

ATTACHMENT 1

MARKED-UP TECHNICAL SPECIFICATION PAGES

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CONTAINMENT SYSTEMS

CONTAINMENT LEAKAGE

LIMITING CONDITION FOR OPERATION

3.6.1.2 Containment leakage rates shall be limited to:

- a. An overall integrated leakage rate of:
 1. Less than or equal to L_a , 0.20 percent by weight of the containment air per 24 hours at P_a , 47.1 psig, or
 2. Less than or equal to L_t , 0.10 percent by weight of the containment air per 24 hours at a reduced pressure of P_t , 23.6 psig.
- b. A combined leakage rate of less than 0.60 L_a for all penetrations and valves subject to Type B and C tests, when pressurized to P_a .

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With either (a) the measured overall integrated containment leakage rate exceeding 0.75 L_a or 0.75 L_t , as applicable, or (b) with the measured combined leakage rate for all penetrations and valves subject to Types B and C tests exceeding 0.60 L_a , restore the overall integrated leakage rate to less than or equal to 0.75 L_a or less than or equal to 0.75 L_t , as applicable, and the combined leakage rate for all penetrations subject to Type B and C tests to less than 0.60 L_a prior to increasing the Reactor Coolant System temperature above 200°F.

SURVEILLANCE REQUIREMENTS

4.6.1.2 The containment leakage rates shall be demonstrated at the following test schedule and shall be determined in conformance with the criteria specified in Appendix J of 10 CFR 50 using the methods and provisions of ANSI N45.4-1972:

- a. Three Type A tests (Overall Integrated Containment Leakage Rate) shall be conducted at 40 ± 10 month intervals during shutdown at either P_a (47.1 psig) or at P_t (23.6 psig) during each 10-year service period. The third test of each set shall be conducted during the shutdown for the 10-year plant inservice inspection.

* A one time extension of the test interval is allowed for the third Type A test within the first 10-year service period, provided unit shutdown occurs no later than June 1, 1993 and performance of the Type A test occurs prior to unit restart following RF7.

3/4.6 CONTAINMENT SYSTEMS

BASES

3/4.6.1 PRIMARY CONTAINMENT

3/4.6.1.1 CONTAINMENT INTEGRITY

Primary CONTAINMENT INTEGRITY ensures that the release of radioactive materials from the containment atmosphere will be restricted to those leakage paths and associated leak rates assumed in the accident analyses. This restriction, in conjunction with the leakage rate limitation, will limit the site boundary radiation doses to within the limits of 10 CFR 100 during accident conditions.

3/4.6.1.2 CONTAINMENT LEAKAGE

The limitations on containment leakage rates (including those used in demonstrating a 30 day water seal) ensure that the total containment leakage volume will not exceed the value assumed in the accident analyses at the peak accident pressure, P. As an added conservatism, the measured overall integrated leakage rate is further limited to less than or equal to 0.75 L₀ or 0.75 L₁, as applicable, during performance of the periodic test to account for possible degradation of the containment leakage barriers between leakage tests.

The surveillance testing for measuring leakage rates are consistent with the requirements of Appendix "J" of 10 CFR 50.*

3/4.6.1.3 REACTOR BUILDING AIR LOCKS

The limitations on closure and leak rate for the reactor building air locks are required to meet the restrictions on CONTAINMENT INTEGRITY and containment leak rate. Surveillance testing of the air lock seals provide assurance that the overall air lock leakage will not become excessive due to seal damage during the intervals between air lock leakage tests.

- * A one time extension of the test interval is allowed for the third Type A test within the first 10-year service period, as required by Surveillance Requirement 4.6.1.2.a and by section III.D.1.(a) of Appendix J. of 10CFR50, provided unit shutdown occurs no later than June 1, 1993 and performance of the Type A test occurs prior to unit restart following RF7.

ATTACHMENT 2

DESCRIPTION OF AMENDMENT REQUEST AND
SAFETY EVALUATION

PROPOSED TECHNICAL SPECIFICATION CHANGE AND
SAFETY EVALUATION FOR THE VIRGIL C. SUMMER NUCLEAR STATION

DESCRIPTION OF AMENDMENT REQUEST

SCE&G proposes to modify the VCSNS Technical Specifications to request a one-time extension of the 40 +/- 10 month, type A, test schedule as described by containment system surveillance requirement (SR) 4.6.1.2.a. The proposed change would permit the third containment integrated leak rate test (ILRT) to be performed during refueling outage 7 (RF7). The current SR 4.6.1.2.a states:

"Three Type A tests (Overall Integrated Containment Leakage Rate) shall be conducted at 40 +/- 10 month intervals during shutdown at Pa (47.1 psig) or Pt (23.6 psig) during each 10-year service period. The third test of each set shall be conducted during the shutdown for the 10-year plant inservice inspection."

SCE&G proposes to add a footnote to allow a one-time extension of the current test interval. The footnote reads as follows: "A one-time extension of the test interval is allowed for the third Type A test within the first 10-year service period provided unit shutdown occurs no later than June 1, 1993, and performance of the Type A test occurs prior to unit restart following RF7."

REASON FOR CHANGE

In accordance with the 40 +/- 10 month test interval, VCSNS would be required to perform its third periodic Type A test on or before February 9, 1993 (50 months). Application of the 40 +/- 10 month rule would require SCE&G to perform a Type A test during RF6 (presently scheduled for fall of 1991) and then repeat it during RF7 (presently scheduled for spring of 1993) since the third Type A test (ILRT) is required to be performed during the shutdown for the 10-year plant inservice inspection.

The proposed modification to the Type A test schedule is a one-time exemption to the required test interval. The proposed extension of the 40 +/- 10 month test interval would enable VCSNS to complete its seventh fuel cycle without having back-to-back refueling outages requiring Type A tests. Considering that all plant maintenance activities and modifications are implemented under plant administrative control combined with the fact that no operational transients have occurred that would have adversely affected containment integrity, SCE&G finds no reason to suspect degradation in the containment since the last Type A test was completed.

SAFETY EVALUATION:

The results of the previous two Type A test have shown the overall leakage from the containment building has remained at very low levels. Based on the test data (test data has 95% upper confidence level) from the previous two Type A tests, 0.094 percent per day (Type A test performed in October 1984) and 0.1057 percent per day (Type A test performed in December 1988), the overall leak rate has consistently remained well below acceptable levels (acceptance criteria for VCSNS Type A tests is 0.15 percent per day). Given these historical margins, combined with the fact that all plant maintenance activities and modifications are implemented under plant administrative control and the fact that the containment has not been subjected to any operational transients adversely affecting the containment integrity, SCE&G considers the proposed change to be justified.

ATTACHMENT 3

DESCRIPTION OF AMENDMENT REQUEST
AND
NO SIGNIFICANT HAZARDS CONSIDERATION

DESCRIPTION OF AMENDMENT REQUEST

SCE&G proposes to modify the VCSNS Technical Specifications to request a one-time extension of the 40 +/- 10 month, type A, test schedule as described by containment system surveillance requirement (SR) 4.6.1.2.a. The proposed change would permit the third containment integrated leak rate test (ILRT) to be performed during refueling outage 7 (RF7). The current SR 4.6.1.2.a states:

"Three Type A tests (Overall Integrated Containment Leakage Rate) shall be conducted at 40 +/- 10 month intervals during shutdown at Pa (47.1 psig) or Pt (23.6 psig) during each 10-year service period. The third test of each set shall be conducted during the shutdown for the 10-year plant inservice inspection."

SCE&G proposes to add a footnote to allow a one-time extension of the current test interval. The footnote reads as follows: "A one-time extension of the test interval is allowed for the third Type A test within the first 10-year service period provided unit shutdown occurs no later than June 1, 1993, and performance of the Type A test occurs prior to unit restart following the RF7."

REASON FOR CHANGE

In accordance with the 40 +/- 10 month test interval, VCSNS would be required to perform its third periodic Type A test on or before February 9, 1993, (50 months). Application of the 40 +/- 10 month rule would require SCE&G to perform a Type A test during RF6 (presently scheduled for fall of 1991) and then repeat it during the RF7 refueling outage (presently scheduled for spring of 1993) since the third Type A test (ILRT) is required to be performed during the shutdown for the 10-year plant inservice inspection.

The proposed modification to the Type A test schedule is a one-time exemption to the required test interval. The proposed extension of the 40 +/- 10 month test interval would enable VCSNS to complete its seventh fuel cycle without having back-to-back refueling outages requiring Type A tests. Considering that all plant maintenance activities and modifications are implemented under plant administrative control combined with the fact that no operational transients have occurred that would have adversely affected containment integrity, SCE&G finds no reason to suspect degradation in the containment since the last Type A test was completed.

BASIS FOR PROPOSED NO SIGNIFICANT HAZARDS CONSIDERATION:

SCE&G has evaluated the proposed Technical Specification change and determined that it does not represent a significant hazards consideration base on criteria established in 10CFR50.92(c). Operation of VCSNS with the proposed amendment will not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed change is a one-time extension of the 40 +/- 10 month, Type A test interval as contained in Surveillance Requirement 4.6.1.2.a. The purpose of the Type A test is to ensure that leakage from the primary containment through systems and components penetrating primary containment does not exceed allowable leakage rate values specified in the Tech Specs (VCSNS limit is 0.75 La which equates to 0.15 percent per day). Testing pursuant to SR 4.6.1.2.a was last satisfactorily completed on 12/88 at which time the actual measured leak rate was well below the required value of the plant's Technical Specifications. SCE&G therefore concludes that extending the surveillance interval would not cause a significant increase in the probability or consequences of an accident previously evaluated.
- (2) Create the possibility of a new or different kind of accident from any previously analyzed. No new accident scenarios are created by the proposed change because the one-time extension affects only the test frequency and does not affect the physical containment structure, the penetrations or the facility. Previous Type A test results have shown the leak rates have remained well below the 0.75 La (0.15 percent per day) limit. Because the leakage limit has not been compromised, the requested extension of the test interval will in no way create the possibility of a new or different kind of accident from any previously analyzed.
- (3) Involve a significant reduction in the margin of safety. The test data (test data has 95% upper confidence level) from the previous two Type A tests, 0.094 percent per day (Type A test performed in October 1984) and 0.1057 percent per day (Type A test performed in December 1988), the overall leak rate has consistently remained well below acceptable levels (acceptance criteria for VCSNS Type A tests is 0.15 percent per day). Based on the previous measured leakage rates combined with the design modification and process control administrative procedures, the one-time extension of the 40 +/- 10 month, Type A, test interval would not involve a significant reduction in the margin of safety.