

November 2, 1983

Note to D. Wigginton

SUBJECT: COOK 1 FIRE PROTECTION SYSTEM (OELD # 838 849)

Dave, this package needs some more work on two points. First, with respect to the "purely administrative changes to the tech specs", give a better "for example" that that or at least tell me a little more about these changes. I looked through them at the place where the change is noted by the bar on the side. These look like the changes could be quite significant. Since I don't have a copy of the present specs, I can't tell myself what the nature of the change is from the old one to the new one that you're calling administrative. If it would help you, send the package back to me with today's version of the tech specs for those pages along with the incoming proposal tech spec change pages. Maybe I can see for myself what I'm talking about.

Second, on the TV camera picture story, as I gather, both of these are backups. They have the necessary sprinkler system to comply with Appendix R but when the sprinkler system is inoperable, you are going to let them operate for 14 days. As I understand it that's fairly common but we usually require that for that period while the system is inoperable that licensees have a continuous fire watch. You are going to let Cook use a closed circuit TV camera rather than a continuous fire watch. You are going to let Cook use a closed circuit TV camera rather than a continuous fire watch for the reactor coolant pump area. For the part that can't be detected by the TV monitor, an hourly fire watch. You need to do a little more work explaining why this doesn't significantly reduce the safety of the fire protection watch, particularly since the TV requirement does not call for a continuous monitoring by the closed circuit TV but only for periodic monitoring and hourly logging. I would use a different example than the one you used. Rather than the example of changing the limiting condition for operation, I would use the one in which there is a change that involves, perhaps, some reduction in safety margin but its not significant. I would use that example and then explain what the effect of using TV on the fire protection availability is and why you're saying that its not significant.

AMB
for Joe Scinto

P.S. Another point that has nothing to do with the prenotice but it looks to me like the action statement involved is badly worded. It looks to me like it says they have to restore the system within 14 days or send us a report within the 30 days telling us what they're going to do. So they have a choice of either restoring it in 14 days or not restoring it in 14 days. Sounds like a weird tech spec.