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JOHNSON,A.R. Project Directorate I-3

SUBJECT: Submits results of evaluation to demonstrate & document that fire damper in duct penetration RR-113-P unnecessary.Active suppression &/or detection exists in all areas which contain safety-related equipment.

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July 1, 1991

U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Allen R. Johnson
Project Directorate I-3
Washington, D.C. 20555

Subject: Fire Protection Evaluation for Justification of the Absence of a Fire Damper in Duct Penetration #RR-113-P
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Johnson:

LER 90-011 was previously submitted to identify a ventilation duct penetration that lacked a fire damper. A Design Analysis and Safety Analysis were performed as part of an evaluation to determine the need for a fire damper based on compliance with Appendix A to BTP-APCSB 9.5-1, Appendix R to 10CFR 50 and our licensing basis.

The results of the evaluation demonstrate and document that a damper is not required for the following reasons:

a. Under Appendix R compliance the control building complex was considered as one fire area and consists of a total of three fire zones; the basement level consisting of the Air Handling Room; the middle floor consisting of the Relay Room and the Mux Room; and the upper level consisting of the Control Room. This penetration was located in an internal partition wall, separating the Control Room stairwell and the Relay Room.

b. The installation of a fire damper would provide no benefit from a safe shutdown standpoint.

c. The probability of a fire originating in the Relay Room or Mux Room and traveling downward is considered negligible due to the inherent upward tendency of fire propagation and substantial floor construction separating the Relay Room from the Air Handling Room.

d. The probability of a fire spreading from the Air Handling Room up the stairwell to the Relay Room is also considered low due to several factors such as automatic fire detection and

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suppression, fire retardant cable coatings, and the use of IEEE 383 approved cable.

e. Active suppression and/or detection exists in all areas which contain safety related equipment which could be potentially affected.

f. The stairwell area is not a safety related area and significant sources of combustibles are not present within the area. Therefore, the lack of a damper in this penetration is outside the bases in the Technical Specifications (3.14.6).

RG&E's commitment in LER 90-011 (07/19/90) to install a damper in penetration #RR-113-P was made based upon our conclusion at that time that the lack of a damper was a violation of the Technical Specifications. Our analyses concluded that this is not the case and that the lack of a fire damper does not decrease the level of fire protection. Consequently, our Engineering Work Request (EWR 4882) has been modified to delete the requirement to install a damper at this penetration. This information modifies that which is noted in NRC Inspection Report 91-02, para. 3.4 dated February 14, 1991, which states that a damper is scheduled to be installed in 1992.

Very truly yours,

Robert C. Mecredy

GAL/156
Attachment

xc: Mr. Allen R. Johnson (Mail Stop 14D1)
Project Directorate I-3
Washington, D.C. 20555

U.S. Nuclear Regulatory Commission
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Ginna Senior Resident Inspector