



Duquesne Light

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November 27, 1985

United States Nuclear Regulatory Commission
Attn: Mr. Lester Rubenstein, Director
PWR Project Directorate #2
Washington, DC 20555

Reference: Beaver Valley Power Station, Unit No. 1
Docket No. 50-334, License No. DPR-66
Fire Protection

Gentlemen:

As a result of our recent Appendix R - Fire Protection audit conducted during the week of November 18, 1985, a concern was raised by the reviewers regarding our Fire Protection Safety Evaluation Report (SER) dated June 6, 1979. Specifically, Table 3.1 "Implementation Dates for Proposed Modifications", item 3.12 identified as "Control of Unnecessary Combustibles" (page 3-9) lists October 31, 1980 as the due date for item 3.12.4 titled "Combustible Waste Storage".

The intent of the commitment was for implementation of control of combustibles for the waste storage area (Primary Auxiliary Building) by the October 31, 1980 due date. Section 5.11.6 "Modifications" (page 5-16) identifies a new building to be constructed "in the near future". This was not intended to mean the new storage facility would be built by October 31, 1980 as interpreted by the reviewers.

An NRC followup inspection was conducted to verify licensee compliance with the implementation schedule identified in Table 3.1 of the Fire Protection SER. The inspection report (#80-03) dated April 2, 1980 verified administrative controls had been established for control of combustible waste storage and closed the item in question (item 3.12).

To clarify this issue, we suggest editorial changes be made to the SER dated June 6, 1979 as noted in the enclosed pages to avoid future misunderstandings.

Very truly yours,

J. J. Carey
J. J. Carey
Vice President, Nuclear

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Enclosure

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3.12-2 Fire Retardant Wood

All untreated lumber and wood items in safety-related areas will be removed. All lumber and wood required for use in safety-related areas will be treated, fire retardant lumber. Large wooden timbers may be coated with a fire retardant compound. (6.1.3)

3.12-3 Containers

Approved trash containers made of sheet metal and equipped with self closing covers in safety-related areas. (6.1.3)

3.12-4 Contaminated Waste Storage

Control of combustible waste storage will be established in the Primary Auxiliary Building (PAB). (5.11)

3.12-5 Stairwells

Flammable materials stored in stairwells will be removed. (Completed) (6.1.3)

3.12-6 Procedures

Administrative Controls will be established and implemented to control combustibles in safety related areas. (6.1.3)

3.13 Fire Rated Penetrations

3.13-1 Cable Fire Stops - Fire Wall Penetrations

All fire barrier penetrations in safety-related areas will be properly sealed and all flammable materials used for damming will be removed. (4.9.3; 4.9.4)

3.13-2 Ceiling - Cable Spreading Room

Penetrations between the cable spreading room and the control room benchboards will be upgraded to three-hour rated fire barriers. (5.1.6)

3.14 Charging Pump Cubicle

Smoke detectors will be installed in each charging pump cubicle with alarm annunciation in the control room. (4.2)

3.11 Diesel Generator Rooms

July 31, 1980

- 3.11.1 Drainage System
- 3.11.2 Oil Line Break
- 3.11.3 Curbing
- 3.11.4 Three-hour Fire Door
- 3.11.5 Fire Rating of Penetration
- 3.11.6 Sump Oil Level Detection
- 3.11.7 Manual Actuating Stations

3.12 Control of Unnecessary Combustibles

- 3.21.1 Flammable Liquids
- 3.12.2 Fire Retardant Wood
- 3.12.3 Trash Containers
- 3.12.4 Combustible Waste Storage
- 3.12.5 Stairwells
- 3.12.6 Procedures

June 30, 1979
December 31, 1979
June 30, 1979
October 31, 1980
Completed
December 31, 1979

3.13 Fire Rating of Penetrations and Barriers

- 3.13.1 Cable Fire Stops - Auxiliary Bldg
- 3.13.2 Ceiling - Cable Spreading Room
- 3.13.3 Fire Wall Penetration - Switchgear
Rooms

December 31, 1979
Complete
December 31, 1979

3.14 Charging Pump Cubicle

December 31, 1979

3.15 Fire Hoses

- 3.15.1 Booster Hoses
- 3.15.2 Testing

July 31, 1980
June 30, 1979

3.16 Gas Cylinder Storage

January 31, 1979

3.17 Floor Panel Lifter - Process Control Room

June 30, 1979

3.18 Cable Spreading Room - Fire Suppression

October 31, 1980

4. A control for shutting off the diesel fuel transfer pump outside of the diesel generator rooms will be provided.
5. Floor drains in the diesel generator rooms will be plugged.
6. A fail safe level detecting device will be installed in a sump close to the day tank to detect an oil accumulation due to a leak. High sump level will be annunciated in the control room.
7. Fire barrier wall penetration between Diesel Generator rooms will be evaluated and up-graded to a 3 hr barrier.

We find that, upon implementation of the above described modifications, the Diesel Generator Room's fire protection satisfies the objectives identified in Section 2.2 of this report and is, therefore, acceptable.

5.11 Primary Auxiliary Building PAB-1

5.11.1 Safety Related Equipment

Safety-related equipment required for safe shutdown is located in the Primary Auxiliary Building. It is adjacent to the service building, cable vault building and fuel building.

5.11.2 Combustible Materials

The only significant source of combustibles in this building are the charcoal filters in the main exhaust filter banks, electrical cable insulation in trays and unlabeled waste.

5.11.3 Consequences if No Fire Suppression

An unsuppressed fire in this area could result in a release of radioactive contaminated materials to the environment.

5.11.4 Fire Protection System

All exterior doors to adjacent buildings have 3-hour fire rating. All interior doors to stair towers in the PA building have 1 1/2 hour fire rating. The charcoal filter banks are provided with a water deluge spray system that is actuated automatically by heat detectors. Manual actuation capability is also provided. Portable CO₂ fire extinguishers and hose racks are provided throughout the PA building.

5.11.5 Adequacy of Fire Protection

Lack of detection could allow fire to propagate unnecessarily.

5.11.6 Modifications

Appropriate fire detection and suppression coverage with common control room alarm will be provided upon construction of the new waste storage facility.

We find that, subject to the construction of the new building and implementation of the control of combustible waste storage in the PA building, fire protection for this area satisfies the objectives identified in Section 2.2 of this report and is, therefore, acceptable.

5.12 Fuel Oil Storage Areas

5.12.1 Safety Related Equipment

Diesel generator fuel oil tanks are located underground, covered with sand and concrete slab and located 50 ft. from diesel generator cubicles.

5.12.2 Combustible Materials

Each of the fuel oil storage tanks contain 20,000 gallons of fuel oil.