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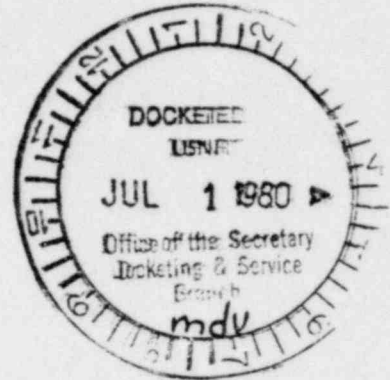


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June 17, 1980



Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: Proposed Fire Safety Regulations

Gentlemen:

I am sending two letters in connection with the proposed new fire regulations.

The first speaks in general terms in connection with the deficiencies of our present fire code development process under the control of the National Fire Protection Association. I have long considered the NFPA to be an operation behind which organizations marketing fire safety products promote codes that favor their own products.

In this letter I will comment about some features of your proposed regulations.

First I think the regulations are needed, and I believe they generally are well directed and to the point. I support the proposed regulations.

There are a few comments I'll make.

1. Portable Extinguishers and Standpipe and Hose Stations.

I believe existing fire extinguishers are inferior fire fighting tools. Instead of extinguishers, I favor small hose (5/8 to 1 inch size). Where necessary, nozzles should be rated for electric hazards. Hose sized 1 1/2 is too big for an amateur fire fighter (first aid), but it is a good hose for brigade use.

2. Fixed Suppression Systems for Cables.

Fixed suppression systems for cables should be automatic, not manual, and primary reliance should be placed on water spray. The

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"If it's not fire sprinklered — It's not fire safe."

"conventional" fire sprinkler system should not be used. Rather, special designed, high pressure, directional spray systems should be so engineered for penetration into stacked trays of cables. Dumping huge amounts of water with little penetration or effectiveness should be discouraged.

3. Fire Barriers

Fire barriers should not necessarily be 3 hour rated. They should be engineered for the fuel loading, sometimes being less, possible sometimes being more.

4. Water Supply Size

Fixed extinguishing systems using water should use higher pressure but less water and the total amount of water needed can be reduced. The water spray system should be a more precisely engineered system not requiring huge water supplies.

5. Automatic Fire Detection

A fire sprinkler system and/or automatic water spray system is a fire detection system as well. Installing a separate electric fire detection system in a sprinkler protected zone often will not be necessary.

6. Fire Prevention and Fire Brigade Training

I agree that comprehensive inspection and fire fighting programs should be established.

Very truly yours,

Richard M. Patton, F.P.E.-P.E.
President

RMP:jw

cc: David P. Notley
Robert L. Wright, Jr.

Enclosures