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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 HUFHAM, J.W. AUTHOR AFFILIATION Tennessee Valley Authority
RECIP.NAME DENTON, H.R. RECIPIENT AFFILIATION Office of Nuclear Reactor Regulation, Director

SUBJECT: Forwards results of evaluation of impact of fire door mods,
per Exemption 15. All gasket matl will be replaced by labeled
gasketing mats & plastic signs replaced w/metal signs
mechanically fastened.

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TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
1630 Chestnut Street Tower II

February 22, 1985

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)
Tennessee Valley Authority) Docket Nos. 50-259
50-260
50-296

Please refer to L. M. Mills' letter to you dated October 31, 1984 regarding Appendix R to 10 CFR 50, Fire Protection, for our Browns Ferry Nuclear Plant. As committed in that letter, enclosed are the results of an evaluation of the impact of the fire door modifications for exemption No. 15 of our October 31 submittal. Bill Long of your staff and Mike Hellums of my staff discussed submitting this information to the NRC by February 22, 1985.

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

Very truly yours,

TENNESSEE VALLEY AUTHORITY

J. W. Hufham
J. W. Hufham, Manager
Licensing and Regulations

Subscribed and sworn to before
me this 22nd day of Feb. 1985.

Paulette N. White
Notary Public
My Commission Expires 8-24-88

Enclosure

cc (Enclosure):

U.S. Nuclear Regulatory Commission
Region II
ATTN: James P. O'Reilly, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

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

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ENCLOSURE

FIRE DOOR MODIFICATION EVALUATION

REFERENCE: J. W. HUFHAM'S LETTER TO E. ADENSAM
DATED JANUARY 4, 1985, SUBJECT, WATTS BAR NUCLEAR PLANT
APPENDIX R FIRE PROTECTION

TVA has surveyed the fire doors at BFN that have been modified or changed in some way from the original Underwriters' Laboratories (UL) rating criteria. An inspection of the fire doors was performed utilizing information obtained from a similar walkdown with representatives from UL at the Watts Bar Nuclear Plant. The results of that inspection are contained in the referenced letter.

The following is the summary of criteria used in the BFN investigation based on guidelines recommended by UL for WBN.

1. All gasket material will be replaced by labeled gasketing materials.
2. All plastic signs removed and replaced with metal signs mechanically fastened, or the information may be stenciled on the door.
3. Replace missing screws for metal signs.
4. All doors should have proper fit in frame with maximum clearance of 1/8 inch.
5. Some of the doors are equipped with clasp and staple type lock. If these are no longer needed, they should be removed and the holes repaired accordingly.
6. All door frames will be modified as recommended by UL.
7. Where frame is penetrated by conduit two things are necessary:
 - a. A split sleeve must be mounted into frame
 - b. Conduit must be filled with RTV 800 sealant for a distance of 18 inches from frame penetration.
8. All doors and frames must have labels on them.
9. Any door silencer that is missing should be replaced.
10. Small holes in door may be filled by a sheet metal screw. No plate may be welded over a hole in the door. The door will have to be replaced if larger holes are found. Holes in frames may be repaired using either sheet metal screws or welding a 16-gauge plate over the hole.

However, TVA proposes not to comply with items 1, 2, and 8 of the UL recommendations. These three items have been previously addressed in the referenced WBN letter as being unnecessary.

As a result of the investigation, six doors and four door frames will have to be replaced, and several doors and door frames will need small repairs because of holes or modifications that have been made. TVA is in the process of doing an engineering evaluation on the door replacement and the frame work. These modifications will be performed in accordance with the integrated schedule for Appendix R.

It is TVA's position that, with the implementation of the corrective actions, the fire doors will be restored to a labeled configuration.

