TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401 500C Chestnut Street Tower II

MAR 8 1979

Director of Nuclear Reactor Regulation Attention: Mr. S. A. Varga, Chief

Light Water Reactors Branch No. 4

Division of Project Management

U.S. Nuclear Regulatory Commission Washington, DC 20555

THIS DOCUMENT CONTAINS POOR QUALITY PAGES

Dear Mr. Varga:

In the Matter of the Application of) Docket Nos. 50-327 Tennessee Valley Authority

Enclosed is Revision 3 of TVA's response to the Auxiliary Systems Branch (ASB) fire protection review questions for the Sequoyah Nuclear Plant. This information was requested in your letter to N. B. Hughes dated September 1, 1978. The original information, Revision 1 and Revision 2, was submitted by my letters to you dated November 9, 1978, December 19, 15.3, and January 19, 1979, respectively. This revision includes:

- Revisions to our responses to ASB questions 1, 3, 7, 8, 9, 11, 13, 14, 16, 17, 18, 20, 21, 24, and 27. These revisions answer open items that remained after your preliminary evaluation of our initial responses.
- Various figures to supplement our responses.
- 3. Responses to additional discussion items that were asked after your preliminary evaluation.

Very truly yours,

J. E. Gilleland Assistant Manager of Power

Enclosure (10)

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AUXILIARY SYSTEMS BRANCH FIRE PROTECTION REVIEW SEQUOYAH NUCLEAR PLANT - UNITS 1 AND 2 DOCKET NUMBERS 50-327/328

Your submittal provides only part of the information requested in Enclosure 2 to our letter dated September 30, 1976. A fire hazards analysis should be conducted for each plant fire area, and the effects of postulated fire involving permanent and/or transient combustibles on systems, circuits, or equipment required for safe plant cold shutdown should be evaluated. The fire detection and primary and secondary fire suppression systems for each area should also be indicated. In the fire hazards analysis you should identify all the redundant mechanical and electrical systems necessary for safe cold shutdown which are separated only by distance (no fire barriers). The fire hazards analysis should demonstrate that, assuming failure of the primary suppression system, a fire in installed or transient combustibles will not damage redundant trains or divisions of systems required for safe plant cold shutdown. Where this cannot be demonstrated, an alternate means of assuring safe plant shutdown (cold shutdown) should be provided.

TVA Response

Sequoyah Nuclear Plant's fire protection system design was based on the results of a fire hazards analysis covering those areas where an unmitigated fire could affect a unit's ability to reach and maintain a safe cold shutdown. The analysis involved a detailed review of the plant design and an evaluation of the effects of postulated fires.

The results of the analysis are provided in part in the Sequoyah Nuclear Plant Fire Protection Program Reevaluation forwarded to the NRC by letter from J. E. Gilleland to R. S. Boyd dated January 24, 1977. The following discussion supplements the original documentation.

Based upon the fuel loading and compartmentation of fire cells, fire suppression and detection systems have been provided in the various plant areas as identified in Table 1-1. When fixed suppression systems are provided in an area, they are considered the primary systems. Backup protection is provided by standpipe systems or yard hydrants. When manual systems are used exclusively in an area, they are considered the primary systems and are backed up by manual systems in adjacent areas.

Figure 1.1 is a safe shutdown logic diagram for a fire at Sequoyah Nuclear Plant. This figure and its comment sheet identify those plant features necessary to achieve and maintain a safe plant shutdown in the event of a fire. I/A has conducted an analysis of the plant based upon this diagram and its comment sheet assuming a postulated exposure fire with a zone of influence requiring a minimum 20-foot spatial separation of redundant equipment, circuits, or components in all plant areas outside of containment. This analysis has identified where additional protection

and/or separation is required to assure that the hot shutdown condition is reached during a fire using only existing hardware and no extraordinary operating action (i.e., the operator's response will not be required in less than 15 minutes and will consist of plant manipulations typical of those required for normal operation). The analysis does not consider inside primary containment because transient fire loads in this area, when the plant is at power, are not credible, and fixed hazards which pose an exposure threat to equipment components or circuits required for safe shutdown (i.e., reactor coolant pumps) are provided with fixed automatic water suppression systems, automatic detection capability, and an oil collection pan with drains to prevent spilled oil from contacting hot piping. Note that terms such as inadequate separation and unacceptable interaction when used in this discussion refer to the inability to achieve 20-foot spatial separation within a fire cell. These terms do not imply violation of separation as specified in the plant design criteria.

Throughout this discussion an asterisk (*) will be used to identify the title of a function block on the shutdown logic diagram (Figure 1.1). This diagram and its keyed comments are germane and are an integral part of the following discussion.

Hot Shutdown

Each of the six conditions necessary to achieve hot shutdown are discussed separately. Refer to the six conditions which provide input into the $\underline{\mathsf{AND}}$ block that leads to the hot shutdown condition on the shutdown $\overline{\mathsf{logic}}$ diagram.

Secondary Side Pressure Control - The Secondary Safety Valves* and the Secondary Relief Valves* can satisfy this plant condition. The spring-loaded secondary safety valves used for short-term control are considered immune to fire damage. The secondary relief valves used for long-term control are adequately separated so that access to the required two valves for manual actuation can be assured during a fire. The redundant circuits for the steam generator pressure instrumentation were found to be inadequately separated. TVA will provide the required instrumentation integrity in accordance with Table 1.3. Since this satisfies the required condition, TVA has not evaluated control via the Main Steam System* nor remote electrical control of the power-operated secondary relief valves.

Steam Generator Inventory Control - This plant condition requires an auxiliary feedwater pump capable of feeding any two steam generators, level control for these steam generators, and suction to the pump. This analysis has identified areas where the postulated exposure fire described above would affect both the A and B train sections of the Motor-Driven Auxiliary Feedwater Pump* function. Other areas were identified where a separate postulated exposure fire would affect both trains of the Turbine-Driven Auxiliary Feedwater Pump* function. However, no single postulated fire exists which would affect both of these functions.

Interactions also exist for the automatic control of the Steam Generator Level Control* function. These interactions have been deemed acceptable because the control valves themselves are adequately separated and manual control is achievable. Unacceptable interactions were found to exist for the steam generator level signal which is necessary for both manual or automatic level control. TVA will provide the necessary protection of this function in accordance with Table 1.3. Suction from the ERCW* (essential raw cooling water system) was not evaluated because suction from the Condensate Storage Tank* is assured due to the tank being immune to fire damage.

Reactor Coolant System Inventory Control - This condition requires that RCS letdown be controlled, that RCS makeup be provided, and that reactor coolant nump seal integrity be assured. These three conditions are discussed separately.

RCS Letdown Control - This condition can be satisfied by closure of any one of a number of Letdown Isolation Valves* in each of two series strings of valves. Since all of the valves involved are air-operated valves which would fail in the desired position should their control cable be damaged, these control circuits were not evaluated for separation.

RCS Makeup - This condition requires the availability of a charging pump, pump suction, and a flow path into the RCS. Of these, water, via Volume Control Tank Suction* and Refueling Water Storage Tank Suction*, is assured since the tanks themselves perform only a passive function which would not be jeopardized by a fire, and manual handwheel operation of the RWST suction valves is acceptable.

The analysis noted that the single postulated exposure fire described above could cause the loss of both trains of the CVCS Centrifugal Charging Pump* and the Positive Displacement Charging Pump*. TVA will correct this unacceptable condition by rerouting the wiring for the positive displacement charging pump and the positive displacement pump room cooler in accordance with Table 1.2. This pump was chosen for rerouting because it is the pump used in normal operation; hence, its flow path is already properly aligned. The ECCS charging Flow Path* associated with the centrifugal pumps contains interactions which can affect both A and B train sections. These interactions are acceptable because they do not affect the positive displacement charging pump, hence, either the positive displacement pump via the normal charging path or the centrifugal charging pump(s) via the ECCS path(s) are available during any postulated fire.

Control of RCS makeup via either the ECCS (centrifugal) pumps or the normally operating (positive displacement) pumps requires a pressurizer level signal. Unacceptable interactions were found to exist between conduits associated with the required instrumentation wiring. TVA will correct this condition in accordance with Table 1.3. The component cooling water and

essential raw cooling water systems are identified in the keyed comments as being required for RCS makeup. Unacceptable interactions do exist in both of these systems. The CCS mechanical system interactions and how they are resolved are discussed in the response to question 13. The CCS and ERCW electrical system interactions will be protected in accordance with Table 1.4.

RCP Seal Integrity - Seal integrity for the reactor coolant pumps can be assured if either the positive displacement charging pump or the centrifugal charging pump and the associated Charging Flow Control Valve, FCV62-93*, are available to provide injection water to the seals. The modifications proposed to upgrade the system in the preceding paragraph will assure RCP seal integrity. RCP Thermal Barrier Cooling* also would assure this required condition. This path does contain interactions which would affect both its A and B train sections. These interactions are deemed acceptable because RCP seal injection is assured.

Secondary Side Isolation - The Main Steam Isolation Valves* are storedenergy, fail-closed valves which require both A and B control signals to remain in the open position. A postulated fire which would affect the control cables would cause the valves to shut, assuring this function. Hence, these control cables and those for the parallel path, Steam Load Isolation*, were not evaluated.

Analysis of the Main Feedwater Isolation Valves* indicated that at least one of the two valves in each feedwater line could be shut for the postulated fire. Hence, the Main Feedwater Pump* function, a parallel path to feedwater isolation, was not evaluated.

Each steam generator blowdown line contains an A and B train blowdown Isolation Valve* in series. Both valves would fail in the desired, closed position if there was fire damage to the control cables; hence, this feature is considered to be assured and was not evaluated.

RCS Pressure Control - Trained power cables outside primary containment for the Pressurizer Heaters* were found to interact within 20 feet in two locations. Within the reactor building annulus, the two trains are separated by 19 feet for most of their routing, but approach 13 feet at the primary containment penetration. This interaction has been deemed acceptable because of the low probability for transient fire loads within the annulus area and because all exposed surfaces of cable within this area have been provided with a flame-retardant mastic coating.

The second interaction involves opposite trains approaching to within three feet at an orthoganal crossing on elevation 759 of the auxiliary building near the pressurizer transformers and switchgear. The divisional medium-voltage (6900 volts) power cables for the supply to the 6.9-kV/480V stepdown pressurizer heater transformer are routed in cable trays located above power cables of the redundant division. TVA will provide the required circuit integrity in accordance with Figure 1-2. Automatic sprinkler protection will be provided at the divisional interaction.

Instrumentation conduits which contain the pressure signals necessary for control interact within the auxiliary building. TVA will correct this condition in accordance with table 1.3.

<u>Initial Reactivity Control</u> - The trained Reactor Trip System* which provides this condition is a fail-safe system which will respond to the postulated fire by causing the control rods to be inserted. Thus, no evaluation was considered necessary.

Cold Shutdown

The dashed section of the shutdown logic diagram identifies two additional plant conditions, Long Term Heat Removal and Long Term Reactivity Control, which must be established to place the plant in the cold shutdown condition. This section of the shutdown logic diagram has been analyzed to assure that all required plant conditions can be established within 72 hours of a postulated fire having a zone of influence requiring a minimum 20-foot separation. It should be noted that unlike the hot shutdown analysis, the cold shutdown analysis does take credit for damage control measures which cannot be considered typical of normal plant operation. These extraordinary actions are described below.

Long Term Heat Removal - The condition requires the Residual Heat Removal (RHR) system to be operable. It is realized when an RHR Shutdown Cooling Flow Path* is established and the RHR Pumps* are operational. Manual handwheel operation of all required valves is acceptable with no further evaluation. All other features were found to be adequately separated except the cables which supply the RHR pump room coolers. TVA's resolution of this interaction is described in table 1.5. (Note: Unacceptable interactions do exist within the component cooling water--CCS--system. These interactions and their resolutions have been discussed in the hot shutdown analysis above and also in the response to question 13.)

Long Term Reactivity Control - To establish an acceptable shutdown margin under cold conditions, the contents of the boron injection tank (BIT) must be charged into the reactor coolant system. The Flow Path Through the BIT* can be established by manual handwheel operation of the required valves and was not evaluated further. Analysis of the CVCS Centrifugal Charging Pumps* noted that the pumps, the pump room coolers, and the oil pumps are not adequately separated to withstand the postulated fire. A discussion of TVA's resolution to these interactions is provided in table 1.5.

Conclusion

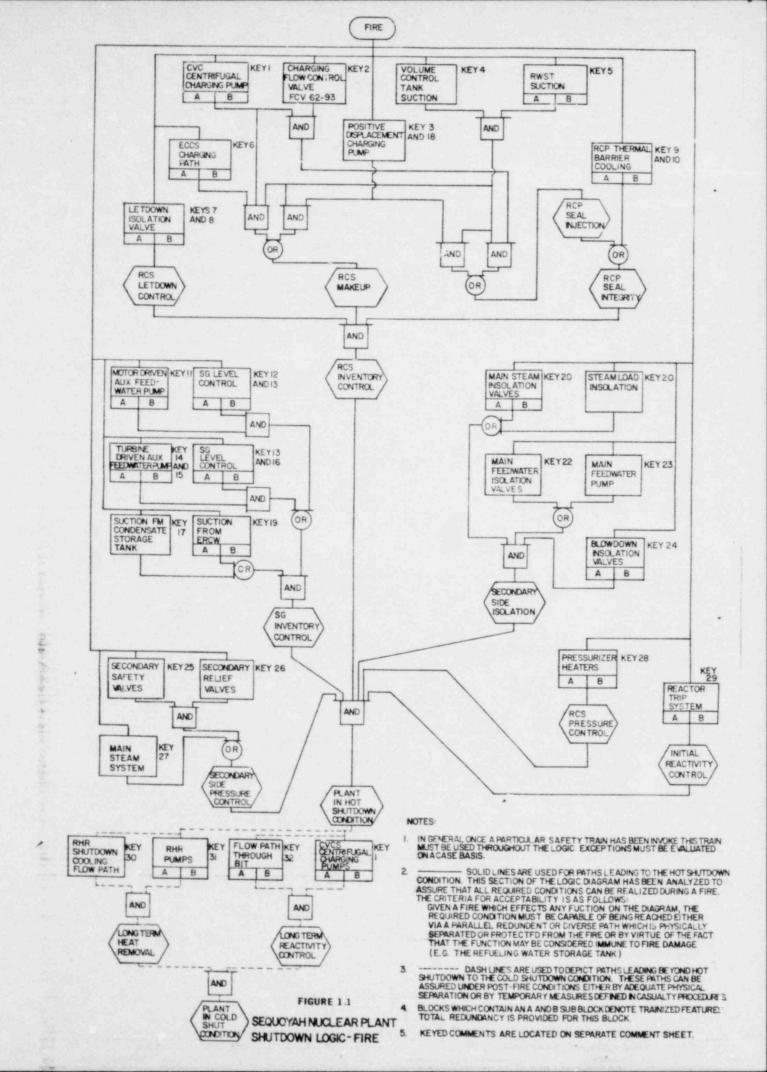
As a result of the preceding analysis and the identification of areas where 20-foot spatial separation of redundant circuits required for safe shutdown within a fire cell has not been achieved, protective measures described in Tables 1.2, 1.3, and 1.4 shall be implemented. These modifications will assure the ability to achieve the hot shutdown condition as discussed previously in this response. The cold shutdown condition can be achieved within 72 hours through the implementation of temporary damage control measures and extraordinary operator actions described in table 1.5.

Strict administrative procedures have been established to control transient combustibles and are included in the Sequoyah Physical Instruction, PHYSI-13. The procedure requires identification of the routes for transient combustibles and the procedure takes no credit

for the fixed suppression system in regard to its extinguishing capability for transient fire loads. The procedure requires provisions for additional fire protection that is capable of suppressing the transient fire load.

With the defense-in-depth as described above, protection to redundant divisions of systems from installed or transient combustibles has been provided to ensure capability of safe shutdown of the plant.

FIGURE 1.1
SEQUOYAH NUCLEAR PLANT
SHUTDOWN LOGIC - FIRE



KEYED COMMENTS

- Requires auxiliary lube oil pump AND power to pump room cooler AND ERCW to pump oil cooler AND ERCW to pump room cooler AND CCS water to ERCW heat exchangers.
- Requires appropriate section of pressurizer level control system AND EITHER B auxiliary air compressor OR station air compressor.
- 3. Requires ERCW to pump room cooler AND power to pump room cooler AND CCS water to pump oil cooler AND CCS water to pump speed control AND ERCW to CCS exchanger AND EITHER automatic speed control from appropriate section of pressurizer level control system OR manual speed control using pressurizer level instrumentation.
- 4. Short-term make up source, normally aligned, no action required.
- 5. Long-term make up source requires opening of FCV62-135 OR FCV62-136, hand wheel operation acceptable.
- 6. Flow path requires opening an inlet valve (EITHER FCV63-25 OR FCV63-26) AND an outlet valve (EITHER FCV63-39 OR FCV63-40) for the boron injection tank.
- Termination of normal letdown requires closure of FCV62-77 OR FCV62-70 OR FCV62-69 OR all three valves FCV62-72, FCV62-73 and FCV62-74.
- 8. Termination of excess letdown requires closure of FCV62-54 OR FCV62-55 OR FCV62-56.
- 9. Requires CCS water to thermal barrier booster pump AND ERCW to CCS heat exchangers.
- 10. IF B train is selected, an additional requirement is opening capability for FCV70-9, FCV70-10, FCV70-195 and FCV70-196.
- 11. Requires automatic control AND hydraulic motor for back pressure regulating valve (A train PCV3-122, B train PCV3-132).
- 12. Requires automatic control signal to level control valves (A train LCV3-156 AND LCV3-164, B train LCV3-148 AND LCV3-171) OR steam generator level instrumentation for manual control (A train steam generator 1 AND 2, B train steam generator 3 AND 4). Manual control consists of on/off operation of the pump.
- 13. IF automatic control is selected, an additional requirement is the appropriate train of auxiliary air compressor OR service air compressor.
- 14. Not a true A and B train system—the turbine-driven auxiliary feedwater subsystem may be considered to be a separate single train, which can be supplied with control and power from either of the traditional A and B trains.

- 15. Requires turbine trip and throttle valves (FCV1-51) AND governor valve (FCV1-52).
- 16. Requires automatic signal to any two level control valves (LCV3-172, LCV3-173, LCV3-174, LCV3-175) OR steam generator level instrumentation for manual control of any two steam generators. Manual operation consists of handwheel operation of the level control valves.
- 17. Normally aligned, no action required.
- 18. IF automatic speed control is selected, an additional requirement is B train auxiliary air compressor OR service air compressor.
- 19. Requires suction valves to open AND ERCW system availability.
- Requires closure of all main steam isolation AND isolation bypass valves (FCV1-4, FCV1-11, FCV1-22, FCV1-29, FCV1-147, FCV1-148, FCV1-149, FCV1-150).
- 21. Requires closure of main steam dump valves AND main turbine trip and throttle valve AND main feedwater pump turbine trip and throttle valves.
- 22. Requires closure of a feedwater isolation valve (FCV3-33, FCV3-47, FCV3-87, FCV3-100) OR closure of a feedwater control and bypass valve pair in each feed line (FCV3-35 AND FCV3-35A, FCV3-48 AND FCV3-48A, FCV3-90 AND FCV3-90A, FCV3-103 AND FCV3-103A).
- 23. Requires trip of main fredwater pump turbine.
- 24. Requires closure of one valve in each blowdown line (FCV1-7 OR FCV1-181) AND (FCV1-14 OR FCV1-182) AND (FCV1-25 OR FCV1-183) AND (FCV1-32 OR FCV1-184).
- 25. Self actuating, short-term control.
- 26. Long-term control, requires operability of any two relief valves (PCV1-5, PCV1-12, PCV1-23, PCV1-30 manual control acceptable) AND pressure instrumentation for same two steam generators.
- 27. Requires opening of two main steam isolation <u>OR</u> isolation bypass valves <u>AND</u> control of main steam dump valves <u>AND</u> condenser circulating water.
- 28. Manual control requires RCS wide range temperature and pressure instrumentation.
- 29. Requires reactor shutdown by driving in control rods OR manual scram signal OR manual opening of scram breakers OR de-energizing of rod drive motor generator.
- 30. Requires opening FCV74-1 AND FCV74-2. Handwheel operation is acceptable.

- 31. Requires RHR pump operability (temporary cables are acceptable) AND CCS water to RHR heat exchanger (handwheel operation of A train valve FCV70-156 or B train valve FCV70-153 is acceptable) AND CCS water to RHR pump seal cooler AND RHR pump room cooling (portable blower is acceptable).
- 32. Flow path requires opening an inlet valve (EITHER FCV63-25 OR FCV63-26) AND an outlet valve (EITHER FCV63-39 OR FCV63-40) for the boron injection tank. Handwheel operation is acceptable.

TABLE 1-1

The following table summarizes the fire protection systems provided in the Sequoyah Nuclear Plant. The table covers only those areas where an unmitigated fire could affect a unit's ability to reach and maintain a safe cold shutdown condition.

- Notes: (1) Refer to the SK-1000 series of compartmentation drawings for location of the tabulated areas.
 - (2) The compartmentation fire rating column identifies the rating of the most limiting component in the compartmentation boundary. Refer to the response to question 3 for additional compartmentation information.
 - (3) Refer to the response to question 12 for a discussion of the fire retardant coating of exposed cable trays.
 - (4) Legend:
 - I Ionization smoke detector
 - IR Infrared flame detector
 - LT Linear thermistor
 - PE Photoelectric smoke detector
 - RC Rate compensated thermal detector
 - T Fixed temperature thermal detector

		L	OCATION				FIXED	FIRE P	ROTECTIO	V		
BUILDING	ELEV.	ROOM NO.	ROOM NAME	COMPARTMENT FIRE RATING	FIRE RETARDANT COATING OF EXPOSED CABLES	PREACTION SPRINKLER SYSTEM	OPEN NOZZLE SPRAY SYSTEM	CARBON DIOXIDE SYSTEM	STANDP IPE SYSTEM	PORTABLE EXTINGUISHERS E	YARD HYDRANTS	TYPE OF FIRE DETECTORS
CONTROL	669.	C1	MECHANICAL EQUIPMENT	1-1/2 HR.		X			X	Х		T DC
		CZ	MECHANICAL EQUIPMENT	1-1/2 HR.	15.10	X		-				I, RC
		C3	250V BATTERY RM NO. 1			^			X	×		I, RC
		C4	250V BATTERY BOARD RM NO. 1	1-1/2 HR.		X			Х	Х		I. RC
		C5	250V BATTERY BOARD RM NO. 2	1-1/2 HR.					X	X		1
		C6	250V BATTERY RM NO. 2	1-1/2 HR. 1-1/2 HR.					X	X		1
		C7	24V & 48V BATTERY RM	1-1/2 HR.		X			Х	X		I, RC
		CB	24V & 48V BAT. BD. & CHARGER	1-1/2 HR.		Х			X	X		I, RC
	1. 1	C9	COMMUNICATIONS RM	1-1/2 HR	La effect of	x			Ŷ	, X		
		CIK	MECHANICAL EQUIPMENT	1-1/2 HR.					Ŷ	, A		
		CIT	CORRIDOR SECONDARY ALARM STATION	1-1/2 HR. 1-1/2 HR.		X .		-	X	X		I, RC I
	685.	C1 C2	STAIR STAIR UNIT 1 AUX. INSTRUMENT RM	1-1/2 HR. 1-1/2 HR. 1-1/2 HR.	x				X	X		
		ca	CORRIDOR	1-1/2 HR.		. 1		X	X	X		I, RC
		C3	COMPUTER RM	1-1/2 HR.	×			X	, A	X		
		C4	UNIT 2 AUX. INSTRUMENT RM	1-1/2 HR.	X			Ŷ	, A	, x		I, RC
		CI	STAIR .	1-1/2 HR.				1 °	· ^	\ \ \ \ \ \ \		I, RC
		ca	STAIR	1-1/2 HR.					Y	1 %	1000	
	706.0	CI	CHART STORAGE	1-1/2 HR. *		X		×	Y	Ŷ	100	
		ca	SPREADING RM	1-1/2 HR. *	Х	x		X	Y	Ŷ		5 C 7 C
		CI	STAIR	1-1/2 HR.				, "	x	Ŷ		*
		CZ	STAIR	1-1/2 HR.					x	x		
5414		1										

*3-hour separation maintained between fire area containing chart storage and spreading room and other plant areas.

		L	OCATION					FIRE P	ROTECTIO	N N		
BUILDING	ELEV.	ROOM NO.	ROOM NAME	COMPARTMENT FIRE. RATING	FIRE RETARDANT COATING OF EXPOSED CABLES	PREACTION SPRINKLER SYSTEM	OPEN NOZZLE	CARBON DIOXIDE SYSTEM	STANDP I PE SYSTEM	PORTABLE EXTINGUISHERS	YARD HYDRANTS	TYPE OF FIRE DETECTORS
CONTROL	732.0	C16	CORRIDOR P.S.O. LNGR. SHOP STAIR STAIR	1-1/2 HR. 1-1/2 HR. 1-1/2 HR. 1-1/2 HR.		X			X X X X	X X X	N H	I I, RC
5418				The state of				200				

		LOCATION				FIXED	FIKE F	ROTECTIO	N		
BUILDING ELE	V. ROO NO	M ROOM NAME	COMPARTMENT FIRE. RATING	FIRE RETARDANT COATING OF EXPOSED CABLES	PREACTION SPRINKLER SYSTEM	OPEN NOZZLE SPRAY SYSTEM	CARBON DIOXIDE SYSTEM	STANDPIPE SYSTEM	PORTABLE EXTINGUISHERS OF	YARD HYDRANTS	TYPE OF FIRE DETECTORS
AUXILIARY 551.	A2 A3 A4 A4 A5 A6 A7 A8 A9 A10 A11 A12 A13 A16	CORRIDOR HOLDUP TANK ROOM A HOLDUP TANK ROOM B FLOOR DRAIN COLL PUMP & FILTER ROOM A FLOOR DRAIN COLL TANK ROOM GAS STRIPPER FEED PUMP SUMP PUMP ROOM SUMP TANK ROOM CONTAINMENT SPRAY 1B-B CONTAINMENT SPRAY PUMP 1A-A RHR PUMP ROOM 1B-B RHR PUMP ROOM 1A-A RHR PUMP ROOM 2A-A RHR PUMP ROOM 2B-B CONTAINMENT SPRAY PUMP 2A-A CONTAINMENT SPRAY PUMP 2B-B PIPE GALLERY	1-1/2 HR. 1-1/2 HR. 1-1/2 HR. 1-1/2 HR. 1-1/2 HR. 1-1/2 HR. 1-1/2 HR. 1-1/2 HR. 1-1/2 HR.					X X X X X X X X X X X X X X	X X X X X X X X X X X X		1
669,0	1	PIPE GALLERY CORRIDOR VALVE GALLERY GAS DECAY ROOM	1-1/2 HR.	х	X X			X X X	X X X		I I I

		L	OCATION				FTOPK	FIRE P	ROTECTIO			
BUILDING	ELEV.	ROOM NO.	ROOM NAME	COMPARTMENT FIRE RATING	FIRE RETARDANT COATING OF EXPOSED CABLES	PREACTION SPRINKLER SYSTEM	UPEN NOZZLE	CARBON DIOXIDE SYSTEM	SYSTEM	PORTABLE EXTINGUISHERS	YARD HYDRANTS	TYPE OF FIRE DETECTORS
AUXILIARY	669.0	A4	CHEMICAL DRAIN TANK ROOM		Fee	X			,	1		
		A5				^	14.5		,	X		
		A6	AUX FEEDWATER PUMP 1A-A	1-1/2 HR.		¥			, .	X		
		A7	PIPE GALLERY	1-1/2 HR.	let the seal	X .			Ŷ	1 ^		
		A8	PIPE GALLERY & CHASE						Y	Ŷ		
		A9	CHARGING PUMP 1A-A	1-1/2 HR.		Х			X	X		
		A10	CHARGING PUMP 1B-B	1-1/2 HR.	Photos in	Х			X	l x		
		All	CHARGING PUMP 1C-C	1-1/2 HR.		X		1	X	X		
		A12	SAFETY INJECTION PUMP 18-8	1-1/2 HR.		X			X	X		
			SAFETY INJECTION PUMP 1A-A	1-1/2 HR.		X			X	X		,
			CASK DECONTN. COLL. TANK ROOM			Х		A T	X	1 x		
		A15	SPENT RESIN TANK ROOM			X			X	X		1
		A16	VALVE GALLERY			X			X	X		
		A17	WASTE EVAP PACKAGE			X			X	X-		
		A18	AUX WASTE EVAP PACKAGE			X			X	X		
			SAFETY INJECTION PUMP 2A-A	1-1/2 HR.		X			X	X	1	I
			SAFETY INJECTION PUMP 28-8	1-1/2 HR.		X	1		X	X		1
		A21	CHARGING PUMP 2C-C	1-1/2 HR.		χ		For the	X	X		1
			CHARGING PUMP 28-B	1-1/2 HR.		Х			X	X		1
		- 1	CHARGING PUMP 2A-A	1-1/2 HR.		X	77		X	X	1	1
			PIPE GALLERY & CHASE						X	X	1	1
			PIPE GALLERY	1-1/2 HR.		X	100		X	X	11.51	I
			AUX. FEEDWATER PUMP 2A-A	1-1/2 HR.		Χ			X	X		1
35406		A27	CONCENTRATE FILTER						X	X	1	Ι
	1											

	_	OCATION				FIXED	TINE P	ROTECTIO	IN .		
BUILDING ELEV.		ROOM NAME	COMPARTMENT FIRE RATING	FIRE RETARDANT COATING OF EXPOSED CABLES	PREACTION SPRINKLER SYSTEM	OPEN NOZZLE SPRAY SYSTEM	CARBON DIOXIDE SYSTEM	STANDPIPE SYSTEM	PORTABLE EXTINGUISHERS	YARD HYDRANTS	TYPE OF FIRE DETECTORS
	A2 A3 A4 A5 A6 A7 A8 A9 A10 A11 A12 A13 A14 A15 A16 A17 A18 A19 A20 A21	TITRATION ROOM RADIO CHEM LAB. COUNTING ROOM PIPE GALLERY VOL CONTROL TANK ROOM REACTOR BLDG. ACCESS ROOM VALVE GALLERY SEAL WATER HEAT EXCHANGER 1A HEAT EXCHANGERS 1B HEAT EXCHANGERS 1A SAMPLE ROOM 11 SAMPLE ROOM 11 HEAT EXCHANGERS 2A HEAT EXCHANGERS 2B SEAL WATER HEAT EXCHANGER 2A VALVE GALLERY PIPE GALLERY PIPE GALLERY VOL CONTROL TANK ROOM REACTOR BLDG. ACCESS RM. *IN CHARCOAL FILTERS **LOCATED IN CHARCOAL FILTER ***LOCATED IN CHARCOAL FILTER	DUCIS.		X X X X X X X X X X X X X X X X X X X	Х*		X X X X X X X X X X X X X X X X X X X	X X X X X X X X X X X X X X X X X X X	> I	I I I I**, [T*** I I I

		L	OCATION				FIXED	FIRE P	ROTECTIO	N MANUAL		
BUILDING	ELEV.	ROOM NO.	ROOM NAME	COMPARTMENT FIRE RATING	FIRE RETARDANT COATING OF EXPOSED CABLES	PREACTION SPRINKLER SYSTEM	OPEN NOZZLE SPRAY SYSTEM	CARBON DIOXIDE SYSTEM	STANDPIPE SYSTEM	PORTABLE EXTINGUISHERS	YARD HYDRANTS	TYPE OF FIRE DETECTORS
AUXILIARY	690.0	A22	VALVE GALLERY		-			-	X	X		
		A23 A23a A24	CVCS VALVE GALLERY				16		X	X		
		A25	WASTE GAS COMP B	1.00	Service Co.				×	Ŷ		
		A26	WASTE GAS COMP A		12.17.43				X	Y		
		A27	DECONTAMINATION ROOM		10 U-114	X			X	Y		1.00
		A28	PIPE CHASE	1-1/2 HR.	10 100 100				X	Y Y		1
		A29	PIPE CHASE	1-1/2 HR.	Barrellow 1			1	X	l x		
		A30	AIR LOCK						X	X		
			WASTE GAS ANALYZER ROOM						X	X		
	706.0		The state of the s			14 5.4			X	X		
		A2	MAIN STEAM VALVE ROOM					111	X	Y		
		A3	WASTE PACKAGE AREA	1-1/2 HR.		Х			x	Y		
		A4	WASTE PACKAGE AREA			X			Y.	l v		
		A5	CASK LOADING AREA	1-1/2 HR.		X		Late 1	Y	X		,
		A6	N2 STORAGE AREA	1-1/2 HR.	place of			1000	X	x		1
	705.0	A7	CASK DECON ROOM					Fe 113	X	X		
	706.0	A8	FUEL TRANSFER VALVE ROOM			Χ.		130.37	X	x -		,
	1 1	A9	FUEL TRANSFER VALVE ROOM			X			X	X		
		Ald	MAIN STEAM VALVE ROOM	100000				la de la constante	X	l x		1
			MAIN STEAM VALVE ROOM						×	l x		
			STEAM VALVE INST. ROOM A					100	X	X		
		All	STEAM VALVE INST. ROOM B	Part Sty B					X	X		
		A14	UHI EQUIP	1-1/2 HR.	Х			13.3	l v	1		
504		ATS	UHI EQUIP	1-1/2 HR.	Y				1	1 ^		

		L	OCATION .				FIXED	FIRE P	ROTECTIO	N MANUAL		
BUILDING	ELEV.	ROOM NO.	ROOM NAME	COMPARTMENT FIRE RATING	FIRE RETARDANT COATING OF EXPOSED CABLES	PREACTION SPRINKLER SYSTEM	OPEN NO77LE SPRAY SYLTEM	CARBON DIOXIDE SYSTEM	STANDPIPE SYSTEM	POPTABLE EXTINGUISHERS	YARD HYDRANTS	TYPE OF FIRE DETECTORS
AUXILIARY	714.0		COMMON AREA	1-1/2 HR.	Х	X			X	X		-1
			HOT INSTRUMENT SHOP	1-1/2 HR.		X		1.41.	X	X		
			HGT. & VENT ROOM AIR LOCK	1-1/2 HR.	X	Х			X	X		
		3	VENT. & PURGE AIR ROOM	1-1/2 HR.	X		V.		^	1 .		
			AIR LOCK	1-1/2 114.		X	Х*		l î	X		
			LETDOWN HEAT EXCHANGER					007.0	Î	1 x		
			LETDOWN HEAT EXCHANGER						Y Y	X		I**, LT***
			VENT. & PURGE AIR ROOM	1-1/2 HR.	X	x	х*	1.113	l x	X		1
			AIR LOCK			17 11	^		X	X	-	
			AIR LOCK						X	X		
		A12	HTG. & VENT ROOM	1-1/2 HR.		Х			X	1 x	13.53	
		A13	AIR LOCK						X	X		
		A14	AIR LOCK						X	X		
		A15	FUEL DETECTOR ROOM			Х			X	X		I
		A16	FUEL DETECTOR ROOM			X			X	X		1
												E. Carlot
			*IN CHARCOAL FILTERS **LUCATED IN CHARCOAL FILTE ***LOCATED IN CHARCOAL FILTE	DUCTS AND GEN	EFAL AREA.					The second Property of		
102				Land Control				-				

		L	OCATION				FIUER	FIRE P	ROTECTIO	N		
	1						FIXED		-	MANUAL		
BUILDING	ELEV.	ROOM NO.	ROOM NAME	COMPARTMENT FIRE RATING	FIRE RETARDANT COATING OF EXPOSED CABLES	PREACTION SPRINKLER SYSTEM	OPEN NOZZLE SPRAY SYSTEM	CARBON DIOXIDE SYSTEM	SYSTEM	PORTABLE EXTINGUISHERS	YARD HYDRANTS	TYPE OF FIRE DETECTORS
UXILIARY	734.0	Al	AUXILIARY CONTROL ROOM	1-1/2 HR.	Х	X			Y	X		
		A2	6.9 KV SHUTDOWN BD. ROOM A	1-1/2 HR.	X	X			Ŷ	Ŷ		
		A3	125V VITAL BATT. BD. RM II	1-1/2 HR.	X	X****	100		Y	Ŷ		
		A4	125V VITAL BATT, BD, RM I	1-1/2 HR.	X	X****			X	l x		1
		A5	480V SHUTDOWN BD. ROOM 182	1-1/2 HR.	X	Х			X	X		
		A6	480V SHUTDOWN BD. ROOM 1B1	1-1/2 HR.	X	X	133	1.6	X	X		
			480V SHUTDOWN BD. ROOM TAI	1-1/2 HR.	X	X			X	χ .	HL	ı
			The state of the s	1-1/2 HR.	X	X			X	X		
		A9	PERSONNEL & EQUIP ACCESS	1-1/2 HR.	X	X	no ser	MEN	X	X		
			STEAM GEN. BLOWDOWN	1-1/2 HR.	X	X			X	X		1
			REACTOR BLDG. EQUIP HATCH	3 HR.		X			Χ.	X		1
			REACTOR BLDG. ACCESS RM.	1-1/2 HR.	. х	X		1000	X	X		1
			REFUELING ROOM	1-1/2 HR.			5 -0		X	X		1
			REACTOR BLDG. ACCESS RM.	1-1/2 HR.	X	X			X	X		1
			REACTOR BLDG. EQUIP. HATCH	3 HR.	20.000	X			X	X		1
			EMERGENCY GAS TREATMENT FILTE	1-1/2 HR.	X	Χ	χ*	100	X	X		I**, LT***
			PERSONNEL & EQUIP. ACCESS	1-1/2 HR.	Х	Χ		10.11	X	X		1
			480V SHUTDOWN BD. ROOM 2B2	1-1/2 HR.	X	X	1 3 4		X	X		1
			480V SHUTDOWN BD. ROOM 2B1	1-1/2 HR.	Х	X			Х	X		1
			480V SHUTDOWN BD. ROOM 2A1	1-1/2 HR.	Х	X			X	X		1
		A21	480V SHUTDOWN BD. ROOM 2A2	1-1/2 HR.	Х	X			X	X		I
			*IN FILTER **LOCATED IN FILTER DUCTS AN ***LOCATED IN FILTER UNIT ****MANUAL ACTUATION	D GENERAL AREA								

		L	OCATION				FIXED	FIRE P	ROTECTIO			
BUILDING	ELEV.	ROOM NO.	ROOM NAME	COMPARTMENT FIRE RATING	FIRE RETARDANT COATING OF EXPOSED CABLES	PREACTION SPRINKLER SYSTEM	OPEN NOZZLE SPRAY SYSTEM	CARBON DIOXIDE SYSTEM	SYSTEM	PORTABLE EXTINGUISHERS	YARD HYDRANTS	TYPE OF FIRE DETECTORS
UXILIARY	734.0	A22	125V VITAL BATT BD. ROOM IV	1-1/2 HR.	X	χ*			v	1		
		A23	125V VITAL BATT BD. ROOM III	1-1/2 HR.	×	х*			^	1 .		
		A24		1-1/2 HR.	X	X	0.14		Ŷ	1 .		
		A25	AUX CONTROL INST. RM 1A	1-1/2 HR.	X	X	-11		Ŷ	1 0		
		A26	AUX CONTROL INST. RM 18	1-1/2 HR.	X	X	4.77		x	Î		
		A27	AUX CONTROL INST. RM 2A.	1-1/2 HR.	X	X	41.5		Y	l v		
		A28	AUX. CONTROL INST. RM 2B	1-1/2 HR.	X	X			Y	Î		
	740.5	Al	UHI EQUIP. ROOM				1121	100	Y	l î		
		A2	ICE BIN EQUIP. ROOM		1000000		M: 4 1	120	Y	Î		
	749.0	A1	480V BOARD RM. 1A	1-1/2 HR.	x	x	1450		Y	1 ^		
		A2	480V BOARD RM. 1B	1-1/2 HR.	x 1	X			Y	Ŷ		
		A3	125V VITAL BATT. RM II	1-1/2 HR.		χ*			Y	Y		,
		A4	125V VITAL BATT. RM. I	1-1/2 HR.		7/*			Ŷ	1 ^		
		A6	480V TRANSFORMER RM 1B	1-1/2 HR.	X	х			Y	Î	1	, , , , , , , , , , , , , , , , , , ,
		A7	480V TRANSFORMER RM 1A	1-1/2 HR.	x	X	12. 14		Y	1		
		A8	MECH. EQUIPMENT RM.	1-1/2 HR.	X	Х			X	Y		
		ASA	HEPA FILTER PLENUM RM.	1-1/2 HR.	The state of	Х			X	Y		
		A9	MECH. EQUIPMENT ROOM	1-1/2 HR.	X	X			X	l x		,
		A9A	HEPA FILTER PLENUM RM.	1-1/2 HR.	X	X	1.00		X	1		1
		ATO	480V TRANSFORMER RM. 2B	1-1/2 HR.	Х	X			X	X		,
		ATT	480V TRANSFORME? RM. 2A	1-1/2 HR.	X	X	4.0		X	X		
		A13	125V VITAL BATT. RM. IV	1-1/2 HR.	0.00000	Х*			X	X		1
		A14	125V VITAL BATT. RM. III	1-1/2 HR.		х*			X	X		
01383			480V BOARD RM. 2B	1-1/2 HR.	X	X			X	X		I

Т		
	TYPE OF FIRE DETECTORS	R C R L L L L L L L L L L L L L L L L L
	QAAY ZTMARQYH	
MATICAL	PORTABLE EXTINGUISHERS	××××××
CTION		****
FIRE PP	CARBON DIOXIDE SYSTEM	
FIXED	OPEN NOZZLE SPRAY SYSTEM	
	PREACTION SPRIUKLER SYSTEM	****
	FIRE RETARDANT COATING OF EXPOSED CABLES	××××
	COMPARTMENT FIRE, RATING	1-1/2 HR. 1-1/2 HR. 1-1/2 HR. 1-1/2 HR. 3 HR.
LOCATION	ROOM NAME	480V BOARD RM. 2A CONTROL ROD DRIVE EQUIP. RM. PRESSURE HTR. TRANSF. ROOM 1 CONTROL ROD DRIVE EQUIP RM PRESSURE HTR. TRANSF ROOM 2 FAN ROOM* ROOF ACCESS AIR LOCK *EXTENSION OF RM. 734.0-A13
77	ROOM NO.	
	ROOM ELEV. NO.	749.0 A16 759.0 A1 A2 A3.0 A1 A2
	BUILDING	AUXILIARY

		L	OCATION				FIXED	FIRE P	ROTECTIO			
BUILDING	ELEV.	ROOM NO.	ROOM NAME	COMPARTMENT FIRE RATING	FIRE RETARDANT COATING OF EXPOSED CABLES	PREACTION SPRINKLER SYSTEM	OPEN NOZZLE SPRAY SYSTEM	CARBON DIOXIDE SYSTEM	SYSTEM	PORTABLE EXTINGUISHERS	YARD HYDRANTS	TYPE OF FIRE DETECTORS
REACTOR			ANNULUS PRIMARY CONTAINMENT EQUIPMENT WITHIN PRIMARY CONTAINMENT REQUIRING FIRE PROTECTION AND/OR DETECTION LOWER COMPARTMENT COOLER A-A LOWER COMPARTMENT COOLER B-B LOWER COMPARTMENT COOLER C-A LOWER COMPARTMENT COOLER UNIT A UPPER COMPARTMENT COOLER UNIT A UPPER COMPARTMENT COOLER UNIT B UPPER COMPARTMENT COOLER UNIT C UPPER COMPARTMENT COOLER UNIT C UPPER COMPARTMENT COOLER UNIT C UPPER COMPARTMENT COOLER UNIT D REACTOR COOLANT PUMP NO. 1 REACTOR COOLANT PUMP NO. 2 REACTOR COOLANT PUMP NO. 3 REACTOR COOLANT PUMP NO. 4 CABLE TRAYS		THE ADEA WITH	** X X X X X			X X X X X	X X X X		PE PE PE PE PE PE PE RC, IR RC, IR RC, IR
35417			*THE REACTOR BUILDING IS RATED *PREACTION SPRINKLER SYSTEM PR	AS A 3-HOUR I	IRE AREA, WITH	NO INTER	NAL FIRE	CELLS CO	NSIDERE			

LOCATION				FIRS PROTECTION FIXED MANUAL							
BUILDING	ELEV. ROOM	ROOM NAME	COMPARTMENT FIRE RATING	FIRE RETARDANT COATING OF EXPOSED CABLES	PREACTION SPRINKLER SYSTEM	OPEN NOZZLE SPRAY SYSTEM	CAPSON DIOXIDE SYSTEM	STANDPIPE SYSTEM	PORTABLE EXTINGUISHERS	YARD HYDRAWTS	TYPE OF FIRE DETECTORS
ADDITIONAL QUIPMENT	706.5 740.5 752.23 A1 753.0 A1 763.5 A1	STORAGE EQUIPMENT WITHIN THIS FLOOR ELEVATION REQUIRING FIRE PROTECTION AND/OR DETECTION PUMPS CHILLER PACKAGES CABLE INSULATION ICE MACHINE EQUIP. RM ELEVATOR MACHINE RM PACKAGE CHILLER EQUIP.	* * * * * * * *	AS A 3-HOUR FIR				X X X X X	X X X X X		

LOCATION			OCATION		FIRE PROTECTION FIXED MANUAL							
BUILDING	ELEV.	ROOM NO.	ROOM NAME	COMPARTMENT FIRE RATING	FIRE RETARDANT COATING OF EXPOSED CABLES	PREACTION SPRINKLER SYSTEM	OPEN NOZZLE SPRAY SYSTEM	CARBON DIOXIDE SYSTEM	SYSTEM	PORTABLE EXTINGUISHERS	YARD HYDRANTS	TYPE OF FIRE DETECTORS
DIESEL GEN.	740.5	2 3 4 5 6 7 8 9 D1 1 2 3 4 5 6	CO2 STORAGE RM. LUBE OIL STORAGE RM. TOILET UNIT 1A-A UNIT 2A-A UNIT 2B-B FUEL OIL TRANSFER RM. PIPE GALLERY & CORRIDOR STAIR CORRIDOR RADIATION SHELTER RM. AIR EXHAUST RM. 480V BOARD RM. 1A AIR INTAKE RM. AIR EXHAUST RM. *LOCATED IN ELECTRICAL PANELS ** THREE-HOUR FIRE R REDUNDANT DIESEL.	1-1/2 HR. 3 HR. ** ** 1-1/2 HR. 1-1/2 HR. 3 HR. 3 HR. 1-1/2 HR. ** ** ** ** ATED CONSTRUCT ENERATOR UNITS	ON HAS BEEN MA	X	BETWEEN	X X X X	X X X X X X X X X X	X X X X X X X X X X		RC, I* RC, I* RC, I* RC, I* RC, I* RC T I, RC T
85420												

		L	OCATION				FIXED					
BUILDING	ELEV.	ROOM NO.	ROOM NAME	COMPARTMENT FIRE RATING	FIRE RETARDANT COATING OF EXPOSED CABLES	PREACTION SPRINKLER SYSTEM	OPEN NOZZLE SPRAY SYSTEM	CARBON DIOXIDE SYSTEM	SYSTEM	PORTABLE EXTINGUISHERS	YARD HYDRAMTS	TYPE OF FIRE DETECTORS
DIESEL GEN.	740.5	7 8 9 10 11 12 13 14 D1	480V BOARD RM. 2A AIR INTAKE RM. AIR EXHAUST RM. 480V BOARD RM. 1B AIR INTAKE RM. AIR EXHAUST RM. 430V BOARD RM. 2B AIR INTAKE RM. STAIR **THREE-HOUR FIRE BETWEEN REDUNDA	** ** ** ** ** ** 3 HR.	TION HAS BEEN M	AINTAINE		X X	x x x x x x x	X X X X X X X X X X X X X X X X X X X		I, RC T I, RC I T I, RC T
35419												

: --

		ı	OCATION				FIXED	FIRE P	ROTACTIO	MAGUERI		
BUILDING	ELEV.	ROOM NO.	ROOM NAME	COMPARTMENT FIRE RATING	FIRE RETARDANT COATING OF EXPOSED CABLES	PREACTION SPRINKLER SYSTEM	OPEN MOZZLE SPRAY SYSTEM	CARBON DIOXIDE SYSTEM	SYSTEM	PORTGALE EXTINGUISHERS	YARD HYDRANTS	TYPE OF FIRE DETECTORS
ERCW PUMPING STATION	625.0 688.0 704.0		ENTIRE ELEVATION MECHANICAL EQUIP. RM 1A MECHANICAL EQUIP. RM 8 ELEC. EQUIP. RM 1A ELEC. EQUIP. RM 2A ELEC. EQUIP. RM 8 ENTIRE ELEVATION *3-HOUR FIRE RATED CONSTRUCT:	3 HR. * * * * * * * * * * * * *	NTAINED BETWEE	N REDUNDA			X X X X X X	x x x x x		I I RC**
85415			**DETECTORS WITH HEAT COLLECTO	AS PROVIDED AB	VE EACH EXCW P	ump.						

	TYPE OF FIRE DETECTORS	I RC**	
	G9AY STIIAAGYH		
MARIDAL	PORTABLE EXTINGUISHERS	××××	
FIRE PROTECTION	SYSTEM M3T2Y2	××××	
FIRE PI	CARBON DIOXIDE SYSTEM		
FIXED	OPEN NOZZLE SPRAY SYSTEM		
	PREACTION SPRINKLER SYSTEM		a'
	FIRE RETARDANT COATING OF EXPOSED CABLES		FUMP TRAINS.
	COMPARTMENT FIRE, RATING		DED FOR ERCW P
LOCATION	ROOM NAME	ENTIRE ELEVATION ENTIRE ELEVATION ENTIRE ELEVATION ENTIRE ELEVATION	*3-HOUR COMPARTMENTATION PROVIDED FOR ERCW FUMP TRAINS. *DETECTORS WITH HEAT COLLECTORS PROVIDED ABOVE EACH ERCW PUMP.
L	ROOM NO.		
	ELEV.	558.0	
	BUILDING	INTAKE PUMPING STATION	85416

LOCATION					FIXED FIRE PROTECTION MANUTAL							
BUILDING	ELEV.	ROOM NO.	ROOM NAME	COMPARTMENT FIRE RATING	FIRE RETARDANT COATING OF EXPOSED CABLES	PREACTION SPRINKLER SYSTEM	OPEN NOZZLE SPRAY SYSTEM	CARBON DIOXIDE SYSTEM	SYSTEM	PORTABLE EXTINGUISHERS TO	YARD HYDRANTS	TYPE OF FIRE DETECTORS
URBINE	585.0 590.0 706.0		ENTIRE FLOOR No. 7 HEATER DRAIN PUMPS No. 3 HEATER DRAIN PUMPS CONDENSATE BOOSTER PUMPS HOTWELL PUMPS CABLE INSULATION ENTIRE FLOOR CABLE INSULATION ELEVATOR MACHINERY ROOM PURIFICATION ROOM DIRTY LUBE OIL TRANSFER PUMP STATION AIR COMP. ENTIRE FLOOR FEEDWATER PUMP TURBINE ENTIRE FLOOR CABLE INSULATION LUBE OIL DISPENSING ROOM MAIN TURBINE LUBE OIL TANKS TURBINE LUBE OIL COOLERS ELECTRO-HYDRAULIC CONTROL PUMPS MAIN OIL PUMPS AND PIPING				X X	X	X X X X X X X X X X X X X X X X X X X	X X X X X X X X X X X X X X X X X X X		RC R

	1	1	OCATION		FIXED FIRE PROTECTION MANUEL								
BUILDING	ELEV.	ROOM NO.	ROOM NAME	COMPARTMENT FIRE RATING	FIRE RETARDANT COATING OF EXPOSED CABLES	PREACTION SPRINKI.ER SYSTEM	OPEN NOZZLE SPRAY SYSTEM	CARBON DIOXIDE SYSTEM	SYSTEM	PORTABLE EXTINGUISHERS	YARD HYDRANTS	TYPE OF FIRE DETECTORS	
URBINE	732.0		ENTIRE FLOOR TURBINE HEAD ENDS HYDROGEN SEAL OIL UNITS AUXILIARY BOILER				X X X**		X X X	X X X		RC RC RC RC	
		- 1	*THE TURBINE BUILDING IS ONE ROOM. **CLOSED HEAD SPRAY SYSTEM OVE	1	- 1	E CELLS.	EXCEPT	'HE LUBE	OIL DISP	ENSING RO	OM AND T	E PURIFICATION	
				AUXILIARI BU	CER.								
411													

TABLE 1.2
CIRCUITS TO BE RELOCATED

Cable or Conduit No.	Function	Resolution
1PL474?B 1PL4743B	CCS Pump 1B-B Supply	Relocate conduit to provide minimum 20' separation from train A
2PL4742B 2PL4743B	CCS Pump 2B-B Supply	Relocate conduit to provide minimum 20' separation from train A
1PL4746B 2PL4748B	CCS Pump 1B-B Control CCS Pump 2B-B Control	Route in conduit from 480V S/D Brds. pumps with 20' minimum separation from redundant train A circuits
1PL5025	Reciprocal Charging Pump Supply	Route in conduit from 480V S/D Brd. to pump with 20' minimum separation from train A
1PL5026	Reciprocal Charging Pump Control	Route in Conduit from 480V S/D Brd. to pump with 20' minimum separation from train A
1PL3021 1PL3023	Reciprocal Charging Pump Room Cooler	Route in conduit from 480V vent Brd to Room Cooler with 20' minimum separation from train A

TABLE 1.3

CIRCUITS TO BE PROTECTED BY A 1/2 HOUR FIRE RATED BARRIER

The following conduits shall be wrapped in a 1-inch-thick B&W Kao wool Blanket in the auxiliary building, from the reactor building containment penetrations at auxiliary building EL 734.0 to the control building Q-line wall penetrations at auxiliary building EL 714.0. These conduits are protected by an automatic sprinkler system.

Function

Conduit No. 1PM1001I 1PM1002II 1PM1003III 1PM1004IV 1PM10681 1PM850II 1PM1066III 1PM1065111 1PM2142111 1PM1067I 1PM2128I 1PM211111 1PM85111 1PM2145IV 1PM2080I 1PM2084I 1PM2132I 1PM2136I 1PM208711 1PM2091II 1PM2104II 1PM212111 1PM2118II 1PM2107II 1PM2094III 1PM2098III 1PM2100IV

Pressurizer level and pressure indication, loops 2 and 3 steam generator instrumentation

1PM2103IV 1PM2124IV

TABLE 1.4

CIRCUITS TO BE PROTECTED BY 1-1/2 HOUR FIRE RATED BARRIERS

The following conduits shall be enclosed by 1-1/2 hour fire rated barriers utilizing a UL-approved configuration from the junction box at UA1, auxiliary building EL 690.0 to UA6, auxiliary building EL 734.0, or to the point where the conduits transition to cable trays where 20-foot minimum separation between trains is achieved. These enclosures are protected by automatic sprinkler systems.

Conduit No.	Function
1PP780A 1PP785B 2PP780A 2PP785B 1PP712B 1PP700B 2PP700B 2PP712B 1PP675A 1PP687A	6900V Power Feed to ERCW 480V XFMR 1A-A 6900V Power Feed to ERCW 480V XFMR 1B-B 6900V Power Feed to ERCW 480V XFMR 2A-A 6900V Power Feed to ERCW 480V XFMR 2B-B ERCW Pump N-B Supply ERCW Pump C-B Supply ERCW Pump M-B Supply ERCW Pump F-B Supply ERCW Pump A-A Supply ERCW Pump A-A Supply
2PP675A 2PP687A	ERCW K-A Supply ERCW H-A Supply

TABLE 1.5

INTERACTIONS IDENTIFIED FOR COLD SHUTDOWN

Interaction Location	Redundant Functions Lost	Cable Numbers	Fix Required in the Event of Fire Causing Loss of Redundancy
Col. S,A3 El. 669.0	Power to both cent. chg pump room coolers	1PL3011B 1PL3003A	Install new cables from power distribution panel to motor or provide portable blower for room cooling
	Automatic and local control to both cent. chg pump rm coolers	1PL3013B 1PL3003B	
	Control valves for ERCW to cent chg pump room coolers	1PL3014B 1PL3004B	
	Power to both RHR pump room coolers	1PL3041B 1PL3031A	
	Automatic and local control to both RHR pump room coolers	1PL3043B 1PL3033B	
	Power to both cent. chg. pump oil pumps	1PL6152B 1PL6145A	Install new cables from power distribution panel to motor
	Power to both cent. chg. pumps	1PP562B 1PP550A	
Col U,A7 El. 669.0	Power to both RHR pump room coolers	1PL3041B 1PL3031A	Install new cable from power distribution panel to motor or provide portable blower for room cooling
	Automatic and local control to both RHR pump room coolers	1PL3043B 1PL3033A	

TABLE 1.5 (Cont'd)

Interaction Location	Redundant Functions Lost	Cable Numbers	Fix Required in the Event of Fire Causing Loss of Redundancy
Col. Q-S, A3-A8 El. 714.0	Automatic and local control to both cent chg pump room coolers	1PL3013B 1PL3003A	Install new cable from power distribution panel to motor or provide portable blower for room cooling
	Automatic and local control for both RHR pump room air coolers	1PL3043B 1PL3033A	
	Power to both cent chg pump oil pumps	1PL6152B 1PL6145A	Install new cable from power distribution panel to motor
Col. Q-T, A3-A4 E1. 734.0	Power to both cent chg pump oil pumps	1PL6152B 1PL6145A	

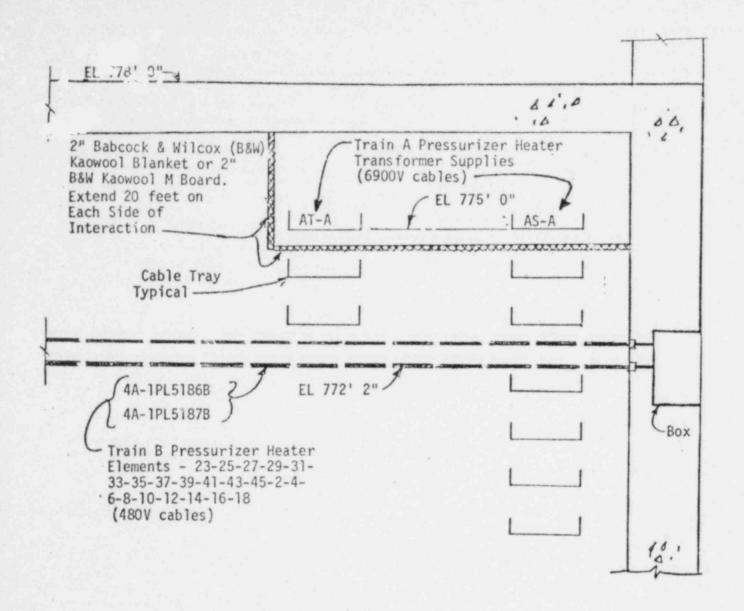
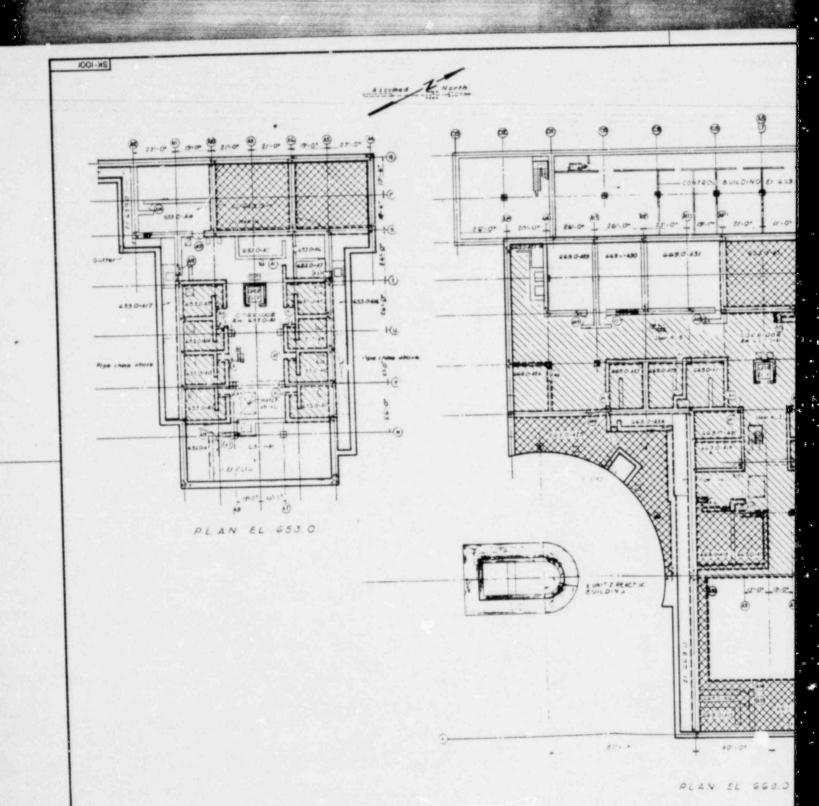
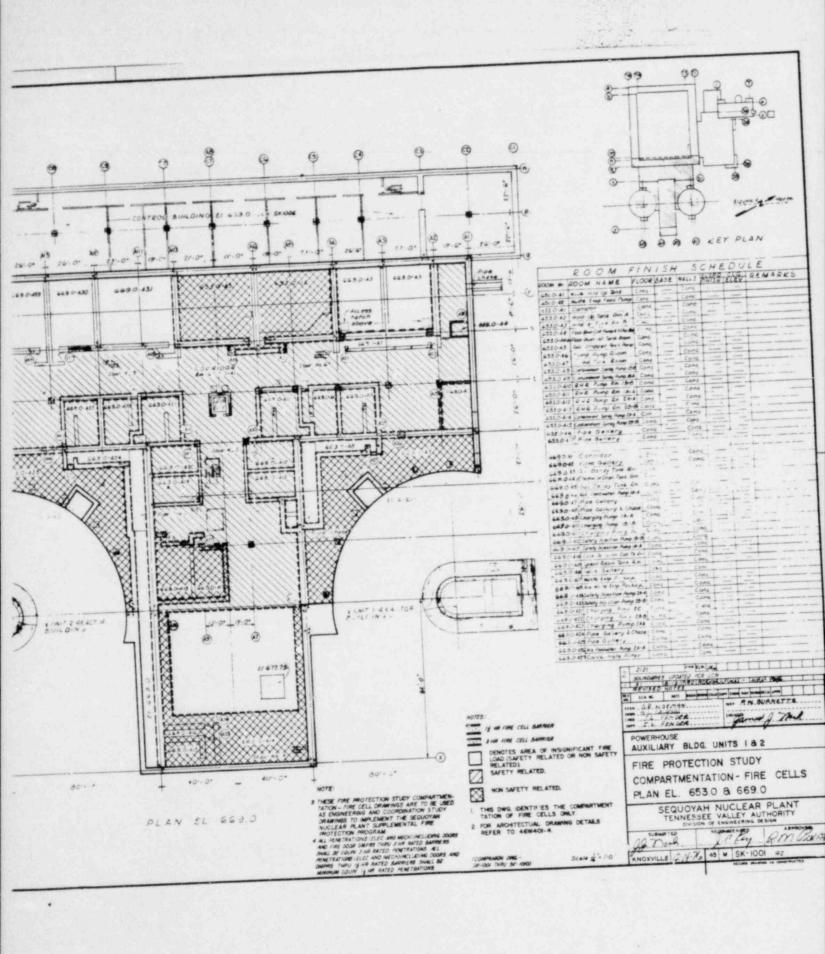
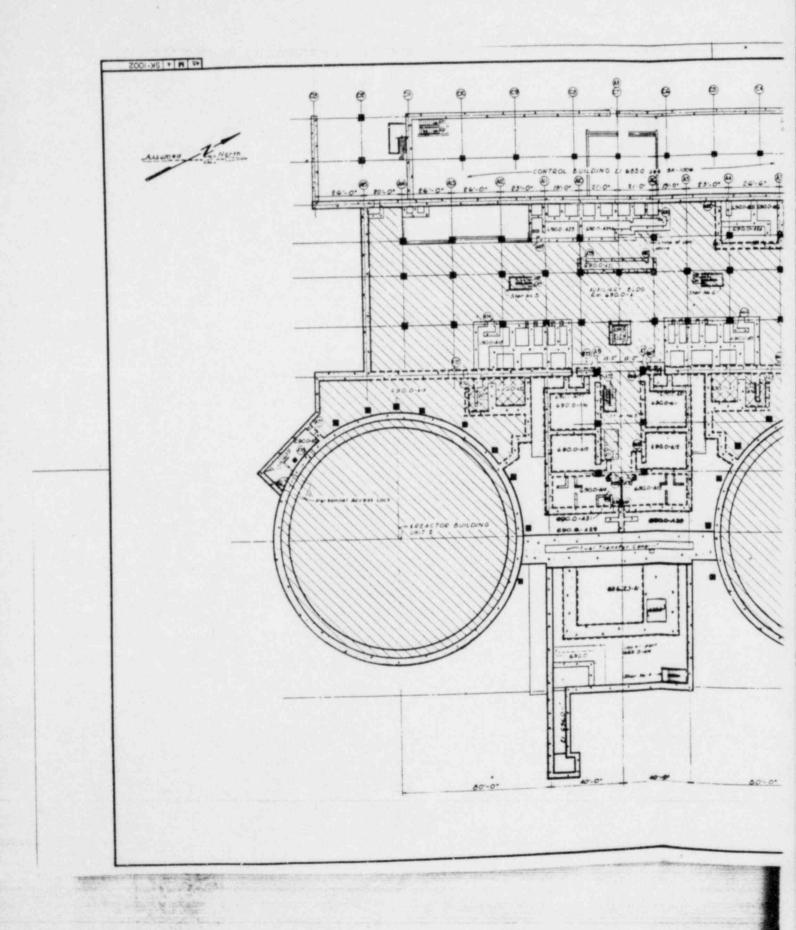
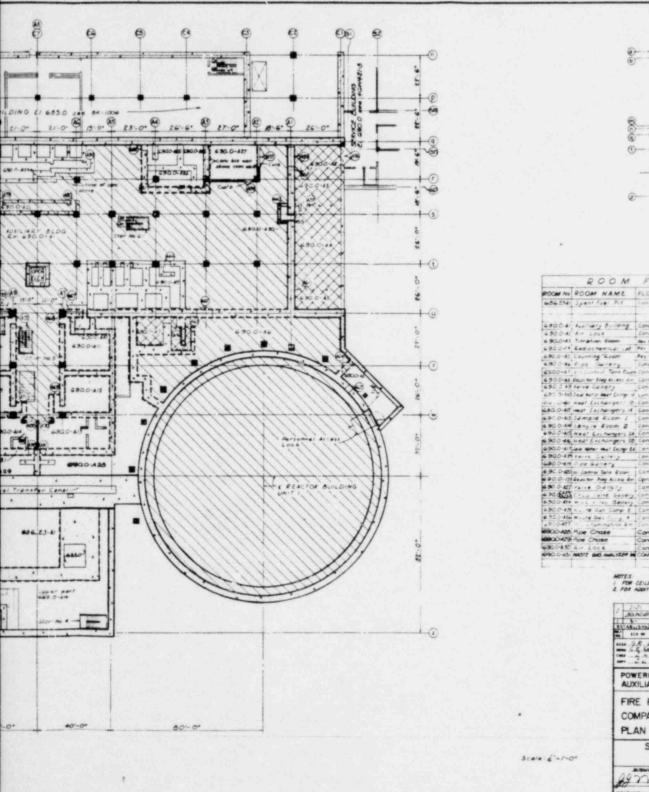


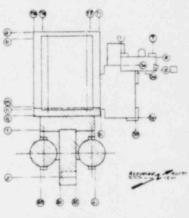
Figure 1-2 (Floor Elevation 759.0)











	ROOM	18	NIS	57		-	ULE
	ROOM NAME	FLOOR	BASE	MINLLS	FINISH	2750	REMARKS
656.234	Spent Fuel Pil	Cont.		Canc			
690041	Auxiliary Duriding	Conc	-	COME		-	
4300 A	Air Lock	Conc	-	Zunc	Minneson.		
6 90,0-41	Tirration Room	Jes. Ne	nay ne	Canc	if pies	499-0	46.8×50-5
690000	Radice memical .at	Res - Int	Folgo 1989	Conc	I Plat	199-0	+64457-5
680.0-AL	Counting Team	Ars Tik	Kenyt frie	Cana	LI PHIL	685	#6#45E-5
6.90 2:46	Pipe Garlery	CUMIC	-	Conc			
6500-41	Killimsted Tank them	Cong	-	Con	-	more desired	
6920-48	Reactor Blag Actes Ac-	Carro	-	CORC			
690 2 49	taine Gallery	conc	-	Carl			
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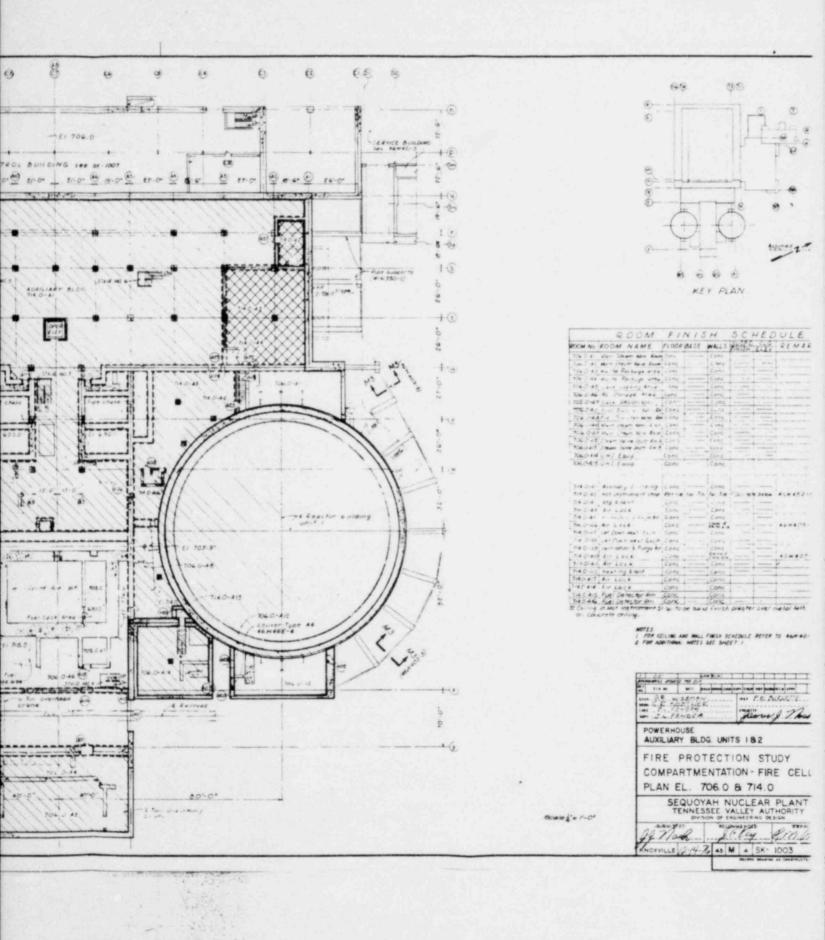
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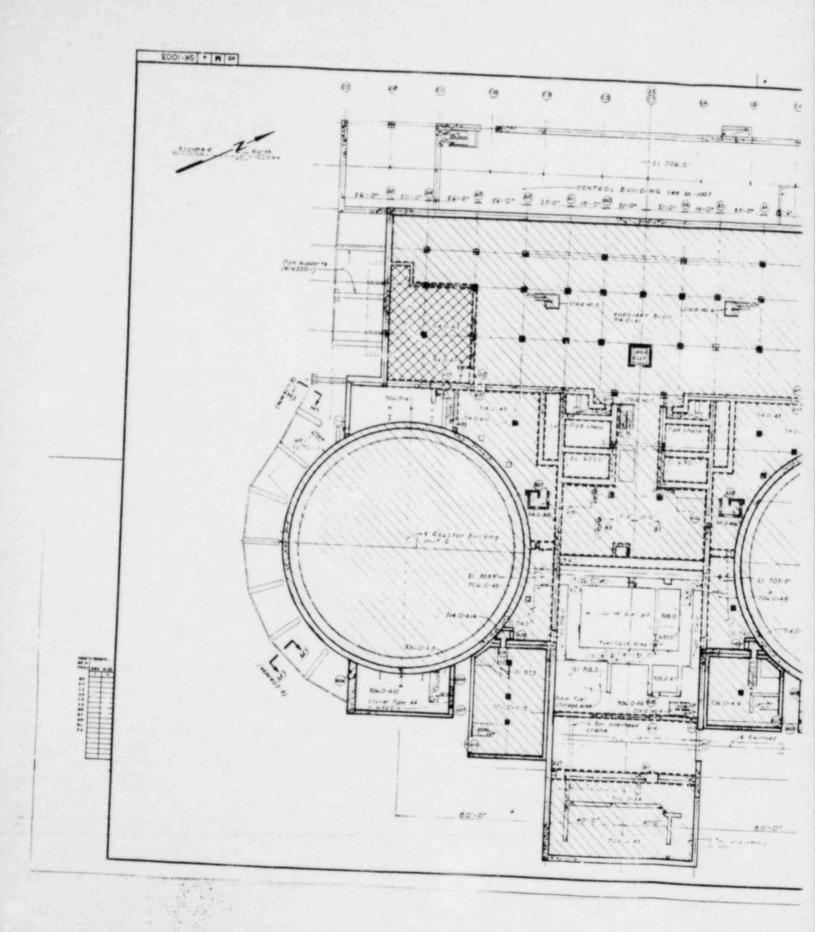
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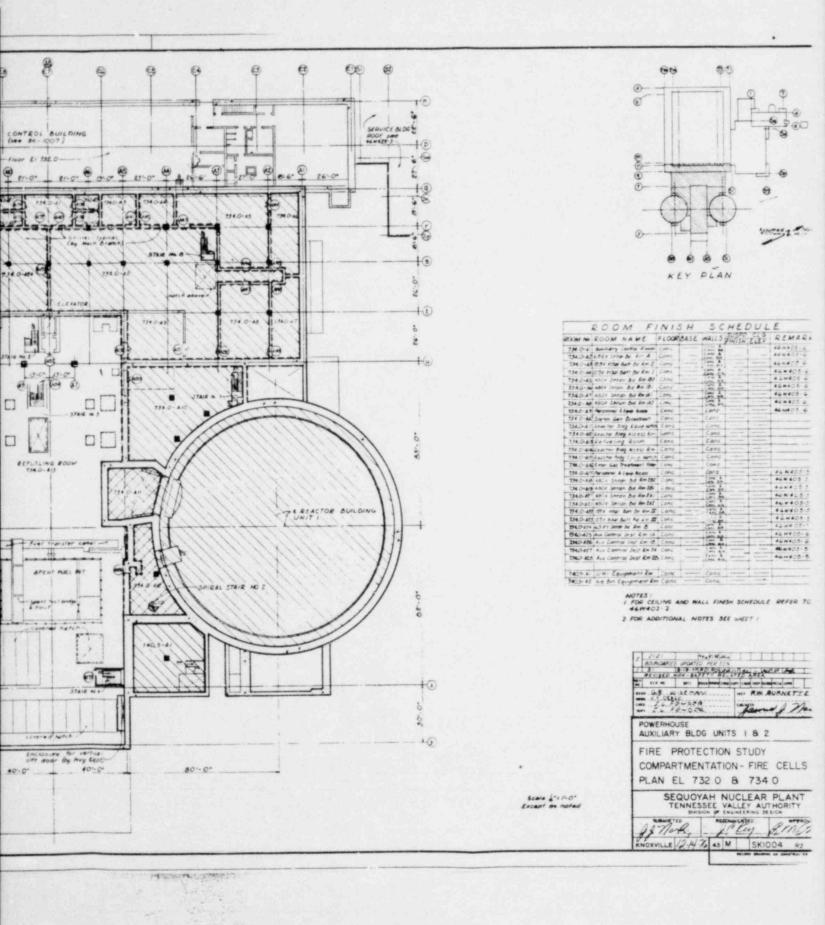
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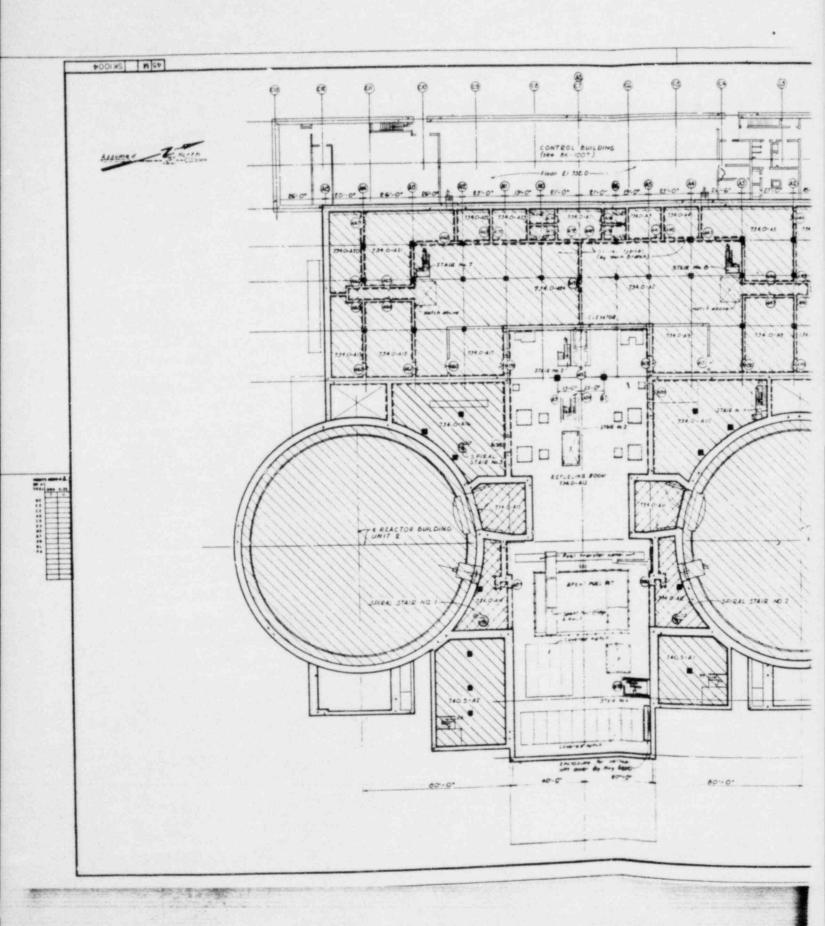
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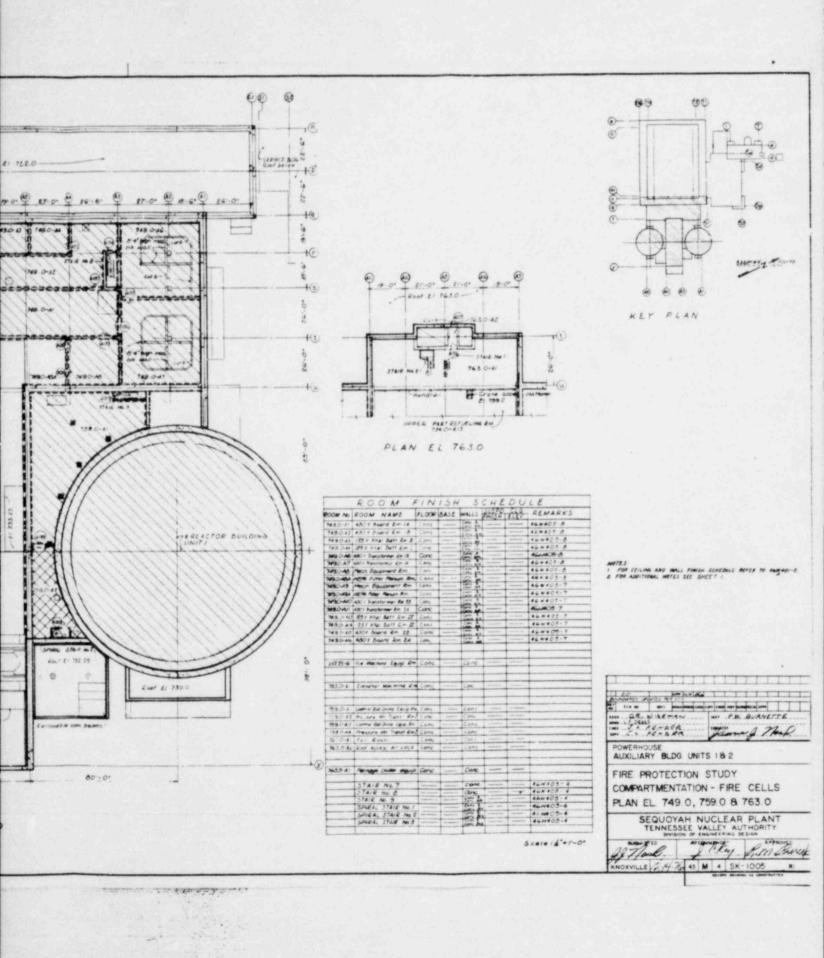
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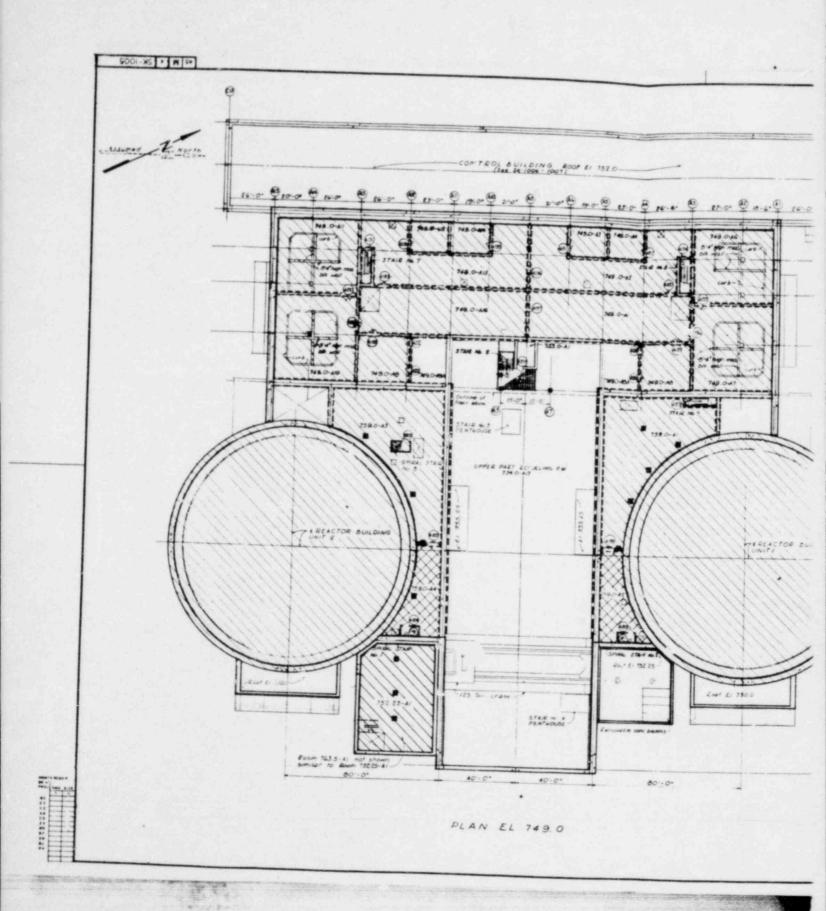


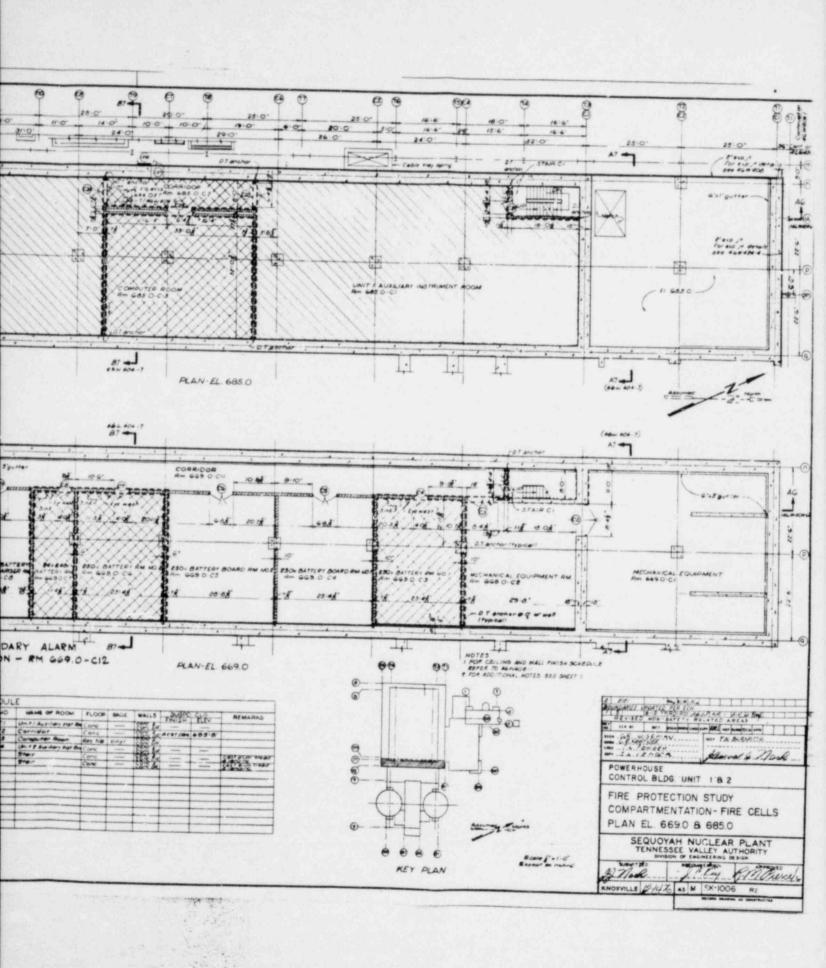


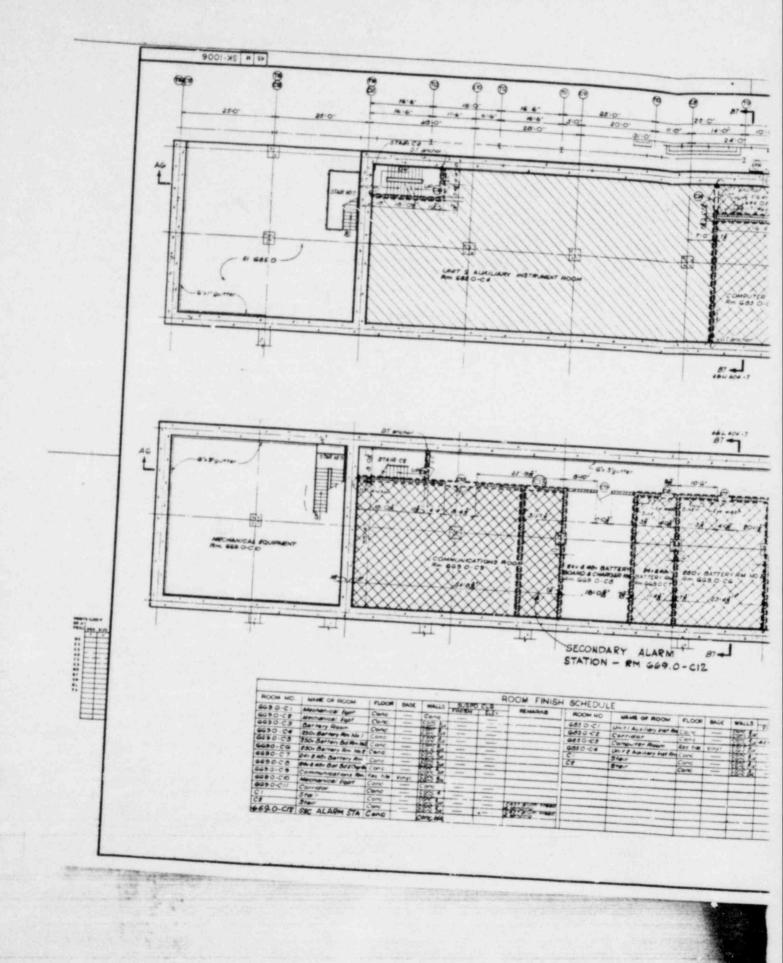


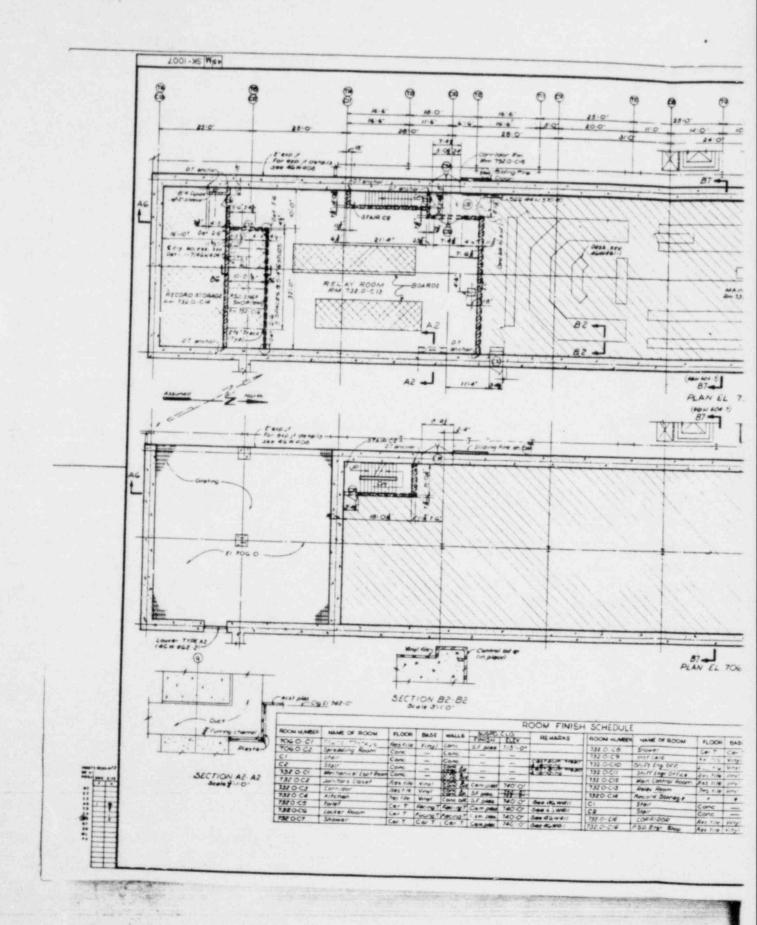


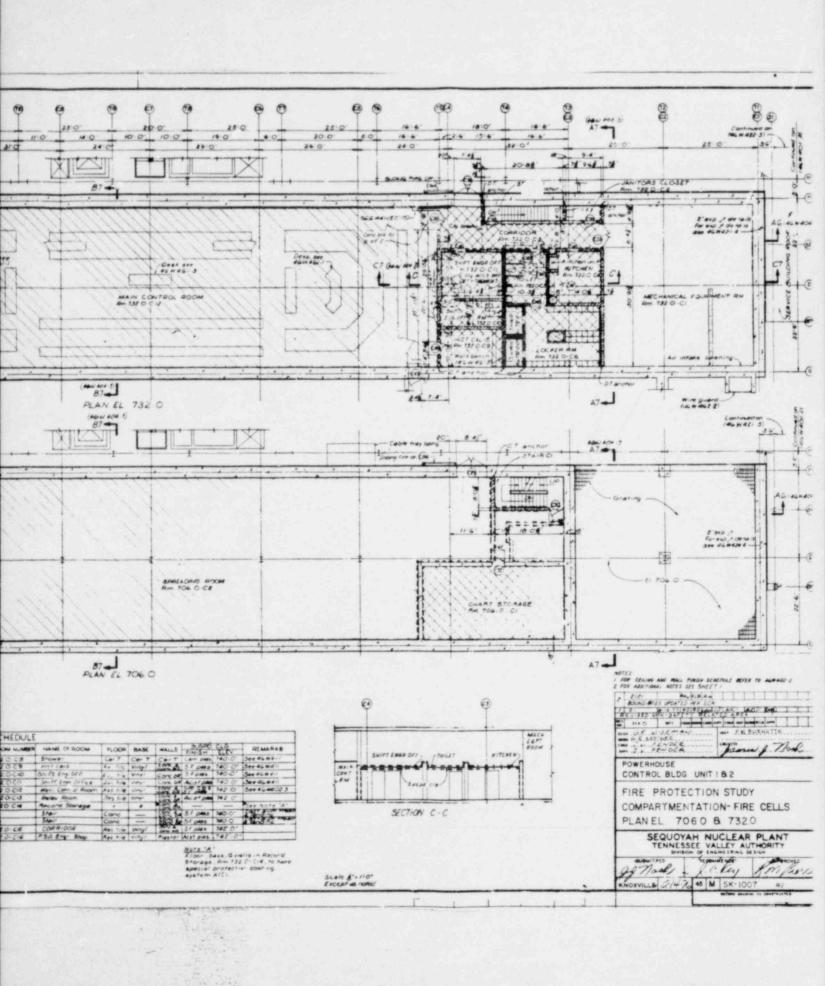


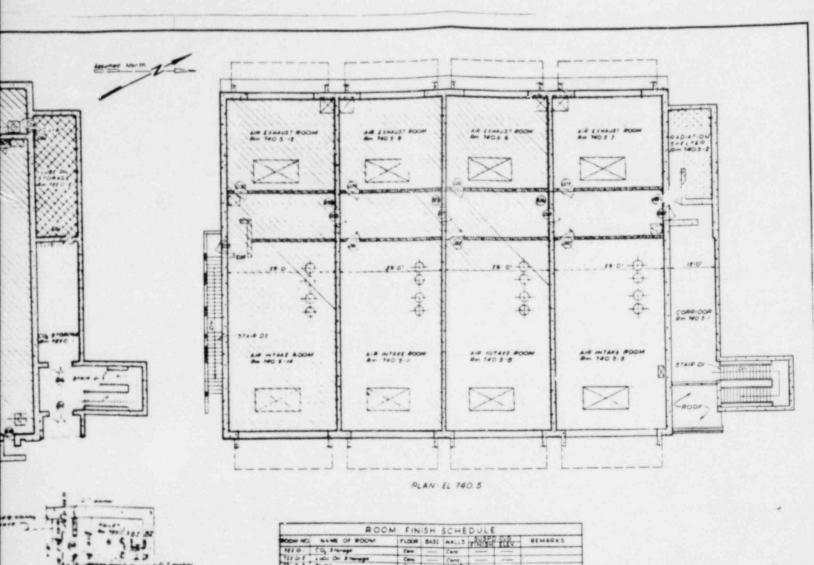


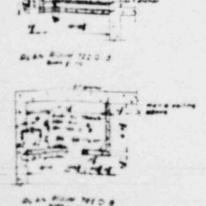












BOOM NO. NAME OF BOOM	FLOOR	BASE	MALLS	SUSP FINISH	ELEV	REMARKS
1810 CQ Immage	Conc		Core		A.S.	
THE P LIES ON Brange	Canc	Table 1	Cone	Second Co.		
75.03 200	Care	-	CON DR	See See	-	
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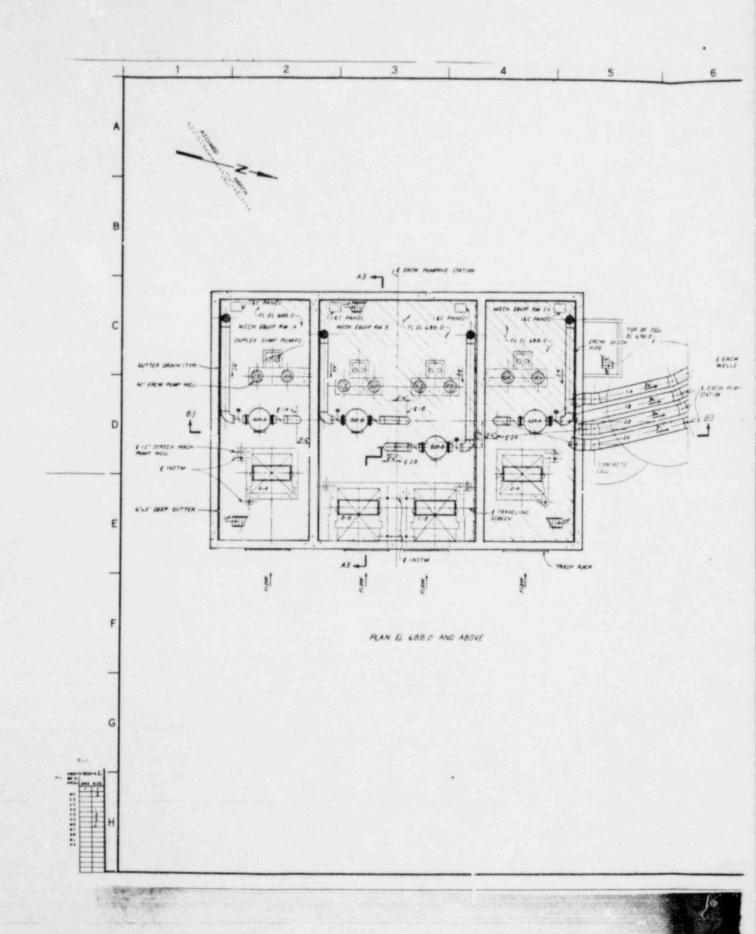
POWERHOUSE DIESEL GENERATOR BUILDING

FIRE PROTECTION STUDY
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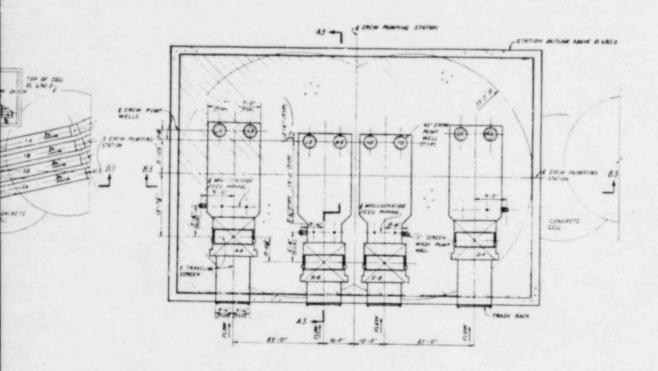
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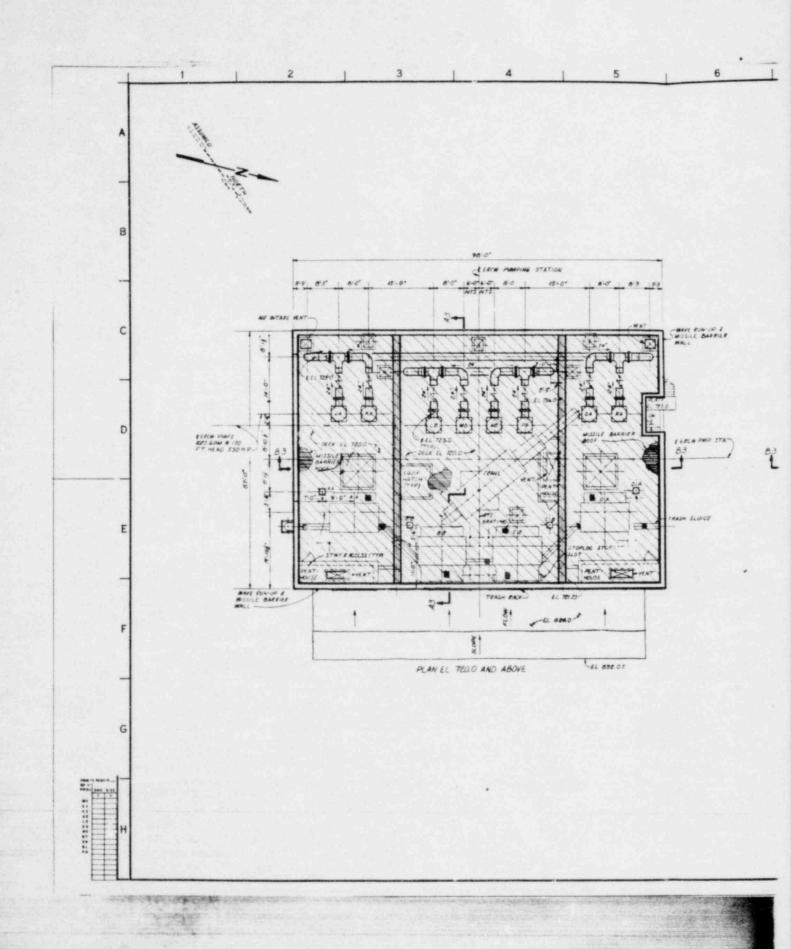


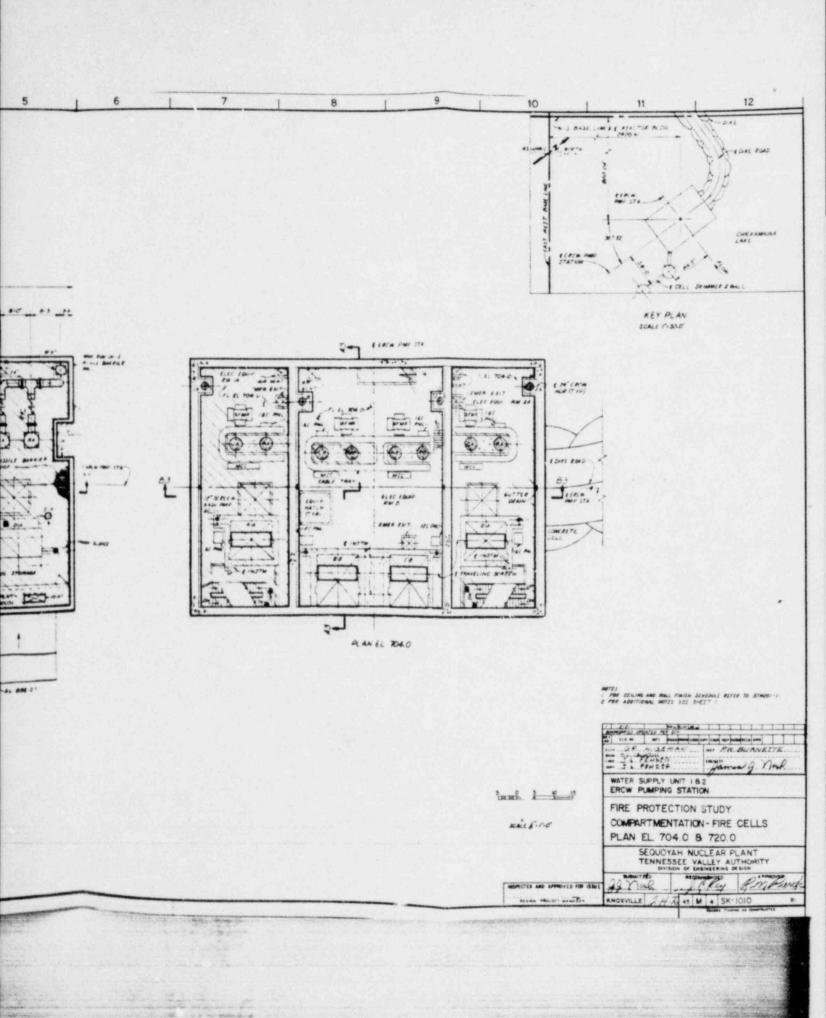
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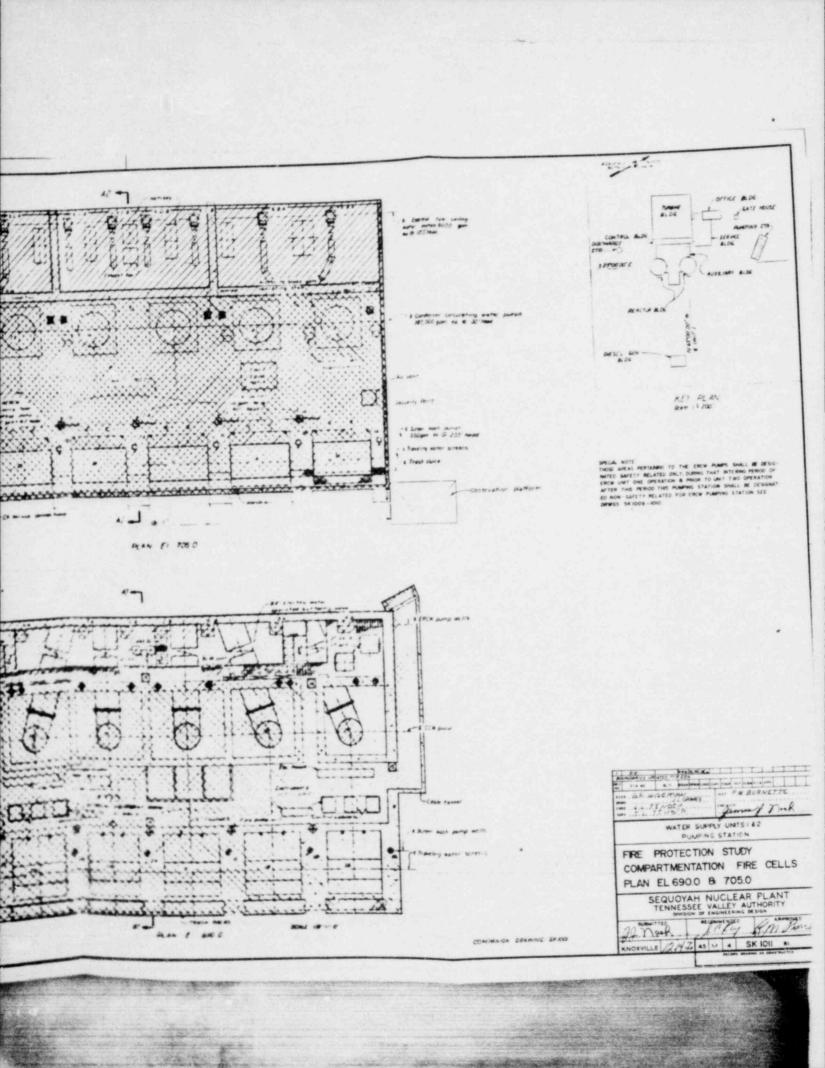


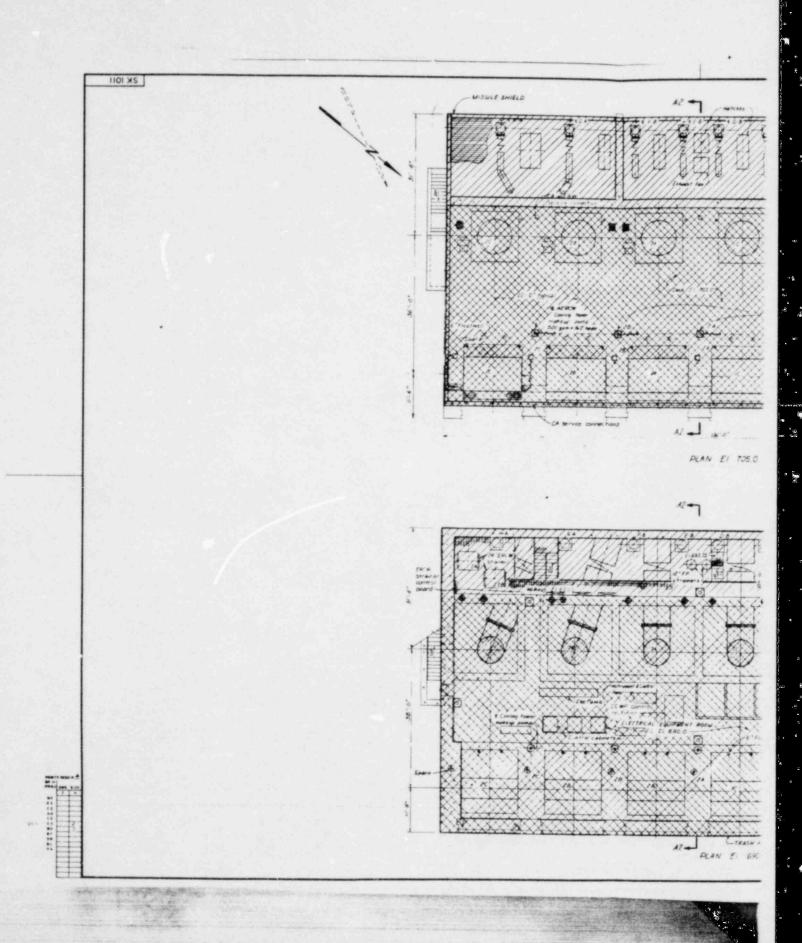
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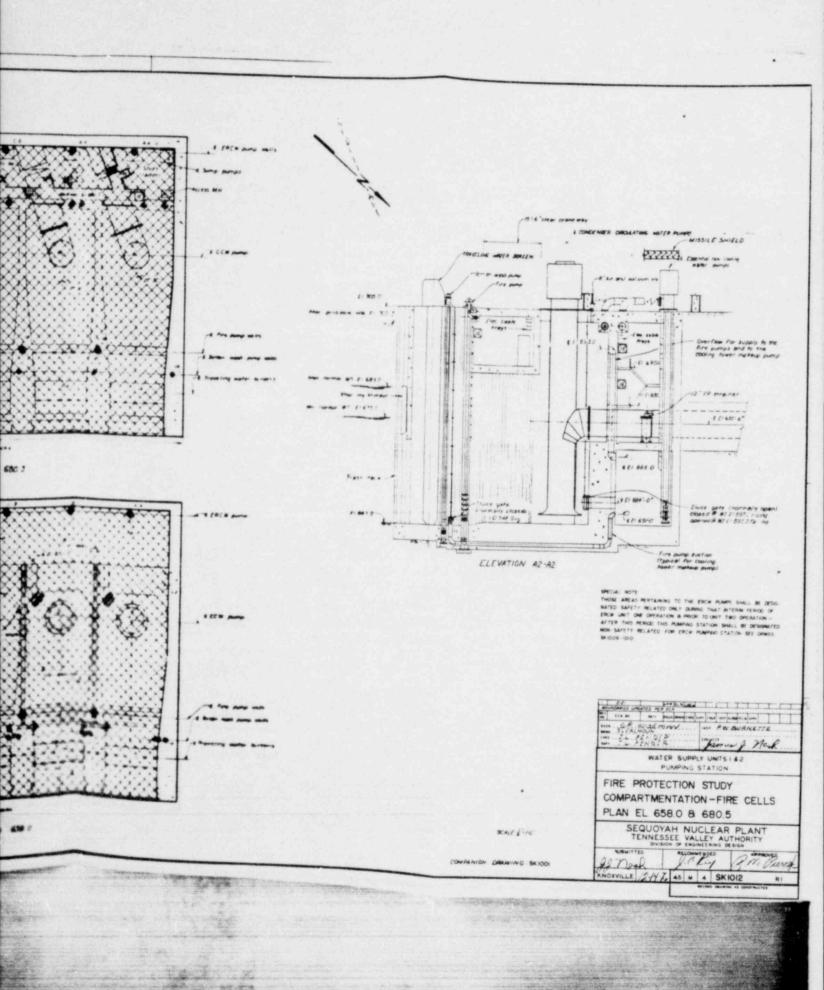
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2. Item B - Administrative Procedures, Controls, and Fire Brigade - You plan to use administrative procedures, controls, and fire brigade programs previously accepted by the staff for the return to service of Browns Ferry, Units Nos. 1 and 2. We request that you review these procedures against the staff supplemental guidance contained in "Nuclear Plant Fire Protection Function Responsibilities, Administrative Controls, and Quality Assurance," dated June 14, 1977. It is our position that you either (1) confirm that your existing administrative procedures and fire brigade program meet the staff supplement guidelines, or (2) provide a commitment that they will be revised accordingly.

TVA Response

We are presently reviewing our administrative procedures, controls, and fire brigade programs against the staff supplemental guidance contained in "Nuclear Plant Fire Protection Function Responsibilities, Administrative Controls, and Quality Assurance," dated June 14, 1977. We plan to revise these procedures accordingly.

3. Item D, General Guidelines for Plant Protection

- A. You state that the majority of the materials used will conform to NFPA definitions of noncombustible or limited combustible material. During our site visit, we noted that some materials such as ventilation duct insulation were not UL listed or FM approved. Therefore, modify your fire hazard analysis to include the limited combustibles or show that these materials will meet the criteria of Section C.4.a(4), BTP ASB 9.5-1, Revision 1.
- B. For the following listed items substantiate their fire resistance capabilities as they pertain to safety-related areas or high hazard areas by verifying that their construction will be in accordance with a particular fire tested design. Identify the design, test method, and acceptance criteria.
 - (i) Rated fire barriers including floor, ceiling, wall systems, structural members and doors. Indicate the type of protective material used and the design number in reference to ASTM E-119.
 - (ii) Fire dampers and fire doors, including the installation of the same in ventilating ducts penetrating fire barriers of safety related areas; fire door dampers are required in a 3 hr. rated fire barrier penetration.
 - (iii) Fire barrier penetration seals around ducts, pipes, cables, cable trays, and conduit or any other openings. Verify that the seals will meet the 3 hr. requirements for ASTM E-119. Verify that the inplant cable tray supports are similar to the ones used in the fire tests and that, in case of collapse of the trays, the resultant unsupported load and torque on the penetration seal will not affect the integrity of the seal.
- C. It is our position that where the fire loadings exceed a 1-1/2 hr. duration (see Table 6-8A, Fire Protection Handbook) and thus, exposes safety related conduit-cables or equipment that such barriers be upgraded to a 3 hr. fire resistance. Confirm that your design will meet this position.
- D. You have not responded to the Appendix A guidelines concerning fire doors being locked and alarmed. Confirm that you will meet this position. In particular, all fire doors used to protect openings in the wall separating the control building from the turbine building be alarmed and annunciated in the control room. These circuits should be electrically supervised.

TVA Response

A. The duct insulation installed in safety-related plant areas has been tested by Underwriters Laboratories and has a flame spread rating of 25 and smoke developed rating of 50. TVA did not require the manufacturer to label the duct insulation.

B. (i) Compartmentation will be provided in accordance with the SK-1000 series compartmentation drawings. These drawings indicate the boundaries where fire-resistive construction and assemblies will be utilized to maintain the integrity of fire areas and fire cells. Additional information is provided in Table 1-1 showing the minimum fire resistive rating of the most limiting structural components in each area or cell.

A minimum three-hour fire resistive rating has been assigned to the construction between the following buildings:

Reactor Building and Auxiliary Building Control Building and Auxiliary Building Service Building and Auxiliary Building Control Building and Turbine Building

The three-hour and 1-1/2-hour rated construction consists of reinforced concrete, reinforced concrete block, or metal lathe and plaster. Construction ratings are assigned based on the equivalency to similar construction denoted by Figure 6-7H of the NFPA Fire Protection Handbook and/or Data Sheet 1-21, Table 2, of Factory Mutual Loss Prevention Data for reinforced concrete and reinforced concrete block walls; and Data Sheet 1-21, Table 4, of Factory Mutual Loss Prevention Data for plaster partitions.

A minimum three-hour fire rated coating of Pyrocrete 102 is applied to all exposed structural steel within the cable spreading room. Applications are in accordance with UL Design No. X-716 and Code approved design based on Design D-717 (BOCA R.R. 73-42-I-C-1-b).

UL-labeled fire door assemblies are provided in openings in most fire cell and fire area boundaries. The assemblies are tested in accordance with UL Standard 10B and have a fire resistance rating at least equivalent to the designated rating of the boundary. The nonlabeled boundary doors are listed in Tables 3.B.(i)-1, 3.B.(i)-2, and 3.B.(i)-3. These doors are identified by number in the SK-1000 series compartmentation drawings.

Table 3.B.(i)-l lists Auxiliary Building special purpose doors which are designed to ASME standards and are of heavy welded steel construction. The doors have multiple side hinges and multiple latch points on the sides, top and bottom. TVA has evaluated these doors and determined that they provide an equivalent fire rating commensurate to the fuel loading in the areas or cells they separate.

Table 3.B.(i)-2 lists the security doors in the Main Control Room. The doors are made of bullet-resistant, heavy gauge steel and have not been tested by UL. However, the door manufacturer has certified that the doors are equivalent to UL tested fire doors rated for three hours.

Table 3.B.(i)-3 lists Auxiliary Building fire-rated door assemblies which will be added in fire wall openings presently containing nonrated doors or no doors.

B. (ii) Fire dampers or fire doors will be provided in ventilation ducts when the ducts penetrate fire barriers. The fire dampers/doors will have a fire resistance rating equivalent to the designated rating of the installed barrier as identified on the SK-1000 series compartmentation drawings.

Fire damper/doors provided after the submission of TVA's Fire Protection Program Reevaluation (forwarded to the NRC by letter from J. E. Gilleland to R. S. Boyd dated January 24, 1977) are UL listed and tested in accordance with UL Standards 10B or 555.

Fire dampers procured and installed prior to the submission of TVA's Fire Protection Program Reevaluation are not UL labeled. These dampers are listed in Tables 3.B.(ii)-l and 3.B.(ii)-2.

The nonlabeled fire dampers identified in Table 3.B.(ii)-l conform to the standards of the National Fire Protection Association that existed when the dampers were procured. These fire dampers have since been certified by the manufacturer to be equivalent to their presently manufactured UL-listed and labeled models. The location of these dampers is show on flow diagrams 47W866-2, -3, -4, and -11.

The fire dampers identified in Table 3.B.(ii)-2 are non-labeled fire dampers procured under identical specifications as the fire dampers in Table 3.B.(ii)-1, but provided by a different manufacturer. These fire dampers comply with the 1966-1967 requirements of NFPA No. 90A. A detailed comparison of construction features of these dampers with the certified dampers identified in Table 3.B.(ii)-1 is presented in Table 3.B.(ii)-4. Construction features such as the frame design, blade dimensions, blade shaft and bearings, linkage, and materials compare favorably. Therefore, TVA feels that the dampers identified in Table 3.B.(ii)-2 are adequate in their installed configuration to provide the required compartmentation. The location of these dampers is shown on flow diagrams 47W866-2, -3, -4, and -11.

Table 3.B.(ii)-3 lists fire dampers which will be added in ventilation ducts penetrating fire barriers presently containing nonrated dampers or no dampers. The location of these dampers is shown on flow diagrams 47W866-2, -3, -4, -8, -9, and -11.

None of the fire dampers or fire doors have been installed in ventilation ducts in strict compliance with UL 555 or manufacturer's instructions. TVA discussed the installation details for these dampers/doors with the NRC Staff on February 12, 1979. It was agreed that the installation details meet the intent of UL 555 with one exception. TVA has installed two dampers, PCO-39-17A and O-31A-148, in ventilation ducts immediately below fire rated ceilings. Each damper will be enclosed in a 1-1/2-hour fire rated barrier that will extend around the ventilation duct to the ceiling.

B. (iii) The design of the Sequoyah electrical penetration fire stops (EPFS) for cables and cable trays and their installation are based on TVA tests of full-scale mockups that must seal against air pressure. The tested design was modified to provide a greater depth of sealant material to give protection equivalent to a 3-hour fire resistance rating. The modification was based on a similar design, using the same type of cables and sealant material, and tests conducted by others to the standard time-temperature curve of ASTM E-119.

The design of the wall and floor electrical penetration fire stops through a fire barrier utilize a separate cable sleeve or slot for each cable tray. The design and installation of these penetration fire stops employ Dow Corning 3-6548 silicone RTV (room temperature vulcanizing) foam as the sealant material and inorganic fire barrier materials. From each side of the wall or floor opening, the cables are separated within the cable sleeve or slot using an inorganic fiber. The sealant material is then installed within the cable sleeve or slot. The cable sleeve opening is covered with a fire barrier board that is cut to fit around the cables and cable tray configuration.

In addition, the exposed surfaces of cables are coated from the fire barrier board for a minimum distance of five feet or to the nearest electrical panel or enclosure with material similar to Flamemastic 77 that is approved by Factory Mutual Research Corporation. Typical electrical penetration firestops through walls and floors are shown in Figures 3.B.(iii)-1 and 3.B.(iii)-2, respectively. The bare metal barrier plate in the cable tray wall penetration shown in Figure 3.B.(iii)-1 will be protected or modified to afford a fire rating at least equivalent to that assigned to the installed fire barrier.

Conduit penetrations, containing cables, through designated fire barriers, utilize RTV silicone rubber as the sealant material. This material is installed around the cables

in either the end of the conduit termination or in the nearest available conduit box on each side of the barrier. Inorganic fiber is used on each side of the sealant material. Spare conduits are plugged or capped until used.

The sealant material used in cable tray penetration fire stops is Dow Corning's 3-6548 silicone RTV foam (components A and B). This material in its cured foam state is noncorrosive and fire resistant. A sample of this material has been tested by an independent laboratory according to ASTM E84, standard method of testing of "Surface Burning Characteristics of Building Materials." The result of the test was that the material has a flame spread rating of 20.

The fire barrier materials used in the design and installation of the penetration fire stops employ a combination of inorganic fiber and fiber board similar to Johns-Manville Cerafiber and Cera Form Board. These materials are made from exceptionally high purity alumina and silica constituents and are capable of withstanding continuous exposure to a temperature range of 2000 to 2300 F.

TVA has conducted fire tests on full-scale assemblies of electrical penetration fire stops that must seal against air pressure. The required differential air pressure across the penetration under test was maintained by adjusting a normal damper together with an exhaust fan in the exhaust duct. An external gas burner was located under the cables outside the area of coated cables. The burner was ignited on the fire side of test facility and allowed to burn for 30 minutes before shutoff. The fire was allowed to self-extinguish; therefore, no water spray test was conducted.

The results of the tests were that no fire burned through the penetration onto the cold side of the test facility and pressure seal maintained its integrity. The results from the tests demonstrate that the design provides an effective fire stop and pressure seal under simulated conditions when tested as a completed system.

In addition, fire tests on similar designs using the same type of cables and sealant material have been conducted

by others. Test results are recorded in report serial No. 26543 dated October 28, 1975, of Factory Mutual Research Corporation. TVA has done a comparative study between the Sequoyah design of cable-cable tray penetration fire stops and cable penetration assemblies tested to ASTM E-119 in Factory Mutual (FM) report No. 26543. From this study TVA has determined that the Sequoyah cable penetration fire stops are equivalent to those portions of the FM test No. 26543 that passed a 3-hour ASTM E-119 fire test.

The installed cable tray supports are similar to those used in the fire tests. From a review of the design of the cable trays supports together with post-test observations of the TVA mockup, we have determined that in case of collapse of trays on the fire side of the barrier, no loss of seal integrity will occur.

The design of the inplant cable tray supports are typically shown in Figures 3.B.(iii)-1 and 3.B.(iii)-2 for wall and floor penetrations with cable trays, respectively. During the tests conducted by TVA, warpage of the cable trays and supports was observed to occur outside the cable coated area. No visual distortion of the cable trays or their supports was observed at the wall opening following the test.

The design of the mechanical penetration fire stops are based on similar designs that use the same type of sealant and damming materials and that have been tested by others to the standard time-temperature curve of ASTM E-119.

The design of the mechanical fire stops utilize pipe sleeves for each penetration. Fire stops for pipe and duct penetrations consist of foamed-in-place Dow Corning 3-6548 silicone RTV foam installed to a depth of 12 inches or the thickness of the wall (minimum 8 inches). A typcial pipe penetration fire stop is shown in Figure 3.B.(iii)-4.

In those pipe penetrations where pipe movements are present, a fire stop assembly consisting of a rolled silicone foam coated ceramic fiber blanket is wrapped around the pipe and stuffed into the sleeve on each side of the penetration. Airtight bellows seals are then installed over these fire stops. A typical fire stop of this type is shown in Figure 3.B.(iii)-5.

Fire tests on similar mechanical penetration fire stop designs have been conducted by Factory Mutual Research Corporation.

The results are recorded in Factory Mutual Report Serial No. 26543 dated October 28, 1975. The tests were performed following the procedures for evaluating floor-ceiling assemblies as defined under the Standard for Fire Testing of Building Construction and Materials ASTM E-119 (NFPA 251).

- C. The following safety-related fire cells have been identified from the fire bazards analysis as having a fire loading greater than 120,000 Btu/ft².
 - (1) Auxiliary Instrument Rooms (unit 1, 685.0-C1; and unit 2, 685.0-C4).
 - (2) Cable Spreading Room (706.0-C2).
 - (3) Diesel Generator Rooms (1A-A, 2A-A, 1B-B, 2B-B).
 - (4) Diesel Generator Lube Oil Storage Room.
 - (5) 480V Electrical Board Rooms (1A-A, 2A-A, 1B-B, 2B-B)
 - (6) Intake Pump Station (E1. 705.0 Upper Deck-ERCW Pump Trains)
 - (7) Additional Equipment Buildings

TVA will provide equivalent three-hour fire rated compartmentation for these fire cells with the exception of the Diesel Generator Rooms and the Auxiliary Instrument Rooms.

The Diesel Generator Rooms and their associated board rooms are not separated by fire barriers. However, the Diesel Generator Room and board room for each diesel generator are separated by three-hour fire rated barriers from the same rooms of other diesel generators.

The unit 1 and unit 2 auxiliary instrument rooms (685.0-Cl and C4) are separated from the Turbine Building and Auxiliary Building by minimum three-hour fire resistant barriers. The Auxiliary Instrument Rooms are separated from each other by two 1-1/2-hour fire resistant barriers, the nonsafety-related computer room, and a corridor. (Refer to compartmentation drawing SK-1006.)

Although the fire loading of each Auxiliary Instrument Room exceeds a 1-1/2-hour duration, the fire loading consists mainly of exposed cable insulation in trays and all exposed cabling within the rooms is coated with a fire retardant material similar to Flamemastic 77.

In addition, each Auxiliary Instrument Room is provided with an automatic total flooding CO₂ system actuated by cross-zoned ionization smoke detectors and rate compensated heat detectors. This is supplemented by a fire hose station located in each stairwell.

As indicated in the response to question 21, loss of either Auxiliary Instrument Room does not prevent the ability to achieve and maintain a safe shutdown condition.

Due to the above considerations, TVA takes the position that the two as-built 1-1/2-hour fire barriers that separate the safety-related Auxiliary Instrument Rooms are adequate.

D. The fire doors listed in Table 3.D-l are alarmed through the security system's primary alarm station in the gatehouse and secondary alarm station in the control building. Refer to the SK-1000 series of compartmentation drawings for details showing door numbers and column lines. TVA does not propose to supervise the operation of other fire doors.

Doors separating the control building from the turbine building are normally closed, heavy equipment doors which are locked and operated by card readers. Operation of these doors (except for flood-pressure door C27) is alarmed in the main control room.

All of the heavy equipment doors separating the control and turbine buildings are augmented by 3-hour rated sliding fire doors which are held open by fusible links. There is no alarm capability associated with the sliding fire doors.

TABLE 3.B.(i)-1

Door	r No. Door Type	Eleva	tion Column	1
A55	Flood door	690.0	s-t,A1	
A57	Flood-press			
A60	Pressure do		12	
A64	Pressure do			
A65	Flood door	690.0		
A77	Pressure do			
A78	Flood door	690.0		
A101	Pressure do			
A105	Pressure do			
A112	Flood door	706.0		
A115	Pressure do	or 706.0		
A123	3 Pressure do	or 714.0		
A132		or 714.0		
A152	2 Pressure do	or 734.0		
A153	Pressure do	or 734.0		
A154	Pressure do			
A159	Pressure do	or 734.0		
A173	Pressure do	or 734.0		
A184	Pressure do	or 749.0		
A191	Pressure do	or 749.0		
A214		or 714.0		
A215	Pressure do	or 714.0	w-x,A3	

TABLE 3.B.(i)-2

Door No.	Door Type	Elevation	Column
C49	Security door	732.0	q,C4-C5 q,C9-C10
C50 C55	Security door Security door	732.0 732.0	n,C9-C10
C56	Security door	732.0	n,C4

TABLE 3.B.(i)-3

Door No.	Elevation	Column	Remarks (See note)
A19 A20 A37 A38 A82 A83 A127 A128 A183 A192	669.0 669.0 669.0 669.0 690.0 714.0 714.0 714.0	s-t,A6-A8 s-t,A5-A6 w,A8-A10 w,A10-A11 q,A4-A5 r-s,A3-A4 u-v,A6-A8 u-v,A8-A10 w-x,A3-A4 w-x,A11-A12	(1) (1) (1) (1) (1) (1) (1) (2) (2)

Notes:

- (1) Fire door modifications identified in Nonconformance Report SWP-78-S-2.
- (2) Modifications resulting from commitments made in response to question 3.B.(i).

TABLE 3.B.(ii)-1

TVA Damper No.	TVA Drawing No.
0-31A-12 0-31A-20 0-31A-25 0-31A-26 0-31A-8 0-31A-39 0-31A-159 PC0-39-17A	47W866-4
0-31A-13 0-31A-21 1-31C-792 2-31C-818 1-31C-793 2-31C-819 1-31C-796	▼ 47W866-3
2-31C-822 1-31C-794 2-31C-820 1-31C-802 2-31C-828 1-31C-829 2-31C-830 1-31C-800 2-31C-826	
1-31C-795 2-31C-821 1-31C-781 2-31C-807 1-31C-1199 2-31C-1333 1-31C-955	47W866-2 47W866-11 47W866-3
2-31C-955 1-31C-777 2-31C-803 1-31C-957 2-31C-957 1-31C-1200 2-31C-1335	47W866-2 47W866-11

TABLE 3.B.(ii)-2

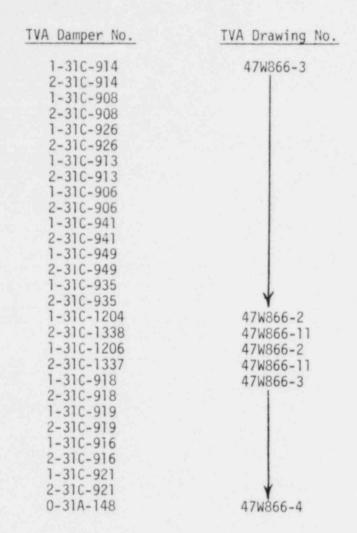


TABLE 3.B.(ii)-3

TVA Damper No.	TVA Drawing No.	Remarks (See note)
0-31A-243 0-31A-231 0-31A-233 0-31A-241 0-31A-242	47W866-4	(2)
0-31A-242 0-31A-236 0-31A-257 1-31C-1219 1-31C-1220	47W866-2	(1)
1-31C-1217 1-31C-1218 2-31C-1221	47W866-3	
2-31C-1222 2-31C-1223 1-31C-611 2-31C-662	47W866-11 47W866-8	(2)
0-30-613 0-30-594	47W866-9	(1)

Notes:

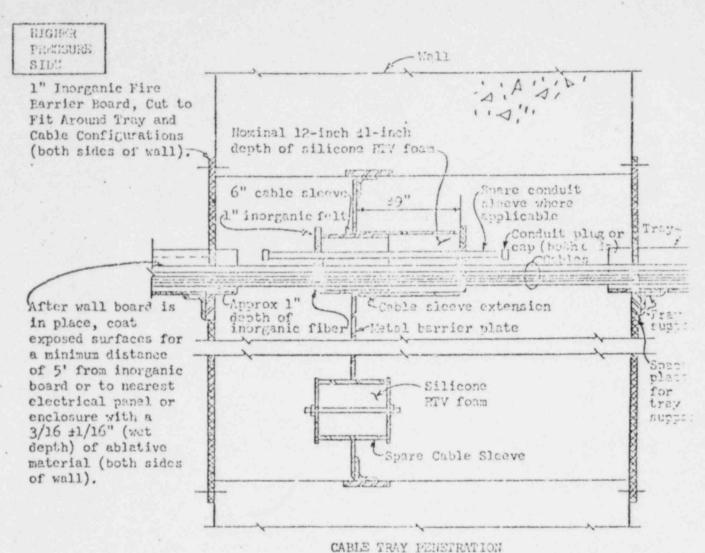
- (1) Fire damper modifications identified in Nonconformance Report SWP-78-S-2.
- (2) Modifications resulting from commitments made in response to question 3.B.(ii).

TABLE 3.B.(ii)-4

Feature	Dowco Corporation and American Foundry and Furnance Co., Model FNM-2003-16 (Non-Labeled)	Ruskin Manufacturing Company Model FD, FD/SS (Certified)
Frame Design	2" x 1/2" x 1/8" HR steel channel - Braced with 1/8" x 1" steel corner brace	3-1/2" x 7/8" x 16 ga. (1/16") galvanized with internally braced corners
Blade Dimensions	7" wide maximum, 16 ga. galvanized steel	6" wide, 16 ga. galvanized steel
Blade Shaft and Bearings	7/16" cadium steel shaft oil impregnated bearings	1/2" zinc plated shaft oilite bronze bearings
Linkage	1/4" diameter cadium plated CR steel	3/16" x 3/4" steel tiebars
Fusible Link	Yes - 160 ⁰	Yes - 160 ⁰
Finish	Zincilate-frame mill galvanized	Mill galvanized

TABLE 3.D-1

A3 Auxiliary 653.0 t-u,A6-A7 A4 Auxiliary 653.0 u-v,A6-A7 A5 Auxiliary 653.0 u-v,A6-A7 A6 Auxiliary 653.0 u-v,A9-A10 A8 Auxiliary 653.0 u-v,A9-A10 A9 Auxiliary 653.0 t-u,A9-A10 A10 Auxiliary 653.0 t-u,A9-A10 A25 Auxiliary 669.0 t-u,A2 A46 Auxiliary 669.0 t-u,A2 A46 Auxiliary 706.0 w-x,A3-A4 A117 Auxiliary 706.0 w-x,A3-A4 A118 Auxiliary 706.0 u-v,A2-A3 A130 Auxiliary 714.0 u-v,A2-A3 A130 Auxiliary 714.0 u-v,A2-A3 A130 Auxiliary 734.0 q-r,A1-A12 A172 Auxiliary 734.0 q-r,A1-A12 A172 Auxiliary 734.0 q-r,A1-A12 A181 Auxiliary 734.0 q-r,A8-A10 A182 Auxiliary 749.0 q-r,A6 A184 Auxiliary 749.0 q-r,A6 A194 Auxiliary 749.0 q-r,A12 A195 Auxiliary 749.0 q-r,A12 A196 Auxiliary 759.0 w-x,A1-A12 A203 Auxiliary 759.0 w-x,A1-A12 A204 Auxiliary 759.0 w-x,A1-A12 A207 Auxiliary 763.0 s-t,A6-A8 C1 Control 669.0 n-p,C3-C4 C1 Control 669.0 n-p,C3-C4 C22 Control 685.0 n-p,C3-C4 C24 Control 685.0 n-p,C3-C4 C25 Control 685.0 n-p,C3-C4 C26 Control 732.0 n-p,C10-C11 C33 Control 706.0 n-p,C3-C4 C55 Control 732.0 n-p,C10-C11 C51 Control 732.0 n-p,C10-C11 C52 Control 732.0 n-p,C10-C11 C55 Control 732.0 n-p,C10-C10 C55 Control 732.0 n-p,C10-C10 C55 Control 732.0 n-p,C10-C10 C55 Control 732.0 n-p,C10-C10 C56 Control 732.0 n-p,C10-C10	Door No.	Building	Elevation	Column
A4 Auxiliary 653.0 t-u,A6-A7 A5 Auxiliary 653.0 u-v,A6-A7 A6 Auxiliary 653.0 v-w,A50A7 A8 Auxiliary 653.0 v-w,A9-A10 A9 Auxiliary 653.0 t-u,A9-A10 A11 Auxiliary 653.0 t-u,A9-A10 A25 Auxiliary 669.0 t-u,A2 A46 Auxiliary 669.0 t-u,A1 A117 Auxiliary 706.0 w-x,A3-A4 A118 Auxiliary 706.0 x-y,A12-A13 A125 Auxiliary 714.0 u-v,A2-A3 A130 Auxiliary 714.0 u-v,A2-A3 A130 Auxiliary 734.0 q-r,A11-A12 A169 Auxiliary 734.0 q-r,A11-A12 A170 Auxiliary 734.0 q-r,A11-A12 A181 Auxiliary 734.0 q-r,A8-A10 A182 Auxiliary 749.0 q-r,A6 A182 Auxiliary 749.0 q-r,A6 A184 Auxiliary 749.0 q-r,A1 A194 Auxiliary 749.0 q-r,A1 A195 Auxiliary 749.0 q-r,A1 A194 Auxiliary 749.0 q-r,A1 A195 Auxiliary 759.0 w-x,A4-A5 A203 Auxiliary 759.0 w-x,A1-A12 A203 Auxiliary 759.0 w-x,A1-A12 A204 Auxiliary 759.0 w-x,A1-A12 A207 Auxiliary 759.0 w-x,A1-A12 A208 Auxiliary 759.0 m-p,C3-C4 C10 Control 669.0 n-p,C3-C4 C10 Control 669.0 n-p,C3-C4 C10 Control 685.0 n-p,C3-C4 C10 Control 685.0 n-p,C3-C4 C22 Control 685.0 n-p,C3-C4 C23 Control 685.0 n-p,C3-C4 C24 Control 685.0 n-p,C3-C4 C25 Control 685.0 n-p,C3-C4 C26 Control 732.0 q-C9-C10 C33 Control 706.0 n-p,C10-C11 C49 Control 732.0 q-C9-C10 C55 Control 732.0 n-p,C10-C11 C55 Control 732.0 n-p,C10-C10 C55 Control 732.0 n-p,C10-C10 C55 Control 732.0 n-p,C9-C10 C55 Control 732.0 n-p,C10-C10		Auxiliary	653.0	t-u.A6-A7
A5 Auxiliary 653.0			653.0	
A6 Auxiliary 653.0 V-w,A9-A10 A9 Auxiliary 653.0 L-v,A9-A10 A10 Auxiliary 653.0 L-v,A9-A10 A11 Auxiliary 653.0 L-u,A9-A10 A125 Auxiliary 669.0 L-u,A2 A46 Auxiliary 669.0 L-u,A2 A46 Auxiliary 706.0 W-x,A3-A4 A118 Auxiliary 706.0 W-x,A3-A4 A118 Auxiliary 714.0 U-v,A2-A3 A130 Auxiliary 714.0 U-v,A2-A3 A130 Auxiliary 714.0 U-v,A13-A14 A169 Auxiliary 734.0 U-v,A13-A14 A170 Auxiliary 734.0 U-v,A13-A14 A181 Auxiliary 734.0 U-v,A13-A14 A182 Auxiliary 734.0 U-v,A13-A14 A183 Auxiliary 734.0 U-v,A13-A14 A184 Auxiliary 734.0 U-v,A13-A14 A185 Auxiliary 749.0 U-v,A13-A14 A186 Auxiliary 749.0 U-v,A13-A16 A187 Auxiliary 749.0 U-v,A13-A16 A188 Auxiliary 749.0 U-v,A13-A16 A189 Auxiliary 749.0 U-v,A13-A16 A180 Auxiliary 749.0 U-v,A13-A16 A181 Auxiliary 749.0 U-v,A13-A16 A182 Auxiliary 749.0 U-v,A13-A16 A189 Auxiliary 749.0 U-v,A13-A16 A190 Auxiliary 749.0 U-v,A13-A16 A191 Auxiliary 749.0 U-v,A13-A16 A189 Auxiliary 749.0 U-v,A13-A16 A180 Auxiliary 749.0 U-v,A13-A16 A181 Auxiliary 749.0 U-v,A13-A16 A181 Auxiliary 749.0 U-v,A13-A16 A182 Auxiliary 749.0 U-v,A13-A16 A183 Auxiliary 749.0 U-v,A13-A16 A184 Auxiliary 749.0 U-v,A13-A16 A185 Auxiliary 749.0 U-v,A13-A16 A180 U-v,A2-A3 Auxiliary 749.0 U-v,A13-A16 A180 U-v,A2-A3 Auxiliary 749.0 U-v,A13-A16 Auxiliary 749.0 U-v,A13-A14 Alta U-v,A13-A14 Alta U-v,A14 Al			653.0	
A8 Auxiliary 653.0 v-w,A9-A10 A10 Auxiliary 653.0 t-v,A9-A10 A11 Auxiliary 653.0 t-u,A9-A10 A25 Auxiliary 669.0 t-u,A2 A46 Auxiliary 669.0 t-u,A1 A117 Auxiliary 706.0 w-x,A3-A4 A118 Auxiliary 706.0 w-x,A1-A13 A125 Auxiliary 714.0 u-v,A2-A3 A130 Auxiliary 714.0 u-v,A2-A3 A130 Auxiliary 734.0 q-r,A11-A12 A170 Auxiliary 734.0 q-r,A11-A12 A170 Auxiliary 734.0 q-r,A8-A10 A181 Auxiliary 734.0 q-r,A8-A10 A182 Auxiliary 749.0 q-r,A6 A182 Auxiliary 749.0 q-r,A6 A194 Auxiliary 749.0 q-r,A1 A195 Auxiliary 749.0 q-r,A10 A203 Auxiliary 749.0 q-r,A10 A203 Auxiliary 759.0 w-x,A4-A5 A204 Auxiliary 759.0 w-x,A1-A12 A207 Auxiliary 759.0 w-x,A1-A12 A207 Auxiliary 763.0 s-t,A6-A8 C1 Control 669.0 n-p,C3-C4 C1 Control 669.0 n-p,C3-C4 C1 Control 685.0 n-p,C3-C4 C22 Control 685.0 n-p,C3-C4 C23 Control 685.0 n-p,C3-C4 C24 Control 685.0 n-p,C3-C4 C25 Control 685.0 n-p,C3-C4 C26 Control 685.0 n-p,C3-C4 C27 Control 685.0 n-p,C3-C4 C28 Control 685.0 n-p,C3-C4 C29 Control 685.0 n-p,C3-C4 C20 Control 732.0 n-p,C10-C11 C30 Control 732.0 q,C4-C5 C50 Control 732.0 n-p,C10-C11 C55 Control 732.0 n-p,C10-C11 C55 Control 732.0 n-p,C10-C10			653.0	
A10 A11 Auxiliary A25 Auxiliary A669.0 A26 A46 Auxiliary A17 A18 Auxiliary A18 Auxiliary A19 A19 A19 A10 A117 Auxiliary A118 Auxiliary A118 Auxiliary A118 Auxiliary A119 A125 Auxiliary A110 A203 Auxiliary A110 A204 Auxiliary A207 Auxiliary A208 Auxiliary A209 Auxiliary A200 A				
A10 All Auxiliary 653.0 All Auxiliary 653.0 All Auxiliary 669.0 A25 Auxiliary 669.0 A46 Auxiliary 706.0 All Auxiliary 706.0 Auxiliary 714.0 All All Auxiliary 714.0 All All Auxiliary 714.0 All			653.0	L-V, A9-A10
A25 A46 A46 Auxiliary A46 Auxiliary A17 Auxiliary A18 Auxiliary A18 Auxiliary A19			653.0	t-u, A9-A10
A46 A117 Auxiliary A118 Auxiliary A125 Auxiliary A130 Auxiliary A169 A170 Auxiliary A170 Auxiliary A181 Auxiliary A181 Auxiliary A170 Auxiliary A170 Auxiliary A181 Auxiliary A182 Auxiliary A182 Auxiliary A194 Auxiliary A195 Auxiliary A203 Auxiliary A204 Auxiliary A207 Auxiliary A208 C1 Control C10 Control C21 Control C30 Control C31 Control C32 Control C33 Control C33 Control C34 Control C35 Control C35 Control C36 C01				t-u, A9-A10
Al17 Al18 Auxiliary Al25 Auxiliary Al26 Al30 Auxiliary Al40 Auxiliary Al50 Auxiliary Al60 Auxiliary Al70 Auxiliary Al70 Auxiliary Al60 Auxiliary Al70 Auxiliary Al70 Auxiliary Al80 Auxiliary Al90 Auxili			669.0	t-u,A2
Al18			669.0	t-u, A14
A125 Auxiliary 714.0			706.0	w-x, A3-A4
A130 A130 Auxiliary A169 Auxiliary A170 A170 Auxiliary A172 A172 A181 A182 A182 Auxiliary A194 A195 Auxiliary A203 Auxiliary A204 Auxiliary A207 C1 C0ntrol C12 Control C21 Control C21 Control C22 Control C33 Control C33 Control C33 Control C33 Control C33 Control C33 Control C44 C05		Auxiliary	706.0	x-y, A12-A13
A169			714.0	u-v, A2-A3
A170			714.0	
A172				q-r,A11-A12
A181			734.0	g-r,A11-A12
A182			734.0	g-r, A8-A10
A194 Auxiliary 749.0 q-r,A12 A195 Auxiliary 749.0 q-r,A10 A203 Auxiliary 759.0 w-x,A4-A5 A204 Auxiliary 759.0 w-x,A11-A12 A207 Auxiliary 763.0 s-t,A6-A8 C1 Control 669.0 n-p,C3-C4 C10 Control 669.0 n-p,C9-C10 C12 Control 685.0 n-p,C10-C11 C21 Control 685.0 n-p,C3-C4 C22 Control 685.0 n-p,C6-C7 C23 Control 685.0 n-p,C6-C7 C24 Control 685.0 n-p,C6-C7 C25 Control 685.0 n-p,C10-C11 C30 Control 685.0 n-p,C10-C11 C30 Control 706.0 n-p,C10-C11 C30 Control 706.0 n-p,C10-C11 C49 Control 732.0 q,C4-C5 C50 Control 732.0 q,C4-C5 C50 Control 732.0 n-p,C12-C13 C52 Control 732.0 n-p,C10 C55 Control 732.0 n-p,C10 C55 Control 732.0 n-p,C10 C55 Control 732.0 n-p,C10 C55 Control 732.0 n-p,C10			749.0	q-r,A6
A195 Auxiliary 749.0 q-r,A10 A203 Auxiliary 759.0 w-x,A4-A5 A204 Auxiliary 759.0 w-x,A11-A12 A207 Auxiliary 763.6 s-t,A6-A8 C1 Control 669.0 n-p,C3-C4 C10 Control 669.0 n-p,C9-C10 C12 Control 685.0 n-p,C10-C11 C21 Control 685.0 n-p,C3-C4 C22 Control 685.0 n-p,C6-C7 C23 Control 685.0 n-p,C6-C7 C24 Control 685.0 n-p,C6-C7 C25 Control 685.0 n-p,C10-C11 C30 Control 685.0 n-p,C10-C11 C30 Control 706.0 n-p,C10-C11 C30 Control 706.0 n-p,C10-C11 C49 Control 732.0 q,C4-C5 C50 Control 732.0 q,C9-C10 C51 Control 732.0 n-p,C12-C13 C52 Control 732.0 n-p,C10 C55 Control 732.0 n-p,C10-C10 C55 Control 732.0 n-p,C10 C55 Control 732.0 n-p,C10 C55 Control 732.0 n-p,C10 C55 Control 732.0 n-p,C10				q-r,A4
A203 Auxiliary 759.0 w-x,A4-A5 A204 Auxiliary 759.0 w-x,A11-A12 A207 Auxiliary 763.0 s-t,A6-A8 C1 Control 669.0 n-p,C3-C4 C10 Control 669.0 n-p,C9-C10 C12 Control 669.0 n-p,C10-C11 C21 Control 685.0 n-p,C3-C4 C22 Control 685.0 n-p,C6-C7 C23 Control 685.0 n-p,C6-C7 C24 Control 685.0 n-p,C7-C8 C25 Control 685.0 n-p,C10-C11 C30 Control 685.0 n-p,C10-C11 C30 Control 706.0 n-p,C10-C11 C30 Control 706.0 n-p,C10-C11 C49 Control 732.0 q,C4-C5 C50 Control 732.0 n-p,C12-C13 C51 Control 732.0 n-p,C10 C55 Control 732				q-r,A12
A204 Auxiliary 759.0 w-x,All-Al2 A207 Auxiliary 763.0 s-t,A6-A8 Cl Control 669.0 n-p,C3-C4 Cl0 Control 669.0 n-p,C9-Cl0 Cl2 Control 685.0 n-p,C3-C4 C22 Control 685.0 n-p,C6-C7 C23 Control 685.0 n-p,C6-C7 C24 Control 685.0 n-p,C6-C7 C25 Control 685.0 n-p,C10-Cl1 C30 Control 685.0 n-p,C7-C8 C25 Control 685.0 n-p,C10-Cl1 C30 Control 706.0 n-p,C10-Cl1 C30 Control 706.0 n-p,C10-Cl1 C49 Control 732.0 q,C4-C5 C50 Control 732.0 q,C4-C5 C50 Control 732.0 n-p,C12-Cl3 C51 Control 732.0 n-p,C10 C51 Control 732.0 n-p,C10 C55 Control 732.0 n-p,C10 C55 Control 732.0 n-p,C10 C55 Control 732.0 n-p,C10 C55 Control 732.0 n-p,C10				q-r,A10
A207 Auxiliary 763.0 s-t,A6-A8 C1 Control 669.0 n-p,C3-C4 C10 Control 669.0 n-p,C9-C10 C12 Control 685.0 n-p,C10-C11 C21 Control 685.0 n-p,C3-C4 C22 Control 685.0 n-p,C6-C7 C23 Control 685.0 n-p,C6-C7 C24 Control 685.0 n-p,C7-C8 C25 Control 685.0 n-p,C10-C11 C30 Control 706.0 n-p,C10-C11 C30 Control 706.0 n-p,C10-C11 C49 Control 732.0 q,C4-C5 C50 Control 732.0 q,C4-C5 C51 Control 732.0 n-p,C12-C13 C52 Control 732.0 n-p,C10 C55 Control 732.0 n-p,C10 C55 Control 732.0 n-p,C10 C56 Control 732.0 n-p,C10 C57 Control 732.0 n-p,C10 C58 Control 732.0 n-p,C10 C59 Control 732.0 n-p,C10 C59 Control 732.0 n-p,C10 C59 Control 732.0 n-p,C10 C59 Control 732.0 n-p,C10				w-x, A4-A5
C1				w-x, A11-A12
C10				s-t, A6-A8
C12				n-p,C3-C4
C21				n-p,C9-C10
C22				n-p,C10-C11
C23				n-p,C3-C4
C24 Control 685.0 n-p,C7-C8 C25 Control 685.0 n-p,C10-C11 C30 Control 706.0 n-p,C10-C11 C33 Control 706.0 n-p,C10-C11 C49 Control 732.0 q,C4-C5 C50 Control 732.0 q,C9-C10 C51 Control 732.0 n-p,C12-C13 C52 Control 732.0 n-p,C10 C55 Control 732.0 n-p,C10 C55 Control 732.0 n-p,C10				n 2,06-07
C25				n-p,C6-C7
C30				n-p,C7-C8
C33				n-p,C10-C11
C49				n-p, C3-C4
C50 Control 732.0 q,C9-C10 C51 Control 732.0 n-p,C12-C13 C52 Control 732.0 n-p,C10 C55 Control 732.0 n-p,C10				n-p,C10-C11
C51 Control 732.0 n-p,C12-C13 C52 Control 732.0 n-p,C10 C55 Control 732.0 n-p,C9-C10				q,C4-C5
C52 Control 732.0 n-p,C10 C55 Control 732.0 n-p,C9-C10				9,09-010
C55 Control 732.0 n-p,C9-C10				n-p,C12-C13
C55 Control 732.0 n-p,C9-C10				
C56 Control 732.0 n-p,C4-C5			732.0	
	C56	Control	732.0	n-p,C4-C5



Typical of Wall Opening with Metal Barrier

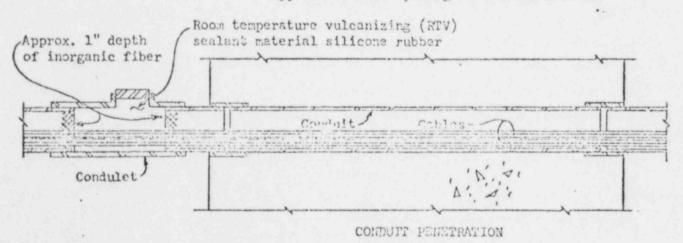
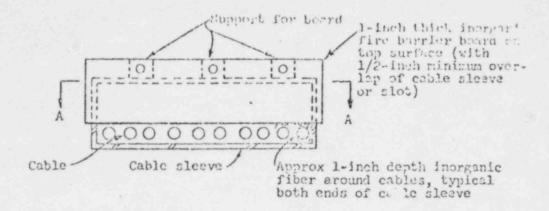


Figure 3.E.(iii)-1
Typical Horizontal Electrical Penetration
Fire Stops through Wall



TOP PLAN VIEW

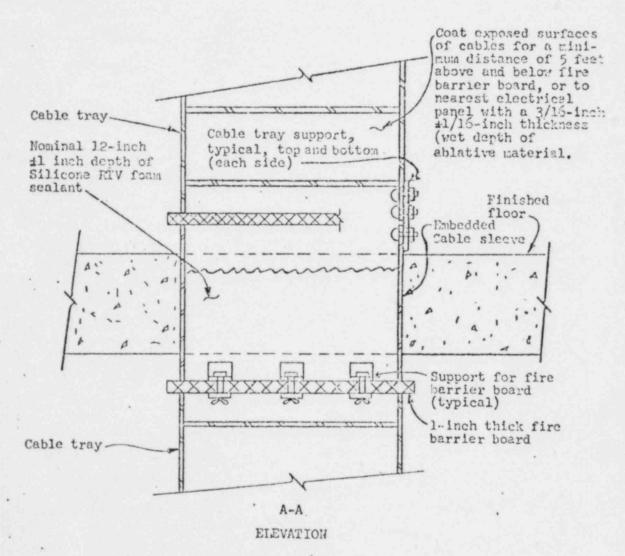


Figure 3.B.(iii)-2

Typical Vertical Electrical Penetration Fire Stop through Floor with Embedded Cable Sleeve

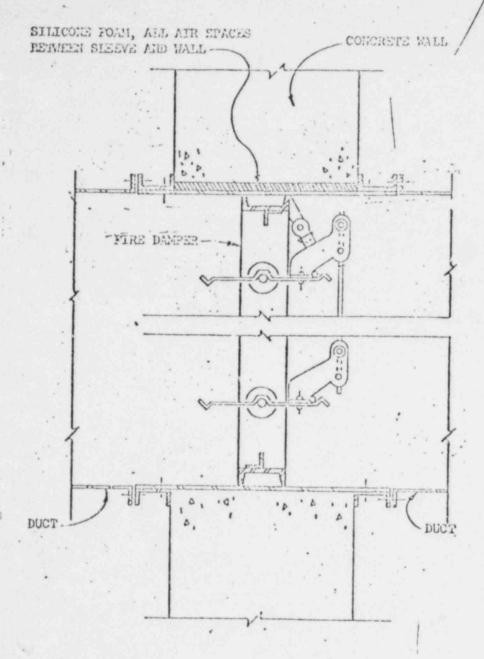


Figure 3.B.(iii)-3 TYPICAL FIRE DAMPER PENETRATION FIRE STOP

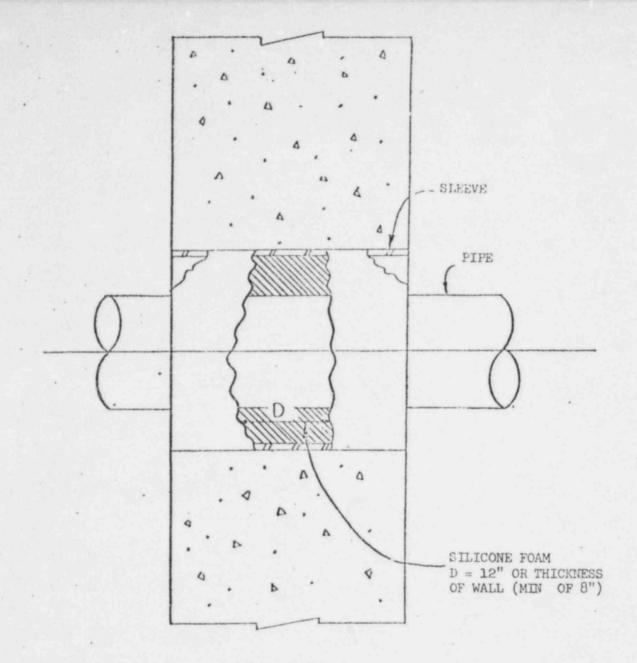


FIGURE 3.B.(iii)-4
TYPICAL PIPE PENETRATION FIRE STOP
(WITHOUT PIPE MOVEMENTS)

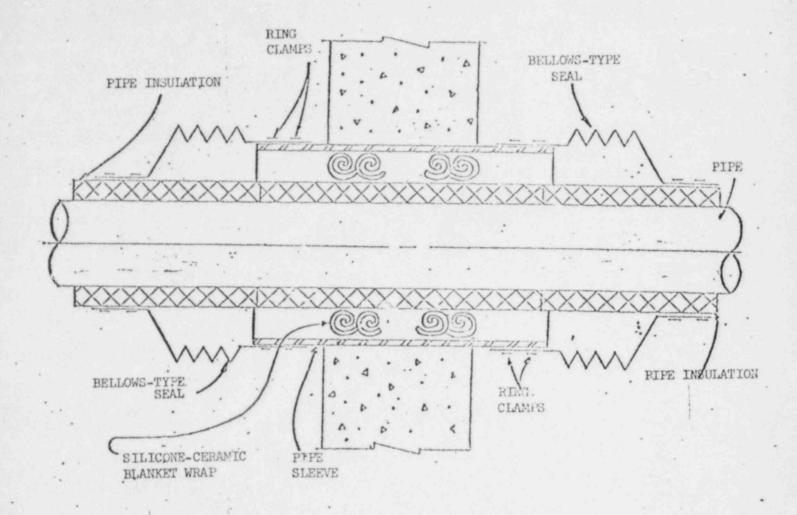
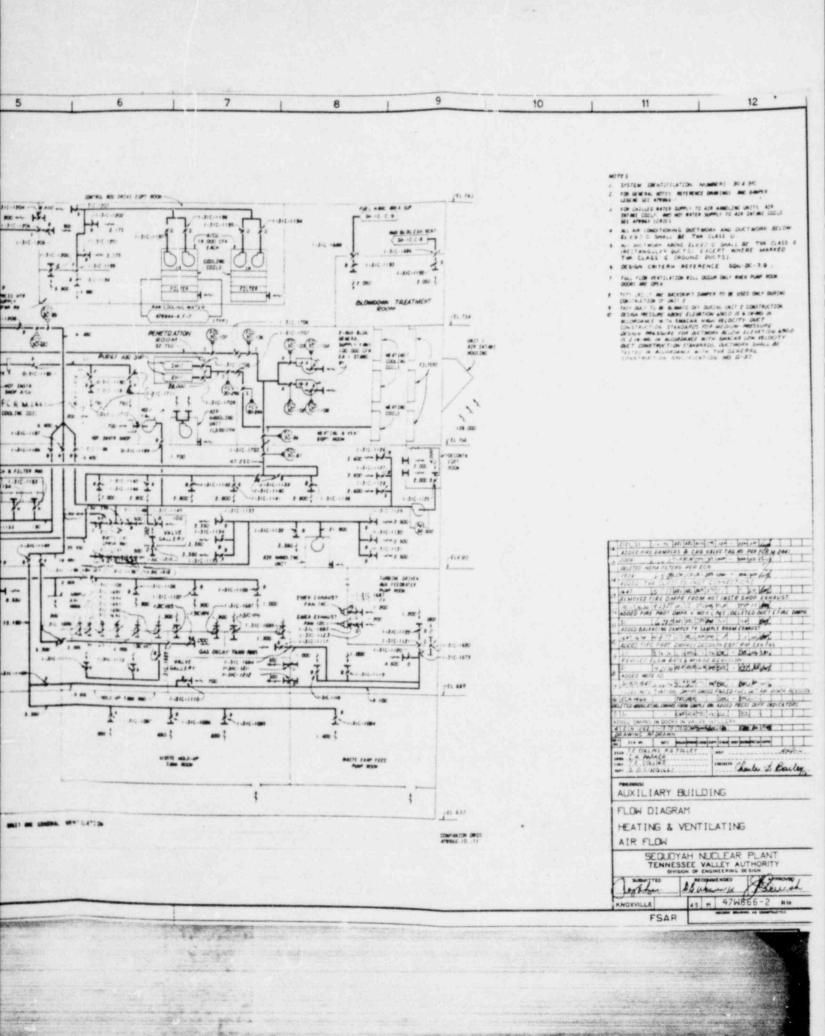
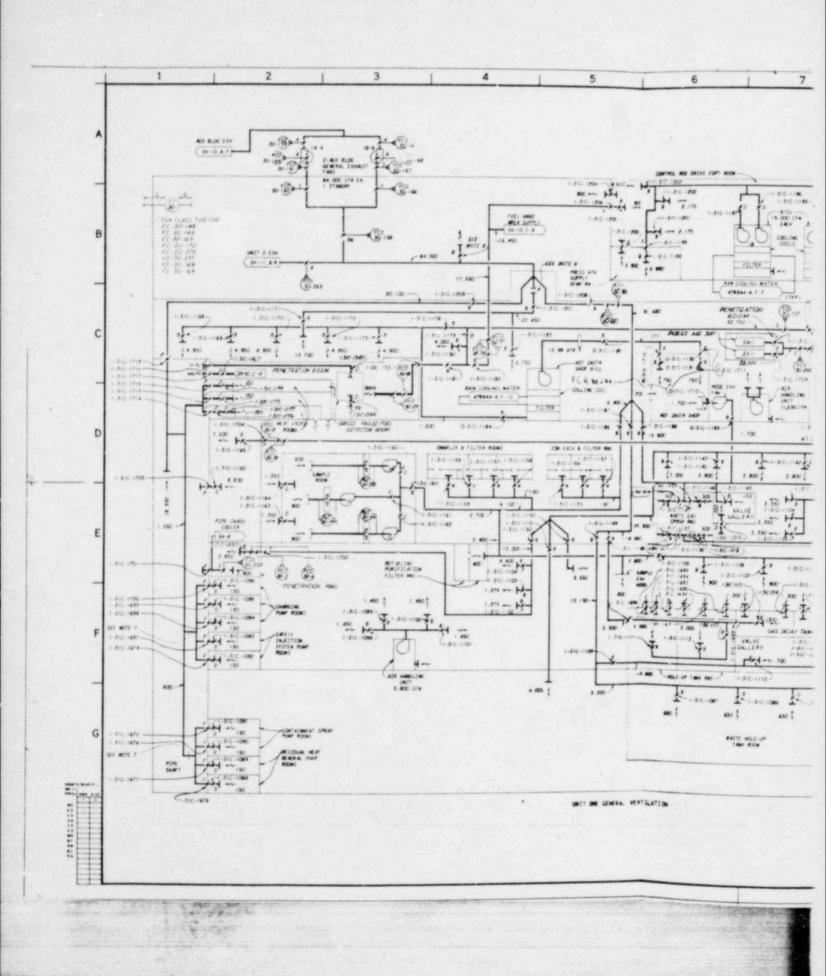
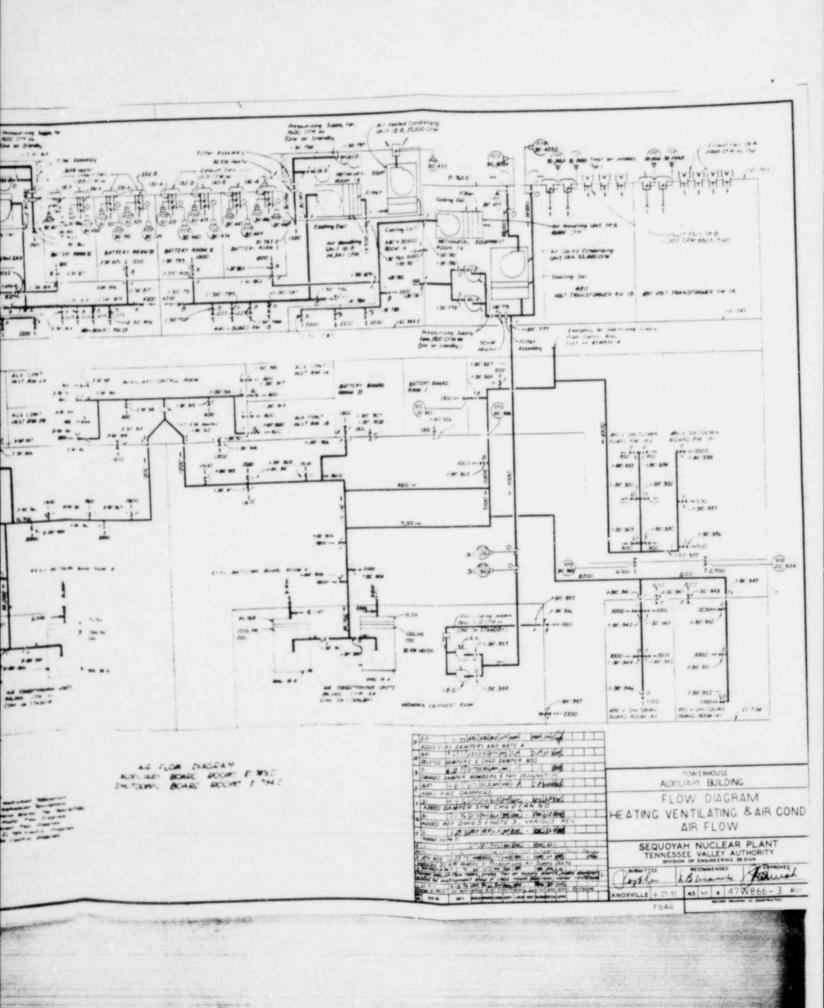
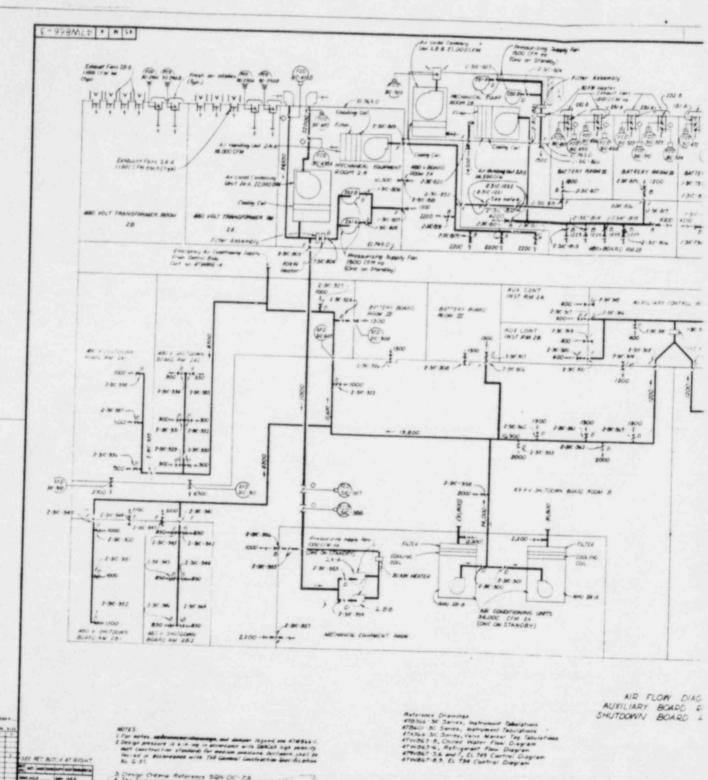


FIGURE 3.B.(iii)-5
TYPICAL PIPE PENETRATION FIRE STOP
(WITH PIPE MOVEMENTS)





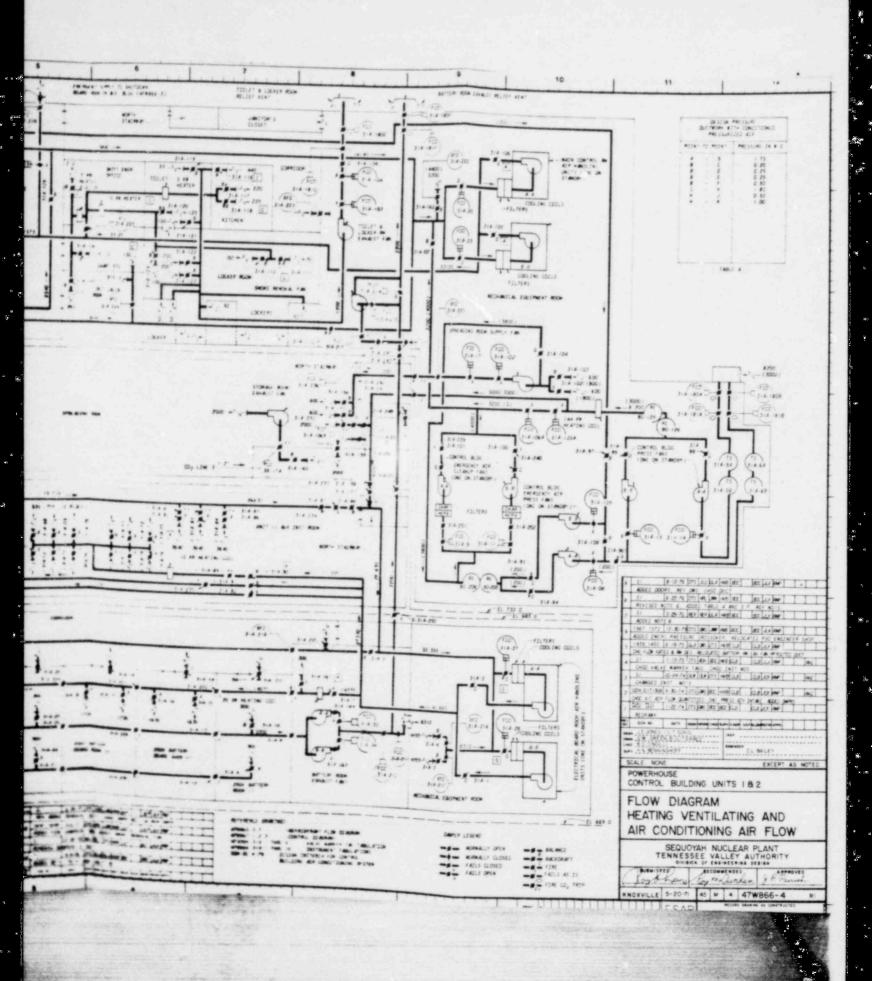




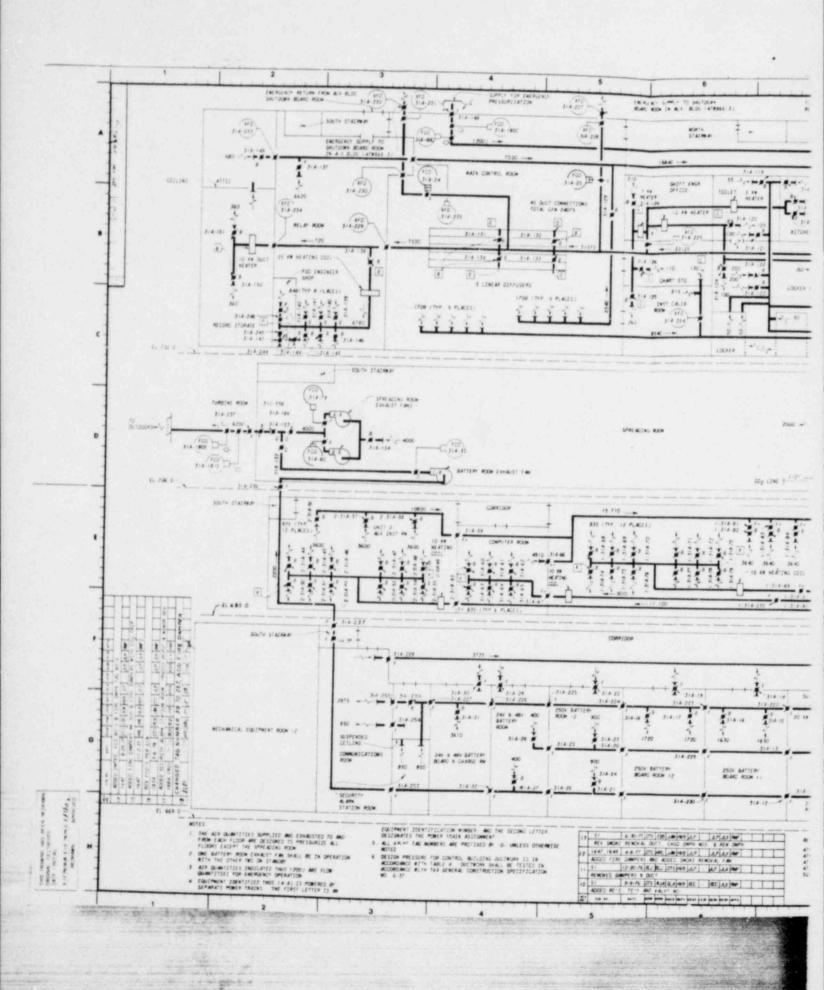
3. Orango Orderia Reference SQN-DE-72.

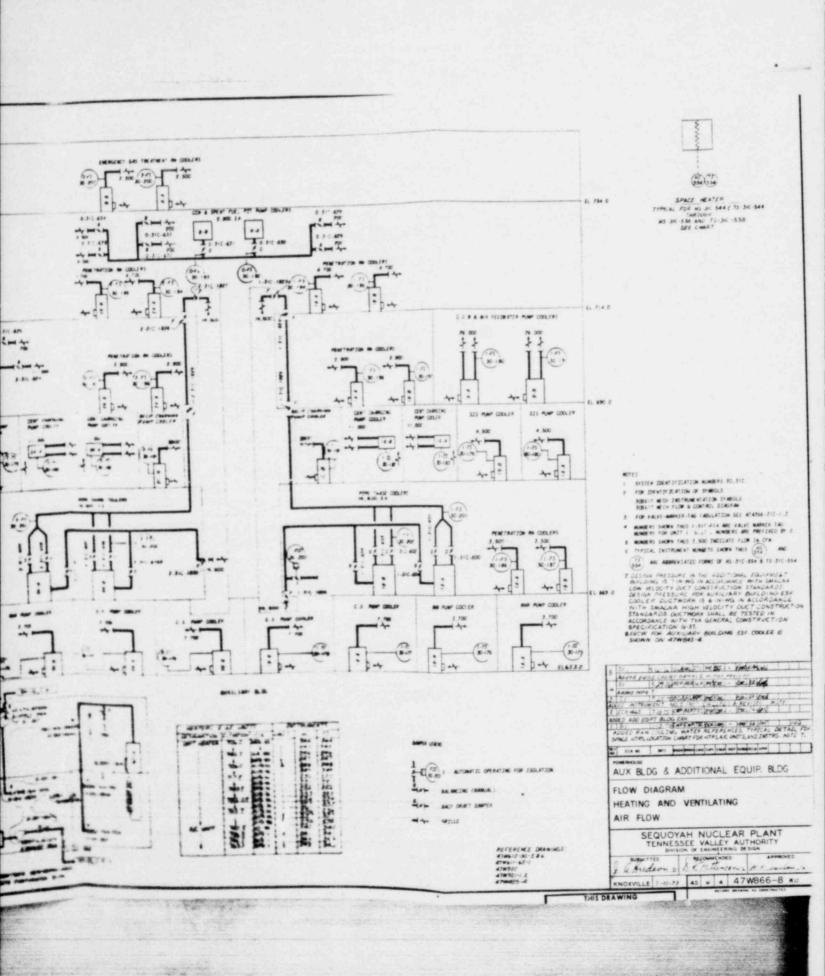
4. The duct containing races first democra passes through the ellow Bears Ra & 480 V Paran Ran 844.25 AND 480 V & Rm 28 to Battery Rm IX. There is a first damper in each set).

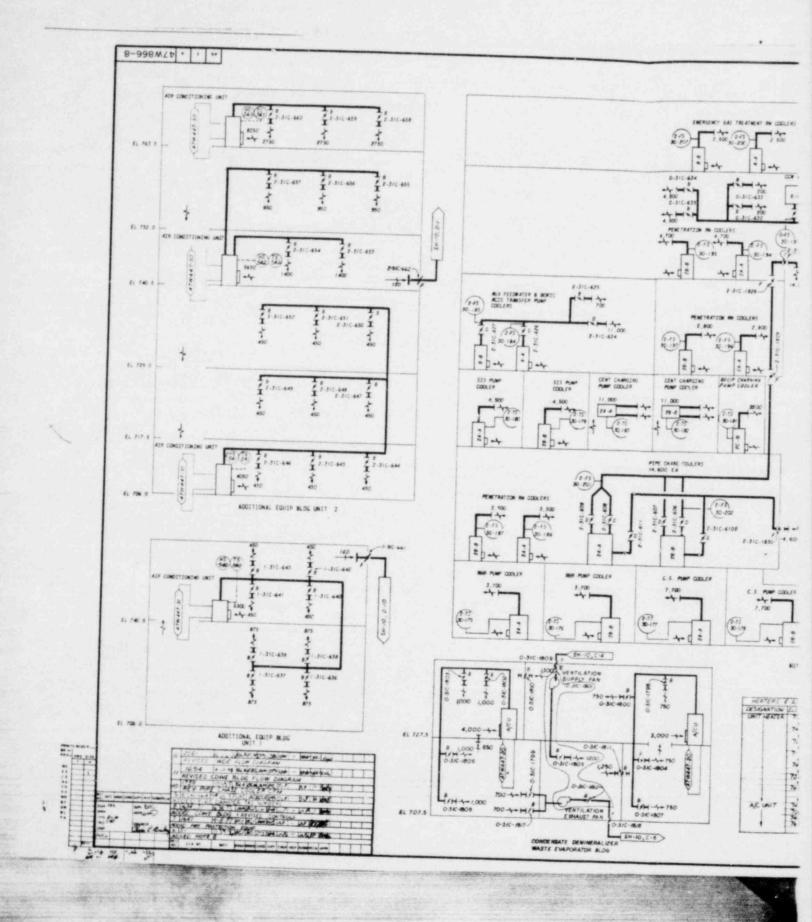
32 10 mg 10 10 10 10 10

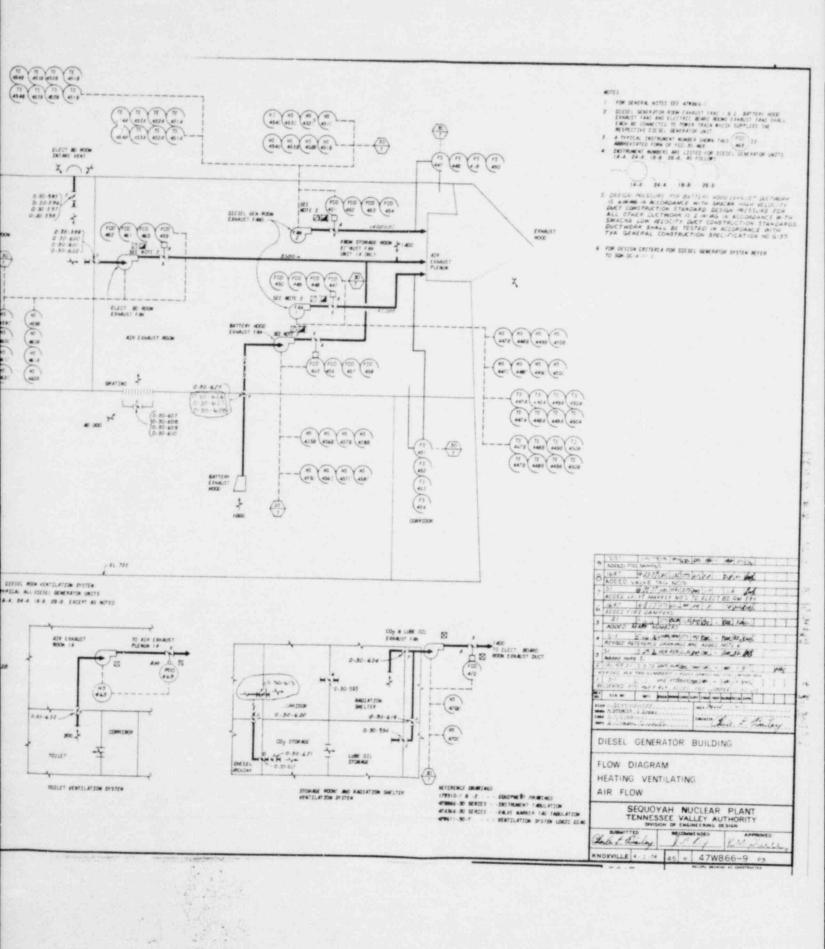


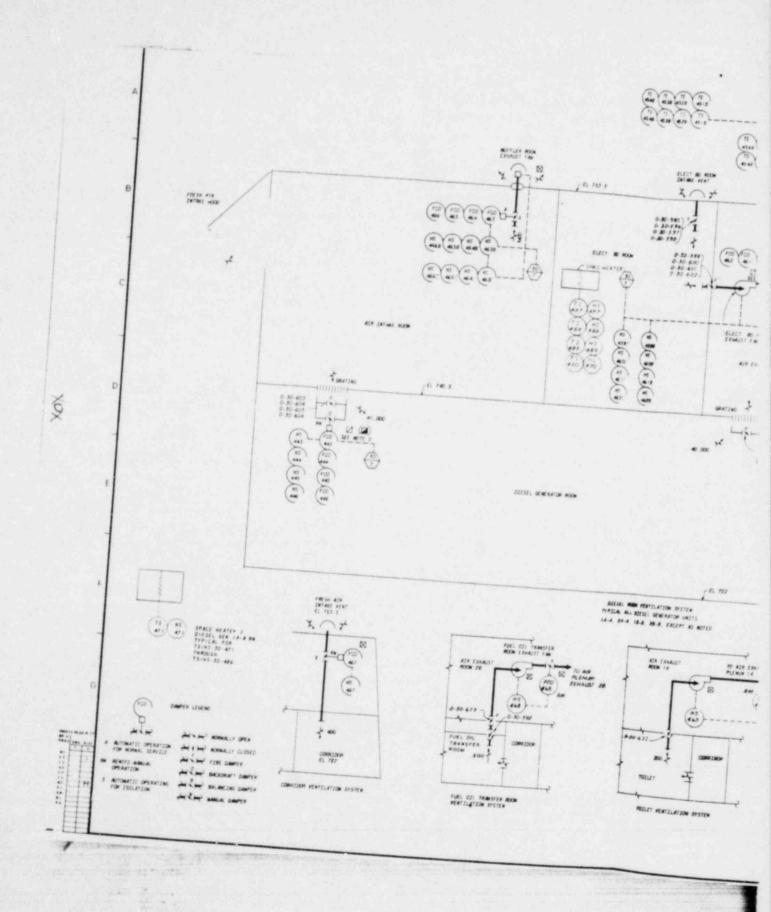
Baski⊸a °e a z est e

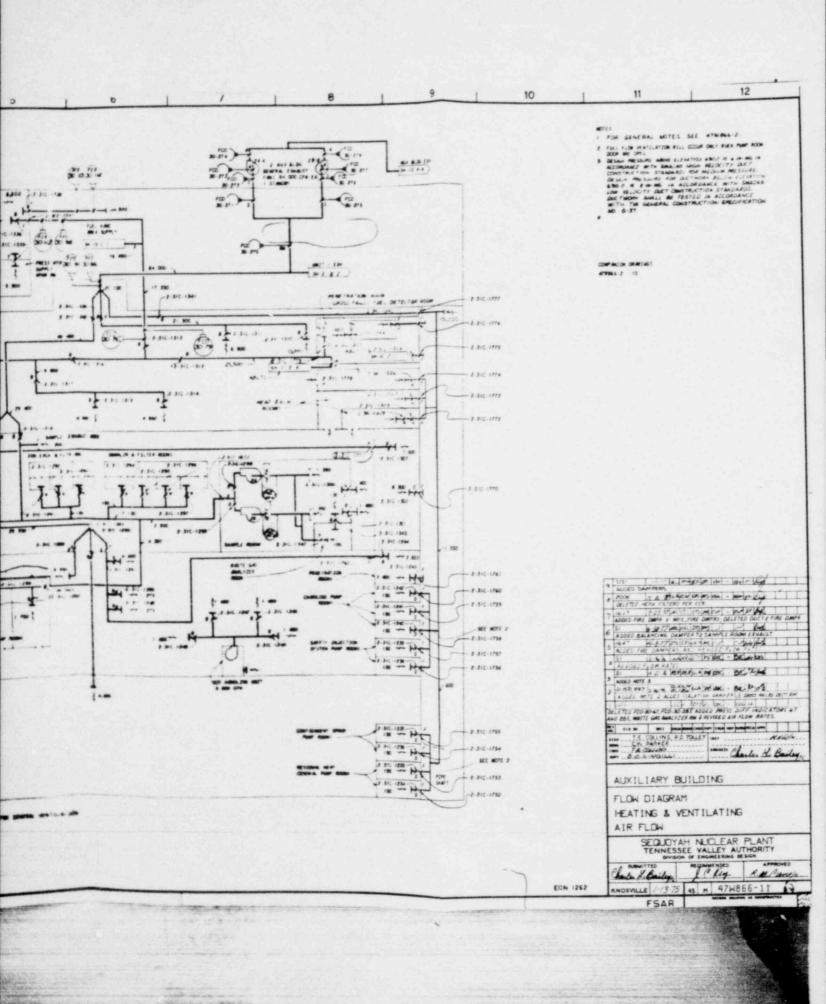


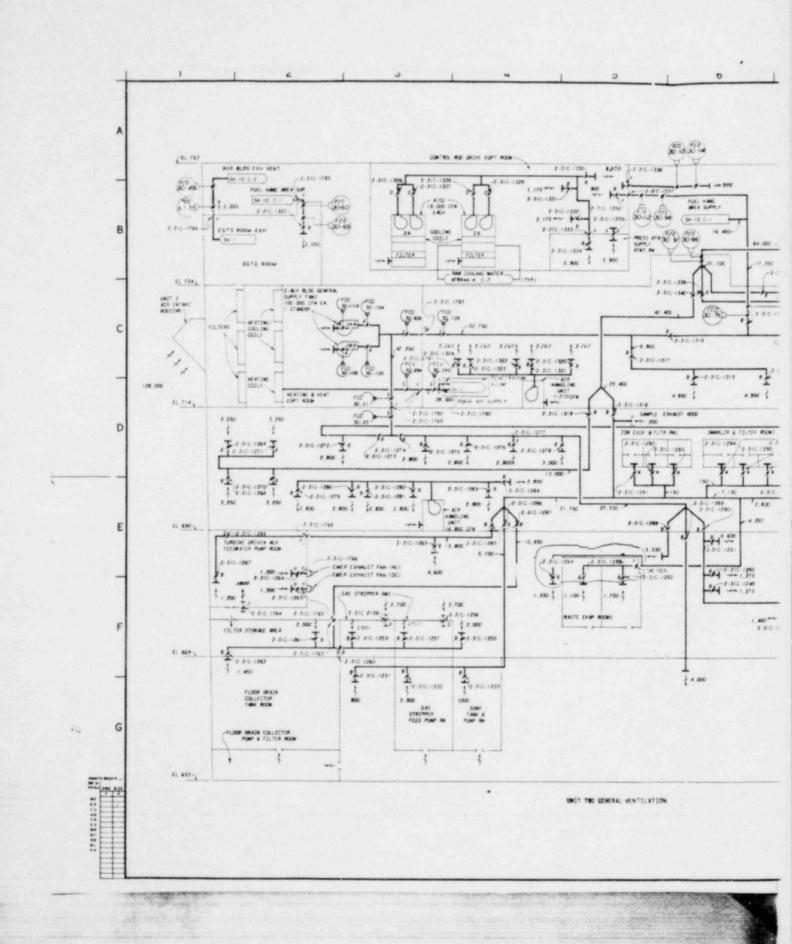












4. Item 3.e. - It is our position that fire stops be installed every 20 ft. along horizontal uncoated cable routings in areas not protected by automatic water systems. Between levels or in vertical uncoated cable chases, fire stops should be installed at the midheight if the vertical run is 20 ft. or more, but less than 30 ft. or at 15-foot intervals in vertical runs of 30 ft. or more unless such vertical cable routings are protected by automatic water systems directed on the cable trays. Individual fire stop designs should prevent the propagation of a fire for a minimum period of 30 minutes when tested for the largest number of cable routings and maximum cable density. Confirm that your design will meet this position.

TVA Response

In areas outside primary containment containing one or both safety-related divisions, all exposed surfaces of cables in horizontal or vertical routings will be coated with a flame-retardant material such as Flamemastic 77. Thus, the design meets the stated NRC position and no fire stops will be installed at intervals in horizontal or vertical routings.

5. Item D.4, Ventilation - Describe the procedure employed for heat and smoke removal using fixed or portable equipment in areas that house systems or components necessary for cold shutdown of the plant. Describe how these areas can be ventilated for manual firefighting purposes. Include a discussion regarding control accesses to ventilation equipment (including fire dampers) as well as the ability to handle high temperature gases and particulates.

TVA Response

In general, heat and smoke removal capability is provided in areas that house systems or components necessary for cold plant shutdown by the normal ventilation systems discussed in FSAR Section 9.4. A developing fire will cause the isolation of these ventilation systems in the immediate vicinity of the fire through the closing of fusible link or fire detector actuated dampers. Smoke venting at this point will be accomplished by the use of portable smoke ejectors. Two ejectors are provided for the use of the fire brigade and each is rated at 7200 cfm. Smoke will be vented from a fire area to adjacent areas, where it will be removed by the normal ventilation systems.

Those areas of the plant utilizing recirculating ventilation systems will rely upon portable smoke ejectors exclusively.

Due to containment requirements, smoke removal in the reactor building will be provided by the containment purge air system. Should the smoke and fire gas temperatures exceed the capability of the containment purge air system, it will be isolated and smoke removal will be accomplished by the redundant trains of the standby gas treatment systems.

6. Item D.5, Lighting and Communication

- A. Item (a). You state that adequate emergency lighting system is provided in safety-related areas of the plant. Power supply for the system is from the plant emergency diese! generator. Your proposed emergency lighting system is unacceptable. It is our position that fixed self-contained lighting consisting of fluorescent or sealed beam units with an individual 8 hr. minimum battery power supply be provided in areas that must be manned for safe cold shutdown and for access and egress routes to and from all fire areas.
- B. Item (d). You indicate that fixed repeaters are being installed in the Sequoyah plant to facilitate the use of portable radio equipment. It is our position, however, that the fixed repeaters should be protected against exposure fire damage using 1/2 hour fire rated barriers such as 1" mineral wool. In addition, verify that the portable radio communication system will be tested to demonstrate that its frequencies will not interfere with the actuation of protective relays.

TVA Response

- A. Item (a). Fixed self-contained lighting consisting of fluorescent or sealed beam units with an individual 8 hour minimum battery power supply will be provided in areas that must be manned for safe cold shutdown and for access and egress routes to and from all fire areas.
- B. Item (d). The protection of fixed radio repeaters by 1/2 hour fire rated barriers such as mineral wool is not feasible since the repeater would be damaged by overheating. It is TVA's position that such protection is not necessary due to the redundancy and physical separation of the repeaters.

There are three independent intraplant radio repeater systems at Sequoyah. Two of these systems known as the inplant repeaters, operate with 26 two-channel portable radios (this group includes the six fire brigade portables). One of these repeaters is located in the turbine building and one is located in the auxiliary building, providing multiple fire barriers between systems. The associated protables can address either of these repeaters.

The third intraplant repeater system (the public safety service repeater system) consists of one repeater located in the turbine building and 18 portable radios. These portable radios have three channels capable of addressing all three intraplant repeater systems. The public safety service repeater is located on a different turbine building elevation from one inplant repeater and in a different building from the other.

The portable radio communication system will be tested during the preoperational test program to demonstrate that its frequencies will not interfere with other plant systems. 7. Item E.1, Fire Detection - Your description of the fire detection system is incomplete. Describe the type of detector provided for each room or area containing safety related equipment or systems. Also, provide a detailed description of the fire detection system, supported where necessary, by diagrams or appropriate prints (include a single line draiwing from the detection circuits, waterflow alarms, through the subpanels and into the control room).

It is our position that primary and secondary power be supplied as follows:

- A. Using normal offsiste power as the primary supply with a 4 hr. battery supply as secondary supply; and
- B. Having capability for manual connection to the Class IE emergency power, but within 4 hrs. of loss of offsite power. Such connection should follow the applicable guidelines in Regulatory Guides 1.6, 1.32, and 1.75. Confirm that your design will mee* this position.

TVA Response

The fire detection system complies with the requirements of BTP 9.5-1, Appendix A, and is designed in accordance with NFPA 72D and 72E. The system consists of initiating devices, local control panels, remote transmitter-receivers providing remote multiplex (MUX) functions, and computerized multiplex central control equipment. Refer to Figure 7-1 for a block diagram of the system.

The system's initiating devices consist of fire detectors which are identified as to type and location in Table 1-1 and flow alarm pressure switches which are provided for each fixed suppression system.

A central processor unit (CPU) communicates with the local control panels via the remote MUX units over looped circuits. The MUX equipment allows the processor to interrogate each local control panel in turn and to receive data from the panels. When an initiating device changes from normal to a trouble or alarm status, it detected at the remote MUX transmitter-receiver and when next interrogated by the central processor will transmit this status change. The change is evaluated by the processor and visual and audible indications provided.

An alarm condition results in the following system responses:

- (1) Sounding of audible devices locally and in the main control room.
- (2) Illumination of indicating lamps on the local control panel indicating the location of the alarming device.
- (3) Actuation of local control panel circuits for the control of automatic suppression systems, fire pumps, fire dampers, fire doors, and ventilation equipment.

(4) Identification of the location and time of receipt of the alarm condition on a cathode ray tube (CRT) display in the main control room and on a line printer in the unit 2 auxiliary instrument room.

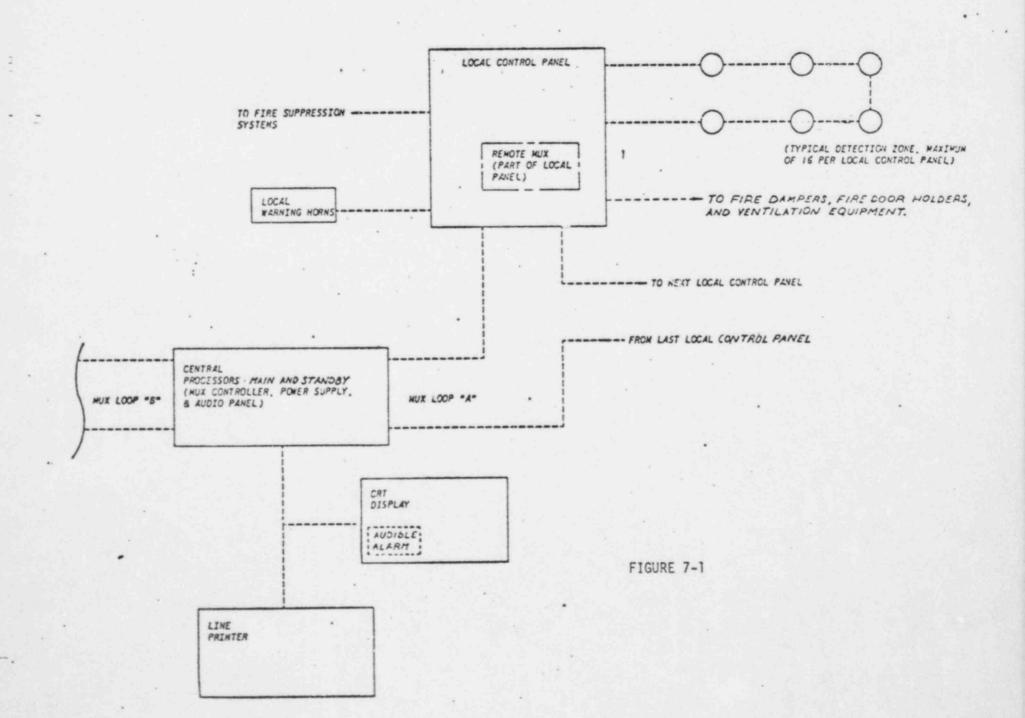
The fire detection system is electrically supervised as required in NFPA 72D Article 240, for ground and open wiring faults in the detection, power supply, alarm, and data transmission circuits. Electrical supervision of the supplementary output circuitry that actuates fire suppression systems, fire dampers, fire door holders, and ventilation equipment is not provided. However, TVA will check these supplemental circuits every 18 months for operability. Supervision is Class A in the detection and data transmission circuits and Class B in the local audible alarm circuits. A wiring fault in the supervised circuits results in an audible and visual trouble indication at both the local and control locations. The system is capable of processing and displaying multiple alarm and trouble conditions.

A second CPU is provided in the main control room as an installed spare. 'pon failure of the primary processor, the spare can be connerced to the system by jumper cables in less than 30 minutes.

The fire detection system is powered from a single 120V ac distribution panel as shown in Figure 7-2. The panel is provided with a manual transfer switch to allow normal or alternate power feed from 480V ac control and auxiliary building ventilation boards 1A1-A and 2A1-A, respectively. Both ventilation boards are automatically connected after 10 seconds to the emergency diesel generators on loss of offsite power. The system's power supply complies with the applicable guidelines in Regulatory Guides 1.6 and 1.32 and partially complies with Regulatory Guide 1.75 as discussed in FSAR section 8.3. The fire protection power distribution panel will be electrically supervised to provide an alarm in the main control room upon loss of power.

The momentary loss of power to the CPU resulting from the transfer to the diesel generators will cause a loss of the CRT display in the main control room. However, when power is restored, all persisting alarm and trouble conditions will be redisplayed.

Fire detection system components are located as identified in Table 7-1. Refer to compartmentation drawing SK-1004 for definition of the column lines.



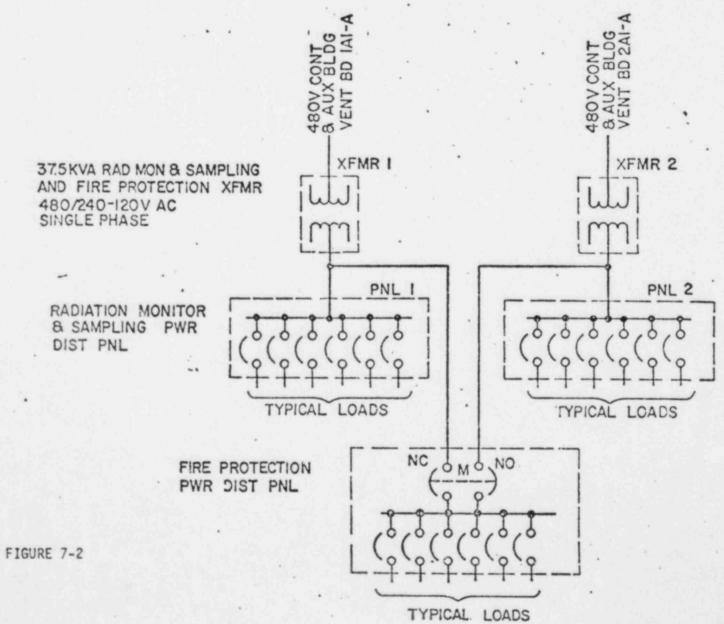


TABLE 7-1

Component	Building	Elevation	Column	Room Name
Central processor unit and CRT display	Control	732.0	p,C7	Main control room
Line printar	Control	685.0	p,C10	U2 aux. inst. room
Local control panels		Located thr	oughout plant	
Power distribution panel	Auxiliary	734.0	t,A8	6.9 kV shutdown hoard room B
480V cont. and aux. bldg. vent board 1A1-A	Auxiliary	734.0	t,A3	480V shutdown board room 1A2-A
Transformer 1	Auxiliary	734.0	u,A2	480V shutdown board room 1A1-A
480V cont. and aux. bldg. vent board 2A1-A	Auxiliary	734.0	r,A13	480V shutdown board room 2A2-A
Transformer 2	Auxiliary	734,0	r,A15	480V shutdown board room 2A1-A

8. Item E.2.c., Fire Protection Water Supply System - In Section E.2.c you state that the fire pumps at the Sequoyah Nuclear Plant are electric motor driven and are connectable to the emergency diesel generators. Confirm that these pump motors will be connected automatically to the IE bus, upon loss of offsite power. The required alarms and status are annunciated in the main control room. It is not clear that the pump monitoring system meets the guidelines of BTP 9.5-1, Appendix A. Therefore, verify that the fire pumps are individually monitored and the monitoring circuits are electrically supervised. Alarms indicating pump running, driver availability, or failure to start, should be provided in the control room.

TVA Response

The electric motor-driven fire pump motors are powered by the 480V shutdown boards. Upon loss of offsite power, these boards are automatically loaded on the diesels. Two minutes after the power loss, the fire pumps are in turn loaded on the 480V shutdown boards.

Supervised alarm circuits will be provided for loss of line power and motor running condition for the fire pumps and will alarm and annunciate in the MCR.

The fire pumps are not designed or installed in accordance with NFPA 20. The pumps are vertical, submersible, turbine-type, electric motor-driven units that meet ASME Section III and Siesmic Category I requirements.

9. Item E.3, Water Sprinklers and Hose S'andpipe Systems

- A. Item (a). You state that the fire protection system or plant equipment will be so designed such that a pipe break or a single inadvertent actuation of the fire protection will not prevent the functioning of both trains of the safety-related system. This design arrangement is unacceptable. It is our position that the safety related systems or equipment should be protected against moderate energy line cracks in accordance with BTP APCSB 3-1, by water shields or baffles.
- B. Item (d). Verify that the hose station will be able to reach any locations that contain or present a fire hazard to safety related equipment with at least one hose not over 100' long.
- C. Your submittal does not indicate the hourly fire rating of the protected openings in the stairwell. Indicate their hourly fire ratings.
- D. Throughout your fire hazards analysis, you state that sprinkler systems will be installed in various areas of the plant. We observed during our site visit that the sprinkler systems were installed at the ceiling level. However, no provisions were made to locate sprinkler heads clear of overhead obstructions, especially in areas housing the auxiliary feedwater pumps and the component cooling water pumps. It is our position that where such systems are to be installed that additional sprinkler heads be provided below any obstructions to obtain minimum interference to dishcarge patterns of the sprinkler heads on the floor below.

TVA Response

The Sequoyah fire protection systems in safety-related areas are seismically qualified, preaction sprinkler systems. They are charged with water only when cross-zoned detectors (smoke and smoke; smoke and thermal) are actuated. Due to the inherent tendency of smoke detectors to drift toward their alarm setpoint with time, cross-zoning provides an additional margin of safety against spurious application of water to safety-related equipment. In addition, low pressure air superision of the sprinkler system is provided in areas containing sensitive electrical equipment. If system integrity is not maintained, the supervision air pressure is lost and annunciation is provided in the MCR. Water shields are also provided in areas where actuation of the suppression systems could unacceptably impair safety-related equipment. This design philosophy complies fully with BTP APCSB 3-1. Sections B.1 and B.3a which require protection of essential systems and components against postulated piping failures in high or moderate energey fluid systems that operate during normal plant conditions.

In general, the cross-zoning technique utilizes two detectors in the same area that a single detector would normally occupy if located in accordance with UL spacing guidelines. Based on this detection zone overlap, TVA is satisfied that preaction valve actuation will be accomplished prior to the fusing of any sprinkler heads.

- B. All areas of safety-related structures are within reach of fire hose stations equipped with 100' of hose.
- C. The protected stairwells in the contro building have equivalent 1-1/2 hour rated reinforced concrete and concrete block construction. The plaster partition assemblies above the fire doors have a fire resistive rating at least equivalent to that assigned the wall construction.

Fire barrier seals around pipe penetrations in the stairwells are in accordance with the designs discussed in 3.B. There are no cable tray or ducts penetrating the stairwells.

D. Additional sprinkler heads shall be provided or existing heads relocated in order to clear overhead obstructions and obtain minimum interference patterns where possible. 10. Safety related pumps of both trains for both Unit 1 and Unit 2 are contained in the Auxiliary Building elevation 653' and 660' area. Each train is in its own room; however, no fire rated door separates the room from the corridor and adjacent pump rooms. It is our position that each room be provided with a 3-hr. fire rated door, mounted in an approved fire rated frame to properly protect the room. In lieu of fire rated doors, provide a wet pipe sprinkler system to completely cover the corridor separating Unit No. 1 from Unit No. 2. The sprinkler system should alarm and annunciate in the control room.

TVA Response

Three-hour fire doors are provided for each of the eight openings from safety-related pump rooms. At the time of the NRC site visit, these doors had not been installed.

11. On elevation 690' of the auxiliary building at Al and U, all four power cables (both trains of both units) of the ERCW pump from the yard pump house come into a metal enclosure mounted on the concrete wall approximately 10 ft. above the floor. Each cable within the junction box is separated by a metal baffle. From the enclosure, the cables are run in conduits and go up the wall and through the ceiling. We were informed that at the ceiling, all the conduits are supposed to be buried in concrete back to the switchgear room of the various trains and units.

It is our position that:

- A. Verify that these conduits are actually buried back to their switchgear rooms from the ceiling level above the junction box.
- B. A 3-hr, fire rated barrier be installed around the metal enclosure as well as around the conduits located on the wall above the enclosure and terminating at the ceiling to protect against potential exposure fires. In addition, we are concerned that the metal enclosure and metal baffles are inadequate to prevent an electrically initiated fire that may damage all power cablings in the enclosure. Revise your design of the metal enclosure and metal baffles to protect the cables such that an electrically initiated fire will cause damage to no more than one power train.

TVA Response

- A. The conduits are not buried back to their switchgear rooms from the ceiling level above the junction box. The conduits ascend from the junction box to elevation 734.0 embedded only as they penetrate floor slabs. On elevation 734.0 the conduits terminate in cable trays that extend to the switchgear.
- B. In lieu of the 3-hour fire rated barriers, TVA will provide a 1" mineral wool barrier between the redundant power cables in the junction box as protection against an electrically initiated fire. The outside of the junction box and the four redundant power conduits routed between elevation 690' and 734' will be protected by 1-1/2-hour fire rated barriers utilizing a UL-approved configuration.

As indicated in the response to position 13.C, TVA will provide sprinkler coverage for the area around the component cooling water pumps and the ERCW pump cable junction box.

12. During our site visit we noticed numerous places where redundant safety related cable trays as well as conduits were in close proximity to each other. This was noticed on almost all elevations. Some of these locations are to have flamemastic and preaction sprinkler systems installed at the interaction. At the time of the site visit the function of these various cables-conduit could not be determined at these interactions.

It is our positon that:

- A. Identify all such interactions in the areas of both Units 1 and 2 where the redundant safety related trains are within 20 ft. of each other. Also, the consequence of electrically initiated or exposure fires should be evaluated with regard to plant shutdown capability (see item 1).
- B. For those areas indicated in item (A) above, where a fire can affect the plant shutdown capability, an area automatic sprinkler system should be provided to afford protection against exposure fires. Also, a 1/2-hr. fire rated barrier such as 1" of mineral wool should be provided to separate one safety related train from the other or from a common exposure fire source. The sprinkler system should alarm and annunciate in the control room.

TVA Response

A. The criteria for the separation of Class IE equipment and circuits basically meet RG 1.75, revision 0, although it was issued after the Sequoyah design was complete. The criteria used in the design for the separation of redundant cable trays at Sequoyah in general plant areas are as follows. Redundant cable trays are separated a minimum of 3 feet horizontally, and a minimum of 5 feet vertically, except where trays containing cables of different divisions of separation cross. Where redundant cable trays cross, there is a minimum vertical separation of 12 inches (tray top of lower tray to tray bottom of upper tray) with the bottom tray covered with a solid steel cover and the top tray provided with a solid steel bottom for minimum distance of 3 feet on each side of the tray crossing.

In the auxiliary building, each cable tray tier may contain a combination of nondivisional trays together with trays of only one division. As a result of the reevaluation of the Sequoyah fire protection program, it was determined that in most fire cells, containing redundant division of systems, the installed combustibles consisted of cable insulation and jacket materials. New criteria were developed to identify and protect redundant circuits, whether installed in conduits and/or cable trays within a 5-foot radius of the point of interaction. This distance was established as the most credible zone of influence for an electrically initiated fire.

Following this 5-foot criterion, approximately 50 percent of the cable trays in the auxiliary building were identified as needing protection. The areas of divisional interactions are shown as hatched cable trays in figures 12-1 through 12-5. The hatched trays represent both tray-to-tray and tray-to-conduit divisional interactions. In each reactor building annulus there are 15 divisional interactions, in the cable spreading room there are 44 divisional interactions, and in each auxiliary instrument room there are 4 divisional interactions.

Following a 20-foot criterion, between 75 and 80 percent of the trays will be involved in divisional interactions within the reactor building annulus, the auxiliary building, the cable spreading room, and the auxiliary instrument room. For example, in units 1 and 2 areas of the auxiliary building, the divisional interactions of redundant safety-related trains that are within 20 feet of each other are shown shaded in figures 12-6 through 12-10.

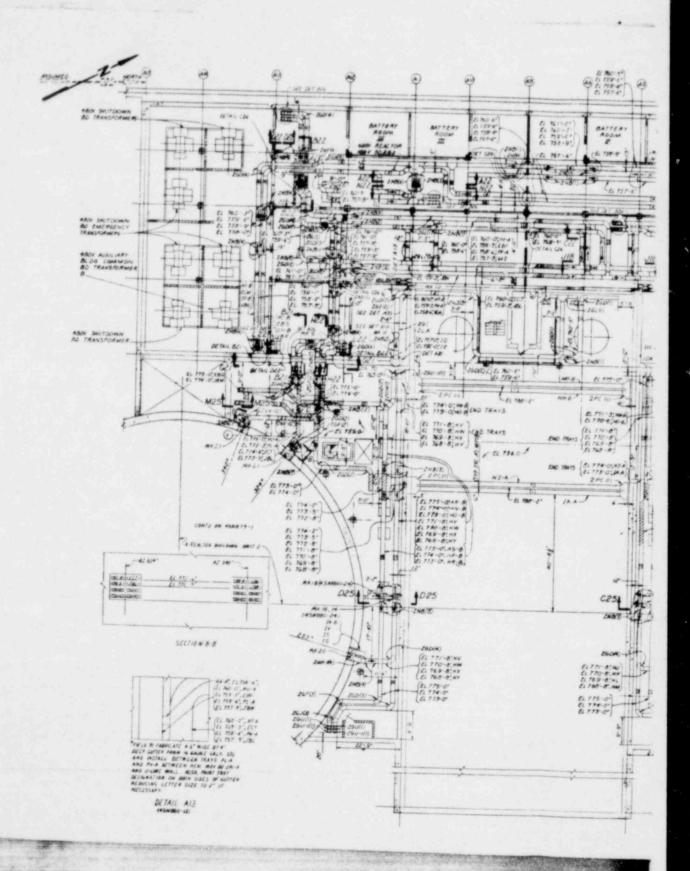
The present design requires that the exposed surfaces of cables in the identified trays (both divisional and nondivisional) be coated with a flame-retardant material such as Flamemastic 77 for a 5-foot radius from the post of interaction (or to the nearest wall, floor, or ceiling). In addition, fixed suppression systems are provided for these interactions.

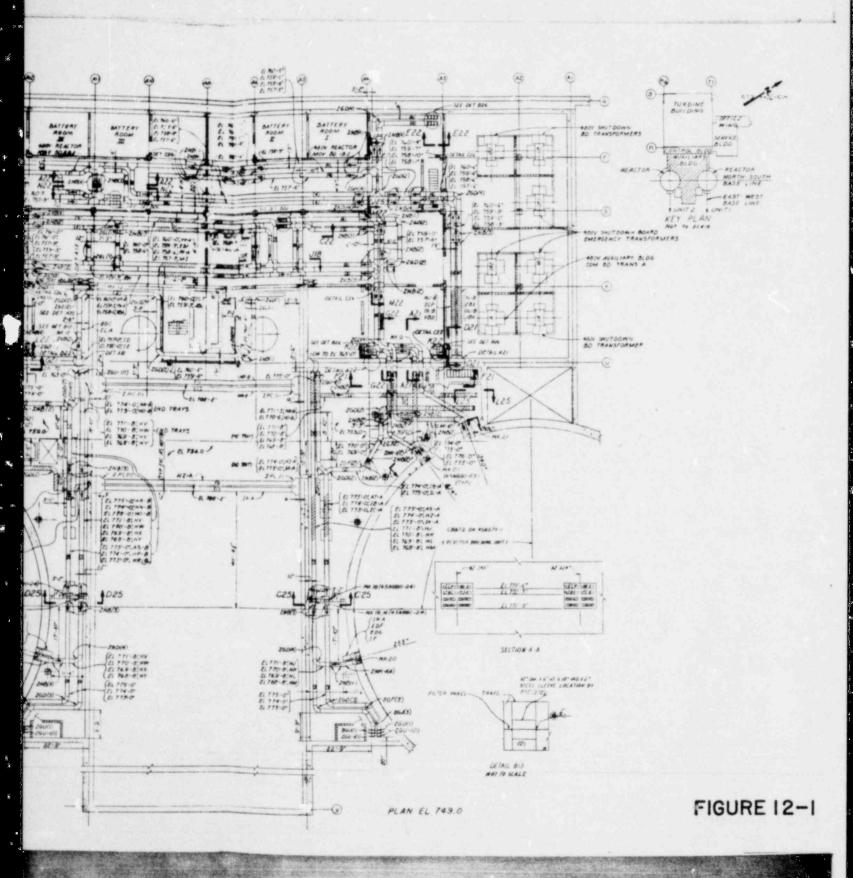
TVA has evaluated the consequences of fires with regard to plant shutdown capability. Electrically initiated fires are judged to be acceptable based on the results of tests conducted at Sandia Laboratories and the commitment to add a fire-retardant coating to cabies as discussed in the response to question 4. The tests demonstrate that a fire initiated in a shorted cable will not propagate to cables in adjacent trays and that cable coatings are effective in restricting fire propagation. The consequences of exposure fires are discussed in the response to question 1.

B. TVA has provided automatic sprinkler systems for the protection of redundant circuits at interaction points based on the 5-foot criterion. Automatic sprinkler coverage is also provided for areas containing fixed combustibles which could impose an exposure fire threat to equipment, components, or circuits necessary to achieve safe plant shutdown. As indicated in the response to question 9.D, additional sprinkler heads shall be provided or existing heads relocated in order to clear overhead obstructions and obtain minimum interference patterns where possible, and additional suppression systems will be provided as described in the responses to questions 1 and 13.

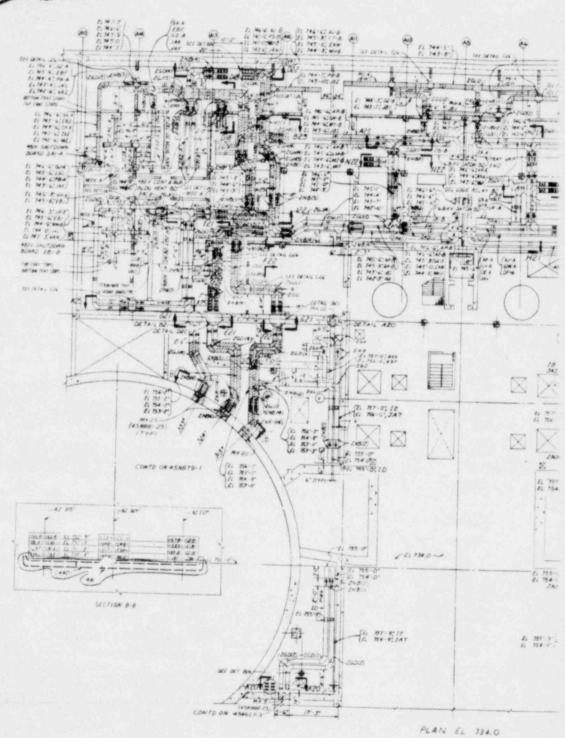
TVA's present design philosophy provides for the alarm and annunciation in the main control room of the operation of all fixed suppression systems.

See the response to question 1 for a discussion of the measures proposed for protection of redundant safety-related circuits required for safe shutdown.









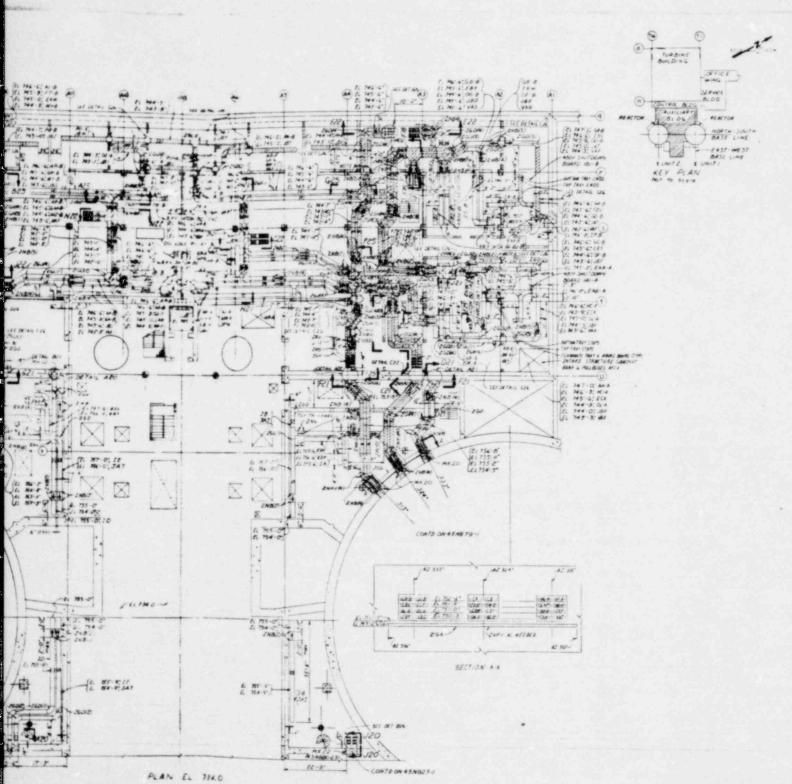
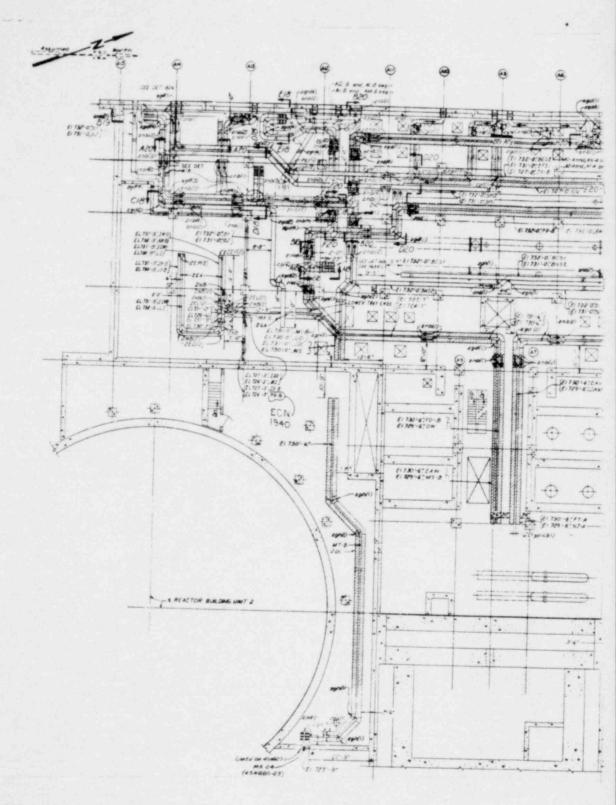
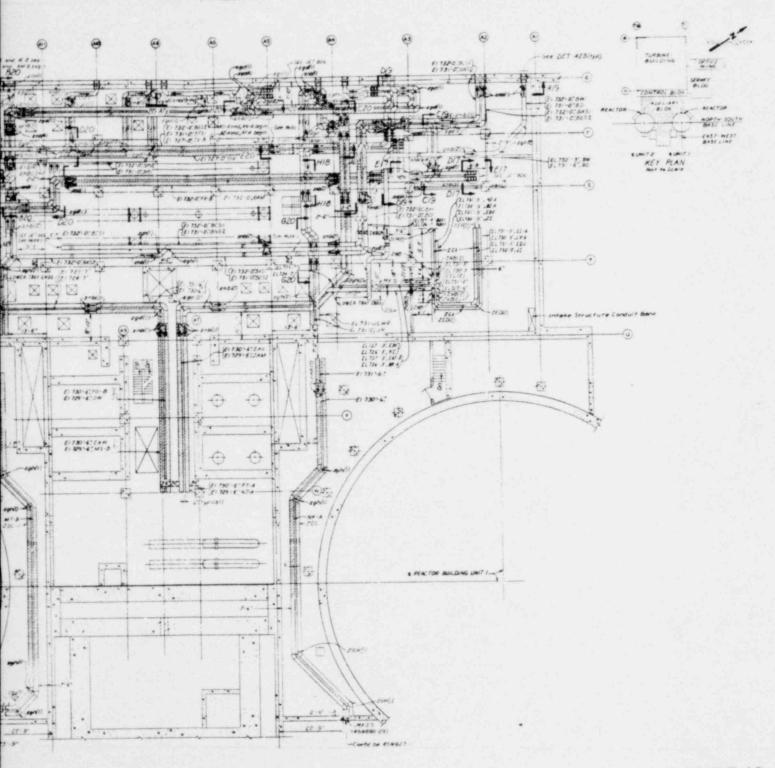


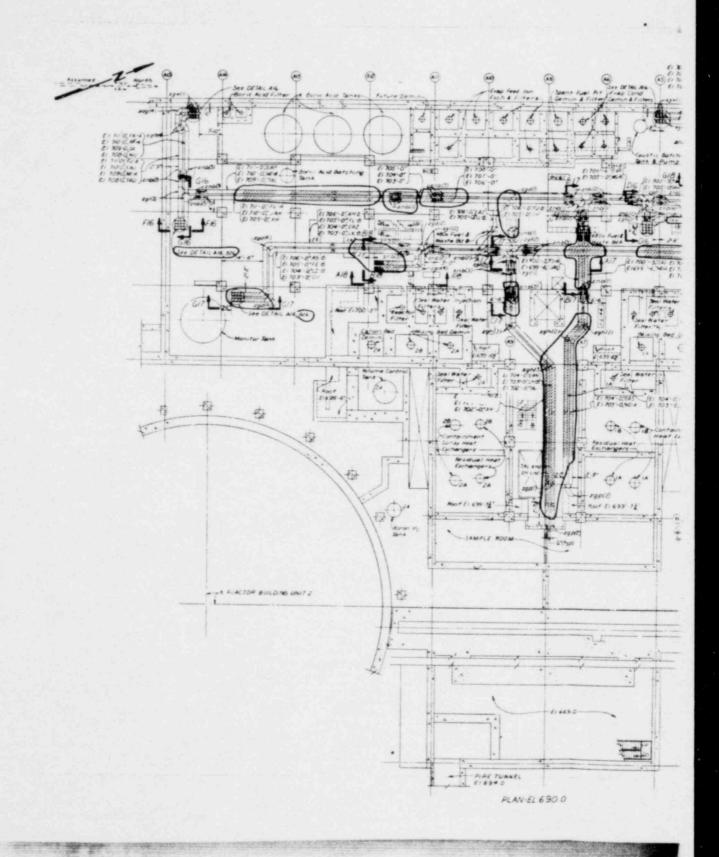
FIGURE 12-2



PLAN EL 714 0



PLAN EL 71+ 0



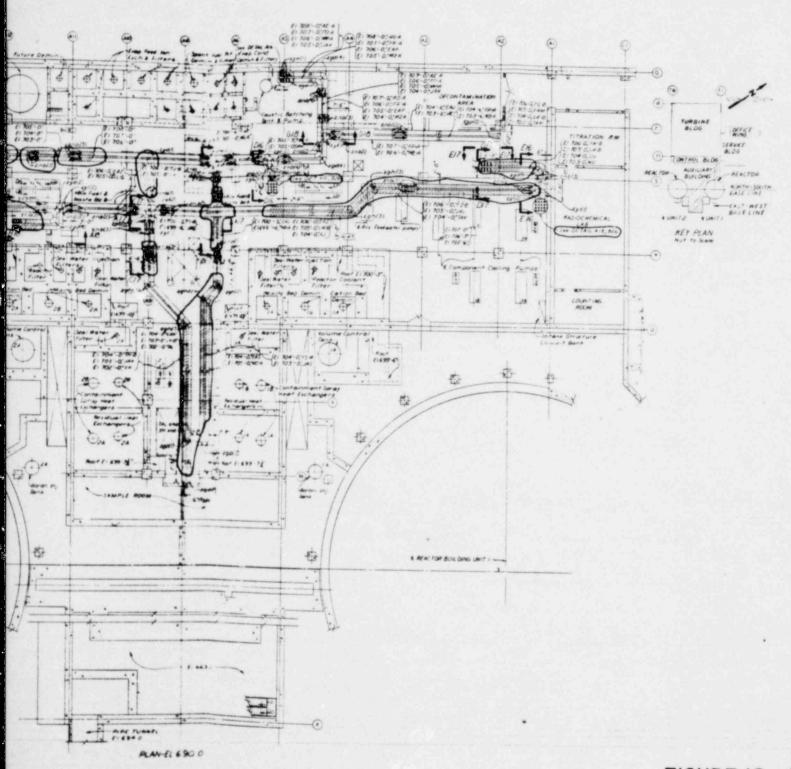
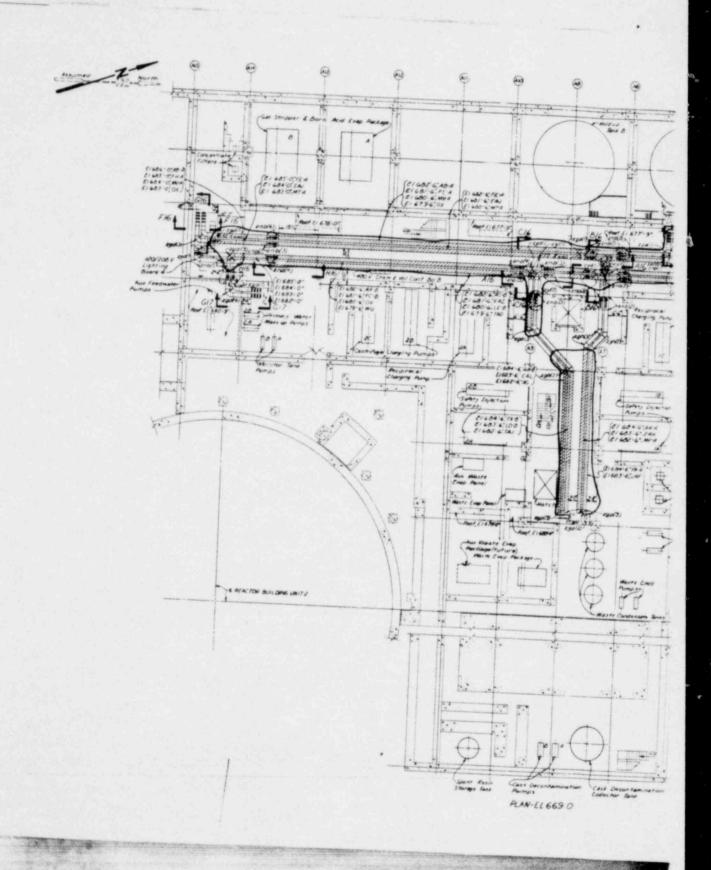


FIGURE 12-4



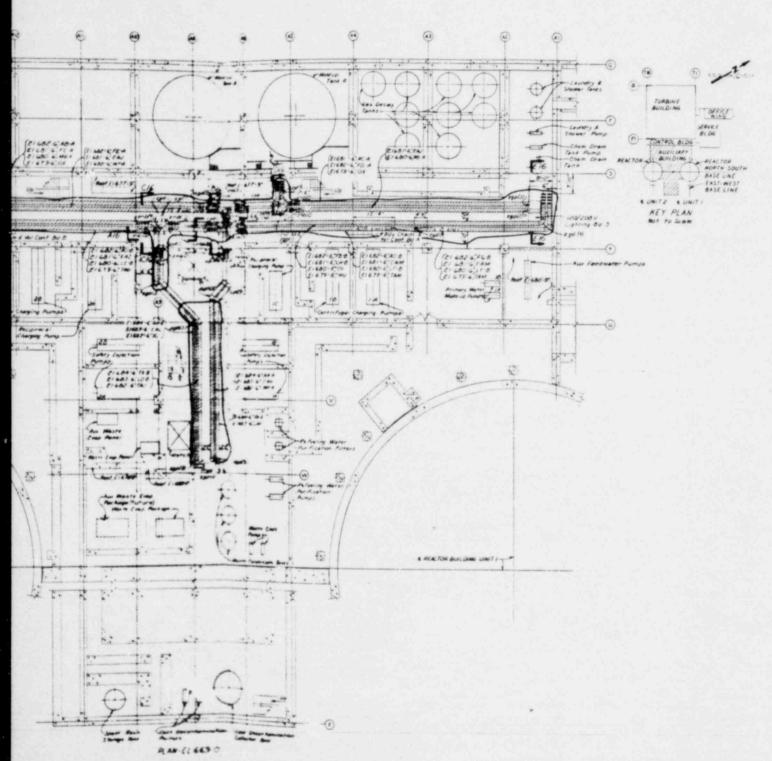
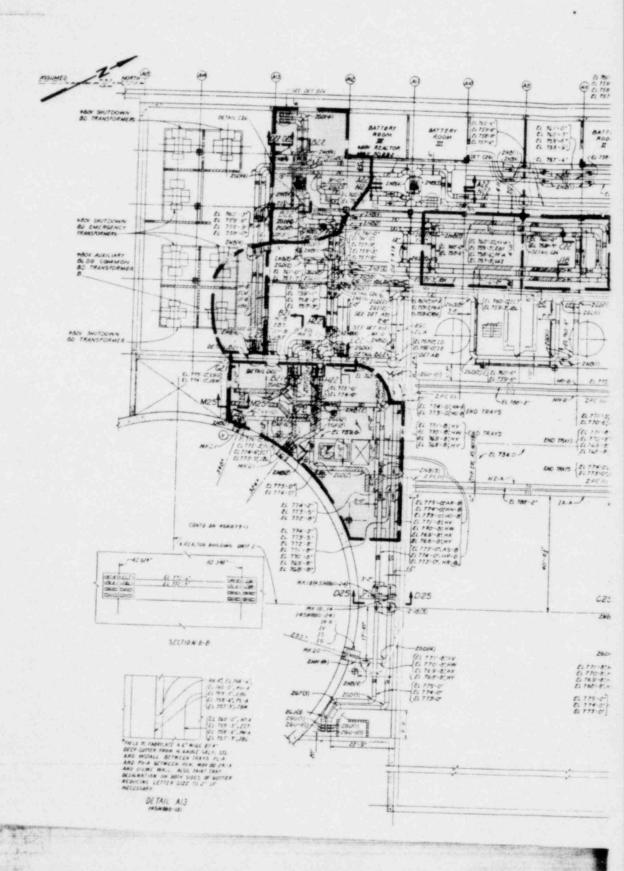
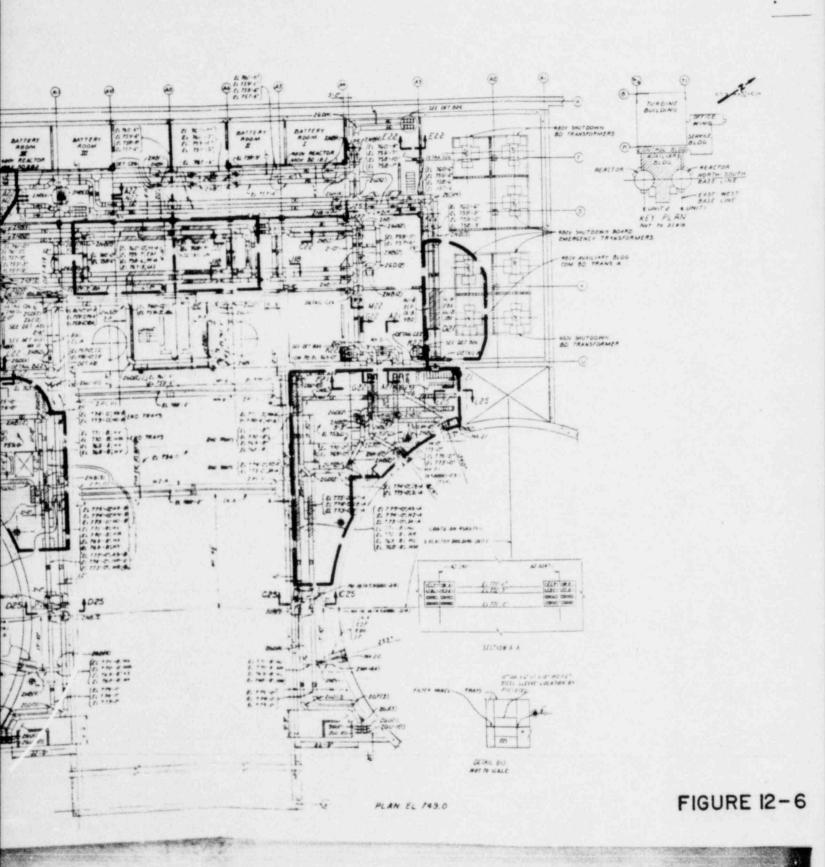
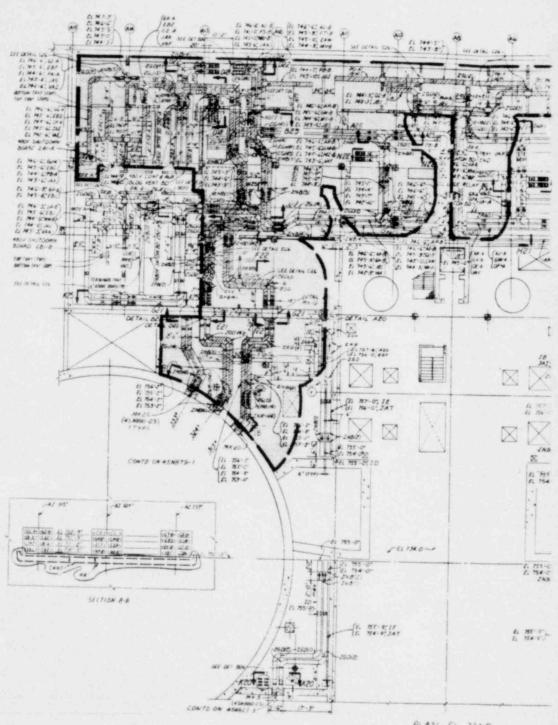


FIGURE 12-5









PLAN EL 734.0

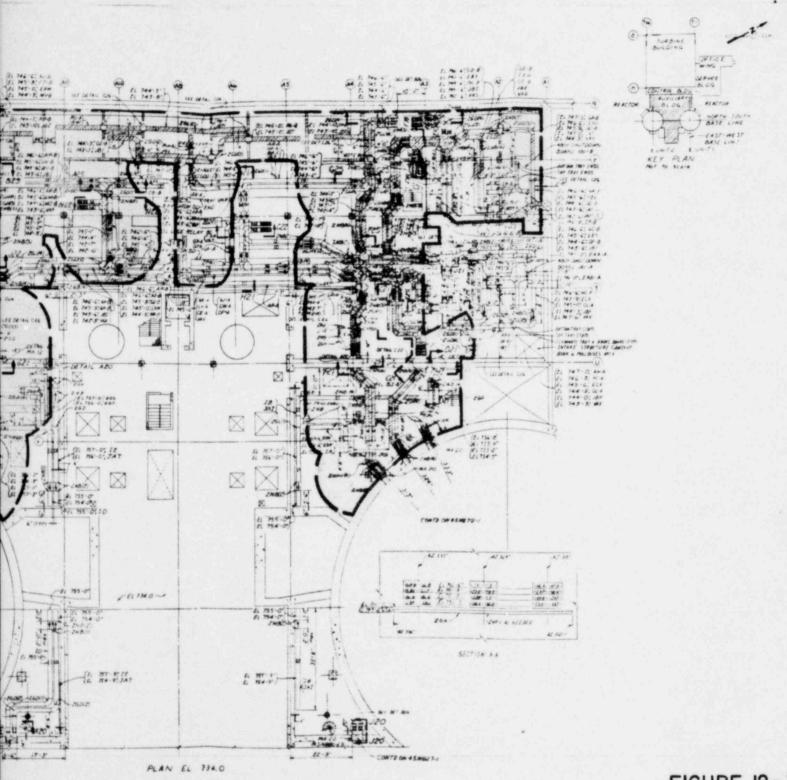
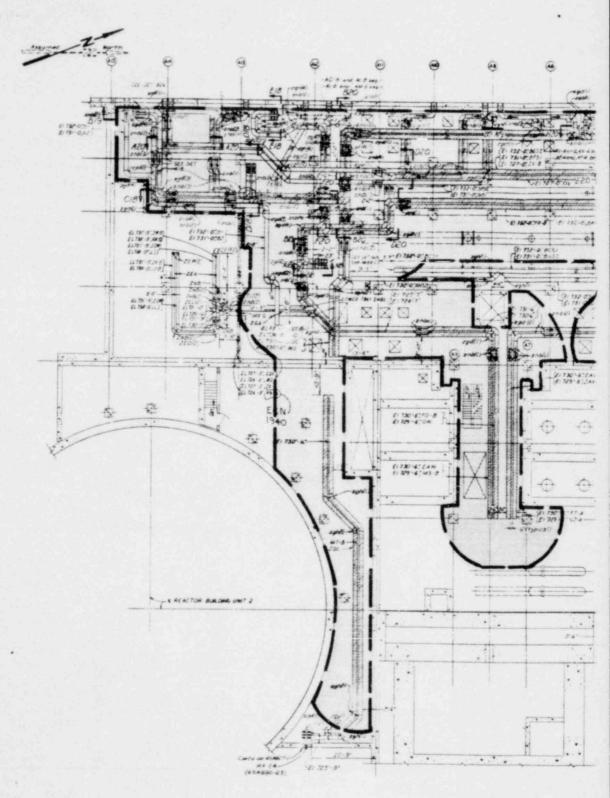
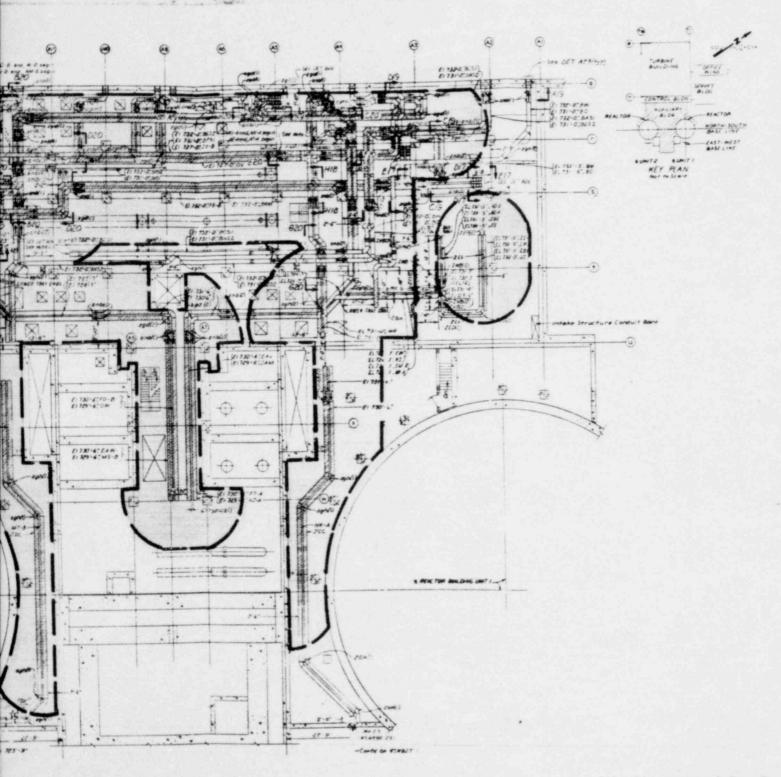


FIGURE 12-7

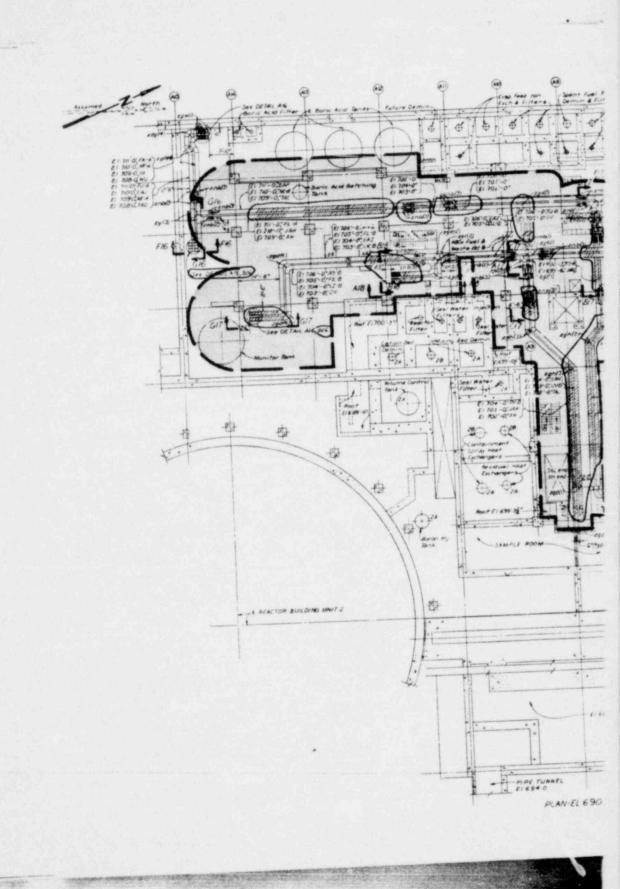


PLAN EL 714 O



PLAN EL 71+ 0

FIGURE 12-8



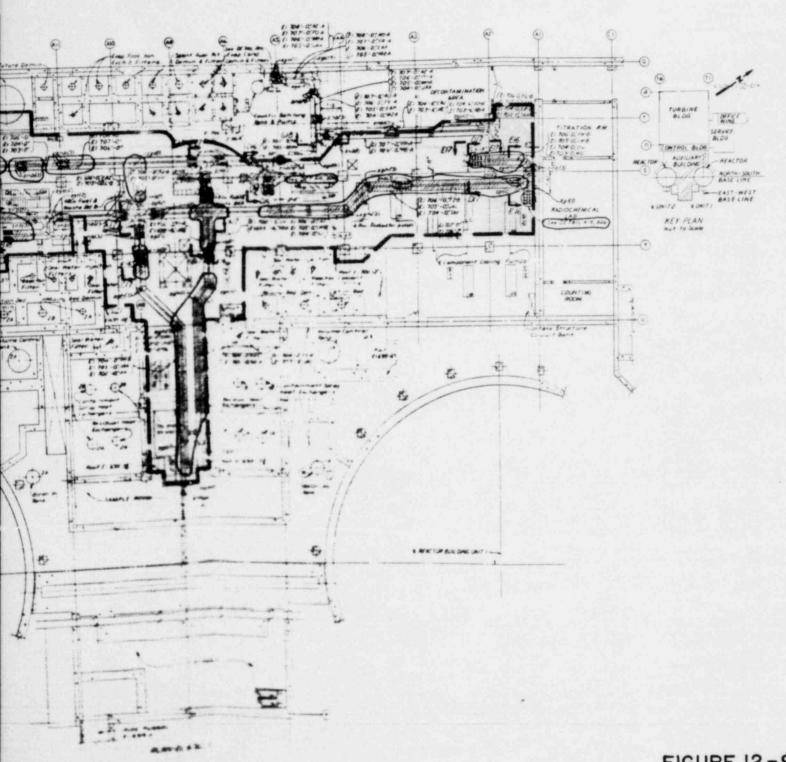
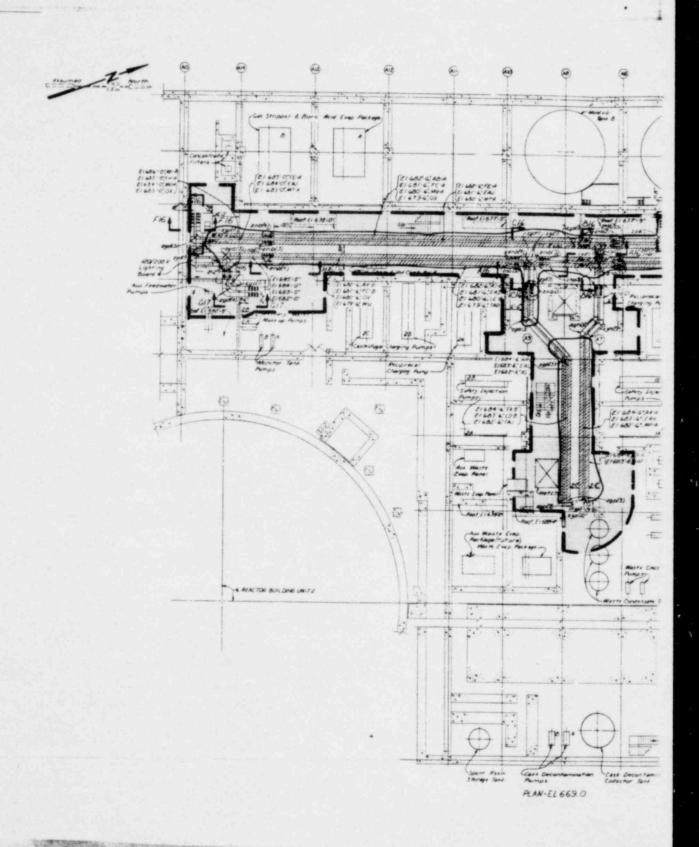


FIGURE 12-9



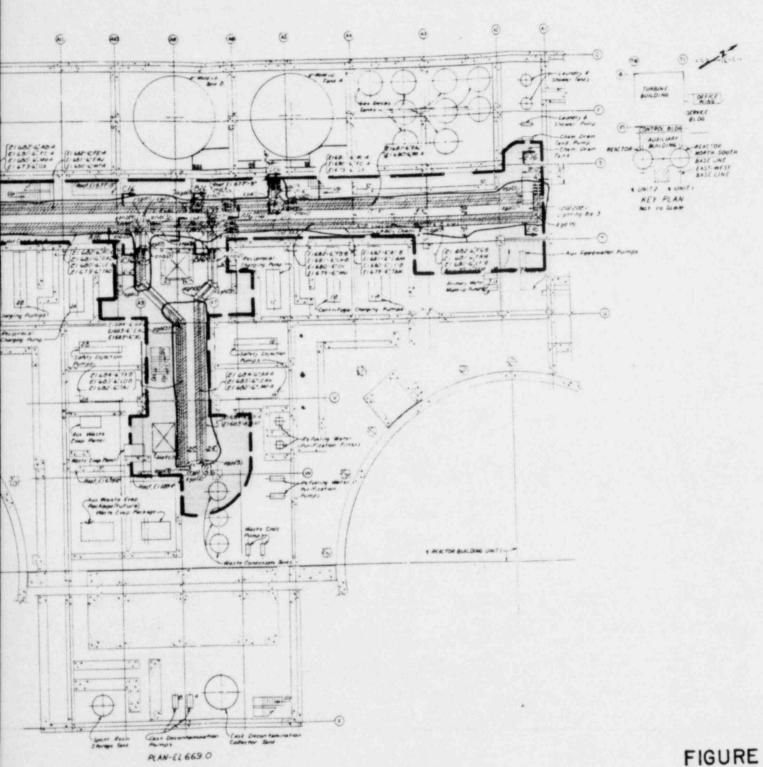


FIGURE 12-10

13. On elevation 690' of the auxiliary building at coordinate A-3 and T, all five (two from each unit and one swing) component cooling water pumps are located together. Adjacent to these safety related pumps are the two motor driven auxiliary feedwater pumps (both trains), of Unit 1, which are also safety related. Both Unit No. 2 auxiliary feedwater pumps are located approximately 125' away down the corridor at coordinates A-12 and S. Power operated control valves for the component cooling water (CCW) pumps are located immediately above the CCW pumps on an open grating mezzanine. Various safety related cable trays are also located in the area. A preaction sprinkler system is proposed for the ceiling level only and would offer very little protection against an exposure fire due to the many obstructions between the ceiling level sprinkler and the floor below.

It is our position that:

- A. A half hour fire rated barrier be provided between the redundant auxiliary feedwater pumps and extend up to the mezzanine above these pumps. At present, a metal decking barrier is used to partially separate each auxiliary feedwater pumps. This applies to both Unit 1 and 2 pumps.
- B. Provide automatic sprinkler protection under the partition above the auxiliary feedwater pumps of both Unit 1 and 2. Activation of the system should alarm and annunciate in the control room.
- C. Provide automatic sprinklers over all five component cooling water pumps under the mezzanine above them.
- D. Provide a 1/2-hr. fire rated barrier separating each component cooling water pump from each other. The barrier should extend to the underside of the mezzanine above. Also provide a 1/2-hr fire rated barrier for the mezzanine floor above these pumps. The 1/2-hr. fire rating should protect against a fire from either side of the barrier.
- E. Provide a 1/2-hr. fire rated barrier protection (1" mineral wool or equivalent) for the control and power supplies to the various valves on the mezzanine level above the component cooling water pumps.
- F. Provide additional smoke detection throughout the area for early detection. Detection should be tied into the existing fire alarm system and alarm and annunciate in the control room.
- G. Verify that the existing hose station location will be sufficient with the above fire rated barriers in place for protection of all pumps and valves.

TVA Response

- A. The auxiliary feedwater system contains two motor-driven pumps (those described in the above question) and a steam turbine-driven pump (located on elevation 669). Since any one of these pumps has sufficient capacity to establish and maintain a safe shutdown, the loss of both motor-driven pumps to a fire is an acceptable event. Hence, fire rated barriers between pumps are not required. See discussion of steam generator inventory control in response to question 1.
- B. Automatic sprinkler protection will be provided under the pipe break barrier for the units 1 and 2 motor-driven auxiliary feedwater pumps.
- C. Automatic sprinkler coverage will be provided under the mezzanine for all five component cooling water pumps. Sprinkler heads will be a fast-response type and tested according to UL 199. Heat collectors will be provided for each sprinkler head. Sufficient heads will be provided to cover the entire general area at the mezzanine level with the maximum distance between heads of eight feet.
- D. A single fire barrier will be provided between train A and train B component cooling water pumps. The fire barrier will extend approximately three feet above the highest point on the pumps and have a minimum 1/2-hour fire resistance rating.
- E. Control and power supply cables that are required for safe shutdown and that are located on the mezzanine level above the component cooling water pumps will be protected as discussed in the response to question 1.
- F. Additional smoke detection will be provided to actuate the proposed sprinkler systems and to ensure early warning of a fire. Detection circuits will be Class A supervised in accordance with NFPA 72D.
- G. Existing fire hose capability is sufficient to reach all equipment within the area of the component cooling water pumps and motor-driven auxiliary feedwater pumps with no more than 100 feet of hose.

- 14. The emergency raw cooling water pump house is separated into three compartments with train A of both units located on either end and train B of both units located together in the middle compartment. It is our position that the following be provided for the ERCW pump house.
 - A. Provide a 3 hr. fire rated door to separate the center compartment from the south compartment. The door should be alarmed and annunciated in the control room.
 - B. Provide a 1/2-hr. fire rated partial barrier to separate the two B trains in the center compartment. Barriers should be at least 6" high.

TVA Response

A. A 3-hour rated fire door is provided between the center and south compartments of the intake pumping station containing the ERCW pumps. At the time of the NRC site visit, the door had not been installed.

The door shall be locked in its normally closed position with the keys administratively controlled. Therefore, alarm and annunciation of the door is not necessary.

B. It is TVA's position that the present compartmentation in the CCW intake pumping station is adequate based on the following discussion.

The NRC's understanding of the ERCW system appears to be incomplete. Sequoyah's ERCW system is a two-train, nonunitized system. Each of the two trains contains four 50-percent capacity pumps in the CCW intake pumping station and four 50-percent capacity pumps in the ERCW pumping station. Figure 14.1 is a single-line drawing of the two supply headers and the pumping stations. Note that in each pumping station, all pumps of a given train feed a common header. For distribution purposes, two headers do branch off of each common header, both of these are required for operation of either unit (with single failure capability) as each serves not only unit loads but also essential common plant loads.

For unit one operation, all ERCW loads will be supplied by four pumps located at the CCW intake pumping station. The other four pumps at this station will never be used. When construction of the new ERCW pumping station is completed, some time before unit two operation, all ERCW pumps at the CCW intake pumping station will be abandoned. See Figures 14.1 and 14.2 to identify which pumps will be in service and to which diesel they may be loaded. Figure 14.3 depicts the pump and header arrangement for the new ERCW pumping station.

Sequoyah's two-train, nonunitized system is more fully described in Section 9.2.2 of the FSAR (see Figures 9.2-11, 9.2-15a, 9.2-20, and 9.2-20a). It has been reviewed and found to be acceptable by the NRC's APCSB Branch.

Additionally, the two required B train pumps in the central compartment of the CCW intake pumping station are located approximately 30 feet apart. This special separation precludes the need for any barrier.

Thermal spot detectors and heat collectors will be provided immediately above each ERCW pump in both the CCW intake pumping station and the ERCW pumping station to provide early warning fire detection capability.

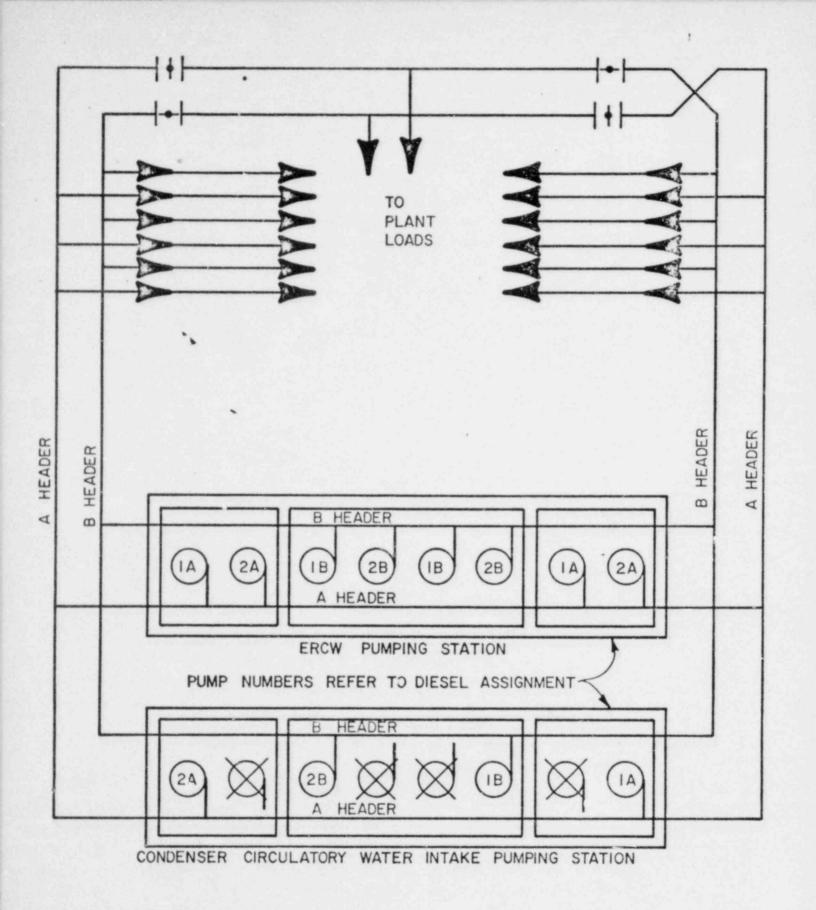
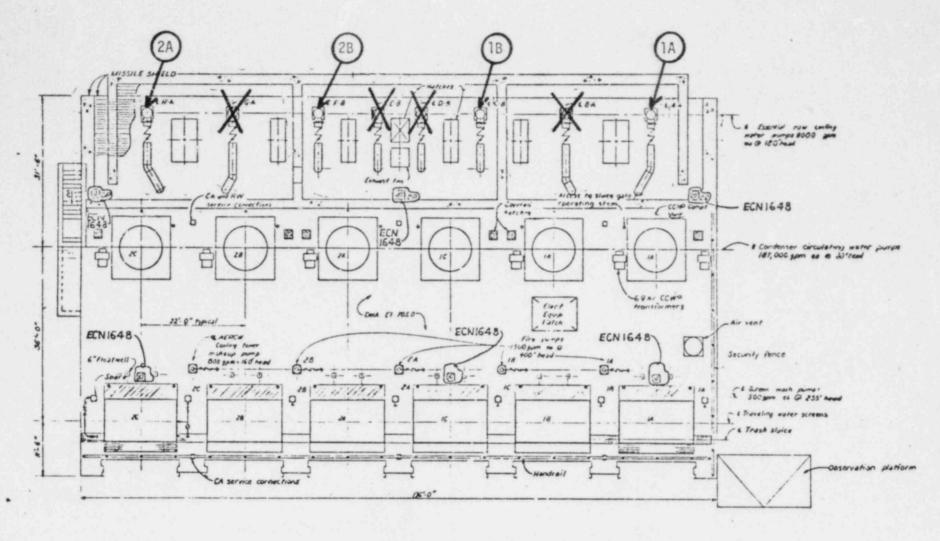


FIGURE 14.1

ERCW SUPPLY
HEADER ARRANGEMENT
SEQUOYAH NUCLEAR PLANT
TENNESSEE VALLEY AUTHORITY

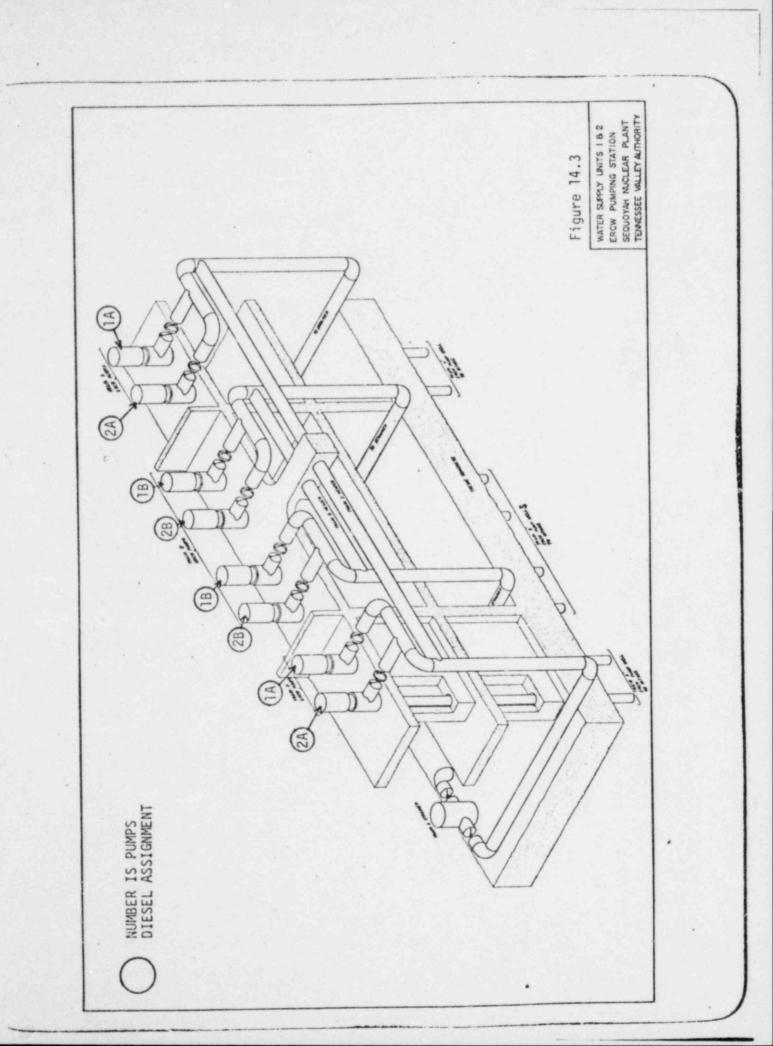


These pumps are not and will not ever be wired up.

These pumps will be disconnected prior to startup of unit 2. Number in circle is diesel pump is assigned to.

Figure 14.2

Condenser Circulating Water Intake Pumping Station Sequoyah Nuclear Plant



15. All four wood and PVC cooling towers for the Auxiliary Essential Raw Cooling Water System are located within 50 ft. of the emergency diesel generator building and approximately within 50 ft. from the two large diesel fuel oil storage tanks (also located approximately within 50 ft. from the emergency diesel generator building and approximately 50 ft. from the AERCW pumps). These cooling towers are not protected by a deluge system. We are concerned that a fire in the cooling towers can threaten the diesel generator building, the diesel storage tanks, and the auxiliary essential raw cooling water pumps. It is our position that the cooling towers be protected in accordance with Section D.18 of Appendix A, i.e., providing deluge system, hydrants, and hose stations.

TVA Response

TVA is not providing a deluge system or hose stations for the four auxiliary essential raw cooling water (AERCW) cooling towers for the following reasons:

- A. The AERCW system (pumps and cooling towers) is required to shut down the plant only upon loss of Chicamauga Dam (the downstream dam). The safety feature will be transferred to the new ERCW station when it is completed (prior to unit 2 operation).
- B. The diesel genrator building is about 50 feet from the closest tower (the distances of the other towers are 120, 200, and 280 feet). This distance is great enough so that an AERCW cooling tower fire would not constitute a hazard to this structure. The diesel generator building is a seismic 1A structure, designed to be tornado and missile resistant and its exterior walls are equivalent to at least a 3-hour rated fire barrier.
- C. The yard storage fuel oil tanks are 70 feet away from the closest cooling tower (distances to remaining towers are 75, 120, and 180 feet). This separation distance is sufficient such that an AERCW cooling tower fire would not constitute an exposure hazard to these tanks (see table 4-4, NFPA 30). The fuel oil tanks are diked and yard hyurant and hose/equipment capabilities are provided for the entire area. Further, the yard fuel oil tanks serve no safety function. The safety-related diesel seven-day tanks are embedded in concrete under the diesel generator building.
- D. Salient features of the cooling tower design are as follows:
 - The use of fire retardant, corrugated fiberglass casing and louvers.
 - b. Fire retardant glass reinforced polyester fan cylinder.
 - c. PVC fill and eliminators with a flame spread rating of 25 or less.

16. It is our position that when the CO₂ total flooding system is locked out locally in any emergency diesel generator room that the operator in the control room receives an alarm and annunciator indicating that the system is inoperative.

TVA Response

A common MCR alarm and annunciation will be provided for the train A Emergency Diesel Generator Room and 480V Board Room $\rm CO_2$ systems to indicate when any system is locked out locally. Identical alarm and annunciation capability will be provided for the train B Emergency Diesel Generator Room and 480V Board Room $\rm CO_2$ systems.

17. A. The corridor outside each diesel generator room of the emergency diesel generator building has a preaction sprinkler system. Power conduits from each diesel run up the west wall of the corridor. A concrete barrier extending out approximately 3 ft. from the west wall separates the redundant power trains. Unit No. 1 power conduit is located at one end of the corridor and Unit No. 2 at the opposite end. It is our position that a 1-1/2 hr. fire rated barrier separate each redundant train of each unit from each other in the corridor for protection against an exposure fire in the event of failure of the sprinkler system.

It is also our position that the doors leading to each emergency diesel generator from the corridor be kept in the closed position (at all times) and alarmed and annunciated in the control room.

Also verify that a fire in any one of the four switchgear rooms above the corridor of the diesel generator building, elevation 740 ft., will not involve cables and/or conduit for any other safety related train or unit.

TVA Response

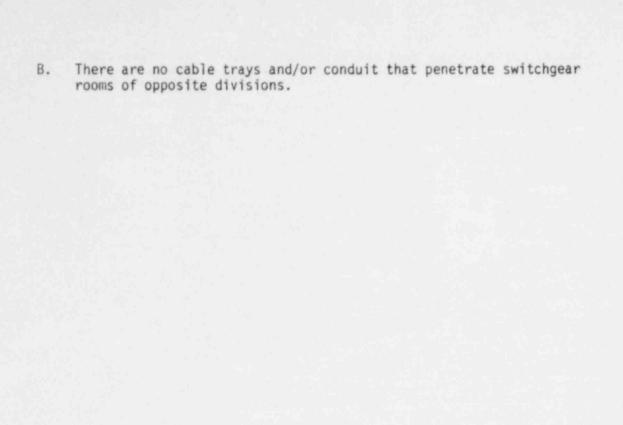
A. The NRC understanding of the conduit assignment is in error. Unit 1 and unit 2 train A power conduits are located on the north end of the corridor, and unit 1 and unit 2 train B conduits are located on the south end of the corridor. There is approximately 50 feet separation between train A and train B conduits. TVA considers the spacial separation to be adequate for fixed and transient fire hazards located in the area.

Lubricating oil with a flash point of 465° F will be transported between the lube oil storage room and the diesel generator rooms in 55-gallon drums. If the contents of one or more drums were spilled in the corridor, the oil would run to the center of the corridor and out of the building through a 24-inch drain line. In the unlikely event that this oil were to ignite, the fire could affect the conduits of one train only, approaching the conduits of the second train by no closer than 25 feet.

A flammable liquid fire in the lube oil storage room, fuel oil transfer pump room, or any diesel generator room would present minimum danger to the conduits since each room is provided with a carbon dioxide suppression system, 3-hour fire rated compartmentation, floor drains, and curbs across the doors opening into the corridor. The hazard from the fuel oil transfer pump room is further minimized by the transfer pump's local control station which must be manned continuously when the pump is in service.

Normally closed, 3-hour rated fire doors will be provided for the opening leading to each emergency diesel generator room from the corridor. The sliding fire doors presently installed will be removed.

It is TVA's position that the fire doors require no supervision.



18. We were informed at the time of the site visit that an alternative means of achieving cold shutdown if both redundant trains of conduit-cable trays (of both units) are lost due to a fire in the control room, or cable spreading room or remote shutdown panel room. In order to evaluate this alternative, we require a description of how the alternate shutdown method for each area will be carried out, system modifications associated with the shutdown method, and confirmation that written procedures have been established for immediate use by responsible individuals. The staff position with respect to providing alternate or dedicated shutdown methods for fire protection is stated in Enclosure 1. Provide information that demonstrates that the requirements of Enclosure 1 will be satisfied.

TVA Response

Emergency Operating Instruction EOI-7, Control Room Inaccessibility, provides for safe plant shutdown from the auxiliary control room should the main control room become inaccessible due to a fire (or for other reasons such as toxic gas, etc.) in either it, the spreading room, or Auxiliary Instrument Room. This instruction provides a discussion of symptoms, automatic actions, immediate operator action, subsequent operator action, and recovery for: (a) control room inaccessibility at power or hot standby; (b) control room inaccessibility at hot shutdown, cold shutdown, or refueling shutdown; (c) hot standby to cold shutdown in the auxiliary control mode; and (d) return to main control room operation from test of EOI-7. EOI-7 and all EOI's have been submitted to NRC Region 2 Office of Inspection and Enforcement for review.

The auxiliary control room has been divided into five independent compartments (a central control area and four transfer switch rooms) which are separated fro each other by 1-1/2 hour fire rated barriers. The central control area is the only room where a fire could affect both safety trains. Panels and cables in the central area are normally inactive and their loss would have no effect upon plant control. A fire in one of the other four rooms could affect only a single train and would not prevent safe shutdown from the main control room.

TVA will comply fully with all Staff positions in enclosure 1. Compliance with Sections 1.1 through 1.7 will be provided by dedicated shutdown methods or repair procedures for fires located in any area of the plant except the Main Control Room, the Cable Spreading Room, or the Auxiliary Instrument Rooms. Compliance for these areas is provided by alternate shutdown methods and EOI-7. Fire protection equipment and features will be provided that will meet the requirements of Sections 2.1 and 2.2. Interim protective measures required by Section 23 are currently under evaluation by TVA.

19. It is our position that the ventilation system of each safetyrelated battery room be alarmed and annunciated in the control room upon failure of such systems. Confirm that you will meet this position.

TVA Response

Redundant ventilation systems are provided for each safety-related battery room. Failure of one system results in an alarm and annunciation in the main control room and the automatic starting of the second system.

20. Control Room Complex

- A. Provide the flamespread, smoke developed, and fuel contributed test results as per E-84 of the dropped plastic ceiling in the control room. We were informed at the time of the site visit that this ceiling was a UL-approved dropout ceiling. Verify that the ceiling material meets the guidelines of Section C.4.a(4) of Revision 1 to BTP 9.5-1 or replace it with a ceiling material that does.
- B. It is our position that you provide a 3-hour fire rated barrier at T5 and T12 on the ends of the control room. Present doors are not labeled as well as openings are above the suspended ceiling into the corridor. Verify that the doors are of 3-hour fire rated construction and that 3-hour fire doors/dampers are used in all ventilation duct penetrations where they penetrate the 3-hour barrier.
- C. The main safety-related consoles actually extend through the floor three to four feet into the cable spreading room. These are completely enclosed with metal walls and floor. A 3-hour fire rated coating is to be applied to the sides and bottom of these consoles from the cable spreading room side only. There is no fire rating from the control room side. The consoles are congested with cables (all non-IEEE-383 rated) and would make manual firefighting difficult.

It is our position that taking the above factors into consideration and providing a defense-in-depth protection that an automatic or local manual operated gas suppression system (either high or low pressure ${\rm CO_2}$ or halon) be provided for protection of these consoles.

D. Verify that the sprinkler system for protection in the records storage area conforms to NFPA 13. It was noted that the riser nipples appear to be 1/2-inch pipe, which is not permitted by NFPA 13. Also, verify that the wall separating the records storage room from the relay room is of 3-hour fire rated construction, including protection of all duct penetrations.

TVA Response

- A. The translucent panels in the main control room ceiling are not UL listed. They will be replaced with material that meets the guidelines of section C.4.a(4) of Revision 1 to BTP 9.5-1.
- B. The control room complex is separated from other plant areas by minimum 3-hour fire rated contruction. Within the complex, the peripheral rooms are generally separated from the main control room by 1-1/2-hour fire rated construction. One-and-one-half hour fire separation between the main control room and the remainder of the control room complex satisfies the requirements of section C.6.b of Regulatory Guide 1.120, Revision 1.

Refer to control building elevation 732.0 on compartmentation drawing SK-1007 for the layout of the control room complex.

The Sequoyah Nuclear Plant Fire Protection Program Reevaluation indicates that the fire load in the kitchen area exceeds the fire rating of its enclosure. This docomentation is in error since it is based on the use of wooden cabinets which have been replaced by metal cabinets.

The mechanical equipment room on elevation 732.0 contains ventilation equipment that is essential for continued operation of the main control room. Therefore, the equipment room is considered an extension of the main control room fire cell. The two rooms are connected by ventilation ducts located above the suspended ceiling for the housekeeping area between columns C2 and C4. These ducts do not penetrate a fire barrier and are not provided with fire dampers. The housekeeping area is separated from the main control room, the mechanical equipment room, and the essential ventilation ducts for the main control room by 1-1/2-hour rated suspended ceilings and fire walls. The ventilation supply ducts penetrating the ceiling of the housekeeping area consisting of the shift engineer's office, instrument calibration shop, toilet and locker area, and the kitchen area are not provided with fire dampers at the ceiling penetration. Smoke dampers actuated by ionization smoke detectors are provided in the main supply trunk above the 1-1/2-hour fire rated ceiling for each of these areas. These dampers are UL listed and have a 1-1/2-hour fire rating. Upon detection of smoke in any of the housekeeping area rooms, the dampers in the main supply trunk to the affected room or rooms will be isolated thereby closing off supply air to the room or rooms without interrupting essential ventilation supply to the main control room.

Return air ducts from the chart storage room and instrument calibration room are also provided with a rated smoke detector actuated damper in the main return trunk above the suspended ceiling. Isolation of this damper will prevent smoke in these rooms from returning to the control room complex air-handling units thereby preventing contamination of the main control room.

Return ventilation from the shift engineer's office is through a louve: in the wall to the corridor and back to the mechanical equipment room. The louver in the wall between the shift engineer's office and the corridor is provided with a 1-1/2-hour fire rated damper. A glass window between the shift engineer's office and the corridor is provided with a 1-1/2-hour rated roll-up fire shutter which is released by a fusible link.

Exhaust ventilation for the kitchen area and the toilet and locker rooms is through an exhaust fan located in the mechanical equipment room exhausting to the outside through the control building roof. No fire dampers are provided for these ducts.

Additional detector-actuated rated fire dampers are provided between the corridor and the mechanical equipment room to prevent smoke present in the corridor from entering the mechanical equipment room, and in the return air duct within the mechanical equipment room supplying 5200 cfm makeup air to the main control room air-handling units to prevent smoke present in the mechanical equipment room from entering the main control room.

The relay room is separated from the main control room by 1-1/2-hour rated fire wall that extends through the suspended ceilings. Refer to part D. of this response for a discussion of the separation between the relay room and the record storage room.

All fire barrier openings are provided with appropriately rated, UL-labeled assemblies except the previously mentioned housekeeping area ventilation supply ducts and door openings C55 and C56 (refer to drawing SK-1007) which contain special purpose security doors. These doors are made of bullet-resistant, heavy gauge steel and have not been tested by UL. However, the manufacturer has certified that the two doors are equivalent to UL-tested fire doors rated for three hours.

The above-described fire rated separation and smoke control provide adequate protection of the main control room from a fire originating in the peripherial areas of the control room complex. As described in the response to question 20.C, loss of the main control room is an acceptable event since reactor shutdown can be accomplished from the backup control room located in the auxiliary building.

C. Automatic smoke detection is provided within the control room consoles to provide the earliest possible indication of a fire. Portable halon and pressurized water fire extinguishers are provided within the main control room and manual fire hose backup capability is provided immediately outside the room in accordance with the requirements of BTP 9.5-1, Appendix A.

The control room consoles contain only low-voltage cable, which minimizes the possibility of internally generated fires. The consoles are provided with full access doors on the rear of the parels which afford access to the lower recessed portions of the consoles with an extinguisher or fire hose nozzle.

With early detection capability in the control room consoles, a fire can be detected and extinguished in the incipient stage with minimal effect on equipment and electrical circuits.

Should a fire occur that develops beyond the capability of the extinguishing equipment, the main control room can be abandoned and reactor shutdown accomplished from the backup control room located in the auxiliary building.

It is TVA's position that a gaseous suppression system is not necessary for the main control room consoles. Access inside the consoles for manual firefighting would be no better for a gaseous hose system than for a water system. In addition, a gaseous system would not be particularly effective against a deep-seated fire which is the most likely fire condition to occur in the consoles. In order to make a gaseous system effective, excessive amounts of the gas would be required and could result in the unnecessary evacuation of the Main Control Room.

D. The 1/2-inch riser nipples will be replaced with 1-inch nipples to conform to NFPA 13 in the records storage area. The wall separating the records storage room from the relay room is of 1-1/2-hour fire rated construction including 1-1/2-hour rated fire dampers in duct penetrations.

21. In the control building on elevation 685 ft. in both Units 1 and 2, auxiliary instrument rooms, both safety related divisions of one unit are located in each room. The consequence of electrically initiated or exposure fires should be evaluated with regard to plant shutdown capability. In the event that the plant shutdown capability cannot be maintained, an alternate shutdown method should be provided.

TVA Response

The auxiliary instrument room(s) located on elevation 685.0 of the control building are considered an extension of the main control room for the sake of the design of the backup control system. Hence, Sequoyah can establish and maintain a safe shutdown with a total loss of an auxiliary instrument room. See response to question 18.

22. In the cable spreading room of the control building, a preaction sprinkler system is used for protection with one layer of sprinklers located at the ceiling and an intermediate level located approximately half way between the floor and the ceiling. Provide heat collectors for the lower sprinkler heads to prevent ceiling level sprinklers from cold soldering the lower layer of sprinklers.

TVA Response

Heat collectors are provided for lower level sprinkler heads in the spreading room. At the time of the NRC site visit the heat collectors had not been installed.

23. Verify that the controllers of the four fire pumps are separated such that an exposure fire will not jeopardize more than one controller. List the location of each such controller.

TVA Response

The four fire pumps are controlled by switchgear located in separate 480V shutdown board rooms. Refer to compartmentation drawing SK-1004 and Table 23-1 for the switchgear locations.

Table 23-1

Fire Pump	480V Shutdown Board	Room Number
1A-A	1A2-A	734.0-A8
1B-B	1B2-B	734.0-A5
2A-A	2A2-B	734.0-A21
2B-B	2B2-B	734.0-A18

24. Verify that the main control valve of the CO₂ system used for protection of safety related equipment in various rooms is supervised and alarmed and annunciated in the control room.

TVA Response

The CO₂ system provides three valves between the storage tanks and the protected areas—a storage tank shutoff valve, a master selector valve, and a hazard selector valve. The tank shutoff valve is normally locked open and is administratively controlled. The master selector valve is a normally closed, pressure-operated piston valve controlled by a normally energized solenoid pilot valve. The hazard selector valve is identical to the master valve except it is controlled by a normally de-energized solenoid pilot valve. Upon system actuation, the master and hazard selector valves open releasing CO₂ to the hazard area. On loss of power the master selector valve fails open but the hazard selector valve remains closed.

Neither the master nor hazard selector valves can be supervised directly. However, TVA has provided an electrically supervised pressure switch downstream of the hazard selector valves to provide Main Control Room alarm and annunciation when ${\rm CO_2}$ is being released in a hazard area.

All fire detection circuits associated with the ${\rm CO}_2$ protected areas which transmit alarm signals to the Main Control Room are electrically supervised. However, the automatic actuation logic for the ${\rm CO}_2$ systems is not supervised.

The ${\rm CO}_2$ system meets the requirements of NFPA 12 and 72D for equipment supervision. It is TVA's position that the present design is adequate.

25. The information obtained as the result of the site visit was that the cable used at the Sequoyah Nuclear Plant will not pass the flame test in the current IEEE Standard 383. We were informed that some testing had been performed on this cable. Provide the information on the test used as well as the necessary data and criteria.

TVA Response

Table 25.1 contains the requested data for the purchased electrical cable. A description of the various flame tests is given in table 25.2.

. TABLE 25.1

. TVA		
Cable Type 1	Flame Tests	Cable Description
WB, NC ²	IPCEA S-19-81	Single conductor, stranded, nylon jacket, polyethylene insulation
WV, WW	IEEE 383-1974	Multi-conductor, twisted, stranded, shielded, chlorosulfonated polyethylene jacket, crosslinked, polyethylene insulation
MI, WD 2	IPCEA S-19-81 IEEE 383-1974	Single conductor, PVC jacket, crosslinked polyethylene insulation
XT	IPCEA S-61-402	Telephone and coaxial cable
KI, KY	IPCEA S-19-81	Multi-conductor, singles - crosslinked polyethylene PVC jacket, PVC overall jacket
1.5	IPCEA_S-19-81 VTFT3	Single conductor, asbestos braid jacket, silicone rubber insulation
NF, WG, WH	IPCEA S-19-81	Multi-conductor, singles - polyethylene PVC jacket, overall PVC jacket
VR.	VIFI	*Multi-conductor, singles silicone rubber with glass braid, overall jacket asbestos braid
WU	IPCEA S-19-81 MILW 22759/16	Thermocouple cable

¹ The TVA cable type is actually a three letter designation. The third letter was dropped for table brevity as the cable description remains unchanged.

² Single conductors smaller than No. 8 AWG are installed in conduits

³ TVA Vertical Tray Flame Test

TABLE 25.2

IEEE 383-1974

- 1. An eight foot ceble tray was crected vertically and loaded with multiple length of cables arranged in a single layer.
- 2. The flame source was a ribbon gas burner placed very near the bottom of the vertical tray.
- 3. The criteria for failure was a propagating fire in the tray above the flame source for the total length of the tray.

UL-44

- 1. A three sided metal enclosure was erected vertically and loaded with a single conductor.
- 2. The flame source was a Turrill gas burner placed approximately near the center of the cuble specimen.
- 3. The following is the criteria for failure:
 - A. A single conductor wire that flamed longer than 1 minute following any of the five 15-second applications of the flame.
 - B. The wire igniting any combustible material in its vicinity during, between, or after the various applications of the flame.
 - C. A damage of more than 25 percent of the indicator material during, between, or after the various applications of the flame.

TVA Vertical Tray Flame Test

- 1. An eight foot ladder type metal cable tray was erected vertically and loaded with several conductors from end to end on a single level.
- 2. A 120/240-volt ac test circuit was used to monitor circuit integrity during the test.
- 3. The flame source was crumpled burlap soaked with transformer insulating oil and placed several inches above the lower cable end.
- 4. The following was the criteria for failure:
 - A. Propagating fire results.
 - B. Circuit integrity loss in less than 15 seconds after ignition.
 - C. Excessive smoke appearing from cable.
 - D. Hot drippings from cable that may ignite fire in lower areas.

TABLE 25.2 (Continued)

IRCEA S-19-81/IRCEA S-61-ho2 (Flame Resisting Test)

1. The flame resisting tests of the above are exactly the same as the previously described test of UL-44(1976) except part B of the failure criteria which is not adhered to.

MILW-22759/16

- 1. A three-sided metal enclosure was erected vertically and loaded with a single wire.
- 2. The flame source was a Bunsen burner applied approximately near the center of the cable specimen.
- 3. The following is the criteria for failure:
 - A. A single conductor that flamed longer than five seconds after the flame is withdrawn.
 - B. A flame travel of more than 0.25 inch from flame mark on cable after the flame is removed.

26. Verify that hose houses equipped with hose and combination nozzle and other auxiliary equipment recommended in NFPA 24, "Outside Protection," is spaced not more than 1000 ft. apart.

TVA Response

Hose houses are spaced less than 1000 feet apart. However, they are not completely furnished with the equipment listed in NFPA 24. The following will be provided:

```
250 ft - 2-1/2" hose (on wheeled cart)
150 ft - 1-1/2" hose
     - 2-1/2" variable fog nozzles
2
       - 1-1/2" variable fog nozzles
       - Fire axe
       - Crow bar
2
       - Hydrant wrenches
4
      - Coupling spanners
      - Hose and ladder straps
      - 2-1/2" by 2-1/2" by 2-1/2" gated wye
      - 2-1/2" by 1-1/2" by 1-1/2" gated wye
       - 2-1/2" by 1-1/2" reducers
- 2-1/2" adapters (female to male)
2
222
       - 1-1/2" adapters (female to male)
       - 2-1/2" adapters (double male)
2
      - 1-1/2" adapters (double male)
      - 2-1/2" adapters (double female)
- 1-1/2" adapters (double female)
2
2
      - Wheeled fire extinguisher (rated 320 B:C)
      - Tee handle wrench
       - Portable hand lantern (battery operated)
```

27. Provide a description on the operation and sequencing of the station fire pumps including isolation of the RWST valves, pushbutton stations located next to fire hose stations including supervision of the circuits and how they are connected to the fire alarm control panel as well as the fire pump controllers. Consideration should be given to failure of any of the above circuits and its affect on the fire protection system.

TVA Response

The four station fire pumps are capable of three modes of operation—automatic, manual, and standby. In normal operation, two pumps are placed in automatic mode and two in standby. Upon receipt of an automatic start signal, one automatic pump starts immediately and the second starts three seconds later. If the fire protection system pressure cannot be maintained above 130 psig because of high system demand, the two standby pumps start ten seconds after the receipt of the initial signal. Manual operation of the pumps is also provided from the main control room and the individual pump switchgear.

The automatic start signals are originated in the circuits shown in block diagram form in Figure 27-1. Local control panels are provided for each fixed suppression system to actuate the system and to transmit a signal to start the fire pumps. These panels receive initiation inputs from the fire detection system and/or from handswitches located in the protected areas. Additional fire pump start signals are generated by pushbuttons near fire hose stations located throughout the plant. All the start signals are processed through the centralized automatic start logic located in three panels in the unit 1 and 2 auxiliary instrument rooms. From this logic, the start signals are transmitted simultaneously through separation relays to the individual pump switchgear. The pump sequencing is controlled by the switchgear as determined by the position of the handswitches located in the main control room. Refer to Table 27-1 for the location of the major system components and the SK-1000 series compartmentation drawings for definition of the column lines.

Upon starting a fire pump in any mode, its switchgear provides an output to close the raw service water head tank isolation valves.

The pushbutton stations located next to the fire hose stations are provided to start the fire pumps only. They are not connected to the fire detection system and they are not supervised.

No single failure in the circuits shown in Figure 27-1 or their power supplies will result in an unacceptable loss of firefighting capability. A failure in a local control panel could prevent the automatic initiation of the associated suppression system and the fire pumps during a fire. However, the failure would not affect the detection system's annunciation capability so the unit operator can manually start one or more fire pumps and can dispatch the fire brigade to manually initiate the suppression system. Automatic start logic failures can prevent the automatic actuation of all fire

pumps. This would not affect the suppression system operation, but would require manual starting of pumps from the main control room upon receipt of a detection system annunciation. A failure in the separation relays, 480V switchgear, or fire pumps would affect one pump only. The remaining three pumps would be operable in any mode. Failures in the handswitches, pilot valves, pushbuttons, and the system's connecting circuits are no more restrictive than those failures discussed above.

The consequences of an exposure fire are no more restrictive than the failures addressed above except in the case of the separation relays. This relay logic will be separated by 20 feet to ensure that the MCR control functions for no more than one fire pump can be affected by an exposure fire.

The fire pumps are assigned trained designations with two pumps in train A and two in train B. The manual control circuits (main control room switch, 480V switchgear, power supply, and connecting circuits) for the pumps are separated per the requirements for Class 1E electrical components.

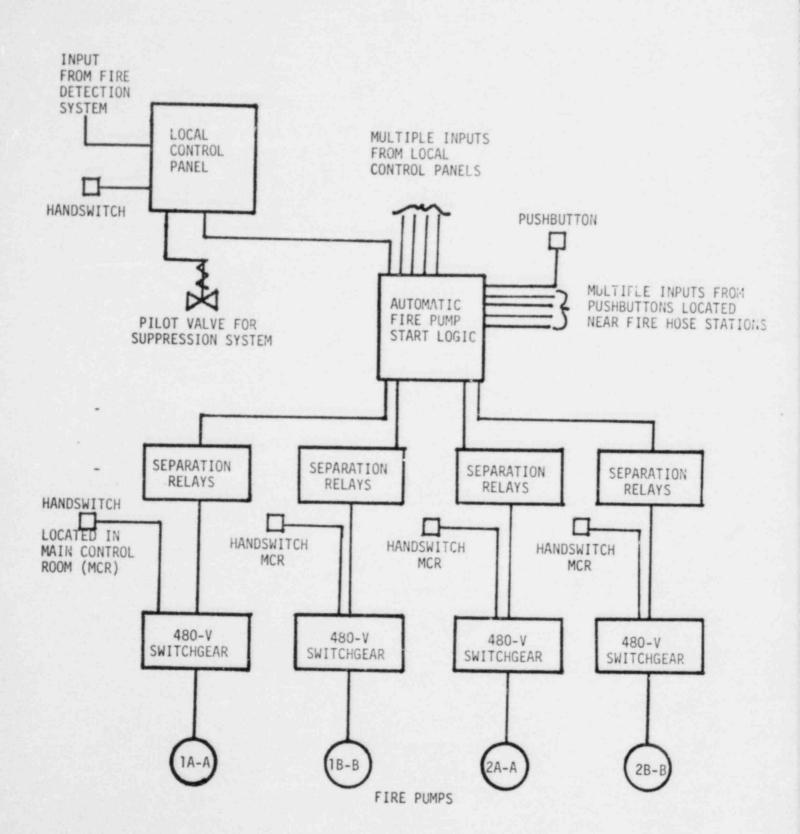


FIGURE 27-1

TABLE 27-1

Component	Building	Elevation	Column	Room Name
Local control panels	Loca	ted Throughout	the Plant	
Automatic fire pump start logic	Control	685.0	p,C5 p,C9	Units 1&2 Aux. Instr.
Fire pump 1A-A	Intake Pumping Station	705.0	-	-
1A-A separation relays	Control	685.0		Unit 1 Aux. Instr.
1A-A 480V switch- gear	Auxiliary	734.0	t,A2	480V Shutdown Bd. Rm. 1A2
Fire Pump 1B-B	Intake Pumping Station	705.0	-	*
1B-B separation relays	Control	685.0		Unit 1 Aux. Instr.
1B-B 480V switch- gear	Auxiliary	734.0	r,A3	480V Shutdown Bd. Rm. 1B2
Fire pump 2A-A	Intake Pumping Station	705.0	-	-
2A-A separation relays	Control	685.0		Unit 1 Aux. Instr.
2A-A 480V switch- gear	Auxiliary	734.0	r,A13	480V Shutdown Bd. Rm. 2A2
Fire Pump 2B-B	Intake Pumping Station	705.0		•
2B-B separation relays	Control	685.0		Unit 1 Aux. Instr.
2B-B 480V switch- gear	Auxiliary	734.0	t,A14	480V Shutdown Bd. Rm. 2B2

Quality Assurance Branch Request for Additional Information

Your description in Sections A.l and B.5 of your submittals relative to your compliance with the "Guidelines in Appendix A of BTP 9.5-1" does not provide adequate information on your fire protection organization for us to complete our review. Therefore, please provide the following information:

- Describe the upper level management position that has the overal responsibility for the formulation, implementation, and assessment of the effectiveness of the fire protection program.
- Describe the offsite position(s) that has direct responsibility for formulating, implementing, and periodically assessing the effectiveness of the fire protection program for the nuclear plant, including fire drills and fire protection training.
- 3. While the Plant Superintendent is generally responsible for all activities at the facility, describe any further delegation of these responsibilities for the fire protection program such as training, maintenance of fire protection systems, testing of fire protection equipment, fire safety inspections, fire fighting procedures, and fire drills.
- 4. Describe the authority of your fire brigade leader relative to that of your Shift Engineer.

TVA Response

In the TVA organization structure, the General Manager has overall responsibility for the formulation, implementation, and assessment of the effectiveness of the fire protection program. In accordance with the TVA policy of management accountability, the General Manager has delegated these fire protection program responsibilities through the respective managers of offices to the Director of Engineering Design, the Director of Construction, and the Director of Power Production within their respective areas. To fulfill these responsibilities, these directors maintain qualified staffs to ensure that all aspects of the fire protection program are, at a minimum, consistent with applicable regulatory requirements. To ensure that an integrated program is maintained, TVA has established a fire protection panel composed of key management representatives from each of these three divisions for review and coordination of program policies and application in interface areas.

- 2. The offsite position(s) that has direct responsibility for formulating implementing, and periodically assessing the effectiveness of the fire protection program for the nuclear plant, including fire drills and fire protection training is the Fire Protection Section of Safety Engineering Services. The program is formulated and implemented through Division Procedures Manual N7852. Section F3 of this manual establishes the requirement for an annual fire audit of each nuclear facility.
- 3. Delegation of responsibilities for the fire protection program such as training, maintenance of fire protection systems, testing of fire protection equipment, fire inspections, firefighting procedures, and fire drills is contained in Division Procedures Manual N78S2.
- 4. The authority of the fire brigade leader relative to that of the shift engineer is contained in Sequoyah Nuclear Plant Physical Security Instruction Physi-13, Section 1.0.

This instruction states in part that the duty assistant shift engineer, unit 1, shall be the fire brigade leader. He shall remain the leader unless relieved by his inline supervisor (the shift engineer). It further states that he shall keep the control room informed as to the fire conditions.

REQUEST FOR ADDITIONAL INFORMATION

QA FOR FIRE PROTECTION FOR SEQUOYAH (AND WATTS BAR) NUCLEAR PLANTS

F421.1 TVA's letter of January 24, 1977, to NRC regarding fire protection for Sequoyah (and Watts Bar) does not indicate whether the QA program for fire protection during design and construction is under the management control of the QA organization. This control consists of (1) formulating and/or verifying that the fire protection QA program incorporates suitable requirements and is acceptable to the management responsible for fire protection and (2) verifying the effectiveness of the QA program for fire protection through review, surveillance, and audits. Performance of other QA program functions for meeting the fire protection program requirements may be performed by personnel outside of the QA organization. The QA program for fire protection should be part of the overall plant QA program. These QA criteria apply to those items within the scope of the fire protection program, such as fire protection systems, emergency lighting, communciation, and emergency breathing apparatus as well as the fire protection requirements of applicable safety-related equipment.

We find that the letter does not describe sufficient detail to address the ten specific quality assurance criteria in Branch Technical Position APCS3 9.5-1 during design and construction. In order for the QAB to fully evaluate your plan to meet these criteria, additional detailed description is necessary. Examples of the detail we would expect TVA to provide are given in Attachment 6 to Mr. D. B. Vassallo's letter of August 29, 1977. If, however, you choose not to provide this detail, you may apply the same controls to each criterion that are commensurate with the controls described in your QA program description, Section 17.1A. These controls would apply to the remaining design and construction activities of Unit Nos. 1 and 2. If you select this method, a statement to this effect would be adequate for our review of the QA program for fire protection.

TVA Response

The QA program fire protection has been reviewed by appropriate TVA management including the QA organization to verify that the program incorporates suitable requirements and is acceptable. The appropriate QA personnel are responsible for verifying the effectiveness of the program through periodic audits.

The QA criteria apply to all fire protection related systems equipment and components within the scope of the fire protection program including fire protection systems, emergency lighting, communication, and emergency breathing apparatus, to the extent that they may affect the fire

protection for nuclear safety-related plant features. Our submittal of January 24, 1977, to the NRC will be revised as follows to reflect a more detailed discussion of the existing procedures and programs within the Office of Engineering Design and Construction (OEDC) that are required for fire protection related systems:

C. Quality Assurance

TVA Compliance

As indicated in the response to item A.1, Personnel, and as amplified in our response to Quality Assurance Branch question 1, TVA has delegated the responsibilities associated with the various aspects of fire prevention and protection to organizations which have personnel qualified to handle those functions.

The responsibility for the operational aspects of fire protection has been delegated to the Division of Power Production in TVA's Office of Power. The Office of Power utilizes TVA's established QA program designed to meet the requirements of Appendix B to 10CFR Part 50. This program applies, for the operational phase of TVA's nuclear power plants, to the activities affecting the quality of those critical structures, systems, and components (CSSC) whose satisfactory performance is required for safe plant operations; to prevent accidents that could cause undue risk to the health and safety of the public; and to mitigate the consequences of such accidents in the unlikely event that they should occur. Those fire protection features protecting critical structures or areas will be included in the CSSC list and as such will fall under TVA's operational QA program. The operational QA program is described in the Sequoyah Nuclear Plant Final Safety Analysis Report (FSAR), Chapter 17. Responsibility for the design and construction aspects of fire protection has been delegated to the Office of Engineering Design and Construction (OEDC). OEDC has documented procedures and specifications which govern its activities and which apply to all systems for which OEDC has responsibility. These procedures are aimed at ensuring that the design and construction of TVA facilities result in a reliable and quality product. As applied to fire protection, these documents will require, in part, that the actions required in C.1 through C.10 below be accomplished.

C.1 Design Control and Procurement Document Control

TVA Compliance

All fire protection related design criteria and procurement documents be reviewed by appropriate qualified individuals to ensure that applicable regulatory and design requirements are properly and adequately specified and, as appropriate, quality standards such as fire

protection codes and independent laboratory testing are included. All changes to these documents and deviations therefrom, including requests for field changes, are reviewed in a similar manner. The above includes appropriate design reviews to verify separation and isolation requirements as they relate to fire protection.

C.2 Instructions, Procedures, and Drawings

TVA Compliance

The design, installation, and tests associated with fire protection related systems be accomplished in accordance with written and approved instructions, procedures, and drawings. These documents must be reviewed by qualified personnel to ensure that applicable regulatory and design requirements are properly and adequately specified. This documentation includes any specialized training requirements for installation.

C.3 Control of Purchased Material and Equipment

TVA Compliance

The procurement of fire protection related material and equipment require either an inspection at the manufacturer's facility or a receiving inspection to verify conformance to procurement requirements.

C.4 Inspection

TVA Compliance

The installation of fire protection related systems be verified by independent inspection to ensure that it meets the specified requirements and conforms to installation drawings and procedures. The inspection must be conducted in accordance with documented procedures. The procedures controlling inspection activity require that the inspection procedures or instructions shall be available with necessary drawings and specifications to use procedures, instructions, and/or drawings, including revisions, supporting the inspection activities shall be documented. The results of these inspections shall be recorded.

C.5 Test and Test Control

TVA Compliance

Fire protection systems be tested under TVA's preoperational test program. This program requires that tests be conducted in accordance with written test instructions which are reviewed to ensure that applicable regulatory and design requirements are properly and adequately specified. The acceptance criteria shall be evaluated and documented and all exceptions documented and controlled.

C.6 Inspection, Test, and Operating Status

TVA Compliance

Items that have satisfactorily completed tests or inspections be identified by appropriate means.

C.7 Nonconforming Items

TVA Compliance

Nonconforming items be identified and controlled to prevent inadvertent use or installation. This includes documentation of the disposition of the nonconformance. The Thermal Power Engineering (TPE) Design Project shall review all nonconformance reports and may request review by other branches within EN DES as appropriate. The TPE Design Project Manager shall approve the disposition of the nonconformance.

C.8 Corrective Action

TVA Compliance

Significant and repetitive conditions adverse to fire protection such as nonconformances with installation drawings and deviations from specifications be controlled and appropriate corrective action taken and documented. Conditions involving fire incidents and the corrective actions taken shall be promptly reported to a cognizant level of management for review and assessment.

C.9 Records

TVA Compliance

Records be maintained for fire protection systems to document conformance to the prescribed criteria. These records must include review of criteria, procurement documents and drawings, inspections, test results, non-conformances, and modification records.

C.10 Audits

TVA Compliance

Independent audits by QA personnel be conducted annually in accordance with written procedures to ensure conformance to procedural requirements applicable to fire protection related systems. The audits must be documented along with the corrective action taken and reviewed by the appropriate level of management to ensure that the program is effective.

Additional Discussion Items

The following items have been discussed informally with the NRC Staff and are included as additional information.

- No air-cooled transformers are located such that fires resulting from their failure would affect equipment or circuits identified in the response to question 1 that are required to achieve hot shutdown.
- There is no fixed equipment containing flammable liquids in the vicinity of the entrance to the central room of the auxiliary control area. However, TVA will provide curbs at the doors between the auxiliary control area's central room and transfer switch rooms as protection against transient flammable liquid hazards. The curbs will ensure that a flammable liquid fire in any one of the five rooms will not jeopardize safe shutdown capability from the MCR.
- 3. Spray shields are provided for the reactor coolant pumps and all associated external lubricating oil piping and lift pumps such that the rupture of any oil-containing component will be contained and drained away from the coolant pumps.

SCHEDULE FOR COMMITMENTS

All modifications resulting from commitments made in our submittal of January 24, 1977, shall be implemented prior to the initial fuel loading of the associated unit.

TVA proposes to implement modifications resulting from Nonconformance Report SWP-78-S-2 and from commitments made in this document per the following schedule:

ASB Question No.	Action or Modification Required	Design Completion Date	Construction Completion Date
1	Reroute conduit and cable identified in Table 1.2.	6/30/79	9/30/79 See note 1
	Wrap instrumentation conduit identified in Table 1.3 with 1-inch-thick Kaowool Blanket.	6/30/79	9/15/79
	Enclose exposed conduit identified in Table 1.4 with a 1-1/2-hour fire barrier.	7/31/79	11/30/79
	Develop casualty procedures to bring plant to safe cold shutdown with fire damage to cabling identified in Table 1.5.	8/31/79	12/31/79
	Enclose cables identified in Figure 1-2 with a 1-hour fire barrier consisting of 2-inch-thick Kaowool M Board.	7/31/79	11/30/79
3B(i)	Install additional fire doors identified in Nonconformance Report SWP-78-S-2.	4	See note 2
	Install remaining fire doors identified in Table 3B(i)-3.		See note 2
3B(ii)	Install additional fire dampers identifed in Nonconformace Report SWP-78-S-2.		See note 2
	Install view in fire dampers identified in the e 3B(ii)-3.	6/30/79	8/31/79
	Add percurete to fire dampers PCO-39-17A and 0-31A-148.		See note 2

ASB Question No.	Action or Modification Required	Design Completion Date	Construction Completion Date
3B(iii)	Coat the metal barrier plate in cable tray penetrations with pyrocrete.	6/30/79	10/31/79
4	Coat exposed surfaces of cables with flame retardant material in areas outside primary containment containing one or both safety-related divisions.	6/30/79	See note 3
6	Install fixed self-contained lighting in areas that must be manned for safe cold shutdown and for access and egress routes to and from all fire areas.	7/31/79	12/31/79
7	Electrically supervise the fire protection power distribution panel for loss of power.	7/31/79	10/31/79
8	Electrically supervise the fire pumps for loss of line power and motor running condition.	7/31/79	10/31/79
90	Provide additional sprinkler heads or relocate existing heads to clear overhead obstructions.	8/31/79	See note 3
118	Enclose ERCW junction box with 1-1/2-hour fire barrier.	7/31/79	9/30/79
	Provide a 1/2-hour fire barrier of 1-inch Kaowool Blanket between redundant power cables in the ERCW junction box.	7/31/79	9/30/79
13B	Provide automatic sprinkler protection under the pipe break barrier for the auxiliary feedwater pumps.	7/31/71	3/31/80
130	Provide automatic sprinkler protection under the mezzanine for all component cooling water pumps.	7/31/79	3/31/80
13D	Provide a 1/2-hour fire barrier between train A and B component cooling water pumps.	7/31/79	3/31/80
13F	Provide additional smoke detectors to actuate the sprinkler systems in TVA responses to questions 13B and 13C.	7/31/79	3/31/80
14	Provide heat detectors in the ERCW pump . The of the intake pumping station.	7/31/79	10/31/79

ASB Question No.	Action or Modification Required	Design Completion Date	Construction Completion Date
16	Provide MCR alarm and annunciation for lock-out of diesel generator room and board room CO ₂ systems.	7/31/79	11/30/79
17A	Remove sliding fire doors for diesel generator rooms and replace with normally closed fire doors.	8/31/79	10/31/79
20A	Replace the translucent panels in MCR with material that meets the guidelines of section C.4.a(4) of Revision 1 to BTP 9.5-1.		See note 3
200	Replace the existing 1/2-inch riser nipples with 1-inch nipples in the records storage area.	7/31/79	9/30/79
26	Provide equipment for fire equipment houses.	7/31/79	10/31/79
27	Relocate fire pump separation relays to achieve 20-foot spatial separation.	8/31/79	1/31/80
	Install curbs at doors to transfer switch rooms of the auxiliary control complex.	6/30/79	7/31/79

Notes:

- Construction completion date is based on assumption that five days will be available at operation mode 5 or 6.
- 2. Prior to initial fuel loading of the associated unit.
- 3. End of first refueling outage for unit 1.