

I. OVERVIEW / SIGNATURES

Facility: Waterford 3 Steam Electric Station
 Document Reviewed: ER-W3-2005-0378

Change/Rev.: NA/00

System Designator(s)/Description: CVR, HRA, PASS

Description of Proposed Change:

CR-WF3-2004-4040 Corrective Action #2 requires ER-W3-2005-0378 to change FSAR Section 1.9.37.C to specifically state that Containment Vacuum Relief (CVR) Essential Instrument Lines, Hydrogen Analyzers (HRAs), and Gaseous portions of the Post Accident Sampling System (PASS) testing may use instrument air in addition to an inert gas or nitrogen for system testing per STA-001-004.

Check the applicable review(s): (Only the sections indicated must be included in the Review.)

<input type="checkbox"/>	EDITORIAL CHANGE of a Licensing Basis Document	Section I
<input type="checkbox"/>	SCREENING	Sections I and II required
<input type="checkbox"/>	50.59 EVALUATION EXEMPTION	Sections I, II, and III required
<input checked="" type="checkbox"/>	50.59 EVALUATION (#: <u>05-023</u>)	Sections I, II, and IV required

Preparer: Chris Pickering / *Chris Pickering* / EOI / Engineering / 9/10/05
 Name (print) / Signature / Company / Department / Date

Reviewer: Kenneth Boudreaux / *K. Boudreaux* / EOI / Engineering / 9/10/05
 Name (print) / Signature / Company / Department / Date

OSRC: Jason Laque / *Jason Laque* / 9/14/05
 Chairman's Name (print) / Signature / Date
 [Required only for Programmatic Exclusion Screenings and 50.59 Evaluations.]

II. SCREENINGS**A. Licensing Basis Document Review**

1. Does the proposed activity impact the facility or a procedure as described in any of the following Licensing Basis Documents?

Operating License	YES	NO	CHANGE # and/or SECTIONS IMPACTED
Operating License	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
TS	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
NRC Orders	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
If "YES", obtain NRC approval prior to implementing the change by initiating an LBD change in accordance with NMM ENS-LI-113. (See Section 5.2[13] for exceptions.)			

LBDs controlled under 50.59	YES	NO	CHANGE # (if applicable) and/or SECTIONS IMPACTED
FSAR	<input checked="" type="checkbox"/>	<input type="checkbox"/>	DRN-05-1265
TS Bases	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Technical Requirements Manual	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Core Operating Limits Report	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
NRC Safety Evaluation Report and supplements for the initial FSAR ¹	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
NRC Safety Evaluations for amendments to the Operating License ¹	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
If "YES", perform an Exemption Review per Section III <u>OR</u> perform a 50.59 Evaluation per Section IV <u>OR</u> obtain NRC approval prior to implementing the change. If obtaining NRC approval, document the LBD change in Section II.A.5; no further 50.59 review is required. However, the change cannot be implemented until approved by the NRC. <u>AND</u> initiate an LBD change in accordance with NMM ENS-LI-113.			

LBDs controlled under other regulations	YES	NO	CHANGE # (if applicable) and/or SECTIONS IMPACTED
Quality Assurance Program Manual ²	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Emergency Plan ^{2,3}	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Fire Protection Program ^{3,4} (includes the Fire Hazards Analysis)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Offsite Dose Calculations Manual ^{3,4}	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
If "YES", evaluate any changes in accordance with the appropriate regulation <u>AND</u> initiate an LBD change in accordance with NMM ENS-LI-113. No further 50.59 review is required.			

¹ If "YES," see Section 5.2[5]. No LBD change is required.

² If "YES," notify the responsible department and ensure a 50.54 Evaluation is performed. Attach the 50.54 Review.

³ Changes to the Emergency Plan, Fire Protection Program, and Offsite Dose Calculation Manual must be approved by the OSRC in accordance with NMM OM-119.

⁴ If "YES," evaluate the change in accordance with the requirements of the facility's Operating License Condition or under 50.59, as appropriate.

2. Does the proposed activity involve a test or experiment not described in the FSAR? Yes
 No

If "yes," perform a 50.59 Evaluation per Section IV OR obtain NRC approval prior to implementing the change AND initiate an LBD change in accordance with NMM LI-113. If obtaining NRC approval, document the change in Section II.A.5; no further 50.59 review is required. However, the change cannot be implemented until approved by the NRC.

3. Basis

Explain why the proposed activity does or does not impact the Operating License/Technical Specifications and/or the FSAR and why the proposed activity does or does not involve a new test or experiment not previously described in the FSAR. Discuss other LBDs if impacted. Adequate basis must be provided within the Screening such that a third-party reviewer can reach the same conclusions. Simply stating that the change does not affect TS or the FSAR is not an acceptable basis.

An electronic search of Licensing Basis Documents was conducted using the LRS Retrieval function of Autonomy (WF3) with the 50.59 Search filter applied, Quality set to 20%, and using the search terms listed in Section II.A.4. Some hits were redundant to documents that had already been manually reviewed. The remaining hits were either not relevant to the scope of the reviewed revision or only provided confirmatory or peripheral information. FSAR sections identified by the electronic search were reviewed as well as Change Notices (DRNs) against those FSAR sections. This review found no applicability to or impact upon the proposed changes by the reviewed sections and Change Notices under this portion of the 50.59 review. There were no conflicts found between the evaluated change items and the Environmental Protection Plan, Security Plan, or the QAPM.

ER-W3-2005-0378 changed FSAR Section 1.9.37.C to specifically state that Containment Vacuum Relief (CVR) Essential Instrument Lines, Hydrogen Analyzers (HRAs), and Gaseous portions of the Post Accident Sampling System (PASS) testing is required to use an inert gas, nitrogen, or instrument air for system testing by visually inspecting for leakage with a soapy solution.

Previously FSAR Section 1.9.37.C stated that CVR Essential Instrument Lines, HRAs, and Gaseous portions of the PASS only used an inert gas or nitrogen to perform testing (or equivalent method). The FSAR 1.9.37.C statement intent was to be in accordance with NUREG-0737 Item III.D.1.1 for monitoring leakage and to reduce detected leakage to as low as practical levels for systems outside containment which could contain radioactivity post accident. NUREG-0737 Item III.D.1.1 specifically states that testing of gaseous system should include helium leak detection or equivalent testing method. The response to the NUREG-0737 Item III.D.1.1 requirement was to use an equivalent method of pressurizing the system and inspecting for leaks with a soapy solution. The FSAR specifically identifies the use of an inert gas or nitrogen to pressurize the system. The FSAR change is just explicitly listing that instrument air can be used and does not change the equivalent method identified which is to inspect a pressurized system for leaks using a soapy solution.

CVR Essential Instrument Lines, HRAs, and Gaseous portions of the PASS normal system fluid medium is air. Specifically, these systems sample from and are exposed to the containment atmosphere [Drawings B430 SP01A, B430 SP01B, B430 DP26, B430 DP29]. The use of instrument air as a testing medium is not exposing the CVR Essential Instrument Lines, HRAs, and Gaseous portions of the PASS systems to any environment different than normal.

Instrument air is a clean dry air system. The use of this system to pressurize the CVR Essential Instrument Lines, HRAs, and Gaseous portions of the PASS systems does not pose a threat of contamination or pollutants entering those systems. Instrument air will have similar properties to the inert gases for the identification of system leakage using a soapy solution. The use of instrument air to pressurize the identified systems is an equivalent method.

Operating License/Technical Specifications

Technical Specification (TS) Section 6.8 provides administrative controls for procedures and programs. TS 6.8.1 requires written procedures to be established, implemented, and maintained covering the applicable procedures recommended in Regulatory Guide (RG) 1.33 Revision 2 (Quality Assurance Program Requirements) Appendix A.

RG 1.33 Appendix A recommends that procedures should be established for operation and surveillance testing.

TS 6.8.1 and RG 1.33 only provide that a surveillance and operation procedures are required. It does not provide specifics on what is to be included in the procedure or specific equipment information. Thus, the proposed changes are above the level of detail that is explicitly required.

Technical Specification (TS) 3.6.1.2 requires that the overall containment leakage rate and the secondary containment bypass leakage rate shall be in accordance with the Containment Leakage Rate Testing Program. TS 3.6.1.2 is applicable in Modes 1-4. The proposed change does not impact this TS.

TS 6.15 (CONTAINMENT LEAKAGE RATE TESTING PROGRAM) requires that a program shall be established to implement the leakage rate testing of containment as required by 10CFR50.54(o) and 10CFR50 Appendix J Option B as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163. The proposed change does not affect the testing program.

TS 6.8.4.a lists the program requirements to ensure that leakage from systems that could contain highly radioactive fluid to as low as practical levels. TS 6.8.4.a does not list specifics for testing media.

TS 3.6.3 requires that each containment isolation valve shall be OPERABLE. TS 3.6.3 is required in Modes 1-4. Technical Requirements Manual (TRM) Table 3.6-2 lists the applicable containment isolation valves. The proposed change does not impact this TS or TRM.

Technical Requirements Manual (TRM) 3.6.4.1 requires 2 independent hydrogen analyzers be OPERABLE in Modes 1-2. The proposed change does not affect the operation or flow paths to the hydrogen analyzers.

TS 3.6.5 requires 2 containment vacuum relief lines be OPERABLE in Modes 1-4. The proposed change does not affect the operation or flow paths through the CVR system.

This change does not alter the Operating License or Technical Specifications but rather reflects conditions that have already been addressed by other procedures. The LCOs, surveillances and other controls in the Operating License and Technical Specifications are not impacted by this change.

Final Safety Analysis Report (FSAR)

FSAR Section 13.5 (Plant Procedures) describes the operating procedures that are used by the plant operations organization to ensure that routine operating, off-normal, and emergency activities are conducted in a safe manner. FSAR Section 13.5.1.3 (Procedures) explicitly lists operation and surveillance testing procedures that were generated.

FSAR Section 13.5 only provides that a surveillance procedures and system operation procedures are required. It does not provide specifics on what is to be included in the procedure or specific

equipment information. Thus, the proposed changes are above the level of detail that is explicitly required.

ER-W3-2005-0378 changed FSAR Section 1.9.37.C to specifically state that Containment Vacuum Relief (CVR) Essential Instrument Lines, Hydrogen Analyzers (HRAs), and Gaseous portions of the Post Accident Sampling System (PASS) testing is required to use an inert gas, nitrogen, or instrument air for system testing by visually inspecting for leakage with a soapy solution.

FSAR Section 9.3.8 describes the Post Accident Sampling System (PASS). The PASS system is designed on the criteria set forth on NUREG-0660 and NUREG-0737 Item II.B.3 which deals with the implementation of capabilities for sampling the reactor coolant system and containment atmosphere during post accident conditions. All lines in the PASS are constructed of corrosion resistant stainless steel. Each portion of the system is designed for source pressure and temperature [FSAR 9.3.8.3]. This FSAR section does not explicitly address the system leakage tests or associated testing medium.

FSAR Section 6.2.5 describes the combustible gas control system in containment. The HRA system has the capability of sampling and measuring the containment atmosphere at various locations. The HRA system is available for periodic testing and inspection [FSAR 6.2.5.1]. This FSAR section does not explicitly address the system leakage tests or associated testing medium.

FSAR Section 6.2.4.2.2 describes the CVR Essential Lines. The essential line senses differential pressure across the containment vessel and provides a signal to actuate the Vacuum Relief Valves. This FSAR section does not explicitly address the system leakage tests or associated testing medium.

Electronic and Manual searches showed that some of the keywords used are found in sections of the FSAR. However, none of the changes to the FSAR impact the way these system, structures or components (SSCs) are described, drawn, or applied in the FSAR.

New Test or Experiment

ER-W3-2005-0378 changed FSAR Section 1.9.37.C to specifically include instrument air as a testing medium. The STA-001-004 procedure has been previously approved and is already testing CVR Essential Instrument Lines, HRAs, and Gaseous portions of the PASS for the purpose of measuring leakage past the boundary valves as part of the Appendix J Containment Leakage program. Thus, this change does not modify the testing methodology or components tested. The same tests are performed and no new tests have been created. Thus, this change does not involve an activity not described in the FSAR.

CONCLUSION

In conclusion, ER-W3-2005-0378 change to FSAR Section 1.9.37.C is the only Waterford 3 Licensing Basis Documents impacted.

4. References

Discuss the methodology for performing LBD searches. State the location of relevant licensing document information and explain the scope of the review such as electronic search criteria used (e.g., key words) or the general extent of manual searches per Section 5.5.1[5](d) of LI-101. **NOTE: Ensure that manual searches are performed using controlled copies of the documents. If you have any questions, contact your site Licensing department.**

LBDs/Documents reviewed via keyword search:	Keywords:	
Waterford 3 AUTONOMY was used to search:	"leakage rate" (HITS 71)	"LLRT" (HITS 7)
Technical Specifications and Bases	"leak rate" (HITS 79)	"decay test" (HITS 7)
Technical Requirements Manual and Bases	"pressure test" (HITS 73)	
Final Safety Analysis Report	"hydrogen analyzer" (HITS 43)	"HRA" (HITS 13)
FSAR Questions	"accident sampling" (HITS 23)	"PASS" (HITS 162)
Safety Evaluation Report SER (NUREG-0787)	"vacuum relief" (HITS 44)	"CVR" (HITS 14)
	inert (HITS 26)	"III.D.1.1" (HITS 9)

LBDs/Documents reviewed manually:

FSAR sections identified by the electronic search and Change Notices (DRNs) against those FSAR sections.

FSAR Sections 1.9.20, 1.9.37, 3.8.2.3, 6.2.4.2.2, 6.2.3, 6.2.5, 9.3.8, 13.5

Technical Specifications and Bases

Technical Requirements Manual and Bases

Commitment A17806, P17601, P17895, P20306,

P24336, P24240, P24239

REFERENCE DOCUMENTS

1. Technical Specification 3.6.1.2, 3.6.3, 3.6.5, 6.8, 6.15
2. Technical Requirements Manual 3.6.4.1 and Table 3.6-2
3. Final Safety Analysis Report 1.9.20, 1.9.37, 3.8.2.3, 6.2.4.2.2, 6.2.3, 6.2.5, 9.3.8, 13.5, 15
4. 10CFR50.34, Contents of applications; technical information
5. NRC Supplemental Safety Evaluation Report 8 Section III.D.1.1
6. Regulatory Guide 1.33 Revision 2, Quality Assurance Program Requirements
7. NUREG-0737, TMI
8. NUREG-0578, TMI-2 Lessons Learned Task Force Status Report and Short Term Recommendations
9. NUREG-0660, NRC Action Plan Developed as a Result of the TMI-2 Accident
10. NUREG-0694, TMI Related Requirements for New Operating Licenses
11. NUREG-0933,
12. NUREG-0800, Standard Review Plan
13. IE Circular No. 79-21, Prevention of Unplanned Releases of Radioactivity
14. Information Notice No. 86-60, Unanalyzed Post LOCA Release Paths
15. STA-001-004, Local Leak Rate Tests
16. ANSI/ANS-56.8-1981, Containment System Leakage Testing Requirements

5. Is the validity of this Review dependent on any other change? Yes
 No

If "YES", list the required changes/submittals. The changes covered by this 50.59 Review cannot be implemented without approval of the other identified changes (e.g., license amendment request). Establish an appropriate notification mechanism to ensure this action is completed.

B. ENVIRONMENTAL SCREENING

If any of the following questions is answered "yes," an Environmental Review must be performed in accordance with NMM Procedure ENS-EV-115, "Environmental Evaluations," and attached to this 50.59 Review. Consider both routine and non-routine (emergency) discharges when answering these questions.

Will the proposed Change being evaluated:

- | | Yes | No | |
|-----|--------------------------|-------------------------------------|--|
| 1. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Involve a land disturbance of previously disturbed land areas in excess of one acre (i.e., grading activities, construction of buildings, excavations, reforestation, creation or removal of ponds)? |
| 2. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Involve a land disturbance of undisturbed land areas (i.e., grading activities, construction, excavations, reforestation, creating, or removing ponds)? |
| 3. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Involve dredging activities in a lake, river, pond, or stream? |
| 4. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Increase the amount of thermal heat being discharged to the river or lake? |
| 5. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Increase the concentration or quantity of chemicals being discharged to the river, lake, or air? |
| 6. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Discharge any chemicals new or different from that previously discharged? |
| 7. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Change the design or operation of the intake or discharge structures? |
| 8. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Modify the design or operation of the cooling tower that will change water or air flow characteristics? |
| 9. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Modify the design or operation of the plant that will change the path of an existing water discharge or that will result in a new water discharge? |
| 10. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Modify existing stationary fuel burning equipment (i.e., diesel fuel oil, butane, gasoline, propane, and kerosene)? ¹ |
| 11. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Involve the installation of stationary fuel burning equipment or use of portable fuel burning equipment (i.e., diesel fuel oil, butane, gasoline, propane, and kerosene)? ¹ |
| 12. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Involve the installation or use of equipment that will result in a new or additional air emission discharge? |
| 13. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Involve the installation or modification of a stationary or mobile tank? |
| 14. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Involve the use or storage of oils or chemicals that could be directly released into the environment? |
| 15. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Involve burial or placement of any solid wastes in the site area that may affect runoff, surface water, or groundwater? |

¹ See NMM Procedure ENS-EV-117, "Air Emissions Management Program," for guidance in answering this question.

C. SECURITY PLAN SCREENING

If any of the following questions is answered "yes," a Security Plan Review must be performed by the Security Department to determine actual impact to the Plan and the need for a change to the Plan.

Could the proposed activity being evaluated:

- | | <u>Yes</u> | <u>No</u> | |
|-----|--------------------------|-------------------------------------|--|
| 1. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Add, delete, modify, or otherwise affect Security department responsibilities (e.g., including fire brigade, fire watch, and confined space rescue operations)? |
| 2. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Result in a breach to any security barrier(s) (e.g., HVAC ductwork, fences, doors, walls, ceilings, floors, penetrations, and ballistic barriers)? |
| 3. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Cause materials or equipment to be placed or installed within the Security Isolation Zone? |
| 4. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Affect (block, move, or alter) security lighting by adding or deleting lights, structures, buildings, or temporary facilities? |
| 5. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Modify or otherwise affect the intrusion detection systems (e.g., E-fields, microwave, fiber optics)? |
| 6. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Modify or otherwise affect the operation or field of view of the security cameras? |
| 7. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Modify or otherwise affect (block, move, or alter) installed access control equipment, intrusion detection equipment, or other security equipment? |
| 8. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Modify or otherwise affect primary or secondary power supplies to access control equipment, intrusion detection equipment, other security equipment, or to the Central Alarm Station or the Secondary Alarm Station? |
| 9. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Modify or otherwise affect the facility's security-related signage or land vehicle barriers, including access roadways? |
| 10. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Modify or otherwise affect the facility's telephone or security radio systems? |

Documentation for accepting any "yes" statement for these reviews will be attached to this 50.59 Review or referenced below.

IV. 50.59 EVALUATION

License Amendment Determination

Does the proposed Change being evaluated represent a change to a method of evaluation Yes
ONLY? If "Yes," Questions 1 – 7 are not applicable; answer only Question 8. If "No," answer No
 all questions below.

Does the proposed Change:

1. Result in more than a minimal increase in the frequency of occurrence of an accident Yes
 previously evaluated in the FSAR? No

BASIS:

The proposed change affects CVR Essential Instrument Lines, HRAs, and Gaseous portions of the PASS. These systems are used post accident for specific functions. These systems are not an accident initiator. This means that the frequency of occurrence of an accident has not risen because the failure of any of these systems is not an accident and correspondingly would not affect the frequency.

2. Result in more than a minimal increase in the likelihood of occurrence of a malfunction of a Yes
 structure, system, or component important to safety previously evaluated in the FSAR? No

BASIS:

CVR Essential Instrument Lines, HRAs, and Gaseous portions of the PASS normal system fluid medium is air. Specifically, these systems sample from and are exposed to the containment atmosphere [Drawings B430 SP01A, B430 SP01B, B430 DP26, B430 DP29]. The use of instrument air as a testing medium is not exposing the CVR Essential Instrument Lines, HRAs, and Gaseous portions of the PASS systems to any environment different than normal.

Instrument air is a clean dry air system. The use of this system to pressurize the CVR Essential Instrument Lines, HRAs, and Gaseous portions of the PASS systems does not pose a threat of contamination or pollutants entering those systems. The response to the NUREG-0737 Item III.D.1.1 requirement was to use an equivalent method of pressurizing the system and inspecting for leaks with a soapy solution. The FSAR specifically identifies the use of an inert gas or nitrogen to pressurize the system. The FSAR change is just explicitly listing that instrument air can be used and does not change the equivalent method identified which is to inspect a pressurized system for leaks using a soapy solution.

Since, the testing medium (air) is the same as the system normal operating medium, the likelihood of this change causing a malfunction in the specified system has not risen.

3. Result in more than a minimal increase in the consequences of an accident previously evaluated in the FSAR? Yes
 No

BASIS:

The CVR Essential Instrument Lines, HRAs, and Gaseous portions of the PASS change specifically allows the use of instrument air as a testing medium. The use of instrument air as a testing medium is not exposing the CVR Essential Instrument Lines, HRAs, and Gaseous portions of the PASS systems to any environment different than normal.

The system functions and components are not changed or affected by this change. Thus, CVR Essential Instrument Lines, HRAs, and Gaseous portions of the PASS post accident functions and failure modes have not changed. This also means that the consequences of an accident previously evaluated has not changed.

4. Result in more than a minimal increase in the consequences of a malfunction of a structure, system, or component important to safety previously evaluated in the FSAR? Yes
 No

BASIS:

The CVR Essential Instrument Lines, HRAs, and Gaseous portions of the PASS change specifically allows the use of instrument air as a testing medium. The use of instrument air as a testing medium is not exposing the CVR Essential Instrument Lines, HRAs, and Gaseous portions of the PASS systems to any environment different than normal.

The system functions and components are not changed or affected by this change. Thus, CVR Essential Instrument Lines, HRAs, and Gaseous portions of the PASS post accident functions and failure modes have not changed. This also means that the consequences of an equipment malfunction previously evaluated has not changed.

5. Create a possibility for an accident of a different type than any previously evaluated in the FSAR? Yes
 No

BASIS:

The proposed change affects CVR Essential Instrument Lines, HRAs, and Gaseous portions of the PASS. These systems are used post accident for specific functions. These systems are not an accident initiator. This means that a new or different accident can not be initiated by one of these systems.

The system functions and components are not changed or affected by this change. Thus, CVR Essential Instrument Lines, HRAs, and Gaseous portions of the PASS post accident functions and failure modes have not changed. A single failure in these systems will not create a new or different accident than was previously evaluated.

6. Create a possibility for a malfunction of a structure, system, or component important to safety with a different result than any previously evaluated in the FSAR? Yes No

BASIS:

The CVR Essential Instrument Lines, HRAs, and Gaseous portions of the PASS change specifically allows the use of instrument air as a testing medium. The use of instrument air as a testing medium is not exposing the CVR Essential Instrument Lines, HRAs, and Gaseous portions of the PASS systems to any environment different than normal.

The proposed change affects CVR Essential Instrument Lines, HRAs, and Gaseous portions of the PASS. These systems are used post accident for specific functions. The system functions and components are not changed or affected by this change. Thus, CVR Essential Instrument Lines, HRAs, and Gaseous portions of the PASS post accident functions and failure modes have not changed.

Since, the structure, system, and components are not affected by this change, the possibility of a malfunction with different results has not been created.

7. Result in a design basis limit for a fission product barrier as described in the FSAR being exceeded or altered? Yes No

BASIS:

The proposed change affects CVR Essential Instrument Lines, HRAs, and Gaseous portions of the PASS. These systems are used post accident for specific functions. The system functions and components are not changed or affected by this change. Thus, CVR Essential Instrument Lines, HRAs, and Gaseous portions of the PASS post accident functions and failure modes have not changed which also means that fission product barriers (fuel, reactor coolant system, and containment) limits have not changed.

8. Result in a departure from a method of evaluation described in the FSAR used in establishing the design bases or in the safety analyses? Yes No

BASIS:

Previously FSAR Section 1.9.37.C stated that CVR Essential Instrument Lines, HRAs, and Gaseous portions of the PASS only used an inert gas or nitrogen to perform testing (or equivalent method). The FSAR 1.9.37.C statement intent was to be in accordance with NUREG-0737 Item III.D.1.1 for monitoring leakage and to reduce detected leakage to as low as practical levels for systems outside containment which could contain radioactivity post accident. NUREG-0737 Item III.D.1.1 specifically states that testing of gaseous system should include helium leak detection or equivalent testing method. The response to the NUREG-0737 Item III.D.1.1 requirement was to use an equivalent method of pressurizing the system and inspecting for leaks with a soapy solution. The FSAR specifically identifies the use of an inert gas or nitrogen to pressurize the system. The FSAR change is just explicitly listing that instrument air can be used and does not change the equivalent method identified which is to inspect a pressurized system for leaks using a soapy solution..

CVR Essential Instrument Lines, HRAs, and Gaseous portions of the PASS normal system fluid medium is air. Specifically, these systems sample from and are exposed to the containment atmosphere [Drawings B430 SP01A, B430 SP01B, B430 DP26, B430 DP29]. The use of instrument air as a testing medium is not exposing the CVR Essential Instrument Lines, HRAs, and Gaseous portions of the PASS systems to any environment different than normal.

Instrument air is a clean dry air system. The use of this system to pressurize the CVR Essential Instrument Lines, HRAs, and Gaseous portions of the PASS systems does not pose a threat of contamination or pollutants entering those systems. Instrument air will has similar properties to the inert gases for the identification of system leakage using a soapy solution. The use of instrument air to pressurize the identified systems is an equivalent method.

If any of the above questions is checked "YES", obtain NRC approval prior to implementing the change by initiating a change to the Operating License in accordance with NMM Procedure ENS-LI-113.