

ATTACHMENT A

1. Remove pages: 3/4 3-47, B 3/4 3-3
2. Insert pages: 3/4 3-47, B 3/4 3-3

FIRE DETECTION INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.6 As a minimum, the fire detection instrumentation for each fire detection zone shown in Table 3.3-10 shall be OPERABLE:

APPLICABILITY: Whenever equipment in that fire detection zone is required to be OPERABLE.

ACTION

With the number of OPERABLE fire detection instruments less than required by Table 3.3-10:

- a. Within 1 hour establish a fire watch patrol to inspect the zone(s) with the inoperable instrument(s) at least once per hour, unless the instrument(s) is located inside the containment, then inspect the containment at least once per 8 hours or monitor the containment air temperature at least once per hour at the locations listed in Specification 4.6.1.
- b. Restore the inoperable instrument(s) to OPERABLE status within 14 days or, 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 instrument(s) to OPERABLE status.
- c. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.6.1 Each of the above required fire detection instruments which are accessible during plant operations shall be demonstrated OPERABLE at least once per 6 months by performance of a CHANNEL FUNCTIONAL TEST. Fire detectors which are not accessible during plant operation shall be demonstrated OPERABLE by performance of a CHANNEL FUNCTIONAL TEST during each COLD SHUTDOWN exceeding 24 hours unless performed in the previous 6 months.

4.3.3.6.2 The NFPA Code 72D Class A supervised circuits supervision associated with the detector alarms of each of the above required fire detection instruments shall be demonstrated OPERABLE at least once per 6 months.

4.3.3.6.3 The non-supervised circuits between the local panels in Specification 4.3.3.6.2 and the control room shall be demonstrated OPERABLE at least once per 31 days.

INSTRUMENTATION

BASES

3/4.3.3.5 REMOTE SHUTDOWN INSTRUMENTATION

The OPERABILITY of the remote shutdown instrumentation ensures that sufficient capability is available to permit shutdown and maintenance of HOT STANDBY of the facility from locations outside of the control room. This capability is required in the event control room habitability is lost and is consistent with General Design Criteria 19 of 10 CFR 50.

3/4.3.3.6 FIRE DETECTION INSTRUMENTATION

OPERABILITY of the fire detection instrumentation ensures that adequate warning capability is available for the prompt detection of fires. This capability is required in order to detect and locate fires in their early stages. Prompt detection of fires will reduce the potential for damage to safety-related equipment and is an integral element in the overall facility fire protection program.

In the event that a portion of the fire detection instrumentation is inoperable, the establishment of frequent fire patrols or in containment air temperature monitoring in the affected areas is required to provide detection capability until the inoperable instrumentation is restored to OPERABILITY.

3/4.3.3.7 CHLORINE DETECTION SYSTEMS

The OPERABILITY of the chlorine detection system ensures that sufficient capability is available to promptly detect and initiate protective action in the event of an accidental chlorine release. This capability is required to protect control room personnel and is consistent with the recommendations of Regulatory Guide 1.95, "Protection of Nuclear Power Plant Control Room Operators Against an Accidental Chlorine Release," February 1975.

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 during and following an accident. This capability is consistent with the recommendations of Regulatory Guide 1.97, "Instrumentation for Light-Water-Cooled Nuclear Plants to Assess Plant Conditions During and Following an Accident," December 1975 and NUREG-0578, "TMI-2 Lessons Learned Task Force Status Report and Short-Term Recommendations."

ATTACHMENT B

Safety Evaluation

Proposed Change Request No. 105 amends the fire detection instrumentation specification to address fire detectors not accessible during plant operation. Also included is a change to reflect the revised reporting requirements in accordance with Generic Letter 83-43.

Description and Purpose of Change

1. Page 3/4 3-47 Section 3.3.3.6 Fire Detection Instrumentation has been amended by revising Action statement a and surveillance requirement 4.3.3.6.1 to reflect the Standard Technical Specification. Action statement b has been revised by deleting the phrase "in lieu of any other report required by Specification 6.9.1" to reflect the revised reporting requirements in accordance with Generic Letter 83-43.
2. page B 3/4 3-3 Bases Section 3/4.3.3.6 Fire Detection Instrumentation has been revised to reflect the above change to Action statement a.

Basis for Proposed No Significant Hazards Consideration Determination

The proposed administrative changes correct the Fire Detection Instrumentation specification by addressing fire detectors not accessible during plant operation.

The Commission has provided guidance concerning the application of these standards by providing certain examples (48 FR 14870). One of these, Example (i), involving no significant hazards consideration is "A purely administrative change to technical specifications, for example, correction of an error." The proposed changes match this example, therefore, it is proposed that the change be characterized as involving no significant hazards consideration.

Basis

1. Is the probability of an occurrence or the consequence of an accident or malfunction of equipment important to safety as previously evaluated in the UFSAR increased? No

Reason

Section 3.3.3.6 Fire Detection Instrumentation has been revised to

address fire detectors not accessible during plant operation. Action statement a has been revised to reflect the Standard Technical Specification which allows alternate means of fire detection (i.e., containment inspection at least once per 8 hours or monitoring containment air temperature at least once per hour) when less than the minimum number of containment fire detectors are operable.

Surveillance Requirement 4.3.3.6.1 Channel Functional Test requirements have also been revised to allow detectors not accessible during plant operation to be tested during each cold shutdown exceeding 24 hours unless performed in the previous 6 months. This reflects the Standard Technical Specification requirements and will satisfy ALARA considerations by reducing the potential doses received by personnel during performance of the tests. Action statement b has been revised to reflect the revised reporting requirements in accordance with Generic Letter 82-43. These changes are administrative in nature since the action statements and surveillance requirement have been revised to reflect the Standard Technical Specifications. Since no physical change to plant equipment is involved, the revisions are not a safety concern and will not increase the probability of an occurrence or the consequence of an accident previously evaluated in the UFSAR..

2. Is the possibility for an accident or malfunction of a different type than previously evaluated in the UFSAR created? No

Reason

The changes are being made to correct a deficiency in the specifications, to cover fire detectors not accessible during plant operation. The proposed changes are administrative in nature and do not physically change plant safety-related systems, components or structures, therefore, the changes will not create the possibility for a new type of accident or malfunction of a different type than any previously evaluated in the UFSAR.

3. Is the margin of safety as defined in the basis for any Technical Specification reduced? No

Reason

The fire detection instrumentation bases have been revised to reflect the change to the action statement and also reflects the addition of the fire detectors to containment. The changes are administrative in nature, therefore, the margin of safety inherent in the applicable bases will not be reduced.

4. Based on the above, is an unreviewed safety question involved? No

Conclusion

The proposed changes are being made to correct a deficiency in the technical specifications, to address fire detectors not accessible during

plant operation. The changes are administrative in nature and do not involve physical change to any plant safety-related systems, components or structures, will not increase the likelihood of a malfunction of safety-related equipment, increase the consequences of an accident previously analyzed, nor create the possibility of a malfunction different than previously evaluated in the UFSAR. The changes are not a safety concern and do not affect the UFSAR.

Based on the considerations above, the proposed administrative changes have been determined to be safe and do not involve an unreviewed safety question.