

REFUELING OPERATIONS

3/4.9.9 CONTAINMENT VENTILATION ISOLATION SYSTEM

LIMITING CONDITION FOR OPERATION

3.9.9 The Containment Ventilation Isolation System shall be OPERABLE.

APPLICABILITY: During CORE ALTERATIONS or movement of irradiated fuel within the containment.

ACTION:

- a. With the Containment Ventilation Isolation System inoperable, close each of the containment purge makeup and exhaust penetrations providing direct access from the containment atmosphere to the outside atmosphere.*
- b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.9.9 The Containment Ventilation Isolation System shall be demonstrated OPERABLE within 100 hours prior to the start of and at least once per 7 days during CORE ALTERATIONS by verifying that containment ventilation isolation occurs on a two-out-of-four High Radiation test signal from the containment area radiation monitors (Table 3.3-6, item 1.a) and by verifying that isolation occurs for each valve using its control switch in the main control room.

*Penetration flow path(s) providing direct access from the containment atmosphere to the outside atmosphere may be opened under administrative controls.

REFUELING OPERATIONS

BASES

CONTAINMENT VENTILATION ISOLATION SYSTEM (Continued)

Penetrations applicable to Technical Specification 3.9.9 may be opened provided the following administrative controls are in effect:

1. An individual or individuals shall be designated and available at all times, capable of isolating the breached penetration.
2. The breached penetration shall not be obstructed unless capability for rapid removal of obstructions is provided (such as quick disconnects for hoses).

The LCO is modified by a Note allowing penetration flow paths providing direct access from the containment atmosphere to the outside atmosphere to be open under administrative controls. Administrative controls ensure that 1) appropriate personnel are aware of the open status of the penetration flow path during CORE ALTERATIONS or movement of irradiated fuel assemblies within containment, and 2) specified individuals are designated and readily available to isolate the flow path in the event of a fuel handling accident.

The allowance to have containment penetration (including the airlock doors and equipment hatch) flow paths with direct access from the containment atmosphere to the outside atmosphere to be unisolated during fuel movement and CORE ALTERATIONS is based on 1) confirmatory dose calculations as approved by the NRC staff which indicate acceptable radiological consequences and 2) commitments from the licensee to implement acceptable administrative procedures that ensure in the event of a refueling accident that the airlock or equipment hatch can and will be promptly closed following containment evacuation (even though the containment fission product control function is not required to meet acceptable dose consequences) and the open penetration(s) can and will be promptly closed. The time to close such penetrations or combination of penetrations shall be included in the confirmatory dose calculations.

3/4.9.10 AND 3/4.9.11 WATER LEVEL - REACTOR VESSEL AND NEW AND SPENT FUEL POOLS

The restrictions on minimum water level ensure that sufficient water depth is available to remove 99% of the assumed iodine gas activity released from the rupture of an irradiated fuel assembly. The minimum water depth is consistent with the assumptions of the safety analysis.

According to Regulatory Guide 1.25, Revision 0, there is 23 feet of water between the top of the damaged fuel bundle and the fuel pool surface during a fuel handling accident. With 23 feet of water, the assumptions of Regulatory Guide 1.25, Revision 0, can be used directly. In practice, this LCO preserves this assumption for the bulk of the fuel in the storage racks. In the case of a single bundle dropped and lying horizontal on top of the spent fuel racks; however, there may be <23 feet of water above the top of the fuel bundle and the surface, indicated by the width of the bundle. To offset this small nonconservatism, the analysis assumes that all fuel rods fail.

REFUELING OPERATIONS

BASES

3/4.9.12 FUEL HANDLING BUILDING EMERGENCY EXHAUST SYSTEM

The limitations on the Fuel Handling Building Emergency Exhaust System ensure that all radioactive material released from an irradiated fuel assembly will be filtered through the HEPA filters and charcoal adsorber prior to discharge to the atmosphere. Operation of the system with the heaters operating for at least 10 continuous hours in a 31-day period is sufficient to reduce the buildup of moisture on the adsorbers and HEPA filters. The OPERABILITY of this system and the resulting iodine removal capacity are consistent with the assumptions of the safety analyses. ANSI N510-1980 will be used as a procedural guide for surveillance testing. Criteria for laboratory testing of charcoal and for in-place testing of HEPA filters and charcoal adsorbers is based upon removal efficiencies of 95% for organic and elemental forms of radioiodine and 99% for particulate forms. The filter pressure drop was chosen to be half-way between the estimated clean and dirty pressure drops for these components. This assures the full functionality of the filters for a prolonged period, even at the Technical Specification limit.

The LCO is modified by a note allowing the Fuel Handling Building Emergency Exhaust System (FHBEES) ventilation boundary to be opened intermittently under administrative controls. For entry and exit through doors, the administrative control of opening is performed by the person(s) entering or exiting the area. For other openings, these controls consist of stationing a dedicated individual at the opening who is in continuous communication with the control room. This individual will have a method to rapidly close the opening when a need for FHBEES isolation is indicated.