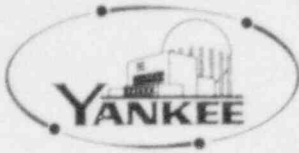


# YANKEE ATOMIC ELECTRIC COMPANY

Telephone 617 872-8100



1671 Worcester Road, Framingham, Massachusetts 01701

2.C.2.1  
FYR 82-50

May 13, 1982

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

Attention: Office of Nuclear Reactor Regulation  
Mr. D. G. Eisenhower, Director  
Division of Licensing

References: (a) License No. DPR-28 (Docket No. 50-271)  
(b) USNRC Letter to All Power Reactor Licensees with Plants  
Licensed Prior to January 1, 1979, dated February 20, 1981  
(Generic Letter 81-12)

Subject: Request for Exemption

Dear Sir:

The purpose of this letter is to request an exemption from the requirements of Appendix R, Section III.G.3.6, last sentence, with reference to the Control Room. Yankee interprets this sentence to require installation of both fire detection and fixed fire suppression systems in the Control Room even though we have the capability to shut down the plant from outside the Control Room.

Yankee believes that it is neither prudent nor necessary to install a fixed suppression system in the Control Room and hereby requests an exemption from the requirement in accordance with 10CFR50.12. Our basis for such an exemption is outlined as follows:

1. The Control Room is a continually manned area, thus aiding in the quick detection of any fire.
2. Smoke detectors are provided throughout the room and inside control cabinets.
3. All electrical penetrations into the room are sealed. Fire dampers have been provided on ventilation lines.
4. The fire loading in the Control Room is low. There is strict control over the use of any flammable materials. The problem with transient combustibles is low, as there is no need for them to go through the Control Room.
5. Portable extinguishers within the Control Room provide sufficient capability to handle any incipient fire. Fire hoses and additional extinguishers are available outside the Control Room if they are needed.

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6. The installation of a fixed suppression system could decrease overall safety rather than increase it. Inadvertent operation of any known suppressant, including Halon 1301, could cause equipment damage as in the case of water or make it necessary for personnel to evacuate the room, as in the case of CO<sub>2</sub> and Halon.

We believe that the information provided above forms an adequate basis for our request for exemption. We trust that this information will allow you to act on our request in a timely fashion. If you have any need for further information, please contact us.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY

*J. A. Kay*  
J. A. Kay

Senior Engineer - Licensing

JAK:dad