

For Discussion Purposes Only  
Potential Change to EGM 11-003

Existing language:

The licensee shall meet the following requirements, which specify the minimum makeup flow rate and water inventory:

- a) During OPDRV activities the water level shall be equal to or greater than [23]<sup>1</sup> feet (RHR – High Water Level) over the top of the RPV flange and the gate to the spent fuel storage pool and to the upper containment cavity to dryer pool (as applicable) shall be removed.
- b) During OPDRV activities, at least one safety-related pump shall be available (preferably aligned to the division with the required operable EDG), and it shall be aligned to a makeup water source with the capability to inject water equal to, or greater than, the maximum potential leakage rate from the RPV for a minimum time period of four hours. If at any time the water inventory requirement is not met or inventory makeup capability is lost, then actions shall be initiated to immediately suspend OPDRV activities.
- c) During OPDRV activities, the time to drain down the water inventory from the RHR - High Water Level to the top of the RPV flange shall be greater than 24 hours based on the calculated maximum leak rate for OPDRV activities.

Potential Inserted Language:

Drain paths protected by safety-related, redundant, automatic isolation valves actuated by operable instrumentation are considered OPDRV activities. The requirements delineated above do not apply to this category of OPDRV activity. However, if additional OPDRV activities are in progress, the time to drain via this pathway must be included in the calculated maximum leak rate for OPDRV activities per item c. above.

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<sup>1</sup> Use the plant-specific TS allowable value for RHR – High Water Level (23 feet is a typical value).