

Attachment 2
Revisions to TS and Bases Markups

Containment Spray and Cooling Systems (Atmospheric and Dual)
3.6.6A

3.6 CONTAINMENT SYSTEMS

3.6.6A Containment Spray and Cooling Systems (Atmospheric and Dual) (Credit taken for iodine removal by the Containment Spray System)

LCO 3.6.6A Two containment spray trains and [two] containment cooling trains shall be OPERABLE.

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

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One containment spray train inoperable.	A.1 Restore containment spray train to OPERABLE status.	72 hours <u>AND</u> 10 days from discovery of failure to meet the LCO
<div style="border: 1px solid black; padding: 5px; width: fit-content;"> <p style="text-align: center;">-----NOTE-----</p> <p>LCO 3.0.4.a is not applicable when entering MODE 4, from MODE 5.</p> </div>		
B. Required Action and associated Completion Time of Condition A not met.	B.1 Be in MODE 3.	6 hours
	<u>AND</u> B.2 Be in MODE 3 ⁴ .	84 ⁵⁴ hours
C. One [required] containment cooling train inoperable.	C.1 Restore [required] containment cooling train to OPERABLE status.	7 days <u>AND</u> 10 days from discovery of failure to meet the LCO
D. Two [required] containment cooling trains inoperable.	D.1 Restore one [required] containment cooling train to OPERABLE status.	72 hours

Containment Spray System (Ice Condenser)
3.6.6C

3.6 CONTAINMENT SYSTEMS

3.6.6C Containment Spray System (Ice Condenser)

LCO 3.6.6C Two containment spray trains shall be OPERABLE.

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

-----NOTE-----
LCO 3.0.4.a is not applicable when entering MODE 4 from ~~MODE 5~~.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One containment spray train inoperable.	A.1 Restore containment spray train to OPERABLE status.	72 hours
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	6 hours
	<u>AND</u> B.2 Be in MODE 5.	84 54 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.6.6C.1 Verify each containment spray manual, power operated, and automatic valve in the flow path that is not locked, sealed, or otherwise secured in position is in the correct position.	31 days
SR 3.6.6C.2 Verify each containment spray pump's developed head at the flow test point is greater than or equal to the required developed head.	In accordance with the Inservice Testing Program

3.6 CONTAINMENT SYSTEMS

3.6.6E Recirculation Spray (RS) System (Subatmospheric)

LCO 3.6.6E Four RS subsystems [and a casing cooling tank] shall be OPERABLE.

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

-----NOTE-----
LCO 3.0.4.a is not applicable when entering MODE 4 from MODE 5.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One RS subsystem inoperable.	A.1 Restore RS subsystem to OPERABLE status.	7 days
B. Two RS subsystems inoperable in one train.	B.1 Restore one RS subsystem to OPERABLE status.	72 hours
C. [Two inside RS subsystems inoperable.	C.1 Restore one RS subsystem to OPERABLE status.	72 hours]
D. [Two outside RS subsystems inoperable.	D.1 Restore one RS subsystem to OPERABLE status.	72 hours]
E. [Casing cooling tank inoperable.	E.1 Restore casing cooling tank to OPERABLE status.	72 hours]
F. Required Action and associated Completion Time not met.	F.1 Be in MODE 3.	6 hours
	<u>AND</u> F.2 Be in MODE 4.	54 84 hours
G. Three or more RS subsystems inoperable.	G.1 Enter LCO 3.0.3.	Immediately

Spray Additive System (Atmospheric, Subatmospheric, Ice Condenser, and Dual)
3.6.7

3.6 CONTAINMENT SYSTEMS

3.6.7 Spray Additive System (Atmospheric, Subatmospheric, Ice Condenser, and Dual)

LCO 3.6.7 The Spray Additive System shall be OPERABLE.

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

NOTE
LCO 3.0.4.a is not applicable when entering MODE 4 from MODE 5.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Spray Additive System inoperable.	A.1 Restore Spray Additive System to OPERABLE status.	72 hours
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	6 hours
	AND B.2 Be in MODE 4.	84 54 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.6.7.1 Verify each spray additive manual, power operated, and automatic valve in the flow path that is not locked, sealed, or otherwise secured in position is in the correct position.	31 days
SR 3.6.7.2 Verify spray additive tank solution volume is \geq [2568] gal and \leq [4000] gal.	184 days
SR 3.6.7.3 Verify spray additive tank [NaOH] solution concentration is \geq [30]% and \leq [32]% by weight.	184 days

BASES

ACTIONS (continued)

The 10 day portion of the Completion Time for Required Action A.1 is based upon engineering judgment. It takes into account the low probability of coincident entry into two Conditions in this Specification coupled with the low probability of an accident occurring during this time. Refer to Section 1.3, "Completion Times," for a more detailed discussion of the purpose of the "from discovery of failure to meet the LCO" portion of the Completion Time.

B.1 and B.2

If the inoperable containment spray train cannot be restored to OPERABLE status within the required Completion Time, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 5 within 24 hours. The allowed Completion Time of 6 hours is reasonable, based on operating experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging plant systems. The extended interval to reach MODE 5 allows additional time for attempting restoration of the containment spray train and is reasonable when considering the driving force for a release of radioactive material from the Reactor Coolant System is reduced in MODE 3.

TO OPERABLE
FROM IN MODE 3.

Insert 1

4

48 hours to restore

54
60

4

Insert 3A

Insert 2
This

C.1

With one of the required containment cooling trains inoperable, the inoperable required containment cooling train must be restored to OPERABLE status within 7 days. The components in this degraded condition provide iodine removal capabilities and are capable of providing at least 100% of the heat removal needs. The 7 day Completion Time was developed taking into account the redundant heat removal capabilities afforded by combinations of the Containment Spray System and Containment Cooling System and the low probability of DBA occurring during this period.

The 10 day portion of the Completion Time for Required Action C.1 is based upon engineering judgment. It takes into account the low probability of coincident entry into two Conditions in this Specification coupled with the low probability of an accident occurring during this time. Refer to Section 1.3 for a more detailed discussion of the purpose of the "from discovery of failure to meet the LCO" portion of the Completion Time.

BASES

APPLICABILITY In MODES 1, 2, 3, and 4, a DBA could cause a release of radioactive material to containment and an increase in containment pressure and temperature requiring the operation of the Containment Spray System.

In MODES 5 and 6, the probability and consequences of these events are reduced because of the pressure and temperature limitations of these MODES. Thus, the Containment Spray System is not required to be OPERABLE in MODE 5 or 6.

ACTIONS

A.1

With one containment spray train inoperable, the affected train must be restored to OPERABLE status within 72 hours. The components in this degraded condition are capable of providing 100% of the heat removal and iodine removal needs after an accident. The 72 hour Completion Time was developed taking into account the redundant heat removal and iodine removal capabilities afforded by the OPERABLE train and the low probability of a DBA occurring during this period.

B.1 and B.2

If the affected containment spray train cannot be restored to OPERABLE status within the required Completion Time, the plant must be brought to a MODE in which the ~~CC does not apply~~. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 5/4 within 84 hours. 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. The extended interval to reach MODE 5 allows additional time and is reasonable when considering that the driving force for a release of radioactive material from the Reactor Coolant System is reduced in MODE 3. Insert 2

Insert 13

*60
54*

THIS

Insert 3A

SURVEILLANCE REQUIREMENTS

SR 3.6.6C.1

Verifying the correct alignment of manual, power operated, and automatic valves, excluding check valves, in the Containment Spray System provides assurance that the proper flow path exists for Containment Spray System operation. This SR does not apply to valves that are locked, sealed, or otherwise secured in position since they were verified in the correct position prior to being secured. This SR does not require any testing or valve manipulation. Rather, it involves verification that those valves outside containment and capable of potentially being mispositioned, are in the correct position.

48 hours to restore the containment spray train to

OPERABLE status in MODE 3.

BASES

ACTIONS (continued)

[C.1

With two inside RS subsystems inoperable, at least one of the inoperable subsystems must be restored to OPERABLE status within 72 hours. The components in this degraded condition are capable of providing 100% of the heat removal needs after an accident. The 72 hour Completion Time was chosen based on the same reasons as given in Required Action B.1.]

[D.1

With two outside RS subsystems inoperable, at least one of the inoperable subsystems must be restored to OPERABLE status within 72 hours. The components in this degraded condition are capable of providing 100% of the heat removal needs after an accident. The 72 hour Completion Time was chosen based on the same reasons as given in Required Action B.1.]

[E.1

With the casing cooling tank inoperable, the NPSH available to the outside RS subsystem pumps may not be sufficient. The inoperable casing cooling tank must be restored to OPERABLE status within 72 hours. The components in this degraded condition are capable of providing 100% of the heat removal needs after an accident. The 72 hour Completion Time was chosen based on the same reasons as given in Required Action B.1.]

F.1 and F.2

If the inoperable RS subsystem(s) [or the casing cooling tank] cannot be restored to OPERABLE status within the required Completion Time, the plant must be brought to a MODE in which they ~~CO does not apply~~. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 5 within 84 hours. The allowed Completion Time of 6 hours is reasonable, based on operating experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging plant systems. The extended interval to reach MODE 5 allows additional time and is reasonable considering that the driving force for a release of radioactive material from the Reactor Coolant System is reduced in MODE 3.

Insert 9

4

54

00

THIS

Insert 3

Insert 2

48 hours to restore the RS subsystem(s) [or casing cooling tank] to OPERABLE status in MODE 3.

BASES

LCO (continued)

spray flow until the Containment Spray System suction path is switched from the RWST to the containment sump, and to raise the average spray solution pH to a level conducive to iodine removal, namely, to between [7.2 and 11.0]. This pH range maximizes the effectiveness of the iodine removal mechanism without introducing conditions that may induce caustic stress corrosion cracking of mechanical system components. In addition, it is essential that valves in the Spray Additive System flow paths are properly positioned and that automatic valves are capable of activating to their correct positions.

APPLICABILITY

In MODES 1, 2, 3, and 4, a DBA could cause a release of radioactive material to containment requiring the operation of the Spray Additive System. The Spray Additive System assists in reducing the iodine fission product inventory prior to release to the environment.

In MODES 5 and 6, the probability and consequences of these events are reduced due to the pressure and temperature limitations in these MODES. Thus, the Spray Additive System is not required to be OPERABLE in MODE 5 or 6.

ACTIONS

A.1

If the Spray Additive System is inoperable, it must be restored to OPERABLE within 72 hours. The pH adjustment of the Containment Spray System flow for corrosion protection and iodine removal enhancement is reduced in this condition. The Containment Spray System would still be available and would remove some iodine from the containment atmosphere in the event of a DBA. The 72 hour Completion Time takes into account the redundant flow path capabilities and the low probability of the worst case DBA occurring during this period.

B.1 and B.2

If the Spray Additive System cannot be restored to OPERABLE status within the required Completion Time, the plant must be brought to a MODE in which the ~~LCO does not apply~~. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 5 within 4 hours. The allowed Completion Time of 6 hours is reasonable, based on operating experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging plant systems. The extended interval to reach MODE 5 allows 48 hours for restoration of the Spray

Insert 11

*60
54*

4

to restore

BASES

ACTIONS (continued)

NO OPERABLE STATUS
IX Additive System in MODE 3, and *36* hours to reach *MODE 8*. This is reasonable when considering the reduced pressure and temperature conditions in MODE 3 for the release of radioactive material from the Reactor Coolant System. *Insert 2*

Insert 3A

SURVEILLANCE REQUIREMENTS

SR 3.6.7.1

Verifying the correct alignment of Spray Additive System manual, power operated, and automatic valves in the spray additive flow path provides assurance that the system is able to provide additive to the Containment Spray System in the event of a DBA. This SR does not apply to valves that are locked, sealed, or otherwise secured in position, since these valves were verified to be in the correct position prior to locking, sealing, or securing. This SR does not require any testing or valve manipulation. Rather, it involves verification that those valves outside containment and capable of potentially being mispositioned are in the correct position.

SR 3.6.7.2

To provide effective iodine removal, the containment spray must be an alkaline solution. Since the RWST contents are normally acidic, the volume of the spray additive tank must provide a sufficient volume of spray additive to adjust pH for all water injected. This SR is performed to verify the availability of sufficient NaOH solution in the Spray Additive System. The 184 day Frequency was developed based on the low probability of an undetected change in tank volume occurring during the SR interval (the tank is isolated during normal unit operations). Tank level is also indicated and alarmed in the control room, so that there is high confidence that a substantial change in level would be detected.

SR 3.6.7.3

This SR provides verification of the NaOH concentration in the spray additive tank and is sufficient to ensure that the spray solution being injected into containment is at the correct pH level. The 184 day Frequency is sufficient to ensure that the concentration level of NaOH in the spray additive tank remains within the established limits. This is based on the low likelihood of an uncontrolled change in concentration (the tank is normally isolated) and the probability that any substantial variance in tank volume will be detected.