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Dalwyn R. Davidson VICE PRESIDENT SYSTEM ENGINEERING AND CONSTRUCTION

June 18, 1981



Mr. Robert L. Tedesco Assistant Director for Licensing Division of Licensing U. S. Nuclear Regulatory Commission Washington, D.C. 20555

Dear Mr. Tedesco:

Perry Nuclear Power Plant Docket Nos. 50-440; 50-441 Fire Protection

In a letter dated April 3, 1981, we indicated that additional information on fire protection would be provided before June 19, 1981. After further assessment of the scope of the response to these Appendix R requirements, we find that the information you requested cannot be submitted as previously stated. The detailed tabulations required by your March 20, 1981 letter are being compiled and, therefore, we need to know a realistic date for the start of your fire protection review. The information could be provided as various phases are completed, if necessary, to support your needs. We will contact you to coordinate our submittal consistent with your review schedule.

As a summary of our response to the requirements on separation of cabling for safe shutdown systems, we offer the following information:

The Perry Project philosophy with regard to electrical separation criteria is based on IEEE Standard 384-1974, as modified by Regulatory Guide 1.75. Class IE cables and equipment for redundant divisions are routed in safetyrelated raceways which are separated in accordance with the criteria of this standard. Guidelines for separation between Class LE and non-class LE circuits and equipment are the same as redundant Class LE. Associated circuits are identified and physically separated as Class IE, as specified in IEEE 384-1974. Electrical cables are type tested in accordance with the requirements of IEEE Standard 383-1974 and certified to be of fire retardant construction.

Finally, the methodology employed in the Perry fire hazards analysis is described in Section 2.0 of the Fire Protection Evaluation Report with

additional discussion on the design bases for a Class IE power system in Table 8.1-2 of the FSAR.

If you have any problems with the revised schedule, please let us know.

Very truly yours,

Dalwy R. Davidson Vice President

System Engineering and Construct on

DRD: dlp

cc: G. Charnoff

D. Hauser

J. Hughes, NRC Resident Inspector