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SUBJECT: Responds to notice of violation dtd 900201 re fire protection issues.

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April 19, 1990  
Docket No. 50-397  
G02-90-79

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
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Gentlemen:

Subject: RESPONSE TO FIRE PROTECTION ISSUES

Reference: Letter, J.B. Martin (NRC) to D.W. Mazur (Supply System), Notice of Violation, dated February 1, 1990.

The reference letter contained a Notice of Violation (Level II, Supplement I) related to the fire protection program for WNP-2. This violation, based on inspections performed during the period from 1986 through 1989, did not require a response from the Supply System and no civil penalty was proposed "because of the apparent lack of clarity which existed regarding some of the fire protection requirements, the age of the violations and because (the Supply System had) implemented extensive corrective actions to preclude recurrence of similar violations."

The Supply System acknowledges the fact that violation of NRC regulations and the Supply System's own fire protection program occurred. Because of the significant implication of a Level II violation, we do feel that some clarification is needed in order to place these issues in proper perspective.

The purpose of this letter is to specifically respond to your request of the reference letter to discuss measures implemented to "provide continuing assurance that similar programmatic deficiency will not recur" and to provide our perspective regarding the safety significance of this violation. We are not requesting a reevaluation of the conclusions of your Notice of Violation or any further action on the part of the NRC staff as a result of this submittal.

In prior correspondence and discussions with NRC staff we have described in detail our actions to prevent recurrence of similar programmatic problems. These include:

- major hardware changes implemented such as added thermal lagging and enhanced separation of safe shutdown circuits;

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- use of an independent consultant to review the fire protection program;
- upgrading of the fire protection documentation;
- reanalysis by our Engineering staff of the Appendix R analysis that was originally performed by Burns and Roe;
- changes to the design control process that provide for review of each proposed plant design change to assure that Appendix R and other fire prevention and protection considerations are properly addressed; and
- addition of a full time fire protection marshal

The addition of the fire protection marshal has been particularly effective in providing oversight of our fire protection program in that his activities include:

- the ability to terminate work activities that do not meet fire protection requirements;
- periodic review of Maintenance Work Requests for fire protection requirements;
- ensuring that appropriate compensatory measures are taken when fire barrier or penetration seal is violated;
- reviewing fire protection maintenance; and
- periodic plant tours to ensure that Fire Protection Program Implementation is being conducted in accordance with approved procedures

The fire marshal's activities are part of the Supply System program to maintain aggressive problem identification, corrective action, and quality oversight programs which are designed to detect future problems if they develop. While we expect to continue our efforts to improve our program and performance in the fire protection area, we believe that past corrective actions in this area provide a reasonable level of assurance that problems of similar magnitude and significance to those detected just prior to and in the early period of WNP-2 operation will not recur.



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The Level II violation described in Section I of the Notice of Violation related primarily to the following issues:

- failure to provide adequate protection to enable operation of one train of safe shutdown equipment
- failure to provide alternate or dedicated safe shutdown capability

While the Supply System acknowledges the validity of this violation, we believe it is appropriate to clarify the record with regard to our assessment of the safety significance of this matter. We do not believe that the programmatic or hardware deficiency resulted in operation of WNP-2 at an unacceptable level of risk due to fire. The initial safe shutdown circuit separation and thermal lagging issues were identified by the Supply System and reported to the NRC by Licensee Event Report 84-031 issued May 10, 1984, and subsequent problems surfaced as a result of ongoing reviews of this major fire protection enhancement effort. As new problems surfaced, adequacy of our design to support continued operation was assessed and in many cases special provisions such as increased fire watch tours and controls of combustibles were implemented until more permanent improvements could be implemented.

As discussed in the Notice of Violation (NOV), the concern was not that fire barriers were not present, but that in the event of a design basis fire, the protection may not have been adequate to meet the design basis. Of significance in this regard is the fact that none of the fire areas at WNP-2 contain actual combustible loads which would result in a three-hour fire. The actual combustible loading in areas designated as three-hour fire areas would result in a fire of much less than a three-hour duration. Since Appendix R requires only a single train of safe shutdown equipment be shown to be available, analysis of redundant equipment availability for all fire areas was not performed. However, at WNP-2 redundant safe shutdown equipment typically is spatially separated. Therefore, it is our assessment that for the maximum fire that could realistically be postulated, safe shutdown would have been achieved despite the identified concerns.

As was noted in the NOV, the Supply System initiated prompt and extensive corrective action upon discovery of the subject deficiencies. The issues covered in the NOV were identified, reported to the NRC in accordance with regulations, and in each case evaluated to be of a significance level that would not prevent continued safe operation of our facility.

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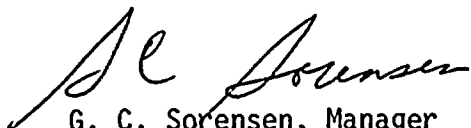
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Should you have any questions, please feel free to contact me.

Very truly yours,

A handwritten signature in cursive script, appearing to read "G. C. Sorensen".

G. C. Sorensen, Manager  
Regulatory Programs (MD 280)

GCS/tlr

cc: Mr. J. B. Martin, Region V NRC  
Mr. N. S. Reynolds, Bishop, Cook, Purcell & Reynolds  
Mr. R. B. Samworth, NRC  
Mr. D. L. Williams, BPA (399)