

Containment Vent Isolation Instrumentation  
3.3.6

3.3 INSTRUMENTATION

3.3.6 Containment Vent Isolation Instrumentation

LCO 3.3.6 The Containment Vent Isolation instrumentation for each Function in Table 3.3.6-1 shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4,  
During movement of irradiated fuel assemblies within  
containment.

ACTIONS

-----NOTE-----  
Separate Condition entry is allowed for each Function.  
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CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One radiation monitoring channel inoperable.	A.1 Restore the affected channel to OPERABLE status.	4 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>C. -----NOTE----- Only applicable during movement of irradiated fuel assemblies within containment. -----</p> <p>One or more Functions with one or more manual or automatic actuation trains inoperable.</p> <p><u>OR</u></p> <p>Two radiation monitoring channels inoperable.</p> <p><u>OR</u></p> <p>Required Action and associated Completion Time for Condition A not met.</p>	<p>C.1 Place and maintain containment purge and exhaust valves in closed position.</p> <p><u>OR</u></p> <p>C.2 Enter applicable Conditions and Required Actions of LCO 3.9.4, "Containment Penetrations," for containment purge and exhaust isolation valves made inoperable by isolation instrumentation.</p>	<p>Immediately</p> <p>Immediately</p>

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. One or more Functions with two channels or two trains inoperable.	B.1.1 Place one CREVS train in emergency radiation protection mode.	Immediately
	<u>AND</u>	
	B.1.2 Enter applicable Conditions and Required Actions for one CREVS train made inoperable by inoperable CREVS actuation instrumentation.	Immediately
	<u>OR</u>	
	B.2 Place both trains in emergency radiation protection mode.	Immediately
C. Required Action and associated Completion Time for Condition A or B not met in MODE 1, 2, 3, or 4.	C.1 Be in MODE 3.	6 hours
	<u>AND</u> C.2 Be in MODE 5.	36 hours
D. Required Action and associated Completion Time for Condition A or B not met during movement of irradiated fuel assemblies.	D.1 Suspend movement of irradiated fuel assemblies.	Immediately

(continued)

### 3.7 PLANT SYSTEMS

#### 3.7.10 Control Room Emergency Ventilation System (CREVS)

LCO 3.7.10 Two CREVS trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, 4, 5, and 6  
During movement of irradiated fuel assemblies.

#### ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One CREVS train inoperable.	A.1 Restore CREVS train to OPERABLE status.	7 days
B. Required Action and associated Completion Time of Condition A not met in MODE 1, 2, 3, or 4.	B.1 Be in MODE 3.	6 hours
	<u>AND</u> B.2 Be in MODE 5.	36 hours
C. Required Action and associated Completion Time of Condition A not met in MODE 5 or 6, or during movement of irradiated fuel assemblies.	C.1 Place OPERABLE CREVS train in emergency mode.	Immediately
	<u>OR</u> C.2 Suspend movement of irradiated fuel assemblies.	Immediately

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Two CREVS trains inoperable in MODE 1, 2, 3, or 4 due to actions taken as a result of a tornado warning.	D.1 Restore one CREVS train to OPERABLE status.	8 hours
E. Two CREVS trains inoperable in MODE 5 or 6, or during movement of irradiated fuel assemblies.	E.1 Suspend movement of irradiated fuel assemblies.	Immediately
F. Two CREVS trains inoperable in MODE 1, 2, 3, or 4 for reasons other than Condition D.	F.1 Enter LCO 3.0.3.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.7.10.1 Operate each CREVS train for $\geq 15$ minutes.	31 days
SR 3.7.10.2 Perform required CREVS filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with VFTP

(continued)

### 3.7 PLANT SYSTEMS

#### 3.7.11 Control Room Emergency Air Temperature Control System (CREATCS)

LCO 3.7.11 Two CREATCS trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, 4, 5, and 6  
During movement of irradiated fuel assemblies.

#### ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One CREATCS train inoperable.	A.1 Restore CREATCS train to OPERABLE status.	30 days
B. Required Action and associated Completion Time of Condition A not met in MODE 1, 2, 3, or 4.	B.1 Be in MODE 3. <u>AND</u>	6 hours
	B.2 Be in MODE 5.	36 hours
C. Required Action and associated Completion Time of Condition A not met in MODE 5 or 6, or during movement of irradiated fuel assemblies.	C.1 Place OPERABLE CREATCS train in operation. <u>OR</u>	Immediately
	C.2 Suspend movement of irradiated fuel assemblies.	Immediately

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Two CREATCS trains inoperable in MODE 5 or 6, or during movement of irradiated fuel assemblies.	D.1 Suspend movement of irradiated fuel assemblies.	Immediately
E. Two CREATCS trains inoperable in MODE 1, 2, 3, or 4.	E.1 Enter LCO 3.0.3.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.7.11.1 Verify each CREATCS train has the capability to remove the assumed heat load.	18 months

### 3.9 REFUELING OPERATIONS

#### 3.9.4 Containment Penetrations

- LCO 3.9.4            The containment penetrations shall be in the following status:
- a.     The equipment hatch closed and held in place by a minimum of four bolts;
  - b.     One door in each air lock closed; or capable of being closed provided ABGTS is OPERABLE in accordance with TS 3.7.12; and
  - c.     Each penetration providing direct access from the containment atmosphere to the outside atmosphere either:
    1.     closed by a manual or automatic isolation valve, blind flange, or equivalent, or
    2.     capable of being closed by an OPERABLE Containment Vent Isolation System.
    - 3.

..... NOTE .....  
Penetration flow path(s) providing direct access from the containment atmosphere to the outside atmosphere may be unisolated under administrative controls provided ABGTS is OPERABLE in accordance with TS 3.7.12.  
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APPLICABILITY:     During movement of irradiated fuel assemblies within containment.

#### ACTIONS

CONDITION		REQUIRED ACTION	COMPLETION TIME
A.	One or more containment penetrations not in required status.	A.1    Suspend movement of irradiated fuel assemblies within containment.	Immediately



### 3.9 REFUELING OPERATIONS

#### 3.9.7 Refueling Cavity Water Level

LCO 3.9.7 Refueling cavity water level shall be maintained  $\geq 23$  ft above the top of reactor vessel flange.

APPLICABILITY: During movement of irradiated fuel assemblies within containment.

#### ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Refueling cavity water level not within limit.	A.1 Suspend movement of irradiated fuel assemblies within containment.	Immediately
	<u>AND</u>	
	A.2 Initiate action to restore refueling cavity water level to within limit.	Immediately

Reactor Building Purge Air Cleanup Units  
3.9.8

3.9 REFUELING OPERATIONS

3.9.8 Reactor Building Purge Air Cleanup Units

LCO 3.9.8 Two Reactor Building Purge Air Cleanup Units shall be OPERABLE.

APPLICABILITY: During movement of irradiated fuel assemblies within the containment.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One Reactor Building Purge Air Cleanup Unit inoperable.	A.1 Isolate the inoperable air cleanup unit.	Immediately
	<u>AND</u> A.2 Verify the OPERABLE air cleanup unit is in operation.	Immediately
B. Two Reactor Building Purge Air Cleanup Units inoperable.	B.1 Suspend movement of irradiated fuel assemblies within containment.	Immediately

BASES

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LCO  
(continued)

4. Safety Injection (SI)

Refer to LCO 3.3.2, Function 1, for all initiating Functions and requirements.

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APPLICABILITY

The Manual Initiation, Automatic Actuation Logic and Actuation Relays, Safety Injection, and Containment Radiation Functions are required OPERABLE in MODES 1, 2, 3, and 4, and during movement of irradiated fuel assemblies within containment. Under these conditions, the potential exists for an accident that could release significant fission product radioactivity into containment. Therefore, the Containment Vent Isolation Instrumentation must be OPERABLE in these MODES.

While in MODES 5 and 6 without fuel handling in progress, the Containment Vent Isolation Instrumentation need not be OPERABLE since the potential for radioactive releases is minimized and operator action is sufficient to ensure post accident offsite doses are maintained within the limits of Reference 1.

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ACTIONS

The most common cause of channel inoperability is outright failure or drift sufficient to exceed the tolerance allowed by unit specific calibration procedures. Typically, the drift is found to be small and results in a delay of actuation rather than a total loss of function. If the Trip Setpoint is less conservative than the tolerance specified by the calibration procedure, the channel must be declared inoperable immediately and the appropriate Condition entered.

A Note has been added to the ACTIONS to clarify the application of Completion Time rules. The Conditions of this Specification may be entered independently for each Function listed in Table 3.3.6-1. The Completion Time(s) of the inoperable channel(s)/train(s) of a Function will be tracked separately for each Function starting from the time the Condition was entered for that Function.

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BASES

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ACTIONS

B.1 (continued)

A Note is added stating that Condition B is only applicable in MODE 1, 2, 3, or 4.

C.1 and C.2

Condition C applies to all Containment Vent Isolation Functions and addresses the train orientation of the SSPS and the master and slave relays for these Functions. It also addresses the failure of multiple radiation monitoring channels, or the inability to restore a single failed channel to OPERABLE status in the time allowed for Required Action A.1. If a train is inoperable, multiple channels are inoperable, or the Required Action and associated Completion Time of Condition A are not met, operation may continue as long as the Required Action to place and maintain containment purge and exhaust isolation valves in their closed position is met or the applicable Conditions of LCO 3.9.4, "Containment Penetrations," are met for each valve made inoperable by failure of isolation instrumentation. The Completion Time for these Required Actions is Immediately.

A Note states that Condition C is applicable during movement of irradiated fuel assemblies within containment.

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SURVEILLANCE  
REQUIREMENTS

A Note has been added to the SR Table to clarify that Table 3.3.6-1 determines which SRs apply to which Containment Vent Isolation Functions.

SR 3.3.6.1

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.

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BASES

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APPLICABLE  
SAFETY ANALYSES  
(continued)

The radiation monitor actuation of the CREVS in MODES 5 and 6 and during movement of irradiated fuel assemblies, is the primary means to ensure control room habitability in the event of a fuel handling or waste gas decay tank rupture accident.

The CREVS actuation instrumentation satisfies Criterion 3 of the NRC Policy Statement.

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LCO

The LCO requirements ensure that instrumentation necessary to initiate the CREVS is OPERABLE.

1. Manual Initiation

The LCO requires two channels OPERABLE. The operator can initiate the CREVS at any time by using either of two switches in the control room. This action will cause actuation of all components in the same manner as any of the automatic actuation signals.

The LCO for Manual Initiation ensures the proper amount of redundancy is maintained in the manual actuation circuitry to ensure the operator has manual initiation capability.

Each channel consists of one hand switch and the interconnecting wiring to the actuation logic relays.

2. Control Room Radiation

The LCO specifies two required Control Room Air Intake Radiation Monitors to ensure that the radiation monitoring instrumentation necessary to initiate the CREVS remains OPERABLE. One radiation monitor is dedicated to each train of CREVS.

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BASES

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ACTIONS  
(continued)

B.1.1, B.1.2, and B.2

Condition B applies to the failure of two CREVS actuation trains, two radiation monitor channels, or two manual channels. The first Required Action is to place one CREVS train in the emergency radiation protection mode of operation immediately. This accomplishes the actuation instrumentation Function that may have been lost and places the unit in a conservative mode of operation. The applicable Conditions and Required Actions of LCO 3.7.10 must also be entered for the CREVS train made inoperable by the inoperable actuation instrumentation. This ensures appropriate limits are placed upon train inoperability as discussed in the Bases for LCO 3.7.10.

Alternatively, both trains may be placed in the emergency radiation protection mode. This ensures the CREVS function is performed even in the presence of a single failure.

C.1 and C.2

Condition C applies when the Required Action and associated Completion Time for Condition A or B have not been met and the plant is in MODE 1, 2, 3, or 4. The plant must be brought to a MODE in which the LCO requirements are not applicable. To achieve this status, the plant must be brought to MODE 3 within 6 hours and MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

D.1

Condition D applies when the Required Action and associated Completion Time for Condition A or B have not been met when irradiated fuel assemblies are being moved. Movement of irradiated fuel assemblies must be suspended immediately to reduce the risk of accidents that would require CREVS actuation.

(continued)

BASES

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LCO  
(continued)      The CREVS is considered OPERABLE when the individual components necessary to limit operator exposure are OPERABLE in both trains. A CREVS train is OPERABLE when the associated:

- a. Fan is OPERABLE;
- b. HEPA filters and charcoal adsorbers 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.

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APPLICABILITY      In MODES 1, 2, 3, 4, 5, and 6 and during movement of irradiated fuel assemblies, CREVS must be OPERABLE to control operator exposure during and following a DBA.

In MODE 5 or 6, the CREVS is required to cope with the release from the rupture of a waste gas decay tank.

During movement of irradiated fuel assemblies, the CREVS must be OPERABLE to cope with the release from a fuel handling accident.

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ACTIONS

A.1

When one CREVS train is inoperable, action must be taken to restore OPERABLE status within 7 days. In this Condition, the remaining OPERABLE CREVS train is adequate to perform the control room protection function. However, the overall reliability is reduced because a single failure in the OPERABLE CREVS train could result in loss of CREVS function. The 7 day Completion Time is based on the low probability of a DBA occurring during this time period, and ability of the remaining train to provide the required capability.

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(continued)

BASES

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ACTIONS  
(continued)

B.1 and B.2

In MODE 1, 2, 3, or 4, if the inoperable CREVS train cannot be restored to OPERABLE status within the required Completion Time, the plant must be placed in a MODE that minimizes accident risk. To achieve this status, the plant must be placed in at least MODE 3 within 6 hours, and in MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

C.1 and C.2

In MODE 5 or 6, or during movement of irradiated fuel assemblies, if the inoperable CREVS train cannot be restored to OPERABLE status within the required Completion Time, action must be taken to immediately place the OPERABLE CREVS train in the emergency mode. This action ensures that the remaining train is OPERABLE, that no failures preventing automatic actuation will occur, and that any active failure would be readily detected.

An alternative to Required Action C.1 is to immediately suspend activities that could result in a release of radioactivity that might require isolation of the control room. This places the unit in a condition that minimizes risk. This does not preclude the movement of fuel to a safe position.

D.1

If both CREVS trains are inoperable in MODE 1, 2, 3, or 4, due to actions taken as a result of a tornado, the CREVS may not be capable of performing the intended function because of loss of pressurizing air to the control room. At least one train must be restored to OPERABLE status within 8 hours or the unit must be placed in a MODE that minimizes accident risk. To achieve this status, the plant must be placed in at least MODE 3 within 6 hours, and in MODE 5 within 36 hours. The 8 hour restoration time is considered reasonable considering the low probability of occurrence of a design basis accident concurrent with a tornado warning.

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(continued)



BASES

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ACTIONS

D.1 (continued)

The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

E.1

In MODE 5 or 6, or during movement of irradiated fuel assemblies with two CREVS trains inoperable, action must be taken immediately to suspend activities that could result in a release of radioactivity that might enter the control room. This places the unit in a condition that minimizes accident risk. This does not preclude the movement of fuel to a safe position.

F.1

If both CREVS trains are inoperable in MODE 1, 2, 3, or 4, for reasons other than Condition D the CREVS may not be capable of performing the intended function and the plant is in a condition outside the accident analyses. Therefore, LCO 3.0.3 must be entered immediately.

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SURVEILLANCE  
REQUIREMENTS

SR 3.7.10.1

Standby systems should be checked periodically to ensure that they function properly. As the environment and normal operating conditions on this system are not too severe, testing each train once every month provides an adequate check of this system. The systems need only be operated for  $\geq 15$  minutes to demonstrate the function of the system. The 31 day Frequency is based on the reliability of the equipment and the two train redundancy availability.

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(continued)

BASES

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ACTIONS

B.1 and B.2 (continued)

Completion Time, the plant must be placed in a MODE that minimizes the risk. To achieve this status, the plant must be placed in at least MODE 3 within 6 hours, and in MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

C.1 and C.2

In MODE 5 or 6, or during movement of irradiated fuel, if the inoperable CREATCS train cannot be restored to OPERABLE status within the required Completion Time, the OPERABLE CREATCS train must be placed in operation immediately. This action ensures that the remaining train is OPERABLE, that no failures preventing automatic actuation will occur, and that active failures will be readily detected.

An alternative to Required Action C.1 is to immediately suspend activities that present a potential for releasing radioactivity that might require isolation of the control room. This places the unit in a condition that minimizes accident risk. This does not preclude the movement of fuel to a safe position.

D.1

In MODE 5 or 6, or during movement of irradiated fuel assemblies, with two CREATCS trains inoperable, action must be taken immediately to suspend activities that could result in a release of radioactivity that might require isolation of the control room. This places the unit in a condition that minimizes risk. This does not preclude the movement of fuel to a safe position.

E.1

If both CREATCS trains are inoperable in MODE 1, 2, 3, or 4 the CREATCS may not be capable of performing its intended function. Therefore, LCO 3.0.3 must be entered immediately.

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B 3.9 REFUELING OPERATIONS

B 3.9.4 Containment Penetrations

BASES

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BACKGROUND

During movement of irradiated fuel assemblies within containment, a release of fission product radioactivity within containment will be restricted from escaping to the environment when the LCO requirements are met. In MODES 1, 2, 3, and 4, this is accomplished by maintaining containment OPERABLE as described in LCO 3.6.1, "Containment." In MODE 6, the potential for containment pressurization as a result of an accident is not likely; therefore, requirements to isolate the containment from the outside atmosphere can be less stringent. The LCO requirements are referred to as "containment closure" rather than "containment OPERABILITY." Containment closure means that all potential escape paths are closed or capable of being closed. Since there is no potential for containment pressurization, the Appendix J leakage criteria and tests are not required.

The containment serves to contain fission product radioactivity that may be released from the reactor core following an accident, such that offsite radiation exposures are maintained well within the requirements of 10 CFR 100. Additionally, the containment provides radiation shielding from the fission products that may be present in the containment atmosphere following accident conditions.

The containment equipment hatch, which is part of the containment pressure boundary, provides a means for moving large equipment and components into and out of containment. During movement of irradiated fuel assemblies within containment, the equipment hatch must be held in place by at least four bolts. Good engineering practice dictates that the bolts required by this LCO be approximately equally spaced.

The containment air locks, which are also part of the containment pressure boundary, provide a means for personnel access during MODES 1, 2, 3, and 4 unit operation in accordance with LCO 3.6.2, "Containment Air Locks." Each air lock has a door at both ends. The doors are normally interlocked to prevent simultaneous opening when containment OPERABILITY is required. During periods of unit shutdown when containment closure is not required, the door interlock mechanism may be disabled, allowing both doors of an air lock to remain open for extended periods when frequent containment entry is necessary. During movement of irradiated fuel assemblies within containment, containment closure is required; therefore, the door interlock mechanism may remain disabled, but one air lock door must always remain capable of being closed.

The requirements for containment penetration closure ensure that a release of fission product radioactivity within containment will be restricted to within regulatory limits.

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BASES

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BACKGROUND  
(continued)

The Reactor Building Purge Ventilation System operates to supply outside air into the containment for ventilation and cooling or heating, to equalize internal and external pressures, and to reduce the concentration of noble gases within containment prior to and during personnel access. The supply and exhaust lines each contain two isolation valves. Because of their large size, the 24-inch containment lower compartment purge valves are physically restricted to  $\leq 50$  degrees open. The Reactor Building Purge and Ventilation System valves can be opened in MODES 5 and 6, but are closed automatically by the Engineered Safety Features Actuation System (ESFAS). In MODE 6, large air exchanges are necessary to conduct refueling operations. The normal 24-inch purge system is used for this purpose. The ventilation system must be either isolated or capable of being automatically isolated upon detection of high radiation levels within containment.

The other containment penetrations that provide direct access from containment atmosphere to outside atmosphere must be isolated on at least one side. Isolation may be achieved by an OPERABLE automatic isolation valve, or by a manual isolation valve, blind flange, or equivalent. Equivalent isolation methods must be NRC approved and may include use of a material that can provide a temporary, atmospheric pressure, ventilation barrier for the other containment penetrations during fuel movements (Ref. 1). Closure by other valves or blind flanges may be used if they are similar in capability to those provided for containment isolation. These may be constructed of standard materials and may be justified on the basis of either normal analysis methods or reasonable engineering judgment (Ref. 4).

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APPLICABLE  
SAFETY ANALYSES

During CORE ALTERATIONS or movement of irradiated fuel assemblies within containment, the most severe radiological consequences result from a fuel handling accident. The fuel handling accident is a postulated event that involves damage to irradiated fuel (Ref. 2). Fuel handling accidents, analyzed in Reference 3, include dropping a single irradiated fuel assembly and handling tool or a heavy object onto other irradiated fuel assemblies. The requirements of LCO 3.9.7, "Refueling Cavity Water Level," in conjunction with a minimum decay time of 100 hours prior to irradiated fuel movement with containment closure capability ensures that the release of fission product radioactivity, subsequent to a fuel handling accident, results in doses that are well within the guideline values specified in 10 CFR 100. Standard Review Plan, Section 15.7.4, Rev. 1 (Ref. 3), defines "well within" 10 CFR 100 to be 25% or less of the 10 CFR 100 values. The acceptance limits for offsite radiation exposure will be 25% of 10 CFR 100 values or the NRC staff approved licensing basis (e.g., a specified fraction of 10 CFR 100 limits).

Containment penetrations satisfy Criterion 3 of the NRC Policy Statement.

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BASES (continued)

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LCO This 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 Reactor Building Purge and Ventilation System penetrations, and the Containment personnel airlocks. For the OPERABLE Reactor Building Purge and Ventilation System penetrations, this LCO ensures that these penetrations are isolable by the Containment Ventilation Isolation System. The OPERABILITY requirements for this LCO ensure that the automatic purge and exhaust valve closure times specified in the FSAR can be achieved and, therefore, meet the assumptions used in the safety analysis to ensure that releases through the valves are terminated, such that radiological doses are within the acceptance limit.

The containment personnel airlock doors may be open during movement of irradiated fuel in the containment provided that one door is capable of being closed in the event of a fuel handling accident and provided that ABGTS is OPERABLE in accordance with TS 3.7.12. Should a fuel handling accident occur inside containment, one personnel airlock door will be closed following an evacuation of containment. The LCO is modified by a Note allowing penetration flow paths with direct access from the containment atmosphere to the outside atmosphere to be unisolated under administrative controls. Administrative controls ensure that 1) appropriate personnel are aware of the open status of the penetration flow path during movement of irradiated fuel assemblies within containment, 2) specified individuals are designated and readily available to isolate the flow path in the event of a fuel handling accident, and 3) the ABGTS is OPERABLE in accordance with TS 3.7.12. Operability of ABGTS is required to alleviate the consequences of a FHA inside containment resulting in leakage of airborne radioactive material past the open airlock or penetration flow paths prior to their closure.

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APPLICABILITY The containment penetration requirements are applicable during movement of irradiated fuel assemblies within containment because this is when there is a potential for the limiting fuel handling accident. In MODES 1, 2, 3, and 4, containment penetration requirements are addressed by LCO 3.6.1. In MODES 5 and 6, when movement of irradiated fuel assemblies within containment is not being conducted, the potential for a fuel handling accident does not exist. Therefore, under these conditions no requirements are placed on containment penetration status.

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BASES (continued)

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ACTIONS

A.1

If the containment equipment hatch, air locks, or any containment penetration that provides direct access from the containment atmosphere to the outside atmosphere is not in the required status, including the Containment Ventilation Isolation System not capable of automatic actuation when the purge and exhaust valves are open, the unit must be placed in a condition where the isolation function is not needed. This is accomplished by immediately suspending movement of irradiated fuel assemblies within containment. Performance of these actions shall not preclude completion of movement of a component to a safe position.

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SURVEILLANCE  
REQUIREMENTS

SR 3.9.4.1

This Surveillance demonstrates that each of the containment penetrations required to be in its closed position is in that position. The Surveillance on the open purge and exhaust valves will demonstrate that the valves are not blocked from closing. Also the Surveillance will demonstrate that each valve operator has motive power, which will ensure that each valve is capable of being closed by an OPERABLE automatic containment ventilation isolation signal.

The Surveillance is performed every 7 days during movement of irradiated fuel assemblies within containment. The Surveillance interval is selected to be commensurate with the normal duration of time to complete fuel handling operations. A surveillance before the start of refueling operations will provide two or three surveillance verifications during the applicable period for this LCO. As such, this Surveillance ensures that a postulated fuel handling accident that releases fission product radioactivity within the containment will not result in a release of significant fission product radioactivity to the environment in excess of those recommended by Standard Review Plan Section 15.7.4 (Reference 3).

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## B 3.9 REFUELING OPERATIONS

### B 3.9.7 Refueling Cavity Water Level

#### BASES

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**BACKGROUND**            The movement of irradiated fuel assemblies within containment requires a minimum water level of 23 ft above the top of the reactor vessel flange. During refueling, this maintains sufficient water level in the containment, refueling canal, fuel transfer canal, refueling cavity, and spent fuel pool. Sufficient water is necessary to retain iodine fission product activity in the water in the event of a fuel handling accident (Refs. 1 and 2). Sufficient iodine activity would be retained to limit offsite doses from the accident to < 25% of 10 CFR 100 limits, as provided by the guidance of Reference 3.

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**APPLICABLE SAFETY ANALYSES**    During movement of irradiated fuel assemblies, the water level in the refueling canal and the refueling cavity is an initial condition design parameter in the analysis of a fuel handling accident in containment, as postulated by Regulatory Guide 1.25 (Ref. 1). A minimum water level of 23 ft (Regulatory Position C.1.c of Ref. 1) allows a decontamination factor of 100 (Regulatory Position C.1.g of Ref. 1) to be used in the accident analysis for iodine. This relates to the assumption that 99% of the total iodine released from the pellet to cladding gap of all the dropped fuel assembly rods is retained by the refueling cavity water. The fuel pellet to cladding gap is assumed to contain 10% of the total fuel rod iodine inventory (Ref. 1).

The fuel handling accident analysis inside containment is described in Reference 2. With a minimum water level of 23 ft and a minimum decay time of 100 hours prior to fuel handling, the analysis and test programs demonstrate that the iodine release due to a postulated fuel handling accident is adequately captured by the water and offsite doses are maintained within allowable limits (Refs. 4 and 5).

Refueling cavity water level satisfies Criterion 2 of the NRC Policy Statement.

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(continued)

BASES (continued)

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LCO                      A minimum refueling cavity water level of 23 ft above thereactor vessel flange is required to ensure that the radiological consequences of a postulated fuel handling accident inside containment are within acceptable limits, as provided by the guidance of Reference 3.

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APPLICABILITY              LCO 3.9.7 is applicable when moving irradiated fuel assemblies within containment. The LCO minimizes the possibility of a fuel handling accident in containment that is beyond the assumptions of the safety analysis. If irradiated fuel assemblies are not present in containment, there can be no significant radioactivity release as a result of a postulated fuel handling accident. Requirements for fuel handling accidents in the spent fuel pool are covered by LCO 3.7.13, "Fuel Storage Pool Water Level."

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ACTIONS                      A.1

With a water level of < 23 ft above the top of the reactor vessel flange, all operations involving movement of irradiated fuel assemblies within the containment shall be suspended immediately to ensure that a fuel handling accident cannot occur. The suspension of fuel movement shall not preclude completion of movement of a component to a safe position.

A.2

In addition to immediately suspending movement of irradiated fuel, actions to restore refueling cavity water level must be initiated immediately.

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BASES (continued)

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SURVEILLANCE  
REQUIREMENTS

SR 3.9.7.1

Verification of a minimum water level of 23 ft above the top of the reactor vessel flange ensures that the design basis for the analysis of the postulated fuel handling accident during refueling operations is met. Water at the required level above the top of the reactor vessel flange limits the consequences of damaged fuel rods that are postulated to result from a fuel handling accident inside containment (Ref. 2).

The Frequency of 24 hours is based on engineering judgment and is considered adequate in view of the large volume of water and the normal procedural controls of valve positions, which make significant unplanned level changes unlikely.

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REFERENCES

1. Regulatory Guide 1.25, "Assumptions Used for Evaluating the Potential Radiological Consequences of a Fuel-Handling Accident in the Fuel Handling and Storage Facility for Boiling and Pressurized Water Reactors," U.S. Nuclear Regulatory Commission, March 23, 1972.
  2. Watts Bar FSAR, Section 15.4.5, "Fuel Handling Accident."
  3. NUREG-0800, "Standard Review Plan," Section 15.7.4, "Radiological Consequences of Fuel-Handling Accidents," U.S. Nuclear Regulatory Commission.
  4. Title 10, Code of Federal Regulations, Part 20.1201(a), (a)(1), and (2)(2), "Occupational Dose Limits for Adults."
  5. Malinowski, D. D., Bell, M. J., Duhn, E., and Locante, J., WCAP-7828, Radiological Consequences of a Fuel Handling Accident, December 1971.
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BASES (continued)

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APPLICABILITY	An initial assumption in the analysis of a fuel handling accident inside containment is that the accident occurs while irradiated fuel is being handled. Therefore, LCO 3.9.8 is applicable only at this time.
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ACTIONS A.1 and A.2

If one Reactor Building Purge Air Cleanup Unit is inoperable, that air cleanup unit must be isolated. This places the system in the required accident configuration, thus allowing refueling to continue after verifying the remaining air cleanup unit is aligned and OPERABLE.

The immediate Completion Time is consistent with the required times for actions to be performed without delay and in a controlled manner.

B.1

With two Reactor Building Purge Air Cleanup Units inoperable, movement of irradiated fuel assemblies within containment must be suspended. This precludes the possibility of a fuel handling accident in containment with both Reactor Building Purge Air Cleanup Units inoperable. Performance of this action shall not preclude moving a component to a safe position.

The immediate Completion Time is consistent with the required times for actions to be performed without delay and in a controlled manner.

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SURVEILLANCE  
REQUIREMENTS

SR 3.9.8.1

The Ventilation Filter Testing Program (VFTP) encompasses the Reactor Building Purge Air Cleanup Unit filter tests in accordance with Regulatory Guide 1.52 (Ref. 3). The VFTP includes testing the performance of the HEPA filter, charcoal adsorber efficiency, minimum flow rate, and the physical properties of the activated charcoal. Specific test Frequencies and additional information are discussed in detail in the VFTP.

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(continued)