ENCLOSURE 2

PROPOSED TECHNICAL SPECIFICATIONS MARK-UP

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#### OPERATIONAL LEAKAGE

#### LIMITING CONDITION FOR OPERATION

3.4.3.2 Reactor coolant system leakage shall be limited to:

a, No PRESSURE BOUNDARY LEAKAGE.

b. 5 gpm UNIDENTIFIED LEAKAGE.

c. 25 gpm total leakage averaged over any 24-hour period.

 d. 1 gpm leakage at a reactor coolant system pressure of 1040 ± 10 psig from any reactor coolant system pressure isolation valve specified in Table 3.4.3.2-1.

2 opm increase in UNIDENTIFIED LEAKAGE within any 4-hour period.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

ACTION:

\* A "\_\_\_

- a. With any PRESSURE BOUNDARY LEAKAGE, be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the next 24 hours.
- With any reactor coolant system leakage greater than the limits in b and/or c, above, reduce the leakage rate to within the limits within 4 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
- c. With any reactor coolant system pressure isolation valve leakage greater than the above limit, isolate is high pressure portion of the affected system from the low pressure portion within 4 hours by use of at least one other closed manual, deactivated automatic, or check\* valve, or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
- d. With one or more of the high/low pressure interface valve leakage pressure monitors shown in Table 3.4.3.2-2 inoperable, restore the inoperable monitor(s) to OPERABLE status within 7 days or verify the pressure to be less than the alarm setpoint at least once per -12 hours; restore the inoperable monitor(s) to OPERABLE status within 30 days or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

With any reactor coolant system UNIVENTIFIED LEAKAGE increase greater than 2 gpm within any 4-hour period, identify the cource of leakageincrease as not servic, sensitive Type 304 or 316 austenitic stainless steel within 4 hours or be in at least HOT SHUTBOWN within the next 12 hours and in COLD SHUTDOWN within the following -24 hours.

\*Which has been verified not to exceed the allowable leakage limit at the last refueling outage or after the last time the valve was disturbed, whichever is more recent.

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#### Insert A

- e. 2 gpm increase in UNIDENTIFIED LEAKAGE within any 24 hour period during OPERATIONAL CONDITION 1.
- f. 2 gpm increase in UMIDENTIFIED LEAKAGE within a 7 4 hour period during OPERATIONAL CONDITIONS 2 and 3.

#### Insert B

- e. In OPERATIONAL CONDITION 1, with any reactor coolant system UNIDENTIFIED LEAKAGE increase greater than 2 gpm within any 24 hour period, identify the source of leakage increase as not service sensitive Type 304 or 316 austenitic stainless steel within 4 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
- f. In OPERATIONAL CONDITIONS 2 and 3, ith any reactor cooland system UNIDENTIFIED LEAKAGE increase greater than 2 gpm within any 4 hour period, identify the source of leakage increase as not service sensitive Type 304 or 316 austenitic stainless steel within 4 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

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#### SURVEILLANCE REQUIREMENTS

4.4.3.2.1 The reactor coolant system leakage shall be demonstrated to be within each of the above limits by:

 Monitoring the primary containment atmospheric gaseous radioactivity at least once per 4 hours,\*

 Monitoring the primary containment sump flow rate at least once per 4 hours.

 Monitoring the drywell floor drain sump level at least once per 4 hours, and.

Monitoring the reactor vessel head flange leak detection system at least once per 24 hours.\*

4.4.3.2.2 Each resider coolant system pressure isolation valve specified in Table 3.4.3.2-1 shall be demonstrated OPERABLE by leak testing pursuant to Specification 4.0.5 and verifying the leakage of each valve to be within the specified limit:

- a. At least once per 18 months, and
- b. Prior to returning the valve to service following maintenance, repair or replacement work on the valve which could affect its leakage rate.

The provisions of Specification 4.0.4 are not applicable for entry into OPERATIONAL CONDITION 3.

4.4.3.2.3 The high/low pressure interface valve leakage pressure monitors shall be demonstrated OPERABLE with alarm setpoints per Table 3.4.3.2-2 by performance of a:

a. CHAN IEL FUN TIONAL TEST at least once per 31 days, and

b. CHANNEL CALIBRATION at least once per 18 months.

\*Not a means of quantifying leakage.

\* \* THE PROVISIONS OF SPECIFICATION 4.0.2 ARE NOT APPLICABLE to the SURVEILLANCE REQUIREMENT IN OPERATIONAL CONDITION 1. FERMI - UNIT 2 3/4 4-11

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- b. Monitoring the primary containment sump flow rate at least once per 12 hours in OPERATIONAL CONDITION 1 and at least once per 4 hours in OPERATIONAL CONDITIONS 2 and 3,
- c. Monitoring the drywell floor drain sump level at least once per 12 hours in OPERATIONAL CONDITION 1 and at least once per 4 hours in OPERATIONAL CONDITIONS 2 and 3, and

BASES

## 3/4.4.3 REACTOR COOLANT SYSTEM LEAKAGE

# 3/4.4.3.1 LEAKAGE DETECTION SYSTEMS

The RCS leakage detection systems required by this specification are provided to monitor and detect leakage from the reactor coolant pressure boundary. These detection systems are consistent with the recommendations of Regulatory Guide 1.45, "Reactor Coolant Pressure Boundary Leakage Detection Systems", May 1973.

# 3/4.4.3.2 OPERATIONAL LEAKAGE

The allowable leakage rates from the reactor coolant system have been based on the predicted and experimentally observed behavior of cracks in pipes. The normally expected background leakage due to equipment design and the detection capability of the instrumentation for determining system leakage was also considered. The indence obtained from experiments suggests that for leakage somewhat greater than that specified for UNIDENTIFIED LEAKAGE the probability is small that the imperfection or crack associated with such leakage would grow rapidly. However, in all cases, if the leakage rates exceed the values specified or the leakage is located and known to be PRESSURE BOUNDARY LEAKAGE, the reactor will be shutdown to allow further investigation and corrective action. Service sensitive reactor coolant system Type 304 and 316 austenitic stainless steel piping; i.e., those that are subject to high stress or that contain relatively stagnant, intermittent, or low flow fluids, requires additional surveillance and leakage limits.

The purpose of the RCS interface valves leakage pressure monitors (LPMs) is to provide assurance of the integrity of the Reactor Coolant System pressure isolation valves which form a high/low pressure boundary. The LPM is designed to alarm on increasing pressure on the low pressure side of the high/low pressure interface to provide indication to the operator of abnormal interface valve leakage.

The Surveillance Requirements for RCS pressure isolation valves provide added assurance of valve integrity thereby reducing the probability of gross valve failure and consequent intersystem LOCA. Leakage from the RCS pressure isolation valves is IDENTIFIED LEAKAGE and will be considered as a portion of the allowed limit.

#### 3/4.4.4 CHEMISTRY

The water chemistry limits of the reactor coolant system are established to prevent damage to the reactor materials in contact with the coolant. Chloride limits are specified to prevent stress corrosion cracking of the stainless steel. The effect of chloride is not as great when the oxygen concentration in the coolant is low, thus the 0.2 ppm limit on chlorides is permitted during POWER OPERATION. During shutdown and refueling operations, the temperature necessary for stress corrosion to occur is not present so a 0.5 ppm concentration of chlorides is not considered harmful during these perious.

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The additional limit placed upon the rate of increase in UNIDENTIFIED LEAKAGE in OPERATIONAL CONDITION 1 meets the NRC Staff guidance in Generic Letter 85-01, "NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping". The applicability of the Generic Letter 88-01 limit to OPERATIONAL CONDITION 1 only ensures that the expected increases in UNIDENTIFIED LEAKAGE experienced during reactor vessel heatup and pressurization during startup do not cause unwarranted entries into the applicable ACTION statement. The race of increase in UNIDENTIFIED LEAKAGE limit in OPERATIONAL CONDITIONS 2 and 3 ensures that the above service sensitive reactor coolant system Type 304 and 316 austenitic stainless steel piping is nonitored during reactor startup prior to reactor vessel heatup and pressurization. The surveillance interval for determination of UNIDENTIFIED LEAKAGE in OPERATIONAL CONDITION 1 meets the guidance in Supplement 1 to Generic Letter 88-01. ENCLOSURE 3

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TECENICAL SPECIFICATION CHANGE PAGES

# Insert/Remove Summary

1

C

The following is an insert/remove summary for the proposed TS amendment. Pages marked with an asterisk  $(\tt^a)$  are overleaf pages.

Remove	Insert
3/4 4-9* 3/4 4-10 3/4 4-11 3/4 4-12* B 3/4 4-2 B 3/4 4-2a*	3/4 4-9* 3/4 4-10 3/4 4-11 3/4 4-11a 3/4 4-11b* 3/4 4-12* B 3/4 4-2a*

8

# 3/4.4.3 REACTOR COOLANT SYSTEM LEAKAGE

#### LEAKAGE DETECTION SYSTEMS

#### LIMITING CONDITION FOR OPERATION

3.4.3.1 The following reactor coolant system leakage detection systems shall be OPERABLE:

- The primary containment atmosphere gaseous radioactivity monitoring system channel.
- b. The primary containment sump flow monitoring system consisting of:
  - The drywell floor drain sump level, flow and pump-run-time system, and
  - The drywell equipment drain sump ievel, flow and pump-runtime system.
- c. The drywell floor drain sump level monitoring system.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

## ACTION:

With only two of the above required leakage detection systems OPERABLE, restore " perable detection system to OPERABLE status within 30 days; when a source digaseous radioactive monitoring system is inoperable, operation may continue for up to 30 days provided grab samples of the contained and analyzed at least once per 24 hours, otherwise, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

#### SURVEILLANCE REQUIREMENTS

4.4.3.1 The reactor coolant system leakars detection systems shall be demonstrated OPERABLE by:

- a. Primary containment atmosphere gaseous monitoring systemsperformance of a CHANNEL CHECK at least once per 12 hours, a CHANNEL FUNCTIONAL TEST at least once per 31 days and a CHANNEL CALIBRATION at least once per 10 months.
- b. Primary containment sump flow and drywell floor drain sump level monitoring systems-performance of a CHANNEL FUNCTIONAL TEST at least once per 31 days and a CHANNEL CALIBRATION TEST at least on a per 18 months.

## OPERATIONAL LEAKAGE

# LIMITING CONDITION FOR OPERATION

3.4.3.2 Reactor coolant system leakage shall be limited to:

- a. No PRESSURE BOUNDARY LEAKAGE.
- h. 5 gpm UNIDENTIFIED LEAKAGE.
- c. 25 gpm total leakage averaged over any 24-hour period.
- d. 1 gpm leakage at a reactor coolant system pressure of 1040 ± 10 psig from any reactor coolant system pressure isolation valve specified in Table 3.4.3.2-1.
- e. 2 gpm increase in UNIDENTIFIED LEAKAGE within any 24 hour period during OPERATIONAL CONDITION 1.
- f. 2 gpm increase in UNIDEN TIED LEAKAGE within any 4 hour period during OPERATIONAL CONDITIONS 2 and 3.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

## ACTION:

- a. With any PRESSURE BOUNDARY LEAKAGE, be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the next 24 hours.
- b. With any reactor coolant system leakage greater than the limits in b and/or c, above, reduce the leakage rate to within the limits within 4 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
- c. With any reactor coolant system pressure isolation valve leakage greater than the above limit, isolate the high pressure portion of the affected system from the low pressure portion within 4 hours by use of at least one other closed manual, deactivated automatic, or check\* valve or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
- d. With one or more of the high/low pressure interface valve leakage pressure monitors shown in Table 3.4.3.2-2 inoperable, restore the inoperable monitor(s) to OPERABLE status within 7 days or verify the pressure to be less than the alarm setpoint at least once per 12 hours, restore the inoperable monitor(s) to OPERABLE status within 30 days or be in at least HCT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

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<sup>\*</sup>Which has been verified not to exceed the allowable leakage limit at the last refueling outage or after the last time the valve was disturbed, whichever is more recent.

LIMITING CONDITION FOR OPERATION (Continued)

# ACTION: (Continued)

- e. In OPERATIONAL CONDITION 1, with any reactor coolant system UNIDENTIFIED LEAKAGE increase greater than 2 gpm within any 24 hour period, identify the source of leakage increase as not service sensitive Type 304 or 316 austenitic stainless steel within 4 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
- f. IN OPERATIONAL CONDITIONS 2 and 3, with any reactor coolant system UNIDENTIFIED LEAKAGE increase greater than 2 gpm within any 4 hour period, identify the source of leakage increase as not service sensitive Type 304 or 316 austenitic stainless steel within 4 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

## SURVEILLANCE REQUIREMENTS

4.4.3.2.1 The reactor coolant system leakage shall be demonstrated to be within each of the above limits by:

- a. Monitoring the primary containment atmospheric gaseous radioactivity at least ince per 4 hours,\*
- b. Monitoring the primary containment sump flow rate at least once per 12 hours in OPERATIONAL CONDITION 1\*\* and at 1 st once per 4 hours in OPERATIONAL CONDITIONS 2 and 3.
- c. Monitoring the drywell floor drain sump level at least once per 12 hours\*\*, in OPERATIONAL CONDITION 1\*\* and at least once per 4 hours in OPERATIONAL CONDITIONS 2 and 3. and
- d. Monitoring the reactor vessel head flange leak detection system at least once per 24 hours.\*

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<sup>\*</sup>Not a means of quantifying leakage.

<sup>\*\*</sup>The provisions of Specification 4.0.2 are not applicable to the surveillance requirement in OPERATIONAL CONDITION 1.

# SURVEILLANCE REQUIREMENTS (Continued)

4.4.3.2.2 Each reactor coolant system pressure isolation valve specified in Table 3.4.3.2-1 shall be demonstrated OPERABLE by leak testing pursuant to Specification 4.0.5 and verifying the leakage of each valve to be within the specified limit:

- a. At least once per 18 months, and
- b. Prior to returning the valve to service following maintenance, repair or replacement work on the valve which could affect its leakage rate.

The provisions of Specification 4.0.4 are not applicable for entry into OPERATIONAL CONDITION 3.

4.4.3.2.3 The nigh/low pressure interface valve leakage pressure monitors shall be demonstrated OPERABLE with alarm setpoints per Table 3.4.3.2-2 by performance of a:

- a. CHANNEL FUNCTIONAL TEST at least once per 31 days, and
- b. CHANNEL CALIBRATION at least once per 18 months.

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# REACTOR COOLANT SYSTEM PRESSURE ISOLATION VALVES

	VALVE NUMBER	VALVE DESCRIPTION		
1.	RHR System			
	E11-F015A E11 F015B E11-F050A	LPCI Loop A Injection Isolation Valve LPCI Loop B Injection Isolation Valve LPC' Loop A Injection Line Testable		
	E i 1 - F050B	Check Valve LPCI Loop B Injection Line Testable Check Valve		
	E11-F008	Shutdown Cooling RPV Suction Outboard Isolation Valve		
	E11-F009	Shutdcwn Cooling RPV Suction Inboard Isolation Valve Shutdown Cooling Suction Isolation Valve		
	E11-F608			
2.	Core Spray System			
	E21-F005A E21-F005B E21-F006A E21-F006P	Loop A Inboard Isolation Valve Loop B Inboard Isolation Valve Loop A Cc tailment Check Valve Loop B Containment Check Valve		
3.	High Pressure Coolant Injection System			
	E41-F007 E41-F006	Pump Discharge Outboard Isolation Valve Pump Discharge Inboard Isolation Valve		
4.	Reactor Core Isolation Cooling System			
	E51-F012 E51-F013	Pump Discharge Isolation Valve Pump Discharge to Feedwater Header Isolation Valve		
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# TABLE 3.4.3.2-2 REACTOR COOLANT SYSTEM INTERFACE VALVES LEAKAGE PRESSURE MONITORS

VALVE NUMBER SYSTEM (ps   E11-F015A & B, E11-F050A & B RHR LPCI < 44   E11-F008, F009, F608 P''R Shutdown Cooling < 13   E21-F005A & B, E21-F006A & B ' 'e Spray < 44	35
E41-F006, F007 I s 7	
E51-F012, F013 kuiú s 71	1

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374.4.3	REACTOR	COOLANT	SYS?EM	LEAKAGE
3/4.4.3.1				

The RCS leakage detection systems required by this specification are provided to monitor and detect leakage from the reactor coolant pressure boundary. These detection systems are consistent with the recommendations of Regulatory Guide 1.45, "Reactor Coolant Pressure Boundary Leakage Detection Systems", May 1973.

# 3/4.4.3.2 OPERATIONAL LEAKAGE

The allowable leakage rates from the reactor coolant system have been based on the predicted and experimentally observed behavior of cracks in pipes. The normally expected background leakage due to equipment design and the detection capability of the instrumentation for determining system leakage was also considered. The evidence obtained from experiments suggests that for leakage somewhat greater than that specified for UNIDENTIFIED LEAKAGE the probability is small that the imperfection or crack associated with such leakage would grow rapidly. However, in all cases, if the leakage rates exceed the values specified or the leakage is located and known to be PRESSURE BOUNDARY LEAKAGE, the reactor will be shutdown to allow further investigation and corrective action. Service sensitive reactor coolant system Type 304 and 316 austenitic stainless steel piping; i.e., those that are subject to high stress or that contain relatively stagnant, intermittent, or low flow fluids, requires additional surveillance and leakage limits. The additional limit placed upon the rate of increase in UNIDENTIFIED LEAKAGE in OPERATIONAL CONDITION 1 meets the NRC Staff guidance in Generic Letter 88-01, "NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping". The applicability of the Generic Letter 88-01 limit to OPERATIONAL CONDITION 1 only ensures that the expected increases in UNIDENTIFIED LEAKAGE experienced during reactor vessel heatup and pressurization during startup do not cause unwarranted entries into the applicable ACTION statement. The rate of increase in UNIDENTIFIED LFAKAGE limit in OPERATIONAL CONDITIONS 2 and 3 ensures that the above service sensitive reactor coolant system Type 304 and 316 austenitic stainless steel piping is monitored during reactor startup prior to reactor vessel heatup and pressurization. The surveillance interval for determination of UNIDENTIFIED LEAKAGE in OPERATIONAL CONDITION 1 meets the guidance in Supplement 1 to Generic Letter 88-01.

The purpose of the RCS interface valves leakage pressure monitors (LPMs) is to provide assurance of the integrity of the Reactor Coolant System pressure isolation valves which form a high/low pressure boundary. The LPM is designed to alarm on increasing pressure on the low pressure side of the high/low pressure interface to provide indication to the operator of abnormal interface valve leakage.

The Surveillance Requirements for RCS pressure isolation valves provide added assurance of valve integrity thereby reducing the probability of gross valve failure and consequent intersystem LOCA. Leakage from the RCS pressure isolation valves is IDENTIFIED LEAKAGE and will be considered as a portion of the allowed limit.

#### 3/4.4.4 CHEMISTRY

The water chemistry limits of the reactor coolani system are established to prevent damage to the reactor materials in contact with the coolant. Chloride limits are specified to prevent stress corrosion cracking of the

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## BASES

# CHEMISTRY (Continued)

stainless steel. The effect of chloride is not as great when the oxygen concentration in the coolant is low, thus the 0.2 ppm limit on chlorides is permitted during POWER OPERATION. During shutdown and refueling operations, the temperature necessary for stress corrosion to occur is n\_i present so a 0.5 ppm concentration of chlorides is not considered harmful during these periods. Conductivity measurements are required on a continuous basis since changes in this parameter are an indication of abnormal conditions. When the conductivity is within limits, the pH, chlorides and other impurities affecting conductivity must also be within their acceptable limits. With the conductivity meter inoperable, additional samples must be analyzed to ensure that the chlorides are not exceeding the limits.

The surveillance requirements provide adequate assurance that concentrations in excess of the limits will be detected in sufficient time to take corrective action.