

APPENDIX A

NOTICE OF DEVIATION

Duke Power Company
McMurry

License Nos. CPPR-83
& CPPR-84

Based on the results of the NRC inspection conducted on September 11-14, 1979, certain of your activities appear to deviate from your commitments to the Commission and have safety significance as indicated below:

- A. Section 17.1.17.4 of the FSAR states that the QA records storage facility will meet the provisions of ANSI Standard N45.2.9, "Requirements for Collection Storage and Maintenance of QA Records for Nuclear Power Plants". Section 5.6 of ANSI N45.2.9 requires QA records storage facilities to be provided with a fire protection system. Duke's QA Procedure QA-301 requires construction site QA storage facilities to be provided with either a dry chemical or gas fire suppression system.

Contrary to the above, the construction site QA records storage facility is not provided with an automatic fire suppression system.

- B. Sections E.3.(c) and E.3.(d) of the licensee's Fire Protection Review (FPR), January 1978 revisions, states that fire protection piping systems will be installed to meet the applicable National Fire Protection Association (NFPA) standards. Section 8-8.2 of NFPA-24, "Outside Protection", Section 1-11.2.2 of NFPA-13, "Sprinkler Systems"; and, Section 7-1.2.1 of NFPA-14, "Standpipe and Hose Systems indicate the minimum flow required to properly flush the fire protection water supply piping systems."

Contrary to the above, Duke's Construction Procedure CP-419 provided a description for flushing the fire protection piping systems but fails to indicate the rate of flow required to flush the systems. Therefore, it appears that portions of the piping systems may not have been adequately flushed.

- C. Section F.7 of the licensee's FPR states that the area beneath the cable trays in the west portion of Unit 1 Battery Room 701 will be provided with an automatic sprinkler system to protect the cable concentrations from an exposure fire. Section E.3.(c) of the FPR states that the automatic sprinkler systems installed at the plant will meet the provisions of NFPA-13, "Sprinkler Systems".

Contrary to the above, the sprinkler system for the west portion of Unit 1 Battery Room 701 does not meet the provisions of NFPA-13 due to the following:

1. Upright type sprinkler heads are installed in the pendent position which is not permitted by Section 3-16.2.2 of NFPA-13.

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2. Sprinkler heads are installed beneath the lowest cable tray elevation and are not provided with heat shields as required by Section A-3-16.8 of NFPA-13. These shields are shown on the construction drawings.
3. Sprinkler protection is not provided between column lines 53AA/54AA and 53BB/54BB. The distance between the end sprinkler head and the wall at column line 53AA/54AA is approximately 18 feet and this end head is also obstructed by the structural supports for the cable trays. Sections 4-2.1.2 and 4-2.1.4 of NFPA-13 requires that the maximum distance between the walls and end sprinkler heads not exceed 7.5 feet and Section 4-2.4.6 of NFPA-13 requires additional sprinkler heads for areas where protection is obstructed by structural supports.
4. Provisions are not provided to properly test the waterflow alarm indicator. Sections 3-9, 3-17.4 and 3-17.6 of NFPA-13 require that waterflow alarm detection devices be arranged to permit testing by actual waterflow. The test connection is required to be arranged as indicated by Figure A-3-9.1.2 of NFPA-13.
5. Operation of the waterflow alarm device will not activate the deluge valve in the water supply piping system to the auxiliary building as required by Sections 5-1.1 and 5-3.1 of NFPA-13.

These same discrepancies may also be applicable to other systems installed at plant.

- D. Sections E.3.(c) and E.3.(d) of the FPR state that the fire protection piping systems will conform to the applicable NFPA standards (NFPA-13, "Sprinkler Systems"; NFPA-14, "Standpipe and Hose Systems"; and, NFPA-15, "Water Spray Fixed Systems").

Contrary to the above, the water supply piping to the fire protection systems within the auxiliary building does not meet the applicable NFPA standards due to the following:

1. Normally closed deluge valves which control the water supply to the auxiliary building are manually activated from manual stations within the auxiliary building and control room by electrical circuits which are not electrically supervised as required by Sections 1-6.1 and 5-3.6 of NFPA-13 and 8-5.2 of NFPA-15.
2. The sprinkler system waterflow alarm devices are not arranged to activate the deluge valves controlling the water supply to the fire protection piping systems as required by Sections 5-1.1 and 5-3.1 of NFPA-13.

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3. The arrangement of the 1-inch by-pass and proposed associated alarm devices will not provide a reliable means of supervising the piping systems as required by Sections 3-14.2.3 and 5-3.5.2 of NFPA-13.