

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.6.4.1.3 -----NOTE----- The number of standby gas treatment (SGT) subsystem(s) required for this Surveillance is dependent on the secondary containment configuration, and shall be one less than the number required to meet LCO 3.6.4.3, "Standby Gas Treatment (SGT) System," for the given configuration.</p> <p>-----</p> <p>Verify required SGT subsystem(s) will draw down the secondary containment to <math>\geq 0.20</math> inch of vacuum water gauge in <math>\leq 120</math> seconds.</p>	<p>18 months on a STAGGERED TEST BASIS</p>
<p>SR 3.6.4.1.4 -----NOTE----- The number of SGT subsystem(s) required for this Surveillance is dependent on the secondary containment configuration, and shall be one less than the number required to meet LCO 3.6.4.3, "Standby Gas Treatment (SGT) System," for the given configuration.</p> <p>-----</p> <p>Verify required SGT subsystem(s) can maintain <math>\geq 0.20</math> inch of vacuum water gauge in the secondary containment for 1 hour at a flow rate <math>\leq 4000</math> cfm for each subsystem.</p>	<p>18 months on a STAGGERED TEST BASIS</p>

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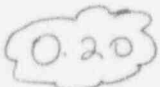
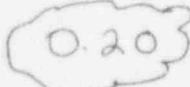
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Enclosure 4

Edwin I. Hatch Nuclear Plant  
Request to Revise Technical Specifications:  
Secondary Containment Draw Down Acceptance Criteria

Bases Changes

BASES

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APPLICABLE  
SAFETY ANALYSES  
(continued)

Secondary containment satisfies Criterion 3 of the NRC Policy Statement (Ref. 4).

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LCO

An OPERABLE secondary containment provides a control volume into which fission products that bypass or leak from primary containment, or are released from the reactor coolant pressure boundary components located in secondary containment, can be diluted and processed prior to release to the environment. For the secondary containment to be considered OPERABLE, it must have adequate leak tightness to ensure that the required vacuum (0.20 inch of vacuum) can be established and maintained. The secondary containment boundary required to be OPERABLE is dependent on the operating status of both units, as well as the configuration of doors, hatches, refueling floor plugs, SCIVs, and available flow paths to SGT Systems. The required boundary encompasses the zones which can be postulated to contain fission products from accidents required to be considered for the condition of each unit, and furthermore, must include zones not isolated from the SGT subsystems being credited for meeting LCO 3.6.4.3. Allowed configurations, associated SGT subsystem requirements, and associated SCIV requirements are detailed in the Technical Requirements Manual (Ref. 3).

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APPLICABILITY

In MODES 1, 2, and 3, a LOCA could lead to a fission product release to primary containment that leaks to secondary containment (the reactor building zone and potentially the refueling floor zone). Therefore, secondary containment OPERABILITY is required during the same operating conditions that require primary containment OPERABILITY.

In MODES 4 and 5, the probability and consequences of the LOCA are reduced due to the pressure and temperature limitations in these MODES. Therefore, maintaining secondary containment OPERABLE is not required in MODE 4 or 5 to ensure a control volume, except for other situations for which significant releases of radioactive material can be postulated, such as during OPDRVs, during CORE ALTERATIONS, or during movement of irradiated fuel assemblies in the secondary containment. (Note, moving irradiated fuel assemblies in the secondary containment may

(continued)

BASES

SURVEILLANCE  
REQUIREMENTS  
(continued)

SR 3.6.4.1.3 and SR 3.6.4.1.4

The Unit 1 and Unit 2 SGT Systems exhausts the secondary containment atmosphere to the environment through appropriate treatment equipment. To ensure that all fission products are treated, SR 3.6.4.1.3 verifies that the appropriate SGT System(s) will rapidly establish and maintain a negative pressure in the secondary containment. This is confirmed by demonstrating that the required SGT subsystem(s) will draw down the secondary containment to  $\geq 0.20$  inch of vacuum water gauge in  $\leq 120$  seconds. This cannot be accomplished if the secondary containment boundary is not intact. SR 3.6.4.1.4 demonstrates that the required SGT subsystem(s) can maintain  $\geq 0.20$  inch of vacuum water gauge for 1 hour at a flow rate  $\leq 4000$  cfm for each SGT subsystem. The 1 hour test period allows secondary containment to be in thermal equilibrium at steady state conditions. Therefore, these two tests are used to ensure secondary containment boundary integrity. Since these SRs are secondary containment tests, they need not be performed with each SGT subsystem. The SGT subsystems are tested on a STAGGERED TEST BASIS, however, to ensure that in addition to the requirements of LCO 3.6.4.3, each SGT subsystem or combination of subsystems will perform this test. The number of SGT subsystems and the required combinations are dependent on the configuration of the secondary containment and are detailed in the Technical Requirements Manual (Ref. 3). The Note to SR 3.6.4.1.3 and SR 3.6.4.1.4 specifies that the number of required SGT subsystems be one less than the number required to meet LCO 3.6.4.3, "Standby Gas Treatment (SGT) System," for the given configuration. Operating experience has shown 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.

REFERENCES

1. FSAR, Section 14.4.3.
2. FSAR, Section 14.4.4.
3. Technical Requirements Manual.
4. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.



BASES

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BACKGROUND  
(continued)

maintained at a negative pressure when the system is in operation, to conservatively ensure zero exfiltration of air from the building when exposed to winds as high as 31 mph.

The demister is provided to remove entrained water in the air, while the electric heater reduces the relative humidity of the airstream to < 70% (Refs. 2 and 3). The prefilter removes large particulate matter, while the HEPA filter removes fine particulate matter and protects the charcoal from fouling. The charcoal adsorbers remove gaseous elemental iodine and organic iodides, and the final HEPA filter collects any carbon fines exhausted from the charcoal adsorber.

The Unit 1 and Unit 2 SGT Systems automatically start and operate in response to actuation signals indicative of conditions or an accident that could require operation of the system. Following initiation, all required charcoal filter train fans start. Upon verification that the required subsystems are operating, the redundant required subsystem is normally shut down.

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APPLICABLE  
SAFETY ANALYSES

The design basis for the Unit 1 and Unit 2 SGT Systems is to mitigate the consequences of a loss of coolant accident and fuel handling accidents (Refs. 2 and 3). For all events analyzed, the SGT Systems are shown to be automatically initiated to reduce, via filtration and adsorption, the radioactive material released to the environment.

The SGT System satisfies Criterion 3 of the NRC Policy Statement (Ref. 5).

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LCO

Following a DBA, a minimum number of SGT subsystems are required to maintain the secondary containment at a negative pressure with respect to the environment and to process gaseous releases. Meeting the LCO requirements for OPERABLE subsystems ensures operation of the minimum number of SGT subsystems in the event of a single active failure. The required number of SGT subsystems is dependent on the

(continued)



BASES

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APPLICABLE  
SAFETY ANALYSIS  
(continued)

Secondary containment satisfies Criterion 3 of the NRC Policy Statement (Ref. 4).

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LCO

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APPLICABILITY

In MODES 1, 2, and 3, a LOCA could lead to a fission product release to primary containment that leaks to secondary containment (the reactor building zone and potentially the refueling floor zone). Therefore, secondary containment OPERABILITY is required during the same operating conditions that require primary containment OPERABILITY.

In MODES 4 and 5, the probability and consequences of the LOCA are reduced due to the pressure and temperature limitations in these MODES. Therefore, maintaining secondary containment OPERABLE is not required in MODE 4 or 5 to ensure a control volume, except for other situations for which significant releases of radioactive material can be postulated, such as during OPDRVs, during CORE ALTERATIONS, or during movement of irradiated fuel assemblies in the secondary containment. (Note, moving irradiated fuel assemblies in the secondary containment may

(continued)

BASES

SURVEILLANCE  
REQUIREMENTS  
(continued)

SR 3.6.4.1.3 and SR 3.6.4.1.4

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REFERENCES

1. FSAR, Section 15.1.39.
2. FSAR, Section 15.1.41.
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BASES

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BACKGROUND  
(continued)

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APPLICABLE  
SAFETY ANALYSES

The design basis for the Unit 1 and Unit 2 SGT Systems is to mitigate the consequences of a loss of coolant accident and fuel handling accidents (Refs. 2, 3, 4, and 5). For all events analyzed, the SGT Systems are shown to be automatically initiated to reduce, via filtration and adsorption, the radioactive material released to the environment.

The SGT System satisfies Criterion 3 of the NRC Policy Statement (Ref. 7).

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LCO

Following a DBA, a minimum number of SGT subsystems are required to maintain the secondary containment at a negative pressure with respect to the environment and to process gaseous releases. Meeting the LCO requirements for OPERABLE subsystems ensures operation of the minimum number of SGT subsystems in the event of a single active failure. The required number of SGT subsystems is dependent on the

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BASES

APPLICABLE  
SAFETY ANALYSES  
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(0.20  
inch of  
vacuum)

APPLICABILITY

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BASES

SURVEILLANCE  
REQUIREMENTS  
(continued)

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negative

0.20

SR 3.6.4.1.4 demonstrates that the required SGT subsystem(s) can maintain  $\geq 0.25$  inch of vacuum water gauge for 1 hour at a flow rate  $\leq 4000$  cfm for each SGT subsystem. The 1 hour test period allows secondary containment to be in thermal equilibrium at steady state conditions. Therefore, these two tests are used to ensure secondary containment boundary integrity. Since these SRs are secondary containment tests, they need not be performed with each SGT subsystem. The SGT subsystems are tested on a STAGGERED TEST BASIS, however, to ensure that in addition to the requirements of LCO 3.6.4.3, each SGT subsystem or combination of subsystems will perform this test. The number of SGT subsystems and the required combinations are dependent on the configuration of the secondary containment and are detailed in the Technical Requirements Manual (Ref. 3). The Note to SR 3.6.4.1.3 and SR 3.6.4.1.4 specifies that the number of required SGT subsystems be one less than the number required to meet LCO 3.6.4.3, "Standby Gas Treatment (SGT) System," for the given configuration. Operating experience has shown 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.

0.20

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BASES

BACKGROUND  
(continued)

conservatively  
maintained at a negative pressure of ~~0.25 inches water gauge~~ when the system is in operation, which represents the ~~internal pressure required~~ to ensure zero exfiltration of air from the building when exposed to ~~a 10 mph~~ winds as high as 31 mph.

The demister is provided to remove entrained water in the air, while the electric heater reduces the relative humidity of the airstream to < 70% (Refs. 2 and 3). The prefilter removes large particulate matter, while the HEPA filter removes fine particulate matter and protects the charcoal from fouling. The charcoal adsorbers remove gaseous elemental iodine and organic iodides, and the final HEPA filter collects any carbon fines exhausted from the charcoal adsorber.

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APPLICABLE  
SAFETY ANALYSES

The design basis for the Unit 1 and Unit 2 SGT Systems is to mitigate the consequences of a loss of coolant accident and fuel handling accidents (Refs. 2 and 3). For all events analyzed, the SGT Systems are shown to be automatically initiated to reduce, via filtration and adsorption, the radioactive material released to the environment.

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LCO

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APPLICABLE  
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(continued)

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(0.20  
inch of  
Vacuum)

APPLICABILITY

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REQUIREMENTS  
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BASES

BACKGROUND  
(continued)

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