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WILLIAM D. HARRINGTON
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February 22, 1985

BECO 85-037

Mr. Hugh L. Thompson Jr, Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

License DPR-35
Docket 50-293

Subject: Compliance with Fire Protection Requirements
Including Appendix R - Generic Letter 85-01

Reference: 1) Federal Register Vol. 50, No. 10 dated 1/15/85,
"Availability of NRC Fire Protection Policy
Steering Committee Report for Comment

Dear Sir:

The NRC Staff requested by Reference (1), public comment on the recommendations made by the Fire Protection Policy Steering Committee for expediting compliance with the fire protection requirements. The comment period is due to expire on February 14, 1985

Boston Edison (BECO) received the Generic Letter 85-01 dated January 9, 1985, which is a part of Reference (1), on January 22, 1985. We wish to state that the time available to review the Generic Letter 85-01 is not adequate for a complete and thorough review. We do request an extension of 30 days to the comment period from February 14, 1985.

Based upon a preliminary review of the Generic Letter, BECO offers the following comments:

1. With regard to the recommendation of the Steering Committee "to grant no further extensions to the 50.48(c) schedule" and the statement that "Licensees submitting living schedules for NRC approval should be aware that existing 50.48 schedules continue to apply", Boston Edison wishes to point out that it has an NRC approved "living schedule" called the Long Term Plan (LTP). The Living schedule utilizes a relative ranking system for implementation of modifications based upon safety significance and resource allocation. Accordingly, fire protection modifications are scheduled to be completed by the end of the Refueling Outage #7, currently scheduled for the latter part of 1986. To deviate from this presumption would jeopardize licensees' currently approved Long Term Plans. The Steering Committee recommendation to follow the schedule dictated by 10 CFR 50.48 without granting the extensions already filed with the NRC will make the fire protection modifications the highest priority. This will preclude the evaluation of other safety issues which could be equal or higher in safety priority than fire protection.

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BOSTON EDISON COMPANY

Mr. Hugh L. Thompson Jr., Director
February 22, 1985
Page 2

2. Item 3.6.2 of Enclosure 5, clarification of noncombustible material, your staff states that "Cables that are in covered cable tray should also be considered as intervening combustibles". An intervening combustible is only critical from the point of view of propagation of a fire from one safety division to its redundant counterpart. Cables in an enclosed tray could never be a propagating medium. Besides, they are supposed to be designed with fire stops.
3. Section 4.1, "Illumination Levels", the clarification states "where a licensee has provided emergency lighting per Section III.J of Appendix R, we would expect that the licensee verify by field testing that this lighting is adequate to perform the intended tasks". The term "adequate lighting" could be interpreted differently by the licensee and the NRC inspection staff.
4. Item 7.1 of Enclosure 5 clarifies the guidelines for the seismic design of fire protection systems in relation to the reactor coolant pump lube oil system, and those situations where seismic events are assumed to be initiators of a fire. The NRC response does not address the intent of the question but establishes guidelines for the seismic design of fire protection systems. Boston Edison takes exception to this clarification and states that a seismic event is not considered concurrent with a fire and the fire protection systems are not seismically designed.

If a 30 day extension to the comment period is granted, Boston Edison will be able to provide more detailed comments on the Generic Letter 85-01.

Very truly yours,

WD Harrington

TAV/kmc