



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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Dalwyn R. Davidson  
VICE PRESIDENT  
SYSTEM ENGINEERING AND CONSTRUCTION

May 6, 1982

Mr. A. Schwencer  
Chief, Licensing Branch No. 2  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Perry Nuclear Power Plant  
Docket Nos. 50-440; 50-441  
Revised Responses -  
Fire Protection

Dear Mr. Schwencer:

This letter and its attachment is submitted to provide revised responses to the concerns identified in your request for Fire Protection.

It is our intention to incorporate these responses in a subsequent amendment to our Fire Protection Evaluation Report.

Very Truly Yours,

Dalwyn R. Davidson  
Vice President  
System Engineering and Construction

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Question Topic 26:

Comparison of PNPP's fire protection program to the guidance set forth in 10 CFR 50, Appendix R.

Response

Appendix R  
Section

PNPP Position

II.A,  
Fire Protection Program

Comply; see Perry Nuclear Power Plant Fire Protection Evaluation Report (PNPP-FPER) Pages 5-2 through 5-6. PNPP will follow the fire protection program outlined in the NRC staff supplemental guidance "Nuclear Plant Fire Protection Functional Responsibilities, Administrative Controls and Quality Assurance," dated August 29, 1977.

II.B,  
Fire Hazards Analysis

Comply; see PNPP-FPER Section 4.0. The results of PNPP's analysis to assure fire protection for safe shutdown capability, which were presented in an April 30, 1982 meeting with NRC(CHEB), will appear in the next amendment to the PNPP-FPER.

II.C  
Fire Protection Features

Comply; see PNPP-FPER and PNPP-FSAR Sections 9.5.1 and 13.1.

II.D  
Alternative or Dedicated  
Shutdown Capability

Comply; see written commitments in letter of April 1, 1982, to A. Schwencer from D. R. Davidson, as modified by verbal commitments made by CEI in an April 26, 1982, meeting with CHEB.

III.A  
Water Supplies for Fire  
Suppression Systems

Comply; Lake Erie is the source of fire protection water for PNPP. There are two structures which supply this water to the emergency service water pump house where the fire pumps are located. During normal operation, lake water will be supplied to the pumps through the intake tunnel. Should the intake tunnel become obstructed, an alternate source of this lake water supply is available through the discharge tunnel. For a detailed description of these dual intakes see FSAR section 3.8.4.1.9.

III.B  
Sectional Isolation Valves

Comply; All fire hydrants at PNPP are provided with a lateral which contains a key operated valve so that the hydrant may be isolated for maintenance and repair.

III.D  
Manual Fire Suppression

Will comply; Standpipe and hose systems at PNPP are so installed that at least one effective hose stream will be able to reach any location that contains or presents an exposure fire hazard to structures, systems, or components important to safety. Standpipe and hose stations are located inside of containment, but not inside drywell. However, adequate lengths of hose shall be provided to reach any location inside the dry well with an effective hose stream. The water supply for the standpipe and hose stations inside of containment is the normal fire service water supply.

III.E  
Hydrostatic Hose Tests

Will comply; fire hose will be hydrostatically tested per Appendix R criteria

III.F.

Automatic Fire Detection

Will comply or will submit request for exemption from Appendix R, Section III F, recommendations for automatic fire detection for specific areas based on results of the recently completed safe shutdown analysis. Automatic fire detection is currently provided based on the results of the fire hazards analysis presented in Section 4.0 of the PNPP-FPER.

III.G

Fire Protection of Safe Shutdown Capability

Will comply or will justify deviations which will nonetheless provide equivalent fire protection for redundant cables and equipment as agreed to by NRC and CEI in an April 26 meeting on Section III.G compliance.

III.H

Fire Brigade

Will comply.

III.I

Fire Brigade Training

Will comply.

III.J.

Emergency Lighting

Will comply.

III.K

Administrative Controls

Will comply.

III.L

Alternative and Dedicated Shutdown Capability

Compliance with this requirement was discussed in the April 26 meeting between NRC and CEI on the analysis performed to evaluate compliance of PNPP design with Section III.G criteria. Also, for the fire in the control room, loss of two of the four Reactor Protection System cabinets does not prevent loss of function of the manual SCRAM. Loss of two of these cabinets, although unlikely, is postulated because there is only 4.5 feet between the cabinets in each pair

control room due to fire, procedures will require opening the breakers to the RPS logic to assure that electrical power is removed from the scram inlet and discharge solenoids.

Should a fire in the control room disable the diesel generator starting panel, operator action would be required at the diesel generator room to transfer control to the local panel. The control room circuits are isolated after control is transferred to the local panel.

### III.M

Fire Barrier Cable Penetration  
Seal Qualification

Will comply.

### III.O

Oil Collection System for  
Reactor Recirculation Pump

Do not comply; a lube oil fire hazard for the reactor recirculation pumps does not require an oil collection system since the pump motor lube oil systems are contained within a metal housing and the pump is water lubricated and cooled; thus, an engineered oil leak collection system for the reactor recirculation pump is not necessary.

III.L  
Alternate and Dedicated  
Shutdown Capability

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of cabinets. There is over 27 feet between each pair of cabinets. Additionally, upon evacuation of the control room due to fire, procedures will require opening the breakers to the RPS logic to assure that electrical power is removed from the scram inlet and discharge solenoids.

Should a fire in the control room disable the diesel generator starting panel, operator action would be required at the diesel generator room to transfer control to the local panel. The control room circuits are isolated after control is transferred to the local panel.

III.M  
Fire Barrier Cable Penetration  
Seal Qualification

Will comply.

III.O  
Oil Collection System for  
Reactor Recirculation Pump

Do not comply; a lube oil fire hazard for the reactor recirculation pumps does not require an oil collection system since the pump motor lube oil systems are contained within a metal housing and the pump is water lubricated and cooled; thus, an engineered oil leak collection system for the reactor recirculation pump is not necessary.