

3.7 PLANT SYSTEMS

3.7.3 Control Room Emergency Ventilation (CREV) System

LCO 3.7.3 Two CREV subsystems shall be OPERABLE.

-----NOTE-----

The main control room boundary may be opened intermittently under administrative control.

APPLICABILITY: MODES 1, 2, and 3,
During movement of irradiated fuel assemblies in the secondary containment,
During CORE ALTERATIONS,
During operations with a potential for draining the reactor vessel (OPDRVs).

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One CREV subsystem inoperable.	A.1 Restore CREV subsystem to OPERABLE status.	7 days
B. Two CREV subsystems inoperable due to inoperable control room boundary in MODES 1, 2, and 3.	B.1 Restore control room boundary to OPERABLE status.	24 hours
C. Required Action and associated Completion Time of Condition A or B not met in MODE 1, 2, or 3.	C.1 Be in MODE 3.	12 hours
	<u>AND</u> C.2 Be in MODE 4.	36 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>D. Required Action and associated Completion Time of Condition A not met during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.</p>	<p>D.1 -----NOTE----- LCO 3.0.3 is not applicable.</p> <hr/> <p>Place OPERABLE CREV subsystem in pressurization mode.</p> <p><u>OR</u></p> <p>D.2.1 Suspend movement of irradiated fuel assemblies in the secondary containment.</p> <p><u>AND</u></p> <p>D.2.2 Suspend CORE ALTERATIONS.</p> <p><u>AND</u></p> <p>D.2.3 Initiate action to suspend OPDRVs.</p>	<p>Immediately</p> <p>Immediately</p> <p>Immediately</p> <p>Immediately</p>
<p>E. Two CREV subsystems inoperable in MODE 1, 2, or 3 for reasons other than Condition B.</p>	<p>E.1 Enter LCO 3.0.3.</p>	<p>Immediately</p>

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>F. Two CREV subsystems inoperable during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.</p>	<p>F.1 NOTE LCO 3.0.3 is not applicable.</p> <p>Suspend movement of irradiated fuel assemblies in the secondary containment.</p>	<p>Immediately</p>
	<p><u>AND</u></p> <p>F.2 Suspend CORE ALTERATIONS.</p>	<p>Immediately</p>
	<p><u>AND</u></p> <p>F.3 Initiate action to suspend OPDRVs.</p>	<p>Immediately</p>

BASES (continued)

LCO

Two redundant subsystems of the CREV System are required to be OPERABLE to ensure that at least one is available, assuming a single failure disables the other subsystem. Total system failure could result in exceeding a dose of 5 rem to the control room operators in the event of a DBA.

The CREV System is considered OPERABLE when the individual components necessary to control operator exposure are OPERABLE in both subsystems. A subsystem is considered OPERABLE when its associated:

- a. Fan is OPERABLE;
- b. HEPA filter and charcoal adsorbers are not excessively restricting flow and are capable of performing their filtration functions; and
- c. The electric duct heater, ductwork, and dampers are OPERABLE.

In addition, the control room boundary must be maintained, including the integrity of the walls, floors, ceilings, ductwork, and access doors.

The LCO is modified by a Note allowing the main control room boundary to be opened intermittently under administrative controls. For entry and exit through doors the administrative control of the 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 main control room. This individual will have a method to rapidly close the opening when a need for main control room isolation is indicated.

(continued)

BASES

ACTIONS
(continued)

B.1

If the main control room boundary is inoperable in MODES 1, 2, and 3, the CREV trains cannot perform their intended functions. Actions must be taken to restore an OPERABLE main control room boundary within 24 hours. During the period that the main control room boundary is inoperable, appropriate compensatory measures (consistent with the intent of GDC 19) should be utilized to protect control room operators from potential hazards such as radioactive contamination, toxic chemicals, smoke, temperature and relative humidity, and physical security. Preplanned measures should be available to address these concerns for intentional and unintentional entry into the condition. The 24 hour Completion Time is reasonable based on the low probability of a DBA occurring during this time period, and the use of compensatory measures. The 24 hour Completion Time is a typically reasonable time to diagnose, plan and possibly repair, and test most problems with the main control room boundary.

C.1 and C.2

In MODE 1, 2, or 3, if the inoperable CREV subsystem or control room boundary cannot be restored to OPERABLE status within the associated Completion Time, the unit must be placed in a MODE that minimizes risk. To achieve this status, the unit must be placed in at least MODE 3 within 12 hours and in MODE 4 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

D.1, D.2.1, D.2.2, and D.2.3

The Required Actions of Condition D are modified by a Note indicating that LCO 3.0.3 does not apply. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is

(continued)

BASES

ACTIONS

D.1, D.2.1, D.2.2, and D.2.3 (continued)

independent of reactor operations. Therefore, inability to suspend movement of irradiated fuel assemblies is not sufficient reason to require a reactor shutdown.

During movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs, if the inoperable CREV subsystem cannot be restored to OPERABLE status within the required Completion Time, the OPERABLE CREV subsystem may be placed in the pressurization mode. This action ensures that the remaining subsystem is OPERABLE, that no failures that would prevent automatic actuation will occur, and that any active failure will be readily detected.

An alternative to Required Action D.1 is to immediately suspend activities that present a potential for releasing radioactivity that might require isolation of the control room. This places the unit in a condition that minimizes risk.

If applicable, CORE ALTERATIONS and movement of irradiated fuel assemblies in the secondary containment must be suspended immediately. Suspension of these activities shall not preclude completion of movement of a component to a safe position. Also, if applicable, actions must be initiated immediately to suspend OPDRVs to minimize the probability of a vessel draindown and the subsequent potential for fission product release. Actions must continue until the OPDRVs are suspended.

(continued)

BASES

ACTIONS
(continued)

E.1

If both CREV subsystems are inoperable in MODE 1, 2, or 3 for reasons other than an inoperable control room boundary (i.e., Condition B), the CREV System may not be capable of performing the intended function and the unit is in a condition outside the accident analyses. Therefore, LCO 3.0.3 must be entered immediately.

F.1, F.2, and F.3

The Required Actions of Condition F are modified by a Note indicating that LCO 3.0.3 does not apply. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, inability to suspend movement of irradiated fuel assemblies is not sufficient reason to require a reactor shutdown.

During movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs, with two CREV subsystems inoperable, action must be taken immediately to suspend activities that present a potential for releasing radioactivity that might require isolation of the control room. This places the unit in a condition that minimizes risk.

If applicable, CORE ALTERATIONS and movement of irradiated fuel assemblies in the secondary containment must be suspended immediately. Suspension of these activities shall not preclude completion of movement of a component to a safe position. If applicable, actions must be initiated immediately to suspend OPDVRs to minimize the probability of a vessel draindown and subsequent potential for fission product release. Actions must continue until the OPDRVs are suspended.

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3.7 PLANT SYSTEMS

3.7.3 Control Room Emergency Ventilation (CREV) System

LCO 3.7.3 Two CREV subsystems shall be OPERABLE.

-----NOTE-----

The main control room boundary may be opened intermittently under administrative control.

APPLICABILITY: MODES 1, 2, and 3,
During movement of irradiated fuel assemblies in the secondary containment,
During CORE ALTERATIONS,
During operations with a potential for draining the reactor vessel (OPDRVs).

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One CREV subsystem inoperable.	A.1 Restore CREV subsystem to OPERABLE status.	7 days
B. Two CREV subsystems inoperable due to inoperable control room boundary in MODES 1, 2, and 3.	B.1 Restore control room boundary to OPERABLE status.	24 hours
C. Required Action and associated Completion Time of Condition A or B not met in MODE 1, 2, or 3.	C.1 Be in MODE 3.	12 hours
	<u>AND</u> C.2 Be in MODE 4.	36 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>D. Required Action and associated Completion Time of Condition A not met during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.</p>	<p>D.1 NOTE LCO 3.0.3 is not applicable.</p> <hr/> <p>Place OPERABLE CREV subsystem in pressurization mode.</p>	<p>Immediately</p>
	<p><u>OR</u></p> <p>D.2.1 Suspend movement of irradiated fuel assemblies in the secondary containment.</p>	<p>Immediately</p>
	<p><u>AND</u></p> <p>D.2.2 Suspend CORE ALTERATIONS.</p>	<p>Immediately</p>
	<p><u>AND</u></p> <p>D.2.3 Initiate action to suspend OPDRVs.</p>	<p>Immediately</p>
<p>E. Two CREV subsystems inoperable in MODE 1, 2, or 3 for reasons other than Condition B.</p>	<p>E.1 Enter LCO 3.0.3.</p>	<p>Immediately</p>

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>F. Two CREV subsystems inoperable during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.</p>	<p>F.1 -----NOTE----- LCO 3.0.3 is not applicable. ----- Suspend movement of irradiated fuel assemblies in the secondary containment.</p>	<p>Immediately</p>
	<p><u>AND</u> F.2 Suspend CORE ALTERATIONS.</p>	<p>Immediately</p>
	<p><u>AND</u> F.3 Initiate action to suspend OPDRVs.</p>	<p>Immediately</p>

BASES (continued)

LCO

Two redundant subsystems of the CREV System are required to be **OPERABLE** to ensure that at least one is available, assuming a single failure disables the other subsystem. Total system failure could result in exceeding a dose of 5 rem to the control room operators in the event of a DBA.

The CREV System is considered **OPERABLE** when the individual components necessary to control operator exposure are **OPERABLE** in both subsystems. A subsystem is considered **OPERABLE** when its associated:

- a. Fan is **OPERABLE**;
- b. HEPA filter and charcoal adsorbers are not excessively restricting flow and are capable of performing their filtration functions; and
- c. The electric duct heater, ductwork, and dampers are **OPERABLE**.

In addition, the control room boundary must be maintained, including the integrity of the walls, floors, ceilings, ductwork, and access doors.

The LCO is modified by a Note allowing the main control room boundary to be opened intermittently under administrative controls. For entry and exit through doors the administrative control of the 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 main control room. This individual will have a method to rapidly close the opening when a need for main control room isolation is indicated.

(continued)

BASES

ACTIONS
(continued)

B.1

If the main control room boundary is inoperable in MODES 1, 2, and 3, the CREV trains cannot perform their intended functions. Actions must be taken to restore an OPERABLE main control room boundary within 24 hours. During the period that the main control room boundary is inoperable, appropriate compensatory measures (consistent with the intent of GDC 19) should be utilized to protect control room operators from potential hazards such as radioactive contamination, toxic chemicals, smoke, temperature and relative humidity, and physical security. Preplanned measures should be available to address these concerns for intentional and unintentional entry into the condition. The 24 hour Completion Time is reasonable based on the low probability of a DBA occurring during this time period, and the use of compensatory measures. The 24 hour Completion Time is a typically reasonable time to diagnose, plan and possibly repair, and test most problems with the main control room boundary.

C.1 and C.2

In MODE 1, 2, or 3, if the inoperable CREV subsystem or control room boundary cannot be restored to OPERABLE status within the associated Completion Time, the unit must be placed in a MODE that minimizes risk. To achieve this status, the unit must be placed in at least MODE 3 within 12 hours and in MODE 4 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

D.1, D.2.1, D.2.2, and D.2.3

The Required Actions of Condition D are modified by a Note indicating that LCO 3.0.3 does not apply. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is

(continued)

BASES

ACTIONS

D.1, D.2.1, D.2.2, and D.2.3 (continued)

independent of reactor operations. Therefore, inability to suspend movement of irradiated fuel assemblies is not sufficient reason to require a reactor shutdown.

During movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs, if the inoperable CREV subsystem cannot be restored to OPERABLE status within the required Completion Time, the OPERABLE CREV subsystem may be placed in the pressurization mode. This action ensures that the remaining subsystem is OPERABLE, that no failures that would prevent automatic actuation will occur, and that any active failure will be readily detected.

An alternative to Required Action D.1 is to immediately suspend activities that present a potential for releasing radioactivity that might require isolation of the control room. This places the unit in a condition that minimizes risk.

If applicable, CORE ALTERATIONS and movement of irradiated fuel assemblies in the secondary containment must be suspended immediately. Suspension of these activities shall not preclude completion of movement of a component to a safe position. Also, if applicable, actions must be initiated immediately to suspend OPDRVs to minimize the probability of a vessel draindown and the subsequent potential for fission product release. Actions must continue until the OPDRVs are suspended.

(continued)

BASES

ACTIONS
(continued)

E.1

If both CREV subsystems are inoperable in MODE 1, 2, or 3 for reasons other than an inoperable control room boundary (i.e., Condition B), the CREV System may not be capable of performing the intended function and the unit is in a condition outside the accident analyses. Therefore, LCO 3.0.3 must be entered immediately.

F.1, F.2, and F.3

The Required Actions of Condition F are modified by a Note indicating that LCO 3.0.3 does not apply. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, inability to suspend movement of irradiated fuel assemblies is not sufficient reason to require a reactor shutdown.

During movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs, with two CREV subsystems inoperable, action must be taken immediately to suspend activities that present a potential for releasing radioactivity that might require isolation of the control room. This places the unit in a condition that minimizes risk.

If applicable, CORE ALTERATIONS and movement of irradiated fuel assemblies in the secondary containment must be suspended immediately. Suspension of these activities shall not preclude completion of movement of a component to a safe position. If applicable, actions must be initiated immediately to suspend OPDVRs to minimize the probability of a vessel draindown and subsequent potential for fission product release. Actions must continue until the OPDRVs are suspended.

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3.7 PLANT SYSTEMS

3.7.3 Control Room Emergency Ventilation (CREV) System

LCO 3.7.3 Two CREV subsystems shall be OPERABLE.

-----NOTE-----

The main control room boundary may be opened intermittently under administrative control.

APPLICABILITY: MODES 1, 2, and 3,
During movement of irradiated fuel assemblies in the secondary containment,
During CORE ALTERATIONS,
During operations with a potential for draining the reactor vessel (OPDRVs).

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One CREV subsystem inoperable.	A.1 Restore CREV subsystem to OPERABLE status.	7 days
B. Two CREV subsystems inoperable due to inoperable control room boundary in MODES 1, 2, and 3.	B.1 Restore control room boundary to OPERABLE status.	24 hours
C. Required Action and associated Completion Time of Condition A or B not met in MODE 1, 2, or 3.	C.1 Be in MODE 3.	12 hours
	<u>AND</u> C.2 Be in MODE 4.	36 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>D. Required Action and associated Completion Time of Condition A not met during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.</p>	<p>D.1 NOTE LCO 3.0.3 is not applicable.</p> <p>Place OPERABLE CREV subsystem in pressurization mode.</p> <p><u>OR</u></p> <p>D.2.1 Suspend movement of irradiated fuel assemblies in the secondary containment.</p> <p><u>AND</u></p> <p>D.2.2 Suspend CORE ALTERATIONS.</p> <p><u>AND</u></p> <p>D.2.3 Initiate action to suspend OPDRVs.</p>	<p>Immediately</p> <p>Immediately</p> <p>Immediately</p> <p>Immediately</p>
<p>E. Two CREV subsystems inoperable in MODE 1, 2, or 3 for reasons other than Condition B.</p>	<p>E.1 Enter LCO 3.0.3.</p>	<p>Immediately</p>

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>F. Two CREV subsystems inoperable during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.</p>	<p>F.1 -----NOTE----- LCO 3.0.3 is not applicable. -----</p> <p>Suspend movement of irradiated fuel assemblies in the secondary containment.</p>	<p>Immediately</p>
	<p><u>AND</u></p> <p>F.2 Suspend CORE ALTERATIONS.</p>	<p>Immediately</p>
	<p><u>AND</u></p> <p>F.3 Initiate action to suspend OPDRVs.</p>	<p>Immediately</p>

BASES (continued)

LCO

Two redundant subsystems of the CREV System are required to be OPERABLE to ensure that at least one is available, assuming a single failure disables the other subsystem. Total system failure could result in exceeding a dose of 5 rem to the control room operators in the event of a DBA.

The CREV System is considered OPERABLE when the individual components necessary to control operator exposure are OPERABLE in both subsystems. A subsystem is considered OPERABLE when its associated:

- a. Fan is OPERABLE;
- b. HEPA filter and charcoal adsorbers are not excessively restricting flow and are capable of performing their filtration functions; and
- c. The electric duct heater, ductwork, and dampers are OPERABLE.

In addition, the control room boundary must be maintained, including the integrity of the walls, floors, ceilings, ductwork, and access doors.

The LCO is modified by a Note allowing the main control room boundary to be opened intermittently under administrative controls. For entry and exit through doors the administrative control of the 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 main control room. This individual will have a method to rapidly close the opening when a need for main control room isolation is indicated.

(continued)

BASES

ACTIONS
(continued)

B.1

If the main control room boundary is inoperable in MODES 1, 2, and 3, the CREV trains cannot perform their intended functions. Actions must be taken to restore an OPERABLE main control room boundary within 24 hours. During the period that the main control room boundary is inoperable, appropriate compensatory measures (consistent with the intent of GDC 19) should be utilized to protect control room operators from potential hazards such as radioactive contamination, toxic chemicals, smoke, temperature and relative humidity, and physical security. Preplanned measures should be available to address these concerns for intentional and unintentional entry into the condition. The 24 hour Completion Time is reasonable based on the low probability of a DBA occurring during this time period, and the use of compensatory measures. The 24 hour Completion Time is a typically reasonable time to diagnose, plan and possibly repair, and test most problems with the main control room boundary.

C.1 and C.2

In MODE 1, 2, or 3, if the inoperable CREV subsystem or control room boundary cannot be restored to OPERABLE status within the associated Completion Time, the unit must be placed in a MODE that minimizes risk. To achieve this status, the unit must be placed in at least MODE 3 within 12 hours and in MODE 4 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

D.1, D.2.1, D.2.2, and D.2.3

The Required Actions of Condition D are modified by a Note indicating that LCO 3.0.3 does not apply. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is

(continued)

BASES

ACTIONS

D.1, D.2.1, D.2.2, and D.2.3 (continued)

independent of reactor operations. Therefore, inability to suspend movement of irradiated fuel assemblies is not sufficient reason to require a reactor shutdown.

During movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs, if the inoperable CREV subsystem cannot be restored to OPERABLE status within the required Completion Time, the OPERABLE CREV subsystem may be placed in the pressurization mode. This action ensures that the remaining subsystem is OPERABLE, that no failures that would prevent automatic actuation will occur, and that any active failure will be readily detected.

An alternative to Required Action D.1 is to immediately suspend activities that present a potential for releasing radioactivity that might require isolation of the control room. This places the unit in a condition that minimizes risk.

If applicable, CORE ALTERATIONS and movement of irradiated fuel assemblies in the secondary containment must be suspended immediately. Suspension of these activities shall not preclude completion of movement of a component to a safe position. Also, if applicable, actions must be initiated immediately to suspend OPDRVs to minimize the probability of a vessel draindown and the subsequent potential for fission product release. Actions must continue until the OPDRVs are suspended.

(continued)

BASES

ACTIONS
(continued)

E.1

If both CREV subsystems are inoperable in MODE 1, 2, or 3 for reasons other than an inoperable control room boundary (i.e., Condition B), the CREV System may not be capable of performing the intended function and the unit is in a condition outside the accident analyses. Therefore, LCO 3.0.3 must be entered immediately.

F.1, F.2, and F.3

The Required Actions of Condition F are modified by a Note indicating that LCO 3.0.3 does not apply. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, inability to suspend movement of irradiated fuel assemblies is not sufficient reason to require a reactor shutdown.

During movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs, with two CREV subsystems inoperable, action must be taken immediately to suspend activities that present a potential for releasing radioactivity that might require isolation of the control room. This places the unit in a condition that minimizes risk.

If applicable, CORE ALTERATIONS and movement of irradiated fuel assemblies in the secondary containment must be suspended immediately. Suspension of these activities shall not preclude completion of movement of a component to a safe position. If applicable, actions must be initiated immediately to suspend OPDVRs to minimize the probability of a vessel draindown and subsequent potential for fission product release. Actions must continue until the OPDRVs are suspended.

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