B 3.5 PASSIVE CORE COOLING SYSTEM (PXS)

B 3.5.1 Accumulators

BASES

BACKGROUND

The functions of the PXS accumulators are to supply water to the reactor vessel during the refill phase of a large break Loss Of Coolant Accident (LOCA), to provide Reactor Coolant System (RCS) makeup for a small break LOCA, and to provide Reactor Coolant System (RCS) boration for steam line breaks (Ref. 2).

The blowdown phase of a large break LOCA is the initial period of the transient during which the RCS departs from equilibrium conditions, and heat from fission product decay, hot internals, and the vessel continues to be transferred to the reactor coolant. The blowdown phase of the transient ends when the RCS pressure falls to a value approaching that of the containment atmosphere.

In the refill phase of a LOCA, which immediately follows the blowdown phase, reactor coolant inventory has vacated the core through steam flashing and ejection out through the break. The core is essentially in adiabatic heatup. The accumulator inventory is available to help fill voids in the lower plenum and reactor vessel downcomer so as to establish a recovery level at the bottom of the core and ongoing reflood of the core.

The accumulators are pressure vessels, partially filled with borated water and pressurized with nitrogen gas. The accumulators are passive components, since no operator or control actions are required for them to perform their function. Internal accumulator pressure is sufficient to discharge the accumulator contents to the RCS, if RCS pressure decreases below the static accumulator pressure.

Each accumulator is piped into the reactor vessel via an accumulator line and is isolated from the RCS by two check valves in series.

A normally open motor operated valve is arranged in series with the check valves. Upon initiation of a safeguards actuation signal, the normally open valves receive a confirmatory open signal.

(continued)

BASES

BACKGROUND (continued)	Power lockout and position alarms ensure that the valves meet the requirements of the Institute of Electrical and Electronic Engineers (IEEE) Standard 279-1971 (Ref. 1) for "operating bypasses" and that the accumulators will be available for injection without being subject to a single failure. The accumulator size, water volume, and nitrogen cover pressure are selected so that both of the accumulators are sufficient to recover the core cooling before significant clad melting or zirconium water reaction can occur following a large break LOCA. One accumulator is adequate during a small break LOCA where the entire contents of one accumulator can possibly be lost via the pipe break. This accumulator performance is based on design basis accident (DBA) assumptions and models (Ref. 3). The Probabilistic Risk Assessment (PRA) (Ref. 4) shows that one of the two accumulators is sufficient for a large break LOCA and that none of the accumulators are required for small break LOCAs, assuming that at least one core makeup tank (CMT) is available.
APPLICABLE SAFETY ANALYSES	The accumulators are assumed to be OPERABLE in both the large and small break LOCA analyses at full power (Ref. 3) that establish the acceptance limits for the accumulators. Reference to the analyses for these DBAs is used to assess changes in the accumulators as they relate to the acceptance limits. For a small break LOCA, a large range of break sizes and locations were analyzed to verify the adequacy of the design. The cases analyzed include the rupture of one 8 inch direct vessel injection line and several smaller break sizes. Acceptable PXS performance was demonstrated. For a larger LOCA, including a double ended RCS piping rupture, the PXS can provide a sufficiently large flow rate, assuming both accumulators are OPERABLE, to quickly fill the reactor vessel lower plenum and downcomer. Both accumulators, in conjunction with the CMTs, ensure rapid reflooding of the core. For a large LOCA, both lines are available since an 8 inch line break would be a small LOCA.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

Following a non-LOCA event such as a steamline break, the RCS experiences a decrease in temperature and pressure due to an increase in energy removal by the secondary system. The cooldown results in a reduction of the core SHUTDOWN MARGIN with a potential for return to power. During such an event the accumulators provide injection of borated water to assist the CMT's boration to mitigate the reactivity transient and ensure the core remains shut down.

The accumulators satisfy Criterion 3 of the NRC Policy Statement.

LCO

This LCO establishes the minimum conditions necessary to ensure that sufficient accumulator flow will be available, assuming the minimum requirements of all other PXS components are met, to meet the necessary acceptance criteria established for core cooling by 10 CFR 50.46 (Ref. 5). These conditions are:

a. Maximum fuel element cladding temperature is ≤ 2200°F;

b. Maximum cladding oxidation is ≤ 0.17 times the total cladding thickness before oxidation;

c. Maximum hydrogen generation from a zirconium-water reaction is ≤ 0.01 times the hypothetical amount that would be generated if all of the metal in the cladding cylinders surrounding the fuel, excluding the cladding surrounding the plenum volume, were to react; and

d. The core is maintained in a coolable geometry.

Since the accumulators discharge during the blowdown phase of a LOCA, they do not contribute to the long term cooling requirements of 10 CFR 50.46.

For an accumulator to be OPERABLE, the isolation valve must be fully open with power removed, and the limits established in the Surveillance Requirements for contained water, boron concentration, and nitrogen cover pressure must be met.

(continued)

BASES (continued)

APPLICABILITY

In MODES 1 and 2, and in MODES 3 and 4 with RCS pressure > 1000 psig, the accumulator OPERABILITY requirements are based on full power operation. Although cooling requirements decrease as power decreases, the accumulators are still required to provide core cooling as long as elevated RCS pressures and temperatures exist.

This LCO is only applicable at pressures > 1000 psig. At pressures ≤ 1000 psig, the rate of RCS blowdown is such that adequate injection flow from other sources exists to retain peak clad temperatures below the 10 CFR 50.46 limit of 2200°F.

In MODES 3 and 4 with RCS pressure ≤ 1000 psig, and in MODES 5 and 6, the accumulator motor operated isolation valves are closed to isolate the accumulators from the RCS. This allows the RCS cooldown and depressurization without discharging the accumulators into the RCS or requiring depressurization of the accumulators.

ACTIONS

A.1

If the boron concentration of one accumulator is not within limits, action must be taken to restore the parameter.

Deviations in boron concentration are expected to be slight, considering that the pressure and volume are verified once per 24 hours. For one accumulator, boron concentration not within limits will have an insignificant effect on the ability of the accumulators to perform their safety function. Therefore, a Completion Time of 72 hours is considered to be acceptable.

B.1

If one accumulator is inoperable for a reason other than Condition A, the accumulator must be returned to OPERABLE status within 8 hours. With one accumulator inoperable, the remaining accumulator is capable of providing the required safety function. The effectiveness of one accumulator is demonstrated in analysis performed to justify PRA success criteria (Ref. 4). The analysis contained in this reference shows that for a range of events including small LOCAs and large LOCAs that with one accumulator unavailable the core is adequately cooled.

(continued)

BASES

ACTIONS

B.1 (continued)

For example, Section 9.1.2 of Reference 4 shows that for a double-ended rupture of a DVI line that adequate core cooling is provided without any accumulator injection. The DVI break LOCA analysis was performed with the computer code used to analyze LOCAs in Chapter 15 (NOTRUMP). The analysis was performed with conservative inputs and assumptions. The assumptions included multiple failures which would not have to be assumed to support this Technical Specification Bases, including the failure of the PRHR HX, all ADS stage 1/2/3 paths, one of four ADS stage 4 path, and failure to close one containment vent path. These additional failures provide significant margin with respect to this LCO.

Section 9.2.2 of Reference 4 shows that for a large LOCA that adequate core cooling is provided with one accumulator unavailable and the other injecting. The large break LOCA analysis was performed with the computer code used to analyze LOCAs in Chapter 15 (WCOBRA TRAC). The analysis was performed with conservative inputs and assumptions. The assumptions included multiple failures which would not have to be assumed to support this Technical Specification Bases, including the failure of one CMT. This additional failure provides significant margin with respect to this LCO.

These analyses provide a high confidence that with the unavailability of one accumulator the core can be cooled following design bases accidents.

C.1

If the Required Action and associated Completion Time of Conditions A or B are not met, the plant must be placed in a MODE or condition in which the LCO does not apply. This is done by placing the plant in MODE 3 within 6 hours and with pressurizer pressure to ≤ 1000 psig within 12 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

D.1

If more than one accumulator is inoperable, the plant is in a condition outside the accident analyses; therefore, LCO 3.0.3 must be entered immediately.

(continued)

BASES (continued)

SURVEILLANCE REQUIREMENTS

SR 3.5.1.1

Each accumulator valve should be verified to be fully open every 12 hours. This verification ensures each accumulator isolation valve is fully open, as indicated in the control room, and timely discovery if a valve should be less than fully open. If an isolation valve is not fully open, the rate of injection to the RCS would be reduced. Although a motor operated valve position should not change with power removed, a partially closed valve could result in not meeting DBA analyses assumptions (Ref. 3). A 12 hour Frequency is considered reasonable in view of the other administrative controls which ensure that a mispositioned isolation valve is unlikely.

SR 3.5.1.2 and 3.5.1.3

Verification every 12 hours of the borated water volume and nitrogen cover pressure in each accumulator is sufficient to ensure adequate injection during a LOCA. Because of the static design of the accumulator, a 12 hour Frequency usually allows the operator to identify changes before limits are reached. Considering that control room alarms are provided for both parameters these limits are effectively subject to continuous monitoring. The 12 hour Frequency is considered reasonable considering the availability of the control room alarms and the likelihood that, with any deviation which may occur, the accumulators will perform their safety function with slight deviations in these parameters.

SR 3.5.1.4

The boron concentration should be verified to be within required limits for each accumulator every 31 days, since the static design of the accumulators limits the ways in which the concentration can be changed. The 31 day Frequency is adequate to identify changes that could occur from mechanisms such as in-leakage. Sampling the affected accumulator within 6 hours after a 3% volume increase will promptly identify whether the volume change has caused a reduction of boron concentration to below the required limit.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.5.1.5

Verification every 31 days that power is removed from each accumulator isolation valve operator when the pressurizer pressure is ≥ 2000 psig ensures that an active failure could not result in the undetected closure of an accumulator motor operated isolation valve. If this were to occur, reduced accumulator capacity might be available for injection following a DBA that required operation of the accumulators. Since power is removed under administrative control, the 31 day Frequency will provide adequate assurance that power is removed.

This SR allows power to be supplied to the motor operated isolation valves when pressurizer pressure is < 2000 psig, thus allowing operational flexibility by avoiding unnecessary delays to manipulate the breakers during unit startup or shutdowns.

Should closure of a valve occur, the safeguard actuation signal provided to the valve would open a closed valve, if required.

SR 3.5.1.6

This SR requires performance of a system performance test of each accumulator to verify flow capabilities. The system performance test demonstrates that the accumulator injection line resistance assumed in accident analyses is maintained. Although the likelihood that system performance would degrade with time is low, it is considered prudent to periodically verify system performance. The System Level Operability Testing Program provides specific test requirements and acceptance criteria.

REFERENCES

1. IEEE Standard 279-1971, "Criteria for Protection Systems for Nuclear Power Generating Stations."
2. Section 6.3 "Passive Core Cooling System."
3. Section 15.6 "Decrease in Reactor Coolant Inventory."
4. "AP600 PRA Thermal/Hydraulic Uncertainty Evaluation for Passive System Reliability," WCAP-14800, June 1997.
5. 10 CFR 50.46.

B 3.5 PASSIVE CORE COOLING SYSTEM (PXS)

B 3.5.2 Core Makeup Tanks (CMTs) – Operating

BASES

BACKGROUND

Two redundant CMTs provide sufficient borated water to assure Reactor Coolant System (RCS) reactivity and inventory control for all design basis accidents (DBAs), including both loss of coolant accident (LOCA) events and non-LOCA events (Ref. 1).

The CMTs are cylindrical tanks with hemispherical upper and lower heads. They are made of carbon steel and clad on the internal surfaces with stainless steel. They are located in containment at an elevation slightly above the reactor coolant loops. Each tank is full of borated water at > 3400 ppm. During normal operation, the CMTs are maintained at RCS pressure through a normally open pressure balance line from the cold leg.

The outlet line from each CMT is connected to one of two direct vessel injection lines, which provides an injection path for the water supplied by the CMT. The outlet line from each CMT is isolated by parallel, normally closed, fail open valves. Upon receipt of a safeguards actuation signal, these four valves open to align the CMTs to the RCS.

The CMTs will inject to the RCS as inventory is lost and steam or reactor coolant is supplied to the CMT to displace the water that is injected. Steam or reactor coolant is provided to the CMT through the cold leg balance line, depending upon the specific event that has occurred. The inlet line from the cold leg is sized for LOCA events, where the cold legs become voided and higher CMT injection flows are required.

The injection line from each CMT contains a flow tuning orifice that is used to provide a mechanism for the field adjustment of the injection line resistance. The orifice is used to establish the required flow rates for the associated plant conditions assumed in the CMT design. The CMT flow is based on providing injection for a minimum of 20 minutes after CMT actuation.

The CMT size and injection capability are selected to provide adequate RCS boration and safety injection for the limiting DBA. One CMT is adequate for this function during

(continued)

BASES

BACKGROUND (continued)	a small break LOCA where one CMT completely spills via the pipe break (Ref. 2). The Probabilistic Risk Assessment (PRA) (Ref. 3) shows that none of the CMTs are required for small LOCAs, assuming that at least one accumulator is available.
APPLICABLE SAFETY ANALYSES	The CMTs are assumed to be OPERABLE to provide emergency boration and core makeup when the Chemical and Volume Control System (CVS) is inoperable, and to mitigate the consequences of any DBA which requires the safety injection of borated water (Ref. 2). Following a non-LOCA event such as a steamline break, the RCS experiences a decrease in temperature and pressure due to an increase in energy removal by the secondary system. The cooldown results in a reduction of the core SHUTDOWN MARGIN due to the negative moderator temperature coefficient, with a potential for return to power. The actuation of the CMTs following this event provides injection of borated water to mitigate the reactivity transient and ensure the core remains shut down. In the case of a steam generator tube rupture (SGTR), CMT injection provides borated water to compensate for RCS LEAKAGE. In the case of an RCS leak of 10 gallons per minute, the CMTs can delay depressurization for at least 10 hours, providing makeup to the RCS and remain able to provide the borated water to compensate for RCS shrinkage and to assure the RCS boration for a safe shutdown. In the case of a LOCA, the CMTs provide a relatively large makeup flow rate for approximately 20 minutes, in conjunction with the accumulators to provide the initial core cooling. CMTs satisfy Criterion 3 of the NRC Policy Statement.
LCO	This LCO establishes the minimum conditions necessary to ensure that sufficient CMT flow will be available, assuming the minimum requirements of all other PXS components are met, to meet the initial conditions assumed in the safety

(continued)

BASES

LCO (continued)

analyses. The volume of each CMT represents 100% of the total injected flow assumed in LOCA analysis. If the injection line from a single CMT to the vessel breaks, no single active failure on the other CMT will prevent the injection of borated water into the vessel. Thus the assumptions of the LOCA analysis will be satisfied.

For non-LOCA analysis, two CMTs are assumed. Note that for non-LOCA analysis, the accident cannot disable a CMT.

APPLICABILITY

In MODES 1, 2, 3, and 4 when the RCS is not being cooled by the Normal Residual Heat Removal System (RNS) the CMTs are required to be OPERABLE to provide borated water for RCS inventory makeup and reactivity control following a design basis event and subsequent cooldown.

The CMT requirements in MODE 5 with the RCS pressure boundary intact are specified in LCO 3.5.3, "Core Makeup Tanks (CMTs) – Shutdown, RCS Intact."

The CMTs are not required to be OPERABLE while in MODE 5 with the RCS pressure boundary open or in MODE 6 because the RCS is depressurized and borated water can be supplied from the In-containment Refueling Water Storage Tank (IRWST), if needed.

In the unlikely event of a total loss of AC power sources, coupled with an inoperable Passive Residual Heat Removal Heat Exchanger (PRHR HX) (beyond DBA), the CMTs may be used in a feed and bleed sequence to remove heat from the RCS.

ACTIONS

A.1

With one outlet isolation valve inoperable on one CMT, action must be taken to restore the valve. In this Condition, the CMT is capable of performing its safety function, provided a single failure of the remaining parallel isolation valve does not occur. A Completion Time of 72 hours is acceptable for two train ECCS systems which are capable of performing their safety function without a single failure.

(continued)

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.5.4.1	Verify the outlet manual isolation valve is fully open.	12 hours
SR 3.5.4.2	Verify the inlet motor operated isolation valve is open.	12 hours
SR 3.5.4.3	Verify the volume of noncondensible gases in the PRHR HX inlet line is $\leq$ [0.4] ft^3.	24 hours
SR 3.5.4.4	Verify that power is removed from the inlet motor operated isolation valve.	31 days
SR 3.5.4.5	Verify both PRHR air operated outlet isolation valves and both IRWST gutter isolation valves are OPERABLE by stroking open the valves.	In accordance with the System Level Inservice Testing Program
SR 3.5.4.6	Verify PRHR HX heat transfer performance in accordance with the System Level Operability Testing Program.	10 years
SR 3.5.4.7	Verify by visual inspection that the IRWST gutters are not restricted by debris.	24 months

3.5 PASSIVE CORE COOLING SYSTEM (PXS)

3.5.5 Passive Residual Heat Removal Heat Exchanger (PRHR HX) - Shutdown, RCS Intact

LCO 3.5.5 The PRHR HX shall be OPERABLE.

-------------------------NOTE-------------------------
When any reactor coolant pumps (RCPs) are operating, at least one RCP must be operating in loop one.

APPLICABILITY: MODE 4 with the RCS cooling provided by the Normal Residual Heat Removal System (RNS),
MODE 5 with the RCS pressure boundary intact.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One air operated outlet isolation valve inoperable.	A.1 Restore air operated outlet valve to OPERABLE status.	72 hours
B. One air operated IRWST gutter isolation valve inoperable.	B.1 Restore air operated IRWST gutter isolation valve to OPERABLE status.	72 hours
C. Presence of non-condensible gases in the high point vent.	C.1 Vent noncondensible gases.	24 hours
D. PRHR HX inoperable for reasons other than A, B, or C.	D.1 Restore PRHR HX to OPERABLE status.	8 hours

(continued)

BASES

ACTIONS (continued)

F.1

If the Required Action or associated Completion Time of Condition A, B, C, D, or E are not met or the LCO is not met for reasons other than Conditions A through E, the plant must be brought to MODE 5 where the probability and consequences on an event are minimized. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE REQUIREMENTS

SR 3.5.2.1 and SR 3.5.2.2

Verification every 24 hours and 7 days that the temperature and the volume, respectively, of the borated water in each CMT is within limits ensures that when a CMT is needed to inject water into the RCS, the injected water temperature and volume will be within the limits assumed in the accident analysis. The 24 hour Frequency is adequate, based on the fact that no mechanism exists to rapidly change the temperature of a large tank of water such as a CMT. These parameters are normally monitored in the control room by indication and alarms. Also, there are provisions for monitoring the temperature of the inlet and outlet lines to detect in-leakage which may affect the CMT water temperature.

SR 3.5.2.3

Each CMT inlet isolation valve must be verified to be fully open each 12 hours. Frequent verification is considered to be important, since a CMT can not perform its safety function, if the valve is closed. Control room instrumentation is normally available for this verification.

SR 3.5.2.4

Verification that excessive amounts of noncondensible gases are not present in the inlet line is required every 24 hours. The inlet line of each CMT has a vertical section of pipe which serves as a high point collection point for noncondensible gases. Control room indication of the water level in the high point collection point is available to

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.5.2.4 (continued)

verify that noncondensible gases have collected to the extent that the water level is depressed below the allowable level. The 24 hour Frequency is based on the expected low rate of gas accumulation and the availability of control room indication.

SR 3.5.2.5

Verification every 7 days that the boron concentration in each CMT is within the required limits ensures that the reactivity control from each CMT, assumed in the safety analysis, will be available as required. The 7 day Frequency is adequate to promptly identify changes which could occur from mechanisms such as in-leakage.

SR 3.5.2.6

Verification that the redundant outlet isolation valves are OPERABLE by stroking the valves open ensures that each CMT will function as designed when these valves are actuated. Prior to opening the outlet isolation valves, the inlet isolation valve should be closed temporarily. Closing the inlet isolation valve ensures that the CMT contents will not be diluted or heated by flow from the RCS. Upon completion of the test, the inlet isolation valves must be opened. The Surveillance Frequency references the inservice testing requirements.

SR 3.5.2.7

This SR requires performance of a system performance test of each CMT to verify flow capabilities. The system performance test demonstrates that the CMT injection line resistance assumed in DBA analyses is maintained. Although the likelihood that system performance would degrade with time is low, it is considered prudent to periodically verify system performance. The System Level Operability Testing Program provides specific test requirements and acceptance criteria.

REFERENCES

1. Section 6.3, "Passive Core Cooling System."

2. Chapter 15, "Accident Analysis."

3. "AP600 PRA Thermal/Hydraulic Uncertainty Evaluation for Passive System Reliability," WCAP-14800, June 1997.

B 3.5 PASSIVE CORE COOLING SYSTEM (PXS)

B 3.5.3 Core Makeup Tanks (CMTs) - Shutdown, RCS Intact

BASES

BACKGROUND	A description of the CMTs is provided in the Bases for LCO 3.5.2, "Core Makeup Tanks - Operating."
APPLICABLE SAFETY ANALYSES	When the plant is shutdown with the Reactor Coolant System (RCS) pressure boundary intact, the CMT and Passive Residual Heat Removal (PRHR) are the preferred methods for mitigation of postulated events such as loss of normal decay heat removal capability (either loss of Startup Feedwater or loss of normal residual heat removal system). The CMT and PRHR are preferred because the RCS pressure boundary can remain intact, thus preserving one of the barriers to fission product release. For these events, the PRHR provides the safety related heat removal path. And the CMT maintains RCS inventory control. These events can also be mitigated by In-containment Refueling Water Storage Tank (IRWST) injection; however, the RCS must be depressurized (vented) in order to facilitate IRWST injection. Since no loss of coolant accidents (LOCAs) are postulated during MODES 5 and 6, the possibility of a break in the direct vessel injection line is not considered. As a result, only one CMT is required to be available to provide core cooling in response to postulated events. The two parallel CMT outlet isolation valves ensure that injection from one CMT occurs in the event of a single active failure. CMTs satisfy Criterion 3 of the NRC Policy Statement.
LCO	This LCO establishes the minimum conditions necessary to ensure that one CMT will be available for RCS inventory control in the event of the loss of normal decay heat removal capability. The two CMT outlet isolation valves must be OPERABLE to ensure that at least one valve will operate, assuming that the other valve is disabled by a single active failure.

(continued)

BASES (continued)

APPLICABILITY

In MODE 4 without steam generator heat removal and in MODE 5 with the RCS pressure boundary intact, one CMT is required to provide borated water to the RCS in the event the nonsafety related chemical and volume control system makeup pumps are not available to provide RCS inventory control.

The CMT requirements in MODES 1, 2, 3, and 4 are specified in LCO 3.5.2, "Core Makeup Tanks (CMTs) – Operating."

The CMTs are not required to be OPERABLE while in MODE 5 with the RCS open or in MODE 6 because the RCS is depressurized and borated water can be supplied from the IRWST, if needed.

ACTIONS

A.1

With one outlet isolation valve inoperable action must be taken to restore the valve. In this Condition the CMT is capable of performing its safety function, provided a single failure of the remaining parallel isolation valve does not occur. A Completion Time of 72 hours is consistent with times normally applied to an ECCS system which is capable of performing its safety function without a single failure.

B.1

If the water temperature or boron concentration in the CMT is not within limits, it must be returned to within limits within 72 hours. With the temperature above the limit the makeup capability assumed in the safety analysis may not be available. With the boron concentration not within limits, the ability to maintain subcriticality may be degraded.

Because the mechanisms for significantly altering these parameters in the CMT are limited, it is probable that more than the required amount of boron and cooling capacity will be available to meet the conditions assumed in the safety analysis. Therefore, the 72 hour Completion Time is acceptable.

(continued)

BASES

ACTIONS (continued)

C.1

With the required CMT inoperable for reasons other than Condition A or B operation of the CMT may not be available. Action must be taken to restore the inoperable CMT to OPERABLE status within 8 hours. LOCAs are not postulated during the MODEs when this LCO is applicable. The only safety function is to provide leakage makeup in case normal RCS makeup is unavailable. The 8 hour Completion Time is based on the availability of injection from the IRWST to provide RCS makeup. The ability of the IRWST to provide RCS injection is demonstrated by analysis performed to show that IRWST injection together with ADS venting provides adequate core cooling. Such analysis was performed for the loss of RNS cooling during midloop operations (Ref. 2). The analysis was performed in support of the AP600 Shutdown Evaluation Report with the computer code used to analyze LOCAs in Chapter 15. The analysis was performed with conservative inputs and assumptions. The analysis showed that the core did not uncover during the accident.

D.1

If the Required Action or associated Completion Time of Conditions A, B, or C are not met or the LCO is not met for reasons other than Conditions A through C, action must be initiated, immediately, to place the plant in a MODE where this LCO does not apply. Action must be initiated, immediately, to place the plant in MODE 5 with RCS pressure boundary open and ≥ 20% pressurizer level. In this condition, core cooling and RCS makeup are provided by IRWST injection and sump recirculation. Opening of the ADS valves ensures that IRWST injection can occur.

SURVEILLANCE REQUIREMENTS

SR 3.5.3.1

The LCO 3.5.2 Surveillance Requirements (SR 3.5.2.1 through 3.5.2.7) are applicable to the CMT required to be OPERABLE. The Frequencies associated with each specified SR are applicable. Refer to the corresponding Bases for LCO 3.5.2 for a discussion of each SR.

REFERENCES

1. Section 6.3, "Passive Core Cooling System."

2. WCAP-14837, "AP600 Shutdown Evaluation Report," Revision 3, March 1998.

B 3.5 PASSIVE CORE COOLING SYSTEM (PXS)

B 3.5.4 Passive Residual Heat Removal Heat Exchanger (PRHR HX) – Operating

BASES

BACKGROUND

The normal heat removal mechanism is the steam generators, which are supplied by the startup feedwater system. However, this path utilizes non-safety related components and systems, so its failure must be considered. In the event the steam generators are not available to remove decay heat for any reason, including loss of startup feedwater, the heat removal path is the PRHR HX (Ref. 1).

The principle component of the PRHR HX is a 100% capacity heat exchanger mounted in the In-containment Refueling Water Storage Tank (IRWST). The heat exchanger is connected to the Reactor Coolant System (RCS) by a inlet line from one RCS hot leg, and an outlet line to the associated steam generator cold leg channel head. The inlet line to the passive heat exchanger contains a normally open, motor operated isolation valve. The outlet line is isolated by two parallel, normally closed air operated valves, which fail open on loss of air pressure or control signal. There is a vertical collection point at the top of the common inlet piping high point which serves as a gas collector. It is provided with level detectors that indicate when noncondensible gases have collected in this area. There are provisions to manually vent these gases to the IRWST.

The PRHR HX size and heat removal capability is selected to provide adequate core cooling for the limiting non-LOCA heatup Design Basis Accidents (DBAs) (Ref. 2). The Probability Risk Assessment (PRA) (Ref. 3) shows that PRHR HX is not required assuming that passive feed and bleed is available. Passive feed and bleed uses the Automatic Depressurization System (ADS) for bleed and the CMTs/accumulators/IRWST for feed.

APPLICABLE SAFETY ANALYSES

In the event of a non-LOCA DBA during normal operation, the PRHR HX is automatically actuated to provide decay heat removal path in the event the normal path through the steam generators is not available (Ref. 2).

The non-LOCA events which establish the PRHR HX parameters are those involving a decrease in heat removal by the

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

secondary system, such as loss of main feedwater or other failure in the feedwater system. Since the PRHR HX is passive, it will mitigate the consequences of these events with a complete loss of all AC power sources. The PRHR HX actuates when the CMTs are actuated during LOCA events.

The PRHR HX satisfies Criterion 3 of the NRC Policy Statement.

LCO

This LCO requires that the PRHR HX be OPERABLE so that it can respond appropriately to the DBAs which may require its operation. Since this is a passive component, it does not require the actuation of active components such as pumps for its operability and will be OPERABLE if the inlet valves are in their normally open position, and the normally closed, fail open outlet valves open on receipt of an actuation signal.

In addition to the appropriate valve configuration, operability may be impaired by flow blockage caused by noncondensible gases collecting in the system. Thus the absence of noncondensible gases in the high point is necessary for system operability.

The note requires a reactor coolant pump (RCP) to be operating in the loop with the PRHR HX, Loop 1, if any RCPs are operating. If RCPs are only operating in Loop 2 and no RCPs are operating in Loop 1, there is a possibility there may be reverse flow in the PRHR HX.

APPLICABILITY

The PRHR HX must be OPERABLE in MODES 1, 2, 3, and 4 with the RCS not cooled by the Normal Residual Heat Removal System (RNS) if a plant cooldown is required and the normal cooldown path is not available. Under these conditions, the PRHR HX may be actuated to provide core cooling and to mitigate the consequences of a DBA.

The PRHR HX requirements in MODE 4 with RCS cooling provided by the RNS and in MODE 5 with the RCS pressure boundary intact are specified in LCO 3.5.5, "Passive Residual Heat Removal Heat Exchanger (PRHR HX) – Shutdown, RCS Intact."

The PRHR HX is not capable of natural circulation cooling of the RCS in MODE 5 with the RCS pressure boundary open or in MODE 6.

(continued)

BASES (continued)

ACTIONS

A.1

The outlet line from the PRHR HX is controlled by a pair of normally closed, fail open, air operated valves, arranged in parallel. Thus they are redundant and, if either valve is OPERABLE, the system can function at 100% capacity, assuming other operability conditions are met.

If one valve is inoperable, a Completion Time of 72 hours has been allowed to restore the inoperable valve(s) to OPERABLE status. This Completion Time is consistent with the Completion Times specified for other parallel redundant safety related systems.

B.1

With one air operated IRWST gutter isolation valve inoperable, the remaining isolation valve can function to drain the gutter to the IRWST. Action must be taken to restore the inoperable gutter isolation valve to OPERABLE status within 72 hours. The 72 hour Completion Time is acceptable based on the capability of the remaining valve to perform 100% of the required safety function assumed in the safety analyses.

C.1

Excessive amounts of noncondensible gases in the PRHR HX inlet line may interfere with the natural circulation flow of reactor coolant through the PRHR HX. The presence of some noncondensible gases does not mean that the PRHR HX is immediately inoperable, but that gases are collecting and should be vented. The venting of these gases requires containment entry to manually operate the appropriate vent valves. A Completion Time of 24 hours is acceptable considering that passive feed and bleed cooling is available to remove heat from the RCS.

D.1

If any of the above Required Actions have not been accomplished in the required Completion Time or the LCO is not met for reasons other than Conditions A, B, or C, the plant must be brought to MODE 4, with the RCS cooled by the

(continued)

BASES

ACTIONS

D.1 (continued)

RNS, where the probability and consequences on an event are minimized. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 4, with the RCS cooled by the RNS, within 24 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

E.1

With the LCO not met for reasons other than Condition A, B, or C, the PRHR HX must be restored within 8 hours. The 8 hour Completion Time is based on the availability of passive feed and bleed cooling to provide RCS heat removal. The effectiveness of feed and bleed cooling is demonstrated in analysis performed to justify PRA success criteria (Ref. 3). The analysis contained in this reference shows that for a range of events including loss of main feedwater, SGTR, and small LOCA (as small as 1/2") that feed and bleed cooling provides adequate core cooling.

For example, Section 6.1 of Reference 3 shows that for a loss of main feedwater or a SGTR event without the PRHR HX and no other failures, that feed and bleed cooling provides adequate core cooling without uncovering the core. In Section 9.1 of Reference 3, the analysis shows that for a 2" LOCA without the PRHR HX that feed and bleed cooling provides adequate core cooling without significant core heatup. The 2" LOCA analysis was performed with the computer code used to analyze LOCAs in Chapter 15 (NOTRUMP). The analysis was performed with conservative inputs and assumptions. Some of these assumptions include multiple failures which would not have to be assumed to support this Technical Specification Bases. The multiple failures include the failure of the one CMT, one accumulator, all ADS stage 1/2, one ADS stage 3, two of four ADS stage 4, three of four IRWST injection valves, and three of four containment recirculation valves.

These analyses provide a high confidence that with the unavailability of the PRHR HX the core can be cooled following design bases accidents.

(continued)

BASES

ACTIONS (continued)

F.1 and F.2

If the PRHR HX is not restored in accordance with Action E.1 within 8 hours, the plant must be placed in a MODE in which the LCO does not apply. This is accomplished by placing the plant in MODE 3 within 6 hours and in MODE 5 within 36 hours.

Action F.1 is modified by a Note which requires that prior to initiating cooldown of the plant to MODE 3, redundant means of providing SG feedwater be verified as operable. Possible means include main feedwater and startup feedwater pumps. With the PRHR HX and redundant means of feeding the SGs INOPERABLE, the unit is in a seriously degraded condition with no means for conducting a controlled cooldown. In such a condition, the unit should not be perturbed by any action, including a power change, that might result in a trip. If redundant means of feeding the SGs are not available, the plant should be maintained in the current MODE until redundant means are restored. LCO 3.0.3 and all other Required Actions shall be suspended until the redundant means are restored, because they could force the unit into a less safe condition.

Action F.2 is modified by a Note which requires that prior to stopping SG feedwater, redundant means of cooling the RCS to cold shutdown conditions must be verified as operable. One redundant means of cooling the RCS to cold shutdown includes the normal residual heat removal system (RNS) and its necessary support system (both component cooling system pumps and heat exchangers, and both service water system pumps and fans). Without availability of these redundant cooling means, the unit is in a seriously degraded condition with no means for continuing the controlled cooldown. Until the redundant cooling means are restored, heat removal using SG feedwater should be maintained. LCO 3.0.3 and all other Required Actions shall be suspended until the systems and equipment required for further cooldown are restored, because they could force the unit into a less safe condition.

SURVEILLANCE REQUIREMENTS

SR 3.5.4.1

Verification, using remote indication, that the common outlet manual isolation valve is fully open ensures that the flow path from the heat exchangers to the RCS is available.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.5.4.1 (continued)

Misalignment of this valve could render the heat exchanger inoperable. A 12 hour Frequency is reasonable considering that the valve is manually positioned and has control room position indication and alarm.

SR 3.5.4.2

Verification that the motor operated inlet valve is fully open, as indicated in the main control room, ensures timely discovery if the valve is not fully open. The 12 hour Frequency is consistent with the ease of verification, confirmatory open signals, and redundant series valve controls that prevent spurious closure.

SR 3.5.4.3

Verification that excessive amounts of noncondensible gases are not present in the inlet line is required every 24 hours. The inlet line of the PRHR HX has a vertical section of pipe which serves as a high point collection point for noncondensible gases. Control room indication of the water level in this high point collection point is available to verify that noncondensible gases have not collected to the extent that the water level is depressed below the allowable level. The 24 hour Frequency is based on the expected low rate of gas accumulation and the availability of control room indication.

SR 3.5.4.4

Verification is required to confirm that power is removed from the motor operated inlet isolation valve every 31 days. Removal of power from this valve reduces the likelihood that the valve will be inadvertently closed as a result of a fire. The 31 day Frequency is acceptable considering the frequent surveillance of valve position and that the valve has a confirmatory open signal

SR 3.5.4.5

Verification that both air operated outlet valves and both IRWST gutter isolation valves are OPERABLE ensures that the PRHR HX will actuate on command, with return flow from the gutter to the IRWST, since all other components of the

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.5.4.5 (continued)

system are normally in the OPERABLE configuration. Since these valves are redundant, if one valve is inoperable, the system can function at 100% capacity. Verification requiresthe actual operation of each valve through a full cycle to demonstrate operability. The Surveillance Frequency is provided in the Inservice Testing Program.

SR 3.5.4.6

This SR requires performance of a system performance test of the PRHR HX to verify system heat transfer capabilities. The system performance test demonstrates that the PRHR HX heat transfer assumed in accident analyses is maintained. Although the likelihood that system performance would degrade with time is low, it is considered prudent to periodically verify system performance. The System Level Operability Testing Program provides specific test requirements and acceptance criteria.

SR 3.5.4.7

This surveillance requires visual inspection of the IRWST gutters to verify that the return flow to the IRWST will not be restricted by debris. A Frequency of 24 months is adequate, since there are no known sources of debris with which the gutters could become restricted.

REFERENCES

1. Section 6.3, "Passive Core Cooling System."
2. Chapter 15, "Safety Analysis."
3. AP600 PRA Thermal/Hydraulic Uncertainty Evaluation for Passive System Reliability," WCAP-14800, June 1997.

B 3.5 PASSIVE CORE COOLING SYSTEM (PXS)

B 3.5.5 Passive Residual Heat Removal Heat Exchanger (PRHR HX) – Shutdown, RCS Intact

BASES

BACKGROUND	A description of the PRHR HX is provided in the Bases for LCO 3.5.4, "Passive Residual Heat Removal Heat Exchanger (PRHR HX) – Operating."
APPLICABLE SAFETY ANALYSES	In the event of a loss of normal decay heat removal capability during shutdown with the Reactor Coolant System (RCS) pressure boundary intact, the PRHR HX provides the preferred safety related heat removal path. When required, the PRHR HX is manually actuated and can maintain the RCS < 420°F. Alternatively, the heat removal function can be provided by depressurizing the RCS with the Automatic Depressurization System (ADS) and injection of the In-containment Refueling Water Storage Tank (IRWST) with containment closure capability provided. The PRHR HX is preferred because the RCS pressure boundary remains intact, thus preserving a barrier to fission product release. The PRHR HX satisfies Criterion 3 of the NRC Policy Statement.
LCO	This LCO requires the PRHR HX to be OPERABLE so that it can be placed in service in the event normal decay heat removal capability is lost. Since this a passive component, it does not require the actuation of active components such as pumps for its operability and will be OPERABLE if the inlet valves are in their normally open position, and the normally closed, fail open outlet valves open on receipt of an actuation signal. In addition to the appropriate valve configuration, operability may be impaired by flow blockage caused by noncondensible gases collecting in the system. Thus the absence of non-condensible gases in the high point is necessary for system operability. The note requires a reactor coolant pump (RCP) to be operating in loop one if any RCPs are operating. If RCPs

(continued)

BASES

LCO (continued)	are only operating in loop 2 and no RCPs are operating in loop 1, there is a possibility there may be reverse flow in the PRHR HX.

APPLICABILITY

The PRHR HX must be OPERABLE in MODE 4 with RCS cooling provided by the RNS and in MODE 5 with the RCS pressure boundary intact to provide decay heat removal in the event the normal residual heat removal system is not available.

The PRHR HX requirements in MODES 1, 2, 3, and 4 with RCS cooling not provided by the RNS are specified in LCO 3.5.4, "Passive Residual Heat Removal Heat Exchanger (PRHR HX) – Operating."

The PRHR HX is not capable of natural circulation cooling of the RCS in MODE 5 with the RCS pressure boundary open or in MODE 6.

ACTIONS

A.1

The outlet line from the PRHR HX is isolated by a pair of normally closed, fail open, air operated valves, arranged in parallel. They are redundant, and if either valve is OPERABLE the system can function at 100% capacity, assuming other operability conditions are met.

Since these valves are redundant, if one valve is inoperable, a Completion Time of 72 hours has been allowed to restore the inoperable valve to OPERABLE status. This Completion Time is consistent with the Completion Times specified for other parallel redundant safety related systems.

B.1

With one air operated IRWST gutter isolation valve inoperable, the remaining isolation valve can function to drain the gutter to the IRWST. Action must be taken to restore the inoperable gutter isolation valve to OPERABLE status within 72 hours. The 72 hour Completion Time is acceptable based on the capability of the remaining valve to perform 100% of the required safety function assumed in the safety analyses.

(continued)

BASES

ACTIONS (continued)	C.1 At the inlet piping high point there is a vertical chamber which serves as a collection point for noncondensible gases. This collection point is provided with detectors which alarm to indicate when gases have collected in this area. The presence of an alarm does not mean that PRHR HX is immediately inoperable, but that gases are collecting and should be vented. A Completion Time of 24 hours is acceptable, considering that passive feed and bleed cooling is available to revise heat from the RCS. D.1 With the LCO not met for reasons other than Condition A, B, or C, the PRHR HX must be restored within 8 hours. The 8 hour Completion Time is acceptable based on the availability of passive feed and bleed cooling to provide RCS heat removal. The effectiveness of feed and bleed cooling is discussed in the bases for LCO 3.4.4, Action E.1. E.1 If any of the above Required Actions have not been accomplished in the required Completion Time, or the LCO is not met for reasons other than Conditions A, B, C, or D, action must be initiated, immediately, to be in MODE 5 with the RCS pressure boundary open and pressurizer level ≥ 20%. The time to RCS boiling is maximized in the event of loss of normal decay heat removal capability, by maintaining a visible level in the pressurizer. Additionally, in this MODE the RCS must be opened, such that safety related decay heat removal can be immediately initiated by actuation of the IRWST injection valve(s).
SURVEILLANCE REQUIREMENTS	SR 3.5.5.1 The LCO 3.5.4 Surveillance Requirements are applicable to the PRHR HX required to be OPERABLE. The Frequencies associated with each specified SR are applicable. Refer to the corresponding Bases for LCO 3.5.4 for a discussion of each SR.
REFERENCES	None.

B 3.5 PASSIVE CORE COOLING SYSTEM (PXS)

B 3.5.6 In-containment Refueling Water Storage Tank (IRWST) - Operating

BASES

BACKGROUND

The IRWST is a large stainless steel lined tank filled with borated water (Ref. 1). It is located below the operating deck in containment. The tank is designed to meet seismic Category 1 requirements. The floor of the IRWST is elevated above the reactor coolant loop so that borated water can drain by gravity into the Reactor Coolant System (RCS). The IRWST is maintained at ambient containment pressure.

The IRWST has two injection flow paths. The injection paths are connected to the reactor vessel through two direct vessel injection lines which are also used by the accumulators and the core makeup tanks. Each path includes an injection flow path and a containment recirculation flow path. Each injection path includes a normally open motor operated isolation valve and two parallel lines each isolated by one check valve and one squib valve in series.

The IRWST has two containment recirculation flow paths. Each containment recirculation path contains two parallel flow paths, one path is isolated by a motor operated valve in series with a squib valve and one path is isolated by a check valve in series with a squib valve.

During refueling operations, the IRWST is used to flood the refueling cavity. During abnormal events, the IRWST serves as a heat sink for the passive residual heat removal heat exchangers, as a heat sink for the depressurization spargers, and as a source of low head (ambient containment pressure) safety injection during loss of coolant accidents (LOCAs) and loss of decay heat removal in MODE 5 (loops not filled). The IRWST can be cooled by the Normal Residual Heat Removal System (RNS) system.

The IRWST size and injection capability is selected to provide adequate core cooling for the limiting Design Basis Accidents (DBAs) (Ref. 2).

(continued)

BASES (continued)

APPLICABLE SAFETY ANALYSES

During non-LOCA events, the IRWST serves as the initial heat sink for the PRHR Heat Exchanger (PRHR HX) if used during reactor cooldown to MODE 4. If RNS is available, it will be actuated in MODE 4 and used to continue the plant cooldown to MODE 5. If RNS is not available, cooldown can continue on PRHR. Continued PRHR HX operation will result in the water in the IRWST heating up to saturation conditions and boiling. The steam generated in the IRWST enters the containment through the IRWST vents. Most of the steam generated in the IRWST condenses on the inside of the containment vessel and drains back to the IRWST.

For events which involve a loss of primary coolant inventory, such as a large break LOCA, or other events involving automatic depressurization, the IRWST provides low pressure safety injection (Ref. 2). The IRWST drain down time is dependent on several factors, including break size, location, and the return of steam condensate from the passive containment cooling system. During drain down, when the water in the IRWST reaches the Low 5 level, the containment sump will be sufficiently flooded, to initiate containment sump recirculation. This permits continued cooling of the core by recirculation of the spilled water in the containment sumps via the sump recirculation flow paths. In this situation, core cooling can continue indefinitely.

When the plant is in midloop operation, the pressurizer Automatic Depressurization System (ADS) valves are open, and the RNS is used to cool the RCS. The RNS is not a safety related system, so its failure must be considered. In this situation, with the RCS drained and the pressure boundary open, the PRHR HX cannot be used. In such a case, core cooling is provided by gravity injection from the IRWST, venting the RCS through the ADS. Injection from the IRWST provides core cooling until the tank empties and gravity recirculation from the containment starts. With the containment closed, the recirculation can continue indefinitely, with the decay heat generated steam condensing on the containment vessel and draining back into the IRWST.

The IRWST satisfies Criteria 2 and 3 of the NRC Policy Statement.

(continued)

BASES (continued)

LCO

The IRWST requirements ensure that an adequate supply of borated water is available to act as a heat sink for PRHR and to supply the required volume of borated water as safety injection for core cooling and reactivity control.

To be considered OPERABLE, the IRWST must meet the water volume, boron concentration, and temperature limits defined in the surveillance requirements. The motor operated injection isolation valves must be open with power removed, and the motor operated sump recirculation isolation valves must be closed and OPERABLE.

APPLICABILITY

In MODES 1, 2, 3, and 4, a safety related function of the IRWST is to provide a heat sink for PRHR. In MODES 1, 2, 3, 4, and 5, a second safety related function is the low head safety injection of borated water following a LOCA for core cooling and reactivity control. Both of these functions must be available to meet the initial assumptions of the safety analyses. These assumptions require the specified boron concentration, the minimum water volume, and the maximum water temperature.

The requirements for the IRWST in MODES 5 and 6 are specified in LCO 3.5.7, In-containment Refueling Water Storage Tank (IRWST) - Shutdown, RCS Inventory High and LCO 3.5.8, In-containment Refueling Water Storage Tank (IRWST) - Shutdown, RCS Inventory Low.

ACTIONS

A.1

If a motor operated containment sump isolation valve in one sump recirculation flow path is inoperable, the valve must be restored to OPERABLE status within 72 hours. In this condition, three other sump recirculation flow paths are available and can provide 100% of the required flow assuming a break in the direct vessel injection line associated with the other injection train, but with no single failure of the check valve flow path in the same sump recirculation flow path. The 72 hour Completion Time is consistent with times normally applied to degraded two train ECCS systems which can provide 100% of the required flow without a single failure.

(continued)

BASES

ACTIONS (continued)

B.1

With one motor operated containment sump isolation valve not fully closed, the valve must be closed within 72 hours. This valve is required to be closed to ensure that spurious actuation of the series isolation valve due to a single failure does not initiate premature discharge of the IRWST into the containment during a small break LOCA. The 72 hour Completion Time is acceptable considering that the accident mitigation function of the system is not degraded by this condition.

C.1

If the IRWST water volume, boron concentration, or temperature are not within limits, the core cooling capability from injection or PRHR HX heat transfer and the reactivity benefit of injection assumed in safety analyses may not be available. Due to the large volume of the IRWST, online monitoring of volume and temperature, and frequent surveillances, the deviation of these parameters is expected to be minor. The allowable deviation of the water volume is limited to 3%; this limit prevents a significant change in boron concentration and is consistent with long term cooling analysis performed to justify PRA success criteria (Ref. 3). The 8 hour Completion Time is acceptable, considering that the IRWST will be fully capable of performing its assumed safety function in response to DBAs with slight deviations in these parameters.

D.1

If the motor operated IRWST isolation valves are not fully open, injection flow from the IRWST may be less than assumed in the safety analysis. In this situation, the valves must be restored to fully open in 1 hour. This Completion Time is acceptable based on risk considerations.

E.1

If the IRWST cannot be returned to OPERABLE status within the associated Completion Times or the LCO is not met for reasons other than Conditions A, B, C or D, the plant must be brought to MODE 5 where the probability and consequences of a DBA are minimized. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are

(continued)

BASES

ACTIONS

E.1 (continued)

reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE REQUIREMENTS

SR 3.5.6.1

The IRWST borated water temperature must be verified every 24 hours to ensure that the temperature is within the limit assumed in the accident analysis. This Frequency is sufficient to identify a temperature change that would approach the limit and has been shown to be acceptable through operating experience.

SR 3.5.6.2

Verification every 24 hours that the IRWST borated water volume is above the required minimum level will ensure that a sufficient initial supply is available for safety injection and floodup volume for recirculation and as the heat sink for PRHR. During shutdown with the refueling cavity flooded with water from the IRWST, this Surveillance requires that the combined volume of borated water in the IRWST and refueling cavity meet the specified limit. Since the IRWST volume is normally stable, and is monitored by redundant main control indication and alarm, a 24 hour Frequency is appropriate.

SR 3.5.6.3

Verification every 31 days that the boron concentration of the IRWST is greater than the required limit, ensures that the reactor will remain subcritical following a LOCA. Since the IRWST volume is large and normally stable, the 31 day Frequency is acceptable, considering additional verifications are required within 6 hours after each solution volume increase of 15,000 gal., 3%. In addition, the relatively frequent surveillance of the IRWST water volume provides assurance that the IRWST boron concentration is not changed.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.5.6.4

This surveillance requires verification that each motor operated outlet isolation valve is fully open. This surveillance may be performed with available remote position indication instrumentation. The 12 hour Frequency is acceptable, considering the redundant remote indication and alarms and that power is removed form the valve operator.

SR 3.5.6.5

Verification is required to confirm that power is removed from each motor operated IRWST outlet isolation valve each 31 days. Removal of power from these valves reduces the likelihood that the valves will be inadvertently closed. The 31 day Frequency is acceptable considering frequent surveillance of valve position and that the valve has a confirmatory open signal.

SR 3.5.6.6

Verification is required to confirm that each motor operated containment recirculation isolation valve is closed every 31 days. This Surveillance may be performed with available remote position indication instrumentation. The 31 day Frequency is acceptable considering an open valve does not affect the ability of the flow path to provide recirculation flow, if required.

SR 3.5.6.7

Each motor operated containment recirculation isolation valve must be verified to be OPERABLE by stroking the valve open. The Surveillance Frequency references the Inservice Testing Program.

SR 3.5.6.8

This Surveillance requires verification that each IRWST injection and each containment recirculation squib valve is OPERABLE in accordance with the Inservice Testing Program. The Surveillance Frequency for verifying valve OPERABILITY references the Inservice Testing Program.

The squib valves will be tested in accordance with ASME Section XI which specifies valve testing in accordance with the ASME OM Code. The applicable ASME OM Code squib valve

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.5.6.8 (continued)

requirements are specified in paragraph 4.6, Inservice Tests for Category D Explosively Actuated Valves. The requirements include actuation of a sample of the installed valves each 2 years and periodic replacement of charges.

SR 3.5.6.9

Visual inspection is required each 24 months to verify that the IRWST screens and the containment recirculation screens are not restricted by debris. A Frequency of 24 months is adequate, since there are no known sources of debris with which the gutters could become restricted.

SR 3.5.6.10

This SR requires performance of a system inspection and performance test of the IRWST injection and recirculation flow paths to verify system flow capabilities. The system inspection and performance test demonstrates that the IRWST injection and recirculation capabilities assumed in accident analyses is maintained. Although the likelihood that system performance would degrade with time is low, it is considered prudent to periodically verify system performance. The System Level Operability Testing Program provides specific test requirements and acceptance criteria.

REFERENCES

1. Section 6.3, "Passive Core Cooling."
2. Section 15.6, "Decrease in Reactor Coolant Inventory."
3. AP600 PRA Thermal/Hydraulic Uncertainty Evaluation for Passive System Reliability, WCAP-14800, June 1997.

B 3.5 PASSIVE CORE COOLING SYSTEM (PXS)

B 3.5.7 In-containment Refueling Water Storage Tank (IRWST) – Shutdown, MODE 5

BASES

BACKGROUND	A description of the IRWST is provided in LCO 3.5.6, "In-containment Refueling Water Storage Tank – Operating."
APPLICABLE SAFETY ANALYSES	For postulated shutdown events in MODE 5 with the Reactor Coolant System (RCS) pressure boundary intact, the primary protection is Passive Residual Heat Removal (PRHR), where the IRWST serves as the initial heat sink for the PRHR heat exchanger (PRHR HX). For events in MODE 5 with the RCS pressure boundary open, PRHR is not available and RCS heat removal is provided by IRWST injection and containment sump recirculation. IRWST injection could be required to mitigate some events by providing RCS inventory makeup. No loss of coolant accidents (LOCAs) are postulated during plant operation in MODE 5; therefore, the rupture of the direct vessel injection line (DVI) is not assumed. Since the DVI rupture is not assumed, only one train of IRWST injection and recirculation flow paths is required to mitigation postulated events, assuming a single failure. The IRWST satisfies Criteria 2 and 3 of the NRC Policy Statement.
LCO	The IRWST requirements ensure that an adequate supply of borated water is available to act as a heat sink for PRHR and to supply the required volume of borated water as safety injection for core cooling and reactivity control. To be considered OPERABLE, the IRWST must meet the water volume, boron concentration, and temperature limits defined in the Surveillance Requirements, and one path of injection and recirculation must be OPERABLE (the motor operated injection isolation valve must be open with power removed, and the motor operated sump recirculation isolation valves must be closed and OPERABLE).

(continued)

BASES (continued)

APPLICABILITY

In MODE 5 with the RCS pressure boundary intact or with the RCS open with pressurizer level ≥ 20%, the IRWST is an RCS injection source of borated water for core cooling and reactivity control. Additionally, in MODE 5 with the RCS pressure boundary intact, the IRWST provides the heat sink for PRHR.

The requirements for the IRWST in MODES 1, 2, 3, and 4 are specified in LCO 3.5.6, In-containment Refueling Water Storage Tank (IRWST) – Operating. The requirements for the IRWST in MODES 5 and 6 with reduced RCS inventory are specified in LCO 3.5.8, In-containment Refueling Water Storage Tank (IRWST) – Shutdown, RCS Inventory Low.

ACTIONS

A.1

If a motor operated containment sump isolation valve in one sump recirculation flow path is inoperable, the valve(s) must be restored to OPERABLE status within 72 hours. The 72 hour Completion Time is consistent with times normally applied to degraded two train ECCS systems which can provide 100% of the required flow without a single failure.

B.1

With one motor operated containment sump isolation valve not fully closed, the valve must be closed within 72 hours. This valve is required to be closed to ensure that spurious actuation of the series isolation valve due to a single failure does not initiate premature discharge of the IRWST into the containment. The 72 hour Completion Time is acceptable considering that the accident mitigation function of the system is not degraded by this condition.

C.1

If the IRWST water volume, boron concentration, or temperature are not within limits, the core cooling capability from injection or PRHR heat transfer and the reactivity benefit of injection assumed in safety analyses may not be available. Due to the large volume of the IRWST, online monitoring of volume and temperature, and frequent surveillances, the deviation of these parameters is expected

(continued)

BASES

ACTIONS

C.1 (continued)

to be minor. The allowable water volume deviation is limited to 3% (refer to B 3.5.6, Action C.1). The 8 hour Completion Time is acceptable, considering that the IRWST will be fully capable of performing its assumed safety function in response to shutdown events with slight deviations in these parameters.

D.1

If the motor operated IRWST isolation valves are not fully open, injection flow from the IRWST may be less than assumed in the safety analysis. In this situation, the valves must be restored to fully open in 1 hour. This Completion Time is acceptable based on risk considerations.

E.1 and E.2

If the IRWST cannot be returned to OPERABLE status within the associated Completion Times or the LCO is not met for reasons other than Conditions A, B, C, or D, the plant must be placed in a condition in which the probability and consequences of an event are minimized to the extent possible. This is done by immediately initiating action to place the plant in MODE 5 with the RCS intact with ≥ 20% pressurizer level. The time to RCS boiling is maximized by maintaining RCS inventory at ≥ 20% pressurizer level and maintaining RCS temperature as low as practical. With the RCS intact, the availability of the PRHR HX is maintained. Additionally, action to suspend positive reactivity additions is required to ensure that the shutdown margin is maintained. Sources of positive reactivity addition include boron dilution, withdrawal of reactivity control assemblies, and excessive cooling of the RCS.

SURVEILLANCE REQUIREMENTS

SR 3.5.7.1

The LCO 3.5.6 Surveillance Requirements and Frequencies (SR 3.5.6.1 through 3.5.6.8) are applicable to the IRWST and the flow paths required to be OPERABLE. Refer to the corresponding Bases for LCO 3.5.6 for a discussion of each SR.

REFERENCES

None.

B 3.5 PASSIVE CORE COOLING SYSTEM (PXS)

B 3.5.8 In-containment Refueling Water Storage Tank (IRWST) – Shutdown, MODE 6

BASES

BACKGROUND	A description of the IRWST is provided in LCO 3.5.6, "In-containment Refueling Water Storage Tank (IRWST) – Operating."
APPLICABLE SAFETY ANALYSES	For MODE 6, heat removal is provided by IRWST injection and containment sump recirculation. IRWST injection could be required to mitigate some events by providing RCS inventory makeup. One line with redundant, parallel valves is required to accommodate a single failure (to open) of an isolation valve. The IRWST satisfies Criteria 2 and 3 of the NRC Policy Statement.
LCO	The IRWST requirements ensure that an adequate supply of borated water is available to supply the required volume of borated water as safety injection for core cooling and reactivity control. To be considered OPERABLE, the IRWST in combination with the refueling cavity must meet the water volume, boron concentration, and temperature limits defined in the Surveillance Requirements, and one path of injection and recirculation must be OPERABLE. The motor operated injection isolation valve must be open and power removed, and the motor operated sump recirculation isolation valves must be closed and OPERABLE. Any cavity leakage should be estimated and made up with borated water such that the volume in the IRWST plus the refueling cavity will meet the IRWST volume requirement.

(continued)

BASES (continued)

APPLICABILITY

In MODE 6, the IRWST is an RCS injection source of borated water for core cooling and reactivity control.

The requirements for the IRWST in MODES 1, 2, 3, and 4 are specified in LCO 3.5.6, In-containment Refueling Water Storage Tank (IRWST) - Operating. The requirements for the IRWST in MODES 5 with the RCS pressure boundary intact or with the RCS pressure boundary open with pressurizer level ≥ 20%, are specified in LCO 3.5.7, In-containment Refueling Water Storage Tank (IRWST) - Shutdown, RCS Inventory High.

ACTIONS

A.1

If one required motor operated containment sump isolation valve is inoperable, the valve must be restored to OPERABLE status within 72 hours. The 72 hour Completion Time is consistent with times normally applied to degraded two train ECCS systems which can provide 100% of the required flow without a single failure.

B.1

With one motor operated containment sump isolation valve not fully closed, the valve must be closed within 72 hours. This valve is required to be closed to ensure that spurious actuation does not initiate premature discharge of the IRWST into the containment. The 72 hour Completion Time is acceptable considering that the accident mitigation function of the system is not degraded by this condition.

C.1

If the IRWST and refueling cavity water volume, boron concentration, or temperature are not within limits, the core cooling capability from injection or PRHR HX heat transfer and the reactivity benefit of injection assumed in safety analyses may not be available. Due to the large volume of the IRWST, online monitoring of volume and temperature, and frequent surveillances, the deviation of these parameters is expected to be minor. The allowable water volume deviation is limited to 3% (refer to B 3.5.6, Action C.1). The 8 hour Completion Time is acceptable

(continued)

BASES

ACTIONS

C.1 (continued)

considering that the IRWST will be fully capable of performing its assumed safety function in response to shutdown events with slight deviations in these parameters.

D.1

If the motor operated IRWST isolation valves are not fully open, injection flow from the IRWST may be less than assumed in the safety analysis. In this situation, the valves must be restored to fully open in 1 hour. This Completion Time is acceptable based on risk considerations.

E.1 and E.2

If the IRWST cannot be returned to OPERABLE status within the associated Completion Times or the LCO is not met for reasons other than Conditions A, B, C, or D, the plant must be placed in a Condition in which the probability and consequences of an event are minimized to the extent possible. In MODE 6, action must be immediately initiated to be in MODE 6 with the cavity water level $\geq$ 23 feet above the top of the reactor vessel flange.

The time to RCS boiling is maximized by maximizing the RCS inventory and maintaining RCS temperature as low as practical. With the RCS intact, another means of removing decay heat is available (the PRHR HX). Additionally, action to suspend positive reactivity additions is required to ensure that the shutdown margin is maintained. Sources of positive reactivity addition include boron dilution, withdrawal of reactivity control assemblies, and excessive cooling of the RCS. These Actions place the plant in a condition which maximizes the time to IRWST injection, thus providing time for repairs or application of alternative cooling capabilities.

(continued)

BASES (continued)

SURVEILLANCE REQUIREMENTS

SR 3.5.8.1

The IRWST and refueling cavity borated water temperature must be verified every 24 hours to ensure that the temperature is within the limit assumed in accident analysis. This Frequency is sufficient to identify a temperature change that would approach the limit and has been shown to be acceptable through operating experience.

SR 3.5.8.2

Verification every 24 hours that the IRWST and refueling cavity borated water volume is above the required minimum level will ensure that a sufficient initial supply is available for safety injection and floodup volume for recirculation and as the heat sink for PRHR. During shutdown with the refueling cavity flooded with water from the IRWST, this Surveillance requires that the combined volume of borated water in the IRWST and refueling cavity meet the specified limit. Since the IRWST volume is normally stable, and is monitored by redundant main control indication and alarm, a 24 hour Frequency is appropriate.

SR 3.5.8.3

Verification every 31 days that the boron concentration of the IRWST and refueling cavity is greater than the required limit ensures that the reactor will remain subcritical following shutdown events. Since the IRWST volume is large and normally stable, the 31 day Frequency is acceptable, considering additional verifications are required within 6 hours after each solution volume increase of 15,000 gal., 3%.

SR 3.5.8.4

LCO 3.5.6 Surveillance Requirements and Frequencies SR 3.5.6.4 through 3.5.6.9 are applicable to the IRWST and the flow paths required to be OPERABLE. Refer to the corresponding Bases for LCO 3.5.6 for a discussion of each SR.

REFERENCES

None.

B 3.6 CONTAINMENT SYSTEMS

B 3.6.1 Containment

BASES

BACKGROUND

The containment is a free standing steel pressure vessel surrounded by a reinforced concrete shield building. The containment vessel, including all its penetrations, is a low-leakage steel vessel designed to contain radioactive material that may be released from the reactor core following a Design Basis Accident (DBA) such that offsite radiation exposures are maintained within limits. The containment and shield building provide shielding from the fission products that may be present in the containment atmosphere following accident conditions.

The containment vessel is a vertical cylindrical steel pressure vessel with elliptical upper and lower heads, completely enclosed by a seismic Category I reinforced concrete shield building. A 4.5 foot wide annular space exists between the walls and domes of the steel containment vessel and the concrete shield building to permit inservice inspection and air flow over the steel dome for containment cooling. The containment utilizes the outer concrete building for shielding and a missile barrier, and the inner steel containment for leak tightness and passive containment cooling.

Containment piping penetration assemblies provide for the passage of process, service and sampling pipelines into the containment vessel while maintaining containment integrity. The shield building provides biological shielding and environmental missile protection for the containment vessel and the Nuclear Steam Supply System.

The inner steel containment and its penetrations establish the leakage limiting boundary of the containment. Maintaining the containment OPERABLE limits the leakage of fission product radioactivity from the containment to the environment. SR 3.6.1.1 leakage rate Surveillance Requirements conform with 10 CFR 50, Appendix J (Ref. 1), as modified by approved exemptions.

(continued)

BASES

BACKGROUND (continued)

The isolation devices for the penetrations in the containment boundary are a part of the containment leak tight barrier. To maintain this leak tight barrier:

a. All penetrations required to be closed during accident conditions are either:

   1. capable of being closed by an OPERABLE automatic containment isolation system, or

   2. closed by manual valves, blind flanges, or de-activated automatic valves secured in their closed positions, except as provided in LCO 3.6.3, "Containment Isolation Valves";

b. Each air lock is OPERABLE, except as provided in LCO 3.6.2, "Containment Air Locks"; and

c. All equipment hatches are closed.

APPLICABLE SAFETY ANALYSES

The safety design basis for the containment is that the containment must withstand the pressures and temperatures of the limiting DBA without exceeding the design leakage rates.

The DBAs that result in a challenge to containment OPERABILITY from high pressures and temperatures are a loss of coolant accident (LOCA), a steam line break, and a rod ejection accident (REA) (Ref. 2). In addition, release of significant fission product radioactivity within containment can occur from a LOCA or REA. The DBA analyses assume that the containment is OPERABLE such that, for the DBAs involving release of fission product radioactivity, release to the environment is controlled by the rate of containment leakage. The containment is designed with an allowable leakage rate of 0.10% of containment air weight of the original content of containment air after a DBA per day (Ref. 3). This leakage rate, used in the evaluation of offsite doses resulting from accidents, is defined in 10 CFR 50, Appendix J (Ref. 1), as L_a: the maximum allowable containment leakage rate at the calculated peak containment internal pressure (P_a) resulting from the limiting DBA. The allowable leakage rate represented by L_a forms the basis for the acceptance criteria imposed on containment leakage rate testing. L_a is assumed to be 0.10% per day in the safety analysis.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)	Satisfactory leakage rate test results is a requirement for the establishment of containment OPERABILITY. The containment satisfies Criterion 3 of the NRC Policy Statement.
LCO	Containment OPERABILITY is maintained by limiting leakage to $\leq 1.0\ L_a$, except prior to the first startup after performing a required Containment Leakage Rate Testing Program Leakage Test. At this time, the applicable leakage limits must be met. Compliance with this LCO will ensure a containment configuration, including equipment hatches, that is structurally sound and that will limit leakage to those leakage rates assumed in the safety analysis. Individual leakage rates specified for the containment air lock (LCO 3.6.2) are not specifically part of the acceptance criteria of 10 CFR 50, Appendix J, Option B. Therefore, leakage rates exceeding these individual limits only result in the containment being inoperable when the leakage results in exceeding the overall acceptance criteria of $1.0\ L_a$.
APPLICABILITY	In MODES 1, 2, 3, and 4, a DBA could cause a release of radioactive material into containment. In MODES 5 and 6, the probability and consequences of these events are reduced due to the pressure and temperature limitations of these MODES. The MODES 5 and 6 requirements are specified in LCO 3.6.8, "Containment Penetrations".
ACTIONS	<u>A.1</u> In the event containment is inoperable, containment must be restored to OPERABLE status within 1 hour. The 1 hour Completion Time provides a period of time to correct the problem commensurate with the importance of maintaining

(continued)

BASES

ACTIONS

A.1 (continued)

containment OPERABLE during MODES 1, 2, 3, and 4. This time period also ensures that the probability of an accident (requiring containment OPERABILITY) occurring during periods when containment is inoperable is minimal.

B.1 and B.2

If containment cannot be restored to OPERABLE status within the required Completion Time, the plant must be brought to MODE 5 where the probability and consequences of an event are minimized. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE REQUIREMENTS

SR 3.6.1.1

Maintaining the containment OPERABLE requires compliance with the visual examinations and leakage rate test requirements of the Containment Leakage Rate Testing Program. Failure to meet air lock leakage limits specified in LCO 3.6.2 does not invalidate the acceptability of these overall leakage determinations. The impact of the failure to meet these SRs must be calculated against the Type A, B, and C acceptance criteria of the Containment Leakage Rate Testing Program. As left leakage prior to the first startup after performing a required leakage test is required to be $< 0.6\ L_a$ for combined Type B and C leakage, and $< 0.75\ L_a$ for overall Type A leakage. At all other times between required leakage rate tests, the acceptance criteria is based on an overall Type A leakage limit of $\leq 1.0\ L_a$. At $\leq 1.0\ L_a$ the offsite dose consequences are bounded by the assumptions of the safety analysis. SR Frequencies are as required by the Containment Leakage Rate Testing Program.

(continued)

BASES (continued)

REFERENCES

1. 10 CFR 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors."
2. Chapter 15, "Accident Analysis."
3. Section 6.2, "Containment Systems."

B 3.6 CONTAINMENT SYSTEMS

B 3.6.2 Containment Air Locks

BASES

BACKGROUND

Containment air locks form part of the containment pressure boundary and provide a means for personnel access during all MODES of operation.

Each air lock is nominally a right circular cylinder, 10 feet in diameter, with a door at each end. The doors are interlocked to prevent simultaneous opening. During periods when containment is not required to be OPERABLE, the door interlock mechanism may be disabled, allowing both doors of an air lock to remain open for extended periods when frequent containment entry is necessary. Each air lock door has been designed and tested to certify its ability to withstand a pressure in excess of the maximum expected pressure following a Design Basis Accident (DBA) in containment. As such, closure of a single door supports containment OPERABILITY. Each of the doors contains double gasketed seals and local leakage rate testing capability to ensure pressure integrity. To effect a leak tight seal, the air lock design uses pressure seated doors (i.e., an increase in containment internal pressure results in increased sealing force on each door).

The containment air locks form part of the containment pressure boundary. As such, air lock integrity and leak tightness are essential for maintaining the containment leakage rate within limit in the event of a DBA. Not maintaining air lock integrity or leak tightness may result in a leakage rate in excess of that assumed in the unit safety analyses.

APPLICABLE SAFETY ANALYSES

The DBA that results in the largest release of radioactive material within containment is a loss of coolant accident (LOCA) (Ref. 3). In the analyses of DBAs, it is assumed that containment is OPERABLE, such that release of fission products to the environment is controlled by the rate of containment leakage. The containment is designed with an allowable leakage rate of 0.10% of containment air weight of the original content of containment air per day after a DBA (Ref. 2). This leakage rate is defined in 10 CFR 50,

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)	Appendix J (Ref. 1), as L_a, the maximum allowable containment leakage rate at the calculated peak containment internal pressure P_a following a DBA. This allowable leakage rate forms the basis for the acceptance criteria imposed on the SRs associated with the air locks. The containment air locks satisfy Criterion 3 of the NRC Policy Statement.
LCO	Each containment air lock forms part of the containment pressure boundary. As part of containment, the air lock safety function is related to control of offsite radiation exposures resulting from a DBA. Thus, each air lock's structural integrity and leak tightness are essential to the successful mitigation of such an event. Each air lock is required to be OPERABLE. For the air lock to be considered OPERABLE, the air lock interlock mechanism must be OPERABLE, the air lock must be in compliance with the Type B air lock leakage test, and both air lock doors must be OPERABLE. The interlock allows only one air lock door of an air lock to be opened at one time. This provision ensures that a gross breach of containment does not exist when containment is required to be OPERABLE. Closure of a single door in each air lock is necessary to support containment OPERABILITY following postulated events. Nevertheless, both doors are kept closed when the air lock is not being used for normal entry and exit from containment.
APPLICABILITY	In MODES 1, 2, 3, and 4 a DBA could cause a release of radioactive material to containment. In MODES 5 and 6, the probability and consequences of these events are reduced due to the pressure and temperature limitations of these MODES and large inventory of coolant. Therefore, containment air locks are not required to be OPERABLE in MODES 5 and 6 to prevent leakage of radioactive material from containment. However, containment closure capability is required within MODES 5 and 6 as specified in LCO 3.6.8.

(continued)

BASES (continued)

ACTIONS

The ACTIONS are modified by a Note that allows entry and exit to perform repairs on the affected air lock component. If the outer door is inoperable, then it may be easily accessed to repair without interrupting containment integrity. If containment entry is required, it is preferred that the air lock be accessed from inside primary containment by entering through the other OPERABLE air lock. However, if this is not practicable, or if repairs on either door must be performed from the barrel side of the door then it is permissible to enter the air lock through the OPERABLE door, which means there is a short time during which the containment boundary is not intact (during access through the OPERABLE door). The ability to open the OPERABLE door, even if it means the containment boundary is temporarily not intact, is acceptable due to the low probability of an event that could pressurize the containment during the short time in which the OPERABLE door is expected to be open. After each entry and exit, the OPERABLE door must be immediately closed. If ALARA conditions permit, entry and exit should be via an OPERABLE air lock.

A second Note has been added to provide clarification that, for this LCO, separate Condition entry is allowed for each air lock. This is acceptable, since the Required Actions for each Condition provide appropriate compensatory actions for each inoperable air lock. Complying with the Required Actions may allow for continued operation, and a subsequent inoperable air lock is governed by subsequent Condition entry and application of associated Required Actions.

In the event that air lock leakage results in exceeding the overall containment leakage rate, Note 3 directs entry into the applicable Conditions and Required Actions of LCO 3.6.1, "Containment."

<u>A.1, A.2, and A.3</u>

With one air lock door in one or more containment air locks inoperable, the OPERABLE door must be verified closed (Required Action A.1) in each affected containment air lock. This ensures a leak tight containment barrier is maintained by the use of an OPERABLE air lock door. This action must be completed within 1 hour. This specified time period is consistent with the ACTIONS of LCO 3.6.1, "Containment," which requires containment be restored to OPERABLE status within 1 hour.

(continued)

BASES

ACTIONS

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

In addition, the affected air lock penetration must be isolated by locking closed the OPERABLE air lock door within the 24 hour Completion Time. The 24 hour Completion Time is reasonable for locking the OPERABLE air lock door, considering the OPERABLE door of the affected air lock is being maintained closed.

Required Action A.3 verifies that an air lock with an inoperable door has been isolated by the use of a locked and closed OPERABLE air lock door. This ensures that an acceptable containment leakage boundary is maintained. The Completion Time of once per 31 days is reasonable based on engineering judgement and is considered adequate in view of the low likelihood of a locked door being mispositioned and other administrative controls. Required Action A.3 is modified by a Note that applies to air lock doors located in high radiation areas and allows these doors to be verified to be locked closed by administrative means. Allowing verification by administrative means is considered acceptable, since access to these areas is typically restricted. Therefore, the probability of misalignment of the door, once it has been verified to be in the proper position, is small.

The Required Actions are modified by two Notes. Note 1 ensures that only the Required Actions and associated Completion Times of Condition C are required if both doors in the airlock are inoperable. With both doors in the same airlock inoperable, an OPERABLE door is not available to be closed. Required Actions C.1 and C.2 are the appropriate remedial actions. The exception of Note 1 does not affect tracking the Completion Time from the initial entry into Condition A; only the requirement to comply with the Required Actions. Note 2 allows use of an airlock for entry and exit for 7 days, under administrative controls if both airlocks have an inoperable door. This 7 day restriction begins when the second air lock is discovered inoperable. Containment entry may be required on a periodic basis to perform Technical Specification (TS) Surveillances and Required Actions, as well as other activities on equipment inside containment that are required by TS or activities on equipment that support TS-required equipment. This Note

(continued)

BASES

ACTIONS

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

is not intended to preclude performing other activities (non-TS-related activities) if the containment is entered, using the inoperable airlock, to perform an allowed activity listed above. This allowance is acceptable due to the low probability of an event that could pressurize the containment during the short time in which the OPERABLE door is expected to be open.

B.1, B.2, and B.3

With an air lock door interlock mechanism inoperable in one or more air locks, the Required Actions and associated Completion Times are consistent with Condition A.

The Required Actions have been modified by two Notes. Note 1 ensures that only the Required Actions and associated Completion Times of Condition C are required if both doors in the same airlock are inoperable. With both doors in the same airlock inoperable, an OPERABLE door is not available to be closed. Required Actions C.1 and C.2 are the appropriate remedial actions. Note 2 allows entry into and exit from containment under the control of a dedicated individual stationed at the airlock to ensure that only one door is opened at a time (the individual performs the function of the interlock).

Required Action B.3 is modified by a Note that applies to airlock doors located in high radiation areas that allows these doors to be verified locked closed by administrative means. Allowing verification by administrative means is considered acceptable since access to these areas is typically restricted. Therefore, the probability of misalignment of the door, once it has been verified to be in the proper position is small.

C.1, C.2, and C.3

With one or more air locks inoperable for reasons other than those described in Condition A or B, Required Action C.1 requires action to be initiated immediately to evaluate previous combined leakage rates using current air lock test results. An evaluation is acceptable, since it is overly conservative to immediately declare the containment inoperable if both doors in an air lock have failed a seal test or if the overall air lock leakage is not within

(continued)

BASES

ACTIONS

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

limits. In many instances (e.g., only one seal per door has failed), containment remains OPERABLE, yet only 1 hour (per LCO 3.6.1) would be provided to restore the air lock door to OPERABLE status prior to requiring a plant shutdown. In addition, even with both doors failing the seal test, the overall containment leakage rate can still be within limits.

Required Action C.2 requires that one door in the affected containment air lock must be verified to be closed within the 1 hour Completion Time. This specified time period is consistent with the ACTIONS of LCO 3.6.1, which requires that containment be restored to OPERABLE status within 1 hour.

Additionally, the affected air lock(s) must be restored to OPERABLE status within the 24 hour Completion Time. The specified time period is considered reasonable for restoring an inoperable air lock to OPERABLE status, assuming that at least one door is maintained closed in each affected air lock.

D.1 and D.2

If the inoperable containment air lock cannot be restored to OPERABLE status within the required Completion Time, the plant must be brought to MODE 5 where the probability and consequences of an event are minimized. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE REQUIREMENTS

SR 3.6.2.1

Maintaining containment air locks OPERABLE requires compliance with the leakage rate test requirements of the Containment Leakage Rate Testing Program. This SR reflects the leakage rate testing requirements with respect to air

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.6.2.1 (continued)

lock leakage (Type B leakage tests). The acceptance criteria were established during initial air lock and containment OPERABILITY testing. The periodic testing requirements verify that the air lock leakage does not exceed the allowed fraction of the overall containment leakage rate. The Frequency is as required by the Containment Leakage Rate Testing Program.

The SR has been modified by two Notes. Note 1 states that an inoperable air lock door does not invalidate the previous successful performance of the overall air lock leakage test. This is considered reasonable since either air lock door is capable of providing a fission product barrier in the event of a DBA. Note 2 has been added to this SR requiring the results to be evaluated against the acceptance criteria applicable to SR 3.6.1.1. This ensures that air lock leakage is properly accounted for in determining the combined Type B and C containment leakage rate.

SR 3.6.2.2

The air lock door interlock is designed to prevent simultaneous opening of both doors in a single air lock. Since both the inner and outer doors of an air lock are designed to withstand the maximum expected post accident containment pressure, closure of either door will support containment OPERABILITY. Thus, the door interlock feature supports containment OPERABILITY while the air lock is being used for personnel transit in and out of the containment. Periodic testing of this interlock demonstrates that the interlock will function as designed and that simultaneous inner and outer door opening will not inadvertently occur. Due to the purely mechanical nature of this interlock, and given that the interlock mechanism is only challenged when containment is entered, this test is only required to be performed upon entering or exiting a containment air lock but is not required more frequently than 184 days. The 184 day Frequency is based on engineering judgement and is considered adequate in view of other indications of door and interlock mechanism status available to operations personnel.

(continued)

BASES (continued)

REFERENCES

1. 10 CFR 50, Appendix J, Option B "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors, Performance-Based Requirements."
2. Section 6.2, "Containment Systems."
3. Chapter 15, "Accident Analysis."

B 3.6 CONTAINMENT SYSTEMS

B 3.6.3 Containment Isolation Valves

BASES

BACKGROUND

The containment isolation valves form part of the containment pressure boundary and provide a means for fluid penetrations not serving accident consequence limiting systems to be provided with two isolation barriers. These isolation devices are either passive or active (automatic). Manual valves, de-activated automatic valves secured in their closed position (including check valves with flow through the valve secured), blind flanges, and closed systems are considered passive devices. Check valves, or other automatic valves designed to close without operator action following an accident, are considered active devices. Two barriers in series are provided for each penetration so that no single credible failure or malfunction of an active component can result in a loss of isolation or leakage that exceeds limits assumed in the safety analyses. One of these barriers may be a closed system. These barriers (typically containment isolation valves) make up the Containment Isolation System.

Automatic isolation signals are produced during accident conditions. Section 6.2 (Ref. 1) identifies parameters which initiate isolation signal generation for containment isolation valves. The containment isolation valves (and blind flanges) help ensure that the containment atmosphere will be isolated from the environment in the event of a release of fission product radioactivity to the containment atmosphere as a result of a Design Basis Accident (DBA).

The OPERABILITY requirements for containment isolation valves help ensure that containment is isolated within the time limits assumed in the safety analysis. Therefore, the OPERABILITY requirements provide assurance that containment function assumed in the safety analysis will be maintained.

(continued)

BASES

BACKGROUND (continued)

Containment Air Filtration System [16-inch] purge valves

The Containment Air Filtration System operates to:

a. Supply outside air into the containment for ventilation and cooling or heating,

b. Reduce the concentration of noble gases within containment prior to and during personnel access, and

c. Equalize internal and external pressures.

Since the valves used in the Containment Air Filtration System are designed to meet the requirements for automatic containment isolation valves, these valves may be opened as needed in MODES 1, 2, 3 and 4.

APPLICABLE SAFETY ANALYSES

The containment isolation valve LCO was derived from the assumptions related to minimizing the loss of reactor coolant inventory and establishing the containment boundary during major accidents. As part of the containment boundary, containment isolation valve OPERABILITY supports leak tightness of the containment. Therefore, the safety analysis of any event requiring isolation of containment is applicable to this LCO.

The DBAs that result in a release of radioactive material within containment are a loss of coolant accident (LOCA) and a rod ejection accident (Ref. 2). In the analyses for each of the accidents, it is assumed that containment isolation valves are either closed or function to close within the required isolation time following event initiation. This ensures that potential paths to the environment through containment isolation valves (including containment purge valves) are minimized.

The DBA dose analysis assumes that, following containment isolation signal generation, the containment purge isolation valves are closed within 20 seconds. The remainder of the automatic isolation valves are assumed closed and the containment leakage is terminated except for the design leakage rate, L_a. Since the containment isolation valves

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)	are powered from the 1E division batteries no diesel generator startup time is applied. The single failure criterion required to be imposed in the conduct of plant safety analyses was considered in the design of the containment purge isolation valves. Two valves in series on each purge line provide assurance that both the supply and exhaust lines could be isolated even if a single failure occurred. The inboard and outboard isolation valves on each line are pneumatically operated, spring closed valves that fail in the closed position and are provided with power via independent sources. The containment isolation valves satisfy Criterion 3 of the NRC Policy Statement.
LCO	Containment isolation valves form a part of the containment boundary. The containment isolation valves' safety function is related to minimizing the loss of reactor coolant inventory and establishing the containment boundary during a DBA. The automatic power operated isolation valves are required to have isolation times within limits and to actuate on an automatic isolation signal. The valves covered by this LCO are listed along with their associated stroke times in the Section 6.2 (Ref. 1). The normally closed isolation valves are considered OPERABLE when manual valves are closed, automatic valves are de-activated and secured in their closed position, or blind flanges are in place and closed systems are intact. These passive isolation valves/devices are those listed in Reference 1. This LCO provides assurance that the containment isolation valves and purge valves will perform their designed safety functions to minimize the loss of reactor coolant inventory and establish the containment boundary during accidents.

(continued)

BASES (continued)

APPLICABILITY

In MODES 1, 2, 3, and 4 a DBA could cause a release of radioactive material to containment. In MODES 5 and 6, the probability and consequences of these events are reduced due to the pressure and temperature limitations of these MODES. Therefore, containment isolation valves are not required to be OPERABLE in MODES 5 and 6 to prevent leakage of radioactive material from containment. However, containment closure capability is required in MODES 5 and 6. The requirements for containment isolation valves during MODES 5 and 6 are addressed in LCO 3.6.8, "Containment Penetrations."

ACTIONS

The Actions are modified by a Note allowing containment penetration flow paths to be unisolated intermittently under administrative control. These administrative controls consist of stationing a dedicated operator at the valve controls, who is in continuous communication with the control room. In this way, the penetration can be rapidly isolated when a need for containment isolation is indicated.

A second Note has been added to provide clarification that, for this LCO, separate Condition entry is allowed for each penetration flow path. This is acceptable, since the Required Actions for each Condition provide appropriate compensatory actions for each inoperable containment isolation valve. Complying with the Required Actions may allow for continued operation, and subsequent inoperable containment isolation valves are governed by subsequent Condition entry and application of associated Required Actions.

The ACTIONS are further modified by a third Note, which ensures appropriate remedial actions are taken, if necessary, if the affected systems are rendered inoperable by an inoperable containment isolation valve.

In the event that the containment isolation valve leakage results in exceeding the overall containment leakage rate, Note 4 directs entry into the applicable Conditions and Required Actions of LCO 3.6.1.

(continued)

BASES

ACTIONS (continued)

A.1 and A.2

In the event one containment isolation valve in one or more penetration flow paths is inoperable the affected penetration flow path must be isolated. The method of isolation must include the use of at least one isolation barrier that cannot be adversely affected by a single active failure. Isolation barriers that meet this criterion are a closed and de-activated automatic containment isolation valve, a closed manual valve, a blind flange, or a check valve with flow through the valve secured. For a penetration flow path isolated in accordance with Required Action A.1, the device used to isolate the penetration should be the closest available one to containment. Required Action A.1 must be completed within 4 hours. The 4 hour Completion Time is reasonable considering the time required to isolate the penetration, the relative importance of supporting containment OPERABILITY during MODES 1, 2, 3, and 4, and the availability of a second barrier.

For affected penetrations that cannot be restored to OPERABLE status within the 4 hour Completion Time and have been isolated in accordance with Required Action A.1, the affected penetrations must be verified to be isolated on a periodic basis. This is necessary to ensure that containment penetrations that are required to be isolated following an accident and that are no longer capable of being automatically isolated, will be in the isolation position should an event occur. This Required Action does not require any testing or valve manipulation. Rather, it involves verification, through a system walkdown, that those isolation devices outside containment and capable of potentially being mispositioned are in the correct position. The Completion Time of "once per 31 days for isolation devices outside containment" is appropriate considering the fact that the devices are operated under administrative controls and the probability of their misalignment is low. For the isolation devices inside containment, the time period specified as "prior to entering MODE 4 from MODE 5, if not performed within the previous 92 days," is based on engineering judgment and is considered reasonable in view of the inaccessibility of the isolation devices and other administrative controls that will ensure that isolation device misalignment is an unlikely possibility.

(continued)

BASES

ACTIONS

A.1 and A.2 (continued)

Condition A has been modified by a Note indicating that this Condition is only applicable to those penetration flow paths with two containment isolation valves. For penetration flow paths with one containment isolation valve and a closed system, Condition C provides the appropriate actions.

Required Action A.2 is modified by a Note which applies to isolation devices located in high-radiation areas, and allows these devices to be verified closed by use of administrative means. Allowing verification by administrative means is considered acceptable, since access to these areas is typically restricted. Therefore, the probability of misalignment of these valves once they have been verified to be in the proper position, is small.

B.1

With two containment isolation valves in one or more penetration flow paths inoperable, the affected penetration flow path must be isolated within 1 hour. The method of isolation must include the use of at least one isolation barrier that cannot be adversely affected by a single active failure. Isolation barriers that meet this criterion are a closed and deactivated automatic valve, a closed manual valve and a blind flange. The 1 hour Completion Time is consistent with the ACTIONS of LCO 3.6.1. In the event the affected penetration is isolated in accordance with Required Action B.1, the affected penetration must be verified to be isolated on a periodic basis per Required Action A.2 which remains in effect. This periodic verification is necessary to ensure leak tightness of containment and that penetrations requiring isolation following an accident are isolated. The Completion Time of once per 31 days for verifying each affected penetration flow path is isolated is appropriate considering the fact that the valves are operated under administrative control and the probability of their misalignment is low.

Condition B is modified by a Note indicating this Condition is only applicable to penetration flow paths with two isolation valves. Condition A of this LCO addresses the condition of one containment isolation valve inoperable in this type of penetration flow path.

(continued)

BASES

ACTIONS (continued)

C.1 and C.2

With one or more penetration flow paths with one containment isolation valve inoperable, the inoperable valve flow path must be restored to OPERABLE status or the affected penetration must be isolated. The method of isolation must include the use of at least one isolation barrier that cannot be adversely affected by a single active failure. Isolation barriers that meet this criterion are a closed and deactivated automatic valve, a closed manual valve, and a blind flange. A check valve may not be used to isolate the affected penetration flow path. Required Action C.1 must be completed within the 4 hour Completion Time. The specified time period is reasonable considering the relative stability of the closed system (hence, reliability) to act as a penetration isolation boundary and the relative importance of maintaining containment integrity during MODES 1, 2, 3, and 4. In the event that the affected penetration is isolated in accordance with Required Action C.1, the affected penetration must be verified to be isolated on a periodic basis. This periodic verification is necessary to assure leak tightness of containment and that containment penetrations requiring isolation following an accident are isolated. The Completion Time of once per 31 days for verifying that each affected penetration flow path is isolated is appropriate because the valves are operated under administrative controls and the probability of their misalignment is low.

Condition C is modified by a Note indicating that this Condition is only applicable to penetration flow paths with only one containment isolation valve and a closed system. This Note is necessary since this Condition is written to specifically address those penetration flow paths in a closed system.

Required Action C.2 is modified by a Note which applies to valves and blind flanges located in high radiation areas, and allows these devices to be verified closed by use of administrative controls. Allowing verification by administrative controls is considered acceptable, since access to these areas is typically restricted. Therefore, the probability of misalignment of these valves, once they have been verified to be in the proper position, is small.

(continued)

BASES

ACTIONS (continued)

D.1 and D.2

If the Required Actions and associated Completion Times are not met, the plant must be brought to MODE 5 where the probability and consequences on an event are minimized. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE REQUIREMENTS

SR 3.6.3.1

This SR ensures that the [16 inch] purge valves are closed as required or, if open, open for an allowable reason. If a purge valve is open in violation of this SR, the valve is considered inoperable. If the inoperable valve is not otherwise known to have excessive leakage when closed, it is not considered to have leakage outside of limits. The SR is not required to be met when the [16 inch] purge valves are open for the reasons stated. The valves may be opened for pressure control, ALARA or air quality considerations for personnel entry, or for Surveillances that require the valves to be open. The [16 inch] purge valves are capable of closing in the environment following a LOCA. Therefore, these valves are allowed to be open for limited periods of time. The 31 day Frequency is consistent with other containment isolation valve requirements discussed in SR 3.6.3.2.

SR 3.6.3.2

This SR requires verification that each containment isolation manual valve and blind flange located outside containment and 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 containment boundary is within design limits. This SR does not require any testing or valve manipulation. Rather, it involves verification, through a system walkdown, that those valves outside containment and capable of being mispositioned are in the correct position. Since verification of valve position for valves outside

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.6.3.2 (continued)

containment is relatively easy, the 31 day Frequency was chosen to provide added assurance of the correct positions. The SR specifies that containment isolation valves that are open under administrative controls are not required to meet the SR during the time the valves are open.

The Note applies to valves and blind flanges located in high radiation areas and allows these devices to be verified closed by administrative means. Allowing verification by administrative means is considered acceptable, since access to these areas is typically restricted during MODES 1, 2, 3, and 4 for ALARA reasons. Therefore, the probability of misalignment of these containment isolation valves, once they have been verified to be in the proper position, is small.

SR 3.6.3.3

This SR requires verification that each containment isolation manual valve and blind flange located inside containment and 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 containment boundary is within design limits. For containment isolation valves inside containment, the Frequency specified as "prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days" is appropriate since these containment isolation valves are operated under administrative control and the probability of their misalignment is low. The SR specifies that containment isolation valves that are open under administrative controls are not required to meet the SR during the time they are open.

This Note allows valves and blind flanges located in high radiation areas to be verified closed 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, 3, and 4 for ALARA reasons. Therefore, the probability of misalignment of these containment isolation valves, once they have been verified to be in the proper position, is small.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.6.3.4

Verifying that the isolation time of each power operated and automatic containment isolation valve is within limits is required to demonstrate OPERABILITY. The isolation time test ensures that the valve will isolate in a time period less than or equal to that assumed in the safety analysis. The isolation times are specified in Section 6.2.3 (Ref. 1) and Frequency of this SR is in accordance with the Inservice Testing Program.

SR 3.6.3.5

Automatic containment isolation valves close on isolation signal to prevent leakage of radioactive material from containment following a DBA. This SR ensures that each automatic containment isolation valve will actuate to its isolation position on a containment isolation signal. This surveillance is not required for valves that are locked, sealed, or otherwise secured in the required position under administrative controls. The Frequency of this SR is in accordance with the Inservice Testing Program.

REFERENCES

1. Section 6.2, "Containment Systems."
2. Chapter 15, "Accident Analysis."
3. NUREG-1449, "Shutdown and Low Power Operation at Commercial Nuclear Power Plants in the United States."

B 3.6 CONTAINMENT SYSTEMS

B 3.6.4 Containment Pressure

BASES

BACKGROUND

The containment pressure is limited during normal operation to preserve the initial conditions assumed in the accident analyses for a loss of coolant accident (LOCA) or steam line break (SLB). These limits also prevent the containment pressure from exceeding the containment design negative pressure differential with respect to the outside atmosphere in the event of transients which result in a negative pressure.

Containment pressure is a process variable that is monitored and controlled. The containment pressure limits are derived from the operating band of conditions used in the containment pressure analyses for the Design Basis Events which result in internal or external pressure loads on the containment vessel. Should operation occur outside these limits, the initial containment pressure would be outside the range used for containment pressure analyses.

APPLICABLE SAFETY ANALYSES

Containment internal pressure is an initial condition used in the DBA analyses to establish the maximum peak containment internal pressure. The limiting DBAs considered, relative to containment pressure, are the LOCA and SLB, which are analyzed using computer pressure transients. The worst case SLB generates larger mass and energy release than the worst case LOCA. Thus, the SLB event bounds the LOCA event from the containment peak pressure standpoint (Ref. 1).

The initial pressure containment used in the containment analysis was 15.7 psia (1.0 psig). This resulted in a maximum peak pressure from an SLB of [44.1] psig as indicated in reference 1. The containment analysis (Ref. 1) shows that the maximum peak calculated containment pressure, P_a, results from the limiting SLB. The maximum containment pressure resulting from the worst case SLB does not exceed the containment design pressure, 45 psig.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

The containment was also designed for an external pressure load equivalent to 3.0 psig. The limiting negative pressure transient is a loss of all AC power sources coincident with extreme cold weather conditions which cool the external surface of the containment vessel. The initial pressure condition used in this analysis was -0.2 psig. This resulted in a minimum pressure inside containment, as illustrated in reference 1, which is less than the design load. Other external pressure load events evaluated include:

Failed fan cooler control
Malfunction of containment purge system
Inadvertent Incontainment Refueling Water Storage Tank (IRWST) drain
Inadvertent Passive Containment Cooling System (PCS) actuation

Since the containment external pressure deign limits can be met by ensuring compliance with the initial pressure condition, NUREG-1431 LCO 3.6.12, Vacuum Relief System is not applicable to the AP600 containment.

Containment pressure satisfies Criterion 2 of the NRC Policy Statement.

LCO

Maintaining containment pressure at less than or equal to the LCO upper pressure limit ensures that, in the event of a DBA, the resultant peak containment accident pressure will remain below the containment design pressure. Maintaining containment pressure at greater than or equal to the LCO lower pressure limit ensures that the containment will not exceed the design negative differential pressure following negative pressure transients.

APPLICABILITY

In MODES 1, 2, 3, and 4, a DBA could cause a release of radioactive material to containment. Since maintaining containment pressure within limits is essential to ensure initial conditions assumed in the accident analyses are maintained, the LCO is applicable in MODES 1, 2, 3, and 4.

(continued)

BASES

APPLICABILITY (continued)	In MODES 5 and 6, the probability and consequences of these events are reduced due to the pressure and temperature limitations of these MODES. Therefore, maintaining containment pressure within the limits of the LCO is not required in MODE 5 or 6.
ACTIONS	A.1 When containment pressure is not within the limits of the LCO, it must be restored within 1 hour. The Required Action is necessary to return operation to within the bounds of the containment analysis. The 1 hour Completion Time is based on the time required to restore the containment to within limits, the conservative assumption of the containment analysis and minor pressure deviations expected during normal operation. B.1 and B.2 If containment pressure cannot be restored to within limits within the required Completion Time, the plant must be brought to MODE 5 where the probability and consequences on an event are minimized. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.
SURVEILLANCE REQUIREMENTS	SR 3.6.4.1 Verifying that containment pressure is within limits ensures that unit operation remains within the limits assumed in the containment analysis. The 12 hour Frequency of this SR was developed based on operating experience related to trending of both containment pressure variations during the applicable MODES. Furthermore, the 12 hour Frequency is considered adequate in view of other indications available in the main control room, including alarms, to alert the operator to an abnormal containment pressure condition.
REFERENCES	1. Section 6.2, "Containment Analysis."

B 3.6 CONTAINMENT SYSTEMS

B 3.6.5 Containment Air Temperature

BASES

BACKGROUND

The containment structure serves to contain radioactive material that may be released from the reactor core following a Design Basis Accident (DBA). The containment average air temperature is limited during normal operation to preserve the initial conditions assumed in the accident analyses for a loss of coolant accident (LOCA) or steam line break (SLB).

The containment average air temperature limit is derived from the input conditions used in the containment functional analyses and the containment structure external pressure analyses. This LCO ensures that initial conditions assumed in the analysis of containment response to a DBA are not violated during plant operations. The total amount of energy to be removed from containment by the passive containment cooling system during post accident conditions is dependent upon the energy released to the containment due to the event, as well as the initial containment temperature and pressure. The higher the initial temperature, the more energy that must be removed, resulting in higher peak containment pressure and temperature. Exceeding containment design pressure may result in leakage greater than that assumed in the accident analysis. Operation with containment temperature in excess of the LCO limit violates an initial condition assumed in the accident analysis.

APPLICABLE SAFETY ANALYSES

Containment average air temperature is an initial condition used in the DBA analyses that establishes the containment environmental qualification operating envelope for both pressure and temperature. The limit for containment average air temperature ensures that operation is maintained within the assumptions used in the DBA analyses for containment (Ref. 1).

The limiting DBAs considered relative to containment OPERABILITY are the LOCA and SLB. The DBA LOCA and SLB are analyzed using computer codes designed to predict the resultant containment pressure transients. No two DBAs are assumed to occur simultaneously or consecutively. The

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

postulated DBAs are analyzed with regard to containment Engineered Safety Feature (ESF) systems, assuming the loss of one Class 1E Engineered Safety Features Actuation Cabinet (ESFAC) Division, which is the worst case single active failure, resulting in one Passive Containment Cooling System flow path being rendered inoperable.

The limiting DBA for the maximum peak containment air temperature is a LOCA. The initial containment average air temperature assumed in the design basis analyses (Ref. 1) is 120°F. This resulted in a maximum containment air temperature of [391.1]°F.

The DBA temperature transients are used to establish the environmental qualification operating envelope for containment. The basis of the containment environmental qualification temperature envelope is to ensure the performance of safety related equipment inside containment (Ref. 2). The containment vessel design temperature is 280°F. The containment vessel temperature remains below 280°F for DBAs. Therefore, it is concluded that the calculated transient containment air temperature is acceptable for the DBAs.

The temperature limit is also used in the depressurization analyses to ensure that the minimum pressure limit is maintained following an inadvertent actuation of the Passive Containment Cooling System (Ref. 1).

The containment pressure transient is sensitive to the initial air mass in containment and, therefore, to the initial containment air temperature. The limiting DBA for establishing the maximum peak containment internal pressure is a SLB. The temperature limit is used in this analysis to ensure that in the event of an accident the maximum containment internal pressure will not be exceeded.

Containment average air temperature satisfies Criterion 2 of the NRC Policy Statement.

The containment pressure transient is sensitive to the initial containment air temperature. The temperature limit is used in this analysis to ensure that in the event of an accident the maximum containment internal pressure will not be exceeded.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)	Containment average air temperature satisfies Criterion 2 of the NRC Policy Statement.
LCO	During a DBA, with an initial containment average air temperature less than or equal to the LCO temperature limit, the resultant peak accident temperature is computed to remain within acceptable limits. As a result, the ability of containment to perform its design function is ensured.
APPLICABILITY	In MODES 1, 2, 3, and 4, a DBA could cause a release of radioactive material to containment. In MODES 5 and 6, the probability and consequences of these events are reduced due to the pressure and temperature limitations of these MODES. Therefore, maintaining containment average air temperature within the limit is not required in MODE 5 or 6.
ACTIONS	<u>A.1</u> When containment average air temperature is not within the limit of the LCO, it must be restored to within its limit within 8 hours. This Required Action is necessary to return operation to within the bounds of the containment analysis. The 8 hour Completion Time is acceptable considering the sensitivity of the conservative analysis to variations in this parameter, and provides sufficient time to correct minor problems. <u>B.1 and B.2</u> If the containment average air temperature cannot be restored to within its limit within the required Completion Time, the plant must be brought to MODE 5 where the probability and consequences on an event are minimized. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

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BASES (continued)

SURVEILLANCE REQUIREMENTS

SR 3.6.5.1

Verifying that the containment average air temperature is within the LCO limit ensures that containment operation remains within the limits assumed for the containment analyses. In order to determine the containment average air temperature, a weighted average is calculated using measurements taken at locations within the containment selected to provide a representative sample of the associated containment atmosphere. The 24 hour Frequency of this Surveillance Requirement is considered acceptable based on observed slow rates of temperature increase within containment as a result of environmental heat sources (due to the large volume of containment). Furthermore, the 24 hour Frequency is considered adequate in view of other indications available in the main control room, including alarms, to alert the operator to an abnormal containment temperature condition.

REFERENCES

1. Section 6.2, "Containment Systems."

2. 10 CFR 50.49, "Environmental Qualification of Electric Equipment Important to Safety for Nuclear Power Plants."

B 3.6 CONTAINMENT SYSTEMS

B 3.6.6 Passive Containment Cooling System (PCS) – Operating

BASES

BACKGROUND

The PCS provides containment cooling to limit post accident pressure and temperature in containment to less than the design values. Reduction of containment pressure reduces the release of fission product radioactivity from containment to the environment, in the event of a Design Basis Accident (DBA). The Passive Containment Cooling System is designed to meet the requirements of 10 CFR 50 Appendix A GDC 38 "Containment Heat Removal" and GDC 40 "Testing of Containment Heat Removal Systems" (Ref. 1).

The PCS consists of a 531,000 gal cooling water tank, four headered tank discharge lines with flow restricting orifices, and two separate full capacity discharge flow paths to the containment vessel with isolation valves, each capable of meeting the design bases. Algae growth is not expected within the PCCWST; however, to assure water clarity is maintained, a prevailing concentration of hydrogen peroxide is maintained at 50 ppm. The recirculation pumps and heater provide freeze protection for the passive containment cooling water storage tank. However, OPERABILITY of the tank is assured by compliance with the temperature limits specified in SR 3.6.6.2 and not by the recirculation pumps and heater. In addition to the recirculation pumps and heater, the PCS water storage tank temperature can be maintained within limits by the ambient temperature, the large thermal inertia of the tank, or heat from other sources. The PCS valve room temperature must not be below freezing for an extended period to assure the water flow path to the containment shell is available. The isolation valves on each flow path are powered from a separate Division.

Upon actuation of the isolation valves, gravity flow of water from the cooling water tank (contained in the shield building structure above the containment) onto the upper portion of the containment shell reduces the containment pressure and temperature following a DBA. The flow of water to the containment shell surface is initially established to assure that the required short term containment cooling requirements following the postulated worst case LOCA are achieved. As the decay heat from the core becomes less with

(continued)

BASES

BACKGROUND (continued)

time, the water flow to the containment shell is reduced in two steps. The change in flow rate is attained without active components in the system and is dependent only on the decreasing water level in the elevated storage tank. In order to ensure the containment surface is adequately and effectively wetted, the water is introduced at the center of the containment dome and flows outward. Weirs are placed on the dome surface to distribute the water and ensure effective wetting of the dome and vertical sides of the containment shell. The monitoring of the containment surface through the Reliability Assurance Program (RAP) and the Inservice Testing Program assures containment surface does not unacceptably degrade containment heat removal performance. During the initial test program, the containment coverage will be measured at the base of the upper annulus in addition to the coverage at the spring line for the full flow case and a lower flow case with PCS recirculation pumps delivering to the containment shell. These benchmark values at the base of the upper annulus will be used to develop acceptance criteria for technical specifications. Contamination can be removed by PCS actuation or by using coating vendor cleaning procedures.

The path for the natural circulation of air is from the air intakes in the shield building, down the outside of the baffle, up along the containment shell to the top, center exit in the shield building and is always open. The drains in the upper annulus region must be clear to prevent water from blocking the air flow path. Heat is removed from within the containment utilizing the steel containment shell as the heat transfer surface combining conductive heat transfer to the water film, convective heat transfer from the water film to the air, radiative heat transfer from the film to the air baffle, and mass transfer (evaporation) of the water film into the air. As the air heats up and water evaporates into the air, it becomes less dense than the cooler air in the air inlet annulus. This differential causes an increase in the natural circulation of the air upward along the containment surface, with heated air/water vapor exiting the top/center of the shield building. Additional system design details are provided in reference 3.

The PCS is actuated either automatically, by a containment High-2 pressure signal, or manually. Automatic actuation opens the cooling water tank discharge valves, allowing gravity flow of the cooling water onto the containment shell. The manual containment cooling actuation consists of

(continued)

BASES

BACKGROUND (continued)	four momentary controls, if two associated controls are operated simultaneously actuation will occur in all divisions. The discharge continues for at least three days. The PCS is designed to limit post-accident pressure and temperature in containment to less than the design values. Reduction of containment pressure reduces the release of fission product radioactivity from containment to the environment, in the event of a DBA. The PCS is an ESF system and is designed to ensure that the heat removal capability required during the post accident period can be attained.
APPLICABLE SAFETY ANALYSES	The Passive Containment Cooling System limits the temperature and pressure that could be experienced following a DBA. the limiting DBAs considered are the loss of coolant accident (LOCA) and the steam line break (SLB). The LOCA and SLB are analyzed using computer codes designed to predict the resultant containment pressure and temperature transients. No DBAs are assumed to occur simultaneously or consecutively. The postulated DBAs are analyzed with regard to containment ESF system, assuming the loss of one Class 1E Engineered Safety Features Actuation Cabinet (ESFAC) Division, which is the worst case single active failure and results in one PCS flow path being inoperable. The analysis and evaluation show that under the worst case scenario, the highest peak containment pressure is [44.1] psig (experienced during an SLB). The analysis shows that the peak containment temperature is [391.1]°F (experienced during a LOCA). Both results meet the intent of the design basis. (See the Bases for LCO 3.6.4, "Containment Pressure," and LCO 3.6.5 for a detailed discussion.) The analyses and evaluations assume a unit specific power level of 1933 MWt, one passive containment cooling train operating, and initial (pre-accident) containment conditions of 120°F and 1.0 psig. The analyses also assume a response time delayed initiation to provide conservative peak calculated containment pressure and temperature responses. For certain aspects of transient accident analyses, maximizing the calculated containment pressure is not conservative. In particular, the effectiveness of the Passive Core Cooling System during the core reflood phase of a LOCA analysis increases with increasing containment

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

backpressure. For these calculations, the containment backpressure is calculated in a manner designed to conservatively minimize, rather than maximize, the calculated transient containment pressures in accordance with 10 CFR 50, Appendix K (Ref. 2).

Containment cooling system performance for post accident conditions is given in Reference 3. The result of the analysis is that each train can provide 100% of the required peak cooling capacity during the post accident condition.

The modeled Passive Containment Cooling System actuation response time from the containment analysis is based upon a response time associated with exceeding the containment High-2 pressure setpoint to opening of isolation valves.

The Passive Containment Cooling System satisfies Criterion 3 of the NRC Policy Statement.

LCO

During a DBA, one passive containment cooling water flow path is required to maintain the containment peak pressure and temperature below the design limits (Ref. 3). To ensure that this requirement is met, two passive containment cooling water flow paths must be OPERABLE. Therefore, in the event of an accident, at least one flow path operates, assuming the worst case single active failure occurs.

The PCS includes a cooling water tank, valves, piping, instruments and controls to ensure an OPERABLE flow path capable of delivering water from the cooling water tank upon an actuation signal. An OPERABLE flow path consists of either the normally closed air operated valve capable of automatically opening or the air operated valve open and the motor operated valve closed and capable of automatically opening.

The PCS cooling water storage tank ensures that an adequate supply of water is available to cool and depressurize the containment in the event of a Design Basis Accident (DBA). To be considered OPERABLE, the PCS cooling water storage tank must meet the water volume and temperature limits established in the SRs. To be considered OPERABLE, the air flow path from the shield building annulus inlet to the exit must be unobstructed, with unobstructed upper annulus safety-related drains providing a path for containment cooling water runoff to preclude blockage of the air flow path.

(continued)

BASES (continued)

APPLICABILITY

In MODES 1, 2, 3, and 4, a DBA could cause a release of radioactive material to containment and an increase in containment pressure and temperature requiring the operation of the PCS.

During shutdown the PCS may be required to remove heat from containment. The requirements in MODES 5 and 6 are specified in LCO 3.6.7, Passive Containment Cooling System (PCS) – Shutdown.

ACTIONS

A.1

With one passive containment cooling water flow path inoperable, the affected flow path must be restored to OPERABLE status within 72 hours. In this degraded condition, the remaining flow path is capable of providing greater than 100% of the heat removal needs after an accident. The 72 hour Completion Time was chosen in light of the remaining heat removal capability and the low probability of DBA occurring during this period.

B.1

If the cooling water tank is inoperable, it must be restored to OPERABLE status within 8 hours. The tank may be declared inoperable due to low water level or temperature out of limits. The 8 hour Completion Time is reasonable based on the remaining heat removal capability of the system and the availability of cooling water from alternate sources.

C.1

If any of the Required Actions and associated Completion Times for Condition A or B are not met, or if the LCO is not met for reasons other than Condition A or B, the plant must be brought to MODE 5 where the probability and consequences on an event are minimized. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 5 within 84 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems. The extended interval to reach MODE 5 allows additional time and

(continued)

BASES

ACTIONS

C.1 (continued)

is reasonable when considering that the driving force for a release of radioactive material from the Reactor Coolant System is reduced in MODE 3.

SURVEILLANCE REQUIREMENTS

SR 3.6.6.1

This surveillance requires verification that the cooling water temperature is within the limits assumed in the accident analyses. The 24 hour Frequency is adequate to identify a temperature change that would approach the temperature limit and has been shown to be acceptable in similar applications.

The SR is modified by a Note that eliminates the requirement to perform this Surveillance when ambient air temperatures are within the operating limits of the PCS water storage tank. With ambient temperatures within the band, the PCS water storage tank temperature should not exceed the limits.

SR 3.6.6.2

Verification that the cooling water volume is above the required minimum ensures that a sufficient supply is available for containment cooling. Since the cooling water volume is normally stable and low level is indicated by a main control room alarm, a 7 day Frequency is appropriate and has been shown to be acceptable in similar applications.

SR 3.6.6.3

Verifying the correct alignment of power operated, and automatic valves, excluding check valves, in the Passive Containment Cooling System provides assurance that the proper flow paths exist for system operation. This SR does not apply to valves that are locked, sealed, or otherwise secured in position since these were verified to be in the correct positions prior to being secured. This SR does not require any testing or valve manipulation. Rather, it involves verification, through control room instrumentation or a system walkdown, that valves capable of potentially being mispositioned are in the correct position. The 31 day Frequency is appropriate because the valves are operated

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BASES

SURVEILLANCE REQUIREMENTS

SR 3.6.6.3 (continued)

under administrative control, and an improper valve position would only affect a single flow path. This Frequency has been shown to be acceptable through operating experience.

SR 3.6.6.4

This SR requires verification that each automatic isolation valve actuates to its correct position upon receipt of an actual or simulated actuation signal. This Surveillance is not required for valves that are locked, sealed, or otherwise secured in the required position under administrative controls. The 24 month Frequency is based on the need to perform these Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillances were performed with the reactor at power. The 24 month Frequency is also acceptable based on consideration of the design reliability (and confirmed by operating experience) of the equipment. Operating experience has shown that these components usually pass the Surveillances when performed at the 24 month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

SR 3.6.6.5

Periodic inspections of the PCS air flow path from the shield building annulus inlet to the exit ensure that it is unobstructed, the baffle plates are properly installed, and the upper annulus safety-related drains are unobstructed. Although there are no anticipated mechanisms which would cause air flow path or annulus drain obstruction and the effect of a missing air baffle section is small, it is considered prudent to verify this capability every 24 months. Additionally, the 24 month Frequency is based on the desire to perform this Surveillance under conditions that apply during a plant outage, on the need to have access to the locations, and because of the potential for an unplanned transient if the Surveillance were performed with the reactor at power. This Frequency has been found to be sufficient to detect abnormal degradation in similar situations.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)	SR 3.6.6.6 This SR requires performance of a Passive Containment Cooling System test to verify system flow and water coverage capabilities. The system performance test demonstrates that the containment cooling capability assumed in accident analyses is maintained by verifying the flow rates via each standpipe and measurement of containment wetting coverage. The System Level Operability Testing Program provides specific test requirements and acceptance criteria. Although the likelihood that system performance would degrade with time is low, it is considered prudent to periodically verify system performance. The first refueling and 10 year Frequency is based on the ability of the more frequent surveillances to verify the OPERABILITY of the active components and features which could degrade with time.
REFERENCES	1. 10 CFR 50, Appendix A, "General Design Criteria for Nuclear Power Plants." 2. 10 CFR 50, Appendix K, "ECCS Evaluation Models." 3. Chapter 6.2, "Containment Systems."

B 3.6 CONTAINMENT SYSTEMS

B 3.6.7 Passive Containment Cooling System (PCS) – Shutdown

BASES

BACKGROUND	A description of the PCS is provided in the Bases for LCO 3.6.6, "Passive Containment Cooling System – Operating."
APPLICABLE SAFETY ANALYSES	The PCS limits the temperature and pressure that could be experienced during shutdown following a loss of decay heat removal. For shutdown events, the Reactor Coolant System (RCS) sensible and decay heat removal requirements are reduced as compared to heat removal requirements for MODE 1, 2, 3, or 4 events. Therefore, the shutdown containment heat removal requirements are bounded by analyses of MODES 1, 2, 3, and 4 events. A discussion of MODES 1, 2, 3, and 4 DBAs is provided in the Bases for LCO 3.6.6, "Passive Containment Cooling System (PCS) – Operating." The PCS satisfies Criterion 3 of the NRC Policy Statement.
LCO	For postulated shutdown events, one passive containment cooling water flow path is required to provide the required containment heat removal capability (Ref. 1). To ensure that this requirement is met, two passive containment cooling water flow paths must be OPERABLE. Therefore, in the event of an accident, at least one flow path operates, assuming the worst case single active failure occurs. The PCS includes a cooling water tank, valves, piping, instruments and controls to ensure an OPERABLE flow path capable of delivering water from the cooling water tank upon an actuation signal. The PCS cooling water storage tank ensures that an adequate supply of water is available to cool and depressurize the containment in the event of a loss of decay heat removal. To be considered OPERABLE, the PCS cooling water storage tank must meet the water volume and temperature limits established in the SRs. To be considered OPERABLE, the air

(continued)

BASES

LCO (continued)	flow path from the shield building annulus inlet to the exit must be unobstructed, with unobstructed upper annulus safety-related drains providing a path for containment cooling water runoff to preclude blockage of the air flow path.
APPLICABILITY	OPERABILITY of the PCS is required in either MODE 5 or 6 with the calculated reactor decay heat greater than 6 MWt for heat removal in the event of a loss of nonsafety decay heat removal capabilities. With the decay heat less than 6 MWt, the decay heat can be easily removed from containment with air cooling alone. Confirmation of decay heat levels may be determined consistent with the assumptions and analysis basis of ANS 1979 plus 2 sigma or via an energy balance of the reactor coolant system. The PCS requirements in MODES 1, 2, 3, and 4 are specified in LCO 3.6.6, Passive Containment Cooling System (PCS) – Operating.
ACTIONS	A.1 With one passive containment cooling water flow path inoperable, the affected flow path must be restored to OPERABLE status within 72 hours. In this degraded condition, the remaining flow path is capable of providing greater than 100% of the heat removal needs after an accident. The 72 hour Completion Time was chosen in light of the remaining heat removal capability and the low probability of an event occurring during this period. B.1 If the cooling water tank is inoperable, it must be restored to OPERABLE status within 8 hours. The tank may be declared inoperable due to low water volume or temperature out of limits. The 8 hour Completion Time is reasonable based on the remaining heat removal capability of the system and the availability of cooling water from alternate sources.

(continued)

BASES

ACTIONS (continued)

C.1

Action must be initiated if any of the Required Actions and associated Completion Times for Condition A or B are not met, or if the LCO is not met for reasons other than Condition A or B. If in MODE 5 with the RCS pressure boundary open and/or pressurizer level < 20%, action must be initiated, immediately, to increase the RCS level to a pressurizer level $\geq$ 20% and to close the RCS so that the PRHR HX operation is available. If in MODE 6, action must be initiated, immediately, to increase the refueling cavity water level $\geq$ 23 feet above the top of the reactor vessel flange. In both cases, the time to RCS boiling is maximized by maximizing the RCS inventory and maintaining RCS temperature as low as practical. Additionally, action to suspend positive reactivity additions is required to ensure that the shutdown margin is maintained. Sources of positive reactivity addition include boron dilution, withdrawal of reactivity control assemblies, and excessive cooling of the RCS.

These Actions place the plant in a condition which maximize the time to actuation of the Passive Containment Cooling System, thus providing time for repairs or application of alternative cooling capabilities.

SURVEILLANCE REQUIREMENTS

SR 3.6.7.1

The LCO 3.6.6 Surveillance Requirements (SR 3.6.6.1 through 3.6.6.6) are applicable. The Frequencies associated with each specified SR are applicable. Refer to the corresponding Bases for LCO 3.6.6 for a discussion of each SR.

REFERENCES

1. Section 6.2, "Containment Systems."

B 3.6 CONTAINMENT SYSTEMS

B 3.6.8 Containment Penetrations

BASES

BACKGROUND

Containment closure capability is required during shutdown operations when there is fuel inside containment. Containment closure is required to maintain within containment the cooling water inventory. Due to the large volume of the IRWST and the reduced sensible heat during shutdown, the loss of some of the water inventory can be accepted. Further, accident analyses have shown that containment closure capability is not required to meet offsite dose requirements. Therefore, containment does not need to be leak tight as required for MODES 1 through 4.

In MODES 5 and 6, the LCO requirements are referred to as "containment closure" rather than "containment OPERABILITY." Containment closure means that all potential escape paths are closed or capable of being closed. Since there is no requirement for containment leak tightness, compliance with the Appendix J leakage criteria and tests are not required.

In Modes 5 and 6, there is no potential for steam release into the containment immediately following a accident. Pressurization of the containment could only occur after heatup of the IRWST due to PRHR HX operation (MODE 5 with RCS intact) or after heatup of the RCS with direct venting to the containment (MODE 5 with reduced RCS inventory or MODE 6 with the refueling cavity not fully flooded) or after heatup of the RCS and refueling cavity (MODE 6 with refueling cavity fully flooded). The time from loss of normal cooling until steam release to the containment for four representative sets of plant conditions is shown in Figure B 3.6.8-1 as a function of time after shutdown. Because local manual action may be required to achieve containment closure it is assumed that the containment hatches, air locks and penetrations must be closed prior to steaming into containment.

Figure B 3.6.8-1 provides allowable closure times for four representative sets of plant conditions. The time to steaming is dependent on various plant parameters (RCS temperature, IRWST temperature, etc.) and plant configuration (RCS Pressure Boundary Intact, RCS Open, etc.). Therefore, the actual representation of the time to

(continued)

BASES

BACKGROUND (continued)

steaming may be different than that provided in Figure B 3.6.8-1. In determining the minimum time to steaming, conservative assumptions regarding core decay heat, RCS configuration, and initial RCS inventory are used to minimize the calculated time to steaming.

Per Reference 2, the most risk significant events during shutdown are events that lead to a loss of RNS cooling. Of these, the limiting events that lead to steaming to containment are the loss of shutdown cooling events that are presented in Reference 1. For such events, time to steaming is dependent on the postulated RCS configuration (intact versus open), and is based on the response of the plant considering features such as the operation of the 4th stage ADS valves if necessary, status of the upper internals, status of refueling cavity, etc. Conservative assumptions regarding these features are made in the determination of the minimum time to steaming. The risk of overdraining the RCS has been significantly reduced in the AP600 due to the automatic protection features associated with the hot leg level instruments which isolate letdown on low hot leg water level. For such events, a loss of RNS cooling does not occur.

The assumptions used in determining the required closure time for the various containment openings should be conservative, and should be consistent with the plant operating procedures, staffing levels, and status of the containment openings. The evaluation should consider the ability to close the containment for the limiting loss of shutdown cooling event, and considering the possibility of a station blackout.

The containment equipment hatches, which are part of the containment pressure boundary, provide a means for moving large equipment and components into and out of containment. If closed, the equipment hatch must be held in place by at least [four] bolts. Good engineering practice dictates that bolts required by this LCO be approximately equally spaced. Alternatively, if open, each equipment hatch can be installed using a dedicated set of hardware, tools and equipment. A self-contained power source is provided to drive each hoist while lowering the hatch into position. Large equipment and components may be moved through the hatches as long as they can be removed and the hatch closed prior to steaming into the containment.

(continued)

BASES

BACKGROUND (continued)

Reviewers Note: The design of the equipment hatch is such that the [four] bolts would only be needed to support the hatch in place and provide adequate strength to support the hatch dead weight and associated loads. The hatch is installed on the inside containment and is held in place against a matching flange surface with mating bolt pattern by the bolts. Once the dead weight is supported, any atmospheric pressure within containment will serve to exert closure force on the hatch toward the mating flange surface serving to reduce stresses on bolts. Therefore the determination of the number of bolts is limited to the quantity required to support the hatch itself and not related to any potential containment pressure.

The containment air locks, which are also part of the containment pressure boundary, provide a means for personnel access during MODES 1, 2, 3, and 4 unit operation in accordance with LCO 3.6.2, "Containment Air Locks." Each air lock has a door at both ends. The doors are normally interlocked to prevent simultaneous opening when containment OPERABILITY is required. During periods of unit shutdown when containment closure is required, the door interlock mechanism may be disabled, allowing both doors of an air lock to remain open for extended periods when frequent containment entry is necessary. Temporary equipment connections (e.g., power or communications cables) are permitted as long as they can be removed to allow containment closure prior to steaming into the containment.

Containment spare penetrations which also provide a part of the containment boundary provide for temporary support services (electrical, I&C, air, and water supplies) during MODES 5 and 6. Each penetration is flanged and normally closed. During periods of plant shutdown, temporary support systems may be routed through the penetrations; temporary equipment connections (e.g., power or communications cables) are permitted as long as they can be removed to allow containment closure prior to steaming into the containment. The spare penetrations must be closed or, if open, capable of closure prior to steaming to containment.

Containment penetrations, including purge system flow paths, that provide direct access from containment atmosphere to outside atmosphere must be isolated or capable of being isolated on at least one side. Isolation may be achieved by an OPERABLE automatic isolation valve, or by a manual

(continued)

BASES

BACKGROUND (continued)	isolation valve, blind flange, or equivalent. Equivalent isolation methods must be approved and may include use of a material that can provide a temporary barrier for the containment penetrations. The equivalent isolation barrier must be capable of maintaining containment isolation at the containment design pressure of 45 psig (Ref. 1).
APPLICABLE SAFETY ANALYSES	For postulated shutdown events in MODES 5 and 6, RCS heat removal is provided by either passive residual heat removal (PRHR) or IRWST injection and containment sump recirculation. To support RCS heat removal, containment closure is required to limit the loss of the cooling water inventory from containment (Ref. 1). Containment penetrations satisfy Criterion 3 of the NRC Interim Policy Statement.
LCO	This LCO limits the loss of cooling water inventory in containment to assure continued coolant inventory by limiting the potential escape paths for water released within containment. Penetrations closed in accordance with these requirements are not required to be leak tight. The LCO requires any penetration providing direct access from the containment atmosphere to the outside atmosphere to be closed or capable of being closed prior to steaming into the containment. The equipment hatches may be open; however, the hatches shall be clear of obstructions such that capability to close the hatch within the indicated time period is maintained. The hardware, tools, equipment and power sources necessary to install the hatches shall be available when the hatch is open. Both doors in each containment air lock may be open; however, the air locks shall be clear of obstructions such that the capability to close at least one door within the indicated time period is maintained. Alternatively, one door in an air lock may be closed. Containment spare penetrations may be open; however, the penetrations shall be capable of being closed within the indicated time period. Direct access penetrations shall be closed by at least one manual or automatic isolation valve, blind flange or equivalent, or capable of being closed by at least one valve actuated by a containment isolation signal. If direct access penetrations

(continued)

BASES

LCO (continued)

are open, OPERABILITY of the containment isolation instrumentation is required for the open penetrations by LCO 3.3.2, Function 3.a, Containment Isolation, Manual Initiation. An OPERABLE Containment Isolation Function includes LCO 3.3.2, Function 19.b, Containment Air Filtration System Isolation, Containment Isolation. Figure B 3.6.8-1 provides the acceptable required closure times for various representative modes and conditions.

APPLICABILITY

The containment penetration requirements are applicable during conditions for which the primary safety related core cooling and boration capabilities are provided by IRWST or injection or PRHR – MODES 5 and 6. The capability to close containment is required to ensure that the cooling water inventory is not lost in the event of an accident.

In MODES 1, 2, 3, and 4, containment penetration requirements are addressed by LCO 3.6.1.

ACTIONS

A.1

If the containment equipment hatches, air locks, or any containment penetration that provides direct access from the containment atmosphere to the outside atmosphere is not in the required status, including the containment isolation function not capable of actuation when automatic isolation valves are open, the penetration(s) must be restored to the required status within 1 hour.

B.1 and B.2

If Required Action A.1 is not completed within 1 hour or the LCO is not met for reasons other than Condition A, action must be taken to minimize the probability and consequences of an accident.

In MODE 5, action must be initiated, immediately, to be in MODE 5 with a pressurizer level ≥ 20% and to close the RCS so that the PRHR HX operation is available. In MODE 6, action must be initiated, immediately, to be in MODE 6 with the refueling cavity water level ≥ 23 feet above the top of the reactor vessel flange. The time to RCS steaming to containment is maximized by maximizing RCS inventory, and allowing PRHR HX operation. Additionally, action to suspend

(continued)

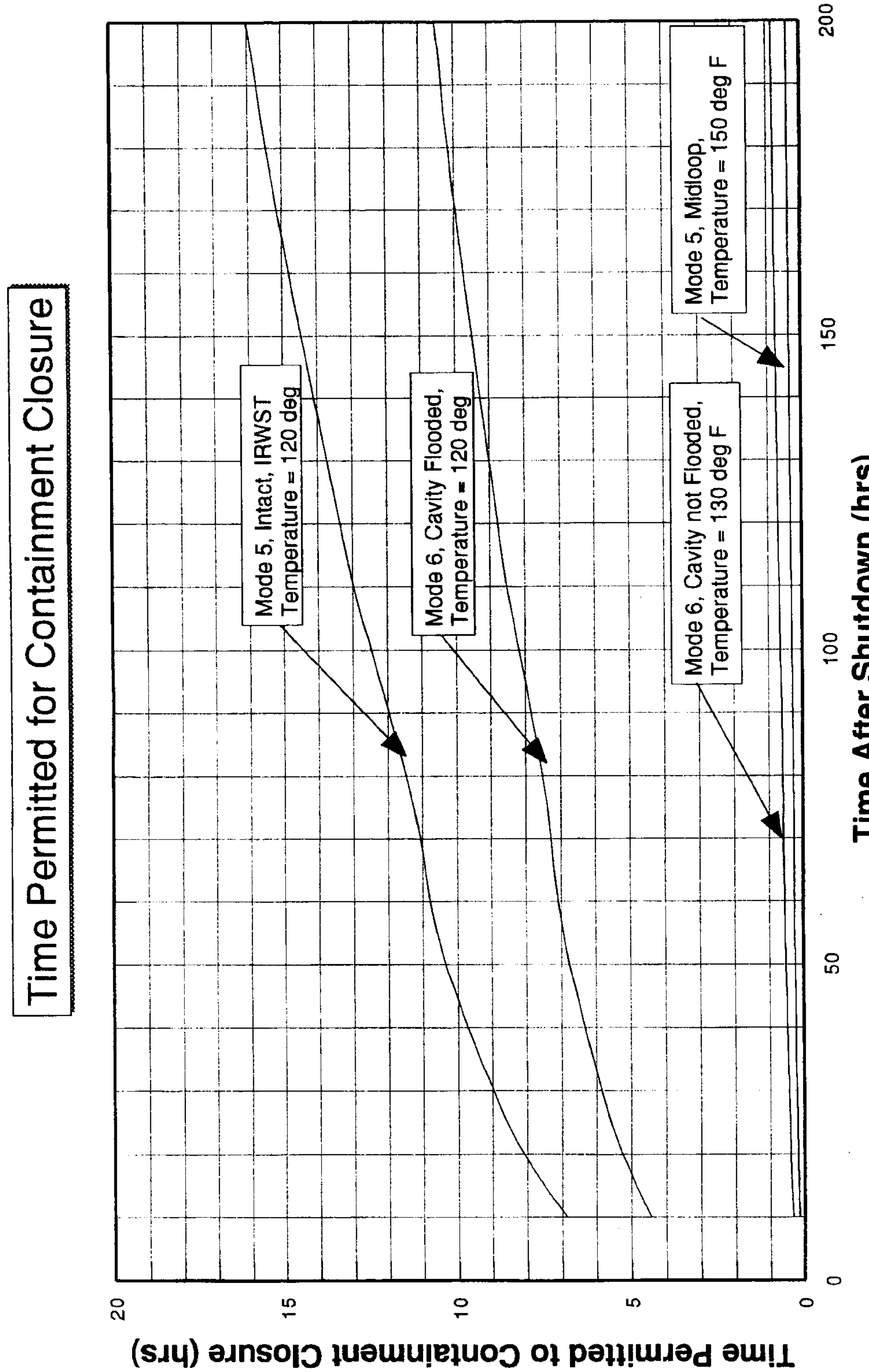

Figure B 3.6.8-1 (page 1 of 1)
Time Prior to Coolant Inventory Boiling

BASES

ACTIONS

B.1 and B.2 (continued)

positive reactivity additions is required to ensure that the shutdown margin is maintained. Sources of positive reactivity addition include boron dilution, withdrawal of reactivity control assemblies, and excessive cooling of the RCS.

SURVEILLANCE REQUIREMENTS

SR 3.6.8.1

This Surveillance demonstrates that each of the containment penetrations required to be in its closed position is in that position. The Surveillance on the open purge and exhaust valves will demonstrate that the valves are not blocked from closing. Also the Surveillance will demonstrate that each valve operator has motive power, which will ensure that each valve is capable of being closed by an OPERABLE automatic containment purge and exhaust isolation signal. Open containment spare penetrations shall be verified capable of being closed prior to steaming to containment by removal of obstructions and installation of the flange or by other closure means which will limit loss of the cooling water inventory from containment.

The Surveillance is performed every 7 days. The Surveillance interval is selected to ensure that the required penetration status is maintained during shutdown inspections, testing, and maintenance.

SR 3.6.8.2

Each of the two equipment hatches is provided with a set of hardware, tools, equipment, and self-contained power source for moving the hatch from its storage location and installing it in the opening. The required set of hardware and tools shall be visually inspected to ensure that they can perform the required functions. The equipment and power source shall be inspected and/or operated as necessary to verify that the hatch can be installed. The power source shall be verified as containing sufficient energy to install the hatch from the storage location.

The 7 day Frequency is adequate considering that the hardware, tools, equipment, and power sources are dedicated to the associated equipment hatch and not used for any other functions.

(continued)

BASES

SURVEILLANCE REQUIREMENTS	SR 3.6.8.2 (continued) The SR is modified by a Note which only requires that the surveillance be met for an open equipment hatch. If the equipment hatch is installed in position, then the availability of the means to install the hatch is not required. SR 3.6.8.3 This Surveillance demonstrates that at least one valve in each open penetration actuates to its isolation position on manual initiation or on an actual or simulated containment isolation signal. The 24 month Frequency maintains consistency with other similar valve testing requirements. The OPERABILITY requirements for the Containment Isolation function are specified in LCO 3.3.2.
REFERENCES	1. WCAP-14837, "AP600 Shutdown Evaluation Report," Revision 3, March 1998. 2. AP600 Probabilistic Risk Assessment.

B 3.6 CONTAINMENT

B 3.6.9 pH Adjustment

BASES

BACKGROUND

The Passive Core Cooling System (PXS) includes two pH adjustment baskets which provide adjustment of the pH of the water in the containment following an accident where the containment floods.

Following an accident with a large release of radioactivity, the containment pH is automatically adjusted to greater than or equal to 7.0, to enhance iodine retention in the containment water. Chemical addition is necessary to counter the affects of the boric acid contained in the safety injection supplies and acids produced in the post-LOCA environment (nitric acid from the irradiation of water and air and hydrochloric acid from irradiation and pyrolysis of electric cable insulation). The desired pH values significantly reduce formation of elemental iodine in the containment water, which reduces the production of organic iodine and the total airborne iodine in the containment. This pH adjustment is also provided to prevent stress corrosion cracking of safety related containment components during long-term cooling.

Dodecahydrate trisodium phosphate (TSP) contained in baskets provides a passive means of pH control for such accidents. The baskets are made of stainless steel with a mesh front that readily permits contact with water. These baskets are located inside containment at an elevation that is below the minimum floodup level. The baskets are placed at least a foot above the floor to reduce the chance that water spills will dissolve the TSP. Natural recirculation of water inside the containment, following a LOCA, is driven by the core decay heat and provides mixing to achieve a uniform pH. The dodecahydrate form of TSP (Na_3PO_4-$12H_2O$) is initially loaded into the baskets because it is hydrated and will undergo less physical and chemical change than would anhydrous Na3PO4 as a result of the humidity inside containment. (Refs. 1 and 2)

(continued)

BASES (continued)

APPLICABLE SAFETY ANALYSES

In the event of a Design Basis Accident (DBA), iodine may be released from the fuel to containment. To limit this iodine release from containment, the pH of the water in the containment sump is adjusted by the addition of TSP. Adjusting the sump water to neutral or alkaline pH (pH $\geq$ 7.0) will augment the retention of the iodine, and thus reduce the iodine available to leak to the environment.

pH adjustment satisfies Criterion 3 of the NRC Policy Statement.

LCO

The requirement to maintain the pH adjustment baskets with $\geq$ [240 ft^3] of TSP assures that for DBA releases of iodine into containment, the pH of the containment sump will be adjusted to enhance the retention of the iodine.

A required volume is specified instead of mass because it is not feasible to weigh the TSP in the containment. The minimum required volume is based on the manufactured density of TSP. This is conservative because the density of TSP may increase after installation due to compaction.

APPLICABILITY

In MODES 1, 2, 3, and 4 a DBA could cause release of radioactive iodine to containment requiring pH adjustment. The pH adjustment baskets assist in reducing the airborne iodine fission product inventory available for release to the environment.

In MODES 5 and 6, the probability and consequences of these events are reduced due to the pressure and temperature limitations of these MODES. Thus, pH adjustment is not required to be OPERABLE in MODES 5 and 6.

ACTIONS

A.1

If the TSP volume in the baskets is not within limits, the iodine retention may be less than that assumed in the accident analysis for the limiting DBA. Due to the very low probability that the volume of TSP may change, the variations are expected to be minor such that the required

(continued)

BASES

ACTIONS

A.1 (continued)

capability is substantially available. The 72 hour Completion Time for restoration to within limits is consistent with times applied to minor degradations of ECCS parameters.

B.1 and B.2

If the Required Actions and associated Completion Times are not met, the plant must be brought to MODE 5 where the probability and consequences on an event are minimized. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 5 within 84 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE REQUIREMENTS

SR 3.6.9.1

The minimum amount of TSP is [240] ft^3. A volume is specified since it is not feasible to weigh the TSP contained in the pH adjustment baskets. This volume is based on providing sufficient TSP to buffer the post accident containment water to a minimum pH of 7.0. Additionally, the TSP volume is based on treating the maximum volume of post accident water ([765,500] gallons) containing the maximum amount of boron ([3007] ppm) as well as other sources of acid. The minimum required mass of TSP is [11,550] pounds.

The minimum required volume of TSP is based on this minimum required mass of TSP, the minimum density of TSP plus margin to account for degradation of TSP during plant operation. The minimum TSP density is based on the manufactured density, since the density may increase and the volume decrease, during plant operation, due to agglomeration from humidity inside the containment. The minimum required TSP volume also has about 10% margin to account for degradation of TSP during plant operation.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.6.9.1 (continued)

The periodic verification is required every 24 months, since access to the TSP baskets is only feasible during outages, and normal fuel cycles are scheduled for 24 months. Operating experience has shown this Surveillance Frequency acceptable due to the margin in the volume of TSP placed in the containment building.

SR 3.6.9.2

Testing must be performed to ensure the solubility and buffering ability of the TSP after exposure to the containment environment. A representative sample of [1.25] grams of TSP from one of the baskets in containment is submerged in ≥ 1 liter of water at a boron concentration of [3007] ppm and at the standard temperature of 25 ± 5°C. Without agitation, the solution pH should be raised to ≥ 7.0 within 4 hours.

The minimum required amount of TSP is sufficient to buffer the maximum amount of boron [3007] ppm, the maximum amount of other acids, and the maximum amount of water [765,500] gallons that can exist in the containment following an accident and achieve a minimum pH of 7.0. Of this amount of TSP, [7124] pounds is required to buffer the boron, without consideration of other sources of acid. The representative sample weight is based on [7124] pounds of TSP plus about 10% margin to account for degradation of TSP during plant operation.

Agitation of the test solution is prohibited, since an adequate standard for the agitation intensity cannot be specified. The test time of 4 hours is necessary to allow time for the dissolved TSP to naturally diffuse through the sample solution. In the post LOCA sump area, rapid mixing would occur due to liquid flow, significantly decreasing the actual amount of time before the required pH is achieved. This would ensure compliance with the Standard Review Plan requirement of a pH ≥ 7.0 by the onset of recirculation after a LOCA.

(continued)

BASES (continued)

REFERENCES

1. Section 6.3.2.1.4, "Containment pH Control."
2. Section 6.3.2.2.4, "pH Adjustment Baskets."
3. Section 15.6.5.3.1, "Identification of Cause and Accident Description."

B 3.6 CONTAINMENT SYSTEMS

B 3.6.10 Passive Autocatalytic Hydrogen Recombiners

BASES

BACKGROUND

The function of the passive autocatalytic recombiners (PARs) is to eliminate the potential challenge to containment integrity due to an uncontrolled hydrogen-oxygen reaction. The PARs provide the safety related hydrogen control measures following a design basis accident.

Per 10 CFR 50.44, "Standards for Combustible Gas Control Systems in Light-Water Cooled Reactors," (Ref. 1), and GDC 41, "Containment Atmosphere Cleanup" (Ref. 2), hydrogen recombiners are required to reduce the hydrogen concentration in the containment following a loss of coolant accident (LOCA) or steam line break (SLB). The PARs accomplish this by recombining hydrogen and oxygen to form water vapor. The vapor remains in containment, thus eliminating any discharge to the environment. The PARs are self initiated in the presence of hydrogen.

Two global 100 percent capacity independent PARs are provided. In addition, compartment PARs are located in the IRWST vent and in the CVS compartment. The two PARs have been located in confined areas as assurance that the hydrogen control function can be accomplished. However, one global PAR in combination with gas diffusion and natural circulation from the compartments will provide the hydrogen control function. The PARs are passive devices which contain no moving parts and do not need electrical power or any other support system. Recombination is accomplished by the attraction of oxygen and hydrogen molecules to the surface of the catalyst. The two gases are combined to form water vapor via an exothermic reaction. The heat produced by the reaction causes the air to rise within the enclosure by natural convection. As it rises, replacement air is drawn into the PAR through the bottom, and is exhausted through the chimney where the hot gases mix with the containment atmosphere. The device is a molecular diffusion filter, not a fixed bed particle filter, and thus the open flow channels are not susceptible to fouling. A single global PAR is capable of maintaining the hydrogen concentration in containment below the 4.0 volume percent (v/o) flammability limit following a DBA. Since PARs are

(continued)

BASES

BACKGROUND (continued)

not subject to single failure, the second global PAR is installed as a spare and provides the ability to continue operations for a limited time, in the event one PAR is declared inoperable. There are no installed spares for the IRWST and CVS compartment PARs. These units are controlling hydrogen in smaller areas, they are easier to maintain and are not as critical in controlling global or local concentrations. That is, should the IRWST and CVS units be unavailable gas diffusion and natural circulation will assist in limiting hydrogen concentrations. The PARs will operate following any accident which results in hydrogen generation, independent of the availability of offsite or onsite power.

APPLICABLE SAFETY ANALYSES

The PARs provide for the capability of controlling the bulk and local hydrogen in containment to less than the lower flammable concentration of 4.0 v/o following a DBA. This control would prevent an uncontrolled hydrogen burn, thus ensuring the containment pressure and temperature assumed in the analysis are not exceeded. The limiting DBA relative to hydrogen generation is a LOCA.

Hydrogen may accumulate in containment following a LOCA as a result of:

a. A metal-steam reaction between the zirconium fuel-rod cladding and the reactor coolant;

b. Radiolytic decomposition of water in the Reactor Coolant System (RCS) and the containment sump;

c. Hydrogen in the RCS at the time of the LOCA (i.e., hydrogen dissolved in the reactor coolant and hydrogen gas in the pressurizer vapor space); or

d. Corrosion of metals exposed to the post-accident environment.

To evaluate the potential for hydrogen accumulation in containment following a LOCA, the hydrogen generation is calculated as a function of time following the initiation of the accident. Conservative assumptions recommended by Reference 3 are used to maximize the amount of hydrogen calculated. As such, the PARs are designed to control the

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

amount of hydrogen generation in containment considerably in excess of the amount that would be expected from the limiting DBA LOCA.

Based on the conservative assumptions used to calculate the hydrogen concentration versus time after a LOCA, the hydrogen concentration in the primary containment would reach 3.5 v/o about 20 days after the LOCA and 4.0 v/o about 8 days later if no recombiner was functioning (Ref. 4).

The PARs are designed such that, with the conservatively calculated hydrogen generation rates discussed above, a single PAR is capable of limiting the peak hydrogen concentration in containment to less than 4.0 v/o (Ref. 4).

The PARs satisfy Criterion 3 of the NRC Policy Statement.

LCO

Four PARs must be OPERABLE; two global and two compartment PARs. Since the PARs are not subject to a single active failure, one global PAR is, in effect, an installed spare, thus allowing continued operation in accordance with Action A, in the event one global PAR is determined to be inoperable.

Two compartment PARs shall be OPERABLE; one in the IRWST vent and one in the CVS compartment. One global PAR in combination with gas diffusion and natural circulation from the compartments will provide the hydrogen control function. However, the two PARs have been located in confined areas as added assurance that the post-accident hydrogen control function can be accomplished.

APPLICABILITY

In MODES 1 and 2, the PARs are required to control the hydrogen concentration within containment below its flammability limit of 4.0 v/o.

(continued)

BASES

APPLICABILITY (continued)

In MODES 3 and 4, both the hydrogen production rate and the total hydrogen produced after a LOCA would be less than that calculated for the DBA LOCA. Also, because of limited time in these MODES, the probability of an accident requiring the PARs is low. Therefore, the PARs are not required in MODE 3 or 4.

In MODES 5 and 6, the probability and consequences of a LOCA are low due to the pressure and temperature limitations in these MODES. Therefore, the PARs are not required in these MODES.

ACTIONS

A.1

With one PAR inoperable, the inoperable PAR must be restored to OPERABLE status within 30 days. If one of the global PARs is inoperable, the remaining OPERABLE PARs are capable of performing 100% of the hydrogen control function. If either of the compartment PARs is inoperable, the compartment hydrogen concentration is controlled by diffusion and mixing. In this condition, the diffusion and mixing is enhanced by the low hydrogen concentration produced by the two OPERABLE global PARs, thus providing greater assurance that the hydrogen control function can be accomplished. The 30 day Completion Time is based on the ability to perform the safety function and that no single failure of the remaining PAR is postulated. The Completion Time is further supported by the low probability of a LOCA or SLB (that would generate hydrogen in amounts capable of exceeding the flammability limit), and the length of time after the LOCA or SLB that operator action would be required to prevent hydrogen accumulation from exceeding this limit.

Required Action A.1 is modified by a Note which states the provisions of LCO 3.0.4 are not applicable. As a result, a MODE change is allowed when one PAR is inoperable. This allowance is provided because the remaining OPERABLE PARs are capable of performing the safety function, the small probability of a LOCA or SLB occurring (that would generate hydrogen in amounts capable of exceeding the flammability limit), the remaining OPERABLE PARs are not subject to a single failure, and the length of time after a postulated LOCA before operator action would be required to prevent exceeding the flammability limit.

(continued)

BASES

ACTIONS (continued)

B.1 and B.2

With two or more PARs inoperable, the ability to perform the hydrogen control function via alternate capabilities must be verified by administrative means within 1 hour. The alternate hydrogen control capabilities are provided by the containment Hydrogen Ignitor System. The 1 hour Completion Time allows a reasonable period of time to verify that a loss of hydrogen control function does not exist. In addition, the alternate hydrogen control system capability must be verified once per 12 hours thereafter to ensure its continued availability. Both the initial verification and all subsequent verifications may be performed as an administrative check, by examining logs or other information, to determine the availability of the alternate hydrogen control system. It does not mean to perform the Surveillances needed to demonstrate OPERABILITY of the alternate hydrogen control system. If the ability to perform the hydrogen control function is maintained, continued operation is permitted with two or more PARs inoperable for up to 7 days. 7 days is a reasonable time to allow PARs to be inoperable because the hydrogen control function is maintained and because of the low probability of the occurrence of a LOCA that would generate hydrogen in the amounts capable of exceeding the flammability limit.

C.1

If the inoperable PAR(s) cannot be restored to OPERABLE status within the required Completion Time, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours. The allowed Completion Time of 6 hours is reasonable, based on operating experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE REQUIREMENTS

SR 3.6.10.1

This Surveillance Requirement ensures there are no physical obstructions to air flow that could affect recombiner operation. A visual inspection of each PAR is sufficient to

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.6.10.1 (continued)

verify that there is no obstruction or blockage of the inlets or outlets. The 24 month Frequency is adequate, considering there are no known sources of PAR obstruction or blockage.

SR 3.6.10.2

This Surveillance Requirement requires removal and testing of a specimen sample from each of the PARs, and it subjects the sample to bench tests to confirm continued satisfactory performance. The bench test evaluates the recombination rate as a result of specimen exposure to a known air/hydrogen sample, and it demonstrates that the catalyst continues to be OPERABLE. The 24 month Frequency for this SR was developed considering the simplicity of the passive PAR devices, the low potential for degradation of the catalyst material, and the significant performance margin discussed in Reference 4. The catalyst is not expected to degrade over its useful lifetime and surveillance on a 24 month Frequency is adequate to observe degradation.

REFERENCES

1. 10 CFR 50.44.
2. 10 CFR 50, Appendix A, GDC 41.
3. Regulatory Guide 1.7, Rev. 2.
4. Section 6.2.4, "Containment Hydrogen Control Systems."

B 3.7 PLANT SYSTEMS

B 3.7.1 Main Steam Safety Valves (MSSVs)

BASES

BACKGROUND

The primary purpose of the MSSVs is to provide overpressure protection for the secondary system. The MSSVs also provide protection against overpressurizing the reactor coolant pressure boundary (RCPB) by providing a heat sink for the removal of energy from the Reactor Coolant System (RCS) if the preferred heat sink, provided by the Condenser and Circulating Water System, is not available.

Three MSSVs are located on each main steam header, outside containment, upstream of the main steam isolation valves, as described in Reference 1. The MSSV design includes staggered setpoints, as shown in Table 3.7.1-2 of the specification, so that only the needed valves actuate. Staggered setpoints reduce the potential for valve chattering that is due to steam pressure insufficient to fully open the valves following a turbine-reactor trip.

APPLICABLE SAFETY ANALYSES

The design basis for the MSSVs comes from Reference 2 and its purpose is to limit the secondary system pressure to $\leq$ 110% of design pressure under any system upset or emergency conditions. This design basis is sufficient to cope with any anticipated operating occurrence (AOO) or accident considered in the Design Basis Accident (DBA) and transient analysis.

The events that challenge the relieving capacity of the MSSVs, and thus steam generator pressure, are those characterized as decreased heat removal events, which are presented in Section 15.2 (Ref. 3). Of these, the full power turbine trip without turbine bypass is the limiting AOO. This event also terminates normal feedwater flow to the steam generators.

The transient response for turbine trip without a direct reactor trip presents no hazard to the integrity of the RCS

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

or the Main Steam System. The reactor is tripped on high pressurizer pressure. Pressurizer safety valves and MSSVs are activated and prevent overpressurization in the primary and secondary systems. The MSSVs are assumed to have two active and one passive failure modes. The active failure modes are spurious opening, and failure to reclose once opened. The passive failure mode is failure to open upon demand.

The MSSVs satisfy Criterion 3 of the NRC Policy Statement.

LCO

The accident analysis requires three MSSVs per steam generator to provide overpressure protection for design basis transients occurring at 102% of RTP. A MSSV will be considered inoperable if it fails to open in the event of a pressure excursion in excess of the setpoint. The LCO requires that three MSSVs be OPERABLE in compliance with Reference 2. Operation with less than the full number of MSSVs requires limitations on allowable THERMAL POWER (to meet ASME Code requirements). These limitations are according to Table 3.7.1-1 of the specification and Required Action A.1.

The OPERABILITY of the MSSVs is defined as the ability to open within the setpoint tolerances, relieve steam generator overpressure, and reseat when pressure has been reduced. The OPERABILITY of the MSSVs is determined by periodic surveillance testing in accordance with the Inservice Testing Program.

The lift settings specified in Table 3.7.1-2 in the accompanying LCO, correspond to ambient conditions of the valve at nominal operating temperature and pressure.

This LCO provides assurance that the MSSVs will perform their designed safety functions to mitigate the consequences of accidents that could result in a challenge to the RCPB.

(continued)

BASES (continued)

APPLICABILITY

In MODE 1 at or above 67% RTP, three MSSVs per steam generator are required to be OPERABLE. Below 67% RTP in MODE 1, 2, 3, or 4 (without the normal residual heat removal system in service), only two MSSVs per steam generator are required to be OPERABLE.

In MODES 4 (with the normal residual heat removal system in service) and 5, there are no credible transients requiring the MSSVs. The steam generators are not normally used for heat removal in MODES 5 and 6, and thus cannot be overpressurized. There is no requirement for the MSSVs to be OPERABLE in these MODES.

ACTIONS

The ACTIONS table is modified by a Note indicating that separate Condition entry is allowed for each MSSV.

A.1

With one or more MSSVs inoperable, reduce power so that the available MSSV relieving capacity meets Reference 2 requirements for the applicable THERMAL POWER.

Operation with less than all three MSSVs OPERABLE for each steam generator is permissible, if THERMAL POWER is proportionally limited to the relief capacity of the remaining MSSVs. This is accomplished by restricting THERMAL POWER so that the energy transfer to the most limiting steam generator is not greater than the available relief capacity in that steam generator. For example, if one MSSV is inoperable in one steam generator, the relief capacity of that steam generator is reduced by approximately 33%. To offset this reduction in relief capacity, energy transfer to that steam generator must be similarly reduced by at least 33%. This is accomplished by reducing THERMAL POWER by at least 33%, which conservatively limits the energy transfer to both steam generators to approximately 67% of total capacity, consistent with the relief capacity of the most limiting steam generator.

For each steam generator, at a specified pressure, the fractional relief capacity (FRC) of each MSSV is determined as follows:

$$FRC = \frac{A}{B}$$

(continued)

BASES

ACTIONS

A.1 (continued)

where:

A = the relief capacity of the MSSV; and

B = the total relief capacity of all the MSSVs of the steam generator

The FRC is the relief capacity necessary to address operation with reduced THERMAL POWER.

The reduced THERMAL POWER levels in the LCO, prevent operation at power levels greater than the relief capacity of the remaining MSSVs. The reduced THERMAL POWER is determined as follows:

$$RP = [1 - (N_1 \times FRC_1 + N_2 \times FRC_2 + N_3 \times FRC_3)] \times 100\%$$

where:

RP = Reduced THERMAL POWER for the most limiting steam generator expressed as a percent of RTP;

N_1, N_2, N_3 represent the status of MSSV 1, 2, and 3, respectively,

= 0 if the MSSV is OPERABLE,
= 1 if the MSSV is inoperable;

FRC_1, FRC_2, FRC_3 = the relief capacity of MSSV 1, 2, and 3, respectively, as defined above.

B.1 and B.2

If the MSSVs cannot be restored to OPERABLE status within the associated Completion Time, or if one or more steam generators have less than two MSSVs OPERABLE, the unit must be placed in MODE 4 where the probability and consequences of an event are minimized. To achieve this status, the plant must be placed in at least MODE 3 within 6 hours, and in MODE 4, with RCS cooling provided by the RNS, within 24 hours. The allowed Completion Times are reasonable,

(continued)

BASES

ACTIONS

B.1 and B.2 (continued)

based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE REQUIREMENTS

SR 3.7.1.1

This SR verifies the OPERABILITY of the MSSVs by the verification of each MSSV lift setpoint in accordance with the Inservice Testing Program. The ASME Code, Section XI (Ref. 4), requires that safety and relief valve tests be performed in accordance with ASME OM Code-1990 (Ref. 5). According to Reference 5, the following tests are required:

a. Visual examination;

b. Seat tightness determination;

c. Set pressure determination (lift setting);

d. Compliance with owner's seat tightness criteria; and

e. Verification of the balancing device integrity on balanced valves.

The ANSI/ASME standard requires that all valves be tested every 5 years, and a minimum of 20% of the valves be tested every 24 months. The ASME Code specifies the activities and frequencies necessary to satisfy the requirements. Table 3.7.1-2 allows a ±3% setpoint tolerance for OPERABILITY; however, the valves are reset to ±1% during the Surveillance to allow for drift.

This SR is modified by a Note that allows entry into and operation in MODE 3 prior to performing the SR. The MSSVs may be either bench tested or tested in situ at hot conditions using an assist device to simulate lift pressure. If the MSSVs are not tested at hot conditions, the lift setting pressure shall be corrected to ambient conditions of the valve at operating temperature and pressure.

(continued)

BASES (continued)

REFERENCES

1. Chapter 10, "Steam and Power Conversion Systems Description."

2. ASME Boiler and Pressure Vessel Code, Section III, Article NC-7000, "Overpressure Protection," Class 2 Components.

3. Section 15.2, "Decreased Heat Removal by Secondary System."

4. ASME Boiler and Pressure Vessel Code, Section XI, Article IV-3500, "Inservice Test: Category C Valves."

5. ASME OM Code-1990, "Requirements for Inservice Performance Testing of Nuclear Power Plant Pressure Relief Devices in Light Water Reactor Power Plants."

B 3.7 PLANT SYSTEMS

B 3.7.2 Main Steam Isolation Valves (MSIVs)

BASES

BACKGROUND

Each main steamline has one safety related MSIV to isolate steam flow from the secondary side of the steam generators following a high energy line break. MSIV closure terminates flow from the unaffected (intact) steam generator.

One MSIV is located in each main steam line outside containment. The MSIVs are downstream from the main steam safety valves (MSSVs). Downstream from the MSIVs, main steam enters the high pressure turbine through four stop valves and four governing control valves. Closing the MSIVs isolates each steam generator from the other and isolates the turbine bypass system, and other steam supplies from the steam generator.

The MSIVs, turbine stop and control valves, turbine bypass valves, and moisture separator reheat supply steam control valve close on a main steam isolation signal generated by either low steam line pressure, high containment pressure, Low T_{cold}, or high negative steam pressure rate. The MSIVs fail closed on loss of control air or actuation signal from either of two 1E power divisions.

Each MSIV has an MSIV bypass valve. Although these bypass valves are normally closed, they receive the same emergency closure signal as do their associated MSIVs. The MSIVs may also be actuated manually.

A description of the MSIVs is found in the Section 10.3 (Ref. 1). Descriptions for the turbine bypass valves, and moisture separator reheat supply steam control valve are found in the Section 10.4 (Ref. 6).

APPLICABLE SAFETY ANALYSES

The design basis of the MSIVs is established by the containment analysis for the large steam line break (SLB) inside containment, discussed in the Section 6.2 (Ref. 2). It is also affected by the accident analysis of the SLB events presented in the Section 15.1 (Ref. 3). The design precludes the blowdown of more than one steam generator, assuming a single active component failure (e.g., the failure of one MSIV to close on demand).

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

Design basis events of concern for containment analysis are SLB inside containment with the failure of the associated MSIV to close, or a main feedline break with the associated failure of a feedline isolation or control valve to close. At lower powers, the steam generator inventory and temperature are at their maximum, maximizing the analyzed mass and energy release to the containment. Due to reverse flow and failure of the MSIV to close, the additional mass and energy in the steam headers, downstream from the other MSIV, contribute to the total release. With the most reactive rod cluster control assembly assumed stuck in the fully withdrawn position, there is an increased possibility that the core will become critical and return to power. The core is ultimately shut down by the boric acid injection delivered by the Core Makeup Tanks (CMTs).

The accident analysis compares several different SLB events against different acceptance criteria. The large SLB outside containment upstream of the MSIV is limiting for offsite dose, although a break in this short section of main steam header has a very low probability. The large SLB inside containment at hot zero power is the limiting case for a post trip return to power. The analysis includes consideration of scenarios with offsite power available, and with a loss of offsite power. With offsite power available, the reactor coolant pumps continue to circulate coolant for a longer period through the steam generators, maximizing the Reactor Coolant System cooldown. The reactor protection system includes a safety related signal that initiates the coastdown of the reactor coolant pumps early in the large SLB transient. Therefore, there is very little difference in the predicted departure from nucleate boiling ratio between cases with and without offsite power. Significant single failures considered include failure of an MSIV to close.

The non-safety related turbine stop or control valves, in combination with the turbine bypass, and moisture separator reheat supply steam control valves, are assumed as a backup to isolate the steam flow path given a single failure of an MSIV. The safety analyses do not differentiate between the availability of the turbine stop valve or its series control valve. Either the turbine stop valves or its associated turbine control valve are required by this LCO to be OPERABLE. These valves, along with the turbine bypass, and

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

moisture separator reheat supply steam control valves are considered as alternate downstream valves.

The MSIVs serve a safety related function and remain open during power operation. These valves operate under the following situations:

a. High energy line break inside containment. In order to maximize the mass and energy release into containment, the analysis assumes that the MSIV in the affected steam generator remains open. For this accident scenario, steam is discharged into containment from both steam generators until the unaffected loop MSIV closes. After MSIV closure, steam is discharged into containment only from the affected steam generator and from the residual steam in the main steam header downstream of the closed MSIV in the unaffected loop. Closure of the MSIV isolates the break from the unaffected steam generator.

b. A break outside of containment, and upstream or downstream from the MSIVs, is not a containment pressurization concern. The uncontrolled blowdown of more than one steam generator must be prevented to limit the potential for uncontrolled RCS cooldown and positive reactivity addition. Closure of the MSIVs or alternate downstream valves isolates the break, and limits the blowdown to a single steam generator.

c. Following a steam generator tube rupture, closure of the MSIVs isolates the ruptured steam generator to minimize radiological releases.

d. The MSIVs are also utilized during other events such as a feedwater line break; however, these events are less limiting so far as MSIV OPERABILITY is concerned.

The MSIVs and the alternate downstream valves satisfy Criterion 3 of the NRC Policy Statement.

Following an SLB and main steam isolation signal, the analyses assume continued steam loss through the steamline condensate drain lines, turbine gland seal system, and the main steam to auxiliary steam header which supplies the auxiliary steam line to the deaerator. Since these valves are not assumed for steam isolation, they do not satisfy the NRC Policy Statement criteria.

(continued)

BASES (continued)

LCO

This LCO requires that one MSIV in each of the two steam lines be OPERABLE. The MSIVs are considered OPERABLE when their isolation times are within limits, and they close on an isolation actuation signal.

This LCO requires that four turbine stop valves or their associated turbine control valve, four turbine bypass valves, and one moisture separator reheat supply steam control valve be OPERABLE. A valve is considered operable when its isolation time is within the safety analysis isolation time limit of 5 seconds and it closes on an MSIV actuation signal. The turbine bypass valves are alternatively considered OPERABLE when closed and administratively maintained closed with automatic actuation blocked as appropriate.

This LCO provides assurance that the MSIVs will perform their design safety function to mitigate the consequences of accidents that could result in offsite exposures comparable to the 10 CFR 100 limits or the NRC staff approved licensing basis.

This LCO provides assurance that the design and performance of the alternate downstream valves are compatible with the accident conditions for which they are called upon to function (Ref. 5).

APPLICABILITY

The MSIVs, turbine stop or associated turbine control valves, turbine bypass valves, and moisture separator reheat supply steam control valve must be OPERABLE in MODE 1 and MODES 2, 3, and 4, except when steam flow is isolated when there is significant mass and energy in the RCS and steam generators. Therefore, these valves must be OPERABLE or closed. When these valves are closed, they are already performing their required function.

In MODE 5 or 6, the steam generators do not contain much energy because their temperature is below the boiling point of water; therefore, the MSIVs and alternate downstream valves are not required for isolation of potential high energy secondary system pipe breaks in these MODES.

(continued)

BASES (continued)

ACTIONS

A.1

With one MSIV inoperable in MODE 1, action must be taken to restore OPERABLE status within 8 hours. Some repairs to the valves can be made with the plant hot. The 8 hour Completion Time is reasonable considering the low probability of an accident occurring during this time period that would require a closure of these valves. With a single MSIV inoperable, the safety function, isolation of the steam flow path, is provided by the OPERABLE alternate downstream valves, but cannot accommodate a single failure. The assumptions and criteria of the accident analyses are preserved by the ability to automatically isolate the steam flow path.

The 8 hour Completion Time is greater than that normally allowed for containment isolation valves because the MSIVs are valves that isolate a closed system penetrating containment. These valves differ from other containment isolation valves in that the closed system provides a positive means for containment isolation.

B.1

With any number of the turbine stop valves and the associated turbine control valve, turbine bypass, or moisture separator reheat supply steam control valves inoperable in MODE 1, action must be taken to restore OPERABLE status within 72 hours. Some repairs to the valves can be made with the plant hot. The 72 hour Completion Time is reasonable considering the low probability of an accident occurring during this time period that would require a closure of these valves. With the backup isolation valves inoperable, the safety function, isolation of the steam flow path, is provided by the remaining OPERABLE valves, but cannot accommodate a single failure. The assumptions and criteria of the accident analyses are preserved by the ability to automatically isolate the steam flow path.

C.1

With two MSIVs inoperable in MODE 1 or one MSIV and an alternate downstream valve inoperable or if the valves cannot be restored to OPERABLE status in accordance with Required Action A.1 or B.1, the unit must be placed in a MODE in which the LCO does not apply. To achieve this

(continued)

BASES

ACTIONS

C.1 (continued)

status, the unit must be placed in MODE 2 within 6 hours and Condition D would be entered. The Completion Time is reasonable, based on operating experience, to reach MODE 2 in an orderly manner and without challenging unit systems.

D.1 and D.2

Condition D is modified by a Note indicating that a separate Condition entry is allowed for each MSIV.

Since the MSIVs are required to be OPERABLE in MODES 2, 3, and 4, the inoperable MSIVs may either be restored to OPERABLE status or closed. When closed, the MSIVs are already in the position required by the assumptions in the safety analysis.

The 8 hour Completion Time is consistent with that allowed in Condition A, and conservative considering the reduced energy in the steam generators in MODES 2, 3, and 4.

For inoperable MSIVs that cannot be restored to OPERABLE status within the specified Completion Time but were closed, these inoperable valves must be verified to be continually closed on a periodic basis. This is necessary to ensure that the assumptions in the safety analyses remain valid. The 7 day Completion Time is based on engineering judgment, and is considered reasonable in view of MSIV status indications available in the control room and other administrative controls which ensure that these valves will continue to be closed.

E.1 and E.2

If the MSIVs cannot be restored to OPERABLE status or closed within the associated Completion Times of Condition D, the unit must be placed in MODE 4 with normal residual heat removal system in service where the probability and consequences of an event are minimized. To achieve this status, the plant must be placed in at least MODE 3 within 6 hours, and in MODE 4 with normal residual heat removal system in service within 24 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging plant systems.

(continued)

BASES (continued)

SURVEILLANCE REQUIREMENTS

SR 3.7.2.1

The MSIV closure time is assumed in the accident and containment analyses. This Surveillance is normally performed upon returning the plant to operation following a refueling outage. The MSIVs should not be full stroke tested at power, since the resulting plant transient is significant when the plant is generating power. A partial valve stroke (approximately 10%) is performed during plant operation and has minimal perturbation on plant operations but ensures the freedom of valve movement. The MSIVs surveillance tests are performed in accordance with the Inservice Testing Program.

The Frequency is in accordance with the Inservice Testing Program. The minimum Surveillance Frequency to demonstrate valve closure time is based on the refueling cycle. The Frequency was concluded to be acceptable from a reliability standpoint.

This Surveillance is modified by a Note that allows entry into and operation in MODES 3 and 4 prior to performing the SR. This test is conducted in MODE 3 with the plant at operating temperature and pressure, in accordance with the Inservice Testing Program. This allows a delay of testing until MODE 3, in order to establish conditions consistent with those under which the test criterion was generated.

SR 3.7.2.2

Because the MSIV closure time is assumed for steam flow isolation in the accident and containment analyses, the alternate downstream valves must meet the MSIV closure time. This Surveillance is normally performed upon returning the plant to operation following a refueling outage. The alternate downstream valves should not be full stroke tested at power, since the resulting plant transient is significant when the plant is generating power. A partial valve stroke (approximately 10%) is performed during plant operation and has minimal perturbation on plant operations but ensures the freedom of valve movement. The surveillance tests for the turbine stop and turbine control valves, turbine bypass valves, and moisture separator reheat supply steam control valve are performed in accordance with the Inservice Testing Program.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.7.2.2 (continued)

The Frequency is in accordance with the Inservice Testing Program. The minimum Surveillance Frequency to demonstrate valve closure time is based on the refueling cycle. The Frequency was concluded to be acceptable from a reliability standpoint.

This Surveillance is modified by a Note that allows entry into and operation in MODES 3 and 4 prior to performing the SR. This test is conducted in MODE 3 with the plant at operating temperature and pressure, in accordance with the Inservice Testing Program. This allows a delay of testing until MODE 3, in order to establish conditions consistent with those under which the test criterion was generated.

REFERENCES

1. Section 10.3, "Main Steam System."
2. Section 6.2.1, "Containment Functional Design."
3. Section 15.1, "Increase in Heat Removal by Secondary System."
4. Section 10.2, "Turbine Generator."
5. NUREG-138, Issue 1, "Staff Discussion of Fifteen Technical Issues Listed in Attachment to November 3, 1976 Memorandum from Director NRR to NRR Staff."
6. Section 10.4, "Other Features of Steam and Power Conversion Systems."

B 3.7 PLANT SYSTEMS

B 3.7.3 Main Feedwater Isolation and Control Valves (MFIVs and MFCVs)

BASES

BACKGROUND

The MFIVs isolate main feedwater (MFW) flow to the secondary side of the steam generators following a high energy line break. The safety related function of the MFCVs is to provide the second isolation of MFW flow to the secondary side of the steam generators following a high energy line break. Closure of the MFIVs or MFCVs terminates flow to the steam generators, terminating the event for feedwater line breaks occurring upstream of the MFIVs or MFCVs. The consequences of events occurring in the main steam lines or in the MFW lines downstream from the MFIVs will be mitigated by their closure. Closure of the MFIVs or MFCVs, effectively terminates the addition of main feedwater to an affected steam generator, limiting the mass and energy release for steam or feedwater line breaks inside containment, and reducing the cooldown effects for steam line breaks (SLBs).

The MFIVs or MFCVs isolate the nonsafety related portions from the safety related portions of the system. In the event of a secondary side pipe rupture inside containment, the valves limit the quantity of high energy fluid that enters containment through the break, and provide a pressure boundary for the controlled addition of startup feedwater (SFW) to the intact loops of the steam generator.

One MFIV and one MFCV are located on each MFW line, outside but close to containment. The MFIVs and MFCVs are located in the MFW line and are independent of the delivery of the MFW or SFW via the SFW line which is separately connected and isolated from the steam generator. This configuration permits MFW or SFW to be supplied to the steam generators following MFIV or MFCV closure. The piping volume from these valves to the steam generators must be accounted for in calculating mass and energy releases following either an SLB or FWLB.

The MFIVs and MFCVs close on receipt of engineered safeguards feedwater isolation signal generated from any of the following conditions:

(continued)

BASES

BACKGROUND (continued)

- Automatic or manual safeguards actuation "S" signal
- High steam generator level
- Low-2 T_{avg} signal coincident with reactor trip (P-4)
- Manual actuation

Additionally, the MFIVs close automatically on a Low-1 T_{avg} coincident with reactor trip (P-4). Each valve may be actuated manually. In addition to the MFIVs and the MFCVs, a check valve is available outside containment to isolate the feedwater line penetrating containment. In the event of feedwater line depressurization due to pump trip on line break, the check valve provides rapid backup isolation of the steam generators limiting the inventory loss. A description of the MFIVs and MFCVs is found in Reference 1.

APPLICABLE SAFETY ANALYSES

The design basis of the MFIVs and MFCVs is established by the analyses for the large SLB. It is also influenced by the accident analysis for the large Feedwater Line Break (FWLB). Closure of the MFIVs (or MFCVs) may also be relied on to mitigate an SLB for core response analysis and excess feedwater event upon the receipt of a steam generator water level – High 2 signal.

Failure of an MFIV (or MFCV), to close following an SLB or FWLB, can result in additional mass and energy being delivered to the steam generators, contributing to cooldown. This failure also results in additional mass and energy releases following an SLB or FWLB event.

The MFIVs and MFCVs satisfy Criterion 3 of the NRC Policy Statement.

LCO

This LCO ensures that the MFIVs and the MFCVs will isolate the main feedwater system.

This LCO requires that the one isolation valve and one control valve on each feedwater line be OPERABLE. These valves are considered OPERABLE when their isolation times are within limits and they close on an isolation actuation signal.

(continued)

BASES

LCO (continued)

Failure to meet the LCO requirements can result in additional mass and energy being released to containment following an SLB or FWLB inside containment. A main feedwater isolation signal on high steam generator level is relied on to terminate an excess feedwater flow event, and therefore failure to meet the LCO may result in the introduction of water into the main steam lines.

APPLICABILITY

The MFIVs and MFCVs must be OPERABLE whenever there is significant mass and energy in the Reactor Coolant System and the steam generators. This ensures that, in the event of a high energy line break, a single failure cannot result in the blowdown of more than one steam generator. In MODE 1, 2, 3, or 4, these valves are required to be OPERABLE to limit the amount of available fluid that could be added to the containment in the case of a secondary system pipe break inside containment. When the valves are closed and deactivated or isolated by a closed manual valve, they are already performing their safety function.

In MODES 5 and 6 steam generator energy is low. Therefore, the MFIVs and the MFCVs are normally closed since MFW is not required.

ACTIONS

A.1, A.2, B.1, and B.2

The Actions table is modified by a Note indicating that separate condition entry is allowed for each valve. With one or two MFIVs, or one or two MFCVs inoperable, close or isolate inoperable affected flow path in 72 hours. When these flow paths are isolated, they are performing their required safety function.

The 72 hour Completion Time takes into account the redundancy afforded by the remaining OPERABLE valves, and the low probability of an event that would require isolation of the main feedwater flow paths occurring during this period.

For inoperable MFIVs and MFCVs valves that cannot be restored to OPERABLE status within the specified Completion Time but are closed or isolated, the flow paths must be

(continued)

BASES

ACTIONS

A.1, A.2, B.1, and B.2 (continued)

verified on a periodic basis to be closed or isolated. This is necessary to ensure that the assumptions in the safety analyses remain valid. The 7 day Completion Time is reasonable based on engineering judgment, in view of valve status indications available in the control room, and other administrative controls, to ensure that these valves are closed or isolated.

C.1

With two inoperable valves in the same flow path there may be no redundant system to operate automatically and perform the required safety function. Under these conditions, one valve in the affected flow path must be restored to OPERABLE status, or the affected flow path isolated within 8 hours. This action returns the system to the situation in which at least one valve in the affected flow path is performing the required safety function. The 8 hour Completion Time is a reasonable amount of time to complete the actions required to close the MFIV, or MFCV, which includes performing a controlled plant shutdown. The Completion Time is reasonable based on operating experience to reach MODE 2 with the MFIV or MFCV closed, from full-power conditions in an orderly manner and without challenging plant systems.

D.1, D.2, and D.3

If the MFIVs and MFCVs cannot be restored to OPERABLE status, or closed, or isolated within the associated Completion Time, the unit must be placed in a mode in which the LCO does not apply. To achieve this status, the plant must be placed in at least MODE 3 within 6 hours, in MODE 4 with the normal residual heat removal system in service within 24 hours, and the affected flow path isolated within 36 hours or in MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging plant systems.

(continued)

BASES (continued)

SURVEILLANCE REQUIREMENTS	SR 3.7.3.1 The MFIV and MFCV closure times are assumed in the accident and containment analyses. This surveillance is normally performed prior to returning the plant to operation following a refueling outage. These valves should not be full stroke tested at power since the resulting plant transient, as a consequence of the valve closure, is significant. A partial stroke test of the MFIV (approximately 10%) is performed during plant operation and has no perturbation on plant operation but ensures the freedom of valve movement. Normal feedwater control operations confirms freedom of valve movement for the MFCV. The MFCV and MFIV surveillance tests are consistent with the Inservice Testing Program and the ASME code, Section XI (Ref. 2). The Frequency is in accordance with the Inservice Testing Program. The Surveillance is modified by a Note that allows entry into and operation in MODES 3 and 4 prior to performing the SR. This allows delaying testing in MODE 3 in order to establish conditions consistent with the conditions under which the test criterion was generated.
REFERENCES	1. Section 10.4.7, "Condensate and Feedwater System." 2. ASME, Boiler and Pressure Vessel Code, Section XI.

B 3.7 PLANT SYSTEMS

B 3.7.4 Secondary Specific Activity

BASES

BACKGROUND

Activity in the secondary coolant results from steam generator tube leakage from the Reactor Coolant System (RCS). Under steady state conditions, the activity is primarily iodines with relatively short half lives and, thus, indicates current conditions. During transients, I-131 spikes have been observed as well as increased releases of some noble gases. Other fission product isotopes, as well as activated corrosion products in lesser amounts, may also be found in the secondary coolant. While fission products present in the primary coolant, as well as activated corrosion products, enter the secondary coolant system due to the primary to secondary leakage, only the iodines are of a concern relative to airborne release of activity in the event of an accident or abnormal occurrence (radioactive noble gases that enter the secondary side are not retained in the coolant but are released to the environment via the condenser air removal system throughout normal operation).

The limit on secondary coolant radioactive iodines minimizes releases to the environment due to anticipated operational occurrences or postulated accidents.

APPLICABLE SAFETY ANALYSES

The accident analysis of the main steam line break (SLB) as discussed in Chapter 15 (Ref. 1) assumes the initial secondary coolant specific activity to have a radioactive isotope concentration of 0.04 μCi/gm DOSE EQUIVALENT I-131. This assumption is used in the analysis for determining the radiological consequences of the postulated accident. The accident analysis, based on this and other assumptions, shows that the radiological consequences of a postulated SLB are within the acceptance criteria in SRP Section 15.1.5, Appendix A, and within the exposure guideline values of 10 CFR Part 50.34.

Secondary specific activity satisfies Criterion 2 of the NRC Policy Statement.

(continued)

BASES (continued)

LCO

As indicated in the Applicable Safety Analyses, the specific activity limit of the secondary coolant is required to be $\leq$ 0.04 μCi/gm DOSE EQUIVALENT I-131 to maintain the validity of the analyses reported in Chapter 15 (Ref. 1). Monitoring the specific activity of the secondary coolant ensures that when secondary specific activity limits are exceeded, appropriate actions are taken in a timely manner to place the unit in an operational MODE that would minimize the radiological consequences of a DBA.

APPLICABILITY

In MODES 1, 2, 3, and 4 the limits on secondary specific activity apply due to the potential for secondary steam releases to the atmosphere.

In MODES 5 and 6, the steam generators are not being used for heat removal. Both the RCS and steam generators are depressurized, and primary to secondary leakage is minimal. Therefore, monitoring of secondary specific activity is not required.

ACTIONS

A.1 and A.2

DOSE EQUIVALENT I-131 exceeding the allowable value in the secondary coolant, is an indication of a problem in the RCS and contributes to increased post accident doses. If the secondary specific activity cannot be restored to within limits within the associated Completion Time, the unit must be placed in a MODE in which the LCO does not apply. To achieve this status, the unit must be placed in at least MODE 3 within 6 hours and in MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

(continued)

BASES (continued)

SURVEILLANCE REQUIREMENTS	<u>SR 3.7.4.1</u> This SR verifies that the secondary specific activity is within the limits of the accident analysis. A gamma isotopic analysis of the secondary coolant, which determines DOSE EQUIVALENT I-131, confirms the validity of the safety analysis assumptions as to the source terms in post accident releases. It also serves to identify and trend any unusual isotopic concentrations that might indicate changes in reactor coolant activity or leakage. The 31 day Frequency is based on the detection of increasing trends of the level of DOSE EQUIVALENT I-131, and allows for appropriate action to be taken to maintain levels below the LCO limit.
REFERENCES	1. Chapter 15, "Accident Analyses."

B 3.7 PLANT SYSTEMS

B 3.7.5 Spent Fuel Pool Water Level

BASES

BACKGROUND

The minimum water level in the spent fuel pool meets the assumptions of iodine decontamination factors following a fuel handling accident. The specified water level shields and minimizes the general area dose when the storage racks are at their maximum capacity. The water also provides shielding during the movement of spent fuel, and a large capacity heat sink in the event the spent fuel pool cooling system is inoperable.

A general description of the spent fuel pool design is given in Section 9.1.2 (Ref. 1). A description of the Spent Fuel Pool Cooling System is given in Section 9.1.3 (Ref. 2). The assumptions of the fuel handling accident are given in Section 15.7.4 (Ref. 3).

APPLICABLE SAFETY ANALYSES

The minimum water level in the spent fuel pool meets the assumptions of the fuel handling accident described in Regulatory Guide 1.25 (Ref. 4). The design basis radiological consequences resulting from a postulated fuel handling accident are within the dose values provided in Section 15.7.4 (Ref. 3).

According to Reference 3 there is 23 ft of water between the damaged fuel bundle and the fuel pool surface during a fuel handling accident. In the case of a single bundle dropped and lying horizontally on top of the spent fuel racks, however, there may be < 23 ft of water above the top of the fuel bundle and the surface, indicated by the width of the bundle. This slight reduction in water depth does not adversely affect the margin of conservatism associated with the assumed pool scrubbing factor of 133 for elemental iodine.

In addition to mitigation of the effects of a fuel handling accident, the required minimum water level in the spent fuel pool provides a large capacity heat sink for spent fuel pool cooling in the event the spent fuel pool cooling system is inoperable.

The Spent Fuel Pool Water Level satisfies Criterion 2 of the NRC Policy Statement.

(continued)

BASES (continued)

LCO

The spent fuel pool water level is required to be ≥ 23 ft. over the top of irradiated fuel assemblies seated in the storage racks. The specified water level preserves the assumptions of the fuel handling accident analysis (Ref. 3) and loss of spent fuel pool cooling. As such, it is the minimum required for fuel storage and movement within the spent fuel pool.

APPLICABILITY

This LCO applies at all times since the loss of spent fuel pool cooling is not MODE dependent.

ACTIONS

A.1

Required Action A.1 has been modified by a Note which states that LCO 3.0.3 does not apply.

When the initial conditions for prevention of an accident cannot be met, steps should be taken to preclude the accident from occurring. When the spent fuel pool water level is lower than the required level, the movement of irradiated fuel assemblies shall be suspended. This action effectively precludes the occurrence of a fuel handling accident. This does not preclude movement of a fuel assembly to a safe position.

If moving irradiated fuel assemblies while in MODE 4, 5, or 6, LCO 3.0.3 would not specify any action. If moving irradiated fuel assemblies while in MODES 1, 2 and 3, the fuel movement is independent of reactor operations. Therefore, inability to suspend movement of irradiated fuel assemblies is not a sufficient reason to require a reactor shutdown.

A.2

If the water level in the spent fuel pool is < 23 ft, the heat capacity of the spent fuel pool will be less than that assumed in the event of a loss of spent fuel pool cooling. In this case, action must be initiated within 1 hour to restore the water level in the spent fuel pool to ≥ 23 ft above the top of the irradiated fuel assemblies. Initiation of this action requires that the action be continued until a water level of ≥ 23 ft is attained.

(continued)

BASES

ACTIONS	A.2 (continued) The Completion Time of 1 hour assures prompt action to compensate for a degraded condition.
SURVEILLANCE REQUIREMENTS	SR 3.7.5.1 This SR verifies sufficient spent fuel pool water is available in the event of a fuel handling accident or loss of spent fuel pool cooling. The water level in the spent fuel pool must be checked periodically. The 7 day Frequency is appropriate because the volume in the pool is normally stable. Water level changes are controlled by plant procedures and are acceptable based on operating experience. During refueling operations, the level in the spent fuel pool is in equilibrium with the refueling canal, and the level in the refueling canal is checked daily in accordance with SR 3.9.4.1.
REFERENCES	1. Section 9.1.2, "Spent Fuel Storage." 2. Section 9.1.3, "Spent Fuel Pool Cooling System." 3. Section 15.7.4, "Fuel Handling Accident." 4. Regulatory Guide 1.25 Rev. 0, "Assumptions Used for Evaluating the Potential Radiological Consequences of a Fuel Handling Accident in the Fuel Handling and Storage Facility for Boiling and Pressurized Water Reactors."

B 3.7 PLANT SYSTEMS

B 3.7.6 Main Control Room Emergency Habitability System

BASES

BACKGROUND

The Main Control Room Habitability System (VES) provides a protected environment from which operators can control the plant following an uncontrolled release of radioactivity. The system is designed to operate following a Design Basis Accident (DBA) which requires protection from the release of radioactivity. In these events, the Nuclear Island Non-Radioactive Ventilation System (VBS) would continue to function if AC power is available. If AC power is lost or a High-2 main control room (MCR) radiation signal is received, the VES is actuated. The major functions of the VES are: 1) to provide forced ventilation to deliver an adequate supply of breathable air for the MCR occupants; 2) to provide forced ventilation to maintain the MCR at a 1/8 inch water gauge positive pressure with respect to the surrounding areas; and 3) to limit the temperature increase of the MCR equipment and facilities that must remain functional during an accident, via the heat absorption of passive heat sinks.

The VES consists of compressed air storage tanks, two air delivery flow paths, associated valves, piping, and instrumentation. The tanks contain enough breathable air to supply the required air flow to the MCR for at least 72 hours. The VES system is designed to maintain CO_2 concentration less than 0.5% for up to 11 MCR occupants.

Sufficient thermal mass exists in the surrounding concrete structure (including walls, ceiling and floors) to absorb the heat generated inside the MCR, which is initially at or below 75°F. Heat sources inside the MCR include operator workstations, emergency lighting and occupants. Sufficient insulation is provided surrounding the MCR pressure boundary to preserve the minimum required thermal capacity of the heat sink. The insulation also limits the heat gain from the adjoining areas following the loss of VBS cooling.

In the unlikely event that power to the VBS is unavailable for more than 72 hours, MCR envelope habitability is maintained by operating one of the two MCR ancillary fans to supply outside air to the MCR envelope.

(continued)

BASES

BACKGROUND (continued)	The compressed air storage tanks are initially pressurized to 3400 psig. During operation of the VES, a self contained pressure regulating valve maintains a constant downstream pressure regardless of the upstream pressure. An orifice downstream of the regulating valve is used to control the air flow rate into the MCR. The MCR is maintained at a 1/8 inch water gauge positive pressure to minimize the infiltration of airborne contaminants from the surrounding areas.
APPLICABLE SAFETY ANALYSES	The compressed air storage tanks are sized such that the set of tanks has a combined capacity that provides at least 72 hours of VES operation. Operation of the VES is automatically initiated by either of two safety related signals: 1) undervoltage to Class 1E battery charger, or 2) high-2 particulate or iodine radioactivity. In the event of a loss of all AC power, the VES functions to provide ventilation, pressurization, and cooling of the MCR pressure boundary. In the event of a high level of gaseous radioactivity outside of the MCR, the VBS continues to operate to provide pressurization and filtration functions. The MCR air supply downstream of the filtration units is monitored by a safety related radiation detector. Upon an undervoltage to Class 1E battery charger or high-2 particulate or iodine radioactivity setpoint, a safety related signal is generated to isolate the MCR from the VBS and to initiate air flow from the VES storage tanks. Isolation of the VBS consists of closing safety related valves in the supply and exhaust ducts that penetrate the MCR pressure boundary. VES air flow is initiated by a safety related signal which opens the isolation valves in the VES supply lines. The VES functions to mitigate a DBA or transient that either assumes the failure of or challenges the integrity of the fission product barrier. The VES satisfies the requirements of Criterion 3 of the NRC Policy Statement.

(continued)

BASES (continued)

LCO

The VES limits the MCR temperature rise and maintains the MCR at a positive pressure relative to the surrounding environment.

Two air delivery flow paths are required to be OPERABLE to ensure that at least one is available, assuming a single failure.

The VES is considered OPERABLE when the individual components necessary to deliver a supply of breathable air to the MCR are OPERABLE. This includes components listed in SR 3.7.6.2 through 3.7.6.8. In addition, the MCR pressure boundary must be maintained, including the integrity of the walls, floors, ceilings, electrical and mechanical penetrations, and access doors.

APPLICABILITY

The VES is required to be OPERABLE in MODES 1, 2, 3, and 4 and during movement of irradiated fuel because of the potential for a fission product release following a DBA. The VES is not required to be OPERABLE in MODES 5 and 6 when irradiated fuel is not being moved because accidents resulting in fission product release are not postulated.

The VES is required to be OPERABLE during CORE ALTERATIONS, to be consistent with Standard Technical Specifications, NUREG-1431, LCO 3.7.10, Control Room Emergency Filtration System requirements.

ACTIONS

A.1

When a VES valve or damper is inoperable, action is required to restore the component to OPERABLE status. A Completion Time of 7 days is permitted to restore the valve or damper to OPERABLE status before action must be taken to reduce power. The Completion Time of 7 days is based on engineering judgment, considering the low probability of an accident that would result in a significant radiation release from the fuel, the low probability of not containing the radiation, and that the remaining components can provide the required capability.

(continued)

BASES

ACTIONS (continued)

B.1

When the main control room air temperature is outside the acceptable range during VBS operation, action is required to restore it to an acceptable range. A Completion Time of 24 hours is permitted based upon the availability of temperature indication in the MCR. It is judged to be a sufficient amount of time allotted to correct the deficiency in the nonsafety ventilation system before shutting down.

C.1

If the MCR pressure boundary is damaged or otherwise degraded, action is required to restore the integrity of the pressure boundary and restore it to OPERABLE status within 24 hours. A Completion Time of 24 hours is permitted based upon operating experience. It is judged to be a sufficient amount of time allotted to correct the deficiency in the pressure boundary.

D.1 and D.2

In MODE 1, 2, 3, or 4 if Conditions A, B, or C cannot be restored to OPERABLE status within the required Completion Time, the plant must be placed in a MODE that minimizes accident risk. This is done by entering MODE 3 within 6 hours and MODE 5 within 36 hours.

E.1 and E.2

During movement of irradiated fuel assemblies or CORE ALTERATIONS, if the Required Action A.1, B.1, or C.1 cannot be completed within the required Completion Time, the movement of fuel and CORE ALTERATIONS must be suspended. Performance of Required Actions E.1 and E.2 shall not preclude completion of actions to establish a safe condition.

F.1, F.2, and F.3

If the VES is inoperable in MODE 1, 2, 3, or 4, the VES may not be capable of performing the intended function, and the plant must be brought to MODE 4, where the probability and consequences of an event are minimized, and the VES must be

(continued)

BASES

ACTIONS

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

restored to OPERABLE status within 36 hours. This is accomplished by placing the plant in MODE 3 within 6 hours and in MODE 4 within 12 hours.

G.1 and G.2

During movement of irradiated fuel assemblies or CORE ALTERATIONS with the VES inoperable, the Required Action is to immediately suspend activities that present a potential for releasing radioactivity that might enter the MCR. This places the plant in a condition that minimizes risk. This does not preclude the movement of fuel to a safe position.

SURVEILLANCE REQUIREMENTS

SR 3.7.6.1

The MCR air temperature is checked at a frequency of 24 hours to verify that the VBS is performing as required to maintain the initial condition temperature assumed in the safety analysis, and to ensure that the MCR temperature will not exceed the required conditions after loss of VBS cooling. The surveillance limit of 75°F is the initial heat sink temperature assumed in the VES thermal analysis. The 24 hour Frequency is acceptable based on the availability of temperature indication in the MCR.

SR 3.7.6.2

Verification every 24 hours that compressed air storage tanks are pressurized to [$\geq$ 3400 psig] is sufficient to ensure that there will be an adequate supply of breathable air to maintain MCR habitability for a period of 72 hours. The Frequency of 24 hours is based on the availability of pressure indication in the MCR.

SR 3.7.6.3

VES air delivery isolation valves are required to be verified as OPERABLE. The Frequency required is in accordance with the Inservice Testing Program.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.7.6.4

VES air header isolation valves are required to be verified open at 31 day intervals. This SR is designed to ensure that the pathways for supplying breathable air to the MCR are available should loss of VBS occur. These valves should be closed only during required testing or maintenance of downstream components, or to preclude complete depressurization of the system should the VES isolation valves in the air delivery line open inadvertently or begin to leak.

SR 3.7.6.5

Verification that the air quality of the air storage tanks meets the requirements of Appendix C, Table C-1 of ASHRAE Standard 62 is required every 92 days. If air has not been added to the air storage tanks since the previous verification, verification may be accomplished by confirmation of the acceptability of the previous surveillance results along with examination of the documented record of air makeup. The purpose of ASHRAE Standard 62 states: "This standard specifies minimum ventilation rates and indoor air quality that will be acceptable to human occupants and are intended to minimize the potential for adverse health effects." Verification of the initial air quality (in combination with the other surveillances) ensures that breathable air is available for 11 MCR occupants for at least 72 hours.

SR 3.7.6.6

Verification that all VBS isolation valves are operable and will actuate upon demand is required every 24 months to ensure that the MCR can be isolated upon loss of VBS operation.

SR 3.7.6.7

Verification that each VES pressure relief isolation valve within the MCR pressure boundary is OPERABLE is required in accordance with the Inservice Testing Program. The SR is used in combination with SR 3.7.6.7 to ensure that adequate vent area is available to mitigate MCR overpressurization.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.7.6.8

Verification that the VES pressure relief damper is OPERABLE is required at 24 month intervals. The SR is used in combination with SR 3.7.6.6 to ensure that adequate vent area is available to mitigate MCR overpressurization.

SR 3.7.6.9

Verification of the operability of the self-contained pressure regulating valve in each VES air delivery flow path is required in accordance with the Inservice Testing Program. This is done to ensure that a sufficient supply of air is provided as required, and that uncontrolled air flow into the MCR will not occur.

SR 3.7.6.10

Per Reference 1, a functional test is required to establish that one VES air delivery flow path, using the safety related compressed air storage tanks, pressurizes the MCR envelope to at least a positive 1/8 inch water gauge pressure relative to the surrounding spaces at the required air addition flow rate of 65 ± 5 scfm (Reference 3). The test need not last 72 hours, only long enough to demonstrate the ability to achieve the required differential pressure. The MCR envelope leakage rate must be within the design capacity of the VES to pressurize the MCR for 72 hours. One air delivery flow path is tested on an alternating basis. The system performance test demonstrates that the MCR pressurization assumed in dose analysis is maintained.

REFERENCES

1. Section 6.4, "Main Control Room Habitability Systems."

2. Section 9.4.1, "Nuclear Island Non-Radioactive Ventilation System."

3. SECY-95-132, "Policy and Technical Issues Associated With The Regulatory Treatment of Non-Safety Systems (RTNSS) In Passive Plant Designs (SECY-94-084)," May 22, 1995.

B 3.7 PLANT SYSTEMS

B 3.7.7 Startup Feedwater Isolation and Control Valves

BASES

BACKGROUND

The startup feedwater system supplies feedwater to the steam generators during plant startup, hot standby and cooldown, and in the event of main feedwater unavailability.

The startup feedwater system serves no safety related function and has no safety related design basis, except to isolate feedwater in the event of a feedwater, steam line break, a steam generator tube rupture or other secondary side event.

The startup feedwater system consists of a flow path to each of the steam generators. Each flow path consists of two series startup feedwater valves to provide feedwater control for low feedwater demand conditions. Feedwater can be supplied to the startup feedwater line via either the main or startup feedwater pumps. The feedwater is delivered directly to the SG independent of the main feedwater line. Each startup feedwater line contains one control valve and one isolation valve (Ref. 1).

APPLICABLE SAFETY ANALYSES

The basis for the requirement to isolate the startup feedwater system is established by the analysis for large Steam Line Break (SLB) inside containment. It is also based on the analysis for a large Feedline Break (FLB) and a steam generator tube rupture.

Failure to isolate the startup feedwater system following a SLB or FLB can lead to additional mass and energy being delivered to the steam generators, resulting in excessive cooldown and additional mass and energy release in containment. Failure to isolate the startup feedwater following a steam generator tube rupture may result in overfilling the steam generator.

Low T_{cold} or high steam generator level signals close the startup feedwater control and isolation valves and trips the startup feedwater pumps.

The startup feedwater isolation and control valves are components which actuate to mitigate a Design Basis Accident, and as such meet Criterion 3 of the NRC Policy Statement.

(continued)

BASES (continued)

LCO

This LCO ensures that the startup feedwater isolation and control valves will actuate on command, following a SLB, FLB or SGTR, and isolate startup feedwater flow to the steam generators.

The startup feedwater isolation and control valves are considered OPERABLE when they automatically close on an isolation actuation signal, and their isolation times are within the required limits.

APPLICABILITY

The startup feedwater isolation and control valves must be OPERABLE whenever there is significant mass and energy in the Reactor Coolant System and the steam generators. In MODES 1, 2, 3 and 4, the startup feedwater isolation and control valves are required to be OPERABLE in order to limit the amount of mass and energy that could be added to containment in the event of a SLB or FLB and prevent steam generator overfill in the event of an SGTR. When the valves are closed, they are already performing their safety function.

In MODES 5 and 6, the energy in the steam generators is low, and isolation of the startup feedwater system is not required.

ACTIONS

The ACTIONS are modified by a Note allowing flow paths to be unisolated intermittently under administrative controls. These controls consist of stationing a dedicated operator at the valve controls, who is in continuous communication with the control room. In this way, the flow paths can be rapidly isolated.

A.1 and A.2

With only one isolation or control valve OPERABLE in one or more flow paths, there is no redundant capability to isolate the flow paths. In this case, both an isolation and a control valve in each flow path must be restored to OPERABLE status with 72 hours, or the flow path must be isolated. A Completion Time of 72 hours is acceptable since, with one valve in a flow path inoperable, there is a second valve available in the flow path to isolate the line.

(continued)

BASES

ACTIONS

A.1 and A.2 (continued)

If the inoperable valve in the flow path can not be restored to OPERABLE status, then the flow path must be isolated within a Completion Time of 72 hours. The method of isolation must include the use of at least one isolation barrier that cannot be adversely affected by a single active failure.

For flow paths isolated in accordance with Required Action A.2.1, the affected flow paths must be verified to be isolated on a periodic basis. This is necessary to ensure that flow paths required to be isolated following an accident will be in the isolation position should an event occur. This Required Action does not require any testing or device manipulation. Rather, it involves verification, through a system walkdown, that the isolation devices are in the correct position. The Completion Time of "once per 7 days" is appropriate considering the fact that the devices are operated under administrative controls, valve status indications in the main control room and the probability of their misalignment is low.

B.1

With both the isolation and control valves inoperable in one flow path, the affected flow path must be restored to OPERABLE status or isolated within a Completion Time of 8 hours. The method of isolation must include the use of at least one isolation barrier that cannot be adversely affected by a single active failure.

C.1, C.2, and C.3

If the isolation and control valves cannot be restored to OPERABLE status, closed, or isolated within the associated Completion Times, the unit must be placed in a MODE in which the LCO does not apply. To achieve this status, the plant must be placed in least MODE 3 within 6 hours, and in MODE 4 with RCS cooling provided by the normal residual heat removal system within 24 hours, and the affected flow path isolated within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging plant systems.

(continued)

BASES (continued)

SURVEILLANCE REQUIREMENTS	SR 3.7.7.1 This surveillance requires verification in accordance with the Inservice Testing Program to assure that both startup feedwater isolation and control valves are OPERABLE. The Surveillance Frequency is provided in the Inservice Testing Program.
REFERENCES	1. Section 10.4.9, "Startup Feedwater System."

B 3.7 PLANT SYSTEMS

B 3.7.8 Main Steam Line Leakage

BASES

BACKGROUND

A limit on leakage from the main steam line inside containment is required to limit system operation in the presence of excessive leakage. Leakage is limited to an amount which would not compromise safety consistent with the Leak-Before-Break (LBB) analysis discussed in Chapter 3 (Ref. 1). This leakage limit ensures appropriate action can be taken before the integrity of the lines is impaired.

LBB is an argument which allows elimination of design for dynamic load effects of postulated pipe breaks. The fundamental premise of LBB is that the materials used in nuclear plant piping are strong enough that even a large throughwall crack leaking well in excess of rates detectable by present leak detection systems would remain stable, and would not result in a double-ended guillotine break under maximum loading conditions. The benefit of LBB is the elimination of pipe whip restraints, jet impingement effects, subcompartment pressurization, and internal system blowdown loads.

As described in Section 3.6 (Ref. 1), LBB has been applied to the main steam line pipe runs inside containment. Hence, the potential safety significance of secondary side leaks inside containment requires detection and monitoring of leakage inside containment. This LCO protects the main steam lines inside containment against degradation, and helps assure that serious leaks will not develop. The consequences of violating this LCO include the possibility of further degradation of the main steam lines, which may lead to pipe break.

APPLICABLE SAFETY ANALYSES

The safety significance of plant leakage inside containment varies depending on its source, rate, and duration. Therefore, detection and monitoring of plant leakage inside containment are necessary. This is accomplished via the instrumentation required by LCO 3.4.10, "RCS Leakage Detection Instrumentation," and the RCS water inventory

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)	balance (SR 3.4.8.1). Subtracting RCS leakage as well as any other identified non-RCS leakage into the containment area from the total plant leakage inside containment provides qualitative information to the operators regarding possible main steam line leakage. This allows the operators to take corrective action should leakage occur which is detrimental to the safety of the facility and/or the public. Although the main steam line leakage limit is not required by the NRC Policy Statement criteria, this specification has been included in Technical Specifications in accordance with NRC direction (Ref. 2).
LCO	Main steam line leakage is defined as leakage inside containment in any portion of the two (2) 28" I.D. main steam line pipe walls. Up to 0.5 gpm of leakage is allowable because it is below the leak rate for LBB analyzed cases of a main steam line crack twice as long as a crack leaking at ten (10) times the detectable leak rate under normal operating load conditions. Violation of this LCO could result in continued degradation of the main steam line.
APPLICABILITY	Because of elevated main steam system temperatures and pressures, the potential for main steam line leakage is greatest in MODES 1, 2, 3, and 4. In MODES 5 and 6, a main steam line leakage limit is not provided because the main steam system pressure is far lower, resulting in lower stresses and a reduced potential for leakage. In addition, the steam generators are not the primary method of RCS heat removal in MODES 5 and 6.

(continued)

BASES (continued)

ACTIONS

A.1 and A.2

With main steam line leakage in excess of the LCO limit, the unit must be brought to lower pressure conditions to reduce the severity of the leakage and its potential consequences. The reactor must be placed in MODE 3 with 8 hours and MODE 5 within 48 hours. This action reduces the main steam line pressure and leakage, and also reduces the factors which tend to degrade the main steam lines. The Completion Time of 6 hours to reach MODE 3 from full power without challenging plant systems is reasonable based on operating experience. Similarly, the Completion Time of 36 hours to reach MODE 5 without challenging plant systems is also reasonable based on operating experience. In MODE 5, the pressure stresses acting on the main steam line are much lower, and further deterioration of the main steam line is less likely.

SURVEILLANCE REQUIREMENTS

SR 3.7.8.1

Verifying that main steam line leakage is within the LCO limit assures the integrity of those lines inside containment is maintained. An early warning of main steam line leakage is provided by the automatic system which monitor the containment sump level. Main steam line leakage would appear as unidentified leakage inside containment via this system, and can only be positively identified by inspection. However, by performance of an RCS water inventory balance (SR 3.4.8.1) and evaluation of the cooling and chilled water systems inside containment, determination of whether the main steam line is a potential source of unidentified leakage inside containment is possible.

REFERENCES

1. Section 3.6, "Protection Against the Dynamic Effects Associated with the Postulated Rupture of Piping."

2. NRC letter, Diane T. Jackson to Westinghouse (Nicholas J. Liparulo), dated September 5, 1996, "Staff Update to Draft Safety Evaluation Report (DSER) Open Items (OIs) Regarding the Westinghouse AP600 Advanced Reactor Design," Open Item #365.

B 3.7 PLANT SYSTEMS

B 3.7.9 Fuel Storage Pool Makeup Water Sources

BASES

BACKGROUND

The spent fuel storage pool is normally cooled by the nonsafety spent fuel pool cooling system. In the event the normal cooling system is unavailable, the spent fuel storage pool can be cooled by the normal residual heat removal system. Alternatively, the spent fuel storage pool contains sufficient water inventory for decay heat removal by boiling. To support extended periods of loss of normal pool cooling, makeup water is required to provide additional cooling by boiling. Several nonsafety makeup sources are available, if AC power is available. Additionally, gravity fed makeup is available from the nonsafety ground level containment cooling ancillary water storage tank.

Two safety-related, gravity fed sources of makeup water are provided to the spent fuel storage pool. These makeup water sources contain sufficient water to maintain spent fuel storage pool cooling for 7 days. The containment cooling system water storage tank provides makeup water following a full core off-load (decay heat > 2.77 MWt). The cask washdown pit provides makeup water following a 1/3 core refueling (decay heat $\geq$ 2.15 MWt and $\leq$ 2.77 MWt).

The containment cooling system water storage tank is isolated by two normally closed valves. The normally closed valves will be opened only to provide emergency makeup to the spent fuel storage pool. A downstream valve permits the operator to regulate addition of water to the spent fuel storage pool as required to maintain the cooling water inventory.

Once decay heat of the 1/3 core off-load is reduced to below 2.15 MWt, the spent fuel storage pool water inventory is sufficient, without makeup, to maintain spent fuel storage pool for 7 days. When the spent fuel storage pool decay heat load is reduced below 2.15 MWt (approximately 17 days), the cask washdown pit may be drained and returned to use for shipping cask cleaning operations.

(continued)

BASES

BACKGROUND (continued)	A general description of the fuel storage pool design is given in Section 9.1.2 (Ref. 1). A description of the Spent Fuel Pool Cooling and Cleanup System is given in Section 9.1.3 (Ref. 2).
APPLICABLE SAFETY ANALYSES	In the event the normal spent fuel storage pool cooling system is unavailable, the spent fuel cooling is provided by the heat capacity of the water in the pool. The worst case decay heat load (decay heat > 2.77 MWt) is produced by an emergency full core off-load following a refueling plus ten years of spent fuel. The spent fuel storage pool inventory provided by the water over the stored fuel and below the pump suction connection is capable of cooling the spent fuel storage pool without boiling for at least 4 hours, following a loss of normal spent fuel storage pool cooling. After boiling starts, makeup water may be required to replace water lost by boiling and is available, without offsite support, via connections from the two safety related sources. If the decay heat load is ≤ 2.77 MWt, the cask washdown pit contains sufficient water to assure spent fuel cooling for 7 days. If the decay heat load is > 2.77 MWt, the larger water inventory provided by containment cooling water tank may be required to assure spent fuel cooling for 7 days. The requirements of LCO 3.6.6, "Passive Containment Cooling System - Operating," are applicable in MODES 1, 2, 3, and 4 and LCO 3.6.7, "Passive Containment Cooling System - Shutdown," are applicable in MODES 5 and 6 with decay heat > 6.0 MWt. LCOs 3.6.6 and 3.6.7 require availability of the containment cooling water tank for containment heat removal. Below 6.0 MWt decay heat, containment air cooling is adequate. Since there are no design conditions which result in both reactor decay heat > 6 MWt and spent fuel storage pool decay heat > 2.77 MWt, the applicability for LCOs 3.6.6/3.6.7 and for LCO 3.7.9 are mutually exclusive. Since none of the Chapter 15 Design Basis Accident analyses assume availability of the containment cooling water tank or the cask washdown pit for spent fuel storage pool makeup, the fuel storage pool makeup water sources specification does not satisfy any of the NRC Policy Statement criteria. This LCO is included in accordance with NRC guidance provided in an NRC letter (Reference 3).

(continued)

BASES (continued)

LCO

The fuel storage pool makeup water sources, the cask washdown pit, and the containment cooling water tank are required to contain 13.75 ft. and 400,000 gallons of water, respectively. An OPERABLE flow path from the required makeup source assures spent fuel cooling for at least 7 days.

Note 1 specifies that either the cask washdown pit or the passive containment cooling water storage tank is required to be OPERABLE when the spent fuel storage pool decay heat ≥ 2.15 MWt and ≤ 2.77 MWt. Note 2 specifies that the passive containment cooling water storage tank source is required to be OPERABLE when the spent fuel storage pool decay heat is > 2.77 MWt, which is normal following a full core off load. The larger makeup source is necessary for the higher decay heat load. When a portion of the fuel is returned to the reactor vessel in preparation for startup, the pool decay heat is reduced to ≤ 2.77 MWt and makeup from the cask washdown pit is sufficient.

APPLICABILITY

This LCO applies during storage of fuel in the fuel storage pool with a calculated decay heat ≥ 2.15 MWt, which is normal for a period of time after refueling 1/3 of the core.

Approximately 17 days after a 1/3 core refueling, the decay heat load in the spent fuel storage pool is reduced to < 2.15 MWt and this LCO is no longer applicable. With decay heat < 2.15 MWt, the assumed spent fuel storage pool water inventory (i.e., level below the pump suction connection to the pool) provides for 7 days of cooling without makeup.

ACTIONS

A.1

Required Action A.1 is modified by a Note indicating that LCO 3.0.3 does not apply.

If the passive containment cooling water storage tank (with decay heat > 2.77 MWt) and/or the cask washdown pit (with decay heat ≥ 2.15 and ≤ 2.77 MWt) is inoperable, Action must be initiated immediately to restore the makeup source or its associated flow path to OPERABLE status.

(continued)

BASES

ACTIONS

A.1 (continued)

Additionally, in order to provide the maximum cooling capability, the spent fuel pool should be filled to its maximum level. Nonsafety related makeup sources can be used to fill the pool. This action is not specified in the specification, since the benefit of adding approximately 6 inches of water to the pool is less than a 5% improvement in cooling capability.

SURVEILLANCE REQUIREMENTS

SR 3.7.9.1

This SR verifies sufficient passive containment cooling system water storage tank volume is available in the event of a loss of spent fuel cooling. The volume specified (400,000 gallons) is less than the 531,000 gallon capacity of the tank and allows testing of the passive containment cooling system during refueling outages, while maintaining an adequate makeup water supply.

The 7 day Frequency is appropriate because the volume in the passive containment cooling system water storage tank is normally stable and water level changes are controlled by plant procedures.

SR 3.7.9.2

This SR verifies sufficient cask washdown pit water volume is available in the event of a loss of spent fuel cooling. The 13.75 ft. level specified provides makeup water for stored fuel with decay heat $\geq$ 2.15 and $\leq$ 2.77 MWt.

The 30 day Frequency is appropriate because the cask washdown pit has only one drain line which is isolated by series manual valves which are only operated in accordance with plant procedures, thus providing assurance that inadvertent level reduction is not likely.

SR 3.7.9.3

This SR requires verification of the OPERABILITY of the manual makeup water source isolation valves in accordance

(continued)

BASES

SURVEILLANCE REQUIREMENTS	SR 3.7.9.3 (continued) with the requirements and Frequency specified in the Inservice Testing Program. Manual valves PCS-PL-V009, PCS-PL-V045, PCS-PL-V049, PCS-PL-V051, isolate the makeup flow path from the passive containment cooling system water storage tank. Manual valves SFS-PL-V066 and SFS-PL-V068 isolate the makeup flow path from the cask washdown pit.
REFERENCES	1. Section 9.1.2, "Spent Fuel Storage." 2. Section 9.1.3, "Spent Fuel Pool Cooling System." 3. NRC letter, William C. Huffman to Westinghouse Electric Corporation, "Summary of Telephone Conference with Westinghouse to Discuss Proposed Design Changes to the AP600 Main Control Room Habitability System," dated September 11, 1997.

B 3.7 PLANT SYSTEMS

B 3.7.10 Steam Generator Isolation Valves

BASES

BACKGROUND

The steam generator isolation valves consist of the power operated relief valve (PORV) block valves (SGS-PL-V027A & B), PORVs (SGS-PL-V233A & B), and blowdown isolation valves (SGS-PL-V074A & B and SGS-PL-V075A & B). The PORV flow paths must be isolated following a Steam Generator Tube Rupture (SGTR) to minimize radiological releases. The blowdown flow path must be isolated following Loss of Feedwater and Feedwater Line Break events to retain the steam generator water inventory for Reactor Coolant System (RCS) heat removal.

A PORV is installed in a 6 inch branch line off of the 32 inch main steam line piping from each steam generator, to provide for controlled removal of reactor decay heat during normal reactor cooldown when the main steam isolation valves are closed or the turbine bypass system is not available. A normally-open block valve is provided in each PORV line to provide backup isolation capability. Both the PORV and the block valve receive a Protection and Safety Monitoring System (PMS) isolation signal on low steam line pressure. The block valve is also a containment isolation valve.

The 4 inch blowdown line from each steam generator is provided with two series isolation valves, both located outside, but close to, containment. The blowdown valves receive a PMS isolation signal on low SG level and on PRHR actuation. The first blowdown isolation valve outside of containment is also a containment isolation valve.

The steam generator PORVs and the blowdown isolation valves fail closed on loss of control or actuation power. The steam generator PORV block valves fail as-is on loss of control or actuation power. The steam generator isolation valves may also be actuated manually.

Descriptions of the PORVs and SG blowdown isolation are found in Section 10.3.2.2.3 and Section 10.4.8 (Refs. 1 & 2).

(continued)

BASES (continued)

APPLICABLE SAFETY ANALYSES

The PORV flow paths must be isolated following an SGTR to minimize radiological releases from the ruptured steam generator into the atmosphere. The PORV flow path is assumed to open due to high secondary side pressure, during the SGTR. Dose analyses take credit for subsequent isolation of the PORV flow path by the PORV and/or the block valve which receive a close signal on low steam line pressure.

The blowdown flow path on each SG must be isolated following Loss of Feedwater and Feedwater Line Break events to retain the steam generator water inventory for use in Reactor Coolant System (RCS) heat removal via the SGs. RCS heat removal for these events is, primarily, provided by the Passive Residual Heat Removal Heat Exchanger (PRHR HX); however, the SG heat removal is assumed. The SG blowdown isolation valves receive an isolation signal on low SG level or PRHR actuation. These events take credit for steam generator heat removal using the water inventory retained after blowdown isolation. If the 4 inch blowdown line were not isolated, much of the inventory would drain from the SG rather than cool the RCS.

The steam generator isolation valves satisfy Criterion 3 of the NRC Policy Statement.

LCO

This LCO requires that the steam generator isolation valves consisting of the PORV, PORV block valve, and blowdown isolation valves on each steam generator to be OPERABLE. These isolation valves are considered OPERABLE when the valves are capable of closing on a PMS actuation signal.

This LCO provides assurance that the PORV and PORV block valve will perform their design safety function to mitigate the consequences of an SGTR that could result in offsite exposures.

Additionally, this LCO provides assurance that the steam generator blowdown isolation valves will perform their design safety function to mitigate the consequences of Loss of Feedwater and Feedwater Line Break events by retaining the steam generator water inventory for Reactor Coolant System (RCS) heat removal.

(continued)

BASES (continued)

APPLICABILITY

The steam generator isolation valves must be OPERABLE in MODES 1, 2, and 3, and in MODE 4 with the RCS cooling not being provided by the Normal Residual Heat Removal System (RNS).

In MODE 4 with the RCS cooling being provided by the RNS and in MODES 5 and 6, the steam generators are not needed for RCS cooling and the potential for an SGTR or Loss of Feedwater and Feedwater Line Break events is minimized due to the reduced mass and energy in the RCS and steam generators.

ACTIONS

The ACTIONS are modified by a Note allowing the blowdown isolation flow paths to be unisolated intermittently under administrative controls. These administrative controls consist of stationing a dedicated operator at the valve controls, who is in continuous communication with the control room. In this way, the flow path can be rapidly isolated when a need for blowdown isolation is indicated.

The second Note allows separate Condition entry for each steam generator isolation flow path. This is acceptable, since the Required Actions for each Condition provide appropriate compensatory actions for each inoperable flow path.

<u>A.1</u>

With one valve in one or more PORV flow paths inoperable, action must be taken to isolate the flow path with a closed and deactivated valve. The valve must be deactivated to assure that the flow path will not be opened by a high pressure signal during the course of an SGTR event. This action places the flow path in a condition which assures the safety function is performed. A Completion Time of 72 hours is based on the availability of one OPERABLE PORV flow path isolation valve which is fully capable of performing the required isolation function.

(continued)

BASES

ACTIONS (continued)

B.1 and B.2

With one valve in one or more blowdown flow paths inoperable, action must be taken to isolate the flow path with a closed valve. This action places the flow path in a condition which assures the safety function is performed. A Completion Time of 72 hours to isolate the flow path is based on the availability of one OPERABLE blowdown flow path isolation valve which is fully capable of performing the required isolation function.

Since the blowdown isolation valve is not deactivated, periodic verification is required to assure that the flow path remains isolated. This is necessary to ensure that the assumptions in the safety analysis remain valid. The 7 day Completion Time is reasonable, based on engineering judgment, in view of status indications available in the control room, and other administrative controls, to ensure that the valve remains in the closed position.

C.1

With both valves in one or more PORV flow paths inoperable, action must be taken to isolate the flow path with a closed and deactivated valve. The valve must be deactivated to assure that the flow path will not be opened by a high pressure signal during the course of an SGTR event. This action places the flow path in a condition which assures the safety function is performed. The 8 hour Completion Time is reasonable, considering the low probability of an accident occurring during this time period that would require a closure of the SG isolation valves.

D.1 and D.2

With two valves in one or more blowdown flow paths inoperable, action must be taken to isolate the flow path with a closed valve. This action places the flow path in a condition which assures the safety function is performed. The 8 hour Completion Time is reasonable, considering the low probability of an accident occurring during this time period that would require a closure of the SG isolation valves.

(continued)

BASES

ACTIONS	D.1 and D.2 (continued) Since the blowdown isolation valve is not deactivated, periodic verification is required to assure that the flow path remains isolated. This is necessary to ensure that the assumptions in the safety analysis remain valid. The 7 day Completion Time is reasonable, based on engineering judgment, in view of status indications available in the control room, and other administrative controls, to ensure that the valve remains in the closed position. E.1 and E.2 If the SG isolation valves cannot be restored to OPERABLE status or are not closed within the associated Completion Time, the unit must be placed in a MODE in which the LCO does not apply. To achieve this status, the unit must be placed at least in MODE 3 within 6 hours, and in MODE 4 with the RCS cooling provided by the RNS within 24 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions in an orderly manner and without challenging unit systems.
SURVEILLANCE REQUIREMENTS	SR 3.7.10.1 The function of the SG isolation valves (PORV block valves (SGS-PL-V027A & B), PORVs (SGS-PL-V233A & B) and blowdown isolation valves (SGS-PL-V074A & B and SGS-PL-V075A & B)) is to isolate the steam generators in the event of SGTR, Loss of Feedwater or Feedwater Line Break. Stroking the valves closed demonstrates their capability to perform the isolation function. The Frequency for this SR is in accordance with the Inservice Testing Program.
REFERENCES	1. Section 10.3.2.2.3, "Power-Operated Atmospheric Relief Valves." 2. Section 10.4.8, "Steam Generator Blowdown System."

B 3.8 ELECTRICAL POWER SYSTEMS

B 3.8.1 DC Sources – Operating

BASES

BACKGROUND

The Class 1E DC and UPS System (IDS) provides electrical power for safety related and vital control instrumentation loads, including monitoring and main control room emergency lighting. It also provides power for safe shutdown when all the onsite and offsite AC power sources are lost and cannot be recovered for 72 hours. As required by 10 CFR 50, Appendix A, GDC 17 (Ref. 1), the Class 1E DC electrical power system is designed to have sufficient independence, redundancy, and testability to perform its safety functions, assuming a single failure. The Class 1E DC electrical power system also conforms to the requirements of Regulatory Guide 1.6 (Ref. 2) and IEEE-308 (Ref. 3).

The 125 VDC electrical power system consists of four independent safety related Class 1E DC electrical power subsystems (Division A, B, C, and D). Divisions A and D each consist of one 24 hour battery bank, one battery charger, and the associated control equipment and interconnecting cable. Divisions B and C each consist of two battery banks (one 24 hour and one 72 hour), two battery chargers, and the associated control equipment and interconnecting cabling. The loads on the battery banks (including those on the associated inverters) are grouped according to their role in response to a Design Basis Accident (DBA). Loads which are a one time or limited duration load (engineered safeguards features (ESF) actuation cabinets and reactor trip function) required within the first 24 hours following an accident are connected to the "24 hour" battery bank. Loads which are continuous or required beyond the first 24 hours following an accident (emergency lighting, post accident monitoring, and Qualified Data Processing System) are connected to the "72 hour" battery bank. There are a total of six battery banks. A battery bank consists of two batteries connected in parallel. Each battery consist of 60 cells connected in series. Divisions A and D each have one 4800 ampere hour battery bank and Divisions B and C each have two 4800 ampere hour battery banks.

(continued)

BASES

BACKGROUND (continued)

Additionally, there is one installed spare battery bank and one installed spare battery charger, which provide backup service in the event that one of the battery banks and/or one of the preferred battery chargers is out of service. The spare battery bank and charger are Class 1E and have the same rating as the primary components. If the spare battery bank with the charger is substituted for one of the preferred battery banks or chargers, then the requirements of independence and redundancy between subsystems are maintained and the division is OPERABLE.

During normal operation, the 125 VDC load is powered from the battery chargers with the batteries floating on the system. In case of loss of normal power to the battery charger, the DC load is automatically powered from the station batteries.

Each battery bank provides power to an inverter, which in turn powers an AC vital bus. The AC vital bus loads are connected to inverters according to the battery bank type, 24 hour or 72 hour.

The Class 1E DC power distribution system is described in more detail in Bases for LCO 3.8.5, "Distribution System - Operating," and LCO 3.8.6, "Distribution System - Shutdown."

Each battery has adequate storage capacity to carry the required load for the required duration as discussed in Reference 4.

Each 125 VDC battery bank, including the spare battery bank, is separately housed in a ventilated room apart from its charger and distribution centers. Each subsystem is located in an area separated physically and electrically from the other subsystems to ensure that a single failure in one subsystem does not cause a failure in a separate subsystem. There is no sharing between separate Class 1E subsystems such as batteries, battery chargers, or distribution panels.

The batteries for each Class 1E electrical power subsystem are based on 125% of required capacity. The voltage limit is 2.13 V per cell, which corresponds to a total minimum voltage output of 128 V per battery discussed in Reference 4. The criteria for sizing large lead storage batteries are defined in IEEE-485 (Ref. 5).

Each electrical power subsystem has ample power output capacity for the steady state operation of connected loads

(continued)

BASES

BACKGROUND (continued)	required during normal operation, while at the same time maintaining its battery bank fully charged. Each battery charger has sufficient capacity to restore the battery bank from the design minimum charge to its fully charged state within 24 hours while supplying normal steady state loads (Ref. 4).
APPLICABLE SAFETY ANALYSES	The initial conditions of DBA and transient analyses in the Chapter 6 (Ref. 6) and Chapter 15, (Ref. 7), assume that engineered safety features are OPERABLE. The Class 1E DC electrical power system provides 125 volts power for safety related and vital control instrumentation loads including monitoring and main control room emergency lighting during all MODES of operation. It also provides power for safe shutdown when all the onsite and offsite AC power sources are lost. The OPERABILITY of the Class 1E DC sources is consistent with the initial assumptions of the accident analyses. This includes maintaining at least three of the four divisions of DC sources OPERABLE during accident conditions in the event of: a. An assumed loss of all offsite and onsite AC power sources; and b. A worst case single failure. The DC Sources satisfy Criterion 3 of the NRC Policy Statement.
LCO	Class 1E DC electrical power subsystems are required to be OPERABLE to ensure the availability of the required power to shut down the reactor and maintain it in a safe condition after an anticipated operational occurrence (AOO) or a postulated DBA. Loss of Class 1E DC electrical power from one division does not prevent the minimum safety function from being performed (Ref. 4). An OPERABLE Class 1E DC electrical power subsystem requires all required batteries and respective chargers to be operating and connected to the associated DC bus(es). The spare battery and/or charger may be used by one subsystem for OPERABILITY.

(continued)

BASES (continued)

APPLICABILITY

The Class 1E DC electrical power sources are required to be OPERABLE in MODES 1, 2, 3, and 4 to ensure safe unit operation and to ensure that:

a. Acceptable fuel design limits and reactor coolant pressure boundary limits are not exceeded as a result of AOOs or abnormal transients; and

b. Adequate core cooling is provided, and containment integrity and other vital functions are maintained in the event of a postulated DBA.

Class 1E DC electrical power requirements for MODES 5 and 6 are addressed in the Bases for LCO 3.8.2, "DC Sources – Shutdown."

ACTIONS

A.1

If one of the Class 1E DC electrical power subsystems is inoperable, the remaining Class 1E DC electrical power subsystems have the capacity to support a safe shutdown and to mitigate all design basis accidents, based on conservative analysis.

Because of the passive system design and the use of fail-safe components, the remaining Class 1E DC electrical power subsystems have the capacity to support a safe shutdown and to mitigate most DBAs following a subsequent worst case single failure. The 6 hour Completion Time is reasonable based on engineering judgement balancing the risks of operation without one DC subsystem against the risks of a forced shutdown. Additionally, the Completion Time reflects a reasonable time to assess plant status; attempt to repair or replace, thus avoiding an unnecessary shutdown; and, if necessary, prepare and effect an orderly and safe shutdown.

The 6 hour Completion Time is also consistent with the time specified for restoration of one (of four) Engineered Safety Features Actuation Cabinet (ESFAC) or Protection Logic Cabinet (PLC) division (LCO 3.3.2, ESFAS Instrumentation). Depending on the nature of the DC electrical power subsystem inoperability, one supported division of instrumentation could be considered inoperable. Inoperability of an ESFAC or PLC is similar to loss of one DC electrical power

(continued)

BASES

ACTIONS

A.1 (continued)

subsystem. In both cases, actuation of the safety functions associated with one of the four subsystems/divisions may no longer be available.

The installed spare battery bank and charger may be used to restore an inoperable Class 1E DC electrical power subsystem; however, all applicable Surveillances must be met by the spare equipment used, prior to declaring the subsystem OPERABLE.

B.1

Condition B represents two subsystems with a loss of ability to completely respond to an event, and a potential loss of ability to remain energized during normal operation. It is, therefore, imperative that the operator's attention focus on stabilizing the unit, minimizing the potential for complete loss of DC power to the affected distribution subsystems. The 2 hour limit is consistent with the allowed time for two inoperable DC distribution subsystems.

If two of the required DC electrical power subsystems are inoperable (e.g., inoperable battery, inoperable battery charger(s), or inoperable battery charger and associated inoperable battery), the two remaining DC electrical power subsystems have the capacity to support a safe shutdown and to mitigate all but the very worst case events. Since a subsequent worst case single failure would, however, result in the loss of the third subsystem, leaving only one subsystem with limited capacity to mitigate events, continued power operation should not exceed 2 hours. The 2 hour Completion Time is based on Regulatory Guide 1.93 (Ref. 8) and reflects a reasonable time to assess unit status as a function of the inoperable DC electrical power subsystem and, if the DC electrical power subsystem is not restored to OPERABLE status, to prepare to effect an orderly and safe unit shutdown.

C.1 and C.2

If the inoperable DC electrical power subsystem cannot be restored to OPERABLE status within the required Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be

(continued)

BASES

ACTIONS

C.1 and C.2 (continued)

brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE REQUIREMENTS

SR 3.8.1.1

Verifying battery terminal voltage while on float charge for the batteries helps to ensure the effectiveness of the charging system and the ability of the batteries to perform their intended function. Float charge is the condition in which the charger is supplying the continuous charge required to overcome the internal losses of a battery (or battery cell) and maintain the battery (or a battery cell) in a fully charged state. The voltage requirements are based on the nominal design voltage of the battery and are consistent with the initial voltages assumed in the battery sizing calculations. The 7 day Frequency is consistent with manufacturer recommendations and IEEE-450 (Ref. 8).

SR 3.8.1.2

Visual inspection to detect corrosion of the battery cells and connections, or measurement of the resistance of each intercell, interrack, intertier, and terminal connection, provides an indication of physical damage or abnormal deterioration that could potentially degrade battery performance.

The limits established for this SR shall be no more than 20% above the resistance as measured during installation or not above the ceiling value established by the manufacturer.

The Surveillance Frequency for these inspections, which can detect conditions that can cause power losses due to resistance heating, is 92 days. This Frequency is considered acceptable based on operating experience related to detecting corrosion trends.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.8.1.3

Visual inspection of the battery cells, cell plates, and battery racks provides an indication of physical damage or abnormal deterioration that could potentially degrade battery performance.

The 12 month Frequency for this SR is consistent with IEEE-450 (Ref. 8), which recommends detailed visual inspection of cell condition and rack integrity on a yearly basis.

SR 3.8.1.4 and SR 3.8.1.5

Visual inspection and resistance measurements of intercell, interrack, intertier, and terminal connections provide an indication of physical damage or abnormal deterioration that could indicate degraded battery condition. The anticorrosion material is used to help ensure good electrical connections and to reduce terminal deterioration. The visual inspection for corrosion is not intended to require removal of and inspection under each terminal connection. The removal of visible corrosion is a preventive maintenance SR. The presence of visible corrosion does not necessarily represent a failure of this SR provided visible corrosion is removed during performance of SR 3.8.1.4.

The connection resistance limits for this Surveillance Requirement shall be no more than 20% above the resistance as measured during installation, or not above the ceiling value established by the manufacturer.

The Surveillance Frequency of 12 months is consistent with IEEE-450 (Ref. 8), which recommends cell to cell and terminal connection resistance measurement on a yearly basis.

SR 3.8.1.6

This SR requires that each battery charger be capable of supplying [400] amps at ≥ [125] V for ≥ [24] hours. These requirements are based on the design capacity of the chargers (Ref. 4). According to Regulatory Guide 1.32 (Ref. 9), the battery charger supply is required to be based on the largest combined demands of the various steady state

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.8.1.6 (continued)

loads and the charging capacity to restore the battery from the design minimum charge state to the fully charged state, within 24 hours, irrespective of the status of the unit during these demand occurrences. The minimum required amperes and duration ensures that these requirements can be satisfied.

The Surveillance Frequency is acceptable, given the conditions required to perform the test and the other administrative controls existing to ensure adequate charger performance during these 24 month intervals. In addition, this Frequency is intended to be consistent with expected fuel cycle lengths. This Surveillance may be performed during any plant condition with the spare battery and charger providing power to the bus.

This SR is modified by a Note. The note acknowledges that credit may be taken for unplanned events that satisfy this SR.

SR 3.8.1.7

A battery service test is a special test of battery capability, as found, to satisfy the design requirements (battery duty cycle) of the Class 1E DC electrical power system. The discharge rate and test length corresponds to the design duty cycle requirements as specified in Reference 4.

The Surveillance Frequency of 24 months is consistent with the recommendations of Regulatory Guide 1.32 (Ref. 9) and Regulatory Guide 1.129 (Ref. 10), which state that the battery service test should be performed with intervals between tests not to exceed 24 months. This Surveillance may be performed during any plant condition with the spare battery and charger providing power to the bus.

This SR is modified by two Notes. Note 1 allows the performance of a modified performance discharge test in lieu of a service test once per 60 months.

The modified performance discharge test is a simulated duty cycle consisting of just two rates; the one minute rate published for the battery or the largest current load of the

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.8.1.7 (continued)

duty cycle, followed by the test rate employed for the performance test, both of which envelope the duty cycle of the service test. Since the ampere-hours removed by a rated one minute discharge represents a very small portion of the battery capacity, the test rate can be changed to that for the performance test without compromising the results of the performance discharge test. The battery terminal voltage for the modified performance discharge test should remain above the minimum battery terminal voltage specified in the battery service test for the duration of time equal to that of the service test.

A modified discharge test is a test of the battery capacity and its ability to provide a high rate, short duration load (usually the highest rate of the duty cycle). This will often confirm the battery's ability to meet the critical period of the load duty cycle, in addition to determining its percentage of rated capacity. Initial conditions for the modified performance discharge test should be identical to those specified for a service test.

Note 2 states that credit may be taken for unplanned events that satisfy this SR.

SR 3.8.1.8

A battery performance discharge test is a test of constant current capacity of a battery, normally done in the as found condition, after having been in service, to detect any change in the capacity determined by the acceptance test. The test is intended to determine overall battery degradation due to age and usage.

A battery modified performance discharge test is described in the Bases for SR 3.8.1.7. Either the battery performance discharge test or the modified performance discharge test is acceptable for satisfying SR 3.8.1.8; however, only the modified performance discharge test may be used to satisfy SR 3.8.1.8 while satisfying the requirements of SR 3.8.1.7 at the same time.

The acceptance criteria for this Surveillance are consistent with IEEE-450 (Ref. 8) and IEEE-485 (Ref. 5). These references recommend that the battery be replaced if its capacity is below 80% of the manufacturer's rating. A

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.8.1.8 (continued)

capacity of 80% shows that the battery rate of deterioration is increasing, even if there is ample capacity to meet the load requirements.

The Surveillance Frequency for this test is normally 60 months. If the battery shows degradation, or if the battery has reached 85% of its expected life and capacity is < 100% of the manufacterer's rating, the Surveillance Frequency is reduced to 12 months. However, if the battery shows no degradation but has reached 85% of its expected life, the Surveillance Frequency is only reduced to 24 months for batteries that retain capacity ≥ 100% of the manufacturer's rating. Degradation is indicated, according to IEEE-450 (Ref. 8), when the battery capacity drops by more than 10% relative to its capacity on the previous performance test or when it is ≥ 10% below the manufacturer's rating. These frequencies are consistent with the recommendations in IEEE-450 (Ref. 8).

This SR is modified by a Note that states credit may be taken for unplanned events that satisfy this SR.

REFERENCES

1. 10 CFR 50, Appendix A, GDC 17.
2. Regulatory Guide 1.6, "Independence Between Redundant Standby (Onsite) Power Sources and Between Their Distribution Systems," U.S. Nuclear Regulatory Commission, March 10, 1971.
3. IEEE-308 1980, "IEEE Standard Criteria for Class 1E Power Systems for Nuclear Power Generating Stations," Institute of Electrical and Electronic Engineers.
4. Section 8.3.2, "Class 1E DC Power Systems."
5. IEEE-485 1983, "Recommended Practices for Sizing Large Lead Storage Batteries for Generating Stations and Substations," Institute of Electrical and Electronic Engineers, June 1983.
6. Chapter 6, "Engineered Safety Features."
7. Chapter 15, "Accident Analyses."

(continued)

BASES

REFERENCES (continued)

8. IEEE-450 1987, "IEEE Recommended Practice for Maintenance Testing and Replacement of Large Lead Storage Batteries for Generating Stations and Subsystems," Institute of Electrical and Electronic Engineers, June 1986.

9. Regulatory Guide 1.32, "Criteria for Safety-Related Electric Power Systems for Nuclear Power Plants," U.S. Nuclear Regulatory Commission, February 1977.

10. Regulatory Guide 1.129 Revision 1, "Maintenance Testing and Replacement of Large Lead Storage Batteries for Nuclear Power Plants," U.S. Nuclear Regulatory Commission, February 1978.

B 3.8 ELECTRICAL POWER SYSTEMS

B 3.8.2 DC Sources – Shutdown

BASES

BACKGROUND

A description of the Class 1E DC power sources is provided in the Bases for LCO 3.8.1, "DC Sources – Operating."

APPLICABLE SAFETY ANALYSES

The initial conditions of Design Basis Accident (DBA) and transient analyses in the Chapter 6 (Ref. 1) and Chapter 15 (Ref. 2), assume engineered safety features are OPERABLE. The DC electrical power system provides normal and emergency DC electrical power for the emergency auxiliaries and control and switching during all MODES of operation.

The OPERABILITY of the DC subsystem is consistent with the initial assumptions of the accident analyses and the requirements for the supported systems' OPERABILITY.

The OPERABILITY of the minimum Class 1E DC power sources during MODES 5 and 6, as specified in the LCO, ensures that:

a. The unit can be maintained in the shutdown or refueling condition for extended periods;

b. Sufficient instrumentation and control capability is available for monitoring and maintaining the unit status; and

c. Adequate Class 1E DC power sources are provided to mitigate events postulated during shutdown, such as an inadvertent draindown of the vessel or a fuel-handling accident.

Many DBAs which are analyzed in MODES 1, 2, 3, and 4 have no specific analyses in MODES 5 and 6. Worst case, bounding events would not occur in MODES 5 and 6 because the probabilities of occurrence would be significantly reduced or eliminated, and the consequences would be minimal. Various deviations from the analysis assumptions and design requirements are allowed within the Actions during MODES 1, 2, 3, and 4 in recognition that certain testing and maintenance activities, both scheduled and unscheduled, must be conducted provided an acceptable level of risk is not exceeded.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

During MODES 5 and 6, performance of a significant number of required tests and maintenance activities is required.

In general, when the plant is shut down, the Technical Specification requirements ensure that the plant has the capability to mitigate the consequences of postulated accidents. Assumption of a single failure and concurrent loss of all offsite or loss of all onsite power. These deviations from DBA analysis assumptions and design requirements during shutdown conditions are allowed by the LCO for required systems.

The Class 1E DC Sources satisfy Criterion 3 of the NRC Policy Statement.

LCO

Class 1E DC electrical power subsystems are required to be OPERABLE to support required trains of Class 1E Distribution System divisions required to be OPERABLE by LCO 3.8.6. This ensures the availability of sufficient Class 1E DC power sources to operate the unit in a safe manner and to mitigate the consequences of postulated events during shutdown (e.g., fuel handling accidents, inadvertent reactor vessel draindown).

As described in the previous section, "Applicable Safety Analyses," in the event of an accident during shutdown, the Technical Specifications are designed to maintain the plant in such a condition that, even with a single failure, the plant will not be in immediate difficulty.

APPLICABILITY

The Class 1E DC power sources required to be OPERABLE in MODES 5 and 6 and during movement of irradiated fuel assemblies provide assurance that:

a. Required features to provide adequate coolant inventory makeup are available for the irradiated fuel assemblies in the core in case of an inadvertent draindown of the reactor vessel;

b. Required features needed to mitigate a fuel-handling accident are available;

(continued)

BASES

APPLICABILITY (continued)

c. Required features necessary to mitigate the effects of events that can lead to core damage during shutdown are available; and

d. Instrumentation and control capability is available for monitoring and maintaining the unit in a cold shutdown condition or refueling condition.

The Class 1E DC electrical power requirements for MODES 1, 2, 3, and 4 are covered in LCO 3.8.1, "DC Sources – Operating."

ACTIONS

A.1 and A.2

With one or more of the required (per LCO 3.8.6, "Distribution Systems – Shutdown") Class 1E DC power subsystems inoperable, the remaining subsystems may be capable of supporting sufficient systems to allow continuation of CORE ALTERATIONS, fuel movement, and/or operations with a potential for draining the reactor vessel. By allowing the option to declare required features inoperable with the associated DC power source(s) inoperable, appropriate restrictions will be implemented in accordance with the affected required features LCO ACTIONS. In many instances this option would likely involve undesired administrative efforts. Therefore, the allowance for sufficiently conservative actions is made (i.e., to suspend CORE ALTERATIONS, movement of irradiated fuel assemblies, any activities that could potentially result in inadvertent draining of the reactor vessel, and operations involving positive reactivity additions). The Required Action to suspend positive reactivity additions does not preclude actions to maintain or increase reactor vessel inventory, provided the required SDM is maintained.

Suspension of these activities shall not preclude completion of actions to establish a safe conservative condition. These actions minimize probability of the occurrence of postulated events. It is further required to immediately initiate action to restore the required DC electrical power subsystems and to continue this action until restoration is accomplished in order to provide the necessary Class 1E DC electrical power to the unit safety systems.

(continued)

BASES

ACTIONS	A.1 and A.2 (continued) The installed spare battery bank and charger may be used to restore an inoperable Class 1E DC power subsystem; however, all applicable surveillances must be met by the spare equipment used, prior to declaring the subsystem operable. The Completion Time of immediately is consistent with the required times for actions requiring prompt attention. The restoration of the required Class 1E DC electrical power subsystems should be completed as quickly as possible in order to minimize the time during which the unit safety systems may be without sufficient power.
SURVEILLANCE REQUIREMENTS	SR 3.8.2.1 SR 3.8.2.1 requires performance of all Surveillances required by SR 3.8.1.1 through SR 3.8.1.8. Therefore, see the corresponding Bases for LCO 3.8.1 for a discussion of each SR.
REFERENCES	1. Chapter 6, "Engineered Safety Features." 2. Chapter 15, "Accident Analysis."

B 3.8 ELECTRICAL POWER SYSTEMS

B 3.8.3 Inverters – Operating

BASES

BACKGROUND

The inverters are the preferred source of power for the Class 1E AC instrument and control buses because of the stability and reliability they achieve. Divisions A and D, each consist of one Class 1E inverter. Divisions B and C, each consist of two inverters. The function of the inverter is to convert Class 1E DC electrical power to AC electrical power, thus providing an uninterruptible power source for the instrumentation and controls for the Protection and Safety Monitoring System (PMS). The inverters are powered from the Class 1E 125 V battery sources (Ref. 1).

Under normal operation, a Class 1E inverter supplies power to the Class 1E AC instrument and control bus. If the inverter is inoperable or the Class 1E 125 VDC input to the inverter is unavailable, the Class 1E AC instrument and control bus is powered from the backup source associated with the same division via a static transfer switch featuring a make-before-break contact arrangement. In addition, a manual mechanical bypass switch is used to provide a backup power source to the Class 1E AC instrument and control bus when the inverter is removed from service. The backup source is a Class 1E regulating 480-208/120 volt transformer providing a regulated output to the Class 1E AC instrument and control bus through a static transfer switch and a manual bypass switch.

In addition to powering safety loads, the Class 1E AC power sources are used for emergency lighting in the main control room and remote shutdown workstation. When a normal AC power source for emergency lighting is lost, the loads are automatically transferred to a Class 1E AC power source. Specific details on inverters and their operating characteristics are found in Chapter 8 (Ref. 1).

APPLICABLE SAFETY ANALYSES

The initial conditions of Design Basis Accident (DBA) transient analyses in Chapter 6 (Ref. 2) and Chapter 15 (Ref. 3), assume engineered safety features are OPERABLE. The inverters are designed to provide the required capacity, capability, redundancy, and reliability to ensure the availability of necessary power to the PMS instrumentation and controls so that the fuel, Reactor

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

Coolant System (RCS), and containment design limits are not exceeded. These limits are discussed in more detail in the Bases for Technical Specifications 3.2 (Power Distribution Limits), 3.4 (Reactor Coolant System), and 3.6 (Containment Systems).

The OPERABILITY of the inverters is consistent with the initial assumptions of the accident analyses and is based on meeting the design basis of the unit. This includes maintaining at least three of the four Divisions of AC instrument and control buses OPERABLE during accident conditions in the event of:

a. An assumed loss of all offsite and onsite AC power source; and

b. A worst case single failure.

Inverters are a part of distribution systems, and as such, satisfy Criterion 3 of the NRC Policy Statement.

LCO

The inverters ensure the availability of AC electrical power for the systems instrumentation required to shut down the reactor and maintain it in a safe condition after an anticipated operational occurrence (AOO) or a postulated DBA.

Maintaining the required inverters OPERABLE ensures that the redundancy incorporated into the design of the PMS instrumentation and controls is maintained. The six inverters ensure an uninterruptible supply of AC electrical power to the six Class 1E AC instrument and control buses even if all AC power sources are de-energized.

OPERABILITY as it applies to inverters, requires that the Class 1E AC instrument and control bus be powered by the inverter with output voltage and frequency within tolerances, and the power input to the inverter from a 125 VDC station battery.

This LCO is modified by a Note that allows one inverter to be disconnected from its associated Class 1E DC bus for ≤ 72 hours, if the associated Class 1E AC instrument and control bus is powered from its Class 1E regulating transformer during the period and all other inverters are

(continued)

BASES

LCO (continued)

OPERABLE. This allows an equalizing charge to be placed on one battery bank. If the inverter was not disconnected, the resulting voltage condition might damage the inverter. These provisions minimize the loss of equipment that would occur in the event of a loss of offsite power. The 72 hour time period for the allowance minimizes the time during which a loss of offsite power could result in the loss of equipment energized from the affected Class 1E AC instrument and control bus while taking into consideration the time required to perform an equalizing charge on the battery bank.

The intent of this Note is to limit the number of inverters that may be disconnected. Only the inverter associated with the single battery bank undergoing an equalizing charge may be disconnected. All other inverters must be aligned to their associated batteries.

APPLICABILITY

The inverters are required to be OPERABLE in MODES 1, 2, 3, and 4 to ensure that:

a. Acceptable fuel design limits and reactor coolant pressure boundary limits are not exceeded as a result of AOOs or abnormal transients; and

b. Adequate core cooling is provided, and containment OPERABILITY and other vital functions are maintained in the event of a postulated DBA.

Inverter requirements for MODES 5 and 6 are covered in the Bases for LCO 3.8.4, "Inverters - Shutdown."

ACTIONS

A.1

With a required inverter inoperable, its associated Class 1E AC instrument and control bus is automatically energized from its regulating transformer. A manual switch is also provided which can be used if the static transfer switch does not properly function.

(continued)

BASES

ACTIONS

A.1 (continued)

For this reason a Note has been included in Condition A requiring the entry into the Conditions and Required Actions of LCO 3.8.5, "Distribution System - Operating." This ensures that the vital bus is re-energized within 12 hours.

Required Action A.1 allows 24 hours to fix the inoperable inverter and return it to service. The 24 hour time limit is based upon engineering judgment, taking into consideration the time required to repair an inverter and the additional risk to which the unit is exposed because of the inverter inoperability. This has to be balanced against the risk of an immediate shutdown, along with the potential challenges to safety systems such a shutdown might entail. When the AC instrument and control bus is powered from its regulating transformer, it is relying upon interruptible AC electrical power sources (offsite and onsite). The uninterruptible inverter source to the AC instrument and control buses is the preferred source for powering instrumentation trip setpoint devices.

B.1 and B.2

If the inoperable DC electrical power subsystem cannot be restored to OPERABLE status within the required Completion Time, the unit must be brought to MODE 5 where the probability and consequences on an event are minimized. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE REQUIREMENTS

SR 3.8.3.1

This Surveillance verifies that the inverters are functioning properly with all required switches and circuit breakers closed and Class 1E AC instrument and control buses energized from the inverter. The verification of proper voltage and frequency output ensures that the required power is readily available for the PMS instrumentation connected

(continued)

BASES

SURVEILLANCE REQUIREMENTS	SR 3.8.3.1 (continued) to the Class 1E AC instrument and control buses. The 7 day Frequency takes into account the effectiveness of the voltage and frequency instruments, the redundant capability of the inverters, and other indications available in the control room that alert the operator to inverter malfunctions.
REFERENCES	1. Section 8.3.2.1.1.2, "Class 1E Uninterruptible Power Supplies." 2. Chapter 6, "Engineered Safety Features." 3. Chapter 15, "Accident Analyses."

B 3.8 ELECTRICAL POWER SYSTEMS

B 3.8.4 Inverters – Shutdown

BASES

BACKGROUND

A description of the inverters is provided in the Bases for Specification 3.8.3, "Inverters – Operating."

APPLICABLE SAFETY ANALYSES

The initial conditions of Design Basis Accident (DBA) and transient analyses in Chapter 6 (Ref. 1) and Chapter 15 (Ref. 2), assume engineered safety features are OPERABLE. The DC to AC inverters are designed to provide the required capacity, capability, redundancy, and reliability to ensure the availability of necessary power to the Protection and Monitoring System Engineered Safety Feature Actuation System instrumentation and controls so that the fuel, Reactor Coolant System, and containment design limits are not exceeded.

The OPERABILITY of the inverters is consistent with the initial assumptions of the accident analyses and the requirements for the supported systems' OPERABILITY.

The OPERABILITY of the minimum inverters to each Class 1E AC instrument and control bus during MODES 5 and 6, ensures that (Refs. 1 and 2):

a. The unit can be maintained in the shutdown or refueling condition for extended periods;

b. Sufficient instrumentation and control capability is available for monitoring and maintaining the unit status; and

c. Adequate power is available to mitigate events postulated during shutdown, such as an inadvertent draindown of the vessel or a fuel handling accident.

Many DBAs which are analyzed in MODES 1, 2, 3, and 4 have no specific analyses in MODES 5 and 6. Worst case, bounding events would not occur in MODES 5 and 6 because the probabilities of occurrence would be significantly reduced or eliminated, and the consequences would be minimal.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)	Various deviations from the analysis assumptions and design requirements are allowed within the Actions during MODES 1, 2, 3, and 4 in recognition that certain testing and maintenance activities, both scheduled and unscheduled, must be conducted provided an acceptable level of risk is not exceeded.

During MODES 5 and 6, performance of a significant number of required testing and maintenance activities is required.

When the plant is shut down, the Technical Specification requirements ensure that the plant has the capability to mitigate the consequences of postulated accidents. Assumption of a single failure, and concurrent loss of all offsite or loss of all onsite power is not required. These deviations from DBA analysis assumptions and design requirements during shutdown conditions are allowed by the LCO for required systems.

The Class 1E UPS inverters are part of the distribution system and, as such, satisfy Criterion 3 of the NRC Policy Statement.

LCO

The inverters ensure the availability of electrical power for the instrumentation for systems required to shut down the reactor and maintain it in a safe condition after an anticipated operational occurrence or postulated DBA. The battery powered inverters provide an uninterruptible supply of AC electrical power to the Class 1E AC instrument and control buses, even if the normal power supply from the 480 VAC is deenergized. OPERABILITY of the inverters requires that the Class 1E instrument and control buses be powered by the inverter with output voltage and frequency within tolerances, and the power input to the inverter from a 125 VDC station battery. This ensures the availability of sufficient inverter power sources to operate the plant in a safe manner and to mitigate the consequences of postulated events during shutdown (fuel handling accidents, inadvertent reactor vessel draindown).

(continued)

BASES (continued)

APPLICABILITY

As described in the previous section, "Applicable Safety Analyses," in the event of an accident during shutdown, the Technical Specifications are designed to maintain the plant in a condition so that even with a single failure, the plant will not be in immediate difficulty.

The inverters required to be OPERABLE in MODES 5 and 6 and during movement of irradiated fuel assemblies provide assurance that:

a. Systems to provide adequate coolant inventory makeup are available for the irradiated fuel in the core in case of an inadvertent draindown of the reactor vessel;

b. Systems needed to mitigate a fuel handling accident are available;

c. Systems necessary to mitigate the effects of events that can lead to core damage during shutdown are available; and

d. Instrumentation and control capability is available for monitoring and maintaining the unit in a cold shutdown condition or refueling condition.

Class 1E UPS inverter requirements for MODES 1, 2, 3, and 4 are covered in LCO 3.8.3, "Inverters – Operating."

ACTIONS

A.1 and A.2

If one or more required (per LCO 3.8.6, Distribution Systems – Shutdown) inverters are inoperable, the remaining OPERABLE inverters may be capable of supporting required features to allow continuation of CORE ALTERATIONS, fuel movement, and operations with a potential for draining the reactor vessel. By allowance of the option to declare required features inoperable with associated inverter(s) inoperable, appropriate restrictions will be implemented in accordance with the affected required features LCOs' Required Actions. In many instances, this option may involve undesired administrative efforts. Therefore, the allowance for sufficiently conservative actions is made (i.e., suspend CORE ALTERATIONS, movement of irradiated fuel assemblies, any activities that could potentially result in inadvertent draining of the reactor vessel, and operations

(continued)

BASES

ACTIONS

A.1 and A.2 (continued)

involving positive reactivity additions). The Required Action to suspend positive reactivity additions does not preclude actions to maintain or increase reactor vessel inventory, provided the required SDM is maintained.

Suspension of these activities shall not preclude completion of actions to establish a safe conservative condition. These actions minimize the probability of the occurrence of postulated events. It is further required to immediately initiate action to restore the required inverters and to continue this action until restoration is accomplished in order to provide the necessary inverter power to the unit safety systems.

The Completion Time of immediately is consistent with the required times for actions requiring prompt attention. The restoration of the required inverters should be completed as quickly as possible in order to minimize the time the unit safety systems may be without power or powered from a regulating transformer.

SURVEILLANCE REQUIREMENTS

SR 3.8.4.1

This Surveillance verifies that the inverters are functioning properly with all required circuit breakers closed and Class 1E AC instrument and control buses energized from the inverter. The verification of proper voltage and frequency output ensures that the required power is readily available for the instrumentation connected to the Class 1E AC instrument and control buses. The 7 day Frequency takes into account the effectiveness of the voltage and frequency instruments, the redundant capability of the inverters, and other indications available in the control room that alert the operator to inverter malfunctions.

REFERENCES

1. Chapter 6, "Engineered Safety Features."
2. Chapter 15, "Accident Analysis."

B 3.8 ELECTRICAL POWER SYSTEMS

B 3.8.5 Distribution Systems – Operating

BASES

BACKGROUND

The onsite Class 1E and DC and UPS electrical power distribution system is divided by division into four independent AC and DC electrical power distribution subsystems (Divisions A, B, C, and D).

The Class 1E AC distribution Divisions A and D each consists of one 208/120 V bus. The Class 1E AC distribution Divisions B and C each consists of two 208/120 V buses. The buses are normally powered from separate inverters which are connected to the respective Division Class 1E battery banks. The backup source provided for each Division for the Class 1E AC instrument and control buses is a Class 1E regulating transformer providing regulated output to the Class 1E AC instrument and control buses through a static transfer switch and a manual bypass switch. Power to the transformer is provided by the nonsafety related Main AC Power System. Additional description of this system may be found in the Bases for Specification 3.8.3, "Inverters – Operating."

The Class 1E DC distribution Divisions A and D each consists of one 125 VDC bus. The Class 1E DC distribution Divisions B and C each consists of two 125 VDC buses. The buses for the four Divisions are normally powered from their associated Division battery chargers. The backup source for each Class 1E DC bus is its associated Class 1E battery bank. Additionally, there is one installed spare Class 1E battery bank and one installed spare Class 1E battery charger, which can provide backup power to a Class 1E DC bus in the event that one of the battery banks or one of the chargers is out of service. Additional description of this system may be found in the Bases for Specification 3.8.1, "DC Sources Operating."

The list of all required distribution buses is presented in Table B 3.8.5-1 and shown in Section 8.3.2 (Ref. 1).

(continued)

BASES (continued)

APPLICABLE SAFETY ANALYSES

The initial conditions of Design Basis Accident (DBA) and transient analyses in Chapter 6 (Ref. 2) and Chapter 15 (Ref. 3), assume engineered safety features (ESFs) are OPERABLE. The Class 1E AC and DC electrical power distribution systems are designed to provide sufficient capacity, capability, redundancy, and reliability to ensure the availability of necessary power to the ESFs so that the fuel, Reactor Coolant System (RCS) and containment design limits are not exceeded. These limits are discussed in more detail in the Bases for Technical Specifications 3.2 (Power Distribution Limits), 3.4 (Reactor Coolant System), and 3.6 (Containment Systems).

The OPERABILITY of the Class 1E AC and DC electrical power distribution systems is consistent with the initial assumptions of the accident analyses and is based upon meeting the design basis of the unit. This includes maintaining at least three of the four Divisions of Class 1E AC and DC power distribution systems OPERABLE during accident conditions in the event of:

a. An assumed loss of all offsite and onsite AC power sources; and

b. A worst case single failure.

The Class 1E AC and DC electrical power distribution system satisfy Criterion 3 of the NRC Policy Statement.

LCO

The required power distribution subsystems listed in Table B 3.8.5-1 ensure the availability of Class 1E AC and DC electrical power for the systems required to shut down the reactor and maintain it in a safe condition after an anticipated operational occurrence (AOO) or a postulated DBA. The Division A, B, C, and D Class 1E AC and DC electrical power distribution subsystems are required to be OPERABLE.

Maintaining the Division A, B, C, and D AC and DC electrical power distribution subsystems OPERABLE ensures that the redundancy incorporated into the design of the ESFs is not defeated. Three of the four Class 1E AC and DC power

(continued)

BASES

LCO (continued)

distribution subsystems are capable of providing the necessary electrical power to the associated ESF components. Therefore, a single failure within any subsystem or within the electrical power distribution subsystems will not prevent safe shutdown of the reactor.

OPERABILITY, as it applies to the Class 1E DC electric power distribution subsystems, requires the associated buses, motor control centers, and electrical circuits to be energized to their proper voltage from either the associated battery bank or charger. The spare battery bank and/or chargers may be used by one subsystem for OPERABILITY. OPERABILITY, as it applies to the Class 1E AC electrical power distribution subsystems, requires the associated buses to be energized to their proper voltages and frequencies from the associated inverter or regulating transformer.

APPLICABILITY

The Class 1E AC and DC electrical power distribution subsystems are required to be OPERABLE in MODES 1, 2, 3, and 4 to ensure that:

a. Acceptable fuel design limits and reactor coolant pressure boundary limits are not exceeded as a result of AOOs or abnormal transients; and

b. Adequate core cooling is provided, and containment OPERABILITY and other vital functions are maintained in the event of a postulated DBA.

The Class 1E AC and DC electrical power distribution subsystem requirements for MODES 5 and 6 are covered in the Bases for Specification 3.8.6, "Class 1E Distribution Systems – Shutdown."

ACTIONS

A.1

With one division of the Class 1E AC instrument and control bus inoperable the remaining Class 1E AC instrument and control buses have the capacity to support a safe shutdown and to mitigate all DBAs, based on conservative analysis.

(continued)

BASES

ACTIONS

A.1 (continued)

Because of the passive system design and the use of fail-safe components, the remaining Class 1E AC instrument and control buses have the capacity to support a safe shutdown and to mitigate most design basis accidents following a subsequent worst case single failure. The 6 hour Completion Time is reasonable based on engineering judgement balancing the risks of operation without one AC instrument and control bus against the risks of a forced shutdown. Additionally, the Completion Time reflects a reasonable time to assess plant status; attempt to repair or replace, thus avoiding an unnecessary shutdown; and, if necessary, prepare and effect an orderly and safe shutdown.

This 6 hour limit is shorter than Completion Times allowed for most supported systems which would be without power. Taking exception to LCO 3.0.2 for components without adequate DC Power, which would have Required Action Completion Times shorter than 6 hours, is acceptable because of:

a. The potential for decreased safety by requiring a change in unit conditions (i.e., requiring a shutdown) while allowing stable operations to continue;

b. The potential for decreased safety by requiring entry into numerous applicable Conditions and Required Actions for components without DC power and not providing sufficient time for the operators to perform the necessary evaluations and actions for restoring power to the affected division; and

c. The potential for an event in conjunction with a single failure of a redundant component.

The 6 hour Completion Time takes into account the importance to safety of restoring the Class 1E AC instrument and control bus to OPERABLE status, the passive design of the ESF systems, the redundant capability afforded by the other OPERABLE Class 1E AC instrument and control buses, and the low probability of a DBA occurring during this period which requires more than two OPERABLE AC instrument and control buses.

(continued)

BASES

ACTIONS

A.1 (continued)

The 6 hour Completion Time is also consistent with the time specified for restoration of one (of four) Engineered Safety Features Actuation Cabinet (ESFAC) or Protection Logic Cabinet (PLC) division (LCO 3.3.2, ESFAS Instrumentation). Depending on the nature of the AC instrument and control inoperability, one supported division of instrumentation could be considered inoperable. Inoperability of an ESFAC or PLC is similar to loss of one division AC instrument and control bus. In both cases, actuation of the safety functions associated with one of the four subsystems/divisions may no longer be available.

The second Completion Time for Required Action A.1 establishes a limit on the maximum time allowed for any combination of required distribution subsystems to be inoperable during any single contiguous occurrence of failing to meet the LCO. If Condition A is entered while, for instance, a DC bus is inoperable and subsequently restored OPERABLE, the LCO may already have been not met for up to 6 hours. This could lead to a total of 12 hours, since initial failure of the LCO, to restore the AC instrument and control distribution system. At this time, a DC circuit could again become inoperable, and AC instrument and control distribution restored OPERABLE. This could continue indefinitely.

The Completion Time allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." This will result in establishing the "time zero" at the time the LCO was initially not met, instead of the time Condition A was entered. The 12 hour Completion Time is an acceptable limitation on this potential to fail to meet the LCO indefinitely.

B.1

With one Division of the Class 1E DC electrical power distribution subsystem inoperable, the remaining Divisions have the capacity to support a safe shutdown and to mitigate all DBAs, based on conservative analysis.

(continued)

BASES

ACTIONS

B.1 (continued)

Because of the passive system design and the use of fail-safe components, the remaining Divisions have the capacity to support a safe shutdown and to mitigate most design basis accidents following a subsequent worst case single failure. The 6 hour Completion Time is reasonable based on engineering judgement balancing the risks of operation without one Division against the risks of a forced shutdown. Additionally, the completion time reflects a reasonable time to assess plant status; attempt to repair or replace, thus avoiding an unnecessary shutdown; and, if necessary, prepare and effect an orderly and safe shutdown.

The 6 hour Completion Time is also consistent with the time specified for restoration of one (of four) Engineered Safety Features Actuation Cabinet (ESFAC) or Protection Logic Cabinet (PLC) division (LCO 3.3.2, ESFAS Instrumentation). Depending on the nature of the DC electrical power distribution subsystem inoperability, one supported division of instrumentation could be considered inoperable. Inoperability of an ESFAC or PLC is similar to loss of one DC electrical power distribution subsystem. In both cases, actuation of the safety functions associated with one of the four subsystems/divisions may no longer be available.

This 6 hour limit is shorter than Completion Times allowed for most supported systems which would be without power. Taking exception to LCO 3.0.2 for components without adequate DC power, which would have Required Action Completion Times shorter than 6 hours, is acceptable because of:

a. The potential for decreased safety by requiring a change in unit conditions (i.e., requiring a shutdown) while allowing stable operations to continue;

b. The potential for decreased safety by requiring entry into numerous applicable Conditions and Required Actions for components without DC power and not providing sufficient time for the operators to perform the necessary evaluations and actions to restore power to the affected division; and

c. The potential for an event in conjunction with a single failure of a redundant component.

(continued)

BASES

ACTIONS

B.1 (continued)

The second Completion Time for Required Action B.1 establishes a limit on the maximum time allowed for any combination of required distribution subsystems to be inoperable during any single contiguous occurrence of failing to meet the LCO. If Condition B is entered while, for instance, an AC instrument and control bus is inoperable and subsequently returned OPERABLE, the LCO may already have been not met for up to 6 hours. This could lead to a total of 6 hours, since initial failure of the LCO, to restore the DC distribution system. At this time, an AC train could again become inoperable, and DC distribution restored OPERABLE. This could continue indefinitely.

This Completion Time allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." This will result in establishing the "time zero" at the time the LCO was initially not met, instead of the time Condition B was entered. The 12 hour Completion Time is an acceptable limitation on this potential to fail to meet the LCO indefinitely.

C.1

With two divisions of AC instrument and control buses inoperable, the remaining OPERABLE buses are capable of supporting the minimum safety functions necessary to shut down the unit and maintain it in the safe shutdown condition. Overall reliability is reduced, however, since an additional single failure could result in the minimum required ESF functions not being supported. Therefore, the required divisions of AC instrument and control buses must be restored to OPERABLE status within 2 hours by powering the bus from the associated [inverter via inverted DC, inverter using internal AC source, or Class 1E constant voltage transformer].

Condition C represents two divisions of AC instrument and control vital buses without power; potentially both the DC source and the associated AC source are nonfunctioning. In this situation, the unit is significantly more vulnerable to a complete loss of all noninterruptable power. It is,

(continued)

BASES

ACTIONS

C.1 (continued)

therefore, imperative that the operator's attention focus on stabilizing the unit, minimizing the potential for loss of power to the remaining buses and restoring power to the affected buses.

This 2 hour time limit is more conservative than Completion Times allowed for the vast majority of components that are without adequate AC instrument and control power. Taking exception to LCO 3.0.2 for components without adequate vital AC power, which would have the Required Action Completion Times shorter than 2 hours if declared inoperable, is acceptable because of:

a. The potential for decreased safety by requiring a change in unit conditions (i.e., requiring a shutdown) and not allowing stable operations to continue);

b. The potential for decreased safety by requiring entry into numerous Applicable Conditions and Required Actions for components without adequate AC power and not providing sufficient time for the operators to perform the necessary evaluations and actions for restoring power to the affected train; and

c. The potential for an event in conjunction with a single failure of a redundant component.

The 2 hour Completion Time takes into account the importance to safety of restoring the AC instrument and control buses to OPERABLE status, the redundant capability afforded by the other OPERABLE buses, and the low probability of a DBA occurring during this period.

(continued)

BASES

ACTIONS

C.1 (continued)

The second Completion Time for Required Action C.1 establishes a limit on the maximum allowed for any combination of required distribution subsystems to be inoperable during any single contiguous occurrence of failing to meet the LCO. If Condition C is entered while, for instance, a DC bus is inoperable and subsequently returned to OPERABLE, the LCO may already have been not met for up to 12 hours. This could lead to a total of 14 hours, since initial failure of the LCO, to restore the bus distribution system. At this time, a DC train could again become inoperable, and AC bus distribution restored to OPERABLE. This could continue indefinitely.

This Completion Time allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." This will result in establishing the "time zero" at the time the LCO was initially not met, instead of the time Condition B was entered. The 16 hour Completion Time is an acceptable limitation on this potential to fail to meet the LCO indefinitely.

D.1

With two divisions of DC electrical power distribution subsystems inoperable, the remaining DC electrical power distribution subsystems are capable of supporting the minimum safety functions necessary to shut down the reactor and maintain it in a safe shutdown condition, assuming no single failure. The overall reliability is reduced, however, because a single failure in the remaining DC electrical power distribution subsystem could result in the minimum required ESF functions not being supported. Therefore, the [required] DC buses must be restored to OPERABLE status within 2 hours by powering the bus from the associated battery or charger.

Condition D represents two subsystems without adequate DC power; potentially both with the battery significantly degraded and the associated charger nonfunctioning. In this situation, the unit is significantly more vulnerable to a complete loss of all DC power. It is, therefore, imperative

(continued)

BASES

ACTIONS

D.1 (continued)

that the operator's attention focus on stabilizing the unit, minimizing the potential for loss of power to the remaining divisions and restoring power to the affected divisions.

This 2 hour limit is more conservative than Completion Times allowed for the vast majority of components that would be without power. Taking exception to LCO 3.0.2 for components without adequate DC power, which would have Required Action Completion Times shorter than 2 hours, is acceptable because of:

a. The potential for decreased safety by requiring a change in unit conditions (i.e., requiring a shutdown) while allowing stable operations to continue;

b. The potential for decreased safety by requiring entry into numerous applicable Conditions and Required Actions for components without DC power and not providing sufficient time for the operators to perform the necessary evaluations and actions for restoring power to the affected divisions; and

c. The potential for an event in conjunction with a single failure of a redundant component.

The 2 hour Completion Time for DC buses is consistent with Regulatory Guide 1.93 (Ref. 3).

The second Completion Time for Required Action D.1 establishes a limit on the maximum time allowed for any combination of required distribution subsystems to be inoperable during any single contiguous occurrence of failing to meet the LCO. If Condition D is entered while, for instance, an AC instrument and control bus is inoperable and subsequently returned OPERABLE, the LCO may already have been not met for up to 12 hours. This could lead to a total of 14 hours, since initial failure of the LCO, to restore the DC distribution system. At this time, an AC train could again become inoperable, and DC distribution restored to OPERABLE. This could continue indefinitely.

(continued)

BASES

ACTIONS

D.1 (continued)

This Completion Time allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." This will result in establishing the "time zero" at the time the LCO was initially not met, instead of the time Condition C was entered. The 16 hour Completion Time is an acceptable limitation on this potential to fail to meet the LCO indefinitely.

E.1 and E.2

If the inoperable distribution subsystem cannot be restored to OPERABLE status within the required Completion Time, the unit must be brought to MODE 5 where the probability and consequences on an event are minimized. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging plant systems.

F.1

With two Divisions with inoperable distribution subsystems that result in a loss of safety function, adequate core cooling, containment OPERABILITY and other vital functions for DBA mitigation would be compromised, and immediate plant shutdown in accordance with LCO 3.0.3 is required.

SURVEILLANCE REQUIREMENTS

SR 3.8.5.1

This Surveillance verifies that the Class 1E AC and DC electrical power distribution subsystems are functioning properly, with the required circuit breakers and switches properly aligned. The verification of proper voltage availability on the buses ensures that the required voltage is readily available for motive as well as control functions for critical system loads connected to these buses. The 7 day Frequency takes into account the redundant capability of the Class 1E AC and DC electrical power distribution subsystems, and other indications available in the control room that alert the operator to subsystem malfunctions.

(continued)

BASES (continued)

Table B 3.8.5-1 (page 1 of 1)
Class 1E AC and DC Electrical Power Distribution System

TYPE	VOLTAGE	DIVISION A*	DIVISION B*	DIVISION C*	DIVISION D*
DC Buses	125 Vdc	IDSA-DS-1	IDSB-DS-1 IDSB-DS-2	IDSC-DS-1 IDSC-DS-2	IDSD-DS-1
DC Distribution Panels	125 Vdc	IDSA-DD-1 IDSA-DK-1	IDSB-DD-1 IDSB-DK-1	IDSC-DD-1 IDSC-DK-1	IDSD-DD-1 IDSD-DK-1
AC Instrumentation and Control Buses	120 Vac	IDSA-EA-1	IDSB-EA-1 IDSB-EA-3	IDSC-EA-1 IDSC-EA-3	IDSD-EA-1

* Each Division of the AC and DC electrical power distribution systems is a subsystem.

(continued)

BASES (continued)

REFERENCES

1. Section 8.3.2, "DC Power Systems."
2. Chapter 6, "Engineering Safety Features."
3. Chapter 15, "Accident Analyses."

B 3.8 ELECTRICAL POWER SYSTEMS

B 3.8.6 Distribution System – Shutdown

BASES

BACKGROUND

A description of the Class 1E AC instrument and control bus and Class 1E DC electrical power distribution system is provided in the Bases for Specification 3.8.5, "Distribution System – Operating."

APPLICABLE SAFETY ANALYSES

The initial conditions of Design Basis Accident (DBA) and transient analyses in Chapter 6 (Ref. 1) and Chapter 15 (Ref. 2), assume engineered safety features are OPERABLE. The Class 1E AC and DC electrical power sources and associated power distribution systems are designed to provide sufficient capacity, redundancy, and reliability to ensure the availability of necessary power to the ESF systems so that the fuel, Reactor Coolant System, and containment design limits are not exceeded.

The OPERABILITY of the minimum Class 1E AC and DC electrical power sources and associated power distribution subsystems during MODES 5 and 6, ensures that:

a. The unit can be maintained in the shutdown or refueling condition for extended periods;

b. Sufficient instrumentation and control capability is available for monitoring and maintaining the unit status; and

c. Adequate power is provided to mitigate events postulated during shutdown, such as an inadvertent draindown of the vessel or a fuel handling accident.

Many DBAs which are analyzed in MODES 1, 2, 3, and 4, have no specific analyses in MODES 5 and 6. Worst case, bounding events would not occur in MODES 5 and 6 because the probabilities of occurrence would be significantly reduced or eliminated, and consequences would be minimal. Various deviations from the analysis assumptions and design requirements are allowed within the Actions during MODES 1, 2, 3, and 4 in recognition that certain testing and

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)	maintenance activities, both scheduled and unscheduled, must be conducted provided an acceptable level of risk is not exceeded. During MODES 5 and 6, performance of a significant number of required testing and maintenance activities is required. In general, when the plant is shut down, the Technical Specification requirements ensure that the plant has the capability to mitigate the consequences of postulated accidents. The Class 1E AC and DC electrical power distribution systems satisfy Criterion 3 of the NRC Policy Statement.
LCO	Various combinations of subsystems, equipment, and components are required OPERABLE by other LCOs, depending on the specific plant condition. Implicit in those requirements is the required OPERABILITY of necessary support required features. This LCO explicitly requires energization of the portions of the electrical distribution system necessary to support OPERABILITY of required systems, equipment, and components–all specifically addressed in each LCO and implicitly required via the definition of OPERABILITY. Maintaining these portions of the distribution system energized ensures the availability of sufficient power to operate the unit in a safe manner to mitigate the consequences of postulated events during shutdown (e.g., fuel handling accidents).
APPLICABILITY	The Class 1E AC and DC electrical power distribution subsystems are required to be OPERABLE in MODES 5 and 6 and during movement of irradiated fuel assemblies provide assurance that: a. Systems to provide adequate coolant inventory makeup are available for the irradiated fuel assemblies in the core in case of an inadvertent draindown of the reactor vessel; b. Systems needed to mitigate a fuel handling accident are available;

(continued)

BASES

APPLICABILITY (continued)

c. Systems necessary to mitigate the effects of events that can lead to core damage during shutdown are available; and

d. Instrumentation and control capability is available for monitoring and maintaining the unit in a cold shutdown condition and refueling condition.

The Class 1E AC and DC electrical power distribution subsystem requirements for MODES 1, 2, 3, and 4 are covered in LCO 3.8.5, "Distribution Systems – Operating."

ACTIONS

A.1 and A.2

If one or more required Class 1E DC or Class 1E AC instrument and control bus electrical power distribution subsystems are inoperable, the remaining OPERABLE divisions may be capable of supporting required features to allow continuation of CORE ALTERATIONS, fuel movement, and/or operations with a potential for draining the reactor vessel. By allowing the option to declare required features associated with an inoperable distribution subsystem inoperable, appropriate restrictions will be implemented in accordance with the affected equipment LCO Required Actions. In many instances this would likely involve undesired administrative efforts. Therefore, the allowance for sufficiently conservative actions is made (i.e., to suspend CORE ALTERATIONS, movement of irradiated fuel assemblies, any activities that could potentially result in inadvertent draining of the reactor vessel, and operations involving positive reactivity additions).

Suspension of these activities does not preclude completion of actions to establish a safe conservative condition. These actions will minimize the probability of the occurrence of postulated events. It is further required to immediately initiate action to restore the required AC and DC electrical power distribution subsystems and to continue this action until restoration is accomplished in order to provide the necessary power to the unit safety systems.

The Completion Time of immediately is consistent with the required times for actions requiring prompt attention. The restoration of the required distribution subsystems should be completed as quickly as possible in order to minimize the time the unit safety systems may be without power.

(continued)

BASES (continued)

SURVEILLANCE REQUIREMENTS

SR 3.8.6.1

This Surveillance verifies that the Class 1E AC and DC electrical power distribution subsystems are functioning properly, with the required circuit breakers and switches properly aligned. The verification of proper voltage availability on the buses ensures that the required power is readily available for motive as well as control functions for critical system loads connected to these buses. The 7 day Frequency takes into account the redundant capability of the electrical power distribution subsystems and other indications available in the control room that alert the operator to subsystem malfunctions.

REFERENCES

1. Chapter 6, "Engineered Safety Features."
2. Chapter 15, "Accident Analysis."
3. Section 8.3.2, "DC Power Systems."

B 3.8 ELECTRICAL POWER SYSTEMS

B 3.8.7 Battery Cell Parameters

BASES

BACKGROUND	LCO 3.8.7, Battery Cell Parameters, delineates the limits on electrolyte temperature, level, float voltage and specific gravity for the DC power source batteries. A discussion of these batteries and their OPERABILITY requirements is provided in the Bases for LCO 3.8.1, "DC Sources – Operating," and LCO 3.8.2, "DC Sources – Shutdown."
APPLICABLE SAFETY ANALYSES	The initial conditions of Design Basis Accident (DBA) and transient analyses in Chapter 6 (Ref. 4), and Chapter 15 (Ref. 5), assume engineered safety features are OPERABLE. The DC electrical power system provides normal and emergency DC electrical power for safety related and vital control instrumentation loads including monitoring and main control room emergency lighting during all MODES of operation. It also provides power for safe shutdown when all the onsite and offsite AC power sources are lost. The OPERABILITY of the DC subsystems is consistent with the initial assumptions of the accident analyses and is based upon meeting the design basis of the unit. This includes maintaining at least three of the four Divisions of DC sources OPERABLE during accident conditions, in the event of: a. An assumed loss of all offsite and onsite AC power sources; and b. A worst case single failure. Battery cell parameters satisfy the Criterion 3 of the NRC Policy Statement.
LCO	Battery cell parameters must remain within acceptable limits to ensure availability of the required DC power to shut down the reactor and maintain it in a safe condition after an anticipated operational occurrence or a postulated DBA. Electrolyte limits are conservatively established, allowing continued DC electrical system function even with Category A and B limits not met.

(continued)

BASES (continued)

APPLICABILITY

The battery cell parameters are required solely for the support of the associated DC electrical power subsystems. Therefore, battery electrolyte is only required when the DC power source is required to be OPERABLE. Refer to the Applicability discussion in Bases for LCO 3.8.1, and LCO 3.8.2.

ACTIONS

A.1, A.2, and A.3

With one or more cells in one or more Divisions not within limits (i.e., Category A limits not met, Category B limits not met, or Category A and B limits not met) but within the Category C limits specified in Table 3.8.7-1 in the accompanying LCO, the battery is degraded but there is still sufficient capacity to perform the intended function. Therefore, the affected battery is not required to be considered inoperable solely as a result of Category A or B limits not met and operation is permitted for a limited period.

The pilot cell electrolyte level and float voltage are required to be verified to meet the Category C limits within 1 hour (Required Action A.1). This check will provide a quick indication of the status of the remainder of the battery cells. One hour provides time to inspect the electrolyte level and to confirm the float voltage of the pilot cells. One hour is considered a reasonable amount of time to perform the required verification.

Verification that the Category C allowable limits are met (Required Action A.2) provides assurance that during the time needed to restore the parameters to the Category A and B limits, the battery will still be capable of performing its intended function. A period of 24 hours is allowed to complete the required verification because specific gravity measurements must be obtained for each connected cell. Taking into consideration the time required to perform the required verification and the assurance that the battery cell parameters are not severely degraded, this time is considered reasonable. The verification is repeated at 7 day intervals until the parameters are restored to Category A or B limits. This periodic verification is consistent with the normal Frequency of pilot cell Surveillances.

(continued)

BASES

ACTIONS

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

Continued operation is only permitted for 31 days before battery cell parameters must be restored to within Category A and B limits. With the consideration that, while battery capacity is degraded, sufficient capacity exists to perform the intended function and allow time to fully restore the battery cell parameters to normal limits, this time is acceptable prior to declaring the battery inoperable.

B.1

With one or more batteries with one or more battery cell parameters outside the Category C limit for any connected cell, sufficient capacity to supply the maximum expected load requirement is not assured and the corresponding DC electrical power subsystem must be declared inoperable. Additionally, other potentially extreme conditions, such as not completing the Required Actions of Condition A within the required Completion Time or average electrolyte temperature of representative cells falling below [60°F], are also cause for immediately declaring the associated DC electrical power subsystem inoperable.

SURVEILLANCE REQUIREMENTS

SR 3.8.7.1

This SR verifies that the Category A battery cell parameters are consistent with IEEE-450 (Ref. 2), which recommends regular battery inspections (at least one per month) including voltage, specific gravity, and electrolyte temperature of pilot cells.

SR 3.8.7.2

The quarterly inspection of specific gravity and voltage is consistent with IEEE 450 (Ref. 2). In addition, within 24 hours of a battery discharge < [110] V or a battery overcharge > [150] V, the battery must be demonstrated to meet Category B limits. Transients, such as motor starting transients, which may momentarily cause battery voltage to drop to ≤ [110] V, do not constitute a battery discharge provided the battery terminal voltage and float current return to pre-transient values. This inspection is also

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.8.7.2 (continued)

consistent with IEEE 450 (Ref. 2), which recommends special inspections following a severe discharge or overcharge, to ensure that no significant degradation of the battery occurs as a consequence of such discharge or overcharge.

SR 3.8.7.3

This Surveillance verification that the average temperature of representative cells is > [60°F] is consistent with a recommendation of IEEE-450 (Ref. 2). IEEE-450 (Ref. 2) states that pilot cell temperature of electrolytes in representative cells should be determined on a quarterly basis.

Lower than normal temperatures act to inhibit or reduce battery capacity. This SR ensures that the operating temperatures remain within an acceptable operating range. This limit is based on manufacturer recommendations.

Table 3.8.7-1

This Table delineates the limits on electrolyte level, float voltage, and specific gravity for three different categories. The meaning of each category is discussed below.

Category A defines the normal parameter limit for each designated pilot cell in each battery. The cells selected as pilot cells are those whose temperature, voltage and electrolyte specific gravity approximate the state of charge of the entire battery.

The Category A limits specified for electrolyte level are based on manufacturer recommendations and are consistent with the guidance in IEEE-450 (Ref. 2), with the extra 1/4 inch allowance above the high water level indication for operating margin to account for temperatures and charge effects. In addition to this allowance, a footnote to Table 3.8.7-1 permits the electrolyte level to be above the specified maximum level during equalizing charge, provided it is not overflowing. These limits ensure that the plates suffer no physical damage, and that adequate electron transfer capability is maintained in the event of transient

(continued)

BASES

SURVEILLANCE REQUIREMENTS

Table 3.8.7-1 (continued)

conditions. IEEE-450 (Ref. 2) recommends that electrolyte level readings should be made only after the battery has been at float charge for at least 72 hours.

The Category A limit specified for float voltage is ≥ 2.13 V per cell. This value is based on the recommendations of IEEE-450 (Ref. 2), which state that prolonged operation of cells < 2.13 V can reduce the life expectancy of cells.

The Category A limit specified for specific gravity for each pilot cell is > [TBD] (0.015 below the manufacturer fully charged nominal specific gravity or a battery charging current that had stabilized at a low value). This value is characteristic of a charged cell with adequate capacity. According to IEEE-450 (Ref. 2), the specific gravity readings are based on a temperature of 77°F (25°C).

The specific gravity readings are corrected for actual electrolyte temperature and level. For each 3°F (1.67°C) above 77°F (25°C), 1 point (0.001) is added to the reading; 1 point is subtracted for each 3°F below 77°F. The specific gravity of the electrolyte in a cell will increase with a loss of water due to electrolysis or evaporation.

Category B defines the normal parameter limits for each connected cell. The term "connected cell" excludes any battery cell that may be jumpered out.

The Category B limits specified for electrolyte level and float voltage are the same as those specified for Category A and have been discussed above. The Category B limit specified for specific gravity for each connected cell is ≥ [TBD] (0.020 below the manufacturer fully charged, nominal specific gravity) with the average of all connected cells > [TBD] (0.010 below the manufacturer fully charged, nominal specific gravity). These values are based on manufacturer's recommendations. The minimum specific gravity value required for each cell ensures that the effects of a highly charged or newly installed cell will not mask overall degradation of the battery.

Category C defines the limits for each connected cell. These values, although reduced, provide assurance that sufficient capacity exists to perform the intended function

(continued)

BASES

SURVEILLANCE REQUIREMENTS

Table 3.8.7-1 (continued)

and maintain a margin of safety. When any battery parameter is outside the Category C limits, the assurance of sufficient capacity described above no longer exists, and the battery must be declared inoperable.

The Category C limits specified for electrolyte level (above the top of the plates and not overflowing) ensure that the plates suffer no physical damage and maintain adequate electron transfer capability. The Category C limits for float voltage is based on IEEE-450 (Ref. 2), which states that a cell voltage of 2.07 V or below, under float conditions and not caused by elevated temperature of the cell, indicates internal cell problems and may require cell replacement.

The Category C limit of average specific gravity ≥ [TBD] is based on manufacturer recommendations (0.020 below the manufacturer recommended fully charged, nominal specific gravity). In addition to that limit, it is required that the specific gravity for each connected cell must be no less than 0.020 below the average of all connected cells. This limit ensures that the effect of a highly charged or new cell does not mask overall degradation of the battery. Within 7 days each connected cell specific gravity must be measured to confirm the state of change. Following a minor battery recharge, (such as a equalizing charge that does not follow a deep discharge) specific gravity gradients are not significant, and confirming measurements may be made in less than 7 days.

The footnotes to Table 3.8.7-1 are applicable to Category A, B, and C specific gravity. Footnote (b) to Table 3.8.7-1 requires the above mentioned correction for electrolyte level and temperature, with the exception that level correction is not required when battery charging current is < [TBD] amps on float charge. This current provides, in general, an indication of overall battery condition.

Because of specific-gravity gradients that are produced during the recharging process, delays of several days may occur while waiting for the specific gravity to stabilize. A stabilized charger is an acceptable alternative to specific gravity measurement for determining the state of charge. This phenomenon is discussed in IEEE-450 (Ref. 2).

(continued)

BASES

SURVEILLANCE REQUIREMENTS

Table 3.8.7-1 (continued)

Footnote (c) to Table 3.8.7-1 allows the float charge current to be used as an alternate to specific gravity for up to [7] days following a battery recharge. Within [7] days, each connected cell's specific gravity must be measured to confirm the state of charge. Following a minor battery recharge (such as equalizing charge that does not follow a deep discharge) specific gravity gradients are not significant, and confirming measurements may be made in less than [7] days.

REFERENCES

1. (Battery Manufacturer recommended parameter values).
2. IEEE-450 1987, "IEEE Recommended Practice for Maintenance, Testing, and Replacement of Large Lead Storage Batteries for Generating Stations and Substations."
3. IEEE-308 1980, "IEEE Standard Criteria for Class 1E Power Systems for Nuclear Power Generating Stations."
4. Chapter 6, "Engineered Safety Features."
5. Chapter 15, "Accident Analyses."

B 3.9 REFUELING OPERATIONS

B 3.9.1 Boron Concentration

BASES

BACKGROUND

The limit on the boron concentration of the Reactor Coolant System (RCS), the refueling cavity, and the transfer tube during refueling ensures that the reactor remains subcritical during MODE 6. Refueling boron concentration is the soluble boron concentration in the coolant in each of these volumes having direct access to the reactor core during refueling.

The soluble boron concentration offsets the core reactivity and is measured by chemical analysis of a representative sample of the coolant in each of the volumes. The refueling boron concentration limit is specified in the COLR. Plant procedures ensure the specified boron concentration in order to maintain an overall core reactivity of $k_{eff} \leq 0.95$ during fuel handling with control rods and fuel assemblies assumed to be in the most adverse configuration (least negative reactivity) allowed by procedures.

The reactor is brought to shutdown conditions before beginning operations to open the reactor vessel for refueling. After the RCS is cooled down and depressurized, the vessel head is unbolted and slowly removed. The refueling cavity and the fuel transfer canal are then flooded with borated water from the In-containment Refueling Water Storage Tank (IRWST) by the use of the Spent Fuel Pool Cooling System (SFS).

During refueling, the water volumes in the RCS, the fuel transfer canal and the refueling cavity are contiguous. However, the soluble boron concentration is not necessarily the same in each volume. If additions of boron are required during refueling, the Chemical and Volume Control System (CVS) provides the borated makeup.

The pumping action of the Normal Residual Heat Removal System (RNS) in the RCS, the SFS pumps in the spent fuel pool and refueling cavity, and the natural circulation due to thermal driving heads in the reactor vessel and refueling cavity mix the added concentrated boric acid with the water in the fuel transfer canal. The RNS is in operation during

(continued)

BASES

BACKGROUND (continued)	refueling to provide forced circulation in the RCS, while the SFS is in operation to cool and purify the spent fuel pool and refueling cavity. Their operation assists in maintaining the boron concentration in the RCS, the refueling cavity, and fuel transfer canal above the COLR limit.
APPLICABLE SAFETY ANALYSES	The boron concentration limit, specified in the COLR, is based on the core reactivity at the beginning of each fuel cycle (the end of refueling) and includes an uncertainty allowance. The required boron concentration and the plant refueling procedures that verify the correct fuel loading plan (including full core mapping) ensure that the k_{eff} of the core will remain ≤ 0.95 during the refueling operation. Hence, at least a 5% $\Delta k/k$ margin of safety is established during refueling. The RCS boron concentration satisfies Criterion 2 of the NRC Policy Statement.
LCO	The LCO requires that a minimum boron concentration be maintained in the RCS, the refueling cavity and the transfer tube while in MODE 6. The boron concentration limit specified in the COLR ensures that a core $k_{eff} \leq 0.95$ is maintained during fuel handling operations. Violation of the LCO could lead to an inadvertent criticality during MODE 6.
APPLICABILITY	This LCO is applicable in MODE 6 to ensure that the fuel in the reactor vessel will remain subcritical. The required boron concentration ensures a k_{eff} of ≤ 0.95. Above MODE 6, LCO 3.1.1, "SHUTDOWN MARGIN (SDM)" ensures that an adequate amount of negative reactivity is available to shut down the reactor and maintain it subcritical.

(continued)

BASES (continued)

ACTIONS

A.1 and A.2

Continuation of CORE ALTERATIONS or positive reactivity additions (including actions to reduce boron concentration) is contingent upon maintaining the plant in compliance with the LCO. If the boron concentration of any coolant volume in the RCS, the refueling cavity, or the fuel transfer canal is less than its limit, all operations involving CORE ALTERATIONS or positive reactivity additions must be suspended immediately.

Suspension of CORE ALTERATIONS and positive reactivity additions shall not preclude completion of actions to establish a safe condition, including moving a component to a safe position.

A.3

In addition to immediately suspending CORE ALTERATIONS or positive reactivity additions, boration to restore the concentration must be initiated immediately.

In determining the required combination of boration flow rate and concentration, no unique design basis accident (DBA) must be satisfied. The only requirement is to restore the boron concentration to its required value as soon as possible. In order to raise the boron concentration as soon as possible, the operator shall begin boration with the best source available for plant operations.

Once boration is initiated, it must be continued until the boron concentration is restored. The restoration time depends on the amount of boron that must be injected to reach the required concentration.

SURVEILLANCE REQUIREMENTS

SR 3.9.1.1

This SR verifies that the coolant boron concentration in the RCS, the refueling cavity and the fuel transfer canal is within the COLR limit. The boron concentration of the coolant in each volume is determined periodically by chemical analysis.

(continued)

BASES

SURVEILLANCE REQUIREMENTS	SR 3.9.1.1 (continued) A minimum Frequency of once every 72 hours is a sufficient interval to verify the boron concentration. The surveillance interval is based on operating experience, isolation of unborated water sources in accordance with LCO 3.9.2, and the availability of the source range neutron flux monitors required by LCO 3.9.3.
REFERENCES	1. Chapter 15, "Accident Analysis." 2. NS-57.2, ANSI/ANS-57.2-1983, Section 6.4.2.2.3, American Nuclear Society, American National Standard, "Design Requirements for Light Water Reactor Spent Fuel Storage Facilities at Nuclear Power Plants," 1983.

B 3.9 REFUELING OPERATIONS

B 3.9.2 Unborated Water Source Flow Paths

BASES

BACKGROUND	During MODE 6 operation, all flow paths for reactor makeup water sources containing unborated water which are connected to the Reactor Coolant System (RCS) must be closed to prevent an unplanned dilution of the reactor coolant. At least one isolation valve in each flow path must be secured in the closed position. The Chemical and Volume Control System is capable of supplying borated and unborated water to the RCS through various flow paths. Since a positive reactivity addition, made by reducing the boron concentration, is inappropriate during MODE 6, isolation of all unborated water sources prevents an unplanned boron dilution event.
APPLICABLE SAFETY ANALYSES	The possibility of an unplanned boron dilution event (Ref. 1) in MODE 6 is precluded by adherence to this LCO which requires that potential dilution sources be isolated. Closing the required valves during refueling operations prevents the flow of unborated water to the filled portions of the RCS. The valves are used to isolate unborated water sources. These valves have the potential to indirectly allow dilution of the RCS boron concentration in MODE 6. By isolating unborated water sources, a safety analysis for an uncontrolled boron dilution accident in accordance with the Standard Review Plan (Ref. 2) is not required in MODE 6. The RCS boron concentration satisfies Criterion 2 of the NRC Policy Statement.
LCOs	This LCO requires that flow paths to the RCS from unborated water sources be isolated to prevent unplanned boron dilution during MODE 6 and, thus, avoid a reduction in SHUTDOWN MARGIN.

(continued)

BASES (continued)

APPLICABILITY

In MODE 6, this LCO is applicable to prevent an unplanned boron dilution event by ensuring isolation of all sources of unborated water to the RCS.

In MODES 1 through 5, the requirements of LCO 3.1.9, "Chemical and Volume Control System (CVS) Demineralized Water Isolation Valves," apply.

ACTIONS

The ACTIONS Table has been modified by a Note which allows separate Condition entry for each unborated water source flow path.

A.1

Continuation of CORE ALTERATIONS is contingent upon maintaining the plant in compliance with this LCO. With any valve used to isolate unborated water sources not secured in the closed position, all operations involving CORE ALTERATIONS must be suspended immediately. The Completion Time of "Immediately" shall not preclude completion of actions to establish a safe condition, including movement of a component to a safe location.

Condition A has been modified by a Note to require that Required Action A.3 must be completed whenever Condition A is entered.

A.2

Preventing unplanned dilution of the reactor coolant boron concentration is dependent on maintaining the unborated water isolation valves secured closed. Securing the valves in the closed position verifies that the valves cannot be inadvertently opened. The Completion Time of "Immediately" requires an operator to initiate actions to close an open valve and secure the isolation valve in the closed position immediately. Once actions are initiated, they must be continued until the valves are secured in the closed position.

A.3

Due to the potential of having diluted the boron concentration of the reactor coolant, SR 3.9.1.1

(continued)

BASES

ACTIONS	A.3 (continued) (verification of boron concentration) must be performed whenever Condition A is entered to verify that the required boron concentration exists. The Completion Time of 4 hours is sufficient to obtain and analyze a reactor coolant sample for boron concentration.
SURVEILLANCE REQUIREMENTS	SR 3.9.2.1 These valves are to be secured closed to isolate possible dilution flow paths. The likelihood of a significant reduction in the boron concentration during MODE 6 operations is remote due to the large mass of borated water in the refueling cavity and the fact that all unborated water source flow paths are isolated, precluding a dilution. The boron concentration is checked every 31 days during MODE 6 under SR 3.9.1.1. This surveillance demonstrates that the valves are closed through a system walkdown. The 31 day Frequency is based on engineering judgement and is considered reasonable in view of other administrative controls that will verify that the valve opening is an unlikely possibility.
REFERENCES	1. Chapter 15, "Accident Analyses." 2. NUREG-0800, Standard Review Plan, Section 15.4.6, "Chemical and Volume Control System Malfunction that Results in a Decrease in Boron Concentration in the RCS."

B 3.9 REFUELING OPERATIONS

B 3.9.3 Nuclear Instrumentation

BASES

BACKGROUND	The source range neutron flux monitors are used to monitor the core reactivity during refueling operations. The source range neutron flux monitors are part of the Protection and Safety Monitoring System (PMS). These detectors are located external to the reactor vessel and detect neutrons leaking from the core. The source range neutron flux monitors are BF3 detectors operating in the proportional region of the gas filled detector characteristic curve. The detectors monitor the neutron flux in counts per second. The instrument range covers six decades of neutron flux ($1x10^{+6}$cps) with a 5% instrument accuracy. The detectors also provide continuous visual and audible indication in the main control room and an audible alarm in the main control room and containment building.
APPLICABLE SAFETY ANALYSES	Two OPERABLE source range neutron flux monitors are required to provide a signal to alert the operator to unexpected changes in core reactivity such as those associated with an improperly loaded fuel assembly. During initial fuel loading, or when otherwise required, temporary neutron detectors may be used to provide additional reactivity monitoring (Ref. 2). The potential for an uncontrolled boron dilution accident is eliminated by isolating all unborated water sources as required by LCO 3.9.2 (Ref. 1). The source range neutron flux monitors satisfy Criterion 3 of the NRC Policy Statement.
LCO	This LCO requires two source range neutron flux monitors to be OPERABLE to ensure that redundant monitoring capability is available to detect changes in core reactivity.

(continued)

BASES (continued)

APPLICABILITY

In MODE 6, the source range neutron flux monitors are required to be OPERABLE to determine possible changes in core reactivity. There are no other direct means available to monitor the core reactivity conditions. In MODES 2, 3, 4, and 5, the source range detectors and associated circuitry are also required to be OPERABLE by LCO 3.3.1, "Reactor Trip System Instrumentation."

ACTIONS

A.1 and A.2

Redundancy has been lost if only one source range neutron flux monitor is OPERABLE. Since these instruments are the only direct means of monitoring core reactivity conditions, CORE ALTERATIONS and positive reactivity additions must be suspended immediately. Performance of Required Action A.1 shall not preclude completion of actions to establish a safe condition.

B.1

If no source range neutron flux monitors are OPERABLE, actions to restore a monitor to OPERABLE status shall be initiated immediately. Once initiated, actions shall be continued until a source range neutron flux monitor is restored to OPERABLE status.

B.2

If no source range neutron flux monitors are OPERABLE, there is no direct means of detecting changes in core reactivity. However, since CORE ALTERATIONS and positive reactivity additions are discontinued, the core reactivity condition is stabilized and no changes are permitted until the source range neutron flux monitors are restored to OPERABLE status. This stable condition is confirmed by performing SR 3.9.1.1 to verify that the required boron concentration exists.

The Completion Time of 4 hours is sufficient to obtain and analyze a reactor coolant sample for boron concentration. The Frequency of once per 12 hours ensures that unplanned changes in boron concentration would be identified. The 12 hour Frequency is reasonable considering the low probability of a change in core reactivity during this time period.

(continued)

BASES (continued)

SURVEILLANCE REQUIREMENTS

SR 3.9.3.1

SR 3.9.3.1 is the performance of a CHANNEL CHECK, which is the comparison of the indicated parameter values monitored by each of these instruments. It is based on the assumption that the two indication channels should be consistent for the existing core conditions. Changes in core geometry due to fuel loading can result in significant differences between the source range channels, however each channel should be consistent with its local conditions.

The Frequency of 12 hours is consistent with the CHANNEL CHECK Frequency specified for these same instruments in LCO 3.3.1, "Reactor Trip System Instrumentation."

SR 3.9.3.2

SR 3.9.3.2 is the performance of a CHANNEL CALIBRATION every 24 months. This SR is modified by a Note stating that neutron detectors are excluded from the CHANNEL CALIBRATION. The CHANNEL CALIBRATION for the source range neutron flux monitors consisting of obtaining the detector plateau or preamp discriminator curves, evaluating those curves, and comparing the curves to the manufacturer's data. The 24 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage. Operating experience has shown these components usually pass the Surveillance when performed during the refueling outage.

REFERENCES

1. Chapter 15, "Accident Analysis."
2. Section 14.2.6.1, "Initial Fuel Loading."

B 3.9 REFUELING OPERATIONS

B 3.9.4 Refueling Cavity Water Level

BASES

BACKGROUND	The movement of irradiated fuel assemblies or performance of CORE ALTERATIONS, except during latching and unlatching of control rod drive shafts, within containment requires a minimum water level of 23 ft. above the top of the reactor vessel flange. During refueling, this maintains sufficient water level in containment, refueling cavity, refueling canal, fuel transfer canal, and spent fuel pool to retain iodine fission product activity in the event of a fuel handling accident (Ref. 1 and 2). Sufficient iodine activity would be retained to limit offsite doses from the accident to within the values reported in Chapter 15.
APPLICABLE SAFETY ANALYSES	During CORE ALTERATIONS and movement of irradiated fuel assemblies, the water level in the refueling cavity and the refueling canal is an initial condition design parameter in the analysis of a fuel-handling accident in containment, as postulated by Regulatory Guide 1.25 (Ref. 1). The fuel handling accident analysis inside containment is described in Reference 2. This analysis assumes a minimum water level of 23 feet. Refueling Cavity Water Level satisfies Criterion 2 of the NRC Interim Policy Statement.
LCO	A minimum refueling cavity water level of 23 ft. above the reactor vessel flange is required to ensure that the radiological consequences of a postulated fuel handling accident inside containment are within the values calculated in Reference 2.
APPLICABILITY	Refueling Cavity Water Level is applicable during CORE ALTERATIONS, except during latching and unlatching of control rod drive shafts, and when moving irradiated fuel assemblies in containment. The LCO minimizes the

(continued)

BASES

APPLICABILITY (continued)	possibility of radioactive release due to a fuel handling accident in containment that is beyond the assumptions of the safety analysis. If irradiated fuel assemblies are not being moved in containment, there can be no significant radioactivity release as a result of a postulated fuel handling accident. Requirements for fuel handling accidents in the spent fuel pool are covered by LCO 3.7.11, "Fuel Storage Pool Water Level."
ACTIONS	A.1 and A.2 With a water level of < 23 ft. above the top of the reactor vessel flange, all operations involving CORE ALTERATIONS or movement of irradiated fuel assemblies within containment shall be suspended immediately to ensure that a fuel handling accident cannot occur. The suspension of CORE ALTERATIONS and fuel movement shall not preclude completion of movement to safe position. A.3 In addition to immediately suspending CORE ALTERATIONS movement of irradiated fuel, actions to restore refueling cavity water level must be initiated immediately.
SURVEILLANCE REQUIREMENTS	SR 3.9.4 1 Verification of a minimum water level of 23 ft. above the top of the reactor vessel flange ensures that the design basis for the analysis of the postulated fuel handling accident during refueling operations is met. Water at the required level above the top of the reactor vessel flange limits the consequences of damaged fuel rods that are postulated to result from a fuel handling accident inside containment (Ref. 2). The Frequency of 24 hours is based on engineering judgement and is considered adequate in view of the large volume of water and the normal procedural controls of valve positions which make significant unplanned level changes unlikely.

(continued)

BASES (continued)

REFERENCES

1. Regulatory Guide 1.25, "Assumptions Used for Evaluating the Potential Radiological Consequences of a Fuel Handling Accident in the Fuel Handling and Storage Facility for Boiling and Pressurized Water Reactors," U.S. Nuclear Regulatory Commission, March 23, 1972.

2. Section 15.7.4, "Fuel Handling Accident."

B 3.9 REFUELING OPERATIONS

B 3.9.5 Containment Penetrations

BASES

BACKGROUND

During CORE ALTERATIONS or movement of irradiated fuel assemblies within containment, potential releases of fission product radioactivity within containment are monitored and filtered or are restricted from escaping to the environment when the LCO requirements are met. Monitoring of potential releases of radiation is performed in accordance with Administrative Controls Section 5.5.3, "Radioactive Effluent Control Program." In MODES 1, 2, 3, and 4, containment operability is addressed in LCO 3.6.1, "Containment." In MODES 5 and 6, closure capability of containment penetrations is addressed in LCO 3.6.8, "Containment Penetrations." Since there is no potential for containment pressurization due to a fuel handling accident, the Appendix J leakage criteria and tests are not required in MODES 5 and 6.

The containment serves to contain fission product radioactivity that may be released from the reactor core following an accident, such that offsite radiation exposures are maintained within the requirements of 10 CFR 50.34. For a fuel handling accident, the AP600 dose analysis does not rely on containment closure to meet the offsite radiation exposure limits. This LCO is provided as an additional level of defense against the possibility of a fission product release from a fuel handling accident.

The containment equipment hatches, which are part of the containment pressure boundary, provide a means for moving large equipment and components into and out of containment. During CORE ALTERATIONS or movement of irradiated fuel assemblies within containment, an equipment hatch is considered closed if the hatch cover is held in place by at least [four] bolts. Good engineering practice dictates that the bolts required by this LCO be approximately equally spaced.

(continued)

BASES

BACKGROUND (continued)

If the equipment hatch is open, an alternative barrier between the containment atmosphere and the outside atmosphere shall be in place. Each containment equipment hatch opens into a staging area in the auxiliary building. These staging areas contain doors that open to the radiologically controlled areas of the annex building. The annex building contains a door that opens to the outside atmosphere. The alternate barrier may consist of the staging area in the auxiliary building, or may consist of the staging areas in the auxiliary building and the radiologically controlled areas in the annex building provided the doors from the annex building to the outside atmosphere are closed. The alternate barrier may also consist of a temporary equipment hatch cover that provides equivalent isolation capability. The alternate boundary prevents the airborne fission products from being readily released to the atmosphere if the equipment hatches were open during a fuel handling accident.

If an equipment hatch is open during CORE ALTERATIONS or during movement of irradiated fuel assemblies within containment, the containment air filtration system (VFS) shall be OPERABLE, and at least one exhaust fan shall be operating to provide for monitoring of air-borne radioactivity. This system services the containment, and upon detection of high radiation, also services the fuel handling area, the auxiliary building (including the staging areas), and the annex building. If high airborne radioactivity is detected in the area enclosed by the alternate barrier, the radiologically controlled area ventilation system (VAS) supply and exhaust duct isolation dampers automatically close to isolate the affected area from the outside environment, and the VAS exhaust is automatically aligned to the VFS exhaust subsystem. The operation of the VFS exhaust fans provides the system with the ability for monitoring of radioactivity releases from containment following a fuel handling accident and, if operating, will provide filtration of the containment atmosphere.

If a personnel air lock or spare containment penetration is open during CORE ALTERATIONS or during movement of irradiated fuel assemblies within containment, then the containment air filtration system (VFS) shall be OPERABLE

(continued)

BASES

BACKGROUND (continued)	and operating to monitor for the release of radioactivity and to provide filtration of the air inside containment. These penetrations open into the auxiliary building. Upon detection of high radiation in the exhaust air from the auxiliary building, VFS will provide filtered exhaust of these areas. Considering that these penetrations open into the auxiliary building and not directly to the atmosphere, and that the VFS is in operation, an alternate barrier to the release of radioactivity directly to the environment is provided.
APPLICABLE SAFETY ANALYSES	For the AP600, there are no safety analyses that require containment closure during CORE ALTERATIONS or movement of irradiated fuel assemblies within containment, other than those discussed in LCO 3.6.8. Fuel handling accidents, analyzed in Reference 1, include dropping a single irradiated fuel assembly and handling tool or a heavy object onto other irradiated fuel assemblies. The requirements of LCO 3.9.4, "Refueling Cavity Water Level," ensure that the release of fission product radioactivity, subsequent to a fuel handling accident, results in doses that are well within the guideline values specified in 10 CFR 50.34. Standard Review Plan, Section 15.7.4, Rev. 1 (Reference 2), defines "well within" to be 25% or less of the limiting dose guideline values. This specification is included as defense in depth as discussed in Reference 3.
LCO	This LCO provides defense-in-depth against the consequences of a fuel handling accident in containment by limiting the potential escape paths for fission product radioactivity released within containment. This LCO requires that if an equipment hatch, personnel air lock, or spare containment penetration is open during CORE ALTERATIONS or movement of irradiated fuel assemblies within containment, then the containment air filtration system (VFS) shall be OPERABLE and operating to monitor for the release of radioactivity and to provide filtration of the air inside containment.

(continued)

BASES

LCO (continued)

The VFS is OPERABLE when:

a. One VFS exhaust fan is operating; the associated HEPA filter and charcoal adsorber are not excessively restricting flow, and are capable of performing their filtration function; and air circulation can be maintained;

b. An alternative barrier between the containment atmosphere and the outside atmosphere is in place. The alternate barrier may consist of the staging area in the auxiliary building, or may consist of the staging areas in the auxiliary building and the radiologically controlled areas in the annex building provided the doors from the annex building to the outside atmosphere are closed.

   Doors in the alternate barrier which are normally closed may be opened for short periods of time for ingress and egress. The alternate barrier may also consist of a temporary equipment hatch cover that provides equivalent isolation capability.

APPLICABILITY

The containment penetration requirements are applicable during CORE ALTERATIONS or movement of irradiated fuel assemblies within containment because this is when there is a potential for a fuel handling accident. In MODES 1, 2, 3, and 4, containment penetration requirements are addressed by LCO 3.6.1. In MODES 5 and 6, when CORE ALTERATIONS or movement of irradiated fuel assemblies within containment are not being conducted, the potential for a fuel handling accident does not exist. Containment closure capability in MODES 5 and 6 are addressed by LCO 3.6.8.

ACTIONS

A.1 and A.2

The required status for the containment equipment hatch, air locks or spare penetration is either closed, or open with the VFS OPERABLE and operating. The required status for the containment penetrations that provide direct access from the containment atmosphere to the outside atmosphere is either closed by a manual or automatic isolation valve, blind

(continued)

BASES

ACTIONS

A.1 and A.2 (continued)

flange or equivalent, or capable of being closed by an OPERABLE Containment Isolation Signal. If the containment equipment hatch or air locks, or any containment penetration that provides direct access from the containment atmosphere to the outside atmosphere is not in the required status, the unit must be placed in a condition where the isolation function is not needed. This is accomplished by immediately suspending CORE ALTERATIONS and movement of irradiated fuel assemblies within containment. Performance of these actions shall not preclude completion of movement of a component to a safe position.

SURVEILLANCE REQUIREMENTS

SR 3.9.5 1

This Surveillance verifies that each of the containment penetrations required to be in its closed position is in that position or the VFS is OPERABLE and operating. For the VFS to be considered OPERABLE, this surveillance also requires that an alternate barrier is in place.

SR 3.9.5.2

This Surveillance demonstrates that each containment purge and exhaust valve actuates to its isolation position on manual initiation. The Surveillance on the open purge and exhaust valves will demonstrate that the valves are not blocked from closing. The Frequency is in accordance with the Inservice Testing Program.

SR 3.9.5.3

This SR verifies the ability of the VFS to maintain a negative pressure ($\leq$ [-0.125] inches water gauge relative to outside atmospheric pressure) in the containment and the portions of the auxiliary and/or annex building that comprise the envelope defined as the alternate barrier. This surveillance is performed with the VFS in containment operating. Doors in the alternate barrier which are normally closed may be opened for ingress and egress. The portion of the VAS which services the area enclosed by the alternate barrier is aligned to the VFS exhaust subsystem,

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.9.5.3 (continued)

and the VAS auxiliary/annex building supply fans and VFS containment purge supply fans not operating. The Frequency of 24 months is consistent with the guidance provided in NUREG-0800, Section 6.5.1 (Ref. 4).

SR 3.9.5.4

The VFS should be checked periodically to ensure that it functions properly. As the operating conditions on this system are not severe, testing each train within 31 days prior to fuel movement provides an adequate check on this system. Operation of the heater dries out any moisture accumulated in the charcoal from humidity in the ambient air.

REFERENCES

1. Section 15.7.4, "Fuel Handling Accident."
2. NUREG-0800, Section 15.7.4, Rev. 1, July 1981.
3. NRC Request for Additional Information (RAI) 480.1159F.
4. NUREG-0800, Section 6.5.1, Rev. 2, July 1981.

B 3.9 REFUELING OPERATIONS

B 3.9.6 Containment Air Filtration System (VFS)

BASES

BACKGROUND

The radiologically controlled area ventilation system (VAS) serves the fuel handling area of the auxiliary building, and the radiologically controlled portions of the auxiliary and annex buildings, except for the health physics and hot machine shop areas which are provided with a separate ventilation system (VHS). If high airborne radioactivity is detected in the exhaust air from the fuel handling area, the auxiliary building, or the annex buildings, the VAS supply and exhaust duct isolation dampers automatically close to isolate the affected area from the outside environment and the containment air filtration exhaust subsystem starts. The VFS exhaust subsystem prevents exfiltration of unfiltered airborne radioactivity by maintaining the isolated zone at ≤ [-0.125] inches water gauge pressure relative to the outside atmosphere. Monitoring of potential releases of radiation is performed in accordance with Administrative Controls Section 5.5.3, "Radioactive Effluent Control Program."

For a fuel handling accident, the AP600 dose analysis does not rely on the OPERABILITY of the VAS or VFS exhaust subsystem to meet the offsite radiation exposure limits. This LCO is provided as an additional level of defense-in-depth against the possibility of a fission product release from a fuel handling accident in the fuel building. The plant vent radiation detectors monitor effluents discharged from the plant vent to the environment.

Each VFS exhaust subsystem includes one 100 percent capacity exhaust air filtration unit, and the associated exhaust fan, heater and ductwork.

The filtration units are connected to a ducted system with isolation dampers to provide HEPA filtration and charcoal adsorption of exhaust air from the containment, fuel handling area, radiologically controlled areas of the auxiliary and annex buildings. A gaseous radiation monitor is located downstream of the exhaust air filtration units to

(continued)

BASES

BACKGROUND (continued)	provide an alarm if abnormal gaseous releases are detected. The plant vent exhaust flow is monitored for gaseous, particulate and iodine releases to the environment. During conditions of abnormal airborne radioactivity in the fuel handling area, auxiliary and/or annex buildings, the VFS exhaust subsystem provides filtered exhaust to minimize unfiltered offsite releases. The VAS is described in Reference 1 and the VFS is described in Reference 2.
APPLICABLE SAFETY ANALYSES	The VFS is not required to mitigate the consequences of the limiting Design Basis Accident (DBA), which is a fuel handling accident. The analysis of the fuel handling accident, given in Reference 3, assumes that all fuel rods in an assembly are damaged. The DBA analysis of the fuel handling accident does not assume that the VFS provides a filtered exhaust, and its operation would reduce the consequences of the fuel handling accident. This specification is included for defense-in-depth as discussed in Reference 6.
LCO	One VFS exhaust subsystem is required to be OPERABLE to reduce the consequences of a fuel handling accident by filtering the fuel building atmosphere. A VFS exhaust subsystem is considered OPERABLE when its associated: a. Exhaust fan is capable of operating; b. HEPA filter and charcoal adsorber are not excessively restricting flow, and are capable of performing their filtration function; c. The associated heater and ductwork are capable of operating.

(continued)

BASES (continued)

APPLICABILITY

During movement of irradiated fuel in the fuel handling area, one VFS exhaust subsystem is OPERABLE to alleviate the potential consequences of a fuel handling accident.

ACTIONS

A.1

When the required VFS exhaust subsystem is inoperable during movement of irradiated fuel assemblies in the fuel building, action must be taken to place the unit in a condition in which the LCO does not apply. Action must be taken immediately to suspend movement of irradiated fuel assemblies in the fuel building. This does not preclude the movement of fuel to a safe position.

SURVEILLANCE REQUIREMENTS

SR 3.9.6 1

Each VFS exhaust subsystem should be checked 31 days prior to fuel movement in the fuel handling area to ensure that it functions properly. As the operating conditions on this subsystem are not severe, testing each subsystem within one month prior to fuel movement provides an adequate check on this system. Operation of the heater dries out any moisture accumulated in the charcoal from humidity in the ambient air.

SR 3.9.6.2

This SR verifies that the VAS fuel handling area subsystem aligns to the VFS and that the VFS exhaust subsystem starts and operates on an actual or simulated actuation signal. During the post-accident mode of operation, the VAS fuel handling area subsystem aligns to the VFS filtered exhaust subsystem. The 24 month Frequency is consistent with Reference 4.

SR 3.9.6.3

This SR verifies the integrity of the fuel handling area of the auxiliary building enclosure. The ability of the VAS and VFS to maintain negative pressure ($\leq$ [-0.125] inches water gauge relative to outside atmospheric pressure) in the

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.9.6 3 (continued)

fuel handling area of the auxiliary building is periodically tested to verify proper function of the VAS and VFS exhaust subsystem. During this surveillance, the VAS fuel handling area subsystem is aligned to the operating VFS exhaust subsystem. The fan for the VAS fuel handling area subsystem is off. In this configuration, the VFS exhaust subsystem is designed to maintain a negative pressure in the fuel handling area of the auxiliary building (≤ [-0.125] inches water gauge relative to outside atmospheric pressure), to prevent unfiltered and unmonitored leakage. Doors may be opened for short periods of time to allow ingress and egress. During this surveillance, the VAS may be servicing the remaining portions of the auxiliary and annex buildings. The Frequency of 24 months is consistent with the guidance provided in NUREG-0800, Section 6.5.1 (Ref. 5).

REFERENCES

1. Section 9.4.3, "Radiologically Controlled Area Ventilation System."
2. Section 9.4.7, "Containment Air Filtration System."
3. Section 15.7.4, "Fuel Handling Accident."
4. Regulatory Guide 1.52 (Rev. 2).
5. NUREG-0800, Section 6.5.1, Rev. 2, July 1981.
6. NRC Request for Additional Information (RAI) 480.1159F.