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 LEAR, G. E. Division of Pressurized Water Reactor Licensing - A (post B)

SUBJECT: Application for amend to License DPR-13, consisting of
 proposed Change 136, revising Tech Specs re fire protection
 sys surveillance.

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December 17, 1985

Director, Office of Nuclear Reactor Regulation
Attention: Mr. G. E. Lear, Director
PWR Project Directorate No. 1
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Subject: Docket No. 50-206
Proposed Change No. 136
Fire Protection Technical Specifications
San Onofre Nuclear Generating Station
Unit 1

By letter dated June 8, 1984, Proposed Change No. 136 to the Technical Specifications for San Onofre Unit 1 was submitted as part of Amendment Application No. 120 for Provisional Operating License No. DPR-13. This proposed change provided an overall revision to the existing fire protection technical specifications to incorporate new equipment and revised concepts associated with more recent revisions of the Standard Technical Specifications. During NRC review of the proposed change, discussions were held with NRC staff members during which several revisions were requested. These revisions have been incorporated into the technical specifications provided as the enclosure to this letter.

The first major issue associated with the NRC requested revisions deals with the concept of Fire Area accessibility for fire watches as part of the Action requirements of the Limiting Conditions for Operation. The concept of a temporary inaccessibility of a fire area had been confused with the permanent inaccessibility during plant operation of certain other fire areas (e.g., containment). The rewording in the revised technical specification should resolve this confusion. These concepts are further explained in the Bases of the technical specifications.

The second major issue resulting in revisions to the proposed change is associated with the elimination of the proposed alternative to the fire watch patrols in the ACTION statements. This alternative consisted of the establishment of the operability of the detection system in a fire area if the suppression system was inoperable and vice versa, in lieu of a fire watch patrol. The NRC staff indicated that this was an unacceptable alternative at the present time. The affected portions of the proposed change have been revised accordingly.

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The third major issue to arise from the NRC review is associated with the surveillance of fire doors. The proposed change would have reduced the frequency of fire door surveillance. The NRC staff indicated that this was unacceptable and the Standard Tech Spec frequencies are required at this time. The affected surveillance of the proposed change have been revised accordingly.

The last issue to result from the NRC review was the use of automatic suppression as a compensatory measure in the ACTION statement of the fire barrier technical specifications. The compensatory measure consists of utilizing automatic suppression in lieu of fire detectors in the ACTION statement. The NRC staff indicated that this is acceptable when justification is provided on a case by case basis. This compensatory measure has been used for several walls at San Onofre Unit 1. Sprinkler system #4 is designed to specifically protect the fire barriers located at the North Wall of the Turbine Building and the East and South Walls of the 480 V Room. Sprinkler system #5 is being utilized for the North Wall of the Turbine Building, the East Wall of the 480 V Room and the West Wall of the 4160 V Room. These sprinkler systems provide adequate protection for the fire barriers identified above. This protection is in addition to other immediate fire suppression systems in the area.

An additional revision has been made to Table 3.14.3, "Fire Detection Instruments," to further update the listing of the detector configuration at the plant. As indicated in the original Proposed Change No. 136, this table was updated to reflect the new detectors added since the last issuance of the table. The revised table provided in the enclosure to this letter reflects additional changes made to the fire detection systems as documented in the Updated Fire Hazards Analysis, transmitted to the NRC by letter dated February 11, 1985. The change in Detector Zone 16 is associated with modifications which will be made during the current outage.

Based on our review of the information included in the enclosure, there is no change to our previous conclusion stated in our June 8, 1984 letter that these proposed changes do not constitute a significant hazards consideration.

If you have any questions or desire additional information, please contact me.

Very truly yours,

M. O. Medford

Enclosure