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Department of Nuclear Energy

May 6, 1980

Mr. Robert L. Ferguson
Chemical Engineering
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Bob:

On March 31, 1980 Mr. Townley, one of Brookhaven National Laboratory's manual fire fighting consultants, sent a letter to Mr. G. Lainas of the Division of Operating Reactors. The letter apparently reflected a telephone conversation between the two individuals on the subject of manual fire protection requirements. After reading Mr. Townley's letter, and not being privy to his conversation with Mr. Lainas, I called him in order to clarify some of his statements regarding fire protection adequacy.

Mr. Townley's clarification of his concerns, as discussed with me, are represented in the attached letter. I support Mr. Townley's conclusions that the implementation of our programs's specific recommendations will afford reasonable assurance of safe shutdown as related to fire protection. However, I also share his concerns that the licensee carry out all recommendations.

To this end, I suggest that the NRC staff review, in depth, the required audit procedures to guarantee full implementation. I am confident that once the SER and supplement requirements are implemented and verified, the adequacy of fire protection in nuclear power stations will be assured, within reason.

Respectfully yours,



Robert E. Hall, Group Leader
Reactor Engineering Analysis

REH:sd

attachment

cc.: V. Benaroya wo/att.
 W. Kato "
 M. Levine "
 J. Townley "

Acob
5/11

Fire Services Consultant

APR 5 1980

JOHN P. TOWNLEY
913 Southeast 15th Court
Deerfield Beach, Florida 33441
305/426-0335
May 2, 1980

Mr. Robert E. Hall, Group Leader
Reactor Engineering Analysis
Brookhaven National Laboratory
Upton, New York 11973

Dear Bob:

Pursuant to our recent telephone conversation and with reference to my letter of March 31, 1980 to Gus Lainas, of which you were copied, let me clarify my intent as follows.

Not being privy to my telephone conversation with Gus, I can understand that you might make a different interpretation of my letter than was intended.

Gus had called me to seek my advice regarding some questions he had been asked by a reporter concerning off site fire protection assistance for nuclear power plants. The line of the questioning evolved around the training, etc. of the off site fire companies, and brought out that the reporter was not too willing to accept the fact that the NRC could not regulate the local fire company and therefore could not require the local fire company's participation in fire protection preparedness for the nuclear plant. I was making the point that, should there be a serious fire incident, the press and the public would not be willing to accept such an answer to why the local fire companies were not better prepared. Therefore it is imperative that the NRC be assured that the nuclear plant fire brigade is adequately trained and equipped to provide reasonable fire control operations.

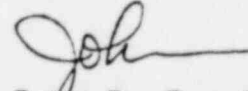
I am sure that the evaluation program and requirements that were made under the site visits and reviews are adequate to provide for reasonable fire control operations if all the requirements have been met by the utilities. The area of concern in my mind is that I do not think we can be sure the licensees have actually carried out the training, equipment purchases, additions to fixed suppression systems, etc., etc. they said they would do. Until such time as the NRC has seen that the licensees have in fact met all their commitments, this will

remain an area of concern to those of us who made the evaluations and recommendations.

I am confident that when each of the licensee's plants are in full compliance with the fire brigade requirements, and a review has shown this to be a fact, there will be no question regarding the adequacy of nuclear plant fire brigades.

I sincerely hope that I have clarified any misunderstanding my earlier letter might have created. If you wish further information, please advise.

Very truly yours,



John P. Townley

JPT/t