PACKAGE 3.2

POWER DISTRIBUTION LIMITS

CROSS - REFERENCE

CURRENT TECHNICAL SPECIFICATIONS

TO

IMPROVED TECHNICAL SPECIFICATIONS

List of Section Cross - References

3.10 3.11 Table 3.5-2A

PRAIRIE ISLAND NUCLEAR GENERATING PLANT UNITS 1 AND 2

Improved Technical Specifications Conversion Submittal

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
CTS Section	3.10			
3.10.A.1		LCO	3.1.1	
3.10.A.1			Relocated - COLR	
3.10.A.2		LCO	3.1.1	
3.10.A.3		LCO	3.1.1	
New		SR	3.1.1.1	
New		LCO	3.1.2	
New		SR	3.1.2.1	
3.10.B.1		LCO	3.2.1	
3.10.B.1		LCO	3.2.2	
3.10.B.1		(Partial)	Relocated - COLR	
3.10.B.2		SR	3.2.1.1	
3.10.B.2		SR	3.2.1.2	
3.10.B.2		SR	3.2.2.1	
3.10.B.2		SR	3.2.3.2	
3.10.B.3.a		LCO	3.2.1	
3.10.B.3.a		LCO	3.2.2	
3.10.B.3.a		(Partial)	Relocated - COLR	

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CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
New		LCO	3.2.1	
New		LCO	3.2.2	
3.10.B.3.b		LCO	3.2.1	
3.10.B.3.b		(Partial)	Relocated - COLR	
New		LCO	3.2.1	
3.10.B.3.c		LCO	3.2.2	
3.10.B.3.d		SR	3.2.1.2	
3.10.B.3.d		(Partial)	Relocated - COLR	
3.10.B.4		LCO	3.2.3	
New		LCO	3.2.3	
3.10.B.5		LCO	3.2.3	
3.10.B.6		LCO	3.2.3	
New		LCO	3.2.3	
3.10.B.7		LCO	3.2.3	
3.10.B.8		LCO	3.2.3	
3.10.B.9			Relocated - TRM	
New		SR	3.2.3.1	
3.10.C.1		LCO	3.2.4	

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
New		LCO	3.2.4	
New		SR	3.2.4.1	
3.10.C.2			Deleted	
3.10.C.3			Deleted	
3.10.C.4		SR	3.2.4.2	
3.10.C.4		LCO	3.3.1 D	
3.10.C.4		(Partial)	Relocated - Bases	
3.10.D.1		LCO	3.1.5	
New		LCO	3.1.5	
New		SR	3.1.5.1	
3.10.D.2		LCO	3.1.6	
New		LCO	3.1.6	
New		SR	3.1.6.1	
New		SR	3.1.6.2	
New		SR	3.1.6.3	
3.10.D.3		LCO	3.1.5	
3.10.D.3		LCO	3.1.6	
3.10.D.3		LCO	3.1.8	

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CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
New		LCO	3.1.8	_
New		SR	3.1.8.1	
New		SR	3.1.8.2	
New		SR	3.1.8.3	
New		SR	3.1.8.4	
3.10.E.1		LCO	3.1.4	
3.10.E.2			Deleted	
3.10.F.1		LCO	3.1.7	
3.10.F.1		(Partial)	Relocated - Bases	
3.10.F.2		LCO	3.1.7	
3.10.F.3		LCO	3.1.7	
3.10.F.4		LCO	3.1.7	
3.10.F.5		LCO	3.1.4	
New		LCO	3.1.7	
3.10.G.1			Relocated - Bases	
3.10.G.2		LCO	3.1.4	
3.10.G.3		LCO	3.1.4	
3.10.G.4		LCO	3.1.4	

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CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
3.10.G.5		LCO	3.1.4	
3.10.G.5		(Partial)	Relocated - Bases	
3.10.G.6		LCO	3.1.4	
New		LCO	3.1.4	
3.10.H		SR	3.1.4.3	
3.10.1.1			Relocated - TRM	
3.10.1.2			Relocated - TRM	
3.10.1.3			Relocated - TRM	
3.10.J		LCO	3.4.1	
3.10.J		(Partial)	Relocated - COLR	
3.10.J		SR	3.4.1.1	
3.10.J		SR	3.4.1.2	
3.10.J		SR	3.4.1.3	

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
CTS Section 3	.11		and Maria A Leaperture	
3.11.A			Relocated - TRM	
3.11.B			Relocated - TRM	
3.11.C			Relocated - TRM	
3.11.D			Relocated - TRM	

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
CTS Section Table				
Table 1-1		TABLE	Table 1.1-1	
Table 1-1	Note *	LCO	3.9.1	
New		LCO	3.9.1	
Table 1-1	Note *	(Partial)	Relocated - COLR	
Table 1-1	Note **		Deleted	
Table 3.5-1	9	TABLE	3.3.5-1	Note c
Table 3.5-1	1	TABLE	3.3.2-1	1c
Table 3.5-1	2a	TABLE	3.3.2-1	2c
Table 3.5-1	2b	TABLE	3.3.2-1	4b
Table 3.5-1	3	TABLE	3.3.2-1	1d
Table 3.5-1	4	TABLE	3.3.2-1	1e
Table 3.5-1	4	TABLE	3.3.2-1	Note b
Table 3.5-1	5	TABLE	3.3.2-1	4c
Table 3.5-1	6	TABLE	3.3.2-1	4d
Table 3.5-1	7	SR	3.6.8.1	
Table 3.5-1	8		Relocated - TRM	
Table 3.5-1	9	TABLE	3.3.5-1	3

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
Table 3.5-1	10	SR	3.3.4.2	
Table 3.5-2A	1	TABLE	3.3.1-1	1
Table 3.5-2A	2a	TABLE	3.3.1-1	2a
Table 3.5-2A	2b	TABLE	3.3.1-1	2b
Table 3.5-2A	3	TABLE	3.3.1-1	3a
Table 3.5-2A	4	TABLE	3.3.1-1	3b
Table 3.5-2A	5	TABLE	3.3.1-1	4
Table 3.5-2A	6	TABLE	3.3.1-1	5
Table 3.5-2A	7	TABLE	3.3.1-1	6
Table 3.5-2A	8	TABLE	3.3.1-1	7
Table 3.5-2A	9	TABLE	3.3.1-1	8a
Table 3.5-2A	10	TABLE	3.3.1-1	8b
Table 3.5-2A	11	TABLE	3.3.1-1	9
Table 3.5-2A	12	TABLE	3.3.1-1	10
Table 3.5-2A	13	TABLE	3.3.1-1	14
Table 3.5-2A	14	TABLE	3.3.1-1	13
Table 3.5-2A	15	TABLE	3.3.1-1	12
Table 3.5-2A	16a	TABLE	3.3.1-1	11a
Table 3.5-2A	16b	TABLE	3.3.1-1	11b

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
Table 3.5-2A	17	TABLE	3.3.1-1	15
Table 3.5-2A	18	TABLE	3.3.1-1	19
Table 3.5-2A	19	TABLE	3.3.1-1	17
Table 3.5-2A	20	TABLE	3.3.1-1	17
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Table 3.5-2A	New Func	TABLE	3.3.1-1	18
Table 3.5-2A	Act 1	LCO	3.3.1 B	
Table 3.5-2A	Action 1	LCO	3.3.1 M	
Table 3.5-2A	Action 2	LCO	3.3.1 D	
Table 3.5-2A	Action 2	LCO	3.3.1 E	
Table 3.5-2A	Act 2	SR	3.2.4.2	
Table 3.5-2A	Act 2c	SR	3.2.4.2	
Table 3.5-2A	Act 3	LCO	3.3.1 F	
Table 3.5-2A	New Action	LCO	3.3.1 G	
Table 3.5-2A	Action 4	LCO	3.3.1 H	
Table 3.5-2A	New Action	LCO	3.3.1 I	
Table 3.5-2A	Action 5	LCO	3.3.1 J	
Table 3.5-2A	Action 6	LCO	3.3.1 E	
Table 3.5-2A	Action 6	LCO	3.3.1 K	

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
Table 3.5-2A	Action 6	LCO	3.3.1 N	
Table 3.5-2A	Action 7	LCO	3.3.1 O	
Table 3.5-2A	Act 8	LCO	3.3.1 C	
Table 3.5-2A	Action 9a	LCO	3.3.1 S	
Table 3.5-2A	Action 9a	LCO	3.3.1.P	
Table 3.5-2A	Action 9b	LCO	3.3.1 P	
Table 3.5-2A	Action 10	LCO	3.3.1 C	
Table 3.5-2A	Act 10	LCO	3.3.1 P	
Table 3.5-2A	Action11	LCO	3.3.1 L	
Table 3.5-2A	New Action	LCO	3.3.1 Q	
Table 3.5-2A	New Action	LCO	3.3.1 R	
Table 3.5-2A	New Action	LCO	3.3.1 S	
Table 3.5-2A	Note a	TABLE	3.3.1-1	Note a
Table 3.5-2A	Note b	TABLE	3.3.1-1	Note b
Table 3.5-2A	Note c	TABLE	3.3.1-1	Note d
Table 3.5-2A	Note d	TABLE	3.3.1-1	Note i
Table 3.5-2A	New Note	TABLE	3.3.1-1	Note e
Table 3.5-2A	New Note	TABLE	3.3.1-1	Note f
Table 3.5-2A	New Note	TABLE	3.3.1-1	Note g

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
Table 3.5-2A	New Note	TABLE	3.3.1-1	Note h
Table 3.5-2A	New Note	TABLE	3.3.1-1	Note j
Table 3.5-2B	1a	TABLE	3.3.2-1	1a
Table 3.5-2B	1b	TABLE	3.3.2-1	1c
Table 3.5-2B	1c	TABLE	3.3.2-1	1e
Table 3.5-2B	1d	TABLE	3.3.2-1	1d
Table 3.5-2B	1e	TABLE	3.3.2-1	1b
Table 3.5-2B	2a	TABLE	3.3.2-1	2a
Table 3.5-2B	2b	TABLE	3.3.2-1	2c
Table 3.5-2B	2c	TABLE	3.3.2-1	2b
Table 3.5-2B	3a	TABLE	3.3.2-1	3c
Table 3.5-2B	3b	TABLE	3.3.2-1	3a
Table 3.5-2B	3c	TABLE	3.3.2-1	3b
Table 3.5-2B	4a	TABLE	3.3.5-1	5
Table 3.5-2B	4b	TABLE	3.3.5-1	1
Table 3.5-2B	4c	TABLE	3.3.5-1	6
Table 3.5-2B	4d	TABLE	3.3.5-1	4
Table 3.5-2B	4e	TABLE	3.3.5-1	3
Table 3.5-2B	4f	TABLE	3.3.5-1	2

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CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
Table 3.5-2B	5a	LCO	3.7.2	
Table 3.5-2B	5b	TABLE	3.3.2-1	4b
Table 3.5-2B	5c	TABLE	3.3.2-1	4d
Table 3.5-2B	5d	TABLE	Not used	
Table 3.5-2B	5e	TABLE	3.3.2-1	4a
Table 3.5-2B	6a	TABLE	3.3.2-1	5b
Table 3.5-2B	6b	TABLE	3.3.2-1	5c
Table 3.5-2B	6c		Relocated - TRM	
Table 3.5-2B	6d	TABLE	3.3.2-1	5a
Table 3.5-2B	7a		Relocated - TRM	
Table 3.5-2B	7b	TABLE	3.3.2-1	6b
Table 3.5-2B	7c	TABLE	3.3.2-1	6d
Table 3.5-2B	7c	TABLE	3.3.2-1	Note f
Table 3.5-2B	7d	TABLE	3.3.2-1	6e
Table 3.5-2B	7d*	TABLE	3.3.2-1	Note g
Table 3.5-2B	7e	TABLE	3.3.2-1	6c
Table 3.5-2B	7f	TABLE	3.3.2-1	6a
Table 3.5-2B	8a	LCO	3.3.4.a	

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
Table 3.5-2B	8b	LCO	3.3.4.b	
Table 3.5-2B	9		Deleted - LAR	
Table 3.5-2B	Act 20	LCO	3.3.2 C	
Table 3.5-2B	Act 21	LCO	3.3.2 D	
Table 3.5-2B	Act 21	LCO	3.3.2 E	
Table 3.5-2B	Act 22	LCO	3.3.5 A	
Table 3.5-2B	Act 23	LCO	3.3.2 B	
Table 3.5-2B	Act 24	LCO	3.3.2 D	
Table 3.5-2B	Act 24	LCO	3.3.2 G	
Table 3.5-2B	Act 25	LCO	3.3.2 F	
Table 3.5-2B	Act 26	LCO	3.3.2 I	
Table 3.5-2B	Act 27	LCO	3.7.2	
Table 3.5-2B	Act 28	LCO	3.3.2 F	
Table 3.5-2B	Act 29	LCO	3.3.2 D	
Table 3.5-2B	Act 29	LCO	3.3.2 H	
Table 3.5-2B	Act 30	LCO	3.3.2	
Table 3.5-2B	Act 31	LCO	3.3.4 A	
Table 3.5-2B	Act 32		Deleted	
Table 3.5-2B	Act 33	LCO	3.3.4 B	

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CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
Table 3.5-2B	Act 34		Deleted - LAR	
Table 3.5-2B	New Action	LCO	3.3.4 C	
Table 3.5-2B	New Action	LCO	3.3.4 D	
Table 3.5-2B	Act 35		Deleted - LAR	
Table 3.5-2B	Act 36		Deleted - LAR	
Table 3.5-2B	Note a	TABLE	3.3.2-1	Note a
Table 3.5-2B	Note b	TABLE	3.3.5-1	Note a, b
Table 3.5-2B	Note c	TABLE	3.3.2-1	Note c
Table 3.5-2B	Note c	LCO	3.7.2	
Table 3.5-2B	Note d	TABLE	3.3.2-1	Note c,d
Table 3.5-2B	New Note	TABLE	3.3.2-1	Note e
Table 3.15-1	1	TABLE	3.3.3-1	1
Table 3.15-1	2	TABLE	3.3.3-1	2
Table 3.15-1	3	TABLE	3.3.3-1	3
Table 3.15-1	4	TABLE	3.3.3-1	4
Table 3.15-1	5	TABLE	3.3.3-1	5
Table 3.15-1	6	TABLE	3.3.3-1	6
Table 3.15-1	7	TABLE	3.3.3-1	7
Table 3.15-1	8	TABLE	3.3.3-1	8

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CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
Table 3.15-1	9	TABLE	3.3.3-1	9
Table 3.15-1	10	TABLE	3.3.3-1	10
Table 3.15-1	11	TABLE	3.3.3-1	11
Table 3.15-1	12	TABLE	3.3.3-1	12
Table 3.15-1	13	TABLE	3.3.3-1	13
Table 3.15-1	14	TABLE	3.3.3-1	14
Table 3.15-1	15	TABLE	3.3.3-1	15
Table 3.15-1	16	TABLE	3.3.3-1	16
Table 3.15-1	Action a	LCO	3.3.3	
Table 3.15-1	Action a1	LCO	3.3.3 A	
Table 3.15-1	Action a1	LCO	3.3.3 C	
Table 3.15-1	Action a2	LCO	3.3.3 D	
Table 3.15-1	Action a2	LCO	3.3.3 I	
Table 3.15-1	Action a3	LCO	3.3.3 D	
Table 3.15-1	Action a3	LCO	3.3.3 J	
Table 3.15-1	Action a4	LCO	3.3.3 E	
Table 3.15-1	Action a4	LCO	3.3.3 I	
Table 3.15-1	Action a5	LCO	3.3.3 B	
Table 3.15-1	Action a5	LCO	3.3.3 C	

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
Table 3.15-1	Action a5	LCO	3.3.3	
Table 3.15-1	Action a6	LCO	3.3.3 F	
Table 3.15-1	Action a6	LCO	3.3.3 G	
Table 3.15-1	Action a6	LCO	3.3.3 I	
Table 3.15-1	New Cond	LCO	3.3.3 H	
Table 3.15-1	Action b	TABLE	3.3.3-1	Note a
Table 3.15-1	Action c	TABLE	3.3.3-1	Note b
Table 3.15-1	New Note	TABLE	3.3.3-1	Note c
Table 4.1-1A	1	TABLE	3.3.1-1	1
Table 4.1-1A	2a	TABLE	3.3.1-1	2a
Table 4.1-1A	2a	TABLE	3.3.1-1	6
Table 4.1-1A	2a	TABLE	3.3.1-1	7
Table 4.1-1A	2b	TABLE	3.3.1-1	2b
Table 4.1-1A	3	TABLE	3.3.1-1	3a
Table 4.1-1A	4	TABLE	3.3.1-1	3b
Table 4.1-1A	5	TABLE	3.3.1-1	4
Table 4.1-1A	6	TABLE	3.3.1-1	5
Table 4.1-1A	7	TABLE	3.3.1-1	6
Table 4.1-1A	8	TABLE	3.3.1-1	7

CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
Table 4.1-1A	9	TABLE	3.3.1-1	8a
Table 4.1-1A	10	TABLE	3.3.1-1	8b
Table 4.1-1A	11	TABLE	3.3.1-1	9
Table 4.1-1A	12	TABLE	3.3.1-1	10
Table 4.1-1A	13	TABLE	3.3.1-1	14
Table 4.1-1A	14	TABLE	3.3.1-1	13
Table 4.1-1A	15	TABLE	3.3.1-1	12
Table 4.1-1A	16a	TABLE	3.3.1-1	11a
Table 4.1-1A	16b	TABLE	3.3.1-1	11b
Table 4.1-1A	17	TABLE	3.3.1-1	15
Table 4.1-1A	18	TABLE	3.3.1-1	19
Table 4.1-1A	19	TABLE	3.3.1-1	17
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Table 4.1-1A	Note 1	TABLE	3.3.1-1	Note a
Table 4.1-1A	Note 2	TABLE	3.3.1-1	Note d
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Table 4.1-1A	Note 4	SR	3.3.1.8	

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Table 4.1-1C	27		Relocated - TRM	
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CTS Section	CTS Table Item Number	Section Type	ITS Section	ITS Table Item Number
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PACAKGE 3.2

POWER DISTRIBUTION LIMITS

CROSS - REFERENCE

IMPROVED TECHNICAL SPECIFICATIONS

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CURRENT TECHNICAL SPECIFICATIONS

Section Cross - Reference

Section 3.2

PRAIRIE ISLAND NUCLEAR GENERATING PLANT UNITS 1 AND 2

Improved Technical Specifications Conversion Submittal

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ITS Section 3	2			
3.2.1		LCO	3.10.B.1	
3.2.1		LCO	3.10.B.3.a	
3.2.1		LCO	New	
3.2.1		LCO	3.10.B.3.b	
3.2.1		LCO	New	
3.2.1.1		SR	3.10.B.2	
3.2.1.2		SR	3.10.B.2	
3.2.1.2		SR	3.10.B.3.d	
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3.2.2		LCO	3.10.B.3.c	
3.2.2		LCO	New	
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3.2.3		LCO	3.10.B.4	
3.2.3		LCO	New	
3.2.3		LCO	3.10.B.5	
3.2.3		LCO	3.10.B.6	

Improved Technical Specification Cross-Reference

Prairie Island Units 1 and 2

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ITS Section	ITS Table Item Number	Section Type	CTS Section	CTS Table Item Number
3.2.3		LCO	New	
3.2.3		LCO	3.10.B.7	
3.2.3		LCO	3.10.B.8	
3.2.3.1		SR	New	
3.2.3.2		SR	3.10.B.2	
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Improved Technical Specification Cross-Reference

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9.	Cross-Reference ITS to CTS			

PACKAGE 3.3

INSTRUMENTATION

PART A

INTRODUCTION

PRAIRIE ISLAND NUCLEAR GENERATING PLANT UNITS 1 AND 2

Improved Technical Specifications Conversion Submittal

LICENSE AMENDMENT REQUEST DATED December 11, 2000 Conversion to Improved Standard Technical Specifications

3.3 PART A

Introduction to the Discussion of the proposed Changes to the Current Technical Specifications, Justification of Differences from the Improved Standard Technical Specifications, and the supporting No Significant Hazards Determination

Pursuant to 10 CFR Part 50, Sections 50.59 and 50.90, the holders of Operating Licenses DPR-42 and DPR-60 hereby propose changes to the Facility Operating Licenses and Appendix A, Technical Specifications, as follows and as presented in the accompanying Parts B through G of this Package.

BACKGROUND

Over the past several years the nuclear industry and the Nuclear Regulatory Commission (NRC) have jointly developed Improved Standard Technical Specifications (ISTS). The NRC has encouraged licensees to implement these improved technical specifications as a means for improving plant safety through the more operator-oriented technical specifications, improved and expanded bases, reduced action statement induced plant transients, and more efficient use of NRC and industry resources.

This License Amendment Request (LAR) is submitted to conform the Prairie Island Nuclear Generating Plant (PINGP) Current Technical Specifications (CTS) to NUREG-1431, Improved Standard Technical Specifications, Westinghouse plants, Revision 1 issued April 1995 (ISTS). The resulting new Technical Specifications (TS) for Prairie Island (PI) are the PI Improved Technical Specifications (ITS) which incorporates the PI plant specific information.

NUREG-1431 is based on a hypothetical four loop Westinghouse plant. Since PI is similar in design and vintage to the R.E. Ginna Nuclear Power Plant which has already completed conversion to improved technical specifications, this amendment request relies on the Ginna ITS.

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Prairie Island Units 1 and 2

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Part A

This LAR is also supported by Parts B through G. Part B contains a "clean" copy of the proposed PI ITS and Bases. Part C contains a mark-up of the PI CTS. Part D is the Description of Changes (DOC) to the PI CTS. Part E is a mark-up of the ISTS and Bases which shows the deviations from the standard incorporated to meet PI plant specific requirements. Part F gives the Justification for Deviations (JFD) from the ISTS and Part G provides the No Significant Hazards Determinations (NSHD) for changes to the PI CTS. To facilitate review of this LAR, cross-reference numbers from changes and deviations to the corresponding DOC, JFD and NSHD are provided. The methodology for mark-up and cross-references are described in the next section.

MARK-UP METHODOLOGY

The TS conversion package includes mark-ups of the CTS, the ISTS and the ISTS Bases in accordance with this guidance. Mark-up may be electronic or by hand as indicated.

Current Technical Specifications

The mark-up of the CTS is provided to show where current requirements are placed in the ITS, to show the major changes resulting from the conversion process, and to allow reviewers to evaluate significant differences between the CTS and ITS.

This ITS conversion LAR has been prepared in 14 packages following the Chapter/Section outline of the ITS as follows: 1.0, 2.0, 3.0, 3.1 . . . 3.9, 4.0 and 5.0. Accordingly, each package contains all the elements of Parts A through G as described above. The CTS Bases are not included in the CTS mark-up packages since the Bases have been rewritten in their entirety.

The current Specifications addressed by the associated ITS Chapter/Section are crossreferenced in the left margin to the new ITS location by Specification number and type (G-General, SL-Safety Limit, LCO-Limiting Condition for Operation or SR-Surveillance Requirements). Those portions of each CTS page which are not addressed in the associated ITS Chapter/Section are shadowed (electronic) or clouded and crossed out (by hand) and in the right margin is the comment, "Addressed Elsewhere".

The CTS are marked-up to incorporate the substance of NUREG-1431 Revision 1. It is not the intent to mark every nuance required to make the format change from CTS to ITS.

Prairie Island Units 1 and 2

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Part A

In general, only technical changes have been identified. However, some non-technical changes have also been included when the changes cannot easily be determined to be non-technical by a reviewer, or if an explanation is required to demonstrate that the change is non-technical.

Some apparent changes result from the different conventions and philosophies used in the ITS. Generally these apparent changes will not be marked-up in the CTS if there is no resulting change in plant operating requirements.

Changes are identified by a change number in the right margin which map the changed specification requirement to Part D, Discussion of Changes, and Part G, No Significant Hazards Determination (NSHD) and indicate the NSHD category. The change number form is R3.4-02 where the first two numbers, 3.4 in this example, refer to ITS Chapter/Section number 3.4, and the second number, 02 in this example, is a sequentially assigned number for changes within that Chapter/Section, starting with 01. The prefix letter(s) indicates the classification of the change impact. For CTS changes this is also the NSHD category.

The change impact categories defined below conveniently group the type of changes for consideration of the effect of the change on the current plant license in Part D and are also useful for efficient discussion in Part G the "No Significant Hazards Determination" (NSHD) section. If the same change is made in Part E, then the change impact category will also show up in the change number in Part F. These categories are:

- A Administrative changes, editorial in nature that do not involve technical issues.
 These include reformatting, renaming (terminology changes), renumbering, and rewording of requirements.
- L Less restrictive requirements included in the PI ITS in order to conform to the guidance of NUREG-1431. Generally these are technical changes to existing TS which may include items such as extending Completion Times or reducing Surveillance Frequencies (extended time interval between surveillances). The less restrictive requirements necessitate individual justification. Each is provided with its specific NSHD.
- LR Less restrictive Removal of details and information from otherwise retained specifications which are removed from the CTS and placed in the Bases, Technical Requirements Manual (TRM), Updated Safety Analysis Report (USAR) or other licensee controlled documents. These changes include details of system design and function, procedural details or methods of conducting surveillances, or alarm or indication-only instrumentation.

Prairie Island Units 1 and 2

Part A

- M More restrictive requirements included in the PI ITS in order to provide a complete set of Specifications conforming to the guidance of NUREG-1431. Changes in this category may be completely new requirements or they may be technical changes made to current requirements in the CTS.
- R Relocation of Current Specifications to other controlled documents or deletion of current Specifications which duplicate existing regulatory requirements.

Current requirements in the LCOs or SRs that do not meet the 10 CFR 50.36 selection criteria and may be relocated to the Bases, USAR, Core Operating Limits Report (COLR), Operational Quality Assurance Plan (OQAP), plant procedures or other licensee controlled documents. Relocating requirements to these licensee controlled documents does not eliminate the requirement, but rather, places them under more appropriate regulatory controls, such as 10CFR 50.54 (a)(3) and 10 CFR 50.59, to manage their implementation and future changes. Maintenance of these requirements in the TS commands resources which are not commensurate with their importance to safety and distract resources from more important requirements. Relocation of these items will enable more efficient maintenance of requirements under existing regulations and reduce the need to request TS changes for issues which do not affect public safety.

Deletion of Specifications which duplicate regulations eliminates the need to change Technical Specifications when changes in regulations occur. By law, licensees shall meet applicable requirements contained in the Code of Federal Regulations, or have NRC approved exemptions; therefore, restatement in the Technical Specifications is unnecessary.

The methodology for marking-up these changes is as follows:

As discussed above, administrative changes may not be marked-up in detail. Portions of the specifications which are no longer included are identified by use of the electronic strike-out feature (or crossed out by hand). Information being added is inserted into the specification in the appropriate location and is identified by use of shading features (or handwritten/insert pages).

Prairie Island Units 1 and 2

Improved Standard Technical Specifications (NUREG-1431, Rev. 1)

The ISTS mark-up is to identify changes from the ISTS required to create a plant specific ITS by incorporating plant specific values in bracketed fields and identifying other changes with cross-reference to the Part F Justification For Differences.

All deviations from the ISTS are cross-referenced to the Part F justification for differences by a change number in the right margin. The change number form is CL3.4-05 where the prefix letter(s), CL in this example, indicate the classification of the reason for the difference, the first two numbers, 3.4 in this example, refer to the ITS Chapter/Section number 3.4, and the second number, 05 in this example, is a sequentially assigned number for deviations within that Chapter/Section, starting with a number which is larger than the last number from the Part C CTS mark-up. In some instances where a change has been made to the CTS and ISTS, the Part D change number is given since the justification for difference is the same as the discussion of change. The following categories are used as prefixes to indicate the general reason for each difference:

- CL Current Licensing basis. Issues that have been previously licensed for PI and have been retained in the ITS. This includes Specifications dictated by plant design features or the design basis. Since no plant modifications have been or will be made to accommodate conversion to ITS, the plant design basis features shall be incorporated into the PI ITS.
- PA Plant, Administrative. Plant specific wording preference or minor editorial improvements made to facilitate operator understanding.
- TA Traveler, Approved. Deviations made to incorporate an industry traveler which has been approved by the NRC.
- TP Traveler, Proposed. Deviation made to incorporate a proposed industry traveler which as of the time of submittal has not been approved by the NRC.
- X Other, Deviation from the ISTS for any other reason than those given above.

Material which is deleted from the ISTS is identified by use of the WordPerfect strikeout feature (or crossed out by hand). Information being added to the ISTS to generate the PI ITS due to any of the deviations discussed above is identified by use of WordPerfect red-line features (or handwritten/insert pages).

Prairie Island Units 1 and 2

Bracketed Information

Many parameters, conditions, notes, surveillances, and portions of sections are bracketed in the ISTS recognizing that plant specific values are likely to vary from the "generic" values provided in the standard.

If the bracketed value applies to PI, then the "generic" information is retained without any special indication and the brackets are marked using the WordPerfect strike-out feature. In some instances, bracketed material is not discussed. If bracketed material is discussed, a change number is provided which includes the appropriate prefix as described above. When bracketed "generic" material is not incorporated, the bracketed material and brackets are marked with the WordPerfect strike-out feature (or crossed out by hand), the plant specific information is substituted for the bracketed information and a change number is provided which includes the appropriate prefix. Information added is indicated by the WordPerfect red-line (shading) feature (or handwritten/insert pages).

Optional Sections

Due to differing Westinghouse plant designs and methodologies, some ISTS section numbers include a letter suffix indicating that only one of these sections is applicable to any specific plant. The appropriate section is indicated in the Table of Contents, the suffix letter is deleted, and justification, if required, is included in the appropriate Chapter/Section package.

Bases, Improved Standard Technical Specifications (NUREG-1431, Rev. 1)

The ISTS Bases have been marked-up to support the plant specific PI ITS and allow reviewers to identify changes from NUREG-1431. To the extent possible, the words of NUREG-1431, Rev. 1 are retained to maximize standardization. Where the existing words in the NUREG are incorrect or misleading with respect to Prairie Island, they have been revised. In addition, descriptions have been added to cover plant specific portions of the specifications. Change numbers have been provided for the ISTS Bases with the same format as the ISTS Specification mark-up. In some instances, the same change number is used to describe the change.

Material which is deleted from the ISTS Bases is identified by use of the strike-out feature of WordPerfect (or crossed out by hand). Information being added to the ISTS Bases to generate the PI ITS is identified by use of the red-line (shading) feature of WordPerfect (or handwritten/insert pages).

Prairie Island Units 1 and 2

Part A

Bracketed Material

Many parameters and portions of Bases are bracketed in the ISTS recognizing that plant specific values and discussions are likely to vary from the "generic" information provided in the standard.

If the bracketed information applies to PI, then the "generic" information is retained without any special indication and the brackets are marked using the WordPerfect strike-out feature. No change number or justification is provided for use of bracketed material, unless special circumstances warrant discussion.

When bracketed "generic" Bases material is not incorporated, the bracketed material and brackets are marked with the WordPerfect strike-out feature (or crossed out by hand) and the plant specific information substituted for the bracketed information is indicated by the WordPerfect red-line (shading) feature (or handwritten/insert pages). A change number with the same format as those used for the ISTS Specification mark-up is provided.

ACRONYMS

Many acronyms are used throughout this submittal. The intent of the final ITS (Part B) is that in general acronyms be written in full prior to the first use. Commonly used acronyms may not be written in full. Other parts of this package may not always write in full each acronym prior to first use; therefore, a list of acronyms is attached to assist in the review of this package.

Prairie Island Units 1 and 2

Attachment to Part A

LIST OF ACRONYMS

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AB	Auxiliary Building
ABSVS	Auxiliary Building Special Ventilation System
AFD	Axial Flux Difference
AFW	Auxiliary Feedwater System
ALARA	As Low As Reasonably Achievable
ALT	Actuation Logic Test
ASA	Applicable Safety Analyses
ASME	American Society of Mechanical Engineers
AOO	Anticipated Operational Occurrences
AOT	Allowed Outage Time
BAST	Boric Acid Storage Tank
BIT	Boron Injection Tank
BOC	Beginning of Cycle
CC	Component Cooling
COT	CHANNEL OPERATIONAL TEST
CAOC	Constant Axial Offset Control
CET	Core Exit Thermocouple
CL	Cooling Water
CLB	Current Licensing Basis
COLR	Core Operating Limits Reports
CRDM	Control Rod Drive Mechanism
CRSVS	Control Room Special Ventilation System
CS	Containment Spray
CST	Condensate Storage Tanks
CTS	Current Technical Specification(s)
DBA	Design Basis Accident
DDCL	Diesel Driven Cooling Water
DG	Diesel Generator
DNB	Departure from Nucleate Boiling
DNBR	Departure from nucleate boiling ratio
ECCS	Emergency Core Cooling System

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EDG EFPD EOC ESF ESFAS FWLB GDC GITS HELB HZP IPE ISTS ITC ITS LA LAR LBLOCA LCO LHR LDCA LCO LHR LOCA LTOP MFIV MFRV MFRV MFRV MSIV MSIV MSLB	Emergency Diesel Generators Effective Full Power Days End of Cycle Engineered Safety Feature Engineered Safety Features Actuation System Feedwater Line Break General Design Criteria Ginna Improved Technical Specifications High Energy Line Break Hot Zero Power Individual Plant Evaluation Improved Standard Technical Specifications Isothermal Temperature Coefficient Improved Technical Specifications License Amendment License Amendment Request Large Break LOCA Limiting Conditions for Operation Linear Heat Rate Loss of Coolant Accident Low Temperature Overpressure Protection Main Feedwater Isolation Valve Main Feedwater MODE or Other Specified Condition of Applicability Motor Operated Valve Main Steam Isolation Valves Main Steam Line Break
MOV	Motor Operated Valve
MSIV	Main Steam Isolation Valves
MSLB	Main Steam Line Break
MSLI	Main Steam Line Isolation
MSSV	Main Steam Safety Valves
MTC	Moderator Temperature Coefficient
NIS	Nuclear Instrumentation System
NMC	Nuclear Management Company
NPSH	Net Positive Suction Head

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Attachment to Part A Page 3 of 4

NRCV Non-Return Check Valve The ISTS for Westinghouse plants NUREG-1431 **OverPressure Protection System OPPS** PCT Peak Cladding Temperature PI Prairie Island PITS **Prairie Island Technical Specifications** PIV **Pressure Isolation Valve** PORV Power Operated Relief Valve PRA **Probabilistic Risk Assessment PSV** Pressurizer Safety Valve PTLR Pressure and Temperature Limits Report **QTPR Quadrant Power Tilt Ratio Rod Cluster Control Assembly** RCCA RCP Reactor Coolant Pump **RCPB Reactor Coolant Pressure Boundary** RCS Reactor Coolant System RHR **Residual Heat Removal System RPI** Rod Position Indication **RPS Reactor Protection System** RTB **Reactor Trip Breaker Reactor Trip Bypass Breaker** RTBB RTP **Rated Thermal Power** RTS **Reactor Trip System Refueling Water Storage Tank** RWST SBLOCA Small Break Loss of Coolant Accident **SBVS** Shield Building Ventilation System Safeguards Chilled Water System SCWS Shut Down Margin SDM Safety Function Determination Program SFDP **Spent Fuel Pool** SFP SG Steam Generator SGTR Steam Generator Tube Rupture SI Safety Injection SL Safety Limit

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SLB SR	Steam Line Break Surveillance Requirements
SSC	Structures, Systems and Components
TADOT	Trip Actuating Device Operational Test
TDAFW	Turbine Driven Auxiliary Feedwater
TRM	Technical Requirements Manual
TS	Technical Specifications
TSSC	Technical Specification Selection Criteria
TSTF	Term used for a NUREG change (traveler)
VCT	Volume Control Tank
VFTP	Ventilation Filter Test Program
UHS	Ultimate Heat Sink
USAR	Updated Safety Analysis Report
WCAP	Westinghouse technical report

PACKAGE 3.3

INSTRUMENTATION

PART B

PROPOSED PRAIRIE ISLAND IMPROVED TECHNICAL SPECIFICATIONS AND BASES

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PRAIRIE ISLAND NUCLEAR GENERATING PLANT UNITS 1 AND 2

Improved Technical Specifications Conversion Submittal

3.3 INSTRUMENTATION

- 3.3.1 Reactor Trip System (RTS) Instrumentation
- LCO 3.3.1 The RTS instrumentation for each Function in Table 3.3.1-1 shall be OPERABLE.

APPLICABILITY: According to Table 3.3.1-1.

ACTIONS

	CONDITION	REQUIRED ACTION	COMPLETION TIME
A.	One or more Functions with one or more required channels or trains inoperable.	A.1 Enter the Condition referenced in Table 3.3.1-1 for the channel(s) or train(s)	Immediately
В.	One Manual Reactor Trip channel inoperable.	 B.1 Restore channel to OPERABLE status. <u>OR</u> 	48 hours
	· · · · ·	B.2 Be in MODE 3.	54 hours

	CONDITION	REQUIRED ACTION	COMPLETION TIME
C.	One channel or train inoperable.	C.1 Restore channel or train to OPERABLE status.	48 hours
		OR	
		C.2.1 Initiate action to fully insert all rods.	48 hours
		AND	
		C.2.2 Place the Rod Control System in a condition incapable of rod withdrawal.	49 hours
D.	One Power Range Neutron Flux - High channel inoperable.	 NOTES 1. The inoperable channel may be bypassed for up to 4 hours for surveillance testing and setpoint adjustment of other channels. 	
		2. An additional power range instrumentation channel may be made inoperable for low power PHYSICS TESTS.	
		D 1 1 Place channel in trip	6 hours
		D.1.1 Place channel in trip.	U HOUIS
		AND	

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. (continued)	D.1.2NOTE Only required to be performed when THERMAL POWER is > 85% RTP and the power Range Neutron Flux input to QPTR is inoperable.	
	Perform SR 3.2.4.2. <u>OR</u>	Once per 12 hours
	D.2 Be in MODE 3.	12 hours
E. One channel inoperable.	 The inoperable channel may be bypassed for up to 4 hours for surveillance testing of other channels. 	
	2. An additional power range instrumentation channel may be made inoperable for low power PHYSICS TESTS.	
·•	E.1 Place channel in trip.	6 hours
	OR E.2 Be in MODE 3.	12 hours

Prairie Island Units 1 and 2

	CONDITION		REQUIRED ACTION	COMPLETION TIME
F.	One Intermediate Range Neutron Flux channel inoperable.	F.1 <u>OR</u> F.2	Reduce THERMAL POWER to < P-6. Increase THERMAL POWER to > P-10.	24 hours 24 hours
G.	Two Intermediate Range Neutron Flux channels inoperable.	G.1	NOTE Limited plant cooldown or boron dilution is allowed provided the change is accounted for in the calculated SDM.	
			Suspend operations involving positive reactivity additions.	Immediately
		<u>AND</u> G.2	Reduce THERMAL POWER to < P-6.	2 hours

	CONDITION		REQUIRED ACTION	COMPLETION TIME
H.	One Source Range Neutron Flux channel inoperable.	H.1	NOTE Limited plant cooldown or boron dilution is allowed provided the change is accounted for in the calculated SDM.	
			Suspend operations involving positive reactivity additions.	Immediately
I.	Two Source Range Neutron Flux channels inoperable.	I.1	Open Reactor Trip Breakers (RTBs).	Immediately
J.	One Source Range Neutron Flux channel inoperable.	J.1 <u>OR</u>	Restore channel to OPERABLE status.	48 hours
			Initiate action to fully insert all rods. ND	48 hours
	· · · · ·		Place the Rod Control System in a condition incapable of rod withdrawal.	49 hours

•	CONDITION	REQUIRED ACTION	COMPLETION TIME
K.	One channel inoperable.	NOTE The inoperable channel may be bypassed for up to 4 hours for surveillance testing of other channels.	
		K.1 Place channel in trip.	6 hours
		K.2 Reduce THERMAL POWER to < P-7 and P-8.	12 hours
L.	One or both channel(s) inoperable on one bus.	NOTE One inoperable channel may be bypassed for up to 4 hours for surveillance testing of other channels.	·
		L.1 Place channel(s) in trip.	6 hours
	· · · · · · · · · · · · · · · · · · ·	L.2 Reduce THERMAL POWER to < P-7 and P-8.	12 hours

	CONDITION	REQUIRED ACTION	COMPLETION TIME
М.	One Reactor Coolant Pump Breaker Position channel inoperable.	M.1 Restore channel to OPERABLE status.	48 hours
		M.2 Reduce THERMAL POWER to < P-7 and P-8.	54 hours
		NOTE The inoperable channel may be bypassed for up to 4 hours for surveillance testing of other channel(s).	
		N.1 Place channel in trip.	6 hours
		N.2 Reduce THERMAL POWER to < P-9.	12 hours

Prairie Island Units 1 and 2

3.3.1-7

CONDITION	REQUIRED ACTION	COMPLETION TIME
O. One train inoperable.	NOTE One train may be bypassed for up to 8 hours for surveillance testing provided the other train is OPERABLE.	
	 O.1 Restore train to OPERABLE status. OR 	6 hours
	O.2 Be in MODE 3.	12 hours
P. One RTB train inoperable.	 One train may be bypassed for up to 4 hours for surveillance testing, provided the other train is OPERABLE. 	
	2. One RTB may be bypassed for up to 4 hours for maintenance on undervoltage or shunt trip mechanisms, provided the other train is OPERABLE.	
	P.1 Restore RTB to OPERABLE status.	1 hour
	OR	
	P.2 Be in MODE 3.	7 hours

Prairie Island Units 1 and 2

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Q.	One or more channels inoperable.		Verify interlock is in required state for existing unit conditions.	1 hour
		OR		
		Q.2	Be in MODE 3.	7 hours
R.	One or more channels inoperable.	R.1	Verify interlock is in required state for existing unit conditions.	1 hour
		OR		
		R.2	Be in MODE 2.	7 hours
S.	One trip mechanism inoperable for one RTB.	S.1	Restore inoperable trip mechanism to OPERABLE status.	48 hours
		OR		
		S.2	Be in MODE 3.	54 hours

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.3.1.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.1.2	 Adjust NIS channel if absolute difference is > 2%. Not required to be performed until 12 hours after THERMAL POWER is ≥ 15% RTP. 	
	Compare results of calorimetric heat balance calculation to Nuclear Instrumentation System (NIS) channel output.	24 hours

SURVEILLANCE REQUIREMENTS (continued)

	SURVEILLANCE	FREQUENCY
SR 3.3.1.3	 Adjust NIS channel if absolute difference is ≥ 3%. Only required to be performed with THERMAL POWER ≥ 15% RTP. 	·
	Compare results of the incore detector measurements to NIS AFD.	Prior to exceeding 75% RTP after each refueling
		AND 31 effective full power days (EFPD)
SR 3.3.1.4	 This Surveillance must be performed on the reactor trip bypass breaker when placing the bypass breaker in service. Verification of setpoints not required. 	
	Perform TADOT.	31 days on a STAGGERED TEST BASIS
SR 3.3.1.5	Perform ACTUATION LOGIC TEST.	31 days on a STAGGERED TEST BASIS

Prairie Island Units 1 and 2

3.3.1-11

SURVEILLANCE REQUIREMENTS (continued)

	SURVEILLANCE	FREQUENCY	
SR 3.3.1.6	NOTENOTENOTENOTENOTENOTENOTE		
	Calibrate excore channels to agree with incore detector measurements.	92 EFPD	
SR 3.3.1.7	Perform COT.	92 days	
SR 3.3.1.8	NOTE This Surveillance shall include verification that interlocks P-6 and P-10 are in their required state for existing unit conditions.		
	Perform COT.	NOTE Only required when not performed withir previous 92 days	
		Prior to reactor startup	
		AND	
		Every 92 days when the unit is in MODES 3, 4 and 5	

Prairie Island Units 1 and 2

3.3.1-12

	SURVEILLANCE	FREQUENCY
SR 3.3.1.9	NOTENOTENOTENOTE	
	Perform TADOT.	92 days
SR 3.3.1.10	NOTE This Surveillance shall include verification that the time constants are adjusted to the prescribed values.	
	Perform CHANNEL CALIBRATION.	24 months
SR 3.3.1.11	 NOTENOTE Neutron detectors are excluded from CHANNEL CALIBRATION. This Surveillance shall include verification that the time constants are adjusted to the prescribed values. 	
	Perform CHANNEL CALIBRATION.	24 months

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE REQUIREMENTS (continued)

	SURVEILLANCE	FREQUENCY
SR 3.3.1.12	 This Surveillance shall include verification of Reactor Coolant System resistance temperature detector bypass loop flow rate. 	
	2. This Surveillance shall include verification that the time constants are adjusted to the prescribed values.	
	Perform CHANNEL CALIBRATION.	24 months
SR 3.3.1.13	Perform COT.	24 months
SR 3.3.1.14	NOTE Verification of setpoint is not required.	
	Perform TADOT.	24 months
SR 3.3.1.15	NOTE Verification of setpoint is not required.	
	Perform TADOT.	Prior to exceeding the P-9 interlock whenever the unit has been shutdown in excess of 2 days if not performed within the previous 31 day.

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
SR 3.3.1.16 Verify RTS RESPONSE TIME is within limits.	24 months on a STAGGERED TEST BASIS

	FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1.	Manual Reactor Trip	1,2	2	. B	SR 3.3.1.14	NA
	mp	3(a), 4(a), 5(a)	2	С	SR 3.3.1.14	NA
•	Power Range Neutron Flux					
	a. High	1,2	4	D	SR 3.3.1.1 SR 3.3.1.2 SR 3.3.1.7	≤ 110% RTP
					SR 3.3.1.11 SR 3.3.1.16	
	b. Low	1 ^(b) ,2	4	E	SR 3.3.1.1 SR 3.3.1.8 SR 3.3.1.11 SR 3.3.1.16	≤ 40% RTP
•	Power Range Neutron Flux Rate					
	a. High Positive Rate	1, 2	4	Е	SR 3.3.1.7 SR 3.3.1.11 SR 3.3.1.16	≤ 6% RTP with time constant ≥ 2 sec
	b. High Negative Rate	1,2	4	E	SR 3.3.1.7 SR 3.3.1.11 SR 3.3.1.16	≤ 8% RTP with time constant ≥ 2 sec
-	Intermediate Range Neutron Flux	1 ^(b) , 2 ^(c)	2	F, G	SR 3.3.1.1 SR 3.3.1.8 SR 3.3.1.11	≤ 40% RTP

Table 3.3.1-1 (page 1 of 8) Reactor Trip System Instrumentation

(a) With Rod Control System capable of rod withdrawal or one or more rods not fully inserted.

(b) Below the P-10 (Power Range Neutron Flux) interlocks.

(c) Above the P-6 (Intermediate Range Neutron Flux) interlocks.

Prairie Island Units 1 and 2

3.3.1-16

Table 3.3.1-1 (page 2 of 8) Reactor Trip System Instrumentation APPLICABLE MODES OR OTHER SPECIFIED REQUIRED ALLOWABLE SURVEILLANCE **FUNCTION** CONDITIONS **CHANNELS** CONDITIONS REQUIREMENTS VALUE 2(d) 2 Source Range H, I SR 3.3.1.1 ≤ 1.0E6 cps Neutron Flux SR 3.3.1.8 SR 3.3.1.11 SR 3.3.1.16 3(a) 4(a) 5(a) 2 I, J SR 3.3.1.1 ≤ 1.0E6 cps SR 3.3.1.8 SR 3.3.1.11 SR 3.3.1.16 6. Overtemperature ΔT 1,2 Ε SR 3.3.1.1 Refer to Note 1 4 SR 3.3.1.3 (Page 3.3.1-22)

SR 3.3.1.6 SR 3.3.1.7 SR 3.3.1.12 SR 3.3.1.16 7. Overpower ΔT 1,2 4 Ε SR 3.3.1.1 Refer to Note 2 SR 3.3.1.3 (Page 3.3.1-23) SR 3.3.1.6 SR 3.3.1.7 SR 3.3.1.12 SR 3.3.1.16 8. Pressurizer Pressure 1(e) ĸ SR 3.3.1.1 ≥ 1760 psig a. Low Δ SR 3.3.1.7 SR 3.3.1.10 b. High Ε SR 3.3.1.1 1,2 3 ≤ 2400 psig SR 3.3.1.7 SR 3.3.1.10

(a) With Rod Control System capable of rod withdrawal or one or more rods not fully inserted.

Below the P-6 (Intermediate Range Neutron Flux) interlocks. (d)

Above the P-7 (Low Power Reactor Trips Block) interlock. (e)

Prairie Island Units 1 and 2

5.

3.3.1-17

	FUNCTION	OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
9.	Pressurizer Water Level - High](e)	3	К	SR 3.3.1.1 SR 3.3.1.7 SR 3.3.1.10	≤ 90%
10.	Reactor Coolant Flow- Low	1(f)	3 per loop	К	SR 3.3.1.1 SR 3.3.1.7 SR 3.3.1.10	≥ 91%
11.	Loss of Reactor Coolant Pump (RCP)		· .			
	a. RCP Breaker Open	1(f)	1 per RCP	М	SR 3.3.1.14	NA
	b. Under- frequency Buses 11 and 12 (21 and 22) ^(g)	1(f)	2 per bus	L	SR 3.3.1.9 SR 3.3.1.10	≥ 58.2 Hz
12.	Undervoltage on Buses 11 and 12 (21 and 22)](e)	2 per bus	L	SR 3.3.1.9 SR 3.3.1.10	≥ 76% bus voltage
13.	Steam Generator (SG) Water Level - Low Low	1, 2	3 per SG	E	SR 3.3.1.1 SR 3.3.1.7 SR 3.3.1.10	≥ 5%

Table 3.3.1-1 (page 3 of 8) Reactor Trip System Instrumentation

(e) Above the P-7 (Low Power Reactor Trips Block) interlock.

(f) Above the P-8 (Power Range Neutron Flux) or P-7 (Low Power Reactor Trips Block) interlocks.

(g) Not a direct reactor trip; underfrequency will trip the RCP breakers open.

Table 3.3.1-1 (page 4 of 8) Reactor Trip System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLI VALUE
4. Turbine Trip					
a. Low Autostop Oil Pressure	1(h)	3	N	SR 3.3.1.10 SR 3.3.1.15	≥ 45 psig
b. Turbine Stop Valve Closure	1(h)	2	N	SR 3.3.1.15	NA
 Safety Injection (SI) Input from Engineered Safety Feature Actuation System (ESFAS) 	1, 2	2 trains	0	SR 3.3.1.14	NA

(h) Above the P-9 (Power Range Neutron Flux) interlock.

Prairie Island Units 1 and 2

Table 3.3.1-1 (page 5 of 8)Reactor Trip System Instrumentation

· · · · · · · · · · · · · · · · · · ·	APPLICABLE MODES OR OTHER				
FUNCTION	SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLI VALUE
 Reactor Trip System Interlocks 					
a. Intermediate Range Neutron Flux, P-6	2 ^(d)	2	Q	SR 3.3.1.11 SR 3.3.1.13	≥ 1.0E-10 amp
 b. Low Power Reactor Trips Block, P-7 					
I. Power Range Neutron Flux	1	4	R	SR 3.3.1.11 SR 3.3.1.13	≤ 12% RTP
2. Turbine Impulse Pressure	1	2	R	SR 3.3.1.10 · SR 3.3.1.13	≤ 12% Full Load
c. Power Range Neutron Flux, P-8	1	4	R	SR 3.3.1.11 SR 3.3.1.13	≤ 11% RTP
d. Power Range Neutron Flux, P-9	1	4	R	SR 3.3.1.11 SR 3.3.1.13	≤ 12% RTP
e. Power Range Neutron Flux, P-10	1, 2	4	Q	SR 3.3.1.11 SR 3.3.1.13	≥ 9% RTP
7. Reactor Trip Breakers ⁽¹⁾ (RTBs)	1,2	2 trains	Р	SR 3.3.1.4	NA
Dreakers** (KIBS)	3(a) _{, 4} (a) _{, 5} (a)	2 trains	С	SR 3.3.1.4	NA

(a) With Rod Control System capable of rod withdrawal or one or more rods not fully inserted.

(d) Below the P-6 (Intermediate Range Neutron Flux) interlocks.

(i) Including any reactor trip bypass breakers that are racked in and closed for bypassing an RTB.

Prairie Island Units 1 and 2

3.3.1-20

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FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
 Reactor Trip Breaker Undervoltage and Shunt Trip Mechanisms (j) 	1, 2	l each per RTB	S	SR 3.3.1.4	NA
	3(a) _{, 4} (a) _{, 5} (a)	1 each per RTB	С	SR 3.3.1.4	NA
19. Automatic Trip Logic	1,2	2 trains	Ο	SR 3.3.1.5	NA
	3(a), 4(a), 5(a)	2 trains	С	SR 3.3.1.5	NA

Table 3.3.1-1 (page 6 of 8) Reactor Trip System Instrumentation

(a) With Rod Control System capable of rod withdrawal or one or more rods not fully inserted.

(j) Only applies to breakers OPERABLE and closed.

Table 3.3.1-1 (page 7 of 8) Reactor Trip System Instrumentation

Note 1: Overtemperature ΔT

The Overtemperature ΔT Function Allowable Value is defined by the following Trip Setpoint.

$$\Delta \mathbf{T} \leq \Delta \mathbf{T}_0 \left\{ \mathbf{K}_1 - \mathbf{K}_2 (\mathbf{T} - \mathbf{T}') \left[\frac{(1 + \tau_1 \mathbf{s})}{(1 + \tau_2 \mathbf{s})} \right] + \mathbf{K}_3 (\mathbf{P} - \mathbf{P}') - \mathbf{f}(\Delta \mathbf{I}) \right\}$$

Where: ΔT is measured Reactor Coolant System (RCS) ΔT , °F. ΔT_0 is the indicated ΔT at RTP, °F. s is the Laplace transform operator, sec⁻¹. T is the measured RCS average temperature, °F. T' is the nominal T_{avg} at RTP, = 567.3 °F.

> P is the measured pressurizer pressure, psig P' is the nominal RCS operating pressure, = 2235 psig

 $K_1 \le 1.11$ $K_2 = 0.009/^{\circ}F$ $K_3 = 0.000566/psig$ $\tau_1 = 30 sec$ $\tau_2 = 4 sec$

 $\begin{aligned} f(\Delta I) &= 0.0150 \{ 12 + (q_t - q_b) \} & \text{when } q_t - q_b \leq -12\% \text{ RTP} \\ 0\% \text{ of } \text{RTP} & \text{when } -12\% \text{ RTP} < q_t - q_b \leq 9\% \text{ RTP} \\ 0.0250 \{ (q_t - q_b) - 9 \} & \text{when } q_t - q_b > 9\% \text{ RTP} \end{aligned}$

Where q_t and q_b are percent RTP in the upper and lower halves of the core, respectively, and $q_t + q_b$ is the total THERMAL POWER in percent RTP.

Prairie Island Units 1 and 2

3.3.1-22

Table 3.3.1-1 (page 8 of 8) Reactor Trip System Instrumentation

Note 2: Overpower ΔT

The Overpower ΔT Function Allowable Value is defined by the following Trip Setpoint.

$$\Delta \mathbf{T} \leq \Delta \mathbf{T}_0 \left\{ \mathbf{K}_4 - \mathbf{K}_5 \frac{\tau_3 \mathbf{s} \mathbf{T}}{1 + \tau_3 \mathbf{s}} - \mathbf{K}_6 (\mathbf{T} - \mathbf{T}') - \mathbf{f} (\Delta \mathbf{I}) \right\}$$

Where: ΔT is measured RCS ΔT , °F. ΔT_0 is the indicated ΔT at RTP, °F. s is the Laplace transform operator, sec⁻¹. T is the measured RCS average temperature, °F. T' is the nominal T_{avg} at RTP, = 567.3 °F.

 $K_4 \leq 1.10$

 $K_5 = 0.0275/^{\circ}F$ for increasing T_{avg} = 0/°F for decreasing T_{avg}

 $K_6 = 0.002/^\circ F$ when T > T'= $0/^\circ F$ when $T \le T'$

 $\tau_3 = 10 \sec \theta$

 $f(\Delta I) = As$ defined in Note 1

Prairie Island Units 1 and 2

3.3.1-23

3.3 INSTRUMENTATION

- 3.3.2 Engineered Safety Feature Actuation System (ESFAS) Instrumentation
- LCO 3.3.2 The ESFAS instrumentation for each Function in Table 3.3.2-1 shall be OPERABLE.

APPLICABILITY: According to Table 3.3.2-1.

ACTIONS

NOTE	
Separate Condition entry is allowed for each Function.	

	· · · · · · · · · · · · · · · · · · ·	-
CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more Functions with one or more required channels or trains inoperable.	A.1 Enter the Condition referenced in Table 3.3.2-1 for the channel(s) or train(s).	Immediately
B. One channel or train inoperable.	B.1 Restore channel or train to OPERABLE status.	48 hours
	OR	
	B.2.1 Be in MODE 3.	54 hours
	AND	Х.
	B.2.2 Be in MODE 5.	84 hours

Prairie Island Units 1 and 2

3.3.2-1

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CONDITION	REQUIRED ACTION	COMPLETION TIME
C. One train inoperable.	NOTE One train may be bypassed for up to 8 hours for surveillance testing provided the other train is OPERABLE.	
	C.1 Restore train to OPERABLE status.	6 hours
	OR	
	C.2.1 Be in MODE 3.	12 hours
	AND	
	C.2.2 Be in MODE 5.	42 hours
D. One channel inoperable.	NOTE The inoperable channel may be bypassed for up to 4 hours for surveillance testing of other channels.	
	D.1 Place channel in trip.	6 hours
	OR	
- · · ·	D.2.1 Be in MODE 3.	12 hours
	AND	
	D.2.2 Be in MODE 4.	18 hours

Prairie Island Units 1 and 2

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3.3.2-2

ESFAS Instrumentation 3.3.2

ACTIONS (continued)

CTIONS (continued)		•
CONDITION	REQUIRED ACTION	COMPLETION TIME
E. Two Containment Pressure channels inoperable.	NOTE The tripped channel may be bypassed for up to 4 hours for surveillance testing.	
	E.1.1 Verify one channel tripped per Required Action D.1.	Immediately
	AND	
	E.1.2 Place the other channel in bypass.	6 hours
	OR	
	E.2.1 Be in MODE 3.	12 hours
	AND	
	E.2.2 Be in MODE 4.	18 hours

Prairie Island Units 1 and 2

3.3.2-3

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
F. One train inoperable.	NOTE One train may be bypassed for up to 8 hours for surveillance testing provided the other train is OPERABLE.	
	F.1 Restore train to OPERABLE status.	6 hours
	OR F.2.1 Be in MODE 3.	12 hours
	<u>AND</u> F.2.2 Be in MODE 4.	18 hours
G. One channel inoperable.	NOTE The inoperable channel may be bypassed for up to 4 hours for surveillance testing of other channels.	
	G.1 Place channel in trip. <u>OR</u>	6 hours
	G.2 Be in MODE 3.	12 hours

Prairie Island Units 1 and 2

3.3.2-4

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ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
H. One or both channel(s) inoperable on one bus.	NOTE One inoperable channel may be bypassed for up to 4 hours for surveillance testing of other channels.	
	H.1 Place channel(s) in trip.	6 hours
	H.2 Be in MODE 3.	12 hours
I. One channel or train inoperable.	I.1 Enter applicable Condition(s) and Required Action(s) of Specification 3.7.5 for the associated Auxiliary Feedwater (AFW) train.	Immediately

Prairie Island Units 1 and 2

SURVEILLANCE REQUIREMENTS

Refer to Table 3.3.2-1 to determine which SRs apply for each ESFAS Function.

	SURVEILLANCE	FREQUENCY
SR 3.3.2.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.2.2	Perform ACTUATION LOGIC TEST.	31 days on a STAGGERED TEST BASIS
SR 3.3.2.3	Perform COT.	92 days
SR 3.3.2.4	NOTE Verification of setpoint not required.	
	Perform TADOT.	24 months
SR 3.3.2.5	NOTE Verification of setpoint not required.	
	Perform TADOT.	24 months on a STAGGERED TEST BASIS

Prairie Island Units 1 and 2

SURVEILLANCE REQUIREMENTS (continued)

	SURVEILLANCE	FREQUENCY
SR 3.3.2.6	NOTE This Surveillance shall include verification that the time constants are adjusted to the prescribed values.	
	Perform CHANNEL CALIBRATION.	24 months

Prairie Island Units 1 and 2

3.3.2-7

FUNCTION	MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
			Comprise		
. Safety Injection					
a. Manual Initiation	1, 2, 3, 4	2	В	SR 3.3.2.5	NA
 b. Automatic Actuation Relay Logic 	1, 2, 3, 4	2 trains	С	SR 3.3.2.2	NA
c. High Containment Pressure	1, 2, 3	3	D	SR 3.3.2.1 SR 3.3.2.3 SR 3.3.2.6	≤ 4.0 psig
d. Pressurizer Low Pressure	1, 2, 3 ^(a)	3	D	SR 3.3.2.1 SR 3.3.2.3 SR 3.3.2.6	≥ 1760 psig
e. Steam Line Low Pressure	1, 2, 3(a)	3 per steam line	D	SR 3.3.2.1 SR 3.3.2.3 SR 3.3.2.6	≥ 500 ^(b) psig
2. Containment Spray					
a. Manual Initiation	1, 2, 3, 4	2	В	SR 3.3.2.4	NA
b. Automatic Actuation Relay Logic	1, 2, 3, 4	2 trains	C	SR 3.3.2.2	NA

Table 3.3.2-1 (page 1 of 4) Engineered Safety Feature Actuation System Instrumentation

(a) Pressurizer Pressure \geq 2000 psig.

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(b) Time constants used in the lead/lag controller are $t_1 \ge 12$ seconds and $t_2 \le 2$ seconds.

Prairie Island Units 1 and 2

3.3.2-8

-	FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
2.	Containment Spray	CONDITIONS	CHANNELS	CONDITIONS	REQUIREMENTS	VALUE
	(continued)					
	c. High-High Containment	1, 2, 3	3 sets of 2	D, E	SR 3.3.2.1 SR 3.3.2.3	≤ 23 psig
	Pressure				SR 3.3.2.6	
3.	Containment					
	Isolation					
	a. Manual Initiation	1, 2, 3, 4	2	В	SR 3.3.2.4	NA
	b. Automatic Actuation	1, 2, 3, 4	2 trains	С	SR 3.3.2.2	NA
	Relay Logic					
	c. Safety Injection	Refer to Funct requirements.	ion 1 (Safety Inje	ction) for all initiat	ion functions and	
4.	Steam Line Isolation					
	a. Automatic	1, 2 ^(c) , 3 ^(c)	2 trains	F	SR 3.3.2.2	NA
	Actuation Relay Logic					
	b. High-High	1, 2 ^(c) , 3 ^(c)	3	D	SR 3.3.2.1	≤ 17
	Containment				SR 3.3.2.3	psig
	Pressure				SR 3.3.2.6	

Table 3.3.2-1 (page 2 of 4) Engineered Safety Feature Actuation System Instrumentation

(c) Except when both Main Steam Isolation Valves (MSIVs) are closed.

Prairie Island Units 1 and 2

		· · · · · · · · · · · · · · · · · · ·				
	FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
-						
4.	Steam Line					
	Isolation					
	(continued)			-		
	c. Low-Low T _{avg}	1, 2(c), 3(c)(d)	4	D	SR 3.3.2.1	≥ 542°F
	-	1,21,0			SR 3.3.2.3	
			• •		SR 3.3.2.6	
	Coincident with Safety Injection	Refer to Function requirements.	l (Safety Injection) for all initiation f	unctions and	·
	d. High High Steam Flow	1, 2 ^(c) , 3 ^(c)	2 per steam line	D	SR 3.3.2.1 SR 3.3.2.3 SR 3.3.2.6	≤ 4.5E6 lb/hr a 735 psig
	Coincident with Safety Injection	Refer to Function i requirements.	I (Safety Injection) for all initiation f	unctions and	
5.	Feedwater					
	Isolation					
	a. Automatic Actuation	1,2 ^(e) , 3 ^(e)	2 trains	F	SR 3.3.2.2	NA
	Relay Logic				•	
	b. High-High	1, 2 ^(e)	3 per SG	G	SR 3.3.2.1	. ≤ 90%
	Steam				SR 3.3.2.3	
	Generator (SG)				SR 3.3.2.6	
	Water Level					
			-1 - 1			

Table 3.3.2-1 (page 3 of 4) Engineered Safety Feature Actuation System Instrumentation

(c) Except when both MSIVs are closed.

(d) Reactor Coolant System (RCS) $T_{avg} \ge 520^{\circ}F$.

(e) Except when all Main Feedwater Regulation Valves (MFRVs), and MFRVs bypass valves are closed and in manual or isolated by a closed non-automatic valve.

Prairie Island Units 1 and 2

3.3.2-10

	FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLI VALUE
5.	Feedwater Isolation (continued)			· ·		
	c. Safety Injection	Refer to Function	1 (Safety Injection	n) for all initiation f	unctions and requireme	nts.
6.	Auxiliary Feedwater					
	a. Automatic Actuation Relay Logic	1, 2, 3	2 trains	I	SR 3.3.2.2	. NA
	b. Low-Low SG Water Level	1, 2, 3	3 per SG	D	SR 3.3.2.1 SR 3.3.2.3 SR 3.3.2.6	· ≥ 5%
	c. Safety Injection	Refer to Function requirements.	I (Safety Injection	h) for all initiation f	unctions and	·
	 d. Undervoltage on Buses 11 and 12 (21 and 22)^(f) 	1,2	2 per bus	Н	SR 3.3.2.4 SR 3.3.2.6	≥ 76% bus voltage
	e. Trip of both Main Feedwater Pumps	1, 2 ^(g)	2 per pump	I	SR 3.3.2.4	NA

Table 3.3.2-1 (page 4 of 4) Engineered Safety Feature Actuation System Instrumentation

(f) Start of Turbine Driven Pump only.

(g) This function may be bypassed during alignment and operation of the AFW System for SG level control.

Prairie Island Units 1 and 2

3.3.2-11

3.3 INSTRUMENTATION

3.3.3 Event Monitoring (EM) Instrumentation

LCO 3.3.3 The EM instrumentation for each Function in Table 3.3.3-1 shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

-----NOTES------

1. LCO 3.0.4 is not applicable.

- 2. Separate Condition entry is allowed for each Function.
- 3. Required Core Exit Thermocouple (CET) Channels shall be OPERABLE prior to MODE 2 following each refueling outage.

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CONDITION	REQUIRED ACTION	COMPLETION TIME
ANOTE Not applicable to Core Exit Thermocouples (CETs).	A.1 Restore required channel to OPERABLE status.	30 days
One or more Functions with one required channel inoperable.		

Prairie Island Units 1 and 2

3.3.3-1

ACTIONS (continued)

	CONDITION		REQUIRED ACTION	COMPLETION TIME
в.	One or more required CETs channel(s) inoperable.	B.1	Restore required CET channel(s) to OPERABLE status.	30 days
	AND			
	At least 4 CETs OPERABLE in the center region of the core.			
	AND			
	At least one CET OPERABLE in each quadrant of the outside core region.			
C.	Required Action and associated Completion Time of Condition A or B not met.	C.1	Submit a report to the NRC.	14 days
D.	NOTE Not applicable to hydrogen monitor or CET channels.	D.1	Restore one channel to OPERABLE status.	7 days
	One or more Functions with two required channels inoperable.			

Prairie Island Units 1 and 2

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ACTIONS (continued)

	CONDITION		REQUIRED ACTION	COMPLETION TIME
E.	Two hydrogen monitor channels inoperable.	E.1	Restore one hydrogen monitor channel to OPERABLE status.	72 hours
F.	Three or more required CET channels inoperable in one or more quadrants. AND	F.1	Restore required inoperable channels to OPERABLE status.	7 days
	Less than four CETs OPERABLE in the center region of the core.			
G.	Three or more required CET channels inoperable in one or more quadrants.	G.1	Restore required inoperable channels to OPERABLE status.	7 days
	AND			
	Less than one CET OPERABLE in each quadrant of the outside core region.		•	
Н.	Required Action and associated Completion Time of Condition D, E, F or G not met.	H.1	Enter the Condition referenced in Table 3.3.3-1 for the channel.	Immediately

Prairie Island Units 1 and 2 ACTIONS (continued)

	CONDITION		REQUIRED ACTION	COMPLETION TIME
I.	As required by Required Action H.1 and referenced in Table 3.3.3-1.	I.1	Be in MODE 3.	6 hours
J.	As required by Required Action H.1 and referenced in Table 3.3.3-1.	J.1	Submit a report to the NRC.	14 days

Prairie Island Units 1 and 2

EM Instrumentation 3.3.3

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.3.3.1	Perform CHANNEL CHECK for each required instrumentation channel that is normally energized.	31 days
SR 3.3.3.2	NOTE Neutron detectors are excluded from CHANNEL CALIBRATION.	
	Perform CHANNEL CALIBRATION.	24 months
SR 3.3.3.3	NOTE Verification of setpoint is not required.	24 months
	Perform TADOT.	• • • • •

Prairie Island Units 1 and 2

Table 3.3.3-1 (page 1 of 1) Event Monitoring Instrumentation

	FUNCTION	REQUIRED CHANNELS	CONDITION REFERENCED FROM REQUIRED ACTION H.1
1.	Power Range Neutron Flux (Logarithmic Scale)	2	I
2.	Source Range Neutron Flux (Logarithmic Scale)	2	I
3.	Reactor Coolant System (RCS) Hot Leg Temperature	2	I
4.	RCS Cold Leg Temperature	2	I
5.	RCS Pressure (Wide Range)	2	I
6.	Reactor Vessel Water Level	2	J
7.	Containment Sump Water Level (Wide Range)	2	Ι
8.	Containment Pressure (Wide Range)	2	I
9.	Penetration Flow Path Automatic Containment Isolation Valve Position	2 per penetration flow path ^{(a)(b)}	Ι
10.	Containment Area Radiation (High Range)	2	J
11.	Hydrogen Monitors	2	I
12.	Pressurizer Level	2	. I
13.	Steam Generator Water Level (Wide Range)	2 per steam generator	I
14.	Condensate Storage Tank Level	2	Ι
15.	Core Exit Temperature	4 per quadrant ^(c)	I
16.	Refueling Water Storage Tank Level	2	I

(a) Not required for isolation valves whose associated penetration is isolated by at least one closed and deactivated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured.

(b) Only one position indication channel is required for penetration flow paths with only one installed control room indication channel.

(c) A channel consists of one core exit thermocouple (CET).

Prairie Island Units 1 and 2

3.3 INSTRUMENTATION

- 3.3.4 4 kV Safeguards Bus Voltage Instrumentation
- LCO 3.3.4 The following 4 kV safeguards bus voltage instrumentation Functions shall be OPERABLE:
 - a. Two channels per bus of the undervoltage Function;
 - b. Two channels per bus of the degraded voltage Function; and
 - c. Two trains of automatic load sequencers.

APPLICABILITY: MODES 1, 2, 3, and 4, When associated Diesel Generator (DG) is required to be OPERABLE by LCO 3.8.2, "AC Sources-Shutdown."

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Function a or b or both with one channel per bus inoperable.	A.1 Place channel in bypass.	6 hours

Prairie Island Units 1 and 2

3.3.4-1

.12/11/00

4 kV Safeguards Bus Voltage Instrumentation 3.3.4

ACTIONS (continued)

	CONDITION		REQUIRED ACTION	COMPLETION TIME
B.	NOTE Only applicable in MODE 1, 2, 3, or 4.	B.1	B.1 Perform SR 3.3.4.1 for OPERABLE automatic load sequencer.	6 hours <u>AND</u>
	Required Action and associated Completion Time of Condition A not met.	AND	· · · · · · · · · · · · · · · · · · ·	Once per 24 hours thereafter
	OR Function a or b or both with two channels per bus inoperable.	B.2 AND	Establish offsite paths block loading capability for associated 4 kV safeguards bus.	8 hours
	OR One required automatic load sequencer	B.3	Verify operability of offsite paths for associated 4kV safeguards bus.	8 hours <u>AND</u>
	inoperable.			Once per 8 hours thereafter.
		<u>AND</u> B.4		7 days

Prairie Island Units 1 and 2

4 kV Safeguards Bus Voltage Instrumentation 3.3.4

ACTIONS (continued)

	CONDITION		REQUIRED ACTION	COMPLETION TIME
C.	Required Action and associated Completion Time of Condition B not met.	C.1 <u>ANI</u> C.2	Be in MODE 3. <u>2</u> Be in MODE 5.	6 hours 36 hours
D.	 NOTE	D.1	Enter applicable LCO 3.8.2 Condition(s) and Required Action(s) for the associated DG.	Immediately

Prairie Island Units 1 and 2

4 kV Safeguards Bus Voltage Instrumentation 3.3.4

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.3.4.1	Perform COT.	31 days
SR 3.3.4.2	 Perform CHANNEL CALIBRATION with Allowable Value as follows: a. Undervoltage Allowable Value ≥ 3016 V and ≤ 3224 V with an undervoltage time delay of 4 ± 1.5 seconds. b. Degraded voltage Allowable Value ≥ 3944 V and ≤ 4002 V with a degraded voltage time delay of 	24 months
	8 \pm 0.5 seconds and degraded voltage DG start time delay of 60 \pm 3 seconds.	

Prairie Island Units 1 and 2

3.3 INSTRUMENTATION

3.3.5 Containment Ventilation Isolation Instrumentation

LCO 3.3.5 The Containment Ventilation Isolation instrumentation for each Function in Table 3.3.5-1 shall be OPERABLE.

APPLICABILITY: According to Table 3.3.5-1.

ACTIONS

Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One radiation monitoring train inoperable.	A.1 Place and maintain containment inservice (low flow) purge valves in closed position.	4 hours

ACTIONS (continued)

		·	<u>18</u>	I	
	CONDITION	CONDITION REQUIRED ACTION		COMPLETION TIME	
B.	NOTE Only applicable in MODE 1, 2, 3, or 4.	B.1	Place and maintain containment inservice (low flow) purge valves in closed position.	Immediately	
	One or more Functions (except radiation monitors) with one or more manual or automatic actuation trains inoperable. <u>OR</u> Two radiation monitoring trains inoperable.	<u>OR</u> B.2	Enter applicable Conditions and Required Actions of LCO 3.6.3, "Containment Isolation Valves," for containment inservice (low flow) purge valves made inoperable by isolation instrumentation.	Immediately	
	<u>OR</u> Required Action and associated Completion Time of Condition A not met.				

Prairie Island Units 1 and 2

• --

ACTIONS (continued)

CO	NDITION		REQUIRED ACTION	COMPLETION TIME
Only a CORE or mov irradia	NOTE pplicable during ALTERATIONS rement of ted fuel plies within iment.	C.1 <u>OR</u>	Place and maintain containment inservice (low flow) purge valves in closed position.	Immediately
(excep monito more n automa	more Functions t radiation ors) with one or nanual or atic actuation noperable.	C.2	Enter applicable Conditions and Required Actions of LCO 3.9.4, "Containment Penetrations," for containment inservice (low flow) purge valves made inoperable by isolation instrumentation.	Immediately
OR				
	ndiation pring trains able.			
OR				
associa	ed Action and ated Completion for Condition A t.			

Prairie Island Units 1 and 2

SURVEILLANCE REQUIREMENTS

· · · · · · · · · · · · · · · · · · ·		
· · · · · · · · · · · · · · · · · · ·	SURVEILLANCE	FREQUENCY
SR 3.3.5.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.5.2	Perform ACTUATION LOGIC TEST.	31 days on a STAGGERED TEST BASIS
SR 3.3.5.3	Perform COT.	31 days
SR 3.3.5.4	NOTE Verification of setpoint is not required. Perform TADOT.	24 months
SR 3.3.5.5	Perform CHANNEL CALIBRATION.	24 months

Prairie Island Units 1 and 2

3.3.5-4

		APPLICABLE MODES OR		· · · · · · · · · · · · · · · · · · ·	
	FUNCTION	OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1.	Manual Initiation	1 ^(a) , 2 ^(a) , 3 ^(a) , 4 ^(a) , (b)	2	SR 3.3.5.4	NA
2.	Automatic Actuation Relay Logic	1 ^(a) , 2 ^(a) , 3 ^(a) , 4 ^(a) , (b)	2 trains	SR 3.3.5.2	NA
3.	High Radiation in Exhaust Air	1 ^(a) , 2 ^(a) , 3 ^(a) , 4 ^(a) , (b)	2 trains	SR 3.3.5.1 SR 3.3.5.3 SR 3.3.5.5	(c)
4.	Manual Containment Isolation	1 ^(a) , 2 ^(a) , 3 ^(a) , 4 ^(a)		.2, "ESFAS Instrumentation is and requirements.	n," Function 3.a., for
5.	Safety Injection	$1^{(a)}, 2^{(a)}, 3^{(a)}, 4^{(a)}$.2, "ESFAS Instrumentation is and requirements.	n," Function 1, for
6.	Manual Containment Spray	1 ^(a) , 2 ^(a) , 3 ^(a) , 4 ^(a)		.2, "ESFAS Instrumentation as and requirements.	n," Function 2, for

Table 3.3.5-1 (page 1 of 1) Containment Ventilation Isolation Instrumentation

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(a) When the Containment Inservice Purge System is not isolated.

(b) During CORE ALTERATIONS and movement of irradiated fuel assemblies within containment when the Containment Inservice Purge System is not isolated.

(c) < count rate corresponding to 500 mrem/year whole body and 3000 mrem/year skin due to noble gases at the site boundary.

Prairie Island Units 1 and 2

B 3.3 INSTRUMENTATION

B 3.3.1 Reactor Trip System (RTS) Instrumentation

BASES

BACKGROUND

AEC GDC Criterion 14, "Core Protection Systems" (Ref. 1), requires that core protection systems, together with associated equipment, shall be designed to prevent or suppress conditions that could result in exceeding acceptable fuel damage limits. The RTS initiates a unit shutdown, based on the values of selected unit parameters, to protect against violating the core fuel design limits and Reactor Coolant System (RCS) pressure boundary during anticipated operational occurrences (AOOs) and to assist the Engineered Safety Features (ESF) Systems in mitigating accidents.

The protection and monitoring systems have been designed to assure safe operation of the reactor. This is achieved by specifying limiting safety system settings (LSSS) in terms of parameters directly monitored by the RTS, as well as specifying LCOs on other reactor system parameters and equipment performance.

Technical specifications are required by 10CFR50.36 to contain LSSS defined by the regulation as "... settings for automatic protective devices ... so chosen that automatic protective action will correct the abnormal situation before a safety limit (SL) is exceeded." The analytical limit is the limit of the process variable at which a safety action is initiated, as established by the safety analysis, to ensure that a SL is not exceeded. Any automatic protection action that occurs on reaching the analytical limit therefore ensures that the SL is not exceeded. However, in practice, the actual settings for automatic protective devices must be chosen to be more conservative than the analytical limit to account for instrument loop uncertainties related to the setting at which the automatic protective action would actually occur.

The trip setpoint is a predetermined setting for a protective device chosen to ensure automatic actuation prior to the process variable

Prairie Island Units 1 and 2

BACKGROUND (continued)

reaching the analytical limit and thus ensuring that the SL would not be exceeded. As such, the trip setpoint accounts for uncertainties in setting the device (e.g., calibration), uncertainties in how the device might actually perform (e.g., repeatability), changes in the point of action of the device over time (e.g., drift during surveillance intervals), and any other factors which may influence its actual performance (e.g., harsh accident environments). In this manner, the trip setpoint plays an important role in ensuring that SLs are not exceeded. As such, the trip setpoint meets the definition of on LSSS (Ref. 2) and could be used to meet the requirement that they be contained in the technical specifications.

Technical specifications contain values related to the OPERABILITY of equipment required for safe operation of the facility. OPERABLE is defined in technical specifications as "... being capable of performing its safety function(s)." For automatic protective devices, the required safety function is to ensure that a SL is not exceeded and therefore the LSSS as defined by 10CFR50.36 is the same as the OPERABILITY limit for these devices. However, use of the trip setpoint to define OPERABILITY in technical specifications and its corresponding designation as the LSSS required by 10CFR50.36 would be an overly restrictive requirement if it were applied as an OPERABILITY limit for the "as-found" value of a protective device setting during a surveillance. This would result in technical specification compliance problems, as well as reports and corrective actions required by the rule which are necessary to ensure safety. For example, an automatic protective device with a setting that has been found to be different from the trip setpoint due to some drift of the setting may still be OPERABLE since drift is to be expected. This expected drift would have been specifically accounted for in the setpoint methodology for calculating the trip setpoint and thus the automatic protective action would still have ensured that the SL would not be exceeded with the "as-found" setting of the protective device. Therefore, the device would still be OPERABLE since it would have performed its safety

Prairie Island Units 1 and 2

BACKGROUND (continued)

function and the only corrective action required would be to reset the device to the trip setpoint to account for further drift during the next surveillance interval.

Use of the trip setpoint to define "as-found" OPERABILITY and its designation as the LSSS under the expected circumstances described above would result in actions required by both the rule and technical specifications that are clearly not warranted. However, there is also some point beyond which the device would have not been able to perform its function due, for example, to greater than expected drift. This value needs to be specified in the technical specifications in order to define OPERABILITY of the devices and is designated as the Allowable Value which, as stated above, is the same as the LSSS.

The Allowable Value specified in Table 3.3.1-1 serves as the LSSS such that a channel is OPERABLE if the actual setting is found not to exceed the Allowable Value during the CHANNEL OPERATIONAL TEST (COT). As such, the Allowable Value differs from the trip setpoint by an amount primarily equal to the expected instrument loop uncertainties, such as drift, during the surveillance interval. In this manner, the actual setting of the device will still meet the LSSS definition and ensure that a safety limit is not exceeded at any given point of time as long as the device has not drifted beyond that expected during the surveillance interval. If the actual setting of the device is found to have exceeded the Allowable Value the device would be considered inoperable from a technical specification perspective. This requires corrective action including those actions required by 10CFR50.36 when automatic protective devices do not function as required. Note that, although the channel is "OPERABLE" under these circumstances, the trip setpoint should be left adjusted to a value within the established trip setpoint calibration tolerance band, in accordance with uncertainty assumptions stated in the referenced setpoint methodology (as-left criteria), and confirmed to be operating within the statistical allowances of the uncertainty terms assigned.

Prairie Island Units 1 and 2

B 3.3.1-3

BACKGROUND (continued)	During AOOs, which are those events expected to occur one or mor times during the unit life, the acceptable limits (Ref. 3) are:
	1. The departure from nucleate boiling ratio (DNBR) shall be maintained to prevent departure from nucleate boiling (DNB);
	2. Fuel centerline melt shall not occur; and
	3. The RCS pressure SL of 2735 psig shall not be exceeded.
	Operation within the SLs of Specification 2.0, "Safety Limits (SLs)," also maintains the above values and assures that offsite dos will be within the 10 CFR 100 criteria during AOOs.
	Accidents are events that are analyzed even though they are not expected to occur during the unit life. One acceptable limit during accidents is that offsite dose shall be maintained within an acceptable fraction of 10 CFR 100 limits. Different accident categories are allowed a different fraction of these limits, based on probability of occurrence. Meeting the acceptable dose limit for an accident category is considered having acceptable consequences for that event.
	The RTS instrumentation is segmented into interconnected portions as described in the USAR (Ref. 4), and as identified below:
	1. Field transmitters or process sensors: provide a measurable electronic signal based upon the physical characteristics of the parameter being measured;
	2. Reactor Protection Analog System and Nuclear Instrumentation System (NIS), arranged in protection channel sets: provides signal conditioning, bistable setpoint comparison, bistable electrical signal output to protection system relay logic, and control board/control room/miscellaneous indications;

Prairie Island Units 1 and 2

BACKGROUND (continued)	3.	Reactor Protection Relay Logic System, including channelized input and logic: initiates proper unit shutdown and/or ESF actuation in accordance with the defined logic, which is based on the bistable outputs from the analog protection system and NIS; and
	4.	Reactor trip switchgear, including reactor trip breakers (RTBs) and bypass breakers: provides the means to interrupt power to

and bypass breakers: provides the means to interrupt power to the control rod drive mechanisms (CRDMs) and allows the rod cluster control assemblies (RCCAs), or "rods," to fall into the core and shut down the reactor. The bypass breakers allow testing of the RTBs at power.

Field Transmitters or Sensors

To meet the design demands for redundancy and reliability, more than one, and often as many as four, field transmitters or sensors are used to measure unit parameters. To account for the calibration tolerances and instrument drift, which are assumed to occur between calibrations, statistical allowances are provided in the trip setpoint and Allowable Values. The OPERABILITY of each transmitter or sensor is determined by either "as-found" calibration data evaluated during the CHANNEL CALIBRATION or by qualitative assessment of field transmitter or sensor as related to the channel behavior observed during performance of the CHANNEL CHECK.

Reactor Protection Analog and NI Systems

Generally, two to four channels of instrumentation are used for the signal processing of unit parameters measured by the field instruments. The instrument channels provide signal conditioning, comparable output signals for instruments located on the main control board, and comparison of measured input signals with setpoints that are based on safety analyses (Ref. 3). If the measured value of a unit parameter exceeds the predetermined setpoint, an

Prairie Island Units 1 and 2

B 3.3.1-5

BACKGROUND Reactor Protection Analog and NI Systems (continued)

output from a bistable actuates logic input relays. Channel separation is described in Reference 4. However, not all unit parameters require four channels of sensor measurement and signal processing. Some unit parameters provide input only to the protection logic, main control board indication, and the plant computer. In addition, some provide input to one or more control systems.

Generally, if a parameter is used only for input to the protection circuits, three channels with a two-out-of-three logic are sufficient to provide the required reliability and redundancy. If one channel fails in a direction that would not result in a partial Function trip, the Function will still operate with a two-out-of-two logic. If one channel fails, such that a partial Function trip occurs, a trip will not occur and the Function will still operate with a one-out-of-two logic.

If a parameter is used for input to the protection logic and a control function, the circuit must be able to withstand both an input failure to the control system, which may then require the protection function actuation, and a single failure in the other channels providing the protection function actuation. These requirements are described in IEEE-279-1971. Where necessary to provide the required reliability and redundancy, four channels with a two-out-of-four logic, or median signal selection and signal validation are provided. The actual number of channels required for each unit parameter is specified in Reference 4. Again, a single failure will neither cause nor prevent the protection function actuation.

Allowable Values and RTS Setpoints

The trip setpoints used in the bistables are based on the analytical limits from Reference 3. The selection of these trip setpoints is such that adequate protection is provided when all sensor and processing time delays are taken into account. To allow for calibration

Prairie Island Units 1 and 2

B 3.3.1-6

BACKGROUND Allowable Values and RTS Setpoints (continued)

tolerances, instrumentation uncertainties, instrument drift, and severe environment errors for those RTS channels that must function in harsh environments as defined by 10 CFR 50.49, the Allowable Values specified in Table 3.3.1-1 in the accompanying LCO are conservative with respect to the analytical limits. A detailed description of the methodology used to calculate the Allowable Values and trip setpoints, including their explicit uncertainties, is provided in the plant specific setpoint methodology study (Ref. 5) which incorporates all of the known uncertainties applicable to each channel. The magnitudes of these uncertainties are factored into the determination of each trip setpoint and corresponding Allowable Value. The trip setpoint entered into the bistable is more conservative than that specified by the Allowable Value (LSSS) to account for measurement errors detectable by the COT. One example of such a change in measurement error is drift during the surveillance interval. If the measured setpoint does not exceed the Allowable Value, the bistable is considered OPERABLE.

The trip setpoint is the value at which the bistable is set and is the expected value to be achieved during calibration. The trip setpoint value ensures the LSSS and the safety analysis limits are met for the surveillance interval selected when a channel is adjusted based on stated channel uncertainties. Any bistable is considered to be properly adjusted when the "as-left" setpoint value is within the band for CHANNEL CALIBRATION uncertainty allowance (i.e., \pm rack calibration + bistable setting uncertainties).

Trip setpoints consistent with the requirements of the Allowable Value ensure that SLs and DNBR limits are not violated during AOOs (and that the consequences of DBAs will be acceptable, providing the unit is operated from within the LCOs at the onset of the AOO or DBA and the equipment functions as designed).

Each required instrument channel can be tested on line to verify that the signal or setpoint accuracy is within the specified allowance

Prairie Island Units 1 and 2

B 3.3.1-7

BACKGROUND Allowable Values and RTS Setpoints (continued)

requirements of Reference 5. Once a designated channel is taken out of service for testing, a simulated signal is injected in place of the field instrument signal. The instrumentation for the channel in test is then tested, verified, and calibrated. SRs for the channels are specified in the SRs section.

Reactor Protection Relay Logic System

The relay logic equipment uses outputs from the analog and NI bistables. To meet the redundancy requirements, two trains of relay logic, each performing the same functions, are provided. If one train is taken out of service for maintenance or test purposes, the second train will provide reactor trip for the unit. If both trains are taken out of service or placed in test, a reactor trip will result. Each train is packaged in its own set of cabinets for physical and electrical separation to satisfy separation and independence requirements. The system has been designed to provide a reactor trip in the event of a loss of power, directing the unit to a safe shutdown condition.

The bistable outputs are combined into logic matrices that represent combinations indicative of various unit upset and accident transients. If a required logic matrix combination is completed, the system will initiate a reactor trip. Examples are given in the Applicable Safety Analyses, LCO, and Applicability sections of this Bases.

Reactor Trip Switchgear

The RTBs are in the electrical power supply line from the control rod drive motor generator set power supply to the CRDMs. Opening of the RTBs interrupts power to the CRDMs, which allows the shutdown rods and control rods to fall into the core by gravity. Each RTB is equipped with a bypass breaker to allow testing of the RTB while the unit is at power. During normal operation the output from

Prairie Island Units 1 and 2

B 3.3.1-8

BACKGROUND Reactor Trip Switchgear (continued)

the relay logic is a contact signal that energizes the undervoltage coils in the RTBs, and bypass breakers if in use. When the required logic matrix combination is completed, the relay logic output contacts open, the undervoltage coils are de-energized, the breaker trip lever is actuated by the de-energized undervoltage coil, and the RTBs and bypass breakers are tripped open. This allows the shutdown rods and control rods to fall into the core. In addition to the de-energization of the undervoltage coils, each breaker is also equipped with a shunt trip device that is energized to trip the breaker open upon receipt of a reactor trip signal from the relay logic. Either the undervoltage coil or the shunt trip mechanism is sufficient by itself to open the RTBs, thus providing a diverse trip mechanism.

The logic matrix Functions are described in Reference 4. In addition to the reactor trip or ESF, Reference 4 also identifies the various "permissive interlocks" that are associated with unit conditions. Each train has built in test features that allow testing of the logic matrix Functions while the unit is at power. When any one train is taken out of service for testing, the other train is capable of providing unit monitoring and protection until the testing has been completed.

APPLICABLE SAFETY ANALYSES, LCO, AND APPLICABILITY The RTS functions to maintain the SLs and DNBR limits during AOOs as identified in Reference 3 and mitigates the consequences of DBAs in all MODES in which the Rod Control System is capable of rod withdrawal or one or more rods not fully inserted.

Each of the analyzed accidents and transients can be detected by one or more RTS Functions. The analysis described in Reference 3 takes credit for most RTS trip Functions. RTS trip Functions not specifically credited in the safety analysis are qualitatively credited in the safety analysis and the NRC staff approved licensing basis for the unit. These RTS trip Functions may provide protection for

Prairie Island Units 1 and 2

B 3.3.1-9

APPLICABLE SAFETY ANALYSES, LCO, AND APPLICABILITY (continued) conditions that do not require dynamic transient analysis. They may also serve as backups to RTS trip Functions that were credited in the accident analysis.

The LCO requires all instrumentation performing an RTS Function, listed in Table 3.3.1-1 in the accompanying LCO, to be OPERABLE. A channel is OPERABLE with an actual setpoint value outside its calibration tolerance provided the actual setpoint "as-found" value does not exceed its associated Allowable Value and provided the setpoint "as left" value is adjusted to a value within the "as-left" calibration tolerance band. Failure of any instrument renders the affected channel(s) inoperable and reduces the reliability of the affected Functions.

The LCO generally requires OPERABILITY of two, three, or four channels in each instrumentation Function, two channels of Manual Reactor Trip and two trains in each Automatic Trip Logic Function. Four OPERABLE instrumentation channels in a two-out-of-four configuration are required when RTS channels are also used as control system inputs and there is a possibility of the shared channel failing in such a manner that it creates a transient that requires RTS action. In this case, the RTS will still provide protection, even with random failure of one of the other three protection channels. Three OPERABLE instrumentation channels in a two-out-of-three configuration are generally required when there is no potential for control system and protection system interaction that could simultaneously create a need for RTS trip and disable one RTS channel. The two-out-of-three and two-out-of-four configurations allow one channel to be tripped during maintenance or testing without causing a reactor trip. Specific exceptions to the above general philosophy exist and are discussed below.

Prairie Island Units 1 and 2

B 3.3.1-10

APPLICABLE SAFETY ANALYSES, LCO, AND APPLICABILITY (continued)

Reactor Trip System Functions

The safety analyses and OPERABILITY requirements applicable to each RTS Function are discussed below:

1. Manual Reactor Trip

The Manual Reactor Trip ensures that the control room operator can initiate a reactor trip at any time by using either of two reactor trip switches in the control room. A Manual Reactor Trip accomplishes the same results as any one of the automatic trip Functions. It is used by the reactor operator to shut down the reactor whenever any parameter is rapidly trending toward its trip setpoint.

The LCO requires two Manual Reactor Trip channels to be OPERABLE. Each channel is controlled by a manual reactor trip switch. Each channel activates the reactor trip breakers in both trains. Two independent channels are required to be OPERABLE so that no single random failure will disable the Manual Reactor Trip Function.

In MODE 1 or 2, Manual Reactor Trip must be OPERABLE. These are the MODES in which the shutdown rods and/or control rods are partially or fully withdrawn from the core. In MODE 3, 4, or 5, the Manual Reactor Trip Function must also be OPERABLE if one or more shutdown rods or control rods are withdrawn or the Rod Control System is capable of withdrawing the shutdown rods or control rods. In this condition, inadvertent control rod withdrawal is possible. In MODE 3, 4, or 5, Manual Reactor Trip does not have to be OPERABLE if the Rod Control System is not capable of withdrawing the shutdown rods or control rods and if all rods are fully inserted. If the rods cannot be withdrawn from the core, or all of the rods are inserted there is no need to be able to trip the reactor. In MODE 6, the CRDMs are disconnected from the control rods and shutdown rods. Therefore, the Manual Reactor Trip Function is not required.

Prairie Island Units 1 and 2

B 3.3.1-11

Reactor Trip System Functions (continued)

Power Range Neutron Flux

SAFETY ANALYSES, LCO, AND APPLICABILITY

2.

APPLICABLE

The NIS power range detectors are located external to the reactor vessel and measure neutrons leaking from the core. The NIS power range detectors provide input to the reactor control system. Therefore, the actuation logic must be able to withstand an input failure to the control system, which may then require the protection function actuation, and a single failure in the other channels providing the protection function actuation. Note that this Function also provides a signal to prevent automatic and manual rod withdrawal prior to initiating a reactor trip. Limiting further rod withdrawal may terminate the transient and eliminate the need to trip the reactor.

a. Power Range Neutron Flux-High

The Power Range Neutron Flux — High trip Function ensures that protection is provided, from all power levels, against a positive reactivity excursion leading to DNB during power operations. These can be caused by rod withdrawal or reductions in RCS temperature.

The LCO requires all four of the Power Range Neutron Flux-High channels to be OPERABLE.

In MODE 1 or 2, when a positive reactivity excursion could occur, the Power Range Neutron Flux-High trip must be OPERABLE. This Function will terminate the reactivity excursion and shut down the reactor prior to reaching a power level that could damage the fuel. In MODE 3, 4, 5, or 6, the NIS power range channels cannot indicate neutron levels in this range. In these MODES, the Power Range Neutron Flux-High does not have to be OPERABLE because the reactor is shut down

Prairie Island Units 1 and 2

BASES	-	
APPLICABLE SAFETY ANALYSES, LCO, AND APPLICABILITY	a.	<u>Power Range Neutron Flux-High</u> (continued) and reactivity excursions into the power range are extremely unlikely. Other RTS Functions and administrative controls provide protection against reactivity additions when in MODE 3, 4, 5, or 6.
	b.	Power Range Neutron Flux-Low
		The LCO requirement for the Power Range Neutron Flux- Low trip Function ensures that protection is provided against a positive reactivity excursion from low power or subcritical conditions.
		The LCO requires all four of the Power Range Neutron Flux-Low channels to be OPERABLE.
		In MODE 1, below the Power Range Neutron Flux P-10 setpoint, and in MODE 2, the Power Range Neutron Flux- Low trip must be OPERABLE. This Function may be manually blocked by the operator when two-out-of-four power range channels are greater than the P-10 setpoint. This Function is automatically unblocked when three-out- of-four power range channels are below the P-10 setpoint. Above the P-10 setpoint, positive reactivity additions are mitigated by the Power Range Neutron Flux-High trip Function.
		In MODE 3, 4, 5, or 6, the Power Range Neutron Flux-Low trip Function does not have to be OPERABLE because the reactor is shut down and the NIS power range channels cannot indicate neutron levels in this range. Other RTS trip Functions and administrative controls provide protection against positive reactivity additions or power excursions in MODE 3, 4, 5, or 6.

Units 1 and 2

B 3.3.1-13

APPLICABLE	3.	Power Range Neutron Flux Rate
SAFETY		
ANALYSES,		The Power Range Neutron Flux Rate trips use the same
LCO, AND		channels as discussed for Function 2 above.
APPLICABILITY		
(continued)		a. Power Range Neutron Flux-High Positive Rate

The Power Range Neutron Flux-High Positive Rate trip Function ensures that protection is provided against rapid increases in neutron flux that are characteristic of an RCCA rod drive housing rupture and the accompanying ejection of the RCCA and uncontrolled RCCA withdrawal at power. This Function compliments the Power Range Neutron Flux-High and Low Setpoint trip Functions to ensure that the criteria are met for a rod ejection from the power range.

The LCO requires all four of the Power Range Neutron Flux-High Positive Rate channels to be OPERABLE.

In MODE 1 or 2, when there is a potential to add a large amount of positive reactivity from a rod ejection accident or uncontrolled RCCA withdrawal at power, the Power Range Neutron Flux-High Positive Rate trip must be OPERABLE. In MODE 3, 4, 5, or 6, the Power Range Neutron Flux-High Positive Rate trip Function does not have to be OPERABLE because other RTS trip Functions and administrative controls will provide protection against positive reactivity additions. In MODE 6, no rods are withdrawn and the SDM is increased during refueling operations. The reactor vessel head is also removed or the closure bolts are detensioned preventing any pressure buildup. In addition, the NIS power range channels cannot indicate neutron levels present in this mode.

Prairie Island Units 1 and 2

BASES .

B 3.3.1-14

APPLICABLE SAFETY ANALYSES, LCO, AND APPLICABILITY

- 3. <u>Power Range Neutron Flux Rate</u> (continued)
 - b. Power Range Neutron Flux-High Negative Rate

The Power Range Neutron Flux-High Negative Rate trip Function ensures that protection is provided for rod drop events. At high power levels, a rod drop event could cause local flux peaking that would result in an unconservative DNBR. Operation of this Function is not required for certain single rod drop events. Safety analysis results show that DNBR will be greater than the limit for those dropped rods that do not actuate this function.

The LCO requires all four Power Range Neutron Flux-High Negative Rate channels to be OPERABLE.

In MODE 1 or 2, when there is potential for a rod drop event to occur, the Power Range Neutron Flux-High Negative Rate trip must be OPERABLE. In MODE 3, 4, 5, or 6, the Power Range Neutron Flux-High Negative Rate trip Function does not have to be OPERABLE because the core is not critical and DNB is not a concern. In MODE 6, no rods are withdrawn and the required SDM is increased during refueling operations. In addition, the NIS power range channels cannot indicate neutron levels present in this MODE.

4. Intermediate Range Neutron Flux

The Intermediate Range Neutron Flux trip Function provides redundant protection to the Power Range Neutron Flux-Low Setpoint trip Function. The NIS intermediate range detectors are located external to the reactor vessel and measure neutrons leaking from the core. The NIS intermediate range detectors

Prairie Island Units 1 and 2

B 3.3.1-15

BASES		
APPLICABLE SAFETY	4.	Intermediate Range Neutron Flux (continued)
ANALYSES,		do not provide any input to control systems. Note that this
LCO, AND		Function also provides a signal to prevent automatic and
APPLICABILITY		manual rod withdrawal prior to initiating a reactor trip. Limiting further rod withdrawal may terminate the transient and
		eliminate the need to trip the reactor.
		The LCO requires two channels of Intermediate Range Neutron
		Flux to be OPERABLE. Two OPERABLE channels are
		sufficient to ensure no single random failure will disable this trip

Function.

Because this trip Function is important only during startup, there is generally no need to disable channels for testing while the Function is required to be OPERABLE. Therefore, a third channel is unnecessary.

In MODE 1 below the P-10 setpoint, and in MODE 2 above the P-6 setpoint, when there is a potential for an uncontrolled RCCA bank rod withdrawal event during reactor startup, the Intermediate Range Neutron Flux trip must be OPERABLE. Above the P-10 setpoint, the Power Range Neutron Flux-High Setpoint trip and the Power Range Neutron Flux-High Positive Rate trip provide core protection for a rod withdrawal event. In MODE 2 below the P-6 setpoint, and in MODE 3, 4, or 5, the Source Range Neutron Flux Trip provides the core protection for reactivity events. The core also has the required SDM to mitigate the consequences of a positive reactivity addition event. In MODE 6, all rods are fully inserted and the core has a required increased SDM. Also, the NIS intermediate range channels cannot indicate neutron levels present in this MODE.

Prairie Island Units 1 and 2

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B 3.3.1-16

APPLICABLE SAFETY ANALYSES, LCO, AND APPLICABILITY (continued)

5. Source Range Neutron Flux

The LCO requirement for the Source Range Neutron Flux trip Function ensures that protection is provided against a positive reactivity excursion from a subcritical condition. This trip Function provides redundant protection to the Power Range Neutron Flux-Low trip Function. The NIS source range detectors are located external to the reactor vessel and measure neutrons leaking from the core. The NIS source range detectors do not provide any inputs to control systems. The source range trip is the only RTS automatic protection function required in MODES 3, 4, and 5 when rods are capable of withdrawal or one or more rods are not fully inserted. Therefore, the functional capability at the specified trip setpoint is assumed to be available.

The Source Range Neutron Flux Function provides protection for control rod withdrawal from subcritical, boron dilution and control rod ejection events.

In MODE 2 when below the P-6 setpoint and in MODES 3, 4, and 5 when there is a potential for an uncontrolled RCCA bank rod withdrawal event the Source Range Neutron Flux trip must be OPERABLE. Two OPERABLE channels are sufficient to ensure no single random failure will disable this trip Function. Above the P-6 setpoint, the Intermediate Range Neutron Flux trip and the Power Range Neutron Flux-Low trip will provide core protection for reactivity events. Above the P-6 setpoint, the NIS source range detectors are de-energized.

In MODEs 3, 4, and 5 with all rods fully inserted and the Rod Control System not capable of rod withdrawal, and in MODE 6, the outputs from the Function to RTS logic are not required to be OPERABLE.

The requirements for the NIS source range detectors to monitor core neutron levels and provide indication of reactivity changes

Prairie Island Units 1 and 2

B 3.3.1-17

APPLICABLE 5. Source Range Neutron Flux (continued) SAFETY ANALYSES, 12CO, AND 43ddressed in LCO 3.9.3, "Nuclear Instrumentation," for MODE 6. 6. Overtemperature ΔT

The Overtemperature ΔT trip Function is provided to ensure that the design limit DNBR is met. The inputs to the Overtemperature ΔT trip include pressurizer pressure, coolant temperature, axial power distribution, and reactor power as indicated by loop ΔT assuming full reactor coolant flow. Protection from violating the DNBR limit is assured for those transients that are slow with respect to delays from the core to the measurement system. The Overtemperature ΔT trip Function uses each loop's ΔT as a measure of reactor power and is compared with a setpoint that is automatically varied with the following parameters:

- reactor coolant average temperature the trip setpoint is varied to correct for changes in coolant density and specific heat capacity with changes in coolant temperature;
- pressurizer pressure the trip setpoint is varied to correct for changes in system pressure; and
- axial power distribution f(∆I), the trip setpoint is varied to account for imbalances in the axial power distribution as detected by the NIS upper and lower power range channels. If axial peaks are greater than the design limit, as indicated by the difference between the upper and lower NIS power range channels, the trip setpoint is reduced in accordance with Note 1 of Table 3.3.1-1.

Prairie Island Units 1 and 2

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BASES

BASES		
APPLICABLE SAFETY	6.	<u>Overtemperature ΔT</u> (continued)
ANALYSES, LCO, AND APPLICABILITY		Dynamic compensation is included for system piping delays from the core to the temperature measurement system.
		The Overtemperature ΔT trip Function is calculated for each channel as described in Note 1 of Table 3.3.1-1. A trip occurs if Overtemperature ΔT is indicated in two channels. Since the

Overtemperature ΔT is indicated in two channels. Since the pressure and temperature signals are used for other control functions, the actuation logic must be able to withstand an input failure to the control system, which may then require the protection function actuation, and a single failure in the other channels providing the protection function actuation. Note that this Function also provides a signal to generate a turbine runback prior to reaching the trip setpoint. A turbine runback will reduce turbine power and reactor power. A reduction in power will normally alleviate the Overtemperature ΔT condition and may prevent a reactor trip.

The LCO requires all four channels of the Overtemperature ΔT trip Function to be OPERABLE. Note that the Overtemperature ΔT Function receives input from channels shared with other RTS Functions. Failures that affect multiple Functions require entry into the Conditions applicable to all affected Functions.

In MODE 1 or 2, the Overtemperature ΔT trip must be OPERABLE to prevent DNB. In MODE 3, 4, 5, or 6, this trip Function does not have to be OPERABLE because the reactor is not operating and there is insufficient heat production to be concerned about DNB.

Prairie Island Units 1 and 2

B 3.3.1-19

APPLICABLE SAFETY ANALYSES, LCO, AND APPLICABILITY (continued)

7. Overpower ΔT

The Overpower ΔT trip Function ensures that protection is provided to ensure the integrity of the fuel (i.e., no fuel pellet melting and less than 1% cladding strain) under all possible overpower conditions. This trip Function also provides a backup to the Power Range Neutron Flux-High Setpoint trip. The Overpower ΔT trip Function ensures that the allowable heat generation rate (kW/ft) of the fuel is not exceeded. It uses the ΔT of each loop as a measure of reactor power with a setpoint that is automatically varied with the following parameters:

 reactor coolant average temperature — the trip setpoint is varied to correct for changes in coolant density and specific heat capacity with changes in coolant temperature;

 rate of change of reactor coolant average temperature including dynamic compensation for the delays between the core and the temperature measurement system; and

axial power distribution — $f(\Delta I)$, the trip setpoint is varied to account for imbalances in the axial power distribution as detected by the NIS upper and lower power range detectors. If axial peaks are greater than the design limit, as indicated by the difference between the upper and lower NIS power range detectors, the trip setpoint is reduced in accordance with Note 2 of Table 3.3.1-1.

The Overpower ΔT trip Function is calculated for each channel as per Note 2 of Table 3.3.1-1. A trip occurs if Overpower ΔT is indicated in two channels. Since the temperature signals are used for other control functions, the actuation logic must be

Prairie Island Units 1 and 2

B 3.3.1-20

APPLICABLE	7.	<u>Overpower ΔT</u> (continued)
SAFETY ANALYSES, LCO, AND APPLICABILITY		able to withstand an input failure to the control system, which may then require the protection function actuation and a single failure in the remaining channels providing the protection function actuation. Note that this Function also provides a signal to generate a turbine runback prior to reaching the Allowable Value. A turbine runback will reduce turbine power and reactor power. A reduction in power will normally alleviate the Overpower ΔT condition and may prevent a reactor trip.
		The LCO requires four channels of the Overpower ΔT trip Function to be OPERABLE. Note that the Overpower ΔT trip Function receives input from channels shared with other RTS Functions. Failures that affect multiple Functions require entry into the Conditions applicable to all affected Functions.
		In MODE 1 or 2, the Overpower ΔT trip Function must be OPERABLE. These are the only times that enough heat is generated in the fuel to be concerned about the heat generation rates and overheating of the fuel. In MODE 3, 4, 5, or 6, this trip Function does not have to be OPERABLE because the reactor is not operating and there is insufficient heat production to be concerned about fuel overheating and fuel damage.
	8.	Pressurizer Pressure
		The same sensors provide input to the Pressurizer Pressure- High and-Low trips and the Overtemperature ΔT trip.
		a. <u>Pressurizer Pressure-Low</u> The Pressurizer Pressure Low trip Eurotion oncures that
		The Pressurizer Pressure-Low trip Function ensures that protection is provided against violating the DNBR limit du to low pressure.

Prairie Island Units 1 and 2

B 3.3.1-21

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APPLICABLE SAFETY ANALYSES, LCO, AND APPLICABILITY

a. Pressurizer Pressure-Low (continued)

The LCO requires four channels of Pressurizer Pressure -Low to be OPERABLE. Since the pressurizer pressure channels are also used to provide input to the pressurizer pressure control system, the actuation logic must be able to withstand an input failure to the control system, which may then require the protection function actuation, and a single failure in the other channels providing the protection function actuation.

In MODE 1, when DNB is a major concern, the Pressurizer Pressure-Low trip must be OPERABLE. This trip Function is automatically enabled on increasing power by the P-7 interlock (NIS power range or turbine impulse pressure). On decreasing power, this trip Function is automatically blocked below P-7. Below the P-7 setpoint, the AOO's meet their DNB criteria without requiring this trip function.

b. Pressurizer Pressure-High

The Pressurizer Pressure-High trip Function ensures that protection is provided against overpressurizing the RCS. This trip Function operates in conjunction with the pressurizer relief and safety valves to prevent RCS overpressure conditions.

The LCO requires three channels of the Pressurizer Pressure-High to be OPERABLE. Although the pressurizer pressure channels are also input to pressure control, an input failure to the control system can not cause a transient that would require actuation of this protection function. Three OPERABLE channels are sufficient to ensure no single random failure will disable this trip Function.

Prairie Island Units 1 and 2

B 3.3.1-22

APPLICABLE SAFETY ANALYSES, LCO, AND APPLICABILITY

b. Pressurizer Pressure-High (continued)

The Pressurizer Pressure-High Allowable Value is selected to be below the pressurizer safety valve actuation pressure and above the power operated relief valve (PORV) setting. This setting minimizes challenges to safety valves while avoiding unnecessary reactor trip for those pressure increases that can be controlled by the PORVs.

In MODE 1 or 2, the Pressurizer Pressure-High trip must be OPERABLE to help prevent RCS overpressurization and minimize challenges to the relief and safety valves. In MODE 3, 4, 5, or 6, the Pressurizer Pressure-High trip Function does not have to be OPERABLE because transients that could cause an overpressure condition will be slow to occur. Therefore, the operator will have sufficient time to evaluate unit conditions and take corrective actions. Additionally, low temperature overpressure protection systems provide overpressure protection when below MODE 4.

9. Pressurizer Water Level-High

The Pressurizer Water Level-High trip Function provides a backup signal for the Pressurizer Pressure-High trip and also provides protection against water relief through the pressurizer safety valves. These valves are designed to pass steam in order to achieve their design energy removal rate. A reactor trip is actuated prior to the pressurizer becoming water solid. The LCO requires three channels of Pressurizer Water Level-High to be OPERABLE. The pressurizer level channels are used as input to the Pressurizer Level Control System. The level channels do not actuate the safety valves, and the high pressure reactor trip is set below the safety valve setting. Therefore, with the slow rate of charging available, pressure overshoot due to

Prairie Island Units 1 and 2

B 3.3.1-23

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APPLICABLE	9.	Pressurizer Water Level-High (continued)
SAFETY ANALYSES, LCO, AND		level channel failure cannot cause the safety valve to lift before the reactor high pressure trip.
APPLICABILITY		In MODE 1, when there is a potential for transients such as a load rejection causing overfill of the pressurizer, the Pressurize Water Level-High trip must be OPERABLE. This trip Function is automatically enabled on increasing power by the P-7 interlock. On decreasing power, this trip Function is automatically blocked below P-7. Below the P-7 setpoint, transients that could raise the pressurizer water level will be slow and the operator will have sufficient time to evaluate unit conditions and take corrective actions.
	10.	Reactor Coolant Flow-Low
		The Reactor Coolant Flow-Low trip Function ensures that protection is provided against violating the DNBR limit due to low flow in one or more RCS loops, while avoiding reactor tri due to normal variations in loop flow. Above the P-8 setpoint loss of flow in either RCS loop will actuate a reactor trip. Above the P-7 setpoint, a loss of flow in both RCS loops will actuate a reactor trip. Each RCS loop has three flow detectors monitor flow. The flow signals are not used for any control system input.
		The LCO requires three Reactor Coolant Flow-Low channels per loop to be OPERABLE in MODE 1 above P-7 or P-8.
		In MODE 1 above the P-7 or P-8 setpoints, a loss of flow in an RCS loop could result in DNB conditions in the core. Below the P-7 and P-8 setpoints, all reactor trips on low flow are automatically blocked since there is insufficient heat production to generate DNB conditions.
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Prairie Island Units 1 and 2

B 3.3.1-24

APPLICABLE SAFETY ANALYSES, LCO, AND APPLICABILITY (continued)

11. Loss of Reactor Coolant Pump (RCP)

Loss of RCP trip Function operates on two sets of auxiliary contacts, with one set on each RCP breaker. This Function anticipates the Reactor Coolant Flow-Low trips to avoid RCS heatup that would occur before the low flow trip actuates.

a. Reactor Coolant Pump Breaker Open

The RCP Breaker Open trip Function provides protection against violating the DNBR limit due to a loss of flow in one or both RCS loop(s). The position of each RCP breaker is monitored. If one RCP breaker is open above the P-8 setpoint, a reactor trip is initiated. If both RCP breakers are open above the P-7 setpoint, a reactor trip is initiated. This trip Function will generate a reactor trip before the Reactor Coolant Flow-Low trip setpoint is reached.

The LCO requires one RCP Breaker Open channel per RCP to be OPERABLE. One OPERABLE channel is sufficient for this trip Function because the RCS Flow- Low trip alone provides sufficient protection of the DNBR limit for loss of flow events. The RCP Breaker Open trip serves only to anticipate the low flow trip, minimizing the thermal transient associated with loss of a pump.

This Function measures only the discrete position (open or closed) of the RCP breaker, using position switches. Therefore, the Function has no adjustable trip setpoint with which to associate an Allowable Value.

Below the P-7 and P-8 setpoints, RCP Breaker Open reactor trips are automatically blocked since the AOOs meet their DNB criteria without requiring this trip

Prairie Island Units 1 and 2

B 3.3.1-25

APPLICABLE
SAFETY
ANALYSES,
LCO, AND
APPLICABILITYa.Reactor Coolant Pump Breaker Open (continued)setpoints, this low power level.Above the P-7 or P-8
setpoints, the RCP Breaker Open reactor trips are
automatically enabled.b.Underfrequency Buses 11 and 12 (21 and 22)

The Underfrequency Buses 11 and 12 (21 and 22) breaker trip Function provides protection against violating the DNBR limit due to a loss of flow in both RCS loops from a major network frequency disturbance. An underfrequency condition will slow down the pumps, thereby reducing their coastdown time following a pump trip. The proper coastdown time is required so that reactor heat can be removed immediately after reactor trip. The frequency of each RCP bus is monitored. A loss of frequency detected on both RCP buses will initiate a trip of both RCP breakers. This trip will generate a reactor trip before the Reactor Coolant Flow-Low trip setpoint is reached. Time delays are incorporated into the Underfrequency Buses 11 and 12 (21 and 22) channels to prevent RCP breaker trips due to momentary electrical power transients.

The LCO requires two underfrequency channels per bus to be OPERABLE.

In MODE 1 above the P-7 or P-8 setpoints, the Underfrequency Buses 11 and 12 (21 and 22) trip Function must be OPERABLE. Below the P-7 and P-8 setpoints, reactor trips on RCP breaker open are automatically blocked since the AOO's meet their DNB criteria without requiring this trip function at this low power level. Above the P-7 or P-8 setpoints, the reactor trips on RCP breaker open are automatically enabled.

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APPLICABLE	12. Undervoltage on Buses 11 and 12 (21 and 22)
SAFETY ANALYSES, LCO, AND APPLICABILITY (continued)	The Undervoltage on Buses 11 and 12 (21 and 22)Function provides protection against violating the DNBR limit due to a loss of flow in both RCS loops. The voltage to each RCP is monitored. Above the P-7 setpoint, a loss of voltage detected on both RCP buses will initiate a reactor trip. This trip Function will generate a reactor trip before the Reactor Coolant Flow- Low trip setpoint is reached. Time delays are incorporated into the undervoltage channels to prevent reactor trips due to momentary electrical power transients.
	The LCO requires two undervoltage channels per bus to be OPERABLE.
	In MODE 1 above the P-7 setpoint, the undervoltage trip must be OPERABLE. Below the P-7 setpoint, reactor trips on undervoltage are automatically blocked since the AOOs meet their DNB criteria without requiring this trip function at this low power level. Above the P-7 setpoint, the reactor trip on undervoltage in both RCS loops is automatically enabled. This Function uses the same relays as the ESFAS Function 6.d, "Undervoltage on Buses 11 and 12 (21 and 22)" start of the turbine driven auxiliary feedwater pump.
	13. <u>Steam Generator (SG) Water Level-Low Low</u> The SG Water Level-Low Low trip Function ensures that protection is provided against a loss of heat sink and actuates th Auxiliary Feedwater (AFW) System prior to uncovering the SG tubes. The SGs are the heat sink for the reactor. In order to act as a heat sink, the SGs must contain a minimum amount of water. A narrow range low low level in either SG indicates a potential loss of heat sink for the reactor. This Function also performs the ESFAS function of starting the AFW pumps on low low SG level.

Prairie Island Units 1 and 2

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APPLICABLE SAFETY	13. Steam Generator (SG) Water Level-Low Low (continued)
ANALYSES,	The LCO requires three channels of SG Water Level-Low
LCO, AND APPLICABILITY	Low per SG to be OPERABLE. The level channels provide input to the SG level control system. However, median signal selection ensures that the failure of a single channel will not
	result in a low level which may require the protection function actuation. Therefore, only three channels per SG are required to be OPERABLE.
	In MODE 1 or 2, when the reactor requires a heat sink, the SG Water Level-Low Low trip must be OPERABLE. The normal source of water for the SGs is the Main Feedwater (MFW)
	System (not safety related). Generally the MFW System is only in operation in MODE 1 or 2. The AFW System is the safety related backup source of water to ensure that the SGs remain the
	heat sink for the reactor. During normal startups and
	shutdowns, the AFW System provides feedwater to maintain SG level. In MODE 3, 4, 5, or 6, the SG Water Level-Low Low
	Function does not have to be OPERABLE because the reactor is not operating or even critical Decay heat removal is

not operating or even critical. Decay heat removal is accomplished by the AFW System or by the Residual Heat Removal (RHR) System in MODE 3, 4, 5, or 6.

14. <u>Turbine Trip</u>

a. Turbine Trip-Low Autostop Oil Pressure

The Turbine Trip-Low Autostop Oil Pressure trip Function anticipates the loss of heat removal capabilities of the secondary system following a turbine trip. This trip Function acts to minimize the pressure/temperature transient on the reactor. Any turbine trip from a power level below the P-9 setpoint will not actuate a reactor trip. Three pressure switches monitor the autostop oil pressure in the turbine electrohydraulic control system. A low pressure

Prairie Island Units 1 and 2

BASES

B 3.3.1-28

APPLICABLE SAFETY ANALYSES, LCO, AND APPLICABILITY

a. <u>Turbine Trip-Low Autostop Oil Pressure</u> (continued)

condition sensed by two-out-of-three pressure switches will actuate a reactor trip. These pressure switches do not provide any input to the control system. The unit is designed to withstand a complete loss of load and not sustain core damage or challenge the RCS pressure limitations. Core protection is provided by the Pressurizer Pressure-High trip Function and RCS integrity is ensured by the pressurizer safety valves.

The LCO requires three channels of Turbine Trip-Low Autostop Oil Pressure to be OPERABLE in MODE 1 above P-9.

Below the P-9 setpoint, heat removal can be accommodated by the steam dump system. In MODE 2, 3, 4, 5, or 6, there is no potential for a turbine trip, and the Turbine Trip - Low Autostop Oil Pressure trip Function does not need to be OPERABLE.

b. Turbine Trip - Turbine Stop Valve Closure

The Turbine Trip-Turbine Stop Valve Closure trip Function anticipates the loss of heat removal capabilities of the secondary system following a turbine trip from a power level above the P-9 setpoint. The trip Function anticipates the loss of secondary heat removal capability that occurs when the stop valves close. Tripping the reactor in anticipation of loss of secondary heat removal acts to minimize the pressure and temperature transient on the reactor. This trip Function will not and is not required to operate in the presence of a single channel failure. The unit is designed to withstand a complete loss of load and not sustain core damage or challenge the RCS pressure limitations. Core protection is provided by the Pressurizer Pressure-High trip Function, and RCS integrity is ensured

Prairie Island Units 1 and 2

B 3.3.1-29

APPLICABLE SAFETY ANALYSES, LCO, AND APPLICABILITY b. Turbine Trip - Turbine Stop Valve Closure (continued)

by the pressurizer safety valves. This trip Function is diverse to the Turbine Trip-Low Autostop Oil Pressure trip Function. Each turbine stop valve is equipped with one limit switch channel that inputs to the RTS relay logic. If the limit switches indicate that both stop valves are closed, a reactor trip is initiated.

The LCO requires two Turbine Trip-Turbine Stop Valve Closure channels, one per valve, to be OPERABLE in MODE 1 above P-9. Both channels to a train of relay logic must trip to cause reactor trip.

Below the P-9 setpoint, heat removal can be accommodated by the steam dump system. In MODE 2, 3, 4, 5, or 6, there is no potential for a load rejection, and the Turbine Trip-Stop Valve Closure trip Function does not need to be OPERABLE.

15. <u>Safety Injection (SI) Input from Engineered Safety Feature</u> Actuation System

The SI Input from ESFAS ensures that if a reactor trip has not already been generated by the RTS, the ESFAS automatic actuation relay logic will initiate a reactor trip upon any signal that initiates SI. This is not a condition of acceptability for the LOCA. However, other transients and accidents take credit for varying levels of ESF performance and rely upon rod insertion, except for the most reactive rod that is assumed to be fully withdrawn, to ensure reactor shutdown. Therefore, a reactor trip is initiated every time an SI signal is present. Allowable Values are not applicable to this Function. The SI Input is provided by relays in the ESFAS. Therefore, there is no measurement signal with which to associate an Allowable Value.

Prairie Island Units 1 and 2

B 3.3.1-30

	<u> </u>	
APPLICABLE SAFETY ANALYSES,		afety Injection (SI) Input from Engineered Safety eature Actuation System (continued)
LCO, AND APPLICABILITY		he LCO requires two trains of SI Input from ESFAS to be PERABLE in MODE 1 or 2.
	ר ס פ כ	A reactor trip is initiated every time an SI signal is present. Therefore, this trip Function must be OPERABLE in MODE 1 or 2, when the reactor is critical, and must be shut down in the event of an accident. In MODE 3, 4, 5, or 6, the reactor is not critical, and this trip Function does not need to be OPERABLE.
	16. <u>R</u> e	eactor Trip System Interlocks
	are ba are an	eactor protection interlocks are provided to ensure reactor trip e in the correct configuration for the current unit status. They ck up operator actions to ensure protection system Functions e not bypassed during unit conditions under which the safety alysis assumes the Functions are not bypassed. ach interlock Function consists of the following circuitry: The bistables that provide the applicable process parameter
		input;
	•	Logic input relays and contact matrix; and
	•	Permissive (P) relays that provide the interlock to the appropriate trip logic.

Units 1 and 2

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RTS Instrumentation B 3.3.1

Prairie Island Units 1 and 2	B 3.3.1-32	12/11/00
	Neutron Flux, P-6 interlock to be OF when below the P-6 interlock setpoin	
	The LCO requires two channels of In	ntermediate Range
	 on decreasing power, the P-6 int energizes the NIS source range the NIS Source Range Neutron I 	detectors and enables
		·
	the source range. When the sou blocked, the high voltage to the removed; and	
	source range trip and allows the the intermediate range is OPER.	
	 on increasing power, the P-6 into manual block of the NIS Source reactor trip. This prevents a pre 	Range, Neutron Flux
		and a strallow of the
	requirement for the P-6 interlock ens Functions are performed:	
	reading. If both channels drop below permissive will automatically be def	
	actuated when any NIS intermediate approximately one decade above the	
	The Intermediate Range Neutron Flu	
APPLICABILITY	a. Intermediate Range Neutron Flux, P	-6
ANALYSES, LCO, AND	The interlock Functions are:	
SAFETY	16. Reactor Trip System Interlocks (continu	
APPLICABLE	ID REACION THE SUSTEM INTERLOCKS TCONTINU	ens

BASES		
APPLICABLE SAFETY ANALYSES, LCO, AND APPLICABILITY	a.	Intermediate Range Neutron Flux, P-6 (continued) Above the P-6 interlock setpoint, the NIS Source Range Neutron Flux reactor trip will be blocked, and this Function will no longer be necessary. In MODE 3, 4, 5, or 6, the P-6 interlock does not have to be OPERABLE because the NIS Source Range is providing core protection.
	b.	Low Power Reactor Trips Block, P-7
· · ·		The Low Power Reactor Trips Block, P-7 interlock is actuated by input from either Power Range Neutron Flux or Turbine Impulse Pressure. The LCO requirement for the P-7 interlock ensures that the following Functions are performed:
		(1) on increasing power, the P-7 interlock automatically enables reactor trips on the following Functions:
		• Pressurizer Pressure-Low;
		• Pressurizer Water Level-High;
		• Reactor Coolant Flow-Low (both loops);
		• RCPs Breaker Open (both loops); and
		• Undervoltage Buses 11 and 12 (21 and 22).

These reactor trips are only required when operating above the P-7 setpoint. The reactor trips provide protection against violating the DNBR limit. Below the P-7 setpoint, the RCS is capable of providing sufficient natural circulation without any RCP running.

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BASES

APPLICABLE SAFETY ANALYSES, LCO, AND APPLICABILITY

- b. Low Power Reactor Trips Block, P-7 (continued)
 - (2) on decreasing power, the P-7 interlock automatically blocks reactor trips on the following Functions:
 - Pressurizer Pressure-Low;
 - Pressurizer Water Level-High;
 - Reactor Coolant Flow-Low (both loops);
 - RCP Breaker Position (both loops); and
 - Undervoltage Buses 11 and 12 (21 and 22).

The associated trips are blocked below the P-7 setpoint and unblocked above the P-7 setpoint. In MODE 2, 3, 4, 5, or 6, this Function does not have to be OPERABLE because the interlock performs its Function when power level drops below the P-7 setpoint, which is in MODE 1.

1. Power Range Neutron Flux, P-7

Power Range Neutron Flux, P-7 is actuated by two-outof-four NIS power range channels. The LCO requirement for this Function ensures that this input to the P-7 interlock is available.

The LCO requires four channels of Power Range Neutron Flux, P-7 to be OPERABLE in MODE 1.

OPERABILITY in MODE 1 ensures the Function is available to perform its increasing power Functions.

Prairie Island Units 1 and 2

B 3.3.1-34

APPLICABLE SAFETY ANALYSES, LCO, AND APPLICABILITY (continued)

2. Turbine Impulse Pressure, P-7

The Turbine Impulse Pressure, P-7 is actuated by one-out-of-two pressure channels. The LCO requirement for this Function ensures that this input to the P-7 interlock is available.

The LCO requires two channels of Turbine Impulse Pressure, P-7 to be OPERABLE in MODE 1. The interlock Function is not required OPERABLE in MODE 2, 3, 4, 5, or 6 because the turbine generator is not operating.

c. Power Range Neutron Flux, P-8

The Power Range Neutron Flux, P-8 interlock is actuated by two-out-of-four NIS power range channels. The P-8 interlock automatically enables the Reactor Coolant Flow-Low (single loop) and RCP Breaker open (single loop) reactor trips on low flow in one or more RCS loops on increasing power. The LCO requirement for this trip Function ensures that protection is provided against a loss of flow in any RCS loop that could result in DNB conditions in the core when greater than the P-8 setpoint. On decreasing power, the reactor trip on low flow in any loop is automatically blocked.

The LCO requires four channels of Power Range Neutron Flux, P-8 interlock to be OPERABLE in MODE 1.

In MODE 1, a loss of flow in one RCS loop could result in DNB conditions, so the Power Range Neutron Flux, P-8 interlock must be OPERABLE. In MODE 2, 3, 4, 5, or 6, this Function does not have to be OPERABLE because the core is not producing sufficient power to be concerned about DNB conditions.

Prairie Island Units 1 and 2

B 3.3.1-35

APPLICABLE SAFETY ANALYSES, LCO, AND APPLICABILITY (continued)

d. Power Range Neutron Flux, P-9

The Power Range Neutron Flux, P-9 interlock is actuated by two-out-of-four NIS power range channels. The LCO requirement for this Function ensures that the Turbine Trip-Low Autostop Oil Pressure and Turbine Trip-Turbine Stop Valve Closure reactor trips are enabled above the P-9 setpoint. Above the P-9 setpoint, a turbine trip could cause a load rejection beyond the capacity of the steam dump and Rod Control Systems. A reactor trip is automatically initiated on a turbine trip when it is above the P-9 setpoint, to minimize the transient on the reactor.

The LCO requires four channels of Power Range Neutron Flux, P-9 interlock to be OPERABLE in MODE 1.

In MODE 1, a turbine trip could cause a load rejection beyond the capacity of the steam dump and Rod Control Systems, so the Power Range Neutron Flux interlock must be OPERABLE. In MODE 2, 3, 4, 5, or 6, this Function does not have to be OPERABLE because the reactor is not at a power level sufficient to have a load rejection beyond the capacity of the steam dump system.

e. Power Range Neutron Flux, P-10

The Power Range Neutron Flux, P-10 interlock is actuated by two-out-of-four NIS power range channels. If power level falls below the setpoint on 3 of 4 channels, the nuclear instrument trips will be automatically unblocked. The LCO requirement for the P-10 interlock ensures that the following Functions are performed:

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B 3.3.1-36

APPLICABLE SAFETY ANALYSES, LCO, AND APPLICABILITY

- e. Power Range Neutron Flux, P-10 (continued)
 - on increasing power, the P-10 interlock allows the operator to manually block the Intermediate Range Neutron Flux reactor trip. Note that blocking the reactor trip also blocks the signal to prevent automatic and manual rod withdrawal;
 - on increasing power, the P-10 interlock allows the operator to manually block the Power Range Neutron Flux-Low reactor trip;

• on increasing power, the P-10 interlock automatically provides a backup signal to block the Source Range Neutron Flux reactor trip, and also to de-energize the NIS source range detectors; and

• on decreasing power, the P-10 interlock automatically enables the Power Range Neutron Flux-Low reactor trip and the Intermediate Range Neutron Flux reactor trip (and rod stop).

The LCO requires four channels of Power Range Neutron Flux, P-10 interlock to be OPERABLE in MODE 1 or 2. OPERABILITY in MODE 1 ensures the Function is available to perform its decreasing power Functions in the event of a reactor shutdown. This Function must be OPERABLE in MODE 2 to ensure that core protection is provided during a startup or shutdown by the Power Range Neutron Flux-Low and Intermediate Range Neutron Flux reactor trips. In MODE 3, 4, 5, or 6, this Function does not have to be OPERABLE because the reactor is not at power and the Source Range Neutron Flux reactor trip provides core protection.

Prairie Island Units 1 and 2

B 3.3.1-37

APPLICABLE SAFETY ANALYSES, LCO, AND APPLICABILITY (continued)

17. Reactor Trip Breakers

The LCO requires two OPERABLE trains of trip breakers. A trip breaker train consists of all trip breakers associated with a single RTS logic train that are racked in, closed, and capable of supplying power to the Rod Control System. Thus, the train may consist of the main breaker, bypass breaker, or main breaker and bypass breaker, depending upon the system configuration. Two OPERABLE trains ensure no single random failure can disable the RTS trip capability. The OPERABILITY requirement for the individual trip mechanisms is provided in the Function 18 below.

This trip Function must be OPERABLE in MODE 1 or 2. This ensures it is available when the reactor is critical. In MODE 3, 4, or 5, this RTS trip Function must be OPERABLE when the Rod Control System is capable of rod withdrawal or one or more rods are not fully inserted.

18. Reactor Trip Breaker Undervoltage and Shunt Trip Mechanisms

The LCO requires both the Undervoltage and Shunt Trip Mechanisms to be OPERABLE for each RTB that is in service. The trip mechanisms are not required to be OPERABLE for trip breakers that are open, racked out, incapable of supplying power to the Rod Control System, or declared inoperable under Function 17 above. OPERABILITY of both trip mechanisms on each breaker ensures that no single trip mechanism failure will prevent opening any breaker on a valid signal.

These trip Functions must be OPERABLE in MODE 1 or 2. This ensures they are available when the reactor is critical. In MODE 3, 4, or 5, these RTS trip Functions must be OPERABLE when the Rod Control System is capable of rod withdrawal or one or more rods are not fully inserted.

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B 3.3.1-38

APPLICABLE SAFETY ANALYSES, LCO, AND APPLICABILITY (continued)

19. Automatic Trip Logic

The LCO requirement for the RTBs (Functions 17 and 18) and Automatic Trip Logic (Function 19) ensures that means are provided to interrupt the power to allow the rods to fall into the reactor core. Each RTB is equipped with an undervoltage coil and a shunt trip coil to trip the breaker open when needed. Each RTB is equipped with a bypass breaker to allow testing of the trip breaker while the unit is at power. The reactor trip signals generated by the RTS Automatic Trip Logic cause the RTBs and associated bypass breakers to open and shut down the reactor.

The LCO requires two trains of RTS Automatic Trip Logic to be OPERABLE. Having two OPERABLE trains ensures that random failure of a single logic train will not prevent reactor trip.

This trip Function must be OPERABLE in MODE 1 or 2. This ensures it is available when the reactor is critical. In MODE 3, 4, or 5, this RTS trip Function must be OPERABLE when the Rod Control System is capable of rod withdrawal or one or more rods not fully inserted.

The RTS instrumentation satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii).

ACTIONS

A Note has been added to the ACTIONS to clarify the application of Completion Time rules. The Conditions of this Specification may be entered independently for each Function listed in Table 3.3.1-1.

In the event a channel's trip setpoint is found nonconservative with respect to the Allowable Value, or the transmitter, instrument loop, or bistable is found inoperable, then all affected Functions provided by that channel must be declared inoperable and the LCO

Prairie Island Units 1 and 2

B 3.3.1-39

ACTIONS (continued)

Condition(s) entered for the protection Function(s) affected. When the Required Channels in Table 3.3.1-1 are specified (e.g., on a per steamline, per loop, per SG, etc., basis), then the Condition may be entered separately for each steamline, loop, SG, etc., as applicable.

When the number of inoperable channels in a trip Function exceed those specified in one or other related Conditions associated with a trip Function, then the unit may be outside the safety analysis. Therefore, LCO 3.0.3 must be immediately entered if applicable in the current MODE of operation.

<u>A.1</u>

Condition A applies to all RTS protection Functions. Condition A addresses the situation where one or more required channels or trains for one or more Functions are inoperable at the same time. The Required Action is to refer to Table 3.3.1-1 and to take the Required Actions for the protection functions affected. The Completion Times are those from the referenced Conditions and Required Actions.

B.1 and B.2.

Condition B applies to the Manual Reactor Trip in MODE 1 or 2. This action addresses the train orientation of the Reactor Protection Relay Logic for this Function. With one channel inoperable, the inoperable channel must be restored to OPERABLE status within 48 hours. In this Condition, the remaining OPERABLE channel is adequate to perform the safety function.

The Completion Time of 48 hours is reasonable considering that there are two automatic actuation trains and another manual initiation channel OPERABLE, and the low probability of an event occurring during this interval.

Prairie Island Units 1 and 2

B 3.3.1-40

ACTIONS B.1 and B.2. (continued)

If the channel cannot be restored to OPERABLE status within the allowed 48 hour Completion Time, the unit must be brought to a MODE in which the requirement does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 additional hours (54 hours total time). The 6 additional hours to reach MODE 3 is reasonable, based on operating experience, to reach MODE 3 from full power operation in an orderly manner and without challenging unit systems. With the unit in MODE 3, Action C would apply to any inoperable Manual Reactor Trip Function if the Rod Control System is capable of rod withdrawal or one or more rods are not fully inserted.

C.1, C.2.1 and C.2.2

Condition C applies to the following reactor trip Functions in MODE 3, 4, or 5 with the Rod Control System capable of rod withdrawal or one or more rods not fully inserted:

- Manual Reactor Trip;
- RTBs;
- RTB Undervoltage and Shunt Trip Mechanisms; and
- Automatic Trip Logic.

This action addresses the train orientation of the RTS for these Functions. With one channel or train inoperable, the inoperable channel or train must be restored to OPERABLE status within 48 hours. If the affected Function(s) cannot be restored to OPERABLE status within the allowed 48 hour Completion Time, the unit must be placed in a MODE in which the requirement does not apply. To achieve this status, action must be initiated within the

Prairie Island Units 1 and 2

B 3.3.1-41

ACTIONS

C.1, C.2.1 and C.2.2 (continued)

same 48 hours to ensure that all rods are fully inserted and the Rod Control System must be placed in a condition incapable of rod withdrawal within the next hour. The additional hour provides sufficient time to accomplish the action in an orderly manner. With rods fully inserted and the Rod Control System incapable of rod withdrawal, these Functions are no longer required.

The Completion Time is reasonable considering that in this Condition, the remaining OPERABLE train is adequate to perform the safety function, and given the low probability of an event occurring during this interval.

D.1.1, D.1.2, and D.2

Condition D applies to the Power Range Neutron Flux -High Function.

The NIS power range detectors provide input to the reactor control system and, therefore, have a two-out-of-four trip logic. A known inoperable channel must be placed in the tripped condition. This results in a partial trip condition requiring only one-out-of-three logic for actuation. The 6 hours allowed to place the inoperable channel in the tripped condition is justified in WCAP-10271-P-A (Ref. 6).

In addition to placing the inoperable channel in the tripped condition, monitor the QPTR once every 12 hours as per SR 3.2.4.2, QPTR verification. Calculating QPTR every 12 hours compensates for the lost monitoring capability due to the inoperable NIS power range channel and allows continued unit operation at power levels > 85% RTP. The 12 hour Frequency is consistent with LCO 3.2.4, "QUADRANT POWER TILT RATIO (QPTR)."

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B 3.3.1-42

ACTIONS

$\underline{D.1.1}, \underline{D.1.2}, \text{ and } \underline{D.2}$ (continued)

As an alternative to the above Actions, the plant must be placed in a MODE where this Function is no longer required OPERABLE. Twelve hours are allowed to place the plant in MODE 3. This is a reasonable time, based on operating experience, to reach MODE 3 from full power in an orderly manner and without challenging plant systems. If Required Actions cannot be completed within their allowed Completion Times, LCO 3.0.3 must be entered.

The Required Actions have been modified by two Notes. Note 1 allows placing the inoperable channel in the bypass condition for up to 4 hours while performing routine surveillance testing of other channels. This Note also allows placing the inoperable channel in the bypass condition to allow setpoint adjustments of other channels when required to reduce the setpoint in accordance with other Technical Specifications. The 4 hour time limit is justified in Reference 6. Note 2 allows an additional power range instrument channel to be made inoperable only during low power PHYSICS TESTS.

Required Action D.1.2 has been modified by a Note which only requires SR 3.2.4.2 to be performed if THERMAL POWER is > 85% RTP and the Power Range Neutron Flux input to QPTR becomes inoperable. Failure of a component in the Power Range Neutron Flux Channel which renders the High Flux Trip Function inoperable may not affect the capability to monitor QPTR. As such, determining QPTR using the movable incore detectors once per 12 hours may not be necessary.

E.1 and E.2

Condition E applies to the following reactor trip Functions:

Power Range Neutron Flux-Low;

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B 3.3.1-43

BASES	
ACTIONS	E.1 and E.2 (continued)
	• Power Range Neutron Flux-High Positive Rate;
	• Power Range Neutron Flux-High Negative Rate;
	• Overtemperature ∆T;
	 Overpower ∆T;
	• Pressurizer Pressure-High; and
	• SG Water Level-Low Low.
	A known inoperable channel must be placed in the tripped condition within 6 hours. Placing the channel in the tripped condition results in a partial trip condition requiring only one-out-of-two logic for actuation of the two-out-of-three trips and one-out-of-three logic for actuation of the two-out-of-four trips. The 6 hours allowed to place the inoperable channel in the tripped condition is justified in Reference 6. If the operable channel cannot be placed in the trip condition within the specified Completion Time, the unit must be placed in a MODE where these Functions are not required OPERABLE. An additional 6 hours is allowed to place the unit in MODE 3. Six hours is a
	reasonable time, based on operating experience, to place the unit in MODE 3 from full power in an orderly manner and without challenging unit systems.
	The Required Actions have been modified by two Notes. Note 1 allows placing the inoperable channel in the bypassed condition for up to 4 hours while performing routine surveillance testing of the other channels. The 4 hour time limit is justified in Reference 6. Note 2 allows an additional power range instrument channel to be made inoperable only for low power PHYSICS TESTS.
· · · · · ·	
Prairie Island	

Prairie Island Units 1 and 2

B 3.3.1-44

ACTIONS (continued)

F.1 and F.2

Condition F applies to the Intermediate Range Neutron Flux trip when one channel is inoperable. Above the P-6 setpoint and below the P-10 setpoint, the NIS intermediate range channel performs the monitoring Functions. If THERMAL POWER is greater than the P-6 setpoint but less than the P-10 setpoint, 24 hours is allowed to reduce THERMAL POWER below the P-6 setpoint or increase THERMAL POWER above the P-10 setpoint. The provisions of LCO 3.0.4 allows entry into a MODE or other specified condition in the Applicability as directed by the Required Actions. Therefore, a MODE change is permitted with one channel inoperable whenever Required Action F.2 is used. The NIS Intermediate Range Neutron Flux channels must be OPERABLE when the power level is above the capability of the source range, P-6, and below the capability of the power range, P-10. If THERMAL POWER is greater than the P-10 setpoint, the NIS power range channels perform the monitoring and protection functions and the intermediate range is not required. The Completion Times allow for a slow and controlled power adjustment above P-10 or below P-6 and take into account the redundant capability afforded by the redundant OPERABLE channel, and the low probability of its failure during this period. This action does not require the inoperable channel to be tripped because the Function uses one-out-of-two logic. Tripping one channel would trip the reactor. Thus, the Required Actions specified in this Condition are only applicable when channel failure does not result in reactor trip.

<u>G.1 and G.2</u>

Condition G applies to two inoperable Intermediate Range Neutron Flux trip channels. Required Actions specified in this Condition are only applicable when channel failures do not result in reactor trip. Above the P-6 setpoint and below the P-10 setpoint, the NIS intermediate range channel performs the monitoring Functions.

Prairie Island Units 1 and 2

B 3.3.1-45

ACTIONS

G.1 and G.2 (continued)

With no intermediate range channels OPERABLE, the Required Actions are to suspend operations involving positive reactivity additions immediately. This will preclude any power level increase since there are no OPERABLE Intermediate Range Neutron Flux channels. The operator must also reduce THERMAL POWER below the P-6 setpoint within two hours. Below P-6, the Source Range Neutron Flux channels will be able to monitor the core power level. The Completion Time of 2 hours will allow a controlled power reduction to less than the P-6 setpoint and takes into account the low probability of occurrence of an event during this period that may require the protection afforded by the NIS Intermediate Range Neutron Flux trip.

Required Action G.1 is modified by a Note to indicate that normal plant control operations that individually add limited reactivity (e. g., temperature or boron fluctuations associated with RCS inventory management or temperature control) are not precluded by this Action, provided they are accounted for in the calculated SDM.

H.1

Condition H applies to one inoperable Source Range Neutron Flux trip channel when in MODE 2, below the P-6 setpoint, and performing a reactor startup. With the unit in this Condition, below P-6, the NIS source range performs the monitoring and protection functions. With one of the two channels inoperable, operations involving positive reactivity additions shall be suspended immediately.

This will preclude any power escalation. With only one source range channel OPERABLE, core protection is reduced and any actions that add positive reactivity to the core must be suspended immediately.

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Prairie Island Units 1 and 2

ACTIONS

H.1 (continued)

Required Action H.1 is modified by a Note to indicate that normal plant control operations that individually add limited reactivity (e. g., temperature or boron fluctuations associated with RCS inventory management or temperature control) are not precluded by this Action, provided they are accounted for in the calculated SDM.

<u>I.1</u>

Condition I applies to two inoperable Source Range Neutron Flux trip channels when in MODE 2, below the P-6 setpoint, or in MODE 3, 4, or 5 with the Rod Control System capable of rod withdrawal or one or more rods not fully inserted. With the unit in this Condition, below P-6, the NIS source range performs the monitoring and protection functions. With both source range channels inoperable, the RTBs must be opened immediately. With the RTBs open, the core is in a more stable condition.

J.1 and J.2

Condition J applies to one inoperable source range channel in MODE 3, 4, or 5 with the Rod Control System capable of rod withdrawal or one or more rods not fully inserted. With the unit in this Condition, below P-6, the NIS source range performs the monitoring and protection functions. With one of the source range channels inoperable, 48 hours is allowed to restore it to an OPERABLE status. If the channel cannot be returned to an OPERABLE status, action must be initiated within the same 48 hours to ensure that all rods are fully inserted, and the Rod Control System must be placed in a condition incapable of rod withdrawal within the next hour. The allowance of 48 hours to restore the channel to OPERABLE status, and the additional hour are justified in Reference 6.

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12/11/00

K.1 and K.2

(continued)

ACTIONS

Condition K applies to the following reactor trip Functions:

- Pressurizer Pressure-Low;
- Pressurizer Water Level-High;
- Reactor Coolant Flow-Low (single loop); and
- Reactor Coolant Flow-Low (both loops).

With one channel inoperable, the inoperable channel must be placed in the tripped condition within 6 hours. Placing the channel in the tripped condition results in a partial trip condition requiring only one additional channel to initiate a reactor trip above the P-7 or P-8 setpoints. These Functions do not have to be OPERABLE below the P-7 and P-8 setpoints because there are no loss of flow trips below these setpoints. There is insufficient heat production to generate DNB conditions below these setpoints. The 6 hours allowed to place the channel in the tripped condition is justified in Reference 6. An additional 6 hours is allowed to reduce THERMAL POWER to below P-7 and P-8 if the inoperable channel cannot be restored to OPERABLE status or placed in trip within the specified Completion Time.

Allowance of this time interval takes into consideration the redundant capability provided by the remaining redundant OPERABLE channels, and the low probability of occurrence of an event during this period that may require the protection afforded by the Functions associated with Condition K.

The Required Actions have been modified by a Note that allows placing the inoperable channel in the bypassed condition for up to 4 hours while performing routine surveillance testing of the other channels. The 4 hour time limit is justified in Reference 6.

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Prairie Island Units 1 and 2

ACTIONS (continued)

L.1 and L.2

Condition L applies to the Loss of Reactor Coolant Pump Underfrequency Buses 11 and 12 (21 and 22) and Undervoltage on Buses 11 and 12 (21 and 22). With one or both channels inoperable on one bus, the inoperable channel(s) must be placed in trip within 6 hours. If the channel(s) cannot be restored to OPERABLE status or the channel(s) placed in trip within the 6 hours, then THERMAL POWER must be reduced below the P-7 and P-8 setpoints within the next 6 hours. This places the unit in a MODE where the LCO is no longer applicable. These trip Functions do not have to be OPERABLE below the P-7 and P-8 setpoints because the AOOs meet their DNB criteria without requiring these trip functions at this low power level. The 6 hours allowed to restore the channel(s) to OPERABLE status or place in trip and the 6 additional hours allowed to reduce THERMAL POWER to below the P-7 and P-8 setpoints are justified in Reference 6.

The Required Actions have been modified by a Note that allows placing one inoperable channel in the bypassed condition for up to 4 hours while performing routine surveillance testing of the other channels. The 4 hour time limit is justified in Reference 6.

M.1 and M.2

Condition M applies to the RCP Breaker Position reactor trip Function. There is one breaker position device per RCP breaker. With one channel inoperable, the inoperable channel must be restored to OPERABLE status within 48 hours. The Completion Time of 48 hours is reasonable considering that there are two automatic actuation trains, other breaker position channels, other flow related trip Functions and the low probability of an event occurring during this interval.

If the channel cannot be restored to OPERABLE status within the 48 hours, then THERMAL POWER must be reduced below the P-7 and

Prairie Island Units 1 and 2

B 3.3.1-49

ACTIONS

M.1 and M.2 (continued)

P-8 setpoints within the next 6 hours. This places the unit in a MODE where the LCO is no longer applicable. This Function does not have to be OPERABLE below the P-7 and P-8 setpoints because the AOO's meet their DNB criteria without requiring this trip function at this low power level.

N.1 and N.2

Condition N applies to Turbine Trip on Low Autostop Oil Pressure or on Turbine Stop Valve Closure. With one channel inoperable, the inoperable channel must be placed in the trip condition within 6 hours. If placed in the tripped condition, this results in a partial trip condition requiring only one additional channel to initiate a reactor trip. If the channel cannot be restored to OPERABLE status or placed in the trip condition, then power must be reduced below the P-9 setpoint within the next 6 hours. The 6 hours allowed to place the inoperable channel in the tripped condition and the 6 hours allowed for reducing power are justified in Reference 6.

The Required Actions have been modified by a Note that allows placing the inoperable channel in the bypassed condition for up to 4 hours while performing routine surveillance testing of the other channel(s). The 4 hour time limit is justified in Reference 6.

<u>O.1 and O.2</u>

Condition O applies to the SI Input from ESFAS reactor trip and the RTS Automatic Trip Logic in MODES 1 and 2. These actions address the train orientation of the RTS for these Functions. With one train inoperable, 6 hours are allowed to restore the train to OPERABLE status (Required Action 0.1) or the unit must be placed

Prairie Island Units 1 and 2

B 3.3.1-50

ACTIONS

O.1 and O.2 (continued)

in MODE 3 within the next 6 hours. The Completion Time of 6 hours (Required Action 0.1) is reasonable considering that in this Condition, the remaining OPERABLE train is adequate to perform the safety function and given the low probability of an event during this interval. The Completion Time of an additional 6 hours (Required Action 0.2) is reasonable, based on operating experience, to reach MODE 3 from full power in an orderly manner and without challenging unit systems.

The Required Actions have been modified by a Note that allows bypassing one train up to 8 hours for surveillance testing, provided the other train is OPERABLE. A train is normally bypassed by placing the bypass breaker in service and opening the associated RTB. The RTB remains OPERABLE under these conditions so that entry into Condition P is not required while performing testing allowed by this Note.

P.1 and P.2

Condition P applies to the RTBs in MODES 1 and 2. These actions address the train orientation of the RTS for the RTBs. With one RTB train inoperable, 1 hour is allowed to restore the RTB to OPERABLE status or the unit must be placed in MODE 3 within the next 6 hours. The Completion Time of an additional 6 hours is reasonable, based on operating experience, to reach MODE 3 from full power in an orderly manner and without challenging unit systems. The 1 hour and 7 hour Completion Times are equal to the time allowed by LCO 3.0.3 for shutdown actions in the event of a complete loss of RTS Function. Placing the unit in MODE 3 results in Action C entry while RTB(s) are inoperable.

Prairie Island Units 1 and 2

B 3.3.1-51

ACTIONS P.1 and P.2 (continued)

The Required Actions have been modified by two Notes. Note 1 allows one train to be bypassed for up to 4 hours for surveillance testing, provided the other train is OPERABLE. Note 2 allows one RTB to be bypassed for up to 4 hours for maintenance on undervoltage or shunt trip mechanisms if the other train is OPERABLE.

Q.1 and Q.2

Condition Q applies to the P-6 and P-10 interlocks. With one or more channel(s) inoperable for one-out-of-two or two-out-of-four coincidence logic, the associated interlock must be verified to be in its required state for the existing unit condition within 1 hour or the unit must be placed in MODE 3 within the next 6 hours. Verifying the interlock status ensures the interlock's Function. The Completion Time of 1 hour is based on operating experience and the minimum amount of time allowed for manual operator actions. The Completion Time of an additional 6 hours is reasonable, based on operating experience, to reach MODE 3 from full power in an orderly manner and without challenging unit systems. The 1 hour and 7 hour Completion Times are equal to the time allowed by LCO 3.0.3 for shutdown actions in the event of a complete loss of RTS Function.

R.1 and R.2

Condition R applies to the P-7, P-8, and P-9 interlocks. With one or more channel(s) inoperable for one-out-of-two or two-out-of-four coincidence logic, the associated interlock must be verified to be in its required state for the existing unit condition within 1 hour or the unit must be placed in MODE 2 within the next 6 hours. These actions are conservative for the case where power level is being

Prairie Island Units 1 and 2

B 3.3.1-52

ACTIONS

R.1 and R.2 (continued)

raised. Verifying the interlock status ensures the interlock's Function. The Completion Time of 1 hour is based on operating experience and the minimum amount of time allowed for manual operator actions. The Completion Time of an additional 6 hours is reasonable, based on operating experience, to reach MODE 2 from full power in an orderly manner and without challenging unit systems.

S.1 and S.2

Condition S applies to the RTB Undervoltage and Shunt Trip Mechanisms, or diverse trip features, in MODES 1 and 2. With one of the diverse trip features inoperable, it must be restored to an OPERABLE status within 48 hours or the unit must be placed in a MODE where the requirement does not apply. This is accomplished by placing the unit in MODE 3 within the next 6 hours (54 hours total time). The Completion Time of an additional 6 hours is a reasonable time, based on operating experience, to reach MODE 3 from full power in an orderly manner and without challenging unit systems.

With the unit in MODE 3, Action C would apply to any inoperable RTB Trip mechanism. The affected RTB shall not be bypassed while one of the diverse features is inoperable except for the time required to perform maintenance to one of the diverse features. The allowable time for performing maintenance of the diverse features is 4 hours, per Condition P.

The Completion Time of 48 hours for Required Action S.1 is reasonable considering that in this Condition there is one remaining diverse feature for the affected RTB, and one OPERABLE RTB capable of performing the safety function and given the low probability of an event occurring during this interval.

Prairie Island Units 1 and 2

B 3.3.1-53

BASES (continued)

SURVEILLANCE	
REQUIREMENTS	

The SRs for each RTS Function are identified by the SRs column of Table 3.3.1-1 for that Function.

A Note has been added to the SR Table stating that Table 3.3.1-1 determines which SRs apply to which RTS Functions.

Note that each channel of reactor protection analog system supplies both trains of the RTS. When testing Channel I, Train A and Train B must be examined. Similarly, Train A and Train B must be examined when testing Channel II, Channel III, and Channel IV (if applicable). The CHANNEL CALIBRATION and COTs are performed in a manner that is consistent with the assumptions used in analytically calculating the required channel accuracies.

<u>SR 3.3.1.1</u>

Performance of the CHANNEL CHECK once every 12 hours ensures that gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the two instrument channels could be an indication of excessive instrument drift in one of the channels or of something even more serious. A CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying that the instrumentation continues to operate properly between each CHANNEL CALIBRATION.

Agreement criteria are determined by the unit staff based on a combination of the channel instrument uncertainties, including indication and readability. If a channel is outside the criteria, it may be an indication that the sensor or the signal processing equipment has drifted outside its limit.

Prairie Island Units 1 and 2

B 3.3.1-54

SURVEILLANCE REQUIREMENTS

 $\underline{SR 3.3.1.1}$ (continued)

The Frequency is based on operating experience that demonstrates channel failure is rare. The CHANNEL CHECK supplements less formal, but more frequent, checks of channels during normal operational use of the displays associated with the LCO required channels.

<u>SR 3.3.1.2</u>

SR 3.3.1.2 compares the calorimetric heat balance calculation to the NIS channel output every 24 hours. If the calorimetric exceeds the NIS channel output by > 2% RTP, the NIS is not declared inoperable, but must be adjusted. If the NIS channel output cannot be properly adjusted, the channel is declared inoperable.

Two Notes modify SR 3.3.1.2. The first Note indicates that the NIS channel output shall be adjusted consistent with the calorimetric results if the absolute difference between the NIS channel output and the calorimetric is > 2% RTP. The second Note clarifies that this Surveillance is required only if reactor power is $\ge 15\%$ RTP and that 12 hours is allowed for performing the first Surveillance after reaching 15% RTP. At lower power levels, calorimetric data are inaccurate.

The Frequency of every 24 hours is adequate. It is based on unit operating experience, considering instrument reliability and operating history data for instrument drift. Together these factors demonstrate the change in the absolute difference between NIS and heat balance calculated powers rarely exceeds 2% in any 24 hour period.

In addition, control room operators periodically monitor redundant indications and alarms to detect deviations in channel outputs.

Prairie Island Units 1 and 2

B 3.3.1-55

SURVEILLANCE
REQUIREMENTS
(continued)SR 3.3.1.3
compares the incore system to the NIS channel output
prior to exceeding 75% RTP after each refueling and every 31
Effective Full Power Days (EFPD). If the absolute difference is
 \geq 3%, the NIS channel is still OPERABLE, but must be readjusted.If the NIS channel cannot be properly readjusted, the channel is
declared inoperable. This Surveillance is performed to verify the
f(ΔI) input to the overtemperature and overpower ΔT Functions.Two Notes modify SR 3.3.1.3. Note 1 indicates that the excore NIS
channel shall be adjusted if the absolute difference between the
incore and excore AFD is \geq 3%.

Note 2 clarifies that the Surveillance is required only if reactor power is $\geq 15\%$ RTP.

The Frequency of once prior to exceeding 75% RTP following each refueling outage considers that the core, and therefore the neutron leakage characteristics, has been changed during a refueling outage such that the previous comparison is no longer valid. The Frequency also recognizes the importance of obtaining accurate excore NIS detector initial response data at high power level prior to NIS channel adjustment. An initial performance at \leq 75% RTP provides a verification prior to attaining full power. The Frequency of every 31 EFPD is adequate. It is based on unit operating experience, considering instrument reliability and operating history data for instrument drift. Also, the slow changes in neutron flux during the fuel cycle can be detected during this interval.

SR 3.3.1.4

SR 3.3.1.4 is the performance of a TADOT every 31 days on a STAGGERED TEST BASIS. This test shall verify OPERABILITY

Prairie Island Units 1 and 2

B 3.3.1-56

SURVEILLANCE REQUIREMENTS

<u>SR 3.3.1.4</u> (continued)

by actuation of the end devices. A successful test of the required contact(s) of a channel relay may be performed by the verification of the change of state of a single contact of the relay. This clarifies what is an acceptable TADOT of a relay. This is acceptable because all of the other required contacts of the relay are verified by other Technical Specifications and non-Technical Specification tests at least once per refueling interval with applicable extensions.

The RTB test shall include separate verification of the undervoltage and shunt trip mechanisms. Verification of the shunt trip Function is not required for the bypass breakers. No capability is provided for performing such a test. When performing this SR, manually trip the UV trip attachment remotely (i.e., from the protection system racks). Note 1 has been added to indicate that this test must be performed on the bypass breaker when placing it in service.

The Frequency of every 31 days on a STAGGERED TEST BASIS is adequate. It is based on industry operating experience, considering instrument reliability and operating history data.

Note 2 excludes verification of setpoints from the TADOT. The Functions affected have no setpoints associated with them.

SR 3.3.1.5

SR 3.3.1.5 is the performance of an ACTUATION LOGIC TEST. The RTS relay logic is tested every 31 days on a STAGGERED TEST BASIS. The train being tested is placed in the bypass condition, thus preventing inadvertent actuation. All logic combinations, with applicable permissives, are tested for each protection function required for the current plant MODE. The Frequency of every 31 days on a STAGGERED TEST BASIS is adequate. It is based on industry operating experience, considering instrument reliability and operating history data.

Prairie Island Units 1 and 2

B 3.3.1-57

SURVEILLANCE

REQUIREMENTS (continued)

<u>SR 3.3.1.6</u>

SR 3.3.1.6 is a calibration of the excore channels to the incore channels. If the measurements do not agree, the excore channels are not declared inoperable but must be calibrated to agree with the incore detector measurements. If the excore channels cannot be adjusted, the channels are declared inoperable. This Surveillance is performed to verify the $f(\Delta I)$ input to the overtemperature and overpower ΔT Functions.

A Note modifies SR 3.3.1.6. The Note states that this Surveillance is required only if reactor power is > 75% RTP and that 24 hours is allowed for performing the first surveillance after reaching 75% RTP.

The Frequency of 92 EFPD is adequate. It is based on industry operating experience, considering instrument reliability and operating history data for instrument drift.

<u>SR 3.3.1.7</u>

SR 3.3.1.7 is the performance of a COT every 92 days. A COT is performed on each required channel to ensure the entire channel will perform the intended Function. A successful test of the required contact(s) of a channel relay may be performed by the verification of the change of state of a single contact of the relay. This clarifies what is an acceptable CHANNEL OPERATIONAL TEST of a relay. This is acceptable because all of the other required contacts of the relay are verified by other Technical Specifications and non-Technical Specification tests at least once per refueling interval with applicable extensions. Setpoints must be within the Allowable Values specified in Table 3.3.1-1.

The difference between the current "as found" values and the previous test "as left" values must be consistent with the drift

Prairie Island Units 1 and 2

B 3.3.1-58

SURVEILLANCE REQUIREMENTS

<u>SR 3.3.1.7</u> (continued)

allowance used in the setpoint methodology. The setpoint shall be left set consistent with the assumptions of the current unit specific setpoint methodology.

The "as found" and "as left" values must also be recorded and reviewed for consistency with the assumptions of Reference 5.

The Frequency of 92 days is justified in Reference 6.

<u>SR 3.3.1.8</u>

SR 3.3.1.8 is the performance of a COT as described in SR 3.3.1.7, except it is modified by a Note that this test shall include verification that the P-6 and P-10 interlocks are in their required state for the existing unit condition. A successful test of the required contact(s) of a channel relay may be performed by the verification of the change of state of a single contact of the relay. Verification that P-6 and P-10 are in their required state for existing plant conditions can also be accomplished by observation of the permissive annunciator window. This clarifies what is an acceptable CHANNEL OPERATIONAL TEST of a relay. This is acceptable because all of the other required contacts of the relay are verified by other Technical Specifications and non-Technical Specification tests at least once per refueling interval with applicable extensions. The Frequency is modified by a Note that allows this surveillance to be satisfied if it has been performed within 92 days of the Frequencies prior to reactor startup. The Frequency of "prior to reactor startup" ensures this surveillance is performed prior to critical operations and applies to the source, intermediate and power range low instrument channels. The Frequency of every 92 days applies if the plant remains in the MODE of Applicability after the initial performances of prior to reactor startup. Once the unit is in MODE 3, this surveillance is no longer required for the power range low and

Prairie Island Units 1 and 2

B 3.3.1-59

SURVEILLANCE REQUIREMENTS

<u>SR 3.3.1.8</u> (continued)

intermediate range channels. This test ensures that the NIS source, intermediate, and power range low channels are OPERABLE prior to taking the reactor critical and after reducing power into the applicable MODE.

SR 3.3.1.9

SR 3.3.1.9 is the performance of a TADOT and is performed every 92 days, as justified in Reference 6. A successful test of the required contact(s) of a channel relay may be performed by the verification of the change of state of a single contact of the relay. This clarifies what is an acceptable TADOT of a relay. This is acceptable because all of the other required contacts of the relay are verified by other Technical Specifications and non-Technical Specification tests at least once per refueling interval with applicable extensions.

The SR is modified by a Note that excludes verification of setpoints from the TADOT. Since this SR applies to undervoltage and underfrequency relays, setpoint verification is accomplished during the CHANNEL CALIBRATION.

SR 3.3.1.10

A CHANNEL CALIBRATION is performed every 24 months, or approximately at every refueling. CHANNEL CALIBRATION is a complete check of the instrument loop, including the sensor where applicable (e.g., the undervoltage and underfrequency relays do not have separate sensors). The test verifies that the channel responds to a measured parameter within the necessary range and accuracy.

Prairie Island Units 1 and 2

B 3.3.1-60

SURVEILLANCE REQUIREMENTS

<u>SR 3.3.1.10</u> (continued)

CHANNEL CALIBRATIONS must be performed consistent with the assumptions of the unit specific setpoint methodology. The difference between the current "as found" values and the previous test "as left" values must be consistent with the drift allowance used in the setpoint methodology.

The Frequency of 24 months is based on the assumption of a 24 month calibration interval in the determination of the magnitude of equipment drift in the setpoint methodology.

SR 3.3.1.10 is modified by a Note stating that this test shall include verification that the time constants are adjusted to the prescribed values where applicable.

SR 3.3.1.11

SR 3.3.1.11 is the performance of a CHANNEL CALIBRATION, as described in SR 3.3.1.10, every 24 months. This SR is modified by two Notes. Note 1 states that neutron detectors are excluded from the CHANNEL CALIBRATION. Note 2 requires the Surveillance to include verification that the time constants, where applicable, are adjusted to the prescribed values. The 24 month Frequency is based on the assumption of a 24 month calibration interval in the determination of the magnitude of equipment drift in the setpoint methodology.

SR 3.3.1.12

SR 3.3.1.12 is the performance of a CHANNEL CALIBRATION, as described in SR 3.3.1.10, every 24 months. This SR is modified by two Notes. Note 1 states that this test shall include verification of

Prairie Island Units 1 and 2

B 3.3.1-61

SURVEILLANCE REQUIREMENTS

<u>SR 3.3.1.12</u> (continued)

the RCS resistance temperature detector (RTD) bypass loop flow rate. Note 2 requires the Surveillance to include verification that the time constants, where applicable, are adjusted to the prescribed values.

The Frequency is justified by the assumption of a 24 month calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis.

SR 3.3.1.13

SR 3.3.1.13 is the performance of a COT of RTS interlocks every 24 months. A successful test of the required contact(s) of a channel relay may be performed by the verification of the change of state of a single contact of the relay. This clarifies what is an acceptable CHANNEL OPERATIONAL TEST of a relay. This is acceptable because all of the other required contacts of the relay are verified by other Technical Specifications and non-Technical Specification tests at least once per refueling interval with applicable extensions.

The Frequency is based on the known reliability of the interlocks and the multichannel redundancy available, and has been shown to be acceptable through operating experience.

SR 3.3.1.14

SR 3.3.1.14 is the performance of a TADOT of the Manual Reactor Trip, RCP Breaker Position, and the SI Input from ESFAS. A successful test of the required contact(s) of a channel relay may be performed by the verification of the change of state of a single contact of the relay. This clarifies what is an acceptable TADOT of

Prairie Island Units 1 and 2

B 3.3.1-62

SURVEILLANCE REQUIREMENTS

<u>SR 3.3.1.14</u> (continued)

a relay. This is acceptable because all of the other required contacts of the relay are verified by other Technical Specifications and non-Technical Specification tests at least once per refueling interval with applicable extensions. This TADOT is performed every 24 months. The test shall independently verify the OPERABILITY of the undervoltage and shunt trip mechanisms for the Manual Reactor Trip Function for the Reactor Trip Breakers. The Reactor Trip Bypass Breaker test shall include testing of the undervoltage trip.

The Frequency is based on the known reliability of the Functions and the multichannel redundancy available, and has been shown to be acceptable through operating experience.

The SR is modified by a Note that excludes verification of setpoints from the TADOT. The Functions affected have no setpoints associated with them.

SR 3.3.1.15

SR 3.3.1.15 is the performance of a TADOT of Turbine Trip Functions. A successful test of the required contact(s) of a channel relay may be performed by the verification of the change of state of a single contact of the relay. This clarifies what is an acceptable TADOT of a relay. This is acceptable because all of the other required contacts of the relay are verified by other Technical Specifications and non-Technical Specification tests at least once per refueling interval with applicable extensions. This test is performed prior to exceeding P-9 interlock whenever the unit has been shutdown in excess of 2 days. This Surveillance is required if not performed within the previous 31 days. A Note states that verification of the Trip Setpoint does not have to be performed for this Surveillance. Performance of this test will ensure that the turbine trip Function is OPERABLE prior to exceeding the P-9 interlock.

Prairie Island Units 1 and 2

B 3.3.1-63

SURVEILLANCE REQUIREMENTS (continued)

<u>SR 3.3.1.16</u>

SR 3.3.1.16 verifies that the individual channel/train actuation response times are less than or equal to the maximum values assumed in the accident analysis. Response time testing acceptance criteria are included in appropriate plant procedures. Individual component response times are typically not modeled in the analyses. The analyses model the overall or total elapsed time, from the point at which the parameter exceeds the trip setpoint value at the sensor to the point at which the equipment reaches the required functional state.

Response time test is performed with the time constants set to their nominal value, provided the required response time is analytically calculated assuming the time constants are set at their nominal values. The response time may be measured by a series of overlapping tests such that the entire response time is measured. As appropriate, each channel's response must be verified every 24 months on a STAGGERED TEST BASIS. Testing of the final actuation devices is included in the testing. Response times cannot be determined during unit operation because equipment operation is required to measure response times. Experience has shown that these components usually pass this surveillance when performed at the 24 month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

REFERENCES

 AEC "General Design Criteria for Nuclear Power Plant Construction Permits," Criterion 14, issued for comment July 10, 1967, as referenced in USAR Section 1.2.

- 2. Regulatory Guide 1.105, Revision 3, "Setpoints for Safety-Related Instrumentation."
- 3. USAR, Section 14.
- 4. USAR, Section 7.

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B 3.3.1-64

REFERENCES (continued)	5.	"Engineering Manual Section 3.3.4.1, Engineering Design Standard for Instrument Setpoint/Uncertainty Calculations".
	6.	WCAP-10271-P-A, Supplement 2, Rev. 1, June 1990.

Prairie Island Units 1 and 2

B 3.3.1-65

B 3.3 INSTRUMENTATION

B 3.3.2 Engineered Safety Feature Actuation System (ESFAS) Instrumentation

BASES

BACKGROUND

AEC GDC Criterion 15, "Engineered Safety Features Protection Systems" (Ref. 1), requires that protection systems shall be provided for sensing accident situations and initiating the operation of necessary engineered safety features.

Accidents are events that are analyzed even though they are not expected to occur during the unit life. One acceptable limit during accidents is that offsite dose shall be maintained within an acceptable fraction of 10 CFR 100 limits. Different accident categories are allowed a different fraction of these limits, based on probability of occurrence. Meeting the acceptable dose limit for an accident category is considered having acceptable consequences for that event.

The ESFAS instrumentation is segmented into interconnected portions as described in the USAR (Ref. 2), and as identified below:

- 1. Field transmitters or process sensors and instrumentation: provide a measurable electronic signal based on the physical characteristics of the parameter being measured;
- 2. Signal processing equipment including Reactor Protection Analog System, arranged in protection channel sets: provide signal conditioning, bistable setpoint comparison, bistable electrical signal output to engineered safety features (ESF) relay logic, and control board/control room/miscellaneous indications; and
- 3. ESF relay logic system including channelized input and logic: initiates the proper ESF actuation in accordance with the defined logic and based on the bistable outputs from the analog protection system.

Prairie Island Units 1 and 2

BACKGROUND (continued)

The Allowable Value in conjunction with the trip setpoint and LCO establishes the threshold for ESFAS action to prevent exceeding acceptable limits such that the consequences of Design Basis Accidents (DBA's) will be acceptable. The Allowable Value is considered a limiting value such that a channel is OPERABLE if the setpoint is found not to exceed the Allowable Value during the CHANNEL OPERATIONAL TEST (COT). Note that, although a channel is "OPERABLE" under these circumstances, the ESFAS setpoint must be left adjusted to within the established calibration tolerance band of the ESFAS setpoint in accordance with the uncertainty assumptions stated in the referenced setpoint methodology (as-left criteria) and confirmed to be operating within the statistical allowances of the uncertainty terms assigned.

Field Transmitters or Sensors

To meet the design demands for redundancy and reliability for the ESFAS Functions, generally two or three field transmitters or sensors are used to measure unit parameters. In many cases, field transmitters or sensors that input to the ESFAS are shared with the Reactor Trip System (RTS). To account for calibration tolerances and instrument drift, which are assumed to occur between calibrations, statistical allowances are provided in the Allowable Values. The OPERABILITY of each transmitter or sensor is determined by either "as-found" calibration data evaluated during the CHANNEL CALIBRATION or by qualitative assessment of field transmitter or sensor, as related to channel behavior observed during performance of the CHANNEL CHECK.

Reactor Protection Analog System

Generally, for ESFAS Functions, two or three channels of instrumentation are used for the signal processing of unit parameters measured by the field instruments. The instrument channels provide

Prairie Island Units 1 and 2

BACKGROUND Reactor Protection Analog System (continued)

signal conditioning, comparable output signals for instruments located on the main control board, and comparison of measured input signals with setpoints that are based on safety analyses (Ref. 3). If the measured value of a unit parameter exceeds the predetermined setpoint, an output from a bistable actuates logic input relays. Channel separation is described in Reference 2.

Generally, three channels with a two-out-of-three logic are sufficient to provide the required reliability and redundancy. If one channel fails in a direction that would not result in a partial Function trip, the Function will still operate with a two-out-of-two logic. If one channel fails such that a partial Function trip occurs, a trip will not occur and the Function will still operate with a one-out-of- two logic. Therefore, a single failure will neither cause nor prevent the protection function actuation. The actual number of channels required for each unit parameter is specified in Reference 2.

Allowable Values and ESFAS Setpoints

The trip setpoints used in the bistables are based on the analytical limits from Reference 3. The selection of these trip setpoints is such that adequate protection is provided when all sensor and processing time delays are taken into account. To allow for calibration tolerances, instrumentation uncertainties, instrument drift, and severe environment errors for those ESFAS channels that must function in harsh environments as defined by 10 CFR 50.49, the Allowable Values specified in Table 3.3.2-1 in the accompanying LCO are conservative with respect to the analytical limits. A detailed description of the methodology used to calculate the Allowable Value and ESFAS setpoints, including their explicit uncertainties, is provided in the plant specific setpoint methodology study (Ref. 4) which incorporates all the known uncertainties are factored into the

Prairie Island Units 1 and 2

BACKGROUND Allowable Values and ESFAS Setpoints (continued)

determination of each ESFAS setpoint and corresponding Allowable Value. The nominal ESFAS setpoint entered into the bistable is more conservative than that specified by the Allowable Value to account for measurement errors detectable by a COT. One example of such a change in measurement error is drift during the surveillance interval. If the measured setpoint does not exceed the Allowable Value, the ESFAS Function is considered OPERABLE.

The ESFAS setpoints are the values at which the bistables are set and is the expected value to be achieved during calibration. The ESFAS setpoint value ensures the safety analysis limits are met for the surveillance interval selected when a channel is adjusted based on stated channel uncertainties. Any bistable is considered to be properly adjusted when the "as-left" setpoint value is within the band for CHANNEL CALIBRATION uncertainty allowance (i.e. calibration tolerance uncertainties).

Setpoints adjusted consistent with the requirements of the Allowable Value ensure that the consequences of DBAs will be acceptable, providing the unit is operated from within the LCOs at the onset of the DBA and the equipment functions as designed.

Each channel can be tested on line to verify that the signal processing equipment and setpoint accuracy is within the specified allowance requirements of Reference 4. Once a designated channel is taken out of service for testing, a simulated signal is injected in place of the field instrument signal. The process equipment for the channel in test is then tested, verified, and calibrated. SRs for the channels are specified in the SR section.

ESF Relay Logic System

The relay logic equipment uses outputs from the analog bistables. To meet the redundancy requirements, two trains of relay logic, each

Prairie Island Units 1 and 2

BACKGROUND ESF Relay Logic System (continued)

performing the same functions, are provided. If one train is taken out of service for maintenance or test purposes, the second train will provide ESF actuation for the unit. Each train is packaged in its own set of cabinets for physical and electrical separation to satisfy separation and independence requirements.

The ESF relay logic system performs the decision logic for most ESF equipment actuation; generates the electrical output signals that initiate the required actuation; and provides the status, permissive, and annunciator output signals to the main control room of the unit. The relay logic consists of input, master and slave relays. The bistable outputs are combined via the input relays into logic matrices that represent combinations indicative of various transients. If a required logic matrix combination is completed, the appropriate master and slave relays are energized. The master and slave relays cause actuation of those components whose aggregate Function best serves to alleviate the condition and restore the unit to a safe condition. Examples are given in the Applicable Safety Analyses, LCO, and Applicability sections of this Bases.

Each relay logic train has built in test features that allow testing the decision logic matrix and master relay functions while the unit is at power. When any one train is taken out of service for testing, the other train is capable of providing unit monitoring and protection until the testing has been completed.

APPLICABLE SAFETY ANALYSES, LCO, AND APPLICABILITY Each of the analyzed accidents can be detected by one or more ESFAS Functions. One of the ESFAS Functions is the primary actuation signal for that accident. An ESFAS Function may be the primary actuation signal for more than one type of accident.

An ESFAS Function may also be a secondary, or backup, actuation signal for one or more other accidents. For example, Pressurizer

Prairie Island Units 1 and 2

APPLICABLE SAFETY ANALYSES, LCO, AND APPLICABILITY (continued) Low Pressure is a primary actuation signal for loss of coolant accidents (LOCAs) and a backup actuation signal for steam line breaks (SLBs) inside containment. Functions such as manual initiation, not specifically credited in the safety analysis, are qualitatively credited in the safety analysis and the NRC staff approved licensing basis for the unit. These Functions may provide protection for conditions that do not require dynamic transient analysis to demonstrate Function performance. These Functions may also serve as backups to Functions that were credited in the accident analysis (Ref. 3).

The LCO requires all instrumentation performing an ESFAS Function to be OPERABLE. A channel is OPERABLE with a trip setpoint outside its calibration tolerance band provided the trip setpoint "as-found" value does not exceed its associated Allowable Value and provided the trip setpoint "as-left" value is adjusted to within the calibration tolerance band. Failure of any instrument renders the affected channel(s) inoperable and reduces the reliability of the affected Functions.

The LCO generally requires OPERABILITY of two or three channels in each instrumentation function and two channels in each logic and manual initiation function. The two-out-of-three configuration allows one channel to be tripped during maintenance or testing without causing an ESFAS initiation. Two logic or manual initiation channels are required to ensure no single random failure disables the ESFAS.

The required channels of ESFAS instrumentation provide unit protection in the event of any of the analyzed accidents. ESFAS protection functions are as follows:

1. Safety Injection

Safety Injection (SI) provides two primary functions:

Prairie Island Units 1 and 2

B 3.3.2-6

APPLICABLE	1. Safety Injection (continued)
SAFETY ANALYSES, LCO, AND APPLICABILITY	 Primary side water addition to ensure maintenance or recovery of reactor vessel water level (coverage of the active fuel for heat removal, clad integrity, and for limiting peak clad temperature to < 2200°F); and
	2. Boration to ensure recovery and maintenance of SDM.
	These functions are necessary to mitigate the effects of a LOC or SLB, both inside and outside of containment. The SI signa also used to initiate other functions such as:
	• Containment Isolation;
	• Containment Ventilation Isolation;
	• Reactor Trip;
	• Feedwater Isolation;
	• Auxiliary Feedwater (AFW); and
	• Control room ventilation isolation.
	These other functions ensure:
	• Isolation of nonessential systems through containment penetrations;
	• Trip of the reactor to limit power generation;
	• Isolation of main feedwater to limit containment pressurization;
	• Start of AFW to ensure secondary side cooling capability

Prairie Island Units 1 and 2

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B 3.3.2-7

ESFAS Instrumentation B 3.3.2

APPLICABLE	1. <u>S</u>	afety Injection (continued)
SAFETY ANALYSES,	•	Isolation of the control room to ensure habitability.
LCO, AND APPLICABILITY	a.	Safety Injection-Manual Initiation
		The LCO requires two channels to be OPERABLE. The operator can initiate SI at any time by using either of two switches in the control room. This action will cause actuation of all components in the same manner as any of the automatic actuation signals.
		The LCO for the Manual Initiation Function ensures the proper amount of redundancy is maintained in the manual ESFAS actuation circuitry to ensure the operator has manual ESFAS initiation capability.
		Each channel consists of one switch and the interconnectin wiring to the actuation logic cabinet. Each switch actuates both trains. This configuration does not allow testing at power. The Applicability of the SI Manual Initiation Function is discussed with the Automatic Actuation Relay Logic Function below.
	Ъ	Safety Injection-Automatic Actuation Relay Logic
		This LCO requires two trains to be OPERABLE. The SI actuation logic consists of all circuitry housed within the ESF relay logic cabinets for the SI actuation subsystem, including the initiating relay contacts responsible for actuating the ESF equipment.
		Manual and automatic initiation of SI must be OPERABL in MODES 1, 2, and 3. In these MODES, there is sufficie energy in the primary and secondary systems to warrant automatic initiation of ESF systems.

Units 1 and 2

b. <u>Safety Injection-Automatic Actuation Relay Logic</u> (continued)

Manual Initiation is also required in MODE 4 even though automatic actuation is not required. In this MODE, adequate time is available to manually actuate required components in the event of a DBA, but because of the large number of components actuated on a SI, actuation is simplified by the use of the manual actuation switches. Automatic actuation relay logic must be OPERABLE in MODE 4 to support system level manual initiation.

These Functions are not required to be OPERABLE in MODES 5 and 6 because there is adequate time for the operator to evaluate unit conditions and respond by manually starting individual systems, pumps, and other equipment to mitigate the consequences of an abnormal condition or accident. Unit pressure and temperature are very low and many ESF components are administratively locked out or otherwise prevented from actuating to prevent inadvertent overpressurization of unit systems.

c. Safety Injection-High Containment Pressure

This signal provides protection against the following accidents:

• SLB inside containment; and

LOCA.

Three OPERABLE channels are sufficient to satisfy protective requirements with a two-out-of-three logic. The transmitters and electronics are located outside of

Prairie Island Units 1 and 2

B 3.3.2-9

c. <u>Safety Injection-High Containment Pressure</u> (continued)

containment with the sensing line located inside containment. Thus, the high pressure Function will not experience any adverse environmental conditions and the Allowable Value reflects only steady state instrument uncertainties.

High Containment Pressure must be OPERABLE in MODES 1, 2, and 3 when there is sufficient energy in the primary and secondary systems to warrant automatic initiation of ESF systems. In MODES 4, 5, and 6, plant conditions are such that the probability of an event requiring Emergency Core Cooling System (ECCS) injection is extremely low. In MODE 4, adequate time is available to manually actuate required components in the event of a DBA.

d. Safety Injection-Pressurizer Low Pressure

This signal provides protection against the following accidents:

- Inadvertent opening of a steam generator (SG) relief or safety valve;
- SLB;
- Rupture of a control rod drive mechanism housing (rod ejection);
- Inadvertent opening of a pressurizer relief or safety valve;

Prairie Island Units 1 and 2

B 3.3.2-10

d. <u>Safety Injection-Pressurizer Low Pressure</u> (continued)

- LOCAs; and
- SG Tube Rupture.

Pressurizer pressure provides both control and protection functions: input to the pressurizer pressure control system, reactor trip, and SI. However, two independent Power Operated Relief Valve (PORV) open signals must be present before a PORV can open. Therefore, a single pressure channel failing high will not fail a PORV open and trigger a depressurization event, which may then require SI actuation. Thus, three OPERABLE channels are sufficient to satisfy the protective requirements with a two-out-of-three logic.

The transmitters are located inside containment, with the taps in the vapor space region of the pressurizer, and thus possibly experiencing adverse environmental conditions (LOCA, SLB inside containment, rod ejection). Therefore, the Allowable Value reflects the inclusion of both steady state and adverse environmental instrument uncertainties.

This Function must be OPERABLE in MODES 1, 2, and 3 with pressurizer pressure ≥ 2000 psig. This signal may be manually blocked by the operator when pressurizer pressure is < 2000 psig. Automatic SI actuation below this pressure setpoint is then performed by the High Containment Pressure signal.

This Function is not required to be OPERABLE in MODE 3 when pressurizer pressure is < 2000 psig. Other ESF

Prairie Island Units 1 and 2

B 3.3.2-11

d. <u>Safety Injection-Pressurizer Low Pressure</u> (continued)

functions are used to detect accident conditions and actuate the ESF systems in this MODE. In MODES 4, 5, and 6, this Function is not needed for accident detection and mitigation.

e. Safety Injection-Steam Line Low Pressure

Steam Line Low Pressure provides protection against the following accidents:

• SLB;

• Feed line break; and

• Inadvertent opening of an SG safety valve.

Steam line pressure transmitters provide input to control functions, but the control function cannot initiate events that the Function acts to mitigate. Thus, three OPERABLE channels on each steam line are sufficient to satisfy the protective requirements with a two-out-of-three logic on each steam line.

With the transmitters typically located in the vicinity of the main steam lines, it is possible for them to experience adverse environmental conditions during a secondary side break. Therefore, the Allowable Value reflects both steady state and adverse environmental instrument uncertainties.

This Function is anticipatory in nature and has a typical lead/lag ratio of 12/2.

Prairie Island Units 1 and 2

B 3.3.2-12

PPLICABLE AFETY NALYSES, CO, AND PPLICABILITY	e.	Safety Injection-Steam Line Low Pressure (continued) Steam Line Low Pressure must be OPERABLE in MODES 1, 2, and 3 with pressurizer pressure ≥ 2000 psig, when a secondary side break or stuck open safety valve could result in the rapid depressurization of the steam lines. This signal may be manually blocked by the operator when pressurizer pressure is < 2000 psig. When pressurizer pressure is < 2000 psig, feed line break is not a concern. This Function is not required to be OPERABLE in MODE 4, 5, or 6 because there is insufficient energy in the secondary side of the unit to cause an accident.
2.	. <u>Co</u>	ntainment Spray
	Co	ntainment Spray (CS) provides three primary functions:
	1.	Lowers containment pressure and temperature after a LOCA or SLB in containment;
	2.	Reduces the amount of radioactive iodine in the containment atmosphere; and
	3.	Adjusts the pH of the water in the containment sump after a large break LOCA.
	Th	ese functions are necessary to:
	•	Ensure the pressure boundary integrity of the containment structure;
	•	Limit the release of radioactive iodine to the environment in the event of a failure of the containment structure; and

Prairie Island Units 1 and 2

B 3.3.2-13

BASES

A Sa A L A

BASES	
APPLICABLE SAFETY ANALYSES, LCO, AND APPLICABILITY	 2. <u>Containment Spray</u> (continued) Minimize corrosion of the components and systems inside containment following a LOCA. The CS actuation signal starts the CS pumps and aligns the discharge of the pumps to the CS nozzle headers in the upper
	levels of containment. Water is initially drawn from the RWST by the CS pumps and mixed with a sodium hydroxide solution from the spray additive tank. Containment spray is actuated manually or by High High Containment Pressure.
	a. Containment Spray-Manual Initiation
	The LCO requires two channels to be OPERABLE. The operator can initiate CS at any time from the control room by simultaneously turning two CS actuation switches. Because an inadvertent actuation of CS could have such serious consequences, two switches must be turned simultaneously to initiate both trains of CS. The inoperability of either switch may fail both trains of manual initiation.
	Each channel consists of one switch and the interconnecting wiring to the actuation logic cabinets. The Applicability of the CS Manual Initiation Function is discussed with the Automatic Actuation Relay Logic Function below. Note that manual initiation of CS also actuates containment ventilation isolation.
	b. <u>Containment Spray-Automatic Actuation Relay Logic</u> The CS actuation logic consists of all circuitry housed within the ESF relay logic cabinets for the CS actuation subsystem, in the same manner as described for ESFAS Function 1.b.
<u></u>	
Prairie Island Units 1 and 2	B 3.3.2-14 12/11/00

B 3.3.2

ESFAS Instrumentation

b. <u>Containment Spray-Automatic Actuation Relay Logic</u> (continued)

Manual and automatic initiation of CS must be OPERABLE in MODES 1, 2, and 3 when there is a potential for an accident to occur, and sufficient energy in the primary or secondary systems to pose a threat to containment integrity due to overpressure conditions. Manual initiation is also required in MODE 4, even though automatic actuation is not required. In this MODE, adequate time is available to manually actuate required components in the event of a DBA by the use of the manual actuation switches. Automatic actuation relay logic must be OPERABLE in MODE 4 to support system level manual initiation. In MODES 5 and 6, there is insufficient energy in the primary and secondary systems to result in containment overpressure. In MODES 5 and 6, there is also adequate time for the operators to evaluate unit conditions and respond, to mitigate the consequences of abnormal conditions by manually starting individual components.

c. Containment Spray-High High Containment Pressure

This signal provides protection against a LOCA or an SLB inside containment. The transmitters and electronics are located outside of containment with the sensing lines located inside containment. Thus, they will not experience any adverse environmental conditions and the Allowable Value reflects only steady state instrument uncertainties.

This is one of the only Functions that requires the bistable output to energize to perform its required action. It is not desirable to have a loss of power actuate CS, since the consequences of an inadvertent actuation of CS could be serious.

Prairie Island Units 1 and 2

B 3.3.2-15

c. <u>Containment Spray-High High Containment Pressure</u> (continued)

High High Containment Pressure uses three sets of two channels, each set combined in a one-out-of-two configuration, with these outputs combined so that three sets tripped initiates CS. This arrangement exceeds the minimum redundancy requirements. High High Containment Pressure must be OPERABLE in MODES 1, 2, and 3 when there is sufficient energy in the primary and secondary sides to pressurize the containment following a pipe break. In MODES 4, 5, and 6, there is insufficient energy in the primary and secondary sides to overpressurize containment.

3. Containment Isolation

Containment Isolation (CI) provides isolation of the containment atmosphere, and process systems that penetrate containment, from the environment. This Function is necessary to prevent or limit the release of radioactivity to the environment in the event of a LOCA.

The CI signal isolates all automatically isolable process lines except instrument air and main steam lines, which require a steam line isolation signal.

a. Containment Isolation-Manual Initiation

Manual CI is actuated by either of two switches in the control room. Either switch actuates both trains. Note that manual initiation of CI also actuates Containment Ventilation Isolation.

Prairie Island Units 1 and 2

APPLICABLE SAFETY ANALYSES, LCO, AND APPLICABILITY

a. Containment Isolation-Manual Initiation (continued)

The LCO requires two channels to be OPERABLE. Each channel consists of one switch and the interconnecting wiring to the actuation logic cabinets. The Applicability of the CI Manual Initiation Function is discussed with the Automatic Actuation Relay Logic Function below.

b. Containment Isolation-Automatic Actuation Relay Logic

The CI actuation logic consists of all circuitry housed within the ESF relay logic cabinets for the CI actuation subsystem in the same manner as described for ESFAS Function 1.b.

Manual and automatic initiation of CI must be OPERABLE in MODES 1, 2, and 3, when there is a potential for an accident to occur. Manual initiation is also required in MODE 4 even though automatic actuation is not required. In this MODE, adequate time is available to manually actuate required components in the event of a DBA, but because of the large number of components actuated on a CI, actuation is simplified by the use of the manual actuation switches.

Automatic actuation relay logic must be OPERABLE in MODE 4 to support system level manual initiation. In MODES 5 and 6, there is insufficient energy in the primary or secondary systems, in the event of a line break, to pressurize the containment to require CI. There is adequate time for the operator to evaluate unit conditions and manually actuate individual isolation valves in response to abnormal or accident conditions.

Prairie Island Units 1 and 2

B 3.3.2-17

APPLICABLE SAFETY ANALYSES, LCO, AND APPLICABILITY (continued) c. Containment Isolation Safety Injection

Containment Isolation is initiated by all Functions that initiate SI via the SI signal. The CI requirements for these Functions are the same as the requirements for their SI function. Therefore, the requirements are not repeated in Table 3.3.2-1. Instead, Function 1, SI, is referenced for all initiating Functions and requirements.

4. Steam Line Isolation

Isolation of the main steam lines provides protection in the event of an SLB inside or outside containment. Rapid isolation of the steam lines will limit the steam break accident to the blowdown from one SG, at most. For an SLB upstream of the main steam isolation valves (MSIVs), inside or outside of containment, closure of the non-return check valves or the MSIVs limits the accident to the blowdown from only the affected SG. For an SLB downstream of the MSIVs, closure of the MSIVs terminates the accident.

a. Steam Line Isolation-Automatic Actuation Relay Logic

The steam line isolation actuation logic consists of all circuitry housed within the ESF relay logic cabinets for the steam line isolation subsystem in the same manner as described for ESFAS Function 1.b.

Manual and automatic initiation of steam line isolation must be OPERABLE in MODES 1, 2, and 3 when there is sufficient energy in the RCS and SGs to have an SLB. This could result in the release of significant quantities of energy and cause a cooldown of the primary system. The Steam Line Isolation Function is required in MODES 2 and 3 unless both MSIVs are closed. In MODES 4, 5, and 6, there is insufficient energy in the RCS and SGs to experience an SLB releasing significant quantities of energy.

Prairie Island Units 1 and 2

B 3.3.2-18

ESFAS Instrumentation B 3.3.2

BASES

APPLICABLE SAFETY ANALYSES, LCO, AND APPLICABILITY

- -Steam-Line-Isolation (continued)
 - b. Steam Line Isolation-High High Containment Pressure

This Function actuates closure of the MSIVs in the event of a LOCA or an SLB inside containment to maintain at least one unfaulted SG as a heat sink for the reactor. Three OPERABLE channels are sufficient to satisfy protective requirements with two-out-of-three logic. The transmitters and electronics are located outside containment with the sensing line located inside containment. Thus, they will not experience any adverse environmental conditions, and the Allowable Value reflects only steady state instrument uncertainties.

High High Containment Pressure must be OPERABLE in MODES 1, 2, and 3, when there is sufficient energy in the primary and secondary side to pressurize the containment following a pipe break. This would cause a significant increase in the containment pressure, thus allowing detection and closure of the MSIVs. The Steam Line Isolation Function remains OPERABLE in MODES 2 and 3 unless both MSIVs are closed. In MODES 4, 5, and 6, there is not enough energy in the primary and secondary sides to overpressurize containment.

c. <u>Steam Line Isolation-Low Low T_{avg} Coincident</u> With Safety Injection

This Function provides closure of the MSIVs during an SLB or inadvertent opening of an SG safety value to maintain at least one unfaulted SG as a heat sink for the reactor.

Prairie Island Units 1 and 2

c. <u>Steam Line Isolation-Low Low T_{avg} Coincident</u> With Safety Injection (continued)

The main steam line isolates if an SI signal is present with a low low RCS average temperature. The Main Steam Line Isolation Function requirements for the SI Functions are the same as the requirements for their SI function. Therefore, the requirements are not repeated in Table 3.3.2-1. Instead, Function 1, SI, is referenced for all initiating functions and requirements.

Two channels of T_{avg} per loop are required to be OPERABLE. The T_{avg} channels are combined in a logic such that two channels tripped cause a trip for the parameter. The accidents that this Function protects against cause reduction of T_{avg} in the entire primary system. Therefore, the provision of two OPERABLE channels per loop in a two-out-of-four configuration ensures no single random failure disables the Low Low T_{avg} Function. The T_{avg} channels provide control inputs, but the control function cannot initiate events that the Function acts to mitigate. Therefore, additional channels are not required to address control protection interaction issues.

With the T_{avg} resistance temperature detectors (RTDs) located inside the containment, it is possible for them to experience adverse environmental conditions during an SLB event. Therefore, the Allowable Value reflects both steady state and adverse environmental instrumental uncertainties.

Prairie Island Units 1 and 2

B 3.3.2-20

APPLICABLE SAFETY ANALYSES, LCO, AND APPLICABILITY c. <u>Steam Line Isolation-Low Low T_{avg} Coincident</u> With Safety Injection (continued)

This Function must be OPERABLE in MODES 1 and 2, and in MODE 3, when T_{avg} is above 520 °F, when a secondary side break or stuck open valve could result in rapid depressurization of the steam lines. The Steam Line Isolation Function is required to be OPERABLE in MODES 2 and 3 unless both MSIVs are closed. This Function is not required to be OPERABLE in MODES 4, 5, and 6 because there is insufficient energy in the secondary side of the unit to have an accident.

d. <u>Steam Line Isolation-High High Steam Flow</u> Coincident With Safety Injection

This Function provides closure of the MSIVs during a SLB to maintain at least one unfaulted SG as a heat sink for the reactor.

Two steam line flow channels per steam line are required to be OPERABLE for this Function. These are combined in a one-out-of-two logic to indicate high steam flow in one steam line. The steam flow transmitters provide control inputs, but the control function cannot cause the events that the Function must protect against. Therefore, two channels are sufficient to satisfy redundancy requirements.

The Allowable Value for High High Steam Flow is a ΔP corresponding to $\leq 4.5E6$ lb/hr at 735 psig.

With the transmitters located inside containment, it is possible for them to experience adverse environmental

Prairie Island Units 1 and 2

B 3.3.2-21

APPLICABLE SAFETY ANALYSES, LCO, AND APPLICABILITY

d. <u>Steam Line Isolation-High High Steam Flow</u> Coincident With Safety Injection (continued)

conditions during an SLB event. Therefore, the Allowable Value reflects both steady state and adverse environmental instrument uncertainties.

The main steam lines isolate if the High High Steam Flow signal occurs coincident with an SI signal. The Main Steam Line Isolation Function requirements for the SI Functions are the same as the requirements for their SI function. Therefore, the requirements are not repeated in Table 3.3.2-1. Instead, Function 1, SI, is referenced for all initiating functions and requirements.

This Function must be OPERABLE in MODES 1, 2, and 3 when a secondary side break could result in rapid depressurization of the steam lines unless both MSIVs are closed. This Function is not required to be OPERABLE in MODES 4, 5, and 6 because there is insufficient energy in the secondary side of the unit to have an accident.

5. Feedwater Isolation

The primary function of the Feedwater Isolation signal is to limit containment pressurization during an SLB. This Function also mitigates the effects of a high water level in the SGs, which could result in carryover of water into the steam lines and excessive cooldown of the primary system. The SG high water level is due to excessive feedwater flows.

Prairie Island Units 1 and 2

B 3.3.2-22

The Function performs the following:

- Trips the main turbine;
- Trips the main feedwater (MFW) pumps; and
- Shuts the MFW regulating valves (MFRVs) and the MFRV bypass valves.

This Function is actuated by High High SG Water Level, or by an SI signal. In the event of SI, the unit is taken off line. The MFW System is also taken out of operation and the AFW System is automatically started. The SI signal was discussed previously.

a. Feedwater Isolation-Automatic Actuation Relay Logic

The feedwater isolation actuation logic consists of all circuitry housed within the ESF relay logic cabinets for the feedwater isolation subsystem, in the same manner as described for ESFAS Function 1.b.

This Function must be OPERABLE in MODES 1, 2, and 3, except when all MFRV's and associated bypass valves are closed and in manual or isolated by a closed non-automatic valve, when a secondary side break could result in significant containment pressurization. This Function is not required to be OPERABLE in MODES 4, 5, and 6 because there is insufficient energy in the secondary side of the unit to cause an accident.

Prairie Island Units 1 and 2

B 3.3.2-23

12/11/00

BASES

ANALYSES,

APPLICABILITY

LCO, AND

APPLICABLE SAFETY ANALYSES, LCO, AND APPLICABILITY (continued)

b. <u>Feedwater Isolation-High High Steam Generator</u> Water Level

This signal provides protection against excessive feedwater flow. The SG water level instruments provide input to the Feedwater Control System. Therefore, the actuation logic must be able to withstand both an input failure to the control system (which may then require the protection function actuation) and a single failure in the other channels providing the protection function actuation. Median signal selection is used in the Feedwater Control System. Thus, three OPERABLE channels are sufficient to satisfy the requirements with a two-out-of-three logic. The transmitters (d/p cells) are located inside containment. However, the events that this Function protects against cannot cause a severe environment in containment. Therefore, the Allowable Value reflects only steady state instrument uncertainties.

This Function must be OPERABLE in MODES 1 and 2, except when all MFRV's and associated bypass valves are closed and in manual or isolated by a closed non-automatic valve. In MODES 3, 4, 5, and 6, the MFW System and the turbine generator are normally not in service and this Function is not required to be OPERABLE.

Prairie Island Units 1 and 2

B 3.3.2-24

APPLICABLE SAFETY ANALYSES, LCO, AND APPLICABILITY (continued)

c. Feedwater Isolation-Safety Injection

Feedwater Isolation is also initiated by all Functions that initiate SI via the SI signal. The Feedwater Isolation Function requirements for these Functions are the same as the requirements for their SI function. Therefore, the requirements are not repeated in Table 3.3.2-1. Instead Function 1, SI, is referenced for all initiating functions and requirements.

6. Auxiliary Feedwater

The AFW System is designed to provide a secondary side heat sink for the reactor in the event that the MFW System is not available. The system has a motor driven pump and a turbine driven pump, making it available during normal unit operation, during a loss of AC power, a loss of MFW, and during a Feedwater System pipe break. The normal source of water for the AFW System is the condensate storage tank (CST) (not safety related). Upon low level in the CST, the operators can manually realign the pump suctions to the Cooling Water (CL) System (safety related). The AFW System is aligned so that upon a pump start, flow is initiated to the SGs immediately.

a. Auxiliary Feedwater-Automatic Actuation Relay Logic

The auxiliary feedwater actuation logic consists of all circuitry housed within the reactor protection relay logic cabinets for the auxiliary feedwater actuation subsystem.

Prairie Island Units 1 and 2

B 3.3.2-25

APPLICABLE SAFETY ANALYSES, LCO, AND APPLICABILITY (continued)

b. <u>Auxiliary Feedwater-Low Low Steam Generator Water</u> Level

Low Low SG Water Level provides protection against a loss of heat sink. A feed line break, inside or outside of containment, or a loss of MFW, would result in a loss of SG water level. The SG water level instruments provide input to the Feedwater Control System. Therefore, the actuation logic must be able to withstand both an input failure to the control system which may then require a protection function actuation and a single failure in the other channels providing the protection function actuation. Median signal selection is used in the Feedwater Control System. Thus, three OPERABLE channels per SG are sufficient to satisfy the requirements with a two-out-of-three logic.

With the transmitters (d/p cells) located inside containment and thus possibly experiencing adverse environmental conditions (feed line break), the Allowable Value reflects the inclusion of both steady state and adverse environmental instrument uncertainties.

c. Auxiliary Feedwater-Safety Injection

An SI signal starts the motor driven and turbine driven AFW pumps. The AFW initiation functions are the same as the requirements for their SI function. Therefore, the requirements are not repeated in Table 3.3.2-1. Instead, Function 1, SI, is referenced for all initiating functions and requirements.

Prairie Island Units 1 and 2

B 3.3.2-26

APPLICABLE SAFETY ANALYSES, LCO, AND APPLICABILITY c. <u>Auxiliary Feedwater-Safety Injection</u> (continued)

Functions 6.a through 6.c must be OPERABLE in MODES 1, 2, and 3 to ensure that the SGs remain the heat sink for the reactor. Low Low SG Water Level in any operating SG will cause the AFW pumps to start. The system is aligned so that upon a start of the pump, water immediately begins to flow to the SGs. These Functions do not have to be OPERABLE in MODES 5 and 6 because there is not enough heat being generated in the reactor to require the SGs as a heat sink. In MODE 4, AFW actuation does not need to be OPERABLE because either AFW or residual heat removal (RHR) will already be in operation to remove decay heat or sufficient time is available to manually place either system in operation.

d. <u>Auxiliary Feedwater-Undervoltage on Buses</u> <u>11 and 12 (21 and 22)</u>

A loss of power on the buses that provide power to the MFW pumps provides indication of a pending loss of MFW flow. The undervoltage Function senses the voltage upstream of each MFW pump breaker. A loss of power for both MFW pumps will start the turbine driven AFW pump to ensure that at least one SG contains enough water to serve as the heat sink for reactor decay heat and sensible heat removal following the reactor trip.

Prairie Island Units 1 and 2

B 3.3.2-27

APPLICABLE SAFETY ANALYSES, LCO, AND APPLICABILITY (continued)

e. Auxiliary Feedwater-Trip of Both Main Feedwater Pumps

A trip of both MFW pumps is an indication of a loss of MFW and the subsequent need for some method of decay heat and sensible heat removal to bring the reactor back to no load temperature and pressure. Motor driven MFW pumps are equipped with a breaker position sensing device. A trip of both MFW pumps starts the motor driven and turbine driven AFW pumps to ensure that at least one SG is available with water to act as the heat sink for the reactor.

Functions 6.d and 6.e must be OPERABLE in MODES 1 and 2. This ensures that at least one SG is provided with water to serve as the heat sink to remove reactor decay heat and sensible heat in the event of an accident. In MODES 3, 4, and 5, the MFW pumps may be normally shut down, and thus neither the pump trip or bus undervoltage are indicative of a condition requiring automatic AFW initiation. Also, in MODE 2 the AFW system may be used for SG level control. The MFW trip is bypassed by placing the AFW pump CS in shutdown auto when AFW is aligned for this purpose. Low low SG level provides protection during this operation.

The ESFAS instrumentation satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii).

Prairie Island Units 1 and 2

B 3.3.2-28

BASES (continued)

ACTIONS

A Note has been added in the ACTIONS to clarify the application of Completion Time rules. The Conditions of this Specification may be entered independently for each Function listed on Table 3.3.2-1.

In the event a channel's setpoint is found nonconservative with respect to the Allowable Value, or the transmitter, instrument loop, or bistable is found inoperable, then all affected Functions provided by that channel must be declared inoperable and the LCO Condition(s) entered for the protection Function(s) affected. When the Required Channels in Table 3.3.2-1 are specified (e.g., on a per steam line, per loop, per SG, etc., basis), then the Condition may be entered separately for each steam line, loop, SG, etc., as appropriate.

When the number of inoperable channels in a trip function exceed those specified in one or other related Conditions associated with a trip function, then the unit may be outside the safety analysis. Therefore, LCO 3.0.3 should be immediately entered if applicable in the current MODE of operation.

<u>A.1</u>

Condition A applies to all ESFAS protection functions.

Condition A addresses the situation where one or more channels or trains for one or more Functions are inoperable at the same time. The Required Action is to refer to Table 3.3.2-1 and to take the Required Actions for the protection functions affected. The Completion Times are those from the referenced Conditions and Required Actions.

Prairie Island Units 1 and 2

B 3.3.2-29

ACTIONS (continued)

B.1, B.2.1 and B.2.2

Condition B applies to manual initiation of:

• SI;

• Containment Spray (CS); and

• Containment Isolation (CI).

This action addresses the train orientation of the ESF relay logic for the functions listed above. If a channel or train is inoperable, 48 hours is allowed to return it to an OPERABLE status. The specified Completion Time is reasonable considering that there are two automatic actuation trains and another manual initiation channel OPERABLE for each Function (except for CS), and the low probability of an event occurring during this interval. If the channel cannot be restored to OPERABLE status, the unit must be placed in a MODE in which the LCO does not apply. This is done by placing the unit in at least MODE 3 within an additional 6 hours (54 hours total time) and in MODE 5 within an additional 30 hours (84 hours total time). The allowable Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

C.1, C.2.1 and C.2.2

Condition C applies to the automatic actuation relay logic for the following functions:

- SI;
- CS; and
- CI.

Prairie Island Units 1 and 2

B 3.3.2-30

ACTIONS C.1, C.2.1 and C.2.2 (continued)

This action addresses the train orientation of the ESF relay logic. If one train is inoperable, 6 hours are allowed to restore the train to OPERABLE status. The specified Completion Time is reasonable considering that there is another train OPERABLE, and the low probability of an event occurring during this interval. If the train cannot be restored to OPERABLE status, the unit must be placed in a MODE in which the LCO does not apply. This is done by placing the unit in at least MODE 3 within an additional 6 hours (12 hours total time) and in MODE 5 within an additional 30 hours (42 hours total time). The Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

The Required Actions are modified by a Note that allows one train to be bypassed for up to 8 hours for surveillance testing, provided the other train is OPERABLE. This allowance is based on the reliability analysis assumption of WCAP-10271-P-A (Ref. 5) that 8 hours is the average time required to perform relay logic train surveillance.

D.1, D.2.1, and D.2.2

Condition D applies to:

- High Containment Pressure;
- Pressurizer Low Pressure;
- Steam Line Low Pressure;
- CS High High Containment Pressure;
- Steam Line Isolation High High Containment Pressure;

Prairie Island Units 1 and 2

B 3.3.2-31

ACTIONS	D.1, D.2.1, and D.2.2 (continued)
	• Low Low T _{avg} Coincident With Safety Injection;
	• High High Steam Flow Coincident With Safety Injection; a
	• Low Low SG Water level.
	If one channel is inoperable, 6 hours are allowed to restore the channel to OPERABLE status or to place it in the tripped condit Generally this Condition applies to functions that operate on two-out-of-three logic. Therefore, failure of one channel places Function in a two-out-of-two configuration. One channel must be tripped to place the Function in a one-out-of-three configuration satisfies redundancy requirements.
	Failure to restore the inoperable channel to OPERABLE status of place it in the tripped condition within 6 hours requires the unit be placed in MODE 3 within the following 6 hours and MODE 4 we the next 6 hours.
	The allowed Completion Times are reasonable, based on operati experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems. In MODE 4, these Functions are no longer required OPERABLE.
	The Required Actions are modified by a Note that allows the inoperable channel to be bypassed for up to 4 hours for surveillar testing of other channels. The 6 hours allowed to restore the cha to OPERABLE status or to place the inoperable channel in the tripped condition, and the 4 hours allowed for testing, are justified Reference 5.

J.

B 3.3.2-32

ACTIONS (continued) E.1.1, E.1.2, E.2.1, and E.2.2

Condition E applies to CS High High Containment Pressure. Condition E addresses the situation where two of the six containment pressure channels are inoperable at the same time. With one channel tripped per Condition D, one of the three sets is actuated. Tripping the second channel could actuate the second set. This is undesirable because a single failure would then cause spurious containment spray initiation. Spurious spray actuation is undesirable because of the cleanup problems presented. With one channel bypassed, one OPERABLE channel remains available to actuate the second set and two OPERABLE channels are available to provide the one of two logic for the third set to actuate CS. Furthermore, with one channel bypassed, a single instrumentation channel failure will not spuriously initiate containment spray.

To avoid the inadvertent actuation of containment spray, both inoperable channels should not be placed in the tripped condition. Instead one is bypassed. Restoring the channel(s) to OPERABLE status, or placing the other inoperable channel in the bypass condition within 6 hours, is sufficient to assure that the Function remains OPERABLE and minimizes the time that the Function may be in a partial trip condition (assuming the inoperable channel has failed high). The Completion Time is further justified based on the low probability of an event occurring during this interval. Failure to restore the inoperable channel(s) to OPERABLE status, or place one in the bypassed condition within 6 hours, requires the unit be placed in MODE 3 within the following 6 hours and MODE 4 within the next 6 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems. In MODE 4, this Function is a no longer required OPERABLE.

Prairie Island Units 1 and 2

B 3.3.2-33

ACTIONS

<u>E.1.1, E.1.2, E.2.1, and E.2.2</u> (continued)

The Required Actions are modified by a Note that allows the tripped channel to be bypassed for up to 4 hours for surveillance testing. Placing a second channel in the bypass condition for up to 4 hours for testing purposes is acceptable based on the results of Reference 5.

F.1, F.2.1, and F.2.2

Condition F applies to the automatic actuation relay logic for the Steam Line Isolation and Feedwater Isolation Functions.

The action addresses the train orientation of the ESF relay logic for these functions. If one train is inoperable, 6 hours are allowed to restore the train to OPERABLE status. The Completion Time for restoring a train to OPERABLE status is reasonable considering that there is another train OPERABLE, and the low probability of an event occurring during this interval. If the train cannot be returned to OPERABLE status, the unit must be brought to MODE 3 within the next 6 hours and MODE 4 within the following 6 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems. Placing the unit in MODE 4 removes all requirements for OPERABILITY of the actuation function. In this MODE, the unit does not have analyzed transients or conditions that require the explicit use of the Functions noted above.

The Required Actions are modified by a Note that allows one train to be bypassed for up to 8 hours for surveillance testing provided the other train is OPERABLE. This allowance is based on the reliability analysis (Ref. 5) assumption that 8 hours is the average time required to perform relay logic train surveillance.

Prairie Island Units 1 and 2

B 3.3.2-34

MC Tin rea with lor Th ince tes ince for jus <u>H.</u> Co 22] If c	ODE 3 within the following 6 hours. The allowed Completion me of 6 hours is reasonable, based on operating experience, to ach MODE 3 from full power conditions in an orderly manner a thout challenging unit systems. In MODE 3, this Function is no ager required OPERABLE. The Required Actions are modified by a Note that allows the operable channel to be bypassed for up to 4 hours for surveilland ting of other channels. The 6 hours allowed to place the operable channel in the tripped condition, and the 4 hours allowed to a second channel to be in the bypassed condition for testing, an stified in Reference 5.
MC Tin rea with lor Th ince tes ince for jus <u>H.</u> Co 22 If c	ODE 3 within the following 6 hours. The allowed Completion me of 6 hours is reasonable, based on operating experience, to ach MODE 3 from full power conditions in an orderly manner a thout challenging unit systems. In MODE 3, this Function is no ager required OPERABLE. The Required Actions are modified by a Note that allows the operable channel to be bypassed for up to 4 hours for surveilland ting of other channels. The 6 hours allowed to place the operable channel in the tripped condition, and the 4 hours allowed to a second channel to be in the bypassed condition for testing, an attified in Reference 5.
MC Tin rea with lor Th ince tes ince for jus <u>H.</u> Co 22 If c	ODE 3 within the following 6 hours. The allowed Completion me of 6 hours is reasonable, based on operating experience, to ach MODE 3 from full power conditions in an orderly manner a thout challenging unit systems. In MODE 3, this Function is no ager required OPERABLE. The Required Actions are modified by a Note that allows the operable channel to be bypassed for up to 4 hours for surveilland ting of other channels. The 6 hours allowed to place the operable channel in the tripped condition, and the 4 hours allowed to a second channel to be in the bypassed condition for testing, an attified in Reference 5.
MC Tin rea with lor Th inc tes inc for jus <u>H.</u> Co 22	ODE 3 within the following 6 hours. The allowed Completion me of 6 hours is reasonable, based on operating experience, to ach MODE 3 from full power conditions in an orderly manner a thout challenging unit systems. In MODE 3, this Function is no ager required OPERABLE. The Required Actions are modified by a Note that allows the operable channel to be bypassed for up to 4 hours for surveilland ting of other channels. The 6 hours allowed to place the operable channel in the tripped condition, and the 4 hours allow a second channel to be in the bypassed condition for testing, and thifted in Reference 5.
MC Tin rea with lor Th inc tes inc for jus <u>H.</u> Co	ODE 3 within the following 6 hours. The allowed Completion me of 6 hours is reasonable, based on operating experience, to ach MODE 3 from full power conditions in an orderly manner a thout challenging unit systems. In MODE 3, this Function is no ager required OPERABLE. The Required Actions are modified by a Note that allows the operable channel to be bypassed for up to 4 hours for surveillan ting of other channels. The 6 hours allowed to place the operable channel in the tripped condition, and the 4 hours allow to a second channel to be in the bypassed condition for testing, and this of the reference 5.
MC Tin rea with lor Th inc tes inc for jus	ODE 3 within the following 6 hours. The allowed Completion me of 6 hours is reasonable, based on operating experience, to ach MODE 3 from full power conditions in an orderly manner a thout challenging unit systems. In MODE 3, this Function is no ager required OPERABLE. The Required Actions are modified by a Note that allows the operable channel to be bypassed for up to 4 hours for surveillan ting of other channels. The 6 hours allowed to place the operable channel in the tripped condition, and the 4 hours allow a second channel to be in the bypassed condition for testing, a stified in Reference 5.
MC Tin rea with lor Th inc tes inc for	ODE 3 within the following 6 hours. The allowed Completion me of 6 hours is reasonable, based on operating experience, to ach MODE 3 from full power conditions in an orderly manner a thout challenging unit systems. In MODE 3, this Function is no ager required OPERABLE. We Required Actions are modified by a Note that allows the operable channel to be bypassed for up to 4 hours for surveillan thing of other channels. The 6 hours allowed to place the operable channel in the tripped condition, and the 4 hours allow a second channel to be in the bypassed condition for testing, a
MC Tin rea wit	ODE 3 within the following 6 hours. The allowed Completion me of 6 hours is reasonable, based on operating experience, to ach MODE 3 from full power conditions in an orderly manner a thout challenging unit systems. In MODE 3, this Function is n
res	e 6 hour Completion Time is justified in Reference 5. Failure to store the inoperable channel to OPERABLE status or place it in tripped condition within 6 hours requires the unit to be placed
cha If I	one channel is inoperable, 6 hours are allowed to restore one annel to OPERABLE status or to place it in the tripped condition placed in the tripped condition, the Function is then in a partial p condition where one-out-of-two logic will result in actuation.
	ondition G applies to High High SG Water Level.
ACTIONS <u>G.</u> (continued)	1 and G.2

B 3.3.2-35

ACTIONS H.1 and H.2 (continued)

in the tripped condition. If placed in the tripped condition, the Function is then in a partial trip condition where one-out-of-two channels on the other bus will result in actuation. The 6 hour Completion Time is justified in Reference 5. Failure to restore the inoperable channel(s) to OPERABLE status or place it in the tripped condition within 6 hours requires the unit to be placed in MODE 3 within the following 6 hours. The allowed Completion Time of 6 hours is reasonable, based on operating experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging unit systems. In MODE 3, this Function is no longer required OPERABLE.

The Required Actions are modified by a Note that allows the inoperable channel to be bypassed for up to 4 hours for surveillance testing of other channels. The 6 hours allowed to place the inoperable channel in the tripped condition, and the 4 hours allowed for a second channel to be in the bypassed condition for testing, are justified in Reference 5.

I.1 and I.2

Condition I applies to the AFW pump start on trip of both MFW pumps and to the AFW automatic actuation relay logic functions.

The OPERABILITY of the AFW System must be assured by allowing automatic start of the AFW System pumps. If a channel or logic train is inoperable, the applicable Condition(s) and Required Action(s) of LCO 3.7.5, "Auxiliary Feedwater (AFW) System," are entered for the associated AFW Train.

Prairie Island Units 1 and 2

B 3.3.2-36

BASES (continued)

SURVEILLANCEThe SRs for each ESFAS Function are identified by the SRsREQUIREMENTScolumn of Table 3.3.2-1.

A Note has been added to the SR Table to clarify that Table 3.3.2-1 determines which SRs apply to which ESFAS Functions.

Note that each channel of reactor protection analog system supplies both trains of the ESFAS. When testing Channel I, Train A and Train B must be examined. Similarly, Train A and Train B must be examined when testing Channel II, Channel III, and Channel IV (if applicable). The CHANNEL CALIBRATION and COTs are performed in a manner that is consistent with the assumptions used in analytically calculating the required channel accuracies.

SR 3.3.2.1

Performance of the CHANNEL CHECK once every 12 hours ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the two instrument channels could be an indication of excessive instrument drift in one of the channels or of something even more serious. A CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying the instrumentation continues to operate properly between each CHANNEL CALIBRATION.

Agreement criteria are determined by the unit staff, based on a combination of the channel instrument uncertainties, including indication and reliability. If a channel is outside the criteria, it may be an indication that the sensor or the signal processing equipment has drifted outside its limit.

Prairie Island Units 1 and 2

SURVEILLANCE REQUIREMENTS

 $\underline{SR 3.3.2.1}$ (continued)

The Frequency is based on operating experience that demonstrates channel failure is rare. The CHANNEL CHECK supplements less formal, but more frequent, checks of channels during normal operational use of the displays associated with the LCO required channels.

<u>SR 3.3.2.2</u>

SR 3.3.2.2 is the performance of an ACTUATION LOGIC TEST. The ESF relay logic is tested every 31 days on a STAGGERED TEST BASIS. The train being tested is placed in the test condition, thus preventing inadvertent actuation. All possible logic combinations are tested for each ESFAS function. The test includes actuation of master and slave relays whose contact outputs remain within the relay logic. The test condition inhibits actuation of the master and slave relays whose contact outputs remain equipment actuation. Where the relays are not actuated, the test circuitry provides a continuity check of the relay coil. This verifies that the logic is OPERABLE and that there is a signal path to the output relay coils. The Frequency of every 31 days on a STAGGERED TEST BASIS is adequate. It is based on industry operating experience, considering instrument reliability and operating history data.

<u>SR 3.3.2.3</u>

SR 3.3.2.3 is the performance of a COT.

A COT is performed on each required channel to ensure the entire channel will perform the intended Function. Setpoints must be

Prairie Island Units 1 and 2

B 3.3.2-38

SURVEILLANCE REQUIREMENTS

<u>SR 3.3.2.3</u> (continued)

found within the Allowable Values specified in Table 3.3.2-1. A successful test of the required contact(s) of a channel (logic input) relay may be performed by the verification of the change of state of a single contact of the relay. This clarifies what is an acceptable CHANNEL OPERATIONAL TEST of a relay. This is acceptable because all of the other required contacts of the relay are verified by other Technical Specifications and non-Technical Specifications tests at least once per refueling interval with applicable extensions.

The difference between the current "as found" values and the previous test "as left" values must be consistent with the drift allowance used in the setpoint methodology. The setpoint shall be left set consistent with the assumptions of the current unit specific setpoint methodology.

The "as found" and "as left" values must also be recorded and reviewed for consistency with the assumptions of the surveillance interval extension analysis (Ref. 5) when applicable.

The Frequency of 92 days is justified in Reference 5.

SR 3.3.2.4

SR 3.3.2.4 is the performance of a TADOT. This SR is a check of the following ESFAS Instrumentation Functions:

- 1. CS Manual Initiation;
- 2. CI Manual Initiation;
- 3. AFW pump start on Undervoltage on Buses 11 and 12 (21 and 22); and
- 4. AFW pump start on trip of both MFW pumps.

Prairie Island Units 1 and 2

B 3.3.2-39

SURVEILLANCE REQUIREMENTS

 $\underline{SR 3.3.2.4}$ (continued)

This SR is performed every 24 months. A successful test of the required contact(s) of a channel (logic input) relay may be performed by the verification of the change of state of a single contact of the relay. This clarifies what is an acceptable TADOT of a relay. This is acceptable because all of the other required contacts of the relay are verified by other Technical Specifications and non-Technical Specifications tests at least once per refueling interval with applicable extensions. The Frequency is adequate, based on industry operating experience and is consistent with the typical refueling cycle. The SR is modified by a Note that excludes verification of setpoints during the TADOT. The Functions, except the undervoltage start of the AFW pumps, have no associated setpoints. For the undervoltage start of the AFW pumps, setpoint verification is covered by other SRs.

SR 3.3.2.5

This SR is the performance of a TADOT to check the Safety Injection Manual Initiation Function. It is performed every 24 months on a STAGGERED TEST BASIS. The Frequency is adequate, based on industry operating experience and is consistent with a typical refueling cycle.

The SR is modified by a Note that excludes verification of setpoints during the TADOT. The manual initiation Function has no associated setpoints.

SR 3.3.2.6

SR 3.3.2.6 is the performance of a CHANNEL CALIBRATION.

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SURVEILLANCE REQUIREMENTS

 $\underline{SR 3.3.2.6}$ (continued)

A CHANNEL CALIBRATION is performed every 24 months, or approximately at every refueling. CHANNEL CALIBRATION is a complete check of the instrument loop, including the sensor. The test verifies that the channel responds to measured parameter within the necessary range and accuracy.

CHANNEL CALIBRATIONS must be performed consistent with the assumptions of the unit specific setpoint methodology. The difference between the current "as found" values and the previous test "as left" values must be consistent with the drift allowance used in the setpoint methodology.

The Frequency of 24 months is based on the assumption of a 24 month calibration interval in the determination of the magnitude of equipment drift in the setpoint methodology.

This SR is modified by a Note stating that this test should include verification that the time constants are adjusted to the prescribed values where applicable.

REFERENCES

- AEC "General Design Criteria for Nuclear Power Plant Construction Permits," Criterion 15, issued for comment July 10, 1967, as referenced in USAR Section 1.2.
 - 2. USAR, Section 7.
 - 3. USAR, Section 14.
 - 4. "Engineering Manual Section 3.3.4.1, Engineering Design Standard for Instrument Setpoint/Uncertainty Calculations".
 - 5. WCAP-10271-P-A, Supplement 2, Rev. 1, June 1990.

Prairie Island Units 1 and 2

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B 3.3 INSTRUMENTATION

B 3.3.3 Event Monitoring (EM) Instrumentation

BASES

BACKGROUND The primary purpose of the EM instrumentation is to display unit variables that provide information required by the control room operators during accident situations.

The OPERABILITY of the accident monitoring instrumentation ensures that there is sufficient information available on selected unit parameters to monitor and to assess unit status and behavior following an accident.

The availability of accident monitoring instrumentation is important so that responses to corrective actions can be observed and the need for, and magnitude of, further actions can be determined. These essential instruments are identified by the USAR (Ref. 1) addressing the recommendations of Regulatory Guide 1.97 (Ref. 2) as required by Supplement 1 to NUREG-0737.

The instrument channels required to be OPERABLE by this LCO include two classes of parameters identified during unit specific implementation of Regulatory Guide 1.97 as Type A and Category I variables.

Type A variables are included in this LCO because they provide the primary information required for the control room operator to take specific manually controlled actions for which no automatic control is provided, and that are required for safety systems to accomplish their safety functions for DBAs.

Category I variables are the key variables deemed risk significant because they are needed to:

• Determine whether other systems important to safety are performing their intended functions;

Prairie Island Units 1 and 2

B 3.3.3-1

BACKGROUND (continued)	• Provide information to the operators that will enable them to determine the likelihood of a gross breach of the barriers to radioactivity release; and
	• Provide information regarding the release of radioactive materials to allow for early indication of the need to initiate action necessary to protect the public, and to estimate the magnitude of any impending threat.
	These key variables are identified by the unit specific Regulatory Guide 1.97 analyses (Ref. 1). These analyses identify the unit specific Type A and Category I variables and provide justification for deviating from Reference 2.
	The specific instrument Functions listed in Table 3.3.3-1 are discussed in the LCO section.
APPLICABLE SAFETY ANALYSES	The EM instrumentation ensures the operability of Regulatory Guide 1.97 Type A and Category I variables so that the control ro operating staff can:
	• Perform the diagnosis specified in the emergency operating procedures (these variables are restricted to preplanned action for the primary success path of DBAs), e.g., loss of coolant accident (LOCA);
	• Take the specified, preplanned, manually controlled actions, i which no automatic control is provided, and that are required safety systems to accomplish their safety function;
	• Determine whether systems important to safety are performin their intended functions;
	• Determine the likelihood of a gross breach of the barriers to radioactivity release;

EM Instrumentation B 3.3.3

APPLICABLE SAFETY	• Determine if a gross breach of a barrier has occurred; and
ANALYSES (continued)	• Initiate action necessary to protect the public and to estimate the magnitude of any impending threat.
	EM instrumentation that meets the definition of Type A in Regulatory Guide 1.97 satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii). Category I, non-Type A, instrumentation is inclu- in TS because it is intended to assist operators in minimizing the consequences of accidents. Therefore, Category I, non-Type A, variables are important for reducing public risk and satisfy Criteri 4 of 10 CFR 50.36(c)(2)(ii).
	The EM instrumentation LCO provides OPERABILITY requirements for Regulatory Guide 1.97 Type A instrument variables, which provide information required by the control room operators to perform certain manual actions specified in the Emergency Operating Procedures. These manual actions ensure that a system can accomplish its safety function, and are credited in the safety analyses. Additionally, this LCO addresses Regulatory Guide 1.97 instruments that have been designated Category I, non-Type A.
	The OPERABILITY of the EM instrumentation ensures there is sufficient information available on selected unit parameters to monitor and assess unit status following an accident. This capabi is consistent with Reference 1.
	LCO 3.3.3 requires two OPERABLE channels for most Function Two OPERABLE channels ensure no single failure prevents operators from getting the information necessary for them to determine the safety status of the unit, and to bring the unit to and maintain it in a safe condition following an accident.

Prairie Island Units 1 and 2

EM Instrumentation B 3.3.3

LCO (continued)	Furthermore, OPERABILITY of two channels allows a CHANN CHECK during the post accident phase to confirm the validity of displayed information.
	An exception to the two channel requirement is Containment Isolation Valve (CIV) Position. In this case, the important information is the status of the containment penetrations. The Ly requires one position indicator for each active CIV. This is sufficient to redundantly verify the isolation status of each isolat penetration either via indicated status of the active valve and prior knowledge of a passive valve, or via system boundary status. If normally active CIV is known to be closed and deactivated, posi indication is not needed to determine status. Therefore, the positi indication for valves in this state is not required to be OPERABI
	Table 3.3.3-1 lists all Type A and Category I variables identified the unit specific Regulatory Guide 1.97 analyses, as amended by NRC's SER, as identified in Reference 3.
	Type A and Category I variables are required to meet Regulatory Guide 1.97 Category I (Ref. 2) design and qualification requiren for seismic and environmental qualification, single failure criteri utilization of emergency standby power, immediately accessible display, continuous readout, and recording of display.
	Listed below are discussions of the specified instrument Function listed in Table 3.3.3-1.
	1, 2. Power Range and Source Range Neutron Flux (Logarithm Scale)
÷	Power Range and Source Range Neutron Flux (Logarithm Scale) indication is provided to verify reactor shutdown. T two ranges are necessary to cover the full range of flux tha may occur post accident.
	Neutron flux is used for accident diagnosis, verification of subcriticality, and diagnosis of positive reactivity insertion

Prairie Island Units 1 and 2

LCO	3,4.	Reactor Coolant System (RCS) Hot and Cold Leg
(continued)		Temperatures
		RCS Hot and Cold Leg Temperatures are Category I variables provided for verification of core cooling and long term surveillance.
		In addition, RCS cold leg temperature is used in conjunction with RCS hot leg temperature to verify the unit conditions necessary to establish natural circulation in the RCS. RCS hot and cold leg temperature is also used for unit stabilization and cooldown control.
		The channels provide indication over a range of 50°F to 700°F.
	5.	Reactor Coolant System (RCS) Pressure (Wide Range)
		RCS wide range pressure is a Category I variable provided for verification of core cooling and RCS integrity long term surveillance.
		RCS pressure is used to verify when there should be SI flow to RCS from at least one train, when the RCS pressure is below the pump shutoff head.
		In addition to these verifications, RCS pressure is used for determining RCS subcooling margin. RCS subcooling margin will allow termination of SI, if still in progress, or reinitiation of SI if it has been stopped. RCS pressure can also be used:
		• to determine whether to terminate actuated SI or to reinitiate stopped SI;
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B 3.3.3-5

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LCO	5.	Reactor Coolant System Pressure (RCS) (Wide Range) (continued)
		• to determine when to reset SI and shut off RHR;
		 to determine when to manually restart Emergency Core Cooling System (ECCS) Pumps;
		• as reactor coolant pump (RCP) trip criteria; and
		• to make a determination on the nature of the accident in progress and where to go next in the procedure.
		RCS subcooling margin is also used for unit stabilization and cooldown control.
		RCS pressure is also related to three decisions about depressurization. They are:
		 to determine whether to proceed with primary system depressurization;
		• to verify termination of depressurization; and
		• to determine whether to close accumulator isolation valve during a controlled cooldown/depressurization.
		RCS pressure is a Category I, Type A variable because the operator uses this indication to monitor the cooldown of the RCS following a steam generator tube rupture (SGTR) or small break LOCA. Operator actions to maintain a controlled cooldown, such as adjusting steam generator (SG) pressure on level, would use this indication. Furthermore, RCS pressure is one factor that may be used in decisions to terminate RCP operation.

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B 3.3.3-6

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LCO	6.	Reactor Vessel Water Level
(continued)		Reactor Vessel Water Level is provided for verification and long term surveillance of core cooling. It is also used for accident diagnosis and to determine reactor coolant inventory adequacy.
		The Reactor Vessel Water Level Monitoring System provides a direct measurement of the collapsed liquid level above the bottom of the vessel. The collapsed level represents the amount of liquid mass that is in the reactor vessel. Measurement of the collapsed water level is selected because i is a direct indication of the water inventory.
	7.	Containment Sump Water Level (Wide Range)
		Containment Sump Water Level is provided for verification and long term surveillance of RCS integrity.
		Containment Sump Water Level is used for accident diagnosis and to determine when to begin the recirculation procedure.
	8.	Containment Pressure (Wide Range)
		Containment Pressure (Wide Range) is provided for verification of RCS and containment OPERABILITY.
	9.	Penetration Flow Path Automatic Containment Isolation Valve (CIV) Position
		CIV Position is provided for verification of Containment OPERABILITY and containment isolation.
		When used to verify containment isolation, the important information is the isolation status of the containment

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B 3.3.3-7

LCO

9. <u>Penetration Flow Path Automatic Containment Isolation Valve</u> (CIV) Position (continued)

penetrations. The LCO requires one channel of valve position indication in the control room to be OPERABLE for each active CIV in a containment penetration flow path, i.e., two total channels of CIV position indication for a penetration flow path with two active valves. The position indication in the control room requirement is satisfied by the individual valve position indication lights (red or green) or the Containment Isolation panel 44104 (44515) white status lights. For containment penetrations with only one active CIV having control room indication, Note (b) requires a single channel of valve position indication to be OPERABLE. This is sufficient to redundantly verify the isolation status of each isolable penetration either via indicated status of the active valve, as applicable, and prior knowledge of a passive valve, or via system boundary status. If a normally active CIV is known to be closed and deactivated, position indication is not needed to determine status. Therefore, the position indication for valves in this state is not required to be OPERABLE. Note (a) to the Required Channels states that the Function is not required for isolation valves whose associated penetration is isolated by at least one closed and deactivated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured. Each penetration is treated separately and each penetration flow path is considered a separate Function. Therefore, separate Condition entry is allowed for each penetration flow path.

10. Containment Area Radiation (High Range)

Containment Area Radiation is provided to monitor for the potential of significant radiation releases and to provide release assessment for use by operators in determining the need to

Prairie Island Units 1 and 2

B 3.3.3-8

BASES	·		
LCO	10.	Containment Area Radiation (High Range) (continued)	
		invoke site emergency plans. Containment radiation level used to determine if a LOCA with core damage has occurr	
	11.	Hydrogen Monitors	
		Hydrogen Monitors are provided to detect high hydrogen concentration conditions that represent a potential for containment breach from a hydrogen explosion. This varia is also important in verifying the adequacy of mitigating actions.	able
	12.	Pressurizer Level	
· . ·		Pressurizer Level is used to determine whether to terminat if still in progress, or to reinitiate SI if it has been stopped. Knowledge of pressurizer water level is also used to verify unit conditions necessary to establish natural circulation in RCS and to verify that the unit is maintained in a safe shutdown condition.	y the
	13.	Steam Generator Water Level (Wide Range)	
		SG Water Level is provided to monitor operation of decay removal via the SGs. The Category I indication of SG leve the wide range level instrumentation. The wide range leve covers a span of 0% to 100% between the lower tubesheet the separator.	el is el
		SG Water Level (Wide Range) is used to:	
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Prairie Island Units 1 and 2		B 3.3.3-9 12/1	11/0

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BASES		· · · · · · · · · · · · · · · · · · ·
LCO	13.	Steam Generator Water Level (Wide Range) (continued)
		• verify that the intact SGs are an adequate heat sink for the reactor;
		• determine the nature of the accident in progress (e.g., verify an SGTR); and
		• verify unit conditions for termination of SI.
		Operator action is based on the control room indication of SG level. Wide range level is a Type A variable because the operator must manually raise and control SG level to ensure decay heat removal.
	14.	Condensate Storage Tank (CST) Level
		CST Level is provided to ensure water supply for auxiliary feedwater (AFW). The CSTs provide a nonsafety grade water supply for the AFW System. The CSTs consist of three 150,000 gallon tanks connected to both units by a common outlet header. Inventory is monitored by a 0% to 100% level indication. CST Level is displayed on a control room indicator and unit computer. In addition, a control room annunciator alarms on low level.
		CST Level is considered a Type D variable.
		The DBAs that require AFW are the steam line break (SLB) and LOCA.
		Reference Technical Specification Bases 3.7.6, "Condensate Storage Tanks" for additional information.

Units 1 and 2

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B 3.3.3-10

LCO (continued)	15.	Core Exit Temperature
(Core Exit Temperature is provided for verification and long term surveillance of core cooling.
		An evaluation was made of the minimum number of valid co exit thermocouples (CET) necessary for measuring core cooling. The evaluation determined the reduced complement of CETs necessary to detect initial core recovery and trend the ensuing core heatup. Adequate core cooling monitoring is ensured with four valid CETs per quadrant (Ref. 3). Core Ex Temperature is used to determine RCS subcooling margin. RCS subcooling margin will allow termination of safety injection (SI), if still in progress, or reinitiation of SI if it has been stopped. RCS subcooling margin is also used for unit stabilization and cooldown control.
		In accordance with Reference 3, due to the size of the reacto core, four thermocouples OPERABLE in the center region of the core and at least one thermocouple in each quadrant of the outside core region are needed to provide radial temperature gradient monitoring. The center core region is defined by the following CETs and their locations.

LCO

15. Core Exit Temperature (continued)

CET Number	CET Location
9	D-5
10	D-7
12	E-4
13	E-6
14	E-10
16	F-7
18	G-4
19	G-6
22	H-5
23	H-9
28	I-4
29	I-8
30	I-10
32	J-6
33	J-8
34	J-9

These required thermocouples ensure a single failure will not disable the ability to determine the radial temperature gradient.

16. Refueling Water Storage Tank (RWST) Level

The RWST Level is a Category I, Type A variable provided for verifying a water source to the ECCS and Containment Spray, determining the time for initiation of recirculation following a LOCA, and event diagnosis.

Prairie Island Units 1 and 2

B 3.3.3-12

BASES (continued)

APPLICABILITY The EM instrumentation LCO is applicable in MODES 1 and 2. These variables are related to the diagnosis and preplanned actions required to mitigate DBAs. In MODES 3, 4, 5, and 6, unit conditions are such that the likelihood of an event that would require EM instrumentation is low; therefore, the EM instrumentation is not required to be OPERABLE in these MODES.

ACTIONS Note 1 has been added in the ACTIONS to exclude the MODE change restriction of LCO 3.0.4. This exception allows entry into the applicable MODE while relying on the ACTIONS even though the ACTIONS may eventually require unit shutdown. This exception is acceptable due to the passive function of the instruments, the operator's ability to respond to an accident using alternate instruments and methods, and the low probability of an event requiring these instruments.

Note 2 has been added in the ACTIONS to clarify the application of Completion Time rules. The Conditions of this Specification may be entered independently for each Function listed on Table 3.3.3-1. The Completion Time(s) of the inoperable channel(s) of a Function will be tracked separately for each Function starting from the time the Condition was entered for that Function.

Note 3 has been added in the ACTIONS to clarify that the required CET channels shall be OPERABLE prior to entering MODE 2 following each refueling outage.

<u>A.1</u>

Condition A applies when one or more Functions have one required channel that is inoperable. Required Action A.1 requires restoring the inoperable channel to OPERABLE status within 30 days. The 30 day Completion Time is based on operating experience and takes

Prairie Island Units 1 and 2

B 3.3.3-13

ACTIONS

A.1 (continued)

into account the remaining OPERABLE channel, the passive nature of the instrument (no critical automatic action is assumed to occur from these instruments), and the low probability of an event requiring EM instrumentation during this interval.

A Note has been added stating that Condition A is not applicable to the CETs. The CETs are controlled under Conditions B, F, and G.

<u>B.1</u>

Condition B applies when there is one or more required CET channel(s) inoperable and with at least 4 CETs OPERABLE in the center region of the core, and at least one CET OPERABLE in each quadrant of the outside core region. Required Action B.1 requires restoring the required CET channel(s) to OPERABLE status within 30 days. The 30 day Completion Time is acceptable based on operating experience and takes into account the remaining OPERABLE CETs, and the low probability of an event requiring EM Instrumentation during this interval.

<u>C.1</u>

Condition C applies when the Required Action and associated Completion Time for Condition A or B are not met. This Required Action specifies a written report to be submitted to the NRC within 14 days. This report discusses the results of the evaluation of the inoperability and identifies proposed restorative actions. This action is appropriate in lieu of a shutdown requirement since alternative actions are identified before loss of functional capability, and given the likelihood of unit conditions that would require information provided by this instrumentation.

Prairie Island Units 1 and 2

B 3.3.3-14

ACTIONS

(continued)

<u>D.1</u>

Condition D applies when one or more Functions have two inoperable required channels (i.e., two channels inoperable in the same Function). Required Action D.1 requires restoring one channel in the Function(s) to OPERABLE status within 7 days. The Completion Time of 7 days is based on the relatively low probability of an event requiring EM instrument operation and the availability of alternate means to obtain the required information. Continuous operation with two required channels inoperable in a Function is not acceptable because the alternate indications may not fully meet all performance qualification requirements applied to the EM instrumentation. Therefore, requiring restoration of one inoperable channel of the Function limits the risk that the EM Function will be in a degraded condition should an accident occur. Condition D is modified by a Note that excludes hydrogen monitor channels and CET channel(s).

<u>E.1</u>

Condition E applies when two hydrogen monitor channels are inoperable. Required Action E.1 requires restoring one hydrogen monitor channel to OPERABLE status within 72 hours. The 72 hour Completion Time is reasonable based on the backup capability of the Post Accident Sampling System to monitor the hydrogen concentration for evaluation of core damage and to provide information for operator decisions. Also, it is unlikely that a LOCA (which would cause core damage) would occur during this time.

Prairie Island Units 1 and 2

B 3.3.3-15

ACTIONS (continued)

<u>F.1</u>

Condition F applies when three or more required CET channels are inoperable in one or more quadrants and less than four CET channels are OPERABLE in the center region of the core. Required Action F.1 requires restoring the required inoperable channels to OPERABLE status within 7 days. The 7 day Completion Time is acceptable based on operating experience and taking into account the remaining CETs and the low probability of an event occurring that would require the CETs to assess the reactor core.

<u>G.1</u>

Condition G applies when three or more required CET channels are inoperable in one or more quadrants and less than one CET channel OPERABLE in each quadrant of the outside core region. Required Action G.1 requires restoring the required inoperable channels to OPERABLE status within 7 days. The 7 day Completion Time is acceptable based on operating experience taking into account the remaining CETs and the low probability of an event occurring that would require the CETs to assess the reactor core.

H.1

Condition H applies when the Required Action and associated Completion Time of Condition D, E, F, or G are not met. Required Action H.1 requires entering the appropriate Condition referenced in Table 3.3.3-1 for the channel immediately. The applicable Condition referenced in the Table is Function dependent. Each time an inoperable channel has not met any Required Action of Condition D, E, F, or G and the associated Completion Time has expired, Condition H is entered for that channel and provides for transfer to the appropriate subsequent Condition.

Prairie Island Units 1 and 2

B 3.3.3-16

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ACTIONS

(continued)

<u>I.1</u>

If the Required Action and associated Completion Time of Condition H is not met and Table 3.3.3-1 directs entry into Condition I, the unit must be brought to a MODE where the requirements of this LCO do not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours.

The allowed Completion Time is reasonable, based on operating experience, to reach the required unit condition from full power condition from full power conditions in an orderly manner and without challenging unit systems.

<u>J.1</u>

Alternate means (e.g., CETs) of monitoring Reactor Vessel Water Level and Containment Area Radiation have been developed and tested. These alternate means may be temporarily installed if the normal EM channel cannot be restored to OPERABLE status within the allotted time. If these alternate means are used, the Required Action is not to shut down the unit but rather to submit a report to the NRC. The report provided to the NRC should discuss the alternate means used, describe the degree to which the alternate means are equivalent to the installed EM channels, justify the areas in which they are not equivalent, and provide a schedule for restoring the normal EM channels.

Prairie Island Units 1 and 2

B 3.3.3-17

BASES (continued)

SURVEILLANCE REQUIREMENTS

A Note has been added to the SR Table to clarify that SR 3.3.3.1 and SR 3.3.2 apply to each EM instrumentation Function in Table 3.3.3-1, except Item 9. SR 3.3.3.3 only applies to Item 9.

SR 3.3.3.1

Performance of the CHANNEL CHECK once every 31 days ensures that a gross instrumentation failure has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the two instrument channels could be an indication of excessive instrument drift in one of the channels or of something even more serious. A CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying the instrumentation continues to operate properly between each CHANNEL CALIBRATION. The high radiation instrumentation should be compared to similar unit instruments located throughout the unit.

Agreement criteria are determined by the unit staff, based on a combination of the channel instrument uncertainties, including isolation, indication, and readability. If a channel is outside the criteria, it may be an indication that the sensor or the signal processing equipment has drifted outside its limit. If the channels are within the criteria, it is an indication that the channels are OPERABLE.

As specified in the SR, a CHANNEL CHECK is only required for those channels that are normally energized.

Prairie Island Units 1 and 2

B 3.3.3-18

SURVEILLANCE REQUIREMENTS

<u>SR 3.3.3.1</u> (continued)

The Frequency of 31 days is based on operating experience that demonstrates that channel failure is rare. The CHANNEL CHECK supplements less formal, but more frequent, checks of channels during normal operational use of the displays associated with the LCO required channels.

SR 3.3.3.2

A CHANNEL CALIBRATION is performed every 24 months, or approximately at every refueling. CHANNEL CALIBRATION is a complete check of the instrument loop, including the sensor. The test verifies that the channel responds to the measured parameter with the necessary range and accuracy. This SR is modified by a Note that excludes neutron detectors.

The Frequency is based on operating experience and consistency with the typical PI refueling cycle.

SR 3.3.3.3

This SR is the performance of a TADOT for the Penetration Flow Path Automatic Containment Isolation Valve Position every 24 months.

The Frequency of every 24 months is adequate based on operating experience, reliability, and consistency with the typical PI refueling cycle.

The SR is modified by a Note that excludes verification of setpoints from the TADOT. The Functions affected have no setpoints associated with them.

Prairie Island Units 1 and 2

B 3.3.3-19

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BASES (continued)

REFERENCES 1. USAR Section 7.10.

2. Regulatory Guide 1.97, Revision 2.

3. NRC approved LAR 121 dated November 9, 1995.

B 3.3 INSTRUMENTATION

B 3.3.4 4 kV Safeguards Bus Voltage Instrumentation

BASES

BACKGROUND

The Diesel Generators (DGs) provide a source of emergency power when offsite power is either unavailable or is insufficiently stable to allow safe unit operation. Redundant offsite power sources ensure an available source of offsite power to the Engineered Safety Features when one offsite path becomes unavailable. Undervoltage protection, via load sequencers, will provide voltage and load restoration, including DG start if an undervoltage (UV) or degraded voltage (DV) condition occurs at the 4 kV safeguards buses. There are two trains of load sequencers and UV and DV signals, one train for each 4 kV safeguards bus. These features are described in the USAR (Ref. 1).

Eight voltage relays provide input to the load sequencer for each 4 kV safeguards bus for detecting a sustained DV, approximately 95% of 4160V, or a UV, approximately 75% of 4160V, condition. The relay inputs are paired in the load sequencer into two DV and two UV channels. Either channel initiates the DV or UV function. Time delays are applied within the UV and DV functions to prevent actuation during normal transients. A DG start time delay is also provided in the DV function to allow the condition to be corrected by external actions within a time period that will not cause damage to operating equipment.

The load sequencer provides a DG start signal from the UV function if neither offsite path is available. The DV function provides a DG start signal and transfers the bus from the grid to the DG. Load rejection and load restoration sequencing is actuated by an SI signal input, or when the bus is being automatically transferred. The load sequencer is considered to be a support system to the associated DG. An inoperable load sequencer would not allow the associated DG to

the referenced setpoint methodology (as-left criteria).	BASES	
The trip setpoints used in the relays are based on the plant specific voltage analysis discussed in the USAR (Ref. 1). The Allowable Value in conjunction with the trip setpoint and LCO establishes the threshold for protective action to ensure that the consequences of Design Basis Accidents (DBA's), in coincidence with offsite power unavailability or instability, will be acceptable. The Allowable Value is considered a limiting value such that a channel is OPERABLE if the measured setpoint is found not to exceed the Allowable Value during the CHANNEL OPERATIONAL TEST (COT). Note that, although a channel is OPERABLE under these circumstances, the setpoint must be left adjusted to within the established calibration tolerance band of the trip setpoint in accordance with the uncertainty assumptions stated in the referenced setpoint methodology (as-left criteria). Setpoints adjusted consistent with the requirements of the Allowable Values provide a conservative margin with regard to instrument uncertainties to ensure that the consequences of DBAs will be acceptable, providing the unit is operated from within the LCOs at the onset of the accident and that the equipment functions as designed. Allowable Values are specified as applicable for each Function in SR 3.3.4.2. Trip setpoints are also specified in the unit specific		However, when a load sequencer is inoperable, the associated DG can still be manually started and loaded, thus providing its intended
 voltage analysis discussed in the USAR (Ref. 1). The Allowable Value in conjunction with the trip setpoint and LCO establishes the threshold for protective action to ensure that the consequences of Design Basis Accidents (DBA's), in coincidence with offsite power unavailability or instability, will be acceptable. The Allowable Value is considered a limiting value such that a channel is OPERABLE if the measured setpoint is found not to exceed the Allowable Value during the CHANNEL OPERATIONAL TEST (COT). Note that, although a channel is OPERABLE under these circumstances, the setpoint must be left adjusted to within the established calibration tolerance band of the trip setpoint in accordance with the uncertainty assumptions stated in the referenced setpoint methodology (as-left criteria). Setpoints adjusted consistent with the requirements of the Allowable Values provide a conservative margin with regard to instrument uncertainties to ensure that the consequences of DBAs will be acceptable, providing the unit is operated from within the LCOs at the onset of the accident and that the equipment functions as designed. Allowable Values are specified as applicable for each Function in SR 3.3.4.2. Trip setpoints are also specified in the unit specific 		Allowable Values and Trip Setpoints
 establishes the threshold for protective action to ensure that the consequences of Design Basis Accidents (DBA's), in coincidence with offsite power unavailability or instability, will be acceptable. The Allowable Value is considered a limiting value such that a channel is OPERABLE if the measured setpoint is found not to exceed the Allowable Value during the CHANNEL OPERATIONAL TEST (COT). Note that, although a channel is OPERABLE under these circumstances, the setpoint must be left adjusted to within the established calibration tolerance band of the trip setpoint in accordance with the uncertainty assumptions stated in the referenced setpoint methodology (as-left criteria). Setpoints adjusted consistent with the requirements of the Allowable Values provide a conservative margin with regard to instrument uncertainties to ensure that the consequences of DBAs will be acceptable, providing the unit is operated from within the LCOs at the onset of the accident and that the equipment functions as designed. Allowable Values are specified as applicable for each Function in SR 3.3.4.2. Trip setpoints are also specified in the unit specific 		• • • • • • •
 Values provide a conservative margin with regard to instrument uncertainties to ensure that the consequences of DBAs will be acceptable, providing the unit is operated from within the LCOs at the onset of the accident and that the equipment functions as designed. Allowable Values are specified as applicable for each Function in SR 3.3.4.2. Trip setpoints are also specified in the unit specific 		 establishes the threshold for protective action to ensure that the consequences of Design Basis Accidents (DBA's), in coincidence with offsite power unavailability or instability, will be acceptable. The Allowable Value is considered a limiting value such that a channel is OPERABLE if the measured setpoint is found not to exceed the Allowable Value during the CHANNEL OPERATIONAL TEST (COT). Note that, although a channel is OPERABLE under these circumstances, the setpoint must be left adjusted to within the established calibration tolerance band of the trip setpoint in accordance with the uncertainty assumptions stated in
SR 3.3.4.2. Trip setpoints are also specified in the unit specific		uncertainties to ensure that the consequences of DBAs will be acceptable, providing the unit is operated from within the LCOs at the onset of the accident and that the equipment functions as
		SR 3.3.4.2. Trip setpoints are also specified in the unit specific

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BACKGROUND Allowable Values and Trip Setpoints (continued)

ensure that the setpoint measured by the surveillance procedure does not exceed the Allowable Value if the relay is performing as required. If the measured setpoint does not exceed the Allowable Value, the relay is considered OPERABLE. Operation with a measured setpoint less conservative than the specified trip setpoint, but within the Allowable Value, is acceptable provided that operation and testing is consistent with the assumptions of the unit specific setpoint calculation. Each Allowable Value specified is conservative with respect to the values assumed in the analyses described in Reference 1 in order to account for instrument uncertainties appropriate to the trip function. These uncertainties are defined in Reference 2.

APPLICABLE SAFETY ANALYSES

The 4 kV safeguards bus voltage instrumentation is required for the Engineered Safety Features (ESF) Systems to function in any accident with a loss of offsite power. Its design basis is that of the ESF Actuation System (ESFAS).

Accident analyses credit the loading of the DG based on the loss of offsite power during a small break loss of coolant accident (LOCA). The actual DG start has historically been associated with the ESFAS actuation. The DG loading has been included in the delay time associated with each safety system component requiring DG supplied power following a loss of offsite power. The analyses assume a non-mechanistic DG loading, which does not explicitly account for each individual component of loss of power detection and subsequent actions.

The required 4 kV safeguards bus voltage instrumentation, in conjunction with the ESF systems powered from the DGs, provide

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BASES	
APPLICABLE SAFETY ANALYSES (continued)	unit protection in the event of any of the analyzed accidents discussed in Reference 3, in which a loss of offsite power is assumed.
	The delay times assumed in the safety analysis for the ESF equipment include the 10 second DG start delay, and the appropriate sequencing delay, if applicable.
	The 4 kV safeguards bus voltage instrumentation satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii).
LCO	The LCO for 4 kV safeguards bus voltage instrumentation requires that two channels per bus of both the UV and DV Functions, and two trains of automatic load sequencers, shall be OPERABLE in MODES 1, 2, 3, and 4. In MODES 5 and 6, the two channels and the associated load sequencer must be OPERABLE whenever the associated DG is required to be OPERABLE to ensure that the automatic start of the DG is available when needed. Loss of the 4 kV Safeguards Bus Voltage Instrumentation Function could result is the delay of safety systems initiation when required. This could lea to unacceptable consequences during accidents.
	A channel is OPERABLE with a trip setpoint outside its calibration tolerance band provided the trip setpoint "as-found" value does not exceed its associated Allowable Value and provided the trip setpoin "as-left" value is adjusted to within the calibration tolerance band.
APPLICABILITY	The 4 kV Safeguards Bus Voltage Instrumentation Functions are required in MODES 1, 2, 3, and 4 because ESF Functions are designed to provide protection in these MODES. Actuation in MODE 5 or 6 is required whenever the required DG must be OPERABLE so that it can perform its function on an UV or degraded power to the safeguards bus.

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BASES (continued)

ACTIONS

In the event a channel's trip setpoint is found nonconservative with respect to the Allowable Value, or the channel is found inoperable, then the function that channel provides must be declared inoperable and the LCO Condition entered for the particular protection function affected.

Because the required channels are specified on a per bus basis, the Condition may be entered separately for each bus as appropriate.

A Note has been added in the ACTIONS to clarify the application of Completion Time rules. The Conditions of this Specification may be entered independently for each Function listed in the LCO. The Completion Time(s) of the inoperable channel(s) of a Function will be tracked separately for each Function starting from the time the Condition was entered for that Function.

<u>A.1</u>

Condition A applies to the 4 kV safeguards bus voltage Function with one UV or one DV or both (one UV and one DV) channel(s) per bus inoperable.

If one channel is inoperable, Required Action A.1 requires that channel to be placed in bypass within 6 hours. With a channel in bypass, the remaining 4 kV safeguards bus voltage instrumentation channel provides UV or DV Function initiation.

The specified Completion Time and time allowed for bypassing one channel are reasonable considering the Function will operate on every bus and the low probability of an event occurring during these intervals.

ACTIONS

(continued)

<u>B.1</u>

Condition B applies in MODES 1, 2, 3, or 4 when Required Action and associated Completion Time of Condition A is not met, when Functions a or b or both with two channels per bus are inoperable, or when one required load sequencer is inoperable.

Required Action B.1 requires the performance of SR 3.3.4.1 for the OPERABLE automatic load sequencer. The 6 hour Completion Time provides a reasonable time for performance of the SR. Performance of this SR on a more frequent basis, once per 24 hours thereafter, ensures that the OPERABLE load sequencer remains OPERABLE while in this Condition. If the redundant train load sequencer fails to pass the SR it is inoperable and Condition D must then be entered.

B.2 and B.3

To ensure a highly reliable power source remains with an inoperable load sequencer, the offsite paths for the associated 4 kV safeguards bus must be capable of accepting the block loading that could result from an SI signal and availability must be verified on a more frequent basis. The 8 hour Completion Time is consistent with the Completion Time for an inoperable 4 kV safeguards bus, as required in LCO 3.8.9, "Distribution Systems - Operating." The verification of the operability of the offsite paths for associated 4kV safeguards on a more frequent basis, once per 8 hours thereafter, ensures that the OPERABLE paths remain OPERABLE while in this Condition.

An inoperable load sequencer results in associated DG unavailability for automatic start, connection to the bus and load reception. In Condition B, the remaining OPERABLE DG and offsite paths are adequate to supply electrical power to the onsite Safeguards AC Distribution System.

ACTIONS B.2 and B.3 (continued)

Offsite power block loading capability is established by administrative control of selected distribution system loads to reduce potential starting inrush.

<u>B.4</u>

Required Action B.4 requires that the automatic load sequencer be restored to OPERABLE status. The 7 day Completion Time allows a reasonable time to repair the inoperable load sequencer. The Completion Time is consistent with the Completion Time to restore an inoperable DG, as required in LCO 3.8.1, "AC Sources -Operating."

<u>C.1</u>

Condition C applies when the Required Action and associated Completion Time of Condition B are not met. The unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours.

<u>D.1</u>

Required Action D.1 requires that LCO 3.8.2 "AC Sources-Shutdown" Condition(s) and Required Action(s) for the associated DG be entered immediately when Required Action and Completion Time of Condition A is not met, or Functions a and b or both with two channels per bus inoperable, or when one required automatic

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B 3.3.4-7

ACTIONS

D.1 (continued)

load sequencer is inoperable in MODE 5 or 6. The Completion Time of immediately is consistent with the required times for actions requiring prompt attention. The restoration of the required AC electrical power sources should be completed as quickly as possible in order to minimize the time during which the unit safety systems may be without sufficient power.

SURVEILLANCE REQUIREMENTS

<u>SR 3.3.4.1</u>

SR 3.3.4.1 is the performance of a COT every 31 days.

A COT is performed on each required voltage relay channel and automatic load sequencer to ensure they will perform the intended function. For these tests, the relay trip setpoints are verified and adjusted as necessary. The Frequency is based on the known reliability of the relays and load sequencers and the multichannel redundancy available, and has been shown to be acceptable through operating experience.

SR 3.3.4.2

SR 3.3.4.2 is the performance of a CHANNEL CALIBRATION.

The setpoints, as well as the response to a UV and a DV test, shall include a single point verification that an actuation occurs within the required time delay, as shown in Reference 1.

A CHANNEL CALIBRATION is performed every 24 months, or approximately at every refueling. CHANNEL CALIBRATION is a

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B 3.3.4-8

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BASES	
SURVEILLANCE REQUIREMENTS	<u>SR 3.3.4.2</u> (continued)
	complete check of the voltage relay channel. The test verifies that the channel responds to a measured parameter within the necessary range and accuracy.
	The Frequency of 24 months is based on operating experience and consistency with the typical PI refueling cycle and is justified by the assumption of a 24 month calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis.
REFERENCES	1. USAR, Section 8.4.
	 "Engineering Manual Section 3.3.4.1, Engineering Design Standard for Instrument Setpoint/Uncertainty Calculations".
	3. USAR, Section 14.
e	

B 3.3 INSTRUMENTATION

B 3.3.5 Containment Ventilation Isolation Instrumentation

BASES

BACKGROUND Containment ventilation isolation (CVI) instrumentation closes the containment isolation valves in the Containment Inservice (low flow) Purge System. This action isolates the containment atmosphere from the environment to minimize releases of radioactivity in the event of an accident. The Containment Inservice (low flow) Purge System may be in use during reactor operation and with the reactor shutdown.

> Containment ventilation isolation initiates on a safety injection (SI) signal, by manual actuation of containment isolation, or by manual actuation of containment spray. The Bases for LCO 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation," discuss these modes of initiation.

> Three radiation monitoring channels are also provided as input to CVI. One channel measures gaseous radiation in containment exhaust air. This channel provides an input to one train of CVI actuation relay logic. The other two channels measure either gaseous or particulate containment exhaust air radiation. These two channels provide inputs to the other train of CVI actuation relay logic where either channel will actuate the train. These three detectors will respond to most events that release radiation to containment. Since the monitors constitute a sampling system, various components such as sample line valves and sample pumps are required to support monitor OPERABILITY.

The Containment Inservice (low flow) Purge System has two containment isolation valves on each supply and exhaust line. A high radiation signal from any one of the three channels initiates one train of CVI logic, which closes one supply and one exhaust containment isolation valve in the Containment Inservice (low flow) Purge System. This system is described in the Bases for LCO 3.6.3, "Containment Isolation Valves."

BASES (continued)

APPLICABLE The safety analyses assume that the containment remains SAFETY intact with penetrations unnecessary for core cooling isolated early ANALYSES in the event. The isolation of the purge valves has not been analyzed mechanistically in the dose calculations, although its rapid isolation is assumed. The containment exhaust air radiation monitors act as backup to the SI signal to ensure closing of the purge and exhaust valves. They are also the primary means for automatically isolating containment in the event of a fuel handling accident during shutdown. Containment isolation in turn ensures meeting the containment leakage rate assumptions of the safety analyses, and ensures that the calculated accidental offsite radiological doses are below 10 CFR 100 (Ref. 1) limits.

The CVI instrumentation satisfies Criterion 3 of 10 CFR 50.36 (c)(2)(ii).

The LCO requirements ensure that the instrumentation necessary to initiate CVI, listed in Table 3.3.5-1, is OPERABLE.

1. Manual Initiation

The LCO requires two channels OPERABLE. The operator can initiate CVI at any time by using either of two switches in the control room. This action will cause actuation of one train of Containment Inservice (low flow) Purge System containment isolation valves in the same manner as any of the automatic actuation signals.

The LCO for Manual Initiation ensures the proper amount of redundancy is maintained in the manual actuation circuitry to ensure the operator has manual initiation capability.

Each channel consists of one switch and the interconnecting wiring to the valves.

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LCO

LCO	2.	Automatic Actuation Relay Logic
(continued)		The LCO requires two trains of CVI relay logic OPERABLI to ensure that no single random failure can prevent automati actuation.
		The CVI Automatic Actuation Relay Logic consists of the same features and operate in the same manner as described the ESFAS Function 1.b, SI, and ESFAS Function 3.b, Containment Isolation. The applicable MODES and specific conditions for the CVI portion of these Functions are different and less restrictive than those for their containment isolation and SI roles. If one or more of the SI or containment isolation Functions becomes inoperable in such a manner that only the CVI Function is affected, the Conditions applicable to their and containment isolation Functions need not be entered. The less restrictive Actions specified for inoperability of the CVI Functions specify sufficient compensatory measures for this case.
	3.	High Radiation in Exhaust Air
		The LCO specifies two required trains of radiation monitors ensure that the radiation monitoring instrumentation necessa to initiate CVI remains OPERABLE.
		For sampling systems, channel OPERABILITY involves mo than OPERABILITY of the channel electronics. OPERABILITY may also require correct valve lineups, and sample pump operation as well as detector OPERABILITY, these supporting features are necessary for trip to occur und the conditions assumed by the safety analyses.

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B 3.3.5-3

LCO	4.	Manual Containment Isolation
(continued)		Refer to LCO 3.3.2, Function 3.a., for all initiating Functions and requirements.
	5.	Safety Injection
		Refer to LCO 3.3.2, Function 1, for all initiating Functions and requirements.
	6.	Manual Containment Spray
		Refer to LCO 3.3.2, Function 2, for all initiating Functions and requirements.
APPLICABILITY	MO Purg Aut	Functions in Table 3.3.5-1 are required to be OPERABLE in DES 1, 2, 3, and 4 when the Containment Inservice (low flow) ge System is not isolated. In addition, the Manual Initiation, omatic Actuation Relay Logic, and High Radiation in Exhaust Functions are required OPERABLE during CORE
	ALT cont Syst for a cont	Functions are required OPERABLE during CORE FERATIONS or movement of irradiated fuel assemblies within tainment, when the Containment Inservice (low flow) Purge tem is not isolated. Under these conditions, the potential exists an accident that could release fission product radioactivity into tainment. Therefore, the CVI instrumentation must be ERABLE in these MODES.

BASES (continued)

ACTIONS

The most common cause of channel inoperability is outright failure or drift of the process module sufficient to exceed the tolerance allowed by unit specific calibration procedures. Typically, the drift is found to be small and results in a delay of actuation rather than a total loss of function. This determination is generally made during the performance of a COT, when the process instrumentation is set up for adjustment to bring it within specification. If the trip setpoint is less conservative than the Allowable Value, the channel must be declared inoperable immediately and the appropriate Condition entered.

A Note has been added to the ACTIONS to clarify the application of Completion Time rules. The Conditions of this Specification may be entered independently for each Function listed in Table 3.3.5-1. The Completion Time(s) of the inoperable channel(s)/train(s) of a Function will be tracked separately for each Function starting from the time the Condition was entered for that Function.

<u>A.1</u>

Condition A applies to the failure of one CVI radiation monitor train. The 4 hours allowed to restore the affected train is justified by the low likelihood of events occurring during this interval, and recognition that the remaining train will respond to events.

B.1 and B.2

Condition B applies to all CVI Functions and addresses the train orientation for these Functions.

If a train is inoperable, or the Required Action and associated Completion Time of Condition A are not met, operation may continue as long as the Required Action to place and maintain

Prairie Island Units 1 and 2

B 3.3.5-5

ACTIONS B.1 and B.2 (continued)

containment inservice (low flow) purge valves in the closed position is met, or the Required Action for the applicable Conditions of LCO 3.6.3 is met for each valve made inoperable by failure of isolation instrumentation.

A Note is added stating that Condition B is only applicable in MODE 1, 2, 3, or 4.

C.1 and C.2

Condition C applies to all CVI Functions and addresses the train orientation for these Functions. If a train is inoperable, or the Required Action and associated Completion Time of Condition A are not met, operation may continue as long as the Required Action to place and maintain containment inservice (low flow) purge and exhaust isolation valves in their closed position is met or the applicable Conditions of LCO 3.9.4, "Containment Penetrations," are met for each valve made inoperable by failure of isolation instrumentation. The Completion Time for these Required Actions is Immediately.

A Note states that Condition C is only applicable during CORE ALTERATIONS and during movement of irradiated fuel assemblies within containment.

SURVEILLANCE REQUIREMENTS

A Note has been added to the SR Table to clarify that Table 3.3.5-1 determines which SRs apply to which CVI Functions.

SURVEILLANCE REQUIREMENTS (continued)

<u>SR 3.3.5.1</u>

Performance of the CHANNEL CHECK once every 12 hours ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the two instrument channels could be an indication of excessive instrument drift in one of the channels or of something even more serious. A CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying the instrumentation continues to operate properly between each CHANNEL CALIBRATION.

Agreement criteria are determined by the unit staff, based on a combination of the channel instrument uncertainties, including indication and readability. If a channel is outside the criteria, it may be an indication that the sensor or the signal processing equipment has drifted outside its limit.

The Frequency is based on operating experience that demonstrates channel failure is rare. The CHANNEL CHECK supplements less formal, but more frequent, checks of channels during normal operational use of the displays associated with the LCO required channels.

<u>SR 3.3.5.2</u>

SR 3.3.5.2 is the performance of an ACTUATION LOGIC TEST. This test is performed every 31 days on a STAGGERED TEST BASIS. The Surveillance interval is acceptable based on instrument reliability and industry operating experience.

Prairie Island Units 1 and 2

B 3.3.5-7

12/11/00

SURVEILLANCE SR 3.3.5.3

REQUIREMENTS (continued)

A COT is performed every 31 days on each required channel to ensure the entire channel will perform the intended Function. The setpoint shall be left consistent with the current unit specific procedure tolerance.

<u>SR 3.3.5.4</u>

SR 3.3.5.4 is the performance of a TADOT. This test is a check of the Manual Initiation Function and is performed every 24 months.

The SR is modified by a Note that excludes verification of setpoints during the TADOT. The Functions tested have no setpoints associated with them.

The Frequency is based on the known reliability of the Function and the redundancy available, and has been shown to be acceptable through operating experience.

SR 3.3.5.5

A CHANNEL CALIBRATION is performed every 24 months, or approximately at every refueling. CHANNEL CALIBRATION is a complete check of the instrument loop, including the sensor. The test verifies that the channel responds to a measured parameter within the necessary range and accuracy.

The Frequency is based on operating experience and is consistent with the typical PI refueling cycle.

REFERENCES 1. 10 CFR 100.11.

PACKAGE 3.3

INSTRUMENTATION

PART C

MARKUP OF PRAIRIE ISLAND CURRENT TECHNICAL SPECIFICATIONS

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2	TS.2.3-2	38	Table TS.3.5-2B (Page 9 of 9) (Overflow)
2 3 4	TS.2.3-3	39	TS.3.6-2
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18	Table TS.3.5-2A (Page 5 of 6)	54	Table TS.4.1-1A (Page 4 of 5) (Overflow)
19	Table TS.3.5-2A (Page 5 of 6) (Overflow)	55	Table TS.4.1-1A (Page 5 of 5)
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30	Table TS.3.5-2B (Page 5 of 9)	66	Table TS.4.1-1C (Page 1 of 4)
31	Table TS.3.5-2B (Page 5 of 9) (Overflow)	67	Table TS.4.1-1C (Page 1 of 4) (Overflow)
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PRAIRIE ISLAND NUCLEAR GENERATING PLANT UNITS 1 AND 2

Improved Technical Specifications Conversion Submittal 2.3 LIMITING SAFETY SYSTEM SETTINGS, PROTECTIVE INSTRUMENTATION

Applicability

Applies to trip settings for instruments monitoring reactor power and reactor coolant pressure, temperature, flow, and pressurizer level.

A3.3-01

Objective

To provide for automatic protective action in the event that the principal process variables approach a safety limit.

Specification

A. Protective instrumentation settings for reactor trip shall be as follows:

1. Startup protection

High flux, intermediate range (high set point) - current equivalent to ≤ 40 % of RATED THERMAL POWER.

Tbl 3.3.1-1 Function 2b	b.
Tbl 3.3.1-1 Function 5	c.

Tbl 3.3.1-1

Function 8a

Tbl 3.3.1-1 Function 6

and Note 1

High flux, power range (low set point) - <40% of RATED THERMAL POWER.

c. High flux, source range neutron flux <10⁶ counts/second.

2. Core protection

Tbl 3.3.1-1 Function 2a	High flux, power range (high set point) - ≤ 110108 of RATED THERMAL POWER.	L3.3-31
Tbl 3.3.1-1 Function 8b b.	High pressurizer pressure - <u><</u> 2400 <mark>2385</mark> psig.	L3.3-31

c. Low pressurizer pressure - >17601815 psig.

d. Overtemperature ΔT

$$\Delta T_{t} \leq \Delta T_{0} [K_{1} - K_{2} (T - T') (\frac{1 + t_{1}s}{1 + t_{2}s}) + K_{3} (P - P') - f (\Delta I)]$$

where

 ΔT_{o} Indicated AT at RATED THERMAL POWER = т = Average temperature, oF 771 567.3°F Ρ Pressurizer pressure, psig = P' psig 2235 = 1.11 K1 ≤ 0.0090 K_2 = K, 0.000566

 $t_1 = 30 \, \text{sec}$

= 4 sec

L3.3-31

	<u> </u>

2.3.A.2.d Cont.

Tbl	3.3.1	-1
Func	ction	6
and	Note	1

and f (Δ I) is a function of the indicated difference between top and bottom detectors of the power-range nuclear ion chamber, with gains to be selected based on measured instrument response during plant startup tests, such that where q_t and q_b are the percent power in the top and bottom halves of the core, respectively, and $q_t + q_b$ is total core power in percent of rated power:

- 1. for $q_t q_b$ within -12% and +9%, f (ΔI) = 0, and
- 2. for each percent that the magnitude of $q_t q_b$ exceeds +9% the ΔT trip set point shall be automatically reduced by an equivalent of 2.5 percent of RATED THERMAL POWER.
- 3. for each percent that the magnitude of $q_t q_b$ exceeds -12%, the ΔT trip set point shall be automatically reduced by an equivalent of 1.5 percent of RATED THERMAL POWER.

Tbl 3.3.1-1 Function 7 and Note 2 Overpower ΔT $K_5 t_3 sT$ $\Delta^T p \leq \Delta^T o \left[\kappa_4 - \frac{1}{2} - \kappa_6 (T-T') - f(\Delta I) \right]$ $1 + t_3 s$

where

e.

$\Delta^{\mathbf{T}_{\mathbf{o}}}$	=	Indicated ΔT at RATED THERMAL POWER
т	=	Average temperature, °F
Т'	=	567.3°F
K4	_	1.10
K5	=	0.0275 for increasing T; 0 for decreasing T
K ₆	=	0.002 for $T > T'$, 0 for $T < T'$
t ₃	=	10 sec
$f(\Delta I)$	=	as defined in d. above
Town		tor coolant flow nor loop - 191908 of normal

Tbl 3.3.1-1 f. Function 10

Low reactor coolant flow per loop - >9190% of normal indicated loop flow as measured at loop elbow tap.

L3.3-31

<u> </u>	
Tbl 3.3.1-1	
Function 12	
Tbl 3.3.2-1	
Function 6d	
·	Reactor coolant pump bus undervoltage - >7675% of normal voltage L3.3-31
Tbl 3.3.1-1 h. Function 11a	Open reactor coolant pump motor breaker.
Tbl 3.3.1-1 Function 11b	Reactor coolant pump bus underfrequency - <u>></u> 58.2 Hz
<u> </u>	Power range neutron flux rate.
Tbl 3.3.1-1 Function 3a	1. Positive rate - ≤ 15 of RATED THERMAL POWER with a time 13.3-31 constant ≥ 2 seconds
Tbl 3.3.1-1 Function 3b	2. Negative rate - ≤ 87 % of RATED THERMAL POWER with a time L3.3-31 constant ≥ 2 seconds
3. Oth	ner reactor trips
Tbl 3.3.1-1 Function 9 a.	High pressurizer water level - ≤90% of narrow range instrument span.
Tbl 3.3.1-1 Function 13 Tbl 3.3.2-1 Function 6b	Low-low steam generator water level - ≥5% of narrow range instrument span.
c.	Turbine Generator trip
Tbl 3.3.1-1 Function 14b	1. Turbine stop valve indicators - closed
Tbl 3.3.1-1 Function 14a	2. Low auto stop oil pressure - ≥45 psig
d	-Safety-injection See-Specification 3.5 A3.3-02

2.3.B. Protective instrumentation settings for reactor trip interlocks shall be as follows:

1. P-6 Interlock: Tbl 3.3.1-1 Function 16a Source range high flux trip shall be unblocked whenever inter- A3.3-28 mediate range neutron flux is $2 \le 10^{-10}$ amperes. 2. P-7 Interlock: "At power" reactor trips that are blocked at low power (low pressurizer pressure, high pressurizer level, and loss of flow for one or two loops) shall be unblocked whenever: A3.3-28 Tbl 3.3.1-1 a. Power range neutron flux is ≥ 12 % of RATED THERMAL POWER or, Function 16b.1 Tbl 3.3.1-1 L3.3-31 Turbine load is 10% of full load turbine impulse pressure b. Function A3.3-28 16b.2 3. P-8 Interlock:

Tbl 3.3.1-1 Function 16c Low power block of single loop loss of flow is permitted whenever power range neutron flux is <u>10</u>% of RATED THERMAL POWER. L3.3-31

4. P-9 Interlock:

Tbl 3.3.1-1
Function 16dReactor trip on turbine trip shall be unblocked whenever power range
neutron flux is \$2050% of RATED THERMAL POWER.L3.3-31

5. P-10 Interlock:

Tbl 3.3.1-1 Function 16e Flux trip shall be unblocked whenever power range neutron flux is A3.3-28 Segt of RATED THERMAL POWER.

C.-Control-Rod-Withdrawal-Stops

-----a.---P-2-Interlock:

A3.3-28

LR3.3-03

3.25

3.5 INSTRUMENTATION SYSTEM

Applicability

Applies to protection system instrumentation.

Objectives

To provide for automatic initiation of the engineered safety features in the event the principal process variable limits are exceeded, and to delineate the conditions of the reactor trip and engineered safety feature instrumentation necessary to ensure reactor safety.

Specification

- A. Limiting set points for instrumentation which initiates operation of the engineered safety features shall be as stated in Table TS-3.5-1.
- B. For on-line testing or in the event of failure of a sub-system instrumentation channel, plant operation shall be permitted to continue at RATED THERMAL POWER in accordance with Tables TS.3.5-2A and TS.3.5-2B.

A3.3-01

A3.3-04

TABLE TS.3.5-1

ENGINEERED SAFETY FEATURES INITIATION INSTRUMENT LIMITING SET POINTS

Table 3.3.2-1 1 Funct 1c	High Containment Pressure (Hi)	Safety Injection*	≤4 psig
Table 3.3.2-1 Funct 2c	High Containment Pressure (Hi-Hi)	a. Containment Spray	≤23 psig
Table 3.3.2-1 Funct 4b		b. Steam Line Isolation of Both Lines	≤17 psig
Table 3.3.2-1 3 Funct 1d	Pressurizer Low Pressure	Safety Injection*	≥1760 <mark>1815</mark> psig L3.3-
Table 4 3.3.2-1 Funct le and Note b	Low Steam Line Pressure	Safety Injection* Lead Time Constant Lag Time Constant	≥500 psig ≥12 seconds ≤2 seconds
Table 5 3.3.2-1 Funct 4c 4c	High Steam Flow in a Steam Line Coincident with Safety Injection and Low T _{avg}	Steam Line Isolation of-Affected Line	A3.3- d/p_corresponding_to <0.745_x_10 ⁴ _lb/hr at_1005_psig >542540 F

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TABLE (OVOTELOW)

Table 3.3.2-1 Funct 4d	6 High-high Steam Flow in a Steam Line Coincident with Safety Injection		Steam Line Isolation of Affected Line	≤d/p corresponding to 4.5 x 10 ⁶ lb/hr at 735 psig
	7	High Pressure Difference Between Shield Building and Containment	Containment Vacuum - Breakers	≥0 5 psi Addressed Elsewhere
	.	High Temperature in Ventilation Ducts	Ventilation-System Isolation-Dampers	1200F
Table 3.3.5-1 Funct 3	9	High Radiation in Containment Exhaust Air	Containment Ventilation Isolation	<pre>≤count rate corresponding to 500 mrem/year whole body and 3000 mrem/year skin due to noble gases at the site boundary</pre>

*Initiates also containment isolation, feedwater line isolation and starting of all containment fans. d/p means differential pressure



TABLE TS.3.5-1 (continued)

ENGINEERED SAFETY INITIATION INSTRUMENTATION LIMITING SET POINTS

FUNCTIONAL UNIT	CHANNEL	LIMITING SET POINTS		
4KV Safeguards Busses Voltage Restoration	a. Degraded Voltage			
	Voltage (% nominal)	≥94.8% and <u><</u> 96.2%		
	Degraded voltage Time Delay 🕹	8 ± 0.5 sec M3.3-09		
	Degraded voltage DG Start Time Delay 2	8_±_0.5_to_ 60 ± 3 sec		
	b. Undervoltage	- -		
	Voltage (% nominal)	75 ± 2.5%		
	Undervoltage Time Delay	4 <u>+</u> 1.5 sec		

SR3.3.4.2

10.

SR3.3.4.2 SR3.3.4.2

SR3.3.4.2

SR3.3.4.2

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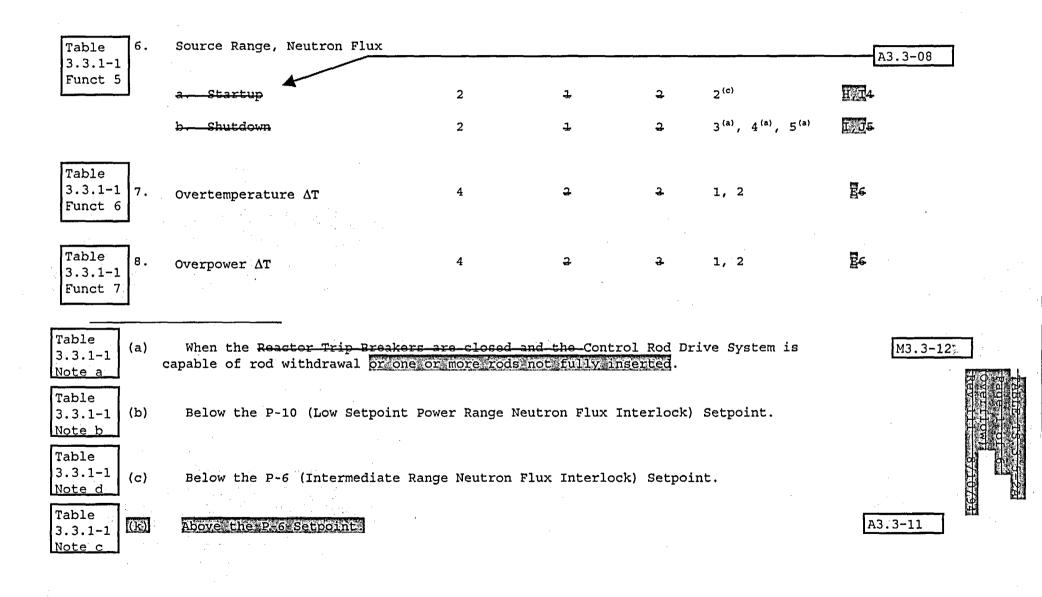
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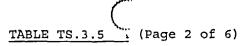
TABLE TS.3.5-2A (Page 1 of 6)

REACTOR TRIP SYSTEM INSTRUMENTATION

				REACION TRIF	SISIEM INSIR	UMENTATION				7
				[A3.3-05	1
						······			A3.3-06	1
				♥	*	*			A3.3 00]
				REQUIRED		MINIMUM				
				TOTAL NO.	CHANNELS	CHANNELS	APPLICABLE			
			FUNCTIONAL UNIT	OF_CHANNELS	TO TRIP	OPERABLE	MODES	ACTION		
	Table	I								
	3.3.1-1	1.	Manual Reactor Trip	2	1	3	1, 2	81	A3.3-07	,
	Funct 1		• • • • • • • • • • • • • • • • • • •							-
	— <u> </u>	1		2	Ŧ	2	$3^{(a)}, 4^{(a)}, 5^{(a)}$	<u>Ç</u> ə		
	dia dia 4		•							
	Table	2.	Power Range, Neutron Flux							
	3.3.1-1	-								
	Funct 2	·	a. High Setpoint	4	2	3	1, 2	<u>p</u> 2		
		4	b. Low Setpoint		2	3	1 ^(b) , 2	E-2		
			b. Low Setpoint	4	₩	*	1, 2	E ₁		
									ਵਿ	
	Table	з.	Power Range, Neutron Flux,	4	2	3	1, 2	E	, li	-TABLE-TS.
	3.3.1-1 Funct	-	High Positive Rate						L L L L L L L L L L L L L L L L L L L	
	3a									ι, μ
									8	29.4
	Table	4.	Power Range, Neutron Flux,	4	2	3.	1, 2	E-2	107	-2A
	3.3.1-1 Funct		High Negative Rate	-	-	_	-, -	a -	4 ⁶	5-3-5-2A 5f-6
	3b								•	
	Table	-	Intermediate Dense Northers				A		A3.3-11	I
•	3.3.1-1	5.	Intermediate Range, Neutron Flux	2	1	2	1 ^(b) , 2 ^(K)	F, G2	<u></u>	l
	Funct 4			4	Ŧ	Ŧ				

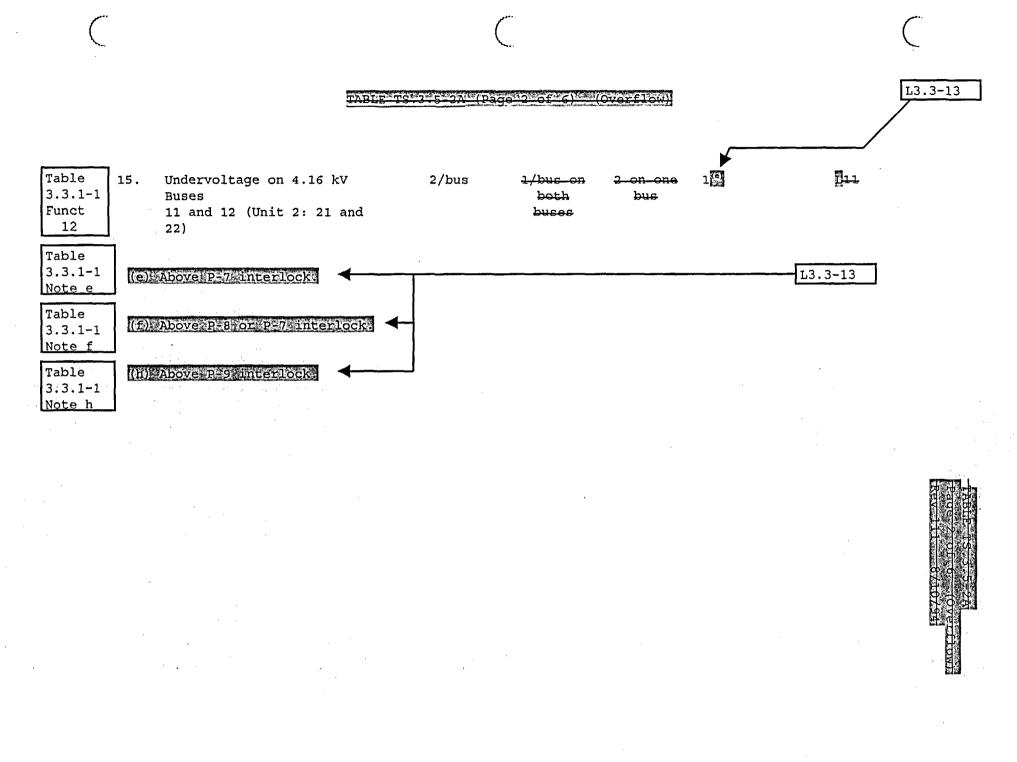
PI Current TS





REACTOR TRIP SYSTEM INSTRUMENTATION

Table	FUNCTIONAL UNIT	REQUIRED TOTAL-NO- OF-CHANNELS	CHANNELS TO TRIP	MINIMUM CHANNELS OPERABLE	APPLICABLE MODES	ACTION	
3.3.1-1 Funct 9. 8a	Low Pressurizer Pressure	4	2	3	1	K6	L3.3-13
Table 3.3.1-1 10. Funct 8b	High Pressurizer Pressure	3	2	3	1, 2	Ee	
Table 3.3.1-1 11. Funct 9	Pressurizer High Water Level	3	2	2	1	Re	L3.3-13
Table 3.3.1-1 Funct 10	Reactor Coolant Flow Low	3/Loop	2/Loop	2/Loop	1	Re	L3.3-13
Table 13.	Turbine Trip						L3.3-13
3.3.1-1 Funct	a. Low AST Oil Pressure	3	3	2	1	Ne	
	b. Turbine Stop Valve Closure	2	2	Ŧ	1	Ne	TAB Pag Rev
Table 3.3.1-1 14. Funct 13	Lo-Lo Steam Generator Water Level	3/SG	2/SG in any SG	2/SG-in each-SG	1, 2	E.	TABLE-TS.3.5-2A Paye-2 of 6 -Rev 111 8/10/94



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TABLE TS.3.5-2A (Page 3 of 6)

REACTOR TRIP_SYSTEM INSTRUMENTATION

Table 3.3.1-1 16.	<u>FUNCTIONAL UNIT</u> Loss of Reactor Coolant Pump	REQUIRED TOTAL-NO- OF-CHANNELS	CHANNELS TO TRIP	MINIMUM CHANNELS OPERABLE	APPLICABLE MODES	ACTION	
Funct 11	a. RCP Breaker Open	1/pump	1	1/pump	1	[] M1	L3.3-13
<u> </u>	b. Underfrequency 4kV bus	2/bus	l/bus on both buses	2 on one bus	15	<u>1</u> 11	
Table 3.3.1-1 17. Funct 15	Safety Injection Input from ESF	2	1	2	l, 2	₫2	
Table 3.3.1-1 Funct 19	Automatic Trip & Interlock Logic	2 2	1 1	2 2	l, 2 3 ^(a) , 4 ^(a) , 5 ^(a)	07 28 28	A3.3-19
Table 3.3.1-1 Funct 17	Reactor Trip Breakers(d)	2 2	1 1 1	2 2	1, 2 3 ^(a) , 4 ^(a) , 5 ^(a)	[/ 29 98	A3.3-14
20-	Reactor Trip Bypass Breakers	3	1	1	.(d) -		A3.3-14 M3.3-15
Table 3.3.1-1 Funct 16	Reactor Trip System						TABLE T Page 3 Rev 111
					<u></u>		S.3.5-2A of_6 8/10/94
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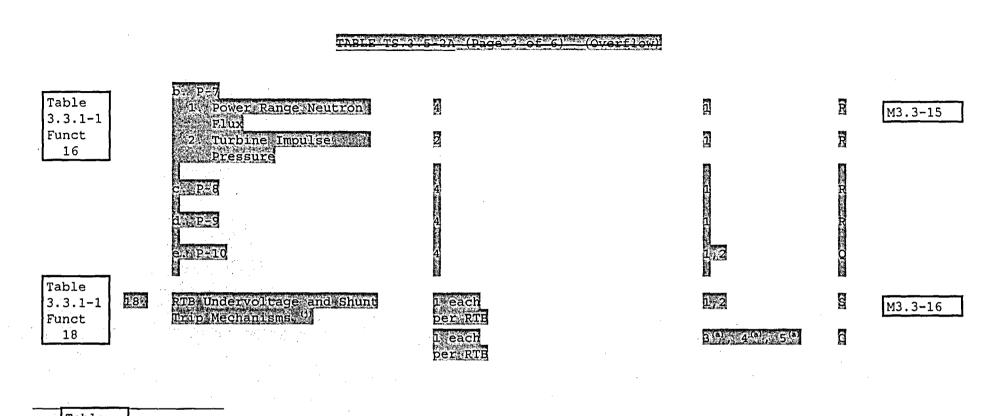


Table 3.3.1-1 (a) <u>Note a</u>	When the Reactor Trip Breakers are closed and the Control Rod Drive System is cap rod withdrawal or one or more rods not fully inserted.	pable of M3.3-12
Table 3.3.1-1 Note i	Including any when the Reactor Trip Bypass Breakers that are racked in and closed bypassing a Reactor Trip Breaker and the Control-Rod System is capable of rod withdrawal.	for A3.3-14 M3.3-17
Table 3.3.1-1 Note g	Not a direct reactor trip, underfrequency will trip the RCP breakers open.	A3.3-41
Table (()) 3.3.1-1 Note i	Only applies to breakers OPERABLE and closed	3-16

1**6**

TABLE 3.5-2A (Page 4 of 6)

Action Statements

ACTION 1: LCO3.3.1 Condition B, M	With the number of OPERABLE channels one less than the Total Number of Channels inoperable (Manual Reactor Trip channel) or RCP Breaker Position channel), restore the inoperable channel to OPERABLE status within 48 hours	A3.3-
LCO3.3.1 Condition B LCO3.3.1 Condition M ACTION 2: LCO3.3.1 Condition D, E	or be in at least MODE 3 HOT SHUTDOWN within 54the next 6 hours. or reduce THERMAL POWER to < P-7 and P-8 within 54 hours With one channel (or Power Range Neutron Flux -High). inoperable the number of OPERABLE channels less than the Total Number of Channels, operation HOT STANDBY and/or POWER OPERATION may proceed provided the following conditions are satisfied: a. The inoperable channel is placed in	A3.3- A3.3- L3.3-
LCO3.3.1 Condition D,E Note 1	 a. The inoperable channel is placed in the tripped condition within 6 hours; b. The Minimum Channels OPERABLE requirement is met; however, the inoperable channel may be bypassed for up to 4 hours for surveillance testing of other channels per Specification 4.1; and 	L3.3-2 A3.3-1

-18

A3.3-21]
A3.3-29	1
L3.3-13	

-18

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LCO3.3.1 Condition D only

> LCO3.3.1 Condition D.E Note 2

c.

If THERMAL POWER is above 85% of RATED THERMAL POWER, then determine the core quadrant power balance in accordance with the requirements of Specification 3.10.C.4.

d. One additional channel may be taken out of service for low power PHYSICS TESTS.

LC03.3.1 Condition F

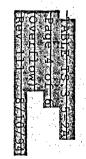
ACTION 3: With one Intermediate Range Neutron Flux channel inoperable the number of channels ODEDARLE one less than the Total Number Channels and with the THERMAL POWER level:

- the P-6 (Intermediate Range Neutron Flux Interlock) Setpoint restore the inoperable channel to OPERABLE status prior to increasing THERMAL POWER above the P-6 Setpoint
- b. Above the P-6 (Intermediate Range Neutron Flux Interlock) Setpoint but below the P-10 (Power Range Neutron Flux Interlock) Setpoint, within 24 hours, reduce THERMAL POWER < P-6 or increase THERMAL POWER > P-10 restore the inoperable channel to OPERABLE-status prior to increasing THERMAL POWER above the _P-10_Setpoint.

A3.3-18

A3.3-23

L3.3-24



PI Current TS

TARTI	-2	
LCO3.3.1 Condition G	Condition G: With two intermediate range neutron flux channels inoperable,	L3.3-25
	immediately suspend operations involving positive reactivity additions (Limited plant cooldown or boron dilution is allowed provided the change is accounted for in the calculated SDM) and within 2 hours reduce THERMAL POWER to < P-6.	L
ACTION 4: LCO3.3.1 Condition H	With the number of OPERABLE channels one Source Range Neutron, Flux channel inoperable less than the Total Number of Channels suspend all operations involving	A3.3-18
	positive reactivity additions changes (Limited plant.cooldown or boron dilution is allowed provided the change is accounted for in the calculated SDM).	L3.3-30
LCO3.3.1 Condition I	Condition 1: With two source range neutron flux channels inoperable, immediately open the Reactor Trip Breakers.	M3.3-26
ACTION 5:	With the number of OPERABLE channels one	A3.3-18
LCO3.3.1 Condition J	Source Range Neutron Flux channel inoperable less than the Total Number of Channels, suspend all operations involving positive reactivity changes,	A3.3-27
	and_restore the inoperable channel to OPERABLE status within 48 hours or within 48 hours initiate action to fully	
	insert all rods and within 49 hours <u>make</u> Rod Control System incapable of rod withdrawalopen the reactor trip breakers.	

L3.3-25

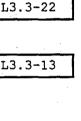
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TABLE 3.5-2A (Page 5 of 6)

Action Statements

With one the number of OPERABLE channels ACTION 6: inoperable one less than the Total LCO3.3.1 Number of Channels, HOT STANDBY and/or Condition POWER_OPERATION operation may proceed E,K,N provided the following conditions are satisfied: a. The inoperable channel is placed in the tripped condition within 6 hours on LC03.3.1 be in MODE 3 within 12 hours Condition E 67 LC03.3.1 reduce THERMAL POWER < P-7 and P-8 Condition K within 12 hours or LC03.3.1 reduce THERMAL POWER < P=9 within 1. Condition N hours, and b. The Minimum Channels OPERABLE requirement_ic_met; however, the LC03.3.1 inoperable channel may be bypassed for Condition up to 4 hours for surveillance testing E,K,N Note of other channels per Specification 4.1.

A3.3-18



L3.3-13

A3	.3-18
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ACTION 7: With the number of OPERABLE channels one

LCO3.3.1 Condition O train inoperable less than the Total Number of Channels, restore the inoperable channel to OPERABLE status within 6 hours or be in at least MODE 3 HOT SHUTDOWN within 12the next 6 hours; however, one channel may be bypassed for up to 8 hours for surveillance testing per Specification 4.1 provided the other channel is OPERABLE.

ACTION 8: LCO3.3.1 Condition C

1.4

With the number of OPERABLE channels one channel or train inoperable less than the Total Number of Channels restore the inoperable channel or train to OPERABLE status within 48 hours or within 48 hours initiate action to fully insert all rods and make the Rod Control System incapable of rod withdrawal open the reactor trip breakers within 49 the next hours.

ACTION 9: a.

LCO3.3.1 Condition S

With one of the diverse trip features
(Undervoltage or Shunt Trip
Attachment) inoperable, restore it to
OPERABLE status within 48 hours or be
in MODE 3 within 54 hours declare the
breaker inoperable and apply the
requirements of below.

	_
LC03.3.1	
Condition	Р
Note_2	

The breaker may chall not be bypassed while one of the diverse trip features is inoperable, except for A hours the time required for performing maintenance and testing to restore the diverse trip feature to OPERABLE status.

A3.3-18

A3.3-21	
A3.3-29	

A3.3-18]
A3.3-27	1
	ц _
A3.3-29	

M3.3-32



PI Current TS

LC03.3.1 Condition P

b. With one of the Reactor Trip Breakers otherwise inoperable, restorento OPERABLE status in one hour or be in at least MODE 3 HOT SHUTDOWN within 76 hours; however, one Reactor Trip Breaker may be bypassed for up to 4 hours for surveillance testing per Specification 4.1, provided the other Reactor Trip Breaker is OPERABLE.

(Overflow continued)

L3.3-33	
A3.3-21	
A3.3-29	

ACTION 10:	With-the Reactor Trip-Bypass-Breaker inoperable, restore the Reactor Trip
D3.3.1 ndition P	Bypass Breaker to OPERABLE status prior to using the Reactor Trip Bypass Breaker to bypass a Reactor Trip Breaker If the Reactor Trip Bypass Breaker is racked in and closed for bypassing a Reactor Trip Breaker and it becomes inoperable, restore to
	OPERABLE status in one hour on be in at least MODE 3 HOT SHUTDOWN within 76 hours.

5-21 (Dage 5 of 6)

LC03.3.1 Condition C

LCO3.3 Condit

> Restore the Bypass Breaker to OPERABLE status within the next 48 hours or open the Bypass Breaker within 49the following hours.

A3.3-34

L3.3-33	
A3.3-21	1
A3.3-29	



TABLE 3.5-2A (Page 6 of 6)

Action Statements

LC03.3.1 Condition L

ACTION 11: With one or both the number of OPERABLE channels on one bus inoperable less than the Total_Number_of_Channels, _POWER_OPERATION operation may proceed provided the following conditions are satisfied:

> a. The inoperable channel(s) is placed in the tripped condition within 6 hours

or reduce THERMAL POWER to < P-7 and P-6 within 12 hours, and

b. The Minimum Channels-OPERABLE requirement is met, however, the one inoperable channel (s) may be bypassed for up to 4 hours for surveillance testing of other channels per Specification 4.1.

New Condition C New Condition H New Condition

ACTION 12: NOT USED

ACTION 13: NOT USED

ACTION 14: NOT USED

A3.3-18

L3.3-13

A3.3-18

M3.3-15

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TABLE 3 5-2A (Page 6 of 6) (Overflow)

ACTION 15: NOT USED

ACTION 16: NOT USED

ACTION 17: NOT USED

ACTION 18: NOT USED

)

ACTION 19: NOT USED

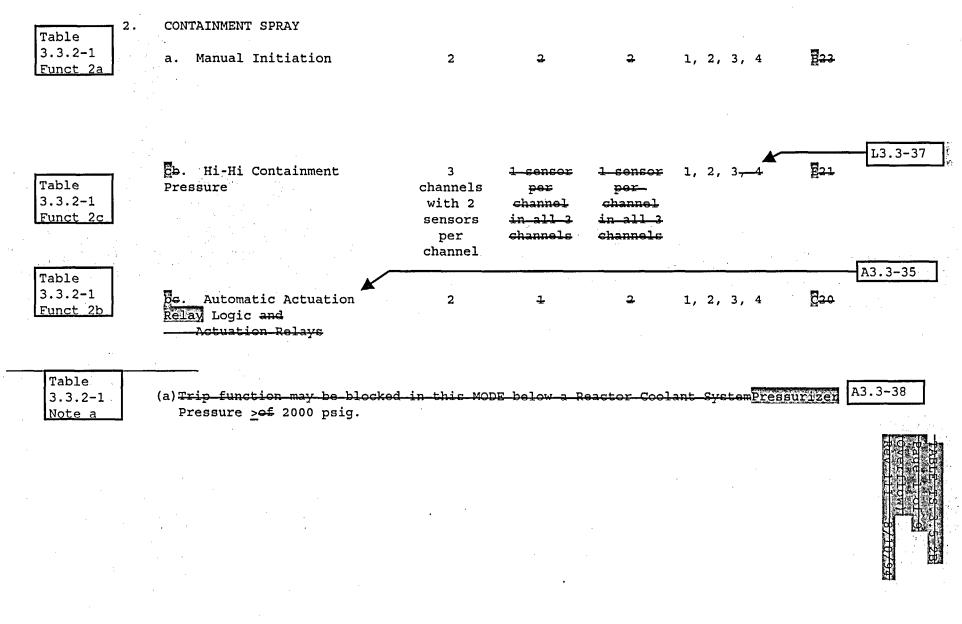
TABLE TS.3.5-2B (Page 1 of 9)

ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION

		[A3.3-05
		. ↓				A3.3-06
		REQUIRED	CHANNELS	MINIMUM CHANNELS	APPLICABLE	L
	FUNCTIONAL UNIT	NO. OF CHANNELS	TO_TRIP	OPERABLE	MODES	ACTION
1.	SAFETY INJECTION					
Table 3.3.2-1 Funct 1a	a. Manual Initiation	2	1.	3	1, 2, 3, 4	A3.3-07
Table 3.3.2-1 Funct 1c	2 5. High Containment Pressure	3	2	2	1, 2, 3, 4	L3.3-36
Table 3.3.2-1 Funct le	ge. Steam Line Low Pressure	3/Loop	2-in-any Loop	2/Loop	1, 2, 3 ^(a)	<u>D</u> 24
Table 3.3.2-1 Funct 1d	d. Pressurizer Low Pressure	3	2	2	1, 2, 3 ^(a)	D24
Table 3.3.2-1 Funct 1b	e. Automatic Actuation Relay Logic-and Actuation Relays	2	1	<u></u>	1, 2, 3, 4	<u> 명</u> 구 1
			•			TABLE TS.3.5=2B (Page 1-0f-9) REV 111-8/10/94

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TABLE TS.3.5-2B (Page 2 of 9)

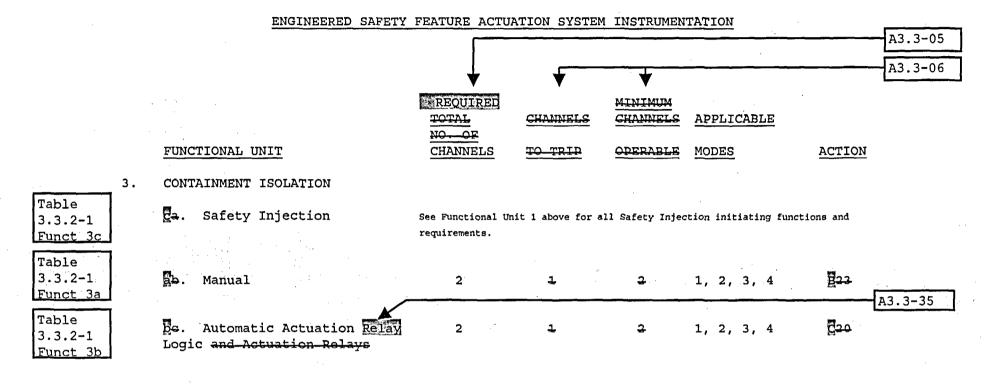


TABLE-TS:3:5-21 (Paye-2-0f-9) REV-111-8/10/9

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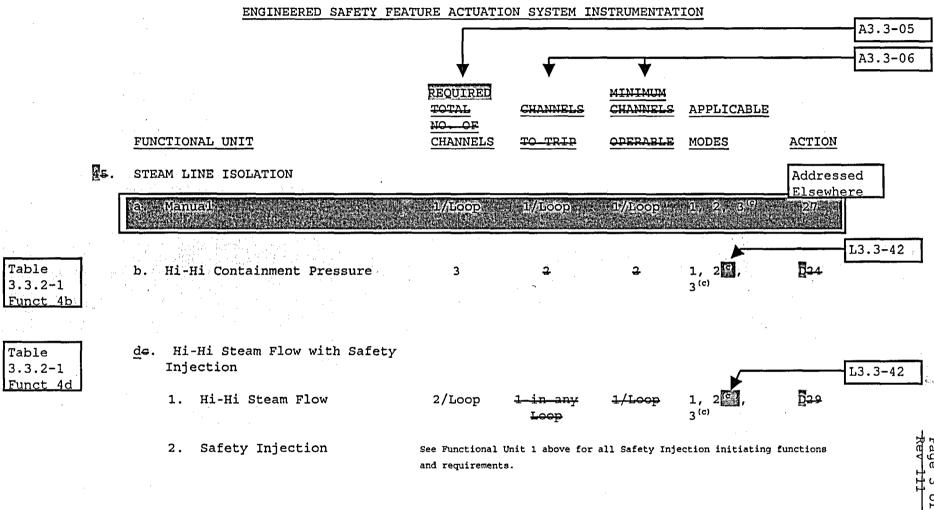
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TABLE TS 3-5-2B (Page 2 of 9) (Overflow)

able 3.5-1 inct 5		a. Safety Injection	See Functional requirements.	Unit 1 above for	all Safety In	jection initiati	ing functions and
ble 3.5-1 nct 1		Pə. Manual	2	Ŧ	2	(b)	22
ble 3.5-1 nct 6		ge. Manual Containment Spray	/ See Functional	Unit 2a above for	Manual Conta	inment Spray rec	puirements.
ble 3.5-1 nct 4	,	4. Manual Containment Isolation	See Functional	Unit 3b above for	Manual Conta	inment Isolation	ı requirements.
ble 3.5-1 nct 3	. •	E e. High Radiation in Exhaus Air	st 2	1	2	(b)	22 A3.3-
ble 3.5-1 nct 2		ZE. Automatic Actuation Relation Relation Relation Relation Relation Relays	Y 2	1	2	(b)	22
	-1	Whenever in MODES 1, 2, 3, 4					A3.3-39

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TABLE TS.3.5-2B (Page 3 of 9)



Markup for PI ITS Part C

"TABLE IS:3.5=28 -Page-3 of 9 -Rev-111 --8/10/94 TABLE TS 2 5 2B (Page 3 of 9) (Overflow)

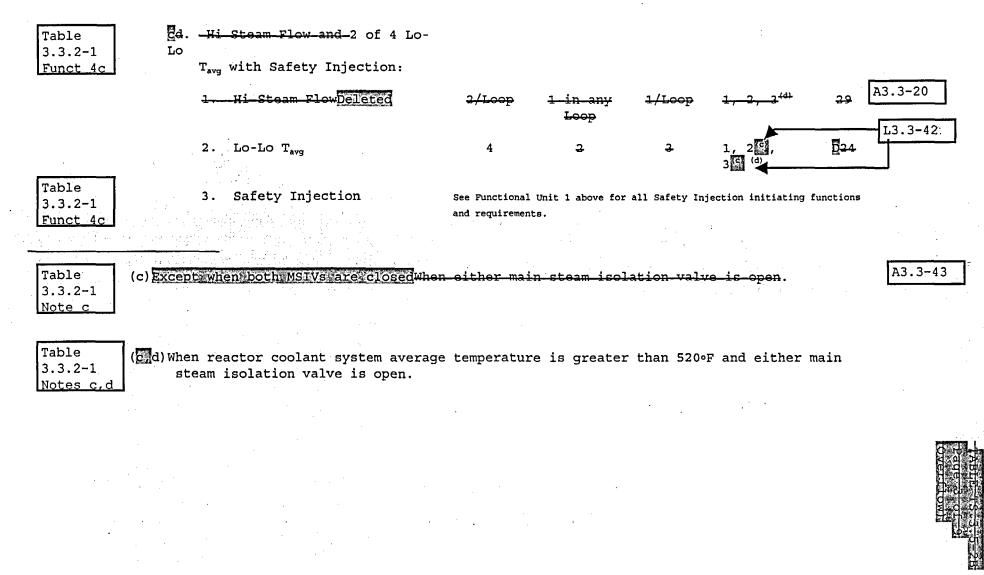


TABLE TS.3.5 [(Page 4 of 9)

ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION

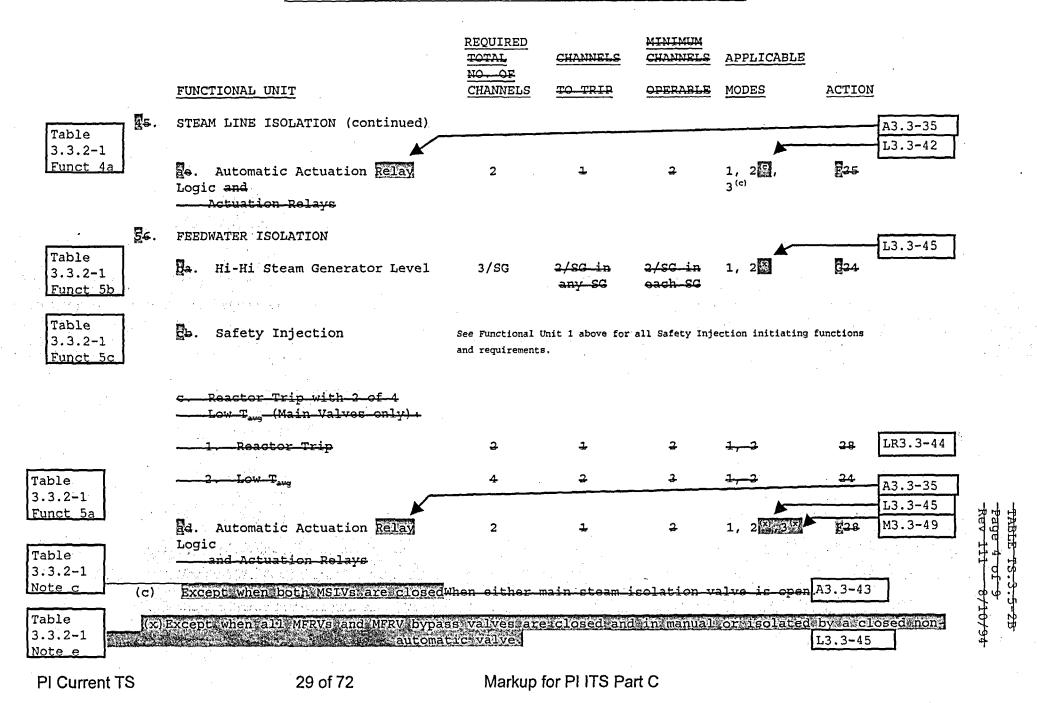


TABLE TS.3.5-2B (Page 5 of 9)

ENGINEERED SAFETY FEATURE ACTUATION TABLE INSTRUMENTATION

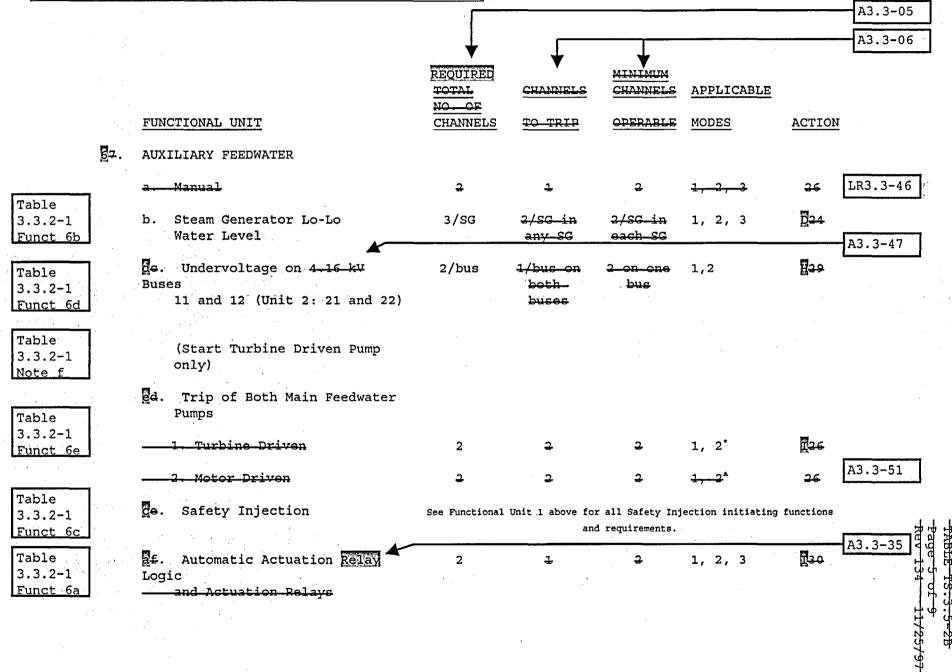


TABLE TS 3 5-2E (Page 5 of 9) (Overflow)

* This function may be by passed during alignment and operation of the AFW system for SG level

A3.3-48

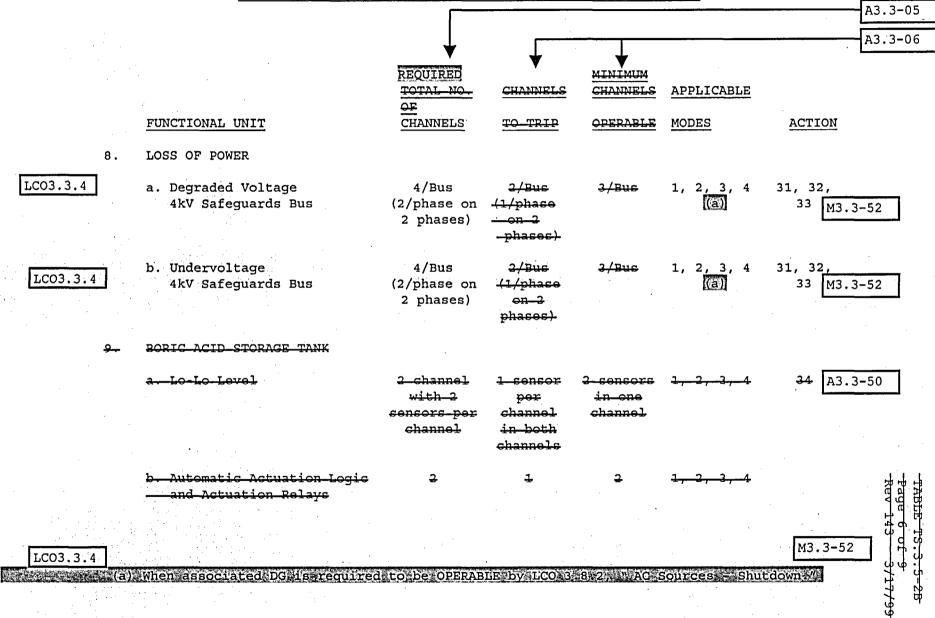
control The Auxiliary Feedwater auto start of the Turbine and Motor Driven AFW pumps caused by the Trip of Both Main Feedwater Pumps maybe bypassed during Startup and Shutdown Operations when the Main Feedwater Pumps are not required to supply feedwater to the Steam Cenerators.

Table	
3.3.2-1	
Note q	

PI Current TS

TABLE TS.3.5-2B (Page 6 of 9)

ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION



PI Current TS

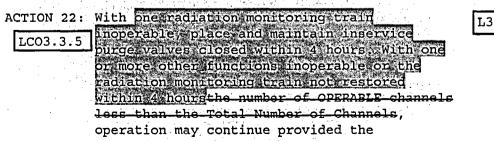
TABLE 3.5-2B (Page 7 of 9)

Action Statements

ACTION 20:	With the number of OPERABLE channels
LC03.3.2	one <u>train inoperable</u> less_than_the_Total Number_of_Channels, restore the
Cond C	inoperable <u>trainchannel</u> to OPERABLE
	status within 6 hours or be in at least MODE 3 HOT SHUTDOWN within 12the next 6
	hours and in MODE S COLD SHUTDOWN within 42the following 30 hours;
	however, one channel may be bypassed
	for up to 8 hours for surveillance testing per Specification 4.1, provided
	the other channel is OPERABLE.
. •• • · · ·	

LCO3.3.2 Cond D,E

ACTION 21: With one or two containment pressur the number of OPERABLE channels -less the Total Number of Channels than_ inoperable, operation may proceed provided the first inoperable channel(s) is placed in the tripped condition within 6 hours and the second inoperable channel is placed in bypass within 6 hours or be in MODE 3 in 12 hours and MODE 4 in 18 hours and the Minimum Channels OPERABLE requirement is met. One inoperable channel may be bypassed at a time for up to 4 hours for surveillance testing per Specification 4.1.



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L3.3-53



Markup for PI ITS Part C

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L3.3-22

A3.3-18

A3.3-21

A3.3-29

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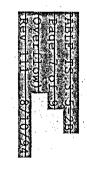
LCO3.3.5 containment unservice purge supply and	
exhaust valves are maintained closed [as	A3.3-54
required by ITS (LCO-3.6.3) and 3.9.4).	A3. 3-54
ACTION 23: With one the number of OPERABLE	A3.3-18
LCO3.3.2 channels pratraininoperable one less	A3.3-10
Cond B than the Total Number of Channels,	
restore the inoperable channel to	
OPERABLE status within 48 hours or be in at least MODE 3 HOT SHUTDOWN within	A3.3-21
54the next 6 hours and in MODE 5 COLD	A3.3-21
SHUTDOWN within 84the following 30	A3.3-29
hours.	L
ACTION 24: With one channel inoperable the number	
of OPERABLE channels one less than the	A3.3-18
LCO3.3.2 Total Number of Channels, operation in	<u> </u>
Cond D,G the applicable MODE may proceed	
provided the following conditions are	
satisfied:	
a. The inoperable channel is placed in	
the tripped condition within 6 hours	
Cond D.G. Or be in MODE 3 within 12 hours,	L3.3-22
and, and and	
LCO3.3.2 be in MODE 4 within 18 hours	
Cond D	
only b. The Minimum Channels OPERABLE	A3.3-18
requirement_is_met;_however,the	
inoperable channel may be bypassed	

A3.:	3-21
A3.3	-29

A LC Cc

3.3.2 d D,G	brabe in MODE 3 within 12 hours, and,
3.3.2 d D	be in MODE 4 within 18 hours.
v _	b. The Minimum Channels OPERABLE
	requirement is met; however, the inoperable channel may be bypassed for up to 4 hours for surveillance
	testing of other channels per Specification 4.1.

L3.3-22



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TABLE 3.5-2B (Page 8 of 9)

Action Statements

ACTION 25:	With the number of OPERABLE channels
LCO3.3.2 Cond F	one <u>trainwinoperable</u> less than the Total Number of Channels, restore the inoperable channel to OPERABLE status
	within 6 hours or be in at least MODE HOT SHUTDOWN within 2 the next 6 hours. Operation in MODE HOT SHUTDOWN may proceed provided the main steam isolation valves are closed, on if not,
	be in at least MODE 4 INTERMEDIATE SHUTDOWN within 18the following 6 hours. However, one channel may be bypassed for up to 8 hours for
	surveillance testing per Specification 4.1, provided the other channel is OPERABLE.
ACTION 26: LCO3.3.2 Cond I	With the number of OPERABLE channels one channel inoperable loss than the Total Number of Channels, declare the associated auxiliary feedwater pump
	inoperable and take the action required by specification 3.4.2.

by specification 5.4.2.	
ACTION 27: With the number of OPERABLE channels	Addressed
one less than the Total Number of	Elsewhere_
Channels, restore the inoperable	an S
Channel to OPERABLE status within 48	2010) 1940
hours or be in at least HOR SHUTDOWN	
within the next 6 hours and close the	
associated valve	
	f

Page Rev 1 TABLE q 8/10/94 փ =2B

A3.3-18

A3.3-21

A3.3-29

A3.3-18

.	ABLE 2-5-2B (Page 9-of 9) (Overflow)
. *-	an a
ACTION 28:	With the number of OPERABLE channels
	one train inoperable less than the
LCO3.3.2	Total-Number of Channels, restore the
Cond F	inoperable channel to OPERABLE status
	within 6 hours or be in at least MODE 3
	HOT SHUTDOWN within 12the next 6 hours.
· · · · ·	Operation in MODE 3 may continue
	provided the main steam isolation
	valves are closed, or be in at least
· · · · · · · · · · · · · · · · · · ·	MODE 4 within 18 hours However, one
	channel may be bypassed for up to 8
	hours for surveillance testing per
	Specification 4.1, provided the other
۰ ۲۰۰۰ ۲۰۰۰	channel_is_OPERABLE.
	an an early an 1998 and than an an an ann an ann an an an an an an
ACTION 29:	With one channel inoperable (Condition
LC03.3.2	H: or both channel(s) inoperable on one
Cond D, H	bus) the number of OPERABLE channels
cond by m	less_than_the_Total_Number_of_Channels,
1.0	operation in the applicable MODE may
	proceed provided the following
	conditions are satisfied:
	a. The inoperable channel(s) is placed
	in the tripped condition within 6
the state of the s	hours
LC03.3.2	
Cond D, H	or be in MODE 3 within 12 hours,
L	and, the state state and the state of the st
e Ner Mar	and the second
LC03.3.2	be in MODE 4 within 18 hours.
Cond D	
only	b. The Minimum Channels OPERABLE
	requirement_is_met;_however,_ one
	inoperable channel may be bypassed
	at a time for up to 4 hours for
	surveillance testing of other
	channels per Specification 4.1

A3	.3-	-T8	
		-	

1	A3.3-21
	A3.3-29
1	M3.3-60

A3	.3-18

A3.3-18

L3.3-22

A3.3-18

Markup for PI ITS Part C



PI Current TS

TABLE 3.5-2B (Page 9 of 9)

Action Statements

ACTION 30: With one the number of OPERABLE channels inoperable one less than the Total Number of Channels, declare the associated auxiliary feedwater pump inoperable and take the action required by Specification 3.4.2. However, one channel may be bypassed for up to 8 hours for curveillance-testing per Specification 4.1, provided the other channel is OPERABLE.

ACTION 31:	With one or more Functions with the
LCO3.3.4 Cond A	number of OPERABLE channels one channel per bus inoperable less than the Total Number of Channels, operation in the
	applicable MODE may proceed provided the inoperable channel is placed in the bypassed condition within 6 hours.

- ACTION 32: With the number of OPERABLE channels two less than the Total Number of Channels, operation in the applicable MODE may proceed provided the following conditions are satisfied.

 - All-of-the-channels-associated with-the-redundant-4kV-Safeguards Bus-are-OPERABLE.

A3.3-18

A3.3-55

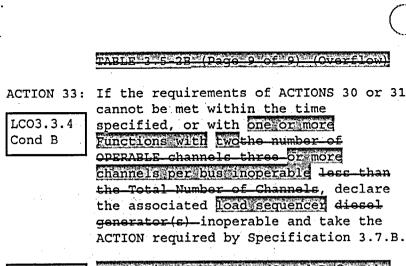


A3.3-56

-TABLE TS.3.5-2B Page 9 of 9 Rev 143 3/17/99

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LCO3.3.4 Cond C, D

New Action Statements C, and D for the load sequencer with appropriate Required Actions and Completion Times.

ACTION 34:With the number of OPERABLE channels less than the Total-Number of Channels, operation may proceed provided the inoperable channel is placed in the tripped condition within 6 hours and the Minimum Channels OPERABLE requirement is met. Restore the inoperable channel to OPERABLE status within 72-hours or be in at least HOT SHUTDOWN within the next 6 hours and in COLD SHUTDOWN within the following 30-hours.

ACTION 35:With-one-channel inoperable, restore-the inoperable channel to OPERABLE-status-within 72 hours or be in at least-HOT-SHUTDOWN within the next 6 hours and in-COLD-SHUTDOWN within the following 30-hours.

CTION-36:Two channels may be inoperable for up to 1 hour for surveillance-testing per Specification-4.1.---Restore at least one channel-to operable status within-this 1 hour or initiate the action necessary-to-place the affected unit in HOT-SHUTDOWN, and be in at least HOT-SHUTDOWN within the next 6 hours and-in-COLD SHUTDOWN within the following 30 hours.

A3.3-18



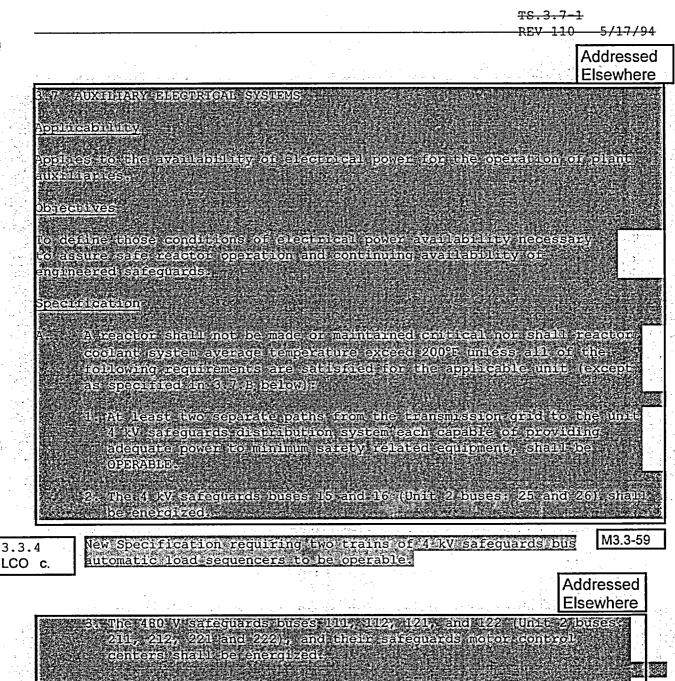
M3.3-61

A3.3-50



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TS-3-6-2 REV-91--10/27/89 6.D. Containment Purge System the structure structure is 1 The 36-inch containment purge system double gasketed blind flanges shall be installed whenever the reactor is above COLD SHUTDOWN; The 18-inch containment inservice purge system double gasketed blind flanges shall be installed whenever the reactor is above COLD SHUTDOWN except as noted below. The inservice purge, system may be operated above, COLD SHUTDOWN if the following conditions are met: a. The debris screens are installed on the supply and exhaust ducts in containment The two:automatic primary containment isolation valves in each duct that penetrates containment shall satisfactorily pass a local leak rate test prior to use. e. The two automatic primary containment isolation valves and LCO3.3.5 the automatic shield building ventilation damper in each Addressed duct that penetrates containment shall be OPERABLE, Elsewhere including instruments and controls associated with them. d. If an inservice purge system automatic primary containment LCO3.3.5 isolation valve or automatic shield building ventilation Cond B damper becomes inoperable, apply the requirements of Specification 3.6.C.3. e. The blind flanges (i.e., 42B (53 in Unit 2) and 43A (52 in ... Unit 2)) shall be reinstalled and satisfactorily pass a local leak rate test; each time after the in-service purge system is used. Auxiliary Building Special Ventilation Zone Integrity. THE REPORT OF A A reactor shall not be made or maintained critical nor shall reactor coolant system average temperature exceed 200°F unless AUXILIARY BUILDING SPECIAL VENTILATION ZONE INTEGRITY is maintained. If these conditions cannot be satisfied (except as , specified in 3.6.E.2 and 3 below) within 24 hours initiate the actions necessary to place both units in HOT SHUTDOWN, and be at least HOT SHUTDOWN within the next 6 hours, and in COLD ; ; ; SHUTDOWN, within the following 30 hours. "我,我你并 Openings in the Auxiliary Special Ventilation Zone are permitted provided they are under direct administrative control and can be reduced to less than 10 square feet within 6 minutes following an accident. 14 - 14 A A A Valves and actuation circuits that isolate the Auxiliary Building Normal Ventilation System following an accident may inoperable for 7 days provided the ventilation system can be manually isolated within 6 minutes following an accident: PI Current TS 39 of 72 Markup for PI ITS Part C



4 Reactor protection instrument AC buses shall be energized: 111, 112, 113 and 114 (Unit 2 buses: 211, 212, 213, and 214)

. The following unit specific conditions apply:

(a) Unit 1: D1-and D2 diesel generators are OPERABLE, and a fuel supply of 51,000 gallons 1; available for the D1 and D2 diesel generators in the Unit 1 interconnected diesel fuel oil storage tanks. A total fuel supply of 70,000 gallons 1; available for the D1 and D2 diesel generators and the

PI Current TS

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TS 3 8-2 REV 119 7/3/95 A.1.C. The core subcritical neutron flux shall be continuously monitored by at least two neutron monitors, each with continuous visual indication in the Control room and one with audible indication in the containment, which are in service whenever core geometry is being changed. When core geometry is not being changed, at least one neutron flux monitor shall be in service. The plant shall be in the REFUELING condition. ... e. During movement of fuellassemblies or control rods out of the reactor vessel, at least 23 feet of water shall be maintained above the reactor vessel flange. The required water level shall be verified prior to moving fuel assemblies or control rods and at least once every day while the cavity is flooded. At least one residual heat removal pump shall be OPERABLE running. The pump may be shut down for up to one hour to facilitate movement of fuel or core components. and · 《元:书4.为: If the water level above the top of the reactor vessel flange is less than 20 feet, except for control rod unlatching/latching, r operations or upper internals removal/replacement, both residual heat removal loops shall be OPERABLE. Direst communication between the control room and the operating floor of the containment shall be available whenever CORE ALTERATIONS are taking place. No movement of irradiated fuel in the reactor shall be made until the reactor has been subcritical for at least 100 hours.

LCO3.3.5

j. The radiation monitors which initiate isolation of the Containment Purge System shall be tested and verified to be OPERABLE prior to CORE ALTERATIONS.

2. If any of the above conditions are not met, CORE ALTERATIONS shall cease. Work shall be initiated to correct the violated conditions so that the specifications are met, and no operations which may increase the reactivity of the core shall be performed.
3. If Specification 3.8.A.1 for 3.8.A.1 g cannot be satisfied, all fuel handling operations in containment shall be suspended, the requirements of specification 3.8 A 1.a.1) shall be satisfied, at least one door in each personnel air lock shall be closed; and no reduction in reactor coolant boron concentration shall be made;

Addressed Elsewhere

TS-3-15-1 REV 121-11/9/95

LCO3.3.3 3.15 EVENT MONITORING INSTRUMENTATION Applicability LCO3.3.3 Applies during MODES 1, and 2. Objective To ensure that sufficient information is available to operators to determine the effects of and determine the course of an accident to the extent required to-carry-out-required-manual-actions. Specification LC03.3.3 A. Event monitoring instrumentation shall be OPERABLE as specified in Table TS. 3.15-1. Action-statements-applicable-by-reference-from Table-TS. 3.15-1. A3.3-04 B.-3.3.3

LCO 3.0.4 is not applicableMODES-1, and 2 may be entered when a c. LIMITING CONDITION FOR OPERATION is not met. A3.3-63

The-provisions-of-specification-3.0.C-are-not-applicable.

M3.3-64

A3.3-62

Actions

Note 1

TABLE TS 3.15-1 (Page 1 of 2) EVENT MONITORING INSTRUMENTATION

	Function	Required Channels	Action ^(a)	
Table 1. 3.3.3-1 Func 1	Power Range Neutron Flux (Logarithmic Scale)	2	A3.3-07	
Table 2. 3.3.3-1 Func 2	Source Range Neutron Flux (Logarithmic Scale)	2	1	
Table 3.3.3-1 3. Func 3	Reactor Coolant System (RCS) Hot Leg Temperature	2	2 1, 2	
Table 3.3.3-1 Func 4	RCS Cold Leg Temperature	2	[] 1,2	
Table 5. 3.3.3-1 Func 5	RCS Pressure (Wide Range)	2	1 <mark>12</mark>	
Table 3.3.3-1 6. Func 6	Reactor Vessel Water Level	2	Ē <u>1, 3</u>	
Table 3.3.3-1 Func 7	Containment Sump Water Level (Wide Range)	2	Table T REV 121	
Table 8. 3.3.3-1 Func 8	Containment Pressure (Wide Range)	2	$\mathbb{E}_{\frac{1}{2},-2}^{\frac{1}{2}}$ A3.3-65	
Table 9. 3.3.3-1 Func 9	Penetration Flow Path Automatic Containment Isolation Valve Position	2 per penetration flow path ^{(b)(c)}	A3.3-65	•

PI Current TS

BLE TS 3.15-1 (Page 1 of 2) (Overflow)

	Table 3.3.3-1 Func 10	10.	Containment Area Radiation (High Range)	2	₫ 1,3
	Table 3.3.3-1 Func 11	11.	Hydrogen Monitors	2	2 <mark>174</mark>
-	Table 3.3.3-1 Func 12	12.	Pressurizer Level	2	1 1, 2
	Table 3.3.3-1 Func 13	13.	Steam Generator Water Level (Wide Range)	2 per steam generator	1. 2
	Table 3.3.3-1 Func 14	14.	Condensate Storage Tank Level	2	1 7-2
	Table 3.3.3-1 Func 15	15.	Core Exit Temperature Thermocouples	4 per core quadrant	A3.3-68
	Table 3.3.3-1 Func 16	16.	Refueling Water Storage Tank Level	2	E
	Table 3.3.3-1 Note c	(C)	A channel consists of one core exit thermocouple ((dennys.	A3.3-68

PI Current TS

TABLE TS. 3.15-1 (Page 2 of 2) EVENT MONITORING INSTRUMENTATION

	(a)	Actio	n Statements
	LCO3.3.3 Actions Note 2	Separ	ate Action Statement entry is allowed for each Function.
	LCO3.3.3 Cond A	1.	With one required channel inoperable, either restore the required channel to OPERABLE status within 30 days,
	LCO3.3.3 Cond C		or submit a report to the Commission within the following 14 days.
	LCO3.3.3 Cond D	2.	With two required channels inoperable, either restore one channel to OPERABLE status within 7 days
		•	
•	LCO3.3.3 Cond I		or be in at least MODE 3 within the next 6 hours.
• • •	LCO3.3.3 Cond D	3.	With two required channels inoperable, either restore one channel to OPERABLE status within 7 days,
	LCO3.3.3 Cond J		or submit a report to the Commission within the following 14 days.
		н. 1919 - Алт	
	LCO3.3.3 Cond E	4.	With two required channels inoperable, either restore one channel to
•	LCO3.3.3 Cond I		or be in at least MODE 3 within the next 6 hours.
	LCO3.3.3 Cond H		A3.3-69 A3.3-69 New Condition H - enter Table 3.3.3-1 as required when other Conditions are not meta A
		- ·	

PI Current TS

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With the number of OPERABLE channels for the core exit thermocouples less than the Required Channels shown on Table TS.3.15-1, but with greater than or equal to 4 core exit thermocouples OPERABLE in the center core region and greater than or equal to one core exit thermocouple OPERABLE in each quadrant of the outside core region, restore the inoperable channels to OPERABLE status within 30 days,

LCO3.	3.3	
Cond	C	

LCO3.3.3

Cond B

5.

or submit a report to the Commission within the next 14 days.

	I		· •			
LCO3.3.3		As	a minin	mum,	the	Requir
Actions	Γ.	to	MODE-2	sta	rtup-	-follow
Note 3	[].				-	

s a minimum, the Required Channels <u>shall</u>will be <u>operable</u>restored prior A3.3-66 o MODE startup following each the next refueling outage.

			6.	
	LCO3.	.3.	3	
1	Cond	F,	G	
•		•	2 (i.e.) 	• •
				1

With the less than two core exit thermocouple channels OPERABLE in one or more quadrants, and with either less than 4 core exit thermocouple OPERABLE in the center region or less than one core exit thermocouple OPERABLE in each quadrant of the outside core region, restore the inoperable channels to OPERABLE status within 7 days,

A3.3-66

		_	
LCO3.	3.3	1	
Cond	I		:.

or be in at least MODE 3 within the next 6 hours.

Table
3.3.3-1(b)Not required for isolation values whose associated penetration is isolated by at
least one closed and deactivated automatic value, closed manual value, or blindL3.3-67Note aIndext one closed and deactivated automatic value, secured.Image or check value with flow through the value secured.Table
3.3.3-1
Note bC)Only one position indication channel is required for penetration flow paths with only one
installed control room indication channel.

Tabre 78-3 15-f

8/10/94

A3.3-01

4.1 OPERATIONAL SAFETY REVIEW

Applicability

Applies to items directly related to safety limits and limiting conditions for operation.

Objective

To-specify-the-minimum-frequency and-type-of-surveillance-to-be-applied to-plant-equipment-and-conditions.

Specification

A. Calibration, testing, and checking-of instrumentation channels and testing of logic channels shall be performed as specified in Tables TS.4.1-1A, 4.1-1B and 4.1-1C.

B. Equipment_tests_shall_be-conducted_as_specified_in_Table_TS.4.1-2A.

A3.3-04

A3:3-04

A3.3-04

C. -- Sampling-tests-shall-be-conducted as-specified-in-Table-TS.4.1-2B.

and a state of the s		Addressed Elsewhere
D. Whenever the selan	eleondationals such that a system or	componentris
- not required re b	E OBERABLE CHEUSURVEILLANCE TESTING a	ssociated
With that system	or component may be discontinued	scontinued
survey by an are sub-	s shall, be resumed less than one test	interval of the
F. Defote establish	ng glant constitues requiring OPDROBI.	11Y of the
. Associated system	eor component, unless such testing is	not long
prachicable (i.e.	, budiear power manue, calibration can	not be done.
prior to reaching	POWER OPERATION) in which case the to	esting wall
be resumed whichda	AB hours of entaining the claim cond	ition which the
the opermits testing t	o be account tened a sufficient to the second second	

TABLE TS.4.1-1A (Page 1 of 5)

REACTOR TRIP SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

							A3.3-72]
	FUNCTIONAL UN	IT	CHANNEH CHECK	CALIBRATE	UNCTIONAL TEST	RESPONSE TEST	MODES FOR WHICH SURVEILLANCE IS REQUIRED	
	Table 3.3.1-1 Funct 1	eactor Trip	N.A.	N.A.	R ⁽¹³⁾ SR3-3-1-414	N.A.	1, 2, 3 ⁽¹⁾ , 4 ⁽¹⁾ , 5 ⁽¹⁾	
	Table	ige, Neutron Flux						
t 4	3.3.1-1 Funct 2a Funct 6 Funct 7	Setpoint	S SR3#3*1*1	$\frac{M^{(6, -7)}}{Q^{(7, -8)}}$	Q ⁽¹⁹⁾ SR3, 3, 1, 7/	R 222 SRS 571.1	LR3.3-75	
	Table b) Low S 3.3.1-1 Funct 2b	Setpoint	S SR3-3-1-1-1	SR3.3.1.11 R ⁽⁷ 7.4) SR3.3.1.11	S/U ^(17,13) SR3, 3, 1, 8	R ¹²²¹ SR3-3-1-1	1 ⁽³⁾ , 2	ti solo
		nge, Neutron Flux, tive Rate	N.A.	R ⁽⁷ 23) SR3, 3, 1, 11	Q SR3-3-1-7	R ⁽²²⁾ SR3-3-1-1	1, 2	
		nge, Neutron Flux, ative Rate	N.A.	R ⁽⁷ 77) SR3.3.40.11	Q SR3 3.21.7	R ^[22] SR3 (3.1.1	1, 2 6	TABLE T (Page 1
	Table45.Intermedi3.3.1-1Neutron HFunct 4	.ate Range, Clux	S SR3, 3, 1, 1, 1,	R (7724) SR3 3 51 111	S/U ⁽⁴ T) SRS 3 T 8	R	M3.3-73 1 ⁽³⁾ , 2 A3.3-11 L3.3-74	TABLE TS.4.1-1A (Paye 1 of 5) REV 111 8/10/94
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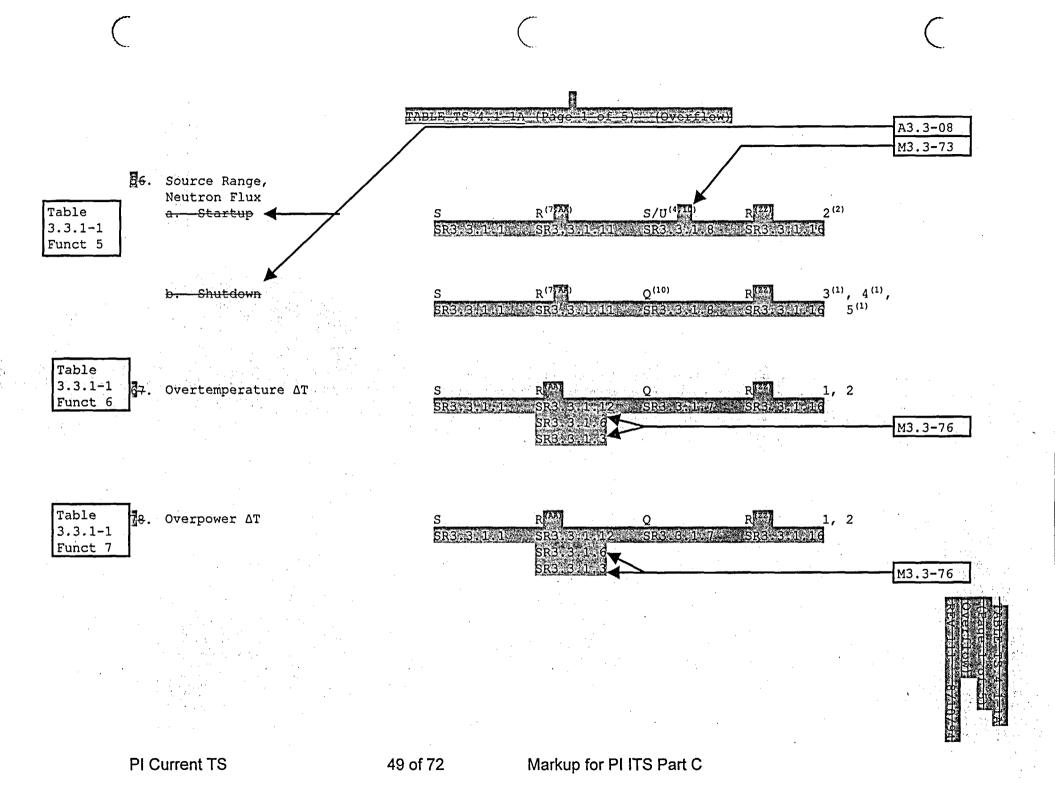
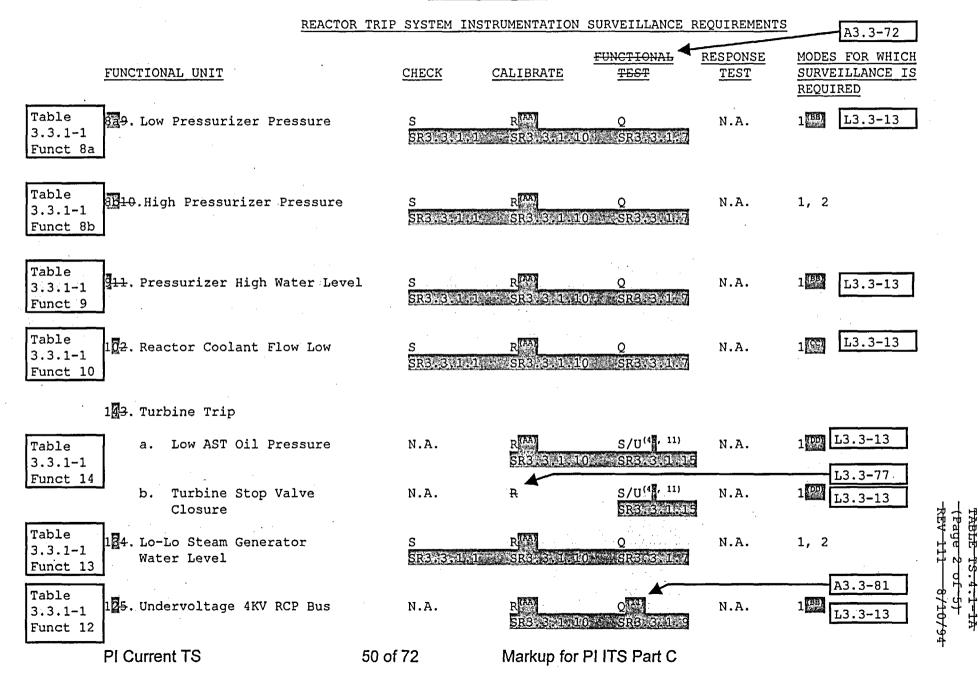
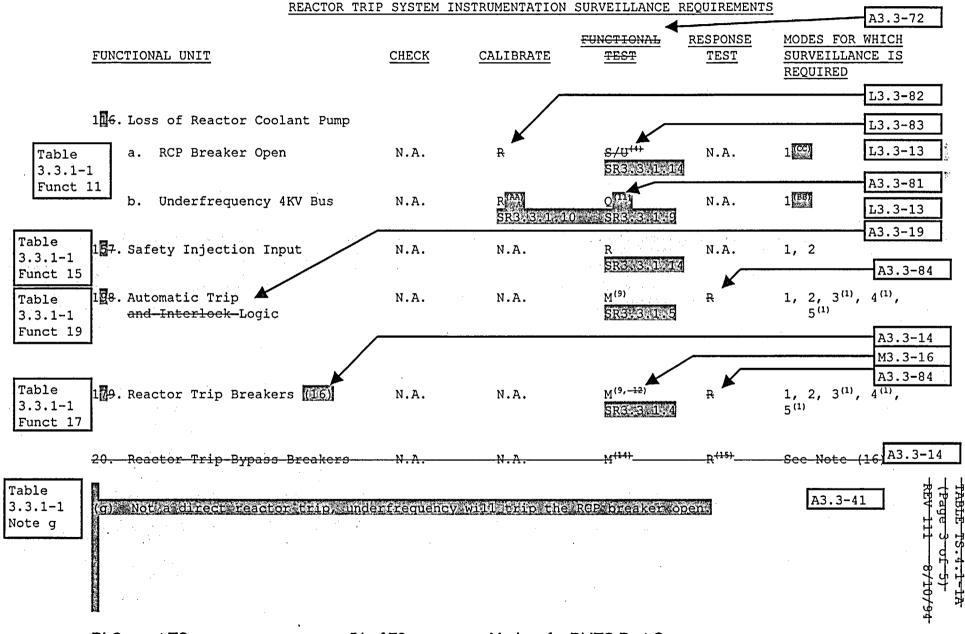


TABLE TS.4.1-1A (Page 2 of 5)



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TABLE TS.4.1-1A (Page 3 of 5)



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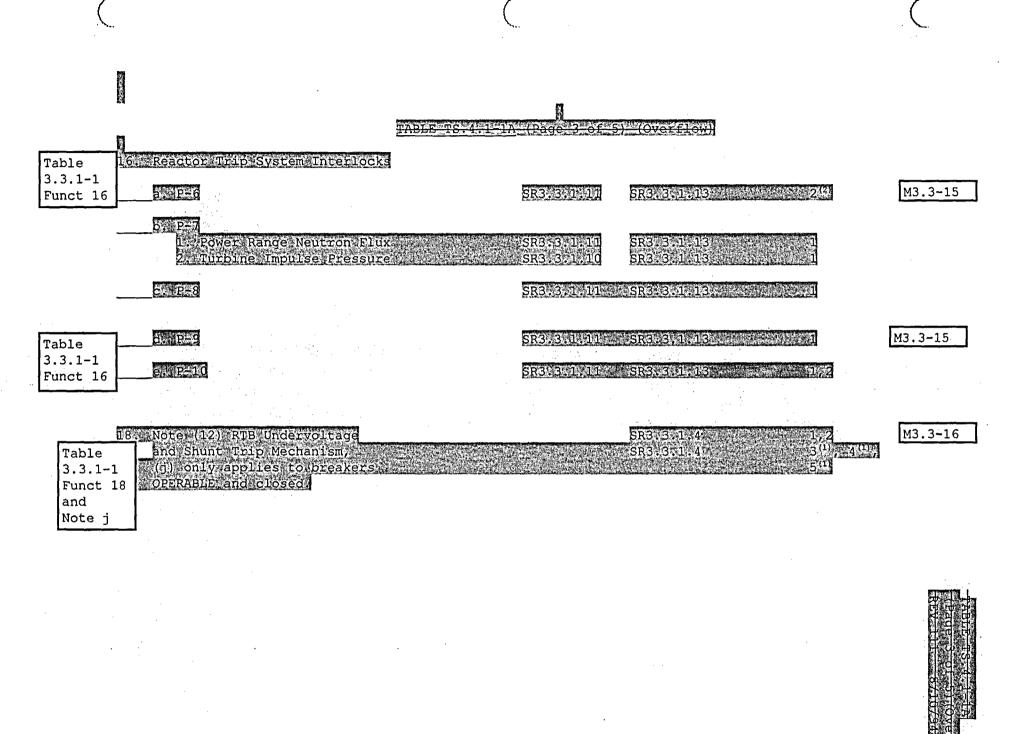


TABLE TS.4.1-1A (Page 4 of 5)

TABLE NOTATIONS

-85

FREQUENCY NOTATION

- <u> </u>	NOTATION	FREQUENCY	A3.3-
	.		
	S	Shift	
	_ 	Daily	
	M	<u>Monthly</u>	
.	<u> </u>	Quarterly	
	<u>S/U</u>	Prior to each reac	tor-startup
	R	Each-Refueling-Shu	tdown
		Not-applicable.	

TABLE NOTATION

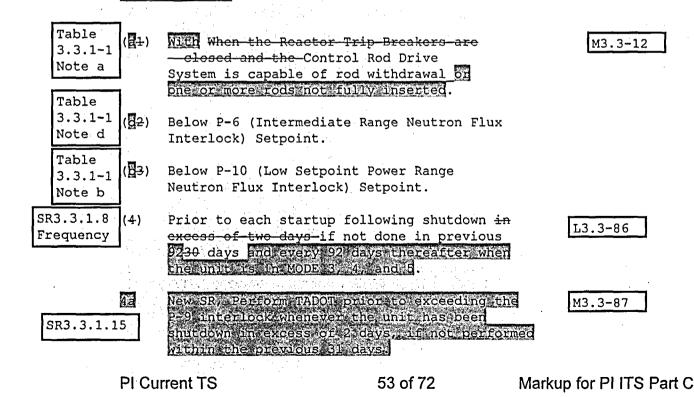


TABLE TS.4.1-1A (Page 4 - of -5) REV 111 - 8/10/

·•	
	TABLE TE.4.1 1A (Page 4 of 5) (Overflow)
(5) SR3.3.1.2	Comparison of calorimetric to excore power indication within 12 hours after above 15% of RATED THERMAL POWER. Adjust excore channel gains consistent with calorimetric power if absolute difference is greater than 2%.
(6) SR3.3.1.3	Single point comparison of incore to excore for axial off-set prior to exceeding.75% RTP after each refueling after above 15% of RATED THERMAL POWER. Recalibrate if the absolute difference is L3.3-93 greater than 32%.
SR3.3.1.11 Note (7)	Neutron detectors <u>Aremay be</u> excluded from <u>A3.3-94</u> CHANNEL CALIBRATION.
(8) SR3.3.1.6	Incore - Excore Calibration, within 24 hours after above 75% of RATED THERMAL POWER. M3.3-92
(9) SR3.3.1.4 SR3.3.1.5	Each train shall be tested at least every-two-month on a STAGGERED TEST BASIS.

TABLE TS 1 1-11 (Page A joi (Noverflyw) Rev 111 8/10/94

TABLE TS.4.1-1A (Page 5 of 5)

TABLE NOTATIONS Continued)

(10) SR3.3.1.8 Note

Quarterly surveillance in MODES 3, 4 and 5 shall also include verification that permissives P-6 and P-10 are in their required state for existing plant conditions by-observation of the permissive annunciator window.

LR3.3-96

SR3.3.1.9	(11)
SR3.3.1.15	(11)
Note	
	-

Setpoint verification is not applicable.

(12)
Table	
3.3.1-1	
Funct 18	

The Functional Test shall independently verify the OPERABILITY of the undervoltage and shunt trip attachments of the Reactor Trip Breakers.

- (13) The Functional Test shall independentlyverify the OPERABILITY of the undervoltage and shunt-trip circuits for the Manual Reactor Trip Function. The test shall also verify the OPERABILITY of the Bypass Breaker trip-circuit(s).
- (14) Manually trip the undervoltage trip attachment remotely (i.e., from the protection system racks).

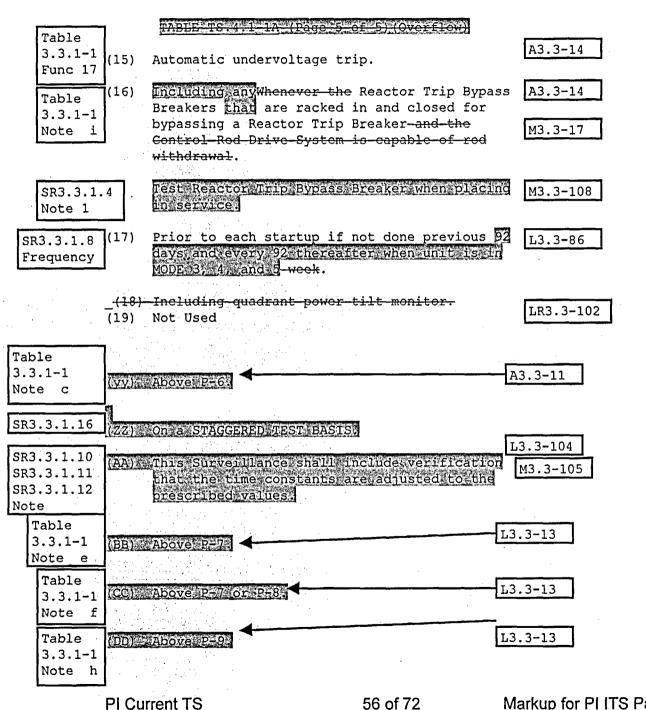
LR3.3-101

LR3.3-101

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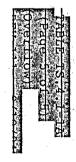


TABLE TS.4.1-1B (Page 1 of 7)

ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

						A3.3-72
FUNCTIONAL UNIT	CHECK	CALIBRATE	TEST	RESPONSE TEST	MODES FOR U SURVEILLANC REQUIRED	WHICH CE IS
1. SAFETY INJECTION						
Table 3.3.2-1 a. Manual Initiation Func 1a	N.A.	N.A.	R ⁽²⁰⁾ SR3 3 2 5	N.A.	1, 2, 3, 4	
TableHigh Containment3.3.2-1PressureFunc_1cIc	S SR3\\3\2	R ^[27] 1	Q SR3.3(.2.3	N.A.	1, 2, 3,-4	L3.3-36
TableHe.Steam Line Low3.3.2-1PressureFunc 1e	S SR9: 342	R ^[27] 3.1. (SR3: 3, 2, 6)	Q SR3, 3, 2+3	N.A.	1, 2, 3 ⁽²¹⁾	
Tabled.Pressurizer Low3.3.2-1PressureFunc 1d	S SR3::3::2	R ¹²⁷⁷ 51. SR3.3,276	Q 	N.A.	1, 2, 3 ⁽²¹⁾	A3.3~35
TableBe.Automatic Actuation3.3.2-1Logic and ActuationFunc_1bRelays	N.A.	N.A.	M ⁽²²⁾ SR3:3:2:22	N.A.	1, 2, 3, 4	-TABLE TS.4.1-18 -(Page 1 of 7) -Rev 111 - R/10/
2. CONTAINMENT SPRAY						
Table 3.3.2-1 a. Manual Initiation Func 2a	N.A.	N.A.	r sr3324	N.A.	1, 2, 3, 4	-1-1B -7 7 8/10/94
TableEb.Hi-Hi Containment3.3.2-1Pressure	S SR3.3.2	R ⁽²⁷⁾ 1 SR3, 3, 2, 6	Q SR31. 57.24.3	N.A.	1, 2, 3 , 4	L3.3-37
Func_2cTable3.3.2-1Func_2b	N.A.	N.A.	M ⁽²²⁾ SR3,31222	N.A.	1, 2, 3, 4	H3.3-33
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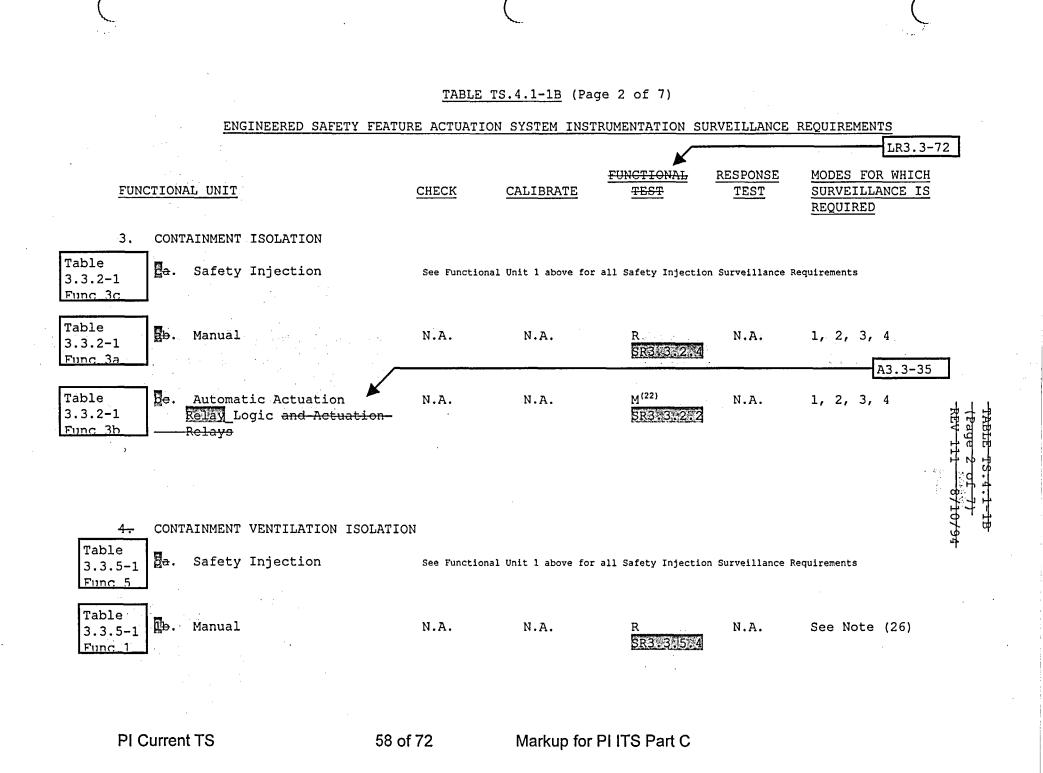


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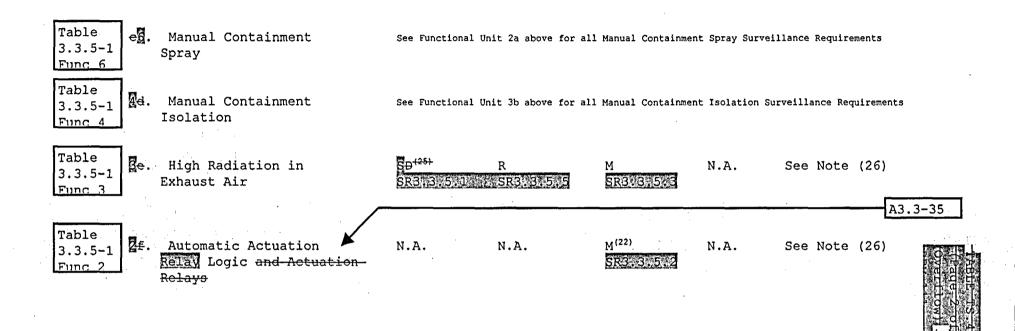
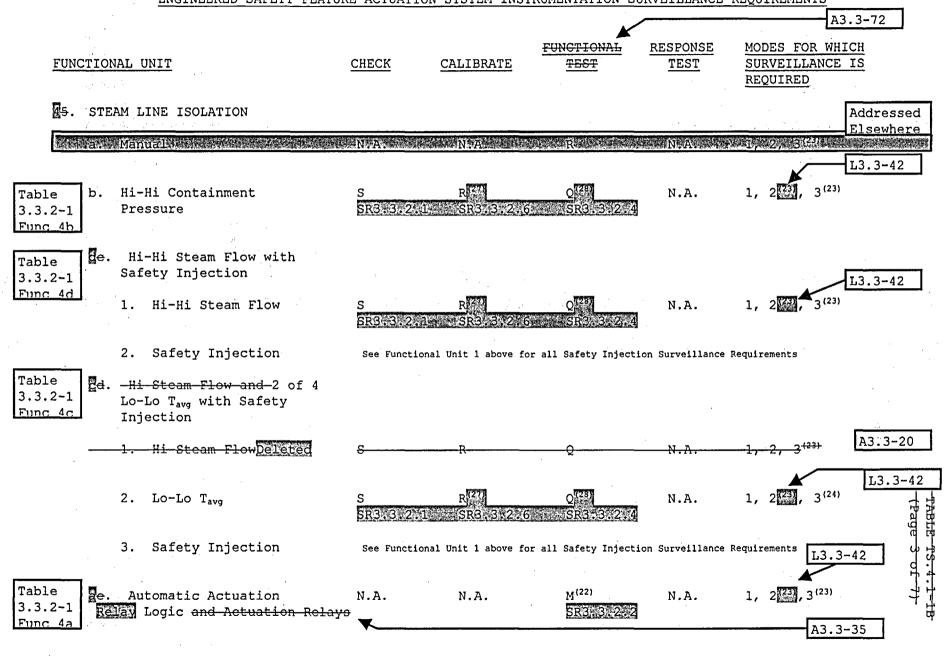


TABLE T. .. 1-1B (Page 3 of 7)

C

ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS



PI Current TS

TABLE TS.4.1-1B (Page 4 of 7)

A3.3-72 FUNCTIONAL RESPONSE MODES FOR WHICH FUNCTIONAL UNIT SURVEILLANCE IS TEST CHECK CALIBRATE TEST REQUIRED 56. FEEDWATER ISOLATION Table Ba. Hi-Hi Steam Generator 2(29) N.A. 1, 0 3.3.2-1 Level SR3 -302-6 SR3.3. Func 5b Table сь. Safety Injection See Functional Unit 1 above for all Safety Injection Surveillance Requirements 3.3.2-1 Func 5c Reactor-Trip-with 2-of 4 e. -(Main-Valves Only) LR3.3-44 Reactor Trip N.A. N-A N-A-Fom-Table M(55) 2⁽²⁹⁾, 3⁽²⁹⁾ M3.3-106 ad. Automatic Actuation N.A. N.A. N.A. 1, 3.3.2-1 Relay Logic and Actuation Relays SR3.3.2 Func 5a A3.3-35 -REV (Page ABLE 8/10/94

ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

PI Current TS

TABLE TS.4.1-1B (Page 5 of 7)

ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS A3.3-72 FUNCTIONAL RESPONSE MODES FOR WHICH SURVEILLANCE IS FUNCTIONAL UNIT CHECK CALIBRATE TEST TEST REQUIRED 67. AUXILIARY FEEDWATER N-A LR3.3-46: Manual N.A N.A. Steam Generator Low-Low Table b. S 0 N.A. 1, 2, 3 3.2.6 SR3.3.2 3.3.2-1 Water Level SR3.3.2.1 - SR3 Func 6b Table de. Undervoltage on 4.16 kV N.A. N.A. 1, 2 3.3.2-1 Buses 11 and 12 (Unit 2: Func 6d 21 and 22) (Start Turbine __Driven Pump only) Table 3.3.2-1 Note f ed. Trip of Both Main Table Feedwater Pumps 3.3.2-1 Func 6e 1, 2^(EE) Turbine-Driven N.A. N.A. N.A. SR3.3.2. -(Paye 5 of 7) -REV 111 - 8/10/94 TABLE TS:4.1-1B A3.3-51 2.- Motor Driven N.A. N-A N.A Table e. Safety Injection See Functional Unit 1 above for all Safety Injection Surveillance Requirements 3.3.2-1 Func 6c A3.3-35 Ef. Automatic Actuation M(22) 1, 2, 3 Table N.A. N.A. N.A. Relay Logic and-Actuation-Relays SR3.3.2. 3.3.2-1 Func 6a **PI Current TS** 62 of 72 Markup for PI ITS Part C

TABLE TS.4.1-1B (Page 6 of 7)

ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS A3.3-72 FUNCTIONAL RESPONSE MODES FOR WHICH FUNCTIONAL UNIT SURVEILLANCE IS CHECK CALIBRATE TEST TEST REQUIRED LOSS OF POWER <u>e</u>___ LCO3.3.4 a. Degraded Voltage 1, 2, 3, 4 N.A. N.A. R М SR3.3.4.2 SR3.3.4.1 4kV Safeguards Bus b. Undervoltage Μ. 1, 2, 3, 4 N.A. N.A. R 4kV Safeguards Bus SR3, 3-4.2 SR3, 3-4.4

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TABLE TS.4.1-1B (Page 7 of 7)

TABLE NOTATIONS

FREQUENCY-NOTATION

- <u>NOTATION</u>	FREQUENCY
<u>S</u>	Shift
Đ	Daily
	Monthly
QQ	Quarterly
	Each Refueling-Shutdown
<u>N.A.</u>	Not applicable.

TABLE NOTATION

(20)	
SR3.3.2.5	
Frequency	

One manual switch shall be tested at each refueling on a STAGGERED TEST BASIS.

Table	(21)
3.3.2-1	/
Note a	

SR3.3.2.2

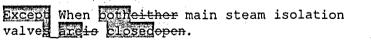
Frequency

(22)

Pressurized Trip-function-may be blocked in this MODE below a reactor coolant system pressure at or above of 2000 psig.

Each train shall be tested monthly at least every-two months on a STAGGERED TEST BASIS.

Table 3.3.2-1 Note c





A3.3-85

A3.	3-95

A3.3-43

TABLE TS.4.1-18 (Page 7-01-7) REV 111-8/10/94

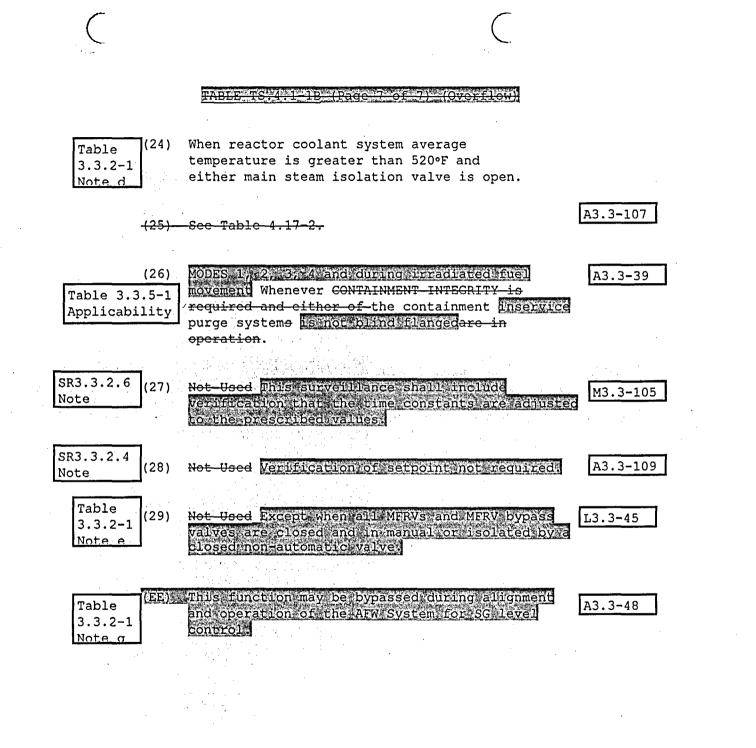


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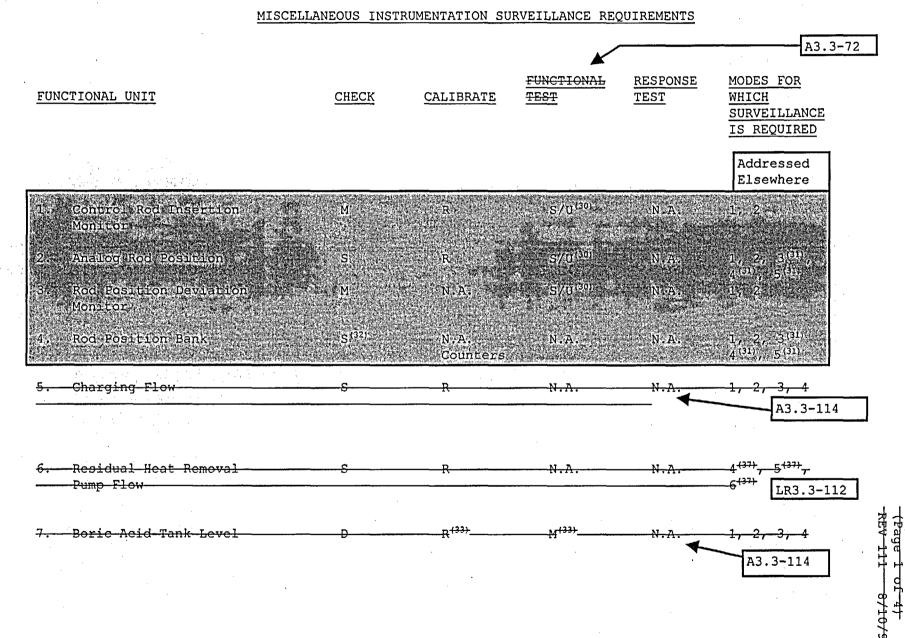
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TABLE TS.4.1-1C (Page 1 of 4)



PI Current TS

Markup for PI ITS Part C

TABLE

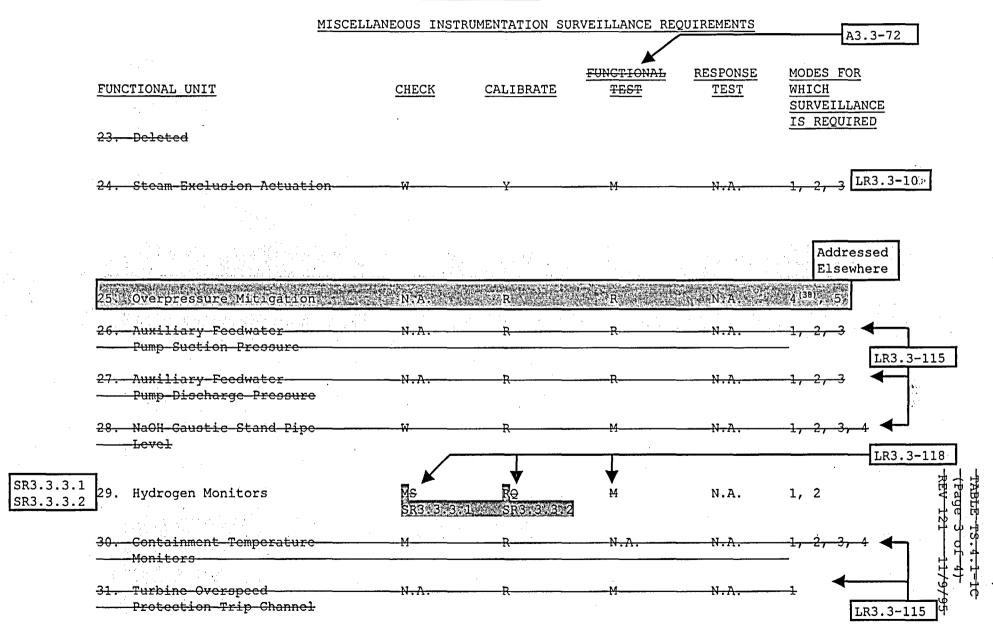
ABLE TS.4.1-1C (Page 1 of 4) (Overflow)

L3.3-113 Table N.A. Refueling Water Storage M 1, 2, 3, 4 3.3.3-1 Tank Level SR3.3.3.2 Func 16 A3.3-114 Volume-Control-Tank Level N.A N.A. Addressed elsewhere N.A ee Note (89) LC03.3.4 11. Auto Load Sequencers N.A. -N.A. Μ., N.A. 1, 2, 3, SR3: 3.4. -Borie-Acid-Make-up-Flow 12. N-A N-À N-A <u>Channel</u> A3.3-114

TABLE TS.4.1-1C (Page 2 of 4)

MISCELLANEOUS INSTRUMENTATION SURVEILLANCE REQUIREMENTS A3.3-72 FUNCTIONAL RESPONSE MODES FOR WHICH FUNCTIONAL UNIT CHECK CALIBRATE TEST TEST SURVEILLANCE IS REQUIRED 13. Containment Sump N.A. N.A. A,-B and-C Level LR3.3-115 14. Deleted 15. - Turbine-First Stage N-A. LR3.3-115 Pressure N.A. 17 .- Seismie Monitors LR3.3-115 N.A N.A. 5, 6 LR3.3-116 1, 2, 3(34) Coolant Flow - RTD 18. R SR3.3.1.12 N.A. L3.3-117 Bypass Flowmeter SR3.3.1.12 Note 1 19. CRDM Cooling N.A. N.A LR3.3-115 4311 Shroud-Exhaust Air Temperature LR3.3-115 20.--Reactor Gap-Exhaust N.A Air Temperature A3.3-121 (Page TABLE Ĭ N.A. Post-Accident Monitoring 1, 2 21. R М Instruments SRS 3. 3 SR3 SR3.3.3.1 N (Table TS.3.15-1)⁽³⁶⁾ N SR3.3.3.2 d SR3.3.3.3 22. Deleted

TABLE TS.4.1-1C (Page 3 of 4)



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TABLE TS.4.1-1C (Page 4 of 4)

TABLE NOTATIONS

FREQUENCY-NOTATION

NOTATION	FREQUENCY
	A3.3-85
S	Shift
D	Da ily
W	Weekly
M	Monthly
	Quarterly
<u>\$/U</u>	Prior-to-each-reactor-
	startup
V States	Yearly
$\mathbf{\hat{p}}$ and $\mathbf{\hat{p}}$ and $\mathbf{\hat{p}}$ and $\mathbf{\hat{p}}$ and $\mathbf{\hat{p}}$ and $\mathbf{\hat{p}}$	Each-Refueling-
	Shutdown
<u>N.A</u> .	Not-applicable.

TABLE NOTATION

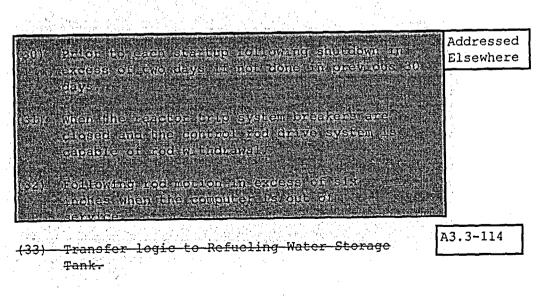
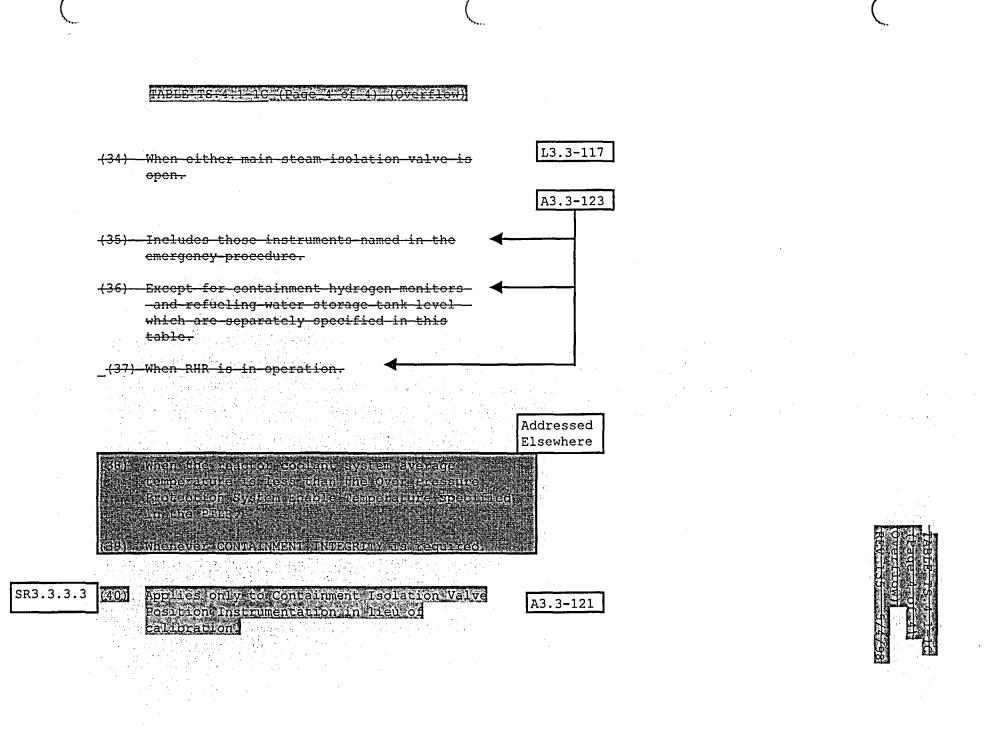


TABLE TS:4:1=10 -(Page 4 of 4) REV 135 5/4/9

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TS.3.10-5 REV-156-7/11/00 Addressed Elsewhere If the QUADRANT POWER THET RATIO exceeds 1.02 but is less than 1.07 for a sustained period of more than 24 hours, or if such a tilt recurs intermittently, the reactor shall be brought to the HOT SHUTDOWN condition. Subsequent operation below 50% of rating, for testing, shall be permitted Except for PHYSICS TESTS if the QUADRANT POWER THIT RATIO exceeds 1.07. the reactor shall be brought to the HOT SHUTDOWN condition. Subsequent operation below 50% of rating, for testing, shall be permitted. 4. If the core is operating above 85% power with one excore nuclear channel inoperable, then the core quadrant power balance shall be determined <u>Every 12 hoursdaily and after a 10%</u> L3.3-125 LCO 3.3.1 Cond D power-change-using either 2 movable detectors or 4 core thermocouples per quadrant, (ITS SR 3.2.4.2) per-Specification Note A3.3-126 3.11. Addressed Elsewhere Rod Insertion Limits 1. The shutdown rods shall be limited in physical insertion as specified, in the CORE OPERATING LIMITS REPORT when the reactor is critical or approaching criticality. When the reactor is critical on approaching criticality, the control banks shall be limited in physical insertion as specified in the CORE OPERATING LIMITS REPORT. Insertion limits do not apply during PHYSICS TESTS or during periodic exercise of individual rods. The shutdown margin specified in the Core Operating Limits Report must be maintained except for low power PHYSICS TESTING. For this test the reactor may be critical with all but one high worth full-length control rod inserted for a period not to exceed 2 hours per year provided a rod drop test is fun on the high worth full-length rod prior to this particular low power PHYSICS TEST.

PACKAGE 3.3

INSTRUMENTATION

PART D

DISCUSSION OF CHANGES (DOC)

to

PRAIRIE ISLAND CURRENT TECHNICAL SPECIFICATIONS

PRAIRIE ISLAND NUCLEAR GENERATING PLANT UNITS 1 AND 2

Improved Technical Specifications Conversion Submittal

PART D

PACKAGE 3.3

INSTRUMENTATION

DISCUSSION OF CHANGES TO CURRENT TECHNICAL SPECIFICATIONS

The proposed changes to PI Operating License Appendix A, TS are discussed below and the specific wording changes are shown in Parts B, C and E.

For ease of review, all package parts and discussions are organized according to the proposed PI ITS Table of Contents.

NSHD category	Change number 3.3-	Discussion Of Change
A	001	The current format for the CTS includes Applicability and Objective statements at the beginning of each TS Section. For most of the TS Sections, these statements are vague and do not provide meaningful information in the ITS format and therefore, these statements are not included in the ITS. Since these general CTS statements do not establish any regulatory requirements and are incorporated in a broad sense in the ITS, these are considered administrative changes.
		A few Sections, such as CTS 3.15, have been revised to conform to NUREG-1431 guidance and the Applicability statement is meaningful and will be addressed in the discussion of those Sections.
	\$	

Prairie Island Units 1 and 2

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NSHD category	Change number 3.3-	Discussion Of Change
A	002	2.3.A.3.d. Since this is simply a reference to another section in the CTS, this statement is not included in the ITS. Since no substantive information is included, this is an administrative change.
LR		2.3.C. Control Rod Stops are not instrumentation used to detect RCS leakage, they are not a design feature that assumes the failure of or presents a challenge to the integrity of a fission product barrier, they are not a system that is part of the primary success path to mitigate a design basis accident nor have they been shown to be significant to public health and safety. Since the control rod stops do not meet the TS Selection Criteria of 10CFR50.36, they have been relocated to the TRM. This is acceptable since the TRM is part of the USAR and therefore is under the regulatory controls of 10CFR50.59. Since the TRM is under licensee control this is a less restrictive change. This change conforms to the guidance of NUREG-1431.
A	004	3.5.A, 3.5.B, 3.15.B, 4.1.A, 4.1.B, and 4.1.C. The CTS introductory statements which direct the TS user to the Tables which contain the Specification limits are not included. These statements are not necessary in the ITS format which contains all required references for internal guidance and consistency. This is an administrative change since these statements are not substantive and the ITS is complete without them.
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Part D

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NSHD category	Change number 3.3-	Discussion Of Change
A	005	Tables 3.5-2A and 3.5-2B. The column heading has been revised to "Required Channels" to be consistent with the guidance of NUREG-1431. Functionally, the same number of channels is used and therefore this is an administrative change.
A	006	Tables 3.5-2A and 3.5-2B. The columns titled, "Channels to Trip" and, "Minimum Channels Operable" have not been included in the ITS. The format of the ITS and the individual Action Statements within the ITS Conditions provide an indication of the number of channels which may be inoperable or the number which are allowed to be operable. For most of the functions in these tables, these format changes make these columns unnecessary and thus these columns are not included. Since this does not involve substantive changes, this is an administrative change. This change is consistent with the guidance of NUREG-1431. In a few instances, the ITS format change does not accurately define the limits provided in the CTS. Those instances are individually addressed in separate Discussion

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NSHD category	Change number 3.3-	Discussion Of Change
A	007	Tables 3.5-2A, 3.5-2B, and 3.15-1. The CTS Action Statement references have all been replaced the ITS Action Statement references. The CTS and ITS Action Statements do not have a simple one-to-one correspondence to each other. Any change in the Action Statement as it applies to the Table function is addressed in separate Discussion of Changes with the individual CTS Action Statement. Therefore this is an administrative change.

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Table 3.5-2A, Function 6, Table 4.1-1A, Function 6. To be consistent with the guidance of NUREG-1431, the general collective titles of the applicable modes for these requirements have not been included in the ITS. The applicable modes are specifically defined in the table and do not need to be described in the function title. Since no plant operational requirements are changed, this is an administrative change.

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Change number **Discussion Of Change** 3.3-009 Table 3.5-1, Function 10. The actual title for the time delays has been included to provide clarity on which time delays are under consideration. The time range for degraded voltage DG start time delay (Time Delay 2) has been narrowed to reflect the actual time delay implemented at PI. When new

> DG were installed in 1992 a large time delay was specified due to lack of operating experience with this new plant feature. Since the time delay range is narrower, this is a more restrictive change. This change is acceptable since it will assure that the plant operates with the proper time delay

LR 010 Table 3.5-1, Function 8 and Table 4.1-1C, Function 24. The Steam Exclusion System (SES) actuation instrumentation and the associated setpoint have been relocated to the TRM. This is acceptable because the TRM will require this instrumentation to be operational. Since the TRM is licensee controlled, this is a less restrictive change. Changes to the TRM will continue to be under the regulatory controls of 10 CFR 50.59.

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Table 3.5-2A and Table 4.1-1A, Function 5, new note. For consistency with NUREG-1431, the Applicable Modes is modified by a note which limits the applicability in Mode 2 to above P-6. Since Mode 2 above P-6 is the only time that the intermediate range neutron flux is operational, the addition of this clarifying note is an administrative change.

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NSHD category	Change number 3.3-	Discussion Of Change
Μ	012	Table 3.5-2A, Note a and Table 4.1-1A, Note 1. This note was modified to be consistent with ITS Table 3.3.1-1 Note a and the guidance of NUREG-1431. This change is more restrictive since it now includes the condition when one or more rods are not fully inserted. The other changes to this note provide clarification, but do not change the note substantively. This change is acceptable since it requires the affected portions of the reactor trip system to be operable under additional conditions which may improve the safety of plant operations.
L	013	Table 3.5-2A and Table 4.1-1A, Functions 9, 11, 12, 13, 15, 16 and applicable Required Actions, new notes. The Applicable Modes for these functions are modified by notes which limit the Mode of Applicability of the specification consistent with the guidance of NUREG-1431. The Required Actions are modified to place the plant in the out-of-limit portion of the Mode of Applicability as remedial action. These changes are less restrictive since they further limit the applicability of the specification and may allow the plant to remain at a higher power level. These changes are acceptable since these functions are not assumed for the mitigation of any accident in the out-of-limit portion of the Mode of Applicability removes the plant from the Mode of Applicability removes the plant from the Mode or other conditions of Applicability. Thus these

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the Mode or other conditions of Applicability. Thus these functions, in the out-of-limit portion of the Mode of Applicability, are not required and do not meet the TS Selection Criteria.

Prairie Island Units 1 and 2

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NSHD category	Change number 3.3-	Discussion Of Change
A	014	Table 3.5-2A, Functions 19 and 20, Note (d), and Table 4.1- 1A, Functions 19 and 20 and Notes (15) and (16). In conformance with the guidance of NUREG-1431, the Reactor Trip Bypass Breakers have been included with the Reactor Trip Breaker rather than listed as a separate function. Since all specification requirements have been retained in the TS this is an administrative change.
М	015	New Function 16 in Table 3.5-2A and Table 4.1-1A. In conformance with the guidance of NUREG-1431, a new Function 16 has been provided to include Reactor Trip System Interlocks, including appropriate Required Channels, Applicable Modes and Action Statements. Since this includes new specification requirements, this is a more restrictive change. This change is acceptable since it places additional requirements on plant operations that assure safe plant operation. This change does not create any unsafe plant conditions since the new TS requirements are consistent with current plant operating practices.

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Part D		Package 3.3
NSHD category	Change number 3.3-	Discussion Of Change
М	016	New Function 18 in Table 3.5-2A and Table 4.1-1A. In conformance with the guidance of NUREG-1431, a new Function 18 has been provided to include RTB Undervoltage and Shunt Trip Mechanisms, including appropriate Required Channels, Applicable Modes and Action Statements, as a separate Function. Since this includes new specification requirements, this is a more restrictive change. Table 4.1-1A Note 12 no longer applies to Function 19 because of the new Function 18. A new Note (j) is included to clarify to which breakers this function applies. This change is acceptable since it places additional requirements on plant operations that assure safe operation of the plant. This change does not create any unsafe plant conditions since the new TS requirements are consistent with current plant operating practices.
Μ	017	Table 3.5-2A, Note d and Table 4.1-1A Note 16. This note was modified to be consistent with ITS Table 3.3.1-1 Note i and the guidance of NUREG-1431. This change is more restrictive since it now applies any time the RTBB is racked in and closed, whether or not the control rod system is capable of withdrawal. The other changes to this note provide clarification, but do not change the note substantively. This change is acceptable since it requires the affected portions of the reactor trip system to be operable under additional conditions which may improve the safety of plant operations.

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Part D		X 994		Package 3.3
NSHD category	Change number 3.3-		Discussion Of Cha	nge
Α	018	Statements are content guidance not add or remo administrative c		tent with the format and ince these changes do nts, these are s which do affect TS
A	019	The title of this f with the guidance Interlock". The as a separate fu are addressed i	inction and any chang n the Discussion of Ch fore, this title change i	sed to be consistent deleting "and erlocks are addressed es in TS requirements nange for this new
A	020	1B, Function 5d be consistent w Steam Flow Sig changes are jus	ith proposed LAR entit	s have been revised to tled, "Remove High I Logic." Since these , they are considered

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Package 3.3

NSHD category	Change number 3.3-	Discussion Of Change
A	021	Table 3.5-2A and Table 3.5-2B, Actions. The CTS Action Statements Mode titles have been replaced with the Mode numbers for consistency with NUREG-1431. Since the applicable Mode has not been changed, this is an administrative change. Also the Completion Times have been changed to require action times in total hours consistent with NUREG-1431 rather than the next increment of time as given in the CTS. Since the actual time to perform the actions is not changed this is also an administrative change.
L	022	Table 3.5-2A, Actions 2 and 6, and Table 3.5-2B, Actions 21, 24 and 29. A new Required Action is included within these action statements to provide guidance when the CTS Required Actions are not met. This change is included in accordance with the guidance of NUREG-1431. In the CTS, if the Required Actions are not met, the plant would be required to enter CTS LCO 3.0.C (ITS LCO 3.0.3) which would require plant shutdown to MODE 5. This new Required Action allows the plant to avoid shutdown to MODE 5 and therefore this change is less restrictive. This change is acceptable, since the new Required Action places the plant in a safe condition in a Mode which is at a lower power level and outside the Mode of Applicability for the Specification.

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NSHD category	Change number 3.3-	Discussion Of Change
A	023	Table 3.5-2A, Action 3. CTS Required Actions for instrument inoperability prior to entering the Mode or other conditions of Applicability are not included. In accordance with ITS LCO 3.0.4, the plant can not change Modes to a higher power level with inoperable equipment, unless a specific exemption is stated. Since an exemption is not stated, this Required Action is unnecessary in the ITS and this is an administrative change.
L	024	Table 3.5-2A, Action 3. The Required Action when one intermediate range neutron flux channel is inoperable is modified to require the plant to reduce power or increase power so the plant is outside the Mode or other conditions of Applicability for this instrumentation. This change is consistent with the guidance of NUREG-1431. Since this change may allow plant startup to continue with an inoperable instrument channel, this is a less restrictive change. This change is acceptable, since this is a backup reactor trip which is not credited in any plant safety analyses. Safety is also assured since the plant continues to have the function of the redundant operable channel and the probability of its failure is low during the period when the power is increased. When the power is below P-6 or above P-10, the plant does not require intermediate range neutron flux instrumentation for safe operation.

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Part D		Package 3.3
NSHD category	Change number 3.3-	Discussion Of Change
L	025	Table 3.5-2A, New Action G. CTS Table 3.5-2A, Action 3 allows for a single channel of the Intermediate Range Neutron Flux instrumentation to be inoperable. New Required Actions are included to address the condition when two intermediate range neutron flux channels are inoperable. Since CTS does not provide any guidance for this condition, CTS LCO 3.0.C (ITS LCO 3.0.3) would be required to be entered. LCO 3.0.C requires the plant to be in MODE 3 within 7 hours. The new CTS action, ITS Required Actions G.1 and G.2, require immediate suspension of operations involving positive reactivity additions and reduction in power below P-6 within 2 hours. Since this allows the plant to remain critical, this is a less restrictive change. This change is acceptable since the safety analysis does not credit the Intermediate Range channels. The plant can safely remain critical below P-6 indefinitely since this is outside and below the Modes of Applicability for the Intermediate Range channels. Furthermore, this change provides additional plant safety by requiring actions applicable to this specific condition, that is, suspension of operations involving reactivity additions. This change is consistent with the guidance of NUREG-1431 as modified by approved traveler, TSTF-286, Revision 2.

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NSHD categoryChange number 3.3-Discussion Of ChangeM026Table 3.5-2A, New Action I. A new action is included to address the condition when two source range neutron flux channels are inoperable. CTS does not provide any specific guidance for this condition and therefore LCO 3.0.C would be entered. This is a more restrictive change since the ITS requires the reactor trip breakers to be immediately opened. This action assures the plant is operated in a safe manner. This change is acceptable since it is consistent with current plant practices to operate the plant in a conservative manner.A027Table 3.5-2A, Actions 5 and 8. This Action Statement has been modified to provide the option of initiating action to	·		
 address the condition when two source range neutron flux channels are inoperable. CTS does not provide any specific guidance for this condition and therefore LCO 3.0.C would be entered. This is a more restrictive change since the ITS requires the reactor trip breakers to be immediately opened. This action assures the plant is operated in a safe manner. This change is acceptable since it is consistent with current plant practices to operate the plant in a conservative manner. A 027 Table 3.5-2A, Actions 5 and 8. This Action Statement has 		number	Discussion Of Change
	М	026	address the condition when two source range neutron flux channels are inoperable. CTS does not provide any specific guidance for this condition and therefore LCO 3.0.C would be entered. This is a more restrictive change since the ITS requires the reactor trip breakers to be immediately opened. This action assures the plant is operated in a safe manner. This change is acceptable since it is consistent with current plant practices to operate the plant in a conservative
insert all rods and prevent rod withdrawal in lieu of opening the RTBs. These changes are consistent with the guidance of NUREG-1431 as modified by approved traveler, TSTF- 135. These changes provide plant protection which is equivalent to that provided in the CTS therefore this is an administrative change.	Α	027	been modified to provide the option of initiating action to insert all rods and prevent rod withdrawal in lieu of opening the RTBs. These changes are consistent with the guidance of NUREG-1431 as modified by approved traveler, TSTF- 135. These changes provide plant protection which is equivalent to that provided in the CTS therefore this is an

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NSHD category	Change number 3.3-	Discussion Of Change
A	028	CTS 2.3.B.1, 2.3.B.2, 2.3.B.2.a, 2.3.B.2.b, 2.3.B.4, and 2.3.B.5. CTS uses a mixture of "unblocked" and "blocked" terminology when describing the use of the reactor trip interlocks. The specific terminology used determines the direction of the inequality on the allowable value. To be consistent with NUREG-1431, only the term "blocked" is used and the direction of the inequality has been reversed where "blocked" has replaced "unblocked". This change only involves a change in terminology and convention, and does not cause any change in plant operation, limits or testing. Since there are no substantive changes, this is an administrative change.
A	029	CTS Table 3.5-2A, Actions 1, 7, 8, 9, and 10, and Table 3.5-2B, Actions 20, 23, 25, and 28. The format for CTS and ITS fundamentally differ in the presentation of shutdown tracks in that the CTS states the incremental time to shut down to the next MODE. ITS shutdown tracks state the total time within which the next MODE must be entered. The total Completion Time for both format is the same. The CTS format has been changed to the ITS format. Since there is no net change in plant operations, this is an administrative change.

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Part D	·	Package 3.3
NSHD category	Change number 3.3-	Discussion Of Change
L	030	CTS Table 3.5-2A, Action 4. CTS requires suspension of ". all operations involving positive reactivity changes" when one Source Range Neutron Flux channel is inoperable. ITS requires suspending operations involving reactivity additions and further clarifies that cooldown or boron dilution is allowed when it is accounted for in the calculated SDM. The specified SDM assures that the reactor will remain subcritical, and thus safe. This change is acceptable because plant safety is assured by meeting the SDM requirements during allowed reactivity changes. This change is less restrictive since it allows additional plant operating flexibility. This change is consistent with the guidance of NUREG-1431 as modified by approved TSTF- 286, Revision 2.

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Part D

NSHD category	Change number 3.3-	Discussion Of Change
L	031	CTS 2.3.A.2.a, 2.3.A.2.b, 2.3.A.2.c, 2.3.A.2.f,2.3.A.2.g, 2.3.A.2.i.1, 2.3.A.2.i.2, 2.3.B.2.b, 2.3.B.3, 2.3.B.4, Table 3.5- 1, Functions 3 and 5.
		CTS Section 2.3, "Limiting Safety System Settings, Protective Instrumentation," provides limits for RCS protective instrumentation. Most of these limits were established prior to Unit 1 startup in December 1973. These limits do not serve a uniform purpose in PI operations; that is, some of these values may be Limiting Safety System Settings, some may be Allowable Values, some may be Analytical Limits, and some may be Nominal Trip Setpoints as the nuclear industry now understands these terms consistent with approved traveler, TSTF-355, Revision 0. These values do have a commonality in that they all provide for instrument uncertainty. CTS Table 3.5-1, "Engineered Safety Features Initiation Instrument Limiting Set Points" provides limits for Engineered Safety Features instrumentation. Most of these limits were also established prior to Unit 1 startup in December 1973. These limits do not have a regulatory definition and thus have been characterized as "limiting set points". Like the values in CTS Section 2.3, these values also provide for instrument uncertainty.
	· · · · · · · · · · · · · · · · · · ·	The NRC recognizes that the methods for treatment of instrument uncertainty have evolved over the years. This evolution of the treatment of instrument uncertainties is discussed in NUREG-0138, "Staff discussion of fifteen technical issues listed in attachment to November 3, 1976 Memorandum from Director NRR to NRR Staff." As discussed in NUREG-0138, prior to October 1974 a generalized method of addressing instrument uncertainty for

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NSHD category	Change number 3.3-	Discussion Of Change	
L	031	(continued)	

instrumentation setpoints was used. This method was described as the following: "In this approach, the discrete components of each of the margins to safety in trip setpoint values are not evaluated on an individual basis but are included in an overall safety margin. Each setpoint value is based upon the most limiting transient or postulated accident condition associated with the bases for that setpoint. The magnitude of this safety margin and the resulting setpoints are established to ensure that there is a low probability of the margin being removed by an adverse combination of instrument calibration error, instrument error and instrument drift. The Staff believes that this method is acceptable."

The NRC Staff, in NUREG-0138, proceeded to delineate their future intention for the treatment of instrument uncertainties for instrument setpoints in the Technical Specifications. The NRC Staff concluded in this NUREG the following: "The staff is, however, changing from a generalized method of trip setpoint evaluation to a method that considers each of the discrete factors that make up the margins of safety for each safety related instrumentation channel. Either method contains conservatism; however, the newer method will allow the safety margin in the trip setpoints to be quantified in a more detailed manner. In addition, consideration of instrument error will be explicit in the newer method, whereas previously it was an implicit assumption presumed to be considered as part of the overall margin." Guidance which embodies NRC acceptable methods for determining instrumentation setpoints for safetyrelated Technical Specification Limiting Safety System Settings (LSSS) is documented in Regulatory Guide 1.105, industry standard ISA S67.04 and associated practices, and subsequent plant specific methodology approvals. NRC espousal of setpoint methodology employing discrete factors

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NSHD category	Change number 3.3-	Discussion Of Change
L	031	(continued)
		in the margins of safety is evidenced in NUREG-1431, Revision 1 Section 3.3 Specifications and Bases, as modified by approved traveler, TSTF-355.
~ ~		In support of the conversion of Prairie Island Technical Specifications to conform to the guidance of NUREG-1431, as modified by TSTF-355, PI developed a detailed setpoint methodology, "Engineering Manual Section 3.3.4.1, Engineering Design Standard for Instrument Setpoint/Uncertainty Calculations," (Methodology) in accordance with the guidance of Regulatory Guide 1.105 and ISA S67.04 and associated practices. This Methodology provides the allowable value for each of the instruments in Specifications 3.3.1, 3.3.2 and 3.3.4. Some of these allowable values are coincident with the CTS values and no change is indicated. Many of the allowable values differ in an apparent more conservative direction while others have moved to an apparent less conservative value. Since there are apparent changes in both directions, these are considered less restrictive changes.
		These changes have been characterized as "apparent" changes since it can be argued that there have not been real changes in the plant margins of safety. The intent of the Methodology is to maintain or improve the current plant margins of safety. However, some values presented in the ITS have changed because: 1) these values are now all consistent as "allowable values" whereas in CTS the presented values may serve differing purposes; and 2) the CTS values are based on early 1970's generalized methods for addressing instrument uncertainty whereas ITS values are based on the Methodology using discrete components

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Part D		Package 3.3
NSHD category	Change number 3.3-	Discussion Of Change
L	031	(continued)
		for each margin of safety which is consistent with current industry practices. Thus, where ITS uses apparently more conservative values, the CTS is not deficient because the methodology is different and was acceptable at the time these values were established. Where ITS uses apparently less conservative values, the ITS is acceptable because these values have been established using methodology in accordance with current NRC and industry guidance, and maintain or improve the current plant margins of safety. These changes are also consistent with the guidance of NUREG-1431 as modified by approved traveler, TSTF-355.
Μ	032	Table 3.5-2A, Action 9. The Required Actions of Part a. of this Action Statement has been modified to be consistent ITS LCO 3.3.1 Condition S which conforms with the guidance of NUREG-1431. The maintenance exception of Part a. of this Required Action is included with Note 2 in Condition P. CTS allow the breaker to be bypassed to perform maintenance and testing to restore the diverse trip feature to operable status without any stated time limit. As ITS Condition P Note 2, the time the breaker may be bypassed is limited to 4 hours, thus this is a more restrictive change. Providing a specific time limit is acceptable and does not cause an unsafe plant condition since most maintenance and testing would normally be performed in this time frame.

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Part D		Package 3.3
NSHD category	Change number 3.3-	Discussion Of Change
. L	033	Table 3.5-2A, Action 9 Part b. and Action 10. These Action Statements have been modified to be consistent with ITS LCO 3.3.1 Condition P which conforms with the guidance of NUREG-1431. The changes include an additional hour to restore an inoperable breaker to operable status prior to initiating plant shutdown to MODE 3 and therefore this is a less restrictive change. These changes are acceptable since some time should be allowed to attempt restoration and one hour is consistent with the provisions of CTS LCO 3.0.C (ITS LCO 3.0.3). Allowing the one hour may avoid a plant shutdown evolution which has attendant risks.
A	034	Table 3.5-2A, Action 10. The provisions of this Action Statement which address an inoperable RTBB prior to use are not included. The ITS rules of use do not permit placing inoperable equipment into service; therefore these provisions are unnecessary. Since this change does not affect plant operations, this is an administrative change. This change conforms to the guidance of NUREG-1431.
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NSHD category	Change number 3.3-	Discussion Of Change
A	035	Table 3.5-2B, Functions 1e, 2c, 3c, 4f, 5e, 6d, and 7f, Table 4.1-1B, Functions 1e, 2c, 3c, 4f, 5e, 6d, and 7f. The title of the logic portion of these instrumentation systems is revised to more accurately describe the function at PI. PI has relay logic and does not have actuation relays as a separate part of the logic function; thus the title, "Automatic Actuation Relay Logic" is more correct. The CTS title is the same as the NUREG-1431 title due to an LAR to conform to the guidance of the NUREG. However, this title is incorrect and misleading. Since no changes in function, testing or other TS requirements are involved, this is an administrative change.
L	036	Table 3.5-2B and Table 4.1-1B, Function 1.b. CTS Applicability for this function in MODE 4 is not included in the ITS which is consistent with the guidance of NUREG-1431. This change is acceptable since there are no accident analyses which credit SI performance in MODE 4. Furthermore, there is insufficient energy in the primary or secondary systems to pressurize the containment and the operators will have sufficient time to respond to an accident; thus automatic initiation of SI on high containment pressure in MODE 4 is unnecessary.
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NSHD category	Change number 3.3-	Discussion Of Change
L .	037	Table 3.5-2B and Table 4.1-1B, Function 2.b. CTS Applicability for this function in MODE 4 is not included in the ITS which is consistent with the guidance of NUREG-1431. This change is acceptable, since in MODE 4 there is insufficient energy in the primary or secondary systems to pressurize the containment to reach the High-High setpoint; thus automatic initiation of containment spray on high containment pressure in MODE 4 is unnecessary.
A	038	Table 3.5-2B, Note a and Table 4.1-1B, Note 21. This note has been modified to be consistent with NUREG-1431 Table 3.3.2-1 Note a. The meaning and use of this note is the same in both applications since it states that the function is not required below 2000 psig in the RCS. Since there is no change in the meaning or application, this is an administrative change.
A	039	Table 3.5-2B, Note b and Table 4.1-1B, Note 26. This note has been modified to be consistent with NUREG-1431 Table 3.3.5-1 Notes a and b. The meaning and use of this note is the same in both applications since it states that the function is required when containment integrity is required and during movement of irradiated fuel in containment when this system is operating. Since there is no change in the meaning or application, this is an administrative change.
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NSHD category	Change number 3.3-	Discussion Of Change
	040	Not used.
Α	041	A new note has been included to provide clarity to the plant operators that this RTS function does not provide a direct reactor trip.
L	042	Table 3.5-2B and Table 4.1-1B, Function 5. Applicability in MODE 2 for each element of this Function is modified by a note which does not require this specification to be applicable when both MSIVs are closed. Since this change limits the applicability of this specification, this is a less restrictive change. This change is acceptable since the steam line isolation safety function is met passively without this instrumentation operable in accordance with the Specification when both MSIVs are closed. This change conforms to the guidance of NUREG-1431.
A	043	Table 3.5-2B, Note c and Table 4.1-1B, Note 23. The format of this note has been revised to conform to the guidance of NUREG-1431. The note has been restated but has the same meaning, therefore this is an administrative change.

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Part D		Package 3.3
NSHD category	Change number 3.3-	Discussion Of Change
LR	044	Table 3.5-2B, Function 6c and Table 4.1-1B, Function 6c. The feedwater isolation on a reactor trip with 2 of 4 low T _{ave} function is not included in the ITS which is consistent with the guidance of NUREG-1431. This change is acceptable since this function does not detect RCS leakage, it is not a design feature that is an initial condition of a design basis accident, it is not a component or design feature that is part of the primary success path to mitigate a design basis accident and it has not been shown to be significant to public health and safety. Since it does not meet these criteria for a TS as defined in 10CFR50.36 it will be relocated to the TRM where it will be under the regulatory controls of 10CFR50.59. Since this function will be under licensee control, this is a less restrictive change.
L	045	Table 3.5-2B and Table 4.1-1B, Function 6. Applicability in

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Table 3.5-2B and Table 4.1-1B, Function 6. Applicability in MODE 2 for each element of this function is modified by a new note which does not require this specification to be applicable when all MFRVs and MFRV bypass valves are closed and in manual or isolated by a closed non-automatic valve. Since this change limits the applicability of this specification, this is a less restrictive change. This change is acceptable since the feedwater line isolation safety function is met passively without this instrumentation operable in accordance with the Specification when the conditions of the new note are met. This change conforms to the guidance of NUREG-1431.

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NSHD category	Change number 3.3-	Discussion Of Change
LR	046	Table 3.5-2B and Table 4.1-1B, Function 7a. The AFW manual initiation function is not included in the ITS which is consistent with the guidance of NUREG-1431. This change is acceptable since the manual AFW pump switch only starts the pump as opposed to actuating the system and manual operations of the pumps to support plant startup and cooldown will verify operability of the switches. This function will be relocated to the TRM where it will be under the regulatory controls of 10CFR50.59. Since this function will be under licensee control, this is a less restrictive change.
A	047	Table 3.5-2B, Function 7. The title for this function is changed to delete "4.16 kV" since this is unnecessary redundant information in the title. Since this is only a title change, this is an administrative change.
A	048	Table 3.5-2B, Footnote and Table 4.1-1B, new note. This note has been revised to agree more closely with the wording used in LCO 3.7.5. The meaning and applicability have not been changed, therefore this is an administrative change.
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NSHD category	Change number 3.3-	Discussion Of Change
Μ	049	Table 3.5-2B, Function 6d. To be consistent with the format and guidance of NUREG-1431, the feedwater isolation logic is required to be operable in Mode 3 (except as modified by the note) since these valves are required to close in response to an SI signal. This change imposes a TS requirement for this logic to be operable. Since this is a new TS requirement, this is a more restrictive change. This change is acceptable since it assures the plant is maintained in a safe condition. Also the plant design requires this logic
		to be operable when the SI logic is operable.
A	050	Table 3.5-2B, Function 9 and Actions 34, 35, and 36. This Specification requirement was deleted by LAR entitled, "Removal of Boric Acid Storage Tanks from the Safety Injection System," submitted April 17, 2000. Since this change was justified in that submittal, this is considered an administrative change in this submittal.
A	051	Table 3.5-2B and Table 4.1-1B, Function 7d. CTS subdivides this into two sub-functions for the turbine driven AFW pump and the motor driven AFW pump. However, the specification requirements for these two sub-functions are identical. Thus, in conformance with the guidance of NUREG-1431, this is presented as a single function. Since the specification requirements remain the same, this is an administrative change.
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NSHD category	Change number 3.3-	Discussion Of Cha	inge
М	052	Table 3.5-2B, Function 8. A new comprovided for the loss of power function function to be OPERABLE, "When as to be OPERABLE by LCO 3.8.2, 'AC Since this change places additional T plant operations, this is a more restrict change is acceptable since it is gene current plant practices and does not operated in an unsafe manner.	n which requires this ssociated DG is required Sources - Shutdown'." S requirements on ctive change. This rally consistent with
L	053	Table 3.5-2B, Action 22. In conformation of NUREG-1431, this action statement allow this system to continue operating one train of radiation monitoring inopy change may allow additional operating less restrictive change. This change usual to allow some time to operate we equipment inoperable when the redu and able to perform the safety function of the safety functi	nt has been modified to ng for up to 4 hours with erable. Since this ng flexibility, this is a is acceptable since it is with one train of ndant train is operable
A	054	Table 3.5-2B, Action 22. Since this s flanged and therefore not operating, modified to reference the specificatio operation. This change is only a clar change any specification requirement operations, therefore; this is an adm	this action statement is ns which govern its ification which does not ts or affect plant
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Prairie Islan Units 1 and		27	12/11/00

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NSHD category	Change number 3.3-	Discussion Of Change
A	055	Table 3.5-2B, Action 30. The last sentence of this action statement allows one channel to be bypassed for up to 8 hours for surveillance testing. This provision is not included in the ITS in accordance with the guidance of NUREG-1431. Due to the relay logic design of the AFW logic, this change does not change the capability to test this system; thus this is an administrative change.
A	056	Table 3.5-2B, Action 32. This Action Statement has not been included in the ITS. The LCO, action statements and required actions have been revised to be more technically correct by redefining the channels. Thus the condition when two channels are inoperable is addressed in CTS Action 33 and the required actions in CTS Action 32 are not applicable in this new format; thus, Action 32 is not included in the ITS. Since this change does not change any plant operating conditions, this is an administrative change.

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NSHD category	Change number 3.3-	Discussion Of Change
Μ	057	Table 3.5-2B, Action 33. This Action Statement has been revised to take the required action when two channels per bus are inoperable since the definition of channels has been redefined in the LCO to be more technically correct. Also, CTS requirements to declare the DGs out of service have been revised to declare the load sequencer out of service. These changes have been made to be more consistent with the philosophy of NUREG-1431 and provide an improved response to these plant conditions. Since this change will impact more plant equipment, this is a more restrictive change. This change will assure that the plant is maintained in a safe condition and does introduce any new safety concerns.
L	058	Table 3.5-2B, Action 21. CTS allows high-high containment pressure channels to be inoperable provided they are placed

ment blaced in a tripped position. However, with two channels in the tripped position, the containment spray system could actuate on a single spurious signal. The ITS will allow two channels to be inoperable with one channel tripped and one channel bypassed. This is desirable because it prevents the containment spray system from actuating on a single spurious signal. This change is acceptable since only two additional high-high pressure signals are required to actuate the system (compared to three normally). This change involves both more restrictive and less restrictive requirements; thus this is treated as a less restrictive change.

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NSHD category	Change number 3.3-	Discussion Of
М	059	CTS 3.7.A. Current TS do not ex

CTS 3.7.A. Current TS do not explicitly require the automatic load sequencers to be operable. For the purpose of completeness and consistency with NUREG-1431 requirements, new specification requirements including an LCO statement, action statements and supporting Bases have been included in the PI ITS. This new specification implements the intent of ISTS 3.8.1 and its action statements. However, as discussed in Part F, Change X3.3-312, this new specification requirement is included in PI ITS LCO 3.3.4. Since this is new specification requirement in the TS, this is a more restrictive change. This new specification requirement is consistent with current plant practices for equipment operability and testing and therefore will not cause any unsafe plant operations or testing.

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CTS Table 3.5-2B, Action 28. To be consistent with the guidance of NUREG-1431, a new requirement to reduce power to MODE 4 or shut the main steam isolation valves is included. This change is more restrictive in that it requires additional actions or reduction of plant power with 18 hours. This change is acceptable since it will maintain the plant in a safe condition and not introduce any unsafe plant operating conditions or tests.

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Part D

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NSHD category	Change number 3.3-	Discussion Of Change
Μ	061	New Required Actions, LCO 3.3.4, C and D, have been included to address plant conditions when an automatic load sequencer is inoperable. Since CTS do not have requirements for an inoperable load sequencer, this is a more restrictive change. These changes are included to make the ITS complete and technically accurate. These changes provide conservative management of the plant and assure that it is maintained in a safe condition. These changes do not introduce any new safety concerns.
A	062	3.15, Objective. The CTS Objective statement is not included in the ITS which is consistent with the guidance of NUREG-1431. An objective statement is not necessary since the ITS has detailed Bases which provide background on each specification. Since this statement does not provide operational restrictions or requirements, this is an administrative change.
A	063	3.15.C. The CTS statement which allows the plant to start up with inoperable Event Monitoring equipment has been revised to be consistent with the guidance of NUREG-1431. Since the meaning and applicability of the statement has not changed, this is an administrative change.
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NSHD category	Change number 3.3-	Discussion Of Change
Μ	064	3.15.D. The CTS statement which takes exception to CTS LCO 3.0.C (ITS LCO 3.0.3) is not included in the ITS which is consistent with the guidance of NUREG-1431. ITS LCO 3.0.3 provides TS guidance when no other guidance is provided and therefore exception is not taken for the possibility that ITS Specification 3.3.3 might not always provide the required guidance. This change is more restrictive since it may require plant shutdown if Specification

other TS guidance is available.

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065 Table 3.15-1, Function 9. The descriptive term "Penetration Flow Path" has been included which makes this Function name consistent with NUREG-1431 as modified by TSTF-295. This phrase is included to clarify the requirements for this function. Since changing the function name does not change any specification requirements, this is an administrative change.

3.3 requirements are not met or do not provide guidance for

requirement to comply with LCO 3.0.3 provides conservative actions to maintain the plant in a safe condition when no

all conditions. This change is acceptable since the

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Table 3.15-1, Actions 5 and 6. Minor wording changes were made to be consistent with the requirements included in the ITS. These changes do not change the requirements or applicability and therefore these are administrative changes.

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NSHD category	Change number 3.3-	Discussion Of Change	
L	067	Table 3.15-1, Note b. The phrase "or check valve with flow through the valve secured" has been included in the ITS to be consistent with NUREG-1431 guidance. Since this may provide operational flexibility, this change is less restrictive. This change is acceptable, since a check valve with flow through the valve secured provides a containment leakage prevention barrier equivalent to the other methods listed in this note.	
A	68	A new note has been included in the Event Monitoring Table to clarify that each core exit thermocouple (CET) is a channel. This allows the terminology of the 3.3.3 Conditions to be applied to the CETs. The name of Function 15 has changed "Thermocouples" to "Temperature" to be consistent with NUREG-1431. Since these changes do not introduce any technical changes, these are administrative changes.	
A	69	A new Condition H has been included to be consistent with the format guidance of NUREG-1431. Condition H requires entry into the ITS Table 3.3.3-1 as required by the other conditions. Since this change does not involve any technical changes, this is an administrative change.	
	70	Not used.	
	71	Not used.	
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NSHD category	Change number 3.3-	Discussion Of Change
Α	072	Table 4.1-1A and Table 4.1-1B. The column title, Functional Test, is deleted since it is not needed in the ITS format. Each SR is defined by the type of surveillance that is required. The SRs listed in this column may correlate to different types of tests such as TADOT, COT, or ALT; thus this column title is not appropriate. Since no plant operational requirements are associated with this change, this is an administrative change.
Μ	073	Table 4.1-1A, Function 2, 3, 6. To be consistent with the guidance of NUREG-1431, a note has been included with this SR which will require verification that interlocks P-6 and P-10 are in their required state for existing unit conditions and will require performance of the SR within 12 hours after reducing power below P-10 for power and intermediate range instrumentation and within 12 hours after reducing power below P-6 for source range instrumentation. Since this change may require additional performances of this SR and verification of additional equipment, this is a more restrictive change. This change is acceptable since performance of this SR does not compromise the safety of the plant.

Prairie Island Units 1 and 2

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NSHD category	Change number 3.3-	Discussion (Of Change
L	074	Table 4.1-1A, Function 5. The instrumentation has not been in change is consistent with the g which does not require respons instrumentation. This change is intermediate range trip is a bac analyses do not credit this instr reactor. Since less testing may restrictive change.	ncluded in the ITS. This juidance of NUREG-1431 se time testing for this is acceptable since the ckup function and the safety rumentation with tripping the
LR	075	Table 4.1-1A, Function 2a. CT quarterly calibration of this inst Function of Neutron Flux Powe has relocated these SRs (SR 3 Overtemperature Δ T (which is and Overpower Δ T Functions. the purpose of these SRs. Thi the SR will continue to be perfe	rumentation under the er Range - High Setpoint. ITS 3.3.1.3 and 3.3.1.6) to consistent with NUREG-1431) This is more appropriate for s change is acceptable since
Μ	076	Table 4.1-1A, Function 7, 8. The included for these functions to guidance of NUREG-1431. The with the SRs for the Power Rate instrumentation. Since these are more restrictive characceptable since they are inclusively performed for the plant and do concerns.	be consistent with the lese SRs are also consistent nge Neutron Flux are included in the TS as SRs, nges. These changes are ided in SRs currently
Prairie Island Units 1 and 2		35	12/11/00

Part	D
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NSHD category	Change number 3.3-	Discussion Of Change
L	077	Table 4.1-1A, Function 13. The CTS requirement to calibrate the Turbine Stop Valve Closure has not been included to be consistent with the guidance of NUREG-1431. This change is acceptable since the stop valve is either open or closed and therefore there is not any instrumentation which requires calibration.
	78	Not used.
	79	Not used.
	80	Not used.
Α	081	Table 4.1-1A, Functions 15, 16b. This CTS test is modified by a note which states that verification of setpoints is not required. The test with which this note has been included is

required. The test with which this note has been included is a TADOT on the RCP undervoltage and underfrequency relays. Setpoint verification is not required by CTS; thus this note is simply a clarification and no substantive changes are involved. Therefore, this is an administrative change.

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N S D L L	Change		
NSHD category	Change number 3.3-	Discussion Of Change	e
L	082	Table 4.1-1A, Function 16. To be consist guidance of NUREG-1431, the CTS requ the RCP Breaker Open function has not change is acceptable since the RCP Bre or closed and therefore there is not any is which requires calibration.	uirement to calibrate been included. This aker is either open
L	083	Table 4.1-1A, Function 16. The CTS rec functionally test the RCP Breaker Open to prior to each startup after the reactor has more than 2 days if not tested in the prev been replaced by the requirement to per 24 months (during a refueling outage) while with the guidance of NUREG-1431. This acceptable since this equipment usually the ITS and CTS requirement is nearly the some additional testing may be required	trip instrumentation s been shutdown for vious 30 days has form this SR every hich is consistent s change is passes this test and
		there are intermediate cycle shutdowns of testing may be required this is a less res	of a unit. Since less
		there are intermediate cycle shutdowns of	of a unit. Since less
		there are intermediate cycle shutdowns of	of a unit. Since less
		there are intermediate cycle shutdowns of	of a unit. Since less
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NSHD category	Change number 3.3-	Discussion Of C	Change
A	084	Table 4.1-1A, Functions 18, 19. T perform response time testing of t interlock logic and reactor trip brea ITS since this time is included in th other required response time tests consistent with the guidance of NU just a different presentation of the requirements and these times will with the individual reactor trip resp administrative change.	he automatic trip and akers is not included in the he time recorded for the s and this presentation is JREG-1431. Since this is response time testing continue to be measured
Α	085	Table 4.1-1A, Table 4.1-1B, Table with the format and content guida definition of frequency notations is The ITS clearly specifies SR frequ hours, days, months or years as a notation; thus this information is u substantive changes have been m is an administrative change.	nce of NUREG-1431, the s not included in the ITS. uencies in the number of appropriate without use of unnecessary. Since no
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NSHD category	Change number 3.3-	Discussion (Of Change
Ĺ	086	removes the requirement to pershutdown for 2 days when the the last 30 days, which is less	stent with the guidance of equires performance of the SR estrictive than the CTS. It also erform the SR if the unit is SR has not been performed in restrictive. Since the change estrictive elements, this change tive change. This change is nation usually passes this SR obvious if this instrumentation en measures are taken to hus performance of the SR
Μ	087	Table 4.1-1A, Note 4. The CT SR has been modified to be co NUREG-1431 as modified by a except that the CTS provision for 2 days is included. With this continue to require performance shutdown more than 2 days ar previous 31 days. However, n be performed prior to exceeding restrictive change. This chang performance of this SR will not operated in an unsafe manner.	onsistent with the guidance of approved TSTF-311, Rev. 0 for the reactor to be shutdown is change, the note will ce of the SR if the reactor is nd if not performed in the ow the note requires the SR to ng P-9; thus this is a more be is acceptable since t cause the plant to be
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Units 1 and 2		39	12/11/00

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NSHD category	Change number 3.3-	Discussion Of Change
Μ	088	Table 4.1-1A, Note 6. This note has been modified to require performance of the SR prior to exceeding 75% RTP after each refueling which is consistent with current plant practice and is proposed in lieu of NUREG-1431 requirement to perform this SR within 24 hours. CTS does not require the SR to be performed within any specific time, thus this is a more restrictive change. This change is acceptable since this power level limit is consistent with current plant practices and performance of this SR prior to 75% power does not cause the plant to be operated in an unsafe manner.
	89	Not used.
	90	Not used.
Μ	091	Table 4.1-1A, Note 5. This note has been modified to require performance of the SR within 12 hours of reaching 15% RTP which is consistent with the guidance of NUREG- 1431. CTS does not require the SR to be performed within any specific time; thus this is a more restrictive change. This change is acceptable since this time frame is consistent with current plant practices, and performance of this SR within this specific time does not cause the plant to be operated in an unsafe manner.
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Part	D
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NSHD category	Change number 3.3-	Discussion Of Change
M	092	Table 4.1-1A, Note 8. This note has been modified to require performance of the SR within 24 hours of reaching the stated percentage of RTP which is consistent with the guidance of NUREG-1431. CTS does not require the SR to be performed within any specific time; thus this is a more restrictive change. This change is acceptable since this time frame is consistent with current plant practices, and performance of this SR within this specific time does not cause the plant to be operated in an unsafe manner.
L L	093	Table 4.1-1A, Note 6. This note has been modified to require recalibration if the absolute difference is greater than 3% which is consistent with the guidance of NUREG-1431. CTS requires recalibration if the difference is greater than 2%. Since this change will allow more flexibility in plant operations, this is a less restrictive change. This change is acceptable since CTS value of 2% was based on engineering judgement and a 1% change is a small difference from the nominal power level.
A	094	Table 4.1-1A, Note 7. This is a minor editorial change to make the sense of the requirement consistent with the guidance of NUREG-1431. This change does not involve any substantive changes and thus this is an administrative change.
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Prairie Island Units 1 and 2

Part D

NSHD category	Change number 3.3-	Discussion Of Cha	ange
A	095	Table 4.1-1A, Note 9 and Table 4.1- requirement for Staggered Test Basi been modified to agree with the guid The test frequency for these SRs rer because the definition of STB differs such that the result is that each train month under both CTS and ITS. Sin the frequency with this change, this i change.	is (STB) testing has ance of NUREG-1431. mains unchanged between CTS and ITS is tested every other ice there is no change in
LR	096	Table 4.1-1A, Note 10. The CTS deverification of permissives is perform Bases consistent with the guidance of detail is not necessary in the specific relocated. Since less information is specification, this change is less rest	ed is relocated to the of NUREG-1431. This cations and thus is provided in the
	97	Not used.	
	98	Not used.	
	99	Not used.	
	100	Not used.	
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Prairie Island		42	12/11/00

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NSHD category	Change number 3.3-	Discussion Of Change
LR	101	Table 4.1-1A, Notes 13 and 14. These CTS notes have been relocated to the Bases. These notes provide details of "what and how" SRs are performed on the undervoltage and shunt trip mechanisms. These notes are not necessary in the specification for the proper performance of these SRs, and consistent with the guidance of NUREG-1431, these notes are relocated to the Bases. Since less information is provided in the specifications, this is a less restrictive change.
LR	102	Table 4.1-1A, Note 18. CTS SR requirements for the quadrant power tilt monitor have been relocated to the TRM. This change is consistent with the guidance of NUREG-1431 which does not include any SRs for core monitoring equipment. This change is also consistent with approved TSTF-110, which relocated core monitoring equipment from other NUREG-1431 Specifications. Since this change removes equipment from the TS, this is a less restrictive change. This change is acceptable since it will still be under the regulatory controls of 10CFR50.59 in the TRM.
	103	Not used.

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Part D

NSHD category	Change number 3.3-	Discussion Of Change
L	104	Table 4.1-1A, New note. A new note has been included which allows this instrumentation to be tested each refueling (24 months) on a Staggered Test Basis (STB). This change is consistent with the guidance of NUREG-1431. Since this change requires less frequent testing of plant equipment, this is a less restrictive change. This change is acceptable because this instrumentation usually meets the test acceptance criteria when the test is performed.
Μ	105	Table 4.1-1A and Table 4.1-1B, New note. A new note has been included which requires verification that the time constants associated with this instrumentation are adjusted to the prescribed values when the SR is performed. This change is included to be consistent with the guidance of NUREG-1431 (SR 3.3.1.10 and 3.3.2.7) and current plant practices (SR 3.3.1.11 and 3.3.1.12). Since this is a new explicit requirement in the TS this is a more restrictive change. Since this requirement is consistent with current plant practice, it does not introduce any new unsafe operating conditions.
Μ	106	CTS Table 4.1-1B, Function 6d. To be consistent with the guidance of NUREG-1431, the Feedwater Isolation Logic is required to be functional in MODE 3 except when the
		MFRVs and MFRV bypass valves are closed. This change is more restrictive since the logic is required to be operational in more modes. This change is acceptable since having the logic operational in MODE 3 may increase plant safety.
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Units 1 and 2

Part	D
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NSHD category	Change number 3.3-	Discussion Of Change
Α	107	Table 4.1-1B, Note 25. This note which references CTS Table 4.17-2 has not been included in the ITS. CTS Table 4.17-2 was removed from the CTS by License Amendments 122/115 dated January 24, 1996. Since this change does not involve any substantive changes, this is an administrative change.
Μ	108	Table 4.1-1A, Note 16. A new requirement is included which requires the Reactor Trip Bypass Breaker to be tested when it is placed in service. Since this is not an explicit requirement in CTS, this is a more restrictive change. This change is acceptable since it will assure that the breaker functions properly when it is placed in service and thus will ensure that the plant operates safely.
A	109	CTS Table 4.1-1B, new note 28. To be technically accurate and consistent with the guidance of NUREG-1431, a new note is provided which clarifies that verification of the setpoint is not required by this surveillance. This note is appropriate since this SR applies only to manual switches which do not have any associated setpoints. Thus, this new note does not introduce any substantive change in plant operations or tests. Accordingly this change is an administrative change.
	110	Not used.
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Prairie Island Units 1 and 2

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Part D

NSHD category	Changè number 3.3-	Discussion Of Change
	111	Not used.
LR	112	Table 4.1-1C, Function 6. The RHR pump flow function has been relocated to the TRM which is consistent with the guidance of NUREG-1431. The RHR pump is required to be OPERABLE in accordance with LCO 3.5.2 which includes instrumentation. Since this instrumentation is not a primary success path for mitigation of an accident, it is unnecessary to have this instrumentation listed separately in the TS. This instrumentation will continue to be under regulatory controls through 10CFR50.59. Since this instrumentation has been removed from TS controls, this is a less restrictive change.
L	113	Table 4.1-1C, Function 8. The weekly check of the RWST level instrumentation has been replaced by a monthly check which is consistent with the guidance of NUREG-1431. The monthly functional check of this instrumentation has been deleted which is also consistent with the guidance of NUREG-1431. Changing to monthly channel checks is acceptable since this instrumentation usually is functional during the weekly check and it is in the control room where it is normally observed on a frequent basis even if not required by TS. Deleting the monthly functional test of this instrumentation is acceptable since this is a simple instrumentation loop involving only indication. Thus, the functional test required by CTS is not meaningful and can be deleted to be consistent with NUREG-1431. Since these changes remove plant testing requirements, these are less restrictive changes.

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NSHD category	Change number 3.3-	Discussion Of Change
A	114	Table 4.1-1C, Functions 5, 7, 9 and 12 and Note 33. These Specification requirements were deleted by LAR entitled, "Removal of Boric Acid Storage Tanks from the Safety Injection System," submitted April 17, 2000. Since these changes were justified in that submittal, these are considered administrative changes in this submittal.
LR	115	Table 4.1-1C, Functions 13, 15, 16, 17, 19, 20, 26, 27, 28, 30, and 31. These instruments have been relocated to the TRM which is by reference part of the USAR. These instruments are not included in NUREG-1431 and thus this change is consistent with its philosophy and guidance. This change is acceptable since these instruments are not a primary success path for mitigation of an accident; therefore it is unnecessary to have these instrument SRs in the TS. These instruments will continue to be under regulatory controls through 10CFR50.59. Since these instruments have been removed from TS controls, this is a less restrictive change.
LR	116	Table 4.1-1C, Function18. The instrumentation shift check and monthly functional test have been relocated to the TRM. This change is consistent with the guidance of NUREG- 1431. This change is acceptable since this instrumentation usually passes these SRs when performed. Even though this instrumentation is removed from the TS, it will continue to be under the regulatory controls of 10CFR50.59 since the TRM is part of the USAR. Since these SRs are relocated from the TS, this is a less restrictive change.
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NSHD category	Change number 3.3-	Discussion Of Change	ч.
L	117	Table 4.1-1C, Function 18, Calibration and has not been included in the applicability for SR is included as a note in SR 3.3.1.12 in OT Δ T and OP Δ T functions. Since OT Δ T a applicable in Modes 1 and 2, this SR has b applicable in Modes 1 and 2. This change the guidance of NUREG-1431. This change since the SR is required to be met in the m and OP Δ T perform a safety function. Since applicable in fewer modes, this is a less re	or this SR. This support of the nd OP Δ T are only been made is consistent with ge is acceptable odes where OT Δ T e the SR is
LR	118	Table 4.1-1C, Function 29. The CTS Surverse Requirements for the hydrogen monitors, we restrictive than NUREG-1431, have been in TRM which is by reference part of the USA monitors will continue to be included in the Instrumentation specification and the NUR apply. This change is acceptable since the monitors will continue to be required by ITS required testing. The current Surveillance be under the regulatory controls of 10CFR current Surveillance Requirements have be TS controls, this is a less restrictive change.	which are more elocated to the R. The hydrogen Event Monitoring EG-1431 SRs will hydrogen S and will have TS Requirements will 50.59. Since the een removed from
	119	Not used.	
	120	Not used.	
Prairie Islan Units 1 and		48	12/11/00

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Part D

category	Change number 3.3-	Discussion Of Chang	le
A	121	Table 4.1-1C, Function 21. A new SR 3 included along with a new explanatory in TADOT to be performed on the containing path isolation valve position indication in of instrumentation calibration. Since this current plant practice, this change is a co- understanding of CTS requirements and administrative change. This change is of NUREG-1431 as modified by TSTF-244	note to require a ment penetration flow Instrumentation in lieu Is is consistent with Isonation of the Interefore this is an Interefore this is an
	122	Not used.	
А	123	Table 4.1-1C, Notes 35, 36 and 37. The included in the ITS since the functions to have been relocated or the note has been due to the format of the ITS. Since no a	o which they relate
		due to the format of the ITS. Since no s have been made in technical requireme operations, this is an administrative cha	substantive changes nts or plant
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NSHD category	Change number 3.3-	Discussion Of Change
L	125	CTS 3.10.C.4. CTS requires verification of the core quadrant power balance daily and after 10% power changes when one excore nuclear channel is inoperable and the power is above 85%. This change will require the core quadrant power balance to be verified every 12 hours under these conditions. This change is more restrictive since the 12 hour Frequency is twice daily. For power changes of 10% or more which occur in less than 12 hours this is a less restrictive change. Therefore this change is considered a less restrictive change. This change is acceptable since: 1) most power changes occur slowly such that the 12 hour Frequency is not a significant extension of the time for verification of the core power quadrant balance; 2) the QPTR changes occur relatively slowly when there are power changes; 3) large quadrant power tilts are likely to be detected with the remaining operable excore nuclear channels; 4) sudden significant quadrant power tilts are typically associated with other indications of abnormality (for example, a dropped rod) that prompt verification of core power tilt; and 5) the probability of an accident is very low during the time between a controlled 10% power change and the 12 hour SR performance Frequency. This change is consistent with the guidance of NUREG-1431.
A	126	CTS 3.10.C.4. CTS references CTS Specification 3.11. This change references ITS SR 3.2.4.2. Since there is not a substantive technical change, this is an administrative

su change.

Prairie Island Units 1 and 2

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