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SUBJECT: . Advises of change in position re Branch Technical Position
 CMEB 9.5-1, Position C.5.6.2(c) for three fire zones. Util
 intends to enclose minority div essential raceways located
 in each zone in fire barriers having 1-h rating.

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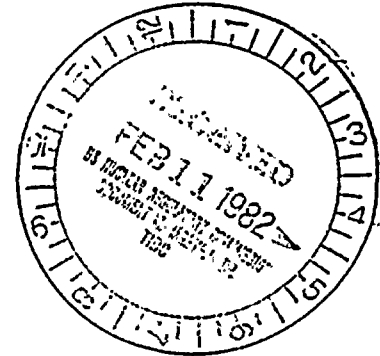
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February 9, 1982

Mr. A. Schwencer, Chief
Licensing Branch No. 2
Division of Project Management
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555



SUSQUEHANNA STEAM ELECTRIC STATION
FIRE PROTECTION-REQUEST FOR VARIANCE
ER 100450 FILE 841-2
PLA - 1013

DOCKET NOS. 50-387 and 50-388

Dear Mr. Schwencer:

This letter documents a change in PP&L's position regarding Branch Technical Position CMEB 9.5-1, Position C.5.b.2(c) for three fire zones at the Susquehanna Steam Electric Station. In each case, it is PP&L's intention to enclose minority division essential raceways located in each zone in fire barriers having a one-hour rating. However, only manual suppression and detection are planned in these zones. A detailed discussion of each fire zone follows:

1. Fire Zone 0-28B Equipment Room (El. 771'-0" to 781'-11")

This zone has been discussed in two previous letters: PLA-683 dated March 26, 1981 and PLA-948 dated October 26, 1981. Originally, PP&L committed to two alternative methods for protecting essential safe shutdown raceways from transient combustibles: (1) wrapping the minority raceways with a one-hour wrap material, or (2) providing a one-hour rated false ceiling. Both of these alternatives are documented in Revision 1 to the Fire Protection Review Report. PLA-683 committed PP&L to providing a two-hour rated false ceiling prior to fuel loading. This alternative was selected because at the time no material had been identified which could be utilized as a one-hour wrap for cable capable of preserving the ampacity rating of the cable in the event of a fire. Recently, two such materials have been tested and NRC has indicated acceptance of TSI THERMO-LAG for this application at Texas Utilities Generating Company's Comanche Peak, Docket Nos. 50-445 and 50-446 (Reference NRC letter dated December 1, 1981, Mr. R. L. Tedesco to Mr. R. J. Gary). PLA-948 provided test reports on materials manufactured by Quelcor, Inc. for your approval for use as a wrapping material.

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As stated in PLA-948, PP&L considers a one-hour wrap sufficient to satisfy the original intent of the NRC for protection of essential safe shutdown raceways in the equipment room (Fire Zone 0-288). The zone contains safety related load centers and miscellaneous battery chargers and distribution panels. Two-hour rated barrier walls

separate equipment by division and all cabling in the zone is enclosed in conduit. The combustible loading for the zone is 0.04 lbs. equiv. WD per sq. ft. floor area. Manual suppression equipment and ionization detectors are provided in the zone. It is PP&L's belief that when the combustible loading and reasonable transient combustibles are considered, fire detection, manual fire suppression, and one-hour rated cable enclosures without automatic suppression provide adequate protection for essential safe shutdown cables.

2. Fire Zone 1-2D Remote Shutdown Panel (El. 670'-0" to 683'-0")

This zone consists of one room (approximately 14' x 25') housing various control cables and the unit's remote shutdown panel. Approximately 75% of the cabling in the zone is contained in conduit. The minority division essential raceways located in the zone consist of control cable for the engineered safeguard service water system. The combustible loading for the zone is 1.43 lbs equiv. WD per sq. ft. floor area (Equivalent fire severity: 5 minutes). Manual suppression equipment and ionization smoke detectors are provided in the zone.

It is PP&L's belief that when the combustible loading and reasonable transient combustibles are considered, fire detection, manual fire suppression, and one-hour rated cable enclosures without automatic suppression provide adequate protection for essential safe shutdown cables.

3. Fire Zone 0-28H Cold Instrument Repair Shop (El. 771'-0" to 781'-11")

This zone consists of one room (approximately 20' x 50') housing various cables in conduit and the cold instrument repair facility. The minority division essential raceways are located above a non-rated false ceiling and are run in conduit. The combustible loading for the zone is 0.48 lbs. equiv. WD per sq. ft. floor area. Manual suppression and ionization detectors are provided for the zone. Although indicated in the Fire Protection Review Report, automatic suppression is no longer planned for this zone.

It is PP&L's belief that when the combustible loading and reasonable transient combustibles are considered, fire detection, manual fire suppression, and one-hour rated cable enclosures without automatic suppression provide adequate protection for essential safe shutdown cables.

These changes will be implemented in the near future. Should you have any questions, please contact us as soon as possible.

Very truly yours,



N. W. Curtis
Vice President-Engineering & Construction-Nuclear

cc: R. Perch - USNRC



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