

PLANT SYSTEMSSURVEILLANCE REQUIREMENTS (Continued)

- d. At least once per 6 months for the first year and then at least once per 3 years by performance of a yard loop and hydrant flush,
- e. At least once per 12 months by cycling each testable valve in the flow path through at least one complete cycle of full travel,
- f. At least once per 18 months by performing a system functional test which includes simulated automatic actuation of the system throughout its operating sequence, and:
  - 1) Verifying that each pump develops at least 1500 gpm at a system head of 135 psig,
  - 2) Verifying each pump delivers at least 2250 gpm at a system pressure of 105 psig,
  - 3) Cycling each valve in the flow path that is not testable during plant operation through at least one complete cycle of full travel, and
  - 4) Verifying that each fire suppression pump starts (sequentially) on decreasing pressure in the fire suppression header at a header pressure greater than or equal to 110 psig.
- g. At least once per 3 years by performing a flow test of the system in accordance with Chapter 5, Section 11 of the Fire Protection Handbook, 14th Edition, published by the National Fire Protection Association.

## 4.7.10.1.2 Each fire pump diesel engine shall be demonstrated OPERABLE:

- a. At least once per 31 days by verifying:
  - 1) The fuel oil day tank level contains at least 175 gallons of fuel, and
  - 2) The diesel starts from ambient conditions and operates for at least 30 minutes on recirculation flow.
- b. At least once per 92 days by verifying that a sample of diesel fuel from the fuel oil day tank, obtained in accordance with ASTM-D270-1975, is within the acceptable limits specified in Table 1 of ASTM-D975-1977 when checked for viscosity, water, and sediment; and
- c. At least once per 18 months, ~~during shutdown~~, by subjecting the diesel to an inspection in accordance with procedures prepared in conjunction with its manufacturer's recommendations for the class of service.

SAFETY EVALUATION

AND

SIGNIFICANT HAZARDS CONSIDERATION

This amendment request revises Technical Specification 4.7.10.1.2.c to allow the 18-month inspection of fire pump diesel engines be performed when the plant is at power. The Callaway Plant's fire suppression water system has three 1500 gpm pumps. Two are diesel-driven and one has an electric drive. Per Technical Specification 3.7.10.1 and the system design, only two fire suppression pumps are required to meet the Limiting Condition for Operation (LCO). Therefore one diesel-driven pump out-of-service for inspection of the engine is consistent with the LCO in all modes of operation. Appropriate action statements are provided in the event the LCO cannot be met.

Pursuant to the information above, the proposed revision to Technical Specification 4.7.10.1.2.c does not adversely affect or endanger the health or safety of the public and does not involve an unreviewed safety question.

The Commission has provided guidance concerning the application of the standards in 10CFR50.92 by providing certain examples (48FR14870). This amendment request is similar to the example of a purely administrative change to the technical specifications; specifically a change to achieve consistency throughout the specifications.

This amendment request does not involve a significant increase in the probability or consequences of an accident previously evaluated; nor create the possibility of a new or different kind of accident from any accident previously evaluated; nor involve a reduction in the required margin of safety. Based on the foregoing, the requested amendment does not present a significant hazard.