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February 18, 1985
EF2-70391

Mr. James G. Keppler
Regional Administrator
Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

Reference: (1) Fermi 2
NRC Docket No. 50-341

Subject: Additional Fire Protection Information

In a recent inspection by your Mr. Charles Ramsey, information was requested with respect to 1) compliance with NFPA 14 insofar as maximum pressure used at hose stations is concerned and 2) compliance with the NFPA codes in general. It was also noted that if there were any deviations from such codes that they should be filed and justified prior to fuel load.

With reference to the first item the FSAR states in Section 9B.5 that NFPA 14 was used for guidance for sizing, spacing, and pipe supports. In addition, NFPA 14 recommends a maximum pressure at a fire hose from a hose station of 100 psi. The General Service Water System, which normally provides water to the Fire Protection System, operates at a normal pressure of 150 psi. It was previously identified in the FSAR Section 9B.5 (p9B.5-30) that we would provide pressure reducers on the fifth floor of the Reactor Building (refueling floor) because of the solid stream nozzles. Justification was provided in the FSAR for exceeding 100 psi based on the use of fog nozzles on other floors plus the fact that the fire brigade members are trained in the use of the higher pressures. Pressure reducers have now been installed on all safety-related fire hose stations located below grade elevation 583' 0". These reducers will maintain pressure at the hose at approximately 130 psi. The FSAR will be updated in an upcoming amendment to reflect this change.

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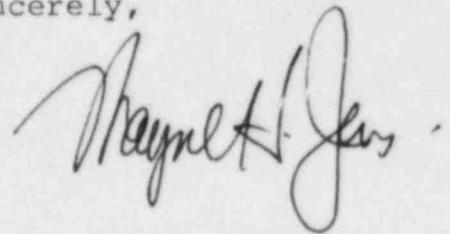
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The reason for desiring a higher pressure at hose stations is to be able to more effectively fight fires at the ceiling height where the cable trays are located, since the distance between the floors is as much as 25 feet. This higher pressure has been recommended by the plant's Nuclear Fire Protection Specialist who has more than 20 years professional experience with the City of Detroit Fire Department. As stated previously, fire brigade training is accomplished at the higher pressures, using fire hoses with 150 psi pressure available. In addition, employees are instructed during the Fermi 2 orientation program that the inside fire hose stations are for fire brigade use only. As a precaution, signs will be installed on hose stations inside safety-related buildings which state, "High Pressure - Fire Brigade Use Only." Because of the special considerations at Fermi 2 as discussed above, Detroit Edison believes the decision to utilize these higher pressures is a prudent one.

With respect to conformance to NFPA codes, Detroit Edison has designed and built its fire protection system and programs for Fermi 2 using the guidance of NFPA codes as stated and qualified in FSAR Section 9B.5. Section 9B.1.2 lists the codes used in summary form for reference purposes. Detroit Edison believes that its fire protection system and program for Fermi 2 are consistent with the referenced NFPA codes with no significant deviations except those previously identified in the FSAR and in specific submittals to the NRC. To provide further assurance in this regard, Detroit Edison will have a specific walkdown conducted by a third party knowledgeable in the NFPA codes to identify any other potential deviations. This walkdown is expected to be accomplished by June 30, 1985. Any deviations identified will either be corrected or specifically justified to NRC in writing.

We believe this information is responsive to your questions. If you need any further information, please contact Mr. Lewis Pregni at (313) 586-5083.

Sincerely,



cc: Mr. P. M. Byron
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