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 FACIL: 50-259 Browns Ferry Nuclear Power Station, Unit 1, Tennessee 05000259  
 50-260 Browns Ferry Nuclear Power Station, Unit 2, Tennessee 05000260  
 50-296 Browns Ferry Nuclear Power Station, Unit 3, Tennessee 05000296

AUTH. NAME: MILLS, L. M. AUTHOR AFFILIATION: Tennessee Valley Authority  
 RECIP. NAME: DENTON, H. R. RECIPIENT AFFILIATION: Office of Nuclear Reactor Regulation, Director

SUBJECT: Forwards rev to 840327 revised App R submittal, correctly identifying items for which schedular exemption is requested.

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NOTES: NMSS/FCAF 1cy. 1cy NMSS/FCAF/PM. 05000259  
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	IE/WHITNEY, L		1 1		NRR FIORAVANT07		2 2
	NRR WAMBACH		1 0		NRR/DE/CEB 09		2 2
	NRR/DL DIR		1 1		<u>REG FILE</u> 04		1 1
	RGN2		1 1				
EXTERNAL:	ACRS 11		3 3		LPDR 03		1 1
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TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

June 5, 1984

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Denton:

In the Matter of the ) Docket Nos. 50-259  
Tennessee Valley Authority ) 50-260  
50-296

Please refer to my letter to you dated March 27, 1984, which contained our revised Appendix R submittal for Browns Ferry Nuclear Plant. Enclosed is a revision to attachment 8 of Volume 1 of our March 27 submittal. Due to an oversight on our part, we had not identified correctly all required modifications under the request for a schedular exemption. The enclosed revision correctly identifies those items which we are requesting a schedular exemption. Please replace the existing page with the enclosure.

If you have any questions, please get in touch with us through the Browns Ferry Project Manager.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

*L. M. Mills*  
L. M. Mills, Manager  
Nuclear Licensing

Subscribed and sworn to before  
me this 5<sup>th</sup> day of June 1984.

*Paulette H. White*  
Notary Public  
My Commission Expires 9-5-84

Enclosure  
cc: See page 2

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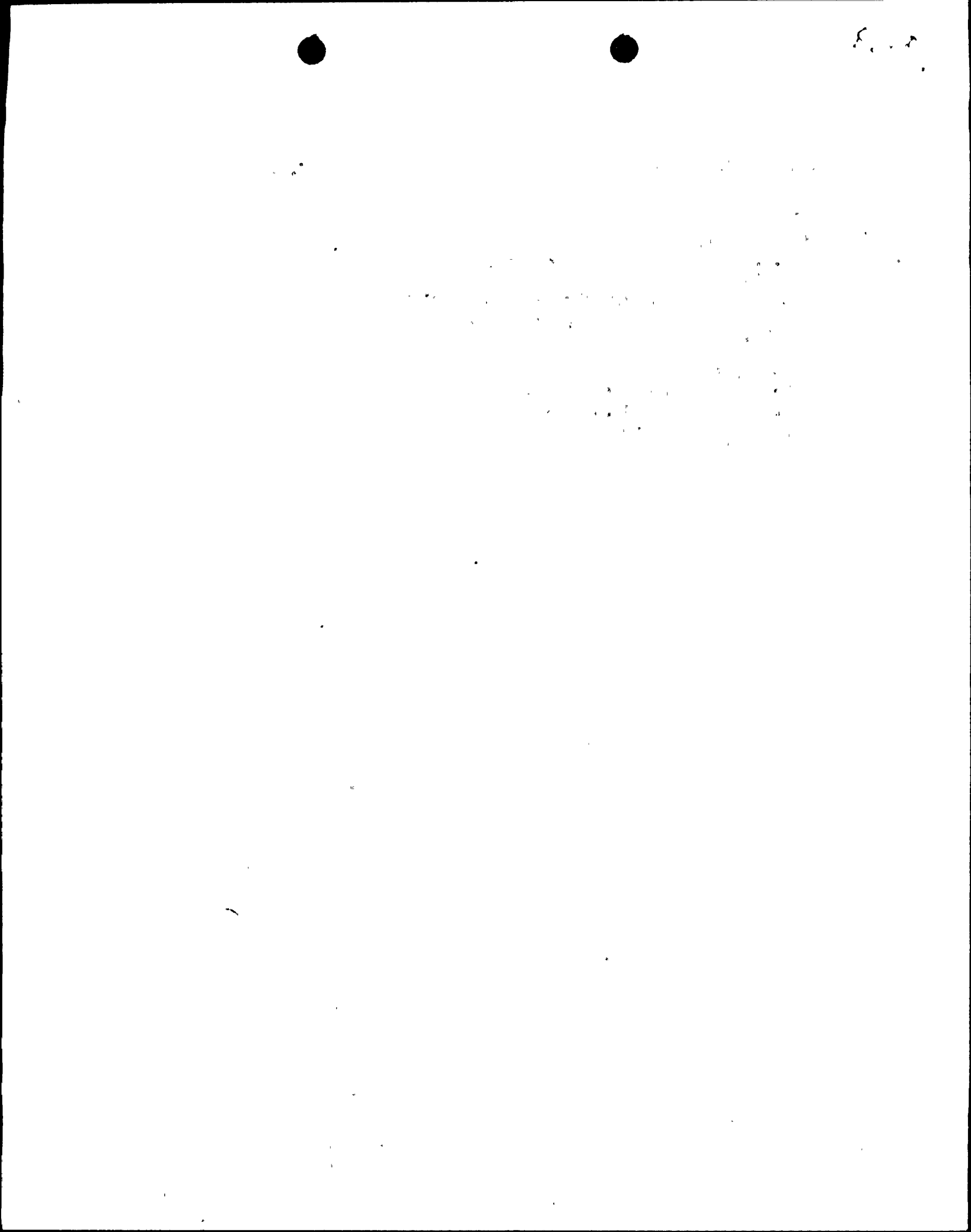
Mr. Harold R. Denton

June 5, 1984

cc (Enclosure):

- U.S. Nuclear Regulatory Commission  
Region II  
ATTN: James P. O'Reilly, Regional Administrator  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30303

Mr. R. J. Clark  
Browns Ferry Project Manager  
U.S. Nuclear Regulatory Commission  
7920 Norfolk Avenue  
Bethesda, Maryland 20814



ATTACHMENT 8  
EXEMPTION REQUESTS

R1



11



TVA requests NRC approval of the following exceptions to the requirements of 10 CFR 50.48 and Section III.G of Appendix R:

1. Exception - All modifications necessary to meet Appendix R will be implemented in accordance with the integrated schedule. Justification for the proposed Appendix R modification schedule will be included as part of the integrated schedule submittal. This schedule will not satisfy the requirements of Section 50.48(c).
2. Exception - Section III.G.2 requires 3-hour fire-rated separation between the three redundant battery and battery board room complexes located on elevation 593 of the control building. The walls around each complex are only 1-1/2-hour construction, and the structural steel is not coated. The battery and battery board complexes are separated from the cable spreading room on elevation 606 by 1-1/2-hour fire-rated construction. Since the spreading room is provided with total coverage by a preaction sprinkler system actuated by cross-zoned ionization smoke detectors, this degree of separation meets Section III.G.2 requirements and is not included in this exception.

Justification - The control building is separated from other areas of the plant by at least 3-hour fire-rated construction. The battery and battery board room complexes are separated from each other two 1-1/2-hour fire barriers and at least 90 feet of spacial separation (refer to drawings 47W216-3 and 47W216-7 in Volume 2, Tab 9). This level of separation is more than adequate considering the combustible loadings present.

Room(s)	Combustible Loading <sup>1</sup> (Btu/ft <sup>2</sup> )	Equivalent Fire Severity <sup>2</sup> (Minutes)
Instrument Shop, Office and Storage	5,100	4
Battery and Battery Board Complex 1	26,100	20
Unit 1 Auxiliary Instrument Room	21,800	17
Units 1 and 2 Computer Room	16,000	12
Unit 2 Auxiliary Instrument	21,800	17
Battery and Battery Board Complex 2	23,900	18
Communications Battery and Battery Board Rooms	18,000	14
Communications Room	2,800	2
Unit 3 Computer Room	11,900	10
Unit 3 Auxiliary Instrument Room	8,300	6
Battery and Battery Board Complex 3	23,900	18
Record Storage Room and Mechanical Equipment Room	11,200	8
Corridor	No Significant Combustibles	