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 FACIL: 50-261 H. B. Robinson Plant, Unit 2, Carolina Power and Ligh 05000261
 AUTH. NAME AUTHOR AFFILIATION
 HALL, R.E. Brookhaven National Laboratory
 RECIP. NAME RECIPIENT AFFILIATION
 FERGUSON, R.L. Chemical Engineering Branch

SUBJECT: Forwards comments on plant 800128 request for supplement to
 SER, issued as part of Amend 31 to OL re fire protection. Also
 discusses util 800318 submittal.

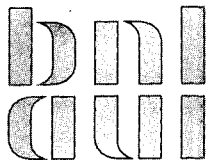
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MAY 12 1980

BROOKHAVEN NATIONAL LABORATORY
ASSOCIATED UNIVERSITIES, INC.

Upton, New York 11973

Department of Nuclear Energy

(516) 345- 2144

April 29, 1980

Mr. Robert L. Ferguson
Chemical Engineering
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

RE: H.B. Robinson, Fire Protection Review

Dear Bob:

Attached are our comments on H.B. Robinson's request for SER changes and comments on their submittal of March 18, 1980.

The format for the comments on the SER changes is per your telephone instructions last week. Note that only 3 of the 9 items that were approved had been noted in the SER for review.

The licensee's letter of March 18 has been answered. Items 3.1.11 (3.2.4) 3.1.17, 3.1.21, 3.1.24, 3.2.2, 3.2.3, 3.2.5, 3.2.8, and 3.2.9 have been addressed. Item 3.2.7 was not assigned to Brookhaven National Laboratory (BNL). We have not as yet received your letter dated February 21, 1980 to the licensee; we would appreciate you sending us a copy if it is to be included in our input to you.

Respectfully yours,

Robert E. Hall, Group Leader
Reactor Engineering Analysis

REH:EAM:sd
attachment

cc.: W. Kato wo/att.
 T. Lee
 M. Levine wo/att.
 E. MacDougall

1006
5/1

H.B. ROBINSON
Fire Protection Review

Request for Supplement to SER

On January 28, 1980, Carolina Power and Light Company requested a supplement to H.B. Robinson Unit 2 SER which had been issued as part of Amendment 31 to the operating license.

The licensee has proposed to change 12 prior commitments. We have reviewed the letter of January 28, 1980 and have the following recommendations. We recommend that the staff accept the following as written:

- Item No. 1 - Serial No. 3.1.2*
- Item No. 3 - Serial No. 3.1.5, 3.1.9
- Item No. 4 - Serial No. 3.1.14
- Item No. 5 - Serial No. 3.1.17*
- Item No. 6 - Serial No. 3.1.23
- Item No. 7 - Serial No. 3.1.10
- Item No. 10 - Serial No. 3.1.27
- Item No. 11 - Serial No. 3.1.2*
- Item No. 12 - Serial No. 3.1.7

Two of the requested changes proposed to provide protection different from that previously agreed to, but indicated that the conceptual details would not be available until about May 1980. Therefore, the acceptability of these proposed changes cannot be assessed now. These items are No. 2 (3.2.4*) and No. 9 (3.1.4*).

One of the requested changes, No. 8 (3.1.9) proposed that the completion date for design and installation of the cable spreading room Halon system be extended to the end of 1980 refueling outage. The licensee stated that this additional time was necessary to complete the redesign of the presently installed system. Subject to NRC's determination of the acceptability of the revised timetable, we find the licensee's request acceptable.

*SER items where review is required.

H.B. ROBINSON
Fire Protection Review

Item 3.1.11 - Portable Fire Extinguishers and
Item 3.2.4 - Containment General Area

By letter dated December 11, 1979, BNL evaluated the licensee's previous submittals on these SER sections, and had recommended that the staff require the licensee to install a 2-1/2 gallon pressurized water fire extinguisher in the control room and standpipe and hose stations in containment.

By letter dated March 18, 1980, the licensee indicated that a 2-1/2 gallon pressurized water fire extinguisher has been installed in the control room. The licensee also committed to install standpipes and hose stations in containment to provide manual hose coverage for fire hazards therein.

We recommend that the staff accept the licensee's proposal.

Item 3.1.17 - Insulation of Pipes

By letter dated December 11, 1979, BNL had evaluated the licensee's previous submittals on this SER Section. There are service water lines and the "A" diesel generator fuel supply line that run through the "B" diesel generator room. The heat transfer calculations submitted by the licensee in support of this modification appear satisfactory, pending the receipt of additional information on the thermal properties of the insulation at high temperatures. By letter dated March 18, 1980, the licensee committed to compile and submit thermal property information for the proposed piping insulation not later than June 1, 1980. In their letter of January 28, 1980, the licensee stated that the "A" diesel generator fuel supply line will no longer be routed through the "B" diesel generator room. Therefore the piping lines referred to above are the service water lines which have not been rerouted out of the "B" diesel generator room.

We will complete our evaluation of this section following review of the licensee's information on the thermal properties of the piping insulation for the service water lines.

Item 3.1.21 - Lube Oil Shielding System

By letter dated December 11, 1979, BNL had evaluated the licensee's previous submittals on this SER Section, and required the licensee to provide a lube oil collection system conforming to certain criteria at each reactor coolant pump.

By letter dated March 18, 1980, the licensee proposed to install a fixed fire suppression system in each reactor coolant pump bay in lieu of the previously proposed lube oil spill collection system. The fire suppression system would be manually activated following receipt of a fire alarm signal from automatic fire detectors in the reactor coolant pump bay.

The proposed manual actuation of the suppression system may not provide the fast response necessary for prompt suppression of postulated lube oil fires. Accordingly, we recommend that the licensee provide an automatically actuated fixed fire suppression system, such as a preaction sprinkler system, in each reactor coolant pump bay.

Item 3.1.24 - Electrical Cable Penetrations

By letter dated December 11, 1979, BNL evaluated the licensee's previous submittal on this SER Section and requested additional information.

By letter dated March 18, 1980, the licensee indicated that additional testing or research would be required to provide this information. The licensee committed to provide the information by June 1, 1980.

We will complete our evaluation of this SER section following receipt of the required information.

Item 3.2.2 - Fire Door Supervision

By letter dated December 11, 1979, BNL evaluated the licensee's previous submittals on this SER Section and had recommended that the licensee justify the absence of locks and/or electrical supervision of all doors to areas containing safety related cables or equipment. We also recommend that the licensee be requested to verify that electrically supervised doors are provided with a time delay alarm in a constantly manned location.

By letter dated March 18, 1980, the licensee indicated that fire doors will be modified or procedures amended as necessary to comply with the staff's requirements.

We recommend that the staff accept the licensee's proposal.

Item 3.2.3 - Propane Tank and Piping

By letter dated December 11, 1979, BNL had evaluated the licensee's previous submittals on this SER Section and had required the licensee to replace the propane engine with a diesel engine, or relocate the propane engine-driven fire pump and associated equipment to a location substantially remote from any safety-related equipment.

By letter dated March 18, 1980, the licensee proposed to replace the propane engine with a diesel engine, and to relocate the propane tank to the Unit No. 1 (non-nuclear) intake structure.

We recommend that the staff accept the licensee's proposal.

Item 3.2.5 - Containment Cable Penetration Area

By letter dated January 21, 1980, the staff evaluated the licensee's previous submittals on this SER Section and had required the licensee to provide additional protection in the area to preserve the safe shutdown capability and to provide the capability for suppressing fire.

By letter dated March 18, 1980, the licensee proposed to install a manually actuated dry pipe sprinkler system and automatic fire detection in this area.

The licensee's proposal does not provide sufficient assurance of prompt fire suppression or preservation of at least one division of cables in the event of a failure of the fire suppression system. In our letter to the staff of December 11, 1979, we noted that a complete evaluation of this area cannot be made without a detailed examination of the area. We continue to make this recommendation; in the absence of this examination, we recommend that the fixed fire suppression system be made automatic and that one division of cables throughout the containment be separated from the other by a one-hour rated fire barrier wherever the danger from a common exposure fire exists.

Item 3.2.8 - Fire Hose Replacement

By letter dated December 11, 1979, BNL had recommended that the licensee replace the existing linen hoses, when they are due for replacement, with mildew-proof, heat-resistant, 100 percent polyester single jacket, synthetic rubber lined hoses rated not less than 300 psi by UL/FM label.

By letter dated March 8, 1980, the licensee committed to comply with this requirement.

We recommend that the staff accept the licensee's proposal.

Item 3.2.9 - Fire Hydrant Cold Weather Protection

By letter dated December 11, 1979, BNL had evaluated the licensee's previous submittal on this SER Section and had required the licensee to perform semianual inspections of outside hydrants.

By letter dated March 19, 1980, the licensee indicated that they now comply with this requirement through performance of periodic test PT-9.0.B.

We recommend that the staff review the licensee's test procedure.