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 ZIMMERSON, S. R. Carolina Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H. R. Office of Nuclear Reactor Regulation, Director (post 851125)

SUBJECT: Forwards addl deviation to Branch Technical Position 9.5-1
 on NUREG-0800 re fire protection, per discussions at B60430
 meeting w/NRC.

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Carolina Power & Light Company

JUN 18 1986

SERIAL: NLS-86-219

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Washington, DC 20555

SHEARON HARRIS NUCLEAR POWER PLANT
UNIT NO. 1 - DOCKET NO. 50-400
FIRE PROTECTION - DEVIATIONS FROM BTP 9.5-1

Dear Mr. Denton:

Carolina Power & Light Company hereby submits additional deviations to the Branch Technical Position 9.5-1 to NUREG-0800. Attachment 1 provides the technical information needed for your review. The deviations were discussed with your staff at an April 30, 1986, meeting.

Should you have any questions concerning this letter, please contact Mr. Patrick Carier at (919) 836-8165.

Yours very truly,

S. R. Zimmerman
Manager

Nuclear Licensing Section

SRZ/PPC/mmh

Attachment

cc: Mr. B. C. Buckley (NRC) (W/A)	Mr. John D. Runkle
Mr. G. F. Maxwell (NRC-SHNPP)	Dr. Richard D. Wilson
Dr. J. Nelson Grace (NRC-RII)	Mr. G. O. Bright (ASLB)
Mr. Travis Payne (KUDZU)	Dr. J. H. Carpenter (ASLB)
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FIRE PROTECTION ADDITIONAL DEVIATIONS

SUMMARY

A deviation has been identified from BTP-9.5-1, Section C.5.a (1, 2, 4 and 5) of NUREG-0800 from having fire-rated dampers, doors, and penetration seals in walls and floors designated as 3-hour rated.

AREA DESCRIPTION

See Tables 1, 2, and 3 for area description.

DISCUSSION

Tables 1, 2 and 3 identify the location of the doors, HVAC and bus duct penetrations. For those penetrations and doors where safe shutdown equipment is within 20 feet, automatic suppression and detection has been provided on at least one side of the door or penetration. The combustible loading in the areas are considered low to moderate. The doors are manufactured to the same engineering specification as would a 3-hour rated door. The SSA equipment identified within 20 feet radius of the doors or penetrations do not have their redundant counterpart within 20 feet except for MCC-1A-35SA and MCC-1B-35SB (deviation previously identified in NLS-86-040, dated February 13, 1986).

CONCLUSION

CP&L believes that this deviation is justified for the following:

1. Low to moderate combustible loading in the zone.
2. Suppression and detection systems are provided on at least one side of the door or penetration.
3. The SSA equipment identified within 20 feet radius of the doors or penetrations do not have their redundant counterpart within 20 feet except as noted above.

Based on the fire prevention features provided, CP&L concluded that the addition of fire dampers and rated doors would not greatly enhance the fire protection in the these zones and provides an acceptable deviation to NUREG-0800, Section C.5.1 (1, 2, 4, and 5).

SUMMARY

A deviation has been identified from BTP-9.5-1, Section C.5.b(2) NUREG-0800 from having to consider intervening combustibles between the following: 1) the power and control cable feeding the CCW 1A-SA pump, and 2) the CCW 1B-SB pump and related cables.

AREA DESCRIPTION

Plant Location: Reactor Auxiliary Building Elevation 236 feet

Fire Area: 1-A-BAL

SSA Area: FAABL3

Fire Zone: 1-A-3-PB

Other Safe Shutdown Equipment in the SSA Area:

1. Air Handler AH-29
2. Motor Control Centers 1B22SB and 1A22SA
3. SW Booster Pumps
4. Air Handler AH-9
5. Air Handler AH-6 (Local)
6. Air Handler AH-7 (Local)
7. RHR Heat Exchangers
8. CCW Heat Exchangers
9. CCW Pumps
10. CVCS Charging Pumps
11. Air Handler AH-10
12. Air Handler AH-11 (Local)
13. Auxiliary Feedwater Pumps

DISCUSSION

The power and control cable is routed in conduit from CCW 1A-SA to cable tray raceway which is approximately 100 feet from the CCW 1B-SB pump and related cable.

Intervening combustibles are present between these components in the form of IEEE-383 cables located in cable trays approximately 8 feet away (see Figure 1). The location is provided with an automatic suppression system actuated by thermal detection. Ionization detectors are also provided in this location for fire detection. This zone has low combustible loading as described in the SHNPP fire hazard analysis, Section 9.5A.3, Page 9.5A-29. Additional information for this area is available in licensee submittal NLS-84-245, dated June 12, 1984.

CONCLUSION

CP&L believes that this deviation is justified for the following reasons:

1. Low combustible loading in the area.
2. Suppression and detection systems are provided in the area.

3. Physically separated by approximately 100 feet.

Based on the fire prevention features provided, CP&L concluded that further consideration of intervening combustibles would not greatly enhance fire protection in this zone and provides an acceptable deviation to NUREG-0800, Section C.5.b(2).

THE
FEDERAL BUREAU OF INVESTIGATION
UNITED STATES DEPARTMENT OF JUSTICE
WASHINGTON, D. C. 20535

TABLE 1

FIRE DOOR DEVIATION

DOOR NO.	FSAR FIGURE (ATTACHED)	SSA SK	INT/EXT DOOR	FIRE ZONE	AUTOMATIC PROTECTION	COMBUSTIBLE LOADING	SSA EQUIPMENT
D9	9.5A-8	S013	INT	1-A34-RHXA	NONE	15,495	RHR Heat Exchanger 1A-SA
	9.5A-8			1-A-4-CHLR	M,T&I	155,296	NONE
D14	9.5A-8	S013	INT	1-A-34-RHXA	NONE	NEGLIGIBLE	NONE
	9.5A-8			1-A-4-CHLR	M,T&I	155,296	NONE
D54	9.5A-8	S014	INT	1-A-4-COME	M,I,T	38,989	MCC-1A35-SA
	9.5A-8			1-A-4-CHFA	I	67,917	NONE

TABLE 2

FIRE DAMPER DEVIATION

FLOOR ELEVATION		+261'-0		(SEE ATTACHED FIGURE 9.5A-8)					
HVAC DUCT PENETRATION I.D. NO.:	DUCT SIZE(IN) HVAC DWG CAR-2168	HVAC DUCT CATEGORY	HVAC SYSTEM		FIRE ZONE	FIRE ZONE COMBUSTIBLE LOADING (BTU/SF)	DETECTION SUPPRESSION	DUCTWORK GUAGE ISOLATION VALVE	SAFE SHUTDOWN EQUIPMENT (20' RAD)
FD-W-1	40x46 BOT. EL. 275'-10 G-805 Rev 4	NNS	E-17(1X-NNS) E-18(1X-NNS) E-19(1X-NNS) E-20(1X-NNS)	E	1-A-BAL 1-A-4-COME	38,514	I,T M(T)	16 No	MCC-1A35-SA
				WEST	1-A-BAL 1-A-4-CHFA	114,699	I None	16 No	None
FD-W-2	20x14 BOT. EL. 272'-10 G-805 Rev 4	NNS	S-3(1A-NNS) S-3(1B-NNS)	E	1-A-BAL 1-A-4-COME	38,514	I,T M(T)	20 No	MCC-1A35-SA
				WEST	1-A-BAL 1-A-4-COMI	61,392	I,T M(T)	20 No	None
FD-W-3	20x14 BOT. EL. 272'-10 G-805 Rev 4	NNS	S-3(2A-NNS) S-3(2B-NNS)	E	1-A-BAL 1-A-4-COME	38,514	I,T M(T)	20 No	MCC-1A35-SA
				WEST	1-A-BAL 1-A-4-COMI	61,392	I,T M(T)	20 No	None
FD-W-4	30x24 EL. 270'-6 G-505S01	NNS	E-17(1X-NNS) E-18(1X-NNS) E-19(1X-NNS) E-20(1X-NNS)	NO	1-A-BAL 1-A-4-CHLR	155,296	I,T M(T)	Transfer Grill No	None
				SOUT	1-A-BAL 1-A-4-TA	Negligible	Manual Alarm Sta. None	Transfer Grill No	None

TABLE 2

FIRE DAMPER DEVIATION

FLOOR ELEVATION +261'-0 (SEE ATTACHED FIGURE 9.5A-8)									
HVAC DUCT PENETRATION I.D. NO.:	DUCT SIZE(IN) HVAC DWG CAR-2168	HVAC DUCT CATEGORY	HVAC SYSTEM	X	FIRE ZONE	FIRE ZONE COMBUSTIBLE LOADING (BTU/SF)	DETECTION SUPPRESSION	DUCTWORK GUAGE ISOLATION VALVE	SAFE SHUTDOWN EQUIPMENT (20' RAD)
FD-W-5	30x26 BOT. EL. 279'-2 G-505S01 Rev 6	NNS	E-17(1X-NNS) E-18(1X-NNS) E-19(1X-NNS) E-20(1X-NNS)	N	1-A-BAL 1-A-4-CHLR.	155,296	I, T	16	Chilled Water Pump P-4 (1A-SA) Closed Expansion Tank 1A-SA
				O			M(T)	No	
				R	1-A-BAL 1-A-4-TA	Negligible	Manual Alarm Sta.	16	Condensate Storage Tank 1X-SAB
				T			None	No	
FD-W-6	10x6 BOT. EL. 268'-3 G-505S01 Rev. 6	SAFETY	E-6(1A-SA)	H	1-A-BAL 1-A-34-RHXA	15,495	None	18	RHR Heat Exchanger 1A-SA
				N			None	No	
				S	1-A-BAL 1-A-4-CHLR	155,296	I, T	18	None
				U			M(T)	Yes	
FD-W-7	10x6 BOT. EL. 268'-3 G-505S01 Rev. 6	SAFETY	E-6(1A-SA)	H	1-A-BAL 1-A-34-RHXA	15,495	None	18	RHR Heat Exchanger 1A-SA
				N			None	No	
				S	1-A-BAL 1-A-4-CHLR	155,296	I, T	18	None
				U			M(T)	Yes	
FD-W-8	10x6 BOT. EL. 268'-4 G-505S01 Rev. 6	SAFETY	E-6(1B-SB)	H	1-A-BAL 1-A-4-CHLR	155,296	I, T	18	None
				N			M(T)	Yes	
				S	1-A-BAL 1-A-34-RHXB	Negligible	None	18	RHR Heat Exchanger 1B-SB
				U			None	No	

TABLE 2

FIRE DAMPER DEVIATION

FLOOR ELEVATION		+261'-0		(SEE ATTACHED FIGURE 9.5A-8)					
HVAC DUCT PENETRATION I.D. NO.:	DUCT SIZE (IN) HVAC DWG CAR-2166	HVAC DUCT CATEGORY	HVAC SYSTEM	<div>X</div>	FIRE ZONE	FIRE ZONE COMBUSTIBLE LOADING (BTU/SF)	DETECTION SUPPRESSION	DUCTWORK GAP ISOLATION VALVE	SAFE SHUTDOWN EQUIPMENT (20' RAD)
FD-W-9	10x6 BOT. EL. 274'-5	SAFETY	E-6(1B-SB)	N O R T H	1-A-BAL 1-A-4-CHLR	155,296	I, T	18	None
							M(T)	Yes	
				S O U T H	1-A-BAL 1-A-34-RHXB	Negligible	None	18	RHR Heat Exchanger 1B-SB
	G-505S01 Rev 6						None	No	

TABLE 2

FIRE DAMPER DEVIATION

FLOOR ELEVATION (SEE ATTACHED FIGURES 9.5A-9, 9.5A-15, 9.5B-1)									
HVAC DUCT PENETRATION I.D. NO.:	DUCT SIZE(IN) HVAC DWG CAN-2168	HVAC DUCT CATEGORY	HVAC SYSTEM		FIRE ZONE	FIRE ZONE COMBUSTIBLE LOADING (BTU/SF)	DETECTION SUPPRESSION	DUCTWORK GUAGE ISOLATION VALVE	SAFE SHUTDOWN EQUIPMENT (20' RAD)
FD-W-10	60x24 BOT. EL. 328'-8" G-502503	SAFETY	AH-56 AH-57	ABOVE	12-A-7-1HV	15,440	I ----- NONE	16 ----- YES	NONE
				BELOW	5-F-4-BAL	INSIGNIFICANT FHA 9.5A.14	NONE ----- NONE	16 ----- NO	NONE
FD-W-11	100x26 BOT. EL. 328'-8" G-501502	SAFETY	E-23 E-24	ABOVE	12-A-7-1HV	15,440	I ----- NONE	16 ----- YES	NONE
				BELOW	5-F-4-BAL	INSIGNIFICANT FHA 9.5A.14	NONE ----- NONE	16 ----- NO	NONE
FD-W-12	100x26 BOT. EL. 328'-8" 5G-501502	SAFETY	E-25 E-26	ABOVE	12-A-7-1HV	15,440	I ----- NONE	16 ----- YES	NONE
				BELOW	5-F-4-BAL	INSIGNIFICANT FHA 9.5A.14	NONE ----- NONE	16 ----- NO	NONE
FD-W-13	52x24 BOT. EL. 328'-8" 5-G-502503	SAFETY	AH-58 AH-59	ABOVE	12-A-7-1HV	15,440	I ----- NONE	16 ----- YES	NONE
				BELOW	5-F-4-BAL	INSIGNIFICANT FHA 9.5A.14	NONE ----- NONE	16 ----- NO	NONE

TABLE 2

FIRE DAMPER DEVIATION

FLOOR ELEVATION		(SEE ATTACHED FIGURES 9.5A-9, 9.5A-15, 9.5B-1)							
HVAC DUCT PENETRATION I.D. NO.:	DUCT SIZE(IN HVAC DWG CAN-2168	HVAC DUCT CATEGORY	HVAC SYSTEM	X	FIRE ZONE	FIRE ZONE COMBUSTIBLE LOADING (BTU/SF)	DETECTION SUPPRESSION	DUCTWORK GUAGE ISOLATION VALVE	SAFE SHUTDOWN EQUIPMENT (20' RAD)
FD-73	18x18	NNS	E-11	ABOVE	5-F-3-NF	INSIGNIFICANT FHA 9.5A.14	NONE ----- NONE	16 ----- NO	NONE
				BELOW	5-F-2-DEC	SAME AS ABOVE	I ----- NONE	16 ----- No	NONE
FD-71	60x80 EL.286	NNS	E-17	ABOVE	12-A-5-CHF	82,242	I,T ----- P	16 ----- NO	NONE
				BELOW	1-A-4-CHFA	112,960	I,T ----- M	16 ----- NO	NONE
FD-72	60x80 EL.286	NNS	E-18	ABOVE	12-A-5-CHF	82,242	I,T ----- P	16 ----- NO	NONE
				BELOW	1-A-4-CHFA	112,960	I,T ----- M	16 ----- NO	MCC 1A-35 SA

TABLE 3
BUS DUCT SEAL DEVIATION

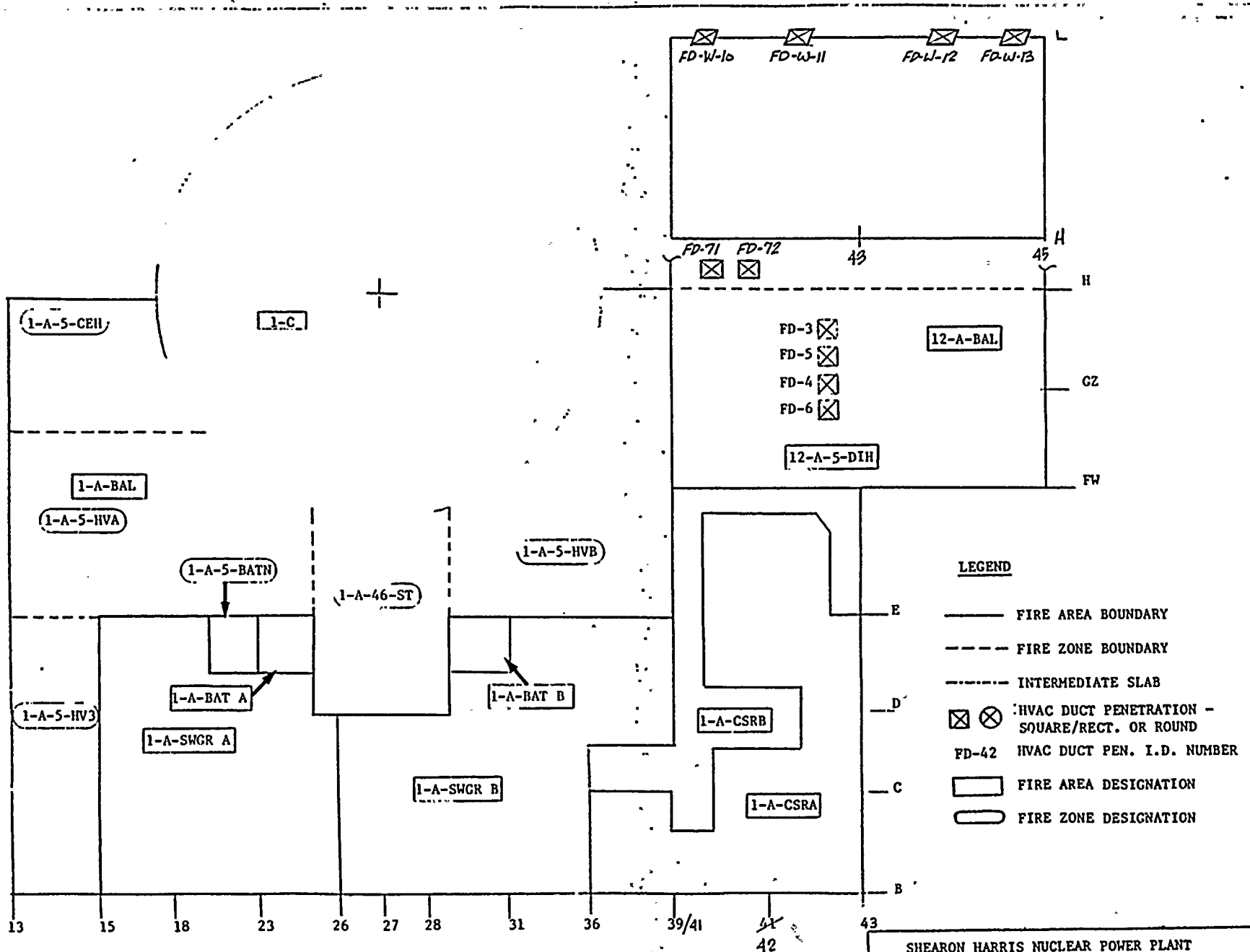
BUS DUCT PENETRATION I.D. No.	DUCT SIZE	SSA SK	FSAR FIG	FIRE ZONE	AUTOMATIC PROTECTION	COMBUSTIBLE LOADING (BTU/SF)	BUS DUCT GUAGE	SSA EQUIPMENT (20' RAD)
BD-1	22x16	S13	9.5A-8	I-A-4-CHLR	M,T,I	152,223		AH-19 IB-SB (LOCAL) AH-19 IA-SA (LOCAL) HVAC CHILLER WC-2 CW CIRC PUMP P-7
		S17	9.5A-9	I-A-SWGR A	I	32,207		480V SWGR IA2-SA
BD-2	22x16	S13	9.5A-8	I-A-4-CHLR	M,T,I	152,223		AH-19 IA-SA (LOCAL) AH-19 IB-SB (LOCAL) HVAC CHILLER WC-2 CW CIRC PUMP P-7
		S17	9.5A-9	I-A-SWGR A	I	32,207		NONE
BD-3	33x12	S13	9.5A-8	I-A-4-CHLR	M,T,I	152,223		AH-19 IA-SA (LOCAL) AH-19 IB-SB (LOCAL) HVAC CHILLER WC-2
		S17	9.5A-9	I-A-SWGR A	I	32,207		6.9KV SWGR IA-SA 480V SWGR IA2-SA 480V SWGR IA3-SA
BD-4	33x12	S13	9.5A-8	I-A-4-CHLR	M,T,I	152,223		AH-19 IA-SA (LOCAL) AH-19 IB-SB (LOCAL)
		S17	9.5A-9	I-A-SWGR A	I	32,207		6.9KV SWGR IA-SA 480V SWGR IA2-SA 480V SWGR IA3-SA
BD-5	33x12	S13	9.5A-8	I-A-4-CHLR	M,T,I	152,223		AH-19 IA-SA (LOCAL) HVAC CHILLER WC-2
		N/A	9.5A-35	EL.261 GND.FL.	M,T	78,478		NONE
BD-6	33x12	S13	9.5A-8	I-A-4-CHLR	M,T,I	152,223		AH-19 IA-SA (LOCAL)
		N/A	9.5A-35	EL.261 GND.FL.	M,T	78,478		NONE

TABLE 3
BUS DUCT SEAL DEVIATION

BUS DUCT PENETRATION I.D. No.	DUCT SIZE	SSA SK	PSAR FIG	FIRE ZONE	AUTOMATIC PROTECTION	COMBUSTIBLE LOADING (BTU/SF)	BUS DUCT GUAGE	SSA EQUIPMENT (20' RAD)
BD-7	33x12	S13	9.5A-8	I-A-4-CHLR	M,T,I	152,223		3AF-F1-SA-1 3AF-F2-SA-1
		S17	9.5A-9	I-A-SWGR A	I	32,207		NONE
BD-8	33x12	S13	9.5A-8	I-A-4-CHLR	M,T,I	152,223		3AF-F1-SA-1 3AF-F2-SA-1
		S17	9.5A-9	I-A-SWGR A	I	32,207		NONE
BD-9	33x12	S13	9.5A-8	I-A-4-CHLR	M,T,I	152,223		3AF-F1-SA-1 3AF-F2-SA-1
		N/A	9.5A-35	EL.261 GND.FL.	M,T	78,478		NONE
BD-10	33x12	S13	9.5A-8	I-A-4-CHLR	M,T,I	152,223		3AF-F1-SA-1 3AF-F2-SA-1
		N/A	9.5A-35	EL.261 GND.FL.	M,T	78,478		NONE
BD-11	33x12	S13	9.5A-8	I-A-4-CHLR	M,T,I	152,223		3AF-F1-SA-1 3AF-F2-SA-1
		N/A	9.5A-35	EL.261 GND.FL.	NONE	78,478		NONE
BD-12	33x12	S13	9.5A-8	I-A-4-CHLR	M,T,I	152,223		3AF-F2-SA-1 3AF-F5-SB-1 3AF-F6-SB-1
		N/A	9.5A-35	EL.261 GND.R.	NONE	78,478		NONE
BD-13	33x12	S13	9.5A-8	I-A-4-CHLR	M,T,I	152,223		3AF-F1-SA-1 3AF-F2-SA-1
		S17	9.5A-9	I-A-SWGR B	I	106,792		ESS SEQ PNL (18-SB) 480V SWGR 1B3-SB
BD-14	33x12	S13	9.5A-8	I-A-4-CHLR	M,T,I	152,223		3AF-F2-SA-1 3AF-F5-SB-1 3AF-F6-SB-1
		S17	9.5A-9	I-A-SWGR B	I	106,792		ESS SEQ PNL (18-SB) 480V SWGR 1B3-SB

TABLE 3
BUS DUCT SEAL DEVIATION

BUS DUCT PENETRATION I.D. No.	DUCT SIZE	SSA SK	FSAR FIG.	FIRE ZONE	AUTOMATIC PROTECTION	COMBUSTIBLE LOADING (BTU/SF)	BUS DUCT GUAGE	SSA EQUIPMENT (20' RAD)
BD-15	33x12	S013	9.5A-8	1-A-4-CHLR	M,T,I	152,223		AH-20 1A-SA (LOCAL) AH-20 1B-SB (LOCAL) 3AF-F5-SB-1 3AF-F6-SB-1
		S017	9.5A-9	1-A-SWGR B	I	106,792		NONE
BD-16	33x12	S13	9.5A-8	1-A-4-CHLR	M,T,I	152,223		AH-20 1A-SA (LOCAL) AH-20 1B-SB (LOCAL) 3AF-F5-SB-1 3AF-F6-SB-1
		S17	9.5A-9	1-A-SWGR B	I	106,792		NONE
BD-17	33x12	S13	9.5A-8	1-A-4-CHLR	M,T,I	152,223		AH-20 1A-SA (LOCAL) AH-20 1B-SB (LOCAL) 3AF-F5-SB-1 3AF-F6-SB-1
		N/A	9.5A-35	EL. 261 GND. FL.	M,T	78,478		NONE
BD-18	33x12	S13	9.5A-8	1-A-4-CHLR	M,T,I	152,223		AH-20 1A-SA (LOCAL) AH-20 1B-SB (LOCAL) 3AF-F5-SB-1 3AF-F6-SB-1
		N/A	9.5A-35	EL. 261 GND. FL.	M,T	78,478		NONE
BD-19	22x16	S13	9.5A-8	1-A-4-CHLR	M,T,I	152,223		AH-20 1A-SA (LOCAL) AH-20 1B-SB (LOCAL) CHILLED WATER PUMP P4 HVAC CHILLER WC-2 COOL. WATER CIRC. PUMP CLOSED EXP. TANK 1B-SB 3SW-VB69 SB-1
		S17	9.5A-9	1-A-SWGR B	I	106,792		480V SWGR 1B2-SB

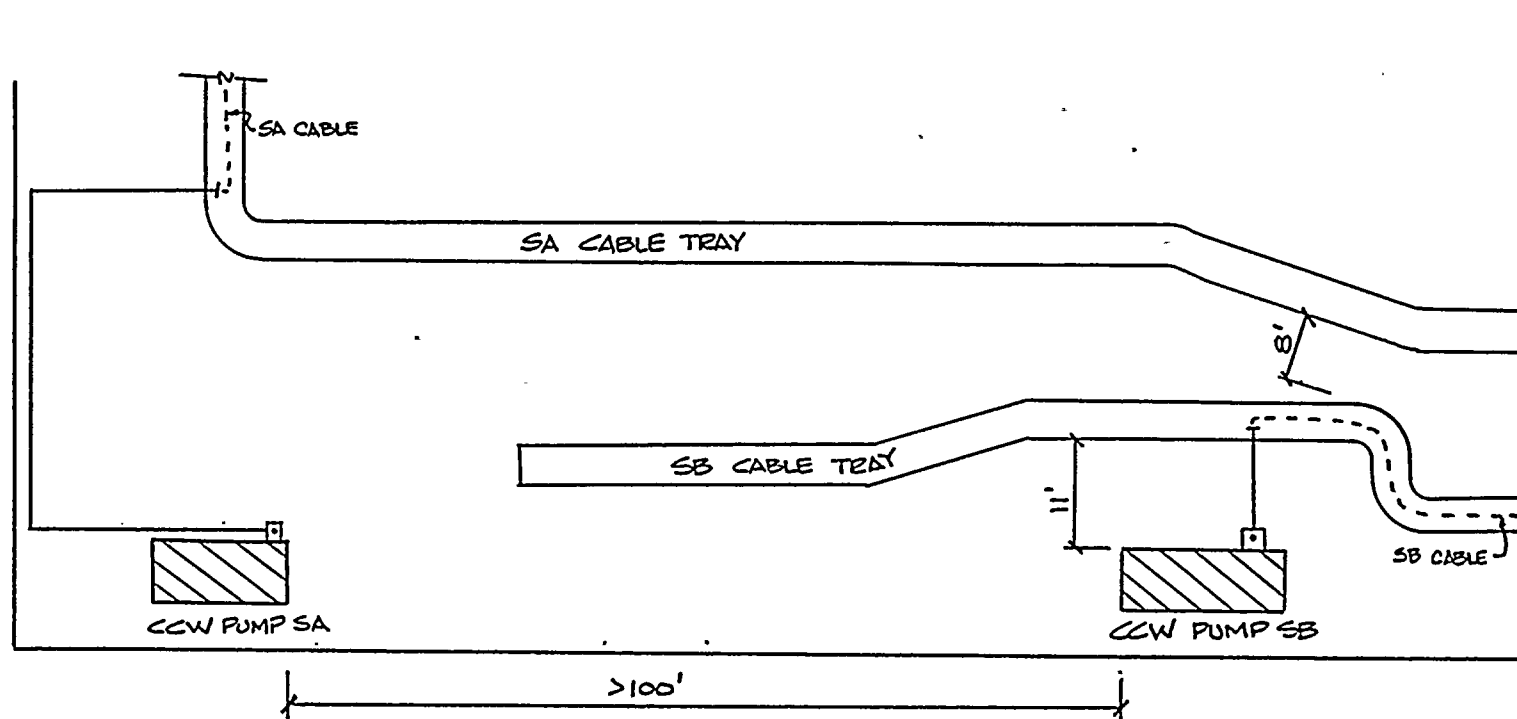


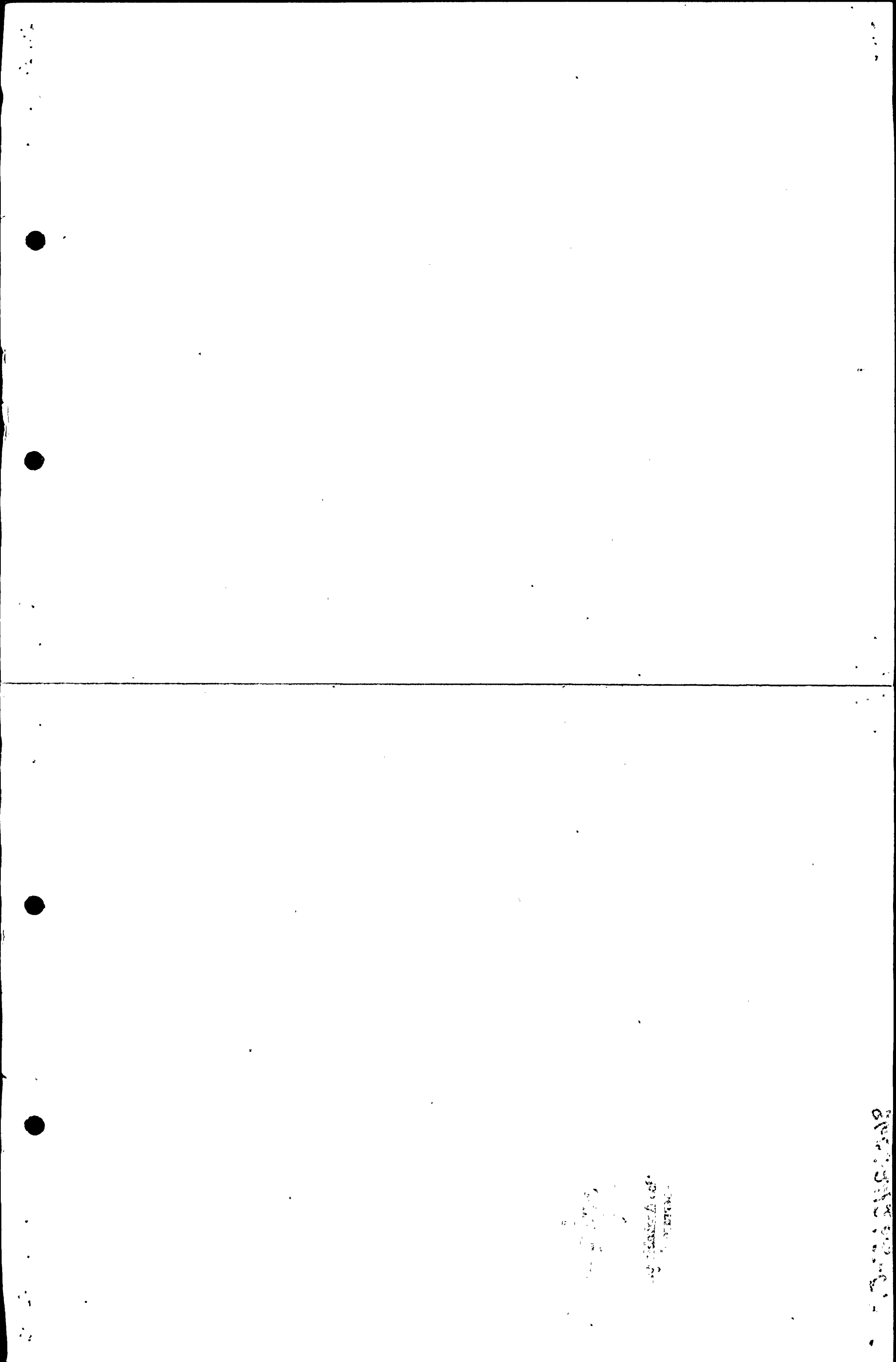
SHEARON HARRIS NUCLEAR POWER PLANT
Carolina Power & Light Company
FIRE DAMPER DEVIATION REQUEST STUDY

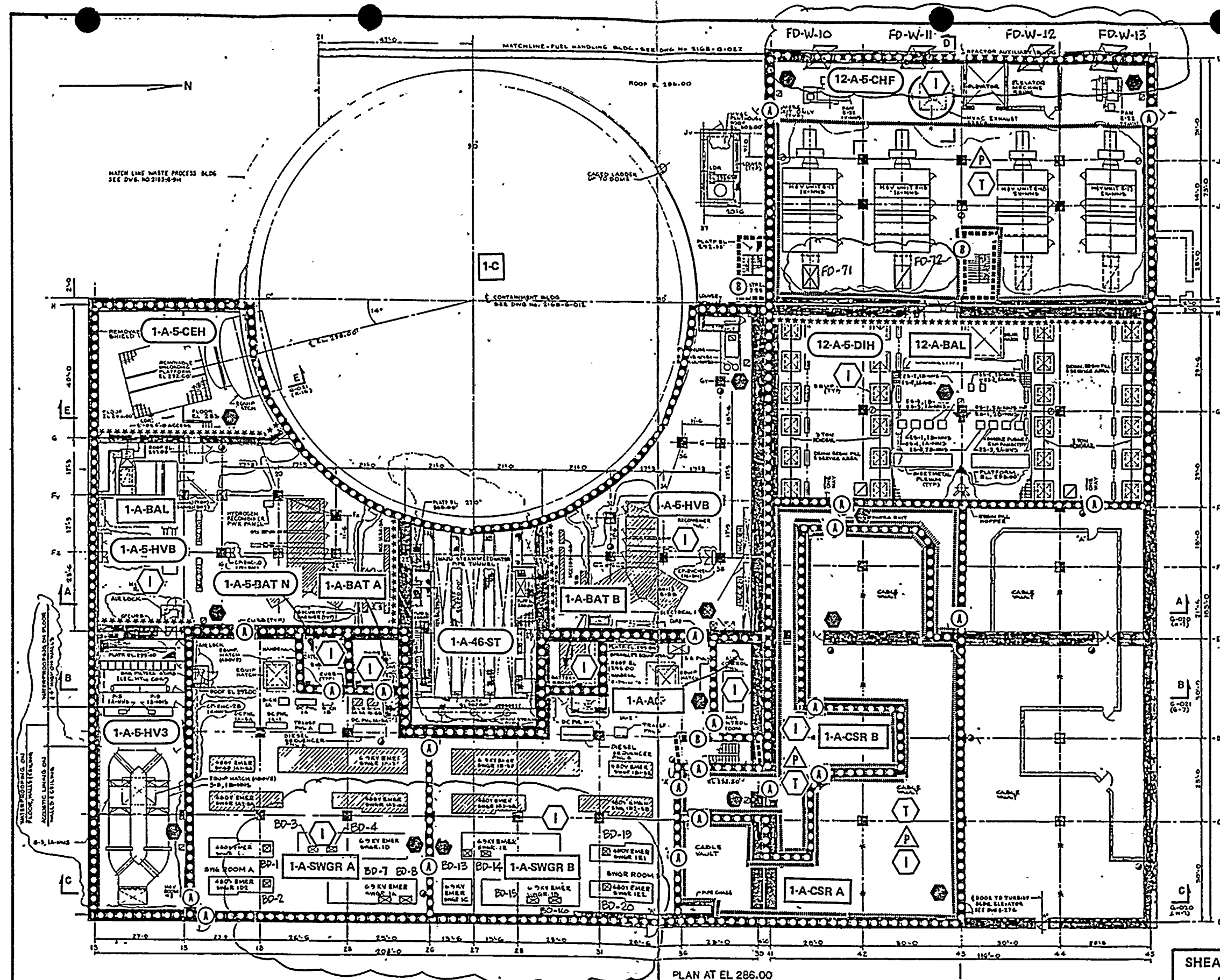
FIRE PROTECTION - REACTOR
AUXILIARY BLDG - PLAN EL. 286.00'
FIGURE 9.5B-1

FIGURE 1

REACTOR AUXILIARY BUILDING
ELEVATION 236
FS&Z FIGURE 9.5A-7







TI
APERTURE
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Also Available On
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AMENDMENT NO. 15

SHEARON HARRIS NUCLEAR POWER PLANT
Carolina Power & Light Company
FINAL SAFETY ANALYSIS REPORT

FIRE PROTECTION - REACTOR
AUXILIARY BLDG - PLAN EL 286.00'

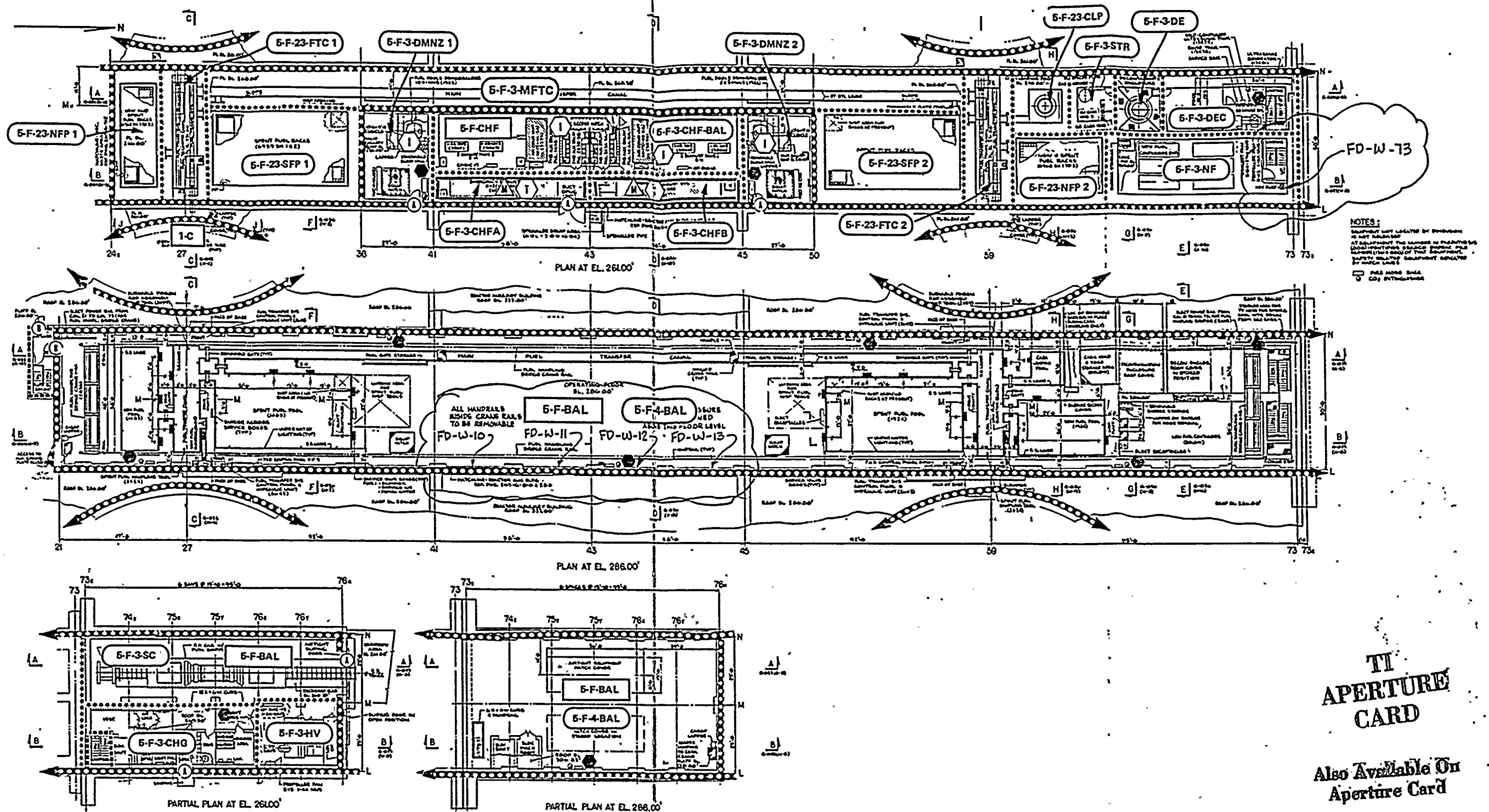
FIGURE 9.5A-9

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AMENDMENT NO. 15

SHEARON HARRIS NUCLEAR POWER PLANT
 Carolina Power & Light Company
 FINAL SAFETY ANALYSIS REPORT

FIRE PROTECTION—FUEL HANDLING
 BUILDING—PLANS—SHEET 2

FIGURE 9.5A-15

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