

EVALUATION OF PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS
SITE FIRE BRIGADE AND FIRE BRIGADE TRAINING
THREE MILE ISLAND UNIT 1
DOCKET NO. 50-289

Introduction

In a memorandum of June 20, 1984, which was contained in Inspection Report 50-289/84-29, NRR recommended two changes to the Technical Specifications. The changes involve clarification of the site fire brigade (TS 6.2.2.g) and criteria for fire brigade training (TS 6.4.2). These recommendations were made as the result of findings and open issues contained in Inspection Report 50-289/83-18. In a July 2, 1985, letter, GPUN responded to these recommendations and provided reasons not to incorporate changes in the Technical Specifications. The staff has evaluated these comments, past Inspection Reports and, with several conditions, concurs with the licensee.

Site Fire Brigade

In the June 20, 1984, memorandum, the staff recommended that TS 6.2.2.g reference the current practice of using separate fire brigades for Unit 1 and Unit 2 in lieu of a Site Fire Brigade. The reasons for this change were that each unit has separate fire pre-plans and different hazards exist in the two units. In the July 2, 1985, letter, GPUN restates the current two brigade practice but has committed to use personnel on Units 1 and 2 providing they have been trained on both units. In addition, as activities on Unit 2 decrease, a site fire brigade may be more suitable than separate unit brigades.

We have reviewed GPUN response to the issue of separate fire brigades and conclude that the training of personnel who may be used on either brigade provides a suitable response for our concerns of separate fire pre-plans and different hazards existing between the two units. We also agree that, in

time, a site fire brigade should provide adequate response for both units. With regard to training of members who may be used on both units, GPUN should insure that personnel:

- ° are cognizant of changes in each unit's fire protection plan, procedures, and equipment,
- ° participate in drills on both units, and
- ° are periodically evaluated on a schedule commensurate with current evaluation criteria (four drills/year, minimum of two drills/year for the two units).

Criteria for Fire Brigade Training

In the June 20, 1984, memorandum, the staff recommended that the licensee's fire brigade training requirements per their Technical Specifications be changed to include features contained in Section I of Appendix R of 10 CFR 50. The purpose of the requested change was to update the fire brigade training criteria as described in the Technical Specifications to reflect current NRC positions and to make it more enforceable than the National Fire Protection Association code. In their July 2, 1985, letter, GPUN states that the fire brigade training contained in a January 4, 1984, submittal of the Fire Protection Plan is a licensing basis document.

In retrospect, the staff agrees that the revised Fire Protection Plan is a licensing document and the fire brigade training contained in the January 4, 1984, plan does comply with the intent of Section I of Appendix R of 10 CFR 50. In addition, Inspection Report 50-289/84-29 has closed out previously unresolved training issues and allegations. We, therefore, conclude that the steps taken by the licensee are appropriate and that a Technical Specifications change is not required at this time.