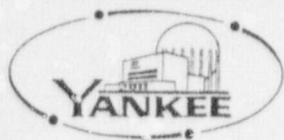
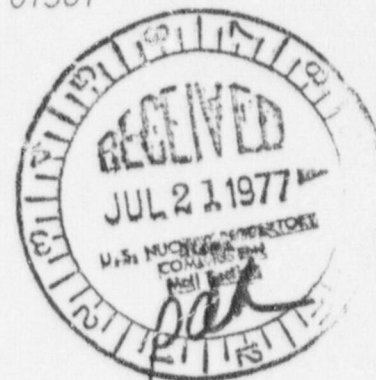


YANKEE ATOMIC ELECTRIC COMPANY

20 Turnpike Road Westborough, Massachusetts 01581

Regulatory Docket File

July 18, 1977



United States Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Office of Nuclear Reactor Regulation

- Reference:
- (1) License No. DPR-3 (Docket No. 50-29)
 - (2) USNRC letter to R. H. Groce from A. Schwencer, dated 12/1/76, Subject: Technical Specifications for Fire Protection Systems
 - (3) Supplement to letter described in Reference (2) USNRC to R. Groce dated 12/8/76
 - (4) YAEC letter from J.L. French to USNRC dated 1/31/77 in response to Reference (2)
 - (5) YAEC letter from D.E. Vandenburg to USNRC dated 3/18/77, Subject: Technical Specifications for Fire Protection Systems (Proposed Change No. 150)
 - (6) USNRC letter to R.H. Groce from A. Schwencer, dated June 17, 1977, Subject: Revised Model Technical Specifications for Fire Protection Systems

Subject: Fire Protection

Dear Sir:

Pursuant to Section 50.59 of the Commission's rules and regulations, and in accordance with Reference (6), Yankee Atomic Electric Company hereby requests the following changes to the Technical Specifications:

PROPOSED CHANGE: Reference is made to Appendix A of Operating License No. DPR-3 issued to the Yankee Atomic Electric Company for the Yankee Rowe Plant. We propose to modify the Technical Specifications as follows:

Reference (5) provided Technical Specifications for Fire Protection Systems for the Yankee Rowe Plant. Based on your letter of June 17, 1977, (Reference (6)) we are now revising our referenced submittal to be consistent with the revised model Standard Technical Specifications for Fire Protection. These specifications are presented as Attachment "B" to this letter.

Deviations from the approved Model Standard Technical Specifications are presented as Attachment "A".

THIS DOCUMENT CONTAINS
POOR QUALITY PAGES

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H. H. H.

July 18, 1977
Page Two

Armand R. Soucy
Armand R. Soucy Notary Public
My Commission Expires September 9, 1977

Attachment A

Justification for Departure from the Model Technical Specifications for Fire Protection System

<u>Y-R Tech. Spec.</u>	<u>Model Tech. Spec.</u>	<u>Departure/Justification</u>
Deletion	4.3.3.8.2	Yankee Rowe has no NFPA Code 72D Class A supervised circuits.
Deletion	3.7.1.1.b	The Yankee Rowe fire suppression water system incorporates a single water source (Sherman Pond) versus separate water supplies.
4.7.10.1.b	4.7.11.1.b	The fire pumps at Y.R. contain no recirculation feature.
4.7.10.1.c	4.7.11.1.c	There are no testable automatic valves required to operate during actuation of the fire suppression water system at Y.R.
4.7.10.1.d	4.7.11.1.d	A semiannual flush is not required by local water conditions.
4.7.10.1.e	4.7.11.1.f	System flow testing and flushing is performed on a refueling interval basis.
3.7.10.2 ACTION level a.	3.7.11.2 ACTION level a.	The requirement for a continuous fire watch has been replaced with establishment of a roving patrol to check the affected area(s) hourly. The Y.R. water spray system is not automatically initiated. Therefore, even with the system inoperable, no automatic protection has been lost. Provision of backup equipment, as required by other parts of this spec., is sufficient to restore the level of protection to basically what it was prior to the failure.
Deletion	4.7.11.2.b.1	The water spray system at Y.R. is a manually actuated system and as such includes no automatic valves.
3.7.10.3 ACTION level a.	3.7.11.3 ACTION level a.	The requirement for a continuous fire watch has been replaced with establishment of a roving patrol to check the affected area(s) hourly. The Y.R. CO ₂ system is not automatically initiated. Therefore, even with the system inoperable, no automatic protection has been lost. Provision of backup equipment, as required by other parts of this spec., is sufficient to restore the level of protection to basically what it was prior to the failure.

<u>Y-R Tech. Spec.</u>	<u>Model Tech. Spec.</u>	<u>Departure/Justification</u>
4.7.10.3.a	4.7.11.3.a	The CO ₂ cylinders at Y.R. are checked by verification of the contained weight of CO ₂ . This surveillance is performed on a refueling interval basis i.e. 18 months.
Deletion	3.7.11.4	Yankee Rowe has no Halon system.
Deletion	4.7.11.4	Same as 3.7.11.4 above.
3.7.11	3.7.12 ACTION level a.	The requirement for a continuous fire watch has been replaced with establishment of a roving patrol to check the affected area(s) hourly. The reduction of fire protection capabilities inherent in a non-functional penetration barrier is not sufficient to warrant a continuous fire watch. The provision of a roving patrol is consistent with other requirements of this specification.

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DEFINITIONS

the sum of the average beta and gamma energies per disintegration (in MeV) for isotopes, other than iodines, with half lives greater than 30 minutes, making up at least 95% of the total non-iodine activity in the coolant.

FIRE SUPPRESSION WATER SYSTEM

1.27 A FIRE SUPPRESSION WATER SYSTEM shall consist of: a water source; pump; and distribution piping with associated sectionalizing control or isolation valves.

INSTRUMENTATION

FIRE DETECTION

LIMITING CONDITION FOR OPERATION

3.3.3.4 The fire detection instrumentation for each fire detection zone shown in Table 3.3-5 shall be OPERABLE.

APPLICABILITY At all times when equipment in that fire detection zone is required to be OPERABLE.

ACTION:

With the number of OPERABLE fire detection instruments less than required by Table 3.3-6:

1. Within 1 hour, establish a fire watch patrol to inspect the zone with the inoperable instrument(s) at least once per hour, and
2. Restore the inoperable instrument(s) to OPERABLE status within 14 days or prepare and submit a special report to the Commission pursuant to Specification 6.9.6 within the next 10 days outlining the cause of the malfunction and the plans for restoring the instrument(s) to OPERABLE status.
3. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.4.1 Each of the above fire detection instruments shall be demonstrated OPERABLE:

- a. At least once per 6 months by a CHANNEL FUNCTIONAL TEST, and
- b. At least once per 12 months by performance of a Channel Calibration.

TABLE 3.3-6

FIRE DETECTION INSTRUMENTS
(NOTIFIER SYSTEM)

INSTRUMENT LOCATION	MINIMUM INSTRUMENTS OPERABLE
1. Control Room	5
2. Cable Spreading Cable Tray House Batteries No. 3	2 1
3. Switchgear Room	9
4. Diesel Generators No. 1 No. 2 No. 3	1 1 1
5. Safety Injection Pumps & No. 3 Battery	2

PLANT SYSTEMS

FIRE SUPPRESSION

WATER SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.10.1 THE FIRE SUPPRESSION WATER SYSTEM shall be OPERABLE with:

- a. 2 high pressure pumps each with a capacity of 1000 gpm. with their discharge aligned to the fire suppression header.
- b. Automatic initiation logic for each fire pump.

APPLICABILITY: At all times.

ACTION:

- a. With less than the above required equipment, restore the inoperable equipment to OPERABLE status within 7 days or prepare and submit a Special Report to the Commission pursuant to Specification 6.9.6 within the next 10 days outlining the plans and procedures to be used to provide for the loss of redundancy in this system.
- b. With no FIRE SUPPRESSION WATER SYSTEM OPERABLE, within 24 hours:
 1. Establish a backup FIRE SUPPRESSION WATER SYSTEM.
 2. Notify the Commission pursuant to Specification 6.9.6 outlining the actions taken and the plans and schedule for restoring the system to OPERABLE status.
- c. Restore the FIRE SUPPRESSION WATER SYSTEM to OPERABLE status within 14 days or prepare and submit a Special Report to the Commission pursuant to Specification 6.9.6 within the next 10 days outlining the cause of the malfunction and the plans for restoring the system to OPERABLE status.

PLANT SYSTEMS

FIRE SUPPRESSION

WATER SYSTEM

SURVEILLANCE REQUIREMENTS (continued)

1.7.10.1 THE FIRE SUPPRESSION WATER SYSTEM shall be demonstrated OPERABLE:

- a. At least once per 7 days by verifying the water supply volume.
- b. At least once per 31 days on a STAGGERED TEST BASIS by starting each pump.
- c. At least once per 92 days by checking OPEN the principal header and component isolation valves.
- d. At least once per 18 months by performance of a system flush.
- e. At least once per 18 months:
 1. By performing a system functional test which includes simulated automatic start of the pumps, and
 2. By verifying that each pump develops at least 1000 gpm at a system pressure of 125 psig.

PLANT SYSTEMS

SPRAY AND/OR SPRINKLER SYSTEMS

LIMITING CONDITION FOR OPERATION

3.7.10.2 The following spray and/or sprinkler systems located in the following area shall be OPERABLE:

- a. CABLE TRAY HOUSE SPRAY SYSTEM.

APPLICABILITY: At all times when equipment in the area is required to be OPERABLE.

ACTION:

- a. With a spray and/or sprinkler system inoperable establish a roving fire patrol to check the affected area(s) at least once per hour, and provide backup fire suppression equipment to the area(s).
- b. Restore the system to OPERABLE status within 14 days or prepare and submit a Special Report to the Commission pursuant to Specification 6.9.6 within the next 10 days outlining the cause of inoperability and the plans for restoring the system to OPERABLE status.

SURVEILLANCE REQUIREMENTS

4.7.10.2 The spray and/or sprinkler systems shall be demonstrated to be OPERABLE:

- a. At least once per 92 days by cycling each testable valve through one complete cycle.
- b. At least once per 18 months:
 - 1. By inspection of spray headers to verify their integrity.
 - 2. By inspection of each nozzle to verify no blockage.
- c. At least once per 3 years by performing an air flow test through each spray/sprinkler header and verifying each spray/sprinkler nozzle is unobstructed.

PLANT SYSTEMS

CO₂ SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.10.3 The CO₂ system located in Manhole #3 shall be OPERABLE with a minimum weight of 213.5 pounds in the main CO₂ cylinder and 194.5 pounds in the auxiliary CO₂ cylinder.

APPLICABILITY: At all times when the equipment in the area is required to be OPERABLE.

ACTION:

- a. With the CO₂ system inoperable, establish a roving fire patrol to check the affected area(s) at least once per hour, and provide backup fire suppression equipment to the area(s).
- b. Restore the system to OPERABLE status within 14 days or prepare and submit a Special Report to the Commission pursuant to Specification 6.9.6 within the next 10 days outlining the cause of inoperability and the plans for restoring the system to OPERABLE status.

SURVEILLANCE REQUIREMENTS

4.7.10.3 The CO₂ system shall be demonstrated OPERABLE:

- a. At least once per 18 months by verifying the weight of each CO₂ cylinder.
- b. At least once per 18 months by verifying the system valves actuate manually. A brief flow test shall be made to verify flow from each nozzle. ("Puff Test").

PLANT SYSTEMS

FIRE HOSE STATIONS

LIMITING CONDITIONS FOR OPERATION

3.7.10.4 The following fire hose stations shall be OPERABLE:

1. Outside the northwest door of the control room.
2. Outside the northeast door of the control room.

APPLICABILITY: At all times when the equipment in the area is required to be OPERABLE.

ACTION:

With a hose station inoperable, route an additional equivalent capacity hose to the unprotected area from an OPERABLE hose station within 1 hour.

SURVEILLANCE REQUIREMENTS

4.7.10.4 Each fire hose station shall be verified OPERABLE:

- a. At least once per 31 days by visual inspection of the station to assure all equipment is available and the pressure in the standpipe is within limits.
- b. At least once per 18 months by removing the hose for inspection and re-racking.
- c. At least once per 3 years, partially open each hose station valve to verify valve operability and no blockage.

PLANT SYSTEMS

FIRE BARRIERS PENETRATION FIRE SEALS

LIMITING CONDITION FOR OPERATION

3.7.11 All penetration fire barriers protecting safety related areas shall be functional.

APPLICABILITY: At all times.

ACTION:

- a. With a penetration fire barrier non-functional, a roving fire patrol shall be established within 1 hour to check the affected area(s) at least once per hour.
- b. The provisions of 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.11.1 Penetration fire barriers shall be verified to be functional by a visual inspection:

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

4.7.11.2 Penetration fire barriers that perform a pressure sealing function shall be verified to be functional by performance of a local leakage test prior to declaring a penetration fire barrier functional following repairs or maintenance.

INSTRUMENTATION

BASES

3/4.3.3.2 CORE DETECTION SYSTEM

The OPERABILITY of the core detection system with the specified minimum complement of equipment ensures that the measurements obtained from use of this system accurately represent the reactor core power distribution. The OPERABILITY of the neutron detectors is demonstrated prior to use by irradiating each detector to be used and normalizing their outputs.

3/4.3.3.3 METEOROLOGICAL INSTRUMENTATION

The OPERABILITY of the meteorological instrumentation ensures that sufficient meteorological data is available for estimating potential radiation doses to the public as a result of routine or accidental release of radioactive materials to the atmosphere. This capability is required to evaluate the need for initiating protective measure to protect the health and safety of the public (and is consistent with the recommendations of Regulatory Guide 1.23, "Onsite Meteorological Programs").

3/4.3.3.4 FIRE DETECTION INSTRUMENTATION

OPERABILITY of the fire detection instrumentation ensures that adequate warning capability is available for the prompt detection of fires. This capability is required in order to detect and locate fires in their early stages. Prompt detection of fires will reduce the potential for damage to safety related equipment and is an integral element in the overall facility fire protection program.

In the event that a portion of the fire detection instrumentation is inoperable, the establishment of frequent fire patrols in the affected areas is required to provide detection capability until the inoperable instrumentation is returned to service.

PLANT SYSTEMS

BASES

3/4.7.10 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, 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 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 affected equipment can be restored to service.

In the event that 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. The requirement for a twenty-four hour report to the Commission provides for prompt evaluation of the acceptability of the corrective measures to provide adequate fire suppression capability for the continued protection of the nuclear plant.

3/4.7.11 FIRE BARRIER PENETRATION SEALS

The functional integrity of the fire barrier penetration seals ensures that fires will be confined or adequately retarded from spreading to adjacent portions of the facility. This design feature minimizes the possibility of a single fire rapidly involving several areas of the facility prior to detection and extinguishment. The fire barrier penetration seals are a passive element in the facility fire protection program and are subject to periodic inspections.

During periods of time when the seals are not functional, a fire patrol is required to be maintained until the affected seal is restored to functional status.

6.0 ADMINISTRATIVE CONTROLS (Continued)

- 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 2 members shall be maintained on-site at all times. This excludes 2 members of the minimum shift crew necessary for safe shutdown of the plant and any personnel required for other essential functions during a fire emergency.

ADMINISTRATIVE CONTROLS

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff listed below shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions.

- a. Plant Superintendent
- b. Assistant Plant Superintendent
- c. Chemistry and Health Physics Supervisor
- d. Operations Supervisor
- e. Reactor Engineer
- f. Maintenance Supervisor
- g. Instrument and Controls Supervisors
- h. Shift Supervisors
- i. Plant Health Physicist

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Training Coordinator and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55.

6.4.2 A training program for the fire brigade shall be maintained under the direction of a member of the plant staff appointed to perform the duties of Fire Protection Coordinator and shall meet or exceed the requirements of Section 27 of the NFPA Code - 1976.

6.5 REVIEW AND AUDIT

6.5.1 PLANT OPERATION REVIEW COMMITTEE

FUNCTION

6.5.1.1 The Plant Operation Review Committee (PORC) shall function to advise the Plant Superintendent on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The Plant Operation Review Committee shall be composed of the:

- Chairman: Plant Superintendent
Vice Chairman: Assistant Plant Superintendent

ADMINISTRATIVE CONTROLS

- b. The performance, training and qualification of those members of the facility staff who have a direct relationship to operation, maintenance or technical aspects of the plant, at least once per 12 months, $\pm 25\%$.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per 6 months, $\pm 25\%$.
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months, $\pm 25\%$.
- e. The Facility Emergency Plan and implementing procedures at least once per 24 months, $\pm 25\%$.
- f. The Facility Security Plan and implementing procedures at least once per 24 months, $\pm 25\%$.
- g. The Facility Fire Protection Program and implementing procedures at least once per 24 months, $\pm 25\%$.
- h. Any other area of facility operation considered appropriate by the NSAR Committee or the Vice President.

AUTHORITY

6.5.2.10 The NSAR Committee shall report to and advise the Vice President on those areas of responsibility specified in Sections 6.5.2.8 and 6.5.2.9.

RECORDS

6.5.2.11 Minutes of each NSAR Committee meeting shall be prepared and forwarded to the Vice President and each member of the Committee for review within 20 working days following each meeting. The meeting minutes shall include, where applicable, reports of reviews encompassed by Section 6.5.2.8; and reports of audits encompassed by Section 6.5.2.9. The review of the minutes shall be completed within 60 days of the date of their distribution.

6.6 REPORTABLE OCCURRENCE ACTION

6.6.1 The following actions shall be taken for REPORTABLE OCCURRENCES:

- a. The Commission shall be notified and/or a report submitted pursuant to the requirements of Specification 6.9.

- (d) Total dissolved gas radioactivity (in curies) and average concentration released to the unrestricted area.
- (e) Total volume (in liters) of liquid waste released.
- (f) Total volume (in liters) of dilution water used prior to release from the restricted area.
- (g) Total gross radioactivity (in curies) by nuclide released based on representative isotopic analyses performed.
- (h) Percent of Technical Specification limit for total radioactivity.

(d) Solid Wastes

- (a) The total amount of solid waste shipped (in cubic feet).
- (b) The total estimated radioactivity (in curies) involved.
- (c) Disposition including date and destination.

6.9.6 Special reports shall be submitted to the Director of the Office of Inspection and Enforcement Regional Office within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification:

- a. Inservice Inspection Program Reviews, Specification 4.4.9.1.
- b. ECCS Actuation, Specifications 3.5.2 and 3.5.3.
- c. Inoperable Meteorological Monitoring Instrumentation, Specification 3.3.3.3.
- d. Sealed Source leakage in excess of limits, Specification 4.7.6.3.
- e. Radioactive Solid Waste Disposal, Specification 3.7.7.1.
- f. Steam Generator ISI Results, Specification 4.4.10.5.
- g. Environmental Program Violation, Specification 3.7.8.
- h. Fire Protection and Suppression System Malfunction, Specifications 3.3.3.4, 3.7.10.1, 3.7.10.2, 3.7.10.3.

6.14 FIRE PROTECTION INSPECTION

- a. An independent fire protection and loss prevention inspection and audit shall be performed annually utilizing either qualified off-site licensee personnel or an outside fire protection firm.
- b. An inspection and audit by an outside qualified fire consultant shall be performed at intervals no greater than 3 years.

30-29

NRC DISTRIBUTION FOR PART 50 DOCKET MATERIAL

FILE NUMBER

TO:
NRCFROM:
Yankee Atomic Electric Co.
Westborough, Mass
W. P. JohnsonDATE OF DOCUMENT
7/18/77DATE RECEIVED
7/21/77☒ LETTER
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ACKNOWLEDGED

PLANT NAME: Yankee Rowe Nuclear Power Plant
RBT 7/21/77Enclosed propped change to the Tech
Specs for fire protection to be consis-
tant with the revised model Standard
Technical Specifications.
2p+23p

(40 cys rec'd)

SAFETY

FOR ACTION/INFORMATION

ENVIRONMENTAL

ASSIGNED AD:

BRANCH CHIEF:

PROJECT MANAGER:

LICENSING ASSISTANT:

ASSIGNED AD:

BRANCH CHIEF:

PROJECT MANAGER:

LICENSING ASSISTANT:

V. MOORE (LTR)

B. HARLESS

INTERNAL DISTRIBUTION

REG FILES

SYSTEMS SAFETY

PLANT SYSTEMS

SITE SAFETY &

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ENVIRON ANALYSIS

FIELD

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