## PHILADELPHIA ELECTRIC COMPANY

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## PHILADELPHIA, PA. 19101

(215) 841-5001 June 18, 1986

SHIELDS L. DALTROFF VICE PRESIDENT ELECTRIC PRODUCTION

> Docket Nos. 50-277 50-278

Mr. Daniel R. Muller, Director BWR Project Directorate #2 Division of Boiling Water Reactor Licensing U.S. Nuclear Regulatory Commission Washington, D.C. 20555

SUBJECT:	Peach Bottom Atomic Power Station, Units 2 and 3 10 CFR 50, Appendix R Structural Steel Survivability Analysis
REFERENCE:	(1) Letter, J. S. Kemper, PECo, to R. M. Bernero, NBC, dated March 7, 1986
	<ul> <li>(2) Telecon on May 28, 1986: G. Gears and J. Stang, NRC; G. Morley and G. Reid, PECo</li> </ul>

Dear Mr. Muller:

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PDR

In the reference (1) letter, Philadelphia Electric Company submitted a request for exemption from the requirement of 10 CFR 50, Appendix R, Section III.G.2, which requires that structural steel forming a part of or supporting fire barriers shall be protected to provide fire resistance equivalent to that required of the barrier. This letter provides additional information as requested in the reference (2) telephone conversation concerning the request for exemption.

The analysis on which the exemption request was based considered the ventilation which is available to support combustion in the various plant areas. In several plant areas, it is important that personnel doors remain closed to minimize ventilation flow into the area during a fire. In response to the request of the NRC Peach Bottom Project Manager and Staff Reviewer in the reference (2) telephone conversation, the following information is provided for two such areas:

 Turbine Building, Elevation 135', Emergency Switchgear Rooms and Battery Rooms - All personnel access doors to these rooms are located in plant fire barriers and are monitored to verify closure in accordance with Appendix R, Section III.N.

Unit 2 'C' RHR Pump Room, Elevation 91'6", 116' - The 2. structural steel survivability calculation for this area revealed that three doors had to be open into this room to provide sufficient ventilation to support a fire that would jeopardize exposed steel. Two watertight doors are located at Elevation 91'6". One door is in a plant fire barrier and the second door is not. Both doors are electrically supervised. The third door is a hollow metal personnel access door located on Elevation 116' and is not in a plant fire barrier. The third door is not supervised in accordance with the requirements of Appendix R, Section III.N, and is not required to be supervised in accordance with Section III.N. Access to the third door is through an electrically supervised personnel hatch and down a ladder from elevation 135'. In the unlikely event that this door is left open, the additional ventilation path would not increase the temperature of a fire in the area to a point that would jeopardize the exposed steel because, as stated above, ventilation air flow from three open doors is required for the critical steel temperature to be reached.

If you have any further questions regarding this matter, please do not hesitate to contact us.

Very truly yours,

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cc: T. P. Johnson, Resident Site Inspector