REFUELING OPERATIONS

3/4.9.4 CONTAINMENT BUILDING PENETRATIONS

LIMITING CONDITION FOR OPERATION

3.9.4 The containment building penetrations shall be in the following status:

a. The equipment door closed and held in place by a minimum of four bolts,

b. ~~A minimum of one door in each airlock is closed*~~, and INSERT "A"

c. Each penetration providing direct access from the containment atmosphere to the outside atmosphere shall be either:

1) Closed by an isolation valve, blind flange, or manual valve, or approved functional equivalent, or

2) Be capable of being closed by an OPERABLE automatic containment purge isolation valve.

APPLICABILITY: During CORE ALTERATIONS or movement of irradiated fuel within the containment.

ACTION:

With the requirements of the above specification not satisfied, immediately suspend all operations involving CORE ALTERATIONS or movement of irradiated fuel in the containment building.

SURVEILLANCE REQUIREMENTS

4.9.4 Each of the above required (required) containment building penetrations shall be determined to be either in its ~~closed/isolated~~ condition or capable of being closed by an OPERABLE automatic containment purge isolation valve within 100 hours prior to the start of and at least once per 7 days during CORE ALTERATIONS or movement of irradiated fuel in the containment building by:

a. Verifying the penetrations are in their ~~closed/isolated~~ (required) condition, or

b. Testing the containment purge isolation valves per the applicable portions of Specification 4.6.3.2.

*An emergency escape hatch temporary closure device is an acceptable replacement for the airlock door.

INSERT "A"

A minimum of one door in the emergency airlock is closed* and one door in the personnel airlock is capable of being closed, and

3/4.9 REFUELING OPERATIONS

BASES

3/4.9.1 BORON CONCENTRATION

The limitations on reactivity conditions during REFUELING ensure that: (1) the reactor will remain subcritical during CORE ALTERATIONS, and (2) a uniform boron concentration is maintained for reactivity control in the water volume having direct access to the reactor vessel. The limitation on K_{eff} of no greater than 0.95 is sufficient to prevent reactor criticality during refueling operations. The locking closed of the required valves during refueling operations precludes the possibility of uncontrolled boron dilution of the filled portions of the Reactor Coolant System. This action prevents flow to the RCS of unborated water by closing flow paths from sources of unborated water. These limitations are consistent with the initial conditions assumed for the boron dilution incident in the safety analyses.

3/4.9.2 INSTRUMENTATION

The OPERABILITY of the Source Range Neutron Flux Monitors ensures that redundant monitoring capability is available to detect changes in the reactivity condition of the core.

When determining compliance with action statement requirements, addition to the RCS of borated water with a concentration greater than or equal to the minimum required RWST concentration shall not be considered to be a positive reactivity change.

3/4.9.3 DECAY TIME

The minimum requirement for reactor subcriticality prior to movement of irradiated fuel assemblies in the reactor vessel ensures that sufficient time has elapsed to allow the radioactive decay of the short-lived fission products. This decay time is consistent with the assumptions used in the safety analyses.

3/4.9.4 CONTAINMENT BUILDING PENETRATIONS

The requirements on containment building penetration closure and OPERABILITY ensure that a release of radioactive material ~~within~~ **from** containment will be **minimized**. ~~restricted from leakage to the environment~~. The OPERABILITY and closure restrictions are sufficient to restrict radioactive material release from a fuel element rupture based upon the lack of containment pressurization potential while in the REFUELING MODE.

INSERT "B"

The OPERABILITY of this system ensures the containment purge penetrations will be automatically isolated upon detection of high radiation levels within containment. The OPERABILITY of this system is required to restrict the release of radioactive materials from the containment atmosphere to the environment.

Equivalent isolation methods for the emergency personnel escape lock and containment wall penetrations ensure releases from containment are prevented for credible accident scenarios. The isolation techniques must be approved by an engineering evaluation and may include use of a material that can provide a temporary, pressure tight seal capable of maintaining the integrity of the penetrations and airlock to restrict the release of radioactive material from a fuel element rupture.

INSERT "B"

Both containment personnel airlock doors may be open during movement of irradiated fuel or CORE ALTERATIONS, provided one airlock door is capable of being closed and the water level in the refueling pool is maintained as required.