GULF STATES UTILITIES COMPANY

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June 6, 1990
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U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555

Gentlemen:

River Bend Station - Unit 1
Docket No. 50-458

Gulf States Utilities Company (GSU) hereby files an application to amend the River Bend Station - Unit 1 Technical Specifications, Appendix A to Facility Operating License NPF-47, pursuant to 10CFR50.90. This application is filed to revise Table 3/4.3.7.8-1, "Fire Detection Instrumentation." This change adds an additional smoke detector to the table due to the proposed addition of a suspended ceiling to the control rod drive maintenance rebuild facility. To support the completion of the rebuild facility, for use during the third refueling outage, approval of this License Amendment is requested prior to August 31, 1990. The attachment to this letter and the enclosure provide the justifications and proposed revisions to the Technical Specifications, respectively.

Your prompt attention to this application is appreciated.

Sincerely,

W. H. Odell
Manager - Oversight
River Bend Nuclear Group

TFP/TAE/LLD/MSF/pg

Attachment

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cc: U. S. Nuclear Regulatory Commission
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UNITED STATES OF AMERICA
NUCLFAR REGULATORY COMMISSION

STATE OF LOUISIANA)
PARISH OF WEST FELICIANA)
In the Matter of) Docket No. 50-458
GULF STATES UTILITIES COMPANY)
(River Bend Station - Unit 1)

AFFIDAVIT

W. H. Odell, being duly sworn, states that he is a Manager - Oversight for Gulf States Utilities Company; that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission the documents attached hereto; and that all such documents are true and correct to the best of his knowledge, information and belief.

W. H. Odell

Subscribed and sworn to before me, a Notary Public in and for the State and Parish above named, this 6th day of June, 1990. My Commission expires with Life.

Claudia F. Hurst
Notary Public in and for
West Feliciana Parish, Louisiana

ATTACHMENT

Gulf States Utilities Company
River Bend Station
Docket 50-458/License No. NPF-47

Technical Specifications/Surveillance Requirements

Licensing Document Involved:

A change to the RBS Technical Specification is requested by this License Amendment Request. The affected Technical Specification (TS) section is:

Instrumentation - Fire Detection Instrumentation
3/4.3.7.8

The specific section to be revised is:

Table 3.3.7.8-1 (P. 3/4 3-90)

Reason For Request:

This proposed change is being requested in accordance with operating license NPF-47, section 2.C.10 and pursuant to 10CFR50.90. A change to the "Total Instruments Operable" contained in TS section 3/4.3.7.8 is requested. This change adds one ionization type fire detector to Zone SD-100 located in the Auxiliary Building - General Area West, EL. 95'- 9" (Limiting Condition For Operation Table 3.3.7.8-1).

This change is requested in order to maintain compliance with requirements of 10CFR50 Appendix R to provide early warning for fire in areas that contain or present an exposure fire hazard to safe shutdown or safety-related systems or components.

During maintenance on CRD's, there is a strong possibility that the work area will become contaminated with airborne contamination. The CRD maintenance area will be enclosed utilizing a suspended ceiling for ALARA considerations to limit the spread of contamination, facilitate cleanup and better control air movement within this work area. The existing room has a fire detector installed in the ceiling, automatic suppression will be provided over combustibles and a new fire detector will be installed within the same detector zone and located below the planned suspended ceiling.

Approval of this change is required prior to complete CRD maintenance area closure installation scheduled for the third refueling outage.

Description:

Discussion of the regulatory basis and a detailed description of the proposed change is given below.

Regulatory Basis:

10CFR50, Appendix R, section III.F requires automatic fire detection systems be installed in all areas of the plant that contain or present an exposure fire hazard to safe shutdown or safety related systems or components. In accordance with this requirement, detection is presently provided in the ceiling of the CRD maintenance room since the room contains safe shutdown/safety-related components. Detailed design guidelines for the detection system is found in Branch Technical Position (BTP) CMEB 9.5-1 Section C.6.a. In SER dated 5/84 the staff stated "On the basis of its review, the staff concludes that the fire detection systems meet the guidelines in section C.6.a of BTP CMEB 9.5-1, and are, therefore, acceptable".

Guidelines in BTP CMEB 9.5-1 section C.5.a.11 state: "Suspended ceiling and their supports should be of noncombustible construction. Concealed spaces should be devoid of combustibles except as noted in Position C.6.b." Appendix A to BTP CMEB 9.5-1 section D.1.f specifically addresses suspended ceilings and concealed space guidelines as noted in BTP 9.5-1 section C.5.a.11 and states: "Adequate fire detection and suppression systems should be provided where full implementation is not practical". In SER dated 5/84, second paragraph page 9-41, the staff stated: "Suspended ceilings and their supports are of noncombustible materials, and concealed spaces are devoid of combustibles. The staff finds this to be in accordance with the guidelines of BTP CMEB 9.5-1, Sections C.5.1(10) and (11), and, therefore, acceptable.".

Installation of the metal noncombustible suspended ceiling in the CRD maintenance room will create a concealed space with combustibles. Combustibles consist of IEEE 383 rated electrical cables in open cable trays. In accordance with the guidelines above, the existing fire detection will remain, automatic suppression, wet pipe sprinklers, will be provided over all combustibles and will be fed from an existing sprinkler system (AS-12). A new fire detector will be installed below the suspended ceiling and tied into the existing room detection circuit. Since all RBS design requirements are being maintained and the change is consistent with regulatory and design bases, the safety of the plant is not degraded.

Description of Change:

Automatic fire detection is provided in the CRD rebuild room in accordance with the guidelines stated above since the room contains safe shutdown/safety-related components. With the addition of fire detection below the suspended ceiling, suppression over combustibles, and fire detection above the suspended ceiling, conformance with the above guidelines is maintained and the level of safety will not be lowered. The specific change to the TS is described below.

a. Table 3.3.7.8-1 (page 3/4 3-90) - The total number of detectors, listed in zone SD-100 (General Area West, EL. 95'- 9") for "early warning fire detection and notification only", are two (2). One of these detectors is the detector located in the ceiling of the

CRD rebuild room. The proposed change would add an additional detector below the planned suspended ceiling in the CRD rebuild room, providing two detectors in this area (one above and one below the suspended ceiling), and increasing the total number of fire detectors on this zone to three (3).

No Significant Hazard Considerations:

The following discussion is provided to the NRC in support of "no significant hazards" per 10CFR50.92. The item being changed by this license amendment request is used as limiting conditions of operation and as surveillance requirements. The fire detection instrumentation for each fire detection zone shown in TS Table 3.3.7.8-1 is required to be operable whenever equipment protected by the fire detection instrument is required to be operable.

The revised fire detection instrumentation table is more conservative since two (2) detectors, in the same room, are required to be operable instead of only one (1). Operation of RBS in accordance with the change proposed in this amendment involves no significant hazards based upon the evaluations given below.

a. The change made in this request is in accordance with the applicable design, material, and construction standards and regulatory requirements. The revision is the result of adding an additional fire detector below the planned suspended ceiling in a room which presently has one fire detector located in the ceiling of that room. The change results in more conservative limits (two detectors required as opposed to one) for fire detection in this room. Consequently, no significant increase in the probability or the consequences of an accident previously evaluated results from this change.

b. Since this change simply adds an additional detector (identical in all respects to the existing detector) below a planned suspended ceiling in a room which presently has a detector located in the ceiling of that room, the possibility of a new or different kind of accident from that previously evaluated is not introduced as a result of this change. This change provides more conservative limits for fire detection and no limits are removed or made less conservative. Therefore, this change would not create the possibility of a new or different kind of accident from any accident previously evaluated.

c. The larger number of fire detectors in the same area equates to each detector protecting an area with less volume. Consequently, the revised number of detectors to be used for RBS TS 3/4.3.7.8 is more conservative. Thus, additional margin is provided to assure that when a fire does occur, it will be detected early. Therefore, this change would not involve a significant reduction in margin of safety.

The proposed amendment will not increase the possibility or the consequences of a previously evaluated event and will not create a new or different kind of accident from any previously evaluated. Also, this proposed change is clearly within all acceptance criteria with respect to system components and design requirements. The ability of the fire detection system to perform as described in the USAR is maintained and

therefore, the proposed change does not involve a significant reduction in margin of safety. GSU proposes that no significant hazards are involved for these changes.

Revised Technical Specification:

A marked-up page of RBS TS 3/4.3.7.8 is provided in the Enclosure.

Schedule For Attaining Compliance:

River Bend Station is currently in compliance with the applicable Technical Specifications. MR 89-0230 (CRD Rebuild Facility Upgrade) is to be completed in the third refueling outage scheduled for September, 1990.

Approval of this change is required prior to CRD Maintenance Area Ceiling Installation scheduled to begin August 31, 1990.

Notification of State Personnel:

A copy of this amendment request has been provided to the State of Louisiana, Department of Environmental Quality - Nuclear Energy Division.

Environmental Impact Appraisal:

Gulf States Utilities Company (GSU) has reviewed the proposed license amendment request against the criteria of 10CFR51.22 for environmental considerations. The proposed changes do not involve a significant hazards consideration, nor increase the types and amounts of effluents that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, GSU concludes that the proposed change meets the criteria given in 10CFR51.22(c)(9) for a categorical exclusion from the requirement for an Environmental Impact Statement.