

# NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY  
THE HARTFORD ELECTRIC LIGHT COMPANY  
WESTERN MASSACHUSETTS ELECTRIC COMPANY  
HOLYoke WATER POWER COMPANY  
NORTHEAST UTILITIES SERVICE COMPANY  
NORTHEAST TRAILER ENERGY COMPANY

P.O. BOX 270  
HARTFORD, CONNECTICUT 06101  
(203) 666-6911

January 2, 1979

Docket No. 50-336

Director of Nuclear Reactor Regulation  
Attn: Mr. R. Reid, Chief  
Operating Reactors Branch #4  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

References: (1) R. Reid letter to W. G. Counsil dated September 19, 1978.  
(2) W. G. Counsil letter to D. L. Ziemann and R. Reid dated August 17, 1978.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 2  
Fire Protection

In Reference (1), Northeast Nuclear Energy Company (NNECO) was issued Amendment No. 43 to the Millstone Unit No. 2 operating license which consisted of Technical Specification changes and license conditions related to fire protection. The Safety Evaluation for this amendment summarized the Staff evaluation of the fire protection program at Millstone Unit No. 2. The evolution of Reference (1) involved numerous iterations and negotiations ranging from verbal commitments to docketed responses and every effort was made to eliminate misunderstandings in all phases of the process. However, our review of Reference (1) has identified several items which require correction and/or clarification of the NNECO position. Each item in question from the SER has been listed below, followed by the NNECO position and justification. In most instances the clarification references a different section within the SER.

Section 3.2.4 Cable Fire Barrier Penetrations Test Data

SER: "Test data will be provided to demonstrate the adequacy of electrical cable fire barrier penetrations."

NNECO Position:

Test data on all new penetrations will be provided to demonstrate the adequacy of electrical cable fire barrier penetrations. As stated in Section 4.9, tests have been conducted to demonstrate that the existing cable penetration seals have an adequate fire rating. Therefore, test data on new penetrations will be sufficient to ensure that the fire barrier penetrations will adequately prevent the spread of fires.

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#### Section 4.7 Communication Systems

SER: "A second system consists of telephone stations located throughout the plant."

#### NNECO Position:

The system is more accurately described by the statement: "A second system consists of telephone jack stations located throughout the plant."

#### Section 4.7 Communication Systems

SER: "We find that, subject to the provision of portable radio communications, the communications are adequate to coordinate fire fighting and safe shutdown activity."

#### NNECO Position:

The words "subject to the provision of portable radio communications" should be deleted. As stated at the bottom of Page 4-6, "Portable communications radios are provided for emergency use", and are currently in use.

#### Section 5.2.5 Cable Spreading Area - Adequacy of Fire Protection

SER: "Due to the limited separation between redundant electrical cables for shutdown systems, the limited access which prevents effective manual fire fighting, and a concern for the effectiveness of the ceiling mounted manually actuated deluge system, the present fire protection for this area does not provide adequate assurance that fire damage could not result in a loss of shutdown capability."

#### NNECO Position:

NNECO disagrees with this statement. As stated in Reference (2), an evaluation will be performed for the cable spreading area to determine if redundant cable systems are routed in close proximity and determine the best possible method of providing either isolation, separation, or additional protection, if necessary. Concerning access to this area, the three points of access permit sufficient manual fire fighting capability. Also, the Staff's concern for the effectiveness of the ceiling mounted deluge system is not substantiated. Therefore, any conclusions as to the inadequacy of the fire protection in this area are premature. An evaluation is in progress.

#### Section 5.8.6 Auxiliary Building - Modifications

SER: "Automatic sprinklers or suitable fire barriers will be provided to assure that fire damage does not result in a loss of shutdown capability where prompt action is not taken to suppress fires in these areas."

#### NNECO Position:

Protective measures, consisting of either automatic sprinklers, fire barriers, fire retardant coatings, or detection, will be provided to assure that fire damage does not result in a loss of shutdown capability. Reference to a lack of prompt action is also inappropriate.

Section 5.10.6 Containment - Modifications

SER: "Detection systems will be provided at the elevation above the cable trays and in the reactor coolant , "p areas."

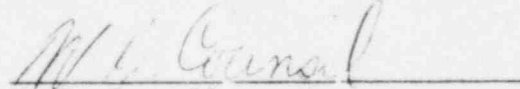
NNECO Position:

Existing detection systems will be expanded to provide coverage for cable tray concentrations. Detection will also be provided for the reactor coolant pump area.

We trust that due consideration will be given to these concerns in subsequent correspondence on this subject.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

A handwritten signature in dark ink, appearing to read "W. G. Counsil", is written over a horizontal line.

W. G. Counsil  
Vice President