

EMERGENCY CORE COOLING SYSTEMS

SURVEILLANCE REQUIREMENTS

4.5.2 Each ECCS subsystem shall be demonstrated OPERABLE:

a. At least once per 12 hours by verifying that the following valves are in the indicated positions with power to the valve operators removed:

<u>Valve Number</u>	<u>Valve Function</u>	<u>Valve Position</u>
MOV SI8806	Suction to the SI Pumps	Open
MOV SI8835	SI Pump Discharge To RCS Cold Legs	Open*
MOV SI8813	SI Pump Recirculation To The RWST	Open
MOV SI8809A	RHR Pump Discharge to RCS Cold Legs	Open*
MOV SI8809B	RHR Pump Discharge to RCS Cold Legs	Open*
MOV SI8840	RHR Pump Discharge to RCS Hot Legs	Closed
MOV SI8802A	SI Pump Discharge to RCS Hot Legs	Closed
MOV SI8802B	SI Pump Discharge to RCS Hot Legs	Closed

b. At least once per 31 days by: (applicable to idle RH and SI System only)

- 1) Venting the ~~ECCS~~ pump casings and discharge piping high points outside of containment, and *(vent valves)*
- 2) Verifying that each valve (manual, power-operated, or automatic) in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position. *(applicable to CV, RH, SI system)*

c. By a visual inspection which verifies that no loose debris (rags, trash, clothing, etc.) is present in the containment which could be transported to the containment sump and cause restriction of the pump suction during LOCA conditions. This visual inspection shall be performed:

- 3) Verifying the CV system is full of water by ultrasonically examining the discharge portion of the idle CV pump up to the discharge check valve and the stagnant portion of the piping upstream of 1 SI8801A and B at the 1 SI045 valve *(applicable to CV System only).*

*Valves may be realigned for testing pursuant to Specification 4.4.6.2.2.

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UNIT 2

EMERGENCY CORE COOLING SYSTEMS

SURVEILLANCE REQUIREMENTS

4.5.2 Each ECCS subsystem shall be demonstrated OPERABLE:

- a. At least once per 12 hours by verifying that the following valves are in the indicated positions with power to the valve operators removed:

<u>Valve Number</u>	<u>Valve Function</u>	<u>Valve Position</u>
MOV SI8806	Suction to the SI Pumps	Open
MOV SI8835	SI Pump Discharge To RCS Cold Legs	Open*
MOV SI8813	SI Pump Recirculation To The RBST	Open
MOV SI8809A	RHR Pump Discharge to RCS Cold Legs	Open*
MOV SI8809B	RHR Pump Discharge to RCS Cold Legs	Open*
MOV SI8840	RHR Pump Discharge to RCS Hot Legs	Closed
MOV SI8802A	SI Pump Discharge to RCS Hot Legs	Closed
MOV SI8802B	SI Pump Discharge to RCS Hot Legs	Closed

b. At least once per 31 days by:

- 1) Venting the ECCS pump casings and discharge piping high points outside of containment, and
- 2) Verifying that each valve (manual, power-operated, or automatic) in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position.

c. By a visual inspection which verifies that no loose debris (rags, trash, clothing, etc.) is present in the containment which could be transported to the containment sump and cause restriction of the pump suction during LOCA conditions. This visual inspection shall be performed:

*Valves may be realigned for testing pursuant to Specification 4.4.6.2.2.

EMERGENCY CORE COOLING SYSTEMS

BASES

ECCS SUBSYSTEMS (Continued)

The limitation for a maximum of one centrifugal charging pump to be OPERABLE and the Surveillance Requirement to verify all charging pumps except the required OPERABLE Charging pump to be inoperable in MODE 4 with one or more of the RCS cold legs less than or equal to 330°F, MODE 5, and MODE 6 with the reactor vessel head on, provides assurance that a mass addition pressure transient can be relieved by the operation of a single PORV or RHR suction relief valve. Similarly, the requirement to verify all Safety Injection pumps are inoperable in MODE 4 with the temperature of one or more of the RCS Cold Legs less than or equal to 330°F, in MODE 5 with pressurizer level greater than 5 percent (Level 409.5') and in MODE 6 with pressurizer level greater than 5 percent and the reactor vessel head resting on the reactor vessel flange, provides assurance that a mass addition pressure transient can be relieved by a single PORV or RHR suction relief valve.

In MODE 5 and MODE 6 with pressurizer level less than or equal to 5 percent, at least one Safety Injection pump or gravity feed from the RWST must be available to mitigate the effects of a loss of decay heat removal during partially drained conditions. Surveillance requirements assure availability, but prevent inadvertent actuation during these modes. The desired flow path for the SI pump or gravity feed varies with RCS configuration and is, therefore, procedurally addressed.

The Surveillance Requirements define what constitutes an adequate hot side vent for various plant conditions. It was determined that removing the reactor vessel head was an adequate vent under all conditions. Other venting alternatives have restrictions based on time from shutdown and RCS temperature. The values in the surveillance were taken from the graph on the following page.

The Surveillance Requirements provided to ensure OPERABILITY of each component ensures that at a minimum, the assumptions used in the safety analyses are met and that subsystem OPERABILITY is maintained. Surveillance Requirements for throttle valve position stops and flow balance testing provide assurance that proper ECCS flows will be maintained in the event of a LOCA. Maintenance of proper flow resistance and pressure drop in the piping system to each injection point is necessary to: (1) prevent total pump flow from exceeding runout conditions when the system is in its minimum resistance configuration, (2) provide the proper flow split between injection points in accordance with the assumptions used in the ECCS-LOCA analyses, and (3) provide an acceptable level of total ECCS flow to all injection points equal to or above that assumed in the ECCS-LOCA analyses. The Surveillance Requirements for leakage testing of ECCS check valves ensures that a failure of one valve will not cause an intersystem LOCA. In Mode 3, with pressurizer pressure below 1000 psig, the accumulators will be available with their isolation valves either closed but energized, or open, whenever a SI8809 valve is closed to perform check valve leakage testing.

INSERT A

INSERT A

For Unit 1, Surveillance Requirement 4.5.2.b.1 requires that the ECCS pump casings and discharge piping high points equipped with vent valves be vented on a 31 day frequency. This venting surveillance does not apply to subsystems in communication with operating systems because the flows and/or pressures prevalent in these systems are sufficient to provide confidence that voiding which could result in unacceptable dynamic loadings will not occur. During normal operation, this exclusion would apply to the High Head Safety Injection subsystem. During shutdown cooling operation, the exclusion would apply to the single required Centrifugal Charging pump and operating RH pump, in addition to the ECCS piping in communication with the operating pumps. Because the centrifugal charging pumps are not equipped with pump casing vent valves, and the pump design and system piping configuration allow the pumps to be maintained under positive pressure when in standby, manual venting of these pumps is not required.

The surveillance requirement to ultrasonically examine selected portions of piping involves the idle CV pump discharge piping up to the first check valve on the pump discharge and miniflow lines, and the stagnant portion of the piping upstream of the ISI8801A/B adjacent to the vent valve ISI045. This will provide added assurance that the piping is water solid.

ATTACHMENT C

EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATIONS FOR PROPOSED CHANGES TO APPENDIX A TECHNICAL SPECIFICATIONS OF FACILITY OPERATING LICENSE NPF-72

Commonwealth Edison has evaluated this proposed amendment and determined that it involves no significant hazards considerations. According to Title 10 Code of Federal Regulations Section 50 Subsection 92 Paragraph c (10 CFR 50.92 (c)), a proposed amendment to an operating license involves no significant hazards considerations if operation of the facility in accordance with the proposed amendment would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated, or
2. Create the possibility of a new or different kind of accident from any accident previously evaluated, or
3. Involve a significant reduction in a margin of safety.

A. INTRODUCTION

Commonwealth Edison (ComEd) proposes to revise Braidwood Technical Specification (TS) 4.5.2.b.1 and associated bases as it relates to the requirement to vent the Emergency Core Cooling Systems (ECCS) pump casings and discharge piping high points. The change will revise the venting requirement to encompass the non-operating ECCS pumps and discharge piping which are provided with high point vent valves. Those portions of the ECCS systems which are in communication with operating system pressure and/or flow would not be required to be vented. This would normally encompass the High Head Safety Injection (CV) subsystem during Modes 1-4 operation, and the Low Head Safety Injection Subsystem (RH) during periods when shutdown cooling is in operation. Additionally, the wording of the surveillance will be revised to clearly indicate that the installed high point vent valves and pump casing vent valves will be utilized to accomplish the venting operation. The Intermediate Head Safety Injection (SI) subsystem and the RH subsystem are equipped with pump casing vents. The centrifugal CV pumps are not equipped with pump casing vent valves due to the configuration of the suction and discharge piping. Both the suction and discharge piping enter the pump casing from the top, so the pumps are essentially self-venting. Finally, a new requirement is added to ultrasonically examine the discharge piping of the idle centrifugal charging pump and the portion

of the piping upstream of the High Head Safety Injection isolation valves (1SI8801A&B) adjacent to the vent valve 1SI045 on a monthly basis. These changes are required to align the surveillance requirement with the physical construction of the installed piping, and accommodate operating conditions which preclude cycling of the installed high point vent valve during system operation.

B. NO SIGNIFICANT HAZARDS ANALYSIS

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The changes proposed in this request will align the surveillance requirements with the installed system design and normal operating conditions. No increase in the probability of an accident will occur as a result of this change. The conduct of surveillances required by the Technical Specifications are not postulated to result in accident initiation. The level of surveillance performed to date has provided confidence that the objective of the current surveillance requirement has been met. Ultrasonic examinations of CV piping which had not been manually vented show that the affected piping is water solid. The design of the pumps and installed piping configuration are such that the standby pump is maintained under a positive pressure. Evaluations previously performed in support of Amendment 36 confirmed that hydrogen introduced into the VCT will not come out of solution in the CV pump suction line. Experience with performing the manual venting for all ECCS subsystems to date has not resulted in the identification of significant voiding. This was verified by a search of the station's Problem Identification database. The applicable surveillance procedure for performing the venting requires that a Problem Identification Form be generated if significant voiding is experienced. No such problems have been identified. As such, the proposed change does not result in a significant increase in the probability of occurrence of a previously analyzed accident.

The consequences of a previously analyzed accident are not increased. Operating experience has shown that the level of surveillance performed to date is sufficient to provide confidence that no significant voiding has occurred in the affected piping. Ultrasonic examinations have confirmed the water solid condition of the piping. Even though voiding is not expected, evaluation of postulated voided conditions confirm that unacceptable dynamic loading would not occur, and therefore the integrity of the ECCS piping is not compromised. Thus, the ECCS will be capable of performing its design function. This will ensure that the consequences of a previously analyzed accident are not significantly increased.

Therefore, these proposed revisions do not result in a significant increase in the probability or consequences of an accident previously analyzed.

2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

These proposed changes do not create the possibility of a new or different kind of accident. ComEd has evaluated the piping configuration for the ECCS discharge piping of the ECCS subsystems. First, adequate controls have been implemented to provide assurance that air intrusion is unlikely. Second, a specific evaluation of both a voided 2" and 8" RH line was performed. This evaluation concluded that the piping can withstand the dynamic loads caused by the maximum credible air void. Due to the higher pressure rating and smaller size of the SI and CV discharge piping, this evaluation is considered bounding for the ECCS subsystems. The results of the evaluation were submitted for staff review in a letter dated March 12, 1990, in support of Amendment 36 to the Braidwood Technical Specifications. This change will not result in new failure modes because no new equipment is installed, and installed equipment is not operated in a new or different manner. Manual venting operations have been performed as permitted by system operation and piping configuration. Accordingly, this change will not create the possibility of a new or different kind of accident.

3. The proposed change does not involve a significant reduction in a margin of safety.

The margin of safety is not significantly reduced because the proposed change will provide sufficient assurance that excessive voiding will not occur. This will assure proper system functioning. Venting of the idle subsystems in conjunction with the operating conditions of the subsystems in operation provide confidence that voiding is not present. This has been confirmed by the performance of ultrasonic examinations of the piping of interest. This meets the objective of the surveillance requirement and thus preserves the margin of safety.

Therefore, based on the above evaluation, ComEd has concluded that these changes involve no significant hazards considerations.

ATTACHMENT D

ENVIRONMENTAL ASSESSMENT FOR PROPOSED CHANGES TO APPENDIX A TECHNICAL SPECIFICATIONS OF FACILITY OPERATING LICENSE NPF-72

Commonwealth Edison Company (ComEd) has evaluated this proposed license amendment request against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with Title 10, Code of Federal Regulations, Part 51, Section 21 (10 CFR 51.21). ComEd has determined that this proposed license amendment request meets the criteria for a categorical exclusion set forth in 10 CFR 51.22(c)(9). This determination is based upon the following:

1. The proposed licensing action involves the issuance of an amendment to a license for a reactor pursuant to 10 CFR 50 which changes a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or which changes an inspection or a surveillance requirement. This proposed license amendment request will allow ComEd to take credit for system operation and pressurization to meet the venting requirements for active ECCS subsystems. Non-operating subsystems will continue to be manually vented using installed vent valves;
2. this proposed license amendment request involves no significant hazards considerations;
3. there is no significant change in the types or significant increase in the amounts of any effluent that may be released offsite; and
4. there is no significant increase in individual or cumulative occupational radiation exposure.

Therefore, pursuant to 10 CFR 51.22(b), neither an environmental impact statement nor an environmental assessment is necessary for this proposed license amendment request.