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, 3/4 6-21, and 3/4 6-21a 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, 3/4 6-21, and 3/4 6-21a.

Proposed Change

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 asterisks." Asterisks have been added to appropriate valves in Table 3.6-1.

Reason for Proposed Change

ACTION "e" has been proposed for Specification 3.6.3.1 for valves that are performing their post-containment isolation function, but are inoperable and ACTION Statement "b" or "c" is in effect. 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.

Safety Analysis of the Proposed Action

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 ensure the valves perform their post-containment isolation function. Therefore, the entry into other OPERATIONAL MODES should not be prohibited because the valves will be performing their isolation function and would not contribute to an accident if containment isolation was required.