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U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555-0001

Southern Nuclear Operating Company
Farley Nuclear Plant Units 1&2
Vogtle Electric Generating Plant Units 1&2
Adoption of TSTF-269-A, Revision 2, “Allow Administrative Means of
Position Verification for Locked or Sealed Valves”

Ladies and Gentlemen:

Pursuant to 10 CFR 50.90, Southern Nuclear Operating Company (SNC) hereby requests a license amendment to the Joseph M. Farley Nuclear Plant (FNP) Unit 1 Renewed Facility Operating License (RFOL) NPF-2 and Unit 2 RFOL NPF-8, and the Vogtle Electric Generating Plant (VEGP) Unit 1 RFOL NPF-68 and Unit 2 RFOL NPF-81. The proposed amendment is consistent with NRC-approved Technical Specification Task Force (TSTF) Traveler 269-A, Revision 2, “Allow Administrative Means of Position Verification for Locked or Sealed Valves.”

The proposed changes modify Technical Specification (TS) 3.6.3, “Containment Isolation Valves.” Consistent with TSTF-269-A, Notes would be added to allow isolation devices that are locked, sealed or otherwise secured be verified by use of administrative means.

Approval of the proposed amendment is requested within one year of completion of the NRC’s acceptance review. Once approved, the amendment shall be implemented within 60 days.

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

This letter contains no regulatory commitments. If you have any questions, please contact Ryan Joyce at 205.992.6468.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 22nd day of December 2021.

Respectfully submitted,



C. A. Gayheart
Director, Regulatory Affairs
Southern Nuclear Operating Company

CAG/agq/cbg

Enclosure: Evaluation of the Proposed Changes

Attachments: 1a. Farley Proposed Technical Specification Changes (Marked-up Pages)
1b. Vogtle Proposed Technical Specification Changes (Marked-up Pages)
2a. Farley Revised Technical Specification Pages
2b. Vogtle Revised Technical Specification Pages
3a. Farley Proposed Technical Specification Bases Changes (Marked-up Pages) for Information Only
3b. Vogtle Proposed Technical Specification Bases Changes (Marked-up Pages) for Information Only

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

ENCLOSURE

**Farley Nuclear Plant – Units 1 and 2
Vogtle Electric Generating Plant – Units 1 and 2**

**Adoption of TSTF-269-A, Revision 2, “Allow Administrative Means of
Position Verification for Locked or Sealed Valves”**

Evaluation of the Proposed Changes

1 SUMMARY DESCRIPTION

Southern Nuclear Operating Company (SNC) hereby requests a license amendment to the Joseph M. Farley Nuclear Plant (FNP) Unit 1 Renewed Facility Operating License (RFOL) NPF-2 and Unit 2 RFOL NPF-8, and the Vogtle Electric Generating Plant (VEGP) Unit 1 RFOL NPF-68 and Unit 2 RFOL NPF-81. The proposed amendment is consistent with NRC-approved Technical Specification Task Force (TSTF) Traveler 269-A, Revision 2, "Allow Administrative Means of Position Verification for Locked or Sealed Valves" (Reference 1).

The proposed changes modify Technical Specification (TS) 3.6.3, "Containment Isolation Valves." Consistent with TSTF-269-A, Notes would be added to allow isolation devices that are locked, sealed or otherwise secured be verified by use of administrative means.

2 DETAILED DESCRIPTION

2.1 Description of the Proposed Change

The proposed change modifies TS 3.6.3, "Containment Isolation Valves." This specification requires penetration flow paths with inoperable isolation devices be isolated and periodically verified to be isolated. Consistent with TSTF-269-A, Revision 2, notes are proposed to be added to FNP TS 3.6.3, Required Actions A.2, C.2 and D.2, and VEGP TS 3.6.3, Required Actions A.2 and C.2, to allow isolation devices that are locked, sealed, or otherwise secured to be verified using administrative means.

SNC is proposing the following variations from the TS changes described in TSTF-269-A. There are two differences in the Required Action identifiers between TSTF-269-A and the FNP TS and the VEGP TS. TSTF-269-A identifies a change to TS 3.6.3 Required Action E.2. The equivalent action in the FNP TS is Required Action D.2. The equivalent Required Action in the VEGP TS is C.2. These Required Actions are equivalent, and the identifier differences do not affect the applicability of TSTF-269-A to FNP or VEGP. In addition, the VEGP TS do not contain a Condition equivalent to Condition C in TSTF-269-A. Therefore, that change is not applicable to VEGP.

3 TECHNICAL EVALUATION

3.1 Summary of the Approved Traveler Justification

The purpose of the periodic verification that a penetration with an inoperable isolation valve continues to be isolated is to detect and correct inadvertent repositioning of the isolation device. However, the function of locking, sealing, or securing an isolation device is to ensure that the device is not inadvertently repositioned. Therefore, it is sufficient to assume that the initial establishment of component status (e.g., isolation valves closed) was performed correctly and subsequent periodic re-verification need only be a verification of the administrative control that ensures that the component remains in the required state. It is unnecessary and undesirable to remove the lock, seal, or other means of securing the component solely to perform an active verification of the required state as it would increase the chance of mispositioning due to the frequent manipulation.

The justification presented in approved Traveler TSTF-269-A is applicable to FNP and VEGP. The Traveler is being adopted by FNP and VEGP with no changes beyond that described above in Section 2.1.

The NRC implemented the approved Traveler, and its contents are reflected in NUREG-1431, Revision 5.

4 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

The proposed change has been evaluated to determine whether applicable regulations and requirements continue to be met.

The regulations of Title 10 of the Code of Federal Regulations (10 CFR) 50.36, "Technical Specifications," establish the requirements related to the content of the Technical Specifications. Section 50.36(c)(2) states: "*When a limiting condition for operation of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the technical specifications until the condition can be met.*" There is no regulatory requirement that specifies what remedial actions are to be taken when a limiting condition for operation is not met. The proposed changes remove an operational restriction not needed for safety. The proposed changes are consistent with the Standard Westinghouse Technical Specifications (i.e., NUREG-1431).

4.2 Precedent

Precedent for a plant-specific NRC approval of the changes in TSTF-269-A includes:

- Brunswick Steam Electric Plant (Reference 2)

4.3 No Significant Hazard Consideration Determination Analysis

Southern Nuclear Operating Company (SNC) has evaluated the proposed changes to the Technical Specifications using the criteria in 10 CFR 50.92 and has determined that the proposed changes do not involve a significant hazards consideration.

The proposed amendment is consistent with NRC-approved Technical Specification Task Force (TSTF) Traveler 269-A, Revision 2, "Allow Administrative Means of Position Verification for Locked or Sealed Valves." The proposed changes modify Farley Nuclear Plant (FNP) and Vogtle Electric Generating Plant (VEGP) Technical Specification (TS) 3.6.3, "Containment Isolation Valves" by adding Notes to allow isolation devices that are locked, sealed or otherwise secured be verified by use of administrative means.

As required by 10 CFR 50.91(a), the SNC analysis of the issue of no significant hazards consideration is presented below:

- 1) Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The proposed change modifies TS 3.6.3, "Containment Isolation Valves." This specification requires penetration flow paths with inoperable isolation devices be isolated and periodically verified to be isolated. Consistent with TSTF-269-A, Revision 2, Notes are proposed to be added to FNP TS 3.6.3, Required Actions A.2, C.2 and D.2, and VEGP TS 3.6.3, Required Actions A.2 and C.2, to allow isolation devices that are locked, sealed, or otherwise secured to be verified using administrative means. The proposed change does not affect any plant equipment, test methods, or plant operation, and is not an initiator of any analyzed accident

sequence. The inoperable containment penetrations will continue to be isolated, and hence perform their isolation function. Operation in accordance with the proposed Technical Specifications will ensure that all analyzed accidents will continue to be mitigated as previously analyzed.

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

- 2) Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed changes do not involve a physical alteration to the plant (i.e., no new or different type of equipment will be installed) or a change to the methods governing normal plant operation. The changes do not alter the assumptions made in the safety analysis.

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 change involve a significant reduction in a margin of safety?

Response: No

The proposed change will not affect operation of plant equipment or the function of any equipment assumed in the accident analysis. Affected containment penetrations will continue to be isolated as required by the existing Technical Specifications.

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

4.4 Conclusion

In conclusion, based on the considerations discussed above, SNC concludes: (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 the health and safety of the public.

5 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 Part 20, and 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 effluent 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. Accordingly, the

amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6 REFERENCES

1. Technical Specification Task Force (TSTF)-269-A, Rev 2, "Allow Administrative Means of Position Verification for Locked or Sealed Valves," approved July 26, 1999.
2. Letter from Nuclear Regulatory Commission to Brunswick Steam Electric Plant, "Issuance Of Amendment Nos. 296 And 324 To Adopt Technical Specification Task Force Traveler TSTF-269-A, Revision 2, "Allow Administrative Means Of Position Verification For Locked Or Sealed Valves," dated November 21, 2019 [ML19281A330].

**Southern Nuclear Operating Company
Farley Nuclear Plant – Units 1 and 2**

**Adoption of TSTF-269-A, Revision 2, “Allow Administrative Means of Position Verification
for Locked or Sealed Valves”**

Attachment 1a

Proposed Technical Specification Changes (Marked-up Pages)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>A. -----NOTE----- Only applicable to penetration flow paths with two containment isolation valves. ----- One or more penetration flow paths with one containment isolation valve inoperable except for purge valve penetration leakage not within limit.</p>	<p>A.1 Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured.</p> <p><u>AND</u></p> <p>A.2 -----NOTES----- <u>1.</u> Isolation devices in high radiation areas may be verified by use of administrative means. <u>2. Isolation devices that are locked, sealed, or otherwise secured may be verified by use of administrative means.</u> ----- Verify the affected penetration flow path is isolated.</p>	<p>4 hours</p> <p><u>OR</u></p> <p>In accordance with the Risk Informed Completion Time Program</p> <p>Once per 31 days for isolation devices outside containment</p> <p><u>AND</u></p> <p>Prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days for isolation devices inside containment</p>

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>C. -----NOTE----- Only applicable to penetration flow paths with only one containment isolation valve and a closed system. ----- One or more penetration flow paths with one containment isolation valve inoperable.</p>	<p>C.1 Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, or blind flange.</p> <p><u>AND</u></p> <p>C.2 -----NOTES----- <u>1.</u> Isolation devices in high radiation areas may be verified by use of administrative means. <u>2. Isolation devices that are locked, sealed, or otherwise secured may be verified by use of administrative means.</u> ----- Verify the affected penetration flow path is isolated.</p>	<p>72 hours</p> <p><u>OR</u></p> <p>In accordance with the Risk Informed Completion Time Program</p> <p>Once per 31 days</p>

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>D. One or more penetration flow paths containing containment purge valves, with penetration leakage such that the sum of the leakage for all Type B and C tests is not within limits.</p>	<p>D.1 Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, or blind flange.</p> <p><u>AND</u></p> <p>D.2 -----NOTES----- <u>1.</u> Isolation devices in high radiation areas may be verified by use of administrative means. <u>2.</u> <u>Isolation devices that are locked, sealed, or otherwise secured may be verified by use of administrative means.</u> ----- Verify the affected penetration flow path is isolated.</p> <p><u>AND</u></p>	<p>24 hours</p> <p>Once per 31 days for isolation devices outside containment</p> <p><u>AND</u></p> <p>Prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days for isolation devices inside containment</p> <p>(continued)</p>

**Southern Nuclear Operating Company
Vogtle Electric Generating Plant – Units 1 and 2**

**Adoption of TSTF-269-A, Revision 2, "Allow Administrative Means of Position Verification
for Locked or Sealed Valves"**

Attachment 1b

Proposed Technical Specification Changes (Marked-up Pages)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	<p>A.2</p> <p>-----NOTES-----</p> <p><u>1.</u> Isolation devices in high radiation areas may be verified by use of administrative means.</p> <p><u>2.</u> <u>Isolation devices that are locked, sealed, or otherwise secured may be verified by use of administrative means.</u></p> <p>-----</p> <p>Verify the affected penetration flow path is isolated.</p>	<p>Once per 31 days for isolation devices outside containment</p> <p><u>AND</u></p> <p>Prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days for isolation devices inside containment</p>

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>C. -----NOTES----- 1. Not applicable when the second containment purge valve is intentionally made inoperable. 2. The following Section 5.5.22 constraints are applicable: parts b, c.2, c.3, d, e, f, g, and h. ----- One or more penetration flow paths with one or more containment purge valves not within purge valve leakage limits. -----</p>	<p>C.1 Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, or blind flange.</p> <p><u>AND</u></p> <p>C.2 -----NOTES----- 1. Isolation devices in high radiation areas may be verified by use of administrative means. 2. <u>Isolation devices that are locked, sealed, or otherwise secured may be verified by use of administrative means.</u> -----</p> <p>Verify the affected penetration flow path is isolated.</p>	<p>24 hours</p> <p><u>OR</u></p> <p>In accordance with the Risk Informed Completion Time Program</p> <p>Once per 31 days for isolation devices outside containment</p> <p><u>AND</u></p> <p>Prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days for isolation devices inside containment</p>

(continued)

**Southern Nuclear Operating Company
Farley Nuclear Plant – Units 1 and 2**

**Adoption of TSTF-269-A, Revision 2, "Allow Administrative Means of Position Verification
for Locked or Sealed Valves"**

Attachment 2a

Revised Technical Specification Changes

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>A. -----NOTE----- Only applicable to penetration flow paths with two containment isolation valves. ----- One or more penetration flow paths with one containment isolation valve inoperable except for purge valve penetration leakage not within limit.</p>	<p>A.1 Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured.</p> <p><u>AND</u></p> <p>A.2 -----NOTES----- 1. Isolation devices in high radiation areas may be verified by use of administrative means. 2. Isolation devices that are locked, sealed, or otherwise secured may be verified by use of administrative means. ----- Verify the affected penetration flow path is isolated.</p>	<p>4 hours</p> <p><u>OR</u></p> <p>In accordance with the Risk Informed Completion Time Program</p> <p>Once per 31 days for isolation devices outside containment</p> <p><u>AND</u></p> <p>Prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days for isolation devices inside containment</p>

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>C. -----NOTE----- Only applicable to penetration flow paths with only one containment isolation valve and a closed system. ----- One or more penetration flow paths with one containment isolation valve inoperable.</p>	<p>C.1 Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, or blind flange.</p> <p><u>AND</u></p> <p>C.2 -----NOTES----- 1. Isolation devices in high radiation areas may be verified by use of administrative means. 2. Isolation devices that are locked, sealed, or otherwise secured may be verified by use of administrative means. ----- Verify the affected penetration flow path is isolated.</p>	<p>72 hours</p> <p><u>OR</u></p> <p>In accordance with the Risk Informed Completion Time Program</p> <p>Once per 31 days</p>

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>D. One or more penetration flow paths containing containment purge valves, with penetration leakage such that the sum of the leakage for all Type B and C tests is not within limits.</p>	<p>D.1 Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, or blind flange.</p> <p><u>AND</u></p> <p>D.2 -----NOTES----- 1. Isolation devices in high radiation areas may be verified by use of administrative means. 2. Isolation devices that are locked, sealed, or otherwise secured may be verified by use of administrative means. ----- Verify the affected penetration flow path is isolated.</p> <p><u>AND</u></p>	<p>24 hours</p> <p>Once per 31 days for isolation devices outside containment</p> <p><u>AND</u></p> <p>Prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days for isolation devices inside containment</p> <p>(continued)</p>

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. (continued)	D.3 Perform SR 3.6.3.5 for the penetrations containing resilient seal purge valves closed to comply with Required Action D.1.	Once per 92 days
E. Required Action and associated Completion Time of Condition A, B, C, or D not met.	E.1 Be in MODE 3.	6 hours
	<u>AND</u> E.2 Be in MODE 5.	36 hours
F. One or more penetration flow paths containing containment purge valves, with penetration leakage not within the penetration limits.	F.1 Reduce leakage to within limit.	Prior to entering MODE 4 from MODE 5 if the exiting leakage is determined during quarterly testing per SR 3.6.3.5. <u>OR</u> Prior to entering MODE 4 if excess leakage is determined during MODE 5 per SR 3.6.3.5

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.6.3.1 Verify each 48 inch purge valve is sealed closed, except for one purge valve in a penetration flow path while in Condition D of this LCO.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.3.2	<p>-----NOTE----- Valves and blind flanges in high radiation areas may be verified by use of administrative controls. -----</p> <p>Verify each containment isolation manual valve and blind flange that is located outside containment and not locked, sealed, or otherwise secured and required to be closed during accident conditions is closed, except for containment isolation valves that are open under administrative controls.</p>	In accordance with the Surveillance Frequency Control Program
SR 3.6.3.3	<p>-----NOTES-----</p> <ol style="list-style-type: none"> 1. Valves and blind flanges in high radiation areas may be verified by use of administrative means. 2. The blind flange on the fuel transfer canal flange is only required to be verified closed after each draining of the canal. <p>-----</p> <p>Verify each containment isolation manual valve and blind flange that is located inside containment and not locked, sealed, or otherwise secured and required to be closed during accident conditions is closed, except for containment isolation valves that are open under administrative controls.</p>	Prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days
SR 3.6.3.4	Verify the isolation time of each automatic power operated containment isolation valve in the INSERVICE TESTING PROGRAM is within limits.	In accordance with the INSERVICE TESTING PROGRAM

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.3.5	Perform leakage rate testing for containment penetrations containing containment purge valves with resilient seals.	In accordance with the Surveillance Frequency Control Program <u>AND</u> Within 92 days after opening the valve
SR 3.6.3.6	Verify each automatic containment isolation valve that is not locked, sealed or otherwise secured in position, actuates to the isolation position on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program

**Southern Nuclear Operating Company
Vogtle Electric Generating Plant – Units 1 and 2**

**Adoption of TSTF-269-A, Revision 2, "Allow Administrative Means of Position Verification
for Locked or Sealed Valves"**

Attachment 2b

Revised Technical Specification Changes

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	<p>A.2</p> <p>-----NOTES-----</p> <ol style="list-style-type: none"> 1. Isolation devices in high radiation areas may be verified by use of administrative means. 2. Isolation devices that are locked, sealed, or otherwise secured may be verified by use of administrative means. <p>-----</p> <p>Verify the affected penetration flow path is isolated.</p>	<p>Once per 31 days for isolation devices outside containment</p> <p><u>AND</u></p> <p>Prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days for isolation devices inside containment</p>

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>B. -----NOTES----- 1. Not applicable when the second containment isolation valve is intentionally made inoperable. 2. The following Section 5.5.22 constraints are applicable: parts b, c.2, c.3, d, e, f, g, and h. ----- One or more penetration flow paths with two containment isolation valves inoperable except for purge valve leakage not within limit.</p>	<p>B.1 Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, or blind flange.</p>	<p>1 hour <u>OR</u> In accordance with the Risk Informed Completion Time Program</p>

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>C. -----NOTES----- 1. Not applicable when the second containment purge valve is intentionally made inoperable. 2. The following Section 5.5.22 constraints are applicable: parts b, c.2, c.3, d, e, f, g, and h. ----- One or more penetration flow paths with one or more containment purge valves not within purge valve leakage limits. -----</p>	<p>C.1 Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, or blind flange.</p> <p><u>AND</u></p> <p>C.2 -----NOTES----- 1. Isolation devices in high radiation areas may be verified by use of administrative means. 2. Isolation devices that are locked, sealed, or otherwise secured may be verified by use of administrative means. ----- Verify the affected penetration flow path is isolated.</p>	<p>24 hours</p> <p><u>OR</u></p> <p>In accordance with the Risk Informed Completion Time Program</p> <p>Once per 31 days for isolation devices outside containment</p> <p><u>AND</u></p> <p>Prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days for isolation devices inside containment</p>

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action and associated Completion Time not met.	D.1 Be in MODE 3.	6 hours
	<u>AND</u>	
	D.2 Be in MODE 5.	36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.3.1	Verify each 24 inch purge valve is sealed closed, except for one purge valve in a penetration flow path while in Condition D of this LCO.	In accordance with the Surveillance Frequency Control Program
SR 3.6.3.2	Verify each 14 inch purge valve is closed, except when the associated penetration(s) is (are) permitted to be open for purge or venting operations and purge system surveillance and maintenance testing under administrative control.	In accordance with the Surveillance Frequency Control Program
SR 3.6.3.3	<p>-----NOTE-----</p> <p>Valves and blind flanges in high radiation areas may be verified by use of administrative controls.</p> <p>-----</p> <p>Verify each containment isolation manual valve and blind flange that is located outside containment and not locked, sealed, or otherwise secured and required to be closed during accident conditions is closed, except for containment isolation valves that are open under administrative controls.</p>	In accordance with the Surveillance Frequency Control Program

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.6.3.4	<p>-----NOTES-----</p> <ol style="list-style-type: none"> 1. Valves and blind flanges in high radiation areas may be verified by use of administrative means. 2. The fuel transfer tube blind flange is only required to be verified closed once after refueling prior to entering MODE 4 from MODE 5. <p>-----</p> <p>Verify each containment isolation manual valve and blind flange that is located inside containment and not locked, sealed, or otherwise secured and required to be closed during accident conditions is closed, except for containment isolation valves that are open under administrative controls.</p>	Prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days
SR 3.6.3.5	Verify the isolation time of each automatic power operated containment isolation valve is within limits.	In accordance with the INSERVICE TESTING PROGRAM
SR 3.6.3.6	Perform leakage rate testing for containment purge valves with resilient seals.	In accordance with the Surveillance Frequency Control Program
SR 3.6.3.7	Verify each automatic containment isolation valve that is not locked, sealed, or otherwise secured in position, actuates to the isolation position on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program

**Southern Nuclear Operating Company
Farley Nuclear Plant – Units 1 and 2**

**Adoption of TSTF-269-A, Revision 2, "Allow Administrative Means of Position Verification
for Locked or Sealed Valves"**

Attachment 3a

**Proposed Technical Specification Bases Changes (Marked-up Pages)
For Information Only**

BASES

ACTIONS

A.1 and A.2 (continued)

Required Action A.2 is modified by [two](#) Notes. [Note 1](#) ~~that~~ applies to isolation devices located in high radiation areas and allows these devices to be verified closed by use of administrative means. Allowing verification by administrative means is considered acceptable, since access to these areas is typically restricted. [Note 2 applies to isolation devices that are locked, sealed, or otherwise secured in position and allows these devices to be verified closed by use of administrative means. Allowing verification by administrative means is considered acceptable, since the function of locking, sealing, or securing components is to ensure that these devices are not inadvertently repositioned.](#) Therefore, the probability of misalignment of these devices, once they have been verified to be in the proper position, is small.

B.1

With two containment isolation valves in one or more penetration flow paths inoperable, the affected penetration flow path must be isolated within 1 hour. The method of isolation must include the use of at least one isolation barrier that cannot be adversely affected by a single active failure. Isolation barriers that meet this criterion are a closed and de-activated automatic valve, a closed manual valve, and a blind flange. The 1 hour Completion Time is consistent with the ACTIONS of LCO 3.6.1. Alternatively, a Completion Time can be determined using the Risk Informed Completion Time Program (Ref. 6). In the event the affected penetration is isolated in accordance with Required Action B.1, the affected penetration must be verified to be isolated on a periodic basis per Required Action A.2, which remains in effect. This periodic verification is necessary to assure leak tightness of containment and that penetrations requiring isolation following an accident are isolated. The Completion Time of once per 31 days for verifying each affected penetration flow path is isolated is appropriate considering the fact that the valves are operated under administrative control and the probability of their misalignment is low.

Condition B is modified by two Notes. The first Note states the Condition is only applicable to penetrations with two containment isolation valves. The second Note states RICT entry is not permitted for this loss of function Condition when the second containment isolation valve is intentionally made inoperable. The RICT program cannot be used for the voluntary removal of systems or components which would result in a loss of safety function. RICT entry is only permitted for situations where a second containment isolation valve is found inoperable or when both isolation valves are simultaneously

(continued)

BASES

ACTIONS

C.1 and C.2 (continued)

Required Action C.2 is modified by ~~atwo~~ Notes. Note 1 ~~that~~ applies to valves and blind flanges located in high radiation areas and allows these devices to be verified closed by use of administrative means. Allowing verification by administrative means is considered acceptable, since access to these areas is typically restricted. Note 2 applies to isolation devices that are locked, sealed, or otherwise secured in position and allows these devices to be verified closed by use of administrative means. Allowing verification by administrative means is considered acceptable, since the function of locking, sealing, or securing components is to ensure that these devices are not inadvertently repositioned. Therefore, the probability of misalignment of these valves, once they have been verified to be in the proper position, is small.

D.1, D.2, and D.3

In the event one or more penetration flow paths containing containment purge valves, have penetration leakage such that the sum of the leakage for all Type B and C tests is not within limits, purge valve penetration leakage must be restored such that the overall Type B and C testing limit is not exceeded, or the affected penetration flow path must be isolated. The method of isolation must be by the use of at least one isolation barrier that cannot be adversely affected by a single active failure. Isolation barriers that meet this criterion are a closed and de-activated automatic valve, closed manual valve, or blind flange. A purge valve with resilient seals utilized to satisfy Required Action D.1 must have been demonstrated to support the penetration meeting the leakage requirements of SR 3.6.3.5. The specified Completion Time is reasonable, considering that one containment purge valve remains closed so that a gross breach of containment does not exist.

In accordance with Required Action D.2, this penetration flow path must be verified to be isolated on a periodic basis. The periodic verification is necessary to ensure that containment penetrations required to be isolated following an accident, which are no longer capable of being automatically isolated, will be in the isolation position should an event occur. This Required Action does not require any testing or valve manipulation. Rather, it involves verification, through a system walkdown, that those isolation devices outside containment capable of being mispositioned are in the correct position. For the isolation devices inside containment, the time period specified as "prior to entering MODE 4 from MODE 5 if not performed within the previous

(continued)

BASES

ACTIONS

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

For the containment penetration containing a containment purge valve with resilient seal that is isolated in accordance with Required Action D.1, SR 3.6.3.5 must be performed at least once every 92 days. This assures that degradation of the resilient seal is detected and confirms that the leakage rate of the containment purge valve penetration does not increase during the time the penetration is isolated. Since more reliance is placed on a single valve while in this Condition, it is prudent to perform the SR more often. Therefore, a Frequency of once per 92 days was chosen and has been shown to be acceptable based on operating experience.

Required Action D.2 is modified by two Notes. Note 1 applies to isolation devices located in high radiation areas and allows these devices to be verified closed by use of administrative means. Allowing verification by administrative means is considered acceptable, since access to these areas is typically restricted. Note 2 applies to isolation devices that are locked, sealed, or otherwise secured in position and allows these devices to be verified closed by use of administrative means. Allowing verification by administrative means is considered acceptable, since the function of locking, sealing, or securing components is to ensure that these devices are not inadvertently repositioned.

E.1 and E.2

If the Required Actions and associated Completion Times of Condition A, B, C, or D are not met, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

F.1

In the event one or more penetration flow paths containing containment purge valves have penetration leakage which exceeds the individual purge valve penetration leakage limit, purge valve penetration leakage must be reduced to within the limit prior to the next time that the unit transitions from MODE 5 to MODE 4. Provided that the penetration flow path leakage does not cause the total leakage

(continued)

**Southern Nuclear Operating Company
Vogtle Electric Generating Plant – Units 1 and 2**

**Adoption of TSTF-269-A, Revision 2, "Allow Administrative Means of Position Verification
for Locked or Sealed Valves"**

Attachment 3b

**Proposed Technical Specification Bases Changes (Marked-up Pages)
For Information Only**

BASES

ACTIONS

A.1 and A.2 (continued)

Required Action A.2 is modified by two Notes. Note 1 ~~that~~ applies to isolation devices located in high radiation areas and allows these valves to be verified closed by use of administrative means. Allowing verification by administrative means is considered acceptable, since access to these areas is typically restricted. Note 2 applies to isolation devices that are locked, sealed, or otherwise secured in position and allows these devices to be verified closed by use of administrative means. Allowing verification by administrative means is considered acceptable, since the function of locking, sealing, or securing components is to ensure that these devices are not inadvertently repositioned. Therefore, the probability of misalignment, once they have been verified to be in the proper position, is small.

B.1

With two containment isolation valves in one or more penetration flow paths inoperable, the affected penetration flow path must be isolated within 1 hour. The method of isolation must include the use of at least one isolation barrier that cannot be adversely affected by a single active failure. Isolation barriers that meet this criterion are a closed and de-activated automatic valve, a closed manual valve, and a blind flange. The 1 hour Completion Time is consistent with the ACTIONS of LCO 3.6.1. Alternatively, a Completion Time can be determined in accordance with the Risk Informed Completion Time Program. In the event the affected penetration is isolated in accordance with Required Action B.1, the affected penetration must be verified to be isolated on a periodic basis per Required Action A.2, which remains in effect. This periodic verification is necessary to assure that penetrations requiring isolation following an accident are isolated. The Completion Time of once per 31 days for verifying each affected penetration flow path is isolated is appropriate considering the fact that the valves are operated under administrative control and the probability of their misalignment is low.

CONDITION B is modified by two Notes. The first Note states it is not applicable when the second containment isolation valve is intentionally made inoperable. This Required Action is not intended for voluntary removal of redundant systems or components from service. The Required Action for two containment isolation valves inoperable is only intended when the second containment isolation valve is found inoperable and the first valve in the line is already

(continued)

BASES

ACTIONS

B.1 (continued)

inoperable, or when both valves are found inoperable at the same time. The second Note indicates the parts of Section 5.5.22, "Risk Informed Completion Time Program", which are applicable to this LCO Condition. The Risk Informed Completion Time for this LCO Condition can be no longer than 24 hours (Ref. 4).

C.1, C.2, and C.3

In the event one or more containment purge valves in one or more penetration flow paths are not within the purge valve leakage limits, purge valve leakage must be restored to within limits, or the affected penetration flow path must be isolated. The method of isolation must be by the use of at least one isolation barrier that cannot be adversely affected by a single active failure. Isolation barriers that meet this criterion are a closed and de-activated automatic valve, closed manual valve, or blind flange. The specified Completion Time is reasonable, considering that one containment purge valve remains closed so that a gross breach of containment does not exist.

In accordance with Required Action C.2, this penetration flow path must be verified to be isolated on a periodic basis. The periodic verification is necessary to ensure that containment penetrations required to be isolated following an accident, which are no longer capable of being automatically isolated, will be in the isolation position should an event occur. This Required Action does not require any testing or valve manipulation. Rather, it involves verification, through a system walkdown, that those isolation devices outside containment capable of being mispositioned are in the correct position. For the isolation devices inside containment, the time period specified as "prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days" is based on engineering judgment and is considered reasonable in view of the inaccessibility of the isolation devices and other administrative controls that will ensure that isolation device misalignment is an unlikely possibility.

[Required Action C.2 is modified by two Notes. Note 1 applies to isolation devices located in high radiation areas and allows these devices to be verified closed by use of administrative means. Allowing verification by administrative means is considered acceptable, since access to these areas is typically restricted. Note 2](#)

(continued)

BASES

ACTIONS

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

applies to isolation devices that are locked, sealed, or otherwise secured in position and allows these devices to be verified closed by use of administrative means. Allowing verification by administrative means is considered acceptable, since the function of locking, sealing, or securing components is to ensure that these devices are not inadvertently repositioned.

Condition C is modified by two Notes. The first Note states it is not applicable when the second containment purge valve is intentionally made inoperable. The Required Action for two containment purge valves inoperable is not intended for voluntary removal of redundant systems or components from service. The Required Action is only intended if the second containment purge valve is found inoperable and the first purge valve in the line is already inoperable or if both containment purge valves were found inoperable at the same time. The second Note indicates the parts of Section 5.5.22, "Risk Informed Completion Time Program", which are applicable to this LCO Condition. The Risk Informed Completion Time for this LCO Condition can be no longer than 24 hours (Ref. 4).

D.1, and D.2

If the Required Actions and associated Completion Times are not met, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE
REQUIREMENTS

SR 3.6.3.1
(HV-2626A, HV-2627A, HV-2628A, HV-2629A)

Each 24 inch containment purge valve is required to be verified sealed closed. This Surveillance is designed to ensure that a gross breach of containment is not caused by an inadvertent or spurious opening of a containment purge valve. Detailed analysis of the purge valves failed to conclusively demonstrate their ability to close during

(continued)