

# Bechtel Power Corporation

Engineers - Constructors

Fifty Beale Street  
San Francisco, California

Mail Address: P. O. Box 3965, San Francisco, CA 94119

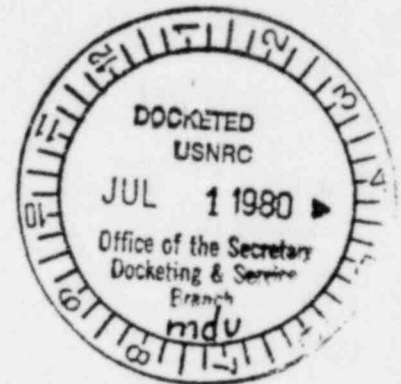


DOCKET NUMBER  
PROPOSED RULE

PR-50 (17)

(45 FR 36082)

June 27, 1980



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

Attention: Docketing and Service Branch

Reference: Proposed Section 50.48, Fire Protection,  
Volume 45 FR, No. 105, Page 36082

Dear Sir:

We have reviewed the proposed rule change and associated Appendix R "Fire Protection Program for Nuclear Power Facilities Operating Prior to January 1, 1979" and offer the following comments.

The Commission's desire to strengthen fire protection in existing nuclear power plants is recognized. However, we have serious concerns regarding the specific requirements in this proposed rule. Although there has been considerable dialogue concerning fire protection provisions between NRC and industry since the Brown's Ferry Fire, we believe that certain requirements in this rule have not previously been addressed in these discussions. Their impact on existing plants as well as their potential impact on new plants (if also applied to them) could be significant.

The arbitrary establishment of a 50-foot separation between redundant systems and components is a new requirement which appears to have no technical basis. Although the proposed rule allows for lesser distances based on and justified by analysis or test, there are no criteria given to indicate the nature of acceptable justification. In addition, it is noted that the 50-foot separation distance appears to be contradicted by the 10-foot distance identified in Footnote 2 of Table 1.

With regard to schedule, we share the concerns of Commissioners Hendrie and Kennedy that the implementation of changes, which may be necessary to comply with this rule, will conflict with required changes to meet

Task EM 915-1

L-4-2PT50

Acknowledged by card

L.D.C. 7/1/80

8007230042

June 27, 1980

Page Two

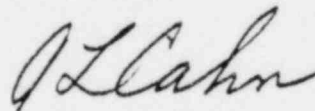
higher priority safety concerns such as those resulting from the Three Mile Island lessons and recent NRC Bulletins. There appears to be a real risk that some plants may be forced to shut down because they might not meet the required implementation schedules. We recommend that the Commission establish firm requirement dates only for the submittal of a plan to comply with the requirements and that the plans be accepted individually by the staff, based on the applicant's demonstration of a reasonable program for compliance. It appears, for example, that necessary analysis and possibly additional qualification testing may take substantially longer than the 6-month period required for full implementation of physical changes.

Since the Brown's Ferry Fire, many administrative and physical changes have been made on all nuclear power facilities. The augmented fire protection efforts on operating plants have been well documented and thoroughly reviewed and accepted by the Commission staff. The effectiveness of measures taken is clearly demonstrated by the significant reduction in the number and nature of plant fires. Therefore, it is not clear that there is an urgent, high priority need for additional changes to the fire protection programs and design features of existing operating plants. Nor do we believe that some of the requirements in this proposed regulation should be applied to new plants.

In addition to the above, the following are some specific changes that are recommended:

1. Delete the 50-foot separation rule and replace it with a requirement to determine acceptable separation by analysis or test. Possibly a 10-foot minimum as shown in Table 1 could be retained.
2. With regard to qualification of fire stops, delete Item III-N, 5. This requirement exceeds recognized acceptance criteria for fire barriers per ASTM 119, and we are not aware of fire barriers that have been qualified to this condition.

Sincerely,



A. L. Cahn  
Manager of Engineering  
Thermal Power Organization

ALC/sm