#### ENGINEERING ASSESSMENT

## TURBINE BUILDING FIRE AREA IE

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# ENGINEERING ASSESSMENT TURBINE BUILDING FIRE AREA IE APPENDIX R DETECTION AND SUPPRESSION

#### 1.0 PURPOSE

This engineering assessment will examine the adequacy of the existing fire detection and suppression capabilities in Turbine Building (Fire Area IE) necessary to assure the available of Appendix R hot and/or cold shutdown capabilities.

## 2.0 RATERDASEN

- 1. RC Gene c Letter 86-10 "Implementation of Fire Protection Requirements" dated April 24, 1986.
- James A. FitzPatrick Nuclear Power Plant Fire Hazards Analysis revised October 1985.
- 3. James A. FitzPatrick Nuclear Power Plant Evaluation of the Compliance to Appendix R Section III.G. October 1985.
- 4. Minor Modification Package M1-91-179, "Isolation of UC-16A and 16B Fans."
- 5. NYPA letter, J.P.Bayne to H.R. Denton, dated July 13, 1982 (JPN-82-061) submits "A Reassessment of Conformance to Appendix R." This report supersedes Appendix II to the Safe Shutdown Analysis in its entirety.
- 6. NRC 2/2/83 letter (JAF-83-44) D.B. Vassallo to L.W.Sinclair, regarding draft safety evaluation on Appendix R exemption requests. Letter requests that the Authority review the draft report for technical accuracy and inform the NRC of any corrections necessary within three weeks. The draft report recommends the denial of exemptions for four zones in the reactor building while granting exemptions for five other areas.
- 7. NRC 7/1/83 (JAF-83-235) letter, D.B. Vassallo to J.P. Bayne, regarding exemption requests 10 CFR 50.48 Fire Protection and Appendix R to 10 CFR 50. Transmits NRC Exemption for the Control Room and Torus Room in response to the Authority's request.

## 3.0 INTRODUCTION

Calculations performed to predict the temperature in the East and West Electric Bays indicate that if power to the ventilation fans is lost, temperatures could exceed 150 degrees F. However, these calculations are based on "worst-case" assumptions (i.e. hottest day, maximum solar heat load, normal "operating" heat loads, 80 degree F lake water temperature, etc.). The ability of all equipment in the electric bays to operate at these temperatures cannot be assumptions may render this modification unnecessary for either hot and/or cold shutdown conformance strategies.

Equipment in the bays is required to shutdown the plant in the event of a fire. A fire in either the Control Room or Turbine Building could damage electrical cables "associated" with the electric bay fans. As a result, the Authority modified the electrical circuitry associated with these fans to assure their availability in the event of a fire.

Panels 67HV-2A and 67HV-2B provided local control of Electric Bay fans 67FN-16A1 and 67FN-16A2 and 67FN-16B1 and 67FN-16B2 respectively. In the event of a fire in Fire Area VII (Control Room, Relay Room or Cable Spreading Room) prior to the modifications, a short circuit in the annunciator and light circuit for fans 67FN-16B1, 67FN-16B2, 67FN-16A1 AND 67FN-16A2 could blow the control power fuses and cause the fan to be inoperable. Without an operable fan, the temperature in the electric bay will increase and may cause the equipment in the bay to potentially overheat and fail.

A fire in the Turbine Building (Fire Area 1E) could damage two local control panels (67HV-2A and 67HV-2B), which could result in electric bay fans 67FN-16A1, 67FN-16A2, 67FN-16B1 AND 67FN-16B2 being made inoperable and overheating electric bay equipment.

To assure that fans will function in the event of fire in either the Control Room or Turbine Building, modification M1-91-179 (Reference 4) eliminated all control of Electric Bay Ventilation fans 67FN-16B1 and 67FN-16B2 from the Control Room, and 67FN-16A1 and 67FN-16A2 from the local area.

## 4.0 ANALYSIS

## 4.1 Applicable Regulatory Criteria

## Appendix R to 10CFR50

Section III.G.3 of Appendix R to 10CFR50 requires detection and fixed suppression in locations where alternate capability is provided to ensure safe shutdown capability prior to the transition to cold shutdown.

Prior to the modification of the electric bay ventilation system circuitry (Reference 4), the Authority relied upon circuit separation. With the installation of this modification, FitzPatrick now falls within the provisions of Section III.G.3 and III.L of Appendix R to 10CFR50 based on the assumption that electric bay ventilation is required prior to the transition to cold shutdown.

Section III.G.3 requires that detection and fixed suppression be installed in areas, rooms, or zones where alternate shutdown capability is required. As outlined in Generic Letter 86-10 (Reference 1), less than total detection and total suppression in the area, room, or zone can be adequate if justified by analysis; however, if either no detection or no suppression is provided in the location under consideration, an exemption is required.

## 4.2 Assessment of Turbine Building (Fire Area IE)

The equipment for which alternative shutdown capability is provided, given a fire in Fire Area IE, consists of local control panels 67HV-2A and 67HV-2B located along column line 19 on the outside of the north wall of the Electric Bays. The immediate vicinity of ventilation equipment between columns 19-20/A-B without detection or suppression contains negligible quantities of exposed combustible material. A small caged area is used to store radioactive materials, primarily noncombustible material. An approved flammable liquids storage cabinet is also in this location. There are no other potential sources of combustible materials within these column lines. The modifications described in Reference 4 did not introduce any additional combustible materials into the location of concern.

Therefore, the location contains minimal quantities of exposed combustible material, and the probability of damage due to a fire either starting in or spreading to this location is considered highly unlikely.

The existing configuration of fire protection features in Fire Area IE are documented in Reference 2. The immediate vicinity of ventilation equipment between column lines 19-20/A1-B contains no detection or suppression capabilities. Open areas of elevation 272'-0" which can present an exposure fire hazard to the location of concern are protected by automatic sprinklers. Automatic detection is not provided in the open areas of elevation 272'-0" which can present an exposure fire hazard to the location of concern. Potential fire scenarios involving exposed combustible materials in these adjacent locations would result in suppression system actuation. Sprinkler system water flow would result in a local alarm and an alarm in the Main Control Room, resulting in dispatch of the fire brigade. Suppression system actuation would act to control and/or extinguish the fire prior to arrival of the fire brigade.

The existing configuration of automatic detection and suppression in Turbine Building Fire Area IE in order to support conformance with Appendix R Section III.G.3 is acceptable "as is". The bases for this assessment are a combination of the fire hazards in the location of concern, existing protection provided for exposure fire hazards, and the ability to establish ventilation to the East or West Electric Bays independent of the location of concern. Even should damage occur, there will be no impact on safe shutdown capability since the modification described in Reference 4 ensures the availability of ventilation to the East Electric Bay, which is associated with the Main Control Room shutdown path.

## 4.3 Assessment of Control Room (Fire Area VII)

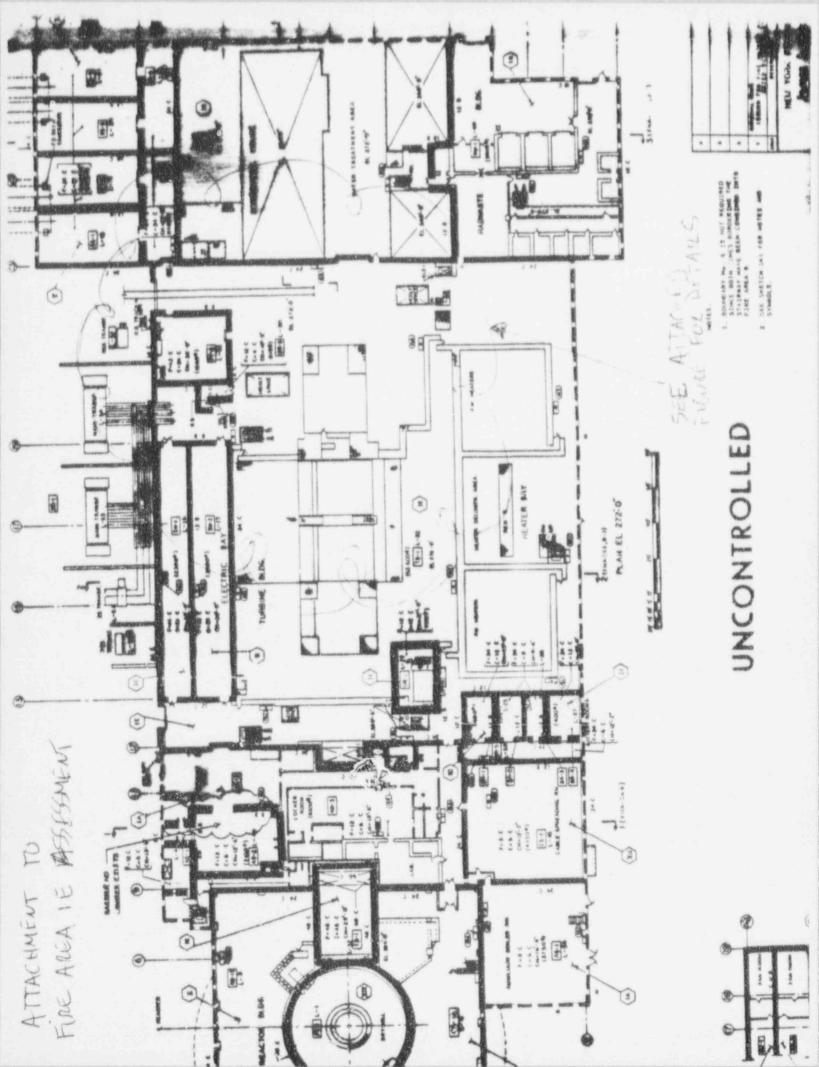
An exemption has been granted for the lack of Hain Control Room detection and suppression under III.G.3 alternate shutdown criteria (Reference 5,6 and 7). Therefore, further review of the Main Control Room is not required.

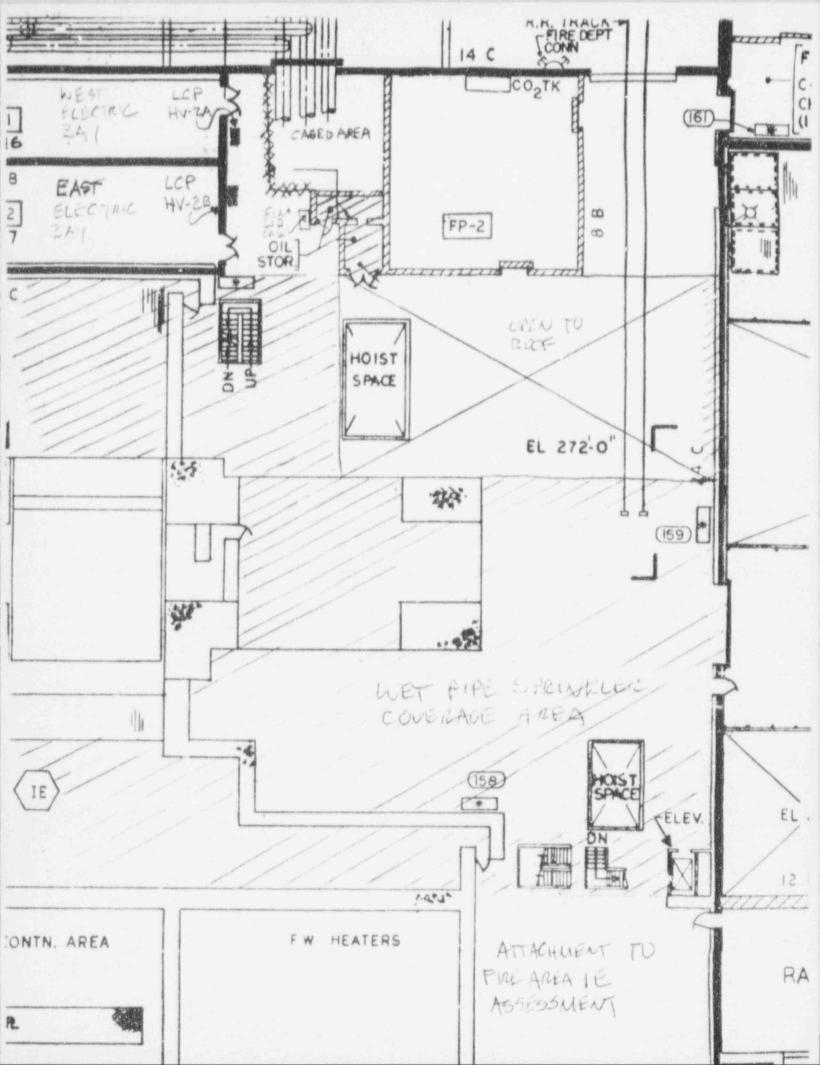
#### 5.0 CONCLUSION

Based on the results of the preceding assessment, the existing configuration of fire protection features provides adequate protection for the location of concern. The bases for this conclusion are summarized as follows:

- There are minimal exposed combustible materials in the immediate vicinity of the location of ventilation equipment for which alternative shutdown capability is provided.
- Adjacent locations on elevation 272'-0" of Turbine Building Fire Area IE that contain significant exposure fire hazards are protected by automatic wet pipe sprinkler systems.
- Actuation of suppression systems in adjacent locations would act to control and/or extinguish postulated fires prior to arrival of the fire brigade.
- Due to the location and protection provided for exposed combustible materials, damage due to a fire occurring in or spreading to the location under consideration is considered to be highly unlikely.
- Even should fire damage occur in the location under consideration, there will be no impact on safe shutdown capability since the availability of ventilation to the East Electric Bay is provided outside of Turbine Building Fire Area IE.

Providing additional detection and/or suppression capabilities in the location under consideration does not result in a significant improvement to existing fire protection features.





ATTACHMENT TO FIRE AREA IT ASSESSMENT

FIRE HAZARD ANALYSIS SUMMARY SHEET (Cont'd)

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FHA															Type of	Fire Suppl	reasion	
	Fire	Fire	£1	Col.	Plant Area Identification	Safety Criteria	Area Sq.Ft.	Material	Quantity Lb.	Loading Btu/Ft <sup>2</sup>	Total Btu's	Total Btu/Ft <sup>2</sup>	Btu/Ft2	Primary	Actuation	Backup	Betection	e there
					Battery Charging Room	SR	400	Cable insulation	2,867	86,010	34.4x10 <sup>6</sup>	86,010	153,990	Water hose station	Manual	Portable CO <sub>2</sub>	Ionization	10
SKI	IE	OR-1	252	13-8	Turbine Oil Room	NSR	770	Lube oil	216,000	5.72×10 <sup>6</sup>	4.40×10 <sup>9</sup>	5.72×10 <sup>6</sup>	-0-	Wet pipe sprink.	Fusible link station	Water hose	Sprinkler alarm	6
SK2	IE	OR-2	272	13-X	Poor	NSR	770	Lube oil	84,000	2.23×10 <sup>6</sup>	1.72×10 <sup>9</sup>	2.23×10 <sup>6</sup>	-0-	Wet pipe sprink.	Fusible link	Water hose station	Sprinkler aler-	6
SK2	IE	GR-3	272	22-B	Misc. Oil Storage	NSR	110	Misc. oil	400	107,368	11.8×10 <sup>6</sup>	107,368	12,632	Wet pipe sprink.	Fusible link	Water hose station	Sprinkler alarm	
SKI	IE.	TB-1 (TB-1		16-T	Turbine Bldg	NSR	54,000	Resin Cable insulation	57,532	232,783	391x1/2 <sup>6</sup> 690x10 <sup>6</sup>	31,081	208,919	Wet pipe	Fusible link	Water hose	Sprinkler alarm	
		4	VA	77.30	of ON	ÉlV	1,400 540 2,062 222	Lube oil Lube oil Lube oil Lube oil Lube oil Lube oil	944 1,080 14,400 288	40,800	5.88x10"			sprink.		station		
SK2		TB-1	272		Turbine Bldg		53,600	Lube oil	44,504	9,964	534x10 <sup>6</sup>	24,942	215,058	Wet pipe	Fusible link	Water hose	Sprinkler alarm	8, 16
> \_		(TB-1	2)				150 500	Cable Misc oil Wood Plastic	59,655 1320 3000 3000	179,520 48,000	716x10 <sup>6</sup> 26.9x10 <sup>6</sup> 24x10 <sup>6</sup> 36x10 <sup>6</sup>			sprink.		station		
TSK3	IE	TB-1 (TB-1		16-7	Turbine Bldg Op. Floor	NSR		Lube oil Cable insulation	9,186	10,095 168,035	6.85×10 <sup>6</sup> 110×10 <sup>6</sup>	2,184	237,816	Water spray	Manua l	Water hos.sta.	Elec. HAD	,

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ATTACHMENT 1 Sheet 6 of 8

## FIRE HAZARD ANALYSIS SUMMARY SHEET (Cont'd)

		FHA		6									**	Total	*Avail.		Type of I	ire Suppr	ession	
		-	Fire	Fire	FI	Col.	Plant Area Identification	Safety Criteria	Area Sq.Ft.		Quantity Lb.	Loading Btu/Ft <sup>2</sup>	Btu's	Btu/Ft <sup>2</sup>	Btu/Ft <sup>2</sup>	Primary	Actuation	Backup	Betection	**Note
(	0. V4				244		Condenser Pit		6,600	Lube oil		333,818	2.2x10 <sup>9</sup>	333,818		foam.		station	elarm	)
	5	SK3		MG-1	300	6-T	Motor Gen.Room	MSR	5,330	Lube oil	19,125	73,199	390x10 <sup>8</sup>	73,199	166,801	Preact. sprink.	Elec. HAD/ fus. link		Sprinkler alarm & UV	
	6	SK4	-B	SP-1	255	24-A	Safety Related Pumps	SR		Labe oil Cable	114 334	2,619 75,423	2.23x10 <sup>6</sup> 4.0x10 <sup>6</sup>	7,104	232,896	Water hos.st#		COS	Ionization & elect. H	AD
	7	SK1	XIII	SP-2	255	26-A	Safety Related Pumps	SR	5.3	Lube oil Cable insulation	114 405	1,703 91,671	2.33x10 <sup>6</sup> 4.86x10 <sup>6</sup>	5,412	234,588	Water hos.sta		Portable CO <sub>2</sub>	Jonizati A & elect. H	AD
	8	SK1	IB	CR-2	284	24-C	Radwaste Control Room	NSR		Paper,etc.		1,439	2.0x10 <sup>6</sup>	1,439	238,561	Water hos.sta	-	Portable CO <sub>2</sub>	Ionization	
	9	SK1	18	RW-1	250	25~H	Radvaste Bldg	MSR	14,400	Cable insulation	6,260		75.1x10 <sup>8</sup>	6,189	233,811	Water hos.sta		Portable CO <sub>2</sub>	None	8,
									60	Resin	500	232,783	14.0x10 <sup>6</sup>							
	0	SK2	18	RW-1	272	25C	Radwaste Bldg	NSR	9,910	Cable	9,152	11,082	110x10 <sup>8</sup>	24,273	215,727	Wet pipe	Fusib.e link	Water hose station	Sprinkler elarm	9
							Baler Area, Laundry Area			Papers,	200	16,000	1.6x10 <sup>6</sup>					station		
									1,580	rags, etc. Clothes Resin Rubber	10,525 500 1,600	11,174 19,595	84.2x10 <sup>6</sup> 14.0x10 <sup>6</sup> 31.0x10 <sup>6</sup>							8,
	.1	SKI	18	SH-13 (SH-1			Circ. Water Pumps Pit	NSR		Cable insulation			39.4x10 <sup>6</sup>		170,987	Water hose station		Portable CO <sub>2</sub>	None	
	-2	SK1	18	SH-1: (SH-		27-5	Screenwell House	NSR		Lube oil Cable insulation	3,150		46.9x10 <sup>6</sup>		237,450	Water hose station		Portable CO <sub>2</sub>	Kode	