

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	<p>A.2</p> <p>-----NOTES-----</p> <ol style="list-style-type: none"> 1. Isolation devices in high radiation areas may be verified by use of administrative means. 2. Isolation devices that are locked, sealed, or otherwise secured may be verified by administrative means. <p>-----</p> <p>Verify the affected penetration flow path is isolated.</p>	<p>Once per 31 days for isolation devices outside containment</p> <p><u>AND</u></p> <p>Prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days for isolation devices inside containment</p>

(continued)

ACTIONS (continued)

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(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>C. -----NOTE----- Only applicable to penetration flow paths with only one containment isolation valve and a closed system. -----</p> <p>One or more penetration flow paths with one containment isolation valve inoperable or the closed system breached.</p>	<p>C.1 Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, or blind flange.</p> <p><u>AND</u></p> <p>C.2 -----NOTES----- 1. Isolation devices in high radiation areas may be verified by use of administrative means. 2. Isolation devices that are locked, sealed, or otherwise secured may be verified by administrative means. ----- Verify the affected penetration flow path is isolated.</p>	<p>4 hours</p> <p>Once per 31 days</p>
<p>D. One or more penetration flow paths with one or more 48 inch containment purge valves not within purge valve leakage limits.</p>	<p>D.1 Restore purge valve leakage to within limits.</p>	<p>24 hours</p>
<p>E. Required Action and associated Completion Time not met.</p>	<p>E.1 Be in MODE 3. <u>AND</u> E.2 Be in MODE 5.</p>	<p>6 hours</p> <p>36 hours</p>

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.6.3.1 Verify each 48 inch purge valve is sealed closed except for one purge valve in a penetration flow path while in Condition D of the LCO.</p>	<p>31 days</p>
<p>SR 3.6.3.2 Verify each 6 inch post accident hydrogen purge valve is closed except when the 6 inch post accident hydrogen purge valves are open for pressure control, ALARA or air quality considerations for personnel entry, or for Surveillances that require the valves to be open.</p>	<p>31 days</p>
<p>SR 3.6.3.3 -----NOTE----- Valves and blind flanges in high radiation areas may be verified by use of administrative means. ----- Verify each containment isolation manual valve and blind flange that is located outside containment and is not locked, sealed, or otherwise secured and is required to be closed during accident conditions is closed, except for containment isolation valves that are open under administrative controls.</p>	<p>31 days</p>

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SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.6.3.4 -----NOTE----- Valves and blind flanges in high radiation areas may be verified by use of administrative means. -----</p> <p>Verify each containment isolation manual valve and blind flange that is located inside containment and is not locked, sealed, or otherwise secured and required to be closed during accident conditions is closed, except for containment isolation valves that are open under administrative controls.</p>	<p>Prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days</p>
<p>SR 3.6.3.5 Verify the isolation time of each power operated and each automatic containment isolation valve that is not locked, sealed, or otherwise secured in the isolation position, is within limits.</p>	<p>In accordance with the Inservice Testing Program</p>
<p>SR 3.6.3.6 -----NOTE----- Results shall be evaluated against acceptance criteria of SR 3.6.1.1 in accordance with the Containment Leakage Rate Testing Program. -----</p> <p>Perform leakage rate testing for each 48 inch containment purge valve.</p>	<p>Within 92 days after opening the valve</p> <p><u>AND</u></p> <p>24 months</p>

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A.1 and A.2 (continued)

verification is necessary to ensure that containment penetrations required to be isolated following an accident and no longer capable of being automatically isolated will be in the isolation position should an event occur. This Required Action does not require any testing or valve manipulation. Rather, it involves verification that those isolation devices capable of being mispositioned are in the correct position. The Completion Time of "once per 31 days for isolation devices outside containment" is appropriate considering the fact that the valves are operated under administrative controls and the probability of their misalignment is low. For the isolation devices inside containment, the time period specified as "prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days" is based on engineering judgment and is considered reasonable in view of the inaccessibility of the isolation devices and other administrative controls that will ensure that isolation device misalignment is an unlikely possibility.

Condition A has been modified by a Note indicating this Condition is only applicable to those penetration flow paths with two containment isolation valves. For penetration flow paths with only one containment isolation valve and a closed system, Condition C provides appropriate actions.

Required Action A.2 is modified by two Notes. Note 1 applies to isolation devices located in high radiation areas and allows the devices to be verified by use of administrative means. Allowing verification by administrative means is considered acceptable since access to these areas is typically restricted. Note 2 applies to isolation devices that are locked, sealed, or otherwise secured in position and allows these devices to be verified closed by use of administrative means. Allowing verification by administrative means is considered acceptable, since the function of locking, sealing or securing components is to ensure that these devices are not inadvertently repositioned. Therefore, the probability of misalignment of these devices, once they have been verified to be in the proper position, is small.

B.1 and B.2

With all containment isolation valves in one or more penetration flow paths inoperable (except for 48 inch purge valve leakage not within limit), the affected penetration flow path must be isolated within 1 hour. The method of isolation must include the use of at least one isolation

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B.1 and B.2 (continued)

barrier that cannot be adversely affected by a single active failure. Isolation barriers that meet this criterion are a closed and de-activated automatic valve, a closed manual valve, and a blind flange. The 1 hour Completion Time is consistent with the ACTIONS of LCO 3.6.1. In the event the affected penetration is isolated in accordance with Required Action B.1, the affected penetration must be verified to be isolated on a periodic basis per Required Action B.2. This periodic verification is necessary to assure leak tightness of containment and that penetrations requiring isolation following an accident are isolated. The Completion Time of once per 31 days for verifying each affected penetration flow path is isolated is appropriate considering the fact that the valves are operated under administrative controls and the probability of their misalignment is low.

Condition B is modified by a Note indicating this Condition is only applicable to penetration flow paths with two containment isolation valves or those with one containment isolation valve and no closed system. Condition A of this Specification addresses the condition of one containment isolation valve inoperable in a penetration flow path with two containment isolation valves.

Required Action B.2 is modified by two Notes. Note 1 applies to isolation devices located in high radiation areas and allows the devices to be verified by use of administrative means. Allowing verification by administrative means is considered acceptable since access to these areas is typically restricted. Note 2 applies to isolation devices that are locked, sealed, or otherwise secured in position and allows these devices to be verified closed by use of administrative means. Allowing verification by administrative means is considered acceptable, since the function of locking, sealing or securing components is to ensure that these devices are not inadvertently repositioned. Therefore, the probability of misalignment of these devices, once they have been verified to be in the proper position, is small.

C.1 and C.2

With one or more penetration flow paths with one containment isolation valve inoperable or the closed system breached, the inoperable valve must be restored to OPERABLE status or the affected penetration flow path must be isolated. The method of isolation must include the use of at least one

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C.1 and C.2 (continued)

isolation barrier that cannot be adversely affected by a single active failure. Isolation barriers that meet this criterion are a closed and de-activated automatic valve, a closed manual valve, and a blind flange. A check valve may not be used to isolate the affected penetration. Required Action C.1 must be completed within the 4 hour Completion Time. The specified time period is reasonable, considering the relative stability of the closed system (hence, reliability) to act as a penetration isolation boundary and the relative importance of supporting containment OPERABILITY during MODES 1, 2, 3, and 4. In the event the affected penetration is isolated in accordance with Required Action C.1, the affected penetration flow path must be verified to be isolated on a periodic basis. This periodic verification is necessary to assure leak tightness of containment and that containment penetrations requiring isolation following an accident are isolated. The Completion Time of once per 31 days for verifying that each affected penetration flow path is isolated is appropriate considering the fact that the valves are operated under administrative controls and the probability of their misalignment is low.

Condition C is modified by a Note indicating that this Condition is only applicable to those penetration flow paths with only one containment isolation valve and a closed system. This Note is necessary since this Condition is written to specifically address those penetration flow paths utilizing a closed system.

Required Action C.2 is modified by two Notes. Note 1 applies to isolation devices located in high radiation areas and allows these devices to be verified by use of administrative means. Allowing verification by administrative means is considered acceptable since access to these areas is typically restricted. Note 2 applies to isolation devices that are locked, sealed, or otherwise secured in position and allows these devices to be verified closed by use of administrative means. Allowing verification by administrative means is considered acceptable, since the function of locking, sealing or securing components is to ensure that these devices are not inadvertently repositioned. Therefore, the probability of misalignment of these devices, once verified to be in the proper position, is small.

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SR 3.6.3.1 (continued)

the source of electric power or by removing the air supply to the valve operator. In this application, the term "sealed" has no connotation of leak tightness. The Frequency is a result of an NRC initiative, Generic Issue B-24 (Ref. 6), related to containment purge valve use during unit operations. In the event purge valve leakage requires entry into Condition D, the Surveillance permits opening one purge valve in a penetration flow path to perform repairs.

SR 3.6.3.2

This SR ensures that the 6 inch post accident hydrogen purge valves are closed as required or, if open, open for an allowable reason. The SR is not required to be met when the post accident hydrogen purge valves are open for pressure control, ALARA or air quality considerations for personnel entry, or for Surveillances that require the valves to be open. The post accident hydrogen purge valves are capable of closing in the environment following a LOCA. Therefore, these valves are allowed to be open for limited periods of time. The 31 day Frequency for verifying valve position is consistent with other containment isolation valve requirements discussed in SR 3.6.3.3.

SR 3.6.3.3

This SR requires verification that each containment isolation manual valve and blind flange located outside containment and is not locked, sealed, or otherwise secured and required to be closed during accident conditions is closed. The SR helps to ensure that post accident leakage of radioactive fluids or gases outside the containment boundary is within design limits. This SR does not require any testing or valve manipulation. Rather, it involves verification that those valves outside containment and capable of being mispositioned are in the correct position. Since verification of valve position for valves outside containment is relatively easy, a 31 day Frequency, based on engineering judgment was chosen

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SR 3.6.3.3 (continued)

to provide added assurance of the correct positions. The SR specifies that valves open under administrative controls are not required to meet the SR during the time the valves are open.

A Note modifies this SR and applies to valves and blind flanges located in high radiation areas allowing these devices to be verified closed by use of administrative means. Allowing verification by administrative means is considered acceptable, since access to these areas is typically restricted during MODES 1, 2, 3, and 4 for ALARA reasons. Therefore, the probability of misalignment of these valves, once they have been verified to be in the proper position, is low.

SR 3.6.3.4

This SR requires verification that each containment isolation manual valve and blind flange that is located inside containment and is not locked, sealed, or otherwise secured and required to be closed during accident conditions is closed. The SR helps to ensure that post accident leakage of radioactive fluids or gases outside the containment boundary is within design limits. For valves inside containment, the Frequency of "prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days" is appropriate, since these valves and flanges are typically inaccessible during reactor operation, are operated under administrative controls and the probability of their misalignment is low. The SR specifies that valves open under administrative controls are not required to meet the SR during the time they are open.

The Note allows valves and blind flanges located in high radiation areas to be verified closed by use of administrative means. Allowing verification by administrative means is considered acceptable, since the access to these areas is typically restricted during MODES 1, 2, 3, and 4 for ALARA reasons. Therefore, the probability of misalignment of these valves, once they have been verified to be in their proper position, is small.

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