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Docket Number 50-346

License Number NPF-3

Serial Number 1722

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United States Nuclear Regulatory Commission  
Document Control Desk  
Washington, D. C. 20555

Subject: Appendix R Pressurizer Level Exemption Request Withdrawal and  
Protection of Containment Equipment.

Gentlemen:

Toledo Edison requested three exemptions from the requirements of 10CFR50, Appendix R by letter dated July 31, 1989 (Serial Number 1694). One of the exemption requests related to the lack of separation for the pressurizer level instrumentation. Subsequent to a verbal request from the NRC for additional information on the pressurizer level exemption request, Toledo Edison performed a walkdown and an additional engineering evaluation to assess the feasibility of performing a modification to comply with the 10CFR50 Appendix R separation requirements. Based upon the engineering evaluation, Toledo Edison has decided to withdraw the pressurizer level exemption request.

Toledo Edison will perform a modification to protect the electrical components associated with the pressurizer level channels in accordance with the requirements of 10CFR50 Appendix R. A 1/2 hour rated radiant energy shield will be installed around the electrical components inside containment including the transmitters, so that twenty feet of separation between the redundant instruments is attained. The steel instrument tubing for the pressurizer level transmitters does not meet the separation requirements but the tubing would not be adversely affected by the heat from a postulated fire in the area. The high pressure of the process fluid (approximately 2200 psi) combined with the low fire loading in the area of the tubing ensures pressurizer level instrument operability. Outside of the D-ring area, the routing of the tubing is at or below any cable trays and the tubing is protected from above by an impingement shield along the length of the tubing run. Furthermore, there is negligible combustible loading below the instrument tubing elevation outside the D-ring area based on walkdown observations, thereby precluding an exposure fire. In the D-ring area, the tubing enters the D-ring through a common penetration and then runs to the side of the pressurizer nearest the penetration. In the D-ring area, the

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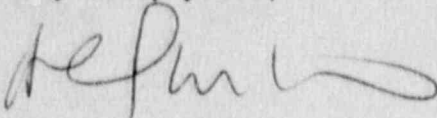
combustible load consists of the oil in the Reactor Coolant Pumps (RCP) and the cables for the pressurizer heaters. The cables for the pressurizer heaters are on the opposite side of the pressurizer from where the tubing attaches to the pressurizer. The lube oil that would leak from the RCPs is collected in the RCP motor oil drain tank which is spatially separated from and on the opposite side of the D-ring from the pressurizer (i.e., over twenty feet from the pressurizer). The NRC has reviewed the design of the oil collection systems and, as documented in the letter dated August 20, 1984 (Log Number 1586), considers the system to be adequate to prevent an exposure fire hazard.

Based on the above information, Toledo Edison has concluded that the exemption previously requested is not required to demonstrate compliance with 10CFR50 Appendix R.

Additionally, the commitment to provide a one-hour radiant energy shield inside the containment has been changed based upon NRC guidance. In the response to Question 43 in a letter dated May 27, 1987 (Serial 1361) Toledo Edison stated that the radiant energy shield protecting the Containment Air Cooler fans and the pressurizer level instruments in the Containment and Annulus would consist of a noncombustible material with a one-hour fire rating. Based on the NRC guidance provided in Generic Letter 86-10, Toledo Edison will provide a 1/2 hour fire rated radiant energy shield in lieu of the previously described one-hour fire rated radiant energy shield.

If you have any questions concerning this matter, please contact Mr. R. W. Schrauder, Nuclear Licensing Manager at (419) 249-2366.

Very truly yours,



DCW/ssg

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