

TECHNICAL SPECIFICATION CHANGE REQUEST NO. 57 (APPENDIX A)

Replace pages 3/4 6-15, 3/4 6-17, 3/4 6-18, 3/4 6-19, 3/4 6-20 and 3/4 6-21 with the attached revised pages 3/4 6-15, 3/4 6-17, 3/4 6-18, 3/4 6-19, 3/4 6-20, and 3/4 6-21.

Proposed Change

- A. For ACTION statements b and c of Specification 3.6.3, add a footnote 1 to read: "These valves may be reopened on an intermittent basis under administrative control for up to 4 hours in any 24-hour period as necessary for sampling or surveillance testing."
- B. Add ACTION statement e to read: "The provisions of Specification 3.0.4 are not applicable to those valves in Table 3.6-1 annotated by double asterisks (**)." Double asterisks have been added to appropriate valves in Table 3.6-1.
- C. Add asterisk note to Table 3.6-1 to read: "May be opened on an intermittent basis under administrative control." Asterisks have been added to appropriate valves in Table 3.6-1.

Reason for the Proposed Change

- A. ACTION statements b and c of Specification 3.6.3.1 require penetrations with one or more inoperable isolation valves(s) to be isolated. However, other specifications require cycling of the valves used to complete the isolation for either surveillance testing or to draw samples to complete required analyses. It is for this reason that the footnote has been proposed.
- B. ACTION e has been proposed for Specification 3.6.3.1 for valves that, if they are inoperable and ACTION Statement b or c is in effect, are in their post-containment isolation configuration. Since these valves are already in their post-containment isolation configuration they neither perform an emergency core cooling function, nor offer any hindrance to normal plant operations while shut or isolated. There is no reason to restrain the entry into other OPERATIONAL MODES. Therefore, the exception to the provisions of Specification 3.0.4 is proposed.
- C. The table note is being proposed to Table 3.6-1 because there are times in MODES 1, 2, 3 and 4 that it is necessary to cycle these manual valves to perform surveillance, draw samples, or support entry into the containment. Additionally, this note is currently included in B&W Standard (NUREG-0103, Rev. 3).

Safety Analysis of the Proposed Change

- A. The footnote to ACTION statement b and c will allow the intermittent operation of the isolated valves for sampling or surveillance testing purposes under administrative control. This sampling and surveillance

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Safety Analysis of Proposed Change (Continued)

testing is necessary to ensure the continued safe operation of Crystal River - Unit 3. To prevent these activities would cause the unit to shutdown due to the failure to fulfill the other specifications. This is not a reasonable course of action because the sampling and surveillance testing can be completed under administrative control. This administrative control is sufficient to re-isolate these valves upon receipt of a containment isolation signal.

- B. Entry into an OPERATIONAL MODE is restricted in that the conditions of the Limiting Conditions for Operation (LCO) must be met without reliance on ACTION statements unless specifically excepted. Specific exceptions can be granted when the ACTION statement places the unit in a condition which is equivalent to meeting the LCO. In this case, ACTION statement b or c will place the valves in their post-containment isolation positions. Therefore, the entry into other OPERATIONAL MODES should not be prohibited because the valves will be in their isolation positions and would not contribute to an accident if containment isolation was required.
- C. Intermittent operation of manual isolation valves under administrative control in MODES 1, 2, 3 and 4 is acceptable. The administrative control is sufficient to re-isolate these valves upon the receipt of a containment isolation signal.

CONTAINMENT SYSTEMS

3/4.6.3 CONTAINMENT ISOLATION VALVES

LIMITING CONDITION FOR OPERATION

3.6.3.1 The containment isolation valves specified in Table 3.6-1 shall be OPERABLE with isolation times as shown in Table 3.6-1.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With one or more of the isolation valve(s) specified in Table 3.6-1 inoperable, either:

- a. Restore the inoperable valve(s) to OPERABLE status within 4 hours, or
- b. Isolate each affected penetration within 4 hours by use of at least one deactivated automatic valve secured in the isolation position,^{1/} or
- c. Isolate each affected penetration within 4 hours by use of at least one closed manual valve or blind flange,^{1/} or
- d. Be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- e. The provisions of Specification 3.0.4 are not applicable to those valves in Table 3.6-1 annotated by double asterisks (**).

SURVEILLANCE REQUIREMENTS

4.6.3.1.1 The isolation valves specified in Table 3.6-1 shall be demonstrated OPERABLE prior to returning the valve to service after maintenance, repair or replacement work is performed on the valve or its associated actuator, control or power circuit by performance of a cycling test and verification of isolation time.

^{1/} These valves may be re-opened on an intermittent basis under administrative control for up to 4 hours in any 24 hour period as necessary for sampling or surveillance testing.

TABLE 3.6-1 (Continued)

CONTAINMENT ISOLATION VALVES

<u>VALVE NUMBER</u>	<u>FUNCTION</u>	<u>ISOLATION TIME</u> (seconds)
A. CONTAINMENT ISOLATION		
1.	BSV-27 check # BSV-3 # BSV-26 check # BSV-4 #	iso. dur. nor. operation and open dur. RB spray NA 60 NA 60
2.	CAV-126** CAV-1** CAV-3** CAV-2** CAV-4 #** CAV-6 #** CAV-5 #** CAV-7 #**	iso. CA sys. fr. RC letdn. iso. CA sys. fr. pzs. 60 60 60 iso. CA sys. 60 isolate liquid sampling system 60 60 60 60
3.	CFV-20 check CFV-28** CFV-17 check CFV-27** CFV-18 check CFV-26** CFV-19 check CFV-25** CFV-42** CFV-15** CFV-16** CFV-29** CFV-11** CFV-12**	iso. N ₂ supply fr. CFT-1A NA 60 iso. N ₂ supply fr. CFT-1B NA 60 iso. MU system fr. CFT-1B NA 60 isol MU system fr. CFT-1A NA 60 iso. liquid sampling fr. CF system 60 iso. WD sys. fr. CF tanks 60 60 60 iso. CF tanks fr. liquid sampling system 60 60
4.	CIV-41** CIV-40** CIV-34** CIV-35**	iso. CI sys. fr. RB 60 60 60 60

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TABLE 3.6-1 (Continued)

CONTAINMENT ISOLATION VALVES

<u>VALVE NUMBER</u>	<u>FUNCTION</u>	<u>ISOLATION TIME</u> (seconds)
5.	DHV-93 check DHV-91	iso. DH system fr. pzd. NA 60
	DHV-43 # DHV-42 #	iso. DH sys. fr. RB sump 120 120
	DHV-4# & 41#	iso. DH sys. Fr. RC 120
	DHV-6 # DHV-5 #	iso. DH system from Reactor Vessel 60 60
6.	DWV-162 check DWV-160	iso. system NA 60
7.	FWV-44 check # FWV-45 check #	iso. feedwater from RCSG-1A NA NA
	FWV-43 check # FWV-45 check #	iso. feedwater from RCSG-1B NA NA
8.	MSV-130 #** MSV-148 #** MSV-411 # MSV-412 # MSV-413 # MSV-414 #	from RCSG-1A from RCSG-1B iso. main steam lines from RCSG-1A iso. main steam lines from RCSG-1A iso. main steam lines from RCSG-1B iso. main steam lines from RCSG-1B 60 60 60 60 60 60
9.	MUV-40** MUV-41** MUV-49 MUV-253 MUV-261 MUV-260 MUV-259 MUV-258	iso. MU system from RC 60 60 60 60 iso. MU system from control bleed-off 60 60 60 60

TABLE 3.6-1 (Continued)
CONTAINMENT ISOLATION VALVES

<u>VALVE NUMBER</u>	<u>FUNCTION</u>	<u>ISOLATION TIME</u> (seconds)
9. (Continued)		
MUV-163 check #	open during HPI and	NA
MUV-25 #	iso. dur. nor. operation	60
MUV-164 check #		NA
MUV-26 #		60
MUV-160 check #	open during HPI and	NA
MUV-23 #	iso. dur. nor. operation	60
MUV-161 check #	open during HPI and	NA
MUV-24 #	iso. dur. nor. operation	60
MUV-27 #	open dur. nor. operation and closed during RB Isolation	60
10.		
SWV-39 #	iso. NSCCC from AHF-1C	60
SWV-45 #		60
SWV-35 #	iso. NSCCC from AHF-1A	60
SWV-41 #		60
SWV-37 #	iso. NSCCC from AHF-1B	60
SWV-43 #		60
SWV-48 #**	to isolate NSCCC from	60
SWV-47 #**	MUHE-1A & 1B and WDT-5	60
SWV-49 #**		60
SWV-50 #**		60
SWV-80 #	iso. NSCCC from RCP-1A	60
SWV-84 #		60
SWV-82 #	iso. NSCCC from RCP-1C	60
SWV-86 #		60
SWV-81 #	iso. NSCCC from RCP-1D	60
SWV-85 #		60
SWV-79 #	iso. NSCCC from RCP-1B	60
SWV-83 #		60
SWV-109#	NSCCC to DRRD-1	60
SWV-110#		60

TABLE 3.6-1 (Continued)
CONTAINMENT ISOLATION VALVES

<u>VALVE NUMBER</u>	<u>FUNCTION</u>	<u>ISOLATION TIME</u> (seconds)
10.	WDV-4** WDV-3**	iso. WDT-4 from RB sump 60 60
	WDV-60** & 61** WDV-94** & 62**	iso. WDT-4 from WDT-5 iso. WDT-4 from WDP-8 60 60
	WDV-406** WDV-405**	iso. gas waste disposal from vents in RC system 60 60
12.	WSV-3 WSV-4 WSV-5 WSV-6	iso. containment monitoring system from RB 60 60 60 60
B. CONTAINMENT PURGE AND EXHAUST		
1.	AHV-1C & 1D AHV-1B & 1A	iso. pur. sup. system iso. pur. exhaust system 60 60
C. MANUAL		
1.	IAV-28* IAV-29*	iso. IA from RB NA NA
2.	LRV-50 LRV-36	iso. leak rate test system from RB NA NA
	LRV-51 LRV-35 & 47	iso. atmos. vent and RB purge exhaust system from RB NA NA
	LRV-49 LRV-38 & 52	iso. atmos. vent from RB NA NA
	LRV-45 LRV-44	iso. LR test panel from RB NA NA
3.	MSV-146#	iso. NG system from tank from RCSG-1B NA
4.	NGV-62* NGV-82 #*	iso. NG system from steam generators NA NA
	NGV-82*	iso. NG system from pwr. NA

TABLE 3.6-1 (Continued)
CONTAINMENT ISOLATION VALVES

<u>VALVE NUMBER</u>	<u>FUNCTION</u>	<u>ISOLATION TIME</u> (seconds)
5. SAV-24*	iso. SA from RB	NA
6. SFV-18 SFV-19	iso. SF system	NA NA
SFV-119 # SFV-120 #	iso. Fuel Transfer tubes from F.T. Canal	NA NA
7. WSV-1* WSV-2*	containment monitoring system from RB	NA NA

D. PENETRATIONS REQUIRING TYPE B TESTS

Blind Flange 119	iso. RB	NA
Blind Flange 120		NA
Blind Flange 116		NA
Blind Flange 202		NA
Blind Flange 348	iso. fuel transfer tube from	NA
Blind Flange 436	Transfer Canal	NA
Equipment Hatch	iso. RB	NA
Personnel Hatch	iso. RB	NA

Not subject to Type C Leakage Test

* May be opened on an intermittent basis under administrative control

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