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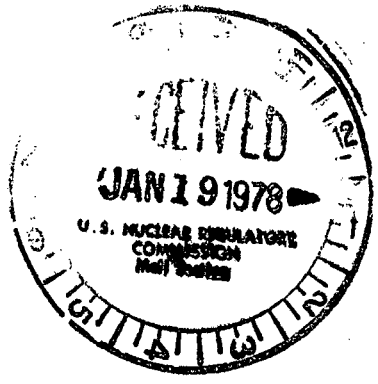
DUKE POWER COMPANY
POWER BUILDING
422 SOUTH CHURCH STREET, CHARLOTTE, N. C. 28242

WILLIAM O. PARKER, JR.
VICE PRESIDENT
STEAM PRODUCTION

January 16, 1978

TELEPHONE: AREA 704
373-4083

Mr. Edson G. Case, Acting Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555



Attention: Mr. A. Schwencer, Chief
Operating Reactors Branch #1

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

Dear Mr. Case:

As requested during your October 3, 1977 fire protection review of Oconee Nuclear Station, please find attached a comparison of the Oconee fire protection program to the positions outlined in the document "Nuclear Plant Fire Protection Functional Responsibilities, Administrative Controls and Quality Assurance", transmitted by your letter of August 19, 1977.

Very truly yours,

William O Parker Jr /ls

William O. Parker, Jr.

LJB:ge

Attachment

A006
1/1

OCONEE NUCLEAR STATION
FIRE PROTECTION PROGRAM

COMPARISON TO THE NUCLEAR REGULATORY COMMISSION'S

"NUCLEAR PLANT FIRE PROTECTION FUNCTIONAL RESPONSIBILITIES, ADMINISTRATIVE CONTROLS AND QUALITY ASSURANCE"

January 16, 1978

FIRE PROTECTION ORGANIZATION

RESPONSE TO 1.0 a & b

The offsite management positions responsible for implementation of the fire protection program are outlined in Section A.1 of Duke Power Company's Response to Appendix A to Branch Technical Position APSCB 9.5-1, "Guidelines for Fire Protection for Nuclear Power Plants Docketed Prior to July 1, 1976," which was transmitted by our letter of December 31, 1976. Organizational charts relating positions and jurisdiction statements outlining division and group responsibilities are being amended to include fire protection responsibilities.

In addition to these management positions Technical Specifications have have been proposed which require the Nuclear Safety Review Board (NSRB) to audit the fire protection program and implementing procedures annually. The Director of the NSRB reports the results of the audit directly to the Vice President, Steam Production. Reports of the audit are also transmitted to the Senior Vice President, Production and Transmission, and to the management positions responsible for the areas audited.

An independent fire protection and loss prevention inspection and audit to be performed annually by qualified off-site personnel and an inspection and audit by a qualified fire consultant to be performed at intervals of no greater than three years is also provided for by the proposed Technical Specifications.

RESPONSE TO 1.0c

The Station Manager is responsible for overall administration of plant operations and emergency plans. The organization chart in Enclosure 1 shows the organization as it applies to fire protection with brief description of responsibilities.

RESPONSE TO 1.0d

(1) To minimize the amount of conbustibles in safety-related areas and determine the effectiveness of housekeeping practices, the station group superintendents perform monthly inspections of assigned areas to assure that housekeeping and storage practices are according to station directives and procedures. The Safety Supervisor (Fire Protection Supervisor) performs frequent inspections to also insure proper housekeeping and storage.

The availability and acceptable condition of all fire protection systems and equipment are assured by the procedures and practices of the Maintenance, Operations and Technical Services Groups. Emergency breathing apparatus is maintained by the Technical Services Group. Communications equipment is maintained by the Maintenance Group. Emergency lighting equipment is maintained by the Operations Group. Fire stops and penetrations seals are maintained by the Maintenance Group and periodically inspected by the

Administrative Services Group. Procedures and Station Directives are used by Maintenance, Operations and Technical Services to assure that prompt and effective corrective actions are taken to correct conditions adverse to fire protection and preclude their recurrence.

(2) Fire fighting training is the responsibility of the Administrative Services Group. The design and selection of equipment is the responsibility of the Design Engineering Department. Periodic inspections and tests are performed on various equipment by Operations, Maintenance and Technical Services as described in (1) above.

(3) The Administrative Services Group is responsible for conducting and critiquing fire drills.

(4) The supervisor in charge of a work activity is responsible for identifying transient fire loads and maintaining them within the guidelines of Station Directive 3.11.5.

(5) The Superintendent of the group for which contractor personnel are working is responsible for assuring that such personnel are properly indoctrinated.

(6) The Administrative Services Group is responsible for instructing personnel in the handling of events that affect fire protection.

RESPONSE TO 1.0e

The Quality Assurance Organization assures the effective implementation of the fire protection program by planned inspections and audits. Results are reported to appropriate personnel.

RESPONSE TO 1.0f

(1) & (2) The plant fire brigade positions and responsibilities are defined in Station Directive 5.3.1. This directive outlines the authority and duties of each brigade position.

(3) & (4) All available fire brigade members respond to fire emergencies. To assure sufficient response all operations shift and guard force personnel receive fire brigade training. They are available in numbers such that sufficient brigade members can respond without being in conflict with other requirements.

(5) The guidance incorporated in NFPA No. 27 "Private Fire Brigades" has been utilized in the establishment of the Oconee fire brigade to the extent practical.

RESPONSE TO 2.0a

As stated in our December 31, 1976 letter referred to in Response to 1.0 a & b, a registered fire protection engineer with twenty-five years of experience in the field of industrial fire protection has been engaged on a consulting basis. A copy of the consultant's resume is included in that report.

RESPONSE TO 2.0b

The Fire Brigade members receive physical examinations and training as described in the response to the positions in Attachment #2.

RESPONSE TO 2.0c

Employees performing maintenance and testing are qualified in accordance with ANSI 18.1-1971.

RESPONSE TO 2.0d

Personnel responsible for Fire Brigade are qualified by experience and/or training.

FIRE BRIGADE TRAINING

RESPONSE TO 1.0

All items under this section are covered in classroom instruction with the following exception:

d. In lieu of regular planned meetings, quarterly written critiques of monthly fire drills are read and signed by each Brigade member and requalification training is conducted every two years.

RESPONSE TO 2.0

Practice sessions are conducted every two years in initial and requalification training. During these sessions Brigade members extinguish actual fires using the type of equipment available in the plant.

Respiratory training will be given in accordance with NUREG-0041 which is required by Regulatory Guide 8.15.

RESPONSE TO 3.0

Fire drills are conducted in accordance with items in this section with the following exceptions:

(1) Each fire brigade participates in at least two drills per year.

(2) Written critiques of these drills are read and initialed by each brigade member.

RESPONSE TO 4.0

Records are maintained as described in Item 4.0.

CONTROL OF COMBUSTIBLES

RESPONSE TO ATTACHMENT 3

The following Station Directives provide administrative controls of combustibles in areas containing safety-related equipment:

3.11.1 Procedure to Control Combustible Materials and Ignition Sources In Cable Spreading Rooms and Equipment Rooms

3.11.4 Cleanness Levels in Safety Related Areas

3.11.5 Permanent and Transient Storage of Combustible Material

5.1.4 Welding and Burning Safety Procedure

5.1.8 Storage of Material In Safety Related Structures or Systems

5.1.9 Wood Control In The Protected Area

It is felt that these Station Directives assure that the items mentioned in Attachment 3 are controlled such that a high degree of protection from fire is afforded.

CONTROL OF IGNITION SOURCES

RESPONSE TO 1.0

The following Station Directives provide administrative controls of ignition sources in areas containing safety-related equipment:

3.11.1 Procedure to Control Combustible Materials and Ignition Sources In Cable Spreading Rooms and Equipment Rooms

3.11.5 Permanent and Transient Storage of Combustible Materials

5.1.4 Welding and Burning Safety Procedure

5.1.8 Storage of Material In Safety Related Structures or Systems

RESPONSE TO 2.0

All items in this section are controlled under Station Directives listed above with the exception of:

b(4) Oxyacetylene equipment leak testing.

c. Signature concurrence of a second party when a fire watch is not required.

These two items will be added to appropriate directives by April 1, 1978.

RESPONSE TO 3.0

Leak testing is performed using commercially available aerosol or bubble techniques under procedures approved by group heads. The only areas in which candles or open flames are permitted are in the search for secondary system condenser vacuum leaks. In this case candles are considered acceptable since the areas are sufficiently removed from safety related equipment and ignition hazards are minimized.

RESPONSE TO 4.0

Areas containing flammable or potentially explosive atmospheres have been posted to restrict smoking, burning, or welding. Areas containing safety related equipment have been administratively designated and will be physically marked.

FIRE FIGHTING PROCEDURES

RESPONSE TO ATTACHMENT 5

Station Directive 5.3.1 Fire Brigade Organization and Training describes the fire brigade organization, lists qualified fire brigade members, basically outlines the training they will be given and gives the procedure to be followed before conducting a fire drill. This procedure also describes the actions to be taken by personnel who discover a fire and the control room operator actions after a fire has been reported. Additionally, general station personnel are given yearly training on reporting fires, the use of portable extinguishers, and other actions they are expected to take if they discover a fire.

It is our policy that offsite fire departments will not be called except for those fires which may occur outside the protected area fence such as woods and grass fires. However, the Keowee-Ebenezer Fire Department volunteers are trained yearly in basic radiation principles.

In lieu of the fire fighting procedures described in Section d, general arrangement drawings of all levels within the station and yard areas have been marked showing the location of fire protection equipment and the location of some combustibles. These drawings are located in each control room and in the Safety Supervisor's office. We intend to expand the information on these drawings to indicate additional combustibles hazards and ventilation systems supplying each location. It is our opinion that this method makes necessary information available in a broader and much more readily retrievable manner than the use of plans for individual areas or zones.

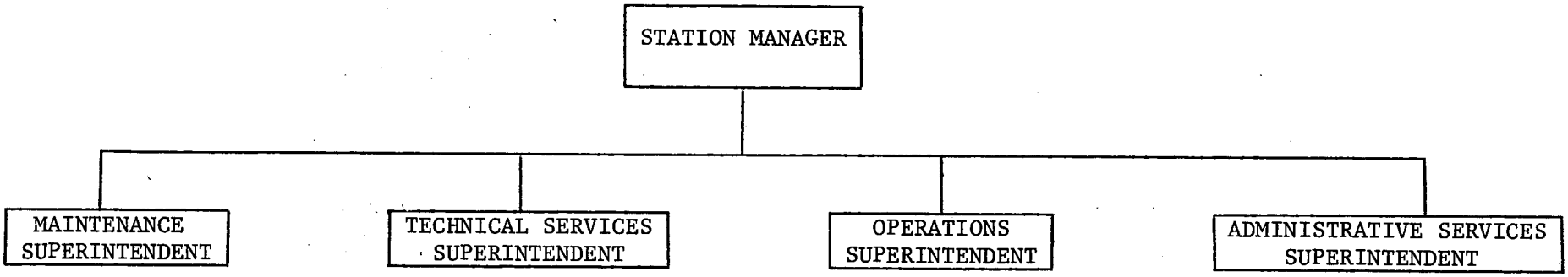
QUALITY ASSURANCE

RESPONSE TO ATTACHMENT 6

The quality assurance program identified in Section 17.2 of Topical Report DUKE-1-A, "Quality Assurance Protection", for nuclear safety-related structures, systems and components was implemented for the fire protection program as of January 1, 1978.

ENCLOSURE 1

OCONEE NUCLEAR STATION
FIRE PROTECTION RESPONSIBILITIES



MAINTENANCE SUPERINTENDENT	TECHNICAL SERVICES SUPERINTENDENT	OPERATIONS SUPERINTENDENT	ADMINISTRATIVE SERVICES SUPERINTENDENT
Repair and perform periodic tests on various equipment	Provide Health Physics coverage for fires with radiological involvement	Responsible for all plant conditions	Develop and implement fire protection policies and procedures
Identify activities that will violate fire stops or create transient fire loads	Performs Performance Testing	Perform operational tests on various equipment	Audit compliance with various procedures, performance of tests, and availability of systems
Proper storage of combustibles			Provide Fire Brigade Training and documentation
Procurement and use of fire retardant lumber			Conduct and critique fire drills
Total preventive maintenance program			Responsible for general housekeeping
Provide approx. 4 Fire Brigade Members	Provide approx. 7 Fire Brigade Members	Provide approx. 100 Fire Brigade Members from operating shifts	Provide approx. 50 Fire Brigade Members from Guard Force