

SUPPLEMENT TO THE  
FIRE PROTECTION  
SAFETY EVALUATION REPORT  
IN THE MATTER OF  
CONSUMERS POWER COMPANY  
PALISADES PLANT  
DOCKET NO. 50-255

3.2.1 Cable Penetration Firestop Qualification

Our SER noted that the licensee would provide results of tests to demonstrate the ability of existing and new cable penetration firestop designs to prevent propagation of a severe fire equivalent to an ASTM E-119 exposure fire. By letter of September 29, 1978, Consumers Power Company provided results of testing of various cable penetration firestop designs. Although these tests were not performed with a significant pressure differential across the seal with the higher pressure on the exposed side, we find that such conditions would not affect the ability of these firestops to withstand a severe fire. We have reviewed this test data and find that these tests demonstrate the ability of the tested firestop designs to withstand an ASTM E-119 3-hour exposure fire. Based on these results, we find that the tested firestop designs satisfy the provisions of Appendix A to BTP9.5-1 and are therefore acceptable.

As noted in Section 3.1.3, the licensee has committed to install and upgrade cable penetration firestops that are consistent with the tested designs. Accordingly, this item has been satisfactorily resolved.

3.2.2 Administrative Controls

Responsibility for completing the review of the licensee's administrative controls for fire protection and resolving this item was transferred to the Office of Inspection and Enforcement.

3.2.3 Technical Specifications

Our SER noted that technical specifications would be developed for those components upon which primary reliance is placed to achieve safe shutdown in a fire situation and which are presently not required by technical specifications. This concern was identified in reviewing certain of the initial details for the proposed alternate shutdown system. These details indicated that certain equipment not required to be operable by technical

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specifications may be used for the alternate shutdown system. Subsequently the review of the alternate shutdown system has been deferred to the Systematic Evaluation Program (SEP). This review will assure that our position, including required technical specifications, is satisfied. Accordingly, this item is acceptably resolved for those areas that rely on the alternate shutdown system.

Additionally, the licensee has reviewed the fire hazards analysis to assure that primary reliance to achieve safe shutdown is only placed on equipment that is required to be operable by the technical specifications. By letter of September 29, 1978, the licensee provided the results of this review which indicated that existing technical specifications adequately address the operability requirements of equipment required to achieve and maintain safe shutdown, with the exception of the specifications on the auxiliary feedwater system. The existing technical specifications require as a limiting coordination for operation that only one auxiliary feedwater pump and one fire pump be operable to provide a supply of feedwater to the steam generators. The licensee has indicated that these specifications will be revised to the Standard Technical Specifications (STS); however, this may not occur for some time.

Until these specifications are upgraded to the STS, if a fire were to occur that caused loss of the only operable auxiliary feedwater pump, the fire pump may not have sufficient capacity to satisfy both fire protection and feedwater demands. Accordingly, the licensee proposes to revise technical specification 5.1.a to require operability of both auxiliary feedwater pumps. Subject to issuance of such a specification, this item is satisfactorily resolved.

#### 3.2.4 Fire Brigade

Our evaluation on the minimum required fire brigade shift size was sent to the licensee by letter of September 7, 1979. Additionally, this requirement is now included in Appendix R to 10 CFR Part 50 which will become effective in the near future. We, therefore, expect that the licensee will conform to this requirement. Subject to conformance to this requirement, this item is satisfactorily resolved.

### 3.2.5 Non-Approved Components

Our SER noted that certain fire detectors were being used in the fire detection system that were not approved by a recognized testing laboratory. By letters of July 28, 1978 and September 15, 1978, the licensee indicated that fire detector spacing and location will be in accordance with NFPA-72E, "Automatic Fire Detection." Although in certain locations photo-electric type detectors are being used that are not approved by a recognized testing laboratory, we find that sufficient other type detectors that are approved by a recognized testing laboratory will be used to afford prompt detection capability. We find that the fire detection system satisfies the guidance contained in Section 2.0 of our SER and is therefore acceptable.