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U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555 - 0001

Joseph M. Farley Nuclear Plant
Response to NRC Letter
Kaowool Fire Barrier Licensing Basis

Ladies and Gentlemen:

This is submitted in response to an NRC letter dated December 23, 1999, that provided information on the Farley Nuclear Plant (FNP) fire protection licensing basis. Southern Nuclear Operating Company (SNC) staff has reviewed the content of the letter and has found it to be a useful document, although not fully reflecting the FNP licensing basis. SNC wishes to ensure that wording of certain comments contained in the table attached to the NRC letter does not result in a misunderstanding. Taken out of the context of the documents quoted, a future review could lead to an incorrect conclusion regarding the licensing basis of fire barriers at FNP.

From select quotes included in the NRC letter, such as item 13 "a double thick barrier consisting of two layers of 30-minute-rated enclosure will be installed," it could be misconstrued that FNP is committed to fire wraps with a one hour rating. Subsequent to issuance of the letters referenced in the NRC's table, FNP submitted and was granted exemptions from one hour fire barrier requirements. A typical example of an FNP exemption request (2-26 Rev. 1) for fire area 2-076 stated:

"Request exemption from section III. G.2.c to the extent that it requires one train of redundant safe shutdown cables to be enclosed by a barrier having a 1-h fire rating . . ."

The NRC response to this request, which is typical, contained in a letter dated November 19, 1985 stated:

"Based on our evaluation, we conclude that the licensee's alternative fire protection and shutdown configuration will provide an acceptable level of fire protection to that required by the technical requirements of 10 CFR 50, Appendix R, Section III. G. 2 . . ."

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We believe that the FNP licensing basis does not require one hour fire barriers for those areas with approved exemptions from the one hour barrier requirements of 10 CFR Part 50 Appendix R Section III.G.2.c.

Notwithstanding our position concerning the FNP licensing basis, SNC will continue to work with the NRC staff to resolve the concern with the use of kaowool at FNP. We will be requesting a meeting with you in March or early April of this year to discuss our specific plans.

This letter contains no NRC commitments.

If there are any questions, please advise.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY



Dave Morey

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cc: Southern Nuclear Operating Company
Mr. L. M. Stinson, General Manager - Farley

U. S. Nuclear Regulatory Commission, Washington, D. C.
Mr. L. M. Padovan, Licensing Project Manager - Farley

U. S. Nuclear Regulatory Commission, Region II
Mr. L. A. Reyes, Regional Administrator
Mr. T. P. Johnson, Senior Resident Inspector - Farley