ATTACHMENT I TO IPN-93-011

PROPOSED TECHNICAL SPECIFICATION CHANGES

RELATED TO

SURVEILLANCE REQUIREMENTS FOR FIRE PROTECTION
AND DETECTION SYSTEMS

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

4.12 FIRE PROTECTION AND DETECTION SYSTEMS

Applicability

This specification applies to the surveillance requirements of fire protection and detection systems provided for protection of safe shutdown systems.

Objective

To verify the operability of fire protection and detection systems.

Specification

A. High Pressure Water Fire Protection System Testing:

1. Testing Requirements:

	Item	Frequency
a.	Fire Water Storage Tanks Minimum Water Volume.	once/week
b.	Main Fire Pump Operability - Each pump operating for at least 15 minutes.	once/month
c.	Valve Position Check - Verification that each valve (manual, power operated or automatic) in the flow path necessary for proper functioning of any portion of this system required for protection of safe shutdown systems is in its correct position. If the valve has an installed monitoring system, the valve position can be checked via that monitoring system.	once/month
d.	Valve Cycling Test - Exercise each valve necessary for proper functioning of any portion of this system required for protection of safe shut-down systems through at least one complete cycle.	
	(i) Valves testable with plant on-line.	once/12 months
	(ii) Valves not testable with plant on-line.	once/24 months

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e.	System Functional Test – Verification of proper actuation of this system throughout its operating sequence, and (i) Verification that each automatic valve in the flow path actuates to its correct position, and (ii) Verification that each fire suppression pump starts (sequentially) to maintain fire water suppression system pressure.	once/24 months
f.	Main Fire Pump Capacity and System Flow Check – Verification that each pump develops a flow of 2350 gpm at a system head of 250 feet.	once/24 months
g.	System Flow Test – Performance of a flow test in accordance with Chapter 5, Section 11 of the Fire Protection Handbook, 14th Edition, published by the National Fire Protection Association for any portion of this system required for protection of safe shutdown systems.	once/3 years
h.	System Flush – (may be done concurrent with System Flow Test).	once/3 years

2. Fire Pump Diesel Engine Testing Requirements:

	Item	Frequency
a.	Verify that the Fuel Oil Storage Tank contains at least 120 gal. of fuel.	once/month
b.	Test diesel fuel sample to verify conformance with diesel manufacturer's recommended minimum requirements for viscosity, water, and sediment.	once/3 months

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c.	Verify diesel starts from ambient conditions and operates for at least 30 minutes (may be done concurrent with 15 minute diesel pump test).	once/month
d.	Conduct a thorough inspection of the diesel in accordance with procedures prepared in conjunction with the manufacturer's recommendations.	once/18 months
e.	Verify that the diesel starts from ambient conditions on the auto-start signal and is operated for greater than or equal to 30 minutes while loaded with the fire pump.	once/24 months

3. Fire Pump Diesel Starting 24-Volt Battery Bank and Charger Requirements:

	Item	Frequency
a.	Verify electrolyte level of each battery is above the plates and that the overall battery voltage is greater than or equal to 24 volts. Also verify that the specific gravity is appropriate for continued service of the battery.	once/month
b.	Verify that the batteries and battery racks show no visual indication of physical damage or abnormal deterioration and that the battery terminal connections are clean, tight, and free of corrosion.	once/18 months

B. Electrical Tunnel, Diesel Generator Building and Containment Fan Cooler Fire Protection Spray and/or Sprinkler System Testing:

1. Testing Requirements:

	Item	Frequency
a.	Verify that each valve	once/month

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(manual, power operated or automatic) in the flow path and which is accessible is in the correct position.

b. Valve Cycling Test -
Exercise each valve necessary for proper functioning of any portion of this system required for protection of safe shutdown systems through at least one complete cycle:

(i)	Valves testable with plant on-line.	once/12 months
(ii)	Valves not testable with plant on-line.	once/24 months

c. System Functional Test -
Includes simulated automatic actuation of spray system and verification that automatic valves in the flow path actuate to their correct position.

(i)	Electrical Tunnel and Diesel Generator Building.	once/18 months
(ii)	Containment Fan Cooler Spray.	once/24 months

d. Spray Header Visual Inspection -
To verify integrity.

(i)	Electrical Tunnel and Diesel Generator Building.	once/18 months
(ii)	Containment Fan Cooler Spray.	once/24 months

e. Visual Inspection of Each Spray Nozzle -
To verify that each nozzle spray area is unobstructed.

(i)	Electrical Tunnel and Diesel Generator Building.	once/18 months
(ii)	Containment Fan Cooler Spray.	once/24 months

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f.	Air Flow Test – Perform air flow test through each open spray/sprinkler header and verify each open spray/sprinkler nozzle is unobstructed.	once/3 years

2. The requirements of 4.12.B.1 shall not apply to self-actuated type spray nozzles which are capable of only one actuation and cannot be periodically cycled or tested. These self-actuated spray nozzles shall be visually inspected at least once per 18 months to verify that no nozzle damage exists and that the nozzles are unobstructed.

C. Penetration Fire Barrier Inspection:

1. The penetration fire barriers listed in specification 3.14.C.1 shall be verified to be functional by visual inspection:

   a. At least once per 24 months.

   b. Prior to declaring a fire penetration barrier functional following repairs or maintenance.

D. Fire Detection Systems Testing:

1. The operability of the fire detection instruments utilized in satisfying the requirements of specification 3.14.D.1 including the actuation of appropriate alarms (Channel Functional Test) shall be verified as follows:

	Item	Frequency
a.	Smoke Detectors–	once/6 months
b.	Heat Detectors –	
(i)	Those associated with the Diesel Generator Building (item 5 in Table 3.14-1).	once/6 months
(ii)	Those associated with the Electrical Tunnels (item 3 in Table 3.14-1).	once/12 months
(iii)	Those associated with the Containment Fan Cooler Units (item 6 in Table 3.14-1).	once/24 months
c.	Flame Detectors	once/6 months

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E. Fire Hose Stations Testing:

1. Fire hose stations described in specification 3.14.E.1 shall be demonstrated operable by the following surveillance testing requirements:

	Item	Frequency
a.	Visual Inspection Test – Visual inspection of the hose stations to assure all required equipment is at the station.	once/month
b.	Hose Removal Check – Removal of the hose for inspection and replacement of all degraded gaskets in couplings.	once/24 months
c.	Hose Flow Test – Partial opening of each hose station valve to verify valve operability and no flow blockage.	once/3 years
d.	Hose Hydrostatic Test – Conduct a hose hydrostatic test at a pressure at least 50 psig greater than the maximum pressure available at that hose station.	once/3 years

F. Yard Hydrants and Hydrant Hose House Inspection:

1.	Visually inspect those hose houses associated with hydrants listed under Table 3.14-3 in order to assure that all required equipment is inside.	once/month
2.	Visually inspect those hydrants listed under Table 3.14-3 to verify that the hydrant barrel is dry and undamaged.	once/6 months (Spring/Fall)
3.	For those hydrants serving safety related areas, specifically Hydrants #31, 32, 35, 36, 38, 39 and 310, flow check each hydrant to demonstrate its operability.	once/year
4.	Conduct a hose hydrostatic test at a pressure at least 50 psi greater than the maximum pressure available at any yard hydrant. Also, inspect all gaskets and replace any degraded gaskets in the couplings.	once/year

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G. CO_2 Fire Protection System

1. Those portions of the CO_2 System required to be operable by specification 3.14.G.1 and 3.14.G.2 shall be demonstrated operable by the following surveillance requirements.

	Item	Frequency
a.	Verify Level and Pressure Indication for CO_2 Supply Units 3-1 or 3-2 for that unit which is lined up to the Control and Diesel Generator Buildings.	once/week
b.	Verify that each valve (manual, power operated or automatic) in the flow path is in its correct position.	once/month
c.	System Functional Test: Verify that system valves and associated ventilation dampers and fire door release mechanisms actuate upon receipt of a simulated actuation signal.	once/24 months
	Exercise fire dampers.	once/12 months
d.	Verify flow from nozzles during a "Puff Test."	once/24 months

Basis

These specifications establish the surveillance program for Fire Protection and Detection Systems provided to protect equipment utilized for safe shutdown of the unit. This surveillance program is intended to verify the operability of these systems and will identify for corrective action any conditions which could prevent any portion of the systems performing its intended function.

The Fire Protection and Detection Systems installed at IP3 conform to Appendix A to Branch Technical Position (BTP) APCSB 9.5-1 "Fire Protection for Nuclear Power Plants," as approved by the NRC Regulatory Staff on March 6, 1979, Amendment No. 24 to facility operating license No. DPR-64, and supplements thereto.

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ATTACHMENT II TO IPN-93-011

SAFETY EVALUATION

RELATED TO

SURVEILLANCE REQUIREMENTS FOR FIRE PROTECTION

AND DETECTION SYSTEMS

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

Section I-Description of Changes

This application for amendment to the Indian Point 3 (IP3) Technical Specifications proposes to change the surveillance requirements for Fire Protection and Detection Systems to accommodate operation with a 24 month operating cycle.

Starting with cycle nine (August,1992), Indian Point 3 began operating on a 24 month operating cycle instead of the previous 18 month operating cycle. The specific Fire Protection and Detection Systems Technical Specifications affected by the change to a 24 month operating cycle and applicable portions of which are changed by this application are:

- High Pressure Water Fire Protection System tests.
- Fire Pump Diesel Engine test.
- Electrical Tunnel; Diesel Generator Building and Containment Fan Cooler Fire Protection Spray and/or Sprinkler System tests.
- Fire Detection System tests.
- Fire Hose Station tests.
- CO_2 Fire Protection System tests.
- Fire Barrier Penetration Seal Inspection.

The affected section of the Technical Specifications has been repaginated and also includes administrative changes.

Section II-Evaluation of Changes

Starting with cycle nine (August, 1992), Indian Point 3 began operating on a 24 month operating cycle instead of the previous 18 month operating cycle. To avoid either a separate surveillance outage or an extended mid-cycle outage, extension of the surveillance test intervals for the Fire Protection and Detection Systems is required. The decision to extend surveillance test intervals to be consistent with the length of the operating cycle considers the function of the test in determining the overall system operability, the integrated effect of testing and maintenance activities on system operability and the burden of performing surveillance at power. These considerations are applied to the evaluation of Indian Point 3 Fire Protection and Detection Systems surveillance tests. It included a study of specific surveillance histories, operational occurrences and maintenance programs to determine if equipment operability problems are being identified in a timely fashion. Surveillance data from the past six years (1986 to mid-1992), if applicable, was analyzed for each test affected by the extended

surveillance interval. Operational Occurrence Reports involving system components were also analyzed for the last six years (1986 to mid-1992). Below is an evaluation for each technical specification this application proposes to change.

Fan Cooler Unit Heat Detectors

The purpose of this test is to verify the ability of the containment fan cooler unit (FCU) heat detectors to detect a fire starting in the charcoal filters of the units. The test consists of applying heat to each of the 6 heat detectors on the 5 fan cooler units (for a total of 30 heat detectors) and verifying that the corresponding control room alarm annunciates.

The first consideration for extension of the heat detector surveillance with the longer operating cycle is the past performance of the equipment. Test results from the past five refueling outages (1986 to 1992) showed that operability criterion was consistently met for each of the tests (i.e., 4 out of 6 heat detectors functional for each fan cooler unit). Also, only six as-found heat detector failures out of a possible 150 were noted. The results do not indicate any time dependence; there was no correlation between the length of the surveillance interval and heat detector failure rate. Also, a review of the work history for the heat detectors found no other problems related to the fan cooler unit heat detectors other than the deficiencies found during the refueling surveillance.

The heat detectors are redundant; for each FCU, four out of the six are required by IP3 Technical Specifications. Each detector has its own separate alarm to the control room; corrective action would be manually initiated based on these alarms.

The final consideration in extension of fan cooler unit heat detector functional testing is the burden of performing the surveillance at power. This test should only be performed when there is access to the containment. Radiation exposure to plant personnel performing the test is minimized in accordance with the IP3 ALARA program.

The Fan Cooler Unit Heat Detectors functional test may be safely extended with the longer operating cycle for the following reasons: 1) operability criterion was consistently met; a review of the test results for the last five refueling outages revealed a failure rate of only 4% for the heat detectors, 2) there was no correlation between the length of the surveillance interval and heat detector degradation; therefore, accelerated degradation of the detectors over the longer cycle length is not expected, 3) a review of the occurrence reports and the work history found no discrepancies related to the heat detectors other than the infrequent problems found during testing, 4) the detectors are redundant with separate alarms to the control room; corrective action would be manually initiated based on these alarms, and 5) the test should only be performed when there is access to the containment.

Fire Pumps Functional Test

The fire protection system utilizes four pumps to deliver water to the fire loop. For diversity, motor-driven and diesel-driven main fire pumps are used. Two jockey pumps are used in

maintaining header pressure, which minimizes the starting of the two main fire pumps. The electrical supply to the motor-driven fire pump comes from redundant sources through a transfer switch. The two main fire pumps and associated support components necessary for operation are governed by the Technical Specifications.

The first consideration in extension of this surveillance test is the existence of on-line testing which effectively determines the operability of the fire pumps. The Fire Pump Functional Test is performed on a monthly basis. The procedure checks the manual and automatic initiation (manual, even months - automatic, odd months) of both the electric and diesel fire pumps. Flow is verified at 2350 gpm and 2500 gpm (100% of rated flow) for each of the pumps whether it be started manually or automatically. Diesel engine operability, electric and diesel pump vibration readings, and a diesel fuel storage tank inspection are also performed. The difference between the monthly pump test and the refuel test is that the refuel test checks the capability of a single pump to deliver 150% of the system design flow. Pump degradation or control system failures would be adequately detected during the monthly tests. The jockey pumps are not tested on-line during the monthly surveillance. The extension of jockey pumps surveillance with the longer cycle is justified since they are not required to suppress a design basis fire. A review of occurrence reports for the past 6 years (1986 to mid-1992) found three occurrences related to the fire pumps. All were maintenance related; battery cleaning for the diesel, regularly scheduled diesel fire pump preventive maintenance, and repacking a valve associated with the electric fire pump. A review of surveillance test data (1986 to mid-1992) indicates that the fire pumps routinely meet the acceptance criteria.

Even though there is no burden of performing the surveillance at power, the Fire Pump Functional Test may be safely extended with the longer operating cycle for the following reasons: 1) the monthly functional test ensures operability of both the electric and diesel driven fire pumps; 2) a review of past test results and occurrence reports found no operability problems; system reliability is not expected to degrade with the longer operating cycle; and 3) system design and performance has been verified as adequate for any expected water flows as a result of a fire.

<u>High Pressure Water Fire Protection System Valve Cycling [Off Line]</u>

The purpose of this test is to verify the operability of the high pressure water fire protection system valves. The test consists of cycling the required valves through one complete cycle.

The first consideration in extending this surveillance is the burden of testing at power. The valves in this test cannot be exercised on-line without exposing plant staff to higher radiation levels than with the plant shutdown. Radiation exposure should be minimized in accordance with the IP3 ALARA program. The valves that are not accessible are all associated with the various hose stations positioned throughout the Containment Building. Hose station performance and water flows from these hose stations have not been a problem. Valves which are accessible are exercised annually with the plant on-line.

A review of the test results for the past 6 years (1986 to mid-1992) found no test failures or

other discrepancies related to the high pressure water fire protection system valve cycling, indicating reliable operation of the valves. Also, a review of the past 6 years (1986 to mid-1992) occurrence reports found no failures or concerns related to the high pressure water fire protection system valves. This confirms the reliable performance of the valves. A review of the work request database found no entries for corrective maintenance related to the inaccessible high pressure water fire protection system valves.

The High Pressure Water Fire Protection System Valve Cycling [Off Line] surveillance may be safely extended with the longer operating cycle for the following reasons: 1) the valves in this test are not normally exercised on-line since they are located inside the Containment Building. The valves that are not accessible are all associated with the various hose stations positioned throughout the building. Hose station performance and water flows from these hose stations have not been a problem; also, testing of these valves during normal operation would subject the technicians performing the test to higher radiation levels, and 2) a review of past test results, occurrence reports, and work requests found no failures related to the high pressure fire protection valves.

Charcoal Filter Dousing System Functional Test and Inspection

Manually actuated water spray systems are provided for charcoal filters servicing the five containment fan cooler units. These water spray systems are manually activated from outside the containment. Water supply for the charcoal filter dousing system is provided via the Containment Spray System.

The test consists of cycling each of the two valves associated with each of the five fan cooler units, and recording their opening and closing times. Each fan cooler unit fire protection system is then visually inspected. Finally, the valves and their corresponding motor operators are inspected.

The first consideration in extension of the system testing is the burden of performing the surveillance test at power. This test should only be performed when there is access to the containment. Radiation exposure to plant personnel performing the test is minimized in accordance with the plant's ALARA program.

Another consideration for extension of this surveillance with the longer operating cycle is the past performance of the system. The importance of this surveillance is to ensure that the valves cycle as required. A review of the past five test results (1987 to 1992) revealed only two test failures, both in the same outage. All other test results were acceptable. A review of the work requests associated with the charcoal filter dousing system found no evidence that valves in the dousing system degrade as a function of the length of the surveillance interval. Also, a review of the occurrence reports for the last six years (1986 to mid-1992) revealed no concerns associated with the charcoal filter dousing system.

The Charcoal Filter Dousing System inspection may be safely extended with the longer operating cycle for the following reasons: 1) testing should not be performed during power

operation; access to the containment is necessary, 2) a review of the past five test results revealed only two discrepancies in the 1987 surveillance, 3) a review of the work requests found no evidence that valves in the dousing system degrade as a function of the length of the surveillance interval, and 4) a review of the occurrence reports revealed no concerns associated with the charcoal filter dousing system.

Fire Hose Station Surveillance

Containment Fire Protection

The purpose of this inspection is to verify the operability of the fire hoses. The inspections of the fire hose stations outside containment may be performed regardless of plant status, while inspection of the containment fire hoses should only be performed when the containment is accessible. The surveillance consists of checking the hose stations in the Primary Auxiliary, Control, Auxiliary Feed Pump, and Fuel Storage Buildings, the Fan House, and Containment for signs of tears, fraying, and rotting, as well as checking the fittings for signs of worn gaskets. The hose and rack units are UL and FM approved, with 100 feet of one and one-half inch cotton/dacron neoprene-lined hose.

The first consideration for extension is the past inspection results for the fire hose stations. Surveillance results from the past six years (1986 to 1992) showed no discrepancies relating to the condition of the hose stations. Also, a review of the work requests revealed no problems associated with the fire hose stations. Finally, a review of the occurrence reports from 1986 to mid-1992 found no operability concerns with the hose stations.

The fire hose stations are located inside the plant. The equipment is not subject to harsh environmental conditions (e.g., rain, snow, and extreme temperature changes) which may damage the hose materials. However, heat and temperature can degrade the hoses. For this reason, plant practice is to replace the hoses more frequently than required. In addition, the equipment remains in a stored state, and is not employed during normal operation. Extension to a longer operating cycle is not expected to significantly degrade the condition of the fire hose stations. A final consideration for extension of this surveillance with the longer operating cycle is the burden of testing at power. This only applies to the inspection of the containment fire hose stations; the surveillance should only be performed when the containment is accessible to minimize occupational radiation exposure to plant personnel when performing the test in accordance with the IP3 ALARA program.

The Fire Hose Station Surveillance and the Containment Fire Protection test may be safely extended with the longer operating cycle for the following reasons: 1) a review of past performance, which included test results, work requests, and occurrence reports, found hose station conditions to be reliable (i.e., no evidence of equipment degradation), 2) the hose stations are not subject to harsh environmental conditions (e.g., rain, snow, and extreme temperature changes) which may damage the hose material, 3) there is a low likelihood of accelerated degradation with the longer cycle since the equipment remains in a

stored state during normal plant operation, and 4) the containment hose stations are not inspected during power operation.

System Functional Test of CO_2 System

The purpose of this surveillance is to demonstrate the operability of the CO_2 system valves, associated ventilation dampers, equipment shutdown and/or fire door release mechanisms to actuate upon receipt of a simulated actuation signal. This test includes the cable spreading room, 480V switchgear room, and diesel generator rooms No. 31, 32, & 33. The surveillance consists of manual and automatic (heat detector) actuation of the various CO_2 systems, verifying that the local and remote (Control Room) alarms annunciate, verifying CO_2 flow by puff test, and returning the systems to service.

The first consideration for surveillance extension is past equipment performance. The past five refueling outage test results (1987-1992) were reviewed to determine system reliability; four tests revealed damper failures (i.e., jammed dampers). Other than the damper failures, system performance was good.

Even though this surveillance can be performed at power, it may be safely extended with the longer operating cycle provided that the dampers are exercised on an annual basis. This extension is justified since past operability concerns were limited to damper performance. An annual frequency is in accordance with NFPA 12, "Carbon Dioxide Extinguishing Systems," which recommends an annual inspection of CO_2 systems (Note: IP3 system was designed and constructed to applicable sections of this Code in the early 1980s). The incorporation of an annual CO_2 damper functional test will detect damper operability concerns.

Fire Barrier Penetration Seal Inspection

Surveillance requirement 4.12.C.1 of the IP3 Technical Specifications requires a visual inspection of fire barriers in order to verify their integrity. Fire barriers and seals are required by Appendix "R" to 10 CFR 50 and Appendix A to Branch Technical Position (BTP) 9.5-1. The inspection consists of visually inspecting the fire penetrations for damage and/or conditions which would enable fire, smoke, or fire gases to pass through the seal to the adjoining fire area.

Even though there is no burden of performing the surveillance at power, one of the considerations for extension is the existence of on-line penetration inspections. On a quarterly basis, an inspection is performed on those penetrations listed in the Technical Specifications. This verifies the integrity of the penetration fire barriers between: the central control room floor and the cable spreading room, the 480V switchgear room and the cable spreading room, the diesel generator compartments from each other and the control building, the control building and the turbine building, and the cable spreading room and the electrical tunnels.

Another consideration for surveillance extension is the past inspection results. A review of the last five refueling outage (1986 to 1992) inspection results found that the continuing integrity

of the fire barrier penetration seals has been good. The inspections during the 1990 and 1992 refueling outages found a few minor violations of fire barrier integrity caused by an incomplete modification of resealing penetrations. The inspections from 1986, 1987, and 1989 refueling outages showed infrequent penetration integrity problems; i.e., 9 out of 3349 fire barrier penetrations inspected over the three refueling outages were found outside the acceptance criterion. These discrepancies were corrected. It should be noted that the refueling surveillance is used as the final closeout of any penetration modification work completed during a refueling outage. In this way, any incomplete modification work is caught by the surveillance test with rework generated for those surveillance tests that fail. It should also be noted that IP3 has approximately 1120 fire barrier penetrations that are inspected collectively under the various surveillance tests conducted each refueling outage. Of those approximately 1120 penetrations, relatively few have required rework or shown degradation when surveillance tests were performed.

Section III-No Significant Hazards Evaluation

Consistent with the criteria of 10 CFR 50.92, the enclosed application is judged to involve no significant hazards based on the following information:

(1) Does the proposed license amendment involve a significant increase in the probability or consequences of any accident previously evaluated?

Response:

Since the proposed change to extend the surveillance test intervals for High Pressure Water Fire Protection System, Fire Pump Diesel Engine, Electrical Tunnel, Diesel Generator Building and Fan Cooler Fire Protection Spray and/or Sprinkler System, Fire Detection System, Fire Hose Station, CO_2 Fire Protection System and Fire Barrier Penetration Seal inspection does not involve changes in equipment/system functions and does not adversely affect system operability, the proposed change does not involve a significant increase in the probability or consequences of any accident previously evaluated.

(2) Does the proposed license amendment create the possibility of a new or different kind of accident from any previously evaluated?

Response:

Since the proposed changes only increase the surveillance interval to be consistent with the operating cycle and do not involve changes in equipment/system functions or adversely affect system operability, the proposed changes do not create the possibility of a new or different kind of accident from any previously analyzed.

(3) Does the proposed amendment involve a significant reduction in the margin of safety?

Response:

The proposed changes only extend the surveillance interval. Evaluation of the past performance of the equipment indicates that the effects of extending the surveillance test intervals would not involve a significant reduction in the margin of safety. Therefore, the proposed changes do not involve a significant reduction in the margin of safety.

Section IV - Impact of Changes

These changes will not adversely impact the following:
ALARA Program
Security and Fire Protection Programs
Emergency Plan
FSAR and SER Conclusions
Overall Plant Operations and the Environment

Section V - Conclusions

The incorporation of this change: a) will not increase the probability nor the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the Safety Analysis Report; b) will not increase the possibility for an accident or malfunction of a different type than any evaluated previously in the Safety Analysis Report; c) will not reduce the margin of safety as defined in the bases for any technical specification; d) does not constitute an unreviewed safety question; e) involves no significant hazards considerations as defined in 10 CFR 50.92. The Authority recognizes that good effective fire protection and prevention practices may require increased surveillance over that listed in the current or proposed Technical Specifications. Where practical, the Authority may increase surveillance to ensure compliance with all applicable fire code recommendations that produce a benefit in terms of fire hazard risk reduction. Nonetheless, the Authority will, as a minimum, ensure compliance with the requirements of the proposed Technical Specifications.

Section VI - References

1) IP3 SER
2) IP3 FSAR
3) Indian Point 3 - 24 Month Operating Cycle Fire Protection Systems Surveillance And Maintenance Extensions (IP3-RPT-FP-00419).