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Edwin I. Hatch Nuclear Plant



February 26, 1982

PM-82-164

PLANT E. I. HATCH Special Report Docket #s 50-321 50-366

United States Nuclear Regulatory Commission Office of Inspection and Enforcement Region II Suite 3100 101 Marietta Street Atlanta, Ga. 30303

ATTENTION: Mr. James P. O'Reilly

Pursuant to section 6.9.2 of Hatch Units 1 and 2 Technical Specifications, please find attached a Special Report.

> Manry Plant Manager

MES/hh

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Control Room

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Special Report
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Plant E. I. Hatch
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SUBSTANDARD SMOKE DETECTION INSTALLATION

Previous NRC audit 80-02 prompted the site to request inspections of all commitments by our fire protection consultant. The substandard smoke detection installations that were identified in deviation reports 1-80-337 and 2-80-472 on October 31, 1980, were a result of these inspections. The deficiencies were based on statements in the "Evaluation of the Hatch Nuclear Plant Fire Protection Program", section IV.C.1.a., relating to the detection system design philosophy as being "in general compliance to applicable guidance in NFPA 72D". On November 21, 1980, a Special Report was sent to the NRC which stated that an analysis was being performed to determine which detectors could more fully comply with the intent of NFPA 72, and that the work was "expected" to be complete by March 1, 1982.

As a result of unforeseen regulatory requirements such as Appendix R, 79-01B, and TMI, and the corresponding manpower demands placed on the A.E.'s, the complete design packages have not been received. The available partial packages reveal a larger scope of work than originally anticipated, and consequently, modification by the expected date is not possible. In addition, the extensive sprinkler additions in the already congested cable spreading room, required by NRC IE 80-02-02, were made after the field walk down of the detection systems in this area and will necessitate an additional design review to assure accessibility of the new detector locations. The health physics and control room modifications required by NUREG 737 will also affect detector placement in the near future. The delay of the modifications should not affect the operability of systems monitoring safety related areas.

Our consultants and A.E.'s feel that the modifications could decrease the time response of the systems, and the empirical basis of NFPA 72 is not as sound as for sprinkler head placement. Therefore, the improvements in time response, if any, would not be possible to evaluate.

In light of the minimal effects to operability, the plant modifications in the affected areas referenced above, and the extensive modification potential from Appendix R, we now intend for the modifications to safety related area detection systems to coincide with the schedule for Appendix R smoke detection additions in order to allow time for a more complete design review and a consolidated smoke detection modification program.