

ENCLOSURE 1

SEQUOYAH NUCLEAR PLANT
UNITS 1 AND 2

PROPOSED TECHNICAL SPECIFICATION

DELETION OF CABLE SPREADING ROOM FROM THE
CO₂ SYSTEM LIMITING CONDITION FOR OPERATION

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PLANT SYSTEMS

CO₂ SYSTEMS

LIMITING CONDITION FOR OPERATION

3.7.11.3 The following low pressure CO₂ systems shall be OPERABLE.

- a. Computer Room.
- b. Auxiliary Instrument Room.
- c. Diesel Generator Rooms.
- d. Fuel Oil Pump Rooms.

APPLICABILITY: Whenever equipment protected by the CO₂ systems is required to be OPERABLE.

ACTION:

- a. With one or more of the above required CO₂ systems inoperable, within one hour establish a continuous fire watch with backup fire suppression equipment for those areas in which redundant systems or components could be damaged; for other areas, establish an hourly fire watch patrol. Restore the system to OPERABLE status within 14 days or, in lieu of any other report required by Specification 6.9.1, prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 30 days outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.11.3.1 Each of the above required CO₂ systems shall be demonstrated OPERABLE at least once per 31 days by verifying that each valve (manual, power operated or automatic) in the flow path is in its correct position.

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4.7.11.3.2 Each of the above required low pressure CO₂ systems shall be demonstrated OPERABLE:

- a. At least once per 7 days by verifying the CO₂ storage tank level to be greater than 50% and pressure to be greater than 270 psig, and
- b. At least once per 18 months by verifying:
 1. The system valves and associated ventilation dampers and fire door release mechanisms actuate manually and automatically, upon receipt of a simulated actuation signal, and
 2. Flow from each nozzle during a "Puff Test."

ENCLOSURE 2

JUSTIFICATION FOR PROPOSED TECHNICAL SPECIFICATION

This proposed change deletes the cable spreading room from the limiting condition for operation from TS 3.7.11.3. Present procedures require disabling of the cable spreading room CO₂ system each time work is performed from scaffolding in the cable spreading room. This is necessary because the CO₂ system represents a safety/health hazard if accidentally actuated.

The primary source of fire protection in the cable spreading room is provided by the preaction sprinkler system. The backup (secondary) protection is provided by hose stations in the area of the cable spreading room. The fire protection system, without the CO₂ system, meets the requirements of the NRC Standard Review Plan and Branch Technical Position 9.5-1, Revision 2. Therefore, the CO₂ system is not required for adequate fire protection.