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March 9, 2005
RC-05-0041

Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555

ATTN: Ms. K. R. Cotton

Dear Sir / Madam:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
LICENSE AMENDMENT REQUEST - LAR 03-1931-24
ADOPTION OF TS TASK FORCE (TSTF) TRAVELER - 287, REVISION 5,
VENTILATION SYSTEM ENVELOPE ALLOWED OUTAGE TIME

- References:
- 1) W. D. Beckner (NRC) Letter to J. Davis (NEI), "Approval of Various TSTFs" dated March 16, 2000
 - 2) D. K. Atkinson (Energy Northwest) Letter to Document Control Desk (NRC), "License Amendment Request – Adoption of TS Task Force (TSTF) Traveler-287, Revision 5, Ventilation System Envelope Allowed Outage Time", dated April 19, 2004
 - 3) W. A. Macon, Jr. (NRC) Letter to J. V. Parrish (Northwest Energy), "Columbia Generating Station, Issuance Of Amendment, Re: Control Room Emergency Filtration (CREF) System (TAC NO. MC2650)", Dated July 26, 2004 (69 FR 51491, August 19, 2004)

Pursuant to 10 CFR 50.90, South Carolina Electric & Gas Company (SCE&G), acting for itself and as agent for South Carolina Public Service Authority, hereby requests an amendment to the Virgil C. Summer Nuclear Station (VCSNS) Technical Specifications (TS).

The proposed amendment revises TS 3/4.7.6, "Control Room Normal and Emergency Air Handling System" and associated Bases. Specifically, VCSNS proposes to revise TS 3/4.7.6 to provide an Action when the Control Room Normal and Emergency Air Handling System ventilation boundary is inoperable and a note that allows the ventilation boundary to be open, intermittently under administrative controls. The changes are consistent with Revision 5 of NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-287, "Ventilation System Envelope Allowed Outage Time." This TS improvement was approved by the NRC on March 16, 2000 (Reference 1).

SCE&G's evaluation of the proposed changes is provided in Attachment I to this letter. The attachment provides a description of the proposed changes and the regulatory basis for the changes. The proposed TS changes are presented in Attachments II and III. Implementation of TSTF-287 also involves changes to the TS Bases. Bases changes accompany the TS changes in Attachment II and III. New regulatory commitments associated with this request are provided in Attachment IV.

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SCE&G has determined that there are no significant hazards considerations associated with the proposed change and that the TS change qualifies for a categorical exclusion from environmental review pursuant to the provision of 10CFR51.22(c)(9).

The proposed amendment has been reviewed by the appropriate VCSNS review committees. SCE&G has notified the State of South Carolina in accordance with 10CFR50.91(b).

SCE&G requests that this amendment be processed as an exigent change. The change is needed to support control room ventilation tracer gas testing which is being performed to satisfy NRC Generic Letter 2003-01. The test is scheduled for March 21, 2005. Without the change, the plant may be forced into an unnecessary shutdown to repair potential control room envelope discrepancies that would otherwise be repairable on-line under the provisions of TSTF 287. Once approved, the amendment shall be implemented within 30 days. To facilitate the review and approval, this request was closely modeled after Northwest Energy's recent request (Reference 2) to adopt TSTF-287 for the Columbia Generating Station that the NRC approved on July 26, 2004, (Reference 3). Reference 2 in turn references several precedent cases of NRC approval for other licensees. The need for a prompt review of this request and the above requested approval date were discussed with the NRC's Project Manager for VCSNS on March 1, 2005.

There are no other TS changes in process that will affect or be affected by this change request. There are no significant changes to any FSAR or FPER sections.

If you have any questions or require additional information, please contact Mr. Ronald B. Clary at (803) 345-4757.

I certify under penalty of perjury that the information contained herein is true and correct.

3-9-05
Executed on


Jeffrey B. Archie

JT/JBA/dr

Enclosures:

Attachment(s): 4

- I. Evaluation of the proposed change
- II. Proposed Technical Specification and Bases Change - Mark-up
- III. Proposed Technical Specification and Bases Change - Retyped
- IV. List of Regulatory Commitments

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DMS (RC-05-0041)

**LICENSE AMENDMENT REQUEST - LAR 03-1931-24
ADOPTION OF TS TASK FORCE (TSTF) TRAVELER - 287, REVISION 5,
"VENTILATION SYSTEM ENVELOPE ALLOWED OUTAGE TIME"**

1.0 INTRODUCTION

The proposed amendment revises Virgil C. Summer Nuclear Station (VCSNS) Technical Specifications (TS) 3/4.7.6, "Control Room Normal and Emergency Air Handling System" and associated Bases. Specifically, VCSNS proposes to revise Limiting Condition for Operation (LCO) 3.7.6 to provide an Action when the Control Room Normal and Emergency Air Handling System ventilation boundary is degraded and a note that allows the ventilation boundary to be open, intermittently under administrative controls. The proposed changes are consistent with Revision 5 of Industry/Standard Technical Specification Task Force (TSTF) Improved Standard Technical Specification Change Traveler, TSTF-287, "Ventilation System Envelope Allowed Outage Time." This TS improvement was approved by the NRC by letter dated March 16, 2000.

2.0 DESCRIPTION OF PROPOSED AMENDMENT

Consistent with the NRC-approved Revision 5 of TSTF-287, the proposed TS changes include:

A Note is being added to LCO 3.7.6 that would allow the control room boundary to be opened intermittently under administrative controls. A new Condition/Action, applicable in Modes 1, 2, 3, and 4, is being added to LCO 3.7.6 to specify an Action with an allowed outage time of 24 hours to restore an inoperable control room boundary to OPERABLE status.

The associated TS Bases are revised by adding discussion to specify the necessary administrative controls to restore the control room boundary and the use of compensatory measures during the time period the control room boundary is inoperable.

The existing Condition/Actions and Bases are renumbered accordingly. Marked-up TS pages and TS Bases pages that show the specific changes are provided in Attachment II and III, respectively. The TS changes provided in TSTF-287, Revision 5, are proposed for adoption with no variances other than those differences in the proposed TS changes that result because the VCSNS TS do not match the format of the Improved Standard Technical Specifications for Westinghouse Plants. The VCSNS proposed TS changes incorporate the Conditions and Actions provided by the TSTF in one combined Action (i.e., Condition/Action) statement which is consistent with the NRC approved changes in TSTF-287, Revision 5. Plant-specific terminology (e.g., system name - Control Room Normal and Emergency Air Handling System) is substituted for the generic system name in the TSTF.

3.0 BACKGROUND

VCSNS has determined that tracer gas testing to address Generic Letter 2003-01 issues may create a condition that could result in exceeding the requirements of Technical Specifications (TS) for the Control Room Normal and Emergency Air Handling System. Specifically, VCSNS test activities may result in temporary breaches of Control Room Normal and Emergency Air Handling System ventilation boundaries.

The Control Room Normal and Emergency Air Handling System consists of two 100 percent capacity redundant fan and filter systems. Normally, one Control Room Normal and Emergency Air Handling System (Train) is in a standby alignment. During normal operation, the control room recirculation air flow is bypassed around the control room emergency filter plenum. Upon receipt of a Functional Unit 1 Engineered Safety Feature Actuation Signal or high radiation signal from RM-A1, the Control Room Normal and Emergency Air Handling System switches to emergency operation in which the recirculation air flow is routed through the emergency filter plenum. When operating in the emergency mode, the System supplies filtered, cooled or heated air to the control room, technical support center, and cable spreading area; maintains a 1/8" w.g. pressure inside the control room envelope, and recirculates the air through the emergency filters to remove radioactive contaminants. The ingress of gases, smoke or products of combustion (due to a fire within the plant but external to the control room), or of airborne radioactive contaminants released due to the design basis accident, is minimized by pressurizing the control room.

A TS Limiting Condition for Operation (LCO) is provided for the Control Room Normal and Emergency Air Handling System fan and filter subsystem. However, the Control Room Normal and Emergency Air Handling System envelopes several areas that rely on the Control Room Normal and Emergency Air Handling System ventilation boundary to maintain operability of the applicable system. There is no applicable LCO Action for conditions that breach Control Room Normal and Emergency Air Handling System boundaries. Therefore, any breach of the Control Room Normal and Emergency Air Handling System boundary currently requires entry into TS 3.0.3 (if in a mode requiring the applicable Control Room Normal and Emergency Air Handling System train to be operable) or requires immediate action to suspend fuel movement.

TSTF-287, Revision 5, was developed by the Westinghouse Owner's Group to provide an allowed out of service time for inoperability of TS emergency exhaust ventilation systems due solely to an inoperable ventilation boundary. Additionally, a note is proposed to allow ventilation boundaries to be open under administrative controls. The justification for this proposed change is that these changes are acceptable based on the low probability of a design basis accident occurring during the 24 hour completion time and compensatory measures available to minimize dose consequences of an event during this time.

4.0 TECHNICAL ANALYSIS

If the control room boundary is inoperable in MODES 1, 2, 3, or 4 such that the Control Room Normal and Emergency Air Handling System trains cannot establish or maintain the required control room pressure, this TS change will require action be taken to restore an OPERABLE control room boundary within 24 hours. The 24 hour Completion Time is reasonable based on the low probability of a design basis accident occurring during this time period and compensatory measures available to the operator to minimize the consequences of potential hazards. Additionally, LCO 3.7.6 is modified by a Note that allows the control room boundary to be opened intermittently under administrative controls. For entry and exit through doors, the administrative control of the opening is performed by the person(s) entering or exiting the area. For other openings, a dedicated individual, who is in continuous communication with the control room, is stationed at the opening. This individual will have a method to rapidly close the opening when a need for control room boundary integrity is required.

As indicated, the proposed TS changes allow 24 hours (during operation in MODES 1, 2, 3, and 4) for an inoperable control room boundary to be restored before the initiation of an orderly shutdown is required. During the period that the control room boundary is inoperable, appropriate compensatory measures consistent with the intent of 10 CFR 50 Appendix A, General Design Criterion (GDC) 19 will be utilized to protect control room personnel from potential hazards such as radiation, radioactive contamination, toxic chemicals, smoke, temperature, relative humidity, and to ensure physical security. The preplanned measures will be available to address these concerns for intentional and unintentional entry into proposed new LCO Condition/Action a.2. SCE&G will have approved written procedures in place that describe the compensatory measures to be taken in the event of an intentional or unintentional entry into LCO Condition/Action a.2. A regulatory commitment to this effect is provided in Attachment IV.

In summary, the proposed change is considered acceptable due to the low probability of an event occurring during the allowed outage time that would require an intact control room boundary, and by the use of compensatory measures.

5.0 REGULATORY SAFETY ANALYSIS

5.1 No Significant Hazards Consideration

South Carolina Electric & Gas Company (SCE&G) has evaluated the proposed changes to the VCSNS TS described above against the significant hazards criteria of 10CFR50.92 and has determined that the changes do not involve any significant hazard. The following is provided in support of this conclusion.

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

Response: No

The proposed TS change involves the Control Room Normal and Emergency Air Handling System and associated control room ventilation boundary, which provide a radiological controlled environment from which the plant can be operated following a design basis accident (DBA). The Control Room Normal and Emergency Air Handling System and the control room ventilation boundary are not assumed to be initiators of any analyzed accident and do not affect the probability of accidents. The proposed change adds a Note to LCO 3.7.6 that allows the control room boundary to be opened intermittently under administrative controls. A new LCO Condition/Action a.2 is also added to LCO 3.7.6 to specify a Completion Time of 24 hours to restore an inoperable control room boundary to OPERABLE status before requiring the plant to perform an orderly shutdown. The 24 hour Completion Time is reasonable based on the low probability of a DBA occurring during this time period and SCE&G's commitment to implement, via administrative controls, appropriate compensatory measures consistent with the intent of 10 CFR 50, Appendix A, General Design Criteria (GDC) 19. These compensatory measures will serve to minimize the consequences of an open control room boundary and ensure the Control Room Normal and Emergency Air Handling System can continue to perform its function. As such, these changes will not affect the function or operation of any other systems, structures, or components. Therefore, the proposed TS change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

Response: No

The proposed change adds a Note to LCO 3.7.6 that allows the control room boundary to be opened intermittently under administrative controls. A new Condition/Action a.2 is also added to LCO 3.7.6 to specify a Completion Time of 24 hours to restore an inoperable control room boundary to OPERABLE status before requiring the plant to perform an orderly shutdown. The Control Room Normal and Emergency Air Handling System and the control room boundary are designed to protect the habitability of the control room. The Control Room Normal and Emergency Air Handling System and the control room boundary are not accident initiators. This change is administrative in nature and does not involve any physical changes to the plant. Therefore, the proposed TS change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Response: No

The proposed change adds a Note to LCO 3.7.6 that allows the control room boundary to be opened intermittently under administrative controls. A new Condition/Action a.2 is also added to LCO 3.7.6 to specify a Completion Time of 24 hours to restore an inoperable control room boundary to OPERABLE status before requiring the plant to perform an orderly shutdown. The 24 hour Completion Time is reasonable based on the low probability of a DBA occurring during this time period and SCE&G's commitment to implement, via administrative controls, appropriate compensatory measures consistent with the intent of 10 CFR 50, Appendix A, GDC 19. These compensatory measures will serve to minimize the consequences of an open control room boundary and assure that the Control Room Normal and Emergency Air Handling System can continue to perform its function. Therefore, the proposed TS change does not involve a significant reduction in the margin of safety.

Based on the above, SCE&G concludes that the proposed amendment 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

The proposed changes would allow 24 hours (during MODES 1, 2, 3, or 4) to restore the capability to maintain control room boundary differential pressure before requiring the unit to perform an orderly shutdown, and would also allow intermittent opening of the control room boundary under administrative controls. During the period that the control room boundary is inoperable, appropriate compensatory measures consistent with the intent of 10 CFR Part 50, Appendix A, GDC 19 will be utilized to protect the control room operators from potential hazards such as radioactive contamination, toxic chemicals, smoke, temperature, relative humidity, and to ensure physical security. These preplanned compensatory measures will be available to address these concerns for intentional and unintentional entry into Condition/Action a.2.

The proposed change is considered acceptable because of the low probability of an event requiring an intact control room boundary during the 24 hour Completion Time associated with the new Condition/Action a.2. Based on the low probability of an event occurring in this time and the availability of compensatory measures consistent with GDC 19 to minimize the consequences during an event, the proposed change is considered acceptable and is in conformance with NRC-approved TSTF-287, Revision 5. 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 the health and safety of the public.

6.0 ENVIRONMENTAL CONSIDERATION

SCE&G has determined that the proposed amendment would change requirements with respect to the installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. SCE&G has evaluated the proposed change and has determined that the change does not involve, (i) a significant hazards consideration, (ii) a significant change in the types of or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. As discussed above, the proposed changes do not involve a significant hazards consideration. Accordingly, the proposed change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51, specifically 10 CFR 51.22(c)(9). Therefore, pursuant 10 CFR 51.22(b), an environmental assessment of the proposed change is not required.

7.0 PRECEDENT

This license amendment request is being made in accordance with TSTF-287. SCE&G is not proposing variations or deviations from the TS changes described in TSTF-287 other than those differences in the proposed TS changes that result because the VCSNS TS do not match the format of the Improved Standard Technical Specifications for Westinghouse Plants. The VCSNS proposed TS changes incorporate the Conditions and Actions provided by the TSTF in one combined Action (i.e., Condition/Action) statement which is consistent with the NRC approved changes in TSTF-287, Revision 5.

Similar TS changes have been approved by the NRC for a number of Pressurized Water Reactors and several BWRs, including Harris, Hatch, Fermi, Susquehanna, Browns Ferry, and Columbia Generating Station. Additionally, following approval by the NRC, it is intended that TSTFs be incorporated by individual licensees as changes to their respective TS. Thus, in proposing incorporation of this TSTF, SCE&G is increasing consistency of VCSNS TS with the latest approved changes and improvements endorsed by the industry and approved by the NRC.

8.0 ATTACHMENT I REFERENCES

1. Technical Specifications Task Force (TSTF) Change Traveler 287, Revision 5, "Ventilation System Envelope Allowed Outage Time"
2. Letter dated March 16, 2000, WD Beckner (NRC) to J Davis (NEI), "Approval of several TSTFs including TSTF-287, Revision 5"
3. 10 CFR 20
4. 10 CFR 51

ATTACHMENT II

PROPOSED TECHNICAL SPECIFICATION CHANGES (MARK-UP)

Attachment to License Amendment No. XXX
To Facility Operating License No. NPF-12
Docket No. 50-395

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

<u>Remove Pages</u>	<u>Insert Pages</u>
3/4 7-14	3/4 7-14
B 3/4 7-4	B 3/4 7-4
B 3/4 7-5	B 3/4 7-5

SCE&G -- EXPLANATION OF CHANGES

<u>Page</u>	<u>Affected Section</u>	<u>Bar #</u>	<u>Description of Change</u>	<u>Reason for Change</u>
3/4 7-14	3.7.6	1	Insert asterisk following LCO 3.7.6 statement to identify footnote.	Incorporate guidance TSTF-287.
		2	Identify Modes 1, 2, 3, and 4 as Action "a."	Addition of condition action for control room boundary breach creates multiple conditions for Modes 1, 2, 3, and 4.
		3	Individually identify existing condition action.	To identify the action associated with the existing condition in TS 3/4.7.6.
		4	Add condition action to address breach of control room boundary.	Incorporate guidance TSTF-287.
		5	Identify Modes 5 and 6 as Action "b."	Changed to provide uniform sequence with Modes 1-4.
		6	Change "a." to "1."	Provide consistency in condition action identification.
		7	Change "b." to "2."	Provide consistency in condition action identification
		8	Change "c." to "3."	Provide consistency in condition action identification
		9	Add Footnote	Incorporate guidance TSTF-287.
B 3/4 7-4	3/4.7.6.	1	Insert discussion on control room breach and compensatory measures	Incorporate guidance TSTF-287.
B 3/4 7-5			Text inserted from previous page.	Added text to previous page.

PLANT SYSTEMS

3/4.7.6 CONTROL ROOM NORMAL AND EMERGENCY AIR HANDLING SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.6 Two independent control room normal and emergency air handling systems shall be OPERABLE.*

APPLICABILITY: ALL MODES

ACTION:

a. MODES 1, 2, 3 and 4:

1. With one control room normal and emergency air handling system inoperable, restore the inoperable system to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

INSERT 2 →

b. MODES 5 and 6:

1. a. With one control room normal and emergency air handling system inoperable, restore the inoperable system to OPERABLE status within 7 days or initiate and maintain operation of the remaining OPERABLE control room emergency air cleanup system in the recirculation mode.

2. b. With both control room emergency air cleanup systems inoperable, or with the OPERABLE control room emergency air cleanup system, required to be in the recirculation mode by ACTION (a), not capable of being powered by an OPERABLE emergency power source, suspend all operations involving CORE ALTERATIONS or positive reactivity changes.

3. c. The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.6 Each control room normal and emergency air handling system shall be demonstrated OPERABLE:

- a. At least once per 12 hours by verifying that the control room air temperature is less than or equal to 85°F.
- b. At least once per 31 days on a STAGGERED TEST BASIS by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the system operates for at least 15 minutes.
- c. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the system by:

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

INSERT 2.

2. With both control room normal and emergency air handling systems inoperable due to an inoperable control room boundary, restore the control room boundary to OPERABLE status within 24 hours. Otherwise be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

PLANT SYSTEMS

BASES

ULTIMATE HEAT SINK (Continued)

The limitations on minimum water level and maximum temperature are based on providing a 30 day cooling water supply to safety related equipment without exceeding their design basis temperature and is consistent with the recommendations of Regulatory Guide 1.27, "Ultimate Heat Sink for Nuclear Plants", March 1974.

3/4.7.6 CONTROL ROOM NORMAL AND EMERGENCY AIR HANDLING SYSTEM

The OPERABILITY of the control room ventilation system ensures that 1) the ambient air temperature does not exceed the allowable temperature for continuous duty rating for the equipment and instrumentation cooled by this system and 2) the control room will remain habitable for operations personnel during and following all credible accident conditions. The OPERABILITY of this system in conjunction with control room design provisions is based on limiting the radiation exposure to personnel occupying the control room to 5 rem or less whole body, or its equivalent. This limitation is consistent with the requirements of General Design Criteria 19 of Appendix "A", 10 CFR 50.

3/4.7.7 SNUBBERS

All snubbers on systems required for safe shutdown/accident mitigation shall be OPERABLE. This includes safety and non-safety related snubbers on systems used to protect the code boundary and to ensure the structural integrity of these systems under dynamic loads.

Snubbers are classified and grouped by design and manufacturer but not by size. For example, mechanical snubbers utilizing the same design features of the 2 kip, 10 kip and 100 kip capacity manufactured by company "A" are of the same type. The same design mechanical snubber manufactured by company "B" for the purposes of this specification would be of a different type, as would hydraulic snubbers from either manufacturer.

The visual inspection frequency is based upon maintaining a constant level of snubber protection to systems. Therefore, the required inspection interval varies inversely with the observed snubber failures and is determined by the number of inoperable snubbers found during an inspection. Table 4.7-2 establishes three limits for determining the next visual inspection interval. Inspections performed before that interval has elapsed may be used as a new reference point to determine the next inspection. Any inspection whose results require a shorter inspection interval will override the previous schedule.

INSERT B

The control room boundary may be opened intermittently under administrative controls. For entry and exit through doors, the administrative control of the opening is performed by the person(s) entering and exiting the area. For other openings, these controls consist of stationing a dedicated individual at the opening who is in continuous communication with the control room. This individual will have a method to rapidly close the opening when a need for control room boundary integrity is required.

If the control room boundary is inoperable in MODES 1, 2, 3 or 4, the Control Room Normal and Emergency Air Handling System trains cannot perform their intended functions. Actions must be taken to restore an OPERABLE control room boundary within 24 hours. During the period that the control room boundary is inoperable, appropriate compensatory measures (consistent with the intent of GDC 19) should be utilized to protect control room operators from potential hazards such as radioactive contamination, toxic chemicals, smoke, temperature and relative humidity and physical security. Preplanned measures should be available to address these concerns for intentional and unintentional entry into the condition. The 24 hour Completion Time is reasonable based on the low probability of a DBA occurring during the time period, and the use of supplemental mitigating actions. The 24 hour Completion Time is typically a reasonable time to diagnose, plan and possibly repair, and test most problems with the control room boundary.

PLANT SYSTEMS

FOR REPAGINATION PURPOSES ONLY

BASES

SNUBBERS (Continued)

To provide assurance of snubber functional reliability one of two sampling and acceptance criteria methods are used:

- 1) functionally test 10 percent of a type of snubber with an additional 10 percent tested for each functional testing failure, or
- 2) functionally test a sample size and determine sample acceptance using Figure 4.7-1.

Figure 4.7-1 was developed using "Wald's Sequential Probability Ratio Plan" as described in "Quality Control and Industrial Statistics" by Acheson J. Duncan.

The service life of a snubber is established via manufacturer input and information through consideration of the snubber service conditions and associated installation and maintenance records (newly installed snubber, seal replaced, spring replaced, in high radiation area, in high temperature area, etc. . .). The requirement to monitor the snubber service life is included to ensure that the snubbers periodically undergo a performance evaluation in view of their age and operating conditions. These records will provide statistical bases for future consideration of snubber service life. The requirements for the maintenance of records and the snubber service life review are not intended to affect plant operation.

Permanent or other exemptions from the surveillance program for individual snubbers may be granted by the Commission if a justifiable basis for exemption is presented and, if applicable, snubber life destructive testing was performed to qualify the snubber for the applicable design conditions at either the completion of their fabrication or at a subsequent date. Snubbers so exempted shall be listed in Section 3.7.7 with footnotes indicating the extent of the exemptions.

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ATTACHMENT III

PROPOSED TECHNICAL SPECIFICATION CHANGES (RETYPE)

PLANT SYSTEMS

3/4.7.6 CONTROL ROOM NORMAL AND EMERGENCY AIR HANDLING SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.6 Two independent control room normal and emergency air handling systems shall be OPERABLE.*

APPLICABILITY: ALL MODES

ACTION:

a. MODES 1, 2, 3 and 4:

1. With one control room normal and emergency air handling system inoperable, restore the inoperable system to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
2. With both control room normal and emergency air handling systems inoperable due to an inoperable control room boundary, restore the control room boundary to OPERABLE status within 24 hours. Otherwise be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

b. MODES 5 and 6:

1. With one control room normal and emergency air handling system inoperable, restore the inoperable system to OPERABLE status within 7 days or initiate and maintain operation of the remaining OPERABLE control room emergency air cleanup system in the recirculation mode.
2. With both control room emergency air cleanup systems inoperable, or with the OPERABLE control room emergency air cleanup system, required to be in the recirculation mode by ACTION (a), not capable of being powered by an OPERABLE emergency power source, suspend all operations involving CORE ALTERATIONS or positive reactivity changes.
3. The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.6 Each control room normal and emergency air handling system shall be demonstrated OPERABLE:

- a. At least once per 12 hours by verifying that the control room air temperature is less than or equal to 85°F.
- b. At least once per 31 days on a STAGGERED TEST BASIS by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the system operates for at least 15 minutes.
- c. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the system by:

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

PLANT SYSTEMS

BASES

ULTIMATE HEAT SINK (Continued)

The limitations on minimum water level and maximum temperature are based on providing a 30 day cooling water supply to safety related equipment without exceeding their design basis temperature and is consistent with the recommendations of Regulatory Guide 1.27, "Ultimate Heat Sink for Nuclear Plants", March 1974.

3/4.7.6 CONTROL ROOM NORMAL AND EMERGENCY AIR HANDLING SYSTEM

The OPERABILITY of the control room ventilation system ensures that 1) the ambient air temperature does not exceed the allowable temperature for continuous duty rating for the equipment and instrumentation cooled by this system and 2) the control room will remain habitable for operations personnel during and following all credible accident conditions. The OPERABILITY of this system in conjunction with control room design provisions is based on limiting the radiation exposure to personnel occupying the control room to 5 rem or less whole body, or its equivalent. This limitation is consistent with the requirements of General design Criteria 19 of Appendix "A", 10 CFR 50.

The control room boundary may be opened intermittently under administrative controls. For entry and exit through doors, the administrative control of the opening is performed by the person(s) entering and exiting the area. For other openings, these controls consist of stationing a dedicated individual at the opening who is in continuous communication with the control room. This individual will have a method to rapidly close the opening when a need for control room boundary integrity is required.

If the control room boundary is inoperable in MODES 1, 2, 3, or 4, the Control Room Normal and Emergency Air Handling System trains cannot perform their intended functions. Actions must be taken to restore an OPERABLE control room boundary within 24 hours. During the period that the control room boundary is inoperable, appropriate compensatory measures (consistent with the intent of GDC 19) should be utilized to protect control room operators from potential hazards such as radioactive contamination, toxic chemicals, smoke, temperature and relative humidity and physical security. Preplanned measures should be available to address these concerns for intentional and unintentional entry into the condition. The 24-hour Completion Time is reasonable based on the low probability of a DBA occurring during the time period, and the use of supplemental mitigating actions. The 24-hour Completion Time is typically a reasonable time to diagnose, plan and possibly repair, and test most problems with the control room boundary.

3/4.7.7 SNUBBERS

All snubbers on systems required for safe shutdown/accident mitigation shall be OPERABLE. This includes safety and non-safety related snubbers on systems used to protect the code boundary and to ensure the structural integrity of these systems under dynamic loads.

PLANT SYSTEMS

BASES

SNUBBERS (Continued)

Snubbers are classified and grouped by design and manufacturer but not by size. For example, mechanical snubbers utilizing the same design features of the 2 kip, 10 kip and 100 kip capacity manufactured by company "A" are of the same type. The same design mechanical snubber manufactured by company "B" for the purposes of this specification would be of a different type, as would hydraulic snubbers from either manufacturer.

The visual inspection frequency is based upon maintaining a constant level of snubber protection to systems. Therefore, the required inspection interval varies inversely with the observed snubber failures and is determined by the number of inoperable snubbers found during an inspection. Table 4.7-2 establishes three limits for determining the next visual inspection interval. Inspections performed before that interval has elapsed may be used as a new reference point to determine the next inspection. Any inspection whose results require a shorter inspection interval will override the previous schedule.

To provide assurance of snubber functional reliability one of two sampling and acceptance criteria methods are used:

- 1) functionally test 10 percent of a type of snubber with an additional 10 percent tested for each functional testing failure, or
- 2) functionally test a sample size and determine sample acceptance using Figure 4.7-1.

Figure 4.7-1 was developed using "Wald's Sequential Probability Ratio Plan" as described in "Quality Control and Industrial Statistics" by Acheson J. Duncan.

The service life of a snubber is established via manufacturer input and information through consideration of the snubber service conditions and associated installation and maintenance records (newly installed snubber, seal replaced, spring replaced, in high radiation area, in high temperature area, etc. . .). The requirement to monitor the snubber service life is included to ensure that the snubbers periodically undergo a performance evaluation in view of their age and operating conditions. These records will provide statistical bases for future consideration of snubber service life. The requirements for the maintenance of records and the snubber service life review are not intended to affect plant operation.

Permanent or other exemptions from the surveillance program for individual snubbers may be granted by the Commission if a justifiable basis for exemption is presented and, if applicable, snubber life destructive testing was performed to qualify the snubber for the applicable design conditions at either the completion of their fabrication or at a subsequent date. Snubbers so exempted shall be listed in Section 3.7.7 with footnotes indicating the extent of the exemptions.

ATTACHMENT IV

LIST OF REGULATORY COMMITMENTS

During the period that the control room boundary is inoperable, appropriate compensatory measures consistent with the intent of 10 CFR 50 Appendix A, General Design Criterion (GDC) 19 will be utilized to protect control room personnel from potential hazards such as radiation, radioactive contamination, toxic chemicals, smoke, temperature, relative humidity, and to ensure physical security. The preplanned measures will be available to address these concerns for intentional and unintentional entry into proposed new Condition/Action a.2. SCE&G will have approved written procedures in place that describe the compensatory measures to be taken in the event of an intentional or unintentional entry into Condition/Action a.2.

These procedures will be effective upon implementation of the associated License Amendment.