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SOUTHERN COMPANY
Energy to Serve Your World℠

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NEL-00-0212

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

Joseph M. Farley Nuclear Plant
Request For Technical Specification Changes
Unit Two Pressurizer Power Operated Relief Valve Block Valves Surveillance Testing

Ladies and Gentlemen:

In accordance with the provisions of 10 CFR 50.90, Southern Nuclear Operating Company (SNC) proposes to amend the Farley Nuclear Plant (FNP) Technical Specifications (TS), Appendix A to Operating License NPF-8. This TS amendment request eliminates the requirement to cycle the Unit Two Pressurizer Power Operated Relief Valve (PORV) block valves during the remainder of operating cycle 14 and provides additional compensatory action. During cycle 14 the PORV block valves have previously been successfully cycled for surveillance testing purposes three times. Cycle 14 is presently scheduled to end on February 24, 2001.

Surveillance Requirement (SR) 3.4.11.1 specifies that the PORV block valves be cycled on a 92 day frequency. This proposed change adds a note for SR 3.4.11.1 that states "Not required to be performed for Unit Two during the remainder of operating cycle 14." This change is needed as the result of excessive packing leakage from at least one of the Unit Two PORV block valves that occurs during valve stroking. Cycling the valves with this packing leakage could result in additional degradation of the valve packing potentially resulting in a forced unit shutdown. Repair of the valve packing would require the Unit to be shutdown and cooled down to establish conditions for the repair. This condition poses unnecessary risk associated with the shutdown and cooldown of the plant compared to the relatively low risk associated with non detection of PORV block valve failure that could result from suspension of the requirement to stroke the valves every 92 days. In addition, SR 3.4.11.4 is added to require that power to the Unit Two PORV block valves be checked to be available at least every 24 hours. This will provide additional assurance that the valves will stroke if demanded. These changes will only be in effect for the remainder of Unit Two cycle 14. If a plant shutdown and cooldown is required prior to the next refueling outage, the PORV block valve(s) will be repaired prior to plant restart. This item will be tracked as an NRC commitment.

Enclosure 1 provides a basis for the proposed changes. Enclosure 2 provides the basis for a determination that the proposed changes do not involve significant hazards considerations pursuant to 10 CFR 50.92. Enclosure 3 provides a markup of the proposed changes to the TS.

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Enclosure 4 provides the clean typed version of proposed changes to the TS. Enclosures 5 and 6 contain markups and clean typed copies of the associated TS Bases changes. The bases changes are submitted for information only and will be approved in accordance with the Farley Bases Control Program.

SNC requests that the NRC review and approve the proposed TS change prior to October 29, 2000 since that is the scheduled date for the next PORV block valve cycle test.

SNC has reviewed the proposed amendment pursuant to 10 CFR 50.92 and determined that it does not involve a significant hazards consideration. In addition, there is no significant increase in the amounts of effluents that may be released offsite, and there is no significant increase in individual or cumulative occupational radiation exposure. Consequently, the proposed amendment satisfies the criteria of 10 CFR 51.22 for categorical exclusion from the requirements for an environmental assessment and the human environment is not affected by this amendment.

A copy of the proposed changes has been sent to Dr. D. E. Williamson, the Alabama State Designee, in accordance with 10 CFR 50.91(b)(1).

Mr. D. N. Morey states that he is a vice president of SNC, and is authorized to execute this oath on behalf of SNC and that, to the best of his knowledge and belief, the facts set forth in this letter and enclosures are true.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY

D N Morey

Dave Morey

Sworn to and subscribed before me this 8th day of September 2000

Brenda Singleton

Notary Public

My Commission Expires: Oct. 3 2001

EWC/maf: 1PORVBV905AM.doc

Enclosures:

1. Basis for the TS Change
2. 10 CFR 50.92 Evaluation
3. Marked-Up Technical Specification Pages
4. Clean Typed Technical Specification Pages
5. Marked-Up Technical Specification Bases Pages
6. Clean Typed Technical Specification Bases Pages

cc: Southern Nuclear Operating Company
Mr. L. M. Stinson, General Manager - Farley

U. S. Nuclear Regulatory Commission, Washington, D. C.
Mr. L. M. Padovan, Licensing Project Manager – Farley

U. S. Nuclear Regulatory Commission, Region II
Mr. L. A. Reyes, Regional Administrator
Mr. T. P. Johnson, Senior Resident Inspector – Farley

Alabama Department of Public Health
Dr. D. E. Williamson, State Health Officer

Enclosure 1

Joseph M. Farley Nuclear Plant
Unit Two Pressurizer Power Operated Relief Valve Block Valves Surveillance Testing
Technical Specification Changes

Basis for the TS Change

Enclosure 1

Joseph M. Farley Nuclear Plant
Unit Two Pressurizer Power Operated Relief Valve Block Valves Surveillance Testing
Technical Specification Changes

Basis for the TS Change

Description of Changes:

The proposed technical specification TS change modifies Surveillance Requirement (SR) 3.4.11.1, for Unit Two only, such that it will not be required to be performed during the remainder of operating cycle 14. A note is added for SR 3.4.11.1 that states "Not required to be performed for Unit 2 for the remainder of operating cycle 14." In addition, a temporary TS SR 3.4.11.4 is added to provide compensatory action while SR 3.4.11.1 is suspended. This SR requires that power to the Unit Two PORV block valves be checked at least every 24 hours for the remainder of operating cycle 14.

Discussion:

SR 3.4.11.1 currently states "Perform a complete cycle of each block valve" with a frequency of 92 days. During the performance of this SR on July 29, 2000 indication of significant packing leakage from one or both of the two PORV block valves occurred. Both block valves were cycled during a brief period of time so that, with the available indications, it was unclear which valve was leaking. An evaluation was performed to determine the operability of the block valves. The conclusion was that the valves are operable since they are capable of performing their safety function with the leakage. The leakage occurs only during the brief period that the valve is neither fully open nor fully closed. The valves are currently fully open in their normal positions with no indicated leakage. If the valves are closed the valve seat lies between the RCS pressure and the packing. With the potential for packing leakage present, it is desirable that the valves not be cycled to prevent potential equipment damage. The PORV block valve packing leakoff lines are routed to the reactor coolant drain tank (RCDT). The leakage that occurred during the test conducted on July 29 pressurized the RCDT and caused the RCDT relief valve to lift. If the cycle test were conducted for the remaining two times scheduled during current operating cycle 14, the RCDT relief valve may again be lifted and could stick in the open position. Should that occur, the availability of the RCDT for normal functions would be lost. These functions include water collection from various valve and equipment leakoff lines including the reactor coolant pump (RCP) number 2 seals. The RCDT also provides level and temperature control for the pressurizer relief tank. Although none of these functions is required for reactor safety they are important for normal plant operation. It is the intent of the proposed change to eliminate the operational risk associated with continued cycle testing of the PORV block valves. The valves will be inspected and repaired during the upcoming Unit Two refueling outage. It is the opinion of SNC that the incremental risk imposed by maneuvering the plant to a cold shutdown condition to repair the PORV block valves exceeds the incremental risk associated with not cycle testing the PORV block valves for the remainder of cycle 14. Verification of power available to the PORV block valves will provide additional assurance that the valves will close if demanded.

Technical Basis

At least one of the two installed PORV block valves has significant packing leakage when it is not in the fully open or fully closed position. The valves are presently in the normal fully open position with no indicated leakage. As discussed above, it is not clear which of the valves has packing leakage. SNC believes that additional stroking of the valves imposes a risk of further degradation of the packing in the affected valve due to either a galled stem rubbing the packing or steam cutting while the valve is being cycled.

Additional packing damage could result in the valves leaking while fully open. Should this occur, a plant shutdown and cooldown would be required to repair the valve. Therefore it is desired that the valves be left in the normal fully open position and not cycled for testing purposes.

The potential for impact of boron buildup in the valve leakoff has been evaluated. No indication exists of external leakage. The process fluid at the block valves is from the steam space in the pressurizer therefore the amount of boron is minimal. Further, should there be boron present in the process fluid the combination of the low boron concentration of the fluid and the high process temperature minimizes the potential for boron crystallization. Therefore, valve function is not impacted by potential boron buildup in the leakage path.

The PORV block valves have been demonstrated to be capable of closing if demanded. During cycle 14 they have previously been successfully cycled three times. The block valves are safety related and are in the FNP GL 89-10 program. Suspending the cycle testing of the valves as required by TS surveillance SR 3.4.11.1 will result in a slight decrease in the assurance that the PORV block valves would stroke closed if demanded. However, the history of the Farley PORV block valves indicates that they are highly reliable. The compensatory measure of verifying power available to the block valves on a 24-hour basis will improve assurance of valve reliability. Probabilistic risk analysis (PRA) cannot be used to model the proposed changes directly. The proposed changes are somewhat offsetting and neither can be adequately modeled to reflect a change in core damage frequency consistent with the current Farley PRA model. SNC believes that the change in core damage frequency associated with the proposed changes is very low.

One alternative to this proposed amendment is to continue to perform the cycle test as specified by TS surveillance SR 3.4.11.1. This would require two additional tests during the current operating cycle. It is the opinion of SNC that continuing to cycle test these valves may cause additional packing degradation that could result in packing leakage with the valve fully open. Such leakage can pose operational challenges, damage equipment, and increase radioactive waste. Should this occur, a plant shutdown and cooldown to repair the PORV block valve would be required.

Cycle testing the PORV block valves results in the potential for causing a pressure transient in the RCDT. This has occurred during previous testing of these valves. During the last performed cycle test of the PORV block valves the RCDT relief valve lifted. While the valve reseated, there is some potential for this relief valve to stick in the open position. Should this occur, usage of the RCDT for normal operational purposes is lost. The RCDT serves as a collection point for various leakoff lines along with the leakoff from the reactor coolant pumps number 2 seals. The RCDT is also used for level and temperature control of the pressurizer relief tank. The RCDT relief valve being stuck open could also result in normal plant leakage being released to the containment atmosphere increasing offsite dose and radioactive waste release.

The risk associated with shutting down and cooling the plant to repair the PORV block valve packing, while not quantifiable, is recognized to be higher than the risk associated with suspending cycle testing of the PORV block valves. A mid-cycle shutdown to repair this valve would also result in additional personnel radiation exposure. In addition, the potential operational impact of continuing to cycle test the PORV block valves is substantial. Therefore, SNC believes that the lowest risk option is to suspend cycle testing of the PORV block valves for the remainder of cycle 14 and the risk associated with the proposed change is acceptably low.

Summary

At least one of the two installed PORV block valves has significant packing leakage when it is not in the fully open or fully closed position. The proposed TS change modifies Surveillance Requirement 3.4.11.1 such that performance of cycle testing of the PORV block valves for Unit Two during the remainder of operating cycle 14 is suspended. Continuing to perform cycle testing of the block valves could result in additional damage to the PORV block valve packing thus creating conditions that would require a plant shutdown and cooldown. SNC has concluded that the additional risk associated with plant shutdown is greater than that of continuing to operate without performing the cycle test required by TS SR 3.4.11.1. In addition, new SR 3.4.11.4 is added to provide compensatory action while SR 3.4.11.1 is suspended. This requires that power be verified available to the PORV block valves at least each 24 hours.

Enclosure 2

Joseph M. Farley Nuclear Plant
Unit Two Pressurizer Power Operated Relief Valve Block Valves Surveillance Testing
Technical Specification Changes

10 CFR 50.92 Evaluation

Enclosure 2

Joseph M. Farley Nuclear Plant
Unit Two Pressurizer Power Operated Relief Valve Block Valves Surveillance Testing
Technical Specification Changes

10 CFR 50.92 Evaluation

Pursuant to 10 CFR 50.92, SNC has evaluated the proposed amendment and has determined that operation of the facility in accordance with the proposed amendment would not involve a significant hazards consideration. The basis for this determination is as follows:

1. The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

   The proposed change to Surveillance Requirement (SR) 3.4.11.1 suspends the requirement to cycle test the Unit Two pressurizer power operated relief valve (PORV) block valves for the remainder of operating cycle 14. This change will eliminate two scheduled cycle tests for the PORV block valves during the remainder of operating cycle 14. SR 3.4.11.4 is added to provide compensatory measures for verifying power available to the block valves at least every 24 hours. At the end of cycle 14, the proposed changes will no longer be in effect. Suspension of the cycle tests for the PORV block valves may result in a small decrease in assurance that the block valves would cycle if required to isolate a stuck open PORV. However, experience with these valves has shown them to be very reliable and suspension of the remaining tests will not appreciably reduce reliability of the valves. The proposed compensatory measure of verifying block valve power available on a 24 hour basis adds additional assurance that the block valves will close if demanded. Therefore, the probability of a previously evaluated accident remains acceptable.

   The proposed changes do not affect the consequences of a previously analyzed accident since the magnitude and duration of analyzed events are not impacted by this change. The dose consequences of the proposed change are bounded by LOCA analyses. Therefore, the consequences of a previously evaluated accident are unchanged.

   Therefore, the proposed TS changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

   The proposed changes involve no change to the physical plant. They allow for suspension of the PORV block valve cycle tests for a limited time and provide for compensatory action to verify power to the PORV block valves. These valves provide an isolation function for a postulated stuck open or leaking pressurizer PORV. This condition is an analyzed event since it is bounded by the FNP LOCA analyses. In addition to the isolation function, the block valves are required to remain open to allow the PORVs to function automatically to control reactor coolant system (RCS) pressure. These changes do not impact the open function of the block valves since the normal position is open.

Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed changes do not involve a significant reduction in a margin of safety.

The physical plant is unaffected by these changes. The proposed changes do not impact accident offsite dose, containment pressure or temperature, emergency core cooling system (ECCS) or reactor protection system (RPS) settings or any other parameter that could affect a margin of safety. The elimination of cycle testing of the PORV block valves for the remainder of the Unit Two operating cycle and the addition of the proposed compensatory action that enhances assurance of valve operation are somewhat offsetting.

Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

Conclusion

Based on the preceding analysis, SNC has determined that the proposed changes to the Technical Specifications will not significantly increase the probability or consequences of an accident previously evaluated, create the possibility of a new or different kind of accident from any accident previously evaluated, or involve a significant reduction in a margin of safety. SNC therefore concludes that the proposed changes meet the requirements of 10 CFR 50.92(c) and do not involve a significant hazards consideration.

Enclosure 3

Joseph M. Farley Nuclear Plant
Unit Two Pressurizer Power Operated Relief Valve Block Valves Surveillance Testing
Technical Specification Changes

Marked-Up Technical Specification Pages

Affected Pages

3.4.11-3
3.4.11-4

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
F. More than one block valve inoperable.	F.1	Place associated PORVs in manual control.	1 hour
	AND		
	F.2	Restore one block valve to OPERABLE status.	2 hours
	AND		
	F.3	Restore remaining Block valve to OPERABLE status.	72 hours
G. Required Action and associated Completion Time of Condition F not met.	G.1	Be in MODE 3.	6 hours
	AND		
	G.2	Be in MODE 4.	12 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.4.11.1 ----------NOTES---------- 1. Not required to be met with block valve closed in accordance with the Required Action of Condition B or E. 2. Not required to be performed prior to entry into MODE 3. ---------- Perform a complete cycle of each block valve.	92 days

3. Not required to be performed for Unit 2 for the remainder of operating cycle 14.

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.4.11.2	----------NOTE---------- Not required to be performed prior to entry into MODE 3. ---------- Perform a complete cycle of each PORV during MODE 3 or 4.	18 months
SR 3.4.11.3	Perform a complete cycle of each PORV using the backup PORV control system.	18 months

insert

SR 3.4.11.4	----------NOTE---------- Required to be performed only for Unit 2 for the remainder of operating cycle 14. ---------- Check power available to the Unit Two PORV block valves.	24 hours

Enclosure 4

Joseph M. Farley Nuclear Plant
Unit Two Pressurizer Power Operated Relief Valve Block Valves Surveillance Testing
Technical Specification Changes

Clean Typed Technical Specification Pages

Affected Pages

3.4.11-3
3.4.11-4

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
F. More than one block valve inoperable.	F.1	Place associated PORVs in manual control.	1 hour
	AND		
	F.2	Restore one block valve to OPERABLE status.	2 hours
	AND		
	F.3	Restore remaining block valve to OPERABLE status.	72 hours
G. Required Action and associated Completion Time of Condition F not met.	G.1	Be in MODE 3.	6 hours
	AND		
	G.2	Be in MODE 4.	12 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.4.11.1	----------NOTES---------- 1. Not required to be met with block valve closed in accordance with the Required Action of Condition B or E. 2. Not required to be performed prior to entry into MODE 3. 3. Not required to be performed for Unit 2 for the remainder of operating cycle 14. ---------- Perform a complete cycle of each block valve.	92 days

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.4.11.2	----------NOTE---------- Not required to be performed prior to entry into MODE 3. ---------- Perform a complete cycle of each PORV during MODE 3 or 4.	18 months
SR 3.4.11.3	Perform a complete cycle of each PORV using the backup PORV control system.	18 months
SR 3.4.11.4	----------NOTE---------- Required to be performed only for Unit 2 for the remainder of operating cycle 14. ---------- Check power available to the Unit Two PORV block valves.	24 hours

Enclosure 5

Joseph M. Farley Nuclear Plant
Unit Two Pressurizer Power Operated Relief Valve Block Valves Surveillance Testing
Technical Specification Changes

Marked-Up Technical Specification Bases Pages

Affected Pages

B 3.4.11-7
B 3.4.11-8

BASES

ACTIONS (continued)

G.1 and G.2

If the Required Actions of Condition F are not met, then 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 and to MODE 4 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. In MODES 4, 5, and 6, the PORVs are not required OPERABLE.

SURVEILLANCE REQUIREMENTS

SR 3.4.11.1

Block valve cycling verifies that the valve(s) can be closed if needed. The basis for the Frequency of 92 days is the ASME Code, Section XI (Ref. 3). If the block valve is closed to isolate a PORV that is capable of being manually cycled, the OPERABILITY of the block valve is of importance, because opening the block valve is necessary to permit the PORV to be used for manual control of reactor pressure. If the block valve is closed to isolate an otherwise inoperable PORV, the maximum Completion Time to restore the PORV and open the block valve is 72 hours, which is well within the allowable limits (25%) to extend the block valve Frequency of 92 days. Furthermore, these test requirements would be completed by the reopening of a recently closed block valve upon restoration of the PORV to OPERABLE status (i.e., completion of the Required Actions fulfills the SR).

This SR is modified by two Notes. Note 1 modifies this SR by stating that it is not required to be met with the block valve closed, in accordance with the Required Action of this LCO. Note 2 modifies this SR to allow entry into and operation in MODE 3 prior to performing the SR. This allows the test to be performed in MODE 3 under operating temperature conditions, prior to entering MODE 1 or 2.

A temporary third note has been added to suspend SR 3.4.11.1 for Unit Two for the remainder of operating cycle 14.

SR 3.4.11.2

SR 3.4.11.2 requires a complete cycle of each PORV in MODE 3 or 4. The PORVs are stroke tested during MODES 3 or 4 with the associated block valves closed in order to limit the uncertainty introduced by testing the PORVs at lesser system temperatures than expected during actual operating conditions. Operating a PORV

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.4.11.2 (continued)

through one complete cycle ensures that the PORV can be manually actuated for mitigation of an SGTR. The Frequency of 18 months is based on a typical refueling cycle and industry accepted practice. The Note modifies this SR to allow entry into and operation in MODE 3 prior to performing the SR. This allows the test to be performed in MODE 3 under operating temperature conditions, prior to entering MODE 1 or 2.

SR 3.4.11.3

SR 3.4.11.3 requires a complete cycle of each PORV using the backup PORV control system. This surveillance verifies the capability to operate the PORVs using the backup air and nitrogen supply systems. Additionally, this surveillance ensures the correct function of the associated air and nitrogen supply system valves. The 18-month Frequency is based on a typical refueling cycle and industry accepted practice for Surveillances requiring the PORVs to be cycled.

INSERT

SR 3.4.11.4

SR 3.4.11.4 applies only to Unit 2 for the remainder of cycle 14. It requires that power to the PORV block valves is checked to be available at least every 24 hours. This surveillance provides additional assurance that the PORV block valves could be stroked if demanded while SR 3.4.11.1 is suspended.

REFERENCES

1. Regulatory Guide 1.32, February 1977.
2. FSAR Sections 5.5 and 15.2.
3. ASME, Boiler and Pressure Vessel Code, Section XI.

Enclosure 6

Joseph M. Farley Nuclear Plant
Unit Two Pressurizer Power Operated Relief Valve Block Valves Surveillance Testing
Technical Specification Changes

Clean Typed Technical Specification Bases Pages

Affected Pages

B 3.4.11-7
B 3.4.11-8

BASES

ACTIONS (continued)

G.1 and G.2

If the Required Actions of Condition F are not met, then 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 and to MODE 4 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. In MODES 4, 5, and 6, the PORVs are not required OPERABLE.

SURVEILLANCE REQUIREMENTS

SR 3.4.11.1

Block valve cycling verifies that the valve(s) can be closed if needed. The basis for the Frequency of 92 days is the ASME Code, Section XI (Ref. 3). If the block valve is closed to isolate a PORV that is capable of being manually cycled, the OPERABILITY of the block valve is of importance, because opening the block valve is necessary to permit the PORV to be used for manual control of reactor pressure. If the block valve is closed to isolate an otherwise inoperable PORV, the maximum Completion Time to restore the PORV and open the block valve is 72 hours, which is well within the allowable limits (25%) to extend the block valve Frequency of 92 days. Furthermore, these test requirements would be completed by the reopening of a recently closed block valve upon restoration of the PORV to OPERABLE status (i.e., completion of the Required Actions fulfills the SR).

This SR is modified by two Notes. Note 1 modifies this SR by stating that it is not required to be met with the block valve closed, in accordance with the Required Action of this LCO. Note 2 modifies this SR to allow entry into and operation in MODE 3 prior to performing the SR. This allows the test to be performed in MODE 3 under operating temperature conditions, prior to entering MODE 1 or 2. A temporary third note has been added to suspend SR 3.4.11.1 for Unit Two for the remainder of operating cycle 14.

SR 3.4.11.2

SR 3.4.11.2 requires a complete cycle of each PORV in MODE 3 or 4. The PORVs are stroke tested during MODES 3 or 4 with the associated block valves closed in order to limit the uncertainty

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.4.11.2 (continued)

introduced by testing the PORVs at lesser system temperatures than expected during actual operating conditions. Operating a PORV through one complete cycle ensures that the PORV can be manually actuated for mitigation of an SGTR. The Frequency of 18 months is based on a typical refueling cycle and industry accepted practice. The Note modifies this SR to allow entry into and operation in MODE 3 prior to performing the SR. This allows the test to be performed in MODE 3 under operating temperature conditions, prior to entering MODE 1 or 2.

SR 3.4.11.3

SR 3.4.11.3 requires a complete cycle of each PORV using the backup PORV control system. This surveillance verifies the capability to operate the PORVs using the backup air and nitrogen supply systems. Additionally, this surveillance ensures the correct function of the associated air and nitrogen supply system valves. The 18-month Frequency is based on a typical refueling cycle and industry accepted practice for Surveillances requiring the PORVs to be cycled.

SR 3.4.11.4

SR 3.4.11.4 applies only to Unit 2 for the remainder of cycle 14. It requires that power to the PORV block valves is checked to be available at least every 24 hours. This surveillance provides additional assurance that the PORV block valves could be stroked if demanded while SR 3.4.11.1 is suspended.

REFERENCES

1. Regulatory Guide 1.32, February 1977.
2. FSAR Sections 5.5 and 15.2.
3. ASME, Boiler and Pressure Vessel Code, Section XI.