

3/15/84

Note to: H. Silver

From: J. Gray

SUBJECT: PROPOSED NOTICE OF FIRE PROTECTION AMENDMENTS FOR TMI-1

OELD has been asked to concur in a proposed notice for fire protection license amendments for TMI-1. The amendment would:

- (1) add fire protection equipment to the list of equipment requiring surveillance;
- (2) add administrative controls on the fire detection and suppression system;
- (3) revise surveillance requirements on the Co₂ system in the cable spreading room to conform to system capabilities
- (4) revise surveillance requirements on fire suppression systems in the air intake tunnel to eliminate deluge system operability when halon systems are inoperable.

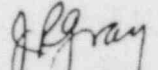
There are some problems with the proposed basis for the NSHC finding on several of these changes.

As a basis for finding NSHC for item (2), the notice indicates that example (vi) of examples of actions not likely to involve SHC applies. Example (vi) is a change that may increase the probability/consequences of an accident or reduce a safety margin but the results of the change are within acceptable criteria in the Standard Review Plan (SRP). You attempt to show that example (vi) is applicable to item (2) by noting that the SRP indicates that use of the Standard Technical Specifications is acceptable and indicating that item (2) would modify administrative controls to conform to the Standard Technical Specifications. I believe that this approach really stretches things to make item (2) fit example (vi). The fact that the SRP says that use of the Standard Technical Specifications is acceptable does not mean that the Standard Tech. Specs. constitute "acceptable criteria in the Standard Review Plan." If they did, then any license change conforming Tech. Specs. to the Standard Tech. Specs. would always fall within example (vi) (and thus involve NSHC), even if the license change otherwise significantly reduces a safety margin, significantly increases the probability/consequences of an accident or creates a new accident. In fact, as the notice describes item (2) (adds administrative controls), it appears that item (2) is a change imposing new restrictions. If that is the case, then item (2) falls under Commission example (ii) of actions not likely to involve SHC and that should be the basis for finding NSHC. If that is

not the case, then you need to show how the item (2) changes do not significantly increase the probability/consequences of accidents, significantly decrease a safety margin, or create a new accident.

While you give some reasons why the changes in items (3) and (4) are acceptable, there is no clear relationship between those reasons and the conclusory assertion that "[t]herefore, Changes 3 and 4 above would not" significantly increase the probability/consequences of an accident, create a new accident or significantly reduce a safety margin. I believe that to provide an adequate basis for a NSHC finding for items (3) and (4), you must specifically, for each of those items, show how the NSHC criteria of 10 CFR § 50.92 are met. For example, for item (4), show how elimination of the requirement of deluge system operability when the halon system is inoperable will neither increase the probability of an accident nor significantly increase the consequences of an accident (fire), will not create the possibility of a new accident, and will not significantly reduce existing margins of safety.

Because of the problems noted above in the bases for the NSHC finding for the license changes represented by items (2), (3) and (4), I am not prepared to concur in the notice as presently constituted.


D.R. Gray

cc: J. Scinto
J. Goldberg
R. Rawson