

**Proposed Changes to the
Current Technical Specifications**

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:
 1. 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.

July 10
*Operation may continue after ~~March 15~~, 1994, until the next COLD SHUTDOWN, provided the drywell floor drain sump flow rate is monitored and determined by alternate means at least once per 8 hours. Additionally, the drywell atmosphere particulate and gaseous radioactivity monitoring systems may be periodically taken out-of-service to perform scheduled preventive maintenance, surveillances and testing without entering the shutdown requirements of the ACTION statement.

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

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:

- a. Drywell floor drain sump monitoring system; [and] e (B1)
 - b. One channel of either drywell atmospheric particulate or atmospheric gaseous monitoring system; [and] (B1)
 - c. Drywell air cooler condensate flow rate monitoring system]. e (B1)
- Handwritten notes: A cloud labeled "drywell" with "PA" above it has an arrow pointing to item b. Another cloud labeled "monitoring system" with "PA" above it has an arrow pointing to item a. Both clouds have "B1" in a circle next to them.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Drywell floor drain sump monitoring system inoperable.	<p>-----NOTE----- LCO 3.0.4 is not applicable. -----</p> <p>A.1 Restore drywell floor drain sump monitoring system to OPERABLE status.</p>	30 days

(continued)

Handwritten note: A cloud labeled "P9" with "Insert 14" inside it. An arrow points from this cloud to the "30 days" completion time in the table above.

INSERT 14

-----NOTE-----

Operation may continue after
July 10, 1994, until the next
entry into MODE 4, provided the
drywell floor drain sump flow rate
is monitored and determined by
alternate means once per 8 hours.

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

PA

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, ~~either the flow monitoring or the sump 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.

SUMP INLET

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 monitor and the drywell air cooler condensate flow rate monitor will provide indications of changes in leakage. (B1)

With the drywell floor drain sump monitoring system inoperable, but with RCS unidentified and total LEAKAGE being determined every 12 hours (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

P9

P6

12

Insert B33

(continued)

INSERT B33

This Completion Time is modified by a Note that identifies that the 30 day Completion Time may be extended until the next plant shutdown to MODE 4 provided the drywell floor drain sump flow rate is monitored and determined by alternate means at least once per 8 hours. Prior to plant restart from that shutdown, the V-notch sump inlet flow monitoring system must be restored to OPERABLE status.

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 U-602303.

CHANGE/IMPROVEMENT TO NUREG STS

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