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KNIGHTON, G.W. Licensing Branch 3

SUBJECT: Advises that fire protection sys not in literal compliance w/Branch Technical Position 9.5-1. Although internal conduit seal configurations differ from position, acceptable fire protection provided.

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October 28, 1982

Director, Office of Nuclear Reactor Regulation  
Attention: Mr. George W. Knighton, Branch Chief  
Licensing Branch No. 3  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362  
San Onofre Nuclear Generating Station  
Units 2 and 3

License Condition 2.C(14)c of the San Onofre Nuclear Generating Station Unit 2 (SONGS 2) Operating License, NPF-10, required that Southern California Edison Company (SCE) identify and describe any deviations of the SONGS 2 fire protection system from the acceptance criteria of Section 9.5-1 of the Standard Review Plan (NUREG-0800, dated July 1981). On July 22, 1982 SCE submitted a letter to the NRC to satisfy this license condition.

Subsequently, it has been brought to SCE's attention that an additional area of SONGS 2 and 3 fire protection is not in literal compliance with the Branch Technical Position (BTP) 9.5-1 guidelines. Specifically, BTP 9.5-1, item C.5.a(3) recommends that, for conduit penetrations through fire barriers, openings inside conduit 4 inches or less in diameter should be sealed at the fire barrier unless the conduit extends at least 5 feet on each side of the fire barrier and is sealed at both ends or at the fire barrier with noncombustible material to prevent the passage of smoke and hot gas. This is a new requirement over previous guidelines which were not specific as to the configuration of the conduit seals and only required that the seal fire rating be at least equivalent to that of the penetrated fire barrier. The purpose for internal sealing of conduit is to restrict the passage of smoke and hot gases, thus preventing fire from propagating through fire barriers and affecting redundant trains of safety related equipment. While the configuration of internal conduit seals at SONGS 2 and 3 differs from that recommended in BTP 9.5-1, it meets these functional criteria.

Boo!

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All conduit used at SONGS 2 and 3 is 4 inches or less in diameter. Conduits which penetrate fire barriers are internally sealed at or near the fire barrier with noncombustible silicone foam which provides an equivalent fire rating to that of the penetrated barrier and restricts the passage of smoke. The noncombustible silicone foam sealing material is the same as that used for fire barrier penetration seals. The penetration seals have been tested to demonstrate that the penetration seal is of equivalent fire rating to that of the penetrated barrier and that it remains intact and does not allow the projection of water beyond the unexposed surface. In addition to internal sealing of conduits, the use of cable with self-extinguishing flame retardent insulation further reduces the probability of fire propagating past fire barriers through conduit. All cable insulation used at SONGS 2 and 3 meets the requirements of IEEE 383-1974 with the exception of the PVC insulation used on a limited number of non-safety related communications cables which are identified in the Fire Hazards Analysis.

Based upon the above, SCE considers that the conduit internal sealing criteria used at SONGS 2 and 3 effectively prevents fire from propagating through conduit and affecting redundant trains of safety related equipment. Even though the configurations of internal conduit seals at SONGS 2 and 3 differ from those recommended by BTP 9.5-1, SCE believes that acceptable fire protection has been provided.

Should you have any questions regarding this information, please call me.

Very truly yours,

*KP Bushni*

cc: Harry Rood, NRC (to be opened by addressee only)  
R. H. Engelken, NRC Region V