June 23, 1980

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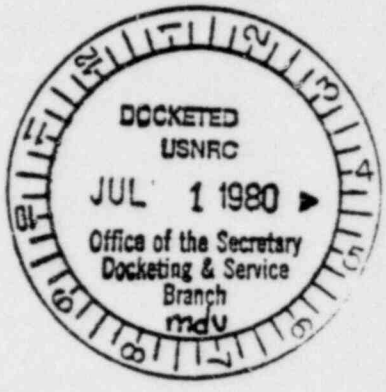
PROPOSED RULE PR-50 (19)
(45 FR 36082)

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

ATTENTION: Docketing Service Branch



M&M Protection Consultants

RE: PROPOSED RULE MAKING
10 CFR PART 50 APPENDIX R
FIRE PROTECTION PROGRAM FOR NUCLEAR POWER
FACILITIES OPERATING PRIOR TO JAN. 1, 1979

FEDERAL REGISTER, VOL. 45, No. 105, May 29, 1980
PAGES 36082 TO 36090

The attached is a summary of our comments on the above. Our concern is with the subjective nature of many of the requirements in this proposed rule making. In an effort to assist our nuclear clients, we feel that additional clarification is required. This facet takes on added significance in light of the staff's implementation date of November 1, 1980.

Very truly yours,

L. R. Hathaway

L. R. HATHAWAY
Manager, Public Utility Unit

LRH:pcm
Attachment
cc: David P. Notley
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Washington, D.C. 20555

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Acknowledged by card. 7/1/80

19.45

(1) II.A. Second paragraph: What criteria has the NRC established to evaluate the qualifications of those individuals responsible for fire protection?

(2) II.A. Fourth paragraph: What definition is being used for "fire area"?

(3) II.A. Fourth paragraph: We assume that the use of the word "safety" here and in other parts of the appendix are intended to refer to safe shutdown of the plant.

(4) II.A.1.b. How will this section on transient fire hazards be interpreted by the staff?

(5) II.A.2.c. Does manually actuated assume no redundant safety divisions in the areas of grouped electrical cable?

(6) II.A.2.f. What parameters will influence the "adequacy" of separation between redundant safe shutdown systems? How will "physical separation" be interpreted? What is a "local" fire barrier?

(7) II.A.2.g. What analysis method for determining fire loading is acceptable, (i.e. average BTU load, concentrated BTU load, heat release rate)?

(8) II.A.2.h. What criteria has the NRC established to evaluate the qualifications of the personnel required in this section?

(9) II.B. Does this imply that all fire pumps must be diesel engine driven or supplied from diesel generators?

(10) II.E. How is "clear air space" to be determined? Does this mean void of any combustibles that meet the NFPA definitions of "non-combustible" or "limited combustible"?

(11) III.A. Third paragraph: Are all suppression systems considered in determining water supply requirements (e.g. Turbine Building oil hazards)?

(12) III.F. Does this section only apply to areas containing both combustibles and safety related equipment, where the combustibles are not part of the safety related equipment?

(13) III.h.3. Will the phrase "emergency communications capability throughout the plant which are independent of the normal communication systems" be interpreted to exclude the existing fixed communication equipment and be replaced with two-way radio equipment, or will redundant hardline communication equipment be required?

(14) III.I.3.b. Is a shift a portion of one days time as opposed to a group of personnel?

(15) III.I.3.d. What criteria has the NRC established to evaluate the qualifications of those individuals who will witness fire brigade drills every year? What report format has the NRC set forth? Is it the intent to require that third party witnessing the test submit the required report to the NRC rather than through the licensee? What course of action is required by the licensee if the individual witnessing the drill submits a negative report? Is this one drill to be critiqued for each shift?

(16) III.K.8. Is it the intent of the NRC to include heavy timber (dunnage) which are not typically treated with fire retardant chemicals? Will the interpretation of "flame-retardant treated" include both interior and exterior grades of lumber? Are non-leaching type of fire retardants required?

(17) III.K.11. Does this section imply that strategies should be developed for all types of fires to be expected in every area of the plant? Would the failure to follow the pre-fire plan be considered a violation of Appendix R?

(18) III.K.12. How will areas be determined as presenting a hazard to safety related equipment?

(19) III.L. First paragraph: Can alternate shutdown capability include both non-safety related and non-safety related equipment?

(20) III.L. Second paragraph: Does Item (1) apply to all systems required to achieve hot standby conditions or a minimum of one system?

(21) III.L. Second paragraph: Is the "rupture of the containment boundary" to include the primary or secondary boundary?

(22) III.M. Second paragraph: The requirement for fire resistance equivalent to "metal lathe and plaster covering" implies that light rigid fireproofing material or those without lathe and plaster are unacceptable. How will the NRC interpret this requirement?

(23) III.M. Fourth paragraph: Will the NRC accept two 1-1/2 hour dampers in series as equivalent to one three-hour damper? Should the phrase in quotations read "fire door or damper(s)"

(24) III.N.1. Is the "same type of construction" intended to be the insulation, jacket, conductor and cable size? Should the word" representative" be included after "be"?

(25) III.N.2. What criteria has the NRC established for the "worst case"? In testing the penetration in the floor configuration and extrapolating for use in the wall configuration, how will the NRC judge the function of the supports and any deflection?

(26) III.N.5. The test is required to meet the "maximum pressure differential a fire barrier in the plant is expected to experience". What conditions are to be assumed - normal operating conditions or must smoke control, pressurization, fire or explosion conditions be included?

(27) III.N.6. Has the NRC established criteria on the location of thermocouples on the unexposed side of the fire barrier?

(28) III.N.8.a. As written, the three-hour requirement becomes overly restrictive if a test is being conducted to attain a fire resistance rating of less than 3 hours. Is it the intent of the NRC to require a 3-hour test in all cases?

(29) III.N.8.b. How will the NRC interpret "maximum temperature is sufficiently below the cable insulation temperature"?

(30) III.O.1. What locations, aside from the control room, can be considered continuously manned?

(31) III.O. Third paragraph: How is the fire brigade commander to respond to situations where there are electronic locks which fail in the locked position?

(32) III.O. Fourth paragraph: Does this imply that no automatic releases will be permitted?

(33)(34) III.P. First and Second paragraphs: What criteria applies to the drainage as a result of discharge from the fire protection system simultaneously with oil leakage?

(35) III.P. Sixth paragraph: Does this imply that the automatic (waterspray) and manual (hose stations) fire suppression systems must be designed to function in the event of a safe shut down earthquake? If this is required, can these systems be supplied from the fire water system which is not required to withstand a safe shut down earthquake?

(36) III.Q. Second paragraph: What is the rational in accepting IEEE 384-1974 for associated circuits and not all safe shutdown circuits?