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ILLINOIS POWER COMPANY

CLINTON POWER STATION, P.O. BOX 678, CLINTON, ILLINOIS 61727

August 5, 1985

Docket No. 50-461

Mr. James G. Keppler
Regional Administrator
Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Subject: Inspection of Clinton Power Station
July 8 through 26, 1985 concerning
Unresolved Item 85016-07

Dear Mr. Keppler:

At an exit meeting conducted by Messrs. R. Sutphin and R. Westberg on July 26, 1985, Illinois Power Company committed to formally forward the results of our detailed analysis of the Clinton Power Station Central File Storage Facility. By attachment to this letter, Illinois Power Company forwards the results of the analysis.

Illinois Power Company will forward to you by August 15, 1985, a detailed schedule for completion of corrective actions identified by this analysis. We trust that this information is responsive to your area of interest.

Sincerely yours,

F. A. Spangenberg

F. A. Spangenberg
Director - Nuclear Licensing
and Configuration
Nuclear Station Engineering

JAB/lab

Attachment

cc: B. L. Siegel, NRC Clinton Licensing Project Manager
NRC Resident Inspector Office
Illinois Department of Nuclear Safety
Director, I&E, USNRC, Washington, DC 20555

AUG 7 1985

IE01

NRC Criteria for Records Storage Facilities
(Guidance - ANSI N45.2.9, Section 5.6 Issued 7/1/80)

Requirement (either one of the following)	CPS Design	Action Required	Action Completion Date
1. A 2-hour vault meeting NFPA No. 232 without additional provisions.	N/A	N/A	
2. 2-hour rated file containers meeting NFPA No. 232 (Class B) without additional NFPA provisions.	N/A	N/A	
3. 2-hour rated fire resistant file room meeting NFPA No. 232 if the following additional provisions are provided:	CPS will upgrade the existing facility to meet the requirements of a 2-hour fire resistant file room, with exceptions.	See attached NFPA Code Compliance	
a. Early warning fire detection and automatic fire suppression should be provided, with electronic supervision at a constantly attended control station.	An automatic detection actuated Halon 1301 suppression system has been provided. System actuation alarms in the Main Control Room.	N/A	
b. Records should be stored in fully enclosed metal cabinets. Records should not be permitted on open steel shelving. No storage or records should be permitted on the floor of the facility. Adequate access and aisle ways should be maintained at all times throughout the facility.	Records are not currently stored in fully enclosed metal cabinets. No records will be stored on the file room floor. Adequate access and aisle ways will be maintained.	Investigate need for new file cabinets. (Trip to D. C. Cook Station). Review/Revise CPS Procedures.	8/15/85 Submit Schedule by 8/15/85

SECT. NO.	REQUIREMENTS	CPS DESIGN	ACTION REQUIRED	ACTION COMPLETION DATE
	31. DESIGN OF FILE ROOM			
311.	Location	File room is located on the top (second) floor of the Clinton Power Station (CPS) Service Building. A work area is located directly outside of the file room. There is a roof above the file room and no heavy objects of any kind are located above. The ventilation system is designed to keep the humidity inside the file room below 50%.	N/A	N/A
3111.	The file room should preferably be located in a place accessible to the section of the building where the records are used.			
3112.	Because of the difficulty of providing resistance to severe impact, file rooms should be located where they will not be exposed to the fall of a heavy safe, machine, or water tank.			
3113.	Basement file rooms are undesirable, not only because under certain conditions burning or smoldering debris may be accumulated in a basement sufficient to produce a "cooking effect" of such duration that it cannot be resisted by construction alone (within practical limitations), but also because basement rooms are apt to be damp, causing destruction of records by mold, and they are subject to flooding, under either flood or fire conditions, and consequent damage by water to some or all of the records.	N/A		N/A
3114.	Exterior building walls forming part of a file room are subject to the penetration of moisture, and condensation within the file room may result from differences between the inside and outside temperatures.	N/A		N/A

SECT. NO.	REQUIREMENTS	CPS DESIGN	ACTION REQUIRED	ACTION COMPLETION DATE
	Remedial treatment is described under sections headed "Dampproofing" (Sec. 326) and "Waterproofing" (Sec. 327).			
312. Size				
3121.	File rooms shall not exceed 50,000 cu. ft. in volume, and the height shall not exceed 12 feet.	CPS file room dimensions are 31.2 ft. x 38.9 ft. x 14.7 ft. high for a total volume of 17,841 cu. ft.	This is an exception to the requirement. CPS does not intend to take any action.	N/A
3122.	The foregoing limitations are for the purpose of restricting the quantity of records exposed to destruction by fire in a single enclosure, and to reduce the possibility of fire originating within the enclosure.			
313. Design Considerations				
3131.	File rooms call for unusually good design and construction to insure that the structure will withstand satisfactorily all of the conditions which may be imposed upon it by fire. Plans and specifications shall be prepared and construction supervised by a competent engineer or architect.	Design was done by Sargent & Lundy Engineers, Chicago, IL.	None	N/A
3132.	Proper design and construction of a file room include not only its qualities as a flame barrier and as a heat retardant, but also its ability to avoid settling and consequent cracking, and its ability to maintain the integrity of the file room structure under the stresses and impacts	Structural design was done in accordance with recognized standards and practices. CPS has bonded walls.	None	N/A

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	to which it may be subjected during a fire, including impact from falling objects, and stresses, strains, and erosion due to sudden cooling with fire hose streams. Proper design includes: determination of classification, choice of materials, bonding of the walls, floors, and roof of the file room to each other and to the building, load capacity, etc.			
314. Supervision of Construction				
3141.	Proper construction involves supervision of details to avoid subsequent settlement and cracking of walls and to insure that all structural considerations related to fire resistance will be observed.	Illinois Power Company oversees Baldwin Associates.	None	N/A
	32. CONSTRUCTION OF FILE ROOM			
321. Supporting Structure				
3211.	The supporting structure for the file room shall be of adequate strength to carry the full building load including the weight of the file room structure and its contents. There shall be no combustible material in any portion of the supporting members of the structure. All structural members of the building which support the file room shall have a degree of fire resistance of not less than that required for the walls of the file room.	The structural members have at least a two-hour fire rating. Some members have portions of the fire proofing material removed.	Inspect and repair all fire proof material on structural steel members.	10/1/85

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3212.	The walls of the file room shall follow the panels (if any) of the building wherever possible, and shall extend from floor to ceiling of the building in each story where a file room is located. If file rooms are located on more than one story they shall preferably be placed one above the other in the several stories.	The walls extend from floor to ceiling.	None	N/A
3213.	When a building wall, particularly one bearing the weight of that portion of the building above it, is used to enclose a file room, the failure of the building may result in damage to the file room and its contents.	No load bearing walls are used as file room walls.	N/A	N/A
322. Floor				
3221.	The term "floor of file room" includes the slab between rooms in a tier.	CPS complies	None	N/A
3222. Materials	The floor of the fire-resistive building may serve for the floor of the file room provided it is of non-combustible construction throughout and complies with the following paragraphs.	Floor of Service Building serves as the floor of file room and is made of concrete.	N/A	N/A
3223. Thickness	Floor of file room shall be reinforced concrete not less than 6 in. thick and greater if necessary to support the full load.	CPS complies	None	N/A
3224. Floor Openings	Floor of file room shall not be pierced for any purpose.	File room floor is not pierced.	N/A	N/A
3225. Floor Surfacing	No wood or other combustible material shall be used for floor surfacing.	Floor surface is tile.	N/A	N/A

SECT. NO.	REQUIREMENTS	CPS DESIGN	ACTION REQUIRED	ACTION COMPLETION DATE
3226. Bonding to Walls	Except where formed by the fire-resistive construction of the building, the floor construction of file rooms shall be of fire-resistive materials so designed and built into and bonded or anchored to the wall construction of the file room as to provide the structural strength to safely sustain the dead and live loads involved, in accordance with approved engineering practice.	Floor is constructed of fire resistive materials. Floor is bonded to walls in accordance with good engineering practice.	N/A	Complete
3227. Drainage	It is good practice to have floor of file room (at least the portion under record storage space) about 6 in. higher than the floor of building to avoid wetting of records in lowest storage space.	File room floor is four inches higher than building floor.	This is an exception to the requirement. CPS does not intend to take corrective action because of compliance with requirement under Section 3415.	N/A
323. Walls				
3231. Materials	a. Walls shall be of noncombustible construction throughout, consisting of reinforced concrete or brickwork with vertical as well as horizontal joints filled with mortar; or may be approved hollow concrete masonry units. Walls of hollow units shall be plastered on both sides with at least ½ in. of gypsum or portland cement plaster.	Walls are hollow concrete blocks 7 5/8" with no gypsum or plas- or attached.	Provide ½" of gypsum or portland cement plaster to both sides of all walls.	10/1/85
	b. Reinforcement for concrete shall consist of steel rods of at least ½ in. diameter spaced 6 in. on centers and running at right angles in both directions. Rods shall be securely wired at intersections not over 12 in. apart in both directions and be installed centrally in the wall or	N/A	N/A	N/A

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	panel, or an equivalent form of reinforcement may be used.			
	c. No combustible material shall be used for trim or partitions.	Facility does not have trim or partitions.	N/A	N/A
3232. Thickness	a. To provide not only the necessary minimum resistance to fire and fire hose streams, but also to provide structural considerations and variations in quality of materials and workmanship, walls shall not in any event at any point be less than 6 in. in thickness if of reinforced concrete, nor 8 in. if of brick or hollow concrete units. Walls of these minimum thicknesses are hereinafter referred to walls for a one-hour file room.	Walls are hollow block walls 7 5/8" thick.	N/A. Nominal 8 inch hollow blocks are 7 5/8" thick.	N/A
	b. One-hour file rooms with one-hour file room doors may be expected to be capable of protecting against a complete burning out of the section of the fire-resistive building adjoining the file room, only if the fire area in the vicinity of the room, particularly of the door, has an occupancy containing a moderate amount of combustible material, such as an office occupancy consisting of an ordinary assortment and arrangement of desks, tables, chairs, filing cabinets, cupboards, open containers, etc., and no combustible partitions.	N/A	N/A	N/A
	c. Where the fire area in the vicinity of the file room (e.g., the area within a radius of 25 ft., particularly of the door) has an occupancy having a large amount of combustible material (an office occupancy	Offices are located next to the facility which contain combustible furniture and materials.	Calculate the fire loads in the file room vicinity.	8/15/85

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	with combustible partitions or an extraordinary amount of combustible furniture or open shelving, etc., or a congested file storage area, or a factory, store, or warehouse in which the file room is in the vicinity of combustible merchandise), vault construction is necessary for protection against a complete burn-out. (See Chapter 2, Standard for Fire-Resistive Record Vaults.) It may be desirable to give additional protection to current Class 1 (vital) and Class 2 (important) records by housing them in safes, insulated cabinets or insulated filing devices within file rooms.			
3233. Openings in Walls	a. Interior walls of file room (i.e., those walls which are wholly within the building) shall be unpierced except for protected openings which are required for essential facilities specifically mentioned in this chapter. Such door openings shall be protected with file room doors (See Sec. 325, "File Room Door.")	CPS file room does not have interior walls.	N/A	N/A
	b. Exterior walls of file room (i.e., those walls which are exterior walls of building) shall be unpierced except by door or window openings. Such openings shall be protected with approved file room doors or with approved fire doors suitable for openings in exterior walls or with approved fire window frames fitted with wired glass, with fire-actuated releases for closing them in event of fire. If these openings are exposed by adjoining buildings or structures within 50 ft., windows shall be	Exterior walls are pierced for electrical outlets, ventilation and fire suppression piping.	This is an exception to the requirement. CPS does not intend to take any corrective action because of compliance with requirements under Sections 331, 333, 351, and 352. All ventilation penetrations are protected by fire dampers.	

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	protected with fire shutters or outside sprinklers. Installation of fire doors, windows, and shutters to be in conformity with the Standard for Fire Doors and Windows, NFPA No. 80 -- 1975 and the Recommended Practice for Protection of Buildings from Exterior Fire Exposure, NFPA No. 80A -- 1975. Installation of outside sprinklers to be in conformity with the Standard for the Installation of Sprinkler Systems, NFPA No. 13 -- 1975.			
	c. There shall be no openings from the file room into elevator, stairway, conveyor or other shafts, and no openings from one file room into another.	N/A	N/A	N/A
	d. It is recommended that windows shall be as few and small as practicable and placed above the level of containers housing records. It is also recommended wherever practical that a standard size (78 by 32 in.) single door be used.	CPS file room has no windows. Door is 84 by 40 in.	This is an exception to the requirement, CPS does not intend to take any corrective action.	
3234. Bonding to Fire-Resistive Structures	a. The walls of file rooms shall be laid directly upon the rough structural arch or floor slab construction of the fire-resistive building which shall provide a solid and roughened surface free from combustible or loose material, dirt, or other foreign matter. Such surfaces shall be swept clean and dampened when the construction of the walls and floors of the file room is started.	Block walls are laid directly on the floor slab.	N/A	N/A

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	b. If any wall of the building is of suitable construction to form part of the file room enclosure, the wall or walls of the file room at the intersection with the building wall shall, when practicable, be bonded into it for the full height and width of the file room wall or walls. When such bonding is not practicable, the wall or walls of the file room shall be (a) rabbeted into the building wall for their full height and width to a depth of not less than 4 in., or (b) the bonding may consist of keys the full width of the file room wall and let into the building wall not less than 4 in. These keys to be not less than three (3) brick courses in height, spaced not to exceed 2 ft. on centers, the lower key to be at the floor and the upper key at the ceiling, and with all joints between the keys and the building wall thoroughly filled with mortar or cement grout.	N/A	N/A	N/A
	c. Where structural steel members of a building come in contact with file room construction, such members and their fire-resistant protection shall in no case reduce the minimum thickness of the file room construction called for in these specifications.	N/A	N/A	N/A
	d. Interior columns or pilasters shall not be considered in determining the thickness of file room walls, but such walls shall be bonded or anchored to the fire-resistant protection of columns where they intersect file room and building walls, as provided above.	Columns were not considered in determining the wall thickness.	N/A	N/A

SECT. NO.	REQUIREMENTS	CPS DESIGN	ACTION REQUIRED	ACTION COMPLETION DATE
3235. Bonding of File Room Walls, Floor and Roof	File room walls of masonry units shall be laid with angles and corners well bonded throughout their height. Where the floor construction of the building forms the roof of the file room the joint between the same and the top of the side walls shall be tightly finished and thoroughly filled with mortar or cement grout. Wedging with slate to be provided where required by conditions to insure adequate bonding.	Walls are bonded throughout their height.	None	N/A
3236. Independence from Building Structure	The file room construction shall not be used as a support or bearing for the structural members of the building.	The file room is not used as a supporting structure.	N/A	N/A
324. Roof				
3241.	The term "roof of file room" refers to the ceiling or roof of a single file room and to the ceiling or roof of the top room of a tier, not to the slab between rooms in a tier, which latter is classified as a floor.	CPS file room has a roof.	N/A	N/A
3242. Materials	If the file room extends to the roof of the fire-resistive building, the roof of the building may serve for the roof of the file room; otherwise, the floor of the fire-resistive building may serve for the roof of the file room provided the roof or floor of the building is of noncombustible construction throughout and complies with the following paragraphs.	Roof of the Service Building serves as the roof of the file room. The file room has a 8 inch concrete slab completely covering it.	N/A	N/A
3243. Thickness	Roof of file room shall be at least 6 in. in thickness and greater if subject to unusual impact, or if exposed to fire from	There is a 8 inch solid concrete slab covering the file room. This is	N/A	N/A

SECT. NO.		REQUIREMENTS	CPS DESIGN	ACTION REQUIRED	ACTION COMPLETION DATE
		outside file room, thickness of roof shall be equivalent to that required for the file room wall.	equivalent to a 2-hour fire rating.		
3244.	Interior Supports	Where long spans are needed in file rooms the introduction of interior columns, girders, or division walls may be necessary. All such supports shall be of noncombustible material and all interior steel work shall be protected with at least 2 in. of fire-proofing.	All supports are fire proofed. Some fire proofing has been removed.	Repair structural steel fire proofing. Ensure 2 inch thickness.	10/1/85
3245.	Roof of Openings	Roofs of file rooms shall not be pierced for any purpose.	Roof is not pierced.	N/A	N/A
3246.	Bonding Independent Roof to File Room Walls	Where the floor or roof of the building does not serve as the roof of a file room, its roof construction shall be adequately bonded or anchored to the wall construction, as required by the materials and type of construction used. For reinforced concrete construction, the reinforcing steel in the file room roof shall be extended into the walls for not less than one-half the thickness of the wall and finished with a right-angle or hook anchor. The wall reinforcing steel to be extended into the file room roof construction not less than 18 in. and similarly finished. If steel beams are used in the roof construction, they shall be provided with suitable wall anchors or secured to structural members incorporated in the wall construction.	N/A	N/A	N/A

SECT. NO.		REQUIREMENTS	CPS DESIGN	ACTION REQUIRED	ACTION COMPLETION DATE
325.	File Room Door				
3251.		The term "file room door" as used in these specifications designates a unit consisting of a frame, generally known to the trade as a vestibule, which is designed to be installed in the wall of the file room and into which is hung a single pair of fire-insulated doors equipped with suitable hinges and latching mechanism. The term "file room door" is limited to approved file room door units bearing the label of the Underwriters' Laboratories or other nationally recognized testing laboratories.	File room door is a 4-hour UL labeled door with a UL listed lock.	NA	N/A
3252.		Such doors are capable (1) of preventing the passage into the file room of flame or of heat above a specified temperature for the period indicated on the label and (2) the stresses and strains due to fire or the application of a fire hose stream while the unit is in a highly heated condition without materially reducing its fire resistance.	Door is UL labeled for 4-hour	NA	N/A
3253.	Classification	a. Each opening in the wall of the file room shall be provided with a fire-insulated file room door unit bearing a one-hour fire rating. b. Ordinary fire doors such as tinclad, hollow metal, sheet metal, or metalclad types and plate steel doors are not acceptable as file room doors.	File room door is a 4-hour UL labeled bank vault door with a UL listed lock.	NA	N/A

SECT. NO.	REQUIREMENTS	CPS DESIGN	ACTION REQUIRED	ACTION COMPLETION DATE
3254. Installation of Frame	Installation of the door unit shall be made in conformity with instructions supplied by the manufacturer and shall be entrusted only to those experienced in such work. This will insure that the door unit as installed will maintain its integrity, not only as a flame barrier, but also as a heat retardant under the stresses and impacts from falling objects, settlement of the wall, and expansion or distortion of the door itself due to sudden cooling with fire hose streams.	Door was installed in accordance with the manufacturers recommendations.	N/A	N/A
3255. Escape Device	The door-locking mechanism shall be of a type which enables a person accidentally locked inside the file room to unlock the door from inside the room.	Door will open from inside.	N/A	
3256. Door Closers	Doors should preferably be equipped with self-closers. When conditions are such that the doors may be fastened in the open position, the self-closers should be utilized for this purpose and be equipped with heat actuated releases to close them in case of fire.	Door closers have not been provided. There are no provisions for fastening door in open position.	This is an exception to the requirement. CPS does not intend to take any corrective action.	
326. Dampproofing				
3261.	When walls, floor, or roof are dampproofed, methods and materials used shall be such that the desired fire-resistance of the file room will not be impaired. When temperature changes between the exterior and interior of the file room may be encountered, the resultant condensation (sweating) may be avoided by constructing	NA	NA	NA

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	a continuous air space of preferably 2 in. formed by a noncombustible lining inside the file room.			
327. Waterproofing				
3271.	Where conditions require waterproofing, the problem shall be referred to a competent engineer or architect.	NA	NA	NA
	33. SERVICES TO FILE ROOM			
331. Lighting				
3311.	The lighting shall be electric, with all interior wiring in conduit and installed in accordance with the National Electrical Code, NFPA No. 70-1975. The conduit if exposed shall preferably be located on the ceiling so as to avoid the possibility of records coming in contact with it; where it is carried through the wall of the file room, the hole shall be made as small as possible and the space around the conduit shall be completely filled with cement grouting. Floors and roofs shall not be pierced for conduit.	Electric lighting is provided with wiring contained in conduit. There are three 5 ft. exposed sections of conduit running down the inside file room walls. Two conduits are for light switches and one is for a fire alarm. Floors and roofs are not pierced.	Ensure that records cannot contact the exposed conduit. Move light switches to outside of file room and provide red pilot lights for each.	NA
3312.	The wiring shall provide as many fixed lamps as needed for adequate illumination. There shall be no pendant or extension cord within the file room. Care should be taken to make fixed lighting adequate to illuminate all portions of the file room, as otherwise matches or other hazardous forms of illumination are likely to be used.	Lighting is inadequate for existing configuration	After new equipment and arrangement is determined a lighting study will be done.	9/1/85

SECT. NO.	REQUIREMENTS	CPS DESIGN	ACTION REQUIRED	ACTION COMPLETION DATE
3313.	Wiring shall be so arranged that both wires of the circuit shall be disconnected when the lights are out. Main switches shall be outside the room and provided with a red pilot light.	Both wires of a circuit are disconnected by the switches. Switches are located inside file room.	Move switches to outside wall and provide red pilot lights for each.	Submit schedule by 8/15/85.
332. Heating				
3321.	Heating shall be by hot water or steam. When steam heating is used, the coils or radiators shall be so located as to avoid the possibility of any records coming in contact with them. Piping should preferably be placed overhead. Where the pipe is carried through the wall, the hole shall be made as small as practicable, the pipe provided with a close-fitting, noncombustible sleeve and the space around the outside of the sleeve shall be completely filled with cement grouting. Floors and roofs of the file rooms shall not be pierced for piping. Open flame heaters, electrical heaters, etc., shall not be employed.	Heating will be supplied through self contained HVAC system.	This is an exception to the requirement. See Section 3333.	Submit schedule by 8/15/85.
333. Ventilation				
3331.	Ventilation of interior shall be through door openings.	Ventilation will be by a self contained HVAC system.	This is an exception to the requirement. See Section 3333.	Submit schedule by 8/15/85
3332.	It is sometimes imperative that a ventilation system be provided. Therefore, it should be recognized that the presence of the system adds to the possibility of entrance of fire or paper-damaging heat from outside the file room.	NA	Provide a self contained HVAC system.	Submit schedule by 8/15/85

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3333.	To minimize this possibility, the system should be installed in accordance with the Standard for the Installation of Air Conditions and Ventilation Systems, NFPA No. 90A-1975, and the following safeguards should be taken: The system should be independent of any other ventilating system; all air conditioning apparatus, fans, filters, etc., should be located outside the file room; each duct should be provided with an adjustable fire damper equipped with approved automatic means of closing it and shutting down fans in event of fire outside or inside the file room; ducts should be so located as to avoid the possibility of records coming into contact with them, preferably on the ceiling; where a duct is carried through a file room wall its installation should be such that it will not impair the ability of the vault to protect its contents against fire (and heat) from outside the room.	Separate HVAC system to be installed on roof of Service Building. Air will be supplied to room by ceiling ducts with fire dampers in accordance with NFPA No. 90A.	Design and install new HVAC system for room.	Submit schedule by 8/15/85
3334.	The floors and roofs of file rooms should not be pierced for ducts.	Floors and roofs are not pierced for ducts	NA	NA
341. Equipment				
3411.	Filing equipment shall be noncombustible throughout. All records shall be stored in fully enclosed containers so far as possible. If complete enclosure of certain records is impracticable, shelfing having only the front open may be used, but loose papers should not be filed on open shelving. Cubical contents of individual compartments of shelving should have	Some Filing equipment is open shelving and made of combustible material. There are some transitory loose papers. Cubical contents are larger than 10 cubic feet.	Evaluate need for new filing equipment. (Visit D.C. Cook Station).	8/15/85

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	a volume of not more than 10 cu. ft., preferably less.			
3412.	Arrangement of filing devices within the room shall be such that they will be in short sections and with ample aisles between so as to retard the spread of fire. If open-front shelving is used, the sections of shelving should be broken up with fully enclosed containers to form fire stops.	Arrangement will not retard the spread of fire.	Evaluate need for acceptable filing arrangement. (Visit D.C. Cook Station)	8/15/85
3413.	Open-front containers shall be located at least 36 in. away from door and window openings; fully enclosed containers at least 6 in. away.	Open front containers are located within 12 inches of door.	Evaluate need for acceptable filing arrangement. (Visit D.C. Cook Station)	8/15/85
3414.	All furniture (including desks, chairs, cupboards, etc.) shall be noncombustible and shall be limited to that needed for filing operations.	Existing furniture is made of combustible materials.	Evaluate need for acceptable filing arrangement. (Visit D.C. Cook Station)	
3415.	If floor of the file room, at least the portion under record storage space, is not 4 in. higher than the floor of the building, the bottom of the lowest record storage space in filing equipment or on shelving should not be less than 4 in. above the floor of the room.	Floor of file room is 4 inches higher than the floor of the Service Building.	NA	N/A
342. Supervision				
3421.	The room shall be under responsible supervision from opening until closing time, and inspections shall be made daily, particularly before closing time, to insure that all containers are closed, no records left	This is currently covered in CPS Procedures	NA	N/A

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	on top of desks, containers or elsewhere exposed, all waste paper removed, and all doors, windows and containers closed.			
3422.	The room should not be used as a working space for other than filing operations. Persons other than authorized personnel should not be permitted in the room.	This is covered by CPS Procedures	NA	
3423.	All doors and window openings to file rooms should be marked to caution firemen against opening the doors or windows or directing hose streams into them, unless a fire is in progress within.	No signs or instructions are provided.	Provide sign.	8/30/85
343. Housekeeping		Covered by CPS Procedures.	NA	NA
3431.	In addition to the precautions regarding lighting, heating, ventilation, and supervision previously mentioned, the following shall apply:			
3432.	General cleanliness shall be of the highest type.			
3433.	Safety photographic film may be treated as records, but flammable nitrate film must not under any circumstances be housed in file rooms.			
3434.	Smoking inside file rooms shall be positively forbidden. Matches shall not be allowed inside the room.			
3435.	No furniture polishing or refinishing of any sort should be done inside the rooms.			

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	35. FIRE PROTECTION EQUIPMENT FOR FILE ROOMS			
351.	Automatic Fire Extinguishing Systems			
3511.	Automatic sprinklers installed in accordance with the Standard for the Installation of Sprinkler Systems, NFPA No.13-1975, are effective in extinguishing or limiting the spread of fire, but involve the possibility of water damage. Water damage to file room contents would be greater if, in the absence of needed automatic sprinklers, hose streams were used. Where sprinklers are installed, conveniently located sprinkler alarms and shutoff valve outside the file room should be provided to permit turning water off promptly after fire is extinquished, thus preventing unnecessary water damage.	An automatic Halon 1301 system has been provided.	NA	NA
352.	Automatic Fire Alarm Systems			
3521.	Automatic fire-detecting systems installed in accordance with the recommendations of NFPA signaling systems standards are valuable in giving warning of fire inside file rooms. The standards are: Standard for the Installation, Maintenance, and Use of Central Station Signaling Systems NFPA No.70--1974; Standard for the Installation, Maintenance, and Use of Local Protective Signaling Systems, NFPA No.72A--1975; Standard for the Installation, Maintenance Use of Auxiliary Protective Signaling	Smoke detectors are provided & designed per NFPA 72E.	NA	

SECT. NO.	REQUIREMENTS	CPS DESIGN	ACTION REQUIRED	ACTION COMPLETION DATE
	Systems. NFPA No72B--1975; Standard use for the Installation, Maintenance, and Use of Remote Station Protective Signaling Systems, NFPANo. 72C.--1975; Standard for the Installation, Maintenance and Use of Proprietary Protective Signaling Systems; NFPA No.72D--1975; Standard on Automatic Fire Detectors NFPA No72E--1975. The systems should be relied upon only when there is assurance that the alarms will bring prompt response at all times.			
353. Manual Fire Extinguishing Equipment				
3531.	Portable fire extinguishers of type suitable for Class A fires (see Standard for the Installation, Maintenance and Use of Portable Fire Extinguishers, NFPA No.10--1974) or standpipe systems with small hose suitable for use by occupants of the building (see Standard for the Installation of Standpipe and Hose Systems, NFPA No.14--1974) should be provided at a conveniently accessible location outside the door of the file room. Such protection is recommended in all cases.	The closest portable fire extinguisher is approximately 100' from the file room door.	Provide Halon 1211 portable fire extinguisher next to file room door.	9/1/85