## PHILADELPHIA ELECTRIC COMPANY

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SHIELDS L. DALTROFF VICE PRESIDENT ELECTRIC PRODUCTION

January 7, 1985

Docket Nos. 50-277 50-278

Mr. Darrell G. Eisenhut Division of Licensing U.S. Nuclear Regulatory Commission Washington, D.C. 20555

SUBJECT:	Peach B	ottom	Atomic	Power	Station
	Fire Do	or Sul	rveillan	nce	

REFERENCE:

 Correspondence dated February 16, 1979
S. L. Daltroff, PECo, to T. A. Ippolito, NRC
Supplement No. 1 to Safety Evaluation of Peach Bottom Fire Protection Program dated August 14, 1980, R. W. Reid, NRC, to E. G. Bauer, Jr., PECo

Dear Mr. Eisenhut:

This letter informs you of a change to a commitment made in reference 1 regarding the supervision of fire doors. The change conforms to the surveillance options permitted in 10 CFR 50, Appendix R, Section III.N, for the inspection of fire doors. Additionally, this letter clarifies the scope of safety-related areas requiring fire door protection.

Licensee committed to providing electrical supervision on all fire doors protecting safety-related areas except for twenty-nine doors (reference 1, page 14). This commitment was approved by the NRC in Supplement No. 1 to the Safety Evaluation of Peach Bottom Fire Protection Program (reference 2). Subsequently, Appendix R was issued which permits the option of either providing electrical supervision or inspecting the fire door daily to verify its closed position.

Recent fire protection analyses for Peach Bottom have increased the scope of areas requiring fire door protection. Rather than be restricted to the commitment to install electrical supervision on these doors, we wish to implement, as appropriate, either option identified in Appendix R. Accordingly, in lieu

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of the commitment to position 28(b) in reference 1, we will implement a fire door surveillance program which conforms to the provisions of 10 CFR 50, Appendix R, Section III.N. This change allows a more cost effective means of monitoring the closed position of fire doors.

The second issue involves the scope of safety-related areas requiring fire door protection. The commitment made in reference (1) to position 28(b) stated that "all fire doors protecting safety-related areas are provided with electrical supervision from the control room except for 29 doors listed in Table 1". In order to avoid a possible misinterpretation of this commitment regarding the scope of safety-related areas requiring fire door protection, we wish to substitute the following commitment for the commitment made to position 28(b) in reference (1).

> "Fire doors will be provided in fire barriers which protect redundant divisions of safety-related systems required to ensure safe shutdown capability in the event of a fire. Fire door surveillance will be performed in accordance with the provisions of 10 CFR 50, Appendix R, Section III.N.

Should you have any questions regarding this request, please do not hesitate to contact us.

Very truly yours,

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cc: J. H. Williams, Resident Inspector