

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 ≥ 0.20 inch of vacuum water gauge in ≤ 120 seconds.	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
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 ≥ 0.20 inch of vacuum water gauge in ≤ 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

SURVEILLANCE
REQUIREMENTS

SR 3.6.4.1.3 and SR 3.6.4.1.4 (continued)

maintain ≥ 0.20 inch of vacuum water gauge for 1 hour at a flow rate ≤ 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.

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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(continued)

BASES

ACTIONS

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

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SURVEILLANCE
REQUIREMENTS

SR 3.6.4.1.1 and SR 3.6.4.1.2

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SURVEILLANCE
REQUIREMENTS

SR 3.6.4.1.3 and SR 3.6.4.1.4 (continued)

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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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