

St. Lucie Unit 1 and Unit 2
Docket Nos. 50-335 and 50-389
Proposed License Amendments
Containment Spray and Cooling Systems

ATTACHMENT 3

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CONTAINMENT SYSTEMS

3/4.6.2 DEPRESSURIZATION AND COOLING SYSTEMS

CONTAINMENT SPRAY SYSTEM

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LIMITING CONDITION FOR OPERATION

3.6.2.1 Two independent containment spray systems shall be OPERABLE with each spray system capable of taking suction from the RWT on a Containment Spray Actuation Signal and automatically transferring suction to the containment sump on a Recirculation Actuation Signal. Each spray system flow path from the containment sump shall be via an OPERABLE shutdown cooling heat exchanger.

APPLICABILITY: MODES 1, 2 and 3*.

ACTION:

- a. With one containment spray system inoperable and all four containment fan coolers OPERABLE, restore the inoperable spray system to OPERABLE status within 30 days or be in HOT SHUTDOWN within the next 12 hours.
- b. With one containment spray system inoperable and one containment fan cooler inoperable, restore either the inoperable spray system or the inoperable fan cooler to OPERABLE status within 72 hours or be in HOT SHUTDOWN within the next 12 hours.

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SURVEILLANCE REQUIREMENTS

4.6.2.1 Each containment spray system shall be demonstrated OPERABLE:

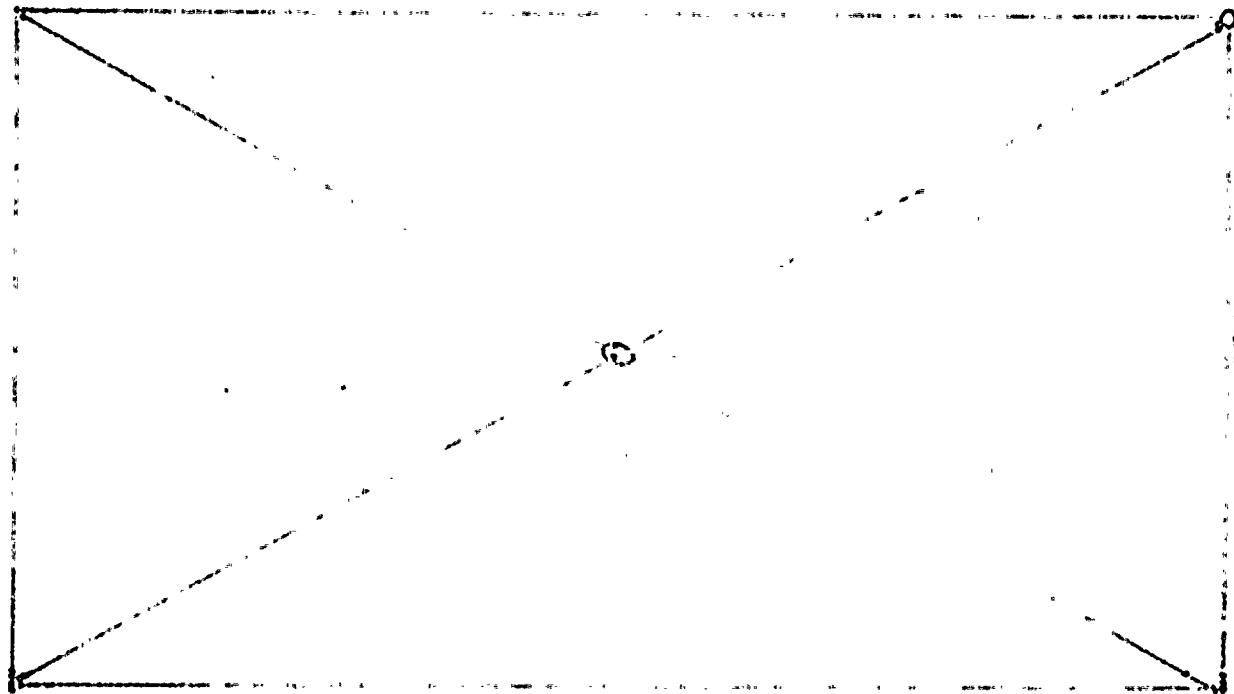
- a. At least once per 31 days by verifying that each valve (manual, power operated or automatic) in the flow path that is not locked, sealed, or otherwise secured in position, is positioned to take suction from the RWT on a Containment Pressure -- High High test signal.
- b. By verifying that on recirculation flow, each spray pump develops a discharge pressure of ≥ 200 psig, when tested pursuant to Specification 4.0.5.

~~Applicable when pressurizer pressure is ≥ 1750 psia.~~

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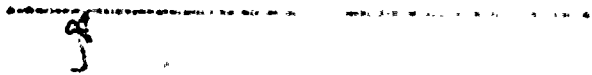
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Containment Spray and Cooling Systems

INSERT - A

3.6.2.1 Two containment spray trains and two containment cooling trains shall be OPERABLE.

APPLICABILITY: Containment Spray System: MODES 1, 2, and MODE 3 with
Pressurizer Pressure \geq 1750 psia.

Containment Cooling System: MODES 1,2, and 3.

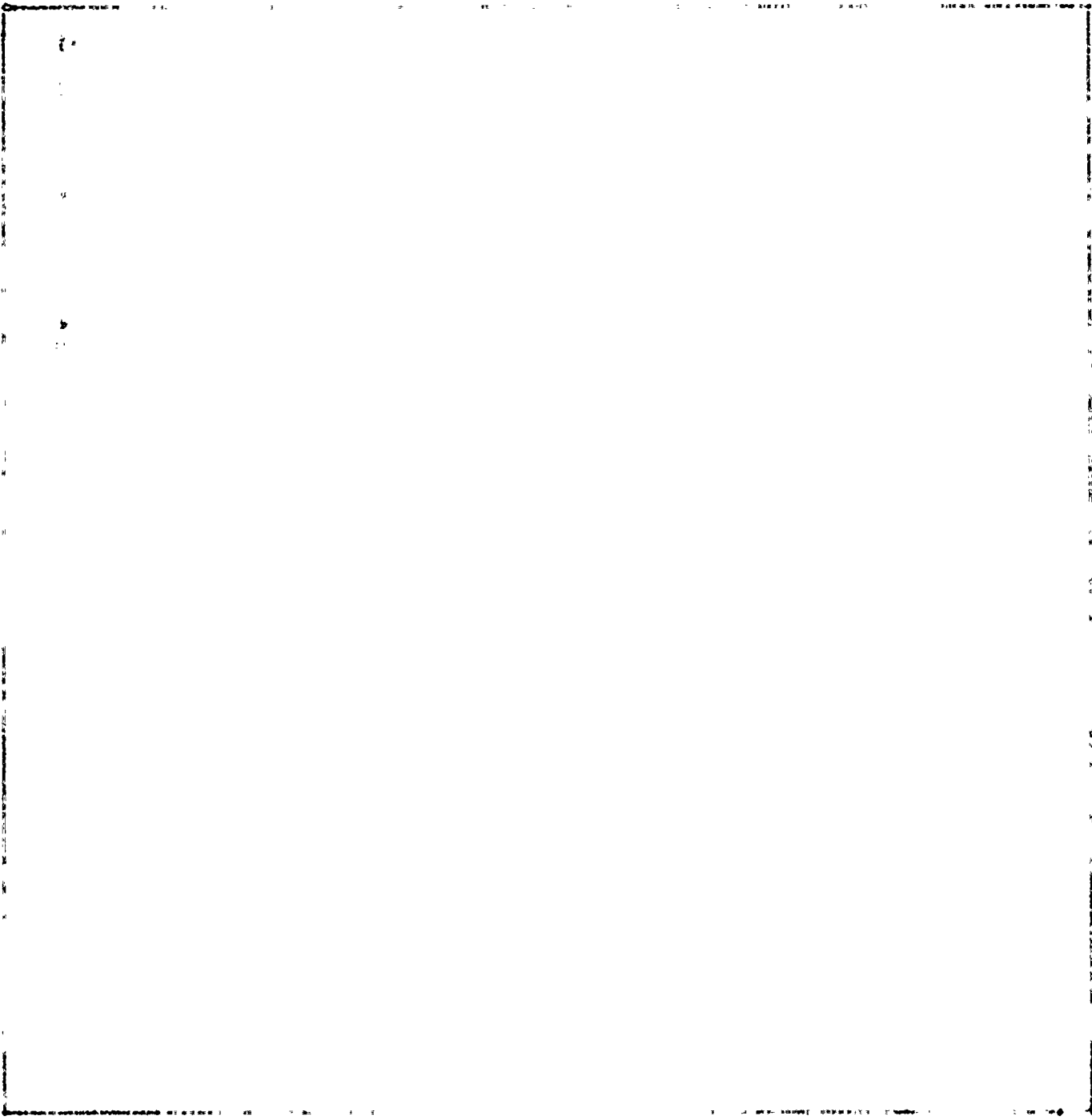
ACTION:

1. Modes 1, 2, and 3 with Pressurizer Pressure \geq 1750 psia:

 - a. With one containment spray train inoperable, restore the inoperable spray train to OPERABLE status within 72 hours and within 10 days from initial discovery of failure to meet the LCO; otherwise be in MODE 3 within the next 6 hours and in MODE 4 within the following 54 hours.
 - b. With one containment cooling train inoperable, restore the inoperable cooling train to OPERABLE status within 7 days and within 10 days from initial discovery of failure to meet the LCO; otherwise be in MODE 3 within the next 6 hours and in MODE 4 within the following 6 hours.
 - c. With one containment spray train and one containment cooling train inoperable, concurrently implement ACTIONS a. and b. The completion intervals for ACTION a. and ACTION b. shall be tracked separately for each train starting from the time each train was discovered inoperable.
 - d. With two containment cooling trains inoperable, restore one cooling train to OPERABLE status within 72 hours; otherwise be in MODE 3 within the next 6 hours and in MODE 4 within the following 6 hours.
 - e. With two containment spray trains inoperable or any combination of three or more trains inoperable, enter LCO 3.0.3 immediately.

2. Mode 3 with Pressurizer Pressure $<$ 1750 psia:

 - a. With one containment cooling train inoperable, restore the inoperable cooling train to OPERABLE status within 72 hours; otherwise be in MODE 4 within the next 6 hours.
 - b. With two containment cooling trains inoperable, enter LCO 3.0.3 immediately.



CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- c. At least once per 18 months, during shutdown, by:
1. Verifying that each automatic valve in the flow path actuates to its correct position on a CSAS test signal.
 2. Verifying that each spray pump starts automatically on a CSAS test signal.
 3. Verifying that upon a recirculation actuation signal, the containment sump isolation valves open and that a recirculation mode flow path via an OPERABLE shutdown cooling heat exchanger is established.
- d. At least once per 10 years by performing an air or smoke flow test through each spray header and verifying each spray nozzle is unobstructed.

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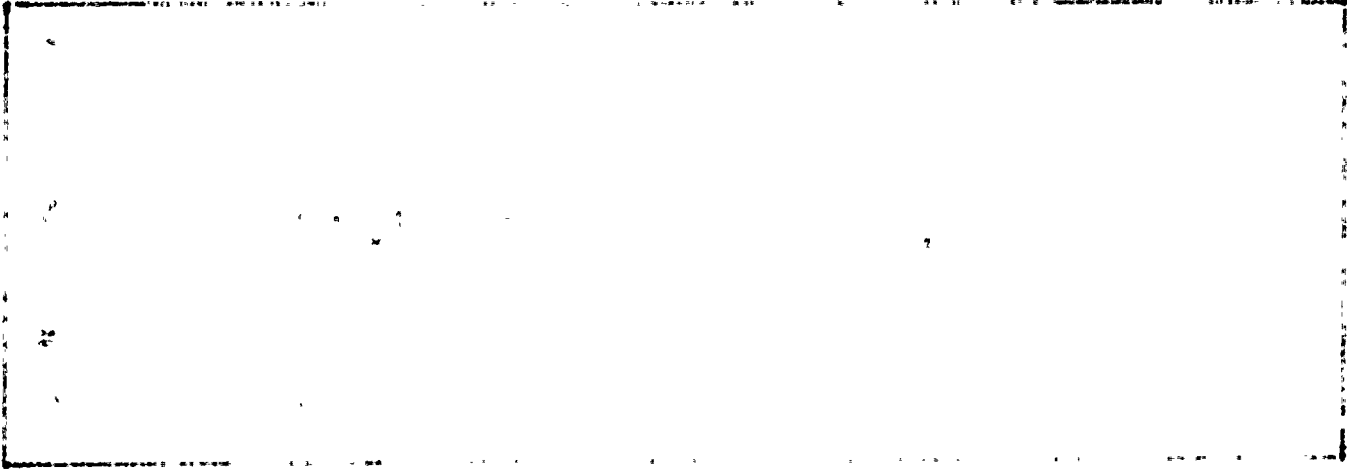
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INSERT - B

4.6.2.1.1 Each containment cooling train shall be demonstrated OPERABLE:

- a. At least once per 31 days by:
 - 1. Starting each cooling train fan unit from the control room and verifying that each unit operates for at least 15 minutes, and
 - 2. Verifying a cooling water flow rate of greater than or equal to 1200 gpm to each cooling unit.
- b. At least once per 18 months, during shutdown, by verifying that each containment cooling train starts automatically on an SIAS test signal.



CONTAINMENT SYSTEMS

CONTAINMENT COOLING SYSTEM

LIMITING CONDITION FOR OPERATION

3.6.2.3 Four containment fan coolers shall be OPERABLE.

APPLICABILITY: MODES 1, 2 and 3.

ACTION:

- a. With one containment fan cooler inoperable and both containment spray systems OPERABLE, restore the inoperable fan cooler to OPERABLE status within 30 days or be in HOT SHUTDOWN within the next 12 hours.
- b. With one containment fan cooler inoperable and one containment spray system inoperable, restore either the inoperable fan cooler or the inoperable spray system to OPERABLE status within 72 hours or be in HOT SHUTDOWN within the next 12 hours.

SURVEILLANCE REQUIREMENTS

4.6.2.3 Each containment fan cooler shall be demonstrated OPERABLE at least once per 31 days on a STAGGERED TEST BASIS by:

- a. Starting each unit from the control room,
- b. Verifying that each unit operates for at least 15 minutes, and
- c. Verifying a cooling water flow rate of ≥ 1200 gpm to each cooling unit.

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CONTAINMENT SYSTEMS

BASES

3/4.6.1.4 INTERNAL PRESSURE

The limitations on containment internal pressure ensure that 1) the containment structural is prevented from exceeding its design negative pressure differential with respect to the annulus atmosphere of 0.70 psi and 2) the containment peak pressure does not exceed the design pressure of 44 psig during steam line break accident conditions.

The maximum peak pressure obtained from a steam line break accident is 41.6 psig. The limit of 2.4 psig for initial positive containment pressure will limit the total pressure to 44.0 psig which is the design pressure and is consistent with the accident analyses.

3/4.6.1.5 AIR TEMPERATURE

The limitation on containment air temperature ensures that the containment vessel temperature does not exceed the design temperature of 264°F during LOCA conditions. The containment temperature limit is consistent with the accident analyses.

3/4.6.1.6 CONTAINMENT VESSEL STRUCTURAL INTEGRITY

This limitation ensures that the structural integrity of the containment steel vessel will be maintained comparable to the original design standards for the life of the facility. Structural integrity is required to ensure that the vessel will withstand the maximum pressure of 41.6 psig in the event of a steam line break accident. A visual inspection in conjunction with Type A leakage test is sufficient to demonstrate this capability.

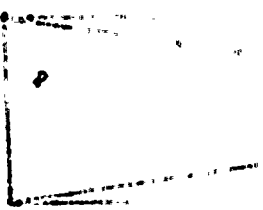
3/4.6.2 DEPRESSURIZATION AND COOLING SYSTEMS

3/4.6.2.1 CONTAINMENT SPRAY SYSTEMS ^{insert} and COOLING

~~The OPERABILITY of the containment spray system ensures that containment depressurization and cooling capability will be available in the event of a LOCA. The pressure reduction and resultant lower containment leakage rate are consistent with the assumptions used in the accident analyses.~~

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The OPERABILITY of the containment spray and cooling systems ensures that depressurization and cooling capability will be available to limit post-accident pressure and temperature in the containment to acceptable values. During a Design Basis Accident (DBA), at least two containment cooling trains or two containment spray trains, or one of each, is capable of maintaining the peak pressure and temperature within design limits. One containment spray train has the capability, in conjunction with the Spray Additive System, to remove iodine from the containment atmosphere and maintain concentrations below those assumed in the safety analyses. To ensure that these conditions can be met considering single-failure criteria, two spray trains and two cooling trains must be OPERABLE.

The 72 hour action interval specified in ACTION 1.a and ACTION 1.d, and the 7 day action interval specified in ACTION 1.b take into account the redundant heat removal capability and the iodine removal capability of the remaining operable systems, and the low probability of a DBA occurring during this period. The 10 day constraint for ACTIONS 1.a and 1.b is based on coincident entry into two ACTION conditions (specified in ACTION 1.c) coupled with the low probability of an accident occurring during this time. If the system(s) cannot be restored to OPERABLE status within the specified completion time, alternate actions are designed to bring the unit to a mode for which the LCO does not apply. The extended interval (54 hours) specified in ACTION 1.a to be in MODE 4 includes 48 hours of additional time for restoration of the inoperable CS train, and takes into consideration the reduced driving force for a release of radioactive material from the RCS when in MODE 3. With two containment spray trains or any combination of three or more containment spray and containment cooling trains inoperable in MODES 1,2, or Mode 3 with Pressurizer Pressure \geq 1750 psia, the unit is in a condition outside the accident analyses and LCO 3.0.3 must be entered immediately. In MODE 3 with Pressurizer Pressure $<$ 1750 psia, containment spray is not required.

The specifications and bases for LCO 3.6.2.1 are consistent with NUREG-1432, Revision 0 (9/28/92), Specification 3.6.6A (Containment Spray and Cooling Systems; Credit taken for iodine removal by the Containment Spray System), and the plant safety analyses.



CONTAINMENT SYSTEMS

BASES

3/4.6.2.2 SPRAY ADDITIVE SYSTEM

The OPERABILITY of the spray additive system ensures that sufficient NaOH is added to the containment spray in the event of a LOCA. The limits on NaOH volume and concentration ensure a pH value of between 8.5 and 11.0 for the solution recirculated within containment after a LOCA. This pH band minimizes the evolution of iodine and minimizes the effect of chloride and caustic stress corrosion on mechanical systems and components. The contained water volume limit includes an allowance for water not usable because of tank discharge line location or other physical characteristics. These assumptions are consistent with the iodine removal efficiency assumed in the accident analyses.

3/4.6.2.3 ~~CONTAINMENT COOLING SYSTEM~~

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~~The OPERABILITY of the containment cooling system ensures that 1) the containment air temperature will be maintained within limits during normal operation, and 2) adequate heat removal capacity is available when operated in conjunction with the containment spray systems during post-LOCA conditions.~~

3/4.6.3 CONTAINMENT ISOLATION VALVES

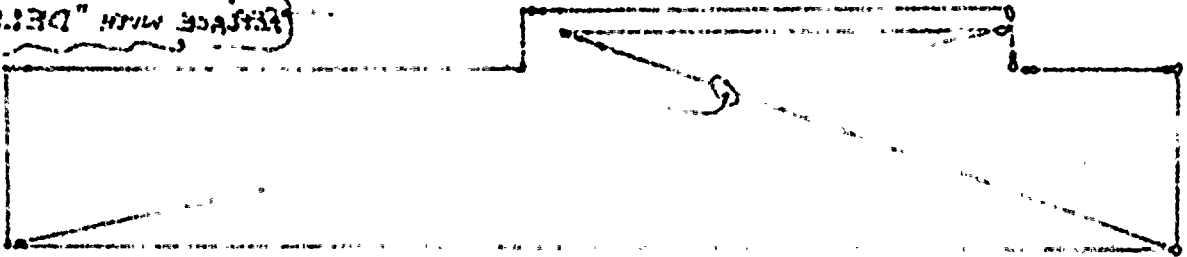
The OPERABILITY of the containment isolation valves ensures that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment. Containment isolation within the time limits specified ensures that the release of radioactive material to the environment will be consistent with the assumptions used in the analyses for a LOCA. This includes the containment purge inlet and outlet valves.

3/4.6.4 COMBUSTIBLE GAS CONTROL

The OPERABILITY of the equipment and systems required for the detection and control of hydrogen gas ensures that this equipment will be available to maintain the hydrogen concentration within containment below its flammable limit during post-LOCA conditions. Either recombiner unit is capable of controlling the expected hydrogen generation associated with 1) zirconium-water reactions, 2) radiolytic decomposition of water and 3) corrosion of metals within containment.

The containment fan coolers are used in a secondary function to ensure adequate mixing of the containment atmosphere following a LOCA. This mixing action will prevent localized accumulations of hydrogen from exceeding the flammable limit.

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Containment Spray and Cooling Systems

ATTACHMENT 4

ST. LUCIE UNIT 2 MARKED-UP TECHNICAL SPECIFICATION PAGES

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CONTAINMENT SYSTEMS

3/4.6.2 DEPRESSURIZATION AND COOLING SYSTEMS

CONTAINMENT SPRAY SYSTEM insert and COOLING

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LIMITING CONDITION FOR OPERATION

~~3.6.2.1 Two independent containment spray systems shall be OPERABLE with each spray system capable of taking suction from the RWT on a Containment Spray Actuation Signal and automatically transferring suction to the containment sump on a Sump Recirculation Actuation Signal. Each spray system flow path from the containment sump shall be via an OPERABLE shutdown cooling heat exchanger.~~

~~APPLICABILITY: MODES 1, 2, and 3*.~~

~~ACTION:~~

~~With one containment spray system inoperable, restore the inoperable spray system to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours; restore the inoperable spray system to OPERABLE status within the next 48 hours or be in COLD SHUTDOWN within the following 30 hours.~~

SURVEILLANCE REQUIREMENTS

- 4.6.2.1 Each containment spray system shall be demonstrated OPERABLE:
- a. At least once per 31 days by verifying that each valve (manual, power-operated, or automatic) in the flow path that is not locked, sealed, or otherwise secured in position, is positioned to take suction from the RWT on a Containment Pressure--High-High test signal.
 - b. By verifying, that on recirculation flow, each pump develops a discharge pressure of greater than or equal to 200 psig when tested pursuant to Specification 4.0.5.
 - c. At least once per 18 months, during shutdown, by:
 - 1. Verifying that each automatic valve in the flow path actuates to its correct position on a CSAS test signal.
 - 2. Verifying that upon a Recirculation Actuation Test Signal (RAS), the containment sump isolation valves open and that a recirculation mode flow path via an OPERABLE shutdown cooling heat exchanger is established.

~~Applicable only when pressurizer pressure is > 1750 psia.~~

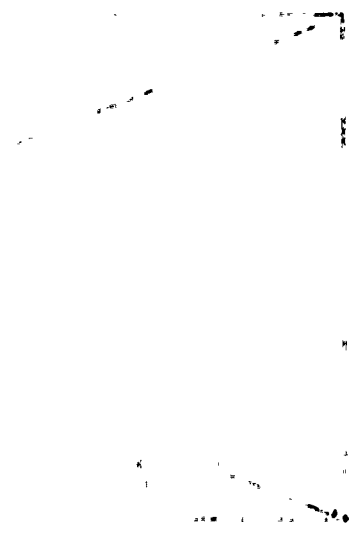
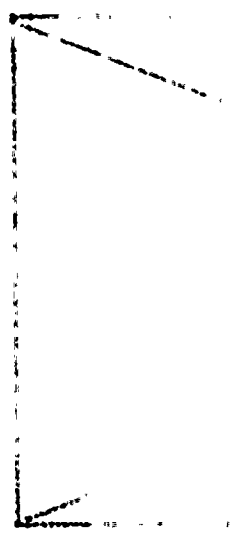
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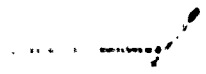
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Containment Spray and Cooling Systems

INSERT - A

3.6.2.1 Two containment spray trains and two containment cooling trains shall be OPERABLE.

APPLICABILITY: Containment Spray System: MODES 1, 2, and MODE 3 with
Pressurizer Pressure \geq 1750 psia.

Containment Cooling System: MODES 1,2, and 3.

ACTION:

1. Modes 1, 2, and 3 with Pressurizer Pressure \geq 1750 psia:

 - a. With one containment spray train inoperable, restore the inoperable spray train to OPERABLE status within 72 hours and within 10 days from initial discovery of failure to meet the LCO; otherwise be in MODE 3 within the next 6 hours and in MODE 4 within the following 54 hours.
 - b. With one containment cooling train inoperable, restore the inoperable cooling train to OPERABLE status within 7 days and within 10 days from initial discovery of failure to meet the LCO; otherwise be in MODE 3 within the next 6 hours and in MODE 4 within the following 6 hours.
 - c. With one containment spray train and one containment cooling train inoperable, concurrently implement ACTIONS a. and b. The completion intervals for ACTION a. and ACTION b. shall be tracked separately for each train starting from the time each train was discovered inoperable.
 - d. With two containment cooling trains inoperable, restore one cooling train to OPERABLE status within 72 hours; otherwise be in MODE 3 within the next 6 hours and in MODE 4 within the following 6 hours.
 - e. With two containment spray trains inoperable or any combination of three or more trains inoperable, enter LCO 3.0.3 immediately.

2. Mode 3 with Pressurizer Pressure $<$ 1750 psia:

 - a. With one containment cooling train inoperable, restore the inoperable cooling train to OPERABLE status within 72 hours; otherwise be in MODE 4 within the next 6 hours.
 - b. With two containment cooling trains inoperable, enter LCO 3.0.3 immediately



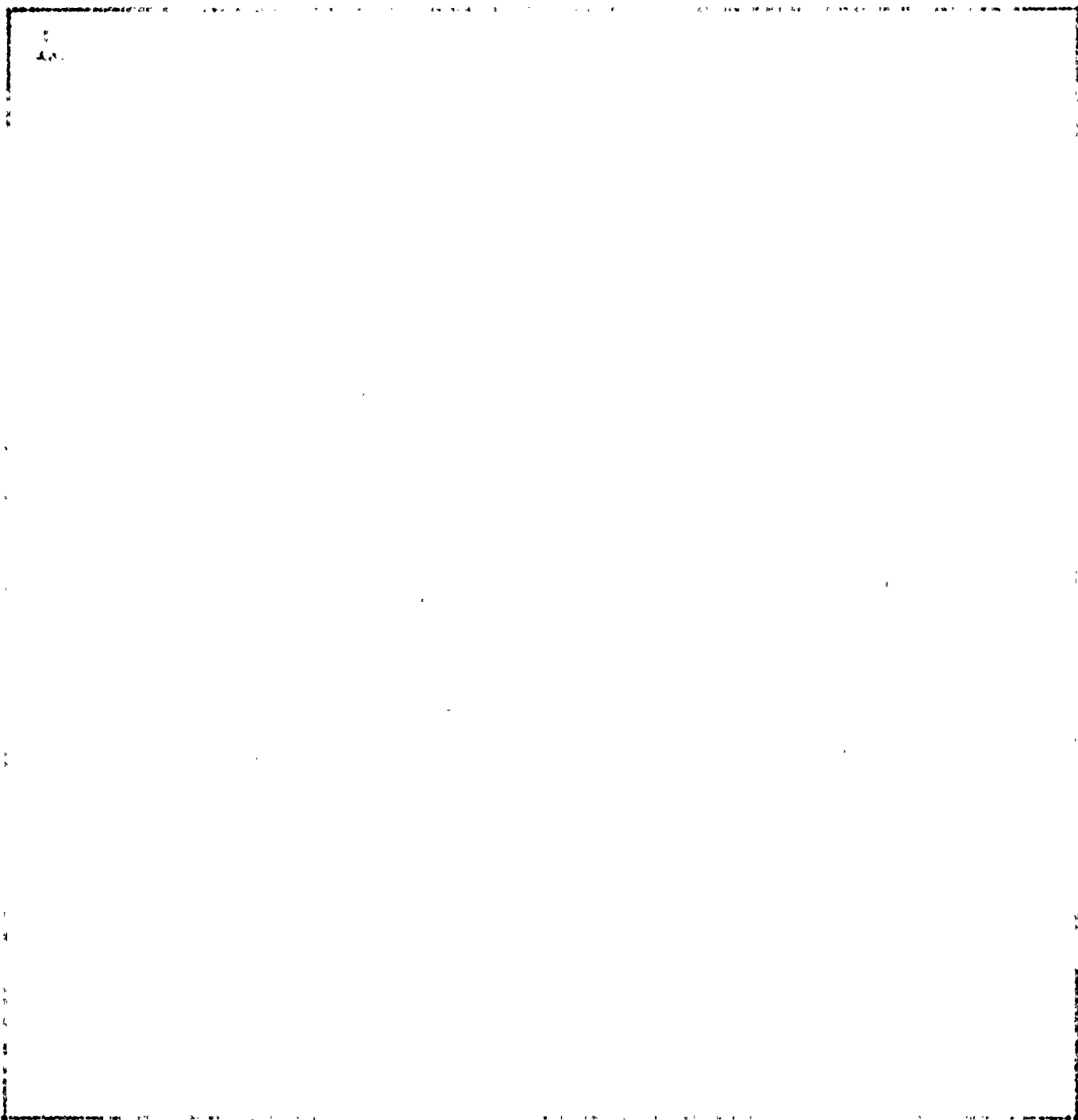
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CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

3. Verifying that each spray pump starts automatically on a CSAS test signal.
- d. At least once per 10 years by performing an air or smoke flow test through each spray header and verifying each spray nozzle is unobstructed.

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INSERT - B

4.6.2.1.1 Each containment cooling train shall be demonstrated OPERABLE:

- a. At least once per 31 days by:
 - 1. Starting each cooling train fan unit from the control room and verifying that each unit operates for at least 15 minutes, and
 - 2. Verifying a cooling water flow rate of greater than or equal to 1200 gpm to each cooling unit.
- b. At least once per 18 months, during shutdown, by verifying that each containment cooling train starts automatically on an SIAS test signal.



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CONTAINMENT SYSTEMS

CONTAINMENT COOLING SYSTEM

LIMITING CONDITION FOR OPERATION

3.6.2.3 Four independent containment fan coolers shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTION:

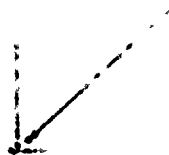
With one of the above required containment fan coolers inoperable, restore the inoperable containment fan cooler to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours; restore the inoperable containment fan cooler to OPERABLE status within the next 48 hours or be in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.2.3 Each containment fan cooler shall be demonstrated OPERABLE:

- a. At least once per 31 days by:
 1. Starting each fan cooler from the control room and verifying that each fan cooler operates for at least 15 minutes.
 2. Verifying a cooling water flow rate of greater than or equal to 1200 gpm to each fan cooler.
- b. At least once per 18 months by verifying that each fan cooler starts automatically on an SIAS test signal.

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CONTAINMENT SYSTEMS

BASES

3/4.6.1.5 AIR TEMPERATURE

The limitation on containment average air temperature ensures that the containment temperature does not exceed the design temperature of 264°F during steam line break conditions and is consistent with the safety analyses.

3/4.6.1.6 CONTAINMENT VESSEL STRUCTURAL INTEGRITY

This limitation ensures that the structural integrity of the containment steel vessel will be maintained comparable to the original design standards for the life of the facility. Structural integrity is required to ensure that the vessel will withstand the maximum pressure of 44.0 psig in the event of a steam line break accident. A visual inspection in conjunction with Type A leakage test is sufficient to demonstrate this capability.

3/4.6.1.7 CONTAINMENT VENTILATION SYSTEM

The 48-inch containment purge supply and exhaust isolation valves are required to be closed during plant operation since these valves have not been demonstrated capable of closing during a LOCA or steam line break accident. Maintaining these valves closed during plant operations ensures that excessive quantities of radioactive materials will not be released via the containment purge system. To provide assurance that the 48-inch valves cannot be inadvertently opened, they are sealed closed in accordance with Standard Review Plan 6.2.4 which includes devices to lock the valve closed, or prevent power from being supplied to the valve operator.

The use of the containment purge lines is restricted to the 8-inch purge supply and exhaust isolation valves since, unlike the 48-inch valves, the 8-inch valves will close during a LOCA or steam line break accident and therefore the site boundary dose guidelines of 10 CFR Part 100 would not be exceeded in the event of an accident during purging operations.

Leakage integrity tests with a maximum allowable leakage rate for purge supply and exhaust isolation valves will provide early indication of resilient material seal degradation and will allow the opportunity for repair before gross leakage failure develops. The 0.60 L_v leakage limit shall not be exceeded when the leakage rates determined by the leakage integrity tests of these valves are added to the previously determined total for all valves and penetrations subject to Type B and C tests.

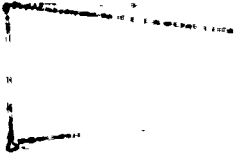
3/4.6.2 DEPRESSURIZATION AND COOLING SYSTEMS

3/4.6.2.1 CONTAINMENT SPRAY SYSTEMS ^{Insert} and COOLING

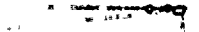
~~The OPERABILITY of the Containment Spray System ensures that containment depressurization and cooling capability will be available in the event of a LOCA. The pressure reduction and resultant lower containment leakage rate are consistent with the assumptions used in the safety analyses.~~

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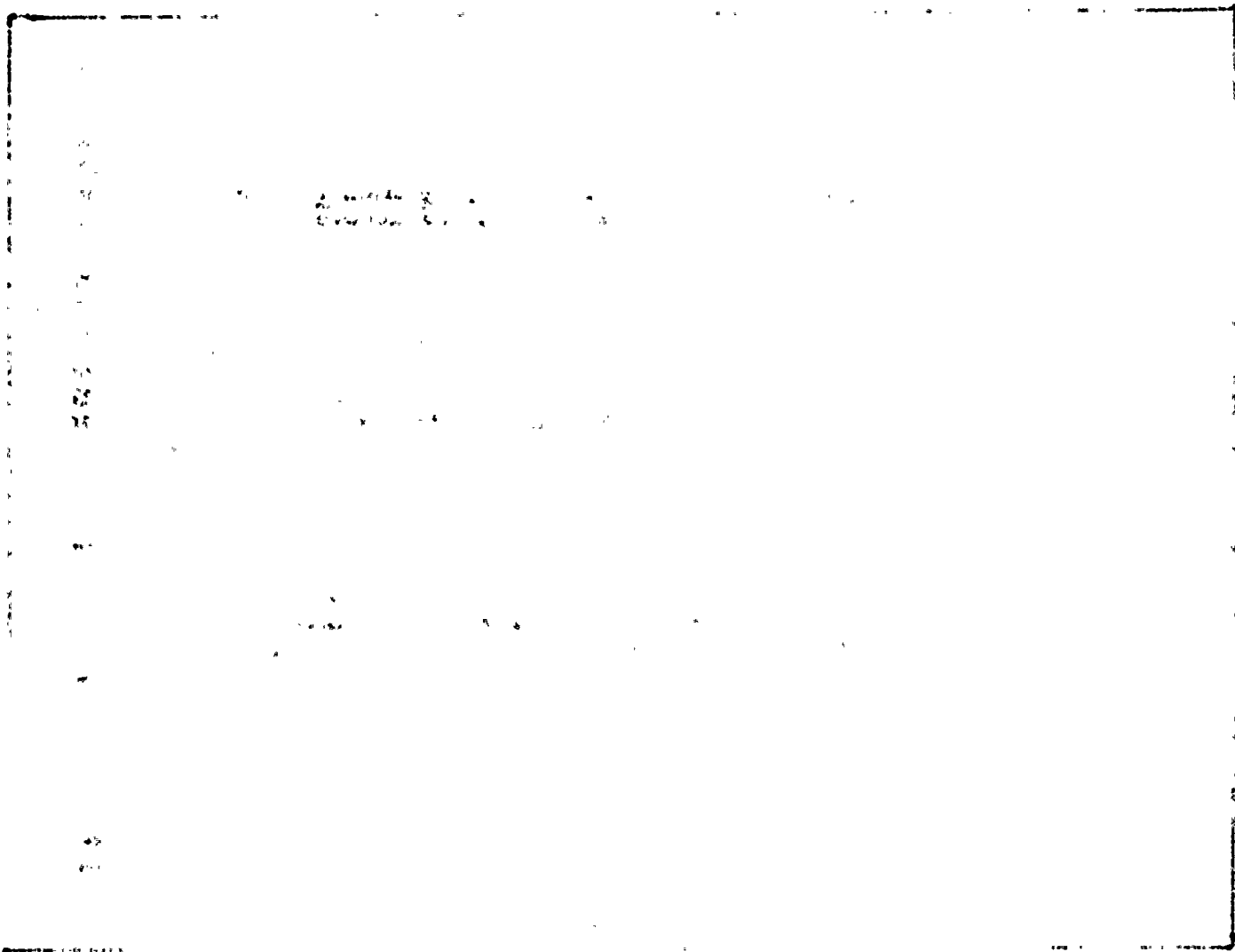
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Containment Spray and Cooling Systems

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The OPERABILITY of the containment spray and cooling systems ensures that depressurization and cooling capability will be available to limit post-accident pressure and temperature in the containment to acceptable values. During a Design Basis Accident (DBA), at least two containment cooling trains or two containment spray trains, or one of each, is capable of maintaining the peak pressure and temperature within design limits. One containment spray train has the capability, in conjunction with the Iodine Removal System, to remove iodine from the containment atmosphere and maintain concentrations below those assumed in the safety analyses. To ensure that these conditions can be met considering single-failure criteria, two spray trains and two cooling trains must be OPERABLE.

The 72 hour action interval specified in ACTION 1.a and ACTION 1.d, and the 7 day action interval specified in ACTION 1.b take into account the redundant heat removal capability and the iodine removal capability of the remaining operable systems, and the low probability of a DBA occurring during this period. The 10 day constraint for ACTIONS 1.a and 1.b is based on coincident entry into two ACTION conditions (specified in ACTION 1.c) coupled with the low probability of an accident occurring during this time. If the system(s) cannot be restored to OPERABLE status within the specified completion time, alternate actions are designed to bring the unit to a mode for which the LCO does not apply. The extended interval (54 hours) specified in ACTION 1.a to be in MODE 4 includes 48 hours of additional time for restoration of the inoperable CS train, and takes into consideration the reduced driving force for a release of radioactive material from the RCS when in MODE 3. With two containment spray trains or any combination of three or more containment spray and containment cooling trains inoperable in MODES 1,2, or Mode 3 with Pressurizer Pressure \geq 1750 psia, the unit is in a condition outside the accident analyses and LCO 3.0.3 must be entered immediately. In MODE 3 with Pressurizer Pressure $<$ 1750 psia, containment spray is not required.

The specifications and bases for LCO 3.6.2.1 are consistent with NUREG-1432, Revision 0 (9/28/92), Specification 3.6.6A (Containment Spray and Cooling Systems; Credit taken for iodine removal by the Containment Spray System), and the plant safety analyses.



CONTAINMENT SYSTEMS

BASES

CONTAINMENT SPRAY SYSTEM (Continued)

and COOLING

The Containment Spray System and the Containment Cooling System provide post-accident cooling of the containment atmosphere. However, the Containment Spray System also provides a mechanism for removing iodine from the containment atmosphere and therefore the time requirements for restoring an inoperable spray system to OPERABLE status have been maintained consistent with that assigned other inoperable ESF equipment.

3/4.6.2.2 IODINE REMOVAL SYSTEM

The OPERABILITY of the Iodine Removal System ensures that sufficient N_2H_4 is added to the containment spray in the event of a LOCA. The limits on N_2H_4 volume and concentration ensure a minimum of 50 ppm of N_2H_4 concentration available in the spray for a minimum of 6.5 hours per pump for a total of 13 hours to provide assumed iodine decontamination factors on the containment atmosphere during spray function and ensure a pH value of between 7.0 and 8.0 for the solution recirculated within containment after a LOCA. This pH band minimizes the evolution of iodine and minimizes the effect of chloride and caustic stress corrosion on mechanical systems and components. The contained water volume limit includes an allowance for water not usable because of tank discharge line location or other physical characteristics. These assumptions are consistent with the iodine removal efficiency assumed in the safety analyses.

3/4.6.2.3 CONTAINMENT COOLING SYSTEM

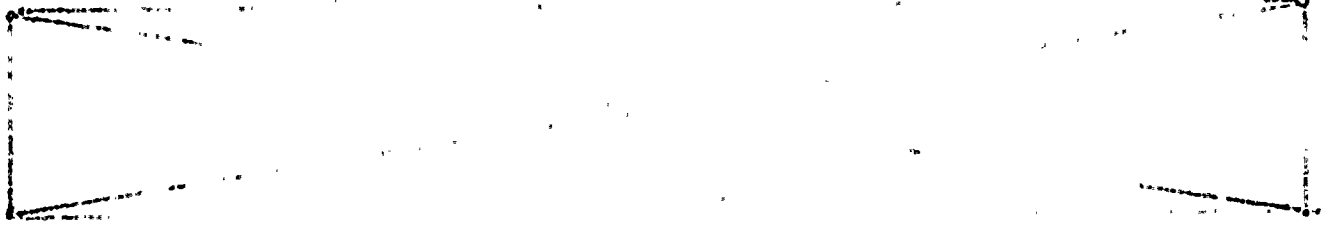
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The OPERABILITY of the Containment Cooling System ensures that (1) the containment air temperature will be maintained within limits during normal operation, and (2) adequate heat removal capacity is available when operated in conjunction with the Containment Spray Systems during post-LOCA conditions.

The Containment Cooling System and the Containment Spray System provide post-accident cooling of the containment atmosphere. As a result of this cooling capability, the allowable out-of-service time requirements for the Containment Cooling System have been appropriately adjusted. The allowable out-of-service time requirements for the Containment Spray System and Containment Cooling System have been maintained consistent with that assigned other inoperable ESF equipment since the Containment Spray System and Containment Cooling System also provide a mechanism for removing iodine from the containment atmosphere.

and cooling

2



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