

CONTAINMENT SYSTEMSBASES3/4.6.1 CONTAINMENT (Continued)

[Replace with Bases Mark-up
on the next page.]

3/4.6.1.2 CONTAINMENT LEAKAGE (Continued)

The surveillance testing for measuring leakage rates is consistent with the requirements of Appendix J to 10 CFR 50 with the exception of exemptions granted for testing the airlocks after each opening.

3/4.6.1.3 CONTAINMENT AIR LOCKS

The limitations on closure and leak rate for the containment air locks are required to meet the restrictions on PRIMARY CONTAINMENT INTEGRITY and the containment leakage rate given in Specifications 3.6.1.1 and 3.6.1.2. The specification makes allowances for the fact that there may be long periods of time when the air locks will be in a closed and secured position during reactor operation. Only one closed door in each air lock is required to maintain the integrity of the containment.

The air supply to the containment air lock and seal system is the service and instrument air system. The system consists of two 100% capacity air compressors per unit and can be cross-connected. This system is redundant and extremely reliable and provides system pressure indication in the control room.

3/4.6.1.4 MSIV LEAKAGE CONTROL SYSTEM

Calculated doses resulting from the maximum leakage allowance for the main steam line isolation valves in the postulated LOCA situations would be a small fraction of the 10 CFR 100 guidelines, provided the main steam line system from the isolation valves up to and including the turbine condenser remains intact. Operating experience has indicated that degradation has occasionally occurred in the leak tightness of the MSIV's such that the specified leakage requirements have not always been maintained continuously. The requirement for the leakage control system will reduce the untreated leakage from the MSIV's when isolation of the primary system and containment is required.

3/4.6.1.5 CONTAINMENT STRUCTURAL INTEGRITY

This limitation ensures that the structural integrity of the containment will be maintained comparable to the original design standards for the life of the unit. Structural integrity is required to ensure that the containment will withstand the maximum pressure of 15 psig in the event of a LOCA. A visual inspection in conjunction with Type A leakage tests is sufficient to demonstrate this capability.

BASES MARK-UP:

The following text is taken from Attachment 2 to letter PY-CEI/NRR-1576 L, dated March 1, 1993, with the addition of the new exemption discussed in this letter (PY-CEI/NRR-1577 L):

The surveillance testing for measuring leakage rates is consistent with the requirements of Appendix J to 10 CFR 50 with the exception of the following exemptions:

- a) Section III.D.2(b)(ii) - The air lock seal leakage test of Section III.D.2(b)(iii) of Appendix J may be substituted (following normal air lock door opening) for the full-pressure test provided that no maintenance has been performed that would affect the air locks sealing capability (Reference 1).
- b) Section III.A.5(b) - The design basis allowable leakage rate L_d (rather than the as-left acceptance criterion of 0.75 percent of L_d), is designated as the value against which the as-found Type A test results are compared when scheduling for future periodic Type A tests in accordance with Section III.A.6 of Appendix J (Reference 2).
- c) Section III.A.1(a) - The Type A test does not need to be stopped if excessive leakage is determined, provided the leakage can be isolated and appropriately factored into the test results (Reference 3).

References

- (1) PNPP Safety Evaluation Report Supplement 7, Section 6.2.6 "Containment Leakage Testing," November 1985.
- (2) [Exemption approval letter from the NRC.]
- (3) [Exemption approval letter from the NRC.]