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LIMITING CONDITION FOR OPERATION AND SURVEILLANCE REQUIREMENTS

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DEFINITIONS

CONTAINMENT INTEGRITY

1.8 CONTAINMENT INTEGRITY shall exist when:

1.8.1 All penetrations required to be closed during accident conditions are either:

- a) Capable of being closed by an OPERABLE containment automatic isolation valve system,* or
- b) Closed by manual valves, blind flanges, or deactivated automatic valves secured in their closed positions, except for valves that are open under administrative control as permitted by Specification 3.6.3.1,

1.8.2 The equipment hatch is closed and sealed, and

1.8.3 The airlock is in compliance with the requirements of Specification 3.6.1.3.

CHANNEL CALIBRATION

1.9 A CHANNEL CALIBRATION shall be the adjustment, as necessary, of the channel output such that it responds with the necessary range and accuracy to known values of the parameter which the channel monitors. The CHANNEL CALIBRATION shall encompass the entire channel including the sensor and alarm and/or trip functions, and shall include the CHANNEL FUNCTIONAL TEST. The CHANNEL CALIBRATION may be performed by any series of sequential, overlapping or total channel steps such that the entire channel is calibrated.

CHANNEL CHECK

1.10 A CHANNEL CHECK shall be the qualitative assessment of channel behavior during operation by observation. This determination shall include, where possible, comparison of the channel indication and/or status with other indications and/or status derived from independent instrument channels measuring the same parameter.

CHANNEL FUNCTIONAL TEST

1.11 A CHANNEL FUNCTIONAL TEST shall be the injection of a simulated signal into the channel as close to the primary sensor as practicable to verify OPERABILITY including alarm and/or trip functions.

* In MODE 4, the requirement for an OPERABLE containment automatic isolation valve system is satisfied by use of the containment isolation trip pushbuttons.

3/4.6 CONTAINMENT SYSTEMS

3/4.6.1 PRIMARY CONTAINMENT

CONTAINMENT INTEGRITY

LIMITING CONDITION FOR OPERATION

3.6.1.1 Primary CONTAINMENT INTEGRITY shall be maintained.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

Without primary CONTAINMENT INTEGRITY, restore CONTAINMENT INTEGRITY within one hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the next 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.1.1 Primary CONTAINMENT INTEGRITY shall be demonstrated:

- a. At least once per 31 days by verifying that all penetrations ⁽¹⁾ not capable of being closed by OPERABLE containment automatic isolation valves ⁽²⁾ and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in their positions, ⁽³⁾ except for valves that are open under administrative control as permitted by Specification 3.6.3.1.
- b. At least once per 31 days by verifying the equipment hatch is closed and sealed.
- c. By verifying the containment air lock is in compliance with the requirements of Specification 3.6.1.3.
- d. After each closing of a penetration subject to type B testing (except the containment air lock), if opened following a Type A or B test, by leak rate testing in accordance with the Containment Leakage Rate Testing Program.
- e. By verifying structural integrity in accordance with the Containment Tendon Surveillance Program.

(1) Except valves, blind flanges, and deactivated automatic valves which are located inside the containment and are locked, sealed, or otherwise secured in the closed position. These penetrations shall be verified closed prior to entering MODE 4 from MODE 5, if not performed within the previous 92 days.

(2) In MODE 4, the requirement for an OPERABLE containment automatic isolation valve system is satisfied by use of the containment isolation trip pushbuttons

(3) Isolation devices in high radiation areas may be verified by use of administrative means.

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CONTAINMENT SYSTEMS

3/4.6.3 CONTAINMENT ISOLATION VALVES

LIMITING CONDITION FOR OPERATION

3.6.3.1 Each containment isolation valve shall be OPERABLE. ⁽¹⁾ ⁽²⁾

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With one or more of the isolation valve(s) inoperable, either:

- a. Restore the inoperable valve(s) to OPERABLE status within 4 hours, or
- b. Isolate the affected penetration(s) within 4 hours by use of a deactivated automatic valve(s) secured in the isolation position(s), or
- c. Isolate the affected penetration(s) within 4 hours by use of a closed manual valve(s) or blind flange(s); or
- d. Isolate the affected penetration that has only one containment isolation valve and a closed system within 72 hours by use of at least one closed and deactivated automatic valve, closed manual valve, or blind flange; or
- e. Be in COLD SHUTDOWN within the next 36 hours.

SURVEILLANCE REQUIREMENTS

4.6.3.1 Each containment isolation valve shall be demonstrated OPERABLE:

- a. By verifying the isolation time of each power operated automatic containment isolation valve when tested pursuant to Specification 4.0.5.
- b. At least once per 18 months by verifying each automatic containment isolation valve that is not locked, sealed, or otherwise secured in position, actuates to the isolation position on an actual or simulated actuation signal.

(1) Containment isolation valves may be opened on an intermittent basis under administrative controls.

(2) The provisions of this Specification in MODES 1, 2 and 3, are not applicable for main steam line isolation valves. However, provisions of Specification 3.7.1.5 are applicable for main steam line isolation valves.

CONTAINMENT SYSTEMS

BASES

3/4.6.1.4 INTERNAL PRESSURE

The limitations on containment internal pressure ensure that the containment peak pressure does not exceed the design pressure of 54 psig during MSLB or LOCA conditions.

The maximum peak pressure is obtained from a MSLB event. The limit of 1.0 psig for initial positive containment pressure will limit the total pressure to less than the design pressure and is consistent with the accident analyses.

3/4.6.1.5 AIR TEMPERATURE

The limitation on containment air temperature ensures that the containment air temperature does not exceed the worst case combined LOCA/MSLB air temperature profile and the liner temperature of 289°F. The containment air and liner temperature limits are consistent with the accident analyses.

The temperature detectors used to monitor primary containment air temperature are located on the 38 ft. 6 in. floor elevation in containment. The detectors are located approximately 6 feet above the floor, on the southeast and southwest containment walls.

3/4.6.1.6 DELETED

CONTAINMENT SYSTEMS

BASES

3/4.6.2.1 CONTAINMENT SPRAY AND COOLING SYSTEMS (Continued)

pressure measurement instrument inaccuracies are already reflected in the Technical Specification acceptance criteria.

3/4.6.3 CONTAINMENT ISOLATION VALVES

The Technical Requirements Manual contains the list of containment isolation valves (except the containment air lock and equipment hatch). Any changes to this list will be reviewed under 10CFR50.59 and approved by the committee(s) as described in the QAP Topical Report. |

The OPERABILITY of the containment isolation valves ensures that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment. Containment isolation within the time limits specified ensures that the release of radioactive material to the environment will be consistent with the assumptions used in the analyses for a LOCA.

The containment isolation valves are used to close all fluid (liquid and gas) penetrations not required for operation of the engineered safety feature systems, to prevent the leakage of radioactive materials to the environment. The fluid penetrations which may require isolation after an accident are categorized as Type P, O, or N. The penetration types are listed with the containment isolation valves in the Technical Requirements Manual.

Type P penetrations are lines that connect to the reactor coolant pressure boundary (Criterion 55 of 10CFR50, Appendix A). These lines are provided with two containment isolation valves, one inside containment, and one outside containment.

Type O penetrations are lines that are open to the containment internal atmosphere (Criterion 56 of 10CFR50, Appendix A). These lines are provided with two containment isolation valves, one inside containment, and one outside containment.

Type N penetrations are lines that neither connect to the reactor coolant pressure boundary nor are open to the containment internal atmosphere, but do form a closed system within the containment structure (Criterion 57 of 10CFR50, Appendix A). These lines are provided with single containment isolation valves outside containment. These valves are either remotely operated or locked closed manual valves.

With one or more penetration flow paths with one containment isolation valve inoperable, the inoperable valve must be restored to OPERABLE status or the affected penetration flow path must be isolated. The method of isolation must include the use of at least one isolation barrier that cannot be adversely affected by a single active failure. Isolation barriers that meet this criterion are a closed and de-activated automatic valve, a closed manual valve, and a blind flange. A check valve may not be used to isolate the affected penetration. |

CONTAINMENT SYSTEMS

BASES

3/4.6.3 CONTAINMENT ISOLATION VALVES (continued)

If the containment isolation valve on a closed system becomes inoperable, the remaining barrier is a closed system since a closed system is an acceptable alternative to an automatic valve. However, actions must still be taken to meet Technical Specification ACTION 3.6.3.1.d and the valve, not normally considered as a containment isolation valve, and closest to the containment wall should be put into the closed position. No leak testing of the alternate valve is necessary to satisfy the action statement. Placing the manual valve in the closed position sufficiently deactivates the penetration for Technical Specification compliance. Closed system isolation valves applicable to Technical Specification ACTION 3.6.3.1.d are included in FSAR Table 5.2-11, and are the isolation valves for those penetrations credited as General Design Criteria 57, (Type N penetrations). The specified time (i.e., 72 hours) of Technical Specification ACTION 3.6.3.1.d is reasonable, considering the relative stability of the closed system (hence, reliability) to act as a penetration isolation boundary and the relative importance of supporting containment OPERABILITY during MODES 1, 2, 3 and 4. In the event the affected penetration is isolated in accordance with 3.6.3.1.d, the affected penetration flow path must be verified to be isolated on a periodic basis, (Surveillance Requirement 4.6.1.1.a). This is necessary to assure leak tightness of containment and that containment penetrations requiring isolation following an accident are isolated. The frequency of once per 31 days in this surveillance for verifying that each affected penetration flow path is isolated is appropriate considering the valves are operated under administrative controls and the probability of their misalignment is low.

For the purposes of meeting this LCO, neither the containment isolation valve, nor any alternate valve on a closed system have a leakage limit associated with valve operability.

Containment isolation valves may be opened on an intermittent basis provided appropriate administrative controls are established. The position of the NRC concerning acceptable administrative controls is contained in Generic Letter 91-08, "Removal of Component Lists from Technical Specifications," and includes the following considerations:

- (1) stationing an operator, who is in constant communication with the control room, at the valve controls,
- (2) instructing this operator to close these valves in an accident situation, and
- (3) assuring that environmental conditions will not preclude access to close the valve and that this action will prevent the release of radioactivity outside the containment.

CONTAINMENT SYSTEMS

BASES

3/4.6.3 CONTAINMENT ISOLATION VALVES (continued)

The appropriate administrative controls, based on the above considerations, to allow containment isolation valves to be opened are contained in the procedures that will be used to operate the valves. Entries should be placed in the Shift Manager Log when these valves are opened and closed. However, it is not necessary to log into any Technical Specification Action Statement for these valves, provided the appropriate administrative controls have been established.

If a containment isolation valve is opened while operating in accordance with Abnormal or Emergency Operating Procedures (AOPs and EOPs), it is not necessary to establish a dedicated operator. The AOPs and EOPs provide sufficient procedural control over the operation of the containment isolation valves.

Opening a closed containment isolation valve bypasses a plant design feature that prevents the release of radioactivity outside the containment. Therefore, this should not be done frequently, and the time the valve is opened should be minimized. As a general guideline, a closed containment isolation valve should not be opened longer than the time allowed to restore the valve to OPERABLE status, as stated in the action statement for LCO 3.6.3.1 "Containment Isolation Valves."

A discussion of the appropriate administrative controls for the containment isolation valves, that are expected to be opened during operation in MODES 1 through 4, is presented below.

Manual containment isolation valve 2-SI-463, safety injection tank (SIT) recirculation header stop valve, is opened to fill or drain the SITs and for Shutdown Cooling System (SDC) boron equalization. While 2-SI-463 is open, a dedicated operator, in continuous communication with the control room, is required.

When SDC is initiated, SDC suction isolation remotely operated valves 2-SI-652 and 2-SI-651 (inside containment isolation valve) and manual valve 2-SI-709 (outside containment isolation valve) are opened. 2-SI-651 is normally operated from the control room. While in Modes 1, 2 or 3, 2-SI-651 is closed with manual disconnect switch NSI631 locked open to satisfy Appendix R requirements. It does not receive an automatic containment isolation closure signal, but is interlocked to prevent opening if Reactor Coolant System (RCS) pressure is greater than approximately 275 psia. When 2-SI-651 is opened from the control room, either one of the two required licensed (Reactor Operator) control room operators can be credited as the dedicated operator required for administrative control. It is not necessary to use a separate dedicated operator.

When valve 2-SI-709 is opened locally, a separate dedicated operator is not required to remain at the valve. 2-SI-709 is opened before 2-SI-651. Therefore, opening 2-SI-709 will not establish a connection between the RCS and the SDC System. Opening 2-SI-651 will connect the RCS and SDC System. If a problem then develops, 2-SI-651 can be closed from the control room.

CONTAINMENT SYSTEMS

BASES

3/4.6.3 CONTAINMENT ISOLATION VALVES (continued)

The administrative controls for valves 2-SI-651 and 2-SI-709 apply only during preparation for initiation of SDC, and during SDC operation. They are acceptable because RCS pressure and temperature are significantly below normal operating pressure and temperature when 2-SI-651 and 2-SI-709 are opened, and these valves are not opened until shortly before SDC flow is initiated. The penetration flowpath can be isolated from the control room by closing either 2-SI-652 or 2-SI-651, and the manipulation of these valves, during this evolution, is controlled by plant procedures.

The pressurizer auxiliary spray valve, 2-CH-517, can be used as an alternate method to decrease pressurizer pressure, or for boron precipitation control following a loss of coolant accident. When this valve is opened from the control room, either one of the two required licensed (Reactor Operator) control room operators can be credited as the dedicated operator required for administrative control. It is not necessary to use a separate dedicated operator.

The exception for 2-CH-517 is acceptable because the fluid that passes through this valve will be collected in the Pressurizer (reverse flow from the Pressurizer to the charging system is prevented by check valve 2-CH-431), and the penetration associated with 2-CH-517 is open during accident conditions to allow flow from the charging pumps. Also, this valve is normally operated from the control room, under the supervision of the licensed control room operators, in accordance with plant procedures.

A dedicated operator is not required when opening remotely operated valves associated with Type N fluid penetrations (Criterion 57 of 10CFR50, Appendix A). Operating these valves from the control room is sufficient. The main steam isolation valves (2-MS-64A and 64B), atmospheric steam dump valves (2-MS-190A and 190B), and the containment air recirculation cooler RBCCW discharge valves (2-RB-28.2A-D) are examples of remotely operated containment isolation valves associated with Type N fluid penetrations.

MSIV bypass valves 2-MS-65A and 65B are remotely operated MOVs, but while in MODE 1, they are closed with power to the valve motors removed via lockable disconnect switches located at their respective MCC to satisfy Appendix "R" requirements.

Local operation of the atmospheric steam dump valves (2-MS-190A and 190B), or other remotely operated valves associated with Type N fluid penetrations, will require a dedicated operator in constant communication with the control room, except when operating in accordance with AOPs or EOPs. Even though these valves can not be classified as locked or sealed closed, the use of a dedicated operator will satisfy administrative control requirements. Local operation of these valves with a dedicated operator is equivalent to the operation of other manual (locked or sealed closed) containment isolation valves with a dedicated operator.

CONTAINMENT SYSTEMS

BASES

3/4.6.3 CONTAINMENT ISOLATION VALVES (continued)

The main steam supplies to the turbine driven auxiliary feedwater pump (2-MS-201 and 2-MS-202) are remotely operated valves associated with Type N fluid penetrations. These valves are maintained open during power operation. 2-MS-201 is maintained energized, so it can be closed from the control room, if necessary, for containment isolation. However, 2-MS-202 is deenergized open by removing power to the valve's motor via a lockable disconnect switch to satisfy Appendix R requirements. Therefore, 2-MS-202 cannot be closed immediately from the control room, if necessary, for containment isolation. The disconnect switch key to power for 2-MS-202 is stored in the Unit 2 control room, and can be used to re-power the valve at the MCC; this will allow the valve to be closed from the control room. It is not necessary to maintain a dedicated operator at 2-MS-202 because this valve is already in the required accident position. Also, the steam that passes through this valve should not contain any radioactivity. The steam generators provide the barrier between the containment and the atmosphere. Therefore, it would take an additional structural failure for radioactivity to be released to the environment through this valve.

Steam generator chemical addition valves, 2-FW-15A and 2-FW-15B, are opened to add chemicals to the steam generators using the Auxiliary Feedwater System (AFW). When either 2-FW-15A or 2-FW-15B is opened, a dedicated operator, in continuous communication with the control room, is required. Operation of these valves is expected during plant startup and shutdown.

The bypasses around the main steam supplies to the turbine driven auxiliary feedwater pump (2-MS-201 and 2-MS-202), 2-MS-458 and 2-MS-459, are opened to drain water from the steam supply lines. When either 2-MS-458 or 2-MS-459 is opened, a dedicated operator, in continuous communication with the control room, is required. Operation of these valves is expected during plant startup.

The containment station air header isolation, 2-SA-19, is opened to supply station air to containment. When 2-SA-19 is opened, a dedicated operator, in continuous communication with the control room, is required. Operation of this valve is only expected for maintenance activities inside containment.

The backup air supply master stop, 2-IA-566, is opened to supply backup air to 2-CH-517, 2-CH-518, 2-CH-519, 2-EB-88, and 2-EB-89. When 2-IA-566 is opened, a dedicated operator, in continuous communication with the control room, is required. Operation of this valve is only expected in response to a loss of the normal air supply to the valves listed.

The nitrogen header drain valve, 2-SI-045, is opened to depressurize the containment side of the nitrogen supply header stop valve, 2-SI-312. When 2-SI-045 is opened, a dedicated operator, in continuous communication with the control room, is required. Operation of this valve is only expected after using the high pressure nitrogen system to raise SIT nitrogen pressure.

CONTAINMENT SYSTEMS

BASES

3/4.6.3 CONTAINMENT ISOLATION VALVES (continued)

The containment waste gas header test connection isolation valve, 2-GR-63, is opened to sample the primary drain tank for oxygen and nitrogen. When 2-GR-63 is opened, a dedicated operator, in continuous communication with the control room, is required. Operation of this valve is expected during plant startup and shutdown.

The upstream vent valves for the steam generator atmospheric dump valves, 2-MS-369 and 2-MS-371, are opened during steam generator safety valve set point testing to allow steam header pressure instrumentation to be placed in service. When either 2-MS-369 or 2-MS-371 is opened, a dedicated operator in continuous communication with the control room is required.

The determination of the appropriate administrative controls for these containment isolation valves included an evaluation of the expected environmental conditions. This evaluation has concluded environmental conditions will not preclude access to close the valve, and this action will prevent the release of radioactivity outside of containment through the respective penetration.

The containment purge supply and exhaust isolation valves are required to be sealed closed during plant operation since these valves have not been demonstrated capable of closing during a LOCA or steam line break accident. Such a demonstration would require justification of the mechanical operability of the purge valves and consideration of the appropriateness of the electrical override circuits. Maintaining these valves closed during plant operations ensures that excessive quantities of radioactive materials will not be released via the containment purge system. The containment purge supply and exhaust isolation valves are sealed closed by removing power from the valves. This is accomplished by pulling the control power fuses for each of the valves. The associated fuse blocks are then locked. This is consistent with the guidance contained in NUREG-0737 Item II.E.4.2 and Standard Review Plan 6.2.4, "Containment Isolation System," Item II.f.

Surveillance Requirement 4.6.3.1.a verifies the isolation time of each power operated automatic containment isolation valve is within limits to demonstrate OPERABILITY. The isolation time test ensures the valve will isolate in a time period less than or equal to that assumed in the safety analysis. The isolation time and surveillance frequency are in accordance with the Inservice Testing Program.

Surveillance Requirement 4.6.3.1.b demonstrate that each automatic containment isolation valve actuates to the isolation position on an actual or simulated containment isolation signal [containment isolation actuation signal (CIAS) or containment high radiation actuation signal (containment purge valves only)]. This surveillance is not required for valves that are locked, sealed, or otherwise secured in the required position under administrative controls. The 18 month frequency is based on the need to perform these surveillances under the conditions that apply during a plant outage and the potential for unplanned transients if the surveillance was performed with the reactor at power. The 18 month frequency is also acceptable based on consideration of the design reliability (and confirming operating experience) of the equipment. The actuation logic is tested as part of the Engineered Safety Feature Actuation System (ESFAS) testing, and equipment performance is monitored as part of the Inservice Testing Program.

ADMINISTRATIVE CONTROLS

SPECIAL REPORTS (CONT.)

- b. Deleted
- c. Deleted
- d. ECCS Actuation, Specifications 3.5.2 and 3.5.3.
- e. Deleted
- f. Deleted
- g. RCS Overpressure Mitigation, Specification 3.4.9.3.
- h. Deleted
- i. Tendon Surveillance Report, Specification 6.25
- j. Steam Generator Tube Inspection, Specification 4.4.5.1.5.
- k. Accident Monitoring Instrumentation, Specification 3.3.3.8.
- l. Radiation Monitoring Instrumentation, Specification 3.3.3.1.
- m. Deleted

6.10 Deleted.

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 HIGH RADIATION AREA

As provided in paragraph 20.1601(c) of 10 CFR Part 20, the following controls shall be applied to high radiation areas in place of the controls required by paragraph 20.1601(a) and (b) of 10 CFR Part 20:

6.12.1 High Radiation Areas with Dose Rates Not Exceeding 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation

- a. Each entryway to such an area shall be barricaded and conspicuously posted as a high radiation area. Such barricades may be opened as necessary to permit entry or exit of personnel or equipment.
- b. Access to, and activities in, each such area shall be controlled by means of a Radiation Work Permit (RWP) or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures.

ADMINISTRATIVE CONTROLS

6.24 Diesel Fuel Oil Test Program

A diesel fuel oil testing program to implement required testing of both new fuel oil and stored fuel oil shall be established. The program shall include sampling and testing requirements, and acceptance criteria, all in accordance with applicable ASTM Standards. The purpose of the program is to establish the following:

- a. Acceptability of new fuel oil for use prior to addition to storage tanks by determining that the fuel oil has:
 1. An API gravity or an absolute specific gravity within limits,
 2. A flash point and kinematic viscosity within limits for ASTM 2D fuel oil, and
 3. Water and sediment $\leq 0.05\%$.
- b. Within 31 days following addition of the new fuel oil to storage tanks, verify that the properties of the new fuel oil, other than those addressed in a., above, are within limits for ASTM 2D fuel oil, and
- c. Total particulate concentration of the fuel oil is ≤ 10 mg/l when tested every 92 days in accordance with ASTM D-2276-78, Method A.

The provisions of Surveillance Requirements 4.0.2 and 4.0.3 are applicable to the Diesel Fuel Oil Test Program test frequencies.

6.25 Pre-Stressed Concrete Containment Tendon Surveillance Program

This program provides controls for monitoring any tendon degradation in pre-stressed concrete containments, including effectiveness of its corrosion protection medium, to ensure containment structural integrity. The program shall include baseline measurements prior to initial operations. The Tendon Surveillance Program, inspection frequencies, and acceptance criteria shall be in accordance with Regulatory Guide 1.35, Revision 3, 1989.

The provisions of Surveillance Requirements 4.0.2 and 4.0.3 are applicable to the Tendon Surveillance Program inspection frequencies.

Any abnormal degradation of the containment structure detected during the tests required by the Pre-stressed Concrete Containment Tendon Surveillance Program shall be reported to the NRC within 30 days. The report shall include a description of the tendon condition, the condition of the concrete (especially at tendon anchorages), the inspection procedures, the tolerances on cracking, and the corrective action taken. This Tendon Surveillance Report is an administrative requirement listed in Technical Specifications 6.9.2, "Special Reports."