ENCLOSURE 1

PROPOSED TECHNICAL SPECIFICATION (TS) BASES CHANGE

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2

DOCKET NOS. 50-327 AND 50-328

(TVA-SQN-TS-92-05)

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3/4.3.3.8 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 in the affected areas is required to provide detection capability until the inoperable instrumentation is restored to OPERABILITY.

INSERT A

3/4.3.3.9

This specification is deleted.

3/4.3.3.10 EXPLOSIVE GAS MONITORING INSTRUMENTATION

R152

This instrumentation includes provisions for monitoring the concentrations of potentially explosive gas mixtures in the waste gas holdup system. The OPERABILITY and use of this instrumentation is consistent with the requirements for monitoring potentially explosive gas mixtures.

R153

SNUBBERS (Continued)

location, etc.), and the recommendations of Regulatory Guide 8.8 and 8.10. The addition or deletion of any hydraulic or mechanical snubber shall be made in accordance with Section 50.59 of 10 CFR Part 50. R43

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 according to their use, 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

The OPERABILITY of the fire suppression systems ensures that adequate fire suppression capability is available to confine and extinguish fires occurring in any portion of the facility where safety related equipment is located. The fire suppression system consists of the water system, spray and/or sprinklers, CO_2, and fire hose stations. The collective capability of the fire suppression systems is adequate to minimize potential damage to safety related equipment and is a major element in the facility fire protection program.

In the event that portions of the fire suppression systems are inoperable, alternate backup fire fighting equipment is required to be made available in the affected areas until the inoperable equipment is restored to service. When the inoperable fire fighting equipment is intended for use as a backup means of fire suppression, a longer period of time is allowed to provide an alternate means of fire fighting than if the inoperable equipment is the primary means of fire suppression.

The surveillance requirements provide assurance that the minimum OPERABILITY requirements of the fire suppression systems are met.

In the event the fire suppression water system becomes inoperable, immediate corrective measures must be taken since this system provides the major fire suppression capability of the plant. The requirement for a twenty-four hour report to the Commission provides for prompt evaluation of the acceptability of the corrective measures to provide adequate fire suppression capability for the continued protection of the nuclear plant.

INSERT B

3/4.7.12 FIRE BARRIER PENETRATIONS

The functional integrity of the fire barrier penetrations ensures that fires will be confined or adequately retarded from spreading to adjacent portions of the facility. This design feature minimizes the possibility of a single fire rapidly involving several areas of the facility prior to detection and extinguishment. The fire barrier penetrations are a passive element in the facility fire protection program and are subject to periodic inspections.

Fire barrier penetrations, including cable penetration barriers, fire doors and dampers are considered functional when the visually observed condition is the same as the as-designed condition. For those fire barrier penetrations that are not in the as-designed condition, an evaluation shall be performed to show that the modification has not degraded the fire rating of the fire barrier penetration.

During periods of time when a barrier is not functional, either, 1) a continuous fire watch is required to be maintained in the vicinity of the affected barrier, or 2) the fire detectors on at least one side of the affected barrier must be verified OPERABLE and a hourly fire watch patrol established, until the barrier is restored to functional status.

INSERT B

3/4.3.3.8 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 in the affected areas is required to provide detection capability until the inoperable instrumentation is restored to OPERABILITY. R35

INSERT A

3/4.3.3.9

This Specification is deleted. R134

3/4.3.3.10 EXPLOSIVE GAS MONITORING INSTRUMENTATION

This instrumentation includes provisions for monitoring the concentrations of potentially explosive gas mixtures in the waste gas holdup system. The OPERABILITY and use of this instrumentation is consistent with the requirements for monitoring potentially explosive gas mixtures. R134

3/4.7.11 FIRE SUPPRESSION SYSTEMS

The OPERABILITY of the fire suppression systems ensures that adequate fire suppression capability is available to confine and extinguish fires occuring in any portion of the facility where safety related equipment is located. The fire suppression system consists of the water system, spray and/or sprinklers, CO_2, and fire hose stations. The collective capability of the fire suppression systems is adequate to minimize potential damage to safety related equipment and is a major element in the facility fire protection program.

In the event that portions of the fire suppression systems are inoperable, alternate backup fire fighting equipment is required to be made available in the affected areas until the inoperable equipment is restored to service. When the inoperable fire fighting equipment is intended for use as a backup means of fire suppression, a longer period of time is allowed to provide an alternate means of fire fighting than if the inoperable equipment is the primary means of fire suppression.

The surveillance requirements provide assurance that the minimum OPERABILITY requirements of the fire suppression systems are met.

In the event the fire suppression water system becomes inoperable, immediate corrective measures must be taken since this system provides the major fire suppression capability of the plant. The requirement for a twenty-four hour report to the Commission provides for prompt evaluation of the acceptability of the corrective measures to provide adequate fire suppression capability for the continued protection of the nuclear plant.

INSERT B

3/4.7.12 FIRE BARRIER PENETRATIONS

The functional integrity of the fire barrier penetrations ensures that fires will be confined or adequately retarded from spreading to adjacent portions of the facility. This design feature minimizes the possibility of a single fire rapidly involving several areas of the facility prior to detection and extinguishment. The fire barrier penetrations are a passive element in the facility fire protection program and are subject to periodic inspections.

Fire barrier penetrations, including cable penetration barriers, fire doors and dampers are considered functional when the visually observed condition is the same as the as-designed condition. For those fire barrier penetrations that are not in the as-designed condition, an evaluation shall be performed to show that the modification has not degraded the fire rating of the fire barrier penetration.

During periods of time when a barrier is not functional, either, 1) a continuous fire watch is required to be maintained in the vicinity of the affected barrier, or 2) the fire detectors on at least one side of the affected barrier must be verified OPERABLE and a hourly fire watch patrol established, until the barrier is restored to functional status.

INSERT B

INSERT A

All hourly fire watch patrols require that a trained individual be in the specified area at intervals of 60 minutes with a margin of 15 minutes.

INSERT B

All hourly fire watch patrols require that a trained individual be in the specified area at intervals of 60 minutes with a margin of 15 minutes.

A continuous fire watch requires that a trained individual be in the specified area at all times, that the specified area contain no impediment to restrict the movements of the continuous fire watch, and that each compartment within the specified area is patrolled at least once every 15 minutes with a margin of 5 minutes.

A specified area for a continuous fire watch is one or more locations, which are easily accessible to each other and can be patrolled within 15 minutes. Easy access is defined as: no locked doors or inoperable card reader, no C-Zone entry required, or no hazards that will interfere with the continuous fire watch activity being performed within the 15-minute period.

ENCLOSURE 2

PROPOSEL TECHNICAL SPECIFICATION (TS) BASES CHANGE

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2

DOCKET NOS. 50-327 AND 50-328

(TVA-SQN-TS-92-05)

DESCRIPTION AND JUSTIFICATION FOR
REVISION OF TS BASES FOR FIRE WATCHES

Description of Change

TVA proposes to modify the Sequoyah Nuclear Plant (SQN) Units 1 and 2 technical specifications (TSs) bases to revise TS Bases 3/4.3.3.8, "Fire Detection Instrumentation," 3/4.7.11, "Fire Suppression Systems," and 3/4.7.12, "Fire Barrier Penetrations." The changes provide clarification and interpretation for both hourly and continuous fire watches.

The following wording is proposed to be added to TS Bases 3/4.3.3.8:

All hourly fire watch patrols require that a trained individual be in the specified area at intervals of 60 minutes with a margin of 15 minutes.

The following wording is proposed to be added to TS Bases 3/4.7.11 and 3/4.7.12:

All hourly fire watch patrols require that a trained individual be in the specified area at intervals of 60 minutes with a margin of 15 minutes.

A continuous fire watch requires that a trained individual be in the specified area at all times, that the specified area contains no impediment to restrict the movements of the continuous fire watch, and that each compartment within the specified area is patrolled at least once every 15 minutes with a margin of 5 minutes.

A specified area for a continuous fire watch is one or more locations, which are easily accessible to each other and can be patrolled within 15 minutes. Easy access is defined as: no locked doors or inoperable card reader, no step-off pads, or no hazards that will interfere with the continuous fire watch activity being performed within the 15-minute period.

Reason for Change

The TSs do not currently provide an interpretation of the terms "hourly" or "continuous" fire watches; the addition of the proposed discussion to the TS bases will allow all personnel to have a common interpretation of these terms.

The proposed change will aid in the reduction of fire watches not believed to be necessary for the prompt detection of fires and will clarify the requirements for meeting the time frequencies of the watches. Adding this information to the bases will reduce the fire watch burden at SQN by allowing a single continuous fire watch to cover more than one impairment at a time.

Justification for Change

It is desirable to quantify the limits associated with the hourly patrol requirements and provide tolerances. Defining an hourly fire watch frequency as 60-minute intervals with a 15-minute margin provides reasonable administrative flexibility and is consistent with other TS surveillance frequencies that allow margins of 25 percent.

The current TS wording infers a separate stationary, continuous firewatch is needed for each compartment or area outside immediate visual range. It is believed that prompt detection of fires can be achieved by a continuous fire watch monitoring multiple impairments in a given fire area, provided movement is not restricted by locked doors, contamination zones, etc., and the impairments are checked no less than every 15 minutes with a 5-minute margin.

These changes are considered to provide reasonable administrative flexibility and reduce the overall firewatch burden while maintaining an acceptable level of detection. The proposed changes are not considered to change the intent of the TSs and are similar to the wording contained in the corresponding D. C. Cook Nuclear Plant technical specification bases.