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RADIATION MONITORING INSTRUMENTATION

| INSTRUMENT | MINIMUM CHANNELS OPERABLE | APPLICABLE MODES | SETPOINT (3) | MEASUREMENT RANGE | ACTION |
|---|---|---|---|---|---|
| 2. PROCESS MONITORS (Continued) | | | | | |
| ii. Particulate (I-131) (2RMF-RQ301A) | 1 | (2) | $\leq 6.70 \times 10^{-9}$ µCi/cc | $10^{-10}$ to $10^{-5}$ µCi/cc | 21 |
| c. Noble Gas and Effluent Monitors | | | | | |
| i. Supplementary Leak Collection and Release System | | | | | |
| 1) Mid Range Noble Gas (Xe-133) (2HVS-RQ109C) | 1 | 1,2,3&4 | N.A. | $10^{-4}$ to $10^{2}$ µCi/cc | 35 |
| 2) High Range Noble Gas (Xe-133) (2HVS-RQ109D) | 1 | 1,2,3&4 | N.A. | $10^{-1}$ to $10^{5}$ µCi/cc | 35 |
| ii. Containment Purge Exhaust (Xe-133) (2HVR-RQ104A & B) | 2 | (5) | $\leq 1.01 \times 10^{-3}$ µCi/cc | $10^{-6}$ to $10^{-1}$ µCi/cc | 22 |
| iii. Main Steam Discharge (Kr-88) (2MSS-RQ101A,B & C) | 1/SG | 1,2,3&4 | $\leq 3.9 \times 10^{-2}$ µCi/cc | $10^{-2}$ to $10^{3}$ µCi/cc | 35 |

TABLE 3.3-6 (Continued)

TABLE NOTATIONS

(1) With fuel in the storage pool or building.

(2) With irradiated fuel in the storage pool.

(3) Above background.

(4) During movement of irradiated fuel.

(5) During movement of fuel assemblies within containment.

ACTION STATEMENTS

ACTION 19 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, perform area surveys of the monitored area with portable monitoring instrumentation at least once per 24 hours.

ACTION 20 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, comply with the ACTION requirements of Specification 3.4.6.1.

ACTION 21 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, comply with the applicable ACTION requirements of Specifications 3.9.12 and 3.9.13.

ACTION 22 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, comply with the ACTION requirements of Specification 3.9.9.

ACTION 35 - With the number of OPERABLE channels less than required by the Minimum Channels OPERABLE requirement, either restore the inoperable channel(s) to OPERABLE status within 72 hours, or:

1) Initiate the preplanned alternate method of monitoring the appropriate parameter(s), and

2) Return the channel to OPERABLE status within 30 days, or, explain in the next Annual Radioactive Effluent Release Report why the inoperability was not corrected in a timely manner.

TABLE 4.3-3 (Continued)

| INSTRUMENT | CHANNEL CHECK | CHANNEL CALIBRATION | CHANNEL FUNCTIONAL TEST | MODES IN WHICH SURVEILLANCE REQUIRED |
|---|---|---|---|---|
| 2. PROCESS MONITORS (Continued) | | | | |
| c. Noble Gas Effluent Monitors | | | | |
| i. Supplementary Leak Collection and Release System (2HVS-RQ109C & D) | S | R | M | 1, 2, 3 & 4 |
| ii. Containment Purge Exhaust (2HVR-RQ104A & B) | S | R | M | ### |
| iii. Main Steam Discharge (2MSS-RQ101A, B & C) | S | R | M | 1, 2, 3 & 4 |

### During movement of fuel assemblies within containment.

## 3/4.9.4 CONTAINMENT BUILDING PENETRATIONS

### LIMITING CONDITION FOR OPERATION

3.9.4 The containment building penetrations shall be in the following status:

a. The equipment hatch closed and held in place by a minimum of four bolts;

b. A minimum of one door in each air lock is closed, or both doors of the containment personnel air lock (PAL) may be open if:

1. At least one of the PAL doors is capable of being closed,

2. A designated individual is available to close at least one PAL door,

3. The PAL area is being exhausted to at least one OPERABLE filtered Supplemental Leak Collection and Release System (SLCRS) train with all doors (except for the air lock doors) to the PAL area closed[1], and

4. SR 4.9.4.4 has been satisfied with both PAL doors open; and

c. Each penetration (excluding the PAL) providing direct access from the containment atmosphere to the outside atmosphere shall be either:

1. Closed by an isolation valve, blind flange, manual valve, or approved functional equivalent, or the penetration may be open if:

a. The penetration is capable of being closed by an isolation valve, blind flange, manual valve, or approved functional equivalent,

b. The maximum equivalent containment penetration opening size for the associated plant area is not exceeded,

c. A designated individual is available to close the penetration, and

(1) Except for entry and exit.

LIMITING CONDITION FOR OPERATION (Continued)

d. The area(s) outside of containment, where the open containment penetration piping is located, is being exhausted to at least one OPERABLE filtered SLCRS train with all doors to the area(s) required to be serviced by SLCRS closed[1]; or

2. Capable of being closed by an OPERABLE Containment Purge and Exhaust Isolation System with the containment air being exhausted through this system at a flow rate of ≤ 7500 cfm to at least one OPERABLE filtered SLCRS train.

APPLICABILITY: During movement of fuel assemblies within the containment.

ACTION:

With the requirements of the above specification not satisfied, immediately suspend all operations involving movement of fuel assemblies in the containment. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.9.4.1 Each of the above required containment penetrations shall be determined to be in its above required condition:

a. At least once per 7 days, and

b. For all areas located outside of containment containing open containment penetrations, including PAL doors, verify at least once per 12 hours that these areas are being exhausted to filtered SLCRS and that all required area doors are closed.[1]

4.9.4.2 The containment purge and exhaust system shall be demonstrated OPERABLE by:

a. Verifying the flow rate to filtered SLCRS at least once per 24 hours when the system is in operation, and

b. Testing the Containment Purge and Exhaust Isolation Valves per the applicable portions of Specification 4.6.3.1.2.

(1) Except for entry and exit.

SURVEILLANCE REQUIREMENTS (Continued)

4.9.4.3 The required portions of filtered SLCRS shall be demonstrated OPERABLE per Specification 4.7.8.1 with exception to item 4.7.8.1.c.2.

4.9.4.4 For areas required to be exhausted to filtered SLCRS (except for the containment), verify at least once per 7 days that filtered SLCRS can maintain the area at a negative pressure of ≤ -0.125 inches of water gauge with respect to atmospheric pressure. The verification shall establish the maximum equivalent containment penetration opening size for each applicable plant area.

## CONTAINMENT PURGE AND EXHAUST ISOLATION SYSTEM

### LIMITING CONDITION FOR OPERATION

3.9.9 The Containment Purge and Exhaust isolation system shall be OPERABLE.

APPLICABILITY: During movement of fuel assemblies within the containment.

ACTION:

With the Containment Purge and Exhaust isolation system inoperable, close each of the purge and exhaust penetrations providing direct access from the containment atmosphere to the outside atmosphere. The provisions of Specification 3.0.3 are not applicable.

### SURVEILLANCE REQUIREMENTS

4.9.9 The Containment Purge and Exhaust isolation system shall be demonstrated OPERABLE at least once per 7 days by verifying that containment Purge and Exhaust isolation occurs on manual initiation and on a high radiation signal from each of the containment radiation monitoring instrumentation channels.

BASES

## 3/4.9.1 BORON CONCENTRATION

The limitations on minimum boron concentration (2000 ppm) ensure that: 1) the reactor will remain subcritical during CORE ALTERATIONS, and 2) a uniform boron concentration is maintained for reactivity control in the water volume having direct access to the reactor vessel. The limitation on $K_{eff}$ of no greater than 0.95 which includes a conservative allowance for uncertainties, is sufficient to prevent reactor criticality during refueling operations.

Isolating all reactor water makeup paths from unborated water sources precludes the possibility of an uncontrolled boron dilution of the filled portions of the Reactor Coolant System. This limitation is consistent with the initial conditions assumed in the accident analyses for MODE 6.

## 3/4.9.2 INSTRUMENTATION

The OPERABILITY of the source range neutron flux monitors ensures that redundant monitoring capability is available to detect changes in the reactivity condition of the core when performing those evolutions with the potential to initiate criticality. Suitable detectors used in place of primary source range neutron flux monitors N-31 and N-32 are recognized as alternate detectors. Alternate detectors may be used in place of primary source range neutron flux monitors as long as the required indication is provided. Since installation of the upper internals does not involve movement of fuel or a significant positive reactivity addition to the core, one primary or alternate source range neutron flux monitor with continuous visual indication in the control room provides adequate neutron flux monitoring capability during this evolution.

## 3/4.9.3 DECAY TIME

The minimum requirement for reactor subcriticality prior to movement of irradiated fuel assemblies in the reactor vessel ensures that sufficient time has elapsed to allow the radioactive decay of the short lived fission products. This decay time is consistent with the assumptions used in the accident analyses.

## 3/4.9.4 CONTAINMENT BUILDING PENETRATIONS

The requirements on containment penetration closure limit leakage of radioactive material within containment to the environment to ensure compliance with 10 CFR 100 limits. The requirements on operation of the SLCRS ensure that radioactive material released through open containment penetrations, as the result of a fuel

3/4.9.4 CONTAINMENT BUILDING PENETRATIONS (Continued)

handling accident (FHA) within containment, will be filtered through HEPA filters and charcoal absorbers prior to discharge to the atmosphere. These requirements are sufficient to restrict radioactive material release from 2.34 fuel assemblies (617 fuel rods) being ruptured as a result of a FHA based upon the lack of containment pressurization potential while moving fuel assemblies within containment.

Except for the containment purge and exhaust penetrations and open penetrations that meet the requirements of this specification, all containment penetrations that provide direct access from containment atmosphere to outside atmosphere must be isolated on at least one side. Penetration closure may be achieved by an isolation valve, blind flange, manual valve, or functional equivalent. Functional equivalent isolation ensures releases from the containment are prevented for credible accident scenarios. The isolation techniques must be approved by an engineering evaluation and may include use of a material that can provide a temporary, pressure tight seal capable of maintaining the integrity of the penetration to restrict the release of radioactive material from a FHA occurring inside containment.

An OPERABLE filtered SLCRS train is required to include only those portions of the system that are necessary to ensure that a filtered exhaust path is available from the required plant areas to HEPA and charcoal adsorbers and then to the elevated release point on top of the containment building. As a minimum, an OPERABLE filtered SLCRS train includes one OPERABLE filtered exhaust fan. If two filtered SLCRS fans are utilized to satisfy the requirements of SR 4.9.4.4, then in order to satisfy the LCO requirements, each fan must be in operation and be OPERABLE with both a normal and emergency power source available.

LCO 3.9.4 requires that a minimum of one train of filtered SLCRS be operating and OPERABLE. A single OPERABLE train of filtered SLCRS that is operating ensures that no undetected failures preventing system operation will occur, and that any active failure will be readily detected. Therefore, the LCO requirement to have an OPERABLE and operating train of filtered SLCRS is sufficient to mitigate the consequences of a FHA within the containment.

The personnel air lock (PAL) area is the plant area where the outer PAL door is located.

3/4.9.4 CONTAINMENT BUILDING PENETRATIONS (Continued)

A PAL door is considered capable of being closed when the following criteria are satisfied:

1. Administrative procedures have been established to:

   a. ensure that appropriate personnel are aware of the Open status of the containment during movement of fuel within the containment;

   b. ensure that an open air lock is capable of rapid closure (i.e., ≤ 30 minutes), with quick disconnect and removal capability for hoses, cables, ramps, and door seal protective covers; and

   c. ensure that an individual is designated and available to close the air lock following the evacuation that would occur in the event of an accident.

A containment penetration is considered capable of being closed when the following criteria are satisfied:

1. Administrative procedures have been established to:

   a. ensure that appropriate personnel are aware of the Open status of the containment during movement of fuel within the containment;

   b. ensure that the containment penetration is capable of rapid closure (i.e., ≤ 30 minutes) by closing an isolation valve, manual valve, blind flange, or approved functional equivalent; and

   c. ensure that an individual is designated and available to close the containment penetration.

LCO 3.9.4.b.4 requires that SR 4.9.4.4 has been satisfied with both PAL doors open. This requirement is necessary to ensure that the opening of PAL will not adversely affect the ability of filtered SLCRS to maintain the PAL area at a negative pressure. LCO 3.9.4.c.1.b permits a containment penetration (excluding the PAL) to be open if the maximum equivalent containment penetration opening size is not exceeded. This requirement is necessary to ensure that the opening of a containment penetration will not adversely affect the ability of filtered SLCRS to maintain the associated plant area at a negative pressure. SR 4.9.4.4 establishes the maximum equivalent containment penetration opening size for each applicable plant area.

3/4.9.4 CONTAINMENT BUILDING PENETRATIONS (Continued)

For the purpose of satisfying SR 4.9.4.1, area flow rate is not required to be verified. Each flow path must be verified to be aligned in the correct manner to ensure that the area is being exhausted to at least one OPERABLE filtered SLCRS train. In addition, the term "open containment penetrations" as stated in SR 4.9.4.1 is defined as a penetration that provides direct access from the containment atmosphere to the outside atmosphere. The 12 hour surveillance specified in SR 4.9.4.1.b does not pertain to the containment purge and exhaust containment penetrations provided that containment air is being exhausted through the exhaust penetration to filtered SLCRS. For the purpose of satisfying the requirements of SR 4.9.4.1, it is acceptable for the PAL area to have an observed air flow through the PAL into containment and thereby be considered to be exhausting to filtered SLCRS provided the following conditions have been met: 1) SR 4.9.4.4 has demonstrated that with both air lock doors open and the purge and exhaust containment penetrations closed, the PAL area is maintained negative with respect to atmosphere pressure by the PAL area filtered SLCRS flow path. 2) The PAL area is verified to be serviced (i.e., flow path alignment) by filtered SLCRS from a ventilation flow path other than containment.

SR 4.9.4.4 verifies the required plant area(s) integrity and the ability of filtered SLCRS to maintain the area(s) at a negative pressure with open containment penetrations. The ability of filtered SLCRS to maintain a negative pressure in the required plant area(s) provides assurance that radioactivity that may be released through open containment penetrations, due to a fuel handling accident occurring inside containment, is collected and filtered for iodine removal prior to discharge to the atmosphere. The negative pressure with respect to atmosphere includes the verification of negative pressure of $\leq$ -0.125 inches of water gauge with respect to adjacent plant areas (excluding containment) that are not being serviced by filtered SLCRS as well as environmental atmosphere pressure. The purge and exhaust containment penetrations need to be isolated during performance of SR 4.9.4.4. The isolation of these containment penetrations is necessary to accurately reflect the plant conditions following a fuel handling accident inside containment. These containment penetrations will be automatically isolated by a high radiation signal from the containment purge exhaust radiation monitors. Therefore, SR 4.9.4.4 can not be performed with this additional SLCRS filtered flow path in service. SR 4.9.4.4 requires that the maximum equivalent containment penetration opening size for each applicable plant area be established. This requirement is necessary to ensure that the opening of containment penetrations will not adversely affect the ability of filtered SLCRS to maintain the associated plant area at a negative pressure. The establishment

3/4.9.4 CONTAINMENT BUILDING PENETRATIONS (Continued)

of the maximum equivalent containment penetration opening size for each applicable plant area involves the measurement of the filtered SLCRS exhaust flow rate and the negative pressure for the applicable plant area. Utilizing this data, a maximum equivalent containment penetration opening size can be calculated. The available margin between the measured area negative pressure and the minimum required area negative pressure is utilized to allow opening of containment penetrations. For the PAL area, the establishment of the maximum equivalent containment penetration opening size is accomplished by performing SR 4.9.4.4 with both doors of the PAL open. If the PAL is the only containment penetration in the PAL area that will be opened, then a calculation of the maximum equivalent containment penetration opening size is not required. The performance of SR 4.9.4.4 with both doors of the PAL open establishes the maximum equivalent containment penetration opening size for the PAL area. The area where the open containment penetration is located may be defined as containing more than one room. For example, if two rooms are connected via an open doorway, the area can be defined as both rooms provided that this area is being exhausted to filtered SLCRS. All doors to this area are required to be closed except as noted in Footnote (1). This footnote provides an exception to the requirement that all doors to the area are closed to allow for entry and exit. This footnote is not intended to permit doors to be blocked opened.

3/4.9.5 COMMUNICATIONS

The requirements for communications capability ensures that refueling station personnel can be promptly informed of significant changes in the facility status or core reactivity conditions during CORE ALTERATIONS.

3/4.9.6 MANIPULATOR CRANE OPERABILITY

The OPERABILITY requirements for the manipulator cranes ensure that: 1) manipulator cranes will be used for movement of control rods and fuel assemblies; 2) each crane has sufficient load capacity to lift a control rod or fuel assembly; and 3) the core internals and pressure vessel are protected from excessive lifting force in the event they are inadvertently engaged during lifting operations.

## 3/4.9.7 (This Specification is not used.)

## 3/4.9.8 RESIDUAL HEAT REMOVAL AND COOLANT CIRCULATION

The requirement that at least one residual heat removal (RHR) loop be in operation ensures that 1) sufficient cooling capacity is available to remove decay heat and maintain the water in the reactor pressure vessel below 140°F as required during the REFUELING MODE, and 2) sufficient coolant circulation is maintained throughout the reactor core to minimize the effect of a boron dilution incident and prevent boron stratification.

The requirement to have two RHR loops OPERABLE when there is less than 23 feet of water above the reactor pressure vessel flange ensures that a single failure of the operating RHR loop will not result in a complete loss of residual heat removal capability. With the reactor vessel head removed and 23 feet of water above the reactor pressure vessel flange, a large heat sink is available for core cooling. Thus, in the event of a failure of the operating RHR loop, adequate time is provided to initiate emergency procedures to cool the core.

## 3/4.9.9 CONTAINMENT PURGE AND EXHAUST ISOLATION SYSTEM

THE OPERABILITY of this system ensures that the containment vent and purge penetrations will be automatically isolated upon detection of high radiation levels within the containment. The integrity of the containment penetrations of this system is required to meet 10 CFR 100 requirements in the event of a fuel handling accident inside containment. The piping that connects this system to filtered SLCRS is not safety related and, therefore, can not be relied upon to mitigate the radiological effects of a fuel handling accident inside containment.

## 3/4.9.10 AND 3/4.9.11 WATER LEVEL - REACTOR VESSEL AND STORAGE POOL

The restrictions on minimum water level ensure that sufficient water depth is available to remove 99% of the assumed 10% iodine gap activity released from the rupture of an irradiated fuel assembly. The minimum water depth is consistent with the assumptions of the accident analysis.

## 3/4.9.12 and 3/4.9.13 FUEL BUILDING VENTILATION SYSTEM

The limitations on the storage pool ventilation system ensure that all radioactive material released from an irradiated fuel assembly will be filtered through the HEPA filters and charcoal adsorber prior to discharge to the atmosphere. The OPERABILITY of this system and the resulting iodine removal capacity are consistent with the assumptions of the accident analysis. The spent fuel pool area ventilation system is non-safety related and only recirculates air through the fuel building. The fuel building portion of the SLCRS is safety related and continuously filters the fuel building exhaust air. This maintains a negative pressure in the fuel building.

## 3/4.9.14 FUEL STORAGE - SPENT FUEL STORAGE POOL

The requirements for fuel storage in the spent fuel pool ensure that: (1) the spent fuel pool will remain subcritical during fuel storage; and (2) a uniform boron concentration is maintained in the water volume in the spent fuel pool to provide negative reactivity for postulated accident conditions under the guidelines of ANSI 16.1-1975. The value of 0.95 or less for $K_{eff}$ which includes all uncertainties at the 95/95 probability/confidence level is the acceptance criteria for fuel storage in the spent fuel pool.

Verification that peak fuel rod burnup is less than 60 GWD/MTU is provided in the reload evaluation report associated with each fuel cycle.

The Action Statement applicable to fuel storage in the spent fuel pool ensures that: (1) the spent fuel pool is protected from distortion in the fuel storage pattern that could result in a critical array during the movement of fuel; and (2) the boron concentration is maintained at $\geq$ 1050 ppm (this includes a 50 ppm conservative allowance for uncertainties) during all actions involving movement of fuel in the spent fuel pool.

The Surveillance Requirements applicable to fuel storage in the spent fuel pool ensure that: (1) the fuel assemblies satisfy the analyzed U-235 enrichment limits or an analysis has been performed and it was determined that $K_{eff}$ is $\leq$ 0.95; and (2) the boron concentration meets the 1050 ppm limit.