

Donald C. Shelton
Vice President - Nuclear
Davis-Besse

300 Madison Avenue
Toledo, OH 43652-0001
(419) 249-2300

Docket Number 50-346

License Number NPF-3

Serial Number 1914

April 16, 1991

United States Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555

Subject: Fire Protection - Revised National Fire Protection
Association Code Compliance for Corridors 209 and 304

Gentlemen:

On July 26, 1979, the Nuclear Regulatory Commission (NRC) issued Davis-Besse Nuclear Power Station (DBNPS) Technical Specification (TS) License Amendment Number 18 (Toledo Edison (TE) letter Log Number 409). Table 1 of the Safety Evaluation Report (SER) that accompanied TS Amendment 18 listed the fire protection system upgrades which TE was to implement. Included in Table 1 of the SER was a requirement to provide sprinkler protection in Corridors 209 and 304 in order to protect safe shutdown circuits located in those corridors. SER Table 1 also noted that "...the systems are in accordance with the applicable portions of the NFPA Codes..."

The following information discusses the basis for this SER requirement. TE's commitment to install sprinklers in Corridors 209 and 304 was discussed in the Fire Hazards Analysis Report (FHAR), Revision 3, Sections 5.H.6 and 5.V.6 (submitted to the NRC on September 25, 1978, as TE letter Serial Number 460), which stated that for both Corridors 209 and 304 "... a fire originating in a cable tray is not credible. Based on this rationale, a sprinkler system for the purpose of spraying the trays is not going to be incorporated into the design." FHAR, Revision 3 also stated that both Corridors 209 and 304 "...will be protected against an exposure fire by an automatic wet pipe-type sprinkler system..." and that the sprinkler piping will be sized hydraulically in accordance with the requirements of National Fire Protection Association (NFPA) 13. On October 3, 1978, the NRC sent TE a letter (TE letter Log Number 358) documenting the results of a September 1978 TE-NRC meeting on fire protection issues. This letter acknowledged that sprinklers were to be provided in Corridor 209 to protect against an exposure fire and in Corridor 304 to protect the aisleway in front of the panels. This commitment was then included in

220064

Operating Companies
Cleveland Electric Illuminating
Toledo Edison

9104230004 910416
PDR ADDCK 05000346
P PDR

ADD6 11

Docket Number 50-346
License Number NPF-3
Serial Number 1914
Page 2

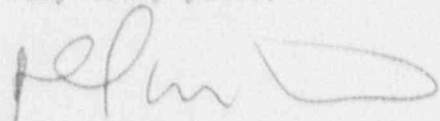
Table 1 of the SER. The sprinklers were installed, providing the sprinkler protection (including hydraulic sizing in accordance with NFPA-13) as committed, however, they were not installed in accordance with NFPA-13, Section 4-3.1 and 4-2.4.6 guidance on sprinkler location. Toledo Edison committed in a letter dated May 23, 1988 (TE letter Serial Number 1497) to relocate those sprinklers that significantly departed from the NFPA-13 sprinkler location guidance.

As a result of further review by TE, the PHAR, Revision 12, (submitted to the NRC in TE letter Serial Number 1854 dated November 8, 1990) does not require sprinkler protection of circuits within either Corridor 209 or Corridor 304 in order to achieve a safe shutdown. In that the sprinklers presently installed in Corridors 209 and 304 meet the original commitment as required in SER Table 1, modifications solely to achieve compliance with the NFPA-13 sprinkler location guidance are not warranted and would not provide any significant safety benefit.

Accordingly, TE is revising the commitment made in its May 23, 1988, letter to exclude the upgrading of sprinklers in Corridors 209 and 304 in order to meet the sprinkler location guidance of NFPA-13.

If you should have any questions, please contact Mr. R. W. Schrauder, Manager - Nuclear Licensing, at (419) 249-2366.

Very truly yours,



KBR/mbb

cc: P. M. Byron, DB-1 NRC Senior Resident Inspector
A. B. Davis, Regional Administrator, NRC Region III
J. R. Hall, NRC Senior Project Manager
M. D. Lynch, NRC Senior Project Manager
Utility Radiological Safety Board