

**NORTHEAST UTILITIES**

THE CONNECTICUT LIGHT AND POWER COMPANY  
WESTERN MASSACHUSETTS ELECTRIC COMPANY  
HOLYOKE WATER POWER COMPANY  
NORTHEAST UTILITIES SERVICE COMPANY  
NORTHEAST NUCLEAR ENERGY COMPANY

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April 30, 1985

Docket No. 50-423

B11494

Director of Nuclear Reactor Regulation  
Mr. B. J. Youngblood, Chief  
Licensing Branch No. 1  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

- References:
- (1) B. J. Youngblood letter to W. G. Council, SER for Millstone Nuclear Power Station, Unit No. 3, dated August 2, 1984.
  - (2) W. G. Council letter to B. J. Youngblood, NRC-CMEB Review Meeting (May 10, 1984), dated October 9, 1984.
  - (3) A telecon between NRC and NNECO representatives dated March 17, 1985.

Dear Mr. Youngblood:

Millstone Nuclear Power Station, Unit No. 3  
SER Open Item 14.10, Cable Spreading Room Protection

The acceptability of installed fire protection features for the Millstone Unit 3 cable spreading room is currently an open item on the Millstone Unit 3 docket. (See Reference 1, open item 14.10.) The open item relates specifically to the acceptability of an automatic, multiple discharge, total flooding CO<sub>2</sub> system in lieu of a water sprinkler system as recommended by BTP CMEB 9.5-1, Section C.7.c. The history of this issue is well documented in the substantial correspondence between the NRC Staff and Northeast Nuclear Energy Company (NNECO). (See Reference 2.)

It is now our understanding that the only information needed by the Staff to reach a decision on NNECO's request for a deviation from the provisions of BTP CMEB 9.5-1, Section C.7.c regarding this issue are (1) the configuration of the cable spreading room as it relates to access for manual fire fighting capabilities,<sup>(1)</sup> (2) adequacy of hose stream coverage in the cable spreading room

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- (1) This position is consistent with the reported results of a January 29, 1985 NRC meeting of nationally recognized fire protection experts who unanimously concurred that if alternative shutdown capability was provided and acceptable manual fire fighting capability was present in a cable spreading room, a CO<sub>2</sub> system designed in accordance with the intent of appropriate NFPA codes would be acceptable. NNECO has previously stated that (1) shutdown capability independent of the cable spreading room was available and (2) the CO<sub>2</sub> system was designed in accordance with the applicable guidelines of NFPA-12, American Nuclear Insurers (ANI), and the NRC Staff's BTP CMEB 9.5-1, Section C.6.e. (See, e.g., Reference 2, Attachment 1 at FP 19-1 and FP 19-5.)

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and (3) the potential for damage from water draining from the cable spreading room (Reference 3). Accordingly, this information is attached hereto for Staff review. Significantly, on November 28, 1984, NRC Staff fire protection personnel toured the Millstone Unit 3 cable spreading room, and their observations will undoubtedly support the conclusion that the cable spreading room has adequate manual fire fighting accessibility.

We trust that with this information, favorable action can be taken on NNECO's request for deviation as noted above. To the extent that the NRC Staff needs additional information on this issue or proposes to deny this deviation request, NNECO respectfully requests a meeting with appropriate NRR management to review this issue.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY  
et. al.

BY NORTHEAST NUCLEAR ENERGY COMPANY  
Their Agent

W. G. Council  
W. G. Council  
Senior Vice President

J. F. Opeka  
By: J. F. Opeka  
Vice President

cc: Dr. William V. Johnston

STATE OF CONNECTICUT       )  
                                      ) ss. Berlin  
COUNTY OF HARTFORD       )

Then personally appeared before me J. F. Opeka, who being duly sworn, did state that he is Vice President of Northeast Nuclear Energy Company, an Applicant herein, that he is authorized to execute and file the foregoing information in the name and on behalf of the Applicants herein and that the statements contained in said information are true and correct to the best of his knowledge and belief.

Lorraine J. D'Amico  
Notary Public

My Commission Expires March 31, 1988

## ATTACHMENT

### Cable Spreading Room: Capability for Manual Fire Fighting

#### 1. Pertinent Design Considerations

- a. Size: 100 feet by 115 feet
- b. Ceiling Height: 23 feet
- c. Entrances: 2 entrances well separated  
(1 along the east wall and 1 along the west wall)
- d. Hose Stations: Hose stations have been strategically located within the cable spreading room/adjacent areas to assure good fire-fighting capability.

#### 2. Accessibility

The cable spreading room has been designed to allow manual fire-fighting operations to be effective in extinguishing a fire within the area. Access and egress routes within the room are well defined. Tray arrangement/separation coupled with expertise of the fire brigade and the available fire-fighting equipment will allow the fire brigade ample time to effectively control and extinguish any postulated fire which could occur within the cable spreading room.

#### 3. Drainage

Drainage to accommodate fire-fighting water has not been provided for in the cable spreading room due to the fact that a gas suppression (CO<sub>2</sub>) system has been provided. However, in order to prevent water damage, flood seals have been installed at floor penetrations. In addition, curbing at doorways has been provided, or alternate drainage paths have been established to preclude fire-fighting water from effecting adjacent safety-related areas.

#### 4. Conclusion

The accessibility to the Millstone Unit 3 cable spreading room will not hamper manual fire-fighting capabilities. Further, drainage from the cable spreading room will not adversely impact safe shutdown of the plant.