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June 18, 1979

1-069-12
2-069-8

Director of Nuclear Reactor Regulation
ATTN: Mr. J. F. Stolz, Chief
Light Water Reactors Branch #1
Mr. R. W. Reid, Chief
Operating Reactor Branch #4
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Subject: Arkansas Nuclear One-Units 1 & 2
Docket Nos. 50-368 and 50-313
License Nos. DPR-51 and NPF-6
Fire Protection
(File: 2040, 2-2040)

Gentlemen:

In response to your letter of June 13, 1979, the following is provided.

Item 1.

The Fire Protection Quality Assurance Section (Page 19) indicates that for inspections, tests, and audits related to fire protection, "applicable" portions of the QA Topical, Fire Protection Plan, and Technical Specifications will be applied. This commitment is not clear. The extent that Technical Specifications apply to fire protection is clearly defined in the Technical Specifications. Any portions of the QA Topical or Fire Protection Plan that will not be applied to fire protection inspection, test, or audit activities should be clearly identified and justification provided for not using these. If the intent is to follow the QA Topical, Fire Protection Plan, and Technical Specifications in performing fire protection inspections, tests, and audits, then Applicable portions of" or "applicable sections of" should be deleted from the lead in sentence and sections 2., 3., and 4. of the Fire Protection Quality Assurance Section.

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Response:

During our meeting with the staff on May 23, 1978, Quality Assurance requirements were discussed at length and commitments made to resolve the staffs concerns. These commitments were documented in our letter to the staff dated June 15, 1978, and are incorporated verbatim in Revision 2 of the Fire Protection Plan.

It is important to note that the Fire Protection Plan is not a procedural document but a "Plan". It outlines what items must be accomplished. The Plant Operating Procedures detail the specifics of accomplishing the requirements of the "Plan". Our commitment was and remains to meet the Guidelines of Attachment No. 6 to your "Nuclear Plant Fire Protection Function Responsibilities, Administrative Controls and Quality Assurance" dated June 20, 1977, with the noted exceptions. We have understood that this commitment is acceptable. Therefore, no changes to the Fire Protection Plan are proposed.

Item 2.

The last sentence of paragraph 1.a in the Control of Combustibles Section (page 10) was changed by Revision 2 to incorporate commitments made in the AP&L letter of June 29, 1978 in response to staff item 7d from the meeting of May 24, 1978. However, the change to this sentence does not accurately reflect the commitment in the June 29, 1978 letter. This sentence should be changed to read:

"No combustibles will be stored in fire zones with redundant safe shutdown circuitry and/or equipment; no combustibles will be stored in other safety related zones, unless that zone is protected by a sprinkler system."

Response:

As you noted, Rev. 2 of the Fire Protection Plan did not state "circuitry and/or" equipment. This was an accidental omission and our commitment remains unchanged. Plant operating Procedures were developed in accordance with the original commitment. This item will be corrected in the next revision to the Fire Protection Plan.

Very truly yours,

David C. Trimble

David C. Trimble
Manager, Licensing

DCT/JTE/ew

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