License Amendment Request - Adoption of TSTF-567, *Add Containment Sump Technical Specification to Address GSI-191 Issues*

Pre-submittal Meeting

December 9, 2021

PaloVerde™ GENERATING STATION

Agenda

- Overview of GL 2004-02 and TSTF-567
- Adoption of TSTF-567
- Schedule for Submittal

Overview of GL 2004-02 and TSTF-567

- Part of GL 2004-02 Closure Strategy
  - Current closure Option 2a for in-vessel effects pending WCAP-17788 work
  - Analysis result is strainer head loss (hydraulic and structural impact) more limiting than fuel debris (in-vessel) limit for PVNGS (microtherm)
  - Changing to Deterministic Option 1 (15g/FA acceptance criteria)
- PVNGS GL 2004-02 Completion Letter coordinated with LAR submittal
- Establishes new Licensing Basis for post accident Containment Sump performance
  - New TS for sump strainer - 90 days for engineering evaluation of new containment debris discoveries
- UFSAR Update Requires NRC Closure Letter for GL 2004-02 to implement
- No technical deviations from TSTF-567
- Minor editorial variations in the TS and TS Bases (e.g., PVNGS LCO numbers, etc.)

Adoption of TSTF-567

Technical Specification/Bases Changes

- Creates new LCO 3.6.7, *Containment Sump*
  - *Condition A* - One or more containment sumps inoperable due to containment accident generated and transported debris exceeding the analyzed limits. 90-day Completion time
- Deletes SR 3.5.3.8
- Replaced by new SR 3.6.7.1 for Containment Sump Inspections
- Modifies SR 3.5.4.1 to remove reference to SR 3.5.3.8
- Conforming TS Bases Changes
  - Strainer limits in Study 13-MS-C043 - Rewritten UFSAR Section 6.2.2.2.1 will replace existing Sections 6.2.2.2.1 and 6.2.2.2.2

Adoption of TSTF-567

Technical Specification Changes

3.6 CONTAINMENT SYSTEMS

3.6.7 Containment Sump

LCO 3.6.7 Two containment sumps shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, AND 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more containment sumps inoperable due to containment accident generated and transported debris exceeding the analyzed limits.	A.1 Initiate action to mitigate containment accident generated and transported debris. AND	Immediately
	A.2 Perform SR 3.4.14.1. AND	Once per 24 hours
	A.3 Restore the containment sumps to OPERABLE status.	90 days

Adoption of TSTF-567

Technical Specification Changes

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. One or more containment sumps inoperable for reasons other than Condition A.	B.1 ----------NOTES---------- 1. Enter applicable Conditions and Required Actions of LCO 3.5.3, "ECCS – Operating," and LCO 3.5.4, "ECCS – Shutdown," for emergency core cooling trains made inoperable by the containment sumps. 2. Enter applicable Conditions and Required Actions of LCO 3.6.6, "Containment Spray System," for containment spray trains made inoperable by the containment sumps. ---------- Restore the containment sumps to OPERABLE status.	72 hours
C. Required Action and associated Completion Time not met.	C.1 Be in MODE 3. AND C.2 Be in MODE 5.	6 hours 36 hours

Adoption of TSTF-567

Technical Specification Changes

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.7.1	Verify, by visual inspection, the containment sumps do not show structural damage, abnormal corrosion, or debris blockage.	In accordance with the Surveillance Frequency Control Program

Adoption of TSTF-567

Technical Specification Changes

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
~~SR 3.5.3.8~~	~~Verify, by visual inspection, each ECCS train containment sump suction inlet is not restricted by debris and the suction inlet strainers show no evidence of structural distress or abnormal corrosion.~~	~~In accordance with the Surveillance Frequency Control Program~~

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.5.4.1	The following SRs are applicable: SR 3.5.3.1 SR 3.5.3.2 SR 3.5.3.3 SR 3.5.3.4 SR 3.5.3.5 SR 3.5.3.7 ~~SR 3.5.3.8~~	In accordance with applicable SRs

Schedule for Submittal

- LAR submittal targeted by early January 2022
- Coordinated submittal with GL 2004-02 completion letter
- Request NRC review of both submittals within one year
- UFSAR updates to be implemented following NRC closure of GL 2004-02 and part of license amendment implementation