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Radford J. Converse  
Resident Manager

July 31, 1991  
JAFP-91-0455

United States Nuclear Regulatory Commission  
Document Control Desk  
Mail Station P1-137  
Washington, D.C. 20555

Subject: JAMES A. FITZPATRICK NUCLEAR POWER PLANT  
DOCKET NO. 50-333  
APPENDIX R TO 10 CFR 50 EXEMPTION REQUEST FOR AREA  
WIDE DETECTION IN THE TURBINE BUILDING

Dear Sirs:

In accordance with the provisions of 10 CFR 50.12, the New York Power Authority requests exemption from the requirements of Sections III.G.3 of Appendix R to 10 CFR 50 as they apply to the James A. FitzPatrick Nuclear Power Plant. The exemption request concerns fire detection in the Turbine Building.

Turbine Building Area (Fire Zone 1E)

Section III.G.3.b of Appendix R to 10 CFR 50 requires "fire detection and a fixed fire suppression system ... in the area, room, or zone under consideration" where electrical circuits "associated" with alternative or dedicated shutdown could prevent operation of equipment required for hot shutdown.

The Authority has recently determined that a fire in either the FitzPatrick Control Room or Turbine Building could prevent operation of the East and West Electric Bay Ventilation Unit Cooler Fans because of circuits "associated" with these fans. Equipment required for safe shutdown in the electrical bays may over-heat and become inoperable if the fans do not operate. Modifications have been installed to assure that these fans will operate. However, a fire detection system is not currently installed "in the area, room, or zone under consideration".

As an interim compensatory measure, the Authority will post a continuous fire watch in the area. Individuals standing fire watch will be trained how to use a portable fire extinguisher.

The Authority requests exemption from the requirements of Section III.G.3 of Appendix R to 10 CFR 50 to the extent that a fire detection system is required within the turbine building.

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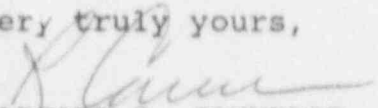
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A detailed description, engineering assessment and technical justification for this exemption request is included in Attachment I.

If you have any questions, regarding either of these exemption requests, please contact Mr. J. A. Gray, Jr.

Very truly yours,

  
RADFORD J. CONVERSE  
RESIDENT MANAGER

RJC:JE:mac

Attachment

cc: U.S. Nuclear Regulatory Commission  
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