Florida Power
CORPORATION

December 29, 1982
3F-1282-25

Mr. Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
Generic Letter 81-12 on Fire Protection

Dear Mr. Eisenhut:

Florida Power Corporation requests an exemption to the requirements of the second paragraph of Section III.G.3.b of Appendix R to 10CFR50 which states, "In addition, fire detection and a fixed fire suppression system shall be installed in the area, room, or zone under consideration." Florida Power has installed a fire detection system in the Control Room but will not install a fire suppression system.

Our fire protection plan for the Control Room remains as described in our Fire Protection Program Review for Crystal River Unit 3, submitted to you in June 1977. The description is as follows:

CRYSTAL RIVER UNIT 3
FIRE SAFETY EVALUATION

Control Complex
Elevation 145'0"
Area/Zone 5

Control Room
(Safety-Related)

A006

Area/Zone Description

The control room is bounded by three-hour-rated fire walls and fire doors separating it from the remainder of the plant. Safety-related cable trays in the room are widely separated. A small amount of cabling which terminates in the control room is concealed above the ceiling. The rear of the control board is open which will allow a fire condition in cabinet wiring to be detected by installed detectors. Personnel constantly occupy the room and in the event the control room is uninhabitable, the plant can be shutdown from outside the control room.

Major Equipment

Control Board
NI&P Cabinets
Engineer Safeguards Actuation Relay and Channel Cabinets
Fire Cabinets
ANN/Events Recorder
ICS and NNI Cabinets
Computer Typewriter, Line Printer and Cabinets
Radiation Monitoring Console

Combustible Material	Quantity	Fire Load	Maximum Fire Severity
Cable Insulation	8 ft^3	2,100 Btu/ft^2	17 min
Paper	60 ft^3	3,600 Btu/ft^2	
Cabinet and Console Cable Insulation	63 ft^3	17,000 Btu/ft^2	

Fire Protection

Automatic fire detection is provided for the control room area with nine POC detectors and one heat detector. Three 25-lb Type ABC portable extinguishers (Station C5-2, -4, -5) are provided with three additional extinguishers stored in the corner of the room. Fire stops are provided for the cable trays and ventilation system fire dampers are provided. Fire indication panels are present in the room for plant fire protection systems with remote operational capability for various systems.

Postulated Fire

Ignition of cabinet wiring or stored paper.

Consequence of Fire Without Active Protection

A fire condition in the control room could cause uninhabitable conditions, but in which case the reactor could be safely shutdown from remote stations. Spread of fire from the area is prevented by three-hour-rated fire walls, doors, cable tray fire stops and ventilation system fire dampers. Since this area is continually occupied by operating personnel, a fire condition would be promptly discovered.

Consequence of Fire With Active Protection

Fire detection is present to provide prompt automatic detection of a fire condition. Portable extinguishers are available throughout the room for manual fire fighting; if required, water hose can be brought in from the Turbine Building. Damage or uninhabitable conditions in the room due to fire or fire fighting does not prevent safety plant shutdown, since additional capability exists outside the control room.

Your consideration of this exemption request is appreciated.

Very truly yours,

J. A. Hancock
Vice President
Nuclear Operations

WRK:mm

cc: Mr. J. P. O'Reilly, Regional Administrator
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