Bryce L. Shriver
Senior Vice President and
Chief Nuclear Officer

PPL Susquehanna, LLC
769 Salem Boulevard
Berwick, PA 18603
Tel. 570.542.3120 Fax 570.542.1504
blshriver@pplweb.com

MAR 0 5 2004

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Stop OP1-17
Washington, DC 20555

SUSQUEHANNA STEAM ELECTRIC STATION
PROPOSED LICENSE AMENDMENT
NUMBERS 261 FOR UNIT 1 AND 226 FOR UNIT 2
SECONDARY CONTAINMENT ACCESS DOORS
SURVEILLANCE REQUIREMENT 3.6.4.1.3
PLA-5726

Docket Nos. 50-387
and 50-388

Pursuant to 10 CFR 50.90, PPL Susquehanna, LLC hereby requests amendments to the Susquehanna Steam Electric Station (SSES) Unit 1 and Unit 2 Technical Specifications (TS), as described in the enclosure. The proposed amendments would change Technical Specification Surveillance Requirement 3.6.4.1.3 to require that only one secondary containment access door in each opening be verified closed. This change is in accordance with Technical Specification Task Force change TSTF-18. Additionally, this surveillance requirement includes a Note allowing entry and exit access between required zones within the secondary containment boundary when only one door is provided

As demonstrated in the No Significant Hazards Consideration Evaluation, the proposed amendment does not involve a significant hazards consideration.

There is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite. The proposed change does not involve any physical alteration of the plant (no new or different type of equipment will be installed) or change in methods governing normal plant operation.

There is no significant increase in individual or cumulative occupational radiation exposure. The proposed change does not involve any physical alteration of the plant (no new or different type of equipment will be installed) or change in methods governing normal plant operation.

PPL Susquehanna requests approval of the proposed change to the SSES Technical Specifications by September 1, 2004. Attachments 1 and 2 contain the Technical Specifications marked-up and retyped. Attachment 3 contains, for information, the Technical Specification Bases marked-up.

A001

The proposed changes have been approved by the SSES Plant Operations Review Committee and reviewed by the Susquehanna Review Committee. In accordance with 10 CFR 50.91(b), PPL Susquehanna LLC is providing the Commonwealth of Pennsylvania with a copy of this proposed License Amendment request.

Should you have any questions or require additional information, please contact Mr. C. T. Coddington at (610) 774-4019.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 03/05/04

B. L. Shriver

Enclosures:
PPL Susquehanna Evaluation of the Proposed Changes

Attachments:
Attachment 1 – Proposed Technical Specification Changes (Mark-up)
Attachment 2 – Proposed Technical Specification Pages (Retyped)
Attachment 3 – Proposed Technical Specification Bases Changes (Mark-up)

Copy: NRC Region 1
Mr. R. Guzman, NRC Project Manager
Mr. S. Hansell, Sr. Resident Inspector
Mr. R. Janati DEP/BRP

Enclosure to PLA-5726

PROPOSED LICENSE AMENDMENT NUMBERS 261 FOR UNIT 1 AND 226 FOR UNIT 2 SECONDARY CONTAINMENT ACCESS DOORS SURVEILLANCE REQUIREMENT 3.6.4.1.3

Subject: Application for Amendment to Technical Specification (TS) 3.6.4.1.3, Secondary Containment Access Doors

1.0 DESCRIPTION

This is a request to amend Operating Licenses NPF-14 and NPF-22 for PPL Susquehanna, LLC (PPL), Susquehanna Steam Electric Station Units 1 and 2 (SSES) respectively.

The proposed Amendment revises Technical Specification (TS) Surveillance Requirement (SR) 3.6.4.1.3 to require that only one secondary containment access door in each access opening be verified closed. Currently, each door in the access opening is required to be closed, with an exception for one door being open when being used for entry and exit provided that at least one door remains closed. Without this change, performing maintenance activities that require a single access door to be open for reasons other than entry and exit would result in entry into LCO 3.6.4.1, Action A. This would require initiation of a unit shutdown if the door remained open for greater than 4 hours. The flexibility proposed by this Amendment was identified in Technical Specification Task Force (TSTF) change TSTF-18, Revision 1, which the NRC approved and incorporated into NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4," Revision 2, dated June 2001 (Reference 1).

Additionally, the dual-unit SSES secondary containment design encompasses three "zones," which are all required to be operable during dual unit operation. The design also encompasses access doors between these zones. In a few instances, access opening between zones is via a single door. An allowance for opening these doors for entry and exit was relocated to the Bases as part of the SSES conversion to Improved Standard TS (ISTS) in Amendments 178 (Unit 1) and 151 (Unit 2) (Reference 2). This results in a conflict between SSES SR 3.6.4.1.3 and the Bases allowance. As such, this Amendment request proposes an explicit Note be included with SR 3.6.4.1.3 to allow entry and exit between required secondary containment zones where there is a single door.

Issuance of this change is requested by September 1, 2004 with a 30-day implementation date.

2.0 PROPOSED CHANGE

The proposed Amendment revises the Susquehanna Steam Electric Station (SSES) Technical Specification (TS) Surveillance Requirement SR 3.6.4.1.3 to require that only one secondary containment access door in each access opening be verified closed. This portion of the change is consistent with Technical Specification Task Force (TSTF)

generic change TSTF-18, Revision 1, and NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4," Revision 2, dated June 2001. Additionally, this Surveillance includes a Note allowing entry and exit between required secondary containment zones that have a single door. This Note was not included in SSES TS Amendments 178 and 151 for Units 1 and 2, respectively.

Associated TS Bases changes that reflect the intent of the TS changes are attached for information.

3.0 BACKGROUND

A Condition Report (CR) was written to identify the situation where certain single door accesses between secondary containment zones were not labeled or placarded to reflect that during exit and entry these doors must be administratively controlled or an entry into a secondary containment LCO must be made. During the resolution of this CR, it was determined that the Technical Specifications prior to conversion to Standard Technical Specifications contained an allowance to provide for ingress and egress through single door accesses between secondary containment zones. This allowance was relocated to the Bases during the conversion to Standard Technical Specifications. This proposal is written to restore this allowance to the Technical Specifications.

As described in SSES Final Safety Analysis Report (FSAR) Section 6.2.3, the secondary containment comprises the exterior structure of the reactor building and the interior walls and floors that separate the three ventilation zones. Zones I and II are the portions of the reactor building below the refueling floor surrounding the Unit 1 and Unit 2 primary containments, respectively. Zone III consists of the portion of the reactor buildings above the refueling floor, with the exception of the HVAC equipment rooms and the electrical equipment room, which are not parts of the secondary containment.

Entrance to the reactor building is through the turbine building or railroad truck bay with air locks provided for separation. Access into the control structure, and doors between many building ventilation zones are also provided with airlocks. Secondary containment access doors between zones within the secondary containment boundary that are not provided with airlocks are administratively controlled to maintain secondary containment integrity. These doors within the secondary containment are routinely used for personnel ingress and egress during normal plant operation.

As summarized in the Technical Specification Bases for TS 3.6.4.1, the function of the secondary containment is to contain, dilute, and hold up fission products that may leak from primary containment following a design basis accident. There are two principal accidents for which credit is taken for secondary containment integrity. These are a loss of coolant accident and a fuel handling accident inside secondary containment. The

secondary containment performs no active function in response to either of these limiting events. However, its integrity and leak tightness is required to ensure that the release of radioactive materials and fission products entrapped within the secondary containment structure will be treated by the standby gas treatment system prior to discharge to the environment.

Prior to SSES TS Amendments 178 (Unit 1) and 151 (Unit 2) (Reference 2), Specification 4.6.5.2.b included an explicit allowance (footnote " * ") for personnel ingress and egress through doors within the secondary containment (i.e., between zones). This exception to the specific requirement for all secondary containment doors to be closed was approved for relocation to the TS Bases (Discussion of Change "LA.3" for Section 3.6.4.1 in Reference 2).

TSTF-18, Revision 1, which is incorporated into NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4," Revision 2, dated June 2001, was approved by the NRC in a letter dated October 2, 1998 (Reference 3). As a recent precedent, in a letter dated February 28, 2003, the U.S. Nuclear Regulatory Commission issued Amendment Nos. 236 and 178 to Renewed Facility Operating License No. NPF-5 for E.I. Hatch Units 1 and 2, respectively (Reference 4).

4.0 TECHNICAL ANALYSIS

The proposed Amendment revises Technical Specification (TS) Surveillance Requirement (SR) 3.6.4.1.3 to require that only one secondary containment access door in each access opening be verified closed. Currently, each door in the access opening is required to be closed, with an exception for one door being open when being used for entry and exit provided that at least one door remains closed. Without this change, performing maintenance activities that requires a single access door to be open for reasons other than entry and exit would result in entry into LCO 3.6.4.1, Action A. This would require initiation of a unit shutdown if the door remained open for greater than 4 hours.

The flexibility proposed with this Amendment was identified by TSTF-18, Revision 1, which the NRC approved and incorporated into NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4," Revision 2, dated June 2001 (Reference 1).

PPL has reviewed TSTF-18, Revision 1, and has determined that the proposed change and justification are applicable to SSES. The current SSES TS require that the secondary containment access doors be verified closed except during periods of personnel ingress and egress, provided that at least one door in each access opening remains closed. The proposed change would allow access doors to be temporarily opened to perform

maintenance activities provided the at least one access door in each access opening remains closed, such that secondary containment integrity is maintained. As noted in the supporting TS Bases, all secondary containment access doors are normally maintained closed, except when the access opening is being used for entry and exit or when maintenance is being performed on an access door.

SSES TS SR 3.6.4.1.1 requires that the secondary containment be maintained at a 0.25-inch water gauge vacuum. This condition is continuously monitored and alarmed when vacuum drops below this requirement. When opening one secondary containment airlock door for performance of maintenance, integrity of the secondary containment boundary will be adequately assured by continuing to maintain the required 0.25-inch water gauge vacuum. Failure of this requirement would result in a control room alarm and immediately declaring the secondary containment inoperable.

Additionally, the dual-unit SSES secondary containment design encompasses three "zones," which are all required to be operable during dual unit operation. The design also encompasses access doors between these zones. In a few instances, access opening between zones is via a single door. An allowance for opening these doors for entry and exit was removed from the Technical Specifications and placed in the Bases as part of the SSES conversion to ISTS in Amendments 178 (Unit 1) and 151 (Unit 2) (Reference 2). This resulted in a conflict between the wording of SSES SR 3.6.4.1.3 and the relocated allowance. As such, this Amendment request proposes an explicit Note be included with SR 3.6.4.1.3 to allow entry and exit between required secondary containment zones where there is a single door. As a clarification, and to preclude a conflict with the explicit wording of SR 3.6.4.1.3, PPL is including this exception within the TS. Since this change is consistent with the intent as reflected in the Bases, and consistent with the prior SSES TS, the change is considered editorial and reflects an administrative presentation preference and not a technical change.

This Note would not apply in situations where one zone on either side of the door was not considered part of secondary containment (which is allowed during certain operating configurations). In this case, the portion of the reactor building that is not required to be included in the operable secondary containment boundary is not considered a "required zone." Single doors separating operable secondary containment from a zone that is not a "required zone" would be required to remain closed for secondary containment integrity. This explicit clarification is also provided in the Bases.

Based on the evaluation of the proposed changes: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 REGULATORY SAFETY ANALYSIS

5.1 No Significant Hazards Consideration

PPL Susquehanna, LLC (PPL) has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. **Does the proposed change involve a significant increase in the probability of occurrence or consequences of an accident previously evaluated?**

   Response: No.

   The Technical Specification Surveillance being revised, which verifies the status of the secondary containment access doors, is not an initiator to any accident sequence analyzed in the Final Safety Analysis Report (FSAR). The proposed change relaxes the acceptance criteria of this Surveillance such that maintenance on one of two airlock access doors can be performed. However, requiring that at least one door is closed, in conjunction with the continued requirement to maintain the building at a negative pressure, continues to assure that the secondary containment barrier is maintained operable. This provides adequate assurance that the secondary containment is capable of performing the accident mitigation function assumed in the accident analyses. As a result, the consequences of any accident previously evaluated are not significantly affected.

   The Note, which was added to the Technical Specifications, provides clarification and precludes a conflict with the explicit wording of SR 3.6.4.1.3. Since this Note is consistent with the intent as reflected in the Bases and with the prior SSES Technical Specifications, the change is considered editorial and reflects an administrative presentation preference and not a technical change.

   Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. **Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?**

   Response: No.

   The proposed change does not involve a physical alteration of the plant. No new equipment is being introduced, and installed equipment is not being operated in a new or different manner. There are no setpoints, at which protective or mitigative actions

are initiated, affected by this change. This change does not alter the manner in which equipment operation is initiated, nor are the function demands on credited equipment changed. No alterations in the procedures that ensure the plant remains within analyzed limits are being proposed, and no changes are being made to the procedures relied upon to respond to an off-normal event as described in the FSAR. As such, no new failure modes are being introduced.

The Note, which was added to the Technical Specifications, provides clarification and precludes a conflict with the explicit wording of SR 3.6.4.1.3. Since this Note is consistent with the intent as reflected in the Bases and with the prior SSES Technical Specifications, the change is considered editorial and reflects an administrative presentation preference and not a technical change.

The change does not alter assumptions made in the safety analysis and licensing basis.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

The margin of safety is established through equipment design, operating parameters, and the setpoints at which automatic actions are initiated. The change could allow additional time for one of two airlock doors to be open for maintenance. However, the margin of safety is maintained by the continued closure of the remaining airlock door (as is currently allowed for normal entry and exit) and the continued requirement to be able to maintain the building at a negative pressure.

The Note, which was added to the Technical Specifications, provides clarification and precludes a conflict with the explicit wording of SR 3.6.4.1.3. Since this Note is consistent with the intent as reflected in the Bases and with the prior SSES Technical Specifications, the change is considered editorial and reflects an administrative presentation preference and not a technical change.

Therefore the plant response to analyzed events continues to provide the margin of safety assumed by the analysis.

5.2 Applicable Regulatory Requirements/Criteria

SSES FSAR Sections 3.1 and 3.13 provide detailed discussion of SSES compliance with the applicable regulatory requirements and guidance. SSES FSAR Section 6.2.3 describes the purpose and function of the secondary containment. The proposed TS amendment:

(a) Does not alter the design or function of any system;

(b) Does not result in any change in the qualifications of any component; and

(c) Does not result in the reclassification of any component's status in the areas of shared, safety related, independent, redundant, and physically or electrically separated.

Additionally, PPL has considered the regulatory criteria of 10 CFR 50.36(c)(2) ("Limiting conditions for operation") and the 10 CFR 50.36(c)(2)(ii) Criteria for inclusion in TS, as well as 10 CFR 50.36(c)(3) ("Surveillance requirements"). As a Criterion 3 structure that functions to mitigate an accident, maintaining the secondary containment barrier with the revised Surveillance remains consistent with these requirements. Furthermore, the revised Surveillance Requirement continues to assure that the secondary containment barrier will be maintained and as such, the operability of secondary containment required by the limiting condition for operation will be met.

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

6.0 ENVIRONMENTAL CONSIDERATIONS

10 CFR 51.22(c)(9) identifies certain licensing and regulatory actions, which are eligible for categorical exclusion from the requirement to perform an environmental assessment. A proposed amendment to an operating license for a facility does not require an environmental assessment if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant hazards consideration; (2) result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite; or (3) result in a significant increase in individual or cumulative occupational radiation exposure. PPL Susquehanna, LLC has evaluated the proposed change and has determined that the proposed change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Accordingly, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with issuance of the amendment. The basis for this determination, using the above criteria, follows:

Basis

As demonstrated in the No Significant Hazards Consideration Evaluation, the proposed amendment does not involve a significant hazards consideration.

There is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite. The proposed change does not involve any physical alteration of the plant (no new or different type of equipment will be installed) or change in methods governing normal plant operation.

There is no significant increase in individual or cumulative occupational radiation exposure. The proposed change does not involve any physical alteration of the plant (no new or different type of equipment will be installed) or change in methods governing normal plant operation.

7.0 REFERENCES

1. NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4," Revision 2, dated June 2001.

2. Letter, V. Nerses (NRC) to R. G. Byram (PP&L), "Susquehanna Steam Electric Station, Units 1 and 2 (TAC NOS. M96327 and M96328)," Amendment Nos. 178 and 151, dated July 30,1998.

3. Letter, Beckner (NRC) to Davis (NEI), "Technical Specification Task Force Meeting Summary," dated October 2, 1998.

4. Letter, Olshan (NRC) to Sumner, "Edwin I. Hatch Nuclear Plant, Units 1 and 2: Issuance of Amendments (TAC NOS. MB6936 and MB6937)," Amendment Nos. 236 and 178, dated February 28, 2003.

ATTACHMENT 1 to PLA-5726

Proposed Technical Specification Change (Mark-Up)

Units 1 and 2)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. (continued)	C.2 Suspend CORE ALTERATIONS. AND C.3 Initiate action to suspend OPDRVs.	Immediately Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.4.1.1	Verify secondary containment vacuum is ≥ 0.25 inch of vacuum water gauge.	24 hours
SR 3.6.4.1.2	Verify all required secondary containment removable walls and equipment hatches required to be closed are closed and sealed.	31 days
SR 3.6.4.1.3	Verify ~~each~~ one secondary containment access door in each access opening is closed. ~~except when the access opening is being used for entry and exit, then at least one door shall be closed~~.	31 days

INSERT
--NOTE--

(continued)

INSERT — NOTE — (U1: pg TS / 3.6-36)

----------NOTE----------
Single door access openings between required zones within the secondary containment boundary may be opened for entry and exit.

(continued)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. (continued)	C.2 Suspend CORE ALTERATIONS. AND C.3 Initiate action to suspend OPDRVs.	Immediately Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.4.1.1	Verify secondary containment vacuum is ≥ 0.25 inch of vacuum water gauge.	24 hours
SR 3.6.4.1.2	Verify all required secondary containment removable walls and equipment hatches required to be closed are closed and sealed.	31 days
SR 3.6.4.1.3	Verify ~~each~~ one secondary containment access door in each access opening is closed ~~except when the access opening is being used for entry and exit, then at least one door shall be closed.~~	31 days

INSERT
- - NOTE - -

(continued)

INSERT — NOTE — (U2: pg TS / 3.6-36)

----------NOTE----------
Single door access openings between required zones within the secondary containment boundary may be opened for entry and exit.

ATTACHMENT 2 to PLA-5726

Proposed Technical Specification Pages (Retyped)

(Units 1 and 2)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. (continued)	C.2 Suspend CORE ALTERATIONS. AND C.3 Initiate action to suspend OPDRVs.	Immediately Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.4.1.1	Verify secondary containment vacuum is ≥ 0.25 inch of vacuum water gauge.	24 hours
SR 3.6.4.1.2	Verify all required secondary containment removable walls and equipment hatches required to be closed are closed and sealed.	31 days
	----------NOTE---------- Single door access openings between required zones within the secondary containment boundary may be opened for entry and exit. ----------	
SR 3.6.4.1.3	Verify one secondary containment access door in each access opening is closed.	31 days

(continued)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. (continued)	C.2 Suspend CORE ALTERATIONS. AND C.3 Initiate action to suspend OPDRVs.	Immediately Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.4.1.1	Verify secondary containment vacuum is ≥ 0.25 inch of vacuum water gauge.	24 hours
SR 3.6.4.1.2	Verify all required secondary containment removable walls and equipment hatches required to be closed are closed and sealed.	31 days
	----------NOTE---------- Single door access openings between required zones within the secondary containment boundary may be opened for entry and exit. ----------	
SR 3.6.4.1.3	Verify one secondary containment access door in each access opening is closed.	31 days

(continued)

ATTACHMENT 3 to PLA-5726

Proposed Technical Specification Bases Changes (Bases Mark-ups)

(Units 1 & 2)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.6.4.1.1 (continued)

The 24 hour Frequency of this SR was developed based on operating experience related to secondary containment vacuum variations during the applicable MODES and the low probability of a DBA occurring between surveillances.

Furthermore, the 24 hour Frequency is considered adequate in view of other indications available in the control room, including alarms, to alert the operator to an abnormal secondary containment vacuum condition.

SR 3.6.4.1.2 and SR 3.6.4.1.3

Verifying that secondary containment equipment hatches, removable walls and access door~~s~~ in each access opening required to be closed are closed ensures that the infiltration of outside air of such a magnitude as to prevent maintaining the desired negative pressure does not occur.

When the railroad bay door (No. 101) is closed; all Zone I and III hatches, removable walls, dampers, and door~~s~~ in each access opening connected to the railroad access bay are closed; or, only Zone I removable walls and/or doors are open to the railroad access shaft; or, only Zone III hatches and/or dampers are open to the railroad access shaft. When the railroad bay door (No. 101) is open; all Zone I and III hatches, removable walls, dampers, and door~~s~~ connected to the railroad access bay are closed. The truck bay hatch is closed and the truck bay door (No. 102) is closed unless Zone II is isolated from Zones I and III.

Verifying that all such openings are closed also provides adequate assurance that exfiltration from the secondary containment will not occur. In this application, the term "sealed" has no connotation of leak tightness. ~~Maintaining secondary containment OPERABILITY requires verifying each door in each access opening to the secondary containment zones and each access opening between the secondary containment zones is closed~~.

INSERT BASES-1

When an access opening to secondary containment is being used for exit and entry, then at least one door must remain closed.

(continued)

INSERT BASES-1 (U1: pg TS / B 3.6-88)

An access opening typically contains one inner and one outer door. Maintaining secondary containment OPERABILITY requires verifying one door in each access opening to secondary containment zones is closed. In some cases (e.g., railroad bay), secondary containment access openings are shared such that a secondary containment barrier may have multiple inner or multiple outer doors. The intent is to maintain the secondary containment barrier intact, which is achieved by maintaining the inner or outer portion of the barrier closed at all times. However, all secondary containment access doors are normally kept closed, except when the access opening is being used for entry and exit or when maintenance is being performed on an access opening.

BASES

SURVEILLANCE REQUIREMENTS

SR 3.6.4.1.2 and SR 3.6.4.1.3 (continued)

When an access opening between secondary containment zones is being used for exit and entry, then at least one door (where two doors are provided) must remain closed. The access openings between secondary containment zones which are not provided with two doors are administratively controlled to maintain secondary containment integrity during exit and entry.

INSERT BASES 2

The 31 day Frequency for these SRs has been shown to be adequate, based on operating experience, and is considered adequate in view of the other indications of door and hatch status that are available to the operator.

(continued)

INSERT BASES-2 (U1: pg TS / B 3.6-88a)

This Surveillance is modified by a Note that allows access openings with a single door (i.e., no airlock) within the secondary containment boundary (i.e., between required secondary containment zones) to be opened for entry and exit. Opening of an access door for entry and exit allows sufficient administrative control by individual personnel making the entries and exits to assure the secondary containment function is not degraded. When one of the zones is not a zone required for secondary containment OPERABILITY, the Note allowance would not apply.

BASES

SURVEILLANCE REQUIREMENTS

SR 3.6.4.1.1 (continued)

The 24 hour Frequency of this SR was developed based on operating experience related to secondary containment vacuum variations during the applicable MODES and the low probability of a DBA occurring between surveillances.

Furthermore, the 24 hour Frequency is considered adequate in view of other indications available in the control room, including alarms, to alert the operator to an abnormal secondary containment vacuum condition.

SR 3.6.4.1.2 and SR 3.6.4.1.3

one Verifying that secondary containment equipment hatches, removable walls and access door~~s~~ in each access opening required to be closed are closed ensures that the infiltration of outside air of such a magnitude as to prevent maintaining the desired negative pressure does not occur.

When the railroad bay door (No. 101) is closed; all Zone I and III hatches, removable walls, dampers, and door~~s~~ (one) in each access opening connected to the railroad access bay are closed; or, only Zone I removable walls and/or doors are open to the railroad access shaft; or, only Zone III hatches and/or dampers are open to the railroad access shaft. When the railroad bay door (No. 101) is open; all Zone I and III hatches, removable walls, dampers, and door~~s~~ (one) connected to the railroad access bay are closed. The truck bay hatch is closed and the truck bay door (No. 102) is closed unless Zone II is isolated from Zones I and III.

Verifying that all such openings are closed (also) provides adequate assurance that exfiltration from the secondary containment will not occur. In this application, the term "sealed" has no connotation of leak tightness. ~~Maintaining secondary containment OPERABILITY requires verifying each door in each access opening to the secondary containment zones and each access opening between the secondary containment zones is closed~~.

INSERT BASES-1

When an access opening to secondary containment is being used for exit and entry, then at least one door must remain closed.

(continued)

INSERT BASES-1 (U2: pg TS / B 3.6-87)

An access opening typically contains one inner and one outer door. Maintaining secondary containment OPERABILITY requires verifying one door in each access opening to secondary containment zones is closed. In some cases (e.g., railroad bay), secondary containment access openings are shared such that a secondary containment barrier may have multiple inner or multiple outer doors. The intent is to maintain the secondary containment barrier intact, which is achieved by maintaining the inner or outer portion of the barrier closed at all times. However, all secondary containment access doors are normally kept closed, except when the access opening is being used for entry and exit or when maintenance is being performed on an access opening.

BASES

SURVEILLANCE REQUIREMENTS

SR 3.6.4.1.2 and SR 3.6.4.1.3 (continued)

When an access opening between secondary containment zones is being used for exit and entry, then at least one door (where two doors are provided) must remain closed. The access openings between secondary containment zones which are not provided with two doors are administratively controlled to maintain secondary containment integrity during exit and entry.

INSERT BASES-2

The 31 day Frequency for these SRs has been shown to be adequate, based on operating experience, and is considered adequate in view of the other indications of door and hatch status that are available to the operator.

(continued)

INSERT BASES-2 (U2: pg TS / B 3.6-87a)

This Surveillance is modified by a Note that allows access openings with a single door (i.e., no airlock) within the secondary containment boundary (i.e., between required secondary containment zones) to be opened for entry and exit. Opening of an access door for entry and exit allows sufficient administrative control by individual personnel making the entries and exits to assure the secondary containment function is not degraded. When one of the zones is not a zone required for secondary containment OPERABILITY, the Note allowance would not apply.