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RS-02-047

10 CFR 50.90

March 1, 2002

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Clinton Power Station, Unit 1  
Facility Operating License No. NPF-62  
NRC Docket No. 50-461

**Subject:** Supplemental Information Supporting a License Amendment Request to Revise Plant System Requirements During Fuel Handling Based on Alternative Source Term

**Reference:** Letter from J. M. Heffley (AmerGen Energy Company, LLC) to U.S. NRC, "Request for Amendment to Technical Specifications that Revise Plant System Requirements During Fuel Handling Based on Alternative Source Term," dated July 5, 2001

In the referenced letter, AmerGen Energy Company (AmerGen), LLC submitted a request for changes to Appendix A, Technical Specifications (TS), of Facility Operating License No. NPF-62 for Clinton Power Station (CPS). The proposed changes would revise requirements that apply during the movement of irradiated fuel and during Core Alterations. The NRC requested additional information in a telephone conversation regarding the proposed changes in the above reference.

AmerGen is submitting a supplement to the referenced letter. This supplement includes revisions to the Applicability, Conditions and Required Actions associated with movement of "recently" irradiated fuel assemblies in primary and secondary containment. The changes to the wording in the TS and TS Bases are being made to better align the requested changes with the wording in Technical Specifications Task Force (TSTF) Traveler TSTF-51, "Revise containment requirements during handling irradiated fuel and core alterations," Revision 2, dated October 1999. Attachment A to this letter provides the NRC requested information.

In addition to the above proposed changes, CPS has committed to the provisions of Nuclear Utilities Management and Resources Council (NUMARC) document NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," Revision 3, consistent with TSTF-51. NUMARC 93-01 provides recommendations on the need to initiate actions to verify and/or re-establish secondary containment, and if needed, primary containment, in the event of a dropped fuel assembly.

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This supplemental information has been reviewed against the No Significant Hazards Consideration and the Environmental Assessment provided in the referenced letter above and we have concluded that there is no impact to the conclusions reached therein.

Attachment A to this letter provides the proposed changes to the TS and the TS Bases. The changes to the TS Bases are provided for information only. These changes will be implemented upon approval of the proposed TS changes, in accordance with the CPS TS Bases Control Program.

Should you have any questions related to this information, please contact Mr. Timothy A. Byam at (630) 657-2804.

Respectfully,

*J.W. Simpkin*  
*for* Keith R. Jury  
Director – Licensing  
Mid-West Regional Operating Group

Attachments:

Affidavit  
Attachment A: Proposed Technical Specification Changes

cc: Regional Administrator – NRC Region III  
NRC Senior Resident Inspector – Clinton Power Station  
Office of Nuclear Facility Safety – Illinois Department of Nuclear Safety

STATE OF ILLINOIS )  
COUNTY OF DUPAGE )  
IN THE MATTER OF )  
AMERGEN ENERGY COMPANY, LLC ) Docket Number  
CLINTON POWER STATION, UNIT 1 ) 50-461

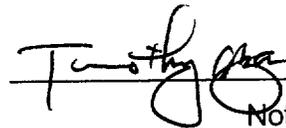
**SUBJECT: Supplemental Information Supporting a License Amendment  
Request to Revise Plant System Requirements During Fuel handling  
Based on Alternative Source term**

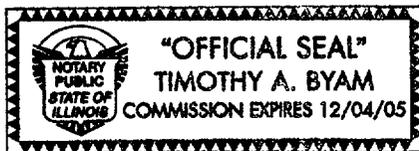
**AFFIDAVIT**

I affirm that the content of this transmittal is true and correct to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
T. W. Simpkin  
Manager – Licensing

Subscribed and sworn to before me, a Notary Public in and  
for the State above named, this 1<sup>st</sup> day of  
March, 2002.

  
\_\_\_\_\_  
Notary Public



**ATTACHMENT A**  
**Proposed Technical Specification Changes**  
**Clinton Power Station, Unit 1**

REVISED TS PAGES

3.3-53	3.3-57	3.3-59
3.3-64	3.6-3	3.6-7
3.6-9	3.6-14	3.6-15
3.6-43	3.6-44	3.6-47
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REVISED BASES PAGES  
(PROVIDED FOR INFORMATION ONLY)

B 3.3-146a	B 3.3-148	B 3.3-157
B 3.3-158	B 3.3-169	B 3.3-179
B 3.3-180	B 3.6-8	B 3.6-12
B 3.6-13	B 3.6-22	B 3.6-22a
B 3.6-25	B 3.6-85	B 3.6-86
B 3.6-87	B 3.6-90	B 3.6-91
B 3.6-93	B 3.6-98	B 3.6-99
		B 3.6-100

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>N. As required by Required Action F.1 and referenced in Table 3.3.6.1-1.</p>	<p>N.1 Isolate the affected penetration flow path(s).</p>	<p>Immediately</p>
	<p><u>OR</u></p>	
	<p><del>N.2.1 Suspend CORE ALTERATIONS.</del></p>	<p><del>Immediately</del></p>
	<p><u>AND</u></p>	
	<p>N.2.1 Suspend movement of <b>recently</b> irradiated fuel assemblies in the primary and secondary containment.</p>	<p>Immediately</p>
	<p><u>AND</u></p>	
	<p>N.2.2 Initiate action to suspend operations with a potential for draining the reactor vessel.</p>	<p>Immediately</p>
<p>O. As required by Required Action F.1 and referenced in Table 3.3.6.1-1.</p>	<p>O.1 Isolate the affected penetration flow path(s).</p>	<p>Immediately</p>
	<p><u>OR</u></p>	
	<p>O.2 Initiate action to suspend operations with a potential for draining the reactor vessel.</p>	<p>Immediately</p>

Primary Containment and Drywell Isolation Instrumentation  
3.3.6.1

Table 3.3.6.1-1 (page 3 of 6)  
Primary Containment and Drywell Isolation Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION F.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
2. Primary Containment and Drywell Isolation (continued)					
g. Containment Building Fuel Transfer Pool Ventilation Plenum Radiation-High	(c), (d)	4	N	SR 3.3.6.1.1	≤ 500 mR/hr
				SR 3.3.6.1.2	
				SR 3.3.6.1.5	
				SR 3.3.6.1.6	
h. Containment Building Exhaust Radiation-High	1,2,3	4 <sup>(b)</sup>	I	SR 3.3.6.1.1	≤ 400 mR/hr
				SR 3.3.6.1.2	
				SR 3.3.6.1.5	
				SR 3.3.6.1.6	
	(c), (d)	4	N	SR 3.3.6.1.1	≤ 400 mR/hr
				SR 3.3.6.1.2	
				SR 3.3.6.1.5	
				SR 3.3.6.1.6	
i. Containment Building Continuous Containment Purge (CCP) Exhaust Radiation-High	1,2,3	4 <sup>(b)</sup>	I	SR 3.3.6.1.1	≤ 400 mR/hr
				SR 3.3.6.1.2	
				SR 3.3.6.1.5	
				SR 3.3.6.1.6	
	(c), (d)	4	N	SR 3.3.6.1.1	≤ 400 mR/hr
				SR 3.3.6.1.2	
				SR 3.3.6.1.5	
				SR 3.3.6.1.6	
j. Reactor Vessel Water Level-Low Low Low, Level 1	1,2,3	4 <sup>(b)</sup>	I	SR 3.3.6.1.1	≥ -147.7 inches
				SR 3.3.6.1.2	
				SR 3.3.6.1.3	
				SR 3.3.6.1.5	
	(c)	4	O	SR 3.3.6.1.1	≥ -147.7 inches
				SR 3.3.6.1.2	
				SR 3.3.6.1.3	
				SR 3.3.6.1.5	
k. Containment Pressure-High	(e)	2	I	SR 3.3.6.1.1	≤ 3.0 psid
				SR 3.3.6.1.2	
				SR 3.3.6.1.5	
				SR 3.3.6.1.6	
l. Manual Initiation	1,2,3	2 <sup>(b)</sup>	J	SR 3.3.6.1.6	NA
	(c), (d)	2	N	SR 3.3.6.1.6	NA

(continued)

(b) Also required to initiate the associated drywell isolation function.

(c) During operations with a potential for draining the reactor vessel.

(d) During ~~CORE ALTERATIONS~~ and during movement of recently irradiated fuel assemblies in the primary or secondary containment.

(e) MODES 1, 2, and 3 with the associated PCIVs not closed.

Primary Containment and Drywell Isolation Instrumentation  
3.3.6.1

Table 3.3.6.1-1 (page 5 of 6)  
Primary Containment and Drywell Isolation Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION F.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
3. RCIC System Isolation (continued)					
j. Drywell Pressure - High	1,2,3	2	I	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.3 SR 3.3.6.1.5 SR 3.3.6.1.6	≤ 1.88 psig
k. Manual Initiation	1,2,3	2	J	SR 3.3.6.1.6	NA
4. Reactor Water Cleanup (RWCU) System Isolation					
a. Differential Flow - High	1,2,3	2	I	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.5 SR 3.3.6.1.6	≤ 66.1 gpm
b. Differential Flow-Timer	1,2,3	2	I	SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.6	≤ 47 seconds
c. RWCU Heat Exchanger Equipment Room Temperature-High	1,2,3	2 per room	I	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.5 SR 3.3.6.1.6	≤ 205°F
d. RWCU Pump Rooms Temperature-High	1,2,3	2 per room	I	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.5 SR 3.3.6.1.6	≤ 202°F
e. Main Steam Line Tunnel Ambient Temperature- High	1,2,3	2	I	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.5 SR 3.3.6.1.6	≤ 171°F
f. Reactor Vessel Water Level-Low Low, Level 2	1,2,3	4	I	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.3 SR 3.3.6.1.5 SR 3.3.6.1.6	≥ -47.7 inches ≥ -45.9 inches
	(c)	4	O	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.3 SR 3.3.6.1.5 SR 3.3.6.1.6	≥ -47.7 inches
g. Standby Liquid Control System Initiation	1,2	2	L	SR 3.3.6.1.6	NA
h. Manual Initiation	1,2,3	2	J	SR 3.3.6.1.6	NA
	(c), (d)	2	N	SR 3.3.6.1.6	NA

(continued)

(c) During operations with a potential for draining the reactor vessel.

(d) During ~~core alterations and during~~ movement of recently irradiated fuel assemblies in the primary or secondary containment.

Secondary Containment Isolation Instrumentation  
3.3.6.2

Table 3.3.6.2-1 (page 1 of 1)  
Secondary Containment Isolation Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Reactor Vessel Water Level-Low Low, Level 2	1,2,3, (a)	2	SR 3.3.6.2.1 SR 3.3.6.2.2 SR 3.3.6.2.3 SR 3.3.6.2.4 SR 3.3.6.2.5	≥ -47.7 inches   ≥ -45.9 inches
2. Drywell Pressure-High	1,2,3	2	SR 3.3.6.2.1 SR 3.3.6.2.2 SR 3.3.6.2.3 SR 3.3.6.2.4 SR 3.3.6.2.5	≤ 1.88 psig
3. Containment Building Fuel Transfer Pool Ventilation Plenum Exhaust Radiation-High	(a), (b)	2	SR 3.3.6.2.1 SR 3.3.6.2.2 SR 3.3.6.2.4 SR 3.3.6.2.5	≤ 500 mR/hr
4. Containment Building Exhaust Radiation-High	1,2,3, (a), (b)	2	SR 3.3.6.2.1 SR 3.3.6.2.2 SR 3.3.6.2.4 SR 3.3.6.2.5	≤ 400 mR/hr
5. Containment Building Continuous Containment Purge (CCP) Exhaust Radiation-High	1,2,3, (a), (b)	2	SR 3.3.6.2.1 SR 3.3.6.2.2 SR 3.3.6.2.4 SR 3.3.6.2.5	≤ 400 mR/hr
6. Fuel Building Exhaust Radiation-High	1,2,3, (c)	2	SR 3.3.6.2.1 SR 3.3.6.2.2 SR 3.3.6.2.4 SR 3.3.6.2.5	≤ 17 mR/hr
7. Manual Initiation	1,2,3, (a), (b)	1	SR 3.3.6.2.5	NA

(a) During operations with a potential for draining the reactor vessel.

(b) During ~~CODE ALTERATIONS and during~~ movement of recently irradiated fuel assemblies in the primary or secondary containment.

(c) During movement of recently irradiated fuel assemblies in the fuel building.

3.6 CONTAINMENT SYSTEMS

3.6.1.2 Primary Containment Air Locks

LCO 3.6.1.2 Each primary containment air lock shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,

-----NOTE-----  
The following Applicabilities apply only to the upper  
containment personnel air lock.  
-----

~~During CORE ALTERATIONS,~~  
During movement of **recently** irradiated fuel assemblies in the  
primary or secondary containment,  
During operations with a potential for draining the reactor  
vessel (OPDRVs).

ACTIONS

- NOTES-----
1. Entry and exit is permissible to perform repairs of the affected air lock components.
  2. Separate Condition entry is allowed for each air lock.
  3. Enter applicable Conditions and Required Actions of LCO 3.6.1.1, "Primary Containment," when air lock leakage results in exceeding overall containment leakage rate acceptance criteria in MODES 1, 2, and 3.
- 

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. Required Action and associated Completion Time of Condition A, B, or C not met during movement of <b>recently</b> irradiated fuel assemblies in the primary or secondary containment, <del>CORE ALTERATIONS</del> , or OPDRVs.	-----NOTE----- LCO 3.0.3 is not applicable. -----	
	E.1 Suspend movement of <b>recently</b> irradiated fuel assemblies in the primary and secondary containment.	Immediately
	<del>E.2 Suspend CORE ALTERATIONS.</del>	<del>Immediately</del>
	AND E.2 Initiation action to suspend OPDRVs.	Immediately

3.6 CONTAINMENT SYSTEMS

3.6.1.3 Primary Containment Isolation Valves (PCIVs)

LCO 3.6.1.3 Each PCIV shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,  
MODES 4 and 5 for RHR Shutdown Cooling System suction from  
the reactor vessel isolation valves when associated  
isolation instrumentation is required to be OPERABLE per  
LCO 3.3.6.1, "Primary Containment and Drywell Isolation  
Instrumentation," Function 5.c.

-----NOTE-----  
The following Applicabilities apply only to secondary  
containment bypass leakage isolation valves.  
-----

~~During CORE ALTERATIONS,~~  
During movement of **recently** irradiated fuel assemblies in the  
primary or secondary containment,  
During operations with a potential for draining the reactor  
vessel (OPDRVs).

ACTIONS

- NOTES-----
1. Penetration flow paths may be unisolated intermittently under administrative controls.
  2. Separate Condition entry is allowed for each penetration flow path.
  3. Enter applicable Conditions and Required Actions for systems made inoperable by PCIVs.
  4. Enter applicable Conditions and Required Actions of LCO 3.6.1.1, "Primary Containment," when PCIV leakage results in exceeding overall containment leakage rate acceptance criteria in MODES 1, 2, and 3.
- 

(continued)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. (continued)	D.3 Perform SR 3.6.1.3.5 for the resilient seal purge valves closed to comply with Required Action D.1.	Once per 92 days
E. Required Action and associated Completion Time of Condition A, B, C, or D not met in MODE 1, 2, or 3.	E.1 Be in MODE 3. <u>AND</u> E.2 Be in MODE 4.	12 hours  36 hours
F. Required Action and associated Completion Time of Condition A, B, C, or D not met for PCIV(s) required to be OPERABLE during movement of <b>recently</b> irradiated fuel assemblies in the primary or secondary containment.	F.1 -----NOTE----- LCO 3.0.3 is not applicable. -----  Suspend movement of <b>recently</b> irradiated fuel assemblies in primary and secondary containment.	Immediately
<del>G. Required Action and associated Completion Time of Condition A, B, C, or D not met for PCIV(s) required to be OPERABLE during CORE ALTERATIONS.</del>	<del>G.1 Suspend CORE ALTERATIONS.</del>	<del>Immediately</del>

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>G. Required Action and associated Completion Time of Condition A, B, C, or D not met for PCIV(s) required to be OPERABLE during MODE 4 or 5 or during OPDRVs.</p>	<p>G.1 Initiate action to suspend OPDRVs.</p> <p><u>OR</u></p> <p>G.2 Initiate action to restore valve(s) to OPERABLE status.</p>	<p>Immediately</p> <p>Immediately</p>

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.6.1.3.1 -----NOTES-----</p> <ol style="list-style-type: none"> <li>1. Only required to be met in MODES 1, 2, and 3.</li> <li>2. Not required to be met when the 36 inch primary containment purge valves are open for pressure control, ALARA or air quality considerations for personnel entry. Also not required to be met during Surveillances or special testing on the purge system that requires the valves to be open. The 36 inch primary containment purge lines shall not be opened with a 12 inch primary containment purge line open nor with a drywell vent and purge supply or exhaust line open.</li> </ol> <p>-----</p> <p>Verify each 36 inch primary containment purge valve is closed.</p>	<p>31 days</p>

(continued)

3.6 CONTAINMENT SYSTEMS

3.6.4.1 Secondary Containment

LCO 3.6.4.1 The secondary containment shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,  
During movement of **recently** irradiated fuel assemblies in the  
primary or secondary containment,  
~~During CORE ALTERATIONS,~~  
During operations with a potential for draining the reactor  
vessel (OPDRVs).

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Secondary containment inoperable in MODE 1, 2, or 3.	A.1 Restore secondary containment to OPERABLE status.	4 hours
B. Required Action and associated Completion Time of Condition A not met.	B.1 Be in MODE 3.	12 hours
	<u>AND</u> B.2 Be in MODE 4.	36 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Secondary containment inoperable during movement of <b>recently</b> irradiated fuel assemblies in the primary or secondary containment, <del>during CORE ALTERATIONS</del> , or during OPDRVs.	C.1 -----NOTE----- LCO 3.0.3 is not applicable. -----  Suspend movement of <b>recently</b> irradiated fuel assemblies in the primary and secondary containment.	Immediately
	<del>C.2 Suspend CORE ALTERATIONS.</del>	<del>Immediately</del>
	C.2 Initiate action to suspend OPDRVs.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.6.4.1.1 Verify secondary containment vacuum is $\geq 0.25$ inch of vacuum water gauge.	24 hours
SR 3.6.4.1.2 Verify all secondary containment equipment hatches are closed and sealed.	31 days

(continued)

3.6 CONTAINMENT SYSTEMS

3.6.4.2 Secondary Containment Isolation Dampers (SCIDs)

LCO 3.6.4.2 Each SCID shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,  
During movement of **recently** irradiated fuel assemblies in the  
primary or secondary containment,  
~~During CORE ALTERATIONS,~~  
During operations with a potential for draining the reactor  
vessel (OPDRVs).

ACTIONS

-----NOTES-----

1. Penetration flow paths may be unisolated intermittently under administrative controls.
2. Separate Condition entry is allowed for each penetration flow path.
3. Enter applicable Conditions and Required Actions for systems made inoperable by SCIDs.

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(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>D. Required Action and associated Completion Time of Condition A or B not met during movement of <b>recently</b> irradiated fuel assemblies in the primary or secondary containment, <del>during CORE ALTERATIONS,</del> or during OPDRVs.</p>	<p>D.1 -----NOTE----- LCO 3.0.3 is not applicable. -----  Suspend movement of <b>recently</b> irradiated fuel assemblies in the primary and secondary containment.</p>	<p>Immediately</p>
	<p><u>AND</u>  <del>D.2 Suspend CORE ALTERATIONS.</del></p>	<p><del>Immediately</del></p>
	<p><u>AND</u>  D.2 Initiate action to suspend OPDRVs.</p>	<p>Immediately</p>

3.6 CONTAINMENT SYSTEMS

3.6.4.3 Standby Gas Treatment (SGT) System

LCO 3.6.4.3 Two SGT subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,  
During movement of **recently** irradiated fuel assemblies in the  
primary or secondary containment,  
~~During CORE ALTERATIONS,~~  
During operations with a potential for draining the reactor  
vessel (OPDRVs).

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One SGT subsystem inoperable.	A.1 Restore SGT subsystem to OPERABLE status.	7 days
B. Required Action and associated Completion Time of Condition A not met in MODE 1, 2, or 3.	B.1 Be in MODE 3.	12 hours
	<u>AND</u> B.2 Be in MODE 4.	36 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>C. Required Action and associated Completion Time of Condition A not met during movement of <b>recently</b> irradiated fuel assemblies in the primary or secondary containment, <del>during CORE ALTERATIONS</del>, or during OPDRVs.</p>	<p>-----NOTE----- LCO 3.0.3 is not applicable. -----</p>	
	<p>C.1 Place OPERABLE SGT subsystem in operation.</p>	<p>Immediately</p>
	<p><u>OR</u></p>	
	<p>C.2.1 Suspend movement of <b>recently</b> irradiated fuel assemblies in the primary and secondary containment.</p>	<p>Immediately</p>
	<p><u>AND</u></p>	
<p>D. Two SGT subsystems inoperable in MODE 1, 2, or 3.</p>	<p><del>C.2.2 Suspend CORE ALTERATIONS.</del></p>	<p><del>Immediately</del></p>
	<p><u>AND</u></p>	
	<p>C.2.2 Initiate action to suspend OPDRVs.</p>	<p>Immediately</p>
<p>D.1</p>	<p>Enter LCO 3.0.3.</p>	<p>Immediately</p>

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. Two SGT subsystems inoperable during movement of <b>recently</b> irradiated fuel assemblies in the primary or secondary containment, <del>during CORE ALTERATIONS</del> , or during OPDRVs.	E.1 Suspend movement of <b>recently</b> irradiated fuel assemblies in the primary and secondary containment.	Immediately
	<del>E.2 Suspend CORE ALTERATIONS.</del>	<del>Immediately</del>
	<u>AND</u>	
	E.2 Initiate action to suspend OPDRVs.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.6.4.3.1 Operate each SGT subsystem for $\geq 10$ continuous hours with heaters operating.	31 days
SR 3.6.4.3.2 Perform required SGT filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.6.4.3.3 Verify each SGT subsystem actuates on an actual or simulated initiation signal.	18 months
SR 3.6.4.3.4 Verify each SGT filter cooling bypass damper can be opened and the fan started.	18 months

BASES

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APPLICABLE	<u>2.g., 2.h and 2.i. Containment Building Fuel Transfer Pool</u>
SAFETY ANALYSES,	<u>Ventilation Plenum, Containment Building, and Containment</u>
LCO, and	<u>Building Continuous Containment Purge (CCP) Exhaust</u>
APPLICABILITY	<u>Radiation-High (continued)</u>

The Allowable Values are chosen to promptly detect gross failure of the fuel cladding and to ensure offsite doses remain below 10 CFR 20 and 10 CFR 100 limits.

These Functions are required to be OPERABLE during ~~CORE ALTERATIONS, OPDRVs,~~ OPDRVs and movement of **recently irradiated fuel assemblies (i.e., fuel that has occupied part of a critical reactor core within the previous 24 hours)** in the primary or secondary containment because the capability of detecting radiation releases due to fuel failures (due to fuel uncover or dropped fuel assemblies must be provided to ensure offsite dose limits are not exceeded.

2.j. Reactor Vessel Water Level-Low Low Low, Level 1

Low RPV water level indicates the capability to cool the fuel may be threatened. Should RPV water level decrease too far, fuel damage could result. Therefore, isolation of the primary containment occurs to prevent offsite dose limits from being exceeded. The Reactor Vessel Water Level-Low Low Low, Level 1 Function is one of the many Functions assumed to be OPERABLE and capable of providing isolation signals. The Reactor Vessel Water Level-Low Low Low, Level 1 Function associated with isolation is implicitly assumed in the USAR analysis as these leakage paths are assumed to be isolated post LOCA. In addition, this Function provides an isolation signal to certain drywell isolation valves. The isolation of drywell isolation

(continued)

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BASES

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APPLICABLE  
SAFETY ANALYSES,  
LCO, and  
APPLICABILITY

2.k. Containment Pressure-High (continued)

The Allowable Value was chosen to prevent opening of the containment ventilation supply and exhaust isolation bypass valves when excessive differential pressure could result in damage to the associated ductwork.

Two channels of the Containment Pressure-High Function are available and are required to be OPERABLE to ensure that no single instrument failure can preclude the isolation function.

2.1. Manual Initiation

The Manual Initiation push button channels introduce signals into the primary containment and drywell isolation logic that are redundant to the automatic protective instrumentation and provide manual isolation capability. There is no specific USAR safety analysis that takes credit for this Function. It is retained for the isolation function as required by the NRC in the plant licensing basis.

There are two push buttons for the logic, one manual initiation push button per trip system (i.e., 1B21H-S25A and 1B21H-S25B). There is no Allowable Value for this Function since the channels are mechanically actuated based solely on the position of the push buttons.

Two channels of the Manual Initiation Function are available and are required to be OPERABLE. This Function is also required to be OPERABLE during ~~core alterations~~, movement of **recently irradiated fuel assemblies (i.e., fuel that has occupied part of a critical reactor core within the previous 24 hours)** in primary or secondary containment, or OPDRVs. This Function initiates isolation of valves which isolate primary containment penetrations which bypass secondary containment. Thus, this Function is also required under those conditions in which secondary containment is required to be OPERABLE.

3. Reactor Core Isolation Cooling System Isolation

3.a. Auxiliary Building RCIC Steam Line Flow-High

Auxiliary Building RCIC Steam Line Flow-High Function is provided to detect a break of the RCIC steam lines and initiates closure of the steam line isolation valves. If the steam is allowed to continue flowing out of the break,

(continued)

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BASES

APPLICABLE  
SAFETY ANALYSES,  
LCO, and  
APPLICABILITY

4.f. Reactor Vessel Water Level-Low Low, Level 2  
(continued)

containment. Thus, this Function is also required under those conditions in which a low reactor water level signal could be generated when secondary containment is required to be OPERABLE.

4.g. SLC System Initiation

The isolation of the RWCU System is required when the SLC System has been initiated to prevent dilution and removal of the boron solution by the RWCU System (Ref. 4). SLC System initiation signals are initiated from the two SLC pump start signals.

There is no Allowable Value associated with this Function since the channels are mechanically actuated based solely on the position of the SLC System initiation switch.

Two channels (one from each pump) of SLC System Initiation Function are available and are required to be OPERABLE only in MODES 1 and 2, since these are the only MODES where the reactor can be critical, and these MODES are consistent with the Applicability for the SLC System (LCO 3.1.7).

4.h. Manual Initiation

The Manual Initiation push button channels introduce signals into the RWCU System isolation logic that are redundant to the automatic protective instrumentation and provide manual isolation capability. There is no specific USAR safety analysis that takes credit for this Function. It is retained for the isolation function as required by the NRC in plant licensing basis.

There are two push buttons for the logic, one manual initiation push button per trip system. There is no Allowable Value for this Function, since the channels are mechanically actuated based solely on the position of the push buttons.

Two channels of the Manual Initiation Function are available and are required to be OPERABLE. This Function is also required to be OPERABLE during ~~CORE ALTERATIONS~~, movement of

(continued)

BASES

APPLICABLE  
SAFETY ANALYSES,  
LCO, and  
APPLICABILITY

4.h. Manual Initiation (continued)

recently irradiated fuel assemblies (i.e., fuel that has occupied part of a critical reactor core within the previous 24 hours) in primary or secondary containment, or OPDRVs. This Function initiates isolation of valves which isolate primary containment penetrations which bypass secondary containment. Thus, this Function is also required under those conditions in which secondary containment is required to be operable.

5. RHR System Isolation

5.a. Ambient Temperature-High

Ambient Temperature-High is provided to detect a leak from the associated system steam piping. The isolation occurs when a very small leak has occurred and is diverse to the high flow instrumentation. If the small leak is allowed to continue without isolation, offsite dose limits may be reached. This Function is not assumed in any USAR transient or accident analysis, since bounding analyses are performed for large breaks such as MSLBs.

Ambient Temperature-High signals are initiated from thermocouples that are appropriately located to protect the system that is being monitored. Two instruments monitor each area. Four channels for RHR Ambient Temperature-High Function are available and are required to be OPERABLE to ensure that no single instrument failure can preclude the isolation function.

The Allowable Values are set low enough to detect a leak equivalent to 25 gpm.

The RHR Equipment Room Ambient Temperature-High Function is only required to be OPERABLE in MODES 1, 2, and 3. In MODES 4 and 5, insufficient pressure and temperature are available to develop a significant steam leak in this piping and significant water leakage is protected by the Reactor Vessel Water Level-Low, Level 3 Function.

5.b, 5.c. Reactor Vessel Water Level-Low, Level 3

Low RPV water level indicates the capability to cool the fuel may be threatened. Should RPV water level decrease too far, fuel damage could result. Therefore, isolation of some reactor or vessel interfaces occurs to begin isolating the

(continued)

## BASES

## ACTIONS

M.1, M.2, M.3.1, M.3.2, M.3.3, and M.3.4 (continued)

radioactivity releases. This may be performed as an administrative check, by examining logs or other information, to determine if the components are out of service for maintenance or other reasons. It is not necessary to perform the Surveillances needed to demonstrate the OPERABILITY of the components. If, however, any required component is inoperable, then it must be restored to OPERABLE status. In this case, the Surveillances may need to be performed to restore the component to OPERABLE status. In addition, at least one door in the upper containment personnel air lock must be closed. The closed air lock door completes the boundary for control of potential radioactive releases. With the appropriate administrative controls however, the closed door can be opened intermittently for entry and exit. This allowance is acceptable due to the need for containment access and due to the slow progression of events which may result from a reactor vessel draindown event. Reactor vessel draindown events would not be expected to result in the immediate release of appreciable fission products to the containment atmosphere. Actions must continue until all requirements of this Condition are satisfied.

N.1, N.2.1, N.2.2, ~~N.2.3~~, O.1, and O.2

If the channel is not restored to OPERABLE status or placed in trip within the allowed Completion Time, the associated penetration flow path(s) should be isolated (Required Action N.1 or O.1). Isolating the affected penetration flow path(s) accomplishes the safety function of the inoperable instrumentation. Alternately, the plant must be placed in a condition in which the LCO does not apply. If applicable, ~~CORE ALTERATIONS~~ and movement of **recently irradiated fuel assemblies (i.e., fuel that has occupied part of a critical reactor core within the previous 24 hours)** must be immediately suspended. Suspension of these activities shall not preclude completion of movement of a component to a safe condition. Also, if applicable, action must be immediately initiated to suspend OPDRVs to minimize the probability of a vessel draindown and subsequent potential for fission production release. Actions must continue until OPDRVs are suspended.

(continued)

## BASES

APPLICABLE  
SAFETY ANALYSES,  
LCO, and  
APPLICABILITY

3, 4, 5, 6. Containment Building Fuel Transfer Pool  
Ventilation Plenum, Containment Building, Containment  
Building Continuous Containment Purge (CCP), and Fuel  
Building Exhaust Radiation-High (continued)

detector is input to an individual monitor whose trip outputs are assigned to an isolation channel. Four channels of each of these Exhaust Radiation-High Functions are available and are required to be OPERABLE to ensure that no single instrument failure can preclude the isolation function.

The Allowable Values are chosen to promptly detect gross failure of the fuel cladding.

The Exhaust Radiation-High High Functions are required to be OPERABLE in MODES 1, 2, and 3 where considerable energy exists; thus, there is a probability of pipe breaks resulting in significant releases of radioactive steam and gas. In MODES 4 and 5, the probability and consequences of these events are low due to the RCS pressure and temperature limitations of these MODES; thus, these Functions are not required. In addition, the Functions are required to be OPERABLE during ~~CORE ALTERATIONS~~, OPDRVs, and movement of recently irradiated fuel assemblies (i.e., **fuel that has occupied part of a critical reactor core within the previous 24 hours**) in the primary containment or fuel building, as applicable, because the capability of detecting radiation releases due to fuel failures (due to fuel uncover or dropped fuel assemblies) must be provided to ensure that offsite dose limits are not exceeded.

#### 7. Manual Initiation

The Manual Initiation push button channels introduce signals into the secondary containment isolation logic that are redundant to the automatic protective instrumentation channels, and provide manual isolation capability. There is no specific USAR safety analysis that takes credit for this Function. It is retained for the secondary containment isolation instrumentation as required by the NRC approved licensing basis.

There are two push buttons for the logic, one manual initiation push button per trip system. There is no Allowable Value for this Function since the channels are mechanically actuated based solely on the position of the push buttons.

(continued)

## BASES

APPLICABLE  
SAFETY ANALYSES,  
LCO, and  
APPLICABILITY

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7. Manual Initiation (continued)

Two channels of the Manual Initiation Function are available and are required to be OPERABLE in MODES 1, 2, and 3 and during ~~CORE ALTERATIONS~~, OPDRVs, and movement of recently irradiated fuel assemblies (i.e., fuel that has occupied part of a critical reactor core within the previous 24 hours) in the primary containment or Fuel Building, since these are the MODES and other specified conditions in which the Secondary Containment Isolation automatic Functions are required to be OPERABLE.

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## ACTIONS

A Note has been provided to modify the ACTIONS related to secondary containment isolation instrumentation channels. Section 1.3, Completion Times, specifies that once a Condition has been entered, subsequent divisions, subsystems, components, or variables expressed in the Condition discovered to be inoperable or not within limits will not result in separate entry into the Condition. Section 1.3 also specifies that Required Actions of the Condition continue to apply for each additional failure, with Completion Times based on initial entry into the Condition. However, the Required Actions for inoperable secondary containment isolation instrumentation channels provide appropriate compensatory measures for separate inoperable channels. As such, a Note has been provided that allows separate Condition entry for each inoperable secondary containment isolation instrumentation channel.

A.1

Because of the diversity of sensors available to provide isolation signals and the redundancy of the isolation design, an allowable out of service time of 24 hours has been shown to be acceptable (Refs. 3 and 4) to permit restoration of any inoperable channel to OPERABLE status. This out of service time is only acceptable provided the associated Function is still maintaining isolation capability (refer to Required Action B.1 Bases). If the inoperable channel cannot be restored to OPERABLE status within the allowable out of service time, the channel must be placed in the tripped condition per Required Action A.1. Placing the inoperable channel in trip would conservatively compensate for the inoperability, restore capability to accommodate a single failure, and allow operation to continue. Alternately, if it is not desired to place the

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BASES

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LCO  
(continued)

The primary containment air locks are required to be OPERABLE. For each air lock to be considered OPERABLE, the air lock interlock mechanism must be OPERABLE, the air lock must be in compliance with the Type B air lock leakage test, and both air lock doors must be OPERABLE. The interlock allows only one air lock door to be open at a time. This provision ensures that a gross breach of primary containment does not exist when primary containment is required to be OPERABLE. Closure of a single door in each air lock is sufficient to provide a leak tight barrier following postulated events. Nevertheless, both doors are kept closed when the air lock is not being used for normal entry into and exit from primary containment.

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APPLICABILITY

In MODES 1, 2, and 3, a DBA could cause a release of radioactive material to primary containment. In MODES 4 and 5, the probability and consequences of these events are reduced due to the pressure and temperature limitations of these MODES. Therefore, maintaining OPERABLE primary containment air locks in MODE 4 or 5 to ensure a control volume is only required during situations for which significant releases of radioactive material can be postulated; such as during operations with a potential for draining the reactor vessel (OPDRVs), ~~during CORE ALTERATIONS~~, or during movement of **recently irradiated fuel assemblies (i.e., fuel that has occupied part of a critical reactor core within the previous 24 hours)** in the primary containment.

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ACTIONS

The ACTIONS are modified by Note 1, which allows entry and exit to perform repairs of the affected air lock component. If the outer door is inoperable, then it may be easily accessed for most repairs. It is preferred that the air lock be accessed from inside primary containment by entering through the other OPERABLE air lock. However, if this is not practicable, or if repairs on either door must be performed from the barrel side of the door, then it is permissible to enter the air lock through the OPERABLE door, which means there is a short time during which the primary containment boundary is not intact (during access through the OPERABLE door). The ability to open the OPERABLE door, even if it means the primary containment boundary is temporarily not intact, is acceptable due to the low probability of an event that could pressurize the primary containment during the short time in which the OPERABLE door is expected to be open. After each entry and exit, the OPERABLE door must be immediately closed.

(continued)

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BASES

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ACTIONS

C.1, C.2 and C.3 (continued)

both doors failing the seal test, the overall containment leakage rate can still be within limits.

Required Action C.2 requires that one door in the affected primary containment air locks must be verified closed. This Required Action must be completed within the 1 hour Completion Time. This specified time period is consistent with the ACTIONS of LCO 3.6.1.1, which require that primary containment be restored to OPERABLE status within 1 hour.

Additionally, the air lock must be restored to OPERABLE status within 24 hours. The 24 hour Completion Time is reasonable for restoring an inoperable air lock to OPERABLE status considering that at least one door is maintained closed in each affected air lock.

D.1 and D.2

If the inoperable primary containment air lock cannot be restored to OPERABLE status within the associated Completion Time while operating in MODE 1, 2, or 3, 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 12 hours and to MODE 4 within 36 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.

E.1, ~~E.2~~, and E.2

If the inoperable primary containment air lock cannot be restored to OPERABLE status within the associated Completion Time during OPDRVs, ~~during CORE ALTERATIONS~~, or during movement of **recently irradiated fuel assemblies (i.e., fuel that has occupied part of a critical reactor core within the previous 24 hours)** in the primary or secondary containment, action is required to immediately suspend activities that represent a potential for releasing radioactive material, thus placing the unit in a Condition that minimizes risk. If applicable, ~~CORE ALTERATIONS~~ and movement of **recently irradiated fuel assemblies** must be immediately suspended. Suspension of these activities shall not preclude completion of movement of a component to a safe

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BASES

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ACTIONS

E.1, ~~E.2~~, and E.2 (continued)

position. Also, if applicable, action must be immediately initiated to suspend OPDRVs to minimize the probability of a vessel draindown and subsequent potential for fission product release. Action must continue until OPDRVs are suspended.

The Required Actions of Condition E are modified by a Note indicating that LCO 3.0.3 does not apply. If moving **recently** irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, inability to suspend movement of **recently** irradiated fuel assemblies is not sufficient reason to require a reactor shutdown.

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SURVEILLANCE  
REQUIREMENTS

SR 3.6.1.2.1

Maintaining primary containment air locks OPERABLE requires compliance with the leakage rate test requirements of the Primary Containment Leakage Rate Testing Program when in MODES 1, 2, and 3. This SR reflects the leakage rate testing requirements with regard to air lock leakage (Type B leakage tests). The acceptance criteria were established during initial air lock and primary containment OPERABILITY testing. The periodic testing requirements verify that the air lock leakage does not exceed the allowed fraction of the overall primary containment leakage rate. The Frequency is required by the Primary Containment Leakage Rate Testing Program.

The SR has been modified by three Notes. Note 1 provides an exception to the specific leakage requirements for the primary containment air locks in other than MODES 1, 2, and 3. When not operating in MODES 1, 2, or 3, primary containment pressure is not expected to significantly increase above normal, and therefore specific testing at elevated pressure is not required. Note 2 states that an inoperable air lock door does not invalidate the previous successful performance of the overall air lock leakage test. This is considered reasonable since either air lock door is capable of providing a fission product barrier in the event of a DBA. Note 3 has been added to this SR, requiring the results to be evaluated against the acceptance criteria applicable to SR 3.6.1.1.1, i.e., the acceptance criteria

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BASES

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ACTIONS

E.1 and E.2 (continued)

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.

F.1, ~~G.1~~, G.1, and G.2

If any Required Action and associated Completion Time cannot be met, the plant must be placed in a condition in which the LCO does not apply. If applicable, ~~CORE ALTERATIONS~~ and movement of **recently** irradiated fuel assemblies (i.e., fuel that has occupied part of a critical reactor core within the previous 24 hours) in the primary and secondary containment must be immediately suspended. Suspension of these activities shall not preclude completion of movement of a component to a safe condition. Also, if applicable, action must be immediately initiated to suspend operations with a potential for draining the reactor vessel (OPDRVs) to minimize the probability of a vessel draindown and subsequent potential for fission product release. Actions must continue until OPDRVs are suspended. If suspending the OPDRVs would result in closing the residual heat removal (RHR) shutdown cooling isolation valves, an alternative Required Action is provided to immediately initiate action to restore the valves to OPERABLE status. This allows RHR to remain in service while actions are being taken to restore the valve.

The Required Actions of Condition F are modified by a Note indicating that LCO 3.0.3 does not apply. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, inability to suspend movement of **recently** irradiated fuel assemblies is not sufficient reason to require a reactor shutdown.

SURVEILLANCE  
REQUIREMENTS

SR 3.6.1.3.1

This SR verifies that the 36-inch primary containment purge valves are closed as required or, if open, open for an allowable reason. If a purge valve is open in violation of this SR, the valve is considered inoperable. If the inoperable valve is not otherwise known to have excessive leakage when closed, it is not considered to have leakage

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BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.6.1.3.1 (continued)

outside of the limits. If the open valve is known to have excessive leakage, Condition D applies.

The SR is also modified by a Note (Note 1) stating that primary containment purge valves are only required to be closed in MODES 1, 2, and 3. If a LOCA inside primary containment occurs in these MODES, the primary containment purge valves are capable of closing before the pressure pulse affects systems downstream of the purge valves and the release of radioactive material will not exceed limits prior to the purge valves closing. At times other than MODE 1, 2, or 3 when the purge valves are required to be capable of closing (e.g., during movement of **recently** irradiated fuel assemblies) pressurization concerns are not present and the purge valves are allowed to be open (automatic isolation

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BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.6.1.3.4 (continued)

in a time period less than or equal to that assumed in the safety analysis. The isolation time and Frequency of this SR are in accordance with the Inservice Testing Program.

With regard to isolation time values obtained pursuant to this SR, as read from plant indication instrumentation, the specified limit is considered to be a nominal value and therefore does not require compensation for instrument indication uncertainties (Ref. 8).

SR 3.6.1.3.5

For primary containment purge valves with resilient seals, additional leakage rate testing beyond the test requirements of the Primary Containment Leakage Rate Testing Program is required to ensure OPERABILITY. The acceptance criterion for this test is  $\leq 0.01 L_a$  when pressurized to Pa, 9.0 psig. Since cycling these valves may introduce additional seal degradation (beyond that which occurs to a valve that has not been opened), this SR must be performed within 92 days after opening the valve. However, operating experience has demonstrated that if a valve with a resilient seal is not stroked during an operating cycle, significant increased leakage through the valve is not observed. Based on this observation, a normal Frequency in accordance with the Primary Containment Leakage Rate Testing Program was established.

The SR is modified by a Note stating that the primary containment purge valves are only required to meet leakage rate testing requirements in MODES 1, 2, and 3. If a LOCA inside primary containment occurs in these MODES, purge valve leakage must be minimized to ensure offsite radiological release is within limits. At other times when the purge valves are required to be capable of closing (e.g., during handling of **recently** irradiated fuel), pressurization concerns are not present and the purge valves are not required to meet any specific leakage criteria.

With regard to leakage rate values obtained pursuant to this SR, as read from plant indication instrumentation, the specified limit is considered to be a nominal value and therefore does not require compensation for instrument indication uncertainties (Ref. 9).

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(continued)

BASES

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APPLICABLE SAFETY ANALYSES (continued)      Secondary containment satisfies Criterion 3 of the NRC Policy Statement.

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LCO      An OPERABLE secondary containment provides a control volume into which fission products that bypass or leak from primary containment, or are released from the reactor coolant pressure boundary components located in secondary containment, can be diluted and processed prior to release to the environment. For the secondary containment to be considered OPERABLE, it must have adequate leak tightness to ensure that the required vacuum can be established and maintained.

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APPLICABILITY      In MODES 1, 2, and 3, a LOCA could lead to a fission product release to primary containment that leaks to secondary containment. Therefore, secondary containment OPERABILITY is required during the same operating conditions that require primary containment OPERABILITY.

In MODES 4 and 5, the probability and consequences of the LOCA are reduced due to the pressure and temperature limitations in these MODES. Therefore, maintaining secondary containment OPERABLE is not required in MODE 4 or 5 to ensure a control volume, except for other situations for which significant releases of radioactive material can be postulated, such as during operations with a potential for draining the reactor vessel (OPDRVs), ~~during CORE ALTERATIONS,~~ or during movement of **recently irradiated fuel assemblies (i.e., fuel that has occupied part of a critical reactor core within the previous 24 hours)** in the primary or secondary containment.

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ACTIONS      A.1  
If secondary containment is inoperable, it must be restored to OPERABLE status within 4 hours. The 4 hour Completion Time provides a period of time to correct the problem that is commensurate with the importance of maintaining secondary

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BASES

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ACTIONS

A.1 (continued)

containment during MODES 1, 2, and 3. This time period also ensures that the probability of an accident (requiring secondary containment OPERABILITY) occurring during periods where secondary containment is inoperable is minimal.

B.1 and B.2

If the secondary containment cannot be restored to OPERABLE status within the required Completion Time, 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 12 hours and to MODE 4 within 36 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.

C.1, ~~C.2~~, and C.2

Movement of **recently** irradiated fuel assemblies in the primary or secondary containment, ~~CORE ALTERATIONS~~, and OPDRVs can be postulated to cause fission product release to the secondary containment. In such cases, the secondary containment is the only barrier to release of fission products to the environment. ~~CORE ALTERATIONS and~~ Movement of **recently** irradiated fuel assemblies must be immediately suspended if the secondary containment is inoperable.

Suspension of these activities shall not preclude completing an action that involves moving a component to a safe position. Also, action must be immediately initiated to suspend OPDRVs to minimize the probability of a vessel draindown and subsequent potential for fission product release. Actions must continue until OPDRVs are suspended.

Required Action C.1 has been modified by a Note stating that LCO 3.0.3 is not applicable. If moving **recently** irradiated fuel assemblies while in MODE 4 or 5, LCO 3.0.3 would not specify any action. If moving **recently** irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, in either case, inability to suspend

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BASES

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ACTIONS

C.1 and C.2 (continued)

movement of **recently** irradiated fuel assemblies would not be a sufficient reason to require a reactor shutdown.

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SURVEILLANCE  
REQUIREMENTS

SR 3.6.4.1.1

This SR ensures that the secondary containment boundary is sufficiently leak tight to preclude exfiltration under expected wind conditions. The 24 hour Frequency of this SR was developed based on operating experience related to secondary containment vacuum variations during the applicable MODES and the low probability of a DBA occurring between surveillances.

Furthermore, the 24 hour Frequency is considered adequate in view of other indications available in the control room, including alarms, to alert the operator to an abnormal secondary containment vacuum condition.

With regard to secondary containment vacuum values obtained pursuant to this SR, as read from plant indication instrumentation, the specified limit is considered to be a nominal value and therefore does not require compensation for instrument indication uncertainties (Ref. 3).

SR 3.6.4.1.2 and SR 3.6.4.1.3

Verifying that secondary containment equipment hatches and access doors are closed ensures that the infiltration of outside air of such a magnitude as to prevent maintaining the desired negative pressure does not occur. Verifying that all such openings are closed provides adequate assurance that exfiltration from the secondary containment will not occur. In this application the term "sealed" has no connotation of leak tightness. Maintaining secondary containment OPERABILITY requires verifying one door in the access opening is closed, except when the access opening is being used for entry and exit. The 31 day Frequency for these SRs has been shown to be adequate based on operating experience, and is considered adequate in view of the other controls on secondary containment access openings.

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BASES

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APPLICABLE  
SAFETY ANALYSES  
(continued)

the boundary established by SCIDs is required to ensure that leakage from the primary containment is processed by the Standby Gas Treatment (SGT) System before being released to the environment.

Maintaining SCIDs OPERABLE with isolation times within limits ensures that fission products will remain trapped inside secondary containment so that they can be treated by the SGT System prior to discharge to the environment.

SCIDs satisfy Criterion 3 of the NRC Policy Statement.

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LCO

SCIDs form a part of the secondary containment boundary. The SCID safety function is related to control of offsite radiation releases resulting from DBAs.

The power operated isolation dampers and valves are considered OPERABLE when their isolation times are within limits. Additionally, power operated automatic dampers and valves are required to actuate on an automatic isolation signal.

The normally closed isolation dampers, valves, or blind flanges are considered OPERABLE when manual dampers or valves are closed or open in accordance with appropriate administrative controls, automatic dampers are de-activated and secured in their closed position, or blind flanges are in place. The SCIDs covered by this LCO, along with their associated stroke times, if applicable, are listed in applicable plant procedures.

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APPLICABILITY

In MODES 1, 2, and 3, a DBA could lead to a fission product release to the primary containment that leaks to the secondary containment. Therefore, OPERABILITY of SCIDs is required.

In MODES 4 and 5, the probability and consequences of these events are reduced due to pressure and temperature limitations in these MODES. Therefore, maintaining SCIDs OPERABLE is not required in MODE 4 or 5, except for other situations under which significant releases of radioactive material can be postulated, such as during operations with a potential for draining the reactor vessel (OPDRVs), during

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BASES

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APPLICABILITY (continued)	<p><del>CORE ALTERATIONS</del>, or during movement of <b>recently</b> irradiated fuel assemblies (i.e., fuel that has occupied part of a <b>critical reactor core within the previous 24 hours</b>). Moving <b>recently</b> irradiated fuel assemblies in the secondary containment may also occur in MODES 1, 2, and 3.</p>
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ACTIONS	<p>The ACTIONS are modified by three Notes. The first Note allows penetration flow paths to be unisolated intermittently under administrative controls. These controls consist of stationing a dedicated individual, who is in continuous communication with the control room, at the controls of the isolation device. In this way, the penetration can be rapidly isolated when the need for secondary containment isolation is indicated.</p>
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The second Note provides clarification that for the purpose of this LCO separate Condition entry is allowed for each penetration flow path. This is acceptable, since the Required Actions for each Condition provide appropriate compensatory actions for each inoperable SCID. Complying with the Required Actions may allow for continued operation, and subsequent inoperable SCIDs are governed by subsequent Condition entry and application of associated Required Actions.

The third Note ensures appropriate remedial actions are taken, if necessary, if the affected system(s) are rendered inoperable by an inoperable SCID.

A.1 and A.2

In the event that there are one or more penetration flow paths with one SCID inoperable, the affected penetration flow path(s) must be isolated. The method of isolation must include the use of at least one isolation barrier that cannot be adversely affected by a single active failure. Isolation barriers that meet this criteria are a closed and de-activated automatic damper, a closed manual damper or valve, or a blind flange. For penetrations isolated in accordance with Required Action A.1, the device used to isolate the penetration should be the closest available device to secondary containment. This Required Action must be completed within the 8 hour Completion Time. The specified time period is reasonable considering the time required to isolate the penetration and the low probability of a DBA, which requires the SCIDs to close, occurring during this short time.

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BASES

ACTIONS

C.1 and C.2 (continued)

brought to at least MODE 3 within 12 hours and to MODE 4 within 36 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.

D.1, ~~D.2~~, and D.2

If any Required Action and associated Completion Time cannot be met, the plant must be placed in a condition in which the LCO does not apply. If applicable, ~~CORE ALTERATIONS and the~~ movement of **recently** irradiated fuel assemblies in the primary and secondary containment must be immediately suspended. Suspension of these activities shall not preclude completion of movement of a component to a safe position. Also, if applicable, action must be immediately initiated to suspend OPDRVs in order to minimize the probability of a vessel draindown and the subsequent potential for fission product release. Actions must continue until OPDRVs are suspended.

Required Action D.1 has been modified by a Note stating that LCO 3.0.3 is not applicable. If moving **recently** irradiated fuel assemblies while in MODE 4 or 5, LCO 3.0.3 would not specify any action. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, in either case, inability to suspend movement of **recently** irradiated fuel assemblies would not be a sufficient reason to require a reactor shutdown.

SURVEILLANCE  
REQUIREMENTS

SR 3.6.4.2.1

This SR verifies each secondary containment isolation manual valve, damper, and blind flange that is required to be closed during accident conditions is closed. The SR helps to ensure that post accident leakage of radioactive fluids or gases outside of the secondary containment boundary is within design limits. This SR does not require any testing or valve or damper manipulation. Rather, it involves verification that those SCIDs in secondary containment that are capable of being mispositioned are in the correct position.

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BASES

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APPLICABILITY  
(continued)

In MODES 4 and 5, the probability and consequences of these events are reduced due to the pressure and temperature limitations in these MODES. Therefore, maintaining the SGT System OPERABLE is not required in MODE 4 or 5, except for other situations under which significant releases of radioactive material can be postulated, such as during operations with a potential for draining the reactor vessel (OPDRVs), ~~during CORE ALTERATIONS~~, or during movement of **recently irradiated fuel assemblies (i.e., fuel that has occupied part of a critical reactor core within the previous 24 hours)** in the primary or secondary containment.

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ACTIONS

A.1

With one SGT subsystem inoperable, the inoperable subsystem must be restored to OPERABLE status within 7 days. In this Condition, the remaining OPERABLE SGT subsystem is adequate to perform the required radioactivity release control function. However, the overall system reliability is reduced because a single failure in the OPERABLE subsystem could result in the radioactivity release control function not being adequately performed. The 7 day Completion Time is based on consideration of such factors as the availability of the OPERABLE redundant SGT subsystem and the low probability of a DBA occurring during this period.

B.1 and B.2

If the SGT subsystem cannot be restored to OPERABLE status within the required Completion Time in MODE 1, 2, or 3, 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 12 hours and to MODE 4 within 36 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.

C.1, C.2.1, ~~C.2.2~~, and C.2.2

During movement of **recently irradiated fuel assemblies** in the primary or secondary containment, ~~during CORE ALTERATIONS~~, or during OPDRVs, when Required Action A.1 cannot be completed within the required Completion Time, the OPERABLE SGT subsystem should be immediately placed in operation. This Required Action ensures that the remaining subsystem is OPERABLE,

(continued)

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BASES

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ACTIONS

C.1, C.2.1, ~~C.2.2~~, and C.2.2 (continued)

that no failures that could prevent automatic actuation have occurred, and that any other failure would be readily detected.

An alternative to Required Action C.1 is to immediately suspend activities that represent a potential for releasing radioactive material to the secondary containment, thus placing the unit in a Condition that minimizes risk. If applicable, ~~CORE ALTERATIONS~~ and movement of **recently** irradiated fuel assemblies must be immediately suspended. Suspension of these activities shall not preclude completion of movement of a component to a safe position. Also, if applicable, action must be immediately initiated to suspend OPDRVs to minimize the probability of a vessel draindown and subsequent potential for fission product release. This action should be chosen if the OPDRVs could be impacted by a loss of offsite power. Action must continue until OPDRVs are suspended.

The Required Actions of Condition C have been modified by a Note stating that LCO 3.0.3 is not applicable. If moving **recently** irradiated fuel assemblies while in MODE 4 or 5, LCO 3.0.3 would not specify any action. If moving **recently** irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, in either case, inability to suspend movement of **recently** irradiated fuel assemblies would not be a sufficient reason to require a reactor shutdown.

D.1

If both SGT subsystems are inoperable in MODE 1, 2, or 3, the SGT System may not be capable of supporting the required radioactivity release control function. Therefore, LCO 3.0.3 must be entered immediately.

E.1 and E.2

When two SGT subsystems are inoperable, if applicable, CORE ALTERATIONS and movement of **recently** irradiated fuel assemblies in the primary and secondary containment must be immediately suspended. Suspension of these activities shall not preclude completion of movement of a component to a safe

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BASES

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ACTIONS

E.1 and E.2 (continued)

position. Also, if applicable, actions must be immediately initiated to suspend OPDRVs to minimize the probability of a vessel draindown and subsequent potential for fission product release. Action must continue until OPDRVs are suspended.

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SURVEILLANCE  
REQUIREMENTS

SR 3.6.4.3.1

Operating each SGT subsystem from the main control room for  $\geq 10$  continuous hours ensures that both subsystems are OPERABLE and that all associated controls are functioning properly. It also ensures that blockage, fan or motor failure, or excessive vibration can be detected for corrective action. Operation with the heaters on (automatic heater cycling to maintain temperature) for  $\geq 10$  continuous hours every 31 days eliminates moisture on the adsorbers and HEPA filters. The 31 day Frequency was developed in consideration of the known reliability of fan motors and controls and the redundancy available in the system.

With regard to operating time values obtained pursuant to this SR, as read from plant indication instrumentation, the specified limit is considered to be a nominal value and therefore does not require compensation for instrument indication uncertainties (Ref. 9).

SR 3.6.4.3.2

This SR verifies that the required SGT filter testing is performed in accordance with the Ventilation Filter Testing Program (VFTP). The VFTP includes testing HEPA filter performance, charcoal adsorber bypass leakage and efficiency, minimum system flow rate, combined HEPA filter and charcoal adsorber pressure drop, and heater dissipation. The frequencies for performing the SGT System filter tests are in accordance with Regulatory Guide 1.52 (Ref. 4) and include testing initially, after 720 hours of system operation, once per 18 months, and following painting, fire, or chemical release in any ventilation zone communicating with the system. The laboratory test results will be

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