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5.31.80.

PROPOSED RULE PR-50

(45 FR 36082)

Comments on Proposed Amendments
Federal Register Notice May 29, 1980
"FIRE PROTECTION" Part 50.



1. These amendments are in response to a fire at Browns Ferry 5 years ago.
"Justice delayed is justice denied." The minimum response to Browns Ferry should have been to close all nukes until these amendments were passed and implemented.
2. Why only 2 hours of fire fighting water when Browns Ferry was well over 2 hours of fire fighting? This requirement is only $\frac{2}{11} \times 100 = 18\%$ of what experience at Browns Ferry has shown to be needed.
3. "Special protective features" must include properly designed + separated "trays." Cabling must be suspended above floor of tray and holes must be cut in floor of tray.
4. No lines containing flammable liquids (hydraulic fluid, solvent, pneumatic oil-based fluid) may share tunnels with electrical cables.

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2.
5. The "fire brigade" shall have no other duties but fire fighting. They may not be janitors or other personnel. They must be well-trained in fire fighting and first aid.

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P.S. These are limited comments and they do not imply that there are no other problems with these amendments.