#### SOUTH CAROLINA ELECTRIC & GI.S COMPANY

POST OFFICE 764 COLUMBIA, SOUTH CAROLINA 29218

December 1, 1982

O. W. DIXON, JR. VICE PRESIDENT NUCLEAR OPERATIONS

\*

Mr. Harold R. Denton, Director Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Washington, DC 20555

> Subject: Virgil C. Summer Nuclear Station Docket No. 50/395 Operating License No. 50/395 Fire Protection

Dear Mr. Denton:

In our October 8, 1982 letter, South Carolina Electric & Gas Company (SCE&G) requested an amendment to the Operating License and Technical Specifications. Details were provided in attachments to that letter. Attachment II provided requested changes regarding fire protection. It has been discovered that one of the changes we proposed to make was mistakenly left out of that attachment. That information is provided as an attachment to this letter. Please add it to Attachment II of the October 8, 1982 letter.

If you have any questions, please let us know.

Sincerely yours,

O. W. Dixon,

RBC:OWD/fjc Attachments: cc: V. C. Summer G. H. Fischer H. N. Cyrus T. C. Nichols, Jr O. W. Dixon, Jr. M. B. Whitaker, Jr. J. P. O'Reilly H. T. Babb D. A. Nauman C. L. Ligon (NSRC) W. A. Williams, Jr.

R. B. Clary O. S. Bradham A. R. Koon M. N. Browne G. J. Braddick J. L. Skolds J. B. Knotts B. A. Bursey NPCF File

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#### FIRE PROTECTION

The Virgil C. Summer Nuclear Station Fire Protection program was initially established on the basis of the requirement of Appendix A to NRC Branch Technical Position APCSB 9.5.1. In accordance with these requirements, a fire hazards analysis was prepared and a point by point comparison was made between Appendix A requirements and SCE&G commitments. This was submitted to the NRC as the Fire Protection Evaluation Report (FPER). A period of question and answer followed during which SCE&G came to agreement with the NRC on all points and revisions were made to the FPER as required.

Subsequently, 10CFR50 Appendix R was issued and after review and evaluation, the NRC issued the Virgil C. Summer Nuclear Station Safety Evaluation Report (SER) showing certain additional fire suppression systems that would result from implementation of Appendix R. As published, Appendix R did not apply to the Virgil C. Summer Nuclear Station because it was not "operating prior to January 1, 1979". The NRC asked SCE&G to commit to meet Appendix R, section ITT G, J and O only. SCE&G did so in our letter to Mr. Denton dated April 20, 1981, (attached) with deviations therefrom to be resolved in a manner acceptable to the NRC Staff.

In our letter of June 1, 1981 (attached) addressed to Mr. Denton, SCE&G requested exemption from certain requirements of Appendix R based upon alternative actions taken in accordance with agreements which had previously been reached with the NRC. On July 7, 1981, representatives of SCE&G met with the NRC Staff to discuss these exemptions and other issues pertaining to fire protection. Confirmation of agreements reached during this meeting, along with additional information pertaining to the Appendix R exemptions, were provided in letters to Mr. Denton dated July 16 and August 21, 1981 (attached). Subsequently, the NRC issued Supplement 3 to the SER which included a final list of all the areas agreed upon, where fire suppression systems would be required. The plant is currently in full compliance with the commitments contained in Supplement 3.

Due to the choice of words found in supplement No. 4 to the SER and in the licensing conditions, the status of this issue is unclear. Specifically, the words in question in the licensing conditions are ".... SCE&G shall maintain the fire protection program set forth in Appendix R to 10CFR Part 50, except for the following:

.....

Fire Protection Page #2

(111) No automatic fire suppression systems are required in the areas listed in Supplement No. 4 to the SER

...."

Supplement No. 4 to the SER lists those areas with deviations from Appendix R which had been included in the SER and then deleted in Supplement No. 3. However, this list does not inlcude all areas affected by the Appendix R requirement.

This ambiguity has been discussed with the Project Manager and the following proposed revision to item (18)a(iii) of the licensing conditions is provided to resolve this issue:

"No automatic fire suppression is provided in the areas shown on the attached table."

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| BLDG. &<br>Elev. | R 0 0 M | SAFE SHUTDOWN<br>SYSTEMS PRESENT | LOCATION OF<br>REDUNDANT SAFE<br>SHUTDOWN SYS. | DE TE C T I O N<br>I N S T A L L E D | AREA OR ZONE<br>FIRE LOADING<br>BTU/FT <sup>2</sup> ** | REMARKS      |
|------------------|---------|----------------------------------|--|--------------------------------------|--|--------------|
| AB 374'          | 74-01   | (B) CS Piping                    | 00-01E   | Yes                                  | 7200   |              |
|                  | 74-05   | SP Line from RWST_               | 63-03  | No                                   |  |              |
|                  | 74-07   | SP Line from RWST                | Same Area                                      | Yes                                  |  |              |
|                  | 74-08   | A&B Tray and CND                 |  | Yes                                  |  |              |
|                  | 74-09 * | A VU Piping                      |  | Yes                                  |  |              |
|                  |         | A&B Ducts from                   |  |                                      |  |              |
|                  |         | RHR rm Vent                      |  |                                      |  |              |
|                  |         | A&B CC Lines                     |  |                                      |  |              |
|                  |         |                                  |  |                                      |  |              |
|                  | 74-16   | "B" RHR Pump,                    | 74-17  | Yes                                  |  |              |
|                  |         | B Tray & CND                     |  |                                      |  |              |
|                  | 74-17   | "A" RHR Pump,                    | 74-16  | Yes                                  | *  |              |
|                  |         | A Tray & CND                     |  |                                      |  |              |
| AB 385'          | 85-01   | A VU Piping,                     | 85-02  | Yes                                  |  | Exempt SER 4 |
|                  |         | ACND                             |  |                                      |  |              |
|                  |         | A XAH-4A-VL                      |  |                                      |  |              |
| "                | 85-02   | B VU Piping,                     | 85-01  | Yes                                  |  |              |
|                  |         | BCND                             |  |                                      |  |              |
|                  |         | B XAH-4B-VL                      |  |                                      |  |              |
| AB 388'          | 88-05   | SP Line to RWST,                 | Same Area                                      | Yes                                  | 11,900   |              |
|                  | 88-13   | A CND & Tray,                    |  |                                      |  |              |
|                  | 88-13N  | B CND & Tray,                    |  |                                      |  |              |
|                  | 88-135  | C CND                            |  |                                      |  |              |
|                  | 88-13NE |                                  |  |                                      |  |              |
|                  | 88-16   |                                  |  |                                      |  |              |
|                  | 00-01   |                                  |  |                                      |  |              |
| H                | 00-01W  |                                  |  |                                      |  |              |
|                  |         |                                  |  |                                      |  |              |

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| BLDG. &  |  | SAFE SHUTDOWN   | LOCATION OF<br>REDUNDANT SAFE | DETECTION | AREA OR ZONE<br>FIRE LOADING | REMARKS                    |
|----------|--|---|-------------------------------|-----------|------------------------------|----------------------------|
| ELEV.    | ROOM                                     | SYSTEMS PRESENT   | SHUTDOWN SYS.                 | INSTALLED | BTU/FT <sup>2</sup> **       |                            |
| A6 388'  | 88-23                                    | B Chargine Pump,<br>B CND   | 88-24 & 25                    | Yes       | 11,900                       |                            |
| и        | 88-24                                    | C Charging Pump,<br>C CND   | 88-23 & 25                    | Yes       |                              |                            |
|          | 88-25                                    | A Charging Pump,<br>A CND   | 88-24 & 23                    | Yes       | *                            | Exempt SER 4               |
| AB 397 ' | 97-01                                    | "A" Iray  | 97-02N                        | Yes       | 2,100                        |                            |
| :        | 97 - 02<br>97 - 02 N<br>97 - <u>02 S</u> | A&B RHR & S1<br>Lines, A&B Trays,<br>A&B MO Valves,<br>A&B VU&CC Piping | Same Area                     | Yes       |                              | Room 97-02<br>Exempt SER 4 |
| AB 400'  | 00-01E                                   | A,B, &C CS Piping,<br>A SI Piping                                       | Same Room                     | Yes       | *                            |                            |
|          | 00-02E                                   | B-CS piping<br>A&B VU Piping,<br>XAH-1A,1B,2-VL,<br>A,B,C CND, B Tray   | Same Room                     | Yes       |                              | Room 00-02<br>Exempt SER 4 |
| AB 412'  | 12-02                                    | SP-Pipe   | 74-07, 74-08                  | Yes       | 29,200                       |                            |
| n        | 12-03A                                   | A&D CND   | Same Room                     | Yes       |                              |                            |
|          | 12-04                                    | A&D CND, LT-990,<br>RWST  | Same Room                     | No        |                              |                            |

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|            |          |                     | LOCATION OF          |           | AREA OR ZONE           | REMARKS      |
|------------|----------|---------------------|----------------------|-----------|------------------------|--------------|
| BLDG. &    |          | SAFE SHUTDOWN       | REDUNDANT SAFE       | DETECTION | FIRE LOADING           |              |
| ELEV.      | ROOM     | SYSTEMS PRESENT     | SHUTDOWN SYS.        | INSTALLED | BTU/FT <sup>2</sup> ** |              |
| A.D. 6121  | 12.05    | B T                 | Some Area            | Vac       | 29 200                 |              |
| AD 412     | 293-01   | B-CC & PH Pipipa    | Same Area,           | 168       | 27,200                 |              |
| AD 427 - J | 299-01   | B-RHR Heat Exch     |                      |           |                        |              |
|            |          | A-CC Pipipa         |                      |           |                        |              |
|            |          | B-MO Valve          |                      |           |                        |              |
| AB 412'    | 12-06    | B-RH Pipipo         | Same Area            | Yes       |                        |              |
| AB 426'-6" | 266-01   | A-CND               |                      |           |                        |              |
|            | 200 0 21 | A-CC & RH Piping    |                      |           |                        |              |
|            |          | A-RH Heat Exch.     |                      |           |                        |              |
|            |          | A-MO Valve          |                      |           |                        |              |
| AB 412'    | 12-09    | E-CND               | Same Area            | Yes       |                        | RM 12-11N    |
|            | 12-11    | A-Tray (SP)         |                      |           |                        | Exempt SER 4 |
| н          | 12-11N   | B-SW Piping         |                      |           |                        |              |
|            | 12-18    | B-VU Piping         |                      |           |                        |              |
|            | 12-31    | A&B CC-Piping       |                      |           |                        |              |
|            |          | A-MO Valve-CC       |                      |           |                        |              |
|            |          | B-MO Valve-CC       |                      |           |                        |              |
|            |          | B-Boron Inj. Piping |                      |           |                        |              |
|            |          |                     | in the second second |           |                        |              |
|            | 12-13    | CS-Pump Suction     | 00-01E               | No        | "                      |              |
|            | 12-22    | B-Boron Inj. Line   | 52-02                | No        |                        |              |
|            | 12-23    | B-Boron Inj. Line   | 52-02                | No        |                        |              |
|            | 12-26    | B-Boron Inj. Pipe   | 52-02                | No        |                        |              |
|            |          |                     |                      |           |                        |              |

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| 81.06. 4      |           | SAFE SHUIDDWN         | REDU  | TION OF<br>NDANT SAFE | DETECTION    | AREA OR ZONE  | REMARKS     |
|---------------|-----------|-----------------------|-------|-----------------------|--------------|---------------|-------------|
| ELEV.         | ROOM      | SYSTEMS PRESENT       | SHUTI | DOWN SYS.             | INSTALLED    | BTU/FT2**     |             |
| AB 412'       | 1 2 - 2 7 | A-Tray, E-CND         | Same  | Room                  | Yes          | 29,200        |             |
|               |           | A&C CND               |       |                       |              |               |             |
| 22            | 12-28     | A-VU Piping,          | Same  | Area                  | Yes          | "             |             |
| AB 426'       | 26-01     | A - X A H - 32 - VL , |       |                       |              |               |             |
|               |           | A&B-KH Piping         |       |                       |              |               |             |
|               |           | A-Iray & A <u>CND</u> |       |                       | ¥            | 1.1           |             |
| AB 412'       | 12-30     | B-CC Piping,          | Same  | Koom                  | res          |               |             |
| Sec. Care and |           | A-VU Piping           |       |                       |              |               |             |
| AB 445'       | 45-01     | A - C N D             | Same  | Room                  | Yes          |               |             |
|               |           | D-CND                 |       |                       |              | the second in |             |
| AB 436'       | 36-01     | B Tray,               | Same  | General               | Yes          | 31,500        | No safe     |
|               | 36-03     | A Boric Acid Pump     | Area  |                       | except 36-08 |               | shutdown    |
| 11            | 36-08     | & Pipe,               |       |                       |              |               | equip. is   |
|               | 36-31     | B Boric Acid Pump     |       |                       |              |               | located in  |
|               | 36-33     | & Pipe,               |       |                       |              |               | room 36-08. |
| AB 446'       | 46-01     | CC Piping             |       |                       |              |               |             |
| AB 448'       | 48-01     | MO Valve 9503A-CC,    |       |                       |              |               |             |
| AB 452'       | 52-01     | SW Pipe               |       |                       |              |               |             |
|               | 52-02     |                       |       |                       |              |               |             |
| AB 436'       | 36-10     | A Boric Acid          | Adj.  | Room                  | No           | 31,500        |             |
|               |           | Pump Suction Pipe     |       |                       |              |               |             |
|               | 36-11     | A&B Boric Acid Pump   | Same  | Room                  | No           |               |             |
|               |           | Suction Pipe          |       |                       |              |               |             |
|               | 36-12     | B Boric Acid Pump     | Adi.  | Room                  | No           |               |             |
|               |           | Suction Pipe          |       |                       |              |               |             |
| ×.            | 36-13     | NO Valve              | None  |                       | No           | 31,500        |             |
|               |           | CS Piping             | 1.1   |                       |              |               |             |

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|            |        |  | LOCATION OF    |           | AREA OR ZONE | REMARKS      |
|------------|--------|--|----------------|-----------|--------------|--------------|
| BLDG. &    |        | SAFE SHUTDOWN                          | REDUNDANT SAFE | DETECTION | FIRE LOADING |              |
| ELEV.      | ROOM   | SYSTEMS PRESENT                        | SHUTDOWN SYS.  | INSTALLED | BTU/FT2**    |              |
| AB 436'    | 36-18  | PT-474, 475 & 2000A<br>A-Tray, C-CND   | Same Room      | Yes       | 31,500       | Exempt SER 4 |
|            | 36-30  | A-CC Piping                            | Same Area      | No        |              |              |
| AB 452'-6" | 526-20 | Filter XFL-39CS                        | Adj. Room      | No        |              |              |
|            | 526-21 | A Filter XFL<br>8A-CS,<br>B Filter XFL | Same Room      | No        |              |              |
| AB 463'    | 63-02  | 8 Switchgear<br>& Trays                | 63-16          | Yes       | 40,240       |              |
|            | 63-04  | A Tray                                 | In Same Fire   | Yes       |              |              |
|            | 63-07  | 8 Tray                                 | Ares           | Except    |              |              |
|            | 63 09  | VU Pipe                                |                | RM 63-07  |              |              |
|            | 63-14  | XAH - 33 - VL                          |                |           |              |              |
|            | 63-16  | Vent Unit_                             |                |           |              |              |
|            | 63-19  |  |                |           |              |              |
| AB 474'    | 74-001 |  |                |           |              |              |

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| BLDG. &<br>ELEV. | ROOM                       | SAFE SHUTDOWN<br>Systems present   | LOCATION OF<br>REDUNDANT SAFE<br>SHUTDOWN SYS. | DE TECTION<br>INSTALLED | AREA OR ZONE<br>FIRE LOADING<br>BTU/FT <sup>2</sup> ** | R E M A R K S |
|------------------|----------------------------|--|--|-------------------------|--|---------------|
| AB-463'          | 63-06                      | A, D&E Conduit<br>A&B Boric Acid<br>Tank LT-106, 108,<br>161, 163, 161A, | Same Room                                      | Yes                     | 40,240   |               |
| E P A A - 412'   | 12-02                      | 163A<br>A,B,C, Cable,<br>PI-485, -484,<br>-494, -495, -2010A,<br>-2020A  | Same Room                                      | Yes                     | 5,200  |               |
| EPAA-436'        | 36-02                      | IPV2020<br>B&D Conduit   | Same Room                                      | Yes                     | Negligible   | Exempt SEP 4  |
| WPAA-412'        | 12-01                      | B, E Cable,<br>FCV-122, -8152  | Same Room                                      | Yes                     | 69,200   |               |
| WPAA-436 *       | 36-01                      | A, B Cable<br>IPV-2000   | Same Room                                      | Yes                     | 34,700   |               |
| WPAA-463'        | 63 - 01<br>63 - 0 <u>3</u> | A, B, Cable in<br>Conduit,<br>A, D, Cable in                             | Same Room                                      | Yes                     | 24,400   |               |
| SWPH 425'        | 25-01                      | B Conduit,<br>B SW Pipe  | Room 25-03                                     | No                      | Negligible   |               |
| "                | 25-02                      | C Conduit<br>C SW Pipe   | 25-03 and 01                                   | No                      | Negligible   |               |
|                  | 25-03                      | C Conduit, A CND &<br>Tray, A SW Pipe                                    | Room 25-01                                     | Yes                     | 5,500  |               |
| SWPH 441'        | 41-01A                     | A&B Duct   | In same area<br>41-01A                         | Yes                     | Negligible   |               |

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| BLDG. &<br>ELEV. | R 0 0 M                | SAFE SHUTDOWN<br>SYSTEMS PRESENT  | LOCATION OF<br>REDUNDANT SAFE<br>SHUTDOWN SYS. | DE FECTION<br>INSTALLED | AREA OR ZONE<br>FIRE LOADING<br>BTU/FT <sup>2</sup> ** | REMARKS |
|------------------|------------------------|---|--|-------------------------|--|---------|
| FH 436'          | 36-01W                 | 8 SW Pipe & Boron<br>Injection Piping,<br>A Limit Switch on                     | Same Area                                      | Yes                     | 13,000   |         |
|                  |                        | Valve 8945A & 8942<br>B Limit Switch on<br>Valve 8945B, A<br>Conduit            |  |                         |  |         |
| FH 463'          | 63-01S                 | A Conduit<br>B Conduit<br>B Cable Trav  | Same Area                                      | Yes                     | 11,400   |         |
| CB 482'          | 82-02<br>82-0 <u>3</u> | A Tray & CND<br>A&B Chilled<br>Water Piping                                     | Same Room &<br>82-01/04                        | Yes                     | 35,000   |         |
| IB 412'          | 12-07                  | A fans & Du <u>cts</u><br>A & B Cable in<br>Conduit, Battery<br>Chg. & Transfer | Same Room                                      | Yes                     | 8,600  |         |
|                  | 12-09                  | B Cable in Trav   | 12-02  | Vee                     | 8 600  |         |
|                  | 12-13A                 | B HVAC Equip.<br>Water Chiller<br>Pump, B CND                                   | 12-138, 12-130                                 | Yes                     | 163  |         |
|                  | 12-138                 | C HVAC Equip.<br>Water Chiller<br>Pump, B&C CND                                 | -13A, 12-13C                                   | Yes                     | 163  |         |
|                  | 12-13C                 | A HVAC Equip.<br>Water Chiller<br>Pump, A&C CND                                 | 12-13A, 12-13B                                 | Yes                     | 163  |         |
| IB 423'          | 23-01                  | B Bat. Rm. Supply<br>and Exhaust<br>Plenums, B CND                              | 23-02  | Yes                     | 40,600   |         |

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| BLDG. &<br>ELEV. | ROOM                    | SAFE SHUTDOWN<br>SYSTEMS PRESENT  | LOCATION OF<br>REDUNDANT SAFE<br>SHUTDOWN SYS. | DETECTION<br>INSTALLED | AREA OR ZONE<br>FIRE LOADING<br>BTU/FT <sup>2</sup> ** | REMARKS   |
|------------------|-------------------------|---|--|------------------------|--|---|
| IB 423'          | 23-02                   | A Bat. Rm.<br>Supply & Exhaust  | 23-01 and same<br>room                         | Yes                    | 40,600   | Exempt SER 4  |
| IB 426'          | 26-01                   | B Serv. Water<br>Booster Pump<br>Area Cooling Unit,<br>A, B Solenoids,  | Same Area, also<br>26-02                       | Yes                    | 28,600   | Exempt SER 4  |
| · .              | 26.02                   | Piping, A, B, C Cab   | le<br>Como Anno                                |                        |  |   |
|                  | 26-02                   | A Serv. Water<br>Booster Pump Area<br>Cooling Unit,<br>A, B, Solenoids,<br>Piping, A, B, C<br>Cable   | also 26-01                                     | Yes                    | 5,700  | Exempt SER 4  |
| IB 436'          | 36-02<br>36-0 <u>2E</u> | A, B, C, D Cable in<br>Conduit, A Cable<br>in tray,<br>B IPV-2010, A, B, C<br>MS safety valves,<br>solenoids & piping,<br>A&B VU&CC valves<br>& piping, PT-484,<br>485, 2010A<br>PT-494, 495, 20 <u>20A</u> | Same Room                                      | Yes                    | 20,600   | Automatic<br>sprinklers<br>are provided<br>in the SW<br>corner of<br>room 36-02<br>as shown<br>on the Fire<br>Protection<br>Evaluation<br>Report Dwg. |
|                  | 36-03B                  | Reactor Protection<br>Under Freq. & Vol.<br>Relay & Trans.<br>Panel.  | None   | Yes                    | 35,700   | Exempt SER 4  |
|                  | 36-04                   | A, B, VU Piping, A<br>Cable in tray, A<br>Comp. Cool. Speed<br>Switch   | 36-05 & 06 &<br>Same Room                      | Yes                    | 10,500   |   |
| •                | 36-06                   | C Cable in Conduit,<br>B Comp. Cool. Speed<br>Switch  | 36-04 & 06                                     | No                     | 10,000   |   |

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| BLDG. &<br>ELEV. | ROOM  | SAFE SHUTDOWN<br>SYSTEMS PRESENT   | LOCATION OF<br>REDUNDANT SAFE<br>SHUTDOWN SYS. | DE TECTION<br>INSTALLED | AREA OR ZONE<br>FIRE LOADING<br>BTU/FT <sup>2</sup> ** | REMARKS      |
|------------------|-------|--|--|-------------------------|--|--------------|
| IB 451'          | 51-01 | A,B Cable in<br>conduit, A VU<br>Piping, XAH6-VL,<br>ESF SWG Rm. Cool                              | 51-02 & Same Rm                                | Yes                     | 14,000   | Exempt SER 4 |
|                  | 51-02 | J,K,L,M, C Cable<br>in conduit, B VU<br>Piping, XAH-8-VL,<br>ESF SWG Rm. Cool.<br>Upit B           | 51-01 & Same Rm                                | Yes                     | 14,000   | Exempt SER 4 |
|                  | 51-03 | A,B,J,K,L,M Cable<br>in CND, B VU Piping<br>XAH-198-VL,<br>B Cooling Unit for<br>Speed Switch Room | 51-04 & Same Rm                                | Yes                     | 3,700  | Exempt SER 4 |
|                  | 51-04 | A Cable in conduit,<br>A, B, VU Piping,<br>A XAH-9A-VL, A<br>Cooling Unit for<br>Speed Switch Room | 51-03 & Same Rm                                | Yes                     | 3,700  |              |
| DG 400'          | 00-01 | A tray<br>A-SW piping<br>A&B piping from<br>Condensate Tank  | 00-02 & Same Rm                                | Yes                     | 5,200  |              |

\* [] Indicates corridors and/or rooms with open passages into corridors and groups of equipment located in these spaces.

\*\* Fire loading is for entire fire area or fire zone.

#### SOUTH CAROLINA ELECTRIC & GAS COMPANY POST OFFICE BOX 764 COLUMBIA, SOUTH CAROLINA 29218

T. C. NICHOLS, JR. VICE PRESIDENT AND GROUP EXECUTIVE NUCLEAP OPERATIONS

April 20, 1981

Mr. Harold R. Denton, Director Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Washington, D. C. 20555

> Subject: Virgil C. Summer Nuclear Station Docket No. 50/395 Fire Protection, Appendix R

Dear Mr. Denton:

South Carolina Electric & Gas Company acting for itself and as agent for the South Carolina Public Service Authority hereby commits to compliance with 10 CFR Part 50 Appendix R, parts G, J and O. Any deviations therefrom will be resolved in a manner acceptable to the NRC staff.

If you have any questions, please let us know.

Very truly yours, 9. l. Michol, h

T. C. Nichols, Jr.

NEC:TCN:rh

cc:

| ν.  | С. | Summer        |
|-----|----|---------------|
| G.  | Н. | Fischer       |
| т.  | с. | Nichols, Jr.  |
| С.  | Α. | Price .       |
| D.  | Α. | Nauman        |
| W.  | Α. | Williams, Jr. |
| R.  | Β. | Clary         |
| Α.  | R. | Koon          |
| Α.  | Α. | Smith         |
| н.  | Ν. | Cyrus         |
| J.  | В. | Knotts, Jr.   |
| J.  | L. | Skolds        |
| Β.  | Α. | Bursey        |
| 0.  | S. | Bradham       |
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## SOUTH CAROLINA ELECTRIC & GAS COMPANY POST OFFICE BOX 764 COLUMBIA, SOUTH CAROLINA 29218

June 1, 1981

T. C. NICHOLS, JR. VICE PRESIDENT AND GROUP EXECUTIVE NUCLEAR OPERATIONS

Mr. Harold R. Denton, Director Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Washington, D. C. 20555

> Subject: V. C. Summer Nuclear Station Docket No. 50/395 Fire Protection Review SER Open Item 1.6.10

Dear Mr. Denton:

The fire hazard evaluation for Virgil C. Summer Nuclear Station was completed in accordance with Appendix A to Branch Technical Position APCSB 9.5-1 to provide a fire safe plant. In a meeting with the NRC Staff in November, 1979, SCE&G agreed to provide all the requirements that were requested at that time by the Staff. The NRC Staff indicated that if this were done, the fire system would be acceptable. Measures to meet these requirements have been, cr are being, implemented.

Subsequent to the events outlined above, Appendix R to 10 CFR Part 50 was issued. In our letter to Mr. Denton on January 30, 1981 we reported that an initial review indicated general compliance with minor exceptions which were listed. In our letter to Mr. Denton dated April 20, 1981, commitment was made to comply with Parts G, J and O of Appendix R, with deviations therefrom to be resolved in a manner acceptable to the NRC Staff. The requirements of Appendix R, Section G.2, are discussed below in relation to fire protection provided for the V. C. Summer Nuclear Station and Application for Exemption is made for differences identified.

Requirements:

- "2. Except as provided for paragraph G.3 of this section, where cables or equipment, including associated nonsafety circuits that could prevent operation or cause maloperation due to hot shorts, open circuits, or shorts to ground, or redundant trains of systems necessary to achieve and maintain hot shutdown conditions are located within the same fire area outside of primary containment, one of the following means of ensuring that one of the redundant trains is free of fire damage shall be provided:
  - a. Separation of cables and equipment and associated non-safety circuits of redundant trains by a fire barrier having a 3-hour rating. Structural steel forming a part of or supporting such fire barriers shall be protected to provide fire resistance equivalent

Mr. Harold R. Denton June 1, 1981 Page Two

to that required of the barrier;

- Separation of cables and equipment and associated non-safety circuits of redundant trains by a horizontal distance of more than 20 feet with no intervening combustible or fire hazards. In addition, fire detectors and an automatic fire suppression system shall be installed in the fire area; or
- c. Enclosure of cable and equipment and associated non-safety circuits of one redundant train in a fire barrier having a 1-hour rating. In addition, fire detectors and an automatic fire suppression system shall be installed in the fire area;"

### Exemption Requested:

Application is made for exemption to the above requirements in the specific cases and to the extent described below:

- Component cooling water pumps B & C do not meet the above separation requirements.
- HVAC equipment water chiller pumps do not meet the above separation requirements.
- Automatic fire suppression systems are provided for the Auxiliary Building and the Intermediate Building only in those areas identified in item 1 below.
- Fire detection systems are provided for the Auxiliary Building and the Intermediate Building only in those areas identified in item 4 below.

Fire zones and fire areas within the Intermediate and Auxiliary Buildings are identified in a list included as Attachment I to this letter. Also listed are the safe shutdown equipment and/or cable and the fire loading within each zone or area.

### Rational For The Exemption Request:

The following fire protection is provided in the Auxiliary Building and in the Intermediate Building:

- 1. Automatic Fire Suppression and Detection Systems are provided in:
  - a. Zone 9, hallway, south end of the Auxiliary Building.
  - b. Fire Area IB-9, chilled water pump room in the Intermediate Building.

Mr. Harold R. Denton June 1, 1981 Page Three

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- c. Zone 5, general floor area in the Intermediate Building, including area in which are located component coooling water pumps B & C.
- 2. Manual Sprinkler Systems are provided for the following:
  - Zone 6, truck bay, and drumming station/compactor area in the Auxiliary Building.
  - b. Charcoal filter plena in the Auxiliary Building for the following HVAC Systems:
    - Reactor Building purge exhaust
    - Reactor Building charcoal clean-up
    - Auxiliary Building charcoal exhaust
    - 4. Fuel Handling Building charcoal exhaust
- 3. The light hour fire rated barriers were provided for one division where redundant safe shutdown circuits or equipment are separated by less than 20 feet and no 3-hour barrier, with very low fire loading or without intervening combustibles, except in the cases noted in items 5 and 6 below.
- 4. Ionization detectors were added for equipment areas where redundant, safe shutdown equipment was not separated by 3-hour fire rated barriers.

Ionization detectors are provided in the following areas of the Auxiliary Building:

- a. RHR pump area elevation 374'.
- b. Charging/safety injection pump area elevation 388'.
- c. Cooling units area for charging pump rooms elevation 400'.
- d. Corridor Area and Switchgear room elevation 463'.

Ionization detectors are provided in the following areas of the Intermediate Building:

- a. Elevation 412'.
  - 1. Room 12-02, General Floor Area
  - Room 12-10, Turbine Driven Emergency Feedwater Pump Room.
  - Room 12-12, Chiller A Room.

Mr. Harold R. Denton June 1, 1981 Page Four

- 4. Room 12-13, Chiller Pump Room
- 5. Room 12-14, Chiller C Room
- 6. Room 12-15, Chiller B Room
- b. Elevation 423'6", Room 236-01 Emergency Feedwater Pump Cooling Units.
- c. Elevation 436'
  - 1. Room 36-01, Switchgear Room
  - Room 36-03 and Room 36-03A Control Room Evacuation Panel Area.
- d. Elevation 463' Switchgear Foom.
- Radiant shield walls of one-hour construction were provided between component coooling water pumps B & C and HVAC equipment water chiller pumps.
- 6. A horizonta' "M" board fire barrier was provided over service water booster pump "A" in addition to automatic sprinklers and ionization detectors to separate redundant "B" circuits.

In consideration of the separation and protection provided as described above, and the low fire loading in the affected areas, we have concluded that the plant is presently very well protected from a fire protection standpoint, and could be safely shut down with an <u>in situ</u> or exposure fire in any area of the plant. Additionally, the protection provided is in accordance with measures stated to be acceptable by the NRC Staff in the meeting between SCE&G and the Staff in November, 1979.

We request the Staff review the above exemption requests and let us know your conclusion as soon as possible. If you have any questions, please let us know.

Very truly yours,

T. C. Nichols, Jr.

GW:TCN:pj Attachment cc: V. C. Summer C. H. Fischer H. N. Cyrus T. C. Nichols, Jr. D. A. Nauman W. A. Williams, Jr. R. B. Clary O. S. Bradham

A. R. Koon M. N. Browne B. A. Bursey Dr. J. Ruoff J. L. Skolds J. B. Knotts, Jr. NPCF File

# ATTACHMENT I

| AUXILIARY BUILDING                                  | Cofe Chubdre  | Cofe Church |                            |
|---|---|-------------|----------------------------|
| Fire Zone/Area                                      | Equipment   | Cable       | Fire Load                  |
| Zone 1-Sub-Basement<br>374'-0"                      | RHR Pumps A & B<br>RHR Cooling Units A & B  | Yes         | 7,200 BTU/ft <sup>2</sup>  |
| Zone 2-Sub-Basement<br>388'0"                       | Charging Pumps A, B & C   | Yes         | 11,900 BTU/ft <sup>2</sup> |
| Zone 3-Recirculation<br>Valve Room 397'-0"          | -   | Yes         | 12,700 BTU/ft <sup>2</sup> |
| Zone 4-Charging<br>Pump Room Cooling<br>Units       | Cooling Units A, B & C,<br>Instrumentation  | Yes         | 2,100 BTU/ft <sup>2</sup>  |
| Zone 5-Basement<br>412'-0"                          | RHR Heat Exchanger A & B<br>MCC, Instrumentation  | Yes         | 29,200 BTU/ft <sup>2</sup> |
| Zone 6-Mezzanine<br>436'-0"                         | Boric Acid Pumps A & B<br>Instrumentation   | Yes         | 21,500 BTU/ft <sup>2</sup> |
| Zone 7-Drumming<br>Station<br>436'-0"               | None  | None        | 15,000 BTU/ft <sup>2</sup> |
| Zone 8-Hot Machine                                  | None  | None        | -                          |
| Shop 436'-0"<br>Zone 9-Operating<br>Floor<br>#63'0' | Instrumentation<br>Boric Acid Tanks A & B<br>480 V. Switchgear, Motor Control<br>Center | Yes         | 40,240 BTU/ft <sup>2</sup> |
| Zone 10-Ventillation                                | None  | None        | 24,400 BTU/ft              |

Equipment Level 485'-0"

# ATTACHMENT I

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| INTERMEDIATE BUILDING  |   |                        |   |
|--|---|------------------------|---|
| Fire zone/Area   | Safe Shutdown<br>Equipment  | Safe Shutdown<br>Cable | Fire Load   |
| IB-1 through IB-6  | Redundant Safe Shutdown Equipment i<br>fire barriers.   | s separated by         | 3-hour  |
| Zone ]<br>I3-7 through IP-9<br>Elev. 412'0"  | HVAC Water Chillers A, B, & C and<br>HVAC Water Chiller Pumps   | Yes                    | 6,600 BTU/ft <sup>2</sup><br>in each Chiller<br>Room and<br>163 BTU/ft <sup>2</sup><br>in Chiller Pump<br>Rooms (4.2 gallons<br>of oil in each<br>pump_motor) |
| Zoie 2<br>Turbine Driven<br>Emergency Feed-<br>water Pump Room   | Turbine Driven Emergency Feedwater<br>Pump and Turbine  | Yes                    | 13,100 BTU/ft <sup>2</sup>  |
| Zone 3<br>East Penetration<br>Access Area  | None  | Yes                    | 5,200 BTU/ft <sup>2</sup>   |
| None 4<br>West renetration<br>Access Area  | None  | Yes                    | 69,200 BTU/ft <sup>2</sup>  |
| Zone 5<br>General Floor<br>Nrea 412'0"   | Component Cooling Water Heat<br>Exchangers A & B<br>Component Cooling Water Pumps<br>A, B & C<br>Service Water Booster Pumps A & B<br>Motor Driven Emergency Feedwater<br>Pumps A & B | Yes                    | 43,000 BTU/ft <sup>2</sup>  |
| Zone 6<br>Battery Room<br>Ventillation<br>Equipment<br>Fire Area IB-10<br>Room A & B<br>Elevation 423'0" | Air Handling Unit A in Room A<br>Unit B in Room B   | Yes                    | 40,600 BTU/ft <sup>2</sup>  |
| Zone 7<br>Service Water<br>Booster Pump<br>Cooling Equip.<br>Room A & B<br>Elev. 426'0"                  | Cooling Unit A<br>Cooling Unit B  | Yes                    | 5,700 BTU/ft <sup>2</sup> -Rm.A<br>28,600 BTU/ft <sup>2</sup> -Rm.B   |
| Zone 8<br>Switchgear<br>Room B Elev. 436'0"  | 7200V ESF Switchgear B<br>480V ESF Switchgear B<br>ESF MCC - B  | Yes                    | 15,300 BTU/ft <sup>2</sup>  |

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# ATTACHMENT I

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| Fire Zone/Area   | Safe Shutdown<br>Equipment  | Safe Shutdown<br>Cable | Fire Load   |  |
|--|---|------------------------|---|--|
| Zone 9<br>Speed Switch Rooms<br>A, B. C. Elevation<br>436'0"                   | Component Cooling Water Pump Yes<br>Speed Switches A, B and C<br>C.C. Water Pump C<br>Transfer Switch in Room C |                        | Room A<br>10,500 BTU/ft <sup>2</sup><br>Room B<br>10,000 BTU/ft <sup>2</sup><br>Room C<br>15,600 BTU/ft <sup>2</sup>                        |  |
| IB-14, IB-15 and<br>IB-15A CREP and<br>Switchgear Rooms,<br>Elevation 436'0"   | CREP-A, Reactor Protection Under-<br>frequency and Under Voltage Relay<br>and Transformer Panels, CREP-B        | Yes                    | 50,800 BTU/ft <sup>2</sup> in<br>Room 36-03A<br>35,700 BTU/ft <sup>2</sup> in<br>Room 36-03B<br>52,400 BTU/ft <sup>2</sup> in<br>Room 36-03 |  |
| Zone 10<br>East Penetration<br>Access Area<br>Elevation 436'0"                 | Main Steam Power Relief Valve and<br>Instrumentation  | Yes                    | Very Low - Cable<br>Insulated in<br>Conduit Not<br>Quantified   |  |
| Zone 11<br>West Penetration<br>Access Area<br>Elevation 436'0"                 | Main Steam Power Relief Valve and<br>Instrumentation  | Yes                    | 34,700 BTU/ft <sup>2</sup>  |  |
| Zone 12<br>General Floor<br>Area 436'-0"                                       | Main Steam Power Relief Valve   | Yes                    | 20,600 BTU/ft <sup>2</sup>  |  |
| IB 16 & IB 17<br>Switchgear Cooling<br>Units Rooms A & B<br>Elevation 451'0"   | ESF Switchgear<br>Cooling Units   | Yes                    | Room A<br>14,000 BTU/ft <sup>2</sup><br>Room B<br>14,000 BTU/ft <sup>2</sup>  |  |
| IB-18 and IB-19<br>Speed Switchroom<br>Cooling Units<br>Rooms A & B<br>451'-0" | Speed Switchroom Cooling Units  | Yes                    | Room A 0<br>Room B<br>3,700 BTU/ft <sup>2</sup>   |  |
| IB-20 Switchgear<br>Room A<br>Elev. 463'0"                                     | 7200V ESF Switchgear A<br>480V ESF Switchgear A<br>480V MCC - A   | Yes                    | 95,000 BTU/ft <sup>2</sup>  |  |
| IB-21<br>CRDM Switchgear<br>Room Elev. 463'0"                                  | Reactor Trip Switchgear   | Yes                    | 58,100 BTU/ft <sup>2</sup>  |  |
| Zone 13  | None  | Yes                    | 24,000 BTU/ft <sup>2</sup>  |  |
| Access Area<br>463'0"  | TAON INC.   |                        |   |  |

See Virgil C. Summer Nuclear Station Fire Protection Evaluation for further details regarding these fire zones and fire areas.

SOUTH CAROLINA ELECTRIC & GAS COMPANY POST OFFICE BOX 764 COLUMBIA, SOUTH CAROLINA 29218

T. C. NICHOLS, JR. VICE PRESIDENT AND GROUP EXECUTIVE NUCLEAR OPERATIONS

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July 16, 1981

Mr. Harold R. Denton, Director Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Washington, D. C. 20555

> Subject: Virgil C. Summer Nuclear Station Docket No. 50/395 Fire Protection Review SER Open Item 1.6.10

Dear Mr. Denton:

A meeting was held on July 7, 1981, between South Carolina Electric and Gas Company and members of the NRC staff concerning fire protection for the Virgil C. Summer Nuclear Station. Topics discussed at that meeting are addressed in this letter. The following corresponds to the nine notes relative to SER Section 9.5.1 discussed in the meeting.

1. As requested, isolation valves will be added on laterals for two fire hydrants, XFX-IN-FS and XFX-IM-FS. Other hydrants are sufficiently isolated from interior fire suppression systems by sectionally aligning valves that hydrant maintenance will not impair interior fire protection systems.

2. Water suppression systems are provided in the 463 foot elevation of the Control Building only in the cable chase areas (not in the technical support area, control room, or support areas.) The main floor area is provided with fire detection equipment, hose stations and portable extinguishers as described in the Fire Protection Evaluation. Water suppression systems are not provided in the relay or computer rooms, which are protected by an automatic CO<sub>2</sub> system.

3. Information supplemental to our letter to you dated June 1, 1981, in regard to fire protection, is included as Attachment I to this letter. This information pertains to areas in which the fire protection provided differs from and is an alternative to the protection described in 10CFR50 Appendix R, Section III.G.2. Essentially, these Mr. H. R. Denton July 16, 1981 Page 2

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areas contain (a) a 1½ hour fire barrier on one train of redundant cable or equipment, or 20 foot separation between redundant trains, and (b) a low fire loading. The fire barrier ratings required by the National Fire Protection Association to protect against various fire loadings are shown in Attachment II. The drawings referenced in Attachment I can be found in the Virgil C. Summer Nuclear Station Fire Protection Evaluation. The fire loadings shown in Attachment I were, for the most part, taken from the Fire Protection Evaluation; these fire loadings are best estimates based on information available.

4. Hose stretch tests were performed for the Control Building and Penetration Access Areas. As a result of these tests, one 75 foot hose in the Control Building was replaced by a 100 foot hose. Other hoses were found to be acceptable without extending the length.

5. The Service Water Pump House is provided with a preaction sprinkler system in the main pump room and in the HVAC fan room. The building is also served by a fire hydrant located nearby, as shown in drawing E-023-001 in the Fire Protection Evaluation. Therefore, a standpipe hose station is not required at the Service Water Pump House.

6. Those fire detection systems which are used to actuate water suppression systems will be upgraded to a Class A system as defined in NFPA Standard 72D.

7. Structural steel framing in zone 3 of the Intermediate Buiding will be provided with a fire barrier rated at one hour or the zone will be provided with a sprinkler system. Fire protection commitments for zone 5 of the Intermediate Building remain as is. The ladder opening between the A train switchgear cooling unit room and the B train switchgear room in the Intermediate Building will be filled-in with grout and an opening will be provided between the A train cooling unit and the A train switchgear room for emergency exit. Floor and ceiling openings in the service water booster pump area cooling equipment room A will remain as is.

8. South Carolina Electric and Gas will submit to the NRC verification from the manufacturer of the three-hour rating of gypsum board construction used at the Virgil C. Summer Nuclear Station.

Mr. H. R. Denton July 16, 1981 Page 3

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9. The control room support areas will be separated from the control room by a one-hour fire rated wall which will extend from the floor slab to the ceiling slab, above the suspended ceiling, or an automatic sprinkler system will be provided in the support areas. The technical support area will be separated from the control room by a 2 hour fire rated wall with 1½ hour rated fire dampers or shutters where required and 1½ hour rated class B doors.

It is our understanding that the above statements represent mutual agreements reached in the July 7 meeting between representatives of South Carolina Electric and Gas and NRC. It was also agreed that reference to HVAC smoke detectors, heat detectors and temperature monitors be deleted from the Fire Protection Evaluation report since area fire detection systems have been provided where required.

Discussion in the meeting of July 7 failed to include the fact that, contrary to a statement on page 9-21 of the SER, curbs are not provided between the chilled water pumps. Fire protection for this area includes:

a. An automatic sprinkler system,

b. Radiant shield walls of one-hour construction between pumps to divide the room into three areas.

c. A fire detection system.

d. A  $1\frac{1}{2}$  hour fire rated barrier for cable from one division which passes through the pump area for another division.

Note: Oil in each pump cubicle amounts to only 4.2 gallons. Placement of curbs between pumps would block drainage from the A and B pump areas

We consider that, excluding item 3 above, the areas of difference regarding SER section 9.5.1 discussed in the meeting of July 7 have been resolved as recorded in this letter and we request that the SER be promptly amended accordingly. Sufficient information has been provided for Mr. H. R. Denton July 16, 1981 Page 4

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the resolution of item 3 and the SER amendment should also incorporate appropriate changes with respect to that item.

If you have any questions, please let us know.

Very truly yours, T. C. Nichols, Jr.

GW:TCN:1kb

Attachments (2)

| cc: | ۷.  | С. | Summer        |
|-----|-----|----|---------------|
|     | G.  | Н. | Fischer       |
|     | н.  | Ν. | Cyrus         |
|     | Τ.  | С. | Nichols, Jr.  |
|     | Dr. | J. | Ruoff         |
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|     | W . | Α. | Williams, Jr. |
|     | R.  | Β. | Clary         |
|     | 0.  | s. | Bradham       |
|     | Α.  | R. | Koon          |
|     | Μ.  | Ν. | Browne        |
|     | Β.  | Α. | Bursey        |
|     | J.  | L. | Skolds        |
|     | J.  | Β. | Knotts, Jr.   |
|     | NPC | F  | a na mga na s |
|     | Fil | e  |               |

V. C. Summer Nuclear Station Supplemental Information to SCE&G Request for Relief Pertaining to 10CFR50 Appendix R, Section III.G.2. (See note 3 concerning SER Section 9.5.1)

> Attachment 1 July 16, 1981

 Auxiliary Building, zone 1, area near residual heat removal system/spray pump room cooling unit A, elevation 385'. See drawing E-023-002, room number 85-01.

Zone 1 Fire Loading is 7,200 BTU/ft.<sup>2</sup>.

Total Combustibles in Zone 1 are:

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(a) Lubricating oil, 608,000 BTU and(b) Cable insulation, 90,000,000 BTU.

<u>Comments</u>: Fire loading is extremely low in the immediate vicinity of cooling unit A. This loading consists of cable insulation found in three cable trays each approximately three inches wide, and several small lighting cable conduits, all of which are routed above the unit near the ceiling. Several other small cable trays are 10 or 15 feet away and at a higher elevation than the cooling unit. The cooling unit is located on a slab at elevation 385', which is eleven feet above the main floor at elevation 374'.

<u>Conclusion</u>: Based on the low fire loading and the fact that combustibles are not concentrated in this area, it is concluded that the fire protection provided for this area, as described in the Fire Protection Evaluation, is adequate and no additional fire protection is required.

 Auxiliary Building, zone 2, charging pump room A, elevation 388'. See drawing E-023-003, room number 88-25.

Fire Loading of Charging Pump Room A is 12,400 BTU/ft.<sup>2</sup>.

Total Combustibles in Charging Pump Room A are:

(a) Lubricating oil, 6,840,000 BTU, and (b) Cable insulation, 441,000 BTU.

<u>Comments</u>: All cable in this room is contained in conduit which is dispersed throughout the room. There is some B train cable mounted on the north wall, which is about five feet from the north side of the pump.

<u>Conclusion</u>: Based on the low fire loading and the fact that combustibles are not concentrated in this area, it is concluded that the fire protection provided for this area, as described in the Fire Protection Evaluation, is adequate and no additional fire protection is required. Attachment I Page 2 July 16, 1981

 Auxiliary Building, zone 3, recirculation valve room, elevation 397'. See drawing E-023-003, room number 97-02.

Fire Loading of Zone 3 is 12,700 BTU/ft.<sup>2</sup>

Total Combustibles in Zone 3 is: cable insulation 90,000,000 BTU.

<u>Comments</u>: This large room contains mostly piping and valves. About 90% of the cable loading in this area occurs in cable trays in the portion of the room located west of column line 8.8. The remainder of cable is dispersed throughout the area east of column line 8.8, but the majority of this is in conduit.

<u>Conclusion</u>: Based on the low fire loading and the fact that combustibles are not concentrated in the portion of this area containing safe shutdown cable, it is concluded that the fire protection provided for this area, as described in the Fire Protection Evaluation, is adequate and no additional fire protection is required.

 Auxiliary Building, zone 4, charging pump room cooling units room, elevation 400'. See drawing E-023-004, room number 00-02.

Zone 4 Fire Loading is 2,100 BTU/ft.<sup>2</sup>

Total Combustibles in Zone 4 are: cable insulation 4,000,000 BTU.

<u>Comments</u>: About half of the cable in this area is contained in conduit dispersed throughout the room. A cable tray, approximately one foot wide and wrapped in kaowool, runs across the room from east to west below the ceiling, as shown in the referenced drawing. Since the small quantity of cable in this area is either contained in conduit or is wrapped in kaowool, there is practically nothing in this area which could burn.

<u>Conclusion</u>: Based on the low fire loading and the fact that combustibles are not concentrated in this area, it is concluded that the fire protection provided for this area, as described in the Fire Protection Evaluation, is adequate and no additional fire protection is required. Attachment i Page 3 July 16, 1981

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 Auxiliary Building, zone 5, northeast general floor area near open ceiling hatch, elevation 412'. See drawing E-023-005, room number 12-11N.

Fire Loading in Zone 5 is 29,200 BTU/ft<sup>2</sup>.

Combustibles in Zone 5 consist of: cable insulation, 470,000,000 BTU.

<u>Comments</u>: Fire loading in this corner of zone 5 is low. Two lightly loaded 3 foot wide, ceiling mounted cable trays run north to south on the west side of the equipment hatch. Two small ceiling mounted trays run diagonally on the southeast side of the hatch. About 12 conduits run up and along the wall on the west side of the hatch and enter the area above the 426'6" slab. Several more conduits run up and along the wall on the east side of the hatch.

<u>Conclusion</u>: Based on the low fire loading and the fact that combustibles are not concentrated in this area, it is concluded that the fire protection provided for this area, as described in the Fire Protection Evaluation, is adequate and no additional fire protection is required.

 Auxiliary Building, zone 6, backup heater transformer area; hallway south end, elevation 436'. See drawing E-023-008, room number 36-18.

Zone 6 Fire Loading is 31,500 BTU/ft.2

Total Combustibles in Zone 6 consist of:

(a) Lubricating oil, 637,500 BTU, and (b) Cable insulation 440,000,000 BTU

<u>Comments</u>: Cable is routed in trays and conduit located below the ceiling. This hall is an area of relatively heavy cable loading. The backup heater transformers are not identified as safe shutdown equipment in the Fire Protection Evaluation.

Conclusion: Based on the fact that redundant trains of safe shutdown equipment or cable are not located in this area, it is concluded that no additional fire protection is required. Attachment I Page 4 July 16, 1981

 Intermediate Building, fire areas IB-10, battery room ventilation equipment room, elevation 423'. See drawing E-023-007, room number 23-02, Auxiliary Plan A.

Fire Loading in Rcom 23-02 is 40,600 BTU/ft.<sup>2</sup>.

Total Combustibles in Room 23-02 consist of: cable insulation, 30,000,000 BTU.

<u>Comments</u>: Fire loading consists of cable in tray and some conduit, fairly well dispersed throughout the area. One tray approximately 12 inches wide runs vertically; the remainder of cable runs are essentially horizontal.

<u>Conclusion</u>: Based on the low fire loading and the fact that combustibles are not concentrated in this area, it is concluded that the fire protection provided for this area, as described in the Fire Protection Evaluation, is adequate and no additional fire protection is required.

 Intermediate Building, zone 7 and fire area IB-11, service water booster pumps area cooling equipment rooms A and B, elevation 426'. See drawing E-023-007, room numbers 26-01 and 26-02. Auxiliary Plan D.

Fire Loadings are:

(a) Room A (26-02) 5,700 BTU/ft.  $^2$  and (b) Room B (26-01) 28,600 BTU/ft.  $^2$ .

Total Combustibles consist of:

(a) Room A, cable insulation, 4,000,000 BTU.(b) Room B, cable insulation, 20,000,000 BTU.

<u>Comments</u>: In both rooms, cable is essentailly evenly distributed throughout the room, mostly in horizontal runs. About half of the cable is in conduit and half in tray.

<u>Conclusion</u>: Based on the low fire loading and the fact that combustibles are not concentrated in this area, it is concluded that the fire protection provided for this area, as described in the Fire Protection Evaluation, is adequated and no additional fire protection is required. Attachment I Page 5 July 16, 1981

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 Intermediate Building, fire area IB-15A, Reactor Protection Underfrequency and Undervoltage Relay and Transformer Panel, elevation 436'. See drawing E-023-010, room number 36-03B.

Fire Loading in fire area IB-15A is 35,700 BTU/ft<sup>2</sup>.

Total Combustibles consist of: cable insultaion 11,000,000 BTU.

<u>Comments</u>: About 70% of the cable in this room consists of A train cable routed vertically on the east wall approximately 8'6" from the east side of the equipment panels. The remainder of cable is in conduit, most of which is located above the panels, including one small B train conduit.

<u>Conclusion</u>: Based on the low fire loading and the fact that combustibles are not concentrated in this area, it is concluded that the fire protection provided for this area, as described in the Fire Protection Evaluation, is adequate and no additional fire protection is required.

 Intermediate Building, zone 10, east penetration access area, elevation 436'. See drawing E-023-010, room number PA 36-02.

<u>Comments</u>: Fire loading and combustibles in this area are so low that they were not quantified in the Fire Hazards Analysis. The area contains piping. There are a few widely dispersed cables in conduit attached to the ceiling. The fire loading in this area is essentially zero.

<u>Conclusion</u>: Based on the low fire loading and the fact that combustibles are not concentrated in this area, it is concluded that the fire protection provided for this area, as described in the Fire Protection Evaluation, is adequate and no additional fire protection is required. Attachment I Page 6 July 16, 1981

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 Intermediate Building, zone 12, general floor area, areas near redundant cable interaction, elevation 436'. See drawing E-023-010, room number I3 36-02.

Fire Loading is 20,600 BTU/ft. 2.

Total Combustibles consist of: cable insulation, 220,000,000 BTU.

<u>Comments</u>: Cable is concentrated in the area immediately to the east and north of the switchgear room in the vicinity of and to the west of column line 7.5. A preaction sprinkler system is provided in the area approximately between column lines 6.8 and 8.3. The area to the east of column line 6.8 has an extremely low fire loading; one cable tray runs east to west from one end of this area to the other as shown in the referenced drawing and a few widely dispersed conduits are to be found.

Conclusion: Based on the fact that a sprinkler system is provided in the portion of this area in which the cable loading is concentrated, it is concluded that no additional fire protection is required.

12. Intermediate Building, fire areas IB-16 and IB-17, switchgear cooling unit rooms, elevation 451'. See drawing E-023-010, room numbers 51-01 and 51-02, Auxiliary Plan A.

Fire Loadings are:

(a) room A (51-01) 14,000 BTU/ft.<sup>2</sup>, and (b) room B (51-02) 14,000 BTU/ft.<sup>2</sup>.

Total Combustibles consist of:

(a) room A, cable insulation, 10,000,000 BTU, and(b) room B, cable insulation, 10,000,000 BTU.

Comments: (a) Room A: Fire loading is very light. One lightly loaded cable tray runs north to south against east wall. Another short, lightly loaded tray is located in the northeast corner. The remainder of the cable is in dispersed conduit mounted below the ceiling. There are no vertical trays in this area. (b) Room B: Fire loading is very light. Roughly half of the cable is in conduit and half in trays. There are two vertical sections of cable tray on opposite sides of the room, each containing six cables of about 2 inch diameter. Cable is not concentrated in any part of the room. Attachment I Page 7 July 16, 1981

2 1

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<u>Conclusion</u>: Based on the low fire loading and the fact that combustibles are not concentrated in this area, it is concluded that the fire protection provided for this area, as described in the Fire Protection Evaluation, is adequate and no additional fire protection is required.

 Intermediate Building, fire area IB-19, speed switch room cooling unit room B, elevation 451'. See drawing E-023-010, room 51-03, Auxiliary Plan B.

Fire Loading is 3,700 BTU/ft.<sup>2</sup>.

Total Combustibles consist of: cable insulation, 800,000 BTU.

<u>Comments</u>: One cable tray, approximately two feet wide, runs form the south wall to the center of the room at which point the cables penetrate the ceiling. All other cable is in conduit dispersed throughout the room. An A train conduit, wrapped in kaowool, runs about two feet to the east and two feet above the cable tray. Other A train conduit in the room is also wrapped in kaowool.

Conclusion: Based on the low fire loading and the fact that combustibles are not concentrated in this area, it is concluded that the fire protection provided for this area, as described in the Fire Protection Evaluation, is adequate and no further measures are required.

### Attachment II July 16, 1981

REQUIRED BARRIER RATINGS FOR FIRE LOADINGS (1)

Fire Loading BTU/ft. 40,000 80,000 120,000 160,000 200,000 240,000

Required Barrier Rating

30 minutes 1 hour 1½ hours 2 hours 2½ hours 3 hours

## NOTES:

1 1

- From <u>National Fire Protection Association Handbook</u>, 14th Edition, page 6-81.
- (2) "Combustible" is used to refer to any material or structure that can burn (National Fire Protection Association Handbook, 14th Edition, page A-39).

SOUTH CAROLINA ELECTRIC & GAS COMPANY POST OFFICE BOX 764 COLUMBIA, SOUTH CAROLINA 29218 August 21, 1981

T. C. NICHOLS, JR. VICE PRESIDENT AND GROUP EXECUTIVE NUCLEAR OPERATIONS

Mr. Harold R. Denton Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Washington, D.C. 20555

> Subject: Virgil C. Summer Nuclear Station Docket No. 50/395 Fire Protection SER Open Item 1.6.10

> > 810825055

Dear Mr. Denton:

On July 7, 1981, a meeting was held between South Carolina Electric and Gas Company (SCE&G) and members of the NRC staff to discuss nine (9) items from the Virgil C. Summer Nuclear Station Safety Evaluation Report, Section 9.5.1 relative to the topic of fire protection. Pursuant to that meeting a letter, dated July 16, 1981, was sent providing responses to the items discussed. Subsequently, SCE&G now supplies additional information to fulfill and clarify commitments.

At the request of the NRC staff, SCE&G committed (see item 3 of the above referenced letter) to provide verification from the manufacturer of the three-hour rating of gypsum board construction used at the Virgil C. Summer Nuclear Station. Attached is a letter from U. S. Gypsum supplying the required verification. Additional design information pertaining to the gypsum assembly is contained in section 2.2.3 of the Fire Protection Evaluation.

In reference to item 7 of the July 16th letter, it was stated that "the ladder opening between the A train switchgear cooling unit room and the B train switchgear room in the Intermediate Building will be filled in with grout and an opening will be provided between the A train cooling unit and the A train switchgear room for emergency exit." Upon more detailed investigation it was found that obstructions exist, preventing construction of an opening as described. Therefore, as an alternative action an enclosure will be constructed over the ladder opening providing a three hour separation between the A train switchgear cooling unit room and the B train switchgear room. Mr. H. R. Denton August 21, 1981 Page Two

The statement "redundant trains of safe shutdown equipment or cable are not located here," referring to the backup heater transformer area on elevation 436' of the Auxiliary Building, is contained in item 6 of Attachment I of the July 16, letter. This area has been reviewed to identify and locate all circuits required for safe shutdown. This process indicated that there are no mutually redundant circuits within the area. Thus, a fire in the area would not cause any loss of function that would impair our ability to achieve safe shutdown and no additional fire protection is required.

If you have any questions, please let us know.

Very truly yours, A.C. Michhh

T. C. Nichols, Jr.

NEC: TCN: 1kb

Attachment

cc: V. C. Summer G. H. Fischer T. C. Nichols, Jr. H. N. Cyrus J. C. Ruoff D. A. Nauman W. A. Williams Jr. R. B. Clary O. S. Bradham A. R. Koon M. N. Browne B. A. Bursey J. L. Skolds H. E. Yocom T. McAllister J. B. Knotts, Jr. NPCF File

UNITED STATES GYPSUM COMPANY

August 17, 1981

Mr. R.S. Bittle, R.A. Gilbert Associates, Inc. PO Box 1498 Reading, PA 19603

> Re: Three (3) Hour Non-Load Bearing Partition (Estimated Fire Rating)

Dear Mr. Bittle:

1

This is in reference to our recent telephone conversation regarding the subject assembly which consists of the following:

U.S.G. 3-1/2" or 5-1/2", 14 ga. steel studs at 12" and 16" o.c., double layers U.S.G. 1/2" Sheetrock Firecode "C"gypsum board each side of studs, DWC furring channels located horizontally at 16" o.c. each side; single finish layer 1/2" Sheetrock Firecode "C" gypsum board rach side.

Eased upon U.S.G.'s testing experience with fire rated gypsum board partitions including designs similar to the one described, cur Research Dept. believes that the above described assembly using Sheetrock Firecode "C" gypsum panels could be expected to provide at least three (3) hours of fire protection.

Very truly yours,

UNITED STATES GYPSUM COMPANY

Whatton .

Elmslie W. Wharton Technical Representative

EWW/dp