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UNITED STATES

NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE. SUITE 1000 ARLINGTON. TEXAS 76211

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DEC 2 1983

MEMORANDUM FOR: J. M. Taylor, Deputy Director, IE

FROM:

J. E. Gagliardo, Director, Division of Resident, Reactor Project and Engineering Programs, RIV

SUBJECT: ITEMS FOR CONSIDERATION IN PREPARATION OF 10 CFR 50, APPENDIX R, CLARIFICATION LETTER

As requested during the meeting held on November 15, 1983, in Bethesda, to discuss fire protection of safe shutdown capability, here are the items we feel should be considered for clarification:

- Identify acceptable barrier materials and discuss acceptable installation criteria.
- Identify acceptable barrier penetration seal materials and installation techniques.
- 3. Discuss acceptance criteria for oil collection system.
- Discuss acceptance criteria for emergency lights, include acceptance of individual or one single battery power supply. Provide acceptance criteria for illumination level.
- Review the definitions of "fire zones" and "fire areas" and discuss their relation. Describe and define the criteria for suppression and detection installation with respect to "zones" and "areas."
- 6. Clarify what constitutes intervening combustibles.
- Present a clear case for the application of the criteria of 10 CFR 50, Appendix R, Section III.L to the evaluation of alternative shutdown capability under Section III.G.

The Region IV fire protection inspection of Fort St. Vrain raised unique questions as to the applicability of Appendix R to an HTGR technology plant. These questions were raised to and clarification requested of NRR in my letter of November 2, 1983, to Mr. D. G. Eisenhut.

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We are refraining from providing comments on enforcement actions but awaiting, instead, a draft proposal from IE.

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Should there be any questions or if we can be of any further assistance, please contact M. Murphy (728-8152) or R. Mullikin (728-8250).

J. E. Gagliardo, Director Division of Resident, Reactor Project and Engineering Programs

CC: E. G. Case, NRR R. C. DeYoung, IE V. Stello, EDO R. H. Vollmer, NRR PAS I, (II) III, V J. T. Collins, RIV T. F. Westerman, RIV E. H. Johnson, RIV