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Millstone Power Station
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Dominion

APR 7 2003

Docket No. 50-336
B18851

RE: 10 CFR 50.90

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Millstone Power Station, Unit No. 2
Response to Request for Additional Information on
License Basis Document Change Request (LBDCR) 2-17-02,
Containment Systems (TAC No. MB6109)

In a letter dated August 14, 2002,[1] Dominion Nuclear Connecticut, Inc. (DNC) submitted a license amendment request in the form of changes to the Millstone Unit No. 2 Technical Specifications. The request proposed to clarify and change requirements related to Containment Integrity and Containment Isolation Valves in the Millstone Unit No. 2 Technical Specifications.

In a facsimile dated December 9, 2002,[2] the U.S. Nuclear Regulatory Commission (NRC) requested additional information related to this amendment request. On December 19, 2003, a teleconference was held to discuss this information with the NRC. As a result of this discussion, the NRC provided a new request for specific information in an NRC letter dated December 31, 2002.[3] DNC's response to these new questions and discussion of proposed changes is provided in Attachment 1. Attachment 2 contains a marked-up version of the affected original retyped pages of our August 14, 2002, submittal. Attachment 3 contains the retyped pages for the marked-up pages provided in Attachment 2. The additional information and proposed changes provided by this response are consistent with the discussion that was held in the December 19, 2002, teleconference with the NRC.

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(1) J. Alan Price to U.S. NRC, "Millstone Nuclear Power Station, Unit No. 2, License Basis Document Change Request (LBDCR) 2-17-02, Containment Systems," dated August 14, 2002.

(2) R. Ennis (NRC) Facsimile to R. Joshi, "Request for Additional Information (RAI) Regarding Proposed Amendment To Technical Specifications Containment Systems," (TAC No. MB6109), dated December 9, 2002.

(3) NRC letter to J. A. Price, "Request for Additional Information - Containment Systems, Millstone Power Station, Unit No. 2 (TAC No. MB6109)," dated December 31, 2002.

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The changes to the original license amendment request, and the additional information and discussions provided in the attachments, do not impact the conclusions stated in the Safety Summary or Significant Hazards Consideration included in the August 14, 2002, DNC submittal.

There are no regulatory commitments contained within this letter.

Should you have any questions regarding this submittal, please contact Mr. Ravi Joshi at (860) 440-2080.

Very truly yours,

DOMINION NUCLEAR CONNECTICUT, INC.

William R. Matthews
Senior Vice President - Nuclear Operations

Attachments (3)

Sworn to and subscribed before me

this 7 day of April, 2003

Diane M. Phillipo
Notary Public

DIANE M. PHILLIPO
NOTARY PUBLIC
MY COMMISSION EXPIRES 12/31/2005

My Commission expires _____

cc: H. J. Miller, Region I Administrator
R. B. Ennis, NRC Senior Project Manager, Millstone Unit No. 2
NRC Senior Resident Inspector

Director
Bureau of Air Management
Monitoring and Radiation Division
Department of Environmental Protection
79 Elm Street
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Docket No. 50-336
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Attachment 1

Millstone Power Station, Unit No. 2

Response to a Request for Additional Information on
License Basis Document Change Request (LBDCR) 2-17-02,
Containment Systems (TAC No. MB6109)

Response to a Request for Additional Information on
License Basis Document Change Request (LBDCR) 2-17-02,
Containment Systems

In a facsimile dated December 9, 2002,[1] the Nuclear Regulatory Commission (NRC) requested additional information (RAI) which relates to our license amendment request of August 14, 2002.[2] The amendment request proposed to clarify and change technical specification (TS) requirements relating to Containment Integrity and Containment Isolation Valves (CIVs). The changes were specific to TS Sections 1.8, "Definitions - Containment Integrity," 3.6.1.1, "Primary Containment - Containment Integrity," 3.6.1.6, "Containment Structural Integrity," 3.6.3.1, "Containment Isolation Valves," and 6.0, "Administrative Controls," as well as selected portions of related Bases to the TS. A teleconference with the NRC regarding this information was subsequently held on December 19, 2003. As a result of this discussion, the NRC provided a new request for specific information in an NRC letter dated December 31, 2002.[3] The DNC response to these new questions is provided in the balance of this attachment.

The NRC questions have been italicized and are followed by the DNC responses. The additional information in this attachment and the new marked-up pages provided by this response are consistent with the discussion that was held in teleconference with the NRC. Attachment 2 contains a marked-up version of the affected original retyped pages of Technical Specifications contained in our August 14, 2002, submittal. Attachment 3 contains the retyped pages for the marked-up pages in Attachment 2.

Question 1: *Proposed Change No. 6*

The licensee has proposed to add new SR 4.6.1.1.e that would read as follows:

Verify containment structural integrity in accordance with the Containment Tendon Surveillance Program.

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(1) R. Ennis (NRC) Facsimile to R. Joshi, "Request for Additional Information (RAI) Regarding Proposed Amendment To Technical Specifications Containment Systems," (TAC No. MB6109), dated December 9, 2002.

(2) J. Alan Price to U.S. NRC, "Millstone Nuclear Power Station, Unit No. 2, License Basis Document Change Request (LBDCR) 2-17-02, Containment Systems," dated August 14, 2002.

(3) NRC letter to J. A. Price, "Request for Additional Information - Containment Systems, Millstone Power Station, Unit No. 2 (TAC No. MB6109)," dated December 31, 2002.

It is suggested that this new SR be revised to read as follows so that the wording is compatible with the lead-in wording of SR 4.6.1.1 (i.e., "Primary CONTAINMENT INTEGRITY shall be demonstrated:"):

> *By verifying containment structural integrity in accordance with the Containment Tendon Surveillance Program.*

Response: DNC agrees with the suggestion and will revise the word "verify" to "verifying" and the proposed surveillance will read as follows:

> "*By* verify*ing* containment structural integrity in accordance with the Containment Tendon Surveillance Program."

Question 2: *Proposed Change No. 8*

LCO 3.6.3.1 currently reads as follows:

> *Each containment isolation valve shall be OPERABLE.**

The footnote "" that pertains to the word OPERABLE currently reads as follows:*

> *Locked or sealed closed valves may be opened on an intermittent basis under administrative controls.*

The licensee has proposed to change the format for footnote identifier "" with the identifier "(1)" and proposes to change the footnote wording to read as follows:*

> *Containment isolation valves may be opened on an intermittent basis under administrative controls.*

As discussed in the TS Bases for TS 3/4.6.3, the containment purge supply and exhaust isolation valves are required to be sealed closed during plant operation, since these valves have not been demonstrated to be capable of closing during a loss-of-coolant accident or steam line break accident. Therefore, the footnote should be modified to reflect that it does not apply to the purge valves. Note, modifying the footnote to exclude the purge valves would provide consistency with the STS, NUREG-1432, Revision 2, TS 3.6.3, Note 1, which reads:

> *Penetration flow paths [except for [42] inch purge valve penetration flow paths] may be unisolated intermittently under administrative controls.*

In addition, your justification for the proposed change states that there is no reduction in requirements, or changes to operation of CIVs, or to their administrative controls. However, the proposed change expands the

scope of which CIVs may be opened intermittently under administrative controls and thus new administrative controls would be required to open the CIVs that are not allowed to be open under the current TS requirements. Please justify this expansion in scope.

Response: DNC understands this question to be related to two separate observations regarding the proposed use of the following footnote in TS Section 3.6.3.1:

> *Containment isolation valves may be opened on an intermittent basis under administrative controls.*

In the first observation, the question suggests that the footnote be modified to preclude applicability to the purge valves. The second observation requests justification for the expansion in scope associated with use of the new administrative controls for CIVs. The response provided below addresses the two observations separately.

2.a Administrative controls and containment purge supply and exhaust valves:

Current TS Section 3.6.3.2, which is unaffected by the proposal, is specifically applicable to the containment purge supply and exhaust isolation valves. By this TS requirement, these valves must be sealed closed in MODES 1, 2, 3 and 4. As a result, DNC considers the text excerpted from the STS, NUREG-1432, Revision 2, that specifically states "[except for [42] inch purge valve penetration flow paths]," to be redundant to requirements already incorporated into TS. Therefore DNC has chosen not to modify the proposed footnote further as suggested. This response is consistent with discussion held with the NRC on December 19, 2002. DNC does, however, concur that administrative controls would not be applied to these valves, and has carefully considered that this proposal will not affect the requirements for these valves to remain sealed closed.

Both current and proposed TS Bases describe what constitutes appropriate considerations regarding the use of administrative controls. These considerations are consistent with guidance in Generic Letter 91-08,[4] "Removal of Component Lists from Technical Specifications." Before administrative controls can be

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[4] NRC letter to All Holders of Operating Licenses or Construction Permits for Nuclear Power Reactors, "Removal of Component Lists from Technical Specifications (Generic Letter 91-08)," dated May 6, 1991.

used for CIVs to be opened, assurance of actions necessary to prevent release of radioactivity outside the containment are required. Therefore, administrative controls must include appropriate considerations that containment integrity will be established, when required. This provides assurance that CIVs will be closed when needed and that allowing them to be opened will not adversely impact the consequences of the analyzed Final Safety Analysis Report (FSAR) Chapter 14 events. With respect to the above considerations, DNC concludes that administrative controls could not be used to open the containment purge supply and exhaust isolation valves. DNC's conclusion in regards to this question are also described by the current TS Bases of TS Section 3.6.3, cited below, which remains unaffected by this proposal:

> "The containment purge supply and exhaust isolation valves are required to be sealed closed during plant operation since these valves have not been demonstrated capable of closing during a LOCA or steam line break accident. Such a demonstration would require justification of the mechanical operability of the purge valves and consideration of the appropriateness of the electrical override circuits. Maintaining these valves closed during plant operations ensures that excessive quantities of radioactive materials will not be released via the containment purge system. The containment purge supply and exhaust isolation valves are sealed closed by removing power from the valves. This is accomplished by pulling the control power fuses for each of the valves. The associated fuse blocks are then locked. This is consistent with the guidance contained in NUREG-0737 Item II.E.4.2 and Standard Review Plan 6.2.4, 'Containment Isolation System,' Item II.f."

Although DNC has chosen not to modify the proposed footnote further to reflect the clarification regarding purge valves, this proposal remains safe and would not adversely impact design basis events or their consequences. Containment integrity will be maintained because the TS requirement for the purge supply and exhaust isolation valves continues to assure these valves remain sealed closed in MODES 1, 2, 3 and 4. The appropriate considerations for use of administrative controls are also documented and controlled in a manner to preclude their application to the purge supply and exhaust isolation valves.

2.b. Justification regarding expanded scope for new administrative controls:

DNC agrees that the proposed footnote effectively expands the scope of use for administrative controls beyond those CIVs which are simply locked or sealed closed. Therefore, the proposed change is less restrictive. However, DNC considers the proposed change to be consistent with the original purpose of the footnote and to be safe. The current footnote can be traced to NRC approved license amendment (No. 210), dated November 19, 1997,[5] which relocated the valve list included in Table 3.6-2, "Containment Isolation Valves." With regard to Table 3.6-2, the table also contained certain manual valves that during operation were allowed to be open as long as they were administratively controlled. Licensee control of these valves when opened in MODES 1 through 4 was required since closure would be necessary to isolate the containment during accident conditions. Consistent with guidance from Generic Letter (GL) 91-08, which was issued May 6, 1991, the current footnote remained in the TS when the amendment was issued. The purpose of the current footnote to TS Section 3.6.3.1 is to provide reasonable operational flexibility regarding containment penetrations by retaining provisions for the use of administrative controls. (See pages 3 and 4 of GL 91-08).

The proposed change is acceptable because the TS Section 3.6.3.1 operability requirements and limiting conditions for operation (LCO) continue to ensure that the structures, systems and components are maintained consistent with the safety analyses and licensing basis. The proposed footnote to TS Section 3.6.3.1 allows any CIV (not just locked or sealed closed valves) to be opened on an intermittent basis under administrative control. The administrative controls that are used (see the proposed TS Bases) provide the same level of protection and do not differentiate whether the flow paths include locked or sealed valves. Administrative controls are in procedures, and the appropriate considerations for administrative controls are stated in the proposed TS Bases. Therefore, administrative controls must include appropriate considerations that containment integrity will be established, when required. This provides assurance that these

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[5] NRC letter to Mr. Neil S. Carns, "Issuance of Amendment Relating to Relocation of the Containment Isolation Valves to the Technical Requirements Manual [Unit 2] (TAC No. M94623)," dated November 19, 1997.

valves will be closed and that allowing them to be opened will not adversely impact the consequences of the analyzed Final Safety Analysis Report Chapter 14 events.

Question 3: *Proposed Change No. 9*

The Action Statement for TS 3.6.3.1 currently reads as follows:

With one or more of the isolation valve(s) inoperable, either;

a. *Restore the inoperable valve(s) to OPERABLE status within 4 hours, or*

b. *Isolate the affected penetration(s) within 4 hours by use of a deactivated automatic valve(s) secured in the isolation position(s), or*

c. *Isolate the affected penetration(s) within 4 hours by use of a closed manual valve(s) or blind flange(s); or*

d. *Be in COLD SHUTDOWN within the next 36 hours.*

The licensee has proposed to change the designation for existing item "d" to "e," and add a new item "d" that would read as follows:

d. *Isolate the affected penetration that has only one containment isolation valve and a closed system within 72 hours by use of at least one closed and deactivated automatic valve, closed manual valve, or blind flange; or*

The licensee's submittal states that the proposed change adds a separate allowed outage time (AOT) to incorporate the changes approved in TSTF-30, which allows an AOT of 72 hours for those penetrations with a single containment isolation valve (CIV) and a closed system. One of the changes in TSTF-30 included a revision to the TS Bases to state that the closed system must meet the requirements of Standard Review Plan (SRP) 6.2.4. Your submittal states that use of the term "closed system" for containment penetrations in MP2 design and licensing basis is not in alignment with, or committed to the requirements of, a "closed system" in the Standard Review Plan 6.2.4. Please provide additional information regarding how the SRP 6.2.4 requirements for a closed system differ from the MP2 design and licensing basis.

In addition, your proposed change to the TS Bases (submittal Attachment 3, Insert "D") states that for the purposes of meeting this LCO, neither the CIV, nor any alternate valve on a closed system has a leakage limit associated with valve operability. As discussed in TS 1.6, a system subsystem, train, component, or device shall be operable or have operability when it is capable of performing its specified functions. What are the criteria for determining if a CIV on a closed system is operable if it exhibits a high leakage rate? If the acceptance criteria is that the valve meets SR 4.6.3.1.1 (which does not include any leakage criteria), how is the containment isolation function accomplished for a CIV on a closed system with a high leakage rate?

Response: DNC understands this question relates to two separate observations regarding use of the term "closed system" in the proposal. In the first observation, there is a question of how SRP 6.2.4 requirements for a closed system differ from the Millstone Unit No. 2 design and licensing basis. The second observation relates to how containment isolation function is accomplished for a CIV on a closed system with a high leakage rate. The response provided below addresses the two observations separately.

3.a. How does SRP 6.2.4 requirements for a closed system differ from the Millstone Unit No. 2 design and licensing basis?

The change approved in TSTF-30 that permits an extended and separate AOT of 72 hours for closed system isolation valves was based upon the definition of a closed system in compliance with the SRP 6.2.4 acceptance criteria. However, the SRP 6.2.4 acceptance criteria for a closed system were established subsequent to issuance of the Millstone Unit No. 2 operating license. Consequently, the design and licensing basis associated with Millstone Unit No. 2 closed systems are not described in terms of compliance to acceptance criteria of the SRP 6.2.4. Nonetheless, all of the closed systems that DNC considers applicable to the proposed extended AOT of 72 hours fully meet the SRP 6.2.4 acceptance criteria with exception of the Reactor Building Closed Cooling Water (RBCCW) system. As previously stated in the original amendment request, additional detail regarding closed system design will be added to FSAR Table 5.2-11, "Containment Structure Isolation Valve Information," and Containment Systems descriptions, to appropriately identify the closed system isolation valves, and their penetrations, that are applicable to the extended AOT.

The RBCCW system was originally designed as seismic Safety Class 3, and thus does not meet the acceptance criteria in SRP 6.2.4 for a Safety Class 2 (Quality Group B) design. However, this system is a low-energy, seismically-supported system. It is required to be OPERABLE in MODES 1 through 4 and is always in operation in MODES 1 through 4. Consequently, it is a system in which the difference between Safety Class 2 and 3 in terms of fabrication and surveillance requirements is sufficiently small to maintain a basis for confidence in it remaining intact during postulated accidents. Additionally, the inherent reliability and safety of the RBCCW system design has been previously accepted by the NRC as an adequate basis for exemption from Appendix J, Type C testing, as noted in a letter dated January 15, 1991.[6] Therefore, DNC concludes it is safe and appropriate to apply the proposed extended AOT of 72 hours to both CIVs in the RBCCW system and to closed systems that fully meet acceptance criteria of the SRP 6.2.4.

3.b. How is the containment isolation function accomplished for a CIV in a closed system with a high leak rate?

Acceptable leak rate criteria of CIVs on closed systems are neither defined nor credited in the Millstone Unit No. 2 Safety Analyses (i.e., the Final Safety Analysis Report Chapter 14 events and their consequences). There are, however, acceptance criteria related to the containment allowable leakage contained within the LCO for TS Section 3.6.1.2. These acceptance criteria would apply to CIVs in process lines of systems that can form a potential leak path for radiological doses to outside containment, and whose primary safety function is to isolate or remain isolated during an accident. CIVs in these penetrations are determined operable based on their leakage in relation to an allowable containment leak rate as prescribed by 10 CFR 50, Appendix J. For CIVs in closed systems which are required to remain open (and are normally open) during an accident and are exempt from 10 CFR 50, Appendix J, Type C testing, operational leakage through the CIVs would not be a factor in assessing operability against the Technical Specifications for Containment Systems, (i.e., TS Section 3.6.3.1).

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[6] NRC letter to Mr. Edward J. Mroczka, "Issuance of Exemption to 10 CFR Part 50, Appendix J, Sections III.A and III.C for the Millstone Nuclear Power Station, Unit No. 2 (TAC No. 75970)," dated January 15, 1991.

DNC notes that Surveillance Requirement 4.6.3.1.1 does not include leakage criteria. However, if an observation is made of equipment degradation (i.e., excessive leakage) in closed system isolation valves, even where applicable surveillance criteria have been satisfied, the operability of an affected CIV and its associated systems must still be evaluated. The FSAR Chapter 14 Accident Analyses do not postulate the rupture of a pipe in a closed fluid system inside containment as a single failure along with an initiating event. However, inventory diversions due to excessive leakage from a closed system containment isolation valve may impact the ability of the affected system to perform its FSAR Chapter 14 event mitigation function. These types of observations have the potential to impact operability of affected systems, structures or components. If no specific acceptable leak rate criteria is applicable to the CIV once operability of affected systems, structures, or components is assessed, a CIV in a closed system with excessive leakage could be concluded operable but degraded and subject to corrective action in accordance with 10 CFR 50 Appendix B.

Question 4: *Proposed Change No. 10*

The licensee has proposed to add a new footnote "(2)" pertaining to LCO 3.6.3.1 that would read as follows:

> *The provisions of this Specification are not applicable for main steam isolation valves. However provisions of Specification 3.7.1.5 are applicable for main steam isolation valves.*

The proposed change for MP2 is similar to TSTF-44, which proposed to add a note to the containment isolation valve LCO to state that the LCO is not applicable to main steam safety valves, main steam isolation valves, main feedwater isolation valves (MFIVs), MFIV bypass valves, and atmospheric dump valves. The NRC rejected TSTF-44 because the proposed change did not recognize that the separate LCOs related to these valves are associated with their dual safety functions. Please provide justification for the proposed change that addresses all safety functions of the main steam isolation valves.

Response: The purpose of the change was to provide a clarification that would eliminate the need to log entry into the Action Statements in both LCOs (namely TS Sections 3.6.3 and 3.7.1.5). The change was not intended to modify operability requirements of the LCO for Main Steam Line Isolation

Valves (MSIVs). Accordingly, DNC is revising the proposed footnote to read as follows:

> *"The provisions of this Specification in MODES 1, 2 and 3, are not applicable for main steam isolation valves. However provisions of Specification 3.7.1.5 are applicable for main steam isolation valves."*

In MODES 1, 2 and 3, the applicable requirements of the MSIVs are addressed in LCO 3.7.1.5, "Main Steam Line Isolation Valves." TS Section 3.7.1.5 for MSIVs is also more restrictive than the proposed change to TS Section 3.6.3.1 for CIVs that permit an allowed outage time of 72 hours for closed system isolation valves. Therefore, the safety functions of the MSIVs are addressed by the operability requirements and restoration actions of TS Section 3.7.1.5, which remains unaffected by the proposal. In MODE 4, MSIVs are required to be operable as closed system containment isolation valves per GDC 57, and the operability requirements and restoration actions of TS Section 3.6.3.1 apply.

The primary purpose of the MSIVs is to protect the reactor coolant system (RCS) from an overcooling event on excess steam demand. They are designed to automatically isolate the steam generators (SGs) in the event of a rupture of the main steam lines. The operability of the MSIVs ensures that no more than one SG will blowdown in the event of a steam line rupture. Therefore, at least one SG will be available as a heat sink to remove decay and sensible heat from the RCS. This minimizes the positive reactivity effects of the RCS cool down associated with a steam line rupture. It also limits the pressure rise within containment in the event that a steam line rupture occurs within containment. The MSIVs are also a closed system containment isolation valve per GDC 57.

Therefore, the proposed change that provides a clarification does not impact the safety functions credited in the Millstone Unit No. 2 Safety Analyses.

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Attachment 2

Millstone Power Station, Unit No. 2

License Basis Document Change Request 2-17-02
Containment Systems
Mark-up of Original Retyped Pages

3/4.6 CONTAINMENT SYSTEMS

3/4.6.1 PRIMARY CONTAINMENT

CONTAINMENT INTEGRITY

LIMITING CONDITION FOR OPERATION

3.6.1.1 Primary CONTAINMENT INTEGRITY shall be maintained.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

Without primary CONTAINMENT INTEGRITY, restore CONTAINMENT INTEGRITY within one hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the next 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.1.1 Primary CONTAINMENT INTEGRITY shall be demonstrated:

a. At least once per 31 days by verifying that all penetrations[1] not capable of being closed by OPERABLE containment automatic isolation valves[2] and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in their positions[3], except for valves that are open under administrative control as permitted by Specification 3.6.3.1.

b. At least once per 31 days by verifying the equipment hatch is closed and sealed.

c. By verifying the containment air lock is in compliance with the requirements of Specification 3.6.1.3.

d. After each closing of a penetration subject to type B testing (except the containment air lock), if opened following a Type A or B test, by leak rate testing in accordance with the Containment Leakage Rate Testing Program.

e. ~~Verify~~ By verifying containment structural integrity in accordance with the Containment Tendon Surveillance Program.

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(1) Except valves, blind flanges, and deactivated automatic valves which are located inside the containment and are locked, sealed, or otherwise secured in the closed position. These penetrations shall be verified closed prior to entering MODE 4 from MODE 5, if not performed within the previous 92 days.

(2) In MODE 4, the requirement for an OPERABLE containment automatic isolation valve system is satisfied by use of the containment isolation trip pushbuttons.

(3) Isolation devices in high radiation areas may be verified by use of administrative means.

3/4.6.3 CONTAINMENT ISOLATION VALVES

LIMITING CONDITION FOR OPERATION

3.6.3.1 Each containment isolation valve shall be OPERABLE.[1][2]

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With one or more of the isolation valve(s) inoperable, either:

a. Restore the inoperable valve(s) to OPERABLE status within 4 hours, or

b. Isolate the affected penetration(s) within 4 hours by use of a deactivated automatic valve(s) secured in the isolation position(s), or

c. Isolate the affected penetration(s) within 4 hours by use of a closed manual valve(s) or blind flange(s); or

d. Isolate the affected penetration that has only one containment isolation valve and a closed system within 72 hours by use of at least one closed and de-activated automatic valve, closed manual valve, or blind flange; or

e. Be in COLD SHUTDOWN within the next 36 hours.

SURVEILLANCE REQUIREMENTS

4.6.3.1.1 Each isolation valve testable during plant operation shall be demonstrated OPERABLE:

a. At least once per 92 days by:

1. Exercising each power operated valve through one complete cycle of full travel and measuring the isolation time, and

2. Exercising each manual valve, except those that are closed, through one complete cycle of full travel.

b. Immediately prior to returning the valve to service after maintenance, repair or replacement work is performed on the

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(1) Containment isolation valves may be opened on an intermittent basis under administrative controls.

(2) The provisions of this Specification in MODES 1, 2 and 3, are not applicable for main steam line isolation valves. However, provisions of Specification 3.7.1.5 are applicable for main steam line isolation valves.

THIS PAGE INCLUDED FOR INFORMATION
THERE ARE NO CHANGES ON THIS PAGE
August 21, 1998

PLANT SYSTEMS

MAIN STEAM LINE ISOLATION VALVES

LIMITING CONDITION FOR OPERATION

3.7.1.5 Each main steam line isolation valve shall be OPERABLE.

APPLICABILITY: MODES 1, 2 and 3.

ACTION:

MODE 1 - With one main steam line isolation valve inoperable, POWER OPERATION may continue provided the inoperable valve is either restored to OPERABLE status or closed within 4 hours; otherwise, be in MODE 2 within the next 6 hours.

MODES 2 and 3 - With one or more main steam line isolation valves inoperable, subsequent operation in MODES 2 or 3 may continue provided the inoperable valve(s) is(are) restored to OPERABLE status or the isolation valve(s) is(are) closed* within 1 hour and verified closed at least once per 7 days; otherwise, be in MODE 3 within the next 6 hours and MODE 4 within the following 6 hours.

SURVEILLANCE REQUIREMENTS

4.7.1.5 Each main steam line isolation valve shall be demonstrated OPERABLE by verifying full closure within 6 seconds on any closure actuation signal while in HOT STANDBY, with $T_{avg} \geq 515°F$ during each plant startup except that verification of full closure within 6 seconds need not be determined more often than once per 92 days. The provisions of Technical Specification 4.0.4 do not apply for entry into MODE 3.

*The main steam line isolation valves may be opened to perform Surveillance Requirement 4.7.1.5.

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Attachment 3

Millstone Power Station, Unit No. 2

License Basis Document Change Request 2-17-02
Containment Systems
Revised Set of Retyped Pages for the Marked-up Pages in Attachment 2

3/4.6 CONTAINMENT SYSTEMS

3/4.6.1 PRIMARY CONTAINMENT

CONTAINMENT INTEGRITY

LIMITING CONDITION FOR OPERATION

3.6.1.1 Primary CONTAINMENT INTEGRITY shall be maintained.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

Without primary CONTAINMENT INTEGRITY, restore CONTAINMENT INTEGRITY within one hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the next 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.1.1 Primary CONTAINMENT INTEGRITY shall be demonstrated:

a. At least once per 31 days by verifying that all penetrations[1] not capable of being closed by OPERABLE containment automatic isolation valves[2] and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in their positions[3], except for valves that are open under administrative control as permitted by Specification 3.6.3.1.

b. At least once per 31 days by verifying the equipment hatch is closed and sealed.

c. By verifying the containment air lock is in compliance with the requirements of Specification 3.6.1.3.

d. After each closing of a penetration subject to type B testing (except the containment air lock), if opened following a Type A or B test, by leak rate testing in accordance with the Containment Leakage Rate Testing Program.

e. By verifying containment structural integrity in accordance with the Containment Tendon Surveillance Program.

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(1) Except valves, blind flanges, and deactivated automatic valves which are located inside the containment and are locked, sealed, or otherwise secured in the closed position. These penetrations shall be verified closed prior to entering MODE 4 from MODE 5, if not performed within the previous 92 days.

(2) In MODE 4, the requirement for an OPERABLE containment automatic isolation valve system is satisfied by use of the containment isolation trip pushbuttons.

(3) Isolation devices in high radiation areas may be verified by use of administrative means.

3/4.6.3 CONTAINMENT ISOLATION VALVES

LIMITING CONDITION FOR OPERATION

3.6.3.1 Each containment isolation valve shall be OPERABLE.[1][2]

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With one or more of the isolation valve(s) inoperable, either:

a. Restore the inoperable valve(s) to OPERABLE status within 4 hours, or

b. Isolate the affected penetration(s) within 4 hours by use of a deactivated automatic valve(s) secured in the isolation position(s), or

c. Isolate the affected penetration(s) within 4 hours by use of a closed manual valve(s) or blind flange(s); or

d. Isolate the affected penetration that has only one containment isolation valve and a closed system within 72 hours by use of at least one closed and de-activated automatic valve, closed manual valve, or blind flange; or

e. Be in COLD SHUTDOWN within the next 36 hours.

SURVEILLANCE REQUIREMENTS

4.6.3.1.1 Each isolation valve testable during plant operation shall be demonstrated OPERABLE:

a. At least once per 92 days by:

1. Exercising each power operated valve through one complete cycle of full travel and measuring the isolation time, and

2. Exercising each manual valve, except those that are closed, through one complete cycle of full travel.

b. Immediately prior to returning the valve to service after maintenance, repair or replacement work is performed on the

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(1) Containment isolation valves may be opened on an intermittent basis under administrative controls.

(2) The provisions of this Specification in MODES 1, 2, and 3, are not applicable for main steam line isolation valves. However, provisions of Specification 3.7.1.5 are applicable for main steam line isolation valves.