



Wisconsin Electric POWER COMPANY
231 W. MICHIGAN, P.O. BOX 2046, MILWAUKEE, WI 53201

June 30, 1982

Mr. H. R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. NUCLEAR REGULATORY COMMISSION
Washington, D. C. 20555

Attention: Mr. R. A. Clark, Chief
Operating Reactors Branch 3

Gentlemen:

DOCKET NOS. 50-266 AND 50-301
ADDITIONAL INFORMATION - GENERIC LETTER 81-12
FIRE PROTECTION MODIFICATIONS
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

This letter and enclosure provide additional information in response to Generic Letter 81-12 dated February 20, 1981. The submittal of this information is in accordance with the schedule requirements of Exemption No. 1 contained in Enclosure 1 to your May 4, 1982 letter granting schedular exemptions for certain of the Appendix R requirements.

Enclosure 1 to this letter provides the complete results of our reassessment of Point Beach Nuclear Plant. Information which was submitted with our March 31, 1982 letter is repeated in the enclosure in order to provide one complete submittal. All plant areas have been reevaluated with respect to hot shutdown requirements, cold shutdown requirements, and associated circuits.

As part of the reassessment, we have determined that redundant hot shutdown circuits and equipment are located in some areas of Point Beach Nuclear Plant which are not in strict verbatim compliance with the specific requirements of 10 CFR 50, Appendix R, Section III.G.2. These areas are as follows:

1. Fire Zone 1 - Unit 1 Motor Control Center Room.
2. Fire Zone 2 - Safety Injection, Containment Spray Pump Room.

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3. Fire Zone 3 - Component Cooling Water Pump Room.
4. Fire Zone 4 - Unit 2 Motor Control Center Room.
5. Fire Area 5 - Auxiliary Feedwater Pump Room.
6. Fire Area 6 - 4160V Switchgear Room.
7. Fire Zone 7 - Monitor Tank Room.
8. Fire Area 8 - Cable Spreading Room.
9. Fire Area 9 - Control Room.
10. Fire Zone 10 - Unit 1 Containment, Southeast Quadrant.
11. Fire Zone 11 - Unit 2 Containment, Southeast Quadrant.

A rigorous fire hazards analysis has been performed for each of the above-listed plant areas. Each of these analyses show that, with certain additional modifications in some areas, an acceptable configuration can be achieved which provides adequate fire protection. These analyses provide justification for an exemption from the requirements of Appendix R, Section III.G.2, in accordance with 10 CFR Part 50.48, Paragraph (c)(6). The area description, proposed modifications, fire hazards analysis, and technical basis for an exemption for each listed plant area are contained in Section 5 of Enclosure 1. The analyses for cold shutdown requirements and associated circuits are contained in Section 3 of Enclosure 1.

Based upon the results of the analyses in Section 5 of Enclosure 1, we request the following substantive exemptions from the requirements of Appendix R, Section III.G.2, per the provisions of 10 CFR 50.43(c)(6) and 10 CFR 50.12. Specifically, Wisconsin Electric Power Company requests that:

1. Fire Zone 1 (Unit 1 Motor Control Center Room) be exempted from the 20-foot horizontal separation and the automatic fire suppression system requirements of Section III.G.2.b.
2. Fire Zone 2 (Safety Injection, Containment Spray Pump Room) be exempted from the 20-foot horizontal separation and the automatic fire suppression system requirements of Section III.G.2.b.

3. Fire Zone 3 (Component Cooling Water Pump Room) be exempted from the 20-foot horizontal separation and the automatic fire suppression system requirements of Section III.G.2.b.
4. Fire Zone 4 (Unit 2 Motor Control Center Room) be exempted from the 20-foot horizontal separation and the automatic fire suppression system requirements of Section III.G.2.b.
5. Fire Area 5 (Auxiliary Feedwater Pump Room) be exempted from the 20-foot horizontal separation requirement of Section III.G.2.b.
6. Fire Area 6 (4160V Switchgear Room) be exempted from the 20-foot horizontal separation requirement of Section III.G.2.b.
7. Fire Zone 7 (Monitor Tank Room) be exempted from the 20-foot horizontal separation and automatic fire suppression system requirements of Section III.G.2.b.
8. Fire Area 8 (Cable Spreading Room) be exempted from the 20-foot horizontal separation requirement of Section III.G.2.b.
9. Fire Area 9 (Control Room) be exempted from the 20-foot horizontal separation or fire-rated barrier and the automatic fire suppression system requirements of Section III.G.2.b.
10. Fire Zone 10 (Unit 1 Containment, Southeast Quadrant) be exempted from the 20-foot horizontal separation, automatic fire suppression, and/or radiant energy shield requirements of Sections III.G.2.d, e, and f.
11. Fire Zone 11 (Unit 2 Containment, Southeast Quadrant) be exempted from the 20-foot horizontal separation, automatic fire suppression, and/or radiant energy shield requirements of Sections III.G.2.d, e, and f.

We also request that the schedule requirements for implementing the modifications proposed in Section 5 of Enclosure 1 for the above areas be tolled until final Commission action on the above-listed requests for exemption in accordance with 10 CFR Part 50.48, Paragraph (c)(6).

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We anticipate that the modifications proposed for fire areas/zones 1 through 9 can be implemented within nine months following granting of the requests for exemption in accordance with the requirements of 10 CFR Part 50.48, Paragraph (c)(2).

We anticipate that the modifications proposed for fire zones 10 and 11 can be implemented in accordance with the scheduler requirements of 10 CFR Part 50.48, Paragraph (c)(3), following granting of the requests for exemption.

Exemption No. 2 in Enclosure 1 to your May 4 letter granted a time extension to June 30, 1982 for submittal of design descriptions of modifications needed to satisfy Section III.G.3 of Appendix R. Our reassessment has shown that the provision of alternate shutdown capability in accordance with Section III.G.3 would not benefit plant safety and is not required for any area of Point Beach Nuclear Plant.

Exemption No. 3 in Enclosure 1 to your May 4 letter requires implementation of modifications required by Appendix R, Section III.F, by June 30, 1982. Section III.F requires automatic fire detection systems to 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. We have met this requirement with the following clarifications:

1. Automatic fire detection cannot be installed in the north wing of the auxiliary building elevation 26'-0" until completion of certain post-TMI modifications. This building section is largely open area in which post-TMI-2 battery and inverter rooms will be located. Five of the seven smoke detectors to be provided in this building section will be installed in the newly constructed rooms. Installation of these seven detectors will proceed following the completion of construction. This building section is in compliance with all other applicable requirements of Appendix R and does not contain any safe shutdown required components. The only safety-related equipment in this building section is the Unit 2 volume control tank which is located in a separate room. The open area and construction activities do not present an exposure fire hazard to this equipment.
2. The Point Beach fire detection system description contained in Enclosure 1, Section 2.2.2, to this letter indicates that all fire detection and fire protection systems will be incorporated into common

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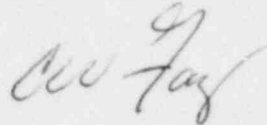
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control and alarm panels. We anticipate that the remaining work will be completed by September 30, 1982. However, the fire detection system in safe shutdown and safety-related areas, including control room annunciation, is operational.

The reactor coolant pump lube oil collection system required by Appendix R, Section 0, was installed in Unit 2 during the spring 1982 refueling outage. We anticipate installation of this system in Unit 1 during the fall 1982 outage. This is in accordance with Exemption No. 4 contained in Enclosure 1 to your May 4 letter.

Please advise us if you have any questions regarding this submittal.

Very truly yours,

A handwritten signature in cursive script, appearing to read "C. W. Fay".

Assistant Vice President

C. W. Fay

Enclosure

Copy to NRC Resident Inspector

