

REFUELING OPERATIONS

3/4.9.4 CONTAINMENT BUILDING PENETRATIONS

LIMITED CONDITION FOR OPERATION

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

- a. The equipment hatch closed and held in place by a minimum of four bolts,
- b. ~~A minimum of one door in each airlock is closed,~~ and A minimum of one door in the emergency airlock is closed and one door in the personnel airlock is capable of being closed\*, and
- 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
  - 2) Be capable of being closed by an OPERABLE automatic containment ventilation 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.

\* Administrative controls shall ensure that:

- 1) Appropriate personnel are aware that both personnel airlock doors are open,
- 2) A specified individual(s) is designated and available to close the airlock following a required evacuation of containment, and
- 3) Any obstruction(s) (e.g., cables and hoses) that could prevent closure of an open airlock be capable of being quickly removed.

SURVEILLANCE REQUIREMENTS

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4.9.4 Each of the above required containment building penetrations shall be determined to be either in its ~~closed/isolated~~required condition or capable of being closed by an OPERABLE automatic containment ventilation 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 that,
  1. Containment ventilation isolation occurs on a high radiation test signal from a containment atmosphere gaseous monitoring instrumentation channel and the containment ventilation isolation valve(s) can be closed remotely from the control room, or
  2. the containment ventilation isolation valve(s) are closed/isolated.
- b. Verifying the remaining penetrations of 3.9.4, not covered by a. above, are in their ~~closed/isolated~~required condition.

### 3/4.9 REFUELING OPERATIONS

#### BASES

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#### 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. These limitations are consistent with the initial conditions assumed for the boron dilution incident in the safety analyses. The value of 0.95 or less for  $K_{eff}$  includes a 1%  $\Delta k/k$  conservative allowance for uncertainties. Similarly, the boron concentration value of 2400 ppm or greater includes a conservative uncertainty allowance of 50 ppm boron. The locking closed of the required valves during refueling operations precludes the possibility of uncontrolled boron dilution of the filled portion of the RCS. This action prevents flow to the RCS of unborated water by closing flow paths from sources of unborated water.

#### 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.

#### 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 ~~restricted from leakage to the environment~~ minimized. 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.

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

#### 3/4.9.5 COMMUNICATIONS

The requirement for communications capability ensures that refueling station personnel can be promptly informed of significant changes in the facility status or core reactivity conditions during CORE ALTERATIONS.