LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT
b. The results of laboratory carbon sample analysis shall show $\geq$90% radioactive methyl iodide removal at a face velocity of 40 fpm, 0.05 to 0.15 mg/m^3 inlet iodide concentration, $\geq$ 95% R.H. and $\geq$ 125°F.	b. Cold DOP testing shall be performed after each complete or partial replacement of the HEPA filter bank or after any structural maintenance on the system housing.
c. System flow shall be 1000 cfm $\pm$ 100 cfm.	c. Halogenated hydrocarbon testing shall be performed after each complete or partial replacement of the charcoal adsorber bank or after any structural maintenance on the system housing.
	d. Each circuit shall be operated at least 10 hours every month.
3. From and after the date that one of the control room air treatment systems is made or found to be inoperable for any reason, reactor operation or refueling operations is permissible only during the succeeding seven days unless such circuit is sooner made operable.	3. At least once per operating cycle automatic initiation of the control room air treatment system shall be demonstrated.
4. If these conditions cannot be met, reactor shutdown shall be initiated and the reactor shall be in COLD SHUTDOWN within 24 hours for reactor operations and refueling operations shall be terminated immediately.	
B. REMOTE SHUTDOWN PANELS	B. REMOTE SHUTDOWN PANELS
1. At all times when not in use, being tested or being maintained, the Remote Shutdown Panel and local control panels shall be locked.	1. The Remote Shutdown Panel and local control panels shall be visually checked once per week to verify they are locked.
	2. Switches on the Remote Shutdown Panel and local control panels shall be functionally tested and instrumentation calibrated once per operating cycle.

filters and charcoal adsorbers are as specified, the resulting doses will be less than the allowable levels stated in Criterion 19 of the General Design Criteria for Nuclear Power Plants, Appendix A to 10 CFR Part 50. Operation of the fans significantly different from the design flow will change the removal efficiency of the HEPA filters and charcoal adsorbers.

If one of the systems is found to be inoperable, the second unit provides protection and reactor operation or refueling operation may continue for a limited period of time while repairs are being made. If the system cannot be repaired within seven days, the reactor is shut down and brought to COLD SHUTDOWN within 24 hours or refueling operations are terminated.

B. REMOTE SHUTDOWN PANELS

The Remote Shutdown Panel and its associated local control panels are provided to assure the capability of achieving COLD SHUTDOWN, external to the control room, in the unlikely event the control room becomes uninhabitable or safe-shutdown equipment in the control room is damaged.

current USNRC Health and Safety Bulletin for Filter Unit Inspection and Testing Service. The Filter Test Facility should test each filter at 100% and 20% of rated flow, with the filter encapsulated to disclose frame and gasket leaks.

Operation of the system for 10 hours every month will demonstrate operability of the filters and adsorber system and remove excessive moisture built up on the adsorber.

If significant painting, fire or chemical release occurs such that the HEPA filter or charcoal adsorber could become contaminated from the fumes, chemicals or foreign materials, the same tests and sample analysis shall be performed as required for operational use. The determination of significant shall be made by the operator on duty at the time of the incident. Knowledgeable staff members should be consulted prior to making this determination.

Demonstration of the automatic initiation capability is necessary to assure system performance capability.

B. REMOTE SHUTDOWN PANELS

Once per week verification that the Remote Shutdown Panel, and its associated local control panels, are properly locked is considered adequate. The associated equipment is proven operable during normal surveillance testing of that equipment from the Control Room. A functional test and calibration during each operating cycle is adequate to assure that the Remote Shutdown Panels are operable and can perform their design function.

LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT
3.13 FIRE PROTECTION SYSTEMS	4.13 FIRE PROTECTION SYSTEMS
Applicability:	Applicability:
Applies to the operational status of the Fire Protection Systems.	Applies to the surveillance requirements of the Fire Protection Systems.
Objective:	Objective:
To assure the ability of the Fire Protection Systems to protect safety related systems required for safe plant shutdown.	To verify the ability of the Fire Protection Systems to protect safety related systems required for safe plant shutdown.
Specification:	Specification:
A. Fire Detection Instrumentation	A. Fire Detection Instrumentation
1. The fire detection instrumentation for each fire detection zone shown in Table 3.13-1 shall be operable whenever safety related equipment in that fire detection zone is required to be operable.	1. Fire Detection Instrumentation testing.
	a. Each fire detection instrument listed in Table 3.13-1 shall be demonstrated operable by performance of the manufacturers recommended tests at least once per six months.
	b. The circuitry associated with the detector alarms shall be demonstrated operable at least once every two months.
2. If the number of instruments operable for any zone is less than the minimum required;	
a. Within 1 hour, establish a fire watch to inspect the zone with the inoperable instrument(s) at least once per hour, and	

LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT
B. Fire Suppression Water System	B. Fire Suppression Water System
1. The Fire Suppression Water System shall be operable with:	1. The Fire Suppression Water System shall be demonstrated operable:
a. The river water supply system operable.	a. By verifying that the river water supply system is operable per Specification 3.5.J.
b. Two (2) fire pumps operable and aligned to the fire suppression yard header.	b. At least once every week by starting the diesel-driven fire pump and operating it for at least 30 minutes.
c. Automatic initiation logic for each fire pump.	c. At least once per month by starting the motor-driven fire pump and operating it for at least 15 minutes on recirculation flow.
	d. At least once per six months by a flush of the yard header.
	e. At least annually by verifying that each pump will develop a flow of at least 3100 gpm with a discharge pressure of 108 psig.
	f. At least once per three years by verifying the hydraulic performance of the system by starting the motor-driven fire pump and directing flow around the yard header. Under this condition the flow and pressure requirements described in Specification 4.13.B.1.e shall be met.
	g. At least once per 92 days by verifying that a sample of diesel fuel from the fuel storage tank, obtained in accordance with ASTM-D270-65, is within the acceptable limits specifiied in Table 1 of ASTM-D975-74 with respect to viscosity, water content and sediment.

LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT
C. Deluge and Sprinkler Systems	C. Deluge and Sprinkler Systems
1. The deluge and sprinkler systems located in the following areas shall be operable whenever safety related equipment in the deluge/sprinkler protected area is required to be operable.	1. The deluge and sprinkler systems shall be demonstrated to be operable:
a. RCIC Room (Deluge System #1)	a. At least once per 12-month cycle:
b. HPCI Room (Deluge System #2)	1) By performing a system functional test which includes simulated automatic actuation of the system and verifying that the automatic valves in the flow path actuate to their correct positions.
c. Diesel Generator Rooms (Preaction Sprinkler Systems #2 and #3)	2) By visual inspection of sprinkler headers to verify their integrity.
d. Control Building Standby Filter Unit charcoal beds. (Deluge Systems #21 and #22)	3) By inspection of each nozzle for obstructions or damage.
e. Standby Gas Treatment System charcoal beds. (Deluge Systems #19 and #20)	b. At least once per three years by an air flow test of the deluge systems.
f. Reactor Building A/C Chiller Area 812' (Sprinkler System #11)	
g. Control Building HVAC Equipment Room (Sprinkler System #12)	
h. Reactor Building Equipment Hatch Water Curtain (Deluge System #18) (Shall be operable whenever the reactor is not in COLD SHUTDOWN)	
2. If any of the above listed deluge and sprinkler systems is found to be inoperable,	
a. Within 1 hour, establish a fire watch with portable fire extinguishing equipment to ensure that each area where protection is lost is checked hourly, and	
b. Restore the system to operable status within fourteen days.	
3. If Specification 3.13.C.2.b cannot be met, prepare and submit a Special Report to the Commission pursuant to Specification 6.11 within 30 days outlining the cause of inoperability and plans for restoring the system to operable status.	

3.13 BASES

The Fire Protection specifications are provided in order to meet the preestablished levels of operability during a fire. Requiring a patrolling fire watch with portable fire equipment if the automatic initiation is lost will provide (as does the automatic system) for early reporting and immediate fire fighting capability in the event of a fire occurrence. The Fire Protection System is supplied by two pumps aligned to the fire header.

The fire pumps take suction from the circulating water pump pit, which is supplied water from the river via the River Water Supply (RWS) pumps. The capacity of one RWS pump will meet the maximum requirement of the Fire Suppression Water System. However, the Technical Specification for the RWS System does not allow the plant to operate with less than two RWS pumps operable (Specification 3.5.J). Therefore, the limiting conditions for operation for the water supply to the Fire Suppression Water System will be dictated by the limiting conditions for operation of the River Water Supply System.

The fire pump size is based on the largest automatic system demand plus 1000 gpm for hose streams with the shortest portion of the fire loop out of service, per NEL-PIA recommendations. The fire pumps were purchased with a standard rating of 2500 gpm @ 125 psig, but have adequate capacity to meet the following worst requirement:

1.	Sprinkler System #4 (requirement of 0.20 gpm/ft^2 for any 10,000 ft^2 area)	2100 gpm
2.	Hose Streams	1000 gpm
	Total	3100 gpm

The head required at the fire pump discharge nozzle is 108 psig at 3100 gpm assuming the shortest leg of the fire loop to Sprinkler System #4 is out of service.

The CO_2 Fire Protection System is considered operable with a minimum of 9 tons (0.9 tank) CO_2 in storage. Within an hour, a continuous fire watch in the cable spreading room will be established if CO_2 fire protection is lost in this room and will continue until CO_2 fire protection is restored.

Early reporting and immediate fire fighting capability in the event of a fire occurrence will be provided (as with the automatic system) by requiring a patrolling fire watch if the number of detectors for a given protected zone is below the minimum operable required.

The HVAC pump room in fire detection zone 35 has only one detector. Should that fire detector become inoperable, a fire watch must be established until the inoperable detector is made operable.

Only hose stations and sprinkler/spray systems protecting safety related systems are required to be operable per the requirements of this Technical Specification. All other hose stations and sprinkler/spray systems are maintained per the regular plant maintenance and inspection procedures.

4.13 BASES

Periodic testing of the Fire Protection System will provide positive indication of its operability. If only one of the pumps supplying the Fire Protection System is operable, the pump that is operable will be checked immediately and daily thereafter to demonstrate operability. If the CO_2 System becomes inoperable in the cable spreading room, a continuous fire watch will be established within an hour.

Wet fire header flushing, spray header inspection for blockage, and nozzle inspection for blockage will prevent, detect, and remove buildup of sludge or other material to ensure continued operability.

Semiannual tests of heat and smoke detectors are in accordance with the NFPA code.

One detector in zones 1 or 3 (Control Room Back Panel Area) may be inoperable without making that fire detection zone inoperable due to the number of adjacent detectors in these zones providing coverage. All the fire detection equipment in zones 15 to 16 (essential switchgear rooms), zones 13, 14 and 17 (battery rooms), zones 21 and 22 (diesel-generator rooms) and zone 2 (Control Room Back Panel Area), Fire Zone 12-B (Control Building HVAC Room), and at Panel 1C-388 (Reactor Building Remote Shutdown Panel) are considered essential for adequate fire detection in these areas and are therefore all required to be operable. Up to three detectors for each zone in the cable spreading room (zones 5, 6, 7 and 8) can be inoperable without making that zone inoperable, as long as there are no adjacent detectors which are also inoperable. Adjacent detectors will provide coverage.

Smoke detectors will be tested "in-place" using inert gas applied by a pyrotronics type applicator which is accepted throughout the industrial fire protection industry for testing products of combustion detectors or by use of the MSA chemical smoke generators.

Circuits checks by initiation of end of the line or end of the branch detectors will more thoroughly test the parallel circuits than testing on a rotating detector basis. This test is not a detector test, but is a test to simulate the effect of electrical supervision as defined in the NFPA Code 72 A-18, Article 240.

TABLE 3.13-1

FIRE DETECTION INSTRUMENTS

INSTRUMENT LOCATION	MINIMUM INSTRUMENTS OPERABLE	
	Infra-Red	Smoke
1. Control Room Back Panel Area El. 786'-0"		
a. Fire Detection Zone 1	-	3
b. Fire Detection Zone 2	-	7
c. Fire Detection Zone 3	-	8
2. Control Room Panels		
a. Fire Detection Zone 25	-	21
b. Fire Detection Zone 26	-	21
c. Fire Detection Zone 27	-	17
d. Fire Detection Zone 28	-	19
3. Cable Spreading Room El. 772'-6"		
a. Fire Detection Zone 5	-	9*
b. Fire Detection Zone 6	-	9*
c. Fire Detection Zone 7	-	9*
d. Fire Detection Zone 8	-	8*
4. Radwaste Control Room El. 786'-0"		
a. Fire Detection Zone 9	-	2
5. Station Battery Rooms El. 757'-6"		
a. Fire Detection Zone 13	-	1
b. Fire Detection Zone 14	-	1
c. Fire Detection Zone 17	-	1
6. Essential Switchgear Rooms El. 757'-6"		
a. Fire Detection Zone 15	-	2
b. Fire Detection Zone 16	-	2
7. Diesel-Generator Rooms El. 757'-6"		
a. Fire Detection Zone 21	5	-
b. Fire Detection Zone 22	5	-
8. Control Building HVAC Room El. 800'-4" Fire Zone 12-B	-	10
9. Reactor Building Remote Shutdown Panel 1C-388 El. 771'-9 1/2"		
a. Fire Zone 2-A	-	3

*No two adjacent detectors may be inoperable at the same time. Otherwise that zone is inoperable.

TABLE 3.13-1 (Continued)

FIRE DETECTION INSTRUMENTS

INSTRUMENT LOCATION	MINIMUM INSTRUMENTS OPERABLE	
	Infra-Red	Smoke
10. Refuel Floor El. 855'-0"		
a. Fire Detection Zone 33	-	16*
11. Reactor Building El. 833'-6"		
a. Fire Detection Zone 34	-	21*
12. Reactor Building El. 812'-0"		
a. Fire Detection Zone 35	-	18*
1. H&V Pump Room within Zone 35	-	1
13. Reactor Building El. 757'-6"		
a. Fire Detection Zone 37 (North)	-	22
b. Fire Detection Zone 38 (South)	-	23
14. Reactor Building El. 786'-0"		
a. Fire Detection Zone 39 (North)	-	23
b. Fire Detection Zone 40 (South)	-	21
15. Reactor Building Corner Rooms		
a. Fire Detection Zone 41 (Northeast)	-	2
b. Fire Detection Zone 42 (Northwest)	-	4
c. Fire Detection Zone 43 (Southeast)	-	4
d. Fire Detection Zone 44 (Southwest)	-	2
16. Pump House		
a. Fire Detection Zone 45	-	7
17. Intake Structure		
a. Fire Detection Zone 50	-	4
18. Turbine Building El. 734'-0"		
a. Fire Detection Zone 53	-	14
19. Computer Room El. 786'-0"		
a. Fire Detection Zone 29	-	2
20. Control Building Intake H&V Duct		
a. Fire Detection Zone 4	-	1

*No two adjacent detectors may be inoperable at the same time. Otherwise that zone is inoperable.

TABLE 3.13-2

REQUIRED FIRE HOSE STATIONS

Hose Station #1	Turbine Building, Column M-4	El. 734'-0"
Hose Station #2	Turbine Building, Column Q-6	El. 734'-0"
Hose Station #6	Turbine Building, Column K-12	El. 734'-0"
Hose Station #7	Turbine Building, Column N-13	El. 734'-0"
Hose Station #9	Turbine Building, Column Q-6	El. 757'-6"
Hose Station #10	Turbine Building, Column K-7	El. 757'-6"
Hose Station #12	Turbine Building, Column K-12	El. 757'-6"
Hose Station #14	Turbine Building, Column M-4	El. 780'-0"
Hose Station #21	Reactor Building, Column F-5.2	El. 757'-6"
Hose Station #22	Reactor Building, Column E-9.1	El. 757'-6"
Hose Station #23	Reactor Building, Column H-11.1	El. 757'-6"
Hose Station #24	Control Building, Column H-14	El. 757'-6"
Hose Station #25	Reactor Building, Column H-5.2	El. 786'-0"
Hose Station #26	Reactor Building, Column E-8	El. 786'-0"
Hose Station #27	Reactor Building, Column G-10.1	El. 786'-0"
Hose Station #28	Reactor Building, Column G-9.1	El. 812'-0"
Hose Station #29	Reactor Building, Column F-10.1	El. 812'-0"
Hose Station #35	Control Building, Column F-14	El. 772'-6"
Hose Station #36	Administration Building, F-12	El. 772'-6"
Hose Station #37	Administration Building, Ec-13.7	El. 786'-0"
Hose Station #38	Control Building, FC-11.2	El. 786'-0"
Hose Station #39	Turbine Building, K-13	El. 757'-6"
Hose Station #40	Reactor Building, J-5.2	El. 747'-0"
Hose Station #41	Reactor Building, E-6	El. 812'-0"
Hose Station #42	Reactor Building, E-6	El. 833'-6"
Hose Station #43	Reactor Building, E-5.2	El. 855'-0"
Hose Station #44	Reactor Building, E-10.1	El. 833'-6"
Hose Station #45	Reactor Building, E-10.1	El. 855'-0"
Hose Station #46	Pump House, A-2	El. 761'-0"

EVALUATION OF CHANGE WITH RESPECT TO 10 CFR 50.92

The enclosed application is judged to involve no significant hazards based upon the following information:

Four related but distinctly different projects are involved in this technical specification change request. However, all these changes are required to reflect DAEC conformance with 10 CFR Part 50, Appendix R, Section III.G and exemption requests granted by the NRC. A brief description of each of the projects and the required technical specification changes are as follows:

(a) Remote Shutdown Panels (RSPs)

The Remote Shutdown Panels (RSPs) are required to achieve and maintain cold shutdown of the DAEC nuclear reactor in the unlikely event the main Control Room becomes uninhabitable or is damaged by fire. The proposed technical specification change provides for periodic inspection and testing of the panels to verify operability. The inspection and operability requirements are consistent with those currently required for existing safe shutdown instrumentation.

The proposed inspection and testing requirements for the RSPs replace the existing requirements for the existing Emergency Shutdown Control Panel (ESCP) since the RSP system now incorporates the function of the ESCP. Incorporating the ESCP into the RSP system makes the ESCP one of the local control panels in the RSP system. Likewise, the proposed bases change the wording of paragraphs 3.10.B and 4.10.B to reflect the RSP system rather than the ESCP.

(b) Automatic Fire Suppression Systems

The Automatic Fire Suppression Systems are required to protect safety-related systems required for safe plant shutdown and must be operable whenever safe shutdown equipment in the protected area is required to be operable. The proposed technical specification change provides for periodic inspection and testing to verify operability of these new fire suppression systems.

(c) Heat Detectors and Ionization Smoke Detectors

These fire detection systems are required to protect safety-related systems when the safe shutdown equipment in the protected area is required to be operable. The proposed technical specification change provides for periodic testing and inspection to verify operability of the fire detection systems.

The bases on page 3.13-10 have been revised to incorporate the new fire detection instrumentation and provide compatibility with Table 3.13-1.

(d) Administrative Changes

The proposed technical specification change corrects three typographical errors which consist of an unneeded period on page iii, a misspelling

of the word "detection" on page 3.13-1, and the head of the fire pump discharge nozzle to the correct value of 108 psig. Correction of the discharge pressure is needed to be in conformance with the correct value found in the updated FSAR and the manufacturer's pump curve. On page 3.13-10 and Table 3.13-1, the "Control Auxiliary Panel Room" has been renamed the "Control Room Back Panel Area" to conform to terminology used by plant personnel. The existing "Zones" in Table 3.13-1 have been changed to "Fire Detection Zones" to distinguish them from the "Fire Zones" listed in the DAEC Fire Hazards Analysis (FHA).

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

Response:

(a) Remote Shutdown Panels (RSPs)

No. This technical specification change is required to reflect Duane Arnold Energy Center (DAEC) conformance with 10 CFR Part 50, Appendix R, Section III.G and exemptions granted by the NRC.

The Remote Shutdown Panels (RSPs) are required to achieve and maintain cold shutdown of the reactor in the unlikely event the main Control Room becomes uninhabitable or is damaged by fire. The proposed technical specification change provides for periodic inspection and testing to verify operability of the RSPs which incorporate the existing Emergency Shutdown Control Panel (ESCP), thereby superseding the ESCP inspection and testing requirements.

In the unlikely event that the Control Room becomes uninhabitable or is damaged by fire, transfer of reactor control to the RSPs is accomplished by actuation of transfer switches at the RSPs. The RSPs can assume reactor control only when these transfer switches are actuated. The RSP transfer switches are key-locked in their normal positions and the keys are controlled by the shift supervisor. In addition, the RSP transfer switches are enclosed to prevent tampering. Access to each panel is gained by opening a key-locked door. Opening these doors causes alarms in the Control Room, Central Alarm Station and Secondary Alarm Station. Therefore, the probability of inadvertent transfer and actuation of the RSPs is small.

Inadvertent actuation of any system controlled by the RSPs has already been evaluated in the FSAR. In addition, each RSP panel has been analyzed for the worst possible faults (hot shorts, open circuits and shorts to ground) that could result from a fire in the same fire zone as an RSP panel. A single operator error has no worse consequences than total destruction of an RSP panel by fire; therefore, this analysis also demonstrates that in the event of a single operator error at one RSP panel, the plant can be safely shutdown. Furthermore, the NRC has reviewed this method of alternate shutdown for BWRs and has issued a Safety Evaluation Report, dated January 6, 1983, approving its use at the DAEC.

Based on the discussion above, the probability or consequences of an accident are not increased.

(b) Automatic Fire Suppression Systems

No. This technical specification change is required to reflect DAEC conformance with 10 CFR Part 50, Appendix R, Section III.G and exemptions granted by the NRC.

The Automatic Fire Suppression Systems are required to protect certain safety-related systems, in case of fire, for safe plant shutdown. These technical specification changes provide for periodic testing and inspection to verify operability of these new fire protection systems.

To evaluate the effects of inadvertent actuation of these Automatic Fire Suppression Systems, the potential impact on safety-related systems due to spray and flooding must be considered. Under normal operating conditions, the inadvertent actuation of the sprinkler system in the control building equipment room (Zone 12-B) or the reactor building A/C chiller area 812' (Zone 4-A) may result in the loss of control building HVAC due to spray and possibly cause the Control Room to become uninhabitable. Should evacuation of the Control Room be necessary due to loss of HVAC, shutdown of the reactor is provided by the RSPs described above. The water discharge from the Automatic Fire Suppression System in the Control Building HVAC Equipment Room (Zone 12-B) above the Control Room, although not likely, may leak into the Control Room below and damage safe-shutdown equipment. If this occurs, shutdown of the reactor is provided by the RSPs. The Automatic Fire Suppression System sprinkler discharge on the cables located in Fire Zone 3-B does not pose a hazard that will affect safe operation or equipment function because the safety-related cabling is environmentally qualified for 100% relative humidity/wet environment (water spray). There is no safety-related equipment that is susceptible to water damage in Fire Zone 3-B sprinkler coverage.

Section 9.5.1.2.3.1 of the UFSAR evaluates the failure of fire protection system piping and the effects of flooding on safety-related equipment. A flood accumulation of water cannot occur above the ground floor level because water will flow freely down the stairs and hatches in the reactor building. The reactor building lower level is divided into watertight compartments equipped with floor drains which alarm on water buildup. The torus compartment contains safety-related equipment such as the isolation valve operators for the torus suction lines. However, the volume of this compartment is such that approximately 2 hours would be required to flood to the level of the operators at the rated flow of the fire pumps, thus providing ample time for operator action to isolate the flooding condition. Further, a pressure decrease in the fire system will cause an alarm in the control room permitting operator action within a short time.

Sprinkler systems piping located over essential safety systems are seismically supported to preclude damage during safe shutdown earthquake.

Based on the discussion above, the probability or consequences of an accident are not increased.

(c) **Fire Detection System (Heat and Smoke Detectors)**

No. This technical specification change is required to reflect DAEC conformance with 10 CFR Part 50, Appendix R, Section III.G and exemptions granted by the NRC. These detectors will be tested in the same manner as the existing detectors; therefore, the probability or consequences of an accident are not increased.

(d) **Administrative Changes**

The typographical errors corrected by the proposed technical specification change consist of an unneeded period on page iii, a misspelling of the word "detection" on page 3.13-1, and correcting the fire pump nozzle discharge pressure value. Changing the name of the "Control Auxiliary Panel Room" to the "Control Room Back Panel Area" conforms to terminology used by plant personnel and will eliminate a possible source of confusion. Changing the existing "Zones" in Table 3.13-1 to "Fire Detection Zones" clarifies the distinction between these detector zones and the "Fire Zones" described in the Fire Hazards Analysis (FHA).

These administrative changes do not change the meaning of the technical specifications and therefore do not increase the probability or consequences of an accident.

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

Response:

(a) **Remote Shutdown Panels (RSPs)**

No. Since the RSPs utilize plant systems which have already been evaluated in the FSAR and the RSPs are inspected and tested similar to the Control Room instrumentation, the possibility of a new or different kind of accident from any previously evaluated in the FSAR is not created.

(b) **Automatic Fire Suppression Systems**

No. Inasmuch as the Automatic Fire Suppression System is an expansion of the existing Automatic Fire Suppression System, there is no possibility of an accident or malfunction being created which is a different type than any evaluated previously in the FSAR.

(c) **Fire Detection System**

No. This technical specification change provides for periodic testing and inspection to verify operability of these fire detection systems. Since these detectors will be tested in the same manner as the existing detectors, the possibility of an accident of a different type than any previously evaluated in an FSAR is not created.

(d) Administrative Changes

The administrative changes described previously do not alter the meaning of the existing technical specifications; therefore, the possibility of a new or different kind of accident is not created.

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

Response:

(a) Remote Shutdown Panels (RSPs)

No. The installation of the RSPs should increase the margin of plant safety because the RSPs provide increased capability to place the reactor in cold shutdown in the unlikely event that the Control Room becomes uninhabitable or is damaged by fire. Furthermore, the NRC has reviewed this method of alternate shutdown for BWRs and has issued a Safety Evaluation Report, dated January 6, 1983, approving its use at the DAEC.

(b) Automatic Fire Suppression Systems

No. The Automatic Fire Suppression Systems equipment does not reduce the margin of safety. In fact, the Automatic Fire Suppression Systems will provide an added measure of protection for the safety-related equipment and components which are part of the safe shutdown systems.

(c) Fire Detection System (Heat and Smoke Detectors)

No. The heat and smoke detectors of the fire detection system will improve the margin of safety for protection of the safety-related equipment and components which are part of the safe shutdown systems.

(d) Administrative Changes

The administrative changes described previously do not alter the meaning of the existing technical specifications; therefore, there is no reduction in a margin of safety.

In the April 6, 1983 Federal Register, the NRC published examples of amendments that are not likely to involve a significant hazards concern. Example (i) of that list states:

> "A purely administrative change to technical specifications: for example, a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature."

Example (ii) of that list states:

> "An additional limitation, restriction, or control not presently in the Technical Specifications."

Based on the foregoing information, and this evaluation conducted in accordance with 10 CFR 50.92, this proposed license amendment does not involve a significant hazards concern as it clearly fits within the framework of the above examples.