

April 28, 1986
Fort St. Vrain
Unit No. 1
P-86329

Public Service
Company of Colorado
P.O. Box 840
Denver, CO 80201-0840

R. F. WALKER
PRESIDENT

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

Attn: Mr. H. N. Berkow, Director
Standardization and Special
Projects Directorate

Docket No. 50-267

SUBJECT: Request for Fire
Protection Exemptions
Under 10CFR50.12

REFERENCES: 1) PSC Letter, Lee to
Johnson dated 4/1/85
(P-85113)
2) NRC Letter, Wagner to
Lee dated 6/4/85
(G-84176)

Dear Mr. Berkow:

On April 1, 1985 PSC submitted thirteen (13) exemption requests (P-85113) related to 10CFR50.48, and Sections III.G and III.J of Appendix R. Although not stated, these exemptions were submitted under 10CFR50.12, since exemption requests under 50.48(c)(6) were required to be submitted by March 19, 1981. The justification for each exemption was directed by the guidelines contained in NRC "Criteria for Evaluating Exemptions to Section III.G of Appendix R of 10CFR Part 50," as transmitted to PSC in Reference 2, for fire protection exemption requests, as well as the required basis for Appendix R exemptions stated in 10CFR50.48(c)(6).

Since that time, a revision to 10CFR50.12(a) has been issued, identifying special circumstances that must be present before the Commission will consider granting an exemption. In response to a recent telephone conversation with NRC staff personnel, PSC is hereby requesting that our previously submitted exemption requests (P-85113) be granted under the current issue of 10CFR50.12(a).

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The requested exemptions from 10CFR50.48(c), and Appendix R Sections III.G and III.J are in conformance with 50.12(a)(1) in that they are not in conflict with other legal requirements, do not present an undue risk to the public health and safety, and are consistent with the common defense and security.


Additionally, the requested exemptions represent special circumstances as allowed within 50.12(a)(2). Attached is a summary listing of exemption request titles and the applicable special circumstance in section 50.12(a)(2). Exemption Request 3.13 is a schedular exemption, with interim compensating measures provided, as described in Report 4, until modifications are completed. The exemption request describes the reasons for requiring the schedular exemption, and the good faith effort undertaken by PSC to comply with the regulation.

The remaining exemption requests relate to section 50.12(a)(2)(ii). For Exemption Request 3.8, an alternative means of providing emergency lighting is defined, to support performance of safe shutdown functions. For the other exemption requests, adequate separation and protection is provided following completion of modifications, such that one train of shutdown equipment will remain available and safe shutdown achieved. Thus, compliance with III.G or III.J of Appendix R is not necessary to achieve the underlying purpose of the rule for the situations addressed in the exemption requests.

Accordingly, we request that the exemptions defined and requested in Report 4 be granted under 50.12(a).

If you have any additional questions, please contact Mr. M. H. Holmes at (303) 480-6960.

Very truly yours,


R. F. Walker
President

RFW/FT:pa

Attachment

	<u>Exemption Request*</u>	<u>Applicable Section of 10CFR50.12(a)(2)</u>
3.1	Three-Room Control Complex - Structural Steel, Fire Doors, Dampers, and Penetration Seals	(ii)
3.2	Smoke Detection System-Control Room	(ii)
3.3	Fire Detection-Turbine Building	(ii)
3.4	Building 10 Structural Steel	(ii)
3.5	Access Control Bay	(ii)
3.6	Exterior Routing	(ii)
3.7	ACM/CCA Interface	(ii)
3.8	Emergency Lights-Facility Wide	(ii)
3.9	Common Wall-Turbine/Reactor Building	(ii)
3.10	Reactor Building	(ii)
3.11	Turbine building	(ii)
3.12	Diesel Generator Rooms-Fire Dampers	(ii)
3.13	Schedular Exemption	(v)

* From "Appendix R Evaluation: Fort St. Vrain Nuclear Generating Station,
Report No. 4," (P-85113).