

ATTACHMENT A

NIAGARA MOHAWK POWER CORPORATION

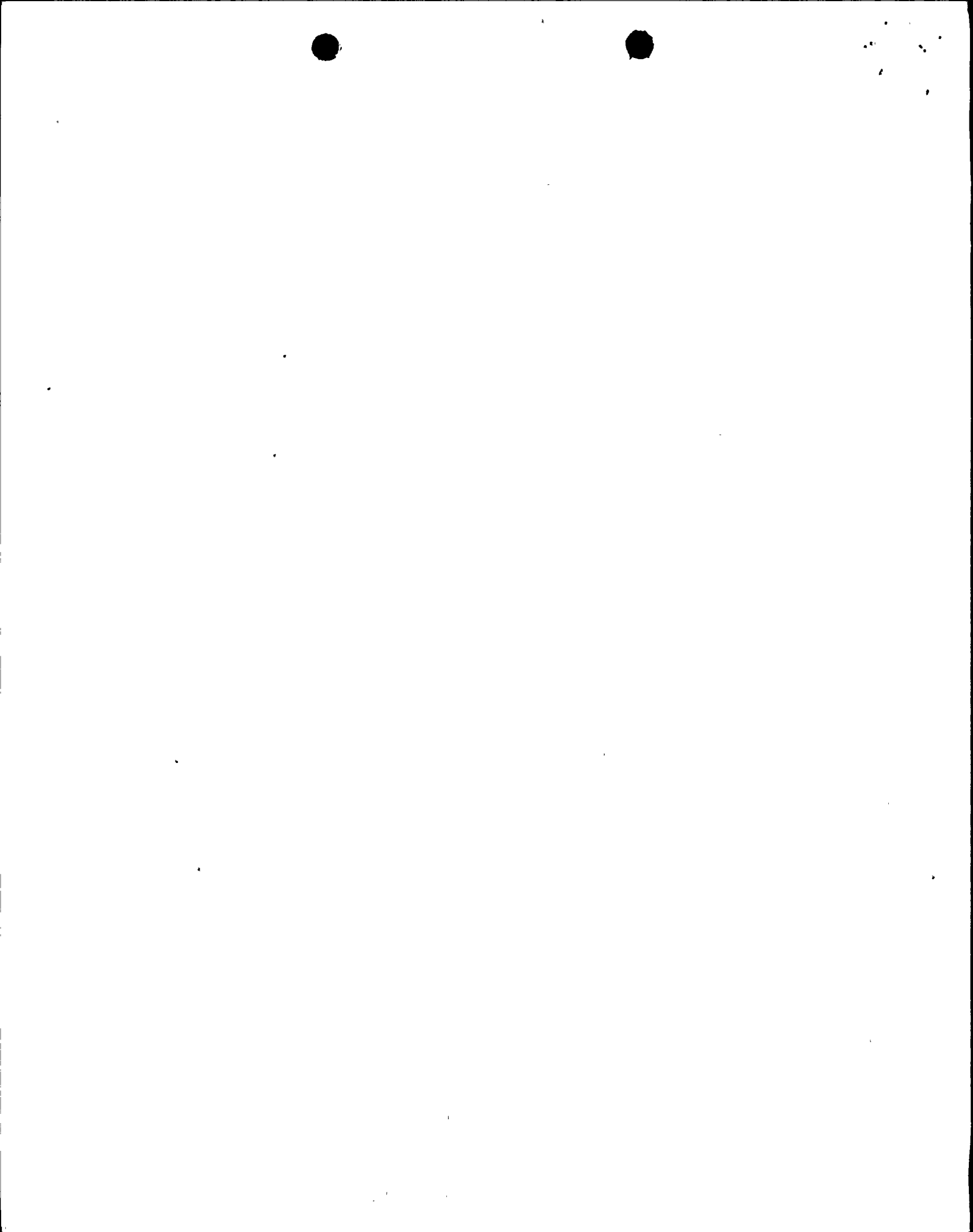
LICENSE NO. DPR-63

DOCKET NO. 50-220

Proposed Changes to Technical Specifications

Existing pages 241m, 241p, 241q, 241q1, 241s, 241s1, 241t, 241t1, 241u, 241v, 241w, 241y, 241y1, 241cc, 241dd1, 241dd3 and 265 will be replaced with the attached revised pages and new page 241cc1 is added. These pages have been retyped in their entirety with marginal markings to indicate changes to the text.

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LIMITING CONDITION FOR OPERATION

SURVEILLANCE REQUIREMENT

3.6.6 FIRE DETECTION

Applicability:

Applies whenever equipment protected by the fire detection instrumentation is required to be operable.

Objective:

To assure the capability of fire detection instrumentation for each fire detection zone shown in Table 3.6.6a to provide fire detection.

Specification:

- a. Whenever equipment protected by the fire detection instruments is required to be operable, the minimum number of detectors required operable is specified in Table 3.6.6.a. With the number of operable detectors, less than the number required by Table 3.6.6.a.
 1. Within one hour, establish a fire watch patrol to inspect the zone with the inoperable detector(s)

4.6.6 FIRE DETECTION

Applicability:

Applies to the periodic surveillance of the fire detection system.

Objective:

To assure the operability of the fire detection instrumentation for each fire detection zone shown in Table 3.6.6a to provide fire detection.

Specification:

- a. Each of the fire detectors shall be demonstrated OPERABLE:
 1. By performance of an instrument channel test at least once per six months for all detection devices.



BASES FOR 3.6.6 AND 4.6.6 FIRE DETECTION

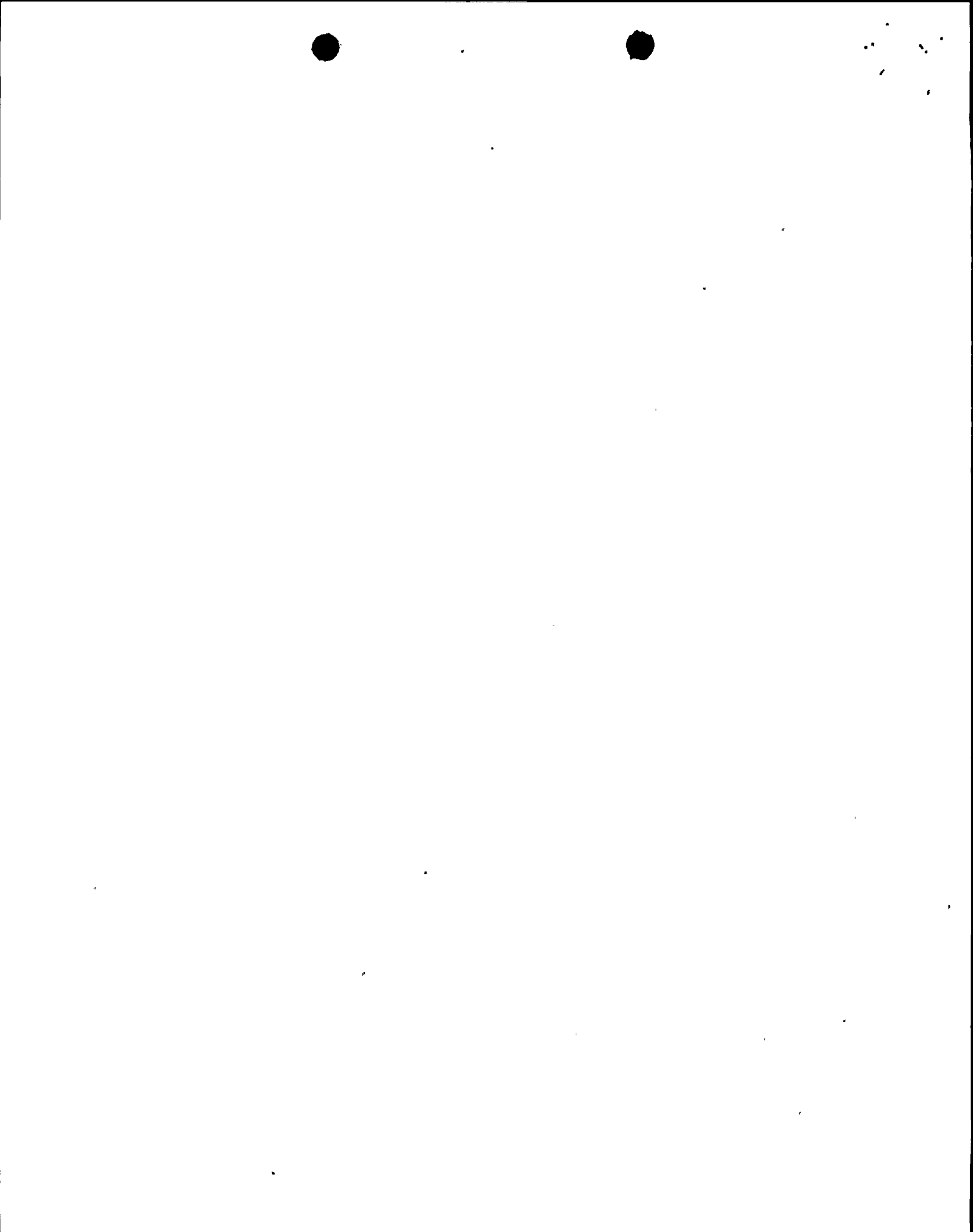
The basic function and capabilities of the system are to provide the means to detect fires with a visual indication of its location and an audible alarm at central points, and also to control certain ancillary actions, such as extinguishment and ventilation subsequent to the detection of fire.

The system is comprised of nine (9) Local Fire Alarm Control Panels (LFACP) located throughout the Reactor Building, Turbine Building and Administration Building, primarily in a central location to the zones of fire detection for which each panel serves. In addition there is a Main Fire Alarm Control Panel (MFACP-2), in the Control Room to which all nine (9) panels report, and their indications and control functions are duplicated.

Five types of detection instruments are employed in the system:

- a) Ionization Smoke
- b) Photoelectric Smoke
- c) Infrared
- d) Thermal
- e) Thermistor Wire

The configuration of the fire detection instrument locations has been examined and found satisfactory to detect a fire with the minimum number of detectors operable as indicated in Table 3.6.6a.



LIMITING CONDITION FOR OPERATION

SURVEILLANCE REQUIREMENT

3.6.7 FIRE SUPPRESSION WATER SYSTEM

Applicability:

Applies to the operational status of the fire suppression water system.

Objective:

To assure the capability of the fire suppression system to provide fire suppression water system in the event of a fire.

Specification:

- a. The FIRE SUPPRESSION WATER SYSTEM shall be OPERABLE with;
 - 1. Two operable fire suppression pumps each with a capacity of 2500 gal./min. with their discharge aligned to the fire suppression header; and
 - 2. Automatic initiation logic for each fire pump.
- b. With one pump inoperable or water supply line inoperable, restore the inoperable equipment to OPERABLE status within 7 days or provide an alternate backup pump or water supply.

4.6.7 FIRE SUPPRESSION WATER SYSTEM

Applicability:

Applies to the surveillance of the fire suppression water system.

Objective:

To assure the operability of the fire suppression system to provide fire suppression water system in the event of a fire.

Specification:

- a. The FIRE SUPPRESSION WATER SYSTEM shall be demonstrated OPERABLE:
 - 1. At least once per 31 days by starting each pump and operating it for 30 minutes on recirculation flow.
 - 2. At least once per 31 days by verifying that each valve (manual, power operated or automatic) in the flow path is in its correct position.
 - 3. At least once per 12 months by cycling each manually-operable valve through one complete cycle.
 - 4. At least once per 6 months by a flush of the hydrants.
 - 5. At least once per operating cycle.
 - (a) By performing a system automatic start on low header pressure.



LIMITING CONDITION FOR OPERATION

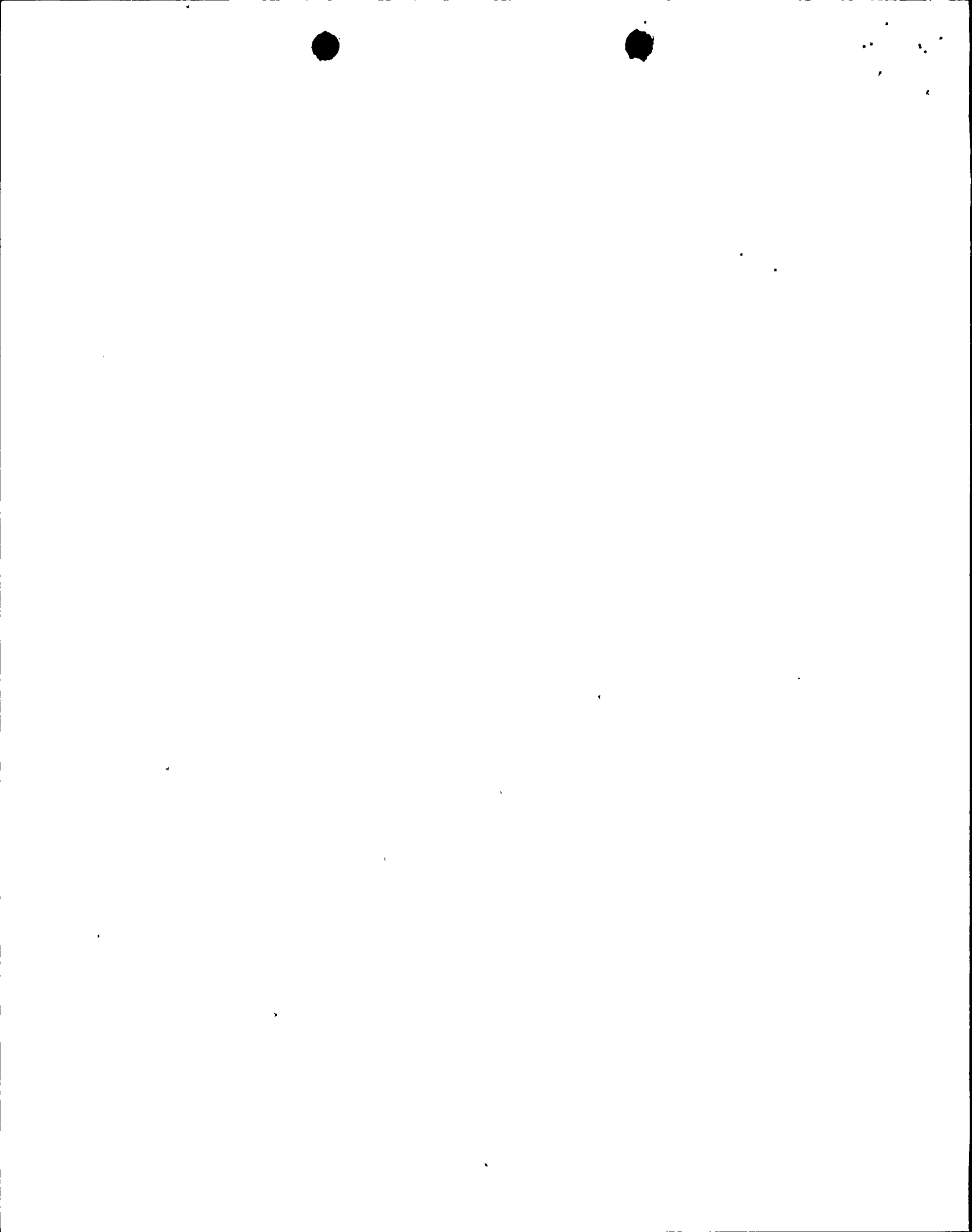
3.6.7 FIRE SUPPRESSION WATER SYSTEM (Continued)

- c. With no FIRE SUPPRESSION WATER SYSTEM operable, within 24 hours:
 - 1. Establish a backup fire suppression system.
- d. The spray and sprinkler systems located in the following areas shall be OPERABLE, whenever the equipment protected by the spray and/or sprinkler system is required to be operable.
 - 1. Automatic water spray systems
 - (a) Reserve Transformer 101N
 - (b) Reserve Transformer 101S

SURVEILLANCE REQUIREMENT

4.6.7 FIRE SUPPRESSION WATER SYSTEM (Continued)

- (b) By verifying that each pump will develop a flow of at least 2500 gpm at a pump discharge of 115 psig.
- (c) Cycling each valve in the flow path that is not testable during plant operation through at least one complete cycle of full travel.
- (d) Verifying that each automatic valve in the flow path actuates to its correct position.
- 6. At least once per 3 years by performing a flow test of the system in accordance with Chapter 8, Section 16 of the Fire Protection Handbook, 15th Edition, published by the National Fire Protection Association.
- b. The fire pump diesel engine shall be demonstrated OPERABLE:
 - 1. Daily by checking the starting air tank pressure
 - 2. At least once per 31 days by verifying:
 - (a) That the fuel day storage tank contains at least 150 gallons of fuel.



LIMITING CONDITION FOR OPERATION

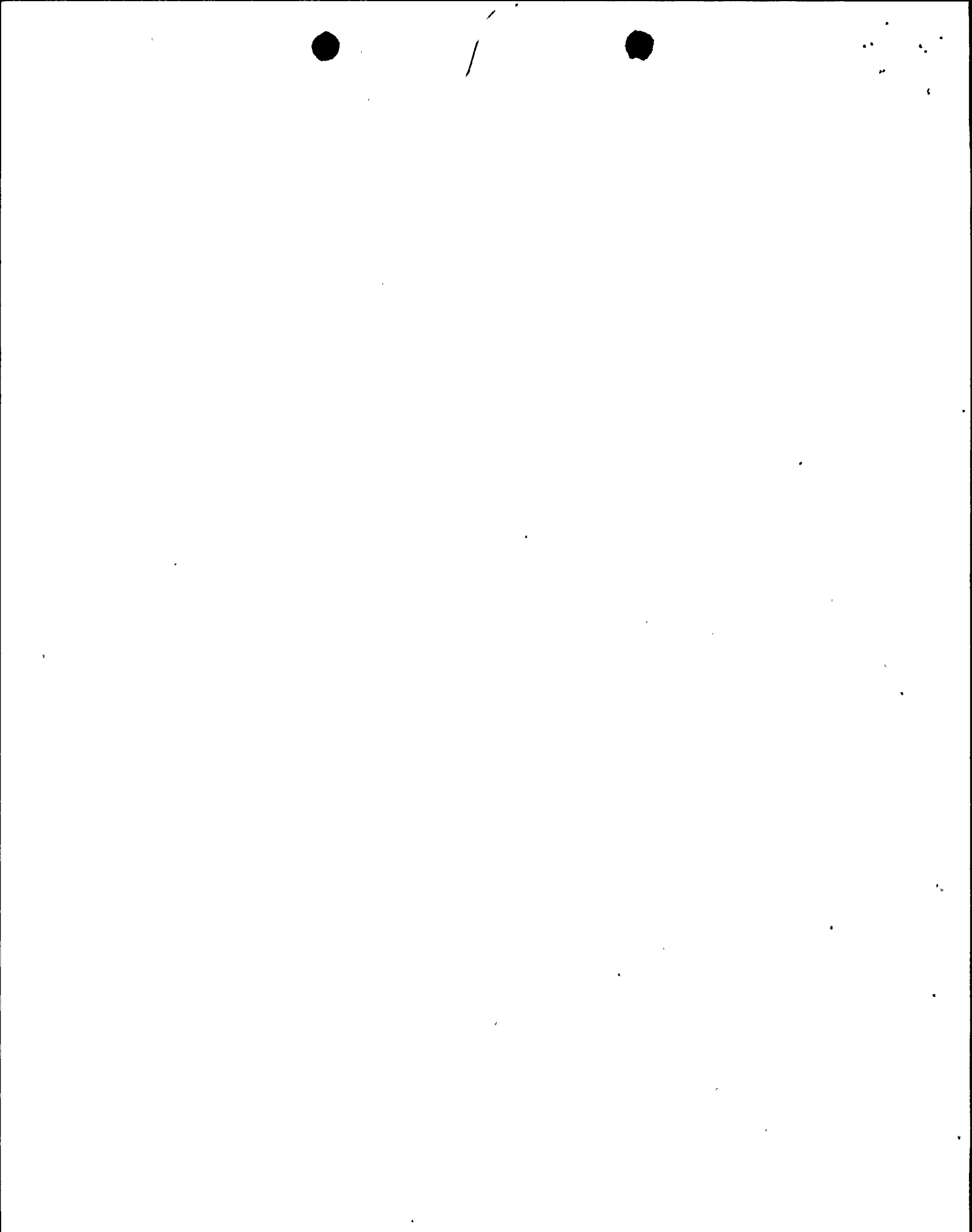
3.6.7 FIRE SUPPRESSION WATER SYSTEM (Continued)

2. Automatic Sprinkler System for the Diesel Fire Pump Room in the Screen House.
3. Pre-Action Systems:
 - (a) Rx Bldg., El. 237
 - (b) Rx Bldg., El. 261
 - (c) Rx Bldg., El. 318
 - (d) Turb. Bldg., El. 250 South
 - (e) Turb. Bldg., El. 250 West
 - (f) Turb. Bldg., El. 250 North
 - (g) Turb. Bldg., El. 250 East
 - (h) Diesel Gen., El. 250
 - (i) Cable Spreading Room
 - (j) Turb. Bldg., El. 261 South
 - (k) Turb. Bldg., El. 261 North
 - (l) Turb. Bldg., El. 261 East
 - (m) Turb. Bldg., El. 277 East
 - (n) Turb. Bldg., El. 300 Storage Area
- e. With a spray or sprinkler system inoperable, establish a fire watch patrol with backup fire suppression equipment for the unprotected area within one hour.
- f. With a pre-action system inoperable, trip system wet or establish a fire watch patrol with backup fire suppression equipment for the unprotected area within one hour.

SURVEILLANCE REQUIREMENT

4.6.7 FIRE SUPPRESSION WATER SYSTEM (Continued)

- (b) The fuel storage tank contains at least 1000 gallons of fuel.
- (c) The fuel transfer pump starts and transfers fuel from the storage tank to the day tank.
- (d) The diesel starts from ambient conditions and operates for greater than or equal to 30 minutes on recirculation flow.
- (e) The method of starting the diesel fire engine will alternate between the normal air start method and the low air pressure start.
3. 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 specified in Table 1 of ASTM D975-74 with respect to viscosity, water and sediment.
4. At least once per six months by using the manual bypass of the solenoid on the starting air system.



LIMITING CONDITION FOR OPERATION

3.6.7 FIRE SUPPRESSION WATER SYSTEM (Continued)

SURVEILLANCE REQUIREMENT

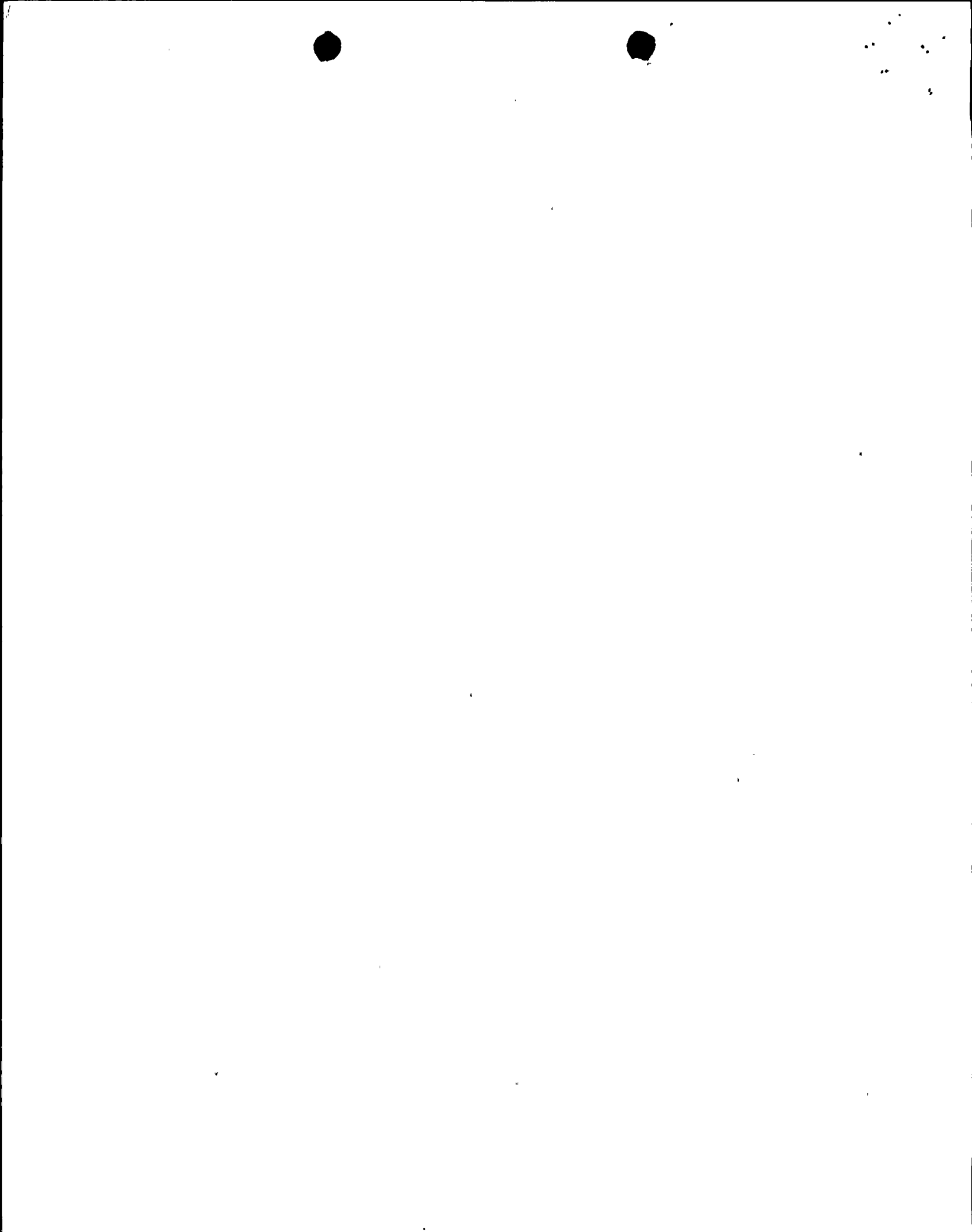
4.6.7 FIRE SUPPRESSION WATER SYSTEM (Continued)

4. At least once per 18 months, subjecting the diesel to an inspection in accordance with procedures prepared in conjunction with its manufacturer's recommendations for the class of service, and verifying the diesel starts from ambient conditions on the auto-start signal and operates for greater than or equal to 30 minutes while loaded with the fire pump.
- c. The spray systems shall be demonstrated to be OPERABLE:
 1. At least once per 31 days by verifying that each valve, manual, power operated or automatic, in the flow path is in its correct position.
 2. At least once per year by cycling each manually operable valve through one complete cycle.
 3. At least once per operating cycle.
 - (a) By performing a system functional test which includes simulated automatic actuation of the system and verifying that the automatic deluge valves in the flow path actuate to their correct positions.
 - (b) By visual inspection of spray headers to verify their integrity.



4.6.7 FIRE SUPPRESSION WATER SYSTEM (Continued)

- (c) By visual inspection of each nozzle to verify no blockage.
- 4. At least once per 3 years by performing an air or water flow test through each open head spray heater and verifying each open head spray nozzle is unobstructed.
- d. The sprinkler system shall be demonstrated to be OPERABLE:
 - 1. At least once per operating cycle.
 - (a) By performing a system functional test which includes simulated automatic actuation of the system.
 - (b) By visual inspection of sprinkler headers to verify their integrity.
 - (c) By visual inspection of each nozzle to verify no blockage.



BASES FOR 3.6.7 AND 4.6.7 FIRE SUPPRESSION WATER SYSTEM

The fire water supply is provided by two vertical turbine fire pumps, one electric and a diesel-driven unit which are design rated at 2500 gpm at 125 psig pump discharge head. These pumps are located in the screen house and take suction from the station cooling water intake tunnel and have relief valves set at 140 psig.

The automatic initiation logic for each fire pump indicated in Specification 3.6.7.a.2 requires that these pumps are automatically started together upon a drop in discharge header pressure. Each pump can also be manually started. In addition, the diesel fire engine will be started on low air pressure at alternate testing intervals to verify the adequacy of the low air pressure start system. A bypass of the starting air solenoid valves is provided for additional assurance in starting the diesel fire engine.

The verification of the hydraulic performance of the fire suppression water system required once per 3 years in Surveillance Requirement 4.6.7.a.5 will be done by means of a measured hydrant flow test.

The redundant components in the fire water supply system are the fire pumps, which discharge to the same header. They are the only components addressed in Specification 3.6.7.b.

The backup water supply system referenced in Specification 3.6.7.c.1 is the Oswego City water system, which can be connected to the fire main if required.

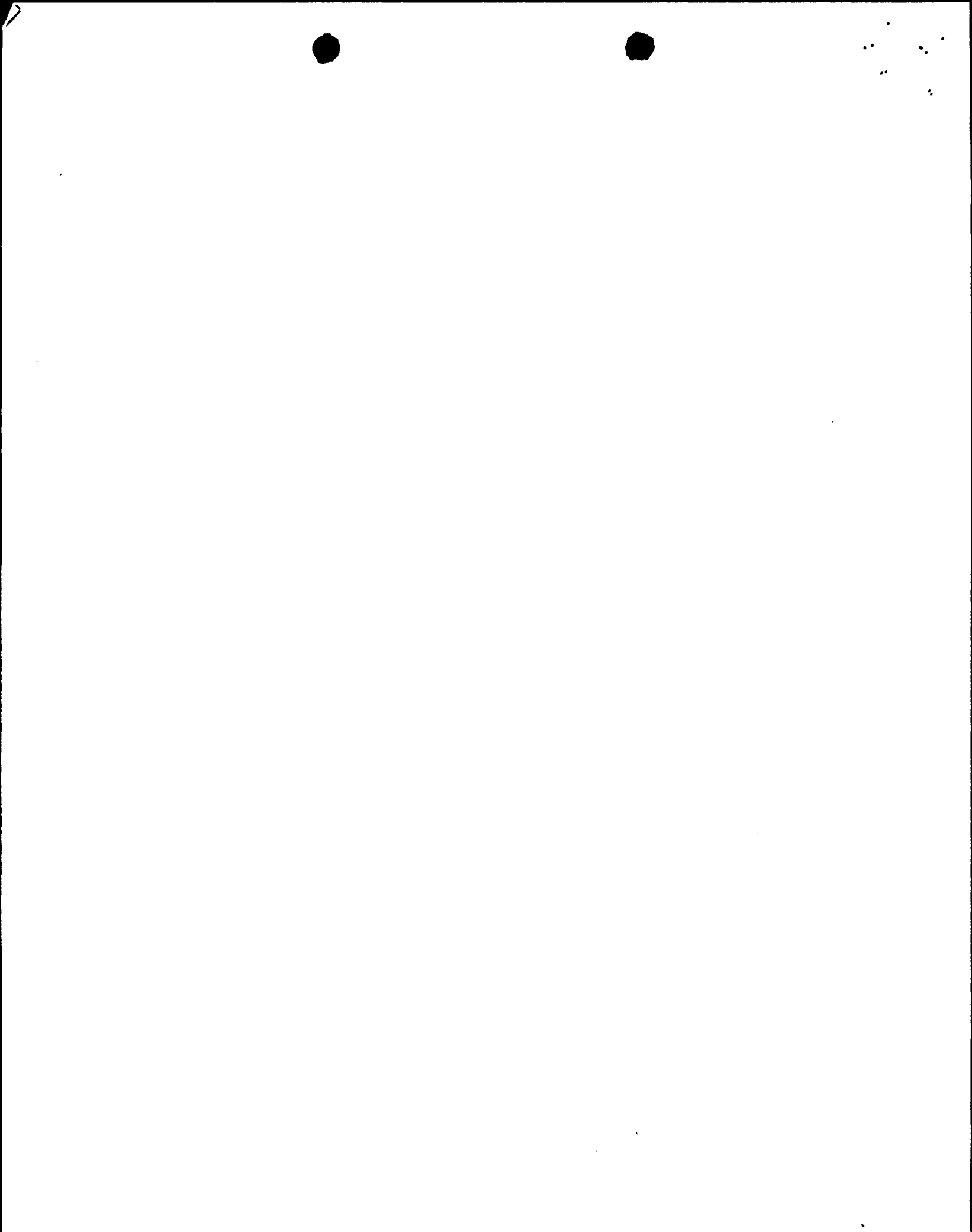
The water spray systems provide fire protection for the safety-related reserve transformers 101N and 101S. Supply for these systems is provided by the fire line. The systems employ open nozzles and are controlled by deluge valves. Valve actuation is by pneumatic type rate-of-rise devices installed over the protected equipment.

In addition to the automatic operation, systems may be tripped manually either at the deluge valves on elevation 250' or at remote cable pull stations on elevation 261'.

The fire control panel annunciator records system operation, low supervisory air pressure and valve closure.

In addition to the spray systems described above, a closed head wet pipe automatic sprinkler system is provided for the diesel fire pump room in the Screen House on Elevation 254. The sprinkler heads used have fusible elements rated at 165°F. The system has flow alarms connected to the fire control panel annunciator.

Fourteen pre-action type systems are used for various hazards throughout the plant. These systems employ closed heads, under an air pressure of 20 psig, and are controlled by a pre-action type valve.

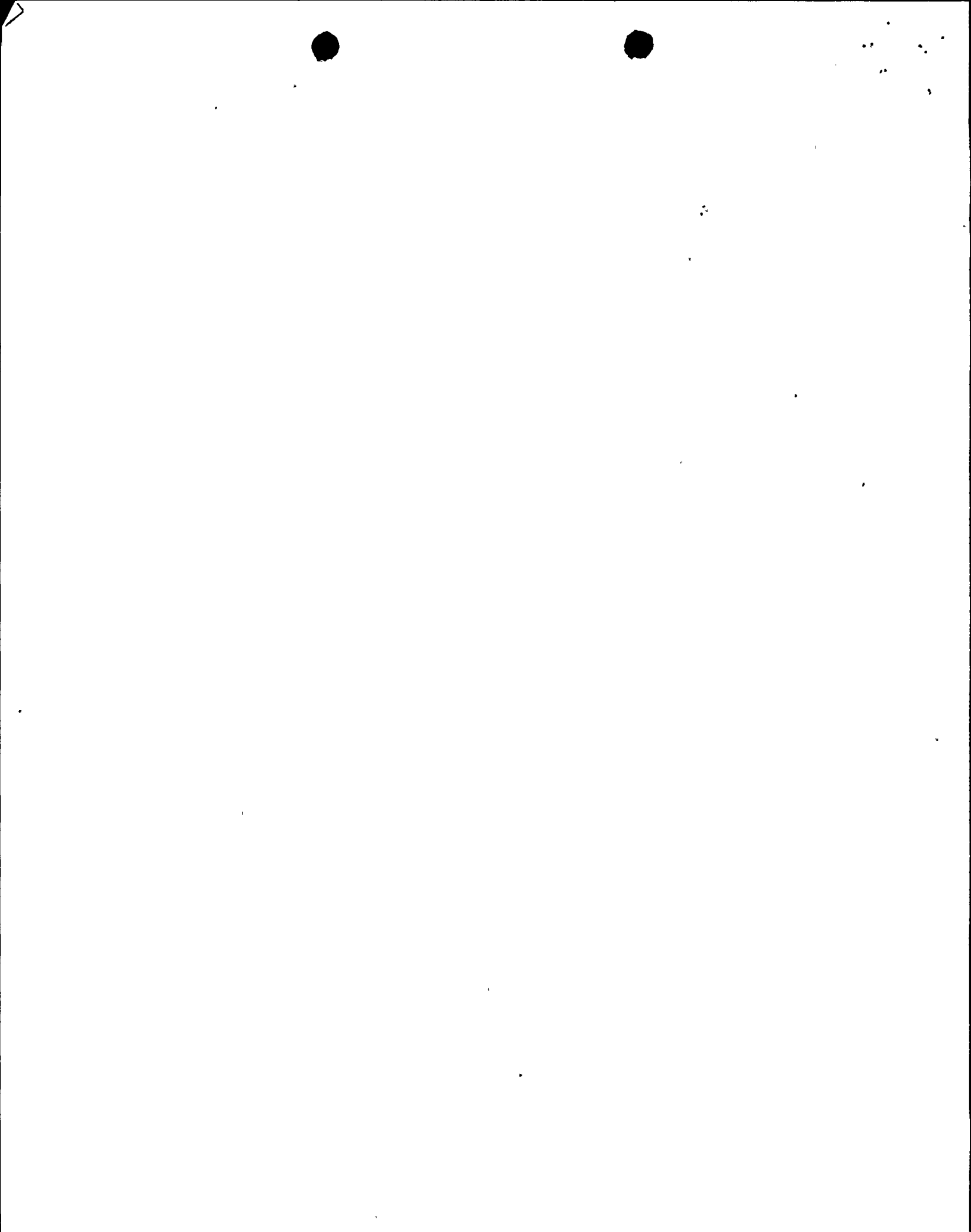


BASES FOR 3.6.7 AND 4.6.7 FIRE SUPPRESSION WATER SYSTEM

(Continued)

Valve actuation is automatic by ionization type detectors installed over the protected equipment. In addition to the automatic operation, systems may be tripped manually either at the pre-action valve or from the Main Fire Panel in Control Room.

System operation, low supervisory air pressure and valve closure is monitored on both the Main Fire Control and Local Fire Panels.



LIMITING CONDITION FOR OPERATION

3.6.8 CARBON DIOXIDE SUPPRESSION SYSTEM

Applicability:

Applies whenever equipment protected by the carbon dioxide systems is required to be operable.

Objective:

To assure the capability of the carbon dioxide suppression system to provide fire suppression in the event of a fire.

Specification:

- a. The CO₂ system, which supplies the Recirculation Pumps Motor-Generator Sets, Power Boards 102 and 103, Diesel Generators 102 and 103, Cable Room fire hazards, shall be OPERABLE with a minimum level of 40% of tank and a minimum pressure of 250 psig in the storage tank, whenever the equipment protected by the CO₂ system is required to be operable.
- b. With one or more of the above required CO₂ systems inoperable, within one hour establish a continuous fire watch with backup fire suppression equipment for those areas in which redundant systems or components could be damaged.
- c. The Auxiliary Control Room CO₂ system shall be operated as a manual backup for the Halon System.

SURVEILLANCE REQUIREMENT

4.6.8 CARBON DIOXIDE SUPPRESSION SYSTEM

Applicability:

Applies to the periodic surveillance requirements of the carbon dioxide suppression system.

Objective:

To verify the operability of the carbon dioxide suppression system.

Specification:

- a. The CO₂ system shall be demonstrated operable.
 1. At least once per 7 days by verifying the CO₂ storage tank level and pressure.
 2. At least once per 31 days by verifying that each valve, manual power operated or automatic, in the flow path is in its correct position.
 3. At least once every six months by verifying the system valves and associated ventilation dampers actuate automatically to a simulated actuation signal. A brief flow test shall be made to verify flow from each nozzle ("Puff Test").



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BASES FOR 3.6.8 AND 4.6.8 CARBON DIOXIDE SUPPRESSION SYSTEM

A low pressure carbon dioxide system is installed to serve seven different safety-related hazard points in the station indicated in Specification 3.6.8.a.

Supply is provided by a 10 ton tank of liquid carbon dioxide located on elevation 261 feet. The self-contained refrigeration unit maintains the liquid at 0°F with a resultant pressure of 300 psig. Carbon dioxide to the individual hazards is controlled by a series of carbon dioxide operated, pilot type master valves at the tank. Each of these valves serve a group of hazard valves of similar construction located at the individual areas.

Fire extinguishment by carbon dioxide is either by total flooding or local application. In total flooding, sufficient CO₂ is injected into a closed room or space to inert the atmosphere and suppress combustion. Local application is employed for unenclosed areas and involves application of CO₂ on the equipment protected to extinguish the fire with additional discharge to permit cooling and inhibit reflash.

The automatically actuated CO₂ systems employ either thermostats set at 225°F or smoke detectors to trip a timer located in the main cardox control cabinet. One or more sirens and a strobe light in the hazard area are initially operated for a pre-discharge period of 30 seconds to enable personnel to leave the area. The related master and hazard valves are then opened for a timed discharge period. Restoration of the CO₂ hazard area to service is accomplished manually by pushbutton at the fire control panel. Manual pushbutton stations are also located at the individual areas to initiate the cycle. The control switch for each area on the fire control panel has three positions and is normally set for "Automatic" operation. An "Alarm only" position permits greater safety when men are working in the hazard area and the 30 second delay may be insufficient.

A "Manual" position permits the operator to actuate the discharge cycle on his own initiative. An area pushbutton station will override the "Alarm only" setting on the Fire Control Panel. Due to the high rate of personnel access, and thus safety requirements, the Auxiliary Control Room CO₂ system is a manual system, used to backup a total flood automatic 6% Halon system.

All CO₂ systems except hose reels are provided with odorizing devices as a safety measure. A glass flask of wintergreen concentrate is inserted in a capped tee beyond each hazard valve. This flask ruptures upon operation of the hazard and must be replaced after each use.

In the event of total loss of D.C. control power to the CO₂ system, all master valves will open since their pilot valve solenoids are normally energized. The CO₂ system hazard valves remain closed since their pilot valve solenoids are normally de-energized. CO₂ can be discharged into an area by operating the manual lever provided in each pilot valve cabinet. This is a manual operation without pre-discharge alarm or timer.



LIMITING CONDITION FOR OPERATION

3.6.9 FIRE HOSE STATIONS

Applicability:

Applies whenever equipment in the areas protected by the fire hose stations is required to be operable.

Objective:

To assure the capability of the fire hose stations to provide fire suppression in the event of a fire.

Specification:

- a. The fire hose stations in the locations shown in Table 3.6.9a shall be operable, whenever equipment in the areas protected by the fire stations is required to be operable.
- b. With one or more of the fire hose stations shown in Table 3.6.9a inoperable, provide gated wye(s) on the nearest OPERABLE hose station(s). One outlet of the wye shall be connected to the standard length of hose provided for the hose station. The second outlet of the wye shall be connected to a length of hose sufficient to provide coverage for the area left unprotected by the inoperable hose station. Where it can be demonstrated that the physical routing of the fire hose would result in a recognizable hazard to operating technicians, plant equipment, or

SURVEILLANCE REQUIREMENT

4.6.9 FIRE HOSE STATIONS

Applicability:

Applies to the periodic surveillance of the fire hose stations.

Objective:

To assure the operability of the fire hose station to provide fire suppression in the event of a fire.

Specification:

- a. Each fire hose station shown in Table 3.6.9a shall be verified to be OPERABLE:
 1. At least once per 31 days by visual inspection of the fire hose stations accessible during plant operation to assure all required equipment is at the station.
- b. At least once per operating cycle by:
 1. Visual inspection of the fire hose stations not accessible during plant operation to assure all required equipment is at the hose station.
 2. Removing the hose for inspection and re-racking.
 3. Inspecting all gaskets and replacing any degraded gaskets in the couplings.



LIMITING CONDITION FOR OPERATION

3.6.9 FIRE HOSE STATIONS (cont'd)

the hose itself, the fire hose shall be stored in a roll at the outlet of the OPERABLE hose station. Signs shall be mounted above the gated wye(s) to identify the proper hose to use. The above shall be accomplished within 1 hour if the inoperable fire hose is the primary means of fire suppression; otherwise route the additional hose within 24 hours.

SURVEILLANCE REQUIREMENT

4.6.9 FIRE HOSE STATIONS (Continued)

- c. At least once per 3 years by:
1. Partially opening each hose station valve to verify valve operability and no flow blockage.
 2. Conducting a hose hydrostatic test at a pressure at least 50 psig greater than the maximum pressure available at any hose station.



LIMITING CONDITION FOR OPERATION

3.6.10 ADDITIONAL FIRE EQUIPMENT

3.6.10.1 FIRE BARRIER PENETRATIONS

Applicability:

Applies to the condition of the fire barrier penetrations, including cable penetration barriers, fire doors and fire dampers.

Objective:

To assure the capability of the fire barrier penetrations to perform their intended function.

Specification:

- a. Fire barrier assemblies, including 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 sealing devices in fire rated assembly penetrations, including fire doors, fire dampers, cable and piping penetration seals shall be OPERABLE.

SURVEILLANCE REQUIREMENT

4.6.10 ADDITIONAL FIRE EQUIPMENT

4.6.10.1 FIRE BARRIER PENETRATIONS

Applicability:

Applies to the periodic surveillance requirements for the fire barrier penetrations.

Objectives:

To verify the condition of the fire barrier penetrations.

Specification:

- a. Each of the required fire rated assemblies and penetration sealing devices shall be verified OPERABLE at least once per operating cycle by performing a visual inspection of:
 1. The exposed surfaces of each fire rated assembly.
 2. Each fire damper and associated hardware.



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LIMITING CONDITION FOR OPERATION

3.6.10.1 ADDITIONAL FIRE EQUIPMENT (cont'd)

- b. With one or more of the above required fire rated assemblies and/or sealing devices inoperable, within one hour establish a continuous fire watch on at least one side of the affected assembly(s) and/or sealing device(s) or verify the OPERABILITY of fire detectors on at least one side of the inoperable assembly(s) and/or sealing device(s) and establish an hourly fire watch patrol.

SURVEILLANCE REQUIREMENT

4.6.10 ADDITIONAL FIRE EQUIPMENT (cont'd)

3. At least 10 percent of each type of sealed penetration. If apparent changes in appearance or abnormal degradations are found, a visual inspection of an additional 10 percent of each type of sealed penetration shall be made. This inspection process shall continue until a 10 percent sample with no apparent changes in appearance or abnormal degradation is found. Samples shall be selected such that each penetration seal will be inspected at least once per 15 years.
- b. Each of the required fire doors shall be verified OPERABLE by inspecting release and closing mechanism and latches at least once per 6 months.
 1. That each locked-closed fire door is closed at least once per 7 days.
 2. That doors with release mechanisms are free of obstructions at least once per 24 hours and performing a functional test of these mechanisms at least once per operating cycle.
 3. That each unlocked fire door is closed at least once per 24 hours.



LIMITING CONDITION FOR OPERATION

SURVEILLANCE REQUIREMENT

3.6.10.2 HALON SUPPRESSION SYSTEM

Applicability:

Applies whenever equipment protected by the Halon systems is required to be operable.

Objective:

To assure the capability of the Halon suppression system to provide fire suppression in the event of a fire.

Specification:

- a. The Halon systems which supply the Auxiliary Control and Emergency Condenser I.V. Rooms shall be operable, with the storage tanks having at least 95% of full charge weight or level and 90% of full charge pressure, whenever the equipment protected by the Halon system is required to be operable.
- b. With a Halon system inoperable, within one hour establish a continuous fire watch with backup fire suppression equipment.

4.6.10.2 HALON SUPPRESSION SYSTEM

Applicability:

Applies to the periodic surveillance requirement of the Halon suppression system.

Objective:

To verify the operability of the Halon suppression system.

Specification:

- a. Each of the required Halon systems shall be demonstrated operable:
 1. At least once per 31 days by verifying that each valve, manual, power operated or automatic, in the flow path is in its correct position.
 2. At least once per 6 months by verifying Halon storage tank weight or level and pressure.
 3. At least once per 18 months by:
 - (a) Verifying the system and associated ventilation dampers and fire door release mechanisms actuate manually and automatically.
 - (b) Performance of a flow test through headers and nozzles to assure no blockage.



LIMITING CONDITION FOR OPERATION

3.6.10.3 YARD FIRE HYDRANTS AND HYDRANT HOSE HOUSES

Applicability:

Applies whenever equipment in the areas protected by the yard fire hydrants is required to be operable.

Objectives:

To assure the capability of the yard fire hydrant to provide fire suppression in the event of a fire.

Specification:

- a. The yard fire hydrants shown in Table 3.6.10.3a shall be operable, whenever equipment in the areas protected by the yard fire hydrants is required to be operable.
- b. With one or more of the yard fire hydrants or associated hydrant houses shown in Table 3.6.10.3a inoperable, route sufficient additional lengths of 2-1/2 inch diameter hose located in an adjacent operable hydrant hose house to provide service to the unprotected area(s) within one hour, if the inoperable fire hydrant is the primary means of fire suppression, otherwise, route an additional hose within 24 hours. Where it can be demonstrated that physical routing of fire hose would result in a recognizable hazard to operating personnel, plant equipment or the hose itself, the fire hose shall be stored in a roll at the outlet of the OPERABLE hydrant or hydrant houses. Signs shall be mounted to identify proper usage.

SURVEILLANCE REQUIREMENT

4.6.10.3 YARD FIRE HYDRANTS AND HYDRANT HOSE HOUSES

Applicability:

Applies to the periodic surveillance requirement of the yard fire hydrants and associated hose houses.

Objective:

To assure the operability of the yard fire hydrant to provide fire suppression in the event of a fire.

Specification:

- a. Each of the yard fire hydrants and associated hose houses shown in Table 3.6.10.3a shall be demonstrated operable:
 1. At least once per 31 days by visual inspection of the hydrant hose house to assure all required equipment is at the hose house.
 2. At least once per 6 months during March, April, May and during September, October and November by visually inspecting each yard fire hydrant and verifying that the hydrant barrel is dry and that the hydrant is not damaged.
 3. At least once per 12 months by:
 - (a) Conducting a hose hydrostatic test at a pressure at least 50 psig greater than the maximum pressure available at any yard fire hydrant.
 - (b) Replacement of all degraded gaskets in couplings.

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6.9.1 Routine Reports (cont'd)

Changes to the Offsite Dose Calculation Manual (ODCM): Shall be reported to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the change(s) was made effective. This submittal shall contain:

- a. Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information. Information submitted should consist of a package of those pages of the Offsite Dose Calculation Manual to be changed, together with appropriate analyses or evaluations justifying the change(s);
- b. A determination that the change will not reduce the accuracy or reliability of dose calculations or setpoint determinations; and
- c. Documentation of the fact that the change has been reviewed and found acceptable.



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ATTACHMENT B

NIAGARA MOHAWK POWER CORPORATION

LICENSE DPR-63

DOCKET NO. 50-220

Supporting Information and No Significant Hazards Considerations Analysis

The proposed changes to the fire protection technical specifications reflect:

1. Changes consistent with the Standard Technical Specifications.
2. Editorial changes.
3. Changes reflecting plant modifications.
4. Deviation from standard technical specifications which could cause an operational hazard.

Sections 3.6.6, 3.6.7, 3.6.8, 3.6.9, 3.6.10.2 and 3.6.10.3 were changed to incorporate additional flexibility as allowed by the standard technical specifications. This eliminates the need for an unnecessary fire watch or establishment of a backup system.

The requirement to submit a report in accordance with Section 6.9.2 is being deleted from Sections 3.6.6, 3.6.7, 3.6.8, 3.6.9 and 3.6.10 since backup measures are established and equipment will be returned to the operable status. Section 6.9.2 can, therefore, be deleted also.

The Bases to Sections 3.6.6 and 4.6.6 were updated to reflect additional areas of the plant for which fire protection was provided and the installation of two additional local fire panels.

The Bases for Sections 3.6.8 and 4.6.8 were changed to reflect an editorial change. The word "within" in the last sentence of the last paragraph was changed to "without."

Sections 3.6.10.1 and 4.6.10.1 were revised to include applicable wording from the standard technical specifications. Although the surveillance requirements were not currently in the Nine Mile Point Unit 1 specifications, surveillance procedures for fire barrier penetrations were in effect.

Section 4.6.10.2.a.2 was changed to reflect that new halon tanks can be determined full by measuring level.



10-1-78

ATTACHMENT B (cont'd)

Section 3.6.9.b with respect to fire hose stations was changed such that if a hose station became inoperable, an operation hazard would not be created by the routing of a fire hose.

10CFR50.91 requires that at the time a licensee requests an amendment, it must provide to the Commission its analysis, using the standards in 10CFR50.92, about the issue of no significant hazards consideration. Therefore, in accordance with 10CFR50.91 and 10CFR50.92, the following analysis has been performed.

The proposed amendment in accordance with the operation of Nine Mile Point Unit 1 will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed amendment incorporates changes in the fire protection system to reflect compliance with current NRC standard technical specifications and reflect additional fire protection equipment installed at Nine Mile Point Unit 1.

Therefore, the proposed amendment will not invoke a significant increase in the probability of consequences of an accident previously evaluated.

The proposed amendment in accordance with the operation of Nine Mile Point Unit 1 will not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes in the Nine Mile Point Unit 1 fire protection technical specifications would eliminate unnecessary fire patrol watches and circumstances which could result in operational hazards.

The proposed amendment in accordance with the operation of Nine Mile Point Unit 1 will not involve a significant reduction in a margin of safety.

The proposed amendment does not result in degradation in application of fire protection standards as related to their application at Nine Mile Point Unit 1.

As determined by the analysis above, this proposed amendment involves no significant hazards consideration.

