

PSNH PUBLIC SERVICE
Company of New Hampshire

SEABROOK STATION
Engineering Office:
1671 Worcester Road
Framingham, Massachusetts 01701
(617) - 872 - 8100

April 1, 1982
SBN-248
T.F. B 7.1.2



United States Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. Frank J. Miraglia, Chief
Licensing Branch No. 3
Division of Licensing

References: (a) Construction Permits CPPR-135 and CPPR-136, Docket Nos.
50-443 and 50-444
(b) PSNH Letter, dated November 27, 1981, "Response to
Acceptance Review Requests for Additional Information
(RAIs)," J. DeVincentis to D. G. Eisenhut

Subject: Seabrook Station Fire Protection Program

Dear Sir:

In fulfillment of our commitments, relative to the Seabrook Station Fire
Protection Program, delineated in Reference (b), we have enclosed two copies
of the following exhibits:

- Exhibit 1: Comparison to 10 CFR 50 (Appendix R); Fire Protection
Program for Operating Nuclear Power Plants.
- Exhibit 2: Seabrook Station Fire Protection Program Evaluation and
Comparison to BTP APCSB 9.5-1, Appendix A, Revision 1,
April, 1982.
- Exhibit 3: Seabrook Station Fire Protection of Safe Shutdown Capability
(10 CFR 50, Appendix R), April, 1982.

Ten additional copies of the above Exhibits will be provided to the NRC
Project Manager in the near future.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY

J. DeVincentis
J. DeVincentis
Project Manager

Enclosures

cc: Gage Babcock and Associates, Inc.
135 Addison Avenue
Elmhurst, Illinois 60126
Attn: Robert Barnes

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PDR ADOCK 05000443
F PDR

EXHIBIT 1

COMPARISON TO APPENDIX R TO 10CFR50; FIRE PROTECTION PROGRAM FOR OPERATING NUCLEAR POWER PLANTS

- References:
- (1) Seabrook Station Final Safety Analysis Report
 - (2) Seabrook Station Fire Protection Program Evaluation and Comparison to BTP 9.5-1, Appendix A
 - (3) Seabrook Station Fire Protection of Safe Shutdown Capability (10CFR50, Appendix R)

Public Service Company of New Hampshire (PSNH) has reviewed Appendix R to 10CFR50 to determine any area where the Seabrook Station Fire Protection Program does not meet with the intent of Appendix R. The results of that review are as follows:

Section II A, Fire Protection Program

We comply with the intent of this section. See Reference 2, Pages F13/15.

Section II B, Fire Hazard Analysis

We comply with the intent of this section. See Reference 2, in total, and Reference 3.

Section II C, Fire Prevention Features

We will comply with the intent of this section. See Reference 1, Section 9.5.1 for systems information. A site Fire Brigade will be established and will be on-site at all times after the start of plant operations.

Section II D, Alternative or Dedicated Shutdown Capability

We comply with the intent of this section. See Reference 3.

Section III A, Water Supplies for Fire Suppression Systems

We comply with the intent of this section. See Reference 1, Section 9.5.1, and Reference 2, Pages F-19/21.

Section III B, Sectional Isolation Valves

We comply with the intent of this section. See Reference 1, Section 9.5.1.

Section III C, Hydrant Isolation Valves

We comply with the intent of this section. No available references go to this minute detail.

Section III D, Manual Fire Suppression

We comply with the intent of this section. See Reference 1, Section 9.5.1.

Section III E, Hydrostatic Hose Tests

We will comply with the intent of this section. At this time, these procedures have not been developed. Upon their completion, we will compare them to Appendix R guidelines to insure compliance.

Section III F, Automatic Fire Detection

We do not fully comply with this section. References (2) and (3) list where we do comply and our basis for this.

Section III G, Fire Protection of Safe Shutdown Capability

We comply with the intent of this section subject to the exemptions requested in Reference 3.

Section III H, Fire Brigade

We will comply with the intent of this section subject to a possible exemption request with reference to the necessity that "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 staffing of the Fire Brigade has not yet been established beyond the acknowledgment that it will contain five people and the shift supervisor will not be a member. Once we have decided upon the staffing, we will compare it to Appendix R for compliance and discuss the need for an exemption with you.

Section III I, Fire Brigade Training

We will comply with the intent of this section. See Reference 1, Section 13.2.1.1e.

Section III J, Emergency Lighting

We will comply with the intent of this section. See Reference 2, Page F-88.

Section III K, Administrative Controls

We will comply with the intent of this section after plant operation. Administrative control procedures dealing with this have not yet been developed. After development, we will compare them to the detail of Appendix R for compliance.

Section III L, Alternative and Dedicated Shutdown Capability

We will comply with the intent of this section subject to any exceptions noted in Reference 3.

Section III M, Fire Barrier Cable Penetration Seal Qualification

Cable penetration seal qualification will meet the intent of the requirements of the Standard Review Plan.

Section III N, Fire Doors

We will comply with the intent of this section.

Section III O, Oil Collection System for Reactor Coolant Pump

We will comply with the intent of this section for Unit 1. As you are aware, studies are currently underway on development of a fire retardent lubricating fluid for Reactor Coolant Pumps. If this lubricating fluid is available for use in the future, we will possibly request an exemption from this section for Unit 2.

ATTACHMENT