

January 27, 1988

Docket No. 50-461

MEMORANDUM FOR: Daniel Muller, Director
Project Directorate III-2
Division of Reactor Projects III, IV, V
and Special Projects

FROM: John W. Craig, Chief
Plant Systems Branch
Division of Engineering and Systems Technology

SUBJECT: RESPONSE TO TIA - CLARIFICATION OF CLINTON TECHNICAL
SPECIFICATION 3.6.4; TAC NO. 66487

By memorandum dated October 21, 1987, C. E. Norelius of Region III to D. M. Crutchfield requested clarification from NRP of the requirements of the Technical Specifications (TS) when a containment isolation valve becomes inoperable. For the Clinton Power Station, the requirements are located in TS Section 3.6.4, "Containment Isolation Valve." The issue is the interpretation of the TS when the remaining operable barrier is a closed system. As written the TS assumes that the operable barrier is an automatic valve.

When the remaining barrier is a closed system, the staff has recognized the passive nature of the barrier. As a result, Action a.2 requires some degree of interpretation to properly comply with the requirements. The statement indicates that at least one deactivated automatic valve be secured in the isolated position to adequately isolate the affected penetration. Literal compliance of the action statement cannot be met for the case in question. However, the staff has focused on the need to deactivate the penetration as the key to meeting the action statement. Also, the statement indicates what is meant by the term "deactivate the penetration" for the typical penetration having two automatic isolation valves. It certainly does not mean that if the penetration has a closed system no further action is needed to comply with the requirement. Rather, the TS does not directly address what is needed for a penetration with a closed system as one of the two barriers.

The staff has interpreted ^{within the closed system} deactivating the penetration to mean that an existing system valve, not normally considered as a containment isolation valve be put into the locked closed position. Where more than one valve is available, we believe that the valve closest to the containment wall should be selected. However, it should be noted that no leak testing of the alternate valve is necessary to satisfy the action statement. The "do nothing" approach clearly does not meet the intent of the TS and therefore could be considered as a violation. If an alternate approach is selected by the licensee, justification should be provided to show how the penetration has been deactivated.

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Finally, we were asked to comment on the acceptability of a closed system serving as one of the two containment isolation barriers for a penetration. The staff has consistently recognized a closed system as an acceptable alternative to an automatic valve.

We consider our efforts on TAC No. 66487 to be complete.

John W. Craig

John W. Craig, Chief
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Enclosures:
As stated

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