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BASES

TRO

The OPERABILITY of the fire suppression Halon systems is one part of ensuring that adequate fire suppression capability is available to confine and extinguish fires occurring in any portion of the facility where safety related equipment is located. The fire suppression system consists of the water supply system, spray and sprinkler systems, C0₂ systems, Halon systems, fire hose stations, and fire hydrants. 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.

An OPERABLE Halon system will have storage tanks with at least 95% of full charge weight and 90% of full charge pressure.

Any time a Power Generation Control Complex (PGCC) panel drawer is removed, the opening must be covered with a blank to keep the Halon System OPERABLE. Removal of any PGCC Floor panel or opening of any PGCC panel door causes the affected PGCC module Halon system to become inoperable if the floor panel or panel door must be left open and unattended or cannot be immediately closed.

The basis for those systems included within the scope of this TRO includes both Safety Related and Safe Shutdown system protection. The Halon systems are described in FPRR.

ACTIONS

The Actions are defined to ensure proper corrective measures and compensatory actions are taken in response to the inoperable systems or components.

Hourly Firewatch Patrols shall be completed once each clock hour. Individual zones on the hourly firewatch patrol shall be toured at intervals (i.e. - zone A and back to zone A) of sixty minutes with a margin of fifteen minutes.

A Continuous Firewatch must remain in the specified area at all times and must patrol the required fire zones in the specified area at least once per fifteen minutes with a margin of five minutes. Areas exist within the plant where the posting of a firewatch does not provide acceptable radiological ALARA practices. For these inaccessible areas, alternate measures should be taken to assure an adequate level of fire protection is maintained.

(continued)

BASES

ACTIONS (continued)

The specified area can be as small as one fire zone or as large as a firewatch can reasonably patrol within the fifteen minute time period. The specified area is limited to two floors of the Control Structure or Reactor Buildings. The floors must be adjacent or served by an operable elevator.

TRS

The TRSs provide assurances that the minimum OPERABILITY requirements of the fire suppression Halon systems are met. An allowance is made for ensuring a sufficient volume of Halon in the Halon storage tanks by verifying the weight and pressure of the tanks. Tank level measurement may be used to confirm full charge weight when supported by engineering analysis.

The Surveillances are modified by a Note to indicate that when a system is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 1 hour. Upon completion of the test, or expiration of the 1 hour allowance, the system must be restored to an operable condition, or the applicable Condition entered and 1 hour Required Action(s) completed. The 1 hour allowance is a reasonable out of service time based on prior plant test performance. This allowance also does not result in an increased risk of a fire. Required Surveillances include those surveillances under other subsections of TRM 3.7.3.

TRS 3.7.3.4.3

The purpose of the flow test is to verify that there are no obstructions / blockages in the Halon system headers or nozzles. The use of air or nitrogen is acceptable for use in the performance of the flow test.

REFERENCES

1. FPRR Section 4.9