

**FLORIDA POWER CORPORATION
CRYSTAL RIVER UNIT 3
DOCKET NO. 50-302/LICENSE NO. DPR-72
REQUEST NO. 130, REVISION 0
FIRE SERVICE SYSTEM TECHNICAL SPECIFICATIONS**

LICENSE DOCUMENT INVOLVED: Technical Specifications

PORTION:	3.3.3.7	Fire Detection Instrumentation
	3.7.11.2	Deluge and Sprinkler Systems
	3.7.11.4	Fire Hose Stations

DESCRIPTION OF REQUEST:

This submittal requests that the Tables of Fire Detection Instrumentation, Deluge, and Sprinkler Systems and Fire Hose Stations be moved from the Technical Specifications to the Crystal River Unit 3 Fire Protection Plan.

Additionally, the requirement to route an equivalent capacity fire hose to an area with an inoperable hose has been revised. The new requirement specifies that the capability to route a hose to the area be demonstrated.

REASON FOR REQUEST:

This change will allow timely implementation of the limiting condition for operation for additional and revised detection and suppression systems that are being added or modified per Appendix R. Currently, Florida Power Corporation expects the final designation of the new and modified fire protection equipment by the end of Refuel V. Since final designation is necessary in order to update current Technical Specification pages, very little time will be available to process a Technical Specification change within the NRC. By deleting these tables from the Technical Specification, formal amendment processing at the last minute is avoided. If these tables are not deleted or revised, the Technical Specifications will be inaccurate due to these Appendix R modifications.

The revision to the action statement for an inoperable fire hose station prevents blocking open fire doors when routing an equivalent capacity hose to the affected area. This revision allows routing the hose to the area and disconnecting the hose at either side of the fire doors, or routing a hose to the first fire door and verifying adequate length for protection, etc.

EVALUATION OF REQUEST:

While this change will decrease the degree of control to which the tables currently are subject, the new level of control will be appropriate for this type of equipment. Controls include:

1. Specification 6.8.1 requires the maintenance of a fire protection program.
2. Changes to the program, and hence the subject tables require a Plant Review Committee and Nuclear Plant Manager Review prior to implementation.
3. The program is periodically audited pursuant to Specification 6.1.2, 6.1.3, and 6.5.2.9.g.

This program is readily available to NRC Inspectors for comment and enforcement. Additionally, changes in the detection and suppression systems such as location, type, etc., would be changes to the facility; such changes will be subject to the provisions of 10 CFR 50.59.

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FLORIDA POWER CORPORATION
CRYSTAL RIVER UNIT 3
DOCKET NO. 50-302/LICENSE NO. DPR-72
REQUEST NO. 130, REVISION 0
SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

DESCRIPTION OF REQUEST:

This submittal requests an amendment to the Fire Service System Technical Specifications. This amendment is necessary to correct the license due to modifications being performed to comply with 10 CFR 50, Appendix R. Specifically, Fire Service System tables currently in the Technical Specifications will be moved to the Fire Protection Plan to allow timely implementation of operability and surveillance requirements.

This submittal also requests a revision to action statement a. of Specification 3.7.11.4, Fire Hose Stations. This revision requires that the capability to provide backup fire hose protection be demonstrated. Routing equivalent capacity fire hoses from one area to another can cause inoperable fire doors.

SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION:

- (x) Amendment is not likely to involve a significant hazards consideration.
- () Amendment is likely to involve a significant hazards consideration.

BASIS FOR DETERMINATION:

Florida Power Corporation considers this Amendment necessary to comply with facility changes caused by changes in the Regulations.

Florida Power Corporation considers the proposed revision to the Fire Hose Station Action Statement to be administrative.

INSTRUMENTATION

FIRE DETECTION INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.7 As a minimum, the fire detection instrumentation required for protection of safe shutdown equipment in the Control Complex, Auxiliary Building, and Intermediate Building, as specified in the Fire Protection Plan, shall be OPERABLE.

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

ACTION:

With one or more of the fire detection instrument(s), inoperable:

- a. Within 1 hour, establish a fire watch patrol to inspect the zone(s) with the inoperable instrument(s) at least once per hour, and
- b. Restore the inoperable instrument(s) 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 malfunction 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

4.3.3.7.1 Each of the above fire detection instruments shall be demonstrated OPERABLE at least once per 6 months by performance of a CHANNEL FUNCTIONAL TEST.

4.3.3.7.2 The circuitry associated with the detector alarms listed in the Fire Protection Plan shall be demonstrated OPERABLE at least once per 6 months for all National Fire Protection Association (NFPA) Code 72D Class B supervised circuits.

4.3.3.7.3 The non-supervised circuits between the local panels and the control room for the detectors listed in the Fire Protection Plan shall be demonstrated OPERABLE at least once per 31 days.

DELETED

PLANT SYSTEMS

DELUGE AND SPRINKLER SYSTEMS

LIMITING CONDITION FOR OPERATION

3.7.11.2 The deluge and sprinkler systems required for protection of safe shutdown equipment in the Control Complex, Auxiliary Building, and Intermediate Building, as specified in the Fire Protection Plan shall be OPERABLE.

APPLICABILITY: Whenever equipment in the deluge/sprinkler protected areas is required to be OPERABLE.

ACTION:

- a. With one or more of the above required deluge and sprinkler systems inoperable, establish a continuous fire watch with backup fire suppression equipment for the unprotected area(s) within 1 hour; 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 Specification 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.11.2 Each of the above required deluge and sprinkler systems shall be demonstrated OPERABLE:

- a. At least once per 12 months by cycling each testable valve in the flow path through at least one complete cycle of full travel.
- b. At least once per 18 months:
 - l. By performing a system functional test which includes simulated automatic actuation of the system, and:
 - (a) Verifying that the automatic valves in the flow path actuate to their correct positions.

DELETED

PLANT SYSTEMS

FIRE HOSE STATIONS

LIMITING CONDITION FOR OPERATION

3.7.11.4 The fire hose stations required for protection of safe shutdown equipment in the Control Complex, Intermediate Building, Turbine Building, and Auxiliary Building, as specified in the Fire Protection Plan shall be OPERABLE.

APPLICABILITY: Whenever equipment in the areas protected by the fire hose stations is required to be OPERABLE.

ACTION:

- a. With one or more of the fire hose stations inoperable, demonstrate the capability to route an equivalent capacity fire hose to the unprotected area(s) from an OPERABLE hose station within 1 hour.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.11.4 Each of the above fire hose stations shall be demonstrated OPERABLE:

- a. At least once per 31 days by:
 1. Visual inspection of the station to assure all required equipment is at the station, and
- b. At least once per 18 months by:
 1. Removing the hose for inspection and re-racking, and
 2. Replacement of all degraded gaskets in couplings.
- c. At least once per 3 years by:
 1. Partially opening each hose station valve to verify valve OPERABILITY and no flow blockage.
 2. Conducting a hose hydrostatic test at a pressure at least 50 psig greater than the maximum pressure available at that hose station.

DELETED