

## TECHNICAL SPECIFICATION CHANGE REQUEST NO. 104

Replace page 3/4 6-15 with the attached revised page 3/4 6-15.

### PROPOSED CHANGE

Add ACTION Statement "f" to read:

- f. The provisions of Specification 3.0.4 are not applicable for the remainder of Cycle IV for the Intermediate Pressure Relief Line Isolation Valve, WDV-60.

### REASON FOR PROPOSED CHANGE

WDV-60 has exhibited leakage in excess of local leak rate testing requirements. Efforts to repair the valve proved unsuccessful. The valve has been removed and replaced with a welded pipe cap. The cap is performing the post accident containment isolation function, thus ACTION Statement "c" is in effect. Since the penetration is in the post accident containment isolation configuration and neither performs an emergency core cooling function, nor offers any hindrance to normal plant operations while 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 exempted. 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 "f" ensures the penetration performs its post-containment isolation function. Therefore, the entry into other OPERATIONAL MODES should not be prohibited because the penetration will be performing its isolation function and would not contribute to an accident if containment isolation was required.

## CONTAINMENT SYSTEMS

### 3/4.6.3 CONTAINMENT ISOLATION VALVES

#### LIMITING CONDITION FOR OPERATION

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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, or
- c. Isolate each affected penetration within 4 hours by use of at least one closed manual valve or blind flange; 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 for Main Steam Isolation Valves MSV 411, 412, 413 and 414.
- f. The provisions of Specification 3.0.4 are not applicable for the remainder of Cycle IV for Intermediate Pressure Relief Line Isolation Valve, WDV-60.

#### **SURVEILLANCE REQUIREMENTS**

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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.