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MANUAL****QUALITY RELATED  
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## UPDATE FOR IP3 TECHNICAL REQUIREMENTS MANUAL

AFFECTED SECTION	REMOVE	INSERT
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Section 3.7.A.3 – Fire Separation Devices	Revision 1 Pages 3.7.A.3-1 through -5	Revision 2 Pages 3.7.A.3-1 through -6

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CC_NAME	NAME	DEPT	LOCATION
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518	DOCUMENT CONTROL DESK	NRC (ALL EP'S)	OFFSITE
527	MILIANO PATRICK	NRC/SR. PROJECT MANAGER	OFFSITE
528	PETACHI CHRISTA	WC/ONE STOP SHOP	IP2
529	DECLEMENTE VINNIE	OPS/ (TYPE A DWG LG/ONLY)	IP3/2ND FL

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### 3.7 PLANT SYSTEMS

#### 3.7.A FIRE PROTECTION SYSTEMS

##### 3.7.A.3 Fire Separation Devices

TRO 3.7.A.3 Fire Seals, Fire Doors, Fire Dampers in required Fire Barriers, Controlled Barriers, Fire Barrier Wraps, and Radiant Energy Shields shall be OPERABLE (Refer to AP-64.1 for listing).

APPLICABILITY: AT ALL TIMES, except as modified in Note 3 or 4 below.

#### NOTES

1. Separate Condition Entries are allowed for individual features.
2. TRO 3.0.C does not apply.
3. For Fire Separation Devices that are only Appendix R type features as identified in AP-64.1, entry into Actions below is not required in Modes 5, 6 or when de-fueled.
4. For Fire Separation Devices that are not required because the equipment they are protecting is not required to be OPERABLE, entry into Actions below is not required.
5. TRO 3.0.D is not applicable.

#### ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more of the following Fire Protection or Appendix R features inoperable. (i.e. Fire Seals, Fire Doors, Fire Dampers in required Fire Barriers, Controlled Barriers, Fire Barrier Wraps, and Radiant Energy Shields.)	A.1.1 Establish a continuous fire watch on at least one side of the inoperable feature, <u>OR</u>	1 hour
	A.1.2.1 VERIFY the operability of fire detectors on at least one side of the inoperable feature. <u>AND</u>	1 hour
	A.1.2.2 For inoperable features outside the Containment Building, establish an hourly fire watch patrol, except when Condition B applies. <u>AND</u>	1 hour
	A.1.2.3 For Fire Barrier Wraps and Radiant Energy Shields inside the Containment Building establish a fire watch patrol once every 8 hours when not in MODE 1. <u>AND</u>	2 hours
	A.2 For Fire Protection features, restore the inoperable to OPERABLE status. <u>AND</u>	7 days
	A.3 For Appendix R features, restore the inoperable feature to OPERABLE status.	30 days

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. One or more fire doors or fire seals in the barriers separating the diesel generator compartments from each other or from the Control Building, inoperable,  <u>AND</u>  CO2 fire suppression system of the diesel generator building, adjacent to the inoperable fire door or fire seal in the barrier(s), unavailable per TRO 3.7.A.7.	B.1 Establish a continuous fire watch with backup fire suppression equipment for the diesel generator compartments where the CO2 fire suppression system(s) is (are) unavailable per TRO 3.7.A.7,  <u>AND</u>  B.2 Restore the inoperable feature to OPERABLE status.	1 hour          7 days
C. Required Actions and Completion Times of A.2, A.3 and/or B.2 not met.	C.1 Submit a Special Report to the PORC in accordance with TRM 5.4.B.	14 days

#### SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
TRS 3.7.A.3.1	DEMONSTRATE each barrier, wrap, and shield to be OPERABLE by visual inspection. Refer to AP 64.1 for listing.	24 months
TRS 3.7.A.3.2	<p>-----NOTE-----  The inspection sample shall be determined as described in BASES TRS 3.7.A.3.2.  -----</p> <p>DEMONSTRATE 15% of fire seals located in fire barriers governed by this TRO (refer to AP 64.1 for listing) to be OPERABLE by visual inspection.</p> <p>(i) not readily accessible penetration seals as defined in the BASES TRS 3.7.A.3.2  (ii) inaccessible penetration seals as defined in the BASES TRS 3.7.A.3.2</p>	24 months (i) when accessible but within 15 years (ii) not required <u>AND</u> Prior to declaring a fire seal OPERABLE following repairs or maintenance.
TRS 3.7.A.3.3	DEMONSTRATE each fire door to be OPERABLE by visual inspection and operation. (Refer to AP 64.1 for listing)	184 days
TRS 3.7.A.3.4	DEMONSTRATE each fire damper to be OPERABLE by visual inspection and operation (Refer to AP 64.1 for listing).	24 months

## BASES

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### BACKGROUND

These specifications are established to assure the operability and provide surveillance requirements of fire protection and detection systems provided to protect equipment utilized for safe shutdown of the unit.

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### APPLICABLE SAFETY ANALYSIS

The fire protection and detection systems installed at IP3, conform to Appendix A of Branch Technical Position (BTP) APCS 9.5-1 "Fire Protection for Nuclear Power Plants", as approved by the NRC Regulatory Staff on March 6, 1979 as Amendment No. 24 to facility operating license No. DPR-64, and supplements thereto, and IP3 Appendix R Analysis (latest revision). NSE 97-03-013-FBAR, revision 1, "Fire Barrier Penetration Seal Inspections," justifies a change in inspection method at a frequency of 24 months from 100% sample inspection to a 15% defined sample inspection. NSE 97-3-302-FP-CO2, Rev. 0, allows an hourly fire watch patrol in lieu of a continuous fire watch in the emergency diesel generator compartment(s) when its CO2 fire protection system is unavailable with its fire barriers, sprinkler system and detection system meeting certain requirements. If its sprinkler system, barriers or detection system becomes degraded below these requirements then TRO 3.7.A.2, 3.7.A.3, and 3.7.A.4, respectively, require establishing a continuous fire watch for the affected diesel compartment(s). NSE 96-3-395FP, combined Operational Specification 3.2.13 and 3.5.3 (converted to TRO 3.7.A.3 for inclusion in TRM) into one specification and adapted AP 64.1 for listings.

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### TRO

Fire Separation Devices are those which are required by the Fire Protection Program to separate redundant safety-related systems or isolate safety related systems and components from unacceptable hazards. Appendix R barriers are those barriers which have been credited in the Appendix R Safe Shutdown Analysis. Refer to AP-64.1 for a listing of fire barriers, fire wrap or radiant energy shields governed by this Technical Requirement.

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### APPLICABILITY

Fire Protection Barriers are those that are required by the Fire Protection Program to separate redundant safety-related systems or isolate safety related systems and components from unacceptable hazards. Appendix R barriers are those barriers which have been credited in the Appendix R Safe Shutdown Analysis. Refer to AP-64.1 for a listing of fire barriers, fire wrap or radiant energy shields governed by this Technical Requirement.

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### ACTIONS

Note 1 modifies the Actions to clarify the application of Completion Times for inoperable Fire Protection and Appendix R features. Separate condition entry is allowed for each inoperable features separation device. The Completion Time(s) for the inoperable Fire Protection and Appendix R feature will be tracked separately for each feature starting from the time the Condition was entered for that feature.

Note 2 provides an exception to TRO 3.0.C and precludes a plant shutdown if the required actions are

not performed in their completion time. These notes are acceptable because it is judged reasonable and determined not to adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

Note 3 modifies the applicability statement for Fire Separation Devices that are only required for Appendix R compliance. Note 3 is an allowance not to enter Action statement(s) when in modes 5, 6 or when de-fueled for inoperable Appendix R fire separation devices, since Appendix R only applies above cold shutdown.

Note 4 provides an allowance not to enter Action statement(s) for those inoperable fire separation devices when the equipment they are protecting is not required to be operable.

Note 5 provides an allowance for changes in operating MODE while relying on Required Actions. Allowance of this exception to TRO 3.0.D is also based on the low probability of an event requiring the use of such instruments and reasoning that such instruments can generally be repaired during plant operation without a significant risk of a spurious plant trip.

#### A.1.1, A.1.2.1 & A.1.2.2

Verification of OPERABILITY of fire detectors is satisfied if the last surveillance test that was performed satisfactorily demonstrated system or component OPERABILITY. If any information is available that challenges OPERABILITY, then the OPERABILITY is questionable until it is demonstrated by performing another test. Information that can challenge OPERABILITY can be (but is not limited to) visual observation, or PIDs, DERs, or work requests written against the system.

The completion time of 1 hour was selected as a reasonable time in which a continuous fire watch could be posted or verification of the OPERABILITY of fire detectors could be done along with the posting of an hourly fire watch patrol

#### A.1.2.3

The completion time of 2 hours was selected as a reasonable time in which a fire watch patrol could be established inside the Containment Building considering confined space issues and existing radiological controls governing such an entry. The establishment of an 8-hour fire watch patrol for areas inside the Containment Building was selected to limit radiation exposure to fire watch personnel while still maintaining reasonable compensatory measure given the potential fire hazard. Access to the Containment Building during MODE 1 is limited, as such the presence of transient combustibles or activities that could affect redundant systems and components is also limited.

#### A.2, A.3

With any barrier inoperable, the barrier must be restored to OPERABLE status within 1 hour or take compensatory actions and restore the barrier to OPERABLE status within 7 days and for Appendix R barrier within 30 days.

The completion times were selected as a reasonable time to restore the barrier to OPERABLE status with compensatory measures in place.

#### B.1

The completion time of 1 hour was selected as a reasonable time in which a continuous fire watch could be posted.



B.2

The completion time of 7 days for restoring an inoperable fire protection feature to OPERABLE status was selected as a reasonable time to restore the barrier to OPERABLE status with compensatory measures in place.

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**SURVEILLANCE REQUIREMENTS**

**TRS 3.7.A.3.2**

A minimum 15% sample of penetrations shall be visually inspected on a 24 month frequency. If a non-functional penetration seal is found during the initial inspection, a determination of the cause of unsatisfactory condition shall be performed and an additional 15% sample shall be generated based on that cause (i.e., penetrations most likely to experience the same problem) and inspected. This inspection process shall continue until a sample has rendered satisfactory inspection results.

The initial sample shall be determined based on environmental conditions to which the penetration seals are exposed (i.e., temperature, humidity and radiation). The sample selection shall also ensure that each type of seal is reasonably represented in the sample. In an effort to employ a systematic approach to the inspections thereby eliminating the potential of new penetrations being overlooked if only a few penetrations on any one wall are inspected, the initial sample shall also be determined based on fire barriers. That is, a group of fire barriers will be selected for each inspection period. The barriers will be selected based on environmental conditions. All penetrations in the selected barriers shall be inspected. The number of penetrations shall be reviewed to ensure that at least 15% of all penetrations is obtained. Further, the sample shall be reviewed to ensure that each type of seal is reasonably represented in the sample.

Should a penetration seal that is not readily accessible (as defined below) be selected as part of the sample, the inspection of that seal may be held in abeyance until such time that the seal becomes accessible. This may be dependent on the preventive maintenance program (deenergized equipment), plant operating mode (radiation areas) or scaffolding program (physical accessibility, see note below). Another penetration shall be selected if required to fill the minimum 15% sample.

Penetration seals that are defined as not readily accessible include those that are located:

- 1) within energized electrical enclosures that are high voltage and have an exposed electrical connection or bus work
- 2) in locked or bolted panels and enclosures that are high voltage and have an exposed electrical connection or bus work, or have a significant trip risk
- 3) in locked high radiation areas, or high radiation areas where accessibility may be dependent on plant evolutions
- 4) in areas where physical access is significantly restricted and the use of remote mirrors, binoculars or scopes is significantly difficult
- 5) in the same fire zone where scaffolding has been erected and some of the inspection sample are readily accessible by use of the scaffolding

Note: Generally, the use of scaffolding does not provide the basis for relief from the above unless the erection of that scaffolding may cause a personnel hazard or potential plant transient.

Visual inspection of inaccessible penetration seals may be discontinued. Prior to discontinuing inspection of inaccessible penetration seals, an engineering evaluation in accordance with the guidance of Generic Letter (GL) 86-10 shall be performed for each seal. This evaluation should consider proximate combustible loading, hazards and consequences of seal failure as well as other

mitigating features. Penetration seals that are defined as inaccessible include those which are located in areas where physical access is not possible or extreme measures are required to support inspection of the seal (i.e., where destructive measures are required or where removal of fixed equipment or building features is required).

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REFERENCE	FSAR 9.6.2
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