UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

March 14, 2001

Mr. J. W. Moyer, Vice President
Carolina Power & Light Company
H. B. Robinson Steam Electric Plant,
Unit No. 2
3581 West Entrance Road
Hartsville, South Carolina 29550

SUBJECT: H. B. ROBINSON STEAM ELECTRIC PLANT UNIT 2 - ISSUANCE OF AMENDMENT - TECHNICAL SPECIFICATION CHANGE ON OPERATIONS INVOLVING POSITIVE REACTIVITY ADDITIONS (TAC NO. MA9729)

Dear Mr. Moyer:

The Commission has issued the enclosed Amendment No. 190 to Facility Operating License No. DPR-23 for the H. B. Robinson Steam Electric Plant, Unit No. 2. This amendment consists of changes to the Technical Specifications (TS) in response to your application dated August 10, 2000.

The proposed change would revise Required Actions suspending operations involving reactivity additions and would also revise various Limiting Condition for Operation Notes precluding reduction in boron concentration. These revisions would clarify limits on the introduction of reactivity such that the required SHUTDOWN MARGIN or refueling boron concentration will be satisfied. These changes are consistent with the approved Industry Technical Specification Task Force (TSTF) Technical Specification Change Traveler TSTF-286, Revision 2.

A copy of the Safety Evaluation is enclosed. Notice of Issuance will be included in the Commission's bi-weekly Federal Register notice.

Sincerely,

B P Conrad for

Ram Subbaratnam, Project Manager, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-261

Enclosures:
1. Amendment No. 190 to License No. DPR-23
2. Safety Evaluation

cc w/encls: See next page

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/RA by R. P. Correia for/

Ram Subbaratnam, Project Manager, Section 2
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cc w/encls: See next page
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PM:PDII-S2	LA:PDII-S2	OGC NLC	SC:PD II-S2
RSubbaratnam	EDunnington ETD	RWeisman	RCorreia
3/ /2001	3/9 /2001	3/19 /2001	3/14/2001
Yes/No	Yes/No	Yes/No	Yes/No

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AMENDMENT NO. 190 TO FACILITY OPERATING LICENSE NO. DPR-23 - H. B. Robinson, UNIT 2

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

CAROLINA POWER & LIGHT COMPANY

DOCKET NO. 50-261

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 190
License No. DPR-23

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment filed by Carolina Power & Light Company (CP&L, the licensee), dated August 10, 2000, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications, as indicated in the attachment to this license amendment; and paragraph 2.C.(2) of Facility Operating License No. DPR-23 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 190 , are hereby incorporated in the license. Carolina Power & Light Company shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented within 90 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Richard P. Correia, Chief, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: March 14, 2001

ATTACHMENT TO LICENSE AMENDMENT NO. 190

FACILITY OPERATING LICENSE NO. DPR-23

DOCKET NO. 50-261

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove Pages	Insert Pages
3.3-3 and 3.3-4	3.3-3 and 3.3-4
-----	3.3-4a
3.4-10 and 3.4-11	3.4-10 and 3.4-11
3.4-14 thru 3.4-17	3.4-14 thru 3.4-17
3.4-19 and 3.4-20	3.4-19 and 3.4-20
3.8-14 and 3.8-15	3.8-14 and 3.8-15
3.8-23	3.8-23
3.8-31	3.8-31
3.8-36	3.8-36
3.9-2 and 3.9-3	3.9-2 and 3.9-3
-----	3.9-3a
3.9-6 thru 3.9-8	3.9-6 thru 3.9-8
B 3.3-8 and B 3.3-9	B 3.3-8 and B 3.3-9
B 3.3-26	B 3.3-26
B 3.3-36	B 3.3-36
B 3.3-39 thru B 3.3-49	B 3.3-39 thru B 3.3-49
B 3.4-25 thru B 3.4-29	B 3.4-25 thru B 3.4-29
B 3.4-31 thru B 3.4-34	B 3.4-31 thru B 3.4-34
B 3.4-37 thru B 3.4-39	B 3.4-37 thru B 3.4-39
-----	B 3.4-39a
B 3.4-41 thru B 3.4-43	B 3.4-41 thru B 3.4-43
B 3.8-29 thru B 3.8-31	B 3.8-29 thru B 3.8-31
B 3.8-48 and B 3.8-49	B 3.8-48 and B 3.8-49
B 3.8-63 and B 3.8-64	B 3.8-63 and B 3.8-64
B 3.8-80 and B 3.8-81	B 3.8-80 and B 3.8-81
B 3.9-3 and B 3.9-4	B 3.9-3 and B 3.9-4
B 3.9-6 thru B 3.9-8	B 3.9-6 thru B 3.9-8
B 3.9-14 thru B 3.9-16	B 3.9-14 thru B 3.9-16
B 3.9-19 and B 3.9-20	B 3.9-19 and B 3.9-20

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
E. One channel inoperable.	E.1	Place channel in trip.	6 hours
	OR		
	E.2	Be in MODE 3.	12 hours
F. THERMAL POWER > P-6 and < P-10, one Intermediate Range Neutron Flux channel inoperable.	F.1	Reduce THERMAL POWER to < P-6.	2 hours
	OR		
	F.2	Increase THERMAL POWER to > P-10.	2 hours
G. THERMAL POWER > P-6 and < P-10, two Intermediate Range Neutron Flux channels inoperable.	G.1	--------NOTE--------- Limited boron concentration changes associated with RCS inventory control or limited plant temperature changes are allowed. ----------	
		Suspend operations involving positive reactivity additions.	Immediately
	AND		
	G.2	Reduce THERMAL POWER to < P-6.	2 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
H. THERMAL POWER < P-6, one or two Intermediate Range Neutron Flux channels inoperable.	H.1	Restore channel(s) to OPERABLE status.	Prior to increasing THERMAL POWER to > P-6
I. One Source Range Neutron Flux channel inoperable.	I.1	--------NOTE--------- Limited boron concentration changes associated with RCS inventory control or limited plant temperature changes are allowed. ---------- Suspend operations involving positive reactivity additions.	Immediately
J. Two Source Range Neutron Flux channels inoperable.	J.1	Open RTBs.	Immediately
K. One Source Range Neutron Flux channel inoperable.	K.1	Restore channel to OPERABLE status.	48 hours
	OR		
	K.2	Open RTBs.	49 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
L. Required Source Range Neutron Flux channel(s) inoperable.	----------NOTE---------- Plant temperature changes are allowed provided the temperature change is accounted for in the calculated SDM. ----------		
	L.1	Suspend operations involving positive reactivity additions.	Immediately
	AND		
	L.2	Close unborated water source isolation valves.	1 hour
	AND		
	L.3	Perform SR 3.1.1.1.	1 hour AND Once per 12 hours thereafter

(continued)

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.5 RCS Loops—MODE 3

LCO 3.4.5 Two RCS loops shall be OPERABLE and two RCS loops shall be in operation.

OR

Two RCS loops shall be OPERABLE and one RCS loop shall be in operation provided one of the following requirements is met:

a. The Rod Control System is not capable of rod withdrawal: or

b. The reactor trip breakers are open; or

c. The lift disconnect switches for all control rods not fully withdrawn are open; or

d. SHUTDOWN MARGIN (SDM) is within the MODE 3 limits for one RCS loop in operation as specified in the COLR.

----------NOTE----------

All reactor coolant pumps may be de-energized for ≤ 1 hour in any 8 hour period provided:

a. No operations are permitted that would cause introduction into the RCS, coolant with boron concentration less than required to meet the SDM of LCO 3.1.1;

b. Core outlet temperature is maintained at least 10°F below saturation temperature; and

1. Rod Control System is not capable of rod withdrawal,

OR

2. Reactor Trip Breakers are open,

OR

3. Lift disconnect switches for all control rods not fully withdrawn are open,

OR

4. SDM is within MODE 3 limits for no RCS loops in operation as specified in the COLR.

APPLICABILITY: MODE 3.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One required RCS loop inoperable.	A.1	Restore required RCS loop to OPERABLE status.	72 hours
B. Required Action and associated Completion Time of Condition A not met.	B.1	Be in MODE 4.	12 hours
C. Requirements of the LCO not met for reasons other than Condition A or D.	C.1	Satisfy the conditions of the LCO.	1 hour
D. Required Action C.1 and associated Completion Time not Met.	D.1	De-energize all CRDMs.	Immediately
	AND		
OR	D.2	Suspend operations that would cause introduction into the RCS, coolant with boron concentration less than required to meet SDM of LCO 3.1.1.	Immediately
Two required RCS loops inoperable.			
OR			
	AND		
No RCS loop in operation.	D.3	Initiate action to restore one RCS loop to OPERABLE status and operation.	Immediately

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.6 RCS Loops—MODE 4

LCO 3.4.6 Two loops or trains consisting of any combination of RCS loops and residual heat removal (RHR) trains shall be OPERABLE, and one loop or train shall be in operation.

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

1. All reactor coolant pumps (RCPs) and RHR pumps may be de-energized for ≤ 1 hour in any 8 hour period provided:

   a. No operations are permitted that would cause introduction into the RCS, coolant with boron concentration less than required to meet the SDM of LCO 3.1.1;

   b. Core outlet temperature is maintained at least 10°F below saturation temperature; and

   c. Rod Control System is not capable of rod withdrawal.

2. No RCP shall be started unless there is a steam bubble in the pressurizer or the secondary side water temperature of each steam generator (SG) is ≤ 50°F above each of the RCS cold leg temperatures.

APPLICABILITY: MODE 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One required loop or train inoperable. AND One required RCS loop OPERABLE.	A.1 Initiate action to restore a second loop or train to OPERABLE status.	Immediately

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. One required loop or train inoperable. AND One required RHR train OPERABLE.	B.1 Be in MODE 5.	24 hours
C. Two required loops or trains inoperable. OR Required loop or train not in operation.	C.1 Suspend operations that would cause introduction into the RCS, coolant with boron concentration less than required to meet SDM of LCO 3.1.1. AND C.2 Initiate action to restore one loop or train to OPERABLE status and operation.	Immediately Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.4.6.1	Verify one RHR train or RCS loop is in operation.	12 hours
SR 3.4.6.2	Verify SG secondary side water levels are ≥ 16% for required RCS loops.	12 hours
SR 3.4.6.3	Verify correct breaker alignment and indicated power are available to the required pump that is not in operation.	7 days

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.7 RCS Loops—MODE 5, Loops Filled

LCO 3.4.7 One residual heat removal (RHR) train shall be OPERABLE and in operation, and either:

a. One additional RHR train shall be OPERABLE; or

b. One OPERABLE steam generator (SG) with a secondary side water level of ≥ 16%.

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

1. The RHR pump of the train in operation may be de-energized for ≤ 1 hour in any 8 hour period provided:

   a. No operations are permitted that would cause introduction into the RCS, coolant with boron concentration less than required to meet the SDM of LCO 3.1.1; and

   b. Core outlet temperature is maintained at least 10°F below saturation temperature.

2. One required RHR train may be inoperable and de-energized for up to 2 hours for surveillance testing provided that the other RHR train is OPERABLE.

3. No reactor coolant pump shall be started unless there is a steam bubble in the pressurizer or the secondary side water temperature of each SG is ≤ 50°F above each of the RCS cold leg temperatures.

4. All RHR trains may be removed from operation during planned heatup to MODE 4 when at least one RCS loop is in operation.

APPLICABILITY: MODE 5 with RCS loops filled.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One RHR train inoperable. AND Required SG secondary side water level not within limits.	A.1	Initiate action to restore a second RHR train to OPERABLE status.	Immediately
	OR		
	A.2	Initiate action to restore required SG secondary side water level to within limits.	Immediately
B. Required RHR trains inoperable. OR No RHR train in operation.	B.1	Suspend operations that would cause introduction into the RCS, coolant with boron concentration less than required to meet SDM of LCO 3.1.1.	Immediately
	AND		
	B.2	Initiate action to restore one RHR train to OPERABLE status and operation.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.4.7.1	Verify one RHR train is in operation.	12 hours
SR 3.4.7.2	Verify SG secondary side water level is ≥ 16% in required SG.	12 hours

(continued)

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.8 RCS Loops—MODE 5, Loops Not Filled

LCO 3.4.8 Two residual heat removal (RHR) trains shall be OPERABLE and one RHR train shall be in operation.

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

1. All RHR pumps may be de-energized for ≤ 15 minutes when switching from one train to another or to perform testing of the RHR loop supply valves provided:

   a. The core outlet temperature is maintained > 10°F below saturation temperature,

   b. No operations are permitted that would cause introduction into the RCS, coolant with boron concentration less than required to meet the SDM of LCO 3.1.1; and

   c. No draining operations to further reduce the RCS water volume are permitted.

2. One RHR train may be inoperable for ≤ 2 hours for surveillance testing provided that the other RHR train is OPERABLE.

APPLICABILITY: MODE 5 with RCS loops not filled.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One RHR train inoperable.	A.1	Initiate action to restore RHR train to OPERABLE status.	Immediately

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. Required RHR trains inoperable. OR No RHR train in operation.	B.1 Suspend operations that would cause introduction into the RCS, coolant with boron concentration less than required to meet SDM of LCO 3.1.1.	Immediately
	AND	
	B.2 Initiate action to restore one RHR train to OPERABLE status and operation.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.4.8.1	Verify one RHR train is in operation.	12 hours
SR 3.4.8.2	Verify correct breaker alignment and indicated power are available to the required RHR pump that is not in operation.	7 days

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.2.1 Suspend CORE ALTERATIONS.	Immediately
	AND	
	A.2.2 Suspend movement of irradiated fuel assemblies.	Immediately
	AND	
	A.2.3 Suspend operations involving positive reactivity additions that could result in loss of required SDM or boron concentration.	Immediately
	AND	
	A.2.4 Initiate action to restore required offsite power circuit to OPERABLE status.	Immediately
B. The required DG inoperable.	B.1 Suspend CORE ALTERATIONS.	Immediately
	AND	
	B.2 Suspend movement of irradiated fuel assemblies.	Immediately
	AND	(continued)

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
B. (continued)	B.3	Suspend operations involving positive reactivity additions that could result in loss of required SDM or boron concentration.	Immediately
	AND		
	B.4	Initiate action to restore required DG to OPERABLE status.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.8.2.1	----------NOTE---------- The following SRs are not required to be performed: SR 3.8.1.3, SR 3.8.1.8, SR 3.8.1.9, SR 3.8.1.11 through SR 3.8.1.15. ---------- For AC sources required to be OPERABLE, the SRs of Specification 3.8.1, "AC Sources—Operating," except SR 3.8.1.16, and SR 3.8.1.17, are applicable.	In accordance with applicable SRs

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.2.3 Suspend operations involving positive reactivity additions that could result in loss of required SDM or boron concentration. AND	Immediately
	A.2.4 Initiate action to restore required DC electrical power subsystems to OPERABLE status.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.8.5.1	----------NOTE---------- The following SRs are not required to be performed: SR 3.8.4.4, SR 3.8.4.5, and SR 3.8.4.6. ---------- For DC sources required to be OPERABLE, the following SRs are applicable: SR 3.8.4.1 SR 3.8.4.3 SR 3.8.4.5 SR 3.8.4.2 SR 3.8.4.4 SR 3.8.4.6	In accordance with applicable SRs

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.2.3 Suspend operations involving positive reactivity additions that could result in loss of required SDM or boron concentration. AND	Immediately
	A.2.4 Initiate action to restore AC instrument bus sources to OPERABLE status.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.8.8.1	----------NOTE---------- Actual voltage and frequency measurement is not required for AC instrument buses supplied from CVTs. ---------- Verify correct inverter voltage, frequency, and alignments to required AC instrument buses.	7 days

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.2.3 Suspend operations involving positive reactivity additions that could result in loss of required SDM or boron concentration.	Immediately
	AND	
	A.2.4 Initiate actions to restore required AC, DC, and AC instrument bus electrical power distribution subsystems to OPERABLE status.	Immediately
	AND	
	A.2.5 Declare associated required residual heat removal subsystem(s) inoperable and not in operation.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.8.10.1	----------NOTE---------- Actual voltage measurement is not required for the AC vital buses supplied from constant voltage transformers. ----------	
	Verify correct breaker alignments and voltage to required AC, DC, and AC instrument bus electrical power distribution subsystems.	7 days

3.9 REFUELING OPERATIONS

3.9.2 Nuclear Instrumentation

LCO 3.9.2 Two source range neutron flux monitors shall be OPERABLE.

APPLICABILITY: MODE 6.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One required source range neutron flux monitor inoperable	A.1	Verify one Post Accident Monitor (PAM) source range neutron flux monitor provides indication in the Control Room.	15 minutes
	AND		
	A.2	Log indicated PAM source range neutron monitor count rate.	30 minutes AND Once per 30 minutes thereafter

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
B. Required Actions and Completion Times of Condition A not met.	B.1	Suspend CORE ALTERATIONS.	Immediately
	AND		
	B.2	Suspend operations that would cause introduction into the RCS, coolant with boron concentration less than required to meet boron concentration of LCO 3.9.1.	Immediately
C. Two required source range neutron flux monitors inoperable.	C.1	Initiate action to restore one source range neutron flux monitor to OPERABLE status.	Immediately
	AND		
	C.2	Suspend CORE ALTERATIONS.	Immediately
	AND		
	C.3	Suspend positive reactivity additions.	Immediately
	AND		
	C.4	Perform SR 3.9.1.1.	4 hours AND Once per 12 hours thereafter

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.9.2.1	Perform CHANNEL CHECK.	12 hours
SR 3.9.2.2	----------NOTE---------- Neutron detectors are excluded from CHANNEL CALIBRATION. ---------- Perform CHANNEL CALIBRATION.	18 months

3.9 REFUELING OPERATIONS

3.9.4 Residual Heat Removal (RHR) and Coolant Circulation—High Water Level

LCO 3.9.4 One RHR train shall be OPERABLE and in operation.

----------NOTE----------
The required RHR train may be removed from operation for ≤ 1 hour in any 8 hour period, provided no operations are permitted that would cause introduction into the Reactor Coolant System, coolant with boron concentration less than that required to meet the minimum required boron concentration of LCO 3.9.1.

APPLICABILITY: MODE 6 with the water level ≥ 23 ft above the top of reactor vessel flange.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. RHR train requirements not met.	A.1	Suspend operations that would cause introduction into the RCS, coolant with boron concentration less than required to meet boron concentration of LCO 3.9.1.	Immediately
	AND		
	A.2	Suspend loading irradiated fuel assemblies in the core.	Immediately
	AND		
			(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.3 Initiate action to satisfy RHR train requirements.	Immediately
	AND	
	A.4 Close all containment penetrations providing direct access from containment atmosphere to outside atmosphere.	4 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.9.4.1 Verify one RHR train is in operation.	12 hours

3.9 REFUELING OPERATIONS

3.9.5 Residual Heat Removal (RHR) and Coolant Circulation—Low Water Level

LCO 3.9.5 Two RHR trains shall be OPERABLE, and one RHR train shall be in operation.

APPLICABILITY: MODE 6 with the water level < 23 ft above the top of reactor vessel flange.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. Less than the required number of RHR trains OPERABLE.	A.1	Initiate action to restore required RHR trains to OPERABLE status.	Immediately
	OR		
	A.2	Initiate action to establish ≥ 23 ft of water above the top of reactor vessel flange.	Immediately
B. No RHR train in operation.	B.1	Suspend operations that would cause introduction into the RCS, coolant with boron concentration less than required to meet boron concentration of LCO 3.9.1.	Immediately
	AND		
			(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

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 RPS or Engineered Safety Features Actuation System (ESFAS) 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 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 the shutdown rods or control rods are withdrawn since withdrawn rods are required to insert to satisfy SDM requirements in those MODES. With the Control Rod Drive (CRD) System capable of withdrawing the shutdown rods or the control rods in MODE 3, 4, or 5, inadvertent control rod withdrawal is possible. Therefore, manual reactor trip is also required in this condition. In MODE 3, 4, or 5, manual initiation of a reactor trip does not have to be OPERABLE if the RTBs are open. If the RTBs are open, there is no need to be able to trip the reactor because all of the rods are inserted. This requirement maintains maximum shutdown margin available in the event of a reactivity excursion while in MODES 3, 4, or 5. In MODE 6, neither the shutdown rods nor the control rods are

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

1. Manual Reactor Trip (continued)

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 the Turbine Control System. Therefore, the actuation logic must be able to withstand an input failure to the control system, which may then require the protection function actuation, and a single failure in the other channels providing the protection function actuation. Note that this Function also provides a signal to prevent automatic and manual rod withdrawal prior to initiating a reactor trip. Limiting further rod withdrawal may terminate the transient and eliminate the need to trip the reactor.

a. Power Range Neutron Flux-High

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

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

In MODE 1 or 2, when a positive reactivity excursion could occur, the Power Range Neutron Flux-High trip must be OPERABLE. This Function will terminate the reactivity excursion and shut down the reactor prior to reaching a power level that could damage the fuel. In MODE 3, 4, 5, or 6, the NIS power range 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

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

b. Turbine Trip–Turbine Stop Valve Closure

The Turbine Trip–Turbine Stop Valve Closure trip Function anticipates the loss of heat removal capabilities of the secondary system following a turbine trip from a power level above the P-7 setpoint, approximately 10% power. This action will actuate a reactor trip. The trip Function anticipates the loss of secondary heat removal capability that occurs when the stop valves close. Tripping the reactor in anticipation of loss of secondary heat removal acts to minimize the pressure and temperature transient on the reactor. This trip Function will not and is not required to operate in the presence of a single channel failure. The unit is designed to withstand a complete loss of load and not sustain core damage or challenge the RCS pressure limitations. Core protection is provided by the Pressurizer Pressure–High trip Function, and RCS integrity is ensured by the pressurizer safety valves. This trip Function is diverse to the Turbine Trip–Low Auto-Stop Oil Pressure trip Function. Each turbine stop valve is equipped with one limit switch that inputs to the RPS. If both limit switches indicate that the stop valves are closed, a reactor trip is initiated.

The limit switches are set to assure channel trip occurs when the associated stop valve is closed.

The LCO requires two Turbine Trip–Turbine Stop Valve Closure channels, one per valve, to be OPERABLE in MODE 1 above P-7. Both channels must trip to cause reactor trip.

Below the P-7 setpoint, a load rejection can be accommodated by the Steam Dump System. In MODE 3, 4, 5, or 6, there is no potential for a load rejection, and the Turbine Trip–Stop Valve Closure trip Function does not need to be OPERABLE.

(continued)

BASES

ACTIONS

C.1 and C.2 (continued)

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, the RTBs must be opened within the next hour. The additional hour provides sufficient time to accomplish the action in an orderly manner. With the RTBs open, these Functions are no longer required.

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

D.1.1, D.1.2, D.2.1, D.2.2, and D.3

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

The NIS power range detectors provide 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).

In addition to placing the inoperable channel in the tripped condition, THERMAL POWER must be reduced to ≤ 75% RTP within 12 hours. Reducing the power level prevents operation of the core with radial power distributions beyond the design limits. With one of the NIS power range detectors inoperable, 1/4 of the radial power distribution monitoring capability is lost.

As an alternative to the above actions, the inoperable channel can be placed in the tripped condition within 6 hours and the QPTR monitored once every 12 hours as per SR 3.2.4.2, QPTR verification. Calculating QPTR every 12 hours compensates for the lost monitoring capability due to the inoperable NIS power range channel and allows continued unit operation at power levels ≥ 75% RTP. The

(continued)

BASES

ACTIONS (continued)

G.1 and G.2

Condition G applies to two inoperable Intermediate Range Neutron Flux trip channels 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, the Source Range Neutron Flux channels will be able to monitor the core power level. The Completion Time of 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.

Required Action G.1 is modified by a note to indicate that normal plant control operations that individually add limited positive reactivity (i.e., temperature or boron concentration fluctuations associated with RCS inventory management or temperature control) are not precluded by this Action, provided SDM requirements in MODEs 1 and 2 with $K_{eff} \geq 1.0$ are maintained by observance of LCOs 3.1.4, 3.1.5, and 3.4.2.

H.1

Condition H applies to the Intermediate Range Neutron Flux trip when THERMAL POWER is below the P-6 setpoint and one or two channels are inoperable. Below the P-6 setpoint, the NIS source range performs the monitoring and protection functions. The inoperable NIS intermediate range channel(s) must be returned to OPERABLE status prior to increasing power above the P-6 setpoint. The NIS intermediate range channels must be OPERABLE when the power level is above the capability of the source range, P-6, and below the capability of the power range, P-10.

(continued)

BASES

ACTIONS (continued)

I.1

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

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

Required Action I.1 is modified by a note to indicate that normal plant control operations that individually add limited positive reactivity (i.e., temperature or boron concentration fluctuations associated with RCS inventory management or temperature control) are not precluded by this Action, provided SDM requirements in MODEs 1 and 2 with $K_{eff} \geq 1.0$ are maintained by observance of LCOs 3.1.4, 3.1.5, and 3.4.2.

J.1

Condition J applies to two inoperable Source Range Neutron Flux trip channels when in MODE 2, below the P-6 setpoint, or in MODE 3, 4, or 5 with the RTBs closed. With the unit in this Condition, below P-6, the NIS source range performs the monitoring and protection functions. With both source range channels inoperable, the RTBs must be opened immediately. With the RTBs open, the core is in a more stable condition and the unit enters Condition L.

K.1 and K.2

Condition K applies to one inoperable source range channel in MODE 3, 4, or 5 with the RTBs closed. With the unit in this Condition, below P-6, the NIS source range performs the monitoring and protection functions. With one of the source range channels inoperable, 48 hours is allowed to restore it to an OPERABLE status. If the channel cannot be returned to an OPERABLE status, 1 additional hour is allowed to open the RTBs. Once the RTBs are open, the core is in a more stable condition and the unit enters

(continued)

BASES

ACTIONS

K.1 and K.2 (continued)

Condition L. The allowance of 48 hours to restore the channel to OPERABLE status, and the additional hour to open the RTBs, are justified in Reference 8.

L.1, L.2, and L.3

Condition L applies when the required number of OPERABLE Source Range Neutron Flux channels is not met in MODE 3, 4, or 5 with the RTBs open. With the unit in this Condition, the NIS source range performs the monitoring and protection functions. With less than the required number of source range channels OPERABLE, operations involving positive reactivity additions shall be suspended immediately. In addition to suspension of positive reactivity additions, all valves that could add unborated water to the RCS must be closed within 1 hour as specified in LCO 3.9.2. The isolation of unborated water sources will preclude a boron dilution accident.

Also, the SDM must be verified within 1 hour and once every 12 hours thereafter as per SR 3.1.1.1, SDM verification. With no source range channels OPERABLE, core protection is severely reduced. Verifying the SDM within 1 hour allows sufficient time to perform the calculations and determine that the SDM requirements are met. The SDM must also be verified once per 12 hours thereafter to ensure that the core reactivity has not changed. Required Action L.1 precludes any positive reactivity additions; therefore, core reactivity should not be increasing, and a 12 hour Frequency is adequate. The Completion Times of within 1 hour and once per 12 hours are based on operating experience in performing the Required Actions and the knowledge that unit conditions will change slowly.

Required Action L.1 is modified by a note that permits plant temperature changes provided the temperature change is accounted for in the calculated SDM. Introduction of temperature changes, including temperature increases when a positive MTC exists, must be evaluated to ensure they do not result in a loss of required SDM.

(continued)

BASES

ACTIONS (continued)

M.1 and M.2

Condition M applies to the following reactor trip Functions:

- Pressurizer Pressure – Low;
- Pressurizer Water Level – High;
- Reactor Coolant Flow – Low (Two Loops);
- 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 and below the P-8 setpoint. 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.

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 M.

N.1 and N.2

Condition N applies to the Reactor Coolant Flow–Low (Single Loop) reactor trip Function. With one channel inoperable, the inoperable channel must be placed in trip within 6 hours. If the channel cannot be restored to OPERABLE status or the channel placed in trip 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

(continued)

BASES

ACTIONS

N.1 and N.2 (continued)

a MODE where the LCO is no longer applicable. This trip Function does not have to be OPERABLE below the P-8 setpoint because other RPS trip Functions provide core protection below the P-8 setpoint. The 6 hours allowed to restore the channel to OPERABLE status or place in trip and the 4 additional hours allowed to reduce THERMAL POWER to below the P-8 setpoint are justified in Reference 7.

O.1 and O.2

Condition O 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 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.

P.1 and P.2

Condition P applies to Turbine Trip on Low Auto-Stop Oil Pressure or on Turbine Stop Valve Closure. With one channel inoperable, the inoperable channel must be placed in the trip condition within 6 hours. If placed in the tripped condition, this results in a partial trip condition requiring only one additional channel to initiate a reactor trip. If the channel cannot be restored to OPERABLE status or placed in the trip condition, then power must be reduced below the P-7 setpoint within the next 4 hours. The 6 hours allowed to place the inoperable channel in the tripped condition and the 4 hours allowed for reducing power are justified in Reference 7.

(continued)

BASES

ACTIONS (continued)

Q.1 and Q.2

Condition Q 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 Q.1) or the unit must be placed in MODE 3 within the next 6 hours. The Completion Time of 6 hours (Required Action Q.1) is reasonable considering that in this Condition, the remaining OPERABLE train is adequate to perform the safety function and given the low probability of an event during this interval. The Completion Time of 6 hours (Required Action Q.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 12 hours for maintenance or surveillance testing, provided the other train is OPERABLE.

R.1 and R.2

Condition R 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 removes the requirement for this particular Function.

The Required Actions have been modified by a Note which allows one channel to be bypassed for up to 12 hours for maintenance or surveillance testing, provided the other channel is OPERABLE.

(continued)

BASES

ACTIONS (continued)

S.1 and S.2

Condition S applies to the P-6 and P-10 interlocks. With one channel 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.

T.1 and T.2

Condition T applies to the P-7, P-8, and Turbine Impulse Pressure inputs. With one channel 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.

U.1, U.2.1, and U.2.2

Condition U 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)

(continued)

BASES

ACTIONS

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

followed by opening the RTBs in 1 additional hour (55 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 RTBs open and the unit in MODE 3, this trip Function is no longer required to be OPERABLE. The affected RTB should 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 or surveillance testing the diverse features is 12 hours for the reasons stated under Condition R.

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

V.1

With two RPS trains inoperable, no automatic capability is available to shut down the reactor, and immediate plant shutdown in accordance with LCO 3.0.3 is required.

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

(continued)

BASES

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 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.

Deviation 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 3.3.1.2

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 that 12

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.1.2 (continued)

hours are 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 and overpower ΔT Functions.

Two Notes modify SR 3.3.1.3. Note 1 indicates that the excore NIS channel shall be adjusted if the absolute difference between the incore and excore AFD is ≥ 3%. Note 2 clarifies that the Surveillance is required only if reactor power is $ 15% RTP and that 36 hours is allowed for performing the first Surveillance after reaching 15% RTP.

The Frequency of every 31 EFPD is adequate. It is based on industry 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.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

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 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 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. 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.

A note is added to SR 3.3.1.5 stating that the SR is not required to be performed for the source range neutron flux detector channels prior to entry into MODE 3 from MODE 2 until 4 hours after entry into MODE 3. This Note allows normal shutdown to proceed without delay for testing in MODE 2 and in MODE 3 until the RTBs are open and SR 3.3.1.5 is no longer required to be performed (i.e., the 4 hour delay allows a normal shutdown to be completed without a required hold on power reduction to perform the testing required by this SR). If the unit is in MODE 3 with the RTBs closed for greater than 4 hours, this SR must be performed prior to 4 hours after entry into MODE 3.

(continued)

BASES (continued)

LCO (continued)

tests that are designed to validate various accident analyses values. One of these tests is validation of the pump coastdown curve used as input to a number of accident analyses including a loss of flow accident. This test is generally performed in MODE 3 during the initial startup testing program, and as such should only be performed once. If, however, changes are made to the RCS that would cause a change to the flow characteristics of the RCS, the input conducting the test again. Another test performed during the startup testing program is the validation of rod drop times during cold conditions, both with and without flow.

The no flow test may be performed in MODE 3, 4, or 5 and requires that the pumps be stopped for a short period of time. The Note permits the de-energizing of the pumps in order to perform this test and validate the assumed analysis values. As with the validation of the pump coastdown curve, this test should be performed only once unless the flow characteristics of the RCS are changed. The 1 hour time period specified is adequate to perform the desired tests, and 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 initial startup test procedures:

a. No operations are permitted that would dilute the RCS boron concentration with coolant at boron concentrations less than required to assure the SDM of LCO 3.1.1, thereby maintaining the margin to criticality. Boron reduction with coolant at boron concentrations less than required to assure the SDM is maintained 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.

c. The Rod Control System is not capable of rod withdrawal, the reactor trip breakers are open, or the lift disconnect switches for all control rods not fully withdrawn are open. Any of these conditions

(continued)

BASES (continued)

LCO (continued)

will prevent the occurrence of an inadvertent control rod withdrawal transient. An alternate condition, described in item c.4 of the Note, is to maintain SDM within the MODE 3 limit for no RCS loops in operation as specified in the COLR. This SDM limit is sufficient to prevent a return to criticality in the event of simultaneous withdrawal of the two most reactive control rod banks as assumed in the inadvertent control rod transient analysis.

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 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).

(continued)

BASES (continued)

ACTIONS

A.1

If one required RCS loop is inoperable, redundancy for 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.

C.1

With the requirements of the LCO not met for reasons other than Conditions A or D (i.e., one of the two required RCS loops not in operation and the requirements of LCO 3.4.5 item a, b, c, or d not met), an additional RCS loop must be restored to operation within 1 hour. Should a power excursion occur due to an inadvertent control rod withdrawal transient with one of the two required RCS loops not in operation and the requirements of LCO 3.4.5 item a, b, c, or d not satisfied, the accident analysis limits may be exceeded. Therefore, only a limited time is allowed to restore an additional RCS loop to operation. Alternatively, if the requirements of the LCO 3.4.5 item a, b, c, or d are met, operation with only one RCS loop in operation would satisfy the requirements of the LCO and ensure that the possibility of a power excursion associated with an inadvertent control rod withdrawal transient is precluded. The 1 hour Completion Time is adequate to perform these operations in an orderly manner without exposing the unit to risk for an undue period of time.

(continued)

BASES

ACTIONS (continued)

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

With Required Action C.1 and associated Completion Time not met, two required RCS loops inoperable, or no RCS loops in operation (except during the 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 introduction of coolant into the RCS with boron concentration less than required to meet the minimum SDM of LCO 3.1.1 must be suspended, and action to restore one of the RCS loops to OPERABLE status and operation must be initiated. A planned reduction in RCS boron concentration requires forced circulation for proper mixing, and opening the RTBs or de-energizing the MG sets removes the possibility of an inadvertant rod withdrawal. Suspending the introduction of coolant into the RCS of coolant with boron concentration less than required to meet the minimum SDM of LCO 3.1.1 is required to assure continued safe operation. With coolant added without forced circulation, unmixed coolant could be introduced to the core, however, coolant added with boron concentration meeting the minimum SDM maintains acceptable margin to subcritical operations. The immediate Completion Time reflects the importance of maintaining operation for heat removal. The action to restore must be continued until one loop is restored to OPERABLE status and operation.

SURVEILLANCE REQUIREMENTS

SR 3.4.5.1

This SR requires verification every 12 hours that the required loops are 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 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 secondary side narrow range water level is ≥ 16% for required RCS loops. If the SG secondary side narrow range water level is < 16%, the tubes may become uncovered and the associated loop may

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.4.5.2 (continued)

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, SR 3.4.5.4, SR 3.4.5.5, and SR 3.4.5.6

Periodic verification of the alternate administrative controls established by LCO 3.4.5 items a, b, c, or d, is prudent to preclude the possibility of a power excursion associated with an inadvertent control rod withdrawal when only one RCS loop is in operation. The 12 hour Frequency for SR 3.4.5.3, SR 3.4.5.4, and SR 3.4.5.5 is acceptable since the status of the affected components is not likely to change without the operator being aware of it. The 24 hour Frequency for SR 3.4.5.6 is based on the generally slow change in the required boron concentration and the low probability of an accident occurring without the required SDM.

SR 3.4.5.3, SR 3.4.5.4, SR 3.4.5.5 and SR 3.4.5.6 have been modified by Notes, which clarify that these SRs are not required to be met if the alternate requirements of SR 3.4.5.3, SR 3.4.5.4, SR 3.4.5.5, SR 3.4.5.6, as applicable, are satisfied.

SR 3.4.5.7

Verification that the required RCPs are OPERABLE ensures that safety analyses limits are met. The requirement also 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 None.

BASES

LCO (continued)

loops or trains that are required to be OPERABLE to consist of any combination of RCS loops and RHR trains. Any one loop or train in operation provides enough flow to remove the decay heat from the core with forced circulation. An additional loop or train is required to be OPERABLE to provide redundancy for heat removal.

Note 1 permits all RCPs or RHR pumps to be de-energized for ≤ 1 hour in any 8 hour period. The purpose of the Note is to permit tests that are designed to validate various accident analyses values. One of the tests performed during the startup testing program is the validation of rod drop times during cold conditions, both with and without flow. The no flow test may be performed in MODE 3, 4, or 5 and requires that the pumps be stopped for a short period of time. The Note permits the de-energizing of the pumps in order to perform this test and validate the assumed analysis values. If changes are made to the RCS that would cause a change to the flow characteristics of the RCS, the input values must be revalidated by conducting the test again. The 1 hour time period is adequate to perform the test, and operating experience has shown that boron stratification is not a problem 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 initial startup test procedures:

a. No operations are permitted that would dilute the RCS boron concentration with coolant at boron concentrations less than required to assure the SDM of LCO 3.1.1, therefore maintaining the margin to criticality. Boron reduction with coolant at boron concentrations less than required to assure the SDM is maintained 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.

c. The Rod Control System is not capable of rod withdrawal, due to the postulation of a power excursion because of an inadvertent control rod withdrawal.

(continued)

BASES

LCO (continued)

Note 2 requires that there be a steam bubble in the pressurizer or the secondary side water temperature of each SG be ≤ 50°F above each of the RCS cold leg temperatures before the start of an RCP. 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 train 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 or train of either RCS or RHR provides sufficient circulation for these purposes. However, two circuits consisting of any combination of RCS loops and RHR trains are required to be OPERABLE to meet single failure considerations.

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 or RHR train is inoperable and only one required RCS loop remains OPERABLE, the intended redundancy for heat removal is lost. Action must be initiated to restore a second RCS loop or RHR train to

(continued)

BASES

ACTIONS

A.1 (continued)

OPERABLE status. The immediate Completion Time reflects the importance of maintaining the availability of two paths for heat removal.

B.1

If one required RCS loop or RHR train is inoperable and only one required RHR train is OPERABLE and in operation, an inoperable RCS loop or RHR train 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 train OPERABLE, redundancy for decay heat removal is lost and, in the event of a loss of the remaining RHR train, it would be safer to initiate that loss from MODE 5 (≤ 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.

C.1 and C.2

If no loop or train is OPERABLE or in operation, except during conditions permitted by Note 1 in the LCO section, all operations involving introduction of coolant into the RCS with boron concentration less than required to meet the minimum SDM of LCO 3.1.1 must be suspended and action to restore one RCS loop or RHR train to OPERABLE status and operation must be initiated. A planned reduction in boron concentration requires forced circulation to provide proper mixing, and preserve the margin to criticality. Suspending the introduction of coolant into the RCS of coolant with boron concentration less than required to meet the minimum SDM of LCO 3.1.1 is required to assure continued safe operation. With coolant added without forced circulation, unmixed coolant could be introduced to the core, however, coolant added with boron concentration meeting the minimum SDM maintains acceptable margin to subcritical operations. The immediate Completion Times reflect the importance of

(continued)

BASES (continued)

ACTIONS

C.1 and C.2 (continued)

maintaining operation for decay heat removal. The action to restore must be continued until one loop or train is restored to OPERABLE status and operation.

SURVEILLANCE REQUIREMENTS

SR 3.4.6.1

This SR requires verification every 12 hours that one RCS loop or RHR train 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 loop and RHR train performance.

SR 3.4.6.2

SR 3.4.6.2 requires verification of SG OPERABILITY. SG OPERABILITY is verified by ensuring that the secondary side narrow range water level is ≥ 16%. If the SG secondary side narrow range water level is < 16%, the tubes may become uncovered and the associated loop may not be capable of providing the heat sink necessary for removal of decay heat. 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. 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.

BASES

LCO (continued)

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 initial startup test procedures:

a. No operations are permitted that would dilute the RCS boron concentration with coolant at boron concentrations less than required to assure the SDM of LCO 3.1.1, therefore maintaining the margin to criticality. Boron reduction with coolant at boron concentrations less than required to assure the SDM is maintained 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 train to be inoperable and de-energized for a period of up to 2 hours, provided that the other RHR train is OPERABLE. This permits periodic surveillance tests to be performed on the inoperable train during the only time when such testing is safe and possible.

Note 3 requires that there be a steam bubble in the pressurizer or the secondary side water temperature of each SG be ≤ 50°F above each of the RCS cold leg temperatures before the start of a reactor coolant pump (RCP). 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 trains 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 trains.

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 when it has an adequate water level, the RCS is not vented, and is OPERABLE in accordance with the Steam Generator Tube Surveillance Program.

(continued)

BASES (continued)

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 train of RHR provides sufficient circulation for these purposes. However, one additional RHR train is required to be OPERABLE, or the secondary side water level of at least one SG is required to be ≥ 16% with the RCS not vented.

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 train is inoperable and the required SG has secondary side water level < 16% or the RCS is vented, redundancy for heat removal is lost. Action must be initiated immediately to restore a second RHR train to OPERABLE status or to restore the required SG secondary side water level and the RCS pressure boundary. 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 train is in operation, except during conditions permitted by Note 1, or if no train is OPERABLE, all operations involving introduction of coolant into the RCS with boron concentration less than required to meet the minimum SDM of LCO 3.1.1 must be suspended and action to restore one RHR train to OPERABLE status and operation must be initiated. Suspending the introduction of coolant into

(continued)

BASES

ACTIONS

B.1 and B.2

the RCS of coolant with boron concentration less than required to meet the minimum SDM of LCO 3.1.1 is required to assure continued safe operation. With coolant added without forced circulation, unmixed coolant could be introduced to the core, however, coolant added with boron concentration meeting the minimum SDM maintains acceptable margin to subcritical operations. The immediate Completion Times reflect the importance of maintaining operation for heat removal.

SURVEILLANCE REQUIREMENTS

SR 3.4.7.1

This SR requires verification every 12 hours that the required train 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 train performance.

SR 3.4.7.2

Verifying that at least one SG is OPERABLE by ensuring its secondary side narrow range water level is ≥ 16% and the RCS is not vented ensures an alternate decay heat removal method in the event that the second RHR train is not OPERABLE. If both RHR trains 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 or the RCS pressure boundary.

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

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.4.7.3 (continued)

side water level is ≥ 16% in at least one SG and the RCS is not vented, 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.

REFERENCES

1. NRC Information Notice 95-35, "Degraded Ability of Steam Generators to Remove Decay Heat by Natural Circulation," August 28, 1995.

BASES

LCO (continued)

Note 1 permits all RHR pumps to be de-energized for ≤ 15 minutes when switching from one train to another. The circumstances for stopping both RHR pumps are to be limited to situations when the outage time is short and core outlet temperature is maintained > 10°F below saturation temperature. The Note prohibits boron dilution with coolant at boron concentrations less than required to assure the SDM of LCO 3.1.1 is maintained or draining operations when RHR forced flow is stopped. Testing of the RHR loop supply valves can not be performed without de-energizing all RHR pumps since the valves are common to both RHR trains. Therefore, Note 1 also allows de-energization of all RHR pumps for ≤ 15 minutes when performing testing of the RHR loop supply valves. During this testing the RHR trains are still considered to be OPERABLE since a dedicated operator is stationed at the controls of the valve and is in continuous communication with the control room. In this way, the associated valve can be reopened when a need for residual heat removal operation is indicated.

Note 2 allows one RHR train to be inoperable for a period of ≤ 2 hours, provided that the other train is OPERABLE. This permits periodic surveillance tests to be performed on the inoperable train during the only time when these tests are safe and possible.

An OPERABLE RHR train 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 train is OPERABLE and in operation, redundancy for RHR is lost. Action must be initiated to restore a second train to OPERABLE status. The immediate Completion Time reflects the importance of maintaining the availability of two paths for heat removal.

B.1 and B.2

If no required RHR trains are OPERABLE or in operation, except during conditions permitted by Note 1, all operations involving introduction of coolant into the RCS with boron concentration less than required to meet the minimum SDM of LCO 3.1.1 must be suspended and action must be initiated immediately to restore an RHR train to OPERABLE status and operation. A planned reduction in RCS boron concentration requires forced circulation for uniform dilution, and the margin to criticality must not be reduced in this type of operation. Suspending the introduction of coolant into the RCS of coolant with boron concentration less than required to meet the minimum SDM of LCO 3.1.1 is required to assure continued safe operation. With coolant added without forced circulation, unmixed coolant could be introduced to the core, however, coolant added with boron concentration meeting the minimum SDM maintains acceptable margin to subcritical operations. The immediate Completion Time reflects the importance of maintaining operation for heat removal. The action to restore must continue until one train is restored to OPERABLE status and operation.

SURVEILLANCE REQUIREMENTS

SR 3.4.8.1

This SR requires verification every 12 hours that one train 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 train performance.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.4.8.2 (continued)

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 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.

BASES

APPLICABILITY (continued)

d. Instrumentation and control capability is available for monitoring and maintaining the unit in a cold shutdown condition or refueling condition.

Applicability to movement of irradiated fuel excludes movement of irradiated fuel within a properly sealed spent fuel shipping cask.

The AC power requirements for MODES 1, 2, 3, and 4 are covered in LCO 3.8.1.

ACTIONS

A.1

An offsite circuit would be considered inoperable if it were not available to one required ESF train. Although two trains are required by LCO 3.8.10, the one train with offsite power available may be capable of supporting sufficient required features to allow continuation of CORE ALTERATIONS and fuel movement. By the allowance of the option to declare required features inoperable, with the circuit inoperable, appropriate restrictions will be implemented in accordance with the affected required features LCO's ACTIONS.

A.2.1, A.2.2, A.2.3, A.2.4, B.1, B.2, B.3, and B.4

With the offsite circuit not available to all required trains, the option would still exist to declare all required features inoperable. Since this option may involve undesired administrative efforts, the allowance for sufficiently conservative actions is made. With the required DG inoperable, the minimum required diversity of AC power sources is not available. It is, therefore, required to suspend CORE ALTERATIONS, movement of irradiated fuel assemblies, and operations involving positive reactivity additions that could result in loss of required SDM (MODE 5) or boron concentration (MODE 6). Suspending positive reactivity additions that could result in failure to meet the minimum SDM or boron concentration limit is required to assure continued safe operation. Introduction of coolant inventory must be from sources that have a boron concentration greater than that required in the RCS for minimum SDM or refueling boron concentration. This may result in an overall reduction in RCS boron concentration,

(continued)

BASES

ACTIONS

A.2.1, A.2.2, A.2.3, A.2.4, B.1, B.2, B.3, and B.4
(continued)

but provides acceptable margin to maintaining subcritical operation. Introduction of temperature changes including temperature increases when operating with a positive MTC must also be evaluated to ensure they do not result in a loss of required SDM.

Suspension of these activities does not preclude completion of actions to establish a safe conservative condition. These actions minimize the probability or the occurrence of postulated events. It is further required to immediately initiate action to restore the required AC sources and to continue this action until restoration is accomplished in order to provide the necessary AC power to the unit safety systems.

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

Pursuant to LCO 3.0.6, the Distribution System's ACTIONS would not be entered even if all AC sources to it are inoperable, resulting in de-energization. Therefore, the Required Actions of Condition A are modified by a Note to indicate that when Condition A is entered with no AC power to any required ESF bus, the ACTIONS for LCO 3.8.10 must be immediately entered. This Note allows Condition A to provide requirements for the loss of the offsite circuit, whether or not a train is de-energized. LCO 3.8.10 would provide the appropriate restrictions for the situation involving a de-energized train.

SURVEILLANCE REQUIREMENTS

SR 3.8.2.1

SR 3.8.2.1 requires the SRs from LCO 3.8.1 that are necessary for ensuring the OPERABILITY of the AC sources in other than MODES 1, 2, 3, and 4. SR 3.8.1.16 is not required to be met since only one offsite circuit is required to be OPERABLE. SR 3.8.1.17 is excepted because

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.8.2.1 (continued)

starting independence is not required with the DG(s) that is not required to be operable.

This SR is modified by a Note. The reason for the Note is to minimize the frequency of requiring the OPERABLE DG(s) from being paralleled with the offsite power network or otherwise rendered inoperable during performance of SRs, and to minimize the frequency of deenergizing a required 480 V ESF bus or disconnecting a required offsite circuit during performance of SRs. With limited AC sources available, a single event could compromise both the required circuit and the DG. It is the intent that these SRs must still be capable of being met, but actual performance is not required during periods when the DG and offsite circuit is required to be OPERABLE. Refer to the corresponding Bases for LCO 3.8.1 for a discussion of each SR.

REFERENCES

None.

BASES

ACTIONS

A.1, A.2.1, A.2.2, A.2.3, and A.2.4 (continued)

source(s) inoperable, appropriate restrictions will be implemented in accordance with the affected required features LCO ACTIONS. In many instances, this option may involve undesired administrative efforts. Therefore, the allowance for sufficiently conservative actions is made (i.e., to suspend CORE ALTERATIONS, movement of irradiated fuel assemblies, and operations involving positive reactivity additions) that could result in loss of required SDM (MODE 5) or boron concentration (MODE 6). Suspending positive reactivity additions that could result in failure to meet the minimum SDM or boron concentration limit is required to assure continued safe operation. Introduction of coolant inventory must be from sources that have a boron concentration greater than that required in the RCS for minimum SDM or refueling boron concentration. This may result in an overall reduction in RCS boron concentration, but provides acceptable margin to maintaining subcritical operation. Introduction of temperature changes including temperature increases when operating with a positive MTC must also be evaluated to ensure they do not result in a loss of required SDM.

Suspension of these activities shall not preclude completion of actions to establish a safe conservative condition. These actions minimize probability of the occurrence of postulated events. It is further required to immediately initiate action to restore the required DC electrical power subsystems and to continue this action until restoration is accomplished in order to provide the necessary DC electrical power to the unit safety systems.

The Completion Time of immediately is consistent with the required times for actions requiring prompt attention. The restoration of the required DC electrical power subsystems should be completed as quickly as possible in order to minimize the time during which the unit safety systems may be without sufficient power.

(continued)

BASES (continued)

SURVEILLANCE REQUIREMENTS

SR 3.8.5.1

SR 3.8.5.1 requires performance of all Surveillances required by SR 3.8.4.1 through SR 3.8.4.6. Therefore, see the corresponding Bases for LCO 3.8.4 for a discussion of each SR.

This SR is modified by a Note. The reason for the Note is to preclude requiring the OPERABLE DC sources from being discharged below their capability to provide the required power supply or otherwise rendered inoperable during the performance of SRs. It is the intent that these SRs must still be capable of being met, but actual performance is not required.

REFERENCES

1. UFSAR, Chapter 6.

2. UFSAR, Chapter 15.

BASES

APPLICABILITY (continued)

Applicability to movement of irradiated fuel excludes movement of irradiated fuel within a properly sealed spent fuel shipping cask. AC Instrument Bus Sources requirements for MODES 1, 2, 3, and 4 are covered in LCO 3.8.7.

ACTIONS

A.1, A.2.1, A.2.2, A.2.3, and A.2.4

With one or more required AC instrument bus sources inoperable when two trains are required by LCO 3.8.10, "Distribution Systems—Shutdown," the remaining OPERABLE AC Instrument Bus Sources may be capable of supporting sufficient required features to allow continuation of CORE ALTERATIONS, fuel movement, and operations with a potential for positive reactivity additions. By the allowance of the option to declare required features inoperable with the associated AC Instrument Bus Source inoperable, appropriate restrictions will be implemented in accordance with the affected required features LCOs' Required Actions. In many instances, this option may involve undesired administrative efforts. Therefore, the allowance for sufficiently conservative actions is made (i.e., to suspend CORE ALTERATIONS, movement of irradiated fuel assemblies, and operations involving positive reactivity additions) that could result in loss of required SDM (MODE 5) or boron concentration (MODE 6). Suspending positive reactivity additions that could result in failure to meet the minimum SDM or boron concentration limit is required to assure continued safe operation. Introduction of coolant inventory must be from sources that have a boron concentration greater than that required in the RCS for minimum SDM or refueling boron concentration. This may result in an overall reduction in RCS boron concentration, but provides acceptable margin to maintaining subcritical operation. Introduction of temperature changes including temperature increases when operating with a positive MTC must also be evaluated to ensure they do not result in a loss of required SDM.

Suspension of these activities shall not preclude completion of actions to establish a safe conservative condition. These actions minimize the probability of the occurrence of postulated events. It is further required to immediately initiate action to restore the required AC Instrument Bus Sources and to continue this action until restoration is accomplished in order to provide the necessary AC Instrument Bus Source of power to the unit safety systems.

(continued)

BASES

ACTIONS

A.1, A.2.1, A.2.2, A.2.3, and A.2.4 (continued)

The Completion Time of immediately is consistent with the required times for actions requiring prompt attention. The restoration of the required AC Instrument Bus Sources should be completed as quickly as possible in order to minimize the time the unit safety systems may be without power or powered from a non-preferred source.

SURVEILLANCE REQUIREMENTS

SR 3.8.8.1

This Surveillance verifies that the inverters are functioning properly with all required circuit breakers closed and required AC instrument buses energized from the inverter and that required circuit breakers are closed and required instrument buses are energized from the CVTs or other sources, as allowed by LCO 3.8.8.b. The verification of proper voltage and frequency output for the inverters ensures that the required power is readily available for the instrumentation connected to the associated AC instrument buses. The 7 day Frequency takes into account the redundant capability of the AC Instrument Bus Sources, other indications available in the control room that alert the operator to inverter malfunctions, and administrative requirements governing alignment of electrical equipment.

This SR is modified by a Note which states that voltage and frequency measurement is not required for the AC instrument buses supplied from CVTs. For these buses, observing status lights, instrument displays, etc. is sufficient to confirm that the required power is readily available to the AC instrument buses supplied from CVTs

REFERENCES

1. UFSAR, Chapter 6.

2. UFSAR, Chapter 15.

BASES (continued)

ACTIONS

A.1, A.2.1, A.2.2, A.2.3, A.2.4, and A.2.5

Although redundant required features may require redundant trains of electrical power distribution subsystems to be OPERABLE, one OPERABLE distribution subsystem train may be capable of supporting sufficient required features to allow continuation of CORE ALTERATIONS and fuel movement. By allowing the option to declare required features associated with an inoperable distribution subsystem inoperable, appropriate restrictions are implemented in accordance with the affected distribution subsystem LCO's Required Actions. In many instances, this option may involve undesired administrative efforts. Therefore, the allowance for sufficiently conservative actions is made (i.e., to suspend CORE ALTERATIONS, movement of irradiated fuel assemblies, and operations involving positive reactivity additions that could result in loss of required SDM (MODE 5) or boron concentration (MODE 6)). Suspending positive reactivity additions that could result in failure to meet the minimum SDM or boron concentration limit is required to assure continued safe operation. Introduction of coolant inventory must be from sources that have a boron concentration greater than that required in the RCS for minimum SDM or refueling boron concentration. This may result in an overall reduction in RCS boron concentration, but provides acceptable margin to maintaining subcritical operation. Introduction of temperature changes including temperature increases when operating with a positive MTC must also be evaluated to ensure they do not result in a loss of required SDM.

Suspension of these activities does not preclude completion of actions to establish a safe conservative condition. These actions minimize the probability of the occurrence of postulated events. It is further required to immediately initiate action to restore the required AC and DC electrical power distribution subsystems and to continue this action until restoration is accomplished in order to provide the necessary power to the unit safety systems.

Notwithstanding performance of the above conservative Required Actions, a required residual heat removal (RHR) subsystem may be inoperable. In this case, Required Actions A.2.1 through A.2.4 do not adequately address the concerns relating to coolant circulation and heat removal. Pursuant to LCO 3.0.6, the RHR ACTIONS would not be entered.

(continued)

BASES

ACTIONS

A.1, A.2.1, A.2.2, A.2.3, A.2.4, and A.2.5 (continued)

Therefore, Required Action A.2.5 is provided to direct declaring RHR inoperable, which results in taking the appropriate RHR actions.

The Completion Time of immediately is consistent with the required times for actions requiring prompt attention. The restoration of the required distribution subsystems should be completed as quickly as possible in order to minimize the time the unit safety systems may be without power.

SURVEILLANCE REQUIREMENTS

SR 3.8.10.1

This Surveillance verifies that the AC, DC, and AC instrument bus electrical power distribution subsystems are functioning properly, with all the buses energized. The 7 day Frequency takes into account the capability of the electrical power distribution subsystems, and other indications available in the control room that alert the operator to subsystem malfunctions.

This SR is modified by Note which states that voltage measurement is not required for the AC Instrument buses supplied from Constant Voltage Transformers (CVTs). For these buses confirmation that the buses are energized by observing status lights, instrument displays, etc., is sufficient to confirm the buses are energized.

REFERENCES

1. UFSAR, Chapter 6.

2. UFSAR, Chapter 15.

BASES

LCO (continued)

≤ 0.9433 is maintained during fuel handling operations. Violation of the LCO could lead to an inadvertent criticality during MODE 6.

APPLICABILITY

This LCO is applicable in MODE 6 to ensure that the fuel in the reactor vessel will remain subcritical. The required boron concentration ensures a k_{eff} ≤ 0.9433. Above MODE 6, LCO 3.1.1, "SHUTDOWN MARGIN (SDM)," ensure that an adequate amount of negative reactivity is available to shut down the reactor and maintain it subcritical.

ACTIONS

A.1 and A.2

Continuation of CORE ALTERATIONS or positive reactivity additions (including actions to reduce boron concentration) is contingent upon maintaining the unit in compliance with the LCO. If the boron concentration of any coolant volume in the RCS, the refueling canal, or the refueling cavity is less than its limit, all operations involving CORE ALTERATIONS or positive reactivity additions must be suspended immediately.

Suspension of CORE ALTERATIONS and positive reactivity additions shall not preclude moving a component to a safe position. Operations that individually add limited positive reactivity (e.g., temperature fluctuations, inventory addition, or temperature control fluctuations), but when combined with all other operations affecting core reactivity (e.g., intentional boration) result in overall net negative reactivity addition, are not precluded by this action.

A.3

In addition to immediately suspending CORE ALTERATIONS and positive reactivity additions, boration to restore the concentration must be initiated immediately.

In determining the required combination of boration flow rate and concentration, no unique Design Basis Event must be satisfied. The only requirement is to restore the boron concentration to its required value as soon as possible. In order to raise the boron concentration as soon as possible,

(continued)

BASES

ACTIONS

A.3 (continued)

the operator should begin boration with the best source available for unit conditions.

Once actions have been initiated, they must be continued until the boron concentration is restored. The restoration time depends on the amount of boron that must be injected to reach the required concentration.

SURVEILLANCE REQUIREMENTS

SR 3.9.1.1

This SR ensures that the coolant boron concentration in the RCS, the refueling canal, and the refueling cavity is within the COLR limits. The boron concentration of the coolant in each volume is determined periodically by chemical analysis.

A minimum Frequency of once every 72 hours is a reasonable amount of time to verify the boron concentration of representative samples. The Frequency is based on operating experience, which has shown 72 hours to be adequate.

REFERENCES

1. UFSAR, Section 3.1.
2. UFSAR, Chapter 15.

BASES (continued)

APPLICABILITY

In MODE 6, the source range neutron flux monitors must be OPERABLE to determine changes in core reactivity. There are no other direct means available to check core reactivity levels. In MODES 2, 3, 4, and 5, these same installed source range detectors and circuitry are also required to be OPERABLE by LCO 3.3.1, "Reactor Protection System (RPS) Instrumentation."

ACTIONS

A.1 and A.2

With only one required source range neutron flux monitor OPERABLE, an OPERABLE Post Accident Monitor (PAM) source range neutron monitor may be used to provide the required redundancy. Required Action A.1 ensures that the PAM source range neutron monitor is indicating in the control room. Since the PAM source range neutron monitor provides only visual indication of count rate in the Control Room and has no audible count rate capability, Required Action A.2 requires that the indicated count rate from the PAM source range neutron monitor be logged within 30 minutes and once per 30 minutes thereafter. The Completion Times are reasonable considering that there remains one OPERABLE source range monitor with audible count rate and alarm function, and recognition of the time required to complete manual operator actions in response to the boron dilution event.

B.1 and B.2

If the Required Actions and Completion Times of Condition A are not met, redundant means of monitoring core reactivity conditions are not assured. CORE ALTERATIONS and introduction of coolant into the RCS with boron concentration less than required to meet the minimum boron concentration of LCO 3.9.1 must be suspended immediately. Suspending positive reactivity additions that could result in failure to meet the minimum boron concentration limit is required to assure continued safe operation. Introduction of coolant inventory must be from sources that have a boron concentration greater than that required in the RCS for minimum refueling boron concentration. This may result in an overall reduction in RCS boron concentration, but provides acceptable margin to maintaining subcritical

(continued)

BASES

ACTIONS

B.1 and B.2 (continued)

operation. Performance of Required Action B.1 shall not preclude completion of movement of a component to a safe position.

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

With no source range neutron flux monitor OPERABLE, action to restore a monitor to OPERABLE status shall be initiated immediately. Once initiated, action shall be continued until a source range neutron flux monitor is restored to OPERABLE status. Since the source range neutron monitors are the only direct means of monitoring core reactivity conditions, CORE ALTERATIONS and positive reactivity additions must be suspended immediately. Performance of Required Action C.2 shall not preclude completion of a component to a safe condition.

C.4

With no source range neutron flux monitor OPERABLE, there are no direct means of detecting changes in core reactivity. However, since CORE ALTERATIONS and positive reactivity additions are not to be made, the core reactivity condition is stabilized until the source range neutron flux monitors are OPERABLE. This stabilized condition is determined by performing SR 3.9.1.1 to ensure that the required boron concentration exists.

The Completion Time of 4 hours is sufficient to obtain and analyze a reactor coolant sample for boron concentration. The Frequency of once per 12 hours ensures that unplanned changes in boron concentration would be identified. The 12 hour Frequency is reasonable, considering the low probability of a change in core reactivity during this time period.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.9.2.1

SR 3.9.2.1 is the performance of a CHANNEL CHECK, which is a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that the two indication channels should be consistent with core conditions. Changes in fuel loading and core geometry can result in significant differences between source range channels, but each channel should be consistent with its local conditions.

The Frequency of 12 hours is consistent with the CHANNEL CHECK Frequency specified similarly for the same instruments in LCO 3.3.1.

SR 3.9.2.2 is the performance of a CHANNEL CALIBRATION every 18 months. This SR is modified by a Note stating that neutron detectors are excluded from the CHANNEL CALIBRATION. The CHANNEL CALIBRATION for the source range neutron flux monitors consists of obtaining the detector plateau or preamp discriminator curves, evaluating those curves, and comparing the curves to the manufacturer's data. The CHANNEL CALIBRATION for the PAM source range neutron flux monitors only applies to the portion of the channel applicable to providing visual indication of neutron count rate in the Control Room. The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage. Operating experience has shown these components usually pass the Surveillance when performed at the 18 month Frequency.

REFERENCES

1. UFSAR, Section 3.1.

2. UFSAR, Section 15.4.6.

BASES

APPLICABLE SAFETY ANALYSES (continued)

reduction. Therefore, the RHR System is retained as a Specification.

LCO

Only one RHR train is required for decay heat removal in MODE 6, with the water level ≥ 23 ft above the top of the reactor vessel flange. Only one RHR train is required to be OPERABLE, because the volume of water above the reactor vessel flange provides backup decay heat removal capability. At least one RHR train must be OPERABLE and in operation to provide:

a. Removal of decay heat;

b. Mixing of borated coolant to minimize the possibility of criticality; and

c. Indication of reactor coolant temperature.

An OPERABLE RHR train includes an RHR pump, a heat exchanger, valves, piping, instruments, and controls to ensure an OPERABLE flow path. The flow path starts in one of the RCS hot legs and is returned to the RCS cold legs.

The LCO is modified by a Note that allows the required operating RHR train to be removed from service for up to 1 hour in any 8 hour period, provided no operations are permitted that would dilute the RCS boron concentration with coolant at boron concentrations less than required to meet the minimum boron concentration of LCO 3.9.1. Boron concentration reduction, with coolant at boron concentrations less than required to assure the minimum required RCS boron concentration is maintained, is prohibited because uniform concentration distribution cannot be ensured without forced circulation. This permits operations such as core mapping or alterations in the vicinity of the reactor vessel hot leg nozzles and RCS to RHR isolation valve testing. During this 1 hour period, decay heat is removed by natural convection to the large mass of water in the refueling cavity.

BASES (Continued)

APPLICABILITY

One RHR train must be OPERABLE and in operation in MODE 6, with the water level ≥ 23 ft above the top of the reactor vessel flange, to provide decay heat removal. The 23 ft water level was selected because it corresponds to the 23 ft requirement established for fuel movement in LCO 3.9.6, "Refueling Cavity Water Level." Requirements for the RHR System in other MODES are covered by LCOs in Section 3.4, Reactor Coolant System (RCS), and Section 3.5, Emergency Core Cooling Systems (ECCS). RHR train requirements in MODE 6 with the water level < 23 ft are located in LCO 3.9.5, "Residual Heat Removal (RHR) and Coolant Circulation—Low Water Level."

ACTIONS

RHR train requirements are met by having one RHR train OPERABLE and in operation, except as permitted in the Note to the LCO.

A.1

If RHR train requirements are not met, there will be no forced circulation to provide mixing to establish uniform boron concentrations. Suspending positive reactivity additions that could result in failure to meet the minimum boron concentration limit is required to assure continued safe operation. Introduction of coolant inventory must be from sources that have a boron concentration greater than that required in the RCS for minimum refueling boron concentration. This may result in an overall reduction in RCS boron concentration, but provides acceptable margin to maintaining subcritical operation.

A.2

If RHR train requirements are not met, actions shall be taken immediately to suspend loading of irradiated fuel assemblies in the core. With no forced circulation cooling, decay heat removal from the core occurs by natural convection to the heat sink provided by the water above the core. A minimum refueling water level of 23 ft above the reactor vessel flange provides an adequate available heat sink. Suspending any operation that would increase decay heat load, such as loading a fuel assembly, is a prudent action under this condition.

(continued)

BASES

ACTIONS (continued)

A.3

If RHR train requirements are not met, actions shall be initiated and continued in order to satisfy RHR train requirements. With the unit in MODE 6 and the refueling water level ≥ 23 ft above the top of the reactor vessel flange, corrective actions shall be initiated immediately.

A.4

If RHR train requirements are not met, all containment penetrations providing direct access from the containment atmosphere to the outside atmosphere must be closed within 4 hours. With the RHR train requirements not met, the potential exists for the coolant to boil and release radioactive gas to the containment atmosphere. Closing containment penetrations that are open to the outside atmosphere ensures dose limits are not exceeded.

The Completion Time of 4 hours is reasonable, based on the low probability of the coolant boiling in that time.

SURVEILLANCE REQUIREMENTS

SR 3.9.4.1

This Surveillance requires verification every 12 hours that one train 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 the other indications and alarms available to the operator in the control room for monitoring the RHR System.

REFERENCES

1. UFSAR, Section 5.4.4.

BASES

ACTIONS (continued)

B.1

Completion Time is necessary for an operator to initiate corrective actions.

If no RHR train is in operation, there will be no forced circulation to provide mixing to establish uniform boron concentrations. Suspending positive reactivity additions that could result in failure to meet the minimum boron concentration limit is required to assure continued safe operation. Introduction of coolant inventory must be from sources that have a boron concentration greater than that required in the RCS for minimum refueling boron concentration. This may result in an overall reduction in RCS boron concentration, but provides acceptable margin to maintaining subcritical operation.

B.2

If no RHR train is in operation, actions shall be initiated immediately, and continued, to restore one RHR train to operation. Since the unit is in Conditions A and B concurrently, the restoration of two OPERABLE RHR trains and one operating RHR train should be accomplished expeditiously.

B.3

If no RHR train is in operation, all containment penetrations providing direct access from the containment atmosphere to the outside atmosphere must be closed within 4 hours. With the RHR train requirements not met, the potential exists for the coolant to boil and release radioactive gas to the containment atmosphere. Closing containment penetrations that are open to the outside atmosphere ensures that dose limits are not exceeded.

The Completion Time of 4 hours is reasonable, based on operating experience to close all penetrations.

(continued)

BASES (continued)

SURVEILLANCE REQUIREMENTS

SR 3.9.5.1

This SR requires verification every 12 hours that one train 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 train performance.

SR 3.9.5.2

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. 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. UFSAR, Section 5.4.4.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION

BY THE OFFICE OF NUCLEAR REACTOR REGULATION

REGARDING OPERATIONS INVOLVING POSITIVE REACTIVITY ADDITIONS

H. B. ROBINSON, UNIT 2

DOCKET NO. 50-261

1.0 INTRODUCTION

By letter dated August 10, 2000 (Reference 1), Carolina Power & Light Company (CP&L, the licensee) submitted an application to amend the H. B. Robinson Steam Electric Plant, Unit 2 (HBRSEP2) Technical Specifications (TS). The proposed change would revise various TS required actions suspending operations involving reactivity additions and would also revise various Limiting Condition for Operation (LCO) Notes precluding reduction in boron concentration.

2.0 BACKGROUND

HBRSEP2 adopted the Standard Technical Specifications (STS) in 1997 under Amendment 176. Since then, the industry and the NRC staff have been working to improve the STS NUREGs, and as a result, generic changes have been developed. The proposed amendment adopts generic changes in Technical Specification Task Force (TSTF) TS Change Traveler TSTF-286, Revision 2, which was incorporated into the STS by the staff on July 6, 2000 (Reference 2). This TSTF revises most TS requiring suspension of operations involving positive reactivity additions to limit the introduction into the reactor coolant system (RCS) of reactivity, which would maintain the required shutdown margin (SDM) or required refueling boron concentration, as applicable. TSTF-286, Revision 2, clarifies limits on the introduction of reactivity such that the TS-required SDM or refueling boron concentration will be satisfied. The licensee also identified plant-specific differences between their proposed changes and TSTF-286, Revision 2, wherever the proposed changes are not consistent with TSTF-286, Revision 2.

HBRSEP2 employs two independent reactivity control systems: one uses the movable control and shutdown Rod Cluster Control Assemblies (RCCAs), and the other uses the Chemical and Volume Control System (CVCS) to adjust the soluble boron concentration. In MODES 1 and 2, both systems are used to compensate for the reactivity effects from the fuel and coolant temperature changes in the RCS during power operation from full load to no load condition. In MODES 3, 4, and 5, the CVCS is used to compensate for the reactivity effects from temperature and xenon changes. In MODE 6, the CVCS is used to maintain the boron concentration within the required limits.

The HBRSEP2 TS SDM limit provides sufficient subcritical reactivity margin to ensure that the specified acceptable fuel design limits (SAFDLs) will not be exceeded for normal shutdown and Anticipated Operational Occurrences (AOOs). In MODES 1, 2, 3, 4, and 5, the TS-required SDM specification assumes that the single RCCA with the highest reactivity worth remains fully withdrawn. Given this assumption, in MODES 1 and 2 the TS specify the required SDM, which is the amount of subcriticality that would immediately occur following the scram or insertion of both control and shutdown RCCAs that had been withdrawn, assuming the fuel and moderator temperatures are at nominal hot zero power values. Small reactivity changes due to RCS coolant inventory management and temperature control are also considered in specifying SDM, including moderator temperature coefficient effects. In MODES 3, 4, and 5, the TS specify the required SDM, which is the reactivity margin by which the reactor will remain subcritical with the RCCAs fully inserted, given the assumption identified above.

In MODE 6, reactor subcriticality margin is ensured by the limit on the boron concentration for the RCS, the refueling canal, and the refueling cavity during refueling. The refueling boron concentration limit is specified for each cycle in the Core Operating Limits Report (COLR).

3.0 EVALUATION

3.1 Summary and Licensee Justification of Proposed Changes

In their letter dated August 10, 2000, the licensee requested a change to the TS for HBRSEP2, in accordance with 10 CFR 50.90, to revise TS ACTIONS that currently require suspending all operations involving any positive reactivity additions, and to revise TS LCO Notes that preclude any reduction in boron concentration. The proposed TS changes would allow the introduction of reactivity while maintaining RCS coolant inventory and temperature as long as the TS-required SDM or refueling boron concentration is properly maintained. The licensee stated that these necessary operations may involve additions to the RCS of cooler borated water or require makeup from borated sources that have lower boron concentration than the existing RCS boron concentration. The licensee indicated that these changes would be allowed if the overall effect on core reactivity still assures that the TS-required SDM is maintained.

The proposed amendment would revise 12 specific TS relating to HBRSEP2 positive reactivity additions while in shutdown modes. The proposed changes relax TS involving positive reactivity additions to the shutdown reactor. According to the licensee, the proposed changes would allow small, controlled, safe insertions of positive reactivity while in shutdown modes.

The licensee stated that the proposed changes conform closely to TSTF-286, Revision 2, and revise most HBRSEP2 TS Actions requiring suspension of operations involving positive reactivity additions to allow positive reactivity additions into the RCS, but limit such additions to that which would maintain the TS-required shutdown margin SDM or refueling boron concentration, as applicable. The licensee also identified plant-specific differences between the proposed changes and TSTF-286, Revision 2, as part of their August 10, 2000, submittal. A correlation of the proposed changes to the complete list of TSTF-286 changes was provided to the staff during a follow-up phone call with the licensee on October 19, 2000. The correlation is summarized in the Appendix to this Safety Evaluation.

3.2 Staff Evaluation

The changes in TSTF-286, Revision 2, revise the following: 1) actions that require suspension of operations involving positive reactivity additions; and 2) various TS Notes precluding reduction in boron concentration. The revised STS limit the introduction into the RCS of reactivity to that which would maintain the TS-required SDM or required refueling boron concentrations, as applicable. Additionally, the remaining STS actions that require suspension of positive reactivity changes have a bases addition to clarify that the intent is to permit a "net" positive reactivity operation.

The justification for incorporating TSTF-286, Revision 2, into the STS is that the change provides the flexibility necessary to provide for continued safe reactor operations, while also limiting any potential for excess positive reactivity addition. The actions that preclude positive reactivity changes or reduction in boron concentration ensure either no power increases, or continued margin to core criticality operations. During conditions in which these actions may be required, the following various activities for unit operation must be continued: RCS inventory must be maintained, and RCS temperature must be controlled. These activities necessarily involve addition to the RCS of cooler water and may involve inventory makeup from sources that are at boron concentrations less than the current RCS concentration. These activities should not be precluded to ensure that, for the worst-case overall effect on the core, there would still be assurance that the required SDM is maintained.

The TS-required SDM at HBRSEP2 is determined during the reload core design and is ensured during plant operation by the positioning of the RCCA control and shutdown rod banks and through adjustments of the soluble boron concentration in the reactor coolant.

In MODES 1 through 4, the minimum required SDM is assumed as an initial condition for the reload safety analyses to ensure that the SAFDLs will not be exceeded for normal shutdown and AOOs, assuming that the highest worth RCCA remains stuck out following a reactor scram. Currently for HBRSEP2, the main steamline break is the most limiting event to establish the minimum SDM value for LCO 3.1.1, and this ensures that the departure from nucleate boiling ratio safety limit is not exceeded.

In MODES 5 and 6, the reactivity of the core must be consistent with the initial conditions assumed for the boron dilution accident analysis to ensure the minimum time required for operator action to terminate dilution is met. This requirement is met by the requirements of LCO 3.1.1 for the minimum SDM and LCO 3.9.1 for the minimum boron concentration. Additionally, for MODE 6, the required boron concentration ensures the required subcriticality during refueling operations.

TSTF-286, Revision 2, ensures that, under the specified plant conditions for each operating mode, unplanned power increases or reductions in the margin to core criticality are precluded. The proposed revision to existing TS Notes and the addition of wording [notes] to the TS ACTIONS allow the small reactivity variations that result from the temperature or boron concentration fluctuations associated with normal RCS inventory management or temperature control. These normal activities are permitted to be performed while maintaining the minimum SDM requirement of LCO 3.1.1 and the minimum boron concentration requirement of LCO 3.9.1. The HBRSEP2 plant-specific clarifications provide the staff the assurance that the initial

assumptions of the most limiting accident safety analyses are still maintained, while acknowledging that necessary compensatory activities may still be taken by adding cooler water to the RCS to lower the current temperature; and makeup sources are of borated water at boron concentrations less than the current RCS boron concentration. The licensee has stated that these compensatory activities are part of plant procedures, and this would assure that the overall effect on core reactivity is properly monitored and the TS-required SDM or the required refueling boron concentration maintained.

In its application, the licensee provided the same justification for HBRSEP2 as that stated by the staff for incorporating TSTF-286, Revision 2, into the STS; however, where plant-specific design would dictate differences, the licensee proposed the same changes to the TS as are given in the TSTF, but provided the staff with plant-specific justification for any differences or exceptions, as discussed below.

a) The proposed revisions include adding notes to

- TS 3.3.1, "RPS Instrumentation," Required Actions G.1, and I.1.

Currently, at HBRSEP2, Required Actions G.1 and I.1 simply state:

"Suspend operations involving positive reactivity additions."

The equivalent notes in TSTF-286, Revision 2, would state that:

"Limited plant cooldown or boron dilution is allowed provided the change is accounted for in the calculated SDM."

However, in initiating shutting down the reactor from MODES 1 and 2, the required SDM at HBRSEP2 is not normally a calculated value. Instead, the required SDM is ensured by plant operation that is consistent with the rod insertion limits of LCO 3.1.4, "Rod Group Alignment Limits," and LCO 3.1.5, "Shutdown Bank Insertion Limits," and with the temperature limits of LCO 3.4.2, "RCS Minimum Temperature for Criticality."

Therefore, the proposed HBRSEP2 changes are revised to state that:

"Limited boron concentration changes associated with RCS inventory control or limited plant temperature changes are allowed."

As stated previously, TSTF-286, Revision 2, ensures that, under the specified plant conditions for each operating mode, unplanned power increases or reductions in the margin to core criticality are precluded. The proposed revision to existing TS Notes and the addition of wording [notes] to the TS ACTIONS allow the small reactivity variations that result from the temperature or boron concentration fluctuations associated with normal RCS inventory management or temperature control. These normal activities would be permitted to be performed while maintaining the minimum SDM requirement of LCO 3.1.1 and the minimum boron concentration requirement of LCO 3.9.1. The HBRSEP2 plant-specific clarification provides the staff the assurance that the initial assumptions of the most limiting accident safety analyses are still maintained, while acknowledging that necessary compensatory activities may still be taken by adding cooler water to the RCS to lower the current temperature; and makeup

sources may be of borated water at boron concentrations less than the current RCS boron concentration. The licensee has stated that these compensatory activities are part of plant procedures. and thus the proposed TS change would allow limited boron concentration changes or limited plant temperature changes. The staff has determined that this change is acceptable because the overall effect on core reactivity is being monitored and the required refueling boron concentration is being maintained.

Furthermore, the staff finds the wording "temperature changes" refers to the fact that the moderator temperature coefficient must be considered both during cooldown and heatup operations. Similarly, the staff finds the wording "boron concentration changes associated with RCS inventory control" is more descriptive of operations at HBRSEP2 than "boron dilution." These wording changes are both more accurate with regard to the existing HBRSEP2's design of employing two independent reactivity control systems: one using the movable control and shutdown RCCAs, and the other using the CVCS, and this additional clarification allows the adoption of TSTF-286, Revision 2.

These changes maintain SDM and reactor coolant boron concentration consistent with TSTF-286, Revision 2, but are clarified by additional compensatory activities during operation to more accurately define their plant-specific application at HBRSEP2. Therefore, the staff finds the proposed changes, with this plant-specific exception, acceptable.

b) The proposed revision also includes a note to

- TS 3.3.1, "RPS Instrumentation," Required Action L.1

Currently at HBRSEP2, Required Action L.1 simply states:

"Suspend operations involving positive reactivity additions."

The proposed HBRSEP2 TS revision would add a note to state that:

"Plant temperature changes are allowed provided the temperature change is accounted for in the calculated SDM."

The licensee provided the same justification for HBRSEP2 as that stated by the staff for incorporating TSTF-286, Revision 2, into the STS. This change maintains SDM, consistent with TSTF-286, Revision 2, and is applicable to HBRSEP2; therefore, it is acceptable to the staff.

c) Required Actions would also be revised for the following TS

- TS 3.4.5, "RCS Loops - MODE 3," Required Action D.2,
- TS 3.4.6, "RCS Loops - MODE 4," Required Action C.1,
- TS 3.4.7, "RCS Loops - MODE 5, Loops Filled," Required Action B.1,
- TS 3.4.8, "RCS Loops - MODE 5, Loops Not Filled," Required Action B.1

to suspend operations that would cause introduction into the RCS of coolant with boron concentration less than required to meet SDM of LCO 3.1.1.

The licensee provided the same justification for HBRSEP2 as that stated by the staff for incorporating TSTF-286, Revision 2, into the STS. These changes maintain reactor coolant boron concentration, consistent with TSTF-286, Revision 2, and are directly applicable to HBRSEP2; therefore, they are acceptable to the staff.

d) Notes would also be revised for the following LCOs

- LCO 3.4.5, "RCS Loops - MODE 3," Note a,
- LCO 3.4.6, "RCS Loops - MODE 4," Note 1a,
- LCO 3.4.7, "RCS Loops - MODE 5, Loops Filled," Note 1a,
- LCO 3.4.8, "RCS Loops - MODE 5, Loops Not Filled," Note 1b

to state that no operations are permitted that would cause introduction into the RCS of coolant with boron concentration less than required to meet the SDM of LCO 3.1.1.

The licensee provided the same justification for HBRSEP2 as that stated by the staff for incorporating TSTF-286, Revision 2, into the STS. These changes maintain the reactor coolant boron concentration, consistent with TSTF-286, Revision 2, and are directly applicable to HBRSEP2; therefore, they are acceptable to the staff.

e) Required Actions would also be revised for:

- TS 3.8.2, "AC Sources - Shutdown," Required Actions A.2.3 and B.3,
- TS 3.8.5, "DC Sources - Shutdown," Required Action A.2.3,
- TS 3.8.8, "AC Instrument Buses - Shutdown," Required Action A.2.3,
- TS 3.8.10, "Distribution Systems - Shutdown," Required Action A.2.3

to state suspend operations involving positive reactivity additions that could result in loss of required SDM or boron concentration.

The licensee provided the same justification for HBRSEP2 as that stated by the staff for incorporating TSTF-286, Revision 2, into the STS. These changes maintain SDM and reactor coolant boron concentration, consistent with TSTF-286, Revision 2, and are directly applicable to HBRSEP2; therefore, they are acceptable to the staff.

f) One Required Action would be revised for

- TS 3.9.2, "Nuclear Instrumentation," Required Action B.2

to state suspend operations that would cause introduction into the RCS of coolant with boron concentration less than required to meet boron concentration of LCO 3.9.1.

The licensee provided the same justification for HBRSEP2 as that stated by the staff for incorporating TSTF-286, Revision 2, into the STS. These changes maintain the reactor coolant boron concentration, consistent with TSTF-286, Revision 2, and are directly applicable to HBRSEP2; therefore, they are acceptable to the staff.

g) The LCO note would be revised for

- LCO 3.9.4, "Residual Heat Removal (RHR) and Coolant Circulation - High Water Level"

to state the required RHR train may be removed from operation for ≤1 hour in any 8 hour period, provided no operations are permitted that would cause introduction into the RCS of coolant with boron concentration less than that required to meet the minimum required boron concentration of LCO 3.9.1.

The licensee provided the same justification for HBRSEP2 as that stated by the staff for incorporating TSTF-286, Revision 2, into the STS. These changes maintain the reactor coolant boron concentration consistent with TSTF-286, Revision 2, and are directly applicable to HBRSEP2; therefore, they are acceptable to the staff.

h) Two Required Actions would be revised for

- TS 3.9.4, "RHR and Coolant Circulation - High Water Level," Required Action A.1,
- TS 3.9.5, "RHR and Coolant Circulation - Low Water Level," Required Action B.1

to state suspend operations that would cause introduction into the RCS of coolant with boron concentration less than required to meet boron concentration of LCO 3.9.1.

The licensee provided the same justification for HBRSEP2 as that stated by the staff for incorporating TSTF-286, Revision 2, into the STS. These changes maintain the reactor coolant boron concentration, consistent with TSTF-286, Revision 2, and are directly applicable to HBRSEP2; therefore, they are acceptable to the staff.

i) A revision is made to:

- Bases for TS 3.9.1, "Boron Concentration," Required Action A.2

to clarify that CORE ALTERATIONS <u>and</u> positive reactivity additions are both to be immediately suspended.

This is an editorial wording correction, and a heading insertion is also made for completeness. The staff finds this change consistent with the approved TSTF-286, Revision 2. It is also applicable to HBRSEP2, and is, therefore, acceptable to the staff.

In addition to the above review, the staff also noted that the associated Bases for the above TS are also revised for consistency with the proposed changes, and the proposed changes to the TS Bases were submitted with the submittal.

Based on the above review, the staff finds that the proposed TS changes for application to the HBRSEP2 plant are consistent with TSTF-286, Revision 2.

The Technical Specifications Branch staff, with input from Reactor Systems Branch staff, has reviewed the licensee's application with the supporting documentation and has prepared the above staff evaluation. Based on our review, the staff concludes that the proposed 12 specific changes to the HBRSEP2 TS are acceptable because these TS changes continue to ensure

that the required minimum SDM and boron concentration margins are met and they are consistent with the reload safety analyses assumptions. In addition, they are consistent with TSTF-286, Revision 2.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the State of South Carolina official was notified of the proposed issuance of the amendment. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

This amendment involves a change in the installation or use of a facility component located within the restricted area, as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (65 FR 54084). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

6.0 CONCLUSION

The staff has concluded, based on the consideration discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public. Therefore, the proposed changes are acceptable.

7.0 REFERENCES

1. Letter from R. L. Warden (CP&L), to USNRC, "Request for Technical Specification Change for Operations Involving Positive Reactivity Additions," dated August 10, 2000.

2. Letter from W. D. Beckner, USNRC, to J. Davis, Nuclear Energy Institute, July 6, 2000.

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APPENDIX

A Correlation of Proposed Changes to Approved TSTF-286, Revision 2 TS Changes
The following TSTF-286 TS changes are applicable to the HBR-2 plant but required some additional justification or clarification before incorporation, as discussed in the evaluations in Section 2.

- Action 3.3.1.G — RTS Instrumentation
- Action 3.3.1.G Bases — RTS Instrumentation
- Action 3.3.1.I — RTS Instrumentation
- Action 3.3.1.I Bases — RTS Instrumentation
- Action 3.3.1.L — RTS Instrumentation
- Action 3.3.1.L Bases — RTS Instrumentation

The following TSTF-286 TS changes are directly applicable to the HBR-2 plant and are therefore incorporated as written:

- LCO 3.4.5 — RCS Loops - MODE 3
- LCO 3.4.6 — RCS Loops - MODE 4
- Action 3.4.6 — RCS Loops - MODE 4
- Action 3.4.7 — RCS Loops - MODE 5, Loops Filled
- Action 3.4.7.B — RCS Loops - MODE 5, Loops Filled
- LCO 3.4.8 — RCS Loops - MODE 5, Loops Not Filled
- LCO 3.4.8 Bases — RCS Loops - MODE 5, Loops Not Filled
- LCO 3.4.8B — RCS Loops - MODE 5, Loops Not Filled
- Action 3.8.2.A — AC Sources - Shutdown
- Action 3.8.2.B — AC Sources - Shutdown
- Action 3.8.5.A — DC Sources - Shutdown
- LCO 3.8.8.A — AC Instrument Buses - Shutdown
- Action 3.8.10 — Distribution Systems - Shutdown
- Action 3.4.5.D — RCS Loops - MODE 3
- Action 3.4.5.D Bases — RCS Loops - MODE 3
- LCO 3.9.4 — RHR and Coolant Circulation - High Water Level

The following TSTF-286 TS changes are also applicable to the HBR-2 plant and are incorporated with minor editorial changes:

- LCO 3.4.5 Bases — RCS Loops - MODE 3
- LCO 3.4.6 Bases — RCS Loops - MODE 4
- Action 3.4.6.C Bases — RCS Loops - MODE 4
- LCO 3.4.7 Bases — RCS Loops - MODE 5, Loops Filled
- Action 3.4.7.B Bases — RCS Loops - MODE 5, Loops Filled
- LCO 3.4.8.B Bases — RCS Loops - MODE 5, Loops Not Filled
- Action 3.8.2.A Bases — AC Sources - Shutdown
- Action 3.8.5.A Bases — DC Sources - Shutdown
- LCO 3.8.8.A Bases — AC Instrument Buses
- Action 3.8.10 Bases — Distribution Systems - Shutdown
- Action 3.9.1.A Bases — Boron Concentration
- Action 3.9.2.B — Nuclear Instrumentation

- Action 3.9.2.B Bases — Nuclear Instrumentation
- LCO 3.9.4 Bases — RHR and Coolant Circulation - High Water Level
- Action 3.9.4.A — RHR and Coolant Circulation - High Water Level
- Action 3.9.4.A Bases — RHR and Coolant Circulation - High Water Level
- Action 3.9.5.B — RHR and Coolant Circulation - Low Water Level
- Action 3.9.5.B Bases — RHR and Coolant Circulation - Low Water Level

The following TSTF-286 TS changes are <u>not</u> applicable to the HBR-2 plant and are therefore not incorporated:

- Action 3.3.9.B — BDPS
- Action 3.3.9.B Bases — BDPS
- Background 3.4.18 Bases — RCS Isolated Loop Startup
- LCO 3.4.18 — RCS Isolated Loop Startup
- SR 3.4.18.2 — RCS Isolated Loop Startup
- SR 3.4.18.2 Bases — RCS Isolated Loop Startup

The following TSTF-286 TS changes are <u>not</u> applicable to NUREG 1431 (Westinghouse plants) and are therefore not incorporated:

- Action 3.4.5.C — RCS Loops - MODE 3
- Action 3.4.5.C Bases — RCS Loops - MODE 3
- Action 3.9.2.A — Nuclear Instrumentation
- Action 3.9.2.A Bases — Nuclear Instrumentation
- Action 3.9.2.B Bases — Nuclear Instrumentation
- Action 3.3.9.B — Source Range Neutron Flux
- Action 3.3.9B Bases — Source Range Neutron Flux
- Action 3.3.10.B — Intermediate Range Neutron Flux
- Action 3.3.10.B Bases — Intermediate Range Neutron Flux
- LCO 3.9.4 — DHR and Coolant Circulation - High Water Level
- LCO 3.9.4 Bases — DHR and Coolant Circulation - High Water Level
- Action 3.9.4.A — DHR and Coolant Circulation - High Water Level
- Action 3.9.4.A Bases — DHR and Coolant Circulation - High Water Level
- Action 3.9.5.B — DHR and Coolant Circulation - Low Water Level
- Action 3.9.5.B Bases — DHR and Coolant Circulation - Low Water Level
- Action 3.3.8.A Bases — CRIS (Analog)
- Action 3.3.8.C — CRIS (Analog)
- Action 3.3.9.A Bases — CRIS (Digital)
- Action 3.3.9.C — CRIS (Digital)
- Action 3.3.13.A — [Logarithmic] Power Monitoring Channels (Analog)
- Action 3.3.13.A — [Logarithmic] Power Monitoring Channels (Digital)
- Action 3.3.13.A Bases — [Logarithmic] Power Monitoring Channels (Analog)
- Action 3.3.13.A Bases — [Logarithmic] Power Monitoring Channels (Digital)
- LCO 3.9.4 — SDC and Coolant Circulation - High Water Level
- LCO 3.9.4 Bases — SDC and Coolant Circulation - High Water Level
- Action 3.9.4.A — SDC and Coolant Circulation - High Water Level
- Action 3.9.4.A Bases — SDC and Coolant Circulation - High Water Level
- Action 3.9.5.B — SDC and Coolant Circulation - Low Water Level
- Action 3.9.5.B Bases — SDC and Coolant Circulation - Low Water Level

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