Southern Nuclear

Regulatory Affairs

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Docket Nos.: 52-026

NL-25-0157
10 CFR 50.90

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

Southern Nuclear Operating Company
Vogtle Electric Generating Plant – Unit 4
License Amendment Request: One-Time Allowance to Repair VES Bottled Air System Valve Leakage

Pursuant to 10 CFR 52.98(c) and in accordance with 10 CFR 50.90, Southern Nuclear Operating Company (SNC) requests an amendment to the Combined License (COL) for Vogtle Electric Generating Plant (VEGP) Unit 4 (License Number NPF-92). The license amendment request (LAR) proposes to revise COL Appendix A, Technical Specifications (TS) 3.7.6, Main Control Room Emergency Habitability System (VES) to add a one-time allowance to provide time to repair VES bottled air system valve leakage.

The Enclosure to this letter provides the description, technical evaluation, regulatory evaluation (including the Significant Hazards Consideration), and environmental considerations for the proposed changes.

Based on the potential for emergent maintenance on Unit 4 VES bottled air system valve repair, SNC is requesting an expedited publishing in the Federal Register of the opportunity for hearing. SNC requests NRC staff review and approval of this LAR as soon as possible and no later than June 16, 2025. The amendment, if approved, will be implemented immediately upon issuance.

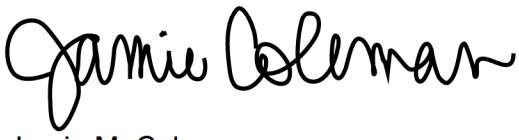
This letter contains no regulatory commitments. This letter has been reviewed and determined not to contain security-related information.

In accordance with 10 CFR 50.91, SNC is notifying the State of Georgia by transmitting a copy of this letter and its enclosure to the designated State Official.

If you have any questions, please contact Ryan Joyce at (205) 992-6468.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 1st of May, 2025.

Respectfully submitted,



Jamie M. Coleman
Director, Regulatory Affairs
Southern Nuclear Operating Company

Enclosure: Evaluation of Proposed Change

cc: NRC Regional Administrator, Region II
NRR Project Manager – Vogtle 3 & 4
Senior Resident Inspector – Vogtle 3 & 4
Director, Environmental Protection Division – State of Georgia
Document Services RTYPE: VND.LI.L00

Enclosure to NL-25-0157

Evaluation of Proposed Changes

1. SUMMARY DESCRIPTION

2. DETAILED DESCRIPTION
   - 2.1 System Design and Operation
   - 2.2 Current Technical Specifications Requirements
   - 2.3 Reason for Proposed Change
   - 2.4 Description of Proposed Change

3. TECHNICAL EVALUATION

4. REGULATORY EVALUATION
   - 4.1 Applicable Regulatory Requirements/Criteria
   - 4.2 Precedent
   - 4.3 Significant Hazards Consideration
   - 4.4 Conclusions

5. ENVIRONMENTAL CONSIDERATION

Attachments:

1. Technical Specification Changes Marked-up Pages
2. Revised Technical Specification Pages
3. Technical Specification Bases Marked-up Pages (for information only)

1. SUMMARY DESCRIPTION

The proposed change would revise the Combined License (COLs) for Vogtle Electric Generating Plant (VEGP) Unit 4 by revising COL Appendix A Technical Specification (TS) 3.7.6, Main Control Room Emergency Habitability System (VES) to add a one-time allowance to provide time to repair VES bottled air system valve leakage.

2. DETAILED DESCRIPTION

2.1 System Design and Operation

As described in Updated Final Safety Analysis Report (UFSAR) subsection 6.4.2.2, the VES air storage tanks are sized to deliver the required air flow to the main control room (MCR) and induce sufficient air flow through the passive filtration line to meet the ventilation and pressurization requirements for 72 hours. Normal air storage tank makeup is provided by a connection to the breathable quality air compressor in the compressed and instrument air system (CAS). See UFSAR subsection 9.3.1 for a description of the CAS. A connection for refilling operation is provided in the CAS.

As described in the TS 3.7.6 Bases, there are 32 compressed air storage tanks arranged in four banks. Each bank is normally aligned to the VES air delivery header providing at least 81,893.5 scf of compressed air to support the minimum required 327,574 scf to support the safety design basis for automatic VES operation for 72-hours of post-accident operation. With the compressed air equivalent of one bank of tanks unavailable, verifying > 245,680 scf of compressed air ensures the equivalent of three banks remains available to supply air to the main control room envelope (MCRE) for 54 hours (75% of the required 72 hours). The MCRE ancillary fans are capable of maintaining the habitability of the MCRE after 54 hours.

When a source of ac power is available, the nuclear island nonradioactive ventilation system (VBS) provides normal and abnormal HVAC service to the main control room (MCR), control support area (CSA), instrumentation and control rooms, dc equipment rooms, battery rooms, and the nuclear island nonradioactive ventilation system equipment room as described in UFSAR subsection 9.4.1. During normal plant operation, one of the two 100 percent capacity supply air handling units and return/exhaust air fans operates continuously. Outside makeup air supply to the supply air handling units is provided through an outside air intake duct. The outside airflow rate is automatically controlled to maintain the MCR and CSA areas at a slightly positive pressure with respect to the surrounding areas and the outside environment. The VBS air handling units are sized to provide cooling air for personnel comfort and equipment cooling.

As described in UFSAR subsection 9.4.1.1.1, VBS is designed to control the radiological habitability in the MCR within the guidelines presented in Standard Review Plan (SRP) 6.4, “Control Room Habitability System,” and NUREG 0696, "Functional Criteria for Emergency Response Facilities." VBS is designed to provide a reliable source of heating, ventilation, and cooling to the areas served when ac power is available. The system equipment and component functional capabilities are to minimize the potential for actuation of VES or the potential reliance on passive equipment cooling. This is

achieved through the use of redundant equipment and components that are connected to standby onsite ac power sources.

As described in UFSAR 9.4.1.2.3.1, if “High-1” radioactivity is detected in the MCR supply air duct and VBS is operable, both supplemental air filtration units automatically start to pressurize the MCR and CSA areas to at least 1/8 inch wg with respect to the surrounding areas and the outside environment using filtered makeup air. The MCR/CSA supply air handling unit continues to provide cooling with recirculation air to maintain the MCR passive heat sink below its initial ambient air design temperature and maintains the MCR and CSA areas within their design temperatures. The supplemental air filtration subsystem pressurizes the combined volume of the MCR and CSA concurrently with filtered outside air. A portion of the recirculation air from the MCR and CSA is also filtered for cleanup of airborne radioactivity. The system is designed to maintain personnel doses within allowable General Design Criteria (GDC) 19 limits during design basis accidents in both the MCR and the CSA, as discussed in UFSAR subsection 6.4.4.

As described in UFSAR subsection 9.4.1.2.2, each supplemental air filtration unit includes a fan, a high efficiency filter bank, an electric heating coil, a charcoal adsorber with upstream HEPA filter bank, and a downstream postfilter bank. The filtration unit configurations, including housing, internal components, ductwork, dampers, fans and controls, and the location of the fans on the unfiltered side of units are designed, constructed, and tested to meet the applicable performance requirements of ASME AG-1 (Code on Nuclear Air and Gas Treatment), ASME N509 (Nuclear Power Plant Air-Cleaning Units and Components), and ASME N510 (Testing of Nuclear Air-Cleaning Systems) to satisfy the guidelines of Regulatory Guide 1.140 (Design, Inspection, and Testing Criteria for Air Filtration and Adsorption Units of Normal Atmospheric Cleanup Systems in Light-Water-Cooled Nuclear Power Plants).

Power is supplied to VBS by the plant ac electrical system. In the event of a loss of the normal ac power and offsite power, two standby diesel generators provide power to support the operation of VBS. Two onsite standby diesel generator units, each furnished with its own support subsystems, provide power to the selected plant nonsafety-related ac loads. Power supplies to each diesel generator subsystem components are provided from separate sources to maintain reliability and operability of the onsite standby power system.

2.2 Current Technical Specifications Requirements

TS 3.7.6 requires operability of VES, including maintaining compressed air storage tanks connected volume.

- In the event that all compressed air storage tank banks are isolated (i.e., failure to meet SR 3.7.6.1), Condition E would be entered, and at the expiration of the Required Action E.1 two-hour Completion Time, Condition F would be entered for failure to meet Required Action and associated Completion Time of Condition E.
- Entry into Condition F requires the plant to be in Mode 3 within 6 hours and Mode 5 within 36 hours.

2.3 Reason for the Proposed Change

Unit 4 VES bottled air Bank 1 outlet manual isolation valve (4-VES-V025A; refer to UFSAR Figure 6.4-2, Sheet 1 of 2, Simplified Main Control Room Habitability System

Piping and Instrumentation Diagram, showing the VES bottled air system and 4-VES-V025A) has been found with packing leakage. The recent leakage commenced during valve stroking for bank isolation during routine VES bottled air recharging. The valve has been placed on its backseat with increased torquing to stop the leakage. However, this is a temporary solution. The potential for subsequent increased leakage is considered a possibility and plans are made for a permanent repair. SNC is currently planning to defer the repair of 4-VES-V025A until the Unit 4 first Refueling Outage (4R01; planned for early Fall 2025) when VES is not required to be operable. However, contingencies are also in place to commence repairs prior to 4R01 in the event that VES bottled air system leakage (e.g., 4-VES-V025A) increases to the point that VES becomes inoperable. The repair of 4-VES-V025A requires isolation and depressurizing Bank 1 (i.e., 25% of the normally available bottled air supply; rendering VES inoperable and entering TS 3.7.6 Action E) and subsequent complete isolation of bottled air from the VES air delivery header (rendering failure to meet TS 3.7.6 Required Action E.1) as 4-VES-V025A is exposed to the VES air header.

In that event, the repair options developed cannot be reasonably accomplished within the six hours allowed by Required Action F.1, and plant transition to Mode 3 (Hot Shutdown) would be required within six hours, followed by Required Action F.2 requirement to be in Mode 5 (Cold Shutdown) within 36 hours.

The proposed 72-hour Completion Time deferral is necessary to complete repair of 4-VES-V025A with sufficient margin to avoid the additional risk to which the unit is exposed in the event of a required plant shutdown. The Completion Time deferral provides the following potential benefits in the event the VES air system leakage results in inoperability of VES:

- Provide additional time to complete repairs; thereby avoiding an unnecessary unplanned shutdown of the unit, which could challenge safety systems.
- Reducing the potential administrative burden of requesting a notice of enforcement discretion or emergency license amendment.
- Provide additional time to complete repair with sufficient margin to provide a controlled environment, which will enhance equipment and personnel safety.

2.4 Description of the Proposed Change

The Required Actions F.1 and F.2 for Condition F are proposed to be modified by a Note stating:

> For one-time use on Unit 4, initiation of Required Actions F.1 and F.2 Completion Times may be delayed for 72 hours from discovery of Condition F entry when Condition F entry is a result of VES air system leakage repair(s). This provision expires on entry into MODE 4 on startup from 4R01.

3. TECHNICAL EVALUATION

As described in LAR Section 2.1, VBS is designed to control the radiological habitability in the main control room within the guidelines presented in Standard Review Plan (SRP) 6.4, “Control Room Habitability System,” and NUREG 0696, "Functional Criteria for Emergency Response Facilities," and within allowable GDC 19 limits during design basis accidents in both the MCR and CSA.

As described in UFSAR subsection 6.4.4, in the event of an accident involving the release of radioactivity to the environment, VBS is expected to switch from the normal operating mode to the supplemental air filtration mode to protect the MCR personnel. Control Room doses are also calculated assuming that VBS operates in the supplemental air filtration mode as designed, with no switchover to VES operation. This VBS operating case demonstrates the defense-in-depth that is provided by the system and also shows that, in the event of an accident with realistic assumptions, VBS is adequate to protect the control room operators without depending on VES operation.

Although VBS is not a safety-related system, it is expected to be available to provide the necessary protection for realistic events. In the event of a loss of the normal ac power and offsite power, two standby diesel generators provide power to support the operation of VBS. Since VBS operates continuously during normal plant operation, its availability is continuously evident and maintaining its continued reliability is necessary for normal plant operations.

As described in UFSAR subsections 1.9.4.2.3, in the unlikely event of a toxic chemical release, operators have options to manually actuate VES or utilize the 6-hour supply of self-contained portable breathing equipment stored within the main control room pressure boundary. However, as described in UFSAR subsection 6.4.4.2, evaluations have shown that there are no toxic hazards to Units 3 and 4 control room personnel. As such the use of VES or self-contained portable breathing equipment is not postulated to be needed for toxic chemical releases. The TS operability requirement for VES does not include the necessity for VES to be operable for toxic gas event protection.

As described in UFSAR subsection 9.4.1.2.3.1, in the event a high concentration of smoke is detected in the outside air intake, an alarm is initiated in the main control room and VBS is manually realigned to the recirculation mode by closing the outside air and toilet exhaust duct isolation valves. The TS operability requirement for VES does not include the necessity for VES to be operable for smoke event protection.

As such, reliance on VBS during the one-time temporary extension of the Completion Times for Required Actions F.1 and F.2 does not reflect a significant impact to plant safety.

Should the leakage unexpectedly increase and render VES inoperable, the repair options developed cannot be reasonably accomplished without entering Condition F and requiring the plant to transition to Mode 3 (Hot Shutdown) within six hours, followed by Required Action F.2 requirement to be in Mode 5 (Cold Shutdown) within 36 hours. The contingencies for repair include replacing packing and, in the event that repair is not successful, a subsequent replacement of 4-VES-V025A. The estimated durations for the sequential contingencies of valve packing repair and valve replacement and return to VES operability could total 52 hours. This estimate includes:

- Mobilize maintenance staff
- Tagging
- De-energize (evacuate) bottled air Bank 1
- Isolate remaining VES bottled air banks
- Packing repair
- Refill air bottle Bank 1

- Inspection / testing
- Remove Operations clearances

An additional contingency considers that manipulating the remaining bottled air banks manual isolation valves that are necessary to establish the boundary for repair of 4-VES-V025A, could result in discovering an additional packing leaks requiring additional packing adjustments. Finally, as a general good practice to account for unexpected difficulties with any repair activity, planned repair times should not approach the allowed time. Providing sufficient repair time, including additional contingency time, minimizes the potential operational burden of an impending required plant shutdown, or exercising requests for regulatory relief. Also noted when circumstances result in restoration timelines that begin to approach the allowed repair time, these operational burdens are realized (i.e., development of regulatory relief requests commence well before exceeding the allowed repair time).

The proposed 72-hour Completion Time deferral provides the necessary time to complete repair of 4-VES-V025A with sufficient margin for contingencies to avoid the additional risk to which the unit is exposed in the event of a required plant shutdown. The Completion Time deferral provides the following potential benefits in the event the VES air system leakage results in inoperability of VES:

- Provide additional time to complete repairs; thereby avoiding an unnecessary unplanned shutdown of the unit, which could challenge safety systems.
- Reduce the potential administrative burden of requesting a notice of enforcement discretion or emergency license amendment.
- Provide additional time to complete repair with sufficient margin to provide a controlled environment, which will enhance equipment and personnel safety.

Maintenance Rule Control

The VBS and standby diesel generators are included under the VEGP Maintenance Rule Program. The VBS and standby diesel generators (ZOS) are being effectively controlled through the performance of appropriate preventive maintenance, such that they remain capable of performing their intended functions, in compliance with 10 CFR 50.65(a)(2). The Maintenance Rule status for both VBS and ZOS are in green, “(a)(2)” status.

Probabilistic Risk Assessment (PRA) Insights

The VEGP Unit 4 Probabilistic Risk Assessment (PRA) models provide for quantitative assessment of at-power internal events, internal floods, internal fires, and seismic events. The Vogtle Unit 4 PRA models include credit for the VES function to provide passive control room cooling capabilities (which is not impacted by this request). The VES function to provide a passive air supply to the main control room is not modeled because it is not a necessary function to prevent or mitigate core damage. As a result, there is no quantifiable Core Damage Frequency (CDF) or Large Early Release Frequency (LERF) change associated with the proposed change.

The VEGP Maintenance Rule non-PRA Safety Significance Classification for the VES functions concluded that VES classification is “Low Safety Significant.”

As discussed in the NRC Enforcement Manual, Appendix F, “Notices of Enforcement Discretion” (December 26, 2023 [ADAMS Accession No. ML23362A014]), Section 1.4, Background:

The NRC has historically recognized that the two safest modes for operating a nuclear power plant are either Mode 5 (shut down) or Mode 1 (operating at power). Transitions between these two modes may introduce situations or configurations that involve an increase in risk.".

As such, SNC believes the lessor impact to plant safety risk is provided by allowing sufficient time to complete valve leakage repairs at power rather than requiring the plant transient imposed by transitioning through multiple modes to accomplish a plant shutdown.

Conclusion

The proposed TS change is consistent with the principle that sufficient safety margins are maintained based on the following:

- VBS is designed with redundant subsystems
- VBS backup power supply (standby diesel generators) is designed to support VBS in the event of a loss of offsite power
- MCR dose analyses demonstrate that MCR habitability is maintained with VBS operation

The proposed change to TS 3.7.6 is based on design provisions that continue to support the MCR habitability during design basis events while crediting non-safety VBS and standby diesel generators. Analysis has shown that crediting VBS continues to support the MCR habitability safety function and GDC 19 acceptance criteria. The proposed change has no adverse effect on the UFSAR accident analysis and will continue to meet functional capability or performance levels of equipment required for safe operation of the facility and the protection of public health and safety.

The proposed changes provide appropriate consideration of increased risk to plant safety from an unnecessary plant shutdown verses a one-time extension allowing time to repair valve leakage. The requested change continues to provide the appropriate protection for the MCR plant operations staff in meeting GDC 19. Therefore, there is reasonable assurance that the health and safety of the public, and the MCR staff, will not be endangered by the proposed change.

Additional Information

The goal of the plant procedure for Protected Equipment is to maintain defense in depth for Key Safety Functions, preventing inadvertent plant trips, transients, or unexpected LCO entries. While VES and VBS are not associated with Key Safety Functions, VEGP Unit 4 expects to extend protected system status for:

- One train of VBS
- The standby diesel generator associated with the protected VBS train

Protected Equipment is controlled by the Protected Train/Division and Protected Equipment Program. Physical barriers or signage is used to alert personnel to maintain a safe distance from the Protected Equipment to prevent unintended consequences from operation, maintenance, or nearby activity. Protected equipment has a physical barrier preventing access or work in the area and requires shift manager permission to enter the area. Operations personnel performing operator rounds are allowed to enter areas of protected equipment to ensure equipment conditions remain in the expected condition. In addition, operators monitor plant equipment to ensure no unauthorized work and periodically walk

down postings and spot check behaviors and conditions to support effective equipment protection.

SNC is not proposing these additional protections as providing any necessary protection of public health and safety, nor as a basis for establishing the requested one-time Completion Time extension. This is consistent with this procedure's use during other TS inoperabilities warranting additional protections to maintain available defense in depth, which is also not a basis for the established TS Completion Times. The intent to establish protected system status for VBS is captured in the drafted TS Bases shown in Attachment 3, for information only.

4 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

In conformance with 10 CFR 50.36(c)(2) the VEGP Units 3 and 4 Combined License (COL) Appendix A Technical Specifications (TS) requires a Limiting Condition for Operation (LCO) and appropriate remedial action permitted by the TS. The proposed TS Required Action Note meets this provision. Thus, the proposed changes are consistent with the requirements of 10 CFR 50.36.

10 CFR Part 50, Appendix A, General Design Criterion (GDC) 19, Control room, requires adequate radiation protection to permit access and occupancy of the control room under accident conditions without personnel receiving radiation exposures in excess of 5 rem whole body, or its equivalent to any part of the body, for the duration of the accident. VBS has been evaluated to provide this protection in the event VES is not actuated. Thus, the proposed changes are consistent with the requirements of 10 CFR 50, Appendix A, GDC 19.

4.2 Precedent

None

4.3 Significant Hazards Consideration

Southern Nuclear Operating Company (SNC) is requesting an amendment to Combined License (COL) No. NPF-92 for Vogtle Electric Generating Plant (VEGP) Unit 4. The license amendment request (LAR) proposes to revise Appendix A, Technical Specification (TS), 3.7.6, Main Control Room Emergency Habitability System (VES) to add a new Action to support emergent maintenance on Unit 4 VES bottled air valve leakage.

An evaluation to determine whether or not a significant hazards consideration is involved with the proposed amendment was completed by focusing on the three standards set forth in 10 CFR 50.92(c), "Issuance of amendment," as discussed below.

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

   Response: No

   The proposed change does not affect the previously evaluated accident probability because the Updated Final Safety Analysis Report (UFSAR) Chapter 15 initiating events for analyzed accidents do not change. The main control room emergency

habitability system (VES) is not considered an accident initiator. The proposed changes do not adversely affect accident initiators or precursors, and do not alter the design assumptions, conditions, or configuration of the plant or the manner in which the plant is operated or maintained.

Therefore, the proposed change does not result in any increase in probability of an analyzed accident occurring.

The proposed change does not impact the nuclear island nonradioactive ventilation system (VBS) ability to protect control room personnel from radiological consequences. The proposed change provides that the main control room will continue to protect the control room personnel in meeting General Design Criterion (GDC) 19 dose limits. Thus, the consequences of the accidents previously evaluated are not adversely affected.

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

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

   Response: No

   The proposed change does not involve the installation of any new or different type of equipment or a change to the methods governing normal plant operation. The proposed changes continue to provide the functional capability for previously evaluated accidents and anticipated operational occurrences. The proposed change does not adversely impact the function of any related systems, and thus, the changes do not introduce a new failure mode, malfunction, or sequence of events that could adversely affect safety or safety-related equipment

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

3. Does the proposed change involve a significant reduction in a margin of safety?

   Response: No.

   Margins of safety are established in the design of components, the configuration of components to meet certain performance parameters, and in the establishment of setpoints to initiate alarms or actions. The proposed amendment does not alter the design or configuration of the VES or VBS. The proposed change does not change the function of the related systems. The proposed change was evaluated and demonstrated that the control room habitability during analyzed events remains.

   Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, it is concluded that the proposed amendment does not involve a 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

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. Therefore, it is concluded that the requested amendment does not involve a 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.

5 ENVIRONMENTAL CONSIDERATION

The proposed changes to the Technical Specifications (TS) are described in Section 2 of this Enclosure, which require a license amendment. SNC has evaluated this license amendment request against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21.

The requested amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9), in that the amendment would 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 criteria 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 amendment.

Attachment 1

Technical Specification Changes Marked-up Pages

Insertions Denoted by underlined Blue text
Omitted text is identified by three asterisks (* * *)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
F. Required Action and associated Completion Time of Condition A, B, C, D, or E not met in MODE 1, 2, 3, or 4. OR VES inoperable for reasons other than Condition A, B, C, D, or E in MODE 1, 2, 3, or 4.	F.1 Be in MODE 3. AND F.2 Be in MODE 5.	6 hours 36 hours
G. Required Action and associated Completion Time of Condition A, B, C, or E not met during movement of irradiated fuel. OR VES inoperable for reasons other than Condition A, B, C, or E during movement of irradiated fuel. OR VES inoperable due to inoperable MCRE boundary during movement of irradiated fuel.	G.1 Suspend movement of irradiated fuel assemblies. ----------NOTE---------- For one-time use on Unit 4, initiation of Required Actions F.1 and F.2 Completion Times may be delayed for 72 hours from discovery of Condition F entry when Condition F entry is a result of VES air system leakage repair(s). This provision expires on entry into MODE 4 on startup from 4R01. ----------	Immediately

Attachment 2

Revised Technical Specification Pages

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
F. Required Action and associated Completion Time of Condition A, B, C, D, or E not met in MODE 1, 2, 3, or 4. OR VES inoperable for reasons other than Condition A, B, C, D, or E in MODE 1, 2, 3, or 4.	---------- **- NOTE -** For one-time use on Unit 4, initiation of Required Actions F.1 and F.2 Completion Times may be delayed for 72 hours from discovery of Condition F entry when Condition F entry is a result of VES air system leakage repair(s). This provision expires on entry into MODE 4 on startup from 4R01. ---------- F.1 Be in MODE 3. AND F.2 Be in MODE 5.	 6 hours 36 hours
G. Required Action and associated Completion Time of Condition A, B, C, or E not met during movement of irradiated fuel. OR VES inoperable for reasons other than Condition A, B, C, or E during movement of irradiated fuel. OR VES inoperable due to inoperable MCRE boundary during movement of irradiated fuel.	G.1 Suspend movement of irradiated fuel assemblies.	Immediately

Attachment 3

Technical Specification Bases Marked-up Pages
(For Information Only)

BASES

ACTIONS (continued)

F.1 and F.2

In MODE 1, 2, 3, or 4 if the Required Actions and Completion Times of Condition A, B, C, D, or E are not met, or the VES is inoperable for reasons other than Condition A, B, C, D, or E (e.g., with compressed air storage tanks containing ≤ 245,680 scf), the unit must be placed in a MODE in which the LCO does not apply. To achieve this status, the unit must be placed in at least MODE 3 within 6 hours and in MODE 5 within 36 hours.

G.1

During movement of irradiated fuel assemblies, if the Required Actions and Completion Times of Condition A, B, C, or E are not met, or the VES is inoperable for reasons other than Condition A, B, C, or E, or the VES is inoperable due to an inoperable MCRE boundary, action must be taken immediately to suspend the movement of fuel. This does not preclude the movement of fuel to a safe position.

SURVEILLANCE REQUIREMENTS

SR 3.7.6.1

Verification is required every 24 hours that compressed air storage tanks contain > 327,574 scf of breathable air.

The standard volume is determined using the compressed air storage tank room temperature (VAS-TE-080A/B) and compressed air storage tanks pressure (VES-PT-001A/B) via the plant control system and chart in the system procedures. Verification that the minimum volume of compressed air is contained in the compressed air storage tanks ensures that there will be an adequate supply of breathable air to maintain MCRE habitability for a period of 72 hours. The Frequency of 24 hours is based on the availability of pressure indication in the MCRE.

SR 3.7.6.2

SR 3.7.6.2 verifies that the thermal mass of the required heat sinks is within limit(s) every 24 hours. One method of satisfying SR 3.7.6.2 is maintaining ambient air temperature below the limit for the MCRE (i.e., ≤ 75°F), the individual required rooms (i.e., ≤ 85°F), and adjacent required room-pairs (i.e., ≤ 85°F) for 4 days. Alternatively, analyses or local measurements can satisfy the verification of the heat sink thermal mass assumed in the main control room heatup calculation.

Required Actions F.1 and F.2 are modified by a Note allowing a modified time zero for one-time use on Unit 4. In this event, initiation of the Required Actions F.1 and F.2 Completion Times may be delayed for 72 hours from discovery of Condition F entry when Condition F entry is a result of VES air system leakage repair(s). The allowance is also intended to be applicable when Condition F is entered from failure to meet Required Action E.1 in its associated Completion Time due to an unplanned increased air leakage that results in the need to initiate repair(s). This provision expires on entry into MODE 4 on startup from 4R01. During this allowance one train of VBS and the associated standby diesel generator are "protected."