



Public Service Company of Colorado

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T.F.R.A

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Fort St. Vrain
Unit No. 1
P-80200

Mr. Darrell G. Eisenhut, Director
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Reference: Section 50.48 and Appendix
R to 10 CFR Part 50

Dear Mr. Eisenhut:

PSC has reviewed the proposed rules in the above referenced document which was transmitted for comment.

PSC comments are as follows:

II. General Requirements

NRC proposed rule - "A.2.C Manually actuated fixed suppression systems shall be installed where fire hazards of grouped electrical cables are large or access for the fire brigade is restricted."

PSC comment - This requirement should be further defined to apply only to grouped cables whose loss could disable essential circuits and inhibit normal plant shutdown and core cooling capability.

NRC proposed rule - "E. Separation of redundant systems and components by three-hour rated fire barriers or at least 50 feet both horizontal and vertical of clear air space shall be deemed adequate."

PSC comment - It is inconsistent to require the same spacing of clear air space horizontally and vertically. A horizontal spacing of .0 feet is considered very extreme.

III. Specific Requirements

NRC proposed rule - G. Table 1 requires fixed suppression systems for all areas where access for manual fire fighting is poor.

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PSC comment - The definition of poor is not well defined, and it is recommended that the requirement apply only to areas where a fire could disable essential cables and inhibit normal shutdown and core cooling capability.

NRC proposed rule - "H. The brigade leader shall be competent to assess the potential safety consequences of a fire and advise control room personnel. Such competence by the brigade leader may be evidenced by possession of an operator's license or equivalent knowledge of plant safety systems."

PSC comment - The fire brigade leader should be considered qualified if he has undergone the required fire brigade training. Assessment of plant safety consequences should remain the responsibility of control room personnel in direct communication with the brigade leader.

NRC proposed rule - "I.1.b. The instruction shall be provided by qualified individuals who are knowledgeable, experienced, and suitably trained in fighting the types of fires that could occur in the plant and in using the types of equipment available in the nuclear power plant."

PSC comment - Any member of the fire brigade should be considered a qualified instructor.

NRC proposed rule - "I.1.d. Regular planned meetings shall be held at least every 3 months for all brigade members to review changes in the fire protection program and other subjects as necessary.

PSC comment - An acceptable alternate method to inform all brigade members of program changes is via a controlled distribution mailing to the individuals involved.

NRC proposed rule - "I.2. Practice sessions shall be held for each shift fire brigade on the proper method of fighting the various types of fires that could occur in a nuclear power plant. These sessions shall provide brigade members with experience in actual fire extinguishment and the use of emergency breathing apparatus under strenuous conditions encountered in fire fighting. These practice sessions shall be provided at least once per year for each fire brigade member.

PSC comment - It is not considered practical or necessary to practice fighting Class C (electrical) fires. Therefore, practice sessions limited to the extinguishment of Class A and B fires only should be considered adequate.

NRC proposed rule - "I.3.a,b. Fire brigade drills shall be performed in the plant so that the fire brigade can practice as a team.

Drills shall be performed at regular intervals not to exceed 3 months for each shift fire brigade. Each fire brigade member should participate in each drill, but must participate in at least two drills per year.

A sufficient number of these drills, but not less than one for each shift fire brigade per year, shall be unannounced to determine the firefighting readiness of the plant fire brigade, brigade leader, and fire protection systems and equipment. Persons planning and authorizing an unannounced drill shall assure that the responding shift fire brigade members are not aware of the time or location of the drill until it is begun. At least one drill per year shall be performed on a "back shift" for each shift fire brigade."

PSC comment - This requirement needs further definition since it appears to assume that each fire brigade always contains the same members, which would rarely be the case.

NRC proposed rule - "I.3.c. Unannounced drills shall be planned and critiqued by members of the management staff responsible for plant safety and security."

PSC comment - Since personnel responsible for plant safety and those responsible for security are two different organizations in many cases, the unannounced drills should be planned and critiqued only by the management staff responsible for plant safety.

NRC proposed rule - "I.3.d. At 3 year intervals, drills shall be critiqued by qualified individuals independent of the licensee's staff. A copy of the written report from such individuals shall be submitted to NRC for evaluation."

PSC comment - An acceptable alternative should be to retain those documents on file for audits and inspections by the NRC on site.

NRC proposed rule - "J. Emergency lighting shall be provided in all areas needed for operation of safe shutdown equipment and in access routes to all safety related areas and other areas presenting a fire hazard to safety related areas."

PSC comment - This requirement is ambiguous. It is unclear what is defined as an area presenting a fire hazard to safety related areas, and whether such an area needs emergency lighting or only the access route to the area needs the lighting. Safety related equipment which is not required for safe shutdown should not require emergency lighting.

NRC proposed rule - Section K.12. Administrative Controls, requires administrative procedures to define fire fighting strategies for all safety-related areas and areas presenting a hazard to safety-related equipment. These strategies shall include such items as: fire hazards in each area, best fire extinguishant for fire hazards in each area, most favorable direction from which to attack a fire, plant systems that should be managed to reduce damage potential, vital components to be kept cool, radiological and toxic hazards, etc.

PSC comment - These strategies are too detailed to define by procedures. The areas are continually changing which would invalidate the procedures, and even in an unchanging area, an infinite number of conditions could be experienced during a fire, making the writing of the procedures a futile effort. Administrative procedures should only define the general concepts of the fire program.

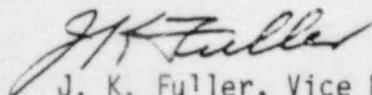
NRC proposed rule - "0. Fire doors shall be self-closing or provided with closing mechanisms and shall be inspected semi-annually to verify that automatic hold-open, release, and closing mechanisms and latches are operable. Fire doors shall be kept closed unless provided with automatic hold-open, release, and closing mechanisms.

One of the following measures shall also be provided:

1. Fire doors shall be electrically supervised at a continuously manned location; or
2. Fire doors shall be locked closed and inspected weekly to verify that the doors are in the closed position; or
3. Fire doors shall be provided with automatic hold-open and release mechanisms and inspected daily to verify that doorways are free of obstructions; or
4. Fire doors shall be kept closed and inspected daily to verify that they are in the closed position."

PSC comment - Frequent use of fire doors which are not electrically supervised precludes the need for daily or weekly inspection.

Very truly yours,



J. K. Fuller, Vice President
Engineering and Planning