



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 81 TO FACILITY OPERATING LICENSE NPF-35  
AND AMENDMENT NO. 75 TO FACILITY OPERATING LICENSE NPF-52

DUKE POWER COMPANY, ET AL.

CATAWBA NUCLEAR STATION, UNITS 1 AND 2

DOCKET NOS. 50-413 AND 50-414

1.0 INTRODUCTION

By letter dated March 13, 1990, as supplemented May 4, 1990, Duke Power Company, et al. (the licensee) proposed changes to the Appendix A Technical Specifications (TSs) for Catawba Nuclear Station, Units 1 and 2. The proposed changes would remove requirements for fire detection systems, fire suppression systems, fire barriers, and fire brigade staffing as recommended by Generic Letter 86-10. The proposed changes would also modify the administrative control requirements of the TSs to add requirements for the Fire Protection Program. Guidance on these proposed changes to the TSs was provided to all power reactor licensees and applicants by Generic Letter 88-12 dated August 2, 1988.

Specifically, the proposed changes would delete TS 3/4.3.3.8, referenced TS Table 3.3-11 and corresponding Bases, each titled "Fire Protection Instrumentation;" TS 3/4.7.10, "Fire Suppression Systems," including all subsections, referenced TS Table 3.7-3, "Fire Hose Stations," and associated Bases; TS 3/4.7.11, "Fire Barrier Penetrations," and its corresponding Bases; and TS 6.2.2e, which addresses staffing requirements for the site Fire Brigade. Additionally, reference to the "Fire Brigade" composition within the footnote referenced by TS 6.2.2e, would be removed. The TS Index would be revised to reflect these deletions.

The proposed amendments would supplement the administrative controls requirements of TS 6.5.1, "Review and Audit/Technical Review and Control Activities," to require that the Station Manager ensure the performance of a review by a qualified individual/organization of the Fire Protection Program and implementing procedures and submittal of recommended changes to the Nuclear Safety Review Board. The amendments would also supplement TS 6.8.1, "Procedures and Programs," to add the following to the existing activities requiring written procedures: "h. Fire Protection Program implementation" and "i. Commitments contained in FSAR Chapter 16.0."

The standard fire protection license conditions have been implemented for both Catawba Units 1 and 2. For Unit 1, it was implemented by the issuance of Amendment 57 on January 3, 1989, to Facility Operating License NPF-35. The Unit 2 license, NPF-52 issued May 15, 1986, included License Condition 2.C.(6) on the fire protection program.

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## 2.0 BACKGROUND

Following the fire at the Browns Ferry Nuclear Power Plant on March 22, 1975, the Commission undertook a number of actions to ensure that improvements were implemented in the Fire Protection Programs for all power reactor facilities. Because of the extensive modification of Fire Protection Programs and the number of open issues resulting from staff evaluations, a number of revisions and alterations occurred in these programs over the years. Consequently, licensees were requested by Generic Letter 86-10 to incorporate the final NRC-approved Fire Protection Program in their Final Safety Analysis Reports (FSARs). In this manner, the Fire Protection Program--including the systems, the administrative and technical controls, the organization, and other plant features associated with fire protection--would have a status consistent with that of other plant features described in the FSAR. In addition, the Commission concluded that a standard license condition, requiring compliance with the provisions of the Fire Protection Program as described in the FSAR, should be used to ensure uniform enforcement of fire protection requirements. Finally, the Commission stated that with the requested actions, licensees may request an amendment to delete the fire protection TSs that would now be unnecessary.

The licensees for the Callaway and Wolf Creek plants submitted lead-plant proposals to remove fire protection requirements from their TSs. This action was an industry effort to obtain NRC guidance on an acceptable format for license amendment requests to remove fire protection requirements from TSs. Additionally, in the licensing review of new plants, the NRC staff has approved applicant requests to remove fire protection requirements for TSs issued with the operating license. Thus, on the basis of the lead-plant proposals and the staff's experience with TSs for new licenses, Generic Letter 88-12 was issued to provide guidance on removing fire protection requirements from TSs.

## 3.0 EVALUATION

Generic Letter 86-10 recommended the removal of fire protection requirements from the TSs. Although a comprehensive Fire Protection Program is essential to plant safety, the basis for this recommendation is that many details of this program that are currently addressed in TSs can be modified without affecting nuclear safety. Such modifications can be made provided that there are suitable administrative controls over these changes. These details, that are presently included in TSs and which are removed by these amendments, do not constitute performance requirements necessary to ensure safe operation of the facility and, therefore, do not warrant being included in TSs. At the same time, suitable administrative controls ensure that there will be careful review and analysis by competent individuals of any changes in the Fire Protection Program, including those technical and administrative requirements removed from the TSs to ensure that nuclear safety is not adversely affected. These controls include: (1) the TS administrative controls that are applicable to the Fire Protection Program; (2) the license condition on implementation of, and subsequent changes to, the Fire Protection Program; and (3) the 10 CFR 50.59 criteria for evaluating changes to the Fire Protection Program as described in the FSAR.

The specific details relating to fire protection requirements removed from TSs by these amendments include those specifications for fire detection systems, fire suppression systems, fire barriers, and fire brigade staffing requirements. The administrative control requirements have been modified to include Fire Protection Program implementation as an element for which written procedures must be established, implemented, and maintained.

As required by Generic Letter 86-10, the licensee confirmed that the NRC-approved Fire Protection Program will be incorporated into the FSAR. The current license condition on fire protection is the standard condition provided in Generic Letter 86-10.

The licensee also confirmed that the operational conditions, remedial actions, and test requirements associated with the removed fire protection TSs will be included in the Fire Protection Program and incorporated into the next update of FSAR Chapter 16.0. Any changes to the previous fire protection TS requirements will be made in accordance with the license condition on the fire protection program. This is in accordance with the guidance of Generic Letter 88-12.

On the basis of its review of the above items, the NRC staff concludes that the licensee has met the guidance of Generic Letter 88-12. Therefore, the staff finds the proposed changes acceptable.

#### 4.0 ENVIRONMENTAL CONSIDERATION

These amendments involve changes in requirements with respect to the use of facility components located within the restricted area as defined in 10 CFR Part 20 and changes in surveillance requirements. The amendments also relate to recordkeeping, reporting, or administrative procedures or requirements. The staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and (10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of these amendments.

#### 5.0 CONCLUSION

The Commission's proposed determination that the amendments involve no significant hazards consideration was published in the Federal Register (55 FR 34367) on August 22, 1990. The Commission consulted with the State of South Carolina. No public comments were received, and the State of South Carolina did not have any comments.

We have concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and the issuance of these amendments will not be inimical to the common defense and security or to the health and safety of the public.

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Dated: November 30, 1990