

DESCRIPTION OF THE PROPOSED TECHNICAL SPECIFICATION REVISIONS
(References to the existing Specifications are in parenthesis)

INDEX - FIRE PROTECTION

Index, Page vii, 3/4.7.9	Revised page numbers and added Hydrant Hose Houses.
Index, Page vii, 3/4.7.10	Revised title from Penetration Fire Barriers to Fire Barriers and revised page number.
Index, Page xii, Bases 3/4.7.10	Revised title from Penetration Fire Barriers to Fire Barriers.

3/4.3.3.8 - FIRE DETECTION INSTRUMENTATION

LIMITING CONDITION FOR OPERATION (LCO)

3.3.3.8
(3.3.3.8) Defined the applicable detectors and deleted the reference to Table 3.3-14.

APPLICABILITY:
(APPLICABILITY) Revised to read: "At all times."

ACTION:
(ACTION) Deleted requirement for reporting and restoration time; defined inaccessible areas and added the main steam line areas as a new fire area and inaccessible area; added an alternate compensatory action for inoperable detectors in accessible areas; and deleted reference to Table 3.3-14 and included reference to plant procedures to identify detectors allowed inoperable.

SURVEILLANCE REQUIREMENTS

4.3.3.8.1
(4.3.3.8.1) Specified those areas considered to be inaccessible.

4.3.3.8.2
(4.3.3.8.2) Increased the applicability of the surveillance to all detector alarm supervised circuits by deleting "NFPA Code 72D Class A" as a modifier to circuit supervision and added that operability will be demonstrated by a Channel Functional Test.

4.3.3.8.3
(4.3.3.8.3) Clarified the applicable non-supervised circuits and added that operability will be demonstrated by performance of a Channel Functional Test.

Footnote Revised to indicate deleted pages.

Deletion (Table 3.3-14) Deleted Table 3.3-14 since the LCO defines the applicable detectors and plant procedures will identify those detectors allowed inoperable.

3/4.3.3.9 (Page 3/4 3-57) - RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

Footnote Revised to indicate deleted pages.

3/4.7.9.1 (Pages 3/4 7-38 through 3/4 7-41) - FIRE SUPPRESSION SYSTEMS

LIMITING CONDITION FOR OPERATION

3.7.9.1.a (3.7.9.1.a) Clarified wording to describe the fire suppression pumps.

3.7.9.1.b & c (3.7.9.b) Split the old 3.7.9.1.b into two separate statements each referring to one of two fire suppression water supplies and deleted redundant requirements for minimum volume.

3.7.9.1.d & e (3.7.9.1.c) Split the old 3.7.9.1.c into separate statements referring to the distribution piping and the sectionalizing valves; added the first valve ahead of the water alarm device for the hydrants.

ACTION: (ACTION) Reformatted for clarify; added compensatory measures to be taken for inoperable water supplies, fire pumps and the remaining suppression systems; and deleted reporting requirements.

SURVEILLANCE REQUIREMENTS

General Reformatted for clarity.

4.7.9.1.1 (4.7.9.1.1.a) Revised to specifically address the Fire Water Storage Tank, to clarify the operable volume and level of the tank and to add an operability requirement for the tank water temperature.

4.7.9.1.2 (4.7.9.1.1.a) Added to clarify the operability requirement of the Ultimate Heat Sink based on level.

4.7.9.1.3.a (4.7.9.1.1.c) Clarified the types of applicable valves to be manual and sectionalizing valves; deleted the words "that is accessible" since the fire water suppression valves are accessible.

4.7.9.1.3.c (4.7.9.1.1.e) Deleted that the word "testable" since there are no Davis-Besse fire water suppression valves that are not testable and excluded check valves.

- 4.7.9.1.4.a
(4.7.9.1.1.b) Revised the test frequency of the electric motor fire pump from a Staggered Test Basis to once every 31 days.
- 4.7.9.1.4.b
(4.7.9.1.1.f.4) Revised to describe the automatic starting method of the electric motor fire pump rather than to sequentially start with the diesel driven fire pump, and to correct the operable system pressure from a maximum to a minimum.
- 4.7.9.1.4.c
(4.7.9.1.1.f.2) Revised to verify operability of the electric motor fire pump based on three points of a test curve.
- 4.7.9.1.4.c
(4.7.9.1.1.b &
4.7.9.1.2.a.2) Revised diesel driven fire pump operating time from 20 to 30 minutes.
- 4.7.9.1.5.b
(4.7.9.1.2.a.1) Revised to clarify an operable Fire Pump Diesel Day Tank based on level.
- 4.7.9.1.5.c
(4.7.9.1.2.b) Clarified that the fuel storage tank is the Diesel Oil Storage Tank 1-1.
- 4.7.9.1.5.d
(4.7.9.1.1.f.4) Revised to describe the three automatic starting methods of the diesel driven fire pump, rather than to sequentially start with the electric motor fire pump, and to correct the operable system pressure from a maximum to a minimum.
- 4.7.9.1.5.e
(4.7.9.1.1.f.2) Revised to verify operability of the diesel driven fire pump based on three points of a test curve.
- Deletion
(4.7.9.1.2.c.2) Deleted the redundant requirement for an 18-month start test of the diesel driven fire pump since the test would be performed every 31 days in accordance with 4.7.9.1.5.a.
- Deletion
(4.7.9.1.1.f.2) Deleted the operability requirement for an 18-month start are not testable since there are no such valves at Davis-Besse.
- Deletion
(4.7.9.1.1.f,
4.7.9.1.1.f.1
and
4.7.9.1.1.f.2) Deleted the redundant requirement for a functional test since there are no such valves on the system and the pumps are tested per Technical Specifications 4.7.9.1.4 and 4.7.9.1.5.

3/4.7.9.2 (Pages 3/4 7-42 through 3/4 7-43) - SPRAY AND/OR SPRINKLER SYSTEMS

LIMITING CONDITION FOR OPERATION

- 3.7.9.2
(3.7.9.2) Revised to define the applicable spray and sprinkler systems; replaced "and/or" with "and"; and deleted the specific lists of systems since these will be identified by plant procedures.

APPLICABILITY: Revised to read: "At all times."
(APPLICABILITY)

ACTION: Reformatted for clarity; revised compensatory measures to
(ACTION) require a backup suppression system and either a continuous
fire watch or verified fire detectors with an hourly fire
patrol; however, the backup suppression is not required
for the water curtain deluge systems; deleted reporting
requirements.

SURVEILLANCE REQUIREMENTS

General	Reformatted for clarity.
4.7.9.2 (4.7.9.2)	Replaced "and/or" with "and".
4.7.9.2.a (None)	Added this requirement to verify valve position once per 31 days.
4.7.9.2.b (4.7.9.2.a)	Deleted the word "testable" since there are no sprinkler system valves that are not testable and revised to exclude check valves.
4.7.9.2.c (4.7.9.2.b.1)	Revised to exclude check valves.
4.7.9.2.d (None)	Added this requirement to inspect spray and sprinkler header integrity every 18 months.
4.7.9.2.e (None)	Added this requirement to inspect spray area to ensure spray pattern is not obstructed every 18 months.
4.7.9.2.f (4.7.9.2.b.2)	Clarified inspection to be visual.
4.7.9.2.g (None)	Added this requirement to perform an air-flow test on each open head header and to verify they are unobstructed every three years.
Deletion (4.7.9.2.b.1.b)	Deleted the requirement to cycle valves that are not testable since there are no such valves at Davis-Besse.

3/4.7.9.3 (Page 3/4 7-44) - FIRE HOSE STATIONS

LIMITING CONDITION FOR OPERATION

3.7.9.3 Defined the applicable fire hose stations and deleted the
(3.7.9.3) reference to Table 3.7-4.

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APPLICABILITY: Revised to read: "At all times."
(APPLICABILITY)

ACTION a: Deleted reference to Table 3.7-4 and revised to require a
(ACTION a) backup suppression system with signs rather than an
additional fire hose.

SURVEILLANCE REQUIREMENTS

General Reformatted for clarity.

4.7.9.3 Deleted reference to Table 3.7-4.
(4.7.9.3)

4.7.9.3.a Clarified "station" as "fire hose station."
(4.7.9.3.a)

4.7.9.3.b Added to verify that each valve, except check valves,
(None) is in the correct position.

4.7.9.3.c Clarified that the inspection is visual and verifies
(4.7.9.3.b.1) integrity.

4.7.9.3.d Clarified that the inspection is a visual inspection and
(4.7.9.3.b.2) revised wording for clarity.

4.7.9.3.e Revised to clarify that valve operability is verified by
(4.7.9.3.c.1) valve movement.

Deletion Deleted Table 3.7-4 since the LCO defines the fire hose
(Table 3.7-4) stations which will be identified by plant procedures.

3/4.7.9.4 (Page 3/4 7-45) - HYDRANTS AND HYDRANT HOSE HOUSES

This is a completely new Technical Specification that addresses hydrant and hydrant hose houses provided to protect redundant safe shutdown equipment required in the event of a fire.

3/4.7.9.10 (Pages 3/4 7-46 through 3/4 7-47) - FIRE BARRIERS

Title Revised from "Fire Barrier Penetrations" to "Fire Barriers."

3.7.10 Revised to clarify the equipment protected by the fire
(3.7.10) barrier and to increase the barriers addressed by the
Technical Specification.

ACTION a: Reformatted for clarify and deleted the reporting require-
(ACTION a) ments.

SURVEILLANCE REQUIREMENTS

- 4.7.10 Revised to include sealing devices.
(4.7.10)
- 4.7.10.a Revised to clarify the scope of the visual inspection of
(4.7.10.a) certain fire barriers and added the requirement to perform
an evaluation to verify the operability of the questionable
barrier.
- 4.7.10.b Revised to clarify the scope of the visual inspection of
(4.7.10.a) fire doors and dampers and added the requirement to
perform an evaluation to verify the operability of the
questionable barrier.
- Footnote Added this footnote to exempt certain barriers from the
(None) visual inspection due to ALARA considerations.
- 4.7.10.c Revised to clarify the scope of the visual inspection of
(4.7.10.a) sealed penetrations; added the requirement to perform an
evaluation to verify the operability of the questionable
barrier and to continue the inspection for an additional
barrier sample; and limited the scope of the inspection to
10 percent of the penetrations each surveillance interval.
- 4.7.10.d Added this requirement to verify every 24 hours that
(None) unlocked fire doors are closed and that fire doors with
automatic hold-open and release mechanisms are free from
obstructions.
- 4.7.10.e Added to verify that each locked fire door is closed and
(None) locked every seven days.
- 4.7.10.f Added to perform every 18 months a functional test of the
(None) automatic hold-open and release mechanisms and the latch
and closing mechanisms.
- Deletion Deleted the redundant requirement to perform a visual
(4.7.10.b) inspection of a penetration fire barrier prior to
returning the barrier to operable since any component
addressed by a surveillance requirement, not just fire
barriers, can only be returned to operability by perform-
ance of the surveillance requirement in accordance with
4.0.4 (see basis).

BASES 3/4.3.3.8 (Page B 3/4 3-3) - FIRE DETECTION INSTRUMENTATION

- 1st Paragraph Changed the words "safety related equipment" to "safe
shutdown equipment required in the event of a fire."

- 2nd Paragraph Changed the words "the establishment of frequent fire patrols in the affected areas" to "monitoring the affected areas."
- 3rd Paragraph Added a statement that the Action Statements are also applicable to those detectors that actuate fire suppression and water curtain deluge systems.

BASES 3/4.7.9 (Page B 3/4 7-6) - FIRE SUPPRESSION SYSTEMS

- 1st Paragraph Changed the words "in any portion of the facility where safety related equipment is located" to "those portions of the facility containing redundant safe shutdown equipment required in the event of a fire"; added the yard fire hydrants to the scope of the fire suppression system; and changed the words "to minimize potential damage to safety related equipment" to "to minimize potential damage to redundant safe shutdown equipment required in the event of a fire."
- 2nd Paragraph Changed the words "alternate backup fire fighting equipment is required to be made available in the affected areas" to "compensatory measures are required" and added a discussion of what constitutes a backup fire suppression system as specified by Specifications 3.7.9.1, 3.7.9.2, 3.7.9.3 and 3.7.9.4.
- 3rd Paragraph Added a statement that the water curtain deluge systems are barriers and not suppression systems but that the Action Statements for the suppression systems are adequate for the deluge systems.
- Deletion Deleted the discussion regarding the immediate corrective actions for the fire water suppression system and the 24-hour reporting requirements.

BASES 3/4.7.10 (Page 3/4 7-6 through B 3/4 7-7) - FIRE BARRIERS

- Title Revised from Penetration Fire Barriers to Fire Barriers
- 1st Paragraph Revised the words "penetration fire barriers" to "fire barrier"; revised the words "adjacent portions of the facility" to "adjacent fire areas or to portions of redundant safe shutdown systems required in the event of a fire within the fire area"; and revised the words "involving several areas of the facility" to "involving several fire areas of the facility".

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2nd Paragraph Added a statement that the visual inspection is a verification of the as-designed condition and that an evaluation is to verify that the barrier is operable not degraded.

3rd Paragraph Deleted statement regarding the compensatory measures to be taken with an inoperable barrier since the application of the ACTION is addressed by Specification 3.0.2.

6.4 (Page 6-5) - TRAINING

6.4.2 Deleted the requirement that the Fire Brigade training
(6.4.2) program meet or exceed the requirement of Section 27 of the NFPA Code-1976 and revised the requirement that the Fire Brigade Training Program is under the direction of the Nuclear Training Director rather than the Fire Marshall.

6.9.2 (Page 6-18) - SPECIAL REPORTS

6.9.2 Deleted the requirement for Specifications 3.3.3.8,
(6.9.2) 3.7.9.1, 3.7.9.2 and 3.7.10 (Items e, f and g) and re-alphabetized the remaining items requiring special reports.

SAFETY EVALUATION

INTRODUCTION AND SYSTEMS AFFECTED

This safety evaluation addresses proposed revisions to the following sections of the Davis-Besse Nuclear Power Station, Unit No. 1 Operating License, Appendix A, Technical Specifications:

INDEX	Fire Suppression Systems and Fire Barriers
3/4.3.3.8	Fire Detection Instrumentation
3/4.3.3.9	Radioactive Liquid Effluent Monitoring Instrumentation
3/4.7.9.1	Fire Suppression Water Systems
3/4.7.9.2	Spray and/or Sprinkler Systems
3/4.7.9.3	Fire Hose Stations
3/4.7.9.4	Hydrants and Hydrant Hose Houses
3/4.7.10	Fire Barriers
B 3/4.3.3.8	Fire Detection Instrumentation
B 3/4.7.9	Fire Suppression Systems
B 3/4.7.10	Fire Barriers
6.4	Training
6.9.2	Special Reports

FUNCTION OF SYSTEMS

The function of the fire detection instrumentation is to provide adequate warning capability for prompt detection of fires in their early stages in order to reduce the potential for damage to redundant safe shutdown equipment required in the event of a fire. The Davis-Besse fire detection instrumentation addressed by this proposed revision to the Technical Specifications consists of smoke and heat detectors.

The function of the fire suppression systems is to confine and extinguish fires in those portions of the facility containing redundant safe shutdown equipment required in the event of a fire. The fire suppression systems at Davis-Besse consist of water systems, sprays and/or sprinklers, fire hose stations and yard fire hydrants.

The function of fire barriers is to confine or adequately retard fires from spreading to adjacent fire areas of the facility or to portions of redundant safe shutdown systems required in the event of a fire within the fire area. The fire barriers at Davis-Besse consist of fire-rated walls, floors and ceilings, electrical raceway enclosures, structural steel fire-proofing, fire doors, fire dampers and penetrations seals.

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REFERENCES

- Davis-Besse Nuclear Power Station, Unit No. 1 Operating License, Appendix A, Technical Specifications
- Davis-Besse Nuclear Power Station, Unit No. 1, Updated Safety Analysis Report, June 1986
- NRC Generic Letter 86-10, Implementation of Fire Protection Requirements, dated April 24, 1986 (Log No. 1983)
- Facility Change Request (FCR) No. 86-0163, Revision A, Fire Detection
- NUREG-0103, Revision 4, Standard Technical Specifications for Babcock and Wilcox Pressurized Water Reactors
- Palo Verde, Unit 1, Technical Specifications, Amendment No. 0
- Fermi, Unit No. 2, Technical Specifications, Amendment No. 0
- Rancho Seco, Unit No. 1, Technical Specifications, Proposed Amendment No. 137
- Gilbert-Commonwealth letters dated December 31, 1985 and August 21, 1986, Fire Detection Project
- Davis-Besse Appendix R Compliance Assessment Report, Revision 1
- Davis-Besse Fire Hazard Analysis Report, Revision 7
- Davis-Besse Fire Protection Strategy Procedures

DESCRIPTION OF CHANGES

The proposed changes to the Technical Specifications are administrative in nature, provide more stringent requirements or reflect the actual plant design and fire protection program based on actual or planned plant configuration and fire protection analyses. Examples of the administrative changes include reformatting the Action Statements and Surveillance Requirements, page number revisions, and clarification of specific equipment addressed by the proposed Technical Specifications. Examples of the more stringent requirements include the addition of Action Statements and Surveillance Requirements. Examples of changes that reflect the actual plant design and fire protection program include revising the scope of the Technical Specifications to address safe shutdown equipment required in the event of a fire and defining inaccessible equipment.

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The need to limit fire damage to systems required to achieve and maintain safe shutdown conditions in post-fire conditions is greater than the need to limit fire damage to those systems required to mitigate the consequences of design basis accidents since the loss of the design-basis-accident systems in post-fire conditions does not per se impact public safety. Consequently, those systems required to achieve and maintain safe shutdown conditions in post-fire conditions, rather than safety-related equipment, have been identified and evaluated for its availability in the event of a fire as documented in the Davis-Besse Appendix R Compliance Assessment Report (CAR). That equipment necessary to achieve and maintain safe shutdown conditions in post-fire conditions is termed in the proposed Technical Specification revisions as safe shutdown equipment required in the event of a fire. The proposed Section 3/4 Technical Specifications refer to that fire protection equipment that protects redundant safe shutdown equipment required in the event of a fire.

The fire protection equipment addressed by the proposed Technical Specification revision consists of fire barriers, detection instrumentation and water suppression systems. The fire barriers for each fire area identified in the CAR are addressed by the proposed Technical Specification revision since these barriers separate redundant safe shutdown equipment. The fire detection instruments and water suppression systems for only those fire areas containing redundant safe shutdown equipment are addressed by the proposed Technical Specification revision since these systems are intended to protect the redundant safe shutdown systems within the fire areas. Those CAR fire areas that do not contain redundant safe shutdown equipment required in the event of a fire or contain only equipment which could prevent operation or cause spurious operation of safe shutdown equipment required in the event of a fire are not considered to require the protection of the fire protection equipment addressed by the proposed Technical Specification revisions. This is justified since a fire in those fire areas would not damage redundant equipment that is necessary to achieve safe shutdown in the event of a fire and since means have been identified in the CAR to preclude spurious operation.

Toledo Edison intends to implement the guidance of NRC Generic Letter 86-10 which requests that the Fire Protection Program and major commitments made in Operating Licenses and Technical Specifications be deleted and referred to in the Updated Safety Analysis Report (USAR). However, Toledo Edison anticipates that the NRC will desire the Technical Specification commitments to be transferred to the USAR without change. Therefore, the proposed revisions to the Technical Specifications were developed in order to reflect the current plant design, testing and compensatory measures considered to be adequate and practical.

These proposed Technical Specification revisions were developed considering the current Davis-Besse plant design, recent audit findings, the B&W and Westinghouse Standard Technical Specifications (STS) and Technical Specifications of recently licensed nuclear plants. The proposed revision to the Technical Specifications reflects the design of the plant to satisfy the National Fire Protection Association codes, to avoid a future Technical Specification revision upon completion of the FCR, and to provide an appropriate means for ensuring compensatory measures are maintained for those CAR fire areas not in accordance with the previous Toledo Edison commitments.

UNREVIEWED SAFETY QUESTIONS

The proposed changes are administrative in nature, provide more stringent requirements or reflect the actual plant design and fire protection program based on actual or planned plant configuration and fire protection analyses. Implementation of these proposed changes would not:

1. Increase the probability of occurrence or the consequence of an accident or malfunction of equipment important to safety previously evaluated in the Safety Analysis Report (10CFR50.59(a)(2)(i)).

The proposed administrative changes would not increase the occurrence or consequence of an accident or malfunction of equipment previously evaluated because these changes would not affect the function, operation (including operational setpoints or parameters) or failure mode analysis of any system as described in the USAR.

The proposed changes that provide more stringent requirements would not increase the occurrence or consequence of an accident or malfunction of equipment previously evaluated because these changes would increase the scope of the Technical Specifications, add restrictions, establish increased test frequencies and add Surveillance Requirements.

The proposed changes that reflect the actual plant design and fire protection program would not increase the occurrence or consequence of an accident or malfunction of equipment previously evaluated because the collective capability of the fire protection equipment and fire protection program has been increased based on plant modifications, administrative and procedure enhancements, and fire protection analysis in accordance with the requirements of 10CFR50, Appendices A (General Design Criterion 3) and R.

2. Create the possibility for an accident or malfunction of a different type than any evaluated previously in the Safety Analysis Report (10CFR50.59(a)(2)(ii)).

The proposed administrative changes would not create the possibility for an accident or malfunction of a different type than any previously evaluated because these changes would not affect the function, operation (including operational setpoints or parameters) or failure mode analysis of any system as described in the USAR.

The proposed changes that provide more stringent requirements would not create the possibility of an accident or malfunction of a different type than any previously evaluated because these changes would increase the scope of the Technical Specifications, add restrictions, establish increased test frequencies and add Surveillance Requirements.

The proposed changes that reflect the actual plant design and fire protection program would not create the possibility of an accident or malfunction of a different type than any previously evaluated because the collective capability of the fire protection equipment and fire protection program has been increased based on plant modifications, administrative and procedure enhancements, and fire protection analysis in accordance with the requirements of 10CFR50, Appendices A (General Design Criterion 3) and R.

3. Reduce the margin of safety as defined in the basis for any Technical Specification (10CFR50.59(a)(2)(iii)).

The proposed administrative changes would not reduce the margin of safety because these changes would not affect the function, operation (including operational setpoints or parameters) or failure mode analysis of any system as described in the USAR.

The proposed changes that provide more stringent requirements would not reduce the margin of safety because these changes would increase the scope of the Technical Specifications, add restrictions, establish increased test frequencies and add Surveillance Requirements.

The proposed changes that reflect the actual plant design and fire protection program would not reduce the margin of safety because the collective capability of the fire protection equipment and fire protection program has been increased based on plant modifications, administrative and procedure enhancements, and fire protection analysis in accordance with the requirements of 10CFR50, Appendices A (General Design Criterion 3) and R.

CONCLUSION

Based on the above evaluation, it is determined that the proposed Technical Specification revision does not involve an unreviewed safety question.

SIGNIFICANT HAZARDS CONSIDERATION

INTRODUCTION AND SYSTEMS AFFECTED

This License Amendment Request proposes revisions to the following sections of the Davis-Besse Nuclear Power Station, Unit No. 1 Operating License, Appendix A, Technical Specifications:

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3/4.7.9.4	Hydrants and Hydrant Hose Houses
3/4.7.10	Fire Barriers
B 3/4.3.3.8	Fire Detection Instrumentation
B 3/4.7.9	Fire Suppression Systems
B 3/4.7.10	Fire Barriers
6.4	Training
6.9.2	Special Reports

FUNCTION OF SYSTEMS

The function of the fire detection instrumentation is to provide adequate warning capability for prompt detection of fires in their early stages in order to reduce the potential for damage to redundant safe shutdown equipment required in the event of a fire. The Davis-Besse fire detection instrumentation addressed by this proposed revision to the Technical Specifications consists of smoke and heat detectors.

The function of the fire suppression systems is to confine and extinguish fires in those portions of the facility containing redundant safe shutdown equipment required in the event of a fire. The fire suppression systems at Davis-Besse consist of water systems, sprays and/or sprinklers, fire hose stations and yard fire hydrants.

The function of fire barriers is to confine or adequately retard fires from spreading to adjacent fire areas of the facility or to portions of redundant safe shutdown systems required in the event of a fire within the fire area. The fire barriers at Davis-Besse consist of fire-rated walls, floors and ceilings, electrical raceway enclosures, structural steel fire-proofing, fire doors, fire dampers and penetrations seals.

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REFERENCES

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- Rancho Seco, Unit No. 1, Technical Specifications, Proposed Amendment No. 137
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- Davis-Besse Fire Hazard Analysis Report, Revision 7
- Davis-Besse Fire Protection Strategy Procedures

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The need to limit fire damage to systems required to achieve and maintain safe shutdown conditions in post-fire conditions is greater than the need to limit fire damage to those systems required to mitigate the consequences of design basis accidents since the loss of the design-basis-accident systems in post-fire conditions does not per se impact public safety. Consequently, those systems required to achieve and maintain safe shutdown conditions in post-fire conditions, rather than safety-related equipment, have been identified and evaluated for its availability in the event of a fire as documented in the Davis-Besse Appendix R Compliance Assessment Report (CAR). That equipment necessary to achieve and maintain safe shutdown conditions in post-fire conditions is termed in the proposed Technical Specification revisions as safe shutdown equipment required in the event of a fire. The proposed Section 3/4 Technical Specifications refer to that fire protection equipment that protects redundant safe shutdown equipment required in the event of a fire.

The fire protection equipment addressed by the proposed Technical Specification revision consists of fire barriers, detection instrumentation and water suppression systems. The fire barriers for each fire area identified in the CAR are addressed by the proposed Technical Specification revision since these barriers separate redundant safe shutdown equipment. The fire detection instruments and water suppression systems for only those fire areas containing redundant safe shutdown equipment are addressed by the proposed Technical Specification revision since these systems are intended to protect the redundant safe shutdown systems within the fire areas. Those CAR fire areas that do not contain redundant safe shutdown equipment required in the event of a fire or contain only equipment which could prevent operation or cause spurious operation of safe shutdown equipment required in the event of a fire are not considered to require the protection of the fire protection equipment addressed by the proposed Technical Specification revisions. This is justified since a fire in those fire areas would not damage redundant equipment that is necessary to achieve safe shutdown in the event of a fire and since means have been identified in the CAR to preclude spurious operation.

Toledo Edison intends to implement the guidance of NRC Generic Letter 86-10 which requests that the Fire Protection Program and major commitments made in Operating Licenses and Technical Specifications be deleted and referred to in the Updated Safety Analysis Report (USAR). However, Toledo Edison anticipates that the NRC will desire the Technical Specification commitments to be transferred to the USAR without change. Therefore, the proposed revisions to the Technical Specifications were developed in order to reflect the current plant design, testing and compensatory measures considered to be adequate and practical.

These proposed Technical Specification revisions were developed considering the current Davis-Besse plant design, recent audit findings, the B&W and Westinghouse Standard Technical Specifications (STS) and Technical Specifications of recently licensed nuclear plants. The proposed revision to the Technical Specifications reflects the design of the plant to satisfy the National Fire Protection Association codes, to avoid a future Technical Specification revision upon completion of the FCR, and to provide an appropriate means for ensuring compensatory measures are maintained for those CAR fire areas not in accordance with the previous Toledo Edison commitments.

SIGNIFICANT HAZARDS CONSIDERATION

The proposed changes are administrative in nature, provide more stringent requirements or reflect the actual plant design and fire protection program based on actual or planned plant configuration and fire protection analyses. Implementation of these proposed changes would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated (10CFR50.92(c)(1)).

The proposed administrative changes would not increase the probability or consequence of an accident previously evaluated because these changes would not affect the function, operation (including operational setpoints or parameters) or failure mode analysis of any system as described in the USAR.

The proposed changes that provide more stringent requirements would not increase the probability or consequence of an accident previously evaluated because these changes would increase the scope of the Technical Specifications, add restrictions, establish increased test frequencies and add Surveillance Requirements.

The proposed changes that reflect the actual plant design and fire protection program would not increase the probability or consequence of an accident previously evaluated because the collective capability of the fire protection equipment and fire protection program has been increased based on plant modifications, administrative and procedure enhancements, and fire protection analysis in accordance with the requirements of 10CFR50, Appendices A (General Design Criterion 3) and R.

2. Create the possibility of a new or different kind of accident from any previously evaluated (10CFR50.92(c)(2)).

The proposed administrative changes would not create the possibility for an accident of a different type than any previously evaluated because these changes would not affect the function, operation (including operational setpoints or parameters) or failure mode analysis of any system as described in the USAR.

The proposed changes that provide more stringent requirements would not create the possibility of an accident of a different type than any previously evaluated because these changes would increase the scope of the Technical Specifications, add restrictions, establish increased test frequencies and add Surveillance Requirements.

The proposed changes that reflect the actual plant design and fire protection program would not create the possibility of an accident of a different type than any previously evaluated because the collective capability of the fire protection equipment and fire protection program has been increased based on plant modifications, administrative and procedure enhancements, and fire protection analysis in accordance with the requirements of 10CFR50, Appendices A (General Design Criterion 3) and R.

3. Involve a significant reduction in a margin of safety (10CFR50.92(c)(3)).

The proposed administrative changes would not reduce the margin of safety because these changes would not affect the function, operation (including operational setpoints or parameters) or failure mode analysis of any system as described in the USAR.

The proposed changes that provide more stringent requirements would not reduce the margin of safety because these changes would increase the scope of the Technical Specifications, add restrictions, establish increased test frequencies and add Surveillance Requirements.

The proposed changes that reflect the actual plant design and fire protection program would not reduce the margin of safety because the collective capability of the fire protection equipment and fire protection program has been increased based on plant modifications, administrative and procedure enhancements, and fire protection analysis in accordance with the requirements of 10CFR50, Appendices A (General Design Criterion 3) and R.

CONCLUSION

Based on the above evaluation, Toledo Edison has determined that the proposed Technical Specification revision does not involve a significant hazards consideration.

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INSTRUMENTATION

FIRE DETECTION INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.8 As a minimum, the fire detection instrumentation provided to protect redundant safe shutdown equipment required in the event of a fire shall be OPERABLE.

APPLICABILITY: At all times.

ACTION:

With the above required fire detection instruments inoperable, other than those instruments allowed inoperable as identified by plant procedures:

- a. Within 1 hour, establish a fire watch patrol to inspect the zone(s) with the inoperable instrument(s) at least once per hour; except
 - 1) if the instrument(s) is located inside the containment or containment annulus then inspect the zone(s) at least once per 8 hours or monitor the containment air temperature at least once once per hour at the locations listed in Specification 4.6.1.5, or
 - 2) if the instrument(s) is located inside the main steam line rooms (Rooms 600, 601, 601A, 602, 705 and 706) then inspect the zone(s) at least once per 8 hours.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

- 4.3.3.8.1 Each of the above required fire detection instruments that are not located in the containment, containment annulus or the above main steam line rooms shall be demonstrated OPERABLE at least once per 6 months by performance of a CHANNEL FUNCTIONAL TEST. Each of the above required fire detection instruments located in the containment, containment annulus or main steam line areas shall be demonstrated OPERABLE at least once per 18 months by performance of a CHANNEL FUNCTIONAL TEST.
- 4.3.3.8.2 The circuit 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 by performance of a CHANNEL FUNCTIONAL TEST.
- 4.3.3.8.3 The non-supervised circuits that are associated with the detector alarms of each of the above fire detection instruments and routed between the local panels and the control room shall be demonstrated OPERABLE at least once per 31 days by performance of a CHANNEL FUNCTIONAL TEST.

INSTRUMENTATION

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.9 The radioactive liquid effluent monitoring instrumentation channels shown in Table 3.3-15 shall be OPERABLE with their alarm/trip setpoints set to ensure that the limits of Specification 3.11.1.1 are not exceeded. The alarm/trip setpoints of these channels shall be determined and adjusted in accordance with the methodology and parameters in the OFFSITE DOSE CALCULATION MANUAL (ODCM).

APPLICABILITY: At all times.

ACTION:

- a. With a radioactive liquid effluent monitoring instrumentation channel alarm/trip setpoint less conservative than required by the above specification, without delay suspend the release of radioactive liquid effluents monitored by the affected channel, or declare the channel inoperable, or change the setpoint so it is acceptably conservative.
- b. With less than the minimum number of radioactive liquid effluent monitoring instrumentation channels OPERABLE, take the ACTION shown in Table 3.3-15. Exert best efforts to return the instruments to OPERABLE status within 30 days and, if unsuccessful, explain in the next Semiannual Radioactive Effluent Release Report why the inoperability was not corrected in a timely manner.
- c. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.9 Each radioactive liquid effluent monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK, SOURCE CHECK, CHANNEL CALIBRATION AND CHANNEL FUNCTIONAL TEST operations at the frequencies shown in Table 4.3-15.

PLANT SYSTEMS

3/4.7.9 FIRE SUPPRESSION SYSTEMS

FIRE SUPPRESSION WATER SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.9.1 The fire suppression water system shall be OPERABLE with:

- a. Two OPERABLE fire suppression pumps with their discharge aligned to the fire suppression header,
- b. An OPERABLE Ultimate Heat Sink,
- c. An OPERABLE Fire Water Storage Tank,
- d. An OPERABLE flow path capable of taking suction from the Ultimate Heat Sink and the Fire Water Storage Tank and transferring water through distribution piping to the yard fire hydrant curb valves, and
- e. OPERABLE sectionalizing valves in distribution piping to the yard fire hydrant curb valves and the first valve ahead of the water flow alarm device on each spray and sprinkler, fire hose station and yard fire hydrant required to be OPERABLE per Specifications 3.7.9.2, 3.7.9.3 and 3.7.9.4.

APPLICABILITY: At all times.

ACTION:

- a. With the fire suppression water system inoperable, within 24 hours establish a backup fire suppression water system as required by plant procedures, except:
 1. With either the Fire Water Storage Tank or the Ultimate Heat Sink inoperable, verify the OPERABILITY of the alternate water supply within 1 hour and every 24 hours thereafter.
 2. With either one of the fire pumps inoperable, verify the OPERABILITY of the alternative pump within 24 hours and every 7 days thereafter.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

- 4.7.9.1.1 The Fire Water Storage Tank shall be demonstrated OPERABLE:
- a. By verifying the available water supply is at least 250,000 gallons (water level of at least 30 feet) at least once per 7 days.
 - b. By verifying the temperature of the contained water supply is greater than 35°F every 24 hours during October through March.
- 4.7.9.1.2 The Ultimate Heat Sink shall be demonstrated OPERABLE at least once per 7 days by verifying its water level is at or above 562.0 feet International Great Lakes Datum.
- 4.7.9.1.3 The fire suppression water system shall be demonstrated OPERABLE:
- a. At least once per 31 days by verifying that each manual valve and sectionalizing valve in the flow path is in its correct position.
 - b. At least once per 12 months by performance of a system flush.
 - c. At least once per 12 months by cycling each valve in the flow path, excluding check valves, through at least one complete cycle of full travel.
 - d. At least once per 3 years by performing a flow test of the system in accordance with Chapter 5, Section 11 of the Fire Protection Handbook, 14th Edition, published by the National Fire Protection Association.
- 4.7.9.1.4 The electric motor driven fire pump shall be demonstrated OPERABLE:
- a. At least once per 31 days by starting the electric motor driven fire pump and operating for at least 15 minutes in recirculation flow.
 - b. At least once per 18 months by verifying the electric motor driven fire pump starts automatically on a decreasing system pressure of at least 115 psig and maintains the fire suppression water system pressure greater than 95 psig.

SURVEILLANCE REQUIREMENTS

- c. At least once per 18 months by verifying the electric motor driven fire pump develops at least 2375 gpm at a system head of 250 feet discharge pressure by recording readings for at least 3 points on a test curve.

4.7.9.1.5 The diesel driven fire pump shall be demonstrated OPERABLE:

- a. At least once per 31 days by starting the diesel driven fire pump from ambient conditions and operating it for at least 30 minutes on recirculation flow.
- b. At least once per 31 days by verifying Fire Pump Diesel Day Tank contains at least 300 gallons of fuel (fuel level of at least 30 inches).
- c. At least once per 92 days by verifying that a sample of diesel fuel from the Diesel Oil Storage Tank 1-1, obtained in accordance with ASTM-D270-65, is within the acceptable limits specified in Table 1 of ASTM-D975-74 when checked for viscosity, water content and sediment.
- d. At least once per 18 months by verifying the diesel driven fire pump starts automatically, from ambient condition on decreasing system pressure of at least 95 psig, decreasing Fire Water Storage Tank level of at least three feet and loss of power to the diesel driven fire pump controller and maintains fire suppression water system pressure greater than 95 psig.
- e. At least once per 18 months by verifying the diesel fire pump develops at least 2375 gpm at a system head of 250 feet discharge pressure by recording readings for at least 3 points on a test curve.
- f. At least once per 18 months, during shutdown, by subjecting the diesel to an inspection in accordance with procedures prepared in conjunction with its manufacturer's recommendations for the class of service.
- g. At least once per 7 days by verifying that the electrolyte level of each diesel driven fire pump starting battery is above the plates.
- h. At least once per 7 days by verifying the overall voltage of the diesel driven fire pump battery bank when not discharging is greater than or equal to 24 volts.

SURVEILLANCE REQUIREMENTS

- i. At least once per 92 days by verifying that the specific gravity of each diesel driven fire pump starting battery is appropriate for continued service of the battery.
- j. At least once per 18 months by verifying that the diesel driven fire pump starting batteries, cell plates and battery racks show no visual indication of physical damage or abnormal deterioration.
- k. At least once per 18 months by verifying that the battery-to-battery and terminal connections of each diesel driven fire pump starting battery are clean, tight, free of corrosion and coated with anti-corrosion material.

PLANT SYSTEMS

SPRAY AND/OR SPRINKLER SYSTEMS

LIMITING CONDITION FOR OPERATION

3.7.9.2 The spray and sprinkler systems provided to protect redundant safe shutdown equipment required in the event of a fire shall be OPERABLE.

APPLICABILITY: At all times.

ACTION:

- a. With one or more of the above required spray and sprinkler systems inoperable, other than a water curtain deluge system(s), within 1 hour establish a backup fire suppression system as required by the plant procedures and either:
 1. Establish a continuous fire watch in the unprotected fire zone(s), or
 2. Verify the OPERABILITY of the fire detectors in the unprotected fire zone(s) and establish an hourly fire watch patrol.
- b. With one or more of the above required water curtain deluge systems inoperable, within 1 hour either:
 1. Establish a continuous fire watch on at least one side of the affected fire barrier, or
 2. Verify the OPERABILITY of the fire detectors on at least one side of the affected fire barrier and establish an hourly fire watch patrol.
- c. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

- 4.7.9.2 Each of the above required spray and sprinkler systems shall be demonstrated OPERABLE:
- a. At least once per 31 days by verifying that each manual and automatic valve, excluding check valves, in the flow path is in its correct position.
 - b. At least once per 12 months by cycling each valve, excluding check valves, in the flow path through at least one complete cycle of full travel.

SURVEILLANCE REQUIREMENTS

- c. At least once per 18 months by performing a system functional test which includes simulated automatic actuation of the system and verifying that the automatic valves in the flow path, excluding check valves, actuate to their correct positions.
- d. At least once per 18 months by a visual inspection of the dry-pipe spray and sprinkler headers to verify their integrity.
- e. At least once per 18 months by a visual inspection of each nozzle's spray area to verify the spray pattern is not obstructed.
- f. At least once per 18 months by a visual inspection of each nozzle to verify no blockage.
- g. At least once per 3 years by performing an air-flow test through each open head spray header and verifying each open head spray nozzle is unobstructed.

PLANT SYSTEMS

FIRE HOSE STATIONS

LIMITING CONDITION FOR OPERATION

3.7.9.3 The Fire Hose Stations provided to protect redundant safe shutdown equipment required in the event of a fire shall be OPERABLE.

APPLICABILITY: At all times.

ACTION:

- a. With one or more of the above required fire hose stations inoperable, within 1 hour provide a backup suppression system as required by plant procedures.

Signs identifying the purpose and location of the backup suppression system shall be mounted with the backup suppression system and at the inoperable fire hose station.

- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

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

- a. At least once per 31 days by a visual inspection of each fire hose station to assure all required equipment is at the station.
- b. At least once per 31 days by verifying that each valve, excluding check valves, in the flow path is in its correct position.
- c. At least once per 18 months by removing each hose and visually verifying its integrity and re-racking.
- d. At least once per 18 months by inspecting all gaskets and replacing any degraded gaskets in the couplings.
- e. At least once per 3 years by partially opening each hose station valve to verify valve movement and no flow blockage.
- f. At least once per 3 years by conducting a hose hydrostatic test at a pressure at least 50 psig greater than the maximum pressure available at that hose station.

PLANT SYSTEMS

HYDRANTS AND HYDRANT HOSE HOUSES

LIMITING CONDITION FOR OPERATION

- 3.7.9.4 The yard fire hydrants and associated hydrant hose houses provided to protect redundant safe shutdown equipment required in the event of fire shall be OPERABLE.

APPLICABILITY: At all times.

ACTION:

- a. With one or more of the above required yard fire hydrants and/or associated hydrant hose houses inoperable, within 1 hour establish a backup fire suppression system as required by plant procedures.

Signs identifying the purpose and location of the backup fire suppression system shall be mounted with the backup suppression system and at the inoperable hydrant(s) and associated hose house(s).

- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

- 4.7.9.4 Each of the above required yard fire hydrants and associated hydrant hose houses shall be demonstrated OPERABLE:
- a. At least once per 31 days by visual inspection of the hydrant hose house to assure all required equipment is at the hose house.
- b. At least once per 6 months (once during March, April or May and once during September, October or November) by visually inspecting each yard fire hydrant and verifying that the hydrant barrel is dry and that the hydrant is not damaged.
- c. At least once per 12 months by:
1. Conducting a hose hydrostatic test at a pressure at least 50 psig greater than the maximum pressure available at that yard fire hydrant.
 2. Inspecting all the gaskets and replacing any degraded gaskets in the couplings.
 3. Performing a flow check of each hydrant.

PLANT SYSTEMS

3/4.7.10 FIRE BARRIERS

LIMITING CONDITION FOR OPERATION

3.7.10 All fire barriers separating portions of redundant safe shutdown systems required in the event of a fire shall be OPERABLE.

APPLICABILITY: At all times.

ACTION:

- a. With one or more of the above fire barriers inoperable, within 1 hour, either:
 1. Establish a continuous fire watch on at least one side of the affected fire barrier, or
 2. Verify the OPERABILITY of the fire detectors on at least one side of the affected fire barrier and establish an hourly fire watch patrol.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

- 4.7.10 Each of the above required fire barriers, including sealing devices, shall be verified OPERABLE by:
- a. Performing a visual inspection of the exposed surfaces of each fire-rated wall*, floor and ceiling, electrical raceway fire enclosure and structural steel fire-proofing at least once per 18 months. If visually apparent adverse changes in appearance or changes from the as-built condition are found, perform an evaluation to determine whether the fire barrier(s) is OPERABLE; otherwise, declare the fire barrier(s) inoperable following completion of the evaluation.
 - b. Performing a visual inspection of each fire door, fire damper and associated hardware at least once per 18 months. If visually apparent adverse changes in appearance or changes from the as-built condition are found, perform an evaluation to determine whether the fire barrier is not degraded and that the barrier(s) is OPERABLE; otherwise, declare the fire barrier(s) inoperable following completion of the evaluation.

*Barrier 102 West/210 East and a portion of barriers 206 East/210 West and 205 North/206 South behind the filter bank are not subject to the requirements for visual inspection due to ALARA considerations.

SURVEILLANCE REQUIREMENTS

- c. Performing a visual inspection of at least ten percent of each type of sealed penetration at least once per 18 months. If visually apparent adverse changes in appearance or changes from the as-built condition are found, perform an evaluation to determine whether that the fire rating of the penetration is not degraded and that the barrier(s) is OPERABLE. If the penetration(s) is determined to be inoperable, declare the affected penetration(s) inoperable and perform a visual inspection of an additional ten percent of the degraded type of sealed penetration. This inspection process shall continue until a ten percent sample with no visually apparent adverse changes in appearance or changes from the as-built condition are found or until all required sealed penetrations of the degraded type have been inspected. Samples shall be selected such that each penetration seal will be inspected at least once per 15 years.
- d. Verifying at least once per 24 hours each fire door that is unlocked is closed or that is equipped with an automatic hold-open and release mechanism is free from obstructions.
- e. Verifying at least once per 7 days each locked fire door is closed and locked.
- f. Performing a functional test that verifies the operation of automatic hold-open and release mechanisms upon full openings, and latch and closing mechanisms upon full and partial openings, at least once per 18 months.

3/4.3 INSTRUMENTATION

BASES

REMOTE SHUTDOWN INSTRUMENTATION

HOT STANDBY of the facility from locations outside of the control room. This capability is required in the event control room habitability is lost.

3/4.3.3.6 POST-ACCIDENT INSTRUMENTATION

The OPERABILITY of the post-accident instrumentation ensures that sufficient information is available on selected plant parameters to monitor and assess these variables following an accident.

3/4.3.3.7 CHLORINE DETECTION SYSTEMS

The OPERABILITY of the chlorine detection systems ensures that an accidental chlorine release will be detected promptly and the control room will be isolated automatically. The control room ventilation system will be started manually in the recirculation mode to provide the required protection. The chlorine detection systems required by this specification are consistent with the recommendations of Regulatory Guide 1.95, "Protection of Nuclear Power Plant Control Room Operations Against an Accidental Chlorine Release," February 1975.

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 redundant safe shutdown equipment required in the event of a fire 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, monitoring the affected areas is required to provide detection capability until the inoperable instrumentation is restored to OPERABILITY.

Certain fire detection instrumentation automatically actuates fire suppression and water curtain deluge systems. These detectors are included in Specification 3/4.3.3.8 due to Surveillance Requirements common with other fire detection instrumentation. The ACTION statements applicable to the fire detection instrumentation are also applicable and adequate for those fire detection instruments that actuate fire suppression and water curtain deluge systems.

PLANT SYSTEMS

BASES

3/4.7.8 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 by product, source, and special nuclear material sources will not exceed allowable intake values.

3/4.7.9 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 those portions of the facility containing redundant safe shutdown equipment required in the event of a fire. The fire suppression systems consist of the water system, sprays and sprinkler systems, fire hose stations and yard fire hydrants. The collective capability of the fire suppression systems is adequate to minimize potential damage to redundant safe shutdown equipment required in the event of a fire and is a major element in the facility fire protection program.

In the event that portions of the fire suppression systems are inoperable, compensatory measures are required until the inoperable equipment is restored to service. A backup fire suppression water system specified by Specification 3.7.9.1 may consist of a local fire department pumper, backup pump or any other system(s) allowed by plant procedures or determined by the Fire Protection Engineer to be adequate. A backup fire suppression system specified by Specifications 3.7.9.2, 3.7.9.3 and 3.7.9.4 may consist of portable extinguishers, additional fire hoses or any other system(s) allowed by the plant procedures or determined by the Fire Protection Engineer to be adequate.

The water curtain deluge systems identified in Specification 3/4.7.9.2 provide a fire barrier and are not intended for fire suppression. The water curtain deluge systems are included in Specification 3/4.7.9.2 due to Surveillance Requirements common with the spray and sprinkler systems. The specified ACTION statements are applicable and adequate for the water curtain deluge systems.

3/4.7.10 FIRE BARRIERS

The OPERABILITY of the fire barrier ensures that fires will be confined or adequately retarded from spreading to adjacent fire areas or to portions of redundant safe shutdown systems required in the event of a fire within the fire area. This design feature minimizes the possibility of a single fire rapidly involving several fire areas of the facility prior to detection and extinguishment. The fire barriers are passive elements in the facility fire protection program.

PLANT SYSTEMS

BASES

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

ADMINISTRATIVE CONTROLS

6.3 FACILITY STAFF QUALIFICATION

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for (1) the Chemistry and Health Physics General Superintendent who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975 and (2) the Shift Technical Advisor who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Nuclear Training Director and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55.

6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Nuclear Training Director.

6.5 REVIEW AND AUDIT

6.5.1 STATION REVIEW BOARD (SRB)

FUNCTION

6.5.1.1 The Station Review Board (SRB) shall function to advise the Plant Manager on all matters related to nuclear safety.

ADMINISTRATIVE CONTROLS

SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the Director of the Office of Inspection and Enforcement Regional Office within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specifications:

- a. ECCS Actuation Specification 3.5.2 and 3.5.3.
- b. Inoperable Seismic Monitoring Instrumentation, Specification 3.3.3.3.
- c. Inoperable Meteorological Monitoring Instrumentation, Specification 3.3.3.4.
- d. Seismic Event Analysis, Specification 4.3.3.3.2.
- e. Dose or dose commitment exceeds to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released to UNRESTRICTED AREAS (Specification 3.11.1.2).
- f. The discharge of radioactive liquid waste without treatment and in excess of the limits in Specification 3.11.1.3.
- g. The calculated air dose from radioactive gases exceeding the limits in Specification 3.11.2.2.
- h. The calculated dose from the release of iodine-131, tritium, and radionuclides in particulate form with half-lives greater than eight days, in gaseous effluents exceeding the limits in Specification 3.11.2.3.
- i. The discharge of radioactive gaseous waste without treatment and in excess of the limits in Specification 3.11.2.4.
- j. The calculated doses from the release of radioactive materials in liquid or gaseous effluents exceeding the limits in Specification 3.11.4.
- k. The level of radioactivity as the result of plant effluents in an environmental-sampling medium exceeding the reporting levels of Table 3.12-2 (Specification 3.12.1).