

SEP 21 2005

LR-N05-0479
LCR S04-07



United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

**SUPPLEMENT TO REQUEST FOR CHANGE TO TECHNICAL
SPECIFICATIONS TO ADD REQUIREMENTS FOR STEAM GENERATOR
TUBE INTEGRITY, STEAM GENERATOR PROGRAM, AND STEAM
GENERATOR TUBE INSPECTION REPORT AND TO REVISE REACTOR
COOLANT SYSTEM OPERATIONAL LEAKAGE REQUIREMENTS
SALEM GENERATING STATION - UNIT 1
DOCKET NO. 50-272
FACILITY OPERATING LICENSE NO. DPR-70**

References: LR-N05-0018, "Request for Change to Technical Specifications to Add Requirements for Steam Generator Tube Integrity, Steam Generator Program, and Steam Generator Tube Inspection Report and to Revise Reactor Coolant System Operational Leakage Requirements," dated February 23, 2005

LR-N05-0373, "Supplement to Request for Change to Technical Specifications to Add Requirements for Steam Generator Tube Integrity, Steam Generator Program, and Steam Generator Tube Inspection Report and to Revise Reactor Coolant System Operational Leakage Requirements," dated August 2, 2005

By letter dated February 23, 2005 and supplemented by letter dated August 2, 2005, PSEG Nuclear LLC (PSEG) submitted a proposed Technical Specification (TS) amendment for Salem Generating Station Unit 1. The proposed amendment added requirements for Steam Generator Tube Integrity, Steam Generator Program, Steam Generator Tube Inspection Report, and revised the Reactor Coolant System Operational Leakage Requirements.

A telephone conference was conducted on September 16, 2005 to discuss several editorial changes and the compliance to TSTF-449. Based on these discussions, PSEG agreed to change previously submitted TS pages. Attachment 1 describes the changes. Attachment 2 provides a final complete set of all Technical Specifications and associated Bases pages that fully reflect the changes described in Attachment 1.

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Should you have any questions regarding this request, please contact Mr. Steve Mannon at (856) 339-1129.

Sincerely,



for Thomas P. Joyce
Site Vice President
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Attachment

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Changes to Previously Submitted Technical Specification (TS) Pages

1. TS definition 1.18 on page 1-4 was changed by Amendment 264 after the Steam Generator Program change was submitted by letter dated February 23, 2005 to reflect TSTF-449 Revision 3, and therefore does not include the most recent definition of Operable. Our letter submitted on August 2, 2005 to incorporate TSTF-449 Revision 4 changes did not require any changes to TS definitions. Attachment 2 to this letter provides TS page 1-4, as revised by Amendment 264, to reflect the changes proposed by this request.
2. TS LCO 3.4.6.2 on page 3/4 4-15 was changed to insert the word "and" at the end of item c.
3. TS 6.9.1.10 on page 6-24a was revised to use HOT SHUTDOWN instead of MODE 4. Also, the "and" at the end of item g was moved to the end of item f, and a period replaced the comma after testing on item g.
4. TS BASES 3/4.4.5, "Steam Generator (SG) Tube Integrity," (Insert 3 of Attachment 3 in the letter dated August 2, 2005) was revised to add LCO discussion from TSTF-449, Revision 4, page B 3.4.20-4 that was inadvertently omitted to page B 3/4 4-3: The operational leakage performance criterion provides an observable indication of SG tube conditions during plant operation. The limit on operational leakage is contained in LCO 3.4.6.2, "Operational Leakage," and limits primary-to-secondary leakage through any one SG to 150 gallons per day. This limit is based on the assumption that a single crack leaking this amount would not propagate to a SGTR under the stress conditions of a LOCA or a main steam line break. If this amount of leakage is due to more than one crack, the cracks are very small, and the above assumption is conservative.
5. TS BASES 3/4.4.5, "Steam Generator (SG) Tube Integrity," (Insert 3 of Attachment 3 in the letter dated August 2, 2005), was revised to add "refueling outage or" in front of SG inspection in the first complete sentence at the top of page B 3/4 4-4.
6. TS 3.4.5 subactions under Action a on page 3/4 4-7 (Insert 1 of Attachment 3 in the letter dated August 2, 2005), were changed from 3 and 4 to 1 and 2. This page was corrected to read the same as Insert 1 of Attachment 2 in the letter dated August 2, 2005.
7. TS BASES 3/4.4.5, "Steam Generator (SG) Tube Integrity," (Insert 3 of Attachment 3 in the letter dated August 2, 2005), was revised to add the sentence from TSTF-449, Revision 4, page B 3.4.20-6, section SR

- 3.4.20.2 to the last paragraph on page B 3/4 4-4: NEI 97-06 provides guidance for performing operational assessments to verify that the tubes remaining in service will continue to meet the SG performance criteria.
8. TS BASES 3/4.4.6.2, "Operational Leakage," restored the paragraph on Pressure Boundary Leakage to page B 3/4 4-4a that was inadvertently removed.
 9. TS BASES 3/4.4.6.2, "Operational Leakage," (Insert 5 of Attachment 3 in the letter dated August 2, 2005), was revised to add sentence from TSTF-449, Revision 4, page 2, Insert B 3.4.13 D (WOG) to the last paragraph on page B 3/4 4-4b: If SR 4.4.6.2.c is not met, compliance with LCO 3.4.5 "Steam Generator (SG) Tube Integrity," should be evaluated.
 10. TS BASES 3/4.4.6.2, "Operational Leakage," (Insert 5 of Attachment 3 in the letter dated August 2, 2005), was revised to add to the end of the last sentence in the section on page B 3/4 4-4b, "(in accordance with EPRI PWR Primary-to-Secondary Leak Guidelines)."

**TECHNICAL SPECIFICATION PAGES INCORPORATING
PROPOSED CHANGES**

Salem Unit 1 Affected Page List

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Index Page XII

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<u>Technical Specification</u>	<u>Page</u>
1.15, "Identified Leakage"	1-4
1.19, "Operational MODE – MODE"	1-4
1.21, "Pressure Boundary Leakage"	1-5
3/4.4.5, "Steam Generator (SG) Tube Integrity"	3/4 4-7 through 3/4 4-13a
3/4.4.6.2, "Operational Leakage"	3/4 4-15 and 3/4 4-16
6.8.4.i, "Steam Generator (SG) Program"	6-19b through 6-19d
6.9.1.10, "Steam Generator Tube Inspection Report"	6-24a and 6-24b

The following Technical Specifications Bases for Salem Unit 1, Facility Operating License No. DPR-70, are affected by this change request:

<u>Technical Specification</u>	<u>Page</u>
Bases 3/4.4.5	B 3/4 4-2 through B 3/4 4-4a
Bases 3/4.4.6.2	B 3/4 4-4a and B 3/4-4b

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DEFINITIONS

- b. Leakage into the containment atmosphere from sources that are both specifically located and known either not to interfere with the operation of leakage detection systems or not to be PRESSURE BOUNDARY LEAKAGE, or
- c. Reactor coolant system leakage through a steam generator to the secondary system (primary-to-secondary leakage).

MEMBER(S) OF THE PUBLIC

1.16 MEMBER(S) OF THE PUBLIC shall be all those persons who are not occupationally associated with the plant. This category does not include employees of PSE&G, its contractors, or vendors. Also excluded from this category are persons who enter the site to service equipment or to make deliveries. This category does include persons who use portions of the site for recreational, occupational, or other purposes not associated with the plant.

OFFSITE DOSE CALCULATION MANUAL (ODCM)

1.17 The OFFSITE DOSE CALCULATION MANUAL (ODCM) shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring Alarm/Trip setpoints, and in the conduct of the Environmental Radiological Monitoring Program. The ODCM shall also contain (1) the Radioactive Effluent controls and Radiological Environmental Monitoring programs required by Section 6.8.4 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and Annual Radioactive Effluent Release Reports required by Specifications 6.9.1.7 and 6.9.1.8 respectively.

OPERABLE - OPERABILITY

1.18 A system, subsystem, train, component, or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified safety function(s) and when all necessary attendant instrumentation, controls, normal or emergency electrical power, cooling and seal water, lubrication, and other auxiliary equipment that are required for the system, subsystem, train, component, or device to perform its specified safety function(s) are also capable of performing their related support function(s).

OPERATIONAL MODE - MODE

1.19 An OPERATIONAL MODE (i.e., MODE) shall correspond to any one inclusive combination of core reactivity condition, power level and average reactor coolant temperature specified in Table 1.1.

DEFINITIONS

PHYSICS TESTS

1.20 PHYSICS TESTS shall be those tests performed to measure the fundamental nuclear characteristics of the reactor core and related instrumentation and 1) described in Chapter 14 of the Updated FSAR, 2) authorized under the provisions of 10CFR50.59, or 3) otherwise by the Commission.

PRESSURE BOUNDARY LEAKAGE

1.21 PRESSURE BOUNDARY LEAKAGE shall be leakage (except primary-to-secondary leakage) through a non-isolable fault in a Reactor Coolant System component body, pipe wall or vessel wall.

PROCESS CONTROL PROGRAM (PCP)

1.22 The PROCESS CONTROL PROGRAM (PCP) shall contain the current formulas, sampling, analyses, test, and determinations to be made to ensure that processing and packaging of solid radioactive wastes based on demonstrated processing of actual or simulated wet solid wastes will be accomplished in such a way as to assure compliance with 10 CFR Parts 20, 61, and 71, State regulations, burial ground requirements, and other requirements governing the disposal of radioactive waste.

PURGE - PURGING

1.23 PURGE or PURGING shall be the controlled process of discharging air or gas from a confinement to maintain temperature, pressure, humidity, concentration, or other operating condition, in such a manner that replacement air or gas is required to purify the confinement.

QUADRANT POWER TILT RATIO

1.24 QUADRANT POWER TILT RATIO shall be the ratio of the maximum upper excore detector calibrated output to the average of the upper excore detector calibrated outputs, or the ratio of the maximum lower excore detector calibrated output to the average of the lower excore detector calibrated outputs, whichever is greater. With one excore detector inoperable, the remaining three detectors shall be used for computing the average.

RATED THERMAL POWER

1.25 RATED THERMAL POWER shall be a total reactor core heat transfer rate to the reactor coolant of 3459 MWt.

REACTOR COOLANT SYSTEM

STEAM GENERATOR (SG) TUBE INTEGRITY

LIMITING CONDITION FOR OPERATION

3.4.5 SG tube integrity shall be maintained and all SG tubes satisfying the tube repair criteria shall be plugged in accordance with the Steam Generator Program.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

- a.* With one or more SG tubes satisfying the tube repair criteria and not plugged in accordance with the Steam Generator Program:
 - 1. Verify tube integrity of the affected tube(s) is maintained until the next refueling outage or SG tube inspection within 7 days; and
 - 2. Plug the affected tube(s) in accordance with the Steam Generator Program prior to entering HOT SHUTDOWN following the next refueling outage or SG tube inspection.
- b. With SG tube integrity not maintained or the required Action of a. above not met, be in at least HOT STANDBY within 6 hours and in at least COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.4.5.1 Verify SG tube integrity in accordance with the Steam Generator Program.

4.4.5.2 Verify that each inspected SG tube that satisfies the tube repair criteria is plugged in accordance with the Steam Generator Program prior to entering HOT SHUTDOWN following a SG tube inspection.

*Separate Action is allowed for each SG tube.

PAGES 3/4 4-8 THROUGH 3/4 4-13a DELETED

REACTOR COOLANT SYSTEM

OPERATIONAL LEAKAGE

LIMITING CONDITION FOR OPERATION

3.4.6.2 Reactor Coolant System leakage shall be limited to:

- a. No PRESSURE BOUNDARY LEAKAGE,
- b. 1 GPM UNIDENTIFIED LEAKAGE,
- c. 150 gallons per day primary-to-secondary leakage through any one steam generator, and
- d. 10 GPM IDENTIFIED LEAKAGE from the Reactor Coolant System.

APPLICABILITY: MODES 1, 2, 3 and 4

ACTION:

- a. With any PRESSURE BOUNDARY LEAKAGE or primary-to-secondary leakage not within limit, be in at least HOT STANDBY within 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With any Reactor Coolant System leakage greater than any one of the above limits, excluding PRESSURE BOUNDARY LEAKAGE and primary-to-secondary leakage, reduce the leakage rate to within limits within 4 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.4.6.2 Reactor Coolant System leakages shall be demonstrated to be within each of the above limits by;

- a. Monitoring the containment atmosphere particulate radioactivity monitor at least once per 12 hours.
- b. Monitoring the containment sump inventory at least once per 12 hours.

REACTOR COOLANT SYSTEM

SURVEILLANCE REQUIREMENTS (Continued)

- c.* Verifying primary-to-secondary leakage is \leq 150 gallons per day through any one steam generator at least once per 72 hours during steady state operation.
- d.* Performance of a Reactor Coolant System water inventory balance** at least once per 72 hours. The water inventory balance shall be performed with the plant at steady state conditions. The provisions of specification 4.0.4 are not applicable for entry into Mode 4, and
- e. Monitoring the reactor head flange leakoff system at least once per 24 hours.

*Not required to be completed until 12 hours after establishment of steady state operation.

**Not applicable to primary-to-secondary leakage.

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- 7) Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the SITE BOUNDARY conforming to the doses associated with 10 CFR Part 20, Appendix B, Table II, Column 1,
- 8) Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR Part 50,
- 9) Limitations on the annual and quarterly doses to a MEMBER OF THE PUBLIC from Iodine-131, Iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR Part 50,
- 10) Limitations on the annual dose or dose commitment to any MEMBER OF THE PUBLIC due to releases of radioactivity and to radiation from uranium fuel cycle sources conforming to 40 CFR Part 190.

6.8.4.h Radiological Environmental Monitoring Program

A program shall be provided to monitor the radiation and radionuclides in the environs of the plant. The program shall provide (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the effluent monitoring program and modeling of environmental exposure pathways. The program shall (1) be contained in the ODCM, (2) conform to the guidance of Appendix I to 10 CFR Part 50, and (3) include the following:

- 1) Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the ODCM,
- 2) A Land Use Census to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the monitoring program are made if required by the results of the census, and
- 3) Participation in a Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.

6.8.4.i Steam Generator (SG) Program

A Steam Generator Program shall be established and implemented to ensure that SG tube integrity is maintained. In addition, the Steam Generator Program shall include the following provisions:

- a. Provisions for condition monitoring assessments. Condition monitoring assessment means an evaluation of the "as found" condition of the tubing with respect to the performance criteria for structural integrity and accident induced leakage. The "as found" condition refers to the condition of the tubing during an SG inspection outage, as determined from the inservice inspection results or by other means, prior to the plugging of tubes. Condition monitoring assessments shall be conducted during each

ADMINISTRATIVE CONTROLS

outage during which the SG tubes are inspected or plugged to confirm that the performance criteria are being met.

- b. Performance criteria for SG tube integrity. SG tube integrity shall be maintained by meeting the performance criteria for tube structural integrity, accident induced leakage, and operational leakage.
 - 1. Structural integrity performance criterion: All in-service steam generator tubes shall retain structural integrity over the full range of normal operating conditions (including startup, operation in the power range, hot standby, and cool down and all anticipated transients included in the design specification) and design basis accidents. This includes retaining a safety factor of 3.0 against burst under normal steady state full power operation primary-to-secondary pressure differential and a safety factor of 1.4 against burst applied to the design basis accident primary-to-secondary pressure differentials. Apart from the above requirements, additional loading conditions associated with the design basis accidents, or combination of accidents in accordance with the design and licensing basis, shall also be evaluated to determine if the associated loads contribute significantly to burst or collapse. In the assessment of tube integrity, those loads that do significantly affect burst or collapse shall be determined and assessed in combination with the loads due to pressure with a safety factor of 1.2 on the combined primary loads and 1.0 on axial secondary loads.
 - 2. Accident induced leakage performance criterion: The primary-to-secondary accident induced leakage rate for any design basis accident, other than a SG tube rupture, shall not exceed the leakage rate assumed in the accident analysis in terms of total leakage rate for all SGs and leakage rate for an individual SG. Leakage is not to exceed 1 gallon per minute per SG.
 - 3. The operational leakage performance criterion is specified in LCO 3.4.6.2, "Reactor Coolant System Operational Leakage."
- c. Provisions for SG tube repair criteria. Tubes found by inservice inspection to contain flaws with a depth equal to or exceeding 40% of the nominal tube wall thickness shall be plugged.
- d. Provisions for SG tube inspections. Periodic SG tube inspections shall be performed. The number and portions of the tubes inspected and methods of inspection shall be performed with the objective of detecting flaws of any type (e.g., volumetric flaws, axial and circumferential cracks) that may be present along the length of the tube, from the tube-to-tubesheet weld at the tube inlet to the tube-to-tubesheet weld at the tube outlet, and that may satisfy the applicable tube repair criteria. The tube-to-tubesheet weld is not part of the tube. In addition to meeting the requirements of d.1, d.2, and d.3 below, the inspection scope, inspection methods, and inspection intervals shall be such as to ensure that SG tube integrity is maintained until the next SG inspection. An assessment of degradation shall be performed to determine the type and location of flaws to which the tubes may be susceptible and,

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based on this assessment, to determine which inspection methods need to be employed and at what locations.

1. Inspect 100% of the tubes in each SG during the first refueling outage following SG replacement.
 2. Inspect 100% of the tubes at sequential periods of 120, 90, and thereafter, 60 effective full power months. The first sequential period shall be considered to begin after the first inservice inspection of the SGs. In addition, inspect 50% of the tubes by the refueling outage nearest the midpoint of the period and the remaining 50% by the refueling outage nearest the end of the period. No SG shall operate for more than 48 effective full power months or two refueling outages (whichever is less) without being inspected.
 3. If crack indications are found in any SG tube, then the next inspection for each SG for the degradation mechanism that caused the crack indication shall not exceed 24 effective full power months or one refueling outage (whichever is less). If definitive information, such as from examination of a pulled tube, diagnostic non-destructive testing, or engineering evaluation indicates that a crack-like indication is not associated with a crack(s), then the indication need not be treated as a crack.
- e. Provisions for monitoring operational primary-to-secondary leakage.

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2. WCAP-8385, Power Distribution Control and Load Following Procedures - Topical Report, September 1974 (W Proprietary) Methodology for Specification 3/4.2.1 Axial Flux Difference. Approved by Safety Evaluation dated January 31, 1978.
 3. WCAP-10054-P-A, Rev. 1, Westinghouse Small Break ECCS Evaluation Model Using NOTRUMP Code, August 1985 (W Proprietary), Methodology for Specification 3/4.2.2 Heat Flux Hot Channel Factor. Approved for Salem by NRC letter dated August 25, 1993.
 4. WCAP-10266-P-A, Rev. 2, The 1981 Version of Westinghouse Evaluation Model Using BASH Code, Rev. 2. March 1987 (W Proprietary) Methodology for Specification 3/4.2.2 Heat Flux Hot Channel Factor. Approved by Safety Evaluation dated November 13, 1986.
 5. WCAP-12472-P-A, BEACON - Core Monitoring and Operations Support System, Revision 0, (W Proprietary). Approved February 1994.
 6. CENPD-397-P-A, Rev. 1, Improved Flow Measurement Accuracy Using Crossflow Ultrasonic Flow Measurement Technology, May 2000.
- c. The core operating limits shall be determined such that all applicable limits (e.g., fuel thermal mechanical limits, core thermal hydraulic limits, Emergency Core Cooling Systems (ECCS) limits, nuclear limits such as SDM, transient analysis limits, and accident analysis limits) of the safety analysis are met.
- d. The COLR, including any mid-cycle revisions or supplements, shall be provided upon issuance for each reload cycle to the NRC.

6.9.1.10 STEAM GENERATOR TUBE INSPECTION REPORT

A report shall be submitted within 180 days after the initial entry into HOT SHUTDOWN following completion of an inspection performed in accordance with the Specification 6.8.4.i, "Steam Generator (SG) Program." The report shall include:

- a. The scope of inspections performed on each SG,
- b. Active degradation mechanisms found,
- c. Nondestructive examination techniques utilized for each degradation mechanism,
- d. Location, orientation (if linear), and measured sizes (if available) of service induced indications,
- e. Number of tubes plugged during the inspection outage for each active degradation mechanism,
- f. Total number and percentage of tubes plugged to date, and
- g. The results of condition monitoring, including the results of tube pulls and in-situ testing.

ADMINISTRATIVE CONTROLS

SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the U.S. Nuclear Regulatory Commission, Document Control Desk, Washington, D.C. 20555, with a copy to the Administrator, USNRC Region I within the time period specified for each report.

6.9.3 Violations of the requirements of the fire protection program described in the Updated Final Safety Analysis Report which would have adversely affected the ability to achieve and maintain safe shutdown in the event of a fire shall be submitted to the U. S. Nuclear Regulatory Commission, Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator of the Regional Office of the NRC via the Licensee Event Report System within 30 days.

6.9.4 When a report is required by ACTION 8 or 9 of Table 3.3-11 "Accident Monitoring Instrumentation", a report shall be submitted within the following 14 days. The report shall outline the preplanned alternate method of monitoring for inadequate core cooling, the cause of the inoperability, and the plans and schedule for restoring the instrument channels to OPERABLE status.

REACTOR COOLANT SYSTEM

BASES

3/4.4.4 PRESSURIZER

The limit on the maximum water volume in the pressurizer assures that the parameter is maintained within the normal steady-state envelope of operation assumed in the SAR. The limit is consistent with the initial SAR assumptions. The 12 hour periodic surveillance is sufficient to assure that the parameter is restored to within its limit following expected transient operation. The maximum water volume also ensures that a steam bubble is formed and thus the RCS is not a hydraulically solid system. The requirement that a minimum number of pressurizer heaters be OPERABLE assures that the plant will be able to establish natural circulation.

3/4.4.5 STEAM GENERATOR (SG) TUBE INTEGRITY

The LCO requires that SG tube integrity be maintained. The LCO also requires that all SG tubes that satisfy the repair criteria be plugged in accordance with the Steam Generator Program.

During an SG inspection, any inspected tube that satisfies the Steam Generator Program repair criteria is removed from service by plugging. If a tube was determined to satisfy the repair criteria but was not plugged, the tube may still have tube integrity.

In the context of this Specification, a SG tube is defined as the entire length of the tube, including the tube wall, between the tube-to-tubesheet weld at the tube inlet and the tube-to-tubesheet weld at the tube outlet. The tube-to-tubesheet weld is not considered part of the tube.

A SG tube has tube integrity when it satisfies the SG performance criteria. The SG performance criteria are defined in Specification 6.8.4.i, "Steam Generator (SG) Program," and describe acceptable SG tube performance. The Steam Generator Program also provides the evaluation process for determining conformance with the SG performance criteria.

There are three SG performance criteria: structural integrity, accident induced leakage, and operational leakage. Failure to meet any one of these criteria is considered failure to meet the LCO.

The structural integrity performance criterion provides a margin of safety against tube burst or collapse under normal and accident conditions, and ensures structural integrity of the SG tubes under all anticipated transients included in the design specification. Tube burst is defined as, "The gross structural failure of the tube wall. The condition typically corresponds to an unstable opening displacement (e.g., opening area increased in response to constant pressure) accompanied by ductile (plastic) tearing of the tube material at the ends of the degradation." Tube collapse is defined as, "For the load displacement curve for a given structure, collapse occurs at the top of the load versus displacement curve where the slope of the curve becomes zero." The structural integrity performance criterion provides guidance on assessing loads that significantly affect burst or collapse. In that context, the term "significant" is defined as, "An accident loading condition other than differential pressure is considered significant when the addition of such loads in the assessment of the structural integrity performance criterion could cause a lower structural limit or limiting burst/collapse condition to be established." The determination of whether thermal loads are primary or secondary loads is based on the ASME definition

REACTOR COOLANT SYSTEM

BASES

3/4.4.5 STEAM GENERATOR (SG) TUBE INTEGRITY (Continued)

in which secondary loads are self-limiting and will not cause failure under single load application. For tube integrity evaluations, except for circumferential degradation, axial thermal loads are classified as secondary loads. For circumferential degradation, the classification of axial thermal loads as primary or secondary loads will be evaluated on a case-by-case basis. The division between primary and secondary classifications will be based on detailed analysis and/or testing.

Structural integrity requires that the primary membrane stress intensity in a tube not exceed the yield strength for all ASME Code, Section III, Service Level A (normal operating conditions) and Service Level B (upset or abnormal conditions) transients included in the design specification. This includes safety factors and applicable design basis loads based on ASME Code, Section III, Subsection NB and draft Reg. Guide 1.121.

The accident induced leakage performance criterion ensures that the primary-to-secondary leakage caused by a design basis accident, other than a steam generator tube rupture (SGTR), is within the accident analysis assumptions. The accident analysis assumes that accident induced leakage does not exceed 1 gpm per SG. The accident induced leakage rate includes any primary-to-secondary leakage existing prior to the accident in addition to primary-to-secondary leakage induced during the accident.

The operational leakage performance criterion provides an observable indication of SG tube conditions during plant operation. The limit on operational leakage is contained in LCO 3.4.6.2, "Operational Leakage," and limits primary-to-secondary leakage through any one SG to 150 gallons per day. This limit is based on the assumption that a single crack leaking this amount would not propagate to a SGTR under the stress conditions of a LOCA or a main steam line break. If this amount of leakage is due to more than one crack, the cracks are very small, and the above assumption is conservative.

The ACTION requirements are modified by a Note clarifying that the Actions may be entered independently for each SG tube. This is acceptable because the ACTION requirements provide appropriate compensatory actions for each affected SG tube. Complying with the ACTION requirements may allow for continued operation, and subsequent affected SG tubes are governed by subsequent ACTION requirements.

If it is discovered that one or more SG tubes examined in an inservice inspection satisfy the tube repair criteria but were not plugged in accordance with the Steam Generator Program, an evaluation of SG tube integrity of the affected tube(s) must be made. Steam generator tube integrity is based on meeting the SG performance criteria described in the Steam Generator Program. The SG repair criteria define limits on SG tube degradation that allow for flaw growth between inspections while still providing assurance that the SG performance criteria will continue to be met. In order to determine if a SG tube that should have been plugged has tube integrity, an evaluation must be completed that demonstrates that the SG performance criteria will continue to be met until the next refueling outage or SG tube inspection. The tube integrity determination is based on the estimated condition of the tube at the time the situation is discovered and the estimated growth of the degradation prior to the next SG tube inspection. An action time of 7 days is sufficient to complete the evaluation while minimizing the risk of plant operation with a

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3/4.4.5 STEAM GENERATOR (SG) TUBE INTEGRITY (Continued)

SG tube that may not have tube integrity. If the evaluation determines that the affected tube(s) have tube integrity, plant operation is allowed to continue until the next refueling outage or SG inspection provided the inspection interval continues to be supported by an operational assessment that reflects the affected tubes. However, the affected tube(s) must be plugged prior to entering HOT SHUTDOWN following the next refueling outage or SG inspection. This action time is acceptable since operation until the next inspection is supported by the operational assessment.

If SG tube integrity is not being maintained or the ACTION requirements are not met, the reactor must be brought to HOT STANDBY within 6 hours and COLD SHUTDOWN within 36 hours. The action times are reasonable based on operating experience, to reach the desired plant conditions from full power conditions in an orderly manner and without challenging plant systems.

During shutdown periods the SGs are inspected as required by surveillance requirements and the Steam Generator Program. NEI 97-06, "Steam Generator Program Guidelines," and its referenced EPRI Guidelines, establish the content of the Steam Generator Program. Use of the Steam Generator Program ensures that the inspection is appropriate and consistent with accepted industry practices.

During SG inspections a condition monitoring assessment of the SG tubes is performed. The condition monitoring assessment determines the "as found" condition of the SG tubes. The purpose of the condition monitoring assessment is to ensure that the SG performance criteria have been met for the previous operating period. The Steam Generator Program determines the scope of the inspection and the methods used to determine whether the tubes contain flaws satisfying the tube repair criteria. Inspection scope (i.e., which tubes or areas of tubing within the SG are to be inspected) is a function of existing and potential degradation locations. The Steam Generator Program also specifies the inspection methods to be used to find existing and potential degradation. Inspection methods are a function of degradation morphology, nondestructive examination (NDE) technique capabilities and inspection locations. The Frequency is determined by the operational assessment and other limits in the SG examination guidelines. The Steam Generator Program uses information on existing degradations and growth rates to determine an inspection Frequency that provides reasonable assurance that the tubing will meet the SG performance criteria at the next scheduled inspection. In addition, Specification 6.8.4.i contains prescriptive requirements concerning inspection intervals to provide added assurance that the SG performance criteria will be met between scheduled inspections.

During an SG inspection, any inspected tube that satisfies the Steam Generator Program repair criteria is removed from service by plugging. The tube repair criteria delineated in Specification 6.8.4.i are intended to ensure that tubes accepted for continued service satisfy the SG performance criteria with allowance for error in size measurement and future growth. In addition, the tube repair criteria, in conjunction with other elements of the Steam Generator Program, ensure that the SG performance criteria will continue to be met until the next inspection of the subject tube(s). NEI 97-06 provides guidance for performing operational assessments to verify that the tubes remaining in service will continue to meet the SG performance criteria. The Frequency of prior to entering HOT SHUTDOWN following a SG inspection

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3/4.4.5 STEAM GENERATOR (SG) TUBE INTEGRITY (Continued)

ensures that the Surveillance has been completed and all tubes meeting the repair criteria are plugged prior to subjecting the SG tubes to significant primary-to-secondary pressure differential.

3/4.4.6 REACTOR COOLANT SYSTEM LEAKAGE

3/4.4.6.1 LEAKAGE DETECTION SYSTEMS

The RCS leakage detection systems required by this specification are provided to monitor and detect leakage from the Reactor Coolant Pressure Boundary. These detection systems are consistent with the recommendations of Regulatory Guide 1.45, "Reactor Coolant Pressure Boundary Leakage Detection Systems", May 1973.

3/4.4.6.2 OPERATIONAL LEAKAGE

Industry experience has shown that while a limited amount of leakage is expected from the RCS, the unidentified portion of this leakage can be reduced to a threshold value of less than 1 GPM. This threshold value is sufficiently low to ensure early detection of additional leakage.

The 10 GPM IDENTIFIED LEAKAGE limitation provides allowance for a limited amount of leakage from known sources whose presence will not interfere with the detection of UNIDENTIFIED LEAKAGE by the leakage detection systems.

PRESSURE BOUNDARY LEAKAGE of any magnitude is unacceptable since it may be indicative of an impending gross failure of the pressure boundary. Therefore, the presence of any PRESSURE BOUNDARY LEAKAGE requires the unit to be promptly placed in COLD SHUTDOWN.

Primary-to-Secondary Leakage Through Any One SG

The primary-to-secondary leakage rate limit applies to leakage through any one Steam Generator. The limit of 150 gallons per day per steam generator is based on the operational leakage performance criterion in NEI 97-06, Steam Generator Program Guidelines. The Steam Generator Program operational leakage performance criterion in NEI 97-06 states, "The RCS operational primary-to-secondary leakage through any one SG shall be limited to 150 gallons per day." The limit is based on operating experience with steam generator tube degradation mechanisms that result in tube leakage. The operational leakage rate criterion in conjunction with the implementation of the Steam Generator program is an effective measure for minimizing the frequency of steam generator tube ruptures.

Actions

Unidentified leakage or identified leakage in excess of the LCO limits must be reduced to within limits within 4 hours. This action time allows time to verify leakage rates and either identify unidentified leakage or reduce leakage to within limits before the reactor must be shut down. This action is necessary to prevent further deterioration of the reactor coolant pressure boundary (RCPB). If any pressure boundary leakage exists, or primary-to-secondary leakage is not within limit, or if unidentified or identified leakage cannot be reduced to within limits within 4 hours, the reactor must be brought to lower pressure conditions to reduce the severity of the leakage and

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3/4.4.6.2 OPERATIONAL LEAKAGE (Continued)

its potential consequences. It should be noted that leakage past seals and gaskets is not pressure boundary leakage. The reactor must be brought to HOT STANDBY within 6 hours and COLD SHUTDOWN within 36 hours. This action reduces the leakage and also reduces the factors that tend to degrade the pressure boundary. The action 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. In COLD SHUTDOWN, the pressure stresses acting on the RCPB are much lower, and further deterioration is much less likely.

Surveillances

Verifying RCS leakage to be within the LCO limits ensures the integrity of the Reactor Coolant Pressure Boundary is maintained. Pressure boundary leakage would at first appear as unidentified leakage and can only be positively identified by inspection. It should be noted that leakage past seals and gaskets is not pressure boundary leakage. Unidentified leakage and identified leakage are determined by performance of an RCS water inventory balance. The RCS water inventory must be met with the reactor at steady state conditions. The surveillance is modified by a Note that the surveillance is not required to be performed until 12 hours after establishing steady state operation. The 12 hour allowance provides sufficient time to collect and process all necessary data after stable plant conditions are established. Steady state operation is required to perform a proper inventory balance since calculations during maneuvering are not useful. For RCS operational leakage determination by water inventory balance, steady state is defined as stable RCS pressure, temperature, power level, pressurizer and makeup tank levels, makeup and letdown, and Reactor Coolant Pump seal injection and return flows. The 72 hour frequency is a reasonable interval to trend leakage and recognizes the importance of early leakage detection in the prevention of accidents.

Satisfying the primary-to-secondary leakage limit ensures that the operational leakage performance criterion in the Steam Generator Program is met. If SR 4.4.6.2.c is not met, compliance with LCO 3.4.5, "Steam Generator Tube Integrity," should be evaluated. The 150 gallons per day limit is measured at room temperature (in accordance with EPRI PWR Primary-to-Secondary Leak Guidelines). If it is not practical to assign the leakage to an individual steam generator, all the primary-to-secondary leakage should be conservatively assumed to be from one Steam Generator. The Surveillance is modified by a Note which states that the surveillance is not required to be performed until 12 hours after establishment of steady state operation. For RCS primary-to-secondary leakage determination, steady state is defined as stable RCS pressure, temperature, power level, pressurizer and makeup tank levels, makeup and letdown, and Reactor Coolant Pump seal injection and return flows. The Surveillance Frequency of 72 hours is a reasonable interval to trend primary-to-secondary leakage and recognizes the importance of early leakage detection in the prevention of accidents. The primary-to-secondary leakage is determined using continuous process radiation monitors or radiochemical grab sampling (in accordance with EPRI PWR Primary-to-Secondary Leak Guidelines).

3/4.4.7

THIS SECTION DELETED