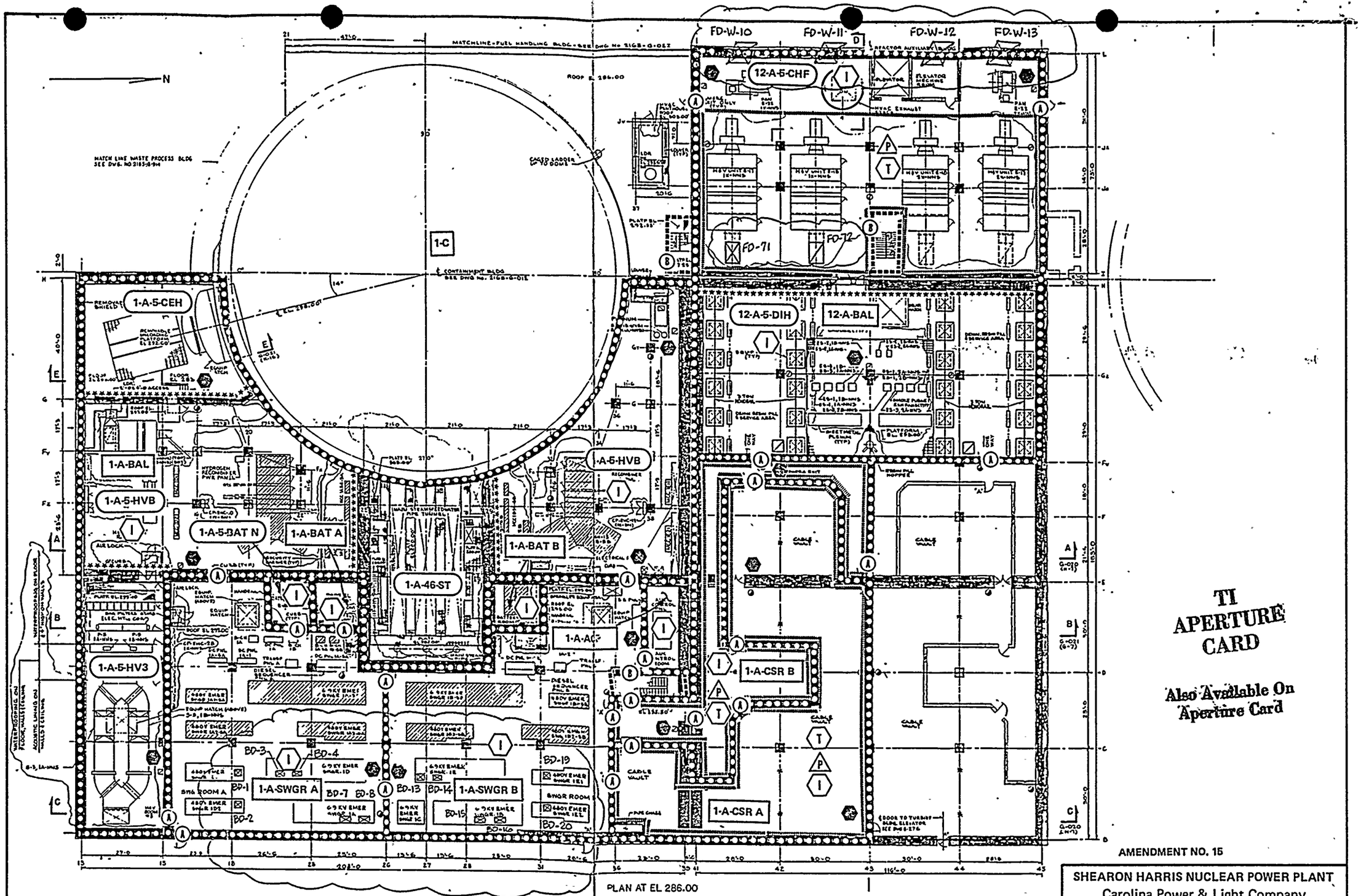
AMENDMENT NO. 15

SHEARON HARRIS NUCLEAR POWER PLANT
Carolina Power & Light Company
FINAL SAFETY ANALYSIS REPORT

FIRE PROTECTION – REACTOR AUXILIARY BLDG – PLAN EL 261.00'

FIGURE 9.5A-8

8606244265-01



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AMENDMENT NO. 15

SHEARON HARRIS NUCLEAR POWER PLANT
Carolina Power & Light Company
FINAL SAFETY ANALYSIS REPORT

FIRE PROTECTION – REACTOR AUXILIARY BLDG – PLAN EL 286.00'

FIGURE 9.5A-9

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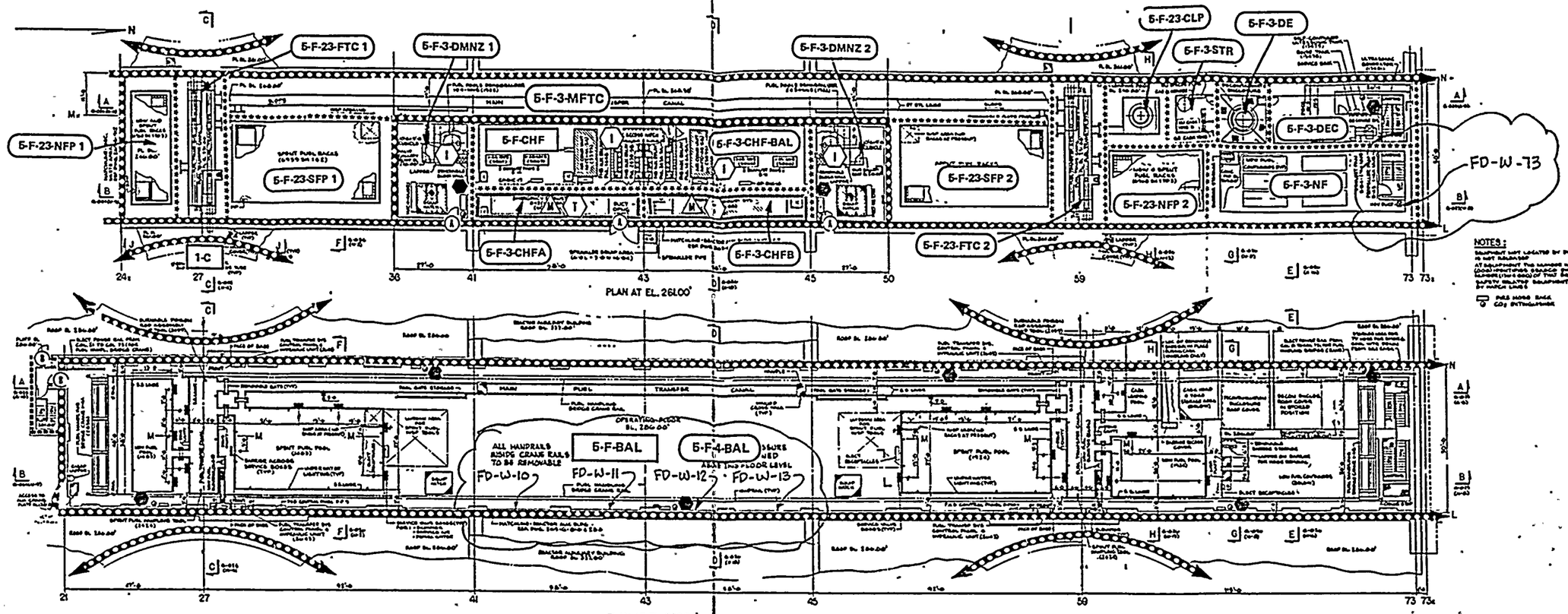

NOTES:

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AMENDMENT NO. 15

SHEARON HARRIS NUCLEAR POWER PLANT
Carolina Power & Light Company
FINAL SAFETY ANALYSIS REPORT

FIRE PROTECTION—FUEL HANDLING BUILDING—PLANS—SHEET 2

FIGURE 9.5A-15

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