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June 14, 1985

NUCLEAR LICENSING & SAFETY DEPARTMENT

U. S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Washington, D. C. 20555

Attention: Mr. Harold R. Denton, Director

Dear Mr. Denton:

SUBJECT: Grand Gulf Nuclear Station
Units 1 and 2
Docket Nos. 50-416 and 50-417
License No. NPF-29
File: 0260/L-860.0
10CFR50, Appendix R
Raceway Support Evaluation
AECM-85/0191

The NRC conducted a site inspection of Grand Gulf Nuclear Station (GGNS) during the week of May 20, 1985, in the area of fire protection. Upon request, MP&L provided the inspectors a copy of an evaluation on file demonstrating that raceway supports did not need to be protected for a one-hour fire. The inspectors subsequently requested that the evaluation be formally submitted to NRR for review and approval as an exception to the requirements of 10CFR50 Appendix R. The raceway support evaluation and requested exception submittal was identified as Item 30 on the Audit Open Items List in the NRC exit interview conducted on May 24, 1985.

In accordance with the NRC request, Attachment 1 to this letter provides MP&L's formal request for exception to 10CFR50 Appendix R, Section III.G.2.a. Attachment 2 is a copy of the subject evaluation for NRC review.

In accordance with 10CFR170, an application fee of \$150.00 is enclosed. Please contact this office if you require further information.

Yours truly,

L. F. Dale
Director

MLC/JGC:dmm
Attachment

8506180384 850614
PDR ADOCK 05000416
G PDR

cc: (See Next Page)

Rec'd w/ check for
\$150.00 #92995P

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cc: Mr. J. B. Richard (w/a)
Mr. O. D. Kingsley, Jr. (w/a)
Mr. R. B. McGehee (w/a)
Mr. N. S. Reynolds (w/a)
Mr. G. B. Taylor (w/o)
Mr. R. C. Butcher (w/a)

Mr. James M. Taylor, Director (w/a)
Office of Inspection & Enforcement
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Dr. J. Nelson Grace, Regional Administrator (w/a)
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Atlanta, Georgia 30323

"RACEWAY SUPPORTS"

EXCEPTION REQUEST

Section III.G.2.a of Appendix R to 10CFR50 states that, "structural steel forming a part of or supporting such fire barriers shall be protected to provide fire resistance equivalent to that required of the barrier".

MP&L requests exception from the literal requirement of that stated above based on the following discussion.

SUMMARY AND BASIS FOR EXCEPTION

Additional guidance on Section III.G.2.a was provided in Generic Letter GL85-01 which indicated that supports only need to be protected if the failure of the support will result in a loss of the cable tray fire barrier. GL85-01 also indicated that an exception was not required if a structural evaluation existed and was available for audit. Raceway support steel supporting one hour barriers is not fire proofed at GGNS and based on the evaluation provided in Attachment 2 to this submittal, MP&L believes that additional fire protection is not required. However, as requested by the NRC inspection team during their visit to GGNS on May 20-24, 1985, MP&L requests relief from the literal requirements of 10CFR50 Appendix R, Section III.G.2.a for raceway supports in the areas listed in Attachment 2 to this letter.