

PROPOSED TECHNICAL SPECIFICATION CHANGES

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ANO-1

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- 3.5.1.7 The Decay Heat Removal System isolation valve closure setpoints shall be equal to or less than 340 psig for one valve and equal to or less than 400 psig for the second valve in the suction line. The relief valve setting for the DHR system shall be equal to or less than 450 psig.
- 3.5.1.8 The degraded voltage monitoring relay settings shall be as follows:
- a. The 4.16 KV emergency bus undervoltage relay setpoints shall be >3115 VAC but <3177 VAC.
 - b. The 460 V emergency bus undervoltage relay setpoints shall be >423 VAC but <431 VAC with a time delay setpoint of 8 seconds ± 1 second.
- 3.5.1.9 The following Reactor Trip circuitry shall be operable as indicated:
1. Reactor trip upon loss of Main Feedwater shall be operable (as determined by Specification 4.1.a and item 35 of Table 4.1-1) at greater than 5% reactor power. (May be bypassed up to 10% reactor power.)
 2. Reactor trip upon Turbine Trip shall be operable (as determined by Specification 4.1.a and item 41 of Table 4.1-1) at greater than 5% reactor power. (May be bypassed up to 45% reactor power.)
 3. If the requirements of Specifications 3.5.1.9.1 or 3.5.1.9.2 cannot be met, restore the inoperable trip within 12 hours or bring the plant to a hot shutdown condition.
- 3.5.1.10 Two control room ventilation chlorine detection systems shall be operable and capable of actuating control room isolation and emergency ventilation systems, with alarm/trip setpoints adjusted to actuate at a chlorine concentration of ≤ 5 ppm whenever the reactor coolant system is above the cold shutdown condition.
- 3.5.1.11 For on-line testing of the Emergency Feedwater Initiation and Control (EFIC) system channels during power operation only one channel shall be locked into "maintenance bypass" at any one time. If one channel of the NI/RPS is in maintenance bypass, only the corresponding channel of EFIC may be bypassed.
- 3.5.1.12 The Containment High Range Radiation Monitoring instrumentation shall be operable with a minimum measurement range from 1 to 10 R/hr.

- 3.5.1.13 The Seismic Monitoring Instrumentation shall be operable with a minimum measurement range of 0.01 - 1.0 g for Triaxial Time - History Accelerographs, 0.05 - 1.0 g for Triaxial Peak Accelerographs, and 2-25.4 Hz for Triaxial Response Spectrum Recorders.
- 3.5.1.14 The Main Steam Line Radiation Monitoring Instrumentation shall be operable with a minimum measurement range from 10^{-1} to 10^4 mR/hr, whenever the reactor is above the cold shutdown condition.
- 3.5.1.15 Initiate functions of the EFIC system which are bypassed at cold shutdown conditions shall have the following minimum operability conditions:
- a. "low steam generator pressure" initiate shall be operable when the main steam pressure exceeds 750 psig.
 - b. "loss of 4 RC pumps" initiate shall be operable when neutron flux exceeds 10% power.
 - c. "main feedwater pumps tripped" initiate shall be operable when neutron flux exceeds 10% power.
- 3.5.1.16 The automatic steam generator isolation system within EFIC shall be operable when main steam pressure is greater than 750 psig.
- 3.5.1.17 Two control room ventilation radiation monitoring channels shall be operable whenever the reactor coolant system is above the cold shutdown condition or during handling of irradiated fuel.

The OPERABILITY of the Seismic Monitoring Instrumentation ensures that sufficient capability is available to promptly determine the magnitude of a seismic event and evaluate the response of those features important to safety. This capability is required to permit comparison of the measured response to that used in the design basis for the facility to determine if plant shutdown is required pursuant to Appendix "A" of 10CFR Part 100. The instrumentation is consistent with the recommendations of Safety Guide 12, "Instrumentation for Earthquake," published March 19, 1971, and NUREG-0800 Section 3.7.4, "Seismic Instrumentation."

To support loss of main feedwater analyses, steam line/feedwater line break analyses, SBLOCA analyses, and NUREG-0737 requirements, the EFIC system is designed to automatically initiate EFW when:

1. all four RC pumps are tripped
2. both main feedwater pumps are tripped
3. the level of either steam generator is low
4. either steam generator pressure is low
5. ESAS ECCS actuation (high RB pressure or low RCS pressure)

The EFIC system is also designed to isolate the affected steam generator on a steam line/feedwater line break and supply EFW to the intact generator according to the following logic:

- If both SG's are above 600 psig, supply EFW to both SG's.
- If one SG is below 600 psig, supply EFW to the other SG.
- If both SG's are below 600 psig, but the pressure difference between the two SG's exceeds 100 psig, supply EFW only to the SG with the higher pressure.
- If both SG's are below 600 psig and the pressure difference is less than 100 psig, supply EFW to both SG's.

At cold shutdown conditions all EFIC initiate and isolate functions are bypassed except low steam generator level initiate. The bypassed functions will be automatically reset at the values or plant conditions identified in Specification 3.5.1.15. "Loss of 4 RC pumps" initiate and "low steam generator pressure" initiate are the only shutdown bypasses to be manually initiated during cooldown. If reset is not done manually, they will automatically reset. Main feedwater pump trip bypass is automatically removed above 10% power.

The principal function of the Control Room Isolation-High Radiation is to provide an enclosed environment from which the unit can be operated following an uncontrolled release of radioactivity. Due to the unique arrangement of the shared control room envelope, one control room isolation channel receives a high radiation signal from the ANO-1 control room area radiation monitor and the redundant channel receives a high radiation signal from the ANO-2 control room ventilation process monitor. With no channel of the control room radiation monitoring system operable, the CREVS must be placed in a condition that does not require the isolation to occur (i.e., one operable train of CREVS is placed in the emergency recirculation mode of operation. Reactor operation may continue indefinitely in this state.

REFERENCE

FSAR, Section 7.1
FSAR, Section 2.7.6

Table 3.5.1-1 (cont'd)

OTHER SAFETY RELATED SYSTEMS

| (Cont'd) | 1 | 2 | 3 | 4 | 5 |
|---|-----------------|---------------------------------|------------------------|---------------------------|--|
| Functional Unit | No. of channels | No. of channels for system trip | Min. operable channels | Min. degree of redundancy | Operator action if conditions of column 3 or 4 cannot be met |
| c. Triaxial Response-Spectrum Recorders | | | | | |
| 1. 2XR-8350, Unit 2 Containment Base Slab, Elev. 335' 6" O/S Containment) | 1 | N/A | 1 | 0 | Note 27 |
| 15. Reactor Vessel Level Monitoring System | 2 | N/A | 2 | 0 | Note 28, 29 |
| 16. Hot Leg Level Measurement System (HLLMS) | 2 | N/A | 2 | 0 | Note 28, 29 |
| 17. Main Steam Line Radiation Monitors | 1 /steam line | N/A | 1/steam line | 0 | Note 30 |
| 18. Control Room Radiation Monitors | 2 | 1 | 2 | 1 | Note 17, 18 |

TABLE 3.5.1-1 (Cont'd)

12. With the number of operable channels less than required, either return the indicator to operable status within 24 hours, or verify the block valve closed and power removed within an additional 24 hours. If the block valve cannot be verified closed within the additional 24 hours, de-energize the electromatic relief valve power supply within the following 12 hours.
13. Channels may be bypassed for not greater than 30 seconds during reactor coolant pump starts. If the automatic bypass circuit or its alarm circuit is inoperable, the undervoltage protection shall be restored within 1 hour, otherwise, Note 14 applies.
14. With the number of channels less than required, restore the inoperable channels to operable status within 72 hours or be in HOT SHUTDOWN within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
15. This trip function may be bypassed at up to 10% reactor power.
16. This trip function may be bypassed at up to 45% reactor power.
17. With no channel operable, within 1 hour initiate and maintain operation of the control room emergency ventilation system in the recirculation mode of operation.
18. With one channel inoperable, restore the inoperable channel to operable status within 7 days or within the next 6 hours initiate and maintain operation of the control room emergency ventilation system in the recirculation mode of operation.
19. This function may be bypassed below 750 psig OTSG pressure. Bypass is automatically removed when pressure exceeds 750 psig.
20. With one channel inoperable, (1) either restore the inoperable channel to operable status within 7 days, or (2) prepare and submit a Special Report to the Commission pursuant to Specification 6.12.5 within 30 days following the event, outlining the action taken, the cause of the inoperability, and the plans and schedule for restoring the system to operable status. With both channels inoperable, initiate alternate methods of monitoring the containment radiation level within 72 hours in addition to the actions described above.
21. With one channel inoperable, restore the inoperable channel to operable status within 30 days or be in hot shutdown within 72 hours unless containment entry is required. If containment entry is required, the inoperable channel must be restored by the next refueling outage. If both channels are inoperable, restore the inoperable channels within 30 days or be in HOT SHUTDOWN within 12 hours.

- 3.8.15 Storage in the spent fuel pool shall be restricted to fuel assemblies having initial enrichment less than or equal to 4.1 w/o U-235. The provisions of Specification 3.0.3 are not applicable.
- 3.8.16 Storage in Region 2 (as shown on Figure 3.8.1) of the spent fuel pool shall be further restricted by burnup and enrichment limits specified in Figure 3.8.2. In the event a checkerboard storage configuration is deemed necessary for a portion of Region 2, vacant spaces adjacent to the faces of any fuel assembly which does not meet the Region 2 burnup criteria (non-restricted) shall be physically blocked before any such fuel assembly may be placed in Region 2. This will prevent inadvertent fuel assembly insertion into two adjacent storage locations. The provisions of Specification 3.0.3 are not applicable.
- 3.8.17 The boron concentration in the spent fuel pool shall be maintained (at all times) at greater than 1600 parts per million.
- 3.8.18 During the handling of irradiated fuel, the control room emergency air conditioning system and the control room emergency ventilation system shall be operable as required by Specification 3.9.

Bases

Detailed written procedures will be available for use by refueling personnel. These procedures, the above specifications, and the design of the fuel handling equipment as described in Section 9.6 of the FSAR incorporating built-in interlocks and safety features, provide assurance that no incident could occur during the refueling operations that would result in a hazard to public health and safety. If no change is being made in core geometry, one flux monitor is sufficient. This permits maintenance on the instrumentation. Continuous monitoring of radiation levels and neutron flux provides immediate indication of an unsafe condition.

The requirement that at least one decay heat removal loop be in operation ensures that (1) sufficient cooling capacity is available to remove decay heat and maintain the water in the reactor pressure vessel at the refueling temperature (normally 140°F), and (2) sufficient coolant circulation is maintained through the reactor core to minimize the effects of a boron dilution incident and prevent boron stratification.⁽¹⁾

The requirement to have two decay heat removal loops operable when there is less than 23 feet of water above the core, ensures that a single failure of the operating decay heat removal loop will not result in a complete loss of decay heat removal capability. With the reactor vessel head removed and 23 feet of water above the core, a large heat sink is available for core cooling, thus in the event of a failure of the operating decay heat removal loop, adequate time is provided to initiate emergency procedures to cool the core.

The shutdown margin indicated in Specification 3.8.4 will keep the core subcritical, even with all control rods withdrawn from the core.⁽²⁾ Although the refueling boron concentration is sufficient to maintain the core $k_{eff} \leq 0.99$ if all the control rods were removed from the core, only a few control rods will be removed at any one time during fuel shuffling and

3.9 CONTROL ROOM EMERGENCY VENTILATION AND AIR CONDITIONING SYSTEMS

Applicability

Applies to the operability of the control room emergency ventilation and air conditioning systems.

Objective

To ensure that the control room emergency ventilation and air conditioning systems will perform within acceptable levels of efficiency and reliability.

Specification

3.9.1 Control Room Emergency Air Conditioning System

3.9.1.1 Two independent trains of the control room emergency air conditioning system shall be operable whenever the reactor coolant system is above the cold shutdown condition or during handling of irradiated fuel.

3.9.1.2 With one control room emergency air conditioning system inoperable, restore the inoperable system to Operable status within 30 days or be in at least Hot Shutdown within the next 6 hours and in Cold Shutdown within the following 30 hours.

3.9.2 Control Room Emergency Ventilation System

3.9.2.1 Two independent trains of the control room emergency ventilation system shall be operable whenever the reactor coolant system is above the cold shutdown condition or during handling of irradiated fuel.

3.9.2.2 With one control room emergency ventilation system inoperable, restore the inoperable system to Operable status within 7 days or be in at least Hot Shutdown within the next 6 hours and in Cold Shutdown within the following 30 hours.

Bases

The control room emergency ventilation and air conditioning system is designed to isolate the combined control rooms to ensure that the control rooms will remain habitable for Operations personnel during and following all credible accident conditions and to ensure that the ambient air temperature does not exceed the allowable temperature for continuous duty rating for the equipment and instrumentation cooled by this system. The design configuration of the system is based on limiting the radiation exposure to personnel occupying the control room to 5 REM or less whole body, or its equivalent, in accordance with the requirements of General Design Criteria 19 of Appendix A, 10CFR 50.

Unit 1 and Unit 2 control rooms are a single environment for emergency ventilation and air conditioning concerns. Since the control room emergency ventilation and air conditioning equipment is shared between units, the plant status of both units must be considered when determining applicability of the specification.

Due to the unique situation of the shared emergency ventilation and air conditioning equipment, the components may be cross fed from the opposite unit per predetermined contingency actions/procedures. During modes when the emergency control room ventilation and emergency air conditioning is not required on Unit 2, Unit 1 may take credit for operability of these systems when configured to achieve separation and independence regardless of normal power and/or service water configuration. This will be in accordance with predetermined contingency actions/procedures.

The control room emergency ventilation system consists of two independent filter and fan trains, two independent actuation channels per Unit and the Control Room isolation dampers. The control room dampers isolate the control room within 10 seconds of receipt of a high radiation signal.

If the actuation signal can not start the emergency ventilation recirculation fan, operating the affected fan in the manual recirculation mode and isolating the control room isolation dampers provides the required design function of the control room emergency ventilation system to isolate the combined control rooms to ensure that the control rooms will remain habitable for operations personnel during and following accident conditions. This contingency action should be put in place immediately (within 1 hour) to fully satisfy the design functions of the control room emergency ventilation system.

The control room emergency air conditioning system (CREACS) provides temperature control for the control room following isolation of the control room. It is manually started from Unit Two Control Room. The CREACS consists of two independent and redundant trains that provide cooling of recirculated control room air. A cooling coil and a water cooled condensing unit are provided for each system to provide suitable temperature conditions in the control room for operating personnel and safety related control equipment.

With both trains of the control room emergency ventilation and/or emergency air conditioning inoperable, the function of the control room emergency air systems have been lost, requiring immediate action to place the reactor in a condition where the specification does not apply.

Table 4.1-1 (Cont.)

| <u>Channel Description</u> | <u>Check</u> | <u>Test</u> | <u>Calibrate</u> | <u>Remarks</u> |
|--|--------------|-------------|------------------|----------------|
| 47. RCS Subcooling Margin Monitor | D | NA | R | |
| 48. Electromatic Relief Valve Flow Monitor | D | NA | R | |
| 49. Electromatic Relief Block Valve Position Indicator | D | NA | R | |
| 50. Pressurizer Safety Valve Flow Monitor | D | NA | R | |
| 51. Pressurizer Water Level Indicator | D | NA | R | |
| 52. Control Room Chlorine Detector | S | M | R | |
| 53. EFW Initiation | | | | |
| a. Manual | NA | M | NA | |
| b. SG Low Level, SGA or B | S | M | R | |
| c. Low Pressure SGA or B | S | M | R | |
| d. Loss of both MFW Pumps and PWR > 10% | S | M | R | |

4.10 CONTROL ROOM EMERGENCY VENTILATION AND AIR CONDITIONING SYSTEM SURVEILLANCE

Applicability

Applies to the surveillance of the control room emergency ventilation and air conditioning systems.

Objective

To verify an acceptable level of efficiency and operability of the control room emergency ventilation and air conditioning systems.

Specification

- 4.10.1 Each train of control room emergency air conditioning shall be demonstrated Operable:
- a. At least once per 31 days on a STAGGERED TEST BASIS by:
 1. Starting each unit and
 2. Verifying that each unit operates for at least 1 hour and maintains the control room air temperature $\leq 84^{\circ}\text{F}$ D.B.
 - b. At least once per 18 months by verifying a system flow rate of 9900 cfm $\pm 10\%$.
- 4.10.2 Each Control Room Emergency Ventilation System shall be demonstrated Operable:
- a. At least once per 31 days on a Staggered Test Basis by initiating, from the Control Room, flow through the HEPA filters and charcoal adsorbers and verifying that the system operates for at least 15 minutes.
 - b. At least once per 18 months or 1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or 2) following significant painting, fire, or chemical release in any ventilation zone communicating with the system by:
 1. Verifying that the cleanup system satisfies the in-place testing acceptance criteria and uses the test procedures of Regulatory Positions C.5.a, C.5.c, and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 2000 cfm $\pm 10\%$.
 2. Verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of ASTM D3803-1989 when tested at 30°C and 95% relative humidity for a methyl iodide penetration of:
 - a. $\leq 2.5\%$ for 2 inch charcoal adsorber beds, or
 - b. $\leq 0.5\%$ for 4 inch charcoal adsorber beds.
 3. Verifying a system flow rate of 2000 cfm $\pm 10\%$ during system operation when tested in accordance with ANSI N510-1975.

- c. After every 720 hours of charcoal adsorber operation by verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of ASTM D3803-1989 when tested at 30°C and 95% relative humidity for a methyl iodide penetration of:
 - a. $\leq 2.5\%$ for 2 inch charcoal adsorber beds, or
 - b. $\leq 0.5\%$ for 4 inch charcoal adsorber beds.
- d. At least once per 18 months by:
 - 1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is < 6 inches of water while operating at a flowrate of 2000 cfm $\pm 10\%$.
 - 2. Verifying that on a Control Room high radiation test signal, the system automatically isolates the Control Room within 10 seconds and switches into a recirculation mode of operation with flow through the HEPA filters and charcoal adsorber banks.
- e. After each complete or partial replacement of the HEPA filter bank by verifying that the HEPA filter banks remove $\geq 99.95\%$ of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 2000 cfm $\pm 10\%$.
- f. After each complete or partial replacement of a charcoal adsorber bank by verifying that the charcoal adsorbers remove $\geq 99.95\%$ of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 2000 cfm $\pm 10\%$.

Bases

The purpose of the control room emergency ventilation system is to limit the particulate and gaseous fission products to which the control area would be subjected during an accidental radioactive release in or near the Auxiliary Building. The system is designed with 100 percent capacity filter trains which consist of a prefilter, high efficiency particulate filters, charcoal adsorbers and a fan.

Since the emergency ventilation system is not normally operated, a periodic test is required to insure operability when needed. During this test the system will be inspected for such things as water, oil, or other foreign material; gasket deterioration, adhesive deterioration in the HEPA units; and unusual or excessive noise or vibration when the fan motor is running. Pressure drop across the combined HEPA filters and charcoal adsorbers of less than 6 inches of water at the system design flow rate will indicate that the filters and adsorbers are not clogged by excessive amounts of foreign matter. Pressure drop should be determined at least once per operating cycle to show system performance capability.

The frequency of tests and sample analysis are necessary to show that the HEPA filters and charcoal adsorbers can perform as evaluated. The charcoal adsorber efficiency test procedures should allow for obtaining at least two samples. Each sample should be at least two inches in diameter and a length equal to the thickness of the bed. Tests of the charcoal adsorbers with DOP aerosol shall be performed in accordance with ANSI N510 (1975) "Standard for Testing of Nuclear Air Cleaning Systems." Any HEPA filters found defective shall be replaced with filters qualified according to Regulatory Position C.3.d of Regulatory Guide 1.52. If laboratory test results are unacceptable, all charcoal adsorbents in the system shall be replaced with charcoal adsorbent qualified according to Regulatory Guide 1.52.

The operability of the control room emergency air conditioning Systems ensure that the ambient air temperature does not exceed the allowable temperature for the equipment and instrumentation cooled by this system and the Control Room will remain habitable for Operations personnel during and following all credible accident conditions.

Operation of the systems for 15 minutes every month will demonstrate operability of the emergency ventilation and emergency air conditioning systems. All dampers and other mechanical and Isolation systems will be shown to be operable.

If significant painting, fire or chemical release occurs such that the HEPA filter or charcoal adsorber could become contaminated from the fumes, chemicals or foreign material, the same tests and sample analysis shall be performed as required for operational use. The determination of significant shall be made by the operator on duty at the time of the incident. Knowledgeable staff members should be consulted prior to making this determination.

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LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE

REQUIREMENTS

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TABLE 3.3-6

RADIATION MONITORING INSTRUMENTATION

| <u>INSTRUMENT</u> | <u>MINIMUM CHANNELS OPERABLE</u> | <u>APPLICABLE MODES</u> | <u>ALARM/TRIP SETPOINT</u> | <u>MEASUREMENT RANGE</u> | <u>ACTION</u> |
|--|--|-----------------------------|--------------------------------|------------------------------|---------------|
| 1. AREA MONITORS | | | | | |
| a. Spent Fuel Pool Area Monitor | 1 | Note 1 | $\leq 1.5 \times 10^{-2}$ R/hr | $10^{-4} - 10^1$ R/hr | 13 |
| b. Containment High Range | 2 | 1, 2, 3 & 4 | Not Applicable | $1 - 10^7$ R/hr | 18 |
| 2. PROCESS MONITORS | | | | | |
| a. Containment | | | | | |
| i. Gaseous Activity | | | | | |
| a) Purge & Exhaust Isolation | 1 | 5 & 6 | $\leq 2 \times$ background | $10 - 10^6$ cpm | 16 |
| b) RCS Leakage Detection | 1 | 1, 2, 3 & 4 | Not Applicable | $10 - 10^6$ cpm | 14 |
| ii. Particulate Activity | | | | | |
| a) RCS Leakage Detection | 1 | 1, 2, 3 & 4 | Not Applicable | $10 - 10^6$ cpm | 14 |
| b. Control Room Ventilation Radiation Monitors | 2 | Note 2 | | | 17, 20 |
| i. Unit 1 Area Monitor Channel | | | ≤ 7 mR/hr | $10^{-1} - 10^4$ mR/hr | |
| ii. Unit 2 Ventilation Intake Duct Monitor Channel | | | $\leq 2 \times$ background | $10 - 10^6$ cpm | |
| c. Main Steam Line Radiation Monitors | 1/Steam Line | 1, 2, 3, & 4 | Not Applicable | $10^{-1} - 10^4$ mR/hr | 19 |

Note 1 - With fuel in the spent fuel pool or building

Note 2 - MODES 1, 2, 3, 4, and during handling of irradiated fuel

TABLE 3.3-6 (Continued)

TABLE NOTATION

- ACTION 13 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, perform area surveys of the monitored area with portable monitoring instrumentation at least once per 24 hours.
- ACTION 14 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, comply with the ACTION requirements of Specification 3.4.6.1.
- ACTION 16 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, complete the following:
- a. If performing CORE ALTERATIONS or moving irradiated fuel within the reactor building, secure the containment purge system or suspend CORE ALTERATIONS and movement of irradiated fuel within the reactor building.
 - b. If a containment PURGE is in progress, secure the containment purge system.
 - c. If continuously ventilating, verify the SPING monitor operable or perform the ACTIONS of 3.3.3.9, or secure the containment purge system.
- ACTION 17 - With no channels OPERABLE, within 1 hour initiate and maintain operation of the control room emergency ventilation system in the recirculation mode of operation.
- ACTION 18 - With the number of channels OPERABLE one less than required by the Minimum Channels OPERABLE requirement, (1) either restore the inoperable channel to OPERABLE status within 7 days or (2) prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within 30 days following the event, outlining the action taken, the cause of the inoperability, and the plans and schedule for restoring the system to OPERABLE status. With both channels inoperable, initiate alternate methods of monitoring the containment radiation level within 72 hours in addition to the actions described above.
- ACTION 19 - With the number of OPERABLE Channels less than required by the Minimum Channels OPERABLE requirements, initiate the preplanned alternate method of monitoring the appropriate parameter(s), within 72 hours, and:
- 1) either restore the inoperable Channel(s) to OPERABLE status within 7 days of the event, or
 - 2) prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within 14 days following the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.
- ACTION 20 - With the number of channels OPERABLE one less than required by the Minimum Channels OPERABLE requirement, restore the inoperable channel to OPERABLE status within 7 days, or within the next 6 hours initiate and maintain the control room emergency ventilation system in the recirculation mode of operation.

TABLE 4.3-3

RADIATION MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

| <u>INSTRUMENT</u> | <u>CHANNEL CHECK</u> | <u>CHANNEL CALIBRATION</u> | <u>CHANNEL FUNCTIONAL TEST</u> | <u>MODES IN WHICH SURVEILLANCE REQUIRED</u> |
|--|--------------------------|--------------------------------|--|---|
| 1. AREA MONITORS | | | | |
| a. Spent Fuel Pool Area Monitor | S | R | M | Note 1 |
| b. Containment High Range | S | R Note 4 | M | 1, 2, 3, & 4 |
| 2. PROCESS MONITORS | | | | |
| a. Containment | | | | |
| i. Gaseous Activity | | | | |
| a) Purge & Exhaust Isolation | Note 2 | R | Note 3 | 5 & 6 |
| b) RCS Leakage Detection | S | R | M | 1, 2, 3, & 4 |
| ii. Particulate Activity | | | | |
| a) RCS Leakage Detection | S | R | M | 1, 2, 3, & 4 |
| b. Control Room Ventilation Radiation Monitors | S | R | M | Note 5 |
| c. Main Steam Line Radiation Monitors | S | R | M | 1, 2, 3, & 4 |

Note 1 - With fuel in the spent fuel pool or building.

Note 2 - Within 8 hours prior to initiating containment purge operations and at least once per 12 hours during containment purge operations.

Note 3 - Within 31 days prior to initiating containment purge operations and at least once per 31 days during containment purge operations.

Note 4 - Acceptable criteria for calibration are provided in Table II.F.1-3 of NUREG-0737.

Note 5 - MODES 1, 2, 3, 4, and during handling of irradiated fuel.

PLANT SYSTEMS

3/4.7.6 CONTROL ROOM EMERGENCY VENTILATION AND AIR CONDITIONING SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.6.1 Two independent control room emergency ventilation and air conditioning systems shall be OPERABLE.

APPLICABILITY: MODES 1,2,3, 4, and during handling of irradiated fuel.

ACTION:

- a. With one control room emergency air conditioning system inoperable, restore the inoperable system to OPERABLE status within 30 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With one control room emergency ventilation system inoperable, restore the inoperable system to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.7.6.1.1 Each control room emergency air conditioning system shall be demonstrated OPERABLE:

- a. At least once per 31 days on a STAGGERED TEST BASIS by:
 1. Starting each unit from the control room, and
 2. Verifying that each unit operates for at least 1 hour and maintains the control room air temperature $\leq 84^{\circ}\text{F}$ D.B.
- b. At least once per 18 months by verifying a system flow rate of 9900 cfm $\pm 10\%$.

4.7.6.1.2 Each control room emergency air filtration system shall be demonstrated OPERABLE:

- a. At least once per 31 days on a STAGGERED TEST BASIS by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the system operates for at least 15 minutes.
- b. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the system by:

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

1. Verifying that the cleanup system satisfies the in-place testing acceptance criteria and uses the test procedures of Regulatory Positions C.5.a, C.5.c and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 2000 cfm $\pm 10\%$.
2. Verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of ASTM D3803-1989 when tested at 30°C and 95% relative humidity for a methyl iodide penetration of:
 - a. $\leq 2.5\%$ for 2 inch charcoal adsorber beds, or
 - b. $\leq 0.5\%$ for 4 inch charcoal adsorber beds.
3. Verifying a system flow rate of 2000 cfm $\pm 10\%$ during system operation when tested in accordance with ANSI N510-1975.
- c. After every 720 hours of charcoal adsorber operation by verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of ASTM D3803-1989 when tested at 30°C and 95% relative humidity for a methyl iodide penetration of:
 - a. $\leq 2.5\%$ for 2 inch charcoal adsorber beds, or
 - b. $\leq 0.5\%$ for 4 inch charcoal adsorber beds.
- d. At least once per 18 months by:
 1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is < 6 inches Water Gauge while operating the system at a flow rate of 2000 cfm $\pm 10\%$.
 2. Verifying that on a control room high radiation or high chlorine test signal, the system automatically isolates the control room within 10 seconds and switches into a recirculation mode of operation with flow through the HEPA filters and charcoal adsorber banks.
- e. After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter banks remove $\geq 99.95\%$ of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 2000 cfm $\pm 10\%$.

3/4.3 INSTRUMENTATION

BASES

3/4.3.3 MONITORING INSTRUMENTATION

3/4.3.3.1 RADIATION MONITORING INSTRUMENTATION

The OPERABILITY of the radiation monitoring channels ensures that 1) the radiation levels are continually measured in the areas served by the individual channels and 2) the alarm or automatic action is initiated when the radiation level trip setpoint is exceeded.

The PURGE as defined in the definitions section is a release under a purge permit, whereas continuous ventilation is defined as operation of the purge system after the requirements of the purge permit have been satisfied. When securing the containment purge system to meet the ACTION requirements of this Specification, at least one supply valve and one exhaust valve is to be closed, and the supply and exhaust fans secured.

The principal function of the Control Room Ventilation Monitors is to provide an enclosed environment from which the unit can be operated following an uncontrolled release of radioactivity. Due to the unique arrangement of the shared control room envelope, one control room isolation channel receives a high radiation signal from the ANO-1 control room area radiation monitor and the redundant channel receives a high radiation signal from the ANO-2 control room ventilation process monitor. With neither channel of the control room radiation monitoring system operable, the CREVS must be placed in a condition that does not require the isolation to occur (i.e., one operable train of CREVS is placed in the emergency recirculation mode of operation. Reactor operation may continue indefinitely in this state.

3/4.3.3.2 DELETED

3/4.3.3.3 SEISMIC INSTRUMENTATION

The OPERABILITY of the seismic instrumentation ensures that sufficient capability is available to promptly determine the magnitude of a seismic event and evaluate the response of those features important to safety. This capability is required to permit comparison of the measured response to that used in the design basis for the facility to determine if plant shutdown is required pursuant to Appendix "A" of 10 CFR Part 100. The instrumentation is consistent with the recommendations of Safety Guide 12, "Instrumentation for Earthquakes," March, 1971.

3/4.3.3.4 METEOROLOGICAL INSTRUMENTATION

The OPERABILITY of the meteorological instrumentation ensures that sufficient meteorological data is available for estimating potential radiation doses to the public as a result of routine or accidental release of radioactive materials to the atmosphere. This capability is required to evaluate the need for initiating protective measures to protect the health and safety of the public and is consistent with the recommendations of Regulatory Guide 1.23 "Onsite Meteorological Programs," February 1972.

3/4.3.3.5 REMOTE SHUTDOWN INSTRUMENTATION

The OPERABILITY of the remote shutdown instrumentation ensures that sufficient capability is available to permit shutdown and maintenance of HOT STANDBY of the facility from locations outside of the control room. This capability is required in the event control room habitability is lost and is consistent with General Design Criteria 19 of 10 CFR 50.

PLANT SYSTEMS

BASES

3/4.7.6 CONTROL ROOM EMERGENCY AIR CONDITIONING/AIR FILTRATION SYSTEM

The OPERABILITY of the control room emergency ventilation and air conditioning system ensures that 1) the ambient air temperature does not exceed the allowable temperature for continuous duty rating for the equipment and instrumentation cooled by this system and 2) the control room will remain habitable for operations personnel during and following all credible accident conditions. The OPERABILITY of this system in conjunction with control room design provisions is based on limiting the radiation exposure to personnel occupying the control room to 5 rem or less whole body, or its equivalent. This limitation is consistent with the requirements of General Design Criteria 19 of Appendix "A", 10 CFR 50.

Unit 1 and Unit 2 control rooms are a single environment for emergency ventilation and air conditioning concerns. Since the control room emergency ventilation and air conditioning equipment is shared between units, the plant status of both units must be considered when determining applicability of the specification.

Due to the unique situation of the shared emergency ventilation and air conditioning equipment, the components may be cross fed from the opposite unit per predetermined contingency actions/procedures. During modes when the emergency control room ventilation and emergency air conditioning is not required on Unit 2, Unit 1 may take credit for operability of these systems when configured to achieve separation and independence regardless of normal power and/or service water configuration. This will be in accordance with predetermined contingency actions/procedures.

The control room emergency ventilation system consists of two independent filter and fan trains, two independent actuation channels per Unit and the Control Room isolation dampers. The control room dampers isolate the control room within 10 seconds of receipt of a high radiation signal.

If the actuation signal can not start the emergency ventilation recirculation fan, operating the affected fan in the manual recirculation mode and isolating the control room isolation dampers provides the required design function of the control room emergency ventilation system to isolate the combined control rooms to ensure that the control rooms will remain habitable for operations personnel during and following accident conditions. This contingency action should be put in place immediately (within 1 hour) to fully satisfy the design functions of the control room emergency ventilation system.

The control room emergency air conditioning system (CREACS) provides temperature control for the control room following isolation of the control room. It is manually started from Unit Two Control Room. The CREACS consists of two independent and redundant trains that provide cooling of recirculated control room air. A cooling coil and a water cooled condensing unit are provided for each system to provide suitable temperature conditions in the control room for operating personnel and safety related control equipment.

With both trains of the control room emergency ventilation and/or emergency air conditioning inoperable, the function of the control room emergency air systems have been lost, requiring immediate action to place the reactor in a condition where the specification does not apply.

PLANT SYSTEMS

BASES

3/4.7.8 SHOCK SUPPRESSORS (SNUBBERS)

All snubbers are required OPERABLE to ensure that the structural integrity of the reactor coolant system and all other safety-related systems is maintained during and following a seismic or other event initiating dynamic loads. Snubbers excluded from this inspection program are those installed on nonsafety-related systems and then only if their failure or failure of the system on which they are installed would have no adverse effect on any safety-related system.

The visual inspection frequency is based upon maintaining a constant level of snubber protection to systems. Therefore, the required inspection interval varies based upon the number of INOPERABLE snubbers found during the previous inspection in proportion to the sizes of the various snubber populations or categories and the previous inspection interval as specified in NRC Generic Letter 90-09, "Alternative Requirements For Snubber Visual Inspection Intervals and Corrective Actions". Inspections performed before that interval has elapsed may be used as a new reference point to determine the next inspection. However, the result of such early inspections performed before the original required time interval has elapsed (nominal time less 25%) may not be used to lengthen the required inspection interval. Any inspection whose results require a shorter inspection interval will override the previous schedule.

When the cause of the rejection of a snubber is clearly established and remedied for that snubber and for any other snubbers that may be generically susceptible and verified by inservice functional testing, that snubber may be exempted from being counted as inoperable. Generically susceptible snubbers are those which are of a specific make or model and have the same design features directly related to rejection of the snubber by visual inspection, or are similarly located or exposed to the same environmental conditions such as temperature, radiation and vibration.

When a snubber is found inoperable, an engineering evaluation is performed, in addition to the determination of the snubber mode of failure, in order to determine if any safety-related component or system has been adversely affected by the inoperability of the snubber. The engineering evaluation is performed to determine whether or not the snubber mode of failure has imparted a significant effect or degradation on the supported component or system.

If a review and evaluation of an INOPERABLE snubber is performed and documented to justify continued operation and provided that all design criteria are met with the INOPERABLE snubber, then the INOPERABLE snubber would not need to be restored or replaced.

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.

PLANT SYSTEMS

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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

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.

MARKUP OF CURRENT ANO-1 TECHNICAL SPECIFICATIONS

(FOR INFO ONLY)

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- 3.5.1.7 The Decay Heat Removal System isolation valve closure setpoints shall be equal to or less than 340 psig for one valve and equal to or less than 400 psig for the second valve in the suction line. The relief valve setting for the DHR system shall be equal to or less than 450 psig.
- 3.5.1.8 The degraded voltage monitoring relay settings shall be as follows:
- a. The 4.16 KV emergency bus undervoltage relay setpoints shall be >3115 VAC but <3177 VAC.
 - b. The 460 V emergency bus undervoltage relay setpoints shall be >423 VAC but <431 VAC with a time delay setpoint of 8 seconds \pm 1 second.
- 3.5.1.9 The following Reactor Trip circuitry shall be operable as indicated:
1. Reactor trip upon loss of Main Feedwater shall be operable (as determined by Specification 4.1.a and item 35 of Table 4.1-1) at greater than 5% reactor power. (May be bypassed up to 10% reactor power.)
 2. Reactor trip upon Turbine Trip shall be operable (as determined by Specification 4.1.a and item 41 of Table 4.1-1) at greater than 5% reactor power. (May be bypassed up to 45% reactor power.)
 3. If the requirements of Specifications 3.5.1.9.1 or 3.5.1.9.2 cannot be met, restore the inoperable trip within 12 hours or bring the plant to a hot shutdown condition.
- 3.5.1.10 ~~The~~two control room ventilation chlorine detection systems ~~instrumentation~~ shall be operable and capable of actuating control room isolation and ~~filtration~~ emergency ventilation systems, with alarm/trip setpoints adjusted to actuate at a chlorine concentration of \leq 5ppm whenever the reactor coolant system is above the cold shutdown condition.
- 3.5.1.11 For on-line testing of the Emergency Feedwater Initiation and Control (EFIC) system channels during power operation only one channel shall be locked into "maintenance bypass" at any one time. If one channel of the NI/RPS is in maintenance bypass, only the corresponding channel of EFIC may be bypassed.
- 3.5.1.12 The Containment High Range Radiation Monitoring instrumentation shall be operable with a minimum measurement range from 1 to 10⁷ R/hr.

- 3.5.1.13 The Seismic Monitoring Instrumentation shall be operable with a minimum measurement range of 0.01 - 1.0 g for Triaxial Time - History Accelerographs, 0.05 - 1.0 g for Triaxial Peak Accelerographs, and 2-25.4 Hz for Triaxial Response Spectrum Recorders.
- 3.5.1.14 The Main Steam Line Radiation Monitoring Instrumentation shall be operable with a minimum measurement range from 10^{-1} to 10^4 mR/hr, whenever the reactor is above the cold shutdown condition.
- 3.5.1.15 Initiate functions of the EFIC system which are bypassed at cold shutdown conditions shall have the following minimum operability conditions:
- a. "low steam generator pressure" initiate shall be operable when the main steam pressure exceeds 750 psig.
 - b. "loss of 4 RC pumps" initiate shall be operable when neutron flux exceeds 10% power.
 - c. "main feedwater pumps tripped" initiate shall be operable when neutron flux exceeds 10% power.
- 3.5.1.16 The automatic steam generator isolation system within EFIC shall be operable when main steam pressure is greater than 750 psig.
- 3.5.1.17 Two control room ventilation radiation monitoring channels shall be operable whenever the reactor coolant system is above the cold shutdown condition or during handling of irradiated fuel.

The OPERABILITY of the Seismic Monitoring Instrumentation ensures that sufficient capability is available to promptly determine the magnitude of a seismic event and evaluate the response of those features important to safety. This capability is required to permit comparison of the measured response to that used in the design basis for the facility to determine if plant shutdown is required pursuant to Appendix "A" of 10CFR Part 100. The instrumentation is consistent with the recommendations of Safety Guide 12, "Instrumentation for Earthquake," published March 19, 1971, and NUREG-0800 Section 3.7.4, "Seismic Instrumentation."

To support loss of main feedwater analyses, steam line/feedwater line break analyses, SBLOCA analyses, and NUREG-0737 requirements, the EFIC system is designed to automatically initiate EFW when:

1. all four RC pumps are tripped
2. both main feedwater pumps are tripped
3. the level of either steam generator is low
4. either steam generator pressure is low
5. ESAS ECCS actuation (high RB pressure or low RCS pressure)

The EFIC system is also designed to isolate the affected steam generator on a steam line/feedwater line break and supply EFW to the intact generator according to the following logic:

- If both SG's are above 600 psig, supply EFW to both SG's.
- If one SG is below 600 psig, supply EFW to the other SG.
- If both SG's are below 600 psig, but the pressure difference between the two SG's exceeds 100 psig, supply EFW only to the SG with the higher pressure.
- If both SG's are below 600 psig and the pressure difference is less than 100 psig, supply EFW to both SG's.

At cold shutdown conditions all EFIC initiate and isolate functions are bypassed except low steam generator level initiate. The bypassed functions will be automatically reset at the values or plant conditions identified in Specification 3.5.1.15. "Loss of 4 RC pumps" initiate and "low steam generator pressure" initiate are the only shutdown bypasses to be manually initiated during cooldown. If reset is not done manually, they will automatically reset. Main feedwater pump trip bypass is automatically removed above 10% power.

The principal function of the Control Room Isolation-High Radiation is to provide an enclosed environment from which the unit can be operated following an uncontrolled release of radioactivity. Due to the unique arrangement of the shared control room envelope, one control room isolation channel receives a high radiation signal from the ANO-1 control room area radiation monitor and the redundant channel receives a high radiation signal from the ANO-2 control room ventilation process monitor. With neither channel of the control room radiation monitoring system operable, the CREVS must be placed in a condition that does not require the isolation to occur (i.e., one operable train of CREVS is placed in the emergency recirculation mode of operation. Reactor operation may continue indefinitely in this state.

REFERENCE

FSAR, Section 7.1
FSAR, Section 2.7.6

Table 3.5.1-1 (cont'd)

OTHER SAFETY RELATED SYSTEMS
(Cont'd)

| Functional Unit | 1 | 2 | 3 | 4 | 5 |
|---|----------------------------|--|---------------------------------------|--|---|
| | <u>No. of channels</u> | <u>No. of channels for sys- tem trip</u> | <u>Min. operable channels</u> | <u>Min. degree of redundancy</u> | <u>Operator action if conditions of column 3 or 4 cannot be met</u> |
| c. Triaxial Response-Spectrum Recorders | | | | | |
| 1. 2XR-8350, Unit 2 Containment Base Slab, Elev. 335' 6" O/S Containment) | 1 | N/A | 1 | 0 | Note 27 |
| 15. Reactor Vessel Level Monitoring System | 2 | N/A | 2 | 0 | Note 28, 29 |
| 16. Hot Leg Level Measurement System (HLLMS) | 2 | N/A | 2 | 0 | Note 28, 29 |
| 17. Main Steam Line Radiation Monitors | 1 /steam line | N/A | 1/steam line | 0 | Note 30 |
| <u>18. Control Room Radiation Monitors</u> | <u>2</u> | <u>1</u> | <u>2</u> | <u>1</u> | <u>Note 17, 18</u> |

TABLE 3.5.1-1 (Cont'd)

12. With the number of operable channels less than required, either return the indicator to operable status within 24 hours, or verify the block valve closed and power removed within an additional 24 hours. If the block valve cannot be verified closed within the additional 24 hours, de-energize the electromatic relief valve power supply within the following 12 hours.
13. Channels may be bypassed for not greater than 30 seconds during reactor coolant pump starts. If the automatic bypass circuit or its alarm circuit is inoperable, the undervoltage protection shall be restored within 1 hour, otherwise, Note 14 applies.
14. With the number of channels less than required, restore the inoperable channels to operable status within 72 hours or be in HOT SHUTDOWN within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
15. This trip function may be bypassed at up to 10% reactor power.
16. This trip function may be bypassed at up to 45% reactor power.
17. With no channel operable, within 1 hour ~~restore the inoperable channels to operable status, or~~ initiate and maintain operation of the control room emergency ventilation system in the recirculation mode of operation.
18. With one channel inoperable, restore the inoperable channel to operable status within 7 days or within the next 6 hours initiate and maintain operation of the control room emergency ventilation system in the recirculation mode of operation.
19. This function may be bypassed below 750 psig OTSG pressure. Bypass is automatically removed when pressure exceeds 750 psig.
20. With one channel inoperable, (1) either restore the inoperable channel to operable status within 7 days, or (2) prepare and submit a Special Report to the Commission pursuant to Specification 6.12.5 within 30 days following the event, outlining the action taken, the cause of the inoperability, and the plans and schedule for restoring the system to operable status. With both channels inoperable, initiate alternate methods of monitoring the containment radiation level within 72 hours in addition to the actions described above.
21. With one channel inoperable, restore the inoperable channel to operable status within 30 days or be in hot shutdown within 72 hours unless containment entry is required. If containment entry is required, the inoperable channel must be restored by the next refueling outage. If both channels are inoperable, restore the inoperable channels within 30 days or be in HOT SHUTDOWN within 12 hours.

- 3.8.15 Storage in the spent fuel pool shall be restricted to fuel assemblies having initial enrichment less than or equal to 4.1 w/o U-235. The provisions of Specification 3.0.3 are not applicable.
- 3.8.16 Storage in Region 2 (as shown on Figure 3.8.1) of the spent fuel pool shall be further restricted by burnup and enrichment limits specified in Figure 3.8.2. In the event a checkerboard storage configuration is deemed necessary for a portion of Region 2, vacant spaces adjacent to the faces of any fuel assembly which does not meet the Region 2 burnup criteria (non-restricted) shall be physically blocked before any such fuel assembly may be placed in Region 2. This will prevent inadvertent fuel assembly insertion into two adjacent storage locations. The provisions of Specification 3.0.3 are not applicable.
- 3.8.17 The boron concentration in the spent fuel pool shall be maintained (at all times) at greater than 1600 parts per million.
- 3.8.18 During the handling of irradiated fuel, the control room emergency air conditioning system and the control room emergency ventilation system shall be operable as required by Specification 3.9.

Bases

Detailed written procedures will be available for use by refueling personnel. These procedures, the above specifications, and the design of the fuel handling equipment as described in Section 9.6 of the FSAR incorporating built-in interlocks and safety features, provide assurance that no incident could occur during the refueling operations that would result in a hazard to public health and safety. If no change is being made in core geometry, one flux monitor is sufficient. This permits maintenance on the instrumentation. Continuous monitoring of radiation levels and neutron flux provides immediate indication of an unsafe condition.

The requirement that at least one decay heat removal loop be in operation ensures that (1) sufficient cooling capacity is available to remove decay heat and maintain the water in the reactor pressure vessel at the refueling temperature (normally 140°F), and (2) sufficient coolant circulation is maintained through the reactor core to minimize the effects of a boron dilution incident and prevent boron stratification.⁽¹⁾

The requirement to have two decay heat removal loops operable when there is less than 23 feet of water above the core, ensures that a single failure of the operating decay heat removal loop will not result in a complete loss of decay heat removal capability. With the reactor vessel head removed and 23 feet of water above the core, a large heat sink is available for core cooling, thus in the event of a failure of the operating decay heat removal loop, adequate time is provided to initiate emergency procedures to cool the core.

The shutdown margin indicated in Specification 3.8.4 will keep the core subcritical, even with all control rods withdrawn from the core.⁽²⁾ Although the refueling boron concentration is sufficient to maintain the core $k_{eff} \leq 0.99$ if all the control rods were removed from the core, only a few control rods will be removed at any one time during fuel shuffling and

3.9 CONTROL ROOM EMERGENCY VENTILATION AND AIR CONDITIONING AND ISOLATION SYSTEMS

Applicability

Applies to the operability of the control room emergency ventilation and air conditioning and isolation systems.

Objective

To ensure that the control room emergency ventilation and air conditioning and isolation systems will perform within acceptable levels of efficiency and reliability.

Specification

3.9.1 Control Room Emergency Air Conditioning System

3.9.1.1 Two independent trains of the control room emergency air conditioning system shall be operable whenever the reactor coolant system is above the cold shutdown condition or during handling of irradiated fuel.

3.9.1.2 With one control room emergency air conditioning system inoperable, restore the inoperable system to Operable status within 30 days or be in at least Hot Shutdown within the next 6 hours and in Cold Shutdown within the following 30 hours.

~~Two independent circuits of the control room emergency air conditioning and isolation system shall be operable whenever reactor building integrity is required with the following performance capabilities:~~

- ~~a. The results of the in-place cold DOP and halogenated hydrocarbon tests at design flow ($\pm 10\%$) on HEPA filters and charcoal adsorber banks shall show $\geq 99\%$ DOP removal and $\geq 99\%$ halogenated hydrocarbon removal.~~
- ~~b. The results of laboratory carbon sample analysis from the charcoal adsorber banks shall show $\geq 90\%$ radioactive methyl iodide removal at a velocity within $\pm 20\%$ of system design, 0.05 to 0.15 mg/m^3 inlet iodide concentration, $\geq 95\%$ R. H. and $\geq 125\text{F}$.~~
- ~~c. Fans shall be shown to operate within $\pm 10\%$ of design flow.~~
- ~~d. The pressure drop across the combined HEPA filters and charcoal adsorber banks shall be less than 6 inches of water at system design flow rate ($\pm 10\%$).~~
- ~~e. One circuit of the system shall be capable of automatic initiation.~~
- ~~f. The dampers shall isolate the control room within 10 seconds after receipt of a high radiation signal.~~

3.9.2 Control Room Emergency Ventilation System

3.9.2.1 Two independent trains of the control room emergency ventilation system shall be operable whenever the reactor coolant system is above the cold shutdown condition or during handling of irradiated fuel.

3.9.2.2 With one control room emergency ventilation system inoperable, restore the inoperable system to Operable status within 7 days or be in at least Hot Shutdown within the next 6 hours and in Cold Shutdown within the following 30 hours.

~~If one circuit of the control room emergency air conditioning and isolation system is made or found to be inoperable for any reason, reactor operation is permissible only during the succeeding seven days provided that during such seven days all active components of the other circuit shall be operable.~~

~~3.9.3 If the requirements of Specification 3.9.1.f cannot be met, either close the isolation dampers or disable the fan.~~

~~3.9.4 If the requirements of Specifications 3.9.1 and 3.9.2 cannot be met the reactor shall be placed in the cold shutdown condition within 36 hours.~~

Bases

The control room emergency air conditioning and isolation system is designed to isolate the control room and filter the control room atmosphere during control room isolation conditions. One circuit is designed to automatically start upon control room isolation and the other circuit to be manually started on failure of the first circuit.

High efficiency particulate air (HEPA) filters are installed before the charcoal adsorbers to prevent clogging of the iodine adsorbers. The charcoal adsorbers are installed to reduce the potential intake of radioiodine to the control room. The in-place test results should indicate a system leak tightness of less than 1 percent bypass leakage for the charcoal adsorbers and a HEPA efficiency of at least 99 percent removal of DOP particulates. The laboratory carbon sample test results should indicate a radioactive methyl iodide removal efficiency of at least 90 percent for expected accident conditions. If the efficiencies of the HEPA filters and charcoal adsorbers are as specified, the resulting doses will be less than the allowable levels stated in Criterion 19 of the General Design Criteria for Nuclear Power Plants, Appendix A to 10 CFR Part 50. Operation of the fans significantly different from the design flow will change the removal efficiency of the HEPA filters and charcoal adsorbers.

If one circuit of the control room emergency air conditioning and isolation system is found to be inoperable, there is not an immediate threat to the control room and reactor operation may continue for a limited period of time while repairs are being made.

If the control room isolation dampers are made or found to be inoperable, continued reactor operation is allowed provided the potential for outside air flow is removed as provided by Specification 3.9.3. The 10 second closure time requirement is far below that required to support accident dose calculations and is therefore conservative.

The control room emergency ventilation and air conditioning system is designed to isolate the combined control rooms to ensure that the control rooms will remain habitable for Operations personnel during and following all credible accident conditions and to ensure that the ambient air temperature does not exceed the allowable temperature for continuous duty rating for the equipment and instrumentation cooled by this system. The design configuration of the system is based on limiting the radiation exposure to personnel occupying the control room to 5 REM or less whole body, or its equivalent, in accordance with the requirements of General Design Criteria 19 of Appendix A, 10CFR 50.

Unit 1 and Unit 2 control rooms are a single environment for emergency ventilation and air conditioning concerns. Since the control room emergency ventilation and air conditioning equipment is shared between units, the plant status of both units must be considered when determining applicability of the specification.

Due to the unique situation of the shared emergency ventilation and air conditioning equipment, the components may be cross fed from the opposite unit per predetermined contingency actions/procedures. During modes when the emergency control room ventilation and emergency air conditioning is not required on Unit 2, Unit 1 may take credit for operability of these systems when configured to achieve separation and independence regardless of normal power

and/or service water configuration. This will be in accordance with pre-determined contingency actions/procedures.

The control room emergency ventilation system consists of two independent filter and fan trains, two independent actuation channels per Unit and the Control Room isolation dampers. The control room dampers isolate the control room within 10 seconds of receipt of a high radiation signal. If the actuation signal can not close the control room isolation dampers, isolating the control room by manually closing the affected control room dampers provides the required isolation design function of the Control Room Emergency Ventilation System.

If the actuation signal can not start the emergency ventilation recirculation fan, operating the affected fan in the manual recirculation mode and isolating the control room isolation dampers provides the required design function of the control room emergency ventilation system to isolate the combined control rooms to ensure that the control rooms will remain habitable for operations personnel during and following accident conditions. This contingency action should be put in place immediately (within 1 hour) to fully satisfy the design functions of the control room emergency ventilation system.

The control room emergency air conditioning system (CREACS) provides temperature control for the control room following isolation of the control room. It is manually started from Unit Two Control Room. The CREACS consists of two independent and redundant trains that provide cooling of recirculated control room air. A cooling coil and a water cooled condensing unit are provided for each system to provide suitable temperature conditions in the control room for operating personnel and safety related control equipment.

With both trains of the control room emergency ventilation and/or emergency air conditioning inoperable, the function of the control room emergency air systems have been lost, requiring immediate action to place the reactor in a condition where the specification does not apply.

Table 4.1-1 (Cont.)

| <u>Channel Description</u> | <u>Check</u> | <u>Test</u> | <u>Calibrate</u> | <u>Remarks</u> |
|--|--------------|-------------|------------------|----------------|
| 47. RCS Subcooling Margin Monitor | D | NA | R | |
| 48. Electromatic Relief Valve Flow Monitor | D | NA | R | |
| 49. Electromatic Relief Block Valve Position Indicator | D | NA | R | |
| 50. Pressurizer Safety Valve Flow Monitor | D | NA | R | |
| 51. Pressurizer Water Level Indicator | D | NA | R | |
| 52. Control Room Chlorine Detector | <u>SD</u> | M | R | |
| 53. EFW Initiation | | | | |
| a. Manual | NA | M | NA | |
| b. SG Low Level, SGA or B | S | M | R | |
| c. Low Pressure SGA or B | S | M | R | |
| d. Loss of both MFW Pumps and PWR > 10% | S | M | R | |

4.10 CONTROL ROOM EMERGENCY VENTILATION AND AIR CONDITIONING AND ISOLATION
SYSTEM SURVEILLANCE

Applicability

Applies to the surveillance of the control room emergency ventilation and air conditioning and isolation systems.

Objective

To verify an acceptable level of efficiency and operability of the control room emergency ventilation and air conditioning and isolation systems.

Specification

4.10.1 Each train of control room emergency air conditioning shall be demonstrated Operable:

a. At least once per 31 days on a STAGGERED TEST BASIS by:

1. Starting each unit and

2. Verifying that each unit operates for at least 1 hour and maintains the control room air temperature $\leq 84^{\circ}\text{F D.B.}$

b. At least once per 18 months by verifying a system flow rate of 9900 cfm $\pm 10\%$.

At intervals not to exceed 18 months, the pressure drop across the combined HEPA filters and charcoal adsorber banks shall be demonstrated to be less than 6 inches of water at system design flow ($\pm 10\%$).

4.10.2 Each Control Room Emergency Ventilation System shall be demonstrated Operable:

a. At least once per 31 days on a Staggered Test Basis by initiating, from the Control Room, flow through the HEPA filters and charcoal adsorbers and verifying that the system operates for at least 15 minutes.

b. At least once per 18 months or 1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or 2) following significant painting, fire, or chemical release in any ventilation zone communicating with the system by:

1. Verifying that the cleanup system satisfies the in-place testing acceptance criteria and uses the test procedures of Regulatory Positions C.5.a, C.5.c, and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 2000 cfm $\pm 10\%$.

2. Verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of ASTM D3803-1989 when tested at 30°C and 95% relative humidity for a methyl iodide penetration of:

a. $\leq 2.5\%$ for 2 inch charcoal adsorber beds, or

b. $\leq 0.5\%$ for 4 inch charcoal adsorber beds.

3. Verifying a system flow rate of 2000 cfm $\pm 10\%$ during system operation when tested in accordance with ANSI N510-1975.

~~At intervals not to exceed 18 months, automatic initiation of the control room emergency air conditioning and isolation system shall be demonstrated to meet the requirements of Specification 3.9.~~

~~4.10.3 a. The tests and sample analysis of Specification 3.9.1.a, b, & c, shall be performed at intervals not to exceed 18 months or after every 720 hours of system operation and following significant painting, fire or chemical release in any ventilation zone communicating with the system.~~

~~———— b. Cold DOP testing shall also be performed after each complete or partial replacement of the HEPA filter bank or after any structural maintenance on the system housing.~~

~~———— c. Halogenated hydrocarbon testing shall also be performed after each complete or partial replacement of the charcoal adsorber bank or after any structural maintenance on the system housing.~~

~~4.10.4 Each circuit shall be operated at least 1 hour every month.~~

Bases

~~The purpose of the control room filtering system is to limit the particulate and gaseous fission products to which the control area would be subjected during an accidental radioactive release in or near the Auxiliary Building. The system is designed with 100 percent capacity filter trains which consist of a prefilter, high efficiency particulate filters, charcoal adsorbers and a fan.~~

~~Since the system is not normally operated, a periodic test is required to insure operability when needed. During this test the system will be inspected for such things as water, oil, or other foreign material, gasket deterioration,~~

- c. After every 720 hours of charcoal adsorber operation by verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of ASTM D3803-1989 when tested at 30°C and 95% relative humidity for a methyl iodide penetration of:
- a. ≤2.5% for 2 inch charcoal adsorber beds, or
 - b. ≤0.5% for 4 inch charcoal adsorber beds.
- d. At least once per 18 months by:
- 1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is <6 inches of water while operating at a flowrate of 2000 cfm ±10%.
 - 2. Verifying that on a Control Room high radiation test signal, the system automatically isolates the Control Room within 10 seconds and switches into a recirculation mode of operation with flow through the HEPA filters and charcoal adsorber banks.
- e. After each complete or partial replacement of the HEPA filter bank by verifying that the HEPA filter banks remove ≥99.95% of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 2000 cfm ±10%.
- f. After each complete or partial replacement of a charcoal adsorber bank by verifying that the charcoal adsorbers remove ≥99.95% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 2000 cfm ±10%.

Bases

The purpose of the control room filtering emergency ventilation system is to limit the particulate and gaseous fission products to which the control area would be subjected during an accidental radioactive release in or near the Auxiliary Building. The system is designed with 100 percent capacity filter trains which consist of a prefilter, high efficiency particulate filters, charcoal adsorbers and a fan.

Since the emergency ventilation system is not normally operated, a periodic test is required to insure operability when needed. During this test the system will be inspected for such things as water, oil, or other foreign material; gasket deterioration, adhesive deterioration in the HEPA units; and unusual or excessive noise or vibration when the fan motor is running. Pressure drop across the combined HEPA filters and charcoal adsorbers of less than 6 inches of water at the system design flow rate will indicate that the filters and adsorbers are not clogged by excessive amounts of foreign matter. Pressure drop should be determined at least once per operating cycle to show system performance capability.

~~The frequency of tests and sample analysis are necessary to show that the HEPA filters and charcoal adsorbers can perform as evaluated. The charcoal adsorber efficiency test procedures should allow for obtaining at least two samples. Each sample should be at least two inches in diameter and a length equal to the thickness of the bed. Tests of the charcoal adsorbers with DOP aerosol shall be performed in accordance with ANSI N510 (1975) "Standard for Testing of Nuclear Air Cleaning Systems." Any HEPA filters found defective shall be replaced with filters qualified according to~~

~~Regulatory Position C.3.d of Regulatory Guide 1.52. Radioactive methyl iodide removal efficiency tests shall be performed in accordance with RDT Standard M16-IT. If laboratory test results are unacceptable, all charcoal adsorbents in the system shall be replaced with charcoal adsorbent qualified according to Regulatory Guide 1.52.~~

~~Operation of the systems for 1 hour every month will demonstrate operability of the filters and adsorber system. All dampers and other mechanical and isolation systems will be shown to be operable.~~

~~If significant painting, fire or chemical release occurs such that the HEPA filter or charcoal adsorber could become contaminated from the fumes, chemicals or foreign material, the same tests and sample analysis shall be performed as required for operational use. The determination of significant shall be made by the operator on duty at the time of the incident. Knowledgeable staff members should be consulted prior to making this determination.~~

Bases (Continued)

The frequency of tests and sample analysis are necessary to show that the HEPA filters and charcoal adsorbers can perform as evaluated. The charcoal adsorber efficiency test procedures should allow for obtaining at least two samples. Each sample should be at least two inches in diameter and a length equal to the thickness of the bed. Tests of the charcoal adsorbers with DOP aerosol shall be performed in accordance with ANSI N510 (1975) "Standard for Testing of Nuclear Air Cleaning Systems." Any HEPA filters found defective shall be replaced with filters qualified according to Regulatory Position C.3.d of Regulatory Guide 1.52. If laboratory test results are unacceptable, all charcoal adsorbents in the system shall be replaced with charcoal adsorbent qualified according to Regulatory Guide 1.52.

The operability of the Control Room Emergency Air Conditioning Systems ensure that the ambient air temperature does not exceed the allowable temperature for the equipment and instrumentation cooled by this system and the Control Room will remain habitable for Operations personnel during and following all credible accident conditions.

Operation of the systems for 1 hour every month will demonstrate operability of the emergency ventilation and emergency air conditioning systems. All dampers and other mechanical and isolation systems will be shown to be operable.

If significant painting, fire or chemical release occurs such that the HEPA filter or charcoal adsorber could become contaminated from the fumes, chemicals or foreign material, the same tests and sample analysis shall be performed as required for operational use. The determination of significant shall be made by the operator on duty at the time of the incident. Knowledgeable staff members should be consulted prior to making this determination.

MARKUP OF CURRENT ANO-2 TECHNICAL SPECIFICATIONS

(FOR INFO ONLY)

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TABLE 3.3-6

RADIATION MONITORING INSTRUMENTATION

| <u>INSTRUMENT</u> | <u>MINIMUM CHANNELS OPERABLE</u> | <u>APPLICABLE MODES</u> | <u>ALARM/TRIP SETPOINT</u> | <u>MEASUREMENT RANGE</u> | <u>ACTION</u> |
|--|--|-----------------------------|--|---------------------------------------|-------------------|
| 1. AREA MONITORS | | | | | |
| a. Spent Fuel Pool Area Monitor | 1 | Note 1 | $\leq 1.5 \times 10^{-2}$ R/hr | $10^{-4} - 10^1$ R/hr | 13 |
| b. Containment High Range | 2 | 1, 2, 3 & 4 | Not Applicable | $1 - 10^7$ R/hr | 18 |
| 2. PROCESS MONITORS | | | | | |
| a. Containment | | | | | |
| i. Gaseous Activity | | | | | |
| a) Purge & Exhaust Isolation | 1 | 5 & 6 | $\leq 2 \times$ background | $10 - 10^6$ cpm | 16 |
| b) RCS Leakage Detection | 1 | 1, 2, 3 & 4 | Not Applicable | $10 - 10^6$ cpm | 14 |
| ii. Particulate Activity | | | | | |
| a) RCS Leakage Detection | 1 | 1, 2, 3 & 4 | Not Applicable | $10 - 10^6$ cpm | 14 |
| b. Control Room Ventilation Radiation | | | | | |
| Intake Duct Monitors | 12 | Note 2 ALL MODES | $\leq 2 \times$ background | $10 - 10^6$ cpm | 17, 20 |
| i. Unit 1 Area Monitor Channel | | | ≤ 7 mR/hr | $10^{-1} - 10^4$ mR/hr | |
| ii. Unit 2 Ventilation Intake Duct Monitor Channel | | | $\leq 2 \times$ background | $10 - 10^6$ cpm | |
| c. Main Steam Line Radiation Monitors | 1/Steam Line | 1, 2, 3, & 4 | Not Applicable | $10^{-1} - 10^4$ mR/hr | 19 |

Note 1 - With fuel in the spent fuel pool or building

Note 2 - MODES 1, 2, 3, 4, and during handling of irradiated fuel

TABLE 3.3-6 (Continued)

TABLE NOTATION

- ACTION 13 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, perform area surveys of the monitored area with portable monitoring instrumentation at least once per 24 hours.
- ACTION 14 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, comply with the ACTION requirements of Specification 3.4.6.1.
- ACTION 16 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, complete the following:
- a. If performing CORE ALTERATIONS or moving irradiated fuel within the reactor building, secure the containment purge system or suspend CORE ALTERATIONS and movement of irradiated fuel within the reactor building.
 - b. If a containment PURGE is in progress, secure the containment purge system.
 - c. If continuously ventilating, verify the SPING monitor operable or perform the ACTIONS of 3.3.3.9, or secure the containment purge system.
- ACTION 17 - ~~With the number of no channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, within 1 hour initiate and maintain operation of the control room emergency ventilation system in the recirculation mode of operation.~~
- ACTION 18 - With the number of channels OPERABLE one less than required by the Minimum Channels OPERABLE requirement, (1) either restore the inoperable channel to OPERABLE status within 7 days or (2) prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within 30 days following the event, outlining the action taken, the cause of the inoperability, and the plans and schedule for restoring the system to OPERABLE status. With both channels inoperable, initiate alternate methods of monitoring the containment radiation level within 72 hours in addition to the actions described above.
- ACTION 19 - With the number of OPERABLE Channels less than required by the Minimum Channels OPERABLE requirements, initiate the preplanned alternate method of monitoring the appropriate parameter(s), within 72 hours, and:
- 1) either restore the inoperable Channel(s) to OPERABLE status within 7 days of the event, or
 - 2) prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within 14 days following the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.
- ACTION 20 - With the number of channels OPERABLE one less than required by the Minimum Channels OPERABLE requirement, restore the inoperable channel to OPERABLE status within 7 days, or within the next 6

hours initiate and maintain the control room emergency ventilation system in the recirculation mode of operation.

TABLE 4.3-3

RADIATION MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

| <u>INSTRUMENT</u> | <u>CHANNEL CHECK</u> | <u>CHANNEL CALIBRATION</u> | <u>CHANNEL FUNCTIONAL TEST</u> | <u>MODES IN WHICH SURVEILLANCE REQUIRED</u> |
|--|--------------------------|--------------------------------|--|---|
| 1. AREA MONITORS | | | | |
| a. Spent Fuel Pool Area Monitor | S | R | M | Note 1 |
| b. Containment High Range | S | R Note 4 | M | 1, 2, 3, & 4 |
| 2. PROCESS MONITORS | | | | |
| a. Containment | | | | |
| i. Gaseous Activity | | | | |
| a) Purge & Exhaust Isolation | Note 2 | R | Note 3 | 5 & 6 |
| b) RCS Leakage Detection | S | R | M | 1, 2, 3, & 4 |
| ii. Particulate Activity | | | | |
| a) RCS Leakage Detection | S | R | M | 1, 2, 3, & 4 |
| b. Control Room Ventilation <u>Radiation Intake Duct Monitors</u> | S | R | M | <u>Note 5</u> ALL MODES |
| c. Main Steam Line Radiation Monitors | S | R | M | 1, 2, 3, & 4 |

Note 1 - With fuel in the spent fuel pool or building.

Note 2 - Within 8 hours prior to initiating containment purge operations and at least once per 12 hours during containment purge operations.

Note 3 - Within 31 days prior to initiating containment purge operations and at least once per 31 days during containment purge operations.

Note 4 - Acceptable criteria for calibration are provided in Table II.F.1-3 of NUREG-0737.

Note 5 - MODES 1, 2, 3, 4, and during handling of irradiated fuel.

PLANT SYSTEMS

3/4.7.6 CONTROL ROOM EMERGENCY VENTILATION~~AIR CONDITIONING~~ AND AIR CONDITIONING~~FILTRATION~~ SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.6.1 Two independent control room emergency ~~ventilationair conditioning~~ and air ~~conditioningfiltration~~ systems shall be OPERABLE.

APPLICABILITY: MODES 1,2,3, ~~and~~ 4, and during handling of irradiated fuel.

ACTION:

- a. With one control room emergency air conditioning system inoperable, restore the inoperable system to OPERABLE status within 30 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With one control room emergency ~~ventilationair conditioning or air filtration~~ system inoperable, restore the inoperable system to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.7.6.1.1 Each control room emergency air conditioning system shall be demonstrated OPERABLE:

- a. At least once per 31 days on a STAGGERED TEST BASIS by:
 1. Starting each unit from the control room, and
 2. Verifying that each unit operates for at least 1 hour and maintains the control room air temperature $\leq 84^{\circ}\text{F D.B.}$
- b. At least once per 18 months by verifying a system flow rate of $9900 \text{ cfm} \pm 10\%$.

4.7.6.1.2 Each control room emergency air filtration system shall be demonstrated OPERABLE:

- a. At least once per 31 days on a STAGGERED TEST BASIS by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the system operates for at least 15 minutes.
- b. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the system by:

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

1. Verifying that the cleanup system satisfies the in-place testing acceptance criteria and uses the test procedures of Regulatory Positions C.5.a, C.5.c and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 2000 cfm $\pm 10\%$.
2. Verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of ~~Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978~~ ASTM D3803-1989 when tested at 30°C and 95% relative humidity for a methyl iodide penetration of:
 - a. $\leq 2.5\%$ for 2 inch charcoal adsorber beds, or
 - b. $\leq 0.5\%$ for 4 inch charcoal adsorber beds.
3. Verifying a system flow rate of 2000 cfm $\pm 10\%$ during system operation when tested in accordance with ANSI N510-1975.
- c. After every 720 hours of charcoal adsorber operation by verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of ~~Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978~~ ASTM D3803-1989 when tested at 30°C and 95% relative humidity for a methyl iodide penetration of:
 - a. $\leq 2.5\%$ for 2 inch charcoal adsorber beds, or
 - b. $\leq 0.5\%$ for 4 inch charcoal adsorber beds.
- d. At least once per 18 months by:
 1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is < 6 inches Water Gauge while operating the system at a flow rate of 2000 cfm $\pm 10\%$.
 2. Verifying that on a control room high radiation or high chlorine test signal, the system automatically isolates the control room within 10 seconds and switches into a recirculation mode of operation with flow through the HEPA filters and charcoal adsorber banks.
- e. After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter banks remove $\geq 99.95\%$ of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 2000 cfm $\pm 10\%$.

3/4.3 INSTRUMENTATION

BASES

3/4.3.3 MONITORING INSTRUMENTATION

3/4.3.3.1 RADIATION MONITORING INSTRUMENTATION

The OPERABILITY of the radiation monitoring channels ensures that 1) the radiation levels are continually measured in the areas served by the individual channels and 2) the alarm or automatic action is initiated when the radiation level trip setpoint is exceeded.

The PURGE as defined in the definitions section is a release under a purge permit, whereas continuous ventilation is defined as operation of the purge system after the requirements of the purge permit have been satisfied. When securing the containment purge system to meet the ACTION requirements of this Specification, at least one supply valve and one exhaust valve is to be closed, and the supply and exhaust fans secured.

The principal function of the Control Room Ventilation Monitors is to provide an enclosed environment from which the unit can be operated following an uncontrolled release of radioactivity. Due to the unique arrangement of the shared control room envelope, one control room isolation channel receives a high radiation signal from the ANO-1 control room area radiation monitor and the redundant channel receives a high radiation signal from the ANO-2 control room ventilation process monitor. With neither channel of the control room radiation monitoring system operable, the CREVS must be placed in a condition that does not require the isolation to occur (i.e., one operable train of CREVS is placed in the emergency recirculation mode of operation. Reactor operation may continue indefinitely in this state.

3/4.3.3.2 DELETED

3/4.3.3.3 SEISMIC INSTRUMENTATION

The OPERABILITY of the seismic instrumentation ensures that sufficient capability is available to promptly determine the magnitude of a seismic event and evaluate the response of those features important to safety. This capability is required to permit comparison of the measured response to that used in the design basis for the facility to determine if plant shutdown is required pursuant to Appendix "A" of 10 CFR Part 100. The instrumentation is consistent with the recommendations of Safety Guide 12, "Instrumentation for Earthquakes," March, 1971.

3/4.3.3.4 METEOROLOGICAL INSTRUMENTATION

The OPERABILITY of the meteorological instrumentation ensures that sufficient meteorological data is available for estimating potential radiation doses to the public as a result of routine or accidental release of radioactive materials to the atmosphere. This capability is required to evaluate the need for initiating protective measures to protect the health and safety of the public and is consistent with the recommendations of Regulatory Guide 1.23 "Onsite Meteorological Programs," February 1972.

3/4.3.3.5 REMOTE SHUTDOWN INSTRUMENTATION

The OPERABILITY of the remote shutdown instrumentation ensures that sufficient capability is available to permit shutdown and maintenance of HOT STANDBY of the facility from locations outside of the control room. This capability is required in the event control room habitability is lost and is consistent with General Design Criteria 19 of 10 CFR 50.

PLANT SYSTEMS

BASES

3/4.7.6 CONTROL ROOM EMERGENCY AIR CONDITIONING/AIR FILTRATION SYSTEM

The OPERABILITY of the control room emergency ventilation and air conditioning/~~air~~ filtration system ensures that 1) the ambient air temperature does not exceed the allowable temperature for continuous duty rating for the equipment and instrumentation cooled by this system and 2) the control room will remain habitable for operations personnel during and following all credible accident conditions. The OPERABILITY of this system in conjunction with control room design provisions is based on limiting the radiation exposure to personnel occupying the control room to 5 rem or less whole body, or its equivalent. This limitation is consistent with the requirements of General Design Criteria 19 of Appendix "A", 10 CFR 50.

Unit 1 and Unit 2 control rooms are a single environment for emergency ventilation and air conditioning concerns. Since the control room emergency ventilation and air conditioning equipment is shared between units, the plant status of both units must be considered when determining applicability of the specification.

Due to the unique situation of the shared emergency ventilation and air conditioning equipment, the components may be cross fed from the opposite unit per predetermined contingency actions/procedures. During modes when the emergency control room ventilation and emergency air conditioning is not required on Unit 2, Unit 1 may take credit for operability of these systems when configured to achieve separation and independence regardless of normal power and/or service water configuration. This will be in accordance with predetermined contingency actions/procedures.

The control room emergency ventilation system consists of two independent filter and fan trains, two independent actuation channels per Unit and the Control Room isolation dampers. The control room dampers isolate the control room within 10 seconds of receipt of a high radiation signal.

If the actuation signal can not start the emergency ventilation recirculation fan, operating the affected fan in the manual recirculation mode and isolating the control room isolation dampers provides the required design function of the control room emergency ventilation system to isolate the combined control rooms to ensure that the control rooms will remain habitable for operations personnel during and following accident conditions. This contingency action should be put in place immediately (within 1 hour) to fully satisfy the design functions of the control room emergency ventilation system.

The control room emergency air conditioning system (CREACS) provides temperature control for the control room following isolation of the control room. It is manually started from Unit Two Control Room. The CREACS consists of two independent and redundant trains that provide cooling of recirculated control room air. A cooling coil and a water cooled condensing unit are provided for each system to provide suitable temperature conditions in the control room for operating personnel and safety related control equipment.

With both trains of the control room emergency ventilation and/or emergency air conditioning inoperable, the function of the control room emergency air systems have been lost, requiring immediate action to place the reactor in a condition where the specification does not apply.

3/4.7.8 SHOCK SUPPRESSORS (SNUBBERS)

~~— All snubbers are required OPERABLE to ensure that the structural integrity of the reactor coolant system and all other safety-related systems is maintained during and following a seismic or other event initiating dynamic loads. Snubbers excluded from this inspection program are those installed on nonsafety-related systems and then only if their failure or failure of the system on which they are installed would have no adverse effect on any safety-related system.~~

~~— The visual inspection frequency is based upon maintaining a constant level of snubber protection to systems. Therefore, the required inspection interval varies based upon the number of INOPERABLE snubbers found during the previous inspection in proportion to the sizes of the various snubber populations or categories and the previous inspection interval as specified in NRC Generic Letter 90-09, "Alternative Requirements For Snubber Visual Inspection Intervals and Corrective Actions". Inspections performed before that interval has elapsed may be used as a new reference point to determine the next inspection. However, the result of such early inspections performed before the original required time interval has elapsed (nominal time less 25%) may not be used to lengthen the required inspection interval. Any inspection whose results require a shorter inspection interval will override the previous schedule.~~

~~— When the cause of the rejection of a snubber is clearly established and remedied for that snubber and for any other snubbers that may be generically susceptible and verified by inservice functional testing, that snubber may be exempted from being counted as inoperable. Generically susceptible snubbers are those which are of a specific make or model and have the same design features directly related to rejection of the snubber by visual inspection, or are similarly located or exposed to the same environmental conditions such as temperature, radiation and vibration.~~

~~— When a snubber is found inoperable, an engineering evaluation is performed, in addition to the determination of the snubber mode of failure, in order to determine if any safety-related component or system has been adversely affected by the inoperability of the snubber. The engineering evaluation is performed to determine whether or not the snubber mode of failure has imparted a significant effect or degradation on the supported component or system.~~

~~— If a review and evaluation of an INOPERABLE snubber is performed and documented to justify continued operation and provided that all design criteria are met with the INOPERABLE snubber, then the INOPERABLE snubber would not need to be restored or replaced.~~

PLANT SYSTEMS

BASES

3/4.7.8 SHOCK SUPPRESSORS (SNUBBERS)

All snubbers are required OPERABLE to ensure that the structural integrity of the reactor coolant system and all other safety-related systems is maintained during and following a seismic or other event initiating dynamic loads. Snubbers excluded from this inspection program are those installed on nonsafety-related systems and then only if their failure or failure of the system on which they are installed would have no adverse effect on any safety-related system.

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When a snubber is found inoperable, an engineering evaluation is performed, in addition to the determination of the snubber mode of failure, in order to determine if any safety-related component or system has been adversely affected by the inoperability of the snubber. The engineering evaluation is performed to determine whether or not the snubber mode of failure has imparted a significant effect or degradation on the supported component or system.

If a review and evaluation of an INOPERABLE snubber is performed and documented to justify continued operation and provided that all design criteria are met with the INOPERABLE snubber, then the INOPERABLE snubber would not need to be restored or replaced.

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(e) 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

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

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.