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U. S. Nuclear Regulatory Commission
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**SUSQUEHANNA STEAM ELECTRIC STATION
PROPOSED LICENSE AMENDMENT
NUMBERS 271 FOR UNIT 1 AND 239 FOR UNIT 2
FOR A CHANGE TO TECHNICAL
SPECIFICATION SR 3.6.4.1.4 AND 3.6.4.1.5
SECONDARY CONTAINMENT DRAWDOWN TESTING Docket Nos. 50-387
PLA-5857 and 50-388**

Pursuant to 10 CFR 50.90, PPL Susquehanna, LLC (PPL) hereby requests the following 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 the Technical Specifications for Secondary Containment. This change is needed to resolve a discrepancy identified by the PPL Susquehanna LLC corrective action program.

The justification for the change to the Secondary Containment Surveillance Requirement's is based upon the evaluation presented in the Enclosure. As demonstrated in the enclosed evaluation, the proposed amendments do not involve a significant hazards consideration.

Attachments 1 contains the Technical Specifications marked-up reflecting the proposed change. Changes to the Technical Specification Bases (provided for information) are provided in Attachment 2.

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.

PPL Susquehanna, LLC requests approval of the proposed change to the SSES Technical Specifications by January 30, 2006. This change is requested to be effective 90 days from the date of issuance.

There are no regulatory commitments associated with this proposed change.

ADD

Should you have any questions or require additional information, please contact Mr. Michael H. Crowthers at (610) 774-7766.

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

Executed on: 2-7-05



B. T. McKinney

Enclosure: PPL Susquehanna Evaluation of the Proposed Changes

Attachments:

- Attachment 1 – Proposed Technical Specification Changes (Mark-up)
- Attachment 2 – Technical Specification Bases Changes (Provided for information)

Copy: NRC Region 1

Mr. A. J. Blamey, Sr. Resident NRC Inspector
Mr. R. V. Guzman, NRC Project Manager
Mr. R. Janati DEP/BRP

Enclosure to PLA-5857

PPL SUSQUEHANNA EVALUATION OF PROPOSED LICENSE AMENDMENT NUMBERS 271 FOR UNIT 1 AND 239 FOR UNIT 2 FOR A CHANGE TO TECHNICAL SPECIFICATION SR 3.6.4.1.4 AND 3.6.4.1.5, SECONDARY CONTAINMENT DRAWDOWN TESTING

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PPL EVALUATION

Subject: PROPOSED LICENSE AMENDMENT NUMBERS 271 FOR UNIT 1 AND 239 FOR UNIT 2 FOR A CHANGE TO TECHNICAL SPECIFICATION SR 3.6.4.1.4 AND 3.6.4.1.5, SECONDARY CONTAINMENT DRAWDOWN TESTING

1.0 DESCRIPTION

The proposal would change the Technical Specification (TS) for "Secondary Containment" LCO 3.6.4.1. The change revises the surveillance frequency note applicable to Surveillance Requirement (SR) 3.6.4.1.4 and SR 3.6.4.1.5. The current note requires revision as the basis for the note has been determined to no longer be valid. The note requires each SR be performed with the three zone configuration every 60 months.

2.0 PROPOSED CHANGE

Currently the note states:

"Once every 60 months testing will be performed in three zone configuration."

The note is proposed to be revised to state:

"Test each configuration at least one time every 60 months."

The requested changes are based upon the Susquehanna Steam Electric Station (SSES) Technical Analysis presented in Section 4.0 of the evaluation. Marked up pages reflecting the proposed changes are shown in Attachment 1.

This change is needed to resolve a discrepancy identified by the PPL Susquehanna, LLC corrective action program.

3.0 BACKGROUND

During normal operation, the Secondary Containment is required to be kept at a minimum negative pressure of 0.25 inches of water gauge with respect to outside. This is to assure that all leakage will be into the Secondary Containment. During normal operation this is accomplished by non-safety related HVAC systems.

When a Secondary Containment isolation signal is received, the safety related Reactor Building (RB) Recirculating and SGTS fans start and the normal operating, non-safety related HVAC systems are tripped. The isolated Secondary Containment zones will align to the RB Recirculation Plenum by opening of isolation dampers. The SGTS is connected to and draws air from the RB Recirculation Plenum. The removal of air from the Recirculation Plenum maintains the Secondary Containment at a negative pressure of 0.25 inches of water gauge with respect to outside.

3.1 Definition of Zone Boundaries

The Secondary Containment is divided into three ventilation zones. Zones I and II surround respective Units 1 and 2 Primary Containment below the floor at elevation 779 ft-1 in. and also include stairwells and elevator machine rooms and shafts above elevation 779 ft-1 in. Zone III includes the areas above the floor at elevation 779 ft-1 in. including the refueling floor, but excluding the HVAC fan and equipment rooms.

3.2 System Descriptions

3.2.1 Secondary Containment

The following are provided to control fission products within the Secondary Containment following a design basis accident:

- a) A Secondary Containment that completely surrounds each of the two Primary Containments.
- b) The Standby Gas Treatment System (SGTS).
- c) A Recirculation System.

The SGTS is used to maintain the affected zone(s) of the Secondary Containment at a negative pressure.

3.2.2 Standby Gas Treatment System (SGTS)

The Standby Gas Treatment System is designed to accomplish the following safety related objectives:

- a) Exhaust sufficient filtered air from the reactor building to maintain a minimum negative pressure of 0.25 inches of water in the affected volumes following Secondary Containment isolation for the following design basis events:
 - (1) Irradiated fuel handling accident in the refueling floor area.
 - (2) Loss of Coolant Accident (LOCA).

- b) Filter the exhausted air to remove radioactive particulates and both radioactive and non-radioactive forms of iodine to limit the offsite dose to the guidelines of 10 CFR 100.

Non-safety-related objectives for design of the SGTS are as follows:

- a) Filter and exhaust air from the Primary Containment for purging and ventilating.
- b) Filter and exhaust discharge from the High Pressure Coolant Injection HPCI barometric condenser.
- c) Filter and exhaust from the Primary Containment pressure relief line.
- d) Filter and exhaust nitrogen from the Primary Containment for nitrogen purging.

The airflow diagram for the SGTS is shown on the Section 6.2.3 Figures in the SSES Final Safety Analysis Report (FSAR).

3.2.3 Recirculation System

A common Recirculation system is provided for Units 1 and 2 to perform the following safety-related functions:

- a) Mix the atmosphere in the secondary containment to obtain a lesser and more uniform concentration of radioactivity following a Design Basis Accident (DBA) Loss Of Coolant Accident (LOCA) or a refueling accident.
- b) Prevent the spread of radioactivity by the heating-ventilating-cooling systems between Zone III and Zones I or II during and after an irradiated fuel handling accident.
- c) Provide mixing of the atmosphere within the secondary containment. This may involve mixing the atmosphere of all three zones; of Zone I or Zone II and the refueling area (Zone III); or of Zone III alone, particularly in case of the fuel handling accident in b), above.

The Reactor Building Recirculating System is shown on the Section 6.2.3 Figures in the SSES Final Safety Analysis Report (FSAR).

3.2.4 System Operation

When a LOCA signal is initiated, the Secondary Containment will receive an isolation signal (normal HVAC is shutdown and isolated). The HVAC systems of the unit with a LOCA signal and Zone III will align to the recirculation system and the Standby Gas Treatment System (SGTS) will begin to draw air from the recirculation system. Note for a Loss of Offsite Power (LOOP) all three zones will isolate and align to the recirculation system. During the time to start the recirculation system and align the isolated zones, the Secondary Containment pressure will rise and ultimately exceed the -0.25" water gauge (w.g.) pressure requirement. This is due to building heat-up and in-leakage from outside. The SGTS will re-establish the negative pressure in Secondary Containment. The time from when negative pressure is lost to the time the SGTS can re-establish the negative pressure is referred to as the draw down time.

3.3 Technical Specification Surveillance Test History

The original Unit 1 Technical Specifications (TS) did not account for Unit 2 as it was not yet operational and could not be aligned to the OPERABLE secondary containment.

In 1984, PPL proposed changes to the Unit 1 Technical Specifications to clarify test requirements for both three zone and two zone operation. The NRC approved the Technical Specification change in Amendment 21 for Unit 1. Amendment 21 to the Unit 1 TS added the requirement to test the three zone configuration every 60 months. The NRC Safety Evaluation supporting Amendment 21 identifies the 60-month tests was added at the request of the NRC. No basis is provided in the NRC Safety Evaluation. The PPL submittals did not propose this change. Without the note, it would have been possible that a three zone configuration test would never have been performed.

The Unit 2 TS were subsequently issued to be consistent with the Unit 1 TS approved in Unit 1 Amendment 21.

When the Improved Technical Specifications were implemented, the test acceptance criteria and specification of the secondary containment configurations were relocated to the TS bases. Thus, descriptions and discussion presented in the TS Bases Table for SR 3.6.4.1.4 and 3.6.4.1.5 provide a synopsis of the test configurations and acceptance criteria. The TS bases wording describing that the three zone test configuration is the "most limiting" was added at the time of the conversion to ITS to assure the SSES design was accurately described. The TS bases for the TS's that existed before conversion to the ITS format did not contain the same description that the three zone was the "most limiting."

TS SR 3.6.4.1.4 verifies that each SGTS subsystem can draw down secondary containment to ≥ 0.25 " of vacuum w.g. The maximum draw down time allowed to achieve ≥ 0.25 " of vacuum w.g. is dependent on the configuration of the secondary

containment (i.e. 2 zones or 3). The maximum acceptable test draw down time is specified in the TS bases.

TS SR 3.6.4.1.5 verifies that each SGTS subsystem can maintain secondary containment at $\geq 0.25''$ of vacuum w.g. for one (1) hour at a SGTS flow rate of less than or equal to maximum allowed values specified in the TS bases. As with the draw down time, the maximum flow values are dependent on the configuration of the secondary containment (i.e. 2 zones or 3). The maximum acceptable test flow rates are specified in the TS bases.

The tests assure performance is within the assumptions of the radiological dose consequence analysis.

The SR's are required to be performed every 24 months on the secondary containment configuration alignment when the test is performed. The three zone configuration is to be tested at least once every 60 months per the surveillance frequency note (proposed to be revised herein). The TS bases describe the three-zone configuration as the "most limiting". The SGTS subsystems are tested on a staggered test basis as described in the TS bases.

Though the SR's are not required to be performed on all secondary containment configurations every 24 months, PPL has been performing the SR's on all configurations every 24 months. Thus the intent of the TS to test the most limiting configuration every 60 months has been met even though it is not required by the TS. PPL test procedures assure testing of all three configurations at least once every 60 months to assure that the limiting configuration is tested in that time frame, as per the intent of the current TS requirement.

Test data for the last six (6) tests show that the 3 zone configuration is the most limiting for the draw down test (SR 3.6.4.1.4) but not necessarily for the flow test (SR 3.6.4.1.5). The test data reflecting these conclusions is shown in the below Table.

Secondary Containment Test Data						
Test Date	6/2/1994	12/1/1995	4/22/1997	5/4/1999	6/15/2001	4/18/2003
SR 3.6.4.1.4 Drawdown Time Test						
SGTS Subsystem Tested	A	B	A	B	A	B
Zone 1 & 3 Drawdown Time (sec)	21.1	44.9	46.3	38.2	49.8	60
Margin to criteria	117	95.9	72.1	70.7	78.8	57
Zone 2 & 3 Drawdown Time (sec)	22.6	48.4	40.6	46.1	46.2	61
Margin to criteria	118	95.4	69.6	77.4	71.9	57
Zone 1 & 2 & 3 Drawdown Time (sec)	44.9	71.6	84.6	72.6	73.3	94
Margin to criteria	125	80.1	53.4	40.4	52.4	31
SR 3.6.4.1.5 Flow Test						
SGTS Subsystem Tested	A	B	A	B	A	B
Zone 1 & 3 flow (CFM)	2792	2633	2050	2350	1517	2300
Margin to Criteria	2885	93	252	835	535	1368
Zone 2 & 3 Avg Flow (CFM)	2583	2592	2267	2125	2783	2300
Margin to criteria	2960	377	368	693	835	177
Zone 1 & 2 & 3 Avg Flow (CFM)	3633	3167	3667	3330	3617	3483
Margin to criteria	4000	367	833	333	670	383

Conclusions:

1. Draw down time test data (SR 3.6.4.1.4) shows that the zone 1 & 2 & 3 configuration is always most limiting.
2. Flow test (SR 3.6.4.1.5) data shows that the zone 1 & 2 & 3 configuration is not always most limiting.

3.4 FSAR References

Related background in the SSES FSAR (Reference 1) is found in Section 1.2. Compliance with NRC design criteria is described in detail in FSAR Sections 3.1 and 3.13. Detailed descriptions can be found in the SSES FSAR Section 6.2.3 Secondary Containment Functional Design, Section 6.5.1.1 Standby Gas Treatment System, and Section 6.5.3.2 Secondary Containment.

4.0 TECHNICAL ANALYSIS

The proposed changes have been evaluated. It has been determined that current regulations and applicable requirements continue to be met, that adequate defense-in-depth and sufficient safety margins are maintained, as discussed in Section 4.2.

SSES is designed and operated consistent with the defense-in-depth philosophy. The defense-in-depth philosophy in reactor design and operation results in multiple means to accomplish safety functions and prevent release of radioactive material. The impact of the proposed Technical Specification changes were evaluated and determined to be consistent with the defense-in-depth philosophy.

These proposed changes do not require any new operator response or introduce any new opportunities for operator errors not previously considered. No other new operator actions are necessary.

The note applied to SR 3.6.4.1.5 to test the three zone configuration every 60 months because it is the "most limiting", is believed to be based on an assumption that since the three zone configuration presents the largest boundary area, the largest surface boundary would present the greatest challenge to establishing and maintaining the secondary containment within the bounds of the design base radiological analyses. Testing has proven this to not necessarily be the case. As can be seen from the data previously provided, the other configurations, at times, have been the most limiting (i.e. least margin to the analysis assumed parameters). This has and is expected to occur in the future because each boundary configuration has portions that are not common with the other two configurations. The portions of each that are not common are impacting the results.

Thus the TS requirement to test the three-zone configuration, since it is the most limiting every 60 months, does not provide the necessary assurance that the most limiting configuration is tested at a frequency no more than once every 60 months. Thus the note is proposed to be revised to assure that all configurations are tested within 60-months.

The note for SR 3.6.4.1.4 is also being revised to be consistent with the revised note for 3.6.4.1.5.

This revised test frequency requirement provided by the revised note, will require, consistent with the original intent, that the most limiting secondary containment configuration be tested at least once every 60-months. The 60-month frequency remains acceptable and is consistent with the original intent to test the most limiting secondary containment configuration. The basis for the 60 month frequency currently specified in the TS bases remains valid and acceptable since operating experience has shown that these components usually pass the Surveillance and all active components are tested more frequently.

5.0 REGULATORY SAFETY ANALYSIS

5.1 No Significant Hazards Consideration

The proposed amendments would change the Technical Specifications SR test frequency requirements for Secondary Containment. This change is needed to resolve an inadequacy in the currently specified SR frequency. The proposed change revises the surveillance frequency note provided for SR's 3.6.1.4 and 3.6.1.5. The change assures that the most limiting secondary containment configuration is tested at a frequency not longer than 60 months, consistent with the original intent of the existing surveillance frequency note.

PPL Susquehanna, LLC has evaluated whether or not a significant hazards consideration is involved with the proposed change 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 or consequences of an accident previously evaluated?

Response: No.

The proposed change does not involve a significant increase in the probability of an accident previously evaluated because neither Secondary Containment nor the Standby Gas Treatment System is an initiator of an accident. Both mitigate accident consequences.

The consequences of a Design Basis Analysis-Loss of Coolant Accident (DBA-LOCA) have been evaluated in the FSAR. Revising the surveillance frequency to require the most limiting configurations to be tested with the 60-month period rather than just the three zone configuration provides assurance that the most limiting secondary containment configuration is tested every 60 months in accordance with the original intent of the surveillance frequency. The proposed change also provides added assurance of acceptable performance within the analysis assumptions of the FSAR. The radiological evaluation of DBA-LOCA doses, including doses offsite, control room habitability, and exposures for personnel are not impacted.

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 changes do not involve a physical alteration of the plant. No new or different type of equipment will be installed nor will there be changes in methods governing normal plant operation.

The potential for the loss of plant systems or equipment to mitigate the effects of an accident is not altered.

The proposed changes do not require any new operator response or introduce any new opportunities for operator error not previously considered.

Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Response: No.

The proposed change does not involve a significant reduction in margin of safety.

The surveillance test change ensures all the secondary containment configurations are tested within a 60-month period when only one configuration was previously required to be tested. This change has a positive effect on the margin of safety as it provides more restrictive testing requirement that will provide added assurance of acceptable secondary containment performance.

Based on the above, the PPL Susquehanna concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and accordingly, a finding of "no significant hazards consideration" is justified.

5.2 Applicable Regulatory Requirements / Criteria

5.2.1 Analysis

SSES FSAR Sections 3.1 and 3.13 provide detailed discussion of SSES compliance with the applicable regulatory requirements and guidance. The proposed TS amendment:

- (a) Does not alter the design or function of any reactivity control 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.

General Design Criteria:

GDC 16 "Containment Design" requires that secondary containment and the associated safety systems are designed and maintained so that offsite doses, which could result from postulated design basis accidents, remain below the guideline values stated in 10 CFR 100 when calculated by the methods of Regulatory Guide 1.3 (Rev. 2, 6/74).

The following applicable General Design Criteria (GDC) for the Standby Gas Treatment System require that containment atmosphere cleanup systems reduce the amount of radioactive material released to the environment following a postulated design basis accident.

- GDC 41 - Containment Atmosphere Cleanup
- GDC 42 - Inspection of Containment Atmosphere Systems
- GDC 43 - Testing of Containment Atmosphere Systems

Regulatory Guide 1.52:

Regulatory Guide 1.52 is titled "Design, Testing, and Maintenance Criteria for Engineered-Safety Feature Atmosphere Cleanup Air Filtration and Adsorption Units of Light-Water-Cooled Nuclear Power Plants." Regulatory Guide 1.52 addresses the atmosphere cleanup system, including the various components and ductwork, in a postulated design basis radiological accident environment.

Conformance with GDC 41, 42, and 43, as well as conformance with Regulatory Guide 1.52 are not affected by these proposed changes, because a recovery plan will be in place to restore the system to be functional, if an accident should occur.

Thus, the proposed change does not impact the conformance with the above General Design Criteria and regulatory guidance.

5.2.2 Conclusion

Based on the analyses provided in Section 4.0 Technical Analysis, the proposed changes are consistent with all applicable regulatory requirements and criteria. In conclusion, there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, such activities will be conducted in

compliance with the Commission's regulations, and the approval of the proposed change will not be inimical to the common defense and security or to the health and safety of the public.

6.0 ENVIRONMENTAL CONSIDERATION

10 CFR 51.22(c)(9) identifies certain licensing and regulatory actions that 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 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:

1. As demonstrated in the No Significant Consideration Evaluation, the proposed amendment does not involve a significant hazards consideration.
2. 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 modification or alteration of plant equipment (no new or different type of equipment will be installed) or change in methods governing normal plant operation.
3. There is no significant increase in individual or cumulative occupational radiation exposure. The proposed change does not involve any physical modification or alteration of plant equipment (no new or different type of equipment will be installed) or change in methods governing normal plant operation.

7.0 SUMMARY

The evaluation of the proposed Technical Specification change contained herein shows the following:

1. The proposed change meets the current regulation as discussed in Section 5.0, Regulatory Safety Analysis, under Applicable Regulatory Requirements/Criteria.

2. The proposed change is consistent with the defense-in-depth philosophy as discussed in Section 4.2, Deterministic Considerations.
3. Safety Margins are adequately maintained as discussed in Section 5.0, Regulatory Safety Analysis, under the No Significant Hazards Consideration.

Therefore, PPL Susquehanna has concluded that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operating in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

8.0 REFERENCES

1. Amendment No. 21 to Facility Operating License No. NPF-14 - Susquehanna Steam Electric Station, Unit 1 dated March 23, 1984.

ATTACHMENT 1 to PLA-5857

Proposed Technical Specification Change (Mark-Up)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.6.4.1.4 -----NOTE----- The maximum time allowed for secondary containment draw down is dependent on the secondary containment configuration.</p> <p>Verify each standby gas treatment (SGT) subsystem will draw down the secondary containment to ≥ 0.25 inch of vacuum water gauge in less than or equal to the maximum time allowed for the secondary containment configuration that is OPERABLE.</p>	<p>-----NOTE----- Once every 60 months testing will be performed in three zone configuration. ←</p> <p>24 months on a STAGGERED TEST BASIS</p>
<p>SR 3.6.4.1.5 -----NOTE----- The maximum flow allowed for maintaining secondary containment vacuum is dependent on the secondary containment configuration.</p> <p>Verify each SGT subsystem can maintain ≥ 0.25 inch of vacuum water gauge in the secondary containment for at least 1 hour at a flow rate less than or equal to the maximum flow rate permitted for the secondary containment configuration that is OPERABLE.</p>	<p>-----NOTE----- Once every 60 months testing will be performed in three zone configuration. ←</p> <p>24 months on a STAGGERED TEST BASIS</p>

Test each configuration at least one time every 60 months.

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.6.4.1.4 -----NOTE----- The maximum time allowed for secondary containment draw down is dependent on the secondary containment configuration.</p> <hr/> <p>Verify each standby gas treatment (SGT) subsystem will draw down the secondary containment to ≥ 0.25 inch of vacuum water gauge in less than or equal to the maximum time allowed for the secondary containment configuration that is OPERABLE.</p>	<p>-----NOTE----- Once every 60 months testing will be performed in three zone configuration.</p> <hr/> <p>24 months on a STAGGERED TEST BASIS</p>
<p>SR 3.6.4.1.5 -----NOTE----- The maximum flow allowed for maintaining secondary containment vacuum is dependent on the secondary containment configuration.</p> <hr/> <p>Verify each SGT subsystem can maintain ≥ 0.25 inch of vacuum water gauge in the secondary containment for at least 1 hour at a flow rate less than or equal to the maximum flow rate permitted for the secondary containment configuration that is OPERABLE.</p>	<p>-----NOTE----- Once every 60 months testing will be performed in three zone configuration.</p> <hr/> <p>24 months on a STAGGERED TEST BASIS</p>

Test each configuration at least one time every 60 months.

ATTACHMENT 2 to PLA-5857

**Proposed Technical Specification Bases Changes
(Provided for information)**

BASES

SURVEILLANCE REQUIREMENTS SR 3.6.4.1.4 and SR 3.6.4.1.5

Only one of the above listed configurations needs to be tested to confirm secondary containment OPERABILITY.

A Note also modifies the Frequency for each SR. This Note identifies that each SR ~~must be performed in the most limiting Secondary Containment Configuration every 60 months.~~ The 60 month Frequency is acceptable because operating experience has shown that these components usually pass the Surveillance and all active components are tested more frequently. Therefore, these tests are used to ensure secondary containment boundary integrity.

Since these SRs are secondary containment tests, they need not be performed with each SGT subsystem. The SGT subsystems are tested on a STAGGERED TEST BASIS, however, to ensure that in addition to the requirements of LCO 3.6.4.3, either SGT subsystem will perform SR 3.6.4.1.4 and SR 3.6.4.1.5. Operating experience has shown these components usually pass the Surveillance when performed at the 24 month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

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- REFERENCES**
1. FSAR, Section 6.2.3.
 2. FSAR, Section 15.6.
 3. FSAR, Section 15.7.4.
 4. Final Policy Statement on Technical Specifications Improvements, July 22, 1993 (58 FR 39132).
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configuration is to be tested every 60 months. Testing each configuration every 60 months assures that the most limiting configuration is tested every 60 months.

BASES

SURVEILLANCE REQUIREMENTS SR 3.6.4.1.4 and SR 3.6.4.1.5 (continued)

A Note also modifies the Frequency for each SR. This Note identifies that each SR must be performed in the most limiting Secondary Containment Configuration every 60 months. The 60 month Frequency is acceptable because operating experience has shown that these components usually pass the Surveillance and all active components are tested more frequently. Therefore, these tests are used to ensure secondary containment boundary integrity.

Since these SRs are secondary containment tests, they need not be performed with each SGT subsystem. The SGT subsystems are tested on a STAGGERED TEST BASIS, however, to ensure that in addition to the requirements of LCO 3.6.4.3, either SGT subsystem will perform SR 3.6.4.1.4 and SR 3.6.4.1.5. Operating experience has shown these components usually pass the Surveillance when performed at the 24 month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

- REFERENCES
1. FSAR, Section 6.2.3.
 2. FSAR, Section 15.6.
 3. FSAR, Section 15.7.4.
 4. Final Policy Statement on Technical Specifications Improvements, July 22, 1993 (58 FR 39132).

Configuration is to be tested every 60 months.
 Testing each configuration every 60 months assures that the most limiting configuration is tested every 60 months.