

Docket No. 50-423
B13582

Attachment 1

Millstone Nuclear Power Station, Unit No. 3
Proposed Changes to Technical Specifications

July 1990

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PLANT SYSTEMS

CO₂ SYSTEMS

LIMITING CONDITION FOR OPERATION

3.7.12.3 The following CO₂ Systems shall be OPERABLE:

- a. A Emergency Generator Fuel Oil Tank Vault, (*)
- b. B Emergency Generator Fuel Oil Tank Vault, (*)
- c. North Electrical Tunnel, (*)
- d. South Electrical Tunnel, (*)
- e. Cable Spreading Room,
- f. West Switchgear Room, (*)
- g. East Switchgear Room, (*)
- h. A MCC and Rod Control Area, (*) and
- i. B MCC and Rod Control Area, (*)

APPLICABILITY: Whenever equipment protected by the CO₂ Systems is required to be OPERABLE.

ACTION:

- a. With the cable spreading room CO₂ system not OPERABLE, within 1 hour establish a continuous fire watch with backup fire suppression equipment.
- b. With one or more of the above required CO₂ systems (as indicated by asterisk(*)) not OPERABLE, within 1 hour verify that the fire barrier between adjacent areas is OPERABLE, and:
 1. If the fire barrier is OPERABLE, establish an hourly fire watch patrol for the affected area, or
 2. If the fire barrier is not OPERABLE, establish a continuous fire watch for the affected area.
- c. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.12.3.1 Each of the above required CO₂ Systems shall be demonstrated OPERABLE at least once per 31 days by verifying that each valve (manual, power-operated, or automatic) in the flow path is in its correct position.

PLANT SYSTEMS

BASES

3/4.7.11 SEALED SOURCE CONTAMINATION (Continued)

plutonium. This limitation will ensure that leakage from Byproduct, Source, and Special Nuclear Material sources will not exceed allowable intake values.

Sealed sources are classified into three groups according to their use, with Surveillance Requirements commensurate with the probability of damage to a source in that group. Those sources which are frequently handled are required to be tested more often than those which are not. Sealed sources which are continuously enclosed within a shielded mechanism (i.e., sealed sources within radiation monitoring or boron measuring devices) are considered to be stored and need not be tested unless they are removed from the shielded mechanism.

3/4.7.12 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 System consists of the water system, spray, and/or sprinklers, CO₂, Halon, fire hose stations, and yard fire hydrants.

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 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.

In the event that the Fire Suppression System in the Cable Spreading Room is inoperable, a continuous fire watch is required due to the presence of redundant safe shutdown systems and/or components in the Cable Spreading Room that could be damaged by a common fire. The criteria for redundancy is described in Branch Technical Position (BTP) 9.5-1.

The Surveillance Requirements provide assurance that the minimum OPERABILITY requirements of the Fire Suppression Systems are met. An allowance is made for ensuring a sufficient volume of Halon in the Halon storage tanks by verifying either the weight or the level of the tanks. Level measurements are made by either a U.L. or F.M. approved method.

In the event 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.

PLANT SYSTEMS

BASES

3/4.7.13 FIRE RATED ASSEMBLIES

The functional integrity of the fire rated assemblies and barrier penetrations ensures that fires will be confined or adequately retarded from spreading to adjacent portions of the facility. These design features minimize the possibility of a single fire rapidly involving several areas of the facility prior to detection and extinguishing of the fire. The fire barrier penetrations are a passive element in the facility Fire Protection Program and are subject to periodic inspections.

Fire barrier penetrations, including cable penetration barriers, fire doors and dampers are considered functional when the visually observed condition is the same as the as-designed condition. For those fire barrier penetrations that are not in the as-designed condition, an evaluation shall be performed to show that the modification has not degraded the fire rating of the fire barrier penetration.

During periods of time when a barrier is not functional, either: (1) a continuous fire watch is required to be maintained in the vicinity of the affected barrier, or (2) the fire detectors on at least one side of the affected barrier must be verified OPERABLE and an hourly fire watch patrol established until the barrier is restored to functional status.

3/4.7.14 AREA TEMPERATURE MONITORING

The area temperature limitations ensure that safety-related equipment will not be subjected to temperatures in excess of their environmental qualification temperatures. Exposure to excessive temperatures may degrade equipment and can cause a loss of its OPERABILITY. The temperature limits include an allowance for instrument error of $\pm 2.2^{\circ}\text{F}$.

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Attachment 2

Millstone Nuclear Power Station, Unit No. 3

Description of Proposed Changes to Technical Specifications

July 1990

Millstone Nuclear Power Station, Unit No. 3
Description of Proposed Changes to Technical Specifications

A. Description of Changes

1. Section 3.7.12.3

- a. In the listing of CO₂ systems required to be operable, an asterisk has been added to each individual system listed that does not protect areas where redundant safe shutdown equipment or components are located.
- b. In the Action Statement, existing Part (a) has been revised and written as Part (a) and Part (b). The Cable Spreading Room is the only single area where redundant safe shutdown equipment or components are located that have the potential to be damaged by a single fire. The Action for inoperability of the CO₂ System protection in this area has not been changed, but now is specifically identified as new Part (a). New Part (b), which identifies those other areas where redundant safe shutdown equipment do not pass through a single area, now requires the verification of the operability of the fire barriers between the adjacent areas before establishing an hourly fire watch patrol. Additionally, this part now requires the establishment of a continuous fire watch if the integrity of the fire barriers is questionable and actually provides a higher level of protection than was previously provided by this Technical Specification.
- c. Existing Part (b) is now identified as Part (c) to account for the new expanded Parts (a) and (b). In addition, the applicability of Specification 3.0.4 has been removed to reflect changes previously submitted to the NRC Staff in a letter dated July 17, 1990.

2. Bases Section 3/4.7.12

A new paragraph has been added to the Fire Suppression System bases to more fully describe the bases for the requirement of a continuous fire watch for the Cable Spreading Room. In addition, Branch Technical Position (BTP) 9.5-1 has been identified as the source providing the criteria for redundancy as it applies to safe shutdown equipment required to be available in the event of a fire.

3. Other Changes

Because of the addition of a new paragraph in Bases Section 3/4.7.12 on page B 3/4 7-7, existing Bases Section 3/4.7.13, Fire Rated

Assemblies, which begins on this page, has now been moved in its entirety to the next page, B 3/4 7-8. No changes to the content or information in this section have been made.

B. Evaluation of Changes

The proposed changes are mainly for clarification only and do not include any hardware modifications. In fact, the requirement to now verify operability of fire barriers for certain areas provide for a higher level of protection than was previously provided. As such, there are no credible failure modes associated with these changes.

The existing Technical Specification leaves the determination of which areas may require a continuous fire watch or only a fire watch patrol subject to interpretation. The proposed revised Technical Specification now specifically identifies the single area where redundant safe shutdown equipment or components are located and removes this element of interpretation. In addition, this proposed Technical Specification now requires the verification of fire barriers for certain areas, along with the requirement for a continuous fire watch if the integrity of the fire barriers are questionable, for those areas that previously would have only required an hourly fire watch patrol.

The proposed Technical Specification clarifies the method and frequency of fire watches when any CO₂ fire suppression system is inoperable by specifically identifying fire watch requirements and increases the level of fire protection by now requiring the verification of the integrity of fire barriers. As such, the changes do not affect the current coverage or operability status of the CO₂ fire suppression systems and will not affect the design, testing, or surveillance requirements of the CO₂ systems in any way. Additionally, there are no new failure modes associated with the proposed changes, and no design basis accidents are affected.

The proposed changes do not increase the probability of any accident, and therefore the probability of a beyond design basis accident has not been increased to the point where it should be considered within the design basis due to these changes. Based on this, the proposed changes do not affect the consequences of any design basis accidents. In addition, there are no impacts on event consequences, and therefore these changes do not impact protective boundaries.

NNECO has reviewed the proposed changes in accordance with 10CFR50.92 and, based on the above, has concluded that the changes do not involve a significant hazards consideration in that these changes would not:

1. Involve a significant increase in the probability of occurrence or the consequences of an accident previously identified. The proposed changes only provide clarification of the current requirements and

have no impact on the probability of occurrence or consequences of an accident previously identified.

2. Create the possibility of a new or different kind of accident from any previously analyzed. No new failure modes are introduced by these proposed changes, and since there is no change in the way the plant is operated, the potential for an unanalyzed accident is not created.
3. Involve a significant reduction in a margin of safety. The proposed changes do not impact any safety limits and do not affect the consequences of any accident previously analyzed. Therefore, there is no reduction in a margin of safety.