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August 28, 1984

Director of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission 7920 Norfolk Avenue Bethesda, Maryland 20814

Attention: Mr. Albert Schwencer, Chief Licensing Branch 2 Division of Licensing

Gentlemen:

HOPE CREEK GENERATING STATION DOCKET NO. 50-354 CONTAINMENT ISOLATION

Pursuant to discussions with L. Ruth, Containment Systems Branch, on July 2 and 12, 1984, FSAR Sections 1.10 and 6.2, Tables 1.11-1, 6.2-16 and 6.2-25, Figures 5.4-8, 6.2-28 and 6.2-45, and Question 480.14 have been revised and are attached for your use. These changes will be incorporated into Amendment 8.

RL Mittl/DEC

JES:gs Attachment

C D. H. Wagner USNRC Licensing Program Manager

W. H. Bateman USNRC Senior Resident Inspector

120.1

Response

Essential systems are those critical to the immediate mitigation of the consequences of a LOCA. Also identified as essential are those systems that could be useful, although not critical, in mitigating an accident that results in containment isolation. Essential systems are not automatically isolated by accident signals.

Monessential systems are those that are not required or used in the mitigation of an accident that results in containment isolation. All nonessential systems are automatically isolated by the containment isolation signal, and cannot be reopened by the operator while the accident signal is still present. Insert A

Essential and nonessential systems are identified in Table 6.2-16.

Diverse parameters are sensed for the initiation of automatic isolation of nonessential systems penetrating primary containment. See Section 6.2.4 for a discussion of containment isolation signal sensed parameter diversity.

As required for post-accident situations, each nonessential penetration, except instrument lines, has two isolation barriers in series that meet the requirements of GDC 54, 55, 56, or 57, as clarified by SRP Section 6.2.4. Isolation is automatic with no credit taken for operator action. All manual valves are sealed closed so as to qualify as an isolation barrier. Each automatic isolation valve in a nonessential penetration receives independent isolation signals, derived from diverse parameters.

The design of the controls for automatic containment isolation are such that the resetting of the isolation signals will not result in the automatic reopening of containment isolation valves. Reopening of containment isolation valves will require deliberate operator action on a valve-by-valve basis. Ganged reopening of containment isolation valves is not used. Isolation valves in the RHR process sampling line, reactor water sample line, HPCI and RCIC suction and steam supply line, and the TIP system ball valve are being modified to reflect this criteria. These modifications will be incorporated into the HCGS design prior to fuel load

The primary containent isolation logic setpoint pressure is 2.0 psig. This pressure is far enough above the maximum expected pressure inside containment during normal operation that inadvertent containment isolation does not occur during normal operation from instrument drift fluctuations due to the accuracy of the pressure sensor.

with the exception of the systems discussed below:

- a. Reacher Water Clanup (Ruci) system Return
 Automatic isolation of Value AE-VOZI (AE-HV-FO38)

 is not provided because there are two

 chack values at the containment boundary providing primary containment isolation for the freelieter system. These values will provide immediate isolation without actuation of the motor-operated value by an isolation signal. Value AE-VOZI is a motor-operated check value that closes on back flow and is capable of being manually closed from the main control room.
- b. By pass Lines Around the Testable Check Values

 On the RHR and Core Spray Systems The

 values in the tinch by pass lines are not

 automatically isolated because they are

 normally closed, fail closed values, that are

 only operated to egualize pressures to permit

 e testing of the check values. The values are opened

 by an operator holding a momentary push button

 Switch in the open position. Relieve of the

switch by the operator will return the valves to the closed position.

e. Winnup Lines Around the Inboard HPCI and RCK steam Line Isolation Valves - Whenatic isolation of these valves is not provided because they are in essential systems and are not required to perform a containment isolation function when the RCK and HPCI systems are in operation.

Non-Condensible Gas Vent from the RHR Lleat ExhingerThe valves on the vent line between the RHR
heat exchangers and the suppression chamber
(BC-HV-F104A,8 and KHV-F105A,8) are not autometically
isolated because they are normally closed
and are only opened during the RHR steam
condensing mode of operation. The rent lines
connect the RHR heat exchanger to the suppression
pool. The RHR heat exchanger is part of an
ECCS system and immediate isolation is not
required if the valves were open at the time of
requirement to isolate containment.

Reopening of primary containment isolation valves requires deliberate operator action on a live by- valve basis Valves with manual overribe capabilities are identified in Table 6.2-16.

TABLE 1.11-1 (cont)

Summary

Pags 13 of 28

FBAR Section (8)

SEP _Section_	Specific SRP Acceptance Criteria	Description of Differences	Discussed
6.2.3	11.).•		6.2.3.6
(Rev 2)	The external design pressure of the secondary containment structure should provide an adequate margin above the maximum expected external pressure.	The secondary containment for tornado depressurisation is not designed with any margin above the maxicum expected external pressure as stated in Regulatory Guide 1.76.	
	1 11.6.9		6.2.4.5
(Rev 2)	Relief valves used as isola- tion valves should have a relief setpoint greater than 1.5 times the containment design pressure.	Relief valve setpoint is not greater than 1.5 times the containment design pressure.	
	Valve nearest the containment and piping between the containment and the first valve when both valves are located outside primary containment, should be enclosed in a leaktight or controlled leakage housing.	An enclosure or leak-tight housing has not been designed.	6.2.4.5
Insert B _			6.2.5.7
6.2.5 (Rev 2)	Following a LOCA, repressuri- zation of the containment should be limited to less than 50% of containment design pressure.	Pressure increase due to main steam isolation valve (MSIV) inleakage after a LOCA will result in repressurization of more than 50% of the containment design pressure.	
	11		6.5.1.2
6.5.1 (Rev 2)	Design of instrumentation for ESF atmosphere cleanup system to the guidelines of Regularo Guide 1.52 and to the recom- mendations of ANSI N509 as summaried in SRP Table 6.5.1-	for the CREF system are discussed in Table 6.5-4 and for the FRVS systems in	
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water seal for at least 30 days. The ECCS and RCIC jockey pumps can be used to maintain pressure and to provide makeup or to fill up the feedwater system piping in the unlikely event that a line break occurs downstream of the check valves inside the primary containment it is necessary.

- b. Deleted
- c. High pressure coolant injection (HPCI) turbine steam supply - The drain pot line is maintained full of water by condensation on the turbine steam supply line.
- d. Chilled water from and to drywell coolers The lines in the reactor building are seismically analyzed with a vertical rise from the containment penetration of approximately 8 feet.
- e. RWCU supply The lines in the primary containment are Seismic Category I and form a loop whose vertical leg is approximately 49 feet.
- f. RCIC turbine steam supply This is similar to b.
- g. Main steam line drain The line to the isolation valve is Seismic Category I. Steam would condense in the line and form a water seal during normal operation. Closure of the inboard and outboard isolation valves upon receipt of a containment isolation signal and the water seal provide a barrier to bypass leakage.
- h. Drywell floor drain and drywell equipment drain sump discharges - The lines to the isolation valves are Seismic Category I, and the sump water acts as an effective water seal.
- Reactor auxiliaries coolant system (RACS) supply and return - There are seismically analyzed lines in the auxiliary building, with a vertical leg approximately 6-feet long that forms a water seal.
- j. Deleted

in addition to the third isolation valve, there are isolation valves on the high pressure coolant injection (HPCI) and reactor core isolation cooling (RCIC) discharge lines, and on the reactor water cleanup system (RWCU) return lines that connect to the water cleanup system the outside containment isolation valves feedwater lines between the outside containment isolation valves and the third isolation valves. Those isolation valves can be closed by operator action from the main control room.

See Section 5.4.9 for a further discussion of the design of the main steam lines and the feedwater lines.

6.2.4.3.1.3 Residual Heat Removal Shutdown Cooling Suction Line

The residual heat removal (RHR) shutdown cooling suction line penetrates primary containment and taps into one of the two recirculation loops. Isolation is provided by two normally closed motor-operated game valves, which are maintained closed by a containment isolation signal. One containment isolation valve is located inside primary containment, and the second valve is located outside primary containment. This design is conservative ince it does not take credit for the RHR system being a closed system outside primary containment.

6.2.4.3.1.4 Residual Heat Removal Shutdown Cooling Return Lines

The RHR shutdown cooling return lines penetrate the primary are connected to containment and discharge into the discharge side of each recirculation loop, which injects directly into the RPV. Each line is isolated by a single, normally closed, motor-operated primary containment isolation valve that receives a containment isolation signal. Outside primary Containment and by a testable check value inside Primary containment. The motor operated was of a single containment isolation valve is justified on the basis that the RHR system meets the requirements of a closed system outside primary containment. The RHR system is maintained system outside primary containment. The RHR system is maintained in a leak-tight condition during normal operation by the use of a jockey pump system and by pump room flooding alarms and periodic visual inspection.

signal during normal operation and are maintained closed during an accident by a low water level isolation signal.

Each testable check valve is proved with a bypas line for testing purposes. These lines are isolated by as air operated globe valve.

6.2.4.3.1.5 Residual Heat Removal Low Pressure Coolant Injection and Core Spray Discharge Lines

The RHR low pressure coolant injection (LPCI) and the tore spray discharge lines penetrate the primary containment and discharge directly into the RPV. Each line is isolated by a single, outside primary normally closed, motor-operated containment isolation valve that does not receive a containment disolation signal. and a totable check valve inside primary containment.

Use of a single containment isolation valve is justified on the basis that both RHR and core spray meet the requirements of a closed system outside of primary containment. Automatic isolation is not provided because greater safety is ensured by initiating a cooling water supply to the reactors.

In addition, there is a HPCI line which discharges into the RPV
by way of one of the two core spray lines downstream of the
containment isolation valve on that core spray line. This line
is isolated by a normally closed motor-operated gate valve. Use containment
of a single isolation valve is again justified on the basis that
the HPCI system is a closed system outside primary containment.
Automatic isolation is not provided because greater safety is
ensured by initiating a cooling water supply to the reactor.
This motor operated valve, in series with the totable check valve
on the core spray line, provides the second redundant isolation before
6.2.4.3.1.6 High Pressure Coolant Injection and Reactor Core
Isolation Cooling Steam Supply Lines

The high pressure coolant injection (HPCI) and reactor core isolation cooling (RCIC) steam supply lines have two major containment isolation valves in series that are normally open, located inside and outside of the primary containment. The third containment isolation valve on these lines is a 2-inch, normally closed globe valve, on a 1-inch bypass line around the inside major containment isolation valve. These valves do not receive a containment isolation signal when a LOCA is detected. This permits these ESF systems to function during a LOCA. However, these valves automatically close when a break is detected in the portion of the steam supply line outside primary containment of the respective system.

6.2.4.3.1.7 Reactor Water Cleanup System Line

Reactor water processed through the RWCU system is taken out of containment from the reactor recirculation loops. The RWCU line Seach testable check valve is provided with a bypass line for testing purposes. These lines are isolated by an air-operated, fail-closed, globe valve.

6.2-47

outside primary containment that closes on a containment isolation signal.

6.2.4.3.1.13 Post-Accident Liquid Sampling System

There are seven post-accident sampling lines that penetrate the primary containment. Only one of the seven forms part of the RCPB as well. See Section 6.2.4.3.2.16 for a discussion of the containment isolation provisions for these lines.

6.2.4.3.1.14 Instrument Lines

The instrument lines that penetrate the primary containment and form part of the RCPB are designed to optimize their monitoring function and to minimize uncontrolled releases of radioactivity to the environment. These instrument lines have a flow restriction orifice inside the primary containment and an excess flow check valve outside the primary containment for automatic containment isolation in the event of an instrument line break. If an instrument line develops a leak of 1.5 to 2.5 gpm outside containment, the resultant differential pressure of 3 to 10 psi across the excess flow check valve will cause the check valve to close automatically. If an excess flow check valve fails to close when required, the restriction orifice and the main flow path through the valve have a resistance to flow at least equivalent to a sharp-edged orifice of 0.250 inches in diameter. Each valve is also provided with two limit switches that operate lights that indicate valve position and a solenoid valve for remote reset. The capability for remote operation has not been provided since there is no remote indication of failure of a specific line.

6.2.4.3.1.15 Conclusion on GDC 55

To ensure protection against the consequences of accidents involving the release of radioactive material, piping systems that form the RCPB are shown to have adequate isolation capabilities on a case-by-case basis. In all cases, a minimum of two barriers are shown to protect against the release of radioactive materials.

In addition to meeting the isolation requirements stated in GDC 55, the pressure-retaining components that comprise the RCPB are designed to meet other requirements that minimize the

be reliable boundaries against containment leakage, and that the system is maintained by visually checking for leaks during normal instrument calibrations.

The instrument lines that sense suppression pool water level have a remote manual valve for isolation. Their design is justified on the "other defined basis" because system reliability is greater with a single isolation valve and because these systems are closed systems outside containment that can accommodate a single failure without loss of system reliability as a boundary against containment leakage.

6.2.4.3.2.22 Conclusion on GDC 56

To ensure protection against the consequences of accidents involving release of significant amounts of radioactive materials, fluid lines that penetrate the primary containment have been demonstrated to provide isolation capabilities on a case-by-case basis in accordance with GDC 56.

In addition to meeting isolation requirements, the pressureretaining components of these systems are designed to the same quality standards as the containment.

- 6.2.4.3.3 Evaluation Against GDC 57
- 6.2.4.3.3.1 Chilled Water System Lines and Reactor Auxiliaries Cooling System Lines

The chilled water and the reactor auxiliaries cooling system (RACS) lines are closed systems inside primary containment. However, greater safety is achieved by meeting the requirements of GDC 56. Therefore, two redundant motor-operated isolation valves that isolate on a containment isolation signal, one inside and one outside primary containment, are provided.

6.243.115 Insert D

The CRD system has multiple, insert and withdraw lines, that penetrate the primary containment.

The classification of these lines is quality group B, and they are designed in accordance with ASME BAPV Code, Section III, Class 2. The basis upon which the CRD insert and withdraw lines are designed is commensurate with the safety importance of maintaining the pressure integrity of these lines.

It has been an accepted practice not to provide automatic isolation valves for the CRD insert and withdraw lines in order to preclude any possible failure of the scram function. The lines can be isolated by the solenoid valves provided on the hydraulic control units (HCUs) that are located outside the primary containment. The lines that extend outside the primary containment are 1 inch or smaller and terminate in systems that are designed to prevent outleakage. The solenoid valves are normally closed, but they open upon rod movement and during reactor scram. In addition, a ball check valve located in the CRD flange housing automatically seals the insert line if there is a break. Finally, manual shutoff valves are provided outside the primary containment.

6.2.4.3.2 Delete L 6.2.4.3.4 Evaluation Against Regulatory Guides

6.2.4.3.4.1 Evaluation Against Regulatory Guide 1.11 (Safety Guide 11)

Compliance with Regulatory Guide 1.11 (Safety Guide 11) is discussed in Section 1.8.11.

6.2.4.3.4.2 Evaluation Against Regulatory Guide 1.141

Compliance with Regulatory Guide 1.141 is discussed in action 1.8.1.141.

Regulatory Guide 1.141 is not a requirement for HCGS. However, our assessment is that the other defined bases for complying with GDC 54, 55, 56, and 57 that were implemented on HCGS meet Regulatory Guide 1.141 requirements.

6.2.4.3.4.3 Failure Mode and Effects Analyses

A single failure can be defined as a failure of a component in any safety system that results in a loss or reduction of the

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He Because of the unique function and features of the CRD system, the previously described design constitutes an acceptable other defined basis for containment isolation as recognized by the URC in the Federal Register (48 FR 23809).

system's capability to perform its safety function. Active mechanical components are defined in Regulatory Guide 1.48 as components that must perform a mechanical motion during the course of accomplishing a system safety function. Appendix A to 10 CRF 50 requires that electrical systems be designed against passive single failures as well as active single failures. Sections 3.1 and 15.9 describe the implementation of these requirements as well as the requirements of GDC 17, 21, 35, 41, 44, 54, 55, 56, and 57.

6.2.4.3.5 Evaluation of Other Defined Bases

When the reliability of an ESF system is increased by using only one containment isolation valve, a closed system outside primary containment is used as a second isolation barrier to accommodate a single active failure. In the case of a single failure, the closed system accommodates the failure by being an extention of es the containment. Table 6.2-20 identifies those penetrations isolated with only a single isolation valve. Figures 6.2-45, 6.2-46, 6.2-47, and 6.2-48 show the limits of the extended containment boundary. All manual valves at the system boundary, ent valves, test valves, and drain valves, areaunder administrative control to assure the integrity of the extended containment boundary. Isolation provisions for the extended containment boundaries are identified in Table 6.2-27. Table 6.2-21so evaluates the ability of check valves and safety/relief valves to maintain the extended containment boundary. All extended containment boundaries are Quality Group B (i.e. ASME BaPV Code Class 2 piping), Seismic Category I, and designed to temperature and pressure ratings at least equal to that of the containment as identified in Figures 6.2-45 through 6.2-48.

closed

Missile protection for plant systems and structures is discussed in Section 3.5.

6.2.4.3.5.1 Conclusion on Other Defined Bases

When greater safety is ensured by using a single primary containment isolation valve, a dependable closed system outside primary containment is provided to act as a second barrier against the release of radioactive materials.

setpoint is greater than 1.5 times the containment design pressure.

For relief valve PSV-F097, shown on Figure 5.4-13, the relief setpoint is less than 1.5 times the containment design pressure. Nevertheless, this is acceptable since valve F097 discharges into the suppression pool. Any increase in valve backpressure due to an increase in suppression chamber pressure resulting from an accident will tend to better seat the valve, thus enhancing its containment isolation capabilities.

Insert C

6.2.5 COMBUSTIBLE GAS CONTROL IN CONTAINMENT

Following a postulated loss-of-coolant accident (LOCA), hydrogen gas may be generated within the primary containment as a result of the following processes:

- Metal-water reaction involving the Zircaloy fuel cladding and the reactor coolant
- Radiolytic decomposition of water in the reactor vessel and the suppression pool (oxygen also evolves in this process)
- c. Corrosion of metals and paints in the primary containment.

To preclude the possibility of a combustible mixture of hydrogen and oxygen accumulating in the primary containment, the containment atmosphere is inerted with nitrogen gas before power operation of the reactor.

To ensure that the hydrogen and oxygen concentration in the primary containment is maintained below the lower flammability limit given in Regulatory Guide 1.7, the following features are provided:

- a. A containment hydrogen recombiner system
- A hydrogen/oxygen analyzer system (HOAS).

Insert C 6.2.4.5.3 Acceptance Criterion II.6.h

Acceptance Criterion IIG. h of Saction 6.2.4 Myores that nonessential systems be automatically isolated by the containment isolation signal. HUGS complies with this requirement, with the exceptions that are identified and justified in our response to NUREG-0737, Item II. E.4.2 in Section 1.10.

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TABLE 6.2-16

(1) Valve type:

Ball	BL.
Butterfly	BF
Check valve	CX
	GT
Gate valve	68
Globe	
Pressure relief	, PSV
Stop check	SCK
Safety relief	SRY
Explosive (shear)	XP
	XV
Excess flow check	ELC!
Ball check	
Hydralic control unit	HCU
Restriction orifice .	FO

- (2) See Figure 6.2-28. Numbers in this column refer to details in the figure.
- (3) AC-operated valves required for isolation functions are powered from the AC standby power buses. DC-operated isolation valves are powered from the station batteries.
- (4) Normal valve position (open or closed) is the position during normal power operation of the reactor.
- . (5) Table of isolation signal codes:
 - A Reactor Vessel Low Water Level L2
 - 8 Main Steam Line High Radiation
 - C- Not used
 - D Main Steam Line High Flow
 - E Main Turbine Inlet Low Steam Pressure (Run Mode)
 - F Main Condenser Low Vacuum (Main Stop Valve Greater than 90% Open)
 - G Main Steam Line Tunnel High Temperature
 - H Drywell High Pressure
 - I Reactor Building High Radiation
 - J Reactor Vessel Low Water Level L3
 - K Reactor Vessel Low Water Level L1
 - L Reactor Water Cleanup System Area High Temperature in the system's equipment compartment
 - M Reactor Water Cleanup System Area High Differential Temperature across the system's equipment compartment
 - ventilation duc's
 N Reactor Water Cleanup System High Differential Flow between
 the system influent and effluent piping outside the drywell
 - 0 Standby Liquid Control System Operating
 - P Reactor Water Cleanup High Temperature at Outlet of Nonregenerative Heat Exchanger



TABLE 6.2-16 (Cont'd)

(%) Power source:

channels

Electrical Separation Source:

- A Class 1E electrical channel
- B Class IE electrical channel
- C Class 1E electrical channel
- D Class 1E electrical channel
- W Reactor protection system (RPS) electrical separation channel
- X RPS electrical separation channel
- Y RPS electrical separation channel
- Z RPS electrical separation channel
- N Non-Class 1E

For explanation of electrical separation channels, refer to Section 8.1.

(7) Remarks:

- a. Main steam isolation valves requires that both solenoid pilots be deenergized to close valves. Accumulator air pressure plus spring act together to close valves when both pilots are deenergized. Voltage failures at only one pilot does not cause valve closure. The valves are designed to fully close in less than 10 seconds, but in no less than 3 seconds.
- b. A separate pressure interlock closes the valves upon high reactor pressure.
- c. Separate HPCI system isolation provisions isolate these valves on exhaust pressure high, area temperature high, steam pressure low, and steam flow high.
- d. Separate RCIC system isolation provisions isolate these valves on exhaust pressure high, area temperature high, steam pressure low, and steam flow high.
 - e. Valves FD voot and FD volo isolate on HPCI system steam line pressure high. low and drywell pressure high.
 - f. Valve closes on HPCI system exhaust pressure high, area temperature high, steam pressure low, and steam flow high.

 Value closes on RCIC system steam line pressure low and drywell pressure high.

Page 30 of 32

TABLE 6.2-16 (Cont'd)

g. Valver close on HPCI system high discharge flow.

h. Valve closes on RCIC system high discharge flow.

Valves bc-vo31, vo34, v128, and v131 closes on RHR system high discharge flow.

Valves BE 1036, 1036 close on core spray system high discharge

- This penetration is a boundary between the drywell and the suppression chamber. It is not a path from the primary containment to the environment.
- Deleted This penetration is classified as an ESF penetration since it is used by the containment hydrogen recombiner system.
- Sealed penetration
- Relief valve set pressure 410 psig
- Relief valve set pressure 68 psig
- Relief valve set pressure 495 psig
- Relief valve set pressure 500 psig
- Locked closed valve
- System defined as essential per the definition in HCGS' response to NUREG-0737, Item II.E.4.2
- System defined as nonessential per the definition in HCGS' response to NUREG-0737, Item II.E.4.2 Designed and instelled per Regulatory Guide Ill as discussed re not classified as either essential or nonessential in Section 18.1.11.
- Penetration P-22 and P-220 share primary containment isolation provisions.
- Penetration P-70 and J-202 share primary containment isolation provisions.
- Manual override of the isolation signal is provided to enable the operator to change the post-accident position of the valve.
- Y. This who will be tested as part of the MSIV secling system per chipper to requirements. containment isolation
- Z. Relief value set pressure 1480 Ps:5

provisions.

bb. functions p.20 /APZUA and P-213 B Stare primary

TABLE 6.2-16 (Cont'd)

(8) PEID(s) published as FSAR figures depicting the penetration configuration.

Note	Figures
A	5.1-3, Sh 1 5.1-3, Sh 2
В	5.1-3, Sh 2 6.7-1 5.1-3, Sh 1 5.4-8 5.4-17
C	6.3-1 5.4-13, Sh 1 5.4-13, Sh 1 5.4-13, Sh 2
Ε	6.3-7 6.3-1
F G H I J K L M	6.3-1 9.2-14. Sh 2
J	5.4-17 5.4-8 5.1-3, Sh 1
K	5.4-2, Sh 1 9.3-8
М	6.2-29 6.2-30
N	9.3-7, Sh 1 9.3-7, Sh 3
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R	9.5-32 4.6-6
Ť	6.3-1 5.4-13, Sh 1 5.4-8
U	6.3-7
W W	6.2-41 9.1-5, Sh 2
X	9.3-5, Sh 1 5.1-4, Sh 1
Ž.	Deleted 6.2-29
X Y Z AA BB	11.5-3. Sh 1
CC DO EE	9.3-5, Sh 2 5.4-13, Sh 2 5.4-2, Sh 1
FF	9.3-5 6.3-1
GG	6.2-41 5.1-3, Sh 1 5.1-3, Sh 2

TABLE 6.2-16 (Cont'd)

- (9) Post-Accident valve position (open or closed) is the position during the initial 10 minutes after an accident.
- (10) Shutdown valve position (open or closed) is the position beyond the initial 10 minutes after an accident.
- (11) The ESF System designation is applied to primary containment penetrations that are a part of an ESF System and where that part of the system provides or aids a function that is characteristic of an ESF System. Although reactivity control systems are not usually characterized as being ESF Systems, in this table reactivity control system penetrations are given the ESF system designation.
- (12) Manual indicates remote manual initiation of valve closure from the main control room, unless indicated otherwise.
- (13) The value is closed by remote manual initiation from the main control room.
- (14) operation is by local manual hand wheel.
- (15) The value closure times are indicative of the values rated capabilities. Maximum value closure times are given in Chapter 16.
- (16) The valve actuator is only will exercise the valve disk during testing.
- (17) Remote manual initiation capability is provided in 11002775 the main control noon for air. 955542 Amendment 6, 6/84

TABLE 6.2-25

PENETRATIONS USING A CLOSED SYSTEM OUTSIDE PRIMARY CONTAINMENT AS A SECOND ISOLATION BARRIER

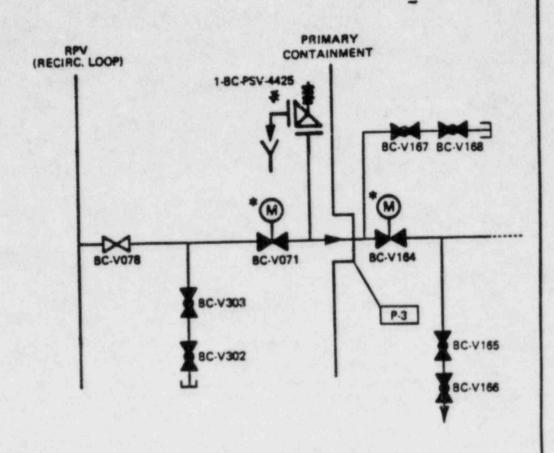
Containment Penetration	Line Isolated	Justification(1)
Number	RHR Shutdown Cooling Return	e
P=5A, 5B	Core Spray to Reactor	-
P-6A thru 6D	Injection	a, c, d
P-20l	Vacuum Breaker Network Branch HPCI Pump Suction	a,c
P-202 P-203	HPCI Minimum Return	a,c
P-204	HPCI & RCIC Vacuum Breaker Network	and
P-207 P-208	Vacuum Breaker Network Branch RCIC Pump Suction	a, c, d
P-209	RCIC Minimum Return	۵,د
P-211A thru 211D	RHR Pump Suction	1,0
P-212A, 212B	RHR Suppression Pool Cooling	a,c
P-213A, 213B	Vacuum Bracker Network Branch RIR Relief to Suppression Pool	a,c,d
P-214A, 214B	RHR to Suppression Pool Spray Header	•
P-216A thru 216D	Core Spray Pump Suction	a,c
P-217A, 217B	Core Spray Test to Suppression	۵,۷
P-228, J-209, J-217, J-219	Suppression Pool Water Level	b

Notes:

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(1) Justifications:

- a. A single isolation valve is used because the system provides or aids the emergency passage of fluids into and out of primary containment. The addition of a second containment isolation valve decreases the reliability of the system by providing an additional source of active failure.
- b. A single isolation valve is used because a second isolation valve would not add to the dependability of the containment boundary. These instrument lines are a reliable containment boundary. To add a second containment isolation valve would lengthen the containment boundary without a subsequent increase in the dependability of the containment boundary.
- c. The line to the suppression pool is always submerged so that the primary containment atmosphere cannot impingle upon the value.
 - d. the isolation provisions that are shared in common between containment penetrations p.201, P.20t, P.207, P.213 A, and P.2138, can be shown to provide isolation by redundant primary containment isolation valves, as an alternative to considering the vacuum breaker network as a closed system.



DETAIL 3

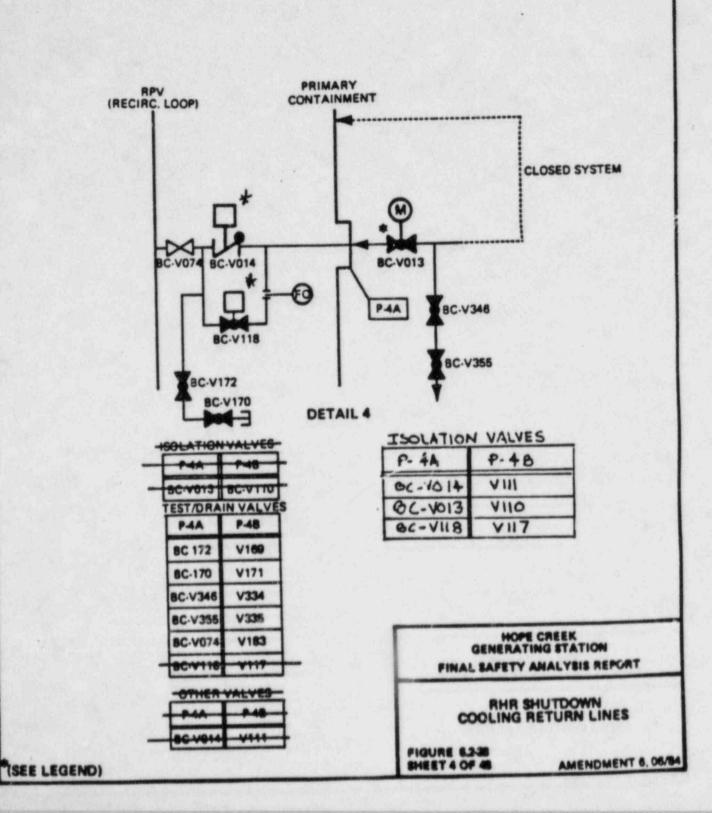
HOPE CREEK GENERATING STATION FINAL SAFETY ANALYSIS REPORT

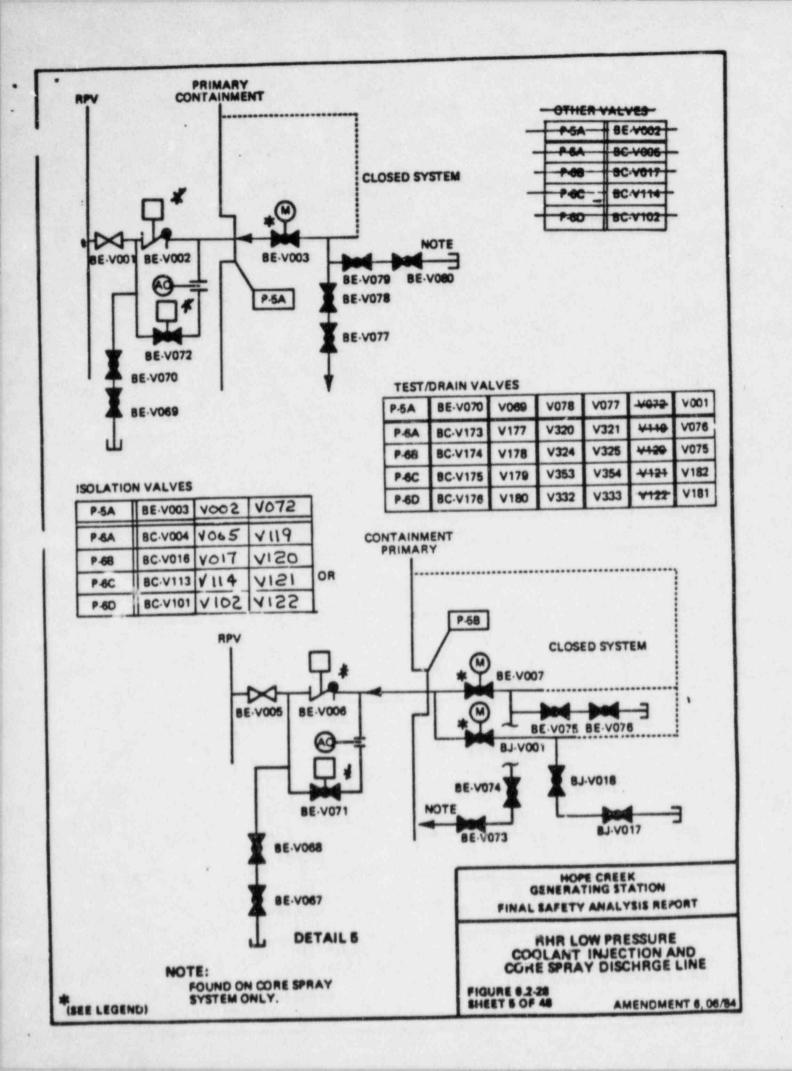
RHR SHUTDOWN COOLING SUCTION LINE

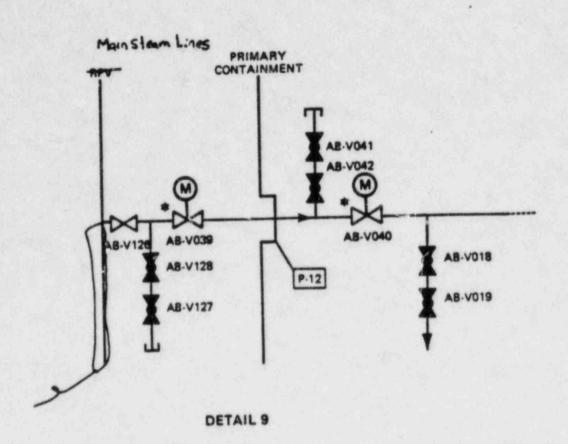
FIGURE 6.2-38 SHEET 3 OF 46

AMENDMENT 6, 06/84

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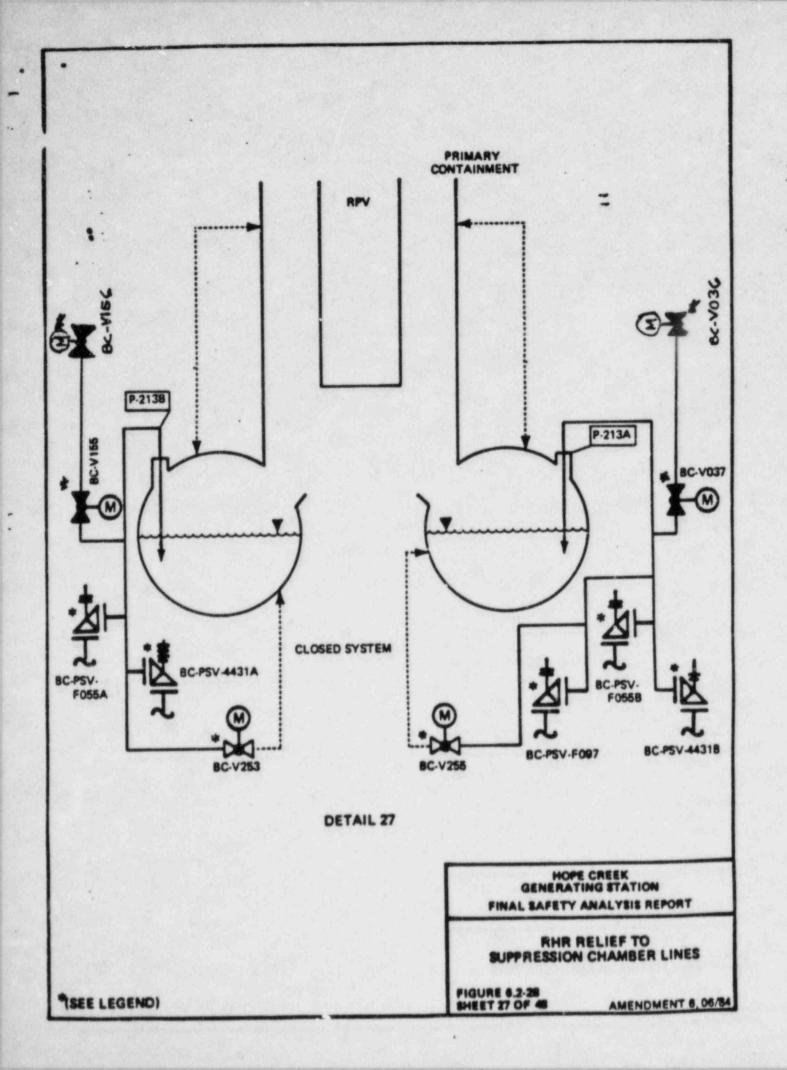


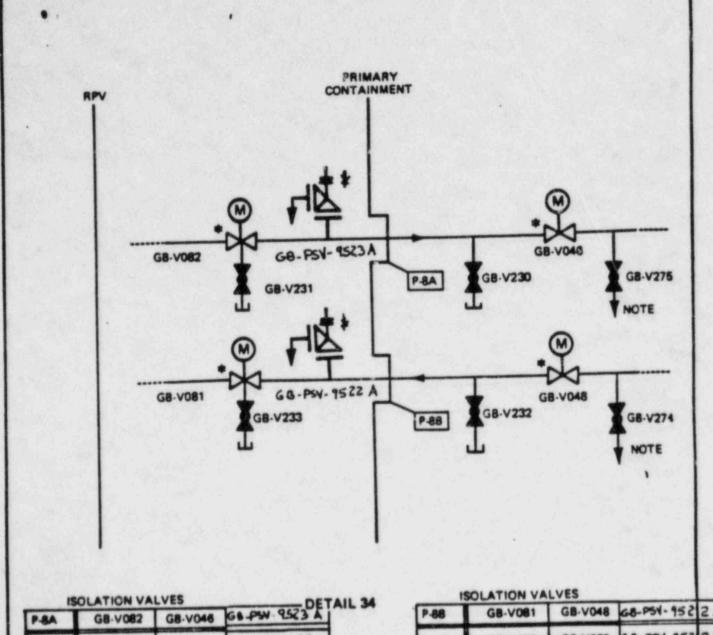
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GENERATING STATION
FINAL SAFETY ANALYSIS REPORT

MAIN STEAM DRAIN LINE

FIGURE 6.2-28 SHEET 9 OF 48

AMENDMENT 6, 06/84





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G8-V071

ISOLATION VALVES G8-V082

G8-V084 TEST VALVE

P-BA

P-368

NOTE: THIS IS A TEST TAP ON PAGA AND PAGE SISEE LEGENDI

68-P91-9523B

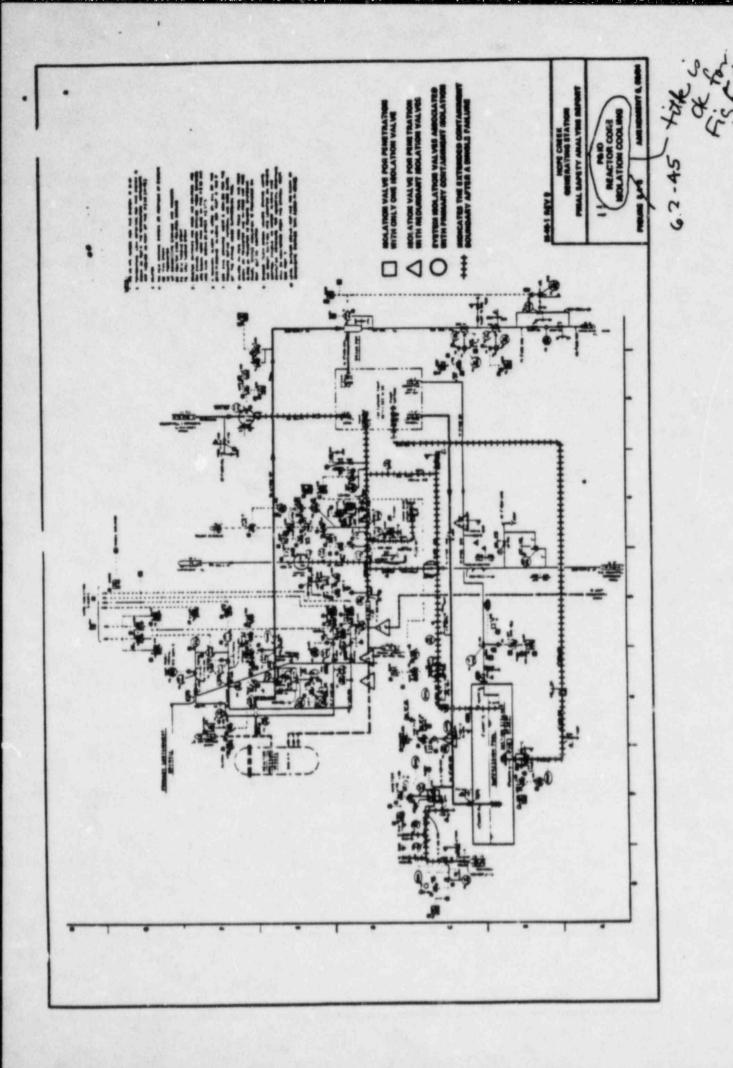
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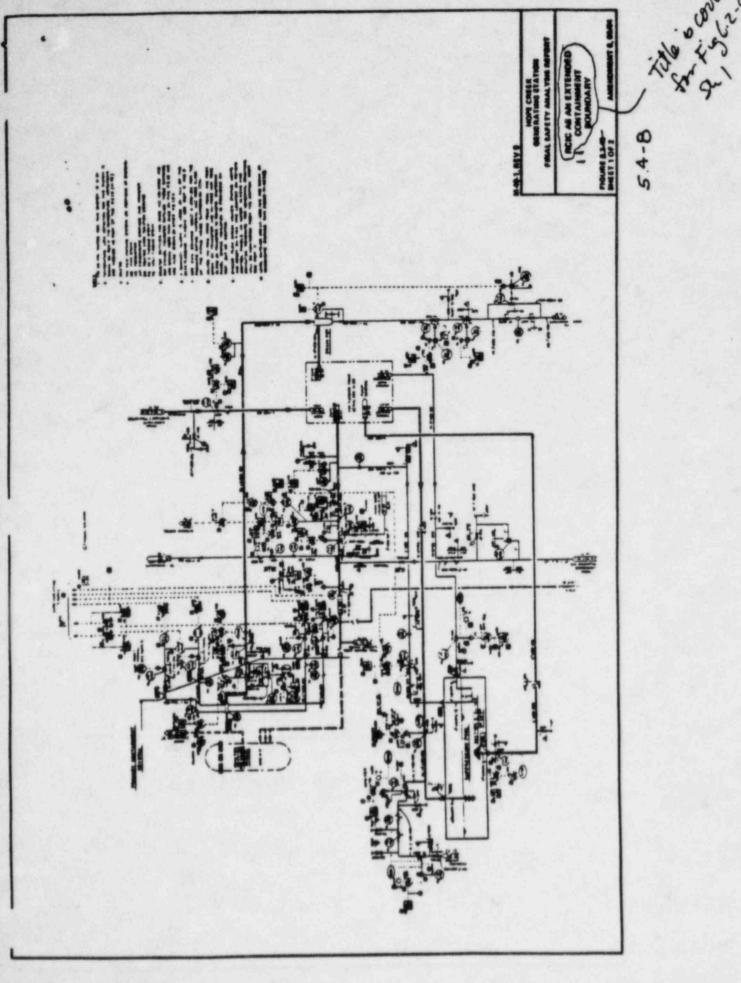
HOPE CREEK GENERATING STATION FINAL SAFETY ANALYSIS REPORT

CHILLER WATER SYSTEM LINES

FIGURE 8.2-26 SHEET 34 OF 48

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QUESTION 480.14 (SECTION 6.2.3)

Provide the following additional information related to potential bypass leakage paths given in Table 6.2-15.

- a. For each air or water seal demonstrate that a sufficient inventory of the fluid is available to maintain the seal 30 days following onset of a LOCA. Note that the suppression pool cannot be considered a water seal. Describe the testing and proposed entries for the Technical Specifications that will verify the assumptions used in the analyses.
- b. For each path where water seals eliminate the potential for bypass leakage, provide a sketch to show the location of the water seal relative to the system isolation valves.

RESPONSE

HCGS does consider the suppression pool to be an effective water seal. The suppression pool is a reliable source of water that an provide the required separation between the primary containment atmosphere and the environs. The suppression containment atmosphere and the environs. The suppression chamber's structural design is discussed in Section 3.8.2. Thus, we have considered it to be a water seal as indicated in Section 6.2.3.

Below is an item by item discussion of the ability of the air and water seal barriers identified in Table 6.2-15 to maintain sufficient inventory for 30 days following a LOCA. For those sufficient inventory for 30 days following a LOCA. For those valves maintaining a water seal, calculations have been done to valves maintaining a water seal, calculations have been done to valves for there is sufficient inventory for 30 days assuming leakage rates of 10 ml/h per inch of nominal valve diameter, unless otherwise indicated below (Reference 1). Except for HPCI unless otherwise indicated below (Reference 1). Except for HPCI valves FD-V017 and FD-V003, RCIC valves FC-V021 and FC-V015, and valves FD-V017 and FD-V004, all valves required to maintain a PACS valves ED-V003 and ED-V004, all valves required to maintain a water seal are 10 CFR 50 Appendix J, Type C tested. Those valves water seal are 10 CFR 50 Appendix J, Type C tested. Those valves water seal are not Type C tested will be identified in the technical that are not Type C tested will be identified in the technical ensure the existence of the water seal.

Main Steam - A positive air seal is maintained through the operation of the MSIV sealing system as discussed in Section 6.7.

Feedwater Line - There is sufficient water inventory for a 30-day seal. assuming a leakage rate of 40 ml/h per inch of nomial valve-diameter for valves AE 1903 and AE-1907. Figure 480.14-1 is provided to show the location of the water seal relative to the system isolation valves. The ECCS and RCK jockey pumps can be used to provide makeup should it be necessary.