



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402

CNL-19-060

August 29, 2019

10 CFR 50.90

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Watts Bar Nuclear Plant, Units 1 and 2
Facility Operating License Nos. NPF-90 and NPF-96
NRC Docket Nos. 50-390 and 50-391

Subject: Supplement to Application for Technical Specification Change Regarding Risk-Informed Justification for the Relocation of Specific Surveillance Frequency Requirements to a Licensee Controlled Program (WBN-TS-18-14) (EPID L-2018-LLA-0279)

- References:
1. TVA Letter to NRC, CNL-18-067, "Application for Technical Specification Change Regarding Risk-Informed Justification for the Relocation of Specific Surveillance Frequency Requirements to a Licensee Controlled Program (WBN-TS-18-14)," dated October 12, 2018 (ML18288A352)
 2. TVA Letter to NRC, CNL-19-035, "Response to Request for Additional Information Regarding Application for Technical Specification Change Regarding Risk-Informed Justification for the Relocation of Specific Surveillance Frequency Requirements to a Licensee Controlled Program (WBN-TS-18-14) (EPID L-2018-LLA-0279)," dated May 7, 2019 (ML19127A323)
 3. TVA Letter to NRC, CNL-19-054, "Correction to Application for Technical Specification Change Regarding Risk-Informed Justification for the Relocation of Specific Surveillance Frequency Requirements to a Licensee Controlled Program (WBN-TS-18-14) (EPID L-2018-LLA-0279)," dated June 6, 2019 (ML19157A302)
 4. NRC Letter to TVA, "Watts Bar Nuclear Plant Units 1 and 2 - Issuance of Amendment to Modify Technical Specification Surveillance Requirement 3.6.3.5 For Containment Purge Isolation Valves (EPID L-2018-LLA-0002)," dated January 28, 2019 (ML18327A005)
 5. TVA Letter to NRC, CNL-18-118, "Application to Revise Technical Specifications Regarding DC Electrical Systems TSTF-500, Revision 2, "DC Electrical Rewrite - Update to TSTF -360" (WBN-TS-18-09)," dated November 29, 2018 (ML18334A389)

In Reference 1, Tennessee Valley Authority (TVA) submitted a license amendment request (LAR) for the Watts Bar Nuclear Plant (WBN) Units 1 and 2 to modify the WBN Technical Specifications (TS) by relocating specific surveillance frequencies to a licensee-controlled program, (i.e., the Surveillance Frequency Control Program (SFCP)), in accordance with Technical Specification Task Force (TSTF) Standard Technical Specifications Change TSTF-425, Revision 3. In Reference 2, TVA submitted a response to a request for additional information (RAI) regarding this LAR. In Reference 3, TVA submitted a correction letter for an element of the LAR. Subsequent to these submittals, TVA identified a need to provide a supplement to the LAR, as described below.

With the issuance of WBN Units 1 and 2 License Amendments 123/24 (Reference 4), the Surveillance Requirement (SR) 3.6.3.5 Frequency was changed from "184 days AND Within 92 days after opening the valve" to "In accordance with the Containment Leakage Rate Testing Program." The Model Safety Evaluation for TSTF-425 (74 FR 31996) does not recognize the application of the SFCP to SR Frequencies that reference other approved programs for the specific interval (such as the Containment Leakage Rate Testing Program). Therefore, TVA is rescinding the proposed change to SR 3.6.3.5, as originally requested in Reference 1. The enclosure to this letter provides the change instructions to the affected pages of Reference 1. This change has no effect on the Reference 2 RAI response.

Furthermore, as described in the enclosure, additional changes are included for: 1) restoring the "Staggered Test Basis" definition initiated in Reference 3, 2) replacing an errant page in the WBN Unit 1 TS markup, and 3) providing an additional affected TS Bases page.

In Reference 5, TVA submitted a LAR for WBN Units 1 and 2 to adopt TSTF-500, "DC Electrical Rewrite - Update to TSTF-360." Reference 5 was developed in parallel with the LAR for TSTF-425, and TVA did not fully recognize the interaction between these LARs regarding the mutually affected SRs. Therefore, TVA requests that the NRC delay approval of the WBN TSTF-425 LAR (Reference 1, as supplemented) until after NRC approval of the WBN Units 1 and 2 TSTF-500 LAR (Reference 5), but no later than December 28, 2019. This requested extension is necessary to allow TVA to implement the TSTF-425 LAR following NRC approval of TSTF-500, which is the proper sequencing of these TS modifications. Furthermore, TVA plans to provide another supplement to the TSTF-425 LAR directly after the issuance of the TSTF-500 LAR License Amendment to reconcile the deleted, revised, and new SRs resulting from that amendment.

TVA regrets this inconvenience on the part of the NRC and recognizes that this requested extension may exceed the NRC one-year metric for approval of LARs. The lack of full awareness of the interaction between LARs that are currently under NRC review or are under development by TVA was entered into the TVA Corrective Action Program.

The enclosure to this letter does not change the no significant hazards consideration, nor the environmental considerations contained in Reference 1. Additionally, in accordance with 10 CFR 50.91(b)(1), TVA is sending a copy of this letter and the enclosure to the Tennessee Department of Environment and Conservation.

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There are no new regulatory commitments associated with this submittal. Please address any questions regarding this submittal to Kimberly D. Hulvey, TVA Fleet Licensing Manager, at 423-751-3275.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 29th day of August 2019.

Respectfully,



James T. Polickoski

Director, Nuclear Regulatory Affairs

Enclosure: License Amendment 123/24 and Miscellaneous Change Instructions to the October 12, 2018, License Amendment Request

cc (Enclosure):

NRC Regional Administrator - Region II
NRC Senior Resident Inspector - Watts Bar Nuclear Plant
NRC Project Manager – Watts Bar Nuclear Plant
Director, Division of Radiological Health - Tennessee State Department of Environment and Conservation

Enclosure

License Amendment 123/24 and Miscellaneous Change Instructions to the October 12, 2018,
License Amendment Request

(11 Pages)

Discussion

License Amendments 123/24 for Watts Bar (WBN) Unit 1/2 (ML18327A005) was issued January 28, 2019, after the submittal of the TSTF-425 license amendment request (LAR). With these amendments, the Surveillance Requirement (SR) 3.6.3.5 Frequency was changed from “184 days AND Within 92 days after opening the valve” to “In accordance with the Containment Leakage Rate Testing Program.” The Model Safety Evaluation for TSTF-425 (74 FR 31996) does not recognize the application of the Surveillance Frequency Control Program (SFCP) to Frequencies that reference other approved programs for the specific interval (such as the Containment Leakage Rate Testing Program). Therefore, the previously proposed change to control the SR 3.6.3.5 Frequency under the SFCP is being rescinded, with corresponding changes being made.

- Attachment 1 – Page 2 of 4 is revised
- Attachment 3.1 – Page 3.6-13 is replaced
- Attachment 3.2 – Page 3.6-13 is replaced
- Attachment 4.1 – Page 3.6-13 is replaced
- Attachment 4.2 – Page 3.6-13 is replaced
- Attachment 5 – Page B 3.6-25 is replaced
- Attachment 7 – Page 15 of 37 is revised

Additional miscellaneous changes are being made:

- Removed an additional reference to the deletion of the “Staggered Test Basis” definition in Attachment 1 (Page 3 of 4). That change was rescinded in Tennessee Valley Authority Letter CNL-19-054 (ML19157A302).
- An errant page related to WBN Unit 2 was deleted from the Attachment 3.1 WBN Unit 1 TS markup (Page 3.3-12) and replaced with the correct Unit 1 page.
- Attachment 5 Bases page B 3.8-16 was revised to remove the reference to a 184-day Frequency for SR 3.8.1.7. The TSTF-425 LAR proposes to control the SR 3.8.1.7 Frequency under the SFCP.

Note: The above changes are provided in the following pages in the order that they appear in the TSTF-425 LAR. General page instructions are provided in **green** font. Specific changes on each page are provided in **red** font.

Surveillance Requirements versus the WBN Surveillance Requirements is provided in Attachment 7. Attachment 7 provides individual dispositions of each STS and WBN change. Where the changes are identical, a disposition of "No variation" is provided. Similarly, differences due to bracketed information in TSTF-425 compared with unbracketed WBN site-specific information (such as the relocation of the Staggered Test Basis definition to licensee control) is not a variation. Where a variation is taken, the disposition provides a cross-reference to the paragraph in this Attachment that provides justification.

2.2.1 Administrative Variations

The following variations taken from the TSTF-425 template for NUREG-1431 are considered to be administrative in nature. A cross-reference of the TSTF-425 Surveillance Requirements versus the WBN Surveillance Requirements is included in Attachment 7.

2.2.1.1 WBN Surveillance Requirements (SRs) with Surveillance numbers that differ from the corresponding Westinghouse Standard Technical Specifications (NUREG-1431) Surveillances, have wording that is slightly different, and have differing existing Frequencies with a similar testing intent are administrative variations from TSTF-425 with no effect on the NRC staff's model safety evaluation dated July 6, 2009 (74 FR 31996). Attachment 7 itemizes these variations.

2.2.1.2 For NUREG-1431 surveillances that are not contained in the WBN TS, the corresponding NUREG-1431 mark-ups included in TSTF-425 for these Surveillances are not applicable to WBN. These are administrative variations from TSTF-425 with no effect on the NRC staff's model safety evaluation dated July 6, 2009 (74 FR 31996).

2.2.1.3 Various TSTF-425 Section 3.3 instrumentation surveillances are invoked by Instrumentation Functions contained in tables. The analogous WBN surveillances may have different SR numbers, slightly different wording, and may be invoked by a different set of Functions. These are administrative variations from TSTF-425 with no effect on the NRC staff's model safety evaluation dated July 6, 2009 (74 FR 31996).

2.2.1.4 Various WBN Unit 1 surveillances include one-time, historical requirements not depicted on the TSTF-425 markup. While these are not being removed from the WBN Unit 1 TS, they are nonetheless considered to be administrative variations from TSTF-425 with no effect on the NRC staff's model safety evaluation dated July 6, 2009 (74 FR 31996).

2.2.1.5 Various WBN plant-specific Surveillances with fixed periodic Frequencies are not contained in NUREG-1431, and therefore, are not included in the NUREG-1431 mark-ups provided in TSTF-425. TVA has assessed these SRs and determined that the relocation of the Frequencies for these SRs is consistent with TSTF-425, Revision 3, and with the NRC staff's model safety evaluation dated July 6, 2009 (74 FR 31996), based on the scope exclusions identified in Section 1.0, "Introduction," of the model safety evaluation. In accordance with TSTF-425, changes to the Frequencies for these Surveillances would be controlled under the SFCP.

2.2.1.6 The TS Bases insert provided in TSTF-425 to replace text describing the basis for each frequency relocated to the SFCP has been revised from "The Surveillance

(including where a WBN SR Frequency is ineligible for control under the SFCP)

Revise this page
from Attachment 1

Frequency is based on operating experience, equipment reliability, and plant risk and is controlled under the Surveillance Frequency Control Program" to read "The Surveillance Frequency is controlled under the Surveillance Frequency Control Program." This variation is consistent with NUREG-1431, Revision 4, with the NRC letter dated April 14, 2010 (ML100990099), and with the NRC-supported changes to the letter in a subsequent discussion with the TSTF.

2.2.1.7 Various formatting changes were made, such as revising the footers of various pages in the TS markups to promote consistency, inserting new pages due to text rollover, and punctuation corrections on affected SRs. These are administrative changes not depicted in TSTF-425.

2.2.2 Technical Changes

2.2.2.1 WBN SR 3.7.5.2 performs a verification that the developed head of each Auxiliary Feedwater pump at the flow test point is greater than or equal to the required developed head, and has an existing Frequency of 31 days on a Staggered Test Basis. This is being changed to a Frequency of "In accordance with the Inservice Testing Program."

Justification: WBN SR 3.7.5.2 correlates to NUREG-1431 SR 3.7.5.2; however, the STS Frequency is controlled in accordance with the Inservice Testing Program. That change was made to the STS with TSTF-101, as approved by the NRC in a letter dated September 27, 1996 (which preceded TSTF-425). ~~TSTF-425 relocates the definition of Staggered Test Basis to a licensee controlled document, which would result in that term being undefined in the WBN SR 3.7.5.2 Frequency.~~ Therefore, TVA is changing this Frequency to "In accordance with the Inservice Testing Program" to be consistent with NUREG-1431 Revision 4. Moreover, since this test is required as part of the WBN Inservice Testing Program, the SR Frequency reference to that program is most appropriate.

This is another reference to
"Staggered Test Basis" that is being
rescinded under CNL-19-054

2.3 Bases Changes

Revised TS Bases are provided in Attachment 5 for NRC information. Only the WBN Unit 1 TS Bases markups are provided, as the WBN Unit 2 changes are nearly identical in terms of the TSTF-425-driven changes being made. These Bases revisions will be incorporated as an implementing action pursuant to TS 5.6, Technical Specifications (TS) Bases Control Program, following issuance of the amendment. The TS Bases for pages provided in Attachment 5 are typically revised by replacing frequency explanations with the statement, "The Surveillance Frequency is controlled under the Surveillance Frequency Control Program."

3.0 REGULATORY ANALYSIS

3.1 Applicable Regulatory Requirements and Criteria

A description of the proposed changes and their relationship to applicable regulatory Requirements is provided in TSTF-425, Revision 3 (ML090850642) and the NRC staff's Model Safety Evaluation published in the Notice of Availability dated July 6, 2009 (74 FR 31996). TVA has concluded that the relationship of the proposed

Delete this page
from Attachment 3.1

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.3.1.7 -----NOTE----- For Functions 2 and 3 (Power Range Instrumentation), this Surveillance shall include verification that interlock P-10 is in the required state for existing unit conditions. ----- Perform COT.</p>	<p style="text-align: center;">184 days</p>
<p>SR 3.3.1.8 -----NOTES----- 1. Not required to be performed for Source Range instrumentation prior to entering MODE 3 from MODE 2 until 4 hours after entry into MODE 3. 2. This Surveillance shall include verification that interlock P-6 is in the required state for existing unit conditions. ----- Perform COT.</p>	<p style="text-align: center;">-----NOTE----- Only required when not performed within previous 31 days -----</p> <p>Prior to reactor startup <u>AND</u> Four hours after reducing power below P-10 for intermediate range instrumentation <u>AND</u> Four hours after reducing power below P-6 for source range instrumentation <u>AND</u> Every 31 days thereafter</p>

Insert 1

the frequency specified in the Surveillance Frequency Control Program

This page inadvertently appeared in the final electronic file in Attachment 3.1 and over-ride the Unit 1 page. The correct page for Unit 2 is found in Attachment 3.2.

(continued)

Add this page to Attachment 3.1

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.3.1.7</p> <p style="text-align: center;">-----NOTE-----</p> <p>For Functions 2 and 3 (Power Range Instrumentation), this Surveillance shall include verification that interlock P-10 is in the required state for existing unit conditions.</p> <p style="text-align: center;">-----</p> <p>Perform COT.</p>	<p style="text-align: center;">-----NOTE-----</p> <p style="text-align: center;">184 days</p>
<p>SR 3.3.1.8</p> <p style="text-align: center;">-----NOTES-----</p> <ol style="list-style-type: none"> Not required to be performed for Source Range instrumentation prior to entering MODE 3 from MODE 2 until 4 hours after entry into MODE 3. This Surveillance shall include verification that interlock P-6 is in the required state for existing unit conditions. <p style="text-align: center;">-----</p> <p>Perform COT.</p>	<p style="text-align: center;">-----NOTE-----</p> <p>Only required when not performed within previous 31 days</p> <p style="text-align: center;">-----</p> <p>Prior to reactor startup</p> <p><u>AND</u></p> <p>Four hours after reducing power below P-10 for intermediate range instrumentation</p> <p><u>AND</u></p> <p>Four hours after reducing power below P-6 for source range instrumentation</p> <p><u>AND</u></p> <p>Every 31 days thereafter</p>

the frequency specified in the Surveillance Frequency Control Program

Insert 1

(continued)

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from Attachment 3.1

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.6.3.4	Verify the isolation time of each power operated and each automatic containment isolation valve is within limits.	In accordance with the Inservice Testing Program or 92 days
SR 3.6.3.5	Perform leakage rate testing for containment purge valves with resilient seals.	In accordance with the Containment Leakage Rate Testing Program
SR 3.6.3.6	Verify each automatic containment isolation valve that is not locked, sealed, or otherwise secured in position, actuates to the isolation position on an actual or simulated actuation signal.	18 months
SR 3.6.3.7	Verify each 24 inch containment lower compartment purge supply and exhaust isolation valve is blocked to restrict the valve from opening > 50°.	18 months

Insert 1

(continued)

This change is made to reflect the page issued with Amendment 123. The SR 3.6.3.5 Frequency is no longer eligible for relocation to the SFCP.

Replace this page from Attachment 3.2

Containment Isolation Valves
3.6.3

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.6.3.5	Perform leakage rate testing for containment purge valves with resilient seals.	In accordance with the Containment Leakage Rate Testing Program
SR 3.6.3.6	Verify each automatic containment isolation valve that is not locked, sealed, or otherwise secured in position, actuates to the isolation position on an actual or simulated actuation signal.	18 months
SR 3.6.3.7	Verify each 24 inch containment lower compartment purge supply and exhaust isolation valve is blocked to restrict the valve from opening > 50°.	18 months
SR 3.6.3.8	Verify the combined leakage rate for all shield building bypass leakage paths is $\leq 0.25 L_a$ when pressurized to ≥ 15.0 psig.	In accordance with the Containment Leakage Rate Testing Program

Insert 1

This change is made to reflect the page issued with Amendment 24. The SR 3.6.3.5 Frequency is no longer eligible for relocation to the SFCP.

Replace this page
from Attachment 4.1

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.6.3.4	Verify the isolation time of each power operated and each automatic containment isolation valve is within limits.	In accordance with the Inservice Testing Program or in accordance with the Surveillance Frequency Control Program
SR 3.6.3.5	Perform leakage rate testing for containment purge valves with resilient seals.	In accordance with the Containment Leakage Rate Testing Program
SR 3.6.3.6	Verify each automatic containment isolation valve that is not locked, sealed, or otherwise secured in position, actuates to the isolation position on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program
SR 3.6.3.7	Verify each 24 inch containment lower compartment purge supply and exhaust isolation valve is blocked to restrict the valve from opening > 50°.	In accordance with the Surveillance Frequency Control Program

(continued)

This change is made to reflect the page issued with Amendment 123. The SR 3.6.3.5 Frequency is no longer eligible for relocation to the SFCP.

Replace this page
from Attachment 4.2

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.6.3.5	Perform leakage rate testing for containment purge valves with resilient seals.	In accordance with the Containment Leakage Rate Testing Program
SR 3.6.3.6	Verify each automatic containment isolation valve that is not locked, sealed, or otherwise secured in position, actuates to the isolation position on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program
SR 3.6.3.7	Verify each 24 inch containment lower compartment purge supply and exhaust isolation valve is blocked to restrict the valve from opening > 50°.	In accordance with the Surveillance Frequency Control Program
SR 3.6.3.8	Verify the combined leakage rate for all shield building bypass leakage paths is $\leq 0.25 L_a$ when pressurized to ≥ 15.0 psig.	In accordance with the Containment Leakage Rate Testing Program

This change is made to reflect the page issued with Amendment 24. The SR 3.6.3.5 Frequency is no longer eligible for relocation to the SFCP.

Replace this page
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BASES

SURVEILLANCE
REQUIREMENTS

SR 3.6.3.4 (continued)

isolation time and Frequency of this SR are in accordance with the Inservice Testing Program or ~~92 days in accordance with the Surveillance Frequency Control Program.~~

SR 3.6.3.5

For containment purge valves with resilient seals, additional leakage rate testing beyond the test requirements of 10 CFR 50, Appendix J, Option B (Ref. 4), is required to ensure OPERABILITY.

Operating experience has demonstrated that this type of seal has the potential to degrade in a shorter time period than do other seal types. Based on this observation and the importance of maintaining this penetration leak tight (due to the direct path between containment and the environment), these valves will not be placed on the maximum extended test interval. Therefore, these valves will be tested in accordance with Regulatory Guide 1.163, which allows a maximum test interval of 30 months. (Ref.3).

SR 3.6.3.6

Automatic containment isolation valves close on a containment isolation signal to prevent leakage of radioactive material from containment following a DBA. This SR ensures that each automatic containment isolation valve will actuate to its isolation position on a containment isolation signal. This Surveillance is not required for valves that are locked, sealed, or otherwise secured in the required position under administrative control. ~~The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power.~~

This change is made to reflect
Amendment 123. The SR 3.6.3.5
Frequency is no longer eligible for
relocation to the SFCP.

(continued)

Add this page to
Attachment 5

BASES

SURVEILLANCE
REQUIREMENTS
(continued)

SR 3.8.1.2 and SR 3.8.1.7

These SRs help to ensure the availability of the standby electrical power supply to mitigate DBAs and transients and to maintain the plant in a safe shutdown condition.

For the purposes of SR 3.8.1.2 and SR 3.8.1.7 testing, the DGs are started from standby conditions. The DG engines for WBN have an oil circulation and soakback system that operates continuously to preclude the need for a prelube and warmup when a DG is started from standby. Standby conditions for a DG mean that the diesel engine coolant and oil are being continuously circulated and temperature is being maintained consistent with manufacturer recommendations.

In order to reduce stress and wear on diesel engines, the manufacturer recommends a modified start in which the starting speed of DGs is limited, warmup is limited to this lower speed, and the DGs are gradually accelerated to synchronous speed prior to loading. These start procedures are the intent of Note 2, which is only applicable when such modified start procedures are recommended by the manufacturer.

SR 3.8.1.7 requires that, ~~at a 184 day Frequency~~, the DG starts from an actual or simulated loss of offsite power signal and achieves required voltage and frequency within 10 seconds. The 10 second start requirement supports the assumptions of the design basis LOCA analysis in the FSAR, Section 15 (Ref. 5). Starting the DG from an emergency start signal ensures the automatic start relays are cycled (deenergized) on a 184 day Frequency.

The 10 second start requirement is not applicable to SR 3.8.1.2 (see Note 2) when a modified start procedure as described above is used. During this testing, the diesel is not in an accident mode and the frequency is controlled by the operator instead of the governor's accident speed reference. If a modified start is not used, the 10 second start requirement of SR 3.8.1.7 applies. Stable operation at the nominal voltage and frequency values is also essential to establishing DG OPERABILITY, but a time constraint is not imposed. This is because a typical DG will experience a period of voltage and frequency oscillations prior to reaching steady state operation if these oscillations are not dampened out by load application. This period may extend beyond the 10 second acceptance criteria and could be a cause for failing the SR. In lieu of a time constraint in the SR, WBN will monitor and trend the actual time to reach steady state operation as a means of ensuring there is no voltage regulator or governor degradation which could cause a DG to become inoperable.

Since SR 3.8.1.7 requires a 10 second start, it is more restrictive than SR 3.8.1.2, and it may be performed in lieu of SR 3.8.1.2. This is the intent of Note 1 of SR 3.8.1.2.

(continued)

This is an additional TS Bases
change affected by adoption of the
SFCP

Revise this page
from Attachment 7

TSTF-425 Section/ SR No.	NUREG-1431 Technical Specification Section Title/Surveillance Description	WBN Section/ SR No.	WBN Technical Specification Section Title/Surveillance Description	Disposition and Attachment 1 Reference
3.6.3.5	Verify the isolation time of each automatic power operated containment isolation valve is within limits.	3.6.3.4	Verify the isolation time of each power operated and each automatic containment isolation valve is within limits.	Administrative Variation - Section 2.2.1.1
3.6.3.6	Cycle each weight or spring loaded check valve testable during operation through one complete cycle of full travel, and verify each check valve remains closed when the differential pressure in the direction of flow is \leq [1.2] psid and opens when the differential pressure in the direction of flow is \geq [1.2] psid and $<$ [5.0] psid.	N/A	N/A Administrative Variation - Section 2.2.1.2. This SR is ineligible for change due to WBN 1/2 License Amendment 123/24.	Administrative Variation - Section 2.2.1.2
3.6.3.7	Perform leakage rate testing for containment purge valves with resilient seals.	3.6.3.5	Perform leakage rate testing for containment purge valves with resilient seals.	Administrative Variation - Section 2.2.1.1
3.6.3.8	Verify each automatic containment isolation valve that is not locked, sealed or otherwise secured in position, actuates to the isolation position on an actual or simulated actuation signal.	3.6.3.6	Verify each automatic containment isolation valve that is not locked, sealed, or otherwise secured in position, actuates to the isolation position on an actual or simulated actuation signal.	Administrative Variation - Section 2.2.1.1
3.6.3.9	Cycle each weight or spring loaded check valve not testable during operation through one complete cycle of full travel, and verify each check valve remains closed when the differential pressure in the direction of flow is \leq [1.2] psid and opens when the differential pressure in the direction of flow is \geq [1.2] psid and $<$ [5.0] psid.	N/A	N/A	Administrative Variation - Section 2.2.1.2
3.6.3.10	Verify each [] inch containment purge valve is blocked to restrict the valve from opening $>$ [50] %.	3.6.3.7	Verify each 24 inch containment lower compartment purge supply and exhaust isolation valve is blocked to restrict the valve from opening $>$ 50°.	Administrative Variation - Section 2.2.1.1
3.6.4A	Containment Pressure (Atmospheric, Dual, and Ice Condenser)	3.6.4	Containment Pressure	
3.6.4A.1	Verify containment pressure is within limits.	3.6.4.1	Verify containment pressure is within limits.	Administrative Variation - Section 2.2.1.1

This change is made to
reflect Amendment 123/24