

ATTACHMENT 2

Proposed Changes to Technical Specification Pages

<u>Unit 1</u>	<u>Revision</u>
Page IV	Replace
Page VIII	Replace
Page XIV	Replace
Page 3/4 3-59	Replace
Page 3/4 3-60	Delete
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Page 3/4 7-82	Replace
Page 3/4 7-83 thru	Delete
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Page B 3/4 7-7	Replace
Page 6-2	Replace

<u>Unit 2</u>	<u>Revision</u>
Page IV	Replace
Page VIII	Replace
Page XIV	Replace
Page 3/4 3-59	Replace
Page 3/4 3-60	Delete
Page 3/4 3-60a	Delete
Page 3/4 7-52	Replace
Page 3/4 7-53 thru	Delete
Page 3/4 7-63	
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3/4.3.3.9 FIRE DETECTION INSTRUMENTATION

This specification deleted. Pages 3/4 3-60 and 3/4 3-60a deleted.

PLANT SYSTEMS

3/4.7.11 FIRE SUPPRESSION SYSTEMS

This specification deleted. Pages 3/4 7-83 through 3/4 7-93 deleted.

PLANT SYSTEMS

BASES

3/4.7.12 FIRE BARRIER PENETRATIONS

This specification deleted.

INSTRUMENTATION

BASES

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3/4.3.3.8 ACCIDENT MONITORING INSTRUMENTATION

The OPERABILITY of the accident monitoring instrumentation ensures that sufficient information is available on selected plant parameters to monitor and assess these variables following an accident.

In the event more than four sensors in a reactor vessel level indicating system channel are inoperable, repairs may only be possible during the next refueling outage. This is because the sensors are accessible only after the missile shield is removed. If only one channel is inoperable, it shall be restored to OPERABLE status as soon as reasonably possible. If both channels are inoperable, at least one channel should be restored to OPERABLE status no later than by the end of the next refueling outage.

With the number of OPERABLE RVLIS channels less than the minimum channels required to be OPERABLE, the inoperable channels must be restored within 48 hours or an alternate method of monitoring the reactor vessel level must be initiated. Monitoring pressurizer level and upperhead subcooling is an acceptable alternative to the RVLIS since the RVLIS is primarily used to detect the formation of a void in the reactor vessel head.

A channel check of the RVLIS is a comparison of each valid sensor with its corresponding sensor in the opposite train to verify they display the same state (i.e., covered or uncovered). If the corresponding sensor in the opposite train is invalid then the level at that location can be determined based upon the state of the next highest sensor, pressurizer level, and upperhead subcooling.

A channel calibration of the RVLIS involves the calibration of the digital to analog and analog to digital converters, the cold reference junction, and the power supplies.

3/4.3.3.9 FIRE DETECTION INSTRUMENTATION

This specification deleted.

PLANT SYSTEMS

BASES

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The service life of a snubber is evaluated via manufacturer input and information through consideration of the snubber service conditions and associated installation and maintenance records (newly installed snubber, seal replaced, spring replaced, in high radiation area, in high temperature area, etc...). The requirement to monitor the snubber service life is included to ensure that the snubbers periodically undergo a performance evaluation in view of their age and operating conditions. These records will provide statistical bases for future consideration of snubber service life. The requirements for the maintenance of records and the snubber service life review are not intended to affect plant operation.

3/4.7.10 SEALED SOURCE CONTAMINATION

The limitations on removable contamination for sources requiring leak testing, including alpha emitters, is based on 10 CFR 70.39(c) limits for plutonium. This limitation will ensure that leakage from byproduct, source, and special nuclear material sources will not exceed allowable intake values.

Sealed sources are classified into three groups with surveillance requirements commensurate with the probability of damage to a source in that group. Those sources which are frequently handled are required to be tested more often than those which are not. Sealed sources which are continuously enclosed within a shielded mechanism (i.e. sealed sources within radiation monitoring or boron measuring devices) are considered to be stored and need not be tested unless they are removed from the shielded mechanism.

3/4.7.11 FIRE SUPPRESSION SYSTEMS

This specification deleted.

PLANT SYSTEMS

BASES

3/4.7.12 FIRE BARRIER PENETRATIONS

This specification deleted.

ADMINISTRATIVE CONTROLS

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6.2.2 FACILITY STAFF

- a. Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Reactor Operator shall be in the Control Room when fuel is in the reactor. In addition, at least one licensed Senior Reactor Operator shall be in the Control Room while the unit is in MODE 1, 2, 3 or 4.
- c. A Health Physics Technician[#] shall be on site when fuel is in the reactor.
- d. ALL CORE ALTERATIONS shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- e. (Deleted)
- f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions; e.g., Senior Reactor Operators, Reactor Operators, Health Physics Technicians, Auxiliary Operators, and key maintenance personnel. Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a nominal 40-hour week while the plant is operating.

In the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance or major plant modifications, on a temporary basis, the following guidelines shall be followed:

1. An individual will not be permitted to work more than 16 hours straight (not including shift turnover time).
2. There will be a break of at least 8 hours (which can include shift turnover time) between work periods.

The Health Physics Technician may be absent for a period of time not to exceed 2 hours in order to accommodate unexpected circumstances provided immediate action is taken to restore the Health Physics Technician to within the minimum requirement.

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INSTRUMENTATION

3/4.3.3.9 FIRE DETECTION INSTRUMENTATION

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PLANT SYSTEMS

3/4.7.11 FIRE SUPPRESSION SYSTEMS

This specification deleted. Pages 3/4 7-53 through 3/4 7-63 deleted.

PLANT SYSTEMS

3/4.7.12 FIRE BARRIER PENETRATIONS

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INSTRUMENTATION

BASES

3/4.3.3.8 ACCIDENT MONITORING INSTRUMENTATION

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PLANT SYSTEMS

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3/4.7.10 SEALED SOURCE CONTAMINATION

The limitations on removable contamination for sources requiring leak testing, including alpha emitters, is based on 10 CFR 70.39(c) limits for plutonium. This limitation will ensure that leakage from byproduct, source, and special nuclear material sources will not exceed allowable intake values.

Sealed sources are classified into three groups with surveillance requirements commensurate with the probability of damage to a source in that group. Those sources which are frequently handled are required to be tested more often than those which are not. Sealed sources which are continuously enclosed within a shielded mechanism (i.e. sealed sources within radiation monitoring or boron measuring devices) are considered to be stored and need not be tested unless they are removed from the shielded mechanism.

3/4.7.11 FIRE SUPPRESSION SYSTEMS

This specification deleted.

PLANT SYSTEMS

BASES

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3/4.7.12 FIRE BARRIER PENETRATIONS

This specification deleted.

3/4.7.13 AREA TEMPERATURE MONITORING

The area temperature limitations ensure that safety-related equipment will not be subjected to temperatures in excess of their environmental qualification temperatures. Exposure to excessive temperatures may degrade equipment and cause a loss of its OPERABILITY. The temperature limits include an allowance for instrument error of 2 F.

ADMINISTRATIVE CONTROLS

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6.2.2 FACILITY STAFF

- a. Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Reactor Operator shall be in the Control Room when fuel is in the reactor. In addition, at least one licensed Senior Reactor Operator shall be in the Control Room while the unit is in MODE 1, 2, 3 or 4.
- c. A Health Physics Technician[#] shall be on site when fuel is in the reactor.
- d. ALL CORE ALTERATIONS shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- e. (Deleted)
- f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions; e.g., Senior Reactor Operators, Reactor Operators, Health Physics Technicians, Auxiliary Operators, and key maintenance personnel. Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a nominal 40-hour week while the plant is operating.

In the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance or major plant modifications, on a temporary basis, the following guidelines shall be followed:

1. An individual will not be permitted to work more than 16 hours straight (not including shift turnover time).
2. There will be a break of at least 8 hours (which can include shift turnover time) between work periods.

The Health Physics Technician may be absent for a period of time not to exceed 2 hours in order to accommodate unexpected circumstances provided immediate action is taken to restore the Health Physics Technician to within the minimum requirement.

ATTACHMENT 3

Proposed Changes to Fire Protection
License Conditions

<u>Unit 1</u>	<u>Revision</u>
License Condition 2.C.(4)	Replace

<u>Unit 2</u>	<u>Revision</u>
License Condition 2.C.(6)	Replace

C.(4) Fire Protection Program

Alabama Power Company shall maintain in effect and fully implement all provisions of the approved fire protection plan. The approved fire protection plan consists of the document entitled, "Farley Nuclear Plant Fire Protection Program Reevaluation" which includes:

- Initial Issue, submitted with letter dated September 15, 1977;
- Amendment 1, submitted with letter dated February 23, 1978;
- Amendment 2, submitted with letter dated July 14, 1978;
- Amendment 3, submitted with letter dated October 27, 1978;
- Amendment 4, submitted with letter dated January 3, 1979.

Replace
with the
following
condition

The licensee may proceed with and is required to complete the modifications identified in Tables 1, 2 and 3 of the NRC's Joseph M. Farley Safety Evaluation Report, Fire Protection Review, Unit Nos. 1 and 2 dated February 12, 1979. Most of the modifications will be completed before the end of the second refueling outage for Unit No. 1. Exceptions are smoke detectors, penetration seals and barriers which will be completed by September 1, 1980. In the event that these modifications cannot be completed as identified in Tables 1, 2 and 3, the licensee shall submit a report, explaining the circumstances, together with a revised schedule for NRC approval.

Administrative control changes and procedure revisions shall be implemented as described in NRC's Safety Evaluation Report dated February 12, 1979.

Further, by January 1, 1980, Alabama Power Company shall provide for Commission review and obtain Commission approval of the final design of the modifications prior to implementation which would allow the reactor to be taken to cold shutdown without reliance on the cable spreading room, or the control room.

The fire protection program modifications are described in the Commission approved Farley Nuclear Plant Fire Protection Program. Alabama Power Company is authorized to make other changes to the program without prior Commission approval provided that such changes do not result in a decrease in the effectiveness of the program.

UNIT 1 OPERATING LICENSE NO. NPF-2

2.C.(4) Fire Protection Program

Alabama Power Company shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility and as approved in the Fire Protection SERs dated February 12, 1979, August 24, 1983, December 30, 1983, November 19, 1985, September 10, 1986 and December 29, 1986. Alabama Power Company may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown.

(UNIT 2)

- 4 -

- c. Performance of any test at a power level different from the level in the described program; and
 - d. Failure to complete any tests included in the described program (planned or scheduled) for power levels up to the authorized power level.
- (4) The licensee shall not use the spent fuel cask crane for the purpose of moving spent fuel casks prior to approval by the NRC of the lifting devices which attach the spent fuel cask to the crane.
- (5) The interval for testing pumps and valves in accordance with 10 CFR 50.55 a(g)(2) is 120 months commencing with the start of commercial operation. The licensee shall provide additional information needed by the NRC to complete its detailed review of the licensee's inservice testing program for pumps and valves no later than 6 months prior to the end of the first 120-month interval.
- (6) Fire Protection Program

~~The licensee shall maintain in effect and fully implement all provisions of the approved fire protection plan except as modified by the NRC's Joseph M. Farley Safety Evaluation Report, Fire Protection Review, Units 1 and 2, transmitted to the licensee on April 13, 1979 (Fire Protection SER). The approved fire protection plan consists of the document entitled "Farley Nuclear Plant Fire Protection Program Reevaluation" which includes:~~

~~Initial Issue, submitted with letter dated September 15, 1977;~~

~~Amendment 1, submitted with letter dated February 23, 1978;~~

~~Amendment 2, submitted with letter dated July 14, 1978;~~

~~Amendment 3, submitted with letter dated October 27, 1978;~~

~~Amendment 4, submitted with letter dated January 3, 1979, and amended by letter dated October 21, 1980.~~

~~Administrative control changes and procedure revisions shall be implemented and maintained in effect as described in NRC's Fire Protection SER.~~

~~The licensee shall comply with the fire protection program set forth in Appendix R to 10 CFR Part 50 in accordance with the requirements of §50.48 of 10 CFR Part 50.~~

Replace
with the
Following
condition.

UNIT 2 OPERATING LICENSE NO. NPF-8

2.C.(6) Fire Protection Program

Alabama Power Company shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility and as approved in the Fire Protection SERs dated February 12, 1979, August 24, 1983, December 30, 1983, November 19, 1985, September 10, 1986 and December 29, 1986. Alabama Power Company may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown.

ATTACHMENT 4

Significant Hazards Evaluation Pursuant to 10 CFR 50.92 for the Proposed Changes to the Fire Protection Technical Specifications and License Conditions

Proposed Changes

In accordance with Generic Letter 86-10, Alabama Power Company incorporated the fire protection program into the July 1987 FSAR update as Appendix 9B. Appendix 9B describes the program as approved by the NRC including the fire hazards analysis and major commitments that form the basis for the program. Consequently, Alabama Power Company submits the following proposed changes to the fire protection license conditions and the fire protection portions of the Technical Specifications in accordance with the guidance provided in Generic Letter 88-12.

Revise the fire protection license conditions 2.C.(4) for Unit 1 and 2.C.(6) for Unit 2 to provide consistency with the standard fire protection license condition contained in NRC Generic Letter 86-10. Delete Unit 1 and Unit 2 fire protection Technical Specifications 3/4.3.3.9, 3/4.7.11.1, 3/4.7.11.2, 3/4.7.11.3, 3/4.7.11.4, 3/4.7.11.5, 3/4.7.12 and associated bases. Delete the minimum Fire Brigade staffing requirement, Technical Specification 6.2.2(e) for both Units 1 and 2, and revise the footnote to delete reference to fire brigade staffing.

Background

Nuclear Regulatory Commission (NRC) Generic Letter 86-10, "Implementation of Fire Protection Requirements," dated April 24, 1986 requested that licensees incorporate into their FSAR the fire protection program that has been approved by the NRC, including the fire hazards analysis and major commitments that form the basis for the fire protection program. Generic Letter 86-10 states, "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 be on a consistent status with other plant features described in the FSAR. Also, the provisions of 10 CFR 50.59 would then apply directly for the changes the licensee desires to make in the fire protection program that would not adversely affect the ability to achieve and maintain safe shutdown." Generic Letter 86-10 also states that, upon completion of this effort, the licensee may apply for an amendment to the operating license which amends any current license conditions regarding fire protection and substitutes a standard condition. As a result of the license condition and the placement of the fire protection program in the FSAR where it is controlled via 10 CFR 50.59, Generic Letter 86-10 states that licensees may request an amendment to delete the technical specifications that will become unnecessary. Additional guidance is provided by Generic Letter 88-12.

Bases

In accordance with Generic Letter 86-10, Alabama Power Company incorporated the fire protection program into the July 1987 FSAR update as Appendix 9B. FSAR Appendix 9B documents the evaluation of the Farley Nuclear Plant fire protection program against Appendix A to BTP APCS 9.5-1 and Appendix R to 10 CFR 50 and contains the fire hazards analysis and the major commitments that form the basis for the program. In addition, Sections 9B.2.2.5,

9B.2.3.2, and Attachment C to Appendix 9B of the FSAR contain the requirements that replace those which have been proposed for deletion from the Technical Specifications with the following exceptions:

1. The shutdown and startup requirements of Technical Specification 3.0.3 and 3.0.4, which apply to Technical Specification 3/4.7.11.1, Action statement b.
2. The Surveillance Requirements "grace period" of Technical Specification 4.0.2.

The requirements of 1 and 2 above will also be added to the FSAR.

Analysis

Alabama Power Company has reviewed the requirements of 10 CFR 50.92 as they relate to the proposed changes to the fire protection Technical Specifications and license conditions and considers these changes not to involve a significant hazards consideration. In support of this conclusion, the following analyses are provided.

1. Deletion of Technical Specifications 3/4.3.3.9, "Fire Detection Instrumentation"; 3/4.7.11.1, "Fire Suppression Water System"; 3/4.7.11.2, "Spray and/or Sprinkler Systems"; 3/4.7.11.3, "CO₂ Systems"; 3/4.7.11.4, "Fire Hose Stations"; 3/4.7.11.5, "Yard² Fire Hydrants and Hydrant Hose Houses"; 3/4.7.12, "Fire Barrier Penetrations"; and associated bases:
 - a. The proposed changes will not involve a significant increase in the probability or consequences of an accident previously evaluated because the Technical Specification requirements to maintain the fire protection systems have been replaced with the requirements which appear in Attachment C to Appendix 9B to the FSAR. The following changes to these Technical Specification requirements have been made to the requirements which appear in Attachment C to Appendix 9B to the FSAR:
 - The special reporting requirement was deleted for inoperable fire protection equipment.
 - The reference to Specifications 3.0.3 and 3.0.4 was deleted.
 - The shutdown and startup requirements of Technical Specifications 3.0.3 and 3.0.4 which apply to Technical Specification 3/4.7.11.1, Action Statement b will be incorporated into plant procedures.
 - The lists of fire detection instrumentation were updated to reflect Appendix R commitments.
 - The requirement to provide an alternate backup pump or supply in the event that a backup pump or supply is not available was added.

- ° The requirement that each fire pump develop at least 2500 gpm at a system head of 125 psi was revised to specify at least 2500 gpm at a differential head of 125 psi.
- ° The lists of fire suppression systems were updated to reflect Appendix R commitments.

The operability and surveillance requirements will be maintained in the FSAR and plant procedures where changes must be evaluated in accordance with 10 CFR 50.59. The provisions of 10 CFR 50.59 allow changes to be made to the FSAR and plant procedures without prior NRC approval. Changes to the fire protection program in the FSAR and plant procedures may be made only if the changes will not adversely affect the ability to achieve and maintain safe shutdown. Per Technical Specifications 6.5.1.6(b) and 6.5.1.7(a), the Plant Operations Review Committee (PORC) will continue to review safety evaluations prepared in accordance with the provisions of 10 CFR 50.59 for changes to the fire protection program implementation and recommend in writing approval or disapproval of such safety evaluations to the General Manager-Nuclear Plant. Additionally, Technical Specification 6.8.1(f) requires that written procedures be established, implemented and maintained covering the fire protection program implementation. These administrative controls will ensure that changes to the operability and surveillance requirements are performed in accordance with 10 CFR 50.59 and will not involve an increase in the probability or consequences of an accident or adversely affect the ability to achieve and maintain safe shutdown. Therefore, the deletion of Technical Specifications 3/4.3.3.9, 3/4.7.11.1, 3/4.7.11.2, 3/4.7.11.3, 3/4.7.11.4, 3/4.7.11.5 and 3/4.7.12 and the placement of the same operability and surveillance requirements into the FSAR and plant procedures will not involve a significant increase in the probability or consequences of an accident previously evaluated.

- b. These changes do not create the possibility of a new or different kind of accident from any accident previously evaluated. The requirements to maintain operability of the detection instrumentation, the fire suppression water system, the spray and/or sprinkler systems, the CO₂ systems, the fire hose stations, the yard fire hydrants and hydrant hose houses, and the fire barrier penetrations and to perform surveillance requirements to ensure operability of these systems are retained; these requirements have simply been moved from the Technical Specifications to the FSAR. Plant procedures will be developed from the existing procedures that implement this Technical Specification to provide specific instructions for implementing the operability and surveillance requirements. Therefore, the possibility of a new or different kind of accident from any accident previously evaluated will not be created by these changes.

- c. The proposed changes will not involve a significant reduction in the margin of safety because the operability and surveillance requirements will be maintained in the FSAR and plant procedures where changes must be evaluated in accordance with 10 CFR 50.59. The provisions of 10 CFR 50.59 allow changes to be made to the FSAR and plant procedures without prior NRC approval. Changes to the fire protection program in the FSAR and plant procedures may be made only if the changes will not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire. Additionally, the administrative controls discussed in item (a) above will ensure that changes to these operability and surveillance requirements are performed in accordance with 10 CFR 50.59 and will not involve a reduction in a margin of safety or adversely affect the ability to achieve and maintain safe shutdown in the event of a fire. Therefore, the deletion of these technical specifications and the placement of the same operability and surveillance requirements into the FSAR and plant procedures will not involve a significant reduction in the margin of safety.
2. Deletion of the Fire Brigade Minimum Staffing Requirement, Technical Specification 6.2.2(e):
 - a. The proposed change will not involve a significant increase in the probability or consequences of an accident previously evaluated because the Technical Specification requirements to maintain the Fire Brigade staffing will be replaced by the requirements which are discussed in detail in Appendix 9B to the FSAR. This administrative control will be maintained in the FSAR where changes must be evaluated in accordance with 10 CFR 50.59. The provisions of 10 CFR 50.59 allow changes to be made to the FSAR without prior NRC approval. Changes to the fire protection program in the FSAR may be made only if the changes will not adversely affect the ability to achieve and maintain safe shutdown. Per Technical Specifications 6.5.1.6(b) and 6.5.1.7(a), the PORC will continue to review safety evaluations prepared in accordance with the provisions of 10 CFR 50.59 for changes to the fire protection program implementation and recommend in writing approval or disapproval of such safety evaluations to the General Manager-Nuclear Plant. Additionally, Technical Specification 6.8.1(f) requires that written procedures be established, implemented and maintained covering the fire protection program implementation. These established administrative controls will ensure that changes to this requirement are performed in accordance with 10 CFR 50.59 and will not involve an increase in the probability or consequences of an accident or adversely affect the ability to achieve and maintain safe shutdown. Therefore, the deletion of Technical Specification 6.2.2(e) and the placement of the same requirement into the FSAR will not involve a significant increase in the probability or consequences of an accident previously evaluated.
 - b. This change does not create the possibility of a new or different kind of accident from any accident previously evaluated. The requirement to maintain minimum fire brigade staffing is retained; this requirement has simply been moved from the Technical Specifications to the FSAR. Therefore, the possibility of a new or different kind of accident from any accident previously evaluated will not be created by this change.

- c. The proposed change will not involve a significant reduction in the margin of safety because this administrative control will be maintained in the FSAR where changes must be evaluated in accordance with 10 CFR 50.59. The provisions of 10 CFR 50.59 allow changes to be made to the FSAR without prior NRC approval. Changes to the fire protection program in the FSAR may be made only if the changes will not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire. Additionally, the established administrative controls discussed in item (a) above will ensure that changes to this requirement are performed in accordance with 10 CFR 50.59 and will not involve a reduction in the margin of safety or adversely affect the ability to achieve and maintain safe shutdown in the event of a fire. Therefore, the deletion of this technical specification and the placement of the same operability and surveillance requirements into the FSAR will not involve a significant reduction in the margin of safety.
3. Revision of Minimum Staffing Requirements Footnote on Technical Specification Page 6-2:
 - a. The proposed change will not involve a significant increase in the probability or consequences of an accident previously evaluated because the change is an editorial clarification. The footnote provides an exception to the minimum staffing requirements for the fire brigade and the health physics technician. The exception to the minimum staffing requirements for the fire brigade has been replaced by the requirements which are discussed in Appendix 9B to the FSAR, along with the minimum fire brigade staffing requirements. The changes to the exception to the health physics technician staffing requirements (Footnote on Page 6-2) are necessary as a result of the removal of the fire brigade from the footnote. These changes are strictly editorial. Therefore, this proposed change will not involve a significant increase in the probability or consequences of an accident previously evaluated.
 - b. This change does not create the possibility of a new or different kind of accident from any accident previously evaluated. The requirement to maintain minimum fire brigade staffing is retained; this requirement has simply been moved from the Technical Specifications to the FSAR. Therefore, the possibility of a new or different kind of accident from any accident previously evaluated will not be created by this change.
 - c. The proposed change will not involve a significant reduction in the margin of safety because this administrative control will be maintained in the FSAR where changes must be evaluated in accordance with 10 CFR 50.59. The provisions of 10 CFR 50.59 allow changes to be made to the FSAR without prior NRC approval. Changes to the fire protection program in the FSAR may be made only if the changes will not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire. Additionally, the established administrative controls discussed in item (a) above will ensure that changes to this requirement are performed in accordance with 10 CFR 50.59 and will not involve a reduction in the margin of safety or adversely affect the ability to achieve and maintain safe shutdown in the event of a fire. Therefore, the deletion of this technical specification and the placement of the same operability and surveillance requirements into the FSAR will not involve a significant reduction in the margin of safety.

4. Revision of Unit 1 license condition 2.C.(4) and Unit 2 license condition 2.C.(6):
 - a. The proposed changes will not involve a significant increase in the probability or consequences of an accident previously evaluated. The existing license conditions require all provisions of the approved fire protection program to be maintained in effect, and require that any changes which would decrease the effectiveness of the fire protection program receive prior Commission approval. The new license conditions also require all provisions of the approved fire protection program to be maintained in effect, and that changes to the fire protection program be made under the provisions of 10 CFR 50.59 only if the changes will not adversely affect the ability to achieve and maintain safe shutdown. The new license conditions simply change the criteria by which Alabama Power Company is authorized to make changes to the program without prior NRC approval. These new criteria preserve the ability to achieve and maintain safe shutdown of the plant in the event of a fire. The overall objective of the existing fire protection program and license conditions is to ensure safe shutdown of the plant in the event of a fire. Therefore, the new license conditions are consistent with the objective of the existing license conditions and NRC Generic Letter 86-10. Consequently, these changes will not involve a significant increase in the probability or consequences of an accident previously evaluated.
 - b. These changes do not create the possibility of a new or different kind of accident from any accident previously evaluated. The new license conditions will ensure that the ability to achieve and maintain safe shutdown in the event of a fire is preserved. Since these new license conditions are consistent with the objective of the old license conditions, these changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.
 - c. The proposed changes will not involve a significant reduction in the margin of safety. All modifications identified in Tables 1, 2 and 3 of the NRC's Joseph M. Farley Safety Evaluation Report, Fire Protection Review, Unit Nos. 1 and 2 dated February 12, 1979 have been dispositioned, as required by the existing Unit 1 and Unit 2 license conditions. Administrative control changes and procedure revisions discussed in the February 12, 1979 SER have been completed and Commission approval of design modifications which would allow the reactor to be taken to cold shutdown without reliance on the cable spreading room or control room was obtained, as required by the existing Unit 1 license condition. Appendix 9B to the FSAR documents Alabama Power Company's compliance with the fire protection program set forth in Appendix R to 10 CFR Part 50 in accordance with the requirements of paragraph 50.48 of 10 CFR Part 50, which is required by the existing Unit 2 license condition. Therefore, all provisions of acceptance in the existing license conditions have been addressed and the adoption of the proposed new license conditions simply changes the criterion by which Alabama Power Company is authorized to make changes to the

approved program. As discussed in a. above, the new license conditions are consistent with the objective of the existing license conditions. Accordingly, these proposed changes will not involve a significant reduction in the margin of safety.

Conclusion

Based upon the analysis provided herein, Alabama Power Company has determined that the proposed changes to the Technical Specifications and license conditions will not involve a significant increase in the probability or consequences of an accident previously evaluated, create the possibility of a new or different kind of accident from any accident previously evaluated, or involve a significant reduction in a margin of safety. Therefore, Alabama Power Company has determined that these proposed changes meet the requirements of 10 CFR 50.92(c) and do not involve a significant hazards consideration.