

### 3.3 INSTRUMENTATION

#### 3.3.7.1 Control Room Emergency Filter (CREF) System Instrumentation

LCO 3.3.7.1      The CREF System instrumentation for each Function in Table 3.3.7.1-1 shall be OPERABLE.

APPLICABILITY:    According to Table 3.3.7.1-1

#### ACTIONS

-----NOTE-----  
Separate Condition entry is allowed for each channel.  
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CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more channels inoperable.	A.1 Place channel in trip.	12 hours for Functions 1 and 2  <u>AND</u> 24 hours for Function 3
B. One or more Functions with CREF System initiation capability not maintained.	B.1 Restore CREF System initiation capability.	1 hour
C. Required Action and associated Completion Time not met.	C.1 Initiate CREF System.  <u>OR</u> C.2 Declare CREF System inoperable.	1 hour   1 hour

## SURVEILLANCE REQUIREMENTS

### NOTES

1. Refer to Table 3.3.7.1-1 to determine which SRs apply for each CREF Function.
2. When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours provided the associated Function maintains CREF initiation capability.

SURVEILLANCE		FREQUENCY
SR 3.3.7.1.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.7.1.2	Perform CHANNEL FUNCTIONAL TEST.	92 days
SR 3.3.7.1.3	Perform CHANNEL CALIBRATION.	18 months
SR 3.3.7.1.4	Perform LOGIC SYSTEM FUNCTIONAL TEST.	18 months

Table 3.3.7.1-1 (page 1 of 1)  
Control Room Emergency Filter System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Reactor Vessel Water Level - Low (Level 3)	1,2,3, (a)	4	SR 3.3.7.1.1 SR 3.3.7.1.2 SR 3.3.7.1.3 SR 3.3.7.1.4	$\geq 3$ inches
2. Drywell Pressure - High	1,2,3	4	SR 3.3.7.1.2 SR 3.3.7.1.3 SR 3.3.7.1.4	$\leq 1.84$ psig
3. Reactor Building Ventilation Exhaust Plenum Radiation - High	1,2,3, (a),(b)	4	SR 3.3.7.1.1 SR 3.3.7.1.2 SR 3.3.7.1.3 SR 3.3.7.1.4	$\leq 49$ mR/hr

(a) During operations with a potential for draining the reactor vessel.

(b) During CORE ALTERATIONS and during movement of irradiated fuel assemblies in the secondary containment.

### B 3.3 INSTRUMENTATION

#### B 3.3.7.1 Control Room Emergency Filter (CREF) System Instrumentation

##### BASES

##### BACKGROUND

The CREF System is designed to provide a radiologically controlled environment to ensure the habitability of the control room for the safety of control room operators under all plant conditions. The instrumentation and controls for the CREF System automatically isolate the normal ventilation intake and initiate action to pressurize the main control room and filter incoming air to minimize the infiltration of radioactive material into the control room environment.

In the event of a loss of coolant accident (LOCA) signal (Reactor Vessel Water Level — Low, Level 3 or Drywell Pressure — High) or Reactor Building Ventilation Exhaust Plenum Radiation — High signal, the normal control room inlet supply damper closes and the CREF System is automatically started in the emergency bypass mode. The air drawn in from the outside passes through a high efficiency filter and a charcoal filter in sufficient volume to maintain the control room slightly pressurized with respect to the adjacent areas.

The CREF System instrumentation has two trip systems. Each trip system includes the sensors, relays, and switches necessary to cause initiation of the CREF System. Each trip system receives input from each of the Functions listed above (each sensor sends a signal to both trip systems). The Reactor Vessel Water Level — Low, Level 3, Drywell Pressure — High, and Reactor Building Ventilation Exhaust Plenum Radiation — High are each arranged in a one-out-of-two taken twice logic for each trip system. The channels include electronic and electrical equipment (e.g., switches and trip relays) that compares measured input signals with pre-established setpoints. When the setpoint is exceeded, the channel output relay actuates, which then outputs a CREF System initiation signal to the initiation logic.

## BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY      The ability of the CREF System to maintain the habitability of the control room is explicitly assumed for certain accidents as discussed in the USAR safety analyses (Refs. 1, 2, and 3). CREF System operation ensures that the radiation exposure of control room personnel, through the duration of any one of the postulated accidents that assumes CREF System operation, does not exceed the limits set by GDC 19 of 10 CFR 50, Appendix A.

CREF System instrumentation satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii) (Ref. 4).

The OPERABILITY of the CREF System instrumentation is dependent upon the OPERABILITY of the individual instrumentation channel Functions specified in Table 3.3.7.1-1. Each Function must have the required number of OPERABLE channels, with their setpoints within the specified Allowable Values. A channel is inoperable if its actual trip setpoint is not within its required Allowable Value. The actual setpoint is calibrated consistent with applicable setpoint methodology assumptions.

Allowable Values are specified for each CREF System Function specified in the Table. Nominal trip setpoints are specified in the setpoint calculations. The setpoint calculations are performed using methodology described in NEDC-31336P-A, "General Electric Instrument Setpoint Methodology," dated September 1996. The nominal setpoints are selected to ensure that the setpoints do not exceed the Allowable Value between successive CHANNEL CALIBRATIONS. Operation with a trip setpoint less conservative than the nominal trip setpoint, but within its Allowable Value, is acceptable. Trip setpoints are those predetermined values of output at which an action should take place. The setpoints are compared to the actual process parameter (e.g., reactor vessel water level), and when the measured output value of the process parameter exceeds the setpoint, the associated device (e.g., trip relay) changes state. The analytic limits are derived from the limiting values of the process parameters obtained from the safety analysis. The Allowable Values are derived from the analytic limit, corrected for calibration, process, and some of the instrument errors. The trip setpoints are then determined accounting for the remaining instrument errors (e.g., drift). The trip setpoints derived in this manner provide adequate protection because instrumentation uncertainties, process effects, calibration tolerances, instrument drift, and severe environment errors (for channels that must function in harsh environments as defined by 10 CFR 50.49) are accounted for.

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APPLICABLE  
SAFETY ANALYSES,  
LCO, and  
APPLICABILITY  
(continued)

The specific Applicable Safety Analyses, LCO, and Applicability discussions are listed below on a Function by Function basis.

1. Reactor Vessel Water Level — Low (Level 3)

Low reactor pressure vessel (RPV) water level indicates that the capability of cooling the fuel may be threatened. A low reactor vessel water level could indicate a LOCA and will automatically initiate the CREF System, since this could be a precursor to a potential radiation release and subsequent radiation exposure to control room personnel.

Reactor Vessel Water Level — Low (Level 3) signals are initiated from level switches that sense the difference between the pressure due to a constant column of water (reference leg) and the pressure due to the actual water level (variable leg) in the vessel. Eight channels of Reactor Vessel Water Level — Low (Level 3) Function are available and are required to be OPERABLE in MODES 1, 2, and 3 to ensure that no single instrument failure can preclude CREF System initiation.

The Reactor Vessel Water Level — Low (Level 3) Allowable Value was chosen to be the same as the RPS Level scram Allowable Value (LCO 3.3.1.1) to enable initiation of the CREF System at the earliest indication of a breach in the nuclear system process barrier, yet far enough below normal operational levels to avoid spurious initiation.

The Reactor Vessel Water Level — Low (Level 3) Function is required to be OPERABLE in MODES 1, 2, and 3, and during operations with a potential for draining the reactor vessel (OPDRVs) to ensure that the Control Room personnel are protected during a LOCA. In MODES 4 and 5 at times other than OPDRVs, the probability of a vessel draindown event resulting in the release of radioactive material to the environment is minimal. Therefore, this Function is not required in other MODES and specified conditions.

2. Drywell Pressure — High

High drywell pressure can indicate a break in the reactor coolant pressure boundary. A high drywell pressure signal could indicate a LOCA and will automatically initiate the CREF System, since this could be a precursor to

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BASES

APPLICABLE  
SAFETY ANALYSES,  
LCO, and  
APPLICABILITY  
(continued)

a potential radiation release and subsequent radiation exposure to control room personnel.

Drywell Pressure — High signals are initiated from pressure switches that sense drywell pressure. Eight channels of Drywell Pressure — High Function are available and are required to be OPERABLE to ensure that no single instrument failure can preclude performance of the isolation function. The Drywell Pressure — High Allowable Value was chosen to be the same as the ECCS Drywell Pressure — High Function Allowable Value (LCO 3.3.5.1).

The Drywell Pressure — High Function is required to be OPERABLE in MODES 1, 2, and 3 to ensure that control room personnel are protected in the event of a LOCA. In MODES 4 and 5, the Drywell Pressure — High Function is not required since there is insufficient energy in the reactor to pressurize the drywell to the Drywell Pressure — High setpoint.

3. Reactor Building Ventilation Exhaust Plenum Radiation — High

High radiation in the refueling floor area could be the result of a fuel handling accident. A refueling floor high radiation signal will automatically initiate the CREF System, since this radiation release could result in radiation exposure to control room personnel.

The Reactor Building Exhaust Plenum Radiation — High signals are initiated from radiation detectors that are located such that they can monitor the radioactivity of gas flowing through the reactor building exhaust plenum. The signal from each detector is input to an individual monitor whose trip outputs are assigned to an isolation channel in each trip system. Four channels of Reactor Building Ventilation Exhaust Plenum Radiation — High Function are available and are required to be OPERABLE to ensure that no single instrument failure can preclude the CREF System initiation. The Allowable Value was chosen to promptly detect gross failure of the fuel cladding.

The Reactor Building Ventilation Exhaust Plenum Radiation — High Function is required to be OPERABLE in MODES 1, 2, and 3 and during movement of irradiated fuel assemblies in the secondary containment, CORE ALTERATIONS, and operations with a potential for draining the reactor vessel (OPDRVs), to ensure control room personnel are protected during a pipe break resulting in significant releases of radioactive steam

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APPLICABILITY  
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and gas, fuel handling event, or vessel draindown event. During MODES 4 and 5, when these specified conditions are not in progress (e.g., CORE ALTERATIONS), the probability of a pipe break resulting in significant releases of radioactive steam and gas or fuel damage is low; thus, the Function is not required.

ACTIONS

A Note has been provided to modify the ACTIONS related to CREF System instrumentation channels. Section 1.3, Completion Times, specifies that once a Condition has been entered, subsequent divisions, subsystems, components, or variables expressed in the Condition, discovered to be inoperable or not within limits, will not result in separate entry into the Condition. Section 1.3 also specifies that Required Actions of the Condition continue to apply for each additional failure, with Completion Times based on initial entry into the Condition. However, the Required Actions for inoperable CREF System instrumentation channels provide appropriate compensatory measures for separate inoperable channels. As such, a Note has been provided that allows separate Condition entry for each inoperable CREF System instrumentation channel.

A.1

Because of the diversity of sensors available to provide isolation signals and the common interface with the Secondary Containment isolation Instrumentation, allowable out of service time of 12 hours for Functions 1 and 2, and 24 hours for Function 3, has been shown to be acceptable (Refs. 5, 6, and 7) to permit restoration of any inoperable channel to OPERABLE status. However, this out of service time is only acceptable provided the associated Function is still maintaining CREF System initiation capability. If the inoperable channel cannot be restored to OPERABLE status within the Completion Time, the channel must be placed in the tripped condition per Required Action A.1. Placing the inoperable channel in trip would conservatively compensate for the inoperability, restore capability to accommodate a single failure in the trip system, and allow operation to continue. Alternately, if it is not desired to place the channel in trip, Condition C must be entered and its Required Actions taken.

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ACTIONS  
(continued)

B.1

Required Action B.1 is intended to ensure that appropriate actions are taken if multiple, inoperable, untripped channels within the same Function result in a complete loss of CREF System initiation capability. A Function is considered to be maintaining CREF System initiation capability when sufficient channels are OPERABLE or in trip, such that at least one trip system will generate a trip signal from the given Function on a valid signal.

The 1 hour Completion Time is acceptable because it minimizes risk while allowing time for restoration or tripping of channels.

If the CREF System initiation capability cannot be restored within the Completion Time, Condition C must be entered and its Required Actions taken.

C.1

With any Required Action and associated Completion Time of Condition A or B not met, the CREF System must be placed in operation per Required Action C.1 to ensure that control room personnel will be protected in the event of a Design Basis Accident which assumes a CREF System initiation. The method used to place the CREF System in operation must provide for automatically re-initiating the system upon restoration of power following a loss of power to the CREF System. Alternatively, if it is not desired to start the CREF System, the CREF System must be declared inoperable within 1 hour.

The 1 hour Completion Time is intended to allow the operator time to place the CREF System in operation. The 1 hour completion time is acceptable because it minimizes risk while allowing time for restoration or tripping of channels, for placing the CREF System in operation, or for entering the applicable Conditions and Required Actions for the inoperable CREF System.

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BASES

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SURVEILLANCE  
REQUIREMENTS

As noted at the beginning of the SRs, the SRs for each CREF System instrumentation Function are located in the SRs column of Table 3.3.7.1-1.

The Surveillances are modified by a Note to indicate that when a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours, provided the associated Function maintains CREF System initiation capability. Upon completion of the Surveillance, or expiration of the 6 hour allowance, the channel must be returned to OPERABLE status or the applicable Condition entered and Required Actions taken. This Note is based on the reliability analysis (Refs. 5, 6, and 7) assumption of the average time required to perform channel surveillance. That analysis demonstrated that the 6 hour testing allowance does not significantly reduce the probability that the CREF System will initiate when necessary.

SR 3.3.7.1.1

Performance of the CHANNEL CHECK once every 12 hours ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the instrument channels could be an indication of excessive instrument drift in one of the channels or something even more serious. A CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying the instrumentation continues to operate properly between each CHANNEL CALIBRATION.

Agreement criteria are determined by the plant staff, based on a combination of the channel instrument uncertainties, including indication and readability. If a channel is outside the criteria, it may be an indication that the instrument has drifted outside its limit.

The Frequency is based upon operating experience that demonstrates channel failure is rare. The CHANNEL CHECK supplements less formal, but more frequent, checks of channel status during normal operational use of the displays associated with channels required by the LCO.

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SURVEILLANCE  
REQUIREMENTS  
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SR 3.3.7.1.2

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the channel will perform the intended function.

Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology.

The Frequency of 92 days is based on the reliability analyses of References 5, 6, and 7.

SR 3.3.7.1.3

A CHANNEL CALIBRATION is a complete check of the instrument loop and the sensor. This test verifies the channel responds to the measured parameter within the necessary range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations consistent with the plant specific setpoint methodology.

The Frequency is based upon the assumption of an 18 month calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis.

SR 3.3.7.1.4

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required initiation logic for a specific channel. The system functional testing performed in LCO 3.7.4, "Control Room Emergency Filter (CREF) System," overlaps this Surveillance to provide complete testing of the assumed safety function.

The 18 month Frequency is based on the need to perform the Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown that these components usually pass the Surveillance when performed at the 18 month Frequency.

BASES

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REFERENCES

1. USAR, Section X-10.4.
  2. USAR, Section XIV-6.3.
  3. USAR, Section XIV-6.4.
  4. 10 CFR 50.36(c)(2)(ii).
  5. GENE-770-06-1, "Bases for Changes to Surveillance Test Intervals and Allowed Out-of-Service Times for Selected Instrumentation Technical Specifications," February 1991.
  6. NEDC-31677P-A, "Technical Specification Improvement Analysis for BWR Isolation Actuation Instrumentation," July 1990.
  7. NEDC-30851P-A Supplement 2, "Technical Specifications Improvement Analysis for BWR Isolation Instrumentation Common to RPS and ECCS Instrumentation," March 1989.
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BASES

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ACTIONS

B.1, B.2.1, B.2.2.1, and B.2.2.2 (continued)

The Completion Time of once every 4 hours is the time needed to take and analyze a sample. The 12 hour Completion Time is reasonable, based on operating experience, to isolate the main steam lines in an orderly manner and without challenging plant systems. Also, the allowed Completion Times for Required Actions B.2.2.1 and B.2.2.2 for placing the unit in MODES 3 and 4 are reasonable, based on operating experience, to achieve the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

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SURVEILLANCE  
REQUIREMENTS

SR 3.4.6.1

This Surveillance is performed to ensure iodine remains within limit during normal operation. The 7 day Frequency is adequate to trend changes in the iodine activity level.

This SR is modified by a Note that requires this Surveillance to be performed only in MODE 1 because the level of fission products generated in other MODES is much less.

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REFERENCES

1. 10 CFR 100.11, 1973.
  2. USAR, Section XIV-8.1.
  3. USAR, Section XIV-6.5.
  4. 10 CFR 50, Appendix A, GDC 19.
  5. 10 CFR 50.36(c)(2)(ii).
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## B 3.6 CONTAINMENT SYSTEMS

### B 3.6.4.1 Secondary Containment

#### BASES

##### BACKGROUND

The function of the secondary containment is to contain, dilute, and hold up fission products that may leak from primary containment following a Design Basis Accident (DBA) to limit fission product release to the environment. In conjunction with operation of the Standby Gas Treatment (SGT) System and closure of certain valves whose lines penetrate the secondary containment, the secondary containment is designed to reduce the activity level of the fission products released to the environment and to limit fission products that are released during certain operations that take place inside primary containment, when primary containment is not required to be OPERABLE, or that take place outside primary containment.

The secondary containment is a structure that completely encloses the primary containment and those components that may be postulated to contain primary system fluid. This structure forms a control volume that serves to hold up and dilute the fission products. It is possible for the pressure in the control volume to rise relative to the environmental pressure (e.g., due to pump and motor heat load additions). To prevent ground level exfiltration while allowing the secondary containment to be designed as a conventional structure, the secondary containment requires support systems to maintain the control volume pressure at less than the external pressure. Requirements for these systems are specified separately in LCO 3.6.4.2, "Secondary Containment Isolation Valves (SCIVs)," and LCO 3.6.4.3, "Standby Gas Treatment (SGT) System."

##### APPLICABLE SAFETY ANALYSES

There are two principal accidents for which credit is taken for secondary containment OPERABILITY. These are a loss of coolant accident (LOCA) (Ref. 1) and a fuel handling accident inside secondary containment (Ref. 2). The secondary containment performs no active function in response to each of these limiting events; however, its leak tightness is required to ensure that fission products entrapped within the secondary containment structure following secondary containment isolation will be treated by the SGT System prior to discharge to the environment.

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APPLICABLE Secondary containment satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii)  
SAFETY ANALYSES, (Ref. 3).  
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LCO An OPERABLE secondary containment provides a control volume into which fission products that leak from primary containment, or are released from the reactor coolant pressure boundary components located in secondary containment, following secondary containment isolation, can be processed prior to release to the environment. For the secondary containment to be considered OPERABLE, it must have adequate leak tightness to ensure that the required vacuum can be established and maintained.

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APPLICABILITY In MODES 1, 2, and 3, a LOCA could lead to a fission product release to primary containment that leaks to secondary containment. Therefore, secondary containment OPERABILITY is required during the same operating conditions that require primary containment OPERABILITY.

In MODES 4 and 5, the probability and consequences of the LOCA are reduced due to the pressure and temperature limitations in these MODES. Therefore, maintaining secondary containment OPERABLE is not required in MODE 4 or 5 to ensure a control volume, except for other situations for which significant releases of radioactive material can be postulated, such as during operations with a potential for draining the reactor vessel (OPDRVs), during CORE ALTERATIONS, or during movement of irradiated fuel assemblies in the secondary containment.

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ACTIONS A.1

If secondary containment is inoperable, it must be restored to OPERABLE status within 4 hours. The 4 hour Completion Time provides a period of time to correct the problem that is commensurate with the importance of maintaining secondary

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## B 3.6 CONTAINMENT SYSTEMS

### B 3.6.4.2 Secondary Containment Isolation Valves (SCIVs)

#### BASES

##### BACKGROUND

The function of the SCIVs, in combination with other accident mitigation systems, is to limit fission product release during and following postulated Design Basis Accidents (DBAs) (Refs. 1 and 2). Secondary containment isolation within the time limits specified for those isolation valves designed to close automatically ensures that fission products that leak from primary containment following a DBA, or that are released during certain operations when primary containment is not required to be OPERABLE or take place outside primary containment, are maintained within applicable limits.

The OPERABILITY requirements for SCIVs help ensure that an adequate secondary containment boundary is maintained during and after an accident by minimizing potential paths to the environment. These isolation devices consist of either passive devices or active (automatic) devices. Manual valves, de-activated automatic valves secured in their closed position (including check valves with flow through the valve secured), and blind flanges are considered passive devices.

Automatic SCIVs close on a secondary containment isolation signal to establish a boundary for untreated radioactive material within secondary containment following a DBA or other accidents.

Other penetrations are isolated by the use of valves in the closed position or blind flanges.

##### APPLICABLE SAFETY ANALYSES

The SCIVs must be OPERABLE to ensure the secondary containment barrier to fission product releases is established. The principal accidents for which the secondary containment boundary is required are a loss of coolant accident (Ref. 3) and a fuel handling accident (Ref. 4). The secondary containment performs no active function in response to either of these limiting events, but the boundary established by SCIVs is required to ensure that leakage from the primary containment is processed by the Standby Gas Treatment (SGT) System following secondary containment isolation, before being released to the environment.

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BASES

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APPLICABLE SAFETY ANALYSES, (continued) Maintaining SCIVs OPERABLE with isolation times within limits ensures that fission products will remain trapped inside secondary containment following secondary containment isolation so that they can be treated by the SGT System prior to discharge to the environment.

SCIVs satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii) (Ref. 5).

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LCO

SCIVs form a part of the secondary containment boundary. The SCIV safety function is related to control of offsite radiation releases resulting from DBAs.

The power operated automatic isolation valves are considered OPERABLE when their isolation times are within limits and the valves actuate on an automatic isolation signal. The valves covered by this LCO, along with their associated stroke times, are listed in Reference 6.

The normally closed isolation valves or blind flanges are considered OPERABLE when manual valves are closed or open in accordance with appropriate administrative controls, automatic SCIVs are de-activated and secured in their closed position, and blind flanges are in place. These passive isolation valves or devices are listed in Reference 6.

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APPLICABILITY

In MODES 1, 2, and 3, a DBA could lead to a fission product release to the primary containment that leaks to the secondary containment. Therefore, the OPERABILITY of SCIVs is required.

In MODES 4 and 5, the probability and consequences of these events are reduced due to pressure and temperature limitations in these MODES. Therefore, maintaining SCIVs OPERABLE is not required in MODE 4 or 5, except for other situations under which significant radioactive releases can be postulated, such as during operations with a potential for draining the reactor vessel (OPDRVs), during CORE

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BASES

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**SURVEILLANCE  
REQUIREMENTS**  
(continued)

**SR 3.6.4.2.3**

Verifying that each automatic SCIV closes on a secondary containment isolation signal is required to minimize leakage of radioactive material from secondary containment following a DBA or other accidents. This SR ensures that each automatic SCIV will actuate to the isolation position on a secondary containment isolation signal. The LOGIC SYSTEM FUNCTIONAL TEST in LCO 3.3.6.2, "Secondary Containment Isolation Instrumentation," overlaps this SR to provide complete testing of the safety function. The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown these components usually pass the Surveillance when performed at the 18 month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

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REFERENCES

1. USAR, Section V-3.0.
  2. USAR, Section XIV-6.0.
  3. USAR, Section XIV-6.3.
  4. USAR, Section XIV-6.4
  5. 10 CFR 50.36(c)(2)(ii).
  6. Technical Requirements Manual.
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## B 3.6 CONTAINMENT SYSTEMS

### B 3.6.4.3 Standby Gas Treatment (SGT) System

#### BASES

##### BACKGROUND

The SGT System is required by USAR, Appendix F (Ref. 1). The function of the SGT System is to ensure that radioactive materials that leak from the primary containment into the secondary containment following a Design Basis Accident (DBA) and secondary containment isolation are filtered and adsorbed prior to exhausting to the environment.

The SGT System consists of two fully redundant subsystems, each with its own set of ductwork, dampers, charcoal filter train, and controls. Both SGT subsystems share a common inlet plenum. This inlet plenum is connected to the reactor building exhaust plenum, the primary containment, and the HPCI turbine gland seal exhauster. Both SGT subsystems exhaust to the elevated release point (ERP) tower through a common exhaust duct served by two 100% capacity system fans. Both fans automatically start on a secondary containment isolation signal.

The SGT subsystem fan suctions are cross connected by a single duct and a throttled and locked manual cross tie valve to accommodate decay heat removal. SGT room air enters the train suction through a check valve and air operated damper, is drawn through the filter removing decay heat, passes through the cross tie ductwork to the opposite SGT subsystem fan, and is exhausted to the ERP tower.

Each charcoal filter train consists of (components listed in order of the direction of the air flow):

- a. A demister or moisture separator;
- b. A rough prefilter;
- c. An electric heater;
- d. A high efficiency particulate air (HEPA) filter;
- e. A charcoal adsorber;
- f. A second HEPA filter; and

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## B 3.7 PLANT SYSTEMS

### B 3.7.4 Control Room Emergency Filter System

#### BASES

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##### BACKGROUND

The CREF System provides a radiologically controlled environment from which the unit can be safely operated following a Design Basis Accident (DBA).

The safety related function of the CREF System includes a single high efficiency air filtration system for emergency treatment of recirculated air or outside supply air. The system consists of a prefilter, a high efficiency particulate air (HEPA) filter, an activated charcoal adsorber section, a supply fan, an emergency booster fan, an exhaust booster fan, and the associated ductwork and dampers. Prefilters and HEPA filters remove particulate matter, which may be radioactive. The charcoal adsorbers provide a holdup period for gaseous iodine, allowing time for decay.

The CREF System is a standby system. Upon receipt of the initiation signal(s) (indicative of conditions that could result in radiation exposure to control room personnel), the CREF System automatically switches to the emergency bypass mode of operation to minimize infiltration of contaminated air into the control room. A system of dampers isolates the control room, and the recirculated air is routed through the filter system. Outside air is taken in at the normal ventilation intake and is mixed with the recirculated air after being passed through the charcoal adsorber filter for removal of airborne radioactive particles.

The CREF System is designed to maintain the control room environment for a 200 man day continuous occupancy after a DBA without exceeding 5 rem whole body dose or its equivalent to any part of the body. The CREF System will pressurize the control room to  $\geq 0.1$  inches water gauge to prevent infiltration of air from surrounding buildings and the outside atmosphere. CREF System operation in maintaining control room habitability is discussed in the USAR, Chapters X and XIV, (Refs. 1 and 2, respectively).

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BASES (continued)

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**APPLICABLE SAFETY ANALYSES** The ability of the CREF System to maintain the habitability of the control room is an explicit assumption for the safety analyses presented in the USAR, Chapters X and XIV (Refs. 1 and 2, respectively). The CREF System is assumed to operate following a loss of coolant accident and a fuel handling accident.

The CREF System satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii) (Ref. 4).

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**LCO** The CREF System is required to be OPERABLE, since total system failure could result in exceeding a dose of 5 rem to the control room operators in the event of a DBA.

The CREF System is considered OPERABLE when the individual components necessary to control operator exposure are OPERABLE. The system is considered OPERABLE when its associated:

- a. Fans are OPERABLE (one supply fan, the emergency booster fan and the exhaust booster fan);
- b. HEPA filter and charcoal adsorber are not excessively restricting flow and are capable of performing their filtration functions; and
- c. Ductwork, valves, and dampers are OPERABLE, and air circulation can be maintained.

In addition, the control room boundary must be maintained, including the integrity of the walls, floors, ceilings, ductwork, and access doors, such that the pressurization limit of SR 3.7.4.4 can be met. However, it is acceptable for access doors to be open for normal control room entry and exit, and not consider it to be a failure to meet the LCO.

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## B 3.9 REFUELING OPERATIONS

### B 3.9.6 Reactor Pressure Vessel (RPV) Water Level

#### BASES

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**BACKGROUND** The movement of fuel assemblies or handling of control rods within the RPV requires a minimum water level of 21 ft above the top of the RPV flange. During refueling, this maintains a sufficient water level in the reactor vessel cavity. Sufficient water is necessary to retain iodine fission product activity in the water in the event of a refueling accident (Refs. 1 and 2). Sufficient iodine activity would be retained to limit offsite doses from the accident to well below the guidelines set forth in 10 CFR 100.11 (Ref. 3).

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**APPLICABLE SAFETY ANALYSES** During movement of fuel assemblies or handling of control rods, the water level in the RPV is an initial condition design parameter in the analysis of a refueling accident in containment postulated by Reference 1. A minimum water level of 21 ft allows a decontamination factor of 100 to be used in the accident analysis for halogens (Ref. 1). This relates to the assumption that 99% of the total halogens released from the pellet to cladding gap of all the dropped fuel assembly rods is retained by the water. The fuel pellet to cladding gap is assumed to contain 10% of the total fuel rod iodine inventory (Ref. 1).

Analysis of the refueling accident inside containment is described in Reference 1. With a minimum water level of 21 ft and a minimum decay time of 67 hours prior to fuel handling, the analysis and test programs demonstrate that the iodine release due to a postulated refueling accident is adequately captured by the water and that offsite doses are maintained within allowable limits (Ref. 3). The worst case assumptions include the dropping of the irradiated fuel assembly being handled onto the reactor core loaded with irradiated fuel assemblies. The possibility exists of the dropped assembly striking the RPV flange and releasing fission products. Therefore, the minimum depth for water coverage to ensure

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