3. This renewed license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations: 10 CFR Part 20, Section 30.34 of 10 CFR Part 30, Section 40.41 of 10 CFR Part 40, Sections 50.54 and 50.59 of 10 CFR Part 50, and Section 70.32 of 10 CFR Part 70; and is subject to all applicable provisions of the Act and the ... rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified below:

## A. <u>Maximum Power Level</u>

The licensee is authorized to operate the facility at steady state reactor core power levels not in excess of 2546 megawatts (thermai).

#### B. <u>Technical Specifications</u>

The Technical Specifications contained in Appendix A, as revised through Amendment No. 251 are hereby incorporated in the renewed license. The licensee shall operate the facility in accordance with the Technical Specifications.

# C. <u>Reports</u>

The licensee shall make certain reports in accordance with the requirements of the Technical Specifications.

#### D. <u>Records</u>

The licensee shall keep facility operating records in accordance with the requirements of the Technical Specifications.

E. Deleted by Amendment 65

F. Deleted by Amendment 71

G. Deleted by Amendment 227

- H. Deleted by Amendment 227
- I. <u>Fire Protection</u>

The licensee shall implement and maintain in effect the provisions of the approved fire protection program as described in the Updated Final Safety Analysis Report and as approved in the SER dated September 19, 1979, (and Supplements dated May 29, 1980, October 9, 1980, December 18, 1980, February 13, 1981, December 4, 1981, April 27, 1982, November 18, 1982, January 17, 1984, February 25, 1988, and

Renewed License No. DPR-32 Amendment No. 251 E. Pursuant to the Act and 10 CFR Parts 30 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.

.3. This renewed license shall be deemed to contain and is subject to the conditions . specified in the following Commission regulations: 10 CFR Part 20, Section 30.34 of 10 CFR Part 30, Section 40.41 of 10 CFR Part 40, Sections 50.54 and 50.59 of 10 CFR Part 50, and Section 70.32 of 10 CFR Part 70; and is subject to all applicable provisions of the Act and the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified below:

A. Maximum Power Level

The licensee is authorized to operate the facility at steady state reactor core power levels not in excess of 2548 megawaits (ihermal).

B. <u>Technical Specifications</u>

The Technical Specifications contained in Appendix A, as revised through Amendment No. 250 are hereby incorporated in this renewed license. The licensee shall operate the facility in accordance with the Technical Specifications.

C, <u>Reports</u>

The licensee shall make certain reports in accordance with the requirements of the Technical Specifications.

D. <u>Records</u>

The licensee shall keep facility operating records in accordance with the requirements of the Technical Specifications.

- E. Deleted by Amendment 54
- F. Deleted by Amendment 59 and Amendment 65
- G. Deleted by Amendment 227
- H, Deleted by Amendment 227

Renewed License No. DPR-37 Amendment No. 250

# TECHNICAL SPECIFICATION TABLE OF CONTENTS

SECTION	N <u>TITLE</u>	PAGE
3.1	15 DELETED	
3.1	16 EMERGENCY POWER SYSTEM	TS 3.16-1
3.1	17 LOOP STOP VALVE OPERATION	TS 3.17-1
3.1	18 MOVABLE INCORE INSTRUMENTATION	TS 3.18-1
3.1	19 MAIN CONTROL ROOM BOTTLED AIR SYSTEM	TS 3.19-1
3.2	20 SHOCK SUPPRESSORS (SNUBBERS)	TS 3.20-1
3.2	21 DELETED	
3.2	22 AUXILIARY VENTILATION EXHAUST FILTER TRAINS	TS 3.22-1
3.2	23 CONTROL AND RELAY ROOM VENTILATION SUPPLY TRAINS	FILTER TS 3.23-1
4.0 <u>St</u>	0 SURVEILLANCE REQUIREMENTS	
4.	.1 OPERATIONAL SAFETY REVIEW	TS 4.1-1
4.	.2 AUGMENTED INSPECTIONS	TS 4.2-1
4.	.3 DELETED	
4.	.4 CONTAINMENT TESTS	TS 4.4-1
4.	.5 SPRAY SYSTEMS TESTS	TS 4.5-1
4.	.6 EMERGENCY POWER SYSTEM PERIODIC TESTING	TS 4.6-1
4.	.7 MAIN STEAM LINE TRIP VALVES	TS 4.7-1
4.	.8 AUXILIARY FEEDWATER SYSTEM	TS 4.8-1
4.	.9 RADIOACTIVE GAS STORAGE MONITORING SYSTEM	TS 4.9-1
4.	.10 REACTIVITY ANOMALIES	TS 4.10-1
4.	11 SAFETY INJECTION SYSTEM TESTS	TS 4.11-1
4.	1.12 VENTILATION FILTER TESTS	TS 4.12-1
4.	1.13 RCS OPERATIONAL LEAKAGE	TS 4.13-1
4.	1.14 DELETED	

Amendment Nos. 251, 250

TS ii

# TECHNICAL SPECIFICATION TABLE OF CONTENTS

SECTION		TITLE	PAGE
	4.15	AUGMENTED INSERVICE INSPECTION PROGRAM FOR HIGH ENERGY LINES OUTSIDE OF CONTAINMENT	TS 4.15-1
	4.16	LEAKAGE TESTING OF MISCELLANEOUS RADIOACTIVE MATERIALS SOURCES	TS 4.16-1
	4.17	SHOCK SUPPRESSORS (SNUBBERS)	TS 4.17-1
	4.18	DELETED	
	4.19	STEAM GENERATOR (SG) TUBE INTEGRITY	TS 4.19-1
	4.20	CONTROL ROOM AIR FILTRATION SYSTEM	TS 4.20-1
5.0	<u>DESI</u>	<u>GN FEATURES</u>	TS 5.1-1
	5.1	SITE	TS 5.1-1
	5.2	CONTAINMENT	TS 5.2-1
	5.3	REACTOR	TS 5.3-1
	5.4	FUEL STORAGE	TS 5.4-1
6.0	ADMINISTRATIVE CONTROLS		TS 6.1-1
	6.1	ORGANIZATION, SAFETY AND OPERATION REVIEW	TS 6.1-1
	6.2	GENERAL NOTIFICATION AND REPORTING REQUIREMENTS	TS 6.2-1
	6.3	ACTION TO BE TAKEN IF A SAFETY LIMIT IS EXCEEDED	TS 6.3-1
	6.4	UNIT OPERATING PROCEDURES AND PROGRAMS	TS 6.4-1
	6.5	STATION OPERATING RECORDS	TS 6.5-1
	6.6	STATION REPORTING REQUIREMENTS	TS 6.6-1
	6.7	ENVIRONMENTAL QUALIFICATIONS	TS 6.7-1
	6.8	PROCESS CONTROL PROGRAM AND OFFSITE DOSE CALCULATION MANUAL	TS 6.8-1

Amendment Nos. 251, 250

TS iii

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# W. STAGGERED TEST BASIS

A staggered test basis shall consist of:

- a. A test schedule for n systems, subsystems, trains or other designated components obtained by dividing the specified test interval into n equal subintervals, and
- b. The testing of one system, subsystem, train, or other designated component at the beginning of each subinterval.

# X. <u>LEAKAGE</u>

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
  - Reactor Coolant System (RCS) LEAKAGE through a steam generator to the Secondary System (primary to secondary LEAKAGE);
- b. Unidentified LEAKAGE

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

c. Pressure Boundary LEAKAGE

LEAKAGE (except primary to secondary LEAKAGE) through a nonisolable fault in an RCS component body, pipe wall, or vessel wall.

# C. <u>RCS Operational LEAKAGE</u>

# Applicability

The following specifications are applicable to RCS operational LEAKAGE whenever  $T_{avg}$  (average RCS temperature) exceeds 200°F (200 degrees Fahrenheit).

# **Specifications**

- 1. RCS operational LEAKAGE shall be limited to:
- a. No pressure boundary LEAKAGE,
- b. 1 gpm unidentified LEAKAGE,
- c. 10 gpm identified LEAKAGE, and
- d. 150 gallons per day primary to secondary LEAKAGE through any one steam generator (SG).
- 2.a. If RCS operational LEAKAGE is not within the limits of 3.1.C.1 for reasons other than pressure boundary LEAKAGE or primary to secondary LEAKAGE, reduce LEAKAGE to within the specified limits within 4 hours.
  - b. If the LEAKAGE is not reduced to within the specified limits within 4 hours, the unit shall be brought to HOT SHUTDOWN within the next 6 hours and COLD SHUTDOWN within the following 30 hours.
- If RCS pressure boundary LEAKAGE exists, or primary to secondary LEAKAGE is not within the limit specified in 3.1.C.1.d, the unit shall be brought to HOT SHUTDOWN within 6 hours and COLD SHUTDOWN within the following 30 hours.

- 4. Detected or suspected leakage from the Reactor Coolant System shall be investigated and evaluated. At least two means shall be available to detect reactor coolant system leakage. One of these means must depend on the detection of radionuclides in the containment.
- 5.a. Prior to going critical all primary coolant system pressure isolation valves listed below shall be functional as a pressure isolation device, except as specified in 3.1.C.5.b. Valve leakage shall not exceed the amounts indicated.

	<u>Unit 1</u>	Unit 2	Max. Allowable Leakage (see note (a) below)
Loop A, Cold Leg	1-SI-79, 1-SI-241	2-SI-79, 2-SI-241	≤ 5.0 gpm for each valve
Loop B, Cold Leg	1-SI-82, 1-SI-242	2-SI-82, 2-SI-242	
Loop C, Cold Leg	1-SI-85, 1-SI-243	2-SI-85, 2-SI-243	· ·

b. If Specification 3.1.C.5.a cannot be met, an orderly shutdown shall be initiated and the reactor shall be in HOT SHUTDOWN within 6 hours and in COLD SHUTDOWN within the following 30 hours.

#### Notes

- (a) 1. Leakage rates less than or equal to 1.0 gpm are considered acceptable.
  - 2. Leakage rates greater than 1.0 gpm but less than or equal to 5.0 gpm are considered acceptable if the latest measured rate has not exceeded the rate determined by the previous test by an amount that reduces the margin between measured leakage rate and the maximum permissible rate of 5.0 gpm by 50% or greater.
  - 3. Leakage rates greater than 1.0 gpm but less than or equal to 5.0 gpm are considered unacceptable if the latest measured rate exceeded the rate determined by the previous test by an amount that reduces the margin between measured leakage rate and the maximum permissible rate of 5.0 gpm by 50% or greater.
  - 4. Leakage rates greater than 5.0 gpm are considered unacceptable.

# **BASES**

<u>BACKGROUND</u> - Components that contain or transport the coolant to or from the reactor core make up the RCS. Component joints are made by welding, bolting, rolling, or pressure loading, and valves isolate connecting systems from the RCS.

During unit life, the joint and valve interfaces can produce varying amounts of reactor coolant LEAKAGE, through either normal operational wear or mechanical deterioration. The purpose of the RCS Operational LEAKAGE limiting condition for operation (LCO) is to limit system operation in the presence of LEAKAGE from these sources to amounts that do not compromise safety. This LCO specifies the types and amounts of LEAKAGE.

The safety significance of RCS LEAKAGE varies widely depending on its source, rate, and duration. Therefore, detecting and monitoring reactor coolant LEAKAGE into the containment area is necessary. Quickly separating the identified LEAKAGE from the unidentified LEAKAGE is necessary to provide quantitative information to the operators, allowing them to take corrective action should a leak occur that is detrimental to the safety of the facility and the public.

Leakage from the RCS is collected in the containment or by other systems. These systems are the Main Steam System, Condensate and Feedwater System, the Gaseous and Liquid Waste Disposal Systems, the Component Cooling System, and the Chemical and Volume Control System.

Detection of leaks from the RCS is by one or more of the following:

- 1. An increased amount of makeup water required to maintain normal level in the pressurizer.
- 2. A high temperature alarm in the leakoff piping provided to collect reactor head flange leakage.
- 3. Containment sump water level indication.
- 4. Containment pressure, temperature, and humidity indication.

If there is significant radioactive contamination of the reactor coolant, the radiation monitoring system provides a sensitive indication of primary system leakage. Radiation monitors which indicate primary system leakage include the containment gas and particulate monitors, the condenser air ejector monitor, the component cooling water monitor, and the steam generator blowdown monitor.

A limited amount of leakage inside containment is expected from auxiliary systems that cannot be made 100% leaktight. Leakage from these systems should be detected, located, and isolated from the containment atmosphere, if possible, to not interfere with RCS leakage detection.

This LCO deals with protection of the reactor coolant pressure boundary (RCPB) from degradation and the core from inadequate cooling, in addition to preventing the accident analyses radiation release assumptions from being exceeded. The consequences of violating this LCO include the possibility of a loss of coolant accident (LOCA).

<u>APPLICABLE SAFETY ANALYSES</u> - 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 1 gpm or increases to 1 gpm 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. 2) 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 total primary to secondary LEAKAGE, including 500 gpd leakage into the faulted generator. The dose consequences resulting from the MSLB and the SGTR accidents are within the limits defined in the plant licensing basis.

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

LIMITING CONDITIONS FOR OPERATION - 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. 3). 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.

<u>APPLICABILITY</u> - In REACTOR OPERATION conditions where  $T_{avg}$  exceeds 200°F, the potential for RCPB LEAKAGE is greatest when the RCS is pressurized.

In COLD SHUTDOWN and REFUELING SHUTDOWN, LEAKAGE limits are not required because the reactor coolant pressure is far lower, resulting in lower stresses and reduced potentials for LEAKAGE.

LCO 3.1.C.5 measures leakage through each individual pressure isolation valve (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 leaktight. 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**

## <u>3.1.C.2.a</u>

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.

# 3.1.C.2.b and 3.1.C.3

If any pressure boundary LEAKAGE exists, or primary to secondary LEAKAGE is not within limit, or if unidentified or identified LEAKAGE cannot be reduced to within limits within 4 hours, the reactor must be brought to lower pressure conditions to reduce the severity of the LEAKAGE and its potential consequences. It should be noted that LEAKAGE past seals and gaskets is not pressure boundary LEAKAGE. The reactor must be brought to HOT SHUTDOWN within 6 hours and COLD SHUTDOWN within the following 30 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 COLD SHUTDOWN, the pressure stresses acting on the RCPB are much lower, and further deterioration is much less likely.

## REFERENCES

- 1. UFSAR, Chapter 4, Surry Units 1 and 2.
- 2. UFSAR, Chapter 14, Surry Units 1 and 2.
- 3. NEI 97-06, "Steam Generator Program Guidelines."
- 4. EPRI, "Pressurized Water Reactor Primary-to-Secondary Leak Guidelines."

# D. Maximum Reactor Coolant Activity

# Specifications

- 1. The total specific activity of the reactor coolant due to nuclides with half-lives of more than 15 minutes shall not exceed  $100/\bar{E} \ \mu Ci/cc$  whenever the reactor is critical or the average temperature is greater than 500°F, where  $\bar{E}$  is the average sum of the beta and gamma energies, in Mev, per disintegration. If this limit is not satisfied, the reactor shall be shut down and cooled to 500°F or less within 6 hours after detection. Should this limit be exceeded by 25%, the reactor shall be made subcritical and cooled to 500°F or less within 2 hours after detection.
- 2. The specific activity of the reactor coolant shall be limited to  $\leq 1.0 \,\mu$ Ci/cc DOSE EQUIVALENT I-131 whenever the reactor is critical or the average temperature is greater than 500°F.
- 3. The requirements of D-2 above may be modified to allow the specific activity of the reactor coolant > 1.0  $\mu$ Ci/cc DOSE EQUIVALENT I-131 but less than 10.0  $\mu$ Ci/cc DOSE EQUIVALENT I-131. Following shutdown, the unit may be restarted and/or operation may continue for up to 48 hours provided that operation under these circumstances shall not exceed 10 percent of the unit's total yearly operating time. With the specific activity of the reactor coolant > 1.0  $\mu$ Ci/cc DOSE EQUIVALENT I-131 for more than 48 hours during one continuous time interval or exceeding 10.0  $\mu$ Ci/cc DOSE EQUIVALENT I-131, the reactor shall be shut down and cooled to 500°F or less within 6 hours after detection.
- 4. If the specific activity of the reactor coolant exceeds  $1.0 \,\mu\text{Ci/cc}$  DOSE EQUIVALENT I-131 or  $100/\overline{E} \,\mu\text{Ci/cc}$ , a report shall be prepared and submitted to the Commission pursuant to Specification 6.6.A.2. This report shall contain the results of the specific activity analysis together with the following information:
  - a. Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded,
  - b. Clean-up system flow history starting 48 hours prior to the first sample in which the limit was exceeded,

# H. Steam Generator (SG) Tube Integrity

# Applicability

The following specifications are applicable whenever  $T_{avg}$  (average RCS temperature) exceeds 200°F (200 degrees Fahrenheit).

# Specifications

- 1. 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.
- 2. If the requirements of 3.1.H.1 are not met for one or more SG tubes, then perform the following:<sup>1</sup>
- a. Within 7 days, verify tube integrity of the affected tube(s) is maintained until the next refueling outage or SG tube inspection; and
- b. Plug the affected tube(s) in accordance with the Steam Generator Program prior to T<sub>avg</sub> exceeding 200°F following the next refueling outage or SG tube inspection.
- 3. If the required actions of Specification 3.1.H.2 are not completed within the specified completion time, or SG tube integrity is not maintained, the unit shall be brought to HOT SHUTDOWN within the next 6 hours and COLD SHUTDOWN within the following 30 hours.

#### Note:

1. A separate TS action entry is allowed for each SG tube.

# <u>BASES</u>

<u>BACKGROUND</u> - 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. Steam generator 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 3.1.A.2.

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.

Steam generator tubing is subject to a variety of degradation mechanisms. Steam generator 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 6.4.Q, "Steam Generator (SG) Program," requires that a program be established and implemented to ensure that SG tube integrity is maintained. Pursuant to Specification 6.4.Q, 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 6.4.Q. Meeting the 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).

<u>APPLICABLE SAFETY ANALYSES</u> - The steam generator tube rupture (SGTR) accident is the limiting design basis event for SG tubes and avoiding an SGTR is the basis for this Specification. The analysis of an 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 Specification 3.1.C, "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 analyses 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 within Specification 3.1.D, "Maximum Reactor Coolant 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 Regulatory Guide 1.183 (Ref. 4), as appropriate.

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

<u>LIMITING CONDITIONS FOR OPERATION</u> - The LCO requires that SG tube integrity be maintained. The LCO also requires that all SG tubes that satisfy the repair criteria be plugged in accordance with the Steam Generator Program.

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

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

A SG tube has tube integrity when it satisfies the SG performance criteria. The SG performance criteria are defined in Specification 6.4.Q, "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 significantly affect burst or collapse. In that context, the term "significantly" is defined as "An accident loading condition other than differential pressure is considered significant when the addition of such loads in the assessment of the structural integrity performance criterion could cause a lower structural limit or limiting burst/collapse condition to be established." 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 Specification 3.1.C, "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.

<u>APPLICABILITY</u> - Steam generator tube integrity is challenged when the pressure differential across the tubes is large. Large differential pressures across SG tubes can only be experienced when  $T_{avg}$  exceeds 200°F.

RCS conditions are far less challenging in COLD SHUTDOWN and REFUELING SHUTDOWN than during INTERMEDIATE SHUTDOWN, HOT SHUTDOWN, REACTOR CRITICAL and POWER OPERATION. In COLD SHUTDOWN and REFUELING SHUTDOWN, primary to secondary differential pressure is low, resulting in lower stresses and reduced potential for LEAKAGE.

<u>ACTIONS</u> - The actions are modified by a Note clarifying that the conditions may be entered independently 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.

# <u>3.1.H.2.a and b</u>

Specification 3.1.H.2 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 4.19. 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, Specification 3.1.H.3 applies.

A completion time of 7 days is sufficient to complete the evaluation while minimizing the risk of unit 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 3.1.H.2.b allows unit operation to continue until the next refueling outage or SG inspection provided the inspection interval continues to be supported by an operational assessment that reflects the affected tubes. However, the affected tube(s) must be plugged prior to  $T_{avg}$  exceeding 200°F 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.

## <u>3.1.H.3</u>

If the required actions and associated completion times of Specification 3.1.H.2 are not met or if SG tube integrity is not being maintained, the reactor must be brought to HOT SHUTDOWN within 6 hours and COLD SHUTDOWN within the following 30 hours.

The allowed completion times are reasonable, based on operating experience, to reach the desired unit conditions from full power conditions in an orderly manner and without challenging plant systems.

# REFERENCES

- 1. NEI 97-06, "Steam Generator Program Guidelines."
- 2. 10 CFR 50 Appendix A, GDC 19.
- 3. 10 CFR 50.67.
- 4. Regulatory Guide 1.183, "Alternative Radiological Source Terms for Evaluating Design Basis Accidents at Nuclear Power Reactors," 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."

	<u>M</u>	INIMUM FREQUENCY FOR E	QUIPMENT TESTS	
	DESCRIPTION	TEST	FREQUENCY	FSAR SECTION <u>REFERENCE</u>
1.	Control Rod Assemblies	Rod drop times of all full length rods at hot conditions	<ul> <li>Prior to reactor criticality:</li> <li>a. For all rods following each removal of the reactor vessel head</li> <li>b. For specially affected individual rods following any maintenance on or modification to the control rod drive system which could affect the drop time of those specific rods, and</li> <li>c. Once per 18 months</li> </ul>	7
2.	Control Rod Assemblies	Partial movement of all rods	Quarterly	7
3.	Refueling Water Chemical Addition Tank	Functional	Once per 18 months	6
4.	Pressurizer Safety Valves	Setpoint	Per the Inservice Testing Program	4
5.	Main Steam Safety Valves	Setpoint	Per the Inservice Testing Program	10
6.	Containment Isolation Trip	* Functional	Once per 18 months	5
7.	Refueling System Interlocks	* Functional	Prior to refueling	9.12
8.	Service Water System	* Functional	Once per 18 months	9.9
9.	Deleted			
10.	Deleted			
11.	Diesel Fuel Supply	* Fuel Inventory	5 days/week	8.5
12.	Deleted			
13.	Main Steam Line Trip Valves	Functional (Full Closure)	Before each startup (TS 4.7) The provisions of Specification 4.0.4. are not applicable	10

# TABLE 4.1-2A AINIMUM FREQUENCY FOR EQUIPMENT TESTS

TS 4.1-9b

# TABLE 4.1-2A(CONTINUED)MINIMUM FREQUENCY FOR EQUIPMENT TESTS

FREOUENCY

Once per 18 months

# DESCRIPTION 19. Primary Coolant

9. Primary Coolant System Functional

Functional

TEST

## Periodic leakage testing(a)(b) on each valve listed in Specification 3.1.C.5.a shall be accomplished prior to entering POWER OPERATION after every time the plant is placed in COLD SHUTDOWN for refueling, after each time the plant is placed in COLD SHUTDOWN for 72 hours if testing has not been accomplished in the preceding 9 months, and prior to returning the valve to service after maintenance, repair or replacement work is performed.

Semi-Annual (Unit at power or shutdown) if purge valves are operated during interval(c)

20. Containment Purge MOV Leakage

21. Deleted

22. RCS Flow Flow  $\geq 273,000$  gpm

23. Deleted

(a) To satisfy ALARA requirements, leakage may be measured indirectly (as from the performance of pressure indicators) if accomplished in accordance with approved procedures and supported by computations showing that the method is capable of demonstrating valve compliance with the leakage criteria.

(b) Minimum differential test pressure shall not be below 150 psid.

(c) Refer to Section 4.4 for acceptance criteria.

See Specification 4.1.D.

UFSAR SECTION

REFERENCE

14

# 4.13 RCS OPERATIONAL LEAKAGE

## Applicability

The following specifications are applicable to RCS operational LEAKAGE whenever  $T_{avg}$  (average RCS temperature) exceeds 200°F (200 degrees Fahrenheit).

# Objective

To verify that RCS operational LEAKAGE is maintained within the allowable limits.

# Specifications

- A. Verify RCS operational LEAKAGE is within the limits specified in TS 3.1.C by performance of RCS water inventory balance once every 24 hours.<sup>1, 2</sup>
- B. Verify primary to secondary LEAKAGE is ≤ 150 gallons per day through any one SG once every 72 hours.<sup>1</sup>

# Notes:

- 1. Not required to be completed until 12 hours after establishment of steady state operation.
- 2. Not applicable to primary to secondary LEAKAGE.

# BASES

## SURVEILLANCE REQUIREMENTS (SR)

# SR 4.13.A

Verifying RCS LEAKAGE to be within the Limiting Condition for Operation (LCO) limits ensures the integrity of the reactor coolant pressure boundary (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 performed with the reactor at steady state operating conditions (stable pressure, 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 completed until 12 hours after establishing steady state operation. The 12 hour allowance provides sufficient time to collect and process all necessary data after stable unit 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 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 the TS 3.1.C Bases.

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

# <u>SR 4.13.B</u>

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 3.1.H, "Steam Generator Tube Integrity," should be evaluated. The 150 gallons per day limit is measured at room temperature as described in Reference 4. 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. 4).

## REFERENCES

- 1. UFSAR, Chapter 4, Surry Units 1 and 2.
- 2. UFSAR, Chapter 14, Surry Units 1 and 2.
- 3. NEI 97-06, "Steam Generator Program Guidelines."
- 4. EPRI, "Pressurized Water Reactor Primary-to-Secondary Leak Guidelines."

# 4.19 STEAM GENERATOR (SG) TUBE INTEGRITY

## Applicability

Applies to the verification of SG tube integrity in accordance with the Steam Generator Program.

## **Objective**

To provide assurance of SG tube integrity.

## Specifications

- A. Verify SG tube integrity in accordance with the Steam Generator Program.
- B. Verify that each inspected SG tube that satisfies the tube repair criteria is plugged in accordance with the Steam Generator Program prior to T<sub>avg</sub> exceeding 200°F following a SG tube inspection.

## **BASES**

#### SURVEILLANCE REQUIREMENTS (SR)

# <u>SR 4.19.A</u>

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

The Steam Generator Program defines the frequency of SR 4.19.A. 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 6.4.Q contains prescriptive requirements concerning inspection intervals to provide added assurance that the SG performance criteria will be met between scheduled inspections.

# <u>SR 4.19.B</u>

During an SG inspection, any inspected tube that satisfies the Steam Generator Program repair criteria is removed from service by plugging. The tube repair criteria delineated in Specification 6.4.Q 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 and Reference 7 provide 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  $T_{avg}$  exceeding 200°F 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.
- 4. Regulatory Guide 1.183, "Alternative Radiological Source Terms for Evaluating Design Basis Accidents at Nuclear Power Reactors," 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."

# Q. 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:

- 1. Provisions for condition monitoring assessments. Condition monitoring assessment means an evaluation of the "as found" condition of the tubing with respect to the performance criteria for structural integrity and accident induced leakage. The "as found" condition refers to the condition of the tubing during an SG inspection outage, as determined from the inservice inspection results or by other means, prior to the plugging of tubes. Condition monitoring assessments shall be conducted during each outage during which the SG tubes are inspected or plugged to confirm that the performance criteria are being met.
- 2. 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.
  - a. 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.
  - b. 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 SG.

- c. The operational LEAKAGE performance criterion is specified in TS 3.1.C and 4.13, "RCS Operational LEAKAGE."
- 3. 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.
- 4. 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 4.a, 4.b, and 4.c 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.
  - a. Inspect 100% of the tubes in each SG during the first refueling outage following SG replacement.
  - b. Inspect 100% of the tubes at sequential periods of 120, 90, and, thereafter, 60 effective full power months. The first sequential period shall be considered to begin after the first inservice inspection of the SGs. In addition, inspect 50% of the tubes by the refueling outage nearest the midpoint of the period and the remaining 50% by the refueling outage nearest the end of the period. No SG shall operate for more than 48 effective full power months or two refueling outages (whichever is less) without being inspected.
  - c. 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. Provisions for monitoring operational primary to secondary LEAKAGE.

- b. The results of specific activity analysis in which the primary coolant exceeded the limits of Specification 3.1.D.4. In addition, the information itemized in Specification 3.1.D.4 shall be included in this report.
- 3. Steam Generator Tube Inspection Report

A report shall be submitted within 180 days after  $T_{avg}$  exceeds 200°F following completion of an inspection performed in accordance with the Specification 6.4.Q, 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.