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ATTENTION: "REPLACE" directions do not affect the Table of Contents, Therefore no TOC will be issued with the updated material.

TSB1 - TECHNICAL SPECIFICATION BASES UNIT 1 MANUAL

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A001

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Manual Title: TECHNICAL SPECIFICATION BASES UNIT 1 MANUAL

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B 3.6 CONTAINMENT SYSTEMS

B 3.6.4.1 Secondary Containment

BASES

BACKGROUND The secondary containment structure completely encloses the primary containment structure such that a dual-containment design is utilized to limit the spread of radioactivity to the environment to within limits. The function of the secondary containment is to contain, dilute, and hold up fission products that may leak from primary containment into secondary containment following a Design Basis Accident (DBA). 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 prior to release to the environment and to isolate and contain 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 (Ref. 1).

The secondary containment is a structure that completely encloses the primary containment and reactor coolant pressure boundary components. 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).

The secondary containment boundary consists of the reactor building structure and associated removable walls and panels, hatches, doors, dampers, sealed penetrations and valves. The secondary containment is divided into Zone I, Zone II and Zone III, each of which must be OPERABLE depending on plant status and the alignment of the secondary containment boundary. Specifically, the Unit 1 secondary containment boundary can be modified to exclude Zone II. Similarly, the Unit 2 secondary containment boundary can be modified to exclude Zone I. Secondary containment may consist of only Zone III when in MODE 4 or 5 during CORE ALTERATIONS, or during handling of irradiated fuel within the Zone III secondary containment boundary.

(continued)

BASES

BACKGROUND (continued)

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 the safety related 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." When one or more zones are excluded from secondary containment, the specific requirements for support systems will also change (e.g., required secondary containment isolation valves).

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. 2) and a fuel handling accident inside secondary containment (Ref. 3). The secondary containment performs no active function in response to either of these limiting events; however, its leak tightness is required to ensure that the release of radioactive materials from the primary containment is restricted to those leakage paths and associated leakage rates assumed in the accident analysis and that fission products entrapped within the secondary containment structure will be treated by the SGT System prior to discharge to the environment.

Secondary containment satisfies Criterion 3 of the NRC Policy Statement (Ref. 4).

LCO

An OPERABLE secondary containment provides a control volume into which fission products that bypass or leak from primary containment, or are released from the reactor coolant pressure boundary components located in secondary containment, can be diluted and 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. The leak tightness of secondary containment must also ensure that the release of radioactive materials to the environment is restricted to those leakage paths and associated leakage rates assumed in the accident analysis. For example, secondary containment bypass leakage must be restricted to the leakage rate required by LCO 3.6.1.3. The secondary containment boundary required to be OPERABLE is dependent on the operating status of both units, as well as the configuration of walls, doors, hatches, SCIVs, and available flow paths to the SGT System.

(continued)

BASES (continued)

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.

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 containment during MODES 1, 2, and 3. This time period also ensures that the probability of an accident (requiring secondary containment OPERABILITY) occurring during periods where secondary containment is inoperable is minimal.

A temporary (one-time) Completion Time is connected to the Completion Time Requirements above (4 hours) with an "OR" connector. The Temporary Completion Time is 48 hours and applies to the replacement of the Reactor Building Recirculating Fan Damper Motors. The Temporary Completion Time of 48 hours may only be used once, and expires on December 31, 2005.

B.1 and B.2

If secondary containment cannot be restored to OPERABLE status within the required Completion Time, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours and to MODE 4 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.

(continued)

BASES

ACTIONS (continued)

C.1, C.2, and C.3

Movement of irradiated fuel assemblies in the secondary containment, CORE ALTERATIONS, and OPDRVs can be postulated to cause fission product release to the secondary containment. In such cases, the secondary containment is the only barrier to release of fission products to the environment. CORE ALTERATIONS and movement of irradiated fuel assemblies must be immediately suspended if the secondary containment is inoperable.

Suspension of these activities shall not preclude completing an action that involves moving a component to a safe position. Also, action must be immediately initiated to suspend OPDRVs to minimize the probability of a vessel draindown and subsequent potential for fission product release. Actions must continue until OPDRVs are suspended.

Required Action C.1 has been modified by a Note stating that LCO 3.0.3 is not applicable. If moving irradiated fuel assemblies while in MODE 4 or 5, LCO 3.0.3 would not specify any action. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, in either case, inability to suspend movement of irradiated fuel assemblies would not be a sufficient reason to require a reactor shutdown.

SURVEILLANCE REQUIREMENTS

SR 3.6.4.1.1

This SR ensures that the secondary containment boundary is sufficiently leak tight to preclude exfiltration under expected wind conditions. Expected wind conditions are defined as sustained wind speeds of less than or equal to 16 mph at the 60m meteorological tower or less than or equal to 11 mph at the 10m meteorological tower if the 60m tower wind speed is not available. Changes in indicated reactor building differential pressure observed during periods of short-term wind speed gusts above these sustained speeds do not by themselves impact secondary containment integrity. However, if secondary containment integrity is known to be compromised, the LCO must be entered regardless of wind speed.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.6.4.1.1 (continued)

The 24 hour Frequency of this SR was developed based on operating experience related to secondary containment vacuum variations during the applicable MODES and the low probability of a DBA occurring between surveillances.

Furthermore, the 24 hour Frequency is considered adequate in view of other indications available in the control room, including alarms, to alert the operator to an abnormal secondary containment vacuum condition.

SR 3.6.4.1.2 and SR 3.6.4.1.3

Verifying that secondary containment equipment hatches, removable walls and one access door in each access opening required to be closed are closed ensures that the infiltration of outside air of such a magnitude as to prevent maintaining the desired negative pressure does not occur.

Verifying that all such openings are closed also provides adequate assurance that exfiltration from the secondary containment will not occur. In this application, the term "sealed" has no connotation of leak tightness.

An access opening typically contains one inner and one outer door. Maintaining secondary containment OPERABILITY requires verifying one door in each access opening to secondary containment zones is closed. In some cases (e.g., railroad bay), secondary containment access openings are shared such that a secondary containment barrier may have multiple inner or multiple outer doors. The intent is to maintain the secondary containment barrier intact, which is achieved by maintaining the inner or outer portion of the barrier closed at all times. However, all secondary containment access doors are normally kept closed, except when the access opening is being used for entry and exit or when maintenance is being performed on an access opening.

When the railroad bay door (No. 101) is closed; all Zone I and III hatches, removable walls, dampers, and one door in each access opening connected to the railroad access bay are closed; or, only Zone I removable walls and/or doors are open to the railroad access shaft; or, only Zone III hatches and/or dampers are open to the railroad access shaft. When the railroad bay door (No. 101) is open; all Zone I and III hatches, removable walls, dampers, and one door in each access opening connected to the railroad access bay are closed. The truck bay hatch is closed and the truck bay door (No. 102) is closed unless Zone II is isolated from Zones I and III.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.6.4.1.2 and SR 3.6.4.1.3 (continued)

When an access opening between required secondary containment zones is being used for exit and entry, then at least one door (where two doors are provided) must remain closed. The access openings between secondary containment zones which are not provided with two doors are administratively controlled to maintain secondary containment integrity during exit and entry. This Surveillance is modified by a Note that allows access openings with a single door (i.e., no airlock) within the secondary containment boundary (i.e., between required secondary containment zones) to be opened for entry and exit. Opening of an access door for entry and exit allows sufficient administrative control by individual personnel making the entries and exits to assure the secondary containment function is not degraded. When one of the zones is not a zone required for secondary containment OPERABILITY, the Note allowance would not apply.

The 31 day Frequency for these SRs has been shown to be adequate, based on operating experience, and is considered adequate in view of the other indications of door and hatch status that are available to the operator.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.6.4.1.4 and SR 3.6.4.1.5

The SGT System exhausts the secondary containment atmosphere to the environment through appropriate treatment equipment. To ensure that all fission products are treated, SR 3.6.4.1.4 verifies that the SGT System will rapidly establish and maintain a pressure in the secondary containment that is less than the pressure external to the secondary containment boundary. This is confirmed by demonstrating that one SGT subsystem will draw down the secondary containment to ≥ 0.25 inches of vacuum water gauge in less than or equal to the maximum time allowed. This cannot be accomplished if the secondary containment boundary is not intact. SR 3.6.4.1.5 demonstrates that one SGT subsystem can maintain ≥ 0.25 inches of vacuum water gauge for at least 1 hour at less than or equal to the maximum flow rate permitted for the secondary containment configuration that is operable. The 1 hour test period allows secondary containment to be in thermal equilibrium at steady state conditions. As noted, both SR 3.6.4.1.4 and SR 3.6.4.1.5 acceptance limits are dependent upon the secondary containment configuration when testing is being performed. The acceptance criteria for the SRs based on secondary containment configuration is defined as follows:

SECONDARY CONTAINMENT TEST CONFIGURATION	MAXIMUM DRAWDOWN TIME(SEC) (SR 3.6.4.1.4 ACCEPTANCE CRITERIA)	MAXIMUM FLOW RATE (CFM) (SR 3.6.4.1.5 ACCEPTANCE CRITERIA)
Zones I, II and III.	≤ 125 Seconds (Zones I, II, and III)	≤ 4000 CFM (From Zones I, II, and III)
Zones I and III.	≤ 117 Seconds (Zones I and III)	≤ 2885 CFM (From Zones I and III)

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.6.4.1.4 and SR 3.6.4.1.5 (continued)

Only one of the above listed configurations needs to be tested to confirm secondary containment OPERABILITY.

A Note also modifies the Frequency for each SR. This Note identifies that each configuration is to be tested every 60 months. Testing each configuration every 60 months assures that the most limiting configuration is tested every 60 months. The 60 month Frequency is acceptable because operating experience has shown that these components usually pass the Surveillance and all active components are tested more frequently. Therefore, these tests are used to ensure secondary containment boundary integrity.

Since these SRs are secondary containment tests, they need not be performed with each SGT subsystem. The SGT subsystems are tested on a STAGGERED TEST BASIS, however, to ensure that in addition to the requirements of LCO 3.6.4.3, either SGT subsystem will perform SR 3.6.4.1.4 and SR 3.6.4.1.5. Operating experience has shown these components usually pass the Surveillance when performed at the 24 month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

REFERENCES

1. FSAR, Section 6.2.3.
2. FSAR, Section 15.6.
3. FSAR, Section 15.7.4.
4. Final Policy Statement on Technical Specifications Improvements, July 22, 1993 (58 FR 39132).