# VIRGINIA ELECTRIC AND POWER COMPANY RICHMOND, VIRGINIA 28261

June 30, 1980

Mr. Harold R. Denton, Director Serial No. 354L/061478 Office of Nuclear Regulatory Regulation NO/SWB:smv Attention: Mr. Steven A. Varga, Chief Docket Nos. 50-280 Operating Reactors Branch No. 1 50-281 Division of Operating Reactors 50-338 U. S. Nuclear Regulatory Commission 50-339 Washington, D. C. 20555 License Nos. DPR-32 DPR-37 NPF-4

NPF-7

Dear Mr. Denton:

# NORTH ANNA POWER STATION SURRY POWER STATION

We have received and reviewed the proposed Rule entitled "Fire Protection Program for Nuclear Power Plants Operating Prior to January 1, 1979". The purpose of this letter is to comment on the proposed Section 50.48 to 10CFR50 transmitted May 19, 1980 and provide a status of the fire protection modifications at North Anna and Surry power stations. Comments on the proposed Appendix R to 10CFR50 will be transmitted in a separate letter.

The proposed Rule requires all fire protection modifications identified by the proposed Appendix R to 10CFR50 and the NRC staff to be completed by November 1, 1980 with the exception of modifications required for alternate shutdown capability which is required to be complete April 1, 1981.

As authorized in the proposed Rule, Vepco requests continued approval of the original commitment dates for fire protection modifications for North Anna and Surry as given in the Station's Safety Evaluation Reports, issued February, 1979 and September 19, 1979, respectively. The original commitment dates for completion of the fire protection modifications for North Anna and Surry were established based on Vepco's best effort. The schedule allows for an orderly and thorough review and design of the modifications followed by prompt material delivery and installation.

The status of these modifications for each unit at North Anna and Surry is given below. Further status of the Surry fire protection modifications and design information is included in Attachment (1).

I. North Anna Unit 1 - All fire protection modifications are complete with the following exceptions. These modifications will be completed during the second refueling outage currently scheduled to start in December, 1980.

In view of the above and the fact that an integrated plan for design and installation of the fire protection modifications has been established and is functioning to complete the modifications in an orderly and timely fashion, Vepco requests reconfirmation of the original commitment dates outlined in the Safety Evaluation Reports. We will continue to make efforts to improve the existing schedule but feel November, 1980 is not possible for the identified items.

Very truly yours,

B. R. Sylvia Manager - Nuclear Operations and Maintenance

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Attachments

cc: Mr. James P. O'Reilly, Director NRC Office of Inspection and Enforcement Region II Atlanta, Georgia 30303

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3. Shaded portion represents project target complete,

185UR DATE: 6-9-80

#### ATTACHMENT (1) (Continued)

#### 3.1.11.13 FIRE DOORS

The door between the main control room annex is a bullet-proof door locked closed with a card reader. The louvers in the door will be modified to accept covers which can be quickly installed to control smoke. The attached sketch shows the design of these covers.

## 3.1.18(1), (3), (7), (8) TURBINE BUILDING HOSE STATIONS

Four new hose stations have been installed in the Units 1 & 2 turbine buildings.

The pipe for the new hose racks is routed from an existing 4 in. fire protection header in the Unit 1 turbine building. In the Unit 1 turbine building, the hose stations are located in the northwest corner at elevation 40'-0" and on the lube oil room roof at elevation 32'-5". In the Unit 2 turbine building, the hose stations are located outside the Unit 2 cable tray room at elevation 50'-8" and in the southwest corner at elevation 32'-5". The hose rack outside the cable tray room is equipped with a fog-type spray nozzle for electrical fires.

Additional hose is presently being installed in the turbine building hose racks, and verification that all areas defined by item 3.1.18 can be reached by fire hoses will be reported in the July status report.

#### 3.1.18(5) CABLE VAULT DRY STANDPIPE

A dry standpipe hose station will be installed in each service building cable vault. Two  $2\frac{1}{2}$  inch supply pipes will tap into the 4 inch auxiliary building hose rack header on the 27'-6'' level of the auxiliary building. The  $2\frac{1}{2}$  inch pipe will separately supply Unit 1 and Unit 2 hose racks. Each of the two supply pipes will have an isolation valve on the 27'-6'' level of the auxiliary building. The supply pipe will penetrate with the auxiliary building wall and enter the high bay area of the cable vault and separately supply the  $1\frac{1}{2}$  inch hose station located in Unit 1 and Unit 2 cable vault in close proximity to the door to the Emergency Switchgear Room. The hose stations will be provided with variable gallonage fog nozzles with ball valve shutoff.

# 3.1.18(16) AUXILIARY BUILDING HOSE STATION REDUNDANT WATER SUPPLY

At present, a 6 in. line branches off the Turbire Building fire suppression header to supply water to the Auxiliary Building General Area Exhaust Filter (1-VS-FL-14) Deluge System. Inside the Auxiliary Building, at the 48 ft. elevation, a 6 in. tee has been installed in this line. One branch of the tee has been blank flanged. The blank flange will be removed and a 6 in. line, reduced to 4 in., will tie in and run vertically to the 62 ft. elevation and connect into the 4 in. Auxiliary Building Fire Hose System. Manual isolation valves will be installed in the new pipe run to provide system isolation such that failure in one supply will not cause a loss of both systems.

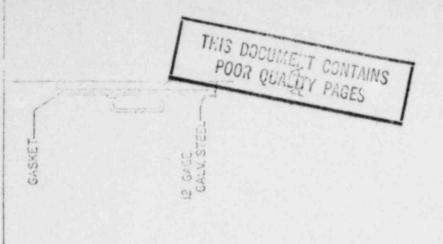
### ATTACHMENT (1) (Continued)

With this design, the Auxiliary Building fire hose stations can either supply or be supplied from Unit 1 or Unit 2 Turbine Building fire suppression header. The Auxiliary Building Hose System can also supply, at a reduced flow, the Auxiliary Building General Area Exhaust Filter (1-VS-FL-14) should the normal supply fail.

# 3.1.25(2) CHARGING PUMP COOLER REDUNDANT WATER SUPPLY

The present charging pump service water system incorporates the use of four charging pump service water pumps. Two service water pumps are used per unit with cross-connect capabilities between units. All four pumps are located in Mechanical Equipment Room No. 3 which does not contain fire barriers. A fire in Mechanical Equipment Room No. 3 could render all four pumps inoperable A Safe Shutdown cannot be accomplished without a source of cooling water to the charging pump lube oil coolers. To meet this need, a redundant supply of water will be supplied to the charging pump service water system. This source of water will come from the fire protection system in the auxiliary building.

Presently, a 2 in. fire line supplies a hose rack at elevation 2 ft-0 in. T discharge of all four service water pumps is routed together near this hose rack. A 90 degree elbow will be removed, and a 2 in. x 2 in. x 2 in. tee will be installed. From this, a 2 in. line will tie in and connect to the four service water lines through a single line per unit, which then branches to either pump discharge. There will be one manual isolation valve per unit to prevent inadvertently cross-connecting the charging pump service water and fire protection systems. This system will be a backup system to be used only in the event of a loss of all charging pump service water pumps.



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