

May 1, 1985

Mr. Stuart D. Ebnetter, Director
Division of Reactor Safety
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Re: Nine Mile Point Unit 1
Docket No. 50-220/65-01
DPR-63

Dear Mr. Ebnetter:

Your April 2, 1985 letter and its attachment provided the results of the January 21-25, 1985 inspection conducted at Nine Mile Point Unit 1. The inspection included the safe shutdown capability of Nine Mile Point Unit 1 in the event of a fire. Our responses to the inspection's Deviation and Unresolved Items are detailed in the attached report.

Sincerely,

NIAGARA MOHAWK POWER CORPORATION



T. E. Lempges

Vice President, Nuclear Generation

DAC/ca
Attachment

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ATTACHMENT

Response to Inspection 50-220/85-01, Safe Shutdown Capability
in the Event of a Fire

1.0 Unresolved Item 50-220/85-01, Deviation from a Licensing Commitment

1.1 NRC Description:

As a result of an inspection conducted on January 21-25, 1985, and in accordance with NRC Enforcement Policy (10 CFR 2, Appendix C) published in the Federal Registrar on March 8, 1984 (49 FR 8583) the following deviation from a licensing commitment was identified:

The Final Safety Analysis Report (FSAR), Section X.K, paragraph 4.0, states that all fire protection components are designed and installed in accordance with the applicable standards of the National Fire Protection Association (NFPA). NFPA Standards 20 and 803 require that the diesel fire pump be separated from the electric fire pump by a 3 hour fire barrier.

Contrary to the above, the diesel fire pump is not separated from the electric fire pump in that their control cables are installed in a common tray located at elevation 261 feet of the Screen and Pump House without any fire barrier separation in between.

Niagara Mohawk Power Corporation is hereby requested to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: 1) the corrective steps which have been taken and the results achieved; 2) corrective steps which will be taken to avoid further deviations; and 3) the date when full compliance will be achieved.

Section 10 - Inspection of Records

10.1 The records of the Commission shall be open to inspection by any person at any time and place.

10.2 The Commission shall, on request, furnish to any person a copy of any record in its possession or control, subject to payment of the cost of reproduction.

10.3 The Commission shall, on request, refer any person to the person or persons to whom the records are held.

10.4 The Commission shall, on request, refer any person to the person or persons to whom the records are held.

10.5 The Commission shall, on request, refer any person to the person or persons to whom the records are held.

1.2 Response:

1.2.1 Corrective steps which have been taken and the results achieved:

The diesel engine driven fire pump circuits for remote manual starting and indication will be modified by installing interposing relays and separately fusing the circuit. The loss of tray 11TM2 will render the electric fire pump inoperable and will cause loss of only one of the two sources of control power for the fire pump controller. The redundant unaffected control power supply in conduit primarily run in the 261 feet elevation floor slab would provide control power for automatic operation (low water pressure, low air start) or local manual start of the diesel engine driven fire pump. Additionally, approximately four feet of that conduit not run in the 261 feet elevation floor slab will be enclosed in a three-hour fire barrier.

The redesign described above has been completed, except for the three-hour enclosure for the partially exposed conduit. Installation is currently planned to be completed by September 30, 1985.



The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that proper record-keeping is essential for the success of any business and for the protection of the interests of all parties involved.

In the second part, the author outlines the various methods used to collect and analyze data. This includes a detailed description of the sampling process and the statistical techniques employed to interpret the results. The goal is to provide a clear and concise summary of the findings.

The third section focuses on the implications of the research. It discusses how the findings can be applied in real-world scenarios and offers suggestions for further research. The author also addresses any limitations of the study and provides a final conclusion.

Finally, the document includes a list of references and a bibliography. These sources provide additional information and context for the research presented in the paper. The references are carefully selected to support the author's arguments and conclusions.



1.2.2 Corrective steps which will be taken to avoid further deviations:

The redesign of control circuitry for Nine Mile Point Unit 1 fire pumps is not expected to occur on a continuing basis. In general, however, modifications to those systems described in our FSAR, in accordance with 10CFR50.59, require a Safety Evaluation. This evaluation includes a fire protection check list, and as necessary, this check list is reviewed by our Fire Protection Supervisor.

1.2.3 Date when full compliance will be achieved

By the modification described in 1.2.1 above, the diesel fire pump and electrical fire pump control cables installed in a common tray located in the Screen and Pump House will be in compliance with the NFPA 20 and 803 separation criteria by September 30, 1985.

2.0 Unresolved item 50-220/85-01-02, Adequacy of Fire Protection for Redundant Safe Shutdown Trains in Reactor Building

2.1 NRC Description:

The licensee established several fire break zones (FBZs) in the Reactor Building to provide 20 feet of separation between the redundant trains of safe shutdown systems in accordance with Appendix R, Section III.G.2.b. The FBZs are provided with automatic

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suppression and detection. The FBZs are generally but not completely free of intervening combustibles, in that they contain some limited amount of combustibles such as flamastic coated cables.

Smoke detection is provided throughout the Reactor Building. However, automatic suppression has not been provided through the Reactor Building, as clarified by Generic Letter 83-33. By letter dated December 26, 1983, the licensee requested an exemption for the lack of area wide automatic suppression. Subsequently, in an Appendix R Lessons Learned Regional Workshop held on April 18, 1984, NRC provided additional clarification that less than full area wide suppression and detection may also be acceptable provided that the licensee performs an evaluation to justify its adequacy and retains the evaluation for subsequent NRC audits. Accordingly, the licensee made the required evaluation and by letter dated May 11, 1984, withdrew the above exemption request.

The licensee's evaluation included technical justification for not providing area wide automatic suppression throughout the Reactor Building and for the presence of intervening combustibles in the FBZs. The team reviewed the evaluation and found additional information would be required to resolve this item. The licensee verbally committed to provide the additional information to NRR. This item remains unresolved pending receipt and review of the information and resolution of the issue by NRR (50-220/85-01-02).

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2.2 Response:

Niagara Mohawk's February 11, 1985 letter and its attachments were submitted to NRR providing the additional information requested by the inspection team.

3.0 Unresolved Item 50-220/85-01-03, Security Modifications to Fire Doors

3.1 NRC Description:

The licensee has provided 3-hour fire rated barriers to separate redundant safe shutdown trains in accordance with Appendix R, Section III.G.2.a. However, certain 3-hour fire rated doors (23 doors with Serial Numbers: D18, 150, 227, 116, 165, 9, 24, 52-2, 86, 105, 106, 109, 110-1, 110, 111-4, 117, 74, 112, 113, 114, 115, 52, and 56) installed in the barriers have been modified by the installations of security hardware. These modifications may have degraded the fire rating of the doors. The licensee could not provide the team with an evaluation of their fire rating. However, the licensee committed to having Underwriters Laboratories (UL) inspect the doors and make an evaluation and to upgrade the ratings, if and where necessary. This is an unresolved item pending completion of the above licensee action and its review by NRC (50-220/85-01-03).

submitted to NRR providing additional information requested by the Commission.

1. The Commission has received information that the applicant is a resident of the United States.

The Commission has reviewed the information provided and has determined that the applicant is eligible for the program. The Commission has also reviewed the applicant's financial records and has determined that the applicant is financially sound. The Commission has also reviewed the applicant's criminal record and has determined that the applicant has no criminal record. The Commission has also reviewed the applicant's employment history and has determined that the applicant has a stable employment history. The Commission has also reviewed the applicant's credit history and has determined that the applicant has a good credit history. The Commission has also reviewed the applicant's tax records and has determined that the applicant is in compliance with tax laws. The Commission has also reviewed the applicant's social security records and has determined that the applicant is in compliance with social security laws. The Commission has also reviewed the applicant's health insurance records and has determined that the applicant has adequate health insurance coverage. The Commission has also reviewed the applicant's life insurance records and has determined that the applicant has adequate life insurance coverage. The Commission has also reviewed the applicant's other financial records and has determined that the applicant is financially sound. The Commission has also reviewed the applicant's other information and has determined that the applicant is eligible for the program. (The Commission has also reviewed the applicant's other information and has determined that the applicant is eligible for the program.)

3.2 Response:

Underwriters Laboratories (UL) inspected the Nine Mile Point Unit 1 rated fire doors on March 6 and 7, 1985. UL inspected approximately 215 doors. They compared their design, installation and configuration to established design and testing criteria. Several of these doors have been identified as having potentially invalid UL labels. Therefore, this report also serves to satisfy the requirements of our Technical Specification, Sections 3.6.10.1(d) and 6.9.2(b).

The 23 doors identified in your finding (85-01-03) were included in this inspection, except for the door with serial number 116. That door is not required to be a three-hour fire rated door.

Niagara Mohawk is currently evaluating the UL report. The report will serve as a basis for determining modifications of existing doors, further evaluations to justify existing configurations, or tests to justify existing configurations.

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4.0 Unresolved Item 50-220/85-01-04, Enhancement of Illumination Level
Provided by Emergency Lighting

4.1 NRC Description:

The licensee has provided the required emergency lighting to all areas inspected by the team among these areas needed for operation of the safe shutdown equipment and in access and egress routes thereto. However, the team felt that illumination level provided by the installed emergency lighting may be marginal in some of these areas and additional emergency lighting may be desirable for safe shutdown of the plant in the event of a fire. The licensee agreed to study the need for additional lighting by using operators to walk down the safe shutdown procedures and committed to provide additional lighting wherever necessary. This is an unresolved item pending completion of the above licensing action and its review by NRC (50-220/85-01-04).

4.2 Response:

Preliminary walkdowns and designs for additional emergency lighting have been completed by our engineering staff. Key areas of the safe shutdown procedures will be walked down to assess the need for additional emergency lighting. These walkdowns will be performed by Engineering with the assistance of Operations, Fire Department and Electrical Maintenance personnel. Any additional emergency lighting necessary will be installed by February 28, 1986.

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