



Carolina Power & Light Company

March 22, 1979

FILE: NG-3514(B)

SERIAL: GD-79-785

Office of Nuclear Reactor Regulation
ATTENTION: Mr. T. A. Ippolito, Chief
Operating Reactors Branch No. 3
United States Nuclear Regulatory Commission
Washington, D. C. 20555

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DPR-62
FIRE PROTECTION PROGRAM

Dear Mr. Ippolito:

Our letter of March 15, 1979, provided supplemental information requested by the NRC staff concerning the fire protection program at our Brunswick Steam Electric Plant. Subsequent to that letter, telephone conversations with members of the NRC staff resulted in a request for additional clarifying information on two specific items: acceptance tests on the remote shutdown modifications and fire doors to the loading dock. Enclosure 1 to this letter is a supplemental response to Item 10.g of Attachment 2 to our March 15 letter and discusses the acceptance tests. Enclosure 2 supersedes and replaces the discussion in Attachment 1 of our March 15 letter concerning Fire Area IV.C.3.f.14, p. 1.

If you have any questions concerning this material, please contact our staff.

Yours very truly,

E. E. Utley
Senior Vice President
Power Supply

DLB/mf
Enclosures

7903280286

Hook
5/11
F

Fire Area: (IV.C.3.f.14, p. 1)

Modifications to be Performed/SER Reference:

1. Fire doors to loading dock/No SER reference
2. Fixed suppression/3.1.11

Modifications not Completed by End of 1979 Refueling Outage/Completion Date

1. Fire doors to loading dock/proposal for deletion
2. Fixed suppression/July 27, 1979

Discussion/Justification for Unit Startup with Incomplete Modifications:

1. In our Fire Protection Program Review report of January 1, 1977, we stated that the doors opening onto the loading dock area would be upgraded to three-hour fire rated doors. The loading dock area is external to the plant area, and thus a fire in the immediate radwaste building area of the loading dock area would not have any effect on other plant areas required for safe shutdown of the plant. In addition, further review of fire protection requirements by the NRC staff and CP&L subsequent to submittal of the Program Review Report established that a fire involving all of the combustibles in the Radwaste Building would result in releases that are only a small fraction of 10CFR100 limits (Ref. CP&L submittals of October 14, 1977, and December 8, 1977). In addition, installation of a fixed suppression system in the area containing transient combustibles was also committed to during review by the NRC staff. Also, the Safety Evaluation Report issued by the NRC on November 22, 1977, does not require upgrading of the loading dock doors.

As a result, CP&L believes that the requirements of BTP 9.5-1, Appendix A, Page 45, Paragraph D.14 are adequately met and that upgrading of the fire resistance of the loading dock doors is not necessary. Therefore, we propose to delete this modification.

2. The fixed suppression system will not be completed prior to startup of Unit 1. However, hose racks, detectors and portable extinguishers are available in the area to combat a fire. Additionally, it has been shown that a fire in the radwaste area will not result in a release in excess of 10CFR100 limits.

10.g

The acceptance test for the remote shutdown modification is written as a series of individual functional tests of the various pumps, valves, fans, and other devices affected by the modification. A typical individual functional test of a device consists of the following steps:

- (a) Placing the control circuit isolation switch in the local position.
- (b) Operating the device using the local control switch.
- (c) Verifying that the local indicating lights function properly.
- (d) Verifying that the control room indicating lights remain off.
- (e) Verifying that operation of the control room switch will not affect the device being tested.
- (f) Returning the isolation switch to the normal position and verifying that control has been restored to the control room.