

ATTACHMENT 3
PROPOSED CHANGES
TO
TECHNICAL SPECIFICATION 3.9.4
AND
ASSOCIATED BASES

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TSC-94/94.311.002

REFUELING OPERATIONS

3/4.9.4 CONTAINMENT BUILDING PENETRATIONS

LIMITING CONDITION FOR OPERATION

3.9.4 The containment building penetrations shall be in the following status:

- a. The equipment door closed and held in place by a minimum of four bolts.
- b. ~~A minimum of one door in each airlock is closed.~~ 1. A minimum of one door in the containment Auxiliary Airlock (AAL) is closed.
AND
2. A minimum of one door in the containment Personnel Airlock (PAL) is closed.
OR
The water level is ≥ 23 feet above the reactor vessel flange.
AND
The Reactor has been subcritical for ≥ 95 hours.
AND
An Individual is available to close a PAL door when directed (after the initiation of a fuel handling accident inside containment) within;
 - a. 30 minutes, if the reactor has been subcritical < 165 hours.
OR
 - b. As soon as possible but within 2 hours, if the reactor has been subcritical ≥ 165 hours.
- c. Each penetration providing direct access from the containment atmosphere to the outside atmosphere shall be either:
 - 1) Closed by an isolation valve, blind flange, or manual valve, or
 - 2) Be capable of being closed by an OPERABLE automatic containment purge and exhaust isolation valve.

APPLICABILITY: During CORE ALTERATIONS or movement of irradiated fuel within the containment.

ACTION:

With the requirements of the above specification not satisfied, immediately suspend all operations involving CORE ALTERATIONS or movement of irradiated fuel in the containment building.

SURVEILLANCE REQUIREMENTS

4.9.4 Each of the above required containment building penetrations shall be determined to be either in its ~~closed/isolated~~ required condition or capable of being closed by an OPERABLE automatic containment purge and exhaust isolation valve within 100 hours prior to the start of and at least once per 7 days during CORE ALTERATIONS or movement of irradiated fuel in the containment building by:

- a. Verifying the penetrations are in their ~~closed/isolated~~ required condition, or
- b. Testing the containment purge and exhaust isolation valves per the applicable portions of Specification 4.6.3.2.

SOUTH TEXAS - UNITS 1 & 2

3/4 9-4a

3/4.9.4 CONTAINMENT BUILDING PENETRATIONS - BASES

The requirements on containment building penetration closure and OPERABILITY ensure that a release of radioactive material within containment will be restricted from leakage to the environment. The containment personnel airlock, which is part of the containment pressure boundary, provide a means for personnel access during MODES 1, 2, 3, and 4 operation. During periods of shutdown, when containment closure is not required, the door interlock mechanism may be disabled, allowing both doors of the containment personnel airlock to remain open for extended periods when frequent containment entry is necessary. Both containment personnel airlock doors may be open during CORE ALTERATIONS provided one airlock door is OPERABLE, there is 23 feet of water above the reactor vessel flange, and an individual is available outside the containment personnel airlock to close a door following a fuel handling accident inside containment.

Operability of a containment personnel airlock door requires that the door is capable of being closed, i.e., that the door is unblocked and no cables or hoses run through the personnel airlock. Containment personnel airlock door closure is required to take place within 30 minutes of initiation of a fuel handling accident inside containment if the reactor has been subcritical for less than 165 hours. Fuel movement is not permitted with personnel airlock doors open, if the reactor has not been subcritical for ≥ 95 hours. If the reactor has been subcritical for 165 hours or more, containment personnel airlock door closure is to occur as soon as practicable, but is assumed to occur within 2 hours to be consistent with the accident analysis. These requirements assure that the associated doses are limited to within acceptable levels. The requirement to have 23 feet of water above the reactor vessel flange is consistent with the fuel handling accident analysis assumptions, Regulatory Guide 1.25, and Technical Specification 3.9.10, Water Level - Refueling Cavity.