

## INDEX

### DEFINITIONS

<u>SECTION</u>	<u>PAGE</u>
<b>1.0 DEFINITIONS</b>	
1.1 ACTION . . . . .	1-1
1.2 ACTUATION LOGIC TEST . . . . .	1-1
1.3 ANALOG CHANNEL OPERATIONAL TEST . . . . .	1-1
1.4 AXIAL FLUX DIFFERENCE . . . . .	1-1
1.5 CHANNEL CALIBRATION . . . . .	1-1
1.6 CHANNEL CHECK . . . . .	1-1
1.7 CONTAINMENT INTEGRITY . . . . .	1-2
1.8 CONTROLLED LEAKAGE . . . . .	1-2
1.9 CORE ALTERATIONS . . . . .	1-2
1.10 DOSE EQUIVALENT I-131 . . . . .	1-2
1.11 E-AVERAGE DISINTEGRATION ENERGY . . . . .	1-3
1.12 DELETED	
1.13 ENGINEERED SAFETY FEATURES RESPONSE TIME . . . . .	1-3
1.14 DELETED	
1.15 FREQUENCY NOTATION . . . . .	1-3
1.16 IDENTIFIED LEAKAGE . . . . .	1-3
1.17 MASTER RELAY TEST . . . . .	1-3
1.18 MEMBER(S) OF THE PUBLIC . . . . .	1-4
1.19 OPERABLE - OPERABILITY . . . . .	1-4
1.20 OPERATIONAL MODE - MODE . . . . .	1-4
1.21 PHYSICS TESTS . . . . .	1-4
1.22 PRESSURE BOUNDARY LEAKAGE . . . . .	1-4
1.23 PURGE - PURGING . . . . .	1-4
1.24 QUADRANT POWER TILT RATIO . . . . .	1-5
1.25 DELETED	
1.26 DELETED	
1.27 RATED THERMAL POWER . . . . .	1-5
1.28 REACTOR TRIP SYSTEM RESPONSE TIME . . . . .	1-5
1.29 REPORTABLE EVENT . . . . .	1-5
1.30 SHUTDOWN MARGIN . . . . .	1-5
1.31 SITE BOUNDARY . . . . .	1-5

## INDEX

### BASES

---

<u>SECTION</u>	<u>PAGE</u>
TABLE B 3/4.4-1 REACTOR VESSEL FRACTURE TOUGHNESS PROPERTIES . . .	B 3/4 4-9
FIGURE B 3/4.4-1 FAST NEUTRON FLUENCE ( $E > 1\text{MeV}$ ) AS A FUNCTION OF FULL POWER SERVICE LIFE . . . . .	B 3/4 4-10
3/4.4.10 DELETED . . . . .	B 3/4 4-15
3/4.4.11 DELETED . . . . .	B 3/4 4-15

### 3/4.5 EMERGENCY CORE COOLING SYSTEMS

3/4.5.1 ACCUMULATORS . . . . .	B 3/4 5-1
3/4.5.2 and 3/4.5.3 ECCS SUBSYSTEMS . . . . .	B 3/4 5-1
3/4.5.4 REFUELING WATER STORAGE TANK . . . . .	B 3/4 5-2
3/4.5.5 pH TRISODIUM PHOSPHATE STORAGE BASKETS . . . . .	B 3/4 5-3

### 3/4.6 CONTAINMENT SYSTEMS

3/4.6.1 PRIMARY CONTAINMENT . . . . .	B 3/4 6-1
3/4.6.2 DEPRESSURIZATION AND COOLING SYSTEMS . . . . .	B 3/4 6-2
3/4.6.3 CONTAINMENT ISOLATION VALVES . . . . .	B 3/4 6-3
3/4.6.4 COMBUSTIBLE GAS CONTROL . . . . .	B 3/4 6-3a
3/4.6.5 SUBATMOSPHERIC PRESSURE CONTROL SYSTEM . . . . .	B 3/4 6-3d
3/4.6.6 SECONDARY CONTAINMENT . . . . .	B 3/4 6-4

### 3/4.7 PLANT SYSTEMS

3/4.7.1 TURBINE CYCLE . . . . .	B 3/4 7-1
3/4.7.2 DELETED . . . . .	B 3/4 7-7
3/4.7.3 REACTOR PLANT COMPONENT COOLING WATER SYSTEM . . . . .	B 3/4 7-7
3/4.7.4 SERVICE WATER SYSTEM . . . . .	B 3/4 7-7
3/4.7.5 ULTIMATE HEAT SINK . . . . .	B 3/4 7-8
3/4.7.6 DELETED . . . . .	B 3/4 7-10
3/4.7.7 CONTROL ROOM EMERGENCY VENTILATION SYSTEM . . . . .	B 3/4 7-10
3/4.7.8 CONTROL ROOM ENVELOPE PRESSURIZATION SYSTEM . . . . .	B 3/4 7-17
3/4.7.9 AUXILIARY BUILDING FILTER SYSTEM . . . . .	B 3/4 7-23
3/4.7.10 SNUBBERS . . . . .	B 3/4 7-23

## DEFINITIONS

### CONTAINMENT INTEGRITY

1.7 CONTAINMENT INTEGRITY shall exist when:

- a. All penetrations required to be closed during accident conditions are either:
  - 1) Capable of being closed by an OPERABLE containment automatic isolation valve system\*, or
  - 2) Closed by manual valves, blind flanges, or deactivated automatic valves secured in their closed positions, except for valves that are opened under administrative control as permitted by Specification 3.6.3.
- b. All equipment hatches are closed and sealed,
- c. Each air lock is in compliance with the requirements of Specification 3.6.1.3,
- d. The containment leakage rates are within the limits of the Containment Leakage Rate Testing Program, and
- e. The sealing mechanism associated with each penetration (e.g., welds, bellows, or O-rings) is OPERABLE.

### CONTROLLED LEAKAGE

1.8 CONTROLLED LEAKAGE shall be that seal water flow supplied to the reactor coolant pump seals.

### CORE ALTERATIONS

1.9 CORE ALTERATIONS shall be the movement of any fuel, sources, reactivity control components, or other components affecting reactivity within the reactor vessel with the vessel head removed and fuel in the vessel. Suspension of CORE ALTERATIONS shall not preclude completion of movement of a component to a safe position.

### DOSE EQUIVALENT I-131

1.10 DOSE EQUIVALENT I-131 shall be that concentration of I-131 (microCurie/gram) which alone would produce the same thyroid dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134, and I-135 actually present. The thyroid dose conversion factors used for this calculation shall be those listed in NRC Regulatory Guide 1.109, Revision 1, "Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I."

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

## DEFINITIONS

### $\bar{E}$ - AVERAGE DISINTEGRATION ENERGY

1.11  $\bar{E}$  shall be the average (weighted in proportion to the concentration of each radionuclide in the sample) of the sum of the average beta and gamma energies per disintegration (MeV/d) for the radionuclides in the sample.

1.12 DELETED

### ENGINEERED SAFETY FEATURES RESPONSE TIME

1.13 The ENGINEERED SAFETY FEATURES (ESF) RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its ESF Actuation Setpoint at the channel sensor until the ESF equipment is capable of performing its safety function (i.e., the valves travel to their required positions, pump discharge pressures reach their required values, etc.). Times shall include diesel generator starting and sequence loading delays where applicable. The response time may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured. In lieu of measurement, response time may be verified for selected components provided that the components and the methodology for verification have been previously reviewed and approved by the NRC.

1.14 Deleted

### FREQUENCY NOTATION

1.15 The FREQUENCY NOTATION specified for the performance of Surveillance Requirements shall correspond to the intervals defined in Table 1.1.

### IDENTIFIED LEAKAGE

1.1 IDENTIFIED LEAKAGE shall be:

- a. Leakage (except CONTROLLED LEAKAGE) into closed systems, such as pump seal or valve packing leaks that are captured and conducted to a sump or collecting tank, or
- b. Leakage into the containment atmosphere from sources that are both specifically located and known either not to interfere with the operation of Leakage Detection Systems or not to be PRESSURE BOUNDARY LEAKAGE, or
- c. Reactor Coolant System leakage through a steam generator to the Secondary Coolant System.

### MASTER RELAY TEST

1.17 A MASTER RELAY TEST shall be the energization of each master relay and verification of OPERABILITY of each relay. The MASTER RELAY TEST shall include continuity check of each associated slave relay.

### 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 1 hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

##### SURVEILLANCE REQUIREMENTS

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4.6.1.1 Primary CONTAINMENT INTEGRITY shall be demonstrated:

- a. At least once per 31 days by verifying that all penetrations<sup>(1)</sup> not capable of being closed by OPERABLE containment automatic isolation valves,<sup>(2)</sup> and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in their positions,<sup>(3)</sup> except for valves that are open under administrative control as permitted by Specification 3.6.3; and
- b. By verifying that each containment air lock is in compliance with the requirements of Specification 3.6.1.3.
- c. Deleted

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(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 during each COLD SHUTDOWN except that such verification need not be performed more often than once per 92 days.

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

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

## CONTAINMENT SYSTEMS

### 3/4.6.3 CONTAINMENT ISOLATION VALVES

#### LIMITING CONDITION FOR OPERATION

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3.6.3 The containment isolation valves shall be OPERABLE.<sup>(1) (2)</sup>

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

With one or more of the isolation valve(s) inoperable, maintain at least one isolation barrier OPERABLE in the affected penetration(s), and:

- 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 deactivated automatic valve(s) secured in the isolation position(s), or
- c. Isolate the affected penetration(s) within 4 hours by use of 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 at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

#### SURVEILLANCE REQUIREMENTS

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##### 4.6.3.1 DELETED

4.6.3.2 Each isolation valve shall be demonstrated OPERABLE during the COLD SHUTDOWN or REFUELING MODE at least once per 24 months by:

- a. Verifying that on a Phase "A" Isolation test signal, each Phase "A" isolation valve actuates to its isolation position,
- b. Verifying that on a Phase "B" Isolation test signal, each Phase "B" isolation valve actuates to its isolation position, and
- c. Verifying that on a Containment High Radiation test signal, each purge supply and exhaust isolation valve actuates to its isolation position.

4.6.3.3 The isolation time of each power-operated or automatic valve shall be determined to be within its limit when tested pursuant to Specification 4.0.5.

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<sup>(1)</sup> The provisions of this Specification 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.

<sup>(2)</sup> Containment isolation valves may be opened on an intermittent basis under administrative controls.

### 3/4.6 CONTAINMENT SYSTEMS

#### BASES

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#### 3/4.6.1 PRIMARY CONTAINMENT

##### 3/4.6.1.1 CONTAINMENT INTEGRITY

Primary CONTAINMENT INTEGRITY ensures that the release of radioactive materials from the containment atmosphere will be restricted to those leakage paths and associated leak rates assumed in the safety analyses. This restriction, in conjunction with the leakage rate limitation, will limit the SITE BOUNDARY radiation doses to within the dose guidelines of 10 CFR Part 100 during accident conditions and the control room operators dose to within the guidelines of GDC 19.

Primary CONTAINMENT INTEGRITY is required in MODES 1 through 4. This requires an OPERABLE containment automatic isolation valve system. In MODES 1, 2 and 3 this is satisfied by the automatic containment isolation signals generated by high containment pressure, low pressurizer pressure and low steamline pressure. In MODE 4 the automatic containment isolation signals generated by high containment pressure, low pressurizer pressure and low steamline pressure are not required to be OPERABLE. Automatic actuation of the containment isolation system in MODE 4 is not required because adequate time is available for plant operators to evaluate plant conditions and respond by manually operating engineered safety features components. Automatic actuation logic and actuation relays must be OPERABLE in MODE 4 to support system level manual initiation. Since the manual actuation pushbuttons portion of the containment isolation system is required to be OPERABLE in MODE 4, the plant operators can use the manual pushbuttons to rapidly position all automatic containment isolation valves to the required accident position. Therefore, the containment isolation actuation pushbuttons satisfy the requirement for an OPERABLE containment automatic isolation valve system in MODE 4.

##### 3/4.6.1.2 CONTAINMENT LEAKAGE

The limitations on containment leakage rates, as specified in the Containment Leakage Rate Testing Program, ensure that the total containment leakage volume will not exceed the value assumed in the safety analyses at the peak accident pressure,  $P_a$ . As an added conservatism, the measured overall integrated leakage rate is further limited to less than 0.75  $L_a$  during performance of the periodic test to account for possible degradation of the containment leakage barriers between leakage tests.

The Limiting Condition for Operation defines the limitations on containment leakage. The leakage rates are verified by surveillance testing, as specified in the Containment Leakage Rate Testing Program, in accordance with the requirements of Appendix J. Although the LCO specifies the leakage rates at accident pressure,  $P_a$ , it is not feasible to perform a test at such an exact value for pressure. Consequently, the surveillance testing is performed at a pressure greater than or equal to  $P_a$  to account for test instrument uncertainties and stabilization changes. This conservative test pressure ensures that the measured leakage rates

## CONTAINMENT SYSTEMS

### BASES

#### 3/4.6.3 CONTAINMENT ISOLATION VALVES

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 and is consistent with the requirements of General Design Criteria 54 through 57 of Appendix A to 10 CFR Part 50. Containment isolation within the time limits specified for these isolation valves designed to close automatically ensures that the release of radioactive material to the environment will be consistent with the assumptions used in the analyses for a LOCA. FSAR Table 6.2-65 lists all containment isolation valves. The addition or deletion of any containment isolation valve shall be made in accordance with Section 50.59 of 10CFR50 and approved by the committee(s) as described in the QAP Topical Report.

For the purposes of meeting this LCO, the safety function of the containment isolation valves is to shut within the time limits assumed in the accident analyses. As long as the valves can shut within the time limits assumed in the accident analyses, the valves are OPERABLE. Where the valve position indication does not affect the operation of the valve, the indication is not required for valve operability under this LCO. Position indication for containment isolation valves is covered by Technical Specification 6.8.4.e., Accident Monitoring Instrumentation. Failed position indication on these valves must be restored "as soon as practicable" as required by Technical Specification 6.8.4.e.3. Maintaining the valves OPERABLE, when position indication fails, facilitates troubleshooting and correction of the failure, allowing the indication to be restored "as soon as practicable."

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 deactivated automatic valve, a closed manual valve, and a blind flange. A check valve may not be used to isolate the affected penetration.

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.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.d are included in FSAR Table 6.2-65, and are the isolation valves for those penetrations credited as General Design Criteria 57. The specified time (i.e., 72 hours) of Technical Specification ACTION 3.6.3.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.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.



## CONTAINMENT SYSTEMS

### BASES

#### 3/4.6.3 CONTAINMENT ISOLATION VALVES (Continued)

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.

The opening of containment isolation valves on an intermittent basis under administrative controls 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 valves and that this action will prevent the release of radioactivity outside the containment.

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 or 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.

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. The determination of the appropriate administrative controls for containment isolation valves requires an evaluation of the expected environmental conditions. This evaluation must conclude 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.

When the Residual Heat Removal (RHR) System is placed in service in the plant cooldown mode of operation, the RHR suction isolation remotely operated valves 3RHS\*MV8701A and 3RHS\*MV8701B, and/or 3RHS\*MV8702A and 3RHS\*MV8702B are opened. These valves are normally operated from the control room. They do not receive an automatic containment isolation closure signal, but are interlocked to prevent their opening if Reactor Coolant System (RCS) pressure is greater than approximately 412.5 psia. When any of these valves are opened, either one of the two required licensed (Reactor Operator) control room operators can be credited as the operator required for administrative control. It is not necessary to use a separate dedicated operator.

#### 3/4.6.4 COMBUSTIBLE GAS CONTROL

Hydrogen Monitors are provided to detect high hydrogen concentration conditions that represent a potential for containment breach from a hydrogen explosion. Containment hydrogen concentration is also important in verifying the adequacy of mitigating actions. The requirement to perform a hydrogen sensor calibration at least every 92 days is based upon vendor recommendations to maintain sensor calibration. This calibration consists of a two point calibration, utilizing gas containing approximately one percent hydrogen gas for one of the calibration points, and gas containing approximately four percent hydrogen gas for the other calibration point.

## CONTAINMENT SYSTEMS

### BASES

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#### 3/4.6.4 COMBUSTIBLE GAS CONTROL (Continued)

The OPERABILITY of the equipment and systems required for the detection and control of hydrogen gas ensures that this equipment will be available to maintain the hydrogen concentration within containment below its flammable limit during post-LOCA conditions. Either recombiner unit or the Mechanical Vacuum Pumps are capable of controlling the expected hydrogen generation associated with: (1) zirconium-water reactions, (2) radiolytic decomposition of water, and (3) corrosion of metals within containment. These Hydrogen Control Systems are consistent with the recommendations of Regulatory Guide 1.7, "Control of Combustible Gas Concentrations in Containment Following a LOCA," March 1971.

The Post-LOCA performance of the hydrogen recombiner blowers is based on a series of equations supplied by the blower manufacturer. These equations are also the basis of the acceptance criteria used in the surveillance procedure. The required performance was based on starting containment conditions before the LOCA of 10.59 psia (total pressure), 120°F and 100% relative humidity.

The surveillance procedure shall use the following methods to verify acceptable blower flow rate:

1. Definitions and constants

CFM = cubic feet per minute

RPM = revolutions per minute

Blower RPM = 3550

Blower  $\text{ft}^3/\text{revolution} = .028 \text{ ft}^3$

Standard CFM = gas volume converted to conditions of 68°F and 14.7 psia.

2. Measure and record the following information:

P<sub>containment</sub>--Average of 3LMS\*P934, 935, 936, and 937 (psia)

P<sub>out</sub>--From 3HCS\*PI1A or B (psia)

T<sub>c</sub>--Containment temperature (°F)

P<sub>in</sub>--Measure with a new inlet gauge or calculate from Equation 3a below (psia)

scfm measured--See Procedure/Form 3613A.3-1

$\Delta P_i$ --From Table 2 (psi)

A--As found Slip Constant

Accuracy--Instrument accuracy range from Table 1.

## CONTAINMENT SYSTEMS

### BASES

#### 3/4.6.4 COMBUSTIBLE GAS CONTROL (Continued)

3. Calculate as found slip constant (A)

a.  $P_{in} = P_{containment} - \Delta P_f$

b.

$$A = \frac{3550 - \left( \left[ \frac{\text{scfm} - \text{Accuracy}_{\text{measured}}}{0.028 * 0.95} \right] * \left[ \frac{14.7 * T_c + 460}{P_{in} * 528} \right] \right)}{\left( \left[ \frac{P_{out}}{P_{in}} * 14.7 \right] - 14.7 \right)^{\frac{1}{2}} * \left( \frac{14.7 * T_c + 460}{P_{in} * 528} \right)^{\frac{1}{2}}}$$

4. Calculate expected postaccident flow rate using A calculated in Step 3.

a. Slip RPM

$$= A * (4.937)^{\frac{1}{2}} * 1.218$$

b. Actual Inlet CFM

$$ACFM = .028 (3550 - \text{Slip RPM})$$

c. Standard CFM

$$\text{scfm} = ACFM * 0.725$$

d. Postaccident scfm Minimum =  $\text{scfm} * 0.95$

e. Acceptance Flow Rate

$$\text{Postaccident scfm minimum} \geq 41.52 \text{ scfm.}$$

Table 1 Accuracy Range (Ref. 2)

<u>scfm (measured)</u>	<u>Accuracy Range</u>
30 to < 40	9.13 scfm
40 to < 50	6.98 scfm
50 to < 60	5.81 scfm
60 to < 90	5.17 scfm

Table 2 Inlet Piping Loss (Ref. 1)

<u>scfm Measured (Unadjusted)</u>	<u><math>\Delta P_f</math> (psi)</u>
30	.21
40	.31
50	.52
60	.73
70	.98
80	1.28

## CONTAINMENT SYSTEMS

### BASES

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#### 3/4.6.4 COMBUSTIBLE GAS CONTROL (Continued)

- References:
1. Calculation 90-RPS-722GM, "Flow Acceptance Criteria for 3HCS\*RBNR 1A/B Blowers 3HCS\*C1A/B."
  2. Calculation PA 90-LOE-0132GE, "Hydrogen Recombiner Flow Error Analysis."

The acceptance flow rate is the required flow rate at the worst case containment conditions 24 hours after the LOCA. The analysis assumes the recombiners are started no later than 24 hours after the accident. The 18-month surveillance shall verify the gas temperature and blower flow rate concurrently.

#### 3/4.6.5 SUBATMOSPHERIC PRESSURE CONTROL SYSTEM

##### 3/4.6.5.1 STEAM JET AIR EJECTOR

The closure of the isolation valves in the suction of the steam jet air ejector ensures that: (1) the containment internal pressure may be maintained within its operation limits by the mechanical vacuum pumps, and (2) the containment atmosphere is isolated from the outside environment in the event of a LOCA. These valves are required to be closed for containment isolation.