

LIMITING SAFETY SYSTEM SETTINGS

BASES

2.2.1 REACTOR TRIP SYSTEM INSTRUMENTATION SETPOINTS (Continued)

The various Reactor trip circuits automatically open the Reactor trip breakers whenever a condition monitored by the Reactor Trip System reaches a preset or calculated level. In addition to redundant channels and trains, the design approach provides a Reactor Trip System which monitors numerous system variables, therefore providing Trip System functional diversity. The functional capability at the specified trip setting is required for those anticipatory or diverse Reactor trips for which no direct credit was assumed in the safety analysis to enhance the overall reliability of the Reactor Trip System. The Reactor Trip System initiates a Turbine trip signal whenever Reactor trip is initiated. This prevents the reactivity insertion that would otherwise result from excessive Reactor Coolant System cooldown and thus avoids unnecessary actuation of the Engineered Safety Features Actuation System.

Manual Reactor Trip

The Reactor Trip System includes manual Reactor trip capability.

Power Range, Neutron Flux

In each of the Power Range Neutron Flux channels there are two independent bistables, each with its own trip setting used for a High and Low Range trip setting. The Low Setpoint trip provides protection during subcritical and low power operations to mitigate the consequences of a power excursion beginning from low power, and the High Setpoint trip provides protection during power operations to mitigate the consequences of a reactivity excursion from all power levels.

The Low Setpoint trip may be manually blocked above P-10 (a power level of approximately 10% of RATED THERMAL POWER) and is automatically reinstated below the P-10 Setpoint.

Power Range, Neutron Flux, High Rates

The Power Range Positive Rate trip provides protection against rapid flux increases which are characteristic of a rupture of a control rod drive housing. Specifically, this trip complements the Power Range Neutron Flux High and Low trips to ensure that the criteria are met for rod ejection from mid-power.

The Power Range Negative Rate trip provides protection for control rod drop accidents. At high power, a single or multiple rod drop accident could cause local flux peaking which could cause an unconservative local DNBR to exist. The Power Range Negative Rate trip will prevent this from occurring by tripping the reactor. No credit is taken for operation of the Power Range Negative Rate trip for those control rod drop accidents for which DNBRs will be greater than or equal to the DNBR limits specified in the applicable NRC-approved analytical methods referenced in Specification 6.8.1.6.b.5. |

LIMITING SAFETY SYSTEM SETTINGS

BASES

2.2.1 REACTOR TRIP SYSTEM INSTRUMENTATION SETPOINTS (Continued)

Pressurizer Pressure

In each of the pressurizer pressure channels, there are two independent bistables, each with its own trip setting to provide for a High and Low Pressure trip, thus limiting the pressure range in which reactor operation is permitted. The Low Setpoint trip protects against low pressure that could lead to DNB by tripping the reactor in the event of a loss of reactor coolant pressure.

On decreasing power the Low Setpoint trip is automatically blocked by P-7 (a power level of approximately 10% of RATED THERMAL POWER with turbine impulse chamber pressure at approximately 10% of full power equivalent); and on increasing power, automatically reinstated by P-7.

The High Setpoint trip functions in conjunction with the pressurizer relief and safety valves to protect the Reactor Coolant System against system overpressure.

Pressurizer Water Level

The Pressurizer High Water Level trip is provided to prevent water relief through the pressurizer safety valves. On decreasing power, the Pressurizer High Water Level trip is automatically blocked by P-7 (a power level of approximately 10% of RATED THERMAL POWER with a turbine impulse chamber pressure at approximately 10% of full-power equivalent); and on increasing power, the Pressurizer High Water Level trip is automatically reinstated by P-7.

Reactor Coolant Flow

The Low Reactor Coolant Flow trips provide core protection to prevent DNB by mitigating the consequences of a loss of flow resulting from the loss of one or more reactor coolant pumps.

On increasing power above P-7 (a power level of approximately 10% of RATED THERMAL POWER or a turbine impulse chamber pressure at approximately 10% of full power equivalent), an automatic Reactor trip will occur if the flow in more than one loop drops below 90% of indicated loop flow. Above P-8 (a power level of approximately 50% of RATED THERMAL POWER), an automatic Reactor trip will occur if the flow in any single loop drops below 90% of indicated loop flow. Conversely, on decreasing power between P-8 and the P-7, an automatic Reactor trip will occur on low reactor coolant flow in more than one loop and below P-7 the trip function is automatically blocked.

Steam Generator Water Level

The Steam Generator Water Level Low-Low trip protects the reactor from loss of heat sink in the event of a sustained steam/feedwater flow mismatch resulting from loss of normal feedwater. The specified Setpoint provides allowances for starting delays of the Emergency Feedwater System.

INSTRUMENTATION

BASES

MONITORING INSTRUMENTATION

3/4.3.3.5 REMOTE SHUTDOWN SYSTEM (Continued)

The OPERABILITY of the Remote Shutdown System ensures that a fire will not preclude achieving safe shutdown. The Remote Shutdown System instrumentation, control, and power circuits and transfer switches necessary to eliminate effects of the fire and allow operation of instrumentation, control and power circuits required to achieve and maintain a safe shutdown condition are independent of areas where a fire could damage systems normally used to shut down the reactor. This capability is consistent with General Design Criterion 3 and Appendix R to 10CFRPart 50.

3/4.3.3.6 ACCIDENT MONITORING INSTRUMENTATION

The OPERABILITY of the accident monitoring instrumentation ensures that sufficient information is available on selected plant parameters to monitor and assess these variables following an accident. This capability is consistent with the recommendations of Regulatory Guide 1.97, Revision 3, "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant Conditions During and Following an Accident," May 1983 and NUREG-0737, "Clarification of TMI Action Plan Requirements," November 1980.

3/4.3.3.7 (THIS SPECIFICATION NUMBER IS NOT USED)

3/4.3.3.8 (THIS SPECIFICATION NUMBER IS NOT USED)

3/4.3.3.9 (THIS SPECIFICATION NUMBER IS NOT USED)

3/4.3.3.10 EXPLOSIVE GAS MONITORING INSTRUMENTATION

The explosive gas instrumentation is provided to monitor and control, the concentrations of potentially explosive gas mixtures in the WASTE GAS HOLDUP SYSTEM. The OPERABILITY and use of this instrumentation is consistent with the requirements of General Design Criteria 60, 63, and 64 of Appendix A to 10 CFR Part 50.

INSTRUMENTATION

BASES

3/4.3.4 (THIS SPECIFICATION NUMBER IS NOT USED)

REACTOR COOLANT SYSTEM

BASES

REACTOR COOLANT SYSTEM LEAKAGE

3/4.4.6.2 OPERATIONAL LEAKAGE (Continued)

Industry experience has shown that while a limited amount of leakage is expected from the RCS, the unidentified portion of this leakage can be reduced to a threshold value of less than 1 gpm. This threshold value is sufficiently low to ensure early detection of additional leakage.

The total steam generator tube leakage limit of 1 gpm for all steam generators not isolated from the RCS ensures that the dosage contribution from the tube leakage will be limited to a small fraction of 10 CFR Part 100 dose guideline values in the event of either a steam generator tube rupture or steam line break. The 1 gpm limit is consistent with the assumptions used in the analysis of these accidents. The 500 gpd leakage limit per steam generator ensures that steam generator tube integrity is maintained in the event of a main steam line rupture or under LOCA conditions.

The 10 gpm IDENTIFIED LEAKAGE limitation provides allowance for a limited amount of leakage from known sources whose presence will not interfere with the detection of UNIDENTIFIED LEAKAGE by the Leakage Detection Systems.

The CONTROLLED LEAKAGE limitation restricts operation when the total flow supplied to the reactor coolant pump seals exceeds 40 gpm with the modulating valve in the supply line fully open at a nominal RCS pressure of 2235 psig. This limitation ensures that in the event of a LOCA, the safety injection flow will not be less than assumed in the safety analyses.

The specified allowed leakage from any RCS pressure isolation valve is sufficiently low to ensure early detection of possible in-series check valve failure. It is apparent that when pressure isolation is provided by two in-series check valves and when failure of one valve in the pair can go undetected for a substantial length of time, verification of valve integrity is required. Since these valves are important in preventing overpressurization and rupture of the ECCS low pressure piping which could result in a LOCA that bypasses containment, these valves should be tested periodically to ensure low probability of gross failure.

The Surveillance Requirements for RCS pressure isolation valves provide added assurance of valve integrity thereby reducing the probability of gross valve failure and consequent intersystem LOCA. RCS Pressure Isolation Valve (PIV) Leakage measures leakage through each individual PIV and can impact this LCO. Of the two PIVs in series in each isolated line, leakage measured through one PIV does not result in RCS leakage when the other is leak tight. If both valves leak and result in a loss of mass from the RCS, the loss must be included in the allowable IDENTIFIED LEAKAGE.

REACTOR COOLANT SYSTEM

BASES

3/4.4.10 STRUCTURAL INTEGRITY

The inservice inspection and testing programs for ASME Code Class 1, 2, and 3 components ensure that the structural integrity and operational readiness of these components will be maintained at an acceptable level throughout the life of the plant. These programs are in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50.55a(g) except where specific written relief has been granted by the Commission pursuant to 10 CFR 50.55a(g)(6)(i).

Components of the Reactor Coolant System were designed to provide access to permit inservice inspections in accordance with Section XI of the ASME Boiler and Pressure Vessel Code.

3/4.4.11 REACTOR COOLANT SYSTEM VENTS

Reactor Coolant System vents are provided to exhaust noncondensable gases and/or steam from the Reactor Coolant System that could inhibit natural circulation core cooling. The OPERABILITY of least one Reactor Coolant System vent path from the reactor vessel head and the pressurizer steam space ensures that the capability exists to perform this function.

The valve redundancy of the Reactor Coolant System vent paths serves to minimize the probability of inadvertent or irreversible actuation while ensuring that a single failure of a vent valve, power supply, or control system does not prevent isolation of the vent path.

The function, capabilities, and testing requirements of the Reactor Coolant System vents are consistent with the requirements of Item II.B.1 of NUREG-0737, "Clarification of TMI Action Plant Requirements," November 1980.

CONTAINMENT SYSTEMS

BASES

3/4.6.1 PRIMARY CONTAINMENT (Continued)

3/4.6.1.5 AIR TEMPERATURE

The limitation in containment average air temperature ensures that the containment average air temperature does not exceed the initial temperature condition assumed in the overall safety analysis for a steam line break accident. Measurements shall be made at all listed locations, whether by fixed or portable instruments, prior to determining the average air temperature.

3/4.6.1.6 CONTAINMENT VESSEL STRUCTURAL INTEGRITY

This limitation ensures that the structural integrity of the containment steel vessel will be maintained comparable to the original design standards for the life of the facility. Structural integrity is required to ensure that the vessel will withstand the maximum pressure of 52 psig in the event of a LOCA. A visual inspection in accordance with the Containment Leakage Rate Testing Program demonstrates this capability.

3/4.6.1.7 CONTAINMENT VENTILATION SYSTEM

The 36-inch containment shutdown purge supply and exhaust isolation valves are not utilized during plant operation in MODES 1, 2, 3, and 4. A blind flange is installed establishing a Type "B" penetration. The penetration is surveilled in accordance with Surveillance Requirement 4.6.1.1a in MODES 1, 2, 3, and 4.

The use of the containment purge lines is restricted to the 8-inch purge supply and exhaust isolation valves since, unlike the 36-inch valves, the 8-inch valves are capable of closing during a LOCA or steam line break accident. Therefore, the SITE BOUNDARY dose guideline values of 10 CFR Part 100 would not be exceeded in the event of an accident during containment PURGING operation. The total time the containment purge (vent) system isolation valves may be open during MODES 1, 2, 3, and 4 in a calendar year is determined by the actual need for opening the valves for safety-related reasons; e.g., containment pressure control or the reduction of airborne radioactivity to facilitate personnel access for surveillance and maintenance activities.

Leakage integrity tests with a maximum allowable leakage rate for containment purge supply and exhaust supply valves will provide early indication of resilient material seal degradation and will allow opportunity for repair before gross leakage failures could develop. The containment purge supply and exhaust isolation valves are leakage rate tested in accordance with the Containment Leakage Rate Testing Program.

3/4.7.1.6 ATMOSPHERIC RELIEF VALVES

The OPERABILITY of the Atmospheric Relief Valves (ARVs) ensures the controlled removal of reactor decay heat during reactor cooldown, plant startup, and after a turbine trip, when the condenser and/or the turbine bypass system are not available. When available, the ARVs can be used to reduce main steam pressure for both hot shutdown and cold shutdown conditions. The ARVs provide a method for cooling the plant to residual heat removal entry conditions should the turbine bypass system to the condenser be unavailable. This is done in conjunction with the Auxiliary Feedwater System providing cooling water from the condensate storage tank (CST).

One ARV line for each of the four steam generators is provided. Each ARV line consists of one ARV and an associated block valve. The ARVs are provided with upstream block valves to provide an alternate means of isolation.

The ARVs are equipped with pneumatic controllers to permit control of the cooldown rate. The ARVs are provided with a pressurized gas supply of bottled nitrogen that, on a loss of pressure in the normal instrument air supply, automatically supplies nitrogen to operate the ARVs. The nitrogen supply is sized to provide sufficient pressurized gas to operate the ARVs for the time required for Reactor Coolant System cooldown to RHR entry conditions. The ARVs are OPERABLE with only a DC power source available. In addition, handwheels are provided for local manual operation.

PLANT SYSTEMS

BASES

3/4.7.6 CONTROL ROOM SUBSYSTEMS

The OPERABILITY of the Control Room Emergency Makeup Air and Filtration Subsystem ensures that the control room will remain habitable for operations personnel during and following credible accident conditions. Cumulative operation of the system with the heaters on for 10 hours over a 31-day period is sufficient to reduce the buildup of moisture on the absorbers and HEPA filters. Heaters cycle on and off to maintain the relative humidity below 70%. The OPERABILITY of this system in conjunction with control room design provisions is based on limiting the radiation exposure to personnel occupying the control room to 5 rems or less whole body, or its equivalent. This limitation is consistent with the requirements of General Design Criterion 19 of Appendix A, 10 CFR Part 50. ANSI N510-1980 will be used as a procedural guide for surveillance testing.

The OPERABILITY of the safety-related Control Room Air Conditioning Subsystem ensures that the allowable temperature for continuous-duty rating for the equipment and instrumentation cooled by this system is not exceeded. The safety-related Control Room Air Conditioning Subsystem consists of two independent and redundant trains that provide cooling of recirculated control room air. The design basis of the safety-related Control Room Air Conditioning Subsystem is to maintain the control room temperature for 30 days of continued occupancy. The safety-related chillers are designed to operate in conditions down to the design basis winter temperature. When the chiller units unload due to insufficient heat load on the system, each Control Room air Conditioning Subsystem remains operable. Surveillance to demonstrate OPERABILITY will verify each subsystem has the capability to maintain the control room area temperature less than the limiting equipment qualification temperature. The operational surveillance will be performed on a quarterly basis, requiring each safety-related Control Room Air Conditioning Subsystem to operate over a twenty-four hour period. This will ensure the safety related subsystem can remove the heat load based on daily cyclic outdoor air temperature.

The Control Room Air Conditioning fans are necessary to support both the operation of the Control Room Emergency Makeup Air and Filtration and the Control Room Air Conditioning Subsystems.

3/4.7.7 SNUBBERS

All snubbers are required OPERABLE to ensure that the structural integrity of the Reactor Coolant System and all other safety-related systems is maintained during and following a seismic or other event initiating dynamic loads.

Snubbers are classified and grouped by design and manufacturer but not by size. For example, mechanical snubbers utilizing the same design features of the 2-kip, 10-kip and 100-kip capacity manufactured by Company "A" are of the same type. The same design mechanical snubbers manufactured by Company "B" for the purposes of this Technical Specification would be of a different type, as would hydraulic snubbers from either manufacturer.

3/4.7.7 SNUBBERS (Continued)

A list of individual snubbers with detailed information of snubber location and size and of system affected shall be available at the plant in accordance with Section 50.71(c) of 10 CFR Part 50. The accessibility of each snubber shall be determined and approved by the Station Operation Review Committee (SORC). The determination shall be based upon the existing radiation levels and the expected time to perform a visual inspection in each snubber location as well as other factors associated with accessibility during plant operations (e.g., temperature, atmosphere, location, etc.), and the recommendations of Regulatory Guides 8.8 and 8.10. The addition or deletion of any hydraulic or mechanical snubber shall be made in accordance with Section 50.59 of 10 CFR Part 50.

3/4 ELECTRICAL POWER SYSTEMS

BASES

3/4.8.1, 3/4.8.2, and 3/4.8.3 A.C. SOURCES, D.C. SOURCES, and ONSITE POWER DISTRIBUTION

The OPERABILITY of the A.C. and D.C power sources and associated distribution systems during operation ensures that sufficient power will be available to supply the safety-related equipment required for: (1) the safe shutdown of the facility, and (2) the mitigation and control of accident conditions within the facility. The minimum specified independent and redundant A.C. and D.C. power sources and distribution systems satisfy the requirements of General Design Criterion 17 of Appendix A to 10 CFR Part 50.

The ACTION requirements specified for the levels of degradation of the power sources provide restriction upon continued facility operation commensurate with the level of degradation. The OPERABILITY of the power sources is consistent with the initial condition assumptions of the safety analyses and is based upon maintaining at least one redundant set of onsite A.C. and D.C. power sources and associated distribution systems OPERABLE during accident conditions coincident with an assumed loss-of-offsite power and single failure of the other onsite A.C. source. The A.C. and D.C. source allowable out-of-service times are based on Regulatory Guide 1.93, "Availability of Electrical Power Sources," December 1974. When one diesel generator is inoperable, there is an additional ACTION requirement to verify that all required systems, subsystems, trains, components and devices that depend on the remaining OPERABLE diesel generator as a source of emergency power are also OPERABLE, and that the steam-driven emergency feedwater pump is OPERABLE. This requirement is intended to provide assurance that a loss-of-offsite power event will not result in a complete loss of safety function of critical systems during the period one of the diesel generators is inoperable. The term, "verify," as used in this context means to administratively check by examining logs or other information to determine if certain components are out of service for maintenance or other reasons. It does not mean to perform the Surveillance Requirements needed to demonstrate the OPERABILITY of the component.

The OPERABILITY of the minimum specified A.C. and D.C. power sources and associated distribution systems during shutdown and refueling ensures that: (1) the facility can be maintained in the shutdown or refueling condition for extended time periods and (2) sufficient instrumentation and control capability is available for monitoring and maintaining the unit status.

The Surveillance Requirements for demonstrating the OPERABILITY of the diesel generators are in accordance with the recommendations of Regulatory Guides 1.9, "Selection of Diesel Generator Set Capacity for Standby Power Supplies," Revision 2, December 1979; 1.108, "Periodic Testing of Diesel Generator Units Used as Onsite Electric Power Systems at Nuclear Power Plants," Revision 1, August 1977, Errata September 1977; and 1.137, "Fuel-Oil Systems for Standby Generators." Revision 1, October 1979. Exceptions to these Regulatory Guides are noted in the UFSAR.

3/4.9 REFUELING OPERATIONS

BASES

3/4.9.1 BORON CONCENTRATION

The limit on the boron concentrations of the Reactor Coolant System (RCS) and the refueling canal/cavity during refueling ensures that the reactor remains subcritical during MODE 6. During refueling, the spent fuel pool water volumes and the reactor cavity water volumes will be connected when the fuel transfer gate valve is open. This configuration allows the bodies of water to be physically capable of being in contact, however, no effective mixing of the volumes occurs due to the constriction of the fuel transfer tube. The soluble boron concentration in each of these volumes is maintained greater than or equal to 2000 ppm boron, or equivalent to a K_{eff} less than or equal to 0.95 when the fuel transfer gate is open. However, the spent fuel pool water boron concentration is under administrative controls and not a technical specification. They are independently maintained at the appropriate boron concentration even though no intermixing of significance exists. The mixing caused by the RHR pumps (reactor cavity) or the SFP system pumps assures uniformity of boron in the separate volumes.

The soluble boron concentration offsets the core reactivity and is measured by chemical analysis of a representative sample of the coolant in each of the volumes. Plant procedures ensure the specified boron concentration in order to maintain an overall core reactivity of $k_{eff} \leq 0.95$ during fuel handling, with control rods and fuel assemblies assumed to be in the most adverse configuration (least negative reactivity) allowed by plant procedures.

GDC 26 of 10 CFR 50, Appendix A, requires that two independent reactivity control systems of different design principles be provided. One of these systems must be capable of holding the reactor core subcritical under cold conditions. The Chemical and Volume Control System (CVCS) is the system capable of maintaining the reactor subcritical in cold conditions by maintaining the boron concentration.

The reactor is brought to shutdown conditions before beginning operations to open the reactor vessel for refueling. After the RCS is cooled and depressurized and the vessel head is unbolted, the head is slowly removed to form the refueling cavity. The refueling canal and the refueling cavity are then flooded with borated water from the refueling water storage tank through the open reactor vessel by gravity feeding or by the use of the Residual Heat Removal (RHR) System pumps.

The pumping action of the RHR System in the RCS and the natural circulation due to thermal driving heads in the reactor vessel and refueling cavity mix the added solution of boric acid with the water in the refueling canal. The RHR System is in operation during refueling (see LCO 3.9.8.1, "Residual Heat Removal (RHR) and Coolant Circulation High Water Level," and LCO 3.9.8.2, "Residual Heat Removal (RHR) and Coolant Circulation — Low Water Level") to provide forced circulation in the RCS and assist in maintaining the boron concentrations in the RCS and the refueling canal/cavity at or above the limit specified in LCO 3.9.1.

3/4.9 REFUELING OPERATIONS

BASES

During refueling operations, the reactivity condition of the core is consistent with the initial conditions assumed for the boron dilution accident in the accident analysis and is conservative for MODE 6. The boron concentration limit specified is based on the core reactivity at the beginning of each fuel cycle (the end of refueling) and includes an uncertainty allowance.

The required boron concentration and the plant refueling procedures that verify the correct fuel loading plan (including full core mapping) ensure that the k_{eff} of the core will remain ≤ 0.95 during the refueling operation. Hence, at least 5% $\Delta k/k$ margin of safety is established during refueling.

Continuation of CORE ALTERATIONS or positive reactivity additions (including actions to reduce boron concentration) is contingent upon maintaining the unit in compliance with the LCO.

During refueling operations water may be transferred to the refueling canal/cavity or the RCS from different sources. Transfers or additions of water whose boron concentration exceeds the required refueling boron concentration are acceptable. Transfers or additions of water where the boron concentration is less than the required refueling boron concentration may be made, provided that these additions are administratively controlled to ensure that the refueling boron concentration requirements continue to be met. That is, the final concentration of boron in the total volume, after the addition of water less than the required refueling boron concentration, exceeds the required refueling boron concentration, or $k_{eff} \leq 0.95$. Also, these administrative controls ensure such transfers or additions of water will not substantially reduce the uniformity of boron concentration in the RCS or refueling canal.

Likewise, transferring water to the RCS or the refueling canal/cavity that is lower in temperature (down to the operability requirements of the RWST in MODE 6; 50 DEG F) than the water contained in those volumes is also acceptable. These minimum requirements for boron concentration and water temperature are also applicable to other MODE 6 Technical Specification ACTIONS that limit operations involving positive reactivity additions to ensure that the reactor remains subcritical and an adequate shutdown margin is maintained.

Suspension of CORE ALTERATIONS and positive reactivity additions shall not preclude moving a component to a safe position. In addition to immediately suspending CORE ALTERATIONS or positive reactivity additions, boration to restore the concentration must be initiated immediately.

In determining the required combination of boration flow rate and concentration, no unique Design Basis Event must be satisfied. The only requirement is to restore the boron concentration to its required value as soon as possible. In order to raise the boron concentration as soon as possible, the operator should begin boration with the best source available for unit conditions.

Once actions have been initiated, they must be continued until the boron concentration is restored. The restoration time depends on the amount of boron that must be injected to reach the required concentration.

3/4.9 REFUELING OPERATIONS

BASES

3/4.9.2 INSTRUMENTATION

The OPERABILITY of the Source Range Neutron Flux Monitors ensures that redundant monitoring capability is available to detect changes in the reactivity condition of the core.

3/4.9.3 DECAY TIME

The minimum requirement for reactor subcriticality prior to movement of irradiated fuel assemblies in the reactor vessel ensures that sufficient time has elapsed to allow the radioactive decay of the short-lived fission products. This decay time is consistent with the assumptions used in the safety analyses.

3/4.9.4 CONTAINMENT BUILDING PENETRATIONS

The Limiting Condition for Operation (LCO) limits the consequences of a fuel handling accident in containment by limiting the potential escape paths for fission product radioactivity released within containment. The LCO requires any penetration providing direct access from the containment atmosphere to the outside atmosphere to be closed except for the OPERABLE containment purge and exhaust penetrations, the approved alternate closure methods and the containment personnel airlock.

For the approved alternate closure methods, the LCO requires that a designated individual must be available to close or direct the remote closure of the penetration in the event of a fuel handling accident. "Available" means stationed at the penetration or performing activities controlled by a procedure on equipment associated with the penetration.

For the personnel airlocks (containment or equipment hatch), the LCO ensures that the airlock can be closed after containment evacuation in the event of a fuel handling accident. The requirement that the airlock door is capable of being closed requires that the door can be closed and is not blocked by objects that cannot be easily and quickly removed. As an example, the use of removable protective covers for the door seals and sealing surfaces is permitted. The requirement for a designated individual located outside of the airlock area available to lose the door following evacuation of the containment will minimize the release of radioactive material.

The fuel handling accident analysis inside containment assumes both of the personnel airlock doors are open and an additional 12" diameter penetration (or equivalent area) is open. The analysis is bounded by these assumptions since all of the available activity is released within a 2 hour period.

3/4.9 REFUELING OPERATIONS (Continued)

BASES

3/4.9.5 (THIS SPECIFICATION NUMBER IS NOT USED.)

3/4.9.6 (THIS SPECIFICATION NUMBER IS NOT USED.)

3/4.9.7 (THIS SPECIFICATION NUMBER IS NOT USED.)

3/4.9.8 RESIDUAL HEAT REMOVAL AND COOLANT CIRCULATION

The requirement that at least one residual heat removal (RHR) loop be in operation ensures that: (1) sufficient cooling capacity is available to remove decay heat and maintain the water in the reactor vessel below 140°F as required during the REFUELING MODE, and (2) sufficient coolant circulation is maintained through the core to minimize the effect of a boron dilution incident and prevent boron stratification.

The requirement to have two RHR loops OPERABLE when there is less than 23 feet of water above the reactor vessel flange ensures that a single failure of the operating RHR loop will not result in a complete loss of residual heat removal capability. With the reactor vessel head removed and at least 23 feet of water above the reactor pressure vessel flange, a large heat sink is available for core cooling. Thus, in the event of a failure of the operating RHR loop, adequate time is provided to initiate emergency procedures to cool the core.

3/4.9 REFUELING OPERATIONS (Continued)

BASES

3/4.9.9 CONTAINMENT PURGE AND EXHAUST ISOLATION SYSTEM

The OPERABILITY of this system ensures that the containment vent and purge penetrations will be automatically isolated upon detection of high radiation levels within the containment. The OPERABILITY of this system is required to restrict the release of radioactive material from the containment atmosphere to the environment.

3/4.9.10 and 3/4.9.11 WATER LEVEL - REACTOR VESSEL and STORAGE POOL

The restrictions on minimum water level ensure that sufficient water depth is available to remove 99% of the assumed 10% iodine gap activity released from the rupture of an irradiated fuel assembly. The minimum water depth is consistent with the assumptions of the safety analysis.

3/4.9.12 FUEL STORAGE BUILDING EMERGENCY AIR CLEANING SYSTEM

The limitations on the Fuel Storage Building Emergency Air Cleaning System ensure that all radioactive material released from an irradiated fuel assembly will be filtered through the HEPA filters and charcoal adsorber prior to discharge to the atmosphere. Operation of the system with the heaters operating for at least 10 continuous hours in a 31-day period is sufficient to reduce the buildup of moisture on the adsorbers and HEPA filters. The OPERABILITY of this system and the resulting iodine removal capacity are consistent with the assumptions of the safety analyses. ANSI N510-1980 will be used as a procedural guide for surveillance testing.

3/4.9.13 SPENT FUEL ASSEMBLY STORAGE

Restrictions on placement of fuel assemblies of certain enrichments within the Spent Fuel Pool is dictated by Figure 3.9-1. These restrictions ensure that the K_{eff} of the Spent Fuel Pool will always remain less than 0.95 assuming the pool to be flooded with unborated water. The restrictions delineated in Figure 3.9-1 and the action statement are consistent with the criticality safety analysis performed for the Spent Fuel Pool as documented in the FSAR.

3/4.9.14 NEW FUEL ASSEMBLY STORAGE

Restrictions on placement of fuel assemblies of certain enrichments within the New Fuel Storage Vault is dictated by Specification 3/4.9.14. These restrictions ensure that the K_{eff} of the New Fuel Storage Vault will always remain less than 0.95 assuming the area to be flooded with unborated water. In addition, these restrictions ensure that the K_{eff} of the New Fuel Storage Vault will always remain less than 0.98 when aqueous foam moderation is assumed. The restrictions delineated in Specification 3/4.9.14 and the action statement are consistent with the criticality safety analysis performed for the New Fuel Storage Vault as documented in the FSAR.