



PECO NUCLEAR

A Unit of PECO Energy

John Doering, Jr.
Vice President
Peach Bottom Atomic Power Station

PECO Energy Company
1848 Lay Road
Delta, PA 17314-9032
717 456 4000
Fax 717 456 4243
E-mail: jdoering@peco-energy.com

November 5, 1998
Docket Nos. 50-277
50-278
License Nos. DPR-44
DPR-56

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Subject: Peach Bottom Atomic Power Station, Units 2 and 3,
Corrective Action Plan and Compensatory Measures for Fire
Areas Without Automatic Fire Detection

Dear Sir/Madam:

This letter provides information concerning the corrective action plan and interim compensatory measures being implemented for a discovered non-conforming condition at Peach Bottom Atomic Power Station (PBAPS). Certain Fire Areas within Unit 2, Unit 3 and common areas were discovered to not contain automatic fire detection systems as required by 10 CFR 50 Appendix R, Section III.F and as committed to in the PBAPS Updated Final Safety Analysis Report (UFSAR). This letter is being provided to document and summarize the discussions held between PECO Energy and NRC personnel during the week of October 26, 1998.

During a recent review of the elements of the fire protection program for a proposed modification to the Reactor Protection System (RPS) for PBAPS Unit 2, a PECO Energy employed Fire Protection Engineer identified that a portion of the Unit 2 RPS contained in the Turbine Building was not protected by an automatic fire detection system. Automatic fire protection systems are required to be installed in areas of the plant that contain or present an exposure fire hazard to Safety Related (SR) or Fire Safe Shutdown (FSSD) systems or components per 10 CFR 50 Appendix R, Section III.F and the PBAPS UFSAR. We conducted a more detailed review to determine whether there were other SR or FSSD systems or components that may require automatic fire detection. As a result, additional Fire Areas (FAs) were identified that required further consideration. The results of this detailed review identified a list of fire zones and rooms within the identified FAs that do not contain automatic fire detection systems and the non-conforming conditions are being resolved under the PECO Nuclear corrective action process.

These non-conforming conditions have been identified in a Non-Conformance Report (NCR) and a root cause analysis report that will effect the appropriate corrective actions. These conditions have been evaluated for operability, reportability and compensatory measures for both PBAPS Unit 2 and Unit 3 and considered plant operations in both shutdown and full power conditions. In each case we have verified that automatic fire detection systems are not required for the nearby SR and FSSD systems or components to perform their safety functions. Also, in each case, the ability to achieve and maintain FSSD in the event of a fire is fully retained in all of the FAs that do not contain the required automatic fire detection. Therefore, the necessary equipment remains operable, the conditions do not conflict with the Technical Specifications (TS) and the conditions do not present an undue risk to the public health and safety. The Facility Operating License (FOL) Conditions 2.C.(4) for PBAPS Units 2 and 3 permit changes to the Fire Protection Plan provided that the changes do not reduce the ability to achieve and maintain FSSD. Therefore, these conditions do not result in a condition prohibited by the FOLs. These conditions were evaluated to be not reportable using the guidance of NUREG 1022, Revision 1, "Licensee Event Report System." These conditions were reviewed for potential generic considerations and currently there are five (5) Fire Areas (FAs) that contain twenty five (25) rooms with SR and/or FSSD components without automatic fire detection and no NRC approved exemption from the requirements of 10 CFR 50 Appendix

1/0
A006

9811130205 981105
PDR ADOCK 05000277
F PDR

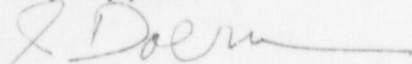
R, Section III.F. These FAs are contained within the Turbine Building, the Radwaste Building, the Unit 2 and Unit 3 Reactor Buildings, and the Diesel Generator Building.

Detailed evaluations of each identified room were performed involving the fire protection system manager, fire protection engineers, licensing personnel and engineering designers. These evaluations were performed to accurately define the scope of the areas affected, the existing fire protection features implemented in each room, the level of combustible loading in each room, the potential for impact on SR and FSSD components from an exposure fire from within the room and from adjacent areas, the appropriate long term corrective action and the appropriate interim compensatory measures. Currently, the results of the evaluation for each room has concluded that the existing level of fire protection provided by the Fire Protection Program adequately protects the SR and/or SSD systems and/or components within the room. The evaluation further concluded that the addition of automatic fire detection systems in each of these rooms would not enhance the response effectiveness of the plant fire brigade or minimize the potential damage to related SR or FSSD equipment. Therefore, benefit gained by the installation of an automatic fire detection system would be negligible. These evaluations are being used to form the basis that support the conclusion that special circumstances exist that meet the criteria of 10 CFR 50.12. With this information, an exemption request from the requirements of 10 CFR50 Appendix R, Section III.F for the identified Fire Areas is being prepared which we anticipate will be submitted to the NRC for review by November 16, 1998. We will work closely with the NRC to reach a timely resolution of these non-conforming conditions which will require NRC review and disposition of the exemption request before the final resolution is implemented and compliance is restored.

Since the final corrective actions will not be immediately implemented, we have performed a detailed evaluation to determine the appropriate compensatory measures needed to ensure adequate fire protection and reactor safety while the non-conforming conditions exist. This evaluation confirmed that the necessary equipment is operable and that the conditions do not conflict with the TS or the FOLs for PBAPS Units 2 and 3. This evaluation also concluded that the ability to achieve and maintain safe shutdown of the plant in the event of a fire is unaffected by the discovered conditions. Furthermore, the evaluation considered special actions, procedures and administrative controls that can enhance the capability of the SR and/or FSSD and the Fire Protection Program. This evaluation considered the guidance on compensatory measures contained within NRC Generic Letter 91-18, Revision 1, "Information to Licensees Regarding NRC Inspection Manual Section on Resolution of Degraded and Nonconforming Conditions," and NRC Information Notice 97-48, "Inadequate or Inappropriate Interim Fire Protection Compensatory Measures." Currently, we have instituted hourly fire watch patrol inspections for each of the accessible rooms which lack the required automatic fire detection. The accessibility determination includes consideration for high radiation fields and ALARA concepts. These compensatory measures will remain in effect until the NRC provides concurrence that an alternative compensatory measure is adequate, or until the NRC concurs that compensatory measures are not required, or until the non-conforming conditions are resolved. The non-conforming conditions, and the proposed corrective actions have been reviewed by the on-site Plant Operations Review Committee and PBAPS Management who concurred with the conclusions.

If you have any questions, please do not hesitate to contact us.

Very truly yours,



John Doering, Jr.

Vice President,

Peach Bottom Atomic Power Station

cc: H. J. Miller, Administrator, Region I, USNRC
A. C. McMurtry, USNRC Senior Resident Inspector, PBAPS
C. J. Anderson, Branch Chief, Region I, USNRC
M. C. Thadani, NRR Project Manager, USNRC

CCN 98-14087

November 05, 1998

Page 3

bcc: N. J. Sproul, Public Service Electric & Gas
R. I. McLean, State of Maryland
A. F. Kirby, III, Delmarva Power & Light Company/Atlantic Electric
R. R. Janati, Commonwealth of Pennsylvania
G. R. Rainey - 63C-3
C. P. Lewis - 63C-3
J. J. Hagan - 62C-3
J. Doering - PB, SMB4-9
M. E. Warner - PB, A4-1S
G. L. Johnston - PB, SMB3-2A
E. F. Sproat - 63B-1
R. W. Boyce - 63C-3
R. A. Kankus - 63C-5
J. A. Basilio, Sr. - 63A-3
O. A. Limpas - PB, SMB2-5
T. F. Geyer - PB, SMB2-1
M. J. Herr - PB, SMB2-1
C. D. Bruce - 63A-3
G. J. Lengyel - PB, A4-5S
J. G. Hufnagel/TRL - 62A-1
PBAPS ISEG - PB, SMB4-6
Commitment Coordinator - 62A-1
Correspondence Control Desk - 61B-5
DAC - 61B-5