Docket No. 50-336 B13032

Attachment 1

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Millstone Nuclear Power Station, Unit No. 2 Proposed Changes to Technical Specifications

September 1988

SURVEILLANCE REQUIREMENT

4.4.5.1.3 <u>Inspection Frequencies</u> - The above required inservice inspections of steam generator tubes shall be performed at the following frequencies:

- a. The first inservice inspection shall be performed after 6 Effective Full Power Months but within 24 calendar months of initial criticality. Subsequent inservice inspections shall be performed at intervals of not less than 12 nor more than 24 calendar months after the previous inspection. If two consecutive inspections following service under AVT conditions, not including the preservice inspection, result in all inspection results falling into the C-1 category or if two consecutive inspections demonstrate that previously observed degradation has not continued and no additional degradation has occurred, the inspection interval may be extended to a maximum of once per 40 months.
- b. If the results of the inservice inspection of a steam generator conducted in accordance with Table 4.4-6 at 40 month intervals fall into Category C-3, the inspection frequency shall be increased to at least once per 20 months. The increase in inspection frequency shall apply until the subsequent inspections satisfy the criteria of Specification 4.4.5.1.3.a; the interval may then be extended to a maximum of once per 40 months.
- c. Additional, unscheduled inservice inspections shall be performed on each steam generator in accordance with the first sample inspection specified in Table 4.4-6 during the shutdown subsequent to any of the following conditions:
 - A seismic occurrence greater than the Operating Basis Earthquake.
 - A loss-of-coolant accident requiring actuation of the engineered safeguards.
 - 3. A main steam line or feedwater line break.
- d. If the unit is shut down to repair primary-to-secondary leakage, examinations and evaluations shall be conducted to:
 - 1. Identify the location of the leakage,
 - Investigate the cause,
 - 3. Identify appropriate corrective measures,
 - Verify that structural integrity is adequate.

These examinations and evaluations supersede the requirements of Section 4.4.5.1.2.

REACTOR COOLANT SYSTEM LEAKAGE

LIMITING CONDITION FOR OPERATION

3.4.6.2 Reactor Coolant System leakage shall be limited tc:

- a. No PRESSURE BOUNDARY LEAKAGE,
- b. 1 GPM UNIDENTIFIED LEAKAGE,
- c. 1 GPM total primary-to-secondary leakage through both steam generators and 0.10 GPM through any one steam generator, and
- d. 10 GPM IDENTIFIED LEAKAGE from the Reactor Coolant System.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

- a. With any PRESSURE BOUNDARY LEAKAGE, be in COLD SHUTDOWN within 36 hours.
- b. With any Reactor Coolant System leakage greater than any one of the above limits, excluding PRESSURE BOUNDARY LEAKAGE, reduce the leakage rate to within limits within 4 hours or be in COLD SHUTDOWN within the next 36 hours.

SURVEILLANCE REQUIREMENT

4.4.6.2 Reactor Coolant System leakages shall be demonstrated to be within each of the above limits by:

- Monitoring the containment atmosphere particulate radioactivity at least once per 12 hours.
- b. Monitoring the containment sump inventory at least once per 12 hours,
- c. Performance of a Reactor Coolant System water inventory balance at least once per 72 hours during steady state operation except when operating in the shutdown cooling mode.

BASES

evidence of mechanical damage or progressive degradation due to design, manufacturing errors or inservice conditions that lead to corrosion. Inservice inspection of steam generator tubing also provides a means of characterizing the nature and cause of any tube degradation so that corrective measures can be taken.

The plant is expected to be operated in a manner such that the secondary coolant will be maintained within those chemistry limits found to result in negligible corrosion of the steam generator tubes. If the secondary coolant chemistry is not maintained within these limits, localized corrosion may likely result in stress corrosion cracking.

The extent of cracking during plant operation would be limited by the limitation of steam generator tube leakage between the primary coolant system and the secondary coolant system (primary-to-secondary leakage = 0.10 GPM, per stear generator). Cracks having a primary-to-secondary leakage less than this limit during operation will have an adequate margin of safety to withstand the loads imposed during normal operation and by postulated accidents. Operating plants have demonstrated that primary-to-secondary leakage of 0.10 gallon per minute can readily be detected by radiation monitors of steam generator blowdown. Leakage in excess of this limit will require plant shutdown, during which the leaking tubes will be located and repaired. If the unit is shutdown to repair primary-to-secondary leakage, examinations and evaluations shall be conducted. These will: (1) locate the leakage; (2) investigate the cause with the intent of identifying the defect mechanism; and (3) identify appropriate corrective measures such as repairing tubes or revising operating parameters. Prior to restart of the unit, an evaluation will be performed to verify that structural integrity is adequate. This evaluation will assure that the design basis assumptions of the FSAR are met, along with other applicable licensing bases (e.g., Regulatory Guide 1.121).

Wastage-type defects are unlikely with proper chemistry treatment of the secondary coolant. However, even if a defect should develop in service, it will be found during scheduled inservice steam generator tube examinations. Plugging or sleeving will be required for all tubes with imperfections exceeding the plugging limit of 40% of the tube nominal wall thickness. Sleeving repair will be limited to those steam generator tubes with a defect between the tube sheet and the first eggcrate support. Tubes containing sleeves with imperfections exceeding the plugging limit will be plugged. Steam generator tube inspections of operating plants have demonstrated the capability to reliably detect degradation that has penetrated 20% of the original tube wall thickness.

Whenever the results of any steam generator tubing inservice inspection fall into Category C-3, these results will be promptly reported to the Commission pursuant to Specification 6.9.1 prior to resumption of plant operation. Such cases will be considered by the Commission on a case-by-case basis and may result in a requirement for analysis, laboratory examinations, tests, additional eddy-current inspection, and revision of the Technical Specifications, if necessary.

MILLSTONE - UNIT 2

BASES

3/4.4.6 REACTOR COOLANT SYSTEM LEAKAGE

3/4.4.6.1 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."

3/4.4.6.2 REACTOR COOLANT SYSTEM LEAKAGE

Industry experience has shown that while a limited amount of leakage is expected from the RCS, the unidentified portion of this leakage can be reduced to a threshold value of less than 1 GPM. This threshold value is sufficiently low to ensure early detection of additional leakage.

The 10 GPM IDENTIFIED LEAKAGE limitation provides allowance for a limited amount of leakage from known sources whose presence will not interfere with the detection of UNIDENTIFIED LEAKAGE by the leakage detection systems.

The total steam generator tube leakage limit of 1 GPM for all steam generators ensures that the dosage contribution from the tube leakage will be limited to a small fraction of Part 100 limits in the event of either a steam generator tube rupture or steam line break. The 1 GPM limit is consistent with the assumptions used in the analysis of these accidents.

PRESSURE BOUNDARY LEAKAGE of any magnitude is unacceptable since it may be indicative of an impending gross failure of the pressure boundary. Therefore, the presence of any PRESSURE BOUNDARY LEAKAGE requires the unit to be promptly placed in COLD SHUTDOWN.

The 0.10 GPM Primary to Secondary leakage limitation assures structural integrity. A tube with a through-wall circumferential crack which leaks at 0.10 GPM under normal operating conditions retains the structural margins recommended in Regulatory Guide 1.121. In addition, the total leakage under accident conditions would remain below the 1 GPM limit.