

Docket No. 50-346

License No. NPF-3

Serial No. 1127

February 14, 1985



RICHARD P. CROUSE
Vice President
Nuclear
(419) 259-5221

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

Dear Mr. Denton:

The Toledo Edison Company submits the following comments on the Report of the Nuclear Regulatory Commission (NRC) Fire Protection Policy Steering Committee (50 Federal Register 2056) (Log 1690).

The Steering Committee report was prepared pursuant to a directive from the Executive Director for Operations for the development of recommendations to resolve certain fire protection issues. Among these were:

1. The general adequacy of current guidance to industry on Appendix R.
2. The validity of certain interpretations of Appendix R.
3. The treatment of future technical and schedular exemptions from Appendix R.
4. A comparison of the requirements applicable to Appendix R plants (pre-1979), and those applicable to post-1979 plants (Near Term Operating Licensees - NTOL's).
5. The adequacy of current inspection practices.

The Toledo Edison Company, Davis-Besse Nuclear Power Station, Unit No. 1, was audited for compliance to its Fire Protection Commitments and Appendix R during the week of July 25-29, 1983. Since that time, Toledo Edison has acted in a proactive manner to satisfactorily resolve all specific and generic deficiencies identified during that inspection, as well as to increase Toledo Edison's and the commercial nuclear industry's awareness of the various Fire Protection and Appendix R concerns through active participation in the Nuclear Utility Fire Protection Group (NUFPG).

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As an active member in NUFPG, Toledo Edison participated in the development of and fully endorses the NUFPG submittal, "Comments on the Report of the NRC Fire Protection Policy Steering Committee", dated February 14, 1985.

Also, the Toledo Edison Company has developed two (2) additional comments for your consideration as follows:

Comment 1: The discussion in response to Question 3.2.1 of the draft Generic Letter 85-01 states as follows (page 14):

"Conduit and cable tray enclosure materials accepted by the NRC as 1 hour barrier prior to Appendix R (e.g. some Kaowool and 3M materials) and already installed by the licensee need not be replaced even though they may not have met the 325°F criteria. However, new material should meet the 325°F criterion. Justification of temperatures which exceed 325°F is required."

It is Toledo Edison's determination that the final quoted sentences should be modified to read, "However, newly identified conduit and cable trays requiring such wrapping should use new material which meets the 325°F criterion or justification should be provided of temperatures exceeding the 325°F criterion."

Utilizing the different wording would prevent situations occurring, such as one conduit undergoing repair being partially wrapped by two differing materials.

Comment 2: The response to Question 5.3.8, concerning Short Circuit Coordination Studies, states:

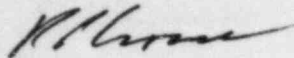
"Clearing such faults on non-essential circuits may be accomplished by manual breaker trips governed by written procedures."

The word non-essential may allow misinterpretation with regard to essential vs non-essential circuits, Class 1E vs. Non-Class 1E circuits, etc. It is Toledo Edison's understanding that all loads not required to achieve and maintain safe shutdown, which may fault and cause high impedance ground fault tripping of the supply breaker may be opened allowing reenergizing of the bus supply power.

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Toledo Edison, therefore, recommends that the words
"non-essential circuits" be removed and replaced by
"associated circuits which may effect safe shutdown".

Very truly yours,



RPC:JSH:SGW:nlf
cc: DB-1 NRC Resident Inspector