FPL

MAR 3 0 2017

L-2017-041
10 CFR 50.90

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Re: Florida Power & Light Company
St. Lucie Units 1 and 2, Docket Nos. 50-335, 50-389

NextEra Energy Seabrook, LLC
Seabrook Station, Docket No. 50-443

Subject: Application to Revise Technical Specifications to Adopt TSTF-522, "Revise Ventilation System Surveillance Requirements to Operate for 10 Hours Per Month," Using the Consolidated Line Item Improvement Process

Florida Power & Light Company (FPL), acting on behalf of itself and as agent for NextEra Energy Seabrook, LLC (NextEra) is submitting a request for an amendment to the technical specifications (TS) for St. Lucie Units 1 and 2 and Seabrook Station. The proposed amendment would modify TS requirements to operate ventilation systems with charcoal filters for 10 hours each month in accordance with TSTF-522, Revision 0, "Revise Ventilation System Surveillance Requirements to Operate for 10 hours per Month."

Attachment 1 provides a description and assessment of the proposed changes, the requested confirmation of applicability, and plant-specific verifications. Attachment 2 provides the existing TS pages marked up to show the proposed changes. Attachment 3 provides revised (clean) TS pages. Attachment 4 provides existing TS Bases pages marked up to show the proposed changes. The changes to the TS Bases are provided for information only and will be incorporated in accordance with the plant's TS Bases Control Program upon implementation of the approved amendment.

This letter contains no new or revised regulatory commitments.

FPL requests approval of the proposed amendments by March 31, 2018. Once approved, the amendments shall be implemented within 90 days.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated officials in Florida and New Hampshire.

A001
NRR

If you should have any questions regarding this submittal, please contact Steve Catron, Fleet Licensing Manager, at 561-304-6206.

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

Executed on 3/30, 2017

Sincerely,

Larry Nicholson
Director, Nuclear Licensing and Regulatory Compliance
Florida Power & Light Company

Attachments: 1. Description and Assessment
2. Proposed Technical Specification Changes (Mark-Up)
3. Revised Technical Specification Pages
4. Proposed Technical Specification Bases Changes (Mark-Up)

cc: NRC Project Manager - St. Lucie
NRC Project Manager - Seabrook
Regional Administrator - NRC Region 1
Regional Administrator - NRC Region 2
NRC Resident Inspector - St. Lucie
NRC Resident Inspector - Seabrook
Ms. Cindy Becker, Florida Department of Health
Director Homeland Security and Emergency Management (New Hampshire)
Mr. John Giarrusso, Jr., Nuclear Preparedness Manager (Massachusetts)

ATTACHMENT 1 - DESCRIPTION AND ASSESSMENT

1.0 DESCRIPTION

The proposed change revises the Surveillance Requirements (SR) that currently require operating ventilation systems with the heaters operating for at least 10 hours at a frequency controlled in accordance with the Surveillance Frequency Control Program (SFCP). The SR are revised to require operation of the systems for 15 continuous minutes at a frequency controlled in accordance with the SFCP. The proposed amendment is consistent with TSTF-522, Revision 0, "Revise Ventilation System Surveillance Requirements to Operate for 10 hours per Month."

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

FPL and NextEra have reviewed the model safety evaluation published September 20, 2012, as part of the Federal Register Notice of Availability. This review included a review of the NRC staff's evaluation, as well as the information provided in TSTF-522. As described in the subsequent paragraphs, FPL and NextEra have concluded that the justifications presented in the TSTF-522 proposal and the model safety evaluation prepared by the NRC staff are applicable to Seabrook and St. Lucie Units 1 and 2 and justify this amendment for the incorporation of the changes to the Seabrook and St. Lucie Units 1 and 2 TS.

The model safety evaluation discusses the applicable regulatory requirements including the applicable 10 CFR 50, Appendix A, General Design Criteria (GDC). However, the construction of St. Lucie Unit 1 preceded publication of the (AEC) "General Design Criteria for Nuclear Power Plants" (10 CFR 50, Appendix A, February 20, 1971). The Updated Final Safety Analysis Report, section 3.1, Conformance with General Design Criteria, discusses the design intent for St. Lucie Unit 1 in consideration of the GDC. With regard to the proposed change, the plant-specific requirements are sufficiently similar to the Appendix A GDC; therefore, the proposed change is applicable to St. Lucie Unit 1.

2.2 Optional Changes and Variations

FPL and NextEra are proposing the following variations from the TS changes described in TSTF-522, Revision 0, or the applicable parts of the NRC staff's model safety evaluation dated September 20, 2012.

The Seabrook and St. Lucie Units 1 and 2 TS utilize different numbering and titles than the Standard Technical Specifications on which TSTF-522 was based. The table below shows the differences between the plant-specific TS numbering and titles and the corresponding TSTF-522 numbering and titles. These differences are administrative and do not affect the applicability of TSTF-522 to the Seabrook and St. Lucie Units 1 and 2 TS.

Plant Specific TS		TSTF-522 TS	
Seabrook			
TS 3.7.6	Control Room Emergency Makeup Air and Filtration System (CREMAFS)	TS 3.7.10	Control Room Emergency Filtration System (CREFS)
TS 3.9.12	Fuel Storage Building Emergency Air Cleaning System	TS 3.7.13	Fuel Building Air Cleanup System (FBACS)
St. Lucie Units 1 & 2			
TS 3.6.6.1	Shield Building Ventilation System (SBVS)	TS 3.6.8	Shield Building Exhaust Air Cleanup System (SBEACS)

The Seabrook and St. Lucie TS, which are based on NUREG-0452 and NUREG-0212, respectively, do not contain Bases as comprehensive as those in the Improved Standard TS for Westinghouse Plants (NUREG-1431) and for Combustion Engineering plants (NUREG-1432). Therefore, many of the Bases mark-ups in TSTF-522 are not applicable to the Seabrook and St. Lucie TS Bases. This variation from TSTF-522 is administrative in nature and does not affect the applicability of TSTF-522 to the Seabrook and St. Lucie Units 1 and 2 TS.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Determination

Seabrook requests adoption of an approved change to the standard technical specifications (STS) and plant specific technical specifications (TS) to revise TS 3.7.6, Control Room Emergency Makeup Air and Filtration System (CREMAFS); and TS 3.9.12, Fuel Storage Building Emergency Air Cleaning System (FSBEACS), to revise the Surveillance Requirement (SR) to operate CREMAFS and FSBEACS with the electric heaters operating for a continuous 10 hour period at a frequency controlled in accordance with the Surveillance Frequency Control Program (SFCP). The SR is revised to require operation of the systems for 15 continuous minutes in accordance with the SFCP.

St. Lucie Units 1 and 2 request adoption of an approved change to the STS and plant specific TS to revise TS 3.6.6.1, Shield Building Ventilation System (SBVS) to revise the SR to operate the SBVS with the electric heaters operating for at least a 10 hour period at a frequency controlled in accordance with the SFCP. The SR is revised to require operation of the system for 15 continuous minutes in accordance with the SFCP.

As required by 10 CFR 50.91(a), an analysis of the issue of no significant hazards consideration is presented 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 replaces an existing Surveillance Requirement to operate the CREMAFS, FSBEACS, and SBVS equipped with electric heaters for at least a continuous 10 hour period in accordance with the SFCP with a requirement to operate the systems for 15 continuous minutes with heaters operating.

These systems are not accident initiators and therefore, these changes do not involve a significant increase in the probability of an accident. The proposed system and filter testing changes are consistent with current regulatory guidance for these systems and will continue to assure that these systems perform their design function which may include mitigating accidents. Thus, the change does not involve a significant increase in the consequences of an accident.

Therefore, it is concluded that this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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 replaces an existing Surveillance Requirement to operate the CREMAFS, FSBEACS, and SBVS equipped with electric heaters for at least a continuous 10 hour period in accordance with the SFCP with a requirement to operate the systems for 15 continuous minutes with heaters operating.

The change proposed for these ventilation systems does not change any system operations or maintenance activities. Testing requirements will be revised and will continue to demonstrate that the Limiting Conditions for Operation are met and the system components are capable of performing their intended safety functions. The change does not create new failure modes or mechanisms and no new accident precursors are generated.

Therefore, it is concluded that this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Response: No.

The proposed change replaces an existing Surveillance Requirement to operate the CREMAFS, FSBEACS, and SBVS equipped with electric heaters for at least a continuous 10 hour period in accordance with the SFCP with a requirement to operate the systems for 15 continuous minutes with heaters operating.

The design basis for the ventilation systems' heaters is to heat the incoming air which reduces the relative humidity. The heater testing change proposed will continue to demonstrate that the heaters are capable of heating the air and will perform their design function. The proposed change is consistent with regulatory guidance.

Therefore, it is concluded that this change does not involve a significant reduction in a margin of safety. Based on the above, FPL and NextEra conclude 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.

4.0 ENVIRONMENTAL EVALUATION

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 effluent 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.

ATTACHMENT 2

Proposed Technical Specification Changes (Mark-Up)

Seabrook Proposed Technical Specification Changes (Mark-Up)

PLANT SYSTEMS

3/4.7.6 CONTROL ROOM SUBSYSTEM

EMERGENCY MAKEUP AIR AND FILTRATION

LIMITING CONDITION FOR OPERATION (Continued)

In MODE 5 or 6, or during movement of irradiated fuel assemblies:

d. With one CREMAFS train inoperable for reasons other than an inoperable CRE boundary, restore the inoperable system to OPERABLE status within 7 days or either immediately initiate and maintain operation of the remaining OPERABLE CREMAFS train in the filtration/recirculation mode or immediately suspend movement of irradiated fuel assemblies.

e. With both CREMAFS trains inoperable, or with the OPERABLE CREMAFS train, required to be in the filtration/recirculation mode by ACTION d., not capable of being powered by an OPERABLE emergency power source, immediately suspend all movement of irradiated fuel assemblies.

f. With one or both CREMAFS trains inoperable due to an inoperable CRE boundary, immediately suspend movement of irradiated fuel assemblies.

SURVEILLANCE REQUIREMENTS

4.7.6.1 Each CREMAFS train shall be demonstrated OPERABLE:

a. In accordance with the Surveillance Frequency Control Program by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the system operates for at least ~~10~~ continuous ~~hours~~ with the heaters operating;

15 minutes

REFUELING OPERATIONS

3/4.9.12 FUEL STORAGE BUILDING EMERGENCY AIR CLEANING SYSTEM

LIMITING CONDITION FOR OPERATION

3.9.12 Two independent trains of the Fuel Storage Building Emergency Air Cleaning System shall be OPERABLE whenever irradiated fuel is in the storage pool and shall be OPERABLE with one train operating during fuel movement.

APPLICABILITY: Whenever irradiated fuel is in the storage pool.

ACTION:

a. With one train of the Fuel Storage Building Emergency Air Cleaning System inoperable, fuel movement within the storage pool or crane operation with loads over the storage pool may proceed provided the OPERABLE train of the Fuel Storage Building Emergency Air System is capable of being powered from an OPERABLE emergency power source and is in operation and discharging through at least one train of HEPA filters and charcoal adsorbers.

b. With no trains of the Fuel Storage Building Emergency Air Cleaning System OPERABLE, suspend all operations involving movement of fuel within the storage pool or crane operation with loads over the storage pool until at least one train of the Fuel Storage Building Emergency Air Cleaning System is restored to OPERABLE status and is in operation.

c. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.9.12 The above required trains of the Fuel Storage Building Emergency Air Cleaning System shall be demonstrated OPERABLE:

a. In accordance with the Surveillance Frequency Control Program by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the system operates for at least ~~10~~ 15 continuous ~~hours~~ minutes with the heaters operating;

b. In accordance with the Surveillance Frequency Control Program or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire, or chemical release in any ventilation zone communicating with the system by:

St. Lucie Unit 1 Proposed Technical Specification Changes (Mark-Up)

CONTAINMENT SYSTEMS

3/4.6.6 SECONDARY CONTAINMENT

SHIELD BUILDING VENTILATION SYSTEM

LIMITING CONDITION FOR OPERATION

3.6.6.1 Two independent shield building ventilation systems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

a. With one shield building ventilation system inoperable, restore the inoperable system to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

NOTE
Action not applicable when second shield building ventilation system intentionally made inoperable.

b. With two shield building ventilation systems inoperable, within 1 hour verify at least one train of containment spray is OPERABLE, and restore at least one shield building ventilation system to OPERABLE status within 24 hours; otherwise, be in at least HOT STANDBY within the next 6 hours and COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

15 continuous minutes

4.6.6.1 Each shield building ventilation system shall be demonstrated OPERABLE:

a. In accordance with the Surveillance Frequency Control Program by initiating, from the control room, flow through the HEPA filter and charcoal adsorber train and verifying that the train operates for at least ~~10 hours~~ with the heaters on.

b. By performing required shield building ventilation system filter testing in accordance with the Ventilation Filter Testing Program.

c. In accordance with the Surveillance Frequency Control Program by:

1. Verifying that the air flow distribution is uniform within 20% across HEPA filters and charcoal adsorbers when tested in accordance with ASME N510-1989.

2. Verifying that the filtration system starts automatically on a Containment Isolation Signal (CIS).

3. Verifying that the filter cooling makeup air and cross connection valves can be manually opened.

4. Verifying that each system produces a negative pressure of $\geq$ 2.0 inches W.G. in the annulus within 2 minutes after a Containment Isolation Signal (CIS).

St. Lucie Unit 2 Proposed Technical Specification Changes (Mark-Up)

CONTAINMENT SYSTEMS

3/4.6.6 SECONDARY CONTAINMENT

SHIELD BUILDING VENTILATION SYSTEM (SBVS)

LIMITING CONDITION FOR OPERATION

3.6.6.1 Two independent Shield Building Ventilation Systems shall be OPERABLE.

APPLICABILITY: At all times in MODES 1, 2, 3, and 4.
In addition, during movement of recently irradiated fuel assemblies or during crane operations with loads over recently irradiated fuel assemblies in the Spent Fuel Storage Pool in MODES 5 and 6.

ACTION:

a. With the SBVS inoperable solely due to loss of the SBVS capability to provide design basis filtered air evacuation from the Spent Fuel Pool area, only ACTION-c is required. If the SBVS is inoperable for any other reason, concurrently implement ACTION-b and ACTION-c.

b. (1) With one SBVS inoperable in MODE 1, 2, 3, or 4, restore the inoperable system to OPERABLE status within 7 days; otherwise, be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

NOTE
Action not applicable when second SBVS intentionally made inoperable.

(2) With both SBVSs inoperable, within 1 hour verify at least one train of containment spray is OPERABLE, and restore at least one SBVS to OPERABLE status within 24 hours; otherwise, be in at least HOT STANDBY within the next 6 hours and COLD SHUTDOWN within the following 30 hours.

c. (1) With one SBVS inoperable in any MODE, restore the inoperable system to OPERABLE status within 7 days; otherwise, suspend movement of recently irradiated fuel assemblies within the Spent Fuel Storage Pool and crane operations with loads over recently irradiated fuel in the Spent Fuel Storage Pool.

(2) With both SBVS inoperable in any MODE, immediately suspend movement of recently irradiated fuel assemblies within the Spent Fuel Storage Pool and crane operations with loads over recently irradiated fuel in the Spent Fuel Storage Pool.

SURVEILLANCE REQUIREMENTS

15 continuous minutes

4.6.6.1 Each Shield Building Ventilation System shall be demonstrated OPERABLE:

a. In accordance with the Surveillance Frequency Control Program by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the system operates for at least ~~10 hours~~ with the heaters on.

b. In accordance with the Surveillance Frequency Control Program or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire, or chemical release in any ventilation zone communicating with the system by:

1. Performing a visual examination of SBVS in accordance with ASME N510-1989.

ATTACHMENT 3

Revised Technical Specification Pages

Seabrook Revised Technical Specification Pages

PLANT SYSTEMS

3/4.7.6 CONTROL ROOM SUBSYSTEM

EMERGENCY MAKEUP AIR AND FILTRATION

LIMITING CONDITION FOR OPERATION (Continued)

In MODE 5 or 6, or during movement of irradiated fuel assemblies:

d. With one CREMAFS train inoperable for reasons other than an inoperable CRE boundary, restore the inoperable system to OPERABLE status within 7 days or either immediately initiate and maintain operation of the remaining OPERABLE CREMAFS train in the filtration/recirculation mode or immediately suspend movement of irradiated fuel assemblies.

e. With both CREMAFS trains inoperable, or with the OPERABLE CREMAFS train, required to be in the filtration/recirculation mode by ACTION d., not capable of being powered by an OPERABLE emergency power source, immediately suspend all movement of irradiated fuel assemblies.

f. With one or both CREMAFS trains inoperable due to an inoperable CRE boundary, immediately suspend movement of irradiated fuel assemblies.

SURVEILLANCE REQUIREMENTS

4.7.6.1 Each CREMAFS train shall be demonstrated OPERABLE:

a. In accordance with the Surveillance Frequency Control Program by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the system operates for at least 15 continuous minutes with the heaters operating;

REFUELING OPERATIONS

3/4.9.12 FUEL STORAGE BUILDING EMERGENCY AIR CLEANING SYSTEM

LIMITING CONDITION FOR OPERATION

3.9.12 Two independent trains of the Fuel Storage Building Emergency Air Cleaning System shall be OPERABLE whenever irradiated fuel is in the storage pool and shall be OPERABLE with one train operating during fuel movement.

APPLICABILITY: Whenever irradiated fuel is in the storage pool.

ACTION:

a. With one train of the Fuel Storage Building Emergency Air Cleaning System inoperable, fuel movement within the storage pool or crane operation with loads over the storage pool may proceed provided the OPERABLE train of the Fuel Storage Building Emergency Air System is capable of being powered from an OPERABLE emergency power source and is in operation and discharging through at least one train of HEPA filters and charcoal adsorbers.

b. With no trains of the Fuel Storage Building Emergency Air Cleaning System OPERABLE, suspend all operations involving movement of fuel within the storage pool or crane operation with loads over the storage pool until at least one train of the Fuel Storage Building Emergency Air Cleaning System is restored to OPERABLE status and is in operation.

c. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.9.12 The above required trains of the Fuel Storage Building Emergency Air Cleaning System shall be demonstrated OPERABLE:

a. In accordance with the Surveillance Frequency Control Program by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the system operates for at least 15 continuous minutes with the heaters operating;

b. In accordance with the Surveillance Frequency Control Program or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire, or chemical release in any ventilation zone communicating with the system by:

St. Lucie Unit 1 Revised Technical Specification Pages

CONTAINMENT SYSTEMS

3/4.6.6 SECONDARY CONTAINMENT

SHIELD BUILDING VENTILATION SYSTEM

LIMITING CONDITION FOR OPERATION

3.6.6.1 Two independent shield building ventilation systems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

a. With one shield building ventilation system inoperable, restore the inoperable system to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

NOTE
Action not applicable when second shield building ventilation system intentionally made inoperable.

b. With two shield building ventilation systems inoperable, within 1 hour verify at least one train of containment spray is OPERABLE, and restore at least one shield building ventilation system to OPERABLE status within 24 hours; otherwise, be in at least HOT STANDBY within the next 6 hours and COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.6.1 Each shield building ventilation system shall be demonstrated OPERABLE:

a. In accordance with the Surveillance Frequency Control Program by initiating, from the control room, flow through the HEPA filter and charcoal adsorber train and verifying that the train operates for at least 15 continuous minutes with the heaters on.

b. By performing required shield building ventilation system filter testing in accordance with the Ventilation Filter Testing Program.

c. In accordance with the Surveillance Frequency Control Program by:

1. Verifying that the air flow distribution is uniform within 20% across HEPA filters and charcoal adsorbers when tested in accordance with ASME N510-1989.

2. Verifying that the filtration system starts automatically on a Containment Isolation Signal (CIS).

3. Verifying that the filter cooling makeup air and cross connection valves can be manually opened.

4. Verifying that each system produces a negative pressure of $\geq$ 2.0 inches W.G. in the annulus within 2 minutes after a Containment Isolation Signal (CIS).

St. Lucie Unit 2 Revised Technical Specification Pages

CONTAINMENT SYSTEMS

3/4.6.6 SECONDARY CONTAINMENT

SHIELD BUILDING VENTILATION SYSTEM (SBVS)

LIMITING CONDITION FOR OPERATION

3.6.6.1 Two independent Shield Building Ventilation Systems shall be OPERABLE.

APPLICABILITY: At all times in MODES 1, 2, 3, and 4.
In addition, during movement of recently irradiated fuel assemblies or during crane operations with loads over recently irradiated fuel assemblies in the Spent Fuel Storage Pool in MODES 5 and 6.

ACTION:

a. With the SBVS inoperable solely due to loss of the SBVS capability to provide design basis filtered air evacuation from the Spent Fuel Pool area, only ACTION-c is required. If the SBVS is inoperable for any other reason, concurrently implement ACTION-b and ACTION-c.

b. (1) With one SBVS inoperable in MODE 1, 2, 3, or 4, restore the inoperable system to OPERABLE status within 7 days; otherwise, be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

NOTE
Action not applicable when second SBVS intentionally made inoperable.

(2) With both SBVSs inoperable, within 1 hour verify at least one train of containment spray is OPERABLE, and restore at least one SBVS to OPERABLE status within 24 hours; otherwise, be in at least HOT STANDBY within the next 6 hours and COLD SHUTDOWN within the following 30 hours.

c. (1) With one SBVS inoperable in any MODE, restore the inoperable system to OPERABLE status within 7 days; otherwise, suspend movement of recently irradiated fuel assemblies within the Spent Fuel Storage Pool and crane operations with loads over recently irradiated fuel in the Spent Fuel Storage Pool.

(2) With both SBVS inoperable in any MODE, immediately suspend movement of recently irradiated fuel assemblies within the Spent Fuel Storage Pool and crane operations with loads over recently irradiated fuel in the Spent Fuel Storage Pool.

SURVEILLANCE REQUIREMENTS

4.6.6.1 Each Shield Building Ventilation System shall be demonstrated OPERABLE:

a. In accordance with the Surveillance Frequency Control Program by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the system operates for at least 15 continuous minutes with the heaters on.

b. In accordance with the Surveillance Frequency Control Program or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire, or chemical release in any ventilation zone communicating with the system by:

1. Performing a visual examination of SBVS in accordance with ASME N510-1989.

ATTACHMENT 4

Seabrook Proposed Technical Specification Bases Changes (Mark-Up)

3/4.7.6 CONTROL ROOM SUBSYSTEMS (Continued)

SURVEILLANCE REQUIREMENTS

SR 4.7.6.1

Standby systems should be checked periodically to ensure that they function properly. As the environment and normal operating conditions on this system are not too severe, testing each train in accordance with the Surveillance Frequency Control Program provides an adequate check of this system. Periodic heater operations dry out any moisture accumulated in the charcoal from humidity in the ambient air. Systems with heaters must be operated for ~~≥10~~ 15 continuous ~~hours~~ minutes with the heaters energized. The surveillance frequency is controlled under the Surveillance Frequency Control Program.

SRs also periodically test the performance of the HEPA filter, charcoal adsorber efficiency, minimum flow rate, and the physical properties of the activated charcoal.

The SRs verify that each CREMAFS train starts and operates on test actuation signals. The surveillance frequency is controlled under the Surveillance Frequency Control Program.

SR 4.7.6.2

This SR verifies the OPERABILITY of the CRE boundary by testing for unfiltered air inleakage past the CRE boundary and into the CRE. The details of the testing are specified in the Control Room Envelope Habitability Program.

The CRE is considered habitable when the radiological dose to CRE occupants calculated in the licensing basis analyses of DBA consequences is no more than 5 rem TEDE and the CRE occupants are protected from smoke. This SR verifies that the unfiltered air inleakage into the CRE is no greater than the flow rate assumed in the licensing basis analyses of DBA consequences. When unfiltered air inleakage is greater than the assumed flow rate, Action b. must be entered. Action b.3 allows time to restore the CRE boundary to OPERABLE status provided mitigating actions can ensure that the CRE remains within the licensing basis habitability limits for the occupants following an accident. Compensatory measures are discussed in Regulatory Guide 1.196, Section C.2.7.3 (Ref. 5), which endorses, with exceptions, NEI 99-03, Section 8.4 and Appendix F (Ref. 6). These compensatory measures may also be used as mitigating actions as required by Action b.2. Options for restoring the CRE boundary to OPERABLE status include changing the licensing basis DBA consequence analysis, repairing the CRE boundary, or a combination of these actions. Depending upon the nature of the problem and the corrective action, a full scope inleakage test may not be necessary to establish that the CRE boundary has been restored to OPERABLE status.

3/4.9 REFUELING OPERATIONS (Continued)

BASES

3/4.9.9 (THIS SPECIFICATION NUMBER IS NOT USED.)

3/4.9.10 and 3/4.9.11 WATER LEVEL - REACTOR VESSEL and STORAGE POOL

The restrictions on minimum water level ensure that sufficient water depth is available to remove 99% of the assumed 10% iodine gap activity released from the rupture of an irradiated fuel assembly. The minimum water depth is consistent with the assumptions of the safety analysis. Suspending fuel movement or crane operation does not preclude moving a component to a safe location.

3/4.9.12 FUEL STORAGE BUILDING EMERGENCY AIR CLEANING SYSTEM

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The limitations on the Fuel Storage Building Emergency Air Cleaning System ensure that all radioactive material released from an irradiated fuel assembly will be filtered through the HEPA filters and charcoal adsorber prior to discharge to the atmosphere. minutes Operation of the system with the heaters operating for at least ~~10~~ continuous ~~hours~~ in a 31-day period is sufficient to reduce the buildup of moisture on the adsorbers and HEPA filters. The OPERABILITY of this system and the resulting iodine removal capacity are consistent with the assumptions of the safety analyses. ANSI N510-1980 will be used as a procedural guide for surveillance testing. Suspending fuel movement or crane operation does not preclude moving a component to a safe location.

One train of the Fuel Storage Building Emergency Air Cleaning System must be in operation during fuel movement. This requirement, however, does not apply to movement of a spent fuel cask containing irradiated fuel in preparation for transfer to dry storage. Movement of fuel after it has been inserted into a spent fuel cask and unlatched from the lifting tool is no longer a consideration with regard to this specification.

3/4.9.13 SPENT FUEL ASSEMBLY STORAGE

Restrictions on placement of fuel assemblies of certain enrichments within the Spent Fuel Pool is dictated by Specification 5.6.1.3. These restrictions ensure that the k_{eff} of the Spent Fuel Pool will always remain less than 1.0 assuming the pool to be flooded with unborated water and less than or equal to 0.95 when flooded with water borated to 500 ppm. The restrictions delineated in Specification 5.6.1.3 and the action statement are consistent with the criticality safety analysis performed for the Spent Fuel Pool as documented in the UFSAR.