

November 19, 1999

Mr. James A. Hutton
Director-Licensing, MC 62A-1
PECO Energy Company
Nuclear Group Headquarters
Correspondence Control Desk
P.O. Box No. 195
Wayne, PA 19087-0195

SUBJECT: PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3 - REQUEST FOR ADDITIONAL INFORMATION (RAI) REGARDING REQUEST FOR EXEMPTION FROM SECTION III.F OF APPENDIX R TO 10 CFR PART 50 (TAC NOS. MA4498 AND MA4499)

Dear Mr. Hutton:

By letter dated December 31, 1998, PECO Energy Company submitted a request for an exemption from certain requirements specified in Section III.F of Appendix R to Part 50 of Title 10 of the *Code of Federal Regulations* (10 CFR). In order to continue our review of your request, additional information, as delineated in the enclosure, is required. The request for additional information was discussed with your staff on October 28, 1999, and a response date of January 14, 2000, was mutually agreeable.

Sincerely,

ORIGINAL SIGNED BY:
Bartholomew C. Buckley, Sr. Project Manager, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-277 and 50-278

Enclosure: RAI

cc w/encl: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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A handwritten signature in cursive script that reads "Bartholomew C. Buckley, Sr.".

Bartholomew C. Buckley, Sr. Project Manager, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

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cc w/encl: See next page

Peach Bottom Atomic Power Station,
Units 2 and 3

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REQUEST FOR ADDITIONAL INFORMATION
PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3
APPENDIX R EXEMPTION REQUEST

1. The exemption request states that all cables within the fire areas that are the subject of this exemption request meet flame retardant standards that are "similar" to the flame retardant rating specified in the Institute of Electrical and Electronic Engineers (IEEE) Standard 383-1974, "IEEE Standard for Type Test of Class 1E Electrical Cables, Field Splices and Connections for Nuclear Power Generating Stations," and therefore, (1) will not propagate a fire and are self-extinguishing, and (2) will not ignite or contribute to fire growth without a flame source. Provide a detailed description of the fire resistive test(s) including the acceptance criteria and any deviations from the IEEE 383 standard, that were used to qualify the cables in the subject fire areas. Provide a technical basis for the conclusion that the subject cables will "not ignite or contribute to fire growth without a flame source," as this is not part of the testing criteria specified in IEEE 383.
2. For the fire areas that are the subject of this exemption request that are provided or will be provided with automatic sprinkler protection, verify that sprinkler coverage is provided throughout the fire area and that the subject sprinkler systems are designed, installed, and maintained in accordance with the applicable standards published by the National Fire Protection Association (NFPA). Provide a technical justification for any deviations from the applicable NFPA standards.
3. For several fire zones that are the subject of this request, credit is taken for smoke and or heat detection that is provided in "adjacent areas." Provide a technical justification for the conclusion that the detection provided in "adjacent areas" would be effective at detecting an incipient fire in the areas/zones that are the subject of this request. Provide information on the spacing of these detectors in comparison to the listing/approval for the devices and the ventilation paths that communicate with these "adjacent areas."
4. The cost estimate submitted with the request for providing automatic detection estimates a total cost to achieve compliance of \$4.9 million. The cost breakdown for each fire area/zone range from approximately \$35 to \$50 per square foot. Based on Means Repair and Remodeling Cost Data, typical costs for retrofitting automatic detection in industrial facilities range from \$1 to \$3 per square foot. Explain the method and assumptions used to prepare the cost estimates submitted with the exemption request.
5. Peach Bottom Atomic Power Station (PBAPS) has been previously granted approximately 20 exemptions from the technical requirements specified in Appendix R to 10 CFR Part 50. Identify any fire areas or fire zones that are the subject of this request that have previously approved exemptions. For those areas/zones with previously approved exemptions, provide an assessment of the impact, if any, of the lack of automatic detection on the previously approved exemptions.

Enclosure

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6. The exemption request references the PBAPS Individual Plant Evaluation for External Events (IPEEE), however the fire area and fire zone designations in the IPEEE are different than the fire area and fire zone designations used in the subject request. Provide a cross-reference document for the fire areas and fire zones in the IPEEE to those that are the subject of this exemption request to enable the staff to assess the risk significance of the request.
7. For the safe shutdown (SSD) cables in each of the fire zones that are the subject of this request, provide a description of the system(s) associated with the SSD cable(s).