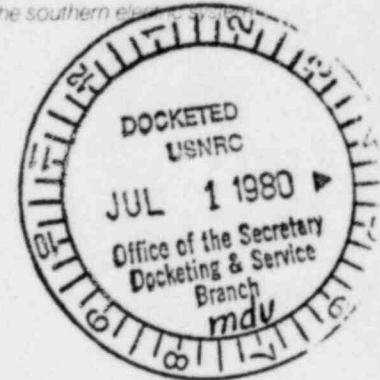


Corporate Insurance Department



June 27, 1980

DOCKET NUMBER **PR-50** <sup>(20)</sup>  
PROPOSED RULE  
**(45 FR 36082)**



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

Attention: Docketing and Service Branch

Re: Fire Protection for Nuclear Power Plants Operating  
Prior to January 1, 1979 - Proposed Rule

Dear Sir:

On May 29, 1980, the Commission published, in the Federal Register (45 FR 36082), a proposed rule on fire protection. Georgia Power has reviewed this document and offer the following comments:

1. We support in their entirety the comments submitted to you by the following groups: (1) the Edison Electric Institute, (2) the Atomic Industrial Forum and (3) KMC, Inc., a consulting firm for a group of utilities.
2. We strongly disagree with the need for the proposed rule. Since the Browns Ferry fire, the development of "proposed" Regulatory Guide 1.120, Branch Technical Position APCS 9.5-1 and its Appendix A, Georgia Power has worked extremely hard to meet and implement the criteria included in the applicable documents. The resolution of the few "open" items remaining are currently being actively pursued by the nuclear industry. If the staff wishes to close off all arguments and alternatives, we feel that it should be done by orders to individual plants, not by a rule making. This appears to be an example of over-reaction and penalizing the entire industry for the actions of a limited number of utilities. This brings me directly to our third comment.
3. The statement of consideration stated that "all licensees will be expected to meet the requirements of this rule, in its effective form, including whatever changes result from public comment."

Is this to say that all fire protection alternatives which have been agreed to by the staff, are now null and void? If so, this completely negates many years of hard work on alternative designs by qualified fire protection engineers. It must also be noted that these alternative designs had the blessings of the fire protection engineers serving as consultants to the NRC.

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We believe that in those cases where the staff has accepted the licensee's design or method of meeting a requirement, the issue should remain closed.

4. The proposed rule as written is overly specific. NRC rules, in general, specify the requirements to be met. The design and implementation of these requirements are the responsibility of the licensee to develop. In the rule, not only are the requirements set forth, but in many cases, the means of meeting those requirements is also specified.

5. If the rule is issued in its present form, there is no way Georgia Power will be able to meet the implementation schedule of November 1, 1980. The proposed rule sets forth new requirements not found in previous regulatory guides (for example, seismic design requirements for the reactor coolant pump lubrication oil collection system, fifty (50) feet both horizontal and vertical of clear air space between redundant systems if not separated by a three (3) hour fire barrier, testing of penetration seals with a pressure differential across it and requirements related to associated circuits.) There simply is not sufficient manpower to complete the design and installation of such new features as proposed within the stated time frame.

It is also doubtful that the commission's staff can identify all areas requiring new designs and/or installations prior to November 1, 1980.

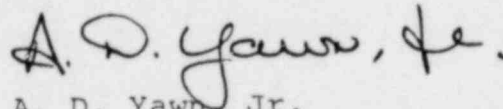
6. The proposed rule appears to require that fires be considered simultaneously with other accidents. Although all previously issued guidance states that fires need not be postulated to be concurrent with non-fire related failures in other systems, other plant accidents, or the most severe natural phenomena, this rule does not contain that definition and needs to be clarified to be consistent.

I hope that we have conveyed our deep concern over both the need for the rule and its affect on our plant. The cost to Georgia Power and other utilities in terms of lost generation while the required modifications are being made and the cost of the modifications themselves, will not be commensurate with the increase in fire protection. It is our understanding that over 95% of the NRC desired level of protection has either been made or the utility has agreed to make the change. If this is so, we certainly cannot see the benefit of such a rule at this late date.

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We respectfully ask that the commissioners evaluate our comments and those of the rest of the industry, and either withdraw the proposed rule or substantially modify it.

Yours very truly,

A handwritten signature in cursive script that reads "A. D. Yawn, Jr." The signature is written in dark ink and is positioned above the typed name.

A. D. Yawn, Jr.  
Sr. Fire Protection Engineer  
Corporate Insurance Department

ADYjr/aa