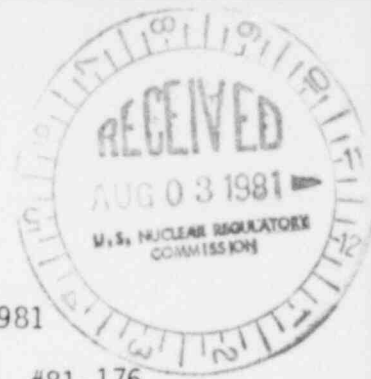


BOSTON EDISON COMPANY  
GENERAL OFFICES 800 BOYLSTON STREET  
BOSTON, MASSACHUSETTS 02199

A. V. MORISI  
MANAGER  
NUCLEAR OPERATIONS SUPPORT DEPARTMENT



July 27, 1981

BECo. Ltr. #81-176

Mr. Thomas A. Ippolito, Chief  
Operating Reactors Branch #2  
Division of Licensing  
Office of Nuclear Regulatory Commission  
Washington, D. C. 20555

License No. DPR-35  
Docket No. 50-293

Fire Protection Modification Implementation

- References:
- a.) SER accompanying Amendment #35 to O.L. DPR-35 dated 12-21-78
  - b.) Fire Protection System Review APCSB 9.5-1 for PNPS I
  - c.) BECo. Letter (G. C. Andognini) to NRC (D. L. Ziemann) dated 2-27-78

Dear Sir:

The Safety Evaluation Report accompanying Amendment #35 (Reference a) to our Operating License concluded that implementation of the modifications to Fire Protection Systems as proposed by Boston Edison would result in an acceptable fire protection program for Pilgrim Nuclear Power Station.

During the implementation of these modifications, Boston Edison has by way of correspondence and telephone discussions endeavored to keep your office apprised of any changes in design or delays in schedule. As part of our final efforts in this regard, our fire protection group recently performed a review of initially proposed vs. final modifications and discovered 7 items which have not been formally identified to your office. Therefore, the attached presents a list of those items, the reasons for any changes and a safety evaluation basis where applicable.

Should you have any questions or concerns as a result of your review of the attached, please do not hesitate to contact us.

Very truly yours,

*A. V. Morisi*

Attachment A

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## ATTACHMENT A

### 1. Control Room:

Reference "A", Page 5-14, states that eight fire doors and door assemblies separating the Control Room from the adjacent offices will be replaced with 3-hour rated assemblies.

#### Final Modification:

Only 5 doors exist separating the Control Room from the adjacent areas and all 5 of these doors are 3-hour fire rated doors.

#### Reason for Change and S.E. Basis:

Although BECo response to NRC Question #5, Reference "C", lists eight doors in the Control Room area that were going to be changed to 3-hour rated doors, 3 of those doors only separate the Control Room from adjacent offices. A total of 8 fire doors were replaced in the Control Room area but only 5 doors actually separate the Control Room from adjacent plant areas.

### 2. Automatic Closing Fire Doors:

Reference "A", Page 5-9, called for the installation of an automatic closing 3-hour fire door to separate RBCCW Pump Room A & B. It was also stated that the adequacy of the fire protection features provided for this area will be addressed in a supplement SER.

#### Final Modification:

An automatic closing 3-hour fire door was installed between RBCCW Pump Rooms A & B (Door #6) and in addition between the Switchgear Room B and the corridor (Door #90). These doors are normally open and close automatically if there is a fire. Door #6 closes via a fusible link and upon actuation of the smoke detectors in either RBCCW Pump Room A or B. Door #90 closes via a fusible link and upon actuation of the Halon System in the Computer Room. The closure of both Door #6 and #90 are monitored in the Control Room. We are also in the process of modifying the control for Door #90 so it will also close upon actuation of the smoke detectors in the Switchgear Room "B".

### 3. Door (#24) From Air Compressor Room to Corridor

BECo response to Reference "C", Question #5 stated BECo would install a 3-hour fire rated door at Door #24.

#### Final Modification:

Door #93 was changed to a 3-hour fire rated door instead of Door #24.

#### Reason for Change and S.E. Basis

Originally, the fire zone for the Cable Spreading Room (Zone 3.2) was to include the corridor & stairwell on the west side of the room. The reason for the zone extension was because the plant wanted a glass door in the Cable Spreading Room and a 3-hour rated door could not be obtained with a glass door. Door #24 was going to be changed to a 3-hour door and this door would now become the boundary for fire zone 3.2. Prior to the installation of door #24, station security criteria was updated to require the presence of two men in vital plant area. The fact that the Cable Spreading Room was listed as a vital area alleviated the need for glass panels and allowed for the installation of a 3-hour rated door at Door #93. The fire zone for the Cable Spreading Room was reduced to the area that just included the Cable Spreading Room and thus Door #24 did not need updating.

#### 4. Valve Gallery

BECO response to Question #5, (Reference "C"), states that Door #5 between the Valve Gallery and the Cation Regeneration Tank Room would be replaced with a 3-hour fire door.

##### Final Modifications:

Door #5 was not changed and Door #12 was changed to a 3-hour fire door.

#### Reason for Change and S.E. Basis

Since Door #5 and #12 are located in tandem to a common entrance to the tank room, Door #12 was replaced instead of Door #5 because of ALARA reasons.

#### 5. HPCI Pump Room

Reference "A", Page 5-7, states that BECO will lock or electrically supervise the door between the HPCI pump room and the HPCI control panel and valve room area.

##### Final Modification:

No such door exists between the HPCI pump room and the HPCI control panel and valve room area, nor has BECO ever committed to installing a door between the two areas.

#### Reason for Change and S.E. Basis

Although Reference "B" separated the HPCI Quadrant into two separate fire areas, we consider this separation to be unnecessary since both areas contain only one division of "B" safety related equipment. This in turn allows a safe plant shutdown even if a single fire is assumed to affect both areas. In addition, the combustible loading in this area is very low and both rooms are covered by a smoke detection system.

#### 6. Door from Administration Bldg. to Reactor Building Corridor

BECO response to NRC staff concern P5 (Reference "C") states that Door #124 between the Administration Building and the Reactor Building corridor is a 3-hour fire door and would be equipped with access control equipment.

Final Modification:

Door #124 is rated for 1½ hours.

Reason for Change and S.E. Basis

The corridor is separated from other plant areas by another 1½ hour rated door (#142) that is approximately 40 feet east of Door #124. The nearest safety related equipment to Door #142 is located in the condensate demineralizer area which is approximately 20 feet below Door #142. Also, the combustible loading is low enough in the area of Door #124 to justify the 1½ hour fire door rating.

7. Cable Spreading Room

Reference "A", Page 3-3 & 4-12, states that installed dampers will be replaced with three-hour rated dampers to be consistent with the fire rating needed for the enclosure.

Actual Conditions

The CO<sub>2</sub> exhaust duct that penetrates the East wall of the Cable Spreading Room does not have a fire damper.

Discussion

Boston Edison will install a 3-HR fire rated damper consistent with the fire rating needed for the Cable Spreading Room enclosure by 1-1-82.