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TSB2 - TECHNICAL SPECIFICATIONS BASES UNIT 2 MANUAL

REMOVE MANUAL TABLE OF CONTENTS DATE: 04/19/2018

ADD MANUAL TABLE OF CONTENTS DATE: 04/24/2018

CATEGORY: DOCUMENTS TYPE: TSB2

ID: TEXT 3.6.4.2

ADD: REV: 13

REMOVE: REV:12

*ADD
NRR*

CATEGORY: DOCUMENTS TYPE: TSB2
ID: TEXT LOES
REMOVE: REV:135

ADD: REV: 136

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SSES MANUAL

Manual Name: TSB2

Manual Title: TECHNICAL SPECIFICATIONS BASES UNIT 2 MANUAL

Table Of Contents

Issue Date: 04/24/2018

<u>Procedure Name</u>	<u>Rev</u>	<u>Issue Date</u>	<u>Change ID</u>	<u>Change Number</u>
TEXT LOES	136	04/24/2018		
Title: LIST OF EFFECTIVE SECTIONS				
TEXT TOC	23	03/01/2017		
Title: TABLE OF CONTENTS				
TEXT 2.1.1	5	01/22/2015		
Title: SAFETY LIMITS (SLS) REACTOR CORE SLS				
TEXT 2.1.2	1	10/04/2007		
Title: SAFETY LIMITS (SLS) REACTOR COOLANT SYSTEM (RCS) PRESSURE SL				
TEXT 3.0	3	08/20/2009		
Title: LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY				
TEXT 3.1.1	1	03/24/2005		
Title: REACTIVITY CONTROL SYSTEMS SHUTDOWN MARGIN (SDM)				
TEXT 3.1.2	0	11/18/2002		
Title: REACTIVITY CONTROL SYSTEMS REACTIVITY ANOMALIES				
TEXT 3.1.3	3	11/16/2016		
Title: REACTIVITY CONTROL SYSTEMS CONTROL ROD OPERABILITY				
TEXT 3.1.4	5	11/16/2016		
Title: REACTIVITY CONTROL SYSTEMS CONTROL ROD SCRAM TIMES				
TEXT 3.1.5	2	11/16/2016		
Title: REACTIVITY CONTROL SYSTEMS CONTROL ROD SCRAM ACCUMULATORS				
TEXT 3.1.6	4	11/16/2016		
Title: REACTIVITY CONTROL SYSTEMS ROD PATTERN CONTROL				

SSES MANUAL

Manual Name: TSB2

Manual Title: TECHNICAL SPECIFICATIONS BASES UNIT 2 MANUAL

TEXT 3.1.7 4 11/16/2016
Title: REACTIVITY CONTROL SYSTEMS STANDBY LIQUID CONTROL (SLC) SYSTEM

TEXT 3.1.8 4 11/16/2016
Title: REACTIVITY CONTROL SYSTEMS SCRAM DISCHARGE VOLUME (SDV) VENT AND DRAIN VALVES

TEXT 3.2.1 5 11/16/2016
Title: POWER DISTRIBUTION LIMITS AVERAGE PLANAR LINEAR HEAT GENERATION RATE (APLHGR)

TEXT 3.2.2 4 11/16/2016
Title: POWER DISTRIBUTION LIMITS MINIMUM CRITICAL POWER RATIO (MCPR)

TEXT 3.2.3 3 11/16/2016
Title: POWER DISTRIBUTION LIMITS LINEAR HEAT GENERATION RATE LHGR

TEXT 3.3.1.1 6 11/16/2016
Title: INSTRUMENTATION REACTOR PROTECTION SYSTEM (RPS) INSTRUMENTATION

TEXT 3.3.1.2 4 01/23/2018
Title: INSTRUMENTATION SOURCE RANGE MONITOR (SRM) INSTRUMENTATION

TEXT 3.3.2.1 4 11/16/2016
Title: INSTRUMENTATION CONTROL ROD BLOCK INSTRUMENTATION

TEXT 3.3.2.2 3 11/16/2016
Title: INSTRUMENTATION FEEDWATER - MAIN TURBINE HIGH WATER LEVEL TRIP INSTRUMENTATION

TEXT 3.3.3.1 9 11/16/2016
Title: INSTRUMENTATION POST ACCIDENT MONITORING (PAM) INSTRUMENTATION

TEXT 3.3.3.2 2 11/16/2016
Title: INSTRUMENTATION REMOTE SHUTDOWN SYSTEM

TEXT 3.3.4.1 2 11/16/2016
Title: INSTRUMENTATION END OF CYCLE RECIRCULATION PUMP TRIP (EOC-RPT) INSTRUMENTATION

SSSES MANUAL

Manual Name: TSB2

Manual Title: TECHNICAL SPECIFICATIONS BASES UNIT 2 MANUAL

TEXT 3.3.4.2 1 11/16/2016
Title: INSTRUMENTATION ANTICIPATED TRANSIENT WITHOUT SCRAM RECIRCULATION PUMP TRIP (ATWS-RPT) INSTRUMENTATION

TEXT 3.3.5.1 6 11/16/2016
Title: INSTRUMENTATION EMERGENCY CORE COOLING SYSTEM (ECCS) INSTRUMENTATION

TEXT 3.3.5.2 1 11/16/2016
Title: INSTRUMENTATION REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM INSTRUMENTATION

TEXT 3.3.6.1 8 11/16/2016
Title: INSTRUMENTATION PRIMARY CONTAINMENT ISOLATION INSTRUMENTATION

TEXT 3.3.6.2 5 11/16/2016
Title: INSTRUMENTATION SECONDARY CONTAINMENT ISOLATION INSTRUMENTATION

TEXT 3.3.7.1 3 11/16/2016
Title: INSTRUMENTATION CONTROL ROOM EMERGENCY OUTSIDE AIR SUPPLY (CREOAS) SYSTEM INSTRUMENTATION

TEXT 3.3.8.1 4 11/16/2016
Title: INSTRUMENTATION LOSS OF POWER (LOP) INSTRUMENTATION

TEXT 3.3.8.2 1 11/16/2016
Title: INSTRUMENTATION REACTOR PROTECTION SYSTEM (RPS) ELECTRIC POWER MONITORING

TEXT 3.4.1 5 11/16/2016
Title: REACTOR COOLANT SYSTEM (RCS) RECIRCULATION LOOPS OPERATING

TEXT 3.4.2 4 11/16/2016
Title: REACTOR COOLANT SYSTEM (RCS) JET PUMPS

TEXT 3.4.3 3 01/13/2012
Title: REACTOR COOLANT SYSTEM (RCS) SAFETY/RELIEF VALVES (S/RVS)

TEXT 3.4.4 1 11/16/2016
Title: REACTOR COOLANT SYSTEM (RCS) RCS OPERATIONAL LEAKAGE

SSES MANUAL

Manual Name: TSB2

Manual Title: TECHNICAL SPECIFICATIONS BASES UNIT 2 MANUAL

TEXT 3.6.4.2	13	04/24/2018	
Title: CONTAINMENT SYSTEMS SECONDARY CONTAINMENT ISOLATION VALVES (SCIVS)			
		LDCN	5277
TEXT 3.6.4.3	6	09/15/2017	
Title: CONTAINMENT SYSTEMS STANDBY GAS TREATMENT (SGT) SYSTEM			
TEXT 3.7.1	7	03/01/2017	
Title: PLANT SYSTEMS RESIDUAL HEAT REMOVAL SERVICE WATER (RHRSW) SYSTEM AND THE ULTIMATE HEAT SINK (UHS)			
TEXT 3.7.2	3	11/16/2016	
Title: PLANT SYSTEMS EMERGENCY SERVICE WATER (ESW) SYSTEM			
TEXT 3.7.3	3	09/15/2017	
Title: PLANT SYSTEMS CONTROL ROOM EMERGENCY OUTSIDE AIR SUPPLY (CREOAS) SYSTEM			
TEXT 3.7.4	1	11/16/2016	
Title: PLANT SYSTEMS CONTROL ROOM FLOOR COOLING SYSTEM			
TEXT 3.7.5	2	11/16/2016	
Title: PLANT SYSTEMS MAIN CONDENSER OFFGAS			
TEXT 3.7.6	4	11/16/2016	
Title: PLANT SYSTEMS MAIN TURBINE BYPASS SYSTEM			
TEXT 3.7.7	2	11/16/2016	
Title: PLANT SYSTEMS SPENT FUEL STORAGE POOL WATER LEVEL			
TEXT 3.7.8	1	11/16/2016	
Title: MAINE TURBINE PRESSURE REGULATION SYSTEM			
TEXT 3.8.1	11	02/27/2018	
Title: ELECTRICAL POWER SYSTEMS AC SOURCES - OPERATING			
TEXT 3.8.2	0	11/18/2002	
Title: ELECTRICAL POWER SYSTEMS AC SOURCES - SHUTDOWN			

SSES MANUAL

Manual Name: TSB2

Manual Title: TECHNICAL SPECIFICATIONS BASES UNIT 2 MANUAL

TEXT 3.8.3	6	12/14/2017	Title: ELECTRICAL POWER SYSTEMS DIESEL FUEL OIL LUBE OIL AND STARTING AIR
TEXT 3.8.4	4	11/16/2016	Title: ELECTRICAL POWER SYSTEMS DC SOURCES - OPERATING
TEXT 3.8.5	1	12/14/2006	Title: ELECTRICAL POWER SYSTEMS DC SOURCES - SHUTDOWN
TEXT 3.8.6	2	11/16/2016	Title: ELECTRICAL POWER SYSTEMS BATTERY CELL PARAMETERS
TEXT 3.8.7	6	03/01/2017	Title: ELECTRICAL POWER SYSTEMS DISTRIBUTION SYSTEMS - OPERATING
TEXT 3.8.8	1	11/16/2016	Title: ELECTRICAL POWER SYSTEMS DISTRIBUTION SYSTEMS - SHUTDOWN
TEXT 3.9.1	1	11/16/2016	Title: REFUELING OPERATIONS REFUELING EQUIPMENT INTERLOCKS
TEXT 3.9.2	2	11/16/2016	Title: REFUELING OPERATIONS REFUEL POSITION ONE-ROD-OUT INTERLOCK
TEXT 3.9.3	1	11/16/2016	Title: REFUELING OPERATIONS CONTROL ROD POSITION
TEXT 3.9.4	0	11/18/2002	Title: REFUELING OPERATIONS CONTROL ROD POSITION INDICATION
TEXT 3.9.5	1	11/16/2016	Title: REFUELING OPERATIONS CONTROL ROD OPERABILITY - REFUELING
TEXT 3.9.6	2	11/16/2016	Title: REFUELING OPERATIONS REACTOR PRESSURE VESSEL (RPV) WATER LEVEL

SUSQUEHANNA STEAM ELECTRIC STATION
LIST OF EFFECTIVE SECTIONS (TECHNICAL SPECIFICATIONS BASES)

<u>Section</u>	<u>Title</u>	<u>Revision</u>
TOC	Table of Contents	23
B 2.0	SAFETY LIMITS (SLs)	
B2.1.1	Reactor Core SLs.....	5
B2.1.2	Reactor Coolant System (RCS) Pressure SL.....	1
B 3.0	LCO AND SR APPLICABILITY BASES	3
B 3.1	REACTIVITY CONTROL SYSTEMS	
B3.1.1	Shutdown Margin (SDM).....	2
B3.1.2	Reactivity Anomalies.....	1
B3.1.3	Control Rod OPERABILITY.....	3
B3.1.4	Control Rod Scram Times	5
B3.1.5	Control Rod Scram Accumulators	2
B3.1.6	Rod Pattern Control.....	4
B3.1.7	Standby Liquid Control (SLC) System.....	3
B3.1.8	Scram Discharge Volume (SDV) Vent and Drain Valves	4
B 3.2	POWER DISTRIBUTION LIMITS	
B3.2.1	Average Planar Linear Heat Generation Rate (APLHGR)	5
B3.2.2	Minimum Critical Power Ratio (MCPR)	4
B3.2.3	Linear Heat Generation Rate (LHGR)	3
B 3.3	INSTRUMENTATION	
B3.3.1.1	Reactor Protection System (RPS) Instrumentation	6
B3.3.1.2	Source Range Monitor (SRM) Instrumentation	4
B3.3.2.1	Control Rod Block Instrumentation.....	4
B3.3.2.2	Feedwater – Main Turbine High Water Level Trip Instrumentation	3
B3.3.3.1	Post Accident Monitoring (PAM) Instrumentation.....	9
B3.3.3.2	Remote Shutdown System.....	2
B3.3.4.1	End of Cycle Recirculation Pump Trip (EOC-RPT) Instrumentation	2
B3.3.4.2	Anticipated Transient Without Scram Recirculation Pump Trip (ATWS-RPT) Instrumentation.....	1
B3.3.5.1	Emergency Core Cooling System (ECCS) Instrumentation	6
B3.3.5.2	Reactor Core Isolation Cooling (RCIC) System Instrumentation	1
B3.3.6.1	Primary Containment Isolation Instrumentation	8
B3.3.6.2	Secondary Containment Isolation Instrumentation.....	5
B3.3.7.1	Control Room Emergency Outside Air Supply (CREOAS) System Instrumentation.....	3
B3.3.8.1	Loss of Power (LOP) Instrumentation	4
B3.3.8.2	Reactor Protection System (RPS) Electric Power Monitoring	1

SUSQUEHANNA STEAM ELECTRIC STATION
LIST OF EFFECTIVE SECTIONS (TECHNICAL SPECIFICATIONS BASES)

<u>Section</u>	<u>Title</u>	<u>Revision</u>
B 3.4	REACTOR COOLANT SYSTEM (RCS)	
B3.4.1	Recirculation Loops Operating.....	5
B3.4.2	Jet Pumps	4
B3.4.3	Safety/Relief Valves (S/RVs).....	4
B3.4.4	RCS Operational LEAKAGE	1
B3.4.5	RCS Pressure Isolation Valve (PIV) Leakage	4
B3.4.6	RCS Leakage Detection Instrumentation	5
B3.4.7	RCS Specific Activity.....	3
B3.4.8	Residual Heat Removal (RHR) Shutdown Cooling System – Hot Shutdown.....	3
B3.4.9	Residual Heat Removal (RHR) Shutdown Cooling System – Cold Shutdown.....	2
B3.4.10	RCS Pressure and Temperature (P/T) Limits	5
B3.4.11	Reactor Steam Dome Pressure	1
B 3.5	EMERGENCY CORE COOLING SYSTEMS (ECCS) AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM	
B3.5.1	ECCS – Operating.....	5
B3.5.2	ECCS – Shutdown	3
B3.5.3	RCIC System.....	5
B 3.6	CONTAINMENT SYSTEMS	
B3.6.1.1	Primary Containment.....	6
B3.6.1.2	Primary Containment Air Lock.....	2
B3.6.1.3	Primary Containment Isolation Valves (PCIVs).....	16
B3.6.1.4	Containment Pressure.....	2
B3.6.1.5	Drywell Air Temperature.....	2
B3.6.1.6	Suppression Chamber-to-Drywell Vacuum Breakers	1
B3.6.2.1	Suppression Pool Average Temperature	3
B3.6.2.2	Suppression Pool Water Level.....	1
B3.6.2.3	Residual Heat Removal (RHR) Suppression Pool Cooling	2
B3.6.2.4	Residual Heat Removal (RHR) Suppression Pool Spray.....	1
B3.6.3.1	Not Used	2
B3.6.3.2	Drywell Air Flow System.....	3
B3.6.3.3	Primary Containment Oxygen Concentration.....	3
B3.6.4.1	Secondary Containment.....	14
B3.6.4.2	Secondary Containment Isolation Valves (SCIVs).....	13
B3.6.4.3	Standby Gas Treatment (SGT) System	6

SUSQUEHANNA STEAM ELECTRIC STATION
LIST OF EFFECTIVE SECTIONS (TECHNICAL SPECIFICATIONS BASES)

<u>Section</u>	<u>Title</u>	<u>Revision</u>
B 3.7	PLANT SYSTEMS	
B3.7.1	Residual Heat Removal Service Water (RHRSW) System and the Ultimate Heat Sink (UHS).....	7
B3.7.2	Emergency Service Water (ESW) System	3
B3.7.3	Control Room Emergency Outside Air Supply (CREOAS) System.....	3
B3.7.4	Control Room Floor Cooling System.....	1
B3.7.5	Main Condenser Offgas	2
B3.7.6	Main Turbine Bypass System.....	4
B3.7.7	Spent Fuel Storage Pool Water Level.....	2
B3.7.8	Main Turbine Pressure Regulation System.....	1
B 3.8	ELECTRICAL POWER SYSTEM	
B3.8.1	AC Sources – Operating	11
B3.8.2	AC Sources – Shutdown	0
B3.8.3	Diesel Fuel Oil, Lube Oil, and Starting Air.....	6
B3.8.4	DC Sources – Operating	4
B3.8.5	DC Sources – Shutdown.....	1
B3.8.6	Battery Cell Parameters	2
B3.8.7	Distribution Systems – Operating.....	6
B3.8.8	Distribution Systems – Shutdown.....	1
B 3.9	REFUELING OPERATIONS	
B3.9.1	Refueling Equipment Interlocks.....	1
B3.9.2	Refuel Position One-Rod-Out Interlock.....	1
B3.9.3	Control Rod Position	1
B3.9.4	Control Rod Position Indication.....	0
B3.9.5	Control Rod OPERABILITY – Refueling	1
B3.9.6	Reactor Pressure Vessel (RPV) Water Level.....	2
B3.9.7	Residual Heat Removal (RHR) – High Water Level.....	1
B3.9.8	Residual Heat Removal (RHR) – Low Water Level.....	1
B 3.10	SPECIAL OPERATIONS	
B3.10.1	Inservice Leak and Hydrostatic Testing Operation.....	1
B3.10.2	Reactor Mode Switch Interlock Testing.....	1
B3.10.3	Single Control Rod Withdrawal – Hot Shutdown.....	1
B3.10.4	Single Control Rod Withdrawal – Cold Shutdown.....	1
B3.10.5	Single Control Rod Drive (CRD) Removal – Refueling	1
B3.10.6	Multiple Control Rod Withdrawal – Refueling.....	1
B3.10.7	Control Rod Testing – Operating.....	1
B3.10.8	SHUTDOWN MARGIN (SDM) Test – Refueling	3

B 3.6 CONTAINMENT SYSTEMS

B 3.6.4.2 Secondary Containment Isolation Valves (SCIVs)

BASES

BACKGROUND The function of the SCIVs, in combination with other accident mitigation systems, is to limit fission product release during and following postulated Design Basis Accidents (DBAs) (Ref. 1). Secondary containment isolation within the time limits specified for those isolation valves designed to close automatically ensures that fission products that leak from primary containment into secondary containment following a DBA, or that are released during certain operations when primary containment is not required to be OPERABLE or take place outside primary containment, are maintained within the secondary containment boundary.

The OPERABILITY requirements for SCIVs help ensure that an adequate secondary containment boundary is maintained during and after an accident by minimizing potential paths to the environment. These isolation devices consist of either passive devices or active (automatic) devices. Manual valves or dampers, de-activated automatic valves or dampers secured in their closed position (including check valves with flow through the valve secured), and blind flanges are considered passive devices.

Automatic SCIVs close on a secondary containment isolation signal to establish a boundary for untreated radioactive material within secondary containment following a DBA or other accidents.

Other non-sealed penetrations which cross a secondary containment boundary are isolated by the use of valves in the closed position or blind flanges.

APPLICABLE SAFETY ANALYSES The SCIVs must be OPERABLE to ensure the secondary containment barrier to fission product releases is established. The principal accidents for which the secondary containment boundary is required are a loss of coolant accident (Ref. 1) and a fuel handling accident inside secondary containment (Ref. 2). The secondary containment performs no active function in response to either of these limiting events, but the boundary

(continued)

BASES

APPLICABLE
SAFETY
ANALYSES
(continued)

established by SCIVs is required to ensure that leakage from the primary containment is processed by the Standby Gas Treatment (SGT) System before being released to the environment.

Maintaining SCIVs OPERABLE with isolation times within limits ensures that fission products will remain trapped inside secondary containment so that they can be treated by the SGT System prior to discharge to the environment.

SCIVs satisfy Criterion 3 of the NRC Policy Statement (Ref. 3).

LCO

SCIVs that form a part of the secondary containment boundary are required to be OPERABLE. Depending on the configuration of the secondary containment only specific SCIVs are required. The SCIV safety function is related to control of offsite radiation releases resulting from DBAs.

The automatic isolation valves are considered OPERABLE when their isolation times are within limits and the valves actuate on an automatic isolation signal. The valves covered by this LCO, along with their associated stroke times, are listed in Table B 3.6.4.2-1.

The normally closed isolation valves or blind flanges are considered OPERABLE when manual valves are closed or open in accordance with appropriate administrative controls, automatic SCIVs are deactivated and secured in their closed position, or blind flanges are in place. These passive isolation valves or devices are listed in Table B3.6.4.2-2. Penetrations closed with sealants are considered part of the secondary containment boundary and are not considered penetration flow paths.

Certain plant piping systems (e.g., Service Water, RHR Service Water, Emergency Service Water, Feedwater, etc.) penetrate the secondary containment boundary. The intact piping within secondary containment provides a passive barrier which maintains secondary containment requirements. When the SDHR and temporary chiller system piping is connected and full of water, the piping forms the secondary containment boundary and the passive devices in TS Bases Table B3.6.4.2-2 are no longer required for these systems since the piping forms the barrier. During certain plant evolutions, piping systems may be drained and breached within secondary containment. During the pipe breach, system isolation valves can be used to provide secondary containment isolation. The isolation valve alignment will be controlled when the piping system is breached.

(continued)

BASES (continued)

APPLICABILITY In MODES 1, 2, and 3, a DBA could lead to a fission product release to the primary containment that leaks to the secondary containment. Therefore, the OPERABILITY of SCIVs is required.

In MODES 4 and 5, the probability and consequences of these events are reduced due to pressure and temperature limitations in these MODES. Therefore, maintaining SCIVs OPERABLE is not required in MODE 4 or 5, except for other situations under which significant radioactive releases can be postulated, such as during operations with a potential for draining the reactor vessel (OPDRVs), during CORE ALTERATIONS, or 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.

ACTIONS

The ACTIONS are modified by three Notes. The first Note allows penetration flow paths to be unisolated intermittently under administrative controls. These controls consist of stationing a dedicated operator, who is in continuous communication with the control room, at the controls of the isolation device. In this way, the penetration can be rapidly isolated when a need for secondary containment isolation is indicated.

The second Note provides clarification that for the purpose of this LCO separate Condition entry is allowed for each penetration flow path. This is acceptable, since the Required Actions for each Condition provide appropriate compensatory actions for each inoperable SCIV. Complying with the Required Actions may allow for continued operation, and subsequent inoperable SCIVs are governed by subsequent Condition entry and application of associated Required Actions.

The third Note ensures appropriate remedial actions are taken, if necessary, if the affected system(s) are rendered inoperable by an inoperable SCIV.

A.1 and A.2

In the event that there are one or more required penetration flow paths with one required SCIV inoperable, the affected penetration flow path(s) must be isolated. The method of isolation must include the use of at least one isolation barrier that cannot be adversely affected by a single active failure. Isolation barriers that meet this criterion are a closed and de-activated automatic SCIV, a closed manual valve, and a blind flange. For penetrations isolated in

(continued)

BASES

ACTIONS

A.1 and A.2 (continued)

accordance with Required Action A.1, the device used to isolate the penetration should be the closest available device to secondary containment. The Required Action must be completed within the 8 hour Completion Time. The specified time period is reasonable considering the time required to isolate the penetration, and the probability of a DBA, which requires the SCIVs to close, occurring during this short time is very low.

For affected penetrations that have been isolated in accordance with Required Action A.1, the affected penetration must be verified to be isolated on a periodic basis. This is necessary to ensure that secondary containment penetrations required to be isolated following an accident, but no longer capable of being automatically isolated, will be in the isolation position should an event occur. The Completion Time of once per 31 days is appropriate because the valves are operated under administrative controls and the probability of their misalignment is low. This Required Action does not require any testing or device manipulation. Rather, it involves verification that the affected penetration remains isolated.

Condition A is modified by a Note indicating that this Condition is only applicable to those penetration flow paths with two SCIVs. For penetration flow paths with one SCIV, Condition C provides the appropriate Required Actions.

Required Action A.2 is modified by a Note that applies to devices located in high radiation areas and allows them to be verified closed by use of administrative controls. Allowing verification by administrative controls is considered acceptable, since access to these areas is typically restricted. Therefore, the probability of misalignment, once they have been verified to be in the proper position, is low.

B.1

With two SCIVs in one or more penetration flow paths inoperable, the affected penetration flow path must be isolated within 4 hours. The method of isolation must

(continued)

BASES

ACTIONS

B.1 (continued)

include the use of at least one isolation barrier that cannot be adversely affected by a single active failure. Isolation barriers that meet this criterion are a closed and de-activated automatic valve, a closed manual valve, and a blind flange. The 4 hour Completion Time is reasonable considering the time required to isolate the penetration and the probability of a DBA, which requires the SCIVs to close, occurring during this short time, is very low.

The Condition has been modified by a Note stating that Condition B is only applicable to penetration flow paths with two isolation valves. For penetration flow paths with one SCIV, Condition C provides the appropriate Required Actions.

C.1 and C.2

With one or more required penetration flow paths with one required SCIV inoperable, the inoperable valve must be restored to OPERABLE status or the affected penetration flow path must be isolated. The method of isolation must include the use of at least one isolation barrier that cannot be adversely affected by a single active failure. Isolation barriers that meet this criterion are a closed and de-activated automatic valve, a closed manual valve, and a blind flange. A check valve may not be used to isolate the affected penetration. Required Action C.1 must be completed within the 4 hour Completion Time. The Completion Time of 4 hours is reasonable considering the relative stability of the system (hence, reliability) to act as a penetration isolation boundary and the relative importance of supporting secondary containment OPERABILITY during MODES 1, 2, and 3.

In the event the affected penetration flow path is isolated in accordance with Required Action C.1, the affected penetration must be verified to be isolated on a periodic basis. This is necessary to ensure that secondary containment penetrations required to be isolated following an accident are isolated.

The Completion Time of once per 31 days for verifying each affected penetration is isolated is appropriate because the

(continued)

BASES

ACTIONS

C.1 and C.2 (continued)

valves are operated under administrative controls and the probability of their misalignment is low.

Condition C is modified by a Note indicating that this Condition is only applicable to penetration flow paths with only one SCIV. For penetration flow paths with two SCIVs, Conditions A and B provide the appropriate Required Actions.

Required Action C.2 is modified by a Note that applies to valves and blind flanges located in high radiation areas and allows them to be verified by use of administrative means. Allowing verification by administrative means is considered acceptable, since access to these areas is typically restricted. Therefore, the probability of misalignment of these valves, once they have been verified to be in the proper position, is low.

D.1 and D.2

If any Required Action and associated Completion Time cannot be met, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours and to MODE 4 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

E.1, E.2, and E.3

If any Required Action and associated Completion Time are not met, the plant must be placed in a condition in which the LCO does not apply. If applicable, CORE ALTERATIONS and the movement of irradiated fuel assemblies in the secondary containment must be immediately suspended. Suspension of these activities shall not preclude completion of movement of a component to a safe position. Also, if applicable, actions must be immediately initiated to suspend OPDRVs in order to minimize the probability of a vessel draindown and the subsequent potential for fission product release. Actions must continue until OPDRVs are suspended.

(continued)

BASES

ACTIONS

E.1, E.2, and E.3 (continued)

Required Action E.1 has been modified by a Note stating that LCO 3.0.3 is not applicable. If moving irradiated fuel assemblies while in MODE 4 or 5, LCO 3.0.3 would not specify any action. If moving fuel while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, in either case, inability to suspend movement of irradiated fuel assemblies would not be a sufficient reason to require a reactor shutdown.

SURVEILLANCE
REQUIREMENTS

SR 3.6.4.2.1

This SR verifies that each secondary containment manual isolation valve and blind flange that is required to be closed during accident conditions is closed. The SR helps to ensure that post accident leakage of radioactive fluids or gases outside of the secondary containment boundary is within design limits. This SR does not require any testing or valve manipulation. Rather, it involves verification (typically visual) that those required SCIVs in secondary containment that are capable of being mispositioned are in the correct position.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

Two Notes have been added to this SR. The first Note applies to valves and blind flanges located in high radiation areas and allows them to be verified by use of administrative controls. Allowing verification by administrative controls is considered acceptable, since access to these areas is typically restricted during MODES 1, 2, and 3 for ALARA reasons. Therefore, the probability of misalignment of these SCIVs, once they have been verified to be in the proper position, is low.

A second Note has been included to clarify that SCIVs that are open under administrative controls are not required to meet the SR during the time the SCIVs are open.

(continued)

BASES

SURVEILLANCE
REQUIREMENTS
(continued)

SR 3.6.4.2.2

SCIVs with maximum isolation times specified in Table B 3.6.2.4-1 are tested to verify that the isolation time is within limits to demonstrate OPERABILITY. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program. Automatic SCIVs without maximum isolation times specified in Table B 3.6.4.2-1 are tested under the requirements of SR 3.6.4.2.3. The isolation time test ensures that the SCIV will isolate in a time period less than or equal to that assumed in the safety analyses.

SR 3.6.4.2.3

Verifying that each automatic required SCIV closes on a secondary containment isolation signal is required to prevent leakage of radioactive material from secondary containment following a DBA or other accidents. This SR ensures that each automatic SCIV will actuate to the isolation position on a secondary containment isolation signal. The LOGIC SYSTEM FUNCTIONAL TEST in SR 3.3.6.2.5 overlaps this SR to provide complete testing of the safety function. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

REFERENCES

1. FSAR, Section 6.2.
 2. FSAR, Section 15.
 3. Final Policy Statement on Technical Specifications Improvements, July 22, 1993 (58 FR 39132).
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Table B 3.6.4.2-1
Secondary Containment Ventilation System
Automatic Isolation Dampers
 (Page 1 of 1)

Reactor Building Zone	Valve Number	Valve Description	Type of Valve	Maximum Isolation Time (Seconds)
I	HD-17586 A&B	Supply System Dampers	Automatic Isolation Damper	10.0
I	HD-17524 A&B	Filtered Exhaust System Dampers	Automatic Isolation Damper	10.0
I	HD-17576A&B	Unfiltered Exhaust System Dampers	Automatic Isolation Damper	10.0
II	HD-27586 A&B	Supply System Dampers	Automatic Isolation Damper	10.0
II	HD-27524 A&B	Filtered Exhaust System Dampers	Automatic Isolation Damper	10.0
II	HD-27576 A&B	Unfiltered Exhaust System Dampers	Automatic Isolation Damper	10.0
III	HD-17564 A&B	Supply System Dampers	Automatic Isolation Damper	14.0
III	HD-17514 A&B	Filtered Exhaust System Dampers	Automatic Isolation Damper	6.5
III	HD-17502 A&B	Unfiltered Exhaust System Dampers	Automatic Isolation Damper	6.0
III	HD-27564 A&B	Supply System Dampers	Automatic Isolation Damper	14.0
III	HD-27514 A&B	Filtered Exhaust System Dampers	Automatic Isolation Damper	6.5
III	HD-27502 A&B	Unfiltered Exhaust System Dampers	Automatic Isolation Damper	6.0
N/A	HD-17534A	Zone 3 Airlock I-606	Automatic Isolation Damper	N/A
N/A	HD-17534B	Zone 3 Airlock I-611	Automatic Isolation Damper	N/A
N/A	HD-17534D	Zone 3 Airlock I-803	Automatic Isolation Damper	N/A
N/A	HD-17534E	Zone 3 Airlock I-805	Automatic Isolation Damper	N/A
N/A	HD-17534F	Zone 3 Airlock I-617	Automatic Isolation Damper	N/A
N/A	HD-17534H	Zone 3 Airlock I-618	Automatic Isolation Damper	N/A
N/A	HD-27534A	Zone 3 Airlock II-606	Automatic Isolation Damper	N/A
N/A	HD-27534D	Zone 3 Airlock II-803	Automatic Isolation Damper	N/A
N/A	HD-27534E	Zone 3 Airlock II-805	Automatic Isolation Damper	N/A
N/A	HD-27534G	Zone 3 Airlock C-806	Automatic Isolation Damper	N/A
N/A	HD-27534H	Zone 3 Airlock II-618	Automatic Isolation Damper	N/A
N/A	HD-27534I	Zone 3 Airlock II-609	Automatic Isolation Damper	N/A

Table B 3.6.4.2-2
Secondary Containment Ventilation System
Passive Isolation Valves or Devices
(Page 1 of 4)

Device Number	Device Description	Area/Elev.	Required Position / Notes
X-29-2-44	SDHR System to Fuel Pool Cooling	Yard/670	Blind Flanged / Note 1
X-29-2-45	SDHR System to Fuel Pool Cooling	Yard/670	Blind Flanged / Note 1
110176	SDHR Supply Drain Vlv	29/670	Closed Manual Iso Valve / Note 1
110186	SDHR Discharge Drain Vlv	29/670	Closed Manual Iso Valve / Note 1
110180	SDHR Supply Vent Vlv	29/749	Closed Manual Iso Valve / Note 1
110181	SDHR Discharge Fill Vlv	27/749	Closed Manual Iso Valve / Note 1
110182	SDHR Discharge Vent Vlv	27/749	Closed Manual Iso Valve / Note 1
110187	SDHR Supply Fill Vlv	29/749	Closed Manual Iso Valve / Note 1
210186	SDHR Supply Drain Vlv	33/749	Closed Manual Iso Valve / Note 1
210187	SDHR Supply Vent Vlv	33/749	Closed Manual Iso Valve / Note 1
210191	SDHR Discharge Vent Vlv	30/749	Closed Manual Iso Valve / Note 1
210192	SDHR Discharge Drain Vlv	30/749	Closed Manual Iso Valve / Note 1
210193	SDHR Discharge Vent Vlv	33/749	Closed Manual Iso Valve / Note 1
X-29-2-46	Temporary Chiller to RBCW	Yard/670	Blind Flanged / Note 2
X-29-2-47	Temporary Chiller to RBCW	Yard/670	Blind Flanged / Note 2
X-29-5-95	Temporary Chiller to Unit 1 RBCW	29/749	Blind Flanged / Note 2
X-29-5-96	Temporary Chiller to Unit 1 RBCW	29/749	Blind Flanged / Note 2
X-29-5-91	Temporary Chiller to Unit 2 RBCW	33/749	Blind Flanged / Note 2
X-29-5-92	Temporary Chiller to Unit 2 RBCW	33/749	Blind Flanged / Note 2
187388	RBCW Temp Chiller Discharge Iso Vlv	29/670	Closed Manual Iso Valve / Note 2
187389	RBCW Temp Chiller Supply Iso Vlv	29/670	Closed Manual Iso Valve / Note 2
187390	RBCW Temp Chiller Supply Drain Vlv	29/670	Closed Manual Iso Valve / Note 2
187391	RBCW Temp Chiller Discharge Drain Vlv	29/670	Closed Manual Iso Valve / Note 2
X-28-2-3000	Utility Penetration to Unit 1 East Stairwell	Yard/670	Blind Flanged / Note 3
X-29-2-48	Utility Penetration to Unit 1 RR Bay	Yard/670	Capped / Note 5
X-33-2-3000	Utility Penetration to Unit 2 East Stairwell	Yard/670	Blind Flanged / Note 4
X-28-2-3000	Utility Penetration to Unit 1 East Stairwell	28/670	Blind Flanged / Note 3
X-29-2-48	Utility Penetration to Unit 1 RR Bay	29/670	Capped / Note 5
X-33-2-3000	Utility Penetration to Unit 2 East Stairwell	33/670	Blind Flanged / Note 4
X-29-3-54	Utility Penetration to Unit 1 RBCCW Hx Area	27/683	Blind Flanged / Note 6
X-29-3-55	Utility Penetration to Unit 1 RBCCW Hx Area	27/683	Blind Flanged / Note 6
X-29-5-97	Utility Penetration from Unit 1 RR Bay to Unit 2 Elev. 749	33/749	Capped
X-27-6-92	Instrument Tubing Stubs	27/779'	Capped
X-29-7-4	1" Spare Conduit Threaded Plug	29/818'	Installed
X-30-6-72	Instrument Tubing Stubs	30/779'	Capped
X-30-6-1002	Stairwell #214 Rupture Disc	30/779'	Installed Intact
X-30-6-1003	Airlock I-609 Rupture Disc	30/779'	Installed Intact
X-25-6-1008	Airlock I-606 Rupture Disc	25/779'	Installed Intact
X-29-4-D1-B	Penetration at Door 4330	29/719'	Blind Flange Installed
X-29-4-D1-A	Penetration at Door 4330	29/719'	Blind Flange Installed
X-29-4-D1-B	Penetration at Door 404	33/719'	Blind Flange Installed
X-29-4-D1-A	Penetration at Door 404	33/719'	Blind Flange Installed

Table B 3.6.4.2-2
Secondary Containment Ventilation System
Passive Isolation Valves or Devices
 (Page 2 of 4)

Device Number	Device Description	Area/Elev.	Required Position / Notes
HD17534C	Airlock I-707 Blind Flange	28/799'	Blind Flange Installed
HD27534C	Airlock II-707 Blind Flange	33/799'	Blind Flange Installed
XD-17513	Isolation damper for Railroad Bay Zone III HVAC Supply	29/799'	Position is dependent on Railroad Bay alignment
XD-17514	Isolation damper for Railroad Bay Zone III HVAC Exhaust	29/719'	Position is dependent on Railroad Bay alignment
XD-12301	PASS Air Flow Damper	11/729'	Closed Damper
XD-22301	PASS Air Flow Damper	22/729'	Closed Damper
161827	HPCI Blowout Steam Vent Drain Valve	25/645'	Closed Manual Iso Valve / Note 3
161828	RCIC Blowout Steam Vent Drain Valve	28/645'	Closed Manual Iso Valve / Note 3
161829	'A' RHR Blowout Steam Vent Drain Valve	29/645'	Closed Manual Iso Valve / Note 3
161830	'B' RHR Blowout Steam Vent Drain Valve	28/645'	Closed Manual Iso Valve / Note 3
261820	RCIC Blowout Steam Vent Drain Valve	33/645'	Closed Manual Iso Valve / Note 4
261821	'A' RHR Blowout Steam Vent Drain Valve	34/645'	Closed Manual Iso Valve / Note 4
261822	'B' RHR Blowout Steam Vent Drain Valve	33/645'	Closed Manual Iso Valve / Note 4
2LRW1810L	Zone III Floor Drain	34-818	Plugged / Note 7
2LRW1810M	Zone III Floor Drain	34-818	Plugged / Note 7
2LRW1810N	Zone III Floor Drain	34-818	Plugged / Note 7
2LRW1810R	Zone III Floor Drain	34-818	Plugged / Note 7
2LRW1810S	Zone III Floor Drain	34-818	Plugged / Note 7
2LRW1703A	Zone II Floor Drain	34-799	Plugged / Note 7
2LRW1615A	Zone II Floor Drain	34-779	Plugged / Note 7
2LRW100A	Zone II Floor Drain	34-670	Plugged / Note 7
2LRW100B	Zone II Floor Drain	34-670	Plugged / Note 7
2LRW100C	Zone II Floor Drain	34-670	Plugged / Note 7
2LRW100D	Zone II Floor Drain	34-670	Plugged / Note 7
2LRW100E	Zone II Floor Drain	34-670	Plugged / Note 7
2LRW100F	Zone II Floor Drain	34-670	Plugged / Note 7
2LRW100G	Zone II Floor Drain	34-670	Plugged / Note 7

Table B 3.6.4.2-2
Secondary Containment Ventilation System
Passive Isolation Valves or Devices
 (Page 3 of 4)

Device Number	Device Description	Area/Elev.	Required Position / Notes
1LRWI810U	Zone III Floor Drain	29-818	Plugged / Note 7
1LRWI1810V	Zone III Floor Drain	29-818	Plugged / Note 7
1LRWI1810W	Zone III Floor Drain	29-818	Plugged / Note 7
1LRWI810X	Zone III Floor Drain	29-818	Plugged / Note 7
1LRWI810Y	Zone III Floor Drain	29-818	Plugged / Note 7
1LRWI810Z	Zone III Floor Drain	29-818	Plugged / Note 7
1LRWI810FF	Zone III Floor Drain	29-818	Plugged / Note 7
1LRWI810GG	Zone III Floor Drain	29-818	Plugged / Note 7
1LRWI810HH	Zone III Floor Drain	29-818	Plugged / Note 7
1LRWI810JJ	Zone III Floor Drain	29-818	Plugged / Note 7
1LRWI810KK	Zone III Floor Drain	29-818	Plugged / Note 7
1LRWI615A	Zone I, Zone III, or No Zone Floor Drain	29-779	Plugged / Note 7
1LRWI100A	Zone I, Zone III, or No Zone Floor Drain	29-670	Plugged / Note 7
1LRWI100B	Zone I, Zone III, or No Zone Floor Drain	29-670	Plugged / Note 7
1LRWI100C	Zone I, Zone III, or No Zone Floor Drain	29-670	Plugged / Note 7
1LRWI100D	Zone I, Zone III, or No Zone Floor Drain	29-670	Plugged / Note 7
1LRWI100E	Zone I, Zone III, or No Zone Floor Drain	29-670	Plugged / Note 7
1LRWI100F	Zone I, Zone III, or No Zone Floor Drain	29-670	Plugged / Note 7
1LRWI100G	Zone I, Zone III, or No Zone Floor Drain	29-670	Plugged / Note 7
257328 OR 257336	HCVS Rupture Disc Burst Connection Isolation Valves	21/686'	Closed Manual Iso Valve / Note 4
157328 OR 157336	HCVS Rupture Disc Burst Connection Isolation Valves	21/686'	Closed Manual Iso Valve / Note 3

Table B 3.6.4.2-2
Secondary Containment Ventilation System
Passive Isolation Valves or Devices
(Page 4 of 4)

Note 1: The two blind flanges on the SDHR penetrations (blind flanges for device number X-29-2-44 and X-29-2-45) and all the closed manual valves for the SDHR system (110176, 110186, 110180, 110181, 110182, 110187, 210186, 210187, 210191, 210192, 210193) can each be considered as a separate secondary containment isolation device for the SDHR penetrations. If one or both of the blind flanges is removed and all the above identified manual valves for the SDHR system are closed, the appropriate LCO should be entered for one inoperable SCIV in a penetration flow path with two SCIVs. With the blind flange removed, the manual valves could be opened intermittently under administrative controls per the Technical Specification Note. When both SDHR blind flanges are installed, opening of the manual valves for the SDHR system will be controlled to prevent cross connecting ventilation zones. When the manual valves for the SDHR system are open in this condition, the appropriate LCO should be entered for one inoperable SCIV in a penetration flow path with two SCIVs. When the SDHR system piping is connected and full of water, the piping forms the secondary containment boundary and the above listed SCIVs in Table B3.6.4.2-2 are no longer required for this system since the piping forms the barrier.

Note 2: Due to the multiple alignments of the RBCW temporary chiller, different devices will perform the SCIV function depending on the RBCW configuration. There are three devices/equipment that can perform the SCIV function for the RBCW temporary chiller supply penetration. The first SCIV for the RBCW temporary chiller supply penetration is the installed blind flange on penetration X-29-2-47. The second SCIV for the RBCW temporary chiller supply penetration is isolation valve 187389. The third SCIV for the temporary RBCW chiller supply penetration is closed drain valve 187390 and an installed blind flange on penetrations X-29-5-92 and/or X-29-5-96. Since there are effectively three SCIVs, any two can be used to define the SCIV for the penetration. Removal of one of the two required SCIVs requires entry into the appropriate LCO for one inoperable SCIV in a penetration flow path with two SCIVs. Opening of drain valve 187390 and operation of blank flanges X-29-5-96 and X-29-5-92 will be controlled to prevent cross connecting ventilation zones. These three SCIVs prevent air leakage into secondary containment. The isolation of the penetration per the Technical Specification requirement is to assure that one of the above SCIVs is closed so that there is no air leakage into secondary containment.

There are three devices/equipment that can perform the SCIV function for the RBCW temporary chiller return penetration. The first SCIV for the RBCW temporary chiller return penetration is the installed blind flange on penetration X-29-2-46. The second SCIV for the RBCW temporary chiller return penetration is isolation valve 187388. The third SCIV for the temporary RBCW chiller return penetration is closed drain valve 187391 and an installed blind flange on penetrations X-29-5-91 and/or X-29-5-95. Since there are effectively three SCIVs, any two can be used to define the SCIV for the penetration. Removal of one of the two required SCIVs requires entry into the appropriate LCO for one inoperable SCIV in a penetration flow path with two SCIVs. Opening of drain valve 187391 and operation of blank flanges X-29-5-91 and X-29-5-95 will be controlled to prevent cross connecting ventilation zones. These three SCIVs prevent air leakage into secondary containment. The isolation of the penetration per the Technical Specification requirement is to assure that one of the above SCIVs is closed so that there is no air leakage into secondary containment.

When the RBCW temporary chiller piping is connected and full of water, the piping inside secondary containment forms the secondary containment boundary and the above listed SCIVs in Table B3.6.4.2-2 are no longer required for this system.

Note 3: These penetrations connect Secondary Containment Zone I to a No-Zone. When Secondary Containment Zone I is isolated from the recirculation plenum, the above listed SCIVs in Table B3.6.4.2-2 are no longer required.

Note 4: These penetrations connect Secondary Containment Zone II to a No-Zone. When Secondary Containment Zone II is isolated from the recirculation plenum, the above listed SCIVs in Table B3.6.4.2-2 are no longer required.

Note 5: These penetrations connect the Railroad Bay to a No-Zone. When the Railroad Bay is a No-Zone, the above listed SCIVs in Table B3.6.4.2-2 are no longer required.

Note 6: These penetrations connect Secondary Containment Zone I to the Railroad Bay. The above listed SCIVs in Table B3.6.4.2-2 are not required if the Railroad Bay is a No-Zone and Zone I is isolated from the recirculation plenum OR if the Railroad Bay is aligned to Zone I.

Note 7: Due to drain header containing multiple floor drains in different ventilation zones, drain plugs were installed in all of the drain header floor drains. To provide the passive Secondary Containment boundary, only drain plugs in one ventilation zone are required to be installed.