

CONTAINMENT SYSTEMS

MSIV LEAKAGE CONTROL SYSTEM

LIMITING CONDITION FOR OPERATION

3.6.1.4 Two independent MSIV leakage control system (LCS) subsystems shall be OPERABLE.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

ACTION:

With one MSIV leakage control system subsystem inoperable, restore the inoperable subsystem to OPERABLE status within 30 days or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

SURVEILLANCE REQUIREMENTS

4.6.1.4 Each MSIV leakage control system subsystem shall be demonstrated OPERABLE:

- a. At least once per 31 days by verifying:
 1. Blower OPERABILITY by starting the blower(s) from the control room and operating the blower(s) for at least 15 minutes.
 2. Inboard heater OPERABILITY by demonstrating electrical continuity of the heating element circuitry by verifying the inboard heater draws $8.28 \pm 10\%$ amperes per phase.
- b. During each COLD SHUTDOWN, if not performed within the previous 92 days, by cycling each motor operated valve, including the main steam stop valves, through at least one complete cycle of full travel.
- c. At least once per 18 months by:
 1. Performance of a functional test which includes simulated actuation of the subsystem throughout its operating sequence, and verifying that each automatic valve actuates to its correct position, and the blower(s) start(s).
 2. Verifying that the blower(s) develop(s) at least the below required vacuum at the rated capacity:
 - a) Inboard system, 15" H₂O at ≥ 100 scfm.
 - b) Outboard system, 15" H₂O at ≥ 200 scfm.
- d. By verifying the inboard flow and inboard and outboard pressure instrumentation to be OPERABLE by performance of a:
 1. CHANNEL FUNCTIONAL TEST at least once per 31 days, and
 2. CHANNEL CALIBRATION at least once per 18 months.

PERRY - UNIT 1

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* The provisions of Technical Specification 3.0.4 are not applicable during Cycle Operation.

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SIGNIFICANT HAZARDS CONSIDERATION

The standards used to arrive at a determination that a request for amendment involves no significant hazards considerations are included in the Commission's Regulations, 10 CFR 50.92, which state that the operation of the facility in accordance with the proposed amendment would not (1) involve 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 evaluated, or (3) involve a significant reduction in a margin of safety.

The proposed amendment has been reviewed with respect to these three factors and it has been determined that the proposed change does not involve a significant hazard because:

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The probability of an accident (Recirculation Line Break LOCA for which the MSIV-LCS is credited) occurring for the duration of the TS 3.6.1.4 Action statement with unavailability of the Outboard MSIV-LCS has been shown to be less than 1×10^{-6} /reactor-year. Therefore, the probability of an accident is not significantly increased and is of a magnitude that consideration of additional compensatory measures, per ANSI/ANS 52.1-1983, is not required.

The consequences of an accident are not significantly increased in that the Outboard MSIV-LCS will be available to mitigate the consequences of an accident during the period that the Inboard MSIV-LCS is unavailable. Since the Inboard MSIV-LCS will be recovered well within the 30-day Allowable Outage Time, assurance is provided that the assumption that the Outboard MSIV-LCS is available is valid. The single failure criterion is relaxed while in the action statement (Generic Letter dated April 10, 1980).

2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change to permit inoperability of the Inboard MSIV-LCS during periods of startup and power ascension to 50% RTP and during shutdown below 50% RTP does not create the possibility of a new or different kind of accident previously evaluated. The Inboard MSIV-LCS is only credited during a Recirculation Line Break LOCA wherein Reactor Coolant System depressurization occurs. The failure of the Inboard MSIV-LCS can be mitigated by the Outboard MSIV-LCS.

3. The proposed change does not involve a significant reduction in a margin of safety.

The response to the Recirculation Line Break LOCA will not be significantly affected since the Outboard MSIV-LCS can be assumed to be available. In the unlikely situation that the Outboard MSIV-LCS is unavailable to treat the leakage past the MSIVs, the leakage will be routed to the condenser. Although PNPP has not yet performed the seismic walkdowns of the turbine line piping, which has been installed and supported in accordance with ANSI B31.1, from a qualitative standpoint it is reasonably expected that the piping will withstand the assumed earthquake. Efforts by the Boiling Water Reactor Owners Group have shown the benefits on dose assessments in containing the Regulatory Guide 1.3 source terms in the condenser. Therefore, since 10 CFR Part 100 is not violated, the proposed change does not involve a significant reduction in the margin of safety.