

10 CFR 50.90

NMP1L3584

June 13, 2024

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Nine Mile Point Nuclear Station, Unit 1
Renewed Facility Operating License No. DPR-63
NRC Docket No. 50-220

Subject: License Amendment Request to Revise Technical Specifications to Adopt TSTF-230, Revision 1, "Add New Condition B to LCO 3.6.2.3, 'RHR Suppression Pool Cooling.' "

Pursuant to 10 CFR 50.90, "Application for amendment of license or construction permit, or early site permit," Constellation Energy Generation, LLC (CEG) is requesting approval for proposed changes to the Technical Specifications (TS), Appendix A of Renewed Facility Operating License No. DPR-63 for Nine Mile Point Nuclear Station, Unit 1 (NMP1).

The proposed change is consistent with NRC-approved Technical Specification Task Force (TSTF) Traveler 230, Revision 1, "Add New Condition B to LCO 3.6.2.3, RHR Suppression Pool Cooling" (ADAMS Accession No. ML040570110) for plants with improved Standard Technical Specifications (ITS). NMP1 does not have a residual heat removal system or ITS; therefore, the applicable LCO for NMP1 is Specification 3.3.7, Containment Spray System.

This request is subdivided as follows:

- Attachment 1 provides a description and assessment of the proposed changes, the requested confirmation of applicability, and plant-specific technical variations.
- Attachment 2 provides the existing TS pages marked up to show the proposed changes.
- Attachment 3 provides the existing TS Bases pages marked up to show the proposed changes and is provided for information only.

These proposed changes have been reviewed and approved by the site's Plant Operations Review Committee in accordance with the requirements of the CEG Quality Assurance Program.

CEG requests approval of the proposed amendment by June 16, 2025. The amendment shall be implemented within 60 days following NRC approval. This implementation period will provide adequate time for the affected station documents to be revised using the appropriate change control mechanisms.

License Amendment Request
Adopt TSTF-230, Revision 1
Docket No. 50-220
June 13, 2024
Page 2

In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," paragraph (a)(1), the analysis about the issue of no significant hazards consideration using the standards in 10 CFR 50.92 is being provided to the Commission.

In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," paragraph (b), CEG is notifying the State of New York of this application for license amendment by transmitting a copy of this letter and its attachments to the designated State Officials.

There are no regulatory commitments contained in this letter. Should you have any questions concerning this submittal, please contact Ron Reynolds at 267-533-5698.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 13th day of June 2024.

Respectfully,



David T. Gudger
Senior Manager - Licensing
Constellation Energy Generation, LLC

Attachments:

1. Description and Assessment
2. Proposed Technical Specification Changes (Mark-Ups)
3. Proposed Technical Specification Bases Changes (Mark-Ups)
(For Information Only)

cc:	USNRC Region I, Regional Administrator	w/ attachments
	USNRC Project Manager, NMP	"
	USNRC Senior Resident Inspector, NMP	"
	A. L. Peterson, NYSERDA	"
	B. Frymire, NYSPSC	"
	C. Chapin, NYSPSC	"

ATTACHMENT 1
Description and Assessment

- 1.0 SUMMARY DESCRIPTION
- 2.0 DETAILED DESCRIPTION
- 3.0 TECHNICAL EVALUATION
- 4.0 REGULATORY EVALUATION
 - 4.1 Applicable Regulatory Requirements/Criteria
 - 4.2 Precedent
 - 4.3 No Significant Hazards Consideration
 - 4.4 Conclusions
- 5.0 ENVIRONMENTAL CONSIDERATION
- 6.0 REFERENCES

1.0 SUMMARY DESCRIPTION

Pursuant to 10 CFR 50.90, "Application for amendment of license or construction permit, or early site permit," Constellation Energy Generation, LLC (CEG), proposes changes to the Technical Specifications (TS), Appendix A of Renewed Facility Operating License No. DPR-63 for Nine Mile Point Nuclear Station, Unit 1 (NMP1).

The proposed change meets the intent of NRC-approved Technical Specification Task Force (TSTF) Traveler 230, Revision 1, "Add New Condition B to LCO 3.6.2.3, RHR Suppression Pool Cooling" (Reference 1). This TSTF modifies improved Technical Specifications (ITS) 3.6.2.3, "Residual Heat Removal (RHR) Suppression Pool Cooling," to allow two RHR suppression pool cooling subsystems to be inoperable for eight hours. NMP1 does not have ITS; therefore, the applicable Limiting Condition for Operation (LCO) for NMP1 is Specification 3.3.7, Containment Spray System. The difference in the NMP1 TS 3.3.7 to ITS 3.6.2.3 is described as a variation to TSTF-230, Revision 1, in Section 2.1 below.

2.0 DETAILED DESCRIPTION

NMP1 TS LCO 3.3.7, Containment Spray System (CSS), currently requires each of the two independent CSS to be operable. Specification 3.3.7.e states that if both CSSs become inoperable the reactor shall be in the cold shutdown condition within 10 hours. The proposed change will revise Specification 3.3.7.e to state that if both containment spray systems become inoperable, or if one containment spray system and one subsystem in the opposite loop become inoperable, the reactor may remain in operation for a period not to exceed 8 hours. Also, a new Specification 3.3.7.f will be added that will direct operators to place the unit in Shutdown Condition-Hot within 12 hours and Shutdown Condition-Cold in 36 hours if applicable specifications are not met. In addition, Specification 3.3.7.a will be revised for clarity. See Attachment 2 for NMP1 TS markups.

2.1 Optional Changes and Variations

The proposed amendment meets the intent of the ITS changes described in TSTF-230, Revision 1. The changes provided in TSTF-230, Revision 1, are based on NUREG-1433, "Standard Technical Specifications General Electric BWR/4 Plants," or NUREG-1434, "Standard Technical Specifications General Electric BWR/6 Plants." NMP1 is a BWR/2 design. Based on plant design, system descriptions, and formatting of the NMP1 TS, very little is the same as the ITS described in TSTF-230, Revision 1. Therefore, CEG proposes variations or deviations from TSTF-230, Revision 1, as identified below.

1. The NMP1 Reactor Operating Conditions are different than the ITS. The ITS terminology of Modes is not used in the NMP1 TS. The table below compares the technical variation of ITS and NMP1 Reactor Operating Conditions.

ITS Mode	NMP1 TS Reactor Operating Condition
1 - Power Operation	Power Operating Condition
2 - Startup	
3 - Hot Shutdown (>200°F)	Shutdown Condition – Hot (>212°F)
4 - Cold Shutdown (≤200°F)	Shutdown Condition – Cold (≤212°F)
5 - Refueling	Refueling Condition
No Mode	Major Maintenance Condition (defueled)

2. NMP1 TS do not have ITS LCO 3.6.2.3, RHR Suppression Pool Cooling, specification. Instead, NMP1 TS uses a Containment Spray System (CSS) for suppression pool (torus) cooling. The NMP1 TS LCO for CSS is 3.3.7. The CSS function provides the same as the RHR system in that it is designed to prevent overheating and over pressurization of the containment, reduce drywell airborne fission product concentrations, and control the pressure suppression chamber water temperature following a design basis LOCA. The system is designed to provide heat removal capabilities for vessel leaks up to and including the Design Basis Accident (DBA), the double-ended break of a reactor recirculation line, without core spray system operation. Although this is a technical variation from TSTF-230, Revision 1, the intent of the proposed change applies to the NMP1 TS and is acceptable.

3. NMP1 LCO 3.3.7, Specification e, currently states, in part, "If both containment spray systems become inoperable the reactor shall be in the cold shutdown condition within 10 hours." TSTF-230, Revision 1, adds ITS LCO 3.6.2.3, Condition B, Two RHR suppression pool cooling subsystems inoperable, with a Required Action to restore one RHR suppression pool cooling subsystem to operable status in 8 hours. In addition, the TSTF revised Condition C to state, if Required Action and associated Completion Time is not met to be in MODE 3 in 12 hours and MODE 4 in 36 hours. NMP1s intention is to adopt TSTF-230, Revision 1, as it pertains to the NMP1 CSS design. The NMP1 CSS design includes two loops with each loop containing two suction headers, two containment spray pumps, two heat exchangers and the associated containment spray raw water pumps, a common test return line, and associated piping and control valves. All four containment spray pumps are cross connected and any two provide sufficient capability to remove heat, reduce pressure, and restore the containment pressure suppression system temperature following a LOCA. Therefore, the current NMP1, Specification e, will be separated into two Specifications. Specification e will be revised to state, "If both containment spray systems become inoperable, or if one containment spray system and one subsystem in the opposite loop become inoperable, the reactor may remain in operation for a period not to exceed 8 hours. A new Specification f will be created to allow for the plant to be in Shutdown Condition-Hot within 12 hours and Shutdown Condition-Cold within 36 hours if Specifications a, b, c, d, or e, are not met. Specification f follows the plant shutdown sequence outlined in TSTF-203, Revision 1, Condition C. In addition, Specification 3.3.7.a will be revised to clarify exceptions. Although this proposed change is a technical variation from TSTF-230, Revision 1, it is following the current ITS methodology and applying it to the NMP1 CSS design while maintaining the NMP1 TS format. Therefore, this change is applicable to the NMP1 TS.

CEG has reviewed the above variations and determined that they do not affect the applicability of TSTF-230, Revision 1, to the NMP1 TS.

3.0 TECHNICAL EVALUATION

Two redundant CSS loops are provided to remove heat, reduce pressure, and restore the containment pressure suppression system temperature following a LOCA. Each loop is capable of removing all the decay heat and, in addition, the energy from any credible metal-water reaction at a rate that will prevent containment pressures and temperatures from exceeding their design values. The primary loop (Loop 11) provides water to the primary or inner drywell sparger and to the torus sparger. The secondary loop (Loop 12) provides water to the secondary or outer drywell sparger and to the torus sparger. The torus sparger is common to both loops. Each of the two loops are cross connected through the test return lines such that each of the loops can provide flow to both the primary and secondary spargers. Each loop includes two redundant trains and consists of two suction headers, two containment spray pumps, two heat exchangers and the associated containment spray raw water pumps, a common test return line, and associated piping and control valves. All pumps in a loop are powered from the same emergency power bus. Each loop is electrically independent from the other loop. System initiation is by two reactor protection system signals: low-low water level in the reactor and high drywell pressure. The containment spray raw water pumps must be manually initiated following automatic initiation of the containment spray pumps.

Currently, NMP1 TS 3.3.7.e requires the unit to be in Shutdown Condition-Cold within 10 hours in the event both CSS become inoperable. The proposed change would allow 8 hours to restore one CSS to operable status before initiating a unit shutdown. The proposed 8-hour limit is considered appropriate since an immediate plant shutdown, which is currently required, has the potential to result in a unit scram and discharge of steam to the Torus. With both CSS inoperable, there would be no available means to remove heat from the Torus. The 8-hour limit provides time to restore one of the CSS prior to requiring the unit to shut down yet is short enough that it does not significantly increase the time that the systems would be unavailable in the event of an accident. In addition, a new Specification (Specification f) was created to adopt the shutdown Required Actions currently in ITS LCO 3.6.2.3, Condition B, and as revised in TSTF-230, Revision 1 (see Section 2.1, Variation 3, for justification).

4.0 REGULATORY ANALYSIS

4.1 Applicable Regulatory Requirements/Criteria

- Criterion 38, Containment Heat Removal
- 10 CFR 50.36, Technical Specifications

CEG has determined that the proposed amendment is consistent with the regulatory requirements and criteria described in the above cited documents.

4.2 Precedent

An example of a plant-specific NRC approval of the changes in TSTF-230, Revision 1, is Clinton Power Station, Unit 1, Amendment No. 247, dated November 10, 2022 (Reference 2).

4.3 No Significant Hazards Consideration Determination

Pursuant to 10 CFR 50.90, "Application for amendment of license or construction permit, or early site permit," Constellation Energy Generation, LLC (CEG), proposes changes to the Technical Specifications (TS), Appendix A of Renewed Facility Operating License No. DPR-63 for Nine Mile Point Nuclear Station, Unit 1 (NMP1). The proposed change meets the intent of NRC-approved Technical Specification Task Force (TSTF) Traveler 230, Revision 1, "Add New Condition B to LCO 3.6.2.3, RHR Suppression Pool Cooling." This TSTF modifies improved Standard Technical Specifications (ITS) 3.6.2.3, "Residual Heat Removal (RHR) Suppression Pool Cooling," to allow two RHR suppression pool cooling subsystems to be inoperable for eight hours. NMP1 does not have ITS; therefore, the applicable LCO for NMP1 is Specification 3.3.7, Containment Spray System.

According to 10 CFR 50.92, "Issuance of amendment," paragraph (c), a proposed amendment to an operating license involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not:

- (1) Involve a significant increase in the probability or consequences of any accident previously evaluated; or
- (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.

Constellation Energy Generation, LLC (CEG), has evaluated the proposed changes to the TS using the criteria in 10 CFR 50.92 and has determined that the proposed changes do not involve a significant hazards consideration.

1. Do the proposed changes involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed changes relax the Specifications of LCO 3.3.7 by allowing 8 hours to restore one Containment Spray System (CSS) to operable status when both systems have been determined to be inoperable. The Specifications and associated Completion Times are not initiating conditions for any accident previously evaluated. The proposed 8-hour Completion Time provides time to restore required system(s) to operable status is short enough that operating an additional 8 hours is not a significant risk. The Required Actions in the proposed changes have been developed to provide assurance that appropriate remedial actions are taken in response to the degraded condition, considering the operability status of the CSS and the capability of minimizing the risk associated with continued operation. As a result, neither the probability nor the consequences of any accident previously evaluated are significantly increased.

Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Do the proposed changes create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed changes do not change the design, configuration, or method of operation of the plant. The proposed changes do not involve a physical alteration of the plant (no new or different kind of equipment will be installed).

Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Do the proposed changes involve a significant reduction in a margin of safety?

Response: No.

The relaxed Specification does not involve a significant reduction in a margin of safety. The proposed changes have been evaluated to minimize the risk of continued operation with both CSS inoperable. The operability status of the CSS, a reasonable time for repair or replacement of required features, and the low probability of a design basis accident occurring during the repair period have been considered in the evaluation.

Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

Based on the above, CEG concludes that the proposed changes present no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

4.4 Conclusions

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 ENVIRONMENTAL EVALUATION

CEG has determined that the proposed amendment would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, "Standards for Protection Against Radiation." However, the proposed changes do not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed changes.

6.0 REFERENCES

- 6.1 TSTF-230, Revision 1, "Add New Condition B to LCO 3.6.2.3, RHR Suppression Pool Cooling" (ADAMS Accession No. ML040570110)
- 6.2 Clinton Power Station, Unit 1 – "Issuance of Amendment No. 247 RE: Adoption of TSTF-230, Revision 1," dated November 10, 2022 (ADAMS Accession No. ML22263A473)

ATTACHMENT 2

License Amendment Request

**Nine Mile Point Nuclear Station, Unit 1
Docket No. 50-220**

**Adopt TSTF-230, Revision 1, "Add New Condition B to
LCO 3.6.2.3, 'RHR Suppression Pool Cooling.'"**

Proposed Technical Specification Changes (Mark-Ups)

TS Pages

159

160

161

LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT
<p>3.3.7 <u>CONTAINMENT SPRAY SYSTEM</u></p> <p><u>Applicability:</u></p> <p>Applies to the operating status of the containment spray system.</p> <p><u>Objective:</u></p> <p>To assure the capability of the containment spray system to limit containment pressure and temperature in the event of a loss-of-coolant accident.</p> <p><u>Specification:</u></p> <p>a. During all reactor operating conditions whenever reactor coolant temperature is greater than 215°F and fuel is in the reactor vessel and primary containment integrity is required; each of the two containment spray systems and the associated raw water cooling systems shall be operable except as specified in 3.3.7.b</p> <p>b. If a redundant component of a containment spray system becomes inoperable, Specification 3.3.7.a shall be considered fulfilled, provided that the component is returned to an operable condition within 15 days or in accordance with the Risk Informed Completion Time Program and that the additional surveillance required is performed.</p>	<p>4.3.7 <u>CONTAINMENT SPRAY SYSTEM</u></p> <p><u>Applicability:</u></p> <p>Applies to the testing of the containment spray system.</p> <p><u>Objective:</u></p> <p>To verify the operability of the containment spray system.</p> <p><u>Specification:</u></p> <p>The containment spray system surveillance shall be performed as indicated below:</p> <p>a. Containment Spray Pumps</p> <p>(1) In accordance with the Surveillance Frequency Control Program, automatic startup of the containment spray pump shall be demonstrated.</p> <p>(2) In accordance with the Surveillance Frequency Control Program, pump operability shall be checked.</p> <p>b. Nozzles</p> <p>Following maintenance that could result in nozzle blockage, a test shall be performed on the spray nozzles.</p>

, 3.3.7.c, 3.3.7.d, or 3.3.7.e.

LIMITING CONDITION FOR OPERATION

SURVEILLANCE REQUIREMENT

c. If a redundant component in each of the containment spray systems or their associated raw water systems become inoperable, both systems shall be considered operable provided that the component is returned to an operable condition within 7 days or in accordance with the Risk Informed Completion Time Program and that the additional surveillance required is performed.

d. If a containment spray system or its associated raw water system becomes inoperable and all the components are operable in the other systems, the reactor may remain in operation for a period not to exceed 7 days or in accordance with the Risk Informed Completion Time Program.

e. ~~If Specifications "a" or "b" are not met, shutdown shall begin within one hour and the reactor coolant shall be below 215°F within ten hours.~~

f. ~~If both containment spray systems become inoperable the reactor shall be in the cold shutdown condition within ten hours and no work shall be performed on the reactor which could result in lowering the reactor water level to more than six feet, three inches (-10 inches indicator scale) below minimum normal water level (Elevation 302'9").~~

c. Raw Water Cooling Pumps

In accordance with the Surveillance Frequency Control Program, manual startup and operability of the raw water cooling pumps shall be demonstrated.

d. Surveillance with Inoperable Components

When a component or system becomes inoperable its redundant component or system shall be verified to be operable immediately and in accordance with the Surveillance Frequency Control Program thereafter.

If both containment spray systems become inoperable, or if one containment spray system and one subsystem in the opposite loop become inoperable, the reactor may remain in operation for a period not to exceed 8 hours.

36

If Specifications "a," "b," "c," "d," or "e" are not met, the reactor shall be in the hot shutdown condition within 12 hours and

LIMITING CONDITION FOR OPERATION

- g.** ~~f.~~ The containment spray system shall be considered operable by verifying that lake water temperature does not exceed 83°F. **g.**
- h.** ~~g.~~ If specification ~~"f"~~ cannot be met commence shutdown within one hour and be in hot shutdown within 8 hours and cold shutdown within 24 hours.

SURVEILLANCE REQUIREMENT

- g.** ~~f.~~ Lake Water Temperature

Record in accordance with the Surveillance Frequency Control Program and at least once per 8 hours when latest recorded water temperature is greater than or equal to 75°F and at least once per 4 hours when the latest recorded water temperature is greater than or equal to 79°F.

ATTACHMENT 3

License Amendment Request

**Nine Mile Point Nuclear Station, Unit 1
Docket No. 50-220**

**Adopt TSTF-230, Revision 1, "Add New Condition B to
LCO 3.6.2.3, 'RHR Suppression Pool Cooling.'"**

**Proposed Technical Specification Bases Changes (Mark-Ups)
(for Information Only)**

TS Bases Pages

162

163 (provided for completeness)

BASES FOR 3.3.7 AND 4.3.7 CONTAINMENT SPRAY SYSTEM

For reactor coolant temperatures less than 215°F not enough steam is generated during a loss-of-coolant accident to pressurize the containment. For reactor coolant temperatures up to 312°F, the resultant loss-of-coolant accident pressure would not exceed the design pressure of 35 psig.

Operation of only one containment spray pump is sufficient to provide the required containment spray cooling flow.⁽¹⁾ The specified flow of 3600 gpm at 87.7 psid primary, 89 psid secondary (approximately 95 percent to the drywell and the balance to the suppression chamber) is sufficient to remove post accident core energy released (FSAR Section VII). Requiring both pumps systems operable (400 percent redundancy) will assure the availability of the containment spray system.⁽¹⁾

Allowable outages are specified to account for components that become inoperable in both systems and for more than one component in a system. Alternatively, a Completion Time can be determined in accordance with the Risk Informed Completion Time Program.

The containment spray raw water cooling system is considered operable when the flow rate is not less than 3000 gpm and the pressure on the raw water side of the containment spray heat exchangers is 10 psig greater than that on the torus water side (not less than 141 psig). The higher pressure on the raw water side will assure that any leakage is into the containment spray system.

Electrical power for all system components is normally available from the reserve transformer. Upon loss of this service the pumping requirement will be supplied from the diesel generator. At least one diesel generator shall always be available to provide backup electrical power for one containment spray system.

Automatic initiation of the containment spray system assures that the containment will not be overpressurized. This automatic feature would only be required if all core spray systems malfunctioned and significant metal-water reaction occurred. For the normal operation condition of 85°F suppression chamber water, containment spray actuation would not be necessary for about 15 minutes.

With both containment spray systems inoperable or one containment spray system and one subsystem in the opposite loop inoperable, the plant can continue to operate for a period not to exceed 8 hours. In this condition, there is a substantial loss of primary containment pressure and temperature mitigation function. The 8-hour Completion Time is based on this loss of function and is considered acceptable due to the low probability of a DBA and the potential avoidance of a plant shutdown transient that could result in the need for the containment spray system to operate.

⁽¹⁾With two of the containment spray intertie valves open, operation of two containment spray pumps is required to assure the proper flow distribution to the containment spray headers to reduce containment pressure during the first fifteen minutes of the LOCA. Requiring two containment spray pumps to operate reduces the 400 percent redundancy of the containment spray system, but there are still six combinations (two out of four pumps) that will assure two pump operation.

If the required Action and associated Completion Time cannot be met, the plant must be brought to an operating condition in which the LCO does not apply. To achieve this status, the plant must be brought to Shutdown Condition-Hot within 12 hours and Shutdown Condition-Cold 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.

AMEND

BASES FOR 3.3.7 AND 4.3.7 CONTAINMENT SPRAY SYSTEM

In conjunction with containment spray pump operation during each operating cycle, the raw water pumps and associated cooling system performance will be observed. The containment spray system shall be capable of automatic initiation from simultaneous low-low reactor water level and high containment pressure. The associated raw water cooling system shall be capable of manual actuation. Operation of the containment spray system involves spraying water into the atmosphere of the containment. Therefore, periodic system tests are not practical. Instead separate testing of automatic containment spray pump startup will be performed during each operating cycle. During pump operation, water will be recycled to the suppression chamber. Also, tests to verify that the drywell and torus spray nozzles are free from obstructions will be performed following maintenance that could result in nozzle blockage. As an alternative, a visual inspection (e.g., boroscope) of the nozzles or piping could be utilized in lieu of an air test if a visual inspection is determined to provide an equivalent or more effective post-maintenance test. A visual inspection may be more effective if the potential for material intrusion is localized and the affected area is accessible. Maintenance that could result in nozzle blockage would be those maintenance activities on any loop of the containment spray system where the Foreign Material Exclusion program controls were deemed ineffective. For activities such as valve repair/replacement, a visual inspection would be the preferred post-maintenance test since small debris in a localized area is the most likely concern. An air test may be appropriate following an event where a large amount of debris potentially entered the system or water was actually discharged through the spray nozzles. Design features are discussed in Volume I, Section VII-B.2.0 (page VII-19)*. The valves in the containment spray system are normally open and are not required to operate when the system is called upon to operate.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.