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### 3.6.4 Containment Purge and Vent Valves

3.6.4.1 During periods when Containment integrity is required, the Containment Purge Supply and Exhaust Isolation Valves (42") or the Pressure and Vacuum Relief Valves (6") may be opened only for safety related reasons including operational testing and surveillances.

3.6.4.2 When the RCS is greater than 200°F, the 42" and 6" valves may not be open simultaneously.

3.6.4.3 The 6" and 42" valves will be tested in accordance with the frequency and operability requirements specified in the Robinson plant IST program except that the 42" valves will be tested prior to use if not tested within the previous quarter. Otherwise the 42" valves will not be cycled quarterly only for testing purposes.

#### Basis

The Reactor Coolant System conditions of cold shutdown assure that no steam will be found and hence there would be no pressure buildup in the containment if the Reactor Coolant System ruptures.

The shutdown margins are selected based on the type of activities that are being carried out. The 10%  $\Delta k/k$  shutdown margin during refueling precludes criticality, even though fuel is being moved. When the reactor head is not to be removed, the specified cold shutdown margin of 1%  $\Delta k/k$  precludes criticality.

Regarding internal pressure limitations, the containment design pressure of 42 psig would not be exceeded if the internal pressure before a major loss-of-coolant accident were as much as 2 psig.<sup>(1)</sup> The containment is designed to withstand an internal vacuum of 2.0 psig.<sup>(2)</sup>

The Containment Purge Supply and Exhaust Isolation Valves may be opened during plant operation when needed for safety related considerations (equipment or personnel) to support plant operations and maintenance activities within the containment vessel. Examples of this need may include the reducing of airborne activity to increase stay-time or eliminate the need for respiratory protective equipment, or reduce ambient temperature during hot months to increase effectiveness of workers and to minimize occupational effects of necessary, non-routine activities in the containment. Although the valves are fully qualified to close under design basis accident conditions, it is intended that the time the valves remain open will be limited.

The Containment Purge Valves must be operable and must close within the time limit specified in the IST program in order to limit post LOCA thyroid dose and to limit the increase in peak clad temperature due to reduction in containment internal pressure.

The Inboard Purge Supply and Exhaust Isolation Valves are installed so the seal replacement can be performed from outside the Containment. This orientation requires that the inboard valves be restricted from exceeding 70° open. This restriction is an anti-rotation measure to assure proper valve closure under dynamic conditions.

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#### References

- (1) FSAR Section 6.2.1
- (2) FSAR Section 3.8.1.3