



**Wisconsin Electric** POWER COMPANY  
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March 18, 1981

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U. S. NUCLEAR REGULATORY COMMISSION  
Washington, D. C. 20555

Dear Mr. Denton:

DOCKET NOS. 50-266 AND 50-301  
STATUS OF FIRE PROTECTION MODIFICATIONS  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Paragraph 50.48(c)(5) of 10 CFR Part 50 requires that plans and schedules for meeting the provisions of Paragraphs (c)(2), (c)(3), and (c)(4) be submitted within thirty days of the effective date of the new Section 50.48. We interpret this requirement to include proposed fire protection modifications not previously accepted by the Staff, as well as other modifications needed to meet the requirements of Sections III.G, III.J, and III.O of the new Appendix R to 10 CFR Part 50.

The Licensee has made numerous submittals to the Staff over the past five years related to the implementation of NRC fire protection requirements. The Fire Protection Safety Evaluation Report (SER) for Point Beach Nuclear Plant Units 1 and 2 was issued on August 2, 1979. A supplement to the SER was issued on October 21, 1980. Modifications not previously accepted by the Staff are those items identified in Enclosure 3 of a January 22, 1981 letter from the Staff. The status of those items has been addressed in our letter to you dated March 2, 1981.

Following is a listing of all of the items not previously accepted by the Staff, as identified in the January 22 letter, for which we are able to provide plans for the modifications required by Section 50.48(c), or for which plans are not required. All of the modifications are scheduled for completion prior to November 17, 1981.

1. Item 3.1.1 Water Damage Protection

The SER Supplement stated that floor drains were required in the cable spreading room to prevent damage to safety-related equipment. Design

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information for the cable spreading room floor drain system was provided as Enclosure A to our March 2, 1981 letter.

2. Item 3.1.9 Fire Barriers

The SER Supplement states that the licensee should implement the following modifications:

- a. Upgrade the control building walls that could be affected by a turbine lube oil reservoir fire to a three-hour fire rating, including fire dampers, fire doors and penetration seals. This work is in progress.
- b. Upgrade the wall of the cable spreading room and diesel generator room to a three-hour fire rating including all openings and penetrations. This work is in progress.
- c. Upgrade the viewing window of the control room wall to a two-hour fire rating, as well as upgrade the wall to a two-hour fire rating that separates the service building and general auxiliary building ventilation exhaust filters from the remainder of the auxiliary building.

Design information for two-hour rated fire doors and dampers was provided as Enclosure B to our March 2 letter. The equipment has been purchased and will be installed.

3. Item 3.1.15 Ventilation System Control Cables

Enclosure 2 to the January 22 letter from the Staff stated that the licensee should either protect the redundant control cables and junction boxes for the diesel generator room ventilation systems, or verify that their loss due to a fire would have no effect on safe shutdown capability following a fire.

Our March 2 letter stated that we have reviewed the function of the subject cables and junction boxes and have verified that their loss due to a fire would not affect operation of the diesel generator room ventilation systems. Therefore, safe shutdown capability would not be affected and no modifications are needed for compliance with Appendix R.

4. Item 3.1.24 Diesel Generator Air Intake Structure

The SER Supplement states that a three-hour fire-rated enclosure should be provided around the existing air intake structures for the diesel generators so that combustion and ventilation air can be obtained directly from outdoors, as well as from inside the building to ensure startup capability in the event of a turbine building fire.

Enclosure C to our March 2 letter contains our plans to permanently supply outdoor air for combustion and ventilation purposes to the diesel generator rooms. A verification test report is included in Enclosure C. This modification satisfies the requirements of Appendix R without the installation of fire-rated ducting and associated fire dampers.

5. Item 3.1.26 Auxiliary Building Cable Tray Penetration Seals

The SER Supplement states that the licensee will be required to install three-hour fire-rated cable tray penetration seals in the auxiliary building cubicle walls. The auxiliary building cable tray penetration seal work is in progress.

6. Item 3.1.27 Containment Building Fire Stops

The SER Supplement states that installation of fire stops will be required to minimize combustible pathways between cable trays that pass through containment building compartment walls. This modification has been completed in Unit 1 containment. Unit 2 containment installation will be implemented during the spring 1981 refueling outage.

7. Item 3.1.28 Service Building Penetration Seals

The SER Supplement states that three-hour fire-rated seals will be required in all cable tray penetrations from the service building to safety-related areas. This work is in progress.

8. Item 3.1.32 Fire Hydrant Inspections

This item does not involve the installation of a modification required to satisfy Paragraph (c)(2), (c)(3), or (c)(4) of Section 50.48.

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The SER Supplement states that the licensee should inspect the hydrants every six months for possible damage and to ensure that the hydrant barrels are dry. Enclosure D to our March 2 letter contains the PBNP fire equipment surveillance procedure which includes monthly fire hydrant inspection. This procedure has been implemented.

9. Item 3.1.33 Control Room Light Fixtures

As stated in our March 2 letter, this modification has been completed.

10. Item 3.2.4 Fire Brigade Training Frequency

This item does not involve the installation of a modification required to satisfy Paragraph (c)(2), (c)(3), or (c)(4) of Section 50.48.

The SER Supplement held this item open because of the frequency of practice sessions and the inclusion of the shift supervisor as a member of the fire brigade. The training program now in effect calls for annual practice sessions in accordance with Section III.I of Appendix R. However, Licensee has filed a request for exemption from the provision of Section III.H which excludes the shift supervisor from the fire brigade.

The reassessment to determine compliance with Section III.G and III.O of Appendix R has not been completed; however, we have requested by letter dated March 18, 1981, extensions of the time limit specified in Paragraph 50.48(c)(5) for submission of the plans and schedules for modifications which may be required for compliance with Sections III.G and III.O, and for submission of design descriptions of modifications needed to satisfy Section III.G.3. The reassessment with respect to Section III.G will include consideration of Items 3.1.14 (Cable Separation), 3.1.17 (Hydrogen Hazard Protection), 3.2.1 (Safe Shutdown Capability), and 3.2.2 (Circulating Water Pump House Fire Protection) as identified in the Staff's January 22 letter. Item 3.2.6 (RCP Lube Oil Collection System) will be included in the Section III.O reassessment.

Our reassessment of the design features at the plant for compliance with the requirements of Section III.J has been completed. Emergency lighting provisions are listed in Section 4.6 of the PBNP Fire Protection Review. These include:

1. Fixed D.C. emergency lighting powered by the diesel generators through inverters or by the station batteries in the cable spreading room, control room, diesel generator rooms and the switchgear room.

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2. Battery-powered hand units in various plant areas.
3. Specifically identified battery-powered hand units included with fire fighting equipment for fire brigade use.

The eight-hour capacity of the battery-powered hand units was demonstrated to the NRC review team during their September 6-9, 1977 plant visit. We believe no further action is required as a result of our reassessment.

We would be pleased to respond to any questions which you may have regarding any of our fire protection submittals.

Very truly yours,

C. W. Fay, Director  
Nuclear Power Department

Copy to: Mr. R. A. Clark, Chief  
Operating Reactors Branch 3  
NRC Resident Inspector  
Point Beach Nuclear Plant