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January 21, 1985 RBG-19,929 File No. G9.5

Mr. Harold R. Denton, Director Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Dear Mr. Denton:

River Bend Station - Unit 1 Docket No. 50-458

Enclosed is a revision to the Gulf States Utilities Company (GSU), River Bend Station (RBS) Position on fuel storage areas. Although GSU intends to have a fully operational fire protection program for the fuel building at the time of fuel receipt, the unique construction and startup schedule at RBS requires some flexibility. As described in the attachment, should portions of the fire protection equipment remain incomplete for the fuel storage zone (and/or any adjacent zones,) a fire patrol would be provided to monitor activities and promptly respond to events if necessary. As the fire patrol is in communications with the main control room, an equivalent level of safety exists for any area where incomplete fire protection equipment is contained.

This revision to FSAR Section 9A.3.2.6 is consistent with the Special Nuclear Materials License Application previously submitted to the office of Nuclear Material Safety and Safeguards and will be included in the next amendment.

Singerely,

J. E. Booker

Manager - Engineering Nuclear Fuels & Licensing River Bend Nuclear Group

JEB MJR/JWL/je

Attachment (2 pages)

8002

RBS FSAR

Fire protection systems retain their original design capability for potential man-created, site-related events and natural phenomena (except earthquake) which are characteristic (once in 10 yr) of the site geographic region. Natural phenomena are described in Section 2.3.

A building lightning protection system with grounding is provided to permit the dissipation of a direct stroke of lightning without stroke current passing through the nonconducting parts of the building, thus preventing damage caused by the heat and mechanical forces generated in such nonconductive parts by the discharge.

9A.3.2.5 Fire Suppression Systems

Failure or inadvertent operation of the fire suppression system should not incapacitate safety-related systems or components. Fire suppression systems that are pressurized during normal plant operation should meet the guidelines specified in APCSE Branch Technical Position 3-1, "Protection Against Postulated Fiping Failures in Fluid Systems Outside Containment."

RIVER BEND STATION POSITION

Fire protection systems are classified as nonnuclear safety class. Where safety-related components are located, the hangers and supports for the fire suppression lines in the vicinity of this equipment are seismically designed. The plant design includes features such as physical separation of safety-related systems and components, and curbs and drains that prevent the failure or inadvertent operation of the fire suppression systems from incapacitating both redundant systems or components. Water level design is described in Section 3.4.

9A.3.2.6 Fuel Storage Areas

The fire protection program (plans, personnel, and equipment) for buildings storing new reactor fuel and for adjacent fire zones which could affect the fuel storage zone should be fully operational before fuel is received at the site.

RIVER BEND STATION POSITION

A fire protection program (plans, personnel, equipment) will be fully operational for the fuel building and adjacent fire zones prior to receiving fuel at the River Bend Station site.

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A fire protection program (plans, personnel, equipment) will be fully operational for the fuel storage zone and for adjacent fire zones which could affect the fuel storage zone prior to storing fuel in that zone. In the event that portions of the fire protection equipment are incomplete, a fire patrol will be provided for the fuel storage zone and adjacent fire zones that could effect the fuel storage zone. This fire patrol will have communications with the control room.