

### 3.0 LIMITING CONDITIONS FOR OPERATION (continued)

#### 3.4 Confinement

##### 3.4.1 Applicability

This specification applies to the operations that require confinement and to the equipment needed to achieve confinement.

##### 3.4.2 Objective

To ensure that the confinement boundary can be secured when needed.

##### 3.4.3 Specifications

- A. The reactor confinement boundary shall be operable whenever the reactor is operating.
- B. The reactor confinement boundary shall be secured during fuel transfer operations.

##### 3.4.4 Bases

Specification A is based on the assumption that the doors and windows located in the building walls that define the confinement boundary may need to be secured due to the accidental release of radioactive material generated during reactor operation.

Specification B is based on the hypothetical accident (SAR: 6.4) that occurs during movement of a fuel assembly and the importance of having the confinement boundary secured prior to the fuel transfer operation.

## CHANGES TO DEFINITIONS SECTION OF TECHNICAL SPECIFICATIONS

### Changes to Technical Specification Definitions:

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Add a new definition for **CONFINEMENT SECURED** following the existing definition for **CONFINEMENT BOUNDRY** and prior to the existing definition for **CONTROL ROD**.

#### Reason for the Change:

The addition of a definition for **CONFINEMENT SECURED** is necessary to clarify Technical Specification 3.4.3.B on page 3-10. Technical Specification 3.4.3.B states, "The reactor confinement boundary shall be secured during fuel transfer operations." This introduces a degree of ambiguity as to the permissibility of personnel passing through the confinement boundary during periods of fuel transfer operations. In other words, is the confinement boundary secured while personnel are passing through doors in the confinement boundary? The inclusion of the definition as written would eliminate the ambiguity concerning the permitted passage of personnel through the confinement boundary during fuel transfer operations.

In both subparts "a" and "b" of the definition of **CONFINEMENT SECURED**, the requirement exists that the confinement boundary door or window is required to be closed or attended by a person with the ability to close the door or window in the event of an emergency. Personnel passing through the confinement boundary shall be considered the attending person as long as that person has the physical and mental ability to close the door or window if necessary. Signs will be posted on all doors and windows that can be opened and are part of the confinement boundary to inform personnel passing through such doors or opening windows of the requirement for confinement during fuel transfer operations.

#### Safety Implications:

Specification 3.4.3.B is based on the hypothetical accident (SAR 6.4) that occurs during movement of a fuel assembly and the importance of having the boundary secured prior to the fuel transfer operation. In such an event, the immediate action of the SRO on duty is to initiate a building evacuation which requires the use of many of the doors in the confinement boundary. It is for this reason that no reduction in safety results from the inclusion of the new definition.