

Technical Specification Change Request No. 52 [Appendix A]

Replace page 6-1 with the attached revised page 6-1.

Proposed Change

Change the size of the Fire Brigade in Specification 6.2.2.f from 4 members to 5 members.

Reason for Proposed Change

On August 28, 1979 (received September 4, 1979), the NRC requested that Florida Power Corporation propose an amendment to Facility Operating License No. DPR-72 to change the minimum size of the fire brigade contained in the Technical Specifications for Crystal River Unit No. 3 to five members. (This will be effective within 90 days of the issuance of the amendment.)

Safety Analysis Justifying the Proposed Change

On December 19, 1979, Florida Power Corporation submitted to the NRC a justification for a four member fire brigade. The NRC has concluded, based on the possible demands that may be placed on the brigade and the consequent actions that may be required of the brigade to fight fires, that five members constitute the minimum acceptable fire brigade size. Furthermore, because the staff believes that the fire brigade at each facility should consist of a minimum of five persons, the NRC is preparing a proposed change to 10 CFR Part 50 which would incorporate this minimum fire brigade shift size in the Commission's regulations as a requirement for each operating license. Until this is complete, the NRC feels that it is prudent for Florida Power Corporation to have such a requirement in the Technical Specifications for Crystal River Unit 3.

The proposed change provides additional assistance, in the event of a fire emergency, to what we presently feel is an adequate onsite fire brigade.

No requirement applicable to the Safety Analysis are diminished by the proposed change and no unreviewed safety question is involved.

## 6.0 ADMINISTRATIVE CONTROLS

### 6.1 RESPONSIBILITY

6.1.1 The Nuclear Plant Manager shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 The Nuclear Plant Manager shall be responsible for an annual fire protection inspection which shall be performed utilizing either qualified offsite licensee personnel or an outside fire protection firm. The inspection shall consist of: a) an inspection of safety-related areas of the Plant to verify that they are in conformance with the fire hazards analysis; and b) a review of the Fire Brigade organization, training, and drills to verify their conformance with the requirements of Section 27 of the NFPA Code-1976.

6.1.3 The Nuclear Plant Manager shall be responsible for an inspection of the fire protection program to be performed by a qualified outside fire consultant at least once per 36 months.

### 6.2 ORGANIZATION

#### OFFSITE

6.2.1 The offsite organization for facility management and technical support shall be as shown on Figure 6.2-1.

#### FACILITY STAFF

6.2.2 The Facility organization shall be as shown on Figure 6.2-2 and:

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Operator shall be in the control room when fuel is in the reactor.
- c. At least two licensed Operators shall be present in the control room during reactor start-up, scheduled reactor shutdown and during recovery from reactor trips.
- d. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.
- e. 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.
- f. A Fire Brigade of at least 5 members shall be maintained onsite at all times. This exclude 5 members of the minimum shift crew necessary for safe shutdown of the plant and personnel required for other essential functions.