

ATTACHMENT 2  
PROPOSED CHANGES

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Amendment No. 33 by the Nuclear Regulatory Commission.

ISI Criterion C: The surveillance requirement shall be implemented before the beginning of fuel cycle 5.

ISI Criterion D: The surveillance requirement shall be implemented in the existing schedule of surveillance tests, following 90 days from the formal approval date of Amendment No. 33 by the Nuclear Regulatory Commission.

ISI Criterion E: Same as ISI Criterion A but applicable to Amendment No. 51.

ISI Criterion F: Same as ISI Criterion B but applicable to fuel cycle 5 and Amendment No. 51.

ISI Criterion G: Same as ISI Criterion D but applicable to Amendment No. 51.

ISI Criterion H: Same as ISI Criterion B but applicable to fuel cycle 5 and Amendment No. \_\_\_\_.

## 5.2 PRIMARY COOLANT SYSTEM - SURVEILLANCE REQUIREMENTS

### Applicability

Applies to the surveillance of the primary (helium) reactor coolant system, excluding the steam generators, and to the surveillance of the reactor auxiliary systems.

### Objective

To ensure the capability of the components of the primary reactor coolant system to maintain the primary reactor coolant envelope as a fission product barrier and to ensure the capability to cool the core under all modes of operation.

### Specification SR 5.2.1 - PCRV and PCRV Penetration Overpressure Protection Surveillance

- | a) Each of the two overpressure protection assemblies  
| protecting the PCRV shall be tested in accordance with  
| applicable ASME code requirements to verify their  
| setpoints.

| The PCRV safety valve containment tank closure bolting shall be visually examined for absence of surface defects when the tank is opened for the above testing. Tank closure flange leak tightness shall be determined following tank closure. SR 5.2.1.a shall be implemented per ISI Criterion H.

- b) Each of the two overpressure protection assemblies protecting a steam generator or a circulator penetration interspace shall be tested in accordance with applicable ASME code requirements to verify their setpoints.

SR 5.2.1.b shall be implemented per ISI Criterion H.

- c) The instrumentation and controls associated with the overpressure protection assemblies in a) and b) above shall be tested and calibrated as follows:

- 1) The pressure switch and alarm for each interspace between a rupture disc and the corresponding safety valve shall be functionally tested monthly and calibrated annually.

The pressure switch and alarm for the PCRV safety valve containment tank shall be functionally tested and calibrated annually.

SR 5.2.1.c.1 shall be implemented per ISI Criterion D.

- 2) The position indication circuits associated with the PCRV overpressure protection system shut off valves shall be functionally tested and calibrated when testing either of the PCRV overpressure

The rupture disc is designed to be removed from the system for bench testing. Verification is made of the correct deflection of the disc at the set pressure level which would cause the membrane to be ruptured. The safety valve is tested for setpoint activation without removing it from the system.

The pressurized portion of the assembly is monitored for leakage during plant operation. Leakage examination of the containment tank cover seals and visual examination of the cover bolts provides assurance that containment tank integrity is restored after the tank cover has been re-installed.

Testing of a PCRV penetration overpressure protection assembly can be performed during plant operation since the assemblies are accessible and since LCO 4.2.7 requires only one assembly to be operable at any time.

| The safety valve in each assembly is bench tested or  
| tested in place to demonstrate that it opens at the  
correct set pressure. The rupture discs are not provided  
with a testable design feature and, therefore, cannot be  
tested. However, one rupture disc of each type assembly  
is visually examined to verify that the membrane is free  
of defects and that the knife blade remains sharp.

ATTACHMENT 3

SIGNIFICANT HAZARDS  
CONSIDERATION

## SIGNIFICANT HAZARDS CONSIDERATION

### I. Evaluation

The proposed changes would modify SR 5.0, Surveillance Requirements; SR 5.2.1, PCRV and PCRV Penetration Overpressure Protection Surveillance; and the associated Basis. The following paragraphs evaluate the changes.

The new in-service inspection criterion will be added to SR 5.0 to explain implementation requirements of SR 5.2.1 and allow an orderly transition to the new surveillance schedule.

Note: one overpressure protection assembly consists of one Category C (safety valve) and one Category D (rupture disc) valve. Category definitions are contained in Subsection IGW or IWV of the ASME Code, Section XI.

SR 5.2.1.a and SR 5.2.1.b as currently written, require the overpressure protection assemblies to be tested at intervals not to exceed five years, on an alternating basis. Testing in accordance with applicable ASME code requirements would allow bench testing or in place testing and include verification of setpoints at five year intervals as well as additional testing for any assembly that failed to function on a regular test.

Testing in accordance with proven industry methods and standards will enhance the existing requirements for setpoint verification and provide additional confidence in the reliability of the overpressure protection assemblies.

The Basis for SR 5.2.1 has been revised to add the option of either bench testing or in place testing to demonstrate correct set pressure of PCRV penetration safety valves. Either method is acceptable under ASME code requirements. Tests conducted at Fort St. Vrain have indicated that bench testing, in some cases, will provide the most reliable and accurate indication of "as found" relief valve setpoints.

### II. Conclusion

Based on the above, operation of Fort St. Vrain in accordance with the proposed changes will not (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety. Therefore, this change will not create an undue risk to the health and safety of the public nor does it involve any significant hazards consideration.