Attachment A

1. Replace Technical Specification page 3.6-6.

| PENT. NO. | IDENTIFICATION/DESCRIPTION | ISOLATION BOUNDARY | MAXIMUM ISOLATION TIME *(SEC) | ISOLATION BOUNDARY | MAXIMUM ISOLATION TIME *(SEC) |
|---|---|---|---|---|---|
| 203 | Contain. Press. transmitter PT-947 & 948 | PT 947<br>PT 948 | NA<br>NA | MV 1819C<br>MV 1819D | NA<br>NA |
| 203 | Post accident air sample to "B" fan | MV 1563<br>MV 1566 | NA<br>NA | MV 1565<br>MV 1568 | NA<br>NA |
| 204 | Purge Supply Duct | AOV 5870 | 5 | AOV 5869 | 5 |
| 205 | Hot leg loop sample | AOV 966C | 60 | MV 956D(14) | NA |
| 206 | Przr. liquid space sample | AOV 966B | 60 | MV 956E(14) | NA |
| 206 | "A" S/G sample | AOV 5735 | 60 | MV 5733(7) | NA |
| 207 | Przr. Steam space sample | AOV 966A | 60 | MV 956F | NA |
| 207 | "B" S/G sample | AOV 5736 | 60 | MV 5734(7) | NA |
| 209 | Reactor Compart. cooling Units A & B | MV 4758(16)<br>MV 4635(16) | NA<br>NA | (11)<br>(11) | NA<br>NA |
| 210 | Oxygen makeup to A & B recombiners | MV 1080A | NA | SOV IV-2A<br>SOV IV-2B | NA Normally Closed<br>NA Normally Closed |
| 300 | Purge Exhaust Duct | AOV 5878 | 5 | AOV 5879 | 5 |
| 301 | Aux. steam supply to containment | MV 6151 | NA | MV 6165(15) | NA |
| 303 | Aux. steam condensate return | MV 6175 | NA | MV 6152(15) | NA |
| 304 | "A" Hydrogen recombiner (pilot and main) | MV 1084A<br>MV 1076A | NA<br>NA | SOV IV-5A<br>SOV IV-3A | NA Normally Closed<br>NA Normally Closed |
| 305 | Radiation Monitors R-11, R-12 & R-10A Auto Inlet Isol. | AOV 1597 | 60 | MV 1596 | NA |
| 305 | R-11, R-12 & R-10A Outlet | AOV 1599 | 60 | AOV 1598 | 60 |
| 305 | Post Accident air sample (containment) | MV 1554<br>MV 1557<br>MV 1560 | NA<br>NA<br>NA | MV 1556<br>MV 1559<br>MV 1562 | NA<br>NA<br>NA |
| 307 | Fire Service Water | CV 9229 | NA | AOV 9227 | (18) |

Attachment B
Safety Evaluation

The proposed Technical Specification change affects the containment isolation boundary for a single containment penetration, penetration 305, the containment radiation monitor return line. A chronic problem with the existing containment isolation check valve has necessitated a modification to this line. The existing check valve will be replaced by a new air-operated valve outside containment but close to the containment wall. The modification will improve the containment isolation valve reliability.

As a result of the modification, both automatic valves for isolation of this line will be outside containment. This type of arrangement has previously been evaluated to be acceptable in the Ginna SEP Integrated Plant Safety Assessment, NUREG-0821. The piping design pressure between the containment and the isolation valves is at least equal to the containment design pressure. The isolation valves are designed to function against containment pressure. The modified piping run between the containment and the new valve is as short as possible, approximately 3 feet, and is Seismic Category I. The piping supports for the new valve and piping between it and the containment wall are designed to subsection NF of the ASME code.

The NRC PRA study reported in NUREG-0821 found that the risk resulting from two valves outside containment is about the same as the risk resulting from one valve inside and one valve outside containment.

The modified piping configuration outside containment will not be susceptible to an event which could also cause a LOCA or event inside containment that would require containment isolation. Conversely, an event inside containment will not result in damage to the isolation piping outside containment.

The new valve to be installed will close on the same isolation signals as other valves in this radiation monitor system. Resetting of the containment isolation signal will not cause the valve to automatically reopen. The new valve will operate and reopen in conjunction with existing valve 1597, another valve in the same system and in a line within the same penetration, which allows passage of air from the containment to the radiation monitor. Electrical independence and single failure protection will be maintained. Ganged reopening of two valves within the same system and performing a single function meets the intent of NUREG-0737.

Based upon these reasons, the proposed modification is acceptable under General Design Criterion 56 on an "other defined basis" as permitted by the GDC.

Therefore, the piping modification and the Technical Specification change will not result in any undue risk to public and safety.