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ATTENTION: "REPLACE" directions do not affect the Table of Contents, Therefore no TOC will be issued with the updated material.

TSB1 - TECHNICAL SPECIFICATION BASES UNIT 1 MANUAL

REMOVE MANUAL TABLE OF CONTENTS DATE: 02/19/2010

ADD MANUAL TABLE OF CONTENTS DATE: 03/10/2010

CATEGORY: DOCUMENTS TYPE: TSB1

*ADD
NR*

ID: TEXT 3.6.4.2
REMOVE: REV:2

ADD: REV: 3

CATEGORY: DOCUMENTS TYPE: TSB1

ID: TEXT LOES

ADD: REV: 95

REMOVE: REV:94

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SSSES MANUAL

Manual Name: TSB1

Manual Title: TECHNICAL SPECIFICATION BASES UNIT 1 MANUAL

Table Of Contents

Issue Date: 03/10/2010

<u>Procedure Name</u>	<u>Rev</u>	<u>Issue Date</u>	<u>Change ID</u>	<u>Change Number</u>
TEXT LOES	95	03/10/2010		
Title: LIST OF EFFECTIVE SECTIONS				
TEXT TOC	17	08/20/2009		
Title: TABLE OF CONTENTS				
TEXT 2.1.1	5	05/06/2009		
Title: SAFETY LIMITS (SLS) REACTOR CORE SLS				
TEXT 2.1.2	1	10/04/2007		
Title: SAFETY LIMITS (SLS) REACTOR COOLANT SYSTEM (RCS) PRESSURE S				
TEXT 3.0	3	08/20/2009		
Title: LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY				
TEXT 3.1.1	1	04/18/2006		
Title: REACTIVITY CONTROL SYSTEMS SHUTDOWN MARGIN (SDM)				
TEXT 3.1.2	0	11/15/2002		
Title: REACTIVITY CONTROL SYSTEMS REACTIVITY ANOMALIES				
TEXT 3.1.3	2	01/19/2009		
Title: REACTIVITY CONTROL SYSTEMS CONTROL ROD OPERABILITY				
TEXT 3.1.4	4	01/30/2009		
Title: REACTIVITY CONTROL SYSTEMS CONTROL ROD SCRAM TIMES				
TEXT 3.1.5	1	07/06/2005		
Title: REACTIVITY CONTROL SYSTEMS CONTROL ROD SCRAM ACCUMULATORS				
TEXT 3.1.6	2	04/18/2006		
Title: REACTIVITY CONTROL SYSTEMS ROD PATTERN CONTROL				

SSES MANUAL

Manual Name: TSB1

Manual Title: TECHNICAL SPECIFICATION BASES UNIT 1 MANUAL

TEXT 3.1.7 3 04/23/2008
Title: REACTIVITY CONTROL SYSTEMS STANDBY LIQUID CONTROL (SLC) SYSTEM

TEXT 3.1.8 3 05/06/2009
Title: REACTIVITY CONTROL SYSTEMS SCRAM DISCHARGE VOLUME (SDV) VENT AND DRAIN VALVES

TEXT 3.2.1 2 04/23/2008
Title: POWER DISTRIBUTION LIMITS AVERAGE PLANAR LINEAR HEAT GENERATION RATE (APLHGR)

TEXT 3.2.2 3 05/06/2009
Title: POWER DISTRIBUTION LIMITS MINIMUM CRITICAL POWER RATIO (MCPR)

TEXT 3.2.3 2 04/23/2008
Title: POWER DISTRIBUTION LIMITS LINEAR HEAT GENERATION RATE (LHGR)

TEXT 3.3.1.1 4 04/23/2008
Title: INSTRUMENTATION REACTOR PROTECTION SYSTEM (RPS) INSTRUMENTATION

TEXT 3.3.1.2 2 01/19/2009
Title: INSTRUMENTATION SOURCE RANGE MONITOR (SRM) INSTRUMENTATION

TEXT 3.3.2.1 3 04/23/2008
Title: INSTRUMENTATION CONTROL ROD BLOCK INSTRUMENTATION

TEXT 3.3.2.2 1 04/23/2008
Title: INSTRUMENTATION FEEDWATER MAIN TURBINE HIGH WATER LEVEL TRIP INSTRUMENTATION

TEXT 3.3.3.1 8 10/27/2008
Title: INSTRUMENTATION POST ACCIDENT MONITORING (PAM) INSTRUMENTATION

TEXT 3.3.3.2 1 04/18/2005
Title: INSTRUMENTATION REMOTE SHUTDOWN SYSTEM

TEXT 3.3.4.1 1 04/23/2008
Title: INSTRUMENTATION END OF CYCLE RECIRCULATION PUMP TRIP (EOC-RPT) INSTRUMENTATION

SSES MANUAL

Manual Name: TSB1

Manual Title: TECHNICAL SPECIFICATION BASES UNIT 1 MANUAL

TEXT 3.3.4.2 0 11/15/2002
Title: INSTRUMENTATION ANTICIPATED TRANSIENT WITHOUT SCRAM RECIRCULATION PUMP TRIP (ATWS-RPT) INSTRUMENTATION

TEXT 3.3.5.1 3 08/20/2009
Title: INSTRUMENTATION EMERGENCY CORE COOLING SYSTEM (ECCS) INSTRUMENTATION

TEXT 3.3.5.2 0 11/15/2002
Title: INSTRUMENTATION REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM INSTRUMENTATION

TEXT 3.3.6.1 4 04/23/2008
Title: INSTRUMENTATION PRIMARY CONTAINMENT ISOLATION INSTRUMENTATION

TEXT 3.3.6.2 3 10/27/2008
Title: INSTRUMENTATION SECONDARY CONTAINMENT ISOLATION INSTRUMENTATION

TEXT 3.3.7.1 2 10/27/2008
Title: INSTRUMENTATION CONTROL ROOM EMERGENCY OUTSIDE AIR SUPPLY (CREOAS) SYSTEM INSTRUMENTATION

TEXT 3.3.8.1 2 12/17/2007
Title: INSTRUMENTATION LOSS OF POWER (LOP) INSTRUMENTATION

TEXT 3.3.8.2 0 11/15/2002
Title: INSTRUMENTATION REACTOR PROTECTION SYSTEM (RPS) ELECTRIC POWER MONITORING

TEXT 3.4.1 3 04/12/2006
Title: REACTOR COOLANT SYSTEM (RCS) RECIRCULATION LOOPS OPERATING

TEXT 3.4.2 1 04/23/2008
Title: REACTOR COOLANT SYSTEM (RCS) JET PUMPS

TEXT 3.4.3 2 04/23/2008
Title: REACTOR COOLANT SYSTEM RCS SAFETY RELIEF VALVES S/RVS

TEXT 3.4.4 0 11/15/2002
Title: REACTOR COOLANT SYSTEM (RCS) RCS OPERATIONAL LEAKAGE

SSES MANUAL

Manual Name: TSB1

Manual Title: TECHNICAL SPECIFICATION BASES UNIT 1 MANUAL

TEXT 3.4.5 1 01/16/2006
Title: REACTOR COOLANT SYSTEM (RCS) RCS PRESSURE ISOLATION VALVE (PIV) LEAKAGE

TEXT 3.4.6 2 08/20/2009
Title: REACTOR COOLANT SYSTEM (RCS) RCS LEAKAGE DETECTION INSTRUMENTATION

TEXT 3.4.7 2 10/04/2007
Title: REACTOR COOLANT SYSTEM (RCS) RCS SPECIFIC ACTIVITY

TEXT 3.4.8 1 04/18/2005
Title: REACTOR COOLANT SYSTEM (RCS) RESIDUAL HEAT REMOVAL (RHR) SHUTDOWN COOLING SYSTEM
- HOT SHUTDOWN

TEXT 3.4.9 0 11/15/2002
Title: REACTOR COOLANT SYSTEM (RCS) RESIDUAL HEAT REMOVAL (RHR) SHUTDOWN COOLING SYSTEM
- COLD SHUTDOWN

TEXT 3.4.10 3 04/23/2008
Title: REACTOR COOLANT SYSTEM (RCS) RCS PRESSURE AND TEMPERATURE (P/T) LIMITS

TEXT 3.4.11 0 11/15/2002
Title: REACTOR COOLANT SYSTEM (RCS) REACTOR STEAM DOME PRESSURE

TEXT 3.5.1 2 01/16/2006
Title: EMERGENCY CORE COOLING SYSTEMS (ECCS) AND REACTOR CORE ISOLATION COOLING (RCIC)
SYSTEM ECCS - OPERATING

TEXT 3.5.2 0 11/15/2002
Title: EMERGENCY CORE COOLING SYSTEMS (ECCS) AND REACTOR CORE ISOLATION COOLING (RCIC)
SYSTEM ECCS - SHUTDOWN

TEXT 3.5.3 1 04/18/2005
Title: EMERGENCY CORE COOLING SYSTEMS (ECCS) AND REACTOR CORE ISOLATION COOLING (RCIC)
SYSTEM RCIC SYSTEM

TEXT 3.6.1.1 3 04/23/2008
Title: CONTAINMENT SYSTEMS PRIMARY CONTAINMENT

TEXT 3.6.1.2 1 04/23/2008
Title: CONTAINMENT SYSTEMS PRIMARY CONTAINMENT AIR LOCK

SSES MANUAL

Manual Name: TSB1

Manual Title: TECHNICAL SPECIFICATION BASES UNIT 1 MANUAL

TEXT 3.6.1.3	8	04/23/2008		
Title: CONTAINMENT SYSTEMS PRIMARY CONTAINMENT ISOLATION VALVES (PCIVS)				
			LDCN	3092
			LDCN	4683
TEXT 3.6.1.4	1	04/23/2008		
Title: CONTAINMENT SYSTEMS CONTAINMENT PRESSURE				
TEXT 3.6.1.5	1	10/05/2005		
Title: CONTAINMENT SYSTEMS DRYWELL AIR TEMPERATURE				
TEXT 3.6.1.6	0	11/15/2002		
Title: CONTAINMENT SYSTEMS SUPPRESSION CHAMBER-TO-DRYWELL VACUUM BREAKERS				
TEXT 3.6.2.1	2	04/23/2008		
Title: CONTAINMENT SYSTEMS SUPPRESSION POOL AVERAGE TEMPERATURE				
TEXT 3.6.2.2	0	11/15/2002		
Title: CONTAINMENT SYSTEMS SUPPRESSION POOL WATER LEVEL				
TEXT 3.6.2.3	1	01/16/2006		
Title: CONTAINMENT SYSTEMS RESIDUAL HEAT REMOVAL (RHR) SUPPRESSION POOL COOLING				
TEXT 3.6.2.4	0	11/15/2002		
Title: CONTAINMENT SYSTEMS RESIDUAL HEAT REMOVAL (RHR) SUPPRESSION POOL SPRAY				
TEXT 3.6.3.1	2	06/13/2006		
Title: CONTAINMENT SYSTEMS PRIMARY CONTAINMENT HYDROGEN RECOMBINERS				
TEXT 3.6.3.2	1	04/18/2005		
Title: CONTAINMENT SYSTEMS DRYWELL AIR FLOW SYSTEM				
TEXT 3.6.3.3	0	11/15/2002		
Title: CONTAINMENT SYSTEMS PRIMARY CONTAINMENT OXYGEN CONCENTRATION				

SSES MANUAL

Manual Name: TSB1

Manual Title: TECHNICAL SPECIFICATION BASES UNIT 1 MANUAL

TEXT 3.6.4.1 7 10/04/2007

Title: CONTAINMENT SYSTEMS SECONDARY CONTAINMENT

TEXT 3.6.4.2 3 03/10/2010

Title: CONTAINMENT SYSTEMS SECONDARY CONTAINMENT ISOLATION VALVES (SCIVS)

TEXT 3.6.4.3 4 09/21/2006

Title: CONTAINMENT SYSTEMS STANDBY GAS TREATMENT (SGT) SYSTEM

TEXT 3.7.1 3 05/06/2009

Title: PLANT SYSTEMS RESIDUAL HEAT REMOVAL SERVICE WATER (RHRSW) SYSTEM AND THE ULTIMATE HEAT SINK (UHS)

TEXT 3.7.2 2 02/11/2009

Title: PLANT SYSTEMS EMERGENCY SERVICE WATER (ESW) SYSTEM

TEXT 3.7.3 1 01/08/2010

Title: PLANT SYSTEMS CONTROL ROOM EMERGENCY OUTSIDE AIR SUPPLY (CREOAS) SYSTEM

TEXT 3.7.4 0 11/15/2002

Title: PLANT SYSTEMS CONTROL ROOM FLOOR COOLING SYSTEM

TEXT 3.7.5 1 10/04/2007

Title: PLANT SYSTEMS MAIN CONDENSER OFFGAS

TEXT 3.7.6 2 04/23/2008

Title: PLANT SYSTEMS MAIN TURBINE BYPASS SYSTEM

TEXT 3.7.7 1 10/04/2007

Title: PLANT SYSTEMS SPENT FUEL STORAGE POOL WATER LEVEL

TEXT 3.7.8 0 04/23/2008

Title: PLANT SYSTEMS

TEXT 3.8.1 6 05/06/2009

Title: ELECTRICAL POWER SYSTEMS AC SOURCES - OPERATING

SSES MANUAL

Manual Name: TSB1

Manual Title: TECHNICAL SPECIFICATION BASES UNIT 1 MANUAL

TEXT 3.8.2	0	11/15/2002		
Title: ELECTRICAL POWER SYSTEMS AC SOURCES - SHUTDOWN				
TEXT 3.8.3	1	04/23/2008		
Title: ELECTRICAL POWER SYSTEMS DIESEL FUEL OIL, LUBE OIL, AND STARTING AIR				
			LDCN	4755
TEXT 3.8.4	3	01/19/2009		
Title: ELECTRICAL POWER SYSTEMS DC SOURCES - OPERATING				
TEXT 3.8.5	1	12/14/2006		
Title: ELECTRICAL POWER SYSTEMS DC SOURCES - SHUTDOWN				
TEXT 3.8.6	1	12/14/2006		
Title: ELECTRICAL POWER SYSTEMS BATTERY CELL PARAMETERS				
TEXT 3.8.7	1	10/05/2005		
Title: ELECTRICAL POWER SYSTEMS DISTRIBUTION SYSTEMS - OPERATING				
TEXT 3.8.8	0	11/15/2002		
Title: ELECTRICAL POWER SYSTEMS DISTRIBUTION SYSTEMS - SHUTDOWN				
TEXT 3.9.1	0	11/15/2002		
Title: REFUELING OPERATIONS REFUELING EQUIPMENT INTERLOCKS				
TEXT 3.9.2	0	11/15/2002		
Title: REFUELING OPERATIONS REFUEL POSITION ONE-ROD-OUT INTERLOCK				
TEXT 3.9.3	0	11/15/2002		
Title: REFUELING OPERATIONS CONTROL ROD POSITION				
TEXT 3.9.4	0	11/15/2002		
Title: REFUELING OPERATIONS CONTROL ROD POSITION INDICATION				
TEXT 3.9.5	0	11/15/2002		
Title: REFUELING OPERATIONS CONTROL ROD OPERABILITY - REFUELING				

SSES MANUAL

Manual Name: TSB1

Manual Title: TECHNICAL SPECIFICATION BASES UNIT 1 MANUAL

TEXT 3.9.6 1 10/04/2007
Title: REFUELING OPERATIONS REACTOR PRESSURE VESSEL (RPV) WATER LEVEL

TEXT 3.9.7 0 11/15/2002
Title: REFUELING OPERATIONS RESIDUAL HEAT REMOVAL (RHR) - HIGH WATER LEVEL

TEXT 3.9.8 0 11/15/2002
Title: REFUELING OPERATIONS RESIDUAL HEAT REMOVAL (RHR) - LOW WATER LEVEL

TEXT 3.10.1 1 01/23/2008
Title: SPECIAL OPERATIONS INSERVICE LEAK AND HYDROSTATIC TESTING OPERATION

TEXT 3.10.2 0 11/15/2002
Title: SPECIAL OPERATIONS REACTOR MODE SWITCH INTERLOCK TESTING

TEXT 3.10.3 0 11/15/2002
Title: SPECIAL OPERATIONS SINGLE CONTROL ROD WITHDRAWAL - HOT SHUTDOWN

TEXT 3.10.4 0 11/15/2002
Title: SPECIAL OPERATIONS SINGLE CONTROL ROD WITHDRAWAL - COLD SHUTDOWN

TEXT 3.10.5 0 11/15/2002
Title: SPECIAL OPERATIONS SINGLE CONTROL ROD DRIVE (CRD) REMOVAL - REFUELING

TEXT 3.10.6 0 11/15/2002
Title: SPECIAL OPERATIONS MULTIPLE CONTROL ROD WITHDRAWAL - REFUELING

TEXT 3.10.7 1 04/18/2006
Title: SPECIAL OPERATIONS CONTROL ROD TESTING - OPERATING

TEXT 3.10.8 1 04/12/2006
Title: SPECIAL OPERATIONS SHUTDOWN MARGIN (SDM) TEST - REFUELING

SUSQUEHANNA STEAM ELECTRIC STATION
LIST OF EFFECTIVE SECTIONS (TECHNICAL SPECIFICATIONS BASES)

<u>Section</u>	<u>Title</u>	<u>Revision</u>
TOC	Table of Contents	17
B 2.0	SAFETY LIMITS BASES	
	Page B 2.0-1	0
	Page TS / B 2.0-2	3
	Page TS / B 2.0-3	5
	Page TS / B 2.0-4	3
	Page TS / B 2.0-5	5
	Page TS / B 2.0-6	1
	Pages TS / B 2.0-7 through TS / B 2.0-9	1
B 3.0	LCO AND SR APPLICABILITY BASES	
	Page TS / B 3.0-1	1
	Pages TS / B 3.0-2 through TS / B 3.0-4	0
	Pages TS / B 3.0-5 through TS / B 3.0-7	1
	Page TS / B 3.0-8	3
	Pages TS / B 3.0-9 through TS / B 3.0-11	2
	Page TS / B 3.0-11a	0
	Page TS / B 3.0-12	1
	Pages TS / B 3.0-13 through TS / B 3.0-15	2
	Pages TS / B 3.0-16 and TS / B 3.0-17	0
B 3.1	REACTIVITY CONTROL BASES	
	Pages B 3.1-1 through B 3.1-4	0
	Page TS / B 3.1-5	1
	Pages TS / B 3.1-6 and TS / B 3.1-7	2
	Pages B 3.1-8 through B 3.1-13	0
	Page TS / B 3.1-14	1
	Page B 3.1-15	0
	Page TS / B 3.1-16	1
	Pages B 3.1-17 through B 3.1-19	0
	Pages TS / B 3.1-20 and TS / B 3.1-21	1
	Page TS / B 3.1-22	0
	Page TS / B 3.1-23	1
	Page TS / B 3.1-24	0
	Pages TS / B 3.1-25 through TS / B 3.1-27	1
	Page TS / B 3.1-28	2
	Page TS / B 3.1-29	1
	Pages B 3.1-30 through B 3.1-33	0
	Pages TS / B 3.1-34 through TS / B 3.1-36	1
	Pages TS / B 3.1-37 and TS / B 3.1-38	2
	Page TS / B 3.1-39 and TS / B 3.1-40	2
	Page TS / B 3.1-40a	0
	Pages TS / B 3.1-41 and TS / B 3.1-42	2

SUSQUEHANNA STEAM ELECTRIC STATION
LIST OF EFFECTIVE SECTIONS (TECHNICAL SPECIFICATIONS BASES)

<u>Section</u>	<u>Title</u>	<u>Revision</u>
	Page TS / B 3.1.43	1
	Page TS / B 3.1-44	0
	Page TS / B 3.1-45	3
	Pages TS / B 3.1-46 through TS / B 3.1-49	1
	Page TS / B 3.1-50	0
	Page TS / B 3.1-51	3
B 3.2	POWER DISTRIBUTION LIMITS BASES	
	Page TS / B 3.2-1	2
	Pages TS / B 3.2-2 and TS / B 3.2-3	3
	Pages TS / B 3.2-4 and TS / B 3.2-5	2
	Page TS / B 3.2-6	3
	Page B 3.2-7	1
	Pages TS / B 3.2-8 and TS / B 3.2-9	3
	Page TS / B 3.2.10	2
	Page TS / B 3.2-11	3
	Page TS / B 3.2-12	1
	Page TS / B 3.2-13	2
B 3.3	INSTRUMENTATION	
	Pages TS / B 3.3-1 through TS / B 3.3-4	1
	Page TS / B 3.3-5	2
	Page TS / B 3.3-6	1
	Page TS / B 3.3-7	3
	Page TS / B 3.3-7a	1
	Page TS / B 3.3-8	4
	Pages TS / B 3.3-9 through TS / B 3.3-12	3
	Pages TS / B 3.3-12a	1
	Pages TS / B 3.3-12b and TS / B 3.3-12c	0
	Page TS / B 3.3-13	1
	Page TS / B 3.3-14	3
	Pages TS / B 3.3-15 and TS / B 3.3-16	1
	Pages TS / B 3.3-17 and TS / B 3.3-18	4
	Page TS / B 3.3-19	1
	Pages TS / B 3.3-20 through TS / B 3.3-22	2
	Page TS / B 3.3-22a	0
	Pages TS / B 3.3-23 and TS / B 3.3-24	2
	Pages TS / B 3.3-24a and TS / B 3.3-24b	0
	Page TS / B 3.3-25	3
	Page TS / B 3.3-26	2
	Page TS / B 3.3-27	1
	Pages TS / B 3.3-28 through TS / B 3.3-30	3
	Page TS / B 3.3-30a	0

SUSQUEHANNA STEAM ELECTRIC STATION
LIST OF EFFECTIVE SECTIONS (TECHNICAL SPECIFICATIONS BASES)

<u>Section</u>	<u>Title</u>	<u>Revision</u>
	Page TS / B 3.3-31	4
	Page TS / B 3.3-32	5
	Pages TS / B 3.3-32a	0
	Page TS / B 3.3-32b	1
	Page TS / B 3.3-33	5
	Page TS / B 3.3-33a	0
	Page TS / B 3.3-34	1
	Pages TS / B 3.3-35 and TS / B 3.3-36	2
	Pages TS / B 3.3-37 and TS / B 3.3-38	1
	Page TS / B 3.3-39	2
	Pages TS / B 3.3-40 through TS / B 3.3-43	1
	Page TS / B 3.3-44	4
	Pages TS / B 3.3-44a and TS / B 3.3-44b	0
	Page TS / B 3.3-45	3
	Pages TS / B 3.3-45a and TS / B 3.3-45b	0
	Page TS / B 3.3-46	3
	Pages TS / B 3.3-47	2
	Pages TS / B 3.3-48 through TS / B 3.3-51	3
	Pages TS / B 3.3-52 and TS / B 3.3-53	2
	Page TS / B 3.3-53a	0
	Page TS / B 3.3-54	4
	Page B 3.3-55	1
	Page B 3.3-56	0
	Page B 3.3-57	1
	Page B 3.3-58	0
	Page B 3.3-59	1
	Pages B 3.3-60 through B 3.3-63	0
	Pages TS / B 3.3-64 and TS / B 3.3-65	2
	Page TS / B 3.3-66	4
	Page TS / B 3.3-67	3
	Page TS / B 3.3-68	4
	Page TS / B 3.3-69	5
	Pages TS / B 3.3-70	4
	Page TS / B 3.3-71	3
	Pages TS / B 3.3-72 and TS / B 3.3-73	2
	Page TS / B 3.3-74	3
	Page TS / B 3.3-75	2
	Page TS / B 3.3-75a	6
	Page TS / B 3.3-75b	7
	Page TS / B 3.3-75c	5
	Pages B 3.3-76 through 3.3-77	0
	Page TS / B 3.3-78	1
	Pages B 3.3-79 through B 3.3-81	0
	Page B 3.3-82	1

SUSQUEHANNA STEAM ELECTRIC STATION
LIST OF EFFECTIVE SECTIONS (TECHNICAL SPECIFICATIONS BASES)

<u>Section</u>	<u>Title</u>	<u>Revision</u>
	Page B 3.3-83	0
	Pages B 3.3-84 and B 3.3-85	1
	Page B 3.3-86	0
	Page B 3.3-87	1
	Page B 3.3-88	0
	Page B 3.3-89	1
	Page TS / B 3.3-90	1
	Page B 3.3-91	0
	Pages TS / B 3.3-92 through TS / B 3.3-100	1
	Pages TS / B 3.3-101 through TS / B 3.3-103	0
	Page TS / B 3.3-104	2
	Pages TS / B 3.3-105 and TS / B 3.3-106	0
	Page TS / B 3.3-107	1
	Page TS / B 3.3-108	0
	Page TS / B 3.3-109	1
	Pages TS / B 3.3-110 and TS / B 3.3-111	0
	Pages TS / B 3.3-112 and TS / B 3.3-112a	1
	Pages TS / B 3.3-113 through TS / B 3.3-115	1
	Page TS / B 3.3-116	3
	Page TS / B 3.3-117	1
	Pages TS / B 3.3-118 through TS / B 3.3-122	0
	Pages TS / B 3.3-123 and TS / B 3.3-124	1
	Page TS / B 3.3-124a	0
	Page TS / B 3.3-125	0
	Pages TS / B 3.3-126 and TS / B 3.3-127	1
	Pages TS / B 3.3-128 through TS / B 3.3-130	0
	Page TS / B 3.3-131	1
	Pages TS / B 3.3-132 through TS / B 3.3-134	0
	Pages B 3.3-135 through B 3.3-137	0
	Page TS / B 3.3-138	1
	Pages B 3.3-139 through B 3.3-149	0
	Pages TS / B 3.3-150 and TS / B 3.3-151	1
	Pages TS / B 3.3-152 through TS / B 3.3-154	2
	Page TS / B 3.3-155	1
	Pages TS / B 3.3-156 through TS / B 3.3-158	2
	Pages TS / B 3.3-159 through TS / B 3.3-162	1
	Page TS / B 3.3-163	2
	Pages TS / B 3.3-164 and TS / B 3.3-165	1
	Pages TS / B 3.3-166 and TS / B 3.3-167	2
	Pages TS / B 3.3-168 and TS / B 3.3-169	1
	Page TS / B 3.3-170	2
	Pages TS / B 3.3-171 through TS / B 3.3-177	1
	Pages TS / B 3.3-178 through TS / B 3.3-179a	2
	Pages TS / B 3.3-179b and TS / B 3.3-179c	0
	Page TS / B 3.3-180	1

SUSQUEHANNA STEAM ELECTRIC STATION
LIST OF EFFECTIVE SECTIONS (TECHNICAL SPECIFICATIONS BASES)

<u>Section</u>	<u>Title</u>	<u>Revision</u>
	Page TS / B 3.3-181	3
	Page TS / B 3.3-182	1
	Page TS / B 3.3-183	2
	Page TS / B 3.3-184	1
	Page TS / B 3.3-185	3
	Page TS / B 3.3-186	1
	Pages TS / B 3.3-187 and TS / B 3.3-188	2
	Pages TS / B 3.3-189 through TS / B 3.3-191	1
	Page TS / B 3.3-192	0
	Page TS / B 3.3-193	1
	Pages TS / B 3.3-194 and TS / B 3.3-195	0
	Page TS / B 3.3-196	2
	Pages TS / B 3.3-197 through TS / B 3.3-204	0
	Page TS / B 3.3-205	1
	Pages B 3.3-206 through B 3.3-209	0
	Page TS / B 3.3-210	1
	Pages B 3.3-211 through B 3.3-219	0
B 3.4	REACTOR COOLANT SYSTEM BASES	
	Pages B 3.4-1 and B 3.4-2	0
	Pages TS / B 3.4-3 and Page TS / B 3.4-4	4
	Pages TS / B 3.4-5 through TS / B 3.4-9	2
	Pages B 3.4-10 through B 3.4-12	0
	Page B 3.4-13	1
	Page B 3.4-14	0
	Page TS / B 3.4-15	2
	Pages TS / B 3.4-16 and TS / B 3.4-17	3
	Page TS / B 3.4-18	2
	Pages B 3.4-19 through B 3.4-27	0
	Pages TS / B 3.4-28 and TS / B 3.4-29	1
	Pages TS / B 3.4-30 and TS / B 3.4-31	0
	Pages TS / B 3.4-32 and TS / B 3.4-33	1
	Page TS / B 3.4-34	0
	Pages TS / B 3.4-35 and TS / B 3.4-36	1
	Page TS / B 3.4-37	2
	Page TS / B 3.4-38	1
	Pages B 3.4-39 and B 3.4-40	0
	Page TS / B 3.4-41	1
	Pages B 3.4-42 through B 3.4-48	0
	Page TS / B 3.4-49	3
	Page TS / B 3.4-50	1
	Page TS / B 3.4-51	3
	Page TS / B 3.4-52	2
	Page TS / B 3.4-53	1

SUSQUEHANNA STEAM ELECTRIC STATION
LIST OF EFFECTIVE SECTIONS (TECHNICAL SPECIFICATIONS BASES)

<u>Section</u>	<u>Title</u>	<u>Revision</u>
	Pages TS / B 3.4-54 through TS / B 3.4-56	2
	Page TS / B 3.4-57	3
	Pages TS / B 3.4-58 through TS / B 3.4-60	1
B 3.5	ECCS AND RCIC BASES	
	Pages B 3.5-1 and B 3.5-2	0
	Page TS / B 3.5-3	2
	Page TS / B 3.5-4	1
	Page TS / B 3.5-5	2
	Page TS / B 3.5-6	1
	Pages B 3.5-7 through B 3.5-10	0
	Page TS / B 3.5-11	1
	Page TS / B 3.5-12	0
	Page TS / B 3.5-13	1
	Pages TS / B 3.5-14 and TS / B 3.5-15	0
	Pages TS / B 3.5-16 through TS / B 3.5-18	1
	Pages B 3.5-19 through B 3.5-24	0
	Page TS / B 3.5-25	1
	Pages TS / B 3.5-26 and TS / B 3.5-27	1
	Pages B 3.5-28 through B 3.5-31	0
B 3.6	CONTAINMENT SYSTEMS BASES	
	Page TS / B 3.6-1	2
	Page TS / B 3.6-1a	3
	Page TS / B 3.6-2	4
	Page TS / B 3.6-3	3
	Page TS / B 3.6-4	4
	Pages TS / B 3.6-5 and TS / B 3.6-6	3
	Pages TS / B 3.6-6a and TS / B 3.6-6b	2
	Page TS / B 3.6-6c	0
	Pages B 3.6-7	0
	Page B 3.6-8	1
	Pages B 3.6-9 through B 3.6-14	0
	Page TS / B 3.6-15	2
	Page TS / B 3.6-15a	0
	Page TS / B 3.6-15b	2
	Pages TS / B 3.6-16 and TS / B 3.6-17	1
	Page TS / B 3.6-17a	0
	Pages TS / B 3.6-18 and TS / B 3.6-19	0
	Page TS / B 3.6-20	1
	Page TS / B 3.6-21	2
	Page TS / B 3.6-22	1
	Page TS / B 3.6-22a	0
	Page TS / B 3.6-23	1

SUSQUEHANNA STEAM ELECTRIC STATION
LIST OF EFFECTIVE SECTIONS (TECHNICAL SPECIFICATIONS BASES)

<u>Section</u>	<u>Title</u>	<u>Revision</u>
	Pages TS / B 3.6-24 and TS / B 3.6-25	0
	Pages TS / B 3.6-26 and TS / B 3.6-27	2
	Page TS / B 3.6-28	7
	Page TS / B 3.6-29	2
	Page TS / B 3.6-30	1
	Page TS / B 3.6-31	3
	Page TS / B 3.6-32	0
	Page TS / B 3.6-33	1
	Pages TS / B 3.6-34 and TS / B 3.6-35	0
	Page TS / B 3.6-36	1
	Page TS / B 3.6-37	0
	Page TS / B 3.6-38	3
	Page TS / B 3.6-39	2
	Page TS / B 3.6-40	6
	Page B 3.6-41	1
	Pages B 3.6-42 and B 3.6-43	3
	Pages TS / B 3.6-44 and TS / B 3.6-45	1
	Page TS / B 3.6-46	2
	Pages TS / B 3.6-47 through TS / B 3.6-51	1
	Page TS / B 3.6-52	2
	Pages TS / B 3.6-53 through TS / B 3.6-56	0
	Page TS / B 3.6-57	1
	Page TS / 3.6-58	2
	Pages B 3.6-59 through B 3.6-63	0
	Pages TS / B 3.6-64 and TS / B 3.6-65	1
	Pages B 3.6-66 through B 3.6-69	0
	Pages TS / B 3.6-70 through TS / B 3.6-72	1
	Page TS / B 3.6-73	2
	Pages TS / B 3.6-74 and TS / B 3.6-75	1
	Pages B 3.6-76 and B 3.6-77	0
	Page TS / B 3.6-78	1
	Pages B 3.6-79 through B 3.3.6-83	0
	Page TS / B 3.6-84	3
	Page TS / B 3.6-85	2
	Page TS / B 3.6-86	4
	Pages TS / B 3.6-87 through TS / B 3.6-88a	2
	Page TS / B 3.6-89	4
	Page TS / B 3.6-90	2
	Page TS / B 3.6-91	3
	Pages TS / B 3.6-92 through TS / B 3.6-96	1
	Page TS / B 3.6-97	2
	Pages TS / B 3.6-98 and TS / B 3.6-99	1
	Page TS / B 3.6-100	3
	Page TS / B 3.6-100a	0
	Pages TS / B 3.6-101 and TS / B 3.6-102	1

SUSQUEHANNA STEAM ELECTRIC STATION
LIST OF EFFECTIVE SECTIONS (TECHNICAL SPECIFICATIONS BASES)

<u>Section</u>	<u>Title</u>	<u>Revision</u>
	Pages TS / B 3.6-103 and TS / B 3.6-104	2
	Page TS / B 3.6-105	3
	Page TS / B 3.6-106	2
	Page TS / B 3.6-107	3
B 3.7	PLANT SYSTEMS BASES	
	Pages TS / B 3.7-1	3
	Page TS / B 3.7-2	4
	Pages TS / B 3.7-3 through TS / B 3.7-5	3
	Page TS / B 3.7-5a	0
	Pages TS / B 3.7-6 and TS / B 3.7-6a	2
	Page TS / B 3.7-6b	1
	Page TS / B 3.7-6c	2
	Page TS / B 3.7-7	3
	Page TS / B 3.7-8	2
	Pages TS / B 3.7-9 through TS / B 3.7-11	1
	Pages TS / B 3.7-12 and TS / B 3.7-13	2
	Pages TS / B 3.7-14 through TS / B 3.7-18	3
	Page TS / B 3.7-18a	1
	Pages TS / B 3.7-18b through TS / B 3.7-18e	0
	Pages TS / B 3.7-19 through TS / B 3.7-23	1
	Page TS / B 3.7-24	1
	Pages TS / B 3.7-25 and TS / B 3.7-26	0
	Pages TS / B 3.7-27 through TS / B 3.7-29	5
	Page TS / B 3.7-30	2
	Page TS / B 3.7-31	1
	Page TS / B 3.7-32	0
	Page TS / B 3.7-33	1
	Pages TS / B 3.7-34 through TS / B 3.7-37	0
B 3.8	ELECTRICAL POWER SYSTEMS BASES	
	Page TS / B 3.8-1	3
	Pages TS / B 3.8-2 and TS / B 3.8-3	2
	Page TS / B 3.8-4	3
	Pages TS / B 3.8-4a and TS / B 3.8-4b	0
	Page TS / B 3.8-5	5
	Page TS / B 3.8-6	3
	Pages TS / B 3.8-7 through TS/B 3.8-8	2
	Page TS / B 3.8-9	4
	Page TS / B 3.8-10	3
	Pages TS / B 3.8-11 and TS / B 3.8-17	2
	Page TS / B 3.8-18	3
	Pages TS / B 3.8-19 through TS / B 3.8-21	2
	Pages TS / B 3.8-22 and TS / B 3.8-23	3
	Pages TS / B 3.8-24 through TS / B 3.8-37	2
	Pages B 3.8-38 through B 3.8-44	0

SUSQUEHANNA STEAM ELECTRIC STATION
LIST OF EFFECTIVE SECTIONS (TECHNICAL SPECIFICATIONS BASES)

<u>Section</u>	<u>Title</u>	<u>Revision</u>
	Page TS / B 3.8-45	1
	Pages TS / B 3.8-46 through B 3.8-48	0
	Page TS / B 3.8-49	1
	Pages B 3.8-50 through B 3.8-53	0
	Pages TS / B 3.8-54 through TS / B 3.8-57	2
	Pages TS / B 3.8-58 through TS / B 3.8-61	3
	Pages TS / B 3.8-62 and TS / B 3.8-63	5
	Page TS / B 3.8-64	4
	Page TS / B 3.8-65	5
	Pages TS / B 3.8-66 through TS / B 3.8-77	1
	Pages TS / B 3.8-77A through TS / B 3.8-77C	0
	Pages B 3.8-78 through B 3.8-80	0
	Page TS / B 3.8-81	1
	Pages B 3.8-82 through B 3.8-90	0
B 3.9	REFUELING OPERATIONS BASES	
	Pages TS / B 3.9-1 and TS / B 3.9-1a	1
	Pages TS / B 3.9-2 through TS / B 3.9-4	1
	Pages B 3.9-5 through B 3.9-18	0
	Pages TS / B 3.9-19 through TS / B 3.9-21	1
	Pages B 3.9-22 through B 3.9-30	0
B 3.10	SPECIAL OPERATIONS BASES	
	Page TS / B 3.10-1	2
	Pages TS / B 3.10-2 through TS / B 3.10-5	1
	Pages B 3.10-6 through B 3.10-31	0
	Page TS / B 3.10-32	2
	Page B 3.10-33	0
	Page TS / B 3.10-34	1
	Pages B 3.10-35 and B 3.10-36	0
	Page TS / B 3.10-37	1
	Page TS / B 3.10-38	2

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3.6 CONTAINMENT SYSTEMS

B 3.6.4.2 Secondary Containment Isolation Valves (SCIVs)

BASES

BACKGROUND The function of the SCIVs, in combination with other accident mitigation systems, is to limit fission product release during and following postulated Design Basis Accidents (DBAs) (Ref. 1). Secondary containment isolation within the time limits specified for those isolation valves designed to close automatically ensures that fission products that leak from primary containment into secondary containment following a DBA, or that are released during certain operations when primary containment is not required to be OPERABLE or take place outside primary containment, are maintained within the secondary containment boundary.

The OPERABILITY requirements for SCIVs help ensure that an adequate secondary containment boundary is maintained during and after an accident by minimizing potential paths to the environment. These isolation devices consist of either passive devices or active (automatic) devices. Manual valves or dampers, de-activated automatic valves or dampers secured in their closed position (including check valves with flow through the valve secured), and blind flanges are considered passive devices.

Automatic SCIVs close on a secondary containment isolation signal to establish a boundary for untreated radioactive material within secondary containment following a DBA or other accidents.

Other non-sealed penetrations which cross a secondary containment boundary are isolated by the use of valves in the closed position or blind flanges.

APPLICABLE SAFETY ANALYSES The SCIVs must be OPERABLE to ensure the secondary containment barrier to fission product releases is established. The principal accidents for which the secondary containment boundary is required are a loss of coolant accident (Ref. 1) and a fuel handling accident inside secondary containment (Ref. 2). The secondary containment performs no active function in response to either of these limiting events, but the boundary

(continued)

BASES

APPLICABLE
SAFETY
ANALYSES
(continued)

established by SCIVs is required to ensure that leakage from the primary containment is processed by the Standby Gas Treatment (SGT) System before being released to the environment.

Maintaining SCIVs OPERABLE with isolation times within limits ensures that fission products will remain trapped inside secondary containment so that they can be treated by the SGT System prior to discharge to the environment.

SCIVs satisfy Criterion 3 of the NRC Policy Statement (Ref. 3).

LCO

SCIVs that form a part of the secondary containment boundary are required to be OPERABLE. Depending on the configuration of the secondary containment only specific SCIVs are required. The SCIV safety function is related to control of offsite radiation releases resulting from DBAs.

The automatic isolation valves are considered OPERABLE when their isolation times are within limits and the valves actuate on an automatic isolation signal. The valves covered by this LCO, along with their associated stroke times, are listed in Table B 3.6.4.2-1.

The normally closed isolation valves or blind flanges are considered OPERABLE when manual valves are closed or open in accordance with appropriate administrative controls, automatic SCIVs are deactivated and secured in their closed position, or blind flanges are in place. These passive isolation valves or devices are listed in Table B3.6.4.2-2. Penetrations closed with sealants are considered part of the secondary containment boundary and are not considered penetration flow paths.

APPLICABILITY

In MODES 1, 2, and 3, a DBA could lead to a fission product release to the primary containment that leaks to the secondary containment. Therefore, the OPERABILITY of SCIVs is required.

In MODES 4 and 5, the probability and consequences of these events are reduced due to pressure and temperature

(continued)

BASES

APPLICABILITY (continued) limitations in these MODES. Therefore, maintaining SCIVs OPERABLE is not required in MODE 4 or 5, except for other situations under which significant radioactive releases can be postulated, such as during operations with a potential for draining the reactor vessel (OPDRVs), during CORE ALTERATIONS, or during movement of irradiated fuel assemblies in the secondary containment. Moving irradiated fuel assemblies in the secondary containment may also occur in MODES 1, 2, and 3.

ACTIONS The ACTIONS are modified by three Notes. The first Note allows penetration flow paths to be unisolated intermittently under administrative controls. These controls consist of stationing a dedicated operator, who is in continuous communication with the control room, at the controls of the isolation device. In this way, the penetration can be rapidly isolated when a need for secondary containment isolation is indicated.

The second Note provides clarification that for the purpose of this LCO separate Condition entry is allowed for each penetration flow path. This is acceptable, since the Required Actions for each Condition provide appropriate compensatory actions for each inoperable SCIV. Complying with the Required Actions may allow for continued operation, and subsequent inoperable SCIVs are governed by subsequent Condition entry and application of associated Required Actions.

The third Note ensures appropriate remedial actions are taken, if necessary, if the affected system(s) are rendered inoperable by an inoperable SCIV.

A.1 and A.2

In the event that there are one or more required penetration flow paths with one required SCIV inoperable, the affected penetration flow path(s) must be isolated. The method of isolation must include the use of at least one isolation barrier that cannot be adversely affected by a single active failure. Isolation barriers that meet this criterion are a closed and de-activated automatic SCIV, a closed manual valve, and a blind flange. For penetrations isolated in

(continued)

BASES

ACTIONS A.1 and A.2 (continued)

accordance with Required Action A.1, the device used to isolate the penetration should be the closest available device to secondary containment. The Required Action must be completed within the 8 hour Completion Time. The specified time period is reasonable considering the time required to isolate the penetration, and the probability of a DBA, which requires the SCIVs to close, occurring during this short time is very low.

For affected penetrations that have been isolated in accordance with Required Action A.1, the affected penetration must be verified to be isolated on a periodic basis. This is necessary to ensure that secondary containment penetrations required to be isolated following an accident, but no longer capable of being automatically isolated, will be in the isolation position should an event occur. The Completion Time of once per 31 days is appropriate because the valves are operated under administrative controls and the probability of their misalignment is low. This Required Action does not require any testing or device manipulation. Rather, it involves verification that the affected penetration remains isolated.

Condition A is modified by a Note indicating that this Condition is only applicable to those penetration flow paths with two SCIVs. For penetration flow paths with one SCIV, Condition C provides the appropriate Required Actions.

Required Action A.2 is modified by a Note that applies to devices located in high radiation areas and allows them to be verified closed by use of administrative controls. Allowing verification by administrative controls is considered acceptable, since access to these areas is typically restricted. Therefore, the probability of misalignment, once they have been verified to be in the proper position, is low.

B.1

With two SCIVs in one or more penetration flow paths inoperable, the affected penetration flow path must be isolated within 4 hours. The method of isolation must

(continued)

BASES

ACTIONS B.1 (continued)

include the use of at least one isolation barrier that cannot be adversely affected by a single active failure. Isolation barriers that meet this criterion are a closed and de-activated automatic valve, a closed manual valve, and a blind flange. The 4 hour Completion Time is reasonable considering the time required to isolate the penetration and the probability of a DBA, which requires the SCIVs to close, occurring during this short time, is very low.

The Condition has been modified by a Note stating that Condition B is only applicable to penetration flow paths with two isolation valves. For penetration flow paths with one SCIV, Condition C provides the appropriate Required Actions.

C.1 and C.2

With one or more required penetration flow paths with one required SCIV inoperable, the inoperable valve must be restored to OPERABLE status or the affected penetration flow path must be isolated. The method of isolation must include the use of at least one isolation barrier that cannot be adversely affected by a single active failure. Isolation barriers that meet this criterion are a closed and de-activated automatic valve, a closed manual valve, and a blind flange. A check valve may not be used to isolate the affected penetration. Required Action C.1 must be completed within the 4 hour Completion Time. The Completion Time of 4 hours is reasonable considering the relative stability of the system (hence, reliability) to act as a penetration isolation boundary and the relative importance of supporting secondary containment OPERABILITY during MODES 1, 2, and 3.

In the event the affected penetration flow path is isolated in accordance with Required Action C.1, the affected penetration must be verified to be isolated on a periodic basis. This is necessary to ensure that secondary containment penetrations required to be isolated following an accident are isolated.

The Completion Time of once per 31 days for verifying each affected penetration is isolated is appropriate because the

(continued)

BASES

ACTIONS C.1 and C.2 (continued)

valves are operated under administrative controls and the probability of their misalignment is low.

Condition C is modified by a Note indicating that this Condition is only applicable to penetration flow paths with only one SCIV. For penetration flow paths with two SCIVs, Conditions A and B provide the appropriate Required Actions.

Required Action C.2 is modified by a Note that applies to valves and blind flanges located in high radiation areas and allows them to be verified by use of administrative means. Allowing verification by administrative means is considered acceptable, since access to these areas is typically restricted. Therefore, the probability of misalignment of these valves, once they have been verified to be in the proper position, is low.

D.1 and D.2

If any Required Action and associated Completion Time cannot be met, 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 12 hours and to MODE 4 within 36 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.

E.1, E.2, and E.3

If any Required Action and associated Completion Time are not met, the plant must be placed in a condition in which the LCO does not apply. If applicable, CORE ALTERATIONS and the movement of irradiated fuel assemblies in the secondary containment must be immediately suspended. Suspension of these activities shall not preclude completion of movement of a component to a safe position. Also, if applicable, actions must be immediately initiated to suspend OPDRVs in order to minimize the probability of a vessel draindown and the subsequent potential for fission product release. Actions must continue until OPDRVs are suspended.

(continued)

BASES

ACTIONS E.1, E.2, and E.3 (continued)

Required Action E.1 has been modified by a Note stating that LCO 3.0.3 is not applicable. If moving irradiated fuel assemblies while in MODE 4 or 5, LCO 3.0.3 would not specify any action. If moving fuel while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, in either case, inability to suspend movement of irradiated fuel assemblies would not be a sufficient reason to require a reactor shutdown.

SURVEILLANCE
REQUIREMENTS SR 3.6.4.2.1

This SR verifies that each secondary containment manual isolation valve and blind flange that is required to be closed during accident conditions is closed. The SR helps to ensure that post accident leakage of radioactive fluids or gases outside of the secondary containment boundary is within design limits. This SR does not require any testing or valve manipulation. Rather, it involves verification (typically visual) that those required SCIVs in secondary containment that are capable of being mispositioned are in the correct position.

Since these SCIVs are readily accessible to personnel during normal operation and verification of their position is relatively easy, the 31 day Frequency was chosen to provide added assurance that the SCIVs are in the correct positions.

Two Notes have been added to this SR. The first Note applies to valves and blind flanges located in high radiation areas and allows them to be verified by use of administrative controls. Allowing verification by administrative controls is considered acceptable, since access to these areas is typically restricted during MODES 1, 2, and 3 for ALARA reasons. Therefore, the probability of misalignment of these SCIVs, once they have been verified to be in the proper position, is low.

A second Note has been included to clarify that SCIVs that are open under administrative controls are not required to meet the SR during the time the SCIVs are open.

(continued)

BASES

SURVEILLANCE
REQUIREMENTS
(continued)

SR 3.6.4.2.2

SCIVs with maximum isolation times specified in Table B 3.6.2.4-1 are tested every 92 days to verify that the isolation time is within limits to demonstrate OPERABILITY. Automatic SCIVs without maximum isolation times specified in Table B 3.6.4.2-1 are tested under the requirements of SR 3.6.4.2.3. The isolation time test ensures that the SCIV will isolate in a time period less than or equal to that assumed in the safety analyses.

SR 3.6.4.2.3

Verifying that each automatic required SCIV closes on a secondary containment isolation signal is required to prevent leakage of radioactive material from secondary containment following a DBA or other accidents. This SR ensures that each automatic SCIV will actuate to the isolation position on a secondary containment isolation signal. The LOGIC SYSTEM FUNCTIONAL TEST in SR 3.3.6.2.5 overlaps this SR to provide complete testing of the safety function. The 24 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown these components usually pass the Surveillance when performed at the 24 month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

REFERENCES

1. FSAR, Section 6.2.
 2. FSAR, Section 15.
 3. Final Policy Statement on Technical Specifications Improvements, July 22, 1993 (58 FR 39132).
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Table B 3.6.4.2-1
Secondary Containment Ventilation System
Automatic Isolation Dampers
 (Page 1 of 1)

Reactor Building Zone	Valve Number	Valve Description	Type of Valve	Maximum Isolation Time (Seconds)
I	HD-17586 A&B	Supply System Dampers	Automatic Isolation Damper	10.0
I	HD-17524 A&B	Filtered Exhaust System Dampers	Automatic Isolation Damper	10.0
I	HD-17576A&B	Unfiltered Exhaust System Dampers	Automatic Isolation Damper	10.0
II	HD-27586 A&B	Supply System Dampers	Automatic Isolation Damper	10.0
II	HD-27524 A&B	Filtered Exhaust System Dampers	Automatic Isolation Damper	10.0
II	HD-27576 A&B	Unfiltered Exhaust System Dampers	Automatic Isolation Damper	10.0
III	HD-17564 A&B	Supply System Dampers	Automatic Isolation Damper	14.0
III	HD-17514 A&B	Filtered Exhaust System Dampers	Automatic Isolation Damper	6.5
III	HD-17502 A&B	Unfiltered Exhaust System Dampers	Automatic Isolation Damper	6.0
III	HD-27564 A&B	Supply System Dampers	Automatic Isolation Damper	14.0
III	HD-27514 A&B	Filtered Exhaust System Dampers	Automatic Isolation Damper	6.5
III	HD-27502 A&B	Unfiltered Exhaust System Dampers	Automatic Isolation Damper	6.0
N/A	HD-17534A	Zone 3 Airlock I-606	Automatic Isolation Damper	N/A
N/A	HD-17534B	Zone 3 Airlock I-611	Automatic Isolation Damper	N/A
N/A	HD-17534C	Zone 3 Airlock I-707	Automatic Isolation Damper	N/A
N/A	HD-17534D	Zone 3 Airlock I-803	Automatic Isolation Damper	N/A
N/A	HD-17534E	Zone 3 Airlock I-805	Automatic Isolation Damper	N/A
N/A	HD-17534F	Zone 3 Airlock I-617	Automatic Isolation Damper	N/A
N/A	HD-17534H	Zone 3 Airlock I-618	Automatic Isolation Damper	N/A
N/A	HD-27534A	Zone 3 Airlock II-606	Automatic Isolation Damper	N/A
N/A	HD-27534C	Zone 3 Airlock II-707	Automatic Isolation Damper	N/A
N/A	HD-27534D	Zone 3 Airlock II-803	Automatic Isolation Damper	N/A
N/A	HD-27534E	Zone 3 Airlock II-805	Automatic Isolation Damper	N/A
N/A	HD-27534G	Zone 3 Airlock C-806	Automatic Isolation Damper	N/A
N/A	HD-27534H	Zone 3 Airlock II-618	Automatic Isolation Damper	N/A
N/A	HD-27534I	Zone 3 Airlock II-609	Automatic Isolation Damper	N/A

Table B 3.6.4.2-2
 Secondary Containment Ventilation System
 Passive Isolation Valves or Devices
 (Page 1 of 2)

Device Number	Device Description	Area/Elev	Required Position
X-28-2-3000	Utility Penetration to Unit 1 East Stairwell	Yard/670	Blind Flanged
X-29-2-44	SDHR System to Fuel Pool Cooling	Yard/670	Blind Flanged
X-29-2-45	SDHR System to Fuel Pool Cooling	Yard/670	Blind Flanged
X-29-2-46	Temporary Chiller to RBCW	Yard/670	Blind Flanged
X-29-2-47	Temporary Chiller to RBCW	Yard/670	Blind Flanged
X-29-2-48	Utility Penetration to Unit 1 RR Bay	Yard/670	Capped
X-33-2-3000	Utility Penetration to Unit 2 East Stairwell	Yard/670	Blind Flanged
X-28-2-3000	Utility Penetration to Unit 1 East Stairwell	28/670	Blind Flanged
X-29-2-48	Utility Penetration to Unit 1 RR Bay	29/670	Capped
X-33-2-3000	Utility Penetration to Unit 2 East Stairwell	33/670	Blind Flanged
X-29-3-54	Utility Penetration to Unit 1 RBCCW Hx Area	27/683	Blind Flanged
X-29-3-55	Utility Penetration to Unit 1 RBCCW Hx Area	27/683	Blind Flanged
X-29-5-95	Temporary Chiller to Unit 1 RBCW	29/749	Blind Flanged
X-29-5-96	Temporary Chiller to Unit 1 RBCW	29/749	Blind Flanged
X-29-5-91	Temporary Chiller to Unit 2 RBCW	33/749	Blind Flanged
X-29-5-92	Temporary Chiller to Unit 2 RBCW	33/749	Blind Flanged
X-29-5-97	Utility Penetration from Unit 1 RR Bay to Unit 2 Elev. 749	33/749	Capped
X-27-6-42	Diamond Plate Cover over Floor Penetration	27/779'	Installed
X-27-6-92	Instrument Tubing Stubs	27/779'	Capped
X-29-7-4	1" Spare Conduit Threaded Plug	29/818'	Installed
X-30-6-72	Instrument Tubing Stubs	30/779'	Capped
X-30-6-1002	Stairwell #214 Rupture Disc	30/779'	Installed Intact
X-30-6-1003	Airlock II-609 Rupture Disc	30/779'	Installed Intact
X-25-6-1008	Airlock I-606 Rupture Disc	25/779'	Installed Intact
X-29-4-102	Penetration at Door 433	29/719'	Blind Flange Installed
X-29-4-103	Penetration at Door 433	29/719'	Blind Flange Installed
X-29-4-102	Penetration at Door 433	33/719'	Blind Flange Installed
X-29-4-103	Penetration at Door 433	33/719'	Blind Flange Installed
1S2104	N ₂ Purge Line to U1 Containment Spectacle Flange	29/683'	Blind Side Installed
2S2104	N ₂ Purge Line to U2 Containment Spectacle Flange	34/672'	Blind Side Installed
XD-17513	Isolation damper for Railroad Bay Zone III HVAC Supply	29/799'	Position is dependent on Railroad Bay alignment
XD-17514	Isolation damper for Railroad Bay Zone III HVAC Exhaust	29/719'	Position is dependent on Railroad Bay alignment
XD-12301	PASS Air Flow Damper	11/729'	Closed Damper
XD-22301	PASS Air Flow Damper	22/729'	Closed Damper
161827	HPCI Blowout Steam Vent Drain Valve	25/645'	Closed Manual Isolation Valve
161828	RCIC Blowout Steam Vent Drain Valve	28/645'	Closed Manual Isolation Valve
161829	'A' RHR Blowout Steam Vent Drain Valve	29/645'	Closed Manual Isolation Valve
161830	'B' RHR Blowout Steam Vent Drain Valve	28/645'	Closed Manual Isolation Valve
261820	RCIC Blowout Steam Vent Drain Valve	33/645'	Closed Manual Isolation Valve
261821	'A' RHR Blowout Steam Vent Drain Valve	34/645'	Closed Manual Isolation Valve
261822	'B' RHR Blowout Steam Vent Drain Valve	33/645'	Closed Manual Isolation Valve
187388	RBCW Temp Chiller Discharge Iso Vlv	29/670	Closed Manual Isolation Valve
187389	RBCW Temp Chiller Supply Iso Vlv	29/670	Closed Manual Isolation Valve

Table B 3.6.4.2-2
Secondary Containment Ventilation System
Passive Isolation Valves or Devices
 (Page 2 of 2)

Device Number	Device Description	Area/Elev	Required Position
187390	RBCW Temp Chiller Supply Drain Vlv	29/670	Closed Manual Isolation Valve
187391	RBCW Temp Chiller Discharge Drain Vlv	29/670	Closed Manual Isolation Valve
110176	SDHR Supply Drain Vlv	29/670	Closed Manual Isolation Valve
110186	SDHR Discharge Drain Vlv	29/670	Closed Manual Isolation Valve
110180	SDHR Supply Vent Vlv	29/749	Closed Manual Isolation Valve
110181	SDHR Discharge Fill Vlv	27/749	Closed Manual Isolation Valve
110182	SDHR Discharge Vent Vlv	27/749	Closed Manual Isolation Valve
110187	SDHR Supply Fill Vlv	29/749	Closed Manual Isolation Valve
210186	SDHR Supply Drain Vlv	33/749	Closed Manual Isolation Valve
210187	SDHR Supply Vent Vlv	33/749	Closed Manual Isolation Valve
210191	SDHR Discharge Vent Vlv	30/749	Closed Manual Isolation Valve
210192	SDHR Discharge Drain Vlv	30/749	Closed Manual Isolation Valve
210193	SDHR Discharge Vent Vlv	33/749	Closed Manual Isolation Valve