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 STALZ, J.F. Operating Reactors Branch 4

SUBJECT: Forwards clarification of util commitments to comply w/facility fire protection safety evaluation. Addl mods not necessary to demonstrate compliance w/SER.

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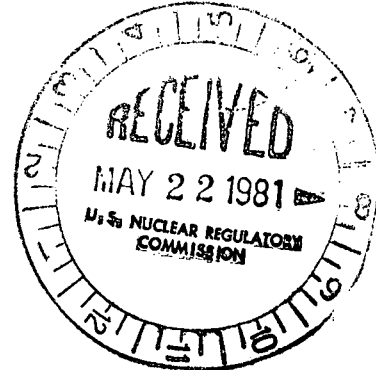
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WILLIAM O. PARKER, JR.  
VICE PRESIDENT  
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May 15, 1981

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Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555



Attention: J. F. Stalz, Chief  
Operating Reactors Branch No. 4

Re: Oconee Nuclear Station  
Docket Nos. 50-269, -270, -287

Dear Sir:

During an internal review of the Fire Protection Program at Oconee Nuclear Station, it was determined that several items had been implemented in a manner that was technically equivalent to that specified in the Staff's Fire Protection Safety Evaluation Report of August 11, 1978. The attached provides a discussion of each one of the above items.

Based on our review, these items, as implemented, provide the necessary degree of fire protection measures which were required by the original SER. As such, it is considered that no additional modifications are necessary to demonstrate compliances with the original SER.

Very truly yours,

*William O. Parker, Jr.*  
William O. Parker, Jr.

WOP/djs  
Attachment

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CLARIFICATIONS OF COMMITMENTS TO  
COMPLY WITH OCONEE FIRE PROTECTION  
SAFETY EVALUATION REPORT

- a) Section 3.1.3 Fire Doors - "Fire doors will be provided for doorways into the HVAC rooms from the cable spreading rooms (5.7) and the equipment rooms (5.4)."

Section 5.4.6 Modification and Recommendations Subsection(b) (2) - "replacing the door to HVAC equipment room with three-hour rated door."

Since the equipment in the HVAC rooms serves only the area in question (i.e. the HVAC room in Unit 3 cable spread room serves only the Unit 3 cable room, etc.) and the combustible loading in the HVAC rooms is negligible, the commitment was withdrawn in W O Parker's February 22, 1978 letter to E G Case.

- b) Section 3.1.18 Reactor Building Communications - "The licensee has committed to provide an analysis to show that the existing communications system--- modification will be made to provide an acceptable alternative (4.7)."

Section 4.7 Communication Systems - "Normal communications within the plant are provided--- room. If the adequacy of the existing system cannot be demonstrated modifications will be made to provide an acceptable alternative."

W O Parker's February 17, 1978 letter to E G Case states that "Fixed repeaters will be provided for communication inside the Reactor Building unless it is determined that the use of repeaters will affect the operation of nuclear instrumentation."

Fixed repeaters have been provided. These are disconnected during unit operation but are connected if the units are brought to a cold shutdown condition.

- c) Section 4.3.1.5 Automatic Sprinkler Systems - "Sprinkler and water spray systems are designed according to applicable NFPA standards."

Section 5.4.6 Modifications and Recommendations Subsection (f) - "To provide a manually actuated open head fog-type water spray system in each equipment room."

Section 5.7.6 Modifications and Recommendations Subsection (d) - To Provide a manually actuated open head fog-type water spray system in each cable spreading room."

These items are in conflict. The sprinkler systems are manually actuated and open head as outlined in W O Parker's July 19, 1978 letter to E G Case. The system is designed to provide a density of 0.1 GPM per sq. ft.

- d) Section 4.9.2 Fire Doors and Hatches - The SER states the following:

"The licensee has proposed to make the following modifications on doors and hatches in fire barriers:

- (1) Replace unlabeled fire doors and frames in fire barriers with properly labeled doors and frames."

In several cases doors and frames which have been approved by the insurance carrier based on review of construction are utilized to meet this commitment.

e) Section 4.9.2 Fire Doors & Hatches - The SER states the following:

"The licensee has stated that doors separating redundant safe shutdown equipment or protecting safe shutdown equipment from large hazards are alarmed to the control room and provided with automatic closure devices."

W O Parker's February 17, 1978 letter to E G Case stated the following:

Position II (NRC Position) - Doors separating the Turbine and Auxiliary Building with the exception of the rolling fire doors should be locked or alarmed in the control room.

Response - Access to all areas in the Auxiliary Building containing safe shutdown equipment is controlled by either rolling fire doors or doors that are locked and alarmed to the guard facility.

One of the following measures has been implemented for each of the fire doors separating the Turbine and Auxiliary Building:

1. The fire doors are kept closed and electrically supervised at a continuously manned location; or
2. The fire doors are locked closed and inspected weekly to verify that the doors are in the closed position; or
3. The fire doors are provided with automatic hold open and release mechanisms and inspected daily to verify that doorways are free of obstructions; or
4. The fire doors are kept closed and inspected daily to verify that they are in the closed position.