

ENCLOSURE 3

VOGTLE ELECTRIC GENERATING PLANT
REQUEST TO REVISE TECHNICAL SPECIFICATIONS 3/4.6.1.7 AND 4.6.1.2f

INSTRUCTIONS FOR INCORPORATION

The proposed change to the Vogtle Unit 1 and Unit 2 Technical Specifications would be incorporated as follows:

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*Overleaf page. No change.

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CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- b. If any periodic Type A test fails to meet $0.75 L_a$, the test schedule for subsequent Type A tests shall be reviewed and approved by the Commission. If two consecutive Type A tests fail to meet $0.75 L_a$, a Type A test shall be performed at least every 18 months until two consecutive Type A tests meet $0.75 L_a$ at which time the above test schedule may be resumed;
- c. The accuracy of each Type A test shall be verified by a supplemental test which:
- 1) Confirms the accuracy of the test by verifying that the absolute value of the supplemental test result, L_c , minus the sum of the Type A and the superimposed leak, L_o , is equal to or less than $0.25 L_a$;
 - 2) Has a duration sufficient to establish accurately the change in leakage rate between the Type A test and the supplemental test; and
 - 3) Requires that the rate at which gas is injected into the containment or bled from the containment during the supplemental test is between $0.75 L_a$ and $1.25 L_a$.
- d. Type C and D tests shall be conducted with gas at a pressure not less than P_a , 45 psig, at intervals not greater than 24 months except for tests involving:
- 1) Air locks and
 - 2) Purge supply and exhaust isolation valves with resilient material seals.
- e. Air locks shall be tested and demonstrated OPERABLE by the requirements of Specification 4.6.1.3;
- f. Purge supply and exhaust isolation valves with resilient material seals shall be tested and demonstrated OPERABLE by the requirements of Specification 4.6.1.7.2 ~~and~~ 4.6.1.7.3
- g. The provisions of Specification 4.0.2 are not applicable.

CONTAINMENT SYSTEMS

CONTAINMENT VENTILATION SYSTEM

LIMITING CONDITION FOR OPERATION

3.6.1.7 Each containment purge supply and exhaust isolation valve (HV-2626A&B, HV-2627A&B, HV-2628A&B, HV-2629A&B) shall be OPERABLE and:

- a. Each 24-inch containment purge supply and exhaust isolation valve shall be closed and sealed closed, and
- b. The 14-inch containment purge supply and exhaust isolation valve(s) shall be closed to the maximum extent practicable but may be open for purge system operation for pressure control, for ALARA and respirable air quality considerations for personnel entry and for surveillance tests that require the valve(s) to be open.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

- a. With a 24-inch containment purge supply and/or exhaust isolation valve open or not sealed closed, close and seal that valve or isolate the penetration(s) within 4 hours, otherwise be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With the 14-inch containment purge supply and/or exhaust isolation valve(s) open for reasons other than given in Specification 3.6.1.7b above, close the open 14-inch valve(s) or isolate the penetration(s) within 4 hours, otherwise be in at least HOT STANDBY within the next 6 hours, and in COLD SHUTDOWN within the following 30 hours.
- c. ~~With a containment purge supply and/or exhaust isolation valve(s) having a measured leakage rate in excess of the limits of Specification 4.6.1.7.1, restore the inoperable valve(s) to OPERABLE status within 24 hours, otherwise be in at least HOT STANDBY within the next 6 hours, and in COLD SHUTDOWN within the following 30 hours.~~

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SURVEILLANCE REQUIREMENTS

4.6.1.7.1 Each 24-inch containment purge supply and exhaust isolation valve (HV-2626A, HV-2627A, HV-2628A, HV-2629A) shall be verified to be sealed closed at least once per 31 days.

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- c. With a Type C leakage test on the containment purge supply and/or exhaust penetrations exceeding 0.06 La, but the combined leakage rate for all penetrations and valves subject to Type B and C tests less than 0.60 La, reduce the leakage to less than 0.06 La within 24 hours by either restoring the affected valve(s) to OPERABLE status, or isolating each affected penetration by insertion of at least one blind flange outside of containment. Otherwise, be in at least HOT STANDBY within the next six hours, and in COLD SHUTDOWN within the following 30 hours.
- d. With a containment purge supply and/or exhaust isolation valve(s) having a measured leakage rate by either the Type C test or the between valve test such that the combined leakage rate for all penetrations and valves subject to Type B and C tests is greater than or equal to 0.60 La restore CONTAINMENT INTEGRITY within 1 hour or be in at least HOT STANDBY within the next 6 hours and COLD SHUTDOWN within the following 30 hours.

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

4.6.1.7.23 At least once per 3 months the containment purge valves with resilient material seals in each sealed closed containment purge supply and exhaust penetration shall be demonstrated OPERABLE by verifying that the measured penetration leakage rate is less than $0.06 L_a$ when pressurized to P_a .

4.6.1.7.24 Each 14-inch containment purge supply and exhaust isolation valve (HV-2626B, HV-2627B, HV-2628B, HV-2629B) shall be verified to be closed or open in accordance with Specification 3.6.1.7b at least once per 31 days.

bypressuring between the valves to P_a . If a containment purge penetration exceeds its required action limit, a Type C penetration leakage test shall be performed within 24 hours provided the total combined leakage rate remains less than $0.60 L_a$.

4.6.1.7.2 At least once per 24 months each containment purge supply and exhaust penetration shall be Type C tested. Each Type C test shall have a penetration leakage of less than $0.06 L_a$.

CONTAINMENT SYSTEMS

BASES

The required action limit for the quarterly surveillance specified in 4.6.1.7.3 is maintained in Section 6.2.6 of the FSAR and controlled by plant procedures.

CONTAINMENT VENTILATION SYSTEM (Continued)

The use of the containment purge lines is restricted to the 14-inch purge supply and exhaust isolation valves since, unlike the 24-inch valves, the 14-inch valves are capable of closing during a LOCA or steam line break accident. Therefore, the SITE BOUNDARY dose guideline of 10 CFR Part 100 would not be exceeded in the event of an accident during containment PURGING operation. Only safety-related reasons; e.g., containment pressure control or the reduction of airborne radioactivity to facilitate personnel access for surveillance and maintenance activities, should be used to justify the opening of these isolation valves.

Leakage integrity tests with a maximum allowable leakage rate for containment purge supply and exhaust supply valves will provide early indication of resilient material seal degradation and will allow opportunity for repair before gross leakage failures could develop. The 0.60 L leakage limit of Specification 3.6.1.2b. shall not be exceeded when the leakage rates determined by the leakage integrity tests of these valves are added to the previously determined total for all valves and penetrations subject to Type B and C tests.

3/4.6.2 DEPRESSURIZATION AND COOLING SYSTEMS

3/4.6.2.1 CONTAINMENT SPRAY SYSTEM

The OPERABILITY of the Containment Spray System ensures that containment depressurization and cooling capability will be available in the event of a LOCA or steam line break. The pressure reduction and resultant lower containment leakage rate are consistent with the assumptions used in the safety analyses.

The Containment Spray System and the Containment Cooling System both provide post-accident cooling of the containment atmosphere. However, the Containment Spray System also provides a mechanism for removing iodine from the containment atmosphere and therefore the time requirements for restoring an inoperable Spray System to OPERABLE status have been maintained consistent with that assigned other inoperable ESF equipment.

3/4.6.2.2 SPRAY ADDITIVE SYSTEM

The OPERABILITY of the Spray Additive System ensures that sufficient NaOH is added to the containment spray in the event of a LOCA. The limits on NaOH volume and concentration ensure a pH value of between 8.0 and 10.5 for the solution recirculated within containment after a LOCA. This pH band minimizes the evolution of iodine and minimizes the effect of chloride and caustic stress corrosion on mechanical systems and components. The solution volume limits (3700-4000 gallons) represent the required solution to be delivered (i.e., the delivered solution volume is that volume above the tank discharge). These assumptions are consistent with the iodine removal efficiency assumed in the safety analyses.