August 26, 1992 🗁

Docket No. 50-336

Mr. John F. Opeka Executive Vice President, Nuclear Connecticut Yankee Atomic Power Company Northeast Nuclear Energy Company Post Office Box 270 Hartford, Connecticut 06141-0270 Distribution: Docket File Wanda Jones NRC & Local PDRs CGrimes PD I-4 Plant **DNotley** SVarga ACRS (10) OPA JCalvo OC/LFMB SNorris **GV**issing LTDoerflein OGC DHagan GHi11 (4)

Dear Mr. Opeka:

SUBJECT: ISSUANCE OF AMENDMENT (TAC NO. M80021)

The Commission has issued the enclosed Amendment No. 162 to Facility Operating License No. DPR-65 for Millstone Nuclear Power Station, Unit No. 2, in response to your application dated March 18, 1991, as supplemented by letter dated December 23, 1991.

The amendment incorporates into the Technical Specifications additional fire detection and suppression systems resulting from various 10 CFR 50, Appendix R, modifications, design changes, and other changes, including changes to correct errors in the Technical Specifications and to provide consistency with those changes made in response to Generic Letter 87-09 and Amendment No. 151, as described in your submittal.

A copy of the related Safety Evaluation is also enclosed. The notice of issuance will be included in the Commission's biweekly <u>Federal Register</u> notice.

Sincerely,

Original signed by

Guy S. Vissing, Senior Project Manager Project Directorate I-4 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 162to DPR-65

2. Safety Evaluation

cc w/enclosures: See next page OFFICE OGC D:PDI-4 LA:PDI-4 PM:PDI-4 Hom NAME SNorris GSV JStolz ng:cn DATE 8 1/4/92 8 8/17/92 121/92 ////92 OFFICIAL RECORD COPY Document Name: MI280021.AMD

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Mr. John F. Opeka Northeast Nuclear Energy Company

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Gerald Garfield, Esquire Day, Berry and Howard Counselors at Law City Place Hartford, Connecticut 06103-3499

W. D. Romberg, Vice President Nuclear, Operations Services Northeast Utilities Service Company Post Office Box 270 Hartford, Connecticut 06141-0270

Kevin McCarthy, Director Radiation Control Unit Department of Environmental Protection State Office Building Hartford, Connecticut 06106

Bradford S. Chase, Under Secretary Energy Division Office of Policy and Management 80 Washington Street Hartford, Connecticut 06106

S. E. Scace, Nuclear Station Director Millstone Nuclear Power Station Northeast Nuclear Energy Company Post Office Box 128 Waterford, Connecticut 06385

J. S. Keenan, Nuclear Unit Director Millstone Unit No. 2 Northeast Nuclear Energy Company Post Office Box 128 Waterford, Connecticut 06385

Nicholas S. Reynolds Winston & Strawn 1400 L Street, NW Washington, DC 20005-3502

### Millstone Nuclear Power Station Unit 2

R. M. Kacich, Director Nuclear Licensing Northeast Utilities Service Company Post Office Box 270 Hartford, Connecticut 06141-0270

D. O. Nordquist Director of Quality Services Northeast Utilities Service Company Post Office Box 270 Hartford, Connecticut 06141-0270

Regional Administrator Region I U.S. Nuclear Regulatory Commission 475 Allendale Road King of Prussia, Pennsylvania 19406

First Selectmen Town of Waterford Hall of Records 200 Boston Post Road Waterford, Connecticut 06385

W. J. Raymond, Resident Inspector Millstone Nuclear Power Station c/o U.S. Nuclear Regulatory Commission Post Office Box 376 Waterford, Connecticut 06385-0376

Charles Brinkman, Manager Washington Nuclear Operations ABB Combustion Engineering Nuclear Power 12300 Twinbrook Pkwy, Suite 330 Rockville, Maryland 20852



UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555

## NORTHEAST NUCLEAR ENERGY COMPANY

## THE CONNECTICUT LIGHT AND POWER COMPANY

## THE WESTERN MASSACHUSETTS ELECTRIC COMPANY

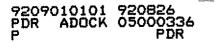
## DOCKET NO. 50-336

## MILLSTONE NUCLEAR POWER STATION, UNIT NO. 2

## AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 162 License No. DPR-65

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Northeast Nuclear Energy Company, et al. (the licensee), dated March 18, 1991, as supplemented by letter dated December 23, 1991, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.



- 2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-65 is hereby amended to read as follows:
  - (2) <u>Technical Specifications</u>

The Technical Specifications contained in Appendix A, as revised through Amendment No.162, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of issuance, to be implemented within 30 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

John F. Stolz, Director Project Directorate I-4 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: August 26, 1992

## ATTACHMENT TO LICENSE AMENDMENT NO. 162

## FACILITY OPERATING LICENSE NO. DPR-65

#### DOCKET NO. 50-336

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. The revised pages are identified by amendment number and contain vertical lines indicating the areas of change.

<u>Remove</u>	<u>Insert</u>
VIII	VIII
3/4 3-44	3/4 3-44
3/4 3-45	3/4 3-45
•	3/4 3-45a
3/4 7-37	3/4 7-37
3/4 7-40	3/4 7-40
3/4 7-41	3/4 7-41
3/4 7-42	3/4 7-42
	3/4 7-43
	3/4 7-44
6-19(b)	6-19(b)

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## LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

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# TABLE 3.3-10

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# FIRE DETECTION INSTRUMENTS

		Heat		Smoke	
Ins	trument Location (Zone)	Total No. <u>of Channels</u>	Minimum Channels <u>Operable</u>	Total No. <u>of Channels</u>	Minimum Channels <u>Operable</u>
1.	Containment				
	East Penetration (37)FLP 3-3 West Penetration (31)FLP 3-7			7 7	5 5
2.	Control Room Vent Duct (42) Z-2 Control Room Vent Duct (2) Z-1			1 1	1 1
3.	Cable Vaults & Areas				
4.	Aux. Bldg Cable Vault (25') (10) Turbine Bldg. Cable Vault (25') (22) Turbine Bldg Cable Vault Area (45') (21) Lunch Room Cable Chase Area (36'6") (24) 4.16 & 6.9 kV Switchgear Room (54'6") (40) 4.16 kV Switchgear Room (31'6") (18)	5   	4    	16 34 8 4 4	12 34 6 3 3
	480 V West Switchgear Room (36'6") (18) 480 V East Switchgear Room (36'6") (28) East DC Equipment Room (43 Alarm) (FLP-5) West DC Equipment Room (45 Alarm) (FLP-6) East Cable Vault Ventilation Opening (44) (FLP 7) West Cable Vault Ventilation Opening (44) (FLP 7)	   	    	2 2 6 1 1	1 6 6 1
5.	Battery Rooms				
	West Battery Room (14'6") (39) East Battery Room (14'6") (39)			1 2	1
6.	Electrical Penetration Rooms				
	East (14'6") (20) West (14'6") (17)			3 2	2 1

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# TABLE 3.3-10 (Continued)

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# FIRE DETECTION INSTRUMENTS

	-	Heat		Smoke		
Inst	rument Location (Zone)	Total No. of Channels	Minimum Channels <u>Operable</u>	Total No. <u>of Channels</u>	Minimum Channels <u>Operable</u>	
7.	Diesel Generators					
	Diesel 1221 (12) Diesel 1321 (13)	8 8	8 8			
8.	Main Exhaust Equipment Room and B52 Enclosure					
	Room (El 38'6") (5)			3	3	
9.	Auxiliary Building - 45 (FLP-1)					
	General Area (48)			3	2	
	A. Safe Guards Room (48) B. Safe Guards Room (48) C. Safe Guards Room (48)		 	2 2 1	1 1 1	
10.	Auxiliary Building - 25 (FLP-2)					
	General Area - 25 (52) Charging Pump Rooms - 25 (52)			9 5	7 3	
11.	Containment Building FLP-3 (37)					
	RCP "A" - (FLP 3-1) RCP "B" - (FLP 3-2) RCP "C" - (FLP 3-5) RCP "D" - (FLP 3-6)	5 5 5 5	3 3 -3 3		  	
12.	Auxiliary Building (-5'/14'6") (FLP-4) Auxiliary Building General Area 14'6" (41) Auxiliary Building West Piping Penetration (4			9	7	
	Room -5' Auxiliary Building -5' (41)			2 13	1 10	

# TABLE\_3.3-10 (Continued)

# FIRE DETECTION INSTRUMENTS

	Heat	HeatSmoke		e
Instrument Location (Zone)	Total No. <u>of Channels</u>	Minimum Channels <u>Operable</u>	Total No. <u>of Channels</u>	Minimum Channels <u>Operable</u>
13. Hydrogen Seal Oil (31)	6	6		
14. Intake Structure (6)			10	10
15. Motor Driven Aux. Feed Pump Rm (22)		<b>~</b> -	2	2

MILLSTONE - UNIT 2

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#### SPRAY AND/OR SPRINKLER SYSTEMS

#### LIMITING CONDITION FOR OPERATION

- 3.7.9.2 The following spray and/or sprinkler systems shall be OPERABLE:
  - a. Diesel Generator Rooms
  - Ь. Diesel Generator Day Tank Rooms
  - Cable Vault (Aux. Building) C.
    - 1. Sprinkler (in tray)
    - Sprinkler (ceiling level) 2.
  - d. Cable Vault (Turbine Building)
    - 1. Automatic Wet Pipe Sprinkler System (45'0")
    - 2. Automatic Deluge System (vertical cable shaft and elevation 25'0" cable vault)
  - Hydrogen Seal Oil Unit e.
  - Turbine Building Northeast Corner f.
  - Turbine Building 31'6"/14'6" North q.
  - Turbine Building 31'6"/14'6" South h.
  - i. Lube Oil Room
  - Aux. Building (-45'6") General Area j.
  - k. Aux. Building (14'6") Truck Access
  - 1. Turbine Bearing
  - Steam Generator Feed Pumps **n**.
  - Aux. Bldg. (14'6") at MCC B-61 n.
  - Aux. Bldg. (-25'6") at Charging Pump Cubicle Aux. Bldg. (14'6") General Area 0.
  - p.

<u>APPLICABILITY</u>: Whenever equipment in the spray/sprinkler protected areas is required to be OPERABLE.

#### ACTION:

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- With one or more of the above required spray and/or sprinkler a. systems inoperable, establish a continuous fire watch with backup fire suppression equipment for the unprotected area(s) within 1 hour; restore the system to OPERABLE status within 14 days or, in lieu of any other report required by Specification 6.6.1, prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 30 days outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.
- The provisions of Specification 3.0.3 are not applicable. b.

#### SURVEILLANCE REQUIREMENT

4.7.9.2 Each of the above required spray and/or sprinkler systems shall be demonstrated OPERABLE:

MILLSTONE - UNIT 2 9005

## TABLE 3.7-2

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## FIRE HOSE STATIONS

lose Station <u>Number</u>	Bldg/Elevation	Area
201-207	Turbine/14'6"	Turbine Building
208-214	Turbine/31'6"	Turbine Building
215-221	Turbine/54'6"	Turbine Building
222	Auxiliary/-45'6"	Center of Open Area
223	Auxiliary/-25'6"	Near Elevator
224	Auxiliary/-5'0"	Near Elevator
225	Auxiliary/14'6"	Near Elevator
226	Auxiliary/38'6"	Spent Fuel Pool – Northwest corner
227	Auxiliary/14′6"	Boric Acid Batch Tank area
228	Auxiliary/14'6"	Near MCC 22-1E (B51)
229	Auxiliary/14'6"	Railway access
230	Auxiliary/38'6"	Spent Fuel Pool - South Wa
231	Auxiliary/14'6"	Outside Diesel Room
234	Auxiliary/38'6"	Southeast corner stairway
240	Auxiliary/5'0"	Southeast corner stairway
241	Auxiliary/25'6"	Cable Vault Southeast Entrance
242	Auxiliary/36'6"	Control Room Ventilation Area
243	Turbine/45'0"	North Entrance of Turbine Bldg. Cable Vaults
50-251	Containment/38'6"	East & West Stairwells
48-249	Containment/14'6"	East & West Stairwells
44-245	Containment/-22'0"	East & West Stairwells
ILLSTONE - UNTI 2	3/4 7-40	Amendment No. 35. 43. 110.

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**3/4 7-40** Amendment No. **35**, **43**, **110**, 162

#### HALON FIRE SUPPRESSION SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.9.4 The following halon 1301 fire suppression systems shall be OPERABLE with: an intact gas boundary, an operable activation system, and a container having a net weight of not less than 95% of full charge weight at 325 psig minimum (corrected to  $70^{\circ}$ F).

- a) West D.C. Switchgear Room
- b) East D.C. Switchgear Room

APPLICABILITY: At all times.

#### ACTION:

- a. With one or more of the above systems inoperable, establish a continuous fire watch with backup fire suppression equipment for the unprotected area(s) within 1 hour; restore the system to OPERABLE status within 14 days or, in lieu of any other report required by Specification 6.6.1, prepare and submit a Special Report to the Commission, pursuant to Specification 6.9.2, within the next 30 days outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.
- b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.9.4 Each of the above halon fire suppression systems shall be demonstrated OPERABLE:

- a. At least once per 6 months:
  - 1. By performing a system functional test which includes simulated automatic operation of the system; and:
    - a. simulated manual actuation of the system.
    - b. verifying that the storage containers have a net weight of not less than 95% of full charge weight at 325 psig (corrected to 70°F).
    - c. verifying the associated room dampers close.
- b. At least once per 18 months:
  - 1. By performing a visual inspection of the discharge nozzles to assure no blockage.
  - 2. By performing a visual inspection to assure the gas boundary is intact.

#### 3/4.7.10 PENETRATION FIRE BARRIERS

LIMITING CONDITIONS FOR OPERATION

3.7.10 All fire rated assemblies (walls, floor/ceilings, cable tray enclosures, and other fire barriers) separating safety-related fire areas or separating portions of redundant systems important to safe shutdown within a fire area and all sealing devices in fire rated assembly penetrations (fire doors, fire windows, fire dampers, cable, piping, and ventilation duct penetration seals) shall be OPERABLE.

<u>APPLICABILITY</u>: At all times unless otherwise determined that the separation of safety-related fire areas or separating portions of redundant systems important to safe shutdown within a fire area is not required based on the MODE of operation.

#### ACTION:

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- a. With one or more of the above required fire rated assemblies and/or penetration sealing devices inoperable, within 1 hour:
  - 1. Determine that the fire areas/zones on both sides of the affected fire rated assembly and/or penetration sealing device are monitored by either an OPERABLE fire detection or automatic suppression system at the fire barrier and establish a fire watch patrol that inspects both areas at least once per hour, or
  - 2. Establish a continuous fire watch on at least one side of the affected fire rated assembly and/or penetration seal, or
  - 3. Temporarily repair the inoperable fire rated assembly and/or sealing device and classify it as temporary.

All temporary or inoperable fire rated assemblies and/or sealing devices shall be permanently repaired within 30 days, or implement ACTION 1 or 2 above.

b. The provisions of Specification 3.0.3 are not applicable.

#### SURVEILLANCE REQUIREMENTS

4.7.10 The above required fire rated assemblies and penetration sealing devices shall be verified to be OPERABLE by a visual inspection:

a. At least once per 18 months for fire doors and fire dampers.

#### Amendment No. 35, 110, 151, 162

- b. At least once per 18 months for fire barrier penetration seals, on at least 10% of the total number of penetration seals. If any of the penetration seals in the inspection sample are found to be inoperable, then an additional 10% sample of the total number of penetration seals shall be visually inspected. Sampling and inspection shall continue until all of the seals in a sample are found OPERABLE or 100% of the seals are inspected.
- c. Prior to returning a fire rated assembly and/or penetration sealing device to OPERABLE status following repairs or maintenance.

3/4.7-11 ULTIMATE HEAT SINK

LIMITING CONDITION FOR OPERATION

3.7.11 The ultimate heat sink shall be OPERABLE with an average water temperature of less than or equal to 75°F at the Unit 2 intake structure.

APPLICABILITY: MODES 1, 2, 3, AND 4

ACTION:

With the requirements of the above specification not satisfied, be in at least HOT STANDBY within 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

- 4.7.11 The ultimate heat sink shall be determined OPERABLE:
  - a. At least once per 24 hours by verifying the average water temperature at the Unit 2 intake structure to be within limits.
  - b. At least once per 6 hours by verifying the average water temperature at the Unit 2 intake structure to be within limits when the average water temperature exceeds 70°F.

## ADMINISTRATIVE CONTROLS

- c. Safety Class 1 Inservice Inspection Program Review, Specification 4.4.10.1.
- d. ECCS Actuation, Specifications 3.5.2 and 3.5.3.
- e. Fire Detection Instrumentation, Specification 3.3.3.7.
- f. Fire Suppression Systems, Specifications 3.7.9.1, 3.7.9.2 and 3.7.9.4.
- g. RCS Overpressure Mitigation, Specification 3.4.9.3.
- h. Radiological Effluent Reports required by Specifications 3.11.1.2, 3.11.2.2, 3.11.2.3 and 3.11.4.
- i. Degradation of containment structure, Specification 4.6.1.6.4.
- j. Steam Generator Tube Inspection, Specification 4.4.5.1.5.
- k. Accident Monitoring Instrumentation, Specification 3.3.3.8.
- 1. Radiation Monitoring Instrumentation, Specification 3.3.3.1.
- m. Reactor Coolant System Vents, Specification 3.4.11.



#### UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555

## SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

## RELATED TO AMENDMENT NO. 162

### TO FACILITY OPERATING LICENSE NO. DPR-65

## NORTHEAST NUCLEAR ENERGY COMPANY THE CONNECTICUT LIGHT AND POWER COMPANY THE WESTERN MASSACHUSETTS ELECTRIC COMPANY

#### MILLSTONE NUCLEAR POWER STATION, UNIT NO. 2

DOCKET NO. 50-336

## 1.0 INTRODUCTION

By letter dated March 18, 1991, supplemented by letter dated December 23, 1991, the Northeast Nuclear Energy Company (the licensee), submitted a request for an amendment to the Millstone Nuclear Power Station, Unit No. 2 Technical Specifications (TS). The requested amendment would incorporate into the Technical Specifications additional fire detection and suppression systems resulting from various 10 CFR 50, Appendix R, modifications, design changes, and other changes, including proposed changes to correct errors in the current TS and provide consistency with those changes made in response to Generic Letter 87-09 and Amendment No. 151, as described in the licensee's submittal. The December 23, 1991, letter provided information that did not change the initial proposed no significant hazards consideration determination.

#### 2.0 EVALUATION

The staff's contractor, Science Application International Corporation (SAIC), reviewed the licensee's proposal. Enclosure 1 is the Technical Evaluation Report (TER) from SAIC. The staff has reviewed the TER and agrees with the SAIC conclusions. On the basis of its review of this matter, the staff finds that the proposed changes to the TS for Millstone Unit No. 2 are acceptable.

#### 3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Connecticut State official was notified of the proposed issuance of the amendment. The State official had no comments.

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#### 4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (56 FR 20041). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

#### 5.0 CONCLUSION

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The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Enclosure: Science Applications International Corporation Technical Evaluation Report - EVALUATION OF FIRE PROTECTION TECHNICAL SPECIFICATION CHANGE, MILLSTONE UNIT 2

Principal Contributor: D. Notley

Date: August 26, 1992

## EVALUATION OF FIRE PROTECTION TECHNICAL SPECIFICATION CHANGE MILLSTONE UNIT 2 (TAC NO. M80021)

## 1.0 INTRODUCTION

By letter dated March 18, 1991 Northeast Utilities, the Licensee for Millstone Nuclear Plant Unit 2, proposed to change the plant technical specifications to incorporate additional fire detection and suppression systems resulting from various 10CFR50, Appendix R modifications, and other design changes. This change is intended to bring their technical specifications into agreement with equipment installed in the plant.

#### 2.0 DISCUSSION

In their March 18, 1991 letter, the licensee requested changes to the Millstone Unit 2 Technical Specification as follows:

- 1. Revised the Index to include the addition of a new halon fire suppression system under Section 3/4.7.9 and change subsequent page numbers as a result of the new section.
- 2. Table 3.3-10.
  - a. Added a fire zone designation for the East Penetration line item and corrected the fire zone number for the West Penetration line item.
  - b. Revised the zone location for the Turbine Building Cable Vault and the total number of channels and the minimum number of channels operable.
  - c. Corrected the zone location for the lunchroom.
  - d. A correction was made to designate one of the D.C. Equipment Rooms as the "East" room. Revised the zone location for the East and West D.C. Equipment Rooms and increased the total number of channels and the minimum number of channels operable.
  - e. Added two new areas, the East and West Cable Vault Ventilation Openings.
  - f. Revised the zone locations for both diesel locations. In addition the number of smoke detectors was revised and heat detectors were added.

- g. The B52 Enclosure was added to the list and the total number of channels and minimum number of channels operable were revised.
- h. A third Safeguards Room has been added and the total number of channels for the "B" Safeguards Room was revised.
- i. The fire zone designations for each RCP listed area was added.
- j. The total number of detectors for elevation (-5) of the Auxiliary Building was revised to reflect the as-built conditions of the plant.
- k. Added three instrument systems to Table 3.3-10, Hydrogen Seal Oil, Intake Structure, and Motor Driven Auxiliary Feed Pump Room.
- 3. Specification 3.7.9.2
  - a. Under Section 3.7.9.2.c, the type of suppression systems at different levels was revised for clarification purposes.
  - b. Under Section 3.7.9.2.d, each suppression system has been listed separately.
  - c. Three new suppression systems in the Auxiliary Building have been listed as items n, o, and p under Section 3.7.9.2.
- 4. Table 3.7-2
  - a. The hose station numbers at various locations were revised to reflect the new station numbering system.
- 5. Specification 3.7.9.4
  - a. This section was added to incorporate the installation of a halon suppression system into the East and West D.C. Switchgear Rooms.
- 6. Specifications 3.7.10 and 3.7.11
  - a. The page numbers of these sections were revised to reflect the addition of Section 3.7.9.4.
- 7. Specification 6.9.2.f
  - a. This section was revised to include the new halon suppression system specification.

## 8. Additional Changes

a. The reference to Specification 3.0.4 in Specifications 3.7.9.2 and 3.7.10 was deleted due to the recent approval of Amendment No. 151 by the NRC Staff. This submittal maintains consistency with the approval of License Amendment No. 151 by not including a reference to Specification 3.0.4 in new Specification 3.7.9.4.

By letter dated November 14, 1991, the NRC requested additional information from the Licensee for clarification of Table 3.3-10 of their Technical Specification. The Licensee responded by letter dated December 23, 1991.

## 3.0 EVALUATION

A review of the Licensee's submittal dated March 18, 1991 and their response to additional information requested dated December 23, 1991 indicates that the Licensee's proposed changes have been initiated to incorporate fire protection modifications to the plant and correct errors in the current specifications. These modifications include additional fire detection and suppression systems resulting from various Appendix R modifications, design changes, and other changes consistent with fire protection guidelines and requirements to bring the Technical Specification into agreement with actual in-plant conditions. The disagreement between the existing plant and the Technical Specifications was previously identified to the Staff in License Event Report (LER) 90-001-00 dated February 9, 1990. In addition, the reference to Specification 3.0.4 in new Specification 3.7.9.4 has been omitted to maintain consistency with License Amendment No. 151 which was approved by the Staff by letter dated February 26, 1991.

The Licensee has reviewed these changes with respect to any potential impact on design basis accidents. Operation of either sprinkler or halon suppression systems is not assumed as an initiating event or as a result of a design basis accident. In addition, the new detection and suppression systems reduce the likelihood of a failure of a safety system due to a fire and have no impact on design basis accidents. The remaining changes are clarifications or editorial changes that do not effect the operability or coverage of the detection or suppression systems to perform their design functions. The proposed changes constitute an additional limitation, restriction, or control not presently included in the Technical Specifications. The additional fire detectors increase the numbers of detection instruments required to be operable and the increase in suppression capability adds systems not previously included in the Technical Specifications. These detection and suppression system changes increase the level of fire protection at the plant. Other changes identified in this request are administrative and editorial in nature and do not increase the probability of a previously identified event.

Several concerns did arise during the review of the proposed technical specification change. Specification 3.7.9.4, Halon Fire Suppression System, was added to incorporate the

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installation of a halon system into the East and West D.C. Switchgear Rooms. In order for the halon system to function properly, an actuation signal from a detection system is required. Table 3.3-10 delineates fire detection instruments available and the minimum number required to be operable for areas covered by the technical specification. It was not clear from the room names used in Item 4 of Table 3.3-10 that the detectors for this new halon system were incorporated into Table 3.3-10. The Licensee responded that the East and West D.C. Equipment Rooms, listed under Table 3.3-10 item 4, are the East and West D.C. Switchgear Rooms, respectively. The total and minimum numbers of channels operable, for both areas as listed on Table 3.3-10, are 6 and 6 respectively. In addition, it was not clear if the detection system was the cross-zoned type and what the surveillance requirements were. The Licensee also responded that the detection system is cross-zoned and that the surveillance requirements are provided in Technical Specification 3.3.3.7, Fire Detection Instrumentation. As a result of the licensee's response, all concerns were resolved.

## 4.0 <u>CONCLUSION</u>

Based on the above evaluation, it is concluded that the proposed changes to the fire protection Technical Specifications identified in the Licensee's submittal of March 18, 1991 and their submittal of additional information on December 23, 1991 are acceptable.