

LIMITING CONDITION FOR OPERATION (Continued)ACTION: (Continued)

- c. The leakage rate to less than or equal to 11.5 scf per hour for any one main steam line isolation valve, and
- d. The combined leakage rate for all ECCS and RCIC containment isolation valves in hydrostatically tested lines which penetrate the primary containment to less than or equal to 1 gpm times the total number of such valves,

prior to increasing reactor coolant system temperature above 200°F.

SURVEILLANCE REQUIREMENTS

~~4.6.1.2 The primary containment leakage rates shall be demonstrated at the following test schedule and shall be determined in conformance with the criteria specified in Appendix J of 10 CFR Part 50 using the methods and provisions of ANSI N45.4-1972.~~

Perform required primary containment leakage rate testing in accordance with the Primary Containment Leakage Rate Testing Program described in Specification 6.8.4.f.

- a. Deleted
- b. Deleted
- c. Deleted

- ~~a. Three Type A Overall Integrated Containment Leakage Rate tests shall be conducted at 40 ± 10 month intervals during shutdown at P_s , during each 10 year service period. The third test of each set shall be conducted during the shutdown for the 10 year plant inservice inspection.~~
- ~~b. If any periodic Type A test fails to meet $0.75 L_s$, the test schedule for subsequent Type A tests shall be reviewed and approved by the Commission. If two consecutive Type A tests fail to meet $0.75 L_s$, a Type A test shall be performed at least every 18 months until two consecutive Type A tests meet $0.75 L_s$, at which time the above test schedule may be resumed.~~
- ~~c. The accuracy of each Type A test shall be verified by a supplemental test which:

 - ~~1. Confirms the accuracy of the test by verifying that the supplemental test result, L_c , minus the sum of the Type A and the superimposed leak, L_o , are equal to or less than $0.25 L_s$.~~
 - ~~2. Has duration sufficient to establish accurately the change in leakage rate between the Type A test and the supplemental test.~~
 - ~~3. Requires the quantity of gas injected into the containment or bled from the containment during the supplemental test to be between $0.75 L_s$ and $1.25 L_s$.~~~~

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CONTAINMENT SYSTEMSSURVEILLANCE REQUIREMENTS (Continued)

~~d. Type B and C tests shall be conducted with gas at P₀*, at intervals no greater than 24 months*** except for tests involving:~~

- ~~1. Air Locks~~
- ~~2. Main steam line isolation valves,~~
- ~~3. Valves pressurized with fluid from a seal system,~~
- ~~4. ECCS and RCIC containment isolation valves in hydrostatically tested lines which penetrate the primary containment, and~~
- ~~5. Purge supply and exhaust isolation valves with resilient seals.~~

~~e. Air locks shall be tested and demonstrated OPERABLE per Surveillance Requirement 4.6.1.3.~~

d. Deleted

e. Deleted

f. Main steam line isolation valves shall be leak tested at least once ~~per 18 months.~~ per 30 months.

~~g. Leakage from isolation valves that are sealed with fluid from a seal system may be excluded, subject to the provisions of Appendix J, Section III.C.3, when determining the combined leakage rate provided the seal system and valves are pressurized to at least 1.10 P₀, and the seal system capacity is adequate to maintain system pressure for at least 30 days.~~

~~h. ECCS and RCIC containment isolation valves in hydrostatically tested lines which penetrate the primary containment shall be leak tested at least once per 18 months.~~

~~i. Purge supply and exhaust isolation valves with resilient material seals shall be tested and demonstrated OPERABLE per Surveillance Requirements 4.6.1.8.1 and 4.6.1.8.2.~~

~~j. The provisions of Specification 4.6.2 are not applicable to 24 month or 40 ± 10 month surveillance intervals.~~

g. Deleted

h. Deleted

i. Deleted

j. Deleted

~~*Unless a hydrostatic test is required per Table 3.6.3-1.~~

~~***For those tests conducted during refueling outages, the 24 month interval may be exceeded by no more than 3 months.~~

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CONTAINMENT SYSTEMS

LIMITING CONDITION FOR OPERATION (Continued)

ACTION: (Continued)

3. Otherwise, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
4. The provisions of Specification 3.0.4 are not applicable.
- c. With the primary containment air lock inoperable, except as a result of an inoperable air lock door or an inoperable interlock mechanism, maintain at least one air lock door closed; restore the inoperable air lock to OPERABLE status within 24 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

SURVEILLANCE REQUIREMENTS

4.6.1.3 Each primary containment air lock shall be demonstrated OPERABLE:

- a. By verifying interlock operation (i.e., that only one door in each air lock can be opened at a time).
 1. Prior to using the air lock in Operating Conditions 1, 2 and 3 but not required more than once per 6 months,
 2. Following maintenance that could affect the interlock mechanism.
- b. Within 72 hours following each closing, except when the air lock is being used for multiple entries, then at least once per 72 hours, by verifying seal leakage rate less than or equal to 0.025 L_a when the gap between the door seals is pressurized to 10 psig.
- c. By conducting an overall air lock leakage test at P_a, and by verifying that the overall air lock leakage rate is within its limit:
 - ~~1. At least once per 6 months###, and~~
 1. At intervals determined in accordance with 10 CFR 50 Appendix J using the methods and provisions outlined in the Primary Containment Leakage Rate Testing Program described in Specification 6.8.4.f., and
 2. Prior to establishing PRIMARY CONTAINMENT INTEGRITY when maintenance had been performed on the air lock that could affect the air lock sealing capability*.

~~###The provisions of Specification 4.0.2 are not applicable.~~

* Exception to Appendix J of 10 CFR 50.

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

d. Radioactive Effluent Controls Program (continued)

- 9) Limitations on the annual and quarterly dose to a MEMBER OF THE PUBLIC from Iodine-131, Iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR Part 50,
- 10) Limitations on venting and purging of the containment through the Standby Gas Treatment System to maintain releases as low as reasonably achievable, and
- 11) Limitations on the annual dose or dose commitment to any MEMBER OF THE PUBLIC due to releases of radioactivity and to radiation from uranium fuel cycle sources conforming to 40 CFR Part 190.

e. Radiological Environmental Monitoring Program

A program shall be provided to monitor the radiation and radionuclides in the environs of the plant. The program shall provide (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the effluent monitoring program and modeling of environmental exposure pathways. The program shall (1) be contained in the ODCM, (2) conform to the guidance of Appendix I to 10 CFR Part 50, and (3) include the following:

- 1) Monitoring, sampling, analysis and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the ODCM.
- 2) A Land Use Census to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the monitoring program are made if required by the results of this census, and
- 3) Participation in the Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.

f. Primary Containment Leakage Rate Testing Program

A program shall be established to implement the leakage testing for the primary containment as required by 10 CFR 50.54(o) and 10 CFR 50 Appendix J. This program shall be in accordance with the guidelines of Regulatory Guide 1.163, Revision 0, "Performance-Based Containment Leak-Test Program", as modified by approved exemptions and the following exceptions:

1. Compensation for flow meter inaccuracies in excess of those specified in standard ANSI/ANS 56.8-1994 will be accomplished by increasing the actual instrument reading by the amount of the full scale inaccuracy when assessing the effect of local leak rates against the criteria established in Technical Specification 3.6.1.2.b.

ATTACHMENT 3
Basis for No Significant Hazards Consideration Determination

In accordance with the criteria established in 10 CFR 50.92, the Supply System has evaluated the proposed amendment to Operating License NPF-21 and determined that it does not represent a significant hazards consideration. The following discussion is provided in support of this conclusion.

1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed license amendments revise the Technical Specifications to reflect the adoption of a performance-based containment leakage testing program. The Nuclear Regulatory Commission approved the use of a performance-based option when it amended 10 CFR Part 50 Appendix J (60 FR 49495).

No changes are proposed to containment leakage limits currently specified in the WNP-2 Technical Specifications. Consequently, the radiological consequences of containment leakage during and after an accident are unchanged, and remain as documented in the Final Safety Analysis Report. The proposed change is limited to allowing use of either Option A or Option B of Appendix J of 10 CFR Part 50 as alternatives in establishing requirements for containment leak testing, and, because no changes to allowable leakage rates are being proposed, the effect would be limited to establishing testing schedules on the basis of actual performance of the primary containment and penetrations per Appendix J Option B, rather than as prescribed by Appendix J Option A. The test methodology required under Appendix J Option B is defined in ANSI/ANS 56.8-1994, and is technically equivalent to that currently in use at WNP-2. Neither the frequency of Type A, B, and C containment testing nor leak test methodology is identified as a factor in initiation, progression, or mitigation of any accident. Therefore the proposed change does not involve a significant increase in the probability or consequences of a previously evaluated accident.

2. Does the change create the possibility of a new or different kind of accident from any previously evaluated?

The proposed change does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed license amendments revise the Technical Specifications to reflect the adoption of a performance-based containment leakage testing program. The Nuclear Regulatory Commission approved the use of a performance-based option when it amended 10 CFR Part 50 Appendix J (60 FR 49495).

The proposed change is limited to allowing use of either Option A or Option B of Appendix J of 10 CFR Part 50 as alternatives in establishing requirements for containment leak testing, and, because no changes to allowable leakage rates are being proposed, the effect would be limited to establishing testing schedules on the basis of actual performance of the primary containment and penetrations per Appendix J Option B, rather than as prescribed by Appendix J Option A. The test methodology required under Appendix J Option B is defined in ANSI/ANS 56.8-1994, and is technically equivalent to that currently in use at WNP-2. Type A, B, or C testing will continue to be performed using these accepted methods, although on a schedule permitted under Appendix J. Therefore the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the change involve a significant reduction in margin of safety?

The proposed change does not involve a significant reduction in margin of safety, but will result in reduction of cumulative occupational radiation exposure due to reduced leak test frequencies. An assessment of potential increased risk to the public resulting from reduced containment test frequencies, as may result from implementation of Option B of Appendix J, is summarized in NUREG-1493, "Performance-Based Containment Leak-Test Program." The conclusion is that reducing the frequency of integrated leak rate testing (ILRT) from the current three per ten-year period to one in a twenty year period would lead to only a small increase in risk because (1) ILRTs identify very few leaks that are not also found by routine Type C local leak rate tests, and (2) the experience is that as-found test results for the few failed ILRTs were only marginally above the acceptance criterion which are very conservative with respect to public health and safety.

The report identifies that Type B and C local leak rate tests identify the majority (>95%) of all unacceptable leaks. However, a performance-based schedule for Type B and C tests can be adopted without significant risk because Type B test failures are infrequent, and essentially all detected leaks are through containment isolation valves. Based on a detailed evaluation, no correlation of Type C test failures was found with type of containment isolation valve or plant service, but it was possible to correlate Type C test failures with repeated failures of individual components. A performance-based test schedule would require continuing frequent testing of valves that failed prior tests, and would therefore result in approximately the same test frequency for such valves as is currently required under Appendix J Option A.

Therefore, the proposed change does not involve a significant reduction in margin of safety because any reduction in test frequencies would be based on actual measured performance, and would therefore not result in less frequent testing of Type B or C penetrations having a history of weaker performance. The Primary Containment Leakage Rate Testing Program will assure that the overall leakage rate, and thus onsite and offsite post-accident radiation exposure, is maintained within allowable limits.

Attachment 4

"Improved" Technical Specification for Containment Leakage Testing

3.6 CONTAINMENT SYSTEMS

3.6.1.1 Primary Containment

LC0 3.6.1.1 Primary containment shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Primary containment inoperable.	A.1 Restore primary containment to OPERABLE status.	1 hour
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	12 hours
	<u>AND</u> B.2 Be in MODE 4.	36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.6.1.1.1 Perform required visual examinations and leakage rate testing except for primary containment air lock testing, in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions.</p> <p>The leakage rate acceptance criterion is $\leq 1.0 L_a$. However, during the first unit startup following testing performed in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, the leakage rate acceptance criteria are $< 0.6 L_a$ for the Type B and Type C tests, and $< 0.75 L_a$ for the Type A test.</p>	<p>-----NOTE----- SR 3.0.2 is not applicable -----</p> <p>In accordance with 10 CFR 50, Appendix J, as modified by approved exemptions</p>
<p>SR 3.6.1.1.2 Verify drywell to suppression chamber bypass leakage rate is less than or equal to the equivalent leakage rate through an orifice 0.005 ft^2 at an initial differential pressure of $\geq 1.5 \text{ psid}$.</p>	<p>24 months</p> <p><u>AND</u></p> <p>-----NOTE----- Only required after two consecutive tests fail and continues until two consecutive tests pass -----</p> <p>12 months</p>

3.6 CONTAINMENT SYSTEMS

3.6.1.2 Primary Containment Air Lock

LCO 3.6.1.2 The primary containment air lock shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

NOTES

1. Entry and exit is permissible to perform repairs of the air lock components.
2. Enter applicable Conditions and Required Actions of LCO 3.6.1.1, "Primary Containment," when air lock leakage results in exceeding overall containment leakage rate acceptance criteria.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One primary containment air lock door inoperable.	<p>-----NOTES-----</p> <ol style="list-style-type: none"> 1. Required Actions A.1, A.2, and A.3 are not applicable if both doors in the air lock are inoperable and Condition C is entered. 2. Entry and exit is permissible for 7 days under administrative controls. <p>-----</p>	
	<p>A.1 Verify the OPERABLE door is closed.</p> <p><u>AND</u></p>	<p>1 hour</p> <p>(continued)</p>

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.2 Lock the OPERABLE door closed.	24 hours
	<p><u>AND</u></p> <p>A.3 -----NOTE----- Air lock doors in high radiation areas or areas with limited access due to inerting may be verified locked closed by administrative means. -----</p> <p>Verify the OPERABLE door is locked closed.</p>	Once per 31 days
B. Primary containment air lock interlock mechanism inoperable.	<p>-----NOTES-----</p> <p>1. Required Actions B.1, B.2, and B.3 are not applicable if both doors in the air lock are inoperable and Condition C is entered.</p> <p>2. Entry into and exit from primary containment is permissible under the control of a dedicated individual.</p> <p>-----</p>	
	<p>B.1 Verify an OPERABLE door is closed.</p> <p><u>AND</u></p>	<p>1 hour</p> <p>(continued)</p>

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. (continued)	B.2 Lock an OPERABLE door closed.	24 hours
	<p><u>AND</u></p> <p>B.3 -----NOTE----- Air lock doors in high radiation areas or areas with limited access due to inerting may be verified locked closed by administrative means. -----</p> <p>Verify an OPERABLE door is locked closed.</p>	Once per 31 days
C. Primary containment air lock inoperable for reasons other than Condition A or B.	C.1 Initiate action to evaluate primary containment overall leakage rate per LCO 3.6.1.1, using current air lock test results.	Immediately
	<p><u>AND</u></p> <p>C.2 Verify a door is closed.</p>	1 hour
	<p><u>AND</u></p> <p>C.3 Restore air lock to OPERABLE status.</p>	24 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action and associated Completion Time not met.	D.1 Be in MODE 3.	12 hours
	<u>AND</u>	
	D.2 Be in MODE 4.	36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.1.2.1	<p>-----NOTES-----</p> <ol style="list-style-type: none">1. An inoperable air lock door does not invalidate the previous successful performance of the overall air lock leakage test.2. Results shall be evaluated against acceptance criteria of SR 3.6.1.1.1 in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions. <p>-----</p> <p>Perform required primary containment air lock leakage rate testing in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions.</p> <p>The acceptance criteria for air lock testing are:</p> <ol style="list-style-type: none">a. Overall air lock leakage rate is $\leq 0.05 L_a$ when tested at $\geq P_a$.b. For each door, leakage rate is $\leq 0.025 L_a$ when the gap between the door seals is pressurized to ≥ 10 psig.	<p>-----NOTE-----</p> <p>SR 3.0.2 is not applicable</p> <p>-----</p> <p>In accordance with 10 CFR 50, Appendix J, as modified by approved exemptions</p>
SR 3.6.1.2.2	Verify only one door in the primary containment air lock can be opened at a time.	24 months.

3.6 CONTAINMENT SYSTEMS

3.6.1.3 Primary Containment Isolation Valves (PCIVs)

LCO 3.6.1.3 Each PCIV, except reactor building-to-suppression chamber vacuum breakers, shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,
When associated instrumentation is required to be OPERABLE per LCO 3.3.6.1, "Primary Containment Isolation Instrumentation."

ACTIONS

NOTES

1. Penetration flow paths may be unisolated intermittently under administrative controls.
2. Separate Condition entry is allowed for each penetration flow path.
3. Enter applicable Conditions and Required Actions for systems made inoperable by PCIVs.
4. Enter applicable Conditions and Required Actions of LCO 3.6.1.1, "Primary Containment," when PCIV leakage results in exceeding overall containment leakage rate acceptance criteria.

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>A. -----NOTE----- Only applicable to penetration flow paths with two PCIVs. -----</p> <p>One or more penetration flow paths with one PCIV inoperable except due to leakage not within limit.</p>	<p>A.1 Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured.</p> <p><u>AND</u></p>	<p>4 hours except for main steam line</p> <p><u>AND</u></p> <p>8 hours for main steam line</p> <p>(continued)</p>

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	<p>A.2</p> <p>-----NOTE----- Isolation devices in high radiation areas may be verified by use of administrative means. -----</p> <p>Verify the affected penetration flow path is isolated.</p>	<p>Once per 31 days for isolation devices outside primary containment</p> <p><u>AND</u></p> <p>Prior to entering MODE 2 or 3 from MODE 4 if primary containment was de-inerted while in MODE 4, if not performed within the previous 92 days, for isolation devices inside primary containment.</p>

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>B. -----NOTE----- Only applicable to penetration flow paths with two PCIVs. -----</p> <p>One or more penetration flow paths with two PCIVs inoperable except due to leakage not within limit.</p>	<p>B.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>1 hour</p>
<p>C. -----NOTE----- Only applicable to penetration flow paths with only one PCIV. -----</p> <p>One or more penetration flow paths with one PCIV inoperable except due to leakage not within limit.</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>4 hours except for excess flow check valves (EFCVs)</p> <p><u>AND</u></p> <p>12 hours for EFCVs</p> <p>(continued)</p>

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. (continued)	<p>C.2 -----NOTE----- Isolation devices in high radiation areas may be verified by use of administrative means. -----</p> <p>Verify the affected penetration flow path is isolated.</p>	<p>Once per 31 days for isolation devices outside primary containment</p> <p><u>AND</u></p> <p>Prior to entering MODE 2 or 3 from MODE 4 if primary containment was de-inerted while in MODE 4, if not performed within the previous 92 days, for isolation devices inside primary containment</p>

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. One or more penetration flow paths with leakage rate not within limit.	D.1 Restore leakage rate to within limit.	4 hours except for main steam line <u>AND</u> 8 hours for main steam line
E. Required Action and associated Completion Time of Condition A, B, C, or D not met in MODE 1, 2, or 3.	E.1 Be in MODE 3. <u>AND</u> E.2 Be in MODE 4.	12 hours 36 hours
F. Required Action and associated Completion Time of Condition A, B, C, or D not met for PCIV(s) required to be OPERABLE during MODE 4 or 5.	F.1 Initiate action to suspend operations with a potential for draining the reactor vessel (OPDRVs). <u>OR</u> F.2 Initiate action to restore valve(s) to OPERABLE status.	Immediately Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.6.1.3.1 -----NOTE----- Not required to be met when the 24 inch and 30 inch primary containment purge valves are open for inerting, de-inerting, pressure control, ALARA or air quality considerations for personnel entry, or Surveillances that require the valves to be open. ----- Verify each 24 inch and 30 inch primary containment purge valve is closed.</p>	<p>31 days</p>
<p>SR 3.6.1.3.2 -----NOTES----- 1. Valves and blind flanges in high radiation areas may be verified by use of administrative means. 2. Not required to be met for PCIVs that are open under administrative controls. ----- Verify each primary containment isolation manual valve and blind flange that is located outside primary containment and is required to be closed during accident conditions is closed.</p>	<p>31 days</p>

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SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.6.1.3.3 -----NOTES-----</p> <ol style="list-style-type: none"> 1. Valves and blind flanges in high radiation areas may be verified by use of administrative means. 2. Not required to be met for PCIVs that are open under administrative controls. <p>-----</p> <p>Verify each primary containment isolation manual valve and blind flange that is located inside primary containment and is required to be closed during accident conditions is closed.</p>	<p>Prior to entering MODE 2 or 3 from MODE 4 if primary containment was de-inerted while in MODE 4, if not performed within the previous 92 days</p>
<p>SR 3.6.1.3.4 Verify continuity of the traversing incore probe (TIP) shear isolation valve explosive charge.</p>	<p>31 days</p>
<p>SR 3.6.1.3.5 Verify the isolation time of each power operated and each automatic PCIV, except MSIVs, is within limits.</p>	<p>In accordance with the Inservice Testing Program</p>
<p>SR 3.6.1.3.6 Verify the isolation time of each MSIV is ≥ 3 seconds and ≤ 5 seconds.</p>	<p>In accordance with the Inservice Testing Program</p>

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
SR 3.6.1.3.7 Verify each automatic PCIV actuates to the isolation position on an actual or simulated isolation signal.	24 months
SR 3.6.1.3.8 Verify each EFCV actuates to the isolation position on an actual or simulated instrument line break signal.	24 months
SR 3.6.1.3.9 Remove and test the explosive squib from each shear isolation valve of the TIP System.	24 months on a STAGGERED TEST BASIS
SR 3.6.1.3.10 Verify the combined leakage rate for all secondary containment bypass leakage paths is ≤ 0.74 scfh when pressurized to $\geq P_a$.	<p>-----NOTE----- SR 3.0.2 is not applicable -----</p> <p>In accordance with 10 CFR 50, Appendix J, as modified by approved exemptions</p>

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.6.1.3.11 Verify leakage rate through each MSIV is ≤ 11.5 scfh when tested at ≥ 25.0 psig.</p>	<p>-----NOTE----- SR 3.0.2 is not applicable -----</p> <p>In accordance with 10 CFR 50, Appendix J, as modified by approved exemptions.</p>
<p>SR 3.6.1.3.12 Verify combined leakage rate of ≤ 1 gpm times the total number of PCIVs through hydrostatically tested lines that penetrate the primary containment is not exceeded when these isolation valves are tested at $\geq 1.1 P_a$.</p>	<p>-----NOTE----- SR 3.0.2 is not applicable -----</p> <p>In accordance with 10 CFR 50, Appendix J, as modified by approved exemptions.</p>

