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 TELEX 136-482
 Writer's Direct Dial Number:

April 3, 1985

Mr. John Zwolinski, Chief
 Operating Reactor Branch No. 5
 Division of Licensing
 U.S. Nuclear Regulatory Commission
 Washington, DC 20555

Dear Mr. Zwolinski:

Subject: GPU Nuclear Corporation (GPUN)
 Oyster Creek Nuclear Generating Station (OCNGS)
 Docket No. 50-219
 Fire Protection

By letter dated June 30, 1982, GPUN submitted the "Oyster Creek Nuclear Generating Station Appendix R Fire Evaluation Report". This report described the measures GPUN would take to meet the requirements of 10CFR50, Appendix R which included (1) the conceptual design description for an alternative shutdown capability (2) a description of planned modifications to the station and (3) a number of exemption requests where warranted. The NRC staff reviewed this submittal and issued a Safety Evaluation Report (SER) by letter dated November 18, 1982 which approved the conceptual design of the alternative shutdown capability. By letter dated December 16, 1983, GPUN submitted the "Oyster Creek Fire Hazards Analysis Report and Section III.G Safe Shutdown Evaluation" which included the information provided in the June 30, 1982 submittal as well as additional information that was provided in response to an NRC letter granting approval of a schedular exemption dated April 30, 1982. The December 16, 1983 submittal was further supplemented by GPUN letters dated February 13, 1984 and May 3, 1984.

On January 22, 1985, GPUN met with the NRC staff in order to discuss changes to the conceptual design of the alternative shutdown system as a result of further study and analysis in formulating the preliminary design specifications. Although the basic approach to providing the alternative shutdown capability and identifying cable rerouting modifications remains the same, further detailed analyses have shown that a significant amount of work is unnecessary. The purpose of the January 22, 1985 meeting was to

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identify to the staff the change in the scope of the proposed work in order to obtain an estimate of the time required for NRC review and approval of these changes. It was agreed at this meeting that GPUN would submit by March 31, 1985, a revised "Fire Hazards Analysis Report and Section III.G Safe Shutdown Evaluation" and the staff would complete their review of this submittal by June 30, 1985. Enclosure 1 to this letter provides the revised report which includes the change in work scope and the revised exemption requests resulting from the proposed changes. This report supersedes the December 13, 1983 submittal, as supplemented, in its entirety. Additionally, this submittal incorporates Fire Hazards Analysis considerations in the appropriate sections within this report; therefore, the Oyster Creek Fire Hazards Analysis provided as enclosure 2 in the June 30, 1982 letter is superseded since the information in this report includes those changes resulting from plant modifications and additional reviews which have occurred since the 1982 submittal.

In order to facilitate the NRC staff review; Enclosure 2 of this letter provides a comparison table which presents a ready reference for identifying the specific changes between the December 13, 1983, submittal, as supplemented, and the enclosed report. Enclosure 3 provides various drawings illustrating the paths to safe shutdown and preliminary routing drawings for safe shutdown cables. These drawings are colorcoded to further facilitate review. Please note these drawings are provided as a review tool and are not intended to represent "as built" conditions. The drawings reflect cable locations within specific fire zones; however, actual routings within each zone may change due to detailed design considerations.

GPUN requested a schedular exemption from the requirements of 10CFR50.48(c) by letters dated September 16, 1983 and July 11, 1984. The schedular exemption was granted by the NRC staff in their letter dated August 23, 1984. Prior to the staff's approval of the exemption request, GPUN, in response to the staff's request, provided a listing, letter dated May 14, 1984, of those modifications for which schedular exemption was being requested. Please note, the listing provided in the May 14, 1984 letter is no longer accurate due to the reduced scope of work identified in the enclosed report. A summary of the currently proposed modifications is provided in section 1.2 of enclosure 1. Based on the review and approval schedule agreed to during the January 22, 1985 meeting, no further schedular exemptions will be required to accomplish Appendix R implementation.

GPUN believes the information provided will serve to clearly present all proposed changes to the December 13, 1983 submittal, as supplemented. These changes were made only after an in-depth review and detailed quantitative analysis, where applicable, which provides sufficient technical support to assure compliance to 10 CFR 50, Appendix R, Section III.G and III.L. Where exemptions to these regulations are warranted detailed justification has been provided. The enclosed report including the exemptions requested meets the intent of the regulations to provide defense-in-depth protection from the effects of fire. Should you have any

questions or require any further assistance in the review of this information please contact Mr. Michael Laggart of our Licensing & Regulatory Affairs staff at (201) 299-2341.

Very truly yours,



P. B. Fiedler
Director - Oyster Creek

GB:dls:1595f
Enclosures

cc: NRC Resident Inspector
Oyster Creek Nuclear Generating Station
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Administrator
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