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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

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A001
NRC

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CATEGORY: DOCUMENTS TYPE: TSB1
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SSS MANUAL

Manual Name: TSBI

Manual Title: TECHNICAL SPECIFICATION BASES UNIT 1 MANUAL

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B 3.6 CONTAINMENT SYSTEMS

B 3.6.1.1 Primary Containment

BASES

BACKGROUND

The function of the primary containment is to isolate and contain fission products released from the Reactor Primary System following a Design Basis Loss of Coolant Accident and to confine the postulated release of radioactive material. The primary containment consists of a steel lined, reinforced concrete vessel, which surrounds the Reactor Primary System and provides an essentially leak tight barrier against an uncontrolled release of radioactive material to the environment.

The isolation devices for the penetrations in the primary containment boundary are a part of the containment leak tight barrier. To maintain this leak tight barrier:

- a. All penetrations required to be closed during accident conditions are either:
 1. capable of being closed by an OPERABLE automatic containment isolation system, or
 2. closed by manual valves, blind flanges, or de-activated automatic valves secured in their closed positions, except as provided in LCO 3.6.1.3, "Primary Containment Isolation Valves (PCIVs)";
- b. The primary containment air lock is OPERABLE, except as provided in LCO 3.6.1.2, "Primary Containment Air Lock"; and
- c. All equipment hatches are closed.

Several instruments connect to the primary containment atmosphere and are considered extensions of the primary containment. The leak rate tested instrument isolation valves identified in the Leakage Rate Test Program should be used as the primary containment boundary when the instruments are isolated and/or vented. Table B 3.6.1.1-1 contains the listing of the instruments and isolation valves.

(continued)

BASES

BACKGROUND
(continued)

The H₂O₂ Analyzer lines beyond the PCIVs, up to and including the components within the H₂O₂ Analyzer panels, are extensions of primary containment (i.e., closed system), and are required to be leak rate tested in accordance with the Leakage Rate Test Program. The H₂O₂ Analyzer closed system boundary is identified in the Leakage Rate Test Program, and consists of components, piping, tubing, fittings, and valves, which meet the design guidance of Reference 7. Within the H₂O₂ Analyzer panels, the boundary ends at the first normally closed valve. The closed system boundary between PASS and the H₂O₂ Analyzer system ends at the Seismic Category I boundary between the two systems. This boundary occurs at the process sampling solenoid operated isolation valves (SV-12361, SV-12365, SV-12366, SV-12368, and SV-12369). These solenoid operated isolation valves do not fully meet the guidance of Reference 7 for closed system boundary valves in that they are not powered from a Class 1E power source. Based upon a risk determination, operating these valves as closed system boundary valves is not risk significant. These normally closed valves are required to be leakage rate tested in accordance with the Leakage Rate Test Program, since they form part of the closed system boundary for the H₂O₂ Analyzers. These valves are "closed system boundary valves" and may be opened under administrative control, as delineated in Technical Requirements Manual (TRM) Bases 3.6.4. Opening of these valves to permit testing of PASS in Modes 1, 2, and 3 is permitted in accordance with TRO 3.6.4.

When the H₂O₂ Analyzer panels are isolated and/or vented, the panel isolation valves identified in the Leakage Rate Test Program should be used as the boundary of the extension of primary containment. Table B 3.6.1.1-2 contains a listing of the affected H₂O₂ Analyzer penetrations and panel isolation valves.

This Specification ensures that the performance of the primary containment, in the event of a Design Basis Accident (DBA), meets the assumptions used in the safety analyses of References 1 and 2. SR 3.6.1.1.1 leakage rate requirements are in conformance with 10 CFR 50, Appendix J, Option B and supporting documents (Ref. 3, 4 and 5), as modified by approved exemptions.

(continued)

BASES (continued)

APPLICABLE
SAFETY ANALYSES

The safety design basis for the primary containment is that it must withstand the pressures and temperatures of the limiting DBA without exceeding the design leakage rate.

The DBA that postulates the maximum release of radioactive material within primary containment is a LOCA. In the analysis of this accident, it is assumed that primary containment is OPERABLE such that release of fission products to the environment is controlled by the rate of primary containment leakage.

Analytical methods and assumptions involving the primary containment are presented in References 1 and 2. The safety analyses assume a nonmechanistic fission product release following a DBA, which forms the basis for determination of offsite based on an assumed leakage rate from the primary containment. OPERABILITY of the primary containment ensures that the leakage rate assumed in the safety analyses is not exceeded.

The maximum allowable leakage rate for the primary containment (L_a) is 1.0% by weight of the containment air per 24 hours at the design basis LOCA maximum peak containment pressure (P_a) of 48.6 psig.

Primary containment satisfies Criterion 3 of the NRC Policy Statement. (Ref. 6)

LCO

Primary containment OPERABILITY is maintained by limiting leakage to $\leq 1.0 L_a$, except prior to each startup after performing a required Primary Containment Leakage Rate Testing Program leakage test. At this time, applicable leakage limits must be met. Compliance with this LCO will ensure a primary containment configuration, including equipment hatches, that is structurally sound and that will limit leakage to those leakage rates assumed in the safety analyses.

Individual leakage rates specified for the primary containment air lock are addressed in LCO 3.6.1.2.

Leakage requirements for MSIVs and Secondary containment bypass are addressed in LCO 3.6.1.3.

(continued)

BASES (continued)

APPLICABILITY

In MODES 1, 2, and 3, a DBA could cause a release of radioactive material to primary containment. In MODES 4 and 5, the probability and consequences of these events are reduced due to the pressure and temperature limitations of these MODES. Therefore, primary containment is not required to be OPERABLE in MODES 4 and 5 to prevent leakage of radioactive material from primary containment.

ACTIONS

A.1

In the event primary containment is inoperable, primary containment must be restored to OPERABLE status within 1 hour. The 1 hour Completion Time provides a period of time to correct the problem commensurate with the importance of maintaining primary containment OPERABILITY during MODES 1, 2, and 3. This time period also ensures that the probability of an accident (requiring primary containment OPERABILITY) occurring during periods where primary containment is inoperable is minimal.

B.1 and B.2

If primary containment 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 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.

SURVEILLANCE
REQUIREMENTS

SR 3.6.1.1.1

Maintaining the primary containment OPERABLE requires compliance with the visual examinations and leakage rate test requirements of the Primary Containment Leakage Rate Testing Program. The primary containment concrete visual examinations may be performed during either power operation, e.g., performed concurrently with other primary containment inspection-related activities, or during a maintenance or refueling outage. The visual examinations of the steel liner plate inside primary containment are performed during maintenance or refueling outages since this is the only time the liner plate is fully accessible.

(continued)

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.6.1.1.1 (continued)

Failure to meet air lock leakage testing (SR 3.6.1.2.1) or resilient seal primary containment purge valve leakage testing (SR 3.6.1.3.6) does not necessarily result in a failure of this SR. The impact of the failure to meet these SRs must be evaluated against the Type A, B, and C acceptance criteria of the Primary Containment Leakage Rate Testing Program. As left leakage prior to each startup after performing a required leakage test is required to be $< 0.6 L_a$ for combined Type B and C leakage, and $\leq 0.75 L_a$ for overall Type A leakage. At all other times between required leakage rate tests, the acceptance criteria is based on an overall Type A leakage limit of $\leq 1.0 L_a$. At $\leq 1.0 L_a$ the offsite and control room dose consequences are bounded by the assumptions of the safety analysis. The Frequency is required by the Primary Containment Leakage Rate Testing Program.

SR Frequencies are as required by the Primary Containment Leakage Rate Testing Program. These periodic testing requirements verify that the primary containment leakage rate does not exceed the leakage rate assumed in the safety analysis.

As noted in table B 3.6.1.3-1, an exemption to Appendix J is provided that isolation barriers which remain water filled or a water seal remains in the line post-LOCA are tested with water and the leakage is not included in the Type B and C $0.60 L_a$ total.

SR 3.6.1.1.2

Maintaining the pressure suppression function of primary containment requires limiting the leakage from the drywell to the suppression chamber. Thus, if an event were to occur that pressurized the drywell, the steam would be directed through the downcomers into the suppression pool. This SR measures drywell to suppression chamber leakage to ensure that the leakage paths that would bypass the suppression pool are within allowable limits. The allowable limit is 10% of the acceptable SSES A/\sqrt{k} design valve. For SSES, the A/\sqrt{k} design value is $.0535 \text{ ft}^2$.

Satisfactory performance of this SR can be achieved by establishing a known differential pressure between the drywell and the suppression chamber and determining the leakage. The leakage test is performed when the 10 CFR 50, Appendix J, Type A test is performed in accordance with the Primary Containment Leakage Rate Testing Program. This testing Frequency was developed considering this test is performed in conjunction with the Integrated Leak rate test

(continued)

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.6.1.1.2 (continued)

and also in view of the fact that component failures that might have affected this test are identified by other primary containment SRs. Two consecutive test failures, however, would indicate unexpected primary containment degradation; in this event, as the Note indicates, increasing the Frequency to once every 24 months is required until the situation is remedied as evidenced by passing two consecutive tests.

SR 3.6.1.1.3

Maintaining the pressure suppression function of primary containment requires limiting the leakage from the drywell to the suppression chamber. Thus, if an event were to occur that pressurized the drywell, the steam would be directed through downcomers into the suppression pool. This SR measures suppression chamber-to-drywell vacuum breaker leakage to ensure the leakage paths that would bypass the suppression pool are within allowable limits. The total allowable leakage limit is 30% of the SR 3.6.1.1.2 limit. The allowable leakage per set is 12% of the SR 3.6.1.1.2 limit.

The leakage is determined by establishing a 4.3 psi differential pressure across the drywell-to-suppression chamber vacuum breakers and verifying the leakage. The leakage test is performed every 24 months. The 24 month Frequency was developed considering the surveillance must be performed during a unit outage. A Note is provided which allows this Surveillance not to be performed when SR 3.6.1.1.2 is performed. This is acceptable because SR 3.6.1.1.2 ensures the OPERABILITY of the pressure suppression function including the suppression chamber-to-drywell vacuum breakers.

REFERENCES

1. FSAR, Section 6.2.
2. FSAR, Section 15.
3. 10 CFR 50, Appendix J, Option B.
4. Nuclear Energy Institute, 94-01

(continued)

BASES

REFERENCES
(continued)

5. ANSI/ANS 56.8-1994
 6. Final Policy Statement on Technical Specifications
Improvements July 22, 1993 (58 FR 39132)
 7. Standard Review Plan 6.2.4, Rev. 1, September 1975
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TABLE B 3.6.1.1-1
INSTRUMENT ISOLATION VALVES
 (Page 1 of 2)

PENETRATION NUMBER	INSTRUMENT	INSTRUMENT ISOLATION VALVE
X-3B	PSH-C72-1N002A	IC-PSH-1N002A
	PSH L C72-1N004	IC-PSHL-1N004
	PS-E11-1N010A	IC-PS-1N010A
	PS-E11-1N011A	IC-PS-1N011A
	PSH-C72-1N002B	IC-PSH-1N002B
	PS-E11-1N010C	IC-PS-1N010C
	PS-E11-1N011C	IC-PS-1N011C
	PSH-15120C	IC-PSH-15120C
X-32A	PSH-C72-1N002D	IC-PSH-1N002D
	PS-E11-1N010B	IC-PS-1N010B
	PS-E11-1N011B	IC-PS-1N011B
	PSH-C72-1N002C	IC-PSH-1N002C
	PS-E11-1N010D	IC-PS-1N010D
	PS-E11-1N011D	IC-PS-1N011D
	PSH-15120D	IC-PSH-15120D
X-39A	FT-15120A	IC-FT-15120A HIGH and IC-FT-15120A LOW
X-39B	FT-15120B	IC-FT-15120B HIGH and IC-FT-15120B LOW
X-90A	PT-15709A	IC-PT-15709A
	PT-15710A	IC-PT-15710A
	PT-15728A	IC-PT-15728A
X-90D	PT-15709B	IC-PT-15709B
	PT-15710B	IC-PT-15710B
	PT-15728B	IC-PT-15728B

TABLE B 3.6.1.1-1
INSTRUMENT ISOLATION VALVES
 (Page 2 of 2)

PENETRATION NUMBER	INSTRUMENT	INSTRUMENT ISOLATION VALVE
X-204A/205A	FT-15121A	IC-FT-15121A HIGH and IC-FT-15121A LOW
X-204B/205B	FT-15121B	IC-FT-15121B HIGH and IC-FT-15121B LOW
X-219A	LT-15775A	IC-LT-15775A REF and IC-LT-15775A VAR
	LSH-E41-1N015A	155027 and 155031
	LSH-E41-1N015B	155029 and 155033
X-223A	PT-15702	IC-PT-15702
X-232A	LT-15776A	IC-LT-15776A REF and IC-LT-15776A VAR
	PT-15729A	IC1-PT-15729A
	LI-15776A2	IC-LI-15776A2 REF and IC-LI-15776A2 VAR
X234A	LT-15775B	IC-LT-15775B REF and IC-LT-15775B VAR
X-235A	LT-15776B	IC-LT-15776B REF and IC-LT-15776B VAR
	PT-15729B	IC1-PT-15729B

TABLE B 3.6.1.1-2
H₂O₂ ANALYZER PANEL ISOLATION VALVES

PENETRATION NUMBER	PANEL ISOLATION VALVE ^(a)
X-60A, X-88B, X-221A, X-238A	157138 157139 157140 157141 157142
X-80C, X-233, X-238B	157149 157150 157151 157152 157153

(a) Only those valves listed in this table with current leak rate test results, as identified in the Leakage Rate Test Program, may be used as isolation valves.