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NL-13-1434

Docket Nos.: 50-321
50-366

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555-0001

Edwin I. Hatch Nuclear Plant
Application for Technical Specification Change to Revise Action Statements for
Inoperable Control Room Air Conditioning Subsystems

Ladies and Gentlemen:

In accordance with the provisions of 10 CFR 50.90 Southern Nuclear Operating Company (SNC) is submitting a request for an amendment to the Technical Specifications (TS) for Edwin I. Hatch Nuclear Plant (HNP), Units 1 and 2.

The proposed amendment would revise Technical Specification 3.7.5, Control Room Air Conditioning (AC) System, to provide new Required Actions (RAs) for one, two, or three main control room (MCR) AC subsystems inoperable, and make other required corresponding changes. The RA Completion Times (CTs) for two or three MCR AC subsystems inoperable are revised to be dependent upon the MCR area temperature, instead of being dependent upon the outside air temperature. The revised Technical Specifications RAs and CTs for one or three MCR AC subsystems inoperable are consistent with the corresponding Condition's RAs and CTs in Technical Specification Task Force (TSTF) change traveler TSTF-477, Revision 3, "Add Action for Two Inoperable Control Room AC Subsystems." HNP has three 50% capacity AC subsystems versus the two 100% capacity AC subsystems assumed in NUREG-1433. Because of this difference, the revised HNP Technical Specifications for two MCR AC subsystems inoperable represent a Condition not explicitly addressed by TSTF-477, Revision 3. The revised RAs and CTs for two MCR AC subsystems inoperable are consistent with the RAs and CTs from TSTF-477, Revision 3 for zero operable MCR AC subsystems, except that the HNP CT for restoration of a subsystem is modified appropriately based on HNP's less challenging condition. Conditions for the Limiting Condition for Operation (LCO) not being met during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs are also modified or added which are consistent with TSTF-477, Revision 3.

Enclosure 1 provides a description of the proposed change. Enclosure 2 provides the existing TS pages marked up to show the proposed change. Enclosure 3 provides revised (clean) TS pages. Enclosure 4 provides the existing TS Bases pages marked up to show the proposed change in accordance with 10 CFR 50.36(a).

SNC requests approval of the proposed license amendment by January 15, 2015, with the amendment being implemented within 90 days.

In accordance with 10 CFR 50.91, a copy of this application, with enclosures, is being provided to the designated Georgia state official.

This letter contains no NRC commitments. If you have any questions, please contact Ken McElroy at (205) 992-7369.

Mr. C. R. Pierce states he is Regulatory Affairs Director of Southern Nuclear Operating Company, is authorized to execute this oath on behalf of Southern Nuclear Operating Company and, to the best of his knowledge and belief, the facts set forth in this letter are true.

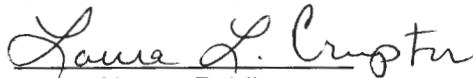
Respectfully submitted,



C. R. Pierce
Regulatory Affairs Director

CRP/RMJ

Sworn to and subscribed before me this 16 day of January, 2014.



Laura L. Cropper
Notary Public

My commission expires: 10/8/17

Enclosure: 1. Description and Assessment
 2. Marked up Technical Specification Changes
 3. Revised Technical Specification Pages
 4. Marked up Existing TS Bases Changes

cc: Southern Nuclear Operating Company
 Mr. S. E. Kuczynski, Chairman, President & CEO
 Mr. D. G. Bost, Executive Vice President & Chief Nuclear Officer
 Mr. D. R. Vineyard, Vice President – Hatch
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 RType: CHA02.004

U. S. Nuclear Regulatory Commission
Mr. V. M. McCree, Regional Administrator
Mr. R. E. Martin, NRR Senior Project Manager – Hatch
Mr. E. D. Morris, Senior Resident Inspector – Hatch

State of Georgia
Mr. J. H. Turner, Environmental Director Protection Division

**Edwin I. Hatch Nuclear Plant
Application for Technical Specification Change to Revise Action Statements for
Inoperable Control Room Air Conditioning Subsystems**

Enclosure 1

Description and Assessment

1.0 Description

The Edwin I. Hatch Nuclear Plant (HNP) Technical Specification (TS) 3.7.5, Control Room Air Conditioning (AC) System, for Unit 1 and Unit 2 is revised to provide new Required Actions (RAs) for one, two, or three main control room (MCR) AC subsystems inoperable, and make other required corresponding changes. The RAs and Completion Times (CTs) for two or three MCR AC subsystems inoperable are revised to be dependent upon the MCR area temperature. The current RAs and CTs for one or two inoperable MCR AC subsystems inoperable are dependent upon the outside air temperature, while the current RA for three inoperable MCR AC subsystems inoperable requires immediate entry into LCO 3.0.3. The revised TS RAs and CTs for one or three MCR AC subsystems inoperable are consistent with those for the corresponding Condition's RAs and CTs in Technical Specification Task Force (TSTF) change traveler TSTF-477, Revision 3, "Add Action for Two Inoperable Control Room AC Subsystems." The availability of this change traveler was published in the Federal Register on March 26, 2007 as part of the consolidated line item improvement process (CLIIP). HNP has three 50% capacity subsystems versus the two 100% capacity subsystems assumed in NUREG-1433. Because of this difference, the revised TS for two MCR AC subsystems inoperable represent a Condition not explicitly addressed by TSTF-477, Revision 3. As such, HNP is proposing a site-specific license amendment request (LAR). The revised RAs and CTs for two MCR AC subsystems inoperable are consistent with the RAs and CTs from TSTF-477, Revision 3 for zero operable MCR AC subsystems, except that the HNP CT for restoration of a subsystem is modified appropriately based on HNP's less challenging condition. Conditions for the LCO not being met during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs are also modified or added that are consistent with TSTF-477, Revision 3. With the exception of the MCR AC subsystem differences discussed, this LAR is patterned directly from TSTF-477, Revision 3.

2.0 Proposed Change

The following TS changes are proposed to Section 3.7.5 of the HNP Unit 1 and Unit 2 TS:

- Combine current Conditions A and B by deleting the option to operate indefinitely with one MCR AC subsystem inoperable if outside air temperature is less than or equal to 65°F. SNC requests to revise the CTs such that they are not directly dependent upon the outside air temperature.
- Revise new Condition B (current Condition C) so that the RAs and CTs align with TSTF-477, Revision 3. However, as noted above, the STS that were revised in TSTF-477, Revision 3 assume two 100% capacity control room AC subsystems, whereas HNP has three 50% capacity MCR AC subsystems. Therefore, in proposed Condition B (two control room AC subsystems inoperable), the STS would have no control room AC subsystems in operation, while HNP would still have one 50% capacity MCR AC subsystem in operation. Based on this difference, HNP is requesting seven days to restore one MCR AC subsystem to OPERABLE status instead of the 72 hours given in TSTF-477, Revision 3.
- Add Condition C for three control room AC subsystems inoperable with RAs and CTs that align with the similar Condition from TSTF-477, Revision 3 (Condition B). In both the new HNP Condition C (three control room AC subsystems inoperable) and the TSTF-477, Revision 3 Condition B (two control room AC subsystems inoperable) there are zero OPERABLE subsystems. The RAs and CTs for proposed HNP Condition C and for TSTF-477, Revision 3 Condition B are therefore consistent.

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- Revise Condition D to include Conditions A, B, or C. Revised Condition D is similar to Condition C from TSTF-477, Revision 3.
- Revise Condition E to align with Condition D in TSTF-477, Revision 3.
- Add new Condition F that is consistent with Condition E in TSTF-477, Revision 3. In both the proposed HNP Condition F and in Condition E in TSTF-477, Revision 3, less than 100% cooling capacity is available during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs. The RAs and CTs are therefore consistent.
- Delete current Conditions F and G. These Conditions are no longer necessary based on the changes discussed above.

The Bases are revised to reflect the changes to the Specification.

3.0 Background

The Main Control Room Air Conditioning System (hereafter referred to as the MCR AC System) provides temperature control for the MCR following activation of the Main Control Room Environmental Control (MCREC) system. The MCR AC provides cooling for the MCR during normal plant operation.

The MCR AC System consists of three 50% capacity subsystems that provide cooling of MCR supply air. Each subsystem consists of an air handling unit (AHU) (i.e., direct expansion cooling coils and fan), water cooled condensing units, refrigerant compressors, ductwork, dampers, and instrumentation and controls to provide for MCR temperature control. The train oriented condensing units receive cooling water from the divisionalized Plant Service Water System.

The MCR AC System is designed to provide a habitable condition under both normal and accident conditions. Two subsystems provide the required temperature for maintaining a suitable MCR temperature for a sustained occupancy. The design conditions for the MCR is 72-79 °F and < 75% relative humidity. The design basis of the MCR AC System is to maintain the MCR temperature for a 30 day continuous occupancy. During emergency operation (accident condition), the MCR AC System is credited in maintaining a habitable condition, and ensures the OPERABILITY of components in the MCR.

4.0 Technical Analysis

A survey of BWR plants determined that the Technical Specifications of all of the BWR/6 plants (Grand Gulf, River Bend, Clinton, and Perry) contain an Action for two [control room AC] subsystems inoperable that allows 7 days to restore an inoperable system and requires verification that the MCR temperature is within a temperature limit every 4 hours. As stated in TSTF-477, Rev. 3, the BWR/6 plant's Actions are also applicable to the non-BWR/6 plants. There are no significant design or operational differences between the BWR/4 and BWR/6 control room air conditioning systems. There are no differences in the BWR/4 or BWR/6 accident analysis assumptions in regards to the control room air conditioning system. Therefore, it is inferred that there should be no difference in the TS requirements for these systems.

Both the BWR/4 STS (NUREG-1433) and the BWR/6 STS (NUREG-1434) assume two 100% capacity control room AC subsystems. The HNP MCR AC system (which is common to both Units 1 and 2) consists of three 50% capacity subsystems. With outside temperature $\leq 65^{\circ}\text{F}$, analysis has shown that only one MCR AC subsystem is needed to provide sufficient cooling

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capacity in maintaining the design basis 105°F equipment limit that is listed in the current TS Bases. However, SNC is revising the TS requirements such that the RA CTs are directly dependent upon the temperature in the MCR instead of the outside air temperature.

The requirement to monitor MCR temperature ensures the environment for the MCR equipment is maintained within the design limits. Provided that MCR temperature is maintained within the design limits, 7 days is allowed to restore one MCR AC subsystem in the event that two MCR AC subsystems are inoperable. In this Condition, HNP still has one operable MCR AC subsystem available. The 7 day CT is reasonable considering that MCR temperature is being maintained within limits, considering the low probability of an event occurring that would require MCR isolation, and considering that there will still be one MCR AC subsystem OPERABLE. In the event that three MCR AC subsystems are inoperable, 72 hours is allowed to restore one subsystem to OPERABLE status, provided that MRC temperature is maintained within the design limits. The 72 hour CT is reasonable considering that MCR temperature is being maintained within limits and considering the low probability of an event occurring that would require MCR isolation.

TSTF-477-A, Revision 3 discusses Topical Report NEDC 31336 PA, and states:

Topical Report NEDC 31336 PA, "General Electric Instrument Setpoint Methodology," states that the error allowance for control room in-cabinet temperatures is 40-104 degrees F for BWR/6 plants and 40 to 156 degrees F for BWR/4 plants. The qualified life of the panel components (as an example, Rosemount 710 DU trip units) is dependent on the continuous ambient temperature at the installation site, from a maximum life of over 30 years for approximately 95 degree temperatures to just over two years for continuous ambient temperatures over 150 degrees. The temperature rise in closed control room trip panels is 14 to 18 degrees. With control room temperature controlled at less than 90 degrees, the maximum control room panel temperature would be less than the qualification temperature and would be within the temperature assumed in the setpoint accuracy calculations. This Traveler does not change the equipment qualification temperature in the control room. Therefore, the equipment enclosed in the cabinets is unaffected by this change.

The model Safety Evaluation for TSTF-477, Revision 3 states:

Maintaining the CR Temperature < 90 degrees assures that the Safety Related Equipment in the CR will remain within the original licensed design operating temperature, because the maximum allowable CR Temperature is unchanged by TSTF-477. The NRC staff finds that the proposed changes in TSTF-477 are acceptable for the BWR/4 because the TSTF-477 changes provide TS requirements that the CR Temperature will be maintained within the original licensed design operating temperature of the CR equipment or the plant will be placed in the Cold Shutdown Mode (Mode 4, Safe Shutdown Condition).

Although HNP is proposing a site-specific license amendment request, the regulatory precedent and technical justifications provided in TSTF-477, Revision 3 regarding the adequacy of maintaining MCR temperature < 90 °F with less than 100% MCR AC cooling available (including the reference to NEDC 31336 PA and the model Safety Evaluation) are applicable to HNP.

In the event that the RA CTs are not met for Conditions A, B, or C during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or

during OPDRVs, Conditions are added or modified which are consistent with the corresponding Conditions from TSTF-477, Revision 3.

5.0 Regulatory Analysis

5.1 No Significant Hazards Consideration

SNC has evaluated whether or not a significant hazards consideration is involved with the proposed generic change by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

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

Response: No.

The proposed change allows 7 days to restore an inoperable Main Control Room Air Conditioning (MCR AC) subsystem when two subsystems are inoperable and allows 72 hours to restore an inoperable MCR AC subsystem when three subsystems are inoperable, provided MCR temperature is verified every four hours to be less than 90°F. The new Required Action Completion Times are revised to be dependent upon the MCR temperature, instead of being dependent upon the outside air temperature. The option to operate indefinitely with one MCR AC subsystem inoperable provided the outside area temperature is less than 65°F is being deleted.

In the event that new Conditions A, B, or C are not met during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs, Conditions E and F are modified and added, respectively, to state Required Actions and Completion Times. These Required Actions include immediate suspension of the current activity as necessary. As a result of these changes, current Conditions F and G are no longer necessary and are deleted.

The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed). The design basis equipment temperature limit of the control room equipment is not affected. Future changes to the Bases or licensee controlled document will be evaluated pursuant to the requirements of 10 CFR 50.59, "Changes, test and experiments", to ensure that such changes do not result in more than a minimal increase in the probability or consequences of an accident previously evaluated.

The proposed changes do not adversely affect accident initiators or precursors nor alter the design assumptions, conditions, and configuration of the facility or the manner in which the plant is operated and maintained. The proposed changes do not adversely affect the ability of structures, systems and components (SSCs) to perform their intended safety function to mitigate the consequences of an initiating event within the assumed acceptance limits. The proposed changes do not affect the source term, containment isolation, or radiological consequences of any accident previously evaluated. Further, the proposed changes do not increase the types and the amounts of radioactive effluent that may be released, nor significantly increase individual or cumulative occupation/public radiation exposures.

Therefore, the changes do not involve a significant increase in the probability or consequences of any accident previously evaluated.

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

Response: No.

The proposed change allows 7 days to restore an inoperable Main Control Room Air Conditioning (MCR AC) subsystem when two subsystems are inoperable and allows 72 hours to restore an inoperable MCR AC subsystem when three subsystems are inoperable, provided MCR temperature is verified every four hours to be less than 90°F. The new Required Action Completion Times are revised to be dependent upon the MCR temperature, instead of being dependent upon the outside air temperature. The option to operate indefinitely with one MCR AC subsystem inoperable provided the outside area temperature is less than 65°F is being deleted.

In the event that new Conditions A, B, or C are not met during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs, Conditions E and F are modified and added, respectively, to state Required Actions and Completion Times. These Required Actions include immediate suspension of the current activity as necessary. As a result of these changes, current Conditions F and G are no longer necessary and are deleted.

The changes do not involve a physical altering of the plant (i.e., no new or different type of equipment will be installed) or a change in methods governing normal plant operation. The requirements in the TS continue to require maintaining the control room temperature within the design limits.

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

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

The proposed change allows 7 days to restore an inoperable Main Control Room Air Conditioning (MCR AC) subsystem when two subsystems are inoperable and allows 72 hours to restore an inoperable MCR AC subsystem when three subsystems are inoperable, provided MCR temperature is verified every four hours to be less than 90°F. The new Required Action Completion Times are revised to be dependent upon the MCR temperature, instead of being dependent upon the outside air temperature. The option to operate indefinitely with one MCR AC subsystem inoperable provided the outside area temperature is less than 65°F is being deleted.

In the event that new Conditions A, B, or C are not met during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs, Conditions E and F are modified and added, respectively, to state Required Actions and Completion Times. These Required Actions include immediate suspension of the current activity as necessary. As a result of these changes, current Conditions F and G are no longer necessary and are deleted.

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Instituting the proposed changes will continue to maintain the control room temperature within design limits. Should it appear that control room temperature may exceed the design basis 105°F equipment limit based on the control room temperature reaching 90°F in Modes 1, 2, or 3, the plant will be placed in the Cold Shutdown Mode (Mode 4). If the control room heatup is rapid, then the plant will be required to be placed in Mode 3 and in Mode 4 with a Completion Time that is similar to the current requirements. If the control room heatup is relatively slow (and the design basis equipment temperature is therefore less likely to be reached), longer time will be allowed to place the plant in Mode 3 and in Mode 4 (if necessary). Changes to the Bases or license controlled document are performed in accordance with 10 CFR 50.59. This approach provides an effective level of regulatory control and ensures that the control room temperature will be maintained within design limits.

The proposed changes maintain sufficient controls to preserve the current margins of safety. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, SNC concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

5.2 Applicable Regulatory Requirements/Criteria

The operability requirements of the MCR AC system have not changed. The regulatory requirements do not specifically address Completion Times with inoperable systems. As a result, the regulatory requirements and criteria are not affected by the proposed change.

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the approval of the proposed change will not be inimical to the common defense and security or to the health and safety of the public.

6.0 Environmental Consideration

A review has determined that the proposed change would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed change does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed change.

7.0 References

- 1.0 TSTF-477-A, Revision 3, "Adding an Action Statement for Two Inoperable Control Room Air Conditioning Subsystems."
- 2.0 Nuclear Regulatory Commission Notice of Availability Concerning Technical Specification Improvement To Add an Action Statement for Two Inoperable Control Room Air

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Conditioning Subsystems to the Technical Specifications Using the Consolidated Line Item Improvement Process, Federal Register Vol. 72, No. 57

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Statements for Inoperable Control Room Air Conditioning Subsystems**

Enclosure 2

Marked up Technical Specification Changes

3.7 PLANT SYSTEMS

3.7.5 Control Room Air Conditioning (AC) System

LCO 3.7.5 Three control room AC subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,
During movement of irradiated fuel assemblies in the secondary containment,
During CORE ALTERATIONS,
During operations with a potential for draining the reactor vessel (OPDRVs).

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One control room AC subsystem inoperable.	A.1 Verify outside air temperature $\leq 65^{\circ}\text{F}$.	1 hour AND Once per 12 hours thereafter
	A.2 Verify maximum outside air temperature in the previous 24 hours $\leq 65^{\circ}\text{F}$.	1 hour
BA. Required Action and associated Completion Time of Condition A not met. One control room AC subsystem inoperable	BA.1 Restore control room AC subsystem to OPERABLE status.	30 days

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p><u>CB</u>. Two control room AC subsystems inoperable.</p>	<p><u>CB.1</u> Verify <u>control room area temperature < 90°F, outside air temperature ≤ 65°F.</u></p> <p><u>AND</u></p> <p><u>C.2</u> Verify maximum outside air temperature in the previous 24 hours ≤ 65°F.</p> <p><u>AND</u></p> <p><u>CB.32</u> Restore one control room AC subsystem to OPERABLE status.</p>	<p><u>Once per 4 hours. 4 hour</u></p> <p><u>AND</u></p> <p><u>Once per 12 hours thereafter</u></p> <p><u>1 hour</u></p> <p><u>30-7 days</u></p>
<p><u>C.</u> <u>Three control room AC subsystems inoperable.</u></p>	<p><u>C.1</u> <u>Verify control room area temperature < 90°F</u></p> <p><u>AND</u></p> <p><u>C.2</u> <u>Restore one control room AC subsystem to OPERABLE status.</u></p>	<p><u>Once per 4 hours</u></p> <p><u>72 hours</u></p>
<p>D. Required Action and associated Completion Time of Condition <u>A</u>, <u>B</u>, or C not met in MODE 1, 2, or 3.</p>	<p>D.1 Be in MODE 3.</p> <p><u>AND</u></p> <p>D.2 Be in MODE 4.</p>	<p>12 hours</p> <p>36 hours</p>

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>E. Required Action and associated Completion Time of Condition B or C not met during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.</p>	<p>-----NOTE----- LCO 3.0.3 is not applicable. -----</p> <p>E.1 Place necessary OPERABLE control room AC subsystems in operation.</p> <p><u>OR</u></p> <p>E.2.1 Suspend movement of irradiated fuel assemblies in the secondary containment.</p> <p><u>AND</u></p> <p>E.2.2 Suspend CORE ALTERATIONS.</p> <p><u>AND</u></p> <p>E.2.3 Initiate action to suspend OPDRVs.</p>	<p>Immediately</p> <p>Immediately</p> <p>Immediately</p> <p>Immediately</p>
<p><u>F. Required Action and associated Completion Time of Condition B or C not met during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.</u></p>	<p>-----NOTE----- <u>LCO 3.0.3 is not applicable.</u> -----</p> <p><u>F.1 Suspend movement of irradiated fuel assemblies in the secondary containment.</u></p> <p><u>AND</u></p> <p><u>F.2 Suspend CORE ALTERATIONS.</u></p> <p><u>AND</u></p> <p><u>F.3 Initiate action to suspend OPDRVs.</u></p>	<p><u>Immediately</u></p> <p><u>Immediately</u></p> <p><u>Immediately</u></p>

3.7 PLANT SYSTEMS

3.7.5 Control Room Air Conditioning (AC) System

LCO 3.7.5 Three control room AC subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,
During movement of irradiated fuel assemblies in the secondary containment,
During CORE ALTERATIONS,
During operations with a potential for draining the reactor vessel (OPDRVs).

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One control room AC subsystem inoperable.	A.1 Verify outside air temperature $\leq 65^{\circ}\text{F}$.	1 hour <u>AND</u> Once per 12 hours thereafter
	<u>AND</u> A.2 Verify maximum outside air temperature in the previous 24 hours $\leq 65^{\circ}\text{F}$.	1 hour
<u>BA. Required Action and associated Completion Time of Condition A not met. One control room AC subsystem inoperable</u>	<u>BA.1</u> Restore control room AC subsystem to OPERABLE status.	30 days

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p><u>GB.</u> Two control room AC subsystems inoperable.</p>	<p><u>GB.1</u> Verify <u>control room area temperature < 90°F.</u> <u>outside air temperature ≤ 65°F.</u></p> <p><u>AND</u></p> <p><u>C.2</u> Verify maximum outside air temperature in the previous 24 hours ≤ 65°F.</p> <p><u>AND</u></p> <p><u>GB.32</u> Restore one control room AC subsystem to OPERABLE status.</p>	<p><u>Once per 4 hours.</u> <u>4 hour</u></p> <p><u>AND</u></p> <p><u>Once per 12 hours thereafter</u></p> <p><u>4 hour</u></p> <p><u>30-7 days</u></p>
<p><u>C.</u> <u>Three control room AC subsystems inoperable.</u></p>	<p><u>C.1</u> <u>Verify control room area temperature < 90°F</u></p> <p><u>AND</u></p> <p><u>C.2</u> <u>Restore one control room AC subsystem to OPERABLE status.</u></p>	<p><u>Once per 4 hours</u></p> <p><u>72 hours</u></p>
<p>D. Required Action and associated Completion Time of Condition <u>A</u>, <u>B</u>, or C not met in MODE 1, 2, or 3.</p>	<p>D.1 Be in MODE 3.</p> <p><u>AND</u></p> <p>D.2 Be in MODE 4.</p>	<p>12 hours</p> <p>36 hours</p>

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>E. Required Action and associated Completion Time of Condition B or C not met during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.</p>	<p>-----NOTE----- LCO 3.0.3 is not applicable. -----</p> <p>E.1 Place necessary OPERABLE control room AC subsystems in operation.</p> <p><u>OR</u></p> <p>E.2.1 Suspend movement of irradiated fuel assemblies in the secondary containment.</p> <p><u>AND</u></p> <p>E.2.2 Suspend CORE ALTERATIONS.</p> <p><u>AND</u></p> <p>E.2.3 Initiate action to suspend OPDRVs.</p>	<p>Immediately</p> <p>Immediately</p> <p>Immediately</p> <p>Immediately</p>
<p><u>F. Required Action and associated Completion Time of Condition B or C not met during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.</u></p>	<p>-----NOTE----- <u>LCO 3.0.3 is not applicable.</u> -----</p> <p><u>E.1 Suspend movement of irradiated fuel assemblies in the secondary containment.</u></p> <p><u>AND</u></p> <p><u>E.2 Suspend CORE ALTERATIONS.</u></p> <p><u>AND</u></p> <p><u>E.3 Initiate action to suspend OPDRVs.</u></p>	<p><u>Immediately</u></p> <p><u>Immediately</u></p> <p><u>Immediately</u></p>

<p>F. Three control room AC subsystems inoperable in MODE 1, 2, or 3.</p>	<p>F.1 Enter LCO 3.0.3.</p>	<p>Immediately</p>
<p>G. Three control room AC subsystems inoperable during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.</p>	<p style="text-align: center;"><u>NOTE</u> LCO 3.0.3 is not applicable.</p> <hr/> <p>G.1 Suspend movement of irradiated fuel assemblies in the secondary containment.</p> <p><u>AND</u></p> <p>G.2 Suspend CORE ALTERATIONS.</p> <p><u>AND</u></p> <p>G.3 Initiate actions to suspend OPDRVs.</p>	<p>Immediately</p> <p>Immediately</p> <p>Immediately</p>

**Edwin I. Hatch Nuclear Plant
Application for Technical Specification Change to Revise Action
Statements for Inoperable Control Room Air Conditioning Subsystems**

Enclosure 3

Revised Technical Specification Changes

3.7 PLANT SYSTEMS

3.7.5 Control Room Air Conditioning (AC) System

LCO 3.7.5 Three control room AC subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,
During movement of irradiated fuel assemblies in the secondary containment,
During CORE ALTERATIONS,
During operations with a potential for draining the reactor vessel (OPDRVs).

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One control room AC subsystem inoperable.	A.1 Restore control room AC subsystem to OPERABLE status.	30 days
B. Two control room AC subsystems inoperable.	B.1 Verify control room area temperature < 90°F.	Once per 4 hours
	<u>AND</u> B.2 Restore one control room AC subsystem to OPERABLE status.	7 days
C. Three control room AC subsystems inoperable.	C.1 Verify control room area temperature < 90°F.	Once per 4 hours
	<u>AND</u> C.2 Restore one control room AC subsystem to OPERABLE status.	72 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>D. Required Action and associated Completion Time of Condition A, B, or C not met in MODE 1, 2, or 3.</p>	<p>D.1 Be in MODE 3. <u>AND</u> D.2. Be in MODE 4.</p>	<p>12 hours 36 hours</p>
<p>E. Required Action and associated Completion Time of Condition A not met during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.</p>	<p>-----NOTE----- LCO 3.0.3 is not applicable. -----</p> <p>E.1 Place OPERABLE control room AC subsystems in operation. <u>OR</u> E.2.1 Suspend movement of irradiated fuel assemblies in the secondary containment. <u>AND</u> E.2.2 Suspend CORE ALTERATIONS. <u>AND</u> E.2.3 Initiate action to suspend OPDRVs.</p>	<p>Immediately Immediately Immediately Immediately</p>

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>F. Required Action and associated Completion Time of Condition B or C not met during movement of irradiated fuel assemblies in the secondary containment during CORE ALTERATIONS, or during OPDRVs.</p>	<p>-----NOTE----- LCO 3.0.3 is not applicable. -----</p> <p>F.1 Suspend movement of irradiated fuel assemblies in the secondary containment.</p> <p><u>AND</u></p> <p>F.2 Suspend CORE ALTERATIONS.</p> <p><u>AND</u></p> <p>F.3 Initiate actions to suspend OPDRVs.</p>	<p>Immediately</p> <p>Immediately</p> <p>Immediately</p>

3.7 PLANT SYSTEMS

3.7.5 Control Room Air Conditioning (AC) System

LCO 3.7.5 Three control room AC subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,
During movement of irradiated fuel assemblies in the secondary containment,
During CORE ALTERATIONS,
During operations with a potential for draining the reactor vessel (OPDRVs).

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One control room AC subsystem inoperable.	A.1 Restore control room AC subsystem to OPERABLE status.	30 days
B. Two control room AC subsystems inoperable.	B.1 Verify control room area temperature < 90°F.	Once per 4 hours
	<u>AND</u> B.2 Restore one control room AC subsystem to OPERABLE status.	7 days
C. Three control room AC subsystems inoperable.	C.1 Verify control room area temperature < 90°F.	Once per 4 hours
	<u>AND</u> C.2 Restore one control room AC subsystem to OPERABLE status.	72 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>D. Required Action and associated Completion Time of Condition A, B, or C not met in MODE 1, 2, or 3.</p>	<p>D.1 Be in MODE 3. <u>AND</u> D.2. Be in MODE 4.</p>	<p>12 hours 36 hours</p>
<p>E. Required Action and associated Completion Time of Condition A not met during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.</p>	<p>-----NOTE----- LCO 3.0.3 is not applicable. -----</p> <p>E.1 Place OPERABLE control room AC subsystems in operation. <u>OR</u> E.2.1 Suspend movement of irradiated fuel assemblies in the secondary containment. <u>AND</u> E.2.2 Suspend CORE ALTERATIONS. <u>AND</u> E.2.3 Initiate action to suspend OPDRVs.</p>	<p>Immediately Immediately Immediately Immediately</p>

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME	
<p>F. Required Action and associated Completion Time of Condition B or C not met during movement of irradiated fuel assemblies in the secondary containment during CORE ALTERATIONS, or during OPDRVs.</p>	<p>-----NOTE----- LCO 3.0.3 is not applicable. -----</p>		
	<p>F.1 Suspend movement of irradiated fuel assemblies in the secondary containment.</p>		<p>Immediately</p>
	<p><u>AND</u></p>		
	<p>F.2 Suspend CORE ALTERATIONS.</p>		<p>Immediately</p>
<p><u>AND</u></p>			
<p>F.3 Initiate actions to suspend OPDRVs.</p>	<p>Immediately</p>		

**Edwin I. Hatch Nuclear Plant
Application for Technical Specification Change to Revise Action
Statements for Inoperable Control Room Air Conditioning Subsystems**

Enclosure 4

Marked up Existing TS Bases Changes

BASES

APPLICABILITY
(continued)

Room AC System OPERABLE is not required in MODE 4 or 5, except for the following situations under which significant radioactive releases can be postulated:

- a. 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;
- b. During CORE ALTERATIONS; and
- c. During operations with a potential for draining the reactor vessel (OPDRVs).

ACTIONS

A.1 and A.2

~~With one control room AC subsystem inoperable, the outside air temperature must be verified to be $\leq 65^{\circ}\text{F}$ within 1 hour and the maximum outside air temperature in the previous 24 hours must be verified to be $\leq 65^{\circ}\text{F}$ within 1 hour. With temperature $\leq 65^{\circ}\text{F}$, analysis has shown that only one control room AC subsystem is needed to meet the design basis 105°F equipment limit. Thus, since there are still two OPERABLE control room AC subsystems, (and the single failure criterion is maintained), operation may continue provided outside air temperature remains $\leq 65^{\circ}\text{F}$. The 1 hour Completion Times allow a reasonable period of time to verify the outside air temperature. The 12 hour periodic Completion Time ensures the operators are aware of the outside air temperature and any changes to the outside air temperature, which could change the number of control room AC subsystems needed to meet the design basis equipment limiting temperature.~~

BA.1

~~With one control room AC subsystem inoperable and the outside air temperature not within the limitations of Required Actions A.1 and A.2, the inoperable control room AC subsystem must be restored to OPERABLE status within 30 days. With the unit in this condition, the remaining OPERABLE control room AC subsystems are adequate to perform the control room air conditioning function. However, the overall reliability is reduced because a single failure in an OPERABLE subsystem could result in loss of the control room air conditioning~~

(continued)

BASES

ACTIONS

BA.1 (continued)

function. The 30 day Completion Time is based on the low probability of an event occurring requiring control room isolation and, the consideration that the remaining subsystems can provide the required protection.

C.1, C.2, and C.3B.1 and B.2

With two control room AC subsystems inoperable, the Control Room AC System may not be capable of performing its intended function. Therefore, the control room area temperature is required to be monitored to ensure that temperature is being maintained such that equipment in the control room is not adversely affected. With the control room temperature being maintained within the temperature limit, 7 days is allowed to restore a Control Room AC subsystem to OPERABLE status. This Completion time is reasonable considering that the control room temperature is being maintained within limits, the availability of the remaining OPERABLE control room AC subsystem, and the low probability of an event occurring requiring control room isolation. Alternate methods of maintaining control room temperature, such as non-safety grade air conditioning systems or fans, can also be used to maintain control room temperature. the outside air temperature must be verified to be $\leq 65^{\circ}\text{F}$ within 1 hour and the maximum outside air temperature in the previous 24 hours must be verified to be $\leq 65^{\circ}\text{F}$ within 1 hour. With temperature $\leq 65^{\circ}\text{F}$, analysis has shown that only one control room AC subsystem is needed to meet the design basis. Thus, with the unit in this condition, the remaining OPERABLE control room AC subsystem is adequate to perform the control room air conditioning function. However, the overall reliability is reduced because a single failure in the OPERABLE subsystem could result in loss of the control room air conditioning function. Therefore, one inoperable control room AC subsystem must be restored to OPERABLE status within 30 days. The 30 day Completion time is based on the low probability of an event occurring requiring control room isolation, the consideration that the remaining subsystem can provide the required protection.

C.1 and C.2

With three control room AC subsystems inoperable, the Control Room AC System may not be capable of performing its intended function. Therefore, the control room area temperature is required to be monitored to ensure that temperature is being maintained such that equipment in the control room is not adversely affected. With the

(continued)

control room temperature being maintained within the temperature limit, 72 hours is allowed to restore a Control Room AC subsystem to OPERABLE status. This Completion time is reasonable considering that the control room temperature is being maintained within limits and the low probability of an event occurring requiring control room isolation. Alternate methods of maintaining control room temperature, such as non-safety grade air conditioning systems or fans, can also be used to maintain control room temperature.

D.1 and D.2

In MODE 1, 2, or 3, with any Required Action and associated Completion Time of Condition A, B, or C not met, the unit must be placed in a MODE that minimizes risk. To achieve this status, the unit must be placed in at least MODE 3 within 12 hours and in MODE 4 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

E.1, E.2.1, E.2.2, and E.2.3

The Required Actions of Condition E are modified by a Note indicating that LCO 3.0.3 does not apply. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, inability to suspend movement of irradiated fuel assemblies is not sufficient reason to require a reactor shutdown.

(continued)

BASES

ACTIONS

E.1, E.2.1, E.2.2, and E.2.3 (continued)

During movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs, if any Required Action and associated Completion Time for Condition ~~B or CA~~ is not met, the ~~necessary~~ OPERABLE control room AC subsystems may be placed immediately in operation. ~~One operable control room AC subsystem is necessary if the outside air temperature is $\leq 65^{\circ}\text{F}$ and the maximum outside air temperature in the previous 24 hours has been $\leq 65^{\circ}\text{F}$. If both of these conditions are not met, then two OPERABLE control room AC subsystems are necessary.~~ This action ensures that the remaining subsystems are OPERABLE, that no failures that would prevent actuation will occur, and that any active failure will be readily detected.

An alternative to Required Action E.1 is to immediately suspend activities that present a potential for releasing radioactivity that might require isolation of the control room. This places the unit in a condition that minimizes risk.

If applicable, CORE ALTERATIONS and movement of irradiated fuel assemblies in the secondary containment must be suspended immediately. Suspension of these activities shall not preclude completion of movement of a component to a safe position. Also, if applicable, action must be initiated immediately to suspend OPDRVs to minimize the probability of a vessel draindown and subsequent potential for fission product release. Actions must continue until the OPDRVs are suspended.

F.1, F.2, and F.3

The Required Actions of Condition F are modified by a Note indicating that LCO 3.0.3 does not apply. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, inability to suspend movement of irradiated fuel assemblies is not a sufficient reason to require a reactor shutdown.

During movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs, if Required Actions B.1 and B.2 or Required Actions C.1 and C.2 cannot be met within the required Completion Times, action must be taken to immediately suspend activities that present a potential for releasing radioactivity that might require protection of the control room operators. This places the unit in a condition that minimizes risk.

If applicable, CORE ALTERATIONS and movement of irradiated fuel assemblies in the secondary containment must be suspended

(continued)

immediately. Suspension of these activities shall not preclude completion of movement of a component to a safe position. Also, if applicable, action must be initiated immediately to suspend OPDRVs to minimize the probability of a vessel draindown and subsequent potential for fission product release. Actions must continue until the OPDRVs are suspended.

F.1

~~If three control room AC subsystems are inoperable in MODE 1, 2, or 3, the Control Room AC System may not be capable of performing the intended function. Therefore, LCO 3.0.3 must be entered immediately.~~

G.1, G.2, and G.3

~~The Required Actions of Condition G are modified by a Note indicating that LCO 3.0.3 does not apply. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, inability to suspend movement of irradiated fuel assemblies is not a sufficient reason to require a reactor shutdown.~~

(continued)

BASES

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

~~During movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs, with three control room AC subsystems inoperable, action must be taken immediately to suspend activities that present a potential for releasing radioactivity that might require isolation of the control room. This places the unit in a condition that minimizes risk.~~

~~If applicable, CORE ALTERATIONS and handling of irradiated fuel in the secondary containment must be suspended immediately. Suspension of these activities shall not preclude completion of movement of a component to a safe position. Also, if applicable, action must be initiated immediately to suspend OPDRVs to minimize the probability of a vessel draindown and subsequent potential for fission product release. Actions must continue until the OPDRVs are suspended.~~

SURVEILLANCE
REQUIREMENTS

SR 3.7.5.1

This SR verifies that the heat removal capability of the system is sufficient to remove the control room heat load assumed in the safety analysis. The SR consists of a combination of testing and calculation. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

REFERENCES

1. FSAR, Sections 6.4 and 9.4.1.
2. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.
3. Technical Requirements Manual, Table T2.1-1.

BASES

APPLICABILITY
(continued)

Room AC System OPERABLE is not required in MODE 4 or 5, except for the following situations under which significant radioactive releases can be postulated:

- a. 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;
- b. During CORE ALTERATIONS; and
- c. During operations with a potential for draining the reactor vessel (OPDRVs).

ACTIONS

A.1 and A.2

~~With one control room AC subsystem inoperable, the outside air temperature must be verified to be $\leq 65^{\circ}\text{F}$ within 1 hour and the maximum outside air temperature in the previous 24 hours must be verified to be $\leq 65^{\circ}\text{F}$ within 1 hour. With temperature $\leq 65^{\circ}\text{F}$, analysis has shown that only one control room AC subsystem is needed to meet the design basis 105°F equipment limit. Thus, since there are still two OPERABLE control room AC subsystems, (and the single failure criterion is maintained), operation may continue provided outside air temperature remains $\leq 65^{\circ}\text{F}$. The 1 hour Completion Times allow a reasonable period of time to verify the outside air temperature. The 12 hour periodic Completion Time ensures the operators are aware of the outside air temperature and any changes to the outside air temperature, which could change the number of control room AC subsystems needed to meet the design basis equipment limiting temperature.~~

BA.1

~~With one control room AC subsystem inoperable and the outside air temperature not within the limitations of Required Actions A.1 and A.2, the inoperable control room AC subsystem must be restored to OPERABLE status within 30 days. With the unit in this condition, the remaining OPERABLE control room AC subsystems are adequate to perform the control room air conditioning function. However, the overall reliability is reduced because a single failure in an OPERABLE subsystem could result in loss of the control room air conditioning~~

(continued)

BASES

ACTIONS

BA.1 (continued)

function. The 30 day Completion Time is based on the low probability of an event occurring requiring control room isolation and, the consideration that the remaining subsystems can provide the required protection.

C.1, C.2, and C.3B.1 and B.2

With two control room AC subsystems inoperable, the Control Room AC System may not be capable of performing its intended function. Therefore, the control room area temperature is required to be monitored to ensure that temperature is being maintained such that equipment in the control room is not adversely affected. With the control room temperature being maintained within the temperature limit, 7 days is allowed to restore a Control Room AC subsystem to OPERABLE status. This Completion time is reasonable considering that the control room temperature is being maintained within limits, the availability of the remaining OPERABLE control room AC subsystem, and the low probability of an event occurring requiring control room isolation. Alternate methods of maintaining control room temperature, such as non-safety grade air conditioning systems or fans, can also be used to maintain control room temperature. ~~the outside air temperature must be verified to be $\leq 65^{\circ}\text{F}$ within 1 hour and the maximum outside air temperature in the previous 24 hours must be verified to be $\leq 65^{\circ}\text{F}$ within 1 hour. With temperature $\leq 65^{\circ}\text{F}$, analysis has shown that only one control room AC subsystem is needed to meet the design basis. Thus, with the unit in this condition, the remaining OPERABLE control room AC subsystem is adequate to perform the control room air conditioning function. However, the overall reliability is reduced because a single failure in the OPERABLE subsystem could result in loss of the control room air conditioning function. Therefore, one inoperable control room AC subsystem must be restored to OPERABLE status within 30 days. The 30 day Completion time is based on the low probability of an event occurring requiring control room isolation, the consideration that the remaining subsystem can provide the required protection.~~

C.1 and C.2

With three control room AC subsystems inoperable, the Control Room AC System may not be capable of performing its intended function. Therefore, the control room area temperature is required to be monitored to ensure that temperature is being maintained such that equipment in the control room is not adversely affected. With the

(continued)

control room temperature being maintained within the temperature limit, 72 hours is allowed to restore a Control Room AC subsystem to OPERABLE status. This Completion time is reasonable considering that the control room temperature is being maintained within limits and the low probability of an event occurring requiring control room isolation. Alternate methods of maintaining control room temperature, such as non-safety grade air conditioning systems or fans, can also be used to maintain control room temperature.

D.1 and D.2

In MODE 1, 2, or 3, with any Required Action and associated Completion Time of Condition A, B, or C not met, the unit must be placed in a MODE that minimizes risk. To achieve this status, the unit must be placed in at least MODE 3 within 12 hours and in MODE 4 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

E.1, E.2.1, E.2.2, and E.2.3

The Required Actions of Condition E are modified by a Note indicating that LCO 3.0.3 does not apply. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, inability to suspend movement of irradiated fuel assemblies is not sufficient reason to require a reactor shutdown.

(continued)

BASES

ACTIONS

E.1, E.2.1, E.2.2, and E.2.3 (continued)

During movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs, if ~~any~~ Required Action and associated Completion Time for Condition ~~B or C~~ A is not met, the ~~necessary~~ OPERABLE control room AC subsystems may be placed immediately in operation. ~~One operable control room AC subsystem is necessary if the outside air temperature is $\leq 65^{\circ}\text{F}$ and the maximum outside air temperature in the previous 24 hours has been $\leq 65^{\circ}\text{F}$. If both of these conditions are not met, then two OPERABLE control room AC subsystems are necessary.~~ This action ensures that the remaining subsystems are OPERABLE, that no failures that would prevent actuation will occur, and that any active failure will be readily detected.

An alternative to Required Action E.1 is to immediately suspend activities that present a potential for releasing radioactivity that might require isolation of the control room. This places the unit in a condition that minimizes risk.

If applicable, CORE ALTERATIONS and movement of irradiated fuel assemblies in the secondary containment must be suspended immediately. Suspension of these activities shall not preclude completion of movement of a component to a safe position. Also, if applicable, action must be initiated immediately to suspend OPDRVs to minimize the probability of a vessel draindown and subsequent potential for fission product release. Actions must continue until the OPDRVs are suspended.

F.1, F.2, and F.3

The Required Actions of Condition F are modified by a Note indicating that LCO 3.0.3 does not apply. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, inability to suspend movement of irradiated fuel assemblies is not a sufficient reason to require a reactor shutdown.

During movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs, if Required Actions B.1 and B.2 or Required Actions C.1 and C.2 cannot be met within the required Completion Times, action must be taken to immediately suspend activities that present a potential for releasing radioactivity that might require protection of the control room operators. This places the unit in a condition that minimizes risk.

If applicable, CORE ALTERATIONS and movement of irradiated fuel assemblies in the secondary containment must be suspended

(continued)

immediately. Suspension of these activities shall not preclude completion of movement of a component to a safe position. Also, if applicable, action must be initiated immediately to suspend OPDRVs to minimize the probability of a vessel draindown and subsequent potential for fission product release. Actions must continue until the OPDRVs are suspended.

F.1

~~If three control room AC subsystems are inoperable in MODE 1, 2, or 3, the Control Room AC System may not be capable of performing the intended function. Therefore, LCO 3.0.3 must be entered immediately.~~

G.1, G.2, and G.3

~~The Required Actions of Condition G are modified by a Note indicating that LCO 3.0.3 does not apply. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, inability to suspend movement of irradiated fuel assemblies is not a sufficient reason to require a reactor shutdown.~~

(continued)

BASES

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

~~During movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs, with three control room AC subsystems inoperable, action must be taken immediately to suspend activities that present a potential for releasing radioactivity that might require isolation of the control room. This places the unit in a condition that minimizes risk.~~

~~If applicable, CORE ALTERATIONS and handling of irradiated fuel in the secondary containment must be suspended immediately. Suspension of these activities shall not preclude completion of movement of a component to a safe position. Also, if applicable, action must be initiated immediately to suspend OPDRVs to minimize the probability of a vessel draindown and subsequent potential for fission product release. Actions must continue until the OPDRVs are suspended.~~

SURVEILLANCE
REQUIREMENTS

SR 3.7.5.1

This SR verifies that the heat removal capability of the system is sufficient to remove the control room heat load assumed in the safety analysis. The SR consists of a combination of testing and calculation. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

REFERENCES

1. FSAR, Sections 6.4 and 9.4.1.
2. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.
3. Technical Requirements Manual, Table T2.1-1.