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TALEN ENERGY

JUL 2 7 2016

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

10 CFR 50.90

SUSQUEHANNA STEAM ELECTRIC STATION
PROPOSED AMENDMENT REQUEST TO ADDRESS
SECONDARY CONTAINMENT ACCESS OPENINGS
PLA-7486

Docket No. 50-387
and 50-388

Pursuant to 10 CFR 50.90, Susquehanna Nuclear, LLC, hereby requests approval of the following proposed amendment to the Susquehanna Steam Electric Station (SSES) Unit 1 and Unit 2 Technical Specification (TS). The proposal affects TS 3.6.4.1 "Secondary Containment," Surveillance Requirement (SR) 3.6.4.1.3 to provide an allowance for brief, inadvertent, simultaneous opening of redundant Secondary Containment access doors during normal entry and exit conditions.

As demonstrated in the enclosed evaluation, the proposed amendment does not involve a significant hazard consideration.

Enclosure 1 provides an evaluation of the proposed changes, a description of the proposed change, the requested confirmation of applicability, and No Significant Hazards Consideration. Attachment 1 provides the existing TS pages marked up to show the proposed changes. Attachment 2 provides the existing TS Bases pages marked up to show the proposed changes, for information only. Attachment 3 contains final revisions of the affected TS pages.

Approval of the proposed amendment is requested by February 29th, 2017. Once approved, the amendment shall be implemented within 60 days.

There are no regulatory commitments associated with these proposed changes.

The need for this change has been discussed with the SSES NRC Project Manager. Additionally, the change has been reviewed by the SSES Plant Operations Review Committee (PORC) and by the Nuclear Safety Review Board (NSRB).

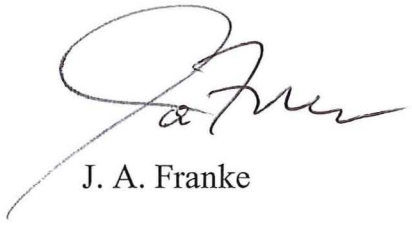
In accordance with 10 CFR 50.91(b), Susquehanna Nuclear, LLC is providing the Commonwealth of Pennsylvania with a copy of this proposed License Amendment request.

If you have any questions or require additional information, please contact Mr. Jason Jennings at (570) 542-3155.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: July 27, 2016

Sincerely,



J. A. Franke

Included Documents:

Enclosure 1	Evaluation of Proposed Changes
Attachment 1	Markups of Existing Technical Specifications
Attachment 2	Markups of Existing Technical Specification Bases, Information Only
Attachment 3	Revised Technical Specifications

Copy: NRC Region I
Mr. J. E. Greives, NRC Sr. Resident Inspector
Ms. T. E. Hood, NRC Project Manager
Mr. M. Shields, PA DEP/BRP

Enclosure 1 to PLA-7486

Susquehanna Nuclear, LLC Evaluation of Proposed Changes to Unit 1 and Unit 2 Technical Specification 3.6.4.1 "Secondary Containment," Surveillance Requirement 3.6.4.1.3

SUSQUEHANNA NUCLEAR, LLC EVALUATION

Subject: **UNIT 1 AND UNIT 2 CHANGES TO TECHNICAL SPECIFICATION SECTION 3.6.4.1**

1. SUMMARY DESCRIPTION

The proposed change revises Technical Specifications (TS) 3.6.4.1, "Secondary Containment," Surveillance Requirement (SR) 3.6.4.1.3 to provide an allowance for brief, inadvertent, simultaneous opening of redundant Secondary Containment access doors during normal entry and exit conditions. The frequencies of surveillance will be controlled in accordance with the Surveillance Frequency Control Program (SFCP).

2. DETAILED DESCRIPTION

The proposed change addresses issues related to Secondary Containment access openings. The Secondary Containment is a single-train system that performs a safety function. There is no redundant train or system that can perform the Secondary Containment function should the Secondary Containment be inoperable.

NUREG-1022, Revision 3, "Event Report Guidelines 10 CFR 50.72 and 50.73," discusses the reporting criteria contained in 10 CFR 50.72 and 50.73. The discussion of 50.72(b)(3)(v) and 50.73(a)(2)(v), "Any event or condition that could have prevented the fulfillment of the safety function," states, "There are a limited number of single-train systems that perform safety functions (e.g., the HPCI system in BWRs). For such systems, inoperability of the single train is reportable even though the plant TS may allow such a condition to exist for a limited time."

Failure to meet the SRs of TS 3.6.4.1 at any point requires declaring Secondary Containment inoperable. This reporting requirement has resulted in numerous Licensee Event Reports (LERs) in the last several years despite the fact that in a vast majority of cases Secondary Containment was restored to operable status quickly (i.e., much less than the specified four hour Completion Time). These events cause an unnecessary burden to the licensee and NRC staff, since the events do not impact safety or the ability of Secondary Containment to perform its design function.

The purpose of the proposed change is to permit brief, inadvertent, simultaneous opening of both the inner and outer Secondary Containment access opening door during normal entry and exit conditions. These simultaneous openings exist for several seconds at most and do not impact the ability of Secondary Containment to perform its design function. The statement "except when the access opening is being used for entry and exit." will be added to the SR description in the TS document. The bases documents are revised to clarify that

momentary simultaneous opening of access openings with 2 doors for personnel entry and exit is permitted.

The reporting requirements in 10 CFR 50.72 and 50.73 require prompt NRC notification and submittal of a LER whenever the Secondary Containment is declared inoperable, regardless of the length of time of the inoperability or whether Secondary Containment could still fulfill its safety function. To address this situation, the changes described herein are proposed in order to allow Secondary Containment to be operable during brief circumstances in which both doors are opened.

SRs on the affected pages will be updated to be controlled in accordance with the SFCP. In 2014, SSES submitted a License Amendment Request (LAR) to the NRC requesting adoption of TSTF-425, Rev 3, which would transfer control of certain SR frequencies to the licensee. Approval to adopt TSTF-425 was granted by the NRC on 05/20/16[7]. A period of 180 days was requested by SSES to allow for TSTF-425 implementation. Therefore, this request is written in a manner that reflects use of the SFCP.

3. TECHNICAL EVALUATION

NUREG-1434 BWR 6 guidance [4] for SR 3.6.4.1.3 contains an example of the proposed change. An exception for both doors in an access opening to be opened simultaneously for normal entry and exit is specified. This allowance is reasonable because the doors are under the continuous control of the person(s) accessing the doors, and the doors will be promptly closed following entry or exit, restoring the Secondary Containment boundary.

Surveillance requirements for Susquehanna allow the opening of only one Secondary Containment door at a time when Secondary Containment is required to be operable. Should both doors be inadvertently opened simultaneously, the proposed exception in the SR of "being used for entry and exit" ensures that the time that both doors may be open is limited to the time it takes to traverse through a door. Brief, simultaneous opening of Secondary Containment access doors is acceptable due to the low probability of an event that requires Secondary Containment during the short time in which the Secondary Containment access doors are open.

The intent of the proposed change is to allow for brief, inadvertent, simultaneous opening of redundant Secondary Containment access doors during normal entry and exit. The proposed change does not involve planned or extended simultaneous opening of redundant Secondary Containment access doors. For situations that involve planned simultaneous opening of the doors, Secondary Containment will be declared inoperable and the appropriate TS action will be followed in accordance with the existing TS requirements.

The TS SRs require verification that at least one door is closed in each Secondary Containment access opening. The intent of these requirements is to not breach Secondary Containment at any time when Secondary Containment is required operable. Therefore, when required operable, Secondary Containment access doors are normally kept closed, except when the access doors are being used for entry and exit.

There are many doors in a nuclear power plant that are credited as barriers, such as fire doors, security doors, flooding doors, high energy line break doors, control room doors, and Secondary Containment doors. Administrative controls are applied to these types of doors and the person using the door is responsible for opening and closing the door securely and for not keeping the door open any longer than necessary for entry. Under the proposed change, Secondary Containment doors will be treated in a manner similar to other barrier doors.

4. REGULATORY SAFETY ANALYSIS

4.1 Applicable Regulatory Requirements / Criteria

SSES FSAR Sections 3.1 and 3.13 provide detailed discussion of SSES compliance with the applicable regulatory requirements and guidance. The proposed TS amendment:

(a) Does not alter the design or function of any reactivity control system;
(b) Does not result in any change in the qualifications of any component; and
(c) Does not result in the reclassification of any component's status in the areas of shared, safety related, independent, redundant, and physically or electrically separated.

10CFR50 Requirements:

Title 10 of the Code of Federal Regulations (10CFR), Section 50.36. "Technical Specifications," in which the Commission established its regulatory requirements related to the contents of the TS. Specifically, 10CFR50.36(c)(2) states, in part, "limiting conditions for operation are the lowest functional capability or performance levels of equipment required for safe operation of the facility." 10CFR50.36(c)(3) states, "Surveillance requirements are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met."

The proposed change to the Secondary Containment SR does not affect compliance with these regulations.

General Design Criteria:

The following applicable General Design Criteria (GDC) for the Secondary Containment requires that the Secondary Containment to be design and maintained so that offsite doses remain below the regulatory guidelines.

GDC 16 – Containment Design

The proposed changes will maintain offsite and control room doses below regulatory limits. The changes represent actions that either do not impact Secondary Containment integrity or are conditions in which Secondary Containment integrity can be recovered in a relatively short time frame and therefore will have an insignificant impact on the dose consequences.

Note that GDC 41, 42 and 43 pertain to the Standby Gas Treatment System (SGTS) but do not specifically pertain to Secondary Containment integrity.

Applicable Regulatory Guides:

There are no Regulatory Guides that apply specifically to Secondary Containment. Regulatory Guide 1.183 allows crediting Secondary Containment in the dose analysis but does not provide specific design requirements. Regulatory Guide 1.52 is applicable to SGTS which supports Secondary Containment and is discussed below.

Regulatory Guide 1.52:

Regulatory Guide 1.52 is titled "Design, Testing, and Maintenance Criteria for Engineered-Safety Feature Atmosphere Cleanup Air Filtration and Adsorption Units of Light-Water-Cooled Nuclear Power Plants." Regulatory Guide 1.52 addresses the atmosphere cleanup system, including the various components and ductwork, in a postulated design basis radiological accident environment.

The proposed change does not alter the design of Secondary Containment or its ability to establish an essentially leak tight barrier against the uncontrolled release of radioactivity. Conformance with GDC 16, 41, 42, and 43, as well as conformance with Regulatory Guide 1.52 are not affected by the proposed change.

Thus, the proposed changes do not change the conformance with the above General Design Criteria and regulatory guidance.

4.2 Precedence

The proposed change is consistent with the improved standard technical specifications endorsed by the NRC in NUREG-1434, Standard Technical Specifications – General Electric BWR/6 Plants, Revision 4 [4]. Furthermore, very similar changes have been approved by the NRC for other licensees such as Limerick Generating Station and Peach Bottom Atomic Power Station. [5,6]

4.3 No Significant Hazards Consideration

1. **Do the proposed changes involve a significant increase in the probability or consequences of an accident previously evaluated?**

Response: No. The proposed change does not involve any physical change to structures, systems, or components (SSCs) and do not alter the method of operation of any SSCs. The proposed change addresses a temporary condition during which Secondary Containment SRs are not met. The Secondary Containment is not an initiator of any accident previously evaluated. As a result, the probability of any accident previously evaluated is not increased. The consequences of an accident previously evaluated while utilizing the proposed changes are not impacted and are bounded by the existing design bases calculations and analyses. As a result, the consequences of an accident previously evaluated are not significantly increased.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. **Do the proposed changes create the possibility of a new or different kind of accident from any accident previously evaluated?**

Response: No. The proposed change does not involve a physical alteration of any plant equipment. No new equipment is being introduced, and installed equipment is not being operated in a new or different manner. There are not setpoints, at which protective or mitigative actions are initiated, affected by the proposed change. The proposed change does not alter the manner in which equipment operation is initiated, nor will the function of credited equipment be changed. No alterations in the procedures that ensure the plant remains within analyzed limits are being proposed, and no changes are being made to the procedures relied upon to respond to an off-normal event described in the FSAR. As such, no new failure modes are being introduced. The change does not alter the assumptions made in the safety analysis and licensing basis.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. **Do the proposed changes involve a significant reduction in a margin of safety?**

Response: No. The margin of safety is established through equipment design, operating parameters, and the setpoints at which automatic actions are initiated. The proposed change addresses temporary conditions during which the Secondary Containment SR is not met. The allowance for both an inner and outer Secondary Containment access door to be open simultaneously for entry and exit does not affect the safety function of the reactor enclosure and refuel area Secondary Containments as the doors are promptly closed after entry of exit, thereby restoring the Secondary Containment boundary. In addition, brief, inadvertent simultaneous opening and closing of redundant Secondary Containment personnel access doors during normal entry and exit conditions does not affect the ability of the SGTS to establish the required Secondary Containment vacuum. Therefore, the safety function of the Secondary Containment is not affected.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, Susquehanna Nuclear, LLC concludes that the proposed changes do not involve a 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. ENVIRONMENTAL CONSIDERATION

10 CFR 51.22(c)(9) identifies certain licensing and regulatory actions which are eligible for categorical exclusion from the requirement to perform an environmental assessment. A proposed amendment to an operating license for a facility does not require an environmental assessment if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant hazards consideration; (2) result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite; or (3) result in a significant increase in individual or cumulative occupational radiation exposure.

As demonstrated in the "No Significant Hazards Consideration" evaluation, the proposed amendment does not involve a significant hazards consideration. There is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite. There is no significant increase in individual or cumulative occupational radiation exposure.

Susquehanna Nuclear, LLC has evaluated the proposed change and has determined that the proposed change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Accordingly, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with issuance of the amendment.

6. REFERENCES

1. Susquehanna FSAR Section 3.1, Conformance with NRC General Design Criteria

2. Susquehanna FSAR Section 3.13, Compliance with NRC Regulatory Guides

3. Susquehanna FSAR Section 9.4, Air Conditioning Heating Cooling and Ventilation Systems

4. NUREG-1434, "Standard Technical Specifications, General Electric BWR/6 Plants," Revision 4.0, dated April 2012

5. Issuance of Amendments to Limerick Generating Station for Secondary Containment Access Openings, Units 1 and 2, Accession number ML15356A140, dated January 28, 2016

6. Issuance of Amendments to Peach Bottom Atomic Power Station for Secondary Containment Access Openings, Units 2 and 3, Accession number ML15350A179, dated February 1, 2016

7. Susquehanna Steam Electric Station, Units 1 and 2 – Issuance of Amendments Re: Adoption of TSTF-425 (CAC Nos. MF5151 and MF5152) [Accession No. ML16005A234]

Attachment 1 to PLA-7486

Susquehanna Nuclear, LLC

SUSQUEHANNA STEAM ELECTRIC STATION PROPOSED AMENDMENT REQUEST TO ADDRESS SECONDARY CONTAINMENT ACCESS OPENINGS

Technical Specification Mark Ups

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.6.4.1.3	----------NOTE---------- Single door access openings between required zones within the secondary containment boundary may be opened for entry and exit. ---------- Verify one secondary containment access door in each access opening is closed, except when the access opening is being used for entry and exit.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.1.4	----------NOTE---------- The maximum time allowed for secondary containment draw down is dependent on the secondary containment configuration. ---------- Verify each standby gas treatment (SGT) subsystem will draw down the secondary containment to ≥ 0.25 inch of vacuum water gauge in less than or equal to the maximum time allowed for the secondary containment configuration that is OPERABLE.	----------NOTE---------- Test each configuration at least one time every 60 months. ---------- In accordance with the Surveillance Frequency Control Program
SR 3.6.4.1.5	----------NOTE---------- The maximum flow allowed for maintaining secondary containment vacuum is dependent on the secondary containment configuration. ---------- Verify each SGT subsystem can maintain ≥ 0.25 inch of vacuum water gauge in the secondary containment for at least 1 hour at a flow rate less than or equal to the maximum flow rate permitted for the secondary containment configuration that is OPERABLE.	----------NOTE---------- Test each configuration at least one time every 60 months. ---------- In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

	SURVEILLANCE	FREQUENCY
SR 3.6.4.1.3	----------NOTE---------- Single door access openings between required zones within the secondary containment boundary may be opened for entry and exit. ---------- Verify one secondary containment access door in each access opening is closed, except when the access opening is being used for entry and exit.	In accordance with the Surveillance Frequency Control Program
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SR 3.6.4.1.5	----------NOTE---------- The maximum flow allowed for maintaining secondary containment vacuum is dependent on the secondary containment configuration. ---------- Verify each SGT subsystem can maintain ≥ 0.25 inch of vacuum water gauge in the secondary containment for at least 1 hour at a flow rate less than or equal to the maximum flow rate permitted for the secondary containment configuration that is OPERABLE.	----------NOTE---------- Test each configuration at least one time every 60 months. ---------- In accordance with the Surveillance Frequency Control Program

Attachment 2 to PLA-7486

Susquehanna Nuclear, LLC

SUSQUEHANNA STEAM ELECTRIC STATION PROPOSED AMENDMENT REQUEST TO ADDRESS SECONDARY CONTAINMENT ACCESS OPENINGS

Technical Specification Bases Mark Ups (Information Only)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.6.4.1.1 (continued)

The 24 hour Frequency of this SR was developed based on operating experience related to secondary containment vacuum variations during the applicable MODES and the low probability of a DBA occurring between surveillances.

Furthermore, the 24 hour Frequency is considered adequate in view of other indications available in the control room, including alarms, to alert the operator to an abnormal secondary containment vacuum condition.

SR 3.6.4.1.2 and SR 3.6.4.1.3

Verifying that secondary containment equipment hatches, removable walls and one access door in each access opening required to be closed are closed ensures that the infiltration of outside air of such a magnitude as to prevent maintaining the desired negative pressure does not occur.

Verifying that all such openings are closed also provides adequate assurance that exfiltration from the secondary containment will not occur. In this application, the term "sealed" has no connotation of leak tightness.

An access opening typically contains one inner and one outer door. Maintaining secondary containment OPERABILITY requires verifying one door in each access opening to secondary containment zones is closed. In some cases (e.g., railroad bay), secondary containment access openings are shared such that a secondary containment barrier may have multiple inner or multiple outer doors. The intent is to maintain the secondary containment barrier intact, which is achieved by maintaining the inner or outer portion of the barrier closed at all times. However, brief, inadvertent, simultaneous opening of the inner and outer secondary containment doors for personnel entry and exit is allowed. Intentional or extended opening of both doors simultaneously, even for personnel entry and exit, is not permitted and will result in Secondary Containment being declared INOPERABLE. All secondary containment access doors are normally kept closed, except when the access opening is being used for entry and exit or when maintenance is being performed on an access opening.

When the railroad bay door (No. 101) is closed; all Zone I and III hatches, removable walls, dampers, and one door in each access opening connected to the railroad access bay are closed; or, only Zone I removable walls and/or doors are open to the railroad access shaft; or, only Zone III hatches and/or dampers are open to the railroad access shaft. When the railroad bay door (No. 101) is open; all Zone I and III hatches, removable walls, dampers, and one door in each access opening connected to the railroad access bay are closed. The truck bay hatch is closed and the truck bay door (No. 102) is closed unless Zone II is isolated from Zones I and III.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.6.4.1.2 and SR 3.6.4.1.3 (continued)

~~When an access opening between required secondary containment zones is being used for exit and entry, then at least one door (where two doors are provided) must remain closed.~~ The access openings between secondary containment zones which are not provided with two doors are administratively controlled to maintain secondary containment integrity during exit and entry. This Surveillance is modified by a Note that allows access openings with a single door (i.e., no airlock) within the secondary containment boundary (i.e., between required secondary containment zones) to be opened for entry and exit. Opening of an access door for entry and exit allows sufficient administrative control by individual personnel making the entries and exits to assure the secondary containment function is not degraded. When one of the zones is not a zone required for secondary containment OPERABILITY, the Note allowance would not apply.

~~The 31 day Frequency for these SRs has been shown to be adequate, based on operating experience, and is considered adequate in view of the other indications of door and hatch status that are available to the operator.~~ The Frequency for these SRs will be controlled in accordance with the Surveillance Frequency Control Program.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.6.4.1.1 (continued)

The 24 hour Frequency of this SR was developed based on operating experience related to secondary containment vacuum variations during the applicable MODES and the low probability of a DBA occurring between surveillances.

Furthermore, the 24 hour Frequency is considered adequate in view of other indications available in the control room, including alarms, to alert the operator to an abnormal secondary containment vacuum condition.

SR 3.6.4.1.2 and SR 3.6.4.1.3

Verifying that secondary containment equipment hatches, removable walls and one access door~~s~~ in each access opening required to be closed are closed ensures that the infiltration of outside air of such a magnitude as to prevent maintaining the desired negative pressure does not occur.

Verifying that all such openings are closed also provides adequate assurance that exfiltration from the secondary containment will not occur. In this application, the term "sealed" has no connotation of leak tightness.

An access opening typically contains one inner and one outer door. Maintaining secondary containment OPERABILITY requires verifying one door in each access opening to secondary containment zones is closed. In some cases (e.g., railroad bay), secondary containment access openings are shared such that a secondary containment barrier may have multiple inner or multiple outer doors. The intent is to maintain the secondary containment barrier intact, which is achieved by maintaining the inner or outer portion of the barrier closed at all times. However, brief, inadvertent, simultaneous opening of the inner and outer secondary containment doors for personnel entry and exit is allowed. Intentional or extended opening of both doors simultaneously, even for personnel entry and exit, is not permitted and will result in Secondary Containment being declared INOPERABLE. All secondary containment access doors are normally kept closed, except when the access opening is being used for entry and exit or when maintenance is being performed on an access opening.

When the railroad bay door (No. 101) is closed; all Zone I and III hatches, removable walls, dampers, and one door in each access opening connected to the railroad access bay are closed; or, only Zone I removable walls and/or doors are open to the railroad access shaft; or, only Zone III hatches and/or dampers are open to the railroad access shaft. When the railroad bay door (No. 101) is open; all Zone I and III hatches, removable walls, dampers, and one door in each access opening connected to the railroad access bay are closed. The truck bay hatch is closed and the truck bay door (No. 102) is closed unless Zone II is isolated from Zones I and III.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.6.4.1.2 and SR 3.6.4.1.3 (continued)

~~When an access opening between required secondary containment zones is being used for exit and entry, then at least one door (where two doors are provided) must remain closed.~~ The access openings between secondary containment zones which are not provided with two doors are administratively controlled to maintain secondary containment integrity during exit and entry. This Surveillance is modified by a Note that allows access openings with a single door (i.e., no airlock) within the secondary containment boundary (i.e., between required secondary containment zones) to be opened for entry and exit. Opening of an access door for entry and exit allows sufficient administrative control by individual personnel making the entries and exits to assure the secondary containment function is not degraded. When one of the zones is not a zone required for secondary containment OPERABILITY, the Note allowance would not apply.

~~The 31 day Frequency for these SRs has been shown to be adequate, based on operating experience, and is considered adequate in view of the other indications of door and hatch status that are available to the operator.~~ The Frequency for these SRs will be controlled in accordance with the Surveillance Frequency Control Program.

(continued)

Attachment 3 to PLA-7486

Susquehanna Nuclear, LLC

SUSQUEHANNA STEAM ELECTRIC STATION PROPOSED AMENDMENT REQUEST TO ADDRESS SECONDARY CONTAINMENT ACCESS OPENINGS

Revised Technical Specifications

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.6.4.1.3	Verify one secondary containment access door in each access opening is closed, except when the access opening is being used for entry and exit.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.1.4	----------NOTE---------- The maximum time allowed for secondary containment draw down is dependent on the secondary containment configuration. ---------- Verify each standby gas treatment (SGT) subsystem will draw down the secondary containment to ≥ 0.25 inch of vacuum water gauge in less than or equal to the maximum time allowed for the secondary containment configuration that is OPERABLE.	----------NOTE---------- Test each configuration at least one time every 60 months. ---------- In accordance with the Surveillance Frequency Control Program
SR 3.6.4.1.5	----------NOTE---------- The maximum flow allowed for maintaining secondary containment vacuum is dependent on the secondary containment configuration. ---------- Verify each SGT subsystem can maintain ≥ 0.25 inch of vacuum water gauge in the secondary containment for at least 1 hour at a flow rate less than or equal to the maximum flow rate permitted for the secondary containment configuration that is OPERABLE.	----------NOTE---------- Test each configuration at least one time every 60 months. ---------- In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
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