Docket No. 50-271
BVY 99-75

Attachment 3

Vermont Yankee Nuclear Power Station

Proposed Technical Specification Change No. 203

Suppression Pool Water Temperature Surveillance

Marked-up Version of the Current Technical Specifications

## 3.7 LIMITING CONDITIONS FOR OPERATION

### 3.7 STATION CONTAINMENT SYSTEMS

Applicability:

Applies to the operating status of the primary and secondary containment systems.

Objective:

To assure the integrity of the primary and secondary containment systems.

Specification:

A. Primary Containment

1. Whenever primary containment is required, the volume and temperature of the water in the suppression chamber shall be maintained within the following limits:

   a. Maximum Water Temperature during normal operation - 90°F.

   b. Maximum Water Temperature during any test operation which adds heat to the suppression pool - 100°F; however, it shall not remain above 90°F for more than 24 hours.

   c. If Torus Water Temperature exceeds 110°F, initiate an immediate scram of the reactor. Power operation shall not be resumed until the pool temperature is reduced below 90°F.

   d. During reactor isolation conditions, the reactor pressure vessel shall be depressurized to less than 200 psig

## 4.7 SURVEILLANCE REQUIREMENTS

### 4.7 STATION CONTAINMENT SYSTEMS

Applicability:

Applies to the primary and secondary containment system integrity.

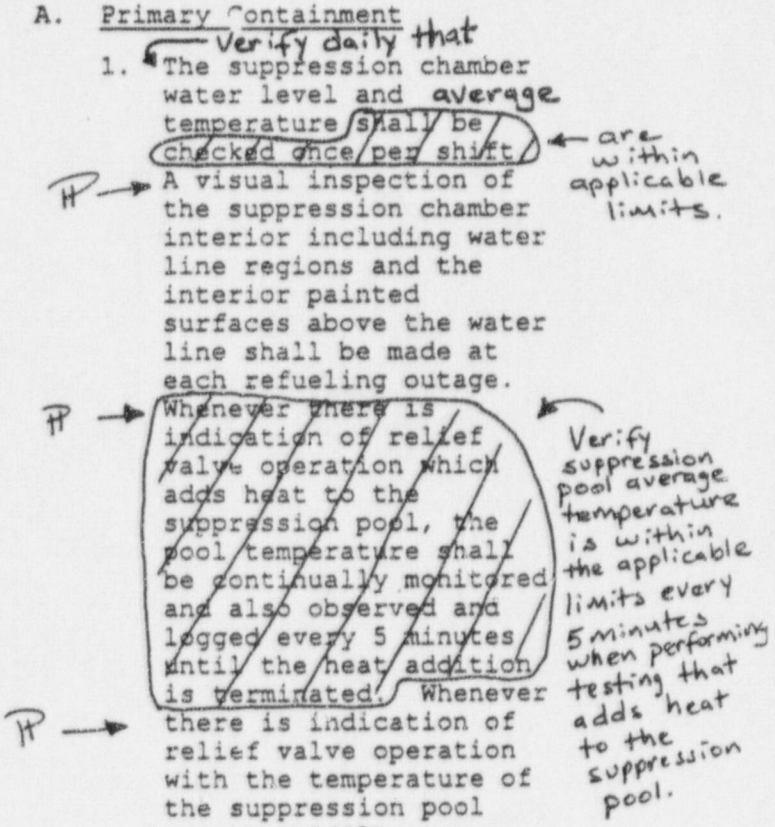
Objective:

To verify the integrity of the primary and secondary containments.

Specification:

A. Primary Containment

1. The suppression chamber water level and temperature shall be checked once per shift. A visual inspection of the suppression chamber interior including water line regions and the interior painted surfaces above the water line shall be made at each refueling outage. Whenever there is indication of relief valve operation which adds heat to the suppression pool, the pool temperature shall be continually monitored and also observed and logged every 5 minutes until the heat addition is terminated. Whenever there is indication of relief valve operation with the temperature of the suppression pool reaching 160°F or more and the primary coolant system pressure greater than 200 psig, an external visual examination of the suppression chamber shall be conducted before resuming power operation.



BASES: 3.7 (Cont'd)

The Standby Gas Treatment System (SGTS) is designed to filter and exhaust the Reactor Building atmosphere to the stack during secondary containment isolation conditions, with a minimum release of radioactive materials from the Reactor Building to the environs. To insure that the standby gas treatment system will be effective in removing radioactive contaminates from the Reactor Building air, the system is tested periodically to meet the intent of ANSI N510-1975. Both standby gas treatment fans are designed to automatically start upon containment isolation and to maintain the Reactor Building pressure to approximately a negative 0.15 inch water gauge pressure; all leakage should be in-leakage. Should the fan fail to start, the redundant alternate fan and filter system is designed to start automatically. Each of the two fans has 100% capacity. This substantiates the availability of the operable circuit and results in no added risk; thus, reactor operation or refueling operation can continue. If neither circuit is operable, the plant is brought to a condition where the system is not required.

When the reactor is in cold shutdown or refueling the drywell may be open and the Reactor Building becomes the only containment system. During cold shutdown the probability and consequences of a DBA LOCA are substantially reduced due to the pressure and temperature limitations in this mode. However, for other situations under which significant radioactive release can be postulated, such as during operations with a potential for draining the reactor vessel, during core alterations, or during movement of irradiated fuel in the secondary containment, operability of standby gas treatment is required. An alternate electrical power source for the purposes of Specification 3.7.B.1.b shall consist of either an Emergency Diesel Generator (EDG) or the Vernon Hydro tie line. Maintaining availability of the Vernon Hydro tie line as an alternative to one of the EDGs in this condition provides assurance that standby gas treatment can, if required, be operated without placing undue constraints on EDG maintenance availability. Inoperability of both circuits of the SGTS or both EDGs during refueling operations requires suspension of activities that represent a potential for releasing radioactive material to the secondary containment, thus placing the plant in a condition that minimizes risk.

Use of the SGTS, without the fan and the 9 kW heater in operation, as a vent path during torus venting does not impact subsequent adsorber capability because of the very low flows and because humidity control is maintained by the standby 1 kW heaters, therefore operation in this manner does not accrue as operating time.

D. Primary Containment Isolation Valves

Double isolation valves are provided on lines that penetrate the primary containment and communicate directly with the reactor vessel and on lines that penetrate the primary containment and communicate with the primary containment free space. Closure of one of the valves in each line would be sufficient to maintain the integrity of the pressure suppression system. Automatic initiation is required to minimize the potential leakage paths from the containment in the event of a loss-of-coolant accident.

4.7 STATION CONTAINMENT SYSTEMS

A. Primary Containment System

Move to next page

The water in the suppression chamber is used only for cooling in the event of an accident, i.e., it is not used for normal operation; therefore, a weekly check of the temperature and volume is adequate to assure that adequate heat removal capability is present.

BASES: 4.7 (Cont'd)

The interiors of the drywell and suppression chamber are painted to prevent rusting. The inspection of the paint during each major refueling outage, approximately once per year, assures the paint is intact. Experience with this type of paint at fossil fueled generating stations indicates that the inspection interval is adequate.

Because of the large volume and thermal capacity of the suppression pool, the volume and temperature normally changes very slowly and monitoring these parameters daily is sufficient to establish any temperature trends. By requiring the suppression pool temperature to be continually monitored and frequently logged during periods of significant heat addition, the temperature trends will be closely followed so that appropriate action can be taken. The requirement for an external visual examination following any event where potentially high loadings could occur provides assurance that no significant damage was encountered. Particular attention should be focused on structural discontinuities in the vicinity of the relief valve discharge since these are expected to be the points of highest stress. Visual inspection of the suppression chamber including water line regions each refueling outage is adequate to detect any changes in the suppression chamber structures.

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The average temperature is determined by taking an arithmetic average of OPERABLE suppression pool water temperature channels. The daily frequency has been shown, based on operating experience, to be acceptable. The frequencies are further justified in view of other indications available in the Control Room, including alarms, to alert operators to an abnormal condition.

When heat is being added to the suppression pool by testing, however, it is necessary to monitor suppression pool temperature more frequently. The 5 minute frequency during testing is justified by the rate at which tests will heat up the suppression pool. This has been shown to be acceptable based on operating experience, and provides assurance that allowable pool temperatures are not exceeded.

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Attachment 4

Vermont Yankee Nuclear Power Station

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Retyped Technical Specification Pages

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### 4.7 STATION CONTAINMENT SYSTEMS

Applicability:

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Objective:

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Specification:

A. Primary Containment

1. Verify daily that the suppression chamber water level and average temperature are within applicable limits.

   A visual inspection of the suppression chamber interior including water line regions and the interior painted surfaces above the water line shall be made at each refueling outage.

   Verify suppression pool average temperature is within the applicable limits every 5 minutes when performing testing that adds heat to the suppression pool.

   Whenever there is indication of relief valve operation with the temperature of the suppression pool reaching 160°F or more and the primary coolant system pressure greater than 200 psig, an external visual examination of the suppression chamber shall be conducted before resuming power operation.

BASES: 3.7 (Cont'd)

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