CP&L

Carolina Power & Light Company
P.O. Box 10429
Southport, NC 28461-0429

SEP 1 8 2000

SERIAL: BSEP 00-0140

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

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62
SUBMITTAL OF TECHNICAL SPECIFICATION BASES CHANGE

Gentlemen:

In accordance with Technical Specification (TS) 5.5.10 for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2, Carolina Power & Light (CP&L) Company is submitting a revision made to the BSEP TS Bases on September 8, 2000. TS 5.5.10, "Technical Specifications (TS) Bases Control Program," Item d, requires changes to the TS Bases, implemented without prior NRC approval, to be provided to the NRC on a frequency consistent with 10 CFR 50.71(e). However, to support NRC access to the most up-to-date TS Bases, CP&L is instead submitting changes to the TS Bases, implemented without prior NRC approval, more frequently than required by 10 CFR 50.71(e).

A summary of the enclosed TS Bases change is provided in Enclosure 1. Instructions for replacement of TS Bases pages affected by the change are provided in Enclosure 2. Replacement TS Bases pages are provided in Enclosure 3.

This submittal does not contain any regulatory commitments. Please refer any questions regarding this submittal to Mr. Leonard R. Beller, Supervisor - Licensing, at (910) 457-2073.

Sincerely,

Warren J. Dorman
Manager - Regulatory Affairs
Brunswick Steam Electric Plant

A001

WRM/wrm

Enclosures:
1. Summary of Change to Technical Specification Bases (September 8, 2000)
2. Technical Specification Bases Page Replacement Instructions
3. Replacement Technical Specification Bases Pages – BSEP, Unit Nos. 1 and 2

cc (with enclosures):

U. S. Nuclear Regulatory Commission, Region II
ATTN: Mr. Luis A. Reyes, Regional Administrator
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW, Suite 23T85
Atlanta, GA 30303-8931

U. S. Nuclear Regulatory Commission
ATTN: Mr. Theodore A. Easlick, NRC Senior Resident Inspector
8470 River Road
Southport, NC 28461-8869

U. S. Nuclear Regulatory Commission
ATTN: Mr. Allen G. Hansen (Mail Stop OWFN 8G9)
11555 Rockville Pike
Rockville, MD 20852-2738

Ms. Jo A. Sanford
Chair - North Carolina Utilities Commission
P.O. Box 29510
Raleigh, NC 27626-0510

Mr. Mel Fry
Director - Division of Radiation Protection
North Carolina Department of Environment and Natural Resources
3825 Barrett Drive
Raleigh, NC 27609-7221

ENCLOSURE 1

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62
SUBMITTAL OF TECHNICAL SPECIFICATION BASES CHANGE

Summary of Change to Technical Specification Bases (September 8, 2000)			
Rev. No.	Units Affected	Date Incorporated	Title/Description
Revision 12	Unit 1 and Unit 2	9/6/00	Title: High Pressure Coolant Injection (HPCI) and Reactor Core Isolation Cooling (RCIC) System Instrumentation Description: This revision changes the reference for the HPCI and RCIC high steam flow differential pressure "switches" to "instruments." This revision also corrects the discussion of instrumentation associated with the HPCI and RCIC Turbine Exhaust Diaphragm High Pressure instrumentation.

ENCLOSURE 2

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62
SUBMITTAL OF TECHNICAL SPECIFICATION BASES CHANGE

Technical Specification Bases Page Replacement Instructions

Bases, Unit 1 – B 2.0 – B 3.3 (Book 1)	
Remove	**Insert**
TS Bases Title Page, Revision 11	TS Bases Title Page, Revision 12
LOEP-1, Revision 11	LOEP-1, Revision 12
LOEP-3, Revision 5	LOEP-3, Revision 12
LOEP-4, Revision 4	LOEP-4, Revision 12
B 3.3-155, Revision 0	B 3.3-155, Revision 12
B 3.3-157, Revision 0	B 3.3-157, Revision 12

Bases, Unit 2 – B 2.0 – B 3.3 (Book 1)	
Remove	**Insert**
TS Bases Title Page, Revision 11	TS Bases Title Page, Revision 12
LOEP-1, Revision 11	LOEP-1, Revision 12
LOEP-3, Revision 5	LOEP-3, Revision 12
LOEP-4, Revision 4	LOEP-4, Revision 12
B 3.3-156, Revision 0	B 3.3-156, Revision 12
B 3.3-157, Revision 4	B 3.3-157, Revision 12
B 3.3-158, Revision 0	B 3.3-158, Revision 12

ENCLOSURE 3

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62
SUBMITTAL OF TECHNICAL SPECIFICATION BASES CHANGE

Replacement Technical Specification Bases Pages – BSEP, Unit Nos. 1 and 2

BASES

TO

THE FACILITY OPERATING LICENSE DPR-71

TECHNICAL SPECIFICATIONS

FOR

BRUNSWICK STEAM ELECTRIC PLANT

UNIT 1

CAROLINA POWER & LIGHT COMPANY

REVISION 12

LIST OF EFFECTIVE PAGES - BASES

Page No.	Revision No.	Page No.	Revision No.
Title Page	12	B 3.1-7	0
		B 3.1-8	0
List of Effective Pages - Book 1		B 3.1-9	0
		B 3.1-10	0
LOEP-1	12	B 3.1-11	0
LOEP-2	3	B 3.1-12	0
LOEP-3	12	B 3.1-13	0
LOEP-4	12	B 3.1-14	0
		B 3.1-15	0
i	0	B 3.1-16	0
ii	0	B 3.1-17	0
		B 3.1-18	0
B 2.0-1	0	B 3.1-19	0
B 2.0-2	0	B 3.1-20	0
B 2.0-3	0	B 3.1-21	0
B 2.0-4	10	B 3.1-22	0
B 2.0-5	0	B 3.1-23	0
B 2.0-6	0	B 3.1-24	0
B 2.0-7	0	B 3.1-25	0
B 2.0-8	0	B 3.1-26	0
		B 3.1-27	0
B 3.0-1	0	B 3.1-28	0
B 3.0-2	0	B 3.1-29	0
B 3.0-3	0	B 3.1-30	0
B 3.0-4	0	B 3.1-31	0
B 3.0-5	0	B 3.1-32	0
B 3.0-6	0	B 3.1-33	0
B 3.0-7	0	B 3.1-34	0
B 3.0-8	0	B 3.1-35	0
B 3.0-9	0	B 3.1-36	0
B 3.0-10	0	B 3.1-37	0
B 3.0-11	0	B 3.1-38	0
B 3.0-12	0	B 3.1-39	0
B 3.0-13	0	B 3.1-40	0
B 3.0-14	0	B 3.1-41	0
B 3.0-15	0	B 3.1-42	0
		B 3.1-43	0
B 3.1-1	0	B 3.1-44	0
B 3.1-2	0	B 3.1-45	0
B 3.1-3	0	B 3.1-46	0
B 3.1-4	0	B 3.1-47	0
B 3.1-5	0	B 3.1-48	0
B 3.1-6	0		

(continued)

LIST OF EFFECTIVE PAGES - BASES (continued)

Page No.	Revision No.	Page No.	Revision No.
B 3.3-73	0	B 3.3-115	0
B 3.3-74	0	B 3.3-116	0
B 3.3-75	0	B 3.3-117	0
B 3.3-76	0	B 3.3-118	0
B 3.3-77	3	B 3.3-119	0
B 3.3-78	3	B 3.3-120	0
B 3.3-79	3	B 3.3-121	0
B 3.3-80	3	B 3.3-122	0
B 3.3-81	3	B 3.3-123	0
B 3.3-82	3	B 3.3-124	0
B 3.3-83	3	B 3.3-125	0
B 3.3-84	3	B 3.3-126	0
B 3.3-85	3	B 3.3-127	0
B 3.3-86	0	B 3.3-128	0
B 3.3-87	0	B 3.3-129	0
B 3.3-88	0	B 3.3-130	0
B 3.3-89	0	B 3.3-131	0
B 3.3-90	0	B 3.3-132	0
B 3.3-91	0	B 3.3-133	0
B 3.3-92	0	B 3.3-134	0
B 3.3-93	0	B 3.3-135	0
B 3.3-94	0	B 3.3-136	0
B 3.3-95	0	B 3.3-137	0
B 3.3-96	0	B 3.3-138	0
B 3.3-97	0	B 3.3-139	0
B 3.3-98	0	B 3.3-140	0
B 3.3-99	0	B 3.3-141	0
B 3.3-100	0	B 3.3-142	0
B 3.3-101	0	B 3.3-143	0
B 3.3-102	0	B 3.3-144	0
B 3.3-103	0	B 3.3-145	0
B 3.3-104	0	B 3.3-146	0
B 3.3-105	0	B 3.3-147	0
B 3.3-106	0	B 3.3-148	0
B 3.3-107	0	B 3.3-149	0
B 3.3-108	0	B 3.3-150	0
B 3.3-109	0	B 3.3-151	0
B 3.3-110	0	B 3.3-152	0
B 3.3-111	0	B 3.3-153	5
B 3.3-112	0	B 3.3-154	0
B 3.3-113	0	B 3.3-155	12
B 3.3-114	0	B 3.3-156	4

(continued)

LIST OF EFFECTIVE PAGES - BASES (continued)

Page No.	Revision No.	Page No.	Revision No.
B 3.3-157	12	B 3.3-199	0
B 3.3-158	0	B 3.3-200	0
B 3.3-159	0	B 3.3-201	0
B 3.3-160	0	B 3.3-202	0
B 3.3-161	0	B 3.3-203	0
B 3.3-162	0	B 3.3-204	0
B 3.3-163	0	B 3.3-205	0
B 3.3-164	0	B 3.3-206	0
B 3.3-165	0	B 3.3-207	0
B 3.3-166	0	B 3.3-208	0
B 3.3-167	0	B 3.3-209	0
B 3.3-168	0	B 3.3-210	0
B 3.3-169	0	B 3.3-211	0
B 3.3-170	0	B 3.3-212	0
B 3.3-171	0		
B 3.3-172	0		
B 3.3-173	0		
B 3.3-174	0		
B 3.3-175	0		
B 3.3-176	0		
B 3.3-177	0		
B 3.3-178	0		
B 3.3-179	0		
B 3.3-180	0		
B 3.3-181	0		
B 3.3-182	0		
B 3.3-183	0		
B 3.3-184	0		
B 3.3-185	0		
B 3.3-186	0		
B 3.3-187	0		
B 3.3-188	0		
B 3.3-189	0		
B 3.3-190	0		
B 3.3-191	0		
B 3.3-192	0		
B 3.3-193	0		
B 3.3-194	0		
B 3.3-195	0		
B 3.3-196	0		
B 3.3-197	0		
B 3.3-198	0		

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

2.d. Reactor Building Exhaust Radiation—High (continued)

monitor whose trip outputs are assigned to an isolation channel. Two channels of Reactor Building Exhaust—High Function are required to be OPERABLE to ensure that no single instrument failure can preclude the isolation function.

The Allowable Values are chosen to promptly detect gross failure of the fuel cladding.

These Functions isolate the Group 6 valves.

High Pressure Coolant Injection and Reactor Core Isolation Cooling Systems Isolation

3.a., 3.b., 4.a., 4.b. HPCI and RCIC Steam Line Flow—High and Time Delay Relays

Steam Line Flow—High Functions are provided to detect a break of the RCIC or HPCI steam lines and initiate closure of the steam line isolation valves of the appropriate system. If the steam is allowed to continue flowing out of the break, the reactor will depressurize and the core can uncover. Therefore, the isolations are initiated on high flow to prevent or minimize core damage. The isolation action, along with the scram function of the RPS, ensures that the fuel peak cladding temperature remains below the limits of 10 CFR 50.46. Specific credit for these Functions is not assumed in any UFSAR accident analyses since the bounding analysis is performed for large breaks such as recirculation and MSL breaks. However, these instruments prevent the RCIC or HPCI steam line breaks from becoming bounding.

The HPCI and RCIC Steam Line Flow—High signals are initiated after a short time delay from differential pressure instruments (two for HPCI and two for RCIC) that are connected to the system steam lines. Two channels of both HPCI and RCIC Steam Line Flow—High Functions and the associated Time Delay Relays are available and are required to be OPERABLE to ensure that no single instrument failure can preclude the isolation function. The time delay was

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

3.d., 4.d. HPCI and RCIC Turbine Exhaust Diaphragm Pressure—High

High turbine exhaust diaphragm pressure could indicate a degraded inner rupture disc during system operation, before the redundant outer disc is significantly challenged by thermal/cyclic fatigue. These isolations are for equipment protection and are not assumed in any transient or accident analysis in the UFSAR. These instruments are included in the TS because of the potential for risk due to possible failure of the instruments preventing HPCI and RCIC initiations. Therefore, they meet Criterion 4 of Reference 4.

The HPCI and RCIC Turbine Exhaust Diaphragm Pressure—High signals are initiated from pressure switches (four for HPCI and four for RCIC) that are connected to the area between the rupture diaphragms on each system's turbine exhaust line. Four channels of both HPCI and RCIC Turbine Exhaust Diaphragm Pressure—High Functions are available and are required to be OPERABLE to ensure that no single instrument failure can preclude the isolation function.

The Allowable Values are high enough to prevent isolation of HPCI or RCIC if the associated turbine is operating, yet low enough to detect degradation of the inner rupture disc during operation.

These Functions isolate the Group 4 and 5 valves, as appropriate.

3.e., 4.e. Drywell Pressure—High

High drywell pressure can indicate a break in the RCPB. The HPCI and RCIC isolation of the turbine exhaust is provided to prevent communication with the drywell when high drywell pressure exists. A potential leakage path exists via the turbine exhaust. The isolation is delayed until the system becomes unavailable for injection (i.e., low steam line pressure). The isolation of the HPCI and RCIC turbine exhaust by Drywell Pressure—High is indirectly assumed in the UFSAR accident analysis because the turbine exhaust leakage path is not assumed to contribute to offsite doses.

(continued)

BASES

TO

THE FACILITY OPERATING LICENSE DPR-62

TECHNICAL SPECIFICATIONS

FOR

BRUNSWICK STEAM ELECTRIC PLANT

UNIT 2

CAROLINA POWER & LIGHT COMPANY

REVISION 12

LIST OF EFFECTIVE PAGES - BASES

Page No.	Revision No.	Page No.	Revision No.
Title Page	12	B 3.1-7	0
		B 3.1-8	0
List of Effective Pages - Book 1		B 3.1-9	0
		B 3.1-10	0
LOEP-1	12	B 3.1-11	0
LOEP-2	3	B 3.1-12	0
LOEP-3	12	B 3.1-13	0
LOEP-4	12	B 3.1-14	0
		B 3.1-15	0
i	0	B 3.1-16	0
ii	0	B 3.1-17	0
		B 3.1-18	0
B 2.0-1	0	B 3.1-19	0
B 2.0-2	0	B 3.1-20	0
B 2.0-3	0	B 3.1-21	0
B 2.0-4	0	B 3.1-22	0
B 2.0-5	0	B 3.1-23	0
B 2.0-6	0	B 3.1-24	0
B 2.0-7	0	B 3.1-25	0
B 2.0-8	0	B 3.1-26	0
		B 3.1-27	0
B 3.0-1	0	B 3.1-28	0
B 3.0-2	0	B 3.1-29	0
B 3.0-3	0	B 3.1-30	0
B 3.0-4	0	B 3.1-31	0
B 3.0-5	0	B 3.1-32	0
B 3.0-6	0	B 3.1-33	0
B 3.0-7	0	B 3.1-34	0
B 3.0-8	0	B 3.1-35	0
B 3.0-9	0	B 3.1-36	0
B 3.0-10	0	B 3.1-37	0
B 3.0-11	0	B 3.1-38	0
B 3.0-12	0	B 3.1-39	0
B 3.0-13	0	B 3.1-40	0
B 3.0-14	0	B 3.1-41	0
B 3.0-15	0	B 3.1-42	0
		B 3.1-43	0
B 3.1-1	0	B 3.1-44	0
B 3.1-2	0	B 3.1-45	0
B 3.1-3	0	B 3.1-46	0
B 3.1-4	0	B 3.1-47	0
B 3.1-5	0	B 3.1-48	0
B 3.1-6	0		

(continued)

LIST OF EFFECTIVE PAGES - BASES (continued)

Page No.	Revision No.	Page No.	Revision No.
B 3.3-73	0	B 3.3-115	0
B 3.3-74	0	B 3.3-116	0
B 3.3-75	0	B 3.3-117	0
B 3.3-76	0	B 3.3-118	0
B 3.3-77	3	B 3.3-119	0
B 3.3-78	3	B 3.3-120	0
B 3.3-79	3	B 3.3-121	0
B 3.3-80	3	B 3.3-122	0
B 3.3-81	3	B 3.3-123	0
B 3.3-82	3	B 3.3-124	0
B 3.3-83	3	B 3.3-125	0
B 3.3-84	3	B 3.3-126	0
B 3.3-85	3	B 3.3-127	0
B 3.3-86	0	B 3.3-128	0
B 3.3-87	0	B 3.3-129	0
B 3.3-88	0	B 3.3-130	0
B 3.3-89	0	B 3.3-131	0
B 3.3-90	0	B 3.3-132	0
B 3.3-91	0	B 3.3-133	0
B 3.3-92	0	B 3.3-134	0
B 3.3-93	0	B 3.3-135	0
B 3.3-94	0	B 3.3-136	0
B 3.3-95	0	B 3.3-137	0
B 3.3-96	0	B 3.3-138	0
B 3.3-97	0	B 3.3-139	0
B 3.3-98	0	B 3.3-140	0
B 3.3-99	0	B 3.3-141	0
B 3.3-100	0	B 3.3-142	0
B 3.3-101	0	B 3.3-143	0
B 3.3-102	0	B 3.3-144	0
B 3.3-103	0	B 3.3-145	0
B 3.3-104	0	B 3.3-146	0
B 3.3-105	0	B 3.3-147	0
B 3.3-106	0	B 3.3-148	0
B 3.3-107	0	B 3.3-149	0
B 3.3-108	0	B 3.3-150	0
B 3.3-109	0	B 3.3-151	0
B 3.3-110	0	B 3.3-152	0
B 3.3-111	0	B 3.3-153	0
B 3.3-112	0	B 3.3-154	5
B 3.3-113	0	B 3.3-155	0
B 3.3-114	0	B 3.3-156	12

(continued)

LIST OF EFFECTIVE PAGES - BASES (continued)

Page No.	Revision No.	Page No.	Revision No.
B 3.3-157	12	B 3.3-199	0
B 3.3-158	12	B 3.3-200	0
B 3.3-159	0	B 3.3-201	0
B 3.3-160	0	B 3.3-202	0
B 3.3-161	0	B 3.3-203	0
B 3.3-162	0	B 3.3-204	0
B 3.3-163	0	B 3.3-205	0
B 3.3-164	0	B 3.3-206	0
B 3.3-165	0	B 3.3-207	0
B 3.3-166	0	B 3.3-208	0
B 3.3-167	0	B 3.3-209	0
B 3.3-168	0	B 3.3-210	0
B 3.3-169	0	B 3.3-211	0
B 3.3-170	0	B 3.3-212	0
B 3.3-171	0	B 3.3-213	0
B 3.3-172	0		
B 3.3-173	0		
B 3.3-174	0		
B 3.3-175	0		
B 3.3-176	0		
B 3.3-177	0		
B 3.3-178	0		
B 3.3-179	0		
B 3.3-180	0		
B 3.3-181	0		
B 3.3-182	0		
B 3.3-183	0		
B 3.3-184	0		
B 3.3-185	0		
B 3.3-186	0		
B 3.3-187	0		
B 3.3-188	0		
B 3.3-189	0		
B 3.3-190	0		
B 3.3-191	0		
B 3.3-192	0		
B 3.3-193	0		
B 3.3-194	0		
B 3.3-195	0		
B 3.3-196	0		
B 3.3-197	0		
B 3.3-198	0		

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

High Pressure Coolant Injection and Reactor Core Isolation Cooling Systems Isolation

3.a., 3.b., 4.a., 4.b. HPCI and RCIC Steam Line Flow—High and Time Delay Relays

Steam Line Flow—High Functions are provided to detect a break of the RCIC or HPCI steam lines and initiate closure of the steam line isolation valves of the appropriate system. If the steam is allowed to continue flowing out of the break, the reactor will depressurize and the core can uncover. Therefore, the isolations are initiated on high flow to prevent or minimize core damage. The isolation action, along with the scram function of the RPS, ensures that the fuel peak cladding temperature remains below the limits of 10 CFR 50.46. Specific credit for these Functions is not assumed in any UFSAR accident analyses since the bounding analysis is performed for large breaks such as recirculation and MSL breaks. However, these instruments prevent the RCIC or HPCI steam line breaks from becoming bounding.

The HPCI and RCIC Steam Line Flow—High signals are initiated after a short time delay from differential pressure instruments (two for HPCI and two for RCIC) that are connected to the system steam lines. Two channels of both HPCI and RCIC Steam Line Flow—High Functions and the associated Time Delay Relays are available and are required to be OPERABLE to ensure that no single instrument failure can preclude the isolation function. The time delay was selected to prevent spurious isolation of HPCI and RCIC due to transient high steam flow during turbine starts and spurious operation during HPCI and RCIC operation.

The Allowable Values are chosen to be low enough to ensure that the trip occurs to prevent fuel damage and maintains the MSLB event as the bounding event.

These Functions isolate the Group 4 and 5 valves, as appropriate.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

3.c., 4.c. HPCI and RCIC Steam Supply Line Pressure—Low

The steam line low pressure function is provided so that the steam isolation valves are automatically closed after reactor steam pressure is below that at which HPCI or RCIC can effectively operate. This closure ensures that long term containment leakage rates are within limits after a LOCA.

The HPCI and RCIC Steam Supply Line Pressure—Low signals are initiated from pressure switches (four for HPCI and four for RCIC) that are connected to the system steam line. Four channels of both HPCI and RCIC Steam Supply Line Pressure—Low Functions are available and are required to be OPERABLE to ensure that no single instrument failure can preclude the isolation function.

The Allowable Values are selected to be below the pressure at which the system's turbine can effectively operate. The Allowable Values are also selected to be above the peak expected drywell pressure to ensure that an elevated drywell pressure during a LOCA does not prevent timely closure of the valves.

These Functions isolate the Group 4 and 5 valves, as appropriate.

3.d., 4.d. HPCI and RCIC Turbine Exhaust Diaphragm Pressure—High

High turbine exhaust diaphragm pressure could indicate a degraded inner rupture disc during system operation, before the redundant outer disc is significantly challenged by thermal/cyclic fatigue. These isolations are for equipment protection and are not assumed in any transient or accident analysis in the UFSAR. These instruments are included in the TS because of the potential for risk due to possible failure of the instruments preventing HPCI and RCIC initiations. Therefore, they meet Criterion 4 of Reference 4.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

3.d., 4.d. HPCI and RCIC Turbine Exhaust Diaphragm Pressure—High (continued)

The HPCI and RCIC Turbine Exhaust Diaphragm Pressure—High signals are initiated from pressure switches (four for HPCI and four for RCIC) that are connected to the area between the rupture diaphragms on each system's turbine exhaust line. Four channels of both HPCI and RCIC Turbine Exhaust Diaphragm Pressure—High Functions are available and are required to be OPERABLE to ensure that no single instrument failure can preclude the isolation function.

The Allowable Values are high enough to prevent isolation of HPCI or RCIC if the associated turbine is operating, yet low enough to detect degradation of the inner rupture disc during oepration.

These Functions isolate the Group 4 and 5 valves, as appropriate.

3.e., 4.e. Drywell Pressure—High

High drywell pressure can indicate a break in the RCPB. The HPCI and RCIC isolation of the turbine exhaust is provided to prevent communication with the drywell when high drywell pressure exists. A potential leakage path exists via the turbine exhaust. The isolation is delayed until the system becomes unavailable for injection (i.e., low steam line pressure). The isolation of the HPCI and RCIC turbine exhaust by Drywell Pressure—High is indirectly assumed in the UFSAR accident analysis because the turbine exhaust leakage path is not assumed to contribute to offsite doses.

High drywell pressure signals are initiated from pressure transmitters that sense the pressure in the drywell. Two channels of both HPCI and RCIC Drywell Pressure—High Functions are available and are required to be OPERABLE to ensure that no single instrument failure can preclude the isolation function.

The Allowable Value was selected to be the same as the ECCS Drywell Pressure—High Allowable Value (LCO 3.3.5.1), since this is indicative of a LOCA inside primary containment.

This Function isolates the Group 7 and 9 valves.

(continued)