

March 31, 1987

Docket No.: 50-416

Mr. Oliver D. Kingsley, Jr.
Vice President, Nuclear Operations
System Energy Resources, Inc.
Post Office Box 23054
Jackson, Mississippi 39205

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Dear Mr. Kingsley:

SUBJECT: TECHNICAL SPECIFICATION CHANGES TO DRYWELL AIRLOCK

RE: GRAND GULF NUCLEAR STATION, UNIT 1

The Commission has issued the enclosed Amendment No. 31 to Facility Operating License No. NPF-29 for the Grand Gulf Nuclear Station, Unit 1. This amendment consists of changes to the Technical Specifications (TSs) in response to your application, dated May 28, 1986, as amended November 11, 1986 and February 13, 1987.

This amendment changes the Technical Specifications (TSs) for the drywell airlock by: (1) changing the wording to indicate only one drywell airlock; (2) rearranging Action Statement "a" to clarify that all actions in the statement are parts of the same action; (3) changing the drywell overall airlock leakage test frequency from the present, once per six months, to each cold shutdown if not performed within the previous six months; (4) changing the surveillance requirement regarding the verification that only one door in the airlock can be opened at a time from once per six months to once per 18 months; and (5) changing the drywell airlock inflatable seal pressure instrumentation channel functional test from once per 31 days to once per 18 months.

A copy of our Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

/s/

Lester L. Kintner, Project Manager
BWR Project Directorate No. 4
Division of BWR Licensing

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PDR ADDCK 05000416
P PDR

Enclosures:

1. Amendment No. 31 to License No. NPF-29
2. Safety Evaluation

cc w/enclosures:

See next page

Previously concurred*:

PD#4/PM MO'Brien 3/17/87	PD#4/PM(CSN)* JUnda 03/19/87	PD#4/PM* LKintner 03/19/87
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*w/ noted concerns to notice
check STATE & SECY
before issuance*

OGC
Young
3/26/87

PD#4/D
WButler
3/30/87

WB



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555
March 31, 1987

Docket No.: 50-416

Mr. Oliver D. Kingsley, Jr.
Vice President, Nuclear Operations
System Energy Resources, Inc.
Post Office Box 23054
Jackson, Mississippi 39205

Dear Mr. Kingsley:

SUBJECT: TECHNICAL SPECIFICATION CHANGES TO DRYWELL AIRLOCK

RE: GRAND GULF NUCLEAR STATION, UNIT 1

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Sincerely,

A handwritten signature in cursive script that reads "L L Kintner".

Lester L. Kintner, Project Manager
BWR Project Directorate No. 4
Division of BWR Licensing

Enclosures:

1. Amendment No. 31 to License No. NPF-29
2. Safety Evaluation

cc w/enclosures:
See next page

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System Energy Resources, Inc.

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

MISSISSIPPI POWER & LIGHT COMPANY
SYSTEM ENERGY RESOURCES, INC.
SOUTH MISSISSIPPI ELECTRIC POWER ASSOCIATION
DOCKET NO. 50-416
GRAND GULF NUCLEAR STATION, UNIT 1
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 31
License No. NPF-29

1. The Nuclear Regulatory Commission (the Commission) has found that
 - A. The application for amendment by Mississippi Power & Light Company, System Energy Resources, Inc. (formerly Middle South Energy, Inc.) and South Mississippi Electric Power Association, (the licensees) dated May 28, 1986 as amended November 11, 1986 and February 13, 1987, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-29 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 31, are hereby incorporated into this license. System Energy Resources, Inc. shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

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P PDR

3. This license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/s/

Walter R. Butler, Director
BWR Project Directorate No. 4
Division of BWR Licensing

Attachment:
Changes to the Technical
Specifications

Date of Issuance: March 31, 1987

PD#4/PA
MO Brien
3/19/87

PD#4/PM (CSN)
JUnda
3/19/87

PD#4/PM
LKintner
3/19/87

OGC before issuance
M/Young 3/26/87
PD#4/D
WButler 3/13/87
WB

3. This license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Walter R. Butler

Walter R. Butler, Director
BWR Project Directorate No. 4
Division of BWR Licensing

Attachment:
Changes to the Technical
Specifications

Date of Issuance: March 31, 1987

ATTACHMENT TO LICENSE AMENDMENT NO. 31

FACILITY OPERATING LICENSE NO. NPF-29

DOCKET NO. 50-416

Replace the following pages of the Appendix "A" Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change. Overleaf page(s) provided to maintain document completeness.*

Remove

3/4 6-13
3/4 6-14

3/4 6-15
3/4 6-16

B 3/4 6-3
B 3/4 6-4

Insert

3/4 6-13
3/4 6-14*

3/4 6-15
3/4 6-16

B 3/4 6-3
B 3/4 6-4*

CONTAINMENT SYSTEMS

3/4.6.2 DRYWELL

DRYWELL INTEGRITY

LIMITING CONDITION FOR OPERATION

3.6.2.1 DRYWELL INTEGRITY shall be maintained.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2* and 3.

ACTION:

Without DRYWELL INTEGRITY, restore DRYWELL INTEGRITY within 1 hour or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

SURVEILLANCE REQUIREMENTS

4.6.2.1 DRYWELL INTEGRITY shall be demonstrated:

- a. At least once per 31 days by verifying that all drywell penetrations** not capable of being closed by OPERABLE drywell automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in position, except as provided in Table 3.6.4-1 of Specification 3.6.4.
- b. By verifying the drywell air lock is in compliance with the requirements of Specification 3.6.2.3.
- c. By verifying the suppression pool is in compliance with the requirements of Specification 3.6.3.1.

* See Special Test Exception 3.10.1.

** Except valves, blind flanges, and deactivated automatic valves which are located inside the drywell or containment and are locked, sealed or otherwise secured in the closed position. These penetrations shall be verified closed during each COLD SHUTDOWN except such verification need not be performed more often than once per 92 days.

CONTAINMENT SYSTEMS

DRYWELL BYPASS LEAKAGE

LIMITING CONDITION FOR OPERATION

3.6.2.2 Drywell bypass leakage shall be less than or equal to 10% of the acceptable A/\sqrt{k} design value of 0.90 ft².

APPLICABILITY: When DRYWELL INTEGRITY is required per Specification 3.6.2.1.

ACTION:

With the drywell bypass leakage greater than 10% of the acceptable A/\sqrt{k} design value of 0.90 ft², restore the drywell bypass leakage to within the limit prior to increasing reactor coolant system temperature above 200°F.

SURVEILLANCE REQUIREMENTS

4.6.2.2 The drywell bypass leakage rate test shall be conducted at least once per 18 months at an initial differential pressure of 3.0 psid and the A/\sqrt{k} shall be calculated from the measured leakage. One drywell airlock door shall remain open during the drywell leakage test such that each drywell door is leak tested during at least every other drywell leakage rate test.

- a. If any drywell bypass leakage rate test fails to meet the specified limit, the test schedule for subsequent tests shall be reviewed and approved by the Commission. If two consecutive tests fail to meet the limit, a test shall be performed at least once every 9 months until two consecutive tests meet the limit, at which time the above test schedule may be resumed.
- b. Air locks shall be tested and demonstrated OPERABLE per Surveillance Requirement 4.6.2.3.
- c. The provisions of Specification 4.0.2 are not applicable.

CONTAINMENT SYSTEMS

DRYWELL AIR LOCK

LIMITING CONDITION FOR OPERATION

3.6.2.3 The drywell air lock shall be OPERABLE with:

- a. Both doors closed except when the air lock is being used for normal transit entry and exit through the drywell, then at least one air lock door shall be closed, and
- b. An overall air lock leakage rate of less than or equal to 2 scf per hour at P_a , 11.5 psig.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2* and 3.

ACTION:

- a. With one drywell air lock door inoperable:
 - 1. Maintain at least the OPERABLE air lock door closed and either restore the inoperable air lock door to OPERABLE status within 24 hours or lock the OPERABLE air lock door closed. Operation may then continue provided that the OPERABLE air lock door is verified to be locked closed at least once per 31 days. Otherwise, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
 - 2. The provisions of Specification 3.0.4 are not applicable.
- b. With the drywell air lock inoperable, except as a result of an inoperable air lock door, maintain at least one air lock door closed; restore the inoperable air lock to OPERABLE status within 24 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
- c. With one drywell air lock door inflatable seal system seal pressure instrumentation channel inoperable, restore the inoperable channel to OPERABLE status within 7 days or verify the associated inflatable seal pressure to be ≥ 60 psig at least once per 12 hours.

*See Special Test Exception 3.10.1.

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS

4.6.2.3 The drywell air lock shall be demonstrated OPERABLE:

- a. Within 72 hours[#] after each closing, except when the air lock is being used for multiple entries, then at least once per 72 hours[#], by verifying seal leakage rate less than or equal to 2 scf per hour when the gap between the door seals is pressurized to P_a , 11.5 psig.
- b. By conducting an overall air lock leakage test at P_a , 11.5 psig and verifying that the overall air lock leakage rate is within its limit:
 1. Each COLD SHUTDOWN if not performed within the previous 6 months[#],
 2. Prior to establishing DRYWELL INTEGRITY when maintenance has been performed on the air lock that could affect the air lock sealing capability.
- c. At least once per 18 months by verifying that only one door in the air lock can be opened at a time.
- d. By verifying each airlock door inflatable seal system OPERABLE by:
 1. Demonstrating each of the two inflatable seal pressure instrumentation channels per airlock door OPERABLE by performance of a:
 - a) CHANNEL FUNCTIONAL TEST at least once per 18 months, and
 - b) CHANNEL CALIBRATION at least once per 18 months,with a low pressure setpoint of ≥ 60 psig.
 2. At least once per 7 days verifying seal air flask pressure to be greater than or equal to 90 psig.
 3. At least once per 18 months, conducting a seal pneumatic system leak test and verifying that system pressure does not decay more than 2 psig from 90 psig within 48 hours.

[#]The provisions of Specification 4.0.2 are not applicable.

CONTAINMENT SYSTEMS

BASES

CONTAINMENT PURGE SYSTEM (Continued)

Leakage integrity tests with a maximum allowable leakage rate for purge supply and exhaust isolation valves will provide early indication of resilient material seal degradation and will allow the opportunity for repair before gross leakage failures develop. The $0.60 L_a$ leaking limit shall not be exceeded when the leakage rates determined by the leakage integrity tests of these valves are added to the previously determined total for all valves and penetrations subject to Type B and C tests.

3/4.6.2 DRYWELL

3/4.6.2.1 DRYWELL INTEGRITY

Drywell integrity ensures that the steam released for the full spectrum of drywell pipe breaks is condensed inside the primary containment either by the suppression pool or by containment spray. By utilizing the suppression pool as a heat sink, energy released to the containment is minimized and the severity of the transient is reduced.

3/4.6.2.2 DRYWELL BYPASS LEAKAGE

The limitation on drywell bypass leakage rate ensures that the maximum leakage which could bypass the suppression pool during an accident would not result in the containment exceeding its design pressure of 15.0 psig. The design drywell leakage rate is expressed as A/\sqrt{k} and has a value of 0.90 ft². A/\sqrt{k} is dependent only on the geometry of drywell leakage paths where A = flow area of leakage paths in ft² and \sqrt{k} is a lumped constant which considers geometric and friction loss coefficients such as discontinuities and Reynolds number. At a 3 psid differential pressure from drywell to containment an A/\sqrt{k} of 0.90 ft² has an equivalent mass flow of 35,000 scfm. The integrated drywell leakage value is limited to 10% of the allowable drywell leakage capability, which is equivalent to 3500 scfm at 3 psid drywell to containment.

The A/\sqrt{k} value of 0.90 ft² is derived from the analysis of "bypass capability with containment spray and heat sinks" (FSAR 6.2.1.1.5.5). The limiting case accident is a very small reactor coolant system break which will not automatically result in a reactor depressurization. The long term differential pressure created between the drywell and containment will result in a significant pressure buildup in the containment due to this bypass leakage.

3/4.6.2.3 DRYWELL AIR LOCK

The limitations on closure for the drywell air lock are required to meet the restrictions on DRYWELL INTEGRITY and the drywell leakage rate given in Specifications 3.6.2.1 and 3.6.2.2. The specification makes allowances for the fact that there may be long periods of time when the air lock will be in a closed and secured position during reactor operation. Only one closed door in the air lock is required to maintain the integrity of the drywell.

Verification that each air lock door inflatable seal system is OPERABLE by the performance of a local leak-detection test for a period of less than 48 hours is permissible if it can be demonstrated that the leakage rate can be accurately determined for this shorter period. This is in accordance with Sections 6.4 and 7.6 of ANSI N45.4-1972.

CONTAINMENT SYSTEMS

BASES

3/4.6.2.4 DRYWELL STRUCTURAL INTEGRITY

This limitation ensures that the structural integrity of the drywell will be maintained comparable to the original design specification for the life of the unit. A visual inspection in conjunction with Type A leakage tests is sufficient to demonstrate this capability.

3/4.6.2.5 DRYWELL INTERNAL PRESSURE

The limitations on drywell-to-containment differential pressure ensure that the drywell peak pressure of 22.0 psig does not exceed the design pressure of 30.0 psig and that the containment peak pressure of 11.5 psig does not exceed the design pressure of 15.0 psig during LOCA conditions. The maximum external drywell pressure differential is limited to +0.26 psid, well below the 2.3 psid at which suppression pool water will be forced over the weir wall and into the drywell. The limit of 2.0 psid for initial positive drywell to containment pressure will not allow clearing of the top vent which is consistent with the safety analysis.

3/4.6.2.6 DRYWELL AVERAGE AIR TEMPERATURE

The limitation on drywell average air temperature ensures that peak drywell temperature does not exceed the design temperature of 330°F during LOCA conditions and is consistent with the safety analysis.

3/4.6.2.7 DRYWELL VENT AND PURGE

The drywell vent and purge system must be normally maintained closed to eliminate a potential challenge to containment structural integrity due to a steam bypass of the suppression pool. Intermittent venting of the drywell is allowed for pressure control during OPERATIONAL CONDITIONS 1 and 2, but the cumulative time of venting is limited to 5 hours per year. Venting of the drywell is prohibited when either a 6-inch containment supply or exhaust valve or a 20-inch containment purge supply or exhaust valve is open, thus eliminating any resultant direct leakage path from the drywell to the environment.

Intermittent drywell venting and use of the drywell purge mode of the containment cooling system is allowed during OPERATIONAL CONDITION 3 to reduce the drywell airborne activity levels prior to and during personnel entry periods and to control drywell pressure, but is limited to 90 hours of use per 365 days.

3/4.6.3 DEPRESSURIZATION SYSTEMS

The specifications of this section ensure that the drywell and containment pressure will not exceed the design pressure of 30 psig and 15 psig, respectively, during primary system blowdown from full operating pressure.

The suppression pool water volume must absorb the associated decay and structural sensible heat released during a reactor blowdown from 1060 psia. Using conservative parameter inputs, the maximum calculated containment pressure during and following a design basis accident is below the containment design pressure of 15 psig. Similarly the drywell pressure remains below the



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 31 TO FACILITY OPERATING LICENSE NO. NPF-29

MISSISSIPPI POWER & LIGHT COMPANY

SYSTEM ENERGY RESOURCES, INC.

SOUTH MISSISSIPPI ELECTRIC POWER ASSOCIATION

GRAND GULF NUCLEAR STATION, UNIT 1

DOCKET NO. 50-416

1.0 INTRODUCTION

By letter dated May 28, 1986 as amended November 11, 1986 and February 13, 1987, Mississippi Power & Light Company, (the licensee)* requested an amendment to Facility Operating License No. NPF-29 for the Grand Gulf Nuclear Station, Unit 1. The proposed amendment would: (1) change the wording to indicate only one drywell airlock; (2) rearrange Action Statement "a" to clarify that all actions in the statement are parts of the same action; (3) change the drywell overall airlock leakage test frequency from the present, once per six months, to each cold shutdown if not performed within the previous six months; (4) change the surveillance requirement regarding the verification that only one door in the airlock can be opened at a time from once per six months to once per 18 months; and (5) change the drywell air lock inflatable seal pressure instrumentation channel functional test from once per 31 days to once per 18 months.

2.0 EVALUATION

Proposed change (1) involves the clarification of the wording in the Limiting Conditions for Operation, Surveillance Requirements and Bases of TS 3/4.6.2, "Drywell Integrity". Since the drywell contains only one personnel airlock, the present TS wording, which indicates more than one airlock, does not accurately describe the as-built equipment. The proposed change is, therefore, acceptable.

Proposed change (2) (combination of parts 1, 2, and 3 of TS 3.6.2.3 Action Statement a. into one statement) is proposed to eliminate the possibility of misinterpreting the current TSs as three independent actions, whereas, they are intended to be three parts of the same action statement. The

*On December 20, 1986, the Commission issued License Amendment No. 27 which authorized the transfer of control and performance of licensed activities from Mississippi Power & Light Company to System Energy Resources, Inc. (SERI). "The licensee" refers to Mississippi Power & Light Company before December 20, 1986 and to SERI on or after December 20, 1986.

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change would make the Grand Gulf TSs consistent with the TSs of other BWR plants. Proposed change (2) does not modify the actual action requirements and, therefore, is acceptable.

Proposed change (3) (decreasing the frequency of airlock leakage tests required by TS 4.6.2.3.b.1) would allow airlock leakage tests to be performed each cold shutdown, if not performed within the previous six months. As presently written, this test may be required when the plant is at power and, consequently, would require work in a high radiation area. This test is needed to ensure that the maximum leakage which could bypass the suppression pool during an accident would not result in the containment exceeding the design pressure of 15.0 psig. The drywell airlock is one of the potential bypass leakage paths. The six-month surveillance requirement has been traditionally associated with primary containment to which Appendix J applies. The drywell of Mark III plants is not primary containment. There are other independent means for assuring airlock operability. Surveillance Requirement 4.6.2.3.d requires the airlock door inflatable seal system to be operable. Surveillance Requirement 4.6.2.3.c assures that only one door in the airlock can be opened at a time. Only one closed door in the airlock is required to maintain the integrity of the drywell. Surveillance Requirement 4.6.2.3.a assures door seals are secured after each opening. Furthermore, by allowing the airlock leakage test during cold shutdown, personnel exposures in a high radiation area are minimized. This proposed change would also make the Grand Gulf TSs consistent with the TSs of other BWR-6 plants. For the reasons cited above, the proposed change is acceptable.

Proposed change (4) would extend the surveillance interval in Surveillance Requirement 4.6.2.3.c from six months to 18 months. This surveillance requirement deals with the verification that only one door in the drywell airlock can be opened at a time so that integrity of the drywell is assured while the plant is in operation. During operation above 5% power, drywell entry is not allowed by an administrative procedure. This makes the frequency of personnel entry into the drywell extremely small when at power. Every 18 months, the licensee will assure that the airlock doors are properly operating as required by the proposed TS change. Therefore, the requested change is acceptable. Other BWR-6 plants have a similar requirement.

Proposed change (5) would increase the surveillance interval in Surveillance Requirement 4.6.2.3.d.1.(a) from the current 31 days to 18 months for the inflatable seal pressure instrumentation channel functional test. Inflatable seals are on each airlock door to ensure a leak tightness of the doors. The purpose of the inflatable seal pressure instrumentation is to provide a signal to local indicating lights and also provide a permissive for the hydraulic door operating system. These lights provide personnel entering one door of the airlock with an indication that the other door is properly sealed. A mechanical interlock exists which prevents the opening of both doors simultaneously. The drywell airlock

inflatable seal pressure instrumentation activates no control room status lights or alarms and, thus, serves no function in warning of drywell integrity violation in the control room. There are other means to verify seal integrity and mechanical interlock. TS 4.6.2.3.d verifies seal air flask pressure once per seven days, and provides for a seal leakage test once per 18 months. Airlock door Surveillance Requirement 4.6.2.3.c ensures that only one door in the airlock can be opened at a time. During plant operation above 5% power, drywell entry is not allowed by procedure and therefore the inflatable seal pressure instrumentation is not needed for a personnel entry. This proposed change has also been implemented at other operating BWR-6's with similar instrumentation arrangements. For the reasons cited above, the requested change is acceptable.

3.0 ENVIRONMENTAL CONSIDERATION

This amendment involves a change to a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes to the surveillance requirements. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

4.0 CONCLUSION

The Commission made a proposed determination that the amendment involves no significant hazards consideration which was published in the Federal Register (52 FR 5861) on February 26, 1987, and consulted with the state of Mississippi. No public comments were received, and the state of Mississippi did not have any comments.

The staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and the security nor to the health and safety of the public.

Principal Contributor:
Sang Bo Kim, Plant Systems Branch, DBL

Dated: March 31, 1987