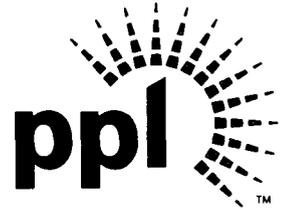


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JUL 31 2008

U. S. Nuclear Regulatory Commission
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Washington, DC 20555

**SUSQUEHANNA STEAM ELECTRIC STATION,
AMENDMENT REQUEST NO. 303 TO LICENSE NPF-14 AND
AMENDMENT REQUEST NO. 273 TO LICENSE NPF-22:
TECHNICAL SPECIFICATION CHANGE TO TECHNICAL
SPECIFICATION 3.6.1.3 TO INCREASE THE MAXIMUM
ALLOWABLE SECONDARY CONTAINMENT BYPASS
LEAKAGE LIMIT
PLA-6392**

**Docket Nos. 50-387
and 50-388**

Pursuant to 10 CFR 50.90, PPL Susquehanna, LLC (PPL), hereby requests approval of the following proposed amendments to the Susquehanna Steam Electric Station (SSES) Unit 1 and Unit 2 Technical Specifications (TS), as described in the Enclosure. The proposed amendments would change Technical Specification 3.6.1.3 "Primary Containment Isolation Valves (PCIVs)." Specifically, the proposed amendments will raise the allowable Secondary Containment Bypass Leakage (SCBL) to less than or equal to 15 scfh when pressurized to greater than or equal to P_a .

The change is proposed in order to reduce an unnecessarily restrictive Surveillance Requirement. The proposed change will not impact the reliability of the SCBL pathway valves or adversely impact their ability to perform their design basis function. This change will preclude unnecessary valve repairs and reduce dose to maintenance personnel. These changes will allow PPL's manpower resources to be focused on more safety significant activities during station outages.

Justification for the change to the Unit 1 and Unit 2 Primary Containment Isolation Valve Surveillance Requirement 3.6.1.3.11 is based upon the evaluation presented in the Enclosure. As demonstrated in the enclosed evaluation, the proposed amendment does not involve a significant hazard consideration and offsite and control room doses remain within 10 CFR 50.67 limits.

PPL requests approval of the proposed change to the Unit 1 and Unit 2 Technical Specifications by April 1, 2009. This will allow PPL to implement the changes in the upcoming Unit 2 Refueling and Inspection outage. PPL further requests that the approved

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amendment be issued to be effective immediately upon approval with the implementation to be completed within 30 days.

Attachment 1 contains the Technical Specification mark-ups reflecting the proposed change. There are no changes to the Technical Specification Bases.

This change has been discussed with the SSES NRC Project Manager. The change is similar to a change approved by the NRC for Detroit Edison's Fermi 2 station (ML053470004). The change has also been reviewed by the SSES Plant Operations Review Committee and by the Susquehanna Review Committee. In accordance with 10 CFR 50.91(b), PPL Susquehanna, LLC is providing the Commonwealth of Pennsylvania with a copy of this proposed License Amendment request.

There are no regulatory commitments associated with the proposed changes.

If you have any questions or require additional information, please contact Mr. C. T. Coddington at 610-774-4019.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 7.31.08



B. T. McKinney

Enclosure:

PPL Susquehanna, LLC Evaluation of Proposed Change to the Unit 1 and Unit 2 TS 3.6.1.3 "Primary Containment Isolation Valves (PCIVs)"

Attachments:

- Attachment 1 Proposed Technical Specification Changes Unit 1 and Unit 2 (Mark-ups)
- Attachment 2 CD of Calculation EC-RADN-1125, Revision 3 "CRHE and Off Site Post LOCA Doses - AST" and Calculation EC-RADN-1129, Revision 2 "DBA-LOCA Total Control Room Dose"

Copy: NRC Region I
Mr. R. R. Janati, DEP/BRP
Mr. F. W. Jaxheimer, NRC Sr. Resident Inspector
Mr. B. K. Vaidya, NRC Project Manager

Enclosure to PLA-6392

PPL Susquehanna, LLC

Evaluation of Proposed Change to the Unit 1 and Unit 2 TS 3.6.1.3 “Primary Containment Isolation Valves (PCIVs)”

1. DESCRIPTION
2. PROPOSED CHANGE
3. BACKGROUND
4. TECHNICAL ANALYSIS
5. REGULATORY SAFETY ANALYSIS
 - 5.1 No Significant Hazards Consideration
 - 5.2 Applicable Regulatory Requirements/Criteria
6. ENVIRONMENTAL CONSIDERATIONS
7. REFERENCES

PPL EVALUATION

Subject: PPL Susquehanna, LLC Evaluation of Proposed Change to the Unit 1 and Unit 2 Technical Specification 3.6.1.3 Primary Containment Isolation Valves (PCIVs)

1. DESCRIPTION

The change to the PPL Susquehanna, LLC (PPL) Unit 1 and Unit 2 Technical Specification 3.6.1.3 "Primary Containment Isolation Valves (PCIVs)" proposes a new Secondary Containment Bypass Leakage (SCBL) limit (Surveillance Requirement 3.6.1.3.11). The current SCBL limit is less than or equal to 9 scfh when pressurized to greater than or equal to P_a . The proposed change will increase the limit to less than or equal to 15 scfh when pressurized to greater than or equal to P_a .

If approved, PPL plans to implement the proposed Unit 1 and Unit 2 TS amendments in April 2009.

Mark-ups of the proposed change to the Unit 1 and Unit 2 Technical Specifications (TS) are included in Attachment 1 of this submittal.

2. PROPOSED CHANGE

The proposed technical change to the Unit 1 and Unit 2 Technical Specifications 3.6.1.3 (Surveillance Requirement 3.6.1.3.11) is as follows (change is bolded):

*Verify the combined leakage rate for all secondary containment bypass leakage paths is **≤ 15 scfh** when pressurized to **$\geq P_a$** .*

The change is proposed in order to reduce an unnecessarily restrictive Surveillance Requirement. The proposed change will not impact the reliability of the SCBL pathway valves or adversely impact their ability to perform their design basis function. The SCBL pathway valves are required to meet PPL established leakage rate limits based on valve type and size so to ensure acceptable valve performance. These limits are not being changed. This change will preclude unnecessary valve repairs and reduce dose to maintenance personnel (on average 0.2 rem - 0.5 rem per outage). These changes will allow PPL's manpower resources to be focused on more safety significant activities during station outages.

No changes are required to the TS Bases Sections B 3.6.1.3.

3. BACKGROUND

The current SSES DBA LOCA offsite and control room dose consequence analysis is presented in FSAR Section 15.6. This analysis is based on the source term and modeling assumptions presented in Regulatory Guide 1.183 "Alternative Radiological Source Terms for Evaluating Design Basis Accidents at Nuclear Power Reactors." The PPL DBA LOCA dose model was recently approved by the NRC in letter dated January 31, 2007 "Issuance of Amendment RE: Implementation of Alternative Radiological Source Term" (ML070080301) and May 10, 2007 (contains editorial corrections to the January 31, 2007 letter, ML071270053).

Secondary Containment Bypass Leakage (SCBL) is discussed in SSES FSAR Section 6.2.3. SCBL is defined as leakage from primary containment, which can bypass the leakage collection/filtration systems of secondary containment and escape directly to the environment. Similarly, a potential SCBL pathway is defined as any process line that penetrates both primary and secondary containment, or a process line that penetrates primary containment only, with a branch line connection that penetrates secondary containment. Consequently, a valid SCBL pathway is any process line or branch line that penetrates both primary and secondary containment, which does not contain a barrier that eliminates leakage from being released directly to the environment. SSES contains numerous SCBL pathways. The leakage barriers in those lines are periodically tested in a manner consistent with the guidance provided for performing 10CFR50, Appendix J Type B or C tests. The total combined leakage from all valid SCBL pathways is maintained less than or equal to the value specified for SCBL in the Technical Specifications. Note that the SCBL leakage is only a dose contributor to the DBA LOCA. The proposed change will increase this value to be less than or equal to 15 scfh when pressurized to greater than or equal to P_a . The proposed SCBL limit is consistent with previously NRC approved SCBL limits at Fermi (29.6 scfh). Note that the primary containment to secondary containment leakage is also adjusted in the analysis since the design leakage rate of 1% per day is adjusted to exclude SCBL.

The atmospheric dispersion (χ/Q) values calculated for the Control Room Habitability Envelope (CRHE) air intake provided in the October 13, 2005 submittal (PLA-5963, ML060120353) were based upon an assumption that the CRHE intake is located near the southeast corner at the top of the Unit 2 Reactor Building. The enclosure to the November 14, 2006 letter (PLA-6124, ML063310433) provided revised χ/Q values for the as-built location of the CRHE air intake on the south wall of the Unit 2 Reactor Building. The NRC letter dated January 31, 2007 (ML070080301) approved the χ/Q values for the as-built location. This submittal uses the χ/Q values for the as-built location of the CRHE air intake on the south wall of the Unit 2 Reactor Building. These values are provided in Table 4.3-1 (below) and are the same values that appear in the January 31, 2007 (ML070080301) NRC letter in Table 2.

4. TECHNICAL ANALYSIS

The DBA LOCA dose analysis submitted in the October 13, 2005 submittal (PLA-5963, ML060120353) has been revised. The following changes have been made:

1. Secondary Containment Bypass Leakage was changed from 9 scfh to 15 scfh.
2. Primary Containment to Secondary Containment leakage has been changed from 0.9866%/day to 0.9777%/day to maintain total primary containment leakage at 1%/day.
3. The Control Room atmospheric dispersion (χ/Q) values that appear in the NRC letter dated January 31, 2007 (ML070080301), based on the as-built intake location, are used.

The analysis results show that 10 CFR 50.67 limits will not be exceeded. The dose analyses are presented in Attachments 2. Each of these changes is discussed in detail below.

4.1. Secondary Containment Bypass Leakage Limit

Secondary Containment Bypass Leakage (SCBL) is a leakage pathway that is modeled in the DBA LOCA dose analysis. The SCBL is modeled as a ground level release from primary containment directly to the environment taking credit for mixing in the drywell volume for the first two hours of the accident and in the combined drywell and wetwell volumes for the remainder of the accident. SCBL leakage pathways are not a dose contributor for the other limiting radiological release events (Main Steam Line Break outside of Primary Containment, Fuel/Equipment Handling Accident or the Control Rod Drop Accident). Therefore, only the DBA LOCA dose analysis is impacted by an increase in the SCBL limit. The current SCBL limit of 9 scfh when pressurized to greater than or equal to P_a is very restrictive since numerous SCBL pathways exist at SSES. The proposed change will increase the SCBL value to 15 scfh (7079 sccm) when pressurized to greater than or equal to P_a . As done in the previous PPL AST submittal dated October 13, 2005 (PLA-5963, ML060120353), this value can be converted to percent/day by dividing the SCBL limit by the primary containment 1%/day leakage limit (317907 sccm). This yields a leakage rate of 0.0223%/day. This value is reduced by 50% at 24 hours post-LOCA as was done in the approved AST analysis (NRC letter dated January 31, 2007, ML070080301). Note that the dose analysis is conservative with respect to estimating the dose contribution due to SCBL since delay time and deposition in the pipe are neglected.

4.2 Primary Containment to Secondary Containment Leakage

The SCBL is subtracted from the total Primary Containment leakage to obtain the Primary Containment to Secondary Containment Leakage. Since the SCBL value used in the analysis increased, the Primary to Secondary Containment leakage pathway was

decreased to maintain the Primary Containment leakage at $1.0 L_a$ which is the current design limit. This is the same approach as was used previously in the NRC approved PPL AST submittal dated October 13, 2005 (PLA-5963, ML060120353).

4.3 Control Room Habitability Envelope (CRHE) Air Intake χ/Q Values

The atmospheric dispersion (χ/Q) values for the as-built CRHE Air Intake location were provided to the NRC in PPL letter dated November 14, 2006 (ML063310433). The NRC approved the as-built CRHE Air Intake atmospheric dispersion values for use in section 3.2.4 of their January 31, 2007 letter (ML070080301). The use of the as-built control room CRHE intake dispersion values instead of the original control room CRHE intake design location dispersion values provide the margin to increase the SCBL limit. The CRHE Air Intake atmospheric dispersion values that are used in the analysis are provided in Table 4.3-1.

Table 4.3-1: CRHE Air Intake – χ/Q (sec / m³)⁽¹⁾

Release Point	CRHE χ/Q 's (sec/m ³) without Occupancy Correction Factors				
	0 to 2 hours	2 to 8 hours	8 to 24 hours	1 to 4 days	4 to 30 days
TB Unit 1 Exhaust Vent	1.09E-03	8.01E-04	2.89E-04	1.72E-04	1.50E-04
TB Unit 2 Exhaust Vent	1.21E-03	8.76E-04	3.16E-04	1.92E-04	1.61E-04
SGTS Exhaust Vent	1.16E-03	8.64E-04	3.09E-04	1.87E-04	1.60E-04

Note 1: For the LOCA, the primary containment and ESF leakages to the secondary containment are released to the environment via the SGTS vent. The primary containment bypass and MSIV leakages are released to the environment via the Turbine Building exhaust vent. Figure 1 depicts the analysis release paths and release rates used in the analysis.

4.4 Resultant Dose Consequences

The resultant dose consequences for the DBA LOCA are presented in Table 4.4-1. The Control Room dose is essentially the same as the value submitted in the October 13, 2005 submittal. Note that the control room dose bounds the Technical Support Center (TSC) dose (see Attachment 2). All doses are below the applicable regulatory value (10 CFR 50.67).

Table 4.4-1: DBA LOCA Dose Consequences

Parameter	Previous SSES DBA LOCA dose (SCBL limit 9 scfh) (rem TEDE)	SSES DBA LOCA Dose for SCBL limit of 15 scfh (rem TEDE)	Regulatory Limit (10CFR 50.67) (rem TEDE)
EAB (Worst Case 2 hour)	8.4	10.7	25
LPZ (30 day)	3.8	4.2	25
Control Room (30 day)	4.8	4.8	5

5. REGULATORY SAFETY ANALYSIS

5.1 No Significant Hazards Consideration

Amendments are proposed to the PPL Susquehanna, LLC (PPL) Unit 1 and Unit 2 Technical Specification 3.6.1.3 “Primary Containment Isolation Valves (PCIVs)” that will change the Secondary Containment Bypass Leakage limit (SR 3.6.1.3.11) from less than or equal to 9 scfh to less than or equal to 15 scfh while pressurized to greater than or equal to P_a .

PPL Susquehanna, LLC (PPL) has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, “Issuance of amendment,” as discussed below:

1. Do the proposed changes involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The structures, systems and components affected by the proposed change act as mitigators to the consequences of accidents. These components are not initiators of any accident analyzed in the Final Safety Analysis Report (FSAR). As such, the proposed change does not increase the probability of an accident previously evaluated. Based on the revised analysis, the proposed change does revise the performance requirement; however, the proposed change does not involve a revision to the parameters or conditions that could contribute to the initiation of a DBA discussed in Chapter 15 of the FSAR.

Plant-specific radiological analysis has been performed using the increased Secondary Containment Bypass Leakage (SCBL) limit. This analysis demonstrates that the CRHE dose consequences meet the regulatory guidance provided for use with the Alternative Source Term (AST), and the offsite doses are well within acceptable limits (10 CFR 50.67, Regulatory Guide (RG) 1.183, and Standard Review Plan Section (SRP) 15.0.1).

Therefore, the proposed amendment does not result in a significant increase in the consequences of any previously evaluated accident

2. Do the proposed changes create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed change does not involve a physical alteration of any plant equipment. No new equipment is being introduced, and installed equipment is not being operated in a new or different manner. There are no setpoints, at which protective or mitigative actions are initiated, affected by this change. This change does not alter the manner in which equipment operation is initiated, nor will the function demands on credited equipment be changed. No alterations in the procedures that ensure the plant remains within analyzed limits are being proposed, and no changes are being made to the procedures relied upon to respond to an off-normal event as described in the FSAR. As such, no new failure modes are being introduced. The change does not alter assumptions made in the safety analysis and licensing basis.

Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

3. Do the proposed changes involve a significant reduction in a margin of safety?

Response: No

The results of the revised accident analysis are subject to the acceptance criteria in 10 CFR 50.67. The revised Secondary Containment Bypass Leakage rate limit is used in the LOCA radiological analysis. The analysis has been performed using conservative methodologies. Safety margins and analytical conservatisms have been evaluated and have been found acceptable. The analyzed LOCA event has been carefully selected and margin has been retained to ensure that the analysis adequately bounds postulated event scenarios. The dose consequences of the limiting event is within the acceptance criteria presented in 10 CFR 50.67, RG 1.183, and SRP 15.0.1. The effect of the revision to the Technical Specification requirements has been analyzed and doses resulting from the pertinent design basis accident have been found to remain within regulatory limits. The change continues to ensure that the doses at the exclusion area and low population zone boundaries, as well as the control room, are within the corresponding regulatory limits. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, PPL concludes that the proposed change does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and accordingly, a finding of no significant hazards consideration is justified.

5.2 Applicable Regulatory Requirements/Criteria

SSES FSAR Sections 3.1 and 3.13 provide detailed discussion of SSES compliance with the applicable regulatory requirements and guidance.

The proposed TS amendments:

- (a) Do not alter the design or function of any system;
- (b) Do not result in any change in the qualifications of any component; and
- (c) Do not result in the reclassification of any component's status in the areas of shared, safety-related, independent, redundant, and physically or electrically separated.

5.2.1 General Design Criteria

The following applicable General Design Criteria (GDC) for the primary containment require that the primary containment be designed and maintained so that offsite doses remain below the regulatory guidelines and the containment penetrations can be isolated and tested:

GDC 16 – Containment Design

The proposed change will maintain offsite and control room doses below regulatory limits. The proposed change will maintain the Primary Containment as an essentially leak tight barrier against the uncontrolled release of radioactivity to the environment since the overall Primary Containment leak rate (1%/day) is not changing.

GDC 50 – Containment Design Basis

The proposed change does not change the containment design pressure or temperature to any postulated loss of coolant accident. Additionally, the proposed change does not alter the total containment leak rate of 1.0%/day for any postulated loss of coolant accident. Based on this information, the proposed change does not impact the commitment to this GDC.

GDC 54 – Piping Systems Penetrating Primary Containment

The proposed change does not impact the isolation capability of primary containment penetrations. Additionally, SCBL penetrations will continue to be leak rate tested and the leakage will be within the TS values. Therefore, the proposed change does not impact this commitment.

GDC 55 – Reactor Coolant Pressure Boundary Penetrating ContainmentGDC 56 – Primary Containment Isolation

The proposed change does not impact the isolation capability or valve arrangement of pipes penetrating primary containment. Additionally, SCBL penetrations will continue to be isolated in accordance with the appropriate regulations. Therefore, the proposed change has no impact on these commitments.

5.2.2 Applicable Regulatory Guides

The following applicable Regulatory Guides are for the primary containment and the offsite and control room dose calculations:

Regulatory Guide 1.163:

Regulatory Guide 1.163 is titled “Performance Based Containment Leak Rate Test Program.” The proposed change will not change the testing frequency or the testing method for primary containment penetrations. Therefore, the proposed change does not impact this regulatory commitment.

Regulatory Guides 1.145, 1.183 and 1.194:

Regulatory Guide 1.145 is titled “Atmospheric Dispersion Models for Potential Accident Consequence Assessment at Nuclear Power Plants,” Regulatory Guide 1.183 is titled “Alternative Radiological Source Terms for Evaluating Design Basis Activities at Nuclear Power Reactors” and Regulatory Guide 1.194 is titled “Atmospheric Relative Concentrations for Control Room Radiological Assessments at Nuclear Power Plants.” The dose analysis and atmospheric dispersion values were calculated using the guidance presented in these Regulatory Guides as described in PPL’s AST submittal dated October 13, 2005 and approved by the NRC in SER dated January 31, 2007.

Conformance with GDC 16, 50, 54, 55, and 56, as well as conformance with Regulatory Guides 1.163, 1.145, 1.183 and 1.194 are not affected by these proposed changes.

Thus, the proposed changes do not change the conformance with the above General Design Criteria and regulatory guidance.

Conclusion

Based on the analysis provided in Section 4.0: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission’s regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

6. ENVIRONMENTAL CONSIDERATION

10 CFR 51.22(c)(9) identifies certain licensing and regulatory actions, which are eligible for categorical exclusion from the requirement to perform an environmental assessment. A proposed amendment to an operating license for a facility does not require an environmental assessment if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant hazards consideration; (2) result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite; or (3) result in a significant increase in individual or cumulative occupational radiation exposure. PPL Susquehanna, LLC has evaluated the proposed change and has determined that the proposed change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Accordingly, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with issuance of the amendment. The basis for this determination, using the above criteria, follows:

Basis

As demonstrated in the “No Significant Hazards Consideration” evaluation, the proposed amendment does not involve a significant hazards consideration.

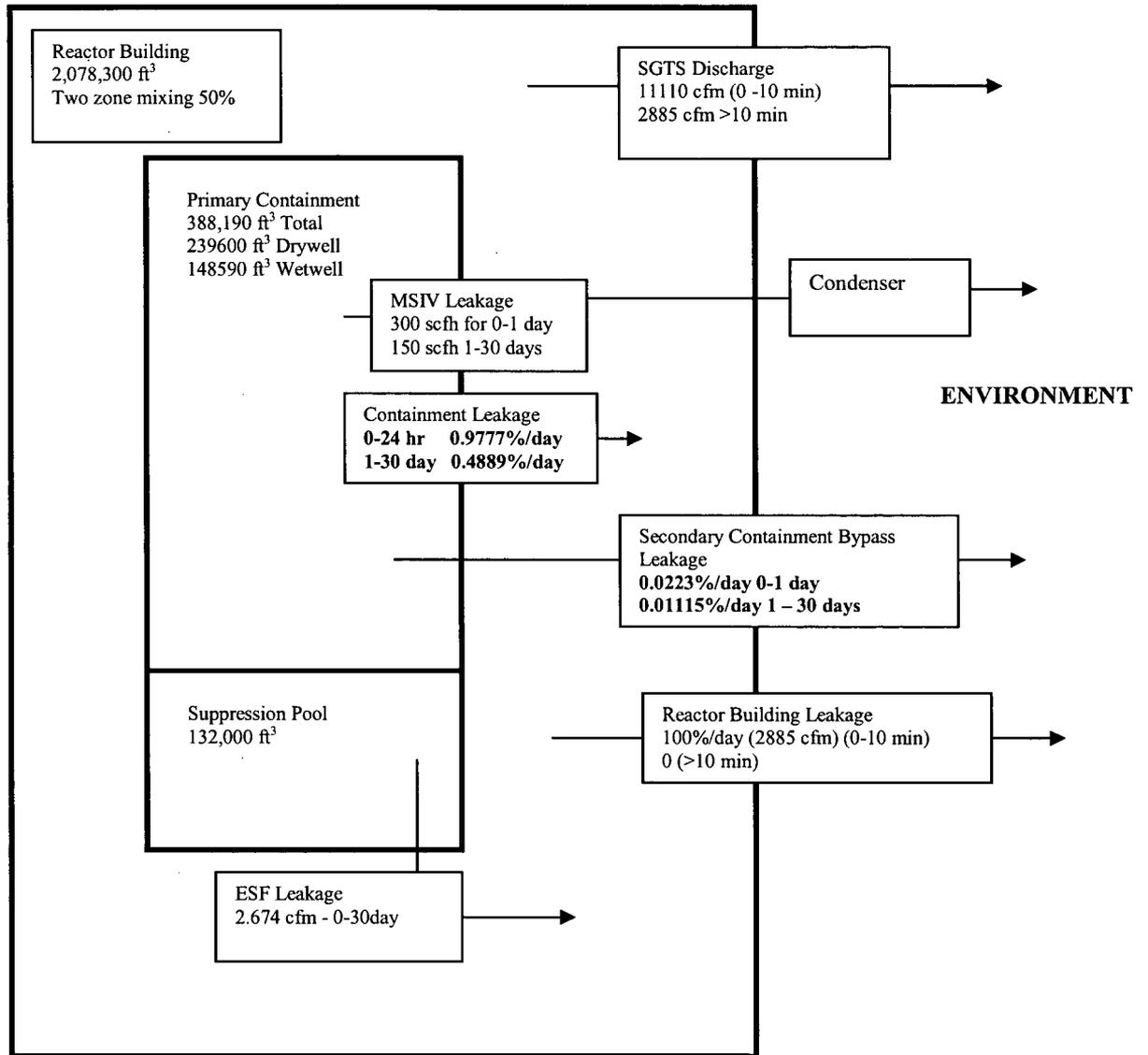
There is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite. The proposed change does not involve any physical alteration of the plant (no new or different type of equipment will be installed) or change in methods governing normal plant operation.

There is no significant increase in individual or cumulative occupational radiation exposure. The proposed change does not involve any physical alteration of the plant (no new or different type of equipment will be installed) or change in methods governing normal plant operation.

7. REFERENCES

1. PLA-5963, Mr. B. T. McKinney (PPL) to Document Control Desk (USNRC) Proposed Amendment No. 281 to License NPF-14 and Proposed Amendment No. 251 to License NPF-22: “Application for License Amendment and Related Technical Specification Changes to Implement Full-Scope Alternative Source Term in Accordance with 10 CFR 50.67,” dated October 13, 2005.
2. PLA-6124, Mr. B. T. McKinney (PPL) to Document Control Desk (USNRC) Proposed Amendment No. 281 to License NPF-14 and Proposed Amendment No. 251 to License NPF-22: “Application for License Amendment and Related Technical Specification Changes to Implement Full-Scope Alternative Source Term in Accordance with 10 CFR 50.67 – Response to request for Additional Information,” dated November 14, 2006.
3. Letter, Mr. R. V. Guzman (USNRC) to Mr. B. T. McKinney (PPL) titled “Susquehanna Steam Electric Station, Units 1 and 2 – Issuance of Amendment Re: Implementation of Alternative Radiological Source Term (TAC. Nos. MC8730 and MC8731).”
4. Letter, Mr. R. V. Guzman (USNRC) to Mr. B. T. McKinney (PPL) titled “Susquehanna Steam Electric Station, Units 1 and 2 – Correction to Amendment Nos. 239 and 216 (TAC Nos. MC8730 and MC8731).”

Figure 1



Note: Only the bolded values are changed by this proposed change.

Attachment 1 to PLA-6392

Proposed Technical Specification Changes

Units 1 & 2

(Mark-ups)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.6.1.3.10	Remove and test the explosive squib from each shear isolation valve of the TIP System.	24 months on a STAGGERED TEST BASIS
SR 3.6.1.3.11	<p>-----NOTES----- Only required to be met in MODES 1, 2, and 3. -----</p> <p>Verify the combined leakage rate for all secondary containment bypass leakage paths is ≤ 915 scfh when pressurized to $\geq P_a$.</p>	In accordance with the Primary Containment Leakage Rate Testing Program.
SR 3.6.1.3.12	<p>-----NOTES----- Only required to be met in MODES 1, 2, and 3. -----</p> <p>Verify leakage rate through each MSIV is ≤ 100 scfh and ≤ 300 scfh for the combined leakage including the leakage from the MS Line Drains, when the MSIVs are tested at ≥ 24.3 psig or P_a and the MS Line Drains are tested at P_a.</p>	In accordance with the Primary Containment Leakage Rate Testing Program.

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.6.1.3.11	<p>-----NOTES----- Only required to be met in MODES 1, 2, and 3. -----</p> <p>Verify the combined leakage rate for all secondary containment bypass leakage paths is ≤ 915 scfh when pressurized to $\geq P_a$.</p>	In accordance with the Primary Containment Leakage Rate Testing Program.
SR 3.6.1.3.12	<p>-----NOTES----- Only required to be met in MODES 1, 2, and 3. -----</p> <p>Verify leakage rate through each MSIV is ≤ 100 scfh and ≤ 300 scfh for the combined leakage including the leakage from the MS Line Drains when the MSIVs are tested at ≥ 22.5 psig or P_a and the MS Line Drains are tested at P_a.</p>	In accordance with the Primary Containment Leakage Rate Testing Program.

(continued)

Attachment 2 to PLA-6392

**CD of Calculation EC-RADN-1125, Revision 3
“CRHE and Off Site Post LOCA Doses – AST”
and
Calculation EC-RADN-1129, Revision 2
“DBA-LOCA Total Control Room Dose”**
