

APR 22 1983

MEMORANDUM FOR: Darrell G. Eisenhut, Director
Division of Licensing

FROM: Richard H. Vollmer, Director
Division of Engineering

SUBJECT: FIRE PROTECTION REQUIREMENTS FOR FARLEY
NUCLEAR PLANT DOCKET NO. 80-348 AND 80-364
(TIA 83-32; TAC'S 51026 & 51027; PA 1162)

By memorandum to D. Eisenhut from J. Oshinski dated March 17, 1983, Region II requested comments as to the applicability requirements at Farley for the following items.

- (1) The failure to require all personnel assigned to the plant fire brigade to pass a physical examination for performing strenuous fire fighting activities.
- (2) The failure to specify an expiration date on "hot work" permits which are issued to control possible ignition sources within the plant.

Farley Unit 1 was licensed in 1977 and Farley Unit 2 was licensed in 1980. The fire protection programs at both units were reviewed using the guidelines of Appendix A to Branch Technical Position APCS 9.5-1 "Guidelines for Fire Protection for Nuclear Power Plants Docketed Prior to July 1, 1976" dated August 23, 1976, and "Nuclear Plant Fire Protection Functional Responsibilities, Administrative Control and Quality Assurance," dated June 14, 1977. Both Units should meet these guidelines unless specific deviations have been approved. "Appendix R Fire Protection Program for Nuclear Power Facilities Operating Prior to January 1, 1979 applies to units operating prior to 1979 which had unresolved fire protection issues identified in our Safety Evaluation Reports. However, any revisions to the fire protection program need to comply with the requirement of Appendix R. The requirements of Section III.G, III.J and III.O are to be backfitted to all operating plants regardless of previous approvals.

Therefore, Section III.G, III.J, and III.O apply to both units. Because Unit 1 had no open items in the Safety Evaluation Report, the other sections of Appendix R do not apply. However, any modifications contemplated by the licensee have to be consistent with all the requirements of Appendix R.

8305050274 830422
CF ADCK 05000349
CF

p/61

D. Eisenhut

- 2 -

The requirements are the same in all documents for the physical examination for fire brigade members, however, the requirements for an expiration date on "hot work" permits is only in Appendix R.

Physical Examination of Fire Brigade

NRC has only a requirement for a physical examination for fire brigade members. As long as the examination procedure is approved by the licensee's medical professionals, it should be acceptable.

No expiration date on "hot work" permits

NRC requirements prior to Appendix R did not specify the need for an expiration date on "hot work" permits. We assumed licensees were setting reasonable expiration dates. When Appendix R was issued, we established 24 hours as an expiration date while the plant was operating and the duration of the work when the plant was shutdown. In the latter case, we assume that a specific date would be specified for the duration of the work, e.g. if the work was to be completed within 3 days, the work permit would specify the expiration date as the date 3 days in the future. We deem work permits without a specific expiration date inadequate to control the use of ignitor sources.

Because these may be generic issues, all Regions should be informed.

151
Richard H. Vollmer, Director
Division of Engineering

cc: J. Taylor
W. Johnston
T. Novak
G. Lainas
F. Miraglia
V. Benaroya
O. Parr
R. Ferguson
W. Shields
S. Pawlicki
T. Sullivan
T. Wambach
R. Eberly
J. Stang
D. Kubicki
F. Nolan
E. Reeves
D. Notley

DE/MEB
RFerguson
4/13/83

DE/MEB
VBenaroya
4/13/83

DE/NCET
WJohnston
4/14/83

DE/ROV
RVollmer
4/14/83