



June 3, 1994
ML-94-026

Docket No. 70-36
License No. SNM-33

Dr. Sean Soong
Licensing Branch
Division of Fuel Cycle Safety and Safeguards
Office of Nuclear Materials Safety and Safeguards
U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Subject: **Additional Information Concerning Fire Safety Review (TAC No. L21637)**

Reference: Letter, S. Soong (NRC) to R. W. Sharkey (C-E), dated May 4, 1994

Dear Dr. Soong:

The Reference letter requested additional information concerning the fire protection program at the Hematite facility. This letter provides a response to that request.

Enclosure I responds to the request for information.

If there are any questions or comments concerning this matter, please do not hesitate to contact me or Mark Michelsen of my staff at 203-285-5261.

Very truly yours,

COMBUSTION ENGINEERING, INC.

Robert W. Sharkey
Manager
Regulatory Compliance

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Enclosure I to
ML-94-026

COMBUSTION ENGINEERING, INC.
HEMATITE NUCLEAR FUEL MANUFACTURING FACILITY
ADDITIONAL INFORMATION CONCERNING
FIRE PROTECTION PROGRAM

June 1994

**COMBUSTION ENGINEERING, INC.
HEMATITE NUCLEAR FUEL MANUFACTURING FACILITY
ADDITIONAL INFORMATION CONCERNING
FIRE PROTECTION PROGRAM**

In a letter dated May 4, 1994, the NRC requested additional information concerning the fire protection program at the Hematite facility. The following responds to the NRC comments. Please refer to the NRC letter for the complete text of the comments.

1. Comment: Submit Pre-fire Plan

Response: An informational copy of the Pre-fire Plan will be submitted by October 1, 1994.

2. Comment: The Pre-fire Plan should define the role of individuals acknowledging and silencing alarms and should clearly address multiple alarm annunciator locations.

Response: The Pre-fire Plan will include this information.

3. Comment: The Pre-fire Plan should address the use of facility-installed fire hoses.

Response: The Pre-fire Plan will include this information.

4. Comment: 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.

Response: The NRC's comment is duly noted.

5. Comment: Provide testing procedures along with testing frequencies for the ammonia cracker automatic shut-off valves.

Response: The ammonia system has recently been evaluated against the Occupational Safety and Health Administration (OSHA) Process Safety Management Standard. This rigorous review by the process

hazards evaluation team resulted in several recommendations. The recommendations of the team are currently in the process of being evaluated and implemented. One of the recommendations of the team is to test the automatic ammonia shut-off valves annually for each mode of automatic operation: power loss, under-pressure, and over-pressure.

6. Comment: Provide written procedures for controlling combustible material and flammable liquids and gasses.

Response: When appropriate, precautionary statements are included in Operations Sheets for control of flammable materials. However, a separate and distinct procedure for control of flammable materials does not exist. The intent of this comment is appropriately considered during the fire hazards analysis.