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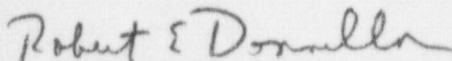
Subject: Comments on Draft Regulatory Guide DG-1069, "Fire Protection Program for Nuclear Power Plants During Decommissioning and Permanent Shutdown"

Ladies and Gentlemen:

The NRC is soliciting public comments on NRC Draft Regulatory Guide DG-1069, "Fire Protection Program for Nuclear Power Plants During Decommissioning and Permanent Shutdown," dated July 1998. Toledo Edison has reviewed the proposed regulatory guide and is submitting the attached comments.

Should you have any questions regarding this matter, please contact Mr. J. L. Freels, Manager - Regulatory Affairs, at (419)321-8466.

Very truly yours,



Robert E. Donnellon  
Director - Engineering and Services

KAS/laj

Attachment

cc: J. L. Caldwell, Acting Regional Administrator, NRC Region III  
S. J. Campbell, NRC Region III, DB-1 Senior Resident Inspector  
A. G. Hansen, NRC/NRR DBNPS Project Manager  
Utility Radiological Safety Board

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**Comments to NRC Draft Regulatory Guide DG-1069**  
**“Fire Protection Program for Nuclear Power Plants During**  
**Decommissioning and Permanent Shutdown”**

1) Section 3.3.1 - General:

This section recommends plant and contract personnel be trained in the use of fire extinguishers. This requirement is excessive and costly, since there could be more people on site during decommissioning than while the plant is operating. This would result in an unnecessary cost to train plant and contract personnel in the proper use of fire extinguishers. Any fire in the plant should first be reported to the control room by plant and contract personnel. The control room is responsible for assigning specially trained fire brigade members to extinguish the fire.

2) Section 3.3.2 - Fire Watch:

As stated above, the fire brigade is responsible for extinguishing plant fires. Plant personnel or contractors performing fire watches who are not involved in hot work do not need to be trained in fighting fires, but rather trained on the prompt reporting of the fire to the control room so that an appropriate response to the situation can be made without delay.

3) Appendix B - Spent Fuel Pool Area:

This section recommends suppression and detection systems for spent fuel pool areas. Due to the large, open nature of these spaces, the design and installation of these types of systems is difficult and expensive while at the same time the benefits are marginal in relationship to the cost required to install such systems.

4) Appendix B - Radioactive Waste Storage and Accumulation Areas, Including Temporary Structures:

This section recommends removing wastes on a daily basis. This requirement seems excessive and the paragraph should be changed to read “as the hazard warrants.”