ATTACHMENT I TO IPN-93-162

PROPOSED TECHNICAL SPECIFICATION CHANGES

ASSOCIATED WITH THE

DISCONNECTION OF SECTIONS OF THE WELD CHANNEL PRESSURIZATION SYSTEM

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

a. Fan cooler unit 32, 34, or 35 or the flow path for fan cooler unit 32, 34, or 35 may be out of service for a period not to exceed 24 hours provided both containment spray pumps are operable.

OR

Fan cooler unit 31 or 33, or the flow path for fan cooler unit 31 or 33 may be out of service for a period not to exceed 7 days provided both containment spray pumps are operable.

b. One containment spray pump may be out of service for a period not to exceed 24 hours, provided the five fan cooler units are operable.

c. Any valve required for the functioning of the system during and following accident conditions may be inoperable provided it is restored to an operable status within 24 hours and all valves in the system that provide the duplicate function are operable.

3. If the Containment Cooling and Iodine Removal are not restored to meet the requirements of 3.3.B.1 within the time period specified in 3.3.B.2, then:

a. If the reactor is critical, it shall be in the hot shutdown condition within four hours and in the cold shutdown condition within the following 24 hours.

b. If the reactor is subcritical, the reactor coolant system temperature and pressure shall not be increased more than 25°F and 100 psi, respectively, over existing values. If the requirements of 3.3.B.1 are not satisfied within an additional 48 hours, the reactor shall be brought to the cold shutdown condition utilizing normal operating procedures. The shutdown shall start no later than the end of the 48 hour period.

D. Weld Channel and Penetration Pressurization System (WC & PPS)

1. The reactor shall not be brought above the cold shutdown condition unless:

   a. All required portions of the four WC & PPS zones are pressurized above 43 psig.*

   b. The uncorrected air consumption for the WC & PPS is less than or equal to 0.2% of the containment volume per day.

2. The requirements of 3.3.D.1 may be modified as follows:

   a. Any one of the four WC & PPS zones may be inoperable for a period not to exceed seven consecutive days.

   b. The uncorrected air consumption for the WC & PPS may not be in excess of 0.2% of the containment volume per day except for a period not to exceed seven consecutive days. If at any time it is determined that this limit is exceeded, repairs shall be initiated immediately.

3. If the WC & PP System is not restored to an operable status within the time period specified, then:

   a. If the reactor is critical, it shall be brought to the hot shutdown condition utilizing normal operating procedures. The shutdown shall start no later than at the end of the specified time period.

   b. If the reactor is subcritical, the reactor coolant system temperature and pressure shall not be increased more than 25°F and 100 psi, respectively, over existing values.

   c. In either case, if the WC & PP System is not restored to an operable status within an additional 48 hours, the reactor shall be brought to the cold shutdown condition utilizing normal operating procedures. The shutdown shall start no later than the end of the 48 hour period.

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* Certain portions of the Weld Channel Pressurization System have become inoperable and are not practicably accessible for repair. These portions of the Weld Channel Pressurization System have been disconnected from the system and are no longer considered required portions of the four WC & PPS zones.

3. If the Component Cooling System is not restored to meet the requirements of 3.3.E.1 within the time periods specified in 3.3.E.2, then:

   a. If the reactor is critical, it shall be in the hot shutdown condition within four hours and in the cold shutdown condition within the following 24 hours.

   b. If the reactor is subcritical, the reactor coolant system temperature and pressure shall not be increased more than 25°F and 100 psi, respectively, over existing values. If the requirements of 3.3.E.1 are not satisfied within an additional 48 hours, the reactor shall be brought to the cold shutdown condition utilizing normal operating procedures. The shutdown shall start no later than the end of the 48 hour period.

F. Service Water System/Ultimate Heat Sink

1. The reactor shall not be brought above cold shutdown unless:

   a. Three service water pumps on the designated essential header and a minimum of two service water pumps on the designated non-essential header, together with their associated piping and valves, are operable.

   b. The service water inlet temperature is less than or equal to 95°F.

2. When the reactor is above cold shutdown and if the requirements of 3.3.F.1.a cannot be met within twelve hours, the reactor shall be brought to the cold shutdown condition, starting no later than the end of the twelve hour period, utilizing normal operating procedures.

3. When the reactor is above cold shutdown and if the requirement of 3.3.F.1.b is exceeded, the reactor shall be placed in at least hot shutdown within seven hours, and in cold shutdown within the following thirty hours unless the service water inlet temperature decreases to within the requirement of 3.3.F.1.b.

Due to the distribution of the five fan cooler units and two containment spray pumps on the 480 volt buses, the closeness to which the combined equipment approaches minimum safeguards varies with which particular component is out of service. Accordingly, the allowable out of service periods vary according to which component is out of service. Under no conditions do the combined equipment degrade below minimum safeguards.

The seven day out of service period for the Weld Channel and Penetration Pressurization System and the Isolation Valve Seal Water System is consistent with W Standardized Technical Specifications. This is allowable because no credit has been taken for operation of these systems in the calculation of off-site accident doses should an accident occur. No other safeguards systems are dependent on operation of these systems.[11] The minimum pressure settings for the IVSWS and WC & PPS during operation assures effective performance of these systems for the maximum containment calculated peak accident pressure of 42.42 psig.[15] A WC & PPS zone is considered that portion of piping downstream of the air receiver discharge check valve up to the last component pressurized by that system portion.

Some portions of the Weld Channel Pressurization System (WCPS) piping would not be practicably accessible for repair if they became inoperable. A section of WCPS piping is considered to be inoperable if it brings the air consumption of the WC & PPS above the required 0.2% of the containment volume per day or if the section can not maintain a pressure above the required 43 psig. If it is determined, by written evaluation, that an inoperable section of piping is not practicably accessable for repair, then that portion of the WCPS may be disconnected from the system. Inoperable sections of WCPS piping which can be considered for disconnection will satisfy one of the following criteria: 1) the piping is covered by concrete and repairs of the piping would involve the removal of some portion of the containment structure; or 2) the piping is located behind plant equipment in the containment building and repairs of the piping would involve the relocation of the equipment. The integrity of the welds associated with any disconnected portions of the WCPS is verified by integrated leak rate testing. The provision that allows for the disconnection of portions of the WCPS piping does not apply to any other WC & PPS piping.

The Component Cooling System is not required during the injection phase of a loss-of-coolant accident. The component cooling pumps are located in the Primary Auxiliary Building and are accessible for repair after a loss-of-coolant accident.[6] During the recirculation phase following a loss-of-coolant accident, only one of the three component cooling pumps is required for minimum safeguards.[7]

A total of six service water pumps are installed. Only two of the set of three service water pumps on the header designated the essential header are required immediately following a postulated loss-of-coolant accident.[8] During the recirculation phases of the accident, two service water pumps on the non-essential header will be manually started to supply cooling water for one component cooling system heat exchanger, one control room air conditioner, and one diesel generator; the other component cooling system heat exchanger, the other control room air conditioner, the two other diesel generators and remaining safety related equipment are cooled by the essential service water header.[14]

The operability requirements on service water temperature monitoring instrumentation and the frequency of service water temperature monitoring insures that appropriate action can be taken to preclude operation beyond established limits. The locations selected for monitoring river water temperature are typically at the circulating or service water inlets, at the circulating water inlet boxes to the condenser hotwells or at the service water supply header to the fan cooler units. Temperature measurements at each of these locations are representative of the river water temperature supplied to cool plant heat loads. Alternate locations may be acceptable on this basis. The limit on the service water maximum inlet temperature insures that the service water and component cooling water systems will be able to dissipate the heat loads generated in the limiting design basis accident[15]. This restriction allows up to seven hours for river water temperature transients which may temporarily increase the service water inlet temperature due to tidal effects to dissipate.

The operability of the equipment and systems required for the control of hydrogen gas ensures that this equipment is available to maintain the hydrogen concentration within containment below the flammable limit during post-LOCA conditions. Hydrogen concentration exceeding the flammable limit could potentially result in a containment wide hydrogen burn. This could lead to overpressurization of containment, a breach of CONTAINMENT INTEGRITY, containment leakage, unacceptably high offsite doses, and damage to safety-related equipment located in containment. Two full rated recombiner units are provided in order to control the hydrogen evolved in containment following a loss-of-coolant accident. Each unit is capable of preventing the hydrogen concentration from exceeding the flammable limit. Each recombiner is installed such that independence is maintained and redundancy is assured. Each hydrogen recombiner system consists of a recombiner located inside containment, and a separate power supply, and control panel located outside containment such that they are accessible following a design basis accident.

The containment hydrogen monitoring system consists of two safety related hydrogen concentration measurement cabinets with sample lines which pass through the containment penetrations to each containment fan cooler unit plenum. Two of the five sampling lines (from containment fan cooler units nos. 32 and 35) are routed to a common source line and then to a hydrogen monitor. The other three sample lines (from containment fan cooler units nos. 31, 33 and 34) are likewise headered and routed to the other hydrogen monitor. Each monitor has a separate return line. The design hydrogen concentration for operating the recombiner is established at 3% by volume. Conservative calculations indicate that the hydrogen content within the containment will not reach 3% by volume until 10 days after a loss-of-coolant accident.[10] There is, therefore, no need for immediate operation of the recombiner following an accident.

Auxiliary Component Cooling Pumps are provided to deliver cooling water for the two Recirculation Pumps located inside the containment. Each recirculation pump is fed by two Auxiliary Component Cooling Pumps. A single Auxiliary Component Cooling Pump is capable of supplying the necessary cooling water required for a recirculation pump during the recirculation phase following a loss-of-coolant accident.

The control room ventilation is designed to filter the control room atmosphere for intake air and/or for recirculation during control room isolation conditions. The control room system is designed to automatically start upon control room isolation and to maintain the control room pressure to the design positive pressure so that all leakage should be out leakage.

Radiation monitor R-1 is not part of the Control Room Ventilation System. NRC letter dated January 27, 1982 concluded that, at IP3, "radiation monitors for makeup air are not required." NYPA has also demonstrated (calculation dated May 29, 1992) that Central Control Room (CCR) isolation is not required for maintaining radiation exposure within General Design Criteria 19 limits following a fuel handling accident or gas-decay-tank rupture. For a loss of coolant accident, CCR isolation is initiated by the safety injection signal.

The control room is equipped with two independent toxic gas monitoring systems. One system in the control room consists of a channel for oxygen (with two oxygen detectors) and a channel each for ammonia and chlorine. The second system in the control room ventilation intake consists of one channel each for oxygen, ammonia and chlorine. Oxygen detectors are used to indirectly monitor changes in carbon dioxide levels.

These toxic gas monitoring systems are designed to alarm in the control room upon detection of the short term exposure limit (STEL) value. The operability of the toxic gas monitoring systems provides assurance that the control room operators will have adequate time to take protective action in the event of an accidental toxic gas release. Selection of the gases to be monitored are based on the results described in the Indian Point Unit 3 Habitability Study for the Control Room, dated July, 1981. The alarm setpoints will be in accordance with industrial ventilation standards as defined by the American Conference of Governmental Industrial Hygienists.[16]

The OPS has been designed to withstand the effects of the postulated worse case Mass Input (i.e., single safety injection pump) without exceeding the 10 CFR 50, Appendix G curve. Curve III on Figure 3.1.A-3 provides the setpoint curve of the OPS PORVs which is sufficiently below the Appendix G curve such that PORVs overshoots would not exceed the allowable Appendix G pressures. Therefore, only one safety injection pump can be available to feed water into the RCS when the OPS is operable. The other pumps must be prevented from injecting water into the RCS. This may be accomplished, for example, by placing the SI pump switches in the trip pull-out position, or by closing and locking (if manual) or de-energizing (if motor operated) at least one valve in the flow path from these pumps to the RCS. For conditions when the OPS is inoperable, additional restrictions are imposed on the RCS temperature, and pressurizer pressure and level. See Specification 3.1.A.8.b.(3).

References

1) FSAR Section 9
2) FSAR Section 6.2
3) FSAR Section 6.2
4) FSAR Section 6.3
5) FSAR Section 14.3.5
6) FSAR Section 1.2
7) FSAR Section 8.2
8) FSAR Section 9.6.1
9) FSAR Section 14.3
10) FSAR Section 6.8
11) FSAR Section 6.5
12) Response to Question 14.6, FSAR Volume 7
13) FSAR Appendix 14C
14) Response to Question 9.35, FSAR Volume 7
15) WCAP-12313, "Safety Evaluation for an Ultimate Heat Sink Temperature Increased to 95° at IP-3"
16) American Conference of Governmental Industrial Hygienists 1982 Industrial Ventilation, 19th Edition

Basis

The containment is designed for a pressure of 47 psig. [1] While the reactor is operating, the internal environment of the containment will be air at essentially atmospheric pressure and an average maximum temperature of approximately 130°F. The limiting peak containment temperature, based on LOCA containment response, is 261.5°F. [7] The peak containment pressure, also based on LOCA containment response, is 42.29 psig. [7] The acceptance criteria of specification 4.4.A.2. was changed by amendment 98 to reflect analysis [4] done for the ultimate heat sink temperature increase. As stated, the current peak pressure, calculated for high head safety injection flow balancing, is 42.29 psig. The acceptance criteria of 42.42 psig is conservative with respect to the current calculated peak pressure of 42.29.

Prior to initial operation, the containment was strength-tested at 54 psig and was leak-tested. The acceptance criterion for this pre-operational leakage rate test was established as 0.075 W/o (.75 L_a) per 24 hours at 40.6 psig and 263°F, which were the peak accident pressure and temperature conditions at that time. This leakage rate is consistent with the construction of the containment, [2] which is equipped with a Weld Channel and Penetration Pressurization System for continuously pressurizing the containment penetrations and the channels over certain containment liner welds. These channels were independently leak-tested during construction.

The safety analysis has been performed on the basis of a leakage rate of 0.10 W/o per day for 24 hours. With this leakage rate and with minimum containment engineered safeguards operating, the public exposure would be well below 10CFR100 values in the event of the design basis accident. [3]

The performance of a periodic integrated leakage rate test during plant life provides a current assessment of potential leakage from the containment in case of an accident that would pressurize the interior of the containment. In order to provide a realistic appraisal of the integrity of the containment under accident conditions, the containment isolation valves are to be closed in the normal manner and without preliminary exercising or adjustments.

ATTACHMENT II TO IPN-93-162

SAFETY EVALUATION OF TECHNICAL SPECIFICATION CHANGES ASSOCIATED WITH THE DISCONNECTION OF SECTIONS OF THE WELD CHANNEL PRESSURIZATION SYSTEM

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

SAFETY EVALUATION OF TECHNICAL SPECIFICATION CHANGES ASSOCIATED WITH THE DISCONNECTION OF SECTIONS OF THE WELD CHANNEL PRESSURIZATION SYSTEM

Section I - Description of Changes

This application for amendment to the Indian Point Unit 3 (IP3) Technical Specifications proposes to revise Section 3.3 of Appendix A of the Operating License. The proposed revision to Technical Specification 3.3.D.1.a would allow for the disconnection of those portions of the Weld Channel Pressurization System that become inoperable and are not practicably accessible for repair. This application also describes revisions to the bases in Sections 3.3 and 4.4 that reflect the disconnection of portions of the Weld Channel Pressurization System. Additionally, administrative changes to Technical Specifications 3.3.B.3.b and 3.3.E.3.b and to the bases of Section 3.3 are described in this application.

Section II - Evaluation of Changes

The Weld Channel and Containment Penetration Pressurization System (WC & PPS) continuously pressurizes the zones incorporated into the containment penetrations and the channels over the welds in the steel inner liner of the containment building. The system is designed to provide a means of determining the leak-tightness of the containment during power operation and provides assurance that the containment leak rate in the event of an accident is lower than that assumed in the accident analysis.

Although the WC & PPS is designed as an engineered safety feature, operation of the WC & PPS is not assumed in any accident analyses and is not taken credit for in any offsite accident dose calculations. No other safeguards systems are dependent upon operation of the WC & PPS. Additionally, only a small number of containment designs in the United States have the WC & PPS feature.

The portions of the WC & PPS that pressurize the channels over the welds in the steel inner liner of the containment building are referred to as the Weld Channel Pressurization System (WCPS). Most portions of the WCPS are practicably accessible for repair if a leak occurs in the weld channel, the air supply to the weld channel, or the air outlet piping from the weld channel. However, there are some portions of the WCPS which are not practicably accessible for repair. Approximately 20% of the WCPS piping would not be practicably accessible for repair, if it became inoperable.

One reason that some portions of the WCPS may not be practicably accessible for repair is because sections of WCPS piping are covered by concrete that is part of the containment structure. Since excavation of this concrete would involve the destruction of portions of the containment structure, repair of a leak in these portions of the WCPS would, in most cases, not be considered practicable. In addition, excavation of this concrete could involve the relocation of equipment in the containment building and/or high radiation doses to workers.

Another reason that some portions of the WCPS may not be practicably accessible for repair is because sections of the WCPS, although not located within the containment structure concrete, are located behind vital plant equipment in the containment building. Repairs of these portions of the WCPS would involve the relocation of equipment in the containment building. Repairs of these portions of the WCPS may, in some cases, not be considered practicable because the relocation of the equipment could potentially degrade the condition of the equipment. Additionally, the relocation of the equipment could involve high radiation doses to workers .

For these reasons, this amendment request proposes to revise the technical specifications to permit the disconnection of inoperable sections of the WCPS that are not practicably accessible for repair. The criteria for determining that a portion of the WCPS can be considered for disconnection will be included in the bases of Technical Specification Section 3.3.

A section of WCPS piping is considered to be inoperable if it brings the air consumption of the WC & PPS above the required 0.2% of the containment volume per day or if the section can not maintain a pressure above the required 43 psig. Each occurrence of an inoperable section of the WCPS that is considered to be not practicably accessible for repair would be evaluated by a separate evaluation and would be documented and reviewed under existing controls that cover plant modifications. The evaluation will include the basis for determining that the section of the WCPS is not practicably accessible for repair.

Inoperable sections of WCPS piping which can be considered for disconnection will satisfy one of the following criteria:

1) the piping is covered by concrete and repairs of the piping would involve the removal of some portion of the containment structure; or

2) the piping is located behind plant equipment in the containment building and repairs of the piping would involve the relocation of the equipment.

Disconnecting portions of the WCPS will not affect any portion of the WC & PPS that is associated with the pressurization of the containment penetrations or the pressurization of spaces between containment isolation valves. Therefore, the WC & PPS can still be used to perform 10 CFR Appendix J Part B and C testing. Those portions of the WCPS that remain connected to the WC & PPS will continue to be tested as part of the sensitive leak rate test described in Technical Specification 4.4.C. However, a revision to the bases in Section 4.4 is required to reflect the fact that, upon disconnection of a portion of the WCPS, all containment liner welds will not be covered by weld channels.

Integrated Leakage Rate Testing, as required by 10 CFR Appendix J Part A and Technical Specification 4.4.A, will not be affected by the disconnection of any portion of the WCPS. Leakage in the welds that are not monitored by the WCPS would continue to be detected during the performance of this test. Additional assurance of the integrity of the welds associated with disconnected portions of the WCPS is provided by the fact that all liner plate welds were successfully tested for leak tightness following initial installation of the containment liner.

Although the frequency of periodic Integrated Leakage Rate Testing is partially based on the fact that a WC & PPS exists at IP3, Integrated Leakage Rate Testing should not be adversely affected by the disconnection of portions of the WCPS because at least 80% of the containment liner welds and all of the containment penetrations will continue to be protected by the WC & PPS. The frequency of Integrated Leakage Rate Testing is also based on the following factors which are not affected by this technical specification change proposal: 1) the tests of the leak-tight integrity of the welds during initial installation; 2) the conformance of the complete containment to a low leakage rate limit during preoperational testing; and 3) the absence of any significant stresses in the liner during reactor operation.

Two administrative changes to the bases in Section 3.3 of the technical specifications are included in this application. One administrative change corrects an error which was introduced by License Amendment 67. The error that was introduced caused the bases to reference a nonexistent technical specification section. The error has been corrected such that the bases now references the appropriate technical specification section. The second administrative change to the bases corrects a typographical error.

Proposed changes to Technical Specifications 3.3.B.3.b and 3.3.E.3.b are also administrative changes, in that they correct two cases of erroneous referencing of one specification by another. The erroneous references found in 3.3.B.3.b and 3.3.E.3.b were inadvertently introduced by License Amendment 34, dated January 15, 1981. The proposed changes reflect the original intent of the Specifications.

WCPS Sections Proposed to be Disconnected During the Current Outage

There is a severe leak in the pipe which supplies the bottom liner zone 8 weld channel. All weld channel supply and air outlet piping that penetrates the concrete of the containment floor, including the zone 8 weld channel piping, is protected by 6 inch carbon steel pipe sleeves. These pipe sleeves were filled with grout to prevent weld channel pipe deterioration. However, although the bottom portion (approximately one foot) of the sleeve protecting the supply piping to the zone 8 weld channel is filled with grout, the top portion of the sleeve (approximately two feet) was not filled with grout. This allowed water to enter the pipe sleeve and corrode the weld channel supply piping. The leak in the zone 8 supply piping was verified by the use of a soapy water spray. The leak is approximately 18 inches below the containment floor. The regions below the leak are protected by grout, therefore, it is the Authority's belief that the source of the leakage is in the air supply line to the zone 8 weld channel and not in the containment liner or in the weld channel itself.

To repair the zone 8 weld channel supply piping, excavation of the reinforced concrete in the containment floor to a depth of approximately 3 feet and a diameter of approximately 3 to 4 feet (large enough for a welder to reach the weld channel supply piping) would be required. This would involve chipping away the concrete without damaging the steel reinforcing bar in this area. After repair of the piping, concrete would need to be repoured into the excavated area.

This repair process is considered a destructive repair to the containment structure. Excavating

this large quantity of concrete from the containment structure would invalidate all original preoperational tests performed on the containment, in particular the strength test which verified the structural adequacy of the design and construction of the containment. These preoperational tests would need to be reperformed. Additionally, a repair of this nature would require large radiation exposures to workers for extended periods of time.

Considering the extent of the drawbacks of a repair to this piping and the fact that operation of the WC & PPS is not assumed in any accident analyses, is not taken credit for in any offsite accident dose calculations, and is not depended upon by any other safeguards systems, the benefits of the repair would not justify performing the repair. Therefore, the Authority proposes to disconnect the zone 8 weld channel piping.

The air supply line to the weld channel will be cut approximately 2 inches below the top of the 6 inch protective pipe sleeve. The flow through connection on the other end of the zone will be left as installed. A nitrogen purge will be performed to evacuate all oxygen from the affected weld channel zone. This will prevent any potential corrosion of the liner welds in the containment mat associated with the zone 8 weld channel. The flow through connection side of the zone will be valved closed. The supply side piping will be plugged by pumping silicone into the piping and allowing the silicone to cure. The protective pipe sleeve will then be filled with grout to totally encase the deteriorated supply pipe. The low pressure switch associated with zone 8 will be disconnected and the control room indicator light for the zone will be disabled.

Since the ability to vent the zone 8 weld channel to the containment will not be affected by the disconnection of the zone, the Integrated Leakage Rate Test will continue to be performed with the zone 8 weld channel vented to containment. Therefore, the containment liner welds associated with the zone 8 weld channel will continue to be leak tested as part of the Integrated Leakage Rate Test. Additionally, although the containment liner welds will no longer be provided with a weld channel to protect against potential containment leakage, the nine feet of concrete below these containment liner welds provides a level of containment leak protection.

Section III - No Significant Hazards Evaluation

Consistent with the criteria of 10 CFR 50.92, the enclosed application is judged to involve no significant hazards based on the following information:

(1) Does the proposed license amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response:

The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. The consequences of an accident previously evaluated would not be affected by the disconnection of portions of the WCPS because the accident analyses do not assume the operation of any portion of the WC & PPS. Additionally, operation of the WC & PPS is not taken credit for in any offsite

accident dose calculations. The probability of an accident previously evaluated would not be increased because the disconnection of any portion of the WCPS could not initiate an accident. The administrative changes correct errors in the technical specifications and technical specification bases. These administrative changes have no affect on the probability or consequences of an accident previously evaluated.

(2) Does the proposed license amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response:

The proposed license amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated. The allowance for the disconnection of sections of the WCPS will allow the Authority to avoid repairs that can potentially degrade containment integrity or the condition of vital equipment. The proposed license amendment does not create the possibility of a new accident because the disconnection of any portion of the WCPS could not initiate an accident. The administrative changes correct errors in the technical specifications and technical specification bases. These administrative changes can not create the possibility of a new or different kind of accident from any accident previously evaluated.

(3) Does the proposed amendment involve a significant reduction in a margin of safety?

Response:

The proposed amendment would not involve a significant reduction in a margin of safety. The allowance for the disconnection of sections of the WCPS will allow the Authority to avoid repairs that can potentially degrade containment integrity or the condition of vital equipment. The WC & PPS will still provide continuous pressurization and monitoring of leak-tightness for the zones incorporated into the containment penetrations and for at least 80% of the channels over the welds in the steel inner liner of the containment building. The WC & PPS will continue to provide assurance that the containment leak rate in the event of an accident is lower than that assumed in the accident analyses because the accident analyses do not assume that any section of the WC & PPS is operating. The administrative changes correct errors in the technical specifications and technical specification bases. These administrative changes have no affect on any margin of safety.

Section IV - Impact of Changes

These changes will not adversely affect the following:

ALARA Program
Security and Fire Protection Programs
Emergency Plan
FSAR or SER Conclusions
Overall Plant Operations and the Environment

Section V - Conclusions

The incorporation of these changes: a) will not increase the probability nor the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the Safety Analysis Report; b) will not increase the possibility for an accident or malfunction of a different type than any evaluated previously in the Safety Analysis Report; c) will not reduce the margin of safety as defined in the bases for any technical specification; d) does not constitute an unreviewed safety question; and e) involves no significant hazards considerations as defined in 10 CFR 50.92.

Section VII - References

a) IP3 FSAR
b) IP3 SER
c) Nuclear Safety Evaluation No. 93-3-240 WCCPP, "Containment Mat Weld Joint Channel Zone No. 8 Abandonment."

ATTACHMENT III TO IPN-93-162

COMMITMENTS RELATED TO TECHNICAL SPECIFICATION CHANGES ASSOCIATED WITH THE DISCONNECTION OF SECTIONS OF THE WELD CHANNEL PRESSURIZATION SYSTEM

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COMMITMENTS RELATED TO TECHNICAL SPECIFICATION CHANGES ASSOCIATED WITH THE DISCONNECTION OF SECTIONS OF THE WELD CHANNEL PRESSURIZATION SYSTEM

Commitment Number	Commitment Description	Due Date
IPN-93-162-01	All required portions of the four WC & PPS zones will be pressurized above 43 psig except certain portions of the Weld Channel Pressurization System that have become inoperable and have been determined to be not practicably accessible for repair. These portions of the Weld Channel Pressurization System have been disconnected from the system and are no longer considered required portions of the four WC & PPS zones.	Within required implementation period after NRC approval
IPN-93-162-02	The provision that allows for the disconnection of portions of the WCPS piping does not apply to any other WC & PPS piping.	Within required implementation period after NRC approval
IPN-93-162-03	Each occurrence of an inoperable section of the WCPS that is considered to be not practicably accessible for repair would be evaluated by a separate evaluation and would be documented and reviewed under existing controls that cover plant modifications. The evaluation will include the basis for determining that the section of the WCPS is not practicably accessible for repair.	Within required implementation period after NRC approval
IPN-93-162-04	Inoperable sections of WCPS piping which can be considered for disconnection will satisfy one of the following criteria: 1) the piping is covered by concrete and repairs of the piping would involve the removal of some portion of the containment structure; or 2) the piping is located behind plant equipment within the Vapor Containment and repairs of the piping would involve the relocation of the equipment.	Within required implementation period after NRC approval

Commitment Number	Commitment Description	Due Date
IPN-93-162-05	Those portions of the WCPS that remain connected to the WC & PPS will continue to be tested as part of the sensitive leak rate test described in Technical Specification 4.4.C.	Within required implementation period after NRC approval
IPN-93-162-06	Integrated Leakage Rate Testing, as required by 10 CFR Appendix J Part A and Technical Specification 4.4.A, will not be affected by the disconnection of any portion of the WCPS.	Within required implementation period after NRC approval
IPN-93-162-07	At least 80% of the containment liner welds will continue to be protected by the WC & PPS.	Within required implementation period after NRC approval