January 28, 1992

Mr. J. Lee Robertson, Chairman
BWR Technical Specifications Committee
Grand Gulf Nuclear Power Station
P. O. Box 756
Support Services Building
Port Gibson, Mississippi 39150

Dear Mr. Roberston:

At the meeting with the Owners Groups on January 21, 1992, the BWR Owners identified a concern regarding an apparent inconsistency in the staff's position on primary system leak detection requirements.

The staff's position on leak detection in Generic Letter 88-01, for BWR plants operating with any IGSCC Category D, E, F, or G welds, requires at least one of the leakage measurement instruments associated with each sump be operable, and the outage time for inoperable instruments be limited to 24 hours. The staff subsequently concluded that RCS leakage measurements should be taken at least once per shift, rather than every 4 hours, but should not exceed 12 hours. Leakage can also be quantitatively measured by manually pumping the sump or measuring the differences in sump level. These manual leak rate measurements are an acceptable alternative, provided that the licensee demonstrates appropriate accuracy and inspectability, but continued use of such alternatives should be limited to 30 days. The intent of these requirements is to ensure that the total capability to quantitatively measure leakage is not lost for more than 24 hours, or the plant should immediately initiate an orderly shutdown.

Accordingly, we have developed the enclosed revised action statements in an effort to reconcile the surveillance frequency and completion times for inoperable leak detection instruments. We request your prompt review of the proposed changes, and your decision on whether you wish to appeal this issue at the next Executive meeting.

Sincerely,

Original Signed By

Christopher I. Grimes, Chief
Technical Specifications Branch
Division of Operational Events Assessment

Enclosure:
As stated

cc: W. Hall, NUMARC

DOCUMENT: A:\BWRLEAK.CIG

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3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.7 RCS ~~LEAKAGE~~ Leakage Detection Instrumentation

LCO 3.4.7 The following RCS ~~LEAKAGE~~ detection instrumentation shall be OPERABLE:

a. Drywell floor drain sump monitoring system; and

b. One channel of either ~~primary containment~~ drywell atmospheric particulate or atmospheric gaseous monitoring system; and

c. [Primary containment air coolers condensate flow rate monitoring system].

APPLICABILITY MODES 1,2, and 3.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Drywell floor drain sump monitoring system inoperable.	A.1 Perform SR 3.4.5.1 AND A.1 Restore drywell floor drain sump monitoring system to OPERABLE status.	Once per 8 hours 30 days
B. Required Actions and associated Completion Times of Condition A not met.	B.1 Restore drywell floor drain sump monitoring system to OPERABLE status.	24 hours
C. Required Actions and associated Completion Times of Condition B not met.	C.1 Be in MODE 3 AND C.2 Be in MODE 4	12 hours 36 hours
D. Required drywell atmospheric monitoring system inoperable.	D.1 Analyze grab sample of drywell atmosphere. AND D.1 Restore required atmospheric monitoring system to OPERABLE status.	Once per 12 hours 30 days
E. Primary containment air coolers condensate flow rate monitoring system inoperable.	E.1 To Be Provided By OGs.	Once per 12 hours
F. All required leakage detection systems inoperable	F.1 Enter LCO 3.0.3	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.4.7.1	Perform ~~CHANNEL CHECK~~ of required drywell floor drain sump monitoring system.	12 hours
SR 3.4.7.~~1~~2	Perform CHANNEL CHECK of required ~~primary containment~~ drywell atmospheric monitoring system.	12 hours
SR 3.4.7.3	~~Perform CHANNEL CHECK of required primary containment air cooler condensate flow rate monitoring system.~~	~~12 hours~~
SR 3.4.7.~~6~~2	Perform CHANNEL FUNCTIONAL TEST of required ~~drywell floor drain sump monitoring system.~~ leakage detection instrumentation	31 days

(continued)

SURVEILLANCE REQUIREMENTS (continued)

	SURVEILLANCE	FREQUENCY
15	SR 3.4.7.5 Perform CHANNEL FUNCTIONAL TEST of required primary containment atmospheric monitoring system.	31 days
14	[SR 3.4.7.6 Perform CHANNEL FUNCTIONAL TEST of required primary containment air cooler condensate flow rate atmospheric monitoring system.	31 days]
15	SR 3.4.7.7 3 Perform CHANNEL CALIBRATION of required drywell floor drain sump monitoring system. leakage detection instrumentation (J)	[18] months
15	SR 3.4.7.8 Perform CHANNEL CALIBRATION of required primary containment atmospheric monitoring system.	[18] months
14	[SR 3.4.7.9 Perform CHANNEL CALIBRATION of required primary containment air cooler condensate flow rate monitoring system.	[18] months]

16

[For units with only 2 monitors required by the LCO, Required Action B.2 applies but neither Condition C nor Condition D apply, nor do SR 3.4.6.3, SR 3.4.6.6, and SR 3.4.6.9.

For units with 3 monitors required by the LCO, Required Action B.2 does not apply and Condition C and Condition D do apply, along with SR 3.4.6.3, SR 3.4.6.6, and SR 3.4.6.9.]

Current specs contain all current plant specific

Note: ... for all tech specs ... Make to ...

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