



Jersey Central Power & Light Company
Madison Avenue at Punch Bowl Road
Morristown, New Jersey 07960
(201) 455-8200

October 12, 1979

Director
Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Sir:

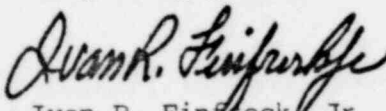
Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Fire Protection - Request for SER Supplement

Amendment No. 29 to Operating License No. DPR-16 requires that certain modifications be made to the Oyster Creek Nuclear Plant for fire protection purposes. These modifications are described in the associated Fire Protection Safety Evaluation Report (SER) forwarded with Amendment 29 which states, in part, that the modifications are to be accomplished in accordance with the schedule presented in Table 3.1 of the SER.

Since the Oyster Creek refueling outage has been re-scheduled for January, 1980 in order to allow for more efficient utilization of the nuclear fuel, we are requesting a delay in implementation of certain fire protection modifications which require, for safety reasons, that the plant be in a shutdown condition during installation. The requested changes to Table 3.1 of the SER and a discussion of these changes is presented in Enclosure 1.

We have concluded that a delay in the implementation of the modifications discussed in Enclosure 1 will not adversely affect the health and safety of the public since all other modifications have been completed or will be in accordance with the SER existing and supplements thereto.

Very truly yours,


Ivan R. Finfrock Jr.
Vice President

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Enclosures

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TABLE 3.1

IMPLEMENTATION DATES FOR LICENSE
PROPOSED MODIFICATIONS

<u>Item</u>		<u>Date</u>
3.1.1	Fire Barriers	December 1979+
3.1.2	Fire Barrier Penetrations	December 1979++
3.1.3	Dampers	January 1980
3.1.4	Fire Detectors	December 1979+++
3.1.5	Halon Suppression Systems	December 1979++++
3.1.6	Water Spray Systems	December 1979
3.1.7	Sprinkler Systems	September 15, 1979***
3.1.8	Carbon Dioxide Suppression System	February 1980
3.1.9	Hose Stations	September 15, 1979
3.1.10	Aqueous Film Forming Foam	Completed
3.1.11	Portable Extinguishers	Completed
3.1.12	Emergency Breathing Apparatus	Completed
3.1.13	Removal of Combustible Material	Completed
3.1.14	Transformer Dike	December 1979
3.1.15	Diesel Generator Fuel Oil Line	January 1980
3.1.16	Ventilation System Changes	December 1979
3.1.17	Loss of Ventilation Alarm-Battery Room	Completed
3.1.18	Suppression System Valve Control	Completed
3.1.19	Portable Smoke Removal Equipment	Completed
3.1.20	Alternate Water Supply to the Yard Loop	July 1980
3.1.21	Protection From Water Damage	December 1979
3.1.22	New Battery Room and Rerouting Battery Cables	Completed
3.1.23	Remote Shutdown Station	**

**Schedule dependent on equipment availability (not to exceed end of 1980 refueling outage)

***Except for the system extensions in the turbine building condenser bay which shall be completed during the next refueling outage.

+ Except for the 4160 switchgear vault which shall be completed during the next refueling outage.

++Except for the doors to the steam tunnel which shall be installed during the next refueling outage.

+++Except those in the area of instrument racks RK01, RK02, and RK03 and in the control room which shall be completed during the next refueling outage.

++++Except the system in the control room panels which shall be installed during the next refueling outage.

DISCUSSION

SER Item 3.1.1 Fire Barriers, and; SER Item 3.1.8 Carbon Dioxide Suppression System

All proposed fire barrier modifications will be installed by December, 1979, with the exception of the 4160 volt switchgear vaults. It is felt that the vault and associated CO₂ system should be installed during a shutdown condition since it involves heavy construction work in the area of the emergency switchgear units 1C and 1D which are extremely important to plant safety equipment. Since the proposed detection system for the 4160 volt area will be operational by the December date, operators will have early warning of a fire condition and can take appropriate measures to control the fire in an expeditious manner.

SER Item 3.1.2 Fire Barrier Penetrations

All fire barrier penetration modifications will be completed by the December, 1979 date, with the exception of the uprating of the steam tunnel doors which are located in the condenser bay. Installation of these doors during operation would expose the installers to high levels of radiation. Installation during a shutdown condition will reduce this exposure to significantly low levels. A fire occurring in this area would not impede the safe shutdown of the plant. It is therefore concluded that a delay in the installation of these doors in order to reduce radiation exposure to workers is consistent with ALARA objectives.

SER Item 3.1.3 Dampers

All damper modifications will be completed by December, 1979, with the exception of those associated with the 4160 switchgear vault and the control/cable spread room systems. Dampers for the 4160 volt switchgear vault will be accomplished in conjunction with the vault installation. The control/cable spread room ventilation system will be significantly upgraded during the upcoming refueling outage. The proposed water spray and detection system for the cable spread room will be completed by December, 1979, and the Control Room is a continuously manned area which provides a high level of protection for these areas.

SER Item 3.1.4 Fire Detectors

The proposed fire detection system will be completed by the December, 1979 date, with the exception of those detectors in the area of three instrument racks (RKO 1, RKO 2, and RKO3) and the control room. The detectors for the control room will be installed in conjunction with the proposed halon system discussed below. The installation of detectors in the area of RKO 1 and RKO 2 involves the erection of scaffolding in close proximity to the instrument racks jeopardizing safety related instrumentation. In the event of a fire other detectors in adjacent areas will alert operating personnel of a fire condition.

SER Item 3.1.5 Halon Systems

All of the proposed halon systems will be completed by December, 1979

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with the exception of the system for the control room panels. The installation of this system requires piping and detector installations within safety related panels where the working area is constricted; therefore, these installations must be accomplished while the plant is in a shutdown condition. Should a fire occur, it would be detected by operating personnel who have available sufficient extinguishers to limit fire damage to a very small area.

SER Item 3.1.15 Diesel Fuel Oil Line

This modification must be accomplished during plant shutdown since the Technical Specifications require the emergency diesel generators to be operable during plant operation. Should a fire occur, it would be detected by the detection system which will be installed by the December, 1979 date. The Fire Brigade would be dispatched and have hose streams and a manual foam station available for fire suppression.