

Table 3.3.7-1 (page 1 of 1)  
CREVS Actuation Instrumentation

FUNCTION	REQUIRED CHANNELS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Manual Initiation	2 trains	SR 3373	NA
2. Control Room Radiation Control Room Air Intakes	2	SR 3371 SR 3372 SR 3374	$\leq 9.45E-05 \mu\text{Ci/cc}$ (3,308 cpm)
3. Safety Injection	Refer to LCO 332, "ESFAS Instrumentation," Function 1, for all initiation functions and requirements		

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.16 RCS Specific Activity

LCO 3.4.16 The specific activity of the reactor coolant shall be within limits.

APPLICABILITY: MODES 1 and 2,  
MODE 3 with RCS average temperature ( $T_{avg}$ )  $\geq$  500°F.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. DOSE EQUIVALENT I-131 > 0.265 $\mu$ Ci/gm.	-----NOTE----- LCO 3.0.4 is not applicable. -----	
	A.1 Verify DOSE EQUIVALENT I-131 $\leq$ 21 $\mu$ Ci/gm  <u>AND</u> A.2 Restore DOSE EQUIVALENT I-131 to within limit.	Once per 4 hours     48 hours
B. Gross specific activity of the reactor coolant not within limit.	B.1 Perform SR 3.4.16.2.  <u>AND</u>	4 hours
	B.2 Be in MODE 3 with $T_{avg}$ < 500°F.	6 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Required Action and associated Completion Time of Condition A not met.  <u>OR</u>  DOSE EQUIVALENT I-131 > 21 $\mu\text{Ci/gm}$ .	C.1 Be in MODE 3 with $T_{\text{avg}} < 500^\circ\text{F}$ .	6 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.4.16.1 Verify reactor coolant gross specific activity $\leq 100/\bar{E}$ $\mu\text{Ci/gm}$ .	7 days
SR 3.4.16.2 -----NOTE----- Only required to be performed in MODE 1. -----  Verify reactor coolant DOSE EQUIVALENT I-131 specific activity $\leq 0.265 \mu\text{Ci/gm}$ .	14 days  <u>AND</u>  Between 2 and 6 hours after a THERMAL POWER change of $\geq 15\%$ RTP within a 1 hour period

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FIGURE 3.4.16-1

B 3.4 REACTOR COOLANT SYSTEM (RCS)

B 3.4.16 RCS Specific Activity

BASES

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BACKGROUND

The maximum dose to the whole body and the thyroid that an individual at the site boundary can receive for 2 hours during an accident is specified in 10 CFR 100 (Ref. 1). The maximum dose to the whole body and the thyroid that an individual occupying the Main Control Room can receive for the accident duration is specified in 10 CFR 50, Appendix A, GDC 19. The limits on specific activity ensure that the doses are held to a small fraction of the 10 CFR 100 limits and within the 10 CFR 50, Appendix A, GDC 19 limits during analyzed transients and accidents.

The RCS specific activity LCO limits the allowable concentration level of radionuclides in the reactor coolant. The LCO limits are established to minimize the offsite and Main Control Room radioactivity dose consequences in the event of a steam generator tube rupture (SGTR) or main steam line break (MSLB) accident.

The LCO contains specific activity limits for both DOSE EQUIVALENT I-131 and gross specific activity. The allowable levels are intended to limit the 2 hour dose at the site boundary to a small fraction of the 10 CFR 100 dose guideline limits, and ensure the Main Control Room accident dose is within the appropriate 10 CFR 50, Appendix A, GDC 19 dose guideline limits.

The evaluations showed the potential offsite and Main Control Room dose levels for a SGTR and MSLB accident were within the appropriate 10 CFR 100 and GDC 19 guideline limits.

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APPLICABLE  
SAFETY ANALYSES

The LCO limits on the specific activity of the reactor coolant ensures that the resulting 2 hour doses at the site boundary and Main Control Room accident doses will not exceed the appropriate 10 CFR 100 dose guideline limits and 10 CFR 50, Appendix A, GDC 19 dose guideline limits following a SGTR or MSLB accident. The SGTR and MSLB safety analysis (Ref. 2) assume the specific activity of the reactor coolant at the LCO limit and an existing reactor coolant steam generator (SG) tube leakage rate of 150 gallons per day (GPD). The safety analysis assumes the specific activity of the secondary coolant at its limit of 0.1  $\mu\text{Ci/gm}$  DOSE EQUIVALENT I-131 from LCO 3.7.14, "Secondary Specific Activity."

(continued)

BASES

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APPLICABLE  
SAFETY ANALYSES  
(continued)

The analysis for the SGTR and MSLB accidents establish the acceptance limits for RCS specific activity. Reference to these analyses is used to assess changes to the unit that could affect RCS specific activity, as they relate to the acceptance limits.

The analyses are for two cases of reactor coolant specific activity. One case assumes specific activity at 0.265  $\mu\text{Ci/gm}$  DOSE EQUIVALENT I-131 with an iodine spike immediately after the accident that increases the iodine activity in the reactor coolant by a factor of 500 times the iodine production rate necessary to maintain a steady state iodine concentration of 0.265  $\mu\text{Ci/gm}$  DOSE EQUIVALENT I-131. The second case assumes the initial reactor coolant iodine activity at 21  $\mu\text{Ci/gm}$  DOSE EQUIVALENT I-131 due to a pre-accident iodine spike caused by an RCS transient. In both cases, the noble gas activity in the reactor coolant equals the LCO limit of  $100/\bar{E}$   $\mu\text{Ci/gm}$  for gross specific activity.

The analysis also assumes a loss of offsite power at the same time as the SGTR and MSLB event. The SGTR causes a reduction in reactor coolant inventory. The reduction initiates a reactor trip from a low pressurizer pressure signal or an RCS overtemperature  $\Delta T$  signal. The MSLB results in a reactor trip due to low steam pressure.

The coincident loss of offsite power causes the steam dump valves to close to protect the condenser. The rise in pressure in the ruptured SG discharges radioactively contaminated steam to the atmosphere through the SG power operated relief valves and the main steam safety valves. The unaffected SGs remove core decay heat by venting steam to the atmosphere until the cooldown ends.

The safety analysis shows the radiological consequences of a SGTR and MSLB accident are within the appropriate 10 CFR 100 and 10 CFR 50, Appendix A, GDC 19 dose guideline limits. Operation with iodine specific activity levels greater than the LCO limit is permissible, if the activity levels do not exceed 21  $\mu\text{Ci/gm}$  DOSE EQUIVALENT I-131, in the applicable specification, for more than 48 hours. The safety analysis has concurrent and pre-accident iodine spiking levels up to 21  $\mu\text{Ci/gm}$  DOSE EQUIVALENT I-131.

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BASES

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APPLICABLE  
SAFETY ANALYSES  
(continued)

The limits on RCS specific activity are also used for establishing standardization in radiation shielding and plant personnel radiation protection practices.

RCS specific activity satisfies Criterion 2 of the NRC Policy Statement.

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LCO

The specific iodine activity is limited to 0.265  $\mu\text{Ci/gm}$  DOSE EQUIVALENT I-131, and the gross specific activity in the reactor coolant is limited to the number of  $\mu\text{Ci/gm}$  equal to 100 divided by  $100/\bar{E}$  (average disintegration energy of the sum of the average beta and gamma energies of the coolant nuclides). The limit on DOSE EQUIVALENT I-131 ensures the 2 hour thyroid dose to an individual at the site boundary and accident dose to personnel in the Main Control Room during the Design Basis Accident (DBA) will be within the allowed thyroid dose. The limit on gross specific activity ensures the 2 hour whole body dose to an individual at the site boundary and accident dose to personnel in the Main Control Room during the DBA will be within the allowed whole body dose.

The SGTR and MSLB accident analysis (Ref. 2) shows that the 2 hour site boundary dose levels and Main Control Room accident dose are within acceptable limits. Violation of the LCO may result in reactor coolant radioactivity levels that could, in the event of a SGTR or MSLB, lead to site boundary doses that exceed the 10 CFR 100 dose guideline limits, or Main control Room accident dose that exceed the 10 CFR 50, Appendix A, GDC 19 dose limits.

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APPLICABILITY

In MODES 1 and 2, and in MODE 3 with RCS average temperature  $\geq 500^\circ\text{F}$ , operation within the LCO limits for DOSE EQUIVALENT I-131 and gross specific activity are necessary to contain the potential consequences of an accident to within the acceptable Main Control Room and site boundary dose values.

For operation in MODE 3 with RCS average temperature  $< 500^\circ\text{F}$ , and in MODES 4 and 5, the release of radioactivity in the event of a SGTR is unlikely since the saturation pressure of the reactor coolant is below the lift pressure settings of the main steam safety valves.

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(continued)

BASES (continued)

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ACTIONS

A.1 and A.2

With the DOSE EQUIVALENT I-131 greater than the LCO limit, samples at intervals of 4 hours must be taken to demonstrate that the limit of 21  $\mu\text{Ci/gm}$  is not exceeded. The Completion Time of 4 hours is required to obtain and analyze a sample. Sampling is done to continue to provide a trend.

The DOSE EQUIVALENT I-131 must be restored to within limits within 48 hours. The Completion Time of 48 hours is required, if the limit violation resulted from normal iodine spiking.

A Note to the ACTIONS excludes the MODE change restriction of LCO 3.0.4. This exception allows entry into the applicable MODE(s) while relying on the ACTIONS even though the ACTIONS may eventually require plant shutdown. This exception is acceptable due to the significant conservatism incorporated into the specific activity limit, the low probability of an event which is limiting due to exceeding this limit, and the ability to restore transient specific activity excursions while the plant remains at, or proceeds to power operation.

B.1 and B.2

With the gross specific activity in excess of the allowed limit, an analysis must be performed within 4 hours to determine DOSE EQUIVALENT I-131. The Completion Time of 4 hours is required to obtain and analyze a sample.

The change within 6 hours to MODE 3 and RCS average temperature  $< 500^{\circ}\text{F}$  lowers the saturation pressure of the reactor coolant below the setpoints of the main steam safety valves and prevents venting the SG to the environment in an SGTR event. The allowed Completion Time of 6 hours is reasonable, based on operating experience, to reach MODE 3 below  $500^{\circ}\text{F}$  from full power conditions in an orderly manner and without challenging plant systems.

(continued)

BASES

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ACTIONS  
(continued)

C.1

If a Required Action and the associated Completion Time of Condition A is not met or if the DOSE EQUIVALENT I-131 is greater than 21  $\mu\text{Ci/gm}$ , the reactor must be brought to MODE 3 with RCS average temperature < 500°F within 6 hours. The Completion Time of 6 hours is reasonable, based on operating experience, to reach MODE 3 below 500°F from full power conditions in an orderly manner and without challenging plant systems.

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SURVEILLANCE  
REQUIREMENTS

SR 3.4.16.1

SR 3.4.16.1 requires performing a gamma isotopic analysis as a measure of the gross specific activity of the reactor coolant at least once every 7 days. While basically a quantitative measure of radionuclides with half lives longer than 15 minutes, excluding iodines, this measurement is the sum of the degassed gamma activities and the gaseous gamma activities in the sample taken. This Surveillance provides an indication of any increase in gross specific activity.

Trending the results of this Surveillance allows proper remedial action to be taken before reaching the LCO limit under normal operating conditions. The Surveillance is applicable in MODES 1 and 2, and in MODE 3 with  $T_{\text{avg}}$  at least 500°F. The 7 day Frequency considers the unlikelihood of a gross fuel failure during the time.

SR 3.4.16.2

This Surveillance is performed in MODE 1 only to ensure iodine remains within limit during normal operation and following rapid power changes when fuel failure is more apt to occur. The 14 day Frequency is adequate to trend changes in the iodine activity level, considering gross activity is monitored every 7 days. The Frequency, between 2 and 6 hours after a power change  $\geq 15\%$  RTP within a 1 hour period, is established because the iodine levels peak during this time following fuel failure; samples at other times would provide inaccurate results.

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