FPL Energy
Seabrook Station

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Docket No. 50-443
SBK-L-07193

U. S. Nuclear Regulatory Commission
Attn.: Document Control Desk
Washington, DC 20555-0001

Seabrook Station
Submittal of Changes to the Seabrook Station Technical Specification Bases

FPL Energy Seabrook, LLC submits the enclosed changes to the Seabrook Station Technical Specification Bases. The changes were made in accordance with Technical Specification 6.7.6.j., "Technical Specification (TS) Bases Control Program." Please update the Technical Specification Bases in accordance with Enclosure 1.

Should you have any questions concerning this matter, please contact James M. Peschel, Regulatory Programs Manager, at (603) 773-7194.

Very truly yours,

FPL Energy Seabrook, LLC

Gene St. Pierre
Site Vice President

cc: S. J. Collins, NRC Region I Administrator
E. Miller, NRC Project Manager, Project Directorate I-2
W. J. Raymond, NRC Senior Resident Inspector

A001
NRR

Enclosure 1 to SBK-L-07193

Change Instructions for
Seabrook Station Technical Specification Bases

(Sheet 1 of 2)

REMOVE	INSERT
3.0/4.0 Bases Index pages i through iii	3.0/4.0 Bases Index pages i through iii
Pages B 3/4 0-3	Page B 3/4 0-3
Pages B 3/4 0-3a, B 3/4 0-3b and B 3/4 0-3c	Pages B 3/4 0-3a, B 3/4 0-3b and B 3/4 0-3c
Pages B 3/4 0-7 and B 3/4 0-8	Pages B 3/4 0-7 and B 3/4 0-8
Page B 3/4 4-1	Page B 3/4 4-1
Page B 3/4 4-1a	-----------------
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Pages B 3/4 4-3 and B 3/4 4-4	Pages B 3/4 4-3 and B 3/4 4-4
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Pages B 3/4 7-5 and B 3/4 7-6	Pages B 3/4 7-5 and B 3/4 7-6

Change Instructions for
Seabrook Station Technical Specification Bases

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Page B 3/4 7-6a	Page B 3/4 7-6a
Page B 3/4 7-11	Page B 3/4 7-11
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Enclosure 2 to SBK-L-07193

3.0/4.0 BASES

BASES

BASES

SECTION PAGE

Therefore, if remedial measures are completed that would permit a return to POWER operation, a penalty is not incurred by having to reach a lower MODE of operation in less than the total time allowed.

The same principle applies with regard to the allowable outage time limits of the ACTION requirements, if compliance with the ACTION requirements for one specification results in entry into a MODE or condition of operation for another specification in which the requirements of the Limiting Condition for Operation are not met. If the new specification becomes applicable in less time than specified, the difference may be added to the allowable outage time limits of the second specification. However, the allowable outage time limits of ACTION requirements for a higher MODE of operation may not be used to extend the allowable outage time that is applicable when a Limiting Condition for Operation is not met in a lower MODE of operation.

The shutdown requirements of Specification 3.0.3 do not apply in MODES 5 and 6, because the ACTION requirements of individual specifications define the remedial measures to be taken.

Limiting Condition for Operation (LCO) 3.0.4 establishes limitations on changes in MODES or other specified conditions in the Applicability when an LCO is not met. It allows placing the unit in a MODE or other specified condition stated in that Applicability (e.g., the Applicability desired to be entered) when unit conditions are such that the requirements of the LCO would not be met, in accordance with LCO 3.0.4.a, LCO 3.0.4.b, or LCO 3.0.4.c.

LCO 3.0.4.a allows entry into a MODE or other specified condition in the Applicability with the LCO not met when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time. Compliance with required ACTIONS that permit continued operation of the unit for an unlimited period of time in a MODE or other specified condition provides an acceptable level of safety for continued operation. This is without regard to the status of the unit before or after the MODE change. Therefore, in such cases, entry into a MODE or other specified condition in the Applicability may be made in accordance with the provisions of the Required Actions.

LCO 3.0.4.b allows entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate.

The risk assessment may use quantitative, qualitative, or blended approaches, and the risk assessment will be conducted using the plant program, procedures, and criteria in place to implement 10 CFR 50.65(a)(4), which requires that risk impacts of maintenance activities to be assessed and managed. The risk assessment, for the purposes of LCO 3.0.4 (b), must take into account all inoperable Technical Specification equipment regardless of whether the equipment is included in the normal 10 CFR 50.65(a)(4) risk assessment scope. The risk assessments will be conducted using the procedures and guidance endorsed by Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." Regulatory Guide 1.182 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." These documents address general guidance for conduct of the risk assessment, quantitative and qualitative guidelines for establishing risk management actions, and example risk management actions. These include actions to plan and conduct other activities in a manner that controls overall risk, increased risk awareness by shift and management personnel, actions to reduce the duration of the condition, actions to minimize the magnitude of risk increases (establishment of backup success paths or compensatory measures), and determination that the proposed MODE change is acceptable. Consideration should also be given to the probability of completing restoration such that the requirements of the LCO would be met prior to the expiration of ACTIONS completion times that would require exiting the Applicability.

LCO 3.0.4.b may be used with single, or multiple systems and components unavailable. NUMARC 93-01 provides guidance relative to consideration of simultaneous unavailability of multiple systems and components.

The results of the risk assessment shall be considered in determining the acceptability of entering the MODE or other specified condition in the Applicability, and any corresponding risk management actions. The LCO 3.0.4.b risk assessments do not have to be documented.

The Technical Specifications allow continued operation with equipment unavailable in MODE 1 for the duration of the ACTION completion time. Since this is allowable, and since in general the risk impact in that particular MODE bounds the risk of transitioning into and through the applicable MODES or other specified conditions in the Applicability of the LCO, the use of the LCO 3.0.4.b allowance should be generally acceptable, as long as the risk is assessed and managed as stated above. However, there is a small subset of systems and components that have been determined to be more important to risk and use of the LCO 3.0.4.b allowance is prohibited. The LCOs governing these systems and components contain Notes prohibiting the use of LCO 3.0.4.b by stating that LCO 3.0.4.b is not applicable.

LCO 3.0.4.c allows entry into a MODE or other specified condition in the Applicability with the LCO not met based on a Note in the Specification which states LCO 3.0.4.c is applicable. These specific allowances permit entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered do not provide for continued operation for an unlimited period of time and a risk assessment has not been performed. This allowance may apply to all the ACTIONS or to a specific ACTION of a Specification. The risk assessments performed to justify the use of LCO 3.0.4.b usually only consider systems and components. For this reason, LCO 3.0.4.c is typically applied to Specifications which describe values and parameters (e.g., Reactor Coolant System Specific Activity), and may be applied to other Specifications based on NRC plant-specific approval.

The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

The provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown. In this context, a unit shutdown is defined as a change in MODE or other specified condition in the Applicability associated with transitioning from MODE 1 to MODE 2, MODE 2 to MODE 3, MODE 3 to MODE 4, and MODE 4 to MODE 5.

Upon entry into a MODE or other specified condition in the Applicability with the LCO not met, LCO 3.0.1 and LCO 3.0.2 require entry into the applicable ACTIONS until the condition is resolved, until the LCO is met, or until the unit is not within the Applicability of the Technical Specification.

Surveillances do not have to be performed on the associated inoperable equipment (or on variables outside the specified limits), as permitted by Surveillance Requirement (SR) 4.0.1. Therefore, utilizing LCO 3.0.4, is not a violation of SR 4.0.1 or SR 4.0.4 for any Surveillances that have not been performed on inoperable equipment. However, Surveillance Requirements must be met to ensure OPERABILITY prior to declaring the associated equipment OPERABLE (or variable within limits) and restoring compliance with the affected LCO.

When a shutdown is required to comply with ACTION requirements, the provisions of Specification 3.0.4 do not apply because they would delay placing the facility in a lower MODE of operation.

Specification 3.0.5 establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS. The sole purpose of this Specification is to provide an exception to Specifications 3.0.1 and 3.0.2 (e.g., to not comply with the applicable Required Action(s)) to allow the performance of required testing to demonstrate:

a. The OPERABILITY of the equipment being returned to service; or

b. The OPERABILITY of other equipment.

The administrative controls ensure the time the equipment is returned to service in conflict with the requirements of the ACTIONS is limited to the time absolutely necessary to perform the allowed required testing. This Specification does not provide time to perform any other preventive or corrective maintenance.

An example of demonstrating the OPERABILITY of the equipment being returned to service is reopening a containment isolation valve that has been closed to comply with Required Actions and must be reopened to perform the required testing.

An example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of required testing on another channel in the other trip system. A similar example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to permit the logic to function and indicate the appropriate response during the performance of required testing on another channel in the same trip system.

Specifications 4.0.1 through 4.0.5 establish the general requirements applicable to Surveillance Requirements. These requirements are based on the Surveillance Requirements stated in the Code of Federal Regulations, 10 CFR 50.36(c)(3):

"Surveillance requirements are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions of operation will be met."

Surveillance Requirement (SR) 4.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified condition in the Applicability.

This Specification ensures that system and component OPERABILITY requirements and variable limits are met before entry into MODES or other specified conditions in the Applicability for which these systems and components ensure safe operation of the unit. The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

A provision is included to allow entry into a MODE or other specified condition in the Applicability when a Limiting Condition for Operations (LCO) is not met due to Surveillances not being met in accordance with LCO 3.0.4.

However, in certain circumstances, failing to meet a SR will not result in SR 4.0.4 restricting a MODE change or other specified condition change. When a system, subsystem, train, component, device, or variable is inoperable or outside its specified limits, the associated SR(s) are not required to be performed, per SR 4.0.1, which states that surveillances do not have to be performed on inoperable equipment. When equipment is inoperable, SR 4.0.4 does not apply to the associated SR(s) since the requirement for the SR(s) to be performed is removed. Therefore, failing to perform the Surveillance(s) within the specified Frequency does not result in a SR 4.0.4 restriction to changing MODES or other specified conditions of the Applicability. However, since the LCO is not met in this instance, LCO 3.0.4 will govern any restrictions that may (or may not) apply to MODE or other specified condition changes. SR 4.0.4 does not restrict changing MODES or other specified conditions of the Applicability when a Surveillance has not been performed within the specified Frequency, provided the requirement to declare the LCO not met has been delayed in accordance with SR 4.0.3.

The provisions of SR 4.0.4 shall not prevent entry into MODES or other specified conditions in the Applicability that is required to comply with ACTIONS. In addition, the provisions of SR 4.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown. In this context, a unit shutdown is defined as a change in MODE or other specified condition in the Applicability associated with transitioning from MODE 1 to MODE 2, MODE 2 to MODE 3, MODE 3 to MODE 4, and MODE 4 to MODE 5.

Certain Specifications allow an exception to the requirements of SR 4.0.4 for individual Surveillance Requirements when the surveillance can only be performed after entering the MODE or condition specified in the Applicability statement. When surveillance requirements become applicable as a consequence of an exception to SR 4.0.4, a period of 24 hours, unless otherwise stipulated in the individual technical specification, is permitted to allow completion of surveillance testing. During this period, the equipment is considered OPERABLE or the variable within specified limits provided all other necessary surveillance testing has been completed satisfactorily and the equipment or variable is not otherwise known to be inoperable or outside specified limits. Considering the equipment OPERABLE or the variable within specified limits upon entering the MODE or condition specified in the Applicability statement with a surveillance requirement exempt from the provision of SR 4.0.4 ensures compliance with LCO 3.0.4. If the surveillance fails within the 24-hour period, then the equipment is inoperable or the variable is outside the specified limits and the applicable ACTIONS begin immediately upon the failure of the surveillance test. Similarly, if the testing is not completed within 24 hours, the equipment is inoperable or the variable is outside specified limits and the ACTION requirements are immediately applicable upon expiration of the 24 hours.

Specification 4.0.5 establishes the requirement that inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and the ASME OM Code including applicable Addenda as required by 10 CFR 50.55a. These requirements apply except when relief has been provided in writing by the Commission.

This specification includes a clarification of the frequencies for performing the inservice inspection and testing activities required by Section XI of the ASME Boiler and Pressure Vessel Code and the ASME OM Code including applicable Addenda. This clarification is provided to ensure consistency in surveillance intervals throughout the Technical Specifications and to remove any ambiguities relative to the frequencies for performing the required inservice inspection and testing activities.

Under the terms of this specification, the more restrictive requirements of the Technical Specifications take precedence over the ASME Boiler and Pressure Vessel Code and the ASME OM Code including applicable Addenda. The requirements of Specification 4.0.4 to perform surveillance activities before entry into an OPERATIONAL MODE or other specified condition takes precedence over the ASME OM Code provision which allows pumps that can only be tested during plant operation to be tested within 1 week following plant startup.

3/4.4.1 REACTOR COOLANT LOOPS AND COOLANT CIRCULATION

An OPERABLE reactor coolant system loop consists of an OPERABLE reactor coolant pump and an OPERABLE steam generator.

The plant is designed to operate with all reactor coolant loops in operation and maintain DNBR above 1.30 during all normal operations and anticipated transients. In MODES 1 and 2 with one reactor coolant loop not in operation, this specification requires that the plant be in at least HOT STANDBY within 6 hours.

In MODE 3, two reactor coolant loops provide sufficient heat removal capability for removing core decay heat even in the event of a bank withdrawal accident; however, a single reactor coolant loop provides sufficient heat removal capacity if a bank withdrawal accident can be prevented, i.e., by placing the Control Rod Drive System in a condition incapable of rod withdrawal. Single failure considerations require that two loops be OPERABLE at all times.

In MODE 4, and in MODE 5 with reactor coolant loops filled, a single reactor coolant loop or RHR loop provides sufficient heat removal capability for removing decay heat; but single failure considerations require that at least two loops (either RHR or RCS) be OPERABLE.

In MODE 5 with reactor coolant loops not filled, a single RHR loop provides sufficient heat removal capability for removing decay heat; but single failure considerations, and the unavailability of the steam generators as a heat removing component, require that at least two RHR loops be OPERABLE.

A Reactor Coolant "loops filled" condition is defined as follows: (1) Having pressurizer level greater than or equal to 55% if the pressurizer does not have a bubble, and greater than or equal to 17% when there is a bubble in the pressurizer. (2) Having the air and non-condensables evacuated from the Reactor Coolant System by either operating each reactor coolant pump for a short duration to sweep air from the Steam Generator U-tubes into the upper head area of the reactor vessel, or removing the air from the Reactor Coolant System via an RCS evacuation skid, and (3) Having vented the upper head area of the reactor vessel if the pressurizer does not have a bubble. (4) Having the Reactor Coolant System not vented, or if vented capable of isolating the vent paths within the time to boil.

The operation of one reactor coolant pump (RCP) or one RHR pump provides adequate flow to ensure mixing, prevent stratification and produce gradual reactivity changes during boron concentration reductions in the Reactor Coolant System. The reactivity change rate associated with boron reduction will, therefore, be within the capability of operator recognition and control.

The restrictions on starting an RCP in MODES 4 and 5 are provided to prevent RCS pressure transients, caused by energy additions from the Secondary Coolant System, which could exceed the limits of Appendix G to 10 CFR Part 50. The RCS will be protected against overpressure transients and will not exceed the limits of Appendix G by restricting starting of the RCPs to when the secondary water temperature of each steam generator is less than 50°F above each of the RCS cold-leg temperatures.

3/4.4.2 SAFETY VALVES

The pressurizer Code safety valves operate to prevent the RCS from being pressurized above its Safety Limit of 2735 psig. Each safety valve is designed to relieve 420,000 lbs per hour of saturated steam at the valve Setpoint. The relief capacity of a single safety valve is adequate to relieve any overpressure condition which could occur during shutdown.

In the event that no safety valves are OPERABLE in MODE 4 or 5, the action statement requires immediately suspending positive reactivity changes and placing an RHR loop in operation in the shutdown cooling mode. An operating RHR loop, connected to the RCS, provides overpressure relief capability and will prevent RCS overpressurization. In addition, the Overpressure Protection System provides a diverse means of protection against RCS overpressurization at low temperatures. Operations that individually add limited, positive reactivity are acceptable when, combined with other actions that add negative reactivity, the overall net reactivity addition is zero or negative. For example, a positive reactivity addition caused by temperature fluctuations from inventory addition or temperature control fluctuations is acceptable if it is combined with a negative reactivity addition such that the overall, net reactivity addition is zero or negative.

During plant operations in Mode 5, it is conservative and consistent with Technical Specifications that the OPERABLE pressurizer safety valve may be removed from its flange and continue to meet the intent of this Specification. The removal of the pressurizer safety valve will afford the reactor coolant system equivalent or superior protection as an overpressure device. This will also allow the removal of the three pressurizer safety valves to be used as a gravity vent path in place of removing the pressurizer manway when the plant is at reduced inventory conditions.

During operation, all pressurizer Code safety valves must be OPERABLE to prevent the RCS from being pressurized above its Safety Limit of 2735 psig. The combined relief capacity of all of these valves is greater than the maximum surge rate resulting from a complete loss of load assuming no Reactor trip until the first Reactor Trip System Trip Setpoint is reached (i.e., no credit is taken for a direct Reactor trip on the loss of load) and also assuming no operation of the power-operated relief valves or steam dump valves.

Demonstration of the safety valves' lift settings will be performed when removed from the reactor coolant system in accordance with the provisions of the ASME Code for Operation and Maintenance of Nuclear Power Plants.

3/4.4.3 PRESSURIZER

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

3/4.4.4 RELIEF VALVES

The power-operated relief valves (PORVs) and steam bubble function to relieve RCS pressure during all design transients up to and including the design step load decrease with steam dump. Operation of the PORVs minimizes the undesirable opening of the spring-loaded pressurizer Code safety valves. Each PORV has a remotely operated block valve to provide a positive shutoff capability should a relief valve become inoperable. The PORVs and their associated block valves are powered from Class 1E power supply busses.

The PORVs are equipped with automatic actuation circuitry and manual control capability. The PORVs are considered OPERABLE in either the automatic or manual mode for the following reasons:

(1) No credit is taken in any FSAR accident analysis for automatic PORV actuation to mitigate the consequences of an accident.

(2) No Surveillance Requirement (ACOT or TADOT) exists for verifying automatic operation.

(3) The required ACTION for an inoperable PORV(s) (closing the block valve) conflicts with any presumed requirement for automatic actuation.

3/4.4.5 STEAM GENERATORS (SG) TUBE INTEGRITY

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. 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.

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 6.7.6.k, "Steam Generator (SG) Program," requires that a program be established and implemented to ensure that SG tube integrity is maintained. Pursuant to Specification 6.7.6.k, 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 6.7.6.k. 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).

APPLICABLE SAFETY ANALYSIS

The steam generator tube rupture (SGTR) accident is the limiting design basis event for SG tubes and avoiding a SGTR is the basis for this Specification. In the analysis of a SGTR, the primary-to-secondary leak rate is apportioned between the SGs (1.0 gpm total, 500 gpd to any one SG). The tube leakage is conservatively apportioned as 313.33 gpd to the faulted SG and 1126.67 gpd total to the other three SGs in order to maximize dose consequences. The analysis assumes the leakage rate associated with the instantaneous

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

rupture of a SG tube that relieves to the lower pressure secondary system. The analysis assumes that contaminated fluid is released to the atmosphere through the main steam safety valves or the atmospheric steam dump valves.

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 and 500 gallons per day from any one SG or is assumed to increase to these values 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 3.4.8, "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), 10 CFR 100 (Ref. 7), or the NRC approved licensing basis (e.g., a small fraction of these limits).

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

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 a 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 6.7.6.k, "Steam Generator (SG) Program," and describe acceptable SG tube performance. The Steam Generator Program also provides the evaluation process for determining conformance with the SG performance criteria. There are three SG performance criteria: structural integrity, accident-induced leakage, and operational leakage. Failure to meet any one of these criteria is considered failure to meet the LCO.

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

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 significantly affect on burst or collapse. In that context, the term "significant" is defined as "An accident loading condition other than differential pressure is considered significant when the addition of such loads in the assessment of the structural integrity performance criterion could cause a lower structural limit or limiting burst/collapse condition to be established." 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. 4) and Draft Regulatory Guide 1.121 (Ref. 5).

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 analyses assumes that accident-induced leakage does not exceed 500 gpd in any SG and that the total accident 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 3.4.6.2, "Reactor Coolant System 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.

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

APPLICABILITY

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 in MODES 1, 2, 3, or 4.

RCS conditions are far less challenging 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 the actions may be entered independently for each SG tube. This is acceptable because the actions provide appropriate compensatory actions for each affected SG tube. Complying with the actions may allow for continued operation, and subsequent affected SG tubes are governed by subsequent entry and application of associated actions.

a and b

Action 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 4.4.5.2. 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, Action 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, Action a allows plant 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 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.

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

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 shutdown 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

4.4.5.1

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 function of degradation morphology, nondestructive examination (NDE) technique capabilities, and inspection locations.

The Steam Generator Program defines the Frequency of SR 4.4.5.1. The Frequency is determined by the operational assessment and other limits in the SG examination guidelines (Ref. 6). 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 6.7.6.k contains prescriptive requirements concerning inspection intervals to provide added assurance that the SG performance criteria will be met between scheduled inspections.

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

SR 4.4.5.2

During a 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 6.7.6.k 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

4. ASME Boiler and Pressure Vessel Code, Section III, Subsection NB.

5. Draft Regulatory Guide 1.121, “Basis for Plugging Degraded Steam Generator Tubes,” August 1976.

6. EPRI, “Pressurized Water Reactor Steam Generator Examination Guidelines.”

7. 10 CFR 100

REACTOR COOLANT SYSTEM LEAKAGE

3/4.4.6 REACTOR COOLANT SYSTEM LEAKAGE

3/4.4.6.1 LEAKAGE DETECTION SYSTEMS

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

3/4.4.6.2 OPERATIONAL-LEAKAGE

BACKGROUND

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 plant 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 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.

10 CFR 50, Appendix A, GDC 30 (Ref. 1), requires means for detecting and, to the extent practical, identifying the source of reactor coolant leakage. Regulatory Guide 1.45 (Ref. 2) describes acceptable methods for selecting leakage detection systems.

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.

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).

REACTOR COOLANT SYSTEM LEAKAGE

3/4.4.6.2 OPERATIONAL LEAKAGE (Continued)

APPLICABLE SAFETY ANALYSIS

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 and 500 gallons per day from any one SG or increases to these values 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 steam line break (SLB) accident. To a lesser extent, 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 FSAR (Ref. 3) analyses for SLB and SGTR assume one gallon per minute primary to secondary leakage. For the SLB, the tube leakage is conservatively apportioned as 500 gpd to the faulted SG and 940 gpd total to the other three SGs in order to maximize dose consequences. Similarly, the SGTR analysis assumes the tube leakage is 313.33 gpd to the faulted SG and 1126.67 gpd total to the other three SGs in order to maximize dose consequences. The dose consequences resulting from these accidents are within the limits defined in 10 CFR 50.67, 10 CFR 100, or the staff approved licensing basis (i.e., a small fraction of these limits). The RCS operational leakage satisfies Criterion 2 of 10 CFR 50.36(c)(2)(ii).

LCO

RCS operational leakage shall be limited to:

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.

REACTOR COOLANT SYSTEM LEAKAGE

3/4.4.6.2 OPERATIONAL LEAKAGE (Continued)

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.

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. Violation of this LCO could result in continued degradation of a component or system.

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 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.

Controlled Leakage

The CONTROLLED LEAKAGE limitation restricts operation when the total flow supplied to the reactor coolant pump seals exceeds 40 gpm with the modulating valve in the supply line fully open at a nominal RCS pressure of 2235 psig. This limitation ensures that in the event of a LOCA, the safety injection flow will not be less than assumed in the safety analyses.

REACTOR COOLANT SYSTEM LEAKAGE

3/4.4.6.2 OPERATIONAL LEAKAGE (Continued)

Pressure Isolation Valve Leakage

The specified allowed leakage from any RCS pressure isolation valve is sufficiently low to ensure early detection of possible in-series check valve failure. It is apparent that when pressure isolation is provided by two in-series check valves and when failure of one valve in the pair can go undetected for a substantial length of time, verification of valve integrity is required. Since these valves are important in preventing over-pressurization and rupture of the ECCS low pressure piping which could result in a LOCA that bypasses containment, these valves should be tested periodically to ensure low probability of gross failure.

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.

ACTIONS

Unidentified leakage, identified leakage (excluding primary to secondary leakage), or controlled 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.

If any pressure boundary leakage exists or primary to secondary leakage is not within limit; or if unidentified leakage, identified leakage, or controlled 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 plant conditions from full power conditions in an orderly manner and without challenging plant systems. In MODE 5, the pressure stresses acting on the RCPB are much lower, and further deterioration is much less likely.

REACTOR COOLANT SYSTEM LEAKAGE

3/4.4.6.2 OPERATIONAL LEAKAGE (Continued)

SURVEILLANCE REQUIREMENTS

4.4.6.2.1

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 footnotes. Footnote 1 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. Footnote 2 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 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 3.4.6.1, "RCS Leakage Detection Instrumentation."

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

REACTOR COOLANT SYSTEM LEAKAGE

3/4.4.6.2 OPERATIONAL LEAKAGE (Continued)

SR 4.4.6.2.1.f verifies that primary to secondary leakage is less 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 3.4.5, "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, the entire primary to secondary leakage should be conservatively assumed to be from one SG.

The Surveillance is modified by a footnote that states 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).

4.4.6.2.2

The Surveillance Requirements for RCS pressure isolation valves provide added assurance of valve integrity thereby reducing the probability of gross valve failure and consequent intersystem LOCA. 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.

REFERENCES

1. 10 CFR 50, Appendix A, GDC 30.
2. Regulatory Guide 1.45, May 1973.
3. FSAR, Section 15.
4. NEI 97-06, "Steam Generator Program Guidelines."
5. EPRI, "Pressurized Water Reactor Primary-to Secondary Leak Guidelines."

3/4.4.7 (THIS SPECIFICATION NUMBER IS NOT USED)

3/4.4.8 SPECIFIC ACTIVITY

The limitations on the specific activity of the reactor coolant ensure that the resulting 2-hour doses at the SITE BOUNDARY will not exceed an appropriately small fraction of 10 CFR Part 100 dose guideline values following a steam generator tube rupture accident in conjunction with an assumed steady-state reactor-to-secondary steam generator leakage rate of 1 gpm. The values for the limits on specific activity represent limits based upon a parametric evaluation by the NRC of typical site locations. These values are conservative in that specific site parameters of the Seabrook site, such as SITE BOUNDARY location and meteorological conditions, were not considered in this evaluation.

3/4.4.8 SPECIFIC ACTIVITY (Continued)

The sample analysis for determining the gross specific activity and $\bar{E}$ can exclude the radioiodines because of the low reactor coolant limit of 1 microCurie/gram DOSE EQUIVALENT I-131, and because, if the limit is exceeded, the radioiodine level is to be determined every 4 hours. If the gross specific activity level and radioiodine level in the reactor coolant were at their limits, the radioiodine contribution would be approximately 1%. In a release of reactor coolant with a typical mixture of radioactivity, the actual radioiodine contribution would probably be about 20%. The exclusion of radionuclides with half-lives less than 10 minutes from these determinations has been made for several reasons. The first consideration is the difficulty to identify short-lived radionuclides in a sample that requires a significant time to collect, transport, and analyze. The second consideration is the predictable delay time between the postulated release of radioactivity from the reactor coolant to its release to the environment and transport to the SITE BOUNDARY, which is relatable to at least 30 minutes' decay time. The choice of 10 minutes for the half-life cutoff was made because of the nuclear characteristics of the typical reactor coolant radioactivity. The radionuclides in the typical reactor coolant have half-lives of less than 4 minutes or half-lives of greater than 14 minutes, which allows a distinction between the radionuclides above and below a half-life of 10 minutes. For these reasons the radionuclides that are excluded from consideration are expected to decay to very low levels before they could be transported from the reactor coolant to the SITE BOUNDARY under any accident condition.

Reducing T_{avg} to less than 500°F prevents the release of activity should a steam generator tube rupture, since the saturation pressure of the reactor coolant is below the lift pressure of the atmospheric steam relief valves. The Surveillance Requirements provide adequate assurance that excessive specific activity levels in the reactor coolant will be detected in sufficient time to take corrective action. A reduction in frequency of isotopic analyses following power changes may be permissible if justified by the data obtained.

A note permits the use of the provisions of LCO 3.0.4.c for DOSE EQUIVALENT IODINE-131. This allowance permits entry into the applicable MODES while relying on the ACTIONS.

3/4.4.9 PRESSURE/TEMPERATURE LIMITS

The temperature and pressure changes during heatup and cooldown are limited to be consistent with the requirements given in the ASME Boiler and Pressure Vessel Code, Section XI, Appendix G, Reference (1):

1. The reactor coolant temperature and pressure and system heatup and cooldown rates (with the exception of the pressurizer) shall be limited in accordance with Figures 3.4-2 and 3.4-3 for the service period specified thereon:

   a. Allowable combinations of pressure and temperature for specific temperature change rates are below and to the right of the limit lines shown. Limit lines for cooldown rates between those presented may be obtained by interpolation; and

   b. Figures 3.4-2 and 3.4-3 define limits to assure prevention of non-ductile failure only. For normal operation, other inherent plant characteristics, e.g., pump heat addition and pressurizer heater capacity, may limit the heatup and cooldown rates that can be achieved over certain pressure-temperature ranges.

2. These limit lines shall be calculated periodically using methods provided below,

3. The secondary side of the steam generator must not be pressurized above 200 psig if the temperature of the steam generator is below 70°F,

4. The pressurizer heatup and cooldown rates shall not exceed 100°F/h and 200°F/h, respectively. The spray shall not be used if the temperature difference between the pressurizer and the spray fluid is greater than 320°F, and

5. System preservice hydrotests and inservice leak and hydrotests shall be performed at pressures in accordance with the requirements of ASME Boiler and Pressure Vessel Code, Section XI.

Operation within the limits of the appropriate heatup and cooldown curves assures the integrity of the reactor vessel's ferritic material against fracture induced by combined thermal and pressure stresses. As the reactor vessel is subjected to increasing fluence, the toughness of the limiting beltline region material continues to diminish, and consequently, even more restrictive pressure/temperature (P/T) limits must be maintained. Each P/T limit curve defines an acceptable region for normal operation during heatup or cooldown maneuvering as pressure and temperature indications are monitored to ensure that operation is within the allowable region. A heatup or cooldown is defined as a temperature change of greater than or equal to 10°F in any one-hour period.

3/4.4.9 PRESSURE/TEMPERATURE LIMITS (Continued)

The P/T limits have been established in accordance with the requirements of ASME Boiler and Pressure Vessel Code Section XI, Appendix G, as modified by ASME Code Case N-641, Reference (2), and the additional requirements of 10CFR50 Appendix G, Reference (3). The heatup and cooldown P/T limit curves for normal operation, Figures 3.4-2 and 3.4-3 respectively, are valid for a service period of 20 effective full power years (EFPY). The technical justification and methodologies utilized in their development are documented in WCAP-15745, Reference (4). The P/T curves were generated based on the latest available reactor vessel information and latest calculated fluences.

Heatup and Cooldown limit curves are calculated using the adjusted RT_{NDT} (reference nil-ductility temperature) corresponding to the limiting beltline region material of the reactor vessel. The adjusted RT_{NDT} of the limiting material in the core region of the reactor vessel is determined by using the unirradiated reactor vessel material fracture toughness properties, estimating the radiation-induced ΔRT_{NDT}, and adding a margin. RT_{NDT} increases as the material is exposed to fast-neutron radiation. Therefore, to find the most limiting RT_{NDT} at any time period in the reactor's life, ΔRT_{NDT} due to the radiation exposure associated with that time period must be added to the unirradiated RT_{NDT} (IRT_{NDT}). The extent of the shift in RT_{NDT} is enhanced by certain chemical elements (such as copper and nickel) present in reactor vessel steels. The Nuclear Regulatory Commission (NRC) has published a method for predicting radiation embrittlement in Regulatory Guide 1.99, Revision 2, Reference (5). Regulatory Guide 1.99, Revision 2, is used for the calculation of Adjusted Reference Temperature (ART) values (IRT_{NDT} + ΔRT_{NDT} + margins for uncertainties) at the 1/4T and 3/4T locations, where T is the thickness of the vessel at the beltline region.

The reactor vessel materials have been tested to determine their initial RT_{NDT}. Reactor operation and resultant fast neutron (E greater than 1 MeV) irradiation can cause an increase in the RT_{NDT}. Therefore, an adjusted reference temperature, based upon the fluence, best estimate copper and nickel content of the limiting beltline material, can be predicted using surveillance capsule data and the value of ΔRT_{NDT} computed by Regulatory Guide 1.99, Revision 2. Surveillance capsule data, documented in Reference (6), is available for two capsules (Capsules U and Y) having already been removed from the reactor vessel. This surveillance capsule data was used to calculate chemistry factor (CF) values per Position 2.1 of Regulatory Guide 1.99, Revision 2. It also noted that Reference (6) concluded that all the surveillance data was credible as the beltline material was behaving as empirically predicted. The heatup and cooldown limit curves of Figures 3.4-2 and 3.4-3 include predicted adjustments for this shift in RT_{NDT} at the end of 20 EFPY as well as adjustments for possible errors in the pressure and temperature sensing instruments.

3/4.4.9 PRESSURE/TEMPERATURE LIMITS (Continued)

The results from the material surveillance program were evaluated according to ASTM E185. Capsules U and Y were removed in accordance with the requirements of ASTM E185-73 and 10CFR50, Appendix H. The lead factor represents the relationship between the fast neutron flux density at the location of the capsule and the inner wall of the reactor vessel. Therefore, the results obtained from the surveillance specimens were used to predict future radiation damage to the reactor vessel material by using the lead factor and the withdrawal time of the capsule. The fluence values used to determine the CFs are the calculated fluence values at the surveillance capsule locations. The calculated fluence values were used for all cases. All calculated fluence values (capsule and projections) are documented in Reference (6). These fluences were calculated using the ENDF/B-VI scattering cross-section data set. The measured ΔRT_{NDT} values for the weld data were adjusted for chemistry using the ratio procedure given in Position 2.1 of Regulatory Guide 1.99, Revision 2.

FIGURE B 3/4.4-1

(THIS FIGURE NUMBER IS NOT USED)

TABLE B 3/4.4-1

(THIS TABLE NUMBER IS NOT USED)

3/4.4.9 PRESSURE/TEMPERATURE LIMITS (Continued)

The ASME approach for calculating the allowable limit curves for various heatup and cooldown rates specifies that the total stress intensity factor, K_I, for the combined thermal and pressure stresses at any time during heatup or cooldown cannot be greater than the reference stress intensity factor, K_{Ic}, for the metal temperature at that time. K_{Ic} is obtained from the reference fracture toughness curve, defined in Code Case N-641, Reference (2). The K_{Ic} curve is given by the following equation:

$$K_{Ic} = 33.2 + 20.734 * e^{[0.02(T - RT_{NDT})]} \qquad (1)$$

where,

K_{Ic} = reference stress intensity factor as a function of the metal temperature T and the metal reference nil-ductility temperature RT_{NDT}

This K_{Ic} curve is based on the lower bound of static critical K_I values measured as a function of temperature on specimens of SA-533 Grade B Class 1, SA-508-1, SA-508-2, and SA-508-3 steel.

The governing equation for the heatup-cooldown analysis is defined in Appendix G of the ASME Code as follows:

$$C^* K_{Im} + K_{It} < K_{Ic} \qquad (2)$$

where,

K_{Im} = stress intensity factor caused by membrane (pressure) stress

K_{It} = stress intensity factor caused by the thermal gradients

K_{Ic} = function of temperature relative to the RT_{NDT} of the material

C = 2.0 for Level A and Level B service limits

C = 1.5 for hydrostatic and leak test conditions during which the reactor core is not critical

At any time during the heatup or cooldown transient, K_{Ic} is determined by the metal temperature at the tip of a postulated flaw at the 1/4T and 3/4T location, the appropriate value for RT_{NDT}, and the reference fracture toughness curve. The thermal stresses resulting from the temperature gradients through the vessel wall are calculated and then the corresponding (thermal) stress intensity factors, K_{It}, for the reference flaw are computed. From Equation 2, the pressure stress intensity factors are obtained and, from these, the allowable pressures are calculated.

3/4.4.9 PRESSURE/TEMPERATURE LIMITS (Continued)

COOLDOWN

For the calculation of the allowable pressure versus coolant temperature during cooldown, the reference flaw of Appendix G to the ASME Code is assumed to exist at the inside of the vessel wall. During cooldown, the controlling location of the flaw is always at the inside of the wall because the thermal gradients produce tensile stresses at the inside, which increase with increasing cooldown rates. Allowable pressure-temperature relations are generated for both steady-state and finite cooldown rate situations. From these relations, composite limit curves are constructed for each cooldown rate of interest.

The use of the composite curve in the cooldown analysis is necessary because control of the cooldown procedure is based on measurement of reactor coolant temperature, whereas the limiting pressure is actually dependent on the material temperature at the tip of the assumed flaw. During cooldown, the 1/4T vessel location is at a higher temperature than the fluid adjacent to the vessel ID. This condition, of course, is not true for the steady-state situation. It follows that at any given reactor coolant temperature, the ΔT developed during cooldown results in a higher value of K_{Ic} at the 1/4T location for finite cooldown rates than for steady-state operation. Furthermore, if conditions exist such that the increase in K_{Ic} exceeds K_{It}, the calculated allowable pressure during cooldown will be greater than the steady-state value.

The above procedures are needed because there is no direct control on temperature at the 1/4T location; therefore, allowable pressures may unknowingly be violated if the rate of cooling is decreased at various intervals along a cooldown ramp. The use of the composite curve eliminates this problem and assures conservative operation of the system for the entire cooldown period.

HEATUP

Three separate calculations are required to determine the limit curves for finite heatup rates. As is done in the cooldown analysis, allowable pressure-temperature relationships are developed for steady-state conditions as well as finite heatup rate conditions assuming the presence of a 1/4T defect at the inside of the vessel wall. The heatup results in compressive stresses at the inside surface of the wall that alleviate the tensile stresses produced by internal pressure. The metal temperature at the crack tip lags the coolant temperature; therefore, the K_{Ic} for the 1/4T crack during heatup is lower than the K_{Ic} for the 1/4T crack during steady-state conditions at the same coolant temperature.

3/4.4.9 PRESSURE/TEMPERATURE LIMITS (Continued)

HEATUP (Continued)

During heatup, especially at the end of the transient, conditions may exist such that the effects of compressive thermal stresses and lower K_{Ic} values for steady-state and finite heatup rates do not offset each other and the pressure-temperature curve based on steady-state conditions no longer represents a lower bound of all similar curves for finite heatup rates when the 1/4T flaw is considered. Therefore, both cases have to be analyzed in order to assure that at any coolant temperature the lower value of the allowable pressure calculated for steady-state and finite heatup rates is obtained.

The second portion of the heatup analysis concerns the calculation of pressure-temperature limitations for the case in which a 1/4T flaw located at the 1/4T location from the outside surface is assumed. Unlike the situation at the vessel inside surface, the thermal gradients established at the outside surface during heatup produce stresses which are tensile in nature and thus tend to reinforce any pressure stresses present. These thermal stresses are dependent on both the rate of heatup and the time (or coolant temperature) along the heatup ramp. Since the thermal stresses at the outside are tensile and increase with increasing heatup rate, a lower bound curve cannot be defined. Rather, each heatup rate of interest must be analyzed on an individual basis.

Following the generation of pressure-temperature curves for both the steady-state and finite heatup rate situations, the final limit curves are produced as follows. A composite curve is constructed based on a point-by-point comparison of the steady-state and finite heatup rate data. At any given temperature, the allowable pressure is taken to be the lesser of the three values taken from the curves under consideration. The use of the composite curve is necessary to set conservative heatup limitations because it is possible for conditions to exist wherein, over the course of the heatup ramp, the controlling condition switches from the inside to the outside and the pressure limit must at all times be based on analysis of the most critical criterion.

Finally, the composite curves for the heatup rate data and the cooldown rate data are adjusted for possible errors in the pressure and temperature sensing instruments by the values indicated on the respective curves.

3/4.4.9 PRESSURE/TEMPERATURE LIMITS (Continued)

HEATUP (Continued)

10 CFR Part 50, Appendix G, Reference (3), addresses the metal temperature of the closure head flange and vessel flange regions. This rule states that the metal temperature of the closure flange regions must exceed the material unirradiated RT_{NDT} by at least 120°F for normal operation when the pressure exceeds 20 percent of the preservice hydrostatic test pressure (3106 psi), which in this case is 621 psig. The limiting unirradiated RT_{NDT} of 30°F occurs in the vessel flange of the reactor vessel, consequently the minimum allowable temperature of this region is 150°F at pressures greater than 621 psig. This limit is shown as the horizontal lines in Figures 3.4-2 and 3.4-3. (NOTE: Figures 3.4-2 and 3.4-3 include a compensation of 20°F and 100 psig for possible instrument errors.)

Although the pressurizer operates in temperature ranges above those for which there is reason for concern of nonductile failure, operating limits are provided to assure compatibility of operation with the fatigue analysis performed in accordance with the ASME Code requirements.

References

1. ASME Boiler and Pressure Vessel Code, Section XI, Appendix G, "Fracture Toughness Criteria for Protection Against Failure", dated December 1995, through 1996 Addendum.

2. ASME Boiler and Pressure Vessel Code Case N-641, Section XI, Division 1, "Alternative Pressure-Temperature Relationship and Overpressure Protection System Requirements", dated January 17, 2000.

3. 10 CFR Part 50, Appendix G, "Fracture Toughness Requirements", U.S. Nuclear Regulatory Commission, Federal Register, Volume 60, No. 243, dated December 19, 1995.

4. Westinghouse WCAP-15745, Revision 0, "Seabrook Unit 1 Heatup and Cooldown Limit Curves for Normal Operation", dated December 2001.

5. Regulatory Guide 1.99, Revision 2, "Radiation Embrittlement of Reactor Vessel Materials", U. S. Nuclear Regulatory Commission, dated May 1988.

6. Duke Engineering and Services Report DES-NFQA-98-01, Revision 0, "Analysis of Seabrook Station Unit I Reactor Vessel Surveillance Capsules U and Y", dated May 1998.

3/4.4.9 PRESSURE/TEMPERATURE LIMITS (Continued)

COLD OVERPRESSURE PROTECTION (Continued)

The OPERABILITY of two PORVs, or two RHR suction relief valves, or a combination of a PORV and RHR suction relief valve, or an RCS vent opening of at least 1.58 square inches ensures that the RCS will be protected from pressure transients which could exceed the limits of Appendix G to 10 CFR Part 50 when one or more of the RCS cold legs are less than or equal to 290°F. Either PORV or either RHR suction relief valve has adequate relieving capability to protect the RCS from overpressurization when the transient is limited to either: (1) the start of an idle RCP with the secondary water temperature of the steam generator less than or equal to 50°F above the RCS cold leg temperatures, or (2) the start of a centrifugal charging pump and its injection into a water-solid RCS.

The Maximum Allowed PORV Setpoint for the Cold Overpressure Mitigation System (COMS) is derived by analysis which models the performance of the COMS assuming various mass input and heat input transients. Operation with a PORV Setpoint less than or equal to the maximum Setpoint ensures that Appendix G criteria will not be violated with consideration for: (1) a maximum pressure overshoot beyond the PORV Setpoint which can occur as a result of time delays in signal processing and valve opening; (2) a 50°F heat transport effect made possible by the geometrical relationship of the RHR suction line and the RCS wide range temperature indicator used for COMS; (3) instrument uncertainties; and (4) single failure. To ensure mass and heat input transients more severe than those assumed cannot occur, Technical Specifications require both Safety injection pumps and all but one centrifugal charging pump to be made inoperable while in MODES 4, 5, and 6 with the reactor vessel head installed and not fully detensioned, and disallow start of an RCP if secondary coolant temperature is more than 50°F above reactor coolant temperature. Exceptions to these requirements are acceptable as described below.

Operation above 350°F but less than 375°F with only one centrifugal charging pump OPERABLE and no Safety Injection pumps OPERABLE is allowed for up to 4 hours. As shown by analysis, LOCAs occurring at low temperature, low pressure conditions can be successfully mitigated by the operation of a single centrifugal charging pump and a single RHR pump with no credit for accumulator injection. Given the short time duration and the condition of having only one centrifugal charging pump OPERABLE and the probability of a LOCA occurring during this time, the failure of the single centrifugal charging pump is not assumed.

Operation below 350°F but greater than 325°F with all centrifugal charging and Safety Injection pumps OPERABLE is allowed for up to 4 hours. During low pressure, low temperature operation all automatic Safety Injection actuation signals except Containment Pressure-High are blocked. In normal conditions, a single failure of the

3/4.4.9 PRESSURE/TEMPERATURE LIMITS (Continued)

COLD OVERPRESSURE PROTECTION (Continued)

ESF actuation circuitry will result in the starting of at most one train of Safety Injection (one centrifugal charging pump, and one Safety Injection pump). For temperatures above 325°F, an overpressure event occurring as a result of starting two pumps can be successfully mitigated by operation of both PORVs without exceeding Appendix G limit. A single failure of a PORV is not assumed due to the short duration that this condition is allowed and the low probability of an event occurring during this interval in conjunction with the failure of a PORV to open. Initiation of both trains of Safety Injection during this 4-hour time frame due to operator error or a single failure occurring during testing of a redundant channel are not considered to be credible accidents.

Operation with all centrifugal charging pumps and both Safety Injection pumps OPERABLE is acceptable when RCS temperature is greater than 350°F, a single PORV has sufficient capacity to relieve the combined flow rate of all pumps. Above 350°F two RCPs and all pressure safety valves are required to be OPERABLE. Operation of an RCP eliminates the possibility of a 50°F difference existing between indicated and actual RCS temperature as a result of heat transport effects. Considering instrument uncertainties only, an indicated RCS temperature of 350°F is sufficiently high to allow full RCS pressurization in accordance with Appendix G limitations. Should an overpressure event occur in these conditions, the pressurizer safety valves provide acceptable and redundant overpressure protection.

A Note prohibits the application of LCO 3.0.4.b to an inoperable LTOP system. There is an increased risk associated with entering MODE 4 from MODE 5 with LTOP inoperable and the provisions of LCO 3.0.4.b, which allow entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, should not be applied in this circumstance.

When operating below 200°F in MODE 5 or MODE 6 with the reactor vessel head on and the vessel head closure bolts not fully detensioned, Technical Specification 3.5.3.2 allows one Safety Injection pump to be made OPERABLE whenever the RCS has a vent area equal to or greater than 18 square inches or whenever the RCS is in a reduced inventory condition, i.e., whenever reactor vessel water level is lower than 36 inches below the reactor vessel flange. Cold overpressure protection provided by the venting method utilizes an 18 square inch or greater mechanical opening in the RCS pressure boundary. This mechanical opening is larger in size than the 1.58 square inch opening required for normal overpressure protection and is of sufficient size to ensure that the Appendix G limits are not exceeded when an SI pump is operating in MODE 5 or MODE 6 with the reactor vessel head on and the vessel head closure bolts not fully detensioned. When the reactor has been shut down for at least 7 days, the larger vent area also enhances the ability to

3/4.4.9 PRESSURE/TEMPERATURE LIMITS (Continued)

COLD OVERPRESSURE PROTECTION (Continued)

provide a gravity feed to the RCS from the Refueling Water Storage Tank in the unlikely event that the CCP and SI pumps were unavailable after a loss of RHR. Additionally, when steam generator nozzle dams are installed for maintenance purposes and the reactor vessel water level is not in a reduced inventory condition, the larger vent area limits RCS pressure during overpressure transients to reduce the possibility of adversely affecting steam generator nozzle dams.

When the reactor vessel head is on and the vessel head closure bolts are fully detensioned, a substantial vent area exists by the gap underneath the reactor vessel head, created by the internal spring forces. A measured gap of greater than or equal to 0.03 inches is of sufficient size to provide for cold overpressure protection, for gravity feed from the RWST, and ensuring nozzle dam integrity (calculation C-S-1-84012). Verification of sufficient gap will be performed prior to crediting the gap as a means for cold overpressure protection.

Cold overpressure protection can also be provided when operating at a reduced inventory condition, i.e., whenever reactor vessel water level is lower than 36 inches below the reactor vessel flange. With RCS water level lower than 36 inches below the RV flange in Mode 5 or Mode 6 with the RV head on and the closure bolts not fully detensioned, a mass addition transient involving simultaneous operation of a CCP and a SI pump without letdown will not result in a cold overpressurization condition because of the relatively large void volume in the RCS. This void volume consists of the upper plenum of the reactor vessel and the RV head, the pressurizer and steam generator tubes, as a minimum. The relatively large void volume affords ample time for operator action, (e.g., diagnose the water level increase on main control board instrumentation and stopping the pumps) to mitigate the transient. A minimum time of 50 minutes has been determined based on one charging pump operating at 120 gpm without letdown and a Safety Injection pump injecting into the RCS.

The charging pumps and Safety Injection pumps are rendered incapable of injecting into the RCS through removing the power from the pumps by racking the motor circuit breakers out under administrative control. An alternate method of preventing cold overpressurization may be employed. The alternate method uses at least two independent means to prevent cold overpressurization such that a single action will not result in an inadvertent injection into the RCS. This may be accomplished through the pump control switch being placed in Pull-to-Lock position and at least one valve in the discharge flow path closed. The alternate method provides the ability to respond to abnormal situations, expeditiously, from the main control room.

3/4.4.9 PRESSURE/TEMPERATURE LIMITS (Continued)

COLD OVERPRESSURE PROTECTION (Continued)

During charging pump swap operation two charging pumps may be made capable of injecting into the RCS for up to 1 hour. This provision prevents securing charging for the purpose of not having more than the allowable pumps operable in order to limit thermal fatigue cycles on piping and impact seal injection to the Reactor Coolant Pumps (RCP) which has seal degradation potential. Given the short time duration of the evolution and the evolution controlled under administrative controls, e.g., prohibiting pump swap operation during RCS water-solid conditions, a cold overpressurization condition occurring as a result of an uncontrolled mass addition transient is unlikely.

Charging and/or Safety Injection pumps, normally rendered inoperable for cold overpressure protection may be operated as required under administrative controls during abnormal situations involving a loss of decay heat removal capability or an unexpected reduction in RCS inventory. Maintaining adequate core cooling and RCS inventory during these abnormal situations is essential for public health and safety. Administrative controls ensure that a cold overpressurization condition will not occur as a result of an uncontrolled mass addition transient.

The Maximum Allowed PORV Setpoint for the Cold Overpressure Mitigation System will be revised on the basis of the results of examinations of reactor vessel material irradiation surveillance specimens performed as required by 10 CFR Part 50, Appendix H

3/4.4.10 STRUCTURAL INTEGRITY

The inservice inspection and testing programs for ASME Code Class 1, 2, and 3 components ensure that the structural integrity and operational readiness of these components will be maintained at an acceptable level throughout the life of the plant. These programs are in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50.55a(g) except where specific written relief has been granted by the Commission pursuant to 10 CFR 50.55a(g)(6)(i).

This TS requires maintaining the structural integrity of components classified as ASME Class 1, 2, or 3 under ASME Section XI and applies to any systems that contain these ASME Class components. These components were designed to provide access to permit inservice inspections in accordance with Section XI of the ASME Boiler and Pressure Vessel Code. As stated in Appendix H of WCAP-14535A (November 1996), Appendix VIII of Section XI of the ASME Boiler and Pressure Vessel Code is not applicable when examining the reactor coolant pump flywheels.

If a flaw or pressure boundary leakage is discovered in an ASME Class 1, 2, or 3 component, the condition should be promptly evaluated in accordance with station procedures for degraded or non-conforming conditions. The actions of this TS are applicable to the condition if the evaluation determines that the flaw or leakage is unacceptable and results in a failure to meet the LCO for structural integrity.

The failure of an ASME Class 1 or 2 component to meet structural integrity requirements requires entry into action a or b, respectively. These actions require restoring structural integrity or isolating the affected component prior to increasing temperature above a specified temperature. If the failure of an ASME Class 1 or 2 component to meet structural integrity requirements is discovered with the component not isolated and above the minimum temperature specified in the associated action, TS 3.0.3 is applicable until the conditions specified in the action are satisfied.

Action c addresses the failure of an ASME Class 3 component to conform to the structural integrity requirements and requires restoring structural integrity of the component or isolating the component from service. While the action specifies no completion time, the actions should be timely and on a schedule commensurate with the safety significance of the affected component.

3/4.4.11 REACTOR COOLANT SYSTEM VENTS

Reactor Coolant System vents are provided to exhaust noncondensible gases and/or steam from the Reactor Coolant System that could inhibit natural circulation core cooling. The OPERABILITY of least one Reactor Coolant System vent path from the reactor vessel head and the pressurizer steam space ensures that the capability exists to perform this function.

The valve redundancy of the Reactor Coolant System vent paths serves to minimize the probability of inadvertent or irreversible actuation while ensuring that a single failure of a vent valve, power supply, or control system does not prevent isolation of the vent path.

The function, capabilities, and testing requirements of the Reactor Coolant System vents are consistent with the requirements of Item II.B.1 of NUREG-0737, "Clarification of TMI Action Plant Requirements," November 1980.

3/4.5.2 and 3/4.5.3 ECCS SUBSYSTEMS (Continued)

Each operable RHR subsystem must remain aligned to provide injection into all four RCS cold legs to meet the assumptions in the ECCS analysis. Isolating RHR flow to any RCS cold leg in MODES 1, 2, or 3 would render both trains of ECCS inoperable, placing the plant in a condition outside design bases.

With the RCS temperature below 350°F, the ECCS operational requirements are reduced. Only one OPERABLE ECCS subsystem is acceptable without single failure consideration during MODE 4 operation on the basis of the stable reactivity condition of the reactor and the limited core cooling requirements, as well as the reduced probability of occurrence of a Design Basis Accident (DBA). It is understood in these reductions in operational requirements that certain automatic safety injection (SI) actuation is not available. In this MODE, sufficient time exists for manual actuation of the required ECCS to mitigate the consequences of a DBA. LCO Condition d. requires that an OPERABLE flow path must be capable of taking suction from the refueling water storage tank upon being manually realigned and transferring suction to the containment sump during the recirculation phase of operation. Thus, LCO Condition d. allows for the manual realignment of the OPERABLE ECCS subsystem to support the ECCS mode of operation.

A Note prohibits the application of LCO 3.0.4.b to an inoperable ECCS high head subsystem when entering MODE 4. There is an increased risk associated with entering MODE 4 from MODE 5 with an inoperable ECCS high head subsystem and the provisions of LCO 3.0.4.b, which allow entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, should not be applied in this circumstance.

3/4.6.2 DEPRESSURIZATION AND COOLING SYSTEMS

3/4.6.2.2 SPRAY ADDITIVE SYSTEM (Continued)

Verifying the correct alignment of manual, power-operated, and automatic valves provides assurance that the proper flow paths exist for operation of the Spray Additive System under accident conditions. This verification includes only those valves in the direct flow paths through safety-related equipment whose position is critical to the proper functioning of the safety-related equipment. Vents, drains, sampling connections, instrument taps, etc., that are not directly in the flow path and are not critical to proper functioning of the safety-related equipment are excluded from this surveillance requirement. This surveillance does not apply to valves that are locked, sealed, or otherwise secured in position because these valves are verified in their correct position prior to locking, sealing, or securing. Also, this requirement does not apply to valves that cannot be inadvertently misaligned, such as check valves.

An automatic valve may be aligned in other than its accident position provided (1) the valve receives an automatic signal to re-position to its required position in the event of an accident, and (2) the valve is otherwise operable (stroke time within limits, motive force available to re-position the valve, control circuitry energized, and mechanically capable of re-positioning).

3/4.6.3 CONTAINMENT ISOLATION VALVES

The OPERABILITY of the containment isolation valves (CIV) ensures that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment and is consistent with the requirements of General Design Criteria 54 through 57 of Appendix A to 10 CFR Part 50. Containment isolation within the time limits specified for those isolation valves designed to close automatically ensures that the release of radioactive material to the environment will be consistent with the assumptions used in the analyses for a LOCA.

Closing, deactivating, and securing an operable, fail closed, automatic CIV to isolate a containment penetration to comply with the action of TS 3.6.3 because the redundant CIV is inoperable does not necessitate declaring the valve inoperable provided:

a. The CIV is operable and the valve will revert to an operable active isolation device upon restoration of power or the opening air supply, and

b. No maintenance, repair, or replacement work is performed on the valve or its associated actuator, control, or power circuit that would require a surveillance test to demonstrate operability of the CIV, and

3/4.6.3 CONTAINMENT ISOLATION VALVES (Continued)

c. If the CIV is a dual function valve that renders a TS-required system or component inoperable while deactivated and closed, entry into and compliance with the actions for the inoperable TS-required system or component is necessary.

Closing, deactivating, and securing an operable, fail closed, automatic CIV so that it may serve as an isolation boundary for a clearance order does not necessitate declaring the valve inoperable provided:

a. The CIV is operable and the valve will revert to an operable active isolation device upon restoration of power or the opening air supply, and

b. No maintenance, repair, or replacement work is performed on the valve or its associated actuator, control, or power circuit that would require a surveillance test to demonstrate operability of the CIV, and

c. If the CIV is a dual function valve that renders a TS-required system or component inoperable while deactivated and closed, entry into and compliance with the actions for the inoperable TS-required system or component is necessary.

In addition, a fail closed containment isolation valve that is closed, deactivated, and secured for purposes other than those discussed above may also be considered operable provided the stipulations in items a, b, and c above are met.

The opening of locked or sealed closed containment isolation valves on an intermittent basis under administrative control includes the following considerations: (1) stationing an operator, who is in constant communication with control room, at the valve controls, (2) instructing this operator to close these valves in an accident situation, and (3) assuring that environmental conditions will not preclude access to close the valves and that this action will prevent the release of radioactivity outside the containment.

3/4.7.1 TURBINE CYCLE (Continued)

3/4.7.1.2 AUXILIARY FEEDWATER SYSTEM (Continued)

ACTIONS

Note 1 prohibits the application of LCO 3.0.4.b to an inoperable EFW train when entering MODE 1, and Note 2 prohibits the application of LCO 3.0.4.b to an inoperable startup feedwater pump. There is an increased risk associated with entering MODE 1 with AFW inoperable, or entering MODES 3 or 2 with the startup feedwater pump inoperable. The provisions of LCO 3.0.4.b, which allow entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, should not be applied in this circumstance.

With one AFW pump inoperable, the action provides a 72-hour AOT for restoring the pump to an operable status before requiring a plant shutdown. This time is reasonable based on the availability of redundant equipment and the low probability of an accident occurring during this time. Additional actions with more limiting AOTs apply to conditions involving more than one inoperable AFW pump. In the event that all AFW pumps are inoperable, the plant is in a seriously degraded condition. Consequently, the plant should not be perturbed by any action, including a power change, that might result in a plant trip and demand on the EFW system. The seriousness of this condition requires immediately initiating corrective action to restore at least one AFW pump to operable status as soon as possible.

SURVEILLANCES

Various surveillance requirements, with frequencies ranging from 31 days to eighteen months, demonstrate the operability of the AFW system. Every 31 days, each non-automatic valve in the flow path that is not locked, sealed, or otherwise secured, is verified in its correct position. This verification includes only those valves in the direct flow path through safety-related equipment whose position is critical to the proper functioning of the safety-related equipment. Vents, drains, sampling connections, instrument taps, etc., that are not directly in the flow path and are not critical to proper functioning of the safety-related equipment are excluded from this surveillance requirement.

Testing of the steam-driven EFW pump is exempt from the provisions of TS 4.0.4 for entry into MODE 3. This allowance is necessary because the surveillance testing, which requires a minimum steam pressure of 500 psig, cannot be performed until the plant reaches MODE 3. Once steam pressure reaches 500 psig, administrative controls establish a 24-hour time limit for completing the testing consistent with Specification 4.0.4.

3/4.7.1 TURBINE CYCLE (Continued)

3/4.7.1.3 CONDENSATE STORAGE TANK

The OPERABILITY of the condensate storage tank with the indicated minimum water volume ensures that sufficient water is available to cool the RCS to a temperature of 350°F. The OPERABILITY of the concrete enclosure ensures this availability of water following rupture of the condensate storage tank by a tornado generated missile. The contained water volume limit includes an allowance for water not usable because of instrument uncertainty, tank discharge line location, or other physical characteristics.

3/4.7.1.4 SPECIFIC ACTIVITY

BACKGROUND

Activity in the secondary coolant results from Reactor Coolant System leakage through the steam generator tube(s). Under steady state conditions, the activity is primarily iodines with relatively short half-lives and, thus, indicates current conditions. During transients, I-131 spikes have been observed as well as increased releases of some noble gases. Other fission product isotopes, as well as activated corrosion products in lesser amounts, may also be found in the secondary coolant.

A limit on secondary coolant specific activity during power operation minimizes releases to the environment because of normal operation, anticipated operational occurrences, and accidents.

This limit is lower than the activity value that might be expected from a 1 gpm tube leak (LCO 3.4.6.2, "Reactor Coolant System Leakage - Operational Leakage") of primary coolant at the limit of 1.0 μCi/gm (LCO 3.4.8, "Reactor Coolant System Specific Activity"). The steam line failure is assumed to result in the release of the noble gas and iodine activity contained in the steam generator inventory, the feedwater, and the reactor coolant LEAKAGE. Most of the iodine isotopes have short half-lives (i.e., <20 hours).

With the specified activity limit, the resultant 2-hour thyroid dose to a person at the SITE BOUNDARY would be a small fraction of the 10 CFR 100 (Ref. 1) limits if the main steam safety valves (MSSVs) were open for 2 hours following a trip from full power.

Operating a unit at the allowable limits could result in a 2 hour SITE BOUNDARY exposure of a small fraction of the 10 CFR 100 (Ref. 1) limits, or the limits established as the NRC staff approved licensing basis.

APPLICABLE SAFETY ANALYSES

The accident analysis of the main steam line break (MSLB), as discussed in the UFSAR, Chapter 15 (Ref. 2) assumes the initial secondary coolant specific activity to have

3/4.7.1 TURBINE CYCLE (Continued)

3/4.7.1.4 SPECIFIC ACTIVITY (Continued)

a radioactive isotope concentration of 0.10 μCi/gm DOSE EQUIVALENT I-131. This assumption is used in the analysis for determining the radiological consequences of the postulated accident. The accident analysis, based on this and other assumptions, shows that the radiological consequences of an MSLB do not exceed a small fraction of the unit SITE BOUNDARY limits (Ref. 1) for whole body and thyroid dose rates.

With the loss of offsite power, the remaining steam generators are available for core decay heat dissipation by venting steam to the atmosphere through the MSSVs and steam generator atmospheric dump valves (ADVs). The Emergency Feedwater System supplies the necessary makeup to the steam generators. Venting continues until the reactor coolant temperature and pressure have decreased sufficiently for the Residual Heat Removal System to complete the cooldown.

In the evaluation of the radiological consequences of this accident, the activity released from the steam generator connected to the failed steam line is assumed to be released directly to the environment. The unaffected steam generator is assumed to discharge steam and any entrained activity through the MSSVs and ADVs during the event. Since no credit is taken in the analysis for activity plateout or retention, the resultant radiological consequences represent a conservative estimate of the potential integrated dose due to the postulated steam line failure.

Secondary specific activity limits satisfy Criterion 2 of 10 CFR 50.36(c)(2)(ii).

3/4.7.4 SERVICE WATER SYSTEM/ULTIMATE HEAT SINK (Continued)

The portable makeup pump must have a minimum capacity of 200 gpm, which ensures the capability to meet the calculated makeup requirement of 140 gpm at seven days after a LOCA. A surveillance requirement verifies the ability of the pump to produce flow of at least 200 gpm every 18 months. In addition, a monthly inventory and periodic inspections of the hose confirm the availability and integrity of sufficient flexible hose.

The seven-day period during which the cooling tower can operate without makeup water provides adequate time to move the portable pump into position, lay the hose, and make the system ready for operation. As a result, the portable pump is not necessarily immediately available for operation when stored in its design operational readiness state. The seven-day period allows ample time to charge the battery, obtain diesel fuel, inflate the trailer tires, and obtain a tow vehicle.

Switchover from the service water pumphouse to the mechanical draft cooling tower is accomplished either automatically (Tower Actuation (TA) signal) or manually. Manual action is required to realign the system from the cooling tower to the service water pumphouse. While a cooling tower pump is operating, interlocks prevent the train associated service water pumps from starting. To provide additional protection, during operation while aligned to the cooling tower, the service water pump control switches may be maintained in the pull-to-lock position to prevent inadvertent pump operation. As previously discussed, realignment to the service water pumphouse requires manual action; maintaining the control switches in the pull-to-lock position does not change this required action sequence. Pump operation is not affected by maintaining the control switches in the pull-to-lock position during this period; therefore, OPERABILITY of the service water pumps is not compromised.

The limitations on service water pumphouse minimum water level and the requirements for cooling tower OPERABILITY are based on providing a 30-day cooling water supply to safety-related equipment without exceeding the safety related equipment design basis temperature and is consistent with the recommendations of Regulatory Guide 1.27, "Ultimate Heat Sink for Nuclear Plants," March 1974.

The Cooling Tower is normally aligned to allow return flow to bypass the tower sprays and return to the basin. Upon receipt of a Tower Actuation Signal, the fans and sprays are manually operated as required. This manual operation, which is governed by procedures, ensures that ice does not buildup on the cooling tower tile fill and fans. The cooling tower basin temperature limit of 70°F provides sufficient time for manual initiation of the cooling tower sprays and fans following the design basis seismic event with a concurrent LOCA, during the design extreme ambient temperature conditions. Under this scenario, manual action is sufficient to maintain the cooling tower basin at a temperature which precludes equipment damage during the postulated design basis event.

3/4.7.6 CONTROL ROOM SUBSYSTEMS (Continued)

The OPERABILITY of the Control Room Emergency Makeup Air and Filtration Subsystem is also contingent on maintaining the integrity of the Control Room complex envelope. Envelope integrity is maintained by controlling activities that could introduce sources of makeup air or infiltration of unfiltered air other than that assumed in the UFSAR. Examples of activities that could render either or both subsystem trains inoperable: (1) removal of penetration seals; (2) blocking open or removing either Control Room door (C312, C325); (3) open access doors to filter units 1-CBA-F-38, 8038; (4) repositioning of remote intake manual isolation valves 1, 2-CBA-V9; (5) any activity which allows makeup air to be drawn into the system from locations other than the remote intakes (e.g., removal of an opacity detector or radiation monitor in the DG Building, cutting of either makeup air line, etc.). Breaches to the envelope shall be controlled by station programs and may require an engineering evaluation to ensure UFSAR assumptions remain valid. Refer to Engineering Evaluation 91-39, Rev. 1 and CR 02-16293 for specific information and compensatory measures.

During normal and emergency operation, both remote air intakes are aligned to deliver air to the control room. Repositioning either remote intake manual isolation valve (1-CBA-V9 or 2-CBA-V9) will render both trains of the control room emergency makeup air and filtration system inoperable unless makeup airflows are determined to remain within acceptable values. During an abnormal plant condition, such as smoke or other potentially harmful material entering an intake, one remote intake may be closed after placing the system in the filter recirculation mode without affecting system operability.

The OPERABILITY of the safety-related Control Room Air Conditioning Subsystem ensures that the allowable temperature for continuous-duty rating for the equipment and instrumentation cooled by this system is not exceeded. The safety-related Control Room Air Conditioning Subsystem consists of two independent and redundant trains that provide cooling of recirculated control room air. The design basis of the safety-related Control Room Air Conditioning Subsystem is to maintain the control room temperature for 30 days of continued occupancy. The safety-related chillers are designed to operate in conditions down to the design basis winter temperature. When the chiller units unload due to insufficient heat load on the system, each Control Room air Conditioning Subsystem remains operable. Surveillance to demonstrate OPERABILITY will verify each subsystem has the capability to maintain the control room area temperature less than the limiting equipment qualification temperature. The operational surveillance will be performed on a quarterly basis, requiring each safety-related Control Room Air Conditioning Subsystem to operate over a twenty-four hour period. This will ensure the safety related subsystem can remove the heat load based on daily cyclic outdoor air temperature.

The Control Room Air Conditioning fans are necessary to support both the operation of the Control Room Emergency Makeup Air and Filtration and the Control Room Air Conditioning Subsystems.

3/4.7.7 SNUBBERS

All snubbers are required OPERABLE to ensure that the structural integrity of the Reactor Coolant System and all other safety-related systems is maintained during and following a seismic or other event initiating dynamic loads.

Snubbers are classified and grouped by design and manufacturer but not by size. For example, mechanical snubbers utilizing the same design features of the 2-kip, 10-kip and 100-kip capacity manufactured by Company "A" are of the same type. The same design mechanical snubbers manufactured by Company "B" for the purposes of this Technical Specification would be of a different type, as would hydraulic snubbers from either manufacturer.

A list of individual snubbers with detailed information of snubber location and size and of system affected shall be available at the plant in accordance with Section 50.71(c) of 10 CFR Part 50. The accessibility of each snubber shall be determined and approved by the Station Operation Review Committee (SORC). The determination shall be based upon the existing radiation levels and the expected time to perform a visual inspection in each snubber location as well as other factors associated with accessibility during plant operations (e.g., temperature, atmosphere, location, etc.), and the recommendations of Regulatory Guides 8.8 and 8.10. The addition or deletion of any hydraulic or mechanical snubber shall be made in accordance with Section 50.59 of 10 CFR Part 50.

Surveillance to demonstrate OPERABILITY is by performance of the requirements of an approved inservice inspection program.

Permanent or other exemptions from the surveillance program for individual snubbers may be granted by the Commission if a justifiable basis for exemption is presented and, if applicable, snubber life destructive testing was performed to qualify the snubbers for the applicable design conditions at either the completion of their fabrication or at a subsequent date. Snubbers so exempted shall be listed in the list of individual snubbers indicating the extent of the exemptions.

The service life of a snubber is established via manufacturer input and information through consideration of the snubber service conditions and associated installation and maintenance records (newly installed snubbers, seal replaced, spring replaced, in high radiation area, in high temperature area, etc.). The requirement to monitor the snubber service life is included to ensure that the snubbers periodically undergo a performance evaluation in view of their age and operating conditions. These records will provide statistical bases for future consideration of snubber service life.

3/4.8.1 AC SOURCES (Continued)

LIMITING CONDITION FOR OPERATION (LCO) (continued)

APPLICABILITY

The AC sources are required to be OPERABLE in MODES 1, 2, 3, and 4 to ensure that:

a. Acceptable fuel design limits and reactor coolant pressure boundary limits are not exceeded as a result of AOOs or abnormal transients and

b. Adequate core cooling is provided and containment OPERABILITY and other vital functions are maintained in the event of a postulated DBA.

The AC power requirements for MODES 5 and 6 are covered in LCO 3/4.8.2, "AC Sources – Shutdown."

ACTIONS

A Note prohibits the application of LCO 3.0.4.b to an inoperable DG. There is an increased risk associated with entering a MODE or other specified condition in the Applicability with an inoperable DG and the provisions of LCO 3.0.4.b, which allow entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, should not be applied in this circumstance.

For all of the following ACTIONs, if the inoperable AC electric power sources cannot be restored to OPERABLE status within the required AOT, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least HOT STANDBY within 6 hours and to COLD SHUTDOWN within the following 30 hours.