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W3F1-2001-0011
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PR

February 19, 2001

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

Subject: Waterford 3 SES
Docket No. 50-382
License No. NPF-38
Technical Specification Change Request NPF-38-229
Containment Vacuum Relief Valve Allowed Outage Time Extension

Gentlemen:

In accordance with 10 CFR 50.90, Entergy Operations, Inc. (Entergy) is hereby proposing to amend Operating License NPF-38 for Waterford 3 by requesting the NRC Staff's review and approval of the attached changes to the Technical Specifications (TS) and the Operating License. The attached description and safety analyses support the proposed changes.

The proposed change to the Technical Specifications modifies TS 3.6.5, "Vacuum Relief Valves," limiting condition for operation and extends the allowed outage time from 4-hours to 72-hours for returning an inoperable primary containment to annulus vacuum relief valve to OPERABLE status. The primary intent of the proposed TS change is to facilitate compliance with TS 4.0.5 without placing the plant at risk for an unnecessary forced shutdown. The extended allowed outage time will provide sufficient time to perform the required surveillance operability tests and make any required adjustments on the primary containment to annulus vacuum relief valves.

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Technical Specification Change Request NPF-38-229
Containment Vacuum Relief Valve Allowed Outage Time Extension
W3F1-2001-0011
Page 2
February 19, 2001

In addition, Entergy proposes to delete Attachment 1 to the Waterford 3 Operating License and revise Condition 2.C.1 to reflect the deletion. The license condition required the modification of the containment vacuum relief sensing lines prior to startup following refueling outage number 8. The required modifications have been completed.

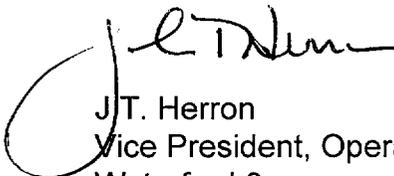
The proposed changes have been evaluated in accordance with 10CFR50.91(a)(1) using criteria in 10CFR50.92(c) and it has been determined that this change involves no significant hazards considerations. The bases for these determinations are included in the attached submittal.

The circumstances surrounding this change do not meet the NRC Staff criteria for exigent or emergency review however due to the frequency of the required testing Entergy requests an expeditious review and approval. Entergy also requests the effective date for this TS change be within 60 days of approval.

The proposed change introduces no new commitments. Should you have any questions or comments concerning this request, please contact D. Bryan Miller at (504) 739-6692.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 19, 2001.

Very truly yours,



J.T. Herron
Vice President, Operations
Waterford 3

JTH/DBM/ssf
Attachment: NPF-38-229

cc: E.W. Merschoff (NRC Region IV), N. Kalyanam (NRC-NRR),
J. Smith, N.S. Reynolds, NRC Resident Inspectors Office,
Louisiana DEQ/Surveillance Division, American Nuclear Insurers

ATTACHMENT

TO

W3F1-2001-0011

PROPOSED TECHNICAL SPECIFICATION

AND

RESPECTIVE SAFETY ANALYSES

IN THE MATTER OF AMENDING

NPF-38

ENTERGY OPERATIONS, INC.

DOCKET NO. 50-382

DESCRIPTION OF PROPOSED CHANGES

The proposed change modifies Technical Specification (TS) 3.6.5, "Vacuum Relief Valves," as follows:

- The limiting condition for operations (LCO) will be changed to read, "Two vacuum relief lines shall be operable."
- The current 4-hour allowed outage time (AOT) specified in the action statement will be extended to 72-hours.
- The action will be reworded in terms of a "vacuum relief line" vice "primary containment to annulus vacuum relief valve."

This TS change is modeled after the guidelines of TS 3.6.12, "Vacuum Relief Valves," in NUREG 1432, "Standard Technical Specifications - Combustion Engineering Plants." Proposed Bases changes are included for information only in support of this change.

The proposed change also deletes attachment 1 to the Operating License, removing the license condition requiring the modification of the containment vacuum relief sensing lines prior to startup following refueling outage number 8. The required modifications have been completed.

BACKGROUND

The containment vacuum relief system protects the containment vessel against negative pressure (i.e., a lower pressure inside than outside.) The containment vessel is designed for an external pressure differential of 0.65 psi at 120 Deg F. During normal plant operation, the containment vessel is vented and cooled as required to eliminate pressure fluctuations caused by air temperature changes. The shield building annulus is maintained at a negative pressure by the annulus negative pressure system. An excessive negative pressure condition inside containment can occur if there is an inadvertent actuation of the containment spray system during normal operation and the containment vacuum relief system fails to perform its function.

The containment pressure vessel contains two 100% vacuum relief lines installed in parallel that protect the containment from excessive external loading. The vacuum relief lines are 24-inch penetrations that connect the shield building annulus to the containment. The penetrations provide a flow path between the

annulus and the containment. Each of the redundant lines making up the containment vacuum relief system is functionally independent of one another. Each penetration has its own set of dual function in-series isolation valves that include one 24-inch pneumatically operated butterfly valve and one 24-inch check valve.

The butterfly valve's primary (active) safety function is containment vacuum relief protection by mitigating the consequences of excessive negative pressure inside containment due to an inadvertent actuation of the containment spray system. The butterfly valve's secondary (passive) safety function is to function as a containment isolation valve. These valves are normally closed during normal power operation and will fail closed on a loss of power. These valves do not receive an automatic containment isolation signal to close, but would close once their primary safety function has been accomplished.

The pneumatically operated butterfly valves are installed on the shield building annulus side of the containment penetration and serve as automatic vacuum relief valves as well as containment isolation valves. Each butterfly valve is actuated by a separate pressure controller that senses the differential pressure between the containment and the annulus. Each butterfly valve is provided with an air accumulator enabling the valve to open following a loss of instrument air.

The check valves are installed on the containment side of the penetration to protect the containment against excessive external pressure, prevent backflow of containment air to the annulus, and serve as containment isolation valves. The check valves have magnetic latches that holds the valve swing plate firmly in the closed position until required to open due to a small positive external containment differential pressure. The magnetic latches plus gravity assure the valves remain shut to fulfill their function as containment isolation valves.

The check valves are set to open at 1.1 in. w.g. differential. If the pressure differential between the annulus and the containment atmosphere continues to increase (containment pressure lower than the annulus), both butterfly valves are automatically opened by separate differential pressure transmitters at ≤ 8.5 in. w.g. to allow the air pressure in the annulus to bleed into the containment. Separate sets of differential pressure transmitters provide backup signals to open the butterfly valves at 10 in. w.g. The butterfly valves reclose before the differential pressure decreases to 6.25 in. w.g.

In 1997 the Waterford 3 Inservice Testing (IST) Program was upgraded to comply with the 1989 Edition of ASME Section XI as mandated by 10 CFR

50.55(a). The 1989 Edition of ASME Section XI requires that primary containment vacuum relief valves be tested at six month intervals and provides specific testing requirements. This new test interval and testing requirements were not initially identified when the IST Program was updated in 1997 but were identified later in 1999 (reference Waterford 3 licensee event report (LER) 99-003-00.)

An IST Program relief request was submitted to the NRC staff via letter W3F1-2000-0175 on December 19, 2000 for those new test requirements deemed impractical to perform during plant operations. Relief was requested for those tests that must be performed locally at the valves such as verification of the remote position indication accessories, check valve opening pressure, and check valve open and close capability. Relief was not requested however for the six month requirement to actuate the pneumatically operated butterfly valves and verify their actuation setpoint. This test can be performed remotely within the 4 hour AOT of TS 3.6.5 from outside the containment. However, if there are any test delays or required adjustments, the 4 hour AOT could be exceeded requiring the initiation of an unnecessary forced shutdown.

License amendment 128 added a license condition to the Waterford 3 Operating License requiring the modification of the containment vacuum relief (CVR) sensing lines. These modifications became necessary when it was discovered that the plant configuration did not agree with information provided to the NRC staff during the initial licensing process. A resolution was proposed by Entergy Operations, Inc. to address these discrepancies. Amendment 128, issued on May 20, 1997, approved the proposed resolution and imposed the license condition. The modifications required by the license condition were completed during refueling outage number 8.

BASIS FOR PROPOSED CHANGE

Currently, TS 3.6.5 requires the primary containment to annulus vacuum relief valves to be operable with an actuation setpoint of less than or equal to 0.307 psid (8.5 inches H₂O). With one primary containment to annulus vacuum relief valve inoperable, the valve must be returned to operable status within 4 hours or the plant placed in hot standby within the next 6 hours and in cold shutdown within the following 30 hours.

The proposed change will require two vacuum relief lines to be operable and allow up to 72 hours to restore an inoperable line to operable status.

The proposed change to the LCO aligns the wording with NUREG-1432 and requires the same equipment to be operable as the current LCO. The LCO establishes the minimum equipment required to accomplish the vacuum relief function following the inadvertent actuation of the containment spray system, assuming a single active failure. Two vacuum relief lines are required to be operable to ensure that at least one is available, assuming one or both valves in the other line fail to open.

The proposed AOT extension facilitates compliance with TS 4.0.5 (IST Program testing) without placing the plant at risk for a forced shutdown by providing sufficient time to perform the required surveillance operability tests and any required adjustments on the primary containment to annulus vacuum relief valves. In addition, the extended AOT will allow flexibility in the performance of potential on-line maintenance and repair during plant operation in Modes 1, 2, 3, and 4 and reduce the potential for a notice of enforcement discretion (NOED) request to prevent an unnecessary plant shutdown. The AOT extension is modeled after the guidelines of TS 3.6.12, "Vacuum Relief Valves," in NUREG 1432. These guidelines specify the 72-hour time period is consistent with other LCOs for the loss of one train of a system required to mitigate the consequences of a loss of coolant accident (LOCA) or other design basis accidents.

The proposed change is based on the existing design basis accident analysis involving an inadvertent containment spray system actuation during normal plant operation that can reduce the atmospheric temperature (and hence pressure) inside containment. The analysis is contained in FSAR, Revision 10, Section 6.2.1.1.3. Conservative assumptions are used for pertinent parameters in the analysis, e.g.:

- Both trains of containment spray are assumed to inadvertently start spraying water at the maximum flow rate.
- The spray water temperature is assumed to be 50 °F, which is less than the minimum temperature allowed by TS 3.5.4, Refueling Water Storage Pool.
- All four containment fan coolers are assumed to operate at maximum heat removal rate.
- No credit is taken for the heat loads in the containment.
- The maximum initial allowed containment temperature is assumed.
- One vacuum relief line fails to open.

The inadvertent actuation of the containment spray system was analyzed to determine the resulting reduction in containment pressure. The initial pressure condition used in this analysis was 14.25 psia. The analysis shows that, with one of the two redundant vacuum relief lines failing to open, the resultant peak containment calculated external pressure load is 0.49 psi which is less than the design external pressure load equivalent of 0.65 psi.

The proposed deletion of the license condition contained in attachment 1 to the Operating License is acceptable because the condition has been satisfied by the completion of the required modifications.

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

Entergy Operations, Inc. is proposing that the Waterford 3 Operating License be amended to modify Technical Specification (TS) 3.6.5, "Vacuum Relief Valves" as follows:

- Change the limiting condition for operation (LCO) to read, "Two vacuum relief lines shall be operable."
- Extend the current 4-hour allowed outage time (AOT) specified in the action statement to 72-hours.
- Reword the action in terms of a "vacuum relief line" vice "primary containment to annulus vacuum relief valve."

Entergy Operations, Inc. is also proposing that attachment 1 of the Operating License be deleted. Attachment 1 documented a license condition requiring the modification of the containment vacuum relief sensing lines. The required modifications have been implemented.

An evaluation of the proposed change has been performed in accordance with 10CFR50.91(a)(1) regarding no significant hazards considerations using the standards in 10CFR50.92(c). A discussion of these standards as they relate to this amendment request follows:

- 1. Will operation of the facility in accordance with this proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?**

The proposed changes do not create any new system interactions and have no impact on operation or function of any system or equipment in a way that could cause an accident. The primary containment to annulus vacuum relief valves are part of the containment vacuum relief system and are not initiators of any events nor affect any accident initiators of any events previously analyzed in Chapter 15 of the FSAR.

The primary containment to annulus vacuum relief valves are designed to mitigate the consequences of an inadvertent containment spray system actuation during normal plant operation. The FSAR analysis determined that with one of the two containment vacuum lines failed, the resultant peak calculated external pressure load of 0.49 psi on the containment was less than the design external pressure loading of 0.65 psi. These proposed changes do not affect any of the assumptions used in the analysis. Hence, the consequences of the design basis accident previously evaluated do not change.

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

2. Will operation of the facility in accordance with this proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed changes do not alter the design, configuration, or method of operation of the plant. There is no change being made to the parameters within which the plant is operated. The setpoints at which the protective or mitigative actions are initiated are unaffected by this change. As such, no new failure modes are being introduced that would involve any potential initiating events that would create any new or different kind of accident.

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

3. Will operation of the facility in accordance with this proposed change involve a significant reduction in a margin of safety?

The proposed changes do not affect the bases used in or the results of the analysis to establish the margin of safety. The margin of safety is established through equipment design, operating parameters, and the setpoints at which automatic actions are initiated. None of these are

impacted by the proposed change. The proposed change is acceptable because it assures at least one vacuum relief line will remain available in the event of a single failure. This further assures the ability to actuate upon demand for the purpose of mitigating the consequences of the design basis accident (inadvertent actuation of the containment spray system during normal operation). The remaining vacuum relief line provides sufficient vacuum relief capacity to prevent exceeding the design external pressure loading on containment of 0.65 psi. The resultant calculated peak external pressure loading on containment is 0.49 psi.

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

Therefore, based on the reasoning presented above and the previous discussion of the amendment request, Entergy Operations, Inc. has determined that the requested change does not involve a significant hazards consideration.

ENVIRONMENTAL IMPACT EVALUATION

Pursuant to 10CFR 51.22(b), an evaluation of the proposed amendment has been performed to determine whether or not it meets the criteria for categorical exclusion set forth in 10CFR 51.22 (c) (9) of the regulations. The basis for this determination is as follows:

1. The proposed license amendment does not involve a significant hazards consideration as described previously in the evaluation.
2. This change does not result in a significant change or significant increase in the radiological doses for any design basis accident. The proposed license amendment does not result in a significant change in the types or a significant increase in the amounts of any effluents that may be released off-site.
3. The proposed license amendment does not result in a significant increase to the individual or cumulative occupational radiation exposure because the proposed change does not modify any equipment or alter the way any equipment operates.

MARKUP OF CURRENT TECHNICAL SPECIFICATIONS

CONTAINMENT SYSTEMS

3/4.6.5 VACUUM RELIEF VALVES

LIMITING CONDITION FOR OPERATION

3.6.5 ~~The primary containment to annulus vacuum relief valves shall be OPERABLE with an actuation setpoint of less than or equal to 0.307 psid (8.5 inches H₂O).~~

Two vacuum relief lines shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

With one ~~primary containment to annulus vacuum relief valve~~ ^{line} inoperable, restore the ~~valve~~ to OPERABLE status within 4 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

vacuum relief line

72

SURVEILLANCE REQUIREMENTS

4.6.5 No additional Surveillance Requirements other than those required by Specification 4.0.5.

MARKUP OF CURRENT OPERATING LICENSE

NPF-38

-4-

or indirectly any control over (i) the facility, (ii) power or energy produced by the facility, or (iii) the licensee of the facility. Further, any rights acquired under this authorization may be exercised only in compliance with and subject to the requirements and restrictions of this operating license, the Atomic Energy Act of 1954, as amended, and the NRC's regulations. For purposes of this condition, the limitations of 10 CFR 50.81, as now in effect and as they may be subsequently amended, are fully applicable to the equity investors and any successors in interest to the equity investors, as long as the license for the facility remains in effect.

- (b) Entergy Louisiana, Inc. (or its designee) to notify the NRC in writing prior to any change in (i) the terms or conditions of any lease agreements executed as part of the above authorized financial transactions, (ii) any facility operating agreement involving a licensee that is in effect now or will be in effect in the future, or (iii) the existing property insurance coverages for the facility, that would materially alter the representations and conditions, set forth in the staff's Safety Evaluation enclosed to the NRC letter dated September 18, 1989. In addition, Entergy Louisiana, Inc. or its designee is required to notify the NRC of any action by equity investors or successors in interest to Entergy Louisiana, Inc. that may have an effect on the operation of the facility.

- C. This license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

- 1. Maximum Power Level

EOI is authorized to operate the facility at reactor core power levels not in excess of 3390 megawatts thermal (100% power) in accordance with the conditions specified herein and in Attachment 1 to this license. The items identified in Attachment 1 to this licensee shall be completed as specified. Attachment 1 is hereby incorporated into this license.

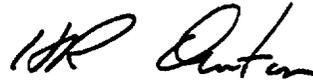
- 2. Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment 169 and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. EOI shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

- 9 -

- H. This license is effective as the date of issuance and shall expire at midnight on December 18, 2024.

FOR THE NUCLEAR REGULATORY COMMISSION



Harold R. Denton, Director
Office of Nuclear Reactor Regulation

Enclosures:

1. Attachment 1 (DELETED)
2. Attachment 2
3. Appendix A (Technical Specifications) (NUREG-1117)
4. Appendix B (Environmental Protection Plan)
5. Appendix C (Antitrust Conditions)

Date of Issuance: March 16, 1985

ATTACHMENT 1

WATERFORD STEAM ELECTRIC STATION
OPERATING LICENSE NPF-38

This attachment identifies items which must be completed to the Commission's satisfaction prior to startup following the refueling outage number 8.

Non-essential Containment Vacuum Relief Sensing Lines:

- Penetration 65 will be modified to reflect a Containment Leak Rate Test connection as indicated in licensee submittal dated August 21, 1996 (Attachment C page 4 of 4).
- Penetration 53 will be modified such that two automatic containment isolation valves will be located outside containment with continuous direct position indication in the control room as indicated in licensee submittal dated August 21, 1996 (Attachment C page 4 of 4).

AMENDMENT NO. 128

MARKUP OF TECHNICAL SPECIFICATION BASES

FOR INFORMATION ONLY

CONTAINMENT SYSTEMS

BASES

3/4.6.4 COMBUSTIBLE GAS CONTROL

The OPERABILITY of the equipment and systems required for the detection and control of hydrogen gas ensures that this equipment will be available to maintain the hydrogen concentration within containment below its flammable limit during post-LOCA conditions. Either recombiner unit is capable of controlling the expected hydrogen generation associated with (1) zirconium-water reactions, (2) radiolytic decomposition of water, and (3) corrosion of metals within containment. These hydrogen control systems are consistent with the recommendations of Regulatory Guide 1.7, "Control of Combustible Gas Concentrations in Containment Following a LOCA," March 1971.

SURVEILLANCE REQUIREMENT SR 4.6.4.2.a requires performance of a system functional test for each hydrogen recombiner to ensure that the recombiners are operational and can attain and sustain the temperature necessary for hydrogen recombination. In particular, this SR requires verification that the minimum heater sheath temperature increases to $\geq 700^{\circ}\text{F}$ in ≤ 90 minutes. After reaching 700°F , the power is increased to maximum for approximately 2 minutes and verified to be ≥ 60 kW.

SURVEILLANCE REQUIREMENT SR 4.6.4.2.b ensures that there are no physical problems that could affect recombiner operation. Since the recombiners are mechanically passive, they are not subject to mechanical failure. The only credible failures involve loss of power, blockage of the internal flow path, missile impact, etc. A visual inspection is sufficient to determine abnormal conditions that could cause such failures.

SURVEILLANCE REQUIREMENT SR 4.6.4.2.c requires performance of a resistance to ground test for each heater phase to ensure that there are no detectable grounds in any heater phase. This is accomplished by verifying that the resistance to ground for any heater phase is $\geq 10,000$ ohms.

3/4.6.5 VACUUM RELIEF VALVES

The OPERABILITY of the primary containment to annulus vacuum relief valves with a setpoint of less than or equal + 0.3 psid ensures that the containment internal pressure differential does not become more negative than the containment design limit for internal pressure differential of 0.65 psi. This situation would occur, for the worst case, if all containment heat removal systems (containment spray, containment cooling, and other HVAC systems) were inadvertently started with only one vacuum relief valve OPERABLE.

Replace with insert

INSERT FOR BASES 3/4.6.5 VACUUM RELIEF VALVES

Page 1 of 2

The vacuum relief valves protect the containment vessel against negative pressure (i.e., a lower pressure inside than outside). Excessive negative pressure inside containment can occur if there is an inadvertent actuation of the Containment Spray System. Multiple equipment failures or human errors are necessary to have inadvertent actuation.

The containment pressure vessel contains two 100% vacuum relief lines installed in parallel that protect the containment from excessive external loading. The vacuum relief lines are 24 inch penetrations that connect the shield building annulus to the containment. Each vacuum relief line is isolated by a pneumatically operated butterfly valve in series with a check valve located on the containment side of the penetration.

Each butterfly valve is actuated by a separate pressure controller that senses the differential pressure between the containment and the annulus. Each butterfly valve is provided with an air accumulator that allows the valve to open following a loss of instrument air.

The combined pressure drop at rated flow through either vacuum relief line will not exceed the containment pressure vessel design external pressure differential of 0.65 psi.

Design of the vacuum relief lines involves calculating the effect of an inadvertent containment spray actuation that can reduce the atmospheric temperature (and hence pressure) inside containment (Ref. FSAR Chapter 6.2). Conservative assumptions are used for pertinent parameters in the analysis. The containment was designed for an external pressure load equivalent to 0.65 psi. The inadvertent actuation of the Containment Spray System was analyzed assuming one of the two vacuum relief lines failed to open. The resulting external pressure load on containment was less than the allowed design load.

The vacuum relief valves must also perform the containment isolation function in a containment high pressure event. For this reason, the system is designed to take the full containment positive design pressure and the containment design basis accident (DBA) environmental conditions (temperature, pressure, humidity, radiation, chemical attack, etc.) associated with the containment DBA.

The vacuum relief valves satisfy Criterion 3 of the 10 CFR 50.36(c)(2)(ii).

INSERT FOR BASES 3/4.6.5 VACUUM RELIEF VALVES

Page 2 of 2

The LCO establishes the minimum equipment required to accomplish the vacuum relief function following the inadvertent actuation of the Containment Spray System. Two vacuum relief lines are required to be OPERABLE to ensure that at least one is available, assuming one or both valves in the other line fail to open.

In MODES 1, 2, 3, and 4, the containment cooling features, such as the Containment Spray System, are required to be OPERABLE to mitigate the effects of a DBA. Excessive negative pressure inside containment could occur whenever these systems are required to be OPERABLE due to inadvertent actuation of these systems. Therefore, the vacuum relief lines are required to be OPERABLE in MODES 1, 2, 3, and 4 to mitigate the effects of inadvertent actuation of the Containment Spray System.

In MODES 5 and 6, the probability and consequences of a DBA are reduced due to the pressure and temperature limitations of these MODES. The Containment Spray System is not required to be OPERABLE in MODES 5 and 6. Therefore, maintaining OPERABLE vacuum relief lines is not required in MODE 5 or 6.

With one of the required vacuum relief lines inoperable, the inoperable line must be restored to OPERABLE status within 72 hours. The specified time period is consistent with other LCOs for the loss of one train of a system required to mitigate the consequences of a LOCA or other DBA.

If the vacuum relief line cannot be restored to OPERABLE status within the required Allowed Outage 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 3 within 6 hours and to MODE 5 within the following 30 hours. The Allowed Outage 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.

The SR references TS 4.0.5 (Inservice Testing Program), which establishes the requirement that inservice testing of the ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda. Therefore, SR Frequency is governed by the Inservice Testing Program.