

3.6 CONTAINMENT SYSTEMS

3.6.14 Divider Barrier Integrity

LCO 3.6.14 Divider barrier integrity shall be maintained.

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

**ACTIONS**

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>A. -----NOTE----- For this action, separate Condition entry is allowed for each personnel access door or equipment hatch. ----- One or more personnel access doors or equipment hatches (other than one pressurizer enclosure hatch addressed by Condition D) open or inoperable, other than for personnel transit entry.</p>	<p>A.1 Restore personnel access doors and equipment hatches to OPERABLE status and closed positions.</p>	<p>1 hour</p>
<p>B. Divider barrier seal inoperable.</p>	<p>B.1 Restore seal to OPERABLE status.</p>	<p>1 hour</p>
<p>C. Required Action and associated Completion Time not met.</p>	<p>C.1 Be in MODE 3. <u>AND</u> C.2 Be in MODE 5.</p>	<p>6 hours  36 hours</p>
<p>D. One pressurizer enclosure hatch open or inoperable.</p>	<p>D.1 Restore pressurizer enclosure hatch to OPERABLE status and closed position.</p>	<p>6 hours</p>

## B 3.6 CONTAINMENT SYSTEMS

### B 3.6.14 Divider Barrier Integrity

#### BASES

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#### BACKGROUND

The divider barrier consists of the operating deck and associated seals, personnel access doors, and equipment hatches that separate the upper and lower containment compartments. Divider barrier integrity is necessary to minimize bypassing of the ice condenser by the hot steam and air mixture released into the lower compartment during a Design Basis Accident (DBA). This ensures that most of the gases pass through the ice bed, which condenses the steam and limits pressure and temperature during the accident transient. Limiting the pressure and temperature reduces the release of fission product radioactivity from containment to the environment in the event of a DBA.

In the event of a DBA, the ice condenser inlet doors (located below the operating deck) open due to the pressure rise in the lower compartment. This allows air and steam to flow from the lower compartment into the ice condenser. The resulting pressure increase within the ice condenser causes the intermediate deck doors and the door panels at the top of the condenser to open, which allows the air to flow out of the ice condenser into the upper compartment. The ice condenses the steam as it enters, thus limiting the pressure and temperature buildup in containment. The divider barrier separates the upper and lower compartments and ensures that the steam is directed into the ice condenser. The ice, together with the containment spray, is adequate to absorb the initial blowdown of steam and water from a DBA as well as the additional heat loads that would enter containment over several hours following the initial blowdown. The additional heat loads would come from the residual heat in the reactor core, the hot piping and components, and the secondary system, including the steam generators. During the post blowdown period, the Air Return System (ARS) returns upper compartment air through the divider barrier to the lower compartment. This serves to equalize pressures in containment and to continue circulating heated air and steam from the lower compartment through the ice condenser, where the heat is removed by the remaining ice.

Divider barrier integrity ensures that the high energy fluids released during a DBA would be directed through the ice condenser and that the ice condenser would function as designed if called upon to act as a passive heat sink following a DBA.

**BASES**

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**APPLICABLE SAFETY ANALYSES**

Divider barrier integrity ensures the functioning of the ice condenser to the limiting containment pressure and temperature that could be experienced following a DBA. The limiting DBAs considered relative to containment temperature and pressure are the loss of coolant accident (LOCA) and the steam line break (SLB). The LOCA and SLB are analyzed using computer codes designed to predict the resultant containment pressure and temperature transients. DBAs are assumed not to occur simultaneously or consecutively.

Although the ice condenser is a passive system that requires no electrical power to perform its function, the Containment Spray System, RHR Spray System, and the ARS also function to assist the ice bed in limiting pressures and temperatures. Therefore, the postulated DBAs are analyzed, with respect to containment Engineered Safety Feature (ESF) systems, assuming the loss of one ESF bus, which is the worst case single active failure and results in the inoperability of one train in the Containment Spray System, RHR Spray System, and the ARS. Additionally, a 5.0 ft<sup>2</sup> opening is conservatively assumed to exist in the divider plate in the LOCA and SLB DBA analyses.

The limiting DBA analyses (Ref. 1) show that the maximum peak containment pressure results from the LOCA analysis and is calculated to be less than the containment design pressure. The maximum peak containment temperature results from the SLB analysis and is discussed in the Bases for LCO 3.6.5, "Containment Air Temperature."

In addition to calculating the overall peak containment pressures, the DBA analyses include calculation of the transient differential pressures that occur across subcompartment walls during the initial blowdown phase of the accident transient. The internal containment walls and structures are designed to withstand these local transient pressure differentials for the limiting DBAs.

The divider barrier satisfies Criterion 3 of 10 CFR 50.36 (Ref. 2).

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**LCO**

This LCO establishes the minimum equipment requirements to ensure that the divider barrier performs its safety function of ensuring that bypass leakage, in the event of a DBA, does not exceed the bypass leakage assumed in the accident analysis. Included are the requirements that the personnel access doors and equipment hatches in the divider barrier are OPERABLE and closed and that the divider barrier seal is properly installed and has not degraded with time. An exception to the requirement that the doors be closed is made to allow personnel transit entry through the divider barrier. The basis of this exception is the

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**LCO (continued)**

assumption that, for personnel transit, the time during which a door is open will be short (i.e., shorter than the Completion Time of 1 hour for Condition A). The divider barrier functions with the ice condenser to limit the pressure and temperature that could be expected following a DBA.

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**APPLICABILITY**

In MODES 1, 2, 3, and 4, a DBA could cause an increase in containment pressure and temperature requiring the integrity of the divider barrier. Therefore, the LCO is applicable in MODES 1, 2, 3, and 4.

The probability and consequences of these events in MODES 5 and 6 are low due to the pressure and temperature limitations of these MODES. As such, divider barrier integrity is not required in these MODES.

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**ACTIONS**

A.1

If one or more personnel access doors or equipment hatches (other than one pressurizer enclosure hatch addressed by Condition D) are open or inoperable, except for personnel transit entry, 1 hour is allowed to restore the door(s) and equipment hatches to OPERABLE status and the closed position. The 1 hour Completion Time is consistent with LCO 3.6.1, "Containment," which requires that containment be restored to OPERABLE status within 1 hour. Personnel access doors or equipment hatches open or inoperable in accordance with Condition A are not included in the ice condenser steam bypass analysis that provides the basis for Condition D. Conditions A and D are each implemented independently.

Condition A has been modified by a Note to provide clarification that, for this LCO, separate Condition entry is allowed for each personnel access door or equipment hatch.

B.1

If the divider barrier seal is inoperable, 1 hour is allowed to restore the seal to OPERABLE status. The 1 hour Completion Time is consistent with LCO 3.6.1, which requires that containment be restored to OPERABLE status within 1 hour.

C.1 and C.2

If divider barrier integrity cannot be restored to OPERABLE status within the required Completion Time, the plant must be brought to a MODE in

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**BASES**

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**ACTIONS (continued)**

which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

**D.1**

If a pressurizer enclosure hatch is open or inoperable, 6 hours are allowed to restore the hatch to OPERABLE status and in the closed position. The 6 hour completion time is based on the need to perform inspections and maintenance in the pressurizer compartment during power operation, as well as for personnel safety and radiation safety considerations. An analysis has been performed that shows an open hatch of 7.5 ft<sup>2</sup> bypass area during a DBA does not impact the design pressure or temperature of the containment. The 7.5 ft<sup>2</sup> bypass is in addition to the total operating deck leakage discussed in Ref. 1 (approximately 5 ft<sup>2</sup> for Unit 2 and 4.6 ft<sup>2</sup> for Unit 1). There is one pressurizer enclosure hatch on Unit 1 and there are three on Unit 2. These hatches are concrete plugs which must be removed with a crane to access the pressurizer cavity. The analyses supporting Condition D for steam bypassing the ice condenser and the heavy load drop apply to the removal of one pressurizer enclosure hatch at a time. The analyses were both done in a manner that bounds the largest of the hatches. The analysis supporting Condition D for steam bypassing the ice condenser does not include the personnel access doors or equipment hatches open or inoperable in accordance Condition A. Conditions A and D are each implemented independently.

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**SURVEILLANCE  
REQUIREMENTS**

**SR 3.6.14.1**

Verification, by visual inspection, that all personnel access doors and equipment hatches between the upper and lower containment compartments are closed provides assurance that divider barrier integrity is maintained prior to the reactor being taken from MODE 5 to MODE 4. This SR is necessary because many of the doors and hatches may have been opened for maintenance during the shutdown.

**SR 3.6.14.2**

Verification, by visual inspection, that the personnel access door and equipment hatch seals, sealing surfaces, and alignments are acceptable provides assurance that divider barrier integrity is maintained. This

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**SURVEILLANCE REQUIREMENTS (continued)**

inspection cannot be made when the door or hatch is closed. Therefore, SR 3.6.14.2 is required for each door or hatch that has been opened, prior to the final closure. Some doors and hatches may not be opened for long periods of time. Those that use resilient materials in the seals must be opened and inspected at least once every 10 years to provide assurance that the seal material has not aged to the point of degraded performance. The Frequency of 10 years is based on the known resiliency of the materials used for seals, the fact that the openings have not been opened (to cause wear), and operating experience that confirms that the seals inspected at this Frequency have been found to be acceptable.

**SR 3.6.14.3**

Verification, by visual inspection, after each opening of a personnel access door or equipment hatch that it has been closed makes the operator aware of the importance of closing it and thereby provides additional assurance that divider barrier integrity is maintained while in applicable MODES.

**SR 3.6.14.4**

Conducting periodic physical property tests on divider barrier seal test coupons provides assurance that the seal material has not degraded in the containment environment, including the effects of irradiation with the reactor at power. The required tests include a tensile strength test. The Frequency of 18 months was developed considering such factors as the known resiliency of the seal material used, the inaccessibility of the seals and absence of traffic in their vicinity, and the unit conditions needed to perform the SR. Operating experience has shown that these components usually pass the Surveillance when performed at the 18 month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

**SR 3.6.14.5**

Visual inspection of the seal around the perimeter provides assurance that the seal is properly secured in place. The Frequency of 18 months was developed considering such factors as the inaccessibility of the seals and absence of traffic in their vicinity, the strength of the bolts and mechanisms used to secure the seal, and the unit conditions needed to perform the SR. Operating experience has shown that these components usually pass the Surveillance when performed at the 18 month

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**SURVEILLANCE REQUIREMENTS (continued)**

Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

**REFERENCES**

1. UFSAR, Section 6.2.
2. 10 CFR 50.36, Technical Specifications, (c)(2)(ii).