

December 29, 2000

Mr. Michael Kansler
Sr. Vice President and Chief
Operating Officer
Entergy Nuclear Operations, Inc.
440 Hamilton Avenue
White Plains, NY 10601

SUBJECT: JAMES A. FITZPATRICK NUCLEAR POWER PLANT - REQUEST FOR
ADDITIONAL INFORMATION REGARDING 10 CFR PART 50, APPENDIX R
EXEMPTIONS (TAC NO. MB0395)

Dear Mr. Kansler:

On October 30, 2000, James A. FitzPatrick Nuclear Power Plant formally requested an exemption to 10 CFR Part 50, Appendix R, "Fire Protection Program for Nuclear Power Facilities Operating Prior to January 1, 1979." On November 21, 2000, PASNY's ownership interest in FitzPatrick was transferred to Entergy Nuclear FitzPatrick LLC, to possess and use FitzPatrick and to Entergy Nuclear Operations, Inc. to possess, use and operate FitzPatrick. The U.S. Nuclear Regulatory Commission would continue to review and act on all requests before the Commission which had been submitted by PASNY before the transfer. Accordingly, the staff continued its review of the technical basis provided in the October 30, 2000, submittal concerning the subject exemption. In order to evaluate whether the proposed exemption request provides an equivalent level of fire protection and safe shutdown capability in accordance with 10 CFR 50.48 and applicable sections of 10 CFR Part 50, Appendix R, the NRC staff requires additional information. Enclosed is the staff's request for additional information concerning the request for a 10 CFR Part 50, Appendix R exemption.

We have discussed this with your staff and they have indicated that you would be able to respond within 30 days of receipt of this letter.

Sincerely,

/RA/

Guy S. Vissing, Senior Project Manager, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-333

Enclosure: As stated

cc w/encl: See next page

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James A. FitzPatrick Nuclear Power Plant

Mr. Michael Kansler
Sr. Vice President and Chief Operating
Officer
Entergy Nuclear Operations, Inc.
440 Hamilton Avenue
White Plains, NY 10601

Mr. Jerry Yelverton
Chief Executive Officer
Entergy Operations
1340 Echelon Parkway
Jackson, MS 39213

Mr. Theodore H. Sullivan
Vice President Operations
Entergy Nuclear Operations, Inc.
James A. FitzPatrick Nuclear Power Plant
P.O. Box 110
Lycoming, NY 13093

Mr. Dan Pace
Vice President, Engineering
Entergy Nuclear Operations, Inc.
440 Hamilton Avenue
White Plains, NY 10601

Mr. John Kelly
Director - Licensing
Entergy Nuclear Operations, Inc.
4400 Hamilton Avenue
White Plains, NY 10601

Mr. George Tasick
Licensing Manager
Entergy Nuclear Operations, Inc.
James A. FitzPatrick Nuclear Power Plant
P.O. Box 110
Lycoming, NY 13093

Resident Inspector's Office
U. S. Nuclear Regulatory Commission
P.O. Box 136
Lycoming, NY 13093

Mr. Harry P. Salmon, Jr.
Director of Oversight
Entergy Nuclear Operations, Inc.
440 Hamilton Avenue
White Plains, NY 10601

Ms. Charlene D. Faison
Licensing
Entergy Nuclear Operations, Inc.
440 Hamilton Avenue
White Plains, NY 10601

Supervisor
Town of Scriba
Route 8, Box 382
Oswego, NY 13126

Charles Donaldson, Esquire
Assistant Attorney General
New York Department of Law
120 Broadway
New York, NY 10271

Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Oswego County Administrator
Jack Tierney
46 East Bridge Street
Oswego, New York 13126

Mr. F. William Valentino, President
New York State Energy, Research,
and Development Authority
Corporate Plaza West
286 Washington Avenue Extension
Albany, NY 12203-6399

Mr. Arthur Zaremba, Licensing Manager
Director, Safety Assurance
Entergy Nuclear Operations, Inc.
James A. FitzPatrick Nuclear Power Plant
P.O. Box 110
Lycoming, NY 13093

Mr. Paul Eddy
Electric Division
New York State Dept. of Public Service
3 Empire State Plaza, 10th Floor
Albany, NY 12223

James A. FitzPatrick Nuclear Power Plant

cc:

Michael J. Colomb
General Manager
Entergy Nuclear Operations, Inc.
James A. FitzPatrick Nuclear Power Plant
P.O. Box 110
Lycoming, NY 13093

Mr. James Knubel
Vice President, Operations Support
Entergy Nuclear Operations, Inc.
440 Hamilton Avenue
White Plains, NY 10601

Mr. John M. Fulton
Assistant General Counsel
Entergy Nuclear Generation Co.
Pilgrim Station
600 Rocky Hill Road
Plymouth, MA 02360

Mr. J. Spath, Program Director
New York State Energy, Research, and
Development Authority
Corporate Plaza West
286 Washington Avenue Extension
Albany, NY 12203-6399

Mr. Ronald Schwartz
SRC Consultant
64 Walnut Drive
Spring Lake Heights, NJ 07762

Mr. Ronald J. Toole
SRC Consultant
Toole Insight
605 West Horner Street
Ebensburg, PA 15931

Mr. Charles W. Hehl
SRC Consultant
Charles Hehl, Inc.
1486 Matthew Lane
Pottstown, PA 19465

REQUEST FOR ADDITIONAL INFORMATION ON THE EXEMPTION REQUEST

JAMES A. FITZPATRICK NUCLEAR POWER PLANT

DOCKET NO. 50-333

- 1) Page 2 - The exemption request states that more than 90% of the combustibles in the area with the fire wrap are cable. State what constitutes the other "less than 10%" of the combustible loading in the fire area. Also, describe the proximity of the non-cable combustibles in relation to the fire wrap.
- 2) Page 2 - No information is provided as to the type of cable which makes up the majority of the combustibles in the area. Are the cables IEEE 383 rated, or have they been evaluated as equivalent to IEEE 383 (if so, provide technical justification for equivalency)? If some or all of the cables are neither rated nor equivalent, is there any evidence that the installed cables restrict flame spread (if so, provide technical justification). Provide a basis for the assertion made on, Page 12 of Attachment 2, Section 12, Fire Scenario, which states that, "a fire in this zone is postulated to be a slowly developing cable fire."
- 3) Page 2 - No discussion of transient ignition sources is discussed in the exemption request. What controls are in place for hot work, such as cutting, welding, etc., in the fire area? Do the controls in the fire area with the fire wrap differ from the controls in place for other plant fire areas?
- 4) Page 3 - It is stated that there are evaluations and justification of the installed fire detection system not meeting the code. Provide a basis and technical justification that the code deviations do not adversely impact system performance.
- 5) Page 3 - Include the type of hazard classification to which the sprinkler system was designed, light, ordinary, extra hazard, the basis for the classification, and the technical justification that the classification is appropriate for the hazard.
- 6) Page 3 - It is stated that water hose lines are located in the zone. For significant fire scenarios the fire brigade would have to prepare hose lines prior to entering the fire area. Discuss the availability of fire hoses outside the area which the brigade would use prior to entering the area.
- 7) Page 5 - Section iii of 10 CFR 50.12(a)(2) is included in the exemption which discusses undue hardship or costs. Discuss how this exemption qualifies under Section iii of
- 8) 10 CFR 50.12(a)(2) which discusses undue hardship and/or costs, specifically discuss undue hardship and/or costs if this exemption were not to be approved.

Note: Page 5 - The quote from 10 CFR 50.12(a)(2) is missing the word 'not' from the fourth line between 'is' and 'necessary'.

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- 9) Page 12 - The discussion of administrative controls, states that 15 gallons of combustible liquid is allowed to be stored in the area without a permit or evaluation. Is there any restriction concerning storing this in the area of the fire barrier (i.e., is there an exclusion zone)?
- 10) Page 9 - The transient combustible limits for the fire area are 15 gallons of combustible liquid and 25 lbs. of plastic. The submittal neither describes any restrictions on placement of these materials in the fire area nor describes any controls on ignition sources. Would a fire involving this postulated combustible load in the area of the fire wrap result in fire damage more severe than an ASTM E-119 fire exposure? Provide technical justification for your conclusion.