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December 2, 2002

Docket Nos. 50-321  
50-366

HL-6322

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

Edwin I. Hatch Nuclear Plant  
Technical Specifications Revision to  
Secondary Containment Access Door Surveillance

Ladies and Gentlemen:

In accordance with the provisions of 10 CFR 50.90 (c)(1), Southern Nuclear Operating Company (SNC) hereby proposes a change to the Plant Hatch Units 1 and 2 Technical Specifications, Appendix A to operating licenses DPR-57 and NPF-5, respectively. This submittal proposes to change surveillance requirement (SR) 3.6.4.1.2 to require that only one access door in each opening of the secondary containment be closed. This change is consistent with Technical Specification Task Force (TSTF) change traveler TSTF-18, Revision 1. It is also consistent with the current version of the BWR/4 Standard Technical Specifications, NUREG 1433.

Enclosure 1 provides a description and justification for the proposed change. Enclosure 2 provides the no significant hazards evaluation as well as the environmental evaluation. Finally, enclosure 3 contains the published and marked up Technical Specifications and Bases pages as well as the page change instructions.

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

Respectfully submitted,

H. L. Sumner, Jr.

Sworn to and subscribed before me this 2<sup>ND</sup> day of December 2002.

Jan C. Edge  
Notary Public

Commission Expiration Date: 7/27/05

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U.S. Nuclear Regulatory Commission

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Enclosures:

1. Description of and Justification for Technical Specifications Change
2. No Significant Hazards Evaluation and the Environmental Evaluation
3. Page Change Instructions, Published and Marked-up Pages

OCV/eb

cc: Southern Nuclear Operating Company  
Mr. P. H. Wells, Nuclear Plant General Manager  
SNC Document Management (R-Type A02.001)

U.S. Nuclear Regulatory Commission, Washington, D.C.  
Mr. Joseph Colaccino, Project Manager - Hatch

U.S. Nuclear Regulatory Commission, Region II  
Mr. L. A. Reyes, Regional Administrator  
Mr. J. T. Munday, Senior Resident Inspector - Hatch

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

## Enclosure 1

### Edwin I. Hatch Nuclear Plant Technical Specifications Revision to Secondary Containment Access Door Surveillance

#### Description of and Justification for Technical Specifications Change

This proposed Technical Specifications (TS) amendment revises the acceptance criteria for Unit 1 and 2 TS Surveillance Requirement (SR) 3.6.4.1.2 to require that only one access door in each access opening in the secondary containment be closed. Currently, both doors are required to be closed to comply with the SR. The proposed change is consistent with industry Technical Specification Task Force (TSTF) Standard Technical Specification Change traveler TSTF-18, revision 1. It is also consistent with the current version of the Standard Technical Specifications for BWR/4 plants, NUREG 1433, Volume 1, Rev.2, June 2001.

SR 3.6.4.1.2 currently requires that both secondary containment access doors be closed, "except when the access opening is being used for entry and exit, then at least one door shall be closed." This requirement is unnecessarily and unreasonably restrictive. When one of the two doors cannot be closed, the plant cannot comply with the requirements of the SR. Per SR 3.0.1, failure to comply with the requirements of a surveillance requirement "shall be failure to meet the LCO." By the requirements of SR 3.6.4.1.2 and SR 3.0.1, therefore, the secondary containment must be declared inoperable whenever a secondary containment access door cannot be closed. This is unnecessary when the other secondary containment access door is closed, providing the required barrier and maintaining secondary containment integrity. This allowance would permit maintenance to be performed on one door so long as the other door remains closed.

Verifying one of the two access doors closed is sufficient to ensure that the infiltration of outside air does not prevent the establishment and preservation of the required negative pressure within the secondary containment. Neither the requirements regarding minimum negative pressure, maximum infiltration and drawdown time, nor the actions required to be taken should these requirements not be met will be altered by the proposed license amendment.

Enclosure 2

Edwin I. Hatch Nuclear Plant  
Technical Specifications Revision to  
Secondary Containment Access Door Surveillance

No Significant Hazards Evaluation  
and  
Environmental Evaluation

In 10CFR50.92(c), the NRC provides the following standards to be used in determining the existence of a significant hazards consideration:

*... a proposed amendment to an operating license for a facility licensed under §50.21(b) or §50.22 or for a testing facility involves no significant hazards consideration, if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.*

Southern Nuclear Operating Company (SNC) has reviewed the proposed Licensing amendment and has concluded that the change does not involve a significant hazards consideration because: (1) the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated, (2) the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated, and (3) the proposed change does not involve a significant reduction in the margin of safety. The basis for this conclusion follows:

**Basis for No Significant Hazards Consideration Determination**

1. *The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.*

The proposed change to Surveillance Requirement SR 3.6.4.1.2 would require that only one of the two secondary containment access doors be verified closed; presently, both doors are required to be verified closed. This change is administrative in nature in that it does not involve, require, or result from any physical change to the secondary containment boundary or access door configuration. The change to Surveillance Requirement SR 3.6.4.1.2 is consistent with TSTF Standard Technical Specification Change Traveler TSTF-18, Revision 1, and Surveillance Requirement SR 3.6.4.1.3 of Revision 2 of Volume 1 of NUREG-1433. As indicated in the "Justification" portion of Standard Technical Specification Change Traveler TSTF-18, Revision 1, verifying one of the two access doors is closed is sufficient to ensure that the infiltration of outside air does not prevent the establishment and preservation of the required negative pressure within the secondary containment. Indeed, neither the requirements regarding minimum negative pressure and maximum infiltration and drawdown time nor the actions required to be taken should these requirements not be met will be altered by the proposed Licensing amendment.

No Significant Hazards Evaluation and the Environmental Evaluation

Because the physical characteristics and performance requirements of the secondary containment will not be altered and the change to Surveillance Requirement SR 3.6.4.1.2 is consistent with the current revision of NUREG-1433, the proposed Licensing amendment can not involve a significant increase in the probability or consequences of any accident previously evaluated.

2. *The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.*

For the reasons previously discussed, neither the secondary containment boundary nor the access door configuration will be altered by or because of the proposed change to the surveillance requirement. Likewise, the requirements defining and governing secondary containment operability and functionality, that is, Standby Gas Treatment system flow rate and secondary containment negative pressure and drawdown limits, will not be changed. The secondary containment, including its access openings, will remain physically unaltered; will function as presently described in the Updated Final Safety Analysis Report; and will be subject to the same structural and functional requirements. Under these circumstances, this change can not, and does not, create the possibility of a new or different kind of accident from any previously evaluated.

3. *The proposed change does not involve a significant reduction in the margin of safety.*

The requirements defining and governing secondary containment operability and functionality, that is, Standby Gas Treatment system flow rate and secondary containment negative pressure and drawdown limits, will not be changed. The secondary containment, including its access openings will function as presently described in the Updated Final Safety Analysis Report (UFSAR) and will be subject to the same structural and functional requirements. Therefore, this change can not, and does not, reduce any margin of safety associated with the secondary containment function.

Based upon the preceding information, SNC has concluded that the requested change does not involve a significant hazards consideration.

**Environmental Evaluation**

10CFR51.22(c)(9) provides criteria for identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed license amendment will not:

1. involve a significant hazards consideration,
2. result in a significant change in the types, or a significant increase in the amounts, of any effluents that may be released offsite,
3. result in a significant increase in individual or cumulative occupational radiation exposure.

No Significant Hazards Evaluation and the Environmental Evaluation

SNC has determined the proposed Licensing amendment meets the eligibility requirements for categorical exclusion as set forth in 10CFR51.22. Accordingly, pursuant to 10CFR51.22, no environmental impact statement associated with the issuance of the amendments for the proposed change needs to be prepared. The basis for this determination is as follows:

1. As described in Enclosure 2, the proposed change does not involve a significant hazards consideration.
2. The proposed change does not result in a significant change in the types of effluents or the amounts of effluents released offsite. The proposed change is administrative and consistent with TSTF Standard Technical Specification Change Traveler TSTF-18, Revision 1, and Revision 2 of Volume 1 of NUREG-1433. The proposed change makes no physical or operating change to the radioactive waste systems or the processing of those wastes. Finally, this Licensing amendment proposes no change to any effluent release limit.
3. The proposed change does not alter individual or cumulative radiation exposure. The proposed change is administrative and consistent with TSTF Standard Technical Specification Change Traveler TSTF-18, Revision 1, and Revision 2 of Volume 1 of NUREG-1433. Neither the secondary containment boundary nor the access door configuration will be altered by or because of the proposed change to the surveillance requirement. Normal access to and egress from the secondary containment will not be affected; therefore, normal radiation exposures will remain unchanged.

Likewise, the requirements defining and governing secondary containment operability and functionality, that is, Standby Gas Treatment system flow rate and secondary containment negative pressure and drawdown limits, will not be changed. The secondary containment, including its access openings, will remain physically unaltered, will function as presently described in the Updated Final Safety Analysis Report, and will be subject to the same structural and functional requirements. Therefore, accident exposures will remain unchanged.

Enclosure 3

Edwin I. Hatch Nuclear Plant  
Technical Specifications Revision to  
Secondary Containment Access Door Surveillance

Page Change Instructions  
and  
Published and Marked-up Technical Specifications and Bases Pages

**Unit 1**

Remove  
3.6-33  
B 3.6-75  
B 3.6-76

Replace  
3.6-33  
B 3.6-75  
B 3.6-76

**Unit 2**

Remove  
3.6-34  
B 3.6-81  
B 3.6-82

Replace  
3.6-34  
B 3.6-81  
B 3.6-82

**ACTIONS**

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. (continued)	C.2 Suspend CORE ALTERATIONS.	Immediately
	<u>AND</u> C.3 Initiate action to suspend OPDRVs.	Immediately

**SURVEILLANCE REQUIREMENTS**

SURVEILLANCE	FREQUENCY
SR 3.6.4.1.1 Verify all secondary containment equipment hatches are closed and sealed.	31 days
SR 3.6.4.1.2 Verify one secondary containment access door in each access opening is closed.	31 days
SR 3.6.4.1.3 -----NOTE----- The number of standby gas treatment (SGT) subsystem(s) required for this Surveillance is dependent on the secondary containment configuration, and shall be one less than the number required to meet LCO 3.6.4.3, "Standby Gas Treatment (SGT) System," for the given configuration. ----- Verify required SGT subsystem(s) will draw down the secondary containment to $\geq 0.20$ inch of vacuum water gauge in $\leq 120$ seconds.	24 months on a STAGGERED TEST BASIS

(continued)



BASES

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ACTIONS

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

case, inability to suspend movement of 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 and SR 3.6.4.1.2

Verifying that secondary containment equipment hatches and one access door in each access opening 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. SR 3.6.4.1.1 also requires equipment hatches to be sealed. 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. An access opening contains one inner and one outer door. The intent is not to breach the secondary containment at any time when secondary containment is required. This is achieved by maintaining the inner or outer portion of the barrier closed at all times. However, all secondary containment access doors are normally kept closed, except when the access opening is being used for entry and exit or when maintenance is being performed on an access opening. When the secondary containment configuration excludes Zone I and/or Zone II, these SRs also include verifying the hatches and doors separating the common refueling floor zone from the reactor building(s). 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 indications of door and hatch status that are available to the operator.

SR 3.6.4.1.3 and SR 3.6.4.1.4

The Unit 1 and Unit 2 SGT Systems exhaust the secondary containment atmosphere to the environment through appropriate treatment equipment. To ensure that all fission products are treated, SR 3.6.4.1.3 verifies that the appropriate SGT System(s) will rapidly establish and maintain a negative pressure in the secondary containment. This is confirmed by demonstrating that the required SGT subsystem(s) will draw down the secondary containment to  $\geq 0.20$  inch of vacuum water gauge in  $\leq 120$  seconds. This cannot be accomplished if the secondary containment boundary is not intact. SR 3.6.4.1.4 demonstrates that the required SGT subsystem(s) can

(continued)

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BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.6.4.1.3 and SR 3.6.4.1.4 (continued)

maintain  $\geq 0.20$  inch of vacuum water gauge for 1 hour at a flow rate  $\leq 4000$  cfm for each SGT subsystem. The 1 hour test period allows secondary containment to be in thermal equilibrium at steady state conditions. Therefore, these two tests are used to ensure secondary containment boundary integrity. Since these SRs are secondary containment tests, they need not be performed with each SGT subsystem. The SGT subsystems are tested on a STAGGERED TEST BASIS, however, to ensure that in addition to the requirements of LCO 3.6.4.3, each SGT subsystem or combination of subsystems will perform this test. The number of SGT subsystems and the required combinations are dependent on the configuration of the secondary containment and are detailed in the Technical Requirements Manual (Ref. 3). The Note to SR 3.6.4.1.3 and SR 3.6.4.1.4 specifies that the number of required SGT subsystems be one less than the number required to meet LCO 3.6.4.3, "Standby Gas Treatment (SGT) System," for the given configuration. The 24 month Frequency, on a STAGGERED TEST BASIS, of SRs 3.6.4.1.3 and 3.6.4.1.4 is also based on a review of the surveillance test history and Reference 5.

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REFERENCES

1. FSAR, Section 14.4.3.
  2. FSAR, Section 14.4.4.
  3. Technical Requirements Manual.
  4. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.
  5. NRC Safety Evaluation Report for Amendment 232.
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**ACTIONS**

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. (continued)	C.2 Suspend CORE ALTERATIONS.	Immediately
	<u>AND</u> C.3 Initiate action to suspend OPDRVs.	Immediately

**SURVEILLANCE REQUIREMENTS**

SURVEILLANCE	FREQUENCY
SR 3.6.4.1.1 Verify all secondary containment equipment hatches are closed and sealed.	31 days
SR 3.6.4.1.2 Verify one secondary containment access door in each access opening is closed.	31 days
SR 3.6.4.1.3 -----NOTE----- The number of standby gas treatment (SGT) subsystem(s) required for this Surveillance is dependent on the secondary containment configuration, and shall be one less than the number required to meet LCO 3.6.4.3, "Standby Gas Treatment (SGT) System," for the given configuration. ----- Verify required SGT subsystem(s) will draw down the secondary containment to $\geq 0.20$ inch of vacuum water gauge in $\leq 120$ seconds.	24 months on a STAGGERED TEST BASIS

(continued)

BASES

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ACTIONS

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

inability to suspend movement of 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 and SR 3.6.4.1.2

Verifying that secondary containment equipment hatches and one access door in each access opening 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. SR 3.6.4.1.1 also requires equipment hatches to be sealed. 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. An access opening contains one inner and one outer door. The intent is not to breach the secondary containment at any time when secondary containment is required. This is achieved by maintaining the inner or outer portion of the barrier closed at all times. However, all secondary containment access doors are normally kept closed, except when the access opening is being used for entry and exit or when maintenance is being performed on an access opening. When the secondary containment configuration excludes Zone I and/or Zone II, these SRs also include verifying the hatches and doors separating the common refueling floor zone from the reactor building(s). 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 indications of door and hatch status that are available to the operator.

SR 3.6.4.1.3 and SR 3.6.4.1.4

The Unit 1 and Unit 2 SGT Systems exhausts the secondary containment atmosphere to the environment through appropriate treatment equipment. To ensure that all fission products are treated, SR 3.6.4.1.3 verifies that the appropriate SGT System(s) will rapidly establish and maintain a negative pressure in the secondary containment. This is confirmed by demonstrating that the required SGT subsystem(s) will draw down the secondary containment to  $\geq 0.20$  inch of vacuum water gauge in  $\leq 120$  seconds. This cannot be accomplished if the secondary containment boundary is not intact. SR 3.6.4.1.4 demonstrates that the required SGT subsystem(s) can

(continued)

BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.6.4.1.3 and SR 3.6.4.1.4 (continued)

maintain  $\geq 0.20$  inch of vacuum water gauge for 1 hour at a flow rate  $\leq 4000$  cfm for each SGT subsystem. The 1 hour test period allows secondary containment to be in thermal equilibrium at steady state conditions. Therefore, these two tests are used to ensure secondary containment boundary integrity. Since these SRs are secondary containment tests, they need not be performed with each SGT subsystem. The SGT subsystems are tested on a STAGGERED TEST BASIS, however, to ensure that in addition to the requirements of LCO 3.6.4.3, each SGT subsystem or combination of subsystems will perform this test. The number of SGT subsystems and the required combinations are dependent on the configuration of the secondary containment and are detailed in the Technical Requirements Manual (Ref. 3). The Note to SR 3.6.4.1.3 and SR 3.6.4.1.4 specifies that the number of required SGT subsystems be one less than the number required to meet LCO 3.6.4.3, "Standby Gas Treatment (SGT) System," for the given configuration. The 24 month Frequency, on a STAGGERED TEST BASIS, of SRs 3.6.4.1.3 and 3.6.4.1.4 is also based on a review of the surveillance test history and Reference 5.

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REFERENCES

1. FSAR, Section 15.1.39.
  2. FSAR, Section 15.1.41.
  3. Technical Requirements Manual.
  4. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.
  5. NRC Safety Evaluation Report for Amendment 174.
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ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. (continued)	C.2 Suspend CORE ALTERATIONS.	Immediately
	<u>AND</u> C.3 Initiate action to suspend OPDRVs.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.4.1.1	Verify all secondary containment equipment hatches are closed and sealed.	31 days
SR 3.6.4.1.2	<del>Verify each secondary containment access door is closed, except when the access opening is being used for entry and exit, then at least one door shall be closed. <u>Verify one secondary containment access door in each access opening is closed.</u></del>	31 days
SR 3.6.4.1.3	<p>-----NOTE-----                      The number of standby gas treatment (SGT) subsystem(s) required for this Surveillance is dependent on the secondary containment configuration, and shall be one less than the number required to meet LCO 3.6.4.3, "Standby Gas Treatment (SGT) System," for the given configuration.</p> <p>-----</p> <p>Verify required SGT subsystem(s) will draw down the secondary containment to <math>\geq 0.20</math> inch of vacuum water gauge in <math>\leq 120</math> seconds.</p>	24 months on a STAGGERED TEST BASIS

(continued)

## BASES

## ACTIONS

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

case, inability to suspend movement of irradiated fuel assemblies would not be a sufficient reason to require a reactor shutdown.

SURVEILLANCE  
REQUIREMENTSSR 3.6.4.1.1 and SR 3.6.4.1.2

Verifying that secondary containment equipment hatches and **one access door in each access opening** 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. SR 3.6.4.1.1 also requires equipment hatches to be sealed. In this application, the term "sealed" has no connotation of leak tightness. Maintaining secondary containment OPERABILITY requires verifying **one door in the access opening** each door in the access opening is closed except when the access opening is being used for normal transient entry and exit (then at least one door must remain closed). **An access opening contains one inner and one outer door. The intent is not to breach the secondary containment at any time when secondary containment is required. This is achieved by maintaining the inner or outer portion of the barrier closed at all times. However, all secondary containment access doors are normally kept closed, except when the access opening is being used for entry and exit or when maintenance is being performed on an access opening.** When the secondary containment configuration excludes Zone I and/or Zone II, these SRs also include verifying the hatches and doors separating the common refueling floor zone from the reactor building(s). 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 indications of door and hatch status that are available to the operator.

SR 3.6.4.1.3 and SR 3.6.4.1.4

The Unit 1 and Unit 2 SGT Systems exhaust the secondary containment atmosphere to the environment through appropriate treatment equipment. To ensure that all fission products are treated, SR 3.6.4.1.3 verifies that the appropriate SGT System(s) will rapidly

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. (continued)	C.2 Suspend CORE ALTERATIONS.	Immediately
	<u>AND</u> C.3 Initiate action to suspend OPDRVs.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.4.1.1	Verify all secondary containment equipment hatches are closed and sealed.	31 days
SR 3.6.4.1.2	<del>Verify each secondary containment access door is closed, except when the access opening is being used for entry and exit, then at least one door shall be closed.</del> <b><u>Verify one secondary containment access door in each access opening is closed.</u></b>	31 days
SR 3.6.4.1.3	-----NOTE----- The number of standby gas treatment (SGT) subsystem(s) required for this Surveillance is dependent on the secondary containment configuration, and shall be one less than the number required to meet LCO 3.6.4.3, "Standby Gas Treatment (SGT) System," for the given configuration. ----- Verify required SGT subsystem(s) will draw down the secondary containment to $\geq 0.20$ inch of vacuum water gauge in $\leq 120$ seconds.	24 months on a STAGGERED TEST BASIS

(continued)



BASES

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

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

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SURVEILLANCE                      SR 3.6.4.1.1 and SR 3.6.4.1.2  
REQUIREMENTS

Verifying that secondary containment equipment hatches and **one access door in each access opening** 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. SR 3.6.4.1.1 also requires equipment hatches to be sealed. In this application, the term "sealed" has no connotation of leak tightness. Maintaining secondary containment OPERABILITY requires verifying **one door in the access opening** each door in the access opening is closed except when the access opening is being used for normal transient entry and exit (then at least one door must remain closed). **An access opening contains one inner and one outer door. The intent is not to breach the secondary containment at any time when secondary containment is required. This is achieved by maintaining the inner or outer portion of the barrier closed at all times. However, all secondary containment access doors are normally kept closed, except when the access opening is being used for entry and exit or when maintenance is being performed on an access opening.** When the secondary containment configuration excludes Zone I and/or Zone II, these SRs also include verifying the hatches and doors separating the common refueling floor zone from the reactor building(s). 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 indications of door and hatch status that are available to the operator.

SR 3.6.4.1.3 and SR 3.6.4.1.4

The Unit 1 and Unit 2 SGT Systems exhausts the secondary containment atmosphere to the environment through appropriate treatment equipment. To ensure that all fission products are treated, SR 3.6.4.1.3 verifies that the appropriate SGT System(s) will rapidly establish and maintain a negative pressure in the secondary containment. This is confirmed by demonstrating that the required SGT subsystem(s) will draw down the secondary containment to  $\geq 0.20$  inch of vacuum water gauge in  $\leq 120$  seconds. This cannot