

August 2, 1988

TO ALL POWER REACTOR LICENSEES AND APPLICANTS

SUBJECT: REMOVAL OF FIRE PROTECTION REQUIREMENTS FROM TECHNICAL
SPECIFICATIONS (Generic Letter 88-12)

Generic Letter 86-10 requested that licensees incorporate the NRC-approved Fire Protection Program in their Final Safety Analysis Reports. Generic Letter 86-10 encouraged licensees, upon completion of this program, to apply for an amendment to their operating licenses (1) to replace current license conditions regarding fire protection with a new standard condition and (2) to remove unnecessary fire protection Technical Specifications (TS).

During the past two years, the staff has gained experience with implementation of Generic Letter 86-10 for new operating licenses. In addition, lead-plant proposals for this license change were submitted with the endorsement of the Westinghouse Owners Group and approved for Callaway and Wolf Creek. On the basis of this combined experience, the staff developed the enclosed guidance for the preparation of a license amendment request to implement Generic Letter 86-10.

A conforming amendment would remove fire protection requirements from TS in four major areas: fire detection systems, fire suppression systems, fire barriers, and fire brigade staffing requirements. The existing administrative control requirements related to fire protection audits would be retained. Additional programmatic requirements have been included in the administrative controls to address the Fire Protection Program consistent with the requirements for other programs.

Licensees and applicants are encouraged to propose changes to TS that are consistent with the guidance provided in the enclosures. Proposed license amendments conforming to this guidance will be expeditiously reviewed by the NRC Project Manager for the facility. Proposed amendments that deviate from this guidance will require a longer, more detailed review. Please contact the Project Manager if you have questions on this matter.

Sincerely,

Frank J. Miraglia
Associate Director for Projects
Office of Nuclear Reactor Regulation

Enclosures:
As stated

Enclosure 1

GUIDANCE FOR REMOVAL OF FIRE PROTECTION REQUIREMENTS FROM TECHNICAL SPECIFICATIONS

INTRODUCTION

This enclosure provides guidance for the preparation of a license amendment request to implement Generic Letter 86-10. Such an amendment (1) institutes the standard license condition for a Fire Protection Program. (2) removes requirements for fire protection systems from Technical Specifications (TS), (3) removes fire brigade staffing requirements from TS, and (4) adds administrative controls to TS that are consistent with those for other programs implemented by license condition. The submittal must also include the update of the Final Safety Analysis Report (FSAR) to include the Fire Protection Program, if this has not been completed as requested by Generic Letter 86-10.

The staff's intent in Generic Letter 86-10 of recommending that fire protection requirements be removed from the TS was to further the goal of Technical Specification improvement as delineated in other NRC policy statements. It is not the staff's intent to reduce the level of fire safety.

This guidance was developed on the basis of the review of lead-plant proposals for Callaway and Wolf Creek and from staff experience in implementing Generic Letter 86-10 for recent operating licenses.

DISCUSSION

This section addresses the elements a licensee should include in a license amendment request to remove fire protection requirements from TS.

First, the NRC-approved Fire Protection Program(1) must be incorporated into the FSAR and submitted with the certification required by 10 CFR 50.71(e)(2). as requested by Generic Letter 86-10. The FSAR update includes the incorporation of the Fire Protection Program, including the fire hazards analysis and major commitments that form the basis for the NRC-approved Fire Protection Program. This may be accomplished by referencing the documents which define the licensee's Fire Protection Program as identified in the NRC's Safety Evaluation Reports.

The staff does not intend to repeat its review of the approved Fire Protection Program incorporated in the updated FSAR. The staff may audit the updated FSARs to assure that they have incorporated the approved Fire Protection Program. Licensees should not use this FSAR incorporation as an opportunity to make changes in the approved Fire Protection Program. Licensees should

(1) The NRC-approved Fire Protection Program includes the fire protection and post-fire safe shutdown systems necessary to satisfy NRC guidelines and requirements; administrative and technical controls; the fire brigade and fire protection related technical staff; and other related plant features which have been described by the licensee in the FSAR, fire hazards analysis, responses to staff requests for additional information, comparisons of plant designs to applicable NRC fire protection guidelines and requirements, and descriptions of the methodology for assuring safe plant shutdown following a fire.

wait until the standard license condition is in place and then use the procedures described in the license condition to make any necessary changes in the Fire Protection Program.

Second, the Limiting Conditions for Operation (LCO) and Surveillance Requirements associated with fire detection systems, fire suppression systems, fire barriers, and the administrative controls that address fire brigade staffing would be relocated from the TS. An index of these specifications is provided in Enclosure 2. The existing administrative controls related to fire protection audits are to be retained in TS. Also, any specifications related to the capability for safe shutdown following a fire, e.g., see Item 8(j) in Enclosure 1 to Generic Letter 61-12, are to be retained in TS.

Third, all operational conditions, remedial actions, and test requirements presently included in the TS for these systems, as well as the fire brigade staffing requirements, shall be incorporated into the Fire Protection Program. In this manner, the former TS requirements will become an integral part of the Fire Protection Program and changes subsequent to this amendment will be subject to the standard license condition. These remedial actions include shutdowns currently required by TS 3.0.3 when an LCO and its associated Action Requirements cannot be met. An example of such a requirement is the shutdown required for the loss of the fire suppression water system and failure to establish a backup water supply within 24 hours.

Fourth, the standard fire protection license condition in Generic Letter 86-10 must be included in the license. Any other current fire protection license conditions shall be removed. This license condition precludes changes to the approved Fire Protection Program without prior Commission approval if those changes would adversely affect the ability to achieve and maintain safe shutdown conditions in the event of a fire. The shutdown requirement that applies because of a failure to establish a backup water supply within 24 hours after a loss of the fire suppression water system is an example of a Fire Protection Program requirement that would be subject to the license condition and could be changed in accordance with the standard license condition. However, the staff believes that any change to the shutdown requirement would also require the implementation of extraordinary compensatory measures. Absent such extraordinary measures, changes to this requirement are likely to have an adverse effect on the ability to achieve and maintain safe shutdown in the event of a fire and, therefore, could not be made without prior Commission approval.

Finally, the Administrative Controls section of the TS shall be augmented to support the Fire Protection Program. This shall be accomplished by additions to two specifications. First, the Unit Review Group (Onsite Review Group) shall be given responsibility for the review of the Fire Protection Program and implementing procedures and the submittal of recommended changes to the Company Nuclear Review and Audit Group (Offsite or Corporate Review Group). Second, Fire Protection Program implementation shall be added to the list of elements for which written procedures shall be established, implemented, and maintained.

The Emergency Plan and the Security Plan were used as models to determine the appropriate administrative control for the Fire Protection Program. These additions will provide administrative controls for the Fire Protection Program that are equivalent to those for other programs that are implemented by license condition. The enclosed marked pages of the Westinghouse Standard Technical

Specifications (STS) serve as a model for the changes to the administrative controls. If the plant's TS differ from the STS, additions to the administrative controls for the Fire Protection Program should be proposed that are consistent with the administrative controls for the Emergency and Security Plans.

In Generic Letter 86-10, licensees were reminded of their responsibilities to report deficiencies in the Fire Protection Program which meet the criteria of 10 CFR 50.72 and 10 CFR 50.73. Other conditions which represent deficiencies of this program and are not encompassed by the above reporting criteria should be evaluated by the licensees to determine appropriate corrective action.

Summary

The implementation of Generic Letter 86-10 to remove fire protection TS will entail (1) a revision to the FSAR to incorporate the approved Fire Protection Program, (2) incorporation into the Fire Protection Program of the operational conditions, remedial actions, tests, and fire brigade staffing requirements for fire protection removed from the TS, and (3) a license amendment. The license amendment will (1) institute the standard fire protection license condition, (2) remove the fire protection systems and fire brigade staffing TS, and (3) add administrative controls to support the Fire Protection Program.

Any questions on this matter should be directed to the NRC Project Manager for your facility.