

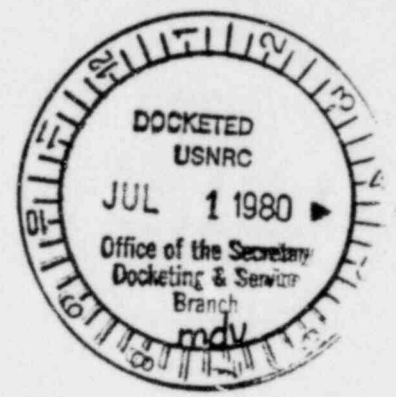
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DOCKET NUMBER
PROPOSED RULE PR-50 (14)
(45 FR 36082)



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

Attention: Docketing and Service Branch

Subject: 10 CFR Part 50 Proposed Rule
F.R. Vol. 45, No. 105
Minimum Provisions for Fire Protection in
Operating Nuclear Power Plants

Gentlemen:

This submittal is offered in response to the Commission's request for comments in re the above proceeding.

Overall, we believe that the Rule as proposed is a sound document, and represents a set of standards which, if properly implemented, should result in a very high level of fire safety at the facilities involved. We believe the Commission is to be congratulated for its work in this regard.

With regard to the fire suppression and control aspects of the Rule, we would offer only a general comment.

The guidelines laid down in Regulatory Guide 1.120 are heavily slanted toward the use of water for all fire protection problems. This appears to be the result of the failure of the NRC to recognize, especially in cases of cable fires, that other extinguishing agents can be used effectively, provided that the fire is not allowed to progress to the deep-seated stage. We believe the mandate for using water can only be justified on the premise that a deep-seated Class A fire results in all cases where cable insulation is involved. This seems to be a contradiction to the NRC's own philosophy of defense in depth, which recognizes prompt detection and extinguishment where fires do occur. It is suggested that the NRC should reconsider

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the adoption, at least in part, of the requirements laid down in NFPA Standard #803 - "Fire Protection for Nuclear Power Plants." Although this standard does not specifically address safety related items, there is no way in which those safety related systems can be effectively segregated from the balance of the plant and, therefore, it can be allowed that NFPA #803 does address de facto requirements for safety related systems.

Except as noted below, the proposed provisions in regard to fire brigade training are sound training standards that, if properly implemented, should reduce the potential for serious fire spread and contribute to a reduction of losses if a fire emergency occurs. The Commission is to be commended for its fine work in this area.

We believe that, as we interpret the terms, the provisions of Appendix R, Section III, Subsection I, 3. (Drills) Subparagraph (3) may be impractical to implement because to do so would require each plant to perform drills simulating fire fighting in all safety-related areas. Disagreement may be voiced over what is a safety-related area in a nuclear power plant. Many would contend that any area is a safety-related area. Thus the expense and time to simulate a fire in every conceivable plant location during a drill (at regular intervals not to exceed 3 months for each shift brigade) could be changed to read:

"(3) The simulated use of fire fighting equipment required to cope with the situation and type of fire selected for the drill. The area and type of fire chosen for the drill should differ from the previous drill such that brigade members are trained in fighting fires in various plant areas at each drill. The situation selected should simulate the size and arrangement of a fire which could reasonably occur in the area selected, allowing for fire development due to the time required to respond, to obtain equipment, and organize for the fire, assuming loss of automatic suppression capability."

We sincerely hope that these comments can be considered as constructive and helpful by the Commission.

Cordially,

THE ANSUL COMPANY



R. F. Sunstrom
Manager, Government and Industry Affairs

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