

OWER COMPANY NORTHERN

MINNEAPOLIS MINNESOTA BEAUI

November 22, 1976

Regulatory Docket File

Mr Victor Ste" o, Director Division of ____rating Reactors U S Nuclear Regulatory Commission Washington, DC 20555

Dear Mr Stello:

05160417

MONTICELLO NUCLEAR GENERATING PLANT Docket No. 50-263 License No. DPR-22

> Additional Information On Fire Protection Practices

References: (a) Letter dated May 11, 1976 from Victor Stello (USNRC) to L O Mayer (NSP)

- (b) Letter dated June 3, 1976 from L O Mayer (NSP) to Victor Stello (USNRC)
- (c) Letter dated September 30, 1976 from Karl R Go? er (USNRC) to L O Mayer (NSP)

Reference (a) requested that we conduct an examination to compare the existing fire protection provisions at this facility with the guidelines of Standard Review Plan 9.5.1. Reference (b) stated that a date of December 3, 1976 had been scheculed for submittal of the requested information. This review has been underwa/ since May and we expect to have the information ready for submittal within a week of the originally scheduled date.

Reference (c), which was not received until October 13, 1976, requested that we conduct a fire hazards analysis based upon additional guidance provided in Enclosure 2 to that letter. This specific type of analysis was not contemplated in the scope or schedule for the review that has been underway in response to Reference (a). We have retained the original plant Architect/Engineer organization to perform a fire hazards analysis for this facility. The proposal received from the consultant has resulted in the establishment of a scheduled date of March 12, 1977 for submittal of the fire hazards analysis.

Reference (c) further requested that we propose fire protection technical specifications and include them with the response to our presently scheduled submittal. We believe that the request to submit fire protection technical specifications is premature. In our opinion, a more appropriate program would be for the licensee

11966

Mr Victor Stello Page 2 November 22, 1976

to make the various required submittals, have the NRC complete the necessary reviews, reach agreement on those physical and procedural changes that are necessary for the protection of the health and safety of the public, and then develop the required technical specifications based upon the modified fire protection provisions. During the above review period, it would be appropriate for the NRC to prepare draft guidance for the content of fire protection technical specifications and allow a period of time for industry comment prior to licensee submittal of proposed technical specifications.

A comprehensive program of periodic inspections and surveillance testing is being conducted for existing fire protection equipment at this facility. These include fire protection system tests, diesel fire pump tests, transformer deluge tests, hose station and portable fire extinguisher inspections, smoke detector tests, etc. Descriptions of the scope and frequency of these surveillance programs are described in a letter dated December 5, 1975 to Mr J G Keppler, IE-III in response to IE Bulletin 75-048. Many of these surveillance tests are not of a nature that could be categorized as suitable for technical specifications. We believe, however, that the existence and use of these surveillance tests, which can be audited by NRC/IE-III inspectors, provides assurance that the existing fire protection systems will perform their intended function.

Reference (c) further requested that we inform you of the date we intend to meet Section B of Appendix A "Administrative Procedures, Controls and Fire Brigade". We intend to evaluate our programs in this area in conjunction with the fire hazards analysis studies and will provide a response with the latter submittal.

Yours very truly,

X.O. mayor

L O Mayer, PE Manager of Nuclear Support Services

LOM/deb

cc: J G Keppler G Charnoff MPCA Attn: J W Ferman

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