

Attachment 4 to GNRO-96/00051

Marked-up Pages To The GGNS Operating License

9605140305 960508  
PDR ADOCK 05000416  
P PDR

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.6.1.3.3 -----NOTES-----</p> <ol style="list-style-type: none"> <li>1. Valves and blind flanges in high radiation areas may be verified by use of administrative means.</li> <li>2. Not required to be met for PCIVs that are open under administrative controls.</li> </ol> <p>-----</p> <p>Verify each primary containment isolation manual valve and blind flange that is located inside primary containment, drywell, or steam tunnel and is required to be closed during accident conditions is closed.</p>	<p>Prior to entering MODE 2 or 3 from MODE 4, if not performed within the previous 92 days</p>
<p>SR 3.6.1.3.4 Verify the isolation time of each power operated and each automatic PCIV, except MSIVs, is within limits.</p>	<p>In accordance with the Inservice Testing Program</p>
<p>SR 3.6.1.3.5 -----NOTE-----</p> <p>Only required to be met in MODES 1, 2, and 3.</p> <p>-----</p> <p>Perform leakage rate testing for each primary containment purge valve with resilient seals.</p>	<p>184 days</p> <p>AND</p> <p>Once within 92 days after opening the valve</p> <div data-bbox="1372 1347 1567 1476" style="border: 1px solid black; padding: 5px; display: inline-block;">             Insert 3.6-13A           </div>

(continued)

BASES \*

ACTIONS

D.1, D.2, and D.3 (continued)

verification that those isolation devices outside primary containment and potentially capable of being mispositioned are in the correct position. For the isolation devices inside primary containment, the time period specified as "prior to entering MODE 2 or 3, from MODE 4 if not performed within the previous 92 days" is based on engineering judgment and is considered reasonable in view of administrative controls that will ensure that isolation device misalignment is an unlikely possibility.

For the primary containment purge valve with resilient seal that is isolated in accordance with Required Action D.1, SR 3.6.1.3.5 must be performed at least once every 92 days. This provides assurance that degradation of the resilient seal is detected and confirms that the leakage rate of the primary containment purge valve does not increase during the time the penetration is isolated. The normal Frequency for SR 3.6.1.3.5 is 184 days. Since more reliance is placed on a single valve while in this Condition, it is prudent to perform the SR more often. Therefore, a Frequency of once per 92 days was chosen and has been shown acceptable based on operating experience.

E.1 and E.2

If any Required Action and associated Completion Time cannot be met in MODE 1, 2, or 3, 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.

F.1, G.1, H.1, and H.2

If any Required Action and associated Completion Time cannot be met, the plant must be placed in a condition in which the LCO does not apply. If applicable, CORE ALTERATIONS and movement of irradiated fuel assemblies in the primary and

(continued)

BASE9

SURVEILLANCE  
REQUIREMENTS

SR 3.6.1.3.5 (continued)

For primary containment purge valves with resilient seals, additional leakage rate testing beyond the test requirements of 10 CFR 50, Appendix J (Ref. 3), is required to ensure OPERABILITY. Operating experience has demonstrated that this type of seal has the potential to degrade in a shorter time period than do other seal types. Based on this observation, and the importance of maintaining this penetration leak tight (due to the direct path between primary containment and the environment), a Frequency of 184 days was established. Additionally, this SR must be performed within 92 days after opening the valve. The 92 day Frequency was chosen recognizing that cycling the valve could introduce additional seal degradation (beyond that which occurs to a valve that has not been opened). Thus, decreasing the interval (from 184 days) is a prudent measure after a valve has been opened.

The SR is modified by a Note stating that the primary containment purge valves are only required to meet leakage rate testing requirements in MODES 1, 2, and 3. If a LOCA inside primary containment occurs in these MODES, purge valve leakage must be minimized to ensure offsite radiological release is within limits. At other times when the purge valves are required to be capable of closing (e.g., during handling of irradiated fuel), pressurization concerns are not present and the purge valves are not required to meet any specific leakage criteria.

SR 3.6.1.3.6

Insert B 3.6-24A

Verifying that the full closure isolation time of each MSIV is within the specified limits is required to demonstrate OPERABILITY. The full closure isolation time test ensures that the MSIV will isolate in a time period that does not exceed the times assumed in the DBA analyses. The 3 second time limit is measured from the start of valve motion to complete valve closure. The 5 second time limit is measured from initiation of the actuating signal to complete valve closure. The Frequency of this SR is in accordance with the Inservice Testing Program.

(continued)

**Insert 3.6-15A**

-----note-----  
SR 3.0.2 is not applicable  
-----

In accordance with 10 CFR 50, Appendix J, as modified by approved exemptions

**Insert B 3.6-24A**

The frequency is required by 10 CFR 50, Appendix J, as modified by approved exemptions.  
Thus, SR 3.0.2 (Which allows frequency extensions) does not apply.