

# Maine Yankee

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May 25, 1994

MN-94-52

GDW-94-51

Proposed Change No. 183

UNITED STATES NUCLEAR REGULATORY COMMISSION

Attention: Document Control Desk

Washington, DC 20555

References: (a) License No. DPR-36 (Docket No. 50-309)  
(b) Standard Technical Specifications for Combustion Engineering Plants (NUREG 1432) of September 1992

Subject: Proposed Technical Specification Change No. 183 - Containment and Installed Ventilation and Filter Systems Limiting Conditions for Operations Requirements

Gentlemen:

Maine Yankee hereby submits, pursuant to 10CFR50.90, this application to amend sections of the Maine Yankee Technical Specifications. This proposed change includes changes that will permit the accomplishment of maintenance evolutions. Several Technical Specification maintenance evolutions have been interpreted to result in safety functions being temporarily (typically 15 minutes or less) inoperable. These interpretations have resulted in submission of reports to the NRC in accordance with 10CFR50.73. The purpose of the proposed changes is to provide recognition of these interpretations within Maine Yankee Technical Specifications.

The first proposed change is to modify Specification 3.11, Containment, as follows:

- a. A change is proposed to add a new exception to Specification 3.11.B which addresses an inoperable personnel air lock hatch. The proposed exception, consistent with Reference (b), would permit containment entry and exit for seven days under administrative controls.
- b. Changes are proposed to delete three existing valves from and to add three new valves to Exception No. 2. In addition, a new exception to Specification 3.11.B is proposed which recognizes a change in the Containment Isolation boundary.

The second proposed change is to modify Specification 3.25, Installed Ventilation and Filter Systems, as follows:

- a. Changes are proposed to structure this specification to be consistent with Maine Yankee Technical Specification format and to clarify the existing Remedial Action of Specifications 3.25.A and 3.25.B.

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- b. The addition of an exception is proposed to Specification 3.25.B, Control Room Ventilation System, which addresses inoperability of both trains of the system. The proposed exception permits both Control Room ventilation trains to be inoperable under administrative controls for the purposes of conducting planned maintenance for up to 30 minutes each quarter.

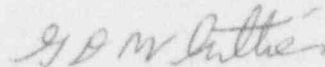
A description of the proposed changes and a summary of the Significant Hazards Evaluation is presented in Attachment A. As discussed in the attachment, these changes do not involve a significant increase in the probability or consequences of an accident previously evaluated, create the possibility of a new or different kind of accident from any accident previously evaluated, or involve a significant reduction in a margin of safety. Based on our evaluation, we conclude there is reasonable assurance that operation of the Maine Yankee plant, consistent with the proposed Technical Specifications, will not impact the health and safety of the public.

Revised Technical Specification Pages 3.11-2, 3.11-5, 3.11-6, 3.25-1 and 3.25-2 are included as Attachment B.

This proposed change has been reviewed and approved by the Plant Operation Review Committee. The Nuclear Safety Audit and Review Committee has also reviewed this submittal. A representative of the State of Maine is being informed of this request by a copy of this letter.

We request that this proposed change be made effective coincident with the planned change in Containment Isolation boundary and not later than July 28, 1994.

Very truly yours,



G. D. Whittier, Vice President  
Licensing & Engineering


WRD/jag

Attachment

c: Mr. Thomas T. Martin  
Mr. J. T. Yerokun  
Mr. E. H. Trottier  
Mr. Patrick J. Dostie  
Mr. Clough Toppan

STATE OF MAINE

Then personally appeared before me, G. D. Whittier, who being duly sworn did state that he is Vice President, Licensing and Engineering of Maine Yankee Atomic Power Company, that he is duly authorized to execute and file the foregoing request in the name and on behalf of Maine Yankee Atomic Power Company, and that the statements therein are true to the best of his knowledge and belief.



Notary Public

Donna L. Pelletier, Notary Public  
State of Maine  
My Commission Expires 12/12/90

## ATTACHMENT A

### Description of Proposed Changes

#### Specification 3.11

Technical Specification 3.11, Containment, requires at least one hatch in the personnel air lock to be properly closed and sealed when containment integrity is required. In order to perform repairs on an inoperable inner hatch, entry through the outer hatch is required resulting in a short period of time when the containment boundary is not intact.

The proposed exception to Specification 3.11.B allows entry and exit to perform repairs on an affected air lock component that affects hatch operability. After each entry and exit, the operable hatch is immediately closed. The proposed exception permits use of only one operable air lock hatch for entry and exit for seven days under administrative controls (under the control of a dedicated individual). Containment entry may also be required to perform Technical Specification (TS) Surveillances and required actions, as well as other activities inside containment. This exception is not intended to preclude performing other required activities (i.e., non-TS-required activities) if containment is entered using an inoperable air lock. The ability to open the operable hatch, even if it means the containment boundary is temporarily not intact, is acceptable because of the low probability of an event that could pressurize the containment during the short time in which the operable hatch is expected to be open. This exception is consistent with Reference (b).

A change to Specification 3.11.B is proposed to add three Main Steam valves (MS-228, 230, and 232) to the list of valves identified in Exception No. 2. These valves are normally shut and isolate the Non-Return Valve (NRV) Vacuum Assist System from the Main Steam System. The three valves are being added to this list as a result of a change in the Containment Isolation boundary from the NRVs to the Excess Flow Check Valves (EFCVs). The three valves are opened by procedure to provide vacuum assist to the NRVs during the plant cooldown process. The same Containment Isolation boundary change results in valves HPD-4,9, and 14 being within the new Containment Isolation boundary. Thus, the proposed change deletes these valves from the list of valves in Exception No. 2.

In addition, a new exception to Specification 3.11.B is proposed to permit Surveillance Testing of the EFCVs. During the surveillance of Specification 4.6.C, each EFCV one at a time is made inoperable for approximately 5 minutes to perform the test. Use of this exception for 15 minutes per quarter would result in an unavailability of  $1.1E-4$  which when combined with the frequency of a design basis event, results in a negligible increase in core damage frequency.

#### Specification 3.25

Technical Specification 3.25.B, Installed Ventilation Systems, requires two trains of Control Room ventilation whenever the reactor is critical and provides Remedial Action if one train is inoperable. Infrequently, but periodically, equipment has been taken out of service that could affect both trains. These occasions have been primarily associated with the conduct of quarterly planned maintenance on the system air handler units. In each case, the planned maintenance was performed while the plant was on-line with the expectation it would make the equipment more reliable. Maine Yankee experience indicates filter replacement quarterly is necessary in order to preclude degradation in air flow.

The proposed change provides an exception statement to Specification 3.25.B that permits planned maintenance on the Control Room Ventilation System to be conducted under administrative controls when that maintenance would result in both trains being inoperable for very short periods of time. Thirty minutes is provided for each occurrence and is based on plant operating experience that minor planned maintenance can be completed in this time period. Use of this exception for 30 minutes per quarter would result in an unavailability of  $2.3E-4$  which when combined with the frequency of a design basis event, results in a negligible increase in the probability of exceeding of the requirements of General Design Criteria 19 of 10CFR50, Appendix A.

Changes to Specification 3.25 are proposed to structure this specification in Maine Yankee Technical Specification format and to clarify the required reactor operating condition in the existing Remedial Action for Specifications 3.25.A and 3.25.B by deleting the specified end state time and condition. Both end states were inconsistent with Specification 3.0.A.2 and by deleting them, Specification 3.0.A.2 would be applicable.

### Significant Hazards Evaluation

The proposed changes to Technical Specifications 3.11 and 3.25 have been evaluated against the standards of 10CFR50.92 and have been determined to not involve a significant hazards consideration. These proposed changes do not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated. These changes will not significantly increase the probability or consequences of an accident because short time entry into the proposed exceptions for Specifications 3.11 and 3.25 do not alter any associated remedial action completion times or those of Specification 3.0.A. Restoration to an operable status can be accomplished quickly to further reduce the potential consequences. For Specification 3.11, due to the low probability of a design basis accident event occurring concurrent with the proposed containment entry or exit to perform on-line personnel air lock hatch maintenance, the incremental risk of a breach in containment integrity is negligible. Closing an open operable air lock hatch can be accomplished quickly by operator action to further reduce the potential consequences. Since MS-228, 230, and 232 are only opened after the reactor plant is shutdown and cooldown commenced and since HPD-4, 9, and 14 are only opened during the plant heat-up process, there is insignificant change in the probability or consequences of an accident previously evaluated.
2. Create the possibility of a new or different kind of accident from any accident previously evaluated. The addition of the proposed exceptions and changes to Specifications 3.11 and 3.25 will not affect equipment reliability when equipment is required to be operable. The Limiting Conditions for Operation and associated remedial action statements govern operability of the equipment. These changes do not alter the applicability of these specifications. The current Technical Specifications allow the plant to operate with one personnel air lock hatch inoperable. This change to Technical Specification 3.11.B does not change that limit. Performance of maintenance on an inoperable hatch does not affect the ability of the operable hatch to close or remain closed. MS-228, 230, and 232 are opened only after the reactor plant is shutdown. HPD-4, 9, and 14 are only opened during plant heat-up and are closed prior to the plant entering power operation. These changes do not affect the design of the plant and do not permit the continued operation of the plant outside the currently allowed modes of operation.

3. Involve a significant reduction in a margin of safety. This change to Specification 3.11.B allows an EFCV to be inoperable or the operable air lock hatch to be open for only a short period of time. MS-228, 230, and 232 are opened only after the reactor plant is shutdown. HPD-4, 9, and 14 are only opened during plant heat-up and are closed prior to the plant entering power operation. Because of the short period when the containment boundary is not intact and because containment isolation can be easily reestablished prior to a significant release, there is no significant reduction in a margin of safety. For Specification 3.25, these changes do not significantly alter the availability or condition of applicable equipment and therefore do not alter the accident analyses or their conclusions associated with that equipment. This Technical Specification change permits the Control Room Ventilation System to be out of service for a short period of time. Because of the short period when the safety function is unavailable and because operation is easily reestablished, there is not a significant reduction in a margin of safety.

The above information illustrates that there is reasonable assurance that operation of the Maine Yankee plant, consistent with the proposed Technical Specifications, will not endanger the health and safety of the public.