

Industry/TSTF Standard Technical Specification Change Traveler

Containment Personnel Airlock Doors Open During Fuel Movement

Classification: 5) Plant Variation

NUREGs Affected: 1430 1431 1432 1433 1434

Description:

This change incorporates into the ITS NUREGs a change accepted for current Tech Specs. It allows the containment personnel airlock doors to remain open during fuel movement.

This change was based primarily on the license amendment granted to Arkansas Nuclear One, Unit 2 on September 28, 1995 (Letter from George Kalman, NRC, to Mr. Jerry W. Yelverton, ANO, Issuance of Amendment No. 166 to Facility Operating License No. NPF-6 - Arkansas Nuclear One, Unit No. 2 (TAC NO. M92150)).

Justification:

This change incorporates into the ITS NUREGs the option to allow both containment personnel airlock doors to remain open during fuel movement. This option has been granted to many plants starting with the August 31, 1994 approval of an amendment to the Calvert Cliffs Nuclear Power Plant Technical Specifications.

The Reviewer's Note states the requirements for using this option.

Rev. 1 - The NRC has asked for information on whether or not this change should be reviewed in conjunction with TSTF-51.

This Traveler should not be reviewed in conjunction with TSTF-51. TSTF-51 proposed new and unique regulatory questions based on the assumed use of Standard Review Plan fuel handling accident calculations. TSTF-68 implements an approved license amendment which has been adopted by over a dozen sites. It poses no new regulatory questions. Adoption of TSTF-68 requires NRC approval of the plant-specific fuel handling accident calculations and makes no assumption regarding the acceptability of the generic SRP. More importantly, licensee's license amendment requests and the NRC's approved current Technical Specifications vary from plant to plant. Therefore, if no standard presentation is given in the ISTS, the resulting plant-specific ITS implementations will also vary. This will undermine the NRC's goal of standardizing the ITS.

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NRC Contact: None Assigned

Revision History

OG Revision 0

Revision Status: Closed

Revision Proposed by: Calvert Cliffs

Revision Description:

Original Issue

Owners Group Review Information

Date Originated by OG: 23-Jan-96

Owners Group Comments

Proposed Calvert Cliffs model. Accepted suggestion to use Arkansas Nuclear One model.

Owners Group Resolution: Approved Date: 23-Jan-96

TSTF Review Information

7/16/99

OG Revision 0**Revision Status: Closed**

TSTF Received Date: 05-Mar-96 Date Distributed for Review 07-Mar-96

OG Review Completed: BWOG WOG CEOG BWROG

TSTF Comments:

Suggested revision to reflect most recent license amendments approved by the NRC. Accepted and revised.

TSTF Resolution: Approved Date: 16-Apr-96

NRC Review Information

NRC Received Date: 12-Jun-96

NRC Comments:

9/18/96 - Review Pending

10/30/96 - Industry to provide white paper on why TSTF-68 should be pursued separately from TSTF-51. Lacking justification, TSTF-68 will be reviewed with TSTF-51.

11/17/96 - Justification included in the Justification section. Provided to the TSTF for review.

1/17/97 - Revision forwarded to the NRC.

Final Resolution: Superseded by Revision

Final Resolution Date: 17-Jan-97

TSTF Revision 1**Revision Status: Closed**

Revision Proposed by: CEOG

Revision Description:

Eliminate the reference to "a minimum of" one door in each airlock [is capable of being] closed. LCOs always specify minimums.

TSTF Review Information

TSTF Received Date: 24-Oct-96 Date Distributed for Review 20-Nov-96

OG Review Completed: BWOG WOG CEOG BWROG

TSTF Comments:

(No Comments)

TSTF Resolution: Approved Date: 19-Dec-96

NRC Review Information

NRC Received Date: 17-Jan-97

NRC Comments:

10/2/97 - In RSB review.

6/16/99 - In Tech Branch review

7/17/99 - NRC provided a revised Reviewer's Note.

Final Resolution: Superseded by Revision

Final Resolution Date: 17-Jul-99

TSTF Revision 2**Revision Status: Active****Next Action: NRC**

Revision Proposed by: NRC

7/16/99

TSTF Revision 2**Revision Status: Active****Next Action: NRC****Revision Description:**

Revised the Insert 1 Reviewer's Note based on NRC comments and to make TSTF-68 and TSTF-312 consistent.

TSTF Review Information

TSTF Received Date: 17-Jul-99 Date Distributed for Review 17-Jul-99

OG Review Completed: BWOG WOG CEOG BWROG

TSTF Comments:

(No Comments)

TSTF Resolution: Approved Date: 17-Jul-99

Incorporation Into the NUREGs

File to BBS/LAN Date:

TSTF Informed Date:

TSTF Approved Date:

NUREG Rev Incorporated:

Affected Technical Specifications

Bkgnd 3.9.3 Bases	Containment Penetrations	NUREG(s)- 1430 1432 Only
LCO 3.9.3	Containment Penetrations	NUREG(s)- 1430 1432 Only
LCO 3.9.3 Bases	Containment Penetrations	NUREG(s)- 1430 1432 Only
SR 3.9.3.1 Bases	Containment Penetrations	NUREG(s)- 1430 1432 Only
Bkgnd 3.9.4 Bases	Containment Penetrations	NUREG(s)- 1431 Only
LCO 3.9.4	Containment Penetrations	NUREG(s)- 1431 Only
LCO 3.9.4 Bases	Containment Penetrations	NUREG(s)- 1431 Only
SR 3.9.4.1 Bases	Containment Penetrations	NUREG(s)- 1431 Only

7/16/99

INSERT 1

----- REVIEWERS NOTE -----

The allowance to have containment personnel airlock doors open and penetration 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 of a fuel handling accident 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 (even though the containment fission product control function is not required to meet acceptable dose consequences) that the open airlock can and will be promptly closed following containment evacuation and that 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.

INSERT 2

The containment personnel airlock doors may be open during movement of irradiated fuel in the containment and during CORE ALTERATIONS provided that one door is capable of being closed in the event of a fuel handling accident. Should a fuel handling accident occur inside containment, one personnel airlock door will be closed following an evacuation of containment.

INSERT 3

in excess of those recommended by Standard Review Plan Section 15.7.4
(Reference 3.)

3.9 REFUELING OPERATIONS

3.9.3 Containment Penetrations

LCO 3.9.3 The containment penetrations shall be in the following status:

- a. The equipment hatch closed and held in place by four bolts;
- b. One door in each air lock closed; and
- c. Each penetration providing direct access from the containment atmosphere to the outside atmosphere either:
 - 1. closed by a manual or automatic isolation valve, blind flange, or equivalent, or
 - 2. capable of being closed by an OPERABLE Containment Purge and Exhaust Isolation System.

[is capable of being]

APPLICABILITY: During CORE ALTERATIONS,
During movement of irradiated fuel assemblies within containment.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more containment penetrations not in required status.	A.1 Suspend CORE ALTERATIONS.	Immediately
	<u>AND</u> A.2 Suspend movement of irradiated fuel assemblies within containment.	Immediately

BASES

BACKGROUND
(continued)

when containment closure is not required, the door interlock mechanism may be disabled, allowing both doors of an air lock to remain open for extended periods when frequent containment entry is necessary. During CORE ALTERATIONS or movement of irradiated fuel assemblies within containment, containment closure is required; therefore, the door interlock mechanism may remain disabled, but one air lock door must always remain closed. *[Capable of being]*

The requirements on containment penetration closure ensure that a release of fission product radioactivity within containment will be restricted from escaping to the environment. *The closure restrictions are sufficient to restrict fission product radioactivity release from containment due to a fuel handling accident during refueling.* *to within regulatory limits.*

The Containment Purge and Exhaust System includes two subsystems. The normal subsystem includes a [42] inch purge penetration and a [42] inch exhaust penetration. The second subsystem, or minipurge system, includes an [8] inch purge penetration and an [8] inch exhaust penetration. During MODES 1, 2, 3, and 4, the two valves in each of the normal purge and exhaust penetrations are secured in the closed position. The two valves in each of the two minipurge penetrations can be opened intermittently but are closed automatically by the Engineered Safety Feature Actuation System (ESFAS). Neither of the subsystems is subject to a Specification in MODE 5.

In MODE 6, large air exchangers are necessary to conduct refueling operations. The normal [42] inch purge system is used for this purpose, and all four valves are closed on a reactor building (RB) high radiation signal in accordance with LCO 3.3.15, "Reactor Building (RB) Purge Isolation" High Radiation.

The other containment penetrations that provide direct access from containment atmosphere to outside atmosphere must be isolated on at least one side. Isolation may be achieved by an OPERABLE automatic isolation valve or by a manual isolation valve, blind flange, or equivalent. Equivalent isolation methods must be approved and may include use of a material that can provide a temporary, atmospheric pressure ventilation barrier for the other containment penetrations during fuel movements (Ref. 1).

(continued)

TSTF-68, Rev. 2

BASES (continued)

APPLICABLE
SAFETY ANALYSES

During CORE ALTERATIONS or movement of fuel assemblies within containment with irradiated fuel in containment, the most severe radiological consequences result from a fuel handling accident. The fuel handling accident is a postulated event that involves damage to irradiated fuel (Ref. 2). Fuel handling accidents, analyzed in Reference 3, include dropping a single irradiated fuel assembly and handling tool or a heavy object onto other irradiated fuel assemblies. The requirements of LCO 3.9.6, "Refueling Canal Water Level," and the minimum decay time of [100] hours prior to CORE ALTERATIONS ensure that the release of fission product radioactivity subsequent to a fuel handling accident results in doses that are within the requirements specified in 10 CFR 100. The acceptance limits for offsite radiation exposure are contained in Reference 2.

Containment penetrations satisfy Criterion 3 of the NRC Policy Statement.

LCO

Insert 1

This LCO limits the consequences of a fuel handling accident in containment by limiting the potential escape paths for fission product radioactivity from containment. The LCO requires any penetration providing direct access from the containment atmosphere to the outside atmosphere to be closed except for the OPERABLE containment purge and exhaust penetrations. For the OPERABLE containment purge and exhaust penetrations, this LCO ensures that these penetrations are isolable by the RB purge isolation signal. The OPERABILITY requirements for this LCO ensure that the automatic purge and exhaust valve closure times specified in the FSAR can be achieved and therefore meet the assumptions used in the safety analysis to ensure releases through the valves are terminated such that radiological doses are within the acceptance limit.

[and the
Containment
Personnel
airlocks.]

Insert 2

APPLICABILITY

The containment penetration requirements are applicable during CORE ALTERATIONS or movement of irradiated fuel assemblies within containment because this is when there is a potential for a fuel handling accident. In MODES 1, 2, 3, and 4, containment penetration requirements are addressed by LCO 3.6.1. In MODES 5 and 6, when CORE ALTERATIONS or movement of irradiated fuel assemblies within containment

(continued)

TS TF-68, Rev 2

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.9.3.1 (continued)

radioactivity within the containment will not result in a release of fission product radioactivity to the environment.

Insert 3

SR 3.9.3.2

This Surveillance demonstrates that each containment purge and exhaust valve actuates to its isolation position on manual initiation or on an actual or simulated high radiation signal. The 18 month Frequency maintains consistency with other similar ESFAS instrumentation and valve testing requirements. In LCO 3.3.15, "RB Purge Isolation High Radiation," the isolation instrumentation requires a CHANNEL CHECK every 12 hours and a CHANNEL FUNCTIONAL TEST every 92 days to ensure the channel OPERABILITY during refueling operations. Every 18 months a CHANNEL CALIBRATION is performed. The system actuation response time is demonstrated every 18 months, during refueling, on a STAGGERED TEST BASIS. SR 3.6.3.5 demonstrates that the isolation time of each valve is in accordance with the Inservice Testing Program requirements. These Surveillances performed during MODE 6 will ensure that the valves are capable of closing after a postulated fuel handling accident to limit a release of fission product radioactivity from the containment.

REFERENCES

1. GPU Nuclear Safety Evaluation SE-0002000-001, Rev. 0, May 20, 1988.
 2. FSAR, Section [].
 3. NUREG-0800, Section 15.7.4, Rev. 1, July 1981.
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TSTF-68, Rev 2

3.9 REFUELING OPERATIONS

3.9.4 Containment Penetrations

LCO 3.9.4 The containment penetrations shall be in the following status:

- a. The equipment hatch closed and held in place by [four] bolts;
- b. One door in each air lock closed; and
- c. Each penetration providing direct access from the containment atmosphere to the outside atmosphere either:
 - 1. closed by a manual or automatic isolation valve, blind flange, or equivalent, or
 - 2. capable of being closed by an OPERABLE Containment Purge and Exhaust Isolation System.

[is capable of being]

APPLICABILITY: During CORE ALTERATIONS,
During movement of irradiated fuel assemblies within containment.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more containment penetrations not in required status.	A.1 Suspend CORE ALTERATIONS.	Immediately
	<u>AND</u> A.2 Suspend movement of irradiated fuel assemblies within containment.	Immediately

BASES

BACKGROUND
(continued)

when containment closure is not required, the door interlock mechanism may be disabled, allowing both doors of an air lock to remain open for extended periods when frequent containment entry is necessary. During CORE ALTERATIONS or movement of irradiated fuel assemblies within containment, containment closure is required; therefore, the door interlock mechanism may remain disabled, but one air lock door must always remain closed.

[capable of being]

The requirements for containment penetration closure ensure that a release of fission product radioactivity within containment will be restricted from escaping to the environment. The closure restrictions are sufficient to restrict fission product radioactivity release from containment due to a fuel handling accident during refueling.

(to within regulatory limits)

The Containment Purge and Exhaust System includes two subsystems. The normal subsystem includes a 42 inch purge penetration and a 42 inch exhaust penetration. The second subsystem, a minipurge system, includes an 8 inch purge penetration and an 8 inch exhaust penetration. During MODES 1, 2, 3, and 4, the two valves in each of the normal purge and exhaust penetrations are secured in the closed position. The two valves in each of the two minipurge penetrations can be opened intermittently, but are closed automatically by the Engineered Safety Features Actuation System (ESFAS). Neither of the subsystems is subject to a Specification in MODE 5.

In MODE 6, large air exchangers are necessary to conduct refueling operations. The normal 42 inch purge system is used for this purpose, and all four valves are closed by the ESFAS in accordance with LCO 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation."

The minipurge system remains operational in MODE 6, and all four valves are also closed by the ESFAS.

or

The minipurge system is not used in MODE 6. All four 8 inch valves are secured in the closed position.

The other containment penetrations that provide direct access from containment atmosphere to outside atmosphere

(continued)

BASES

BACKGROUND
(continued)

must be isolated on at least one side. Isolation may be achieved by an OPERABLE automatic isolation valve, or by a manual isolation valve, blind flange, or equivalent. Equivalent isolation methods must be approved and may include use of a material that can provide a temporary, atmospheric pressure, ventilation barrier for the other containment penetrations during fuel movements (Ref. 1).

APPLICABLE
SAFETY ANALYSES

During CORE ALTERATIONS or movement of irradiated fuel assemblies within containment, the most severe radiological consequences result from a fuel handling accident. The fuel handling accident is a postulated event that involves damage to irradiated fuel (Ref. 2). Fuel handling accidents, analyzed in Reference 3, include dropping a single irradiated fuel assembly and handling tool or a heavy object onto other irradiated fuel assemblies. The requirements of LCO 3.9.7, "Refueling Cavity Water Level," and the minimum decay time of 100 hours prior to CORE ALTERATIONS ensure that the release of fission product radioactivity, subsequent to a fuel handling accident, results in doses that are well within the guideline values specified in 10 CFR 100. Standard Review Plan, Section 15.7.4, Rev. 1 (Ref. 3), defines "well within" 10 CFR 100 to be 25% or less of the 10 CFR 100 values. The acceptance limits for offsite radiation exposure will be 25% of 10 CFR 100 values or the NRC staff approved licensing basis (e.g., a specified fraction of 10 CFR 100 limits).

Containment penetrations satisfy Criterion 3 of the NRC Policy Statement.

LCO

Insert 1

[and the
Containment
personnel
airlocks]

This LCO limits the consequences of a fuel handling accident in containment by limiting the potential escape paths for fission product radioactivity released within containment. The LCO requires any penetration providing direct access from the containment atmosphere to the outside atmosphere to be closed except for the OPERABLE containment purge and exhaust penetrations. For the OPERABLE containment purge and exhaust penetrations, this LCO ensures that these penetrations are isolable by the Containment Purge and Exhaust Isolation System. The OPERABILITY requirements for this LCO ensure that the automatic purge and exhaust valve

(continued)

BASES

LCO
(continued)

closure times specified in the FSAR can be achieved and, therefore, meet the assumptions used in the safety analysis to ensure that releases through the valves are terminated, such that radiological doses are within the acceptance limit.

Insert 2 →

APPLICABILITY

The containment penetration requirements are applicable during CORE ALTERATIONS or movement of irradiated fuel assemblies within containment because this is when there is a potential for a fuel handling accident. In MODES 1, 2, 3, and 4, containment penetration requirements are addressed by LCO 3.6.1. In MODES 5 and 6, when CORE ALTERATIONS or movement of irradiated fuel assemblies within containment are not being conducted, the potential for a fuel handling accident does not exist. Therefore, under these conditions no requirements are placed on containment penetration status.

ACTIONS

A.1 and A.2

If the containment equipment hatch, air locks, or any containment penetration that provides direct access from the containment atmosphere to the outside atmosphere is not in the required status, including the Containment Purge and Exhaust Isolation System not capable of automatic actuation when the purge and exhaust valves are open, the unit must be placed in a condition where the isolation function is not needed. This is accomplished by immediately suspending CORE ALTERATIONS and movement of irradiated fuel assemblies within containment. Performance of these actions shall not preclude completion of movement of a component to a safe position.

SURVEILLANCE
REQUIREMENTS

SR 3.9.4.1

This Surveillance demonstrates that each of the containment penetrations required to be in its closed position is in that position. The Surveillance on the open purge and exhaust valves will demonstrate that the valves are not blocked from closing. Also the Surveillance will

(continued)

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.9.4.1 (continued)

demonstrate that each valve operator has motive power, which will ensure that each valve is capable of being closed by an OPERABLE automatic containment purge and exhaust isolation signal.

The Surveillance is performed every 7 days during CORE ALTERATIONS or movement of irradiated fuel assemblies within containment. The Surveillance interval is selected to be commensurate with the normal duration of time to complete fuel handling operations. A surveillance before the start of refueling operations will provide two or three surveillance verifications during the applicable period for this LCO. As such, this Surveillance ensures that a postulated fuel handling accident that releases fission product radioactivity within the containment will not result in a release of fission product radioactivity to the environment.

Insert 3

SR 3.9.4.2

This Surveillance demonstrates that each containment purge and exhaust valve actuates to its isolation position on manual initiation or on an actual or simulated high radiation signal. The 18 month Frequency maintains consistency with other similar ESFAS instrumentation and valve testing requirements. In LCO 3.3.6, the Containment Purge and Exhaust Isolation instrumentation requires a CHANNEL CHECK every 12 hours and a COT every 92 days to ensure the channel OPERABILITY during refueling operations. Every 18 months a CHANNEL CALIBRATION is performed. The system actuation response time is demonstrated every 18 months, during refueling, on a STAGGERED TEST BASIS. SR 3.6.3.5 demonstrates that the isolation time of each valve is in accordance with the Inservice Testing Program requirements. These Surveillances performed during MODE 6 will ensure that the valves are capable of closing after a postulated fuel handling accident to limit a release of fission product radioactivity from the containment.

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TSTF-68, Rev 2

3.9 REFUELING OPERATIONS

3.9.3 Containment Penetrations

LCO 3.9.3 The containment penetrations shall be in the following status:

- a. The equipment hatch closed and held in place by [four] bolts;
- b. One door in each air lock closed; and
- c. Each penetration providing direct access from the containment atmosphere to the outside atmosphere either:
 - 1. closed by a manual or automatic isolation valve, blind flange, or equivalent, or
 - 2. capable of being closed by an OPERABLE Containment Purge and Exhaust Isolation System.

[is capable of being]

APPLICABILITY: During CORE ALTERATIONS,
During movement of irradiated fuel assemblies within containment.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more containment penetrations not in required status.	A.1 Suspend CORE ALTERATIONS.	Immediately
	<u>AND</u> A.2 Suspend movement of irradiated fuel assemblies within containment.	Immediately

BASES

BACKGROUND
(continued)

closure is not required, the door interlock mechanism may be disabled, allowing both doors of an air lock to remain open for extended periods when frequent containment entry is necessary. During CORE ALTERATIONS or movement of irradiated fuel assemblies within containment, containment closure is required; therefore, the door interlock mechanism may remain disabled, but one air lock door must always remain closed.

[Capable of being]

The requirements on containment penetration closure ensure that a release of fission product radioactivity within containment will be restricted from escaping to the environment. The closure restrictions are sufficient to restrict fission product radioactivity release from containment due to a fuel handling accident during refueling.

to within regulatory limits.

The Containment Purge and Exhaust System includes two subsystems. The normal subsystem includes a 42 inch purge penetration and a 42 inch exhaust penetration. The second subsystem, a minipurge system, includes an 8 inch purge penetration and an 8 inch exhaust penetration. During MODES 1, 2, 3, and 4, the two valves in each of the normal purge and exhaust penetrations are secured in the closed position. The two valves in each of the two minipurge penetrations can be opened intermittently, but are closed automatically by the Engineered Safety Features Actuation System (ESFAS). Neither of the subsystems is subject to a Specification in MODE 5.

In MODE 6, large air exchanges are necessary to conduct refueling operations. The normal 42 inch purge system is used for this purpose and all valves are closed by the ESFAS in accordance with LCO 3.3.2, "Reactor Protective System (RPS)—Shutdown."

The minipurge system remains operational in MODE 6 and all four valves are also closed by the ESFAS.

or

The minipurge system is not used in MODE 6. All four [8] inch valves are secured in the closed position.

The other containment penetrations that provide direct access from containment atmosphere to outside atmosphere

(continued)

TSTF-68, Rev 2

BASES

BACKGROUND
(continued)

must be isolated on at least one side. Isolation may be achieved by an OPERABLE automatic isolation valve, or by a manual isolation valve, blind flange, or equivalent. Equivalent isolation methods must be approved and may include use of a material that can provide a temporary, atmospheric pressure ventilation barrier for the other containment penetrations during fuel movements (Ref. 1).

APPLICABLE
SAFETY ANALYSES

During CORE ALTERATIONS or movement of irradiated fuel assemblies within containment, the most severe radiological consequences result from a fuel handling accident. The fuel handling accident is a postulated event that involves damage to irradiated fuel (Ref. 2). Fuel handling accidents, analyzed in Reference 3, include dropping a single irradiated fuel assembly and handling tool or a heavy object onto other irradiated fuel assemblies. The requirements of LCO 3.9.6, "Refueling Water Level," and the minimum decay time of [72] hours prior to CORE ALTERATIONS ensure that the release of fission product radioactivity, subsequent to a fuel handling accident, results in doses that are well within the guideline values specified in 10 CFR 100. The acceptance limits for offsite radiation exposure are contained in Standard Review Plan Section 15.7.4, Rev. 1 (Ref. 2), which defines "well within" 10 CFR 100 to be 25% or less of the 10 CFR 100 values.

Containment penetrations satisfy Criterion 3 of the NRC Policy Statement.

LCO

Insert 1 →

This LCO limits the consequences of a fuel handling accident in containment by limiting the potential escape paths for fission product radioactivity released within containment. The LCO requires any penetration providing direct access from the containment atmosphere to the outside atmosphere to be closed except for the OPERABLE containment purge and exhaust penetrations. For the OPERABLE containment purge and exhaust penetrations, this LCO ensures that these penetrations are isolable by the Containment Purge and Exhaust Isolation System. The OPERABILITY requirements for this LCO ensure that the automatic purge and exhaust valve closure times specified in the FSAR can be achieved and therefore meet the assumptions used in the safety analysis

[and the Containment Personnel airtlocks.]

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TSTF-68, Rev 2

BASES

LCO
(continued)

Insert 2 →

to ensure releases through the valves are terminated, such that the radiological doses are within the acceptance limit.

APPLICABILITY

The containment penetration requirements are applicable during CORE ALTERATIONS or movement of irradiated fuel assemblies within containment because this is when there is a potential for a fuel handling accident. In MODES 1, 2, 3, and 4, containment penetration requirements are addressed by LCO 3.6.1, "Containment." In MODES 5 and 6, when CORE ALTERATIONS or movement of irradiated fuel assemblies within containment are not being conducted, the potential for a fuel handling accident does not exist. Therefore, under these conditions no requirements are placed on containment penetration status.

ACTIONS

A.1 and A.2

With the containment equipment hatch, air locks, or any containment penetration that provides direct access from the containment atmosphere to the outside atmosphere not in the required status, including the Containment Purge and Exhaust Isolation System not capable of automatic actuation when the purge and exhaust valves are open, the unit must be placed in a condition in which the isolation function is not needed. This is accomplished by immediately suspending CORE ALTERATIONS and movement of irradiated fuel assemblies within containment. Performance of these actions shall not preclude completion of movement of a component to a safe position.

SURVEILLANCE
REQUIREMENTS

SR 3.9.3.1

This Surveillance demonstrates that each of the containment penetrations required to be in its closed position is in that position. The Surveillance on the open purge and exhaust valves will demonstrate that the valves are not blocked from closing. Also, the Surveillance will demonstrate that each valve operator has motive power, which will ensure each valve is capable of being closed by an

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TSTF-68, Rev. 2

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.9.3.1 (continued)

OPERABLE automatic containment purge and exhaust isolation signal.

The Surveillance is performed every 7 days during CORE ALTERATIONS or movement of irradiated fuel assemblies within the containment. The Surveillance interval is selected to be commensurate with the normal duration of time to complete fuel handling operations. A surveillance before the start of refueling operations will provide two or three surveillance verifications during the applicable period for this LCO. As such, this Surveillance ensures that a postulated fuel handling accident that releases fission product radioactivity within the containment will not result in a release of fission product radioactivity to the environment.

Insert 3

SR 3.9.3.2

This Surveillance demonstrates that each containment purge and exhaust valve actuates to its isolation position on manual initiation or on an actual or simulated high radiation signal. The 18 month Frequency maintains consistency with other similar ESFAS instrumentation and valve testing requirements. In LCO 3.3.4 [(Digital) or 3.3.3 (Analog)], "Miscellaneous Actuations," the Containment Purge Isolation Signal System requires a CHANNEL CHECK every 7 days and a CHANNEL FUNCTIONAL TEST every 31 days to ensure the channel OPERABILITY during refueling operations. Every 18 months a CHANNEL CALIBRATION is performed. The system actuation response time is demonstrated every 18 months, during refueling, on a STAGGERED TEST BASIS. SR 3.6.3.5 demonstrates that the isolation time of each valve is in accordance with the Inservice Testing Program requirements. These surveillances performed during MODE 6 will ensure that the valves are capable of closing after a postulated fuel handling accident to limit a release of fission product radioactivity from the containment.

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