

CONTAINMENT SYSTEMS

DRYWELL BYPASS LEAKAGE

LIMITING CONDITION FOR OPERATION

3.6.2.2 Drywell bypass leakage shall be less than or equal to 10% of the minimum acceptable A/\sqrt{k} design value of 1.18 ft².

APPLICABILITY: When DRYWELL INTEGRITY is required per Specification 3.6.2.1.

ACTION:

With the drywell bypass leakage greater than 10% of the minimum acceptable A/\sqrt{k} design value of 1.18 ft², restore the drywell bypass leakage to within the limit prior to increasing reactor coolant system temperature above 200°F.

SURVEILLANCE REQUIREMENTS

10 years 4.6.2.2 The drywell bypass leakage rate test shall be conducted at least once per 18 months or during each refueling outage at an initial differential pressure of 3.0 psi and the A/\sqrt{k} shall be calculated from the measured leakage. One drywell airlock door shall remain open during the drywell leakage test such that each drywell door is leak tested during at least every other leakage rate test. If any drywell bypass leakage test fails to meet the specified limit, the schedule for subsequent tests shall be reviewed and approved by the Commission. If two consecutive tests fail to meet the limit, a test shall be performed at least once every 18 months until two consecutive tests meet the limit, at which time the above 10-year test schedule may be resumed.

Frequency shall be increased to ^{at least once per} 36 months; if the subsequent test meets the limit, the above 10-year schedule may be resumed.

3.6 CONTAINMENT SYSTEMS

3.6.5.1 Drywell

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LC0 3.6.5.1 The drywell shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Drywell inoperable.	A.1 Restore drywell 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
(81)	SR 3.6.5.1.1 Verify bypass leakage is \leq [10]% of the bypass leakage limit.	[10] months INSERT 54A
(81)	SR 3.6.5.1.2 Visually inspect the exposed accessible interior and exterior surfaces of the drywell.	[40] months Once prior to performance of each Type A test required by SR 3.6.1.1.1.

INSERT 54A

18 months
following 2
consecutive
tests with
bypass leakage
> 10% of the
bypass leakage
limit until 2
consecutive
tests are \leq 10%
of the bypass
leakage limit

AND

36 months
following a
test with
bypass leakage
> 10% of the
bypass leakage
limit

AND

120 months

BASES

ACTIONS

A.1 (continued)

commensurate with the importance of maintaining the drywell OPERABLE during MODES 1, 2, and 3. This time period also ensures that the probability of an accident (requiring drywell OPERABILITY) occurring during periods when the drywell is inoperable is minimal. Also, the Completion Time is the same as that applied to inoperability of the primary containment in LCO 3.6.1.1, "Primary Containment."

B.1 and B.2

If the drywell 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.

SURVEILLANCE REQUIREMENTS

SR 3.6.5.1.1

The analyses in Reference 2 are based on a maximum drywell bypass leakage. This Surveillance ensures that the actual drywell bypass leakage is $\leq [10\%]$ of the acceptable A/\sqrt{K} design value of $[1.0]$ ft² assumed in the safety analysis. The leakage test is performed ~~every [10] months~~, consistent with the difficulty of performing the test, risk of high radiation exposure, and the remote possibility that a component failure that is not identified by some other drywell or primary containment SR might occur. Operating experience has shown that these components usually pass the Surveillance when performed at the ~~[18]~~ month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

On a performance based frequency

INSERT B110A

SR 3.6.5.1.2

The exposed accessible drywell interior and exterior surfaces are inspected to ensure there are no apparent

(continued)

INSERT B110A

This Surveillance is performed at least once every 10 years. If during the performance of this required Surveillance the drywell bypass leakage rate is $> 10\%$ of the drywell bypass leakage limit the Surveillance Frequency is increased to every 36 months. If during the performance of the subsequent consecutive Surveillance the drywell bypass leakage rate is $\leq 10\%$ of the drywell bypass leakage limit the 10 year Frequency may be resumed. If during the performance of two consecutive Surveillances the drywell bypass leakage is $> 10\%$ of the drywell bypass leakage limit the Surveillance Frequency is increased to at least once every 18 months. The 18 month Frequency is maintained until during the performance of two consecutive Surveillances the drywell bypass leakage rate is $\leq 10\%$ of the drywell bypass leakage limit, at which time the 10 year Frequency may be resumed. For two Surveillances to be considered consecutive the Surveillances must be performed at least 12 months apart.

Since the Frequency is performance based,

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SURVEILLANCE
REQUIREMENTS

SR 3.6.5.1.2 (continued)

in conjunction
with the inspections
of the primary
containment required
by 10 CFR 50, Appendix
J (Ref. 2).

physical defects that would prevent the drywell from performing its intended function. This SR ensures that drywell structural integrity is maintained. The ~~40~~ month Frequency was chosen so that the interior and exterior surfaces of the drywell can be inspected ~~at every other refueling outage~~. Due to the passive nature of the drywell structure, the ~~40~~ month Frequency is sufficient to identify component degradation that may affect drywell structural integrity.

specified

REFERENCES

1. FSAR, Chapter [6] and Chapter [15].
2. 10 CFR 50, Appendix J.