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Radford J. Converse
Resident Manager

July 31, 1991
JAFP-91-0454

United States Nuclear Regulatory Commission
Document Control Desk
Mail Station P1-137
Washington, D.C. 20555

Subject: JAMES A. FITZPATRICK NUCLEAR POWER PLANT
DOCKET NO. 50-333
APPENDIX R TO 10 CFR 50 EXEMPTION REQUEST FOR AREA
WIDE SUPPRESSION IN THE BATTERY ROOM CORRIDOR

Dear Sirs:

In accordance with the provisions of 10 CFR 50.12, the New York Power Authority requests exemption from the requirements of Sections III.G.3 of Appendix R to 10 CFR 50 as they apply to the James A. FitzPatrick Nuclear Power Plant. The exemption request concerns fire suppression in the Battery Room Corridor.

Battery Room Corridor (Fire Zone BR-5)

Section III.G.3.b of Appendix R to 10 CFR 50 requires "fire detection and a fixed fire suppression system ... in the area, room, or zone under consideration" where electrical circuits "associated" with alternative or dedicated shutdown could prevent operation of equipment required for hot shutdown.

The Authority has recently determined that the FitzPatrick Battery Room Corridor contains redundant cables required for safe shutdown. Section III.G.3 requires that alternate shutdown capability be provided in this case. Modifications installed to assure alternate shutdown capability for the B train battery room (fire zone BR-4) also ensure alternate shutdown capability in the event of a fire in the battery room corridor (fire zone BR-5). However, a fixed fire suppression system is not installed "in the area, room or zone under consideration".

As an interim compensatory measure, the Authority will post a continuous fire watch in the area. Individuals standing fire watch will be trained how to use a portable fire extinguisher.

The Authority requests exemption from the requirements of Section III.G.3 of Appendix R to 10 CFR 50 to the extent that a fixed fire suppression system is required within the FitzPatrick Battery Room Corridor.

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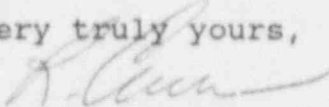
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A detailed description, engineering assessment and technical justification for this exemption request is included in Attachment I.

If you have any questions, regarding either of these exemption requests, contact Mr. J. A. Gray, Jr.

Very truly yours,


RADFORD J. CONVERSE
RESIDENT MANAGER

RJC:JE:mac

Attachment

cc: U.S. Nuclear Regulatory Commission
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