

Attachment 4
ULNRC-03151

PROPOSED TECHNICAL SPECIFICATION CHANGES

SPECIFICATIONS: 4.6.1.7.4 MARKUP

SPECIFICATIONS: 4.6.1.7.4 RETYPED

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CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS

4.6.1.7.1 Each 36-inch containment shutdown purge supply and exhaust isolation valve(s)* shall be verified blank flanged and closed at least once per 31 days.

4.6.1.7.2 Each 36-inch containment shutdown purge supply and exhaust isolation valve and its associated blank flange shall be leak tested at least once per 24 months and following each reinstallation of the blank flange when pressurized to P_a , 48.1 psig, and verifying that when the measured leakage rate for these valves and flanges, including stem leakage, is added to the leakage rates determined pursuant to Specification 4.6.1.2d. for all other Type B and C penetrations, the combined leakage rate is less than $0.60 L_a$.

4.6.1.7.3 The cumulative time that all 18-inch containment mini-purge supply and exhaust isolation valves have been open during a calendar year shall be determined at least once per 7 days.

4.6.1.7.4 At least once per 3 months each 18-inch containment mini-purge supply and exhaust isolation valve with resilient material seals shall be demonstrated OPERABLE by verifying that the measured leakage rate is less than $0.05 L_a$ when pressurized to P_a .

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for these valves is added to the leakage rates determined pursuant to Specification 4.6.1.2d for all other Type B and C penetrations, the combined leakage rate is less than $0.60 L_a$.

*Except valves and flanges which are located inside containment. These valves shall be verified to be closed with their blank flanges installed prior to entry into MODE 4 following each COLD SHUTDOWN.

BASES3/4.6.1.7 CONTAINMENT VENTILATION SYSTEM

The 36-inch containment purge supply and exhaust isolation valves are required to be closed and blank flanged during plant operations since these valves have not been demonstrated capable of closing during a LOCA or steam line break accident. Maintaining these valves closed and blank flanged during plant operation ensures that excessive quantities of radioactive material will not be released via the Containment Purge System. To provide assurance that the 36-inch containment valves cannot be inadvertently opened, the valves are blank flanged.

The use of the containment mini-purge lines is restricted to the 18-inch purge supply and exhaust isolation valves since, unlike the 36-inch valves, the 18-inch valves are capable of closing during a LOCA or steam line break accident. Therefore, the SITE BOUNDARY dose guideline values of 10 CFR Part 100 would not be exceeded in the event of an accident during containment purging operation. Operation will be limited to 2000 hours during a calendar year. The total time the Containment Purge (vent) System isolation valves may be open during MODES 1, 2, 3, and 4 in a calendar year is a function of anticipated need and operating experience. Only safety-related reasons; e.g., containment pressure control or the reduction of airborne radioactivity to facilitate personnel access for surveillance and maintenance activities, should be used to support additional time requests. Only safety-related reasons should be used to justify the opening of these isolation valves during MODES 1, 2, 3, and 4 in any calendar year regardless of the allowable hours.

Leakage integrity tests with a maximum allowable leakage rate for containment purge supply and exhaust supply valves will provide early indication of resilient material seal degradation and will allow opportunity for repair before gross leakage failures could develop. The 0.60 L_g leakage limit of Specification 3.6.1.2b. shall not be exceeded when the leakage rates determined by the leakage integrity tests of these valves are added to the previously determined total for all valves and penetrations subject to Type B and C tests.

3/4.6.2 DEPRESSURIZATION AND COOLING SYSTEMS3/4.6.2.1 CONTAINMENT SPRAY SYSTEM

The OPERABILITY of the Containment Spray System ensures that containment depressurization and cooling capability will be available in the event of a LOCA or steam line break. The pressure reduction and resultant lower containment leakage rate are consistent with the assumptions used in the safety analyses.

The Containment Spray System and the Containment Cooling System are redundant to each other in providing post-accident cooling of the Containment atmosphere. However, the Containment Spray System also provides a mechanism for removing iodine from the containment atmosphere and therefore the time requirements for restoring an inoperable spray system to OPERABLE status have been maintained consistent with that assigned other inoperable ESF equipment.

3/4.6.2.2 SPRAY ADDITIVE SYSTEM

The OPERABILITY of the Spray Additive System ensures that sufficient NaOH is added to the containment spray in the event of a LOCA. The limits on NaOH volume and concentration ensure a pH value of between 8.5 and 11.0 for the

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4.6.1.7.3 The cumulative time that all 18-inch containment mini-purge supply and exhaust isolation valves have been open during a calendar year shall be determined at least once per 7 days.

4.6.1.7.4 At least once per 3 months each 18-inch containment mini-purge supply and exhaust isolation valve with resilient material seals shall be demonstrated OPERABLE by verifying that when the measured leakage rate for these valves is added to the leakage rates determined pursuant to Specification 4.6.1.2d for all other Type B and C penetrations, the combined leakage rate is less than $0.60 L_s$.

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CONTAINMENT SYSTEMS

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Leakage integrity tests for containment purge supply and exhaust supply valves will provide early indication of resilient material seal degradation and will allow opportunity for repair before gross leakage failures could develop. The 0.60 L_g leakage limit of Specification 3.6.1.2b. shall not be exceeded when the leakage rates determined by the leakage integrity tests of these valves are added to the previously determined total for all valves and penetrations subject to Type B and C tests.

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