

2. Fire Protection Program Changes that Have No More than Minimal Risk Impact

Prior NRC review and approval are not required for changes to the licensee's fire protection program that have been demonstrated to have no more than a minimal risk impact. The licensee may use its screening process as approved in the NRC SE dated January 22, 2018, to determine that certain fire protection program changes meet the minimal criterion. The licensee shall ensure that fire protection defense-in-depth and safety margins are maintained when changes are made to the fire protection program.

(c) Transition License Conditions

1. Before achieving full compliance with 10 CFR 50.48(c), as specified by (2) below, risk-informed changes to the licensee's fire protection program may not be made without prior NRC review and approval unless the change has been demonstrated to have no more than a minimal risk impact, as described in (2) above.
2. The licensee shall implement the Unit 1 modifications to its facility, as described in Attachment S, Table S-2, "Plant Modifications Committed," in FENOC letter L-17-122, dated April 21, 2017, to complete the transition to full compliance with 10 CFR 50.48(c), by the completion of the second Unit 1 refueling outage after issuance of the safety evaluation. The licensee shall maintain appropriate compensatory measures in place until completion of these modifications.
3. The licensee shall implement the items listed in Attachment S, Table S-3, "Implementation Items," of FENOC letter L-17-268, dated August 22, 2017, by 12 months after issuance of the safety evaluation (with the exception of Items BV1-1633, BV1-2974, BV1-3060, BV1-3108, BV1-3109, BV2-1580, BV2-1622, BV2-1623, and BV2-1750, which are to be completed by the end of the second **Unit 1** refueling outage after issuance of the safety evaluation).

(6) Systems Integrity

FENOC shall implement a program to reduce leakage from systems outside containment that would or could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. This program shall include the following:

1. Provisions establishing preventive maintenance and periodic visual inspection requirements, and
2. Integrated leak test requirements for each system at a frequency not to exceed refueling cycle intervals.