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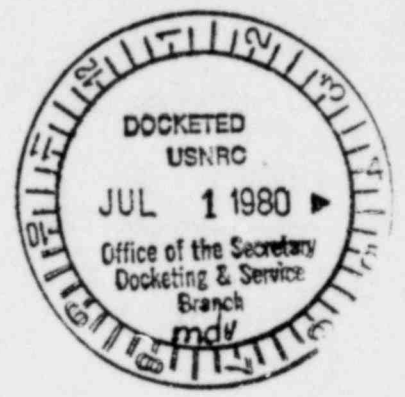
GAGE-BABCOCK & ASSOCIATES, INC.

CHICAGO OFFICE • 135 ADDISON AVENUE, ELMHURST, IL 60126 • (312) 530-1494

PAUL D. SMITH, P.E., President
BERT M. COHN, P.E., Senior Vice President

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File 7917-3

DOCKET NUMBER
PROPOSED RULE PR-50 (13)
(45 FR 36082)



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

Attn: Docketing & Service Branch

Gentlemen: Proposed Rule,
Appendix R, Fire Protection
Program for Nuclear Power
Facilities Operating Prior
to Jan. 1, 1979

While we do not wish to comment on the need of this proposed rule nor on the proposed deadlines, we have a few comments relating to the technical aspects of this rule, as follows:

1. The impact of this rule on plants which have already developed and are implementing an acceptable fire protection plan should be investigated. These new rules may force the provision of duplicate protection where an alternate, equivalent system of protection has been agreed to between the utility and NRC.
2. Section II, General Requirements, Part A, Paragraph 2f: With the lack of more specific guidance in Section III, this provision will allow the use of protective measures which are known by test and experience to provide less-than-adequate protection against exposure fires.
3. Section II, General Requirements, Part A, Paragraph 2g: This provision will now allow the fire separation between fire areas to be reduced to ½ hr. if no fire load is present at the time of the fire hazards analysis. This is contrary to generally accepted fire protection engineering practices and provides an inadequate margin of safety.

L-4-1, A.50

Acknowledged by card. LIDIC

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4. Section II, General Requirements, Part E: While this paragraph mandates consideration of both in situ and transient combustibles, other parts of this rule ignore the problem of transient combustibles. No further guidance is given for the treatment of transient combustibles, and provisions of this rule such as items 3 above and 5 below imply that transients can be ignored. This must be clarified.

There is a problem with writing a general requirement having something as specific as "three-hour rated fire barriers or at least 50 feet... of clear air space." While this may be satisfactory some of the time, such generalization is dangerous, and it does not allow for alternate, equivalent solutions.

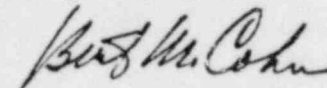
5. Table 1 to Section III, Specific Requirements, Part G, paragraph 2c: This table appears to need clarification and modification. The provisions for "in situ" and "exposure" are identical. Guidance should be given as to whether "exposure" refers to transient combustibles; it generally refers to a fire from any external source. If it does not refer to transients, then consideration of transients should be included.

The heading for the second column (Fire/Water Disables Normal Shutdown Capability) needs clarification. If it means "Either Fire or Water," the generalizations of this table appear to be adequate.

Both In-Situ and Exposure fires should be related to the severity of the fire which can be anticipated.

Note 2 of Table 1 provides inadequate protection against exposure fires from transient combustibles and appears to be in conflict with the paragraph referred to in 4 above which provides for a 50 ft. separation. The term "measures are provided to retard propagation" is meaningless and will tend to allow protective means which are ineffectual against the severity of fire which can reasonably be anticipated.

Very truly yours,



Bert M. Cohn, PE