



THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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MURRAY R. EDELMAN

VICE PRESIDENT
NUCLEAR

February 11, 1985

PY-CEI/NRR-0182 L

Mr. B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Perry Nuclear Power Plant, Unit 1 & 2
Docket Nos. 50-440; 50-441
Portable Fire Extinguisher
Technical Specification

Dear Mr. Youngblood:

This letter provides information to address the SER requirement, section 9.5.1.5.5 (p. 9-45, attached), for a Technical Specification for portable fire extinguishers.

Presently, all portable fire extinguishers at the Perry Plant have been assigned a unique number and have been listed by location. All portable fire extinguishers will be tested periodically in accordance with the Portable Fire Extinguisher Monthly Inspection periodic test (PTI-P540006). In addition, all portable extinguishers will be inspected yearly according to the Portable Fire Extinguisher Annual Maintenance Inspection periodic test (PTI-OP540007). The requirement for a Technical Specification related to portable fire extinguishers does not presently exist in the Standard Technical Specifications. We feel that the Perry administrative controls will assure the availability of portable fire extinguishers.

We believe that this information is responsive to staff concerns and request the SER be changed to delete the requirement for a Technical Specification on portable fire extinguishers.

Very truly yours,

Murray R. Edelman
Vice President
Nuclear Group

MRE:njc

Attachment

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cc: Jay Silberg, Esq.
John Stefano (2)
J. Grobe
S. Brown

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- (6) Units 1 and 2 control room subfloors at elevation 654 ft -0 in. of the control complex. Each control room subfloor is isolated into three main subsections, each protected by its own carbon dioxide system,
- (7) local application carbon dioxide systems: one for each of the four reactor recirculation pump motors (i.e., two each in Units 1 and 2 reactor buildings).

The diesel generator room, turbine-lube-oil tank rooms and turbine-lube-oil purifier rooms present a surface-burning fire hazard and are protected by a minimum carbon dioxide concentration of 34% by volume in accordance with NFPA 12. The computer rooms subfloors and the chart storage room systems are designed in accordance with NFPA 12 for the requirements of deep-seated fire hazards. The design concentration for the computer room subfloors is 50% by volume and for the chart storage room 65% by volume. The design concentration for the modular control room subfloor system is 50% by volume. The minimum design rate of application is based on achieving the design concentration for surface-burning fire hazards within 1 minute, and for deep-seated fires within 7 minutes with a 30% concentration within 2 minutes.

Each carbon dioxide system is provided with a selector valve including a pilot solenoid valve assembly and trim piping for control of carbon dioxide to the distribution piping and nozzles. Local-application carbon dioxide extinguishing systems are provided for the reactor recirculation-pump motors. The entire recirculation-pump motors, associated bearing oil system, and supports are considered the hazard for the subject design. The total discharge rate is based on the volume of an assumed enclosure entirely surrounding the hazard. Assumed wall and ceiling locations are 2 ft from the hazard. No deduction is made for the volumes occupied by equipment. The system design rate is 1 lb/minute/ft³ of assumed volume, with a minimum discharge time of 30 seconds in accordance with NFPA 12. Each system has a selector valve and each valve is provided with a control unit. The system is automatic in operation, except for the motor-operated isolation valves which will be opened from the control room. The staff has reviewed the design criteria and bases for the carbon dioxide fire-suppression systems and concludes that these systems are in accordance with the applicable portions of NFPA 12.

Based on its review, the staff concludes that the carbon dioxide extinguishing systems meet the guidelines of BTP CMEB 9.5-1, Section C.6.e, and are, therefore, acceptable.

9.5.1.5.5 Portable Extinguishers

Portable fire extinguishers have been provided in all areas of the plant in accordance with the guidelines of NFPA 10, except inside containment. The applicant has committed to provide a complement of fire extinguishers, in accordance with NFPA 10, in permanent cabinets at the entrances to containment. These extinguishers can be carried into containment during an emergency fire situation. A supply of extinguishers will be kept inside containment during maintenance operations. A Technical Specification will be established substantiating this commitment.