

# PHILADELPHIA ELECTRIC COMPANY

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March 24, 1983

Docket Nos. 50-277  
50-278

Mr. J. F. Stolz, Chief  
Operating Reactors Branch #4  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

SUBJECT: Peach Bottom Atomic Power Station  
Fire Protection Open Items

Dear Mr. Stolz:

This letter identifies the correspondence providing Philadelphia Electric Company's response to unresolved items discussed in a November 24, 1980 letter from the NRC (D. G. Eisenhut to All Power Reactor Licensees with Plants Licensed prior to January 1, 1979). The need for this letter was indicated during a telephone conversation on February 1, 1983 with the NRC staff reviewing Appendix R compliance. Additionally, the letter provides additional information regarding the installation of fire detectors to meet 10 CFR 50, Appendix R, and requests an exemption to the fire detection requirement of 10CFR 50, Appendix R, Section III.F for one area of the plant.

The November 24, 1980 letter referenced above inferred that compliance with the requirements of Appendix R would provide resolution of the unresolved items. Subsequently, we provided written responses to all of the Appendix R requirements. However, we neglected to clearly reference the NRC Safety Evaluation Report item number specified in the November 24, 1980 letter. The following information should assist the staff in identifying the appropriate Philadelphia Electric Company response to each unresolved item.

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3.1.1(4) Smoke Detectors - Refueling Floor

The staff requires smoke detectors on the refueling floor to meet Section III.F of Appendix R. PECO's letter of March 20, 1981 (S. L. Daltroff to D. G. Eisenhut) committed to the installation of smoke detectors that meet the requirements of Section III.F. The modification includes two smoke detectors in the vicinity of the only safety related system on the refueling floor; i.e., ventilation stack radiation monitoring station. This modification was approved in Amendments No. 85 and No. 84 (issued June 16, 1982) to the Technical Specifications of Peach Bottom Unit 2 and Unit 3, respectively. Implementation of the smoke detector modification has been completed.

3.1.7 Fire Barrier Penetration Seals

3.2.8(2) Electrical Penetration Seals

The staff requires fire barrier penetration seals that meet Section III.M of Appendix R, for cable penetration seals. We committed to the requirements of Section III.M in the March 20, 1981 letter referenced above. By letter dated October 14, 1981 (J. W. Gallagher, PECO. to D. G. Eisenhut) we reaffirmed our commitment to meet Section III.M, and committed to upgrade fire barrier penetrations between redundant safe shutdown systems to meet or provide equipment protection to the requirements of Appendix R, Section III.G. Additionally, the letter requested an implementation schedule of March 1, 1984. The NRC approved this commitment by letter dated February 4, 1982 (J. F. Stolz, NRC to E. G. Bauer, Jr., PECO.).

Recent meetings with the NRC have resulted in our re-evaluating our position with regard to this matter. This subject will be further addressed in correspondence to Mr. D. G. Eisenhut concerning fire protection modifications and exemptions, planned for March 28, 1983.

3.1.14 Administrative Controls

The staff requires compliance with the fire brigade training provisions of Section III.I of Appendix R, and with the administrative controls of Section III.K of Appendix R. The March 20, 1981 letter committed us to meeting Section III.I and III.K, and we have taken the necessary steps to comply with these sections.

### 3.2.2 Cable Separation

This item involves compliance with the cable separation criteria of Appendix R, Section III.G. The extent of compliance, as well as requests for exemptions, were provided in the document titled "Safe Shutdown Report", transmitted under cover letter dated June 28, 1982 (S. L. Daltroff to D. G. Eisenhut). By letter dated January 20, 1983, the NRC informed us that our exemption request did not contain sufficient information for the staff to make a determination as to its merit. We plan to submit another exemption request in accordance with a schedule to be submitted within two weeks of the date of this letter, and based on the installation of alternative shutdown systems.

### 3.2.3(1)(a), (1)(c), (1)(d), (4) Fire Detector Systems

The March 20, 1981 letter, previously referenced, committed to the installation of smoke detectors in all areas of the plant that contain or present an exposure fire hazard to safe shutdown or safety related systems as required by Section III.F of Appendix R. All areas identified in 3.2.3.(1)(a), (1)(c), (1)(d), (4) of your Safety Evaluation Report were provided with smoke detection systems except for fire areas 20, 21, 29, 30 and enclosed panels in the control room which contain redundant channels.

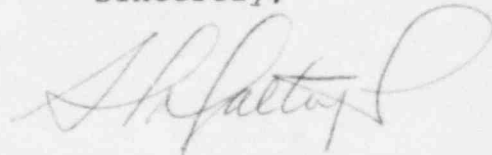
The control room panels are internally divided into sub-compartments in such a manner to provide segregation of the two primary shutdown systems. Therefore, a panel fire cannot result in the loss of shutdown capability. The panel partitions are sufficient to withstand the heat flux that could be generated by the combustible loading within the panel. In addition, continuous manning of the control room assures prompt detection and suppression of control room fires. For these reasons, fire detection within the control room panel does not appear to be required by the provisions of Appendix R, Section III.F.

Fire areas 20 and 30 represent the neutron monitoring equipment room. Neither of these zones contain safe shutdown components, and therefore do not require fire detection per Section III.F.

Areas 21 and 29 represent the Unit 2 and Unit 3 Main Steam Isolation Valve Rooms respectively. These areas are void of combustibles (all of the electrical cable is routed in conduits), and are inaccessible at power due to the radiation and temperature environment. In order to avoid the need to install smoke detectors in these areas, a third safe shutdown method which is completely isolated from area 21 and 29 was identified and is described on page 3-1 of the June 28, 1982 Safe Shutdown Report (S. L. Daltroff to D. G. Eisenhut). For these reasons, we request, pursuant to Section 50.12 of the Commission's regulations, an exemption to the requirement of 10CFR 50, Appendix R, Section III.F to have automatic fire detection in the Main Steam Isolation Valve rooms.

Should you have any questions regarding this matter, please do not hesitate to contact us.

Sincerely,

A handwritten signature in cursive script, appearing to read "S. L. Daltroff".

cc: Site Inspector  
Peach Bottom