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Proposed Changes to the Current Technical Specifications

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REACTOR COOLANT SYSTEM

3/4.4.3 REACTOR COOLANT SYSTEM LEAKAGE

LEAKAGE DETECTION SYSTEMS

LIMITING CONDITION FOR OPERATION

3.4.3.1 The following reactor coolant system leakage detection systems shall be OPERABLE:

- a. The drywell atmosphere particulate radioactivity monitoring system,
- b. The drywell sump flow monitoring system, and
- c. Either the drywell atmosphere gaseous radioactivity monitoring system or the drywell air coolers condensate flow rate monitoring system.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

ACTION:

With only two of the above required leakage detection systems OPERABLE,

- a. operation may continue for up to 30 days when the drywell atmosphere particulate radioactivity monitoring system is inoperable provided grab samples of the drywell atmosphere are obtained and analyzed at least once per 24 hours.
- b. operations may continue:
 - with the drywell equipment drain sump flow monitoring subsystem inoperable provided the drywell equipment drain sump flow rate is monitored and determined by alternate means at least once per 12 hours.
 - 2. for up to 30 days with the drywell floor drain sump flow monitoring subsystem inoperable provided the drywell floor drain sump flow rate is monitored and determined by alternate means at least once per 8 hours,
- c. operation may continue for up to 30 days when the drywell atmosphere gaseous radioactivity monitoring system and the drywell air coolers condensate flow rate monitoring system are inoperable provided grab samples of the drywell atmosphere are obtained and analyzed at least once per 24 hours.

Otherwise, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

* In lieu of the requirement for the associated V-notched weir box to be OPERABLE, the drywell floor drain sump flow monitoring subsystem may be considered OPERABLE provided the drywell floor drain sump flow is monitored and determined by alternate means at least once per 8 hours. This provision is applicable until the first time the reactor is brought to COLD SHUTDOWN after march 15, 1994.

11

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Proposed Changes to Improved Technical Specification Conversion Submittal (IP Letter U-602196)

monitoring system

30 days

- 3.4 REACTOR COOLANT SYSTEM (RCS)
- 3.4.7 RCS Leakage Detection Instrumentation
- LCO 3.4.7 The following RCS leakage detection instrumentation shall be OPERABLE:
 - Drywell floor drain sump monitoring system; [and] C
 One channel of either drywell atmospheric particulate or atmospheric gaseous monitoring system; [and B]

Restore drywell floor |

drain sump monitoring system to OPERABLE

c. Drywell air cooler condensate flow rate monitoring system

MODES 1, 2, and 3.

ACTIONS

APPLICABILITY:

Insert 14

drywell

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Drywell floor drain sump monitoring system inoperable.	LCO 3.0.4 is not applicable.	

status.

A.1

(continued)

Insert 14	
***********	NOTE
drywell floor drain sump i	for the associated V-notched weir box to be OPERABLE, the monitoring system may be considered OPERABLE provided the flow is monitored and determined by alternate means at least rovision is applicable until the first time the reactor is brought to 1994.

BASES

APPLICABLE SAFETY ANALYSES (continued) Therefore, these actions provide adequate response before a significant break in the RCPB can occur.

RCS leakage detection instrumentation satisfies Criterion 1 of the NRC Policy Statement.

LCO

Insert B33

t f

The drywell floor drain sump monitoring system is required to quantify the unidentified LEAKAGE from the RCS. Thus, for the system to be considered OPERABLE, wither the flow monitoring continuous level monitoring portion of the system must be OPERABLE. The other monitoring systems provide early alarms to the operators so closer examination of other detection systems will be made to determine the extent of any corrective action that may be required. With the leakage detection systems inoperable, monitoring for LEAKAGE in the RCPB is degraded.

APPLICABILITY

In MODES 1, 2, and 3, leakage detection systems are required to be OPERABLE to support LCO 3.4.5. This Applicability is consistent with that for LCO 3.4.5.

ACTIONS

A.1

With the drywell floor drain sump monitoring system inoperable, no other form of sampling can provide the equivalent information to quantify leakage. However, the drywell atmospheric activity monitors and the drywell air cooler condensate flow rate monitors will provide indications of changes in leakage.

PG2

With the drywell floor drain sump monitoring system inoperable, but with RCS unidentified and total LEAKAGE being determined every bhours (SR 3.4.5.1), operation may continue for 30 days. The 30 day Completion Time of Required Action A.1 is acceptable, based on operating experience, considering the multiple forms of leakage detection that are still available. Required Action A.1 is modified by a Note that states that the provisions of LCO 3.0.4 are not applicable. As a result, a MODE change is allowed when the drywell floor drain sump monitoring system

(continued)

SUMP INTET

Insert B33

The LCO is modified by a Note that identifies that the V-notch sump inlet flow monitoring system is not required to be OPERABLE provided the drywell floor drain sump flow is monitored and determined at least once per 8 hours. This Note only applies until the first shutdown to MODE 4 after March 15, 1994. Prior to plant restart from that plant shutdown, the V-notch sump inlet flow monitoring system must be restored to OPERABLE status.

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DISCUSSION OF CHANGES TO NUREG-1434
TS 3.4.7 - RCS LEAKAGE DETECTION INSTRUMENTATION

BRACKETED ADMINISTRATIVE CHOICE

B.1 Brackets removed and optional wording preferences revised to reflect appropriate plant specific requirements.

PLANT SPECIFIC DIFFERENCE

- P.1 The safety analysis report for this station is identified as the Updated Safety Analysis Report and is correctly referred to as the USAR.
- P.2 The Bases discussion is revised to reflect the choice of applicable bracketed information in the Action.
- P.3 Additional information is included in the references for ease of identification. This additional information may include the title, revision number and/or date.
- P.4 The LCO and Bases are revised to be consistent with the plant specific design.
- P.5 This comment number is not used for this station.
- P.6 The Bases description of ACTION A.1 includes the frequency of SR 3.4.5.1. The frequency is being revised to make it consistent with the change proposed in LCO 3.4.5 for this frequency.
- P.7 The Completion Time is revised to make it consistent with the current Technical Specifications.
- P.8 The terminology is revised to make it consistent with the proposed Technical Specifications.

P.9 This change reflects changes previously proposed in letter

CHANGE/IMPROVEMENT TO NUREG STS

C.1 "Containment" changed to "drywell" for accuracy.