

ATTACHMENT 1

Supplemental Technical Specification Change

Surry Power Station
Units 1 and 2

8807260307 880718
PDR ADDCK 05000280
P PDC

3.8 CONTAINMENT

Applicability

Applies to the integrity and operating pressure of the reactor containment.

Objective

To define the limiting operating status of the reactor containment for unit operation.

Specification

A. Containment Integrity and Operating Pressure

1. The containment integrity, as defined in TS Section 1.0, shall not be violated unless the reactor is in the cold shutdown condition.*
2. The reactor containment shall not be purged whenever the Reactor Coolant System temperature is above 200°F.
3. The inside and outside isolation valves in the steam jet air ejector suction line shall be locked, sealed or otherwise secured closed whenever the Reactor Coolant System temperature is above 200°F.
4. The Reactor Coolant System temperature and pressure must not exceed 350°F and 450 psig, respectively, unless the air partial pressure in the containment is at a value equal to, or below, that specified in TS Figure 3.8-1.
5. The containment integrity shall not be violated when the reactor vessel head is unbolted unless a shutdown margin greater than 5 percent $\Delta k/k$ is maintained.

* In the event of failure of the personnel airlock inner door seal to meet the leakage test acceptance criteria, the outer personnel airlock door may be opened for a period of time not to exceed fifteen minutes with an annual cumulative time not to exceed one hour per year to allow access for the repair and retest of the inner door.

ATTACHMENT 2

Discussion of Supplemental Change

Discussion of Supplemental Change

Discussion of Proposed Change

As discussed in our submittal, Serial 88-100, dated April 26, 1988, access to the containment while in a subatmospheric condition is performed by equalizing and opening the airlock outer door and then closing and sealing the outer door. The pressure in the airlock is then equalized with the containment and the inner door is opened for the final access. This method ensures that at least one door on the personnel airlock is properly closed and sealed whenever the containment is in a subatmospheric condition. Interlocks provide additional assurance that the doors cannot be opened simultaneously while in a subatmospheric condition.

Following the final use of the airlock, the seals on the inner and outer personnel airlock doors are tested at equal to or greater than the peak calculated accident pressure. If the seal on the outer door fails to pass the acceptance criteria of the test, the inner door is verified to be properly closed and sealed and the outer door seal is repaired and retested. If the inner door seal fails, the outer door is verified to be properly closed and sealed. However, the only acceptable method for repair and retest of the inner seal is by reopening the outer door to allow access to the inner door seal. During this brief period, the containment integrity requirements as defined in T.S. Section 1.H.4 cannot be met since the inner door will be closed but may not be properly sealed.

The proposed Technical Specifications change will provide for the access to the inner door for repair and retest of the inner door. Upon entry into the personnel airlock, the outer door will be properly closed and sealed prior to initiating repair of the inner door.

Discussion of Supplement

The proposed change would permit the outer airlock door to be opened "briefly" to allow access for repair and retest of the inner door. The time that the outer door may be opened for such activities was not explicitly identified in the proposed change. As a result of discussions with the NRC, a time limit of fifteen minutes per entry and an annual cumulative time limit of one hour is proposed as a supplemental clarification to address the concern.

The 50.92 evaluation of the original submittal concluded that the proposed change did not constitute a significant safety hazard. That determination was based in part on the qualitative assessment that the probability of a design base accident occurring during the brief period of time that the outer door is opened for access to repair the inner door seal is insignificant. Clarifying the concept of brief access by specifying a time limit per entry and an annual cumulative time limit is more restrictive than the proposed change and therefore does not alter the conclusions of the initial 50.92 evaluation. As such, the initial 50.92 significant hazards consideration remains bounding.