

DUKE POWER COMPANY

POWER BUILDING

422 SOUTH CHURCH STREET, CHARLOTTE, N. C. 28242

WILLIAM O. PARKER, JR.  
VICE PRESIDENT  
STEAM PRODUCTION

January 9, 1981

TELEPHONE: AREA 704  
373-4083

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Attention: Mr. B. J. Youngblood, Chief  
Licensing Projects Branch No. 1

Re: McGuire Nuclear Station  
Docket Nos. 50-369, 50-370  
Fire Protection

Dear Mr. Denton:

The Nuclear Regulatory Commission has amended its regulations to require certain provisions for fire protection which will affect McGuire Nuclear Station. The purpose of this letter is to outline a proposed course of action and schedule for McGuire.

The NRC Staff indicated in the Supplementary Information published with the Final Fire Protection Rule in the Federal Register on November 19, 1980 that, in general, fire protection features previously reviewed against the criteria of Appendix A to BTP APCS 9.5-1 and approved in a subsequent Safety Evaluation Report (SER), provide an equivalent level of fire protection safety to that provided by the new Appendix R to 10CFR50. Since there were no unresolved issues noted in the McGuire fire protection SER (issued as part of Supplement No. 2 to the McGuire SER in March, 1979, it was concluded that the McGuire fire protection features are sufficient as they currently exist. However, the NRC Staff further specified in the new fire protection rule three items which must be backfitted regardless of the results of previous reviews. These items are III.G, Fire Protection of Safe Shutdown Capability; III.J, Emergency Lighting; and III.O, Oil Collection System for Reactor Coolant Pump.

From our review of each of the three backfit items contained in the new fire protection rule, we have concluded the following:

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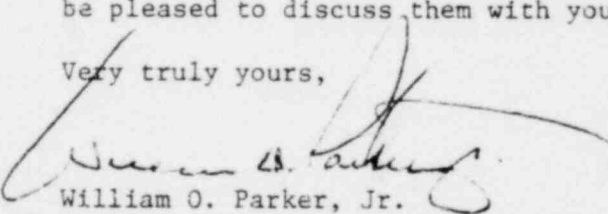
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1. Section III.G. Duke has previously committed to the utilization of a dedicated shutdown system to assure shutdown capability during certain postulated fire events (see William O. Parker letter of January 31, 1979 to Harold R. Denton). However, additional analysis of this system is required in accordance with Section III.G to determine if modifications are necessary.
2. Section III.J. The McGuire emergency lighting design currently conforms to the requirements of this section.
3. Section III.O. The previous commitment was to provide an oil collection system and final suppression system for the Reactor Coolant Pump (RCP) motor. These systems have been installed. However, as a result of the new rule, the RCP oil collection system and associated drainage system will require additional analysis and possible hardware modifications for compliance. We are currently working with the RCP vendor on this analysis.

Based on the above discussion, it can be seen that two of the three backfit items may require hardware changes. We have begun the requisite work to determine what modifications are required. It is our intent to pursue these items such that all required changes would be complete consistent with the schedule for completion of the Standby Shutdown Facility, i.e., three months after the first refueling of Unit 1 but not later than 24 months after initial fuel loading of Unit 1.

It is recognized that schedule requirements for implementation of these backfit items will be specified in the McGuire Operating License. We believe that the above schedule is reasonable and achievable. It is requested that the NRC Staff consider this proposed schedule for inclusion as a license condition in the McGuire operating license for Unit 1. These items will be reviewed and factored into the Unit 2 construction schedule, as appropriate. If there are any questions regarding this matter, we would be pleased to discuss them with you.

Very truly yours,



William O. Parker, Jr.

GAC:scs

cc: Mr. J. P. O'Reilly, Director  
U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, Suite 3100  
Atlanta, Georgia 30303

Mr. T. J. Donat  
Senior Resident Inspector  
McGuire Nuclear Station