

ATTACHMENT

Consumers Power Company
Palisades Plant
Docket 50-255

PROPOSED TECHNICAL SPECIFICATION CHANGE REQUEST
FIRE PROTECTION

Revision 1, dated November 21, 1985, to the entire
February 5, 1985 Inspection and Testing of Fire
Protection Devices and Assemblies Change Request
and to the Fire Protection portion of the
November 11, 1984 Change Request,
Control Room Habitability

November 21, 1985

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CONSUMERS POWER COMPANY
Docket 50-255
Request for Change to the Technical Specifications
License DPR-20

For the reasons hereinafter set forth, it is requested that the Technical Specifications contained in the Provisional Operating License DPR-20, Docket 50-255, issued to Consumers Power Company on October 16, 1972, for the Palisades Plant be changed as described in Section I below:

I. Changes

The attached revision of proposed changes to the Palisades Technical Specifications includes clarification of, deletions from and additions to the existing Technical Specifications 3.22 and 4.17. This revision supersedes the proposed changes to Technical Specifications 3.22 and 4.17 submitted on November 19, 1984 and February 5, 1985. These revisions of previously proposed changes to the Technical Specifications are the result of (1) a July 1, 1985 telephone conversation with an NRC staff representative, during which recommendations to modify the proposed fire protection Technical Specifications to bring them into closer alignment with the Standard Technical Specifications were made; (2) fire protection modifications and clarifications resulting from compliance with 10CFR50.48 and Appendix R; and, (3) the addition of fire protection equipment as part of the Control Room/Technical Support Center HVAC system modifications and the associated Auxiliary Building Addition. Proposed changes are identified by a vertical line in the right-hand margin. The following are brief descriptions of the proposed changes.

Specification 3.22.1.1. - Clarifies statement to read "The minimum fire detection instrumentation ...," deletes the reporting requirements, increases the time interval before hourly fire watch patrols are initiated when a fire detector becomes inoperable; and, includes specific action when detectors inside containment become inoperable.

Specification 3.22, Table 3.22.1 - The first item has been clarified to include a better description of the zone affected by the detector.

Specification 3.22, Table 3.22.1 - The second item has been expanded to show fire protection zones along with appropriate number and type of detection instrumentation in that zone. (New items No. 2-5, Old Item 2)

Specification 3.22, Table 3.22.1 - Clarified item in table pertaining to fire protection zone "Turbine Building 590' Col H-9" To read: "Southwest Cable penetration, Col H-10" (New Item 9, Old item 5)

Specification 3.22, Table 3.22.1 - New detectors have been added under items 5, 6, 10, 11, 32, 33, 34 and 35. The numbering for Table 3.22.1 has been revised accordingly.

Specification 3.22.2.1 - Statement clarified to specify the diesel fire pump south of the fire barrier as this is the only fire pump that would remain operable in the event of a fire in Room 136 which causes the other fire pumps and Service Water Pumps to become inoperable. The Action statement has been modified to conform to Standard Technical Specifications and superfluous reporting requirements have been deleted. The Basis for LCO 3.22.2 has been revised to reflect the proposed requirements.

Specification 3.22.3.1 - Item "a" has been clarified to state "Cable Spreading Room/Switchgear Room 1C." New items "h", "i", and "j" have been added to address sprinkler systems in the North Cable Penetration Room, the Electrical Equipment Room, and the Charging Pump Room. The ACTION statement has been re-stated to conform with Standard Technical Specifications.

Specification 3.22.4.1 - Outside Fire Hose Station #5 was added as item "j". Previously existing items "j" and "k" have been given new alpha characters to maintain consistency of hose station listings. The change in the alpha characters has also been reflected in items "1" and "2" of the ACTION statement, and the ACTION statement has been modified to conform with Standard Technical Specifications.

Specification 3.22.5 - This specification was totally revised to include all fire rated assemblies and fire protection assemblies along with penetration sealing devices.

Specification 4.17.4.1 and 4.17.4.2 - Corrects alpha characters for consistency with Specification 3.22.4.1 and changes hose testing pressure test criteria to conform with Standard Technical Specifications.

Specification 4.17.5.1 and 4.17.5.2 - New surveillance requirements are outlined reflecting the proposed revision to Specification 3.22.5.

II. Discussion

These proposed Technical Specifications changes are requested in order to reflect the existing fire protection practices and equipment at the Palisades Plant. The specific reasons for each proposed change are discussed below.

Since the charging pumps are important to safe shutdown, the Fire Suppression System for the Charging Pump Rooms must be operable. Consequently, this system was added to Specification 3.22.3 and to Specification 3.22, Table 3.22.1.

According to 10CFR50.48, which endorses Branch Technical Position 9.5-1, Specifications 3.22.5 and 4.17 were revised to include all fire related assemblies. This requirement was combined with the necessity for including fire protection assemblies (radiant heat shields) in the Technical Specifications. These additions result in an LCO that more accurately reflects the fire protection surveillance programs presently in effect at Palisades.

Changes to the 3.22.1.1 added an ACTION statement in the event of inoperable fire detectors inside containment. Reporting requirements in 3.22.1.1, 3.22.2.1, and 3.22.3.1 were eliminated in view of the fact that reporting requirements are now delineated in 10CFR50.72 and 50.73.

The diesel fire pump south of the fire barrier in room 136 (the traveling Screen Room) is essential for safe shutdown in the event of a postulated fire wherein all other equipment in that room is rendered inoperable and offsite power is lost. Specification 3.22.2 has been modified in consideration of that condition.

The test criteria of Specifications 4.17.4.1.c.(2) and 4.17.4.2.c.(2) were increased to require testing at 50 psi above the maximum fire main operating pressure. This change aligns the requirement with the Standard Technical Specifications requirement.

The remaining changes in fire detection instrumentation, fire sprinkler systems and fire hose stations result from the physical additions to the Auxiliary Building which were completed to facilitate the Control Room Emergency Air Cleanup System.

Analysis of No Significant Hazards Consideration

Consumers Power Company (CPC) presents this evaluation of the hazards considerations involved with the proposed amendment, focusing on the three conditions set forth in 10CFR50.92(c) as quoted below:

"The Commission may make a final determination, pursuant to the procedures in §50.91, that a proposed amendment to an operating license for a facility licensed under §50.21(b) or §50.22 or for a testing facility involves no significant hazards considerations, if it finds that 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."

CPC concludes that the activities associated with this amendment request do not meet any of the significant hazards consideration standards of 10CFR50.92(c); and, accordingly, a no significant hazards consideration finding is justified. In support of this determination, the following analysis is provided.

Analysis

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated.

Changes to Table 3.22.1 and Specifications 3.22.1.1 Action Item 2, 3.22.2, 3.22.3, 3.22.4, 3.22.5, 4.17.4.1, 4.17.4.2, 4.17.5.1 and 4.17.5.2 add fire suppression equipment and/or fire rated assemblies or require more fire suppression equipment and fire rated assemblies to be operable, add an LCO, increase surveillance criteria, or delete redundant reporting procedures. For example:

- a. Specification 3.22.1.1 ACTION statement #2 requires that the zone, or the zone above it inside containment, that contains less than the required number of operable detectors listed in Table 3.22.1 be observed on an hourly basis with the TV camera. Previously, no action for an inoperable detector inside containment was specified.
- b. Specification 3.22.3.1 adds three sprinkler systems to the list of sprinkler systems which are required to be operable.
- c. Specification 4.17.4.1.c.2 requires testing at 50 psi greater than maximum fire main pressure instead of 50 psi greater than maximum pressure at the fire hose station.
- d. Deleting the requirement to file a Special Report, as required by existing Specification 3.22.1.1 ACTION statement #4, when the number of operable fire detectors is less than that number listed in Table 3.22.1 does not increase the probability or consequences of an accident previously evaluated as reports of this nature are now made in accordance with 10CFR250.72 and 10CFR50.73.

The addition of fire detectors, fire rated assemblies, fire suppression equipment and systems, increasing the observation of areas, increasing the test pressure of hose stations, and deleting a redundant reporting requirement does not involve a significant increase in the probability or consequences of an accident previously evaluated. With the possible exception of the deletion of the duplicate reporting requirements, all of the above listed changes decrease the probability of or consequences of accidents previously evaluated.

The change to Specification 3.22.1.1, ACTION statement #1, is the only other change which may increase the probability or consequences of a previously evaluated accident. By increasing the allowed time to initiate hourly fire patrols, once an inoperable detector is identified, to 25 hours, instead of the existing one hour requirement, this Technical Specification is aligned with the Standard Technical Specification. The probability of a fire occurring in any given twenty-five hour period is considered extremely low. Furthermore, it is reasonable to expect increased

operator attention to an area containing one or more inoperable fire detectors during the 25 hour period before an hourly fire patrol is initiated. Therefore, CPC has concluded that the proposed change to Specification 3.22.1.1, ACTION statement #1 does not significantly increase the probability or consequences of an accident previously evaluated.

- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated.

This proposed change, with the exception of ACTION statement #1 of Specification 3.22.1.1, only adds to the amount of fire protection equipment, increases surveillance criteria, or deletes redundant reporting requirements. All additional equipment is of proven design and does not increase the possibility of a new or different kind of accident. The proposed changes increase the level of fire protection and would not create the possibility of a new or different kind of accident from any accident previously analyzed.

The proposed change to Specification 3.22.1.1, does increase the time which may elapse between the time a required fire detector becomes inoperable and the time, if the detector is not restored to operable status, an hourly fire watch must be initiated. The increased allowed time allowance, from one hour to 25 hours, aligns the Palisades Technical Specifications with the Standard Technical Specifications and does not create the possibility of a new or different kind of accident from any accident previously evaluated. Fires are the type of accident under consideration and the possibility of fires has been evaluated in all the areas of the plant.

- (3) Involve a significant reduction in the margin of safety.

This proposed change with the exception of ACTION statement #1 of Specification 3.22.1.1, adds to the margin of safety by increasing the amount of fire protection equipment to which Technical Specification requirements are applied, upgrades surveillance criteria, or deletes redundant reporting requirements. For example:

Deleting the requirement to file a Special Report, as required by the existing Specification 3.22.3 after a sprinkler system is inoperable for more than 14 days, does not involve a significant reduction in the margin of safety. Adequate reporting requirements exist in 10CFR50.72 and 50.73.

The proposed change to Technical Specification 3.22.1.1 ACTION statement #1 does increase to 25 hours the allowable time between the time a detector becomes inoperable and the time at which an hourly fire patrol must be initiated. Existing Technical Specifications state the hourly fire watch patrol must be initiated within one hour when the number of operable detectors in a zone is less than that number required by Table 3.22.1. In most cases, referring to Table 3.22.1, if a zone has multiple detectors, more than one detector must be inoperable before a fire watch patrol is

required. Plant administrative controls require the fire watch patrol to be initiated within one hour after any fire detector becomes inoperable, resulting in additional attention paid to a zone with an inoperable detector. This proposed change may reduce the margin of safety when compared to the existing Technical Specification, however, the amount of reduction is considered to be insignificant. None of the fire detectors required to be operable by Table 3.22.1 actuate fire suppression systems.

III. Conclusion

The Palisades Plant Review Committee has reviewed this Technical Specification Change Request and has determined that this change does not involve an unreviewed safety question. However, we have determined that this change does not involve a significant hazards consideration. This change has also been reviewed under the cognizance of the Nuclear Safety Board. A copy of this Technical Specification Change Request has been sent to the State of Michigan official designated to receive such Amendments to the Operating License.

CONSUMERS POWER COMPANY

By *R B DeWitt*
R B DeWitt, Vice President
Nuclear Operations

Sworn and subscribed to before me this 21st day of November 1985.

Helen I Dempski
Helen I Dempski, Notary Public
Jackson County, Michigan
My commission expires October 12, 1987.

