

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

May 22, 2006

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Serial No. 06-403
NL&OS/ETS R0
Docket Nos. 50-338/339
License Nos. NPF-4/7

VIRGINIA ELECTRIC AND POWER COMPANY
NORTH ANNA POWER STATION UNITS 1 AND 2
PROPOSED LICENSE AMENDMENT REQUEST
CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS
TECHNICAL SPECIFICATION IMPROVEMENT
REGARDING STEAM GENERATOR TUBE INTEGRITY

Pursuant to 10 CFR 50.90, Virginia Electric and Power Company (Dominion) requests amendments, in the form of changes to the Technical Specifications (TS) to Facility Operating License Numbers NPF-4 and NPF-7 for North Anna Power Station Units 1 and 2, respectively. The proposed amendment would revise the TS requirements related to steam generator tube integrity. The changes are consistent with NRC-approved Revision 4 to Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-449, "Steam Generator Tube Integrity."

The availability of this TS improvement was announced in the Federal Register on May 6, 2005 (70 FR 24126) as part of the consolidated line item improvement process (CLIP). A discussion of the proposed TS changes is provided in Attachment 1. The marked-up and proposed TS pages are provided in Attachments 2 and 3, respectively. The associated Bases changes are provided in Attachments 4 and 5 for information only and will be implemented in accordance with the TS Bases Control Program and 10 CFR 50.59.

The proposed changes have been reviewed and approved by the Station Nuclear Safety and Operating Committee.

Dominion requests approval of the license amendments by March 31, 2007 with a 180-day implementation period.

If you have any questions or require additional information, please contact Mr. Thomas Shaub at (804) 273-2763.

Very truly yours,



Eugene S. Grecheck
Vice President – Nuclear Support Services

Attachments

1. Description and Assessment
2. Mark-up of Technical Specifications Changes
3. Proposed Technical Specifications Changes
4. Mark-up of Technical Specifications Bases Changes
5. Proposed Technical Specifications Bases Changes

Commitments made in this letter: None

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Attachment 1
Description and Assessment

North Anna Power Station
Units 1 and 2
Virginia Electric and Power Company
(Dominion)

Description and Assessment

1.0 INTRODUCTION

The proposed license amendment revises the requirements in Technical Specifications (TS) related to steam generator tube integrity. The changes are consistent with NRC approved Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-449, "Steam Generator Tube Integrity," Revision 4. The availability of this technical specification improvement was announced in the Federal Register on May 6, 2005 as part of the consolidated line item improvement process (CLIIP).

2.0 DESCRIPTION OF PROPOSED AMENDMENT

Consistent with the NRC-approved Revision 4 of TSTF-449, the proposed TS changes include:

- Revised TS definition of LEAKAGE
- Revised TS 3.4.13, "RCS [Reactor Coolant System] Operational Leakage"
- New TS 3.4.20, "Steam Generator (SG) Tube Integrity"
- Revised TS 5.5.8, "Steam Generator (SG) Program"
- Revised TS 5.6.7, "Steam Generator Tube Inspection Report"

Proposed revisions to the TS Bases are also included in this application. As discussed in the NRC's model safety evaluation, adoption of the revised TS Bases associated with TSTF-449, Revision 4 is an integral part of implementing this TS improvement. The changes to the affected TS Bases pages will be incorporated in accordance with the TS Bases Control Program after approval of the license amendment.

3.0 BACKGROUND

The background for this application is adequately addressed by the NRC Notice of Availability published on May 6, 2005 (70 FR 24126), the NRC Notice for Comment published on March 2, 2005 (70 FR 10298), and TSTF-449, Revision 4.

4.0 REGULATORY REQUIREMENTS AND GUIDANCE

The applicable regulatory requirements and guidance associated with this application are adequately addressed by the NRC Notice of Availability published on May 6, 2005 (70 FR 24126), the NRC Notice for Comment published on March 2, 2005 (70 FR 10298), and TSTF-449, Revision 4.

5.0 TECHNICAL ANALYSIS

Virginia Electric and Power Company (Dominion) has reviewed the safety evaluation (SE) published on March 2, 2005 (70 FR 10298) as part of the CLIIP Notice for Comment. This included the NRC staff's SE, the supporting information provided to support TSTF-449, and the changes associated with Revision 4 to TSTF-449.

Dominion has concluded that the justifications presented in the TSTF proposal and the SE prepared by the NRC staff are applicable to North Anna Power Station Units 1 and 2 and justify this amendment for the incorporation of the changes to the North Anna Units 1 and 2 TS.

6.0 REGULATORY ANALYSIS

A description of this proposed change and its relationship to applicable regulatory requirements and guidance was provided in the NRC Notice of Availability published on May 6, 2005 (70 FR 24126), the NRC Notice for Comment published on March 2, 2005 (70 FR 10298), and TSTF-449, Revision 4.

6.1 Verification and Commitments

The following information is provided to support the NRC staff's review of this amendment application:

Plant Name, Unit No.	North Anna Power Station (NAPS) Units 1 and 2	
Steam Generator Model(s):	Westinghouse Model 54F; 3-Loop	
Effective Full Power Years (EFPY) of service for currently installed SGs	<u>NAPS 1</u> 11.9 EFPY at last inspection in spring 2006 <u>NAPS 2</u> 9.1 EFPY at last inspection in fall 2005	
Tubing Material	690TT	
Number of tubes per SG	3592 tubes/SG	
Number and percentage of tubes plugged in each SG	<u>NAPS 1</u> SG A – 0 (0.00%) SG B – 0 (0.00%) SG C – 2 (0.06%)	<u>NAPS 2</u> SG A – 1 (0.03%) SG B – 0 (0.00%) SG C – 1 (0.03%)
Number of tubes repaired in each SG	None	
Current primary to secondary leakage limits: Leakage is evaluated at what temperature condition?	<u>TS</u> Per SG: 500 gpd Total: 1 gpm	<u>Admin. Control Limit</u> 50 gpd 150 gpd
Approved Alternate Tube Repair Criteria (ARC):	None	
Approved SG Tube Repair Methods	None	
Performance criteria for accident leakage	Primary to secondary leak rate values assumed in licensing basis accident analysis, including assumed temperature conditions. 1 gpm total SG leakage at room temperature ($\cong 70^{\circ}\text{F}$) and normal atmosphere pressure ($14.7/\text{in}^2$)	

7.0 NO SIGNIFICANT HAZARDS CONSIDERATION

Dominion has reviewed the proposed no significant hazards consideration determination published on March 2, 2005 (70 FR 10298) as part of the CLIP. Dominion has concluded that the proposed determination presented in the notice is applicable to North Anna Power Station Units 1 and 2 and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91 (a).

8.0 ENVIRONMENTAL EVALUATION

Dominion has reviewed the environmental evaluation included in the model SE published on March 2, 2005 (70 FR 10298) as part of the CLIP. Dominion has concluded that the staff's findings presented in that evaluation are applicable to North Anna Power Station Units 1 and 2, and the evaluation is hereby incorporated by reference for this application.

9.0 PRECEDENT

This application is being made in accordance with the CLIP. Dominion is not proposing variations or deviations from the TS changes described in TSTF-449, Revision 4, or the NRC staff's model SE published on March 2, 2005 (70 FR 10298).

10.0 REFERENCES

Federal Register Notices:

Notice for Comment published on March 2, 2005 (70 FR 10298)

Notice of Availability published on May 6, 2005 (70 FR 24126)

Attachment 2

Mark-up of Technical Specifications Changes

**North Anna Power Station
Units 1 and 2
Virginia Electric and Power Company
(Dominion)**

3.4.20 Steam Generator (SG) Tube Integrity 3.4.20-1

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1.1 Definitions

 \bar{E} -AVERAGE DISINTEGRATION ENERGY

\bar{E} shall be the average (weighted in proportion to the concentration of each radionuclide in the reactor coolant at the time of sampling) of the sum of the average beta and gamma energies per disintegration (in MeV) for isotopes, other than iodines, with half lives > 15 minutes, making up at least 95% of the total noniodine activity in the coolant.

ENGINEERED SAFETY FEATURE (ESF) RESPONSE TIME

The ESF RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its ESF actuation setpoint at the channel sensor until the ESF equipment is capable of performing its safety function (i.e., the valves travel to their required positions, pump discharge pressures reach their required values, etc.). Times shall include diesel generator starting and sequence loading delays, where applicable. The response time may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured. In lieu of measurement, response time may be verified for selected components provided that the components and methodology for verification have been previously reviewed and approved by the NRC.

LEAKAGE

LEAKAGE shall be:

a. Identified LEAKAGE

1. LEAKAGE, such as that from pump seals or valve packing (except reactor coolant pump (RCP) seal water injection or leakoff), that is captured and conducted to collection systems or a sump or collecting tank;
2. 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
3. Reactor Coolant System (RCS) LEAKAGE through a steam generator (~~SG~~) to the Secondary System;

(primary to secondary LEAKAGE); (continued)

1.1 Definitions

LEAKAGE
(continued)

b. Unidentified LEAKAGE

All LEAKAGE (except RCP seal water injection or leakoff) that is not identified LEAKAGE;

c. Pressure Boundary LEAKAGE

LEAKAGE (except ~~SG~~ LEAKAGE) through a nonisolable fault in an RCS component body, pipe wall, or vessel wall.

Primary to secondary

MASTER RELAY TEST

A MASTER RELAY TEST shall consist of energizing all master relays in the channel required for channel OPERABILITY and verifying the OPERABILITY of each required master relay. The MASTER RELAY TEST shall include a continuity check of each associated required slave relay. The MASTER RELAY TEST may be performed by means of any series of sequential, overlapping, or total steps.

MODE

A MODE shall correspond to any one inclusive combination of core reactivity condition, power level, average reactor coolant temperature, and reactor vessel head closure bolt tensioning specified in Table 1.1-1 with fuel in the reactor vessel.

OPERABLE-OPERABILITY

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).

PHYSICS TESTS

PHYSICS TESTS shall be those tests performed to measure the fundamental nuclear characteristics of the reactor core and related instrumentation. These tests are:

- a. Described in Chapter 14, Initial Tests and Operation, of the UFSAR;

(continued)

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.13 RCS Operational LEAKAGE

LCO 3.4.13 RCS operational LEAKAGE shall be limited to:

- a. No pressure boundary LEAKAGE;
- b. 1 gpm unidentified LEAKAGE;
- c. 10 gpm identified LEAKAGE;
- d. ~~1 gpm total primary to secondary LEAKAGE through all steam generators (SGs); and~~
- e. ¹⁵⁰ 500 gallons per day primary to secondary LEAKAGE through any one (SG).

steam generator

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

ACTIONS

operational

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. RCS LEAKAGE not within limits for reasons other than pressure boundary LEAKAGE.	A.1 Reduce LEAKAGE to within limits.	4 hours
B. Required Action and associated Completion Time of Condition A not met. OR Pressure boundary LEAKAGE exists.	B.1 Be in MODE 3. AND B.2 Be in MODE 5.	6 hours 36 hours

or primary to secondary LEAKAGE

OR
primary to secondary LEAKAGE not within limit.

2. Not applicable to primary to secondary LEAKAGE.

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.4.13.1 -----NOTE^(S) (1) Not required to be performed until 12 hours after establishment of steady state operation. ----- Verify RCS operational LEAKAGE is within limits by performance of RCS water inventory balance.</p>	<p>72 hours</p>
<p>SR 3.4.13.2 Verify steam generator tube integrity is in accordance with the Steam Generator Tube Surveillance Program.</p>	<p>In accordance with the Steam Generator Tube Surveillance Program 72 hours</p>

Verify primary to secondary LEAKAGE IS \leq 150 gallons per day through any one SG.

NOTE
 NOT required to be performed until 12 hours after establishment of steady state operation.

INSERT NEW TS 3.4.20

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.20 Steam Generator (SG) Tube Integrity

LCO 3.4.20 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.

ACTIONS

-----NOTE-----
 Separate Condition entry is allowed for each SG tube.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more SG tubes satisfying the tube repair criteria and not plugged in accordance with the Steam Generator Program.	A.1 Verify tube integrity of the affected tube(s) is maintained until the next refueling outage or SG tube inspection. <u>AND</u> A.2 Plug the affected tube(s) in accordance with the Steam Generator Program.	7 days Prior to entering MODE 4 following the next refueling outage or SG tube inspection
B. Required Action and associated Completion Time of Condition A not met. <u>OR</u> SG tube integrity not maintained.	B.1 Be in MODE 3. <u>AND</u> B.2 Be in MODE 5.	6 hours 36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.4.20.1	Verify SG tube integrity in accordance with the Steam Generator Program.	In accordance with the Steam Generator Program
SR 3.4.20.2	Verify that each inspected SG tube that satisfies the tube repair criteria is plugged in accordance with the Steam Generator Program.	Prior to entering MODE 4 following a SG tube inspection

5.5 Programs and Manuals

5.5.7 Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components. The program shall include the following:

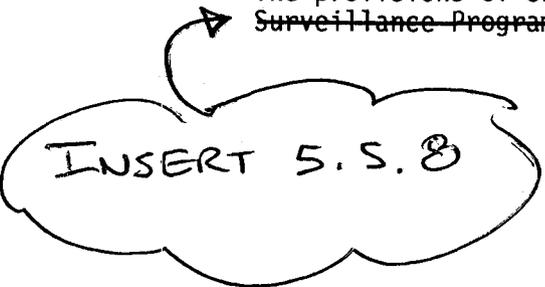
- a. Testing frequencies specified in the ASME Code for Operation and Maintenance of Nuclear Power Plants and applicable Addenda as follows:

<u>ASME Code for Operation and Maintenance of Nuclear Power Plants and applicable Addenda terminology for inservice testing activities</u>	<u>Required Frequencies for performing inservice testing activities</u>
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

- b. The provisions of SR 3.0.2 are applicable to the above required Frequencies for performing inservice testing activities;
- c. The provisions of SR 3.0.3 are applicable to inservice testing activities; and
- d. Nothing in the ASME Code for Operation and Maintenance of Nuclear Power Plants shall be construed to supersede the requirements of any TS.

5.5.8 Steam Generator (SG) ~~Tube Surveillance~~ Program

~~The provisions of SR 3.0.2 are applicable to the SG Tube Surveillance Program test Frequencies.~~



INSERT 5.5.8

5.5 Programs and Manuals

5.5.8 Steam Generator (SG) Tube Surveillance Program (continued)

This program provides the controls for the inservice inspection of steam generator tubes to ensure that the structural integrity of this portion of the RCS is maintained. The program for inservice inspection of steam generators is based on a modification of Regulatory Guide 1.83, Revision 1. This program shall include:

5.5.8.1 Steam Generator Sample Selection and Inspection

Each steam generator shall be determined OPERABLE during shutdown by selecting and inspecting at least the minimum number of steam generators specified in Table 5.5.8-1.

5.5.8.2 Steam Generator Tube Sample Selection and Inspection

The steam generator tube minimum sample size, inspection result classification, and the corresponding action required shall be as specified in Table 5.5.8-2. The inservice inspection of steam generator tubes shall be performed at the frequencies specified in Specification 5.5.8.3 and the inspected tubes shall be verified acceptable per the acceptance criteria of Specification 5.5.8.4. The tubes selected for each inservice inspection shall include at least 3% of the total number of tubes in all steam generators; the tubes selected for these inspections shall be selected on a random basis except:

- a. Where experience in similar plants with similar water chemistry indicates critical areas to be inspected, then at least 50% of the tubes inspected shall be from these critical areas.
- b. The first sample of tubes selected for each inservice inspection (subsequent to the preservice inspection) of each steam generator shall include:
 1. All nonplugged tubes that previously had detectable wall penetrations > 20%, and
 2. Tubes in those areas where experience has indicated potential problems.
 3. A tube inspection (pursuant to Specification 5.5.8.4.a.8) shall be performed on each selected tube. If any selected tube does not permit the passage of the eddy current probe for a tube inspection, this shall be recorded and an adjacent tube shall be selected and subjected to a tube inspection.

delete

5.5 Programs and Manuals

5.5.8.2 Steam Generator Tube Sample Selection and Inspection (continued)

c. The tubes selected as the second and third samples (if required by Table 5.5.8.2) during each inservice inspection may be subjected to a partial tube inspection provided:

1. The tubes selected for these samples include the tubes from those areas of the tube sheet array where, tubes with imperfections were previously found.
2. The inspections include those portions of the tubes where imperfections were previously found.

The results of each sample inspection shall be classified into one of the following three categories:

Category	Inspection Results ^a
C-1	Less than 5% of the total tubes inspected are degraded tubes and none of the inspected tubes are defective.
C-2	One or more tubes, but not more than 1% of the total tubes inspected are defective, or between 5% and 10% of the total tubes inspected are degraded tubes.
C-3	More than 10% of the total tubes inspected are degraded tubes or more than 1% of the inspected tubes are defective.

delete

a. In all inspections, previously degraded tubes must exhibit significant (> 10%) further wall penetrations to be included in the above percentage calculations.

5.5.8.3 Inspection Frequencies

The above required inservice inspections of steam generator tubes shall be performed at the following frequencies:

- a. The first inservice inspection shall be performed after 6 Effective Full Power Months but within 24 calendar months of initial criticality. Subsequent inservice inspections shall be performed at intervals of not less than 12 nor more than 24 calendar months after the previous inspection. If two consecutive inspections following service under AVT conditions,

(continued)

5.5 Programs and Manuals

5.5.8.3 Inspection Frequencies

a. (continued)

not including the preservice inspection, result in all inspection results falling into the C-1 category or if two consecutive inspections demonstrate that previously observed degradation has not continued and no additional degradation has occurred, the inspection interval may be extended to a maximum of once per 40 months.

b. If the results of the inservice inspection of a steam generator conducted in accordance with Table 5.5.8-2 at 40 month intervals fall into category C-3, the inspection frequency shall be increased to at least once per 20 months. The increase in inspection frequency shall apply until the subsequent inspections satisfy the criteria of Specification 5.5.8.3.a; the interval may then be extended to a maximum of once per 40 months.

c. Additional, unscheduled inservice inspections shall be performed on each steam generator in accordance with the first sample inspection specified in Table 5.5.8-2 during the shutdown subsequent to any of the following conditions:

1. Primary-to-secondary tubes leak (not including leaks originating from tube-to-tube sheet welds) in excess of the limits of Specification 3.4.13.
2. A seismic occurrence greater than the Operating Basis Earthquake.
3. A loss-of-coolant accident requiring actuation of the engineered safeguards.
4. A major steam line or feedwater line break.

delete
→

5.5.8.4 Acceptance Criteria

a. As used in this Specification:

1. Imperfection means an exception to the dimensions, finish or contour of a tube from that required by fabrication drawings or specifications. Eddy-current testing indications below 20% of the nominal tube wall thickness, if detectable, may be considered as imperfections.

5.5 Programs and Manuals

5.5.8.4 Acceptance Criteria

a. (continued)

2. Degradation means a service-induced cracking, wastage, wear or general corrosion occurring on either inside or outside of a tube.

3. Degraded Tube means a tube containing imperfections > 20% of the nominal wall thickness caused by degradation.

4. % Degradation means the percentage of the tube wall thickness affected or removed by degradation.

5. Defect means an imperfection of such severity that it exceeds the plugging limit. A tube containing a defect is defective.

6. Plugging Limit means the imperfection depth at or beyond which the tube shall be removed from service because it may become unserviceable prior to the next inspection and is equal to 40% of the nominal tube wall thickness.

7. Unserviceable describes the condition of a tube if it leaks or contains a defect large enough to affect its structural integrity in the event of an Operating Basis Earthquake, a loss-of-coolant accident, or a steam line or feedwater line break as specified in 5.5.8.3 c, above.

8. Tube Inspection means an inspection of the steam generator tube from the point of entry completely around the U-bend to the top support.

9. Preservice Inspection means an inspection of the full length of each tube in each steam generator performed by eddy-current techniques prior to service to establish a baseline condition of the tubing. This inspection shall be performed using the equipment and techniques expected to be used during subsequent inservice inspection.

b. The steam generator shall be determined OPERABLE after completing the corresponding actions (plug all tubes exceeding the plugging limit and all tubes containing through-wall cracks) required by Table 5.5.8-2.

delete

Table 5.5.8-1
Minimum Number of Steam Generators to Be Inspected
During Inservice Inspection

Preservice Inspection	No			Yes		
	Two	Three	Four	Two	Three	Four
First Inservice Inspection		All		One	Two	Two
Second & Subsequent Inservice Inspection		One ¹		One ¹	One ²	One ³

Table Notation:

1. The inservice inspection may be limited to one steam generator on a rotating schedule encompassing 3N% of the tubes (where N is the number of steam generators in the unit) if the results of the first or previous inspections indicate that all steam generators are performing in a like manner. Note that under some circumstances, the operating conditions in one or more steam generators may be found to be more severe than those in other steam generators. Under such circumstances the sample sequence shall be modified to inspect the most severe conditions.
2. The other steam generator not inspected during the first inservice inspection shall be inspected. The third and subsequent inspections should follow the instructions described in 1 above.
3. Each of the other two steam generators not inspected during the first inservice inspections shall be inspected during the second and third inspections. The fourth and subsequent inspections shall follow the instructions described in 1 above.

delete

**Table 5.5.8-2
Steam Generator Tube Inspection**

1st Sample Inspection			2nd Sample Inspection		3rd Sample Inspection	
Sample Size	Result	Action Required	Result	Action Required	Result	Action Required
A minimum of S Tubes per SG	C-1	None	N/A	N/A	N/A	N/A
	C-2	Plug defective tubes and inspect additional 2S tubes in SG	C-1	None	N/A	N/A
			C-2	Plug defective tubes and inspect additional 4S tubes in SG	C-1	None
					C-2	Plug defective tubes
					C-3	Perform action for C-3 result of first sample
			C-3	Perform action for C-3 result of first sample	N/A	N/A
	C-3	Inspect all tubes in this SG, plug defective tubes and inspect 2S tubes in each other SG	All other SGs are C-1	None	N/A	N/A
			Some SGs C-2 but no additional SG are C-3	Perform action for C-2 result of second sample	N/A	N/A
			Additional SG is C-3	Inspect all tubes in each SG and plug defective tubes	N/A	N/A

delete

$S = 3[N/n]\%$ Where N is the number of steam generators in the unit, and n is the number of steam generators inspected during an inspection.

INSERT 5.5.8

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 a 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 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 gpm for all SGs.
 3. The operational LEAKAGE performance criterion is specified in LCO 3.4.13, "RCS 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, 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 144, 108, 72, 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 72 effective full power months or three 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.

5.6 Reporting Requirements

5.6.5 CORE OPERATING LIMITS REPORT (COLR)

b. (continued)

14. BAW-10199P-A, "The BWU Critical Heat Flux Correlations."
15. BAW-10170P-A, "Statistical Core Design for Mixing Vane Cores."
16. EMF-2103 (P)(A), "Realistic Large Break LOCA Methodology for Pressurized Water Reactors."
17. EMF-96-029 (P)(A), "Reactor Analysis System for PWRs."
18. BAW-10168P-A, "RSG LOCA - BWNT Loss-of-Coolant Accident Evaluation Model for Recirculating Steam Generator Plants," Volume II only (SBLOCA models).

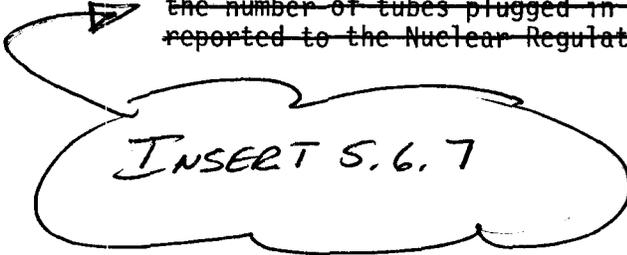
- c. The core operating limits shall be determined such that all applicable limits (e.g., fuel thermal mechanical limits, core thermal hydraulic limits, Emergency Core Cooling Systems (ECCS) limits, nuclear limits such as SDM, transient analysis limits, and accident analysis limits) of the safety analysis are met.
- d. The COLR, including any midcycle revisions or supplements, shall be provided upon issuance for each reload cycle to the NRC.

5.6.6 PAM Report

When a report is required by Condition B of LCO 3.3.3, "Post Accident Monitoring (PAM) Instrumentation," a report shall be submitted within the following 14 days. The report shall outline the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status.

5.6.7 Steam Generator Tube Inspection Report

- ~~a. Following each inservice inspection of steam generator tubes, the number of tubes plugged in each steam generator shall be reported to the Nuclear Regulatory Commission within 15 days.~~



INSERT 5.6.7

5.6 Reporting Requirements

~~5.6.7 Steam Generator Tube Inspection Report (continued)~~

- ~~b. The complete results of the steam generator tube inservice inspection shall be reported to the NRC by March 1 of each year for the previous calendar year. This report shall include:~~
- ~~1. Number and extent of tubes inspected.~~
 - ~~2. Location and percent of wall thickness penetration for each indication of an imperfection.~~
 - ~~3. Identification of tubes plugged.~~
- ~~c. Results of steam generator tube inspections that fall into Category C-3 require prompt notification of the Commission pursuant to Section 50.72 to 10 CFR Part 50. A Licensee Event Report shall be submitted pursuant to Section 50.73 to 10 CFR Part 50 and shall provide a description of investigations conducted to determine cause of the tube degradation and corrective measures taken to prevent recurrence.~~
-
-

INSERT 5.6.7

A report shall be submitted within 180 days after the initial entry into MODE 4 following completion of an inspection performed in accordance with the Specification 5.5.8, "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,
- g. The results of condition monitoring, including the results of tube pulls and in-situ testing, and
- h. The effective plugging percentage for all plugging in each SG.

Attachment 3
Proposed Technical Specifications Changes

North Anna Power Station
Units 1 and 2
Virginia Electric and Power Company
(Dominion)

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1.1 Definitions

\bar{E} -AVERAGE DISINTEGRATION ENERGY

\bar{E} shall be the average (weighted in proportion to the concentration of each radionuclide in the reactor coolant at the time of sampling) of the sum of the average beta and gamma energies per disintegration (in MeV) for isotopes, other than iodines, with half lives > 15 minutes, making up at least 95% of the total noniodine activity in the coolant.

ENGINEERED SAFETY FEATURE (ESF) RESPONSE TIME

The ESF RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its ESF actuation setpoint at the channel sensor until the ESF equipment is capable of performing its safety function (i.e., the valves travel to their required positions, pump discharge pressures reach their required values, etc.). Times shall include diesel generator starting and sequence loading delays, where applicable. The response time may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured. In lieu of measurement, response time may be verified for selected components provided that the components and methodology for verification have been previously reviewed and approved by the NRC.

LEAKAGE

LEAKAGE shall be:

a. Identified LEAKAGE

1. LEAKAGE, such as that from pump seals or valve packing (except reactor coolant pump (RCP) seal water injection or leakoff), that is captured and conducted to collection systems or a sump or collecting tank;
2. 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
3. Reactor Coolant System (RCS) LEAKAGE through a steam generator to the Secondary System (primary to secondary LEAKAGE);

(continued)

1.1 Definitions

LEAKAGE (continued)	<p>b. <u>Unidentified LEAKAGE</u></p> <p>All LEAKAGE (except RCP seal water injection or leakoff) that is not identified LEAKAGE;</p> <p>c. <u>Pressure Boundary LEAKAGE</u></p> <p>LEAKAGE (except primary to secondary LEAKAGE) through a nonisolable fault in an RCS component body, pipe wall, or vessel wall.</p>
MASTER RELAY TEST	<p>A MASTER RELAY TEST shall consist of energizing all master relays in the channel required for channel OPERABILITY and verifying the OPERABILITY of each required master relay. The MASTER RELAY TEST shall include a continuity check of each associated required slave relay. The MASTER RELAY TEST may be performed by means of any series of sequential, overlapping, or total steps.</p>
MODE	<p>A MODE shall correspond to any one inclusive combination of core reactivity condition, power level, average reactor coolant temperature, and reactor vessel head closure bolt tensioning specified in Table 1.1-1 with fuel in the reactor vessel.</p>
OPERABLE-OPERABILITY	<p>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).</p>
PHYSICS TESTS	<p>PHYSICS TESTS shall be those tests performed to measure the fundamental nuclear characteristics of the reactor core and related instrumentation. These tests are:</p> <p>a. Described in Chapter 14, Initial Tests and Operation, of the UFSAR;</p> <p>(continued)</p>

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.13 RCS Operational LEAKAGE

LC0 3.4.13 RCS operational LEAKAGE shall be limited to:

- a. No pressure boundary LEAKAGE;
- b. 1 gpm unidentified LEAKAGE;
- c. 10 gpm identified LEAKAGE;
- d. 150 gallons per day primary to secondary LEAKAGE through any one steam generator (SG).

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

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. RCS operational LEAKAGE not within limits for reasons other than pressure boundary LEAKAGE or primary to secondary LEAKAGE.	A.1 Reduce LEAKAGE to within limits.	4 hours
B. Required Action and associated Completion Time of Condition A not met. <u>OR</u> Pressure boundary LEAKAGE exists. <u>OR</u> Primary to secondary LEAKAGE not within limit.	B.1 Be in MODE 3. <u>AND</u> B.2 Be in MODE 5.	6 hours 36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.4.13.1 -----NOTES-----</p> <p>1. Not required to be performed until 12 hours after establishment of steady state operation.</p> <p>2. Not applicable to primary to secondary LEAKAGE.</p> <p>-----</p> <p>Verify RCS operational LEAKAGE is within limits by performance of RCS water inventory balance.</p>	<p>72 hours</p>
<p>SR 3.4.13.2 -----NOTE-----</p> <p>Not required to be performed until 12 hours after establishment of steady state operation.</p> <p>-----</p> <p>Verify primary to secondary LEAKAGE is ≤ 150 gallons per day through any one SG.</p>	<p>72 hours</p>

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.20 Steam Generator (SG) Tube Integrity

LC0 3.4.20 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.

ACTIONS

----- NOTE -----
Separate Condition entry is allowed for each SG tube.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more SG tubes satisfying the tube repair criteria and not plugged in accordance with the Steam Generator Program.	A.1 Verify tube integrity of the affected tube(s) is maintained until the next refueling outage or SG tube inspection.	7 days
	<u>AND</u> A.2 Plug the affected tube(s) in accordance with the Steam Generator Program.	Prior to entering MODE 4 following the next refueling outage or SG tube inspection

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. Required Action and associated Completion Time of Condition A not met. <u>OR</u> SG tube integrity not maintained.	B.1 Be in MODE 3.	6 hours
	<u>AND</u> B.2 Be in MODE 5.	36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.4.20.1 Verify SG tube integrity in accordance with the Steam Generator Program.	In accordance with the Steam Generator Program
SR 3.4.20.2 Verify that each inspected SG tube that satisfies the tube repair criteria is plugged in accordance with the Steam Generator Program.	Prior to entering MODE 4 following a SG tube inspection

5.5 Programs and Manuals

5.5.7 Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components. The program shall include the following:

- a. Testing frequencies specified in the ASME Code for Operation and Maintenance of Nuclear Power Plants and applicable Addenda as follows:

<u>ASME Code for Operation and Maintenance of Nuclear Power Plants and applicable Addenda terminology for inservice testing activities</u>	<u>Required Frequencies for performing inservice testing activities</u>
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

- b. The provisions of SR 3.0.2 are applicable to the above required Frequencies for performing inservice testing activities;
- c. The provisions of SR 3.0.3 are applicable to inservice testing activities; and
- d. Nothing in the ASME Code for Operation and Maintenance of Nuclear Power Plants shall be construed to supersede the requirements of any TS.

5.5.8 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 a SG inspection outage, as determined from the inservice

(continued)

5.5 Programs and Manuals

5.5.8 Steam Generator (SG) Program

a. (continued)

inspection results or by other means, prior to the plugging of tubes. Condition monitoring assessments shall be conducted during each 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 gpm for all SGs.
3. The operational LEAKAGE performance criterion is specified in LCO 3.4.13, "RCS Operational LEAKAGE."

5.5 Programs and Manuals

5.5.8 Steam Generator (SG) Program (continued)

- 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, 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 144, 108, 72, 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 72 effective full power months or three 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.

5.5 Programs and Manuals

5.5.8 Steam Generator (SG) Program (continued)

- e. Provisions for monitoring operational primary to secondary LEAKAGE.

5.5.9 Secondary Water Chemistry Program

This program provides controls for monitoring secondary water chemistry to inhibit SG tube degradation and low pressure turbine disc stress corrosion cracking. The program shall include:

- a. Identification of a sampling schedule for the critical variables and control points for these variables;
- b. Identification of the procedures used to measure the values of the critical variables;
- c. Identification of process sampling points, which shall include monitoring the discharge of the condensate pumps for evidence of condenser in leakage;
- d. Procedures for the recording and management of data;
- e. Procedures defining corrective actions for all off control point chemistry conditions; and
- f. A procedure identifying the authority responsible for the interpretation of the data and the sequence and timing of administrative events, which is required to initiate corrective action.

5.5.10 Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of Engineered Safety Feature (ESF) filter ventilation systems in general conformance with the frequencies and requirements of Regulatory Positions C.5.a, C.5.c, C.5.d, and C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, and ANSI N510-1975.

- a. Demonstrate for each of the ESF systems that an in-place test of the high efficiency particulate air (HEPA) filters shows a penetration and system bypass < 1.0% when tested in accordance
(continued)

5.5 Programs and Manuals

5.5.10 Ventilation Filter Testing Program (VFTP)

a. (continued)

with Regulatory Positions C.5.a and C.5.c of Regulatory Guide 1.52, Revision 2, March 1978, and ANSI N510-1975 at the system flowrate specified below.

<u>ESF Ventilation System</u>	<u>Flowrate</u>
Main Control Room/Emergency Switchgear Room (MCR/ESGR) Emergency Ventilation System (EVS)	1000 ± 10% cfm
Emergency Core Cooling System (ECCS) Pump Room Exhaust Air Cleanup System (PREACS)	Nominal accident flow for a single train actuation

Nominal accident flow for a single train actuation is greater than the minimum required cooling flow for ECCS equipment operation, and ≤ 39,200 cfm, which is the maximum flow rate providing an adequate residence time within the charcoal adsorber.

b. Demonstrate for each of the ESF systems that an in-place test of the charcoal adsorber shows a penetration and system bypass < 1.0% when tested in accordance with Regulatory Positions C.5.a and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and ANSI N510-1975 at the system flowrate specified below.

<u>ESF Ventilation System</u>	<u>Flowrate</u>
MCR/ESGR EVS	1000 ± 10% cfm
ECCS PREACS	Nominal accident flow for a single train actuation

Nominal accident flow for a single train actuation is greater than the minimum required cooling flow for ECCS equipment operation, and ≤ 39,200 cfm, which is the maximum flow rate providing an adequate residence time within the charcoal adsorber.

c. Demonstrate for each of the ESF systems that a laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, shows the methyl iodide penetration less than the
(continued)

5.5 Programs and Manuals

5.5.10 Ventilation Filter Testing Program (VFTP)

c. (continued)

value specified below when tested in accordance with ASTM D3803-1989 at a temperature of 30°C (86°F) and relative humidity specified below.

<u>ESF Ventilation System</u>	<u>Penetration</u>	<u>RH</u>
MCR/ESGR EVS	2.5%	70%
ECCS PREACS	5%	70%

d. Demonstrate for each of the ESF systems that the pressure drop across the combined HEPA filters, the prefilters, and the charcoal adsorbers is less than the value specified below when tested in accordance with ANSI N510-1975 at the system flowrate specified below.

<u>ESF Ventilation System</u>	<u>Delta P</u>	<u>Flowrate</u>
MCR/ESGR EVS	4 inches W.G.	1000 ± 10% cfm
ECCS PREACS	5 inches W.G.	≤ 39,200 cfm

e. Demonstrate that the heaters for each of the ESF systems dissipate ≥ the value specified below when tested in accordance with ASME N510-1975.

<u>ESF Ventilation System</u>	<u>Wattage</u>
MCR/ESGR EVS	3.5 kW

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the VFTP test frequencies.

5.5.11 Explosive Gas and Storage Tank Radioactivity Monitoring Program

This program provides controls for potentially explosive gas mixtures contained in the Gaseous Waste System, the quantity of radioactivity contained in gas storage tanks, and the quantity of radioactivity contained in unprotected outdoor liquid storage tanks. The gaseous radioactivity quantities shall be determined following the methodology in Branch Technical Position (BTP) ETSB 11-5, "Postulated Radioactive Release due to Waste Gas System Leak or
(continued)

5.5 Programs and Manuals

5.5.11 Explosive Gas and Storage Tank Radioactivity Monitoring Program (continued)

Failure". The liquid radwaste quantities shall be determined in accordance with Standard Review Plan, Section 15.7.3, "Postulated Radioactive Release due to Tank Failures".

The program shall include:

- a. The limits for concentrations of hydrogen and oxygen in the Gaseous Waste System and a surveillance program to ensure the limits are maintained. Such limits shall be appropriate to the system's design criteria (i.e., whether or not the system is designed to withstand a hydrogen explosion);
- b. A surveillance program to ensure that the quantity of radioactivity contained in each gas storage tank is less than the amount that would result in a whole body exposure of ≥ 0.5 rem to any individual in an unrestricted area, in the event of an uncontrolled release of the tanks' contents; and
- c. A surveillance program to ensure that the quantity of radioactivity contained in each of the following outdoor tanks that are not surrounded by liners, dikes, or walls, capable of holding the tanks' contents and that do not have tank overflows and surrounding area drains liquid radwaste ion exchanger system is less than the amount that would result in concentrations greater than the limits of 10 CFR 20, Appendix B, Table 2, Column 2, excluding tritium, at the nearest potable water supply and the nearest surface water supply in an unrestricted area, in the event of an uncontrolled release of the tanks' contents:
 1. Refueling Water Storage Tank;
 2. Casing Cooling Storage Tank;
 3. PG Water Storage Tank;
 4. Boron Recovery Test Tank; and
 5. Any Outside Temporary Tank.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Explosive Gas and Storage Tank Radioactivity Monitoring Program surveillance frequencies.

5.5 Programs and Manuals

5.5.12 Diesel Fuel Oil Testing Program

A diesel fuel oil testing program to implement required testing of both new fuel oil and stored fuel oil shall be established. The program shall include sampling and testing requirements, and acceptance criteria, all in accordance with applicable ASTM Standards. The purpose of the program is to establish the following:

- a. Acceptability of new fuel oil for use prior to addition to storage tanks by determining that the fuel oil has:
 1. an API gravity or an absolute specific gravity within limits,
 2. a flash point and kinematic viscosity within limits for ASTM 2D fuel oil, and
 3. water and sediment $\leq 0.05\%$.
- b. Within 31 days following addition of the new fuel oil to storage tanks verify that the properties of the new fuel oil, other than those addressed in a. above, are within limits for ASTM 2D fuel oil;
- c. Total particulate concentration of the stored fuel oil is ≤ 10 mg/l when tested every 92 days in accordance with ASTM D-2276, Method A-2 or A-3; and
- d. The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Diesel Fuel Oil Testing Program testing Frequencies.

5.5.13 Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

- a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.
 - b. Licensees may make changes to Bases without prior NRC approval provided the changes do not require either of the following:
 1. a change in the TS incorporated in the license; or
- (continued)

5.5 Programs and Manuals

5.5.13 Technical Specifications (TS) Bases Control Program (continued)

- b. (continued)
 - 2. a change to the UFSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59.
- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the UFSAR.
- d. Proposed changes that meet the criteria of Specification 5.5.13b above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e).

5.5.14 Safety Function Determination Program (SFDP)

This program ensures loss of safety function is detected and appropriate actions taken. Upon entry into LCO 3.0.6, an evaluation shall be made to determine if loss of safety function exists. Additionally, other appropriate actions may be taken as a result of the support system inoperability and corresponding exception to entering supported system Condition and Required Actions. This program implements the requirements of LCO 3.0.6. The SFDP shall contain the following:

- a. Provisions for cross train checks to ensure a loss of the capability to perform the safety function assumed in the accident analysis does not go undetected;
- b. Provisions for ensuring the plant is maintained in a safe condition if a loss of function condition exists;
- c. Provisions to ensure that an inoperable supported system's Completion Time is not inappropriately extended as a result of multiple support system inoperabilities; and
- d. Other appropriate limitations and remedial or compensatory actions.

A loss of safety function exists when, assuming no concurrent single failure, no concurrent loss of offsite power or loss of onsite diesel generator(s), a safety function assumed in the accident

(continued)

5.5 Programs and Manuals

5.5.14 Safety Function Determination Program (SFDP) (continued)

analysis cannot be performed. For the purpose of this program, a loss of safety function may exist when a support system is inoperable, and:

- a. A required system redundant to the system(s) supported by the inoperable support system is also inoperable; or
- b. A required system redundant to the system(s) in turn supported by the inoperable supported system is also inoperable; or
- c. A required system redundant to the support system(s) for the supported systems (a) and (b) above is also inoperable.

The SFDP identifies where a loss of safety function exists. If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered. When a loss of safety function is caused by the inoperability of a single Technical Specification support system, the appropriate Conditions and Required Actions to enter are those of the support system.

5.5.15 Containment Leakage Rate Testing Program

- a. A program shall establish the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995 as modified by the following exception:

NEI 94-01-1995, Section 9.2.3: The first Unit 1 Type A test performed after the April 3, 1993 Type A test shall be performed no later than April 2, 2008.

- b. The calculated peak containment internal pressure for the design basis loss of coolant accident, P_a , is 44.1 psig. The containment design pressure is 45 psig.
- c. The maximum allowable containment leakage rate, L_a , at P_a , shall be 0.1% of containment air weight per day.

(continued)

5.5 Programs and Manuals

5.5.15 Containment Leakage Rate Testing Program (continued)

d. Leakage Rate acceptance criteria are:

1. Prior to entering a MODE where containment OPERABILITY is required, the containment leakage rate acceptance criteria are:

$\leq 0.60 L_a$ for the Type B and Type C tests on a Maximum Path Basis and $\leq 0.75 L_a$ for Type A tests.

During operation where containment OPERABILITY is required, the containment leakage rate acceptance criteria are:

$\leq 1.0 L_a$ for overall containment leakage rate and $\leq 0.60 L_a$ for the Type B and Type C tests on a Minimum Path Basis.

2. Overall air lock leakage rate testing acceptance criterion is $\leq 0.05 L_a$ when tested at $\geq P_a$.

e. The provisions of SR 3.0.3 are applicable to the Containment Leakage Rate Testing Program.

f. Nothing in these Technical Specifications shall be construed to modify the testing Frequencies required by 10 CFR 50, Appendix J.

5.6 Reporting Requirements

5.6.5 CORE OPERATING LIMITS REPORT (COLR)

b. (continued)

14. BAW-10199P-A, "The BWU Critical Heat Flux Correlations."
15. BAW-10170P-A, "Statistical Core Design for Mixing Vane Cores."
16. EMF-2103 (P)(A), "Realistic Large Break LOCA Methodology for Pressurized Water Reactors."
17. EMF-96-029 (P)(A), "Reactor Analysis System for PWRs."
18. BAW-10168P-A, "RSG LOCA - BWNT Loss-of-Coolant Accident Evaluation Model for Recirculating Steam Generator Plants," Volume II only (SBLOCA models).

- 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 midcycle revisions or supplements, shall be provided upon issuance for each reload cycle to the NRC.

5.6.6 PAM Report

When a report is required by Condition B of LCO 3.3.3, "Post Accident Monitoring (PAM) Instrumentation," a report shall be submitted within the following 14 days. The report shall outline the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status.

5.6.7 Steam Generator Tube Inspection Report

A report shall be submitted within 180 days after the initial entry into MODE 4 following completion of an inspection performed in accordance with the Specification 5.5.8, "Steam Generator (SG) Program." The report shall include:

- a. The scope of inspections performed on each SG,
- b. Active degradation mechanisms found,

5.6 Reporting Requirements

5.6.7 Steam Generator Tube Inspection Report (continued)

- 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,
 - g. The results of condition monitoring, including the results of tube pulls and in-situ testing, and
 - h. The effective plugging percentage for all plugging in each SG.
-
-

Attachment 4

Mark-up of Technical Specifications Bases Changes

(For Information Only)

**North Anna Power Station
Units 1 and 2
Virginia Electric and Power Company
(Dominion)**

B 3.4.20 Steam Generator (SG) Tube Integrity B.3.4.20-1

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BASES

APPLICABLE
SAFETY ANALYSES
(continued)

Both transient and steady state analyses have been performed to establish the effect of flow on the departure from nucleate boiling (DNB). The transient and accident analyses for the unit have been performed assuming three RCS loops are in operation. The majority of the unit safety analyses are based on initial conditions at high core power or zero power. The accident analyses that are most important to RCP operation are the complete loss of forced reactor flow, single reactor coolant pump locked rotor, partial loss of forced reactor flow, and rod withdrawal events (Ref. 1).

The DNB analyses assume normal three loop operation. Uncertainties in key unit operating parameters, nuclear and thermal parameters, and fuel fabrication parameters are considered statistically such that there is at least a 95 percent probability that DNB will not occur for the limiting power rod. Key unit parameter uncertainties are used to determine the unit departure from nucleate boiling ratio (DNBR) uncertainty. This DNBR uncertainty, combined with the DNBR limit, establishes a design DNBR value which must be met in unit safety analyses and is used to determine the pressure and temperature Safety Limit (SL). Since the parameter uncertainties are considered in determining the design DNBR value, the unit safety analyses are performed using values of input parameters without uncertainties. Therefore, nominal operating values for reactor coolant flow are used in the accident analyses.

The unit is designed to operate with all RCS loops in operation to maintain DNBR above the limit during all normal operations and anticipated transients. By ensuring heat transfer in the nucleate boiling region, adequate heat transfer is provided between the fuel cladding and the reactor coolant.

RCS Loops—MODES 1 and 2 satisfy Criterion 2 of 10 CFR 50.36(c)(2)(ii).

LCO

The purpose of this LCO is to require an adequate forced flow rate for core heat removal. Flow is represented by the number of RCPs in operation for removal of heat by the SGs. To meet safety analysis acceptance criteria for DNBR, three pumps are required at rated power.

An OPERABLE RCS loop consists of an OPERABLE RCP in operation providing forced flow for heat transport and an OPERABLE SG. ~~in accordance with the Steam Generator Surveillance Program.~~

BASES

LCO
(continued)

Utilization of the Note is permitted provided the following conditions are met, along with any other conditions imposed by initial startup test procedures:

- a. No operations are permitted that would dilute the RCS boron concentration with coolant at boron concentrations less than required to ensure the SDM of LCO 3.1.1, thereby maintaining the margin to criticality. Boron reduction with coolant at boron concentrations less than required to assure the SDM is maintained is prohibited because a uniform concentration distribution throughout the RCS cannot be ensured when in natural circulation; and
- b. Core outlet temperature is maintained at least 10°F below saturation temperature, so that no vapor bubble may form and possibly cause a natural circulation flow obstruction.

An OPERABLE RCS loop consists of one OPERABLE RCP and one OPERABLE SG, ~~in accordance with the Steam Generator Tube Surveillance Program~~, which has the minimum water level specified in SR 3.4.5.2. An RCP is OPERABLE if it is capable of being powered and is able to provide forced flow if required.

APPLICABILITY

In MODE 3, this LCO ensures forced circulation of the reactor coolant to remove decay heat from the core and to provide proper boron mixing.

Operation in other MODES is covered by:

- LCO 3.4.4, "RCS Loops-MODES 1 and 2";
- LCO 3.4.6, "RCS Loops-MODE 4";
- LCO 3.4.7, "RCS Loops-MODE 5, Loops Filled";
- LCO 3.4.8, "RCS Loops-MODE 5, Loops Not Filled";
- LCO 3.9.5, "Residual Heat Removal (RHR) and Coolant Circulation-High Water Level" (MODE 6); and
- LCO 3.9.6, "Residual Heat Removal (RHR) and Coolant Circulation-Low Water Level" (MODE 6).

BASES

LCO
(continued)

≤ 280°F. This restraint is to prevent a low temperature overpressure event due to a thermal transient when an RCP is started.

An OPERABLE RCS loop is comprised of an OPERABLE RCP and an OPERABLE SG, ~~in accordance with the Steam Generator Tube Surveillance Program~~, which has the minimum water level specified in SR 3.4.6.2.

Similarly for the RHR System, an OPERABLE RHR loop is comprised of an OPERABLE RHR pump capable of providing forced flow to an OPERABLE RHR heat exchanger. RCPs and RHR pumps are OPERABLE if they are capable of being powered and are able to provide forced flow if required.

APPLICABILITY

In MODE 4, this LCO ensures forced circulation of the reactor coolant to remove decay heat from the core and to provide proper boron mixing. One loop of either RCS or RHR provides sufficient circulation for these purposes. However, two loops consisting of any combination of RCS and RHR loops are required to be OPERABLE to provide redundancy for heat removal.

Operation in other MODES is covered by:

- LCO 3.4.4, "RCS Loops—MODES 1 and 2";
 - LCO 3.4.5, "RCS Loops—MODE 3";
 - LCO 3.4.7, "RCS Loops—MODE 5, Loops Filled";
 - LCO 3.4.8, "RCS Loops—MODE 5, Loops Not Filled";
 - LCO 3.9.5, "Residual Heat Removal (RHR) and Coolant Circulation—High Water Level" (MODE 6); and
 - LCO 3.9.6, "Residual Heat Removal (RHR) and Coolant Circulation—Low Water Level" (MODE 6).
-

ACTIONS

A.1

If one required loop is inoperable, redundancy for heat removal is lost. Action must be initiated to restore a second RCS or RHR loop to OPERABLE status. The immediate Completion Time reflects the importance of maintaining the availability of two paths for heat removal.

BASES

LCO
(continued)

Utilization of Note 1 is permitted provided the following conditions are met, along with any other conditions imposed by initial startup test procedures:

- a. No operations are permitted that would dilute the RCS boron concentration with coolant at boron concentrations less than required to meet the SDM of LCO 3.1.1, therefore maintaining the margin to criticality. Boron reduction with coolant at boron concentrations less than required to assure the SDM is maintained is prohibited because a uniform concentration distribution throughout the RCS cannot be ensured when in natural circulation; and
- b. Core outlet temperature is maintained at least 10°F below saturation temperature, so that no vapor bubble may form and possibly cause a natural circulation flow obstruction.

Note 2 allows one RHR loop to be inoperable for a period of up to 2 hours, provided that the other RHR loop is OPERABLE and in operation. This permits periodic surveillance tests to be performed on the inoperable loop during the only time when such testing is safe and possible.

Note 3 requires that the secondary side water temperature of each SG be $\leq 50^{\circ}\text{F}$ above each of the RCS cold leg temperatures before the start of a reactor coolant pump (RCP) with an RCS cold leg temperature $\leq 280^{\circ}\text{F}$. This restriction is to prevent a low temperature overpressure event due to a thermal transient when an RCP is started.

Note 4 provides for an orderly transition from MODE 5 to MODE 4 during a planned heatup by permitting removal of RHR loops from operation when at least one RCS loop is in operation. This Note provides for the transition to MODE 4 where an RCS loop is permitted to be in operation and replaces the RCS circulation function provided by the RHR loops with circulation provided by an RCP.

RHR pumps are OPERABLE if they are capable of being powered and are able to provide flow if required. An OPERABLE SG can perform as a heat sink via natural circulation when it has an adequate water level and is OPERABLE, ~~in accordance with the Steam Generator Tube Surveillance Program.~~

BASES

APPLICABLE
SAFETY ANALYSES

Except for primary to secondary LEAKAGE, the safety analyses do not address operational LEAKAGE. However, other operational LEAKAGE is related to the safety analyses for LOCA; the amount of leakage can affect the probability of such an event. The safety analysis for an event resulting in steam discharge to the atmosphere assumes a 1 gpm primary to secondary LEAKAGE as the initial condition.

INSERT
B 3.4.13A

Primary to secondary LEAKAGE is a factor in the dose releases outside containment resulting from a main steam line break (MSLB) accident. Other accidents or transients involve secondary steam release to the atmosphere, such as a steam generator tube rupture (SGTR). The leakage contaminates the secondary fluid.

The UFSAR (Ref. 3) analysis for SGTR assumes the contaminated secondary fluid is released via power operated relief valves or safety valves. The source term in the primary system coolant is transported to the affected (ruptured) steam generator by the break flow. The affected steam generator discharges steam to the environment for 30 minutes until the generator is manually isolated. The 1 gpm primary to secondary LEAKAGE transports the source term to the unaffected steam generators. Releases continue through the unaffected steam generators until the Residual Heat Removal System is placed in service.

The MSLB is less limiting for site radiation releases than the SGTR. The safety analysis for the MSLB accident assumes 1 gpm primary to secondary LEAKAGE as an initial condition. The dose consequences resulting from the MSLB and SGTR accidents are within the limits defined in the staff approved licensing basis.

The RCS operational LEAKAGE satisfies Criterion 2 of 10 CFR 50.36(c)(2)(ii).

LCO

RCS operational LEAKAGE shall be limited to:

a. Pressure Boundary LEAKAGE

No pressure boundary LEAKAGE is allowed, being indicative of material deterioration. LEAKAGE of this type is unacceptable as the leak itself could cause further deterioration, resulting in higher LEAKAGE. Violation of
(continued)

BASES

LCO
(continued)

a. Pressure Boundary LEAKAGE (continued)

this LCO could result in continued degradation of the RCPB. LEAKAGE past seals and gaskets is not pressure boundary LEAKAGE.

b. Unidentified LEAKAGE

One gallon per minute (gpm) of unidentified LEAKAGE is allowed as a reasonable minimum detectable amount that the containment air monitoring and containment sump level monitoring equipment can detect within a reasonable time period. Violation of this LCO could result in continued degradation of the RCPB, if the LEAKAGE is from the pressure boundary.

c. Identified LEAKAGE

Up to 10 gpm of identified LEAKAGE is considered allowable because LEAKAGE is from known sources that do not interfere with detection of unidentified LEAKAGE and is well within the capability of the RCS Makeup System. Identified LEAKAGE includes LEAKAGE to the containment from specifically known and located sources, but does not include pressure boundary LEAKAGE or controlled reactor coolant pump (RCP) seal leakoff (a normal function not considered LEAKAGE). Violation of this LCO could result in continued degradation of a component or system.

~~d. Primary to Secondary LEAKAGE through All Steam Generators (SGs)~~

~~Total primary to secondary LEAKAGE amounting to 1 gpm through all SGs produces acceptable offsite doses in the SLB accident analysis. Violation of this LCO could exceed the offsite dose limits for this accident. Primary to secondary LEAKAGE must be included in the total allowable limit for identified LEAKAGE.~~

~~d. Primary to Secondary LEAKAGE through Any One SG~~

~~The 500 gallons per day limit on one SG 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 rupture. If leaked through many cracks, the cracks are very small, and the above assumption is conservative.~~

INSERT
B 3.4.13B

BASES

APPLICABILITY In MODES 1, 2, 3, and 4, the potential for RCPB LEAKAGE is greatest when the RCS is pressurized.

In MODES 5 and 6, LEAKAGE limits are not required because the reactor coolant pressure is far lower, resulting in lower stresses and reduced potentials for LEAKAGE.

LCO 3.4.14, "RCS Pressure Isolation Valve (PIV) Leakage," measures leakage through each individual PIV and can impact this LCO. Of the two PIVs in series in each isolated line, leakage measured through one PIV does not result in RCS LEAKAGE when the other is leak tight. If both valves leak and result in a loss of mass from the RCS, the loss must be included in the allowable identified LEAKAGE.

ACTIONS

A.1

Unidentified LEAKAGE, ^{OR} identified LEAKAGE, ~~or primary to secondary LEAKAGE~~ in excess of the LCO limits must be reduced to within limits within 4 hours. This Completion 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 RCPB.

B.1 and B.2

or primary to secondary LEAKAGE IS NOT WITHIN LIMITS

If any pressure boundary LEAKAGE exists, ^{OR} if unidentified LEAKAGE, ~~identified LEAKAGE, or primary to secondary 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 its potential consequences. It should be noted that LEAKAGE past seals and gaskets is not pressure boundary LEAKAGE. The reactor must be brought to MODE 3 within 6 hours and MODE 5 within 36 hours. This action reduces the LEAKAGE and also reduces the factors that tend to degrade the pressure boundary.

The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems. In MODE 5, the pressure stresses acting on the RCPB are much lower, and further deterioration is much less likely.

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.4.13.1

Verifying RCS LEAKAGE to be within the LCO limits ensures the integrity of the RCPB 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. ~~Primary to secondary LEAKAGE is also measured by performance of an RCS water inventory balance in conjunction with effluent monitoring within the secondary steam and feedwater systems.~~

The surveillance is modified by two Notes.

The RCS water inventory balance must be met with the reactor at steady state operating conditions (stable temperature, power level, pressurizer and makeup tank levels, makeup and letdown, and RCP seal injection and return flows). ~~Therefore, a Note is added allowing that this SR 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.~~

1 states

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 RCP seal injection and return flows.

An early warning of pressure boundary LEAKAGE or unidentified LEAKAGE is provided by the automatic systems that monitor the containment atmosphere radioactivity and the containment sump level. It should be noted that LEAKAGE past seals and gaskets is not pressure boundary LEAKAGE. These leakage detection systems are specified in LCO 3.4.15, "RCS Leakage Detection Instrumentation."

*INSERT
B 3.4.13.C*

The 72 hour Frequency is a reasonable interval to trend LEAKAGE and recognizes the importance of early leakage detection in the prevention of accidents.

BASES

SURVEILLANCE
REQUIREMENTS
(continued)

SR 3.4.13.2

~~This SR provides the means necessary to determine SG OPERABILITY in an operational MODE. The requirement to demonstrate SG tube integrity in accordance with the Steam Generator Tube Surveillance Program emphasizes the importance of SG tube integrity, even though this Surveillance cannot be performed at normal operating conditions.~~

INSERT
B 3.4.13.D

REFERENCES

1. UFSAR, Section 3.1.26.
2. Regulatory Guide 1.45, May 1973.
3. UFSAR, Chapter 15.

INSERT
B 3.4.13.E

INSERT B 3.4.13 A

that primary to secondary LEAKAGE from all steam generators (SGs) is one gallon per minute or increases to one gallon per minute as a result of accident induced conditions. The LCO requirement to limit primary to secondary LEAKAGE through any one SG to less than or equal to 150 gallons per day is significantly less than the conditions assumed in the safety analysis.

INSERT B 3.4.13 B

The limit of 150 gallons per day per SG is based on the operational LEAKAGE performance criterion in NEI 97-06, Steam Generator Program Guidelines (Ref. 4). 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 SG 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.

INSERT B 3.4.13 C

Note 2 states that this SR is not applicable to primary to secondary LEAKAGE because LEAKAGE of 150 gallons per day cannot be measured accurately by an RCS water inventory balance.

INSERT B 3.4.13 D

This SR verifies that primary to secondary LEAKAGE is less than or equal to 150 gallons per day through any one SG. Satisfying the primary to secondary LEAKAGE limit ensures that the operational LEAKAGE performance criterion in the Steam Generator Program is met. If this SR is not met, compliance with LCO 3.4.20, "Steam Generator Tube Integrity," should be evaluated. The 150 gallons per day limit is measured at room temperature as described in Reference 5. The operational LEAKAGE rate limit applies to LEAKAGE through any one SG. If it is not practical to assign the LEAKAGE to an individual SG, all the primary to secondary LEAKAGE should be conservatively assumed to be from one SG.

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 RCP 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 the EPRI guidelines (Ref. 5).

INSERT B 3.4.13 E

4. NEI 97-06, "Steam Generator Program Guidelines."
5. EPRI, "Pressurized Water Reactor Primary-to-Secondary Leak Guidelines."

INSERT NEW B 3.4.20
P 3.4.20-1 THROUGH 8.

SG Tube Integrity
B 3.4.20

B 3.4 REACTOR COOLANT SYSTEM (RCS)

B 3.4.20 Steam Generator (SG) Tube Integrity

BASES

BACKGROUND

Steam generator (SG) tubes are small diameter, thin walled tubes that carry primary coolant through the primary to secondary heat exchangers. The SG tubes have a number of important safety functions. SG tubes are an integral part of the reactor coolant pressure boundary (RCPB) and, as such, are relied on to maintain the primary system's pressure and inventory. The SG tubes isolate the radioactive fission products in the primary coolant from the secondary system. In addition, as part of the RCPB, the SG tubes are unique in that they act as the heat transfer surface between the primary and secondary systems to remove heat from the primary system. This Specification addresses only the RCPB integrity function of the SG. The SG heat removal function is addressed by LCO 3.4.4, "RCS Loops-MODES 1 and 2," LCO 3.4.5, "RCS Loops-MODE 3," LCO 3.4.6, "RCS Loops-MODE 4," and LCO 3.4.7, "RCS Loops-MODE 5, Loops Filled."

SG tube integrity means that the tubes are capable of performing their intended RCPB safety function consistent with the licensing basis, including applicable regulatory requirements.

SG tubing is subject to a variety of degradation mechanisms. SG tubes may experience tube degradation related to corrosion phenomena, such as wastage, pitting, intergranular attack, and stress corrosion cracking, along with other mechanically induced phenomena such as denting and wear. These degradation mechanisms can impair tube integrity if they are not managed effectively. The SG performance criteria are used to manage SG tube degradation.

Specification 5.5.8, "Steam Generator (SG) Program," requires that a program be established and implemented to ensure that SG tube integrity is maintained. Pursuant to Specification 5.5.8, tube integrity is maintained when the SG performance criteria are met. There are three SG performance criteria: structural integrity, accident induced leakage, and operational LEAKAGE. The SG performance criteria are described in Specification 5.5.8. Meeting the

(continued)

BASES

BACKGROUND
(continued)

SG performance criteria provides reasonable assurance of maintaining tube integrity at normal and accident conditions.

The processes used to meet the SG performance criteria are defined by the Steam Generator Program Guidelines (Ref. 1).

APPLICABLE
SAFETY ANALYSES

The steam generator tube rupture (SGTR) accident is the limiting basis event for SG tubes and avoiding a SGTR is the basis for this Specification. The analysis of a SGTR event assumes a bounding primary to secondary LEAKAGE rate of 1 gpm, which is conservative with respect to the operational LEAKAGE rate limits in LCO 3.4.13, "RCS Operational LEAKAGE," plus the leakage rate associated with a double-ended rupture of a single tube. The UFSAR analysis for SGTR assumes the contaminated secondary fluid is released via power operated relief valves or safety valves. The source term in the primary system coolant is transported to the affected (ruptured) steam generator by the break flow. The affected steam generator discharges steam to the environment for 30 minutes until the generator is manually isolated. The 1 gpm primary to secondary LEAKAGE transports the source term to the unaffected steam generators. Releases continue through the unaffected steam generators until the Residual Heat Removal System is placed in service.

The analysis for design basis accidents and transients other than a SGTR assume the SG tubes retain their structural integrity (i.e., they are assumed not to rupture.) In these analyses, the steam discharge to the atmosphere is based on the total primary to secondary LEAKAGE from all SGs of 1 gallon per minute or is assumed to increase to 1 gallon per minute as a result of accident induced conditions. For accidents that do not involve fuel damage, the primary coolant activity level of DOSE EQUIVALENT I-131 is assumed to be equal to the LCO 3.4.16, "RCS Specific Activity," limits. For accidents that assume fuel damage, the primary coolant activity is a function of the amount of activity released from the damaged fuel. The dose consequences of these events are within the limits of GDC 19 (Ref. 2), 10 CFR 50.67 (Ref. 3) or RG 1.183 (Ref. 4), as appropriate.

SG tube integrity satisfies Criterion 2 of 10 CFR 50.36(c)(2)(ii).

BASES

LCO

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 5.5.8, "Steam Generator 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 have a significant effect on burst or collapse. In that context, the term "significant" is defined as "An accident loading condition other than differential pressure is considered significant

(continued)

BASES

LCO
(continued)

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." 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 (Ref. 5) and Draft Regulatory Guide 1.121 (Ref. 6).

The accident induced leakage performance criterion ensures that the primary to secondary LEAKAGE caused by a design basis accident, other than a SGTR, is within the accident analysis assumptions. The accident analysis assumes that accident induced leakage does not exceed 1 gpm. 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 3.4.13, "RCS 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.

APPLICABILITY

SG tube integrity is challenged when the pressure differential across the tubes is large. Large differential pressures across SG tubes can only be experienced in MODE 1, 2, 3, or 4.

(continued)

BASES

APPLICABILITY
(continued)

SG integrity limits are not provided in MODES 5 and 6 since RCS conditions are far less challenging than in MODES 5 and 6 than during MODES 1, 2, 3, and 4. In MODES 5 and 6, primary to secondary differential pressure is low, resulting in lower stresses and reduced potential for LEAKAGE.

ACTIONS

The ACTIONS are modified by a Note clarifying that separate Conditions entry is permitted for each SG tube. This is acceptable because the Required Actions provide appropriate compensatory actions for each affected SG tube. Complying with the Required Actions may allow for continued operation, and subsequent affected SG tubes are governed by subsequent Condition entry and application of associated Required Actions.

A.1 and A.2

Condition A applies 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 as required by SR 3.4.20.2. 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. If it is determined that tube integrity is not being maintained, Condition B applies.

A Completion Time of 7 days is sufficient to complete the evaluation while minimizing the risk of plant operation with a SG tube that may not have tube integrity.

If the evaluation determines that the affected tube(s) have tube integrity, Required Action A.2 allows plant operation to continue until the next refueling outage or SG inspection provided the inspection interval continues to be supported
(continued)

BASES

ACTIONS

A.1 and A.2 (continued)

by an operational assessment that reflects the affected tubes. However, the affected tube(s) must be plugged prior to entering MODE 4 following the next refueling outage or SG inspection. This Completion Time is acceptable since operation until the next inspection is supported by the operational assessment.

B.1 and B.2

If the Required Actions and associated Completion Times of Condition A are not met or if SG tube integrity is not being maintained, the reactor must be brought to MODE 3 within 6 hours and MODE 5 within 36 hours.

The allowed Completion 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.

SURVEILLANCE
REQUIREMENTS

SR 3.4.20.1

During shutdown periods the SGs are inspected as required by this SR and the Steam Generator Program. NEI 97-06, Steam Generator Program Guidelines (Ref. 1), 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 potential degradation. Inspection methods are a

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.4.20.1 (continued)

function of degradation morphology, non-destructive examination (NDE) technique capabilities, and inspection locations.

The Steam Generator Program defines the Frequency of SR 3.4.20.1. The Frequency is determined by the operational assessment and other limits in the SG examination guidelines (Ref. 7). 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 5.5.8 contains prescriptive requirements concerning inspection intervals to provide added assurance that the SG performance criteria will be met between scheduled inspections.

SR 3.4.20.2

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 5.5.8 are intended to ensure that tubes accepted for continued service satisfy the SG performance criteria with allowance for error in the flaw size measurement and for future flaw 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). Reference 1 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 MODE 4 following a SG inspection 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.

REFERENCES

1. NEI 97-06, "Steam Generator Program Guidelines."
2. 10 CFR 50 Appendix A, GDC 19.
3. 10 CFR 50.67.

BASES

REFERENCES
(continued)

4. RG 1.183, July 2000.
 5. ASME Boiler and Pressure Vessel Code, Section III, Subsection NB.
 6. Draft Regulatory Guide 1.121, "Basis for Plugging Degraded Steam Generator Tubes," August 1976.
 7. EPRI, "Pressurized Water Reactor Steam Generator Examination Guidelines."
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Attachment 5

Proposed Technical Specifications Bases Changes

(For Information Only)

**North Anna Power Station
Units 1 and 2
Virginia Electric and Power Company
(Dominion)**

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BASES

APPLICABLE
SAFETY ANALYSES
(continued)

Both transient and steady state analyses have been performed to establish the effect of flow on the departure from nucleate boiling (DNB). The transient and accident analyses for the unit have been performed assuming three RCS loops are in operation. The majority of the unit safety analyses are based on initial conditions at high core power or zero power. The accident analyses that are most important to RCP operation are the complete loss of forced reactor flow, single reactor coolant pump locked rotor, partial loss of forced reactor flow, and rod withdrawal events (Ref. 1).

The DNB analyses assume normal three loop operation. Uncertainties in key unit operating parameters, nuclear and thermal parameters, and fuel fabrication parameters are considered statistically such that there is at least a 95 percent probability that DNB will not occur for the limiting power rod. Key unit parameter uncertainties are used to determine the unit departure from nucleate boiling ratio (DNBR) uncertainty. This DNBR uncertainty, combined with the DNBR limit, establishes a design DNBR value which must be met in unit safety analyses and is used to determine the pressure and temperature Safety Limit (SL). Since the parameter uncertainties are considered in determining the design DNBR value, the unit safety analyses are performed using values of input parameters without uncertainties. Therefore, nominal operating values for reactor coolant flow are used in the accident analyses.

The unit is designed to operate with all RCS loops in operation to maintain DNBR above the limit during all normal operations and anticipated transients. By ensuring heat transfer in the nucleate boiling region, adequate heat transfer is provided between the fuel cladding and the reactor coolant.

RCS Loops—MODES 1 and 2 satisfy Criterion 2 of 10 CFR 50.36(c)(2)(ii).

LCO

The purpose of this LCO is to require an adequate forced flow rate for core heat removal. Flow is represented by the number of RCPs in operation for removal of heat by the SGs. To meet safety analysis acceptance criteria for DNBR, three pumps are required at rated power.

An OPERABLE RCS loop consists of an OPERABLE RCP in operation providing forced flow for heat transport and an OPERABLE SG. |

BASES

LCO
(continued)

Utilization of the Note is permitted provided the following conditions are met, along with any other conditions imposed by initial startup test procedures:

- a. No operations are permitted that would dilute the RCS boron concentration with coolant at boron concentrations less than required to ensure the SDM of LCO 3.1.1, thereby maintaining the margin to criticality. Boron reduction with coolant at boron concentrations less than required to assure the SDM is maintained is prohibited because a uniform concentration distribution throughout the RCS cannot be ensured when in natural circulation; and
- b. Core outlet temperature is maintained at least 10°F below saturation temperature, so that no vapor bubble may form and possibly cause a natural circulation flow obstruction.

An OPERABLE RCS loop consists of one OPERABLE RCP and one OPERABLE SG, which has the minimum water level specified in SR 3.4.5.2. An RCP is OPERABLE if it is capable of being powered and is able to provide forced flow if required.

APPLICABILITY

In MODE 3, this LCO ensures forced circulation of the reactor coolant to remove decay heat from the core and to provide proper boron mixing.

Operation in other MODES is covered by:

- LCO 3.4.4, "RCS Loops—MODES 1 and 2";
- LCO 3.4.6, "RCS Loops—MODE 4";
- LCO 3.4.7, "RCS Loops—MODE 5, Loops Filled";
- LCO 3.4.8, "RCS Loops—MODE 5, Loops Not Filled";
- LCO 3.9.5, "Residual Heat Removal (RHR) and Coolant Circulation—High Water Level" (MODE 6); and
- LCO 3.9.6, "Residual Heat Removal (RHR) and Coolant Circulation—Low Water Level" (MODE 6).

ACTIONS

A.1

If one required RCS loop is inoperable, redundancy for heat removal is lost. The Required Action is restoration of the required RCS loop to OPERABLE status within the Completion
(continued)

BASES

ACTIONS

A.1 (continued)

Time of 72 hours. This time allowance is a justified period to be without the redundant, nonoperating loop because a single loop in operation has a heat transfer capability greater than that needed to remove the decay heat produced in the reactor core and because of the low probability of a failure in the remaining loop occurring during this period.

B.1

If restoration is not possible within 72 hours, the unit must be brought to MODE 4. In MODE 4, the unit may be placed on the Residual Heat Removal System. The additional Completion Time of 12 hours is compatible with required operations to achieve cooldown and depressurization from the existing unit conditions in an orderly manner and without challenging unit systems.

C.1, C.2, and C.3

If two required RCS loops are inoperable or a required RCS loop is not in operation, except as during conditions permitted by the Note in the LCO section, place the Rod Control System in a condition incapable of rod withdrawal (e.g., all CRDMs must be de-energized by opening the RTBs or de-energizing the MG sets). All operations involving introduction of coolant into the RCS with boron concentration less than required to meet the minimum SDM of LCO 3.1.1 must be suspended, and action to restore one of the RCS loops to OPERABLE status and operation must be initiated. Boron dilution requires forced circulation for proper mixing, and opening the RTBs or de-energizing the MG sets removes the possibility of an inadvertent rod withdrawal. Suspending the introduction of coolant into the RCS of coolant with boron concentration less than required to meet the minimum SDM of LCO 3.1.1 is required to assure continued safe operation. With coolant added without forced circulation, unmixed coolant could be introduced to the core, however coolant added with boron concentration meeting the minimum SDM maintains acceptable margin to subcritical operations. The immediate Completion Time reflects the importance of maintaining operation for heat removal. The action to restore must be continued until one loop is restored to OPERABLE status and operation.

BASES

LCO (continued) ≤ 280°F. This restraint is to prevent a low temperature overpressure event due to a thermal transient when an RCP is started.

An OPERABLE RCS loop is comprised of an OPERABLE RCP and an OPERABLE SG, which has the minimum water level specified in SR 3.4.6.2.

Similarly for the RHR System, an OPERABLE RHR loop is comprised of an OPERABLE RHR pump capable of providing forced flow to an OPERABLE RHR heat exchanger. RCPs and RHR pumps are OPERABLE if they are capable of being powered and are able to provide forced flow if required.

APPLICABILITY In MODE 4, this LCO ensures forced circulation of the reactor coolant to remove decay heat from the core and to provide proper boron mixing. One loop of either RCS or RHR provides sufficient circulation for these purposes. However, two loops consisting of any combination of RCS and RHR loops are required to be OPERABLE to provide redundancy for heat removal.

Operation in other MODES is covered by:

- LCO 3.4.4, "RCS Loops—MODES 1 and 2";
 - LCO 3.4.5, "RCS Loops—MODE 3";
 - LCO 3.4.7, "RCS Loops—MODE 5, Loops Filled";
 - LCO 3.4.8, "RCS Loops—MODE 5, Loops Not Filled";
 - LCO 3.9.5, "Residual Heat Removal (RHR) and Coolant Circulation—High Water Level" (MODE 6); and
 - LCO 3.9.6, "Residual Heat Removal (RHR) and Coolant Circulation—Low Water Level" (MODE 6).
-

ACTIONS

A.1

If one required loop is inoperable, redundancy for heat removal is lost. Action must be initiated to restore a second RCS or RHR loop to OPERABLE status. The immediate Completion Time reflects the importance of maintaining the availability of two paths for heat removal.

BASES

LCO
(continued)

Utilization of Note 1 is permitted provided the following conditions are met, along with any other conditions imposed by initial startup test procedures:

- a. No operations are permitted that would dilute the RCS boron concentration with coolant at boron concentrations less than required to meet the SDM of LCO 3.1.1, therefore maintaining the margin to criticality. Boron reduction with coolant at boron concentrations less than required to assure the SDM is maintained is prohibited because a uniform concentration distribution throughout the RCS cannot be ensured when in natural circulation; and
- b. Core outlet temperature is maintained at least 10°F below saturation temperature, so that no vapor bubble may form and possibly cause a natural circulation flow obstruction.

Note 2 allows one RHR loop to be inoperable for a period of up to 2 hours, provided that the other RHR loop is OPERABLE and in operation. This permits periodic surveillance tests to be performed on the inoperable loop during the only time when such testing is safe and possible.

Note 3 requires that the secondary side water temperature of each SG be $\leq 50^{\circ}\text{F}$ above each of the RCS cold leg temperatures before the start of a reactor coolant pump (RCP) with an RCS cold leg temperature $\leq 280^{\circ}\text{F}$. This restriction is to prevent a low temperature overpressure event due to a thermal transient when an RCP is started.

Note 4 provides for an orderly transition from MODE 5 to MODE 4 during a planned startup by permitting removal of RHR loops from operation when at least one RCS loop is in operation. This Note provides for the transition to MODE 4 where an RCS loop is permitted to be in operation and replaces the RCS circulation function provided by the RHR loops with circulation provided by an RCP.

RHR pumps are OPERABLE if they are capable of being powered and are able to provide flow if required. A SG can perform as a heat sink via natural circulation when it has an adequate water level and is OPERABLE.

BASES

APPLICABLE
SAFETY ANALYSES

Except for primary to secondary LEAKAGE, the safety analyses do not address operational LEAKAGE. However, other operational LEAKAGE is related to the safety analyses for LOCA; the amount of leakage can affect the probability of such an event. The safety analysis for an event resulting in steam discharge to the atmosphere assumes that primary to secondary LEAKAGE from all steam generators (SGs) is one gallon per minute or increases to one gallon per minute as a result of accident induced conditions. The LCO requirement to limit primary to secondary LEAKAGE through any one SG to less than or equal to 150 gallons per day is significantly less than the conditions assumed in the safety analysis.

Primary to secondary LEAKAGE is a factor in the dose releases outside containment resulting from a main steam line break (MSLB) accident. Other accidents or transients involve secondary steam release to the atmosphere, such as a steam generator tube rupture (SGTR). The leakage contaminates the secondary fluid.

The UFSAR (Ref. 3) analysis for SGTR assumes the contaminated secondary fluid is released via power operated relief valves or safety valves. The source term in the primary system coolant is transported to the affected (ruptured) steam generator by the break flow. The affected steam generator discharges steam to the environment for 30 minutes until the generator is manually isolated. The 1 gpm primary to secondary LEAKAGE transports the source term to the unaffected steam generators. Releases continue through the unaffected steam generators until the Residual Heat Removal System is placed in service.

The MSLB is less limiting for site radiation releases than the SGTR. The safety analysis for the MSLB accident assumes 1 gpm primary to secondary LEAKAGE as an initial condition. The dose consequences resulting from the MSLB and SGTR accidents are within the limits defined in the staff approved licensing basis.

The RCS operational LEAKAGE satisfies Criterion 2 of 10 CFR 50.36(c)(2)(ii).

BASES

LCO

RCS operational LEAKAGE shall be limited to:

a. Pressure Boundary LEAKAGE

No pressure boundary LEAKAGE is allowed, being indicative of material deterioration. LEAKAGE of this type is unacceptable as the leak itself could cause further deterioration, resulting in higher LEAKAGE. Violation of this LCO could result in continued degradation of the RCPB. LEAKAGE past seals and gaskets is not pressure boundary LEAKAGE.

b. Unidentified LEAKAGE

One gallon per minute (gpm) of unidentified LEAKAGE is allowed as a reasonable minimum detectable amount that the containment air monitoring and containment sump level monitoring equipment can detect within a reasonable time period. Violation of this LCO could result in continued degradation of the RCPB, if the LEAKAGE is from the pressure boundary.

c. Identified LEAKAGE

Up to 10 gpm of identified LEAKAGE is considered allowable because LEAKAGE is from known sources that do not interfere with detection of unidentified LEAKAGE and is well within the capability of the RCS Makeup System. Identified LEAKAGE includes LEAKAGE to the containment from specifically known and located sources, but does not include pressure boundary LEAKAGE or controlled reactor coolant pump (RCP) seal leakoff (a normal function not considered LEAKAGE). Violation of this LCO could result in continued degradation of a component or system.

d. Primary to Secondary LEAKAGE through Any One SG

The limit of 150 gallons per day per SG is based on the operational LEAKAGE performance criterion in NEI 97-06, Steam Generator Program Guidelines (Ref. 4). 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 SG tube degradation mechanisms that result in tube leakage. The operational leakage

(continued)

BASES

LCO d. Primary to Secondary LEAKAGE through Any One SG
 (continued)

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.

APPLICABILITY In MODES 1, 2, 3, and 4, the potential for RCPB LEAKAGE is greatest when the RCS is pressurized.

In MODES 5 and 6, LEAKAGE limits are not required because the reactor coolant pressure is far lower, resulting in lower stresses and reduced potentials for LEAKAGE.

LCO 3.4.14, "RCS Pressure Isolation Valve (PIV) Leakage," measures leakage through each individual PIV and can impact this LCO. Of the two PIVs in series in each isolated line, leakage measured through one PIV does not result in RCS LEAKAGE when the other is leak tight. If both valves leak and result in a loss of mass from the RCS, the loss must be included in the allowable identified LEAKAGE.

ACTIONS A.1

Unidentified LEAKAGE or identified LEAKAGE in excess of the LCO limits must be reduced to within limits within 4 hours. This Completion 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 RCPB.

B.1 and B.2

If any pressure boundary LEAKAGE exists, or primary to secondary LEAKAGE is not within limit, or if unidentified LEAKAGE, 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 its potential consequences. It should be noted that LEAKAGE past seals and gaskets is not pressure boundary LEAKAGE. The reactor must be brought to MODE 3 within

(continued)

BASES

ACTIONS

B.1 and B.2 (continued)

6 hours and MODE 5 within 36 hours. This action reduces the LEAKAGE and also reduces the factors that tend to degrade the pressure boundary.

The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems. In MODE 5, the pressure stresses acting on the RCPB are much lower, and further deterioration is much less likely.

SURVEILLANCE
REQUIREMENTS

SR 3.4.13.1

Verifying RCS LEAKAGE to be within the LCO limits ensures the integrity of the RCPB 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 balance must be met with the reactor at steady state operating conditions (stable temperature, power level, pressurizer and makeup tank levels, makeup and letdown, and RCP seal injection and return flows). The surveillance is modified by two Notes. Note 1 states that this SR 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 RCP seal injection and return flows.

An early warning of pressure boundary LEAKAGE or unidentified LEAKAGE is provided by the automatic systems that monitor the containment atmosphere radioactivity and

(continued)

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.4.13.1 (continued)

the containment sump level. It should be noted that LEAKAGE past seals and gaskets is not pressure boundary LEAKAGE. These leakage detection systems are specified in LCO 3.4.15, "RCS Leakage Detection Instrumentation."

Note 2 states that this SR is not applicable to primary to secondary LEAKAGE because LEAKAGE of 150 gallons per day cannot be measured accurately by an RCS water inventory balance.

The 72 hour Frequency is a reasonable interval to trend LEAKAGE and recognizes the importance of early leakage detection in the prevention of accidents.

SR 3.4.13.2

This SR verifies that primary to secondary LEAKAGE is less than or equal to 150 gallons per day through any one SG. Satisfying the primary to secondary LEAKAGE limit ensures that the operational LEAKAGE performance criterion in the Steam Generator Program is met. If this SR is not met, compliance with LCO 3.4.20, "Steam Generator Tube Integrity," should be evaluated. The 150 gallons per day limit is measured at room temperature as described in Reference 5. The operational LEAKAGE rate limit applies to LEAKAGE through any one SG. If it is not practical to assign the LEAKAGE to an individual SG, all the primary to secondary LEAKAGE should be conservatively assumed to be from one SG.

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 RCP 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 the EPRI guidelines (Ref. 5).

BASES

REFERENCES

1. UFSAR, Section 3.1.26.
 2. Regulatory Guide 1.45, May 1973.
 3. UFSAR, Chapter 15.
 4. NEI 97-06, "Steam Generator Program Guidelines."
 5. EPRI, "Pressurized Water Reactor Primary-to-Secondary Leak Guidelines."
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B 3.4 REACTOR COOLANT SYSTEM (RCS)

B 3.4.20 Steam Generator (SG) Tube Integrity

BASES

BACKGROUND

Steam generator (SG) tubes are small diameter, thin walled tubes that carry primary coolant through the primary to secondary heat exchangers. The SG tubes have a number of important safety functions. SG tubes are an integral part of the reactor coolant pressure boundary (RCPB) and, as such, are relied on to maintain the primary system's pressure and inventory. The SG tubes isolate the radioactive fission products in the primary coolant from the secondary system. In addition, as part of the RCPB, the SG tubes are unique in that they act as the heat transfer surface between the primary and secondary systems to remove heat from the primary system. This Specification addresses only the RCPB integrity function of the SG. The SG heat removal function is addressed by LCO 3.4.4, "RCS Loops-MODES 1 and 2," LCO 3.4.5, "RCS Loops-MODE 3," LCO 3.4.6, "RCS Loops-MODE 4," and LCO 3.4.7, "RCS Loops-MODE 5, Loops Filled."

SG tube integrity means that the tubes are capable of performing their intended RCPB safety function consistent with the licensing basis, including applicable regulatory requirements.

SG tubing is subject to a variety of degradation mechanisms. SG tubes may experience tube degradation related to corrosion phenomena, such as wastage, pitting, intergranular attack, and stress corrosion cracking, along with other mechanically induced phenomena such as denting and wear. These degradation mechanisms can impair tube integrity if they are not managed effectively. The SG performance criteria are used to manage SG tube degradation.

Specification 5.5.8, "Steam Generator (SG) Program," requires that a program be established and implemented to ensure that SG tube integrity is maintained. Pursuant to Specification 5.5.8, tube integrity is maintained when the SG performance criteria are met. There are three SG performance criteria: structural integrity, accident induced leakage, and operational LEAKAGE. The SG performance criteria are described in Specification 5.5.8. Meeting the
(continued)

BASES

BACKGROUND
(continued)

SG performance criteria provides reasonable assurance of maintaining tube integrity at normal and accident conditions.

The processes used to meet the SG performance criteria are defined by the Steam Generator Program Guidelines (Ref. 1).

APPLICABLE
SAFETY ANALYSES

The steam generator tube rupture (SGTR) accident is the limiting basis event for SG tubes and avoiding a SGTR is the basis for this Specification. The analysis of a SGTR event assumes a bounding primary to secondary LEAKAGE rate of 1 gpm, which is conservative with respect to the operational LEAKAGE rate limits in LCO 3.4.13, "RCS Operational LEAKAGE," plus the leakage rate associated with a double-ended rupture of a single tube. The UFSAR analysis for SGTR assumes the contaminated secondary fluid is released via power operated relief valves or safety valves. The source term in the primary system coolant is transported to the affected (ruptured) steam generator by the break flow. The affected steam generator discharges steam to the environment for 30 minutes until the generator is manually isolated. The 1 gpm primary to secondary LEAKAGE transports the source term to the unaffected steam generators. Releases continue through the unaffected steam generators until the Residual Heat Removal System is placed in service.

The analysis for design basis accidents and transients other than a SGTR assume the SG tubes retain their structural integrity (i.e., they are assumed not to rupture.) In these analyses, the steam discharge to the atmosphere is based on the total primary to secondary LEAKAGE from all SGs of 1 gallon per minute or is assumed to increase to 1 gallon per minute as a result of accident induced conditions. For accidents that do not involve fuel damage, the primary coolant activity level of DOSE EQUIVALENT I-131 is assumed to be equal to the LCO 3.4.16, "RCS Specific Activity," limits. For accidents that assume fuel damage, the primary coolant activity is a function of the amount of activity released from the damaged fuel. The dose consequences of these events are within the limits of GDC 19 (Ref. 2), 10 CFR 50.67 (Ref. 3) or RG 1.183 (Ref. 4), as appropriate.

SG tube integrity satisfies Criterion 2 of 10 CFR 50.36(c)(2)(ii).

BASES

LCO

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 5.5.8, "Steam Generator 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 have a significant effect on burst or collapse. In that context, the term "significant" is defined as "An accident loading condition other than differential pressure is considered significant
(continued)

BASES

LCO
(continued)

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." 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 (Ref. 5) and Draft Regulatory Guide 1.121 (Ref. 6).

The accident induced leakage performance criterion ensures that the primary to secondary LEAKAGE caused by a design basis accident, other than a SGTR, is within the accident analysis assumptions. The accident analysis assumes that accident induced leakage does not exceed 1 gpm. 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 3.4.13, "RCS 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.

APPLICABILITY

SG tube integrity is challenged when the pressure differential across the tubes is large. Large differential pressures across SG tubes can only be experienced in MODE 1, 2, 3, or 4.

(continued)

BASES

APPLICABILITY
(continued) SG integrity limits are not provided in MODES 5 and 6 since RCS conditions are far less challenging than in MODES 5 and 6 than during MODES 1, 2, 3, and 4. In MODES 5 and 6, primary to secondary differential pressure is low, resulting in lower stresses and reduced potential for LEAKAGE.

ACTIONS The ACTIONS are modified by a Note clarifying that separate Conditions entry is permitted for each SG tube. This is acceptable because the Required Actions provide appropriate compensatory actions for each affected SG tube. Complying with the Required Actions may allow for continued operation, and subsequent affected SG tubes are governed by subsequent Condition entry and application of associated Required Actions.

A.1 and A.2

Condition A applies 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 as required by SR 3.4.20.2. 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. If it is determined that tube integrity is not being maintained, Condition B applies.

A Completion Time of 7 days is sufficient to complete the evaluation while minimizing the risk of plant operation with a SG tube that may not have tube integrity.

If the evaluation determines that the affected tube(s) have tube integrity, Required Action A.2 allows plant operation to continue until the next refueling outage or SG inspection provided the inspection interval continues to be supported
(continued)

BASES

ACTIONS

A.1 and A.2 (continued)

by an operational assessment that reflects the affected tubes. However, the affected tube(s) must be plugged prior to entering MODE 4 following the next refueling outage or SG inspection. This Completion Time is acceptable since operation until the next inspection is supported by the operational assessment.

B.1 and B.2

If the Required Actions and associated Completion Times of Condition A are not met or if SG tube integrity is not being maintained, the reactor must be brought to MODE 3 within 6 hours and MODE 5 within 36 hours.

The allowed Completion 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.

SURVEILLANCE
REQUIREMENTS

SR 3.4.20.1

During shutdown periods the SGs are inspected as required by this SR and the Steam Generator Program. NEI 97-06, Steam Generator Program Guidelines (Ref. 1), 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 potential degradation. Inspection methods are a

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.4.20.1 (continued)

function of degradation morphology, non-destructive examination (NDE) technique capabilities, and inspection locations.

The Steam Generator Program defines the Frequency of SR 3.4.20.1. The Frequency is determined by the operational assessment and other limits in the SG examination guidelines (Ref. 7). 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 5.5.8 contains prescriptive requirements concerning inspection intervals to provide added assurance that the SG performance criteria will be met between scheduled inspections.

SR 3.4.20.2

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 5.5.8 are intended to ensure that tubes accepted for continued service satisfy the SG performance criteria with allowance for error in the flaw size measurement and for future flaw 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). Reference 1 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 MODE 4 following a SG inspection 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.

REFERENCES

1. NEI 97-06, "Steam Generator Program Guidelines."
2. 10 CFR 50 Appendix A, GDC 19.
3. 10 CFR 50.67.

BASES

REFERENCES
(continued)

4. RG 1.183, July 2000.
 5. ASME Boiler and Pressure Vessel Code, Section III, Subsection NB.
 6. Draft Regulatory Guide 1.121, "Basis for Plugging Degraded Steam Generator Tubes," August 1976.
 7. EPRI, "Pressurized Water Reactor Steam Generator Examination Guidelines."
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