

- b. Two of the fourteen suppression chamber - drywell vacuum breakers may be inoperable provided that they are secured in the closed position.
  - c. One position alarm circuit for each operable vacuum breaker may be inoperable for up to 15 days provided that each operable suppression chamber - drywell vacuum breaker with one defective alarm circuit is physically verified to be closed immediately and daily during this period.
6. After completion of the startup test program and demonstration of plant electrical output, the primary containment atmosphere shall be reduced to less than 5.0% O<sub>2</sub> with nitrogen gas within 24 hours and less than 4% O<sub>2</sub> with nitrogen gas within 48 hours after the reactor mode selector switch is placed in the run mode. Primary containment deinerting may commence 24 hours prior to a scheduled shutdown.
7. If specifications 3.5.A.1.a, b, c(1) and 3.5.A.2 through 3.5.A.5 cannot be met, reactor shutdown shall be initiated and the reactor shall be in the cold shutdown condition within 24 hours.
8. Shock Suppressors (Snubbers)
- a. During all modes of operation except cold shutdown and refuel, all safety related snubbers listed in Table 3.5.1 shall be operable except as noted 3.5.A.8.b, c and d below.
  - b. From and after the time that a snubber is determined to be inoperable, continued reactor operation is permissible only during the succeeding 72 hours unless the snubber is sooner made operable or replaced.
  - c. If the requirements of 3.5.A.8.a and 3.5.A.8.b cannot be met, an orderly shutdown shall be initiated and the reactor shall be in a cold shutdown condition within 36 hours.
  - d. If a snubber is determined to be inoperable while the reactor is in the shutdown or refuel mode, the snubber shall be made operable or replaced prior to reactor startup.
  - e. Snubbers may be added to safety related systems without prior License Amendment to Table 3.5.1 provided that a revision to Table 3.5.1 is included with the next License Amendment request.
9. Drywell-Suppression Chamber Differential Pressure
- a. Differential pressure between the drywell and suppression chamber shall be maintained within the acceptable operating range shown on Figure 3.5-1 within 24 hours after the reactor mode selector switch is placed in the run mode. The differential pressure may be reduced to less than the range shown on Figure 3.5-1 24 hours prior to a scheduled shutdown. The differential pressure may be decreased to less than the required value for a maximum of four hours during required operability testing of the drywell-pressure suppression chamber vacuum breakers.

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The capacity of the fourteen suppression chamber to drywell vacuum relief valves is sized to limit the external pressure of the drywell during post-accident drywell cooling operations to the design limit of 2 psi. They are sized on the basis of the Bodega Bay pressure suppression tests. (9) (10) In Amendment 15 of the Oyster Creek FDSAR, Section II, the area of 2920 sq. in. is stated as the minimum area for flow of non-condensable gases from the suppression chamber to the drywell. To achieve this requirement, at least 12 of the 14 vacuum breaker valves (18" diameter) must be operable.

Each suppression chamber drywell vacuum breaker is fitted with a redundant pair of limit switches to provide fail safe signals to panel mounted indicators in the Reactor Building and alarms in the Control Room when the disks are open more than 0.1" at any point along the seal surface of the disk. These switches are capable of transmitting the disk closed-to-open signal with 0.01" movement of the switch plunger. Continued reactor operation with failed components is justified because of the redundancy of components and circuits and, most importantly, the accessibility of the valve lever arm and position reference external to the valve. The fail-safe feature of the alarm circuits assures operator attention if a line fault occurs.

Conservative estimates of the hydrogen produced, consistent with the core cooling system provided, show that the hydrogen air mixture resulting from a loss-of-coolant accident is considerably below the flammability limit and hence it cannot burn, and inerting would not be needed. However, inerting of the primary containment was included in the proposed design and operation. The 5% oxygen limit is the oxygen concentration limit stated by the American Gas Association for hydrogen-oxygen mixtures below which combustion will not occur (4). The 4% oxygen limit was established by analysis of the Generation and Mitigation of Combustible Gas Mixtures in Inerted BWR Mark I Containments. (12)

To preclude the possibility of starting up the reactor and operating a long period of time with a significant leak in the primary system, leak checks must be made when the system is at or near rated temperature and pressure. It has been shown (9) (10) that an acceptable margin with respect to flammability exists without containment inerting. Inerting the primary containment provides additional margin to that already considered acceptable. Therefore, permitting access to the drywell for the purpose of leak checking would

not reduce the margin of safety below that considered adequate and is judged prudent in terms of the added plant safety offered by the opportunity for leak inspection. The 48 hour time to provide inerting is judged to be a reasonable time to perform the operation and establish the required O<sub>2</sub> limit.

Snubbers are designed to prevent restrained pipe motion under dynamic loads as might occur during an earthquake or severe transient, while allowing normal thermal motion during startup and shutdown. The consequence of an inoperable snubber is an increase in the probability of structural damage to piping as a result of a seismic or other event initiating dynamic loads. It is, therefore, required that all snubbers required to protect the primary coolant system or any other safety system or component be operable during reactor operation.

All safety related hydraulic snubbers are visually inspected for overall integrity and operability. The inspection will include verification of proper orientation, adequate hydraulic fluid level and proper attachment of snubber to piping and structures.

Examination of defective snubbers at reactor facilities and material tests performed at several laboratories (Reference 11) has shown that millable gum polyurethane deteriorates rapidly under the temperature and moisture conditions present in many snubber locations. Although molded polyurethane exhibits greater resistance to these conditions, it also may be unsuitable for application in the higher temperature environments. Data are not currently available to define precisely an upper temperature limit for the molded polyurethane. Lab tests and in-plant experience indicate that seal materials are available, primarily ethylene propylene compounds, which should give satisfactory performance under the most severe conditions expected in reactor installations.

Because snubber protection is required only during low probability events, a period of 72 hours is allowed for repairs or replacements. In case a shutdown is required, the allowance of 36 hours to reach a cold shutdown condition will permit an orderly shutdown consistent with standard operating procedures. Since plant startup should not commence with knowingly defective safety related equipment, Specification 3.5.A.8.d prohibits startup with inoperable snubbers.

Secondary containment (5) is designed to minimize any ground level release of radioactive materials which might result from a serious accident. The reactor building provides secondary containment during reactor operation when the drywell is sealed and in service and provides primary containment when the reactor is shutdown and the drywell is open, as during refueling. Because the secondary containment is an integral part of the overall containment system, it is required at all times that primary containment is required. Moreover, secondary

containment is required during fuel handling operations and whenever work is being performed on the reactor or its connected systems in the reactor building since their operation could result in inadvertent release of radioactive material.

The standby gas treatment system (6) filters and exhausts the reactor building atmosphere to the stack during secondary containment isolation conditions, with a minimum release of radioactive materials from the reactor building to the environs.

Two separate filter trains are provided each having 100% capacity. (6) If one filter train becomes inoperable, there is no immediate threat to secondary containment and reactor operation may continue while repairs are being made. Since the test interval for this system is one month (Specification 4.5), the time out-of-service allowance of 7 days is based on considerations presented in the Bases in Specification 3.2 for a one-out-of-two system.

- References:
- (1) FDSAR, Volume I, Section V-1
  - (2) FDSAR, Volume I, Section V-1.4.1
  - (3) FDSAR, Volume I, Section V-1.7
  - (4) Licensing Application, Amendment 11, Question III-25
  - (5) FDSAR, Volume I, Section V-2
  - (6) FDSAR, Volume I, Section V-2.4
  - (7) Licensing Application, Amendment 42
  - (8) Licensing Application, Amendment 32, Question 3
  - (9) Robbins, C. H., "Tests on a Full Scale 1/48 Segment of the Humboldt Bay Pressure Suppression Containment," GEAP-3596, November 17, 1960.
  - (10) Bodega Bay Preliminary Hazards Summary Report, Appendix 1, Docket 50-205, December 28, 1962.
  - (11) Report H. R. Erickson, Bergen-Paterson to K. R. Goller, NRC, October 7, 1974. Subject: Hydraulic Shock Sway Arrestors.
  - (12) General Electric NEDO-22155 "Generation and Mitigation of Combustible Gas Mixtures in Inerted BWR Mark I Containments" June 1982.

In conjunction with the Mark I Containment Short Term Program, a plant unique analysis was performed on August 2, 1976, which demonstrated a factor of safety of at least two for the weakest element in the suppression chamber support system. The maintenance of a drywell-suppression chamber differential pressure within the range shown on Figure 3.5-1 with a suppression chamber water level corresponding to a downcomer submergence range of 3.0 to 5.3 feet will assure the integrity of the suppression chamber when subjected to post-LOCA suppression pool hydrodynamic forces.

After the containment oxygen concentration has been reduced to meet the specification initially, the containment atmosphere is maintained above atmospheric pressure by the primary containment inerting system. This system supplies nitrogen makeup to the containment so that the very slight leakage from the containment is replaced by nitrogen, further reducing the oxygen concentration. In addition, the oxygen concentration is continuously recorded and high oxygen concentration is annunciated. Therefore, a weekly check of oxygen concentration is adequate. This system also provides capability for determining if there is gross leakage from the containment.

The drywell exterior was coated with Firebar D prior to concrete pouring during construction. The Firebar D separated the drywell steel plate from the concrete. After installation, the drywell liner was heated and expanded to compress the Firebar D to supply a gap between the steel drywell and the concrete. The gap prevents contact of the drywell wall with the concrete which might cause excessive local stresses during drywell expansion in a loss-of-coolant accident. The surveillance program is being conducted to demonstrate that the Firebar D will maintain its integrity and not deteriorate throughout plant life. The surveillance frequency is adequate to detect any deterioration tendency of the material. (8)

The operability of the instrument line flow check valves are demonstrated to assure isolation capability for excess flow and to assure the operability of the instrument sensor when required.

Because of the large volume and thermal capacity of the suppression pool, the volume and temperature normally changes very slowly and monitoring these parameters daily is sufficient to establish any temperature trends. By requiring the suppression pool temperature to be continually monitored and also observed during periods of significant heat addition, the temperature trends will be closely followed so that appropriate action can be taken. The requirement for an external visual examination following any event where potentially high loadings could occur provides assurance that no significant damage was encountered. Particular attention should be focused on structural discontinuities in the vicinity of the relief valve discharge since these are expected to be the points of highest stress.