

Docket 70-36
License SNM-33

MAY 04 1994

Mr. Robert W. Sharkey, Manager
Regulatory Compliance
Hematite Nuclear Fuel Manufacturing
Combustion Engineering, Inc.
P.O. Box 107
Hematite, MO 63047

Dear Mr. Sharkey:

SUBJECT: FIRE SAFETY REVIEW FOR LICENSE RENEWAL (TAC NO. L21637)

This refers to your letter dated March 28, 1994, responding to our letter dated February 9, 1994, concerning the fire protection program at the Hematite facility.

Our review of your response has identified that additional information, as specified in the enclosed, must be provided. The information should be provided within 30 days of the date of this letter. Please reference the above TAC No. in future correspondence related to this subject.

If you have any questions regarding this matter, please contact me at (301) 504-2604.

Sincerely,

ORIGINAL SIGNED BY

Sean Soong
Licensing Section 2
Licensing Branch
Division of Fuel Cycle Safety
and Safeguards, NMSS

Enclosure: As stated

cc w/encls:
Mr. J. F. Conant, Manager
Nuclear Materials Licensing

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REQUEST FOR ADDITIONAL INFORMATION
FIRE PROTECTION PROGRAM REVIEW
COMBUSTION ENGINEERING HEMATITE FACILITY

This Request for Additional Information (RAI) is based upon a response from the licensee dated March 28, 1994 which responded to questions from the NRC transmitted by letter dated February 9, 1994. The earlier questions were a result of a review of the License Renewal submittal and a site visit on January 4-5, 1994.

1. The March 28, 1994 letter stated that a pre-fire plan is "scheduled for completion in about six months and would be available for review at the site."

A pre-fire plan is a key emergency response document which defines what actions will be taken to mitigate anticipated fire scenarios. The pre-fire plan also provides important information with respect to coordinating plant fire fighting activities with off-site fire fighting response organizations. The pre-fire is also necessary to clearly define what areas of the plant are water exclusion areas and what alternative means of fire suppression should be used. If large carbon dioxide extinguishers are to be used in lieu of water, the pre-fire plan should clearly address the safety issues related to carbon dioxide. (Proper training must also be provided.)

The NRC Safety Evaluation Report (SER) for the license renewal will require that a pre-fire plan be submitted to the NRC by October 1, 1994. The SER will also state that acceptability of the fire protection program will be contingent upon an adequate pre-fire plan coupled with appropriate training by site personnel and off-site response agencies.

2. A concern was raised in the RAI regarding multiple locations where the fire alarms can be acknowledged and silenced. The licensee's response stated that "... it is unlikely that a trouble condition would go unnoticed. it is also unlikely that an alarm condition would go unnoticed..." No specific procedures nor responsibilities were provided with the response. Section 10.2 of the NRC guidance states that "The Pre-fire Plan should assign individual and alternate responsibilities for responding to a fire alarm or call..." The pre-fire plan, which is to be completed as discussed in item 1 above, should define the role of individuals acknowledging and silencing alarms and should clearly address multiple alarm enunciator locations.
3. The March 28, 1994 response stated "The use of facility-installed fire hoses is being reviewed... if for no other reason, the hoses are available for use by off-site fire response personnel." It is expected that the completed pre-fire plan will address the use of these hoses. It should be noted that many fire departments will not use installed fire hoses because they are not aware of the quality and condition of the hose.

4. Information was requested in the February 9, 1994 RAI regarding location and spacing of plant smoke detectors. The licensee response stated that smoke detector spacing will be addressed in the pre-fire plan. While it is prudent to show smoke detector locations in the pre-fire plan, the intent of the question was to address the adequacy of smoke detection within the facility. However, the licensee also stated in their response that a fire hazards analysis would be addressed as part of its license renewal commitment (Part 1 Section 1.6(g)). It would be expected that assessing the adequacy of early warning fire detection would be included in the fire hazards analysis and therefore review of this issue will be performed in conjunction with review of the fire hazards analysis.
5. Information was requested in the February 9, 1994 RAI about shut-off valves for the ammonia crackers. Information was also requested about testing procedures for these valves. The March 28, 1994 licensee response stated that automatic shut-off valves are provided in the supply to the crackers. However, no information was provided regarding the testing of these valves. Automatic valves which perform a safety function must be periodically tested to insure their operability. Please provide testing procedures along with testing frequencies for these shut-off valves.
6. The licensee response stated "increased management attention to housekeeping needs is being given." However, no specific procedures or policies were provided. Section III.1 of the NRC guidance states that the fire protection program should include "rules for good housekeeping with a view to minimizing fire damage." While management attention is crucial to an effective fire safety program, specific guidance must be provided to employees regarding combustible control and proper handling and storage of flammable liquids and gases. During the January 4-5, 1994 site visit, it was apparent that employees did not understand adequate combustible control practices. Please provide written procedures for controlling combustible material and flammable liquids and gases.