

ATTACHMENT 1

PROPOSED TECHNICAL SPECIFICATION REVISION

8708170220 870811  
PDR ADOCK 05000269  
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TABLE 3.17-1 (cont'd)

Cable Room	Units 1, 2, and 3
Equipment Room	Units 1, 2, and 3
Cable Shaft (3rd Level)	Units 1, 2, and 3
Cable Shaft (4th & 5th Level)	Units 1, 2, and 3

EMULSIFIRE/SPRAY SYSTEMSKeowee Hydro Station

Main Lube Oil Storage Room

Main Transformer

C. Fire Hose Stations

<u>Location No.</u>	<u>Valve No.</u>	<u>Area or Component Protected</u>
3-D-28	2HPSW-194	1&2 Blockhouse, 1&2 3rd Floor Switchgear
AX-35	1HPSW-436	#1 Cable Spread Room
AX-32	2HPSW-436	#2 Cable Spread Room
AX-33	2HPSW-437	1&2 Cable Spread Room
AX-30	3HPSW-436	#3 Cable Spread Room
AX-31	3HPSW-437	#3 Cable Spread Room
5-M-31	2HPSW-304	1&2 Control Room, 1&2 Emergency Shutdown Panels
TOH-3	3HPSW-338	#3 Control Room, #3 Emergency Shutdown Panel
1-J-28	2HPSW-242	#1 First Floor Motor Control Centers HPSW Pumps, 1&2 LPSW Pumps
1-J-43	3HPSW-344	#3 1st Floor Motor Control Centers
1-B-19	1HPSW-283	#1 EFWP
1-D-39	2HPSW-236	#2 EFWP
1-D-53	3HPSW-336	#3 EFWP
AX-13	1HPSW-448	1&2 HPI Pumps, 1&2 LPI Pumps
AX-14	3HPSW-449	3 HPI Pumps, 3 LPI Pumps
1-J-47	3HPSW-349	3 LPSW Pumps
AX-36	1HPSW-445	#1 West Penetration Room
AX-45	1HPSW-444	#1 East Penetration Room
AX-42	2HPSW-444	#2 East Penetration Room
AX-43	2HPSW-445	#2 West Penetration Room
AX-29	3HPSW-444	#3 East Penetration Room
AX-44	3HPSW-445	#3 West Penetration Room
AX-21	HPSW-457	1+2 Equipment Room
AX-19	3HPSW-358	3 Equipment Room
3-M-24	HPSW-176	1 Equipment Room
3-M-29	2HPSW-245	2 Equipment Room
3-M-43	3HPSW-339	3 Equipment Room

ATTACHMENT 2

TECHNICAL JUSTIFICATION

### Technical Justification:

The attached proposal consists of revisions to Table 3.17-1 (Fire Hose Stations) in the Fire Protection and Detection System technical specification. Presently, there are a number of fire hose stations located inside the Cable Spreading and Equipment Rooms at Oconee. The location number, valve number and the area or component protected by each of the hose stations is listed in Table 3.17-1. The determination has been made that it is not practical to have these fire hose stations inside the rooms where a fire may be occurring. A station modification will relocate some of these hose stations from inside to just outside the entrances to the rooms. This modification will enhance the accessibility of the hose stations in the event of a fire, and will remove portions of the fire protection header from the rooms. With this modification, in the case of a fire in these rooms, fire brigade personnel would not have to enter the room to obtain use of the fire equipment.

For the Cable Spreading Rooms, the modification includes moving AX-35, AX-33, AX-32, AX-30 and AX-31 to stairwell locations outside of the room. The new hose stations will have the same location number and valve number as previously assigned. The fire hose station at location AX-34 is being deleted. Coverage for this entire room (#1 Cable Spreading Room) is being provided by AX-35. In addition the hose station at AX-33 is providing coverage for both the #1 and #2 Cable Spreading Rooms from a common stairwell. The hose stations in the Electrical Equipment rooms are being deleted. Credit for adequate fire protection coverage is being taken for existing hose stations outside of the rooms. Once the hose stations are relocated, all areas of the affected rooms will still be within 100 feet of a hose station thereby maintaining adequate manual fire suppression capability.

Also included in this proposed revision to Table 3.17-1 are corrections to typographical errors. These errors were identified in the descriptions for location numbers, valve numbers and areas protected, and are identified in Attachment 1 with change bars.

ATTACHMENT 3

NO SIGNIFICANT HAZARDS CONSIDERATION EVALUATION

### No Significant Hazards Consideration Evaluation:

Table 3.17-1 of the Oconee Technical Specifications, as proposed, would provide an accurate listing of the manual fire suppression capabilities which are available at Oconee. 10 CFR 50.92 states that a proposed amendment involves no significant hazards considerations if operation in accordance with the proposed amendment would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- (2) Create the possibility of a new or different kind of accident previously evaluated; or
- (3) Involve a significant reduction in a margin of safety.

The proposed amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated. By relocating the hose stations outside of the Cable Spreading Rooms and Electrical Equipment Rooms, the potential for soaking electrical equipment, due to the rupture of pressurized hose systems, is eliminated. The modifications would result in reducing the probability and consequences of this type of accident occurring.

The proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated. The relocated hose stations would be located in stairwells where no other equipment is located.

In addition, the proposed amendment would not involve a significant reduction in a margin of safety. The fire hose stations will be more safe to use once all the hose stations are located outside of the rooms which could potentially contain a fire. Fire brigade personnel will be able to obtain control of the equipment prior to entering the fire hazard area. Also, each room will continue to have complete fire protection coverage by relocating or reassigning the hose stations which are responsible for protection. Once the hose stations are relocated, all areas of the affected rooms will still be within 100 feet of a hose station as committed to in Appendix A to Branch Technical Position 9.5-1.

Based upon this analysis, Duke Power Company concludes that the proposed amendment does not involve significant hazards considerations.