



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

AUG 02 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

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Enclosures:
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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 Program¹ 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

¹The 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 81-12, 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.

Enclosure 2

MARKUP OF WESTINGHOUSE STANDARD TECHNICAL SPECIFICATIONS

6.0 ADMINISTRATIVE CONTROLS

6.5 REVIEW AND AUDIT

[The method by which independent review and audit of unit operations is accomplished may take one of several forms. The licensee may either assign this function to an organizational unit separate and independent from the group having responsibility of unit operation or may utilize a standing committee composed of individuals from within and outside the licensee's organization.

Irrespective of the method used, the licensee shall specify the details of each functional element provided for the independent review and audit process as illustrated in the following example specifications.]

6.5.1 [UNIT REVIEW GROUP (URG)]

FUNCTION

6.5.1.1 The [URG] shall function to advise the [Plant Superintendent] on all matters related to nuclear safety.

6.5.1.2 through 6.5.1.5 (No change)

RESPONSIBILITIES

6.5.1.6 The [URG] shall be responsible for:

a. through l. (No change)

m. Review of the Fire Protection Program and implementing procedures and the submittal of recommended changes to the [Company Nuclear Review and Audit Group].

6.5.1.7 through 6.7 (No change)

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented, and maintained covering the activities referenced below:

a. through g. (No change)

h. Fire Protection Program implementation.

INDEX OF REMOVED FIRE PROTECTION SPECIFICATIONS AND BASES

3/4.3.3.8 Fire Detection Instrumentation

Table 3.3-11 FIRE DETECTION INSTRUMENTATION

3/4.7.11 FIRE SUPPRESSION SYSTEMS

3/4.7.11.1 Fire Suppression Water System

3/4.7.11.2 Spray and/or Sprinkler Systems

3/4.7.11.3 CO₂ Systems

3/4.7.11.4 Halon Systems

3/4.7.11.5 Fire Hose Stations

Table 3.7-4 FIRE HOSE STATIONS

3/4.7.11.6 Yard Hydrants and Hydrant Hose Houses

Table 3.7-5 YARD HYDRANTS AND HYDRANT HOSE HOUSES

3/4.7.12 Fire Rated Assemblies

6.2.2.e (Fire Brigade Staffing Requirements)

Enclosure 3

LIST OF RECENTLY ISSUED GENERIC LETTERS

Generic Letter No.	Subject	Date of Issuance	Issued To
GL 88-11	NRC POSITION ON RADIATION EMBRITTLEMENT OF REACTOR VESSEL MATERIALS AND ITS IMPACT ON PLANT OPERATIONS	07/12/88	ALL LICENSEES OF OPERATING REACTORS AND HOLDERS OF CONSTRUCTION PERMITS
GL 88-10	PURCHASE OF GSA APPROVED SECURITY CONTAINERS	07/01/88	ALL POWER REACTOR LICENSEES AND HOLDERS OF PART 95 APPROVALS
GL 88-09	PILOT TESTING OF FUNDAMENTALS EXAMINATION	05/17/88	ALL LICENSEES OF ALL BOILING WATER REACTORS AND APPLICANTS FOR A BOILING WATER REACTOR OPERATOR'S LICENSE UNDER 10 CFR PART 55
GL 88-08	MAIL SENT OR DELIVERED TO THE OFFICE OF NUCLEAR REACTOR REGULATION	05/03/88	ALL LICENSEES FOR POWER AND NON-POWER REACTORS AND HOLDERS OF CONSTRUCTION PERMITS FOR NUCLEAR POWER REACTORS
GL 88-07	MODIFIED ENFORCEMENT POLICY RELATING TO 10 CFR 50.49, "ENVIRONMENTAL QUALIFICATION OF ELECTRICAL EQUIPMENT IMPORTANT TO SAFETY FOR NUCLEAR POWER PLANTS"	04/07/88	ALL POWER REACTOR LICENSEES AND APPLICANTS
GL 88-06	REMOVAL OF ORGANIZATION CHARTS FROM TECHNICAL SPECIFICATION ADMINISTRATIVE CONTROL REQUIREMENTS	03/22/88	ALL POWER REACTOR LICENSEES AND APPLICANTS
GL 88-05	BORIC ACID CORROSION OF CARBON STEEL REACTOR PRESSURE BOUNDARY COMPONENTS IN PWR PLANTS	03/17/88	ALL LICENSEES OF OPERATING PWRs AND HOLDERS OF CONSTRUCTION PERMITS FOR PWRs
GL 88-04	DISTRIBUTION OF GEMS IRRADIATION IN RESEARCH REACTORS	02/23/88	ALL NON-POWER REACTOR LICENSEES



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

Enclosure 2

MEMORANDUM FOR: Sholly Coordinator

FROM: [], Director
PWR, Project Directorate No.
Division of PWR Licensing-A

SUBJECT: REQUEST FOR PUBLICATION IN BIWEEKLY FR NOTICE -
NOTICE OF CONSIDERATION OF ISSUANCE OF AMENDMENT
TO FACILITY OPERATING LICENSE AND PROPOSED NO
SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION AND
OPPORTUNITY FOR A HEARING

[Utility Name], Docket No. STN 50-[], [Plant Name, Unit(s) 12]

[County], [State]

Date of application for amendment:

Description of amendment request: The proposed amendment would revise condition[s] ____ of the license issued _____, would remove fire protection Technical Specifications 3/4.3.3.[7], 3/4.7.11.1 through 3/4.7.11.[6], 3/4.7.12, and 6.2.2.e, and the corresponding Section 3/4 Bases, and revise Technical Specifications 6.5.1.6 and 6.8.1 of Appendix A of that license. Generic Letters 86-10, dated April 24, 1986, and 88-12, dated August 2, 1988, from the NRC provided guidance to licensees to request removal of the fire protection Technical Specifications. The licensee's proposed amendment is in response to these Generic Letters.

Basis for proposed no significant hazards consideration determination: The staff has evaluated this proposed amendment and determined that it involves no significant hazards considerations. According to 10 CFR 50.92(c), a proposed amendment to an operating license involves no significant hazards considerations if operation of the facility in accordance with the proposed amendment would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated; or

2. Create the possibility of a new or different kind of accident from any accident previously evaluated; or
3. Involve a significant reduction in a margin of safety.

The proposed revision to the License Condition is in accordance with the guidance provided in Generic Letter 86-10 for licensees requesting removal of fire protection Technical Specifications. The incorporation of the NRC-approved Fire Protection Program, and the former TS requirements by reference to the procedures implementing these requirements, into the Final Safety Analysis Report (FSAR) and the use of the standard License Condition, on fire protection, will ensure that the Fire Protection Program, including the systems, the administrative and technical controls, the organization, and the other plant features associated with fire protection will be on a consistent status with other plant features described in the FSAR. Also, the provisions of 10 CFR 50.59 would then apply directly for changes the licensee desires to make in the Fire Protection Program. In this context, the determination of the involvement of an unreviewed safety question defined in § 50.59(a)(2) would be made based on the "accident...previously evaluated" being the postulated fire in the fire hazards analysis for the fire area affected by the change. Hence, the proposed License Condition establishes an adequate basis for defining the scope of changes to the Fire Protection Program which can be made without prior Commission approval, i.e., without introduction of an unreviewed safety question. The revised License Condition or the removal of the existing TS requirements on fire protection does not create the possibility of a new or different kind of accident from those previously evaluated. They also don't involve a significant reduction in the margin of safety since the License Condition does not alter the requirement that an evaluation be performed for

the identification of an unreviewed safety question for each proposed change to the Fire Protection Program. Consequently, the proposed License Condition or the removal of the fire protection requirements do not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed modification of the Administrative Control Section 6 of the Technical Specifications includes the addition of Fire Protection Program implementation to the requirements for Specification 6.8, Procedures and Programs, that requires written procedures be established, implemented, and maintained covering this program. This section of the Technical Specifications is also modified to include the review of the Fire Protection Program and implementing procedures and the submittal of recommended changes to the [Company Nuclear Audit and Review Group] as one of the responsibilities of the [Unit Review Group] under Specification 6.5.1.6. In this manner, the Fire Protection Program will be addressed by administrative control requirements that are consistent with other programs addressed by License Conditions. These changes are administrative in nature and do not impact the operation of the facility in a manner that involves significant hazards considerations.

The proposed amendment includes the removal of fire protection Technical Specifications in four areas: (1) fire detection systems, (2) fire suppression systems, (3) fire barriers, and (4) fire brigade staffing requirements. While it is recognized that a comprehensive Fire Protection Program is essential to plant safety, many details of this program that are currently addressed in Technical Specifications can be modified without affecting nuclear safety. With the removal of these requirements from the Technical Specifications, they have been incorporated into the Fire Protection Program implementing procedures. Hence, with the additions to the existing administrative control

requirements that are applicable to the Fire Protection Program and the revised License Condition, there are suitable administrative controls to ensure that licensee initiated changes to these requirements, that have been removed from the Technical Specifications, will receive careful review by competent individuals. Again, these changes are administrative in nature and do not impact the operation of the facility in a manner that involves significant hazards considerations.

Based on the preceding assessment, the staff believes this proposed amendment involves no significant hazards considerations.

Local Public Document Room location:

Attorney for Licensee:

NRC Project Director:

_____, Director
PWR Project Directorate No. ____
Division of PWR Licensing-A ____

MODEL SER

Underscored blank spaces are to be filled in with the applicable facility information. The information identified in brackets should be used as applicable on a plant-specific basis.

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
 RELATED TO AMENDMENT NO. ___ TO FACILITY OPERATING LICENSE NFP-___
 AND AMENDMENT NO. ___ TO FACILITY OPERATING LICENSE NFP-___
 [UTILITY NAME]
 DOCKET NOS. 50-___ AND 50-___
 [PLANT NAME], UNITS 1 AND 2

INTRODUCTION

By letter dated _____, 1988, [utility name] (the licensee) [proposed that the existing license condition[s] on fire protection be replaced with the standard condition noted in Generic Letter 86-10 and also] proposed changes to the Appendix A Technical Specifications (TS) for [plant name]. The proposed changes would remove requirements for fire detection systems, fire suppression systems, fire barriers, and fire brigade staffing requirements as recommended by Generic Letter 86-10. The proposed changes would also modify the administrative control requirements of the TS to add requirements for the Fire Protection Program that are similar to requirements for other programs implemented by license condition. Guidance on these proposed changes to TS was provided to all power reactor licensees and applicants by Generic Letter 88-12, dated August 2, 1988.

BACKGROUND

Following the fire at the Browns Ferry Nuclear Power Plant on March 22, 1975, the Commission undertook a number of actions to ensure that improvements were implemented in the Fire Protection Programs for all power reactor facilities. Because of the extensive modification of Fire Protection Programs and the number of open issues resulting from staff evaluations, a number of revisions and alterations occurred in these programs over the years. Consequently, licensees were requested by Generic Letter 86-10 to incorporate the final NRC-approved Fire Protection Program in their Final Safety Analysis Reports (FSARs). In this manner, the Fire Protection Program -- including the systems, the administrative and technical controls, the organization, and other plant features associated with fire protection -- would have a status consistent with that of other plant features described in the FSAR. In addition, the Commission concluded that a standard license condition, requiring compliance with the provisions of the Fire Protection Program as described in the FSAR, should be used to ensure uniform enforcement of fire protection requirements. Finally, the Commission stated that with the requested actions, licensees may request an amendment to delete the fire protection TS that would now be unnecessary.

The licensees for the Callaway and Wolf Creek plants submitted lead-plant proposals to remove fire protection requirements from their TS. This action was an industry effort to obtain NRC guidance on an acceptable format for license amendment requests to remove fire protection requirements from TS.

Additionally, in the licensing review of new plants, the staff has approved applicant requests to remove fire protection requirements from TS issued with the operating license. Thus, on the basis of the lead-plant proposals and the staff's experience with TS for new licenses, Generic Letter 88-12 was issued to provide guidance on removing fire protection requirements from TS.

EVALUATION

Generic Letter 86-10 recommended the removal of fire protection requirements from the TS. Although a comprehensive Fire Protection Program is essential to plant safety, the basis for this recommendation is that many details of this program that are currently addressed in TS can be modified without affecting nuclear safety. Such modifications can be made provided that there are suitable administrative controls over these changes. These details, that are presently included in TS and which are removed by this amendment, do not constitute performance requirements necessary to ensure safe operation of the facility and, therefore, do not warrant being included in TS. At the same time, suitable administrative controls ensure that there will be careful review and analysis by competent individuals of any changes in the Fire Protection Program including those technical and administrative requirements removed from the TS to ensure that nuclear safety is not adversely affected. These controls include: (1) the TS administrative controls that are applicable to the Fire Protection Program; (2) the license condition on implementation of, and subsequent changes to, the Fire Protection Program; and (3) the 10 CFR 50.59 criteria for evaluating changes to the Fire Protection Program as described in the FSAR.

The specific details relating to fire protection requirements removed from TS by this amendment include those specifications for fire detection systems, fire suppression systems, fire barriers, and fire brigade staffing requirements. The administrative control requirements have been modified to include Fire Protection Program implementation as an element for which written procedures must be established, implemented, and maintained. In addition, the audit responsibilities of the [Unit Review Group] were expanded to include the review of the Fire Protection Program and implementing procedures and submittal of recommended changes to the [Company Nuclear Review and Audit Group].

The TS changes proposed by the licensee are in accordance with the guidance provided by Generic Letter 88-12, as addressed in the items below.

- (1) Specification [6.5.1.6, Unit Review Group Responsibilities], was revised to add the review of the fire protection program implementation and the submittal of recommended changes to the [CNRAG (Company Nuclear Review and Audit Group)].
- (2) Specification [6.8], Procedures and Programs, was revised to add Fire Protection Program implementation to those programs for which written procedures shall be established, implemented, and maintained.
- (3) Specification [3.3.3.8], Fire Detection Instrumentation, its associated Surveillance Requirements, and Bases were removed.
- (4) Specifications [3.7.11.1 through 3.7.11.6], Fire Suppression Systems, their associated Surveillance Requirements, and Bases were removed.

- (5) Specification [3.7.12], Fire Barriers, its associated Surveillance Requirements, and Bases were removed.
- (6) Specification [6.2.2.e] on fire brigade staffing requirements was removed.

As required by Generic Letter 86-10, the licensee confirmed that the NRC-approved Fire Protection Program has been incorporated into the FSAR. [Also, the licensee has proposed that the existing licensing condition[s] on the Fire Protection Program be replaced with the standard condition noted in Generic Letter 86-10. OR The licensee confirmed that the current license condition on fire protection is the standard condition provided in Generic Letter 86-10.]

The licensee confirmed that the operational conditions, remedial actions, and test requirements associated with the removed fire protection TS have been included in the Fire Protection Program incorporated into the FASR. This is in accordance with the guidance of Generic Letter 88-12.

On the basis of its review of the above items, the staff concludes that the licensee has met the guidance of Generic Letter 88-12. Therefore, the staff finds the proposed changes acceptable.

ENVIRONMENTAL CONSIDERATION

These amendments involve changes to the use of the facility components located within the restricted area as defined in 10 CFR Part 20. The staff has determined that the amendments involve no significant increase in the amounts and no significant change in the types of any effluents that may be released off site, and that there is no significant increase in individual or cumulative occupational exposure. The staff has determined that the amendments involve no significant-hazards consideration, and there has been no public comment on such finding. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of these amendments.

CONCLUSION

The Commission made proposed determinations that the amendments involve no significant-hazards consideration, which were published in the Federal Register (53 FR ____) on _____, 1988. The Commission consulted with the State of _____. No public comments were received, and the State of _____ did not have any comments.

On the basis of the considerations discussed above, the staff concludes that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of these amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: Dennis J. Kubicki, SPLB/DEST
Thomas G. Dunning, OTSB/DOEA
_____, PD_/DPR_

Dated: _____, 1988

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TGDunning
DJKubicki
JHConran

In a telephone conversation with Jim Conran on 7/28/88, Mr. Conran indicated that CRGR comments from the CRGR meeting on 7/27/88 had been satisfactorily addressed in this generic letter. Richard L. Emch, Jr.
7/29/88

NOTE: In response to CRGR comments during the CRGR meeting on 07/27/88, the wording of the Generic Letter was coordinated with and revised to satisfactorily include OGC comments provided by Robert Fonner on 07/27/88. This resolves CRGR comments from the meeting on 7/27/88.

Richard L. Emch, Jr.
R.L. Fonner 7/28/88 (OGC)

TSB:DOEA:NRR
TGDunning:tg
07/28/88

TSB:DOEA:NRR
RLEmch
07/29/88

C:TSB:DOEA:NRR
EJButcher
07/29/88

CUD
C:GCB:DOEA:NRR
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TGDunning 7/28/88
R.L. Fonner 7/28/88 (OGC)

TSB:DOEA:NRR
TGDunning:tg
07/28/88

TSB:DOEA:NRR
RLEmch
07/29/88

C:TSB:DOEA:NRR
EJButcher
07/29/88

CUD
C:GCB:DOEA:NRR
CHBerlinger
08/1/88

D:DOEA:NRR
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GL 88-12

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R. L. Emch, Jr. 7/29/88
R.L. Fonner 7/28/88 (OGC)

TSB:DOEA:NRR
TGDunning:tg
07/28/88

TSB:DOEA:NRR
RLEmch
07/29/88

C:TSB:DOEA:NRR
EJButcher
07/29/88

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08/1/88

D:DOEA:NRR
CERossi
08/2/88

ASA:NRR
FJMiraglia
08/2/88

AUG 02 1988

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Sincerely,

Original signed by
Frank J. Miraglia

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

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