

J. **Barnie Beasley, Jr., P.E.**
Vice President
Vogtle Project

**Southern Nuclear
Operating Company, Inc.**
40 Inverness Center Parkway
P.O. Box 1295
Birmingham, Alabama 35201

Tel 205.992.7110
Fax 205.992.0403



Energy to Serve Your WorldSM

August 16, 2001

LCV-1471

Docket Nos. 50-424
50-425

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

Ladies and Gentlemen:

**VOGTLE ELECTRIC GENERATING PLANT
REQUEST TO REVISE TECHNICAL SPECIFICATIONS
PRIMARY COOLANT SOURCES OUTSIDE CONTAINMENT
POST ACCIDENT SAMPLING SYSTEM**

In accordance with the requirements of 10 CFR 50.90, Southern Nuclear Operating Company (SNC) proposes to revise the Vogtle Electric Generating Plant (VEGP) Unit 1 and Unit 2 Technical Specifications (TS). The proposed amendment would revise VEGP TS 5.5.2, "Primary Coolant Sources Outside Containment," and delete TS 5.5.3, "Post Accident Sampling System," to eliminate the requirements for a post accident sampling system. The proposed changes are consistent with the NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366, "Elimination of Requirements for a Post Accident Sampling System (PASS)." The availability of this TS improvement was announced in the Federal Register on October 31, 2000, as part of the Consolidated Line Item Improvement Process (CLIIP).

Enclosure 1 provides the basis for the proposed changes. This includes a description of the proposed changes, the requested confirmation of applicability, plant-specific verifications and the no significant hazards determination. Enclosure 2 provides the existing TS pages marked-up to show the proposed changes, and Enclosure 3 provides clean-typed copies of the affected TS pages.

SNC requests approval of the proposed changes by December 31, 2001, with the amendment being implemented by June 28, 2002. The approval date was administratively selected to allow for NRC review, and the implementation date was selected to allow for revision of the necessary procedures to reflect elimination of the PASS.

A001

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

SOUTHERN NUCLEAR OPERATING COMPANY

By: 
J. B. Beasley, Jr.

Sworn to and subscribed before me this 16th day of August, 2001.


Notary Public

My commission expires: 11/10/02

JBB/CAB/NJS

Enclosure 1: Basis for Proposed Change
Enclosure 2: Marked-up TS and Bases Pages
Enclosure 3: Clean-typed TS and Bases Pages

cc: Southern Nuclear Operating Company
Mr. J. T. Gasser
Mr. M. Sheibani
SNC Document Management

U. S. Nuclear Regulatory Commission
Mr. L. A. Reyes, Regional Administrator
Mr. R. R. Assa, Project Manager, NRR
Mr. John Zeiler, Senior Resident Inspector, Vogtle

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

Enclosure 1
Vogtle Electric Generating Plant
Request to Revise Technical Specifications
Primary Coolant Sources Outside Containment
Post Accident Sampling System

Basis for Proposed Change

Proposed Change

The proposed change would revise the Vogtle Electric Generating Plant (VEGP) Unit 1 and Unit 2 Technical Specifications (TS) 5.5.2, Primary Coolant Sources Outside Containment, to add the following words immediately after item 5) Post Accident Processing System:

“(until such time as a modification eliminates the Post Accident Processing System as a potential leakage path)”

Please note that the Post Accident Processing System referred to in TS 5.5.2 is in fact the Post Accident Sampling System that provides the sampling capability required by TS 5.5.3. Technical Specification 5.5.3, Post Accident Sampling, would be deleted entirely to remove the requirements for the Post Accident Sampling System (PASS) from the TS. In addition, for the sake of completeness, the Bases for LCO 3.3.3, Post Accident Monitoring Instrumentation, Required Action I.1 would be revised to remove a reference to the PASS.

The proposed changes are consistent with NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler TSTF-366. The availability of this TS improvement was announced in the Federal Register, Vol. 65, No. 211, on October 31, 2000, (Pages 65018-65024) as part of the consolidated line item improvement process (CLIP).

Applicability of Published Safety Evaluation

Southern Nuclear Operating Company (SNC) has reviewed the safety evaluation published as part of the CLIP. This verification included a review of the NRC staff's evaluation as well as the supporting information provided to support TSTF-366 (i.e., WCAP-14986-A, Revision 2, “Post Accident Sampling System Requirements: A Technical Basis,” submitted October 26, 1998, as supplemented by letters dated April 28, 1999, April 10, 2000, and May 22, 2000.) SNC has concluded that the justifications presented in TSTF-366 and the safety evaluation prepared by the NRC staff are applicable to VEGP and justify this amendment for the incorporation of the changes to the VEGP TS.

Optional Changes and Variations

SNC is not proposing any variations or deviations from the TS changes described in TSTF-366 or the NRC staff's model safety evaluation published on October 31, 2000.

The VEGP TS include an administrative requirement for a program to minimize the leakage from those portions of systems outside containment that contain highly radioactive fluids during a serious transient or accident. The PASS is specifically listed in TS 5.5.2 (Post Accident Processing System) as falling under the scope of this requirement. As described in the staff's model safety evaluation published on October 31, 2000, SNC is proposing to implement a modification such that the PASS would not be a potential leakage path outside containment. However, this modification may not be made during the implementation period for this amendment. As such, TS 5.5.2 is revised to add the phrase “(until such time as a modification eliminates the Post Accident Processing System as a potential leakage path)”. The above phrase makes clear that TS 5.5.2 remains applicable to the PASS as long as it is a possible leakage

Enclosure 1
Vogtle Electric Generating Plant
Request to Revise Technical Specifications
Primary Coolant Sources Outside Containment
Post Accident Sampling System

Basis for Proposed Change

path and reflects that the actual modification of the piping system may be scheduled beyond the implementation period for this amendment.

The elimination of the PASS results in changes to the discussion in the Bases section for TS 3.3.3, "PAM Instrumentation." The current Bases mention the capability of the PASS as a backup for monitoring hydrogen concentration within containment in the event that two hydrogen monitor channels are inoperable. Proposed changes to the Bases for TS 3.3.3 are contained in Enclosure 2.

No Significant Hazards Determination

SNC has reviewed the no significant hazards consideration (NSHC) determination published as part of the CLIP. SNC has concluded that the NSHC determination presented in the Federal Register on October 31, 2000, (65 FR 65018) is applicable to VEGP, and the NSHC determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

Verification and Commitments

As discussed in 65 FR 65018, the following plant-specific verifications were performed:

1. SNC has developed contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump, and containment atmosphere. A description of the contingency plans will be contained in the VEGP Emergency Plan. Establishment of contingency plans is considered a regulatory commitment.
2. The capability for classifying fuel damage events at the Alert level threshold has been established at 2-5% fuel clad damage. This level of core damage is associated with radioactivity levels of 300 $\mu\text{Ci/cc}$ dose equivalent iodine. This capability will be described in emergency plan implementing procedures and implemented with the license amendment. The capability for classifying fuel damage events is considered a regulatory commitment.
3. SNC has established the capability to monitor radioactive iodines that have been released to offsite environs. This capability is described in our emergency plan implementing procedures and is considered a regulatory commitment.

Environmental Evaluation

SNC has reviewed the environmental evaluation included with the model safety evaluation published on October 31, 2000. SNC has determined that the staff's findings presented in that evaluation are applicable to VEGP, and the evaluation is hereby incorporated by reference for this application.

Enclosure 2
Vogtle Electric Generating Plant
Request to Revise Technical Specifications
Primary Coolant Sources Outside Containment
Post Accident Sampling System

Marked-up TS and Bases Pages

5.5 Programs and Manuals

5.5.1 Offsite Dose Calculation Manual (ODCM) (continued)

that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include:

- 1) Residual Heat Removal System;
- 2) Containment Spray System;
- 3) Safety Injection (excluding Boron Injection and Accumulators);
- 4) Chemical and Volume Control System (Letdown and Charging Systems);
- 5) Post Accident Processing System (*until such time as a modification eliminates the Post Accident Processing System as a potential leakage path*);
- 6) Gaseous Waste Processing System; and
- 7) Nuclear Sampling System (Pressurizer steam and liquid sampling lines, Reactor Coolant sample lines, RHR sample lines, CVCS Demineralizer and Letdown Heat Exchanger sample lines only).

The program shall include the following:

- a. Preventive maintenance and periodic visual inspection requirements; and
- b. Leak test requirements for each system at least once per 18 months. The provisions of SR 3.0.2 are applicable

5.5.3

Post Accident Sampling

This program provides controls that ensure the capability to obtain and analyze reactor coolant, radioactive gases and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

- a. Training of personnel;

Not Used.

(continued)

5.5 Programs and Manuals

5.5.3

| | |
|---|--|
| Post Accident Sampling (continued) | |
| b. | Procedures for sampling and analysis; and |
| c. | Provisions for maintenance of sampling and analysis equipment. |

5.5.4

Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;
- b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to ten times the concentrations stated in 10 CFR 20, Appendix B (to paragraphs 20.1001-20.2401), Table 2, Column 2;
- c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM;
- d. Limitations on the annual and quarterly doses or dose commitment to a member of the public from radioactive materials in liquid effluents released from each unit to unrestricted areas, conforming to 10 CFR 50, Appendix I;
- e. Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days;
- f. Limitations on the functional capability and use of the liquid and gaseous effluent treatment systems to ensure that

(continued)

BASES

ACTIONS
(continued)

I.1

Condition I applies when two hydrogen monitor channels are inoperable. Required Action I.1 requires restoring one hydrogen monitor channel to OPERABLE status within 72 hours. The 72 hour Completion Time is reasonable based on the backup capability of the Post Accident Sampling System to monitor the hydrogen concentration for evaluation of core damage and to provide information for operator decisions. Also, it is unlikely that a LOCA (which would cause core damage) would occur during this time.

because



J.1

If the Required Action and associated Completion Time of Conditions H or I are not met and Table 3.3.3-1 directs entry into Condition J, the unit must be brought to a MODE where the requirements of this LCO do not apply. To achieve this status, the unit must be brought to at least MODE 4 within 12 hours.

The allowed Completion Time is reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems. Condition J is modified by a Note that excludes the Containment Radiation and RVLIS Functions. These Functions are addressed by another Condition.

K.1

Alternate means of monitoring Reactor Vessel Water Level (RVLIS) and Containment Area Radiation are available. These alternate means may be temporarily installed if the normal PAM channel cannot be restored to OPERABLE status within the allotted time. If these alternate means are used, the Required Action is not to shut down the unit but rather to follow the directions of Specification 5.6.8, in the Administrative Controls section of the TS. The report provided to the NRC should discuss the alternate means used, describe the degree to which the alternate means are equivalent to the installed PAM channels, justify the areas

(continued)

Enclosure 3
Vogtle Electric Generating Plant
Request to Revise Technical Specifications
Primary Coolant Sources Outside Containment
Post Accident Sampling System

Clean-typed TS and Bases Pages

5.5 Programs and Manuals

5.5.1 Offsite Dose Calculation Manual (ODCM) (continued)

that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include:

- 1) Residual Heat Removal System;
- 2) Containment Spray System;
- 3) Safety Injection (excluding Boron Injection and Accumulators);
- 4) Chemical and Volume Control System (Letdown and Charging Systems);
- 5) Post Accident Processing System (until such time as a modification eliminates the Post Accident Processing System as a potential leakage path);
- 6) Gaseous Waste Processing System; and
- 7) Nuclear Sampling System (Pressurizer steam and liquid sampling lines, Reactor Coolant sample lines, RHR sample lines, CVCS Demineralizer and Letdown Heat Exchanger sample lines only).

The program shall include the following:

- a. Preventive maintenance and periodic visual inspection requirements; and
- b. Leak test requirements for each system at least once per 18 months. The provisions of SR 3.0.2 are applicable

5.5.3 Not Used.

(continued)

5.5 Programs and Manuals

5.5.4 Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;
- b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to ten times the concentrations stated in 10 CFR 20, Appendix B (to paragraphs 20.1001-20.2401), Table 2, Column 2;
- c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM;
- d. Limitations on the annual and quarterly doses or dose commitment to a member of the public from radioactive materials in liquid effluents released from each unit to unrestricted areas, conforming to 10 CFR 50, Appendix I;
- e. Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days;
- f. Limitations on the functional capability and use of the liquid and gaseous effluent treatment systems to ensure that

(continued)

BASES

ACTIONS
(continued)

I.1

Condition I applies when two hydrogen monitor channels are inoperable. Required Action I.1 requires restoring one hydrogen monitor channel to OPERABLE status within 72 hours. The 72 hour Completion Time is reasonable because it is unlikely that a LOCA (which would cause core damage) would occur during this time.

J.1

If the Required Action and associated Completion Time of Conditions H or I are not met and Table 3.3.3-1 directs entry into Condition J, the unit must be brought to a MODE where the requirements of this LCO do not apply. To achieve this status, the unit must be brought to at least MODE 4 within 12 hours.

The allowed Completion Time is reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems. Condition J is modified by a Note that excludes the Containment Radiation and RVLIS Functions. These Functions are addressed by another Condition.

K.1

Alternate means of monitoring Reactor Vessel Water Level (RVLIS) and Containment Area Radiation are available. These alternate means may be temporarily installed if the normal PAM channel cannot be restored to OPERABLE status within the allotted time. If these alternate means are used, the Required Action is not to shut down the unit but rather to follow the directions of Specification 5.6.8, in the Administrative Controls section of the TS. The report provided to the NRC should discuss the alternate means used, describe the degree to which the alternate means are equivalent to the installed PAM channels, justify the areas

(continued)