



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

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FYC

APR 11 1980

TO: TOM COMBS  
H-ST 1153  
FROM: LINDA ROBINSON  
4210 MBB  
FOR: YOUR DETERMINATION

NOTE TO: Darrell G. Eisenhut, Acting Director, Division of Operating Reactors

FROM: G. Lainas, Chief, Plant Systems Branch, Division of Operating Reactors

SUBJECT: RECENT DISCUSSIONS WITH COMMISSION STAFF RELATED TO PROPOSED APPENDIX R TO 10 CFR 50, FIRE PROTECTION

We met with the Commission staff on April 3, 1980 to discuss the status and implication of Appendix R. As a result of this meeting, we were requested to get some idea on the impact of requiring all fire protection features to be installed by November 1.

On April 8, 1980, the DRPM's conducted a telephone survey of all licensees to determine what the impact of a November 1, 1980 completion date for all fire protection modifications except Alternate Safe Shutdown Capability would be. In order to determine this, the licensees were asked the following questions:

1. Will you complete all the fire protection modifications required by both Section 3.1 Modifications and Section 3.2 Open Items of the fire protection safety evaluation report that the NRC issued for your plant by November 1, 1980, and if not, when?
2. Have you compared the requirements of the draft Appendix R which we sent to you in November 1979 with the requirements of the fire protection safety evaluation report for your plant and if so, can you meet the requirements for Appendix R except for alternate safe shutdown capability by November 1, 1980?

In response to the first question, the licensees of all but 11 plants stated that they would complete those modifications by November 1, 1980. Two of those eleven would be completed by December 31, 1980 and five more would be completed by June 1981. One stated they would need 12 months after our approval of their modifications which they have not yet received. One licensee with three plants has made no commitment until they see Appendix R as issued. Finally, one of the SEP plants has had some of their fire protection modifications in addition to alternate safe shutdown capability deferred until completion of the SEP.

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In response to the second question, 20 licensees had looked at the draft Appendix R sufficiently to compare the requirements and all of those licensees indicated that Appendix R requirements would require changes or additions to the modifications approved by the fire protection safety evaluation report.

On this basis, we informed George Sauter that the impact of Appendix R with a November 1, 1980 completion date was difficult to get by telephone and that the staff would estimate that at least 20 plants would not be able to meet the Appendix R requirements by November 1, 1980, excluding the alternate safe shutdown requirement. We also told him that the licensees that had looked at the first draft of Appendix R had indicated big problems with meeting it. We suspect that the reason is either misinterpretation of the Appendix R requirements or some new requirements that might be different from those given over the past three years in the fire protection SERs. We, therefore, recommended that Appendix R be published for comment.

On April 9, 1980, Tom Wambach called Tom Gibbon to correct an answer that he had given at the briefing for the Commissioners' staff members on April 3, 1980. He had told them that we had not approved any fire protection modification completion dates except for alternate Safe Shutdown Capability beyond October 1980. He called Tom Gibbon to inform him that the following completion dates were approved by the fire protection safety evaluation reports for the plants indicated:

1. R.E. Ginna - six items to complete by 6/81.
2. Turkey Point 3/4 - completion required 12/80.
3. Nine Mile Point - completion 1981 refueling outage (~5/81).
4. San Onofre Unit 1 - a number of items deferred to completion of SEP.

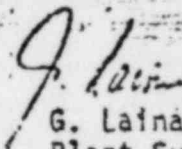
Tom Gibbon asked that we notify George Sauter and follow with a memorandum.

Tom Wambach and I called George Sauter and repeated the above information to him. He stated that a memorandum was not necessary. However, he did request the following:

1. the documentation which establishes the completion dates for the above four plants; and
2. the documentation that establishes the commitments for the plants that we indicated in the "Fire Protection Review Program Status" would complete alternate safe shutdown capability modifications by the end of December 1980 (category 2 plants).

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We answered that we could give him these two responses within a few days.



G. Lainas, Chief  
Plant Systems Branch  
Division of Operating Reactors

cc: ~~L.H.~~ George  
T. Wambach