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10 CFR 50.90

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Subject: Brunswick Steam Electric Plant, Unit Nos. 1 and 2
Renewed Facility Operating License Nos. DPR-71 and DPR-62
Docket Nos. 50-325 and 50-324
Application to Revise Technical Specifications to Adopt TSTF-269, "Allow
Administrative Means of Position Verification for Locked or Sealed Valves"

Ladies and Gentlemen:

Pursuant to 10 CFR 50.90, Duke Energy Progress, LLC (Duke Energy), is submitting a request for an amendment to the Technical Specifications (TS) for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2. The proposed change, consistent with the NRC-approved Technical Specification Task Force Traveler 269 (i.e., TSTF-269-A, Revision 2), modifies requirements for repetitive verification of the status of locked, sealed, or secured components to allow the verification to be by administrative means.

The Enclosure to this letter provides a description and assessment of the proposed change. Unit 1 and 2 TS Mark-Ups are provided in Enclosure Attachments 1 and 2, respectively. The revised (i.e., typed) Unit 1 and 2 TS pages are included as Enclosure Attachments 3 and 4, respectively. In addition, Unit 1 TS Bases Mark-Ups, directly related to the proposed change, are provided in Attachment 5 for information.

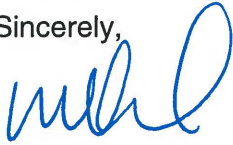
Approval of the proposed amendment is requested one year from completion of the NRC acceptance review. Once approved, the amendment shall be implemented within 120 days. In accordance with 10 CFR 50.91, Duke Energy is providing a copy of the proposed license amendment to the designated representative for the State of North Carolina.

This document contains no regulatory commitments.

Please refer any questions regarding this submittal to Mr. Lee Grzeck, Manager - Regulatory Affairs, at (910) 832-2487.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed on
December 14, 2018.

Sincerely,



William R. Gideon

SBY/sby

Enclosure:

- Description and Assessment of the Proposed Change
- Attachment 1. Unit 1 Technical Specifications – Mark-Ups
- Attachment 2. Unit 2 Technical Specifications – Mark-Ups
- Attachment 3. Unit 1 Technical Specifications – Revised Pages
- Attachment 4. Unit 2 Technical Specifications – Revised Pages
- Attachment 5. Unit 1 Technical Specification Bases – Mark-Ups (For Information Only)

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Description and Assessment of the Proposed Change

Subject: Application to Revise Technical Specifications to Adopt TSTF-269, "Allow Administrative Means of Position Verification for Locked or Sealed Valves"

1.0 SUMMARY DESCRIPTION

2.0 DETAILED DESCRIPTION

2.1 Description of Proposed Change

2.2 Description of Variances

3.0 TECHNICAL EVALUATION

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

4.2 Precedent

4.3 No Significant Hazards Consideration Determination Analysis

4.4 Conclusions

5.0 ENVIRONMENTAL CONSIDERATION

6.0 REFERENCES

ATTACHMENTS:

1. Unit 1 Technical Specifications – Mark-Ups
2. Unit 2 Technical Specifications – Mark-Ups
3. Unit 1 Technical Specifications – Revised Pages
4. Unit 2 Technical Specifications – Revised Pages
5. Unit 1 Technical Specification Bases – Mark-Ups (For Information Only)

1.0 Summary Description

Duke Energy Progress, LLC (Duke Energy), is requesting a revision to the Technical Specifications (TSs) for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2. The proposed license amendments, consistent with the NRC-approved Technical Specification Task Force Traveler (TSTF) 269, Revision 2 (i.e., Reference 6.1), modify requirements for repetitive verification of the status of locked, sealed, or secured components to allow the verification to be by administrative means. TSTF-269-A, Revision 2, "Allow Administrative Means of Position Verification for Locked or Sealed Valves" was approved by the NRC on July 26, 1999.

2.0 Detailed Description

2.1 Description of Proposed Change

The proposed change modifies Technical Specification (TS) 3.6.1.3, "Primary Containment Isolation Valves (PCIVs)," and TS 3.6.4.2, "Secondary Containment Isolation Dampers (SCIDs)." These specifications require penetration flow paths with inoperable isolation devices be isolated and periodically verified to be isolated. Consistent with TSTF-269-A, Revision 2, notes are proposed to be added to TS 3.6.1.3, Required Actions A.2 and C.2, and TS 3.6.4.2, Required Action A.2, to allow isolation devices that are locked, sealed, or otherwise secured to be verified using administrative means.

Unit 1 and Unit 2 TS Mark-Ups are provided in Attachments 1 and 2 respectively; Attachments 3 and 4 provide the revised, typed TS pages. In addition, Unit 1 TS Bases Mark-Ups directly related to the proposed change are provided in Attachment 5 for information.

2.2 Description of Variances

TSTF-269 also modified Specification 3.6.1.3, Required Action E.2, which is optional in the Standard BWR/4 Technical Specifications (i.e., Reference 6.2). The equivalent of Condition E does not appear in the BSEP TSs. This variation does not affect the applicability of TSTF-269 to the proposed license amendments.

3.0 Technical Evaluation

The purpose of the periodic verification that a penetration with an inoperable isolation valve continues to be isolated is to detect and correct inadvertent repositioning of the isolation device. However, the function of locking, sealing, or securing an isolation device is to ensure that the device is not inadvertently repositioned. Therefore, it is sufficient to assume that the initial establishment of component status (e.g., isolation valves closed) was performed correctly and subsequent periodic re-verification need only be a verification of the administrative control that ensures that the component remains in the required state. It is unnecessary and undesirable to remove the lock, seal, or other means of securing the component solely to perform an active verification of the required state as it would increase the chance of mispositioning due to the frequent manipulation.

4.0 Regulatory Analysis

4.1 Applicable Regulatory Requirements/Criteria

The regulations of Title 10 of the Code of Federal Regulations (10 CFR), "Technical Specifications," establish the requirements related to the content of the TSs. Section 50.36(c)(2) states:

When a limiting condition for operation of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the technical specifications until the condition can be met.

There is no regulatory requirement that specifies what remedial actions are to be taken when a limiting condition for operation is not met. The proposed changes remove an operational restriction not needed for safety. The proposed changes are consistent with the Standard BWR/4 Technical Specifications (i.e., Reference 6.2).

4.2 Precedent

An example of a plant-specific NRC approval of the changes in TSTF-269-A, Revision 2, is McGuire Nuclear Station, Units 1 and 2, Amendment Numbers 298/277, dated September 18, 2017 (ADAMS Accession No. ML17240A354).

4.3 No Significant Hazards Consideration Analysis

Duke Energy Progress, LLC (Duke Energy), is requesting a revision to the Technical Specifications (TSs) for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2. The proposed license amendments, consistent with the NRC-approved Technical Specification Task Force Traveler (TSTF) 269, Revision 2 (i.e., Reference 6.1), modify requirements for repetitive verification of the status of locked, sealed, or secured components to allow the verification to be by administrative means. TSTF-269-A, Revision 2, "Allow Administrative Means of Position Verification for Locked or Sealed Valves" was approved by the NRC on July 26, 1999.

Duke Energy has evaluated whether a significant hazards consideration is involved with the proposed amendment(s) by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

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

Response: No

The proposed change modifies Technical Specification (TS) 3.6.1.3, "Primary Containment Isolation Valves (PCIVs)" and TS 3.6.4.2, "Secondary Containment Isolation Dampers (SCIDs)." These specifications require penetration flow paths with inoperable isolation devices be isolated and periodically verified to be isolated. Consistent with TSTF-269-A, Revision 2, notes are proposed to be added to TS 3.6.1.3, Required Actions A.2 and C.2, and TS 3.6.4.2, Required Action A.2, to allow isolation devices that are locked, sealed, or otherwise secured to be verified using administrative means.

The proposed change does not affect any plant equipment, test methods, or plant operation, and is not an initiator of any analyzed accident sequence. The inoperable containment penetrations will continue to be isolated, and hence perform their isolation function. Operation in accordance with the proposed TSs will ensure that all analyzed accidents will continue to be mitigated as previously analyzed.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

Response: No

The proposed change does not involve a physical alteration to the plant (i.e., no new or different type of equipment will be installed) or a change to the methods governing normal plant operation. Furthermore, the change does not alter the assumptions made in the safety analysis. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Response: No

The proposed change will not affect operation of plant equipment or the function of any equipment assumed in the accident analysis. Affected containment penetrations will continue to be isolated as required by the existing TSs. Therefore, the proposed change does not involve a significant reduction in safety margin.

Based on the above, Duke Energy concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

4.4 Conclusions

In conclusion, based on the discussion above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the NRC regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 Environmental Consideration

The proposed change would alter a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed change does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore,

pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed change.

6.0 References

- 6.1 TSTF-269-A, Revision 2, "Allow Administrative Means of Position Verification for Locked or Sealed Valves".
- 6.2 NUREG-1433, Revision 4, "Standard Technical Specifications General Electric Plants, BWR/4," dated April 2012.

Unit 1 Technical Specifications – Mark-Ups

NOTES

ACTIONS

| CONDITION | REQUIRED ACTION | COMPLETION TIME |
|----------------|---|---|
| A. (continued) | <p>A.2</p> <p>NOTE</p> <p>1. Isolation devices in high radiation areas may be verified by use of administrative means.</p> <p>2. Isolation devices that are locked, sealed, or otherwise secured 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 for MSIV 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> | 2 hours |
| <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.</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 -----NOTE----- 1. 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>8 hours except for excess flow check valves (EFCVs) <u>AND</u> 12 hours for EFCVs</p> <p>Once per 31 days</p> |

2. Isolation devices that are locked, sealed, or otherwise secured may be verified by use of administrative means.

NOTES

(continued)

ACTIONS

| CONDITION | REQUIRED ACTION | COMPLETION TIME |
|---|---|--------------------------------------|
| <p>A. (continued)</p> <p>2. Isolation devices that are locked, sealed, or otherwise secured may be verified by use of administrative means.</p> | <p>A.2</p> <p>NOTE</p> <p>1. 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>NOTES</p> <p>Once per 92 days</p> |
| <p>B. NOTE</p> <p>Only applicable to penetration flow paths with two isolation dampers.</p> <p>One or more penetration flow paths with two SCIDs inoperable.</p> | <p>B.1</p> <p>Isolate the affected penetration flow path by use of at least one closed and de-activated automatic damper, closed manual damper, or blind flange.</p> | <p>4 hours</p> |
| <p>C. Required Action and associated Completion Time of Condition A or B not met in MODE 1, 2, or 3.</p> | <p>C.1 Be in MODE 3.</p> <p><u>AND</u></p> <p>C.2 Be in MODE 4.</p> | <p>12 hours</p> <p>36 hours</p> |

(continued)

Unit 2 Technical Specifications – Mark-Ups

| ACTIONS | | NOTES |
|----------------|---|---|
| CONDITION | REQUIRED ACTION | COMPLETION TIME |
| A. (continued) | <p>A.2</p> <p>NOTE</p> <p>1. Isolation devices in high radiation areas may be verified by use of administrative means.</p> <p>2. Isolation devices that are locked, sealed, or otherwise secured 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 for MSIV 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> | 2 hours |
| <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.</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 -----NOTE----- 1. 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>8 hours except for excess flow check valves (EFCVs)</p> <p><u>AND</u></p> <p>12 hours for EFCVs</p> <p>NOTES</p> <p>Once per 31 days</p> |

2. Isolation devices that are locked, sealed, or otherwise secured may be verified by use of administrative means.

(continued)

ACTIONS

NOTES

| CONDITION | REQUIRED ACTION | COMPLETION TIME |
|---|---|---------------------------------|
| <p>A. (continued)</p> <p>2. Isolation devices that are locked, sealed, or otherwise secured may be verified by use of administrative means.</p> | <p>A.2</p> <p>NOTE</p> <p>1. 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 92 days</p> |
| <p>B. NOTE</p> <p>Only applicable to penetration flow paths with two isolation dampers.</p> <p>One or more penetration flow paths with two SCIDs inoperable.</p> | <p>B.1</p> <p>Isolate the affected penetration flow path by use of at least one closed and de-activated automatic damper, closed manual damper, or blind flange.</p> | <p>4 hours</p> |
| <p>C. Required Action and associated Completion Time of Condition A or B not met in MODE 1, 2, or 3.</p> | <p>C.1 Be in MODE 3.</p> <p><u>AND</u></p> <p>C.2 Be in MODE 4.</p> | <p>12 hours</p> <p>36 hours</p> |

(continued)

Unit 1 Technical Specifications – Revised Pages

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 use of administrative means. <p>-----</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 for MSIV 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>2 hours</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.</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 use of administrative means. -----</p> <p>Verify the affected penetration flow path is isolated.</p> | <p>8 hours except for excess flow check valves (EFCVs) <u>AND</u> 12 hours for EFCVs</p> <p>Once per 31 days</p> |

(continued)

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 use of administrative means. <p>-----</p> <p>Verify the affected penetration flow path is isolated.</p> | Once per 92 days |
| <p>B. -----NOTE-----</p> <p>Only applicable to penetration flow paths with two isolation dampers.</p> <p>-----</p> <p>One or more penetration flow paths with two SCIDs inoperable.</p> | <p>B.1</p> <p>Isolate the affected penetration flow path by use of at least one closed and de-activated automatic damper, closed manual damper, or blind flange.</p> | 4 hours |
| C. Required Action and associated Completion Time of Condition A or B not met in MODE 1, 2, or 3. | <p>C.1 Be in MODE 3.</p> <p><u>AND</u></p> <p>C.2 Be in MODE 4.</p> | <p>12 hours</p> <p>36 hours</p> |

(continued)

Unit 2 Technical Specifications – Revised Pages

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 use of administrative means. <p>-----</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 for MSIV 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>2 hours</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.</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 use of administrative means. -----</p> <p>Verify the affected penetration flow path is isolated.</p> | <p>8 hours except for excess flow check valves (EFCVs) <u>AND</u> 12 hours for EFCVs</p> <p>Once per 31 days</p> |

(continued)

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 use of administrative means. <p>-----</p> <p>Verify the affected penetration flow path is isolated.</p> | Once per 92 days |
| <p>B. -----NOTE-----</p> <p>Only applicable to penetration flow paths with two isolation dampers.</p> <p>-----</p> <p>One or more penetration flow paths with two SCIDs inoperable.</p> | <p>B.1</p> <p>Isolate the affected penetration flow path by use of at least one closed and de-activated automatic damper, closed manual damper, or blind flange.</p> | 4 hours |
| C. Required Action and associated Completion Time of Condition A or B not met in MODE 1, 2, or 3. | <p>C.1</p> <p>Be in MODE 3.</p> | 12 hours |
| | <p><u>AND</u></p> <p>C.2</p> <p>Be in MODE 4.</p> | 36 hours |

(continued)

Unit 1 Technical Specification Bases – Mark-Ups
(For Information Only)

BASES

two Notes.

Note 1

ACTIONS

Note 2 applies to isolation devices that are locked, sealed, or otherwise secured in position and allows these devices to be verified closed by 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.

A.1 and A.2 (continued)

Condition A is modified by a Note indicating that this Condition is only applicable to those penetration flow paths with two PCIVs. For penetration flow paths with one PCIV, Condition C provides the appropriate Required Actions.

Required Action A.2 is modified by a Note that applies to isolation devices located in high radiation areas, and allows them to be verified by use of administrative means. High radiation areas include the MSIV pit, the RWCU penetration triangle room, the TIP room, and the area between the drywell head and the drywell head shield blocks. Allowing verification by administrative means is considered acceptable, since access to these areas is typically restricted. Therefore, the probability of misalignment of these devices, once they have been verified to be in the proper position, is low.

B.1

With one or more penetration flow paths with two PCIVs inoperable, except for inoperability due to MSIV leakage not within the limit specified in the associated SR to this LCO; either the inoperable PCIVs must be restored to OPERABLE status or the affected penetration flow path must be isolated within 2 hours. The method of isolation must include the use of at least one 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. The 2 hour Completion Time is consistent with the ACTIONS of LCO 3.6.1.1.

Condition B is modified by a Note indicating this Condition is only applicable to penetration flow paths with two PCIVs. For penetration flow paths with one PCIV, Condition C provides the appropriate Required Actions.

C.1 and C.2

With one or more penetration flow paths with one PCIV inoperable, the inoperable valve must be restored to OPERABLE status or the affected penetration flow path must be isolated. The method of isolation must

(continued)

BASES

ACTIONS

C.1 and C.2 (continued)

include the use of at least one 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 8 hour Completion Time for lines other than excess flow check valve (EFCV) lines and within the 12 hour Completion Time for EFCV lines. The Completion Time of 8 hours 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 primary containment OPERABILITY during MODES 1, 2, and 3. The Completion Time of 12 hours is reasonable considering the mitigating effects of the small pipe diameter and restrictive orifice, and the isolation boundary provided by the instrument. In the event the affected penetration flow path is isolated in accordance with Required Action C.1, the affected penetration must be verified to be isolated on a periodic basis. This is necessary to ensure that primary containment penetrations required to be isolated following an accident are isolated. The Completion Time of once per 31 days for verifying each affected penetration is isolated is appropriate because the valves are operated under administrative controls and the probability of their misalignment is low.

two Notes.

Note 2 applies to isolation devices that are locked, sealed, or otherwise secured in position and allows these devices to be verified closed by 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.

Note 1

Condition C is modified by a Note indicating that this Condition is only applicable to penetration flow paths with only one PCIV. For penetration flow paths with two PCIVs, Conditions A and B provide the appropriate Required Actions.

Required Action C.2 is modified by a Note that applies to valves and blind flanges located in high radiation areas and allows them to be verified by use of administrative means. High radiation areas include the MSIV pit, the RWCU penetration triangle room, the TIP room, and the area between the drywell head and the drywell head shield blocks. Allowing verification by administrative means is considered acceptable, since access to these areas is typically restricted. Therefore, the probability of misalignment of these devices, once they have been verified to be in the proper position, is low.

(continued)

BASES

two Notes.

Note 1

ACTIONS

Note 2 applies to isolation devices that are locked, sealed, or otherwise secured in position and allows these devices to be verified closed by 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.

A.1 and A.2 (continued)

per 92 days is appropriate because the devices are operated under administrative controls and the probability of their misalignment is low. This Required Action does not require any testing or device manipulation. Rather, it involves verification that the affected penetration remains isolated.

Required Action A.2 is modified by a Note that applies to devices located in high radiation areas and allows them to be verified closed by use of administrative controls. Allowing verification by administrative controls is considered acceptable, since access to these areas is typically restricted. Therefore, the probability of misalignment, once they have been verified to be in the proper position, is low.

B.1

With two SCIDs in one or more penetration flow paths inoperable, the affected penetration flow path must be isolated within 4 hours. The method of isolation must include the use of at least one 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 damper, a closed manual damper, and a blind flange. The 4 hour Completion Time is reasonable considering the time required to isolate the penetration and the probability of a DBA, which requires the SCIDs to close, occurring during this short time, is very low.

The Condition has been modified by a Note stating that Condition B is only applicable to penetration flow paths with two isolation dampers. This clarifies that only Condition A is entered if one SCID is inoperable in each of two penetrations.

C.1 and C.2

If any Required Action and associated Completion Time cannot be met 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

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