Dominion Nuclear Connecticut, Inc.
Millstone Power Station
Rope Ferry Road
Waterford, CT 06385

Dominion

SEP 26 2001

Docket No. 50-336
B18481

RE: 10 CFR 50.90

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

Millstone Power Station, Unit No. 2
Response to a Request for Additional Information
Technical Specifications Change Request 2-3-01
Core Alteration and Refueling Operations

In a letter dated April 11, 2001,[1] Dominion Nuclear Connecticut, Inc. (DNC) submitted a license amendment request for the Millstone Unit No. 2 Technical Specifications relating to core alterations and refueling operations. On August 13, 2001,[2] a Request for Additional Information (RAI) was received via fax from the Nuclear Regulatory Commission which contains four (4) questions relating to the aforementioned license amendment request.

Attachment 1 provides the DNC response to the August 13, 2001, RAI. Attachments 2 and 3 provide revised markup pages and retyped pages for the proposed license amendment request. For your convenience, a complete set of markup and retyped pages reflecting all the proposed changes associated with this RAI response and the April 11, 2001, submittal are included.

The additional information provided in this letter will not affect the conclusions of the Safety Summary and Significant Hazards Consideration discussions provided in the DNC April 11, 2001, submittal.

There are no regulatory commitments contained within this letter.

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(1) R. P. Necci letter to U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 2, Technical Specifications Change Request 2-3-01, Core Alteration and Refueling Operations," dated April 11, 2001.

(2) John T. Harrison letter to Ravi Joshi, "Issues for Discussion in Upcoming Telephone Conference Related to Dominion Technical Specification Change Request 2-3-01, Dated April 11, 2001, Millstone 2 Core Alteration and Refueling Operations Definitions, TAC MB1779," dated August 13, 2001.

A001

If you should have any questions on the above, please contact Mr. Ravi Joshi at (860) 440-2080.

Very truly yours,

DOMINION NUCLEAR CONNECTICUT, INC.

J. Alan Price, Vice President
Nuclear Technical Services - Millstone

Sworn to and subscribed before me

this 26 day of September, 2001

Donna Lynne Williams
Notary Public

My Commission expires Nov 30, 2001

Attachments (3)

cc: H. J. Miller, Region I Administrator
J. T. Harrison, NRC Project Manager, Millstone Unit No. 2
NRC Senior Resident Inspector, Millstone Unit No. 2

Director
Bureau of Air Management
Monitoring and Radiation Division
Department of Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

Docket No. 50-336
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Attachment 1

Millstone Power Station, Unit No. 2

Response to a Request for Additional Information
Technical Specifications Change Request 2-3-01
Core Alteration and Refueling Operations

Response to a Request for Additional Information
Technical Specifications Change Request 2-3-01
Core Alteration and Refueling Operations

Question 1: *Item 3.b of the license amendment request proposes to divide TS 3.9.2 ACTION statement into two statements, ACTION 'a' and ACTION 'b'. ACTION 'b' will address the inoperability of two source range neutron flux monitors and will require that the boron concentration of the RCS be verified to satisfy the requirements of LCO 3.9.1 within 4 hours and at least once per 12 hours thereafter. Your application states that, "These changes will ensure that immediate action is taken to restore at least one monitor..." However, the proposed change does not include any action to restore at least one monitor. NUREG-1432 Revision 2 STS 3.9.2 ACTION B requires the immediate initiation action to restore one SRM to OPERABLE status in addition to verifying the boron concentration. Please provide justification why STS Action B.1 is not included in your request.*

Response: Dominion Nuclear Connecticut, Inc. (DNC) agrees with the reviewer's comment. DNC proposes to add an additional requirement to TECHNICAL SPECIFICATION 3.9.2 Action "b" to require immediate action to restore at least one monitor to OPERABLE status. The revised action statement will read "With both of the above required monitors inoperable, immediately initiate action to restore one monitor to OPERABLE status. Additionally, determine that the boron concentration of the Reactor Coolant System satisfies the requirements of LCO 3.9.1 within 4 hours and at least once per 12 hours thereafter." This is a more conservative change. The revised insert 'B' to page 3/4 9-2 (Technical Specification 3.9.2) reflecting these changes is provided in Attachment 2.

Question 2: *The marked up copy of current TS 3.9.2 shows the addition of the words, "and control room." in LCO 3.9.2. However, the propose change does not appear to be discussed in the submittal. Provide appropriate justification for the proposed change.*

Response: Technical Specification 3.9.2 currently requires two (2) Source Range Neutron Flux Monitors to be operating with continuous visual indication for both monitors in the control room, and audible indication for one monitor in the containment. LCO 3.9.2 is applicable in Mode 6. The existing LCO requirement only requires "audible indication in the containment" in Mode 6.

DNC proposes to add an additional requirement that audible indication for one monitor also be required in the control room. Technical Specification 3.9.2 requires audible indication in the containment at all times in Mode 6. However, personnel are not required to be present in containment at all times when in Mode 6. The Technical Specifications only require a licensed Senior Reactor Operator (or Senior Reactor Operator Limited to

Fuel Handling) to be in containment to directly supervise core alterations. Providing audible in addition to visual indication in the control room will provide additional assurance that any increases in reactor core neutron flux levels during Mode 6 operations are identified in a timely manner. This change is consistent with NUREG 1432. This is a more conservative change.

Question 3: *Item 3.c of the license amendment request proposes to delete SR 3.9.2.a and 3.9.2.b and replace them with one surveillance requirement. SR 3.9.2.a and SR 3.9.2.b requires that each source range neutron flux monitor shall be demonstrated OPERABLE by performance of 1. A CHANNEL FUNCTIONAL TEST at least once per seven days and 2. A CHANNEL FUNCTIONAL TEST within eight hours prior to the start of CORE ALTERATIONS. The new surveillance requirement (SR 3.9.2.b) would require the performance of a channel calibration at least once per 18 months. The licensee stated that the channel functional test only provides indication of the neutron flux level in the core, while the channel calibration would ensure the instrument channels are properly aligned. Provide more information/justification as to why the channel calibration at an 18 month interval sufficiently replaces or improves the current surveillance requirements (SR 3.9.2.a and b) with surveillance intervals of 7 days and 8 hours prior to core alterations.*

Response: In the DNC original submittal for this license amendment request (dated April 11, 2001), DNC proposed that SRs 4.9.2.a and 4.9.2.b be replaced by one surveillance requirement to perform a channel calibration at least once per 18 months. The channel calibration will ensure the instrument channels are properly aligned, and the channel check will ensure the channels are functioning. As part of the performance of a channel calibration, a channel functional test is required.

Millstone Unit No. 2 Technical Specification 1.9 states: "A CHANNEL CALIBRATION shall be the adjustment, as necessary, of the channel output such that it responds with the necessary range and accuracy to known values of the parameter which the channel monitors. The CHANNEL CALIBRATION shall encompass the entire channel including the sensor and alarm and/or trip functions, and shall include the CHANNEL FUNCTIONAL TEST. The CHANNEL CALIBRATION may be performed by any series of sequential, overlapping or total channel steps such that the entire channel is calibrated."

Surveillance Requirement 4.3.1.1.1 (Table 4.3-1) provides the surveillance requirements for the Reactor Protective System, including the Wide Range Logarithmic Neutron Flux Monitors in Modes 3, 4 and 5. The Wide Range Logarithmic Neutron Flux Monitors are the same channels used for the Source Range Neutron Flux Monitors, and perform the same function in Mode 6 (including core alterations) as the Source Range Neutron Flux

Monitors perform in Modes 3, 4, and 5 - visual indication of reactor core neutron flux levels. The surveillance requirements for Modes 3, 4 and 5 are:

- CHANNEL CHECK on a per shift frequency (once per 12 hours);
- CHANNEL CALIBRATION on a refueling frequency (once per 18 months) - excluding the neutron detectors; and
- CHANNEL FUNCTIONAL TEST prior to each reactor startup - If not performed in previous 7 days.

The proposed surveillance requirements for the Source Range Neutron Flux Monitors in Mode 6 are consistent with the existing requirements for the Wide Range Logarithmic Neutron Flux Monitors in Modes 3, 4, and 5. Thus, the replacement of the 7 day and 8 hour CHANNEL FUNCTIONAL TEST surveillance requirements for the Source Range Neutron Flux Monitors with an 18 month CHANNEL CALIBRATION surveillance requirement (in conjunction with the existing per shift CHANNEL CHECK requirement) provides sufficient demonstration of the OPERABILITY of the channels during Mode 6.

Question 4: *Item 4 of the license amendment request proposes to change the LCO, APPLICABILITY and ACTION statement of TS 3.9.11. The propose wording of the ACTION statements states "immediately suspend CORE ALTERATIONS and immediately suspend movement of irradiated fuel assemblies with containment." The proposed ACTION statement does not state a condition with which the action is required, i.e., with the water level less than that specified above. The proposed ACTION statement needs to be revised to include a condition for which the action is taken.*

Response: DNC agrees with the reviewer's comment. DNC proposes to add a condition to which the action is required, i.e. "With the water level less than that specified above," for the Technical Specification 3.9.11 action statement. The revised insert 'F' to page 3/4 9-11 (Technical Specification 3.9.11) reflecting this change is provided in Attachment 2.

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Attachment 2

Millstone Power Station, Unit No. 2

Technical Specifications Change Request 2-3-01
Core Alteration and Refueling Operations
Marked Up Pages

DEFINITIONS

CORE ALTERATION

Replace with INSERT 'A'

1.12 CORE ALTERATION shall be the movement or manipulation of any component within the reactor pressure vessel with the vessel head removed and fuel in the vessel.

SHUTDOWN MARGIN

1.13 SHUTDOWN MARGIN shall be the instantaneous amount of reactivity by which the reactor is subcritical or would be subcritical from its present condition assuming all full length control element assemblies (shutdown and regulating) are fully inserted except for the single assembly of highest reactivity worth which is assumed to be fully withdrawn.

IDENTIFIED LEAKAGE

1.14 IDENTIFIED LEAKAGE shall be:

a. Leakage into closed systems, such as pump seal or valve packing leaks that are captured, and conducted to a sump or collecting tank, or

b. Leakage into the containment atmosphere from sources that are both specifically located and known either not to interfere with the operation of leakage detection systems or not to be PRESSURE BOUNDARY LEAKAGE.

UNIDENTIFIED LEAKAGE

1.15 UNIDENTIFIED LEAKAGE shall be all leakage which is not IDENTIFIED LEAKAGE or CONTROLLED LEAKAGE.

PRESSURE BOUNDARY LEAKAGE

1.16 PRESSURE BOUNDARY LEAKAGE shall be leakage (except steam generator tube leakage) through a non-isolable fault in a Reactor Coolant System component body, pipe wall or vessel wall.

CONTROLLED LEAKAGE

1.17 CONTROLLED LEAKAGE shall be the water flow from the reactor coolant pump seals.

INSERT 'A' TO PAGE 1-3

1.12 CORE ALTERATION shall be the movement of any fuel, sources, or reactivity control components within the reactor vessel with the vessel head removed and fuel in the vessel. Suspension of CORE ALTERATIONS shall not preclude completion of movement of a component to a safe position.

~~August 13, 1996~~

3/4.9.1 BORON CONCENTRATIONS

LIMITING CONDITION FOR OPERATION

3.9.1 With the reactor vessel head unbolted or removed, the boron concentration of the Reactor Coolant System** and the refueling canal shall be maintained sufficient to ensure that the more restrictive of following reactivity conditions is met:

a. Either a K_{eff} of 0.95 or less, or

b. A boron concentration of greater than or equal to 1720 ppm.

APPLICABILITY: MODE 6*.

ACTION:

With the requirements of the above specification not satisfied, within 15 minutes suspend all operations involving CORE ALTERATIONS or positive reactivity changes and initiate and continue boration at greater than or equal to 40 gpm of boric acid solution at or greater than the required refueling water storage tank concentration (ppm) until K_{eff} is reduced to less than or equal to 0.95 or the boron concentration is restored to greater than or equal to 1720 ppm, whichever is the more restrictive. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.9.1.1 The more restrictive of the above two reactivity conditions shall be determined prior to:

a. Removing or unbolting the reactor vessel head, and

b. Withdrawal of any full length CEA in excess of 3 feet from its fully inserted position within the reactor pressure vessel.

4.9.1.2 The boron concentration of the reactor coolant system** and the refueling canal shall be determined by chemical analysis at least once per 72 hours.

4.9.1.3 The boron concentration in the cold leg side of the steam generators shall be determined to be greater than or equal to 1300 ppm prior to entering MODE 6.

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*The reactor shall be maintained in MODE 6 whenever the reactor vessel head is unbolted or removed and fuel is in the reactor vessel.

**For the Cycle 13 mid-cycle core offload activities, it is acceptable for the boron concentration of the water volumes in the steam generators and connecting piping to be as low as 1300 ppm.

INSERT '1' TO APPLICABILITY Page 3/4 9-1

NOTE Only applicable to the refueling canal when connected to the Reactor Coolant System

3/4.9 REFUELING OPERATIONS

The ACTION requirements to immediately suspend various activities (CORE ALTERATIONS, fuel movement, CEA movement, etc.) do not preclude completion of the movement of a component to a safe position.

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) sufficient 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 accident analyses. Reactivity control in the water volume having direct access to the reactor vessel is achieved by determining boron concentration in the refueling canal. The refueling canal is defined as the entire length of pool stretching from refuel pool through transfer canal to spent fuel pool.

INSERT 2

Delete

For the Cycle 13 mid-cycle core offload activities, the boron concentration of the water volumes in the steam generators and connecting piping may be as low as 1300 ppm. During REFUELING and/or CORE ALTERATIONS, the water volumes in the steam generators and connecting piping are stagnant and do not readily mix with the water in the reactor vessel. The water volumes in the pressurizer and connecting piping, shutdown cooling system (including reactor vessel and connecting piping), and refueling pool shall be maintained greater than 1950 ppm.

A boron dilution analysis has been performed which accounts for dilution of the shutdown cooling system with the water volumes from the steam generators and connecting piping. This analysis demonstrates that, in the unlikely event in which all of the water in the steam generators and connecting piping mixes with the water in the shutdown cooling system, the resulting shutdown cooling system boron concentration will remain greater than the required refueling boron concentration.

The surveillance requirement to verify that the boron concentration in the steam generators is greater than 1300 ppm prior to entering MODE 6 is consistent with the assumptions of the boron dilution calculation. The sample points are only located on the cold leg side of the steam generators. These sample points are representative of the water volumes in the steam generators (both hot and cold legs) and their connecting piping, based on the fact that uniform mixing of these water volumes at a boron concentration of approximately 1320 ppm had occurred prior to shutting off the reactor coolant pumps. In March 1996, the reactor coolant system was drained and subsequently refilled with water having a boron concentration greater than or equal to 1320 ppm. The boron concentration of the water in the steam generators and connecting piping is greater than 1300 ppm.

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.

INSERT '2' TO PAGE B 3/4 9-1

The applicability is modified by a Note. The Note states that the limits on boron concentration are only applicable to the refueling canal when this volume is connected to the Reactor Coolant system (RCS). When the refueling canal is isolated from the RCS, no potential path for boron dilution exists. Prior to re-connecting portions of the refueling canal to the RCS, Surveillance 4.9.1.2 must be met. If any dilution activity has occurred while the refueling canal was disconnected from the RCS, this surveillance ensures the correct boron concentration prior to communication with the RCS.

~~August 1, 1975~~

REFUELING OPERATIONS

INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.9.2 As a minimum, two source range neutron flux monitors shall be ~~operating~~ OPERABLE, each with continuous visual indication in the control room and one with audible indication in the containment and control room.

APPLICABILITY: MODE 6.

ACTION:

With the requirements of the above specification not satisfied, immediately suspend all operations involving CORE ALTERATIONS or positive reactivity changes.

SURVEILLANCE REQUIREMENTS

4.9.2 Each source range neutron flux monitor shall be demonstrated OPERABLE by performance of:

a. A CHANNEL FUNCTIONAL TEST at least once per 7 days.

b. A CHANNEL FUNCTIONAL TEST within 8 hours prior to the start of CORE ALTERATIONS, and

c. A CHANNEL CHECK at least once per 12 hours ~~during CORE ALTERATIONS.~~

A CHANNEL CALIBRATION at least once per 18 months *

* Neutron detectors are excluded from ~~the~~ CHANNEL CALIBRATION

INSERT 'B' TO PAGE 3/4 9-2

a. With one of the above required monitors inoperable, immediately suspend all operations involving CORE ALTERATIONS or positive reactivity additions.

b. With both of the above required monitors inoperable, immediately initiate action to restore one monitor to OPERABLE status. Additionally, determine that the boron concentration of the Reactor Coolant System satisfies the requirements of LCO 3.9.1 within 4 hours and at least once per 12 hours thereafter.

REFUELING OPERATIONS

~~2-19-19~~

WATER LEVEL - REACTOR VESSEL

LIMITING CONDITION FOR OPERATION

3.9.11 As a minimum, 23.0 feet of water shall be maintained over the top of the reactor ~~pressure~~ vessel ~~while irradiated fuel assemblies seated within the reactor pressure vessel~~.

Change → Delete

APPLICABILITY: DURING MOVEMENT OF FUEL WITHIN THE REACTOR PRESSURE VESSEL.

ACTION:

With the requirements of the above specification not satisfied, suspend all operations involving movement of fuel within the pressure vessel.

INSERT F

SURVEILLANCE REQUIREMENTS

4.9.11 The water level shall be determined to be within its minimum depth ~~within 2 hours prior to the start of fuel movement within the reactor pressure vessel~~ and at least once per ~~7 days thereafter~~.

Delete

24 hours

INSERT 'F' - PAGE 3/4 9-11

APPLICABILITY: During CORE ALTERATIONS, except during latching and unlatching of control rod drive shafts.

During movement of irradiated fuel assemblies within containment.

ACTION: With the water level less than that specified above, immediately suspend CORE ALTERATIONS and immediately suspend movement of irradiated fuel assemblies within containment.

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Attachment 3

Millstone Power Station, Unit No. 2

Technical Specifications Change Request 2-3-01
Core Alteration and Refueling Operations
Retyped Pages

CORE ALTERATION

1.12 CORE ALTERATION shall be the movement of any fuel, sources, or reactivity control components within the reactor vessel with the vessel head removed and fuel in the vessel. Suspension of CORE ALTERATIONS shall not preclude completion of movement of a component to a safe position.

SHUTDOWN MARGIN

1.13 SHUTDOWN MARGIN shall be the instantaneous amount of reactivity by which the reactor is subcritical or would be subcritical from its present condition assuming all full length control element assemblies (shutdown and regulating) are fully inserted except for the single assembly of highest reactivity worth which is assumed to be fully withdrawn.

IDENTIFIED LEAKAGE

1.14 IDENTIFIED LEAKAGE shall be:

a. Leakage into closed systems, such as pump seal or valve packing leaks that are captured, and conducted to a sump or collecting tank, or

b. Leakage into the containment atmosphere from sources that are both specifically located and known either not to interfere with the operation of leakage detection systems or not to be PRESSURE BOUNDARY LEAKAGE.

UNIDENTIFIED LEAKAGE

1.15 UNIDENTIFIED LEAKAGE shall be all leakage which is not IDENTIFIED LEAKAGE or CONTROLLED LEAKAGE.

PRESSURE BOUNDARY LEAKAGE

1.16 PRESSURE BOUNDARY LEAKAGE shall be leakage (except steam generator tube leakage) through a non-isolable fault in a Reactor Coolant System component body, pipe wall or vessel wall.

CONTROLLED LEAKAGE

1.17 CONTROLLED LEAKAGE shall be the water flow from the reactor coolant pump seals.

3/4.9 REFUELING OPERATIONS

3/4.9.1 BORON CONCENTRATIONS

LIMITING CONDITION FOR OPERATION

3.9.1 The boron concentration of all filled portions of the Reactor Coolant System and the refueling canal shall be maintained sufficient to ensure that the more restrictive of following reactivity conditions is met:

a. Either a K_{eff} of 0.95 or less, or

b. A boron concentration of greater than or equal to 1720 ppm.

APPLICABILITY: MODE 6.

NOTE
Only applicable to the refueling canal when connected to the Reactor Coolant System

ACTION:

With the requirements of the above specification not satisfied, within 15 minutes suspend all operations involving CORE ALTERATIONS or positive reactivity changes and initiate and continue boration at greater than or equal to 40 gpm of boric acid solution at or greater than the required refueling water storage tank concentration (ppm) until K_{eff} is reduced to less than or equal to 0.95 or the boron concentration is restored to greater than or equal to 1720 ppm, whichever is the more restrictive.

SURVEILLANCE REQUIREMENTS

4.9.1.1 The more restrictive of the above two reactivity conditions shall be determined prior to:

a. Removing or unbolting the reactor vessel head, and

b. Withdrawal of any full length CEA in excess of 3 feet from its fully inserted position within the reactor pressure vessel.

4.9.1.2 The boron concentration of all filled portions of the reactor coolant system and the refueling canal shall be determined by chemical analysis at least once per 72 hours.

4.9.1.3 Deleted

3/4.9 REFUELING OPERATIONS

The ACTION requirements to immediately suspend various activities (CORE ALTERATIONS, fuel movement, CEA movement, etc.) do not preclude completion of the movement of a component to a safe position.

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) sufficient 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 accident analyses. Reactivity control in the water volume having direct access to the reactor vessel is achieved by determining boron concentration in the refueling canal. The refueling canal is defined as the entire length of pool stretching from refuel pool through transfer canal to spent fuel pool.

The applicability is modified by a Note. The Note states that the limits on boron concentration are only applicable to the refueling canal when this volume is connected to the Reactor Coolant System (RCS). When the refueling canal is isolated from the RCS, no potential path for boron dilution exists. Prior to re-connecting portions of the refueling canal to the RCS, Surveillance 4.9.1.2 must be met. If any dilution activity has occurred while the refueling canal was disconnected from the RCS, this surveillance ensures the correct boron concentration prior to communication with the RCS.

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.

REFUELING OPERATIONS

INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.9.2 Two source range neutron flux monitors shall be OPERABLE, each with continuous visual indication in the control room and one with audible indication in the containment, and control room.

APPLICABILITY: MODE 6.

ACTION:

a. With one of the above required monitors inoperable, immediately suspend all operations involving CORE ALTERATIONS or positive reactivity additions.

b. With both of the above required monitors inoperable, immediately initiate action to restore one monitor to OPERABLE status. Additionally, determine that the boron concentration of the Reactor Coolant System satisfies the requirements of LCO 3.9.1 within 4 hours and at least once per 12 hours thereafter.

SURVEILLANCE REQUIREMENTS

4.9.2 Each source range neutron flux monitor shall be demonstrated OPERABLE by performance of:

a. Deleted

b. A CHANNEL CALIBRATION at least once per 18 months*

c. A CHANNEL CHECK and verification of audible counts at least once per 12 hours.

*Neutron detectors are excluded from CHANNEL CALIBRATION.

REFUELING OPERATIONS

WATER LEVEL - REACTOR VESSEL

LIMITING CONDITION FOR OPERATION

3.9.11 As a minimum, 23.0 feet of water shall be maintained over the top of the reactor vessel flange.

APPLICABILITY: During CORE ALTERATIONS, except during latching and unlatching of control rod drive shafts.

During movement of irradiated fuel assemblies within containment.

ACTION:

With the water level less than that specified above, immediately suspend CORE ALTERATIONS and immediately suspend movement of irradiated fuel assemblies within containment.

SURVEILLANCE REQUIREMENTS

4.9.11 The water level shall be determined to be within its minimum depth at least once per 24 hours.