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Dockets Nos. 50-321 and 50-366

LICENSEE: Georgia Power Company

FACILITY: Hatch Units 1 and 2

SUBJECT: SUMMARY OF AUGUST 8, 1984 MEETING WITH GEORGIA POWER COMPANY (GPC)

CONCERNING APPENDIX R SCHEDULAR AND TECHNICAL EXEMPTIONS

Members of the NRC staff attended the subject meeting in Bethesda, Maryland with representatives of GPC. The staff responded to GPC questions concerning the approach GPC is considering for interim measures associated with a schedular exemption request for implementation of the Appendix R modifications at Hatch Units 1 and 2. It also responded to GPC questions concerning possible technical exemptions related to the fire protection in the intake structure and related to the materials considered for fire barriers.

A copy of the slides used by GPC in its discussion are attached as Enclosure 1. A meeting attendance list is attached as Enclosure 2.

(5)

George W. Rivenbark, Project Manager Operating Reactors Branch No. 4 Division of Licensing

Enclosures: 1. Slides

2. Attendance list

cc w/enclosures: See next page

ORB#4:DL W GRivenbark;ef 08/2784

# MEETING SUMMARY DISTRIBUTION

Licensee: Georgia Power Company

\*Copies also sent to those people on service (cc) list for subject plant(s).

Docket File
NRC PDR
L PDR
ORB#4 Rdg
Project Manager - George Rivenbark
JStolz
BGrimes (Emerg. Preparedness only)
OELD
NSIC
EJordan, IE
JNGrace, IE
ACRS-10

# NRC Meeting Participants:

Nick Fiorvante Dennis Kubicki Tom Wambach

# INTAKE STRUCTURE EXEMPTION

- A. Purpose of installation was to reduce the fire load and intermediate combustible availability in the intake structure.
- B. At the time of work, Kaowool was in wide use in the plant.
- C. Kaowool was fire tested in 1979 with circuit integrity maintained for 90 minutes.
- E. Other Kaowool test reports indicate a fire rating of 50 minutes is appropriate.
- F. The Hatch Appendix R submittal committed to a "1-hour fire rated barrier."

QUESTION: With this quality material, do we need an exemption?

### FIRE BARRIERS IN PLANT

- A. Hemyc material tentatively selected.
- B. The testing proved that the cable's functional performance was not impaired, i.e. the cables were "free of fire damage" as required by Appendix R.
- C. The NRC criterion of 325°F on the inside of the barrier was not met for all the Hemyc tests.
- D. Design work is underway for wraps. The actual final configuration will not be known for several months.
- E. Rockbestos high temperature cable may be used for rerouting cable to avoid installation of fire barrier material. As no barrier is needed the 325°F acceptance criterion should be waived.
- QUESTION: (1) If we use a material that has passed a fire test and if we document the basis for our approval of the use of that material do we still need an exemption?
  - (2) Are we required to formally request exemptions from NRC staff guidance?

### DEFINITION OF "OUTAGE-RELATED" WORK

A. Work requires disabling safety system.

Example: cable reroute

B. Work area is high-radiation area during power operation.

Example: torus below main steam lines

C. Work sequence requires that work follow an outage-related job.

Example: installation of fire barriers after cable rerouting is completed

D. Work could impact a safety system indirectly.

Example: pipe support welding over safety-related switchgear

E. Work is to be performed by a contractor who must work during an outage and who needs to complete onsite work in a smooth sequence.

Example: Certain sprinklers are outagerelated, the vendor will work on all sprinklers as a package.

F. The installation of barriers around cable trays and conduit is best delayed until all work over the trays is completed.

Example: barriers installed below sprinkler system

# COMPENSATORY MEASURES - SCHEDULE EXEMPTION

- A. Temporary Barriers may consist of existing partial barriers or Kaowocl installed per our APCSB 9.5-1, Appendix A review and SER.
- B. Interim Suppression Systems ma consist of existing partial suppression coverage installed per our APCSB 9.5-1, Appendix A review and SER

#### ADDITIONAL COMPENSATORY FACTORS

- A. Plant Hatch started the Appendix R review process with an approved SER under APCSB 9.5-1, Appendix A.
- B. A great number of other safety improvement modifications are underway at Hatch. The addition of people to the work force strains the resources of security and Health Physics. It is therefore reasonable to place the resources where the maximum safety gain may be realized.
- C. The installation of temporary systems is often not feasible due to seismic criteria.
- D. Existing plant conditions may provide significant protection, but not meet Appendix R (such as a 2-h fire wall). The existing protection is adequate for the period of time from the Appendix R installation date to the schedule date.
- E. Modifications may require only 2-3 month delay (due to equipment delivery). Compensatory measures would not provide a significant safety gain over so short a period.

### LIST OF ATTENDEES

# MEETING ON HATCH FIRE PROTECTION

# HELD ON AUGUST 8, 1984

Name

J. McLeod

J. C. Hart

J. A. Edwards

D. E. McAfee

R. F. Miller

W. E. Burns

Nick Fioravante

George Rivenbark

D. Kubicki

Tom Wambach

Organization

SCS

GPC "App. R" Project Coord. Eng.

GPC Sr. Reg. Specialist

GPC Sr. Fire Prot. Eng.

SCS

Sr. Eng.

GPC Nuc. Eng. & Evaluation ilgr.

NRC/ASB

NRC/ORB#4

NRC/CMEB

NRC/ORB#5