

Docket No.: 50-341

MAR 1 1985

Dr. Wayne Jens  
Vice President - Nuclear Operations  
The Detroit Edison Company  
2000 Second Avenue  
Detroit, Michigan 48226

Dear Dr. Jens:

Subject: Fire Protection Deviation Requests for the Fermi-2 Facility

We have received your two letters dated January 23 and February 4, 1985, in which you request approval of some additional deviations for the Fermi-2 fire protection program from our requirements and positions on these matters. We find that you have not submitted sufficient information for us to complete our review of some of your requests. Additionally, we find that we cannot accept the requested deviations for the unlisted fire door assemblies, fire door assembly RB 3-20 and the fire detector installation for the control room complex, the refueling floor and the reactor building basement corner rooms.

Accordingly, we have prepared three regulatory staff positions (RSPs) on these items and a request for additional information. These are in the enclosure to this letter. For us to conclude the resolution of these requests without incurring a licensing delay, we require you to respond to our positions and provide the additional information, no later than March 5, 1985.

If you have any questions on this matter, please contact the Fermi-2 Project Manager, M. D. Lynch, at (301) 492-7050.

Sincerely,  
ORIGINAL SIGNED BY:

B. J. Youngblood, Chief  
Licensing Branch No. 1  
Division of Licensing

Enclosure: As stated

cc: See next page

RETYPE 3/1/85 (kab)

DL:LB#1  
MDLynch:es  
03/01/85

DE:CEB (M)  
VBenaroya  
03/1/85

DL:LB#1  
BJYoungblood  
03/01/85

DIST:

Docket File  
NRC PDR  
Local PDR  
PRC System  
NSIC

LB#1 Rdg  
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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

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Vice President - Nuclear Operations  
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2000 Second Avenue  
Detroit, Michigan 48226

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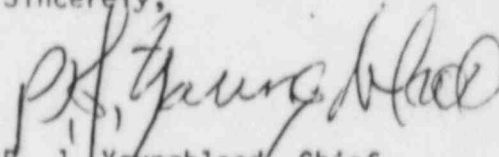
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Sincerely,

  
R. J. Youngblood, Chief  
Licensing Branch No. 1  
Division of Licensing

Enclosure: As stated

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FERMI

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Dr. Wayne Jens  
Vice President - Nuclear Operations  
The Detroit Edison Company  
2000 Second Avenue  
Detroit, Michigan 48226

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Regional Administrator  
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Glen Ellyn, Illinois 60137

Request for Additional Information  
And Statement of Regulatory Staff Positions  
Regarding the Fire Protection Program  
at the Fermi-2 Facility

1. Based on the results of the fire test for Fire Door R3-13, provide the hourly fire rating which this door achieved. If the door did not achieve a 3-hour rating, provide a fire hazards analysis justifying its installation in a 3-hour fire-rated barrier.
2. Provide your program to correct the fire protection yard piping which did not pass the hydrostatic testing performed in accordance with NFPA 24.
3. In our review of the Fermi-2 fire protection program, we understood that approved fire door assemblies with fire resistive ratings commensurate with the fire ratings of the walls, had been provided in openings to areas containing safe shutdown equipment or circuits. In your letters dated January 23 and February 4, 1985, you indicated that some fire door assemblies were not labeled or listed by a nationally recognized testing laboratory. In place of providing labeled or listed fire door assemblies, you retained Underwriters Laboratory (UL) to: (1) review the design of the unlabeled fire door assemblies; and (2) recommend modifications which would bring the design of these unlabeled fire door assemblies in accordance with the requirements for labeled fire door assemblies.

However, UL indicated in Report No. NC 699-2, dated April 24, 1984, that it in no way implied a listing classification for the fire door assemblies which it reviewed. This report did indicate that UL would be agreeable to labeling the fire door assemblies in question following a field inspection and the possible destructive examination of one or more of the unmarked products.

In accordance with our guidelines in Paragraph D.1(j) of Appendix A to Section 9.5.1 of the Standard Review Plan (SRP), we require that you label or list the subject fire door assemblies using UL or some other approved laboratory.

4. Fire Door RB 3-20 was subjected to a fire test in accordance with UL Standard 10B, "Fire Test of Door Assemblies." Our review of the test results indicates that this fire door assembly failed the fire test. In your letter dated February 4, 1985, you request a deviation from our guidelines to the extent that it requires an approved fire door assembly. This request is based on a low in-situ combustible fuel load in the area where the fire door is installed (i.e., the control room stairwell to the relay room).

In Paragraph D.1 of Appendix A to Section 9.5.1 of the SRP, we state that fire door assemblies be approved assemblies, tested, and labeled or listed by an approved testing laboratory. Accordingly, we require that you replace fire door assembly RB 3-20 with an approved fire door assembly.

5. In our review of the Fermi-2 fire protection program, we understood that early warning fire detectors had been installed in accordance with NFPA 72E. However, in your letter dated February 4, 1984, you requested deviations from the requirement to locate early warning fire detectors in accordance with NFPA 72E in the control room complex, the torus area, the refueling floor and the reactor building basement corner rooms. With the exception of the torus area, you provided justification for not locating fire detectors in accordance with NFPA 72E on the basis that each area has a low in-situ fuel load. It is our position that a low fuel load is insufficient justification for not locating fire detectors in accordance with NFPA 72E. Accordingly, we require that you provide early warning fire detectors in the control room complex, the refueling floor and the reactor building basement corner rooms in accordance with NFPA 72E.