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January 3, 2000

Docket Nos. 50-321  
50-366

HL-5871

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

Edwin I. Hatch Nuclear Plant  
Supplement to Request to Revise Technical Specifications to  
Implement Previously Approved Generic Changes

Ladies and Gentlemen:

This letter supplements the Edwin I. Hatch Nuclear Plant Technical Specifications change request to implement previously approved generic changes to the Standard Technical Specifications transmitted to the Nuclear Regulatory Commission (NRC) by letter dated February 5, 1999. The bases for supplementing the previous change request are as follows:

1. Since the February 5th submittal, the NRC approved an industry generic change affecting TSTF No. 45. Specifically, the requirement to eliminate checking locked primary containment isolation valves every 31 days was extended to include the secondary containment isolation valves. As a result, the changes provided in this letter supplement the previous change request for Surveillance Requirements (SRs) 3.6.1.3.2 and 3.6.1.3.3 by including a change to SR 3.6.4.2.1.
2. An environmental assessment that is valid for the enclosed proposed change, as well as for the previously proposed changes, is provided.
3. The request to implement Proposed Change Seven (TSTF No. 76) of the previous submittal is withdrawn.

Enclosure 1 provides the justification for the additional proposed change. Enclosure 2 provides the 10 CFR 50.92 evaluation for the additional change and the environmental assessment. Enclosure 3 provides page change instructions for incorporating the proposed change and the revised Technical Specifications pages. Enclosure 4 provides the associated Bases pages for your information. Enclosure 5 provides the marked-up Technical Specifications and Bases pages.

In accordance with the requirements of 10 CFR 50.91, the designated State official will be sent a copy of this letter and all applicable enclosures.

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U.S. Nuclear Regulatory Commission  
Page 2  
January 3, 2000

Mr. H. L. Sumner, Jr. states he is Vice President of Southern Nuclear Operating Company and is authorized to execute this oath on behalf of Southern Nuclear Operating Company, and to the best of his knowledge and belief, the facts set forth in this letter are true.

Respectfully submitted,

*H. L. Sumner*

H. L. Sumner, Jr.

Sworn to and subscribed before me this 3<sup>rd</sup> day of January ~~1999~~ <sup>2000</sup>.

*Elaine E. Belton*

Notary Public

My Commission Expires MAY 25, 2003

Commission Expiration Date: \_\_\_\_\_

OCV/eb

Enclosures:

1. Basis for Change Request
2. 10 CFR 50.92 Evaluation and Environmental Assessment
3. Page Change Instructions and Revised Technical Specifications Pages
4. Bases Changes
5. Marked-Up Technical Specifications and Bases Pages

cc: Southern Nuclear Operating Company  
Mr. P. H. Wells, Nuclear Plant General Manager  
SNC Document Management (R-Type A02.001)

U.S. Nuclear Regulatory Commission, Washington, D.C.  
Mr. L. N. Olshan, Project Manager - Hatch

U.S. Nuclear Regulatory Commission, Region II  
Mr. L. A. Reyes, Regional Administrator  
Mr. J. T. Munday, Senior Resident Inspector - Hatch

State of Georgia  
Mr. L. C. Barrett, Commissioner - Department of Natural Resources

HL-5871

## Enclosure 1

### Edwin I. Hatch Nuclear Plant Supplement to Request to Revise Technical Specifications to Implement Previously Approved Generic Changes

#### Basis for Change Request

##### Introduction

On February 5, 1999, Southern Nuclear Operating Company (SNC) transmitted to the Nuclear Regulatory Commission (NRC) a request to revise the Edwin I. Hatch Nuclear Plant Technical Specifications to implement previously approved generic changes to the Standard Technical Specifications. Since the February 5th submittal, the NRC approved an industry generic change affecting TSTF No. 45. Specifically, the requirement to eliminate checking locked primary containment isolation valves every 31 days was extended to include the secondary containment isolation valves. As a result, the changes provided in this letter supplement the previous change request for Surveillance Requirements (SRs) 3.6.1.3.2 and 3.6.1.3.3 by including a change to SR 3.6.4.2.1.

Enclosure 4 of this submittal includes the associated revised Bases pages for information only. The Bases pages for SR 3.6.1.3.3 are included, because they were inadvertently omitted from SNC's February 5th submittal.

In addition to the above noted change, we formally withdraw our request to implement TSTF No. 76 as described in proposed change seven of the February 5th submittal. As a result, please disregard the changes to Unit 1 and Unit 2 Technical Specifications page 5.0-7.

##### Basis for Proposed Change

SR 3.6.4.2.1 requires verification that the Secondary Containment Isolation Valves (SCIVs) required to be closed during accident conditions are indeed closed, thus providing verification for the valves that are not secured in the closed position. This proposed change is consistent with Emergency Core Cooling Systems (ECCS) Specification 3.5.2 in that SR 3.5.2.4 does not require verification of valves that are "locked, sealed, or otherwise secured in position" because:

1. The subject valves are verified to be in the correct position prior to being locked, sealed, or secured.
2. The valves are periodically checked via the Operations Department locked valve procedure.

The majority of SCIVs should be in the closed position following an accident. Locked SCIVs are verified to be in the closed position prior to being locked. Therefore, it is unnecessary for SCIVs to be verified closed under the provisions of SR 3.6.4.2.1. The fact that SCIVs are secured closed assures they will be in the safe position following an accident. Furthermore, per Plant Hatch procedures, locked valves are periodically verified to be in their correct position, thereby providing additional assurance the SCIVs will remain in the proper position.

## Enclosure 2

### Edwin I. Hatch Nuclear Plant Supplement to Request to Revise Technical Specifications to Implement Previously Approved Generic Changes

#### 10 CFR 50.92 Evaluation and Environmental Assessment

#### 10 CFR 50.92 Evaluation

In 10 CFR 50.92(2), the Nuclear Regulatory Commission provides the following standards to be used in determining the existence of a significant hazards consideration:

... a proposed amendment to an operating facility licensed under 50.21(b) or 50.22 for a testing facility involves no significant hazards consideration 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 an accident of a new or different kind from any previously evaluated; or 3) involve a significant reduction in the margin of safety.

Southern Nuclear Operating Company has reviewed the proposed license amendment request and determined its adoption does not involve a significant hazards consideration based on the following discussion:

#### **Justification for Proposed Change**

- 1. The proposed change does not involve a significant increase in the probability or the consequences of a previously evaluated event for the following reasons:*

Locked secondary containment isolation valves (SCIVs) are verified to be in the closed position prior to being locked, sealed, or secured in position. Therefore, it is unnecessary for the SCIVs to be verified closed under the provisions of Surveillance Requirement (SR) 3.6.4.2.1. The fact that the SCIVs will be secured closed assures they will be in the safe position following an accident. Furthermore, per Plant Hatch procedures, locked valves are periodically verified to be in their correct position, thereby providing additional assurance the valves will remain in the correct position. For these reasons, the proposed change to SR 3.6.4.2.1 does not involve a significant increase in the probability or the consequences of a previously evaluated event.

- 2. The proposed change does not create the possibility of an accident of a new or different kind from any previously evaluated based upon the following:*

Removing the SR to verify locked SCIVs are in their "safe" position does not increase the likelihood of occurrence or consequences of a new type of event, since no new modes of operation are introduced. All plant systems will continue to operate within their design basis.

Since the valves are verified to be in the safe position prior to locking, and are periodically verified to be in that position per the locked valve procedure, the valves will be in the position assumed in the accident analysis should an event occur.

3. *The change does not significantly reduce the margin of safety based upon the following:*

Not requiring position surveillance on SCIVs locked, sealed, or secured in position does not reduce the margin of safety, because the valves are verified to be in their “safe” position prior to locking. This ensures the valves will remain in the “safe” position until they are locked again. Plant Hatch procedures require that the position of the locked valves is verified periodically. Also, the locked valves are verified to be in their proper position whenever Operations Management deems necessary. Furthermore, a malicious unlocking of the valves is unlikely, since the shift supervisor (SS) controls the keys. Anyone wanting to check out a key must obtain SS approval. For these reasons, the margin of safety is not reduced.

Environmental Assessment

10 CFR 51.22(c)(9) provides criteria for and identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed amendment to an operating facility requires no environmental assessment if operation of the facility in accordance with the proposed amendment would not:

1. Involve a significant hazards consideration;
2. Result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite;
3. Result in a significant increase in individual or cumulative occupational exposure.

Southern Nuclear Operating Company (SNC) has determined the proposed Technical Specifications changes described in Enclosure 1 of this and the February 1999 submittal meet the eligibility criteria for categorical exclusion. The bases for this determination are as follows:

1. As demonstrated in the 10 CFR 50.92 evaluations (Enclosure 2 of this letter and the February 5, 1999, letter), the proposed changes do not involve a significant hazards consideration.
2. None of the changes affect any of the programs in place at Plant Hatch that control radioactive material effluents.
3. None of the proposed changes will result in plant personnel having to place themselves in situations that may increase their occupational exposure. The proposed change eliminating the need to verify the position of locked isolation valves every 31 days may reduce the risk of occupational exposure.

Enclosure 3

Edwin I. Hatch Nuclear Plant  
Supplement to Request to Revise Technical Specifications to  
Implement Previously Approved Generic Changes

Page Change Instructions  
and  
Revised Technical Specifications Pages

Unit 1

<u>Page</u>	<u>Replace</u>
3.6-42	3.6-42

Unit 2

<u>Page</u>	<u>Replace</u>
3.6-44	3.6-44

**SURVEILLANCE REQUIREMENTS**

SURVEILLANCE	FREQUENCY
<p>SR 3.6.4.2.1 -----NOTES-----</p> <ol style="list-style-type: none"> <li>1. Valves and blind flanges in high radiation areas may be verified by use of administrative means.</li> <li>2. Not required to be met for SCIVs that are open under administrative controls.</li> </ol> <p>-----</p> <p>Verify each secondary containment isolation manual valve and blind flange that is not locked, sealed, or otherwise secured and is required to be closed during accident conditions is closed.</p>	<p>31 days</p>
<p>SR 3.6.4.2.2 Verify the isolation time of each power operated and each automatic SCIV is within limits.</p>	<p>92 days</p>
<p>SR 3.6.4.2.3 Verify each automatic SCIV actuates to the isolation position on an actual or simulated actuation signal.</p>	<p>18 months</p>



**SURVEILLANCE REQUIREMENTS**

SURVEILLANCE	FREQUENCY
<p>SR 3.6.4.2.1 -----NOTES-----</p> <ol style="list-style-type: none"> <li>1. Valves and blind flanges in high radiation areas may be verified by use of administrative means.</li> <li>2. Not required to be met for SCIVs that are open under administrative controls.</li> </ol> <p>-----</p> <p>Verify each secondary containment isolation manual valve and blind flange that is not locked, sealed, or otherwise secured and is required to be closed during accident conditions is closed.</p>	<p>31 days</p>
<p>SR 3.6.4.2.2 Verify the isolation time of each power operated and each automatic SCIV is within limits.</p>	<p>92 days</p>
<p>SR 3.6.4.2.3 Verify each automatic SCIV actuates to the isolation position on an actual or simulated actuation signal.</p>	<p>18 months</p>

Enclosure 4

Edwin I. Hatch Nuclear Plant  
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Implement Previously Approved Generic Changes

Bases Changes

Unit 1

<u>Page</u>	<u>Replace</u>
B 3.6-24	B 3.6-24
B 3.6-25	B 3.6-25
B 3.6-86	B 3.6-86

Unit 2

<u>Page</u>	<u>Replace</u>
B 3.6-24	B 3.6-24
B 3.6-25	B 3.6-25
B 3.6-93	B 3.6-93

BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.6.1.3.1 (continued)

allowed to be open for limited periods of time. The 31 day Frequency is consistent with other PCIV requirements discussed in SR 3.6.1.3.2.

SR 3.6.1.3.2

This SR verifies that each primary containment isolation manual valve and blind flange that is located outside primary containment and is required to be closed during accident conditions and is not locked, sealed, or otherwise secured, is closed. The SR helps to ensure that post accident leakage of radioactive fluids or gases outside the primary containment boundary is within design limits.

This SR does not require any testing or valve manipulation. Rather, it involves verification that those isolation devices outside primary containment, and capable of being mispositioned, are in the correct position. Since verification of valve position for isolation devices outside primary containment is relatively easy, the 31 day Frequency was chosen to provide added assurance that the isolation devices are in the correct positions.

Two Notes have been added to this SR. The first Note allows valves and blind flanges located in high radiation areas to be verified by use of administrative controls. Allowing verification by administrative controls is considered acceptable since access to these areas is typically restricted during MODES 1, 2, and 3 for ALARA reasons. Therefore, the probability of misalignment of these isolation devices, once they have been verified to be in the

proper position, is low. A second Note has been included to clarify that PCIVs that are open under administrative controls are not required to meet the SR during the time that the PCIVs are open.

SR 3.6.1.3.3

This SR verifies that each primary containment manual isolation valve and blind flange that is located inside primary containment and is required to be closed during accident conditions and is not locked, sealed, or otherwise

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BASES

SURVEILLANCE  
REQUIREMENTS

SR 3.6.1.3.3 (continued)

secured, is closed. The SR helps to ensure that post accident leakage of radioactive fluids or gases outside the primary containment boundary is within design limits. For these isolation devices inside primary containment, the Frequency defined as "Prior to entering MODE 2 or 3 from MODE 4 if primary containment was de-inerted while in MODE 4, if not performed within the previous 92 days" is appropriate since these isolation devices are operated under administrative controls and the probability of their misalignment is low.

Two Notes have been added to this SR. The first Note allows valves and blind flanges located in high radiation areas to be verified by use of administrative controls. Allowing verification by administrative controls is considered acceptable since the primary containment is inerted and access to these areas is typically restricted during MODES 1, 2, and 3 for ALARA and personnel safety reasons. Therefore, the probability of misalignment of these isolation devices, once they have been verified to be in their proper position, is low. A second Note has been included to clarify that PCIVs that are open under administrative controls are not required to meet the SR during the time that the PCIVs are open.

SR 3.6.1.3.4

The traversing incore probe (TIP) shear isolation valves are actuated by explosive charges. Actuation and monitoring circuitry is provided in the main control room. Surveillance of explosive charge continuity provides assurance that TIP valves will actuate when required. The circuitry is such that a light illuminates upon loss of explosive charge continuity. Ensuring that the light illuminates when voltage is applied and that it is extinguished when installed in the circuit provides assurance of explosive valve continuity. Other administrative controls, such as those that limit the shelf life of the explosive charges, must be followed. The 31 day Frequency is based on operating experience that has demonstrated the reliability of the explosive charge continuity.

(continued)

BASES

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ACTIONS

D.1, D.2, and D.3 (continued)

any action. If moving fuel while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations.

Therefore, in either case, inability to suspend movement of irradiated fuel assemblies would not be a sufficient reason to require a reactor shutdown.

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SURVEILLANCE  
REQUIREMENTS

SR 3.6.4.2.1

This SR verifies that each secondary containment manual isolation valve and blind flange that is not locked, sealed, or otherwise secured and is required to be closed during accident conditions is closed. The SR helps to ensure that post accident leakage of radioactive fluids or gases outside of the secondary containment boundary is within design limits. This SR does not require any testing or valve manipulation. Rather, it involves verification that those isolation devices in secondary containment that are capable of being mispositioned are in the correct position.

Since these isolation devices are readily accessible to personnel during normal operation and verification of their position is relatively easy, the 31 day Frequency was chosen to provide added assurance that the isolation devices are in the correct positions.

Two Notes have been added to this SR. The first Note applies to valves and blind flanges located in high radiation areas and allows them to be verified by use of administrative controls. Allowing verification by administrative controls is considered acceptable, since access to these areas is typically restricted during MODES 1, 2, and 3 for ALARA reasons. Therefore, the probability of misalignment of these isolation devices, once they have been verified to be in the proper position, is low.

A second Note has been included to clarify that SCIVs that are open under administrative controls are not required to meet the SR during the time the SCIVs are open.

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BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.6.1.3.1 (continued)

allowed to be open for limited periods of time. The 31 day Frequency is consistent with other PCIV requirements discussed in SR 3.6.1.3.2.

SR 3.6.1.3.2

This SR verifies that each primary containment isolation manual valve and blind flange that is located outside primary containment and is required to be closed during accident conditions and is not locked, sealed, or otherwise secured, is closed. The SR helps to ensure that post accident leakage of radioactive fluids or gases outside the primary containment boundary is within design limits.

This SR does not require any testing or valve manipulation. Rather, it involves verification that those isolation devices outside primary containment, and capable of being mispositioned, are in the correct position. Since verification of valve position for isolation devices outside primary containment is relatively easy, the 31 day Frequency was chosen to provide added assurance that the isolation devices are in the correct positions.

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SR 3.6.1.3.3

This SR verifies that each primary containment manual isolation valve and blind flange that is located inside primary containment and is required to be closed during accident conditions and is not locked, sealed, or otherwise

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BASES

SURVEILLANCE  
REQUIREMENTS

SR 3.6.1.3.3 (continued)

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BASES

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ACTIONS

D.1, D.2, and D.3 (continued)

any action. If moving fuel while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations.

Therefore, in either case, inability to suspend movement of irradiated fuel assemblies would not be a sufficient reason to require a reactor shutdown.

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SURVEILLANCE  
REQUIREMENTS

SR 3.6.4.2.1

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A second Note has been included to clarify that SCIVs that are open under administrative controls are not required to meet the SR during the time the SCIVs are open.

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Enclosure 5

Edwin I. Hatch Nuclear Plant  
Supplement to Request to Revise Technical Specifications to  
Implement Previously Approved Generic Changes

Marked-Up Technical Specifications and Bases Pages

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.4.2.1	<p>-----NOTES-----</p> <ol style="list-style-type: none"> <li>1. Valves and blind flanges in high radiation areas may be verified by use of administrative means.</li> <li>2. Not required to be met for SCIVs that are open under administrative controls.</li> </ol> <p>-----</p> <p>Verify each secondary containment isolation manual valve and blind flange that is required to be closed during accident conditions is closed.</p>	31 days
SR 3.6.4.2.2	Verify the isolation time of each power operated and each automatic SCIV is within limits.	92 days
SR 3.6.4.2.3	Verify each automatic SCIV actuates to the isolation position on an actual or simulated actuation signal.	18 months

not locked, sealed, or otherwise secured and is

**SURVEILLANCE REQUIREMENTS**

SURVEILLANCE	FREQUENCY
<p>SR 3.6.4.2.1</p> <p>-----NOTES-----</p> <ol style="list-style-type: none"> <li>1. Valves and blind flanges in high radiation areas may be verified by use of administrative means.</li> <li>2. Not required to be met for SCIVs that are open under administrative controls.</li> </ol> <p>-----</p> <p>Verify each secondary containment isolation manual valve and blind flange that is required to be closed during accident conditions is closed.</p>	<p>31 days</p>
<p>SR 3.6.4.2.2</p> <p>Verify the isolation time of each power operated and each automatic SCIV is within limits.</p>	<p>92 days</p>
<p>SR 3.6.4.2.3</p> <p>Verify each automatic SCIV actuates to the isolation position on an actual or simulated actuation signal.</p>	<p>18 months</p>

not locked,  
sealed, or otherwise  
secured and is

BASES

SURVEILLANCE  
REQUIREMENTS

SR 3.6.1.3.1 (continued)

allowed to be open for limited periods of time. The 31 day Frequency is consistent with other PCIV requirements discussed in SR 3.6.1.3.2.

SR 3.6.1.3.2

This SR verifies that each primary containment isolation manual valve and blind flange that is located outside primary containment and is required to be closed during accident conditions is closed. The SR helps to ensure that post accident leakage of radioactive fluids or gases outside the primary containment boundary is within design limits.

This SR does not require any testing or valve manipulation. Rather, it involves verification that those isolation devices outside primary containment, and capable of being mispositioned, are in the correct position. Since verification of valve position for isolation devices outside primary containment is relatively easy, the 31 day Frequency was chosen to provide added assurance that the isolation devices are in the correct positions.

Two Notes have been added to this SR. The first Note allows valves and blind flanges located in high radiation areas to be verified by use of administrative controls. Allowing verification by administrative controls is considered acceptable since access to these areas is typically restricted during MODES 1, 2, and 3 for ALARA reasons. Therefore, the probability of misalignment of these isolation devices, once they have been verified to be in the proper position, is low. A second Note has been included to clarify that PCIVs that are open under administrative controls are not required to meet the SR during the time that the PCIVs are open.

SR 3.6.1.3.3

This SR verifies that each primary containment manual isolation valve and blind flange that is located inside primary containment and is required to be closed during accident conditions is closed. The SR helps to ensure that post accident leakage of radioactive fluids or gases outside

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and is not locked, sealed, or otherwise secured,

BASES

SURVEILLANCE  
REQUIREMENTS

SR 3.6.1.3.1 (continued)

allowed to be open for limited periods of time. The 31 day Frequency is consistent with other PCIV requirements discussed in SR 3.6.1.3.2.

SR 3.6.1.3.2

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SR 3.6.1.3.3

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and is not locked, sealed, or otherwise secured,

BASES

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ACTIONS

D.1, D.2, and D.3 (continued)

any action. If moving fuel while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations.

Therefore, in either case, inability to suspend movement of irradiated fuel assemblies would not be a sufficient reason to require a reactor shutdown.

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SURVEILLANCE  
REQUIREMENTS

SR 3.6.4.2.1

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A second Note has been included to clarify that SCIVs that are open under administrative controls are not required to meet the SR during the time the SCIVs are open.

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BASES

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ACTIONS

D.1, D.2, and D.3 (continued)

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SURVEILLANCE  
REQUIREMENTS

SR 3.6.4.2.1

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Since these isolation devices are readily accessible to personnel during normal operation and verification of their position is relatively easy, the 31 day Frequency was chosen to provide added assurance that the isolation devices are in the correct positions.

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