

INFORMATION REPORT

July 26, 1982

SECY-82-13C

For: The Commissioners

From: William J. Dircks
Executive Director for Operations

Subject: FIRE PROTECTION RULE SCHEDULES AND EXEMPTIONS
(QUARTERLY REPORT NO. 6)

Objective: To inform the Commission of the status of the implementation of 10 CFR 50.48 and Appendix R to 10 CFR Part 50, for the quarter ending June 30, 1982, as requested by a November 3, 1980, memo from Samuel J. Chilk to William J. Dircks.

Discussion: On February 17, 1981, the fire protection rule for nuclear power plants, 10 CFR 50.48 and Appendix R to 10 CFR 50, became effective. This rule required all licensees of plants licensed prior to January 1, 1979, to submit by March 19, 1981: (1) plans and schedules for meeting the applicable requirements of Appendix R, (2) a design description of any modifications proposed to provide alternative safe shutdown capability pursuant to Paragraph III.G.3 of Appendix R, and (3) exemption requests for which the tolling provision of Section 50.48(c)(6) was to be invoked.

Exemption requests and modifications to provide alternative shutdown capability to satisfy the requirements of Appendix R, Section III.G require NRR review and approval. Implementation of Appendix R sections other than III.G do not require NRR review or approval. However, the Regional Offices will inspect the facilities for compliance after modifications have been implemented.

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The current status of the implementation of Appendix R is given in the attached five tables. Three plants require no further staff evaluation. Of the remaining 66 plants, 43 have requested 347 exemptions of which 21 have been approved, 30 denied, and 283 are still under review. Four exemption requests were withdrawn and nine were found unnecessary.

There remain 21 plants from which the required Appendix R information was not received by June 30, 1982. (Of these the staff did receive responses from 19 as of July 15.) The staff indicated a schedule for completion of its review by the end of calendar 1982. Because of delays in licensee submittals the staff now expects completion of 56 of 69 of its plant reviews in 1982.

Table 1 lists the 31 plants for which we have not yet received the licensee's reanalysis of compliance with Appendix R Section III.G, III.J, or III.O.

Table 2 lists the 21 plants for which we have exemption requests under review. Our review has not yet been completed and exemptions or denials have not yet been issued. Note that denial of some of these exemption requests may require the licensee to propose alternative shutdown capability which will require further staff review per Appendix R.

Table 3 lists the 30 plants for which we have received descriptions of shutdown capability modifications. Our review has not been completed and/or an SER has not been issued. For 13 plants, the staff has received sufficient information for its review and expects to complete the review by September. For the remaining 17, staff review will be complete 90 days after receipt of a complete package.

Table 4 lists the 3 plants for which we do not have exemption requests or shutdown capability modifications under review. We have either completed our review or the licensee required no modifications or exemptions. The Regional Offices will schedule an inspection following the completion of the required modifications.

Table 5 provides a summary of licensee exemption requests for the period ending June 30, 1982.

The letter discussed in and attached to SECY-82-13A has been sent to the licensees during April and May 1982. They require the completion of all submittals no later than July 1, 1982 or 60 days after receipt of letter whichever is longer. These letters inform the licensee that, if the staff finds the submittal incomplete, the licensee may be subject to a civil penalty. The staff is developing a plan to be used to enforce this requirement.

IE has issued a draft procedure for the inspection of the three backfit items of Appendix R (III.G Fire Protection of Safe Shutdown Capability, III.J Emergency Lighting, and III.O Oil Collection System for Reactor Coolant Pump) to NRR and the Regional Offices for comment by July 9, 1982. Following incorporation/resolution of comments, the inspection procedure will be made available for use by the Regional Offices. The Regional Offices will be responsible for scheduling inspections at individual facilities following completion of approved fire protection modifications.

The D. C. Cook facility was inspected by a Region III, IE and NRR inspection team for compliance with fire protection requirements during the period April 12 to 16, 1982 using the draft inspection procedure. A number of items of noncompliance were identified. Region III is reviewing the results of this inspection for possible enforcement action. The staff has met with D. C. Cook representatives to discuss the corrective actions taken or planned as a result of this inspection. The subjects discussed included: (a) reanalysis for conformance with Section III.G of Appendix R, (b) deficiencies in post-fire shutdown procedures, (c) training of personnel in post-fire shutdown procedures, (d) deficiencies in the reactor coolant pump oil collection system, and (e) deficiencies in the emergency lighting.

Summary:

As of June 30, 1982, licensees for 31 plants have not yet completed their response to 10 CFR 50.48. Exemption requests for 21 plants are under review. Shutdown capability modifications for 29 plants are under review. NRC Regional Offices will schedule inspections of the first three plants following issuance of the approved inspection procedures and completion of the modifications.



William J. Dircks
Executive Director for Operations

Enclosures:
Tables 1 thru 5

Table 1.

Plants which have not yet provided required response concerning III.G, III.J and III.O as of June 30, 1982.

<u>Plant</u>	<u>Response Scheduled</u>
Arkansas 1	July 1, 1982*
Arkansas 2	July 1, 1982*
Beaver Valley 1	July 1, 1982
Browns Ferry 1, 2, 3	June 30, 1982*
Brunswick 1, 2	June 30, 1982***
Cook 1, 2	December 1983**
Cooper	June 30, 1982
Crystal River 3	June 30, 1982
Farley 1, 2	July 1, 1982*
Hatch 1, 2	July 1, 1982
Indian Point 3	July 1, 1982.
Maine Yankee	November 14, 1982*****
Monticello	July 1, 1982
Oyster Creek	July 1, 1982
Peach Bottom 2, 3	June 30, 1982****
Pilgrim 1	June 30, 1982****
Point Beach 1, 2	June 30, 1982****
Prairie Island 1, 2	July 1, 1982
San Onofre 1	July 1, 1982
Three Mile Island 1	July 1, 1982*
Turkey Point 3, 4	July 1, 1982*

- * Revised from last report.
- ** Request by licensee; not approved by NRC.
- *** Received as scheduled.
- **** Mailed by licensee but not received.
- ***** Alternate safe shutdown design must be changed as described in our May 19, 1982 denial of their exemption request.

Table 2

Plants which have exemption requests under review.

<u>Plant</u>	<u>Number of Requests</u>	<u>NRR Completion Scheduled</u>
Brunswick 1, 2	1	July 1982
Calvert Cliffs 1, 2	16	July 1982**
Duane Arnold	34	August 1982
Farley	1	August 1982
Fitzpatrick*	2	July 1982**
Haddam Neck*	15	July 1982**
Millstone 1, 2*	19	August 1982**
Point Beach 1, 2	8	August 1982**
Prairie Island 1, 2	4	July 1982
Robinson 2	5	August 1982**
Salem 1, 2	20	September 1982**
Rancho Seco*	6	July 1982**
St. Lucie 1	38	October 1982**
Three Mile Island 1	7	July 1982
Trojan	1	July 1982

*Denial of exemption request may require modifications to provide alternative shutdown capability.

**Revised from last report.

Table 3

Plants which have shutdown modifications under review.

<u>Plant</u>	<u>Status</u>	<u>NRR Completion Scheduled</u>
Big Rock Point	**	***
Calvert Cliffs 1	*	July 1982
Calvert Cliffs 2	*	July 1982
Dresden 2, 3	**	***
Duane Arnold	**	***
Fitzpatrick	**	***
Ft. Calhoun 1	*	July 1982
Genoa	**	***
Indian Point 2	**	***
Lacrosse	**	***
Nine Mile Point 1	**	***
North Anna 1, 2	*	September 1982
Oconee 1, 2, 3	**	***
Palisades	**	***
Prairie Island 1, 2	**	***
Quad Cities	**	***
Robinson 2	*	September 1982
Salem 1, 2	*	September 1982
Surry 1, 2	*	July 1982
Vermont Yankee	*	September 1982
Yankee Rowe	**	***
Zion 1, 2	*	September 1982

* Under final review.

** Initial review completed; we need additional information.

*** We need additional information or we expect that we will need additional information. Review will be complete 90 days after the receipt of needed information.

Table 4

Plants for which NRR reviews are completed or exemptions were not requested.

<u>Plant*</u>	<u>Modification** Required</u>
Ft. St. Vrain	No
Kewaunee	Yes
Davis Besse 1	Yes

* D. C. Cook was inspected on April 12-16, 1982. Because items of noncompliance were detected, D. C. Cook has been reclassified (See Table 1).

** Inspections will be scheduled after completion of necessary fire protection modifications.

Table 5

Summary of Exemption Requests-Technical
Requirements of Appendix R to 10 CFR 50

No. of plants requesting exemptions	43
No. of exemptions requested	347
No. of exemptions approved	21
No. of exemptions denied	30
No. of exemptions undecided	283
No. of exemptions withdrawn	4
No. of exemptions not needed	9