

Attachment A

Remove

4.15-4

Insert

4.15-4

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- d. At least every 3 years by pressure testing each hose to 50 psi greater than the Maximum Working Pressure.

4.15.6 Penetration seals in fire barriers which protect a safety related area shall be verified to be intact by visual inspection:

- a. At least once per 18 months, and
- b. Prior to declaring a penetration seal in a fire barrier intact following repairs or maintenance.

4.15.7 The yard fire hydrant on the southeast corner of the yard loop and its associated hydrant hose house shall be demonstrated OPERABLE:

- a. At least once per 31 days by visual inspection of the hydrant hose house to assure all required equipment is at the hose house.
- b. At least once during March, April or May and once during September, October or November by visually inspecting the yard fire hydrant and verifying that the hydrant barrel is dry and that the hydrant is not damaged.
- c. At least once per 12 months by:
  - (i) Conducting a hose hydrostatic test at a pressure at least 50 psig greater than the maximum pressure available at the yard fire hydrant.
  - (ii) Replacement of all degraded gaskets in couplings.

## Attachment B

On February 14, 1979, the NRC issued a safety evaluation of proposed plant modifications and administrative controls for fire protection. Section 3.1.44 required that exterior fire hydrants be inspected for drainage of their dry barrels immediately prior to freezing winter weather, and for proper function immediately after the winter season. The proposed change to the Technical Specification clarifies this surveillance requirement for inspections during three month periods before and after the winter season.

In accordance with 10CFR 50.91 this change to the Technical Specifications has been evaluated against three criteria to determine if the operation of the facility in accordance with the proposed amendment would:

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 from any accident previously evaluated; or
3. involve a significant reduction in a margin of safety.

The proposed change to the Technical Specification is a clarification that conforms to the provisions of an NRC safety evaluation.

Rochester Gas & Electric submits that the issues associated with this amendment request are outside the criteria of 10CFR 50.91, and therefore, a no significant hazards finding is warranted, because:

- 1) There is no increase in the probability or consequences of an accident previously evaluated.
- 2) There is no possibility of a different kind of accident created.
- 3) The margin of safety remains as previously evaluated and is not reduced.

<sup>1</sup> Letter D.L. Ziemann, NRC to L.D. White, RG&E February 14, 1979.