

November 18, 1980

Mr. J.M. Felton, Director
Division of Rules and Records
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

FREEDOM OF INFORMATION
ACT REQUEST

FOIA-80-566

REC'D 11-19-80

Re: Freedom of Information Act Request

Dear Mr. Felton:

On November 17, 1980, the Commission issued its final rule on "Fire Protection Program for Operating Nuclear Power Plants." Among other things, the rule establishes an Appendix R to 10 C.F.R. Part 50, which consists of various fire protection requirements.

Pursuant to the Freedom of Information Act, Debevoise & Liberman requests copies of the following:

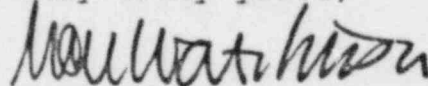
1. Records containing the technical basis, rationale, and justification for the 20-foot separation criteria of Appendix R III.G.2.b and d (final rule pp. 50-51).
2. Records containing data regarding or analyses of alternative separation distances of less than 20 feet, including the comparability of such lesser distances to the level of safety provided by the 20-foot separation standard of Appendix R III.G.2.
3. Records containing data regarding or analyses of other alternatives to the fire protection requirements of Appendix R III.G.2.

Mr. J.M. Felton, Director
November 18, 1980
Page 2

4. With respect to operating nuclear power plants generally and with regard to specifically identifiable operating plants, records identifying the current extent of conformance to the requirements of Appendix R III.G.2. Generally or with respect to specific plants, also provide records reflecting extent of effort by licensees, capital costs, occupational radiation exposures and additional duration of outages necessary to implement the requirements of Appendix R III.G.2.
5. Records containing assessments of the incremental societal value that would accrue by compliance with the requirements of Appendix R III.G.2 by the elimination of a portion of the residual risk remaining after compliance with the requirements imposed by the Staff pursuant to BTP 9.5-1, Appendix R.
6. Records containing assessments of the potential degradation of the public health and safety, or any other adverse safety implication, to result from literal compliance with the requirements of Appendix R III.G.2.

We request that these records be provided with all possible speed, and in no event later than the 10 working days specified by 10 C.F.R. §9.8.

Very truly yours,



McNeill Watkins II