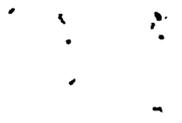


ENCLOSURE 1
PROPOSED TECHNICAL SPECIFICATION
BROWNS FERRY NUCLEAR PLANT
UNITS 1, 2 AND 3
(TVA BFN TS 292)

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3.11/4.11 FIRE PROTECTION SYSTEMS

LIMITING CONDITIONS FOR OPERATION

3.11.B FIRE PUMPS AND WATER DISTRIBUTION MAINS (Cont'd)

2. With only the diesel or one or more of the three electric pumps OPERABLE, restore the inoperable equipment to OPERABLE status within 7 days or provide an alternate backup pump or supply.
3. With no high-pressure fire pumps OPERABLE, establish a backup fire water system within 24 hours or be in COLD SHUTDOWN CONDITION within the following 24 hours.

SURVEILLANCE REQUIREMENTS

4.11.B FIRE PUMPS AND WATER DISTRIBUTION MAINS (Cont'd)

- e. At least yearly by cycling each testable valve in the flow path through at least one complete cycle of full travel.
- f. At least once per 18 months, by performing a system functional test which includes simulated actuation of the system throughout its operating sequence, and:
 - (1) Verifying that each automatic valve in the flow path actuates to its correct position,
 - (2) Verifying that each electric high-pressure fire pump develops at least 2100 gpm at a system head of 300 feet.
 - (3) Verifying the diesel-driven high-pressure fire pump develops at least 2100 gpm at a system head of 300 feet.

3.11/4.11 FIRE PROTECTION SYSTEMS

LIMITING CONDITIONS FOR OPERATION

3.11.B FIRE PUMPS AND WATER
DISTRIBUTION MAINS (Cont'd)

SURVEILLANCE REQUIREMENTS

4.11.B FIRE PUMPS AND WATER
DISTRIBUTION MAINS (Cont'd)

(4) Verifying that after initial high-pressure fire pump actuation each subsequent high-pressure fire pump starts sequentially to maintain the High-Pressure Fire Protection System pressure greater than or equal to 120 psig.

g. At least once per 3 years by performing a flow test of the system in accordance with the Fire Protection Handbook published by the National Fire Protection Association.

2. The diesel-driven high-pressure fire pump shall be demonstrated OPERABLE:

a. At least monthly by:

(1) Verifying the fuel tank contains at least 150 gallons of fuel.

(2) Starting the pump from ambient conditions and operating for greater than or equal to 30 minutes on recirculation flow.

3.11 BASES

FIRE PROTECTION SYSTEMS

The OPERABILITY of the fire protection systems ensures that adequate fire protection features are available to detect, confine, and extinguish fires occurring in any portion of the facility where safety-related equipment is located. The fire protection system consists of fire detection instrumentation, fire pumps, and water distribution mains, spray and/or sprinkler systems, CO₂ systems, fire hose stations, yard fire hydrants and hose house stations and fire barriers. The collective capability of the fire suppression systems is adequate to minimize potential damage to safety-related equipment and is a major element in the facility fire protection program. OPERABILITY of the detection instrumentation ensures that both adequate warning capability is available for prompt detection of fires and that fire suppression systems that are actuated by fire detectors will discharge extinguishing agent in a timely manner. Prompt detection and suppression of fires will reduce the potential for damage to safety-related equipment and is an integral element in the overall facility fire protection program.

In the event that portions of the fire protection systems are inoperable, alternate backup fire fighting equipment is required to be made available in the affected areas until the inoperable equipment is restored to service. When the inoperable fire fighting equipment is intended for use as a backup means of fire suppression, a longer period of time is allowed to provide an alternate means of fire fighting than if the inoperable equipment is the primary means of fire suppression.

If in the event that all the high-pressure fire pumps become inoperable, an alternate backup pump or supply is available, such as using the additional fire pump which normally protects outlying areas and mobile fire apparatus to maintain the 2100 gpm water supply at a system head of 300 feet.

Fire protection water systems protecting areas containing redundant safe shutdown systems, as defined in BFN's Fire Hazard Analysis, warrant more stringent compensatory measures (i.e., continuous fire watches) than areas containing only one division of safe shutdown systems or safety-related equipment not required for safe shutdown under fire conditions.

The surveillance requirements provide assurances that the minimum OPERABILITY requirements of the fire protection systems are met. All fire protection equipment surveillances required by this technical specification can be performed when the unit is in any operating mode.

3.11 BASES (Cont'd)

FIRE PROTECTION SYSTEMS (Cont'd)

Flushing of the high-pressure fire protection system mains and building headers assures that sediment and marine growth is removed from the system to prevent obstruction. Subsequent biocide addition reduces further marine organism growth. Individual hose stations and fire hydrants are not included in the overall flush requirements, but are flushed periodically during specific operability verifications. Hydraulic performance of the water fire suppression system is tested in accordance with the 16th Edition of the Fire Protection Handbook, published by the National Fire Protection Association.

The functional integrity of the fire barrier assemblies and penetration sealing devices ensures that fires will be confined or adequately retarded from spreading to adjacent portions of the facility. This design feature minimizes the possibility of a single fire from involving several areas of the facility prior to detection and extinguishment. The fire barrier penetrations are a passive element in the facility fire protection program and are subject to periodic inspections.

The barrier penetrations, including fire doors, fire dampers, and cable and pipe penetration seals, are considered functional when the visually observed condition indicates no significant degradation.

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*Denotes overleaf or spillover page.

LIMITING CONDITIONS FOR OPERATION

SURVEILLANCE REQUIREMENTS

3.11.B FIRE PUMPS AND WATER DISTRIBUTION MAINS (Cont'd)

2. With only the diesel or one or more of the three electric pumps OPERABLE, restore the inoperable equipment to OPERABLE status within 7 days or provide an alternate backup pump or supply.
3. With no high-pressure fire pumps OPERABLE, establish a backup fire water system within 24 hours or be in COLD SHUTDOWN CONDITION within the following 24 hours.

4.11.B FIRE PUMPS AND WATER DISTRIBUTION MAINS (Cont'd)

- e. At least yearly by cycling each testable valve in the flow path through at least one complete cycle of full travel.
- f. At least once per 18 months, by performing a system functional test which includes simulated actuation of the system throughout its operating sequence, and:
 - (1) Verifying that each automatic valve in the flow path actuates to its correct position,
 - (2) Verifying that each electric high-pressure fire pump develops at least 2100 gpm at a system head of 300 feet.
 - (3) Verifying the diesel-driven high-pressure fire pump develops at least 2100 gpm at a system head of 300 feet.

LIMITING CONDITIONS FOR OPERATION

SURVEILLANCE REQUIREMENTS

3.11.B FIRE PUMPS AND WATER DISTRIBUTION MAINS (Cont'd)

4.11.B FIRE PUMPS AND WATER DISTRIBUTION MAINS (Cont'd)

(4) Verifying that after initial high-pressure fire pump actuation each subsequent high-pressure fire pump starts sequentially to maintain the High-Pressure Fire Protection System pressure greater than or equal to 120 psig.

g. At least once per 3 years by performing a flow test of the system in accordance with the Fire Protection Handbook published by the National Fire Protection Association.

2. The diesel-driven high-pressure fire pump shall be demonstrated OPERABLE:

a. At least monthly by:

(1) Verifying the fuel tank contains at least 150 gallons of fuel.

(2) Starting the pump from ambient conditions and operating for greater than or equal to 30 minutes on recirculation flow.

3.11 BASES

FIRE PROTECTION SYSTEMS

The OPERABILITY of the fire protection systems ensures that adequate fire protection features are available to detect, confine, and extinguish fires occurring in any portion of the facility where safety-related equipment is located. The fire protection system consists of fire detection instrumentation, fire pumps, and water distribution mains, spray and/or sprinkler systems, CO₂ systems, fire hose stations, yard fire hydrants and hose house stations and fire barriers. The collective capability of the fire suppression systems is adequate to minimize potential damage to safety-related equipment and is a major element in the facility fire protection program. OPERABILITY of the detection instrumentation ensures that both adequate warning capability is available for prompt detection of fires and that fire suppression systems that are actuated by fire detectors will discharge extinguishing agent in a timely manner. Prompt detection and suppression of fires will reduce the potential for damage to safety-related equipment and is an integral element in the overall facility fire protection program.

In the event that portions of the fire protection systems are inoperable, alternate backup fire fighting equipment is required to be made available in the affected areas until the inoperable equipment is restored to service. When the inoperable fire fighting equipment is intended for use as a backup means of fire suppression, a longer period of time is allowed to provide an alternate means of fire fighting than if the inoperable equipment is the primary means of fire suppression.

If in the event that all the high-pressure fire pumps become inoperable, an alternate backup pump or supply is available, such as using the additional fire pump which normally protects outlying areas and mobile fire apparatus to maintain the 2100 gpm water supply at a system head of 300 feet.

Fire protection water systems protecting areas containing redundant safe shutdown systems, as defined in BFN's Fire Hazard Analysis, warrant more stringent compensatory measures (i.e., continuous fire watches) than areas containing only one division of safe shutdown systems or safety-related equipment not required for safe shutdown under fire conditions.

The surveillance requirements provide assurances that the minimum OPERABILITY requirements of the fire protection systems are met. All fire protection equipment surveillances required by this technical specification can be performed when the unit is in any operating mode.

3.11 BASES (Cont'd)

FIRE PROTECTION SYSTEMS (Cont'd)

Flushing of the high-pressure fire protection system mains and building headers assures that sediment and marine growth is removed from the system to prevent obstruction. Subsequent biocide addition reduces further marine organism growth. Individual hose stations and fire hydrants are not included in the overall flush requirements, but are flushed periodically during specific operability verifications. Hydraulic performance of the water fire suppression system is tested in accordance with the 16th Edition of the Fire Protection Handbook, published by the National Fire Protection Association.

The functional integrity of the fire barrier assemblies and penetration sealing devices ensures that fires will be confined or adequately retarded from spreading to adjacent portions of the facility. This design feature minimizes the possibility of a single fire from involving several areas of the facility prior to detection and extinguishment. The fire barrier penetrations are a passive element in the facility fire protection program and are subject to periodic inspections.

The barrier penetrations, including fire doors, fire dampers, and cable and pipe penetration seals, are considered functional when the visually observed condition indicates no significant degradation.

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*Denotes overleaf or spillover page.

3.11/4.11 FIRE PROTECTION SYSTEMS

LIMITING CONDITIONS FOR OPERATION

SURVEILLANCE REQUIREMENTS

3.11.B FIRE PUMPS AND WATER DISTRIBUTION MAINS (Cont'd)

2. With only the diesel or one or more of the three electric pumps OPERABLE, restore the inoperable equipment to OPERABLE status within 7 days or provide an alternate backup pump or supply.
3. With no high-pressure fire pumps OPERABLE, establish a backup fire water system within 24 hours or be in COLD SHUTDOWN CONDITION within the following 24 hours.

4.11.B FIRE PUMPS AND WATER DISTRIBUTION MAINS (Cont'd)

- e. At least yearly by cycling each testable valve in the flow path through at least one complete cycle of full travel.
- f. At least once per 18 months, by performing a system functional test which includes simulated actuation of the system throughout its operating sequence, and:
 - (1) Verifying that each automatic valve in the flow path actuates to its correct position,
 - (2) Verifying that each electric high-pressure fire pump develops at least 2100 gpm at a system head of 300 feet.
 - (3) Verifying the diesel-driven high-pressure fire pump develops at least 2100 gpm at a system head of 300 feet.

3.11/4.11 FIRE PROTECTION SYSTEMS

LIMITING CONDITIONS FOR OPERATION

3.11.B FIRE PUMPS AND WATER DISTRIBUTION MAINS (Cont'd)

SURVEILLANCE REQUIREMENTS

4.11.B FIRE PUMPS AND WATER DISTRIBUTION MAINS (Cont'd)

(4) Verifying that after initial high-pressure fire pump actuation each subsequent high-pressure fire pump starts sequentially to maintain the High-Pressure Fire Protection System pressure greater than or equal to 120 psig.

g. At least once per 3 years by performing a flow test of the system in accordance with the Fire Protection Handbook published by the National Fire Protection Association.

2. The diesel-driven high-pressure fire pump shall be demonstrated OPERABLE:

a. At least monthly by:

(1) Verifying the fuel tank contains at least 150 gallons of fuel.

(2) Starting the pump from ambient conditions and operating for greater than or equal to 30 minutes on recirculation flow.

3.11 BASES

FIRE PROTECTION SYSTEMS

The OPERABILITY of the fire protection systems ensures that adequate fire protection features are available to detect, confine, and extinguish fires occurring in any portion of the facility where safety-related equipment is located. The fire protection system consists of fire detection instrumentation, fire pumps, and water distribution mains, spray and/or sprinkler systems, CO₂ systems, fire hose stations, yard fire hydrants and hose house stations and fire barriers. The collective capability of the fire suppression systems is adequate to minimize potential damage to safety-related equipment and is a major element in the facility fire protection program. OPERABILITY of the detection instrumentation ensures that both adequate warning capability is available for prompt detection of fires and that fire suppression systems that are actuated by fire detectors will discharge extinguishing agent in a timely manner. Prompt detection and suppression of fires will reduce the potential for damage to safety-related equipment and is an integral element in the overall facility fire protection program.

In the event that portions of the fire protection systems are inoperable, alternate backup fire fighting equipment is required to be made available in the affected areas until the inoperable equipment is restored to service. When the inoperable fire fighting equipment is intended for use as a backup means of fire suppression, a longer period of time is allowed to provide an alternate means of fire fighting than if the inoperable equipment is the primary means of fire suppression.

If in the event that all the high-pressure fire pumps become inoperable, an alternate backup pump or supply is available, such as using the additional fire pump which normally protects outlying areas and mobile fire apparatus to maintain the 2100 gpm water supply at a system head of 300 feet.

Fire protection water systems protecting areas containing redundant safe shutdown systems, as defined in BFN's Fire Hazard Analysis, warrant more stringent compensatory measures (i.e., continuous fire watches) than areas containing only one division of safe shutdown systems or safety-related equipment not required for safe shutdown under fire conditions.

The surveillance requirements provide assurances that the minimum OPERABILITY requirements of the fire protection systems are met. All fire protection equipment surveillances required by this technical specification can be performed when the unit is in any operating mode.



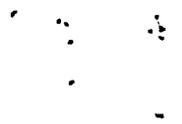
3.11 BASES (Cont'd)

FIRE PROTECTION SYSTEMS (Cont'd)

Flushing of the high-pressure fire protection system mains and building headers assures that sediment and marine growth is removed from the system to prevent obstruction. Subsequent biocide addition reduces further marine organism growth. Individual hose stations and fire hydrants are not included in the overall flush requirements, but are flushed periodically during specific operability verifications. Hydraulic performance of the water fire suppression system is tested in accordance with the 16th Edition of the Fire Protection Handbook, published by the National Fire Protection Association.

The functional integrity of the fire barrier assemblies and penetration sealing devices ensures that fires will be confined or adequately retarded from spreading to adjacent portions of the facility. This design feature minimizes the possibility of a single fire from involving several areas of the facility prior to detection and extinguishment. The fire barrier penetrations are a passive element in the facility fire protection program and are subject to periodic inspections.

The barrier penetrations, including fire doors, fire dampers, and cable and pipe penetration seals, are considered functional when the visually observed condition indicates no significant degradation.



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ENCLOSURE 2

SUMMARY OF CHANGES

1. Revise Surveillance Requirement (SR) 4.11.B.1.f (Fire Pumps and Water Distribution Mains).

a. Revise SR 4.11.B.1.f(2).

Existing SR 4.11.B.1.f(2) reads:

"(2) Verifying that each electric high-pressure fire pump develops at least 2500 gpm at a system head of 300 feet."

Revised SR 4.11.B.1.f(2) would read:

"(2) Verifying that each electric high-pressure fire pump develops at least 2100 gpm at a system head of 300 feet."

b. Revise SR 4.11.B.1.f(3).

Existing SR 4.11.B.1.f(3) reads:

"(3) Verifying the diesel-driven high-pressure fire pump develops at least 2500 gpm at a system head of 340 feet."

Revised SR 4.11.B.1.f(3) would read:

"(3) Verifying the diesel-driven high-pressure fire pump develops at least 2100 gpm at a system head of 300 feet."

2. Revise bases section 3.11 (Fire Protection Systems).

Existing bases section 3.11 reads in part:

". . . and mobile fire apparatus to maintain the 2500 gpm water supply capacity."

Revised bases section 3.11 would read in part:

". . . and mobile fire apparatus to maintain the 2100 gpm water supply at a system head of 300 feet."

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ENCLOSURE 3

REASON AND JUSTIFICATION FOR THE CHANGES

Reason for the Changes

The present Browns Ferry Nuclear Plant (BFN) technical specification surveillance requirements for the electric and diesel-driven high pressure fire pumps are based on a single data point on the manufacturer's laboratory performance curve and is not based on actual demand. Tests on the actual pumps installed have shown that in some cases they fall just short of achieving the technical specification value for flow at the specified head. The proposed change will revise the pump flow and head requirements based on actual demand requirements.

Justification for Changes

The objectives of the High Pressure Fire Protection System are to provide automatic fire protection for known hazardous areas, to provide adequate warning of fire in hazardous areas where automatic protection is not feasible, to provide adequate manually actuated fire protection systems for the entire plant and yard, and to ensure the capability to safely shutdown the reactor during and after a fire.

The present technical specification surveillance requirements for the electric and diesel-driven high pressure fire pumps relate to a single data point on the manufacturer's laboratory performance curve and is not based upon the actual BFN fire suppression water and raw service water (RSW) demand. The manufacturer's curve was not achieved using the motors presently installed on the pumps and duplication of this curve in the field is difficult.

TVA has performed a calculation to determine the actual fire pump flow/pressure requirements to meet the most demanding fire suppression water and RSW loads. BFN has a looped system so that multiple paths are available for water flow to a single point and multiple water sources are provided. A review of BFN water suppression hydraulic calculations for safety related areas was performed to determine the most demanding fire suppression water load (including 250 gpm for hose streams). A conservative, above normal RSW load was then added.

Allowance for pressure drop from the pump discharge to the suppression system was also made. The pressure drop from the pump discharge to the suppression system was calculated with the shortest portion of the fire loop main considered out of service. An operating point for the fire pump was selected which accounts for the system pressure drops in delivering the required flow with adequate margin. The calculation concluded that a fire pump developing 2100 gpm at a system head of 300 feet will adequately meet the fire suppression water and RSW loads. This requirement is applicable to both the electric and diesel-driven fire pumps.



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This value is applicable for Unit 2 operation and provides adequate fire protection for Unit 1 and Unit 3 while these units are shutdown and Unit 2 is operating. This is due to the fact that zonal separation in Unit 1 and Unit 3 is not needed nor taken credit for in the Unit 2 fire protection/safe shutdown analyses. Thus, potential flows/pressures which are slightly less than desirable in Units 1 and 3 due to combined preaction and spray systems discharging causes no safety concern. Modifications similar to those on Unit 2 are planned for Units 1 and 3 (e.g., upgrading sprinkler system and decommissioning spray system). It is expected that the value chosen for this TS change to cover Unit 2 operation will adequately cover Units 1 and 3 when they are in operation. The fire pump flow/pressure requirements for Units 1 and 3 will be reviewed and confirmed to be adequate prior to the restart of those units.

Technical specification surveillance requirements 4.11.B.1.f(2) and 4.11.B.1.f(3) and bases section 3.11 are being revised to incorporate this requirement (2100 gpm at a system head of 300 feet). Incorporation of these revised pump flow and head requirements will ensure an adequate supply of water is available to suppress a fire.



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ENCLOSURE 4

PROPOSED DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

BROWNS FERRY NUCLEAR PLANT (BFN)

Description of Proposed Technical Specification Change

The units 1, 2 and 3 technical specifications are being revised as follows.

1. Surveillance requirement 4.11.B.1.f(2) is being revised to incorporate the values for electric fire pump flow and head (2100 gpm at a system head of 300 feet) which are based on actual demand.
2. Surveillance requirement 4.11.B.1.f(3) is being revised to incorporate the values for diesel-driven fire pump flow and head (2100 gpm at a system head of 300 feet) which are based on actual demand.
3. Bases section 3.11 is being revised to note that in the event that all high-pressure fire pumps become inoperable, an alternate backup pump or supply is available to maintain the 2100 gpm water supply at a system head of 300 feet.

Basis for Proposed No Significant Hazards Consideration Determination

NRC has provided standards for determining whether a significant hazards consideration exists as stated in 10 CFR 50.92 (c). A proposed amendment to an operating license involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated, or (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety.

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The present BFN technical specification requirements for the electric and diesel-driven high pressure fire pumps [Surveillance Requirements 4.11.B.1.f(2) and 4.11.B.1.f(3)] are based on a single data point on the manufacturer's laboratory performance curve and are not based on actual demand. Tests on the pumps installed at BFN have shown that in some cases they fall just short of achieving the technical specification value for flow at the specified head. The proposed change will revise the pump flow and head requirements based on actual demand requirements.

TVA has performed a calculation to determine the actual fire pump flow/pressure requirements to meet the most demanding fire suppression water load and an above normal raw service water (RSW) load. The calculation concluded that a fire pump developing 2100 gpm at a system head of 300 feet will adequately meet the fire suppression water and RSW loads. This requirement is applicable to both the electric and diesel-driven fire pumps.



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This change will not involve an increase in the probability or consequences of a design basis event. It will ensure the fire protection system can supply sufficient water to suppress fires while not placing an overly restrictive surveillance requirement on the pumps.

2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change to pump flow and head requirements for the electric and diesel-driven high pressure fire pumps does not involve any modification to plant equipment. No new failure modes are introduced nor are any new system interactions introduced by the change. The methods and ability of the BFN fire protection system to suppress fires is unaffected by the change. Sufficient capability will still exist to suppress fires and to supply the necessary demands. Therefore, the change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed change does not involve a significant reduction in a margin of safety.

The current technical specification flow and head requirements for the electric and diesel-driven fire pumps are 2500 gpm at system heads of 300 and 340 feet respectively. The proposed change would revise the flow and head requirements for both the electric and diesel-driven fire pumps to 2100 gpm at a system head of 300 feet. The current technical specification values are based on a single data point on the manufacturer's laboratory performance curve and are not based on actual demand. The proposed values are based on a calculation of the actual demands that must be met for fire suppression water and RSW loads plus an additional margin. Although the fire pump surveillance flow requirements have been reduced, sufficient capacity still exists beyond the projected demands for fire suppression water and RSW. Thus, the margin of safety has not been reduced.

ENCLOSURE 5

LIST OF COMMITMENTS (TS 292)

The fire pump flow/pressure requirements for Units 1 and 3 will be reviewed and confirmed to be adequate prior to the startup of those units.

