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V. S. BOYER
SR. VICE PRESIDENT
NUCLEAR POWER

May 8, 1985

Docket Nos. 50-277
50-278

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

SUBJECT: Peach Bottom Atomic Power Station
Fire Protection - Fire Dampers

REFERENCE: (1) Letter from V. S. Boyer to D. G. Eisenhut dated December 2, 1983

(2) Letter from V. S. Boyer to D. G. Eisenhut dated September 17, 1984

(3) Letter from V. S. Boyer to D. G. Eisenhut dated January 16, 1985

Dear Mr. Thompson:

This letter identifies our plans for completing the installation of three-hour qualified fire dampers in ventilation ducts penetrating safe shutdown fire barriers. The following tabulation provides a status of the fire damper program:

	Unit 3	Unit 2	Common	Total
Total	44	46	60	150
Qualified	11	8	15	34
Complete	10	5	17	32
Exemption	17	20	22	59
To Do	6	13	6	25

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The obstacles hampering damper installation are as follows:

1. Unanticipated radiation contamination of ductwork has almost doubled installation time. Ductwork which serviced very low level radiation areas has become slightly contaminated over the years. Work in some of these ducts now requires not only Anti-C clothing, but also the use of portable HEPA filter units and enclosures around the work area.

2. The increase in the time required to install dampers in contaminated ductwork has resulted in longer outage periods of the associated ventilation systems. This has raised concerns about the lack of cooling for areas containing vital equipment such as the battery rooms and emergency switchgear rooms. Consequently, the plant engineering staff has been required to perform time consuming investigations regarding the effect of long-term HVAC outages on the vital equipment and the development of alternative cooling measures. These investigations also revealed that in several areas, the HVAC outages and associated damper work had to be deferred until the next plant outage to avoid overheating of vital equipment.

3. An engineering analysis on a case-by-case basis has been found necessary because of interferences associated with each damper installation, such as conduit and ductwork penetrating the same blockout, resulting in additional modifications in order to facilitate damper installation.

We proposed in the Reference (3) letter to complete damper work by the end of the current Unit 2 outage, now estimated as the second week in June. Because of continued installation problems, we will not meet the completion date. We propose to provide fire watches, prior to the resumption of full power operations on Peach Bottom Unit 2, in accordance with plant Technical Specifications until the installation program is complete.

Technical Specifications require that either a continuous fire watch be established on one side of the affected barrier, or that the operability of fire detectors on at least one side of the inoperable fire barrier be verified and an hourly fire watch patrol be established. Compliance with this Technical Specification will assure that a fire condition is recognized and appropriate actions taken rapidly.

We will continue to install fire dampers as expeditiously as possible and report the damper installation status in our fire protection modifications progress reports which we have been submitting since May 27, 1983.

Very truly yours,

V. S. Boyer

cc: Dr. T. E. Murley, Administrator, Region I
T. P. Johnson, Resident Site Inspector