

February 14, 1985



VIRGINIA POWER

Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555
Attn: Document Control Desk

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Dear Mr. Denton:

VIRGINIA POWER
COMMENTS ON THE NRC FIRE PROTECTION
POLICY STEERING COMMITTEE REPORT
(GENERIC LETTER 85-01)

Virginia Power appreciates the opportunity to comment on the NRC Fire Protection Policy Steering Committee's report. We have reviewed the policy recommendations and have general comments. Because the comment period was established in a Federal Register notice separate from the generic letter, we have had only limited opportunity to develop detailed comments. However, the comments offered below focus more on the approach we believe the Commission should take in achieving the fire protection goals stated in Mr. Dirck's September 13, 1984, memorandum - expediting Appendix R compliance and assuring consistent levels of fire protection safety - than on the specific mechanisms for doing so.

We are not insensitive to NRC's resolve in achieving its stated goals; rather, we share them. Virginia Power has expended significant resources in improving fire protection safety at its four operating plants. Since October, 1983, we've spent \$22 million on Appendix R and anticipate spending another \$6 million. And, we share in the frustration of resolving the complex fire protection issues in a timely manner.

As an example of this frustration, the NRC conducted a series of Regional workshops in early 1984 to help resolve any misunderstandings associated with Appendix R requirements. The latest, and it was hoped, final guidance on the subject was to be issued subsequent to the workshops. This effort was welcomed by industry. Yet nearly a year later, the guidance continues to be revised, and has again been disseminated for comment as part of Generic Letter 85-01.

This example illustrates our primary concern: based on our experience, Appendix R (and fire protection in general) is a living, evolving issue that does not lend itself to definitive guidance nor swift compliance. We are both encouraged and concerned as a result of our review of the Steering Committee's policy recommendations that the NRC shares this view.

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Mr. Harold R. Denton



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We are encouraged by such recommendations as: establishing referees to resolve significant differences that arise during inspections, inspection team workshops, expediting inspections to obtain a clearer understanding of the status of industry in achieving compliance, and designating a central point of contact within NRC to resolve internal conflict. We believe that recommendations such as these reflect not only our experience with fire protection, but indicate that NRC also recognizes that guidance must continue to evolve, that interpretations will change, and that exceptions to the regulations will arise and need to be addressed.

On the other hand, we are concerned by such recommendations as: elimination of schedular exemptions, more aggressive and expedited enforcement actions, and more regulation (i.e. standard license conditions) and apparent new requirements (e.g. meeting GDC-1). We believe that recommendations such as these fail to recognize the nature of the fire protection issue. It is not reasonable to expect that fire protection issues will be resolved and compliance will be achieved solely through mandate. The history of fire protection in the nuclear industry provides ample evidence to support this. Rather, they will be resolved and achieved through better understanding and continued active communication between NRC and industry. The issuance of the Steering Committee's policy recommendations for comment is a positive step in that direction and we encourage the NRC to continue in this manner.

Virginia Power is committed to assuring that our operating plants are capable of being safely shut down and maintained in a safe condition in the event of a fire. We have maintained active formal and informal communications with the NRC as we strive to resolve any remaining fire protection issues and meet the applicable requirements. We will continue in this manner, and we encourage the NRC to adopt the Steering Committee's policy recommendations that support resolution of fire protection issues through understanding and communications.

Very truly yours,

W. L. Stewart

cc: Dr. J. Nelson Grace
Regional Administrator
Region II

Mr. Thomas E. Conlon
Section Chief
Plant Systems Section
Region II