

PROPOSED CHANGES TO THE TECHNICAL SPECIFICATION PAGES

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- a. All non-automatic containment isolation valves not required for normal operation are closed and blind flanges are properly installed where required.
- b. The equipment door is properly closed and sealed.
- c. At least one door in the personnel air lock is properly closed and sealed.
- d. All automatic containment isolation trip valves required to be closed during accident conditions are operable or are secured closed except as stated in Specification 3.6.3. Manual valves qualifying as automatic containment isolation valves are secured closed.
- e. The uncontrolled containment leakage satisfies Specification 4.4.

1.8 QUADRANT POWER TILT

The quadrant power tilt is defined as the ratio of maximum to average of the upper excore detector currents or the lower excore detector currents, whichever is greater. If one excore is out of service, the three in-service units are used in computing the average.

1.9 ~~FIRE SUPPRESSION WATER SYSTEM~~

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~~A fire suppression water system shall consist of: a water source; pumps; and distribution piping with associated sectionalizing control of isolation valves.~~

1.10 STAGGERED TEST BASIS

A Staggered Test Basis shall consist of:

- a. A test schedule for n systems, subsystems, trains or designated components obtained by dividing the specified test interval into n equal subintervals.

DELETED

3.14

FIRE PROTECTION SYSTEMSApplicability:

Applies to the operating status of the fire detection instrumentation, fire suppression systems, fire barriers, and to the administrative controls required for a comprehensive fire protection and prevention program. The requirements of these specifications shall apply to an area or areas when equipment in that area or areas is required to be operable as specified by other Limiting Conditions for Operation.

Objectives:

To assure the operability of Fire Protection Systems.

Specification:3.14.1 Fire Detection and Actuation Instrumentation

- 3.14.1.1 As a minimum, the fire detection and actuation instrumentation for each fire detection zone shown in Table 3.14.1 shall be operable.
- 3.14.1.2 With the number of operable fire detection and actuation instruments less than required by Table 3.14.1:
- For Fire Zones 24, 25A, 25B, 25C and 26 (inside Reactor Containment) initiate an inspection once per shift of the affected zone with particular emphasis on identifying any potential hazards for fire.
 - For all other fire zones, within one (1) hour increase the inspection frequency of the zone with the inoperable instrument(s) to at least once per hour.
 - Restore the inoperable instrument(s) to operable status within 14 days or prepare and submit a Special Report to the Commission within the next 30 days outlining the action taken, the cause of the inoperability, and the plans and schedule for restoring the instrument(s) to operable status.

Basis

Operability of the fire detection and actuation instrumentation ensures that adequate warning capability is available for prompt detection of fires and provides for the actuation of automatic isolation and suppression systems which protect various safety related areas of the plant. The capabilities are required in order to detect, locate, isolate and extinguish fires in their early stages. Prompt detection of fires will reduce the potential for

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damage to safety related equipment and is an integral element in the overall facility fire protection program.

In the event that a portion of the fire detection and actuation instrumentation is inoperable, the establishment of frequent fire patrols in the affected areas is required to provide detection capability until the inoperable instrumentation is returned to service.

3.14.2 Fire Suppression Water System

3.14.2.1 The Fire Suppression Water System shall be operable with:

- a. Two high pressure pumps, each with a capacity of 2500 gpm, with their discharge aligned to the yard loop, and
- b. An operable flow path capable of taking suction from the Unit 2 intake structure and transferring the water through distribution piping with operable sectionalizing, or isolation valves.

3.14.2.2 With less than the above required equipment operable:

Restore the inoperable equipment to operable status within seven days or prepare and submit a Special Report to the Commission within the next 30 days outlining the plans and procedures to be used to provide for the loss of redundancy in this system.

3.14.2.3 With no Fire Suppression Water System operable:

- a. Establish a backup fire suppression water system within 24 hours and follow the reporting requirements of Specification 6.6.1, or
- b. Proceed to hot shutdown within twelve hours and be in cold shutdown within the next 24 hours.
- c. Prepare and submit a Special Report to the Commission within 30 days outlining the plans and procedures to be used to establish operability of the system.

3.14.3 Fire Water Pre-Action System

3.14.3.1 The Fire Water Pre-Action Systems in the first floor Auxiliary Building hallway above the instrument and service air compressor and the Containment Vessel Electrical Penetration Area shall be operable:

- a. With no visible water leakage from the spray nozzles,
- b. With the air supply to the system operable,
- c. With automatic initiation logic operable, and
- d. With the system aligned to deliver to the protection area.

3.14.3.2 With the Fire Water Pre-Action Systems in a condition of readiness less than required by the above:

- a. For the Containment Vessel Electrical Penetration Area initiate an inspection once per shift with particular emphasis on identifying any potential hazards for fire.
- b. For all other areas, within one (1) hour establish a continuous fire watch with backup fire suppression equipment for those areas in which redundant systems or components could be damaged; for other areas, establish an hourly fire watch patrol.
- c. Restore the system to operable status within 14 days or prepare and submit a Special Report to the Commission within the next 30 days outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to operable status.

3.14.4 Fire Hose Stations

3.14.4.1 Each fire hose station in Table 3.14.2 shall be operable.

3.14.4.2 With a hose station in Table 3.14.2 inoperable:

- a. Route an additional equivalent capacity hose to the unprotected area from an operable hose station within one hour if the inoperable fire hose is the primary means of fire suppression; otherwise route the additional hose within 24 hours.
- b. Restore the hose station to operable status within 14 days or prepare and submit a Special Report to the Commission within the next 30 days outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to operable status.

3.14.5 CO₂ Fire Protection System

3.14.5.1 The CO₂ Fire Protection Systems for 1) the Diesel Generator Rooms and, 2) North and South Cable Vaults shall be operable, each:

- a. With a complete bank (19 cylinders for the Diesel Generator Room and 18 cylinders in the North and South Cable Vaults) of fully charged CO₂ cylinders in service,
- b. With the system aligned to deliver to the protected areas, and
- c. With automatic initiation logic operable. For the Diesel Generators, this includes two dedicated heat detectors per room for CO₂ actuation.
- d. A CO₂ cylinder shall be deemed fully charged if it contains not less than 90% of the full charge weight.

3.14.5.2 With any of the CO₂ Fire Protection Systems in a condition of readiness less than required by the above:

- a. Within one (1) hour establish a continuous fire watch with backup fire suppression equipment for those areas in which redundant systems or components could be damaged; for other areas, establish an hourly fire watch patrol.
- b. Restore the affected system to operable status within 14 days or prepare and submit a Special Report to the Commission within the next 30 days outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to operable status.
- c. If a diesel generator CO₂ Fire Protection System is inoperable and the affected diesel generator is running, immediately post a continuous fire watch. A continuous fire watch shall be maintained until the CO₂ fire protection system is restored to operability or until the diesel generator has been shut down.

3.14.6 Halon Fire Protection System

3.14.6.1 The Halon Fire Protection System for the Cable Spread Room Emergency Switchgear Room and the Safeguards Room shall be operable:

- a. With a complete bank (10 cylinders, 5 instantaneous and 5 extended discharge) of fully charged Halon cylinders in service.
- b. With the systems aligned to deliver to the protected areas.
- c. With automatic initiation logic operable.
- d. A Halon Cylinder shall be deemed to be fully charged if it contains not less than 90% of its full charge pressure and not less than 95% of its full charge weight.

3.14.6.2 With the Halon Fire Protection System in a condition of readiness less than required by the above:

- a. Within one (1) hour establish a continuous fire watch with fire suppression equipment for those areas in which redundant systems or components could be damaged; for other areas, establish an hourly fire watch patrol.
- b. Restore the system to operable status within 14 days or prepare and submit a Special Report to the Commission within the next 30 days outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to operable status.

Basis:

The operability of the fire suppression systems ensures that adequate fire suppression capability is available to confine and extinguish fires occurring in any portion of the facility where

safety related equipment is located. The fire suppression system consists of the water system, CO₂, Halon, and fire hose stations. The collective capability of the fire suppression systems is adequate to minimize potential damage to safety related equipment and is a major element in the facility fire protection program.

In the event that portions of the fire suppression systems are inoperable, alternate backup fire fighting equipment is required to be made available in the affected areas until the affected equipment can be restored to service.

In the event that the fire suppression water system becomes inoperable, immediate corrective measures must be taken since this system provides the major fire suppression capability of the plant. The requirement for immediate notification to the Commission provides for prompt evaluation of the acceptability of the corrective measures to provide adequate fire suppression capability for the continued protection of the nuclear plant.

3.14.7 Fire Barrier Penetration Fire Seals

3.14.7.1 All penetration fire barriers protecting safety related areas shall be operable when equipment in those areas are required to be operable.

3.14.7.2 With the penetration fire barrier inoperable:

- a. The operability of the fire detection systems providing coverage for the fire areas on either side of the penetration, as applicable, shall be verified within one hour.
- b. If either of the detection systems are inoperable, a continuous fire watch shall be established on at least one side of the affected penetration within one hour.
- c. Restore the inoperable fire barrier penetration(s) to operable status within 7 days or prepare and submit a Special Report to the Commission within the next 30 days outlining the action taken, the cause of the inoperable penetration and plans and schedule for restoring the fire barrier penetration(s) to operable status.

Basis

The operability of the fire barrier penetration seals ensure that fires will be confined or adequately retarded from spreading to adjacent portions of the facility. This design feature minimizes the possibility of a single fire rapidly involving several areas of the facility prior to detection and extinguishment. The fire barrier penetration seals are a passive element in the facility fire protection program and are subject to periodic inspections.

During periods of time when the seals are not operable, verification of fire detection system operability is required to insure that prompt detection capability exists in the vicinity of the penetration barrier. Should an area detection system be inoperable, the fire watch will provide the required protection until the seal is restored to operable status.

TABLE 3.14.1
~~FIRE DETECTION AND ACTIVATION INSTRUMENTATION~~
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<u>FIRE ZONE NO.</u>	<u>ROOM</u>	<u>TRAINS A & B**</u>	<u>TRAIN A*</u>	<u>TRAIN B*</u>
1	Diesel Gen. B	3	1	1
2	Diesel Gen. A	3	1	1
3	SIS Pump	2		
4	Charging Pump	2		
5	Component Cooling	4		
7	Aux. FW Pump	1.		
8	Boron Injection	1		
9	Cable Vault N	1	1	1
10	Cable Vault S	6	1	1
11	Aux. Bldg. Corridor (N) 1st Floor	4		
12	Aux. Bldg. Corridor (Cent.) 1st Floor	4	1	1
13	Aux. Bldg. Corridor (S) 1st Floor	5		

FIRE ZONE

NO.	EQ	TRAINS A & B**	TRAIN A*	TRAIN B*
15	Aux. Bldg. Corridor 2nd Floor	5		
16	Battery Room	2		
17	HVAC Equipment	2		
19	Cable Spread Room #2	6	1	1
20	Emergency Switchgear Room	6		
21	Rod Control Room	2		
22	Control Room	6		
23	Hagan Relay Room	2		
24	Containment Elec. Penetrations	4	1	1
25A	RCP A	1	1	1
25B	RCP B	1	1	1
25C	RCP C	1	1	1
26	HVE-1 HVE-2 HVE-3 HVE-4	1 1 1 1		
27	RRR Pit	2		
28	Pipe Space	6		

* Minimum number of detectors per train needed for suppression actuation.

** Minimum number of detectors needed for area coverage as per NFPA 72-2, 1978.

TABLE 3.14.2
~~DELETED~~
~~HOST STATIONS~~

<u>Location</u>	<u>Elevation</u>
1. Entrance to Cable Spread Room	242
2. Emergency Bus Room	246
3. Waste Disposal Panel Area	226
4. MCC 10 Area	226
5. Primary Water Pump Area	226
6. Boric Acid Batch Tank Room	246
7. Containment Entrance Area	226
8. Hose House Including Hydrant Near Intake Structure	226
9. RHR Pump Area	244
10. Hagan Room	254
11. Pipe Alley	226
12. Outside "C" Reactor Coolant Pump Bay - 1st Level	233
13. Outside "C" Reactor Coolant Pump Bay - 2nd Level	256
14. East of Personnel Hatch Inside C.V. - 1st Level	233
15. East of Personnel Hatch Inside C.V. - 2nd Level	256
16. West of C.V. Elevator - 1st Level	233
17. West of C.V. Elevator - 2nd Level	256
18. At C.V. North Stairwell - 1st Level	233
19. At C.V. North Stairwell - 2nd Level	256

TABLE 4.1-3

FREQUENCIES FOR EQUIPMENT TESTS

	<u>Check</u>	<u>Frequency</u>	<u>Maximum Time Between Tests</u>
1. Control Rods	Rod drop times of all full length rods	Each refueling shutdown	NA*
2. Control Rod	Partial movement of all full length rods	Every 2 weeks during reactor critical operations	20 days
3. Pressurizer Safety Valves	Set point	Each refueling shutdown	NA
4. Main Steam Safety Valves	Set point	Each refueling shutdown	NA
5. Containment Isolation Trip	Functioning	Each refueling shutdown	NA
6. Refueling System Interlocks	Functioning	Prior to each refueling shutdown	NA
7. Service Water System	Functioning	Each refueling shutdown	NA
8. Fire Protection Pump and Power Supply DELETED	Functioning	Monthly	45 days
9. Primary System Leakage	Evaluate	Daily when reactor coolant system is above cold shutdown condition	NA
10. Diesel Fuel Supply	Fuel Inventory	Weekly	10 days
11. Critical Headers of Auxiliary Coolant System	100 Psig Hydrostatic Test	Every five years	6 years
12. Turbine Steam Stop, Control, Reheat Stop, and Interceptor Valves	Closure	Monthly during power operation and prior to startup	45 days

4.14

~~FIRE PROTECTION SYSTEM:~~

~~DELETED~~

Applicability:

Applies to periodic testing and surveillance program for Fire Protection System.

Objective:

To verify the ability of the Fire Protection System components to function as required and to prevent system degradation.

Specification:

4.14.1 Fire Detection Instrumentation

4.14.1.1 Each of the fire detectors in the fire detection zones in Table 3.14.1 shall be demonstrated OPERABLE by performance of a CHANNEL FUNCTIONAL TEST:

- a. During each cold shutdown exceeding 24 hours unless performed in the previous 6 months for Fire Zones 24, 25A, 25B, 25C and 26.
- b. Semi-annually for all other zones.

4.14.1.2 The non-supervised circuits, associated with detector alarms, between the instrument and the main alarm panel shall be demonstrated OPERABLE at least once per 31 days.

4.14.2 Fire Suppression Water System

The Fire Suppression Water System shall be demonstrated OPERABLE:

- a. Monthly on a STAGGERED TEST BASIS by starting each pump from ambient conditions and operating it for PN minutes. Note: $N = 15$ for the electric motor driven fire pump, and $N = 60$ for the diesel engine driven fire pump.
- b. Monthly by verifying that each valve (manual, power operated or automatic) in the flow path is in its correct position.
- c. Annually by cycling each valve in the flow path through at least one complete cycle of full travel.
- d. Every 18 months by performing a system functional test which includes simulated automatic actuation of the system throughout its operating sequence, and:
 1. Verifying that each pump develops at least 2500 gpm at a system pressure of 125 psig.

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2. Verifying that each high pressure pump starts sequentially from ambient conditions to restore the fire suppression water supply pressure to >125 psig and runs for N minutes while loaded with the fire pump. Note: N = 15 for the electric motor driven fire pump, and N = 60 for the diesel engine driven fire pump.

- e. Every 3 years by performing flow tests of the system in accordance with Section 11, Chapter 5 of Fire Protection Handbook, 14th Edition published by National Fire Protection Association.

4.14.3 CO₂ Systems

The CO₂ systems shall be demonstrated OPERABLE:

- a. Semi-annually by verifying the weight of each high pressure cylinder.
- b. Every 18 months, by verifying the system valves and associated ventilation controls actuate automatically and manually, as appropriate, to a simulated actuation signal. A brief flow test or equivalent shall be made to verify flow from each nozzle.

4.14.4 Fire Hose Stations

Each fire hose station listed in Section 3.14 shall be verified OPERABLE:

- a. Monthly by visual inspection of the station to assure all essential equipment is available.
- b. Every 18 months by removing the hose for inspection and re-racking and replacing all gaskets that are degraded in the couplings.
- c. Every three years, partially open each hose station valve to verify operability and no blockage.
- d. Every three years hydrotest the hose at each hose station per NFPA 198 except that the test pressure shall be at least 50 psi greater than the maximum zero flow pressure at that station.

4.14.5 Fire Barrier Penetration Seals

4.14.5.1 Penetration fire barriers shall be verified to be OPERABLE by a visual inspection:

- a. Once per refueling cycle for fire doors and fire dampers.
- b. Electrical penetration fire barrier seals shall be inspected on the following basis:
 1. 10% of all seals shall be inspected per refueling cycle with 100% of all seals being inspected over a period of ten refueling cycles. For each seal found to be degraded an additional 10% of all seals shall be inspected.
- c. Prior to declaring a fire penetration seal OPERABLE following repairs or maintenance.

4.14.6 Fire Suppression Water System

4.14.6.1 The fire pump diesel engine shall be demonstrated OPERABLE:

- a. Monthly by verifying:
 1. The fuel storage tank contains at least 250 gallons of fuel, and
 2. See Specification 4.14.2.a.
- b. Every 18 months by:
 1. Subjecting the diesel engine to an inspection in accordance with procedures prepared in conjunction with its manufacturer's recommendations for the class of services, and
 2. See Specification 4.14.2.d.2.

4.14.6.2 The fire pump diesel engine starting battery bank and charger shall be demonstrated OPERABLE:

- a. Weekly by verifying that:
 1. The electrolyte level of each battery is above the plates, and
 2. The overall battery voltage is ≥ 24 volts.
- b. Quarterly by verifying that the specific gravity is appropriate for continued service of the battery.
- c. Every 18 months by verifying that:
 1. The batteries show no visual indication of physical damage or abnormal deterioration, and
 2. The battery-to-battery and terminal connections are clean, tight, free of corrosion and coated with anti-corrosion material.

4.14.7 Halon System

The Halon System shall be demonstrated OPERABLE:

- a. Semi-annually by verifying the weight and pressure of each high pressure cylinder.
- b. Every 18 months by verifying the system valves and associated ventilation controls actuate automatically and manually as appropriate, to a simulated actuation signal. A brief flow test or equivalent shall be made to verify flow from each nozzle.

Fire Water Pre-Action System

The Fire Water Pre-Action System protecting the Auxiliary Building hallway containing the Instrument and Service Air Compressors and the Containment Electrical Penetration Area shall be demonstrated OPERABLE:

- a. Annually by cycling each testable valve in the flow path through at least one complete cycle of travel.
- b. Every 18 months perform a system functional test which includes simulated automatic actuation of the system and which verifies that the automatic valves in the flow path actuate to their correct positions.
- c. Every 18 months by a visual inspection of each nozzle's spray area to verify the spray pattern is not obstructed.

- f) ALL CORE ALTERATIONS after the initial fuel loading shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator limited to fuel handling who has no other concurrent responsibilities during this operation.

g) ~~DELETED~~
~~A plant fire brigade of at least five members shall be maintained on site at all times. This excludes three members of the minimum shift crew necessary for safe shutdown of the plant and any personnel required for other essential functions during a fire emergency.~~

- h) The shift complement may be one less than the minimum requirement of Section 6.2.3.a and 6.2.3.b for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift members provided immediate action is taken to restore the shift complement to within the minimum requirements of Section 6.2.3.a and 6.2.3.b. This provision does not permit any shift member position to be unmanned upon shift change due to an oncoming shift member being late or absent.

~~Fire brigade may be one less than the minimum requirement of Section 6.2.3.g for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required positions.~~

6.4 TRAINING

6.4.1 A retraining and replacement training program for the plant staff shall be maintained under the direction of the Manager - Training and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55.

4 DELETED
~~6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Manager - Operations and shall meet or exceed the requirements of Section 27 of the NFPA Code 1975, except that training sessions shall be conducted at least quarterly.~~

6.5.1.6.5 A quorum of the PNSC shall consist of the Chairman, and four members, of which two may be alternates.


6.5.1.6.6 The PNSC activities shall include the following:

- a) Perform an overview of Specifications 6.5.1.1 and 6.5.1.2 to assure that processes are effectively maintained.
- b) Performance of special reviews, investigations, and reports thereon requested by the Manager - Nuclear Assessment Department.
- c) Annual review of the Security Plan and Emergency Plan.
- d) Perform reviews of Specifications 6.5.1.1.6, 6.5.1.2.4, 6.5.1.3.1, and 6.5.1.4.1.
- e) Perform review of all reportable events.
- f) Review of facility operations to detect potential nuclear safety hazards.
- g) Review of every unplanned on site release of radioactive material to the environs including the preparation and forwarding of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrences to the Vice President - Robinson Nuclear Project, Manager - Nuclear Assessment Department.
- h) Review of changes to the Process Control Program and the Offsite Dose Calculation Manual.
- i) Review of major changes to radioactive liquid, gaseous, and solid waste treatment systems.
- j) Annual review of the Fire Protection Program, including Program changes.

6.9.2 Deleted

6.9.3 Special Reports

6.9.3.1 Special reports shall be submitted to the NRC within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification:

	<u>Area</u>	<u>Reference</u>	<u>Submittal Date</u>
a)	Containment Leak Rate Testing	4.4	Upon completion of each test.
b)	Containment Sample Tendon Surveillance	4.4	Upon completion of the inspection at 25 years of operation.
c)	Post-Operational Containment Structural Test	4.4	Upon completion of the test at 20 years of operation.
d)	 Fire Protection System	3.14	As specified by limiting condition for operation.
e)	Overpressure Protection System Operation	3.1.2.1.e	Within 30 days of operation.
f)	Auxiliary Feedwater Pump	3.4	Within 30 days after becoming inoperable.

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- a. All non-automatic containment isolation valves not required for normal operation are closed and blind flanges are properly installed where required.
- b. The equipment door is properly closed and sealed.
- c. At least one door in the personnel air lock is properly closed and sealed.
- d. All automatic containment isolation trip valves required to be closed during accident conditions are operable or are secured closed except as stated in Specification 3.6.3. Manual valves qualifying as automatic containment isolation valves are secured closed.
- e. The uncontrolled containment leakage satisfies Specification 4.4.

1.8 QUADRANT POWER TILT

The quadrant power tilt is defined as the ratio of maximum to average of the upper excore detector currents or the lower excore detector currents, whichever is greater. If one excore is out of service, the three in-service units are used in computing the average.

1.9 DELETED

1.10 STAGGERED TEST BASIS

A Staggered Test Basis shall consist of:

- a. A test schedule for n systems, subsystems, trains or designated components obtained by dividing the specified test interval into n equal subintervals.

PAGES 3.14-1 THROUGH 3.14-8 HAVE BEEN DELETED.

(NEXT PAGE IS 3.15-1)

TABLE 4.1-3

FREQUENCIES FOR EQUIPMENT TESTS

		<u>Check</u>	<u>Frequency</u>	<u>Maximum Time Between Tests</u>
1.	Control Rods	Rod drop times of all full length rods	Each refueling shutdown	NA*
2.	Control Rod	Partial movement of all full length rods	Every 2 weeks during reactor critical operations	20 days
3.	Pressurizer Safety Valves	Set point	Each refueling shutdown	NA
4.	Main Steam Safety Valves	Set point	Each refueling shutdown	NA
5.	Containment Iso- lation Trip	Functioning	Each refueling shutdown	NA
6.	Refueling System Interlocks	Functioning	Prior to each refueling shutdown	NA
7.	Service Water System	Functioning	Each refueling shutdown	NA
8.	DELETED			
9.	Primary System Leakage	Evaluate	Daily when reactor coolant system is above cold shutdown condition	NA
10.	Diesel Fuel Supply	Fuel Inventory	Weekly	10 days
11.	Critical Headers of Auxiliary Coolant System	100 Psig Hydro- static Test	Every five years	6 years
12.	Turbine Steam Stop, Control, Reheat Stop, and Interceptor Valves	Closure	Monthly during power operation and prior to startup	45 days

PAGES 4.14-1 THROUGH 4.14-4 HAVE BEEN DELETED.

(NEXT PAGE IS 4.15-1)

- f) ALL CORE ALTERATIONS after the initial fuel loading shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator limited to fuel handling who has no other concurrent responsibilities during this operation.
- g) DELETED
- h) The shift complement may be one less than the minimum requirement of Section 6.2.3.a and 6.2.3.b for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift members provided immediate action is taken to restore the shift complement to within the minimum requirements of Section 6.2.3.a and 6.2.3.b. This provision does not permit any shift member position to be unmanned upon shift change due to an oncoming shift member being late or absent.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the plant staff shall be maintained under the direction of the Manager - Training and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55.

6.4.2 DELETED

6.5.1.6.5 A quorum of the PNSC shall consist of the Chairman, and four members, of which two may be alternates.

6.5.1.6.6 The PNSC activities shall include the following:

- a) Perform an overview of Specifications 6.5.1.1 and 6.5.1.2 to assure that processes are effectively maintained.
- b) Performance of special reviews, investigations, and reports thereon requested by the Manager - Nuclear Assessment Department.
- c) Annual review of the Security Plan and Emergency Plan.
- d) Perform reviews of Specifications 6.5.1.1.6, 6.5.1.2.4, 6.5.1.3.1, and 6.5.1.4.1.
- e) Perform review of all reportable events.
- f) Review of facility operations to detect potential nuclear safety hazards.
- g) Review of every unplanned on site release of radioactive material to the environs including the preparation and forwarding of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrences to the Vice President - Robinson Nuclear Project, Manager - Nuclear Assessment Department.
- h) Review of changes to the Process Control Program and the Offsite Dose Calculation Manual.
- i) Review of major changes to radioactive liquid, gaseous, and solid waste treatment systems.
- j) Annual review of the Fire Protection Program, including Program changes.

6.9.2 Deleted

6.9.3 Special Reports

6.9.3.1 Special reports shall be submitted to the NRC within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification:

	<u>Area</u>	<u>Reference</u>	<u>Submittal Date</u>
a)	Containment Leak Rate Testing	4.4	Upon completion of each test.
b)	Containment Sample Tendon Surveillance	4.4	Upon completion of the inspection at 25 years of operation.
c)	Post-Operational Containment Structural Test	4.4	Upon completion of the test at 20 years of operation.
d)	DELETED		
e)	Overpressure Protection System Operation	3.1.2.1.e	Within 30 days of operation.
f)	Auxiliary Feedwater Pump	3.4	Within 30 days after becoming inoperable.

SIGNIFICANT HAZARDS EVALUATION PURSUANT
TO 10CFR50.92 FOR THE PROPOSED
CHANGES TO THE FIRE PROTECTION TECHNICAL
SPECIFICATIONS AND LICENSE CONDITIONS

The Commission has provided standards in 10CFR50.92(c) for determining whether a significant hazards consideration exists. A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety. Carolina Power & Light Company has reviewed this proposed license amendment request and determined that its adoption would not involve a significant hazards consideration.

Proposed Change No. 1

Replace the fire protection license conditions 3.E with the standard fire protection license condition contained in NRC Generic Letter 86-10.

Proposed Change No. 2

Delete fire protection Technical Specifications 3.14, including tables 3.14.1 and 3.14.2, and associated bases. Delete the fire protection system surveillance requirements contained in Technical Specification 4.14. Delete Technical Specification 1.9, "Fire Suppression Water System."

Proposed Change No. 3

Delete the minimum fire brigade staffing requirement, Technical Specification 6.2.3(g) and (h), and the fire brigade training requirement of Technical Specification 6.4.2. Delete the reporting requirement of Technical Specification 6.9.3.1(d).

Proposed Change No. 4

Add Technical Specification 6.5.1.6.6.(j) for the PNSC to review the Fire Protection Program, including program changes.

Basis

In accordance with Generic Letter 86-10, Carolina Power & Light Company incorporated the fire protection program into the July 1989 FSAR update (Amendment 7) into Section 9.5.1. FSAR Section 9.5.1 documents the evaluation of the H. B. Robinson fire protection program against Appendix A to BTP APCS 9.5-1 and Appendix R to 10CFR50, and includes the major commitments that form the basis for the program. Appendix 9.5.1A contains the Fire Hazards Analysis. In addition, Section 9.5.1 contains the requirements for administrative implementing procedures that replace those which have been proposed for deletion from the Technical Specifications.

Analysis

The proposed amendment consists of four changes:

1. Revision of license condition 3.E.
2. Deletion of Technical Specifications 3.14.1 and 4.14.1, "Fire Detection and Actuation Instrumentation"; 3.14.2 and 4.14.2, "Fire Suppression Water System"; 3.14.3 and 4.14.8, "Fire Water Preaction System"; 3.14.4 and 4.14.4, "Fire Hose Stations"; 3.14.5 and 4.14.3, "CO₂ Fire Protection System"; 3.14.6 and 4.14.7, "Halon Fire Protection System"; 3.14.7 and 4.14.5, "Fire Barrier Penetration Seals"; and associated pages.
3. Deletion of the Fire Brigade Minimum Staffing Requirement, Technical Specification: 6.2.3(g) and (h) and 6.4.2.
4. Addition of PNSC requirements, Technical Specification 6.5.1.6.6.(j).

Carolina Power & Light Company has reviewed the requirements of 10CFR50.92 as they relate to the proposed changes to the fire protection Technical Specifications and license conditions and considers that these changes not to involve a significant hazards consideration. In support of this conclusion, the following analyses are provided:

- A. The proposed changes will not involve a significant increase in the probability or consequences of an accident previously evaluated.

Change 1 The existing license condition requires that the licensee comply with the provisions of the February 28, 1978 Fire Protection Safety Evaluation Report and supplements thereto. The revision of license condition 3.E will require that all provisions of the Fire Protection Program be maintained in effect, and that changes in the program may be made in accordance with the provisions of 10CFR50.59. The new license condition simply changes the criteria by which Carolina Power & Light Company is authorized to make changes to the program without prior NRC approval. The overall objective of the fire protection program and license conditions to ensure safe shutdown of the plant in the event of a fire is preserved. Therefore, the new license conditions are consistent with the objective of the existing license conditions and NRC Generic Letter 86-10. Consequently, these changes will not involve a significant increase in the probability or consequences of an accident previously evaluated.

Change 2 Technical Specification requirements to maintain the fire protection systems have been replaced with the requirements which appear in Section 9.5.1 to the Final Safety Analysis Report (FSAR).

The operability and surveillance requirements are being maintained, as stated in the FSAR, in plant procedures where changes must be evaluated in accordance with 10CFR50.59. Changes to the fire protection program as described in the FSAR and plant procedures may be made only if the changes will not adversely affect the ability to achieve and maintain safe shutdown.

Per Technical Specification 6.5.1.6.6(a) the PNSC performs an overview of the procedure change process to assure that processes are effectively maintained. Additionally, Technical Specification 6.5.1.1.1(f) requires that written procedures be established, implemented and maintained covering the fire protection program implementation. These administrative controls, along with the review and audit requirements of Technical Specifications 6.5.3.2.(d)(7) and 6.5.4, will ensure that changes to the operability and surveillance requirements are performed in accordance with 10CFR50.59 and will not involve an increase in the probability or consequences of an accident or adversely affect the ability to achieve and maintain safe shutdown. Therefore, the deletion of Technical Specifications 3.14.1, 3.14.2, 3.14.3, 3.14.4, 3.14.5, 3.14.6 and 3.14.7, and the associated surveillance requirements of Technical Specifications 4.14.1, 4.14.2, 4.14.3, 4.14.4, 4.14.5, 4.14.6, 4.14.7, and 4.14.8, and the placement of the same operability and surveillance requirements in plant procedures will not involve a significant increase in the probability or consequences of an accident previously evaluated.

Change 3 Technical Specification requirements to maintain the Fire Brigade staffing will be replaced by the requirements which are discussed in detail in Appendix 9.5.1B to the FSAR. This administrative control will be maintained in the FSAR where changes must be evaluated in accordance with 10CFR50.59.

Changes to the fire protection program in the FSAR may be made only if the changes will not adversely affect the ability to achieve and maintain safe shutdown. Per Technical Specifications 6.5.1.6.6(a), the Plant Nuclear Safety Committee (PNSC) will continue to perform the overview of the procedure change process to assure that processes are effectively maintained. Additionally, Technical Specification 6.5.1.1.1(f) requires that written procedures be established, implemented and maintained covering the fire protection program implementation. These established administrative controls will ensure that changes to this requirement are performed in accordance with 10CFR50.59 and will not involve an increase in the probability or consequences of an accident or adversely affect the ability to achieve and maintain safe shutdown. Therefore, the deletion of Technical Specification 6.2.3(g) and (h) and 6.4.2 and the placement of the same requirement into the FSAR will not involve a significant increase in the probability or consequences of an accident previously evaluated.

Change 4 Providing for PNSC and Nuclear Assessment Department (NAD) review of changes to the Fire Protection Program is an administrative function that will maintain program effectiveness.

B. The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

Change 1 The new license conditions will ensure that the ability to achieve and maintain safe shutdown in the event of a fire is preserved. Since these new license conditions are consistent with the objective of the old license conditions, these changes will not create the possibility of a new or different kind of an accident previously evaluated.

Change 2 The requirements to maintain operability of the detection instrumentation, the fire suppression water system, the fire water preaction systems, the CO₂ protection system, and the fire barrier penetrations and to perform surveillance requirements to ensure operability of these systems are retained; these requirements have simply been moved from the Technical Specifications to the FSAR. Plant procedures are being developed from the existing procedures that implement this Technical Specification to provide specific instructions for implementing the operability and surveillance requirements. Therefore, the possibility of a new or different kind of accident from any accident previously evaluated will not be created by these changes.

Change 3 The requirement to maintain minimum fire brigade staffing and training is retained; this requirement has simply been moved from the Technical Specifications to the FSAR. Therefore, the possibility of a new or different kind of accident from any accident previously evaluated will not be created by this change.

Change 4 These changes do not create the possibility of a new or different kind of accident from any accident previously evaluated because the change is programmatic in nature.

C. The proposed changes will not involve a significant reduction in the margin of safety.

Change 1 All modifications identified in the NRC's Safety Evaluation Report, Fire Protection Review, have been dispositioned, as required by the existing license conditions. Section 9.5.1 to the FSAR documents Carolina Power & Light Company's compliance with the fire protection program set forth in Appendix R to 10CFR50 in accordance with the requirements of 10CFR50.48, which is required by the existing license condition. Therefore, all provisions of acceptance in the existing license conditions have been addressed and the adoption of the proposed new license condition simply changes the criterion by which Carolina Power & Light Company is authorized to make changes to the approved program. As discussed in A. above, the new license conditions are consistent with the objective of the existing license conditions.

Change 2 The operability and surveillance requirements are being maintained in the FSAR and plant procedures where changes must be evaluated in accordance with 10CFR50.59. Changes to the fire protection program in the FSAR and plant procedures may be made only if the changes will not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

Additionally, the administrative controls discussed in item A above will ensure that changes to these operability and surveillance requirements are performed in accordance with 10CFR50.59 and will not involve a reduction in a margin of safety or adversely affect the ability to achieve and maintain safe shutdown in the event of a fire. Therefore, the deletion of these technical specifications and the placement of the same operability and surveillance requirements into plant procedures will not involve a significant reduction in the margin of safety.

Change 3 This administrative control will be maintained in the FSAR where changes must be evaluated in accordance with 10CFR50.59. Changes to the fire protection program in the FSAR may be made only if the changes will not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire. Additionally, the established administrative controls discussed in item A above will ensure that changes to this requirement are performed in accordance with 10CFR50.59 and will not involve a reduction in the margin of safety or adversely affect the ability to achieve and maintain safe shutdown in the event of a fire. Therefore, the deletion of this technical specification and the placement of the same operability and surveillance requirements into the FSAR will not involve a significant reduction in the margin of safety.

Change 4 The proposed changes will not involve a reduction in the margin of safety. The 10CFR50.59 process will ensure that PNSC and NAD oversight of changes in the Fire Protection Program is maintained.

Conclusion

Based upon the analysis provided herein, Carolina Power & Light Company has determined that the proposed changes to the Technical Specifications and license conditions will not involve a significant increase in the probability or consequences of an accident previously evaluated, create the possibility of a new or different kind of accident from any accident previously evaluated, or involve a significant reduction in a margin of safety. Therefore, Carolina Power & Light Company has determined that these proposed changes meet the requirements of 10CFR50.92(c) and do not involve a significant hazards consideration.