

**Advanced Passive 1000 (AP1000)
Generic Technical Specification Traveler (GTST)**

Title: Changes Related to LCO 3.6.3, Containment Isolation Valves

I. Technical Specifications Task Force (TSTF) Travelers, Approved Since Revision 2 of STS NUREG-1431, and Used to Develop this GTST

TSTF Number and Title:

TSTF-425, Rev. 3, Relocate Surveillance Frequencies to Licensee Control - RITSTF Initiative 5b

TSTF-440-A, Rev. 0, Eliminate Bases Requirement for Performing a System Walkdown

STS NUREGs Affected:

TSTF-425, Rev. 3: NUREG-1430, 1431, 1432, 1433, 1434

TSTF-440-A, Rev. 0: NUREG-1430, 1431, 1432

NRC Approval Date:

TSTF-425, Rev. 3: 06-Jul-09

TSTF-440-A, Rev. 0: 11-Oct-02

TSTF Classification:

TSTF-425, Rev. 3: Technical Change

TSTF-440-A, Rev. 0: Bases Only Change

II. Reference Combined License (RCOL) Standard Departures (Std. Dep.), RCOL COL Items, and RCOL Plant-Specific Technical Specifications (PTS) Changes Used to Develop this GTST

RCOL Std. Dep. Number and Title:

None

RCOL COL Item Number and Title:

None

RCOL PTS Change Number and Title:

VEGP LAR DOC A082: Revise "personal containment entry" to "personnel entry" for SR 3.6.3.1

VEGP LAR DOC M11: Containment Isolation Valve Revisions to TS 3.6.3

VEGP LAR DOC M13: Incorporation of TS 3.6.7 into TS 3.6.6 and Deletion of TS 3.6.7

III. Comments on Relations Among TSTFs, RCOL Std. Dep., RCOL COL Items, and RCOL PTS Changes

This section discusses the considered changes that are: (1) applicable to operating reactor designs, but not to the AP1000 design; (2) already incorporated in the GTS; or (3) superseded by another change.

TSTF-425 is deferred for future consideration.

IV. Additional Changes Proposed as Part of this GTST (modifications proposed by NRC staff and/or clear editorial changes or deviations identified by preparer of GTST)

In the “LCO” section of the bases, the phrase “and closed systems are intact” is to be removed in connection with LAR DOC M11 changes.

APOG Recommended Changes to Improve the Bases

Throughout the Bases, references to Sections and Chapters of the FSAR do not include the “FSAR” modifier. Since these Section and Chapter references are to an external document, it is appropriate to include the acronym “FSAR” to modify “Section” and “Chapter” in references to the FSAR throughout the Bases. (DOC A003)

Revise the “Actions” section of the Bases under heading “A.1 and A.2”, change “testing or valve manipulation” to “testing or device manipulation”.

Revise the “Actions” section of the Bases under heading “A.1 and A.2”, delete the word “potentially” from “...devices outside of containment and capable of potentially being mispositioned are in the correct position.”

Revise the “Surveillance Requirements” section of the Bases under heading “SR 3.6.3.2”, add clarifying nomenclature “containment isolation” before “valves outside containment”.

Revise the “Surveillance Requirements” section of the Bases under heading “SR 3.6.3.3”, change “This Note allows valves...” to “The Note allows valves...” in the second paragraph, first sentence.

Revise the “Surveillance Requirements” section of the Bases under heading “SR 3.6.3.5”, add clarifying nomenclature “containment” before “isolation signal” in the first sentence.

Revise the “Surveillance Requirements” section of the Bases under heading “SR 3.6.3.5”, add the sentence “The ACTUATION LOGIC TEST overlaps this Surveillance to provide complete testing of the assumed safety function.”

V. Applicability

Affected Generic Technical Specifications and Bases:

Section 3.6.3, Containment Isolation Valves

Changes to the Generic Technical Specifications and Bases:

Bases for Required Action A and Surveillance Requirement (SR) 3.6.3.2 of Specification 3.6.3 are revised to incorporate TSTF-440-A. The words “through a system walkdown” have been deleted.

The LCO 3.6.3 Statement and “LCO” section of the bases are revised to exclude containment isolation valves associated with closed systems. (DOC M11)

The Condition A Note is deleted and the “Actions” section of the Bases is revised to delete discussion of the Condition A Note. (DOC M11)

The Condition B Note is deleted and the “Actions” section of the Bases is revised to delete discussion of the Condition B Note. (DOC M11)

Condition C and the associated Bases are deleted. Condition D is renumbered to Condition C and Required Actions D.1 and D.2 are renumbered to Required Actions C.1 and C.2. (DOC M11)

SR 3.6.3.1 is revised. The word “containment” is deleted from the phrase “personnel containment entry”. (DOC A082)

The “Applicability” section of the Bases is revised. Reference to LCO 3.6.8 is revised to LCO 3.6.7. (DOC M13)

The “LCO” section of the bases is revised. The phrase “and closed systems are intact” is deleted in connection with changes under DOC M11. (NRC staff proposed change)

The “References” section of the Bases is revised. Reference to Standard Review Plan 6.2.4 is deleted. (DOC M11)

The acronym “FSAR” is added to modify “Section” and “Chapter” in references to the FSAR throughout the Bases. (DOC A003) (APOG Comment)

An editorial change for consistency is made to the “Actions” section of the Bases under heading “A.1 and A.2”. The third sentence is changed from “...testing or valve manipulation...” to “...testing or device manipulation...”. (APOG Comment)

An editorial clarification is made to the “Actions” section of the Bases under heading “A.1 and A.2”. In the fourth sentence the word “potentially” is deleted from “...devices outside of containment and capable of potentially being mispositioned are in the correct position.” (APOG Comment)

An editorial clarification is made to the “Surveillance Requirements” section of the Bases under heading “SR 3.6.3.2”, first paragraph. The clarifying nomenclature “containment isolation” is added before “valves outside containment”. (APOG Comment)

An editorial change is made to the “Surveillance Requirements” section of the Bases under heading “SR 3.6.3.3”, second paragraph. The first sentence is changed from “This Note allows valves...” to “The Note allows valves...” (APOG Comment)

An editorial clarification is made to the “Surveillance Requirements” section of the Bases under heading “SR 3.6.3.5”. The clarifying nomenclature “containment” is added before “isolation signal” in the first sentence. (APOG Comment)

An editorial clarification is made to the “Surveillance Requirements” section of the Bases under heading “SR 3.6.3.5”. After the second sentence “The ACTUATION LOGIC TEST overlaps this Surveillance to provide complete testing of the assumed safety function.” is added. (APOG Comment)

VI. Traveler Information

Description of TSTF changes:

TSTF-440-A revises the Bases to remove specific requirements to perform a system walkdown when verifying that a flow path is isolated or that valves are in the correct position. The change deletes the words “through a system walkdown” from the Required Action A and SR 3.6.3.2 of the Bases for Specification 3.6.3.

Rationale for TSTF changes:

TSTF-440-A: Deleting the words “through a system walkdown” aligns the Bases of this specification with other specifications. Other similar Actions and Surveillances which require verification that a flow path is isolated or that valves are in the correct position do not specify in the Bases how this verification must be accomplished.

Description of changes in RCOL Std. Dep., RCOL COL Item(s), and RCOL PTS Changes:

VEGP LAR DOC M11 revises TS 3.6.3 to exclude all closed system containment isolation valves. Condition A and Condition B Notes are deleted, Condition C and associated Required Actions are deleted, and Condition D and associated Required Actions are renumbered as Condition C and Required Actions C.1 and C.2. Reference to Standard Review Plan 6.2.4 is deleted from the “References” section of the bases.

VEGP LAR DOC A082 revises the phrase “personnel containment entry” to “personnel entry” for consistency.

VEGP LAR DOC M13 revises the reference to LCO 3.6.8 to LCO 3.6.7 in the “Applicability” section of the Bases.

Rationale for changes in RCOL Std. Dep., RCOL COL Item(s), and RCOL PTS Changes:

VEGP LAR DOC M11 eliminates TS requirements for containment isolation valves associated with a closed system.

VEGP LAR DOC A082 provides consistency with NUREG-1431 SR 3.6.3.2.

VEGP LAR DOC M13 deletes LCO 3.6.7 and LCO 3.6.8 is renumbered LCO 3.6.7.

Description of additional changes proposed by NRC staff/preparer of GTST:

The phrase “and closed systems are intact” is deleted in the “LCO” section in the bases.

The acronym “FSAR” is added to modify “Section” and “Chapter” in references to the FSAR throughout the Bases. (DOC A003) (APOG Comment)

An editorial change for consistency is made to the “Actions” section of the Bases under heading “A.1 and A.2”. The third sentence is changed from “...testing or valve manipulation...” to “...testing or device manipulation...”. (APOG Comment)

An editorial clarification is made to the “Actions” section of the Bases under heading “A.1 and A.2”. In the fourth sentence the word “potentially” is deleted from “...devices outside of containment and capable of potentially being mispositioned are in the correct position.” (APOG Comment)

An editorial clarification is made to the “Surveillance Requirements” section of the Bases under heading “SR 3.6.3.2”, first paragraph. The clarifying nomenclature “containment isolation” is added before “valves outside containment”. (APOG Comment)

An editorial change is made to the “Surveillance Requirements” section of the Bases under heading “SR 3.6.3.3”, second paragraph. The first sentence is changed from “This Note allows valves...” to “The Note allows valves...” (APOG Comment)

An editorial clarification is made to the “Surveillance Requirements” section of the Bases under heading “SR 3.6.3.5”. The clarifying nomenclature “containment” is added before “isolation signal” in the first sentence. (APOG Comment)

An editorial clarification is made to the “Surveillance Requirements” section of the Bases under heading “SR 3.6.3.5”. After the second sentence “The ACTUATION LOGIC TEST overlaps this Surveillance to provide complete testing of the assumed safety function.” is added. (APOG Comment)

Rationale for additional changes proposed by NRC staff/preparer of GTST:

To be consistent with changes under DOC M11.

Since Bases references to FSAR Sections and Chapters are to an external document, it is appropriate to include the “FSAR” modifier.

Changing “...testing or valve manipulation...” to “...testing or device manipulation...” is an editorial clarification and improves consistency with STS NUREG-1431, Rev 4.

Deleting the word “potentially” from “...devices outside of containment and capable of potentially being mispositioned are in the correct position.” is an editorial clarification and improves consistency with STS NUREG-1431, Rev 4.

Adding “containment isolation” before “valves outside containment” is an editorial clarification and improves consistency with STS NUREG-1431, Rev 4. (APOG Comment)

Revising the sentence from “This Note allows valves...” to “The Note allows valves...” is an editorial correction. (APOG Comment)

Adding “containment” before “isolation signal” is an editorial clarification and improves consistency with STS NUREG-1431, Rev 4. (APOG Comment)

Adding the sentence “The ACTUATION LOGIC TEST overlaps this Surveillance to provide complete testing of the assumed safety function.” is an editorial clarification. (APOG Comment)

VII. GTST Safety Evaluation

Technical Analysis:

TSTF-440-A: The Technical Specifications contain many Surveillances and Required Actions which require periodic verification of the alignment or isolation of a system. Specification 3.6.3 states that a system walkdown must be performed. This level of detail eliminates flexibility in performance of the required actions. While a system walkdown may still be utilized to meet the requirement, other methods, such as the use of remote valve position indication, will still meet the intent of the Specifications without unintended consequences, such as increased personnel dose.

VEGP LAR DOC M11: GTS 3.6.3 provides the requirement for the containment isolation valve function. This is revised to exclude all closed system containment isolation valves. Some of the valves that are containment isolation valves are also required to be Operable to meet other safety related functions, and these requirements are provided in separate LCOs. Thus, for certain containment isolation valves on closed systems, the same valve has two separate TS that cover its requirements. GTS 3.7.1 provides requirements for MSSVs, GTS 3.7.2 provides requirements for the MSIVs, GTS 3.7.3 provides requirements for the MFIVs, GTS 3.7.7 provides requirements for the startup feedwater isolation valves, and GTS 3.7.10 provides requirements for the power operated relief valve (PORV) block valves and the SG blowdown isolation valves.

In lieu of including these valves in both TS 3.6.3 and their individual Specification, TS 3.6.3 is revised to exclude all closed system containment isolation valves. The remaining closed system containment isolation valves that are not covered by TS 3.7.1, TS 3.7.2, TS 3.7.3, TS 3.7.7, and TS 3.7.10, are MSIV bypass valves and the main steam line drain valves. The requirements for these containment isolation valves are added to the revised TS 3.7.2 with the other steam line flow path isolation valves. All of the moved containment isolation valves are associated with a closed system and they are the only closed system containment isolation valves. The individual Specifications where these valves are moved to include the same or more restrictive requirements as currently in GTS 3.6.3, or have been revised to include the requirements from GTS 3.6.3.

VEGP LAR DOC A082: GTS SR 3.6.3.1 uses the term "personnel containment entry." This is revised to "personnel entry". The bases for SR 3.6.3.1 does not include the term "containment." This is an administrative change and does not result in a technical change to the TS.

VEGP LAR DOC M13: The reference to LCO 3.6.8 is revised to LCO 3.6.7 in the "Applicability" section of B 3.6.3. This change is an editorial change due to the deletion of the GTS 3.6.7 made by DOC M13.

The remaining changes are editorial, clarifying, grammatical, or otherwise considered administrative. These changes do not affect the technical content, but improve the readability, implementation, and understanding of the requirements, and are therefore acceptable.

Having found that this GTST's proposed changes to the GTS and Bases are acceptable, the NRC staff concludes that AP1000 STS Subsection 3.6.3 is an acceptable model Specification for the AP1000 standard reactor design.

References to Previous NRC Safety Evaluation Reports (SERs):

None

VIII. Review Information

Evaluator Comments:

None

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Review Information:

Availability for public review and comment on Revision 0 of this traveler approved by NRC staff on 5/23/2014.

APOG Comments (Ref. 7) and Resolutions:

1. (Internal #3) Throughout the Bases, references to Sections and Chapters of the FSAR do not include the "FSAR" modifier. Since these Section and Chapter references are to an external document, it is appropriate (DOC A003) to include the "FSAR" modifier. This is resolved by adding the FSAR modifier to every FSAR reference in the Bases.
2. (Internal #6) The GTST sections often repeat VEGP LAR DOCs, which reference "existing" and "current" requirements. The inclusion in the GTST of references to "existing" and "current," are not always valid in the context of the GTS. Each occurrence of "existing" and "current" should be revised to be clear and specific to GTS, MTS, or VEGP COL TS (or other), as appropriate. This is resolved by making the APOG recommended changes to the GTST.
3. (Internal #13) The NRC approval of TSTF-425, and model safety evaluation provided in the CLIP for TSTF-425, are generically applicable to any design's Technical Specifications. As such, the replacement of certain Frequencies with a Surveillance Frequency Control Program should be included in the GTST for AP1000 STS NUREG.

However, implementation in the AP1000 STS should not reflect optional (i.e., bracketed) material showing retention of fixed Surveillance Frequencies where relocation to a Surveillance Frequency Control Program is acceptable. Since each represented AP1000 Utility is committed to maintaining standardization, there is no rationale for an AP1000 STS that includes bracketed options.

Consistent with TSTF-425 criteria, replace applicable Surveillance Frequencies with "In accordance with the Surveillance Frequency control Program" and add that Program as new AP1000 STS Specification 5.5.15.

NRC Staff disagreed with implementing TSTF-425 in the initial version of the STS. Although the APOG thinks the analysis supporting this traveler is general enough to be applicable to AP1000, staff thinks an AP1000-specific proposal from APOG is needed to identify any GTS SRs that should be excluded. Also, with the adoption of a Surveillance Frequency Control Program (SFCP) in the AP1000 STS, bracketed Frequencies, which provide a choice between the GTS Frequency and the SFCP Frequency, are needed

because the NRC will use the AP1000 STS as a reference, and to be consistent with NUREG-1431, Rev. 4. APOG was requested to consider proposing an AP1000 version of TSTF-425 for a subsequent revision of the STS.

4. (Internal #341) Condition A and Condition B statements are misaligned. Additional typographical error in "NOTES" dashes ("-") rolling to next line. Correct formatting of dashed lines of Actions table Notes, and correct alignment of Condition statements for Conditions A and B. This is resolved by making the appropriate APOG recommended corrections to the format of Condition A, Condition B, and Notes.
5. (Internal #342) There is an empty row after the row for Condition B. Delete the extra row. This APOG recommended correction is resolved by deleting the extra row after Condition B.
6. (Internal #343) Revise TS 3.6.3 Bases for Required Actions A.1 and A.2 to change from "testing or valve manipulation" to "testing or device manipulation" since the TS Required Action A.2 cites "devices" and not "valves". This is resolved by making the APOG recommended change to the "Actions" section of the Bases, under heading "A.1 and A.2"; second paragraph, third sentence.
7. (Internal #344) Revise TS 3.6.3 Bases for Required Actions A.1 and A.2 to change from "potentially being" to "being" for clarity and to match NUREG-1431 wording. This is resolved by making the APOG recommended change to the "Actions" section of the Bases, under heading "A.1 and A.2"; second paragraph, fourth sentence.
8. (Internal #345) Revise SR 3.6.3.2 Bases to add clarifying nomenclature consistent with NUREG-1431 wording. This is resolved by making the APOG recommended changes to add "containment isolation" before "valves outside containment" in the "Surveillance Requirements" section of the Bases, under heading "SR 3.6.3.2", first paragraph.
9. (Internal #346) Editorial change is recommended. These non-technical changes provide improved clarity, consistency, and operator usability. This is resolved by making the APOG recommended change to the "Surveillance Requirements" section of the Bases, under heading "SR 3.6.3.3", second paragraph:

~~This~~**The** Note allows valves and blind flanges located in high radiation areas to be verified closed by use of administrative controls...."
10. (Internal #347) Revise SR 3.6.3.5 Bases to add clarifying nomenclature consistent with NUREG-1431 wording. This is resolved by making the APOG recommended change to add "containment" before "isolation signal" in the "Surveillance Requirements" section of the Bases, under heading "SR 3.6.3.5", first sentence.
11. (Internal #348) Editorial change for clarity - These changes are made for consistency with the TS requirement(s) being discussed in the TS Bases. This is resolved by APOG making the recommended change of adding the sentence "The ACTUATION LOGIC TEST overlaps this Surveillance to provide complete testing of the assumed safety function." to the "Surveillance Requirements" section of the Bases, under heading "SR 3.6.3.5".

NRC Final Approval Date: 5/12/2015

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IX. Evaluator Comments for Consideration in Finalizing Technical Specifications and Bases

None

X. References Used in GTST

1. AP1000 DCD, Revision 19, Section 16, "Technical Specifications," June 2011 (ML11171A500).
2. Southern Nuclear Operating Company, Vogtle Electric Generating Plant, Units 3 and 4, Technical Specifications Upgrade License Amendment Request, February 24, 2011 (ML12065A057).
3. TSTF-GG-05-01, "Writer's Guide for Plant-Specific Improved Technical Specifications," June 2005 (ML070660229).
4. NRC Safety Evaluation (SE) for Amendment No. 13 to Combined License (COL) No. NPF-91 for Vogtle Electric Generating Plant (VEGP) Unit 3, and Amendment No. 13 to COL No. NPF-92 for VEGP Unit 4, September 9, 2013, ADAMS Package Accession No. ML13238A337, which contains:

ML13238A355	Cover Letter - Issuance of License Amendment No. 13 for Vogtle Units 3 and 4 (LAR 12-002).
ML13238A359	Enclosure 1 - Amendment No. 13 to COL No. NPF-91
ML13239A256	Enclosure 2 - Amendment No. 13 to COL No. NPF-92
ML13239A284	Enclosure 3 - Revised plant-specific TS pages (Attachment to Amendment No. 13)
ML13239A287	Enclosure 4 - Safety Evaluation (SE), and Attachment 1 - Acronyms
ML13239A288	SE Attachment 2 - Table A - Administrative Changes
ML13239A319	SE Attachment 3 - Table M - More Restrictive Changes
ML13239A333	SE Attachment 4 - Table R - Relocated Specifications
ML13239A331	SE Attachment 5 - Table D - Detail Removed Changes
ML13239A316	SE Attachment 6 - Table L - Less Restrictive Changes

The following documents were subsequently issued to correct an administrative error in Enclosure 3:

- | | |
|-------------|---|
| ML13277A616 | Letter - Correction To The Attachment (Replacement Pages) - Vogtle Electric Generating Plant Units 3 and 4-Issuance of Amendment Re: Technical Specifications Upgrade (LAR 12-002) (TAC No. RP9402) |
| ML13277A637 | Enclosure 3 - Revised plant-specific TS pages (Attachment to Amendment No. 13) (corrected) |
5. RAI Letter No. 01 Related to License Amendment Request (LAR) 12-002 for the Vogtle Electric Generating Plant Units 3 and 4 Combined Licenses, September 7, 2012 (ML12251A355).
 6. Southern Nuclear Operating Company, Vogtle Electric Generating Plant, Units 3 and 4, Response to Request for Additional Information Letter No. 01 Related to License Amendment Request LAR-12-002, ND-12-2015, October 04, 2012 (ML12286A363 and ML12286A360).

7. APOG-2014-008, APOG (AP1000 Utilities) Comments on AP1000 Standardized Technical Specifications (STS) Generic Technical Specification Travelers (GTSTs), Docket ID NRC-2014-0147, September 22, 2014 (ML14265A493).
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XI. MARKUP of the Applicable GTS Subsection for Preparation of the STS NUREG

The entire section of the Specifications and the Bases associated with this GTST is presented next.

Changes to the Specifications and Bases are denoted as follows: Deleted portions are marked in strikethrough red font, and inserted portions in bold blue font.

3.6 CONTAINMENT SYSTEMS

3.6.3 Containment Isolation Valves

LCO 3.6.3 Each containment isolation valve shall be OPERABLE, **except for the containment isolation valves associated with closed systems.**

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

ACTIONS

NOTES

1. Penetration flow path(s) may be unisolated intermittently under administrative controls.
2. Separate Condition entry is allowed for each penetration flow path.
3. Enter applicable Conditions and Required Actions for systems made inoperable by containment isolation valves.
4. Enter applicable Conditions and Required Actions of LCO 3.6.1, "Containment," when isolation valve leakage results in exceeding the overall containment leakage rate acceptance criteria.

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>A. NOTE Only applicable to penetration flow paths with two containment isolation valves.</p> <hr/> <p>One or more penetration flow paths with one containment isolation valve inoperable.</p>	<p>A.1 Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured.</p> <p><u>AND</u></p>	<p>4 hours</p>

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	<p>A.2</p> <p>-----NOTES-----</p> <ol style="list-style-type: none"> 1. Isolation devices in high radiation areas may be verified by use of administrative means. 2. Isolation devices that are locked, sealed, or otherwise secured may be verified by administrative means. <p>-----</p> <p>Verify the affected penetration flow path is isolated.</p>	<p>Once per 31 days for isolation devices outside containment</p> <p><u>AND</u></p> <p>Prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days for isolation devices inside containment</p>
<p>B. NOTE</p> <p>Only applicable to penetration flow paths with two containment isolation valves.</p> <p>One or more penetration flow paths with two containment isolation valves inoperable.</p>	<p>B.1</p> <p>Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, or blind flange.</p>	<p>1 hour</p>

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.6.3.1 Verify each 16 inch containment purge valve is closed, except when the 16 inch containment purge valves are open for pressure control, ALARA or air quality considerations for personnel containment entry, or for Surveillances which require the valves to be open.	31 days
SR 3.6.3.2 -----NOTE----- Valves and blind flanges in high radiation areas may be verified by use of administrative controls. ----- Verify each containment isolation manual valve and blind flange that is located outside containment and not locked, sealed, or otherwise secured and required to be closed during accident conditions is closed, except for containment isolation valves that are open under administrative controls.	31 days
SR 3.6.3.3 -----NOTE----- Valves and blind flanges in high radiation areas may be verified by use of administrative controls. ----- Verify each containment isolation manual valve and blind flange that is located inside containment and not locked, sealed, or otherwise secured and required to be closed during accident conditions is closed, except for containment isolation valves that are open under administrative controls.	Prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days
SR 3.6.3.4 Verify the isolation time of each automatic power operated containment isolation valve is within limits.	In accordance with the Inservice Testing Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
SR 3.6.3.5 Verify each automatic containment isolation valve that is not locked, sealed or otherwise secured in position, actuates to the isolation position on an actual or simulated actuation signal.	24 months

B 3.6 CONTAINMENT SYSTEMS

B 3.6.3 Containment Isolation Valves

BASES

BACKGROUND

The containment isolation valves form part of the containment pressure boundary and provide a means for fluid penetrations not serving accident consequence limiting systems to be provided with two isolation barriers. These isolation devices are either passive or active (automatic). Manual valves, de-activated automatic valves secured in their closed position (including check valves with flow through the valve secured), blind flanges, and closed systems are considered passive devices. Check valves, or other automatic valves designed to close without operator action following an accident, are considered active devices. Two barriers in series are provided for each penetration so that no single credible failure or malfunction of an active component can result in a loss of isolation or leakage that exceeds limits assumed in the safety analyses. One of these barriers may be a closed system. These barriers (typically containment isolation valves) make up the Containment Isolation System.

Automatic isolation signals are produced during accident conditions. **FSAR** Section 6.2 (Ref. 1) identifies parameters which initiate isolation signal generation for containment isolation valves. The containment isolation valves (and blind flanges) help ensure that the containment atmosphere will be isolated from the environment in the event of a release of fission product radioactivity to the containment atmosphere as a result of a Design Basis Accident (DBA).

The OPERABILITY requirements for containment isolation valves help ensure that containment is isolated within the time limits assumed in the safety analysis. Therefore, the OPERABILITY requirements provide assurance that containment function assumed in the safety analysis will be maintained.

Containment Air Filtration System 16-inch purge valves

The Containment Air Filtration System operates to:

- a. Supply outside air into the containment for ventilation and cooling or heating,
- b. Reduce the concentration of noble gases within containment prior to and during personnel access, and

BASES

BACKGROUND (continued)

- c. Equalize internal and external pressures.

Since the valves used in the Containment Air Filtration System are designed to meet the requirements for automatic containment isolation valves, these valves may be opened as needed in MODES 1, 2, 3 and 4.

**APPLICABLE
SAFETY ANALYSES**

The containment isolation valve LCO was derived from the assumptions related to minimizing the loss of reactor coolant inventory and establishing the containment boundary during major accidents. As part of the containment boundary, containment isolation valve OPERABILITY supports leak tightness of the containment. Therefore, the safety analysis of any event requiring isolation of containment is applicable to this LCO.

The DBAs that result in a release of radioactive material within containment are a loss of coolant accident (LOCA) and a rod ejection accident (Ref. 2). In the analyses for each of the accidents, it is assumed that containment isolation valves are either closed or function to close within the required isolation time following event initiation. This ensures that potential paths to the environment through containment isolation valves (including containment purge valves) are minimized.

The DBA dose analysis assumes that, following containment isolation signal generation, the containment purge isolation valves are closed within 10 seconds. The remainder of the automatic isolation valves are assumed closed and the containment leakage is terminated except for the design leakage rate, L_a . Since the containment isolation valves are powered from the 1E division batteries no diesel generator startup time is applied.

The single failure criterion required to be imposed in the conduct of plant safety analyses was considered in the design of the containment purge isolation valves. Two valves in series on each purge line provide assurance that both the supply and exhaust lines could be isolated even if a single failure occurred. The inboard and outboard isolation valves on each line are pneumatically operated, spring closed valves that fail in the closed position and are provided with power via independent sources.

The containment isolation valves satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

BASES

LCO

Containment isolation valves form a part of the containment boundary. The containment isolation valves' safety function is related to minimizing the loss of reactor coolant inventory and establishing the containment boundary during a DBA.

The automatic power operated isolation valves are required to have isolation times within limits and to actuate on an automatic isolation signal. The valves covered by this LCO are listed along with their associated stroke times in the **FSAR** Section 6.2 (Ref. 1).

The normally closed isolation valves are considered OPERABLE when manual valves are closed, automatic valves are de-activated and secured in their closed position, or blind flanges are in place ~~and closed systems are intact~~. These passive isolation valves/devices are those listed in Reference 1.

This LCO provides assurance that the containment isolation valves, **except for the closed system valves**, and purge valves will perform their designed safety functions to minimize the loss of reactor coolant inventory and establish the containment boundary during accidents. **The containment isolation valves associated with closed systems are not included in this LCO since they are covered in LCO 3.7.2, "Main Steam Line Flow Path Isolation Valves," LCO 3.7.3, "Main Feedwater Isolation Valves (MFIVs) and Main Feedwater Control Valves (MFCVs)," LCO 3.7.7, "Startup Feedwater Isolation and Control Valves," and LCO 3.7.10, "Steam Generator (SG) Isolation Valves."**

APPLICABILITY

In MODES 1, 2, 3, and 4 a DBA could cause a release of radioactive material to containment. In MODES 5 and 6, the probability and consequences of these events are reduced due to the pressure and temperature limitations of these MODES. Therefore, containment isolation valves are not required to be OPERABLE in MODES 5 and 6 to prevent leakage of radioactive material from containment. However, containment closure capability is required in MODES 5 and 6. The requirements for containment isolation valves during MODES 5 and 6 are addressed in LCO 3.6.87, "Containment Penetrations."

ACTIONS

The ACTIONS are modified by a Note allowing containment penetration flow paths to be unisolated intermittently under administrative control. These administrative controls consist of stationing a dedicated operator at the valve controls, who is in continuous communication with the control

BASES

ACTIONS (continued)

room. In this way, the penetration can be rapidly isolated when a need for containment isolation is indicated.

A second Note has been added to provide clarification that, for this LCO, separate Condition entry is allowed for each penetration flow path. This is acceptable, since the Required Actions for each Condition provide appropriate compensatory actions for each inoperable containment isolation valve. Complying with the Required Actions may allow for continued operation, and subsequent inoperable containment isolation valves are governed by subsequent Condition entry and application of associated Required Actions.

The ACTIONS are further modified by a third Note, which ensures appropriate remedial actions are taken, if necessary, if the affected systems are rendered inoperable by an inoperable containment isolation valve.

In the event that the containment isolation valve leakage results in exceeding the overall containment leakage rate, Note 4 directs entry into the applicable Conditions and Required Actions of LCO 3.6.1.

A.1 and A.2

In the event one containment isolation valve in one or more penetration flow paths is inoperable the affected penetration flow path must be isolated. The method of isolation must include the use of at least one isolation barrier that cannot be adversely affected by a single active failure. Isolation barriers that meet this criterion are a closed and de-activated automatic containment isolation valve, a closed manual valve, a blind flange, or a check valve with flow through the valve secured. For a penetration flow path isolated in accordance with Required Action A.1, the device used to isolate the penetration should be the closest available one to containment. Required Action A.1 must be completed within 4 hours. The 4 hour Completion Time is reasonable considering the time required to isolate the penetration, the relative importance of supporting containment OPERABILITY during MODES 1, 2, 3, and 4, and the availability of a second barrier.

For affected penetrations that cannot be restored to OPERABLE status within the 4 hour Completion Time and have been isolated in accordance with Required Action A.1, the affected penetrations must be verified to be isolated on a periodic basis. This is necessary to ensure that containment penetrations that are required to be isolated following an

BASES

ACTIONS (continued)

accident and that are no longer capable of being automatically isolated, will be in the isolation position should an event occur. This Required Action does not require any testing or **valve device** manipulation. Rather, it involves verification, ~~through a system walkdown,~~ that those isolation devices outside containment and capable of ~~potentially~~ being mispositioned are in the correct position. The Completion Time of “once per 31 days for isolation devices outside containment” is appropriate considering the fact that the devices are operated under administrative controls and the probability of their misalignment is low. For the isolation devices inside containment, the time period specified as “prior to entering MODE 4 from MODE 5, if not performed within the previous 92 days,” is based on engineering judgment and is considered reasonable in view of the inaccessibility of the isolation devices and other administrative controls that will ensure that isolation device misalignment is an unlikely possibility.

~~Condition A has been modified by a Note indicating that this Condition is only applicable to those penetration flow paths with two containment isolation valves. For penetration flow paths with one containment isolation valve and a closed system, Condition C provides the appropriate actions.~~

Required Action A.2 is modified by two Notes. Note 1 applies to isolation devices located in high-radiation areas, and allows these devices to be verified closed by use of administrative means. Allowing verification by administrative means is considered acceptable, since access to these areas is typically restricted. Note 2 applies to isolation devices that are locked, sealed, or otherwise secured in position and allows these devices to be verified closed by use of administrative means. Allowing verification by administrative means is considered acceptable, since the function of locking, sealing, or securing components is to ensure that these devices are not inadvertently repositioned. Therefore, the probability of misalignment of these valves once they have been verified to be in the proper position, is small.

B.1

With two containment isolation valves in one or more penetration flow paths inoperable, the affected penetration flow path must be isolated within 1 hour. The method of isolation must include the use of at least one isolation barrier that cannot be adversely affected by a single active failure. Isolation barriers that meet this criterion are a closed and deactivated automatic valve, a closed manual valve and a blind flange.

BASES

ACTIONS (continued)

The 1 hour Completion Time is consistent with the ACTIONS of LCO 3.6.1. In the event the affected penetration is isolated in accordance with Required Action B.1, the affected penetration must be verified to be isolated on a periodic basis per Required Action A.2 which remains in effect. This periodic verification is necessary to ensure leak tightness of containment and that penetrations requiring isolation following an accident are isolated. The Completion Time of once per 31 days for verifying each affected penetration flow path is isolated is appropriate considering the fact that the valves are operated under administrative control and the probability of their misalignment is low.

~~Condition B is modified by a Note indicating this Condition is only applicable to penetration flow paths with two isolation valves. Condition A of this LCO addresses the condition of one containment isolation valve inoperable in this type of penetration flow path.~~

~~C.1 and C.2~~

~~With one or more penetration flow paths with one containment isolation valve inoperable, the inoperable valve flow path must be restored to OPERABLE status or the affected penetration must be isolated. The method of isolation must include the use of at least one isolation barrier that cannot be adversely affected by a single active failure. Isolation barriers that meet this criterion are a closed and deactivated automatic valve, a closed manual valve, and a blind flange. A check valve may not be used to isolate the affected penetration flow path. Required Action C.1 must be completed within the 72 hour Completion Time. The specified time period is reasonable considering the relative stability of the closed system (hence, reliability) to act as a penetration isolation boundary and the relative importance of maintaining containment integrity during MODES 1, 2, 3, and 4. In the event that the affected penetration is isolated in accordance with Required Action C.1, the affected penetration must be verified to be isolated on a periodic basis. This periodic verification is necessary to assure leak tightness of containment and that containment penetrations requiring isolation following an accident are isolated. The Completion Time of once per 31 days for verifying that each affected penetration flow path is isolated is appropriate because the valves are operated under administrative controls and the probability of their misalignment is low.~~

BASES

ACTIONS (continued)

~~Condition C is modified by a Note indicating that this Condition is only applicable to penetration flow paths with only one containment isolation valve and a closed system. The closed system must meet the requirements of Ref. 4. This Note is necessary since this Condition is written to specifically address those penetration flow paths in a closed system.~~

~~Required Action C.2 is modified by two Notes. Note 1 applies to valves and blind flanges located in high radiation areas, and allows these devices to be verified closed by use of administrative controls. Allowing verification by administrative controls is considered acceptable, since access to these areas is typically restricted. Note 2 applies to isolation devices that are locked, sealed, or otherwise secured in position and allows these devices to be verified closed by use of administrative means. Allowing verification by administrative means is considered acceptable, since the function of locking, sealing, or securing components is to ensure that these devices are not inadvertently repositioned. Therefore, the probability of misalignment of these valves, once they have been verified to be in the proper position, is small.~~

DC.1 and DC.2

If the Required Actions and associated Completion Times are not met, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE
REQUIREMENTSSR 3.6.3.1

This SR ensures that the 16 inch purge valves are closed as required or, if open, open for an allowable reason. If a purge valve is open in violation of this SR, the valve is considered inoperable. If the inoperable valve is not otherwise known to have excessive leakage when closed, it is not considered to have leakage outside of limits. The SR is not required to be met when the 16 inch purge valves are open for the reasons stated. The valves may be opened for pressure control, ALARA or air quality considerations for personnel entry, or for Surveillances that require the valves to be open. The 16 inch purge valves are capable of

BASES

SURVEILLANCE REQUIREMENTS (continued)

closing in the environment following a LOCA. Therefore, these valves are allowed to be open for limited periods of time. The 31 day Frequency is consistent with other containment isolation valve requirements discussed in SR 3.6.3.2.

SR 3.6.3.2

This SR requires verification that each containment isolation manual valve and blind flange located outside containment and not locked, sealed, or otherwise secured 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 of the containment boundary is within design limits. This SR does not require any testing or valve manipulation. Rather, it involves verification, ~~through a system walkdown,~~ that those **containment isolation** valves outside containment and capable of being mispositioned are in the correct position. Since verification of valve position for **containment isolation** valves outside containment is relatively easy, the 31 day Frequency is based on engineering judgment and was chosen to provide added assurance of the correct positions. The SR specifies that containment isolation valves that are open under administrative controls are not required to meet the SR during the time the valves are open. This SR does not apply to valves that are locked, sealed, or otherwise secured in the closed position, since these were verified to be in the correct position upon locking, sealing, or securing.

The Note applies to valves and blind flanges located in high radiation areas and allows these devices to be verified closed by administrative means. Allowing verification by administrative means is considered acceptable, since access to these areas is typically restricted during MODES 1, 2, 3, and 4 for ALARA reasons. Therefore, the probability of misalignment of these containment isolation valves, once they have been verified to be in the proper position, is small.

SR 3.6.3.3

This SR requires verification that each containment isolation manual valve and blind flange located inside containment and not locked, sealed, or otherwise secured 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 of the containment boundary is within design limits. For containment isolation valves inside containment,

BASES

SURVEILLANCE REQUIREMENTS (continued)

the Frequency specified as “prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days” is appropriate since these containment isolation valves are operated under administrative control and the probability of their misalignment is low. The SR specifies that containment isolation valves that are open under administrative controls are not required to meet the SR during the time they are open. This SR does not apply to valves that are locked, sealed, or otherwise secured in the closed position, since these were verified to be in the correct position upon locking, sealing, or securing.

~~This~~**The** Note allows valves and blind flanges located in high radiation areas to be verified closed by use of administrative controls. Allowing verification by administrative controls is considered acceptable, since access to these areas is typically restricted during MODES 1, 2, 3, and 4 for ALARA reasons. Therefore, the probability of misalignment of these containment isolation valves, once they have been verified to be in the proper position, is small.

SR 3.6.3.4

Verifying that the isolation time of each automatic power operated containment isolation valve is within limits is required to demonstrate OPERABILITY. The isolation time test ensures that the valve will isolate in a time period less than or equal to that assumed in the safety analysis. The isolation times are specified in **FSAR** Section 6.2.3 (Ref. 1) and Frequency of this SR is in accordance with the Inservice Testing Program.

SR 3.6.3.5

Automatic containment isolation valves close on **a containment** isolation signal to prevent leakage of radioactive material from containment following a DBA. This SR ensures that each automatic containment isolation valve will actuate to its isolation position on a containment isolation signal. **The ACTUATION LOGIC TEST overlaps this Surveillance to provide complete testing of the assumed safety function.** This surveillance is not required for valves that are locked, sealed, or otherwise secured in the required position under administrative controls. The 24 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown

BASES

SURVEILLANCE REQUIREMENTS (continued)

that these components usually pass this Surveillance when performed at the 24 month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

REFERENCES

1. **FSAR** Section 6.2, "Containment Systems."
 2. **FSAR** Chapter 15, "Accident Analysis."
 3. NUREG-1449, "Shutdown and Low Power Operation at Commercial Nuclear Power Plants in the United States."
 - ~~4. Standard Review Plan 6.2.4.~~
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XII. Applicable STS Subsection After Incorporation of this GTST's Modifications

The entire subsection of the Specifications and the Bases associated with this GTST, following incorporation of the modifications, is presented next.

3.6 CONTAINMENT SYSTEMS

3.6.3 Containment Isolation Valves

LCO 3.6.3 Each containment isolation valve shall be OPERABLE, except for the containment isolation valves associated with closed systems.

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

ACTIONS

-----NOTES-----

1. Penetration flow path(s) may be unisolated intermittently under administrative controls.
2. Separate Condition entry is allowed for each penetration flow path.
3. Enter applicable Conditions and Required Actions for systems made inoperable by containment isolation valves.
4. Enter applicable Conditions and Required Actions of LCO 3.6.1, "Containment," when isolation valve leakage results in exceeding the overall containment leakage rate acceptance criteria.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more penetration flow paths with one containment isolation valve inoperable.	A.1 Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured. <u>AND</u>	4 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	<p>A.2 -----NOTES-----</p> <ol style="list-style-type: none"> 1. Isolation devices in high radiation areas may be verified by use of administrative means. 2. Isolation devices that are locked, sealed, or otherwise secured may be verified by administrative means. <p>-----</p> <p>Verify the affected penetration flow path is isolated.</p>	<p>Once per 31 days for isolation devices outside containment</p> <p><u>AND</u></p> <p>Prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days for isolation devices inside containment</p>
B. One or more penetration flow paths with two containment isolation valves inoperable.	B.1 Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, or blind flange.	1 hour
C. Required Action and associated Completion Time not met.	C.1 Be in MODE 3. <u>AND</u>	6 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. (continued)	C.2 Be in MODE 5.	36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.6.3.1 Verify each 16 inch containment purge valve is closed, except when the 16 inch containment purge valves are open for pressure control, ALARA or air quality considerations for personnel entry, or for Surveillances which require the valves to be open.	31 days
SR 3.6.3.2 -----NOTE----- Valves and blind flanges in high radiation areas may be verified by use of administrative controls. ----- Verify each containment isolation manual valve and blind flange that is located outside containment and not locked, sealed, or otherwise secured and required to be closed during accident conditions is closed, except for containment isolation valves that are open under administrative controls.	31 days

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.6.3.3 -----NOTE----- Valves and blind flanges in high radiation areas may be verified by use of administrative controls. -----</p> <p>Verify each containment isolation manual valve and blind flange that is located inside containment and not locked, sealed, or otherwise secured and required to be closed during accident conditions is closed, except for containment isolation valves that are open under administrative controls.</p>	<p>Prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days</p>
<p>SR 3.6.3.4 Verify the isolation time of each automatic power operated containment isolation valve is within limits.</p>	<p>In accordance with the Inservice Testing Program</p>
<p>SR 3.6.3.5 Verify each automatic containment isolation valve that is not locked, sealed or otherwise secured in position, actuates to the isolation position on an actual or simulated actuation signal.</p>	<p>24 months</p>

B 3.6 CONTAINMENT SYSTEMS

B 3.6.3 Containment Isolation Valves

BASES

BACKGROUND

The containment isolation valves form part of the containment pressure boundary and provide a means for fluid penetrations not serving accident consequence limiting systems to be provided with two isolation barriers. These isolation devices are either passive or active (automatic). Manual valves, de-activated automatic valves secured in their closed position (including check valves with flow through the valve secured), blind flanges, and closed systems are considered passive devices. Check valves, or other automatic valves designed to close without operator action following an accident, are considered active devices. Two barriers in series are provided for each penetration so that no single credible failure or malfunction of an active component can result in a loss of isolation or leakage that exceeds limits assumed in the safety analyses. One of these barriers may be a closed system. These barriers (typically containment isolation valves) make up the Containment Isolation System.

Automatic isolation signals are produced during accident conditions. FSAR Section 6.2 (Ref. 1) identifies parameters which initiate isolation signal generation for containment isolation valves. The containment isolation valves (and blind flanges) help ensure that the containment atmosphere will be isolated from the environment in the event of a release of fission product radioactivity to the containment atmosphere as a result of a Design Basis Accident (DBA).

The OPERABILITY requirements for containment isolation valves help ensure that containment is isolated within the time limits assumed in the safety analysis. Therefore, the OPERABILITY requirements provide assurance that containment function assumed in the safety analysis will be maintained.

Containment Air Filtration System 16-inch purge valves

The Containment Air Filtration System operates to:

- a. Supply outside air into the containment for ventilation and cooling or heating,
- b. Reduce the concentration of noble gases within containment prior to and during personnel access, and

BASES

BACKGROUND (continued)

- c. Equalize internal and external pressures.

Since the valves used in the Containment Air Filtration System are designed to meet the requirements for automatic containment isolation valves, these valves may be opened as needed in MODES 1, 2, 3 and 4.

**APPLICABLE
SAFETY ANALYSES**

The containment isolation valve LCO was derived from the assumptions related to minimizing the loss of reactor coolant inventory and establishing the containment boundary during major accidents. As part of the containment boundary, containment isolation valve OPERABILITY supports leak tightness of the containment. Therefore, the safety analysis of any event requiring isolation of containment is applicable to this LCO.

The DBAs that result in a release of radioactive material within containment are a loss of coolant accident (LOCA) and a rod ejection accident (Ref. 2). In the analyses for each of the accidents, it is assumed that containment isolation valves are either closed or function to close within the required isolation time following event initiation. This ensures that potential paths to the environment through containment isolation valves (including containment purge valves) are minimized.

The DBA dose analysis assumes that, following containment isolation signal generation, the containment purge isolation valves are closed within 10 seconds. The remainder of the automatic isolation valves are assumed closed and the containment leakage is terminated except for the design leakage rate, L_a . Since the containment isolation valves are powered from the 1E division batteries no diesel generator startup time is applied.

The single failure criterion required to be imposed in the conduct of plant safety analyses was considered in the design of the containment purge isolation valves. Two valves in series on each purge line provide assurance that both the supply and exhaust lines could be isolated even if a single failure occurred. The inboard and outboard isolation valves on each line are pneumatically operated, spring closed valves that fail in the closed position and are provided with power via independent sources.

The containment isolation valves satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

BASES

LCO	<p>Containment isolation valves form a part of the containment boundary. The containment isolation valves' safety function is related to minimizing the loss of reactor coolant inventory and establishing the containment boundary during a DBA.</p> <p>The automatic power operated isolation valves are required to have isolation times within limits and to actuate on an automatic isolation signal. The valves covered by this LCO are listed along with their associated stroke times in the FSAR Section 6.2 (Ref. 1).</p> <p>The normally closed isolation valves are considered OPERABLE when manual valves are closed, automatic valves are de-activated and secured in their closed position, or blind flanges are in place. These passive isolation valves/devices are those listed in Reference 1.</p> <p>This LCO provides assurance that the containment isolation valves, except for the closed system valves, and purge valves will perform their designed safety functions to minimize the loss of reactor coolant inventory and establish the containment boundary during accidents. The containment isolation valves associated with closed systems are not included in this LCO since they are covered in LCO 3.7.2, "Main Steam Line Flow Path Isolation Valves," LCO 3.7.3, "Main Feedwater Isolation Valves (MFIVs) and Main Feedwater Control Valves (MFCVs)," LCO 3.7.7, "Startup Feedwater Isolation and Control Valves," and LCO 3.7.10, "Steam Generator (SG) Isolation Valves."</p>
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APPLICABILITY	<p>In MODES 1, 2, 3, and 4 a DBA could cause a release of radioactive material to containment. In MODES 5 and 6, the probability and consequences of these events are reduced due to the pressure and temperature limitations of these MODES. Therefore, containment isolation valves are not required to be OPERABLE in MODES 5 and 6 to prevent leakage of radioactive material from containment. However, containment closure capability is required in MODES 5 and 6. The requirements for containment isolation valves during MODES 5 and 6 are addressed in LCO 3.6.7, "Containment Penetrations."</p>
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ACTIONS	<p>The ACTIONS are modified by a Note allowing containment penetration flow paths to be unisolated intermittently under administrative control. These administrative controls consist of stationing a dedicated operator at the valve controls, who is in continuous communication with the control room. In this way, the penetration can be rapidly isolated when a need for containment isolation is indicated.</p>
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BASES

ACTIONS (continued)

A second Note has been added to provide clarification that, for this LCO, separate Condition entry is allowed for each penetration flow path. This is acceptable, since the Required Actions for each Condition provide appropriate compensatory actions for each inoperable containment isolation valve. Complying with the Required Actions may allow for continued operation, and subsequent inoperable containment isolation valves are governed by subsequent Condition entry and application of associated Required Actions.

The ACTIONS are further modified by a third Note, which ensures appropriate remedial actions are taken, if necessary, if the affected systems are rendered inoperable by an inoperable containment isolation valve.

In the event that the containment isolation valve leakage results in exceeding the overall containment leakage rate, Note 4 directs entry into the applicable Conditions and Required Actions of LCO 3.6.1.

A.1 and A.2

In the event one containment isolation valve in one or more penetration flow paths is inoperable the affected penetration flow path must be isolated. The method of isolation must include the use of at least one isolation barrier that cannot be adversely affected by a single active failure. Isolation barriers that meet this criterion are a closed and deactivated automatic containment isolation valve, a closed manual valve, a blind flange, or a check valve with flow through the valve secured. For a penetration flow path isolated in accordance with Required Action A.1, the device used to isolate the penetration should be the closest available one to containment. Required Action A.1 must be completed within 4 hours. The 4 hour Completion Time is reasonable considering the time required to isolate the penetration, the relative importance of supporting containment OPERABILITY during MODES 1, 2, 3, and 4, and the availability of a second barrier.

For affected penetrations that cannot be restored to OPERABLE status within the 4 hour Completion Time and have been isolated in accordance with Required Action A.1, the affected penetrations must be verified to be isolated on a periodic basis. This is necessary to ensure that containment penetrations that are required to be isolated following an accident and that are no longer capable of being automatically isolated, will be in the isolation position should an event occur. This Required

BASES

ACTIONS (continued)

Action does not require any testing or device manipulation. Rather, it involves verification that those isolation devices outside containment and capable of being mispositioned are in the correct position. The Completion Time of “once per 31 days for isolation devices outside containment” is appropriate considering the fact that the devices are operated under administrative controls and the probability of their misalignment is low. For the isolation devices inside containment, the time period specified as “prior to entering MODE 4 from MODE 5, if not performed within the previous 92 days,” is based on engineering judgment and is considered reasonable in view of the inaccessibility of the isolation devices and other administrative controls that will ensure that isolation device misalignment is an unlikely possibility.

Required Action A.2 is modified by two Notes. Note 1 applies to isolation devices located in high-radiation areas, and allows these devices to be verified closed by use of administrative means. Allowing verification by administrative means is considered acceptable, since access to these areas is typically restricted. Note 2 applies to isolation devices that are locked, sealed, or otherwise secured in position and allows these devices to be verified closed by use of administrative means. Allowing verification by administrative means is considered acceptable, since the function of locking, sealing, or securing components is to ensure that these devices are not inadvertently repositioned. Therefore, the probability of misalignment of these valves once they have been verified to be in the proper position, is small.

B.1

With two containment isolation valves in one or more penetration flow paths inoperable, the affected penetration flow path must be isolated within 1 hour. The method of isolation must include the use of at least one isolation barrier that cannot be adversely affected by a single active failure. Isolation barriers that meet this criterion are a closed and deactivated automatic valve, a closed manual valve and a blind flange. The 1 hour Completion Time is consistent with the ACTIONS of LCO 3.6.1. In the event the affected penetration is isolated in accordance with Required Action B.1, the affected penetration must be verified to be isolated on a periodic basis per Required Action A.2 which remains in effect. This periodic verification is necessary to ensure leak tightness of containment and that penetrations requiring isolation following an accident are isolated. The Completion Time of once per 31 days for verifying each affected penetration flow path is isolated is

BASES

ACTIONS (continued)

appropriate considering the fact that the valves are operated under administrative control and the probability of their misalignment is low.

C.1 and C.2

If the Required Actions and associated Completion Times are not met, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE
REQUIREMENTSSR 3.6.3.1

This SR ensures that the 16 inch purge valves are closed as required or, if open, open for an allowable reason. If a purge valve is open in violation of this SR, the valve is considered inoperable. If the inoperable valve is not otherwise known to have excessive leakage when closed, it is not considered to have leakage outside of limits. The SR is not required to be met when the 16 inch purge valves are open for the reasons stated. The valves may be opened for pressure control, ALARA or air quality considerations for personnel entry, or for Surveillances that require the valves to be open. The 16 inch purge valves are capable of closing in the environment following a LOCA. Therefore, these valves are allowed to be open for limited periods of time. The 31 day Frequency is consistent with other containment isolation valve requirements discussed in SR 3.6.3.2.

SR 3.6.3.2

This SR requires verification that each containment isolation manual valve and blind flange located outside containment and not locked, sealed, or otherwise secured 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 of the containment boundary is within design limits. This SR does not require any testing or valve manipulation. Rather, it involves verification that those containment isolation valves outside containment and capable of being mispositioned are in the correct position. Since verification of valve position for containment isolation valves outside containment is relatively easy, the

BASES

SURVEILLANCE REQUIREMENTS (continued)

31 day Frequency is based on engineering judgment and was chosen to provide added assurance of the correct positions. The SR specifies that containment isolation valves that are open under administrative controls are not required to meet the SR during the time the valves are open. This SR does not apply to valves that are locked, sealed, or otherwise secured in the closed position, since these were verified to be in the correct position upon locking, sealing, or securing.

The Note applies to valves and blind flanges located in high radiation areas and allows these devices to be verified closed by administrative means. Allowing verification by administrative means is considered acceptable, since access to these areas is typically restricted during MODES 1, 2, 3, and 4 for ALARA reasons. Therefore, the probability of misalignment of these containment isolation valves, once they have been verified to be in the proper position, is small.

SR 3.6.3.3

This SR requires verification that each containment isolation manual valve and blind flange located inside containment and not locked, sealed, or otherwise secured 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 of the containment boundary is within design limits. For containment isolation valves inside containment, the Frequency specified as "prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days" is appropriate since these containment isolation valves are operated under administrative control and the probability of their misalignment is low. The SR specifies that containment isolation valves that are open under administrative controls are not required to meet the SR during the time they are open. This SR does not apply to valves that are locked, sealed, or otherwise secured in the closed position, since these were verified to be in the correct position upon locking, sealing, or securing.

The Note allows valves and blind flanges located in high radiation areas to be verified closed by use of administrative controls. Allowing verification by administrative controls is considered acceptable, since access to these areas is typically restricted during MODES 1, 2, 3, and 4 for ALARA reasons. Therefore, the probability of misalignment of these containment isolation valves, once they have been verified to be in the proper position, is small.

BASES

SURVEILLANCE REQUIREMENTS (continued)SR 3.6.3.4

Verifying that the isolation time of each automatic power operated containment isolation valve is within limits is required to demonstrate OPERABILITY. The isolation time test ensures that the valve will isolate in a time period less than or equal to that assumed in the safety analysis. The isolation times are specified in FSAR Section 6.2.3 (Ref. 1) and Frequency of this SR is in accordance with the Inservice Testing Program.

SR 3.6.3.5

Automatic containment isolation valves close on a containment isolation signal to prevent leakage of radioactive material from containment following a DBA. This SR ensures that each automatic containment isolation valve will actuate to its isolation position on a containment isolation signal. The ACTUATION LOGIC TEST overlaps this Surveillance to provide complete testing of the assumed safety function. This surveillance is not required for valves that are locked, sealed, or otherwise secured in the required position under administrative controls. The 24 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown that these components usually pass this Surveillance when performed at the 24 month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

REFERENCES

1. FSAR Section 6.2, "Containment Systems."
 2. FSAR Chapter 15, "Accident Analysis."
 3. NUREG-1449, "Shutdown and Low Power Operation at Commercial Nuclear Power Plants in the United States."
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