

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

September 22, 1983

Director of Nuclear Reactor Regulation
Attention: Ms. E. Adensam, Chief
Licensing Branch No. 4
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Ms. Adensam:

In the Matter of)	Docket Nos. 50-327
Tennessee Valley Authority)	50-328

Please refer to your letter to H. G. Parris dated June 6, 1983 concerning several unresolved fire protection issues at the Sequoyah Nuclear Plant, units 1 and 2. Enclosed is our response to the suggested resolutions listed as items 1, 2, and 3 on your transmittal letter.

If you have any questions concerning this matter, please get in touch with K. P. Parr at FTS 858-2685.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills
L. M. Mills, Manager
Nuclear Licensing

Sworn to and subscribed before me
this 22nd day of Sept. 1983

Bryant M. Lawery
Notary Public
My Commission Expires 4/8/86

Enclosure

cc: U.S. Nuclear Regulatory Commission (Enclosure)
Region II
Attn: Mr. James P. O'Reilly, Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30303

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ENCLOSURE

NRC's Position - Items 1a and 1b

Technical Specifications for Units 1 and 2 need to be amended in the near future to include (a) the frequency of fire hazards training; drills shall be held at least once per 92 days, and (b) nonsupervised fire protection system circuitry shall be demonstrated operable at least every 31 days. These two revisions are consistent with NUREG-0452.

TVA's Response - Item 1a

TVA has recognized the necessity of quarterly fire brigade drills as an inherent feature of an effective fire brigade. TVA's requirements for fire brigade training, including quarterly drills, are found in division level and plant level procedures. These procedures are consistent with fire brigade drill requirements as found in 10 CFR 50 Appendix R and the Branch Technical Position 9.5-1.

Therefore, TVA feels that effective and appropriate controls for fire brigade drill frequency are currently in place and incorporating such a frequency in the Sequoyah Technical Specifications is unnecessary and unwarranted.

TVA's Response - Item 1b

NUREG-0452 in reference to nonsupervised fire detection circuits states that the nonsupervised circuits, associated with detector alarms, between the instruments and the control room, shall be demonstrated operable at least once per 31 days. Technical specification section 4.3.3.8 addresses fire detection instrumentation and the surveillance requirements are directed at verifying capability of performing this function. This is substantiated in the bases for 4.3.3.8 which states that operability of the fire detection instrumentation ensures that adequate warning capability is available for the prompt detection of fires. This is required in order to detect and locate fires in their early stages to reduce the potential for damage to safety-related equipment. If portions of the fire detection system are inoperable, fire watch patrols in the affected areas are required to provide this detection capability.

The referenced NUREG-0452 requirement applies to fire detection functions, based upon the above, and does not address system actuation functions. The same requirement states specifically that the circuits involved are those between the instruments and the control room. As noted in our response to the NRC's question number 7 on the Fire Protection Program Reevaluation, revision 4, the circuitry between the instruments and the control room is electronically supervised for ground and open wiring faults at Sequoyah Nuclear Plant. On this basis, this is a specific inspection requirement and should not be generically applied. Sequoyah Nuclear Plant is in full compliance with the intent of NUREG-0452, section 4.3.3.8.3.