

UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

PHILADELPHIA ELECTRIC COMPANY

DOCKET NO. 50-352

LIMERICK GENERATING STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 105 License No. NPF-39

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Philadelphia Electric Company (the licensee) dated September 14, 1995, and supplemented by letter dated October 27, 1995, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

9511270278 951120 PDR ADOCK 05000352 P PDR Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-39 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 105, are hereby incorporated into this license. Philadelphia Electric Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

 This license amendment is effective as of its date of issuance, to be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

Jøhn F. Stolz, Director Project Directorate 1-2 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: November 20, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 105

FACILITY OPERATING LICENSE NO. NPF-39

DOCKET NO. 50-352

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change.

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DEFINITIONS

PURGE - PURGING

1.31 PURGE or PURGING shall be the controlled process of discharging air or gas from a confinement to maintain temperature, pressure, humidity, concentration or other operating condition, in such a manner that replacement air or gas is required to purify the confinement.

RATED THERMAL POWER

1.32 RATED THERMAL POWER shall be a total reactor core heat transfer rate to the reactor coolant of 3293 MWt.

REACTOR ENCLOSURE SECONDARY CONTAINMENT INTEGRITY 1.33 REACTOR ENCLOSURE SECONDARY CONTAINMENT INTEGRITY shall exist when:

- a. All reactor enclosure secondary containment penetrations required to be closed during accident conditions are either:
 - Capable of being closed by an OPERABLE secondary containment automatic isolation system, or
 - Closed by at least one manual valve, blind flange, slide gate damper, or deactivated automatic valve secured in its closed position, except as provided by Specification 3.6.5.2.1.
- All reactor enclosure secondary containment hatches and blowout panels are closed and sealed.
- c. The standby gas treatment system is in compliance with the requirements of Specification 3.6.5.3.
- d. The reactor enclosure recirculation system is in compliance with the requirements of Specification 3.6.5.4.
- e. At least one door in each access to the reactor enclosure secondary containment is closed.
- f. The sealing mechanism associated with each reactor enclosure secondary containment penetration, e.g., welds, bellows, or O-rings, is OPERABLE.
- g. The pressure within the reactor enclosure secondary containment is less than or equal to the value required by Specification 4.6.5.1.1a.

REACTOR PROTECTION SYSTEM RESPONSE TIME

1.34 REACTOR PROTECTION SYSTEM RESPONSE TIME shall be the time interval from when the monitored parameter exceeds its trip setpoint at the channe? sensor until de-energization of the scram pilot valve solenoids. The response time may be measured by any series of sequential, overlapping or total steps such that the entire response time is measured.

REFUELING FLOOR SECONDARY CONTAINMENT INTEGRITY

1.35 REFUELING FLOOR SECONDARY CONTAINMENT INTEGRITY shall exist when:

a. All refueling floor secondary containment penetrations required to be closed during accident conditions are either:

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DEFINITIONS

REFUELING FLOOR SECONDARY CONTAINMENT INTEGRITY (Continued)

- Capable of being closed by an OPERABLE secondary containment 1. automatic isolation system, or
- 2. Closed by at least one manual valve, blind flange, slide gate damper, or deactivated automatic valve secured in its closed position, except as provided by Specification 3.6.5.2.2.
- All refueling floor secondary containment hatches and blowout panels are b. closed and sealed.
- The standby gas treatment system is in compliance with the requirements c. of specification 3.6.5.3.
- d. At least one door in each access to the refueling floor secondary containment is closed.
- The sealing mechanism associated with each refueling floor secondary e. containment penetration, e.g., welds, beliows, or O-rings, is OPERABLE.
- f. The pressure within the refueling floor secondary containment is less than or equal to the value required by Specification 4.6.5.1.2a.

REPORTABLE EVENT

1.36 A REPORTABLE EVENT shall be any of those conditions specified in Section 50.73 to 10 CFR Part 50.

ROD DENSITY

1.37 ROD DENSITY shall be the number of control rod notches inserted as a fraction of the total number of control rod notches. All rods fully inserted is equivalent to 100% ROD DENSITY.

SHUTDOWN MARGIN

1.38 SHUTDOWN MARGIN shall be the amount of reactivity by which the reactor is subcritical or would be subcritical assuming all control rods are fully inserted except for the single control rod of highest reactivity worth which is assumed to be fully withdrawn and the reactor is in the shutdown condition; cold, i.e. 68°F; and xenon free.

SITE BOUNDARY

1.39 The SITE BOUNDARY shall be that line as defined in Figure 5.1.3-1a.

1.40 (Deleted)

SOURCE CHECK

1.41 A SOURCE CHECK shall be the qualitative assessment of channel response when the channel sensor is exposed to a radioactive source.

LIMERICK - UNIT 1

REACTOR ENCLOSURE SECONDARY CONTAINMENT AUTOMATIC ISOLATION VALVES

LIMITING CONDITION FOR OPERATION

3.6.5.2.1 The reactor enclosure secondary containment ventilation system automatic isolation valves shall be OPERABLE.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

ACTION:

with one or more of the reactor secondary containment ventilation system automatic isolation valves inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open and within 8 hours either:

- a. Restore the inoperable valves to OPERABLE status, or
- b. Isolate each affected penetration by use of at least one deactivated valve secured in the isolation position, or
- c. Isolate each affected penetration by use of at least one closed manual valve, blind flange or slide gate damper.

Otherwise, in OPERATIONAL CONDITION 1, 2, or 3, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

SURVEILLANCE REQUIREMENTS

4.6.5.2.1 Each reactor enclosure secondary containment ventilation system automatic isolation valve shall be demonstrated OPERABLE:

- a. Prior to returning the valve to service after maintenance, repair or replacement work is performed on the valve or its associated actuator, control or power circuit by cycling the valve through at least one complete cycle of full travel and verifying the specified isolation time.
- b. At least once per 24 months by verifying that on a containment isolation test signal each isolation valve actuates to its isolation position.
- c. By verifying the isolation time to be within its limit at least once per 92 days.

THE INFORMATION FROM THIS TECHNICAL SPECIFICATIONS SECTION HAS BEEN RELOCATED TO THE UFSAR.

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3/4 6-49 Amendment No. 23,105

REFUELING AREA SECONDARY CONTAINMENT AUTOMATIC ISOLATION VALVES

LIMITING CONDITION FOR OPERATION

3.6.5.2.2 The refueling area secondary containment ventilation system automatic isolation valves shall be OPERABLE.

APPLICABILITY: OPERATIONAL CONDITION *.

ACTION:

With one or more of the refueling area secondary containment ventilation system automatic isolation valves inoperable, maintain at least one isolation valve CPERABLE in each affected penetration that is open and within 8 hours either:

- a. Restore the inoperable valves to OPERABLE status, or
- b. Isolate each affected penetration by use of at least one deactivated valve secured in the isolation position, or
- c. Isolate each affected penetration by use of at least one closed manual valve, blind flange or slide gate damper.

Otherwise, in OPERATIONAL CONDITION*, suspend handling of irradiated fuel in the refueling area secondary containment, CORE ALTERATIONS and operations with a potential for draining the reactor vessel. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.6.5.2.2 Each refueling area secondary containment ventilation system automatic isolation valve shall be demonstrated OPERABLE:

- a. Prior to returning the valve to service after maintenance, repair or replacement work is performed on the valve or its associated actuator, control or power circuit by cycling the valve through at least one complete cycle of full travel and verifying the specified isolation time.
- b. At least once per 24 months by verifying that on a containment isolation test signal each isolation valve actuates to its isolation position.
- c. By verifying the isolation time to be within its limit at least once per 92 days.

^{*}Required when (1) irradiated fuel is being handled in the refueling area secondary containment, or (2) during CORE ALTERATIONS, or (3) during operations with a potential for draining the reactor vessel with the vessel head removed and fuel in the vessel.

THE INFORMATION FROM THIS TECHNICAL SPECIFICATIONS SECTION HAS BEEN RELOCATED TO THE UFSAR. 1.24

THE INFORMATION FROM THIS TECHNICAL SPECIFICATIONS SECTION HAS BEEN RELOCATED TO THE UFSAR.

Amendment No. 23,105

BASES

3/4.6.5 SECONDARY CONTAINMENT (Continued)

The field tests for bypass leakage across the SGTS charcoal adsorber and HEPA filter banks are performed at a flow rate of $3000 \pm 10\%$ cfm. This flow rate corresponds to the maximum overall three zone inleakage rate of 3264 cfm.

The SGTS filter train pressure drop is a function of air flow rate and filter conditions. Surveillance testing is performed using either the SGTS or drywell purge fans to provide operating convenience.

Each reactor enclosure secondary containment zone and refueling area secondary containment zone is tested independently to verify the design leak tightness. A design leak tightness of 1250 cfm or less for each reactor enclosure and 764 cfm or less for the refueling area at a 0.25 inch of vacuum water gage will ensure that containment integrity is maintained at an acceptable level if all zones are connected to the SGTS at the same time.

The Reactor Enclosure Secondary Containment Automatic Isolation Valves and Refueling Area Secondary Containment Automatic Isolation Valves can be found in the UFSAR.

The post-LOCA offsite dose analysis assumes a reactor enclosure secondary containment post-draw down leakage rate of 1250 cfm and certain post-accident X/Q values. While the post-accident X/Q values represent a statistical interpretation of historical meteorological data, the highest ground level wind speed which can be associated with these values is 7 mph (Pasquill-Gifford stability Class G for a ground level release). Therefore, the surveillance requirement assures that the reactor enclosure secondary containment is verified under meteorological conditions consistent with the assumptions utilized in the design basis analysis. Reactor Enclosure Secondary Containment leakage tests that are successfully performed at wind speeds in excess of 7 mph would also satisfy the leak rate surveillance requirements, since it shows compliance with more conservative test conditions.

3/4.6.6 PRIMARY CONTAINMENT ATMOSPHERE CONTROL

The OPERABILITY of the systems required for the detection and control of hydrogen combustible mixtures of hydrogen and oxygen ensures that these systems will be available to maintain the hydrogen concentration within the primary containment below the lower flammability limit during post-LOCA conditions. The primary containment hydrogen recombiner is provided to maintain the oxygen concentration below the lower flammability limit. The combustible gas analyzer is provided to continuously monitor, both during normal operations and post-LOCA, the hydrogen and oxygen concentrations in the primary containment. The primary containment atmospheric mixing system is provided to ensure adequate mixing of the containment atmosphere to prevent localized accumulations of hydrogen and oxygen from exceeding the lower flammability limit. The hydrogen control system is consistent with the recommendations of Regulatory Guide 1.7, "Control of Combustible Gas Concentrations in Containment Following a LOCA," March 1971.

LIMERICK - UNIT 1

Amendment No. \$,105



UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

PHILADELPHIA ELECTRIC COMPANY

DOCKET NO. 50-353

LIMERICK GENERATING STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 69 License No. NPF-85

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Philadelphia Electric Company (the licensee) dated September 14, 1995, and supplemented by letter dated October 27, 1995, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I:
 - Β. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission:
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

 Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-85 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 69, are hereby incorporated into this license. Philadelphia Electric Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance, to be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

John F. Stolz, Director Project Directorate I-2 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Attachment: Character to the lechnical Specifications

Date of Issuance: November 20, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 69

FACILITY OPERATING LICENSE NO. NPF-85

DOCKET NO. 50-353

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change.

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1-7	1-7
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LIMERICK - UNIT 2

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DEFINITIONS

PURGE - PURGING

1.31 PURGE or PURGING shall be the controlled process of discharging air or gas from a confinement to maintain temperature, pressure, humidity, concentration or other operating condition, in such a manner that replacement air or gas is required to purify the confinement.

RATED THERMAL POWER

1.32 RATED THERMAL POWER shall be a total reactor core heat transfer rate to the reactor coolant of 3458 MWt.

REACTOR ENCLOSURE SECONDARY CONTAINMENT INTEGRITY 1.33 REACTOR ENCLOSURE SECONDARY CONTAINMENT INTEGRITY shall exist when:

- a. All reactor enclosure secondary containment penetrations required to be closed during accident conditions are either: :
 - 1. Capable of being closed by an OPERABLE secondary containment automatic isolation system, or
 - Closed by at least one manual valve, blind flange, slide gate damper or deactivated automatic valve secured in its closed position, except as provided by Specification 3.6.5.2.1.
- All reactor enclosure secondary containment hatches and blowout panels are closed and sealed.
- c. The standby gas treatment system is in compliance with the requirements of Specification 3.6.5.3.
- d. The reactor enclosure recirculation system is in compliance with the requirements of Specification 3.6.5.4.
- e. At least one door in each access to the reactor enclosure secondary containment is closed.
- f. The sealing mechanism associated with each reactor enclosure secondary containment penetration, e.g., welds, bellows, or O-rings, is OPERABLE.
- g. The pressure within the reactor enclosure secondary containment is less than or equal to the value required by Specification 4.6.5.1.1a.

REACTOR PROTECTION SYSTEM RESPONSE TIME

1.34 REACTOR PROTECTION SYSTEM RESPONSE TIME shall be the time interval from when the monitored parameter exceeds its trip setpoint at the channel sensor until de-energization of the scram pilot valve solenoids. The response time may be measured by any series of sequential, overlapping or total steps such that the entire response time is measured.

REFUELING FLOOR SECONDARY CONTAINMENT INTEGRITY 1.35 REFUELING FLOOR SECONDARY CONTAINMENT INTEGRITY shall exist when:

a. All refueling floor secondary containment penetrations required to be closed during accident conditions are either:

LIMERICK - UNIT 2

DEFINITIONS

REFUELING FLOOR SECONDARY CONTAINMENT INTEGRITY (Continued)

- 1. Capable of being closed by an OPERABLE secondary containment automatic isolation system, or
- Closed by at least one manual valve, blind flange, slide gate damper or deactivated automatic valve secured in its closed position, except as provided by Specification 3.6.5.2.2.
- All refueling floor secondary containment hatches and blowout panels are closed and sealed.
- c. The standby gas treatment system is in compliance with the requirements of Specification 3.6.5.3.
- At least one door in each access to the refueling floor secondary containment is closed.
- e. The sealing mechanism associated with each refueling floor secondary containment penetration, e.g., welds, bellows, or O-rings, is OPERABLE.
- f. The pressure within the refueling floor secondary containment is less than or equal to the value required by Specification 4.6.5.1.2a.

REPORTABLE EVENT

1.36 A REPORTABLE EVENT shall be any of those conditions specified in Section 50.73 to 10 CFR Part 50.

ROD DENSITY

1.37 ROD DENSITY shall be the number of control rod notches inserted as a fraction of the total number of control rod notches. All rods fully inserted is equivalent to 100% ROD DENSITY.

SHUTDOWN MARGIN

1.38 SHUTDOWN MARGIN shall be the amount of reactivity by which the reactor is subcritical or would be subcritical assuming all control rods are fully inserted except for the single control rod of highest reactivity worth which is assumed to be fully withdrawn and the reactor is in the shutdown condition; cold, i.e. 68°F; and xenon free.

SITE BOUNDARY

- 1.39 The SITE BOUNDARY shall be that line as defined in Figure 5.1.3-1a.
- 1.40 (Deleted)

SOURCE CHECK

1.41 A SOURCE CHECK shall be the qualitative assessment of channel response when the channel sensor is exposed to a radioactive source.

LIMERICK - UNIT 2

REACTOR ENCLOSURE SECONDARY CONTAINMENT AUTOMATIC ISOLATION VALVES

LIMITING CONDITION FOR OPERATION

3.6.5.2.1 The reactor enclosure secondary containment ventilation system automatic isolation valves shall be OPERABLE.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

ACTION:

With one or more of the reactor secondary containment ventilation system automatic isolation valves inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open and within 8 hours either:

- a. Restore the inoperable valves to OPERABLE status, or
- b. Isolate each affected penetration by use of at least one deactivated valve secured in the isolation position, or
- c. Isolate each affected penetration by use of at least one closed manual valve, blind flange or slide gate damper.

Otherwise, in OPERATIONAL CONDITION 1, 2, or 3, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

SURVEILLANCE REQUIREMENTS

4.6.5.2.1 Each reactor enclosure secondary containment ventilation system automatic isolation valve shall be demonstrated OPERABLE:

- a. Prior to returning the valve to service after maintenance, repair or replacement work is performed on the valve or its associated actuator, control or power circuit by cycling the valve through at least one complete cycle of full travel and verifying the specified isolation time.
- b. At least once per 24 months by verifying that on a containment isolation test signal each isolation valve actuates to its isolation position.
- c. By verifying the isolation time to be within its limit at least once per 92 days.

THE INFORMATION FROM THIS TECHNICAL SPECIFICATIONS SECTION HAS BEEN RELOCATED TO THE UFSAR.

REFUELING ARE: SECONDARY CONTAINMENT AUTOMATIC ISOLATION VALVES

LIMITING CONDITION FOR OPERATION

3.6.5.2.2 The refueling area secondary containment ventilation system automatic isolation valves shall be OPERABLE.

APPLICABILITY: OPERATIONAL CONDITION *.

ACTION:

With one or more of the refueling area secondary containment ventilation system automatic isolation valves inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open and within 8 hours either:

- a. Restore the inoperable valves to OPERABLE status, or
- b. Isolate each affected penetration by use of at least one deactivated valve secured in the isolation position, or
- c. Isolate each affected penetration by use of at least one closed manual valve, blind flange or slide gate damper.

Otherwise, in OPERATIONAL CONDITION*, suspend handling of irradiated fuel in the refueling area secondary containment, CORE ALTERATIONS and operations with a potential for draining the reactor vessel. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.6.5.2.2 Each refueling area secondary containment ventilation system automatic isolation valve shall be demonstrated OPERABLE:

- a. Prior to returning the valve to service after maintenance, repair or replacement work is performed on the valve or its associated actuator, control or power circuit by cycling the valve through at least one complete cycle of full travel and verifying the specified isolation time.
- b. At least once per 24 months by verifying that on a containment isolation test signal each isolation valve actuates to its isolation position.
- c. By verifying the isolation time to be within its limit at least once per 92 days.

*Required when (1) irradiated fuel is being handled in the refueling area secondary containment, or (2) during CORE ALTERATIONS, or (3) during operations with a potential for draining the reactor vessel with the vessel head removed and fuel in the vessel.

THE INFORMATION FROM THIS TECHNICAL SPECIFICATIONS SECTION HAS BEEN RELOCATED TO THE UFSAR.

LIMERICK - UNIT 2

Amendment No. 69

THE INFORMATION FROM THIS TECHNICAL SPECIFICATIONS SECTION HAS BEEN RELOCATED TO THE UFSAR.

LIMERICK - UNIT 2

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3/4 6-51a Amendment No. 69

1.

BASES

SECONDARY CONTAINMENT (Continued)

The SGTS fans are sized for three zones and therefore, when aligned to a single zone or two zones, will have excess capacity to more quickly drawdown the affected zones. There is no maximum flow limit to individual zones or pairs of zones and the air balance and drawdown time are verified when all three zones are connected to the SGTS.

The three zone air balance verification and drawdown test will be done after any major system alteration, which is any modification which will have an effect on the SGTS flowrate such that the ability of the SGTS to drawdown the reactor enclosure to greater than or equal to 0.25 inch of vacuum water gage in less than or equal to 126 seconds could be affected.

The field tests for bypass leakage across the SGTS charcoal adsorber and HEPA filter banks are performed at a flow rate of $3000 \pm 10\%$ cfm. This flow rate corresponds to the maximum overall three zone inleakage rate of 3264 cfm.

The SGTS filter train pressure drop is a function of air flow rate and filter conditions. Surveillance testing is performed using either the SGTS or drywell purge fans to provide operating convenience.

Each reactor enclosure secondary containment zone and refueling area secondary containment zone is tested independently to verify the design leak tightness. A design leak tightness of 1250 cfm or less for each reactor enclosure and 764 cfm or less for the refueling area at a 0.25 inch of vacuum water gage will ensure that containment integrity is maintained at an acceptable level if all zones are connected to the SGTS at the same time.

The Reactor Enclosure Secondary Containment Automatic Isolation Valves and Refueling Area Secondary Containment Automatic Isolation Valves can be found in the UFSAR.

The post-LOCA offsite dose analysis assumes a reactor enclosure secondary containment post-draw down leakage rate of 1250 cfm and certain post-accident X/Q values. While the post-accident X/Q values represent a statistical interpretation of historical meteorological data, the highest ground level wind speed which can be associated with these values is 7 mph (Pasquill-Gifford stability Class G for a ground level release). Therefore, the surveillance requirement assures that the reactor enclosure secondary containment is verified under meteorological conditions consistent with the assumptions utilized in the design basis analysis. Reactor Enclosure Secondary Containment leakage tests that are successfully performed at wind speeds in excess of 7 mph would also satisfy the leak rate surveillance requirements, since it shows compliance with more conservative test conditions.