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B 2.0 SAFETY LIMITS (SLs)

B 2.1.1 Reactor Core SLs

BASES

BACKGROUND

GDC 10 (Ref. 1) requires that specified acceptable fuel design limits are not exceeded during steady state operation, normal operational transients, and anticipated operational occurrences (AOOs). This is accomplished by having a departure from nucleate boiling (DNB) design basis, which corresponds to a 95% probability at a 95% confidence level (the 95/95 DNB criterion) that DNB will not occur and by requiring that fuel centerline temperature stays below the melting temperature.

The restrictions of this SL prevent overheating of the fuel and cladding, as well as possible cladding perforation, that would result in the release of fission products to the reactor coolant. Overheating of the fuel is prevented by maintaining the steady state peak linear heat rate (LHR) below the level at which fuel centerline melting occurs. Overheating of the fuel cladding is prevented by restricting fuel operation to within the nucleate boiling regime, where the heat transfer coefficient is large and the cladding surface temperature is slightly above the coolant saturation temperature.

Fuel centerline melting occurs when the local LHR, or power peaking, in a region of the fuel is high enough to cause the fuel centerline temperature to reach the melting point of the fuel. Expansion of the pellet upon centerline melting may cause the pellet to stress the cladding to the point of failure, allowing an uncontrolled release of activity to the reactor coolant.

Operation above the boundary of the nucleate boiling regime could result in excessive cladding temperature because of the onset of DNB and the resultant sharp reduction in heat transfer coefficient. Inside the steam film, high cladding temperatures are reached, and a cladding water (zirconium water) reaction may take place. This chemical reaction results in oxidation of the fuel cladding to a structurally weaker form. This weaker form may lose its integrity, resulting in an uncontrolled release of activity to the reactor coolant.

(continued)

BASES

BACKGROUND (continued)

The proper functioning of the Reactor Protection System (RPS) and steam generator safety valves prevents violation of the reactor core SLs.

APPLICABLE SAFETY ANALYSES

The fuel cladding must not sustain damage as a result of normal operation and AOOs. The reactor core SLs are established to preclude violation of the following fuel design criteria:

a. There must be at least 95% probability at a 95% confidence level (the 95/95 DNB criterion) that the hot fuel rod in the core does not experience DNB; and

b. The hot fuel pellet in the core must not experience centerline fuel melting.

The Reactor Protection System (Ref. 2), in combination with all the LCOs, are designed to prevent any anticipated combination of transient conditions for Reactor Coolant System (RCS) temperature, pressure, and THERMAL POWER level that would result in a departure from nucleate boiling ratio (DNBR) of less than the DNBR limit and preclude the existence of flow instabilities.

Automatic enforcement of these reactor core SLs is provided by the following functions:

a. High pressurizer pressure trip;

b. Low pressurizer pressure trip;

c. Overtemperature ΔT trip;

d. Overpower ΔT trip;

e. Power Range Neutron Flux trip; and

f. Steam generator safety valves.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

The limitation that the average enthalpy in the hot leg be less than or equal to the enthalpy of saturated liquid also ensures that the ΔT measured by instrumentation, used in the RPS design as a measure of core power, is proportional to core power.

The SLs represent a design requirement for establishing the RPS trip setpoints identified previously. LCO 3.4.1, "RCS Pressure, Temperature, and Flow Departure from Nucleate Boiling (DNB) Limits," or the assumed initial conditions of the safety analyses (as indicated in the FSAR, Ref. 2) provide more restrictive limits to ensure that the SLs are not exceeded.

SAFETY LIMITS

The curves provided in Figure 2.1-1 show the loci of points of thermal power, Reactor Coolant System pressure and vessel inlet temperature for which the calculated DNBR is no less than the Safety Limit DNBR value or the average enthalpy at the vessel exit is less than the enthalpy of saturated liquid.

The calculation of these limits assumes:

1. $F_{\Delta H}^{RTP} = F_{\Delta H}^{N}$ limit at RTP specified in the COLR;

2. An equivalent steam generator tube plugging level of up to 30% in any steam generator provided the equivalent average plugging level in all steam generators is less than or equal to 24% (Ref. 3);

3. Reactor coolant system total flow rate of greater than or equal to 375,600 gpm as measured at the plant; and,

4. A reference cosine with a peak of 1.55 for axial power shape.

Figure 2.1-1 includes an allowance for an increase in the enthalpy rise hot channel factor at reduced power based on the expression:

(continued)

BASES

SAFETY LIMITS (continued)

$$F_{\Delta H}^{N} \leq F_{\Delta H}^{RTP}(1 + PF_{\Delta H}(1-P))$$

Where
P is the fraction of Rated Thermal Power;
$F_{\Delta H}^{RTP}$ is the $F_{\Delta H}^{N}$ limit at RTP specified in the COLR; and,
$PF_{\Delta H}$ is the Power Factor Multiplier specified in the COLR.

When flow or $F_{\Delta H}$ is measured, no additional allowances are necessary prior to comparison with the limits presented. A 2.9% measurement uncertainty on Flow and a 4% measurement uncertainty of $F_{\Delta H}$ have already been included in the above limits.

These limiting heat flux conditions are higher than those calculated for the range of all control rods fully withdrawn to the maximum allowable control rod insertion limit (specified in the COLR) assuming the axial power imbalance is within the limits of the f(ΔI) function of the Overtemperature ΔT trip. When the axial power imbalance is not within the tolerance, the axial power imbalance effect on the Overtemperature ΔT trips will reduce the setpoints to provide protection consistent with core safety limits.

APPLICABILITY

SL 2.1.1 only applies in MODES 1 and 2 because these are the only MODES in which the reactor is critical. Automatic protection functions are required to be OPERABLE during MODES 1 and 2 to ensure operation within the reactor core SLs. The steam generator safety valves or automatic protection actions serve to prevent RCS heatup to the reactor core SL conditions or to initiate a reactor trip function, which forces the unit into MODE 3. Setpoints for the reactor trip functions are specified in LCO 3.3.1, "Reactor Protection System (RPS) Instrumentation." In MODES 3, 4, 5, and 6, Applicability is not required since the reactor is not generating significant THERMAL POWER.

(continued)

BASES (continued)

SAFETY LIMIT VIOLATIONS

If SL 2.1.1 is violated, the requirement to go to MODE 3 places the unit in a MODE in which this SL is not applicable. The allowed Completion Time of 1 hour recognizes the importance of bringing the unit to a MODE of operation where this SL is not applicable, and reduces the probability of fuel damage.

REFERENCES

1. 10 CFR 50, Appendix A.

2. FSAR, Section 7.2.

3. WCAP-10705, Safety Evaluation for Indian Point Unit 3 with Asymmetric Tube Plugging Among Steam Generators, October 1984.

B 2.0 SAFETY LIMITS (SLs)

B 2.1.2 Reactor Coolant System (RCS) Pressure SL

BASES

BACKGROUND

The SL on RCS pressure protects the integrity of the RCS against overpressurization. In the event of fuel cladding failure, fission products are released into the reactor coolant. The RCS then serves as the primary barrier in preventing the release of fission products into the atmosphere. By establishing an upper limit on RCS pressure, the continued integrity of the RCS is ensured. According to 10 CFR 50, Appendix A, GDC 14, "Reactor Coolant Pressure Boundary," and GDC 15, "Reactor Coolant System Design" (Ref. 1), the reactor coolant pressure boundary (RCPB) design conditions are not to be exceeded during normal operation and anticipated operational occurrences (AOOs). Also, in accordance with GDC 28, "Reactivity Limits" (Ref. 1), reactivity accidents, including rod ejection, do not result in damage to the RCPB greater than limited local yielding.

The design pressure of the RCS is 2485 psig. During normal operation and AOOs, RCS pressure is limited from exceeding the design pressure by more than 10%, in accordance with Section III of the ASME Code (Ref. 2). To ensure system integrity, all RCS components are hydrostatically tested at 125% of design pressure, according to the ASME Code requirements prior to initial operation when there is no fuel in the core. Following inception of unit operation, RCS components shall be pressure tested, in accordance with the requirements of ASME Code, Section XI (Ref. 3).

Overpressurization of the RCS could result in a breach of the RCPB. If such a breach occurs in conjunction with a fuel cladding failure, fission products could enter the containment atmosphere, raising concerns relative to limits on radioactive releases specified in 10 CFR 100, "Reactor Site Criteria" (Ref. 4).

(continued)

BASES (continued)

APPLICABLE SAFETY ANALYSES

The RCS pressurizer safety valves, the main steam safety valves (MSSVs), and the reactor high pressure trip have settings established to ensure that the RCS pressure SL will not be exceeded.

The RCS pressurizer safety valves are sized to prevent system pressure from exceeding the design pressure by more than 10%, as specified in Section III of the ASME Code for Nuclear Power Plant Components (Ref. 2). The transient that establishes the required relief capacity, and hence valve size requirements and lift settings, is a complete loss of external load without a direct reactor trip. During the transient, no control actions are assumed, except that the safety valves on the secondary plant are assumed to open when the steam pressure reaches the secondary plant safety valve settings, and nominal feedwater supply is maintained.

The Reactor Protection System setpoints (Ref. 5), together with the settings of the MSSVs, provide pressure protection for normal operation and AOOs. The reactor high pressure trip setpoint is specifically set to provide protection against overpressurization (Ref. 5). The safety analyses for both the high pressure trip and the RCS pressurizer safety valves are performed using conservative assumptions relative to pressure control devices.

More specifically, no credit is taken for operation of the following:

a. Pressurizer Power Operated Relief Valves (PORVs);

b. Atmospheric Dump Valves;

c. Steam Dump System;

d. Reactor Control System;

e. Pressurizer Level Control System; or

f. Pressurizer Spray.

(continued)

BASES (continued)

SAFETY LIMITS

The maximum transient pressure allowed in the RCS pressure vessel under the ASME Code, Section III, is 110% of design pressure. The maximum transient pressure allowed in the RCS piping, valves, and fittings under USAS, Section B31.1 (Ref. 6) is 120% of design pressure. The most limiting of these two allowances is the 110% of design pressure; therefore, the SL on maximum allowable RCS pressure is 2735 psig.

APPLICABILITY

SL 2.1.2 applies in MODES 1, 2, 3, 4, and 5 and in MODE 6 when the reactor vessel head is on because this SL could be approached or exceeded in these MODES due to overpressurization events. The SL is not applicable in MODE 6 when reactor vessel head is removed because the RCS can not be pressurized.

SAFETY LIMIT VIOLATIONS

If the RCS pressure SL is violated when the reactor is in MODE 1 or 2, the requirement is to restore compliance and be in MODE 3 within 1 hour.

Exceeding the RCS pressure SL may cause immediate RCS failure and create a potential for radioactive releases in excess of 10 CFR 100, "Reactor Site Criteria," limits (Ref. 4).

The allowable Completion Time of 1 hour recognizes the importance of reducing power level to a MODE of operation where the potential for challenges to safety systems is minimized.

If the RCS pressure SL is exceeded in MODE 3, 4, or 5, RCS pressure must be restored to within the SL value within 5 minutes. Exceeding the RCS pressure SL in MODE 3, 4, or 5 is more severe than exceeding this SL in MODE 1 or 2, since the reactor vessel temperature may be lower and the vessel material, consequently, less ductile. As such, pressure must be reduced to less than the SL within 5 minutes. The action does not require reducing MODES, since this would require reducing temperature, which would compound the problem by adding thermal gradient stresses to the existing pressure stress.

(continued)

BASES (continued)

REFERENCES

1. 10 CFR 50, Appendix A.

2. ASME, Boiler and Pressure Vessel Code, Section III, Article NB-7000.50433

3. ASME, Boiler and Pressure Vessel Code, Section XI, Article IWX-5000.

4. 10 CFR 100.

5. FSAR, Section 7.2.

6. USAS B31.1, Standard Code for Pressure Piping, American Society of Mechanical Engineers, 1967.

B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

BASES

LCOs

LCO 3.0.1 through LCO 3.0.6 establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated.

LCO 3.0.1

LCO 3.0.1 establishes the Applicability statement within each individual Specification as the requirement for when the LCO is required to be met (i.e., when the unit is in the MODES or other specified conditions of the Applicability statement of each Specification).

LCO 3.0.2

LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, the associated ACTIONS shall be met. The Completion Time of each Required Action for an ACTIONS Condition is applicable from the point in time that an ACTIONS Condition is entered. The Required Actions establish those remedial measures that must be taken within specified Completion Times when the requirements of an LCO are not met. This Specification establishes that:

a. Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification; and

b. Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified.

There are two basic types of Required Actions. The first type of Required Action specifies a time limit in which the LCO must be met. This time limit is the Completion Time to restore an inoperable system or component to OPERABLE status or to restore variables to within specified limits. If this type of Required Action is not completed within the specified Completion Time, a shutdown may be required to place the unit in a MODE or condition in which the Specification is not applicable. (Whether stated as a Required Action or not, correction of the entered Condition is an action that may always be considered upon entering ACTIONS.)

(continued)

BASES

LCO 3.0.2 (continued)

The second type of Required Action specifies the remedial measures that permit continued operation of the unit that is not further restricted by the Completion Time. In this case, compliance with the Required Actions provides an acceptable level of safety for continued operation.

Completing the Required Actions is not required when an LCO is met or is no longer applicable, unless otherwise stated in the individual Specifications.

The nature of some Required Actions of some Conditions necessitates that, once the Condition is entered, the Required Actions must be completed even though the associated Conditions no longer exist. The individual LCO's ACTIONS specify the Required Actions where this is the case. An example of this is in LCO 3.4.3, "RCS Pressure and Temperature (P/T) Limits."

The Completion Times of the Required Actions are also applicable when a system or component is removed from service intentionally. The reasons for intentionally relying on the ACTIONS include, but are not limited to, performance of Surveillances, preventive maintenance, corrective maintenance, or investigation of operational problems. Entering ACTIONS for these reasons must be done in a manner that does not compromise safety. Intentional entry into ACTIONS should not be made for operational convenience. Additionally, if intentional entry into ACTIONS would result in redundant equipment being inoperable, alternatives should be used instead. Doing so limits the time both subsystems/trains of a safety function are inoperable and limits the time conditions exist which may result in LCO 3.0.3 being entered. Individual Specifications may specify a time limit for performing an SR when equipment is removed from service or bypassed for testing. In this case, the Completion Times of the Required Actions are applicable when this time limit expires, if the equipment remains removed from service or bypassed.

When a change in MODE or other specified condition is required to comply with Required Actions, the unit may enter a MODE or other specified condition in which another Specification becomes applicable.

(continued)

BASES

LCO 3.0.2 (continued)

In this case, the Completion Times of the associated Required Actions would apply from the point in time that the new Specification becomes applicable, and the ACTIONS Condition(s) are entered.

LCO 3.0.3

LCO 3.0.3 establishes the actions that must be implemented when an LCO is not met and:

a. An associated Required Action and Completion Time is not met and no other Condition applies; or

b. The condition of the unit is not specifically addressed by the associated ACTIONS. This means that no combination of Conditions stated in the ACTIONS can be made that exactly corresponds to the actual condition of the unit. Sometimes, possible combinations of Conditions are such that entering LCO 3.0.3 is warranted; in such cases, the ACTIONS specifically state a Condition corresponding to such combinations and also that LCO 3.0.3 be entered immediately.

This Specification delineates the time limits for placing the unit in a safe MODE or other specified condition when operation cannot be maintained within the limits for safe operation as defined by the LCO and its ACTIONS. It is not intended to be used as an operational convenience that permits routine voluntary removal of redundant systems or components from service in lieu of other alternatives that would not result in redundant systems or components being inoperable.

Upon entering LCO 3.0.3, 1 hour is allowed to prepare for an orderly shutdown before initiating a change in unit operation. This includes time to permit the operator to coordinate the reduction in electrical generation with the load dispatcher to ensure the stability and availability of the electrical grid. The time limits specified to reach lower MODES of operation permit the shutdown to proceed in a controlled and orderly manner that is well within the specified maximum cooldown rate and within the capabilities of the unit, assuming that only the minimum required equipment is OPERABLE.

(continued)

BASES

LCO 3.0.3 (continued)

This reduces thermal stresses on components of the Reactor Coolant System and the potential for a plant upset that could challenge safety systems under conditions to which this Specification applies. The use and interpretation of specified times to complete the actions of LCO 3.0.3 are consistent with the discussion of Section 1.3, Completion Times.

A unit shutdown required in accordance with LCO 3.0.3 may be terminated and LCO 3.0.3 exited if any of the following occurs:

a. The LCO is now met.

b. A Condition exists for which the Required Actions have now been performed.

c. ACTIONS exist that do not have expired Completion Times. These Completion Times are applicable from the point in time that the Condition is initially entered and not from the time LCO 3.0.3 is exited.

The time limits of Specification 3.0.3 allow 37 hours for the unit to be in MODE 5 when a shutdown is required during MODE 1 operation. If the unit is in a lower MODE of operation when a shutdown is required, the time limit for reaching the next lower MODE applies. If a lower MODE is reached in less time than allowed, however, the total allowable time to reach MODE 5, or other applicable MODE, is not reduced. For example, if MODE 3 is reached in 2 hours, then the time allowed for reaching MODE 4 is the next 11 hours, because the total time for reaching MODE 4 is not reduced from the allowable limit of 13 hours. Therefore, if remedial measures are completed that would permit a return to MODE 1, a penalty is not incurred by having to reach a lower MODE of operation in less than the total time allowed.

In MODES 1, 2, 3, and 4, LCO 3.0.3 provides actions for Conditions not covered in other Specifications. The requirements of LCO 3.0.3 do not apply in MODES 5 and 6 because the unit is already in the most restrictive Condition required by LCO 3.0.3. The requirements of LCO 3.0.3 do not apply in other specified conditions of the Applicability (unless in MODE 1, 2, 3, or 4) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.

(continued)

BASES

LCO 3.0.3 (continued)

Exceptions to LCO 3.0.3 are provided in instances where requiring a unit shutdown, in accordance with LCO 3.0.3, would not provide appropriate remedial measures for the associated condition of the unit. An example of this is in LCO 3.7.14, " Spent Fuel Pit Water Level." LCO 3.7.14 has an Applicability of "During movement of irradiated fuel assemblies in the Spent Fuel Pit." Therefore, this LCO can be applicable in any or all MODES. If the LCO and the Required Actions of LCO 3.7.14 are not met while in MODE 1, 2, or 3, there is no safety benefit to be gained by placing the unit in a shutdown condition. The Required Action of LCO 3.7.14 of "Suspend movement of irradiated fuel assemblies in the Spent Fuel Pit" is the appropriate Required Action to complete in lieu of the actions of LCO 3.0.3. These exceptions are addressed in the individual Specifications.

LCO 3.0.4

LCO 3.0.4 establishes limitations on changes in MODES or other specified conditions in the Applicability when an LCO is not met. It precludes placing the unit in a MODE or other specified condition stated in that Applicability (e.g., Applicability desired to be entered) when the following exist:

a. Unit conditions are such that the requirements of the LCO would not be met in the Applicability desired to be entered; and

b. Continued noncompliance with the LCO requirements, if the Applicability were entered, would result in the unit being required to exit the Applicability desired to be entered to comply with the Required Actions.

Compliance with Required Actions that permit continued operation of the unit for an unlimited period of time in a MODE or other specified condition provides an acceptable level of safety for continued operation. This is without regard to the status of the unit before or after the MODE change. Therefore, in such cases, entry into a MODE or other specified condition in the Applicability may be made in accordance with the provisions of the Required Actions. The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE

(continued)

BASES

LCO 3.0.4 (continued)

status before entering an associated MODE or other specified condition in the Applicability.

The provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown.

Exceptions to LCO 3.0.4 are stated in the individual Specifications. The exceptions allow entry in MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered do not provide for continued operation for a continuous period of time. Exceptions may apply to all the ACTIONS or to a specific Required Action of a Specification.

LCO 3.0.4 is only applicable when entering MODE 4 from MODE 5, MODE 3 from MODE 4, MODE 2 from MODE 3, or MODE 1 from MODE 2. Furthermore, LCO 3.0.4 is applicable when entering any other specified condition in the Applicability only while operating in MODES 1, 2, 3, or 4. The requirements of LCO 3.0.4 do not apply in MODES 5 and 6, or in other specified conditions of the Applicability (unless in MODES 1, 2, 3, or 4) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.

Surveillances do not have to be performed on the associated inoperable equipment (or on variables outside the specified limits), as permitted by SR 3.0.1. Therefore, changing MODES or other specified conditions while in an ACTIONS Condition, in compliance with LCO 3.0.4 or where an exception to LCO 3.0.4 is stated, is not a violation of SR 3.0.1 or SR 3.0.4 for those Surveillances that do not have to be performed due to the associated inoperable equipment. However, SRs must be met to ensure OPERABILITY prior to declaring the associated equipment OPERABLE (or variable within limits) and restoring compliance with the affected LCO.

(continued)

BASES (continued)

LCO 3.0.5

LCO 3.0.5 establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS. The sole purpose of this Specification is to provide an exception to LCO 3.0.2 (e.g., to not comply with the applicable Required Action(s)) to allow the performance of required testing to demonstrate:

a. The OPERABILITY of the equipment being returned to service; or

b. The OPERABILITY of other equipment.

The administrative controls ensure the time the equipment is returned to service in conflict with the requirements of the ACTIONS is limited to the time absolutely necessary to perform the required testing to demonstrate OPERABILITY. This Specification does not provide time to perform any other preventive or corrective maintenance.

An example of demonstrating the OPERABILITY of the equipment being returned to service is reopening a containment isolation valve that has been closed to comply with Required Actions and must be reopened to perform the SRs.

An example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of required testing on another channel in the other trip system. A similar example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to permit the logic to function and indicate the appropriate response during the performance of required testing on another channel in the same trip system.

LCO 3.0.6

LCO 3.0.6 establishes an exception to LCO 3.0.2 for support systems that have an LCO specified in the Technical Specifications (TS). This exception is provided because LCO 3.0.2 would require that the Conditions and Required Actions of the associated inoperable supported system LCO be entered solely due to the inoperability of the support system. This

(continued)

BASES

LCO 3.0.6 (continued)

exception is justified because the actions that are required to ensure the unit is maintained in a safe condition are specified in the support system LCO's Required Actions. These Required Actions may include entering the supported system's Conditions and Required Actions or may specify other Required Actions.

When a support system is inoperable and there is an LCO specified for it in the TS, the supported system(s) are required to be declared inoperable if determined to be inoperable as a result of the support system inoperability. However, it is not necessary to enter into the supported systems' Conditions and Required Actions unless directed to do so by the support system's Required Actions. The potential confusion and inconsistency of requirements related to the entry into multiple support and supported systems' LCOs' Conditions and Required Actions are eliminated by providing all the actions that are necessary to ensure the unit is maintained in a safe condition in the support system's Required Actions.

However, there are instances where a support system's Required Action may either direct a supported system to be declared inoperable or direct entry into Conditions and Required Actions for the supported system. This may occur immediately or after some specified delay to perform some other Required Action. Regardless of whether it is immediate or after some delay, when a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

Specification 5.5.14, "Safety Function Determination Program (SFDP)," ensures loss of safety function is detected and appropriate actions are taken. Upon entry into LCO 3.0.6, an evaluation shall be made to determine if loss of safety function exists. Additionally, other limitations, remedial actions, or compensatory actions may be identified as a result of the support system inoperability and corresponding exception to entering supported system Conditions and Required Actions. The SFDP implements the requirements of LCO 3.0.6.

(continued)

BASES

LCO 3.0.6 (continued)

Cross train checks to identify a loss of safety function for those support systems that support multiple and redundant safety systems are required. The cross train check verifies that the supported systems of the redundant OPERABLE support system are OPERABLE, thereby ensuring safety function is retained. If this evaluation determines that a loss of safety function exists, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

LCO 3.0.7

There are certain special tests and operations required to be performed at various times over the life of the unit. These special tests and operations are necessary to demonstrate select unit performance characteristics, to perform special maintenance activities, and to perform special evolutions. Test Exception LCOs, such as LCO 3.1.8, allow specified Technical Specification (TS) requirements to be changed to permit performances of these special tests and operations, which otherwise could not be performed if required to comply with the requirements of these TS. Unless otherwise specified, all the other TS requirements remain unchanged. This will ensure all appropriate requirements of the MODE or other specified condition not directly associated with or required to be changed to perform the special test or operation will remain in effect.

The Applicability of a Test Exception LCO represents a condition not necessarily in compliance with the normal requirements of the TS. Compliance with Test Exception LCOs is optional. A special operation may be performed either under the provisions of the appropriate Test Exception LCO or under the other applicable TS requirements. If it is desired to perform the special operation under the provisions of the Test Exception LCO, the requirements of the Test Exception LCO shall be followed.

B 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

BASES

SRs

SR 3.0.1 through SR 3.0.4 establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated.

SR 3.0.1

SR 3.0.1 establishes the requirement that SRs must be met during the MODES or other specified conditions in the Applicability for which the requirements of the LCO apply, unless otherwise specified in the individual SRs. This Specification is to ensure that Surveillances are performed to verify the OPERABILITY of systems and components, and that variables are within specified limits. Failure to meet a Surveillance within the specified Frequency, in accordance with SR 3.0.2, constitutes a failure to meet an LCO.

Systems and components are assumed to be OPERABLE when the associated SRs have been met. Nothing in this Specification, however, is to be construed as implying that systems or components are OPERABLE when:

a. The systems or components are known to be inoperable, although still meeting the SRs; or

b. The requirements of the Surveillance(s) are known not to be met between required Surveillance performances.

Surveillances do not have to be performed when the unit is in a MODE or other specified condition for which the requirements of the associated LCO are not applicable, unless otherwise specified. The SRs associated with a test exception are only applicable when the test exception is used as an allowable exception to the requirements of a Specification.

Unplanned events may satisfy the requirements (including applicable acceptance criteria) for a given SR. In this case, the unplanned event may be credited as fulfilling the performance of the SR.

(continued)

BASES

SR 3.0.1 (continued)

This allowance includes those SRs whose performance is normally precluded in a given MODE or other specified condition.

Surveillances, including Surveillances invoked by Required Actions, do not have to be performed on inoperable equipment because the ACTIONS define the remedial measures that apply. Surveillances have to be met and performed in accordance with SR 3.0.2, prior to returning equipment to OPERABLE status.

Upon completion of maintenance, appropriate post maintenance testing is required to declare equipment OPERABLE. This includes ensuring applicable Surveillances are not failed and their most recent performance is in accordance with SR 3.0.2. Post maintenance testing may not be possible in the current MODE or other specified conditions in the Applicability due to the necessary unit parameters not having been established. In these situations, the equipment may be considered OPERABLE provided testing has been satisfactorily completed to the extent possible and the equipment is not otherwise believed to be incapable of performing its function. This will allow operation to proceed to a MODE or other specified condition where other necessary post maintenance tests can be completed.

SR 3.0.2

SR 3.0.2 establishes the requirements for meeting the specified Frequency for Surveillances and any Required Action with a Completion Time that requires the periodic performance of the Required Action on a "once per . . ." interval.

SR 3.0.2 permits a 25% extension of the interval specified in the Frequency. This extension facilitates Surveillance scheduling and considers plant operating conditions that may not be suitable for conducting the Surveillance (e.g., transient conditions or other ongoing Surveillance or maintenance activities).

The 25% extension does not significantly degrade the reliability that results from performing the Surveillance at its specified Frequency. This is based on the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the SRs.

(continued)

BASES

SR 3.0.2 (continued)

The exceptions to SR 3.0.2 are those Surveillances for which the 25% extension of the interval specified in the Frequency does not apply. These exceptions are stated in the individual Specifications. An example of where SR 3.0.2 does not apply is a Surveillance with a Frequency of "in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions." The requirements of regulations take precedence over the TS. The TS cannot in and of themselves extend a test interval specified in the regulations. Therefore, there is a Note in the Frequency stating, "SR 3.0.2 is not applicable."

As stated in SR 3.0.2, the 25% extension also does not apply to the initial portion of a periodic Completion Time that requires performance on a "once per ..." basis. The 25% extension applies to each performance after the initial performance. The initial performance of the Required Action, whether it is a particular Surveillance or some other remedial action, is considered a single action with a single Completion Time. One reason for not allowing the 25% extension to this Completion Time is that such an action usually verifies that no loss of function has occurred by checking the status of redundant or diverse components or accomplishes the function of the inoperable equipment in an alternative manner.

The provisions of SR 3.0.2 are not intended to be used repeatedly merely as an operational convenience to extend Surveillance intervals (other than those consistent with refueling intervals) or periodic Completion Time intervals beyond those specified.

SR 3.0.3

SR 3.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified Frequency, whichever is less, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

This delay period provides adequate time to complete Surveillances that have been missed.

(continued)

BASES

SR 3.0.3 (continued)

This delay period permits the completion of a Surveillance before complying with Required Actions or other remedial measures that might preclude completion of the Surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements. When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions or operational situations, is discovered not to have been performed when specified, SR 3.0.3 allows the full delay period of 24 hours to perform the Surveillance.

SR 3.0.3 also provides a time limit for completion of Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.

Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals.

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon the failure of the Surveillance.

Completion of the Surveillance within the delay period allowed by this Specification, or within the Completion Time of the ACTIONS, restores compliance with SR 3.0.1.

(continued)

BASES (continued)

SR 3.0.4

SR 3.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified condition in the Applicability.

This Specification ensures that system and component OPERABILITY requirements and variable limits are met before entry into MODES or other specified conditions in the Applicability for which these systems and components ensure safe operation of the unit.

The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or component to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

However, in certain circumstances, failing to meet an SR will not result in SR 3.0.4 restricting a MODE change or other specified condition change. When a system, subsystem, division, component, device, or variable is inoperable or outside its specified limits, the associated SR(s) are not required to be performed, per SR 3.0.1, which states that surveillances do not have to be performed on inoperable equipment. When equipment is inoperable, SR 3.0.4 does not apply to the associated SR(s) since the requirement for the SR(s) to be performed is removed. Therefore, failing to perform the Surveillance(s) within the specified Frequency does not result in an SR 3.0.4 restriction to changing MODES or other specified conditions of the Applicability. However, since the LCO is not met in this instance, LCO 3.0.4 will govern any restrictions that may (or may not) apply to MODE or other specified condition changes.

The provisions of SR 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown.

The precise requirements for performance of SRs are specified such that exceptions to SR 3.0.4 are not necessary. The specific time frames and conditions necessary for meeting the SRs are specified in the Frequency, in the Surveillance, or both.

(continued)

BASES

SR 3.0.4 (continued)

This allows performance of Surveillances when the prerequisite condition(s) specified in a Surveillance procedure require entry into the MODE or other specified condition in the Applicability of the associated LCO prior to the performance or completion of a Surveillance. A Surveillance that could not be performed until after entering the LCO Applicability, would have its Frequency specified such that it is not "due" until the specific conditions needed are met. Alternately, the Surveillance may be stated in the form of a Note as not required (to be met or performed) until a particular event, condition, or time has been reached. Further discussion of the specific formats of SRs' annotation is found in Section 1.4, Frequency.

SR 3.0.4 is only applicable when entering MODE 4 from MODE 5, MODE 3 from MODE 4, Mode 2 from MODE 3, or MODE 1 from MODE 2. Furthermore, SR 3.0.4 is applicable when entering any other specified condition in the Applicability only while operating in MODES 1, 2, 3, or 4. The requirements of SR 3.0.4 do not apply in MODES 5 and 6, or in other specified conditions of the Applicability (unless in MODES 1, 2, 3, or 4) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.

B 3.1 REACTIVITY CONTROL SYSTEMS

B 3.1.1 SHUTDOWN MARGIN (SDM)

BASES

BACKGROUND

According to GDC 26 (Ref. 1), the reactivity control systems must be redundant and capable of holding the reactor core subcritical when shut down under cold conditions. Maintenance of the SDM ensures that postulated reactivity events will not damage the fuel.

SDM requirements provide sufficient reactivity margin to ensure that acceptable fuel design limits will not be exceeded for normal shutdown and anticipated operational occurrences (AOOs). As such, the SDM defines the degree of subcriticality that would be obtained immediately following the insertion or scram of all shutdown and control rods, assuming that the single rod cluster assembly of highest reactivity worth is fully withdrawn.

The system design requires that two independent reactivity control systems be provided, and that one of these systems be capable of maintaining the core subcritical under cold conditions. These requirements are provided by the use of movable control assemblies and soluble boric acid in the Reactor Coolant System (RCS). The Control Rod System can compensate for the reactivity effects of the fuel and water temperature changes accompanying power level changes over the range from full load to no load. In addition, the Control Rod System, together with the boration system, provides the SDM during power operation and is capable of making the core subcritical rapidly enough to prevent exceeding acceptable fuel damage limits, assuming that the rod of highest reactivity worth remains fully withdrawn. The soluble boron system can compensate for fuel depletion during operation and all xenon burnout reactivity changes and maintain the reactor subcritical under cold conditions.

During power operation, SDM control is ensured by operating with the shutdown banks within the limits of LCO 3.1.5, "Shutdown Bank Insertion Limits" and the control banks within the limits of LCO 3.1.6, "Control Bank Insertion Limits."

(continued)

BASES

BACKGROUND (continued)

When the unit is in the shutdown and refueling modes, the SDM requirements are met by means of adjustments to the RCS boron concentration.

APPLICABLE SAFETY ANALYSES

The minimum required SDM is assumed as an initial condition in safety analyses. The safety analysis (Ref. 2) establishes an SDM that ensures specified acceptable fuel design limits are not exceeded for normal operation and AOOs, with the assumption of the highest worth rod stuck out on scram. For MODE 5, the primary safety analysis that relies on the SDM limit is the boron dilution analysis.

The acceptance criteria for the SDM requirements are that specified acceptable fuel design limits are maintained. This is done by ensuring that:

a. The reactor can be made subcritical from all operating conditions, transients, and Design Basis Events;

b. The reactivity transients associated with postulated accident conditions are controllable within acceptable limits (departure from nucleate boiling ratio (DNBR), fuel centerline temperature limits for AOOs, and energy deposition of ≤ 225 cal/gm for non-irradiated fuel and ≤ 200 cal/gm for irradiated fuel to satisfy requirements for the rod ejection accident); and

c. The reactor will be maintained sufficiently subcritical to preclude inadvertent criticality in the shutdown condition.

The most limiting accident for the SDM requirements is based on a main steam line break (MSLB), as described in the accident analysis (Ref. 2). The increased steam flow resulting from a pipe break in the main steam system causes an increased energy removal from the affected steam generator (SG), and consequently the RCS. This results in a reduction of the reactor coolant temperature. The resultant coolant shrinkage causes a reduction in pressure.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

In the presence of a negative moderator temperature coefficient, this cooldown causes an increase in core reactivity. As RCS temperature decreases, the severity of an MSLB decreases until the MODE 5 value is reached. The most limiting MSLB, with respect to potential fuel damage before a reactor trip occurs, is a guillotine break of a main steam line inside containment initiated at the end of core life. The positive reactivity addition from the moderator temperature decrease will terminate when the affected SG boils dry, thus terminating RCS heat removal and cooldown. Following the MSLB, a post trip return to power may occur; however, no fuel damage occurs as a result of the post trip return to power, and THERMAL POWER does not violate the Safety Limit (SL) requirement of SL 2.1.1.

In addition to the limiting MSLB transient, the SDM requirement must also protect against:

a. Inadvertent boron dilution;

b. An uncontrolled rod withdrawal from subcritical or low power condition;

c. Startup of an inactive reactor coolant pump (RCP); and

d. Rod ejection.

Each of these events is discussed below.

In the boron dilution analysis, the required SDM defines the reactivity difference between an initial subcritical boron concentration and the corresponding critical boron concentration. These values, in conjunction with the configuration of the RCS and the assumed dilution flow rate, directly affect the results of the analysis. This event is most limiting at the beginning of core life, when critical boron concentrations are highest.

Depending on the system initial conditions and reactivity insertion rate, the uncontrolled rod withdrawal transient is terminated by either a high neutron flux level trip or a

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

overtemperature ΔT trip. In all cases, power level, RCS pressure, linear heat rate, and the DNBR do not exceed allowable limits.

The startup of an inactive RCP will not result in a "cold water" criticality, even if the maximum difference in temperature exists between the SG and the core. The maximum positive reactivity addition that can occur due to an inadvertent RCP start is less than the minimum required SDM. Startup of an idle RCP cannot, therefore, produce a return to power from the hot standby condition.

The ejection of a control rod rapidly adds reactivity to the reactor core, causing both the core power level and heat flux to increase with corresponding increases in reactor coolant temperatures and pressure. The ejection of a rod also produces a time dependent redistribution of core power.

SDM satisfies Criterion 2 of 10 CFR 50.36. Even though it is not directly observed from the control room, SDM is considered an initial condition process variable because it is periodically monitored to ensure that the unit is operating within the bounds of accident analysis assumptions.

LCO

SDM is a core design condition that can be ensured during operation through control rod positioning (control and shutdown banks) and through the soluble boron concentration.

The MSLB (Ref. 2) and the boron dilution (Ref. 2) accidents are the most limiting analyses that establish the SDM value of the LCO. For MSLB accidents, if the LCO is violated, there is a potential to exceed the DNBR limit and to exceed 10 CFR 100, "Reactor Site Criteria," limits (Ref. 3). For the boron dilution accident, if the LCO is violated, the minimum required time assumed for operator action to terminate dilution may no longer be applicable.

(continued

BASES (continued)

APPLICABILITY

In MODE 2 with $k_{eff} < 1.0$ and in MODES 3, 4,and 5, the SDM requirements are applicable to provide sufficient negative reactivity to meet the assumptions of the safety analyses discussed above. In MODE 6, the shutdown reactivity requirements are given in LCO 3.9.1, "Boron Concentration." In MODES 1 and 2, SDM is ensured by complying with LCO 3.1.5, "Shutdown Bank Insertion Limits," and LCO 3.1.6, Control Bank Insertion Limits.

ACTIONS

A.1

If the SDM requirements are not met, boration must be initiated promptly. A Completion Time of 15 minutes is adequate for an operator to correctly align and start the required systems and components. It is assumed that boration will be continued until the SDM requirements are met.

In the determination of the required combination of boration flow rate and boron concentration, there is no unique requirement that must be satisfied. Since it is imperative to raise the boron concentration of the RCS as soon as possible, the boron concentration should be a highly concentrated solution, such as that normally found in the boric acid storage tank, or the refueling water storage tank. The operator should borate with the best source available for the plant conditions.

SURVEILLANCE REQUIREMENTS

SR 3.1.1.1

In MODES 1 and 2, SDM is verified by observing that the requirements of LCO 3.1.5 and LCO 3.1.6 are met. In the event that a rod is known to be untrippable, however, SDM verification must account for the worth of the untrippable rod as well as another rod of maximum worth.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

In MODES 3, 4, and 5, the SDM is verified by performing a reactivity balance calculation, considering the listed reactivity effects:

a. RCS boron concentration;

b. Control bank position;

c. RCS average loop temperature;

d. Fuel burnup based on gross thermal energy generation;

e. Xenon concentration;

f. Samarium concentration; and

g. Isothermal temperature coefficient (ITC).

Using the ITC accounts for Doppler reactivity in this calculation because the reactor is subcritical, and the fuel temperature will be changing at the same rate as the RCS.

The Frequency of 24 hours is based on the generally slow change in required boron concentration and the low probability of an accident occurring without the required SDM. This allows time for the operator to collect the required data, which includes performing a boron concentration analysis, and complete the calculation.

REFERENCES

1. 10 CFR 50, Appendix A.

2. FSAR, Chapter 14.

3. 10 CFR 100.

B 3.1 REACTIVITY CONTROL SYSTEMS

B 3.1.2 Core Reactivity

BASES

BACKGROUND

According to GDC 26, GDC 28, and GDC 29 (Ref. 1), reactivity shall be controllable, such that subcriticality is maintained under cold conditions, and acceptable fuel design limits are not exceeded during normal operation and anticipated operational occurrences. Therefore, reactivity balance is used as a measure of the predicted versus measured core reactivity during power operation. The periodic confirmation of core reactivity is necessary to ensure that Design Basis Accident (DBA) and transient safety analyses remain valid. A large reactivity difference could be the result of unanticipated changes in fuel, control rod worth, or operation at conditions not consistent with those assumed in the predictions of core reactivity, and could potentially result in a loss of SDM or violation of acceptable fuel design limits. Comparing predicted versus measured core reactivity validates the nuclear methods used in the safety analysis and supports the SDM demonstrations (LCO 3.1.1, "SHUTDOWN MARGIN (SDM) ") in ensuring the reactor can be brought safely to cold, subcritical conditions.

When the reactor core is critical or in normal power operation, a reactivity balance exists and the net reactivity is zero. A comparison of predicted and measured reactivity is convenient under such a balance, since parameters are being maintained relatively stable under steady state power conditions. The positive reactivity inherent in the core design is balanced by the negative reactivity of the control components, thermal feedback, neutron leakage, and materials in the core that absorb neutrons, such as burnable absorbers producing zero net reactivity. Excess reactivity can be inferred from the boron letdown curve (or critical boron curve), which provides an indication of the soluble boron concentration in the Reactor Coolant System (RCS) versus cycle burnup.

(continued)

BASES

BACKGROUND (continued)

Periodic measurement of the RCS boron concentration for comparison with the predicted value with other variables fixed (such as rod height, temperature, pressure, and power), provides a convenient method of ensuring that core reactivity is within design expectations and that the calculational models used to generate the safety analysis are adequate.

In order to achieve the required fuel cycle energy output, the uranium enrichment, in the new fuel loading and in the fuel remaining from the previous cycle, provides excess positive reactivity beyond that required to sustain steady state operation throughout the cycle. When the reactor is critical at RTP and moderator temperature, the excess positive reactivity is compensated by burnable absorbers (if any), control rods, whatever neutron poisons (mainly xenon and samarium) are present in the fuel, and the RCS boron concentration.

When the core is producing THERMAL POWER, the fuel is being depleted and excess reactivity is decreasing. As the fuel depletes, the RCS boron concentration is reduced to decrease negative reactivity and maintain constant THERMAL POWER. The boron letdown curve is based on steady state operation at RTP. Therefore, deviations from the predicted boron letdown curve may indicate deficiencies in the design analysis, deficiencies in the calculational models, or abnormal core conditions, and must be evaluated.

APPLICABLE SAFETY ANALYSES

The acceptance criteria for core reactivity are that the reactivity balance limit ensures plant operation is maintained within the assumptions of the safety analyses.

Accurate prediction of core reactivity is either an explicit or implicit assumption in the accident analysis evaluations. Accident evaluations (Ref. 2) are, therefore, dependent upon accurate evaluation of core reactivity. In particular, SDM and reactivity transients, such as control rod withdrawal accidents or rod ejection accidents, are very sensitive to accurate prediction of core reactivity.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

These accident analysis evaluations rely on computer codes that have been qualified against available test data, operating plant data, and analytical benchmarks. Monitoring reactivity balance additionally ensures that the nuclear methods provide an accurate representation of the core reactivity.

Design calculations and safety analyses are performed for each fuel cycle for the purpose of predetermining reactivity behavior and the RCS boron concentration requirements for reactivity control during fuel depletion.

The comparison between measured and predicted initial core reactivity provides a normalization for the calculational models used to predict core reactivity. If the measured and predicted RCS boron concentrations for identical core conditions at beginning of life (BOL) do not agree to within specified limits then the assumptions used in the reload cycle design analysis or the calculational models used to predict soluble boron requirements may not be accurate. If reasonable agreement between measured and predicted core reactivity exists at BOL, then the prediction may be normalized to the measured boron concentration. Thereafter, any significant deviations in the measured boron concentration from the predicted boron letdown curve that develop during fuel depletion may be an indication that the calculational model is not adequate for core burnups beyond BOL, or that an unexpected change in core conditions has occurred.

The normalization of predicted RCS boron concentration to the measured value is typically performed after reaching RTP following startup from a refueling outage, with the control rods in their normal positions for power operation. The normalization is performed at BOL conditions, so that core reactivity relative to predicted values can be continually monitored and evaluated as core conditions change during the cycle.

Core reactivity satisfies Criterion 2 of 10 CFR 50.36.

(continued)

BASES (continued)

LCO

This LCO requires that measured core reactivity is within ± 1% Δk/k of predicted values. During steady state power operation, this comparison includes reactor coolant system boron concentration, control rod position, reactor coolant system average loop temperature, fuel burnup based on gross thermal energy generation, xenon concentration, and samarium concentration.

Long term core reactivity behavior is a result of the core physics design and cannot be easily controlled once the core design is fixed. During operation, therefore, the LCO can only be ensured through measurement and tracking, and appropriate actions taken as necessary. Large differences between actual and predicted core reactivity may indicate that the assumptions of the DBA and transient analyses are no longer valid, or that the uncertainties in the Nuclear Design Methodology are larger than expected. A limit on the reactivity balance of ± 1% Δk/k has been established based on engineering judgment. A 1% deviation in reactivity from that predicted is larger than expected for normal operation and should therefore be evaluated.

When measured core reactivity is within 1% Δk/k of the predicted value at steady state thermal conditions, the core is considered to be operating within acceptable design limits. Since deviations from the limit are normally detected by comparing predicted and measured steady state RCS critical boron concentrations, the difference between measured and predicted values would be approximately 100 ppm (depending on the boron worth) before the limit is reached. These values are well within the uncertainty limits for analysis of boron concentration samples, so that spurious violations of the limit due to uncertainty in measuring the RCS boron concentration are unlikely.

APPLICABILITY

The limits on core reactivity must be maintained during MODES 1 and 2 because a reactivity balance must exist when the reactor is critical or producing THERMAL POWER. As the fuel depletes, core conditions are changing, and confirmation of the reactivity balance ensures the core is operating as designed. This Specification does not apply in MODES 3, 4, and 5 because the reactor is shut down and the reactivity balance is not changing.

(continued)

BASES

APPLICABILITY (continued)

In MODE 6, fuel loading results in a continually changing core reactivity. Boron concentration requirements (LCO 3.9.1, "Boron Concentration") ensure that fuel movements are performed within the bounds of the safety analysis. An SDM demonstration is required during the first startup following operations that could have altered core reactivity (e.g., fuel movement, control rod replacement, control rod shuffling).

ACTIONS

A.1 and A.2

Should an anomaly develop between measured and predicted core reactivity, an evaluation of the core design and safety analysis must be performed. Core conditions are evaluated to determine their consistency with input to design calculations. Measured core and process parameters are evaluated to determine that they are within the bounds of the safety analysis, and safety analysis calculational models are reviewed to verify that they are adequate for representation of the core conditions. The required Completion Time of 7 days is based on the low probability of a DBA occurring during this period, and allows sufficient time to assess the physical condition of the reactor and complete the evaluation of the core design and safety analysis.

Following evaluations of the core design and safety analysis, the cause of the reactivity anomaly may be resolved. If the cause of the reactivity anomaly is a mismatch in core conditions at the time of RCS boron concentration sampling, then a recalculation of the RCS boron concentration requirements may be performed to demonstrate that core reactivity is behaving as expected. If an unexpected physical change in the condition of the core has occurred, it must be evaluated and corrected, if possible. If the cause of the reactivity anomaly is in the calculation technique, then the calculational models must be revised to provide more accurate predictions. If any of these results are demonstrated, and it is concluded that the reactor core is acceptable for continued operation, then the boron letdown curve may be renormalized and power operation may continue. If operational restriction or additional SRs are necessary to ensure the reactor core is acceptable for continued operation, then they must be defined.

(continued)

BASES

ACTIONS

A.1 and A.2 (continued)

The required Completion Time of 7 days is adequate for preparing whatever operating restrictions or Surveillances that may be required to allow continued reactor operation.

B.1

If the core reactivity cannot be restored to within the 1% Δk/k limit, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours. If the SDM for MODE 3 is not met, then the boration required by SR 3.1.1.1 would occur. The allowed Completion Time is reasonable, based on operating experience, for reaching MODE 2 from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE REQUIREMENTS

SR 3.1.2.1

Core reactivity is verified by periodic comparisons of measured and predicted RCS boron concentrations. The comparison is made during steady state operation because other core conditions are fixed or stable, including control rod position, moderator temperature, fuel temperature, fuel depletion, xenon concentration, and samarium concentration. The Surveillance is also performed during physics testing following refueling as an initial check on core conditions and design calculations at BOL. The SR is modified by a Note. The Note indicates that the normalization of predicted core reactivity to the measured value, if performed, must take place within the first 60 effective full power days (EFPD) after each fuel loading. This allows sufficient time for core conditions to reach steady state, but prevents operation for a large fraction of the fuel cycle without establishing a benchmark for the design calculations. The required subsequent Frequency of 31 EFPD based on the slow rate of core changes due to fuel depletion and the presence of other indicators (QPTR, AFD, etc.) for prompt indication of an anomaly.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.1.2.1 (continued)

As specified in a Note to the FREQUENCY, the inital performance of the SR in MODE 1 after refueling is not required until 60 EFPDs after entering MODE 1.

REFERENCES

1. 10 CFR 50, Appendix A.

2. FSAR, Chapter 14.

B 3.1 REACTIVITY CONTROL SYSTEMS

B 3.1.3 Moderator Temperature Coefficient (MTC)

BASES

BACKGROUND

According to GDC 11 (Ref. 1), the reactor core and its interaction with the Reactor Coolant System (RCS) must be designed for inherently stable power operation, even in the possible event of an accident. In particular, the net reactivity feedback in the system must compensate for any unintended reactivity increases.

The MTC relates a change in core reactivity to a change in reactor coolant temperature (a positive MTC means that reactivity increases with increasing moderator temperature; conversely, a negative MTC means that reactivity decreases with increasing moderator temperature). The reactor is designed to operate with a negative MTC over the largest possible range of fuel cycle operation. Therefore, a coolant temperature increase will cause a reactivity decrease, so that the coolant temperature tends to return toward its initial value. Reactivity increases that cause a coolant temperature increase will thus be self limiting, and stable power operation will result.

MTC values are predicted at selected burnups during the safety evaluation analysis and are confirmed to be acceptable by measurements. Both initial and reload cores are designed so that the beginning of life (BOL) MTC is less than zero when THERMAL POWER is at RTP. The actual value of the MTC is dependent on core characteristics, such as fuel loading and reactor coolant soluble boron concentration. The core design may require additional fixed distributed poisons to yield an MTC at BOL within the range analyzed in the plant accident analysis. The end of life (EOL) MTC is also limited by the requirements of the accident analysis. Fuel cycles that are designed to achieve high burnups or that have changes to other characteristics are evaluated to ensure that the MTC does not exceed the EOL limit.

The limitations on MTC are provided to ensure that the value of this coefficient remains within the limiting conditions assumed in the FSAR accident and transient analyses.

(continued)

BASES

BACKGROUND (continued)

If the LCO limits are not met, the unit response during transients may not be as predicted. The core could violate criteria that prohibit a return to criticality, or the departure from nucleate boiling ratio criteria of the approved correlation may be violated, which could lead to a loss of the fuel cladding integrity.

The SRs for measurement of the MTC at the beginning and near the end of the fuel cycle are adequate to confirm that the MTC remains within its limits, since this coefficient changes slowly, due principally to the reduction in RCS boron concentration associated with fuel burnup.

APPLICABLE SAFETY ANALYSES

The acceptance criteria for the specified MTC are:

a. The MTC values must remain within the bounds of those used in the accident analysis (Ref. 2); and

b. The MTC must be such that inherently stable power operations result during normal operation and accidents, such as overheating and overcooling events.

The FSAR, Chapter 14 (Ref. 2), contains analyses of accidents that result in both overheating and overcooling of the reactor core. MTC is one of the controlling parameters for core reactivity in these accidents. Both the most positive value and most negative value of the MTC are important to safety, and both values must be bounded. Values used in the analyses consider worst case conditions to ensure that the accident results are bounding (Ref. 3).

The consequences of accidents that cause core overheating must be evaluated when the MTC is positive. Such accidents include the rod withdrawal transient from either zero (Ref. 2) or RTP, loss of main feedwater flow, and loss of forced reactor coolant flow.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

The consequences of accidents that cause core overcooling must be evaluated when the MTC is negative. Such accidents include sudden feedwater flow increase and sudden decrease in feedwater temperature.

In order to ensure a bounding accident analysis, the MTC is assumed to be its most limiting value for the analysis conditions appropriate to each accident. The bounding value is determined by considering rodded and unrodded conditions, whether the reactor is at full or zero power, and whether it is the BOL or EOL. The most conservative combination appropriate to the accident is then used for the analysis (Ref. 2).

MTC values are bounded in reload safety evaluations assuming steady state conditions at BOL and EOL. An EOL measurement is conducted at conditions when the RCS boron concentration reaches approximately 300 ppm. The measured value may be extrapolated to project the EOL value, in order to confirm reload design predictions.

MTC satisfies Criterion 2 of 10 CFR 50.36. Even though it is not directly observed and controlled from the control room, MTC is considered an initial condition process variable because of its dependence on boron concentration.

LCO

LCO 3.1.3 requires the MTC to be within specified limits of the COLR to ensure that the core operates within the assumptions of the accident analysis. During the reload core safety evaluation, the MTC is analyzed to determine that its values remain within the bounds of the original accident analysis during operation.

Assumptions made in safety analyses require that the MTC be less positive than a given upper bound and more positive than a given lower bound. The MTC is most positive near BOL; this upper bound must not be exceeded. This maximum upper limit occurs at BOL, all rods out (ARO), hot zero power conditions.

(continued)

BASES

LCO (continued)

At EOL the MTC takes on its most negative value, when the lower bound becomes important. This LCO exists to ensure that both the upper and lower bounds are not exceeded.

During operation, therefore, the conditions of the LCO can only be ensured through measurement. The Surveillance checks at BOL and EOL on MTC provide confirmation that the MTC is behaving as anticipated so that the acceptance criteria are met.

The LCO establishes a maximum positive value that cannot be exceeded. The BOL positive limit and the EOL negative limit are established in the COLR to allow specifying limits for each particular cycle. This permits the unit to take advantage of improved fuel management and changes in unit operating schedule.

APPLICABILITY

Technical Specifications place both LCO and SR values on MTC, based on the safety analysis assumptions described above.

In MODE 1, the limits on MTC must be maintained to ensure that any accident initiated from THERMAL POWER operation will not violate the design assumptions of the accident analysis. In MODE 2 with the reactor critical, the upper limit must also be maintained to ensure that startup and subcritical accidents (such as the uncontrolled CONTROL ROD assembly or group withdrawal) will not violate the assumptions of the accident analysis. The lower MTC limit must be maintained in MODES 2 and 3, in addition to MODE 1, to ensure that cooldown accidents will not violate the assumptions of the accident analysis. In MODES 4, 5, and 6, this LCO is not applicable, since no Design Basis Accidents using the MTC as an analysis assumption are initiated from these MODES.

ACTIONS

A.1

If the BOL MTC limit is violated, administrative withdrawal limits for control banks must be established to maintain the MTC within its limits. The MTC becomes more negative with control bank insertion and decreased boron concentration. A Completion Time of 24 hours provides enough time for evaluating the MTC measurement and computing the required bank withdrawal limits.

(continued)

BASES

ACTIONS

A.1 (continued)

As cycle burnup is increased, the RCS boron concentration will be reduced. The reduced boron concentration causes the MTC to become more negative. Using physics calculations, the time in cycle life at which the calculated MTC will meet the LCO requirement can be determined. At this point in core life Condition A no longer exists. The unit is no longer in the Required Action, so the administrative withdrawal limits are no longer in effect.

B.1

If the required administrative withdrawal limits at BOL are not established within 24 hours, the unit must be brought to MODE 2 with $k_{eff} < 1.0$ to prevent operation with an MTC that is more positive than that assumed in safety analyses.

The allowed Completion Time of 6 hours is reasonable, based on operating experience, for reaching the required MODE from full power conditions in an orderly manner and without challenging plant systems.

C.1

Exceeding the EOL MTC limit means that the safety analysis assumptions for the EOL accidents that use a bounding negative MTC value may be invalid. If the EOL MTC limit is exceeded, the plant must be brought to a MODE or condition in which the LCO requirements are not applicable. To achieve this status, the unit must be brought to at least MODE 4 within 12 hours.

The allowed Completion Time is reasonable, based on operating experience, for reaching the required MODE from full power conditions in an orderly manner and without challenging plant systems.

(continued)

BASES (continued)

SURVEILLANCE REQUIREMENTS

SR 3.1.3.1

This SR requires measurement of the MTC at BOL prior to entering MODE 1 in order to demonstrate compliance with the most positive MTC LCO. Meeting the limit prior to entering MODE 1 ensures that the limit will also be met at higher power levels.

The BOL MTC value for ARO will be inferred from isothermal temperature coefficient measurements obtained during the physics tests after refueling. The ARO value can be directly compared to the BOL MTC limit of the LCO. If required, measurement results and predicted design values can be used to establish administrative withdrawal limits for control banks.

SR 3.1.3.2

In similar fashion, the LCO demands that the MTC be less negative than the specified value for EOL full power conditions. This measurement may be performed at any THERMAL POWER, but its results must be extrapolated to the conditions of RTP and all banks withdrawn in order to make a proper comparison with the LCO value. Because the RTP MTC value will gradually become more negative with further core depletion and boron concentration reduction, a 300 ppm SR value of MTC should necessarily be less negative than the EOL LCO limit. The 300 ppm SR value is sufficiently less negative than the EOL LCO limit value to ensure that the LCO limit will be met when the 300 ppm Surveillance criterion is met.

SR 3.1.3.2 is modified by three Notes that include the following requirements:

1. This SR is not required to be performed until 7 effective full power days (EFPD) after reaching the equivalent of an equilibrium RTP all rods out (ARO) boron concentration of 300 ppm.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.1.3.2 (continued)

2. If the 300 ppm Surveillance limit is exceeded, it is possible that the EOL limit on MTC could be reached before the planned EOL. Because the MTC changes slowly with core depletion, the Frequency of 14 effective full power days is sufficient to avoid exceeding the EOL limit.

3. The Surveillance limit for RTP boron concentration of 60 ppm is conservative. If the measured MTC at 60 ppm is more positive than the 60 ppm Surveillance limit, the EOL limit will not be exceeded because of the gradual manner in which MTC changes with core burnup.

REFERENCES

1. 10 CFR 50, Appendix A.

2. FSAR, Chapter 14.

3. WCAP 9273-NP-A, "Westinghouse Reload Safety Evaluation Methodology," July 1985.

B 3.1 REACTIVITY CONTROL SYSTEMS

B 3.1.4 Rod Group Alignment Limits

BASES

BACKGROUND

The OPERABILITY (i.e., trippability) of the shutdown and control rods is an initial assumption in all safety analyses that assume rod insertion upon reactor trip. Maximum rod misalignment is an initial assumption in the safety analysis that directly affects core power distributions and assumptions of available SDM.

The applicable criteria for these reactivity and power distribution design requirements are GDC 10, "Reactor Design," GDC 26, "Reactivity Control System Redundancy and Protection" (Ref. 1), and 10 CFR 50.46, "Acceptance Criteria for Emergency Core Cooling Systems for Light Water Nuclear Power Plants" (Ref. 2).

Mechanical or electrical failures may cause a control rod to become inoperable or to become misaligned from its group. Control rod inoperability or misalignment may cause increased power peaking, due to the asymmetric reactivity distribution and a reduction in the total available rod worth for reactor shutdown. Therefore, control rod alignment and OPERABILITY are related to core operation in design power peaking limits and the core design requirement of a minimum SDM.

Limits on control rod alignment have been established, and all rod positions are monitored and controlled during power operation to ensure that the power distribution and reactivity limits defined by the design power peaking and SDM limits are preserved.

Rod cluster control assemblies (RCCAs), or rods, are moved by their control rod drive mechanisms (CRDMs). Each CRDM moves its RCCA one step (approximately ⅝ inch) at a time, but at varying rates (steps per minute) depending on the signal output from the Rod Control System.

(continued)

BASES

BACKGROUND (continued)

The RCCAs are divided among control banks and shutdown banks. Each bank may be further subdivided into two groups to provide for precise reactivity control. A group consists of two or more RCCAs that are electrically paralleled to step simultaneously. A bank of RCCAs may consist of two groups that are moved in a staggered fashion, but always within one step of each other. IP3 has four control banks and four shutdown banks.

The shutdown banks are maintained either in the fully inserted or fully withdrawn position. The control banks are moved in an overlap pattern, using the following withdrawal sequence: When control bank A reaches a predetermined height in the core, control bank B begins to move out with control bank A. Control bank A stops at the position of maximum withdrawal, and control bank B continues to move out. When control bank B reaches a predetermined height, control bank C begins to move out with control bank B. This sequence continues until control banks A, B, and C are at the fully withdrawn position, and control bank D is at the desired position. The insertion sequence is the opposite of the withdrawal sequence. The control rods are arranged in a radially symmetric pattern, so that control bank motion does not introduce radial asymmetries in the core power distributions.

The axial position of shutdown rods and control rods is indicated by two separate and independent systems, which are the Bank Demand Position Indication System (commonly called group step counters) and the Individual Rod Position Indication (IRPI) System.

The Bank Demand Position Indication System counts the pulses from the rod control system that moves the rods. There is one step counter for each group of rods. Individual rods in a group all receive the same signal to move and should, therefore, all be at the same position indicated by the group step counter for that group. The Bank Demand Position Indication System is highly precise (± 1 step or ± 5/8 inch). If a rod does not move one step for each demand pulse, the step counter will still count the pulse and incorrectly reflect the position of the rod.

(continued)

BASES

BACKGROUND (continued)

The IRPI System provides an indication of actual control rod position, but at a lower precision than the step counters. This system is based on inductive analog signals from a coil stack located above the stepping mechanisms of the control rod magnetic jacks, external to the pressure housing, but concentric with the rod travel. When the associated control rod is at the bottom of the core, the magnetic coupling between the primary and secondary coil winding of the detector is small and there is a small voltage induced in the secondary. As the control rod is raised by the magnetic jacks, the relatively high permeability of the lift rod causes an increase in magnetic coupling. Thus, an analog signal proportional to rod position is obtained. The rod position maximum uncertainty is ± 12 steps (± 7.5 inches). Misalignment limit of 12 steps precludes a rod misalignment of > 15 inches when instrument error is considered. An indicated misalignment limit of 24 steps precludes a rod misalignment of > 22.5 inches when instrument error is considered. Additional misalignment is allowed near the fully withdrawn position because the top of the active core (approximately 225 steps) is less than the fully withdrawn position.

APPLICABLE SAFETY ANALYSES

Control rod misalignments are analyzed in Reference 4. The acceptance criteria for addressing control rod inoperability or misalignment are that:

a. There be no violations of:

   1. specified acceptable fuel design limits, or

   2. Reactor Coolant System (RCS) pressure boundary integrity; and

b. The core remains subcritical after accident transients.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

The analysis identifies six possible modes of control rod failure and translates these failure mechanisms into eight analyzed cases. The eight cases are analyzed at full and part power conditions, and they fall into the following categories:

1. One or more rods misaligned out.
2. One or more rods misaligned in.
3. One group misaligned in.
4. One group misaligned out.
5. One group misaligned out with another group from the same cabinet misaligned in.
6. One entire bank misaligned out with the other bank from the same cabinet misaligned in.

The first six analyses are perfomed with the rods at their insertion limits. The next two analyses are for positions at other than the insertion limits.

7. All rods inserted below rod insertion limit.
8. One or more rods misaligned from all-rods-out position.

These eight conditions were applied to 248 possible cases, representing a wide variety of plant conditions involving allowable deviation below 85% RTP (± 24 steps) and above 85% RTP (±12 steps). In all cases, the resulting peaking factor increase was within required limits. Core subcriticality is assured through evaluation of shutdown margin versus rod worth for each reload cycle.

The allowable deviation increases when the rods are near their fully withdrawn limit, as shown in Table 3.1.4-1. This is due to the fact that the top of the active core is at an equivalent rod position of about 224 steps withdrawn. Therefore, the effect of increased deviation in this region is reduced for bank demand positions within 12 steps of the top of the core and higher.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

The Required Actions in this LCO ensure that either deviations from the alignment limits will be corrected or that THERMAL POWER will be adjusted so that excessive local linear heat rates (LHRs) will not occur, and that the requirements on SDM and ejected rod worth are preserved.

Continued operation of the reactor with a misaligned control rod is allowed if the heat flux hot channel factor ($F_Q(Z)$) and the nuclear enthalpy hot channel factor ($F^N_{\Delta H}$) are verified to be within their limits in the COLR and the safety analysis is verified to remain valid. When a control rod is misaligned, the assumptions that are used to determine the rod insertion limits, AFD limits, and quadrant power tilt limits are not preserved.

Therefore, the limits may not preserve the design peaking factors, and $F_Q(Z)$ and $F^N_{\Delta H}$ must be verified directly by incore mapping. Bases Section 3.2 (Power Distribution Limits) contains more complete discussions of the relation of $F_Q(Z)$ and $F^N_{\Delta H}$ to the operating limits.

Shutdown and control rod OPERABILITY and alignment are directly related to power distributions and SDM, which are initial conditions assumed in safety analyses. Therefore they satisfy Criterion 2 of 10 CFR 50.36.

LCO

The limits on shutdown or control rod alignments ensure that the assumptions in the safety analysis will remain valid. The requirements on OPERABILITY ensure that upon reactor trip, the assumed reactivity will be available and will be inserted. The OPERABILITY requirements also ensure that the RCCAs and banks maintain the correct power distribution and rod alignment.

To ensure that individual rods are properly aligned with their associated group step counter demand position, the following limits are placed on individual rod positions:

(continued))

BASES

LCO (continued)

a. When THERMAL POWER is > 85% RTP, the difference between each individual indicated rod position and its group step counter demand position shall be within the limits specified in Table 3.1.4-1 for the group step counter demand position; and

b. When THERMAL POWER is ≤ 85% RTP, the difference between each individual indicated rod position and its group step counter demand position shall be within 24 steps.

These limits ensure analysis assumptions for SDM and peaking factors are met because an indicated misalignment of 12 steps precludes a rod misalignment of > 15 inches when instrument error is considered. An indicated misalignment limit of 24 steps precludes a rod misalignment of > 22.5 inches when instrument error is considered.

Failure to meet the requirements of this LCO may produce unacceptable power peaking factors and LHRs, or unacceptable SDMs, all of which may constitute initial conditions inconsistent with the safety analysis (Ref. 4).

APPLICABILITY

The requirements on RCCA OPERABILITY and alignment are applicable in MODES 1 and 2 because these are the only MODES in which neutron (or fission) power is generated, and the OPERABILITY (i.e., trippability) and alignment of rods have the potential to affect the safety of the plant. In MODES 3, 4, 5, and 6, the alignment limits do not apply because the control rods are typically bottomed and the reactor is shut down and not producing fission power. In the shutdown MODES, the OPERABILITY of the shutdown and control rods has the potential to affect the required SDM, but this effect can be compensated for by an increase in the boron concentration of the RCS. See LCO 3.1.1, "SHUTDOWN MARGIN (SDM)," for SDM in MODES 3, 4, and 5 and LCO 3.9.1, "Boron Concentration," for boron concentration requirements during refueling.

(continued)

BASES (continued)

ACTIONS

A.1.1 and A.1.2

When one or more rods are untrippable, there is a possibility that the required SDM may be adversely affected. Required Actions A.1.1 and A.1.2 apply if either SR 3.1.4.2 or SR 3.1.4.3 are not met. Under these conditions, it is important to determine the SDM, and if it is less than the required value, initiate boration until the required SDM is recovered. The Completion Time of 1 hour is adequate for determining SDM and, if necessary, for initiating emergency boration and restoring SDM.

In this situation, SDM verification must include the worth of the untrippable rod, as well as a rod of maximum worth.

A.2

If the untrippable rod(s) cannot be restored to OPERABLE status, the plant must be brought to a MODE or condition in which the LCO requirements are not applicable. 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, for reaching MODE 3 from full power conditions in an orderly manner and without challenging plant systems.

B.1

When a rod becomes misaligned, it can usually be moved and is still trippable. If the rod can be realigned within the Completion Time of 1 hour, local xenon redistribution during this short interval will not be significant, and operation may proceed without further restriction. If all individual indicated rod positions are within 24 steps of their group step counter demand position, the LCO may be met by reducing reactor power to ≤ 85% RTP.

(continued)

BASES

ACTIONS

B.1 (continued)

An alternative to realigning a single misaligned RCCA to the group average position is to align the remainder of the group to the position of the misaligned RCCA. However, this must be done without violating the bank sequence, overlap, and insertion limits specified in LCO 3.1.5, "Shutdown Bank Insertion Limits," and LCO 3.1.6, "Control Bank Insertion Limits." The Completion Time of 1 hour gives the operator sufficient time to adjust the rod positions in an orderly manner. A one-hour allowance for thermal stabilization of rod position instrumentation, as discussed in SR 3.1.4.1, applies when determining if a rod is misaligned.

B.2.1.1 and B.2.1.2

With a misaligned rod, SDM must be verified to be within limit or boration must be initiated to restore SDM to within limit.

In many cases, realigning the remainder of the group to the misaligned rod may not be desirable. For example, realigning control bank B to a rod that is misaligned 20 steps from the top of the core would require a significant power reduction, since control bank D must be moved fully in and control bank C must be moved in to approximately 100 to 115 steps.

Power operation may continue with one RCCA trippable but misaligned, provided that SDM is verified within 1 hour. The Completion Time of 1 hour represents the time necessary for determining the actual unit SDM and, if necessary, aligning and starting the necessary systems and components to initiate boration.

(continued)

BASES

ACTIONS (continued)

B.2.2, B.2.3, B.2.4, B.2.5, and B.2.6

For continued operation with a misaligned rod, RTP must be reduced, SDM must periodically be verified within limits, hot channel factors ($F_Q(Z)$ and $F^N_{\Delta H}$) must be verified within limits, and the safety analyses must be re-evaluated to confirm continued operation is permissible.

Reduction of power to 75% RTP ensures that local LHR increases due to a misaligned RCCA will not cause the core design criteria to be exceeded. The Completion Time of 2 hours gives the operator sufficient time to accomplish an orderly power reduction without challenging the Reactor Protection System.

When a rod is known to be misaligned, there is a potential to impact the SDM. Since the core conditions can change with time, periodic verification of SDM is required. A Frequency of 12 hours is sufficient to ensure this requirement continues to be met.

Verifying that $F_Q(Z)$ and $F^N_{\Delta H}$ are within the required limits ensures that current operation at 75% RTP with a rod misaligned is not resulting in power distributions that may invalidate safety analysis assumptions at full power. The Completion Time of 72 hours allows sufficient time to obtain flux maps of the core power distribution using the incore flux mapping system and to calculate $F_Q(Z)$ and $F^N_{\Delta H}$.

Once current conditions have been verified acceptable, time is available to perform evaluations of accident analysis to determine that core limits will not be exceeded during a Design Basis Event for the duration of operation under these conditions. A Completion Time of 5 days is sufficient time to obtain the required input data and to perform the analysis.

The analysis specified by Required Action B.2.6 must address the potential ejected rod worth, non-uniform fuel depletion, associated transient power distribution peaking factors and accidents. The following issues must also be addressed:

(continued)

BASES

ACTIONS

B.2.2, B.2.3, B.2.4, B.2.5, and B.2.6 (continued)

a. Rod cluster control assembly insertion characteristics;

b. Rod Cluster Control Assembly Misalignment;

c. Loss of reactor coolant from small ruptured pipes or from cracks in large pipes which actuates the emergency core cooling system;

d. Single rod cluster control assembly withdrawal at full power;

e. Major reactor coolant system pipe ruptures (loss of coolant accident);

f. Major Secondary system pipe rupture; and

g. Rupture of a control rod drive mechanism housing.

C.1

When Required Actions cannot be completed within their Completion Time, the unit must be brought to a MODE or Condition in which the LCO requirements are not applicable. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours, which obviates concerns about the development of undesirable xenon or power distributions. The allowed Completion Time of 6 hours is reasonable, based on operating experience, for reaching MODE 3 from full power conditions in an orderly manner and without challenging the plant systems.

D.1.1 and D.1.2

More than one control rod becoming misaligned from its group average position is not expected, and has the potential to reduce SDM. Therefore, SDM must be evaluated. One hour allows the operator adequate time to determine SDM. Restoration of the required SDM, if necessary, requires increasing the RCS boron

(continued)

BASES

ACTIONS

D.1.1 and D.1.2 (continued)

concentration to provide negative reactivity, as described in the Bases for LCO 3.1.1. The required Completion Time of 1 hour for initiating boration is reasonable, based on the time required for potential xenon redistribution, the low probability of an accident occurring, and the steps required to complete the action. This allows the operator sufficient time to align the required valves and start the boric acid pumps. Boration will continue until the required SDM is restored.

D.2

If more than one rod is found to be misaligned or becomes misaligned because of bank movement, the unit conditions fall outside of the accident analysis assumptions. Since automatic bank sequencing would continue to cause misalignment, the unit must be brought to a MODE or Condition in which the LCO requirements are not applicable. 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, for reaching MODE 3 from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE REQUIREMENTS

SR 3.1.4.1

Verification that individual rod positions are within alignment limits at a Frequency of 12 hours provides a history that allows the operator to detect a rod that is beginning to deviate from its expected position. Rod position may be verified using normal indication, direct readings using a digital voltmeter, or the plant computer. The specified Frequency takes into account other rod position information that is continuously available to the operator in the control room, so that during actual rod motion, deviations can immediately be detected. This SR is not required to be met for an individual control rod until 1 hour after

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.1.4.1 (continued)

completion of movement of that rod. This allowance is needed because it provides time for thermal stabilization of rod position instrumentation. This allowance is acceptable because individual rod position indicators may not accurately reflect control rod position prior to thermal stabilization and there is a presumption that individual control rods will move with their group.

SR 3.1.4.2

Verifying each control rod is OPERABLE would require that each rod be tripped. However, in MODES 1 and 2, tripping each control rod would result in radial or axial power tilts, or oscillations. Exercising each individual control rod every 92 days provides increased confidence that all rods continue to be OPERABLE without exceeding the alignment limit, even if they are not regularly tripped. Moving each control rod by 10 steps in a single direction will not cause radial or axial power tilts, or oscillations, to occur. This SR requires that control rods be inserted or withdrawn by at least 10 steps which is sufficient to ensure that rod movement can be confirmed by individual rod position indicators. Administrative controls and Technical Specification limits ensure that control rod insertion limits are met. The 92 day Frequency takes into consideration other information available to the operator in the control room and SR 3.1.4.1, which is performed more frequently and adds to the determination of OPERABILITY of the rods.

Between required performances of SR 3.1.4.2 (determination of control rod OPERABILITY by movement), if a control rod(s) is discovered to be immovable, but remains trippable and aligned, the control rod(s) is considered to be OPERABLE. At any time, if a control rod(s) is immovable, a determination of the trippability (OPERABILITY) of the control rod(s) must be made, and appropriate action taken.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.1.4.3

Verification of rod drop times allows the operator to determine that the maximum rod drop time permitted is consistent with the assumed rod drop time used in the safety analysis. Measuring rod drop times prior to reactor criticality, after reactor vessel head removal, ensures that the reactor internals and rod drive mechanism will not interfere with rod motion or rod drop time, and that no degradation in these systems has occurred that would adversely affect control rod motion or drop time. This testing is performed with all RCPs operating and the average moderator temperature ≥ 500°F to simulate a reactor trip under actual conditions.

This Surveillance is performed during a plant outage, due to the plant conditions needed to perform the SR and the potential for an unplanned plant transient if the Surveillance was performed with the reactor at power.

REFERENCES

1. 10 CFR 50, Appendix A.

2. 10 CFR 50.46.

3. FSAR, Chapter 14.

4. WCAP-14668, Conditional Extension of the Rod Misalignment Technical Specification for Indian Point Unit 3, October 1996 (Proprietary).

B 3.1 REACTIVITY CONTROL SYSTEMS

B 3.1.5 Shutdown Bank Insertion Limits

BASES

BACKGROUND

The insertion limits of the shutdown and control rods are initial assumptions in all safety analyses that assume rod insertion upon reactor trip. The insertion limits directly affect core power and fuel burnup distributions and assumptions of available ejected rod worth, SDM and initial reactivity insertion rate.

The applicable criteria for these reactivity and power distribution design requirements are GDC 10, "Reactor Design," GDC 26, "Reactivity Control System Redundancy and Protection," GDC 28, "Reactivity Limits" (Ref. 1), and 10 CFR 50.46, "Acceptance Criteria for Emergency Core Cooling Systems for Light Water Nuclear Power Reactors" (Ref. 2). Limits on control rod insertion have been established, and all rod positions are monitored and controlled during power operation to ensure that the power distribution and reactivity limits defined by the design power peaking and SDM limits are preserved.

The rod cluster control assemblies (RCCAs) are divided among control banks and shutdown banks. Each bank may be further subdivided into two groups to provide for precise reactivity control. A group consists of two or more RCCAs that are electrically paralleled to step simultaneously. A bank of RCCAs may consist of two groups that are moved in a staggered fashion, but always within one step of each other. IP3 has four control banks and four shutdown banks. See LCO 3.1.4, "Rod Group Alignment Limits," for control and shutdown rod OPERABILITY and alignment requirements, and LCO 3.1.7, "Rod Position Indication," for position indication requirements.

The control banks are used for precise reactivity control of the reactor. The positions of the control banks are normally automatically controlled by the Rod Control System, but they can also be manually controlled. They are capable of adding negative reactivity very quickly (compared to borating).

(continued)

BASES

BACKGROUND (continued)

The control banks must be maintained above designed insertion limits and are typically near the fully withdrawn position during normal full power operations.

Hence, they are not capable of adding a large amount of positive reactivity. Boration or dilution of the Reactor Coolant System (RCS) compensates for the reactivity changes associated with large changes in RCS temperature, power, and fuel depletion. The design calculations are performed with the assumption that the shutdown banks are withdrawn first. The shutdown banks can be fully withdrawn without the core going critical. This provides available negative reactivity in the event of boration errors. The shutdown banks are controlled manually by the control room operator. During normal unit operation, the shutdown banks are either fully withdrawn or fully inserted. The shutdown banks must be completely withdrawn from the core, prior to withdrawing any control banks during an approach to criticality. The shutdown banks are then left in this position until the reactor is shut down. They affect core power and burnup distribution, and add negative reactivity to shut down the reactor upon receipt of a reactor trip signal.

APPLICABLE SAFETY ANALYSES

On a reactor trip, all RCCAs (shutdown banks and control banks), except the most reactive RCCA, are assumed to insert into the core. The shutdown banks shall be at or above their insertion limits and available to insert the maximum amount of negative reactivity on a reactor trip signal. The control banks may be partially inserted in the core, as allowed by LCO 3.1.6, "Control Bank Insertion Limits." The shutdown bank and control bank insertion limits are established to ensure that a sufficient amount of negative reactivity is available to shut down the reactor and maintain the required SDM (see LCO 3.1.1, "SHUTDOWN MARGIN (SDM),") following a reactor trip from full power. The combination of control banks and shutdown banks (less the most reactive RCCA, which is assumed to be fully withdrawn) is sufficient to take the reactor from full power conditions at rated temperature to zero power, and to maintain the required SDM at rated no load temperature (Ref. 3).

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

The shutdown bank insertion limit also limits the reactivity worth of an ejected shutdown rod when at power.

The acceptance criteria for addressing shutdown and control rod bank insertion limits and inoperability or misalignment is that:

a. There be no violations of:

   1. Specified acceptable fuel design limits, or

   2. RCS pressure boundary integrity; and

b. The core remains subcritical after accident transients.

As such, the shutdown bank insertion limits affect safety analysis involving core reactivity and SDM (Ref. 3).

The shutdown bank insertion limits preserve an initial condition assumed in the safety analyses and, as such, satisfy Criterion 2 of 10 CFR 50.36.

LCO

The shutdown banks must be within their insertion limits any time the reactor is critical or approaching criticality. This ensures that a sufficient amount of negative reactivity is available to shut down the reactor and maintain the required SDM following a reactor trip.

The shutdown bank insertion limits are defined in the COLR.

APPLICABILITY

The shutdown banks must be within their insertion limits, with the reactor in MODES 1 and 2. The applicability in MODE 2 begins prior to initial control bank withdrawal, during an approach to criticality, and continues throughout MODE 2, until all control bank rods are again fully inserted by reactor trip or by shutdown. This ensures that a sufficient amount of negative reactivity is available to shut down the reactor and maintain the required SDM following a reactor trip.

(continued)

BASES

APPLICABILITY (continued)

The shutdown banks do not have to be within their insertion limits in MODE 3, unless an approach to criticality is being made. In MODE 4, 5, or 6, the shutdown banks are normally fully inserted in the core and contribute to the SDM. Refer to LCO 3.1.1 for SDM requirements in MODES 3, 4, and 5. LCO 3.9.1, "Boron Concentration," ensures adequate SDM in MODE 6.

The Applicability requirements have been modified by a Note indicating the LCO requirement is suspended during SR 3.1.4.2. This SR verifies the freedom of the rods to move, and requires the shutdown bank to move below the LCO limits, which would normally violate the LCO.

ACTIONS

A.1.1, A.1.2 and A.2

When one or more shutdown banks is not within insertion limits, 2 hours is allowed to restore the shutdown banks to within the insertion limits. This is necessary because the available SDM may be significantly reduced, with one or more of the shutdown banks not within their insertion limits. Also, verification of SDM or initiation of boration within 1 hour is required, since the SDM in MODES 1 and 2 is ensured by adhering to the control and shutdown bank insertion limits (see LCO 3.1.1). If shutdown banks are not within their insertion limits, then SDM will be verified by performing a reactivity balance calculation, considering the effects listed in the BASES for SR 3.1.1.1.

The allowed Completion Time of 2 hours provides an acceptable time for evaluating and repairing minor problems without allowing the plant to remain in an unacceptable condition for an extended period of time.

B.1

If the shutdown banks cannot be restored to within their insertion limits within 2 hours, the unit must be brought to a MODE where the LCO is not applicable. The allowed Completion Time of 6 hours is reasonable, based on operating experience, for reaching the required MODE from full power conditions in an orderly manner and without challenging plant systems.

(continued)

BASES (continued)

SURVEILLANCE REQUIREMENTS

SR 3.1.5.1

Verification that the shutdown banks are within their insertion limits prior to an approach to criticality ensures that when the reactor is critical, or being taken critical, the shutdown banks will be available to shut down the reactor, and the required SDM will be maintained following a reactor trip. This SR and Frequency ensure that the shutdown banks are withdrawn before the control banks are withdrawn during a unit startup.

Since the shutdown banks are positioned manually by the control room operator, a verification of shutdown bank position at a Frequency of 12 hours, after the reactor is taken critical, is adequate to ensure that they are within their insertion limits. Also, the 12 hour Frequency takes into account other information available in the control room for the purpose of monitoring the status of shutdown rods.

REFERENCES

1. 10 CFR 50, Appendix A.

2. 10 CFR 50.46.

3. FSAR, Chapter 14.

B 3.1 REACTIVITY CONTROL SYSTEMS

B 3.1.6 Control Bank Insertion Limits

BASES

BACKGROUND

The insertion limits of the shutdown and control rods are initial assumptions in all safety analyses that assume rod insertion upon reactor trip. The insertion limits directly affect core power and fuel burnup distributions and assumptions of available SDM, and initial reactivity insertion rate.

The applicable criteria for these reactivity and power distribution design requirements are GDC 10, "Reactor Design," GDC 26, "Reactivity Control System Redundancy and Protection," GDC 28, "Reactivity Limits" (Ref. 1), and 10 CFR 50.46, "Acceptance Criteria for Emergency Core Cooling Systems for Light Water Nuclear Power Reactors" (Ref. 2). Limits on control rod insertion have been established, and all rod positions are monitored and controlled during power operation to ensure that the power distribution and reactivity limits defined by the design power peaking and SDM limits are preserved.

The rod cluster control assemblies (RCCAs) are divided among control banks and shutdown banks. Each bank may be further subdivided into two groups to provide for precise reactivity control. A group consists of two or more RCCAs that are electrically paralleled to step simultaneously. A bank of RCCAs may consist of two groups that are moved in a staggered fashion, but always within one step of each other. IP3 has four control banks and four shutdown banks. See LCO 3.1.4, "Rod Group Alignment Limits," for control and shutdown rod OPERABILITY and alignment requirements, and LCO 3.1.7, "Rod Position Indication," for position indication requirements.

The control bank insertion limits are specified in the COLR. The control banks are required to be at or above the insertion limit. The COLR also indicates how the control banks are moved in an overlap pattern. Overlap is the distance traveled together by two control banks. The fully withdrawn position is defined in the COLR.

(continued)

BASES

BACKGROUND (continued)

The control banks are used for precise reactivity control of the reactor. The positions of the control banks are normally controlled automatically by the Rod Control System, but can also be manually controlled. They are capable of adding reactivity very quickly (compared to borating or diluting).

The power density at any point in the core must be limited, so that the fuel design criteria are maintained. Together, LCO 3.1.4, "Rod Group Alignment Limits", LCO 3.1.5, "Shutdown Bank Insertion Limits," LCO 3.1.6, "Control Bank Insertion Limits", LCO 3.2.3, "AXIAL FLUX DIFFERENCE (AFD)," and LCO 3.2.4, "QUADRANT POWER TILT RATIO (QPTR)," provide limits on control component operation and on monitored process variables, which ensure that the core operates within the fuel design criteria.

The shutdown and control bank insertion and alignment limits, AFD, and QPTR are process variables that together characterize and control the three dimensional power distribution of the reactor core. Additionally, the control bank insertion limits control the reactivity that could be added in the event of a rod ejection accident, and the shutdown and control bank insertion limits ensure the required SDM is maintained.

Operation within the subject LCO limits will prevent fuel cladding failures that would breach the primary fission product barrier and release fission products to the reactor coolant in the event of a loss of coolant accident (LOCA), loss of flow, ejected rod, or other accident requiring termination by a Reactor Protection System (RPS) trip function.

APPLICABLE SAFETY ANALYSES

The shutdown and control bank insertion limits, AFD, and QPTR LCOs are required to prevent power distributions that could result in fuel cladding failures in the event of a LOCA, loss of flow, ejected rod, or other accident requiring termination by an RTS trip function.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

The acceptance criteria for addressing shutdown and control bank insertion limits and inoperability or misalignment are that:

a. There be no violations of:

1. specified acceptable fuel design limits, or

2. Reactor Coolant System pressure boundary integrity; and

b. The core remains subcritical after accident transients.

As such, the shutdown and control bank insertion limits affect safety analysis involving core reactivity and power distributions (Ref. 3).

The SDM requirement is ensured by limiting the control and shutdown bank insertion limits so that allowable inserted worth of the RCCAs is such that sufficient reactivity is available in the rods to shut down the reactor to hot zero power with a reactivity margin that assumes the maximum worth RCCA remains fully withdrawn upon trip (Ref. 3).

Operation at the insertion limits or AFD limits may approach the maximum allowable linear heat generation rate or peaking factor with the allowed QPTR present. Operation at the insertion limit may also indicate the maximum ejected RCCA worth could be equal to the limiting value in fuel cycles that have sufficiently high ejected RCCA worths.

The control and shutdown bank insertion limits ensure that safety analyses assumptions for SDM, ejected rod worth, and power distribution peaking factors are preserved (Ref. 3).

The insertion limits satisfy Criterion 2 of 10 CFR 50.36 because they are initial conditions assumed in the safety analysis.

(continued)

BASES (continued)

LCO

The limits on control banks sequence, overlap, and physical insertion, as defined in the COLR, must be maintained because they serve the function of preserving power distribution, ensuring that the SDM is maintained, ensuring that ejected rod worth is maintained, and ensuring adequate negative reactivity insertion is available on trip. The overlap between control banks provides more uniform rates of reactivity insertion and withdrawal and is imposed to maintain acceptable power peaking during control bank motion.

APPLICABILITY

The control bank sequence, overlap, and physical insertion limits shall be maintained with the reactor in MODES 1 and 2 with $k_{eff} \geq 1.0$. These limits must be maintained, since they preserve the assumed power distribution, ejected rod worth, SDM, and reactivity rate insertion assumptions. Applicability in MODES 3, 4, and 5 is not required, since neither the power distribution nor ejected rod worth assumptions would be exceeded in these MODES.

The applicability requirements have been modified by a Note indicating the LCO requirements are suspended during the performance of SR 3.1.4.2. This SR verifies the freedom of the rods to move, and requires the control bank to move below the LCO limits, which would violate the LCO.

ACTIONS

A.1.1, A.1.2, A.2, B.1.1, B.1.2, and B.2

When the control banks are outside the acceptable insertion limits, they must be restored to within those limits. This restoration can occur in two ways:

a. Reducing power to be consistent with rod position; or

b. Moving rods to be consistent with power.

(continued)

BASES

ACTIONS

A.1.1, A.1.2, A.2, B.1.1, B.1.2, and B.2 (continued)

Also, verification of SDM or initiation of boration to regain SDM is required within 1 hour, since the SDM in MODES 1 and 2 normally ensured by adhering to the control and shutdown bank insertion limits (see LCO 3.1.1, "SHUTDOWN MARGIN (SDM)") has been upset. If control banks are not within their insertion limits, then SDM will be verified by performing a reactivity balance calculation, considering the effects listed in the BASES for SR 3.1.1.1.

Similarly, if the control banks are found to be out of sequence or in the wrong overlap configuration, they must be restored to meet the limits.

Operation beyond the LCO limits is allowed for a short time period in order to take conservative action because the simultaneous occurrence of either a LOCA, loss of flow accident, ejected rod accident, or other accident during this short time period, together with an inadequate power distribution or reactivity capability, has an acceptably low probability.

The allowed Completion Time of 2 hours for restoring the banks to within the insertion, sequence, and overlaps limits provides an acceptable time for evaluating and repairing minor problems without allowing the plant to remain in an unacceptable condition for an extended period of time.

C.1

If Required Actions A.1 and A.2, or B.1 and B.2 cannot be completed within the associated Completion Times, the plant must be brought to MODE 3, where the LCO is not applicable. The allowed Completion Time of 6 hours is reasonable, based on operating experience, for reaching the required MODE from full power conditions in an orderly manner and without challenging plant systems.

(continued)

BASES (continued)

SURVEILLANCE REQUIREMENTS

SR 3.1.6.1

This Surveillance is required to ensure that the reactor does not achieve criticality with the control banks below their insertion limits.

The estimated critical position (ECP) depends upon a number of factors, one of which is xenon concentration. If the ECP was calculated for a time different from when criticality occurs, xenon concentration could change to make the ECP substantially in error. Conversely, determining the ECP immediately before criticality could be an unnecessary burden. There are a number of unit parameters requiring operator attention at that point. Verifying the ECP calculation within 4 hours prior to criticality avoids a large error from changes in xenon concentration, but allows the operator some flexibility to schedule the ECP calculation with other startup activities.

SR 3.1.6.2

Verification of the control bank insertion limits at a Frequency of 12 hours is sufficient to detect control banks that may be approaching the insertion limits since, normally, very little rod motion occurs in 12 hours.

SR 3.1.6.3

When control banks are maintained within their insertion limits as checked by SR 3.1.6.2 above, it is unlikely that their sequence and overlap will not be in accordance with requirements provided in the COLR. A Frequency of 12 hours is consistent with the insertion limit check above in SR 3.1.6.2.

REFERENCES

1. 10 CFR 50, Appendix A.

2. 10 CFR 50.46.

3. FSAR, Chapter 14.

B 3.1 REACTIVITY CONTROL SYSTEM

B 3.1.7 Rod Position Indication

BASES

BACKGROUND

According to GDC 13 (Ref. 1), instrumentation to monitor variables and systems over their operating ranges during normal operation, anticipated operational occurrences, and accident conditions must be OPERABLE. LCO 3.1.7 is required for rod cluster control assemblies (RCCAs), or rods, to ensure OPERABILITY of position indicators to determine control rod positions and thereby ensure compliance with the rod alignment and insertion limits.

The OPERABILITY, including position indication, of the shutdown and control rods is an initial assumption in all safety analyses that assume rod insertion upon reactor trip. Maximum rod misalignment is an initial assumption in the safety analysis that directly affects core power distributions and assumptions of available SDM. Rod position indication is required to assess OPERABILITY and misalignment.

Mechanical or electrical failures may cause a rod to become inoperable or to become misaligned from its group. Rod inoperability or misalignment may cause increased power peaking, due to the asymmetric reactivity distribution and a reduction in the total available rod worth for reactor shutdown. Therefore, rod alignment and OPERABILITY are related to core operation in design power peaking limits and the core design requirement of a minimum SDM.

Limits on rod alignment and OPERABILITY have been established, and all rod positions are monitored and controlled during power operation to ensure that the power distribution and reactivity limits defined by the design power peaking and SDM limits are preserved.

Rod cluster control assemblies (RCCAs), or rods, are moved out of the core (up or withdrawn) or into the core (down or inserted) by their control rod drive mechanisms. The RCCAs are divided among control banks and shutdown banks. Each bank may be further subdivided into two groups to provide for precise reactivity control.

(continued)

BASES

BACKGROUND (continued)

The axial position of shutdown rods and control rods are determined by two separate and independent systems: the Bank Demand Position Indication System (commonly called group step counters) and the Individual Rod Position Indication (IRPI) System.

The Bank Demand Position Indication System counts the pulses from the Rod Control System that move the rods. There is one step counter for each group of rods. Individual rods in a group all receive the same signal to move and should, therefore, all be at the same position indicated by the group step counter for that group. The Bank Demand Position Indication System is considered highly precise (± 1 step or ± ⅝ inch). If a rod does not move one step for each demand pulse, the step counter will still count the pulse and incorrectly reflect the position of the rod.

The IRPI System provides an accurate indication of actual control rod position, but at a lower precision than the step counters. This system is based on inductive analog signals from a coil stack located above the stepping mechanisms of the control rod magnetic jacks, external to the pressure housing, but concentric with the rod travel. When the associated control rod is at the bottom of the core, the magnetic coupling between the primary and secondary coil winding of the detector is small and there is a small voltage induced in the secondary. As the control rod is raised by the magnetic jacks, the relatively high permeability of the lift rod causes an increase in magnetic coupling. Thus, an analog signal proportional to rod position is obtained. An indicated misalignment limit of 12 steps precludes a rod misalignment of > 15 inches when instrument error is considered. An indicated misalignment limit of 24 steps precludes a rod misalignment of > 22.5 inches when instrument error is considered.

APPLICABLE SAFETY ANALYSES

Control and shutdown rod position accuracy is essential during power operation. Power peaking, ejected rod worth, or SDM limits may be violated in the event of a Design Basis Accident (Ref. 2), with control orshutdown rods operating outside their

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

limits undetected. Therefore, the acceptance criteria for rod position indication is that rod positions must be known with sufficient accuracy in order to verify the core is operating within the group sequence, overlap, design peaking limits, ejected rod worth, and with minimum SDM (LCO 3.1.5, "Shutdown Bank Insertion Limits," and LCO 3.1.6, "Control Bank Insertion Limits"). The rod positions must also be known in order to verify the alignment limits are preserved (LCO 3.1.4, "Rod Group Alignment Limits"). Rod positions are continuously monitored to provide operators with information that ensures the plant is operating within the bounds of the accident analysis assumptions.

The rod position indicator channels satisfy Criterion 2 of 10 CFR 50.36. The control rod position indicators monitor rod position, which is an initial condition of the accident.

LCO

LCO 3.1.7 specifies that one IRPI System and one Bank Demand Position Indication System be OPERABLE for each rod. For the rod position indicators to be OPERABLE, the SR of the LCO and the following must be met:

a. The IRPI System indicates within the required number of steps of the group step counter demand position as required by LCO 3.1.4, "Rod Group Alignment Limits";

b. For the IRPI System there are no failed coils; and

c. The Bank Demand Indication System has been calibrated either in the fully inserted position or to the IRPI System.

The agreement limit between the Bank Demand Position Indication System and the IRPI System indicates that the Bank Demand Position Indication System is adequately calibrated, and can be used for indication of the measurement of control rod bank position.

(continued)

BASES

LCO (continued)

A deviation of less than the allowable limit, given in LCO 3.1.4, in position indication for a single rod, ensures high confidence that the position uncertainty of the corresponding rod group is within the assumed values used in the analysis (that specified rod group insertion limits).

These requirements ensure that rod position indication during power operation and PHYSICS TESTS is accurate, and that design assumptions are not challenged.

OPERABILITY of the position indicator channels ensures that inoperable, misaligned, or mispositioned rods can be detected. Therefore, power peaking, ejected rod worth, and SDM can be controlled within acceptable limits.

APPLICABILITY

The requirements on the IRPI and step counters are only applicable in MODES 1 and 2 (consistent with LCO 3.1.4, LCO 3.1.5, and LCO 3.1.6), because these are the only MODES in which power is generated, and the OPERABILITY and alignment of rods have the potential to affect the safety of the plant. In the shutdown MODES, the OPERABILITY of the shutdown and control banks has the potential to affect the required SDM, but this effect can be compensated for by an increase in the boron concentration of the Reactor Coolant System.

ACTIONS

The ACTIONS table is modified by a Note indicating that a separate Condition entry is allowed for each inoperable rod position indicator and each demand position indicator. This is acceptable because the Required Actions for each Condition provide appropriate compensatory actions for each inoperable position indicator.

A.1

When one IRPI channel per group fails, the position of the rod may still be determined indirectly by use of the movable incore detectors. The Required Action may also be satisfied by ensuring at least once per 8 hours that F_Q satisfies LCO 3.2.1, $F_{\Delta}H$ satisfies LCO 3.2.2, and shutdown MARGIN is within the limits provided in the COLR, provided the nonindicating rods have not been moved.

(continued)

BASES

ACTIONS

A.1 (continued)

Based on experience, normal power operation does not require excessive movement of banks. If a bank has been significantly moved, the Required Action of C.1 or C.2 below is required.

Therefore, verification of RCCA position within the Completion Time of 8 hours is adequate for allowing continued full power operation, since the probability of simultaneously having a rod significantly out of position and an event sensitive to that rod position is small.

Note that an IRPI channel is not inoperable if rod position can be determined using a digital voltmeter in lieu of the installed indicators.

A.2

Reduction of THERMAL POWER to ≤ 50% RTP puts the core into a condition where rod position is not significantly affecting core peaking factors (Ref. 2).

The allowed Completion Time of 8 hours is reasonable, based on operating experience, for reducing power to ≤ 50% RTP from full power conditions without challenging plant systems and allowing for rod position determination by Required Action A.1 above.

B.1, B.2, B.3 and B.4

When more than one IRPI per group fail, additional actions are necessary to ensure that acceptable power distribution limits are maintained, minimum SDM is maintained, and the potential effects of rod misalignment on associated accident analyses are limited. Placing the Rod Control System in manual assures unplanned rod motion will not occur. Together with the indirect position determination available via movable incore detectors will minimize the potential for rod misalignment. The immediate Completion Time for placing the Rod Control System in manual reflects the urgency with which unplanned rod motion must be prevented while in this condition.

(continued)

BASES

ACTIONS

B.1, B.2, B.3 and B.4 (continued)

Monitoring and recording reactor coolant T_{avg} help assure that significant changes in power distribution and SDM are avoided. The once per hour Completion Time is acceptable because only minor fluctuations in RCS Temperature are expected at steady state plant operating conditions.

The position of the rods may be determined indirectly by use of the movable incore detectors. The Required Action may also be satisfied by ensuring at least once per 8 hours that F_Q satisfies LCO 3.2.1, $F^N_{\Delta}H$ satisfies LCO 3.2.2, and SHUTDOWN MARGIN is within the limits provided in the COLR, provided the nonindicating rods have not been moved. Verification of control rod position once per 8 hours is adequate for allowing ocntinued full power operation of for a lmited, 24 hour period, since the probability of simultaneously having a rod significantly out of position and an event sensitive to that rod position is small. The 24 hour Completion Time provides sufficient time to troubleshoot and restore the PRPS system to operation while avoiding the plant challenges associated with a shutdown without full rod position indication.

Based on operating experience, normal power operation does not require excessive rod movement. If one or more rods have been significantly moved, the Required Action of C.1 or C.2 below is required.

C.1 and C.2

These Required Actions clarify that when one or more rods with inoperable position indicators have been moved in excess of 24 steps in one direction, since the position was last determined, the Required Actions of A.1 and A.2 are still appropriate but must be initiated promptly under Required Action C.1 to begin verifying that these rods are still properly positioned, relative to their group positions.

(continued)

BASES

ACTIONS

C.1 and C.2 (continued)

If, within 4 hours, the rod positions have not been determined, THERMAL POWER must be reduced to ≤ 50% RTP within 8 hours to avoid undesirable power distributions that could result from continued operation at ≥ 50% RTP, if one or more rods are misaligned by more than 24 steps. The allowed Completion Time of 4 hours provides an acceptable period of time to verify the rod positions.

D.1.1 and D.1.2

With one demand position indicator per bank inoperable (i.e., bank demand position cannot be determined), the rod positions can be determined by the IRPI System. Since normal power operation does not require excessive movement of rods, verification by administrative means that the rod position indicators are OPERABLE and the most withdrawn rod and the least withdrawn rod are ≤ 12 steps apart when > 85% RTP and ≤ 24 steps apart when ≤ 85% RTP within the allowed Completion Time of once every 8 hours is adequate.

D.2

Reduction of THERMAL POWER to ≤ 50% RTP puts the core into a condition where rod position is not significantly affecting core peaking factor limits. The allowed Completion Time of 8 hours provides an acceptable period of time to verify the rod positions per Required Actions C.1.1 and C.1.2 or reduce power to ≤ 50% RTP.

E.1

If the Required Actions cannot be completed within the associated Completion Time, the plant must be brought to a MODE in which the requirement does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours. The allowed Completion Time is reasonable, based on operating experience, for reaching the required MODE from full power conditions in an orderly manner and without challenging plant systems.

(continued)

BASES (continued)

SURVEILLANCE REQUIREMENTS

SR 3.1.7.1

Verification that the IRPI agrees with the demand position within the required number of steps ensures that the IRPI is operating correctly. This surveillance is performed prior to reactor criticality after each removal of the reactor vessel head because there is a potential for unnecessary plant transients if the SR were performed with the reactor at power.

REFERENCES

1. 10 CFR 50, Appendix A.

2. FSAR, Chapter 14.

3. WCAP-14668, Conditional Extension of the Rod Misalignment Technical Specification for Indian Point Unit 3, October 1996 (Proprietary).

B 3.1 REACTIVITY CONTROL SYSTEMS

B 3.1.8 PHYSICS TESTS Exceptions – MODE 2

BASES

BACKGROUND

The primary purpose of the MODE 2 PHYSICS TESTS exceptions is to permit relaxations of existing LCOs to allow certain PHYSICS TESTS to be performed.

Section XI of 10 CFR 50, Appendix B (Ref. 1), requires that a test program be established to ensure that structures, systems, and components will perform satisfactorily in service. All functions necessary to ensure that the specified design conditions are not exceeded during normal operation and anticipated operational occurrences must be tested. This testing is an integral part of the design, construction, and operation of the plant. Requirements for notification of the NRC, for the purpose of conducting tests and experiments, are specified in 10 CFR 50.59 (Ref. 2).

The key objectives of a test program (Ref. 3) are to:

a. Ensure that the facility has been adequately designed;

b. Validate the analytical models used in the design and analysis;

c. Verify the assumptions used to predict unit response; and

d. Ensure that installation of equipment in the facility has been accomplished in accordance with the design.

To accomplish these objectives, testing is performed prior to initial criticality, during startup, during low power operations, during power ascension, and after each refueling. The PHYSICS TESTS requirements for reload fuel cycles ensure that the operating characteristics of the core are consistent with the design predictions and that the core can be operated as designed (Ref. 4).

(continued)

BASES

BACKGROUND (continued)

PHYSICS TESTS procedures are written and approved in accordance with established formats. The procedures include all information necessary to permit a detailed execution of the testing required to ensure that the design intent is met. PHYSICS TESTS are performed in accordance with these procedures and test results are approved prior to continued power escalation and long term power operation.

The PHYSICS TESTS required for reload fuel cycles (Ref.4) in MODE 2 are listed below:

a. Critical Boron Concentration - Control Rods Withdrawn;
b. Control Rod Worth;
c. Isothermal Temperature Coefficient (ITC); and
d. Neutron Flux Symmetry.

These and other supplementary tests may be required to calibrate the nuclear instrumentation or to diagnose operational problems. These tests may cause the operating controls and process variables to deviate from their LCO requirements during their performance.

APPLICABLE SAFETY ANALYSES

The fuel is protected by LCOs that preserve the initial conditions of the core assumed during the safety analyses. The methods for development of the LCOs that are excepted by this LCO are described in the Westinghouse Reload Safety Evaluation Methodology Report (Ref. 5). These PHYSICS TESTS, and other tests that may be required to calibrate nuclear instrumentation or to diagnose operational problems, may require the operating control or process variables to deviate from their LCO limitations.

The FSAR defines requirements for initial testing of the facility, including PHYSICS TESTS. Requirements for reload fuel cycle PHYSICS TESTS are defined in ANSI/ANS-19.6.1-1985 (Ref. 4). Although these PHYSICS TESTS are generally accomplished within the limits for all LCOs, conditions may occur when one or more LCOs must be suspended to make completion of PHYSICS TESTS possible or practical.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

This is acceptable as long as the fuel design criteria are not violated. When one or more of the requirements specified in LCO 3.1.3, "Moderator Temperature Coefficient (MTC)," LCO 3.1.4, "Group Rod Alignments", LCO 3.1.5, "Shutdown Bank Insertion Limits", LCO 3.1.6, "Control Bank Insertion Limits", and LCO 3.4.2, "RCS Minimum Temperature for Criticality", are suspended for PHYSICS TESTS, the fuel design criteria are preserved as long as the power level is limited to ≤ 5% RTP, the reactor coolant temperature is kept ≥ 540°F, and SDM is kept within the limits specified in the COLR for low power physics tests.

The PHYSICS TESTS include measurement of core nuclear parameters or the exercise of control components that affect process variables. Among the process variables involved are AFD and QPTR, which represent initial conditions of the unit safety analyses. Also involved are Rod Cluster Control Assemblies (RCCAs) or control rods (control and shutdown rods), which are required to shut down the reactor. The limits for these variables are specified for each fuel cycle in the COLR. PHYSICS TESTS meet the criteria for inclusion in the Technical Specifications, since the components and process variable LCOs suspended during PHYSICS TESTS meet Criteria 1, 2, and 3 of 10 CFR 50.36.

Reference 6 allows special test exceptions (STEs) to be included as part of the LCO that they affect. It was decided, however, to retain this STE as a separate LCO because it was less cumbersome and provided additional clarity.

LCO

This LCO allows the reactor MTC to be outside its specified limits. In addition, it allows selected control and shutdown rods to be positioned outside of their specified alignment and insertion limits. Operation beyond specified limits is permitted for the purpose of performing PHYSICS TESTS and poses no threat to fuel integrity, provided the SRs are met.

(continued)

BASES

LCO (continued)

The requirements of LCO 3.1.3, LCO 3.1.4, LCO 3.1.5, LCO 3.1.6, and LCO 3.4.2 may be suspended during the performance of PHYSICS TESTS provided:

a. RCS lowest loop average temperature is ≥ 540 °F;

b. SDM is within the limit specified in the COLR; and

c. THERMAL POWER is ≤ 5% RTP.

APPLICABILITY

This LCO is applicable in MODE 2 when performing low power PHYSICS TESTS. The applicable PHYSICS TESTS are performed in MODE 2 at HZP.

ACTIONS

A.1 and A.2

If the SDM requirement is not met, boration must be initiated promptly. A Completion Time of 15 minutes is adequate for an operator to correctly align and start the required systems and components. The operator should begin boration with the best source available for the plant conditions. Boration will be continued until SDM is within limit.

Suspension of PHYSICS TESTS exceptions requires restoration of each of the applicable LCOs to within specification.

B.1

When THERMAL POWER is > 5% RTP, as indicated on power range instruments, the only acceptable action is to open the reactor trip breakers (RTBs) to prevent operation of the reactor beyond its design limits. Immediately opening the RTBs will shut down the reactor and prevent operation of the reactor outside of its design limits.

(continued)

BASES

ACTIONS (continued)

C.1

When the RCS lowest T_{avg} is < 540°F, the appropriate action is to restore T_{avg} to within its specified limit. The allowed Completion Time of 15 minutes provides time for restoring T_{avg} to within limits without allowing the plant to remain in an unacceptable condition for an extended period of time. Operation with the reactor critical and with temperature below 540°F could violate the assumptions for accidents analyzed in the safety analyses.

D.1

If the Required Actions cannot be completed within the associated Completion Time, the plant must be brought to a MODE in which the requirement does not apply. To achieve this status, the plant must be brought to at least MODE 3 within an additional 15 minutes. The Completion Time of 15 additional minutes is reasonable, based on operating experience, for reaching MODE 3 in an orderly manner and without challenging plant systems.

SURVEILLANCE REQUIREMENTS

SR 3.1.8.1

The power range and intermediate range neutron detectors must be verified to be OPERABLE in MODE 2 by LCO 3.3.1, "Reactor Protection System (RPS) Instrumentation." The frequency is specified in LCO 3.3.1. A CHANNEL OPERATIONAL TEST is normally performed on each power range and intermediate range channel prior to initiation of the PHYSICS TESTS. This will ensure that the RPS is properly aligned to provide the required degree of core protection during the performance of the PHYSICS TESTS.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.1.8.2

Verification that the RCS lowest loop T_{avg} is ≥ 540°F will ensure that the unit is not operating in a condition that could invalidate the safety analyses. Verification of the RCS temperature at a Frequency of 30 minutes during the performance of the PHYSICS TESTS will ensure that the initial conditions of the safety analyses are not violated.

SR 3.1.8.3

Verification that THERMAL POWER is ≤ 5% RTP will ensure that the plant is not operating in a condition that could invalidate the safety analysis. Verification of THERMAL POWER at a Frequency of 30 minutes during the performance of the PHYSICS TESTS will ensure that the initial conditions of the safety analyses are not violated.

SR 3.1.8.4

The SDM is verified by performing a reactivity balance calculation, considering the following reactivity effects:

a. RCS boron concentration;

b. Control bank position;

c. RCS average temperature;

d. Fuel burnup based on gross thermal energy generation;

e. Xenon concentration;

f. Samarium concentration; and

g. Isothermal temperature coefficient (ITC).

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.1.8.4 (continued)

Using the ITC accounts for Doppler reactivity in this calculation when the reactor is subcritical, and the fuel temperature will be changing at the same rate as the RCS.

The Frequency of 24 hours is based on the generally slow change in required boron concentration and on the low probability of an accident occurring without the required SDM.

REFERENCES

1. 10 CFR 50, Appendix B, Section XI.

2. 10 CFR 50.59.

3. Regulatory Guide 1.68, Revision 2, August, 1978.

4. ANSI/ANS-19.6.1-1985, December 13, 1985.

5. WCAP-9273-NP-A, "Westinghouse Reload Safety Evaluation Methodology Report," July 1985.

6. WCAP-11618, including Addendum 1, April 1989.

B 3.2 POWER DISTRIBUTION LIMITS

B 3.2.1 Heat Flux Hot Channel Factor ($F_Q(Z)$)

BASES

BACKGROUND

The purpose of the limits on the values of $F_Q(Z)$ is to limit the local (i.e., pellet) peak power density. The value of $F_Q(Z)$ varies along the axial height (Z) of the core.

$F_Q(Z)$ is defined as the maximum local fuel rod linear power density divided by the average fuel rod linear power density, assuming nominal fuel pellet and fuel rod dimensions. Therefore, $F_Q(Z)$ is a measure of the peak fuel pellet power within the reactor core.

During power operation, the global power distribution is limited by LCO 3.2.3, "AXIAL FLUX DIFFERENCE (AFD)," and LCO 3.2.4, "QUADRANT TILT POWER RATIO (QPTR)," which are directly and continuously measured process variables. These LCOs, along with LCO 3.1.6, "Control Bank Insertion Limits," maintain the core limits on power distributions on a continuous basis.

$F_Q(Z)$ varies with fuel loading patterns, control bank insertion, fuel burnup, and changes in axial power distribution.

$F_Q(Z)$ is measured periodically using the incore detector system. These measurements are generally taken with the core at or near steady state conditions.

Using the measured three dimensional power distributions, it is possible to derive a measured value for $F_Q(Z)$. However, because this value represents a steady state condition, it does not include the variations in the value of $F_Q(Z)$ that are present during nonequilibrium situations.

Core monitoring and control under nonsteady state conditions are accomplished by operating the core within the limits of the appropriate LCOs, including the limits on AFD, QPTR, and control rod insertion.

(continued)

BASES (continued)

APPLICABLE SAFETY ANALYSES

This LCO precludes core power distributions that violate the following fuel design criteria:

a. During a large break loss of coolant accident (LOCA), the peak cladding temperature must not exceed 2200°F (Ref. 1);

b. During a loss of forced reactor coolant flow accident, there must be at least 95% probability at the 95% confidence level (the 95/95 DNB criterion) that the hot fuel rod in the core does not experience a departure from nucleate boiling (DNB) condition;

c. During an ejected rod accident, the energy deposition to the fuel must not exceed 225 calories/gram for non-irradiated fuel and 200 calories/gram for irradiated fuel (Ref. 2); and

d. The control rods must be capable of shutting down the reactor with a minimum required SDM with the highest worth control rod stuck fully withdrawn (Ref. 3).

Limits on $F_Q(Z)$ ensure that the value of the initial total peaking factor assumed in the accident analyses remains valid. Other criteria must also be met (e.g., maximum cladding oxidation, maximum hydrogen generation, coolable geometry, and long term cooling). However, the peak cladding temperature is typically most limiting.

$F_Q(Z)$ limits assumed in the LOCA analysis are typically limiting relative to (i.e., lower than) the $F_Q(Z)$ limit assumed in safety analyses for other postulated accidents. Therefore, this LCO provides conservative limits for other postulated accidents.

$F_Q(Z)$ satisfies Criterion 2 of 10 CFR 50.36.

(continued)

BASES (continued)

LCO

The Heat Flux Hot Channel Factor, $F_Q(Z)$, shall be limited by the following relationships:

$$F_Q(Z) \leq \frac{FQ}{P} K(Z) \qquad \text{for } P > 0.5$$

$$F_Q(Z) \leq \frac{FQ}{0.5} K(Z) \qquad \text{for } P \leq 0.5$$

where: FQ is the $F_Q(Z)$ limit at RTP provided in the COLR,

K(Z) is the normalized $F_Q(Z)$ as a function of core height provided in the COLR, and

$$P = \frac{\text{THERMAL POWER}}{\text{RTP}}$$

The current IP3 specific values of FQ and K(Z) are given in the COLR.

An $F_Q(Z)$ evaluation requires obtaining an incore flux map in MODE 1. From the incore flux map results we obtain the measured value ($F_Q^M(Z)$) of $F_Q(Z)$. Then,

$$F_Q(Z) = F_Q^M(Z)\ 1.0815$$

where 1.0815 is a factor that accounts for fuel manufacturing tolerances and flux map measurement uncertainty. This correction factor for the measured value of total peaking factor $F_Q^M(Z)$ is for the three percent needed to account for manufacturing tolerances and this value is further increased by five percent to account for measurement error.

The $F_Q(Z)$ limits define limiting values for core power peaking that precludes peak cladding temperatures exceeding 2200°F during either a large or small break LOCA.

This LCO requires operation within the bounds assumed in the safety analyses. Calculations are performed in the core design process to confirm that the core can be controlled in such a

(continued)

BASES

LCO (continued)

manner during operation that it can stay within the LOCA $F_Q(Z)$ limits. If $F_Q(Z)$ cannot be maintained within the LCO limits, reduction of the core power is required.

Violating the LCO limits for $F_Q(Z)$ produces unacceptable consequences if a design basis event occurs while $F_Q(Z)$ is outside its specified limits.

APPLICABILITY

The $F_Q(Z)$ limits must be maintained in MODE 1 to prevent core power distributions from exceeding the limits assumed in the safety analyses. Applicability in other MODES is not required because there is either insufficient stored energy in the fuel or insufficient energy being transferred to the reactor coolant to require a limit on the distribution of core power.

ACTIONS

A.1

Reducing THERMAL POWER by ≥ 1% RTP for each 1% by which $F_Q(Z)$ exceeds its limit, maintains an acceptable absolute power density. The Completion Time of 15 minutes provides an acceptable time to reduce power in an orderly manner and without allowing the plant to remain in an unacceptable condition for an extended period of time. The maximum allowable power level initially determined by Required Action A.1 may be affected by subsequent determinations of $F_Q(Z)$ and would require power reductions within 15 minutes of the $F_Q(Z)$ determination, if necessary, to comply with the decreased maximum allowable power level. Decreases in the $F_Q(Z)$ would allow increasing the maximum allowable power level and increasing power up to this revised limit.

A.2

A reduction of the Power Range Neutron Flux – High trip setpoints by ≥ 1% for each 1% by which $F_Q(Z)$ exceeds its limit, is a conservative action for protection against the consequences of severe transients with unanalyzed power distributions. The Completion Time of 72 hours is sufficient considering the small likelihood of a severe transient in this time period and the

(continued)

BASES

ACTIONS

A.2 (continued)

preceding prompt reduction in THERMAL POWER in accordance with Required Action A.1. The maximum allowable Power Range Neutron Flux - High trip setpoints initially determined by Required Action A.2 may be affected by subsequent determinations of $F_Q(Z)$ and would require reductions for the Power Range Neutron Flux - High trip setpoints within 72 hours of the $F_Q(Z)$ determination, if necessary, to comply with the decreased maximum allowable power level. Decreases in the $F_Q(Z)$ would allow increasing the Power Range Neutron Flux - High trip setpoints.

A.3

Reduction in the Overpower ΔT trip setpoints by $\geq$ 1% for each 1% by which $F_Q(Z)$ exceeds its limit, is a conservative action for protection against the consequences of severe transients with unanalyzed power distributions. The Completion Time of 72 hours is sufficient considering the small likelihood of a severe transient in this time period, and the preceding prompt reduction in THERMAL POWER in accordance with Required Action A.1. The maximum allowable Overpower ΔT trip setpoints initially determined by Required Action A.3 may be affected by subsequent determinations of $F_Q(Z)$ and would require reductions for the Overpower ΔT setpoints within 72 hours of the $F_Q(Z)$ determination, if necessary, to comply with the decreased maximum allowable power level. Decreases in the $F_Q(Z)$ would allow increasing the Overpower ΔT trip setpoints.

A.4

Verification that $F_Q(Z)$ has been restored to within its limit, by performing SR 3.2.1.1 prior to increasing THERMAL POWER above the limit imposed by Required Action A.1, ensures that core conditions during operation at higher power levels are consistent with safety analyses assumptions.

(continued)

BASES

ACTIONS (continued)

B.1.

If Required Actions A.1 through A.3 are not met within their associated Completion Times, the plant must be placed in a mode or condition in which the LCO requirements are not applicable. This is done by placing the plant in at least MODE 2 within 6 hours.

This allowed Completion Time is reasonable based on operating experience regarding the amount of time it takes to reach MODE 2 from full power operation in an orderly manner and without challenging plant systems.

SURVEILLANCE REQUIREMENTS

SR 3.2.1.1 is modified by a Note. The Note applies during the first power ascension after a refueling. It states that THERMAL POWER may be increased until an equilibrium power level has been achieved at which a power distribution map can be obtained. This allowance is modified, however, by one of the Frequency conditions that requires verification that $F_Q(Z)$ is within specified limits after a power rise of more than 10% RTP over the THERMAL POWER at which it was last verified to be within specified limits. Because $F_Q(Z)$ could not have previously been measured in this reload core, there is a second Frequency condition, applicable only for reload cores, that requires determination of these parameters before exceeding 75% RTP. This ensures that some determination of $F_Q(Z)$ is made at a lower power level at which adequate margin is available before going to 100% RTP. Also, this Frequency condition, together with the Frequency condition requiring verification of $F_Q(Z)$ following a power increase of more than 10%, ensures that it was verified as soon as RTP (or any other level for extended operation) is achieved. In the absence of these Frequency conditions, it is possible to increase power to RTP and operate for 31 days without verification of $F_Q(Z)$. The Frequency condition is not intended to require verification of these parameters after every 10% increase in power level above the last verification. It only requires verification after a power level is achieved for extended operation that is 10% higher than that power at which F_Q was last measured.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.2.1.1

Verification that $F_Q(Z)$ is within its specified limits involves increasing $F_Q^M(Z)$ to allow for manufacturing tolerance and measurement uncertainties in order to obtain $F_Q(Z)$. Specifically, $F_Q^M(Z)$ is the measured value of $F_Q(Z)$ obtained from incore flux map results and $F_Q(Z) = F_Q^M(Z)$ 1.0815 (Ref. 4). $F_Q(Z)$ is then compared to its specified limits.

The limit with which $F_Q(Z)$ is compared varies inversely with power above 50% RTP and directly with a function called K(Z) provided in the COLR.

Performing this Surveillance in MODE 1 prior to exceeding 75% RTP ensures that the $F_Q(Z)$ limit is met when RTP is achieved, because the highest peaking factors (i.e., the ratio of local power density to the core average power density) generally decrease as core average power level is increased.

If THERMAL POWER has been increased by ≥ 10% RTP since the last determination of $F_Q(Z)$, another evaluation of this factor is required 12 hours after achieving equilibrium conditions at this higher power level (to ensure that $F_Q(Z)$ values are being reduced sufficiently with power increase to stay within the LCO limits).

The Frequency of 31 EFPD is adequate to monitor the change of power distribution with core burnup because such changes are slow and well controlled when the plant is operated in accordance with the Technical Specifications (TS).

REFERENCES

1. 10 CFR 50.46, 1974.

2. FSAR 14.2.6.

3. 10 CFR 50, Appendix A.

4. WCAP-7308-L-P-A, "Evaluation of Nuclear Hot Channel Factor Uncertainties".

B 3.2 POWER DISTRIBUTION LIMITS

B 3.2.2 Nuclear Enthalpy Rise Hot Channel Factor ($F^N_{\Delta H}$)

BASES

BACKGROUND

The purpose of this LCO is to establish limits on the power density at any point in the core so that the fuel design criteria are not exceeded and the accident analysis assumptions remain valid. The design limits on local (pellet) and integrated fuel rod peak power density are expressed in terms of hot channel factors. Control of the core power distribution with respect to these factors ensures that local conditions in the fuel rods and coolant channels do not challenge core integrity at any location during either normal operation or a postulated accident analyzed in the safety analyses.

$F^N_{\Delta H}$ is defined as the ratio of the integral of the linear power along the fuel rod with the highest integrated power to the average integrated fuel rod power. Therefore, $F^N_{\Delta H}$ is a measure of the maximum total power produced in a fuel rod.

$F^N_{\Delta H}$ is sensitive to fuel loading patterns, bank insertion, and fuel burnup. $F^N_{\Delta H}$ typically increases with control bank insertion and typically decreases with fuel burnup.

$F^N_{\Delta H}$ is not directly measurable but is inferred from a power distribution map obtained with the movable incore detector system. Specifically, the results of the three dimensional power distribution map are analyzed by a computer to determine $F^N_{\Delta H}$. This factor is calculated at least every 31 EFPD. However, during power operation, the global power distribution is monitored by LCO 3.2.3, "AXIAL FLUX DIFFERENCE (AFD)," and LCO 3.2.4, "QUADRANT POWER TILT RATIO (QPTR)," which address directly and continuously measured process variables.

The COLR provides peaking factor limits that ensure that the design basis value of the departure from nucleate boiling (DNB) is met for normal operation, operational transients, and any transient condition arising from events of moderate frequency.

(continued)

BASES

BACKGROUND (continued)

The DNB design basis precludes DNB and is met by limiting the minimum local DNB heat flux ratio to 1.3 using the W3 CHF correlation. All DNB limited transient events are assumed to begin with an $F^N_{\Delta H}$ value that satisfies the LCO requirements. Operation outside the LCO limits may produce unacceptable consequences if a DNB limiting event occurs. The DNB design basis ensures that there is no overheating of the fuel that results in possible cladding perforation with the release of fission products to the reactor coolant.

APPLICABLE SAFETY ANALYSES

Limits on $F^N_{\Delta H}$ preclude core power distributions that exceed the following fuel design limits:

a. There must be at least 95% probability at the 95% confidence level (the 95/95 DNB criterion) that the hottest fuel rod in the core does not experience a DNB condition;

b. During a large break loss of coolant accident (LOCA), peak cladding temperature (PCT) must not exceed 2200°F;

c. During an ejected rod accident, the energy deposition to the fuel must not exceed 225 calories/gram for non-irradiated fuel and 200 calories/gram for irradiated fuel (Ref. 1); and

d. Fuel design limits required by GDC 26 (Ref. 2) for the condition when control rods must be capable of shutting down the reactor with a minimum required SDM with the highest worth control rod stuck fully withdrawn.

For transients that may be DNB limited, the Reactor Coolant System flow and $F^N_{\Delta H}$ are the core parameters of most importance. The limits on $F^N_{\Delta H}$ ensure that the DNB design basis is met for normal operation, operational transients, and any transients arising from events of moderate frequency. The DNB design basis is met by limiting the minimum DNBR to the 95/95 DNB criterion of 1.3 using the W3 CHF correlation. This value provides a high degree of assurance that the hottest fuel rod in the core does not experience a DNB.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

The allowable $F^N_{\Delta H}$ limit increases with decreasing power level. This functionality in $F^N_{\Delta H}$ is included in the analyses that provide the Reactor Core Safety Limits (SLs) of SL 2.1.1. Therefore, any DNB events in which the calculation of the core limits is modeled implicitly use this variable value of $F^N_{\Delta H}$ in the analyses. Likewise, all transients that may be DNB limited are assumed to begin with an initial $F^N_{\Delta H}$ as a function of power level defined by the COLR limit equation.

The LOCA safety analysis indirectly models $F^N_{\Delta H}$ as an input parameter. The Nuclear Heat Flux Hot Channel Factor ($F_Q(Z)$) and the axial peaking factors are inserted directly into the LOCA safety analyses that verify the acceptability of the resulting peak cladding temperature (Ref. 3).

The fuel is protected in part by Technical Specifications, which ensure that the initial conditions assumed in the safety and accident analyses remain valid. The following LCOs ensure this: LCO 3.2.3, "AXIAL FLUX DIFFERENCE (AFD)," LCO 3.2.4, "QUADRANT POWER TILT RATIO (QPTR)," LCO 3.1.6, "Control Bank Insertion Limits," LCO 3.2.2, "Nuclear Enthalpy Rise Hot Channel Factor ($F^N_{\Delta H}$)," and LCO 3.2.1, "Heat Flux Hot Channel Factor ($F_Q(Z)$)."

$F^N_{\Delta H}$ and $F_Q(Z)$ are measured periodically using the movable incore detector system. Measurements are generally taken with the core at, or near, steady state conditions. Core monitoring and control under transient conditions (Condition 1 events) are accomplished by operating the core within the limits of the LCOs on AFD, QPTR, and Bank Insertion Limits.

$F^N_{\Delta H}$ satisfies Criterion 2 of 10 CFR 50.36.

LCO

$F^N_{\Delta H}$ shall be maintained within the limits of the relationship provided in the COLR.

The $F^N_{\Delta H}$ limit identifies the coolant flow channel with the maximum enthalpy rise. This channel has the least additional heat removal capability and thus the highest probability for a DNB.

(continued)

BASES

LCO (continued)

The limiting value of $F^N_{\Delta H}$, described by the equation contained in the COLR, is the design radial peaking factor used in the unit safety analyses.

A power multiplication factor in this equation includes an additional margin for higher radial peaking from reduced thermal feedback and greater control rod insertion at low power levels. The limiting value of $F^N_{\Delta H}$ is allowed to increase a small amount for every 1% RTP reduction in THERMAL POWER as specified in the COLR.

APPLICABILITY

The $F^N_{\Delta H}$ limits must be maintained in MODE 1 to preclude core power distributions from exceeding the fuel design limits for DNBR and PCT. Applicability in other modes is not required because there is either insufficient stored energy in the fuel or insufficient energy being transferred to the coolant to require a limit on the distribution of core power. Specifically, the design bases events that are sensitive to $F^N_{\Delta H}$ in other modes (MODES 2 through 5) have significant margin to DNB, and therefore, there is no need to restrict $F^N_{\Delta H}$ in these modes.

ACTIONS

A.1.1

With $F^N_{\Delta H}$ exceeding its limit, the unit is allowed 4 hours to restore $F^N_{\Delta H}$ to within its limits. This restoration may, for example, involve realigning any misaligned rods or reducing power enough to bring $F^N_{\Delta H}$ within its power dependent limit. When the $F^N_{\Delta H}$ limit is exceeded, the DNBR limit is not likely violated in steady state operation, because events that could significantly perturb the $F^N_{\Delta H}$ value (e.g., static control rod misalignment) are considered in the safety analyses. However, the DNBR limit may be violated if a DNB limiting event occurs. Thus, the allowed Completion Time of 4 hours provides an acceptable time to restore $F^N_{\Delta H}$ to within its limits without allowing the plant to remain in an unacceptable condition for an extended period of time.

Condition A is modified by a Note that requires that Required Actions A.2 and A.3 must be completed whenever Condition A is entered.

(continued)

BASES

ACTIONS

A.1.1 (continued)

Thus, if power is not reduced because this Required Action is completed within the 4 hour time period, Required Action A.2 nevertheless requires another measurement and calculation of $F^N_{\Delta H}$ within 24 hours in accordance with SR 3.2.2.1.

However, if power is reduced below 50% RTP, Required Action A.3 requires that another determination of $F^N_{\Delta H}$ must be done prior to exceeding 50% RTP, prior to exceeding 75% RTP, and within 24 hours after reaching or exceeding 95% RTP. In addition, Required Action A.2 is performed if power ascension is delayed past 24 hours.

A.1.2.1 and A.1.2.2

If the value of $F^N_{\Delta H}$ is not restored to within its specified limit either by adjusting a misaligned rod or by reducing THERMAL POWER, the alternative option is to reduce THERMAL POWER to < 50% RTP in accordance with Required Action A.1.2.1 and reduce the Power Range Neutron Flux - High to ≤ 55% RTP in accordance with Required Action A.1.2.2. Reducing THERMAL POWER to < 50% RTP increases the DNB margin and does not likely cause the DNBR limit to be violated in steady state operation. The reduction in trip setpoints ensures that continuing operation remains at an acceptable low power level with adequate DNBR margin. The allowed Completion Time of 4 hours for Required Action A.1.2.1 is consistent with those allowed for in Required Action A.1.1 and provides an acceptable time to reach the required power level from full power operation without allowing the plant to remain in an unacceptable condition for an extended period of time. The Completion Times of 4 hours for Required Actions A.1.1 and A.1.2.1 are not additive.

The allowed Completion Time of 72 hours to reset the trip setpoints per Required Action A.1.2.2 recognizes that, once power is reduced, the safety analysis assumptions are satisfied and there is no urgent need to reduce the trip setpoints. This is a sensitive operation that may inadvertently trip the Reactor Protection System.

(continued)

BASES

ACTIONS (continued)

A.2

Once the power level has been reduced to < 50% RTP per Required Action A.1.2.1, an incore flux map (SR 3.2.2.1) must be obtained and the measured value of $F^N_{\Delta H}$ verified not to exceed the allowed limit at the lower power level. The unit is provided 20 additional hours to perform this task over and above the 4 hours allowed by either Action A.1.1 or Action A.1.2.1. The Completion Time of 24 hours is acceptable because of the increase in the DNB margin, which is obtained at lower power levels, and the low probability of having a DNB limiting event within this 24 hour period. Additionally, operating experience has indicated that this Completion Time is sufficient to obtain the incore flux map, perform the required calculations, and evaluate $F^N_{\Delta H}$.

A.3

Verification that $F^N_{\Delta H}$ is within its specified limits after an out of limit occurrence ensures that the cause that led to the $F^N_{\Delta H}$ exceeding its limit is corrected, and that subsequent operation proceeds within the LCO limit. This Action demonstrates that the $F^N_{\Delta H}$ limit is within the LCO limits prior to exceeding 50% RTP, again prior to exceeding 75% RTP, and within 24 hours after THERMAL POWER is ≥ 95% RTP.

This Required Action is modified by a Note that states that THERMAL POWER does not have to be reduced prior to performing this Action.

B.1

When Required Actions A.1.1 through A.3 cannot be completed within their required Completion Times, the plant must be placed in a mode in which the LCO requirements are not applicable. This is done by placing the plant in at least MODE 2 within 6 hours. The allowed Completion Time of 6 hours is reasonable, based on operating experience regarding the time required to reach MODE 2 from full power conditions in an orderly manner and without challenging plant systems.

(continued)

BASES (continued)

SURVEILLANCE REQUIREMENTS

SR 3.2.2.1

The value of $F^N_{\Delta H}$ is determined by using the movable incore detector system to obtain a flux distribution map. A data reduction computer program then calculates the maximum value of $F^N_{\Delta H}$ from the measured flux distributions. The measured value of $F^N_{\Delta H}$ must be multiplied by 1.04 to account for measurement uncertainty before making comparisons to the $F^N_{\Delta H}$ limit.

After each refueling, $F^N_{\Delta H}$ must be determined in MODE 1 prior to exceeding 75% RTP. This requirement ensures that $F^N_{\Delta H}$ limits are met at the beginning of each fuel cycle.

The 31 EFPD Frequency is acceptable because the power distribution changes relatively slowly over this amount of fuel burnup. Accordingly, this Frequency is short enough that the $F^N_{\Delta H}$ limit cannot be exceeded for any significant period of operation.

REFERENCES

1. FSAR 14.2.6.

2. 10 CFR 50, Appendix A.

3. 10 CFR 50.46.

B 3.2 POWER DISTRIBUTION LIMITS

B 3.2.3 AXIAL FLUX DIFFERENCE (AFD) (Constant Axial Offset Control (CAOC) Methodology)

BASES

BACKGROUND

The purpose of this LCO is to establish limits on the values of the AFD in order to limit the axial power distribution skewing to either the top or bottom of the core. By limiting the amount of power distribution skewing, core peaking factors are consistent with the assumptions used in the safety analyses. Limiting power distribution skewing over time also minimizes the xenon distribution skewing, which is a significant factor in axial power distribution control.

The operating scheme used to control the axial power distribution, CAOC, involves maintaining the AFD within a tolerance band around a burnup dependent target, known as the target flux difference, to minimize the variation of the axial peaking factor and axial xenon distribution during unit maneuvers.

The target flux difference is determined at equilibrium xenon conditions. The control banks must be positioned within the core in accordance with their insertion limits and Control Bank D should be inserted near its normal position (i.e., ≥ 190 steps withdrawn) for steady state operation at high power levels. The power level should be as near RTP as practical. The value of the target flux difference obtained under these conditions divided by the Fraction of RTP is the target flux difference at RTP for the associated core burnup conditions. Target flux differences for other THERMAL POWER levels are obtained by multiplying the RTP value by the appropriate fractional THERMAL POWER level.

Periodic updating of the target flux difference value is necessary to follow the change of the flux difference at steady state conditions with burnup.

The Nuclear Enthalpy Rise Hot Channel Factor ($F^N_{\Delta H}$) and QPTR LCOs limit the radial component of the peaking factors.

(continued)

BASES

BACKGROUND (continued)

The shape of the power profile in the axial (i.e., the vertical) direction is largely under the control of the operator, through either the manual operation of the control banks, or automatic motion of control banks responding to temperature deviations resulting from either manual operation of the Chemical and Volume Control System to change boron concentration, or from power level changes.

APPLICABLE SAFETY ANALYSES

The AFD is a measure of axial power distribution skewing to the top or bottom half of the core. The AFD is sensitive to many core related parameters such as control bank positions, core power level, axial burnup, axial xenon distribution and, to a lesser extent, reactor coolant temperature and boron concentrations. The allowed range of the AFD is used in the nuclear design process to confirm that operation within these limits produces core peaking factors and axial power distributions that meet safety analysis requirements.

The CAOC methodology entails:

a. Establishing an envelope of allowed power shapes and power densities;

b. Devising an operating strategy for the cycle that maximizes unit flexibility (maneuvering) and minimizes axial power shape changes;

c. Demonstrating that this strategy does not result in core conditions that violate the envelope of permissible core power characteristics; and

d. Demonstrating that this power distribution control scheme can be effectively supervised with excore detectors.

The limits on the AFD ensure that the Heat Flux Hot Channel Factor ($F_Q(Z)$) is not exceeded during either normal operation or in the event of xenon redistribution following power changes.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

The limits on the AFD also limit the range of power distributions that are assumed as initial conditions in analyzing Condition 2, 3, and 4 events. This ensures that fuel cladding integrity is maintained for these postulated accidents. The most important Condition 4 event is the loss of coolant accident. The most significant Condition 3 event is the loss of flow accident. The most significant Condition 2 events are uncontrolled bank withdrawal and boration or dilution accidents. Condition 2 accidents, assumed to begin from within the AFD limits, are used to confirm the adequacy of Overpower ΔT and Overtemperature ΔT trip setpoints.

The limits on the AFD satisfy Criterion 2 of 10 CFR 50.36.

LCO

Signals are available to the operator from the Nuclear Instrumentation System (NIS) excore neutron detectors (Ref. 1). Separate signals are taken from the top and bottom detectors. The AFD is defined as the difference in normalized flux signals between the top and bottom excore detector in each detector well. For convenience, this flux difference is converted to provide flux difference units expressed as a percentage and labeled as %Δ flux or %ΔI.

The AFD LCO establishes the limits for how much and for how long the measured AFD may deviate from a predetermined (i.e., target) AFD. The amount that the measured AFD may deviate from the target AFD is called the "target band" which is specified in the COLR. If the measured AFD is within the "target band," then there are no restrictions on plant operations.

If the measured AFD cannot be consistently maintained within the "target band" but can be maintained within the "acceptable operation limits," then reactor power must be reduced to < 90% RTP. However, even with power reduced, the measured AFD must be maintained within the target band for 23 out of every 24 hours (i.e., the cumulative penalty deviation time cannot be exceeded); otherwise additional power reductions are required.

(continued)

BASES

LCO (continued)

If the measured axial flux difference cannot be maintained within the "acceptable operation limits" or the cumulative penalty deviation time for operating outside the target band is exceeded, then reactor power must be reduced to < 50% RTP. There are no restrictions on measured AFD when reactor power is < 50% RTP; however, the measured AFD must be within the "target band" for a specified period of time (i.e., the cumulative penalty deviation time must be within a specified limit) before reactor power can be increased ≥ 50% RTP.

The required target band varies with axial burnup distribution, which in turn varies with the core average accumulated burnup. The target band defined in the COLR may provide one target band for the entire cycle or more than one band, each to be followed for a specific range of cycle burnup.

With THERMAL POWER ≥ 90% RTP, the AFD must be kept within the target band. With the AFD outside the target band with THERMAL POWER ≥ 90% RTP, the assumptions of the accident analyses may be violated.

The frequency of monitoring the AFD by the unit computer is once per minute providing an essentially continuous accumulation of penalty deviation time that allows the operator to accurately assess the status of the penalty deviation time.

Violating the LCO on the AFD could produce unacceptable consequences if a Condition 2, 3, or 4 event occurs while the AFD is outside its limits.

Target band and AFD acceptable operation limits are specified in the COLR.

The LCO is modified by four Notes. Note 1 states the conditions necessary for declaring the AFD outside of the target band. Notes 2 and 3 describe how the cumulative penalty deviation time is calculated. It is intended that the unit is operated with the AFD within the target band about the target flux difference. However, during rapid THERMAL POWER reductions, control bank motion may cause the AFD to deviate outside of the target band at reduced THERMAL POWER levels.

(continued)

BASES

LCO (continued)

This deviation does not affect the xenon distribution sufficiently to change the envelope of peaking factors that may be reached on a subsequent return to RTP with the AFD within the target band, provided the time duration of the deviation is limited. Accordingly, while THERMAL POWER is ≥ 50% RTP and < 90% RTP (i.e., Part b of this LCO), a 1 hour cumulative penalty deviation time limit, cumulative during the preceding 24 hours, is allowed during which the unit may be operated outside of the target band but within the acceptable operation limits provided in the COLR (Note 2). This penalty time is accumulated at the rate of 1 minute for each 1 minute of operating time within the power range of Part b of this LCO (i.e., THERMAL POWER ≥ 50% RTP). The cumulative penalty time is the sum of penalty times from Parts b and c of this LCO.

For THERMAL POWER levels > 15% RTP and < 50% RTP (i.e., Part c of this LCO), deviations of the AFD outside of the target band are less significant. Note 3 allows the accumulation of ½ minute penalty deviation time per 1 minute of actual time outside the target band and reflects this reduced significance. With THERMAL POWER < 15% RTP, AFD is not a significant parameter in the assumptions used in the safety analysis and, therefore, requires no limits. Because the xenon distribution produced at THERMAL POWER levels less than RTP does affect the power distribution as power is increased, unanalyzed xenon and power distribution is prevented by limiting the accumulated penalty deviation time.

For surveillance of the power range channels performed according to SR 3.3.1.6, Note 4 allows deviation outside the target band for 16 hours and no penalty deviation time is accumulated. Some deviation in the AFD is required for doing the NIS calibration with the incore detector system.

APPLICABILITY

AFD requirements are applicable in MODE 1 above 15% RTP. Above 50% RTP, the combination of THERMAL POWER and core peaking factors are the core parameters of primary importance in safety analyses (Ref. 1).

(continued)

BASES

APPLICABILITY (continued)

Between 15% RTP and 90% RTP, this LCO is applicable to ensure that the distributions of xenon are consistent with safety analysis assumptions.

At or below 15% RTP and for lower operating MODES, the stored energy in the fuel and the energy being transferred to the reactor coolant are low. The value of the AFD in these conditions does not affect the consequences of the design basis events.

Low signal levels in the excore channels may preclude obtaining valid AFD signals below 15% RTP.

ACTIONS

A.1

With the AFD outside the target band and THERMAL POWER ≥ 90% RTP, the assumptions used in the accident analyses may be violated with respect to the maximum heat generation. Therefore, a Completion Time of 15 minutes is allowed to restore the AFD to within the target band because xenon distributions change little in this relatively short time.

B.1

If the AFD cannot be restored within the target band, then reducing THERMAL POWER to < 90% RTP places the core in a condition that has been analyzed and found to be acceptable, provided that the AFD is within the acceptable operation limits provided in the COLR.

The allowed Completion Time of 15 minutes provides an acceptable time to reduce power to < 90% RTP without allowing the plant to remain in an unanalyzed condition for an extended period of time.

C.1

With THERMAL POWER < 90% RTP but ≥ 50% RTP, operation with the AFD outside the target band is allowed for up to 1 hour if the AFD is within the acceptable operation limits provided in the COLR.

(continued)

BASES

ACTIONS

C.1 (continued)

With the AFD within these limits, the resulting axial power distribution is acceptable as an initial condition for accident analyses assuming the then existing xenon distributions. The 1 hour cumulative penalty deviation time restricts the extent of xenon redistribution. Without this limitation, unanalyzed xenon axial distributions may result from a different pattern of xenon buildup and decay. The reduction to a power level < 50% RTP puts the reactor at a THERMAL POWER level at which the AFD is not a significant accident analysis parameter.

If the indicated AFD is outside the target band and outside the acceptable operation limits provided in the COLR, the peaking factors assumed in accident analysis may be exceeded with the existing xenon condition. (Any AFD within the target band is acceptable regardless of its relationship to the acceptable operation limits.) The Completion Time of 30 minutes allows for a prompt, yet orderly, reduction in power.

Condition C is modified by a Note that requires that Required Action C.1 must be completed whenever this Condition is entered.

SURVEILLANCE REQUIREMENTS

SR 3.2.3.1

The AFD is monitored on an automatic basis using the unit process computer that has an AFD monitor alarm. The computer determines the 1 minute average of each of the OPERABLE excore detector outputs and provides an alarm if the AFDs for two or more OPERABLE excore channels are outside the target band and the THERMAL POWER is > 90% RTP. During operation at THERMAL POWER levels < 90% RTP but > 15% RTP, the computer provides an alarm when the cumulative penalty deviation time is > 1 hour in the previous 24 hours.

This Surveillance verifies that the AFD as indicated by the NIS excore channels is within the target band and consistent with the status of the AFD monitor alarm.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.2.3.1 (continued)

The Surveillance Frequency of 7 days is adequate because the AFD is controlled by the operator and monitored by the process computer. Furthermore, any deviations of the AFD from the target band that is not alarmed should be readily noticed.

SR 3.2.3.2

With the AFD monitor alarm inoperable, the AFD is monitored to detect operation outside of the target band and to compute the penalty deviation time. During operation at ≥ 90% RTP, the AFD is monitored at a Surveillance Frequency of 15 minutes to ensure that the AFD is within its limits at high THERMAL POWER levels. At power levels < 90% RTP, but > 15% RTP, the Surveillance Frequency is reduced to 1 hour because the AFD may deviate from the target band for up to 1 hour using the methodology of Parts B and C of this LCO to calculate the cumulative penalty deviation time before corrective action is required.

SR 3.2.3.2 is modified by a Note that states that monitored and logged values of the AFD are assumed to exist for the preceding 24 hour interval in order for the operator to compute the cumulative penalty deviation time. The AFD should be monitored more frequently in periods of operation for which the power level or control bank positions are changing to allow corrective measures when the AFD is more likely to move outside the target band.

SR 3.2.3.3

This Surveillance requires that the target flux difference is updated at a Frequency of 31 effective full power days (EFPD) to account for small changes that may occur in the target flux differences in that period due to burnup by performing SR 3.2.3.4. Alternatively, linear interpolation between the most recent measurement of the target flux differences and a predicted end of cycle value provides a reasonable update.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.2.3.4

Measurement of the target flux difference is accomplished by taking a flux map when the core is at equilibrium xenon conditions, preferably at high power levels with the control banks nearly withdrawn. This flux map provides the equilibrium xenon axial power distribution from which the target value can be determined. The target flux difference varies slowly with core burnup.

A Frequency of 31 EFPD after each refueling and 92 EFPD thereafter for remeasuring the target flux differences adjusts the target flux difference for each excore channel to the value measured at steady state conditions. This is the basis for the CAOC. Remeasurement at this Surveillance interval also establishes the AFD target flux difference values that account for changes in incore excore calibrations that may have occurred in the interim.

A Note modifies this SR to allow the predicted end of cycle AFD from the cycle nuclear design to be used to determine the initial target flux difference after each refueling.

REFERENCES

1. FSAR, Chapter 7.

B 3.2 POWER DISTRIBUTION LIMITS

B 3.2.4 QUADRANT POWER TILT RATIO (QPTR)

BASES

BACKGROUND

The QPTR limit ensures that the gross radial power distribution remains consistent with the design values used in the safety analyses. Precise radial power distribution measurements are made after refueling, and periodically during power operation.

The power density at any point in the core must be limited so that the fuel design criteria are maintained. Together, LCO 3.2.3, "AXIAL FLUX DIFFERENCE (AFD)," LCO 3.2.4, and LCO 3.1.6, "Control Bank Insertion Limits," provide limits on process variables that characterize and control the three dimensional power distribution of the reactor core. Control of these variables ensures that the core operates within the fuel design criteria and that the power distribution remains within the bounds used in the safety analyses.

APPLICABLE SAFETY ANALYSES

This LCO precludes core power distributions that violate the following fuel design criteria:

a. During a large break loss of coolant accident, the peak cladding temperature must not exceed 2200°F (Ref. 1);

b. During a loss of forced reactor coolant flow accident, there must be at least 95% probability at the 95% confidence level (the 95/95 departure from nucleate boiling (DNB) criterion) that the hot fuel rod in the core does not experience a DNB condition (Ref. 2);

c. During an ejected rod accident, the energy deposition to the fuel must not exceed 225 calories/gram for non-irradiated fuel and 200 calories/gram for irradiated fuel (Ref. 3); and

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

d. The control rods must be capable of shutting down the reactor with a minimum required SDM with the highest worth control rod stuck fully withdrawn (Ref. 4).

The LCO limits on the AFD, the QPTR, the Heat Flux Hot Channel Factor ($F_Q(Z)$), the Nuclear Enthalpy Rise Hot Channel Factor ($F^N_{\Delta H}$), and control bank insertion are established to preclude core power distributions that exceed the safety analyses limits.

The QPTR limits ensure that $F^N_{\Delta H}$ and $F_Q(Z)$ remain below their limiting values by preventing an undetected change in the gross radial power distribution.

In MODE 1, the $F^N_{\Delta H}$ and $F_Q(Z)$ limits must be maintained to preclude core power distributions from exceeding design limits assumed in the safety analyses.

The QPTR satisfies Criterion 2 of 10 CFR 50.36.

LCO

The QPTR limit of 1.02, at which corrective action is required, provides a margin of protection for both the DNB ratio and linear heat generation rate contributing to excessive power peaks resulting from X-Y plane power tilts. A limiting QPTR of 1.02 can be tolerated before the margin for uncertainty in $F_Q(Z)$ and ($F^N_{\Delta H}$) is possibly challenged.

APPLICABILITY

The QPTR limit must be maintained in MODE 1 with THERMAL POWER > 50% RTP to prevent core power distributions from exceeding the design limits.

Applicability in MODE 1 ≤ 50% RTP and in other MODES is not required because there is either insufficient stored energy in the fuel or insufficient energy being transferred to the reactor coolant to require the implementation of a QPTR limit on the distribution of core power. The QPTR limit in these conditions is, therefore, not important. Note that the $F^N_{\Delta H}$ and $F_Q(Z)$ LCOs still apply, but allow progressively higher peaking factors at 50% RTP or lower.

(continued)

BASES (continued)

ACTIONS

A.1

With the QPTR exceeding its limit, a power level reduction of 3% RTP for each 1% by which the QPTR exceeds 1.00 is a conservative tradeoff of total core power with peak linear power. The Completion Time of 2 hours allows sufficient time to identify the cause and correct the tilt. Note that the power reduction itself may cause a change in the tilted condition. The maximum allowable power level initially determined by Required Action A.1 may be affected by subsequent determinations of QPTR. Increases in QPTR would require power reduction within 2 hours of the QPTR determination, if necessary, to comply with the decreases in maximum allowable power level. Decreases in QPTR would allow increasing the maximum allowable power level and increasing power up to this revised limit.

A.2

After completion of Required Action A.1, the QPTR may still exceed the specified limit. As such, any additional changes in the QPTR are detected by requiring a check of the QPTR once per 12 hours thereafter. A 12 hour Completion Time is sufficient because any additional change in QPTR would be relatively slow.

A.3

The peaking factors $F^N_{\Delta H}$ and $F_Q(Z)$ are of primary importance in ensuring that the power distribution remains consistent with the initial conditions used in the safety analyses. Performing SRs on $F^N_{\Delta H}$ and $F_Q(Z)$ within the Completion Time of 24 hours after achieving equilibrium conditions from a Thermal Power reduction per Required Action A.1 ensures that these primary indicators of power distribution are within their respective limits. Equilibrium conditions are achieved when the core is sufficiently stable at intended operating conditions to support flux mapping. A Completion Time of 24 hours after achieving equilibrium conditions from a Thermal Power reduction per Required Action A.1 takes into consideration the rate at which peaking factors are likely to change, and the time required to stabilize the plant and perform a flux map.

(continued)

BASES

ACTIONS

A.3 (continued)

If these peaking factors are not within their limits, the Required Actions of these Surveillances provide an appropriate response for the abnormal condition. If the QPTR remains above its specified limit, the peaking factor surveillances are required each 7 days thereafter to evaluate $F^N_{\Delta H}$ and $F_Q(Z)$ with changes in power distribution. Relatively small changes are expected due to either burnup and xenon redistribution or correction of the cause for exceeding the QPTR limit.

A.4

Although $F^N_{\Delta H}$ and $F_Q(Z)$ are of primary importance as initial conditions in the safety analyses, other changes in the power distribution may occur as the QPTR limit is exceeded and may have an impact on the validity of the safety analysis. A change in the power distribution can affect such reactor parameters as bank worths and peaking factors for rod malfunction accidents. When the QPTR exceeds its limit, it does not necessarily mean a safety concern exists. It does mean that there is an indication of a change in the gross radial power distribution that requires an investigation and evaluation that is accomplished by examining the incore power distribution. Specifically, the core peaking factors and the quadrant tilt must be evaluated because they are the factors that best characterize the core power distribution. This re-evaluation is required to ensure that, before increasing THERMAL POWER to above the limit of Required Action A.1, the reactor core conditions are consistent with the assumptions in the safety analyses.

A.5

If the QPTR has exceeded the 1.02 limit and a re-evaluation of the safety analysis is completed and shows that safety requirements are met, the excore detectors are normalized to restore QPTR to within limits prior to increasing THERMAL POWER to above the limit of Required Action A.1. Normalization is accomplished in such a manner that the indicated QPTR following normalization is near 1.00. This is done to detect any subsequent significant changes in QPTR.

(continued)

BASES

ACTIONS

A.5 (continued)

Required Action A.5 is modified by two Notes. Note 1 states that the QPT is not restored to within limits until after the re-evaluation of the safety analysis has determined that core conditions at RTP are within the safety analysis assumptions (i.e., Required Action A.4). Note 2 states that if Required Action A.5 is performed, then Required Action A.6 shall be performed. Required Action A.5 normalizes the excore detectors to restore QPTR to within limits, which restores compliance with LCO 3.2.4. Thus, Note 2 prevents exiting the Actions prior to completing flux mapping to verify peaking factors, per Required Action A.6. These Notes are intended to prevent any ambiguity about the required sequence of actions.

A.6

Once the flux tilt is restored to within limits (i.e., Required Action A.5 is performed), it is acceptable to return to full power operation. However, as an added check that the core power distribution is consistent with the safety analysis assumptions, Required Action A.6 requires verification that $F_Q(Z)$ and $F^N_{\Delta H}$ are within their specified limits within 24 hours of achieving equilibrium conditions at RTP. As an added precaution, if the core power does not reach equilibrium conditions at RTP within 24 hours, but is increased slowly, then the peaking factor surveillances must be performed within 48 hours after increasing THERMAL POWER above the limit of Required Action A.1. These Completion Times are intended to allow adequate time to increase THERMAL POWER to above the limit of Required Action A.1, while not permitting the core to remain with unconfirmed power distributions for extended periods of time.

Required Action A.6 is modified by a Note that states that the peaking factor surveillances may only be done after the excore detectors have been normalized to restore QPTR to within limits (i.e., Required Action A.5). The intent of this Note is to have the peaking factor surveillances performed at operating power levels, which can only be accomplished after the excore detectors are normalized to restore QPTR to within limits and the core returned to power.

(continued)

BASES

ACTIONS (continued)

B.1

If Required Actions A.1 through A.6 are not completed within their associated Completion Times, the unit must be brought to a MODE or condition in which the requirements do not apply. To achieve this status, THERMAL POWER must be reduced to < 50% RTP within 4 hours. The allowed Completion Time of 4 hours is reasonable, based on operating experience regarding the amount of time required to reach the reduced power level without challenging plant systems.

SURVEILLANCE REQUIREMENTS

SR 3.2.4.1

SR 3.2.4.1 is modified by two Notes. Note 1 allows QPTR to be calculated with three power range channels if THERMAL POWER is ≤ 75% RTP and the input from one Power Range Neutron Flux channel is inoperable. Note 2 allows performance of SR 3.2.4.2 in lieu of SR 3.2.4.1.

This Surveillance verifies that the QPTR, as indicated by the Nuclear Instrumentation System (NIS) excore channels, is within its limits. The Frequency of 7 days takes into account other indications and alarms available to the operator in the control room. For those causes of QPT that occur quickly (e.g., a dropped rod), there typically are other indications of abnormality that prompt a verification of core power tilt.

SR 3.2.4.2

This Surveillance is modified by a Note, which states that it is not required until 24 hours after the input from one or more Power Range Neutron Flux channels are inoperable and the THERMAL POWER is > 75% RTP.

With an NIS power range channel inoperable, tilt monitoring for a portion of the reactor core becomes degraded.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.2.4.2 (continued)

Large tilts are likely detected with the remaining channels, but the capability for detection of small power tilts in some quadrants is decreased. Performing SR 3.2.4.2 at a Frequency of 24 hours provides an accurate alternative means for ensuring that any tilt remains within its limits.

For purposes of monitoring the QPTR when one power range channel is inoperable, the moveable incore detectors are used to confirm that the normalized symmetric power distribution is consistent with the indicated QPTR and any previous data indicating a tilt. The incore detector monitoring is performed with a full incore flux map or two sets of four thimble locations with quarter core symmetry. The two sets of four symmetric thimbles is a set of eight unique detector locations.

The symmetric thimble flux map can be used to measure symmetric thimble "tilt." This can be compared to a reference symmetric thimble tilt, from the most recent full core flux map, to generate an incore QPTR. Therefore, incore monitoring of QPTR can be used to confirm that QPTR is within limits.

With one NIS channel inoperable, the indicated tilt may be changed from the value indicated with all four channels OPERABLE. To confirm that no change in tilt has actually occurred, which might cause the QPTR limit to be exceeded, the incore result may be compared against previous flux maps either using the symmetric thimbles as described above or a complete flux map.

REFERENCES

1. 10 CFR 50.46.

2. FSAR Section 14.1.6.

3. FSAR Section 14.2.6.

4. FSAR Section 3.1.

B 3.3 INSTRUMENTATION

B 3.3.1 Reactor Protection System (RPS) Instrumentation

BASES

BACKGROUND

The RPS 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 RPS, as well as specifying LCOs on other reactor system parameters and equipment performance.

The LSSS, defined in this specification as the Allowable Value, in conjunction with the LCOs, establish the threshold for protective system action to prevent exceeding acceptable limits during Design Basis Accidents (DBAs).

During AOOs, which are those events expected to occur one or more times during the unit life, the acceptable limits are:

1. The Departure from Nucleate Boiling Ratio (DNBR) shall be maintained above the Safety Limit (SL) value 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 dose will be within the 10 CFR 50 and 10 CFR 100 criteria during AOOs.

(continued)

BASES

BACKGROUND (continued)

Accidents are events that are analyzed even though they are not expected to occur during the unit life. The 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 RPS instrumentation is segmented into four distinct but interconnected modules as described in FSAR, Chapter 7 (Ref. 1), 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. Signal Process Control and Protection System including Analog Protection System, Nuclear Instrumentation System (NIS), field contacts, and protection channels: provides signal conditioning, bistable setpoint comparison, process algorithm actuation, compatible electrical signal output to protection system devices, and control board/control room/miscellaneous indications;

3. RPS automatic initiation relay logic, including input, logic, and output: initiates proper unit shutdown in accordance with the defined logic, which is based on the bistable outputs from the signal process control and protection system; and

4. Reactor trip switchgear, including reactor trip breakers (RTBs) 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.

(continued)

BASES

BACKGROUND (continued)

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 Allowable Values. The OPERABILITY of each transmitter or sensor can be evaluated when its "as found" calibration data are compared against its documented Allowable Value.

Signal Process Control and Protection System

Generally, three or four channels of process control equipment are used for the signal processing of unit parameters measured by the field instruments. The process control equipment provides signal conditioning, comparable output signals for instruments located on the main control board, and comparison of measured input signals with setpoints established to ensure that actuation will occur within the limits assumed in the accident analyses (Ref. 3). If the measured value of a unit parameter exceeds the predetermined setpoint, an output from a bistable is forwarded to the RPS relay logic. Channel separation is maintained up to and through the actuation logic. However, not all unit parameters require four channels of sensor measurement and signal processing. Some unit parameters provide input only to the RPS relay logic, while others provide input to the RPS relay logic, the main control board, the unit computer, and 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 is still OPERABLE 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 is still OPERABLE with a one-out-of-two logic.

Generally, if a parameter is used for input to the RPS relay logic and a control function, four channels with a

(continued)

BASES

BACKGROUND (continued)

two-out-of-four logic are sufficient to provide the required reliability and redundancy. 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. Again, a single failure will neither cause nor prevent the protection function actuation. These requirements are described in IEEE-279-1968 (Ref. 4). The actual number of channels required for each unit parameter is specified in Reference 1 and discussed later in these Technical Specification Bases.

Two logic channels are required to ensure no single random failure of a logic channel will disable the RPS. The logic channels are designed such that testing required while the reactor is at power may be accomplished without causing trip.

Trip Setpoints and Allowable Values

The following describes the relationship between the safety limit, analytical limit, allowable value and channel component calibration acceptance criteria:

a. A Safety Limit (SL) is a limit on the combination of THERMAL POWER, RCS highest loop average temperature, and RCS pressure needed to protect the integrity of physical barriers that guard against the uncontrolled release of radioactivity (i.e., fuel, fuel cladding, RCS pressure boundary and containment). The safety limits are identified in Technical Specification 2.0, Safety Limits (SLs).

b. An Analytical Limit (AL) is the trip actuation point used as an input to the accident analyses presented in FSAR, Chapter 14 (Ref. 3). Analytical limits are developed from event analyses models which consider parameters such as process delays, rod insertion times, reactivity changes, instrument response times, etc. An analytical limit for a trip actuation point is established at a point that will ensure that a Safety Limit (SL) is not exceeded.

(continued)

BASES

BACKGROUND (continued)

c. An Allowable Value (AV) is the limiting actuation point for the entire channel of a trip function that will ensure, within the required level of confidence, that sufficient allocation exists between this actual trip function actuation point and the analytical limit. The Allowable Value is more conservative than the Analytical Limit to account for instrument uncertainties that either are not present or are not measured during periodic testing. Channel uncertainties that either are not present or are not measured during periodic testing may include design basis accident temperature and radiation effects (Ref. 5) or process dependent effects. The channel allowable value for each RPS function is controlled by Technical Specifications and is listed in Table 3.3.1-1, Reactor Protection System Instrumentation.

d. Calibration acceptance criteria are established by plant administrative programs for the components of a channel (i.e., required sensor, alarm, interlock, display, and trip function). The calibration acceptance criteria are established to ensure, within the required level of confidence, that the Allowable Value for the entire channel will not be exceeded during the calibration interval.

A description of the methodology used to calculate the channel allowable values and calibration acceptance criteria is provided in References 6 and 8.

Setpoints in accordance with the Allowable Value ensure that SLs 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 channel of the relay logic protection system can be tested on line to verify that the signal or setpoint accuracy is within the specified allowance requirements of calculations performed in accordance with Reference 6 that are based on analytical limits consistent with Reference 3. Once a designated channel is taken out of service for testing, a simulated signal is injected in place of the field instrument signal.

(continued)

BASES

BACKGROUND (continued)

The process equipment for the channel in test is then tested, verified, and calibrated. SRs for the channels are specified in the SRs section. The Allowable Values listed in Table 3.3.1-1 and the Trip Setpoints calculated to ensure that Allowable Values are not exceeded during the calibration interval are based on the methodology described in Reference 6, which incorporates all of the known uncertainties applicable for each channel. All field sensors and signal processing equipment for these channels are assumed to operate within the allowances of these uncertainty magnitudes.

Relay Logic Protection System

Relay logic is used for the decision logic processing of outputs from the signal processing equipment 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 and/or ESF actuation 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 cabinet for physical and electrical separation to satisfy separation and independence requirements. The system has been designed to trip in the event of a loss of power, directing the unit to a safe shutdown condition.

The relay logic performs the decision logic for actuating a reactor trip or ESF actuation, generates the electrical output signal that will initiate the required trip or actuation, and provides the status, permissive, and annunciator output signals to the control room.

The bistable outputs from the signal processing equipment are sensed by the relay logic equipment and 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 or send actuation signals via master and slave relays to 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.

(continued)

BASES

BACKGROUND (continued)

Reactor Trip Breakers

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 the reactor protection system is a voltage signal that energizes the undervoltage coils in the RTBs and bypass breakers, if in use. When the required logic matrix combination is completed, the reactor protection system output voltage signal is removed, 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 reactor protection system. Either the undervoltage coil or the shunt trip mechanism is sufficient by itself, thus providing a diverse trip mechanism.

There are two reactor trip breakers in series so that opening either will interrupt power to the control rod drive mechanisms (CRDMs) and allow the rod cluster control assemblies (RCCAs), or "rods," to fall into the core and shut down the reactor. Each reactor trip breaker has a parallel reactor trip bypass breaker that is normally open. This feature allows testing of the reactor trip breakers at power. A trip signal from RPS logic train A will trip reactor trip breaker A and reactor trip bypass breaker B; and, a trip signal from logic train B will trip reactor trip breaker B and reactor trip bypass breaker A. During normal operation, both reactor trip breakers are closed and both reactor trip bypass breakers are open. An interlock trips both reactor trip bypass breakers if an attempt is made to close a reactor trip bypass breaker when the other reactor trip bypass breaker is already closed.

A trip breaker train consists of both the reactor trip breaker and reactor trip bypass breaker associated with a single RPS logic train if the breaker is racked in, closed, and capable of

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BASES

BACKGROUND (continued)

supplying power to the CRD System. Thus, the train consists of the main breaker; or, the main breaker and bypass breaker associated with this same RPS logic train if both the breaker and bypass are racked in, closed, and capable of supplying power to the CRD System.

The RPS decision logic Functions are described in the functional diagrams included in Reference 2. In addition to the reactor protection and ESFAS trips, the various "permissive interlocks" that are associated with unit conditions are also described.

When any one RPS 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 RPS functions to maintain the Safety Limits (SLs) during all Abnormal Operating Occurrences (AOOs) and mitigates the consequences of DBAs in all MODES in which the Rod Control system is capable of rod withdrawal and one or more rods not fully inserted.

Each of the analyzed accidents and transients can be detected by one or more RPS Functions. The accident analysis described in Reference 3 takes credit for most RPS trip Functions. RPS trip Functions not specifically credited in the accident analysis are qualitatively credited in the safety analysis and the NRC staff approved licensing basis. These RPS trip Functions may provide protection for conditions that do not require dynamic transient analysis to demonstrate Function performance. They may also serve as backups to RPS trip Functions that were credited in the accident analysis.

The LCO requires all instrumentation performing an RPS Function, listed in Table 3.3.1-1 in the accompanying LCO, to be OPERABLE. Failure of any instrument renders the affected channel(s) inoperable and reduces the reliability of the affected Functions.

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BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

The LCO generally requires OPERABILITY of four or three channels in each instrumentation Function, two channels of Manual Reactor Trip, and two trains in each Automatic Trip Logic Function. Generally, four OPERABLE instrumentation channels in a two-out-of-four configuration are required when one RPS channel is also used as a control system input. Isolation amplifiers prevent a control system failure from affecting the protection system (Ref. 1). This configuration accounts for the possibility of the shared channel failing in such a manner that it creates a transient that requires RPS action. In this case, the RPS 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 RPS trip and disable one RPS 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.

Reactor Protection System Functions

The safety analyses and OPERABILITY requirements applicable to each RPS 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 push buttons 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 push button. Each channel activates the reactor trip

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

breaker 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 initiation of a 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 initiation 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 the control rods. In this condition, inadvertent control rod withdrawal is possible. In MODE 3, 4, or 5, manual initiation of a 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, neither the shutdown rods nor the control rods are permitted to be withdrawn and the CRDMs are disconnected from the control rods and shutdown rods. Therefore, the manual initiation Function is not required.

2. Power Range Neutron Flux

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 Rod Control System and Turbine Control System. Four channels of NIS are required because 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 three 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.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

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. These channels are considered OPERABLE during required Surveillance tests that require insertion of a test signal if the channel remains untripped and capable of tripping due to an increasing neutron flux signal. During MODE 2 Physics Tests, only 3 channels are required because the output from one detector is used for test instrumentation.

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 detectors cannot detect 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 and reactivity excursions into the power range are extremely unlikely. Other RPS Functions and administrative controls provide protection against reactivity additions when in MODE 3, 4, 5, or 6.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

The Power Range Neutron Flux-High Allowable Value and Trip Setpoint are in accordance with Consolidated Edison Company of New York, Inc. Indian Point Nuclear Generating Station Unit No. 3 Plant Manual Volume VI: Precautions, Limitations, and Setpoints, March 1975 (Ref. 8).

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. During MODE 2 Physics Tests, only 3 channels are required because the output from one detector is used for test instrumentation.

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 approximately 10% RTP (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 detectors cannot detect neutron levels in this

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

range. Other RPS trip Functions and administrative controls provide protection against positive reactivity additions or power excursions in MODE 3, 4, 5, or 6.

The Power Range Neutron Flux-Low Allowable Value and Trip Setpoint are in accordance with Consolidated Edison Company of New York, Inc. Indian Point Nuclear Generating Station Unit No. 3 Plant Manual Volume VI: Precautions, Limitations, and Setpoints, March 1975 (Ref. 8).

3. Intermediate Range Neutron Flux

The Intermediate Range Neutron Flux trip Function ensures that protection is provided against an uncontrolled RCCA bank rod withdrawal accident from a subcritical condition during startup. This trip Function provides redundant protection to the Power Range Neutron Flux – Low Setpoint trip Function. Therefore, only one of the two channels of Intermediate Range Neutron Flux is Required to be OPERABLE in the Applicable MODES. Either of the two channels can be used to satisfy this requirement. The NIS intermediate range detectors are located external to the reactor vessel and measure neutrons leaking from the core. The NIS intermediate range detectors do not provide any input to control systems. 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.

The LCO requires one channel of Intermediate Range Neutron Flux to be OPERABLE. One OPERABLE channel is sufficient to provide redundant protection to the Power Range Neutron Flux – Low Setpoint trip Function.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

Table 3.3.1-1 identifies the Technical Specification Allowable Value for this trip function as not applicable (NA) because LCO 3.3.1, Function 2.b, Power Range Neutron Flux-Low, is used to bound the analysis for an uncontrolled control rod assembly withdrawal from a subcritical condition. The surveillance acceptance criterion used for this function is ≤28% RTP. This value was established based on Indian Point Nuclear Generating Station Unit No. 3 Plant Manual Volume VI: Precautions, Limitations, and Setpoints, March 1975, (Ref. 8).

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.

The Intermediate Range Neutron Flux trip must be OPERABLE 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 accident during reactor startup. Above the P-10 setpoint, the Power Range Neutron Flux – High Setpoint trip provides core protection for a rod withdrawal accident. In MODE 2, below the P-6 setpoint, the source Range Neutron Flux Trip provides backup core protection for reactivity accidents. In MODE 3, 4, or 5, the Intermediate Range Neutron Flux trip does not have to be OPERABLE because the control rods must be fully inserted and only the shutdown rods may be withdrawn. The reactor cannot be started up in this condition. The core also has the required SDM to mitigate the consequences of a positive reactivity addition accident. In MODE 6, all rods are fully inserted and the core has a required increased SDM. Also, the NIS intermediate range detectors cannot detect neutron levels present in this MODE.

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BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

4. Source Range Neutron Flux

The LCO requirement for the Source Range Neutron Flux trip Function ensures that protection is provided against an uncontrolled RCCA bank rod withdrawal accident from a subcritical condition during startup. This trip Function provides redundant protection to the Power Range Neutron Flux-Low trip Function. Therefore, only one of the two channels of Source Range Neutron Flux is Required to be OPERABLE in the Applicable MODES. Either of the two channels can be used to satisfy this requirement. In MODES 3, 4, and 5, administrative controls also prevent the uncontrolled withdrawal of rods. 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 RPS 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.

The LCO requires one channel of Source Range Neutron Flux to be OPERABLE. One OPERABLE channel is sufficient to provide redundant protection to the Power Range Neutron Flux-Low Setpoint trip Function.

Table 3.3.1-1 identifies the Technical Specification Allowable Value for this trip function as not applicable (NA) because LCO 3.3.1, Function 2.b, Power Range Neutron Flux-Low, is used to bound the analysis for an uncontrolled control rod assembly withdrawal from a subcritical condition. The surveillance acceptance criterion used for this function is ≤6.0 E+5 counts per second.

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BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

The Source Range Neutron Flux Function provides protection for control rod withdrawal from subcritical. The Function also provides visual neutron flux indication in the control room.

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 withdrawal accident, the Source Range Neutron Flux trip must be OPERABLE. 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 accidents. 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 of this function to the RPS logic are not required to be OPERABLE. The requirements for the NIS source range detectors in MODE 6 are addressed in LCO 3.9.2, "Nuclear Instrumentation."

5. Overtemperature ΔT

The Overtemperature ΔT trip Function is provided to ensure that the design limit DNBR is met. This trip Function also limits the range over which the Overpower ΔT trip Function must provide protection. The inputs to the Overtemperature ΔT trip include 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;

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BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

- pressurizer pressure – the Trip Setpoint is varied to correct for changes in system pressure; and

- axial power distribution – f(ΔI), 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 Technical Specification limit, as indicated by the difference between the upper and lower NIS power range detectors, the Trip Setpoint is reduced in accordance with Note 1 of Table 3.3.1-1.

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 loop as described in Note 1 of Table 3.3.1-1. Trip occurs if Overtemperature ΔT is indicated in two loops. The

pressure and temperature signals are used for other control functions. Therefore, the actuation logic is designed 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 RPS Functions. Failures that affect multiple Functions require entry into the Conditions applicable to all affected Functions.

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BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

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.

6. 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 limits the required range of the Overtemperature ΔT trip Function and 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; and

- rate of change of reactor coolant average temperature – including a constant determined by dynamic considerations that provides compensation for the delays between the core and the temperature measurement system.

The Overpower ΔT trip Function is calculated for each loop as per Note 2 of Table 3.3.1-1. Trip occurs if Overpower ΔT is indicated in two loops. The temperature signals are used for other control functions. Therefore, the actuation logic is designed 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.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

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 RPS 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.

7. Pressurizer Pressure

The same sensors provide input to the Pressurizer Pressure-High and -Low trips and the Overtemperature ΔT trip. The Pressurizer Pressure channels are also used to provide input to the Pressurizer Pressure Control System. Therefore, the actuation logic is designed 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 the plant design and this LCO require 4 channels for the Pressurizer Pressure-Low trips but requires only 3 channels of Pressurizer Pressure-High. This difference recognizes the role of pressurizer code safety valves in response to a high pressure condition.

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BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

a. Pressurizer Pressure-Low

The Pressurizer Pressure-Low trip Function ensures that protection is provided against violating the DNBR limit due to low pressure.

The LCO requires four channels of Pressurizer Pressure-Low to be OPERABLE.

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 P-10 or turbine first stage pressure greater than approximately 10% of full power equivalent). On decreasing power, this trip Function is automatically blocked below P-7. Below the P-7 setpoint, no conceivable power distributions can occur that would cause DNB concerns.

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.

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.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

In MODE 1 or 2, the Pressurizer Pressure - High trip must be OPERABLE to help prevent RCS overpressurization and minimize challenges to the 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 RCS temperature is less than the LTOP arming temperature specified in LCO 3.4.12, Low Temperature Overpressure Protection (LTOP).

8. 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. A fourth channel is not required to address control/ protection interaction concerns because 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 level channel failure cannot cause the safety valve to lift before reactor high pressure trip.

In MODE 1, when there is a potential for overfilling the pressurizer, the Pressurizer Water Level - High trip must be OPERABLE. This trip Function is automatically enabled on increasing power by the P-7 interlock.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

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.

9. Reactor Coolant Flow-Low

a. Reactor Coolant Flow-Low (Single Loop)

The Reactor Coolant Flow – Low (Single Loop) 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 trips due to normal variations in loop flow. Above the P-8 setpoint, a loss of flow in any RCS loop will actuate a reactor trip. Each RCS loop has three flow detectors to monitor flow. The flow signals are not used for any control system input.

The LCO requires three Reactor Coolant Flow – Low channels per RCS loop to be OPERABLE in MODE 1 above P-8. Each reactor coolant loop is considered to be a separate function. Therefore, separate condition entry is allowed for each loop.

In MODE 1 above the P-8 setpoint, a loss of flow in one RCS loop could result in DNB conditions in the core. In MODE 1 below the P-8 setpoint, a loss of flow in two or more loops is required to actuate a reactor trip (Function 9.b) because of the lower power level and the greater margin to the design limit DNBR.

b. Reactor Coolant Flow-Low (Two Loops)

The Reactor Coolant Flow – Low (Two Loops) trip Function ensures that protection is provided against

(continued)

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

violating the DNBR limit due to low flow in two or more RCS loops while avoiding reactor trips due to normal variations in loop flow.

Above the P-7 setpoint and below the P-8 setpoint, a loss of flow in two or more loops will initiate a reactor trip. Each loop has three flow detectors to 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. Each reactor coolant loop is considered to be a separate function. Therefore, separate condition entry is allowed for each loop.

In MODE 1 above the P-7 setpoint and below the P-8 setpoint, the Reactor Coolant Flow - Low (Two Loops) trip must be OPERABLE. Below the P-7 setpoint, all reactor trips on low flow are automatically blocked since no conceivable power distributions could occur that would cause a DNB concern at this low power level. Above the P-7 setpoint, the reactor trip on low flow in two or more RCS loops is automatically enabled. Above the P-8 setpoint, a loss of flow in any one loop (Function 9.a) will actuate a reactor trip because of the higher power level and the reduced margin to the design limit DNBR.

10. Reactor Coolant Pump (RCP) Breaker Position

Both RCP Breaker Position trip Functions operate to anticipate the Reactor Coolant Flow - Low trips to avoid RCS heatup that would occur before the low flow trip actuates.

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BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

a. Reactor Coolant Pump Breaker Position (Single Loop)

The RCP Breaker Position (Single Loop) trip Function ensures that protection is provided against violating the DNBR limit due to a loss of flow in one RCS loop. The position of each RCP breaker is monitored. If one RCP breaker is open above the P-8 setpoint, a reactor trip is initiated. This trip Function will generate a reactor trip before the Reactor Coolant Flow-Low (Single Loop) Trip Setpoint is reached.

The LCO requires one RCP Breaker Position 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 unit SLs for loss of flow events. The RCP Breaker Position trip serves only to anticipate the low flow trip, minimizing the thermal transient associated with loss of a pump. Each reactor coolant loop is considered to be a separate function. Therefore, separate condition entry is allowed for each loop.

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

In MODE 1 above the P-8 setpoint, when a loss of flow in any RCS loop could result in DNB conditions in the core, the RCP Breaker Position (Single Loop) trip must be OPERABLE. In MODE 1 below the P-8 setpoint, a loss of flow in two or more loops (Function 10.b) is required to actuate a reactor trip because of the lower power level and the greater margin to the design limit DNBR.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

b. Reactor Coolant Pump Breaker Position (Two Loops)

The RCP Breaker Position (Two Loops) trip Function ensures that protection is provided against violating the DNBR limit due to a loss of flow in two or more RCS loops. The position of each RCP breaker is monitored. Above the P-7 setpoint a loss of flow in two or more loops will initiate a reactor trip. This trip Function will generate a reactor trip before the Reactor Coolant Flow-Low (Two Loops) Trip Setpoint is reached.

The LCO requires one RCP Breaker Position channel per RCP to be OPERABLE. One OPERABLE channel is sufficient for this Function because the RCS Flow-Low trip alone provides sufficient protection of unit SLs for loss of flow events. The RCP Breaker Position trip serves only to anticipate the low flow trip, minimizing the thermal transient associated with loss of an RCP. Each reactor coolant loop is considered to be a separate function. Therefore, separate condition entry is allowed for each loop.

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

In MODE 1 above the P-7 setpoint and below the P-8 setpoint, the RCP Breaker Position (Two Loops) trip must be OPERABLE. Below the P-7 setpoint, all reactor trips on loss of flow are automatically blocked since no conceivable power distributions could occur that would cause a DNB concern at this low power level. Above the P-7 setpoint, the reactor trip on loss of flow in two RCS loops is automatically enabled. Above the P-8 setpoint, a loss of flow in any one loop (Function 10.a) will actuate a reactor trip because of the higher power level and the reduced margin to the design limit DNBR.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

11. Undervoltage Reactor Coolant Pumps (6.9 kV Bus)

The Undervoltage RCPs direct reactor trip Function ensures that protection is provided against violating the DNBR limit due to a loss of flow in two or more RCS loops. The voltage to each 6.9 kV bus used to power an RCP is monitored. Above the P-7 setpoint, a loss of voltage detected on two or more RCP buses will initiate a direct reactor trip. This trip Function will generate a reactor trip before the Reactor Coolant Flow – Low (Two Loops) Trip Setpoint is reached. Time delays are incorporated into the Undervoltage RCPs channels associated with the direct reactor trip and are provided to prevent reactor trips due to momentary electrical power transients.

The LCO requires one Undervoltage RCPs channel per bus to be OPERABLE. The Allowable Value for this trip function is shown as NA because there is no Analytical Limit for RCP Undervoltage. The RCPs will continue to operate and deliver required RCS flow during an Undervoltage Condition. The reactor trip on RCP Undervoltage is a time-zero initiating event assumed in the safety analysis (Reference 3). The UV relay is adjusted for a nominal trip setpoint of 75% of the 6900 Vac bus voltage and the surveillance acceptance criterion used for this function is ≥70%.

In MODE 1 above the P-7 setpoint, the Undervoltage RCP trip must be OPERABLE. Below the P-7 setpoint, all reactor trips on loss of flow are automatically blocked since no conceivable power distributions could occur that would cause a DNB concern at this low power level. Above the P-7 setpoint, the reactor trip on loss of flow in two or more RCS loops is automatically enabled.

12. Underfrequency Reactor Coolant Pumps

The Underfrequency RCPs reactor trip Function ensures that protection is provided against violating the DNBR limit due to

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

a loss of flow in two or more 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 two or more RCP buses trips all four RCPs, a condition that will initiate a reactor trip. This trip Function will generate a reactor trip before the Reactor Coolant Flow – Low (Two Loops) Trip Setpoint is reached.

The LCO requires one Underfrequency RCP channel per bus to be OPERABLE.

In Mode 1 above the P-7 Setpoint, the Underfrequency RCP's trip must be OPERABLE. Below the P-7 Setpoint, all reactor trips on loss off flow are automatically blocked since no conceivable power distribution could occur that would cause a DNB Concern at this low power level. Above the P-7 Setpoint, the reactor trip on loss of flow in two or more RCS loops is automatically enabled.

13. Steam Generator Water Level-Low Low

The SG Water Level – Low Low trip Function ensures that protection is provided against a loss of heat sink and actuates the 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 any SG is indicative of a loss of heat sink for the reactor. The "B" channel level transmitters provide input to the SG Level 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. This Function also performs the ESFAS function of starting the AFW pumps on low low SG level.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

The LCO requires three channels of SG Water Level – Low Low per SG to be OPERABLE. Each SG is considered to be a separate function. Therefore, separate condition entry is allowed for each SG.

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

14. Steam Generator Water Level-Low, Coincident With Steam Flow/Feedwater Flow Mismatch

SG Water Level – Low, in conjunction with the Steam Flow/ Feedwater Flow Mismatch, ensures that protection is provided against a loss of heat sink and actuates the AFW System. In addition to a decreasing water level in the SG, the difference between feedwater flow and steam flow is evaluated to determine if feedwater flow is significantly less than steam flow. With less feedwater flow than steam flow, SG level will decrease at a rate dependent upon the magnitude of the difference in flow rates. The required logic is developed from two SG level channels and two Steam Flow/Feedwater Flow Mismatch channels per SG. One narrow range level channel coincident with the associated Steam Flow/Feedwater Flow Mismatch channel for the same SG (steam flow greater than feed flow) will actuate a reactor trip.

The LCO requires two channels of SG Water Level – Low coincident with Steam Flow/Feedwater Flow Mismatch.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

Each SG is considered to be a separate function. Therefore, separate condition entry is allowed for each SG.

Table 3.3.1-1 identifies the Technical Specification Allowable Value for this trip function as not applicable (NA) because LCO 3.3.1, Function 13, Steam Generator Water Level-Low Low, is used to bound the analysis for a loss of feedwater event. The allowable values required for OPERABILITY of Function 13 is ≥ 4.0%. The surveillance acceptance criteria used for Function 14 are ≥7.5% narrow range level and ≤1.33E+6 pounds per hour steam flow/feedwater flow mismatch.

In MODE 1 or 2, when the reactor requires a heat sink, the SG Water Level – Low coincident with Steam Flow/Feedwater Flow Mismatch trip must be OPERABLE. The normal source of water for the SGs is the MFW System (not safety related). 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 coincident with Steam Flow/Feedwater Flow Mismatch Function does not have to be OPERABLE because the MFW System is not in operation and the reactor is not critical. Decay heat removal is accomplished by the AFW System in MODE 3 and 4 and by the RHR System in MODE 4, 5, or 6. The MFW System is in operation only in MODE 1 or 2 and, therefore, this trip Function need only be OPERABLE in these MODES.

15. Turbine Trip – Low Auto-Stop Oil Pressure

The Turbine Trip – Low Auto-Stop 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

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

level below the P-8 setpoint will not actuate a reactor trip. Three pressure switches monitor the control oil pressure in the Turbine Control System. A low pressure 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 Auto-Stop Oil Pressure to be OPERABLE in MODE 1 above P-8.

Below the P-8 setpoint, a turbine trip does not actuate a reactor trip. In MODE 1 (below P-8 setpoint), 2, 3, 4, 5, or 6, there is no potential for a turbine trip that would require a reactor trip, and the Turbine Trip – Low Auto-Stop Oil Pressure trip Function does not need to be OPERABLE.

16. Safety Injection Input from Engineered Safety Feature Actuation System

The SI Input from ESFAS ensures that if a reactor trip has not already been generated by the RPS, the ESFAS automatic actuation logic will initiate a reactor trip signal upon any signal that initiates SI. This is 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.

Trip Setpoint and Allowable Values are not applicable to this Function. The SI Input is provided by relay in the ESFAS. Therefore, there is no measurement signal with which to associate an LSSS.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

The LCO requires two trains of SI Input from ESFAS to be OPERABLE in MODE 1 or 2.

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.

17. Reactor Trip System Interlocks

Reactor protection interlocks are provided to ensure reactor trips are in the correct configuration for the current unit status. They back up operator actions to ensure protection system Functions are not bypassed during unit conditions under which the safety analysis assumes the Functions are not bypassed. Therefore, the interlock Functions do not need to be OPERABLE when the associated reactor trip functions are outside the applicable MODES. These are:

a. Intermediate Range Neutron Flux, P-6

The Intermediate Range Neutron Flux, P-6 interlock is actuated when any NIS intermediate range channel goes approximately one decade above the minimum channel reading. If both channels drop below the setpoint, the permissive will automatically be defeated. Manual defeat of the P-6 interlock can be accomplished at any time by simultaneous actuation of both Reset pushbuttons. The LCO requirement for the P-6 interlock ensures that the following Functions are performed:

- on increasing power, the P-6 interlock allows the manual block of the NIS Source Range, Neutron Flux reactor trip. This prevents a premature block of the source range trip and allows the operator to ensure that the

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

intermediate range is OPERABLE prior to leaving the source range. The source range trip is blocked by removing the high voltage to the detectors;

- on decreasing power, the P-6 interlock automatically energizes the NIS source range detectors and enables the NIS Source Range Neutron Flux reactor trip; and

The LCO requires two channels of Intermediate Range Neutron Flux, P-6 interlock to be OPERABLE in MODE 2 when below the P-6 interlock setpoint.

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 if required.

The Allowable Value is NA for this function because there is no corresponding analytical limit modeled in the accident analysis. The surveillance acceptance criterion used for this Function is ≥3.1E-11 Amps.

b. Low Power Reactor Trips Block, P-7

The Low Power Reactor Trips Block, P-7 interlock, is actuated by input from either the Power Range Neutron Flux, P-10, or the Turbine First Stage Pressure. The LCO requirement for the P-7 interlock ensures that the following Functions are performed:

(1) on increasing power, the P-7 interlock (i.e., 2 of 4 Power Range channels increasing above the P-10 (Function 17.d) setpoint or 1 of 2 Turbine First Stage Pressure (Function 17.e) setpoint) automatically enables reactor trips on the following Functions:

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

- Pressurizer Pressure – Low;
- Pressurizer Water Level – High;
- Reactor Coolant Flow – Low (Two Loops);
- RCPs Breaker Open (Two Loops);
- Undervoltage RCPs; and
- Underfrequency RCPs.

These reactor trips are only required when operating above the P-7 setpoint (approximately 10% power). 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.

(2) on decreasing power, the P-7 interlock (i.e., 3 of 4 Power Range channels decreasing below the P-10 (Function 17.d) setpoint and 2 of 2 Turbine First Stage Pressure channels decreasing below the Turbine First Stage Pressure (Function 17.e) setpoint) automatically blocks reactor trips on the following Functions:

- Pressurizer Pressure – Low;
- Pressurizer Water Level – High;
- Reactor Coolant Flow – Low (Two Loops);
- RCP Breaker Position (Two Loops);
- Undervoltage RCPs; and
- Underfrequency RCPs

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

An Allowable Value is not applicable to the P-7 interlock because it is a logic Function. The P-10 interlock (Function 17.d) governs input from the Power Range instruments and the Turbine First Stage Pressure interlock (Function 17.e) governs input for turbine power.

The P-7 interlock is a logic Function with train and not channel identity. Therefore, the LCO requires one channel per train (i.e., two trains) of Low Power Reactor Trips Block, P-7 interlock to be OPERABLE in MODE 1.

The low power 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 10% power, which is in MODE 1.

c. Power Range Neutron Flux, P-8

The Power Range Neutron Flux, P-8 interlock is actuated below 50% power as determined by NIS power range detectors. The P-8 interlock automatically enables the Reactor Coolant Flow – Low (Single Loop) and RCP Breaker Position (Single Loop) reactor trips on low flow in one or more RCS loops whenever at least 2 of 4 of the Power Range instruments increase to above the P-8 setpoint. 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 approximately 50% power. On decreasing power, the reactor trip on low flow in any loop is automatically blocked whenever at least 3 of 4 the Power Range instruments decrease to below the P-8 setpoint.

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

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

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.

The Allowable Value is NA for this Function because there is no corresponding analytical limit modeled in the accident analysis. The surveillance acceptance criterion used for this Function is ≤35% RTP.

d. Power Range Neutron Flux, P-10

The Power Range Neutron Flux, P-10 interlock is actuated at approximately 10% power, as determined by two-out-of-four NIS power range detectors. If power level falls below 10% RTP 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:

- on increasing power, the P-10 interlock allows the operator to manually block the Intermediate Range Neutron Flux reactor trip;
- 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 by de-energizing the NIS source range detectors;
- the P-10 interlock provides one of the two inputs to the P-7 interlock; and

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

- 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.

The Allowable Value is NA for this Function because there is no corresponding analytical limit modeled in the accident analysis. The surveillance acceptance criterion used for this Function is ≤9% RTP.

e. Turbine First Stage Pressure

The Turbine First Stage Pressure interlock is actuated when the pressure in the first stage of the high pressure turbine is greater than approximately 10% of the rated full power pressure. This is determined by one-out-of-two pressure detectors. The LCO requirement for this Function ensures that one of the inputs to the P-7 interlock is available.

The LCO requires two channels of Turbine Impulse Pressure, input to the P-7 interlock, to be OPERABLE in MODE 1.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

The Turbine First Stage Pressure interlock must be OPERABLE when the turbine generator is operating. The interlock Function is not required OPERABLE in MODE 2, 3, 4, 5, or 6 because the turbine generator is not operating.

The Allowable Value is NA for this Function because there is no corresponding analytical limit modeled in the accident analysis. The surveillance acceptance criterion used for this Function is ≤9.5% RTP.

18. Reactor Trip Breakers

This trip Function applies to the RTBs exclusive of individual trip mechanisms. The LCO requires two OPERABLE trains of trip breakers. A trip breaker train consists of all trip breakers associated with a single RPS 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 RPS trip capability.

The LCO requires two OPERABLE trains of trip breakers. Two OPERABLE trains ensure no single random failure can disable the RPS trip capability. When a reactor trip breaker is being tested, both reactor trip breaker and the reactor trip bypass breaker associated with the RPS logic train not in test are closed. In this configuration, a single failure in the RPS logic train not in test could disable RPS trip capability; therefore, limits on the duration of testing are established.

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

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

19. 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 18 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 when the reactor is critical. In MODE 3, 4, or 5, these RPS trip Functions must be OPERABLE when the Rod Control System is capable of rod withdrawal or one or more rods are not fully inserted.

20. Automatic Trip Logic

The LCO requirement for the RTBs (Functions 18 and 19) and Automatic Trip Logic (Function 20) ensures that means are provided to interrupt the power to allow the rods to fall into the reactor core. Each RTB is equipped with a bypass breaker (RTBB) to allow testing of the trip breaker while the unit is at power. Each RTB and RTBB is equipped with an undervoltage coil and a shunt trip coil to trip the breaker open when needed. The reactor trip signals generated by the RPS Automatic Trip Logic cause the RTBs and associated bypass breakers to open and shut down the reactor.

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

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

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

The RPS instrumentation satisfies Criterion 3 of 10 CFR 50.36.

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, signal processing electronics, 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 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 is outside the safety analysis. Therefore, LCO 3.0.3 must be immediately entered if applicable in the current MODE of operation.

A.1

Condition A applies to all RPS 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.

(continued)

BASES

ACTIONS (continued)

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 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.

If the Manual Reactor Trip Function 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 applies 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 and C.2

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

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

(continued)

BASES

ACTIONS

C.1 and C.2 (continued)

This action addresses the train orientation of the relay logic 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 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 and D.2

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

The NIS power range detectors provide input to the Rod 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. 7).

The 6 hour Completion Time is consistent with LCO 3.2.4, "QUADRANT POWER TILT RATIO (QPTR)."

(continued)

BASES

ACTIONS

D.1 and 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 a Note that allows placing the inoperable channel in the bypass condition for up to 8 hours while performing routine surveillance testing of other channels. The 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.

E.1 and E.2

Condition E applies to the following reactor trip Functions:

- Power Range Neutron Flux – Low;
- Overtemperature ΔT;
- Overpower ΔT;
- Pressurizer Pressure – High;
- SG Water Level – Low Low; and
- SG Water Level – Low coincident with Steam Flow/Feedwater Flow Mismatch.

(continued)

BASES

ACTIONS

E.1 and E.2 (continued)

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 7.

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 a Note that allows placing the inoperable channel in the bypassed condition for up to 8 hours while performing routine surveillance testing of the other channels.

F.1 and F.2

Condition F applies when there are no Intermediate Range Neutron Flux trip channels OPERABLE in MODE 2 when THERMAL POWER is above the P-6 setpoint and below the P-10 setpoint. 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 detector performs the monitoring Functions. 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, one or both Source Range Neutron Flux channels will be able to monitor the core power level. The Completion Time of

(continued)

BASES

ACTIONS

F.1 and F.2 (continued)

2 hours will allow a slow and 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.

G.1

Condition G applies when there are no Source Range Neutron Flux trip channels OPERABLE when in MODE 2, below the P-6 setpoint, and in MODE 3, 4, or 5 with the Rod Control capable of rod withdrawal or one or more rods not rods 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 RTB's open, the core is in a more stable condition.

H.1 and H.2

Condition H applies to the following reactor trip Functions:

- Pressurizer Pressure – Low;
- Pressurizer Water Level – High;
- Reactor Coolant Flow – Low;
- RCP Breaker Position (Two Loops);
- Undervoltage RCPs; and
- Underfrequency RCPs.

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 setpoint for the two loop function and above the P-8 setpoint for the single loop function.

(continued)

BASES

ACTIONS

H.1 and H.2 (continued)

These Functions do not have to be OPERABLE below the P-7 setpoint because there are no loss of flow trips below the P-7 setpoint. The 6 hours allowed to place the channel in the tripped condition is justified in Reference 7. An additional 6 hours is allowed to reduce THERMAL POWER to below P-7 if the inoperable channel cannot be restored to OPERABLE status or placed in trip within the specified Completion Time. The Reactor Coolant Flow-Low (Single Loop) reactor trip does not have to be OPERABLE below the P-8 setpoint; however, the Required Action must take the plant below the P-7 setpoint if the inoperable channel is not tripped within 6 hour because of the shared components between this function and the Reactor Coolant Flow-Low (Two Loop) reactor trip function.

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

The Required Actions have been modified by a Note that allows placing the inoperable channel in the bypassed condition for up to 8 hours while performing routine surveillance testing of the other channels.

I.1 and I.2

Condition I applies to the RCP Breaker Position (Single Loop) 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 6 hours. If the channel cannot be restored to OPERABLE status within the 6 hours, then THERMAL POWER must be reduced below the P-8 setpoint within the next 4 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-8 setpoint because other RPS Functions provide core protection below the P-8 setpoint. The 6 hours allowed to restore the

(continued)

BASES

ACTIONS

I.1 and I.2 (continued)

channel to OPERABLE status and the 4 additional hours allowed to reduce THERMAL POWER to below the P-8 setpoint are justified in Reference 7.

The Required Actions have been modified by a Note that allows placing the inoperable channel in the bypassed condition for up to 8 hours while performing routine surveillance testing of the other channels.

J.1 and J.2

Condition J applies to Turbine Trip on Low Auto-Stop Oil Pressure. 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-8 setpoint within the next 6 hours. The 6 hours allowed to place the inoperable channel in the tripped condition and the 10 hours allowed for reducing power are justified in Reference 7.

The Required Actions have been modified by a Note that allows placing the inoperable channel in the bypassed condition for up to 8 hours while performing routine surveillance testing of the other channels.

K.1 and K.2

Condition K applies to the SI Input from ESFAS reactor trip and the RPS Automatic Trip Logic in MODES 1 and 2. These actions address the train orientation of the RPS for these Functions. With one train inoperable, 6 hours are allowed to restore the train to OPERABLE status (Required Action K.1) or the unit must be placed in MODE 3 within the next 6 hours. The Completion Time of 6 hours (Required Action K.1) is reasonable considering that in this Condition, the remaining OPERABLE train is adequate to

(continued)

BASES

ACTIONS

K.1 and K.2 (continued)

perform the safety function and given the low probability of an event during this interval. The Completion Time of 6 hours (Required Action K.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.

L.1 and L.2

Condition L applies to the RTBs in MODES 1 and 2. These actions address the train orientation of the RPS for the RTBs. With one train inoperable, 1 hour is allowed to restore the train to OPERABLE status or the unit must be placed in MODE 3 within the next 6 hours. The Completion Time of 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 6 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 RPS Function. Placing the unit in MODE 3 results in ACTION C entry while RTB(s) are inoperable.

The Required Actions have been modified by two Notes. Note 1 allows one channel to be bypassed for up to 2 hours for surveillance testing, provided the other channel is OPERABLE. Note 2 allows one RTB to be bypassed for up to 2 hours for maintenance on undervoltage or shunt trip mechanisms if the other RTB train is OPERABLE. The 2 hour time limit is justified in Reference 7.

As noted in Reference 9, the allowance of 2 hours for test and maintenance of reactor trip breakers provided in Condition L, Note 1, is less than the 6 hour allowable out of service time and the 8 hour allowance for testing of RPS train A and train B. In practice, if the reactor trip breaker is being tested at the same time as the associated logic train, the 8 hour allowance for testing of RPS train A and train B applies to both the logic train and the reactor trip breaker. This is acceptable based on the Safety Evaluation Report for Reference 7.

(continued)

BASES

ACTIONS (continued)

M.1 and M.2

Condition M applies to the P-6 and P-10 interlocks. With one or more channels 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 manually accomplishes 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 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 6 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 RPS Function.

N.1 and N.2

Condition N applies to the P-7 and P-8 interlocks and the turbine first stage pressure input to P-7. With one or more channels 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 raised. Verifying the interlock status manually accomplishes 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 6 hours is reasonable, based on operating experience, to reach MODE 2 from full power in an orderly manner and without challenging unit systems.

(continued)

BASES

ACTIONS (continued)

0.1 and 0.2

Condition O 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 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 applies 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 2 hours for the reasons stated under Condition L.

The Completion Time of 48 hours for Required Action O.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.

SURVEILLANCE REQUIREMENTS

The SRs for each RPS 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 RPS Functions.

Note that each channel of process protection supplies both train A and train B of the RPS. When testing an individual channel, the SR is not met until both train A and train B logic are tested. The CHANNEL CALIBRATION and COTs are performed in a manner that is consistent with the assumptions used in analytically calculating the required channel accuracies.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.1.1

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 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.

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

SR 3.3.1.2

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 ≥ 15% RTP and

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.1.2 (continued)

that 24 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.

SR 3.3.1.3

SR 3.3.1.3 compares the incore system to the NIS channel output every 31 EFPD. If the absolute difference is ≥ 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 ΔT Function.

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 ≥ 3%. SR 3.3.1.3 is performed to ensure that the AFD input to the Overtemperature Delta T and the system used to monitor LCO 3.2.3, AFD, are within acceptable limits. The limiting AFD is established to provide the required margin when operating at the highest power level. As power level decreases, the thermal limit becomes less sensitive to AFD because the overall margin to the thermal limit increases. Note 2 clarifies that the Surveillance is required only if reactor power is ≥ 90% because the requirements of LCO 3.2.3, Axial Flux Difference (AFD), are relaxed significantly below 90% RTP.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.1.3 (continued)

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 by actuation of the end devices.

The RTB test shall include separate verification of the undervoltage and shunt trip mechanisms. Independent verification of RTB undervoltage and shunt trip Function is not required for the bypass breakers. No capability is provided for performing such a test at power. The independent test of the undervoltage and shunt trip function for bypass breakers is included in SR 3.3.1.14. The bypass breaker test shall include a local shunt trip. A Note has been added to indicate that this test must be performed on the bypass breaker prior to 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.

SR 3.3.1.5

SR 3.3.1.5 is the performance of an ACTUATION LOGIC TEST. The RPS 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 possible logic combinations, with and without applicable permissives, are tested for each protection function required by Table 3.31-1. 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.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.1.6

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(ΔI) input to the overtemperature ΔT Function.

A Note modifies SR 3.3.1.6. The Note states that this Surveillance is required only if reactor power is > 90% because the requirements of LCO 3.2.3, Axial Flux Difference (AFD), are relaxed significantly below 90% RTP. SR 3.3.1.6 is performed to ensure that the AFD input to the Overtemperature Delta T and the system used to monitor LCO 3.2.3 AFD are within acceptable limits. The limiting AFD is established to provide the required margin when operating at the highest power level. As power level decreases, the thermal limit becomes less sensitive to AFD because the overall margin to the thermal limit increases.

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

SR 3.3.1.7

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.

Setpoints must be within the Allowable Values specified in Table 3.3.1-1.

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

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.1.7 (continued)

allowance used in the setpoint methodology. The setpoint shall be left set consistent with the assumptions of Reference 6 which incorporates the requirements of Reference 7.

SR 3.3.1.7 is modified by a Note that provides a 4 hour delay in the requirement to perform this Surveillance for source range instrumentation when entering MODE 3 from MODE 2. This Note allows a normal shutdown to proceed without a delay for testing in MODE 2 and for 4 hours in MODE 3 until the RTBs are open and SR 3.3.1.7 is no longer required to be performed. If the unit is to be in MODE 3 with the RTBs closed for > 4 hours this Surveillance must be performed prior to 4 hours after entry into MODE 3. The 4 hour deferral is needed because the testing required by SR 3.3.1.7 and SR 3.3.1.8 cannot be performed on the Source Range, Intermediate Range and Power Range Instruments until in the Applicable Mode and the proximity of these instruments prevents working on more than one instrument at any one time.

The Frequency of 92 days is justified in Reference 7.

SR 3.3.1.8

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. 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 and 12 hours after reducing power below P-10 and 4 hours after reducing power below P-6. The Frequency of "prior to 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 "12 hours after reducing power below P-10" (applicable to intermediate and power range low channels) and "4 hours after reducing power below P-6" (applicable to source range channels) allows a normal shutdown to be completed

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.1.8 (continued)

and the unit removed from the MODE of Applicability for this surveillance without a delay to perform the testing required by this surveillance. The Frequency of every 92 days thereafter applies if the plant remains in the MODE of Applicability after the initial performances of prior to reactor startup. Additionally, this SR must be completed for the intermediate and power range low channels within 12 hours after reducing power below the P-10 setpoint and must be completed for the source range low channel within 4 hours after reducing power below the P-6 setpoint. The MODE of Applicability for this surveillance is < P-10 for the power range low and intermediate range channels and < P-6 for the source range channels. Once the unit is in MODE 3, this surveillance is no longer required. If power is to be maintained < P-10 for more than 12 hours or < P-6 for more than 4 hours, then the testing required by this surveillance must be performed prior to the expiration of the time limit. The specified Frequency provides a reasonable time to complete the required testing or place the unit in a MODE where this surveillance is no longer required.

This test ensures that the NIS source, intermediate, and power range low channels are OPERABLE prior to taking the reactor critical and within a reasonable time after reducing power into the applicable MODE (< P-10 or < P-6). The deferral of the requirement to perform this test until 12 and 4 hours after entering the Applicable condition is needed because the testing required by SR 3.3.1.7 and SR 3.3.1.8 cannot be performed on the Source Range, Intermediate Range, and Power Range instruments until in the Applicable Mode and the proximity of these instruments prevents working on more than one instrument at any one time.

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 7.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.1.9 (continued)

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

SR 3.3.1.10

A CHANNEL CALIBRATION is performed at every refueling and every 18 months for function 11. 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.

CHANNEL CALIBRATIONS must be performed consistent with the assumptions used in Reference 6. 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 is based on the calibration interval used for 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 a Note stating that neutron detectors are excluded from the CHANNEL CALIBRATION. This is needed because the CHANNEL CALIBRATION for the

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.1.11 (continued)

power range neutron detectors consists of a normalization of the detectors based on a power calorimetric and flux map performed above 15% RTP. The CHANNEL CALIBRATION for the source range and intermediate range neutron detectors consists of obtaining the detector plateau or preamp discriminator curves, evaluating those curves, and comparing the curves to the manufacturer's data.

This Surveillance is not required for the NIS power range detectors for entry into MODE 2 or 1, and is not required for the NIS intermediate range detectors for entry into MODE 2, because the unit must be in at least MODE 2 to perform the test for the intermediate range detectors and MODE 1 for the power range detectors. The 24 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown these components usually pass the Surveillance when performed on the 24 month Frequency.

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 a Note stating that this test shall include verification of the rate lag compensation for flow from the core to the RTDs. Whenever a sensing element is replaced, the next required CHANNEL CALIBRATION of resistance temperature detectors (RTD) sensors, which may consist of an inplace qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel, is accomplished by an inplace cross calibration that compares the other sensing elements with the recently installed element.

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.

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BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.1.13

SR 3.3.1.13 is the performance of a COT of RPS interlocks every 24 months.

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, Turbine Trip, and the SI Input from ESFAS. 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 and Reactor Trip Bypass Breakers. The Reactor Trip Bypass Breaker test shall include testing of the automatic 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.

REFERENCES

1. FSAR, Chapter 7.

2. FSAR, Chapter 6.

3. FSAR, Chapter 14.

4. IEEE-279-1968

5. 10 CFR 50.49.

(continued)

BASES

REFERENCES (continued)

6. Engineering Standards Manual IES-3 and IES-3B, Instrument Loop Accuracy and Setpoint Calculation Methodology (IP3).

7. WCAP-10271-P-A, Supplement 2, Rev. 1, June 1990.

8. Consolidated Edison Company of New York, Inc. Indian Point Nuclear Generating Station Unit No. 3 Plant Manual Volume VI: Precautions, Limitations, and Setpoints, March 1975.

9. WCAP-14384, Implementation of RPS Technical Specification Relaxation Programs, Rev. 0, January 1996.

B 3.3 INSTRUMENTATION

B 3.3.2 Engineered Safety Feature Actuation System (ESFAS) Instrumentation

BASES

BACKGROUND

The ESFAS initiates necessary safety systems, based on the values of selected unit parameters, to protect against violating core design limits and the Reactor Coolant System (RCS) pressure boundary, and to mitigate accidents.

The ESFAS instrumentation is segmented into three distinct but interconnected modules as identified below:

- Field transmitters or process sensors and instrumentation: provide a measurable electronic signal based on the physical characteristics of the parameter being measured;

- Signal processing equipment including analog protection system, field contacts, and protection channel sets: provide signal conditioning, bistable setpoint comparison, process algorithm actuation, compatible electrical signal output to protection system devices, and control board/control room/ miscellaneous indications; and

- ESFAS automatic initiation relay logic: initiates the proper engineered safety feature (ESF) actuation in accordance with the defined logic and based on the bistable outputs from the signal process control and protection system.

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. In many cases, field transmitters or sensors that input to the ESFAS are shared with the Reactor Protection System (RPS). In some cases, the same channels also provide control system inputs. To account for calibration tolerances and instrument drift, which are assumed to

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BASES

BACKGROUND (continued)

occur between calibrations, statistical allowances are provided in the trip setpoint and Allowable Values. The OPERABILITY of each transmitter or sensor can be evaluated when its "as found" calibration data are compared against its documented acceptance criteria.

Signal Processing Equipment

Generally, three or four channels of process control equipment are used for the signal processing of unit parameters measured by the field instruments. The process control equipment provides signal conditioning, comparable output signals for instruments located on the main control board, and comparison of measured input signals with setpoints established by safety analyses. These setpoints are defined in FSAR, Chapter 6 (Ref. 1), Chapter 7 (Ref. 2), and Chapter 14 (Ref. 3). If the measured value of a unit parameter exceeds the predetermined setpoint, an output from a bistable is forwarded to the ESFAS relay logic for decision evaluation. Channel separation is maintained up to and through the input bays. However, not all unit parameters require four channels of sensor measurement and signal processing. Some unit parameters provide input only to the ESFAS relay logic, while others provide input to the ESFAS relay logic, the main control board, the unit computer, and one or more control systems.

Generally, if a parameter is used for input to the protection circuits only, 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 is still OPERABLE 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 is still OPERABLE with a one-out-of- two logic.

Generally, if a parameter is used for input to the ESFAS relay logic and a control function, four channels with a two-out-of-four logic are sufficient to provide the required

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BASES

BACKGROUND (continued)

reliability and redundancy. The circuit is designed 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. Again, a single failure will neither cause nor prevent the protection function actuation.

These requirements are described in IEEE-279-1968 (Ref. 4). The actual number of channels required for each unit parameter is specified in Reference 2 and discussed later in these Technical Specification Bases.

Trip Setpoints and Allowable Values

The following describes the relationship between the safety limit, analytical limit, allowable value and channel component calibration acceptance criteria:

a. A Safety Limit (SL) is a limit on the combination of THERMAL POWER, RCS highest loop average temperature, and RCS pressure needed to protect the integrity of physical barriers that guard against the uncontrolled release of radioactivity (i.e., fuel, fuel cladding, RCS pressure boundary and containment). The safety limits are identified in Technical Specification 2.0, Safety Limits (SLs).

b. An Analytical Limit (AL) is the trip actuation point used as an input to the accident analyses presented in FSAR, Chapter 14 (Ref. 3). Analytical limits are developed from event analyses models which consider parameters such as process delays, rod insertion times, reactivity changes, instrument response times, etc. An analytical limit for a trip actuation point is established at a point that will ensure that a Safety Limit (SL) is not exceeded.

c. An Allowable Value (AV) is the limiting actuation point for the entire channel of a trip function that will ensure, within the required level of confidence, that sufficient

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BASES

BACKGROUND (continued)

allocation exists between this actual trip function actuation point and the analytical limit. The Allowable Value is more conservative than the Analytical Limit to account for instrument uncertainties that either are not present or are not measured during periodic testing. Channel uncertainties that either are not present or are not measured during periodic testing may include design basis accident temperature and radiation effects (Ref. 6) or process dependent effects. The channel allowable value for each ESFAS function is controlled by Technical Specifications and is listed in Table 3.3.2-1, Engineered Safety Feature Actuation System Instrumentation.

d. Calibration acceptance criteria (i.e., setpoints) are established by plant administrative programs for the components of a channel (i.e., required sensor, alarm, interlock, display, and trip function). The calibration acceptance criteria are established to ensure, within the required level of confidence, that the Allowable Value for the entire channel will not be exceeded during the calibration interval.

A description of the methodology used to calculate the channel allowable values and calibration acceptance criteria is provided in References 6 and 8.

Setpoints in accordance with the Allowable Value ensure that the consequences of Design Basis Accidents (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 required to be OPERABLE can be tested on line, as necessary, to verify that the signal processing equipment and setpoint accuracy is within the specified allowance requirements of Reference 2. 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.

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BASES

BACKGROUND (continued)

The Allowable Values listed in Table 3.3.2-1 and the trip setpoints calculated to ensure that Allowable Values are not exceeded during the calibration interval are based on the methodology described in calculations performed in accordance with Reference 6. All field sensors and signal processing equipment for these channels are assumed to operate within the allowances of these uncertainty magnitudes.

ESFAS Relay Logic Protection System

The relay logic equipment is used for the decision logic processing of outputs from the signal processing equipment 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 ESF actuation for the unit. Each train is packaged in a cabinet for physical and electrical separation to satisfy separation and independence requirements.

The relay logic 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.

The bistable outputs from the signal processing equipment are sensed by the relay logic equipment and combined into logic that represent combinations indicative of various transients. If a required logic combination is completed, the system will send actuation signals via master and slave relays to 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, LCO and APPLICABILITY, LCO, and Applicability sections of this Bases.

Each relay logic train has a built in testing capability that can test the decision logic matrix functions and the actuation devices while the unit is at power. When any one train is taken out of service for testing, the other train is capable of

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BASES

BACKGROUND (continued)

providing unit monitoring and protection until the testing has been completed.

The actuation of ESF components is accomplished through master and slave relays. The relay logic energizes the master relays appropriate for the condition of the unit. Each master relay then energizes one or more slave relays, which then cause actuation of the end devices. The master and slave relays are routinely tested to ensure operation.

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 Pressure-Low is a primary actuation signal for small loss of coolant accidents (LOCAs) and a backup actuation signal for steam line breaks (SLBs) outside containment. Functions such as manual initiation, not specifically credited in the accident 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 identified in Table 3.3.2-1 to be OPERABLE. Failure of any instrument renders the affected channel(s) inoperable and reduces the reliability of the affected Functions.

The LCO generally requires OPERABILITY of four or three channels in each instrumentation function and two channels in each logic and manual initiation function. The two-out-of-three and the two-out-of-four configurations allow one channel to be tripped

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BASES

APPLICABLE SAFETY ANALYSES, LCO and APPLICABILITY, (continued)

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:

1. 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 (k_{eff} < 1.0).

These functions are necessary to mitigate the effects of high energy line breaks (HELBs) both inside and outside of containment. The SI signal is also used to initiate other Functions such as:

- Phase A Isolation;
- Containment Isolation;
- Reactor Trip;
- Turbine Trip;
- Feedwater Isolation;
- Start of auxiliary feedwater (AFW) pumps; and
- Control room ventilation actuation to the 10% incident mode.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO and APPLICABILITY (continued)

These other functions ensure:

- Isolation of nonessential systems through containment penetrations;
- Trip of the turbine and reactor to limit power generation;
- Isolation of main feedwater (MFW) to limit secondary side mass losses;
- Start of AFW to ensure secondary side cooling capability; and
- Isolation of the control room to ensure habitability.

a. Safety Injection-Manual Initiation

The LCO requires one channel per train to be OPERABLE. The operator can initiate both trains of SI at any time by using either of two push buttons 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 push button and the interconnecting wiring to the actuation logic cabinet. Each push button actuates both trains. This configuration does not allow testing at power.

b. Safety Injection-Automatic Actuation Logic and Actuation Relays

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BASES

APPLICABLE SAFETY ANALYSES, LCO and APPLICABILITY (continued)

This LCO requires two trains to be OPERABLE. Actuation logic consists of all circuitry within the actuation subsystems, including the initiating relay contacts responsible for actuating the ESF equipment.

Manual and automatic initiation of SI must be OPERABLE in MODES 1, 2, and 3. In these MODES, there is sufficient energy in the primary and secondary systems to warrant automatic initiation of ESF systems. 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 push buttons.

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-Containment Pressure-High

This signal provides protection against the following accidents:

- SLB inside containment; and
- LOCA.

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BASES

APPLICABLE SAFETY ANALYSES, LCO and APPLICABILITY (continued)

Containment Pressure-High provides no input to any control functions. Thus, three OPERABLE channels are sufficient to satisfy protective requirements with a two-out-of-three logic. The transmitters (d/p cells) and electronics are located outside of containment with the sensing line (high pressure side of the transmitter) located inside containment.

Thus, the high pressure Function will not experience any adverse environmental conditions and the trip setpoint reflects only steady state instrument uncertainties.

Containment Pressure-High must be OPERABLE in MODES 1, 2, and 3 when there is sufficient energy in the primary and secondary systems to pressurize the containment following a pipe break. In MODES 4, 5, and 6, there is insufficient energy in the primary or secondary systems to pressurize the containment.

d. Safety Injection-Pressurizer Pressure-Low

This signal provides protection against the following accidents:

- Inadvertent opening of a steam generator (SG) relief or safety valve;
- SLB;
- Inadvertent opening of a pressurizer relief or safety valve;
- LOCAs; and
- SG Tube Rupture.

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BASES

APPLICABLE SAFETY ANALYSES, LCO and APPLICABILITY (continued)

Three channels of pressurizer pressure provide input into the ESFAS actuation logic. These channels initiate the ESFAS automatically when two of the three channels exceed the low pressure setpoint. These protection channels also provide control functions; however, the two-out-of-three logic is considered adequate to provide the required protection.

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 (above the Pressurizer Pressure Interlock (Function 7) to mitigate the consequences of an HELB inside containment. This signal may be manually blocked by the operator below the Pressurizer Pressure Interlock (Function 7) setpoint. Automatic SI actuation below this pressure setpoint is performed by the Containment Pressure-High signal.

This Function is not required to be OPERABLE in MODE 3 below the Pressurizer Pressure Interlock (Funtion 8) setpoint. Other ESF 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- High Differential Pressure Between Steam Lines

Steam Line Pressure – High Differential Pressure Between Steam Lines provides protection against the following accidents:

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO and APPLICABILITY (continued)

- SLB; and
- Inadvertent opening of an ADV or an SG safety valve.

High Differential Pressure Between Steam Lines provides no input to any control functions. Thus, three OPERABLE channels on each steam line are sufficient to satisfy the requirements, with a two-out-of-three logic on each steam line.

With the transmitters located inside the auxiliary feed pump room, it is possible for them to experience adverse environmental conditions during a HELB event. Therefore, the surveillance acceptance criterion reflects both steady state and adverse environmental instrument uncertainties.

Steam line high differential pressure must be OPERABLE in MODES 1, 2, and 3 when a secondary side break or stuck open valve could result in the rapid depressurization of the steam line(s). This Function is not required to be OPERABLE in MODE 4, 5, or 6 because there is not sufficient energy in the secondary side of the unit to cause an accident.

The surveillance acceptance criterion used for this function is ≤142 psid.

f, g. Safety Injection-High Steam Flow in Two Steam Lines Coincident With T_{avg}-Low or Coincident With Steam Line Pressure-Low

These Functions (1.f and 1.g) provide protection against the following accidents:

- SLB; and
- the inadvertent opening of a SG safety valve.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO and APPLICABILITY (continued)

Two steam line flow channels per steam line are required OPERABLE for these Functions. The steam line flow channels 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 one-out-of-two configuration allows online testing because trip of one high steam flow channel is not sufficient to cause initiation. High steam flow in two steam lines is acceptable in the case of a single steam line fault due to the fact that the remaining intact steam lines will pick up the full turbine load. The increased steam flow in the remaining intact lines will actuate the required second high steam flow trip. Additional protection is provided by Function 1.e., High Differential Pressure Between Steam Lines.

One channel of T_{avg} per loop and one channel of low steam line pressure per steam line are required OPERABLE. For each parameter, the channels for all loops or steam lines are combined in a logic such that two channels tripped will cause a trip for the parameter. The Function trips on one-out-of-two high steam flow in any two-out-of-four steam lines if there is one-out-of-one low T_{avg} trip in any two-out-of-four RCS loops, or if there is a one-out-of-one low pressure trip in any two-out-of-four steam lines. Since the accidents that this event protects against cause both low steam line pressure and low T_{avg}, provision of one channel per loop or steam line ensures no single random failure can disable both of these Functions. The steam line pressure channels provide no control inputs. The T_{avg} channels provide control inputs, but the control function cannot initiate events that the Function acts to mitigate.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO and APPLICABILITY (continued)

The Allowable Value for high steam flow is a linear function that varies with power level. The function is a turbine first stage pressure corresponding to approximately 54% of full steam flow between 0% and 20% load to approximately 110% of full steam flow at 100% load. The nominal trip setpoint is similarly calculated.

With the transmitters located inside the containment (RCS temperature and steam line flow) or inside the auxiliary feedwater building (steam pressure), it is possible for them to experience adverse steady state environmental conditions during an SLB event. Therefore, the Allowable Value reflects both steady state and adverse environmental instrument uncertainties.

This Function must be OPERABLE in MODES 1, 2, and 3 when any MSIV is open because a secondary side break or stuck open valve could result in the rapid depressurization of the steam line(s). SLB may be addressed by Containment Pressure High (inside containment) or by High Steam Flow in Two Steam Lines coincident with Steam Line Pressure-Low, for Steam Line Isolation, followed by High Differential Pressure Between Two Steam Lines, for SI. 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. Containment Spray

Containment Spray provides three primary functions:

1. Lowers containment pressure and temperature after an HELB in containment;

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO and APPLICABILITY (continued)

2. Reduces the amount of radioactive iodine in the containment atmosphere; and

3. Adjusts the pH of the water in the containment and recirculation sump after a large break LOCA.

These functions are necessary to:

- Ensure the pressure boundary integrity of the containment structure;
- Limit the release of radioactive iodine to the environment; and
- Minimize corrosion of the components and systems inside containment following a LOCA.

The containment spray actuation signal starts the containment spray pumps. Water is drawn from the RWST by the containment spray pumps and mixed with a sodium hydroxide solution from the spray additive tank. When the RWST reaches a specified minimum level, the spray pumps are secured. RHR or recirculation pumps will be used if continued containment spray is required. Containment spray is actuated automatically by Containment Pressure-High High.

a. Containment Spray-Manual Initiation

Manual initiation of containment spray (CS) requires that two pushbuttons in the control room be depressed simultaneously which will actuate both trains of CS. Two pushbuttons must be depressed simultaneously to minimize the potential for an inadvertent actuation of CS which could have serious consequences. Each CS pushbutton closes one of the two contacts required to start CS train A and one of the two contacts required to start CS train B; depressing both pushbuttons

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO and APPLICABILITY (continued)

closes both of the contacts required to start CS train A and both of the contacts required to start CS train B. Two channels (contacts) are required to be Operable for CS train A and two channels (contacts) are required to be Operable for CS train B. Failure of one manual pushbutton will result in one inoperable channel in both trains.

Note that Manual Initiation of containment spray also actuates Phase B containment isolation and containment ventilation isolation.

b. Containment Spray-Automatic Actuation Logic and Actuation Relays

Automatic actuation logic and actuation relays consist of the same features and operate in the same manner as described for ESFAS Function 1.b.

Manual and automatic initiation of containment spray 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. However, because of the number of components actuated on a containment spray, actuation is simplified by the use of the manual actuation push buttons. Automatic actuation logic and actuation relays 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

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO and APPLICABILITY (continued)

operators to evaluate unit conditions and respond, to mitigate the consequences of abnormal conditions by manually starting individual components.

c. Containment Spray-Containment Pressure Hi-Hi

This signal provides protection against a LOCA or an SLB inside containment. The transmitters (d/p cells) are located outside of containment with the sensing line (high pressure side of the transmitter) located inside containment. The transmitters and electronics are located outside of containment. Thus, they will not experience any adverse environmental conditions and the Allowable Value reflects only steady state instrument uncertainties.

This Function requires the bistable output to energize to perform its required action. It is not desirable to have a loss of power actuate containment spray, because the consequences of an inadvertent actuation of containment spray could be serious. Therefore, the IP3 design consists of 2 sets of 3 channels (i.e., 6 pressure instruments) and 2 channels from each set of 3 are required to energize to actuate Containment Spray. This configuration provides sufficient redundancy to prevent a single failure from causing or preventing Containment Spray initiation even when testing with one inoperable channel already in trip. The Required Actions for an inoperable channel associated with this Function decreases the probability of an inadvertent actuation by allowing no more than one channel per set to be placed in trip.

Containment pressure is not used for control; therefore, this arrangement exceeds the minimum redundancy requirements.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO and APPLICABILITY (continued)

Containment Pressure- High High 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 pressurize the containment and reach the Containment Pressure High High setpoint.

3. Containment Isolation

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

There are two separate Containment Isolation signals, Phase A and Phase B. Phase A isolation isolates all automatically isolable process lines exiting containment, except component cooling water (CCW) and RCP seal return, at a relatively low containment pressure indicative of primary or secondary system leaks. For these types of events, forced circulation cooling using the reactor coolant pumps (RCPs) and SGs is the preferred (but not required) method of decay heat removal. Since CCW or RCP seal injection and return are required to support RCP operation, not isolating CCW and RCP seal return on the low pressure Phase A signal enhances unit safety by allowing operators to use forced RCS circulation to cool the unit. Isolating these functions on the low pressure signal may force the use of feed and bleed cooling, which could prove more difficult to control.

Phase A containment isolation is actuated automatically by SI, or manually via the actuation logic. All process lines exiting containment, with the exception of CCW and RCP seal return, are isolated. CCW and RCP seal return are not isolated at this time to permit continued operation of the

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO and APPLICABILITY (continued)

RCPs with cooling water flow to the thermal barrier heat exchangers and oil coolers. All process lines not equipped with remote operated isolation valves are manually closed, or otherwise isolated, prior to MODE 4 except those manual isolation valves needed to support plant operations.

Manual Phase A Containment Isolation is accomplished by either of two pushbuttons in the control room. Either push button actuates both trains. Note that manual actuation of Phase A Containment Isolation also actuates Containment Ventilation Isolation.

The Phase B signal isolates CCW and RCP seal return. This occurs at a relatively high containment pressure that is indicative of a large break LOCA or an SLB. For these events, forced circulation using the RCPs is no longer desirable. Isolating the CCW at the higher pressure does not pose a challenge to the containment boundary because the CCW System is a closed loop inside containment. Although some CCW system components may not meet all of the ASME Code requirements applied to the containment itself, the system is continuously pressurized to a pressure greater than the Phase B setpoint. Thus, routine operation demonstrates the integrity of the system pressure boundary for pressures exceeding the Phase B setpoint. Furthermore, because system pressure exceeds the Phase B setpoint, any system leakage prior to initiation of Phase B isolation would be into containment. Therefore, the combination of CCW System design and Phase B isolation ensures the CCW System is not a potential path for radioactive release from containment.

Phase B containment isolation is actuated by Containment Pressure-High High, or manually, via the actuation logic, as previously discussed. For containment pressure to reach a value high enough to actuate Containment Pressure-High High, a large break LOCA or SLB must have occurred and

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO and APPLICABILITY (continued)

containment spray must have been actuated. RCP operation will no longer be required and CCW and seal return to the RCPs are, therefore, no longer necessary. The RCPs can be operated with seal injection flow alone and without CCW flow to the thermal barrier heat exchanger.

Manual Phase B Containment Isolation is accomplished by either of two pushbuttons in the control room. Either pushbutton actuates both trains. Manual Phase B Containment Isolation is also initiated by Containment Spray manual pushbuttons. CS pushbuttons are depressed simultaneously, Phase B Containment Isolation and Containment Spray will be actuated in both trains.

a. Containment Isolation-Phase A Isolation

(1) Phase A Isolation-Manual Initiation

Manual Phase A Containment Isolation is actuated by either of two pushbuttons in the control room. Either pushbutton actuates both trains. Note that manual initiation of Phase A Containment Isolation also actuates Containment Ventilation Isolation.

(2) Phase A Isolation-Automatic Actuation Logic and Actuation Relays

Automatic Actuation Logic and Actuation Relays consist of the same features and operate in the same manner as described for ESFAS Function 1.b.

Manual and automatic initiation of Phase A Containment Isolation 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

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO and APPLICABILITY (continued)

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 Phase A Containment Isolation, actuation is simplified by the use of the manual actuation push buttons. Automatic actuation logic and actuation relays 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 to pressurize the containment to require Phase A Containment Isolation. There also is adequate time for the operator to evaluate unit conditions and manually actuate individual isolation valves in response to abnormal or accident conditions.

(3) Phase A Isolation-Safety Injection

Phase A Containment Isolation is also initiated by all Functions that initiate SI. The Phase A Containment Isolation 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.

b. Containment Isolation-Phase B Isolation

Phase B Containment Isolation is accomplished by Manual Initiation, Automatic Actuation Logic and Actuation Relays, and by Containment Pressure channels (the same channels that actuate Containment Spray, Function 2). The Containment Pressure trip of Phase B Containment Isolation is energized to trip in order to minimize the potential of spurious trips that may damage the RCPs.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO and APPLICABILITY (continued)

(1) Phase B Isolation-Manual Initiation

Manual Phase B Containment Isolation is accomplished by either of two pushbuttons in the control room. Either pushbutton actuates both trains.

(2) Phase B Isolation-Automatic Actuation Logic and Actuation Relays

Manual and automatic initiation of Phase B containment isolation 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. However, because of the number of components actuated on a Phase B containment isolation, actuation is simplified by the use of the manual actuation push buttons. Automatic actuation logic and actuation relays 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 to pressurize the containment to require Phase B containment isolation. There also is adequate time for the operator to evaluate unit conditions and manually actuate individual isolation valves in response to abnormal or accident conditions.

(3) Phase B Isolation-Containment Pressure Hi-Hi

The basis for containment pressure MODE applicability is as discussed for ESFAS Function 2.c above.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO and APPLICABILITY (continued)

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, even if Main Steam Check Valve fails. For an SLB upstream of the main steam isolation valves (MSIVs), inside or outside of containment, closure of 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-Manual Initiation

Manual initiation of Steam Line Isolation can be accomplished from the control room. Each main steam isolation valve (MSIV) will close if either of two solenoid valves in parallel (channel A and channel B) are opened. The pair of solenoid valves associated with each MSIV are operated by a single switch and there is a separate switch for each MSIV. Each of these switches actuates two channels. Except for the switch in the control room which is common to both channels, there are two separate and redundant circuits (channel A and channel B) capable of closing each MSIV. Therefore, the LCO requires 2 channels per MSIV and each MSIV is considered a separate Function.

b. Steam Line Isolation-Automatic Actuation Logic and Actuation Relays

Automatic actuation logic and actuation relays consist of the same features and operate 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 or

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO and APPLICABILITY (continued)

other accident. 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 all MSIVs are closed. In MODES 4, 5, and 6, there is insufficient energy in the RCS and SGs to experience an SLB or other accident releasing significant quantities of energy.

c. Steam Line Isolation-Containment Pressure (Hi-Hi)

This Function actuates closure of the MSIVs in the event of a LOCA or an SLB inside containment to limit the mass and energy release to containment. The transmitters (d/p cells) are located outside containment. Containment Pressure-High-High provides no input to any control functions. The transmitters and electronics are located outside of containment. Thus, they will not experience any adverse environmental conditions, and the Allowable Value reflects only steady state instrument uncertainties.

The IP3 design consists of 2 sets of 3 channels and 2 channels from each set of 3 are required to energize to actuate steam line isolation on high pressure in the containment. This is the same logic that initiates Containment Spray. Therefore, this logic is designed to provide sufficient redundancy to prevent a single failure from causing or preventing Containment Spray initiation even when testing with one inoperable channel already in trip. The Required Action for an inoperable channel associated with this Function is modified by a Note that permits no more than one channel per set to be placed in trip to decrease the probability of an inadvertent actuation.

Containment Pressure-High-High must be OPERABLE in MODES 1, 2, and 3, when there is sufficient energy in the primary and secondary side to pressurize the

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO and APPLICABILITY (continued)

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 all MSIVs are closed. In MODES 4, 5, and 6, there is not enough energy in the primary and secondary sides to pressurize the containment to the Containment Pressure – High-High setpoint.

d, e. Steam Line Isolation – High Steam Flow in Two Steam Lines Coincident with T_{avg}-Low or Coincident With Steam Line Pressure-Low

These Functions (4.d and 4.e) provide closure of the MSIVs during an SLB or inadvertent opening of a safety valve to limit RCS cooldown and the mass and energy release to containment.

These Functions were discussed previously as Functions 1.e. and 1.f.

These Functions must be OPERABLE in MODES 1 and 2, and in MODE 3, when a secondary side break or stuck open valve could result in the rapid depressurization of the steam lines unless all MSIVs are closed. These Functions are 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 function of the Feedwater Isolation signal is to stop the excessive flow of feedwater into the SGs. The Function is necessary to mitigate 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.

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BASES

APPLICABLE SAFETY ANALYSES, LCO and APPLICABILITY (continued)

This Function is actuated by SG Water Level-High High or by an SI signal. The RPS also initiates a turbine trip signal whenever a reactor trip is generated. In the event of SI, the unit is taken off line and the turbine generator must be tripped. 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-Safety Injection

Feedwater Isolation is also initiated by all Functions that initiate SI. Therefore, there are two trains of this Function, one initiated by SI train A and one initiated by SI train B.

b. Feedwater Isolation - Steam Generator Water Level- High High

This signal provides protection against excessive feedwater flow. Signals from two-out-of-three channels from any one SG will isolate feedwater flow by closing two MBFPDVs and MBFRVs. The LCO requires three OPERABLE channels per steam generator.

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.

Feedwater Isolation Functions must be OPERABLE in MODES 1 and 2 and 3 except when all MBFPDVs or MBFRVs and associated low flow bypass valves are closed or isolated by a closed manual valve when the MFW System is in operation. In MODES 4, 5, and 6, the MFW System is not in service and this Function is not required to be OPERABLE.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO and APPLICABILITY (continued)

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 two motor driven pumps and a turbine driven pump, making it available during normal unit operation, during a loss of AC power and during a loss of MFW. The normal source of water for the AFW System is the condensate storage tank (CST). Additionally, City Water (CW) may be aligned to AFW to provide a backup water supply. The AFW System is aligned so that upon a motor driven pump start, flow is initiated to the respective SGs immediately.

a. Auxiliary Feedwater-Automatic Actuation Logic and Actuation Relays

Automatic actuation logic and actuation relays consist of the same features and operate in the same manner as described for ESFAS Function 1.b.

b. Auxiliary Feedwater-Steam Generator Water Level-Low Low

SG Water Level-Low Low provides protection against a loss of heat sink due to a loss of MFW and the resulting loss of SG water level.

Signals from two-out-of-three channels from any one SG will start the motor driven AFW pumps. Signals from two-out-of-three channels from any two SGs will start the steam driven AFW pump. The LCO requires three OPERABLE channels per steam generator.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO and APPLICABILITY (continued)

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

c. Auxiliary Feedwater-Safety Injection

An SI actuation starts the motor 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.

d. Auxiliary Feedwater-Loss of Offsite Power

A turbine trip in conjunction with a loss of offsite power to the safeguards buses will be accompanied by a loss of reactor coolant pumping power and the subsequent need for some method of decay heat removal. The loss of offsite power (Non SI blackout signal) is detected by a voltage drop on 480 V bus 3A and/or 6A. Loss of power to either safeguards bus will start the turbine driven AFW pump 32 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 following a loss of offsite power.

The LCO requires two OPERABLE channels, one OPERABLE channel for bus 3A and one OPERABLE channel for bus 6A. Either channel will start the turbine driven AFW pump. Therefore, a single failure of one channel of non-Safety Injection blackout sequence will not result in a loss of Function.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO and APPLICABILITY (continued)

Functions 6.a through 6.d must be OPERABLE in MODES 1, 2, and 3 to ensure that the SGs remain the heat sink for the reactor. SG Water Level – Low Low in any operating SG will cause the motor driven AFW pump to start. The system is aligned so that upon a start of the pump, water immediately begins to flow to the SGs. SG Water Level – Low Low in any two operating SGs will cause the turbine driven pump to start. 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.

The Allowable Value for this Function is based on anticipated 480 V bus voltage transient conditions to prevent spurious trips and needless disconnection of safety buses from preferred power (Offsite Power). The analytical limit for event analysis purposes is 0 Volts AC (i.e. complete loss of offsite power). The Allowable Value is therefore is conservative relative to the actual operability limit.

e. Auxiliary Feedwater-Trip of Main Feedwater Pumps

A Trip of either MBFW pump is an indication of a potential loss of MFW and the potential need for some method of decay heat and sensible heat removal to bring the reactor back to no load temperature and pressure. Each turbine driven MBFW pump is equipped with a pressure switch on the control oil line for the speed control system. A low pressure signal from this pressure switch indicates a trip of that pump. The single channel associated with each operating MBFP will start both motor driven AFW pumps. However, there is no single failure tolerance for this Function unless both MBFPs are operating.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO and APPLICABILITY (continued)

This is acceptable because this is a backup method for starting AFW and other Functions, in particular SG Water Level – Low Low, provide the primary protection against a loss of heat sink. The LCO requires one Operable channel for each operating MBFP. A trip of either MBFW pump starts both motor driven AFW pumps to ensure that at least one SG is available with water to act as the heat sink for the reactor.

Function 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 loss of normal feedwater. In MODES 3, 4, and 5, the MBFW pumps are shut down, and thus MBFW pump trip does not require automatic AFW initiation.

7. ESFAS Interlock-Pressurizer Pressure

The Pressurizer Pressure interlock permits a normal unit cooldown and depressurization without actuation of SI. With two-out-of-three pressurizer pressure channels (discussed previously) less than the setpoint, the operator can manually block the Pressurizer Pressure-Low SI signal. With two-out-of-three pressurizer pressure channels above the setpoint, the Pressurizer Pressure-Low SI signal is automatically enabled. The operator can also enable these trips by use of the respective manual blocking switches.

This Function must be OPERABLE in MODES 1, 2, and 3 to allow an orderly cooldown and depressurization of the unit without the actuation of SI. The interlock Functions back up manual actions to ensure bypassable functions are in operation under the conditions assumed in the safety analyses. This Function does not have to be OPERABLE in MODE 4, 5, or 6 because system pressure must already be below the setpoint for the requirements of the heatup and cooldown curves to be met.

(continued)

BASES (continued)

APPLICABLE SAFETY ANALYSES, LCO and APPLICABILITY (continued)

The surveillance acceptance criterion for this function is ≤1884 psig.

The ESFAS instrumentation satisfies Criterion 3 of 10 CFR 50.36.

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 trip setpoint is found nonconservative with respect to the Allowable Value, or the transmitter, instrument Loop, signal processing electronics, 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 is outside the safety analysis. Therefore, LCO 3.0.3 should be immediately entered if applicable in the current MODE of operation.

A.1

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.

(continued)

BASES

ACTIONS (continued)

B.1, B.2.1 and B.2.2

Condition B applies to manual initiation of:

- SI;
- Containment Spray;
- Phase A Isolation; and
- Phase B Isolation.

This action addresses the train orientation of the 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. Note that for containment spray and Phase B isolation, failure of one or both channels in one train renders the train inoperable. Condition B, therefore, encompasses both situations.

The specified Completion Time is reasonable considering that there are two automatic actuation trains and another manual initiation train OPERABLE for each Function, 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 (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 logic and actuation relays for the following functions:

- SI;

(continued)

BASES

ACTIONS

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

- Containment Spray;
- Phase A Isolation; and
- Phase B Isolation.

This action addresses the train orientation of the relay logic and the master and slave relays. 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.

D.1, D.2.1 and D.2.2

Condition D applies to:

- Containment Pressure-High;
- Pressurizer Pressure-Low;
- High Differential Pressure Between Steam Lines;
- High Steam Flow in Two Steam Lines Coincident With T_{avg}-Low or Coincident With Steam Line Pressure-Low; and

(continued)

BASES

ACTIONS

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

- SG Water level-Low Low.

If one channel is inoperable, 6 hours are allowed to restore the channel to OPERABLE status or to place it in the tripped condition. Generally this Condition applies to functions that operate on two-out-of-three logic. Therefore, failure of one channel places the Function in a two-out-of-two configuration. One channel must be tripped to place the Function in a one-out-of-two configuration that satisfies redundancy requirements.

Required Actions associated with High Steam Flow in Two Steam Lines Coincident With Tavg-Low or Coincident With Steam Line Pressure-Low are entered by treating Steam Flow, Tavg, and Steam Line Pressure as three separate Functions. The protective action is initiated on one-out-of-two high flow in any two-out-of-four steam lines if there is one-out-of-one low Tavg trip in any two-out-of-four RCS loops, or if there is a one-out-of-one low pressure trip in any two-out-of-four steam lines. This logic is acceptable because a single steam line fault will cause the remaining intact steam lines to pick up the full turbine load with the protective action initiated by the conditions in the non faulted steam lines. Therefore, a maximum of one channel of each of the three Functions may be placed in trip without creating a condition where a single failure will either cause or prevent the protective action.

Failure to restore the inoperable channel to OPERABLE status or 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 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, 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 8 hours for surveillance testing of other channels.

(continued)

BASES

ACTIONS

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

The 6 hours allowed to restore the channel to OPERABLE status or to place the inoperable channel in the tripped condition, is justified in Reference 7.

E.1, E.2.1 and E.2.2

Condition E applies to:

- Steam Line Isolation Containment Pressure-(High High);
- Containment Spray Containment Pressure-(High, High); and
- Containment Phase B Isolation Containment Pressure-(High, High).

The IP3 design for the Containment Pressure (High High) ESFAS Function consists of 2 sets of 3 channels. This design requires that 2 channels from each set of 3 are energized to actuate the Containment Spray or Steam Line Isolation Functions. This configuration provides sufficient redundancy to prevent a single failure from causing or preventing containment spray initiation or steamline isolation even when testing with one inoperable channel per set already in trip.

Note that Condition E applies only when no more than one channel in one or both sets is inoperable. Otherwise, entry into LCO 3.0.3 is required. This is required because two inoperable channels from the same set that fail low could result in a loss of containment spray initiation or steamline isolation when a Containment Pressure (High High) ESFAS initiation is required. Additionally, this ensures that no more than one channel per set can be placed in trip which is required to decrease the probability of an inadvertent actuation of containment spray or steamline isolation if additional channels fail high.

An inoperable channel is placed in trip within 6 hours to limit the amount of time that a single failure of a different channel on the same set could result in the failure of containment spray or steamline isolation to actuate.

(continued)

BASES

ACTIONS

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

With no more than one channel from each set in trip, a single failure will not cause or prevent containment spray initiation or steamline isolation. Failure to place an inoperable channel in trip 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, these Functions are no longer required OPERABLE.

The Required Actions are modified by a Note that allows one additional channel to be bypassed for up to 8 hours for surveillance testing.

F.1, F.2.1 and F.2.2

Condition F applies to:

- Manual Initiation of Steam Line Isolation; and
- Loss of Offsite Power (Non Safety Injection).

For the manual MSIV isolation Function, each MSIV will close if either of the two channels required per MSIV is tripped. If one channel is inoperable, the ability to tolerate a single failure is lost but manual isolation capability is maintained. Therefore, an inoperable channel cannot be placed in trip without causing an actuation and the inoperable channel must be restored to Operable to restore single failure protection. Additionally, since a single switch actuates both channels for each MSIV, the failure of a manual switch may result in the failure of both channels and a loss of Function. The specified Completion Time, 48 hours to restore an inoperable channel, is reasonable considering that there are two automatic actuation trains and another manual initiation train OPERABLE for each MSIV, and the low probability of an event occurring during this interval. Each MSIV is considered a separate Function.

(continued)

BASES

ACTIONS

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

For the Loss of Offsite Power (Non-Safety Injection) Function, either channel (bus 3A or bus 6A) will start the turbine driven AFW pump. If one channel is inoperable, the AFW starting Function for the turbine driven AFW pump on loss of offsite power is maintained by the channel associated with the other bus. Two inoperable channels result in a loss of this Function; therefore, entry into LCO 3.0.3 is required.

For the Loss of Offsite Power (Non-Safety Injection) Function, an inoperable channel cannot be placed in trip without causing an actuation: therefore, an inoperable channel must be restored to Operable. The specified Completion Time, 48 hours to restore an inoperable channel, is reasonable considering that this is a Non-Safety Injection start of the AFW, the availability of manual starting capability, and the low probability of an event occurring during this interval. Additionally, other Functions, in particular SG Water Level-Low Low, provide the primary protection against a loss of heat sink.

If either of these Functions cannot be returned to OPERABLE status, the unit must be placed in 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 in an orderly manner and without challenging unit systems. In MODE 4, the unit does not have any analyzed transients or conditions that require the explicit use of the protection functions noted above.

G.1, G.2.1 and G.2.2

Condition G applies to the automatic actuation logic and actuation relays for the Steam Line Isolation and AFW actuation Functions.

The action addresses the train orientation of the relay logic and the actuation relays 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

(continued)

BASES

ACTIONS

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

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 unless the plant can be placed outside of the Applicable MODE or Conditions by other means (e.g., shutting all MSIVs). 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 protection channels and actuation functions. In this MODE, the unit does not have analyzed transients or conditions that require the explicit use of the protection 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.

H.1 and H.2

Condition H applies to the automatic actuation logic and actuation relays for the Feedwater Isolation Function.

This action addresses the train orientation of the relay logic and the actuation relays for this Function. If one train is inoperable, 6 hours are allowed to restore the train to OPERABLE status or the unit must be placed in MODE 3 within the following 6 hours unless the plant can be placed outside of the Applicable MODE or Conditions by other means (e.g., shutting all MBFPDVs or MBFRVs and associated bypass valves). 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. 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

(continued)

BASES

ACTIONS

H.1 and H.2 (continued)

systems. These Functions are no longer required in MODE 3. Placing the unit in MODE 3 removes all requirements for OPERABILITY of the protection channels and actuation functions. In this MODE, the unit does not have analyzed transients or conditions that require the explicit use of the protection 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.

I.1, I.2 and J.1

Condition I applies to the AFW pump start on trip of either Main Boiler Feedwater pump.

The OPERABILITY of the AFW System must be assured by allowing automatic start of the AFW System pumps. The single channel associated with each operating MBFP will start both motor driven AFW pumps. However, there is no single failure tolerance for this Function unless both MBFPs are operating. Therefore, when a channel is inoperable, Required Action I.1, verifies that one channel associated with an operating MBFP is OPERABLE to ensure that there is no loss of function. Otherwise, entry into LCO 3.0.3 is required. If both MBFPs are operating, Required Action I.2 allows 48 hours to restore redundancy by requiring one channel associated with each operating MBFP to be OPERABLE. Continued operation without redundant channels for 48 hours is acceptable because this is a backup method for starting AFW and other Functions, in particular SG Water Level – Low Low, provide the primary protection against a loss of heat sink.

If the function cannot be returned to an OPERABLE status, 6 hours are allowed by Required Action J.1 to place the unit in MODE 3.

(continued)

BASES

ACTIONS

I.1, I.2 and J.1 (continued)

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, the unit does not have any analyzed transients or conditions that require the explicit use of the protection function noted above.

K.1, K.2.1 and K.2.2

Condition K applies to the Pressurizer Pressure interlock.

With one or more channels inoperable, the operator must verify that the interlock is in the required state for the existing unit condition. This action manually accomplishes the function of the interlock. Determination must be made within 1 hour. The 1 hour Completion Time is equal to the time allowed by LCO 3.0.3 to initiate shutdown actions in the event of a complete loss of ESFAS function. If the interlock is not in the required state (or placed in the required state) for the existing unit condition, the unit must be placed in 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 this interlock.

SURVEILLANCE REQUIREMENTS

The SRs for each ESFAS Function are identified by the SRs column 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 process protection supplies both trains of the ESFAS. When testing an individual channel, the SR is not met until both train A and train B logic are tested.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

The CHANNEL CALIBRATION and COTs are performed in a manner that is consistent with the assumptions used in the setpoint methodology described in Reference 6.

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.

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

SR 3.3.2.2

SR 3.3.2.2 is the performance of an ACTUATION LOGIC TEST. The 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 possible logic combinations are tested for each protection function required in Table 3.3.2-1. In addition, the master relay is tested.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.2.2 (continued)

This verifies that the logic modules are OPERABLE and that there is a voltage signal path to the master 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.

SR 3.3.2.3

SR 3.3.2.3 is the performance of a MASTER RELAY TEST. The MASTER RELAY TEST is the energizing of the master relay, verifying contact operation and a low voltage continuity check of the slave relay coil. Upon master relay contact operation, a low voltage is supplied to the slave relay coil. This voltage is insufficient to pick up the slave relay, but large enough to demonstrate signal path continuity. This test is performed every 31 days on a STAGGERED TEST BASIS. The time allowed for the testing (8 hours) and the surveillance interval are justified in Reference 7.

SR 3.3.2.4

SR 3.3.2.4 is the performance of a COT.

A COT is performed on each required channel to ensure the entire channel (with the exception of the transmitter sensing device) will perform the intended Function. Setpoints must be found within the calibration acceptance criteria.

The "as found" and "as left" values must also be recorded and reviewed. 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 (Ref. 6).

The Frequency of 92 days is justified in Reference 7.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.2.5

SR 3.3.2.5 is the performance of a SLAVE RELAY TEST. The SLAVE RELAY TEST is the energizing of the slave relays. Contact operation is verified in one of two ways. Actuation equipment that may be operated in the design mitigation MODE is either allowed to function, or is placed in a condition where the circuit operation can be verified without operation of the equipment. Actuation equipment that may not be operated in the design mitigation MODE is prevented from operation. Alternately, contact operation may be verified by a continuity check of the circuit containing the slave relay. This test is performed every 24 months. The Frequency is adequate, based on industry operating experience, considering instrument reliability and operating history data.

SR 3.3.2.6

SR 3.3.2.6 is the performance of a TADOT. This test is a check of the Manual Actuation Functions and AFW pump start on trip of either MBFW pump or loss of offsite power (non SI). It is performed every 24 months. Each Manual Actuation Function is tested up to, and including, the master relay coils. In some instances, the test includes actuation of the end device (i.e., pump starts, valve cycles, etc.). 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 for manual initiation Functions. The manual initiation Functions have no associated setpoints.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.2.7

SR 3.3.2.7 is the performance of a CHANNEL CALIBRATION.

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 (Ref. 6). 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 an 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

1. FSAR, Chapter 6.

2. FSAR, Chapter 7.

3. FSAR, Chapter 14.

4. IEEE-279-1968.

5. 10 CFR 50.49.

6. Engineering Standards Manual IES-3 and IES-3B, Instrument Loop Accuracy and Setpoint Calculation Methodology (IP3).

(continued)

BASES

REFERENCES (continued)

7. WCAP-10271-P-A, Supplement 2, Rev. 1, June 1990.

8. Consolidated Edison Company of New York, Inc. Indian Point Nuclear Generating Station Unit No. 3 Plant Manual Volume VI: Precautions, Limitations, and Setpoints, March 1975.

B 3.3 INSTRUMENTATION

B 3.3.3 Post Accident Monitoring (PAM) Instrumentation

BASES

BACKGROUND

The primary purpose of the PAM instrumentation is to display unit variables that provide information required by the control room operators during accident situations. This information provides the necessary support for the operator to take the manual actions for which no automatic control is provided and that are required for safety systems to accomplish their safety functions for Design Basis Accidents (DBAs).

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 instruments are identified by unit specific documents (Ref. 1) addressing the recommendations of Regulatory Guide 1.97 (Ref. 2) as required by Supplement 1 to NUREG-0737 (Ref. 3).

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. The instruments governed by this LCO are the Type A and Category I variables which are defined as follows:

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.

(continued)

BASES

BACKGROUND (continued)

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;
- 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 the NRC proposed list of Category I variables.

The specific instrument Functions listed in Table 3.3.3-1 are discussed in the LCO section.

APPLICABLE SAFETY ANALYSES

The PAM instrumentation ensures the operability of Regulatory Guide 1.97 Type A and Category I variables so that the control room operating staff can:

- Perform the diagnosis specified in the emergency operating procedures (these variables are restricted to preplanned actions for the primary success path of DBAs), e.g., loss of coolant accident (LOCA);
- Take the specified, pre-planned, manually controlled actions, for which no automatic control is provided, and that are required for safety systems to accomplish their safety function;

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

- Determine whether systems important to safety are performing their intended functions;
- Determine the likelihood of a gross breach of the barriers to radioactivity release;
- Determine if a gross breach of a barrier has occurred; and
- Initiate action necessary to protect the public and to estimate the magnitude of any impending threat.

PAM instrumentation that meets the definition of Type A in Regulatory Guide 1.97 satisfies Criterion 3 of 10 CFR 50.36. Category I, non-Type A, instrumentation must be retained 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 therefore, meet Criterion 4 of 10 CFR 50.36.

LCO

The PAM instrumentation LCO provides OPERABILITY requirements for Regulatory Guide 1.97 Type A monitors, which provide information required by the control room operators to perform certain manual actions specified in the unit 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 PAM instrumentation provides information about selected unit parameters to monitor and assess unit status following an accident. This capability is consistent with the recommendations of Reference 1.

LCO 3.3.3 requires two OPERABLE channels for most functions. 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.

(continued)

BASES

LCO (continued)

Furthermore, OPERABILITY of two channels allows a CHANNEL 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 LCO requires one position indicator for each active CIV. This is sufficient to redundantly verify the isolation status of each isolable penetration either via indicated status of the active 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.

Table 3.3.3-1 provides a list of all Type A and Category I variables identified by the IP3 Regulatory Guide 1.97 analyses, as amended by the NRC's SER (Ref. 1), with one exception. Requirements for RWST level, which is a Type A and Category I variable, are stated in LCO 3.5.4.

Type A and Category I variables are required to meet Regulatory Guide 1.97 Category I (Ref. 2) design and qualification requirements for seismic and environmental qualification, utilization of emergency standby power, immediately accessible display, continuous readout, and recording of display.

The Safety Parameter Display System (SPDS) is provided to the Control Room to continuously display information from which plant status can be assessed. The SPDS consists of the Critical Functions Monitoring System (CFMS) and the Qualified Safety Parameters Display System (QSPDS). The CFMS displays and alarms critical safety functions (actions which preserve integrity of one or more physical barriers against radiation) in the Control Room and the emergency response facilities. The CFMS provides for historical data storage and retrieval capability. The CFMS is a redundant computer system not designed to seismic and electrical class 1E criteria. The QSPDS is a backup display system and is qualified to seismic and electrical class 1E standards (Ref. 4).

(continued)

BASES

LCO (continued)

Listed below are discussions of the specified instrument Functions listed in Table 3.3.3-1.

1. Neutron Flux

Neutron Flux indication covering full range of flux that may occur post accident is provided to verify reactor shutdown. Neutron flux is used for accident diagnosis, verification of subcriticality, and diagnosis of positive reactivity insertion.

To satisfy these requirements, an Excore Neutron Flux Detection System consisting of two detectors (N38, N39) provides two channels of neutron flux indication capable of providing indication from the source range to 100% RTP. The Excore Neutron Flux Detection System is an indication only system that displays on the QSPDS in the Control Room.

2,3. Reactor Coolant System (RCS) Hot and Cold Leg Temperatures (Wide Range)

RCS Hot and Cold Leg Temperatures are Category I variables required for verification of core cooling and long term surveillance. RCS cold leg temperature is used in conjunction with RCS hot leg temperature and steam generator pressure to verify the unit conditions necessary to establish natural circulation in the RCS.

This LCO is satisfied by the OPERABILITY of one hot leg channel and one cold leg channel in each of the four RCS loops:

Hot Leg Loop No. 1 (T413A)	Cold Leg Loop No. 1 (T413B)
Hot Leg Loop No. 2 (T423A)	Cold Leg Loop No. 2 (T423B)
Hot Leg Loop No. 3 (T433A)	Cold Leg Loop No. 3 (T433B)
Hot Leg Loop No. 4 (T443A)	Cold Leg Loop No. 4 (T443B)

The channels provide indication over a range of 0 °F to 700°F .

(continued)

BASES

LCO (continued)

Redundancy for the Hot Leg RCS Temperature is provided by the core exit thermocouples (Functions 18, 19, 20 and 21) which is considered a diverse variable for the RCS Hot Leg indication.

Redundancy for the Cold Leg RCS Temperature is provided by Steam Generator Pressure (Function 16).

4. Reactor Coolant System Pressure (Wide Range)

RCS wide range pressure is a Category I variable required for verification of core cooling and RCS integrity long term surveillance.

RCS pressure is used to verify closure of manually closed pressurizer spray line valves and pressurizer power operated relief valves (PORVs). In addition, RCS pressure is used to develop RCS subcooling. for determining whether to terminate actuated SI or to reinitiate stopped SI. RCS pressure can also be used:

- to determine when to reset SI and shut off low head SI;
- to manually restart low head SI;
- 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 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 valves during a controlled cooldown/depressurization.

(continued)

BASES

LCO (continued)

RCS pressure and pressurizer level are also used to determine whether to operate the pressurizer heaters.

RCS pressure is a Type A variable because the operator uses this indication to monitor the depressurization 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 or level, would use this indication.

The LCO requirement for RCS Pressure (wide range) indication is satisfied by pressure transmitters designated PT-402 and PT-403. Normal control room indication or recorders or displays on the QSPDS in the Control Room will satisfy this requirement. Pressurizer pressure instrumentation (PT-455, PT-456, PT-457, and PT-474) is available as a diverse means of monitoring RCS pressure.

5. Reactor Vessel Water Level

Reactor Vessel Water Level is required for verification and long term surveillance of core cooling. It is also used for accident diagnosis and to determine reactor coolant inventory adequacy.

This requirement is satisfied by the two channels of the Reactor Vessel Level Indicating System (RVLIS-A and RVLIS-B). The RVLIS automatically compensates for variations in fluid density as well as for the effects of reactor coolant pump operation.

The level reading represents the amount of liquid mass that is in the reactor vessel. Measurement of the collapsed water level is selected because it is a direct indication of the water inventory. The level instrumentation is divided into the full range and the dynamic range in order to measure level under all conditions. The full range gives level indication from the bottom of the reactor vessel to the top of the reactor head during natural circulation conditions. The dynamic range gives indication of reactor vessel liquid level for any combination of running RCP's.

(continued)

BASES

LCO (continued)

6,7. Containment Water Level (Wide Range) and Recirculation Sump Level

Containment Water Level is required for verification and long term surveillance of RCS integrity.

Containment Water Level is used for accident diagnosis and provides a diverse indication for RWST level regarding when to begin the recirculation procedure.

The LCO requirement for Containment Water Level indication is satisfied by level transmitters designated LT-1253 and LT-1254. The LCO requirement for Recirculation Sump Water Level indication is satisfied by transmitters designated LT-1251 and LT-1252. Normal control room recorders or QSPDS display will satisfy this requirement.

8. Containment Pressure (Wide Range)

Containment Pressure (Wide Range) is required for verification of need for and effectiveness of containment spray and fan cooler units.

The LCO requirement for Containment pressure indication is satisfied by pressure transmitters designated PT-1421 and PT-1422. Normal control room indication or QSPDS display will satisfy this requirement. Containment pressure narrow range instrumentation (PT-948A, B, C and PT-949A, B, C) is available to provide a diverse means of establishing containment pressure.

9. Automatic Containment Isolation Valve Position

CIV Position is provided for verification of Containment OPERABILITY and Phase A and Phase B isolation.

When used to verify Phase A and Phase B isolation, the important information is the isolation status of the containment penetrations.

(continued)

BASES

LCO (continued)

The LCO requires one channel of valve closed position indication in the control room (or at local control stations for valves without control room indication) 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. For containment penetrations with only one active CIV having control room indication, Note (d) requires a single channel of valve position indication to be OPERABLE. This is sufficient to redundantly verify the isolation 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 (c) 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.

Note that non-automatic containment isolation valves are not provided with position indication. As described in the Bases for LCO 3.6.3, "Containment Isolation Valves, containment isolation valves classified as essential and non-automatic are maintained in the open position and are closed after the initial phases of an accident. Emergency procedures are utilized to control the closing of these valves. Non-essential containment isolation valves are maintained in the closed position and may be opened, if necessary, for plant operation and for only as long as necessary to perform the intended function, under administrative controls described in the Bases for LCO 3.6.3.

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 invoke site emergency plans.

(continued)

BASES

LCO (continued)

The LCO requirement for Containment Area Radiation (high range) monitoring is satisfied by radiation monitors designated R-25 and R-26.

11. Containment Hydrogen Monitors

Hydrogen Monitors are provided to detect high hydrogen concentration conditions that represent a potential for containment breach from a hydrogen explosion. This variable is also important in verifying the adequacy of mitigating actions.

The LCO requirement for Containment Hydrogen monitoring is satisfied by containment hydrogen sampling monitors designated HCMC-A and HCMC-B. Hydrogen monitor OPERABILITY requires that at least one of the associated containment fan cooler units (FCU) is OPERABLE. HCMC-A is associated with FCU 32 or 35 and HCMC-B is associated with FCU 31 or 33 or 34.

12. Pressurizer Level

Pressurizer Level is used to determine whether to terminate SI, if still in progress, or to reinitiate SI if it has been stopped. Knowledge of pressurizer water level is also used to verify that the unit is maintained in a safe shutdown condition.

The LCO requirement for 2 channels of pressurizer level indication is satisfied by any two of the level instruments designated LT-459, LT-460 and LT-461.

13. Steam Generator Water Level (Narrow Range)

SG Water Level is required to monitor operation of decay heat removal via the SGs.

Each Steam Generator (SG) has three narrow range transmitters which span a range from the top of the tube bundles up to the moisture separator.

(continued)

BASES

LCO (continued)

Requirements for steam generator water level indication assume that two of the four steam generators are required for heat removal.

Narrow range SG water level is a Category I, Type A variable used to determine if the SG's are being maintained as an adequate heat sink for decay heat removal and to maintain the SG level and prevent overfill. It is also used to determine whether SI should be terminated and may be used to diagnose an SG tube rupture event. The LCO requirement is satisfied by any two instruments for each SG in the following list:

SG 31	SG 32	SG 33	SG 34
LT-417A	LT-427A	LT-437A	LT-447A
LT-417B	LT-427B	LT-437B	LT-447B
LT-417C	LT-427C	LT-437C	LT-447C

14. Steam Generator Water Level (Wide Range)

Each steam generator has one level transmitter that spans a range from the tube sheet up to the moisture separator.

Wide range SG water level is a Category I, Type A variable used to determine if the SG's are being maintained as an adequate heat sink for decay heat removal. The LCO requirement for wide range water level is satisfied by instruments designated LT-417D, LT-427D, LT-437D, and LT-447D. Redundancy for wide range level in each SG is provided by the Auxiliary Feedwater Flow for that SG (Function 15).

15. Auxiliary Feedwater Flow

AFW Flow is provided to monitor the decay heat removal capability of each SG. Although not a category I or Type A variable for IP3, these instrument channels provide redundancy for SG wide range level in the event of the limiting single failure of a power supply. This LCO is satisfied by the OPERABILITY of the following instruments:

(continued)

BASES

LCO (continued)

SG 31	SG 32	SG 33	SG 34
F1200	F1201	F1202	F1203

16. Steam Generator Pressure

Each SG contains 3 transmitters that indicate SG pressure. Requirements for steam generator pressure indication assume that two of the four steam generators are required for heat removal.

SG pressure is a Category I, Type A variable used to determine if a high energy secondary line rupture occurred and which steam generator is faulted. SG pressure is also used as the redundant channel of RCS cold leg temperature for natural circulation determination.

The LCO requirements for steam generator pressure indication is satisfied by any two channels from the following list for each of the four SGs:

SG 31	SG 32	SG 33	SG 34
PT-419A	PT-429A	PT-439A	PT-449A
PT-419B	PT-429B	PT-439B	PT-449B
PT-419C	PT-429C	PT-439C	PT-449C

17. Condensate Storage Tank (CST) Level

CST Level is provided to ensure water supply for auxiliary feedwater (AFW). The CST provides the ensured safety grade water supply for the AFW System.

CST Level is a Type A variable because the control room indication is the primary indication used by the operator.

The DBAs that require AFW are the loss of electric power, steam line break (SLB), and small break LOCA.

(continued)

BASES

LCO (continued)

The CST is the initial source of water for the AFW System. However, as the CST is depleted, manual operator action is necessary to replenish the CST or align suction to the AFW pumps to city water.

The LCO requirement for CST level indication is satisfied by level transmitters designated LT-1128 and LT-1128A. Normal control room indication or displays on the QSPDS in the Control Room will satisfy this requirement.

18, 19, 20, 21. Core Exit Temperature

Core Exit Temperature is required for verification and long term surveillance of core cooling. Core Exit Temperature is used as input for developing RCS Subcooling (Function 24) and is also used for unit stabilization and cooldown control. Core exit thermocouples also serve as a redundant channel for the RCS Hot Leg Temperature (Function 3).

There are 10 qualified CETs in each of two trains distributed among the four core quadrants. Requiring 2 CETs per train in each of the four quadrants provides assurance that sufficient CETs are available to support evaluation of core radial decay power distribution.

22. Main Steam Line (MSL) Radiation

The MSL radiation monitors are a Type A variable provided to allow detection of a gross secondary side radioactivity release and to provide a means to identify the faulted steam generator. The LCO requirements for MSL radiation indication are satisfied by one channel in each of the 4 MSLs using instruments designated R62A, R62B, R62C, R62D. Steam generator narrow range level (Function 13) serves as the redundant channel for the one MSL radiation monitor provided per loop.

(continued)

BASES

LCO (continued)

23. Gross Failed Fuel Detector

The gross failed fuel detector is a Type A variable provided to allow determination of reactor coolant system radioactivity concentration. The LCO requirement is satisfied by instrument loops R63A and R63B.

24. RCS Subcooling

RCS subcooling is a Type A variable provided to determine whether to terminate actuated SI or to reinitiate stopped SI, to determine when to terminate reactor coolant pump operation, and for unit stabilization and cooldown control. RCS subcooling is calculated and displayed in the plant Qualified Safety Parameter Display System using RCS Wide Range Pressure and Core Exit Temperature. Diverse indication is available using saturation pressure and steam tables.

APPLICABILITY

The PAM instrumentation LCO is applicable in MODES 1, 2, and 3. These variables are related to the diagnosis and pre-planned actions required to mitigate DBAs. The applicable DBAs are assumed to occur in MODES 1, 2, and 3. In MODES 4, 5, and 6, unit conditions are such that the likelihood of an event that would require PAM instrumentation is low; therefore, the PAM 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.

(continued)

BASES

ACTIONS (continued)

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.

A.1

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 into account any remaining OPERABLE channels, 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 PAM instrumentation during this interval.

B.1

Condition B applies when the Required Action and associated Completion Time for Condition A are not met. This Required Action specifies initiation of actions in Specification 5.6.7. which requires a written report to be submitted to the NRC immediately. This report discusses the results of the root cause 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.

C.1

Condition C applies when one or more Functions have two inoperable required channels (i.e., two channels inoperable in the same Function). Required Action C.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

(continued)

BASES

ACTIONS

C.1 (continued)

requiring PAM 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 PAM instrumentation.

Therefore, requiring restoration of one inoperable channel of the Function limits the risk that the PAM Function will be in a degraded condition should an accident occur.

D.1

Condition D applies when the Required Action and associated Completion Time of Condition C is not met. Required Action D.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 C and the associated Completion Time has expired, Condition D is entered for that channel and provides for transfer to the appropriate subsequent Condition.

E.1 and E.2

If the Required Action and associated Completion Time of Condition D is not met and Table 3.3.3-1 directs entry into Condition E, 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 and MODE 4 within 12 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.

(continued)

BASES

ACTIONS (continued)

E.1

Alternative means of monitoring neutron flux, condensate storage tank level, main steam line radiation, gross failed fuel, containment isolation valve position indications and containment area radiation are available. These alternate means may be used if the normal PAM channel cannot be restored to OPERABLE status within the allotted time. If these alternate means can be used, the Required Action is not to shut down the unit but rather to follow the directions in Specification 5.6.7, in the Administrative Controls section of the TS.

The report provided to the NRC should discuss the alternate means available, describe the degree to which the alternate means are equivalent to the installed PAM channels, justify the areas in which they are not equivalent, and provide a schedule for restoring the normal PAM channels.

SURVEILLANCE REQUIREMENTS

A Note has been added to the SR Table to clarify that SR 3.3.3.1 and SR 3.3.3.3 apply to each PAM instrumentation Function in Table 3.3.3-1.

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.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.3.1 (continued)

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.

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 measured parameter with the necessary range and accuracy. This SR is modified by a Note that excludes neutron detectors. The calibration method for neutron detectors is described in the Bases of LCO 3.3.1, "Reactor Trip System (RTS) Instrumentation." The Frequency is based on operating experience and consistency with the typical industry refueling cycle.

REFERENCES

1. Safety Evaluation: Conformance to Regulatory Guide 1.97, Revision 3, for Indian Point 3 (TAC No. 51099), dated April 3, 1991.

(continued)

BASES

REFERENCES (continued)

2. Regulatory Guide 1.97, Revision 3.

3. NUREG-0737, Supplement 1, "TMI Action Items."

4. FSAR, Section 7.

B 3.3 INSTRUMENTATION

B 3.3.4 Remote Shutdown

BASES

BACKGROUND

Remote Shutdown provides the control room operator with sufficient instrumentation and controls to place and maintain the unit in a safe shutdown condition from a location other than the control room. This capability is necessary to protect against the possibility that the control room becomes inaccessible. A safe shutdown condition is defined as MODE 3. With the unit in MODE 3, the Auxiliary Feedwater (AFW) System and the main steam safety valves (MSSVs) or the SG atmospheric dump valves (ADVs) can be used to remove core decay heat and meet all safety requirements. The long term supply of water for the AFW System and the ability to borate the Reactor Coolant System (RCS) from outside the control room allows extended operation in MODE 3.

If the control room becomes inaccessible, the operators can establish control at various local control stations and place and maintain the unit in MODE 3. Controls and transfer switches are operated locally at the switchgear, motor control panels, or other local stations. The unit automatically reaches MODE 3 following a unit shutdown and can be maintained safely in MODE 3 for an extended period of time.

The OPERABILITY of the local control and instrumentation functions ensures there is sufficient information available on selected unit parameters to place and maintain the unit in MODE 3 should the control room become inaccessible.

APPLICABLE SAFETY ANALYSES

Remote Shutdown is required to provide equipment at appropriate locations outside the control room to promptly shut down and maintain the unit in a safe condition in MODE 3.

The criteria governing the design and specific system requirements of the Remote Shutdown are located in 10 CFR 50, Appendix A, GDC 19 (Ref. 1).

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

Remote Shutdown capability and requirements for remote shutdown are presented in Reference 2.

Remote Shutdown is considered an important contributor to the reduction of unit risk to accidents and as such meets Criterion 4 of CFR 50.36.

LCO

The Remote Shutdown LCO provides the OPERABILITY requirements of the instrumentation and controls necessary to place and maintain the unit in MODE 3 from a location other than the control room. The instrumentation and controls required are listed in Bases Table B 3.3.4-1.

The controls, instrumentation, and transfer switches are required for:

- Core reactivity control (initial and long term);
- RCS pressure control;
- Decay heat removal via the AFW System and the MSSVs or SG ADVs;
- RCS inventory control via charging flow; and
- Safety support systems for the above Functions, including service water, component cooling water, and onsite power, including the diesel generators.

A Function of a Remote Shutdown is OPERABLE if all instrument and control channels needed to support the Remote Shutdown Function are OPERABLE. In some cases, Table 3.3.4-1 may indicate that the required information or control capability is available from several alternate sources. In these cases, the Function is OPERABLE as long as one channel of any of the alternate information or control sources is OPERABLE.

(continued)

BASES

LCO (continued)

The remote shutdown instrument and control circuits covered by this LCO do not need to be energized to be considered OPERABLE. This LCO is intended to ensure the instruments and control circuits will be OPERABLE if unit conditions require that the plant is shutdown from a location other than the control room.

APPLICABILITY

The Remote Shutdown LCO is applicable in MODES 1, 2, and 3. This is required so that the unit can be placed and maintained in MODE 3 for an extended period of time from a location other than the control room.

This LCO is not applicable in MODE 4, 5, or 6. In these MODES, the facility is already subcritical and in a condition of reduced RCS energy. Under these conditions, considerable time is available to restore necessary instrument control functions if control room instruments or controls become unavailable.

ACTIONS

Note 1 is included which excludes the MODE change restriction of LCO 3.0.4. This exception allows entry into an applicable MODE while relying on the ACTIONS even though the ACTIONS may eventually require a unit shutdown. This exception is acceptable due to the low probability of an event requiring remote shutdown and because the equipment can generally be repaired during operation without significant risk of spurious trip.

Note 2 has been added to the ACTIONS to clarify the application of Completion Time rules. Separate Condition entry is allowed for each Function listed on Table 3.3.4-1. 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.

A.1

Condition A addresses the situation where one or more required Remote Shutdown Functions are inoperable. This includes any Function listed in Table 3.3.4-1, as well as the control and transfer switches.

(continued)

BASES

ACTIONS

A.1 (continued)

The Required Action is to restore the required Function to OPERABLE status within 30 days. The Completion Time is based on operating experience and the low probability of an event that would require evacuation of the control room.

B.1 and B.2

If the Required Action and associated Completion Time of Condition A is 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 4 within 12 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.

The following Surveillance Requirements are applied to each of the remote shutdown function in Bawes Table B 3.3.4-1, as appropriate.

SURVEILLANCE REQUIREMENTS

The following Surveillance Requirements are applied to each of the remote shutdown functions in Table B 3.3.4-1, as appropriate.

SR 3.3.4.1

Performance of the CHANNEL CHECK once every 31 days 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. CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying that the

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.4.1 (continued)

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 the channels are within the criteria, it is an indication that the channels are OPERABLE. 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.

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

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

SR 3.3.4.2

SR 3.3.4.2 verifies each required Remote Shutdown control circuit and transfer switch performs the intended function. This verification is performed locally. Operation of the equipment is not necessary. The Surveillance can be satisfied by performance of a continuity check. This will ensure that if the control room becomes inaccessible, the unit can be placed and maintained in MODE 3 from the local control stations. The 24 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. (However, this Surveillance is not required to be performed only during a unit outage.) Operating experience demonstrates that remote shutdown control channels usually pass the Surveillance test when performed at the 24 month Frequency.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.4.3

CHANNEL CALIBRATION is a complete check of the instrument loop and the sensor. The test verifies that the channel responds to a measured parameter within the necessary range and accuracy.

The Frequency of 24 months is based upon operating experience and consistency with the typical industry refueling cycle.

REFERENCES

1. 10 CFR 50, Appendix A, GDC 19.
2. FSAR, Section 7.7.3.

BASES

Table B 3.3.4-1 (page 1 of 1)
Remote Shutdown Instrumentation and Controls

FUNCTION/INSTRUMENT OR CONTROL PARAMETER	REQUIRED NUMBER OF FUNCTIONS
1. Reactivity Control	
a. Source Range Neutron Flux	1
b. Reactor Trip Breaker Position	1 per trip breaker
c. Manual Reactor Trip	2
2. Reactor Coolant System (RCS) Pressure Control	
a. Pressurizer Pressure or RCS Wide Range Pressure	1
b. Pressurizer Heaters	1
3. Decay Heat Removal via Steam Generators (SGs)	
a. RCS Hot Leg Temperature (loop 31)	1
b. RCS Cold Leg Temperature (loop 31)	1
c. AFW Controls	1
d. SG Pressure	1
e. SG Level	1
4. RCS Inventory Control	
a. Pressurizer Level	1
b. Charging Pump Controls	1

B 3.3 INSTRUMENTATION

B 3.3.5 Loss of Power (LOP) Diesel Generator (DG) Start Instrumentation

BASES

BACKGROUND

The DGs provide a source of emergency power when offsite power is either unavailable or is insufficiently stable to allow safe unit operation. Undervoltage protection will generate a DG start if a loss of voltage or degraded voltage condition occurs on a 480 V bus.

Two undervoltage relays are provided on each 480 V bus for detecting a bus undervoltage. Either of the two relays is sufficient to satisfy requirements for the 480 V bus undervoltage Function even though the failure of the one remaining undervoltage relay could result in the failure of one DG to start because there is redundancy in the number of EDGs available. The two undervoltage relays are combined in a one-out-of-two logic per bus to generate an undervoltage signal. The allowable value and trip setpoint for this function is established in accordance with Reference 3. Actuation of these relays will trip the bus supply breaker, initiate load shedding, start the DG, and initiate load sequencing. There is no explicit time delay for this function because the undervoltage protection devices are induction type disc relays. Therefore, the time to actual trip will decrease as a function of voltage decrease below the setpoint.

Two degraded voltage relays are provided on each 480 V bus for detecting degraded bus voltage. The relays are combined in a two-out-of-two logic per bus (to prevent spurious actuation). The allowable value and trip setpoint for this function is established in accordance with Reference 3. Function actuation includes a time delay of ≤ 10 seconds if a coincident SI signal indicates accident conditions exist and a time delay of ≤ 45 seconds if no SI signal is generated (i.e., non-accident condition). These time delays ensure proper coordination with plant electrical transients (e.g. large motor starts, fast transfers, etc.). Actuation of these relays will trip the bus supply breaker, which will in turn actuate the undervoltage relays.

(continued)

BASES

BACKGROUND (continued)

The LOP start actuation is described in FSAR, Section 8.2 (Ref. 1).

Trip Setpoints and Allowable Values

Technical Specification Allowable Values are determined based on the relationship between an analytical limit and a calculated trip setpoint. A detailed discussion of the relative position of the safety limit, analytical limit, allowable value and the trip setpoint with respect to the normal plant operation point is presented in the Bases of LCO 3.3.1, Reactor Protection System (RPS) Instrumentation.

A detailed description of the methodology used to calculate the channel Allowable and bistable device, including their explicit uncertainties, is provided in Engineering Standards Manual IES-3 and IES-3B, Instrument Loop Accuracy and Setpoint Calculation Methodology (IP3) (Ref. 3).

APPLICABLE SAFETY ANALYSES

The LOP DG start 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 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 required channels of LOP DG start instrumentation, in conjunction with the ESF systems powered from the DGs, provide unit protection in the event of any of the analyzed accidents discussed in Reference 2, in which a loss of offsite power is assumed.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

The delay times assumed in the safety analysis for the ESF equipment include the 10 second DG start delay, and the appropriate sequencing delay. The response times for ESFAS actuated equipment in LCO 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation," include the appropriate DG loading and sequencing delay.

The LOP DG start instrumentation channels satisfy Criterion 3 of 10 CFR 50.36.

LCO

The LCO for LOP DG start instrumentation requires that 1 channel per bus of the undervoltage (480 V bus) Function and two channels per bus of the Degraded Voltage (480 V bus) Function must be OPERABLE in MODES 1, 2, 3 and 4 when the LOP DG start instrumentation supports safety systems associated with the ESFAS. In MODES 5 and 6, 1 channel per bus of the undervoltage (480 V bus) Function and two channels per bus of the Degraded Voltage (480 V bus) Function 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.

APPLICABILITY

The LOP DG Start 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 LOP or degraded power to the vital bus.

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.

(continued)

BASES

ACTIONS (continued)

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.

A.1

Condition A applies to the LOP DG start Function with one required channel of the undervoltage function inoperable. Note that LCO 3.3.5 requires that only one of the two undervoltage (480 V bus) channels must be OPERABLE. Therefore, Condition A applies when there is no OPERABLE undervoltage (480 V bus) channel on one or more 480 volt vital bus(es).

If one required channel is inoperable or one or more 480 V buses, Required Action A.1 requires that channel to be restored to OPERABLE status within 1 hour.

The specified Completion Time of 1 hour to restore an undervoltage (480 V bus) channels to OPERABLE status is needed because this Condition represents a loss of the undervoltage DG starting Function for the associated DG. The 1 hour delay in declaring the DG inoperable is acceptable because of the low probability of an event occurring during this interval.

B.1

Condition B applies when one of the two required degraded voltage channels is inoperable on one or more 480 V bus. Required Action B.1 requires placing the inoperable channel in trip so that trip capability is restored to the 2 out of 2 logic used to initiate this Function. The 1 hour Completion Time takes into account the low probability of an event requiring an LOP start occurring during this interval.

(continued)

BASES

ACTIONS (continued)

C.1

Condition C applies to each of the LOP DG start Functions when the Required Action and associated Completion Time for Condition A or B are not met. Condition C also applies when two channels of Degraded Voltage Function inoperable in one or more buses. In this Condition, Function trip capability is lost even if one of the channels is placed in trip as specified in Required Action B.1.

In these circumstances the Conditions specified in LCO 3.8.1, "AC Sources – Operating," or LCO 3.8.2, "AC Sources – Shutdown," for the DG made inoperable by failure of the LOP DG start instrumentation are required to be entered immediately. The actions of those LCOs provide for adequate compensatory actions to assure unit safety.

SURVEILLANCE REQUIREMENTS

SR 3.3.5.1

SR 3.3.5.1 is the performance of a TADOT. This test is performed every 31 days. The test checks trip devices that provide actuation signals directly, bypassing the analog process control equipment. The Frequency is based on the known reliability of the relays and controls and the multichannel redundancy available, and has been shown to be acceptable through operating experience.

SR 3.3.5.2

SR 3.3.5.2 is the performance of a CHANNEL CALIBRATION.

The setpoints, as well as the response to a loss of voltage and a degraded voltage test, shall include a single point verification that the trip occurs within the required time delay, as applicable.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.5.2 (continued)

A CHANNEL CALIBRATION is performed every 24 months for the undervoltage relay and every 18 months for the degraded voltage relay. 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 justified by the assumption of the calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis (Ref. 3).

REFERENCES

1. FSAR, Section 8.2.

2. FSAR, Chapter 14.2.

3. Engineering Standards Manual IES-3 and IES-3B, Instrument Loop Accuracy and Setpoint Calculation Methodology (IP3).

B 3.3 INSTRUMENTATION

B 3.3.6 Containment Purge System and Pressure Relief Line Isolation Instrumentation

BASES

BACKGROUND

Containment purge system and pressure relief line isolation instrumentation closes the containment isolation valves in the Pressure Relief Line and the Containment Purge System. This action isolates the containment atmosphere from the environment to minimize releases of radioactivity in the event of an accident. The Containment Pressure Relief Line may be in use during reactor operation and the Containment Purge System may be in use with the reactor shutdown.

The Containment Purge System consists of the 36-inch containment purge supply and exhaust penetrations. The containment purge supply and exhaust penetrations each include two butterfly valves for isolation. The containment purge exhaust penetration includes two butterfly valves for isolation and can be aligned to discharge to the atmosphere through the plant vent either directly or through the Containment Purge Filter System (i.e., a filter bank with roughing, HEPA and charcoal filters).

The Containment Purge System is isolated when in Modes 1, 2, 3 and 4 in accordance with requirements established in LCO 3.6.3, Containment Isolation Valves. In Modes 5 and 6, the Containment Purge System may be used for containment ventilation. When open, the Containment Purge System isolation valves are automatically closed when high radiation levels are detected by the Containment Air Particulate Monitor (R-11) or Containment Radioactive Gas Monitor (R-12).

The Containment Purge System isolation capability is not the primary method for ensuring that 10 CFR 100 limits are not exceeded during a fuel handling event (Ref. 1). As specified in LCO 3.9.3, Containment Penetrations, the Containment Purge System is aligned to discharge through the Containment Purge Filter System during CORE ALTERATIONS or movement of irradiated fuel until the reactor has been shutdown for at least 550 hours.

(continued)

BASES

BACKGROUND (continued)

Purge path filtration during the first 550 hours following reactor shutdown ensures that the dose limit for a fuel handling accident of 75 rem to the thyroid (25 percent of the 10 CFR Part 100 limit of 300 rem) at the Exclusion Area Boundary (EAB) (i.e., site boundary) is not exceeded (Ref. 2).

The Containment Pressure Relief Line (i.e., Containment Vent) consists of a single 10-inch containment vent line that is used to handle normal pressure changes in the Containment when in Modes 1, 2, 3 and 4. The Containment Pressure Relief Line is equipped with three quick-closing butterfly type isolation valves, one inside and two outside the containment which isolate automatically as part of Safety Injection ESFAS signal (LCO 3.3.2, Function 1) and Containment Spray ESFAS signal (LCO 3.3.2, Function 2). Automatic isolation of the Containment Pressure Relief Line is also initiated when high radiation levels are detected by the Containment Air Particulate Monitor (R-11) or Containment Radioactive Gas Monitor (R-12).

The Containment Pressure Relief Line is isolated during CORE ALTERATIONS or movement of irradiated fuel during the first 550 hours following reactor shutdown as specified in LCO 3.9.3. Although the Containment Pressure Relief Line discharges to the atmosphere via the Containment Auxiliary Charcoal Filter System (i.e., a filter bank with roughing, HEPA and charcoal filters), the Containment Auxiliary Charcoal Filter System is not required to be tested in accordance with Specification 5.5.10, Ventilation Filter Test Program.

Both the Containment Purge supply and exhaust isolation valves (FCV-1170, FCV-1171, FCV-1172, and FCV-1173) and the containment pressure relief isolation valves (PCV-1190, PCV-1191, and PCV-1192) close when high radiation levels are detected by the Containment Air Particulate Monitor (R-11) or Containment Radioactive Gas Monitor (R-12). The Safety Injection ESFAS signal (LCO 3.3.2, Function 1) and Containment Spray ESFAS signal (LCO 3.3.2, Function 2) also cause closure of the Containment Purge isolation valves and the containment pressure relief

(continued)

BASES

BACKGROUND (continued)

isolation valves. Although not required to satisfy Technical Specification requirements, containment purge and containment pressure relief are also isolated when high radiation levels are detected in the plant vent.

APPLICABLE SAFETY ANALYSES

In MODE 1, 2, 3 or 4, Containment Purge System automatic isolation capability is not required because the Containment Purge System is isolated in accordance with the requirements of LCO 3.6.3, Containment Isolation Valves.

During CORE ALTERATIONS or movement of irradiated fuel in the containment, Containment Purge System automatic isolation capability is required because it provides for automatic containment isolation in response to a fuel handling accident. As specified in LCO 3.9.3, Containment Penetrations, the Containment Purge System is aligned to discharge through the Containment Purge Filter System during CORE ALTERATIONS or movement of irradiated fuel until the reactor has been shutdown for at least 550 hours. Purge path filtration during the first 550 hours following reactor shutdown ensures that the dose limit for a fuel handling accident of 75 rem to the thyroid (25 percent of the 10 CFR Part 100 limit of 300 rem) at the EAB (i.e., site boundary) is not exceeded (Ref. 2). Although Containment Purge System isolation capability is not required to meet 10 CFR Part 100 limits during a fuel handling accident, this function provides a backup to the filtering function assumed in the analysis and is required to provide containment isolation following the event.

In MODE 1, 2, 3 or 4, Containment Pressure Relief Line automatic isolation capability is required as part of the containment isolation function initiated by the Engineered Safety Feature Actuation System (ESFAS) Instrumentation required by LCO 3.3.2. Containment Pressure Relief Line automatic isolation when high radiation levels are detected by the Containment Air Particulate Monitor (R-11) or Containment Radioactive Gas Monitor (R-12) provides a backup to the closure initiated by the ESFAS system.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

During CORE ALTERATIONS or movement of irradiated fuel in the containment, Containment Pressure Relief Line automatic isolation capability is not required because the Containment Pressure Relief Line is isolated as specified in LCO 3.9.3. The Containment Pressure Relief Line is isolated because the fuel handling accident analysis (References 1 and 2) credits filtration and not automatic isolation to ensure 10 CFR 100 limits are met. The Containment Auxiliary Charcoal Filter System which filters the Containment Pressure Relief Line is not required to be tested in accordance with Specification 5.5.10, Ventilation Filter Test Program.

The containment purge system and pressure relief line isolation instrumentation satisfies Criterion 3 of 10 CFR 50.36.

LCO

The LCO requirements ensure that the instrumentation listed in Table 3.3.6-1, is OPERABLE. This instrumentation is required to initiate automatic isolation of the Containment Purge System and the Containment Pressure Relief Line.

1. Automatic Actuation Logic and Actuation Relays

The LCO requires two trains of Automatic Actuation Logic and Actuation Relays OPERABLE to ensure that no single random failure can prevent automatic actuation.

Automatic Actuation Logic and Actuation Relays are required to be OPERABLE to support the Operability of all of the required functions that isolate the containment purge system and pressure relief line (i.e., gaseous and particulate radiation monitors (R-11 and R-12) and ESFAS SI and containment spray initiation signals). The term Automatic Actuation Logic and Actuation Relays applies to those portions of the circuit that are: 1) common to more than one channel in one train of a single function (i.e., the automatic actuation logic); or, 2) the initiating relay contacts in one train responsible for actuating the

(continued)

BASES

LCO (continued)

equipment and which are common to more than one channel of a single function and more than one function (i.e., the actuation relays). There are two trains of automatic actuation logic and actuation relays for the containment purge system and pressure relief line.

If one or more of the SI or Containment Spray Functions becomes inoperable in such a manner that only the Containment Purge Isolation Function is affected, the Conditions applicable to their SI and Containment Spray Functions need not be entered. The less restrictive Actions specified for inoperability of the Containment Purge System and Pressure Relief Line Isolation Functions specify sufficient compensatory measures for this case.

2. Containment Radiation Monitors

The LCO specifies two required channels of radiation monitors to ensure that the radiation monitoring instrumentation necessary to initiate Containment Purge System Isolation remains OPERABLE. The requirement for two channels is satisfied by the Containment Air Particulate Monitor (R-11) and the Containment Radioactive Gas Monitor (R-12). Allowable values and setpoints for these Functions are specified in the IP3 Offsite Dose Calculation Manual (Ref. 3).

Channel OPERABILITY involves more than OPERABILITY of the channel electronics. OPERABILITY may also require correct valve lineups, sample pump operation, and filter motor operation, as well as detector OPERABILITY, if these supporting features are necessary for trip to occur under the conditions assumed by the safety analyses.

(continued)

BASES

LCO (continued)

3. ESFAS Function 1, Safety Injection, and ESFAS Function 2, Containment Spray Monitors

Refer to LCO 3.3.2, Functions 1 and 2, for all initiating Functions and requirements.

APPLICABILITY

In MODE 1, 2, 3 or 4, Containment Purge System automatic isolation capability is not required because the Containment Purge System is isolated in accordance with the requirements of LCO 3.6.3, Containment Isolation Valves.

During CORE ALTERATIONS or movement of irradiated fuel in the containment, Containment Purge System automatic isolation Function 1, Automatic Actuation Logic and Actuation Relays, and Function 2, Containment Radiation, are required to be OPERABLE to ensure Containment Purge System isolation in response to a fuel handling accident.

In MODE 1, 2, 3 or 4, Containment Pressure Relief Line automatic isolation Function 1, Automatic Actuation Logic and Actuation Relays, and Function 3, ESFAS Safety Injection and ESFAS Containment Spray, are required as part of the containment isolation function initiated by the Engineered Safety Feature Actuation System (ESFAS) Instrumentation required by LCO 3.3.2 Containment Pressure Relief Line automatic isolation Function 2, Containment Radiation, is required as a backup to the closure initiated by the ESFAS system.

During CORE ALTERATIONS or movement of irradiated fuel in the containment, Containment Pressure Relief Line automatic isolation capability is not required because the Containment Pressure Relief Line is isolated as specified in LCO 3.9.3.

While in MODES 5 and 6 without fuel handling in progress, the containment purge system and pressure relief line isolation instrumentation need not be OPERABLE since the potential for radioactive releases is minimized and operator action is sufficient to ensure post accident offsite doses are maintained within the limits of 10 CFR 100.

(continued)

BASES (continued)

ACTIONS

The most common cause of channel inoperability is outright failure or drift of the bistable or 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 tolerance specified by the calibration procedure, 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 3.3.6-1. 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.

A.1

Condition A applies to the failure of either the R-11 or the R-12 radiation monitor channel. Since the two containment radiation monitors measure different parameters, failure of a single channel may result in delay of the radiation monitoring Function for certain events. However, 7 days is allowed to restore the affected channel because the containment radiation monitoring function is not the primary method of ensuring that 10 CFR limits are not exceeded.

B.1

Condition B applies to all Containment Pressure Relief Line Isolation Functions and addresses the train orientation of these Functions. It also addresses the failure of both radiation monitoring channels, or the inability to restore a single failed channel to OPERABLE status in the time allowed for Required Action A.1.

(continued)

BASES

ACTIONS (continued)

If a train is inoperable, multiple channels are inoperable, or the Required Action and associated Completion Time of Condition A are not met, operation may continue as long as 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 Containment Purge System Isolation Functions and addresses the train orientation of these Functions. It also addresses the failure of both radiation monitoring channels, or the inability to restore a single failed channel to OPERABLE status in the time allowed for Required Action A.1. If a train is inoperable, multiple channels are 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 Purge System isolation valves in their closed position is met or the applicable Conditions of LCO 3.9.3, "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 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 3.3.6-1 determines which SRs apply to which Containment Purge System and Pressure Relief Line Isolation Functions.

SR 3.3.6.1

Performance of the CHANNEL CHECK once every 24 hours ensures that a gross failure of instrumentation has not occurred, and a

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.6.1 (continued)

CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying the instrumentation continues to operate properly between each CHANNEL CALIBRATION. A CHANNEL CHECK for a single channel instrument is satisfied by verification that the sensor or the signal processing equipment has not drifted outside its limits.

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.

SR 3.3.6.2

SR 3.3.6.2 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.

SR 3.3.6.3

A COT is performed every 92 days on each radiation monitoring channel to ensure the entire channel will perform the intended Function. This test verifies the capability of the instrumentation to provide the containment purge system and pressure relief line isolation. The setpoint shall be left consistent with the current unit specific calibration procedure tolerance.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.6.4

SR 3.3.6.4 is the performance of a TADOT. This test is a check every 24 months that includes actuation of the end device (i.e., valve cycles, etc.).

The test also includes trip devices that provide actuation signals directly to the actuation instrumentation, bypassing the analog process control equipment. 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 3.3.6.5

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. Allowable values and setpoints for these Functions are specified in the IP3 Offsite Dose Calculation Manual (Ref. 3).

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

REFERENCES

1. FSAR Chapter 14.

2. Safety Evaluation Report (SER) for IP3 Amendment 175.

3. IP3 Offsite Dose Calculation Manual.

B 3.3 INSTRUMENTATION

B 3.3.7 Control Room Ventilation System (CRVS) Actuation Instrumentation

BASES

BACKGROUND

The CRVS provides an enclosed control room environment from which the unit can be operated following an uncontrolled release of radioactivity. During normal operation, the CRVS provides control room ventilation. Upon receipt of an actuation signal, the CRVS initiates filtered ventilation and pressurization of the control room. This system is described in the Bases for LCO 3.7.11 (Ventilation), "Control Room Ventilation System."

The control room operator can place the CRVS in the 10% incident mode described in the Bases for LCO 3.7.11, by manual mode selector switch in the control room. The CRVS is also actuated by a safety injection (SI) signal. The SI Function is discussed in LCO 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation."

On a Safety Injection signal or high radiation in the Control Room (Radiation Monitor R-1), the CRVS will actuate to the incident mode with outside air makeup (i.e. 10% incident mode). This will cause one of the two filters booster fans to start, the locker room exhaust fan to stop, and CRVS dampers to open or close as necessary to filter incoming outside air and direct approximately 10% of the recirculated air through the filter unit. In the event that the first booster fan fails to start, the second booster fan will start after a predetermined time delay.

If for any reason it is required or desired to operate with 100% recirculated air (e.g., toxic gas condition is identified), the CRVS can be placed in the incident mode with no outside air makeup (i.e. 100% incident mode) by remote manually operated switches. The Firestat detector will also initiate 100% incident mode in the CRVS.

(continued)

BASES (continued)

APPLICABLE SAFETY ANALYSES

The control room must be kept habitable for the operators stationed there during accident recovery and post accident operations.

The CRVS acts to limit the supply of unfiltered outside air to the control room, initiate filtration, and pressurize the control room. These actions are necessary to ensure the control room is kept habitable for the operators stationed there during accident recovery and post accident operations by minimizing the radiation exposure of control room personnel.

In MODES 1, 2, 3, and 4, SI signal actuation ensures initiation of the CRVS during a loss of coolant accident or steam generator tube rupture.

Radiation monitor R-1 is not required for the Operability of the Control Room Ventilation System because control room isolation is initiated by the safety injection signal in MODES 1, 2, 3 and 4 and control room isolation is not required for maintaining radiation exposure within General Design Criteria 19 limits following a fuel handling accident or gas-decay-tank rupture (Ref. 2).

The CRVS does not actuate automatically in response to toxic gases. Separate chlorine, ammonia and oxygen probes are provided to detect the presence of these gases in the outside air intake. Additionally, monitors in the Control Room will detect low oxygen levels and high levels of chlorine and ammonia. The CRVS may be placed in the incident mode with no outside air makeup (i.e. 100% incident mode) to respond to these conditions. Instrumentation for toxic gas monitoring is governed by the IP3 Technical Requirements Manual (TRM) (Ref. 1).

Note that the original CRVS design was not required to meet single failure criteria and, although upgraded from the original design, CRVS does not satisfy all requirements in IEEE-279 for single failure tolerance.

The CRVS actuation instrumentation satisfies Criterion 3 of 10 CFR 50.36.

(continued)

BASES (continued)

LCO

The LCO requirements ensure that instrumentation necessary to actuate the CRVS to the 10% incident mode is OPERABLE.

1. Manual Initiation

The LCO requires two channels OPERABLE because the CRVS mode selector switch has two channels (i.e., one channel for each train). The operator can initiate the CRVS at any time by using the CRVS mode selector switch in the control room. This action will cause actuation of all components in the same manner as the automatic actuation signal.

Each channel includes the common CRVS mode selector switch and the interconnecting wiring to the actuation logic cabinet.

2. Automatic Actuation Logic and Actuation Relays

The LCO requires two trains of Actuation Logic and Relays OPERABLE to ensure that no single random failure can prevent automatic actuation resulting from an SI signal.

Automatic Actuation Logic and Actuation relays are required to be OPERABLE to support the Operability of the function that starts CRVS (i.e., and ESFAS SI initiation signals). The term automatic actuation logic and actuation relays applies to those portions of the circuit that are: 1) common to more than one channel in one train of a single function (i.e., the automatic actuation logic); or, 2) the initiating relay contacts in one train responsible for actuating the equipment and which are common to more than one channel of a single function and more than one function (i.e., the actuation relays). There are two trains of automatic actuation logic and actuation relays for the containment purge system and pressure relief line.

If the SI functions becomes inoperable in such a manner that only the CRVS function is affected, the Conditions applicable to their SI function need not be entered. The less restrictive Actions specified for inoperability of the

(continued)

BASES

LCO (continued)

CRVS Functions specify sufficient compensatory measures for this case.

3. Safety Injection

Refer to LCO 3.3.2, Function 1, for all initiating Functions and requirements.

APPLICABILITY

The CRVS Functions must be OPERABLE in MODES 1, 2, 3 and 4 to ensure a habitable environment for the control room operators.

ACTIONS

A Note has been added to the ACTIONS indicating that separate Condition entry is allowed for each Function. The Conditions of this Specification may be entered independently for each Function listed in Table 3.3.7-1 in the accompanying LCO. 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.

A.1

Condition A applies to the manual channels and the actuation logic train Function of the CRVS.

If one channel or train is inoperable in one or more Functions, 7 days are permitted to restore it to OPERABLE status. The 7 day Completion Time is the same as is allowed if one train of the mechanical portion of the system is inoperable. The basis for this Completion Time is the same as provided in LCO 3.7.11. If the channel/train cannot be restored to OPERABLE status, CRVS must be placed in the emergency radiation protection mode of operation (i.e., the 10% incident mode). This starts both trains of CRVS because a single switch controls both trains. This accomplishes the actuation instrumentation Function and places the unit in a conservative mode of operation.

(continued)

BASES

ACTIONS (continued)

B.1

Condition B applies to the failure of two CRVS actuation trains, or two manual channels. The Required Action is to place CRVS in the 10% incident mode of operation within 72 hours. This starts both trains of CRVS because a single switch controls both trains. This accomplishes the actuation instrumentation Function that may have been lost and places the unit in a conservative mode of operation. The 72 hour Completion Time for placing the CRVS in the 10% incident mode is consistent with the 72 hour Completion Time in ITS 3.7.11. The Completion Time is acceptable because of the low probability of a DBA occurring during this time period. This ensures appropriate limits are placed upon train inoperability as discussed in the Bases for LCO 3.7.11.

C.1 and C.2

Condition C applies when the Required Action and associated Completion Time for Condition A or B have not been met. The unit must be brought to a MODE in which the LCO requirements are not applicable. To achieve this status, the unit must be brought to MODE 3 within 6 hours and MODE 5 within 36 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.

SURVEILLANCE REQUIREMENTS

A Note has been added to the SR Table to clarify that Table 3.3.7-1 determines which SRs apply to which CRVS Actuation Functions.

SR 3.3.7.1

An actuation logic test is performed at a frequency of 31 days on a Staggered Test Basis.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.7.1 (continued)

This test verifies the capability of the instrumentation to provide the CRVS actuation. The Frequency is based on the known reliability of the system and has been shown to be acceptable through operating experience.

SR 3.3.7.2

SR 3.3.7.2 is the performance of a TADOT. This test is a check of the Manual Actuation Functions and is performed every 24 months. Each Manual Actuation Function is tested up to, and including, the end device (i.e., fan starts, damper cycles, etc.).

The Frequency is based on the known reliability of the Function and has been shown to be acceptable through operating experience. The SR is modified by a Note that excludes verification of setpoints during the TADOT. The Functions tested have no setpoints associated with them.

REFERENCES

1. IP3 Technical Requirements Manual.

2. SER for Amendment No. 137 to Facility Operating License DPR-64 for IP3.

B 3.3 INSTRUMENTATION

B 3.3.8 Fuel Storage Building Emergency Ventilation System (FSBEVS) Actuation Instrumentation

BASES

BACKGROUND

The FSBEVS ensures that radioactive materials in the fuel building atmosphere following a fuel handling accident are filtered and adsorbed prior to exhausting to the environment. The system is described in the Bases for LCO 3.7.13, Fuel Storage Building Emergency Ventilation System (FSBEVS). The system initiates filtered ventilation of the fuel storage building automatically following receipt of a high radiation signal from fuel storage building area radiation monitor, R-5.

High radiation levels detected by the fuel storage building area radiation monitor, R-5, initiates fuel storage building isolation and starts the FSBEVS. These actions function to prevent exfiltration of contaminated air by initiating filtered ventilation, which imposes a negative pressure on the fuel storage building. Following an Area Radiation Monitor (R-5) signal or local manual actuation to the emergency mode of operation, the FSBEVS ventilation supply fans stop automatically and the associated ventilation supply dampers close automatically. The charcoal filter face dampers (inlet and outlet dampers) open automatically, if not already open. Additionally, the rolling door closes, if open, and the inflatable seals on the man doors and rolling door are actuated. The FSB exhaust fan continues to operate.

APPLICABLE SAFETY ANALYSES

The FSBEVS ensures that radioactive materials in the fuel storage building atmosphere following a fuel handling accident are filtered and adsorbed prior to being exhausted to the environment when the FSBEVS is aligned and operates as described in the Bases for LCO 3.7.13, Fuel Storage Building Emergency Ventilation

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

System (FSBEVS). This action reduces the radioactive content in the fuel building exhaust following a LOCA or fuel handling accident so that offsite doses remain within the limits specified in 10 CFR 100 (Ref. 1).

The FSBEVS actuation instrumentation satisfies Criterion 3 of 10 CFR 50.36.

LCO

The LCO requirements ensure that instrumentation necessary for local manual and automatic actuation of the FSBEVS is OPERABLE.

Manual and automatic FSBEVS actuation instrumentation consists of one channel of Fuel Storage Building Area Radiation Monitor (R-5) and one channel of manual actuation. Manual actuation from the fan house and automatic FSBEVS actuation instrumentation are Operable when both the Fuel Storage Building Area Radiation Monitor (R-5) signal and manual initiation will cause the realignment of the FSBEVS to the accident mode of operation as described in the Bases for LCO 3.7.13, Fuel Storage Building Emergency Ventilation System (FSBEVS).

The setpoint for Fuel Storage Building Area Radiation Monitor (R-5) is established in accordance with the FSAR (Ref. 2).

APPLICABILITY

The manual FSBEVS initiation must be OPERABLE when moving irradiated fuel assemblies in the fuel storage building, to ensure the FSBEVS operates to remove fission products associated with leakage after a fuel handling accident.

High radiation initiation of the FSBEVS must be OPERABLE in any MODE during movement of irradiated fuel assemblies in the fuel storage building to ensure automatic initiation of the FSBEVS when the potential for a fuel handling accident exists.

(continued)

BASES (continued)

ACTIONS

The most common cause of channel inoperability is outright failure or drift of the bistable or process module sufficient to exceed the tolerance allowed by Reference 2. 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 instrumentation is set up for adjustment to bring it within specification. If the Trip Setpoint is less conservative than the tolerance specified by Reference 2, the channel must be declared inoperable immediately and the appropriate Condition entered.

A.1 and A.2

This condition applies when the manual or automatic FSBEVS initiation capability is inoperable. The Required Action is to immediately place the system in operation as described in the Bases for LCO 3.7.13, FSBEVS. This accomplishes the actuation instrumentation function that may have been lost and places the unit in a accident mode of operation. Alternatively, movement of irradiated fuel assemblies in the fuel storage building must be suspended immediately to eliminate the potential for events that could require FSBEVS actuation. The Completion Time of immediately requires that the Required Action be pursued without delay and in a controlled manner.

SURVEILLANCE REQUIREMENTS

SR 3.3.8.1

Performance of the CHANNEL CHECK once every 24 hours ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying the instrumentation continues to operate properly between each CHANNEL CALIBRATION.

A CHANNEL CHECK for a single channel instrument is satisfied by verification that the sensor or the signal processing equipment has not drifted outside its limit.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.8.1 (continued)

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

SR 3.3.8.2

A COT is performed for both the manual and automatic function once every 92 days to ensure the entire channel will perform the intended function. This test verifies the capability of the instrumentation to provide the FSBEVS actuation. The setpoints shall be left consistent with requirements of Reference 2. The Frequency of 92 days is based on the known reliability of the monitoring equipment and has been shown to be acceptable through operating experience. This test is typically performed in conjunction with SR 3.7.13.4 which verifies OPERABILITY of the activated devices.

SR 3.3.8.3

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 refueling cycle.

REFERENCES

1. 10 CFR 100.11.

2. FSAR, Section 1.3.

B 3.4 REACTOR COOLANT SYSTEM (RCS)

B 3.4.1 RCS Pressure, Temperature, and Flow Departure from Nucleate Boiling (DNB) Limits

BASES

BACKGROUND

These Bases address requirements for maintaining RCS pressure, temperature, and flow rate within limits assumed in the safety analyses. The safety analyses (Ref. 1) of normal operating conditions and anticipated operational occurrences assume initial conditions within the normal steady state envelope. The limits placed on RCS pressure, temperature, and flow rate ensure that the minimum departure from nucleate boiling ratio (DNBR) will be met for each of the transients analyzed.

The RCS pressure limit is consistent with operation within the nominal operational envelope. Pressurizer pressure indications are averaged to come up with a value for comparison to the limit. A lower pressure will cause the reactor core to approach DNB limits.

The RCS coolant average loop temperature limit is consistent with full power operation within the nominal operational envelope. RCS average loop temperature is assumed to be the highest indicated value of the Tavg indicators and this is the value that is compared to the acceptance criteria. A higher average temperature will cause the core to approach DNB limits.

The RCS flow rate normally remains constant during an operational fuel cycle with all pumps running. The minimum RCS flow limit corresponds to that assumed for DNB analyses. RCS flow rate is determined by calculating the average flow rate for each loop and then calculating the sum of these average loop flow rates and this sum of the averages is compared to the acceptance criteria. A lower RCS flow will cause the core to approach DNB limits.

Operation for significant periods of time outside these DNB limits increases the likelihood of a fuel cladding failure in a DNB limited event.

(continued)

BASES

BACKGROUND (continued)

Calculations have shown that reactor heat equivalent to 10% rated power can be removed via the steam generators with natural circulation without violating DNBR limits. This analysis assumed conservative flow resistances including steam generator tube plugging and a locked rotor in each loop (Ref. 1).

APPLICABLE SAFETY ANALYSES

The requirements of this LCO represent the initial conditions for DNB limited transients analyzed in the plant safety analyses (Ref. 1). The safety analyses have shown that transients initiated from the limits of this LCO will result in meeting the DNBR acceptance limit for the RCS DNB parameters. Changes to the unit that could impact these parameters must be assessed for their impact on the DNBR criteria. The transients analyzed include loss of coolant flow events and dropped or stuck rod events. A key assumption for the analysis of these events is that the core power distribution is within the limits of LCO 3.1.6, "Control Bank Insertion Limits"; LCO 3.2.3, "AXIAL FLUX DIFFERENCE (AFD)"; and LCO 3.2.4, "QUADRANT POWER TILT RATIO (QPTR)."

LCO

This LCO specifies limits on the monitored process variables (i.e., pressurizer pressure, RCS average loop temperature, and RCS total flow rate, to ensure the core operates within the limits assumed in the safety analyses. Operating within these limits will result in meeting the DNBR criterion in the event of a DNB limited transient.

The RCS total flow rate limit of 375,600 gpm allows a measurement uncertainty of 2.9% associated with the performance of Reactor coolant System Flow Calculation.

The pressurizer pressure limit of 2205 psig includes the allowance for measurement uncertainty and instrument error. The limit on RCS average loop temperature provides assurance that RCS temperatures are maintained within the normal steady state envelope of operation assumed in the safety analyses performed to

(continued)

BASES

LCO (continued)

support the Vantage + fuel reloads with asymmetric tube plugging among steam generators. A maximum full power Tcold of 547.7°F (including control deadband and measurement uncertainties) was assumed in these safety analyses. A Tavg of 578.3°F assures that a Tcold of 547.7°F is not exceeded at a measured flow of ≥ 375,600 gpm when considering asymmetric tube plugging among steam generators for DNB considerations. Therefore, the LCO limit of 571.5°F for RCS average loop temperature, which is based on meeting analysis assumptions for post-LOCA containment integrity, conservatively ensures that DNBR limits are met.

The RCS DNB parameters satisfy Criterion 2 of 10 CFR 50.36.

APPLICABILITY

In MODE 1, the limits on pressurizer pressure, RCS coolant average temperature, and RCS flow rate must be maintained during steady state operation in order to ensure DNBR criteria will be met in the event of an unplanned loss of forced coolant flow or other DNB limited transient. In all other MODES, the power level is low enough that DNB is not a concern.

A Note has been added to indicate the limit on pressurizer pressure is not applicable during short term operational transients such as a THERMAL POWER ramp increase > 5% RTP per minute or a THERMAL POWER step increase > 10% RTP. These conditions represent short term perturbations where actions to control pressure variations might be counterproductive. Also, since they represent transients initiated from power levels < 100% RTP, an increased DNBR margin exists to offset the temporary pressure variations.

Another set of limits on DNB related parameters is provided in SL 2.1.1, "Reactor Core SLs." Those limits are less restrictive than the limits of this LCO, but violation of a Safety Limit (SL) merits a stricter, more severe Required Action. Should a violation of this LCO occur, the operator must check whether or not an SL may have been exceeded.

(continued)

BASES (continued)

ACTIONS

A.1

RCS pressure and RCS average loop temperature are controllable and measurable parameters. With one or both of these parameters not within LCO limits, action must be taken to restore parameter(s).

RCS total flow rate is not a controllable parameter and is not expected to vary during steady state operation. If the indicated RCS total flow rate is below the LCO limit, power must be reduced, as required by Required Action B.1, to restore DNB margin and eliminate the potential for violation of the accident analysis bounds.

The 2 hour Completion Time for restoration of the parameters provides sufficient time to adjust plant parameters, to determine the cause for the off normal condition, and to restore the readings within limits, and is based on plant operating experience.

B.1

If Required Action A.1 is not met within the associated Completion Time, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 2 within 6 hours. In MODE 2, the reduced power condition eliminates the potential for violation of the accident analysis bounds. The Completion Time of 6 hours is reasonable to reach the required plant conditions in an orderly manner.

SURVEILLANCE REQUIREMENTS

SR 3.4.1.1

Since Required Action A.1 allows a Completion Time of 2 hours to restore parameters that are not within limits, the 12 hour Surveillance Frequency for pressurizer pressure is sufficient to ensure the pressure can be restored to a normal operation, steady

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.4.1.1 (continued)

state condition following load changes and other expected transient operations. Pressurizer pressure indications are averaged to determine the value for comparison to the LCO limit. The 12 hour interval has been shown by operating practice to be sufficient to regularly assess for potential degradation and to verify operation is within safety analysis assumptions.

SR 3.4.1.2

Since Required Action A.1 allows a Completion Time of 2 hours to restore parameters that are not within limits, the 12 hour Surveillance Frequency for RCS average loop temperature is sufficient to ensure the temperature can be restored to a normal operation, steady state condition following load changes and other expected transient operations. RCS average loop temperature is assumed to be the highest indicated value of the Tavg indicators and this is the value that is compared to the acceptance criteria. The 12 hour interval has been shown by operating practice to be sufficient to regularly assess for potential degradation and to verify operation is within safety analysis assumptions.

SR 3.4.1.3

The 12 hour Surveillance Frequency for RCS total flow rate is performed using the installed flow instrumentation. The 12 hour interval has been shown by operating practice to be sufficient to regularly assess potential degradation and to verify operation within safety analysis assumptions.

SR 3.4.1.4

Measurement of RCS total flow rate by performance of a precision calorimetric heat balance once every 24 months verifies that the actual RCS flow rate is greater than or equal to the minimum required RCS flow rate.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.4.1.4 (continued)

The Frequency of 24 months reflects the importance of verifying flow after a refueling outage when the core has been altered, SG tubes plugged or other activities performed, which may have caused an alteration of flow resistance.

This SR is modified by a Note that allows entry into MODE 1, without having performed the SR, and placement of the unit in the best condition for performing the SR. The Note states that the SR is not required to be performed until 24 hours after ≥ 90% RTP. This exception is appropriate since the heat balance requires the plant to be at a minimum of 90% RTP to obtain the stated RCS flow accuracies. The Surveillance shall be performed within 24 hours after reaching 90% RTP.

REFERENCES

1. FSAR, Section 14.

B 3.4 REACTOR COOLANT SYSTEM (RCS)

B 3.4.2 RCS Minimum Temperature for Criticality

BASES

BACKGROUND

This LCO is based upon meeting several major considerations before the reactor can be made critical and while the reactor is critical.

The first consideration is moderator temperature coefficient (MTC), LCO 3.1.3, "Moderator Temperature Coefficient (MTC)." In the transient and accident analyses, the MTC is assumed to be negative (except during physics testing) and the operating temperature is assumed to be within the nominal operating envelope while the reactor is critical. The LCO on minimum temperature for criticality helps ensure the plant is operated consistent with these assumptions.

The second consideration is the protective instrumentation. Because certain protective instrumentation (e.g., excore neutron detectors) can be affected by moderator temperature, a temperature value within the nominal operating envelope is chosen to ensure proper indication and response while the reactor is critical.

The third consideration is the pressurizer operating characteristics. The transient and accident analyses assume that the pressurizer is within its normal startup and operating range (i.e., saturated conditions and steam bubble present). It is also assumed that the RCS temperature is within its normal expected range for startup and power operation. Since the density of the water, and hence the response of the pressurizer to transients, depends upon the initial temperature of the moderator, a minimum value for moderator temperature within the nominal operating envelope is chosen.

The fourth consideration is that the reactor vessel is above its minimum nil ductility reference temperature when the reactor is critical.

(continued)

BASES (continued)

APPLICABLE SAFETY ANALYSES

Although the RCS minimum temperature for criticality is not itself an initial condition assumed in Design Basis Accidents (DBAs), the closely aligned temperature for hot zero power (HZP) is a process variable that is an initial condition of DBAs, such as the rod cluster control assembly (RCCA) withdrawal, RCCA ejection, and main steam line break accidents performed at zero power that either assumes the failure of, or presents a challenge to, the integrity of a fission product barrier.

All low power safety analyses assume initial RCS loop temperatures ≥ the HZP temperature of 547°F (Ref. 1). The minimum temperature for criticality limitation provides a small band, 7°F, for critical operation below HZP. This band allows critical operation below HZP during plant startup and does not adversely affect any safety analyses since the MTC is not significantly affected by the small temperature difference between HZP and the minimum temperature for criticality.

The RCS minimum temperature for criticality satisfies Criterion 2 of 10 CFR 50.36.

LCO

Compliance with the LCO ensures that the reactor will not be made or maintained critical ($k_{eff} \geq 1.0$) at a temperature less than a small band below the HZP temperature, which is assumed in the safety analysis. Failure to meet the requirements of this LCO may produce initial conditions inconsistent with the initial conditions assumed in the safety analysis.

APPLICABILITY

In MODE 1 and MODE 2 with $k_{eff} \geq 1.0$, LCO 3.4.2 is applicable since the reactor can only be critical ($k_{eff} \geq 1.0$) in these MODES.

The special test exception of LCO 3.1.8, "MODE 2 PHYSICS TESTS Exceptions," permits PHYSICS TESTS to be performed at ≤ 5% RTP with RCS loop average temperatures slightly lower than normally allowed so that fundamental nuclear characteristics of the core

(continued)

BASES

APPLICABILITY (continued)

can be verified. In order for nuclear characteristics to be accurately measured, it may be necessary to operate outside the normal restrictions of this LCO. For example, to measure the MTC at beginning of cycle, it is necessary to allow RCS loop average temperatures to fall below $T_{no\ load}$, which may cause RCS loop average temperatures to fall below the temperature limit of this LCO.

ACTIONS

A.1

If the parameters that are outside the limit cannot be restored, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to MODE 2 with k_{eff} < 1.0 within 30 minutes. Rapid reactor shutdown can be readily and practically achieved within a 30 minute period. The allowed time is reasonable, based on operating experience, to reach MODE 2 with k_{eff} < 1.0 in an orderly manner and without challenging plant systems.

SURVEILLANCE REQUIREMENTS

SR 3.4.2.1

RCS loop average temperature is required to be verified at or above 540°F every 30 minutes when T_{avg}-T_{ref} deviation, and low T_{avg} alarm is not reset and any RCS loop T_{avg} < 547°F.

The Note modifies the SR. When any RCS loop average temperature is < 547°F and the T_{avg} - T_{ref} deviation, and low T_{avg} alarm are alarming, RCS loop average temperatures could fall below the LCO requirement without additional warning. The SR to verify RCS loop average temperatures every 30 minutes is frequent enough to prevent the inadvertent violation of the LCO.

REFERENCES

1. FSAR, Section 14.

B 3.4 REACTOR COOLANT SYSTEM (RCS)

B 3.4.3 RCS Pressure and Temperature (P/T) Limits

BASES

BACKGROUND

All components of the RCS are designed to withstand effects of cyclic loads due to system pressure and temperature changes. These loads are introduced by startup (heatup) and shutdown (cooldown) operations, power transients, and reactor trips. This LCO limits the pressure and temperature changes during RCS heatup and cooldown, within the design assumptions and the stress limits for cyclic operation.

LCO 3.4.3, Figure 3.4.3-1, Heatup Limitations for the Reactor Coolant System, Figure, 3.4.3-2, Cooldown Limitations for the Reactor Coolant System, and Figure 3.4.3-3, Hydrostatic and Inservice Leak Testing Limitations for the Reactor Coolant System, contain P/T limit curves for heatup, cooldown, and inservice leak and hydrostatic (ISLH) testing, respectively (Ref. 1).

Each P/T limit curve defines an acceptable region for normal operation. The usual use of the curves is operational guidance during heatup or cooldown maneuvering, when pressure and temperature indications are monitored and compared to the applicable curve to determine that operation is within the allowable region. The happy face icon shown on Figure 3.4.3-1, Figure, 3.4.3-2, and Figure 3.4.3-3, indicates the side of the curve in which operation is permissible. Conversely, the sad face icon indicates the side of the curve in which operation is prohibited.

The LCO establishes operating limits that provide a margin to brittle failure of the reactor vessel and piping of the reactor coolant pressure boundary (RCPB). The vessel is the component most subject to brittle failure, and the LCO limits apply mainly to the vessel. The limits do not apply to the pressurizer, which has different design characteristics and operating functions.

(continued)

BASES

BACKGROUND (continued)

10 CFR 50, Appendix G (Ref. 2), requires the establishment of P/T limits for specific material fracture toughness requirements of the RCPB materials. Reference 2 requires an adequate margin to brittle failure during normal operation, anticipated operational occurrences, and system hydrostatic tests. It mandates the use of the American Society of Mechanical Engineers (ASME) Code, Section III, Appendix G (Ref. 3).

The neutron embrittlement effect on the material toughness is reflected by increasing the nil ductility reference temperature (RT_{NDT}) as exposure to neutron fluence increases.

The actual shift in the RT_{NDT} of the vessel material will be established periodically by removing and evaluating the irradiated reactor vessel material specimens, in accordance with ASTM E 185 (Ref. 4) and Appendix H of 10 CFR 50 (Ref. 5). The operating P/T limit curves will be adjusted, as necessary, based on the evaluation findings and the recommendations of Regulatory Guide 1.99 (Ref. 6).

The P/T limit curves are composite curves established by superimposing limits derived from stress analyses of those portions of the reactor vessel and head that are the most restrictive. At any specific pressure, temperature, and temperature rate of change, one location within the reactor vessel will dictate the most restrictive limit. Across the span of the P/T limit curves, different locations are more restrictive, and, thus, the curves are composites of the most restrictive regions.

The heatup curve represents a different set of restrictions than the cooldown curve because the directions of the thermal gradients through the vessel wall are reversed. The thermal gradient reversal alters the location of the tensile stress between the outer and inner walls.

The criticality limit curve includes the Reference 2 requirement that it be ≥ 40°F above the heatup curve or the cooldown curve, and not less than the minimum permissible temperature for ISLH testing. However, the criticality curve is not operationally limiting; a more restrictive limit exists in LCO 3.4.2, "RCS Minimum Temperature for Criticality."

(continued)

BASES

BACKGROUND (continued)

The consequence of violating the LCO limits is that the RCS has been operated under conditions that can result in brittle failure of the RCPB, possibly leading to a nonisolable leak or loss of coolant accident. In the event these limits are exceeded, an evaluation must be performed to determine the effect on the structural integrity of the RCPB components. The ASME Code, Section XI, Appendix E (Ref. 7), provides a recommended methodology for evaluating an operating event that causes an excursion outside the limits.

APPLICABLE SAFETY ANALYSES

The P/T limits are not derived from Design Basis Accident (DBA) analyses. They are prescribed during normal operation to avoid encountering pressure, temperature, and temperature rate of change conditions that might cause undetected flaws to propagate and cause nonductile failure of the RCPB, an unanalyzed condition. Reference 1 establishes the methodology for determining the P/T limits. Although the P/T limits are not derived from any DBA, the P/T limits are acceptance limits since they preclude operation in an unanalyzed condition.

RCS P/T limits satisfy Criterion 2 of 10 CFR 50.36.

LCO

The two elements of this LCO are:

a. The limit curves for heatup, cooldown, and ISLH testing; and

b. Limits on the rate of change of temperature.

Figure 3.4.3-1, Heatup Limitations for the Reactor Coolant System, Figure, 3.4.3-2, Cooldown Limitations for the Reactor Coolant System, and Figure 3.4.3-3, Hydrostatic and Inservice Leak Testing Limitations for the Reactor Coolant System, contain P/T limit curves for heatup, cooldown, and inservice leak and hydrostatic (ISLH) testing, respectively. These figures specify the maximum RCS pressure for various heatup and cooldown rates at

(continued)

BASES

LCO (continued)

any given reactor coolant temperature. The figures provide the limiting RCS pressure and reactor coolant temperature combination for reactor coolant temperature heatup rates up to 60°F/hr and reactor coolant temperature cooldown rates up to 100°F/hr. Therefore, heatup rates that exceed 60°F/hr and cooldown rates that exceed 100°F/hr are considered not within the limits of this LCO.

The LCO limits apply to all components of the RCS pressure boundary, except the pressurizer. These limits define allowable operating regions and permit a large number of operating cycles while providing a wide margin to nonductile failure.

The limits for the rate of change of temperature control the thermal gradient through the vessel wall and are used as inputs for calculating the heatup, cooldown, and ISLH testing P/T limit curves. Thus, the LCO for the rate of change of temperature restricts stresses caused by thermal gradients and also ensures the validity of the P/T limit curves. Heatup and cooldown limits are specified in hourly increments (i.e., the heatup and cooldown limits are based on the temperature change averaged over a one hour period). Limit lines for cooldown rates between those presented may be obtained by interpolation.

Violating the LCO limits places the reactor vessel outside of the bounds of the stress analyses and can increase stresses in other RCPB components. The consequences depend on several factors, as follows:

a. The severity of the departure from the allowable operating P/T regime or the severity of the rate of change of temperature;

b. The length of time the limits were violated (longer violations allow the temperature gradient in the thick vessel walls to become more pronounced); and

c. The existence, size, and orientation of flaws in the vessel material.

(continued)

BASES (continued)

APPLICABILITY

The RCS P/T limits LCO provides a definition of acceptable operation for prevention of nonductile failure in accordance with 10 CFR 50, Appendix G (Ref. 2). Although the P/T limits were developed to provide guidance for operation during heatup or cooldown (MODES 3, 4, and 5) or ISLH testing, their Applicability is at all times in keeping with the concern for nonductile failure. The limits do not apply to the pressurizer.

During MODES 1 and 2, other Technical Specifications provide limits for operation that can be more restrictive than or can supplement these P/T limits. LCO 3.4.1, "RCS Pressure, Temperature, and Flow Departure from Nucleate Boiling (DNB) Limits"; LCO 3.4.2, "RCS Minimum Temperature for Criticality"; and Safety Limit 2.1, "Safety Limits," also provide operational restrictions for pressure and temperature and maximum pressure. Furthermore, MODES 1 and 2 are above the temperature range of concern for nonductile failure, and stress analyses have been performed for normal maneuvering profiles, such as power ascension or descent.

ACTIONS

A.1 and A.2

Operation outside the P/T limits during MODE 1, 2, 3, or 4 must be corrected so that the RCPB is returned to a condition that has been verified by stress analyses.

The 30 minute Completion Time reflects the urgency of restoring the parameters to within the analyzed range. Most violations will not be severe, and the activity can be accomplished in this time in a controlled manner.

Besides restoring operation within limits, an evaluation is required to determine if RCS operation can continue. The evaluation must verify the RCPB integrity remains acceptable and must be completed before continuing operation. Several methods may be used, including comparison with pre-analyzed transients in the stress analyses, new analyses, or inspection of the components.

(continued)

BASES

ACTIONS

A.1 and A.2 (continued)

ASME Code, Section XI, Appendix E (Ref. 7), may be used to support the evaluation. However, its use is restricted to evaluation of the vessel beltline.

The 72 hour Completion Time is reasonable to accomplish the evaluation. The evaluation for a mild violation is possible within this time, but more severe violations may require special, event specific stress analyses or inspections. A favorable evaluation must be completed before continuing to operate.

Condition A is modified by a Note requiring Required Action A.2 to be completed whenever the Condition is entered. The Note emphasizes the need to perform the evaluation of the effects of the excursion outside the allowable limits. Restoration alone per Required Action A.1 is insufficient because higher than analyzed stresses may have occurred and may have affected the RCPB integrity.

B.1 and B.2

If a Required Action and associated Completion Time of Condition A are not met, the plant must be placed in a lower MODE because either the RCS remained in an unacceptable P/T region for an extended period of increased stress or a sufficiently severe event caused entry into an unacceptable region. Either possibility indicates a need for more careful examination of the event, best accomplished with the RCS at reduced pressure and temperature. In reduced pressure and temperature conditions, the possibility of propagation with undetected flaws is decreased.

If the required restoration activity cannot be accomplished within 30 minutes, Required Action B.1 and Required Action B.2 must be implemented to reduce pressure and temperature.

If the required evaluation for continued operation cannot be accomplished within 72 hours or the results are indeterminate or unfavorable, action must proceed to reduce pressure and temperature as specified in Required Action B.1 and Required

(continued)

BASES

ACTIONS

B.1 and B.2 (continued)

Action B.2. A favorable evaluation must be completed and documented before returning to operating pressure and temperature conditions.

Pressure and temperature are reduced by bringing the plant to MODE 3 within 6 hours and to MODE 5 with RCS pressure < 500 psig within 36 hours. Note that LCO 3.4.12, Low Temperature Overpressure Protection (LTOP), will also apply and may require limits for operation that are more restrictive than or supplement this limit.

The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

C.1 and C.2

Actions must be initiated immediately to correct operation outside of the P/T limits at times other than when in MODE 1, 2, 3, or 4, so that the RCPB is returned to a condition that has been verified by stress analysis.

The immediate Completion Time reflects the urgency of initiating action to restore the parameters to within the analyzed range. Most violations will not be severe, and the activity can be accomplished in this time in a controlled manner.

Besides restoring operation within limits, an evaluation is required to determine if RCS operation can continue. The evaluation must verify that the RCPB integrity remains acceptable and must be completed prior to entry into MODE 4. Several methods may be used, including comparison with pre-analyzed transients in the stress analyses, or inspection of the components.

ASME Code, Section XI, Appendix E (Ref. 7), may be used to support the evaluation. However, its use is restricted to evaluation of the vessel beltline.

(continued)

BASES

ACTIONS

C.1 and C.2 (continued)

Condition C is modified by a Note requiring Required Action C.2 to be completed whenever the Condition is entered. The Note emphasizes the need to perform the evaluation of the effects of the excursion outside the allowable limits. Restoration alone per Required Action C.1 is insufficient because higher than analyzed stresses may have occurred and may have affected the RCPB integrity.

SURVEILLANCE REQUIREMENTS

SR 3.4.3.1

Verification that operation is within the PTLR limits is required every 30 minutes when RCS pressure and temperature conditions are undergoing planned changes. This Frequency is considered reasonable in view of the control room indication available to monitor RCS status. Heatup and cooldown limits are specified in hourly increments (i.e., the heatup and cooldown limits are based on the temperature change averaged over a one hour period). Also, since temperature rate of change limits are specified in hourly increments, 30 minutes permits assessment and correction for minor deviations within a reasonable time.

Surveillance for heatup, cooldown, or ISLH testing may be discontinued when the definition given in the relevant plant procedure for ending the activity is satisfied.

This SR is modified by a Note that only requires this SR to be performed during system heatup, cooldown, and ISLH testing. No SR is given for criticality operations because LCO 3.4.2 contains a more restrictive requirement.

(continued)

BASES (continued)

REFERENCES

1. WCAP-7924-A, July 1972.

2. 10 CFR 50, Appendix G.

3. ASME, Boiler and Pressure Vessel Code, Section III, Appendix G.

4. ASTM E 185-70.

5. 10 CFR 50, Appendix H.

6. Regulatory Guide 1.99, Revision 2, May 1988.

7. ASME, Boiler and Pressure Vessel Code, Section XI, Appendix E.

B 3.4 REACTOR COOLANT SYSTEM (RCS)

B 3.4.4 RCS Loops – MODES 1 and 2

BASES

BACKGROUND

The primary function of the RCS is removal of the heat generated in the fuel due to the fission process, and transfer of this heat, via the steam generators (SGs), to the secondary plant.

The secondary functions of the RCS include:

a. Moderating the neutron energy level to the thermal state, to increase the probability of fission;

b. Improving the neutron economy by acting as a reflector;

c. Carrying the soluble neutron poison, boric acid;

d. Providing a second barrier against fission product release to the environment; and

e. Removing the heat generated in the fuel due to fission product decay following a unit shutdown.

The reactor coolant is circulated through four loops connected in parallel to the reactor vessel, each containing an SG, a reactor coolant pump (RCP), and appropriate flow and temperature instrumentation for both control and protection. The reactor vessel contains the fuel. The SGs provide the heat sink to the isolated secondary coolant. The RCPs circulate the coolant through the reactor vessel and SGs at a sufficient rate to ensure proper heat transfer and prevent fuel damage. This forced circulation of the reactor coolant ensures mixing of the coolant for proper boration and chemistry control.

Calculations have shown that reactor heat equivalent to 10% rated power can be removed via the steam generators with natural circulation without violating DNBR limits. This analysis assumed conservative flow resistances including steam generator tube plugging and a locked rotor in each loop (Ref.1).

(continued)

BASES (continued)

APPLICABLE SAFETY ANALYSES

Safety analyses contain various assumptions for the design bases accident initial conditions including RCS pressure, RCS temperature, reactor power level, core parameters, and safety system setpoints. The important aspect for this LCO is the reactor coolant forced flow rate, which is represented by the number of RCS loops in service.

Both transient and steady state analyses have been performed to establish the effect of flow on the departure from nucleate boiling (DNB). The transient and accident analyses for the plant have been performed assuming four RCS loops are in operation. The majority of the plant safety analyses are based on initial conditions at high core power or zero power. The accident analyses that are most important to RCP operation are the four pump coastdown, single pump locked rotor, single pump (broken shaft or coastdown), and rod withdrawal events (Ref. 1).

Steady state DNB analysis has been performed for the four RCS loop operation. For four RCS loop operation, the steady state DNB analysis, which generates the pressure and temperature Safety Limit (SL) (i.e., the departure from nucleate boiling ratio (DNBR) limit) assumes a maximum power level of 109% RTP. This is the design overpower condition for four RCS loop operation. The value for the accident analysis setpoint of the nuclear overpower (high flux) trip is 108% and is based on an analysis assumption that bounds possible instrumentation errors. The DNBR limit defines a locus of pressure and temperature points that result in a minimum DNBR greater than or equal to the critical heat flux correlation limit.

The plant is designed to operate with all RCS loops in operation to maintain DNBR above the SL, during all normal operations and anticipated transients. By ensuring heat transfer in the nucleate boiling region, adequate heat transfer is provided between the fuel cladding and the reactor coolant.

RCS Loops – MODES 1 and 2 satisfy Criterion 2 of 10 CFR 50.36.

(continued)

BASES (continued)

LCO

The purpose of this LCO is to require an adequate forced flow rate for core heat removal. Flow is represented by the number of RCPs in operation for removal of heat by the SGs. To meet safety analysis acceptance criteria for DNB, four pumps are required at rated power.

An OPERABLE RCS loop consists of an OPERABLE RCP in operation providing forced flow for heat transport and an OPERABLE SG in accordance with the Steam Generator Surveillance Program.

APPLICABILITY

In MODES 1 and 2, the reactor is critical and thus has the potential to produce maximum THERMAL POWER. Thus, to ensure that the assumptions of the accident analyses remain valid, all RCS loops are required to be OPERABLE and in operation in these MODES to prevent DNB and core damage.

The decay heat production rate is much lower than the full power heat rate. As such, the forced circulation flow and heat sink requirements are reduced for lower, noncritical MODES as indicated by the LCOs for MODES 3, 4, and 5.

Operation in other MODES is covered by:

LCO 3.4.5, "RCS Loops – MODE 3";
LCO 3.4.6, "RCS Loops – MODE 4";
LCO 3.4.7, "RCS Loops – MODE 5, Loops Filled";
LCO 3.4.8, "RCS Loops – MODE 5, Loops Not Filled";
LCO 3.9.4, "Residual Heat Removal (RHR) and Coolant Circulation – High Water Level" (MODE 6); and
LCO 3.9.5, "Residual Heat Removal (RHR) and Coolant Circulation – Low Water Level" (MODE 6).

ACTIONS

A.1

If the requirements of the LCO are not met, the Required Action is to reduce power and bring the plant to MODE 3. This lowers power level and thus reduces the core heat removal needs and minimizes the possibility of violating DNB limits.

(continued)

BASES

ACTIONS

A.1 (continued)

The 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 safety systems.

SURVEILLANCE REQUIREMENTS

SR 3.4.4.1

This SR requires verification every 12 hours that each RCS loop is in operation. Verification can be based on flow rate, temperature, or pump status monitoring, which help ensure that forced flow is providing heat removal while maintaining the margin to DNB. The Frequency of 12 hours is sufficient considering other indications and alarms available to the operator in the control room to monitor RCS loop performance.

REFERENCES

1. FSAR, Section 14.

B 3.4 REACTOR COOLANT SYSTEM (RCS)

B 3.4.5 RCS Loops – MODE 3

BASES

BACKGROUND

In MODE 3, the primary function of the reactor coolant is removal of decay heat and transfer of this heat, via the steam generator (SG), to the secondary plant fluid. The secondary function of the reactor coolant is to act as a carrier for soluble neutron poison, boric acid.

The reactor coolant is circulated through four RCS loops, connected in parallel to the reactor vessel, each containing an SG, and a reactor coolant pump (RCP). Appropriate flow, pressure, and temperature instrumentation are available for control, protection, and indication. The reactor vessel contains the fuel. The SGs provide the heat sink. The RCPs circulate the water through the reactor vessel and SGs at a sufficient rate to ensure proper heat transfer and prevent fuel damage.

In MODE 3, RCPs are used to provide forced circulation for heat removal during heatup and cooldown. The MODE 3 decay heat removal requirements are low enough that a single RCS loop with one RCP running is sufficient to remove core decay heat. However, two RCS loops are required to be OPERABLE to ensure redundant capability for decay heat removal.

Calculations have shown that reactor decay heat equivalent to 10% rated power can be removed via the steam generators with natural circulation. This analysis assumed conservative flow resistances including steam generator tube plugging and a lock rotor in each loop (Ref. 1).

APPLICABLE SAFETY ANALYSES

Whenever the reactor trip breakers (RTBs) are in the closed position and the control rod drive mechanisms (CRDMs) are energized, an inadvertent rod withdrawal from subcritical, resulting in a power excursion, is possible. Such a transient

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

could be caused by a malfunction of the rod control system. In addition, the possibility of a power excursion due to the ejection of an inserted control rod is possible with the breakers closed or open. Such a transient could be caused by the mechanical failure of a CRDM.

Therefore, in MODE 3 with RTBs in the closed position and Rod Control System capable of rod withdrawal, uncontrolled control rod withdrawal from subcritical is postulated and requires at least two RCS loops to be OPERABLE and in operation to ensure that the accident analyses limits are met. For those conditions when the Rod Control System is not capable of rod withdrawal, two RCS loops are required to be OPERABLE, but only one RCS loop is required to be in operation to be consistent with MODE 3 accident analyses.

Failure to provide decay heat removal may result in challenges to a fission product barrier. The RCS loops are part of the primary success path that functions or actuates to prevent or mitigate a Design Basis Accident or transient that either assumes the failure of, or presents a challenge to, the integrity of a fission product barrier.

RCS Loops – MODE 3 satisfy Criterion 3 of 10 CFR 50.36.

LCO

The purpose of this LCO is to require that at least two RCS loops be OPERABLE. In MODE 3 with the RTBs in the closed position and Rod Control System capable of rod withdrawal, two RCS loops must be in operation. Two RCS loops are required to be in operation in MODE 3 with RTBs closed and Rod Control System capable of rod withdrawal due to the postulation of a power excursion because of an uncontrolled rod withdrawal. The required number of RCS loops in operation ensures that the Safety Limit criteria will be met for all of the postulated accidents.

With the RTBs in the open position, or the CRDMs de-energized, the Rod Control System is not capable of rod withdrawal;

(continued)

BASES

LCO (continued)

therefore, only one RCS loop in operation is necessary to ensure removal of decay heat from the core and homogenous boron concentration throughout the RCS. An additional RCS loop is required to be OPERABLE to ensure redundant decay heat removal capability.

The Note permits all RCPs to be not be in operation for ≤ 1 hour per 8 hour period. The purpose of the Note is to permit performance of required tests or maintenance that can only be performed with all reactor coolant pumps not in operation. The 1 hour time period specified is acceptable because operating experience has shown that boron stratification is not a problem during this short period with no forced flow.

Utilization of the Note is permitted provided the following conditions are met, along with any other conditions imposed by test or maintenance procedures:

a. No operations are permitted that would dilute the RCS boron concentration, thereby maintaining the margin to criticality. Boron reduction is prohibited because a uniform concentration distribution throughout the RCS cannot be ensured when in natural circulation; and

b. Core outlet temperature is maintained at least 10°F below saturation temperature, so that no vapor bubble may form and possibly cause a natural circulation flow obstruction.

An OPERABLE RCS loop consists of one OPERABLE RCP and one OPERABLE SG in accordance with the Steam Generator Tube Surveillance Program, which has the minimum water level specified in SR 3.4.5.2. An RCP is OPERABLE if it is capable of being powered and is able to provide forced flow if required.

APPLICABILITY

In MODE 3, this LCO ensures forced circulation of the reactor coolant to remove decay heat from the core and to provide proper boron mixing. The most stringent condition of the LCO, that is, two RCS loops OPERABLE and two RCS loops in operation, applies to MODE 3 with RTBs in the closed position. The least stringent

(continued)

BASES

APPLICABILITY (continued)

condition, that is, two RCS loops OPERABLE and one RCS loop in operation, applies to MODE 3 with the RTBs open.

Operation in other MODES is covered by:

LCO 3.4.4, "RCS Loops – MODES 1 and 2";
LCO 3.4.6, "RCS Loops – MODE 4";
LCO 3.4.7, "RCS Loops – MODE 5, Loops Filled";
LCO 3.4.8, "RCS Loops – MODE 5, Loops Not Filled";
LCO 3.9.4, "Residual Heat Removal (RHR) and Coolant Circulation – High Water Level" (MODE 6); and
LCO 3.9.5, "Residual Heat Removal (RHR) and Coolant Circulation – Low Water Level" (MODE 6).

ACTIONS

A.1

If one required RCS loop is inoperable, redundancy for forced circulation heat removal is lost. The Required Action is restoration of the required RCS loop to OPERABLE status within the Completion Time of 72 hours. This time allowance is a justified period to be without the redundant, nonoperating loop because a single loop in operation has a heat transfer capability greater than that needed to remove the decay heat produced in the reactor core and because of the low probability of a failure in the remaining loop occurring during this period.

B.1

If restoration is not possible within 72 hours, the unit must be brought to MODE 4. In MODE 4, the unit may be placed on the Residual Heat Removal System. The additional Completion Time of 12 hours is compatible with required operations to achieve cooldown and depressurization from the existing plant conditions in an orderly manner and without challenging plant systems.

(continued)

BASES

ACTIONS (continued)

C.1 and C.2

If the required RCS loop is not in operation, and the RTBs are closed and Rod Control System is capable of rod withdrawal, the Required Action is either to restore the required RCS loop to operation or to de-energize all CRDMs by opening the RTBs or de-energizing the motor generator (MG) sets. When the RTBs are in the closed position and Rod Control System are capable of rod withdrawal, it is postulated that a power excursion could occur in the event of an inadvertent control rod withdrawal. This mandates having the heat transfer capacity of two RCS loops in operation. If only one loop is in operation, the RTBs must be opened. The Completion Times of 1 hour to restore the required RCS loop to operation or de-energize all CRDMs is adequate to perform these operations in an orderly manner without exposing the unit to risk for an undue time period.

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

If two required RCS loops are inoperable or no RCS loop is in operation, except as during conditions permitted by the Note in the LCO section, all CRDMs must be de-energized by opening the RTBs or de-energizing the MG sets. All operations involving a reduction of RCS boron concentration must be suspended, and action to restore one of the RCS loops to OPERABLE status and operation must be initiated. Boron dilution requires forced circulation for proper mixing, and opening the RTBs or de-energizing the MG sets removes the possibility of an inadvertent rod withdrawal. The immediate Completion Time reflects the importance of maintaining operation for forced circulation heat removal. The action to restore must be continued until one loop is restored to OPERABLE status and operation.

(continued)

BASES (continued)

SURVEILLANCE REQUIREMENTS

SR 3.4.5.1

This SR requires verification every 12 hours that the required loops are in operation. Verification can be based on flow rate, temperature, or pump status monitoring, which ensure that forced flow is providing heat removal. The Frequency of 12 hours is sufficient considering other indications and alarms available to the operator in the control room to monitor RCS loop performance.

SR 3.4.5.2

SR 3.4.5.2 requires verification of SG OPERABILITY. SG OPERABILITY is verified by ensuring that the actual secondary side water level is ≥ 71% wide range for each required loop. Depending on plant conditions, either wide range or narrow range SG level instruments may be used to verify this SR is met. Operators may be required to adjust the indicated level to compensate for the effects of SG temperature. If the SG secondary side actual water level is < 71% wide range, the tubes may become uncovered and the associated loop may not be capable of providing the heat sink for removal of the decay heat. The 12 hour Frequency is considered adequate in view of other indications available in the control room to alert the operator to a loss of SG level.

SR 3.4.5.3

Verification that the required RCPs are OPERABLE ensures that an additional RCP can be placed in operation, if needed, to maintain decay heat removal and reactor coolant circulation. Verification is performed by verifying proper breaker alignment and power availability to the required RCPs.

REFERENCES

1. FSAR 14.1.6.

B 3.4 REACTOR COOLANT SYSTEM (RCS)

B 3.4.6 RCS Loops – MODE 4

BASES

BACKGROUND

In MODE 4, the primary function of the reactor coolant is the removal of decay heat and the transfer of this heat to either the steam generator (SG) secondary side coolant or the component cooling water via the residual heat removal (RHR) heat exchangers. The secondary function of the reactor coolant is to act as a carrier for soluble neutron poison, boric acid.

The reactor coolant is circulated through four RCS loops connected in parallel to the reactor vessel, each loop containing a SG and a reactor coolant pump (RCP). Appropriate flow, pressure, and temperature instrumentation are available for control, protection, and indication. The RCPs and RHR pumps circulate the coolant through the reactor vessel and SGs at a sufficient rate to ensure proper heat transfer and to prevent boric acid stratification.

Each RHR loop consists of one RHR pump and one RHR heat exchanger as well as associated piping and valves to transfer heat between the RHR heat exchanger and the core. Although either RHR heat exchanger may be credited for either RHR loop, one RHR heat exchanger must be OPERABLE for each OPERABLE RHR loop.

In MODE 4, either RCPs or RHR loops can be used to provide forced circulation. The intent of this LCO is to provide forced flow from at least one RCP or one RHR loop for decay heat removal and transport. The flow provided by one RCP loop or RHR loop is adequate for decay heat removal. The other intent of this LCO is to require that two paths be available to provide redundancy for decay heat removal.

When the boron concentration of the RCS is reduced, the process should be uniform to prevent sudden reactivity changes. Mixing of the reactor coolant will be sufficient to maintain a uniform boron concentration if at least one reactor coolant pump or one

(continued)

BASES

BACKGROUND (continued)

residual heat removal pump is running while boron concentration is being changed. The residual heat removal pump will circulate the primary system volume in approximately one half hour. Boron concentration in the pressurizer is not a concern because of the low pressurizer volume and because the pressurizer boron concentration will be higher than that of the rest of the reactor coolant.

Calculations have shown that reactor decay heat equivalent to 10% rated power can be removed via the steam generators with natural circulation. This analysis assumed conservative flow resistances including steam generator tube plugging and a lock rotor in each loop (Ref. 1).

APPLICABLE SAFETY ANALYSES

In MODE 4, RCS circulation is considered in the determination of the time available for mitigation of the accidental boron dilution event. The RCS and RHR loops provide this circulation.

RCS Loops – MODE 4 satisfy Criterion 4 of 10 CFR 50.36.

LCO

The purpose of this LCO is to require that at least two loops be OPERABLE in MODE 4 and that one of these loops be in operation. The LCO allows the two loops that are required to be OPERABLE to consist of any combination of RCS loops and RHR loops. Any one loop in operation provides enough flow to remove the decay heat from the core with forced circulation. An additional loop is required to be OPERABLE to provide redundancy for heat removal.

Note 1 permits all RCPs and RHR pumps to not be in operation for ≤ 1 hour per 8 hour period. The purpose of the Note is to permit performance of required tests or maintenance that can only be performed with no forced circulation. The 1 hour time period is acceptable because operating experience has shown that boron stratification is not a problem during this short period with no forced flow.

(continued)

BASES

LCO (continued)

Utilization of Note 1 is permitted provided the following conditions are met along with any other conditions imposed by test or maintenance procedures:

a. No operations are permitted that would dilute the RCS boron concentration, therefore maintaining the margin to criticality. Boron reduction is prohibited because a uniform concentration distribution throughout the RCS cannot be ensured when in natural circulation; and

b. Core outlet temperature is maintained at least 10°F below saturation temperature, so that no vapor bubble may form and possibly cause a natural circulation flow obstruction.

Note 2 requires that the reactor coolant pump starting requirements of LCO 3.4.12, Low Temperature Overpressure Protection (LTOP), must be met before the start of an RCP with any RCS cold leg temperature less than or equal to the LTOP arming temperature. This restraint is to prevent a low temperature overpressure event due to a thermal transient when an RCP is started.

An OPERABLE RCS loop comprises an OPERABLE RCP and an OPERABLE SG in accordance with the Steam Generator Tube Surveillance Program, which has the minimum water level specified in SR 3.4.6.2.

Similarly for the RHR System, an OPERABLE RHR loop comprises an OPERABLE RHR pump capable of providing forced flow to an OPERABLE RHR heat exchanger. RCPs and RHR pumps are OPERABLE if they are capable of being powered and are able to provide forced flow if required.

APPLICABILITY

In MODE 4, this LCO ensures forced circulation of the reactor coolant to remove decay heat from the core and to provide proper boron mixing. One loop of either RCS or RHR provides sufficient circulation for these purposes. However, two loops consisting of any combination of RCS and RHR loops are required to be OPERABLE to meet single failure considerations.

(continued)

BASES

APPLICABILITY (continued)

Operation in other MODES is covered by:

LCO 3.4.4, "RCS Loops – MODES 1 and 2";
LCO 3.4.5, "RCS Loops – MODE 3";
LCO 3.4.7, "RCS Loops – MODE 5, Loops Filled";
LCO 3.4.8, "RCS Loops – MODE 5, Loops Not Filled";
LCO 3.9.4, "Residual Heat Removal (RHR) and Coolant Circulation – High Water Level" (MODE 6); and
LCO 3.9.5, "Residual Heat Removal (RHR) and Coolant Circulation – Low Water Level" (MODE 6).

ACTIONS

A.1

If one required RCS loop is inoperable and two RHR loops are inoperable, redundancy for heat removal is lost. Action must be initiated to restore a second RCS or RHR loop to OPERABLE status. The immediate Completion Time reflects the importance of maintaining the availability of two paths for heat removal.

B.1

If one required RHR loop is OPERABLE and in operation and there are no RCS loops OPERABLE, an inoperable RCS or RHR loop must be restored to OPERABLE status to provide a redundant means for decay heat removal.

If the parameters that are outside the limits cannot be restored, the unit must be brought to MODE 5 within 24 hours. Bringing the unit to MODE 5 is a conservative action with regard to decay heat removal. With only one RHR loop OPERABLE, redundancy for decay heat removal is lost and, in the event of a loss of the only OPERABLE RHR loop, it would be safer to initiate that loss from MODE 5 ($\leq$ 200°F) rather than MODE 4 (200 to 350°F). The Completion Time of 24 hours is a reasonable time, based on operating experience, to reach MODE 5 from MODE 4 in an orderly manner and without challenging plant systems.

(continued)

BASES

ACTIONS (continued)

C.1 and C.2

If no loop is OPERABLE or in operation, except during conditions permitted by Note 1 in the LCO section, all operations involving a reduction of RCS boron concentration must be suspended and action to restore one RCS or RHR loop to OPERABLE status and in operation must be initiated. Boron dilution requires forced circulation for proper mixing, and the margin to criticality must not be reduced in this type of operation. The immediate Completion Times reflect the importance of maintaining operation for decay heat removal. The action to restore must be continued until one loop is restored to OPERABLE status and operation.

SURVEILLANCE REQUIREMENTS

SR 3.4.6.1

This SR requires verification every 12 hours that one RCS or RHR loop is in operation. Verification includes flow rate, temperature, or pump status monitoring, which help ensure that forced flow is providing heat removal. The Frequency of 12 hours is sufficient considering other indications and alarms available to the operator in the control room to monitor RCS and RHR loop performance.

SR 3.4.6.2

SR 3.4.6.2 requires verification of SG OPERABILITY. SG OPERABILITY is verified by ensuring that the actual secondary side water level is ≥ 71% wide range for each required loop. Depending on plant conditions, either wide range or narrow range SG level instruments may be used to verify this SR is met. Operators may be required to adjust the indicated level to compensate for the effects of SG temperature. If the SG secondary side actual water level is < 71% wide range, the tubes may become uncovered and the associated loop may not be capable of providing the heat sink necessary for removal of decay heat.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.4.6.2 (continued)

The 12 hour Frequency is considered adequate in view of other indications available in the control room to alert the operator to the loss of SG level.

SR 3.4.6.3

Verification that the required pump is OPERABLE ensures that an additional RCS or RHR pump can be placed in operation, if needed, to maintain decay heat removal and reactor coolant circulation. Verification is performed by verifying proper breaker alignment and power available to the required pump and associated support systems. The Frequency of 7 days is considered reasonable in view of other administrative controls available and has been shown to be acceptable by operating experience.

REFERENCES

1. FSAR Chapter 14.1.6.

B 3.4 REACTOR COOLANT SYSTEM (RCS)

B 3.4.7 RCS Loops - MODE 5, Loops Filled

BASES

BACKGROUND

In MODE 5 with the RCS loops filled, the primary function of the reactor coolant is the removal of decay heat and transfer this heat either to the steam generator (SG) secondary side coolant, via natural circulation (Ref. 1), or the component cooling water via the residual heat removal (RHR) heat exchangers. While the principal means for decay heat removal is via the RHR System, the SGs, via natural circulation (Ref. 1), are specified as a backup means for redundancy. Even though the SGs cannot produce steam in this MODE, they are capable of being a heat sink due to their large contained volume of secondary water. As long as the SG secondary side water is at a lower temperature than the reactor coolant, heat transfer will occur. The rate of heat transfer is directly proportional to the temperature difference. The secondary function of the reactor coolant is to act as a carrier for soluble neutron poison, boric acid.

In MODE 5 with RCS loops filled, the reactor coolant is circulated by means of two RHR loops connected to the RCS, each loop containing an RHR heat exchanger, an RHR pump, and appropriate flow and temperature instrumentation for control, protection, and indication. One RHR pump circulates the water through the RCS at a sufficient rate to prevent boric acid stratification. The boron concentration in the pressurizer is of no concern because of the low pressurizer volume and because the pressurizer boron concentration will be higher than the rest of the reactor coolant.

Each RHR loop consists of one RHR pump and one RHR heat exchanger as well as associated piping and valves to transfer heat between the RHR heat exchanger and the core. Although either RHR heat exchanger may be credited for either RHR loop, one RHR heat exchanger must be OPERABLE for each OPERABLE RHR loop.

The number of loops in operation can vary to suit the operational needs. The intent of this LCO is to provide forced flow from at

(continued)

BASES

BACKGROUND (continued)

least one RHR loop for decay heat removal and transport. The flow provided by one RHR loop is adequate for decay heat removal. The other intent of this LCO is to require that a second path be available to provide redundancy for heat removal.

The LCO provides for redundant paths of decay heat removal capability. The first path can be an RHR loop that must be OPERABLE and in operation. The second path can be another OPERABLE RHR loop or maintaining two SGs with secondary side water levels ≥ 71% wide range to provide an alternate method for decay heat removal via natural circulation (Ref. 1).

When using SGs depending on natural circulation as the backup decay heat removal system in Mode 5, consideration should be given to the potential need for the following: (1) the ability to pressurize and control pressure in the RCS, (2) secondary side water level in the SG relied upon for decay heat removal, (3) availability of a supply of feedwater, and (4) availability of an auxiliary feedwater pump capable of injecting into the relied-upon SGs (Ref.1).

During natural circulation, the SGs secondary side water may boil creating the need to release steam through the atmospheric relief valves or other openings that may exist during shutdown conditions. Therefore, consideration should be given to avoiding the potential for pressurization of the SGs secondary side. It is also important to note that during decay heat removal using natural circulation, a MODE change (MODE 5 to MODE 4) could occur due to heat up of the RCS (Ref.1).

APPLICABLE SAFETY ANALYSES

In MODE 5, RCS circulation is considered in the determination of the time available for mitigation of the accidental boron dilution event. The RHR loops provide this circulation.

RCS Loops – MODE 5 (Loops Filled) satisfy Criterion 4 of 10 CFR 50.36.

(continued)

BASES (continued)

LCO

The purpose of this LCO is to require that at least one of the RHR loops be OPERABLE and in operation with an additional RHR loop OPERABLE or two SGs with secondary side water level ≥ 71% wide range. One RHR loop provides sufficient forced circulation to perform the safety functions of the reactor coolant under these conditions. An additional RHR loop is required to be OPERABLE to meet single failure considerations. However, if the standby RHR loop is not OPERABLE, an acceptable alternate method is two SGs with secondary side water level ≥ 71% wide range. Should the operating RHR loop fail, the SGs could be used to remove the decay heat via natural circulation.

Note 1 permits all RHR pumps to not be in operation ≤ 1 hour per 8 hour period. The purpose of the Note is to permit testing and maintenance that can be performed only when in MODE 5 with no forced circulation. This allowance is acceptable because operating experience has shown that boron stratification is not likely during this short period with no forced flow.

Utilization of Note 1 is permitted provided the following conditions are met, along with any other conditions imposed by maintenance or test procedures:

a. No operations are permitted that would dilute the RCS boron concentration, therefore maintaining the margin to criticality. Boron reduction is prohibited because a uniform concentration distribution throughout the RCS cannot be ensured when in natural circulation; and

b. Core outlet temperature is maintained at least 10°F below saturation temperature, so that no vapor bubble may form and possibly cause a natural circulation flow obstruction.

Note 2 allows one RHR loop to be inoperable for a period of up to 2 hours, provided that the other RHR loop is OPERABLE and in operation. This permits periodic surveillance tests to be performed on the inoperable loop during MODE 5 with no forced circulation.

(continued)

BASES

LCO (continued)

Note 3 requires that the reactor coolant pump starting requirements of LCO 3.4.12, Low Temperature Overpressure Protection (LTOP), must be met before the start of a reactor coolant pump (RCP) with an RCS cold leg temperature less than the LTOP arming temperature specified in LCO 3.4.12, Low Temperature Overpressure Protection (LTOP). This restriction is to prevent a low temperature overpressure event due to a thermal transient when an RCP is started.

Note 4 provides for an orderly transition from MODE 5 to MODE 4 during a planned heatup by permitting removal of RHR loops from operation when at least one RCS loop is in operation. This Note provides for the transition to MODE 4 where an RCS loop is permitted to be in operation and replaces the RCS circulation function provided by the RHR loops.

RHR pumps are OPERABLE if they are capable of being powered and are able to provide flow if required. An OPERABLE SG can perform as a heat sink with forced flow or natural circulation when it has an adequate water level and is OPERABLE in accordance with the Steam Generator Tube Surveillance Program.

APPLICABILITY

In MODE 5 with RCS loops filled, this LCO requires forced circulation of the reactor coolant to remove decay heat from the core and to provide proper boron mixing. One loop of RHR provides sufficient circulation for these purposes. However, one additional RHR loop is required to be OPERABLE, or the secondary side water level of at least two SGs is required to be ≥ 71% wide range.

Loops filled is based on the ability to use the SGs as a backup means of decay heat removal. The RCS loops are considered filled provided that pressurizer level has been maintained ≥10%. The loops are also considered filled following the completion of filling and venting the RCS. The ability to pressurize the RCS to ≥100 psig and to control pressure must be established to take credit for use of the SGs as backup decay heat removal. This is to prevent flashing and void formation at the top of the SG tubes

(continued)

BASES

APPLICABILITY (continued)

which may degrade or interrupt the natural circulation flow path (Ref. 1).

Operation in other MODES is covered by:

LCO 3.4.4, "RCS Loops – MODES 1 and 2";
LCO 3.4.5, "RCS Loops – MODE 3";
LCO 3.4.6, "RCS Loops – MODE 4";
LCO 3.4.8, "RCS Loops – MODE 5, Loops Not Filled";
LCO 3.9.4, "Residual Heat Removal (RHR) and Coolant Circulation – High Water Level" (MODE 6); and
LCO 3.9.5, "Residual Heat Removal (RHR) and Coolant Circulation – Low Water Level" (MODE 6).

ACTIONS

A.1 and A.2

If one RHR loop is inoperable and the required SGs have secondary side water level < 71% wide range redundancy for heat removal is lost. Action must be initiated immediately to restore a second RHR loop to OPERABLE status or to restore the required SG secondary side water levels. Either Required Action A.1 or Required Action A.2 will restore redundant heat removal paths. The immediate Completion Time reflects the importance of maintaining the availability of two paths for heat removal.

B.1 and B.2

If no RHR loop is in operation, except during conditions permitted by Note 1, or if no loop is OPERABLE, all operations involving a reduction of RCS boron concentration must be suspended and action to restore one RHR loop to OPERABLE status and in operation must be initiated. To prevent boron dilution, forced circulation is required to provide proper mixing and preserve the margin to criticality in this type of operation. The immediate Completion Times reflect the importance of maintaining operation for heat removal.

(continued)

BASES (continued)

SURVEILLANCE REQUIREMENTS

SR 3.4.7.1

This SR requires verification every 12 hours that the required loop is in operation. Verification includes flow rate, temperature, or pump status monitoring, which help ensure that forced flow is providing heat removal. The Frequency of 12 hours is sufficient considering other indications and alarms available to the operator in the control room to monitor RHR loop performance.

SR 3.4.7.2

Verifying that at least two SGs are OPERABLE by ensuring the secondary side water level ≥ 71% wide range ensures an alternate decay heat removal method, via natural circulation, in the event that the second RHR loop is not OPERABLE. Depending on plant conditions, either wide range or narrow range SG level instruments may be used to verify this SR is met. Operators may be required to adjust the indicated level to compensate for the effects of SG temperature.

If both RHR loops are OPERABLE, this Surveillance is not needed. The 12 hour Frequency is considered adequate in view of other indications available in the control room to alert the operator to the loss of SG level.

SR 3.4.7.3

Verification that a second RHR pump is OPERABLE ensures that an additional pump can be placed in operation, if needed, to maintain decay heat removal and reactor coolant circulation. Verification is performed by verifying proper breaker alignment and power available to the RHR pump. If secondary side water level is ≥ 71% wide range in at least two SGs, this Surveillance is not needed. The Frequency of 7 days is considered reasonable in view of other administrative controls available and has been shown to be acceptable by operating experience.

(continued)

BASES (continued)

REFERENCES

1. NRC Information Notice 95-35, "Degraded Ability of Steam Generators to Remove Decay Heat by Natural Circulation."

B 3.4 REACTOR COOLANT SYSTEM (RCS)

B 3.4.8 RCS Loops - MODE 5, Loops Not Filled

BASES

BACKGROUND

In MODE 5 with the RCS loops not filled, the primary function of the reactor coolant is the removal of decay heat generated in the fuel, and the transfer of this heat to the component cooling water via the residual heat removal (RHR) heat exchangers. The steam generators (SGs) are not available as a heat sink when the loops are not filled. The secondary function of the reactor coolant is to act as a carrier for the soluble neutron poison, boric acid.

In MODE 5 with loops not filled, only RHR pumps can be used for coolant circulation. The number of pumps in operation can vary to suit the operational needs. The intent of this LCO is to provide forced flow from at least one RHR pump for decay heat removal and transport and to require that two loops be available to provide redundancy for heat removal.

Each RHR loop consists of one RHR pump and one RHR heat exchanger as well as associated piping and valves to transfer decay heat between the RHR heat exchanger and the core. Although either RHR heat exchanger may be credited for either RHR loop, one RHR heat exchanger must be OPERABLE for each OPERABLE RHR loop. Separate RHR loops may include common piping and valves.

APPLICABLE SAFETY ANALYSES

In MODE 5, RCS circulation is considered in the determination of the time available for mitigation of the accidental boron dilution event. The RHR loops provide this circulation. The flow provided by one RHR loop is adequate for heat removal and for boron mixing.

RCS loops in MODE 5 (loops not filled) satisfy Criterion 4 of 10 CFR 50.36.

(continued)

BASES (continued)

LCO

The purpose of this LCO is to require that at least two RHR loops be OPERABLE and one of these loops be in operation. An OPERABLE loop is one that has the capability of transferring heat from the reactor coolant at a controlled rate. Heat cannot be removed via the RHR System unless forced flow is used. A minimum of one running RHR pump meets the LCO requirement for one loop in operation. An additional RHR loop is required to be OPERABLE to meet redundancy considerations.

Note 1 permits all RHR pumps to not be in operation for ≤ 15 minutes. The circumstances for stopping both RHR pumps are to be limited to situations when the outage time is short (e.g., station blackout testing) and core outlet temperature is maintained ≥ 10°F below saturation temperature. The Note prohibits boron dilution or draining operations when RHR forced flow is stopped.

Note 2 allows one RHR loop to be inoperable for a period of ≤ 2 hours, provided that the other loop is OPERABLE and in operation. This permits periodic surveillance tests to be performed on the inoperable loop when in MODE 5.

An OPERABLE RHR loop is comprised of an OPERABLE RHR pump capable of providing forced flow to an OPERABLE RHR heat exchanger. RHR pumps are OPERABLE if they are capable of being powered and are able to provide flow if required.

APPLICABILITY

In MODE 5 with loops not filled, this LCO requires core heat removal and coolant circulation by the RHR System.

Operation in other MODES is covered by:

LCO 3.4.4, "RCS Loops – MODES 1 and 2";
LCO 3.4.5, "RCS Loops – MODE 3";
LCO 3.4.6, "RCS Loops – MODE 4";
LCO 3.4.7, "RCS Loops – MODE 5, Loops Filled";
LCO 3.9.4, "Residual Heat Removal (RHR) and Coolant Circulation – High Water Level" (MODE 6); and
LCO 3.9.5, "Residual Heat Removal (RHR) and Coolant Circulation – Low Water Level" (MODE 6).

(continued)

BASES (continued)

ACTIONS

A.1

If only one RHR loop is OPERABLE and in operation, redundancy for RHR is lost. Action must be initiated to restore a second loop to OPERABLE status. The immediate Completion Time reflects the importance of maintaining the availability of two loops for heat removal.

B.1 and B.2

If no required RHR loops are OPERABLE or in operation, except during conditions permitted by Note 1, all operations involving a reduction of RCS boron concentration must be suspended and action must be initiated immediately to restore an RHR loop to OPERABLE status and operation. Boron dilution requires forced circulation for uniform dilution. When required RHR loops are not OPERABLE or in operation, the margin to criticality must not be reduced. The immediate Completion Time reflects the importance of maintaining operation for heat removal. The action to restore must continue until one loop is restored to OPERABLE status and operation.

SURVEILLANCE REQUIREMENTS

SR 3.4.8.1

This SR requires verification every 12 hours that one loop is in operation. Verification includes flow rate, temperature, or pump status monitoring, which help ensure that forced flow is providing heat removal. The Frequency of 12 hours is sufficient considering other indications and alarms available to the operator in the control room to monitor RHR loop performance.

SR 3.4.8.2

Verification that the required number of pumps are OPERABLE ensures that additional pumps can be placed in operation, if needed, to maintain decay heat removal and reactor coolant

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.4.8.2 (continued)

circulation. Verification is performed by verifying proper breaker alignment and power available to the required pumps. The Frequency of 7 days is considered reasonable in view of other administrative controls available and has been shown to be acceptable by operating experience.

REFERENCES None.

B 3.4 REACTOR COOLANT SYSTEM (RCS)

B 3.4.9 Pressurizer

BASES

BACKGROUND

The pressurizer provides a point in the RCS where liquid and vapor are maintained in equilibrium under saturated conditions for pressure control purposes to prevent bulk boiling in the remainder of the RCS. Key functions include maintaining required primary system pressure during steady state operation, and limiting the pressure changes caused by reactor coolant thermal expansion and contraction during normal load transients.

The pressure control components addressed by this LCO include the pressurizer water level, the required heaters, and emergency power supplies. Pressurizer safety valves and pressurizer power operated relief valves are addressed by LCO 3.4.10, "Pressurizer Safety Valves," and LCO 3.4.11, "Pressurizer Power Operated Relief Valves (PORVs)," respectively.

The intent of the LCO is to ensure that a steam bubble exists in the pressurizer prior to power operation to minimize the consequences of potential overpressure transients. The presence of a steam bubble is consistent with analytical assumptions. Relatively small amounts of noncondensible gases can inhibit the condensation heat transfer between the pressurizer spray and the steam, and diminish the spray effectiveness for pressure control.

Electrical immersion heaters, located in the lower section of the pressurizer vessel, keep the water in the pressurizer at saturation temperature and maintain a constant operating pressure. A minimum required available capacity of pressurizer heaters ensures that the RCS pressure can be maintained. The capability to maintain and control system pressure is important for maintaining subcooled conditions in the RCS and ensuring the capability to remove core decay heat by either forced or natural circulation of reactor coolant. Unless adequate heater capacity is available, the hot, high pressure condition cannot be maintained indefinitely and still provide the required subcooling

(continued)

BASES

BACKGROUND (continued)

margin in the primary system. Inability to control the system pressure and maintain subcooling under conditions of natural circulation flow in the primary system could lead to a loss of single phase natural circulation and decreased capability to remove core decay heat.

Pressurizer heaters are powered from either the offsite source or the diesel generators (DGs) through the four 480V vital buses as follows: bus 2A (DG 31) supports 485 kW of pressurizer heaters; bus 3A (DG 31) supports 555 kW of pressurizer heaters; bus 5A (DG 33) supports 485 kW of pressurizer heaters; and, bus 6A (DG 32) supports 277 kW of pressurizer heaters.

APPLICABLE SAFETY ANALYSES

In MODES 1, 2, and 3, the LCO requirement for a steam bubble is reflected implicitly in the accident analyses. Safety analyses performed for lower MODES are not limiting. All analyses performed from a critical reactor condition assume the existence of a steam bubble and saturated conditions in the pressurizer. In making this assumption, the analyses neglect the small fraction of noncondensible gases normally present. The required pressurizer level of ≤ 58.3% is the analytical limit used as an initial condition in the accident analysis. An additional margin should be allowed for instrument error.

Safety analyses presented in the FSAR (Ref. 1) do not take credit for pressurizer heater operation; however, an implicit initial condition assumption of the safety analyses is that the RCS is operating at normal pressure.

The maximum pressurizer water level limit, which ensures that a steam bubble exists in the pressurizer, satisfies Criterion 2 of 10 CFR 50.36. Although the heaters are not specifically used in accident analysis, the need to maintain subcooling in the long term during loss of offsite power, as indicated in NUREG-0737 (Ref. 2), is the reason for providing an LCO.

(continued)

BASES (continued)

LCO

The LCO requirement for the pressurizer to be OPERABLE with water level less than or equal to 58.3%, ensures that a steam bubble exists. The required pressurizer level of ≤ 58.3% is the analytical limit used as an initial condition in the accident analysis. An additional margin of approximately 7% should be allowed for instrument error (i.e., the indicated level should not exceed 51.3%).

Limiting the LCO maximum operating water level preserves the steam space for pressure control. The LCO has been established to ensure the capability to establish and maintain pressure control for steady state operation and to minimize the consequences of potential overpressure transients. Requiring the presence of a steam bubble is also consistent with analytical assumptions.

The LCO requires two groups of OPERABLE pressurizer heaters, each with a capacity ≥ 150 kW, capable of being powered from either the offsite power source or the emergency power supply. Each of the 2 groups of pressurizer heaters should be powered from a different DG to ensure that the minimum required capacity of 150 kW can be energized during a loss of offsite power condition assuming the failure of a single DG. The minimum heater capacity required is sufficient to maintain the RCS near normal operating pressure when accounting for heat losses through the pressurizer insulation. By maintaining the pressure near the operating conditions, a wide margin to subcooling can be obtained in the loops. The value of 150 kW is sufficient to maintain pressure and is dependent on the heat losses.

APPLICABILITY

The need for pressure control is most pertinent when core heat can cause the greatest effect on RCS temperature, resulting in the greatest effect on pressurizer level and RCS pressure control. Thus, applicability has been designated for MODES 1 and 2. The applicability is also provided for MODE 3. The purpose is to prevent solid water RCS operation during heatup and cooldown to avoid rapid pressure rises caused by normal operational perturbation, such as reactor coolant pump startup.

In MODES 1, 2, and 3, there is need to maintain the availability of pressurizer heaters, capable of being powered from an

(continued)

BASES

APPLICABILITY (continued)

emergency power supply. In the event of a loss of offsite power, the initial conditions of these MODES give the greatest demand for maintaining the RCS in a hot pressurized condition with loop subcooling for an extended period. For MODE 4, 5, or 6, it is not necessary to control pressure (by heaters) to ensure loop subcooling for heat transfer when the Residual Heat Removal (RHR) System is in service, and therefore, the LCO is not applicable.

ACTIONS

A.1 and A.2

Pressurizer water level control malfunctions or other plant evolutions may result in a pressurizer water level above the nominal upper limit, even with the plant at steady state conditions.

If the pressurizer water level is not within the limit, action must be taken to place the plant in a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to MODE 3, with the reactor trip breakers open, within 6 hours and to MODE 4 within 12 hours. This takes the unit out of the applicable MODES.

The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

B.1

If one required group of pressurizer heaters is inoperable, restoration is required within 72 hours. The Completion Time of 72 hours is reasonable considering that the redundant heater group is still available and the low probability of an event during this period. Pressure control may be maintained during this time using remaining heaters.

C.1 and C.2

If one group of pressurizer heaters are inoperable and cannot be restored in the allowed Completion Time of Required Action B.1, the plant must be brought to a MODE in which the LCO does not

(continued)

BASES

ACTIONS

C.1 and C.2 (continued)

apply. To achieve this status, the plant must be brought to MODE 3 within 6 hours and to MODE 4 within 12 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE REQUIREMENTS

SR 3.4.9.1

This SR requires that during steady state operation, pressurizer level is maintained below the nominal upper limit to provide a minimum space for a steam bubble. The Surveillance is performed by observing the indicated level. The Frequency of 12 hours has been shown by operating practice to be sufficient to regularly assess level for any deviation and verify that operation is within safety analyses assumptions of ensuring that a steam bubble exists in the pressurizer. Alarms are also available for early detection of abnormal level indications.

SR 3.4.9.2

The SR is satisfied when the power supplies are demonstrated to be capable of producing the minimum power and the associated pressurizer heaters are verified to be at their design rating. This may be done separately by testing the power supply output and by performing an electrical check on heater element continuity and resistance. The Frequency of 24 months is considered adequate to detect heater degradation and has been shown by operating experience to be acceptable.

REFERENCES

1. FSAR, Section 14.

2. NUREG-0737, November 1980.

B 3.4 REACTOR COOLANT SYSTEM (RCS)

B 3.4.10 Pressurizer Safety Valves

BASES

BACKGROUND

The pressurizer safety valves provide, in conjunction with the Reactor Protection System, overpressure protection for the RCS. The pressurizer safety valves are totally enclosed spring loaded, self actuated valves with backpressure compensation. The safety valves are designed to prevent the system pressure from exceeding the system Safety Limit (SL), 2735 psig, which is 110% of the design pressure.

Because the safety valves are totally enclosed and self actuating, they are considered independent components. The relief capacity for each valve, 420,000 lb/hr, is based on postulated overpressure transient conditions resulting from a complete loss of steam flow to the turbine without a direct reactor trip or any other control. This event results in the maximum surge rate into the pressurizer, which specifies the minimum relief capacity for the safety valves. The discharge flow from the pressurizer safety valves is directed to the pressurizer relief tank. This discharge flow is indicated by an increase in temperature downstream of the pressurizer safety valves; or an increase in the pressurizer relief tank temperature or level; or actuation of acoustic monitors.

Overpressure protection is required in MODES 1, 2, 3, 4, and 5; however, in MODE 4, with one or more RCS cold leg temperatures ≤ 319°F (i.e., less than the LTOP arming temperature specified in LCO 3.4.12) and MODE 5 and MODE 6 with the reactor vessel head on, overpressure protection is provided by operating procedures and by meeting the requirements of LCO 3.4.12, "Low Temperature Overpressure Protection (LTOP) System."

The upper and lower pressure limits are based on the ± 1% tolerance requirement (Ref. 1) for lifting pressures above 1000 psig. The lift setting is for the ambient conditions associated with MODES 1, 2, and 3. This requires either that the valves be set hot or that a correlation between hot and cold settings be established.

(continued)

BASES

BACKGROUND (continued)

Although the pressurizer safety valves must be set to ± 1% during the Surveillance, the pressurizer safety valves satisfy safety analysis assumptions and meet ASME Code requirements if the setpoint is determined to be ± 3% at the end of the surveillance interval. Therefore, the pressurizer safety valve setpoint is ± 3% for OPERABILITY; however, the valves must be reset to ± 1% during the Surveillance to allow for drift.

The pressurizer safety valves are part of the primary success path and mitigate the effects of postulated accidents. OPERABILITY of the safety valves ensures that the RCS pressure will be limited to 110% of design pressure. The consequences of exceeding the American Society of Mechanical Engineers (ASME) pressure limit (Ref. 1) could include damage to RCS components, increased leakage, or a requirement to perform additional stress analyses prior to resumption of reactor operation.

APPLICABLE SAFETY ANALYSES

All accident and safety analyses in the FSAR (Ref. 2) that require safety valve actuation assume operation of three pressurizer safety valves to limit increases in RCS pressure. No single failure is assumed for spring loaded safety valves designed in accordance with the ASME Boiler and Pressure Vessel Code. The overpressure protection analysis (Ref. 3) is also based on operation of three safety valves. Accidents that could result in overpressurization if not properly terminated include:

a. Uncontrolled rod withdrawal from full power;

b. Loss of reactor coolant flow;

c. Loss of external electrical load;

d. Loss of normal feedwater;

e. Loss of all AC power to station auxiliaries; and

f. Locked rotor.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

Detailed analyses of the above transients are contained in Reference 2. Safety valve actuation may be required in events a, b, c, e, and f (above) to limit the pressure increase. Compliance with this LCO is consistent with the design bases and accident analyses assumptions. The pressurizer safety valves satisfy safety analysis assumptions and meet ASME Code requirements if the setpoint is determined to be ± 3% at the end of the surveillance interval.

Pressurizer safety valves satisfy Criterion 3 of 10 CFR 50.36.

LCO

The three pressurizer safety valves are set to open at the RCS design pressure (2500 psia), and within the ASME specified tolerance, to avoid exceeding the maximum design pressure SL, to maintain accident analyses assumptions, and to comply with ASME requirements. The upper and lower pressure tolerance limits are based on the ± 1% tolerance requirements (Ref. 1) for lifting pressures above 1000 psig.

The pressurizer safety valve setpoint is ± 3% of the nominal 2485 psig setpoint for OPERABILITY; however, the valves must be reset to ± 1% of the nominal 2485 psig setpoint during the Surveillance to allow for drift during the SR interval.

The limit protected by this Specification is the reactor coolant pressure boundary (RCPB) SL of 110% of design pressure. Inoperability of one or more valves could result in exceeding the SL if a transient were to occur. The consequences of exceeding the ASME pressure limit could include damage to one or more RCS components, increased leakage, or additional stress analysis being required prior to resumption of reactor operation.

APPLICABILITY

In MODES 1, 2, and 3, and portions of MODE 4 above the LTOP arming temperature, OPERABILITY of three valves is required because the combined capacity is required to keep reactor coolant pressure below 110% of its design value during certain accidents.

(continued)

BASES

APPLICABILITY (continued)

MODE 3 and portions of MODE 4 are conservatively included, although the listed accidents may not require the safety valves for protection.

The LCO is not applicable in MODE 4 when any RCS cold leg temperature is ≤ 319°F (i.e., when LCO 3.4.12 is applicable) or in MODE 5 because LTOP is provided. Overpressure protection is not required in MODE 6 with reactor vessel head removed.

The Note allows entry into MODES 3 and 4 with the lift settings outside the LCO limits. This permits testing and examination of the safety valves at high pressure and temperature near their normal operating range, but only after the valves have had a preliminary cold setting. The cold setting gives assurance that the valves are OPERABLE near their design condition. Only one valve at a time will be removed from service for testing. The 54 hour exception is based on 18 hour outage time for each of the three valves. The 18 hour period is derived from industry experience that hot testing can be performed in this timeframe.

ACTIONS

A.1

With one pressurizer safety valve inoperable, restoration must take place within 15 minutes. The Completion Time of 15 minutes reflects the importance of maintaining the RCS overpressure protection. An inoperable safety valve coincident with an RCS overpressure event could challenge the integrity of the pressure boundary.

B.1 and B.2

If the Required Action of A.1 cannot be met within the required Completion Time or if two or more pressurizer safety valves are inoperable, the plant must be brought to a MODE in which the requirement does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 4 with any RCS cold leg temperature ≤ 319°F (i.e., where LCO 3.4.12 is applicable) within 12 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner

(continued)

BASES

ACTIONS

B.1 and B.2 (continued)

and without challenging plant systems. With any of the RCS cold leg temperatures ≤ 319°F (i.e., when LCO 3.4.12 is applicable) overpressure protection is provided by LTOP. The change from MODE 1, 2, or 3 to MODE 4 reduces the RCS energy (core power and pressure), lowers the potential for large pressurizer insurges, and thereby removes the need for overpressure protection by three pressurizer safety valves.

SURVEILLANCE REQUIREMENTS

SR 3.4.10.1

SRs are specified in the Inservice Testing Program. Pressurizer safety valves are to be tested in accordance with the requirements of Section XI of the ASME Code (Ref. 4), which provides the activities and Frequencies necessary to satisfy the SRs. No additional requirements are specified.

The pressurizer safety valve setpoint is ± 3% for OPERABILITY; however, the valves are reset to ± 1% during the Surveillance to allow for drift.

REFERENCES

1. ASME, Boiler and Pressure Vessel Code, Section III.

2. FSAR, Chapter 14.

3. WCAP-7769, Rev. 1, June 1972.

4. ASME, Boiler and Pressure Vessel Code, Section XI.

B 3.4 REACTOR COOLANT SYSTEM (RCS)

B 3.4.11 Pressurizer Power Operated Relief Valves (PORVs)

BASES

BACKGROUND

The pressurizer is equipped with two types of devices for pressure relief: pressurizer safety valves and PORVs. The PORVs are nitrogen operated valves that are controlled to open at a specific set pressure when the pressurizer pressure increases and close when the pressurizer pressure decreases. The PORVs may also be manually operated from the control room.

Block valves, which are normally open, are located between the pressurizer and the PORVs. The block valves are used to isolate the PORVs in case of excessive leakage or a stuck open PORV. Block valve closure is accomplished manually using controls in the control room. A stuck open PORV is, in effect, a small break loss of coolant accident (LOCA). As such, block valve closure terminates the RCS depressurization and coolant inventory loss.

The PORVs and their associated block valves may be used by plant operators to depressurize the RCS to recover from certain transients if normal and alternate pressurizer spray is not available. Additionally, the series arrangement of the PORVs and their block valves permit performance of surveillances on the valves during power operation.

The PORVs may also be used for feed and bleed core cooling in the case of multiple equipment failure events that are not within the design basis, such as a total loss of feedwater.

Electrical power needed to support the PORVs, their block valves, and their controls is supplied from the vital buses that normally receive power from offsite power sources, but is also capable of being supplied from emergency power sources in the event of a loss of offsite power. Two PORVs and their associated block valves are powered from two separate safety trains (Ref. 1).

(continued)

BASES

BACKGROUND (continued)

The plant has two PORVs, each having a design relief capacity of 179,000 lb/hr at 2335 psig. The functional design of the PORVs is based on maintaining pressure below the Pressurizer Pressure – High reactor trip setpoint following a step reduction of 50% of full load with steam dump and automatic reactor control operation. In addition, the PORVs minimize challenges to the pressurizer safety valves and also may be used for low temperature overpressure protection (LTOP). See LCO 3.4.12, "Low Temperature Overpressure Protection (LTOP) System."

APPLICABLE SAFETY ANALYSES

Plant operators employ the PORVs to depressurize the RCS in response to certain plant transients if normal and alternate pressurizer spray are not available. For the Steam Generator Tube Rupture (SGTR) event, the safety analysis assumes that manual operator actions are required to mitigate the event. A loss of offsite power is assumed to accompany the event, and thus, normal pressurizer spray is unavailable to reduce RCS pressure. The PORVs or auxiliary spray are assumed to be used for RCS depressurization, which is one of the steps performed to equalize the primary and secondary pressures in order to terminate the primary to secondary break flow and the radioactive releases from the affected steam generator.

The PORVs are modeled in safety analyses for events that result in increasing RCS pressure for which departure from nucleate boiling ratio (DNBR) criteria are critical (Ref. 2). By assuming PORV manual actuation, the DNBR calculation is more conservative although not required to meet safety limits. As such, this actuation is not required to mitigate these events, and PORV automatic operation is not an assumed safety function.

Pressurizer PORVs satisfy Criterion 3 of 10 CFR 50.36.

LCO

The LCO requires the PORVs and their associated block valves to be OPERABLE for manual operation to mitigate the effects associated with an SGTR.

(continued)

BASES

LCO (continued)

By maintaining two PORVs and their associated block valves OPERABLE, the single failure criterion is satisfied. An OPERABLE block valve may be either open, or closed and energized with the capability to be opened, since the required safety function is accomplished by manual operation. Although typically open to allow PORV operation, the block valves may be OPERABLE when closed to isolate the flow path of an inoperable PORV that is capable of being manually cycled (e.g., as in the case of excessive PORV leakage). Similarly, isolation of an OPERABLE PORV does not render that PORV or block valve inoperable provided the relief function remains available with manual action.

An OPERABLE PORV is required to be capable of manually opening and closing, and not experiencing excessive seat leakage. Excessive seat leakage, although not associated with a specific acceptance criteria, exists when conditions dictate closure of the block valve to limit leakage. Satisfying the LCO helps minimize challenges to fission product barriers.

APPLICABILITY

In MODES 1, 2, and 3, the PORV and its block valve are required to be OPERABLE to limit the potential for a small break LOCA through the flow path. The most likely cause for a PORV small break LOCA is a result of a pressure increase transient that causes the PORV to open. Imbalances in the energy output of the core and heat removal by the secondary system can cause the RCS pressure to increase to the PORV opening setpoint. The most rapid increases will occur at the higher operating power and pressure conditions of MODES 1 and 2. The PORVs are also required to be OPERABLE in MODES 1, 2, and 3 for manual actuation to mitigate a steam generator tube rupture event.

Pressure increases are less prominent in MODE 3 because the core input energy is reduced, but the RCS pressure is high. Therefore, the LCO is applicable in MODES 1, 2, and 3. The LCO is not applicable in MODE 4, 5 and 6 with the reactor vessel head in place when both pressure and core energy are decreased and the pressure surges become much less significant. LCO 3.4.12 addresses the PORV requirements in these MODES.

(continued)

BASES (continued)

ACTIONS

Note 1 has been added to clarify that all pressurizer PORVs are treated as separate entities, each with separate Completion Times (i.e., the Completion Time is on a component basis). The exception for LCO 3.0.4, Note 2, permits entry into MODES 1, 2, and 3. This exception to LCO requirements is normally used to perform cycling of the PORVs or block valves to verify their OPERABLE status because testing is not performed in lower MODES.

A.1

PORVs may be inoperable and capable of being manually cycled (e.g., excessive seat leakage). In this condition, either the PORVs must be restored or the flow path isolated within 1 hour. The associated block valve is required to be closed, but power must be maintained to the associated block valve, since removal of power would render the block valve inoperable. This permits operation of the plant until the next refueling outage (MODE 6) so that maintenance can be performed on the PORVs to eliminate the problem condition.

Quick access to the PORV for pressure control can be made when power remains on the closed block valve. The Completion Time of 1 hour is based on plant operating experience that has shown that minor problems can be corrected or closure accomplished in this time period.

B.1, B.2, and B.3

If one PORV is inoperable and not capable of being manually cycled, it must be either restored, or isolated by closing the associated block valve and removing the power to the associated block valve. The Completion Time of 1 hour is reasonable, based on challenges to the PORVs during this time period, and provide the operator adequate time to correct the situation. If the inoperable valve cannot be restored to OPERABLE status, it must be isolated within the specified time. Because there is at least one PORV that remains OPERABLE, an additional 7 days is provided to restore the inoperable PORV to OPERABLE status. If the PORV

(continued)

BASES

ACTIONS

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

cannot be restored within this additional time, the plant must be brought to a MODE in which the LCO does not apply, as required by Condition D.

C.1 and C.2

If one block valve is inoperable, then it is necessary to either restore the block valve to OPERABLE status within the Completion Time of 1 hour or place the associated PORV in the closed position (i.e., switch in manual control). The prime importance for the capability to close the block valve is to isolate a stuck open PORV. Therefore, if the block valve cannot be restored to OPERABLE status within 1 hour, the Required Action is to place the PORV in manual control to preclude its automatic opening for an overpressure event and to avoid the potential for a stuck open PORV at a time that the block valve is inoperable. The Completion Time of 1 hour is reasonable, based on the small potential for challenges to the system during this time period, and provides the operator time to correct the situation. Because at least one PORV remains OPERABLE, the operator is permitted a Completion Time of 7 days to restore the inoperable block valve to OPERABLE status. The time allowed to restore the block valve is based upon the Completion Time for restoring an inoperable PORV in Condition B, since the PORVs may not be capable of mitigating an overpressure event if the inoperable block valve is not full open. If the block valve is restored within the Completion Time of 7 days, the power will be restored to the PORV. If it cannot be restored within this additional time, the plant must be brought to a MODE in which the LCO does not apply, as required by Condition D.

D.1 and D.2

If the Required Action of Condition A, B, or C is not met, then the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 4 within 12 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full

(continued)

BASES

ACTIONS

D.1 and D.2 (continued)

power conditions in an orderly manner and without challenging plant systems. In MODES 4 and 5, automatic PORV OPERABILITY may be required. See LCO 3.4.12.

E.1, E.2, E.3 and E.4

If more than one PORV is inoperable and not capable of being manually cycled, it is necessary to either restore at least one valve within the Completion Time of 1 hour or isolate the flow path by closing and removing the power to the associated block valves. The Completion Time of 1 hour is reasonable, based on the small potential for challenges to the system during this time and provides the operator time to correct the situation. If no PORVs are restored within the Completion Time, then the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 4 within 12 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems. In MODES 4 and 5, maintaining PORV OPERABILITY may be required. See LCO 3.4.12.

F.1 and F.2

If more than one block valve is inoperable, it is necessary to either restore the block valves within the Completion Time of 1 hour, or place the associated PORVs in manual control (i.e., closed position) and restore at least one block valve within 2 hours. The Completion Times are reasonable, based on the small potential for challenges to the system during this time and provide the operator time to correct the situation.

G.1 and G.2

If the Required Actions of Condition F are not met, then the plant must be brought to a MODE in which the LCO does not apply.

(continued)

BASES

ACTIONS

G.1 and G.2 (continued)

To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 4 within 12 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems. In MODES 4 and 5, automatic PORV OPERABILITY may be required. See LCO 3.4.12.

SURVEILLANCE REQUIREMENTS

SR 3.4.11.1

Block valve cycling verifies that the valve(s) can be opened and closed if needed. The basis for the Frequency of 92 days is the ASME Code, Section XI (Ref. 3). If the block valve is closed to isolate a PORV that is capable of being manually cycled, the OPERABILITY of the block valve is important because opening the block valve is necessary to permit the PORV to be used for manual control of reactor pressure. If the block valve is closed to isolate an inoperable PORV that is not capable of being manually cycled, the maximum Completion Time to restore the PORV and open the block valve is 7 days, which is well within the allowable limits (25%) to extend the block valve Frequency of 92 days. Furthermore, these test requirements would be completed by the reopening of a recently closed block valve upon restoration of the PORV to OPERABLE status.

The Note modifies this SR by stating that it is not required to be met with the block valve closed, in accordance with the Required Action of this LCO.

SR 3.4.11.2

SR 3.4.11.2 requires a complete cycle of each PORV. Operating a PORV through one complete cycle ensures that the PORV can be manually actuated for mitigation of an SGTR. The Frequency of 24 months is based on a typical refueling cycle and industry accepted practice.

(continued)

BASES (continued)

REFERENCES

1. Regulatory Guide 1.32, February 1977.

2. FSAR, Section 14.

3. ASME, Boiler and Pressure Vessel Code, Section XI.

B 3.4 REACTOR COOLANT SYSTEM (RCS)

B 3.4.12 Low Temperature Overpressure Protection (LTOP)

BASES

BACKGROUND

LTOP is established to limit RCS pressure at low temperatures so the integrity of the reactor coolant pressure boundary (RCPB) is not compromised by violating the pressure and temperature (P/T) limits of 10 CFR 50, Appendix G (Ref. 1). The reactor vessel is the limiting RCPB component for demonstrating such protection. LCO 3.4.12, Figure 3.4.12-1 provides the maximum allowable nominal actuation logic setpoints for the power operated relief valves (PORVs) and the maximum RCS pressure for the coldest existing RCS cold leg temperature during cooldown, shutdown, and heatup to meet the Reference 1 requirements during the LTOP MODES.

The reactor vessel material is less tough at low temperatures than at normal operating temperature. As the vessel neutron exposure accumulates, the material toughness decreases and becomes less resistant to pressure stress at low temperatures (Ref. 2). RCS pressure, therefore, is maintained low at low temperatures and is increased only as temperature is increased.

The potential for vessel overpressurization is most acute when the RCS is water solid, occurring only while shutdown because a pressure fluctuation can occur more quickly than an operator can react to relieve the condition. Exceeding the RCS P/T limits by a significant amount could cause brittle cracking of the reactor vessel. LCO 3.4.3, "RCS Pressure and Temperature (P/T) Limits," requires administrative control of RCS pressure and temperature during heatup and cooldown to prevent exceeding the limits in Figure 3.4.12-1 .

When the RHR System is isolated from the RCS, the RHR System is protected from overpressure by two spring loaded relief valves (SI-733A and SI-733B). When the RHR System is not isolated from the RCS, the RHR System is protected from overpressure by spring loaded relief valve (i.e., AC-1836) which has sufficient capacity to accommodate all 3 charging pumps. However, this relief valve

(continued)

BASES

BACKGROUND (continued)

does not have sufficient capacity to ensure that the RHR system does not exceed design pressure limits during a mass addition resulting from an inadvertent injection of one or more high head safety injection (HHSI) pumps. Therefore, LTOP requirements are used to protect the RHR System whenever the RHR System is not isolated from the RCS.

This LCO provides RCS overpressure protection by limiting maximum coolant input capability and having adequate pressure relief capacity. Limiting coolant input capability is achieved by not permitting any High Head Safety Injection (HHSI) pumps to be capable of injection into the RCS and isolating the accumulators. The pressure relief capacity requires either two redundant power operated relief valves (PORVs) or a depressurized RCS and an RCS vent of sufficient size. One PORV or the open RCS vent is sufficient to provide overpressure protection to terminate an increasing pressure event. Alternately, if redundant PORVs are not Operable or an RCS vent cannot be established, LTOP protection may be established by limiting the pressurizer level to within limits specified in Figure 3.4.12-2 and Figure 3.4.12-3 consistent with the number of charging pumps and number of high head safety injection (HHSI) pumps capable of injecting into the RCS. This approach is acceptable because pressurizer level can be maintained such that it will either accommodate any anticipated pressure surge or allow operators time to react to any unanticipated pressure surge. When pressurizer level is used to satisfy LTOP requirements, operator action is assumed to terminate the unplanned HHSI pump injection within 10 minutes.

With high pressure coolant input capability limited, the ability to create an overpressure condition by coolant addition is restricted. The LCO does not require the makeup control system deactivated or the safety injection (SI) actuation circuits blocked. Due to the lower pressures in the LTOP MODES and the expected core decay heat levels, the makeup system can provide adequate flow via the makeup control valve. There is no restriction on the status of charging pumps when LTOP is established using either a PORV or an RCS vent. If conditions require the use of more than one HHSI pump for makeup

(continued)

BASES

BACKGROUND (continued)

in the event of loss of inventory, then pumps can be made available through manual actions. Charging pumps and low pressure injection systems are available to provide makeup even when LTOP requirements are applicable.

When configured to provide low temperature overpressure protection, the PORVs are part of the Overpressure Protection System (OPS). LTOP for pressure relief can consist of either the OPS (two PORVs with reduced lift settings), or a depressurized RCS and an RCS vent of sufficient size. Two PORVs are required for redundancy. One PORV has adequate relieving capability to keep from overpressurization for the required coolant input capability.

PORV Requirements

The Overpressure Protection System (OPS) provides the low temperature overpressure protection by controlling the Power Operated Relief Valves (PORVs) and their associated block valves with pressure setpoints that vary with RCS cold leg temperature. Specifically, cold leg temperature signals from three RCS loops are supplied to three associated function generators that calculate the maximum RCS pressures allowed at those temperatures. The maximum RCS pressure limits at any RCS temperature correspond to the 10 CFR 50, Appendix G, limit curve maintained in the Pressure and Temperature Limits Report and are used as the OPS pressure setpoint. Having the setpoints of both valves within the limits in Figure 3.4.12-1 ensures that the Reference 1 limits will not be exceeded in any analyzed event.

In addition to generating the OPS pressure setpoint, the same cold leg temperature signals are used to "arm" the OPS when RCS temperature falls below the temperature at which low temperature overpressure protection is required (319°F). Each PORV opens when a two-out-of-two (temperature and pressure) coincidence logic is satisfied. OPS is "armed" when RCS temperature falls below the temperature that satisfies one half of the two-out-of-two (temperature-pressure) coincidence logic. When OPS is enabled, the PORVs will open if RCS pressure exceeds the calculated pressure setpoint that varies with RCS temperature.

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BASES

BACKGROUND (continued)

The PORV block valves open when the RCS temperature falls below the OPS arming temperature. Note that the control switches for the PORV and PORV block valves must be in the AUTO position and the OPS states links closed for OPS signals to actuate the PORVs.

Three channels of RCS cold leg temperature are used in the two-out-of-three coincidence logic to satisfy the temperature portion of the two-out-of-two (temperature and pressure) coincidence logic for each PORV. Three channels of RCS pressure are used in a two-out-of-three coincidence logic to satisfy the pressure portion of the two-out-of-two (temperature-pressure) coincidence logic for each PORV. Use of a two-out-of-three coincidence logic for pressure and for temperature ensures that a single failure will not cause or prevent an OPS actuation. Use of two PORVs, each with adequate relieving capability to prevent overpressurization, ensures that a single failure will not prevent an OPS actuation.

When a PORV is opened in an increasing pressure transient, the release of coolant will cause the pressure increase to slow and reverse. As the PORV releases coolant, the RCS pressure decreases until a reset pressure is reached and the valve is signaled to close. The pressure continues to decrease below the reset pressure as the valve closes.

RCS Vent Requirements

Once the RCS is depressurized, a vent exposed to the containment atmosphere will maintain the RCS at containment ambient pressure in an RCS overpressure transient, if the relieving requirements of the transient do not exceed the capabilities of the vent. Thus, the vent path must be capable of relieving the flow resulting from the limiting LTOP mass or heat input transient, and maintaining pressure below the P/T limits. The required vent capacity may be provided by one or more vent paths.

Multiple methods exist for establishing the required RCS vent capacity including removing or blocking open a PORV and disabling its block valve in the open position. An RCS vent of ≥ 2.00 square inches when no HHSI pump is capable of injecting into the

(continued)

BASES

BACKGROUND (continued)

RCS; or, an RCS vent with opening greater than or equal to one pressurizer code safety valve flange and up to two HHSI pumps capable of injecting into the RCS will satisfy LTOP requirements because either configuration ensures pressure limits are not exceed during a transient. Alternately, an RCS vent of ≥ 2.00 square inches coupled with a pressurizer level ≤ 0% and up to two HHSI pumps capable of injecting into the RCS will satisfy LTOP requirements because it ensures a minimum of 10 minutes for operator action before pressure limits are exceeded during a transient. The vent path(s) must be above the level of reactor coolant, so as not to drain the RCS when open.

APPLICABLE SAFETY ANALYSES

Safety analyses (Ref. 3) demonstrate that the reactor vessel is adequately protected against exceeding the Reference 1 P/T limits. In MODES 1, 2, and 3, with RCS cold leg temperature exceeding 411°F, the pressurizer safety valves will prevent RCS pressure from exceeding the Reference 1 limits. At 319°F and below, overpressure prevention falls to two OPERABLE PORVs in conjunction with the Overpressure Protection System (OPS) or to a depressurized RCS and a sufficient sized RCS vent. Each of these means has a limited overpressure relief capability. Alternately, if redundant PORVs are not Operable, Low Temperature Overpressure protection may be maintained by limiting the pressurizer level to within limits specified in Figure 3.4.12-2 and Figure 3.4.12-3 consistent with the number of charging pumps and number of high head safety injection (HHSI) pumps capable of injecting into the RCS. This approach is acceptable because pressurizer level can be established to either accommodate any anticipated pressure surge or allow operators time to react to any unanticipated pressure surge.

When the RCS temperature is greater than the LTOP arming temperature (i.e., ≥ 319°F) but below the minimum temperature at which the pressurizer safety valves lift prior to violation of the 10 CFR 50, Appendix G, limits (i.e., ≤ 411°F), administrative controls in the Technical Requirements Manual (TRM) (Ref. 4) are used to limit the potential for exceeding 10 CFR 50, Appendix G,

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APPLICABLE SAFETY ANALYSES (continued)

limits. These administrative controls may include operating with a bubble in the pressurizer and/or otherwise limiting plant time or activities when the RCS temperature is in the specified range. The use of administrative controls to govern operation above the LTOP arming temperature but below the minimum temperature at which the pressurizer safety valves lift prior to violation of the 10 CFR 50, Appendix G, limits is consistent with the guidance provided in Generic Letter 88-011, NRC Position on Radiation Embrittlement of Reactor Vessel Materials and its Impact on Plant Operations (Ref.2). GL 88-011 states that automatic, or passive, protection of the P-T limits will not be required but administratively controlled when in the upper end of the 10 CFR 50, Appendix G, temperature range.

The actual temperature at which the pressure in the P/T limit curve falls below the pressurizer safety valve setpoint increases as the reactor vessel material toughness decreases due to neutron embrittlement. Each time the Figure 3.4.12-1 curves are revised, LTOP must be re-evaluated to ensure its functional requirements can still be met using the OPS (PORVs) method or the depressurized and vented RCS condition.

Figure 3.4.12-1 contains the acceptance limits that define the LTOP requirements. Any change to the RCS must be evaluated against the Ref. 3 analyses to determine the impact of the change on the LTOP acceptance limits.

Transients that are capable of overpressurizing the RCS are categorized as either mass or heat input transients, examples of which follow:

Mass Input Type Transients

a. Inadvertent safety injection; or

b. Charging/letdown flow mismatch.

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BASES

APPLICABLE SAFETY ANALYSES (continued)

Heat Input Type Transients

a. Inadvertent actuation of pressurizer heaters;

b. Loss of RHR cooling; or

c. Reactor coolant pump (RCP) startup with temperature asymmetry within the RCS or between the RCS and steam generators.

The following are required during the LTOP MODES to ensure that mass and heat input transients do not occur. This is accomplished by the following:

a. Rendering all HHSI pumps incapable of injection;

b. Deactivating the accumulator discharge isolation valves in their closed positions or maintaining accumulator pressure less than the maximum RCS pressure for the coldest existing RCS cold leg temperature allowed by the P/T limit curves provided in Figure 3.4.12-1; and

c. Disallowing start of an RCP unless conditions are established that ensure a RCP pump start will not cause a pressure excursion that will exceed LTOP limits. Required conditions for starting a RCP when LTOP is required include a combination of primary and secondary water temperature differences and Overpressure Protection System (OPS) status or pressurizer level. Meeting the LTOP RCP starting surveillances ensures that theses conditions are satisfied prior to a RCP pump start.

The Ref. 3 analyses demonstrate that either one PORV or the depressurized RCS and RCS vent can maintain RCS pressure below limits when no HHSI pump is capable of injecting into the RCS. This assumes an RCS vent of ≥ 2.00 square inches. The same protection can be provided when up to two HHSI pumps are capable of injecting into the RCS assuming an RCS vent with opening

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

greater than or equal to one code pressurizer safety valve flange. Alternately, LTOP requirements can be satisfied by various combinations of pressurizer level, RCS pressure, and RCS injection capability (i.e., maximum number of HHSI pumps and/or charging pumps) shown in Figure 3.4.12-2 and 3.4.12-3. These combinations of pressurizer level, RCS pressure, and RCS injection capability satisfy LTOP requirements by ensuring a minimum of 10 minutes for operator action to terminate an unplanned event prior to exceeding maximum allowable RCS pressure. None of the analyses addressed the pressure transient need from accumulator injection, therefore, when RCS temperature is low, the LCO also requires the accumulator isolation when accumulator pressure is greater than or equal to the maximum RCS pressure for the coldest existing RCS cold leg temperature allowed in Figure 3.4.12-1.

If the accumulators are isolated and not depressurized, then the accumulators must have their discharge valves closed and the valve power supply breakers fixed in their open positions.

Fracture mechanics analyses established the temperature of LTOP Applicability at 319°F.

The consequences of a loss of coolant accident (LOCA) in LTOP MODE 4 conform to 10 CFR 50.46 and 10 CFR 50, Appendix K (Refs. 5 and 6) requirements by having ECCS OPERABLE in accordance with requirements in LCO 3.5.3, ECCS-Shutdown.

PORV Performance

The fracture mechanics analyses show that the vessel is protected when the PORVs are set to open at or below the limit shown in Figure 3.4.12-1. The setpoints are derived by analyses that model the performance of the LTOP System, assuming the limiting LTOP transient with HHSI not injecting into the RCS. These analyses consider pressure overshoot and undershoot beyond the PORV opening and closing, resulting from signal processing and valve stroke times. The PORV setpoints at or below the derived

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BASES

APPLICABLE SAFETY ANALYSES (continued)

limit ensures the Reference 1 P/T limits will be met. The OPS setpoint is based on a comparative analysis of Reference 3, with allowances for metal/fluid temperature differences, static head due to elevation differences, and dynamic head from the operation of the reactor coolant pumps and RHR pumps.

The PORV setpoints in Figure 3.4.12-1 will be updated when the revised P/T limits conflict with the LTOP analysis limits. The P/T limits are periodically modified as the reactor vessel material toughness decreases due to neutron embrittlement caused by neutron irradiation. Revised limits are determined using neutron fluence projections and the results of examinations of the reactor vessel material irradiation surveillance specimens. The Bases for LCO 3.4.3, "RCS Pressure and Temperature (P/T) Limits," discuss these examinations.

The PORVs are considered active components. Thus, the failure of one PORV is assumed to represent the worst case, single active failure.

RCS Vent Performance

With the RCS depressurized, analyses show a vent size of 1.4 square inches is capable of mitigating the allowed LTOP overpressure transient assuming no HHSI pump and no accumulator injects into the RCS. The LCO limit for an RCS vent is conservatively established at 2.00 square inches. The capacity of a vent this size is greater than the flow of the limiting transient for the LTOP configuration, maintaining RCS pressure less than the maximum pressure on the P/T limit curve. An RCS vent with opening greater than or equal to one pressurizer code safety valve flange and up to two HHSI pumps capable of injecting into the RCS will satisfy LTOP requirements because it ensures pressure limits are not exceed during a transient. An RCS vent of ≥ 2.00 square inches coupled with a pressurizer level ≤ 0% and up to two HHSI pumps capable of injecting into the RCS will

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BASES

APPLICABLE SAFETY ANALYSES (continued)

satisfy LTOP requirements because it ensures a minimum of 10 minutes for operator action before pressure limits are exceeded during a transient.

The RCS vent size will be re-evaluated for compliance each time the P/T limit curves are revised based on the results of the vessel material surveillance.

The RCS vent is passive and is not subject to active failure.

LTOP satisfies Criterion 2 of 10 CFR 50.36.

LCO

This LCO requires that LTOP is OPERABLE. LTOP is OPERABLE when the minimum coolant input and pressure relief capabilities are OPERABLE. Violation of this LCO could lead to the loss of low temperature overpressure mitigation and violation of the Reference 1 limits as a result of an operational transient.

To limit the coolant input capability, the LCO requires that no HHSI pumps be capable of injecting into the RCS and all accumulator discharge isolation valves closed and de-energized if accumulator pressure is greater than or equal to the maximum RCS pressure for the existing RCS cold leg temperature allowed in Figure 3.4.12-1, Maximum Allowable Nominal PORV Setpoint for LTOP (OPS).

The elements of the LCO that provide low temperature overpressure mitigation through pressure relief are:

a. Two OPERABLE PORVs configured as part of an OPERABLE Overpressure Protection System (OPS); or

b. A depressurized RCS and an RCS vent.

A PORV is OPERABLE for LTOP when its block valve is open, its lift setpoint is set to the limit required by Figure 3.4.12-1 and testing proves its ability to open at this setpoint, and motive

(continued)

BASES

LCO (continued)

power is available to the two valves and their control circuits. The OPS is OPERABLE for LTOP when there are three OPERABLE RCS pressure channels and three OPERABLE RCS temperature channels. The OPS is still OPERABLE when an inoperable RCS pressure or temperature channel is in the tripped condition. OPS is considered OPERABLE for meeting LCO 3.4.12 requirements even if one or two RCS cold leg temperatures is above the LTOP Applicability limit.

An RCS vent is OPERABLE when open with an area of ≥ 2.00 square inches.

Each of these methods of overpressure prevention is capable of mitigating the limiting LTOP transient.

APPLICABILITY

This LCO is applicable whenever the RHR System is not isolated from the RCS to protect the RHR system piping. When all RCS cold leg temperatures are ≥ 319°F, RHR system piping is adequately protected by making the accumulators and all HHSI pumps incapable of injecting into the RCS. Therefore, a Note in the LCO specifies that requirements for the OPS System and/or an RCS vent are not Applicable when all RCS cold leg temperatures are ≥ 319°F.

This LCO is applicable to provide protection for the RCS pressure boundary in MODE 4 when any RCS cold leg temperature is < 319°F, in MODE 5, and in MODE 6 when the reactor vessel head is on. The pressurizer safety valves provide overpressure protection that meets the Reference 1 P/T limits above 319°F. When the reactor vessel head is off, overpressurization cannot occur. Although LTOP is not Applicable when the RCS temperature is greater than the LTOP arming temperature (i.e., ≥ 319°F) but below the minimum temperature at which the pressurizer safety valves lift prior to violation of the 10 CFR 50, Appendix G, limits (i.e., ≤ 411°F), administrative controls in the Technical Requirements Manual (TRM) (Ref. 4) are used to limit the potential for exceeding 10 CFR 50, Appendix G, limits.

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BASES

APPLICABILITY (continued)

LCO 3.4.3 provides the operational P/T limits for all MODES. LCO 3.4.10, "Pressurizer Safety Valves," requires the OPERABILITY of the pressurizer safety valves that provide overpressure protection during MODES 1, 2, and 3, and MODE 4 above 319°F when the RHR system is isolated from the RCS.

Low temperature overpressure prevention is most critical during shutdown when the RCS is water solid, and a mass or heat input transient can cause a very rapid increase in RCS pressure when little or no time allows operator action to mitigate the event.

The Applicability is modified by three Notes, Note 1 states that accumulator isolation is only required when the accumulator pressure is more than the maximum RCS pressure for the existing temperature, as allowed by the P/T limit curves. This Note permits the accumulator discharge isolation valve Surveillance to be performed only under these pressure and temperature conditions.

Note 2 ensures that LCO 3.4.12 will not prohibit a HHSI pump being energized and aligned to the RCS as needed to support emergency boration or to respond to a loss of RHR cooling.

Note 3 specifies that one HHSI pump may be made capable of injecting into the RCS for a period not to exceed 8 hours to perform pump testing. During testing, administrative controls are used to ensure that HHSI testing will not result in exceeding RCS or RHR system pressure limits.

ACTIONS

A.1, A.2.1, A.2.2, A.2.3, A.3.1 and A.3.2

When one or more HHSI pumps are capable of injecting into the RCS, LTOP assumptions regarding limits on mass input capability may not be met. Therefore, immediate action is required to limit injection capability consistent with the LTOP analysis assumptions and the existing combination of pressurizer level and RCS venting capacity. Required Action A.1 requires restoration

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BASES

ACTIONS

A.1, A.2.1, A.2.2, A.2.3, A.3.1 and A.3.2 (continued)

with LCO requirements. Required Actions A.2 and A.3 require verification and periodic re-verification that alternate LTOP configurations are met. The Completion Times of immediately reflects the urgency that one of the acceptable LTOP configurations is established as soon as possible.

B.1, C.1 and C.2

To be considered isolated, an accumulator must have its discharge valves closed and the valve power supply breakers fixed in the open position.

An unisolated accumulator requires isolation within 1 hour. This is only required when the accumulator pressure is at or more than the maximum RCS pressure for the existing temperature allowed by the P/T limit curves.

If isolation is needed and cannot be accomplished in 1 hour, Required Action C.1 and Required Action C.2 provide two options, either of which must be performed in the next 12 hours. By increasing the RCS temperature to ≥ 319°F, an accumulator pressure of 700 psig cannot exceed the LTOP limits if the accumulators are injected. Isolating the RHR system from the RCS ensures that the RHR system is not subjected to accumulator pressure. Depressurizing the accumulators below the LTOP limit from Figure 3.4.12-1 also gives this protection. Additionally, the RHR System must be isolated from the RCS to protect RHR piping from a potential mass addition event.

The Completion Times are based on operating experience that these activities can be accomplished in these time periods and on engineering evaluations indicating that an event requiring LTOP is not likely in the allowed times.

(continued)

BASES

ACTIONS (continued)

D.1

When any RCS cold leg temperature is < 319°F, with one required PORV inoperable, the PORV must be restored to OPERABLE status within a Completion Time of 7 days. Two PORVs are required to provide low temperature overpressure mitigation while withstanding a single failure of an active component.

The Completion Time considers the facts that only one of the PORVs is required to mitigate an overpressure transient and that the likelihood of an active failure of the remaining valve path during this time period is very low.

E.1

When both required PORVs are inoperable or the Required Action and associated Completion Time of Condition C or D is not met, an alternate method of low temperature overpressure protection must be established within 8 hours. The acceptable alternate methods of LTOP include the following:

a. Depressurize the RCS and establish an RCS vent path; or

b. Increase all RCS cold leg temperatures to ≥ 319°F and isolate the RHR system from the RCS; or

If the option selected is to depressurize the RCS and establish an RCS vent path, the vent must be sized ≥ 2.00 square inches to ensure that the flow capacity is greater than that required for the worst case mass input transient reasonable during the applicable MODES. This action is needed to protect the RCPB from a low temperature overpressure event and a possible brittle failure of the reactor vessel.

The Completion Time considers the time required to place the plant in this Condition and the relatively low probability of an overpressure event during this time period due to increased operator awareness of administrative control requirements.

(continued)

BASES

ACTIONS (continued)

E.1

If LTOP requirements are not met for reasons other than Conditions A, B, C, D or E, LTOP requirements must be re-established by depressurizing the RCS and establishing an RCS vent of ≥ 2.00 square inches within 8 hours.

SURVEILLANCE REQUIREMENTS

SR 3.4.12.1 and SR 3.4.12.2

To minimize the potential for a low temperature overpressure event by limiting the mass input capability, all HHSI pumps are verified incapable of injecting into the RCS. Additionally, the accumulator discharge isolation valves are verified closed and locked out or the accumulator pressure less than the maximum RCS pressure for the existing RCS cold leg temperature allowed by the P/T limit curves provided in Figure 3.4.12-1.

The HHSI pumps are rendered incapable of injecting into the RCS through removing the power from the pumps by racking the breakers out under administrative control. Other methods may be employed using at least two independent means to prevent a pump start such that a single failure or single action will not result in an injection into the RCS. This may be accomplished through the pump control switch being placed in Trip Pullout and at least one valve in the discharge flow path being closed.

The Frequency of 12 hours is sufficient, considering other indications and alarms available to the operator in the control room, to verify the required status of the equipment.

SR 3.4.12.3

The RCS vent of ≥ 2.00 square inches is proven OPERABLE by verifying its open condition either:

a. Once every 12 hours for a valve that is not locked.

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BASES

SURVEILLANCE REQUIREMENTS

SR 3.4.12.3 (continued)

b. Once every 31 days for a valve that is locked, sealed, or secured in position. A removed pressurizer safety valve, PORV, or Manway Cover fits this category.

The passive vent arrangement must only be open to be OPERABLE. This Surveillance is required to be performed if the vent is being used to satisfy the pressure relief requirements of the LCO 3.4.12.b.

SR 3.4.12.4

Performance of the CHANNEL CHECK of the Overpressure Protection System (OPS) RCS pressure and temperature channels every 24 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.

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

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.4.12.4 (continued)

operational use of the displays associated with the LCO required channels. This SR is required only when LCO 3.4.12.a is used to establish LTOP protection.

SR 3.4.12.5

The PORV block valve opens automatically when RCS cold leg temperature is below the OPS arming temperature; however, the valves must be verified open every 72 hours to provide the flow path for each required PORV to perform its function when actuated. The valve may be remotely verified open in the control room. This Surveillance is performed only if the PORV is being used to satisfy LCO 3.4.12.a.

The block valve is a remotely controlled, motor operated valve. The power to the valve operator is not required removed, and the manual operator is not required locked in the inactive position. Thus, the block valve can be closed in the event the PORV develops excessive leakage or does not close (sticks open) after relieving an overpressure situation. If closed, the block valve must be de-energized to prevent the valve from re-opening automatically.

The 72 hour Frequency is considered adequate because the PORV block valves are opened automatically by the OPS when below the OPS arming temperature if the valve control is positioned to auto and other administrative controls available to the operator in the control room, such as valve position indication, that verify that the PORV block valve remains open.

SR 3.4.12.6

Performance of a COT is required within 12 hours after decreasing all RCS temperatures to < 319°F and every 31 days on each required PORV to verify and, as necessary, adjust its lift

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.4.12.6 (continued)

setpoint. The COT will verify the setpoint is within the allowed maximum limits in Figure 3.4.12-1. PORV actuation could depressurize the RCS and is not required.

The 24 month Frequency considers the demonstrated reliability of the Overpressure Protection System and the PORVs.

A Note has been added indicating that this SR is required to be met 12 hours after decreasing RCS cold leg temperature to < 319 °F. The COT cannot be performed until in the LTOP MODES when the PORV lift setpoint can be reduced to the LTOP setting. The test must be performed within 12 hours after entering the LTOP MODES.

SR 3.4.12.7

Performance of a CHANNEL CALIBRATION on each required PORV actuation channel is required every 18 months. Performance of a CHANNEL CALIBRATION of RCS pressure and temperature instruments that support the Overpressure Protection System is required every 24 months. These calibrations verify both the OPS and PORV function and ensure the OPERABILITY of the whole channel so that it responds and the valve opens within the required range and accuracy to known input.

SR 3.4.12.8 and SR 3.4.12.9

The RCP starting prerequisites must be satisfied prior to starting or jogging any reactor coolant pump (RCP) when low temperature overpressure protection is required. The RCP starting prerequisites prevent an overpressure event due to thermal transients when an RCP is started. Plant conditions prior to the RCP start determines whether SR 3.4.12.8 or SR 3.4.12.9 must be satisfied prior to starting any RCP.

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BASES

SURVEILLANCE REQUIREMENTS

SR 3.4.12.8 and SR 3.4.12.9 (continued)

The principal contributor to an RCP start induced thermal and pressure transient is the difference between RCS cold leg temperatures and secondary side water temperature of any SG prior to the start of an RCP. The RCP starting prerequisites vary depending on plant conditions but include the following: reactor coolant temperature relative to the LTOP enable temperature; secondary side water temperature of the hottest SG relative to the temperature of the coldest RCS cold leg temperature; and, status of the Overpressure Protection System (OPS). When the OPS is inoperable, additional compensatory requirements are required including limits for the pressurizer level and RCS pressure and temperature. When a pressurizer level is specified as a requirement, the level specified is sufficient to prevent the RCS from going water solid for 10 minutes which is sufficient time for operator action to terminate the pressure transient.

SR 3.4.12.8 is used if secondary side water temperature of the hottest steam generator (SG) is less than or equal to the coldest RCS cold leg temperature. SR 3.4.12.9 is more restrictive and is used if the secondary side water temperature of the hottest steam generator is ≤ 64°F above the coldest RCS cold leg temperature.

RCP starting is prohibited if the hottest steam generator is > 64°F above RCS cold leg temperature or if neither of the RCP starting prerequisites SRs can be satisfied. The steam generator temperature may be measured using the Control Room instrumentation or, as a backup, from a contact reading off the steam generator's shells. Pressurizer level may be determined using control room instrumentation or alternate methods.

The FREQUENCY of the RCP starting prerequisites SRs is Within 15 minutes prior to starting any RCP. This means that each of the required verifications must be performed within 15 minutes prior to the pump start and must be met at the time of the pump start.

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BASES

SURVEILLANCE REQUIREMENTS

SR 3.4.12.8 and SR 3.4.12.9 (continued)

SR 3.4.12.8 and SR 3.4.12.9 are each modified by two Notes. Note 1 specifies that these SRs are required as a condition for pump starting only when the RCS is below the LTOP arming temperature. Note 2 specifies that meeting either SR 3.4.12.8 or SR 3.4.12.9 ensures that pump starting prerequisites are met.

REFERENCES

1. 10 CFR 50, Appendix G.

2. Generic Letter 88-011, NRC Position on Radiation Embrittlement of Reactor Vessel Materials and its Impact on Plant Operations.

3. IP3 Low Temperature Overpressurization System Analysis Final Report, August 24, 1984, in conjunction with ASME Code Case N-514, Low Temperature Overpressure Protection, February 12, 1992.

4. IP3 Technical Requirements Manual.

5. 10 CFR 50, Section 50.46.

6. 10 CFR 50, Appendix K.

B 3.4 REACTOR COOLANT SYSTEM (RCS)

B 3.4.13 RCS Operational LEAKAGE

BASES

BACKGROUND

Components that contain or transport the coolant to or from the reactor core make up the RCS. Component joints are made by welding, bolting, rolling, or pressure loading, and valves isolate connecting systems from the RCS.

During plant life, the joint and valve interfaces can produce varying amounts of reactor coolant LEAKAGE, through either normal operational wear or mechanical deterioration. The purpose of the RCS Operational LEAKAGE LCO is to limit system operation in the presence of LEAKAGE from these sources to amounts that do not compromise safety. This LCO specifies the types and amounts of LEAKAGE. 10 CFR 50, Appendix A, GDC 30 (Ref. 1), requires means for detecting and, to the extent practical, identifying the source of reactor coolant LEAKAGE.

The safety significance of RCS LEAKAGE varies widely depending on its source, rate, and duration. Therefore, detecting and monitoring reactor coolant LEAKAGE into the containment area is necessary. Quickly separating the identified LEAKAGE from the unidentified LEAKAGE is necessary to provide quantitative information to the operators, allowing them to take corrective action should a leak occur that is detrimental to the safety of the facility and the public.

A limited amount of leakage inside containment is expected from auxiliary systems that cannot be made 100% leaktight. Leakage from these systems should be detected, located, and isolated from the containment atmosphere, if possible, to not interfere with RCS leakage detection.

This LCO deals with protection of the reactor coolant pressure boundary (RCPB) from degradation and the core from inadequate cooling, in addition to preventing the accident analyses radiation release assumptions from being exceeded. The consequences of violating this LCO include the possibility of a loss of coolant accident (LOCA).

(continued)

BASES (continued)

APPLICABLE SAFETY ANALYSES

Except for primary to secondary LEAKAGE, the safety analyses do not address operational LEAKAGE. However, other operational LEAKAGE is related to the safety analyses for LOCA; the amount of leakage can affect the probability of such an event. The safety analysis for events resulting in steam discharge to the atmosphere assumes a range of primary to secondary LEAKAGE from 0.1 gpm to 10 gpm as the initial condition.

Primary to secondary LEAKAGE is a factor in the dose releases outside containment resulting from a steam line break (SLB) accident. To a lesser extent, other accidents or transients involve secondary steam release to the atmosphere, such as a steam generator tube rupture (SGTR). The leakage contaminates the secondary fluid.

The FSAR (Ref. 2) analysis for SGTR assumes the contaminated secondary fluid is released via safety valves and atmospheric dump valves. The 1 gpm primary to secondary LEAKAGE is relatively inconsequential.

The SLB is more limiting for site radiation releases. The safety analysis for the SLB accident assumes a range of primary to secondary LEAKAGE as an initial condition. The dose consequences resulting from the SLB accident are well within the limits defined in 10 CFR 100 and the staff approved licensing basis (i.e., a small fraction of these limits).

The RCS operational LEAKAGE satisfies Criterion 2 of 10 CFR 50.36.

LCO

RCS operational LEAKAGE shall be limited to:

a. Pressure Boundary LEAKAGE

No pressure boundary LEAKAGE is allowed, being indicative of material deterioration. LEAKAGE of this type is unacceptable as the leak itself could cause further deterioration,

(continued)

BASES

LCO (continued)

resulting in higher LEAKAGE. Violation ofthis LCO could result in continued degradation of the RCPB LEAKAGE past seals and gaskets is not pressure boundary LEAKAGE.

b. Unidentified LEAKAGE

One gallon per minute (gpm) of unidentified LEAKAGE is allowed as a reasonable minimum detectable amount and is consistent with the capability of the equipment required by LCO 3.4.15, RCS Leakage Detection Instrumentation. Violation of this LCO could result in continued degradation of the RCPB, if the LEAKAGE is from the pressure boundary.

c. Identified LEAKAGE

Up to 10 gpm of identified LEAKAGE is considered allowable because LEAKAGE is from known sources that do not interfere with detection of unidentified LEAKAGE and is well within the capability of the RCS Makeup System. Identified LEAKAGE includes LEAKAGE to the containment from specifically known and located sources, but does not include pressure boundary LEAKAGE, the leakage into closed systems or controlled reactor coolant pump (RCP) seal leakoff (a normal function not considered LEAKAGE). Violation of this LCO could result in continued degradation of a component or system.

d. Primary to Secondary LEAKAGE through All Steam Generators (SGs)

Total primary to secondary LEAKAGE amounting to 1 gpm (1440 gpd) through all SGs produces acceptable offsite doses in the SLB accident analysis. Violation of this LCO could exceed the offsite dose limits for this accident. Primary to secondary LEAKAGE must be included in the total allowable limit for identified LEAKAGE.

(continued)

BASES

LCO (continued)

e. Primary to Secondary LEAKAGE through Any One SG

The 432 gallons per day (0.3 gpm) limit on one SG is based on the assumption that a single crack leaking this amount would not propagate to a SGTR under the stress conditions of a LOCA or a main steam line rupture. If leaked through many cracks, the cracks are very small, and the above assumption is conservative.

APPLICABILITY

In MODES 1, 2, 3, and 4, the potential for RCPB LEAKAGE is greatest when the RCS is pressurized.

In MODES 5 and 6, LEAKAGE limits are not required because the reactor coolant pressure is far lower, resulting in lower stresses and reduced potentials for LEAKAGE.

Leakage past PIVs or other leakage into closed systems is that leakage that can be accounted for and contained by a system not directly connected to the atmosphere. Leakage past PIVs or other leakage into closed systems is not included in the limits for either identified or unidentified LEAKAGE but PIV leakage must be within the limits specified for PIVs in LCO 3.4.14, "RCS Pressure Isolation Valves (PIV)." Leakage past PIVs or other leakage into closed systems is quantified before being exempted from the limits for identified LEAKAGE.

ACTIONS

A.1

Unidentified LEAKAGE, identified LEAKAGE, or primary to secondary LEAKAGE in excess of the LCO limits must be reduced to within limits within 4 hours. This Completion Time allows time to verify leakage rates and either identify unidentified LEAKAGE or reduce LEAKAGE to within limits before the reactor must be shut down. This action is necessary to prevent further deterioration of the RCPB.

B.1 and B.2

If any pressure boundary LEAKAGE exists, or if unidentified LEAKAGE, identified LEAKAGE, or primary to secondary LEAKAGE

(continued)

BASES

ACTIONS

B.1 and B.2 (continued)

cannot be reduced to within limits within 4 hours, the reactor must be brought to lower pressure conditions to reduce the severity of the LEAKAGE and its potential consequences. It should be noted that LEAKAGE past seals and gaskets is not pressure boundary LEAKAGE. The reactor must be brought to MODE 3 within 6 hours and MODE 5 within 36 hours. This action reduces the LEAKAGE and also reduces the factors that tend to degrade the pressure boundary.

The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems. In MODE 5, the pressure stresses acting on the RCPB are much lower, and further deterioration is much less likely.

SURVEILLANCE REQUIREMENTS

SR 3.4.13.1

Verifying RCS LEAKAGE to be within the LCO limits ensures the integrity of the RCPB is maintained. Pressure boundary LEAKAGE would at first appear as unidentified LEAKAGE and can only be positively identified by inspection. It should be noted that LEAKAGE past seals and gaskets is not pressure boundary LEAKAGE. Unidentified LEAKAGE and identified LEAKAGE are determined by performance of an RCS water inventory balance. Primary to secondary LEAKAGE is also measured by performance of an RCS water inventory balance in conjunction with effluent monitoring within the secondary steam and blowdown systems.

The RCS water inventory balance must be met with the reactor at steady state operating conditions and near operating pressure. Therefore, this SR is not required to be performed in MODES 3 and 4 until 12 hours of steady state operation near operating pressure have been established.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.4.13.1 (continued)

Steady state operation is required to perform a proper inventory balance; calculations during maneuvering are not useful and a Note requires the Surveillance to be met when steady state is established. For RCS operational LEAKAGE determination by water inventory balance, steady state is defined as stable RCS pressure, temperature, power level, pressurizer and makeup tank levels, makeup and letdown, and RCP seal injection and return flows.

An early warning of pressure boundary LEAKAGE or unidentified LEAKAGE is provided by the automatic systems that monitor the containment atmosphere radioactivity and the containment sump level. These leakage detection systems are specified in LCO 3.4.15, "RCS Leakage Detection Instrumentation." It should be noted that LEAKAGE past seals and gaskets, measured leakage past PIVs, and other leakage into closed systems is not pressure boundary LEAKAGE.

The 72 hour Frequency is a reasonable interval to trend LEAKAGE and recognizes the importance of early leakage detection in the prevention of accidents. A Note under the Frequency column states that this SR is required to be performed during steady state operation.

SR 3.4.13.2

This SR provides the means necessary to determine SG OPERABILITY in an operational MODE. The requirement to demonstrate SG tube integrity in accordance with the Steam Generator Tube Surveillance Program emphasizes the importance of SG tube integrity, even though this Surveillance cannot be performed at normal operating conditions.

REFERENCES

1. 10 CFR 50, Appendix A, GDC 30.

2. FSAR, Section 14.

B 3.4 REACTOR COOLANT SYSTEM (RCS)

B 3.4.14 RCS Pressure Isolation Valve (PIV) Leakage

BASES

BACKGROUND

10 CFR 50.2, 10 CFR 50.55a(c), and GDC 55 of 10 CFR 50, Appendix A (Refs. 1, 2, and 3), define RCS PIVs as any two normally closed valves in series within the reactor coolant pressure boundary (RCPB), which separate the high pressure RCS from an attached low pressure system. During their lives, these valves can produce varying amounts of reactor coolant leakage through either normal operational wear or mechanical deterioration. The RCS PIV Leakage LCO allows RCS high pressure operation when leakage through these valves exists in amounts that do not compromise safety. The RCS PIVs for which the leakage limits of this LCO apply are listed in FSAR Table 6.7-3.

The PIV leakage limit applies to each individual valve. Leakage through PIVs into closed systems is not included in the limits for either identified or unidentified LEAKAGE in LCO 3.4.13, RCS Operational LEAKAGE. Leakage past PIVs into closed systems is that leakage which can be accounted for and contained by a system not directly connected to the atmosphere.

Although this specification provides a limit on allowable PIV leakage rate, its main purpose is to prevent overpressure failure of the low pressure portions of connecting systems. The leakage limit is an indication that the PIVs between the RCS and the connecting systems are degraded or degrading. PIV leakage could lead to overpressure of the low pressure piping or components. Failure consequences could be a loss of coolant accident (LOCA) outside of containment, an unanalyzed accident, that could degrade the ability for low pressure injection.

(continued)

BASES

BACKGROUND (continued)

The basis for this LCO is the 1975 NRC "Reactor Safety Study" (Ref. 4) that identified potential intersystem LOCAs as a significant contributor to the risk of core melt. A subsequent study (Ref. 5) evaluated various PIV configurations to determine the probability of intersystem LOCAs.

PIVs are typically provided to isolate the RCS from the following connected systems:

a. Residual Heat Removal (RHR) System; and

b. Safety Injection System.

Violation of this LCO could result in continued degradation of a PIV, which could lead to overpressurization of a low pressure system and the loss of the integrity of a fission product barrier.

Residual Heat Removal System Valves 730 and 731 are the PIVs that isolate the RHR System from the RCS. A failure of valves 730 and 731 when the RCS is at normal operating temperature and pressure will result in an intersystem LOCA in which the containment's protective barrier is bypassed (i.e., a LOCA outside containment) because RCS pressure is significantly greater than RHR System design pressure and the RHR system is outside containment. Therefore, administrative controls ensure that both RHR 730 and 731 are closed and de-activated in MODES 1, 2 and 3 and in MODE 4 when the RHR System is not in operation.

Even though administrative controls provide a high degree of assurance that both RHR suction isolation valves are closed during normal plant operation, there is a significant concern that plant operation could proceed for an extended period of time with one of the RHR suction valves not closed. This situation could result from the failure of an operator to close both valves or inadvertent opening of one of the valves during operation. With this plant status, a single failure of the remaining RHR suction isolation valve will result in a LOCA outside containment (Ref. 10). Due to the potential significance of a LOCA outside containment, each of the RHR suction isolation valves is equipped with an autoclosure interlock (ACI) and an open permissive

(continued)

BASES

BACKGROUND (continued)

interlock (OPI). The purpose of the OPIs and ACIs is to provide a diverse backup to administrative requirements that ensure that both 730 and 731 are closed to provide a double barrier between the RCS and the RHR System when not in the RHR cooling mode and RCS pressure is above the RHR System design pressure (Ref. 10).

APPLICABLE SAFETY ANALYSES

Reference 4 identified potential intersystem LOCAs as a significant contributor to the risk of core melt. The dominant accident sequence in the intersystem LOCA category is the failure of the low pressure portion of the RHR System outside of containment.

The accident is the result of a postulated failure of the PIVs, which are part of the RCPB, and the subsequent pressurization of the RHR System downstream of the PIVs from the RCS. Because the low pressure portion of the RHR System is designed for 600 psig, overpressurization failure of the RHR low pressure line would result in a LOCA outside containment and subsequent risk of core melt.

Reference 5 evaluated various PIV configurations, leakage testing of the valves, and operational changes to determine the effect on the probability of intersystem LOCAs. This study concluded that periodic leakage testing of the PIVs can substantially reduce the probability of an intersystem LOCA.

The RHR isolation valve ACI and OPI provide a diverse backup to administrative requirements to ensure that both RHR suction isolation valves are closed to provide a double barrier between the RCS and the RHR System when not in the RHR cooling mode and RCS pressure is above the RHR System design pressure (Ref. 10). Although the OPI and ACI are not required to provide overpressure protection when RHR is in operation, the nominal setpoints are below the RHR System design pressure (i.e., 600 psig). Additionally, the applicable RHR system piping Code, USAS B3.1, allows an overpressure allowance above the design pressure under transient conditions (Ref. 6). Therefore, even when pump

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BASES

APPLICABLE SAFETY ANALYSES (continued)

discharge head and maximum instrument uncertainties are considered, the ACI will actuate before the RHR System pressure transient limit is exceeded.

RCS PIV leakage satisfies Criterion 2 of 10 CFR 50.36.

LCO

RCS PIV leakage is leakage into closed systems connected to the RCS. Leakage through PIVs into closed systems is not included in the limits for either identified or unidentified LEAKAGE in LCO 3.4.13, RCS Operational LEAKAGE. Leakage past PIVs into closed systems is that leakage which can be accounted for and contained by a system not directly connected to the atmosphere. Isolation valve leakage is usually on the order of drops per minute. Leakage that increases significantly suggests that something is operationally wrong and corrective action must be taken.

The LCO PIV leakage limit is 0.5 gpm per nominal inch of valve size with a maximum limit of 5 gpm. The previous criterion of 1 gpm for all valve sizes imposed an unjustified penalty on the larger valves without providing information on potential valve degradation and resulted in higher personnel radiation exposures. A study concluded a leakage rate limit based on valve size was superior to a single allowable value.

Reference 7 permits leakage testing at a lower pressure differential than between the specified maximum RCS pressure and the normal pressure of the connected system during RCS operation (the maximum pressure differential) in those types of valves in which the higher service pressure will tend to diminish the overall leakage channel opening. In such cases, the observed

(continued)

BASES

LCO (continued)

rate may be adjusted to the maximum pressure differential by assuming leakage is directly proportional to the pressure differential to the one half power.

The ACIs and OPIs for RHR System Valves 730 and 731 are OPERABLE when they will automatically close and prevent re-opening of the two RHR suction isolation valves when RCS pressure exceeds the setpoints specified in SR 3.4.14.2 and SR 3.4.14.3. The ACIs and OPIs are OPERABLE when the isolation valves are closed and the motor operators de-energized if the interlocks will function as soon as power is restored to the motor operator.

APPLICABILITY

In MODES 1, 2, 3, and 4, this LCO applies because the PIV leakage potential is greatest when the RCS is pressurized. In MODE 4, valves in the RHR flow path are not required to meet the leakage limit requirements of this LCO when in, or during the transition to or from, the RHR mode of operation. The ACI and OPI functions are required in MODES 1, 2 and 3 to ensure that both RHR suction valves are closed and remain closed in those MODES. The ACI and OPI functions are required in MODE 4 to ensure that both RHR suction valves are closed when RCS pressure is increased after the RHR System is no longer being used for decay heat removal.

In MODES 5 and 6, leakage limits and RHR ACI and OPI functions are not provided because the lower reactor coolant pressure results in a reduced potential for leakage and for a LOCA outside the containment.

ACTIONS

The Actions are modified by three Notes. Note 1 provides clarification that each flow path allows separate entry into a Condition. This is allowed based upon the functional independence of the flow path. Note 2 provides clarification that separate entry into Condition C is allowed for the ACI and the OPI on each RHR suction isolation valve. This is acceptable because these interlocks are a backup to administrative controls that ensure the valves are closed when required. Note 3 requires an evaluation of affected systems if a PIV is inoperable. The leakage may have affected system operability, or isolation of a

(continued)

BASES

ACTIONS (continued)

leaking flow path with an alternate valve may have degraded the ability of the interconnected system to perform its safety function.

A.1 and A.2

The flow path must be isolated by two valves. Required Actions A.1 and A.2 are modified by a Note that the valves used for isolation must meet the same leakage requirements as the PIVs and must be within the RCPB or the high pressure portion of the system.

Required Action A.1 requires that the isolation with one valve must be performed within 4 hours. Four hours provides time to reduce leakage in excess of the allowable limit and to isolate the affected system if leakage cannot be reduced. The 4 hour Completion Time allows the actions and restricts the operation with leaking isolation valves.

Required Action A.2 specifies that the double isolation barrier of two valves be restored by closing some other valve qualified for isolation or restoring one leaking PIV. The 72 hour Completion Time after exceeding the limit considers the time required to complete the Action and the low probability of a second valve failing during this time period. If use of a closed manual, deactivated automatic, or check valve to isolate leaking PIV renders a required system or component inoperable, then the Required Actions associated with the affected system or component are initiated when the valve is closed.

B.1 and B.2

If leakage cannot be reduced, the system isolated, or the other Required Actions accomplished, the plant must be brought to a MODE in which the requirement does not apply. To achieve this status, the plant must be brought to MODE 3 within 6 hours and MODE 5 within 36 hours. This Action may reduce the leakage and also reduces the potential for a LOCA outside the containment.

(continued)

BASES

ACTIONS

B.1 and B.2 (continued)

The allowed Completion Times are reasonable based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

C.1 and C.2

The inoperability of one or more ACIs or OPIs renders the RHR suction isolation valves incapable of isolating in response to a high pressure condition and/or incapable of preventing inadvertent opening of the valves at RCS pressures in excess of the RHR systems design pressure. If one or more RHR ACIs or OPIs are inoperable, operation may continue as long as the affected RHR isolation valve is closed and de-activated within 7 days and that status re-verified every 31 days thereafter. These Required Actions and associated Completion Times are acceptable in MODES 1, 2 and 3 because the ACIs or OPIs are backups to administrative controls that ensure both RHR suction isolation valves are closed and de-activated during normal plant operation. These Required Actions and associated Completion Times are acceptable in MODE 4 because the ACIs and OPIs do not perform any safety function in MODE 4 and are required only to ensure that both RHR suction valves are closed when RCS pressure is increased after the RHR System is no longer being used for decay heat removal. When the ACIs and OPIs are inoperable in MODE 4, the 7 day Completion Time provides adequate time to repair the interlock or to complete a plant cooldown to place the plant outside the applicable MODES.

Required Action C.1 is modified by a Note that allows RHR System suction isolation valves that are closed in accordance with Required Action C.1 to be opened for 7 days following entry into MODE 4 from MODE 3. This allowance is needed so that the RHR system is available to support plant cooldown. This allowance is acceptable because the ACIs and OPIs do not perform any safety function in MODE 4 other than to ensure that both RHR suction valves are closed when RCS pressure is increased after the RHR System is no longer being used for decay heat removal.

(continued)

BASES (continued)

SURVEILLANCE REQUIREMENTS

SR 3.4.14.1

Performance of leakage testing on each RCS PIV or isolation valve used to satisfy Required Action A.1 and Required Action A.2 is required to verify that leakage is below the specified limit and to identify each leaking valve. The leakage limit of 0.5 gpm per inch of nominal valve diameter up to 5 gpm maximum applies to each valve. Leakage testing requires a stable pressure condition.

For the two PIVs in series, the leakage requirement applies to each valve individually and not to the combined leakage across both valves. If the PIVs are not individually leakage tested, one valve may have failed completely and not be detected if the other valve in series meets the leakage requirement. In this situation, the protection provided by redundant valves would be lost.

Testing is to be performed every 24 months, a typical refueling cycle, if the plant does not go into MODE 5 for at least 7 days. The 24 month Frequency is consistent with 10 CFR 50.55a(g) (Ref. 8) as contained in the Inservice Testing Program, is within frequency allowed by the American Society of Mechanical Engineers (ASME) Code, Section XI (Ref. 7), and is based on the need to perform such surveillances under the conditions that apply during an outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power.

In addition, testing must be performed once after the valve has been opened by flow or exercised to ensure tight reseating. PIVs disturbed in the performance of this Surveillance should also be tested unless documentation shows that an infinite testing loop cannot practically be avoided. Testing must be performed within 24 hours after the valve has been reseated. Within 24 hours is a reasonable and practical time limit for performing this test after opening or reseating a valve.

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BASES

SURVEILLANCE REQUIREMENTS

SR 3.4.14.1 (continued)

The leakage limit is to be met at the RCS pressure associated with MODES 1 and 2. This permits leakage testing at high differential pressures with stable conditions not possible in the MODES with lower pressures.

Entry into MODES 3 and 4 is allowed to establish the necessary differential pressures and stable conditions to allow for performance of this Surveillance. The Note that allows this provision is complementary to the Frequency of prior to entry into MODE 2 whenever the unit has been in MODE 5 for 7 days or more, if leakage testing has not been performed in the previous 12 months. In addition, this Surveillance is not required to be performed on the RHR System when the RHR System is aligned to the RCS in the shutdown cooling mode of operation. PIVs contained in the RHR shutdown cooling flow path must be leakage rate tested after RHR is secured and stable unit conditions and the necessary differential pressures are established.

SR 3.4.14.2 and SR 3.4.14.3

Verifying that ACI and OPI function at the required setpoints ensures that both RHR suction isolation valves will be closed and remain closed when RCS pressure is increased after the RHR System is no longer being used for decay heat removal.

The 24 month Frequency is based on the need to perform the Surveillance under conditions that apply during a plant outage. The 24 month Frequency is also acceptable based on consideration of the design reliability (and confirming operating experience) of the equipment.

REFERENCES

1. 10 CFR 50.2.

2. 10 CFR 50.55a(c).

3. 10 CFR 50, Appendix A.

(continued)

BASES

REFERENCES (continued)

4. WASH-1400 (NUREG-75/014), Appendix V, October 1975.

5. NUREG-0677, May 1980.

6. FSAR Section 6.2.

7. ASME, Boiler and Pressure Vessel Code, Section XI.

8. 10 CFR 50.55a(g).

9. Generic Letter 87-006, Periodic Verification of Leak Tight Integrity of Pressure Isolation Valves.

10. WCAP-11736-A, Residual Heat Removal System Autoclosure Interlock (ACI) Removal Report.

B 3.4 REACTOR COOLANT SYSTEM (RCS)

B 3.4.15 RCS Leakage Detection Instrumentation

BASES

BACKGROUND

GDC 30 of Appendix A to 10 CFR 50 (Ref. 1) requires means for detecting and, to the extent practical, identifying the location of the source of RCS LEAKAGE.

Leakage detection systems must have the capability to detect significant reactor coolant pressure boundary (RCPB) degradation as soon after occurrence as practical to minimize the potential for propagation to a gross failure. Thus, an early indication or warning signal is necessary to permit proper evaluation of all unidentified LEAKAGE.

Industry practice has shown that water flow changes of 0.5 to 1.0 gpm can be readily detected in contained volumes by monitoring changes in water level, in flow rate, or in the operating frequency of a pump. The containment sump used to collect unidentified LEAKAGE and containment fan cooler unit condensate measuring system are instrumented to alarm for increases of 0.5 to 1.0 gpm. This sensitivity is acceptable for detecting increases in unidentified LEAKAGE.

The reactor coolant contains radioactivity that, when released to the containment, can be detected by radiation monitoring instrumentation. Reactor coolant radioactivity levels will be low during initial reactor startup and for a few weeks thereafter, until activated corrosion products have been formed and fission products appear from fuel element cladding contamination or cladding defects. Instrument sensitivities of 10^{-11} μCi/cc radioactivity for particulate monitoring and of 10^{-7} μCi/cc radioactivity for gaseous monitoring are practical for these leakage detection systems. Radioactivity detection systems are included for monitoring both particulate (R-11) and gaseous activities (R-12) because of their sensitivities and rapid responses to RCS LEAKAGE.

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BASES

BACKGROUND (continued)

An increase in humidity of the containment atmosphere would indicate release of water vapor to the containment. Dew point temperature measurements can thus be used to monitor humidity levels of the containment atmosphere as an indicator of potential RCS LEAKAGE. A 1°F increase in dew point is well within the sensitivity range of available instruments.

Since the humidity level is influenced by several factors, a quantitative evaluation of an indicated leakage rate by this means may be questionable and should be compared to observed increases in liquid flow into or from the containment sump and condensate flow from fan cooler unit condensate measuring system. Humidity level monitoring is considered most useful as an indirect alarm or indication to alert the operator to a potential problem. Humidity monitors are not required by this LCO.

Air temperature and pressure monitoring methods may also be used to infer unidentified LEAKAGE to the containment. Containment temperature and pressure fluctuate slightly during plant operation, but a rise above the normally indicated range of values may indicate RCS leakage into the containment. The relevance of temperature and pressure measurements are affected by containment free volume and, for temperature, detector location. Alarm signals from these instruments can be valuable in recognizing rapid and sizable leakage to the containment. Temperature and pressure monitors are not required by this LCO.

APPLICABLE SAFETY ANALYSES

The need to evaluate the severity of an alarm or an indication is important to the operators, and the ability to compare and verify with indications from other systems is necessary. The system response times and sensitivities are described in the FSAR (Ref. 2).

The safety significance of RCS LEAKAGE varies widely depending on its source, rate, and duration. Therefore, detecting and monitoring RCS LEAKAGE into the containment area is necessary.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

Quickly separating the identified LEAKAGE from the unidentified LEAKAGE provides quantitative information to the operators, allowing them to take corrective action should a leakage occur detrimental to the safety of the unit and the public.

RCS leakage detection instrumentation satisfies Criterion 1 of 10 CFR 50.36.

LCO

One method of protecting against large RCS leakage derives from the ability of instruments to rapidly detect extremely small leaks. This LCO requires instruments of diverse monitoring principles to be OPERABLE to provide a high degree of confidence that extremely small leaks are detected in time to allow actions to place the plant in a safe condition, when RCS LEAKAGE indicates possible RCPB degradation.

The LCO is satisfied when monitors of diverse measurement means are available. Thus, the containment sump flow monitor, in combination with a gaseous or particulate radioactivity monitor and a containment fan cooler unit condensate measuring system, provides an acceptable minimum. The condensate measuring system associated with any one of the fan cooler unit satisfies the requirement for a fan cooler unit condensate measuring system.

APPLICABILITY

Because of elevated RCS temperature and pressure in MODES 1, 2, 3, and 4, RCS leakage detection instrumentation is required to be OPERABLE.

In MODE 5 or 6, the temperature is to be ≤ 200°F and pressure is maintained low or at atmospheric pressure. Since the temperatures and pressures are far lower than those for MODES 1, 2, 3, and 4, the likelihood of leakage and crack propagation are much smaller. Therefore, the requirements of this LCO are not applicable in MODES 5 and 6.

(continued)

BASES (continued)

ACTIONS

The Actions are modified by a Note that indicates that the provisions of LCO 3.0.4 are not applicable. As a result, a MODE change is allowed when the required monitors are inoperable. This allowance is provided because other instrumentation is available to monitor for RCS leakage.

A.1 and A.2

With the required containment sump flow monitor inoperable, no other form of sampling can provide the equivalent information; however, the containment atmosphere radioactivity monitor or containment fan cooler unit will provide indications of changes in leakage. Together with the atmosphere monitor, the periodic surveillance for RCS water inventory balance, SR 3.4.13.1, must be performed at an increased frequency of 24 hours to provide information that is adequate to detect leakage.

Restoration of the required sump flow monitor to OPERABLE status within a Completion Time of 30 days is required to regain the function after the monitor's failure. This time is acceptable, considering the Frequency and adequacy of the RCS water inventory balance required by Required Action A.1.

B.1.1, B.1.2, B.2.1 and B.2.2

With both gaseous and particulate containment atmosphere radioactivity monitoring instrumentation channels inoperable, alternative action is required. Either grab samples of the containment atmosphere must be taken and analyzed or water inventory balances, in accordance with SR 3.4.13.1, must be performed to provide alternate periodic information.

With a sample obtained and analyzed or water inventory balance performed every 24 hours, the reactor may be operated for up to 30 days to allow restoration of the required containment atmosphere radioactivity monitors. Alternatively, continued operation is allowed if the air cooler unit condensate measuring system is OPERABLE, provided grab samples are taken or water inventory balance performed every 24 hours.

(continued)

BASES

ACTIONS

B.1.1, B.1.2, B.2.1 and B.2.2 (continued)

The 24 hour interval provides periodic information that is adequate to detect leakage. The 30 day Completion Time recognizes at least one other form of leakage detection is available.

C.1 and C.2

With the required containment fan cooler unit condensate measuring system inoperable, alternative action is again required. Either SR 3.4.15.1 must be performed or water inventory balances, in accordance with SR 3.4.13.1, must be performed to provide alternate periodic information. Provided a CHANNEL CHECK is performed every 8 hours or a water inventory balance is performed every 24 hours, reactor operation may continue while awaiting restoration of the containment fan cooler unit condensate measuring system to OPERABLE status.

The 24 hour interval provides periodic information that is adequate to detect RCS LEAKAGE.

D.1 and D.2

With the required containment atmosphere radioactivity monitor and the required containment fan cooler unit condensate measuring system inoperable, the only means of detecting leakage is the containment sump flow monitor. This Condition does not provide the required diverse means of leakage detection. The Required Action is to restore either of the inoperable required monitors to OPERABLE status within 30 days to regain the intended leakage detection diversity. The 30 day Completion Time ensures that the plant will not be operated in a reduced configuration for a lengthy time period.

(continued)

BASES

ACTIONS (continued)

E.1 and E.2

If a Required Action of Condition A, B, C, or D cannot be met, the plant must be brought to a MODE in which the requirement does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours.

The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

F.1

With all required monitors inoperable, no automatic means of monitoring leakage are available, and immediate plant shutdown in accordance with LCO 3.0.3 is required.

SURVEILLANCE REQUIREMENTS

SR 3.4.15.1

SR 3.4.15.1 requires the performance of a CHANNEL CHECK of the required containment atmosphere radioactivity monitor. The check gives reasonable confidence that the channel is operating properly. The Frequency of 12 hours is based on instrument reliability and is reasonable for detecting off normal conditions.

SR 3.4.15.2

SR 3.4.15.2 requires the performance of a COT on the required containment atmosphere radioactivity monitor. The test ensures that the monitor can perform its function in the desired manner. The test verifies the alarm setpoint and relative accuracy of the

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.4.15.2 (continued)

instrument string. The Frequency of 92 days considers instrument reliability, and operating experience has shown that it is proper for detecting degradation.

SR 3.4.15.3, SR 3.4.15.4 and SR 3.4.15.5

These SRs require the performance of a CHANNEL CALIBRATION for each of the RCS leakage detection instrumentation channels. The calibration verifies the accuracy of the instrument string, including the instruments located inside containment. The Frequency of 24 months is a typical refueling cycle and considers channel reliability. Again, operating experience has proven that this Frequency is acceptable.

REFERENCES

1. 10 CFR 50, Appendix A, Section IV, GDC 30.

2. FSAR, Section 6.

B 3.4 REACTOR COOLANT SYSTEM (RCS)

B 3.4.16 RCS Specific Activity

BASES

BACKGROUND

The maximum dose to the whole body and the thyroid that an individual at the site boundary can receive for 2 hours during an accident is specified in 10 CFR 100 (Ref. 1). The limits on specific activity ensure that the doses are held to a small fraction of the 10 CFR 100 limits during analyzed transients and accidents.

The RCS specific activity LCO limits the allowable concentration level of radionuclides in the reactor coolant. The LCO limits are established to minimize the offsite radioactivity dose consequences in the event of a steam generator tube rupture (SGTR) accident.

The LCO contains specific activity limits for both DOSE EQUIVALENT I-131 and gross specific activity. The allowable levels are intended to limit the 2 hour dose at the site boundary to a small fraction of the 10 CFR 100 dose guideline limits. The limits in the LCO are standardized, based on parametric evaluations of offsite radioactivity dose consequences for typical site locations.

The parametric evaluations showed the potential offsite dose levels for a SGTR accident were an appropriately small fraction of the 10 CFR 100 dose guideline limits. Each evaluation assumes a broad range of site applicable atmospheric dispersion factors in a parametric evaluation.

APPLICABLE SAFETY ANALYSES

The LCO limits on the specific activity of the reactor coolant ensures that the resulting 2 hour doses at the site boundary will not exceed a small fraction of the 10 CFR 100 dose guideline limits following a SGTR accident. The SGTR safety analysis (Ref. 2) assumes the specific activity of the reactor

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

coolant at the LCO limit and an existing reactor coolant steam generator (SG) tube leakage rate of 1 gpm. The safety analysis assumes the specific activity of the secondary coolant at its limit of 0.1 μCi/gm DOSE EQUIVALENT I-131 from LCO 3.7.17, "Secondary Specific Activity."

The analysis for the SGTR accident establishes the acceptance limits for RCS specific activity. Reference to this analysis is used to assess changes to the unit that could affect RCS specific activity, as they relate to the acceptance limits.

The analysis is for two cases of reactor coolant specific activity. One case assumes specific activity at 1.0 μCi/gm DOSE EQUIVALENT I-131 with a concurrent large iodine spike that increases the I-131 activity in the reactor coolant by a factor of about 50 immediately after the accident. The second case assumes the initial reactor coolant iodine activity at 60.0 μCi/gm DOSE EQUIVALENT I-131 due to a pre-accident iodine spike caused by an RCS transient. In both cases, the noble gas activity in the reactor coolant assumes 1% failed fuel, which closely equals the LCO limit of 100/E(bar) μCi/gm for gross specific activity.

The analysis also assumes a loss of offsite power at the same time as the SGTR event. The SGTR causes a reduction in reactor coolant inventory. The reduction initiates a reactor trip from a low pressurizer pressure signal or an RCS overtemperature ΔT signal.

The coincident loss of offsite power causes the steam dump valves to close to protect the condenser. The rise in pressure in the ruptured SG discharges radioactively contaminated steam to the atmosphere through the SG atmospheric dump valves (ADVs) and the main steam safety valves. The unaffected SGs remove core decay heat by venting steam to the atmosphere until the cooldown ends.

The safety analysis shows the radiological consequences of an SGTR accident are within a small fraction of the Reference 1 dose

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

guideline limits. Operation with iodine specific activity levels greater than the LCO limit is permissible, if the activity levels do not exceed the limits shown in Figure 3.4.16-1, in the applicable specification, for more than 48 hours. The safety analysis has concurrent and pre-accident iodine spiking levels up to 60.0 μCi/gm DOSE EQUIVALENT I-131.

The remainder of the above limit permissible iodine levels shown in Figure 3.4.16-1 are acceptable because of the low probability of a SGTR accident occurring during the established 48 hour time limit. The occurrence of an SGTR accident at these permissible levels could increase the site boundary dose levels, but still be within 10 CFR 100 dose guideline limits.

The limits on RCS specific activity are also used for establishing standardization in radiation shielding and plant personnel radiation protection practices.

RCS specific activity satisfies Criterion 2 of 10 CFR 50.36.

LCO

The specific iodine activity is limited to 1.0 μCi/gm DOSE EQUIVALENT I-131, and the gross specific activity in the reactor coolant is limited to the number of μCi/gm equal to 100 divided by E(bar) (average disintegration energy of the sum of the average beta and gamma energies of the coolant nuclides). The limit on DOSE EQUIVALENT I-131 ensures the 2 hour thyroid dose to an individual at the site boundary during the Design Basis Accident (DBA) will be a small fraction of the allowed thyroid dose. The limit on gross specific activity ensures the 2 hour whole body dose to an individual at the site boundary during the DBA will be a small fraction of the allowed whole body dose.

The SGTR accident analysis (Ref. 2) shows that the 2 hour site boundary dose levels are within acceptable limits. Violation of the LCO may result in reactor coolant radioactivity levels that could, in the event of an SGTR, lead to site boundary doses that exceed the 10 CFR 100 dose guideline limits.

(continued)

BASES (continued)

APPLICABILITY

In MODES 1 and 2, and in MODE 3 with RCS average temperature ≥ 500°F, operation within the LCO limits for DOSE EQUIVALENT I-131 and gross specific activity are necessary to contain the potential consequences of an SGTR to within the acceptable site boundary dose values.

For operation in MODE 3 with RCS average temperature < 500°F, and in MODES 4 and 5, the release of radioactivity in the event of a SGTR is unlikely since the saturation pressure of the reactor coolant is below the lift pressure settings of the main steam safety valves.

ACTIONS

A.1 and A.2

With the DOSE EQUIVALENT I-131 greater than the LCO limit, samples at intervals of 4 hours must be taken to demonstrate that the limits of Figure 3.4.16-1 are not exceeded. The Completion Time of 4 hours is required to obtain and analyze a sample. Sampling is done to establish the trend.

The DOSE EQUIVALENT I-131 must be restored to within limits within 48 hours. The Completion Time of 48 hours is required to allow operation to continue, if the limit violation resulted from normal iodine spiking.

A Note to the Required Actions of Condition A excludes the MODE change restriction of LCO 3.0.4. This exception allows entry into the applicable MODE(S) while relying on the ACTIONS even though the ACTIONS may eventually require plant shutdown. This exception is acceptable due to the significant conservatism incorporated into the specific activity limit, the low probability of an event which is limiting due to exceeding this limit, and the ability to restore transient specific activity excursions while the plant remains at, or proceeds to power operation.

(continued)

BASES

ACTIONS (continued)

B.1

With the gross specific activity in excess of the allowed limit, the unit must be placed in a MODE in which the requirement does not apply.

Placing the plant in MODE 3 with RCS average temperature < 500°F lowers the saturation pressure of the reactor coolant below the setpoints of the main steam safety valves and prevents venting the SG to the environment in an SGTR event. The allowed Completion Time of 6 hours is reasonable, based on operating experience, to reach MODE 3 below 500°F from full power conditions in an orderly manner and without challenging plant systems.

C.1

If a Required Action and the associated Completion Time of Condition A is not met or if the DOSE EQUIVALENT I-131 is in the unacceptable region of Figure 3.4.16-1, the reactor must be brought to MODE 3 with RCS average temperature < 500°F within 6 hours. The Completion Time of 6 hours is reasonable, based on operating experience, to reach MODE 3 below 500°F from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE REQUIREMENTS

SR 3.4.16.1

SR 3.4.16.1 requires performing a gamma isotopic analysis as a measure of the gross specific activity of the reactor coolant at least once every 7 days. While basically a quantitative measure of radionuclides with half lives longer than 10 minutes, excluding iodines, this measurement is the sum of the degassed gamma activities and the gaseous gamma activities in the sample taken. This Surveillance provides an indication of any increase in gross specific activity.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.4.16.1 (continued)

Trending the results of this Surveillance allows proper remedial action to be taken before reaching the LCO limit under normal operating conditions. The Surveillance is applicable in MODES 1 and 2, and in MODE 3 with T_{avg} at least 500°F. The 7 day Frequency considers the low probability of a gross fuel failure during the time.

SR 3.4.16.2

This Surveillance is performed in MODE 1 only to ensure iodine remains within limit during normal operation and following fast power changes when fuel failure is more apt to occur. The 14 day Frequency is adequate to trend changes in the iodine activity level, considering gross activity is monitored every 7 days. The Frequency, between 2 and 6 hours after a power change ≥ 15% RTP within a 1 hour period, is established because the iodine levels peak during this time following fuel failure; samples at other times would provide inaccurate results.

SR 3.4.16.3

A radiochemical analysis for E(bar) determination is required every 184 days (6 months) with the plant operating in MODE 1 equilibrium conditions. The E(bar) determination directly relates to the LCO and is required to verify plant operation within the specified gross activity LCO limit. The analysis for E(bar) is a measurement of the average energies per disintegration for isotopes with half lives longer than 10 minutes, excluding iodines and non-gamma emitters. The 10 minute limit on half-lives ensures that Xenon-138 is included in the determination of E(bar). The Frequency of 184 days recognizes E(bar) does not change rapidly.

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BASES

SURVEILLANCE REQUIREMENTS

SR 3.4.16.3 (continued)

This SR has been modified by a Note that indicates sampling is required to be performed within 31 days after a minimum of 2 effective full power days and 20 days of MODE 1 operation have elapsed since the reactor was last subcritical for at least 48 hours. This ensures that the radioactive materials are at equilibrium so the analysis for E(bar) is representative and not skewed by a crud burst or other similar event.

REFERENCES

1. 10 CFR 100.11, 1973.

2. FSAR, Section 14.2.