



May 31, 1985

Public Service of New Hampshire

NEW HAMPSHIRE YANKEE DIVISION

SBN- 799
T.F. B4.2.7

United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Attention: Mr. Stewart D. Ebnetter, Director
Division of Reactor Safety

References: (a) Construction Permits CPPR-135 and CPPR-136, Docket
Nos. 50-443 and 50-444

(b) USNRC Letter, dated 5/3/85, "Inspection Report
No. 50-443/85-06

Subject: Response to Inspection Report No. 50-443/85-06

Dear Sir:

It was reported in the subject Inspection Report that certain of our activities were not conducted in accordance with commitments in the FSAR. In response to the reported FSAR deviations, we offer the following:

Notice of Deviation 50-443/85-06-02

As a result of the inspection conducted on February 25-March 1, 1985 and in accordance with NRC Enforcement Policy (10 CFR 2, Appendix C) published in the Federal Register on March 8, 1984 (49 FR 8583), the following deviation was identified:

FSAR Section 9.5.1.1 states that equipment used in the Fire Protection System is either Underwriters Laboratories Listed (UL) or Factory Mutual (FM) approved for fire protection service.

Contrary to the above, as of February 26, 1985, non UL Listed/FM approved valves have been specified and installed in the Fire Protection System, specifically the fire hydrant isolation valves and underground gate valves.

Response

The procurement and installation specifications, for Fire Protection (FP) System components, have been reviewed to determine components which are not specified to be UL Listed and/or FM Approved. The items which were not specified to be UL Listed and/or FM Approved are fire hydrant isolation valves, hydrant valves, and fire hydrants. The installed fire hydrants were visually inspected and found to be UL Listed and FM Approved. Visual inspection of the hydrant valves determined that they are UL Labeled.

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The procured hydrant isolation valves are Pratt "Groundhog" butterfly valves specified to AWWA C504, Class 150 with a 200 psi working pressure. The Pratt "Groundhog" and UL/FM butterfly valves are essentially the same with the following exceptions:

- 1) Standard AWWA butterfly valves tend to close on their own, while UL/FM butterfly valves are designed to maintain their open position. The "Groundhog" butterfly valves were procured with a MDT operators which will hold the standard AWWA valve open.
- 2) The AWWA butterfly valves are leak tight to 150 lbs. while UL/FM butterfly valves have a higher pressure rating. The Fire Protection System is designed for 125 psi working pressure, which is lower than the rating of the purchased butterfly isolation valves.

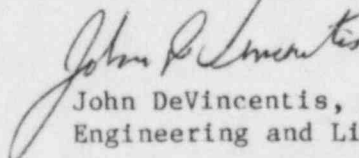
Although the hydrant isolation valves were not specified or recieved with UL Listing or FM Approval, their construction and operation will satisfy the intent of UL/FM requirements for the FP system at Seabrook Station.

Action Taken to Preclude Reoccurrence

ECA 06/105718A was issued to revise specification 248-20, "Yard fire protection and yard potable water piping installation." The specification was revised to assure that all fire protection system components, except for the fire tank heating systems, conforms to the UL and/or FM standards.

We also intend to revise FSAR Section 9.5.1.1 to address any exceptions to the UL/FM approval requirement for Fire Protection System Components. Accordingly please find enclosed a copy of the revised FSAR pages which address the above noted exceptions. This change will be incorporated into the FSAR in a future amendment.

Very truly yours,


John DeVincentis, Director
Engineering and Licensing

Enclosure

cc: Atomic Safety and Licensing Board Service List

9.5 OTHER AUXILIARY SYSTEMS

9.5.1 Fire Protection System

9.5.1.1 Design Bases

The plant fire protection system is a non-safety-related system designed to detect and alarm, control and extinguish fires that may occur. To accomplish this end, the concept of defense in depth is a criterion for design. This concept, applied to fire protection, aims at a balanced program which will:

- a. Prevent fires from starting.
- b. Detect fires quickly, and quickly suppress those that occur, thus limiting their damage.
- c. Design and locate plant equipment such that if a fire occurs and burns for a long time, despite a. and b., that essential plant activities will still be performed.
- d. Ensure that neither inadvertent operation nor failure of a system will induce a failure of any safety-related system.

The guidance provided by APCSB BTP 9.5-1 and its Appendix A and 10 CFR 50 Appendix R is utilized in meeting the design basis.

The fire protection systems have been designed using the general guidelines of the following codes and standards:

- a. American Nuclear Insurers (ANI) - Specifications for Fire Protection of New Plants.
- b. National Fire Protection Association (NFPA) and ANS Codes as listed in Table 9.5-1.
- c. Building Officials and Code Administration - (BOCA) - Basic Building Code.

Equipment in the fire protection systems, except for the fire tank heating systems, conforms to the standards of the National Fire Protection Association, and is Underwriter's Laboratory (UL) listed and/or Factory Mutual approved.

For a listing of unusually hazardous materials which will be used onsite and which could present unexpected fire hazards or could complicate fire-fighting activities, refer to Table 9.5-10.

9.5.1.2 System Description

a. Fire Prevention

The plant fire protection system utilizes design aspects which employ separation criteria, non-combustible material, fire

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