

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.6.1.3.3 -----NOTES-----</p> <ol style="list-style-type: none"> 1. Only required to be met in MODES 1, 2, and 3. 2. Valves and blind flanges in high radiation areas may be verified by use of administrative means. 3. Not required to be met for PCIVs that are open under administrative controls. <p>-----</p> <p>Verify each primary containment isolation manual valve and blind flange that is located outside primary containment, drywell, and steam tunnel and is required to be closed during accident conditions is closed.</p>	<p>31 days</p>
<p>SR 3.6.1.3.4 -----NOTES-----</p> <ol style="list-style-type: none"> 1. Only required to be met in MODES 1, 2, and 3. 2. Valves and blind flanges in high radiation areas may be verified by use of administrative means. 3. Not required to be met for PCIVs that are open under administrative controls. <p>-----</p> <p>Verify each primary containment isolation manual valve and blind flange that is located inside primary containment, drywell, or steam tunnel and is required to be closed during accident conditions is closed.</p>	<p>Prior to entering MODE 2 or 3 from MODE 4, if not performed within the previous 92 days</p>

INSERT 1 →

(continued)

INSERT 1:

4. Not required to be met for the Inclined Fuel Transfer System (IFTS) penetration when the associated primary containment blind flange is removed, provided that the Fuel Handling Building Fuel Transfer Pool water level is maintained $\geq 40'$ and the IFTS transfer tube drain valve remains closed. The IFTS transfer tube drain valve may be opened under administrative controls.

BASES

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SR 3.6.1.3.3 (continued)

verified to be in the proper position, is low. A third Note is included to clarify that PCIVs open under administrative controls are not required to meet the SR during the time the PCIVs are open.

SR 3.6.1.3.4

This SR verifies that each primary containment isolation manual valve and blind flange located inside primary containment, drywell, or steam tunnel, and required to be closed during accident conditions, is closed. The SR helps to ensure that post accident leakage of radioactive fluids or gases outside the primary containment boundary is within design limits. For devices inside primary containment, drywell, or steam tunnel, the Frequency of "prior to entering MODE 2 or 3 from MODE 4, if not performed within the previous 92 days," is appropriate since these devices are operated under administrative controls and the probability of their misalignment is low.

FOUR

~~Three~~ Notes are added to this SR. Note 1 provides an exception to meeting this SR in MODES other than MODES 1, 2, and 3. When not operating in MODES 1, 2, or 3, the primary containment boundary, including verification that required penetration flow paths are isolated, is addressed by LCO 3.6.1.10, "Primary Containment- Shutdown" (SR 3.6.1.10.1). The second Note allows valves and blind flanges located in high radiation areas to be verified by use of administrative means. Allowing verification by administrative means is considered acceptable, since access to these areas is typically restricted during MODES 1, 2, and 3 for ALARA reasons. Therefore, the probability of misalignment of these isolation devices, once they have been verified to be in their proper position, is low. A third Note is included to clarify that PCIVs that are open under administrative controls are not required to meet the SR during the time that the PCIVs are open.

Bases Insert

SR 3.6.1.3.5

Verifying the isolation time of each power operated and each automatic PCIV is within limits is required to demonstrate OPERABILITY. MSIVs may be excluded from this SR since MSIV

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BASES INSERT:

A fourth Note addresses removal of the Inclined Fuel Transfer System (IFTS) blind flange in MODES 1, 2, and 3. Requiring the Fuel Handling Building Fuel Transfer Pool water level to be $\geq 40'$ above the bottom of the pool ensures sufficient submergence of water over the bottom gate valve in the transfer tube to prevent direct communication between the Containment Building atmosphere and the Fuel Handling Building atmosphere, even upon occurrence of the peak post-accident pressure, P_a . Forty feet (40') above the bottom of the pool is equivalent to 22' 8 1/4" above the top of the flange for the IFTS bottom gate valve, which is approximately 3' 10" more water than needed to counteract the peak accident pressure of 7.8 psig. Also, since the IFTS drain piping does not have the same water seal as the transfer tube, administrative controls are required to ensure that the drain flow path can be quickly isolated whenever necessary.

These controls consist of designating an individual, whenever the 1F42-F003 valve is to be opened with the blind flange removed in MODE 1, 2, or 3, to be responsible for verifying closure of the valve if an accident occurs. This designated individual will remain in continuous communication with the control room, and be located at the 620' elevation in the Fuel Handling Area of the Intermediate Building. This person will be in addition to the minimum shift crew composition required to be at the plant site. Once the designated person is notified by the control room of the occurrence of an accident, his only assigned function will be to close this valve. The designated individual will verify the valve is closed from the controls at the IFTS panel if they are available. If this is not successful, the valve will be closed manually at the valve location. The designated person will be equipped with portable lighting (e.g., a flashlight) to supplement emergency lighting.

Also, the drain piping motor-operated isolation valve is tested in accordance with the Primary Containment Leak Rate Test Program. The leakage rate on this valve will be controlled by the strict limits on potential secondary containment bypass leakage (SR 3.6.1.3.9). Thus, the combination of water seal in the Fuel Handling Building, pressure integrity of the IFTS transfer tube, and administrative controls on the motor-operated drain valve in the drain piping, creates an acceptable barrier against post-accident leakage to the environment.