ATTACHMENT 2 TO AEP:NRC:0692CY

EXISTING TECHNICAL SPECIFICATION
PAGES MARKED TO REFLECT PROPOSED CHANGES

radiation levels and the expected time to perform a visual inspection in each snubber location as well as other factors associated with accessibility during plant operations (e.g., temperature, atmosphere, location, etc.), and recommendations of Regulatory Guides 8.8 and 8.10. The addition or deletion of any snubber shall be made in accordance with Section 50.59 of 10 CFR Part 50.

3/4.7.9 FIRE SUPPRESSION SYSTEMS

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 systems consist of the water system, spray and/or sprinklers, CO_2, 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 one or more CO_2 suppression systems requiring automatic actuation must be isolated for personal protection to permit entry for routine tours, maintenance, construction, or surveillance testing in the protected area, the fire detection system(s) required to be OPERABLE by Specification 3.3.3.7 shall be verified to be OPERABLE. Isolation of an automatic CO_2 suppression system temporarily puts this system in a manual actuation mode.

Reliance on the fire detection system, in conjunction with the ability to manually discharge the CO_2 suppression system will provide adequate fire protection for periods when personnel are required to work in these areas.

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 inoperable equipment is restored to service. When the inoperable fire fighting equipment is intended for use as a backup means of fire suppression, a longer period of time is allowed to provide an alternate means of fire fighting than if the inoperable equipment is the primary means of fire suppression. Backup fire protection equipment will normally take the form of permanently mounted fire extinguishers and/or fire hose stations in or near the area, or fire hoses routed to the affected area. In the event that the fire water tanks become inoperable, Lake Michigan may serve as their backup. Two manual, diesel-engine driven, vertical-turbine fire pumps rated at 2000 gpm, which take suction off of Lake Michigan and provide water to the fire suppression header, are administratively controlled. One of these pumps may serve as a backup to one of the fire suppression pumps that take suction off of the tanks. However, it is not our intent to rely on backup systems or other compensatory measures for an extended period of time and action will be taken to restore the inoperable portions of the fire suppression system to OPERABLE status within a reasonable period.

3/4.4.7.9 (Continued)

The surveillance requirements provide assurance that the minimum OPERABILITY requirements of the fire suppression systems are met. While performing the surveillances specified in 4.7.9.1 the fire suppression water system is still capable of performing its intended function. Consequently, it is not necessary to enter the ACTION STATEMENT specified in 3.7.9.1 while the SURVEILLANCES specified in 4.7.9.1.1 are being performed, unless the tested equipment fails the SURVEILLANCE. In addition, an allowance is made for ensuring a sufficient volume of Halon and CO_2 in the Halon and CO_2 storage tanks by verifying either the weight, level, or pressure of the tanks.

The fire suppression water system has three fire pumps common to both units which discharge into underground ring headers. There is one motor-driven horizontal centrifugal fire pump rated at 2500 gpm that takes suction from the fire water storage tanks; and two diesel-engine-driven horizontal centrifugal fire pumps rated at 2500 gpm that take suction from the fire water storage tanks. Having a combination of diesel-driven and electric motor-driven pumps in the system design is consistent with NRC Branch Technical Position APSCB 9.5-1.

The flow paths capable of taking suction from Lake Michigan are normally isolated to preclude zebra mussel infestation of the system.

The purpose of the charcoal filter fire suppression T/S is to account for detection and suppression of fires in the charcoal filters. Manual operation of these systems is allowed because two-point heat detection with control room and local annunciation of trouble conditions is provided for the charcoal filters. The OPERABILITY of the fire suppression system protecting the charcoal filters is only required when there is charcoal in the filters. Actuation of spray water onto the charcoal filters requires both the manual opening of the system isolation valve and reaching the high temperature alarm setpoint for the automatic opening of the system deluge valve.

Because of the inaccessibility of the lower containment to personnel during operation due to ALARA radiation exposure concerns, the use of one or more CCTVs in the lower containment, to monitor for fire and smoke, is an acceptable substitute to an hourly fire watch, if the fire suppression system becomes inoperable.

All hourly fire watch patrols are performed at intervals of sixty minutes with a margin of fifteen minutes.

A continuous fire watch requires that a trained individual be in the specified area at all times and that each fire zone within the specified area be patrolled at least once every fifteen minutes with a margin of five minutes.

3/4.7.9 (Continued)

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 inoperable equipment is restored to service. When the inoperable fire-fighting equipment is intended for use as a backup means of fire suppression, a longer period of time is allowed to provide an alternate means of fire fighting than if the inoperable equipment is the primary means of fire suppression. Backup fire protection equipment will normally take the form of permanently mounted fire extinguishers and/or fire hose stations in or near the area, or fire hoses routed to the affected area. In the event that the fire water tanks become inoperable, Lake Michigan may serve as their backup. Two manual, diesel-engine driven, vertical-turbine fire pumps rated at 2000 gpm which take suction off of Lake Michigan and provide water to the fire suppression header, are administratively controlled. One of these pumps may serve as a backup to one of the fire suppression pumps that take suction off of the tanks. However, it is not our intent to rely on backup systems or other compensatory measures for an extended period of time and action will be taken to restore the inoperable portions of the fire suppression system to OPERABLE status within a reasonable period.

The surveillance requirements provide assurance that the minimum OPERABILITY requirements of the fire suppression systems are met. While performing the surveillances specified in 4.7.9.1.1 the fire suppression water system is still capable of performing its intended function. Consequently, it is not necessary to enter the ACTION STATEMENT specified in 3.7.9.1 while the SURVEILLANCES specified in 4.7.9.1.1 are being performed, unless the tested equipment fails the SURVEILLANCE. In addition, an allowance is made for ensuring a sufficient volume of Halon and CO_2 in the Halon and CO_2 storage tanks by verifying either the weight, level, or pressure of the tanks.

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The flow paths capable of taking suction from Lake Michigan are normally isolated to preclude zebra mussel infestation of the system.

ATTACHMENT 3 TO AEP:NRC:0692CY

PROPOSED REVISED
TECHNICAL SPECIFICATION PAGES

BASES (Continued)

radiation levels and the expected time to perform a visual inspection in each snubber location as well as other factors associated with accessibility during plant operations (e.g., temperature, atmosphere, location, etc.), and recommendations of Regulatory Guides 8.8 and 8.10. The addition or deletion of any snubber shall be made in accordance with Section 50.59 of 10 CFR Part 50.

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In the event that one or more CO_2 Suppression System requiring automatic actuation must be isolated for personal protection to permit entry for routine tours, maintenance, construction, or surveillance testing in the protected area, the fire detection system(s) required to be operable by Specification 3.3.3.7 shall be verified to be operable. Isolation of an automatic CO_2 suppression system temporarily puts this system in a manual actuation mode.

Reliance on the fire detection system, in conjunction with the ability to manually discharge the CO_2 suppression system will provide adequate fire protection for periods when personnel are required to work in these areas.

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 inoperable equipment is restored to service. When the inoperable fire fighting equipment is intended for use a backup means of fire suppression, a longer period of time is allowed to provide an alternate means of fire fighting than if the inoperable equipment is the primary means of fire suppression. Backup fire protection equipment will normally take the form of permanently mounted fire extinguishers and/or fire hose stations in or near the area, or fire hoses routed to the affected area. However, it is not our intent to rely on backup systems or other compensatory measures for an extended period of time and action will be taken to restore the inoperable portions of the fire suppression system to OPERABLE status within a reasonable period.

BASES

3/4.7.9 (Continued)

The surveillance requirements provide assurance that the minimum OPERABILITY requirements of the fire suppression systems are met. While performing the surveillances specified in 4.7.9.1 the fire suppression water system is still capable of performing its intended function. Consequently, it is not necessary to enter the ACTION STATEMENT specified in 3.7.9.1 while the SURVEILLANCES SPECIFIED IN 4.7.9.1.1 are being performed, unless the tested equipment fails the SURVEILLANCE. In addition, an allowance is made for ensuring a sufficient volume of Halon and CO_2 in the Halon and CO_2 storage tanks by verifying either the weight, level, or pressure of the tanks.

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3/4.7.9 (Continued)

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