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G. CARL ANDOGNINI
SUPERINTENDENT
NUCLEAR OPERATIONS DEPARTMENT

February 29, 1980

BECo. Ltr. #80-36

Mr. Eldon J. Brunner, Chief
Reactor Operations and Nuclear Support Branch
Office of Inspection and Enforcement
Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA. 19406

License No. DPR-35
Docket No. 50-293

Response to IE Inspection #79-21

Dear Sir:

Inspection No. 79-21, dated January 21, 1980, contained one item of noncompliance. Boston Edison Company's response to that item is presented as follows:

Deficiency

Technical Specification 6.8.D states, "Written procedures to implement the Fire Protection Program shall be established, implemented, and maintained."

Plant Procedure 1.3.4, "Procedures," Paragraph III.A, states, in part, "...Procedures shall be implemented in accordance with safety standards, Technical Specifications, and requirements of regulatory agencies..."

Contrary to the above, the following plant procedures for operation of Fire Protection System:

- No. 2.2.25, "Fire Water System"
- No. 2.2.26, "Deluge and Sprinkler Systems"
- No. 2.2.27, "Carbon Dioxide System"
- No. 2.2.28, "Dry Chemical Systems"
- No. 2.2.29, "Smoke Detection Systems"

did not adequately implement or were not in accordance with various Technical Specification requirements as specified in Technical Specifications 3.12 and 4.12.

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Response

The Fire Protection Operating Procedures found to be in noncompliance during the subject NRC Inspection will be revised to implement the requirements of Plant Procedure 1.3.4 and Technical Specifications 6.8.D, 3.12 and 4.12. Revisions to these procedures incorporating the applicable sections of the referenced requirements will be completed by April 15, 1980. However, we would like to clarify certain misconceptions with the NRC findings specific to Procedures No. 2.2.25 "Fire Water System" and No. 2.2.26 "Deluge and Sprinkler Systems".

Regarding Procedure No. 2.2.25 the NRC findings state that "the procedure appears to allow Fire System operation between 110-125 psig with no operator or automatic actions. T.S. 4.12.B states that Fire System operation will be a minimum of 125 psig." Unfortunately T.S. 4.12.B has been taken out of context and improperly applied. The entire requirement reads as follows:

"by verifying that each pump starts and delivers at least 2000 gpm while maintaining a system pressure of at least 125 psig."

This requirement applies to the motor driven and engine driven fire pumps only as denoted in T.S. 3.12.B, while T.S. 4.12B requires that each pump deliver 2000 gpm at a system discharge pressure of 125 psig during operation. A jockey pump is utilized to maintain normal system pressure which prevents the motor driven fire pump from cycling on and off. A continuous drop in system pressure will activate the fire pumps which will then deliver their rated capacity at rated pressure. The system as currently designed and described does meet the requirements of 4.12.B and is based on sound fire protection engineering practice and judgement. Therefore, no changes will be made to the procedure regarding this matter.

As to the NRC finding relative to Procedure 2.2.26 in which the Inspector stated; 1) "Amendment #35 dated December 21, 1978 required a spray/sprinkler system be installed in the Standby Gas Treatment System (SBGT)" and 2) "the current built in spray system in the SBGT may not meet the requirements of T.S. 3.12.C and 4.12.C," we respond as follows:

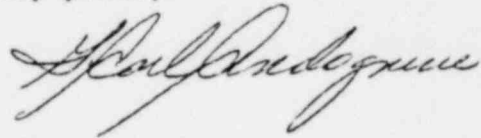
- 1) The Commission Safety Evaluation Report (SER) accompanying Amendment #35, clearly identifies the adequacy of the existing automatic water suppression system for protection of fire in the charcoal filters. As stated in Section 5.11 of the SER, the only modification required in this area was the addition of a 25 foot length of hose to the hose station adjacent to this area.
- 2) The function of the SBGT Filter Spray System as designed, is to cool exothermic reactions within the charcoal filters to prevent radioactive release in the event of an unsuppressed fire. Although it's design is dissimilar to the other spray and/or sprinkler systems listed in T.S. 3.12.C, in that it is not designed to NFPA-13 criteria, the Commission was totally cognizant of this fact at the time of issuance of Amendment #35 and the requirements of T.S. 3.12.C and 4.12.C

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as issued were considered appropriate and applicable for this system. Therefore, no modifications will be made in this area; however, as stated above, operating procedures for this system will be implemented in accordance with Plant Procedure 1.3.4 by April 15, 1980.

We trust these actions are responsive to your concerns, however, should you desire additional information please contact us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Paul R. DeGruene".