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## 5.0 ADMINISTRATIVE CONTROLS

### 5.14 Systems Integrity

A program to reduce leakage from systems outside containment that would or could contain highly radioactive fluids during a serious transient or accident to as low as practical levels shall be implemented. This program shall include the following:

1. Provisions establishing preventive maintenance and periodic visual inspection requirements, and
2. Integrated leak test requirements for each system at a frequency not to exceed refueling cycle intervals.

### 5.15 Post-Accident Radiological Sampling and Monitoring

The following programs shall be implemented and maintained to ensure the capability to accurately monitor and/or sample and analyze radiological effluents and concentrations in a post-accident condition:

1. A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. (Any space which will require occupancy to permit an operator to aid in mitigation of, or recovery from, an accident is designated as vital.)
2. A program which will ensure the capability to obtain and analyze radioactive iodines and particulates in plant gaseous effluents.
3. A program which will ensure the capability to obtain and analyze a reactor coolant liquid sample under accident conditions.
4. A program which will ensure the capability to obtain and analyze a containment atmosphere sample under accident conditions.

These programs shall include the following:

1. Training of personnel.
2. Procedures for monitoring and/or sampling and analysis.
3. Provisions for maintenance of sampling and analysis equipment.

DISCUSSION, JUSTIFICATION, AND  
SIGNIFICANT HAZARDS CONSIDERATIONS

The proposed Technical Specifications will establish administrative controls for implementation of a program to ensure that the Post Accident Sampling System can obtain and analyze samples in accordance with NUREG-0737, Section II.B.3.

In addition, Sections 5.15 and 5.16 of the Technical Specifications concerning the administrative controls for Iodine Monitoring and Sampling and Analysis of Plant Effluents shall be revised. These sections shall be deleted as individual section headings and shall be grouped under the heading of Post Accident Radiological Sampling and Monitoring. The programs outlined for the Iodine Monitoring and Sampling and Analysis of Plant Effluents will be grouped under this heading and shall remain consistent with the requirements listed in NUREG-0737. A state-ment has been added to the program for Iodine Monitoring. The definition of vital area, as used in the context of NUREG-0578 and 0737, has been added. The intent of the specification does not change.

This section shall also include programs which are required to ensure that the capability exists to obtain and analyze reactor coolant and containment atmosphere samples. Thus the new heading shall cover programs for obtaining and analyzing reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions.

These proposed Technical Specification changes are consistent with those provided in Enclosure 3 of NRC Generic Letter No. 83-37.

No Significant Hazards Considerations include:

1. This proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. The subject systems were designed and installed to mitigate the consequences of a postulated accident. The proposed changes to the Technical Specifications merely require actions which will ensure these systems are capable of performing their intended functions. These proposed changes do not alter the design, surveillance requirements, or operability requirements of any system presently addressed in the existing Technical Specifications.
2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed changes are intended to provide assurance that the above referenced systems are capable of performing their intended functions. Therefore, the changes are conservative in nature and will not create the possibility of an unanalyzed accident.
3. The proposed amendment does not involve a reduction in a margin of safety. As mentioned previously, the proposed changes merely assure that newly installed systems perform their intended functions. The change does not alter the design, operability requirements, or surveillance requirements of any other plant system.