Docket Nos: 50-329

and 50-330

APPLICANT:

Consumers Power Company

FACILITY:

Midland Plant, Units 1 and 2

SUBJECT:

SUMMARY OF MEETINGS HELD WITH CONSUMERS POWER DURING THE WEEK OF APRIL 5, 1982, TO RESOLVE

SER OPEN ITEMS

On April 5 to April 8, 1982, the NRC staff met in Bethesda, Maryland with Consumers Power Company, Bechtel, Babcock & Wilcox, and NUS Corporation to discuss resolution of open items prior to issuance of the Midland SER in May 1982. A list of meeting attendees is attached as Enclosure 1. Enclosure 2 is a detailed summary of the discussions held each day. This summary was prepared by the applicant and has been reviewed by the staff for accuracy. Enclosure 3 is a listing of open and confirmatory item status as of April 12, 1982. Enclosure 4 is the agenda which was published with the meeting notice. Enclosure 5 consists of the specific agenda and handouts for the fire protection review meeting on April 5, 1982.

Ronald W. Hernan, Project Manager Licensing Branch No. 4 Division of Licensing

Enclosures: As stated

cc: See next page

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cc: Lee L. Bishop Harmon & Weiss 1725 I Street, N.W., Suite 506 Washington, D. C. 20006

> Mr. Ron Callen Michigan Public Service Commission 6545 Mercantile Way P.O. Box 30221 Lansing, Michigan 48909

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Director, Citizens Clinic
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Mr. Wendell Marshall Route 10 Midland, Michigan 48640

Mr. Roger W. Huston Suite 220 7910 Woodmont Avenue Bethesda, Maryland 20814

Mr. R. B. Borsum Nuclear Power Generation Division Babcock & Wilcox 7910 Woodmont Avenue, Suite 220 Bethesda, Maryland 20814

Cherry & Flynn Suite 3700 Three First National Plaza Chicago, Illinois 60602 Mr. Don van Farrowe, Chief Division of Radiological Health Department of Public Health P.O. Box 33035 Lansing, Michigan 48909

Mr. Steve Gadler 2120 Carter Avenue St. Paul, Minnesota 55108

U.S. Nuclear Regulatory Commission Resident Inspectors Office Route 7 Midland, Michigan 48640

Ms. Barbara Stamiris 5795 N. River Freeland, Michigan 48623

Mr. Paul A. Perry, Secretary Consumers Power Company 212 W. Michigan Avenue Jackson, Michigan 49201

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Mr. I. Charak, Manager NRC Assistance Project Argonne National Laboratory 9700 South Cass Avenue Argonne, Illinois 60439

James G. Keppler, Regional Administrator
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799 Roosevelt Road
Glen Ellyn, Illinois 60137

LIST OF ATTENDEES

April 5 - April 8, 1982

NRC

- R. Hernan
- W. Reagan
- *E. Adensam
- *D. Muller
- *K. Campe
- *O. Chopra
- *T. Dunning
- *H. Li
- *H. Krug
- *F. Astuzewicz
- *E. Tomlinson
- *R. Eberly
- *J. Mathis
- *R. VanNiel

BECHTEL

- D. Lewis
- H. Fontecilla

CONSUMERS POWER COMPANY

- T. Sullivan
- B. Harshe
- *M. Ferens
- *T. Klompstra
- *R. Hamm
- *K. Terry *J. Pastor
- *R. Huston
- *J. Gribble

NUS

- P. Fulford
- K. Toth

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CONSUMERS POWER COMPANY
Meeting Summary
April 5 - April 8, 1982
Bethesda, Maryland

During the period April 5 through April 8, 1982, the NRC staff met in Bethesda, Maryland with Consumers Power Company (CPCo), Bechtel, and Babcock & Wilcox to discuss the potential outstanding open items for the Midland SER. A list of meeting attendees is attached as Enclosure 1. Enclosure 3 contains a listing of open/confirmatory item status as of April 12, 1982.

All meetings were started with introductory comments stating the meeting purpose, and noting that while draft SER sections have been compiled, they will not be formally issued. In addition to open items in the draft SER sections, the open items in the March 30, 1979 NRC letter (Varga letter) to CPCo were covered. Many of the Varga items have been closed by virtue of updated information provided since 1979, however such closure has not yet been officially documented.

CPCo prepared an open items list from (a) issues identified in preliminary draft SER sections, (b) the NRC March 30, 1979 letter (containing open items), and (c) areas where the review is known to be incomplete. The list was prepared in a format consistent with the format normally used by the staff and was reviewed for completeness by the NRC Licensing Project Manager. The purpose of the meeting was (a) to ensure issues were properly classified, (b) to determine the latest status as determined by the reviewer, and (c) to provide additional information as appropriate. The change in status for numerous items reflects information and work performed since the preliminary draft SER sections were prepared. (In many cases additional information has been formally submitted by CPCo since the draft SER sections were prepared.) In addition, entries in the open items list which are solely cross-references, have been deleted where this could be done without creating confusion. It should be noted that items classed as "tentatively closed" are shown as open items until closure is confirmed by the NRC Project Manager.

The following abbreviations are used in this summary:

OI - open issue in draft SER section 1.7

CI - confirmatory issue in draft SER section 1.8

ASB-1 - open issue, identified by Branch, in NRC March 30, 1979 letter to CPCo

A. SER Section 9.5.1 (Fire Protection) Meeting, April 5, 1982

The meeting concentrated on open items as summarized in the list dated April 5, 1982 (section 9.5.1) and in the meeting agenda prepared by CPCo. The following changes in the list were agreed to:

- 1. The following subparagraphs are considered closed:
 - a. Document that isolating outside hydrants...
 - b. Install listed additional hose stations...

- c. Complete staff evaluation of detectors...
- d. Provide locks for all non-supervisory...
- 2. The subparagraph reading, "Complete staff evaluation of remote shutdown capabilities" should indicate ASB (LeFave) as the responsible branch.
- 3. The following new subparagraphs should be added:
 - a. Provide Protection of Cable Tray Supports (Closed)
 - Provide Fire Protection for Auxiliary Feedwater (445) cabinets (Closed).
 - c. Provide Fire Protection for main control instrument rack rooms.
- The subparagraph reading, "Modify H2 Piping or provide. . ." is considered confirmatory.
- The cross reference in section 9.5.2 and the subparagraph reading, "Conduct fire protection staff review of communications after site visit" should be deleted.

The remaining open items were discussed, using, as a basis, the information in the handout entitled "Resolution of NRC Staff Concerns of the Midland Fire Protection Program" (See Enclosure 5). It was agreed that the information necessary appears to be available, but Staff review is not yet complete. As a result, the category of section 9.5.1 on the open items list has changed from 3a to 5.

In a meeting with CMEB branch management, it was agreed that no explicit commitment to 10CFR50 Appendix R is necessary provided that the information is available to list all deviations from this guidance in the SER. The review of Midland fire protection will be completed during the week of April 19 and another meeting will be held late in that week to resolve any remaining open items.

B. SER Section 2.2 (Site Hazards Meeting), April 6, 1982

The purpose of the meeting was to review the information available regarding the natural gas lines at the Midland site and to agree on what additional work is needed to satisfy NRC concerns.

CPCo described the location, characteristics and uses of the natural gas lines. It was explained that the last segments of the line were installed in November 1981, to support the temporary high pressure boilers and that the permanent auxiliary boilers will be used to bring a unit back on line when thus units are down or to maintain a unit in hot standby.

CPCo also described their experience (better than average) with gas lines, their maintenance and monitoring procedures, and how their number of leaks has decreased through the years. During the last 12 years, 78 leaks have been observed in 1200 miles of pipe. This figure is considered conservative because of the very strict reporting requirements in place.

Company experiences with gas line failures and periodic testing of fire gates show that the gas in all occasions has risen without signs of settling. The reviewer asked whether this information could be documented, and CPCo agreed to provide a letter describing their experience. CPCo indicated their high confidence that a cloud of natural gas would rise above the plant structures. Analyses will be performed by NUS to support this assumption.

No conclusions were reached at this meeting except CPCo needed to provide analyses justifying the position that the gas lines do not represent an undue hazard. CPCo asked to be advised to stop further efforts to justify the acceptability of these lines if it becomes obvious that the NRC will make a negative finding regardless of their outcome.

The meeting was adjourned with plans for a follow up meeting with the Branch Chief the next day.

C. SER Chapter 7 Meeting, April 6, 1982

The draft of Chapter 7 of the SER had not been available prior to this meeting, but the reviewers indicated that it had been completed and was being provided to the Project Manager.

The following items were addressed:

- Section 7.3.3.6 Response time testing. The reviewers indicated that limits will be included in the technical specifications. The item is considered confirmatory.
- 2. Varga items ICSB-6, 7, 8, 9, 10 and 11 are considered closed.
- Varga item PSB-6 is also considered closed.
- Varga item ICSB-12 is to be addressed by the Environmental Qualifications Branch.
- I&E Bulletin 79-21 (Section 7.3.3.1). CPCo had previously agreed to address this issue and indicated that they will provide a letter explaining the intended fixes. This issue is considered confirmatory.
- Low temperature overpressure protection (Section 7.6.2). This issue is also addressed in Section 5.2.2 and RSB-9. This issue is considered closed.
- Control system failures caused by malfunction of a common power source or instrument line (Section 7.7.3). This item is considered confirmatory.

The draft of the SER Chapter 7 addresses several other confirmatory items, and technical specification items. There were no disagreements between the reviewer and the applicant on these issues. The draft SER also addresses the TMI Action Plan Items, which the reviewers indicated are all considered closed.

D. SER Chapter 8 Meeting, April 7, 1982.

A draft of Chapter 8 of the SER, not previously available, was brought to the meeting by the reviewers.

The following items were addressed:

- Section 8.1.4.3, PSB-8. CPCo indicated that Revision 39 of the FSAR addressed the testing of fuses. This item is considered closed.
- Section 8.2.3, PSB-7. CPCo indicated that they have provided an outline of the analyses to be performed, and that the test results will be available in 1983.

It was agreed to delete this item, and instead to list it as Open Item #92 in Section 8.4, "Submit voltage variation analyses and performance testing." This item is considered confirmatory.

3. Section 8.3, PSB-1, Load sequencer. The reviewer indicated that he believed that because of design features of the Midland plant, additional analyses was needed. CPCo responded that they consider their system to be totally adequate, that it meets all requirements, that it has been appropriately tested, and reliability analyses have been performed based on actual experience and have been made available for NRC review. A comparison with instruments installed at the Summer plant was provided not as a basis for acceptability but as additional information. Additional analysis was not justified.

It was agreed that CPCo will submit a letter summarizing all the information relevant to this issue. In the letter, CPCo will also commit to evaluate results from testing done at the Summer station, as available.

CPCo also stated that the components meet all requirements of Appendix B to Part 50. This will be documented in the referenced letter. This item is considered confirmatory.

- 4. Varga Items PSB-2, 6 and 9 are considered closed.
- TMI Action Plan issue II.E.3.1.1. CPCo agreed to provide the reviewer with additional information. This item is considered confirmatory.
- 6. TMI Action Plan issue II.G.1. It was not clear whether the reviewer had seen all the information addressing this issue. CPCo provided the reviewer with a comprehensive package at the meeting which closed the issue.

E. Section 2.2 (Site Hazards) Meeting, April 7, 1982

The purpose of this meeting was to summarize some of the issues pertaining to the review of the natural gas pipelines of the Midland site, and to agree on a course of action for their resolution. Items addressed included the possibility of oil-firing the auxiliary boilers, and the extent to which the State of Michigan Department of Natural Resources or the

Environmental Protection Agency had been requested to allow for oil burning and made aware of the potential increased risks presented by the onsite natural gas. CPCo was also asked to estimate the impact of removing or relocating the pipeline.

CPCo requested to be notified immediately if the NRC reaches the conclusion that the presence of natural gas line on the site is unacceptable. The NRC indicated that this conclusion has not been reached and that the proposed analyses represent the right course of action. NRC also agreed to periodically review the progress of CPCo analyses to assure Staff concerns are taken into account.

F. Chapter 9 Meeting, April 7, 1982

Section 9.5.3. OI-55 is closed.

Section 9.5.4. The entire section is closed. This includes outstanding items 57, 58, 59, 60, 61 and 63. This also includes Varga item PSB-9.

G. SER MTEB Items Meeting, April 7 and 8, 1982

- CPCo will amend FSAR section 5.3.3.9 to discuss personnel qualification and training.
- CI-8 Provide CVN impact data for weld WF-70 (5.3.1). CPCo will provide the unirradiated data for the reviewer. MEB (MI)-2 will be deleted as a separate line item since it is part of OI-29 Demonstrate compliance with fracture toughness requirements of 10CFR50, Appendix G (5.3.1).
- 3. A new CI-21 Preservice inspection relief requests will supersede MEB (MI)-1. This will continue to be carried as a confirmatory item since preservice inspection relief requests for impractical code requirements and the initial inservice inspection program has not yet been submitted. The ISI program will be a license condition.
- There are no open issues in SER section 4.5.1, 4.5.2, 5.2.3, 5.3.1, 5.4.2.1, 6.1.1, 10.2.3, and 10.3.6.

H. Summary Meeting, April 8, 1982

A summary meeting was held between the NRC Project Manager, CPCo Safety and Licensing, and Bechtel Licensing to review the changes to the open items list which resulted from meetings during the preceeding two weeks. During this period, many items were closed or downgraded from open to confirmatory based on NRC staff reviewer input to the NRC Project Manager. For simplicity, the numbering sequence used in section 1.7 of the March 9, 1982 draft SER has continued to be used despite these changes in status.

Each of the open and confirmatory issues from section 1.7 and each of the items from the March 30, 1979 NRC (Varga) letter were reviewed to determine current status. A tabulation of this status was created by the NRC Project Manager and is attached as Enclosure 3. Copies of the handwritten draft of this tabulation were provided to all participants at the end of the meeting. This tabulation represents the "official" status summary; in any case of conflict with the open items list maintained by CPCo, this tabulation takes precedence.

*C=CLOSED

DC=DOWNGRADED TO CONFIRMATORY

LC=LICENSE CONDITION

O=OPEN

O*=LIKELY TO BE OPEN WHEN SER ISSUED

TC=TENTATIVELY CLOSED PENDING STAFF DECISION

TS=TECH SPEC

S=SUPERSEDED

MIDLAND OPEN/CONFIRMATORY ITEM RESOLUTION/STATUS

A. OPEN ITEMS (DRAFT SER)

OPEN ITEM#	CHAPTER/SECTION	STATUS	COMMENTS
1		0*	Natural Gas
2	2.4.2	0	To be addressed in Rev 43
3		0	To be addressed in a letter to NRC
4		C	
5		0	Staff/CPCo disagree
6		TC	Pending review of CFCo letter
7		DC	New Confirmatory Item
8		DC	
9		DC	Absorbed OI 11, 41, MEB-4, MEB-5, CSB-3
10	Part	O Part Do	
11		C	Incorporate into #9
12		0*	Soils-cumulative
13		C	
14		C	
15		C	
16		0*	Seismic Equipment Qualification
17		C	Lumped under #9
18		С	Lumped under #12
19		С	
20		C(?)	
21		0*	Environmental Equipment Qualification
22		DC	Confirmatory Item May close before SER
23		0*	ICC
24		С	
25		C	
26		С	
27		С	
28		TC	
29		С	그리 장의 열 시간 이 사람들이 되었다. 이 경기를 받았다.
30	5.4.7	0	Shutdown from CP - DHR Valves-to be appealed
31	5.4.7	DC	
32	5.4.7	DC	
33	5.4.7	DC	병하다. 경우 하는 사람들은 아이들이 사용하다 되면 하는 것 같다.
34	5.4.7	C	
35		С	
36		DC	
37		TLC	
38		C	

OPEN ITEM # CHAPTER/SECTION	STATUS	COMMENTS
39	C	See Open Item #11
40	TC	Staff to review bolt size vs. shear strength
41	C	See Open Item #9
42	C	See Open Item #21
43	DC	New Confirmatory Item (Pending Staff review)
44	C(TS)	Tech Spec
45	TC	
46	TC	
47	TC	
48	C	
49	C(TS)	Tech Spec
50	C	
51	C	
52	C(LC)	License Condition
53	C(LC)	License Condition
54	0	Dicense vondreivn
55	C	
56	C	
57	C	
58	C	
59	C	
60	C	
61	C	
62	C	Con Open Thom #12
63	C	See Open Item #12
64 10.4.9	0	2nd AFU Down to be seeneded
65		3rd AFW Pump - to be appealed
	DC	New Confirmatory Item
66	C	
67	TC	
68	TC	
69	TC	
70	TC	(PTRB)
71	(?)	
72 14.2	C	Natural Circulation Test
73	TC	
74	TC	
75	TC	
76	C	
77	C C C	
78	C	
79	C	
80	DC	New Confirmatory Item on S/G Inventory
81	TC	Pending receipt of CPCo letter
82	DC	
83	C	
84	Č	
85	TC	
86	C	
87	c	
88 15.7.11	0	Should be LC not OI (SBLOCA Model)
89 17.5	DC	
90	DC	Review/concur with Q-List
10	DC	Downgrade to not

B. CONFIRMATORY ITEMS (DRAFT SER)

CONF.ITEM #	CHAPTER/SECTION	STATUS	COMMENTS
2			
3			
4			
5			
6			
7 8 9			
8			
		C	
10			
11	6.2.7 (GDC51)	TC	Pending Halapatz Review
12			
13			
14		С	
15		C	
16		C	
17		C C	
18		C	
19		TC	Provided in Revision 41
20		С	
NEW CONF.ITEMS			
21	8.2.3		New CI from PSB-7
22			new of from rop-/
23	8.	C	New CI-closed (pzr heaters)
24	5.2.4/6.6	0	New CI - Code relief requests

C. 1979 VARGA ITEMS

OPEN ITEM #	CHAPTER/SECTION	STATUS	COMMENTS
AAB-1	15.6	С	
AAB-2	15.6(?)	C	
AAB-3	3.5.1.3	C(S)	Open in current SER
AAB-4	6.4	C	
ETSB-1	11.3	C	
ETSB-2	11.5	C	
ETSB-3	11.4	C	
ETSB-4	11	C	
ETSB-5	11	C	
ICSB-1	3.10/3.11	0(S)	Equipment Qualification - covered
	3.10/3.11		in current SER
ICSB-2		C	N/A
ICSB-3	7.2	C(S)	Addressed in Current SER
ICSB-4	7.1	C(S)	Confirmatory item or TS in current SER
ICSB-5	7.5	C(S)	Superseded by current SER (TMI Items)
ICSB-6	9.5.2	C	
ICSB-7	7.1	C(S)	
ICSB-8		C	
ICSB-9	7	C(S)	Addressed in current SER
ICSB-10	7	C(S)	Addressed in current SER
ICSB-11	7	C(S)	Addressed in current SER
ICSB-12	3.11	C(S)	
PSB-12	8.3	C(S)	SER Section 3.11 (Equip. Qualif.) See CI #22
PSB-2	8.3		See C1 #22
	9.5.4	C	Codia - Con Open Thom #12
PSB-3		C(S)	Soils - See Open Item #12
PSB-4	10.3	C	
PSB-5	8.2, 15.3 (?)	C	
PSB-6	7.0, 8.3	C	V 07 401
PSB-7	8.2.3	C(S)	New CI #21
PSB-8	9.1.4.3	С	
PSB-9	9.5.4	C	
CPB-F-1	4.2	C(S)	See draft SER OI#9
CPB-F-2	4.2	С	
CPB-F-3	4.2	C(S)	Covered in current SER
CPB-F-4	4.2	C	Closed-discussed in current SER
CPB-F-5	4.2	C	Closed-discussed in current SER
CPB-PH-1	4.2	C	Closed by April 25, 1979 internal memo
ASB-1	3.6.2	C	
ASB-2	9.1.4	C	그 아이 아이들이 없는 그 그 아이는 아이들이 없다면 없다.
ASB-3	9.2.2	C	
ASB-4	9.3.4	DC	ASB (LeFave)
ASB-5	9.4.3	С	
ASB-6	9.5.1	C(S)	Superseded by Fire Protection Open Items
ASB-7	?	C(S)	Soils - Open Item #12

OPEN ITEM #	CHAPTER/SECTION	STATUS	COMMENTS
CSB-1	3.10, 3.11	C(S)	Equip. Qualif See current SER
CSB-2	5.	С	
CSB-3	6.	C(S)	See draft SER Open Item #9
CSB-4	6.2	C	
CSB-5	6.8	C(S)	Confirmatory Item in current SER
CSB-6		0	CSB
MEB-1	3.10	C(S)	See 3.10
MEB-2	3.9	C	
MEB-3	3.9	C	
MEB-4	3.9	C(S)	See draft SER Open Item #9
MEB-5	3.9	C(S)	See draft SER Open Item #9
MEB-6	3.6	0	CPCo considers closed - see 5/15/79 meeting summary
MEB-7	3.9.6	C	
MEB-8		C	
MEB-9	3.9.3	TC	
RAB-1	12.3	C	
RAB-2	12.3	С	Addressed in current SER
MB-MET-1	6.	TC	Pending Halapatz review of CPCo letter
MB-MI-1	5.2.4	C(S)	In current SER IS1 LC
MB-MI-2	3.2	C(S)	Superseded by draft SER 01#29
MB-MI-3	5.9.2	C(S)	Superseded by new Tech Spec
HMB-1		C(S)	See draft SER OI#2
HMB-2		C	N/A
HMB-3		0	HGEB
HMB-4		0	HGEB
HMB-5		0	HGEB
QA-1	13.1	C	
QA-2	17.2	С	Questions on Table 3.2-1 given to CPCc
QA-3	14	C(S)	Superseded by Ch. 14 SER input
QA-4	17.	C	N/A
GS-1	2.5.2	C(S)	See current SER
GS-2	2.5.2	C(S)	See current SER
GT-1	2.5	C(S)	Scils - See Open Item #12
GT-2	2.5	C(S)	Soils - See Open Item #12
GT-3	2.5	C	
SEB-1		C(S)	See SER Open Item #12
SEB-2		0	SEB
SEB-3		C(S)	See SER Open Item #12
SEB-4	3.7	C(S)	See SER Open Item #12
SEB-5	3.7	0	SEB
RSLB-1	13.6	C(S)	
EP-1		C(S)	
EP-2		C(S)	
EP-3		C(S)	
EP-4		C(S)	Superseded by current SER
OLB-1	13.2	C	
OLB-2	13.2	C	

AGENDA

Monday, April 5, 1982

1:00 p.m. - 4:00 p.m.

Subject: Fire Protection - SER Section 9.5.1

Participants: NRC

CPCo

R. Eberly R. Hernan

T. Sullivan R. Teuteberg

D. Perry

R. Huston

Tuesday, April 6, 1982

8:30 a.m. - 11:45 a.m.

Subject: Sections 2.2, 6.1 and 6.4

Participants: NRC

CPCo

K. Campe

H. Krug

C. McCracken

R. Hernan

T. Sullivan

B. Harshe

M. Ferens
J. Gribble

J. Pastor

T. Klompstra

1:00 p.m. - 4:00 p.m.

Subject: Instrumentation and Control (Chapter 7) and remaining sections of

Chapters 9 and 10

Participants: NRC

CPCo

H. Li

E. Tomlinson R. Hernan

B. Turlovin

B. Harshe

T. Sullivan

K. Terry

J. Pastor

R. Hamm

T. Klompstra

Wednesday, April 7, 1982

8:30 a.m. - 11:45 a.m.

Subject: Power Systems (Chapter 8)

O. Chopra

R. Hernan J. Knight

Participants: NRC

CPCo

T. Sullivan

B. Harshe

K. Terry

M. Ferens

J. Pastor

Wednesday, April 7, 1982 (Con't)

1:00 p.m. - 4:00 p.m.

Subject: Chapter 13 (Except Emergency Planning), Chapter 18 and Physical Security

Participants: NRC

CPCo

V. Deliso (OLB)
L. Crocker (DHFS)
R. Hernan
B. Elliot

T. Sullivan B. Harshe K. Terry

S. Howell R. Huston H. Slager

Thursday, April 8, 1982

8:30 a.m. - 4:00 p.m.

Subject: All remaining MTEB Items

Participants: NRC

CPCo

J. Schiffgens
D. Smith
D. Sellers
M. Hum
R. Hernan

T. Sullivan H. Slager L. Gibson

RESOLUTION OF NRC STAFF CONCERNS ON THE MIDLAND FIRE PROTECTION PROGRAM

MIDLAND UNITS 1 AND 2

MEETING AGENDA April 5, 1982

- Supervision of Sectional and Control Valves and Hydrant Isolation
- Manual Fire Suppression Hose Stations
- Use of CO2 Hose Reels
- Additional Automatic Fire Detection for Safety-Related Equipment Areas
- Fire Barriers and Fire Barrier Penetrations
- Providing Protection of Cable Tray Supports
- Separation of Control Room From Peripheral Rooms
- Total Flooding Halon System in Control Room Ceiling
- Flow Restriction Valve in the Hydrogen Supply System
- Fire Protection Features for the Main Control Instrument Rack Rooms
- Fire Protection Features for the Auxiliary Shutdown Panel Rooms
- Commitment to Appendix R or Provide Equivalent Protection