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<u>Specification SR 5.3.12 - Steam Generator Tube Leaks</u> Surveillance

Following each steam generator tube leak, specimens from the accessible subheader tube connected to the leaking inaccessible tube(s) shall be metallographically examined. The results of this examination shall be compared to the results from the specimens of all previous tube leaks.

A study shall be performed to evaluate the size and elevation of all tube leaks to determine if a cause or trend in the degradation of the tubes can be identified.

Following each steam generator tube leak study, the Nuclear Regulatory Commission shall be notified as to the estimated size and elevation of the leaks as well as the results of the metallographic and engineering analyses performed that may identify the mechanism that caused the leak to occur.

Basis for Specification SR 5.3.12

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The surveillance plan outlined above is considered adequate to evaluate steam generator tube integrity and assure that the consequences of postulated tube leaks remain within the limits analyzed in the FSAR (see Section 14.5).

ATTACHMENT 2

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SIGNIFICANT HAZARDS CONSIDERATIONS

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I. EVALUATION

SR 5.3.12

The addition of this surveillance requirement will assure that the appropriate examination, analysis, and Nuclear Regulatory Commission notification requirements, as committed in P-84028, will be performed following any future tube leaks. The described program is considered adequate to monitor steam generator tube integrity and maintain the consequences of postulated tube leaks within the limits analyzed in the FSAR.

II. CONCLUSION

Based on the above evaluation, it is concluded that operation of Fort St. Vrain in accordance with the proposed changes will not (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident form any accident previously evaluated, or (3) involve a significant reduction in any margin of safety.

Therefore, these changes will not increase the risk to the health and safety of the public nor do they involve any significant hazards considerations.