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February 11, 1985

Office of Nuclear Reactor Regulation
 Attn: John F. Stolz, Chief
 Operating Reactors Branch No. 4
 U.S. Nuclear Regulatory Commission
 Washington, D.C. 20555

Dear Mr. Stolz:

Three Mile Island Nuclear Station, Unit 1 (TMI-1)
 Operating License No. DPR-50
 Docket No. 50-289
 Appendix R Fire Protection-Sample Exemption Request

GPUN has prepared the enclosed sample exemption request for utilizing Rockbestos fire proof cable in lieu of the 10CFR50 Appendix R fire barrier protection requirements. During the August 14, 1984 meeting, the NRC staff requested that a sample exemption request for the use of Rockbestos cable be submitted for a representative fire zone at the TMI-1 station which would address the NRC staff concerns expressed during the discussion. GPUN understands the staff will review the representative exemption request to determine the acceptability of this alternate approach in providing the required level of protection; therefore, the enclosed request reflects the actual existing configuration and planned modifications for Fire Zone FH-FZ-1. Please note, however, the proposed plans for this fire zone were developed based on specific circumstances in this zone and some changes may occur due to other considerations that may develop as the overall plant design details are finalized.

In developing the design details for fire zone FH-FZ-1 it was determined that protecting the "A" train components, as previously described in the "TMI-1 Fire Hazards Analysis and Appendix R Section III. G Safe Shutdown Evaluation," would be impracticable due to complications resulting from the effects of other required modifications at the station. It was found that protecting the "B" train components would eliminate the complications associated with the "A" train. This change does not effect the ability to safely shutdown and cooldown in the event of a fire in this zone since the objective to protect one train of equipment necessary to achieve and maintain safe shutdown is maintained. This change is incorporated in the representative exemption request which lists those circuits associated with the "B" train rather than the "A" train.

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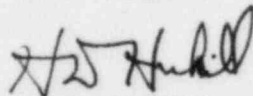
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GPUN believes the use of Rockbestos fire resistant cable provides equivalent protection to that specified in Appendix R while minimizing the impact on existing plant configuration. GPUN is currently proceeding with the Appendix R modification work in order to meet the required schedule; however, as a substantial amount of the detailed design depends on the acceptability of the Rockbestos fire resistant cable approach, an expeditious review and determination is requested in order to support the design and implementation work schedule.

Sincerely,


H. D. Hukill
Director - TMI-1

HDH/GB/spb

cc: J. Van Vliet
T. Wambach

Attachment

Enclosure 1 - Basis for Exemption

Introduction

General Public Utilities Nuclear Corporation (GPUNC) and the Rockbestos Company have cooperated in the development of a fire resistant cable to be utilized in lieu of one hour fire barriers in meeting the requirements of 10CFR50 Appendix R Section III.G. GPUN has coordinated the development and testing of this cable with the NRC staff in order to obtain regulatory input early in the development process.

The Nuclear Fire Proof Cable Development and Test Program was provided to the staff for review and comment in November of 1983. Subsequent testing in February of 1984 included consideration of the NRC staff comments on the testing program. In correspondence dated March 15, 1984, the NRC documented their comments on the test program and provided guidance for requesting exemptions from the regulations with regard to using this cable since the cable did not fully satisfy all NRC concerns regarding Appendix R. However, it was recognized that use of these cables in conjunction with other fire protection features may be equivalent to the protection afforded by the requirements of Section III.G of Appendix R based on acceptable test results.

In June, 1984, GPUN provided the test report to the NRC staff which demonstrated the cable remained functional throughout the 94 hour test period. This correspondence included consideration of all previous comments made by the NRC staff. On July 2, 1984 representatives of GPUN and the NRC

staff met to discuss the test results. As a result of this meeting, GPUN developed examples of exemption requests for the use of the fire resistant cable in representative configurations. The examples were provided to the staff for their review in order to determine acceptability.

On August 14, 1984 representatives of GPUN and the NRC staff met to further discuss the use of fire resistant cables and to clarify the staff concerns with the representative exemption requests. The staff concluded that additional information was required in order to evaluate a request for exemption. Since the information needed was dependent on specific characteristics of the area in which exemptions are desired, GPUN was requested to provide a sample exemption for one specific area of the TMI-1 station based on the actual configuration and planned modifications. The following sections of this report provide a discussion of the specific exemptions requested, the basis for these exemptions, and the proposed modifications to be implemented in Fire Zone FH-FZ-1. The format of these sections is consistent with that in the TMI-1, "Fire Hazards Analysis and Appendix R Section III.G Safe Shutdown Analysis." The attached drawing (GAI No. 5130-300-188) illustrates the cable tray configuration, location of fire detectors and sprinkler heads, and the proposed routing of Rockbestos fire resistant cables protecting safe shutdown circuits within fire zone FH-FZ-1.

Fire Hazards Analysis

Section 1.2 - Summary of Required Modifications

1.2.7 Fuel Handling Building

A. Fire Zone FH-FZ-1

Rockbestos High Temperature Fire Resistant Cable

Stainless Steel Sheathed Rockbestos high temperature fire resistant cable will be routed in trays 150, 165, 166, 558, 575, 576, 837, 838, 839, 840, 841, 842, 843, 844, 845, T-52-58 in this fire zone to replace the following hot shutdown circuits: CH-11, CH-14, CH-15, RE-236, LS-7, RE-109, RE-110, RE-71, RE-72, RE-178, RE-182, LT-11, LT-12, LX-61, LX-63, LT-51, ED-308A, ED-308B, ED-5033, ED-5034, RG-105, RG-61, RE-158, LT-21, LT-16, LT-19, RG-202, and RG-203.

Circuits ME-7, RG-46, RG-47, RG-48, ME-11, and ME-10 will be rerouted out of existing trays in this zone into conduit. The conduit, where located in this fire zone, will be protected with a one hour fire barrier enclosure.

Repair procedures for cold shutdown circuits MD-6 and ME-6 will be developed.

An exemption from the Appendix R Section IIIG2c requirement to protect the above hot shutdown circuits in open raceways with a one hour fire barrier is requested.

An exemption from the Appendix R Section III G1a requirement for the stainless steel sheathed Rockbestos high temperature fire resistant cable to be free of fire damage is requested.

An exemption from the Appendix R Section IIIG2a requirement to fireproof supports for open raceways carrying sheathed cable, for raceways in conduits protected by one hour fire barriers and for services in proximity to these raceways is requested.

Section 3.0 - Appendix R Section IIIG Evaluation Non-Compliances and Proposed Modifications (Safe Shutdown Evaluation)

3.7 Fuel Handling Building

3.7.1 Fire Zone FH-FZ-1

- a. Make-up and Purification Pumps MU-P-1A, 1B and 1C power circuits are routed in this zone. One pump is required for hot shutdown. This fire zone is presently provided with a fire detection system, an automatic wet pipe sprinkler system, hose protection and portable extinguishers. Additional hose protection and portable extinguishers are available in adjacent zones as detailed in Section 4.7.1.

Power Circuit ME-7 will be rerouted out of existing trays in this fire zone into conduit. The conduits where located in this fire zone will be protected with a one hour fire barrier enclosure.

- b. Auxiliary Oil Pumps MU-P3A and 3B and 3C power circuits are routed in this fire zone. One pump is required for hot shutdown. See Section 3.7.1a for existing fire protection features.

Sheathed Rockbestos high temperature fire resistant cable will be routed in tray 558 in this fire zone to replace existing power circuit CH-11 in order to preserve power for MU-P-3C, the Main Lube Oil Pump for MU-P-1C. Replacement cable will consist of a Rockbestos 3 conductor, no. 10-AWG-(1-3-10).

- c. Reactor Building Emergency Cooling Units AH-E-1A, 1B and 1C power circuits are routed in this fire zone. One fan is required for hot shutdown. See Section 3.7.1a for existing fire protection features.

Sheathed Rockbestos high temperature fire resistant cable will be routed in tray 558 in this fire zone to replace existing power circuits CH-14 and CH-15 in order to preserve power for AH-E-1B Reactor Building Emergency Cooling unit. Replacement cable will consist of two Rockbestos 1-3-4/0 cables for replacement of each circuit.

- d. Decay Heat Pumps DH-P-1A and 1B power circuits are routed in this fire zone. One pump is required for cold shutdown. See Section 3.7.1a for existing fire protection features.

Repair capability will be established to effect repairs to either power circuits MD-6 or ME-6 to restore power to either pump within 72 hours if a fire causes a power loss to these pumps in order to achieve and maintain a stable cold shutdown condition. Repair procedures will be developed and necessary tools, equipment and replacement parts will be controlled in order to effect such repairs.

- e. Borated water storage tank monitoring DH3-LT 1 and 2 instrument circuits are routed in the same tray in this fire zone. One instrument is required for hot shutdown. See Section 3.7.1a for existing fire protection features.

The cable for circuit RE-236 has been rerouted outside of this fire zone in order to preserve power for DH-3-LTI Borated Water Storage Tank monitoring circuit. This modification eliminates the noncompliance associated with this circuit.

- f. Feeders to 480V AC-ESV CC-1A and 1B (EG-CCESV-1A and 1B) are routed in this fire zone. One MCC feeder circuit is required for hot shutdown feeder circuit. See Section 3.7.1a for existing fire protection features.

Sheathed Rockbestos high temperature fire resistant cable will be routed in trays 576, 575 and 558 in this fire zone to replace existing circuit LS-7 in order to preserve power for 480V AC-ESV-CC-1B (EG-CCESV-1B). Replacement cable will consist of three Rockbestos 1-3-4/0 cables.

- g. Nuclear Instrumentation NI-1 and 2(Q) circuits are routed in this fire zone. One instrument is required for hot shutdown. See Section 3.7.1a for existing fire protection features. NI circuits RG-46, RG-47 and RG-48 will be rerouted out of existing trays in this fire zone into conduit. The conduit, where located in this fire zone, will be protected with a one hour fire barrier enclosure.

- h. Steam Generator Pressure Monitoring SP-6A-PT1 and SP-6A-PT2 instrument circuits are routed in this fire zone. One instrument is required for hot shutdown. See Section 3.7.1a for existing fire protection features.

Sheathed Rockbestos high temperature fire resistant cable will be routed in tray 842 and 843 in this fire zone to replace existing circuit RE-109 in order to preserve SP-6A-PT1 Steam Generator Pressure Monitoring instrumentation circuit.

Replacement of cable will consist of Rockbestos 1-2-14 cable.

- i. Steam Generator Pressure Monitoring SP-6B-PT1 and SP-6B-PT2 instrument circuits are routed in this fire zone. One instrument is required for hot shutdown. See Section 3.7.1a for existing fire protection features.

Sheathed Rockbestos high temperature fire resistant cable will be routed in tray 840 and 841 in this fire zone to replace existing circuit RE-110 in order to preserve SP-6B-PT1 Steam Generator Pressure Monitoring instrumentation circuit.

Replacement of cable will consist of Rockbestos 1-2-14 cable.

- j. Steam Generator Level Monitoring SP-1A-LT1 and SP-1B-LT1 instrument circuits are routed in this fire zone. Both instruments are required for hot shutdown.

Sheathed Rockbestos high temperature fire resistant cable will be routed in trays 837, 838, 839, 844, and 845 in this fire zone to replace existing circuits RE-71 and RE-72 in order to preserve SP-1A-LT1 and SP-1B-LT1 Steam Generator Level Monitoring instrumentation circuits.

Replacement of each cable will consist of Rockbestos 1-4-14 cable.

- k. Reactor Coolant Temperature (Cold) Monitoring RC-5A-TE2, TE4 and RC-5B-TE2, TE4 instrument circuits are routed in this fire zone. One instrument per reactor coolant leg is required for hot shutdown.

Sheathed Rockbestos high temperature fire resistant cable will be routed in trays 840, 841, 842, and 843 in this fire zone to replace existing circuits RE-178 and RE-182 in order to preserve RC-5A-TE2 and RC-5B-TE2 Reactor Coolant Temperature (Cold) Monitoring instrumentation circuits. Replacement of each cable will consist of Rockbestos 1-2-14 cables for replacement of each circuit.

1. Power, control, and control power circuits to the 480V AC ES-SH SWGR-1R and 1T (EE-SGESSH-1R and 1T) are routed in this fire zone. Power, control and control power circuits for one switchgear are required for hot shutdown. See Section 3.7 1a for existing fire protection feature.

Power circuit ME-11 will be routed out of existing tray in this fire zone into conduit. The conduit where located in this fire zone will be protected with a one hour fire barrier enclosure. Sheathed Rockbestos high temperature fire resistant cable will be routed in trays 165, 166 and 150 in this fire zone to replace existing circuits LT-11, LT-12, LX-61, LX-63 and LT-51 in this fire zone in order to preserve 480V AC-ES-SH SWGR IT (EE-SGESSH-1T) control circuits. Replacement of cable will consist of the following:

2 Rockbestos (1-4-8 and 1-2-12) cables for LT-11

2 Rockbestos 1-4-8 cables for LT-12

2 Rockbestos 1-3-12 cables for LX-61

2 Rockbestos 1-2-12 cables for LX-63

2 Rockbestos (1-4-8 and 1-2-12) cables for LT-51

Sheathed Rockbestos high temperature fire resistant cable will be routed in trays T-52-58 and 558 in this fire zone to replace existing circuits ED 308A, ED 308B, ED 5033 and ED 5034 in this fire zone to preserve 480V AC-ES-SH SWGR IT (EE-SGESSH-1T) control power circuits. Replacement of cable will consist of a single Rockbestos 1-3-2 cable for each circuit replaced.

- m. Reactor Coolant Temperature (Hot) Monitoring RC-4A-TE2, TE3 and RC-4B-TE2, TE3 instrument circuits are routed in this fire zone. One instrument per reactor coolant leg is required for hot shutdown. See Section 3.7.1a for existing fire protection features.

Sheathed Rockbestos high temperature fire resistant cable will be routed in trays 840, 841, 842 and 843 in this fire zone to replace existing circuits RG-105 and RG-61 in order to preserve RC-4A-TE3 and RC-4B-TE2 Reactor Coolant Temperature (Hot) Monitoring instrumentation circuits. Replacement of cable will consist of two Rockbestos 1-2-14 cables for replacement of each circuit.

- n. Reactor Coolant Pressurizer Level Monitoring RC-1-LT1, LT2 and RC-1-LT3 instrument circuits are routed in this fire zone. One instrument is required for hot shutdown. See Section 3.7.1a for existing fire protection features.

Sheathed Rockbestos high temperature fire resistant cable will be routed in tray 840 and 841 in this fire zone to replace existing circuit RE-158 in order to preserve RC-1-LT3 Reactor Coolant Pressurizer Level Monitoring instrumentation circuit.

Replacement of cable will consist of Rockbestos 1-4-14 cable.

- o. Decay Heat River Water Pumps DR-P-1A and 1B control circuits are routed in this fire zone. One pump is required for hot shutdown. See Section 3.7.1a for existing fire protection features.

Sheathed Rockbestos high temperature fire resistant cable will be routed in trays 165, 166 and 150 in this fire zone to replace existing control circuit LT-21 in order to preserve control of Decay Heat Water Pump DR-P-1B. Replacement of cable will consist of two Rockbestos cables (1-4-8 and 1-3-12).

- p. Nuclear Services River Water Pumps NR-P-1A, 1B and 1C control circuits are routed in this fire zone. One pump is required for hot shutdown. See Section 3.7.1a for existing fire protection features.

Sheathed Rockbestos high temperature fire resistant cable will be routed in trays 150, 166 and 165 in this fire zone to replace existing control circuits LT-16 and LT-19 in order to preserve control of Nuclear Services River Water Pump NR-P-1C.

Replacement of cable will consist of three Rockbestos cables (1-4-8, 1-3-8 and 1-5-12) for LT 16 and two Rockbestos cables (1-3-8) for LT-19.

- q. Reactor Building Emergency River Water Pumps RR-P-1A and 1B power circuits are routed in this fire zone. One pump is required for hot shutdown. See Section 3.7.1a for existing fire protection features.

Power circuit ME-10 will be rerouted out of existing trays in this fire zone into conduit. The conduit, where located in this fire zone, will be protected with a one hour fire barrier enclosure.

- r. Reactor Coolant Pressure Level Monitoring RC-3A-PT3, PT4 and RC-3B-PT3 instrument circuits are routed in this fire zone. Two instruments are required for hot shutdown. See Section 3.7.1a for existing fire protection features.

Sheathed Rockbestos high temperature fire resistant cable will be routed in trays 840, 841, 842 and 843 in this fire zone to replace existing instrument circuits RG-202 and RG-203 in order to preserve RC-3A-PT4 and RC-3B-PT3 Reactor Coolant Pressure Level Monitoring instrumentation circuits. Replacement of cable will consist of a Rockbestos 1-2-14 cable for each circuit.

3.7.1.1 Justification for Proposed Final Configuration

1. Rockbestos Fire Resistant Cable

Rockbestos fire resistant cable has been shown to retain its ability to function when subjected to a fire exposure test utilizing the time temperature curve outlined in the ASTM

E-119 standard for "Fire Tests of Building Construction and Materials." The test method employed was an adaptation of the test method outlined in the ASTM E-119 test in order to correlate the cable fire test with those which have been performed on cable raceway fire barrier envelope systems. Underwriters Laboratories, Inc., Report File R10925-1, "Report on Fire Resistant Cables" dated April 10, 1984 provides a description of the tests conducted and the results obtained.

The test configuration was representative of the cable configurations existing at the TMI-1 station and included several hose steam tests over a 93 hour period. During the first hour of the test, other cables within the cable tray were ignited which resulted in direct flame impingement on the Rockbestos cable and required repeated applications of hose steams to extinguish the fire upon removal from the test oven. Throughout the duration of the test the Rockbestos cable retained its ability to function; therefore, exposure to water suppression in post fire conditions will not create shorts or post fire mechanical forces that could affect the operability of hot shutdown equipment.

2. Zone Characteristics and Fire Protection Features

The in-situ fire loading within this zone consists primarily of cable insulation, which is slow burning in nature. Eight steel drums, each 55 gal., are located in the southwest

section of the zone, near the elevator, for the collection of waste materials such as paper, plastic, clothing, etc. Maintenance materials such as rubber and plastic hose, vacuum cleaners, plastic buckets, etc. are kept behind a partial height wall in the south section of the zone. Cable routings above these transient combustibles are such that only one redundant channel of cable trays (B channel) are located above or in the immediate vicinity of the steel drums containing waste in the southwest section and only one redundant channel of cable trays (A channel) are located above or in the immediate vicinity of the maintenance materials in the south section. Combustibles in other areas of this fire zone consist of cable insulation in trays and small quantities of pump lubricating oil. The overall fire loading, the majority of which is cable insulation in trays, is $38,954 \text{ BTU/ft}^2$ which corresponds to a fire severity on the ASTM E-119 time-temperature curve of 29 minutes.

The fire loading in the zone is considered low with no significant concentration of combustibles. The major combustible, cable insulation, is contained in open bottom trays which are spread horizontally up to eight trays wide instead of being stacked vertically. At several locations the north-south routed trays pass over or under east-west routed trays. The maximum vertical stacking of trays occurs

in the northwest section of the zone where three large and two small cable trays are stacked for a short distance. In all locations within this zone, the cable tray arrangement is not considered to be heavily concentrated, congested, or inaccessible for manual fire fighting. All cable trays are located in the upper portions of the rooms and corridors and are readily accessible for manual fire suppression.

This fire zone is protected by an area wide fire detection system and an area wide automatic sprinkler system providing full coverage of the two locations containing transient combustibles as well as all cable trays. The automatic suppression system will provide early fire extinguishment or control in all areas preventing excessive heat generation. The fire detection system assures rapid response by the plant fire brigade. A hose station and portable fire extinguishers are provided in the zone for manual fire extinguishment.

3. Repairs

Post-fire repairs to either power circuit MD-6 or ME-6 will be effected for this fire zone to restore power to either Decay Heat Pump DH-P-1A or 1B within 72 hours in order to achieve and maintain stable cold shutdown conditions. A procedure to effect such repairs will encompass the following:

Damage Assessment - A physical evaluation of the fire damaged area will be made. This evaluation is aimed at determining the physical boundaries of the fire damage.

Physical damage to the aforementioned circuits will be noted. A system operational check can be accomplished in parallel with the physical damage review. If the system is found to be functional, no repairs will be necessary. The objective of the damage assessment is to minimize required repairs which must be accomplished.

System Repair - The repair section will provide the step-by-step activities needed to repair circuits in this fire zone within 72 hours. A description of the circuits and any time restraints on system operability will be included. Manpower and repair and/or tool, equipment and replacement material requirements will be identified as well as the tool, equipment and materials on-site storage location.

4. Conclusions

The Rockbestos fire resistant cable has been tested in configurations representative of those in which the cable will be installed within this fire zone. The testing performed demonstrates the ability of the cable to function during and after exposure to a fire condition including direct flame impingement on the cable. Additionally, the testing included exposure to water hose streams demonstrating that the cable's function will not be adversely affected by water application or mechanical stresses associated with fire suppression activities. Since post fire recovery operations

will preclude aggravating hot shutdown circuits until the plant is in a cold shutdown condition, the cable will not be subjected to mechanical stresses due to handling operations. In conjunction with fixed suppression and detection, sheathed Rockbestos cable provides a practical alternative and an equivalent level of protection for hot shutdown circuits as that provided with the installation of one hour fire barriers as required by 10CFR50 Appendix R Section III G.2C.

The fixed automatic suppression system and the fire detection system assure that fires in this zone will be extinguished during the early stages of development. Due to the low amount of transient combustibles and the slow burning nature of the cable insulation, the major combustible, sufficient time exists for manual suppression by the plant fire brigade. The fire detection system assures prompt response by the plant fire brigade and rapid manual extinguishment with the manual suppression equipment provided in the zone. This assures that temperatures within the zone will not rise to levels where the structural integrity of steel supports will be affected even if the automatic suppression system should fail to function as designed. Therefore, supports for open raceways carrying the Rockbestos fire resistant cable, conduits protected by one hour fire barriers, supports for services in proximity to these raceways and conduits need not be fireproofed in this zone.

Since temperature buildup in this zone is precluded by early fire suppression, thermal expansion of raceways, conduits, and cables is considered negligible and would not affect system function.

Fire barriers and Rockbestos cable runs will be continuous throughout the fire zone (i.e., splices will be made outside the zone boundaries, barriers will extend from boundary to boundary with no breaks in protection within the zone).

Cable routings, both in tray and conduit, are located in the upper portion of the zone just below ceiling level which minimizes the potential for falling debris due to a fire.

The equipment located above the cable routings consists of other cable trays, conduit and fire protection systems.

Since detection and automatic suppression is provided in the zone, temperatures in the zone will not rise to levels where structural integrity of steel supports would be affected.

The construction of the Rockbestos cable (sheathed) assures that light debris from the burning of cable insulation will not adversely effect the operability of the rockbestos cable.

The replacement of hot shutdown circuits in open raceways with sheathed Rockbestos fire proof cable and the rerouting of hot shutdown circuits into conduit protected by one hour fire barrier enclosures in conjunction with existing fire protection features in this fire zone provides a level of protection equivalent to that required by Appendix R and will

assure the capability to achieve hot shutdown in the event of a fire. The repair procedures proposed for cold shutdown circuits in this zone are consistent with the requirements of Appendix R. Therefore, cold shutdown capability is assured in the event of a fire in this zone.

5. Exemptions

The Rockbestos fire resistant cable test program demonstrates the ability of this cable to remain functional when exposed to a one hour fire based on the ASTM E-119 standard; however, since the cable does experience a physical transformation during the fire exposure, exemption is requested from the literal 10CFR50 Appendix R Section III.G.1a requirement "free of fire damage." Although the cable is affected by the fire exposure, its ability to function is maintained; therefore, from an operability standpoint hot shutdown systems are free of fire damage.

Rockbestos fire resistant cable provides an equivalent level of protection for hot shutdown circuits as that provided by one hour fire barriers since the cable remains functional during and after exposure to a fire condition for 72 hours (the cable test period was 94 hours). This assures the operability of those systems necessary for achieving and maintaining hot shutdown of the plant. Once cold shutdown is achieved, the Rockbestos fire resistant cables involved in the fire would be replaced prior to startup in order to

restore fire protection capabilities. Based on the equivalent level of protection provided, exemption from the 10CFR50 Appendix R Section IIIG.2C requirement for enclosure of hot shutdown circuits in one hour fire barriers is requested.

The automatic suppression system in this zone assures rapid extinguishment of fires in their beginning stages; therefore, preventing any appreciable heat generation. Furthermore, the fire loading in the zone is low, the major combustible is difficult to ignite and slow burning, and transient combustibles in the zone are minimized. Prompt response of the plant fire brigade, due to early warning fire detection, assures manual suppression of the fire prior to heat generation of sufficient magnitude to effect the integrity of structural steel supports even though the automatic suppression system were to fail to function as designed. Therefore, exemption from the requirement of 10CFR50 Appendix R Section III.F.2a to fireproof supports for open raceways and conduits associated with safe shutdown equipment and for services in proximity to these raceways is requested.