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TSB1 - TECHNICAL SPECIFICATION BASES UNIT 1 MANUAL

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Manual Title: TECHNICAL SPECIFICATION BASES UNIT 1 MANUAL

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B 3.6 CONTAINMENT SYSTEMS

B 3.6.4.3 Standby Gas Treatment (SGT) System

BASES

BACKGROUND The SGT System is required by 10 CFR 50, Appendix A, GDC 41, "Containment Atmosphere Cleanup" (Ref. 1). The safety function of the SGT System is to ensure that radioactive materials that leak from the primary containment into the secondary containment following a Design Basis Accident (DBA) are filtered and adsorbed prior to exhausting to the environment.

The SGT System consists of two redundant subsystems, each with its own set of dampers, filter train, and a reactor building recirculation fan and associated dampers and controls.

Each filter train consists of (components listed in order of the direction of the air flow):

a. A demister;

b. An electric heater;

c. A prefilter;

d. A high efficiency particulate air (HEPA) filter;

e. A charcoal adsorber;

f. A second HEPA filter; and

g. A centrifugal fan.

The sizing of the SGT System equipment and components is based on handling an incoming air mixture at a maximum of 125°F. The internal pressure of the secondary containment is maintained at a negative pressure of 0.25 inches water gauge when the system is in operation. Maintenance of a negative pressure precludes direct outleakage.

The demister is provided to remove entrained water in the air, while the electric heater reduces the relative humidity of the airstream to less than 70% (Ref. 2). The prefilter removes large particulate matter, while the HEPA filter

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BASES

BACKGROUND (continued)

removes fine particulate matter and protects the charcoal from fouling. The charcoal adsorber removes gaseous elemental iodine and organic iodides, and the final HEPA filter collects any carbon fines exhausted from the charcoal adsorber.

The SGT System automatically starts and operates in response to actuation signals indicative of conditions or an accident that could require operation of the system. Following initiation in each division, the associated filter train fan starts. Upon verification that both subsystems are operating, the redundant subsystem may be shut down.

The SGT System also contains a cooling function to remove heat generated by fission product decay on the HEPA filters and charcoal adsorbers during shutdown of an SGT subsystem. The cooling function consists of two separate and independent filter cooling modes per SGT subsystem. The two cooling modes are:

1) Outside air damper and the filter cooling bypass damper open, allowing outside air to flow through the shutdown SGT subsystem's filter train and exit via the opposite SGT subsytem's exhaust fan.

2) Outside air damper opens and the SGT exhaust fan of the shutdown SGT subsystem starts. This configurations draws outside air through the shutdown SGT subsystem's filter train and exits via the associated SGT subsystem's exhaust fan.

APPLICABLE SAFETY ANALYSES

The design basis for the SGT System is to mitigate the consequences of a loss of coolant accident and fuel handling accidents (Ref. 2). For all events analyzed, the SGT System is shown to be automatically initiated to reduce, via filtration and adsorption, the radioactive material released to the environment.

The SGT System satisfies Criterion 3 of the NRC Policy Statement (Ref. 3).

LCO

Following a DBA, a minimum of one SGT subsystem is required to maintain the secondary containment at a negative pressure with respect to the environment and to process gaseous releases. Meeting the LCO requirements for two OPERABLE subsystems ensures operation of at least

(continued)

BASES

LCO (continued)

one SGT subsystem in the event of a single active failure. A SGT subsystem is considered OPERABLE when it has an OPERABLE set of dampers, filter train, one reactor building recirculation fan and associated dampers, and associated controls, including instrumentation. (The reactor building recirculation fans and associated dampers are not dedicated to either SGT subsystem. As a result, when any one reactor building recirculation division is not OPERABLE, one arbitrarily determined SGT subsystem is not operable. This interpretation only applies if both divisions of Secondary Containment Isolation logic are operable). This includes the components required for at least one of the two SGTS filter cooling modes.

APPLICABILITY

In MODES 1, 2, and 3, a DBA could lead to a fission product release to primary containment that leaks to secondary containment. Therefore, SGT System OPERABILITY is required during these MODES.

In MODES 4 and 5, the probability and consequences of these events are reduced due to the pressure and temperature limitations in these MODES. Therefore, maintaining the SGT System in OPERABLE status is not required in MODE 4 or 5, except for other situations under 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

With one SGT subsystem inoperable, the inoperable subsystem must be restored to OPERABLE status in 7 days. In this Condition, the remaining OPERABLE SGT subsystem is adequate to perform the required radioactivity release control function. However, the overall system reliability is reduced because a single failure in the OPERABLE subsystem could result in the radioactivity release control function not being adequately performed. The 7 day Completion Time is based on consideration of such factors as the availability of the OPERABLE redundant SGT System and the low probability of a DBA occurring during this period.

(continued)

BASES

ACTIONS (continued)

B.1 and B.2

If the SGT subsystem cannot be restored to OPERABLE status within the required Completion Time in MODE 1, 2, or 3, 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.

C.1, C.2.1, C.2.2, and C.2.3

During movement of irradiated fuel assemblies, in the secondary containment, during CORE ALTERATIONS, or during OPDRVs, when Required Action A.1 cannot be completed within the required Completion Time, the OPERABLE SGT filter train should immediately be placed in operation. This action ensures that the remaining filter train is OPERABLE, that no failures that could prevent automatic actuation have occurred, and that any other failure would be readily detected.

An alternative to Required Action C.1 is to immediately suspend activities that represent a potential for releasing radioactive material to the secondary containment, thus placing the plant in a condition that minimizes risk. If applicable, CORE ALTERATIONS and movement of irradiated fuel assemblies must immediately be suspended. Suspension of these activities must not preclude completion of movement of a component to a safe position. Also, if applicable, actions must immediately be initiated to suspend OPDRVs in order to minimize the probability of a vessel draindown and subsequent potential for fission product release. Actions must continue until OPDRVs are suspended.

The Required Actions of Condition C have 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.

(continued)

BASES

ACTIONS (continued)

D.1

If both SGT subsystems are inoperable in MODE 1, 2, or 3, the SGT system may not be capable of supporting the required radioactivity release control function. The 4 hour Completion Time provides a period of time to correct the problem that is commensurate with the importance of maintaining the SGT System contribution to secondary containment during MODES 1, 2, and 3. This time period also ensures that the probability of an accident (requiring SGT OPERABILITY) occurring during periods where SGT 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.

E.1 and E.2

If at least one SGT subsystem 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.

F.1, F.2, and F.3

When two SGT subsystems are inoperable, if applicable, CORE ALTERATIONS and movement of irradiated fuel assemblies in secondary containment must immediately be suspended. Suspension of these activities shall not preclude completion of movement of a component to a safe position. Also, if applicable, actions must immediately be initiated to suspend OPDRVs in order to minimize the probability of a vessel draindown and subsequent potential for fission product release. Actions must continue until OPDRVs are suspended.

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BASES

ACTIONS

F.1, F.2, and F.3 (continued)

Required Action F.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 3.6.4.3.1

Operating each SGT filter train for ≥ 15 continuous minutes with heaters on ensures that both filter trains are OPERABLE and that all associated controls are functioning properly. It also ensures that blockage, fan or motor failure, or excessive vibration can be detected for corrective action. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.6.4.3.2

This SR verifies that the required SGT filter testing is performed in accordance with the Ventilation Filter Testing Program (VFTP). The VFTP includes testing HEPA filter performance, charcoal adsorber efficiency, minimum system flow rate, and the physical properties of the activated charcoal (general use and following specific operations). Specific test frequencies and additional information are discussed in detail in the VFTP.

SR 3.6.4.3.3

This SR verifies that each SGT subsystem starts on receipt of an actual or simulated initiation signal. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.6.4.3.4

This SR verifies that both cooling modes for each SGT subsystem are available. Although both cooling modes are tested, only one cooling mode for each SGT subsystem is required for an SGT subsystem to be considered OPERABLE. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

REFERENCES

1. 10 CFR 50, Appendix A, GDC 41.
2. FSAR, Section 6.5.1
3. Final Policy Statement on Technical Specifications Improvements, July 22, 1993 (58 FR 39132).
4. Regulatory Guide 1.52, Rev. 1.

3.7 PLANT SYSTEMS

B 3.7.3 Control Room Emergency Outside Air Supply (CREOAS) System

BASES

BACKGROUND The CREOAS System provides a protected environment from which occupants can control the unit following an uncontrolled release of radioactivity, hazardous chemicals, or smoke. This radiologically controlled environment is termed the Control Room Envelope (CRE) and is comprised of Control Structure floor elevations 697'-0" through 783'-0" including the stairwells as described in FSAR Section 6.4 (Ref. 5).

The safety related function of the CREOAS System includes two independent and redundant high efficiency air filtration subsystems for emergency treatment of outside supply air and a CRE boundary that limits the inleakage of unfiltered air. Each CREOAS subsystem consists of an electric heater, a prefilter, an upstream high efficiency particulate air (HEPA) filter, an activated charcoal adsorber section, a downstream HEPA filter, a CREOAS fan, a control structure heating and ventilation fan, a control room floor cooling fan, a computer room floor cooling fan, and the associated ductwork, valves or dampers, doors, barriers, and instrumentation. Prefilters and HEPA filters remove particulate matter, which may be radioactive. The charcoal adsorbers provide a holdup period for gaseous iodine, allowing time for decay. With the exception of the CREOAS fan, all other CREOAS subsystem fans operate continuously to maintain the affected compartments environment. These other ventilation fans operate independently of the CREOAS fans and are required to operate to ensure a positive pressure in the control structure is maintained utilizing filtered outside air supplied by the CREOAS fans.

The CRE is the area within the confines of the CRE boundary that contains the spaces that control room occupants inhabit to control the unit during normal and accident conditions. This area encompasses the control room, and may encompass other non-critical areas to which frequent personnel access or continuous occupancy is not necessary in the event of an accident. The CRE is protected during normal operation, natural events, and

(continued)

BASES

BACKGROUND (continued)

accident conditions. The CRE boundary is the combination of walls, floor, roof, ducting, doors, penetrations and equipment that physically form the CRE. The OPERABILITY of the CRE boundary must be maintained to ensure that the inleakage of unfiltered air into the CRE will not exceed the inleakage assumed in the licensing basis analysis of design basis accident (DBA) consequences to CRE occupants. The CRE and its boundary are defined in the Control Room Envelope Habitability Program.

Upon receipt of the initiation signal(s) (indicative of conditions that could result in radiation exposure to CRE occupants), the CREOAS System automatically switches to the pressurization/filtration mode of operation to minimize infiltration of contaminated air into the CRE. A system of dampers aligns the outside air intake to the CREOAS fan suction and filter train. Outside air is taken in at the normal ventilation intake and passed through one of the charcoal adsorber filter subsystems. The filtered air leaving the CREOAS filtration train is routed to the inlet of the other ventilation fans for distribution.

One of the CREOAS System design requirements is to maintain a habitable environment in the CRE for a 30 day continuous occupancy after a DBA without exceeding 5 rem whole body dose or its equivalent to any part of the body. A single CREOAS subsystem operating at a flow rate of ≤ 5810 cfm with an intact CRE will pressurize the CRE (which includes the control room) to greater than or equal to 0.125 inches water gauge relative to external areas adjacent to the CRE boundary to minimize infiltration of air from all surrounding areas adjacent to the CRE boundary. CREOAS System operation in maintaining CRE habitability is discussed in the FSAR, Chapters 6 and 9, (Refs. 1 and 2, respectively).

APPLICABLE SAFETY ANALYSES

The ability of the CREOAS System to maintain the habitability of the CRE is an explicit assumption for the safety analyses presented in the FSAR, Chapters 6 and 15 (Refs. 1 and 3,

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

respectively). The pressurization/filtration mode of the CREOAS System is assumed to operate following a DBA as discussed in the FSAR, Section 6.4.1 (Ref. 4). The radiological doses to the CRE occupants as a result of the various DBAs are summarized in Reference 3. No single active failure will cause the loss of outside or recirculated air from the CRE.

The CREOAS System provides protection from smoke and hazardous chemicals to the CRE occupants. The analysis of hazardous chemical releases demonstrates that the toxicity limits are not exceeded in the CRE following a hazardous chemical release (Ref. 5). The evaluation of a smoke challenge demonstrates that it will not result in the inability of the CRE occupants to control the reactor either from the control room or from the remote shutdown panels (Ref. 6).

The CREOAS System satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii).

LCO

Two redundant subsystems of the CREOAS System are required to be OPERABLE to ensure that at least one is available, if a single active failure disables the other subsystem. Total CREOAS System failure, such as from a loss of both ventilation subsystems or from an inoperable CRE boundary, could result in exceeding a dose of 5 rem whole body or equivalent to the CRE occupants in the event of a DBA.

Each CREOAS subsystem is considered OPERABLE when the individual components necessary to limit CRE occupant exposure are OPERABLE. Both subsystems are considered OPERABLE when:

a. Both filter trains each consisting of a CREOAS fan heater, a HEPA filter, and charcoal adsorber which is not excessively restricting flow is OPERABLE; and

b. Both Control Structure Heating and Ventilation fans, Computer Room Floor Cooling fans, and Control Room Floor Cooling fans are OPERABLE; and

(continued)

BASES

LCO (continued)

c. Ductwork, valves, and dampers are OPERABLE, and air circulation can be maintained.

d. Neither Smoke Removal Fan (0V104A/B) is in operation.

One subsystem is considered OPERABLE when:

a. One filter train consisting of a CREOAS fan, heater, a HEPA filter, and charcoal adsorber which is not excessively restricting flow is OPERABLE; and

b. The 'A' Control Structure Heating and Ventilation fan (0V103A) and the 'A' Computer Room Floor Cooling fan (0V115A) and the 'A' Control Room Floor Cooling fan (0V117A) are OPERABLE

OR

The 'B' Control Structure Heating and Ventilaiton fan (0V103B) and the 'B' Computer Room Floor Cooling fan (0V115B) and the 'B' Control Room Floor Cooling fan (0V117B) are OPERABLE

(These fans are not dedicated to either CREOAS subsystem. As a result when any one set of fans is not OPERABLE, one arbitrarily determined CREOAS subsystem is not OPERABLE): and

c. Ductwork, valves, and dampers are OPERABLE, and air circulation can be maintained.

d. Neither Smoke Removal Fan (0V104A/B) is in operation.

In order for the CREOAS subsystems to be considered OPERABLE, the CRE boundary must be maintained such that the CRE occupant dose from a large radioactive release does not exceed the calculated dose in the licensing basis consequence analyses for DBAs, and that CRE occupants are protected from hazardous chemicals and smoke. Note the CRE can not be maintained with a smoke removal fan (0V104A or 0V104B) in operation.

(continued)

BASES

LCO (continued)

The LCO is modified by a Note allowing the CRE boundary to be opened intermittently under administrative controls. This Note only applies to openings in the CRE boundary that can be rapidly restored to the design condition, such as doors, hatches, floor plugs, and access panels. For entry and exit through doors the administrative control of the opening is performed by the person(s) entering or exiting the area. For other openings, these controls should be proceduralized and consist of stationing a dedicated individual at the opening who is in continuous communication with the operators in the CRE. This individual will have a method to rapidly close the opening and to restore the CRE boundary to a condition equivalent to the design condition when a need for CRE isolation is indicated.

APPLICABILITY

In MODES 1, 2, and 3, the CREOAS System must be OPERABLE to ensure that the CRE will remain habitable during and following a DBA, since the DBA could lead to a fission product release.

In MODES 4 and 5, the probability and consequences of a DBA are reduced because of the pressure and temperature limitations in these MODES. Therefore, maintaining the CREOAS System OPERABLE is not required in MODE 4 or 5, except for the following situations under which significant radioactive releases can be postulated:

a. During operations with a potential for draining the reactor vessel (OPDRVs);

b. During CORE ALTERATIONS; and

c. During movement of irradiated fuel assemblies in the secondary containment.

(continued)

BASES

ACTIONS

A.1

With one CREOAS subsystem inoperable, for reasons other than an inoperable CRE boundary, the inoperable CREOAS subsystem must be restored to OPERABLE status within 7 days. With the unit in this condition, the remaining OPERABLE CREOAS subsystem is adequate to perform the CRE occupant protection function. However, the overall reliability is reduced because a failure in the OPERABLE subsystem could result in loss of the CREOAS System function. The 7 day Completion Time is based on the low probability of a DBA occurring during this time period, and that the remaining subsystem can provide the required capabilities.

B.1, B.2, and B.3

If the unfiltered inleakage of potentially contaminated air past the CRE boundary and into the CRE can result in CRE occupant radiological dose greater than the calculated dose of the licensing basis analyses of DBA consequences (allowed to be up to 5 rem whole body or its equivalent to any part of the body), or inadequate protection of CRE occupants from hazardous chemicals or smoke, the CRE boundary is inoperable. Actions must be taken to restore an OPERABLE CRE boundary within 90 days.

During the period that the CRE boundary is considered inoperable, action must be initiated to implement mitigating actions to lessen the effect on CRE occupants from the potential hazards of a radiological or chemical event or a challenge from smoke. Actions must be taken within 24 hours to verify that in the event of a DBA, the mitigating actions will ensure that CRE occupant radiological exposures will not exceed the calculated dose of the licensing basis analyses of DBA consequences, and that CRE occupants are protected from hazardous chemicals and smoke. These mitigating actions (i.e., actions that are taken to offset the consequences of the inoperable CRE boundary) should be preplanned for implementation upon entry into the condition, regardless of whether entry is intentional or unintentional.

(continued)

BASES

ACTIONS (continued)

B.1, B.2, and B.3 (continued)

The 24 hour Completion Time is reasonable based on the low probability of a DBA occurring during this time period, and the use of mitigating actions. The 90 day Completion Time is reasonable based on the determination that the mitigating actions will ensure protection of CRE occupants within analyzed limits while limiting the probability that CRE occupants will have to implement protective measures that may adversely affect their ability to control the reactor and maintain it in a safe shutdown condition in the event of a DBA. In addition, the 90 day Completion Time is a reasonable time to diagnose, plan and possibly repair, and test most problems with the CRE boundary.

C.1 and C.2

In MODE 1, 2, or 3, if the inoperable CREOAS subsystem or the CRE boundary cannot be restored to OPERABLE status within the required Completion Time, the unit must be placed in a MODE that minimizes accident risk. To achieve this status, the unit must be placed in at least MODE 3 within 12 hours and in MODE 4 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

(continued)

BASES

ACTIONS (continued)

D.1, D.2.1, D.2.2, and D.2.3

The Required Actions of Condition D are modified by a Note indicating that LCO 3.0.3 does not apply. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, inability to suspend movement of irradiated fuel assemblies is not sufficient reason to require either an entry into LCO 3.0.3 or a reactor shutdown in accordance with LCO 3.0.3.

During movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs, if the inoperable CREOAS subsystem cannot be restored to OPERABLE status within the required Completion Time, the OPERABLE CREOAS subsystem may be placed in the pressurization/filtration mode. This action ensures that the remaining subsystem is OPERABLE, that no failures that would prevent automatic actuation will occur, and that any active failure will be readily detected.

An alternative to Required Action D.1 is to immediately suspend activities that present a potential for releasing radioactivity that might require isolation of the CRE. This places the unit in a condition that minimizes the accident risk.

If applicable, CORE ALTERATIONS and movement of irradiated fuel assemblies in the secondary containment must be suspended immediately. Suspension of these activities shall not preclude completion of movement of a component to a safe position. Also, if applicable, actions must be initiated immediately to suspend OPDRVs to minimize the probability of a vessel draindown and the subsequent potential for fission product release. Actions must continue until the OPDRVs are suspended.

E.1

If both CREOAS subsystems are inoperable in MODE 1, 2, or 3, for reasons other than an inoperable CRE boundary (i.e., Condition B) the CREOAS System may not be capable of performing the intended function and the unit is in a condition outside of the accident analyses. Therefore, LCO 3.0.3 must be entered immediately.

(continued)

BASES

ACTIONS (continued)

F.1, F.2, and F.3

The Required Actions of Condition F are modified by a Note indicating that LCO 3.0.3 does not apply. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, inability to suspend movement of irradiated fuel assemblies is not sufficient reason to require either an entry into LCO 3.0.3 or a reactor shutdown in accordance with LCO 3.0.3.

During movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs, with two CREOAS subsystems inoperable or with one or more CREOAS subsystems inoperable due to an inoperable CRE boundary, action must be taken immediately to suspend activities that present a potential for releasing radioactivity that might require pressurization of the CRE. This places the unit in a condition that minimizes the accident risk.

If applicable, CORE ALTERATIONS and movement of irradiated fuel assemblies in the secondary containment must be suspended immediately Suspension of these activities shall not preclude completion of movement of a component to a safe position. If applicable, actions must be initiated immediately to suspend OPDRVs to minimize the probability of a vessel draindown and subsequent potential for fission product release. Actions must continue until the OPDRVs are suspended.

SURVEILLANCE REQUIREMENTS

SR 3.7.3.1

This SR verifies that a CREOAS fan in a standby mode starts on demand from the control room and continues to operate with flow through the HEPA filters and charcoal adsorbers. Standby systems should be checked periodically to ensure that they start and function properly. As the environmental and normal operating conditions of this system are not severe, testing each subsystem once every month provides an adequate check on this system. Systems with heaters must be operated for $\geq$ 15 continuous minutes with the heaters energized. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.7.3.2

This SR verifies that the required CREOAS testing is performed in accordance with the Ventilation Filter Testing Program (VFTP). The VFTP includes testing HEPA filter performance, charcoal adsorber efficiency, minimum system flow rate, and the physical properties of the activated charcoal (general use and following specific operations). Specific test Frequencies and additional information are discussed in detail in the VFTP.

SR 3.7.3.3

This SR verifies that on an actual or simulated initiation signal, each CREOAS subsystem starts and operates. The LOGIC SYSTEM FUNCTIONAL TEST in SR 3.3.7.1.5 overlaps this SR to provide complete testing of the safety function. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.7.3.4

This SR verifies the OPERABILITY of the CRE boundary by testing for unfiltered air inleakage past the CRE boundary and into the CRE. The details of the testing are specified in the Control Room Envelope Habitability Program.

The CRE is considered habitable when the radiological dose to CRE occupants calculated in the licensing basis analyses of DBA consequences is no more than 5 rem whole body or its equivalent to any part of the body and the CRE occupants are protected from hazardous chemicals and smoke. This SR verifies that the unfiltered air inleakage into the CRE is no

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

greater than the flow rate assumed in the licensing basis analyses of DBA consequences. When unfiltered air inleakage is greater than the assumed flow rate, Condition B must be entered. Required Action B.3 allows time to restore the CRE boundary to OPERABLE status provided mitigating actions can ensure that the CRE remains within the licensing basis habitability limits for the occupants following an accident. Compensatory measures are discussed in Regulatory Guide 1.196, Section C.2.7.3, (Ref. 7) which endorses, with exceptions, NEI 99-03, Section 8.4 and Appendix F (Ref. 8). These compensatory measures may also be used as mitigating actions as required by Required Action B.2. Temporary analytical methods may also be used as compensatory measures to restore OPERABILITY (Ref. 9). Options for restoring the CRE boundary to OPERABLE status include changing the licensing basis DBA consequence analysis, repairing the CRE boundary, or a combination of these actions. Depending upon the nature of the problem and the corrective action, a full scope inleakage test may not be necessary to establish that the CRE boundary has been restored to OPERABLE status.

BASES

REFERENCES

1. FSAR, Chapter 6.
2. FSAR, Chapter 9.
3. FSAR, Chapter 15.
4. FSAR, Section 6.4.1.
5. FSAR, Section 6.4.
6. FSAR, Section 9.5.
7. Regulatory Guide 1.196.
8. NEI 99-03, "Control Room Habitability Assessment," June 2001.
9. Letter from Eric J. Leeds (NRC) to James W. Davis (NEI) dated January 30, 2004, "NEI Draft White Paper, Use of Generic Letter 91-18 Process and Alternative Source Terms in the Context of Control Room Habitability." (ADAMS Accession No. ML040300694).