

PROPOSED TECHNICAL SPECIFICATION AND BASES CHANGES

- h. Inoperable Fire Detection Instrumentation
- i. Inoperable Fire Suppression Systems
- j. Degraded Auxiliary Electrical Systems, Specification 3.7.2.H.
- k. Inoperable Reactor Vessel Level Monitoring Systems, Table 3.5.1-1
- l. Inoperable Hot Leg Level Measurement Systems, Table 3.5.1-1

## ADMINISTRATIVE CONTROLS

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### SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the Administrator of the Regional Office within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification:

- a. ECCS Actuation, Specifications 3.5.2 and 3.5.3.
- b. Inoperable Seismic Monitoring Instrumentation, Specification 3.3.3.3.
- c. Inoperable Meteorological Monitoring Instrumentation, Specification 3.3.3.4.
- d. Seismic event analysis, Specification 4.3.3.3.2.
- e. Inoperable Fire Detection Instrumentation
- f. Inoperable Fire Suppression Systems
- g. Deleted.
- h. Radioactive Effluents, Specifications 3.11.1.1, 3.11.1.2, 3.11.1.3, 3.11.2.2, 3.11.2.3, 3.11.2.4, 3.11.2.5, and 3.11.3.

This report shall include the following:

- 1) Description of occurrence.
- 2) Identify the cause(s) for exceeding the limit(s)
- 3) Explain corrective action(s) taken to mitigate occurrence.
- 4) Define action(s) taken to prevent recurrence.
- 5) Summary of consequence(s) of occurrence.
- 6) Describe levels exceeding 40CFR190 in accordance with 10CFR20.405(c).
- i. Inoperable Containment Radiation Monitors, Specification 3.3.3.1.
- j. Steam Generator Tubing Surveillance -- Category C-3 results, Specification 4.4.5.5.
- k. Maintenance of Spent Fuel Pool Structural Integrity, Specification 3.7.12.

## INSTRUMENTATION

### BASES

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#### 3/4.3.3.6 POST-ACCIDENT INSTRUMENTATION

The OPERABILITY of the post-accident instrumentation ensures that sufficient information is available on selected plant parameters to monitor and assess these variables following an accident. This capability is consistent with the recommendations of Regulatory Guide 1.97, "Instrumentation for Light-Water-Cooled Nuclear Plants to Assess Plant Conditions During and Following an Accident," December 1975 and NUREG-0578, "TMI-2 Lessons Learned Task Force Status Report and Short Term Recommendations."

The Reactor Vessel Level Monitor is provided as a means of indicating level in the reactor vessel during accident conditions. A minimum of two operable level sensors in the upper plenum region and one operable level sensor in the dome region are required for RVLMS channel operability. When Reactor Coolant Pumps are running, all except the dome sensors are interlocked to read "invalid" due to flow induced variables that may offset the sensor outputs. If the equipment is inaccessible due to health and industrial safety concerns (for example, high radiation area, low oxygen content of the containment atmosphere) or due to physical location of the fault (for example, probe failure in the reactor vessel), then operation may continue until the next scheduled refueling outage and a report filed.

#### 3/4.3.3.7 CHLORINE DETECTION SYSTEMS

The OPERABILITY of the chlorine detection system ensures that sufficient capability is available to promptly detect and initiate protective action in the event of an accidental chlorine release. This capability is required to protect control room personnel and is consistent with the recommendations of Regulatory Guide 1.95, "Protection of Nuclear Power Plant Control Room Operators Against an Accidental Chlorine Release," February 1975.

#### 3/4.3.3.8 FIRE DETECTION INSTRUMENTATION

DELETED

## PLANT SYSTEMS

### BASES

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To provide further assurance of snubber reliability, a representative sample of the installed snubbers will be functionally tested during plant shutdowns at 18 month intervals. These tests will include stroking of the snubbers to verify proper piston movement, lock-up and bleed. Observed failures of these sample snubbers will require functional testing of additional units. To minimize personnel exposures, snubbers installed in areas which have high radiation fields during shutdown or in especially difficult to remove locations may be exempted from these functional testing requirements provided the OPERABILITY of these snubbers was demonstrated during functional testing at either the completion of their fabrication or at a subsequent date.

#### 3/4.7.9 SEALED SOURCE CONTAMINATION

The limitations on removable contamination for sources requiring leak testing, including alpha emitters, is based on 10 CFR 70.39(c) limits for plutonium. This limitation will ensure that leakage from byproduct, source, and special nuclear material sources will not exceed allowable intake values.

#### 3/4.7.10 FIRE SUPPRESSION SYSTEMS

DELETED

## PLANT SYSTEMS

### BASES

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#### 3/4.7.11 FIRE BARRIERS

DELETED

#### 3/4.7.12 SPENT FUEL POOL STRUCTURAL INTEGRITY

The reinforcing steel in the walls of the spent fuel pool was erroneously terminated into the front face instead of the rear face of the adjoining walls during construction of the spent fuel pool. Therefore, the specified structural integrity inspections of the spent fuel pool are required to be performed to ensure that the pool remains safe for use and that it will adequately resist the imposed loadings. If no abnormal degradation is observed during the first five inspections, the inspection interval for subsequent routine inspections may be extended to at least once per 18 months or longer if justified by observed performance of the pool.