



**Commonwealth Edison**

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August 31, 1981

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

Subject: Byron Station Units 1 and 2  
Braidwood Station Units 1 and 2  
Fire Protection  
NRC Dockets 50-454, 50-455, 50-456  
and 50-457

Reference (a): June 3, 1981, letter from  
R. L. Tedesco to J. S. Abel.



Dear Mr. Denton:

This letter provides additional information requested by the NRC in reference (a) regarding fire protection at Byron and Braidwood.

Attachment A to this letter contains our assessment of the conformance of the Byron and Braidwood plants to the provisions of Appendix R to 10 CFR 50. Additional information summarizing our analysis of the safe shutdown of a plant following a fire will be provided by October 15, 1981.

This information will be incorporated into the Byron/Braidwood FSAR in the next amendment. Fifteen (15) copies are provided now for your early review and approval. Fifty-nine (59) copies of this letter are provided.

Please address further questions regarding this matter to this office.

Very truly yours,

T. R. Tramm  
Nuclear Licensing Administrator

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ATTACHMENT A

Byron/Braidwood

Appendix R Assessment

APPENDIX R--FIRE PROTECTION PROGRAM FOR NUCLEAR  
POWER FACILITIES OPERATING PRIOR TO JAN. 1, 1979

10 CFR 50 APPENDIX R

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REMARKS

I. Introduction and Scope

This Appendix applies to licensed nuclear power electric generating stations that were operating prior to January 1, 1979, except to the extent set forth in paragraph 50.48(b) of this part. With respect to certain generic issues for such facilities it sets forth fire protection features required to satisfy Criterion 3 of Appendix A to this part.

Criterion 3 of Appendix A to this part specifies that "Structures, systems, and components important to safety shall be designed and located to minimize, consistent with other safety requirements, the probability and effect of fires and explosions."

When considering the effects of fire, those systems associated with achieving and maintaining safe shutdown conditions assume major importance to safety because damage to them can lead to core damage resulting from loss of coolant through boiloff.

The phrases "important to safety," or "safety-related," will be used throughout this Appendix R as applying to all safety functions. The phrase "safe shutdown" will be used throughout this Appendix R as applying to both hot and cold shutdown functions.

Because fire may affect safe shutdown systems and because the loss of function of systems used to mitigate the consequences of design basis accidents under postfire conditions does not per se impact public safety, the need to limit fire damage to systems required to achieve and maintain safe shutdown conditions is greater than the need to limit fire damage to those systems required to mitigate the consequences of design basis accidents. Three levels of fire damage limits are established according to the safety functions of the structure, system, or component:

Although Appendix R to 10 CFR 50 applies strictly to plants licensed to operate prior to January 1, 1979, the NRC has made conformance to 10 CFR 50 Appendix R a licensing requirement for Byron/Braidwood. See NRC question 600.01 (June 3, 1981).

The design basis of the Byron/Braidwood plant has from the beginning been that Hot Standby (as defined in the Technical Specifications) is a "safe shutdown" condition, since the plant can be maintained in Hot Standby for an extended period of time from outside the control room. However, an evaluation is presently being performed of the ability to reach cold shutdown from the remote shutdown panels. Modifications to enable this will be made if necessary.

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Safety FunctionFire Damage Limits

Hot Shutdown...One train of equipment necessary to achieve hot shutdown from either the control room or emergency control station(s) must be maintained free of the damage by a single fire, including an exposure fire.<sup>1</sup>

Cold Shutdown...Both trains or equipment necessary to achieve cold shutdown may be damaged by a single fire, including an exposure fire, but damage must be limited so that at least one train can be repaired or made operable within 72 hours using onsite capability.

Design Basis Accidents...Both trains of equipment necessary for mitigation of consequences following design basis accidents may be damaged by a single exposure fire.

The most stringent fire damage limit shall apply for those systems that fall into more than one category. Redundant systems used to mitigate the consequences of other design basis accidents but not necessary for safe shutdown may be lost to a single exposure fire. However, protection shall be provided so that a fire within only one such system will not damage the redundant system.

General RequirementsA. Fire Protection Program

A fire protection program shall be established at each nuclear power plant. The program shall establish the fire protection policy for the protection of structures, systems, and components important to safety at each plant and the procedures, equipment, and personnel required to implement the program at the plant site.

The fire protection program shall be under the direction of an individual who has been delegated authority commensurate with the responsibilities of the position and who has available staff personnel knowledgeable in both fire protection and nuclear safety.

The applicants fire protection program complies with these requirements.

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<p>3. Fire detection systems, portable extinguishers, and standpipe and hose stations shall be installed.</p> <p>4. Fire barriers or automatic suppression systems or both shall be installed as necessary to protect redundant systems or components necessary for safe shutdown.</p> <p>5. A site fire brigade shall be established, trained, and equipped and shall be on site at all times.</p> <p>6. Fire detection and suppression systems shall be designed, installed, maintained, and tested by personnel properly qualified by experience and training in fire protection systems.</p> <p>7. Surveillance procedures shall be established to ensure that fire barriers are in place and that fire suppression systems and components are operable.</p> <p>D. Alternative or Dedicated Shutdown Capability</p> <p>In areas where the fire protection features cannot ensure safe shutdown capability in the event of a fire in that area, alternative or dedicated safe shutdown capability shall be provided.</p>	<p>Not presently demonstrated.</p>	<p>Will be addressed by Safe Shutdown Analysis.</p>
<p>III. Specific Requirements</p> <p>A. Water supplies for Fire Suppression Systems</p> <p>Two separate water supplies shall be provided to furnish necessary water volume and pressure to the fire main loop.</p> <p>Each supply shall consist of a storage tank, pump, piping, and appropriate isolation and control valves. Two separate redundant suctions in one or more intake structures from a large body of water (river, lake, etc.) will satisfy the requirement for two separated water storage tanks. These supplies shall be separated so that a failure of one supply will not result in a failure of the other supply.</p>	<p>The P/B design complies with this requirement as described in Appendix 5.4, Subsection A5.4.1 of the FPR.</p>	

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The fire protection program shall extend the concept of defense-in-depth to fire protection in fire areas important to safety, with the following objectives:

- to prevent fires from starting;
- to detect rapidly, control, and extinguish promptly those fires that do occur;
- to provide protection for structures, systems, and components important to safety so that a fire that is not promptly extinguished by the fire suppression activities will not prevent the safe shutdown of the plant.

## b. Fire Hazards Analysis

A fire hazard analysis shall be performed by qualified fire protection and reactor systems engineers to (1) consider potential in situ and transient fire hazards; (2) determine the consequences of fire in any location in the plant on the ability to safely shut down the reactor or on the ability to minimize and control the release of radioactivity to the environment; and (3) specify measures for fire prevention, fire detection, fire suppression, and fire containment and alternative shutdown capability as required for each fire area containing structures, systems, and components important to safety in accordance with NRC guidelines and regulations.

## c. Fire Prevention Features

Fire Protection features shall meet the following general requirements for all fire areas that contain or present a fire hazard to structures, systems, or components important to safety.

1. In situ fire hazards shall be identified and suitable protection provided.
2. Transient fire hazards associated with normal operation, maintenance, repair, or modification activities shall be identified and eliminated where possible. Those transient fire hazards that can not be eliminated shall be controlled and suitable protection provided.

A Fire Hazards Analysis was performed for the Byron/Braidwood stations and was included with the Fire Protection Report, filed with the NRC on October 31, 1977. This report documented conformance with BTP APCSB 9.5-1, Appendix A, but did not specifically address safe shutdown capability, the subject of Appendix R.

The fire prevention program and plant features meet these requirements.

The applicant is currently performing a Safe Shutdown Analysis which will demonstrate the ability to safely shut-down the plant following a fire in any fire zone. The results of this analysis will be included in an amendment to the Fire Protection Report, scheduled for submittal to the NRC in October 15, 1981.

Each supply of the fire water distribution system shall be capable of providing for a period of 2 hours the maximum expected water demands as determined by the fire hazards analysis for safety-related areas or other areas that present a fire exposure hazard to safety-related areas.

When storage tanks are used for combined service-water/fire-water uses the minimum volume for fire uses shall be ensured by means of dedicated tanks or by some physical means such as vertical standpipe for other water service. Administrative controls, including locks for tank outlet valves, are unacceptable as the only means to ensure minimum water volume.

Other water systems used as one of the two fire water supplies shall be permanently connected to the fire main system and shall be capable of automatic alignment to the fire main system. Pumps, controls, and power supplies in these systems shall satisfy the requirements for the main fire pumps. The use of other water systems for fire protection shall not be incompatible with their functions required for safe plant shutdown. Failure of the other system shall not degrade the fire main system.

**B. Sectional Isolation Valves**

Sectional isolation valves such as post indicator valves or key operated valves shall be installed in the fire main loop to permit isolation of portions of the main fire main loop for maintenance or repair without interrupting the entire water supply.

**C. Hydrant Isolation Valves**

Valves shall be installed to permit isolation of outside hydrants from the fire main for maintenance or repair without interrupting the water supply to automatic or manual fire suppression systems in any area containing or presenting a fire hazard to safety-related or safe shutdown equipment.

The B/B design complies with this requirement as described in Appendix 5.4, Sub-section 5.4.1 of the FPR.

The B/B design complies with this requirement as described in Appendix 5.4, Sub-section 5.4.1 of the FPR.

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## D. Manual Fire Suppression

Standpipe and hose systems shall be installed so that at least one effective host steam will be able to reach any location that contains or presents an exposure fire hazard to structures, systems, or components important to safety.

Access to permit effective functioning of the fire brigade shall be provided to all areas that contain or present an exposure fire hazard to structures, systems, or components important to safety.

Standpipe and hose stations, shall be inside FWR containments and BWR containments that are not inerted. Standpipe and hose stations inside containment may be connected to a high quality water supply of sufficient quantity and pressure other than the fire main loop if plant-specific features prevent extending the fire main supply inside containment. For BWR drywells, standpipe and hose stations shall be placed outside the dry well with adequate lengths of hose to reach any location inside the dry well with an effective hose stream.

B/B complies. See FPR Appendix 5.4, Subsection A5.4.7.

Compliance with this requirement has not been demonstrated.

B/B complies. See FPR Section 2.3.1 and Appendix 5.4, Subsection A5.4.7.

Access provisions specifically for firefighting have not been discussed. The fire protection report discusses access only in general terms. See FPR Section 3.4, paragraph D.4 (f).

## E. Hydrostatic Hose Tests

Fire hose shall be hydrostatically tested at a pressure of 300 psi or 50 psi above maximum fire main operating pressure, whichever is greater. Hose stored in outside hose houses shall be tested annually. Interior standpipe hose shall be tested every three years.

Compliance with this requirement has not been demonstrated.

Testing and maintenance of fire protection equipment is discussed in FPR Section 3.2, paragraph B.5 (a).

## F. Automatic Fire Detection

Automatic fire detection systems shall be installed in all areas of the plant that contain or present an exposure fire hazard to safe shutdown or safety-related systems or components. These fire detection systems shall be capable of operating with or without offsite power.

B/B complies. See FPR Appendix 5.4, Subsection A5.4.8.



## G. Fire Protection of Safe Shutdown Capability

1. Fire protection features shall be provided for structures, systems, and components important to safe shutdown. These features shall be capable of limiting fire damage so that:
  - a. One train of systems necessary to achieve and maintain hot shutdown conditions from either the control room or emergency control station(s) is free of fire damage; and
  - b. Systems necessary to achieve and maintain cold shutdown from either the control room or emergency control station(s) can be repaired within 72 hours.
2. Except as provided for paragraph G.3 of this section, where cables or equipment, including associated non-safety circuits that could prevent operation or cause maloperation due to hot shorts, open circuits, or shorts to ground, or redundant trains of systems necessary to achieve and maintain hot shutdown conditions are located within the same fire area outside of primary containment, one of the following means of ensuring that one of the redundant trains is free of fire damage shall be provided:
  - a. Separation of cables and equipment and associated non-safety circuits of redundant trains by a fire barrier having a 3-hour rating. Structural steel forming a part of or supporting such fire barriers shall be provided to provide fire resistance equivalent to that required of the barrier;
  - b. Separation of cables and equipment and associated non-safety circuits of redundant trains by a horizontal distance of more than 20 feet with no intervening combustible or fire hazards. In addition, fire detectors and an automatic fire suppression system shall be installed in the fire area; or

Compliance has not been demonstrated.

Will be addressed by Safe Shutdown Analysis.

Compliance has not been demonstrated.

Will be addressed by Safe Shutdown Analysis.

- c. Enclosure of cable and equipment and associated non-safety circuits of one redundant train in a fire barrier having a 1-hour rating. In addition, fire detectors and an automatic fire suppression system shall be installed in the fire area;

Inside noninerted containments one of the fire protection means specified above or one of the following fire protection means shall be provided:

- d. Separation of cables and equipment and associated non-safety circuits of redundant trains by a horizontal distance of more than 20 feet with no intervening combustibles or fire hazards;
- e. Installation of fire detectors and an automatic fire suppression system in the fire area; or
- f. Separation of cables and equipment and associated non-safety circuits of redundant trains by a noncombustible radiant energy shield.

3. Alternative or dedicated shutdown capability and its associated circuits, independent of cables, systems or components in the area, room or zone under consideration, shall be provided;

- a. Where the protection of systems whose function is required for hot shutdown does not satisfy the requirement of paragraph G.2 of this section; or
- b. Where redundant trains of systems required for hot shutdown located in the same fire area may be subject to damage from fire suppression activities or from the rupture or inadvertent operation of fire suppression systems.

In addition, fire detection and a fixed fire suppression system shall be installed in the area, room, or zone under consideration.

Compliance has not been demonstrated.

Will be addressed by Safe Shutdown Analysis.

**H. Fire Brigade**

A site brigade trained and equipped for fire fighting shall be established to ensure adequate manual fire fighting capability for all areas of the plant containing structures, systems, or components important to safety. The fire brigade shall be at least five members on each shift. The brigade leader and at least two brigade members shall have sufficient training in or knowledge of plant safety-related systems to understand the effects of fire and fire suppressants on safe shutdown capability. The qualification of fire brigade members shall include an annual physical examination to determine their ability to perform strenuous fire fighting activities. The shift supervisor shall not be a member of the fire brigade. The brigade leader shall be competent to assess the potential safety consequences of a fire and advise control room personnel. Such competence by the brigade leader may be evidenced by possession of an operator's license or equivalent knowledge of plant safety-related systems.

The minimum equipment provided for the brigade shall consist of personal protective equipment such as turnout coats, boots, gloves, hard hats, emergency communications equipment, portable lights, portable ventilation equipment, and portable extinguishers. Self-contained breathing apparatus using full-face positive-pressure masks approved by NIOSH (National Institute for Occupational Safety and Health-approval formerly given by the U. S. Bureau of Mines) shall be provided for fire brigade, damage control, and control room personnel. At least 10 masks shall be available for fire brigade personnel. Control room personnel may be furnished breathing air by a manifold system piped from a storage reservoir if practical. Service or rated operating life shall be a minimum of on-half hour for the self-contained units.

The fire brigade will meet the requirements stated herein, except that exception is taken to the performance standards required by the annual physical examination. The wording "ability to perform strenuous fire fighting activities is lacking in specific detail and is open to wide interpretation. The annual physical will demonstrate that fire brigade members are capable of performing unrestricted physical activity.

At least two extra air bottles shall be located onsite for each self-contained breathing unit. In addition, an onsite 6-hour supply of reserve air shall be provided and arranged to permit quick and complete replenishment of exhausted supply air bottles as they are returned. If compressors are used as a source of breathing air, only units approved for breathing air shall be used; compressors shall be operable assuming a loss of onsite power. Special care must be taken to locate the compressor in areas free of dust and contaminants.

#### I. Fire Brigade Training

The fire brigade training program shall ensure that the capability to fight potential fires is established and maintained. The program shall consist of an initial classroom instruction program followed by periodic classroom instruction, fire fighting practice, and fire drills.

##### 1. Instruction

##### a. The initial classroom instruction shall include:

- (1) Indoctrination of the plant fire fighting plan with specific identification of each individual's responsibilities.
- (2) Identification of the type and location of fire hazards and associated types of fires that could occur in the plant.
- (3) The toxic and corrosive characteristics of expected products of combustion.
- (4) Identification of the location of fire fighting equipment for each fire area and familiarization with the layout of the plant, including access and egress routes to each area.

Exception is also taken to the requirement for "at least two extra air bottles" for each of ten masks. Since the station fire brigade is only needed for a maximum of 20 minutes until the Byron Fire Department arrives, the need for extra air bottles does not exist. At least 20 extra air bottles, not exclusively reserved for fire fighting, will be available on site.

The fire brigade training program meets the requirements presented herein, with one exception noted below.

- (5) The proper use of available fire fighting equipment and the correct method of fighting each type of fire. The types of fires covered should include fires in energized electrical equipment, fires in cables and cable trays, hydrogen fires, fires involving flammable and combustible liquids or hazardous process chemicals, fires resulting from construction or modifications (welding), and record file fires.
- (6) The proper use of communication, lighting, ventilation, and emergency breathing equipment.
- (7) The proper method for fighting fires inside buildings and confined spaces.
- (8) The direction and coordination of the fire fighting activities (fire brigade leaders only).
- (9) Detailed review of fire fighting strategies and procedures.
- (10) Review of the latest plant modifications and corresponding changes in fire fighting plans.

NOTE: Items (9) and (10) may be deleted from the training if no more than two of the non-operations personnel who may be assigned to the fire brigade.

- b. The instruction shall be provided by qualified individuals who are knowledgeable, experienced, and suitably trained in fighting the types of fires that could occur in the plant and in using the types of equipment available in the nuclear power plant.
- c. Instruction shall be provided to all fire brigade members and fire brigade leaders.

d. Regular planned meetings shall be held at least every 3 months for all brigade members to review changes in the fire protection program and other subjects as necessary.

e. Periodic refresher training sessions shall be held to repeat the classroom instruction program for all brigade members over a two-year period. These sessions may be concurrent with the regular planned meetings.

## 2. Practice

Practice sessions shall be held for each shift fire brigade on the proper method of fighting the various types of fires that could occur in a nuclear power plant. These sessions shall provide brigade members with experience in actual fire extinguishment and the use of emergency breathing apparatus under strenuous conditions encountered in fire fighting. These practice sessions shall be provided at least once per year for each fire brigade member.

## 3. Drills

a. Fire brigade drills shall be performed in the plant so that the fire brigade can practice as a team.

b. Drills shall be performed at regular intervals not to exceed 3 months for each shift fire brigade. Each fire brigade member should participate in each drill, but must participate in at least two drills per year.

Exception is taken to the frequency of drills. Byron/Braidwood stations will operate with six rotating shifts. The six shift rotation precludes meeting the requirements specified in paragraph f.3.b. Shifts will be drilled at regular intervals not to exceed 6 months and each fire brigade member must participate in at least one drill per year.

A sufficient number of these drills, but not less than one for each shift fire brigade per year, shall be unannounced to determine the fire fighting readiness of the plant fire brigade, brigade leader, and fire protection systems and equipment. Persons planning and authorizing an unannounced drill shall ensure that the responding shift fire brigade members are not aware that a drill is being planned until it is begun. Unannounced drills shall not be scheduled closer than four weeks.

At least one drill per year shall be performed on a "back-shift" for each shift fire brigade.

- c. The drills shall be preplanned to establish the training objectives of the drill and shall be critiqued to determine how well the training objectives have been met. Unannounced drills shall be planned and critiqued by members of the management staff responsible for plant safety and fire protection. Performance deficiencies of a fire brigade or of individual fire brigade members shall be remedied by scheduling additional training for the brigade or members.

Unsatisfactory drill performance shall be followed by a repeat drill within 30 days.

- d. At 3-year intervals, a randomly selected unannounced drill shall be critiqued by qualified individuals independent of the licensee's staff. A copy of the written report from such individuals shall be available for NRC review.

- e. Drills shall as a minimum include the following:

- (1) Assessment of fire alarm effectiveness, time required to notify and assemble fire brigade, and selection, placement and use of equipment, and fire fighting strategies.



(2) Assessment of each brigade member's knowledge of his or her role in the fire fighting strategy for the area assured to contain the fire. Assessment of the brigade member's conformance with established plant fire fighting procedures and use of fire fighting equipment, including self-contained emergency breathing apparatus, communication equipment, and ventilation equipment to the extent practicable.

(3) The simulated use of fire fighting equipment required to cope with the situation and type of fire selected for the drill. The area and type of fire chosen for the drill should differ from those used in the previous drill so that brigade members are trained in fighting fires in various plant areas. The situation selected should simulate the size and arrangement of a fire that could reasonably occur in the area selected, allowing for fire development due to the time required to respond, to obtain equipment and organize for the fire assuming loss of automatic suppression capability.

(4) Assessment of brigade leader's direction of the fire fighting effort as to thoroughness, accuracy, and effectiveness.

#### 4. Records

Individual records of training provided to each fire brigade member, including drill critiques, shall be maintained for at least 3 years to ensure that each member receives training in all parts of the training program. These records of training shall be available for NRC review. Retraining or broadened training for fire fighting within buildings shall be scheduled for all those brigade members whose performance records show deficiencies.



## J. Emergency Lighting

Emergency lighting units with at least an 8-hour battery power supply shall be provided in all areas needed for operation of safe shutdown equipment and in access and egress routes thereto.

## K. Administrative Controls

Administrative controls shall be established to minimize fire hazards in areas containing structures, systems, and components important to safety.

These controls shall establish procedures to:

1. Govern the handling and limitation of the use of ordinary combustible materials, combustible and flammable gases and liquids, high efficiency particulate air and charcoal filters, dry ion exchange resins, or other combustible supplies in safety-related areas.
2. Prohibit the storage of combustibles in safety-related areas or establish designated storage areas with appropriate fire protection.
3. Govern the handling of and limit transient fire loads such as combustible and flammable liquids, wood and plastic products, or other combustible materials in buildings containing safety-related systems or equipment during all phases of operating and especially during maintenance, modification, or refueling operations.
4. Designate the onsite staff member responsible for the inplant fire protection review of proposed work activities to identify potential transient fire hazards and specify required additional fire protection in the work activity procedure.

B/B complies. See FPR Section 3.4, paragraph D.5.

Administrative controls which will be in effect will comply with these requirements except for the exceptions noted below.

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5. Govern the use of ignition sources by use of a flame permit system to control welding, flame cutting, brazing, or soldering operations. A separate permit shall be issued for each area where work is to be done. If work continues over more than one shift, the permit shall be valid for not more than 24 hours when the plant is operating or for the duration of a particular job during plant shutdown.
6. Control the removal from the area of all waste, debris, scrap, oil spills, or other combustibles resulting from the work activity, immediately following completion of the activity, or at the end of each work shift, whichever comes first.
7. Maintain the periodic housekeeping inspections to ensure continued compliance with these administrative controls.
8. Control the use of specific combustibles in a safety-related areas. All wood used in safety-related areas during maintenance, modification, or refueling operations (such as lay-down blocks or scaffolding) shall be treated with a flame retardant. Equipment or supplies (such as new fuel) shipped in untreated combustible packing containers may be unpacked in safety-related areas if required for valid operating reasons. However, all combustible materials shall be removed from the area immediately following the unpacking. Such transient combustible material, unless stored in approved containers, shall not be left unattended during lunch breaks, shift changes, or other similar periods. Loose combustible packing material such as wood or paper excelsior, or polyethylene sheeting shall be placed in metal containers with tight-fitting self-closing metal covers.

The requirement that transient combustible materials not be left unattended during lunch breaks is impracticable to comply with. Prudent actions by the stations will ensure that whenever such transient materials must be left unattended, no ignition sources will be available. This will suffice.

9. Control actions to be taken by an individual discovering a fire.  
For example, notification of control room, attempt to extinguish fire, and actuation of local fire suppression systems.
10. Control actions to be taken by the control room operator to determine the need for brigade assistance upon report of a fire or receipt of alarm on control room annunciator panel, for example, announcing location of fire over PA system, sounding fire alarms, and notifying the shift supervisor and the fire brigade leader of the type, size, and location of the fire.
11. Control actions to be taken by the fire brigade after notification by the control room operator of a fire, for example, assembling in a designated location, receiving directions from the fire brigade leader, and discharging specific fire fighting responsibilities including selection and transportation of fire fighting equipment to fire location, selection of protective equipment, operating instructions for use of fire suppression systems, and use of preplanned strategies for fighting fires in specific areas.
12. Define the strategies for fighting fires in all safety-related areas and areas presenting a hazard to safety-related equipment. These strategies shall designate:
  - a. Fire hazards in each area covered by the specific prefire plans.
  - b. Fire extinguishants best suited for controlling the fires associated with the fire hazards in that area and the nearest location of these extinguishants.

It is impossible to write specific strategies to cover all items discussed. Generic procedures will be developed to provide the fire brigade with guidelines for fighting fires of any nature in any area.

- c. Most favorable direction from which to attack a fire in each area in view of the ventilation direction, access hallways, stairs, and doors that are most likely to be free of fire, and the best station or elevation for fighting the fire. All access and egress routes that involve locked doors should be specifically identified in the procedure with the appropriate precautions and methods for access specified.
- d. Plant systems that should be managed to reduce the damage potential during a local fire and the location of local and remote controls for such management (e.g., any hydraulic or electrical systems in the zone covered by the specific fire fighting procedure that could increase the hazards in the area because of overpressurization or electrical hazards).
- e. Vital heat-sensitive system components that need to be kept cool while fighting a local fire. Particularly hazardous combustibles that need cooling should be designated.
- f. Organization of fire fighting brigades and the assignment of special duties according to job title so that all fire fighting functions are covered by any complete shift personnel complement. These duties include command control of the brigade, transporting fire suppression and support equipment to the scenes, applying the extinguishant to the fire, communication with the control room, and coordination with outside fire departments.
- g. Potential radiological and toxic hazards in fire zones.
- h. Ventilation system operation that ensures desired plant air distribution when the ventilation flow is modified for fire containment or smoke clearing operations.
- i. Operations requiring control room and shift engineer coordination or authorization.

- j. Instructions for plant operators and general plant personnel during fire.

L. Alternative and Dedicated Shutdown Capability

1. Alternative or dedicated shutdown capability provided for a specific fire area shall be able to achieve and maintain subcritical reactivity conditions in the reactor, maintain reactor coolant inventory, achieve and maintain hot standby conditions for a PWR (hot shutdown for a BWR) and achieve cold shutdown conditions within 72 hours and maintain cold shutdown conditions thereafter. During the postfire shutdown, the reactor coolant system process variables shall be maintained within those predicted for a loss of normal a.c. power and the fission product boundary integrity shall not be affected; i.e., there shall be no fuel clad damage, rupture or any primary coolant boundary, or rupture of the containment boundary.

2. The performance goals for the shutdown functions shall be:

- a. The reactivity control function shall be capable of achieving and maintaining cold shutdown reactivity conditions.
- b. The reactor coolant makeup function shall be capable of maintaining the reactor coolant level above the top of the core for BWRs and be within the level indication in the pressurizer for PWRs.
- c. The reactor heat removal function shall be capable of achieving and maintaining decay heat removal.
- d. The process monitoring function shall be capable of providing direct readings of the process variables necessary to perform and control the above functions.

Compliance has not been demonstrated.

B/B complies.

Will be addressed by the Safe Shutdown Analysis.

The performance goals listed are presently being implemented in conducting the Safe Shutdown Analysis.

- e. The supporting functions shall be capable of providing the process cooling, lubrication, etc., necessary to permit the operation of the equipment used for safe shutdown functions.

3. The shutdown capability for specific fire areas may be unique for each such area, or it may be one unique combination of systems for all such areas. In either case, the alternative shutdown capability shall be independent of the specific fire area(s) and shall accommodate postfire conditions where offsite power is available and where offsite power is not available for 72 hours. Procedures shall be in effect to implement this capability.

Compliance has not been demonstrated.

Will be addressed by the Safe Shutdown Analysis.

4. If the capability to achieve and maintain cold shutdown will not be available because of fire damage, the equipment and systems comprising the means to achieve and maintain the hot standby or hot shutdown condition shall be capable of maintaining such conditions until cold shutdown can be achieved. If such equipment and systems will not be capable of being powered by both onsite and offsite electric power systems because of fire damage, an independent onsite power system shall be provided. The number

Compliance has not been demonstrated.

Will be addressed by the Safe Shutdown Analysis.

of operating shift personnel, exclusive of fire brigade members, required to operate such equipment and systems shall be on site at all times.

5. Equipment and systems comprising the means to achieve and maintain cold shutdown conditions shall not be damaged by fire; or the fire damage to such equipment and systems shall be limited so that the systems can be made operable and cold shutdown achieved within 72 hours. Materials for such repairs shall be readily available on site and procedures shall be in effect to implement such repairs. If such equipment and systems used prior to 72 hours after the fire will not be capable of being powered by both onsite and offsite electrical power systems because of fire damage an independent onsite power system shall be provided. Equipment and systems used after 72 hours may be powered by offsite power only.

Compliance has not been demonstrated.

Will be addressed by the Safe Shutdown Analysis.

6. Shutdown systems installed to ensure postfire shutdown capability need not be designed to meet seismic Category I criteria, single failure criteria, or other design basis accident criteria, except where required for other reasons, e.g., because of interface with or impact on existing safety systems, or because of adverse valve actions due to fire damage.

Compliance has not been demonstrated.

Will be addressed by the Safe Shutdown Analysis.

7. The safe shutdown equipment and systems for each fire area shall be known to be isolated from associated non-safety circuits in the fire area so that hot shorts, open circuits, or shorts to ground in the associated circuits will not prevent operation of the safe shutdown equipment. The separation and barriers between trays and conduits containing associated circuits of one safe shutdown division and trays and conduits containing associated circuits or safe shutdown division cables from the redundant division, or the isolation of these associated circuits from the safe shutdown equipment, shall be such that a postulated fire involving associated circuits will not prevent safe shutdown.

Compliance has not been demonstrated.

Will be addressed by the Safe Shutdown Analysis.



**M. Fire Barrier Cable Penetration Seal Qualification**

Penetration seal designs shall utilize only noncombustible materials and shall be qualified by tests that are comparable to tests used to rate fire barriers. The acceptance criteria for the test shall include:

1. The cable fire barrier penetration seal has withstood the fire endurance test without passage of flame or ignition of cables on the unexposed side for a period of time equivalent to the fire resistance rating required of the barrier;
2. The temperature levels recorded for the unexposed side are analyzed and demonstrate that the maximum temperature is sufficiently below the cable insulation ignition temperature; and
3. The fire barrier penetration seal remains intact and does not allow projection of water beyond the unexposed surface during the hose stream test.

**N. Fire Doors**

Fire doors shall be self-closing or provided with closing mechanisms and shall be inspected semiannually to verify that automatic hold-open, release, and closing mechanisms and latches are operable.

One of the following measures shall be provided to ensure they will protect the opening as required in case of fire:

1. Fire doors shall be kept closed and electrically supervised at a continuously manned location;
2. Fire doors shall be locked and inspected weekly to verify that the doors are in the closed position;

B/B complies. See FPR Appendix 5.2, Subsection A5.2.2.

B/B complies to the extent that all fire doors are self-closing as described in FPR Subsection 2.1.4.1. The nature and extent of electrical or administrative supervision of fire doors is not presently addressed in the FPR.



3. Fire doors shall be provided with automatic hold-open and release mechanisms and inspected daily to verify that doorways are free of obstructions; or

4. Fire doors shall be kept closed and inspected daily to verify that they are in the closed position.

The fire brigade leader shall have ready access to keys for any locked fire doors.

Areas protected by automatic total flooding gas suppression systems shall have electrically supervised self-closing fire doors or shall satisfy option 1 above.

**C. Oil Collection System for Reactor Coolant Pump**

The reactor coolant pump shall be equipped with an oil collection system if the containment is not inerted during normal operation. The oil collection system shall be so designed, engineered, and installed that failure will not lead to fire during normal or design basis accident conditions and that there is reasonable assurance that the system will withstand the Safe Shutdown Earthquake.

Such collection systems shall be capable of collecting lube oil from all potential pressurized and unpressurized leakage sites in the reactor coolant pump lube oil systems. Leakage shall be collected and drained to a vented closed container that can hold the entire lube oil system inventory. A flame arrester is required in the vent if the flash point characteristics of the oil present the hazard of fire flashback. Leakage points to be protected shall include lift pump and piping, overflow lines, lube oil cooler, oil fill and drain lines and plugs, flanged connections on oil lines, and lube oil reservoirs where such features exist on the reactor coolant pumps. The drain line shall be large enough to accommodate the largest potential oil leak.

B/B does not comply.

An expanded analysis of a fire resulting from burning the lubricating oil in a reactor coolant pump motor will be provided in Subsection 2.3.1.1 of the B/B Fire Protection Report