Southern Nuclear

Cheryl A. Gayheart
Regulatory Affairs Director

3535 Colonnade Parkway
Birmingham, AL 35243
205 992 5316

cagayhea@southernco.com

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10 CFR 50.90

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U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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Joseph M. Farley Nuclear Plant; Units 1 and 2
Edwin I. Hatch Nuclear Plant; Units 1 and 2
Vogtle Electric Generating Plant; Units 1 and 2
License Amendment Request to Revise
Technical Specifications to Adopt TSTF-541, Revision 2, "Add Exceptions to Surveillance Requirements for Valves and Dampers Locked in the Actuated Position"

Ladies and Gentlemen:

Pursuant to 10 CFR 50.90, Southern Nuclear Operating Company (SNC) is submitting a request for an amendment to the Technical Specifications (TS) for Joseph M. Farley Nuclear Plant (FNP), Units 1 and 2, Edwin I. Hatch Nuclear Plant (HNP), Units 1 and 2, and Vogtle Electric Generating Plant (VEGP), Units 1 and 2.

SNC requests adoption of TSTF-541, "Add Exceptions to Surveillance Requirements for Valves and Dampers Locked in the Actuated Position," which is an approved change to the Standard Technical Specifications (STS), into the FNP Units 1 and 2, HNP Units 1 and 2, and VEGP Units 1 and 2 Technical Specifications (TS). The proposed amendment modifies certain TS Surveillance Requirements (SRs) by adding exceptions to consider the SR met when automatic valves or dampers are locked, sealed, or otherwise secured in the actuated position, in order to consider the SR met. Securing the automatic valve or damper in the actuated position may affect the operability of the system or any supported systems. The associated Limiting Condition for Operation (LCO) is met if the subject structure, system or component (SSC) remains operable (i.e., capable of performing its specified safety function).

The enclosure provides a description and assessment of the proposed changes. Attachments 1a, 1b, and 1c provide the existing TS pages marked up to show the proposed changes. Attachments 2a, 2b, and 2c provide revised (clean) TS pages. Attachments 3a, 3b, and 3c provide existing TS Bases pages marked to show the proposed changes for information only.

SNC requests that the amendment be reviewed under the Consolidated Line Item Improvement Process (CLIIP). Approval of the proposed amendment is requested by April 30, 2021. Once approved, the amendment shall be implemented within 90 days.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated Alabama and Georgia Official.

This letter contains no NRC commitments. If you should have any questions regarding this submittal, please contact Jamie Coleman at 205.992.6611.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 30th day of October, 2020.

Respectfully submitted,

Cheryl A. Gayheart
Regulatory Affairs Director

CAG/DSP/scm

Enclosure: 1. Description and Assessment

Attachments:
1a. FNP Proposed Technical Specification Changes (Mark-Up)
1b. HNP Proposed Technical Specification Changes (Mark-Up)
1c. VEGP Proposed Technical Specification Changes (Mark-Up)
2a. FNP Revised Technical Specification Pages
2b. HNP Revised Technical Specification Pages
2c. VEGP Revised Technical Specification Pages
3a. FNP Proposed Technical Specification Bases Changes (Mark-Up) for Information Only
3b. HNP Proposed Technical Specification Bases Changes (Mark-Up) for Information Only
3c. VEGP Proposed Technical Specification Bases Changes (Mark-Up) for Information Only

cc: Regional Administrator, Region ll
NRR Project Manager – Farley, Hatch, Vogtle 1 & 2
Senior Resident Inspector – Farley, Hatch, Vogtle 1 & 2
Director, Alabama Office of Radiation Control
Director, Environmental Protection Division - State of Georgia
RType: CGA02.001

Joseph M. Farley Nuclear Plant, Units 1 and 2
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Enclosure 1

Description and Assessment

1.0 DESCRIPTION

Southern Nuclear Operating Company (SNC) requests adoption of TSTF-541, "Add Exceptions to Surveillance Requirements for Valves and Dampers Locked in the Actuated Position," which is an approved change to the Standard Technical Specifications (STS), into the Joseph M. Farley Nuclear Plant (FNP), Units 1 and 2, Edwin I. Hatch Nuclear Plant (HNP), Units 1 and 2, and Vogtle Electric Generating Plant (VEGP), Units 1 and 2 Technical Specifications (TS). The proposed amendment modifies the TS Surveillance Requirements (SRs) by adding exceptions to consider the SR met when automatic valves or dampers are locked, sealed, or otherwise secured in the actuated position, in order to consider the SR met. Securing the automatic valve or damper in the actuated position may affect the operability of the system or of any supported systems. The associated Limiting Condition for Operation (LCO) is met if the subject structure, system or component (SSC) remains operable (i.e., capable of performing its specified safety function). The following SRs are affected by the proposed change.

FNP Units 1 and 2 Technical Specification SRs

- TS 3.7.10, “Control Room Emergency Filtration/Pressurization System (CREFS)”
- TS 3.7.12, “Penetration Room Filtration (PRF) System”

HNP Units 1 and 2 Technical Specification SRs

- TS 3.5.1, “[Emergency Core Cooling Systems] ECCS - Operating”
- TS 3.5.2, “Reactor Pressure Vessel (RPV) Water Inventory Control”
- TS 3.5.3, “[Reactor Core Isolation Cooling] RCIC System”
- TS 3.6.4.3, “Standby Gas Treatment (SGT) System”
- TS 3.7.2, “Plant Service Water (PSW) System and Ultimate Heat Sink (UHS)”
- TS 3.7.4, “Main Control Room Environmental Control (MCREC) System”

VEGP Units 1 and 2 Technical Specification SRs

- TS 3.7.10, “Control Room Emergency Filtration System (CREFS) - Both Units Operating”
- TS 3.7.13, “Piping Penetration Area Filtration and Exhaust System (PPAFES)”

While the proposed exceptions permit automatic valves and dampers that are locked, sealed, or otherwise secured in the actuated position to be excluded from the SR in order to consider the SR met, the proposed changes will not permit a system that is made inoperable by locking, sealing, or otherwise securing an automatic valve or damper in the actuated position to be considered operable. As stated in the FNP, HNP and VEGP SR 3.0.1 Bases, "Nothing in this Specification, however, is to be construed as implying that systems or components are OPERABLE when: a. The systems or components are known to be inoperable, although still meeting the SRs."

2.0 ASSESSMENT

2.1 Applicability of Safety Evaluation

SNC has reviewed the safety evaluation for TSTF-541 provided to the Technical Specifications Task Force in a letter dated December 10, 2019. This review included a review of the NRC staff’s evaluation, as well as the information provided in TSTF-541. As described herein, SNC has concluded that the justifications presented in TSTF-541 and the safety evaluation prepared by the NRC staff are applicable to FNP Units 1 and 2, HNP Units 1 and 2, and VEGP Units 1

and 2, and justify this amendment for the incorporation of the changes to the FNP, HNP and VEGP TS.

SNC acknowledges that under the proposed change, the affected valves and dampers may be excluded from the SR when locked, sealed or otherwise secured in the actuated position. However, if the safety analysis assumes movement from the actuated position following an event, or the system is rendered inoperable by locking, sealing, or otherwise securing the valve or damper in the actuated position, then the system cannot perform its specified safety function and is inoperable regardless of whether the SR is met.

SNC acknowledges for components for which the SR allowance can be utilized, the SR must be verified to have been met within its required Frequency after removing the valve or damper from the locked, sealed or otherwise secured status. If the SR exception is utilized to not test the actuation of a valve or damper and the specified Frequency of the SR is exceeded without testing the component, the SR must be performed on the component when it is returned to service in order to meet the SR.

2.2 Variations

SNC is proposing the following variations from the TS changes described in TSTF-541 or the applicable parts of the NRC staff's safety evaluation:

VEGP Unit 1 and Unit 2 TS Variations

The VEGP Unit 1 and Unit 2 TS utilize different numbering and titles than the STS on which TSTF-541 was based. The following table lists the differences. These differences are administrative and do not affect the applicability of TSTF-541 to the VEGP TS.

TSTF-541 SR	**TS Title**	**Equivalent VEGP SR**	**Equivalent VEGP TS Title**
SR 3.7.10.3	Control Room Emergency Filtration System (CREFS)	SR 3.7.10.4	Control Room Emergency Filtration System (CREFS) - Both Units Operating
SR 3.7.14.3	Penetration Room Exhaust Air Cleanup System (PREACS)	SR 3.7.14.3	Piping Penetration Area Filtration and Exhaust System (PPAFES)

The VEGP Unit 1 and Unit 2 TS contain requirements that differ from the STS on which TSTF-541 was based, but these differences do not affect the applicability of the TSTF-541 justification. Specifically, VEGP Unit 1 and Unit 2 TS do not contain SRs equivalent to the following SRs affected by TSTF-541:

- SR 3.6.11.3, "Iodine Cleanup System (ICS)"
- SR 3.6.11.4, "Iodine Cleanup System (ICS)"
- SR 3.6.13.3, "Shield Building Air Cleanup System (SBACS) (Dual and Ice Condenser)"
- SR 3.6.13.4, "Shield Building Air Cleanup System (SBACS) (Dual and Ice Condenser)"
- SR 3.7.12.3, "ECCS Penetration Room Exhaust Air Cleanup System (ECCS PREACS)"
- SR 3.7.12.5, "ECCS Penetration Room Exhaust Air Cleanup System (ECCS PREACS)"
- SR 3.7.13.3, "Fuel Building Air Cleanup System (FBACS)"
- SR 3.7.13.5, "Fuel Building Air Cleanup System (FBACS)"

- SR 3.7.14.5, “Penetration Room Exhaust Air Cleanup System (PREACS)”

The VEGP TS contain a Surveillance Frequency Control Program. Therefore, the Frequency for the affected SRs is “In accordance with the Surveillance Frequency Control Program.” This has no effect on the applicability of the proposed change.

FNP Unit 1 and Unit 2 TS Variations

The FNP Unit 1 and Unit 2 TS utilize different numbering and titles than the STS on which TSTF-541 was based. The following table lists the differences. These differences are administrative and do not affect the applicability of TSTF-541 to the FNP TS.

TSTF-541 SR	**TS Title**	**Equivalent FNP SR**	**Equivalent FNP TS Title**
SR 3.7.10.3	Control Room Emergency Filtration System (CREFS)	SR 3.7.10.3	Control Room Emergency Filtration/Pressurization System (CREFS)
SR 3.7.13.3	Fuel Building Air Cleanup System (FBACS)	SR 3.7.12.4*	Penetration Room Filtration (PRF) System

* The function of the STS ECCS PREACS and STS PREACS are accomplished at FNP by the Penetration Room Filtration (PRF) system. However, this FNP system also provides filtration for the spent fuel storage pool in the event of a fuel handling accident and is required operable during fuel movement as well as modes 1-4. The STS FBACS TS requirements more closely match the FNP design and licensing basis and were used as the reference for the FNP PRF system in the conversion to the Improved Technical Specifications (ITS). Therefore, FNP Unit 1 and Unit 2 TS, SR 3.7.12.4, “Verify each PRF train actuates and the normal spent fuel pool room ventilation system isolates on an actual or simulated actuation signal,” contains additional requirements as compared to 3.7.13.3 from NUREG-1431 Revision 4 to reflect the plant design. This variation does not affect the applicability of TSTF-541 to FNP SR 3.7.12.4.

The FNP Unit 1 and Unit 2 TS contain requirements that differ from the STS on which TSTF-541 was based, but these differences do not affect the applicability of the TSTF-541 justification. Specifically, FNP Unit 1 and Unit 2 do not contain SRs equivalent to the following SRs affected by TSTF-541:

- SR 3.6.11.3, “Iodine Cleanup System (ICS)”
- SR 3.6.11.4, “Iodine Cleanup System (ICS)”
- SR 3.6.13.3, “Shield Building Air Cleanup System (SBACS) (Dual and Ice Condenser)”
- SR 3.6.13.4, “Shield Building Air Cleanup System (SBACS) (Dual and Ice Condenser)”
- SR 3.7.12.3, “Emergency Core Cooling System (ECCS) Pump Room Exhaust Air Cleanup System (ECCS PREACS)”
- SR 3.7.12.5, “Emergency Core Cooling System (ECCS) Pump Room Exhaust Air Cleanup System (ECCS PREACS)”
- SR 3.7.13.5, “Fuel Building Air Cleanup System (FBACS)”
- SR 3.7.14.3, “Penetration Room Exhaust Air Cleanup System (PREACS)”
- SR 3.7.14.5, “Penetration Room Exhaust Air Cleanup System (PREACS)”

The FNP TS contain a Surveillance Frequency Control Program. Therefore, the Frequency for the affected SRs is “In accordance with the Surveillance Frequency Control Program.” This has no effect on the applicability of the proposed change.

HNP Unit 1 and Unit 2 TS Variations

The HNP Unit 1 and Unit 2 TS utilize different numbering than the STS on which TSTF-541 was based. Specifically, SR 3.7.2.6, "Plant Service Water (PSW) System and Ultimate Heat Sink (UHS)," is numbered SR 3.7.2.3 in the HNP Unit 1 and Unit 2 TS.

The HNP Unit 1 and Unit 2 TS have incorporated TSTF-542, Revision 2, "Reactor Pressure Vessel Water Inventory Control," which had not been incorporated into the standard TS on which TSTF-541 was based. The changes in TSTF-541 are equally applicable to new SR 3.5.2.7 added by TSTF-542. Therefore, the TSTF-541 allowance is added to this SR.

The HNP Unit 1 and Unit 2 TS contain requirements that differ from the STS on which TSTF-541 was based, but these differences do not affect the applicability of the TSTF-541 justification. Specifically, HNP Unit 1 and Unit 2 TS do not have an SR equivalent to SR 3.6.4.3.4, to verify each SGT filter cooler bypass damper can be opened and the fan started, so the changes to SR 3.6.4.3.4 described in TSTF-541 are not applicable to the HNP Unit 1 and Unit 2 TS.

The HNP TS contain a Surveillance Frequency Control Program. Therefore, the Frequency for the affected SRs is “In accordance with the Surveillance Frequency Control Program.” This has no effect on the applicability of the proposed change.

2.3 Licensee Verifications

SNC confirms that existing administrative processes, such as the Corrective Action Program, Operability Determination process, the maintenance, design control, configuration control, and operating procedures, etc., will be used to assess the operability of the system or of any supported systems when utilizing the SR allowances, which includes consideration of whether movement of the affected valves or dampers following an event is assumed in the safety analysis.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Determination

SNC requests adoption of TSTF-541, "Add Exceptions to Surveillance Requirements for Valves and Dampers Locked in the Actuated Position," which is an approved change to the Standard Technical Specifications (STS), into the FNP Units 1 and 2, HNP Units 1 and 2, and VEGP Units 1 and 2 Technical Specifications (TS). The proposed amendment modifies the TS Surveillance Requirements (SRs) by adding exceptions to consider the SR met when automatic valves or dampers are locked, sealed, or otherwise secured in the actuated position, in order to consider the SR met. Securing the automatic valve or damper in the actuated position may affect the operability of the system or of any supported systems. The associated Limiting Condition for Operation (LCO) is met if the subject structure, system or component (SSC) remains operable (i.e., capable of performing its specified safety function).

SNC has evaluated whether or not a significant hazards consideration is involved with the proposed amendment(s) by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No

   The proposed change revises SRs by adding exceptions excluding from actuation and isolation time testing those valves and dampers that are locked, sealed or otherwise secured in the actuated position. The performance or lack of performance of SRs is not an initiator of any accident previously evaluated. As a result, the proposed change has no effect on the probability of any accident previously evaluated. The proposed change excludes performance of portions of certain SRs, but the SSC must still be capable of performing the safety functions assumed in the accident analysis. Otherwise, the SSC is inoperable, and the associated TS Actions are followed. As a result, the SSCs continue to perform their mitigating functions and the consequences of any accident previously evaluated are not affected.

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

2. Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

   Response: No

   The proposed change revises SRs by adding exceptions excluding from actuation and isolation time testing those valves and dampers that are locked, sealed or otherwise secured in the actuated position. The proposed change will not change the design function or operability requirements of the affected SSCs. The SSC must still be capable of performing the safety functions assumed in the accident analysis or the SSC is inoperable, and the associated TS Actions are followed. The proposed change does not create any credible new failure mechanisms, malfunctions, or accident initiators not considered in the design and licensing bases.

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

3. Does the proposed amendment involve a significant reduction in a margin of safety?

   Response: No

   The proposed change revises SRs by adding exceptions excluding from actuation and isolation time testing those valves and dampers that are locked, sealed or otherwise secured in the actuated position. The proposed change does not alter the manner in which safety limits, limiting safety system settings or limiting conditions for operation are determined. The safety analysis assumptions and acceptance criteria are not affected by this change.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, SNC concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

3.2 Conclusion

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

4. ENVIRONMENTAL CONSIDERATION

The proposed change would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed change does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed change.

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Attachment 1a

FNP Proposed Technical Specification Changes (Mark-Up)

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.10.3	----------NOTE---------- Not required to be performed in MODES 5 and 6. ---------- Verify each CREFS train actuates on an actual or simulated actuation signal*, except for dampers and valves that are locked, sealed, or otherwise secured in the actuated position.*	In accordance with the Surveillance Frequency Control Program
SR 3.7.10.4	Perform required CRE unfiltered air inleakage testing in accordance with the Control Room Envelope Habitability Program.	In accordance with the Control Room Envelope Habitability Program

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. Two PRF trains inoperable during movement of recently irradiated fuel assemblies in the SFPR.	E.1 Suspend movement of recently irradiated fuel assemblies in the SFPR.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.12.1	----------NOTE---------- Only required to be met during movement of recently irradiated fuel assemblies in the SFPR. ---------- Verify two PRF trains aligned to the SFPR.	In accordance with the Surveillance Frequency Control Program
SR 3.7.12.2	Operate each PRF train for ≥ 15 minutes in the applicable mode of operation (post LOCA and/or refueling accident).	In accordance with the Surveillance Frequency Control Program
SR 3.7.12.3	Perform required PRF filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.7.12.4	Verify each PRF train actuates and the normal spent fuel pool room ventilation system isolates on an actual or simulated actuation signal*, except for dampers and valves that are locked, sealed, or otherwise secured in the actuated position*.	In accordance with the Surveillance Frequency Control Program
SR 3.7.12.5	Verify one PRF train can maintain a pressure ≤ -0.125 inches water gauge with respect to adjacent areas during the post LOCA mode of operation at a flow rate ≤ 5500 cfm.	In accordance with the Surveillance Frequency Control Program
SR 3.7.12.6	Verify one PRF train can maintain a slightly negative pressure with respect to adjacent areas during the fuel handling accident mode of operation at a flow rate ≤ 5500 cfm.	In accordance with the Surveillance Frequency Control Program

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Attachment 1b

HNP Proposed Technical Specification Changes (Mark-Up)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.5.1.9	----------NOTE---------- Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. ---------- Verify, with reactor pressure ≤ 165 psig, the HPCI pump can develop a flow rate ≥ 4250 gpm against a system head corresponding to reactor system pressure.	In accordance with the Surveillance Frequency Control Program
SR 3.5.1.10	----------NOTE---------- Vessel injection/spray may be excluded. ---------- Verify each ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal*, except for valves that are locked, sealed, or otherwise secured in the actuated position*.	In accordance with the Surveillance Frequency Control Program
SR 3.5.1.11	----------NOTE---------- Valve actuation may be excluded. ---------- Verify the ADS actuates on an actual or simulated automatic initiation signal.	In accordance with the Surveillance Frequency Control Program
SR 3.5.1.12	Verify each ADS valve relief mode actuator strokes when manually actuated.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

	SURVEILLANCE	FREQUENCY
SR 3.5.2.4	Verify, for the required ECCS injection/spray subsystem, locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.5	----------NOTES---------- 1. A Low Pressure Coolant Injection (LPCI) subsystem may be considered OPERABLE during alignment and operation for decay heat removal if capable of being manually realigned and not otherwise inoperable. 2. Not required to be met for system vent flowpaths opened under administrative control. ----------	
	Verify for the required ECCS injection/spray subsystem, each manual, power operated, and automatic valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.6	Operate the required ECCS injection/spray subsystem through the recirculation line for ≥ 10 minutes.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.7	Verify each valve credited for automatically isolating a penetration flow path actuates to the isolation position on an actual or simulated isolation signal*, except for valves that are locked, sealed, or otherwise secured in the actuated position*.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.8	----------NOTE---------- Vessel injection/spray may be excluded. ----------	
	Verify the required ECCS injection/spray subsystem can be manually operated.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.5.3.1	Verify the RCIC System locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program
SR 3.5.3.2	----------NOTE---------- Not required to be met for system vent flowpaths opened under administrative control. ---------- Verify each RCIC System manual, power operated, and automatic valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position.	In accordance with the Surveillance Frequency Control Program
SR 3.5.3.3	----------NOTE---------- Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. ---------- Verify, with reactor pressure ≤ 1058 psig and ≥ 920 psig, the RCIC pump can develop a flow rate ≥ 400 gpm against a system head corresponding to reactor pressure.	In accordance with the Surveillance Frequency Control Program
SR 3.5.3.4	----------NOTE---------- Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. ---------- Verify, with reactor pressure ≤ 165 psig, the RCIC pump can develop a flow rate ≥ 400 gpm against a system head corresponding to reactor pressure.	In accordance with the Surveillance Frequency Control Program
SR 3.5.3.5	----------NOTE---------- Vessel injection may be excluded. ---------- Verify the RCIC System actuates on an actual or simulated automatic initiation signal*, except for valves that are locked, sealed, or otherwise secured in the actuated position*.	In accordance with the Surveillance Frequency Control Program

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
F. Two or more required SGT subsystems inoperable during movement of recently irradiated fuel assemblies in the secondary containment.	F.1 ----------NOTE---------- LCO 3.0.3 is not applicable. ---------- Suspend movement of recently irradiated fuel assemblies in secondary containment.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.4.3.1	Operate each required SGT subsystem for ≥ 15 continuous minutes.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.3.2	Perform required SGT filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.6.4.3.3	Verify each required SGT subsystem actuates on an actual or simulated initiation signal*, except for dampers that are locked, sealed, or otherwise secured in the actuated position*.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.2.1	Verify the water level in each PSW pump well of the intake structure is ≥ 60.5 ft mean sea level (MSL).	In accordance with the Surveillance Frequency Control Program AND 12 hours when water level is ≤ 61.7 ft MSL
SR 3.7.2.2	----------NOTE---------- Isolation of flow to individual components or systems does not render PSW System inoperable. ---------- Verify each PSW subsystem manual, power operated, and automatic valve in the flow paths servicing safety related systems or components, that is not locked, sealed, or otherwise secured in position, is in the correct position.	In accordance with the Surveillance Frequency Control Program
SR 3.7.2.3	Verify each PSW subsystem actuates on an actual or simulated initiation signal*, except for valves that are locked, sealed, or otherwise secured in the actuated position*.	In accordance with the Surveillance Frequency Control Program

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
F. Two MCREC subsystems inoperable during movement of irradiated fuel assemblies in the secondary containment or during CORE ALTERATIONS. OR One or more MCREC subsystems inoperable due to an inoperable CRE boundary during movement of irradiated fuel assemblies in the secondary containment or during CORE ALTERATIONS.	----------NOTE---------- LCO 3.0.3 is not applicable. ---------- F.1 Suspend movement of irradiated fuel assemblies in the secondary containment. AND F.2 Suspend CORE ALTERATIONS.	Immediately Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.4.1	Operate each MCREC subsystem ≥ 15 minutes.	In accordance with the Surveillance Frequency Control Program
SR 3.7.4.2	Perform required MCREC filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.7.4.3	Verify each MCREC subsystem actuates on an actual or simulated initiation signal*, except for dampers and valves that are locked, sealed, or otherwise secured in the actuated position.*	In accordance with the Surveillance Frequency Control Program

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(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.5.1.9	----------NOTE---------- Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. ---------- Verify, with reactor pressure ≤ 165 psig, the HPCI pump can develop a flow rate ≥ 4250 gpm against a system head corresponding to reactor system pressure.	In accordance with the Surveillance Frequency Control Program
SR 3.5.1.10	----------NOTE---------- Vessel injection/spray may be excluded. ---------- Verify each ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal*, except for valves that are locked, sealed, or otherwise secured in the actuated position*.	In accordance with the Surveillance Frequency Control Program
SR 3.5.1.11	----------NOTE---------- Valve actuation may be excluded. ---------- Verify the ADS actuates on an actual or simulated automatic initiation signal.	In accordance with the Surveillance Frequency Control Program
SR 3.5.1.12	Verify each ADS valve relief mode actuator strokes when manually actuated.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

	SURVEILLANCE	FREQUENCY
SR 3.5.2.4	Verify, for the required ECCS injection/spray subsystem, locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.5	----------NOTES---------- 1. A Low Pressure Coolant Injection (LPCI) subsystem may be considered OPERABLE during alignment and operation for decay heat removal if capable of being manually realigned and not otherwise inoperable. 2. Not required to be met for system vent flowpaths opened under administrative control. ---------- Verify for the required ECCS injection/spray subsystem, each manual, power operated, and automatic valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.6	Operate the required ECCS injection/spray subsystem through the recirculation line for ≥ 10 minutes.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.7	Verify each valve credited for automatically isolating a penetration flow path actuates to the isolation position on an actual or simulated isolation signal*, except for valves that are locked, sealed, or otherwise secured in the actuated position*.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.8	----------NOTE---------- Vessel injection/spray may be excluded. ---------- Verify the required ECCS injection/spray subsystem can be manually operated.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.5.3.5	----------NOTE---------- Vessel injection may be excluded. ---------- Verify the RCIC System actuates on an actual or simulated automatic initiation signal, *except for valves that are locked, sealed, or otherwise secured in the actuated position*.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.4.3.3	Verify each required SGT subsystem actuates on an actual or simulated initiation signal*, except for dampers that are locked, sealed, or otherwise secured in the actuated position*.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.2.1	Verify the water level in each PSW pump well of the intake structure is ≥ 60.5 ft mean sea level (MSL).	In accordance with the Surveillance Frequency Control Program AND 12 hours when water level is ≤ 61.7 ft MSL
SR 3.7.2.2	----------NOTE---------- Isolation of flow to individual components or systems does not render PSW System inoperable. ---------- Verify each PSW subsystem manual, power operated, and automatic valve in the flow paths servicing safety related systems or components, that is not locked, sealed, or otherwise secured in position, is in the correct position.	In accordance with the Surveillance Frequency Control Program
SR 3.7.2.3	Verify each PSW subsystem actuates on an actual or simulated initiation signal*, except for valves that are locked, sealed, or otherwise secured in the actuated position*.	In accordance with the Surveillance Frequency Control Program

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
F. Two MCREC subsystems inoperable during movement of irradiated fuel assemblies in the secondary containment or during CORE ALTERATIONS. OR One or more MCREC subsystems inoperable due to an inoperable CRE boundary during movement of irradiated fuel assemblies in the secondary containment or during CORE ALTERATIONS.	----------NOTE---------- LCO 3.0.3 is not applicable. ---------- F.1 Suspend movement of irradiated fuel assemblies in the secondary containment. AND F.2 Suspend CORE ALTERATIONS.	Immediately Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.4.1	Operate each MCREC subsystem ≥ 15 minutes.	In accordance with the Surveillance Frequency Control Program
SR 3.7.4.2	Perform required MCREC filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.7.4.3	Verify each MCREC subsystem actuates on an actual or simulated initiation signal*, except for dampers and valves that are locked, sealed, or otherwise secured in the actuated position*.	In accordance with the Surveillance Frequency Control Program

(continued)

Joseph M. Farley Nuclear Plant, Units 1 and 2
Edwin I. Hatch Nuclear Plant, Units 1 and 2
Vogtle Electric Generating Plant, Units 1 and 2
License Amendment Request to Revise
Technical Specifications to Adopt TSTF-541, Revision 2, "Add Exceptions to Surveillance Requirements for Valves and Dampers Locked in the Actuated Position"

Attachment 1c

VEGP Proposed Technical Specification Changes (Mark-Up)

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.10.1	Verify control room air temperature ≤ 85°F.	In accordance with the Surveillance Frequency Control Program
SR 3.7.10.2	Operate each CREFS train for ≥ 15 continuous minutes with the heater control circuit energized.	In accordance with the Surveillance Frequency Control Program
SR 3.7.10.3	Perform required CREFS filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.7.10.4	Verify each CREFS train actuates (switches to emergency mode) on an actual or simulated actuation signal*, except for dampers and valves that are locked, sealed, or otherwise secured in the actuated position*.	In accordance with the Surveillance Frequency Control Program
SR 3.7.10.5	Perform required CRE unfiltered air inleakage testing in accordance with the Control Room Envelope Habitability Program.	In accordance with the Control Room Envelope Habitability Program

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.13.1	Operate each PPAFES train for ≥ 15 minutes.	In accordance with the Surveillance Frequency Control Program
SR 3.7.13.2	Perform required PPAFES filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.7.13.3	Verify each PPAFES train actuates on an actual or simulated actuation signal*, except for dampers and valves that are locked, sealed, or otherwise secured in the actuated position*.	In accordance with the Surveillance Frequency Control Program
SR 3.7.13.4	Verify one PPAFES train can maintain a negative pressure ≥ 0.250 inches water gauge relative to atmospheric pressure during the post accident mode of operation at a flow rate of 15,500 cfm ± 10%.	In accordance with the Surveillance Frequency Control Program

Joseph M. Farley Nuclear Plant, Units 1 and 2
Edwin I. Hatch Nuclear Plant, Units 1 and 2
Vogtle Electric Generating Plant, Units 1 and 2
License Amendment Request to Revise
Technical Specifications to Adopt TSTF-541, Revision 2, "Add Exceptions to Surveillance Requirements for Valves and Dampers Locked in the Actuated Position"

Attachment 2a

FNP Revised Technical Specification Pages

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.10.3	----------NOTE---------- Not required to be performed in MODES 5 and 6. ---------- Verify each CREFS train actuates on an actual or simulated actuation signal, except for dampers and valves that are locked, sealed, or otherwise secured in the actuated position.	In accordance with the Surveillance Frequency Control Program
SR 3.7.10.4	Perform required CRE unfiltered air inleakage testing in accordance with the Control Room Envelope Habitability Program.	In accordance with the Control Room Envelope Habitability Program

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. Two PRF trains inoperable during movement of recently irradiated fuel assemblies in the SFPR.	E.1 Suspend movement of recently irradiated fuel assemblies in the SFPR.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.12.1	----------NOTE---------- Only required to be met during movement of recently irradiated fuel assemblies in the SFPR. ---------- Verify two PRF trains aligned to the SFPR.	In accordance with the Surveillance Frequency Control Program
SR 3.7.12.2	Operate each PRF train for ≥ 15 minutes in the applicable mode of operation (post LOCA and/or refueling accident).	In accordance with the Surveillance Frequency Control Program
SR 3.7.12.3	Perform required PRF filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.7.12.4	Verify each PRF train actuates and the normal spent fuel pool room ventilation system isolates on an actual or simulated actuation signal, except for dampers and valves that are locked, sealed, or otherwise secured in the actuated position.	In accordance with the Surveillance Frequency Control Program
SR 3.7.12.5	Verify one PRF train can maintain a pressure ≤ -0.125 inches water gauge with respect to adjacent areas during the post LOCA mode of operation at a flow rate ≤ 5500 cfm.	In accordance with the Surveillance Frequency Control Program
SR 3.7.12.6	Verify one PRF train can maintain a slightly negative pressure with respect to adjacent areas during the fuel handling accident mode of operation at a flow rate ≤ 5500 cfm.	In accordance with the Surveillance Frequency Control Program

Joseph M. Farley Nuclear Plant, Units 1 and 2
Edwin I. Hatch Nuclear Plant, Units 1 and 2
Vogtle Electric Generating Plant, Units 1 and 2
License Amendment Request to Revise
Technical Specifications to Adopt TSTF-541, Revision 2, "Add Exceptions to Surveillance Requirements for Valves and Dampers Locked in the Actuated Position"

Attachment 2b

HNP Revised Technical Specification Pages

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.5.1.9	----------NOTE---------- Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. ---------- Verify, with reactor pressure ≤ 165 psig, the HPCI pump can develop a flow rate ≥ 4250 gpm against a system head corresponding to reactor system pressure.	In accordance with the Surveillance Frequency Control Program
SR 3.5.1.10	----------NOTE---------- Vessel injection/spray may be excluded. ---------- Verify each ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal, except for valves that are locked, sealed, or otherwise secured in the actuated position.	In accordance with the Surveillance Frequency Control Program
SR 3.5.1.11	----------NOTE---------- Valve actuation may be excluded. ---------- Verify the ADS actuates on an actual or simulated automatic initiation signal.	In accordance with the Surveillance Frequency Control Program
SR 3.5.1.12	Verify each ADS valve relief mode actuator strokes when manually actuated.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

	SURVEILLANCE	FREQUENCY
SR 3.5.2.4	Verify, for the required ECCS injection/spray subsystem, locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.5	----------NOTES---------- 1. A Low Pressure Coolant Injection (LPCI) subsystem may be considered OPERABLE during alignment and operation for decay heat removal if capable of being manually realigned and not otherwise inoperable. 2. Not required to be met for system vent flowpaths opened under administrative control. ----------	
	Verify for the required ECCS injection/spray subsystem, each manual, power operated, and automatic valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.6	Operate the required ECCS injection/spray subsystem through the recirculation line for ≥ 10 minutes.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.7	Verify each valve credited for automatically isolating a penetration flow path actuates to the isolation position on an actual or simulated isolation signal, except for valves that are locked, sealed, or otherwise secured in the actuated position.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.8	----------NOTE---------- Vessel injection/spray may be excluded. ----------	
	Verify the required ECCS injection/spray subsystem can be manually operated.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.5.3.1	Verify the RCIC System locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program
SR 3.5.3.2	----------NOTE---------- Not required to be met for system vent flowpaths opened under administrative control. ---------- Verify each RCIC System manual, power operated, and automatic valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position.	In accordance with the Surveillance Frequency Control Program
SR 3.5.3.3	----------NOTE---------- Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. ---------- Verify, with reactor pressure ≤ 1058 psig and ≥ 920 psig, the RCIC pump can develop a flow rate ≥ 400 gpm against a system head corresponding to reactor pressure.	In accordance with the Surveillance Frequency Control Program
SR 3.5.3.4	----------NOTE---------- Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. ---------- Verify, with reactor pressure ≤ 165 psig, the RCIC pump can develop a flow rate ≥ 400 gpm against a system head corresponding to reactor pressure.	In accordance with the Surveillance Frequency Control Program
SR 3.5.3.5	----------NOTE---------- Vessel injection may be excluded. ---------- Verify the RCIC System actuates on an actual or simulated automatic initiation signal, except for valves that are locked, sealed, or otherwise secured in the actuated position.	In accordance with the Surveillance Frequency Control Program

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
F. Two or more required SGT subsystems inoperable during movement of recently irradiated fuel assemblies in the secondary containment.	F.1 ----------NOTE---------- LCO 3.0.3 is not applicable. ---------- Suspend movement of recently irradiated fuel assemblies in secondary containment.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.4.3.1	Operate each required SGT subsystem for ≥ 15 continuous minutes.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.3.2	Perform required SGT filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.6.4.3.3	Verify each required SGT subsystem actuates on an actual or simulated initiation signal, except for dampers that are locked, sealed, or otherwise secured in the actuated position.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.2.1	Verify the water level in each PSW pump well of the intake structure is ≥ 60.5 ft mean sea level (MSL).	In accordance with the Surveillance Frequency Control Program AND 12 hours when water level is ≤ 61.7 ft MSL
SR 3.7.2.2	----------NOTE---------- Isolation of flow to individual components or systems does not render PSW System inoperable. ---------- Verify each PSW subsystem manual, power operated, and automatic valve in the flow paths servicing safety related systems or components, that is not locked, sealed, or otherwise secured in position, is in the correct position.	In accordance with the Surveillance Frequency Control Program
SR 3.7.2.3	Verify each PSW subsystem actuates on an actual or simulated initiation signal, except for valves that are locked, sealed, or otherwise secured in the actuated position.	In accordance with the Surveillance Frequency Control Program

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
F. Two MCREC subsystems inoperable during movement of irradiated fuel assemblies in the secondary containment or during CORE ALTERATIONS. OR One or more MCREC subsystems inoperable due to an inoperable CRE boundary during movement of irradiated fuel assemblies in the secondary containment or during CORE ALTERATIONS.	----------NOTE---------- LCO 3.0.3 is not applicable. ---------- F.1 Suspend movement of irradiated fuel assemblies in the secondary containment. AND F.2 Suspend CORE ALTERATIONS.	Immediately Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.4.1	Operate each MCREC subsystem ≥ 15 minutes.	In accordance with the Surveillance Frequency Control Program
SR 3.7.4.2	Perform required MCREC filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.7.4.3	Verify each MCREC subsystem actuates on an actual or simulated initiation signal, except for dampers and valves that are locked, sealed, or otherwise secured in the actuated position.	In accordance with the Surveillance Frequency Control Program

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.5.1.9	----------NOTE---------- Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. ---------- Verify, with reactor pressure ≤ 165 psig, the HPCI pump can develop a flow rate ≥ 4250 gpm against a system head corresponding to reactor system pressure.	In accordance with the Surveillance Frequency Control Program
SR 3.5.1.10	----------NOTE---------- Vessel injection/spray may be excluded. ---------- Verify each ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal, except for valves that are locked, sealed, or otherwise secured in the actuated position.	In accordance with the Surveillance Frequency Control Program
SR 3.5.1.11	----------NOTE---------- Valve actuation may be excluded. ---------- Verify the ADS actuates on an actual or simulated automatic initiation signal.	In accordance with the Surveillance Frequency Control Program
SR 3.5.1.12	Verify each ADS valve relief mode actuator strokes when manually actuated.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

	SURVEILLANCE	FREQUENCY
SR 3.5.2.4	Verify, for the required ECCS injection/spray subsystem, locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.5	----------NOTES---------- 1. A Low Pressure Coolant Injection (LPCI) subsystem may be considered OPERABLE during alignment and operation for decay heat removal if capable of being manually realigned and not otherwise inoperable. 2. Not required to be met for system vent flowpaths opened under administrative control. ----------	
	Verify for the required ECCS injection/spray subsystem, each manual, power operated, and automatic valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.6	Operate the required ECCS injection/spray subsystem through the recirculation line for ≥ 10 minutes.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.7	Verify each valve credited for automatically isolating a penetration flow path actuates to the isolation position on an actual or simulated isolation signal, except for valves that are locked, sealed, or otherwise secured in the actuated position.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.8	----------NOTE---------- Vessel injection/spray may be excluded. ----------	
	Verify the required ECCS injection/spray subsystem can be manually operated.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.5.3.5	----------NOTE---------- Vessel injection may be excluded. ---------- Verify the RCIC System actuates on an actual or simulated automatic initiation signal, except for valves that are locked, sealed, or otherwise secured in the actuated position.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.4.3.3	Verify each required SGT subsystem actuates on an actual or simulated initiation signal, except for dampers that are locked, sealed, or otherwise secured in the actuated position.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.2.1	Verify the water level in each PSW pump well of the intake structure is ≥ 60.5 ft mean sea level (MSL).	In accordance with the Surveillance Frequency Control Program AND 12 hours when water level is ≤ 61.7 ft MSL
SR 3.7.2.2	----------NOTE---------- Isolation of flow to individual components or systems does not render PSW System inoperable. ---------- Verify each PSW subsystem manual, power operated, and automatic valve in the flow paths servicing safety related systems or components, that is not locked, sealed, or otherwise secured in position, is in the correct position.	In accordance with the Surveillance Frequency Control Program
SR 3.7.2.3	Verify each PSW subsystem actuates on an actual or simulated initiation signal, except for valves that are locked, sealed, or otherwise secured in the actuated position.	In accordance with the Surveillance Frequency Control Program

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
F. Two MCREC subsystems inoperable during movement of irradiated fuel assemblies in the secondary containment or during CORE ALTERATIONS. OR One or more MCREC subsystems inoperable due to an inoperable CRE boundary during movement of irradiated fuel assemblies in the secondary containment or during CORE ALTERATIONS.	----------NOTE---------- LCO 3.0.3 is not applicable. ---------- F.1 Suspend movement of irradiated fuel assemblies in the secondary containment. AND F.2 Suspend CORE ALTERATIONS.	Immediately Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.4.1	Operate each MCREC subsystem ≥ 15 minutes.	In accordance with the Surveillance Frequency Control Program
SR 3.7.4.2	Perform required MCREC filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.7.4.3	Verify each MCREC subsystem actuates on an actual or simulated initiation signal, except for dampers and valves that are locked, sealed, or otherwise secured in the actuated position.	In accordance with the Surveillance Frequency Control Program

(continued)

Joseph M. Farley Nuclear Plant, Units 1 and 2
Edwin I. Hatch Nuclear Plant, Units 1 and 2
Vogtle Electric Generating Plant, Units 1 and 2
License Amendment Request to Revise
Technical Specifications to Adopt TSTF-541, Revision 2, "Add Exceptions to Surveillance Requirements for Valves and Dampers Locked in the Actuated Position"

Attachment 2c

VEGP Revised Technical Specification Pages

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.10.1	Verify control room air temperature ≤ 85°F.	In accordance with the Surveillance Frequency Control Program
SR 3.7.10.2	Operate each CREFS train for ≥ 15 continuous minutes with the heater control circuit energized.	In accordance with the Surveillance Frequency Control Program
SR 3.7.10.3	Perform required CREFS filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.7.10.4	Verify each CREFS train actuates (switches to emergency mode) on an actual or simulated actuation signal, except for dampers and valves that are locked, sealed, or otherwise secured in the actuated position.	In accordance with the Surveillance Frequency Control Program
SR 3.7.10.5	Perform required CRE unfiltered air inleakage testing in accordance with the Control Room Envelope Habitability Program.	In accordance with the Control Room Envelope Habitability Program

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.13.1	Operate each PPAFES train for ≥ 15 minutes.	In accordance with the Surveillance Frequency Control Program
SR 3.7.13.2	Perform required PPAFES filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.7.13.3	Verify each PPAFES train actuates on an actual or simulated actuation signal, except for dampers and valves that are locked, sealed, or otherwise secured in the actuated position.	In accordance with the Surveillance Frequency Control Program
SR 3.7.13.4	Verify one PPAFES train can maintain a negative pressure ≥ 0.250 inches water gauge relative to atmospheric pressure during the post accident mode of operation at a flow rate of 15,500 cfm ± 10%.	In accordance with the Surveillance Frequency Control Program

Joseph M. Farley Nuclear Plant, Units 1 and 2
Edwin I. Hatch Nuclear Plant, Units 1 and 2
Vogtle Electric Generating Plant, Units 1 and 2
License Amendment Request to Revise
Technical Specifications to Adopt TSTF-541, Revision 2, "Add Exceptions to Surveillance Requirements for Valves and Dampers Locked in the Actuated Position"

Attachment 3a

FNP Proposed Technical Specification Bases Changes (Mark-Up) for Information Only

BASES

SURVEILLANCE REQUIREMENTS

SR 3.7.10.1

Standby systems should be checked periodically to ensure that they function properly. As the environment and normal operating conditions on this system are not severe, testing each train (CREFS and Pressurization) provides an adequate check of this system. The CREFS trains are initiated from the control room with flow through the HEPA and charcoal filters. Systems must be operated for ≥ 15 minutes to demonstrate the function of the system (Ref. 3). Systems with heaters must be operated with the heaters energized. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.7.10.2

This SR verifies that the required CREFS testing is performed in accordance with the Ventilation Filter Testing Program (VFTP). The CREFS filter tests are in accordance with ASME N510-1989 (Ref. 4). The VFTP includes testing the performance of the HEPA filter, charcoal adsorber efficiency, flow rate, and the physical properties of the activated charcoal. Specific test Frequencies and additional information are discussed in detail in the VFTP.

SR 3.7.10.3

This SR verifies that each CREFS train starts and operates on an actual or simulated Safety Injection (SI) actuation signal. *The SR excludes automatic dampers and valves that are locked, sealed, or otherwise secured in the actuated position. The SR does not apply to dampers or valves that are locked, sealed, or otherwise secured in the actuated position since the affected dampers or valves were verified to be in the actuated position prior to being locked, sealed, or otherwise secured. Placing an automatic valve or damper in a locked, sealed, or otherwise secured position requires an assessment of the operability of the system or any supported systems, including whether it is necessary for the valve or damper to be repositioned to the non-actuated position to support the accident analysis. Restoration of an automatic valve or damper to the non-actuated position requires verification that the SR has been met within its required Frequency.* The Surveillance Frequency is controlled under the Surveillance Frequency Control Program. This SR is modified by a note which provides an exception to the requirement to meet this SR in MODES 5 and 6. This is acceptable since the automatic SI actuation function is not required in these MODES.

SR 3.7.10.4

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.7.12.4

This SR verifies that each PRF train starts and operates on an actual or simulated Phase B actuation signal. In addition, the normal spent fuel pool ventilation system must be verified to isolate on an actual or simulated spent fuel pool ventilation low differential pressure signal and on an actual or simulated spent fuel pool high radiation signal. *The SR excludes automatic dampers and valves that are locked, sealed, or otherwise secured in the actuated position. The SR does not apply to dampers or valves that are locked, sealed, or otherwise secured in the actuated position since the affected dampers or valves were verified to be in the actuated position prior to being locked, sealed, or otherwise secured. Placing an automatic valve or damper in a locked, sealed, or otherwise secured position requires an assessment of the operability of the system or any supported systems, including whether it is necessary for the valve or damper to be repositioned to the non-actuated position to support the accident analysis. Restoration of an automatic valve or damper to the non-actuated position requires verification that the SR has been met within its required Frequency.* The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.7.12.5

This SR verifies the integrity of the ECCS pump rooms and penetration area boundary. The ability of the boundary to maintain negative pressure with respect to potentially uncontaminated adjacent areas is periodically tested to verify proper function of the PRF System. During the post-LOCA mode of operation, the PRF System is designed to maintain a slight negative pressure in the ECCS pump rooms and penetration area boundary, to prevent unfiltered LEAKAGE. The PRF System is designed to maintain ≤ -0.125 inches water gauge with respect to adjacent area pressure (as measured by the ΔP between the PRF mechanical equipment room and the RHR Heat Exchanger Room) at a flow rate of ≤ 5,500 cfm.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.7.12.6

During the fuel handling mode of operation, the PRF is designed to maintain a slightly negative pressure in the spent fuel pool room with respect to atmospheric pressure and surrounding areas at a flow rate of ≤ 5,500 cfm, to prevent unfiltered leakage. The slightly negative pressure is verified by using a non-rigorous method that yields some

Joseph M. Farley Nuclear Plant, Units 1 and 2
Edwin I. Hatch Nuclear Plant, Units 1 and 2
Vogtle Electric Generating Plant, Units 1 and 2
License Amendment Request to Revise
Technical Specifications to Adopt TSTF-541, Revision 2, "Add Exceptions to Surveillance Requirements for Valves and Dampers Locked in the Actuated Position"

Attachment 3b

HNP Proposed Technical Specification Bases Changes (Mark-Up) for Information Only

SURVEILLANCE REQUIREMENTS

SR 3.5.1.7, SR 3.5.1.8, and SR 3.5.1.9 (continued)

steam flow for SR 3.5.1.8 is represented by at least two turbine bypass valves open, or ≥ 200 MWE from the main turbine generator; and for SR 3.5.1.9 adequate steam flow is represented by at least 1.25 turbine bypass valves open, or total steam flow ≥ 1E6 lb/hour. Therefore, sufficient time is allowed after adequate pressure and flow are achieved to perform these tests. Reactor startup is allowed prior to performing the low pressure Surveillance test because the reactor pressure is low and the time allowed to satisfactorily perform the Surveillance test is short. The reactor pressure is allowed to be increased to normal operating pressure since it is assumed that the low pressure test has been satisfactorily completed and there is no indication or reason to believe that HPCI is inoperable. Therefore, SR 3.5.1.8 and SR 3.5.1.9 are modified by Notes that state the Surveillances are not required to be performed until 12 hours after the reactor steam pressure and flow are adequate to perform the test. The 12 hours allowed is sufficient to achieve stable conditions for testing and provides a reasonable time to complete the SR.

The Frequency for SR 3.5.1.7 is consistent with the INSERVICE TESTING PROGRAM pump testing requirements. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.5.1.10

The ECCS subsystems are required to actuate automatically to perform their design functions. This Surveillance verifies that, with a required system initiation signal (actual or simulated), the automatic initiation logic of HPCI, CS, and LPCI will cause the systems or subsystems to operate as designed, including actuation of the system throughout its emergency operating sequence, automatic pump startup and actuation of all automatic valves to their required positions. This SR also ensures that the HPCI System will automatically restart on an RPV low water level (Level 2) signal received subsequent to an RPV high water level (Level 8) trip and that the suction is automatically transferred from the CST to the suppression pool. *The SR excludes automatic valves that are locked, sealed, or otherwise secured in the actuated position. The SR does not apply to valves that are locked, sealed, or otherwise secured in the actuated position since the affected valves were verified to be in the actuated position prior to being locked, sealed, or otherwise secured. Placing an automatic valve in a locked, sealed, or otherwise secured position requires an assessment of the operability of the*

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.5.1.10 (continued)

system or any supported systems, including whether it is necessary for the valve to be repositioned to the non-actuated position to support the accident analysis. Restoration of an automatic valve to the non-actuated position requires verification that the SR has been met within its required Frequency. The LOGIC SYSTEM FUNCTIONAL TEST performed in LCO 3.3.5.1 overlaps this Surveillance to provide complete testing of the assumed safety function.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

This SR is modified by a Note that excludes vessel injection/spray during the Surveillance. Since all active components are testable and full flow can be demonstrated by recirculation through the test line, coolant injection into the RPV is not required during the Surveillance.

SR 3.5.1.11

The ADS designated S/RVs are required to actuate automatically upon receipt of specific initiation signals. A system functional test is performed to demonstrate that the mechanical portions of the ADS function (i.e., solenoids) operate as designed when initiated either by an actual or simulated initiation signal, causing proper actuation of all the required components. SR 3.5.1.12 and the LOGIC SYSTEM FUNCTIONAL TEST performed in LCO 3.3.5.1 overlap this Surveillance to provide complete testing of the assumed safety function.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

This SR is modified by a Note that excludes valve actuation. This prevents an RPV pressure blowdown.

SR 3.5.1.12

The pneumatic actuator of each ADS valve is stroked to verify that the pilot disc rod lifts when the actuator strokes. Pilot rod lift is determined by measurement of rod travel. The total amount of lift of the pilot rod from the valve closed position to the open position shall meet criteria established by the S/RV supplier. SRs 3.5.1.11 and

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.5.2.5 (continued)

This will ensure adequate core cooling if an inadvertent RPV draindown should occur.

The Surveillance is also modified by a Note 2 which exempts system vent flow paths opened under administrative control. The administrative control should be proceduralized and include stationing a dedicated individual who can rapidly close the system vent flow path if directed.

SR 3.5.2.6

Verifying that the required ECCS injection/spray subsystem can be manually started and operated for at least 10 minutes demonstrates that the subsystem is available to mitigate a draining event. Testing the ECCS injection/spray subsystem through the recirculation line is necessary to avoid overfilling the refueling cavity. The minimum operating time of 10 minutes was based on engineering judgement.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.5.2.7

Verifying that each valve credited for automatically isolating a penetration flow path actuates to the isolation position on an actual or simulated RPV water level isolation signal is required to prevent RPV water inventory from dropping below that TAF should an unexpected draining event occur. *The SR excludes automatic valves that are locked, sealed, or otherwise secured in the actuated position. The SR does not apply to valves that are locked, sealed, or otherwise secured in the actuated position since the affected valves were verified to be in the actuated position prior to being locked, sealed, or otherwise secured. Placing an automatic valve in a locked, sealed, or otherwise secured position requires an assessment of the operability of the system or any supported systems, including whether it is necessary for the valve to be repositioned to the non-actuated position to support the accident analysis. Restoration of an automatic valve to the non-actuated position requires verification that the SR has been met within its required Frequency.*

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.5.3.3 and SR 3.5.3.4 (continued)

Therefore, these SRs are modified by Notes that state the Surveillances are not required to be performed until 12 hours after the reactor steam pressure and flow are adequate to perform the test. The 12 hours allowed is sufficient to achieve stable conditions for testing and provides a reasonable time to complete the SR. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.5.3.5

The RCIC System is required to actuate automatically in order to verify its design function satisfactorily. This Surveillance verifies that, with a required system initiation signal (actual or simulated), the automatic initiation logic of the RCIC System will cause the system to operate as designed, including actuation of the system throughout its emergency operating sequence; that is, automatic pump startup and actuation of all automatic valves to their required positions. This test also ensures the RCIC System will automatically restart on an RPV low water level (Level 2) signal received subsequent to an RPV high water level (Level 8) trip and that the suction is automatically transferred from the CST to the suppression pool. *The SR excludes automatic valves that are locked, sealed, or otherwise secured in the actuated position. The SR does not apply to valves that are locked, sealed, or otherwise secured in the actuated position since the affected valves were verified to be in the actuated position prior to being locked, sealed, or otherwise secured. Placing an automatic valve in a locked, sealed, or otherwise secured position requires an assessment of the operability of the system or any supported systems, including whether it is necessary for the valve to be repositioned to the non-actuated position to support the accident analysis. Restoration of an automatic valve to the non-actuated position requires verification that the SR has been met within its required Frequency.* The LOGIC SYSTEM FUNCTIONAL TEST performed in LCO 3.3.5.2 overlaps this Surveillance to provide complete testing of the assumed safety function.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

This SR is modified by a Note that excludes vessel injection during the Surveillance. Since all active components are testable and full flow can be demonstrated by recirculation through the test line, coolant injection into the RPV is not required during the Surveillance.

(continued)

BASES (continued)

SURVEILLANCE REQUIREMENTS

SR 3.6.4.3.1

Operating each required Unit 1 and Unit 2 SGT subsystem for ≥ 15 continuous minutes ensures that they are OPERABLE and that all associated controls are functioning properly. It also ensures that blockage, fan or motor failure, or excessive vibration can be detected for corrective action. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.6.4.3.2

This SR verifies that the required Unit 1 and Unit 2 SGT filter testing is performed in accordance with the Ventilation Filter Testing Program (VFTP). The VFTP includes testing HEPA filter performance, charcoal adsorber efficiency, minimum system flow rate, and the physical properties of the activated charcoal (general use and following specific operations). Specific test frequencies and additional information are discussed in detail in the VFTP.

SR 3.6.4.3.3

This SR verifies that each required Unit 1 and Unit 2 SGT subsystem starts on receipt of an actual or simulated initiation signal. *The SR excludes automatic dampers that are locked, sealed, or otherwise secured in the actuated position. The SR does not apply to dampers that are locked, sealed, or otherwise secured in the actuated position since the affected valves were verified to be in the actuated position prior to being locked, sealed, or otherwise secured. Placing an automatic damper in a locked, sealed, or otherwise secured position requires an assessment of the operability of the system or any supported systems, including whether it is necessary for the damper to be repositioned to the non-actuated position to support the accident analysis. Restoration of an automatic damper to the non-actuated position requires verification that the SR has been met within its required Frequency.* The LOGIC SYSTEM FUNCTIONAL TEST in SR 3.3.6.2.5 overlaps this SR to provide complete testing of the safety function. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.7.2.2 (continued)

This SR is modified by a Note indicating that isolation of the PSW System to components or systems may render those components or systems inoperable, but does not affect the OPERABILITY of the PSW System. As such, when all PSW pumps, valves, and piping are OPERABLE, but a branch connection off the main header is isolated, the PSW System is still OPERABLE.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.7.2.3

This SR verifies that the automatic isolation valves of the PSW System will automatically switch to the safety or emergency position to provide cooling water exclusively to the safety related equipment during an accident event. This is demonstrated by the use of an actual or simulated initiation signal. This SR also verifies the automatic start capability (on a LOCA or LOSP signal) of one of the two PSW pumps in each subsystem. *The SR excludes automatic valves that are locked, sealed, or otherwise secured in the actuated position. The SR does not apply to valves that are locked, sealed, or otherwise secured in the actuated position since the affected valves were verified to be in the actuated position prior to being locked, sealed, or otherwise secured. Placing an automatic valve in a locked, sealed, or otherwise secured position requires an assessment of the operability of the system or any supported systems, including whether it is necessary for the valve to be repositioned to the non-actuated position to support the accident analysis. Restoration of an automatic valve to the non-actuated position requires verification that the SR has been met within its required Frequency.*

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

REFERENCES

1. FSAR, Section 10.7.

2. FSAR, Section 5.2.

3. Unit 2 FSAR, Chapter 15.

4. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

5. NEDC-32988-A, Revision 2, Technical Justification to Support Risk-Informed Modification to Selected Required End States

BASES (continued)

SURVEILLANCE REQUIREMENTS

SR 3.7.4.1

This SR verifies that a subsystem in a standby mode starts on demand and continues to operate. Standby systems should be checked periodically to ensure that they start and function properly. As the environmental and normal operating conditions of this system are not severe, testing each subsystem once every 31 days provides an adequate check on this system. Since the MCREC System does not have heaters, each subsystem need only be operated for ≥ 15 minutes to demonstrate the function of the subsystem. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.7.4.2

This SR verifies that the required MCREC testing is performed in accordance with the Ventilation Filter Testing Program (VFTP). The VFTP includes testing HEPA filter performance, charcoal adsorber efficiency, minimum system flow rate, and the physical properties of the activated charcoal (general use and following specific operations). Specific test Frequencies and additional information are discussed in detail in the VFTP.

SR 3.7.4.3

This SR verifies that on an actual or simulated initiation signal, each MCREC subsystem starts and operates. The LOGIC SYSTEM FUNCTIONAL TEST in SR 3.3.7.1.4 overlaps this SR to provide complete testing of the safety function. *The SR excludes automatic dampers and valves that are locked, sealed, or otherwise secured in the actuated position. The SR does not apply to dampers or valves that are locked, sealed, or otherwise secured in the actuated position since the affected dampers or valves were verified to be in the actuated position prior to being locked, sealed, or otherwise secured. Placing an automatic valve or damper in a locked, sealed, or otherwise secured position requires an assessment of the operability of the system or any supported systems, including whether it is necessary for the valve or damper to be repositioned to the non-actuated position to support the accident analysis. Restoration of an automatic valve or damper to the non-actuated position requires verification that the SR has been met within its required Frequency.* This Surveillance can be performed with the reactor at power. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

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SURVEILLANCE REQUIREMENTS

SR 3.5.1.7, SR 3.5.1.8, and SR 3.5.1.9 (continued)

steam flow for SR 3.5.1.8 is represented by at least two turbine bypass valves open, or ≥ 200 MWE from the main turbine-generator; and for SR 3.5.1.9 adequate steam flow is represented by at least 1.25 turbine bypass valves open, or total steam flow ≥ 1E6 lb/hour. Therefore, sufficient time is allowed after adequate pressure and flow are achieved to perform these tests. Reactor startup is allowed prior to performing the low pressure Surveillance test because the reactor pressure is low and the time allowed to satisfactorily perform the Surveillance test is short. The reactor pressure is allowed to be increased to normal operating pressure since it is assumed that the low pressure test has been satisfactorily completed and there is no indication or reason to believe that HPCI is inoperable. Therefore, SR 3.5.1.8 and SR 3.5.1.9 are modified by Notes that state the Surveillances are not required to be performed until 12 hours after the reactor steam pressure and flow are adequate to perform the test. The 12 hours allowed is sufficient to achieve stable conditions for testing and provides a reasonable time to complete the SR.

The Frequency for SR 3.5.1.7 is consistent with the INSERVICE TESTING PROGRAM pump testing requirements. The Frequencies for SR 3.5.1.8 and SR 3.5.1.9 are based on operating experience, equipment reliability, and plant risk, and are controlled under the Surveillance Frequency Control Program.

SR 3.5.1.10

The ECCS subsystems are required to actuate automatically to perform their design functions. This Surveillance verifies that, with a required system initiation signal (actual or simulated), the automatic initiation logic of HPCI, CS, and LPCI will cause the systems or subsystems to operate as designed, including actuation of the system throughout its emergency operating sequence, automatic pump startup and actuation of all automatic valves to their required positions. This SR also ensures that the HPCI System will automatically restart on an RPV low water level (Level 2) signal received subsequent to an RPV high water level (Level 8) trip and that the suction is automatically transferred from the CST to the suppression pool. *The SR excludes automatic valves that are locked, sealed, or otherwise secured in the actuated position. The SR does not apply to valves that are locked, sealed, or otherwise secured in the actuated position since the affected valves were verified to be in the actuated position prior to being locked, sealed, or otherwise secured. Placing an automatic valve in a locked, sealed, or otherwise secured position requires an assessment of the operability of the system or any supported systems, including whether it is necessary*

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SURVEILLANCE REQUIREMENTS

SR 3.5.1.10 (continued)

for the valve to be repositioned to the non-actuated position to support the accident analysis. Restoration of an automatic valve to the non-actuated position requires verification that the SR has been met within its required Frequency. The LOGIC SYSTEM FUNCTIONAL TEST performed in LCO 3.3.5.1 overlaps this Surveillance to provide complete testing of the assumed safety function.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

This SR is modified by a Note that excludes vessel injection/spray during the Surveillance. Since all active components are testable and full flow can be demonstrated by recirculation through the test line, coolant injection into the RPV is not required during the Surveillance.

SR 3.5.1.11

The ADS designated S/RVs are required to actuate automatically upon receipt of specific initiation signals. A system functional test is performed to demonstrate that the mechanical portions of the ADS function (i.e., solenoids) operate as designed when initiated either by an actual or simulated initiation signal, causing proper actuation of all the required components. SR 3.5.1.12 and the LOGIC SYSTEM FUNCTIONAL TEST performed in LCO 3.3.5.1 overlap this Surveillance to provide complete testing of the assumed safety function.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

This SR is modified by a Note that excludes valve actuation. This prevents an RPV pressure blowdown.

SR 3.5.1.12

The pneumatic actuator of each ADS valve is stroked to verify that the actuator shaft moves when the air operator module is pneumatically energized. This action confirms correct electrical and pneumatic connections between the electrical switch for the S/RV and its associated solenoid valve and, subsequently, the pneumatic operator. Successful confirmation of actuator shaft movement provides that this shaft will actuate the S/RV second stage disc. Confirmation that actuation of the second stage shaft

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.5.2.6

Verifying that the required ECCS injection/spray subsystem can be manually started and operate for at least 10 minutes demonstrates that the subsystem is available to mitigate a draining event. Testing the ECCS injection/spray subsystem through the recirculation line is necessary to avoid overfilling the refueling cavity. The minimum operating time of 10 minutes was based on engineering judgement.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.5.2.7

Verifying that each valve credited for automatically isolating a penetration flow path actuates to the isolation position on an actual or simulated RPV water level isolation signal is required to prevent RPV water inventory from dropping below the TAF should an unexpected draining event occur. *The SR excludes automatic valves that are locked, sealed, or otherwise secured in the actuated position. The SR does not apply to valves that are locked, sealed, or otherwise secured in the actuated position since the affected valves were verified to be in the actuated position prior to being locked, sealed, or otherwise secured. Placing an automatic valve in a locked, sealed, or otherwise secured position requires an assessment of the operability of the system or any supported systems, including whether it is necessary for the valve to be repositioned to the non-actuated position to support the accident analysis. Restoration of an automatic valve to the non-actuated position requires verification that the SR has been met within its required Frequency.*

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.5.2.8

The required ECCS subsystem shall be capable of being manually operated. This Surveillance verifies that the required CS or LPCI subsystem (including the associated pump and valve(s)) can be manually operated to provide additional RPV Water Inventory, if needed.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.5.3.5

The RCIC System is required to actuate automatically in order to verify its design function satisfactorily. This Surveillance verifies that, with a required system initiation signal (actual or simulated), the automatic initiation logic of the RCIC System will cause the system to operate as designed, including actuation of the system throughout its emergency operating sequence; that is, automatic pump startup and actuation of all automatic valves to their required positions. This test also ensures the RCIC System will automatically restart on an RPV low water level (Level 2) signal received subsequent to an RPV high water level (Level 8) trip and that the suction is automatically transferred from the CST to the suppression pool. *The SR excludes automatic valves that are locked, sealed, or otherwise secured in the actuated position. The SR does not apply to valves that are locked, sealed, or otherwise secured in the actuated position since the affected valves were verified to be in the actuated position prior to being locked, sealed, or otherwise secured. Placing an automatic valve in a locked, sealed, or otherwise secured position requires an assessment of the operability of the system or any supported systems, including whether it is necessary for the valve to be repositioned to the non-actuated position to support the accident analysis. Restoration of an automatic valve to the non-actuated position requires verification that the SR has been met within its required Frequency.* The LOGIC SYSTEM FUNCTIONAL TEST performed in LCO 3.3.5.2 overlaps this Surveillance to provide complete testing of the assumed safety function.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

This SR is modified by a Note that excludes vessel injection during the Surveillance. Since all active components are testable and full flow can be demonstrated by recirculation through the test line, coolant injection into the RPV is not required during the Surveillance.

REFERENCES

1. 10 CFR 50, Appendix A, GDC 33.

2. FSAR, Section 5.5.6.

3. Memorandum from R.L. Baer (NRC) to V. Stello, Jr. (NRC), "Recommended Interim Revisions to LCOs for ECCS Components," December 1, 1975.

4. GE Report AES-41-0688, "Safety Evaluation for Relaxation of RCIC Performance Requirements for Plant Hatch Units 1 and 2," July 1988.

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.6.4.3.3

This SR verifies that each required Unit 1 and Unit 2 SGT subsystem starts on receipt of an actual or simulated initiation signal. *The SR excludes automatic dampers that are locked, sealed, or otherwise secured in the actuated position. The SR does not apply to dampers that are locked, sealed, or otherwise secured in the actuated position since the affected valves were verified to be in the actuated position prior to being locked, sealed, or otherwise secured. Placing an automatic damper in a locked, sealed, or otherwise secured position requires an assessment of the operability of the system or any supported systems, including whether it is necessary for the damper to be repositioned to the non-actuated position to support the accident analysis. Restoration of an automatic damper to the non-actuated position requires verification that the SR has been met within its required Frequency.* The LOGIC SYSTEM FUNCTIONAL TEST in SR 3.3.6.2.5 overlaps this SR to provide complete testing of the safety function. This Surveillance can be performed with the reactor at power. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

REFERENCES

1. 10 CFR 50, Appendix A, GDC 41.
2. Unit 1 FSAR, Section 5.3.2.3.
3. Unit 2 FSAR, Section 6.2.4.
4. Unit 2 FSAR, Section 15.2.
5. Unit 2 FSAR, Section 15.3.
6. Technical Requirements Manual, Section 8.0.
7. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.
8. NEDC-32988-A, Revision 2, Technical Justification to Support Risk-Informed Modification to Selected Required End States for BWR Plants, December 2002.

BASES

SURVEILLANCE REQUIREMENTS

SR 3.7.2.2 (continued)

This SR is modified by a Note indicating that isolation of the PSW System to components or systems may render those components or systems inoperable, but does not affect the OPERABILITY of the PSW System. As such, when all PSW pumps, valves, and piping are OPERABLE, but a branch connection off the main header is isolated, the PSW System is still OPERABLE.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.7.2.3

This SR verifies that the automatic isolation valves of the PSW System will automatically switch to the safety or emergency position to provide cooling water exclusively to the safety related equipment during an accident event. This is demonstrated by the use of an actual or simulated initiation signal. This SR also verifies the automatic start capability (on a LOCA or LOSP signal) of one of the two PSW pumps in each subsystem. *The SR excludes automatic valves that are locked, sealed, or otherwise secured in the actuated position. The SR does not apply to valves that are locked, sealed, or otherwise secured in the actuated position since the affected valves were verified to be in the actuated position prior to being locked, sealed, or otherwise secured. Placing an automatic valve in a locked, sealed, or otherwise secured position requires an assessment of the operability of the system or any supported systems, including whether it is necessary for the valve to be repositioned to the non-actuated position to support the accident analysis. Restoration of an automatic valve to the non-actuated position requires verification that the SR has been met within its required Frequency.*

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

REFERENCES

1. FSAR, Section 9.2.1.

2. FSAR, Chapter 6.

3. FSAR, Chapter 15.

4. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

BASES (continued)

SURVEILLANCE REQUIREMENTS

SR 3.7.4.1

This SR verifies that a subsystem in a standby mode starts on demand and continues to operate. Standby systems should be checked periodically to ensure that they start and function properly. As the environmental and normal operating conditions of this system are not severe, testing each subsystem once every 31 days provides an adequate check on this system. Since the MCREC System does not have heaters, each subsystem need only be operated for ≥ 15 minutes to demonstrate the function of the subsystem. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.7.4.2

This SR verifies that the required MCREC testing is performed in accordance with the Ventilation Filter Testing Program (VFTP). The VFTP includes testing HEPA filter performance, charcoal adsorber efficiency, minimum system flow rate, and the physical properties of the activated charcoal (general use and following specific operations). Specific test Frequencies and additional information are discussed in detail in the VFTP.

SR 3.7.4.3

This SR verifies that on an actual or simulated initiation signal, each MCREC subsystem starts and operates. The LOGIC SYSTEM FUNCTIONAL TEST in SR 3.3.7.1.4 overlaps this SR to provide complete testing of the safety function. *The SR excludes automatic dampers and valves that are locked, sealed, or otherwise secured in the actuated position. The SR does not apply to dampers or valves that are locked, sealed, or otherwise secured in the actuated position since the affected dampers or valves were verified to be in the actuated position prior to being locked, sealed, or otherwise secured. Placing an automatic valve or damper in a locked, sealed, or otherwise secured position requires an assessment of the operability of the system or any supported systems, including whether it is necessary for the valve or damper to be repositioned to the non-actuated position to support the accident analysis. Restoration of an automatic valve or damper to the non-actuated position requires verification that the SR has been met within its required Frequency.* This Surveillance can be performed with the reactor at power. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

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Joseph M. Farley Nuclear Plant, Units 1 and 2
Edwin I. Hatch Nuclear Plant, Units 1 and 2
Vogtle Electric Generating Plant, Units 1 and 2
License Amendment Request to Revise
Technical Specifications to Adopt TSTF-541, Revision 2, "Add Exceptions to Surveillance Requirements for Valves and Dampers Locked in the Actuated Position"

Attachment 3c

VEGP Proposed Technical Specification Bases Changes (Mark-Up) for Information Only

BASES

SURVEILLANCE REQUIREMENTS

SR 3.7.10.2 (continued)

Operations with the heater control circuit energized allows the heaters to operate as necessary to reduce the humidity in the ambient air and ensure excessive moisture (> 70% relative humidity) is removed from the adsorber and HEPA filters. Flow (FI-12191, FI-12192) through the HEPA filters and charcoal adsorbers is verified. Operation with the heater control circuit energized for ≥ 15 continuous minutes demonstrates OPERABILITY of the system. Periodic operation ensures that heater failure, blockage, fan or motor failure, or excessive vibration can be detected for corrective action. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.7.10.3

This SR verifies that the required CREFS testing is performed in accordance with the Ventilation Filter Testing Program (VFTP). The CREFS filter tests are in accordance with Regulatory Guide 1.52 (Ref. 4). The VFTP includes testing the performance of the HEPA filter, charcoal adsorber efficiency, minimum flow rate, and the physical properties of the activated charcoal. Specific test Frequencies and additional information are discussed in detail in the VFTP.

SR 3.7.10.4

This SR verifies that each CREFS train starts and operates on an actual or simulated actuation signal. *The SR excludes automatic dampers and valves that are locked, sealed, or otherwise secured in the actuated position. The SR does not apply to dampers or valves that are locked, sealed, or otherwise secured in the actuated position since the affected dampers or valves were verified to be in the actuated position prior to being locked, sealed, or otherwise secured. Placing an automatic valve or damper in a locked, sealed, or otherwise secured position requires an assessment of the operability of the system or any supported systems, including whether it is necessary for the valve or damper to be repositioned to the non-actuated position to support the accident analysis. Restoration of an automatic valve or damper to the non-actuated position requires verification that the SR has been met within its required Frequency.* The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.7.10.5

(continued)

BASES (continued)

SURVEILLANCE REQUIREMENTS

SR 3.7.13.1

Standby systems should be checked periodically to ensure that they function properly. As the environmental and normal operating conditions on this system are not severe, testing each train once every month provides an adequate check on this system. Flow (FI-12629 and FI-12542) through the HEPA and charcoal filters is verified. Systems that do not take credit for humidity control (heaters) need only be operated for ≥ 15 minutes to demonstrate the function of the system. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.7.13.2

This SR verifies that the required PPAFES testing is performed in accordance with the Ventilation Filter Testing Program (VFTP). The PPAFES filter tests are in accordance with Regulatory Guide 1.52 (Ref. 5). The VFTP includes testing HEPA filter performance, charcoal adsorber efficiency, minimum system flow rate, and the physical properties of the activated charcoal (general use and following specific operations). Specific test frequencies and additional information are discussed in detail in the VFTP.

SR 3.7.13.3

This SR verifies that each PPAFES starts and operates on an actual or simulated containment ventilation isolation signal. *The SR excludes automatic dampers and valves that are locked, sealed, or otherwise secured in the actuated position. The SR does not apply to dampers or valves that are locked, sealed, or otherwise secured in the actuated position since the affected dampers or valves were verified to be in the actuated position prior to being locked, sealed, or otherwise secured. Placing an automatic valve or damper in a locked, sealed, or otherwise secured position requires an assessment of the operability of the system or any supported systems, including whether it is necessary for the valve or damper to be repositioned to the non-actuated position to support the accident analysis. Restoration of an automatic valve or damper to the non-actuated position requires verification that the SR has been met within its required Frequency.* The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.7.13.4

(continued)