

REFUELING OPERATIONS

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 door is capable of being closed and held in place by a minimum of four bolts*,
- b. A minimum of one door in each airlock is capable of being closed*, and
- c. Each penetration providing direct access from the containment atmosphere to the outside atmosphere shall be either:
 1. Be capable of being* closed by a manual or automatic isolation valve, blind flange or equivalent, or
 2. Be capable of being closed by OPERABLE automatic normal containment purge and containment pre-entry purge makeup and exhaust isolation valves*.

APPLICABILITY: During CORE ALTERATIONS or movement of irradiated fuel within the containment.

ACTION:

With the requirements of the above specification not satisfied, immediately suspend all operations involving CORE ALTERATIONS or movement of irradiated fuel in the containment building.

SURVEILLANCE REQUIREMENTS

4.9.4 Each of the above required containment building penetrations shall be determined to be either in its closed/isolated condition, capable of being closed/isolated*, or capable of being closed by OPERABLE automatic normal containment purge and containment pre-entry purge makeup and exhaust isolation valves at least once per 7 days during CORE ALTERATIONS or movement of irradiated fuel in the containment building by:

- a. Verifying the penetrations are either closed/isolated or capable of being closed/isolated*, or
- b. Testing the normal containment purge and containment pre-entry purge makeup and exhaust isolation valves per the applicable portions of Specification 4.6.3.2.

* Penetration flow path(s) providing direct access from the containment atmosphere to the outside atmosphere may be opened under administrative controls.

3/4.9 REFUELING OPERATIONS

BASES

3/4.9.1 BORON CONCENTRATION

The limitations on reactivity conditions during REFUELING 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. These limitations are consistent with the initial conditions assumed for the boron dilution incident in the safety analyses and are specified in the cycle-specific COLR. The boron concentration limit specified in the COLR ensures that a core K_{eff} of ≤ 0.95 is maintained during fuel handling operations. The administrative controls over the required valves during refueling operations precludes the possibility of uncontrolled boron dilution of the filled portion of the RCS. This action prevents flow to the RCS of unborated water by closing flow paths from sources of unborated water.

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.

3/4.9.3 DECAY TIME - DELETED

3/4.9.4 CONTAINMENT BUILDING PENETRATIONS

The requirements on containment building penetration closure and OPERABILITY ensure that a release of radioactive material within containment will be restricted from leakage to the environment. The OPERABILITY and closure restrictions are sufficient to restrict radioactive material release from a fuel element rupture based upon the lack of containment pressurization potential while in the REFUELING MODE. Penetrations applicable to Technical Specification 3.9.4.b and 3.9.4.c may be opened provided the following administrative controls are in effect:

1. An individual or individuals shall be designated and available at all times, capable of isolating the breached penetration.
2. The breached penetrations shall not be obstructed unless capability for rapid removal of obstructions is provided (such as quick disconnects for hoses).
3. For the Personnel Air Lock, at least one door must be capable of being closed and secured. Additionally, the equipment hatch must be capable of being closed and secured. Equivalent isolation methods may also be used.

The LCO is modified by a Note allowing penetration flow paths providing direct access from the containment atmosphere to the outside atmosphere to be open under administrative controls. Administrative controls ensure that 1) appropriate personnel are aware of the open status of the penetration flow path during CORE ALTERATIONS or movement of irradiated fuel assemblies within containment, and 2) specified individuals are designated and readily available to isolate the flow path in the event of a fuel handling accident.

REFUELING OPERATIONS

BASES

CONTAINMENT BUILDING PENETRATIONS (Continued)

The allowance to have containment penetration (including the airlock doors and equipment hatch) flow paths with direct access from the containment atmosphere to the outside atmosphere to be unisolated during fuel movement and CORE ALTERATIONS is based on (1) confirmatory dose calculations as approved by the NRC staff which indicate acceptable radiological consequences and (2) commitments from the licensee to implement acceptable administrative procedures that ensure in the event of a refueling accident that the airlock or equipment hatch can and will be promptly closed following containment evacuation (even though the containment fission product control function is not required to meet acceptable dose consequences) and that the open penetration(s) can and will be promptly closed. The time to close such penetrations or combination of penetrations shall be included in the confirmatory dose calculations.

Containment penetrations that provide direct access from containment atmosphere to outside atmosphere must be isolated, or capable of isolation via administrative controls, on at least one side of containment. Isolation may be achieved by an OPERABLE automatic isolation valve, or by a manual isolation valve, blind flange, or equivalent. Equivalent isolation methods include use of a material that can provide a temporary, atmospheric pressure, ventilation barrier for the other containment penetrations during fuel movement.

3/4.9.5 COMMUNICATIONS - DELETED

3/4.9.6 REFUELING MACHINE - DELETED

3/4.9.7 CRANE TRAVEL - FUEL HANDLING BUILDING - DELETED

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 vessel below 140°F as required during the REFUELING MODE, and (2) sufficient coolant circulation is maintained through the 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 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 at least 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.

The minimum RHR flow requirement is reduced to 900 gpm when the reactor water level is below the reactor vessel flange. The 900 gpm limit reduces the possibility of cavitation during operation of the RHR pumps and ensures sufficient mixing in the event of a MODE 6 boron dilution incident.

3/4.9.9 CONTAINMENT VENTILATION ISOLATION SYSTEM

The OPERABILITY of this system ensures that the containment purge makeup and exhaust penetrations will be automatically isolated upon detection of high radiation levels within the containment. The OPERABILITY of this system is required to restrict the release of radioactive material from the containment atmosphere to the environment.