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### RS-01-049

March 21, 2001

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

> Dresden Nuclear Power Station, Units 2 and 3 Facility Operating License Nos. DPR-19 and DPR-25 NRC Docket Nos. 50-237 and 50-249

> LaSalle County Station, Units 1 and 2 Facility Operating License Nos. NPF-11 and NPF-18 NRC Docket Nos. 50-373 and 50-374

Quad Cities Nuclear Power Station, Units 1 and 2 Facility Operating License Nos. DPR-29 and DPR-30 NRC Docket Nos. 50-254 and 50-265

- Subject: Certification of Technical Specifications and Bases Supporting the Implementation of Improved Standard Technical Specifications for Dresden Nuclear Power Station, Units 2 and 3, LaSalle County Station, Units 1 and 2, and Quad Cities Nuclear Power Station, Units 1 and 2
- Reference: 1) Letter from R. M. Krich (Commonwealth Edison Company) to U.S. NRC, "Request for Technical Specifications Changes for Dresden Nuclear Power Station, Units 2 and 3, LaSalle County Station, Units 1 and 2, and Quad Cities Nuclear Power Station, Units 1 and 2, to Implement Improved Standard Technical Specifications," dated March 3, 2000
  - 2) Letter from R. M. Krich (Commonwealth Edison Company) to U.S. NRC, "Revision A to Request for Technical Specifications Changes for Dresden Nuclear Power Station, Units 2 and 3, LaSalle County Station, Units 1 and 2, and Quad Cities Nuclear Power Station, Units 1 and 2, to Implement Improved Standard Technical Specifications," dated June 5, 2000
  - 3) Letter from R. M. Krich (Commonwealth Edison Company) to U.S. NRC, "Revision B to Request for Technical Specifications Changes for Dresden Nuclear Power Station, Units 2 and 3, LaSalle County Station, Units 1 and 2, and Quad Cities Nuclear Power Station, Units 1 and 2, to Implement Improved Standard Technical Specifications," dated September 1, 2000

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- 4) Letter from R. M. Krich (Commonwealth Edison Company) to U.S. NRC, "Revision C to Request for Technical Specifications Changes for Dresden Nuclear Power Station, Units 2 and 3, LaSalle County Station, Units 1 and 2, and Quad Cities Nuclear Power Station, Units 1 and 2, to Implement Improved Standard Technical Specifications," dated December 18, 2000
- 5) Letter from R. M. Krich (Commonwealth Edison Company) to U.S. NRC, "Revision D to Request for Technical Specifications Changes for Dresden Nuclear Power Station, Units 2 and 3, LaSalle County Station, Units 1 and 2, and Quad Cities Nuclear Power Station, Units 1 and 2, to Implement Improved Standard Technical Specifications," dated February 15, 2001
- 6) Letter from R. M. Krich (Exelon Generation Company, LLC) to U.S. NRC, "Revision E to Request for Technical Specifications Changes and Proposed License Conditions Supporting the Implementation of Improved Standard Technical Specifications for Dresden Nuclear Power Station, Units 2 and 3, LaSalle County Station, Units 1 and 2, and Quad Cities Nuclear Power Station, Units 1 and 2," dated February 28, 2001

In Reference 1, in accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," Commonwealth Edison (ComEd) Company, now Exelon Generation Company (EGC), LLC, proposed to amend Appendix A, Technical Specifications (TS) of Facility Operating License Nos. DPR-19, DPR-25, NPF-11, NPF-18, DPR-29 and DPR-30 for Dresden Nuclear Power Station, Units 2 and 3, LaSalle County Station, Units 1 and 2, and Quad Cities Nuclear Power Station, Units 1 and 2, respectively. The proposed changes revise the Dresden Nuclear Power Station, Units 2 and 3, LaSalle County Station, Units 1 and 2, and Quad Cities Nuclear Power Station, Units 1 and 2, current Technical Specifications (CTS) to a format and content consistent with NUREG-1433, Revision 1, "Standard Technical Specifications for General Electric Plants, BWR 4," and NUREG-1434, Revision 1, "Standard Technical Specifications for Specifications for General Electric Plants, BWR 6," as applicable. References 2, 3, 4, 5, and 6 subsequently supplemented the proposed amendment.

This letter provides the NRC with a final certified complete set of Improved Technical Specifications (ITS) and Bases pages as initially provided in References 1, 2, 3, 4, 5, and 6. The ITS and Bases pages are the same as submitted by References 1, and as supplemented by References 2, 3, 4, 5, and 6, except for minor editorial and typographical corrections previously discussed with the NRC during phone conversations. In addition, we are providing the LaSalle County Station, Unit 1 TS pages necessary for implementation of Amendment 133, in ITS format. This amendment, which reduces the number of Safety/Relief Valves, is scheduled for implementation in the fall 2001 refueling outage. These pages are included as Attachment 4.

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Should you have any questions concerning this information, please contact Mr. J. V. Sipek at (630) 663-3741.

Respectfully,

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R. M. Krich Director-Licensing Mid-West Regional Operating Group

Attachments: Affidavit Attachment 1 – ITS and Bases Pages for the Dresden Nuclear Power Station Attachment 2 – ITS and Bases Pages for the LaSalle County Station Attachment 3 – ITS and Bases Pages for the Quad Cities Nuclear Power Station Attachment 4 – LaSalle County Station, Unit 1, Amendment 133 Pages in ITS Format

 cc: Regional Administrator - NRC Region III NRC Senior Resident Inspector - Dresden Nuclear Power Station w/o Attachments 2, 3, and 4
 NRC Senior Resident Inspector - LaSalle County Station w/o Attachments 1 and 3
 NRC Senior Resident Inspector - Quad Cities Nuclear Power Station w/o Attachments 1, 2, and 4
 Office of Nuclear Facility Safety - Illinois Department of Nuclear Safety

STATE OF ILLINOIS )	)	
COUNTY OF DUPAGE	)	
IN THE MATTER OF	)	
COMMONWEALTH EDISON (COMED) COMPANY	)	Docket Nos.
DRESDEN NUCLEAR POWER STATION - UNITS 2 and 3 )	)	50- 237 and 50-249
LASALLE COUNTY STATION - UNITS 1 and 2	)	50- 373 and 50-374
QUAD CITIES NUCLEAR POWER STATION - UNITS 1 and 2)		50- 254 and 50-265

SUBJECT: Certification of Technical Specifications and Bases Supporting the Implementation of Improved Standard Technical Specifications for Dresden Nuclear Power Station, Units 2 and 3, LaSalle County Station, Units 1 and 2, and Quad Cities Nuclear Power Station, Units 1 and 2

# AFFIDAVIT

I affirm that the content of this transmittal is true and correct to the best of my knowledge, information and belief.

R. M. Krich **//** Director, Licensing Mid-West Regional Operating Group

Subscribed and sworn to before me, a Notary Public in and

for the State above named, this \_\_\_\_\_ day of

March , 2001.

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. OFFICIAL SEAL . Timothy A. Byam Notary Public, State of Illinois My Commission Expires 11/24/2001

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# ATTACHMENT 1

ITS and Bases Pages for the Dresden Nuclear Power Station

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### 1.0 USE AND APPLICATION

### 1.1 Definitions

-----NOTE-----NOTE-----The defined terms of this section appear in capitalized type and are applicable throughout these Technical Specifications and Bases. \_\_\_\_\_ -----Definition Term ACTIONS shall be that part of a Specification that ACTIONS prescribes Required Actions to be taken under designated Conditions within specified Completion Times. The APLHGR shall be applicable to a specific AVERAGE PLANAR LINEAR planar height and is equal to the sum of the HEAT GENERATION RATE LHGRs for all the fuel rods in the specified (APLHGR) bundle at the specified height divided by the number of fuel rods in the fuel bundle at the height. A CHANNEL CALIBRATION shall be the adjustment, as CHANNEL CALIBRATION necessary, of the channel output such that it responds within the necessary range and accuracy to known values of the parameter that the channel monitors. The CHANNEL CALIBRATION shall encompass all devices in the channel required for channel OPERABILITY and the CHANNEL FUNCTIONAL TEST. Calibration of instrument channels with resistance temperature detector (RTD) or thermocouple sensors may consist of an inplace qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel. The CHANNEL CALIBRATION may be performed by means of any series of sequential, overlapping, or total channel steps. A CHANNEL CHECK shall be the qualitative CHANNEL CHECK assessment, by observation, of channel behavior during operation. This determination shall include, where possible, comparison of the channel indication and status to other indications or status derived from independent instrument channels measuring the same parameter.

(continued)

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# 1.1 Definitions (continued)

CHANNEL FUNCTIONAL TEST	A CHANNEL FUNCTIONAL TEST shall be the injection of a simulated or actual signal into the channel as close to the sensor as practicable to verify OPERABILITY of all devices in the channel required for channel OPERABILITY. The CHANNEL FUNCTIONAL TEST may be performed by means of any series of sequential, overlapping, or total channel steps.	
CORE ALTERATION	CORE ALTERATION shall be the movement of any fuel, sources, or reactivity control components, within the reactor vessel with the vessel head removed and fuel in the vessel. The following exceptions are not considered to be CORE ALTERATIONS:	
	<ul> <li>Movement of source range monitors, local power range monitors, intermediate range monitors, traversing incore probes, or special movable detectors (including undervessel replacement); and</li> </ul>	
	b. Control rod movement, provided there are no fuel assemblies in the associated core cell.	
	Suspension of CORE ALTERATIONS shall not preclude completion of movement of a component to a safe position.	
CORE OPERATING LIMITS REPORT (COLR)	The COLR is the unit specific document that provides cycle specific parameter limits for the current reload cycle. These cycle specific limits shall be determined for each reload cycle in accordance with Specification 5.6.5. Plant operation within these limits is addressed in individual Specifications.	
DOSE EQUIVALENT I-131	DOSE EQUIVALENT I-131 shall be that concentration of I-131 (microcuries/gram) that alone would produce the same thyroid dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134, and I-135 actually present. The thyroid dose	
	(continued)	

# 1.1 Definitions

	DOSE EQUIVALENT I-131 (continued)	be 1 AEC Powe Regu 30,	version factors used for this calculation shall chose listed in Table III of TID-14844, 1962, "Calculation of Distance Factors for er and Test Reactor Sites;" Table E-7 of alatory Guide 1.109, Rev. 1, NRC, 1977; or ICRP Supplement to Part 1, pages 192-212, Table led, "Committed Dose Equivalent in Target ans or Tissues per Intake of Unit Activity."
•	FUEL DESIGN LIMITING RATIO FOR CENTERLINE MELT (FDLRC)	a n'	FDLRC shall be 1.2 times the LHGR existing at iven location divided by the product of the nsient LHGR limit and the fraction of RTP.
	LEAKAGE	LEA	KAGE shall be:
		a.	Identified LEAKAGE
			<ol> <li>LEAKAGE into the drywell, such as that from pump seals or valve packing, that is captured and conducted to a sump or collecting tank; or</li> </ol>
			<ol> <li>LEAKAGE into the drywell atmosphere from sources that are both specifically located and known either not to interfere with the operation of leakage detection systems or not to be pressure boundary LEAKAGE;</li> </ol>
		b.	<u>Unidentified LEAKAGE</u>
			All LEAKAGE into the drywell that is not identified LEAKAGE;
		с.	<u>Total LEAKAGE</u>
			Sum of the identified and unidentified LEAKAGE; and
		d.	Pressure Boundary LEAKAGE
			LEAKAGE through a nonisolable fault in a Reactor Coolant System (RCS) component body, pipe wall, or vessel wall.

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1.1 Definitions (continued)

LINEAR HEAT GENERATION RATE (LHGR)	The LHGR shall be the heat generation rate per unit length of fuel rod. It is the integral of the heat flux over the heat transfer area associated with the unit length.
LOGIC SYSTEM FUNCTIONAL TEST	A LOGIC SYSTEM FUNCTIONAL TEST shall be a test of all logic components required for OPERABILITY of a logic circuit, from as close to the sensor as practicable up to, but not including, the actuated device, to verify OPERABILITY. The LOGIC SYSTEM FUNCTIONAL TEST may be performed by means of any series of sequential, overlapping, or total system steps so that the entire logic system is tested.
MINIMUM CRITICAL POWER RATIO (MCPR)	The MCPR shall be the smallest critical power ratio (CPR) that exists in the core for each class of fuel. The CPR is that power in the assembly that is calculated by application of the appropriate correlation(s) to cause some point in the assembly to experience boiling transition, divided by the actual assembly operating power.
MODE	A MODE shall correspond to any one inclusive combination of mode switch position, average reactor coolant temperature, and reactor vessel head closure bolt tensioning specified in Table 1.1–1 with fuel in the reactor vessel.
OPERABLE — OPERABILITY	A system, subsystem, division, component, or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified safety function(s) and when all necessary attendant instrumentation, controls, normal or emergency electrical power, cooling and seal water, lubrication, and other auxiliary equipment that are required for the system, subsystem, division, component, or device to perform its specified safety function(s) are also capable of performing their related support function(s).
RATED THERMAL POWER (RTP)	RTP shall be a total reactor core heat transfer rate to the reactor coolant of 2527 MWt.

1.1 Definitions (continued)

REACTOR PROTECTION SYSTEM (RPS) RESPONSE TIME	The RPS RESPONSE TIME shall be that time interval from the opening of the sensor contact until the opening of the trip actuator. The response time may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured.	
SHUTDOWN MARGIN (SDM)	SDM shall be the amount of reactivity by which th reactor is subcritical or would be subcritical assuming that:	
	a. The reactor is xenon free;	
	b. The moderator temperature is 68°F; and	
	c. All control rods are fully inserted except for the single control rod of highest reactivity worth, which is assumed to be fully withdrawn.	
	With control rods not capable of being fully inserted, the reactivity worth of these control rods must be accounted for in the determination of SDM.	
STAGGERED TEST BASIS	A STAGGERED TEST BASIS shall consist of the testing of one of the systems, subsystems, channels, or other designated components during the interval specified by the Surveillance Frequency, so that all systems, subsystems, channels, or other designated components are tested during <i>n</i> Surveillance Frequency intervals, where <i>n</i> is the total number of systems, subsystems, channels, or other designated components in the associated function.	
THERMAL POWER	THERMAL POWER shall be the total reactor core heat transfer rate to the reactor coolant.	
TURBINE BYPASS SYSTEM RESPONSE TIME	The TURBINE BYPASS SYSTEM RESPONSE TIME shall be that time interval from when the turbine bypass control unit generates a turbine bypass valve flow signal until the turbine bypass valves travel to their required positions. The response time may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured.	

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MODE	TITLE	REACTOR MODE SWITCH POSITION	AVERAGE REACTOR COOLANT TEMPERATURE (°F)
1 2	Power Operation Startup	Run Refuel <sup>(a)</sup> or Startup/Hot Standby	NA NA
3	Hot Shutdown <sup>(a)</sup>	Shutdown	> 212
4	Cold Shutdown <sup>(a)</sup>	Shutdown	<u>&lt;</u> 212
5	Refueling <sup>(b)</sup>	Shutdown or Refuel	NA

# Table 1.1-1 (page 1 of 1) MODES

(a) All reactor vessel head closure bolts fully tensioned.

(b) One or more reactor vessel head closure bolts less than fully tensioned.

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### 1.0 USE AND APPLICATION

#### 1.2 Logical Connectors

PURPOSE The purpose of this section is to explain the meaning of logical connectors.

Logical connectors are used in Technical Specifications (TS) to discriminate between, and yet connect, discrete Conditions, Required Actions, Completion Times, Surveillances, and Frequencies. The only logical connectors that appear in TS are <u>AND</u> and <u>OR</u>. The physical arrangement of these connectors constitutes logical conventions with specific meanings.

BACKGROUND Several levels of logic may be used to state Required Actions. These levels are identified by the placement (or nesting) of the logical connectors and by the number assigned to each Required Action. The first level of logic is identified by the first digit of the number assigned to a Required Action and the placement of the logical connector in the first level of nesting (i.e., left justified with the number of the Required Action). The successive levels of logic are identified by additional digits of the Required Action number and by successive indentions of the logical connectors.

> When logical connectors are used to state a Condition, Completion Time, Surveillance, or Frequency, only the first level of logic is used, and the logical connector is left justified with the statement of the Condition, Completion Time, Surveillance, or Frequency.

EXAMPLES The following examples illustrate the use of logical connectors.

# 1.2 Logical Connectors

EXAMPLES (continued)	EXAMPLE 1.2-1 ACTIONS					
	CONDITION	REQUIRED ACTION	COMPLETION TIME			
	A. LCO not met.	A.1 Verify <u>AND</u>				
		A.2 Restore				

In this example the logical connector <u>AND</u> is used to indicate that, when in Condition A, both Required Actions A.1 and A.2 must be completed.

# 1.2 Logical Connectors

EXAMPLES	<u>EXAMPLE</u>	1.2-2
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(continued)

ACTIONS			
CONDITION	REQUIRED ACTION	COMPLETION TIME	
A. LCO not met.	A.1 Trip <u>OR</u>		
	A.2.1 Verify AND		
	 A.2.2.1 Reduce <u>OR</u>		
	A.2.2.2 Perform		
	<u>OR</u> A.3 Align		

This example represents a more complicated use of logical connectors. Required Actions A.1, A.2, and A.3 are alternative choices, only one of which must be performed as indicated by the use of the logical connector  $\underline{OR}$  and the left justified placement. Any one of these three Actions may be chosen. If A.2 is chosen, then both A.2.1 and A.2.2 must be performed as indicated by the logical connector <u>AND</u>. Required Action A.2.2 is met by performing A.2.2.1 or A.2.2.2. The indented position of the logical connector <u>OR</u> indicates that A.2.2.1 and A.2.2 are alternative choices, only one of which must be performed.

#### 1.0 USE AND APPLICATION

# 1.3 Completion Times

PURPOSE	The purpose of this section is to establish the Completion Time convention and to provide guidance for its use.	
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- BACKGROUND Limiting Conditions for Operation (LCOs) specify minimum requirements for ensuring safe operation of the unit. The ACTIONS associated with an LCO state Conditions that typically describe the ways in which the requirements of the LCO can fail to be met. Specified with each stated Condition are Required Action(s) and Completion Time(s).
- DESCRIPTION The Completion Time is the amount of time allowed for completing a Required Action. It is referenced to the time of discovery of a situation (e.g., inoperable equipment or variable not within limits) that requires entering an ACTIONS Condition unless otherwise specified, providing the unit is in a MODE or specified condition stated in the Applicability of the LCO. Required Actions must be completed prior to the expiration of the specified Completion Time. An ACTIONS Condition remains in effect and the Required Actions apply until the Condition no longer exists or the unit is not within the LCO Applicability.

If situations are discovered that require entry into more than one Condition at a time within a single LCO (multiple Conditions), the Required Actions for each Condition must be performed within the associated Completion Time. When in multiple Conditions, separate Completion Times are tracked for each Condition starting from the time of discovery of the situation that required entry into the Condition.

Once a Condition has been entered, subsequent divisions, subsystems, components, or variables expressed in the Condition, discovered to be inoperable or not within limits, will <u>not</u> result in separate entry into the Condition unless specifically stated. The Required Actions of the Condition continue to apply to each additional failure, with Completion Times based on initial entry into the Condition.

DESCRIPTION (continued)	However, when a <u>subsequent</u> division, subsystem, component, or variable expressed in the Condition is discovered to be inoperable or not within limits, the Completion Time(s) may be extended. To apply this Completion Time extension, two criteria must first be met. The subsequent inoperability:
	a. Must exist concurrent with the <u>first</u> inoperability; and
	b. Must remain inoperable or not within limits after the first inoperability is resolved.
	The total Completion Time allowed for completing a Required Action to address the subsequent inoperability shall be limited to the more restrictive of either:
	a. The stated Completion Time, as measured from the initial entry into the Condition, plus an additional 24 hours; or
	b. The stated Completion Time as measured from discovery of the subsequent inoperability.
	The above Completion Time extension does not apply to those Specifications that have exceptions that allow completely separate re-entry into the Condition (for each division, subsystem, component or variable expressed in the Condition) and separate tracking of Completion Times based on this re-entry. These exceptions are stated in individual Specifications.
	The above Completion Time extension does not apply to a Completion Time with a modified "time zero." This modified "time zero" may be expressed as a repetitive time (i.e., "once per 8 hours," where the Completion Time is referenced from a previous completion of the Required Action versus the time of Condition entry) or as a time modified by the phrase "from discovery" Example 1.3-3 illustrates one use of this type of Completion Time. The 10 day Completion Time specified for Condition A and B in Example 1.3-3 may not be extended.
EXAMPLES	The following examples illustrate the use of Completion Times with different types of Conditions and changing Conditions.

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(continued)

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EXAMPLE 1.3-1

(continued)

ACTIONS					
CONDITION	REQUIRED ACTION	COMPLETION TIME			
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3. <u>AND</u> B.2 Be in MODE 4.	12 hours 36 hours			

Condition B has two Required Actions. Each Required Action has its own separate Completion Time. Each Completion Time is referenced to the time that Condition B is entered.

The Required Actions of Condition B are to be in MODE 3 within 12 hours <u>AND</u> in MODE 4 within 36 hours. A total of 12 hours is allowed for reaching MODE 3 and a total of 36 hours (not 48 hours) is allowed for reaching MODE 4 from the time that Condition B was entered. If MODE 3 is reached within 6 hours, the time allowed for reaching MODE 4 is the next 30 hours because the total time allowed for reaching MODE 4 is 36 hours.

If Condition B is entered while in MODE 3, the time allowed for reaching MODE 4 is the next 36 hours.

EXAMPLE 1.3-2

(continued)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME	
A. One pump inoperable.	A.1 Restore pump to OPERABLE status.	7 days	
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3. <u>AND</u> B.2 Be in MODE 4.	12 hours 36 hours	

When a pump is declared inoperable, Condition A is entered. If the pump is not restored to OPERABLE status within 7 days, Condition B is also entered and the Completion Time clocks for Required Actions B.1 and B.2 start. If the inoperable pump is restored to OPERABLE status after Condition B is entered, Conditions A and B are exited, and therefore, the Required Actions of Condition B may be terminated.

When a second pump is declared inoperable while the first pump is still inoperable, Condition A is not re-entered for the second pump. LCO 3.0.3 is entered, since the ACTIONS do not include a Condition for more than one inoperable pump. The Completion Time clock for Condition A does not stop after LCO 3.0.3 is entered, but continues to be tracked from the time Condition A was initially entered.

While in LCO 3.0.3, if one of the inoperable pumps is restored to OPERABLE status and the Completion Time for Condition A has not expired, LCO 3.0.3 may be exited and operation continued in accordance with Condition A.

EXAMP	LES
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#### EXAMPLE 1.3-2 (continued)

While in LCO 3.0.3, if one of the inoperable pumps is restored to OPERABLE status and the Completion Time for Condition A has expired, LCO 3.0.3 may be exited and operation continued in accordance with Condition B. The Completion Time for Condition B is tracked from the time the Condition A Completion Time expired.

On restoring one of the pumps to OPERABLE status, the Condition A Completion Time is not reset, but continues from the time the first pump was declared inoperable. This Completion Time may be extended if the pump restored to OPERABLE status was the first inoperable pump. A 24 hour extension to the stated 7 days is allowed, provided this does not result in the second pump being inoperable for > 7 days.

EXAMPLES	EXAMPLE 1.3-3		
(continued)	ACTIONS		
	CONDITION	REQUIRED ACTION	COMPLETION TIME
	A. One Function X subsystem inoperable.	A.1 Restore Function X subsystem to OPERABLE status.	7 days <u>AND</u> 10 days from discovery of failure to meet the LCO
	B. One Function Y subsystem inoperable.	B.1 Restore Function Y subsystem to OPERABLE status.	72 hours <u>AND</u> 10 days from discovery of failure to meet the LCO
	C. One Function X subsystem inoperable.	C.1 Restore Function X subsystem to OPERABLE status.	72 hours
	<u>AND</u> One Function Y subsystem inoperable.	OR C.2 Restore Function Y subsystem to OPERABLE status.	72 hours

(continued)

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EXAMPLES

#### EXAMPLE 1.3-3 (continued)

When one Function X subsystem and one Function Y subsystem are inoperable, Condition A and Condition B are concurrently applicable. The Completion Times for Condition A and Condition B are tracked separately for each subsystem, starting from the time each subsystem was declared inoperable and the Condition was entered. A separate Completion Time is established for Condition C and tracked from the time the second subsystem was declared inoperable (i.e., the time the situation described in Condition C was discovered).

If Required Action C.2 is completed within the specified Completion Time, Conditions B and C are exited. If the Completion Time for Required Action A.1 has not expired, operation may continue in accordance with Condition A. The remaining Completion Time in Condition A is measured from the time the affected subsystem was declared inoperable (i.e., initial entry into Condition A).

The Completion Times of Conditions A and B are modified by a logical connector, with a separate 10 day Completion Time measured from the time it was discovered the LCO was not met. In this example, without the separate Completion Time, it would be possible to alternate between Conditions A, B, and C in such a manner that operation could continue indefinitely without ever restoring systems to meet the LCO. The separate Completion Time modified by the phrase "from discovery of failure to meet the LCO" is designed to prevent indefinite continued operation while not meeting the LCO. This Completion Time allows for an exception to the normal "time zero" for beginning the Completion Time "time zero" is specified as commencing at the time the LCO was initially not met, instead of at the time the associated Condition was entered.

(continued)

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EXAMPLES	EXAMPLE 1.3-4 ACTIONS				
(continued)					
		CONDITION	F	REQUIRED ACTION	COMPLETION TIME
	Α.	One or more valves inoperable.	A.1	Restore valve(s) to OPERABLE status.	4 hours
	Β.	Required Action and associated Completion Time not met.	AND	Be in MODE 3. Be in MODE 4.	12 hours 36 hours

A single Completion Time is used for any number of valves inoperable at the same time. The Completion Time associated with Condition A is based on the initial entry into Condition A and is not tracked on a per valve basis. Declaring subsequent valves inoperable, while Condition A is still in effect, does not trigger the tracking of separate Completion Times.

Once one of the valves has been restored to OPERABLE status, the Condition A Completion Time is not reset, but continues from the time the first valve was declared inoperable. The Completion Time may be extended if the valve restored to OPERABLE status was the first inoperable valve. The Condition A Completion Time may be extended for up to 4 hours provided this does not result in any subsequent valve being inoperable for > 4 hours.

If the Completion Time of 4 hours (plus the extension) expires while one or more valves are still inoperable, Condition B is entered.

(continued)

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EXAMPLE (continued)	EXAMPLE 1.3-5 ACTIONS Separate Condition entry is allowed for each inoperable valve.				
	CONDITION	REQUIRED ACTION	COMPLETION TIME		
	A. One or more valves inoperable.	A.1 Restore valve to OPERABLE status.	4 hours		

AND

B. Required Action and

> associated Completion

Time not met.

The Note above the ACTIONS Table is a method of modifying how the Completion Time is tracked. If this method of modifying how the Completion Time is tracked was applicable only to a specific Condition, the Note would appear in that Condition rather than at the top of the ACTIONS Table.

B.1 Be in MODE 3.

B.2 Be in MODE 4.

The Note allows Condition A to be entered separately for each inoperable valve, and Completion Times tracked on a per valve basis. When a valve is declared inoperable, Condition A is entered and its Completion Time starts. If subsequent valves are declared inoperable, Condition A is entered for each valve and separate Completion Times start and are tracked for each valve.

(continued)

12 hours

36 hours

#### FXAMPLES EXAMPLE 1.3-5 (continued)

If the Completion Time associated with a valve in Condition A expires, Condition B is entered for that valve. If the Completion Times associated with subsequent valves in Condition A expire, Condition B is entered separately for each valve and separate Completion Times start and are tracked for each valve. If a valve that caused entry into Condition B is restored to OPERABLE status, Condition B is exited for that valve.

Since the Note in this example allows multiple Condition entry and tracking of separate Completion Times, Completion Time extensions do not apply.

#### EXAMPLE 1.3-6

ACTIONS	A	CT	Ι	01	١S
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CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One channel inoperable.	<pre>A.1 Perform    SR 3.x.x.x. OR A.2 Reduce THERMAL    POWER to</pre>	Once per 8 hours 8 hours
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	12 hours

(continued)

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# EXAMPLES <u>EXAMPLE 1.3-6</u> (continued)

Entry into Condition A offers a choice between Required Action A.1 or A.2. Required Action A.1 has a "once per" Completion Time, which qualifies for the 25% extension, per SR 3.0.2, to each performance after the initial performance. The initial 8 hour interval of Required Action A.1 begins when Condition A is entered and the initial performance of Required Action A.1 must be completed within the first 8 hour interval. If Required Action A.1 is followed and the Required Action is not met within the Completion Time (plus the extension allowed by SR 3.0.2), Condition B is entered. If Required Action A.2 is followed and the Completion Time of 8 hours is not met, Condition B is entered.

If after entry into Condition B, Required Action A.1 or A.2 is met, Condition B is exited and operation may then continue in Condition A.

EXAMPLES (continued)	EXAMPLE 1.3-7							
	ACTIONS CONDITI	ION REQUIRED ACTION	COMPLETION TIME					
	A. One subsyst inopera		1 hour <u>AND</u> Once per 8 hours thereafter 72 hours					
	B. Require Action associa Complet Time no met.	and ated <u>AND</u> tion	12 hours 36 hours					

Required Action A.1 has two Completion Times. The 1 hour Completion Time begins at the time the Condition is entered and each "Once per 8 hours thereafter" interval begins upon performance of Required Action A.1.

If after Condition A is entered, Required Action A.1 is not met within either the initial 1 hour or any subsequent 8 hour interval from the previous performance (plus the extension allowed by SR 3.0.2), Condition B is entered. The Completion Time clock for Condition A does not stop after Condition B is entered, but continues from the time Condition A was initially entered. If Required Action A.1

EXAMPLES	EXAMPLE 1.3-7 (continued)
	is met after Condition B is entered, Condition B is exited and operation may continue in accordance with Condition A, provided the Completion Time for Required Action A.2 has not expired.
IMMEDIATE COMPLETION TIME	When "Immediately" is used as a Completion Time, the Required Action should be pursued without delay and in a controlled manner.

#### 1.0 USE AND APPLICATION

#### 1.4 Frequency

PURPOSE	The purpose	of	this section	is to	define	the	proper	use	and
	application	of	Frequency red	quirem	ents.				

DESCRIPTION Each Surveillance Requirement (SR) has a specified Frequency in which the Surveillance must be met in order to meet the associated Limiting Condition for Operation (LCO). An understanding of the correct application of the specified Frequency is necessary for compliance with the SR.

> The "specified Frequency" is referred to throughout this section and each of the Specifications of Section 3.0, Surveillance Requirement (SR) Applicability. The "specified Frequency" consists of the requirements of the Frequency column of each SR, as well as certain Notes in the Surveillance column that modify performance requirements.

Sometimes special situations dictate when the requirements of a Surveillance are to be met. They are "otherwise stated" conditions allowed by SR 3.0.1. They may be stated as clarifying Notes in the Surveillance, as part of the Surveillance, or both. Example 1.4-4 discusses these special situations.

Situations where a Surveillance could be required (i.e., its Frequency could expire), but where it is not possible or not desired that it be performed until sometime after the associated LCO is within its Applicability, represent potential SR 3.0.4 conflicts. To avoid these conflicts, the SR (i.e., the Surveillance or the Frequency) is stated such that it is only "required" when it can be and should be performed. With an SR satisfied, SR 3.0.4 imposes no restriction.

The use of "met" or "performed" in these instances conveys specific meanings. A Surveillance is "met" only when the acceptance criteria are satisfied. Known failure of the requirements of a Surveillance, even without a Surveillance specifically being "performed," constitutes a Surveillance not "met." "Performance" refers only to the requirement to specifically determine the ability to meet the acceptance criteria. SR 3.0.4 restrictions would not apply if both the following conditions are satisfied:

(continued)

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DESCRIPTION	a.	The Surveillance is not required to be performed; and
(continued)		The Surveillance is not required to be met or, even if required to be met, is not known to be failed.

EXAMPLES The following examples illustrate the various ways that Frequencies are specified. In these examples, the Applicability of the LCO (LCO not shown) is MODES 1, 2, and 3.

EXAMPLE 1.4-1

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
Perform CHANNEL CHECK.	12 hours

Example 1.4-1 contains the type of SR most often encountered in the Technical Specifications (TS). The Frequency specifies an interval (12 hours) during which the associated Surveillance must be performed at least one time. Performance of the Surveillance initiates the subsequent interval. Although the Frequency is stated as 12 hours, an extension of the time interval to 1.25 times the interval specified in the Frequency is allowed by SR 3.0.2 for operational flexibility. The measurement of this interval continues at all times, even when the SR is not required to be met per SR 3.0.1 (such as when the equipment is inoperable, a variable is outside specified limits, or the unit is outside the Applicability of the LCO). If the interval specified by SR 3.0.2 is exceeded while the unit is in a MODE or other specified condition in the Applicability of the LCO, and the performance of the Surveillance is not otherwise modified (refer to Examples 1.4-3 and 1.4-4), then SR 3.0.3 becomes applicable.

If the interval as specified by SR 3.0.2 is exceeded while the unit is not in a MODE or other specified condition in the Applicability of the LCO for which performance of the SR

(continued)

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EXAMPLES <u>EXAMPLE 1.4-1</u> (continued)

is required, the Surveillance must be performed within the Frequency requirements of SR 3.0.2 prior to entry into the MODE or other specified condition. Failure to do so would result in a violation of SR 3.0.4.

#### EXAMPLE 1.4-2

#### SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY	
Verify flow is within limits.	Once within 12 hours after ≥ 25% RTP	
	AND	
	24 hours thereafter	

Example 1.4-2 has two Frequencies. The first is a one time performance Frequency, and the second is of the type shown in Example 1.4-1. The logical connector "AND" indicates that both Frequency requirements must be met. Each time reactor power is increased from a power level < 25% RTP to  $\geq$  25% RTP, the Surveillance must be performed within 12 hours.

The use of "once" indicates a single performance will satisfy the specified Frequency (assuming no other Frequencies are connected by "<u>AND</u>"). This type of Frequency does not qualify for the extension allowed by SR 3.0.2.

"Thereafter" indicates future performances must be established per SR 3.0.2, but only after a specified condition is first met (i.e., the "once" performance in this example). If reactor power decreases to < 25% RTP, the measurement of both intervals stops. New intervals start upon reactor power reaching 25% RTP.

(continued)

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EXAMPLES (continued)	EXAMPLE 1.4-3						
	SURVEILLANCE REQUIREMENTS						
	SURVEILLANCE	FREQUENCY					
	Not required to be performed until 12 hours after ≥ 25% RTP.						
	Perform channel adjustment.	7 days					

The interval continues whether or not the unit operation is < 25% RTP between performances.

As the Note modifies the required <u>performance</u> of the Surveillance, it is construed to be part of the "specified Frequency." Should the 7 day interval be exceeded while operation is < 25% RTP, this Note allows 12 hours after power reaches  $\geq$  25% RTP to perform the Surveillance. The Surveillance is still considered to be within the "specified Frequency." Therefore, if the Surveillance were not performed within the 7 day interval (plus the extension allowed by SR 3.0.2), but operation was < 25% RTP, it would not constitute a failure of the SR or failure to meet the LCO. Also, no violation of SR 3.0.4 occurs when changing MODES, even with the 7 day Frequency not met, provided operation does not exceed 12 hours with power  $\geq$  25% RTP.

Once the unit reaches 25% RTP, 12 hours would be allowed for completing the Surveillance. If the Surveillance were not performed within this 12 hour interval, there would then be a failure to perform a Surveillance within the specified Frequency, and the provisions of SR 3.0.3 would apply.

EXAMPLES (continued)	EXAMPLE 1.4-4 SURVEILLANCE REQUIREMENTS				
	SURVEILLANCE	FREQUENCY			
	Only required to be met in MODE 1.				
	Verify leakage rates are within limits.	24 hours			

Example 1.4-4 specifies that the requirements of this Surveillance do not have to be met until the unit is in MODE 1. The interval measurement for the Frequency of this Surveillance continues at all times, as described in Example 1.4-1. However, the Note constitutes an "otherwise stated" exception to the Applicability of this Surveillance. Therefore, if the Surveillance were not performed within the 24 hour interval (plus the extension allowed by SR 3.0.2), but the unit was not in MODE 1, there would be no failure of the SR nor failure to meet the LCO. Therefore, no violation of SR 3.0.4 occurs when changing MODES, even with the 24 hour Frequency exceeded, provided the MODE change was not made into MODE 1. Prior to entering MODE 1 (assuming again that the 24 hour Frequency were not met), SR 3.0.4 would require satisfying the SR.

#### 2.0 SAFETY LIMITS (SLs)

#### 2.1 SLs

- 2.1.1 Reactor Core SLs
  - 2.1.1.1 With the reactor steam dome pressure < 785 psig or core flow < 10% rated core flow:

THERMAL POWER shall be  $\leq$  25% RTP.

2.1.1.2 With the reactor steam dome pressure  $\geq$  785 psig and core flow  $\geq$  10% rated core flow:

For Unit 2 two recirculation loop operation, MCPR shall be  $\geq 1.09$  for cycle exposures  $\leq 13,800$  MWd/MTU, and  $\geq 1.12$  for cycle exposures > 13,800 MWd/MTU, or for Unit 2 single recirculation loop operation, MCPR shall be  $\geq 1.10$  for cycle exposures  $\leq 13,800$  MWd/MTU and  $\geq 1.13$ for cycle exposures > 13,800 MWd/MTU.

For Unit 3 two recirculation loop operation, MCPR shall be  $\geq$  1.10, or for single recirculation loop operation, MCPR shall be  $\geq$  1.11.

- 2.1.1.3 Reactor vessel water level shall be greater than the top of active irradiated fuel.
- 2.1.2 Reactor Coolant System Pressure SL

Reactor steam dome pressure shall be  $\leq$  1345 psig.

#### 2.2 SL Violations

With any SL violation, the following actions shall be completed within 2 hours:

- 2.2.1 Restore compliance with all SLs; and
- 2.2.2 Insert all insertable control rods.

SLS

## 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

- LCO 3.0.1 LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2 and LCO 3.0.7.
- LCO 3.0.2 Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6.

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.

- LCO 3.0.3 When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:
  - a. MODE 3 within 13 hours; and
  - b. MODE 4 within 37 hours.

Exceptions to this Specification are stated in the individual Specifications.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

LCO 3.0.3 is only applicable in MODES 1, 2, and 3.

LCO 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time. This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

(continued)

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### 3.0 LCO APPLICABILITY

LCO 3.0.4 (continued)	Exceptions to this Specification are stated in the individual Specifications.
	LCO 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3.
	Equipment nemoved from service or declared inoperable to

LCO 3.0.5 Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

LCO 3.0.6 When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, an evaluation shall be performed in accordance with Specification 5.5.11, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

LCO 3.0.7 Special Operations LCOs in Section 3.10 allow specified Technical Specifications (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Special Operations LCOs is optional. When a Special Operations LCO is desired to be met but is not met, the ACTIONS of the Special Operations

### 3.0 LCO APPLICABILITY

LCO 3.0.7 (continued)	LCO shall be met. When a Special Operations LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with the other applicable Specifications.
LCO 3.0.8	LCOs, including associated ACTIONS, shall apply to each unit individually, unless otherwise indicated. Whenever the LCO refers to a system or component that is shared by both units, the ACTIONS will apply to both units simultaneously.

# 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

- SR 3.0.1 SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.
- SR 3.0.2 The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.

For Frequencies specified as "once," the above interval extension does not apply.

If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is less. This delay period is permitted to allow performance of the Surveillance.

> If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

#### 3.0 SR APPLICABILITY (continued)

SR 3.0.4 Entry into a MODE or other specified condition in the Applicability of an LCO shall not be made unless the LCO's Surveillances have been met within their specified Frequency. This provision shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with Actions or that are part of a shutdown of the unit.

SR 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3.

SR 3.0.5 SRs shall apply to each unit individually, unless otherwise indicated.

### 3.1 REACTIVITY CONTROL SYSTEMS

### 3.1.1 SHUTDOWN MARGIN (SDM)

- LCO 3.1.1 SDM shall be:
  - a.  $\geq$  0.38%  $\Delta k/k,$  with the highest worth control rod analytically determined; or
  - b.  $\geq$  0.28%  $\Delta k/k$  , with the highest worth control rod determined by test.

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APPLICABILITY: MODES 1, 2, 3, 4, and 5.

ACTIONS	AC	ΤI	01	١S
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	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	SDM not within limits in MODE 1 or 2.	A.1	Restore SDM to within limits.	6 hours
Β.	Required Action and associated Completion Time of Condition A not met.	B.1	Be in MODE 3.	12 hours
с.	SDM not within limits in MODE 3.	C.1	Initiate action to fully insert all insertable control rods.	Immediately
D.	SDM not within limits in MODE 4.	D.1	Initiate action to fully insert all insertable control rods.	Immediately
		<u>AND</u>		
			:	(continued)

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SDM 3.1.1

ACTIONS
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	CONDITION		REQUIRED ACTION	COMPLETION TIME
D.	(continued)	D.2	Initiate action to restore secondary containment to OPERABLE status.	l hour
		<u>and</u>		
		D.3	Initiate action to restore one standby gas treatment (SGT) subsystem to OPERABLE status.	1 hour
		AND		
		D.4	Initiate action to restore isolation capability in each required secondary containment penetration flow path not isolated.	1 hour
Ε.	SDM not within limits in MODE 5.	E.1	Suspend CORE ALTERATIONS except for control rod insertion and fuel assembly removal.	Immediately
		AND		
		E.2	Initiate action to fully insert all insertable control rods in core cells containing one or more fuel assemblies.	Immediately
		<u>and</u>		
				(continued)

SDM 3.1.1 •

# ACTIONS

CONDITION		REQUIRED ACTION	COMPLETION TIME
E. (continued)	E.3	Initiate action to restore secondary containment to OPERABLE status.	l hour
	<u>and</u>		
	E.4	Initiate action to restore one SGT subsystem to OPERABLE status.	1 hour
	AND		
	E.5	Initiate action to restore isolation capability in each required secondary containment penetration flow path not isolated.	1 hour

SURVEILLANCE REQUIREMENTS

	FREQUENCY	
SR 3.1.1.1	<ul> <li>Verify SDM is:</li> <li>a. ≥ 0.38% Δk/k with the highest worth control rod analytically determined; or</li> <li>b. ≥ 0.28% Δk/k with the highest worth control rod determined by test.</li> </ul>	Prior to each in vessel fuel movement during fuel loading sequence <u>AND</u> Once within 4 hours after criticality following fuel movement within the reactor pressure vessel or control rod replacement

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# 3.1 REACTIVITY CONTROL SYSTEMS

3.1.2 Reactivity Anomalies

LCO 3.1.2 The reactivity difference between the monitored core  $k_{eff}$  and the predicted core  $k_{eff}$  shall be within  $\pm~1\%~\Delta k/k$ .

APPLICABILITY: MODES 1 and 2.

### ACTIONS

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	Core reactivity difference not within limit.	A.1	Restore core reactivity difference to within limit.	72 hours
в.	Required Action and associated Completion Time not met.	B.1	Be in MODE 3.	12 hours

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SURVEILLANCE	FREQUENCY
SR 3.1.2.1 Verify core reactivity difference between the monitored core k <sub>eff</sub> and the predicted core k <sub>eff</sub> is within ± 1% Δk/k.	Once within 24 hours after reaching equilibrium conditions following startup after fuel movement within the reactor pressure vessel or control rod replacement <u>AND</u> 1000 MWD/T thereafter during operations in MODE 1

## 3.1 REACTIVITY CONTROL SYSTEMS

## 3.1.3 Control Rod OPERABILITY

LCO 3.1.3 Each control rod shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

Separate Condition entry is allowed for each control rod.

CONDITION		REQUIRED ACTION	COMPLETION TIME
A. One withdrawn cont rod stuck.	Roc be LCC Blc rec	worth minimizer (RWM) may bypassed as allowed by 3.3.2.1, "Control Rod ock Instrumentation," if uired, to allow continued eration.	
	A.1	rod separation criteria are met.	Immediately
	AND	<u>)</u>	
	A.2	Disarm the associated control rod drive (CRD).	2 hours
	<u>AN</u> [	<u>)</u>	
			(continued)

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	(continued)	A.3	Perform SR 3.1.3.2 and SR 3.1.3.3 for each withdrawn OPERABLE control rod.	24 hours from discovery of Condition A concurrent with THERMAL POWER greater than the low power setpoint (LPSP) of the RWM
		AND		
		A.4	Perform SR 3.1.1.1.	72 hours
Β.	Two or more withdrawn control rods stuck.	B.1	Be in MODE 3.	12 hours
С.	One or more control rods inoperable for reasons other than Condition A or B.	C.1	RWM may be bypassed as allowed by LCO 3.3.2.1, if required, to allow insertion of inoperable control rod and continued operation. Fully insert inoperable control rod.	3 hours
		<u>AND</u>		
		C.2	Disarm the associated CRD.	4 hours

ACTIONS

ACT	IONS

CONDITION		REQUIRED ACTION		COMPLETION TIME
D.	Not applicable when THERMAL POWER > 10% RTP.	D.1 <u>OR</u>	Restore compliance with analyzed rod position sequence.	4 hours
	Two or more inoperable control rods not in compliance with analyzed rod position sequence and not separated by two or more OPERABLE control rods.	D.2	Restore control rod to OPERABLE status.	4 hours
Ε.	Required Action and associated Completion Time of Condition A, C, or D not met. <u>OR</u>	E.1	Be in MODE 3.	12 hours
	Nine or more control rods inoperable.			

SURVEILLANCE REQUIREMENTS

		SURVEILLANCE	FREQUENCY
SR	3.1.3.1	Determine the position of each control rod.	24 hours
SR	3.1.3.2	Not required to be performed until 7 days after the control rod is withdrawn and THERMAL POWER is greater than the LPSP of RWM.	
		Insert each fully withdrawn control rod at least one notch.	7 days
SR	3.1.3.3	Not required to be performed until 31 days after the control rod is withdrawn and THERMAL POWER is greater than the LPSP of the RWM.	
		Insert each partially withdrawn control rod at least one notch.	31 days
SR	3.1.3.4	Verify each control rod scram time from fully withdrawn to 90% insertion is <u>≺</u> 7 seconds.	In accordance with SR 3.1.4.1, SR 3.1.4.2, SR 3.1.4.3, and SR 3.1.4.4

SURVEILLANCE	FREQUENCY
SR 3.1.3.5 Verify each control rod does not go to the withdrawn overtravel position.	Each time the control rod is withdrawn to "full out" position <u>AND</u> Prior to declaring control rod OPERABLE after work on control rod or CRD System that could affect coupling

### 3.1 REACTIVITY CONTROL SYSTEMS

3.1.4 Control Rod Scram Times

- LCO 3.1.4 a. No more than 12 OPERABLE control rods shall be "slow," in accordance with Table 3.1.4-1; and
  - b. No more than 2 OPERABLE control rods that are "slow" shall occupy adjacent locations.

APPLICABILITY: MODES 1 and 2.

ACTIONS

<u></u>	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	Requirements of the LCO not met.	A.1	Be in MODE 3.	12 hours

## SURVEILLANCE REQUIREMENTS

During single control rod scram time Surveillances, the control rod drive (CRD) pumps shall be isolated from the associated scram accumulator.

	SURVEILLANCE	FREQUENCY
SR 3.1.4.1	Verify each control rod scram time is within the limits of Table 3.1.4–1 with reactor steam dome pressure ≥ 800 psig.	Prior to exceeding 40% RTP after each reactor shutdown ≥ 120 days

(continued)

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		SURVEILLANCE	FREQUENCY
SR	3.1.4.2	Verify, for a representative sample, each tested control rod scram time is within the limits of Table 3.1.4–1 with reactor steam dome pressure ≥ 800 psig.	120 days cumulative operation in MODE 1
SR	3.1.4.3	Verify each affected control rod scram time is within the limits of Table 3.1.4-1 with any reactor steam dome pressure.	Prior to declaring control rod OPERABLE after work on control rod or CRD System that could affect scram time
SR	3.1.4.4	Verify each affected control rod scram time is within the limits of Table 3.1.4-1 with reactor steam dome pressure ≥ 800 psig.	Prior to exceeding 40% RTP after fuel movement within the affected core cell
			<u>AND</u> Prior to exceeding 40% RTP after work on control rod or CRD System that could affect scram time

Table 3.1.4-1 (page 1 of 1) Control Rod Scram Times

 OPERABLE control rods with scram times not within the limits of this Table are considered "slow."
 Enter applicable Conditions and Required Actions of LCO 3.1.3, "Control Rod OPERABILITY," for control rods with scram times > 7 seconds to 90% insertion. These control rods are inoperable, in accordance with

SR 3.1.3.4, and are not considered "slow."

PERCENT INSERTION	SCRAM TIMES <sup>(a)(b)</sup> (seconds) when REACTOR STEAM DOME PRESSURE <u>&gt;</u> 800 psig
5	0.36
20	0.84
50	1.86
90	3.25

- (a) Maximum scram time from fully withdrawn position based on de-energization of scram pilot valve solenoids at time zero.
- (b) Scram times as a function of reactor steam dome pressure when < 800 psig are within established limits.

Control Rod Scram Accumulators 3.1.5

## 3.1 REACTIVITY CONTROL SYSTEMS

# 3.1.5 Control Rod Scram Accumulators

LCO 3.1.5 Each control rod scram accumulator shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

Separate Condition entry is allowed for each control rod scram accumulator.

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	One control rod scram accumulator inoperable with reactor steam dome pressure ≥ 900 psig.	A.1	Only applicable if the associated control rod scram time was within the limits of Table 3.1.4-1 during the last scram time Surveillance. Declare the associated control rod scram time "slow."	8 hours
		<u>OR</u>		
		A.2	Declare the associated control rod inoperable.	8 hours

ACTIONS

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Β.	Two or more control rod scram accumulators inoperable with reactor steam dome pressure ≥ 900 psig.	B.1	Restore charging water header pressure to ≥ 940 psig.	20 minutes from discovery of Condition B concurrent with charging water header pressure < 940 psig
	· · · · · · · · · · · · · · · · · · ·	<u>and</u>		
		B.2.1	Only applicable if the associated control rod scram time was within the limits of Table 3.1.4-1 during the last scram time Surveillance.	
			Declare the associated control rod scram time "slow."	l hour
		<u> </u>		
		B.2.2	Declare the associated control rod inoperable.	1 hour

ACTI	ONS			
	CONDITION		REQUIRED ACTION	COMPLETION TIME
с.	One or more control rod scram accumulators inoperable with reactor steam dome pressure < 900 psig.	C.1	Verify all control rods associated with inoperable accumulators are fully inserted.	Immediately upon discovery of charging water header pressure < 940 psig
		<u>and</u>		
		C.2	Declare the associated control rod inoperable.	1 hour
D.	Required Action B.1 or C.1 and associated Completion Time not met.	D.1	Not applicable if all inoperable control rod scram accumulators are associated with fully inserted control rods.	
			Place the reactor mode switch in the shutdown position.	Immediately

SURVEILLANCE	REQUIREMENTS
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	FREQUENCY	
SR 3.1.5.1	Verify each control rod scram accumulator pressure is ≥ 940 psig.	7 days

### 3.1 REACTIVITY CONTROL SYSTEMS

### 3.1.6 Rod Pattern Control

LCO	3.1.6	OPERABLE control rods shall comply with the requirements of	
		the analyzed rod position sequence.	

APPLICABILITY: MODES 1 and 2 with THERMAL POWER  $\leq$  10% RTP.

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### ACTIONS

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	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	One or more OPERABLE control rods not in compliance with the analyzed rod position sequence.	A.1	Rod worth minimizer (RWM) may be bypassed as allowed by LCO 3.3.2.1, "Control Rod Block Instrumentation."	
			Move associated control rod(s) to correct position.	8 hours
		<u> 0                                   </u>		
		A.2	Declare associated control rod(s) inoperable.	8 hours

CONDITION		REQUIRED ACTION		COMPLETION TIME	
Β.	Nine or more OPERABLE control rods not in compliance with the analyzed rod position sequence.	B.1	Rod worth minimizer Rod worth minimizer (RWM) may be bypassed as allowed by LCO 3.3.2.1.		
			Suspend withdrawal of control rods.	Immediately	
		AND			
		B.2	Place the reactor mode switch in the shutdown position.	1 hour	

# SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.1.6.1	Verify all OPERABLE control rods comply with the analyzed rod position sequence.	24 hours

# 3.1 REACTIVITY CONTROL SYSTEMS

## 3.1.7 Standby Liquid Control (SLC) System

LCO 3.1.7 Two SLC subsystems shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

### ACTIONS

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	One SLC subsystem inoperable.	A.1	Restore SLC subsystem to OPERABLE status.	7 days
в.	Two SLC subsystems inoperable.	B.1	Restore one SLC subsystem to OPERABLE status.	8 hours
С.	Required Action and associated Completion Time not met.	C.1	Be in MODE 3.	12 hours

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URVEILLANCE REQUIREMENTS	
SURVEILLANCE	FREQUENCY
SR 3.1.7.1 Verify available volume of sodium pentaborate solution is within the limits of Figure 3.1.7-1.	24 hours
SR 3.1.7.2 Verify temperature of sodium pentaborate solution is within the limits of Figure 3.1.7-2.	24 hours
SR 3.1.7.3 Verify temperature of pump suction piping is ≥ 83°F.	24 hours
SR 3.1.7.4 Verify continuity of explosive charge.	31 days
SR 3.1.7.5 Verify the concentration of sodium pentaborate in solution is within the limits of Figure 3.1.7-1.	31 days <u>AND</u> Once within 24 hours after water or sodium pentaborate is added to solution <u>AND</u> Once within 24 hours after solution temperature is restored within the limits of Figure 3.1.7-2

	EILLANCE RE	SURVEILLANCE	FREQUENCY
SR	3.1.7.6	Verify each SLC subsystem manual valve in the flow path that is not locked, sealed, or otherwise secured in position is in the correct position, or can be aligned to the correct position.	31 days
SR	3.1.7.7	Verify each pump develops a flow rate <u>&gt;</u> 40 gpm at a discharge pressure <u>&gt;</u> 1275 psig.	In accordance with the Inservice Testing Program
SR	3.1.7.8	Verify flow through one SLC subsystem from pump into reactor pressure vessel.	24 months on a STAGGERED TEST BASIS
SR	3.1.7.9	Verify all heat traced piping between storage tank and pump suction is unblocked.	24 months <u>AND</u> Once within 24 hours after piping temperature is restored within the limits of Figure 3.1.7-2

SLC System 3.1.7

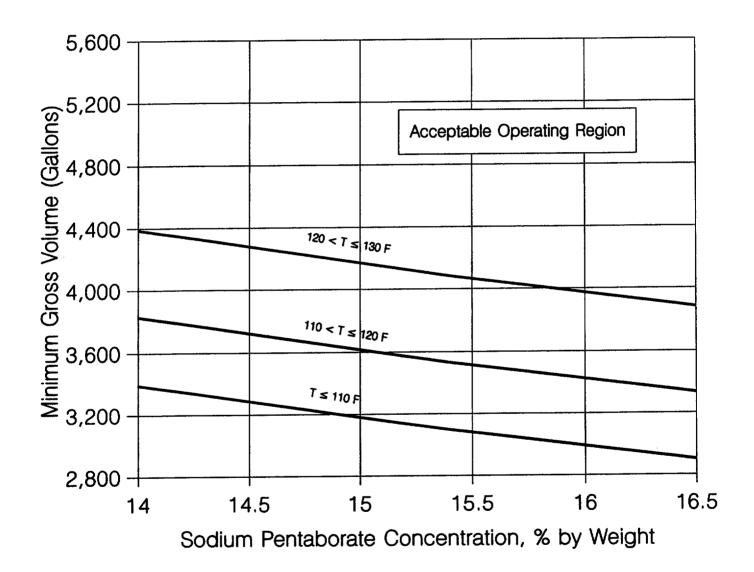


Figure 3.1.7-1 (page 1 of 1) Sodium Pentaborate Volume Requirements

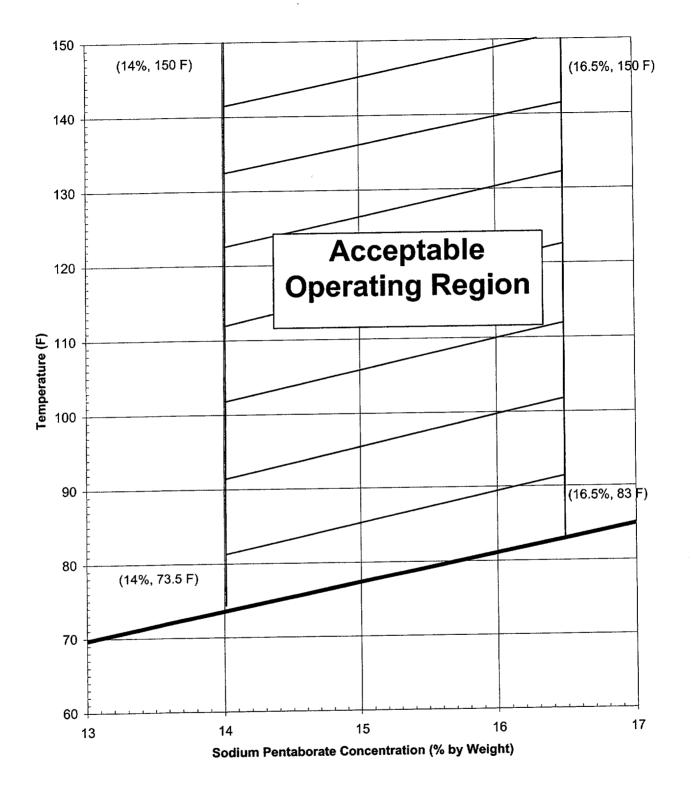


Figure 3.1.7-2 (page 1 of 1) Sodium Pentaborate Temperature Requirements

#### 3.1 REACTIVITY CONTROL SYSTEMS

3.1.8 Scram Discharge Volume (SDV) Vent and Drain Valves

LCO 3.1.8 Each SDV vent and drain valve shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

Separate Condition entry is allowed for each SDV vent and drain line.

 An isolated line may be unisolated under administrative control to allow draining and venting of the SDV.

<u></u>	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	One or more SDV vent or drain lines with one valve inoperable.	A.1	Isolate the associated line.	7 days
В.	One or more SDV vent or drain lines with both valves inoperable.	B.1	Isolate the associated line.	8 hours
С.	Required Action and associated Completion Time not met.	C.1	Be in MODE 3.	12 hours

	SURVEILLANCE	FREQUENCY
SR 3.1.8.1	Not required to be met on vent and drain valves closed during performance of SR 3.1.8.2.	
	Verify each SDV vent and drain valve is open.	31 days
SR 3.1.8.2	Cycle each SDV vent and drain valve to the fully closed and fully open position.	92 days
SR 3.1.8.3	<ul> <li>Verify each SDV vent and drain valve:</li> <li>a. Closes in ≤ 30 seconds after receipt of an actual or simulated scram signal; and</li> <li>b. Opens when the actual or simulated scram signal is reset.</li> </ul>	24 months

## 3.2 POWER DISTRIBUTION LIMITS

3.2.1 AVERAGE PLANAR LINEAR HEAT GENERATION RATE (APLHGR)

LCO 3.2.1 All APLHGRs shall be less than or equal to the limits specified in the COLR.

APPLICABILITY: THERMAL POWER  $\geq$  25% RTP.

### ACTIONS

	CONDITION	REQUIRED ACTION		COMPLETION TIME
Α.	Any APLHGR not within limits.	A.1	Restore APLHGR(s) to within limits.	2 hours
в.	Required Action and associated Completion Time not met.	B.1	Reduce THERMAL POWER to < 25% RTP.	4 hours

	SURVEILLANCE	FREQUENCY
SR 3.2.1.1	Verify all APLHGRs are less than or equal to the limits specified in the COLR.	Once within 12 hours after ≥ 25% RTP <u>AND</u> 24 hours thereafter
		therearter

### 3.2 POWER DISTRIBUTION LIMITS

3.2.2 MINIMUM CRITICAL POWER RATIO (MCPR)

LCO 3.2.2 All MCPRs shall be greater than or equal to the MCPR operating limits specified in the COLR.

APPLICABILITY: THERMAL POWER  $\geq$  25% RTP.

### ACTIONS

CONDITION		REQUIRED ACTION		COMPLETION TIME
Α.	Any MCPR not within limits.	A.1	Restore MCPR(s) to within limits.	2 hours
в.	Required Action and associated Completion Time not met.	B.1	Reduce THERMAL POWER to < 25% RTP.	4 hours

SURVEILLANCE REQUIREMENTS

	FREQUENCY	
SR 3.2.2.1	Verify all MCPRs are greater than or equal to the limits specified in the COLR.	Once within 12 hours after ≥ 25% RTP
		AND
		24 hours thereafter

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SURVEILLANCE REQUIREMENTS

	FREQUENCY	
SR 3.2.2.2	Determine the MCPR limits.	Once within 72 hours after each completion of SR 3.1.4.1
		AND
		Once within 72 hours after each completion of SR 3.1.4.2
		AND
		Once within 72 hours after each completion of SR 3.1.4.4

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## 3.2 POWER DISTRIBUTION LIMITS

# 3.2.3 LINEAR HEAT GENERATION RATE (LHGR)

All LHGRs shall be less than or equal to the limits LCO 3.2.3 specified in the COLR.

APPLICABILITY: THERMAL POWER  $\geq$  25% RTP.

### ACTIONS

CONDITION		REQUIRED ACTION		COMPLETION TIME
Α.	Any LHGR not within limits.	A.1	Restore LHGR(s) to within limits.	2 hours
в.	Required Action and associated Completion Time not met.	B.1	Reduce THERMAL POWER to < 25% RTP.	4 hours

SURVEILLANCE	FREQUENCY
SR 3.2.3.1 Verify all LHGRs are less than or equal to the limits specified in the COLR.	Once within 12 hours after <u>&gt;</u> 25% RTP <u>AND</u> 24 hours thereafter

# 3.2 POWER DISTRIBUTION LIMITS

3.2.4 Average Power Range Monitor (APRM) Gain and Setpoint

- LCO 3.2.4 a. FDLRC shall be less than or equal to 1.0; or
  - b. Each required APRM Flow Biased Neutron Flux-High Function Allowable Value shall be modified by 1/FDLRC; or
  - c. Each required APRM gain shall be adjusted such that the APRM readings are  $\geq 100\%$  times the Fraction of RTP (FRTP) times FDLRC.

APPLICABILITY: THERMAL POWER ≥ 25% RTP.

ACTION	S
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	CONDITION	•	REQUIRED ACTION	COMPLETION TIME
Α.	Requirements of the LCO not met.	A.1	Satisfy the requirements of the LCO.	6 hours
В.	Required Action and associated Completion Time not met.	B.1	Reduce THERMAL POWER to < 25% RTP.	4 hours

	FREQUENCY	
SR 3.2.4.1	Not required to be met if SR 3.2.4.2 is satisfied for LCO 3.2.4.b or LCO 3.2.4.c requirements.	
	Verify FDLRC is within limits.	Once within 12 hours after <u>&gt;</u> 25% RTP <u>AND</u> 24 hours thereafter
SR 3.2.4.2	Not required to be met if SR 3.2.4.1 is satisfied for LCO 3.2.4.a requirements.	
	<ul> <li>Verify each required:</li> <li>a. APRM Flow Biased Neutron Flux - High Function Allowable Value is modified by 1/FDLRC; or</li> <li>b. APRM gain is adjusted such that the APRM reading is ≥ 100% times the FRTP times FDLRC.</li> </ul>	12 hours

### 3.3 INSTRUMENTATION

3.3.1.1 Reactor Protection System (RPS) Instrumentation

LCO 3.3.1.1 The RPS instrumentation for each Function in Table 3.3.1.1-1 shall be OPERABLE.

APPLICABILITY: According to Table 3.3.1.1-1.

#### ACTIONS

Separate Condition entry is allowed for each channel.

2. When Functions 2.b and 2.c channels are inoperable due to APRM indication not within limits, entry into associated Conditions and Required Actions may be delayed for up to 2 hours if the APRM is indicating a lower power value than the calculated power, and for up to 12 hours if the APRM is indicating a higher power value than the calculated power.

	CONDITION	REQUIRED ACTION		COMPLETION TIME
Α.	One or more required channels inoperable.	A.1	Place channel in trip.	12 hours
		<u>0R</u>		
		A.2	Place associated trip system in trip.	12 hours
в.	One or more Functions with one or more required channels	B.1	Place channel in one trip system in trip.	6 hours
	inoperable in both trip systems.	<u>OR</u> B.2	Place one trip system in trip.	6 hours

ACTIONS

	CONDITION		REQUIRED ACTION	COMPLETION TIME
C.	One or more Functions with RPS trip capability not maintained.	C.1	Restore RPS trip capability.	1 hour
D.	Required Action and associated Completion Time of Condition A, B, or C not met.	D.1	Enter the Condition referenced in Table 3.3.1.1-1 for the channel.	Immediately
E.	As required by Required Action D.1 and referenced in Table 3.3.1.1-1.	E.1	Reduce THERMAL POWER to < 45% RTP.	4 hours
F.	As required by Required Action D.1 and referenced in Table 3.3.1.1-1.	F.1 <u>AND</u> F.2	Be in MODE 2. Only required to be met for Function 5, Main Steam Isolation Valve - Closure, and Function 10, Turbine Condenser Vacuum - Low. Reduce reactor pressure to < 600 psig.	8 hours 8 hours

(continued)

AC	ΤI	ONS	

	CONDITION		REQUIRED ACTION	COMPLETION TIME	
G.	As required by Required Action D.1 and referenced in Table 3.3.1.1-1.	G.1	Be in MODE 3.	12 hours	
н.	As required by Required Action D.1 and referenced in Table 3.3.1.1-1.	Н.1	Initiate action to fully insert all insertable control rods in core cells containing one or more fuel assemblies.	Immediately	

- Refer to Table 3.3.1.1-1 to determine which SRs apply for each RPS Function.
- 2. When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours provided the associated Function maintains RPS trip capability.

		SURVEILLANCE	FREQUENCY
SR 3.3.1	.1.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.1	.1.2	Not required to be performed until 12 hours after THERMAL POWER $\geq 25\%$ RTP. Verify the absolute difference between the average power range monitor (APRM) channels and the calculated power is $\leq 2\%$ RTP plus any gain adjustment required by LCO 3.2.4, "Average Power Range Monitor (APRM) Gain and Setpoint" while operating at $\geq 25\%$ RTP.	7 days
SR 3.3.1	.1.3	Adjust the channel to conform to a calibrated flow signal.	7 days

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SURVEILLANCE REQUIREMENTS

		SURVEILLANCE	FREQUENCY
SR	3.3.1.1.4	Not required to be performed when entering MODE 2 from MODE 1 until 24 hours after entering MODE 2.	
		Perform CHANNEL FUNCTIONAL TEST.	7 days
SR	3.3.1.1.5	Perform a functional test of each RPS automatic scram contactor.	7 days
SR	3.3.1.1.6	Verify the source range monitor (SRM) and intermediate range monitor (IRM) channels overlap.	Prior to fully withdrawing SRMs
SR	3.3.1.1.7	Only required to be met during entry into MODE 2 from MODE 1.	
		Verify the IRM and APRM channels overlap.	7 days
SR	3.3.1.1.8	Perform CHANNEL FUNCTIONAL TEST.	31 days
SR	3.3.1.1.9	Calibrate the local power range monitors.	2000 effective full power hours
SR	3.3.1.1.10	Perform CHANNEL CALIBRATION.	31 days

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SUR	/EILLANCE REQ	UIREMENTS	·
		SURVEILLANCE	FREQUENCY
SR	3.3.1.1.11	Perform CHANNEL FUNCTIONAL TEST.	92 days
SR	3.3.1.1.12	Calibrate the trip units.	92 days
SR	3.3.1.1.13	Perform CHANNEL CALIBRATION.	92 days
SR	3.3.1.1.14	Verify Turbine Stop Valve-Closure and Turbine Control Valve Fast Closure, Trip Oil Pressure-Low Functions are not bypassed when THERMAL POWER is ≥ 45% RTP.	92 days
SR	3.3.1.1.15	<ol> <li>Neutron detectors are excluded.</li> </ol>	
		<ol> <li>For Function 2.a, not required to be performed when entering MODE 2 from MODE 1 until 24 hours after entering MODE 2.</li> </ol>	
		<ol> <li>For Function 2.b, not required for the flow portion of the channels.</li> </ol>	
		Perform CHANNEL CALIBRATION.	184 days
SR	3.3.1.1.16	Perform CHANNEL FUNCTIONAL TEST.	24 months
			(

SURVEILLANCE REQUIREMENTS

		SURVEILLANCE	FREQUENCY
SR	3.3.1.1.17	<ol> <li>Neutron detectors are excluded.</li> <li>For Function 1.a, not required to be performed when entering MODE 2 from MODE 1 until 24 hours after entering MODE 2.</li> </ol>	
		Perform CHANNEL CALIBRATION.	24 months
SR	3.3.1.1.18	Perform LOGIC SYSTEM FUNCTIONAL TEST.	24 months
SR	3.3.1.1.19	<ol> <li>Neutron detectors are excluded.</li> <li>For Function 5 "n" equals 4 channels for the purpose of determining the STAGGERED TEST BASIS Frequency.</li> <li>Verify the RPS RESPONSE TIME is within limits.</li> </ol>	24 months on a STAGGERED TEST BASIS

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	CONDITIONS REFERENCED FROM REQUIRED ACTION D.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
<ol> <li>Intermediate Range Monitors</li> </ol>					
a. Neutron Flux - High	2	3	G	SR 3.3.1.1.1 SR 3.3.1.1.4 SR 3.3.1.1.5 SR 3.3.1.1.6 SR 3.3.1.1.7 SR 3.3.1.1.17 SR 3.3.1.1.18	≤ 121/125 divisions of full scale
	5(a)	3	н	SR 3.3.1.1.1 SR 3.3.1.1.4 SR 3.3.1.1.5 SR 3.3.1.1.17 SR 3.3.1.1.18	<u>≺</u> 121/125 divisions of full scale
b. Inop	2	3	G	SR 3.3.1.1.4 SR 3.3.1.1.5 SR 3.3.1.1.18	NA
	5 <sup>(a)</sup>	3	н	SR 3.3.1.1.4 SR 3.3.1.1.5 SR 3.3.1.1.18	NA
2. Average Power Range Monitors					
a. Neutron Flux — High, Setdown	2	2	G	<pre>SR 3.3.1.1.1 SR 3.3.1.1.4 SR 3.3.1.1.5 SR 3.3.1.1.7 SR 3.3.1.1.9 SR 3.3.1.1.15 SR 3.3.1.1.15</pre>	<u>≺</u> 17.1% RTP
b. Flow Biased Neutron Flux - High	1	2	F	<pre>SR 3.3.1.1.1 SR 3.3.1.1.2 SR 3.3.1.1.3 SR 3.3.1.1.5 SR 3.3.1.1.9 SR 3.3.1.1.11 SR 3.3.1.1.15 SR 3.3.1.1.15 SR 3.3.1.1.17 SR 3.3.1.1.18 SR 3.3.1.1.19</pre>	<u>&lt;</u> 0.58 ₩ + 63.5% RTP <u>&lt;</u> 120% RTP <sup>(b</sup>
					(continu

#### Table 3.3.1.1-1 (page 1 of 3) Reactor Protection System Instrumentation

(a) With any control rod withdrawn from a core cell containing one or more fuel assemblies.

(b) 0.58 W + 59.2% and ≤ 118.5% RTP when reset for single loop operation per LCO 3.4.1. "Recirculation Loops Operating."

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	FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	CONDITIONS REFERENCED FROM REQUIRED ACTION D.1	SURVEILLANCE REOUIREMENTS	ALLOWABLE VALUE
2.	Average Power Range Monitors (continued)					
	c. Fixed Neutron Flux — High	1	2	F	SR 3.3.1.1.1 SR 3.3.1.1.2 SR 3.3.1.1.5 SR 3.3.1.1.9 SR 3.3.1.1.11 SR 3.3.1.1.15 SR 3.3.1.1.15 SR 3.3.1.1.18 SR 3.3.1.1.19	<u>≺</u> 120% RTP
	d. Inop	1,2	2	G	SR 3.3.1.1.5 SR 3.3.1.1.9 SR 3.3.1.1.11 SR 3.3.1.1.18	NA
3.	Reactor Vessel Steam Dome Pressure - High	1,2	2	G	SR 3.3.1.1.5 SR 3.3.1.1.8 SR 3.3.1.1.13 SR 3.3.1.1.18 SR 3.3.1.1.18 SR 3.3.1.1.19	<u>&lt;</u> 1058 psig
4.	Reactor Vessel Water Level - Low	1.2	2	G	SR 3.3.1.1.1 SR 3.3.1.1.5 SR 3.3.1.1.1 SR 3.3.1.1.12 SR 3.3.1.1.17 SR 3.3.1.1.18 SR 3.3.1.1.19	<u>&gt;</u> 10.24 inches
5.	Main Steam Isolation Valve - Closure	1. 2 <sup>(c)</sup>	8	F	SR 3.3.1.1.5 SR 3.3.1.1.11 SR 3.3.1.1.17 SR 3.3.1.1.18 SR 3.3.1.1.19	<u>≺</u> 9.5% cìosed
6.	Drywell Pressure - High	1,2	2	G	SR 3.3.1.1.5 SR 3.3.1.1.11 SR 3.3.1.1.13 SR 3.3.1.1.18 SR 3.3.1.1.19	<u>&lt;</u> 1.94 psig

#### Table 3.3.1.1-1 (page 2 of 3) Reactor Protection System Instrumentation

(c) With reactor pressure  $\geq$  600 psig.

(continued)

Dresden 2 and 3

	FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	CONDITIONS REFERENCED FROM REQUIRED ACTION D.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
7.	Scram Discharge Volume Water Level - High					
	a. Thermal Switch (Unit 2) Float Switch (Unit 3)	1,2	2	G	SR 3.3.1.1.5 SR 3.3.1.1.11 SR 3.3.1.1.17 SR 3.3.1.1.18	<u>&lt;</u> 37.9 gallons (Unit 2) <u>&lt;</u> 39.1 gallons (Unit 3)
		5(a)	2	Н	SR 3.3.1.1.5 SR 3.3.1.1.11 SR 3.3.1.1.17 SR 3.3.1.1.18	<u>&lt;</u> 37.9 gallons (Unit 2) <u>&lt;</u> 39.1 gallons (Unit 3)
	b. Differential Pressure Switch	1.2	2	G	SR 3.3.1.1.5 SR 3.3.1.1.11 SR 3.3.1.1.17 SR 3.3.1.1.18	<u>&lt;</u> 37.9 gallons (Unit 2) <u>&lt;</u> 39.1 gallons (Unit 3)
		5 <sup>(a)</sup>	2	н	SR 3.3.1.1.5 SR 3.3.1.1.11 SR 3.3.1.1.17 SR 3.3.1.1.18	<u>&lt;</u> 37.9 gallons (Unit 2) <u>&lt;</u> 39.1 gallons (Unit 3)
8.	Turbine Stop Valve - Closure	<u>&gt;</u> 45% RTP	4	E	SR 3.3.1.1.5 SR 3.3.1.1.11 SR 3.3.1.1.14 SR 3.3.1.1.17 SR 3.3.1.1.18 SR 3.3.1.1.19	<u>≺</u> 9.5% closed
9.	Turbine Control Valve Fast Closure, Trip Oil Pressure - Low	<u>&gt;</u> 45% RTP	2	E	SR 3.3.1.1.5 SR 3.3.1.1.11 SR 3.3.1.1.14 SR 3.3.1.1.17 SR 3.3.1.1.18 SR 3.3.1.1.19	<u>&gt;</u> 466 psig
10.	Turbine Condenser Vacuum - Low	1, 2 <sup>(c)</sup>	2	F	SR 3.3.1.1.5 SR 3.3.1.1.8 SR 3.3.1.1.10 SR 3.3.1.1.18 SR 3.3.1.1.18 SR 3.3.1.1.19	<u>&gt;</u> 21.15 inches Hg vacuum
11.	Reactor Mode Switch -	1,2	1	G	SR 3.3.1.1.16 SR 3.3.1.1.18	NA
	Shutdown Position	5 <sup>(a)</sup>	1	н	SR 3.3.1.1.16 SR 3.3.1.1.18	NA
12.	Manual Scram	1,2	1	G	SR 3.3.1.1.8 SR 3.3.1.1.18	NA
		5(a)	1	н	SR 3.3.1.1.8 SR 3.3.1.1.18	NA

# Table 3.3.1.1-1 (page 3 of 3) Reactor Protection System Instrumentation

(a) With any control rod withdrawn from a core cell containing one or more fuel assemblies.

(c) With reactor pressure  $\geq$  600 psig.

# 3.3 INSTRUMENTATION

3.3.1.2 Source Range Monitor (SRM) Instrumentation

The SRM instrumentation in Table 3.3.1.2-1 shall be LCO 3.3.1.2 OPERABLE.

APPLICABILITY: According to Table 3.3.1.2-1.

# ACTIONS

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	One or more required SRMs inoperable in MODE 2 with intermediate range monitors (IRMs) on Range 2 or below.	A.1	Restore required SRMs to OPERABLE status.	4 hours
В.	Three required SRMs inoperable in MODE 2 with IRMs on Range 2 or below.	B.1	Suspend control rod withdrawal	Immediately
С.	Required Action and associated Completion Time of Condition A or B not met.	C.1	Be in MODE 3.	12 hours

ACTIONS

	REQUIRED ACTION	COMPLETION TIME
D.1	Fully insert all insertable control rods.	1 hour
AND		
D.2	Place reactor mode switch in the shutdown position.	l hour
E.1	Suspend CORE ALTERATIONS except for control rod insertion.	Immediately
<u>AND</u>		
E.2	Initiate action to fully insert all insertable control rods in core cells containing one or more fuel assemblies.	Immediately
	AND D.2 E.1 AND	<ul> <li>D.1 Fully insert all insertable control rods.</li> <li><u>AND</u></li> <li>D.2 Place reactor mode switch in the shutdown position.</li> <li>E.1 Suspend CORE ALTERATIONS except for control rod insertion.</li> <li><u>AND</u></li> <li>E.2 Initiate action to fully insert all insertable control rods in core cells containing one or</li> </ul>

Refer to Table 3.3.1.2-1 to determine which SRs apply for each applicable MODE or other specified condition.

FREQUENCY SURVEILLANCE 12 hours SR 3.3.1.2.1 Perform CHANNEL CHECK. -----NOTES-----SR 3.3.1.2.2 1. Only required to be met during CORE ALTERATIONS. 2. One SRM may be used to satisfy more than one of the following. 12 hours Verify an OPERABLE SRM detector is located in: a. The fueled region; b. The core quadrant where CORE ALTERATIONS are being performed, when the associated SRM is included in the fueled region; and c. A core quadrant adjacent to where CORE ALTERATIONS are being performed, when the associated SRM is included in the fueled region. 24 hours SR 3.3.1.2.3 Perform CHANNEL CHECK. (continued)

		SURVEILLANCE	FREQUENCY
SR	3.3.1.2.4	Not required to be met with less than or equal to four fuel assemblies adjacent to the SRM and no other fuel assemblies in the associated core quadrant.	
		Verify count rate is: a. ≥ 3.0 cps; or	12 hours during CORE ALTERATIONS
		b. ≥ 0.7 cps with a signal to noise ratio ≥ 20:1.	<u>AND</u> 24 hours
SR	3.3.1.2.5	The determination of signal to noise ratio is not required to be met with less than or equal to four fuel assemblies adjacent to the SRM and no other fuel assemblies in the associated core quadrant.	
		Perform CHANNEL FUNCTIONAL TEST and determination of signal to noise ratio.	7 days
SR	3.3.1.2.6	Not required to be performed until 12 hours after IRMs on Range 2 or below.	
		Perform CHANNEL FUNCTIONAL TEST and determination of signal to noise ratio.	31 days

	SURVEILLANCE	FREQUENCY
SR 3.3.1.2.7	<ol> <li>Neutron detectors are excluded.</li> <li>Not required to be performed until 12 hours after IRMs on Range 2 or below.</li> <li>Perform CHANNEL CALIBRATION.</li> </ol>	24 months

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	SURVEILLANCE REQUIREMENTS
. Source Range Monitor	2 <sup>(a)</sup>	3	SR 3.3.1.2.1 SR 3.3.1.2.4 SR 3.3.1.2.6 SR 3.3.1.2.7
	3,4	2	SR 3.3.1.2.3 SR 3.3.1.2.4 SR 3.3.1.2.6 SR 3.3.1.2.7
	5	2 <sup>(b)(c)</sup>	SR 3.3.1.2.1 SR 3.3.1.2.2 SR 3.3.1.2.4 SR 3.3.1.2.5 SR 3.3.1.2.7

#### Table 3.3.1.2-1 (page 1 of 1) Source Range Monitor Instrumentation

(a) With IRMs on Range 2 or below.

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(b) Only one SRM channel is required to be OPERABLE during spiral offload or reload when the fueled region includes only that SRM detector.

(c) Special movable detectors may be used in place of SRMs if connected to normal SRM circuits.

Control Rod Block Instrumentation 3.3.2.1

# 3.3 INSTRUMENTATION

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3.3.2.1 Control Rod Block Instrumentation

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The control rod block instrumentation for each Function in LCO 3.3.2.1 Table 3.3.2.1-1 shall be OPERABLE.

APPLICABILITY: According to Table 3.3.2.1-1.

#### ACTIONS

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	One rod block monitor (RBM) channel inoperable.	A.1	Restore RBM channel to OPERABLE status.	24 hours
Β.	Required Action and associated Completion Time of Condition A not met. <u>OR</u>	B.1	Place one RBM channel in trip.	1 hour
	Two RBM channels inoperable.			
c.	Rod worth minimizer (RWM) inoperable during reactor startup.	C.1 <u>OR</u>	Suspend control rod movement except by scram.	Immediately
		<u></u>		(continued)

ACTIONS

CONDITION		REQUIRED ACTION	COMPLETION TIME
C. (continued)	C.2.1.1	Verify <u>&gt;</u> 12 rods withdrawn.	Immediately
	C.2.1.2	<u>OR</u> Verify by administrative methods that startup with RWM inoperable has not been performed in the last 12 months.	Immediately
	AND		
	C.2.2	Verify movement of control rods is in compliance with analyzed rod position sequence by a second licensed operator or other qualified member of the technical staff.	During control rod movement
D. RWM inoperable during reactor shutdown.	D.1	Verify movement of control rods is in compliance with analyzed rod position sequence by a second licensed operator or other qualified member of the technical staff.	During control rod movement

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Moo Pos	e or more Reactor de Switch-Shutdown sition channels operable.	E.1 <u>AND</u>	Suspend control rod withdrawal.	Immediately
		E.2	Initiate action to fully insert all insertable control rods in core cells containing one or more fuel assemblies.	Immediately

 Refer to Table 3.3.2.1-1 to determine which SRs apply for each Control Rod Block Function.

2. When an RBM channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours provided the associated Function maintains control rod block capability.

	<u>- , , , , , , , , , , , , , , , , , , ,</u>	SURVEILLANCE	FREQUENCY
SR	3.3.2.1.1	Perform CHANNEL FUNCTIONAL TEST.	92 days
SR	3.3.2.1.2	Not required to be performed until 1 hour after any control rod is withdrawn at $\leq$ 10% RTP in MODE 2.	
		Perform CHANNEL FUNCTIONAL TEST.	92 days
SR	3.3.2.1.3	Not required to be performed until 1 hour after THERMAL POWER is ≤ 10% RTP in MODE 1. Perform CHANNEL FUNCTIONAL TEST.	92 days
SR	3.3.2.1.4	Neutron detectors are excluded.	
		Perform CHANNEL CALIBRATION.	92 days

Control Rod Block Instrumentation 3.3.2.1

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SURV	EILLANCE REQ	UIREMENTS	
		SURVEILLANCE	FREQUENCY
SR	3.3.2.1.5	Neutron detectors are excluded.	
		Verify the RBM is not bypassed when THERMAL POWER is ≥ 30% RTP and when a peripheral control rod is not selected.	92 days
SR	3.3.2.1.6	Verify the RWM is not bypassed when THERMAL POWER is <u>&lt;</u> 10% RTP.	24 months
SR	3.3.2.1.7	Not required to be performed until Notr after reactor mode switch is in the shutdown position.	
	·	Perform CHANNEL FUNCTIONAL TEST.	24 months
SR	3.3.2.1.8	Verify control rod sequences input to the RWM are in conformance with analyzed rod position sequence.	Prior to declaring RWM OPERABLE following loading of sequence into RWM
SR	3.3.2.1.9	Verify the bypassing and position of control rods required to be bypassed in RWM by a second licensed operator or other qualified member of the technical staff.	Prior to and during the movement of control rods bypassed in RWM

Table	3.3.2.1-1	(page 1 of 1)
Control	Rod Block	Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
. Rod Block Monitor				
a. Upscale	(a)	2	SR 3.3.2.1.1 SR 3.3.2.1.4 SR 3.3.2.1.5	As specified ir the COLR
b. Inop	(a)	2	SR 3.3.2.1.1 SR 3.3.2.1.5	NA
c. Downscale	(a)	2	SR 3.3.2.1.1 SR 3.3.2.1.4 SR 3.3.2.1.5	<u>&gt;</u> 4.03% RTP
. Rod Worth Minimizer	1 <sup>(b)</sup> ,2 <sup>(b)</sup>	1	SR 3.3.2.1.2 SR 3.3.2.1.3 SR 3.3.2.1.6 SR 3.3.2.1.8 SR 3.3.2.1.9	NA
. Reactor Mode Switch - Shutdown Position	(c)	2	SR 3.3.2.1.7	NA

(a) THERMAL POWER  $\geq$  30% RTP and no peripheral control rod selected.

(b) With THERMAL POWER  $\leq$  10% RTP.

(c) Reactor mode switch in the shutdown position.

Feedwater System and Main Turbine High Water Level Trip Instrumentation 3.3.2.2

# 3.3 INSTRUMENTATION

- 3.3.2.2 Feedwater System and Main Turbine High Water Level Trip Instrumentation
- LCO 3.3.2.2 Four channels of Feedwater System and main turbine high water level trip instrumentation shall be OPERABLE.

APPLICABILITY: THERMAL POWER  $\geq$  25% RTP.

#### ACTIONS

Separate Condition entry is allowed for each channel.

<u> </u>	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	One or more Feedwater System and main turbine high water level trip channels inoperable.	A.1	Place channel in trip.	7 days
Β.	Feedwater System and main turbine high water level trip capability not maintained.	B.1	Restore Feedwater System and main turbine high water level trip capability.	2 hours

Feedwater System and Main Turbine High Water Level Trip Instrumentation 3.3.2.2

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME	
C. Required Action and associated Completion Time not met.	C.1	Only applicable if inoperable channel is the result of an inoperable feedwater pump breaker. Remove affected	4 hours	
	<u>OR</u>	feedwater pump(s) from service.		
	C.2	Reduce THERMAL POWER to < 25% RTP.	4 hours	

Feedwater System and Main Turbine High Water Level Trip Instrumentation 3.3.2.2

# SURVEILLANCE REQUIREMENTS

When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours provided Feedwater System and main turbine high water level trip capability is maintained.

		SURVEILLANCE	FREQUENCY
SR	3.3.2.2.1	Perform CHANNEL CHECK.	12 hours
SR	3.3.2.2.2	Perform CHANNEL FUNCTIONAL TEST.	92 days
SR	3.3.2.2.3	Calibrate the trip units.	92 days
SR	3.3.2.2.4	Perform CHANNEL CALIBRATION. The Allowable Value shall be <u>&lt;</u> 53.25 inches.	24 months
SR	3.3.2.2.5	Perform LOGIC SYSTEM FUNCTIONAL TEST, including breaker and valve actuation.	24 months

## 3.3 INSTRUMENTATION

3.3.3.1 Post Accident Monitoring (PAM) Instrumentation

LCO 3.3.3.1 The PAM instrumentation for each Function in Table 3.3.3.1-1 shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

LCO 3.0.4 is not applicable.

2. Separate Condition entry is allowed for each Function.

<u></u>	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	One or more Functions with one required channel inoperable.	A.1	Restore required channel to OPERABLE status.	30 days
В.	Required Action and associated Completion Time of Condition A not met.	B.1	Initiate action in accordance with Specification 5.6.6.	Immediately
С.	One or more Functions with two required channels inoperable.	C.1	Restore one required channel to OPERABLE status.	7 days

(continued)

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CONDITION		REQUIRED ACTION		COMPLETION TIME
D.	Required Action and associated Completion Time of Condition C not met.	D.1	Enter the Condition referenced in Table 3.3.3.1-1 for the channel.	Immediately
E.	As required by Required Action D.1 and referenced in Table 3.3.3.1-1.	E.1	Be in MODE 3.	12 hours
F.	As required by Required Action D.1 and referenced in Table 3.3.3.1-1.	F.1	Initiate action in accordance with Specification 5.6.6.	Immediately

# 1. These SRs apply to each Function in Table 3.3.3.1-1, except where

- 1. These SRs apply to each Function in Table 3.3.3.1-1, except where identified in the SR.
- 2. When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours provided the other required channel in the associated Function is OPERABLE.

<del></del>		FREQUENCY	
SR	3.3.3.1.1	Perform CHANNEL CHECK.	31 days
SR	3.3.3.1.2	Perform CHANNEL CALIBRATION for Functions 4.b, 7, and 8.	92 days
SR	3.3.3.1.3	For Function 2, not required for the transmitters of the channels.	
		Perform CHANNEL CALIBRATION for Functions 1 and 2.	184 days
SR	3.3.3.1.4	Perform CHANNEL CALIBRATION for Functions 3 and 9.	12 months
SR	3.3.3.1.5	Perform CHANNEL CALIBRATION for Functions 2, 4.a, 5, and 6.	24 months

	FUNCTION	REQUIRED CHANNELS	CONDITIONS REFERENCED FROM REQUIRED ACTION D.1
1.	Reactor Vessel Pressure	2	E
2.	Reactor Vessel Water Level		
	a. Fuel Zone (Wide Range)	2	E
	b. Medium Range	2	ε
3.	Torus Water Level	2	E
4.	Drywell Pressure		
	a. Wide Range	2	E
	b. Narrow Range	2	E
5.	Drywell Radiation Monitors	2	F
6.	Penetration Flow Path PCIV Position	2 per penetration flow path(a)(b)	£
7.	Drywell $H_2$ Concentration Analyzer and Monitor	2	E
8.	Drywell $O_2$ Concentration Analyzer and Monitor	2	Ε
9.	Torus Water Temperature	2	E

#### Table 3.3.3.1-1 (page 1 of 1) Post Accident Monitoring Instrumentation

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

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

Dresden 2 and 3

Amendment No. 185/180

### 3.3 INSTRUMENTATION

- 3.3.4.1 Anticipated Transient Without Scram Recirculation Pump Trip (ATWS-RPT) Instrumentation
- LCO 3.3.4.1 Two channels per trip system for each ATWS-RPT instrumentation Function listed below shall be OPERABLE:
  - a. Reactor Vessel Water Level Low Low; and
  - b. Reactor Vessel Steam Dome Pressure-High.

APPLICABILITY: MODE 1.

ACTIONS

Separate Condition entry is allowed for each channel.

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One or more channels inoperable.	A.1 <u>OR</u>	Restore channel to OPERABLE status.	14 days
	A.2	Not applicable if inoperable channel is the result of an inoperable breaker. Place channel in trip.	14 days

(continued)

Dresden 2 and 3

ACTI	ONS
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CONDITION		REQUIRED ACTION		COMPLETION TIME	
Β.	One Function with ATWS-RPT trip capability not maintained.	B.1	Restore ATWS-RPT trip capability.	72 hours	
C.	Both Functions with ATWS-RPT trip capability not maintained.	C.1	Restore ATWS-RPT trip capability for one Function.	1 hour	
D.	Required Action and associated Completion Time not met.	D.1 <u>OR</u>	Remove the associated recirculation pump from service.	6 hours	
		D.2	Be in MODE 2.	6 hours	

ATWS-RPT Instrumentation 3.3.4.1

#### SURVEILLANCE REQUIREMENTS

When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours provided the associated Function maintains ATWS-RPT trip capability.

		SURVEILLANCE	FREQUENCY
SR	3.3.4.1.1	Perform CHANNEL CHECK.	12 hours
SR	3.3.4.1.2	Calibrate the trip units.	92 days
SR	3.3.4.1.3	Perform CHANNEL FUNCTIONAL TEST.	92 days
SR	3.3.4.1.4	<ul> <li>Perform CHANNEL CALIBRATION. The Allowable Values shall be:</li> <li>a. Reactor Vessel Water Level-Low Low:</li></ul>	24 months
SR	3.3.4.1.5	Perform LOGIC SYSTEM FUNCTIONAL TEST including breaker actuation.	24 months

# 3.3 INSTRUMENTATION

3.3.5.1 Emergency Core Cooling System (ECCS) Instrumentation

LCO 3.3.5.1 The ECCS instrumentation for each Function in Table 3.3.5.1-1 shall be OPERABLE.

APPLICABILITY: According to Table 3.3.5.1-1.

# ACTIONS

Separate Condition entry is allowed for each channel.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more channels inoperable.	A.1 Enter the Condition referenced in Table 3.3.5.1-1 for the channel.	Immediately

(continued)

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CONDITION		REQUIRED ACTION	COMPLETION TIME
B. As required by Required Action A.1 and referenced in Table 3.3.5.1-1.	B.1	<pre>NOTES 1. Only applicable in MODES 1, 2, and 3.</pre>	
		<ol> <li>Only applicable for Functions</li> <li>1.a, 1.b, 2.a,</li> <li>2.b, 2.d, and</li> <li>2.j.</li> </ol>	
		Declare supported feature(s) inoperable when its redundant feature ECCS initiation capability is inoperable.	1 hour from discovery of loss of initiation capability for feature(s) in both divisions
	<u>and</u>		
	B.2	Only applicable for Functions 3.a and 3.b.	
		Declare High Pressure Coolant Injection (HPCI) System inoperable.	1 hour from discovery of loss of HPCI initiation capability
	<u>AND</u>		
	B.3	Place channel in trip.	24 hours

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CONDITION		REQUIRED ACTION	COMPLETION TIME
C. As required by Required Action A.1 and referenced in Table 3.3.5.1-1.	C.1	1. Only applicable in MODES 1, 2, and 3.	
		<ol> <li>2. Only applicable for Functions</li> <li>1.c, 1.e, 2.c,</li> <li>2.e, 2.g, 2.h,</li> <li>2.i, and 2.k.</li> </ol>	
		Declare supported feature(s) inoperable when its redundant feature ECCS initiation capability is inoperable.	1 hour from discovery of loss of initiation capability for feature(s) in both divisions
	<u>AND</u> C.2	Restore channel to OPERABLE status.	24 hours

(continued)

CONDITION		REQUIRED ACTION	COMPLETION TIME	
D. As required by Required Action A.1 and referenced in Table 3.3.5.1-1.	D.1	Only applicable if HPCI pump suction is not aligned to the suppression pool. Declare HPCI System inoperable.	1 hour from discovery of loss of HPCI initiation capability	
	AND			
	D.2.1	Place channel in trip.	24 hours	
	<u>OR</u>			
	D.2.2	Align the HPCI pump suction to the suppression pool.	24 hours	

(continued)

ACTIONS
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CONDITION		REQUIRED ACTION	COMPLETION TIME	
E. As required by Required Action A.1 and referenced in Table 3.3.5.1-1.	E.1	<ol> <li>NOTES</li> <li>Only applicable in MODES 1, 2, and 3.</li> <li>Only applicable for Functions 1.d and 2.f.</li> <li>Declare supported feature(s) inoperable when its redundant feature ECCS initiation capability is inoperable.</li> </ol>	l hour from discovery of loss of initiation capability for subsystems in both divisions	
	<u>AND</u> E.2	Restore channel to OPERABLE status.	7 days	

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ACTIONS	
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CONDITION		REQUIRED ACTION	COMPLETION TIME
F. As required by Required Action A.1 and referenced in Table 3.3.5.1-1.	F.1	Declare Automatic Depressurization System (ADS) valves inoperable.	1 hour from discovery of loss of ADS initiation capability in both trip systems
	<u>and</u>		
	F.2	Place channel in trip.	96 hours from discovery of inoperable channel concurrent with HPCI or isolation condenser (IC) inoperable
			AND
			8 days

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(continued)

Amendment No. 185/180

## ECCS Instrumentation 3.3.5.1

	CONDITION		REQUIRED ACTION COMPLETION			
G.	As required by Required Action A.1 and referenced in Table 3.3.5.1-1.	G.1	Declare ADS valves inoperable.	<pre>1 hour from discovery of loss of ADS initiation capability in both trip systems</pre>		
		<u>and</u>				
		G.2	Restore channel to OPERABLE status.	96 hours from discovery of inoperable channel concurrent with HPCI or IC inoperable		
				AND		
				8 days		
Η.	Required Action and associated Completion Time of Condition B, C, D, E, F, or G not met.	Н.1	Declare associated supported feature(s) inoperable.	Immediately		

### SURVEILLANCE REQUIREMENTS

	NOTES									
1.	. Refer to Table 3.3.5.1-1 to determine which SRs apply for each ECCS Function.									
2.	2. When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed as follows: (a) for up to 6 hours for Functions 3.c, 3.f, and 3.g; and (b) for up to 6 hours for Functions other than 3.c, 3.f, and 3.g provided the associated Function or the redundant Function maintains ECCS initiation capability.									
	SURVEILLANCE	FREQUENCY								
SR	3.3.5.1.1 Perform CHANNEL CHECK.	12 hours								
SR	3.3.5.1.2 Perform CHANNEL FUNCTIONAL TEST.	92 days								
SF	3.3.5.1.3 Calibrate the trip unit.	92 days								
SF	R 3.3.5.1.4 Perform CHANNEL CALIBRATION.	92 days								
SI	R 3.3.5.1.5 Perform CHANNEL CALIBRATION.	24 months								
SI	R 3.3.5.1.6 Perform LOGIC SYSTEM FUNCTIONAL TEST.	24 months								

		FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1.	Core	e Spray System					
	a.	Reactor Vessel Water Level - Low Low	1.2.3, 4 <sup>(a)</sup> .5 <sup>(a)</sup>	4 <sup>(b)</sup>	В	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.5 SR 3.3.5.1.6	<u>&gt;</u> -54.15 inches
	b.	Drywell Pressure - High	1.2.3	4 <sup>(b)</sup>	В	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	<u>≺</u> 1.81 psig
	c.	Reactor Steam Dome Pressure - Low (Permissive)	1,2,3	2	С	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	<u>&gt;</u> 308.5 psig and <u>&lt;</u> 341.7 psig
			4 <sup>(a)</sup> , 5 <sup>(a)</sup>	2	В	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	<u>&gt;</u> 308.5 psig and <u>&lt;</u> 341.7 psig
	d.	Core Spray Pump Discharge Flow - Low (Bypass)	1,2,3, 4 <sup>(a)</sup> , 5 <sup>(a)</sup>	l per pump	E	SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.5 SR 3.3.5.1.6	<u>&gt;</u> 802 gpm and <u>&lt;</u> 992 gpm
	e.	Core Spray Pump Start-Time Delay Relay	1, 2, 3 4 <sup>(a)</sup> , 5 <sup>(a)</sup>	l per pump	C	SR 3.3.5.1.5 SR 3.3.5.1.6	<u>≺</u> 13.8 secon
2.	Low lnj	Pressure Coolant ection (LPCI) System					
	a.	Reactor Vessel Water Level - Low Low	1,2,3. 4 <sup>(a)</sup> . 5 <sup>(a)</sup>	4	В	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.5 SR 3.3.5.1.6	<u>&gt;</u> -54.15 inches
	b.	Drywell Pressure - High	1,2,3	4	В	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	<u>≺</u> 1.81 psig
	c.	Reactor Steam Dome Pressure – Low (Permissive)	1,2,3	2	С	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	<u>&gt;</u> 308.5 psig and <u>≺</u> 341.7 psig
			4 <sup>(a)</sup> , 5 <sup>(a)</sup>	2	В	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	<u>&gt;</u> 308.5 psig and <u>&lt;</u> 341.7 psig
							(continu

#### Table 3.3.5.1-1 (page 1 of 5) Emergency Core Cooling System Instrumentation

(a) When associated ECCS subsystem(s) are required to be OPERABLE per LCO 3.5.2, "ECCS - Shutdown."

(b) Also required to initiate the associated diesel generator (DG).

	FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
2. LF	PCI System (continued)					
d.	. Reactor Steam Dome Pressure - Low (Break Detection)	1.2.3	4	В	SR 3.3.5.1.2 SR 3.3.5.1.5 SR 3.3.5.1.6	<u>&gt;</u> 802 psig and <u>&lt;</u> 898 psig
e.	. Low Pressure Coolant Injection Pump Start — Time Delay Relay Pumps B and D	1,2,3, 4 <sup>(a)</sup> , 5 <sup>(a)</sup>	l per pump	с	SR 3.3.5.1.5 SR 3.3.5.1.6	≤ 8.8 seconds
f.	. Low Pressure Coolant Injection Pump Discharge Flow - Low (Bypass)	1.2,3. 4 <sup>(a)</sup> . 5 <sup>(a)</sup>	1 per loop	E	SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.5 SR 3.3.5.1.6	<u>&gt;</u> 1107 gpm
g.	. Recirculation Pump Differential Pressure - High (Break Detection)	1,2,3	4 per pump	C	SR 3.3.5.1.2 SR 3.3.5.1.5 SR 3.3.5.1.6	<u>&lt;</u> 5.9 psid
h	. Recirculation Riser Differential Pressure - High (Break Detection)	1,2,3	4	С	SR 3.3.5.1.2 SR 3.3.5.1.5 SR 3.3.5.1.6	<u>≺</u> 2.0 psid
i.	. Recirculation Pump Differential Pressure Time Delay - Relay (Break Detection)	1,2,3	2	С	SR 3.3.5.1.5 SR 3.3.5.1.6	$\leq$ 0.53 seconds
j	. Reactor Steam Dome Pressure Time Delay - Relay (Break Detection)	1.2.3	2	В	SR 3.3.5.1.5 SR 3.3.5.1.6	<u>&lt;</u> 2.12 second:
k	. Recirculation Riser Differential Pressure Time Delay - Relay (Break Detection)	1,2,3	2	С	SR 3.3.5.1.5 SR 3.3.5.1.6	⊻ 0.53 second

#### Table 3.3.5.1–1 (page 2 of 5) Emergency Core Cooling System Instrumentation

(continued)

(a) When associated ECCS subsystem(s) are required to be OPERABLE per LCO 3.5.2.

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		FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
3.	Hig Inj	h Pressure Coolant ection (HPCI) System					
	a.	Reactor Vessel Water Level - Low Low	1. 2 <sup>(c)</sup> , 3 <sup>(c)</sup>	4	В	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.5 SR 3.3.5.1.6	<u>&gt;</u> -54.15 inches
	b.	Drywell Pressure - High	1, 2 <sup>(c)</sup> ,3 <sup>(c)</sup>	4	В	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	<u>≺</u> 1.81 psig
	c.	Reactor Vessel Water Level — High	1. 2 <sup>(c)</sup> . 3 <sup>(c)</sup>	2	С	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.5 SR 3.3.5.1.6	<u>≺</u> 46.2 inches
	d.	Contaminated Condensate Storage Tank (CCST) Level — Low	1, 2 <sup>(c)</sup> , 3 <sup>(c)</sup>	2 per CCST	D	SR 3.3.5.1.2 SR 3.3.5.1.5 SR 3.3.5.1.6	≥ 11.1158 ft for CCST 2/3 and ≥ 7.5637 ft for CCST 2/3 B
	e.	Suppression Pool Water Level - High	1. 2 <sup>(c)</sup> , 3 <sup>(c)</sup>	2	D	SR 3.3.5.1.2 SR 3.3.5.1.5 SR 3.3.5.1.6	<u>≺</u> 15 ft 5.625 inches
	f.	High Pressure Coolant Injection Pump Discharge Flow - Low (Bypass)	1, 2 <sup>(c)</sup> , 3 <sup>(c)</sup> .	1	E	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	<u>&gt;</u> 616 gpm
	g.	Manual Initiation	1. 2 <sup>(c)</sup> . 3 <sup>(c)</sup>	1	C	SR 3.3.5.1.6	NA

#### Table 3.3.5.1-1 (page 3 of 5) Emergency Core Cooling System Instrumentation

(continued)

(c) With reactor steam dome pressure > 150 psig.

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	FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
. A	Automatic Depressurization System (ADS) Trip System A					
ć	a. Reactor Vessel Water Level — Low Low	1. 2 <sup>(c)</sup> , 3 <sup>(c)</sup>	2	F	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.5 SR 3.3.5.1.6	≥ -54.15 inches
ł	b. Drywell Pressure - High	1, 2 <sup>(c)</sup> , 3 <sup>(c)</sup>	2	F	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	<u>≺</u> 1.81 psig
(	c. Automatic Depressurization System Initiation Timer	1. 2 <sup>(c)</sup> . 3 <sup>(c)</sup>	1	G	SR 3.3.5.1.5 SR 3.3.5.1.6	<u>≺</u> 113 second
(	d. Core Spray Pump Discharge Pressure - High	1, 2 <sup>(c)</sup> , 3 <sup>(c)</sup>	2	. G	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	<u>&gt;</u> 101.5 psig and <u>&lt;</u> 148.5 psig
	e. Low Pressure Coolant Injection Pump Discharge Pressure - High	1. 2 <sup>(c)</sup> , 3 <sup>(c)</sup>	4	G	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	<u>&gt;</u> 101.5 psig and <u>&lt;</u> 148.5 psig
	f. Automatic Depressurization System Low Low Water Level Actuation Timer	1. 2 <sup>(c)</sup> , 3 <sup>(c)</sup>	1	G	SR 3.3.5.1.5 SR 3.3.5.1.6	<u>≺</u> 580 secon

#### Table 3.3.5.1–1 (page 4 of 5) Emergency Core Cooling System Instrumentation

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(continued)

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(c) With reactor steam dome pressure > 150 psig.

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	FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
	DS Trip System B					
	. Reactor Vessel Water Level≁Low Low	1, 2 <sup>(c)</sup> , 3 <sup>(c)</sup>	2	F	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.5 SR 3.3.5.1.6	<u>&gt;</u> -54.15 inches
b	). Drywell Pressure-High	1, 2 <sup>(c)</sup> , 3 <sup>(c)</sup>	2	F	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	<u>≺</u> 1.81 psig
с	:. Automatic Depressurization System Initiation Timer	1, 2 <sup>(c)</sup> , 3 <sup>(c)</sup>	1	G	SR 3.3.5.1.5 SR 3.3.5.1.6	≤ 113 seconds
d	I. Core Spray Pump Discharge Pressure - High	1. 2 <sup>(c)</sup> . 3 <sup>(c)</sup>	2	G	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	<u>&gt;</u> 101.5 psig and <u>≺</u> 148.5 psig
e	e. Low Pressure Coolant Injection Pump Discharge Pressure - High	1, 2 <sup>(c)</sup> , 3 <sup>(c)</sup>	4	G	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	<u>&gt;</u> 101.5 psig and <u>&lt;</u> 148.5 psig
f	F. Automatic Depressurization System Low Low Water Level Actuation Timer	1, 2 <sup>(c)</sup> , 3 <sup>(c)</sup>	1	G	SR 3.3.5.1.5 SR 3.3.5.1.6	<u>≺</u> 580 second:

#### Table 3.3.5.1-1 (page 5 of 5) Emergency Core Cooling System Instrumentation

(c) With reactor steam dome pressure > 150 psig.

#### 3.3 INSTRUMENTATION

3.3.5.2 Isolation Condenser (IC) System Instrumentation

LCO 3.3.5.2 Four channels of Reactor Vessel Pressure-High instrumentation shall be OPERABLE.

APPLICABILITY: MODE 1, MODES 2 and 3 with reactor steam dome pressure > 150 psig.

#### ACTIONS

Separate Condition entry is allowed for each channel.

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	One or more Reactor Vessel Pressure-High channels inoperable.	A.1	Declare IC System inoperable.	1 hour from discovery of loss of IC initiation capability
		<u>AND</u> A.2	Place channel(s) in trip.	24 hours
Β.	Required Action and associated Completion Time not met.	B.1	Declare IC System inoperable.	Immediately

IC System Instrumentation 3.3.5.2

#### SURVEILLANCE REQUIREMENTS

When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours provided the Reactor Vessel Pressure-High Function maintains IC initiation capability.

<u></u>		SURVEILLANCE	FREQUENCY
SR	3.3.5.2.1	Perform CHANNEL FUNCTIONAL TEST.	31 days
SR	3.3.5.2.2	Not required for the time delay portion of the channel. Perform CHANNEL CALIBRATION. The Allowable Value shall be ≤ 1068 psig.	92 days
SR	3.3.5.2.3	Perform CHANNEL CALIBRATION for the time delay portion of the channel. The Allowable Value shall be $\leq$ 17 seconds.	24 months
SR	3.3.5.2.4	Perform LOGIC SYSTEM FUNCTIONAL TEST.	24 months

Primary Containment Isolation Instrumentation 3.3.6.1

#### 3.3 INSTRUMENTATION

3.3.6.1 Primary Containment Isolation Instrumentation

LCO 3.3.6.1 The primary containment isolation instrumentation for each Function in Table 3.3.6.1-1 shall be OPERABLE.

APPLICABILITY: According to Table 3.3.6.1-1.

#### ACTIONS

Separate Condition entry is allowed for each channel.

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	One or more required channels inoperable.	A.1	Place channel in trip.	12 hours for Functions 1.a, 2.a, 2.b, 5.b, and 6.b <u>AND</u> 24 hours for Functions other than Functions 1.a, 2.a, 2.b, 5.b, and 6.b
В.	One or more automatic Functions with isolation capability not maintained.	B.1	Restore isolation capability.	1 hour

(continued)

ACTIONS
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	CONDITION		REQUIRED ACTION	COMPLETION TIME
c.	Required Action and associated Completion Time of Condition A or B not met.	C.1	Enter the Condition referenced in Table 3.3.6.1-1 for the channel.	Immediately
D.	As required by Required Action C.1 and referenced in Table 3.3.6.1-1.	D.1 <u>OR</u>	Isolate associated main steam line (MSL).	12 hours
		D.2.1 <u>AN</u> [	Be in MODE 3. <u>D</u>	12 hours
		D.2.2	Be in MODE 4.	36 hours
E.	As required by Required Action C.1 and referenced in Table 3.3.6.1-1.	E.1	Be in MODE 2.	8 hours
F.	As required by Required Action C.1 and referenced in Table 3.3.6.1-1.	F.1	Isolate the affected penetration flow path(s).	l hour

(continued)

ACTI	ONS		······	
	CONDITION		REQUIRED ACTION	COMPLETION TIME
G.	Required Action and associated Completion Time for Condition F	G.1 Be in MODE 3. <u>AND</u>		12 hours
	not met. <u>OR</u>	G.2	Be in MODE 4.	36 hours
	As required by Required Action C.1 and referenced in Table 3.3.6.1-1.			
Η.	As required by Required Action C.1 and referenced in Table 3.3.6.1-1.	Н.1	Declare associated standby liquid control subsystem (SLC) inoperable.	1 hour
		<u>OR</u> H.2	Isolate the Reactor Water Cleanup System.	1 hour
Ι.	As required by Required Action C.1 and referenced in Table 3.3.6.1-1.	I.1	Initiate action to restore channel to OPERABLE status.	Immediately
		<u>OR</u> I.2	Initiate action to isolate the Shutdown Cooling System.	Immediately

Primary Containment Isolation Instrumentation 3.3.6.1

SURVEILLANCE REQUIREMENTS

## Refer to Table 3.3.6.1-1 to determine which SRs apply for each Primary Containment Isolation Function.

 When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours provided the associated Function maintains isolation capability.

		SURVEILLANCE	FREQUENCY
SR	3.3.6.1.1	Perform CHANNEL CHECK.	12 hours
SR	3.3.6.1.2	Perform CHANNEL FUNCTIONAL TEST.	92 days
SR	3.3.6.1.3	Calibrate the trip unit.	92 days
SR	3.3.6.1.4	Perform CHANNEL CALIBRATION.	92 days
SR	3.3.6.1.5	Perform CHANNEL FUNCTIONAL TEST.	24 months
SR	3.3.6.1.6	Perform CHANNEL CALIBRATION.	24 months
SR	3.3.6.1.7	Perform LOGIC SYSTEM FUNCTIONAL TEST.	24 months

		FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	CONDITIONS REFERENCED FROM REQUIRED ACTION C.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1.	Mai	n Steam Line Isolation					
	a.	Reactor Vessel Water Level — Low Low	1.2.3	2	D	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.3 SR 3.3.6.1.6 SR 3.3.6.1.7	<u>&gt;</u> -56.77 inches
	b.	Main Steam Line Pressure — Low	1	2	E	SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.7	<u>&gt;</u> 831 psig
	c.	Main Steam Line Pressure — Timer	1	2	E	SR 3.3.6.1.2 SR 3.3.6.1.6 SR 3.3.6.1.7	<pre>≤ 0.280 seconds (Unit 2) ≤ 0.236 seconds (Unit 3)</pre>
	d.	Main Steam Line Flow - High	1,2,3	2 per MSL	D	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.7	<u>&lt;</u> 160.5 psid (Unit 2) <u>&lt;</u> 117.1 psid (Unit 3)
	e.	Main Steam Line Tunnel Temperature - High	1,2.3	2 per trip string	D	SR 3.3.6.1.5 SR 3.3.6.1.6 SR 3.3.6.1.7	<u>&lt;</u> 200°F
2.		mary Containment lation					
	ð.	Reactor Vessel Water Level - Low	1,2,3	2	G	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.3 SR 3.3.6.1.6 SR 3.3.6.1.7	<u>&gt;</u> 10.24 inches
	b.	Drywell Pressure - High	1,2,3	2	6	SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.7	<u>≺</u> 1.94 psig
	c.	Drywell Radiation — High	1,2.3	- 1	F	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.6 SR 3.3.6.1.7	<u>≺</u> 77 R/hr

#### Table 3.3.6.1–1 (page 1 of 3) Primary Containment Isolation Instrumentation

(continued)

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Amendment No. 185/180

		FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	CONDITIONS REFERENCED FROM REQUIRED ACTION C.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
3.	Inj	h Pressure Coolant ection (HPCI) System lation					
	а.	HPCI Steam Line Flow — High	1.2.3	1	F	SR 3.3.6.1.2 SR 3.3.6.1.3 SR 3.3.6.1.6 SR 3.3.6.1.7	≤ 290.16% of rated steam flow (Unit 2) ≤ 288.23% of rated steam flow (Unit 3)
	b.	HPCI Steam Line Flow - Timer	1,2,3	1	F	SR 3.3.6.1.2 SR 3.3.6.1.6 SR 3.3.6.1.7	≥ 3.2 seconds and ≤ 8.8 seconds
	c.	HPCI Steam Supply Line Pressure - Low	1,2,3	2	F	SR 3.3.6.1.2 SR 3.3.6.1.3 SR 3.3.6.1.6 SR 3.3.6.1.7	<u>&gt;</u> 104 psig
	d.	HPCI Turbine Area Temperature - High	1,2,3	4(a)	F	SR 3.3.6.1.5 SR 3.3.6.1.6 SR 3.3.6.1.7	<u>≺</u> 189°F
4.		plation Condenser System Plation					
	a.	Steam Flow - High	1,2,3	1	F	SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.7	≤ 290.76% of rated steam flow
	b.	Return Flow - High	1,2,3	1	F	SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.7	≤ 30.2 inches water (Unit 2 ≤ 13.7 inches water (Unit 3

# Table 3.3.6.1–1 (page 2 of 3) Primary Containment Isolation Instrumentation

(continued)

(a) All four channels must be associated with a single trip string.

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	FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	CONDITIONS REFERENCED FROM REQUIRED ACTION C.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
5.	Reactor Water Cleanup System Isolation					
	a. SLC System Initiation	1,2	1	Н	SR 3.3.6.1.7	NA
	b. Reactor Vessel Water Level - Low	1,2.3	2	F	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.3 SR 3.3.6.1.6 SR 3.3.6.1.7	≥ 10.24 inches
•	Shutdown Cooling System Isolation					
	a. Recirculation Line Water Temperature - High	1,2,3	2	F	SR 3.3.6.1.2 SR 3.3.6.1.6 SR 3.3.6.1.7	<u>≺</u> 346°F
	b. Reactor Vessel Water Level - Low	3.4.5	2 <sup>(b)</sup>	I	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.3 SR 3.3.6.1.6 SR 3.3.6.1.7	≥ 10.24 inches

#### Table 3.3.6.1-1 (page 3 of 3) Primary Containment Isolation Instrumentation

(b) In MODES 4 and 5, provided Shutdown Cooling System integrity is maintained, only one channel per trip system with an isolation signal available to one shutdown cooling pump suction isolation valve is required.

Secondary Containment Isolation Instrumentation 3.3.6.2

#### 3.3 INSTRUMENTATION

3.3.6.2 Secondary Containment Isolation Instrumentation

LCO 3.3.6.2 The secondary containment isolation instrumentation for each Function in Table 3.3.6.2-1 shall be OPERABLE.

APPLICABILITY: According to Table 3.3.6.2-1.

#### ACTIONS

Separate Condition entry is allowed for each channel.

C	CONDITION		REQUIRED ACTION	COMPLETION TIME
A. One or inoper	r more channels rable.	A.1	Place channel in trip.	12 hours for Functions 1 and 2 <u>AND</u> 24 hours for Functions other than Functions 1 and 2
with capab	r more Functions isolation ility not ained.	B.1	Restore isolation capability.	l hour

(continued)

ACTIONS

	CONDITION		REQUIRED ACTION	COMPLETION TIME
С.	Required Action and associated Completion Time not met.	C.1.1	Isolate the associated penetration flow path.	l hour
		<u>OR</u>		
		C.1.2	Declare associated secondary containment isolation valves inoperable.	1 hour
		AND		
		C.2.1	Place the associated standby gas treatment (SGT) subsystem in operation.	l hour
		<u>0</u> R		
		C.2.2	Declare associated SGT subsystem inoperable.	1 hour

Secondary Containment Isolation Instrumentation 3.3.6.2

SURVEILLANCE REQUIREMENTS

 Refer to Table 3.3.6.2-1 to determine which SRs apply for each Secondary Containment Isolation Function.

2. When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours provided the associated Function maintains isolation capability.

SURVEILLANCEFREQUENCYSR 3.3.6.2.1Perform CHANNEL CHECK.12 hoursSR 3.3.6.2.2Perform CHANNEL FUNCTIONAL TEST.92 daysSR 3.3.6.2.3Calibrate the trip unit.92 daysSR 3.3.6.2.4Perform CHANNEL CALIBRATION.92 daysSR 3.3.6.2.5Perform CHANNEL CALIBRATION.24 monthsSR 3.3.6.2.6Perform LOGIC SYSTEM FUNCTIONAL TEST.24 months

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
I. Reactor Vessel Water Level-Low	1,2.3, (a)	2	SR 3.3.6.2.1 SR 3.3.6.2.2 SR 3.3.6.2.3 SR 3.3.6.2.5 SR 3.3.6.2.6	≥ 10.24 inches
2. Drywel} Pressure - High	1,2,3	2	SR 3.3.6.2.2 SR 3.3.6.2.4 SR 3.3.6.2.6	<u>≺</u> 1.94 psig
3. Reactor Building Exhaust Radiation — High	1,2,3. (a),(b)	2	SR 3.3.6.2.1 SR 3.3.6.2.2 SR 3.3.6.2.4 SR 3.3.6.2.6	<u>≺</u> 14.9 mR/hr
. Refueling Floor Radiation - High	1,2,3, (a),(b)	2	SR 3.3.6.2.1 SR 3.3.6.2.2 SR 3.3.6.2.4 SR 3.3.6.2.6	<u>≺</u> 100 mR/hr

#### Table 3.3.6.2-1 (page 1 of 1) Secondary Containment Isolation Instrumentation

(a) During operations with a potential for draining the reactor vessel.

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(b) During CORE ALTERATIONS and during movement of irradiated fuel assemblies in secondary containment.

#### 3.3 INSTRUMENTATION

3.3.6.3 Relief Valve Instrumentation

LCO 3.3.6.3 The relief valve instrumentation for each Function in Table 3.3.6.3-1 shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

#### ACTIONS

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	One relief valve inoperable due to inoperable channel(s).	A.1	Restore channel(s) to OPERABLE status.	14 days
В.	Required Action and associated Completion Time of Condition A not met. <u>OR</u>	B.1 <u>AND</u> B.2	Be in MODE 3. Be in MODE 4.	12 hours 36 hours
	Two or more relief valves inoperable due to inoperable channels.			

Relief Valve Instrumentation 3.3.6.3

SURVEILLANCE REQUIREMENTS

Refer to Table 3.3.6.3-1 to determine which SRs apply for each Function.

	FREQUENCY	
SR 3.3.6.3.1	Perform CHANNEL CALIBRATION.	92 days
SR 3.3.6.3.2	Perform CHANNEL CALIBRATION.	24 months
SR 3.3.6.3.3	Perform LOGIC SYSTEM FUNCTIONAL TEST.	24 months

Table 3.3.6.3-1 (page 1 of 1) Relief Valve Instrumentation

FUNCTION	REQUIRED CHANNELS PER FUNCTION	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Low Set Relief Valves			
a. Reactor Vessel Pressure Setpoint	l per valve	SR 3.3.6.3.1 SR 3.3.6.3.3	<u>≺</u> 1110.5 psig
b. Reactuation Time Delay	2 per valve	SR 3.3.6.3.2 SR 3.3.6.3.3	$\geq$ 8.5 seconds and $\leq$ 11.4 seconds
2. Relief Valves			
a. Reactor Vessel Pressure Setpoint	l per valve	SR 3.3.6.3.1 SR 3.3.6.3.3	<u>≺</u> 1133.5 psig

3.3 INSTRUMENTATION

3.3.7.1 Control Room Emergency Ventilation (CREV) System Instrumentation

LCO 3.3.7.1 Two channels of the Reactor Building Ventilation System-High High Radiation Alarm Function shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3, During movement of irradiated fuel assemblies in the secondary containment, During CORE ALTERATIONS, During operations with a potential for draining the reactor vessel (OPDRVs).

#### ACTIONS

# Separate Condition entry is allowed for each channel.

CONDITION		REQUIRED ACTION	COMPLETION TIME
A. One or more channels inoperable.	A.1	Declare CREV System inoperable.	<pre>1 hour from discovery of loss of CREV System Instrumentation alarm capability in both trip systems</pre>
	<u>AND</u> A.2	Restore channel to OPERABLE status.	6 hours

(continued)

CONDITION		REQUIRED ACTION		COMPLETION TIME
В.	Required Action and associated Completion Time not met.	B.1	Place the CREV System in the isolation/ pressurization mode of operation.	1 hour
		<u>OR</u> B.2	Declare CREV System inoperable.	1 hour

#### SURVEILLANCE REQUIREMENTS

When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours provided the CREV System Instrumentation alarm capability is maintained.

	FREQUENCY	
SR 3.3.7.1.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.7.1.2	Perform CHANNEL FUNCTIONAL TEST.	92 days
SR 3.3.7.1.3	Perform CHANNEL CALIBRATION. The Allowable Value shall be <u>&lt;</u> 14.9 mR/hr.	92 days

#### 3.3 INSTRUMENTATION

3.3.8.1 Loss of Power (LOP) Instrumentation

- LCO 3.3.8.1 The LOP instrumentation for each Function in Table 3.3.8.1-1 shall be OPERABLE.
- APPLICABILITY: MODES 1, 2, and 3, When the associated diesel generator is required to be OPERABLE by LCO 3.8.2, "AC Sources - Shutdown."

#### ACTIONS

Separate Condition entry is allowed for each channel.

CONDITION		REQUIRED ACTION		COMPLETION TIME
Α.	One or more channels inoperable.	A.1	Place channel in trip.	l hour
В.	Required Action and associated Completion Time not met.	В.1	Declare associated diesel generator (DG) inoperable.	Immediately

#### SURVEILLANCE REQUIREMENTS

1. Defen to Table 2.2.8 1-1 to determine which SRs apply for each LOP

- 1. Refer to Table 3.3.8.1-1 to determine which SRs apply for each LOP Function.
- 2. When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 2 hours provided the associated Function maintains LOP initiation capability.

		FREQUENCY	
SR	3.3.8.1.1	Perform CHANNEL FUNCTIONAL TEST.	18 months
SR	3.3.8.1.2	Perform CHANNEL CALIBRATION.	18 months
SR	3.3.8.1.3	Perform CHANNEL FUNCTIONAL TEST.	24 months
SR	3.3.8.1.4	Perform CHANNEL CALIBRATION.	24 months
SR	3.3.8.1.5	Perform LOGIC SYSTEM FUNCTIONAL TEST.	24 months

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#### Table 3.3.8.1-1 (page 1 of 1) Loss of Power Instrumentation

FUNCTION	REQUIRED CHANNELS PER BUS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
<ol> <li>4160 V Essential Service System Bus Undervoltage (Loss of Voltage)</li></ol>	2	SR 3.3.8.1.3 SR 3.3.8.1.4 SR 3.3.8.1.5	≥ 2796.85 V and ≤ 3063.20 V
a. Bus Undervoltage/Time Delay	2	SR 3.3:8.1.1 SR 3.3.8.1.2 SR 3.3.8.1.5	≥ 3861 V and ≤ 3911 V with time delay ≥ 5.7 seconds and ≤ 8.3 seconds
b. Time Delay (No LOCA)	1	SR 3.3.8.1.1 SR 3.3.8.1.2 SR 3.3.8.1.5	≥ 279 seconds and ≤ 321 seconds

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#### 3.3 INSTRUMENTATION

3.3.8.2 Reactor Protection System (RPS) Electric Power Monitoring

- Two RPS electric power monitoring assemblies shall be LCO 3.3.8.2 OPERABLE for each inservice RPS motor generator set or alternate power supply.
- MODES 1 and 2, APPLICABILITY: MODE 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies.

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ACTI	ONS				
CONDITION		REQUIRED ACTION		COMPLETION TIME	
Α.	One or both inservice power supplies with one electric power monitoring assembly inoperable.	A.1	Remove associated inservice power supply(s) from service.	72 hours	
В.	One or both inservice power supplies with both electric power monitoring assemblies inoperable.	B.1	Remove associated inservice power supply(s) from service.	1 hour	
С.	Required Action and associated Completion Time of Condition A or B not met in MODE 1 or 2.	C.1	Be in MODE 3.	12 hours	

(continued)

COMPLETION TIME REQUIRED ACTION CONDITION Immediately Initiate action to D.1 D. Required Action and fully insert all associated Completion insertable control Time of Condition A rods in core cells or B not met in MODE 5 containing one or with any control rod more fuel assemblies. withdrawn from a core cell containing one or more fuel assemblies.

SURVEILLANCE REQUIREMENTS

SURVEILLANCE			FREQUENCY	
SR	3.3.8.2.1	Only required to be performed prior to entering MODE 2 from MODE 3 or 4, when in MODE 4 for $\geq$ 24 hours.		
		Perform CHANNEL FUNCTIONAL TEST.	184 days	
SR	3.3.8.2.2	<ul> <li>Perform CHANNEL CALIBRATION. The Allowable Values shall be:</li> <li>a. Overvoltage ≤ 128.6 V, with time delay set to ≤ 3.9 seconds.</li> <li>b. Undervoltage ≥ 106.3 V, with time delay set to ≤ 3.9 seconds.</li> <li>c. Underfrequency ≥ 55.7 Hz, with time delay set to ≤ 3.9 seconds.</li> </ul>	24 months	
SR	3.3.8.2.3	Perform a system functional test.	24 months	

#### 3.4 REACTOR COOLANT SYSTEM (RCS)

#### 3.4.1 Recirculation Loops Operating

LCO 3.4.1 Two recirculation loops with matched flows shall be in operation.

OR

One recirculation loop shall be in operation with the following limits applied when the associated LCO is applicable:

- a. LCO 3.2.1, "AVERAGE PLANAR LINEAR HEAT GENERATION RATE (APLHGR)," single loop operation limits specified in the COLR;
- b. LCO 3.2.2, "MINIMUM CRITICAL POWER RATIO (MCPR)," single loop operation limits specified in the COLR;
  - c. LCO 3.3.1.1, "Reactor Protection System (RPS) Instrumentation," Function 2.b (Average Power Range Monitors Flow Biased Neutron Flux-High), Allowable Value of Table 3.3.1.1-1 is reset for single loop operation; and
- d. LCO 3.3.2.1, "Control Rod Block Instrumentation," Function 1.a (Rod Block Monitor-Upscale), Allowable Value of Table 3.3.2.1-1 is reset for single loop operation.

APPLICABILITY: MODES 1 and 2.

<u></u>	CONDITION		REQUIRED ACTION	COMPLETION TIME
A. No in	recirculation loops operation.	A.1 <u>AND</u>	Be in MODE 2.	8 hours
		A.2	Be in MODE 3.	12 hours

ACTIONS

(continued)

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CONDITION		REQUIRED ACTION		COMPLETION TIME
Β.	Recirculation loop flow mismatch not within limits.	B.1	Declare the recirculation loop with lower flow to be "not in operation."	2 hours
С.	Requirements of the LCO not met for reasons other than Condition A or B.	C.1	Satisfy the requirements of the LCO.	24 hours
D.	Required Action and associated Completion Time of Condition C not met.	D.1	Be in MODE 3.	12 hours

#### SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.4.1.1 Not required to be performed until 24 hours after both recirculation loops are in operation. Verify jet pump loop flow mismatch with both recirculation loops in operation is: a. ≤ 10% of rated core flow when operating at < 70% of rated core flow; and b. ≤ 5% of rated core flow when operating at ≥ 70% of rated core flow.	24 hours .

3.4.2 Jet Pumps

LCO 3.4.2 All jet pumps shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

#### ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more jet pumps inoperable.	A.1 Be in MODE 3.	12 hours

## SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.4.2.1	<ul> <li>Not required to be performed until 4 hours after associated recirculation loop is in operation.</li> <li>Not required to be performed until 24 hours after &gt; 25% RTP.</li> <li>Verify at least one of the following criteria (a or b) is satisfied for each operating recirculation loop:</li> <li>a. Recirculation pump flow to speed ratio differs by ≤ 10% from established patterns.</li> <li>b. Each jet pump flow differs by ≤ 10% from established patterns.</li> </ul>	24 hours

Dresden 2 and 3

# 3.4.3 Safety and Relief Valves

LCO 3.4.3 The safety function of 8 safety valves shall be OPERABLE.

The relief function of 5 relief valves shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	One relief valve inoperable.	A.1	Restore the relief valve to OPERABLE status.	14 days
в.	Required Action and associated Completion Time of Condition A	B.1 <u>AND</u>	Be in MODE 3.	12 hours
	not met. <u>OR</u>	B.2	Be in MODE 4.	36 hours
	Two or more relief valves inoperable.			
	<u>OR</u>			
	One or more safety valves inoperable.			

	SURVEILLANCE		FREQUENCY
SR 3.4.3.1	of the safety valves		In accordance with the Inservice
	Number of <u>Safety Valves</u>	Setpoint <u>(psig)</u>	Testing Program
·	2 2 4	$\begin{array}{rrrrrrrrrrrrrrrrrrrrrrrrrrrrrrrrrrrr$	
SR 3.4.3.2	Not required to be p	OTE erformed until 12 hours pressure and flow are the test.	
	Verify each relief v manually actuated.	alve opens when	24 months
SR 3.4.3.3	N Valve actuation may	OTE be excluded.	
	Verify each relief v actual or simulated signal.	alve actuates on an automatic initiation	24 months

## 3.4.4 RCS Operational LEAKAGE

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- RCS operational LEAKAGE shall be limited to: LCO 3.4.4
  - No pressure boundary LEAKAGE; a.
  - $\leq$  5 gpm unidentified LEAKAGE; b.
  - $\leq$  25 gpm total LEAKAGE averaged over the previous 24 hour period; and с.
  - 2 gpm increase in unidentified LEAKAGE within the d. previous 24 hour period in MODE 1.

APPLICABILITY: MODES 1, 2, and 3.

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	Unidentified LEAKAGE not within limit. <u>OR</u> Total LEAKAGE not within limit.	A.1	Reduce LEAKAGE to within limits.	4 hours
В.	Unidentified LEAKAGE increase not within limit.	В.1 <u>OR</u>	Reduce unidentified LEAKAGE increase to within limits.	4 hours (continued)

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	CONDITION		REQUIRED ACTION	COMPLETION TIME
В.	(continued)	В.2	Verify source of unidentified LEAKAGE increase is not intergranular stress corrosion cracking susceptible material.	4 hours
с.	Required Action and associated Completion Time of Condition A or B not met. <u>OR</u> Pressure boundary LEAKAGE exists.	C.1 <u>AND</u> C.2	Be in MODE 3. Be in MODE 4.	12 hours 36 hours

	SURVEILLANCE	FREQUENCY
SR 3.4.4.1	Verify RCS unidentified and total LEAKAGE and unidentified LEAKAGE increase are within limits.	12 hours

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3.4.5 RCS Leakage Detection Instrumentation

- LCO 3.4.5 The following RCS leakage detection instrumentation shall be OPERABLE:
  - a. Drywell floor drain sump monitoring system; and
  - b. Primary containment atmospheric particulate sampling system.

APPLICABILITY: MODES 1, 2, and 3.

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	Drywell floor drain sump monitoring system inoperable.	A.1	Restore drywell floor drain sump monitoring system to OPERABLE status.	24 hours
В.	Primary containment atmospheric particulate sampling system inoperable.	B.1	Restore primary containment atmospheric particulate sampling system to OPERABLE status.	24 hours
С.	Required Action and associated Completion Time not met.	C.1 <u>AND</u>	Be in MODE 3.	12 hours
		C.2	Be in MODE 4.	36 hours

SURV	EILLANCE RE	QUIREMENTS	
<u></u>		SURVEILLANCE	FREQUENCY
SR	3.4.5.1	Perform primary containment atmospheric particulate sampling.	12 hours
SR	3.4.5.2	Perform a CHANNEL FUNCTIONAL TEST of drywell floor drain sump monitoring system instrumentation.	31 days
SR	3.4.5.3	Perform a CHANNEL CALIBRATION of drywell floor drain sump monitoring system instrumentation.	12 months

# 3.4.6 RCS Specific Activity

- LCO 3.4.6 The specific activity of the reactor coolant shall be limited to DOSE EQUIVALENT I-131 specific activity  $\leq$  0.2  $\mu$ Ci/gm.
- APPLICABILITY: MODE 1, MODES 2 and 3 with any main steam line not isolated.

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	Reactor coolant specific activity > 0.2 $\mu$ Ci/gm and $\leq$ 4.0 $\mu$ Ci/gm DOSE EQUIVALENT I-131.		A is not applicable. Determine DOSE EQUIVALENT I-131. Restore DOSE	Once per 4 hours 48 hours
			EQUIVALENT I-131 to within limits.	
В.	Required Action and associated Completion Time of Condition A not met.	B.1 <u>AND</u>	Determine DOSE EQUIVALENT I-131.	Once per 4 hours
	<u>0R</u>	B.2.1	Isolate all main steam lines.	12 hours
	Reactor Coolant specific activity > 4.0 µCi/gm DOSE EQUIVALENT I-131.	<u>OR</u>	7	
				(continued)

CTION COMPLETION TIM	REQUIRED ACTION	CONDITION
E 3. 12 hours	B.2.2.1 Be in MODE 3.	. (continued)
	AND	
E 4. 36 hours	B.2.2.2 Be in MODE 4.	
E 4. 36 hours	B.2.2.2 Be in MODE 4.	

	SURVEILLANCE	FREQUENCY
SR 3.4.6.1	Only required to be performed in MODE 1. Verify reactor coolant DOSE EQUIVALENT I-131 specific activity is $\leq$ 0.2 µCi/gm.	7 days

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3.4.7 Shutdown Cooling (SDC) System-Hot Shutdown

LCO 3.4.7 Two SDC subsystems shall be OPERABLE, and, with no recirculation pump in operation, at least one SDC subsystem shall be in operation.
1. Both required SDC subsystems and recirculation pumps may be not in operation for up to 2 hours per 8 hour period.
2. One required SDC subsystem may be inoperable for up to 2 hours for the performance of Surveillances.

ACTIONS

LCO 3.0.4 is not applicable.

2. Separate Condition entry is allowed for each SDC subsystem.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or two required SDC subsystems inoperable.	A.1 Initiate action to restore required SDC subsystem(s) to OPERABLE status.	Immediately
	AND	
		(continued)

_	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	(continued)	A.2	Verify an alternate method of decay heat removal is available for each inoperable required SDC subsystem.	1 hour
		<u>AND</u>		
		A.3	Be in MODE 4.	24 hours
в.	No required SDC subsystem in operation.	B.1	Initiate action to restore one required SDC subsystem or one recirculation pump to operation.	Immediately
	AND	AND		
	No recirculation pump in operation.	B.2	Verify reactor coolant circulation by an alternate method.	l hour from discovery of no reactor coolant circulation
				AND
			• •	Once per 12 hours thereafter
		AND		
		B.3	Monitor reactor coolant temperature and pressure.	Once per hour

	SURVEILLANCE	FREQUENCY
SR 3.4.7.1	Not required to be met until 2 hours after reactor vessel coolant temperature is less than the SDC cut-in permissive temperature. Verify one SDC subsystem or recirculation pump is operating.	12 hours

3.4.8 Shutdown Cooling (SDC) System-Cold Shutdown

LCO 3.4.8 Two SDC subsystems shall be OPERABLE, and, with no recirculation pump in operation, at least one SDC subsystem shall be in operation.
1. Both required SDC subsystems may be not in operation during hydrostatic testing.

- Both required SDC subsystems and recirculation pumps may be not in operation for up to 2 hours per 8 hour period.
- One required SDC subsystem may be inoperable for up to 2 hours for the performance of Surveillances.

APPLICABILITY: MODE 4.

#### ACTIONS

Separate Condition entry is allowed for each shutdown cooling subsystem.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or two required SDC subsystems inoperable.	A.1 Verify an alternate method of decay heat removal is available for each inoperable required SDC subsystem.	l hour <u>AND</u> Once per 24 hours thereafter

(continued)

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ACTIONS
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	CONDITION		REQUIRED ACTION	COMPLETION TIME
В.	No required SDC subsystem in operation. <u>AND</u> No recirculation pump in operation.	B.1	Verify reactor coolant circulating by an alternate method.	1 hour from discovery of no reactor coolant circulation <u>AND</u> Once per 12 hours thereafter
		<u>AND</u> B.2	Monitor reactor coolant temperature and pressure.	Once per hour

	SURVEILLANCE	FREQUENCY
SR 3.4.8.1	Verify one SDC subsystem or recirculation pump is operating.	12 hours ,

3.4.9 RCS Pressure and Temperature (P/T) Limits

LCO 3.4.9 RCS pressure, RCS temperature, RCS heatup and cooldown rates, and the recirculation pump starting temperature requirements shall be maintained within limits.

# APPLICABILITY: At all times.

#### ACTIONS

CONDITION		REQUIRED ACTION		COMPLETION TIME	
Α.	Required Action A.2 shall be completed if this Condition is entered. Requirements of the LCO not met in MODE 1, 2, or 3.	A.1 <u>AND</u> A.2	Restore parameter(s) to within limits. Determine RCS is acceptable for continued operation.	30 minutes 72 hours	
В.	Required Action and associated Completion Time of Condition A not met.	B.1 <u>AND</u> B.2	Be in MODE 3. Be in MODE 4.	12 hours 36 hours	

CONDITION		REQUIRED ACTION		COMPLETION TIME	
С.	Required Action C.2 shall be completed if this Condition is entered.	C.1 <u>AND</u>	Initiate action to restore parameter(s) to within limits.	Immediately	
	Requirements of the LCO not met in other than MODES 1, 2, and 3.	C.2	Determine RCS is acceptable for operation.	Prior to entering MODE 2 or 3	

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	SURVEILLANCE	FREQUENCY	
SR 3.4.9.1	Only required to be performed during RCS heatup and cooldown operations and RCS inservice leak and hydrostatic testing.		
	Verify:	30 minutes	
	a. RCS pressure and RCS temperature are within the applicable limits specified in Figures 3.4.9-1, 3.4.9-2, and 3.4.9-3;		
	b. RCS heatup and cooldown rates are $\leq$ 100°F in any 1 hour period; and		
	c. RCS temperature change during inservice leak and hydrostatic testing is ≤ 20°F in any 1 hour period when the RCS temperature and pressure are being maintained within the limits of Figure 3.4.9-1.		
SR 3.4.9.2	Verify RCS pressure and RCS temperature are within the applicable criticality limits specified in Figure 3.4.9-3.	Once within 15 minutes prior to control rod withdrawal for the purpose of achieving criticality	

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		SURVEILLANCE	FREQUENCY
SR	3.4.9.3	NOTE- Only required to be met in MODES 1, 2, 3, and 4 during recirculation pump startup. Verify the difference between the bottom head coolant temperature and the reactor pressure vessel (RPV) coolant temperature is $\leq$ 145°F.	Once within 15 minutes prior to each startup of a recirculation pump
SR	3.4.9.4	Only required to be met in MODES 1, 2, 3, and 4 during recirculation pump startup. Verify the difference between the reactor coolant temperature in the recirculation loop to be started and the RPV coolant temperature is $\leq$ 50°F.	Once within 15 minutes prior to each startup of a recirculation pump
SR	3.4.9.5	Only required to be performed when tensioning the reactor vessel head bolting studs. Verify reactor vessel flange and head flange temperatures are ≥ 83°F.	30 minutes

<u></u> .		SURVEILLANCE	FREQUENCY
SR	3.4.9.6	Not required to be performed until 30 minutes after RCS temperature <u>&lt;</u> 93°F in MODE 4.	
		Verify reactor vessel flange and head flange temperatures are <u>&gt;</u> 83°F.	30 minutes
SR	3.4.9.7	Not required to be performed until 12 hours after RCS temperature <u>&lt;</u> 113°F in MODE 4.	
		Verify reactor vessel flange and head flange temperatures are <u>&gt;</u> 83°F.	12 hours

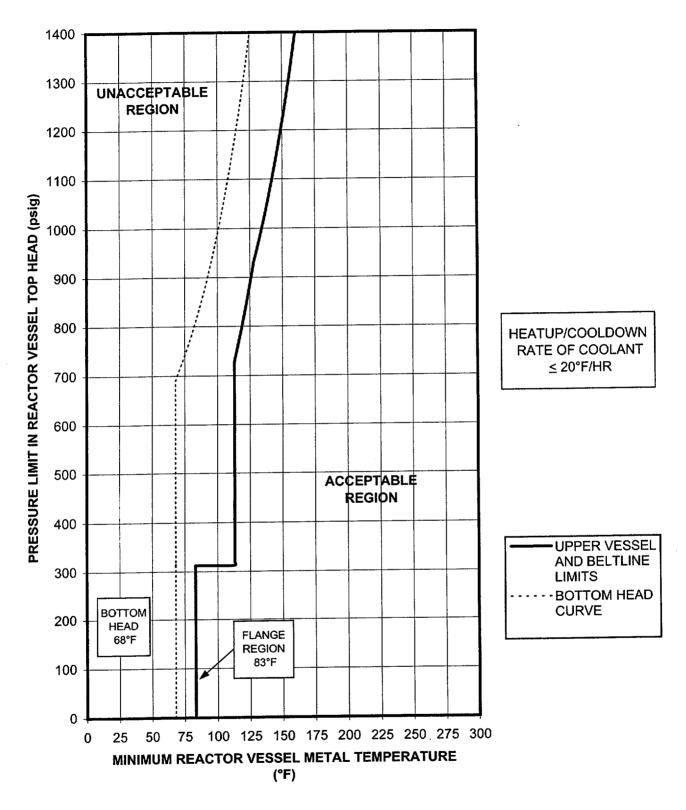


Figure 3.4.9-1 (Page 1 of 1) Non-Nuclear Inservice Leak and Hydrostatic Testing Curve (Valid to 32 EFPY)

Dresden 2 and 3

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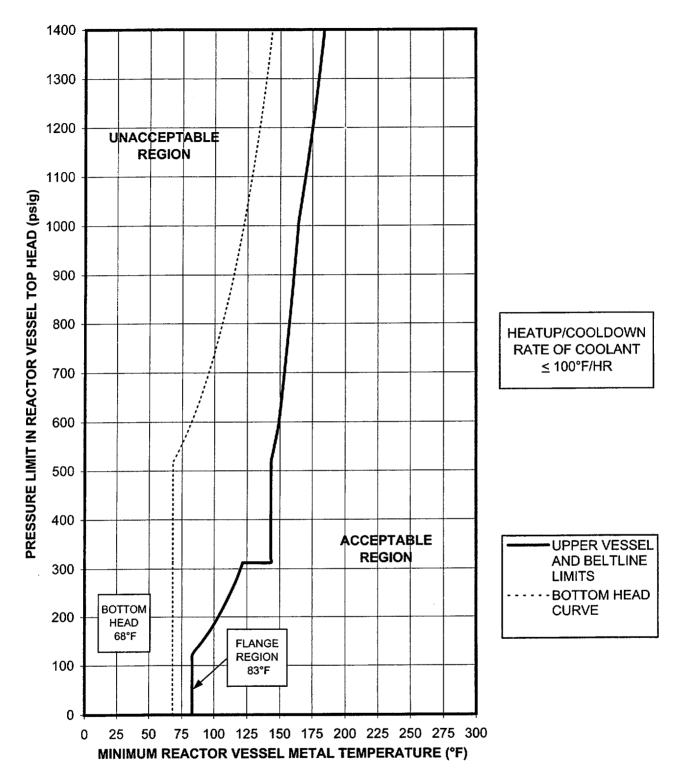


Figure 3.4.9-2 (Page 1 of 1) Non-Nuclear Heatup/Cooldown Curve (Valid to 32 EFPY)

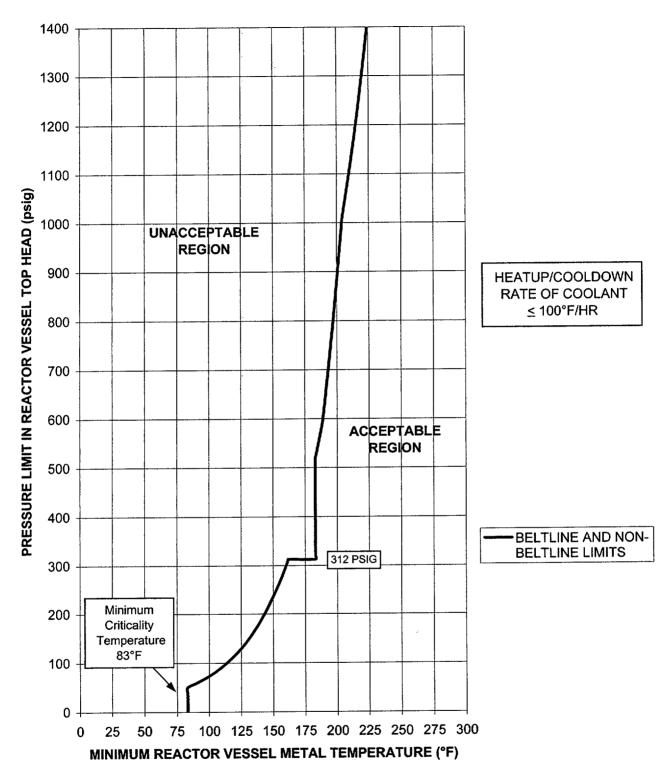


Figure 3.4.9-3 (Page 1 of 1) Critical Operations Curve (Valid to 32 EFPY)

## 3.4.10 Reactor Steam Dome Pressure

LCO 3.4.10 The reactor steam dome pressure shall be  $\leq$  1005 psig.

APPLICABILITY: MODES 1 and 2.

### ACTIONS

	CONDITION	REQUIRED ACTION		COMPLETION TIME
Α.	Reactor steam dome pressure not within limit.	A.1	Restore reactor steam dome pressure to within limit.	15 minutes
в.	Required Action and associated Completion Time not met.	B.1	Be in MODE 3.	12 hours

### SURVEILLANCE REQUIREMENTS

	FREQUENCY	
SR 3.4.10.1	Verify reactor steam dome pressure is <u>≺</u> 1005 psig.	12 hours

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3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS) AND ISOLATION CONDENSER (IC) SYSTEM

## 3.5.1 ECCS-Operating

- LCO 3.5.1 Each ECCS injection/spray subsystem and the Automatic Depressurization System (ADS) function of four relief valves shall be OPERABLE.
- APPLICABILITY: MODE 1, MODES 2 and 3, except high pressure coolant injection (HPCI) and ADS valves are not required to be OPERABLE with reactor steam dome pressure  $\leq$  150 psig.

CONDITION		REQUIRED ACTION	COMPLETION TIME
w Pressure t Injection pump able.	A.1	Restore LPCI pump to OPERABLE status.	30 days
CI subsystem able for reasons than Condition	B.1	Restore low pressure ECCS injection/spray subsystem to OPERABLE status.	7 days
ere Spray tem inoperable.			
PCI pump in each stem inoperable.	C.1	Restore one LPCI pump to OPERABLE status.	7 days
	w Pressure t Injection pump able. CI subsystem able for reasons than Condition re Spray tem inoperable.	w Pressure t Injection pump able. CI subsystem able for reasons than Condition re Spray tem inoperable. CI pump in each C.1	w Pressure t Injection pump able.A.1Restore LPCI pump to OPERABLE status.CI subsystem able for reasons than ConditionB.1Restore low pressure ECCS injection/spray subsystem to OPERABLE status.re Spray tem inoperable.C.1Restore one LPCI pump

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	ONS		COMPLETION TIME	
CONDITION			REQUIRED ACTION	
D.	Two LPCI subsystems inoperable for reasons other than Condition C.	D.1	Restore one LPCI subsystem to OPERABLE status.	72 hours
Ε.	associated Completion	E.1	Be in MODE 3.	12 hours
	Time of Condition A, B, C, or D not met.	<u>AND</u> E.2	Be in MODE 4.	36 hours
	HPCI System inoperable.	F.1	Verify by administrative means IC System is OPERABLE.	Immediately
		<u>AND</u>		
		F.2	Restore HPCI System to OPERABLE status.	14 days
G.	HPCI System inoperable.	G.1	Restore HPCI System to OPERABLE status.	72 hours
	AND	<u> </u>		
	One low pressure ECCS injection/spray subsystem is inoperable or Condition C entered.	G.2	Restore low pressure ECCS injection/spray subsystem(s) to OPERABLE status.	72 hours
н.	One required ADS valve inoperable.	Н.1	Restore ADS valve to OPERABLE status.	14 days

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Dresden 2 and 3

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	CONDITION	REQUIRED ACTION		COMPLETION TIME
Ι.	Required Action and associated Completion Time of Condition F, G, or H not met. <u>OR</u> Two or more required ADS valves inoperable.	I.1 <u>AND</u> I.2	Be in MODE 3. Reduce reactor steam dome pressure to ≤ 150 psig.	12 hours 36 hours
J.	Two or more low pressure ECCS injection/spray subsystems inoperable for reasons other than Condition C or D. <u>OR</u> HPCI System and one or more required ADS valves inoperable. <u>OR</u> One or more low pressure ECCS injection/spray subsystems inoperable and one or more required ADS valves inoperable.	J.1	Enter LCO 3.0.3.	Immediately

		SURVEILLANCE	·	FREQUENCY
SR	3.5.1.1	Verify, for each ECCS injection/spra subsystem, the piping is filled with from the pump discharge valve to the injection valve.	h water	31 days
SR	3.5.1.2	Verify each ECCS injection/spray su manual, power operated, and automat in the flow path, that is not locked sealed, or otherwise secured in pos- is in the correct position.	31 days	
SR	3.5.1.3	Verify correct breaker alignment to LPCI swing bus.	the	31 days
SR	3.5.1.4	Verify each recirculation pump disc valve cycles through one complete c full travel or is de-energized in t closed position.	ycle of	In accordance with the Inservice Testing Program
SR	3.5.1.5	Verify the following ECCS pumps deve specified flow rate against a test pressure corresponding to the speci- reactor pressure. TEST L PRESSU NO. CORRES OF TO A R SYSTEM FLOW RATE PUMPS PRESSU Core	In accordance with the Inservice Testing Program	
		Core Spray ≥ 4500 gpm 1 ≥ 90 p LPCI ≥ 14,500 gpm 3 ≥ 20 p		

		SURVEILLANCE	FREQUENCY
SR	3.5.1.6	Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test.	
		Verify, with reactor pressure $\leq$ 1005 and $\geq$ 920 psig, the HPCI pump can develop a flow rate $\geq$ 5000 gpm against a system head corresponding to reactor pressure.	In accordance with the Inservice Testing Program
SR	3.5.1.7	Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test.	
		Verify, with reactor pressure $\leq$ 180 psig, the HPCI pump can develop a flow rate $\geq$ 5000 gpm against a system head corresponding to reactor pressure.	24 months
SR	3.5.1.8	NOTE Vessel injection/spray may be excluded.	
		Verify each ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal.	24 months

•••		SURVEILLANCE	FREQUENCY
SR	3.5.1.9	Valve actuation may be excluded. Verify the ADS actuates on an actual or simulated automatic initiation signal.	24 months
SR	3.5.1.10	Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. Verify each required ADS valve opens when manually actuated.	24 months
SR	3.5.1.11	Verify automatic transfer capability of the LPCI swing bus power supply from the normal source to the backup source.	24 months

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS) AND ISOLATION CONDENSER (IC) SYSTEM

- 3.5.2 ECCS Shutdown
- LCO 3.5.2 Two low pressure ECCS injection/spray subsystems shall be OPERABLE.
- APPLICABILITY: MODE 4, MODE 5, except with the spent fuel storage pool gates removed and water level  $\geq$  23 ft over the top of the reactor pressure vessel flange.

ACTIONS

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	One required ECCS injection/spray subsystem inoperable.	A.1	Restore required ECCS injection/spray subsystem to OPERABLE status.	4 hours
В.	Required Action and associated Completion Time of Condition A not met.	B.1	Initiate action to suspend operations with a potential for draining the reactor vessel (OPDRVs).	Immediately
С.	Two required ECCS injection/spray subsystems inoperable.	C.1 <u>AND</u>	Initiate action to suspend OPDRVs.	Immediately
		C.2	Restore one required ECCS injection/spray subsystem to OPERABLE status.	4 hours

ACT	I	ONS	
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	CONDITION		REQUIRED ACTION	COMPLETION TIME
D.	Required Action C.2 and associated Completion Time not met.	D.1	Initiate action to restore secondary containment to OPERABLE status.	
		<u>and</u>		
		D.2	Initiate action to restore one standby gas treatment subsystem to OPERABLE status.	Immediately
		<u>and</u>		
		D.3	Initiate action to restore isolation capability in each required secondary containment penetration flow path not isolated.	Immediately

		SURVEILLANCE	FREQUENCY
SR 3.5	.2.1	<pre>Verify, for each required ECCS injection/ spray subsystem, the: a. Suppression pool water level is</pre>	12 hours
SR 3.5	.2.2	Verify, for each required ECCS injection/ spray subsystem, the piping is filled with water from the pump discharge valve to the injection valve.	31 days
SR 3.5	.2.3	Verify each required ECCS injection/spray subsystem manual, power operated, and automatic valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position.	31 days

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<u>2</u>		SURVEILLANCE	FREQUENCY
SR 3	3.5.2.4	Verify each required ECCS pump develops the specified flow rate against a test line pressure corresponding to the specified reactor pressure.TEST LINE PRESSURE NO. CORRESPONDING OF TO A REACTORSYSTEM FLOW RATEPUMPS PRESSURE OFPRESSURE OFCS $\geq$ 4500 gpm1 $\geq$ 90 psig $\geq$ 20 psigLPCI $\geq$ 4500 gpm1 $\geq$ 20 psig	In accordance with the Inservice Testing Program
SR 3	3.5.2.5	Versel injection/spray may be excluded. Verify each required ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal.	24 months

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS) AND ISOLATION CONDENSER (IC) SYSTEM 3.5.3 IC System

LCO 3.5.3 The IC System shall be OPERABLE.

APPLICABILITY: MODE 1, MODES 2 and 3 with reactor steam dome pressure > 150 psig.

ACTI	ONS				
	CONDITION	REQUIRED ACTION		COMPLETION TIME	
Α.	IC System inoperable.	A.1	Verify by administrative means High Pressure Coolant Injection System is OPERABLE.	Immediately	
		<u>AND</u>			
		A.2	Restore IC System to OPERABLE status.	14 days	
assoc	Required Action and associated Completion	B.1	Be in MODE 3.	12 hours	
	Time not met.	<u>and</u>			
		B.2	Reduce reactor steam dome pressure to <u>≺</u> 150 psig.	36 hours	

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SURVEILLANCE REQUIREMENTS

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	FREQUENCY	
SR 3.5	.3.1 Verify the IC System: a. Shellside water level ≥ 6 feet; and b. Shellside water temperature ≤ 210°F.	24 hours
SR 3.5	.3.2 Verify each IC System manual, power operated, and automatic valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position.	31 days
SR 3.5	.3.3 Verify the IC System actuates on an actual or simulated automatic initiation signal.	24 months
SR 3.5	.3.4 Verify IC System heat removal capability to remove design heat load.	60 months

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### 3.6 CONTAINMENT SYSTEMS

3.6.1.1 Primary Containment

LCO 3.6.1.1 Primary containment shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

	CONDITION	REQUIRED ACTION		COMPLETION TIME
Α.	Primary containment inoperable.	A.1	Restore primary containment to OPERABLE status.	1 hour
в.	Required Action and associated Completion Time not met.	B.1 <u>AND</u>	Be in MODE 3.	12 hours
		B.2	Be in MODE 4.	36 hours

		SURVEILLANCE	FREQUENCY
SR	3.6.1.1.1	Perform required visual examinations and leakage rate testing except for primary containment air lock testing, in accordance with the Primary Containment Leakage Rate Testing Program.	In accordance with the Primary Containment Leakage Rate Testing Program
SR	3.6.1.1.2	Verify drywell-to-suppression chamber bypass leakage is ≤ 2% of the acceptable A/√k design value of 0.18 ft² at an initial differential pressure of ≥ 1.0 psid.	24 months <u>AND</u> NOTE Only required after two consecutive tests fail and continues until two consecutive tests pass  12 months

Primary Containment Air Lock 3.6.1.2

3.6	CONTAINMENT	SYSTEMS		
3.6	.1.2 Primary	Containment	Air Lock	
LCO	3.6.1.2	The primary	containment air lock shall be O	PERABLE.
APPI	_ICABILITY:	MODES 1, 2,	and 3.	
ACT	IONS			
			NOTES	
			sible to perform repairs of the	
2.	Containment,	"when air lo	ons and Required Actions of LCO ock leakage results in exceeding acceptance criteria.	3.6.1.1, "Primary overall
	CONDITI	ON	REQUIRED ACTION	COMPLETION TIME

A. One primary containment air lock door inoperable.	<ul> <li>NOTES</li> <li>Required Actions A.1,</li> <li>A.2, and A.3 are not applicable if both doors in the air lock are inoperable and Condition C is entered.</li> </ul>	
	2. Entry and exit is permissible for 7 days under administrative controls.	
	A.1 Verify the OPERABLE door is closed.	1 hour
	AND	
		(continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.2 Lock the OPERABLE door closed. AND	24 hours
	A.3 Air lock doors in high radiation areas or areas with limited access due to inerting may be verified locked closed by administrative means.	
	Verify the OPERABLE door is locked closed.	Once per 31 days
B. Primary containment air lock interlock mechanism inoperable.	<ol> <li>Required Actions B.1, B.2, and B.3 are not applicable if both doors in the air lock are inoperable and Condition C is entered.</li> <li>Entry into and exit from primary containment is permissible under the</li> </ol>	
	control of a dedicated individual. B.1 Verify an OPERABLE	1 hour
	door is closed. <u>AND</u>	
		(continued)

ACTIONS

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Β.	(continued)	B.2	Lock an OPERABLE door closed.	24 hours
		AND		
		В.3	Air lock doors in high radiation areas or areas with limited access due to inerting may be verified locked closed by administrative means.	
			Verify an OPERABLE door is locked closed.	Once per 31 days
С.	Primary containment air lock inoperable for reasons other than Condition A or B.	C.1	Initiate action to evaluate primary containment overall leakage rate per LCO 3.6.1.1, using current air lock test results.	Immediately
		<u>and</u>		
		C.2	Verify a door is closed.	l hour
		<u>and</u>		
		C.3	Restore air lock to OPERABLE status.	24 hours

(continued)

CONDITI	ON	REQUIRED ACTION	COMPLETION TIME
D. Required Act		Be in MODE 3.	12 hours
associated ( Time not met			
	D.2	Be in MODE 4.	36 hours

<u></u>	SURVEILLANCE	FREQUENCY
SR 3.6.1.2.1	<ol> <li>An inoperable air lock door does not invalidate the previous successful performance of the overall air lock leakage test.</li> <li>Results shall be evaluated against acceptance criteria applicable to SR 3.6.1.1.1.</li> <li>Perform required primary containment air lock leakage rate testing in accordance with the Primary Containment Leakage Rate Testing Program.</li> </ol>	In accordance with the Primary Containment Leakage Rate Testing Program
SR 3.6.1.2.2	Verify only one door in the primary containment air lock can be opened at a time.	24 months

3.6.1.3 Primary Containment Isolation Valves (PCIVs)

Each PCIV, except reactor building-to-suppression chamber LCO 3.6.1.3 vacuum breakers, shall be OPERABLE.

MODES 1, 2, and 3, APPLICABILITY: When associated instrumentation is required to be OPERABLE per LCO 3.3.6.1, "Primary Containment Isolation Instrumentation.

#### ACTIONS

-----NOTES-----1. Penetration flow paths may be unisolated intermittently under administrative controls. 2. Separate Condition entry is allowed for each penetration flow path.

- 3. Enter applicable Conditions and Required Actions for systems made inoperable by PCIVs.
- 4. Enter applicable Conditions and Required Actions of LCO 3.6.1.1, "Primary Containment," when PCIV leakage results in exceeding overall containment leakage rate acceptance criteria.

PCIVs 3.6.1.3

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AC <sup>-</sup>	L	UN	· >

CONDITION	REQUIRED ACTION	COMPLETION TIME	
<ul> <li>ANOTE Only applicable to penetration flow paths with two or more PCIVs.</li> <li>One or more penetration flow paths with one PCIV inoperable for reasons other than Condition D.</li> </ul>	A.1 Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured.	4 hours except for main steam line <u>AND</u> 8 hours for main steam line (continued)	

AC.	ΤI	ON	S

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.2NOTES 1. Isolation devices in high radiation areas may be verified by use of administrative means. 2. Isolation devices that are locked, sealed, or otherwise secured may be verified by use of administrative means. Verify the affected penetration flow path is isolated.	Once per 31 day
		Prior to entering MODE 2 or 3 from MODE 4, if primary containment was de-inerted whil in MODE 4, if not performed within the previous 92 days, for isolation devices inside primary containment

(continued)

# ACTIONS

ACTI	ONS				
	CONDITION		REQUIRED ACTION	COMPLETION TIME	
В.	Only applicable to penetration flow paths with two or more PCIVs. One or more penetration flow paths with two or more PCIVs inoperable for reasons other than Condition D.	B.1	Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, or blind flange.	1 hour	
С.	Only applicable to penetration flow paths with only one PCIV. One or more penetration flow paths with one PCIV inoperable for reasons other than Condition D.	C.1 <u>AND</u>	Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, or blind flange.	<pre>4 hours except for excess flow check valves (EFCVs) and penetrations with a closed system AND 72 hours for EFCVs and penetrations with a closed system</pre>	
				(continued)	

## PCIVs 3.6.1.3

ACTIONS	А	C.	Т	Ι	0	Ν	S
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	CONDITION		REQUIRED ACTION	COMPLETION TIME	
С.	(continued)	C.2	I. Isolation devices in high radiation areas may be verified by use of administrative means.		
			<ol> <li>Isolation devices that are a locked, sealed, or otherwise secured may be verified by use of administrative means.</li> </ol>		
			Verify the affected penetration flow path is isolated.	Once per 31 days	
D.	MSIV leakage rate not within limit.	D.1	Restore leakage rate to within limit.	8 hours	
Ε.	Required Action and associated Completion Time of Condition A,	E.1 AND	Be in MODE 3.	12 hours	
	B, C, or D not met in MODE 1, 2, or 3.	E.2	Be in MODE 4.	36 hours	

(continued)

ACT	I	ONS
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CONDITION		REQUIRED ACTION	COMPLETION TIME
F. Required Action and associated Completion Time of Condition A, B, C, or D not met for PCIV(s) required to be OPERABLE during MODE 4 or 5.	F.1 <u>OR</u>	Initiate action to suspend operations with a potential for draining the reactor vessel (OPDRVs).	Immediately
	F.2	Initiate action to restore valve(s) to OPERABLE status.	Immediately

SURVEILLANCE	FREQUENCY
SR 3.6.1.3.1 Not required to be met when the 18 inch primary containment vent and purge valves are open for inerting, de-inerting, pressure control, ALARA or air quality considerations for personnel entry, or Surveillances that require the valves to be open, provided the drywell vent and purge valves and their associated suppression chamber vent and purge valves are not open simultaneously. Verify each 18 inch primary containment vent and purge valve, except the torus purge valve, is closed.	31 days

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		SURVEILLANCE	FREQUENCY
SR 3.	.6.1.3.2	<ul> <li>NOTES</li></ul>	31 days
SR 3.	.6.1.3.3	<ul> <li>NOTES</li></ul>	Prior to entering MODE 2 or 3 from MODE 4 if primary containment was de-inerted while in MODE 4, if not performed within the previous 92 days

(continued)

		SURVEILLANCE	FREQUENCY
SR 3.6.1.3.3       Verify the isolation PCIV, except for MSIVs, is within limits.       with the Inservice Testing Program         SR 3.6.1.3.6       Verify the isolation time of each MSIV is ≥ 3 seconds and ≤ 5 seconds.       In accordance with the Inservice Testing Program         SR 3.6.1.3.7       Verify each automatic PCIV actuates to the isolation position on an actual or simulated isolation signal.       24 months         SR 3.6.1.3.8       Verify each reactor instrumentation line EFCV actuates to the isolation position on an actual or simulated instrument line break signal.       24 months         SR 3.6.1.3.9       Remove and test the explosive squib from each shear isolation valve of the TIP       24 months on STAGGERED TES	SR 3.6.1.3.4	incore probe (TIP) shear isolation valve	31 days
SR 3.6.1.3.0       Verify the isolation of an of seconds.       with the Inservice Testing Program         SR 3.6.1.3.7       Verify each automatic PCIV actuates to the isolation position on an actual or simulated isolation signal.       24 months         SR 3.6.1.3.8       Verify each reactor instrumentation line EFCV actuates to the isolation position on an actual or simulated instrument line break signal.       24 months         SR 3.6.1.3.9       Remove and test the explosive squib from each shear isolation valve of the TIP       24 months on STAGGERED TES	SR 3.6.1.3.5	operated, automatic PCIV, except for	with the Inservice Testing
SR3.6.1.3.7Verify cuch accomposition on an actual or simulated isolation signal.24 monthsSR3.6.1.3.8Verify each reactor instrumentation line EFCV actuates to the isolation position on an actual or simulated instrument line break signal.24 monthsSR3.6.1.3.9Remove and test the explosive squib from each shear isolation valve of the TIP24 months on STAGGERED TES	SR 3.6.1.3.6	Verify the isolation time of each MSIV is $\geq$ 3 seconds and $\leq$ 5 seconds.	with the Inservice Testing
SR 3.6.1.3.9Remove and test the explosive squib from each shear isolation valve of the TIP24 months on STAGGERED TES DADE	SR 3.6.1.3.7	the isolation position on an actual or	24 months
each shear isolation valve of the TIP STAGGERED TES	SR 3.6.1.3.8	EFCV actuates to the isolation position on an actual or simulated instrument line	24 months
	SR 3.6.1.3.9	each shear isolation valve of the TIP	24 months on a STAGGERED TEST BASIS

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		SURVEILLANCE	FREQUENCY
SR	3.6.1.3.10	Verify the combined leakage rate for all MSIV leakage paths is <u>&lt;</u> 46 scfh when tested at <u>&gt;</u> 25 psig.	In accordance with the Primary Containment Leakage Rate Testing Program

3.6.1.4 Drywell Pressure

LCO 3.6.1.4 Drywell pressure shall be  $\leq$  1.5 psig.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS
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	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	Drywell pressure not A.1 Restore drywell within limit. limit. limit.		1 hour	
в.	Required Action and associated Completion Time not met.	B.1 AND	Be in MODE 3.	12 hours
	lime not met.	B.2	Be in MODE 4.	36 hours

	SURVEILLANCE	FREQUENCY
SR 3.6.1.4.1	Verify drywell pressure is within limit.	12 hours

- 3.6 CONTAINMENT SYSTEMS
- 3.6.1.5 Drywell Air Temperature

LCO 3.6.1.5 Drywell average air temperature shall be  $\leq$  150°F.

APPLICABILITY: MODES 1, 2, and 3.

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	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	Drywell average air temperature not within limit.	A.1	Restore drywell average air temperature to within limit.	8 hours
В.	Required Action and associated Completion Time not met.	B.1 AND	Be in MODE 3.	12 hours
	Time not met.	B.2	Be in MODE 4.	36 hours

SURVEIL	LANCE	REQUIREMENT	S

<u></u>	SURVEILLANCE	FREQUENCY
SR 3.6.1.5.1	Verify drywell average air temperature is within limit.	24 hours

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## 3.6 CONTAINMENT SYSTEMS

3.6.1.6 Low Set Relief Valves

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The low set relief function of two relief valves shall be LCO 3.6.1.6 OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	One low set relief valve inoperable.	A.1	Restore low set relief valve to OPERABLE status.	14 days
В.	Required Action and associated Completion Time of Condition A not met. <u>OR</u>	B.1 <u>AND</u> B.2	Be in MODE 3. Be in MODE 4.	12 hours 36 hours
	Two low set relief valves inoperable.			

SURVEILLANCE REQUIREMENTS

	<u>.</u>	SURVEILLANCE	FREQUENCY
SR	3.6.1.6.1	Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. Verify each low set relief valve opens when manually actuated.	24 months
SR	3.6.1.6.2	Valve actuation may be excluded. Verify each low set relief valve actuates on an actual or simulated automatic initiation signal.	24 months

3.6.1.7 Reactor Building-to-Suppression Chamber Vacuum Breakers

LCO 3.6.1.7 Each reactor building-to-suppression chamber vacuum breaker shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

### ACTIONS

Separate Condition entry is allowed for each line.

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	One or more lines with one reactor building- to-suppression chamber vacuum breaker not closed.	A.1	Close the open vacuum breaker.	7 days
В.	One or more lines with two reactor building- to-suppression chamber vacuum breakers not closed.	B.1	Close one open vacuum breaker.	1 hour
С.	One line with one or more reactor building- to-suppression chamber vacuum breakers inoperable for opening.	C.1	Restore the vacuum breaker(s) to OPERABLE status.	7 days

(continued)

ACT	IONS	

	CONDITION		REQUIRED ACTION	COMPLETION TIME	
D.	Two lines with one or more reactor building- to-suppression chamber vacuum breakers inoperable for opening.	D.1	Restore all vacuum breakers in one line to OPERABLE status.	1 hour	
Ε.	Required Action and Associated Completion Time not met.	E.1 <u>AND</u>	Be in MODE 3.	12 hours	
		E.2	Be in MODE 4.	36 hours	

	SURVEILLANCE	FREQUENCY
SR 3.6.1.7.1	<ol> <li>Not required to be met for vacuum breakers that are open during Surveillances.</li> </ol>	
	<ol> <li>Not required to be met for vacuum breakers open when performing their intended function.</li> </ol>	
	Verify each vacuum breaker is closed.	14 days
SR 3.6.1.7.2	Perform a functional test of each vacuum breaker.	92 days

(continued)

	SURVEILLANCE			
SR 3.6.1.7.3	Verify the opening setpoint of each vacuum breaker is <u>≺</u> 0.5 psid.	24 months		

3.6.1.8 Suppression Chamber-to-Drywell Vacuum Breakers

LCO 3.6.1.8 Nine suppression chamber-to-drywell vacuum breakers shall be OPERABLE for opening.

<u>AND</u>

Twelve suppression chamber-to-drywell vacuum breakers shall be closed.

APPLICABILITY: MODES 1, 2, and 3.

CONDITION		REQUIRED ACTION		COMPLETION TIME
Α.	One required suppression chamber- to-drywell vacuum breaker inoperable for opening.	A.1	Restore one vacuum breaker to OPERABLE status.	72 hours
В.	One suppression chamber-to-drywell vacuum breaker not closed.	B.1	Close the open vacuum breaker.	4 hours
с.	Required Action and associated Completion Time not met.	C.1 <u>AND</u> C.2	Be in MODE 3. Be in MODE 4.	12 hours 36 hours

		SURVEILLANCE	FREQUENCY
SR	3.6.1.8.1	<ol> <li>Not required to be met for vacuum breakers that are open during Surveillances.</li> <li>Not required to be met for vacuum breakers open when performing their intended function.</li> <li>Verify each vacuum breaker is closed.</li> </ol>	14 days
SR	3.6.1.8.2	Perform a functional test of each required vacuum breaker.	31 days <u>AND</u> Within 12 hours after any discharge of steam to the suppression chamber from the relief valves
SR	3.6.1.8.3	Verify the opening setpoint of each required vacuum breaker is <u>&lt;</u> 0.5 psid.	24 months

3.6.2.1 Suppression Pool Average Temperature

- LCO 3.6.2.1 Suppression pool average temperature shall be:
  - a.  $\leq$  95°F with THERMAL POWER > 1% RTP and no testing that adds heat to the suppression pool is being performed;
  - b.  $\leq$  105°F with THERMAL POWER > 1% RTP and testing that adds heat to the suppression pool is being performed; and
  - c.  $\leq$  110°F with THERMAL POWER  $\leq$  1% RTP.

APPLICABILITY: MODES 1, 2, and 3.

#### ACTIONS

	CONDITION		REQUIRED ACTION	COMPLETION TIME	
Α.	Suppression pool average temperature > 95°F but <u>&lt;</u> 110°F.	A.1	Verify suppression pool average temperature <u>&lt;</u> 110°F.	Once per hour	
	AND	AND			
	THERMAL POWER > 1% RTP.	A.2	Restore suppression pool average temperature to <u>&lt;</u> 95°F.	24 hours	
	AND				
	Not performing testing that adds heat to the suppression pool.				
В.	Required Action and associated Completion Time of Condition A not met.	B.1	Reduce THERMAL POWER to ≤ 1% RTP.	12 hours	

(continued)

	CONDITION		REQUIRED ACTION	COMPLETION TIME
С.	Suppression pool average temperature > 105°F.	C.1	Suspend all testing that adds heat to the suppression pool.	Immediately
	AND			
	THERMAL POWER > 1% RTP.			
	AND			
	Performing testing that adds heat to the suppression pool.			
D.	Suppression pool average temperature > 110°F but <u>&lt;</u> 120°F.	D.1	Place the reactor mode switch in the shutdown position.	Immediately
		<u>and</u>		
		D.2	Verify suppression pool average temperature <u>≺</u> 120°F.	Once per 30 minutes
		<u>and</u>		
		D.3	Be in MODE 4.	36 hours
Ε.	Suppression pool average temperature > 120°F.	E.1	Depressurize the reactor vessel to < 150 psig.	12 hours
		AND		
		E.2	Be in MODE 4.	36 hours

Suppression Pool Average Temperature 3.6.2.1

	SURVEILLANCE	FREQUENCY
SR 3.6.2.1.1	Verify suppression pool average temperature is within the applicable limits.	24 hours <u>AND</u> 5 minutes when performing testing that adds heat to the suppression pool

Suppression Pool Water Level 3.6.2.2

#### 3.6 CONTAINMENT SYSTEMS

3.6.2.2 Suppression Pool Water Level

LCO 3.6.2.2 Suppression pool water level shall be  $\geq$  14 ft 6.5 inches and  $\leq$  14 ft 10.5 inches.

APPLICABILITY: MODES 1, 2, and 3.

#### ACTIONS

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	Suppression pool water level not within limits.	A.1	Restore suppression pool water level to within limits.	2 hours
В.	Required Action and associated Completion Time not met.	B.1 <u>AND</u>	Be in MODE 3.	12 hours
		B.2	Be in MODE 4.	36 hours

<u></u>	SURVEILLANCE					
SR 3.6.2.2.1	Verify suppression pool water level is within limits.	24 hours				

# 3.6.2.3 Suppression Pool Cooling

LCO 3.6.2.3 Two suppression pool cooling subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

	CONDITION	REQUIRED ACTION		COMPLETION TIME
Α.	One suppression pool cooling subsystem inoperable.	A.1	Restore suppression pool cooling subsystem to OPERABLE status.	7 days
В.	Two suppression pool cooling subsystems inoperable.	B.1	Restore one suppression pool cooling subsystem to OPERABLE status.	8 hours
С.	Required Action and associated Completion Time not met.	C.1 <u>AND</u>	Be in MODE 3.	12 hours
		C.2	Be in MODE 4.	36 hours

		FREQUENCY	
SR	3.6.2.3.1	Verify each suppression pool cooling subsystem manual and power operated valve in the flow path that is not locked, sealed, or otherwise secured in position, is in the correct position or can be aligned to the correct position.	31 days
SR	3.6.2.3.2	Verify each required LPCI pump develops a flow rate ≥ 5000 gpm through the associated heat exchanger while operating in the suppression pool cooling mode.	In accordance with the Inservice Testing Program

3.6.2.4 Suppression Pool Spray

LCO 3.6.2.4 Two suppression pool spray subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

	CONDITION	REQUIRED ACTION		COMPLETION TIME
Α.	One suppression pool spray subsystem inoperable.	A.1	Restore suppression pool spray subsystem to OPERABLE status.	7 days
В.	Two suppression pool spray subsystems inoperable.	B.1	Restore one suppression pool spray subsystem to OPERABLE status.	8 hours
С.	Required Action and associated Completion Time not met.	C.1 <u>AND</u>	Be in MODE 3.	12 hours
		C.2	Be in MODE 4.	36 hours

	FREQUENCY	
SR 3.6.2.4.1	Verify each suppression pool spray subsystem manual and power operated valve in the flow path that is not locked, sealed, or otherwise secured in position, is in the correct position or can be aligned to the correct position.	31 days
SR 3.6.2.4.2	Verify each suppression pool spray nozzle is unobstructed.	10 years

Drywell-to-Suppression Chamber Differential Pressure 3.6.2.5

#### 3.6 CONTAINMENT SYSTEMS

3.6.2.5 Drywell-to-Suppression Chamber Differential Pressure

LCO 3.6.2.5 The drywell pressure shall be maintained ≥ 1.0 psid above the pressure of the suppression chamber. Not required to be met for up to 4 hours during performance of required Surveillances.

APPLICABILITY: MODE 1 during the time period:

- a. From 24 hours after THERMAL POWER is > 15% RTP following startup, to
- b. 24 hours prior to reducing THERMAL POWER to < 15% RTP prior to the next scheduled reactor shutdown.

CONDITION		REQUIRED ACTION		COMPLETION TIME
Α.	Drywell-to-suppression chamber differential pressure not within limit.	A.1	Restore differential pressure to within limit.	24 hours
Β.	Required Action and associated Completion Time not met.	B.1	Reduce THERMAL POWER to <u>≼</u> 15% RTP.	8 hours

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	SURVEILLANCE	FREQUENCY
SR 3.6.2.5.1	Verify drywell-to-suppression chamber differential pressure is within limit.	12 hours

3.6.3.1 Primary Containment Oxygen Concentration

LCO 3.6.3.1 The primary containment oxygen concentration shall be < 4.0 volume percent.

APPLICABILITY: MODE 1 during the time period:

- a. From 24 hours after THERMAL POWER is > 15% RTP following startup, to
- b. 24 hours prior to reducing THERMAL POWER to < 15% RTP prior to the next scheduled reactor shutdown.

#### ACTIONS

	CONDITION		REQUIRED ACTION	COMPLETION TIME	
Α.	Primary containment oxygen concentration not within limit.	A.1	Restore oxygen concentration to within limit.	24 hours	
в.	Required Action and associated Completion Time not met.	B.1	Reduce THERMAL POWER to <u>&lt;</u> 15% RTP.	8 hours	

	SURVEILLANCE	FREQUENCY
SR 3.6.3.1.1	Verify primary containment oxygen concentration is within limits.	7 days

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## 3.6 CONTAINMENT SYSTEMS

## 3.6.4.1 Secondary Containment

LCO 3.6.4.1 The secondary containment shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3, During movement of irradiated fuel assemblies in the secondary containment, During CORE ALTERATIONS, During operations with a potential for draining the reactor vessel (OPDRVs).

CONDITION		REQUIRED ACTION		COMPLETION TIME
Α.	Secondary containment inoperable in MODE 1, 2, or 3.	A.1	Restore secondary containment to OPERABLE status.	4 hours
В.	Required Action and associated Completion Time of Condition A not met.	B.1 <u>AND</u> B.2	Be in MODE 3. Be in MODE 4.	12 hours 36 hours
с.	Secondary containment inoperable during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.	C.1	LCO 3.0.3 is not applicable. Suspend movement of irradiated fuel assemblies in the secondary containment.	Immediately
		ANU		(continued)

ACTIONS	
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	REQUIRED ACTION	COMPLETION TIME	
C.2	Suspend CORE ALTERATIONS.	Immediately	
AND			
C.3	Initiate action to suspend OPDRVs.	Immediately	
	AND	C.2 Suspend CORE ALTERATIONS. <u>AND</u> C.3 Initiate action to	

SURV	SURVEILLANCE REQUIREMENTS					
SURVEILLANCE			FREQUENCY			
SR	3.6.4.1.1	Verify secondary containment vacuum is ≥ 0.25 inch of vacuum water gauge.	24 hours			
SR	3.6.4.1.2	Verify one secondary containment access door in each access opening is closed.	31 days			
SR	3.6.4.1.3	Verify the secondary containment can be maintained ≥ 0.25 inch of vacuum water gauge for 1 hour using one SGT subsystem at a flow rate ≤ 4000 cfm.	24 months on a STAGGERED TEST BASIS for each SGT subsystem			
SR	3.6.4.1.4	Verify all secondary containment equipment hatches are closed and sealed.	24 months			

#### 3.6 CONTAINMENT SYSTEMS

3.6.4.2 Secondary Containment Isolation Valves (SCIVs)

LCO 3.6.4.2 Each SCIV shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3, During movement of irradiated fuel assemblies in the secondary containment, During CORE ALTERATIONS, During operations with a potential for draining the reactor vessel (OPDRVs).

#### ACTIONS

 Penetration flow paths may be unisolated intermittently under administrative controls.

- 2. Separate Condition entry is allowed for each penetration flow path.
- Enter applicable Conditions and Required Actions for systems made inoperable by SCIVs.

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	One or more penetration flow paths with one SCIV inoperable.	A.1	Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, or blind flange.	8 hours
		<u>and</u>		
				(continued)

SCIVs 3.6.4.2

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	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	(continued)	A.2	<ul> <li>Isolation devices</li> <li>in high radiation</li> <li>areas may be</li> <li>verified by use of</li> <li>administrative</li> <li>means.</li> </ul>	
			2. Isolation devices that are locked, sealed, or otherwise secured may be verified by use of administrative means.	
			Verify the affected penetration flow path is isolated.	Once per 31 days
в.	Only applicable to penetration flow paths with two isolation valves. One or more penetration flow paths with two SCIVs inoperable.	B.1	Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, or blind flange.	4 hours

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	CONDITION		REQUIRED ACTION	COMPLETION TIME
C.	Required Action and associated Completion Time of Condition A or B not met in	C.1 <u>AND</u>	Be in MODE 3.	12 hours
	MODE 1, 2, or 3.	C.2	Be in MODE 4.	36 hours
D.	Required Action and associated Completion Time of Condition A or B not met during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.	D.1	LCO 3.0.3 is not applicable. Suspend movement of irradiated fuel assemblies in the secondary containment.	Immediately
		<u>AND</u> D.2	Suspend CORE ALTERATIONS.	Immediately
		<u>AND</u> D.3	Initiate action to suspend OPDRVs.	Immediately

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE			
SR 3.6.4.2.1	<ol> <li>Valves and blind flanges in high radiation areas may be verified by use of administrative means.</li> <li>Not required to be met for SCIVs that are open under administrative controls.</li> </ol>			
	Verify each secondary containment isolation manual valve and blind flange that is not locked, sealed or otherwise secured and is required to be closed during accident conditions is closed.	31 days		
SR 3.6.4.2.2	Verify the isolation time of each power operated, automatic SCIV is within limits.	92 days		
SR 3.6.4.2.3	Verify each automatic SCIV actuates to the isolation position on an actual or simulated actuation signal.	24 months		

#### 3.6 CONTAINMENT SYSTEMS

3.6.4.3 Standby Gas Treatment (SGT) System

LCO 3.6.4.3 Two SGT subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3, During movement of irradiated fuel assemblies in the secondary containment, During CORE ALTERATIONS, During operations with a potential for draining the reactor vessel (OPDRVs).

ACTIONS

<b>1</b>	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	One SGT subsystem inoperable.	A.1	Restore SGT subsystem to OPERABLE status.	7 days
В.	Required Action and associated Completion Time of Condition A not met in MODE 1, 2, or 3.	B.1 <u>AND</u> B.2	Be in MODE 3. Be in MODE 4.	12 hours 36 hours
C.	Required Action and associated Completion Time of Condition A not met during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.		Place OPERABLE SGT subsystem in operation.	Immediately
				(continued)

ACTIONS

	CONDITION		REQUIRED ACTION	COMPLETION TIME
C.	(continued)	C.2.1	Suspend movement of irradiated fuel assemblies in secondary containment.	Immediately
		AND		
		C.2.2	Suspend CORE ALTERATIONS.	Immediately
		AND		
		C.2.3	Initiate action to suspend OPDRVs.	Immediately
D.	Two SGT subsystems inoperable in MODE 1, 2, or 3.	D.1	Restore one SGT subsystem to OPERABLE status.	1 hour
Ε.	Required Action and associated Completion	E.1	Be in MODE 3.	12 hours
	Time of Condition D not met.	AND		
		E.2	Be in MODE 4.	36 hours
F.	Two SGT subsystems inoperable during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.	F.1	LCO 3.0.3 is not applicable. Suspend movement of irradiated fuel assemblies in secondary	Immediately
			containment.	
		<u>AND</u>		
				(continued)

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ACTIONS

	REQUIRED ACTION	COMPLETION TIME
F.2	Suspend CORE ALTERATIONS.	Immediately
AND		
F.3	Initiate action to suspend OPDRVs.	Immediately
	AND	F.2 Suspend CORE ALTERATIONS. <u>AND</u> F.3 Initiate action to

## SURVEILLANCE REQUIREMENTS

		SURVEILLANCE	FREQUENCY
SR	3.6.4.3.1	Operate each SGT subsystem for $\geq 10$ continuous hours with heaters operating.	31 days
SR	3.6.4.3.2	Perform required SGT filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR	3.6.4.3.3	Verify each SGT subsystem actuates on an actual or simulated initiation signal.	24 months

3.7.1 Containment Cooling Service Water (CCSW) System

LCO 3.7.1 Two CCSW subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

#### ACTIONS

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	One CCSW pump inoperable.	A.1	Restore CCSW pump to OPERABLE status.	30 days
В.	One CCSW pump in each subsystem inoperable.	B.1	Restore one CCSW pump to OPERABLE status.	7 days
С.	One CCSW subsystem inoperable for reasons other than Condition A.	C.1	Restore CCSW subsystem to OPERABLE status.	7 days
D.	Both CCSW subsystems inoperable for reasons other than Condition B.	D.1	Restore one CCSW subsystem to OPERABLE status.	8 hours
Ε.	Required Action and associated Completion Time not met.	E.1 <u>AND</u> E.2	Be in MODE 3. Be in MODE 4.	12 hours 36 hours

	SURVEILLANCE	FREQUENCY
SR 3.7.1.1	Verify each CCSW manual and power operated valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position or can be aligned to the correct position.	31 days

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#### 3.7.2 Diesel Generator Cooling Water (DGCW) System

- LCO 3.7.2 The following DGCW subsystems shall be OPERABLE:
  - a. Two DGCW subsystems; and
  - b. The opposite unit DGCW subsystem capable of supporting its associated diesel generator (DG).

APPLICABILITY: MODES 1, 2, and 3.

#### ACTIONS

Separate Condition entry is allowed for each DGCW subsystem.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more DGCW subsystems inoperable.	A.1 Declare associated DG inoperable.	Immediately

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE			
SR 3.7.2.1	Verify each DGCW subsystem manual valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position.	31 days		

	SURVEILLANCE	
SR 3.7.2.2	Verify each DGCW pump starts automatically on an actual or simulated initiation signal.	24 months

3.7.3 Ultimate Heat Sink (UHS)

LCO 3.7.3 The UHS shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

#### ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. UHS inoperable.	A.1	Be in MODE 3.	12 hours
	<u>AND</u>		
	A.2	Be in MODE 4.	36 hours

# SURVEILLANCE REQUIREMENTS

		FREQUENCY	
SR	3.7.3.1	Verify the water level in the CCSW and DGCW pump suction bays is <u>&gt;</u> 501.5 ft mean sea level.	24 hours
SR	3.7.3.2	Verify the average water temperature of UHS is <u>≺</u> 95°F.	24 hours

3.7.4 Control Room Emergency Ventilation (CREV) System

LCO 3.7.4 The CREV System shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3, During movement of irradiated fuel assemblies in the secondary containment, During CORE ALTERATIONS, During operations with a potential for draining the reactor vessel (OPDRVs).

ACTIONS

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	CREV System inoperable in MODE 1, 2, or 3.	A.1	Restore CREV System to OPERABLE status.	7 days
В.	Required Action and associated Completion Time of Condition A	B.1 AND	Be in MODE 3.	12 hours
	not met in MODE 1, 2, or 3.	B.2	Be in MODE 4.	36 hours
C.	CREV System inoperable during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.	LCO 3.0	Suspend movement of irradiated fuel assemblies in the secondary containment.	Immediately
		<u>AND</u>		(continued)

CONDITION		REQUIRED ACTION	COMPLETION TIME
C. (continued)	C.2	Suspend CORE	Immediately
	<u>and</u>		
	C.3	Initiate action to suspend OPDRVs.	Immediately
	C.3		Immediately

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SURVEILLANCE REQUIREMENTS

		FREQUENCY	
SR	3.7.4.1	Operate the CREV System for $\geq$ 10 continuous hours with the heaters operating.	31 days
SR	3.7.4.2	Perform required CREV filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR	3.7.4.3	Verify the CREV System actuates on a manual initiation signal.	24 months
SR	3.7.4.4	Verify the CREV System can maintain a positive pressure of $\geq$ 0.125 inches water gauge relative to the adjacent areas during the isolation/pressurization mode of operation at a flow rate of $\leq$ 2000 scfm.	24 months

3.7.5 Control Room Emergency Ventilation Air Conditioning (AC) System

- LCO 3.7.5 The Control Room Emergency Ventilation AC System shall be OPERABLE.
- APPLICABILITY: MODES 1, 2, and 3, During movement of irradiated fuel assemblies in the secondary containment, During CORE ALTERATIONS, During operations with a potential for draining the reactor vessel (OPDRVs).

ACTIONS

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	Control Room Emergency Ventilation AC System inoperable in MODE 1, 2, or 3.	A.1	Restore Control Room Emergency Ventilation AC System to OPERABLE status.	30 days
В.	Required Action and associated Completion Time of Condition A	B.1 <u>AND</u>	Be in MODE 3.	12 hours
	not met in MODE 1, 2, or 3.	B.2	Be in MODE 4.	36 hours

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CONDITION		REQUIRED ACTION		COMPLETION TIME
C.	Control Room Emergency Ventilation AC System inoperable during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.		O.3 is not applicable. Suspend movement of irradiated fuel assemblies in the secondary containment.	Immediately
		<u>AND</u> C.2	Suspend CORE ALTERATIONS.	Immediately
		<u>AND</u> C.3	Initiate action to suspend OPDRVs.	Immediately

	SURVEILLANCE	FREQUENCY
SR 3.7.5.1	Verify the Control Room Emergency Ventilation AC System has the capability to remove the assumed heat load.	24 months

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#### 3.7.6 Main Condenser Offgas

LCO 3.7.6 The gross gamma activity rate of the noble gases measured prior to the offgas holdup line shall be  $< 252,700 \mu$ Ci/second after decay of 30 minutes.

APPLICABILITY: MODE 1, MODES 2 and 3 with any main steam line not isolated and steam jet air ejector (SJAE) in operation.

ACTI	ACTIONS					
	CONDITION		REQUIRED ACTION	COMPLETION TIME		
Α.	Gross gamma activity rate of the noble gases not within limit.	A.1	Restore gross gamma activity rate of the noble gases to within limit.	72 hours		
В.	Required Action and associated Completion Time not met.	B.1 <u>OR</u>	Isolate all main steam lines.	12 hours		
		B.2 <u>OR</u>	Isolate SJAE.	12 hours		
		B.3.1	Be in MODE 3.	12 hours		
		<u>AND</u> B.3.2	Be in MODE 4.	36 hours		

	SURVEILLANCE	FREQUENCY
SR 3.7.6.1	Not required to be performed until 31 days after any main steam line not isolated and SJAE in operation. Verify the gross gamma activity rate of the noble gases is ≤ 252,700 µCi/second after decay of 30 minutes.	31 days <u>AND</u> Once within 4 hours after a ≥ 50% increase in the nominal steady state fission gas release after factoring out increases due to changes in THERMAL POWER level

3.7.7 The Main Turbine Bypass System

LCO 3.7.7 The Main Turbine Bypass System shall be OPERABLE.

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LCO 3.2.2, "MINIMUM CRITICAL POWER RATIO (MCPR)," limits for an inoperable Main Turbine Bypass System, as specified in the COLR, are made applicable.

APPLICABILITY: THERMAL POWER  $\geq$  25% RTP.

ACTIONS

CONDITION		REQUIRED ACTION		COMPLETION TIME
Α.	Requirements of the LCO not met.	A.1	- Satisfy the requirements of the LCO.	2 hours
в.	Required Action and associated Completion Time not met.	B.1	Reduce THERMAL POWER to < 25% RTP.	4 hours

	SURVEILLANCE	FREQUENCY
SR 3.7.7.1	Verify one complete cycle of each main turbine bypass valve.	92 days

- <u></u>		FREQUENCY	
SR	3.7.7.2	Perform a system functional test.	24 months
SR	3.7.7.3	Verify the TURBINE BYPASS SYSTEM RESPONSE TIME is within limits.	, 24 months

3.7.8 Spent Fuel Storage Pool Water Level

LCO 3.7.8 The spent fuel storage pool water level shall be  $\geq$  19 ft over the top of irradiated fuel assemblies seated in the spent fuel storage pool racks.

APPLICABILITY: During movement of irradiated fuel assemblies in the spent fuel storage pool, During movement of new fuel assemblies in the spent fuel storage pool with irradiated fuel assemblies seated in the spent fuel storage pool.

#### ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Spent fuel storage pool water level not within limit.	A.1NOTE LCO 3.0.3 is not applicable. Suspend movement of fuel assemblies in the spent fuel storage pool.	Immediately

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.7.8.1	Verify the spent fuel storage pool water level is $\geq$ 19 ft over the top of irradiated fuel assemblies seated in the spent fuel storage pool racks.	7 days

#### 3.8 ELECTRICAL POWER SYSTEMS

#### 3.8.1 AC Sources-Operating

- 1CO 3.8.1 The following AC electrical power sources shall be OPERABLE:
  - a. Two qualified circuits between the offsite transmission network and the onsite Class 1E AC Electrical Power Distribution System;
  - b. Two diesel generators (DGs);
  - c. One qualified circuit between the offsite transmission network and the opposite unit's Division 2 onsite Class 1E AC electrical power distribution subsystem capable of supporting the equipment required to be OPERABLE by LCO 3.6.4.3, "Standby Gas Treatment (SGT) System," LCO 3.7.4, "Control Room Emergency Ventilation (CREV) System" (Unit 3 only), and LCO 3.7.5, "Control Room Emergency Ventilation Air Conditioning (AC) System" (Unit 3 only); and
  - d. The opposite unit's DG capable of supporting the equipment required to be OPERABLE by LCO 3.6.4.3, LCO 3.7.4 (Unit 3 only), and LCO 3.7.5 (Unit 3 only).

APPLICABILITY: MODES 1, 2, and 3.

The opposite unit's AC electrical power sources in LCO 3.8.1.c and d are not required to be OPERABLE when the associated required equipment (SGT subsystem, CREV System (Unit 3 only), and Control Room Emergency Ventilation AC System (Unit 3 only)) is inoperable.

#### ACTIONS

LCO 3.0.4 is not applicable for the opposite unit's AC electrical power sources.

CONDITION		REQUIRED ACTION	COMPLETION TIME
A. One required offsite circuit inoperable.	A.1	Perform SR 3.8.1.1 for OPERABLE required offsite circuit.	1 hour <u>AND</u> Once per 8 hours thereafter
	AND		
	A.2	Declare required feature(s) with no offsite power available inoperable when the redundant required feature(s) are inoperable.	24 hours from discovery of no offsite power to one division concurrent with inoperability of redundant required feature(s)
	<u>AND</u>		
	A.3	Restore required offsite circuit to OPERABLE status.	7 days <u>AND</u>
			14 days from discovery of failure to meet LCO 3.8.1.a or b

ACTIONS

CONDITION		REQUIRED ACTION	COMPLETION TIME
3. One required DG inoperable.	B.1	Perform SR 3.8.1.1 for OPERABLE required offsite circuit(s).	l hour <u>AND</u>
			Once per 8 hours thereafter
	AND		
	В.2	Declare required feature(s), supported by the inoperable DG, inoperable when the redundant required feature(s) are inoperable.	4 hours from discovery of Condition B concurrent with inoperability of redundant required feature(s)
	<u>AND</u>		
	B.3.1	Determine OPERABLE DG(s) are not inoperable due to common cause failure.	24 hours
	<u>OR</u>		
	B.3.2	Perform SR 3.8.1.2 for OPERABLE DG(s).	24 hours
	AND		
	B.4	Restore required DG to OPERABLE status.	7 days
			AND
			14 days from discovery of failure to meet LCO 3.8.1.a or 1

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ACTIONS				
CONDITION		REQUIRED ACTION		COMPLETION TIME
с.	Two required offsite circuits inoperable.	C.1	Declare required feature(s) inoperable when the redundant required feature(s) are inoperable.	12 hours from discovery of Condition C concurrent with inoperability of redundant required feature(s)
		<u>AND</u> C.2	Restore one required offsite circuit to OPERABLE status.	24 hours
D.	One required offsite circuit inoperable. <u>AND</u> One required DG inoperable.	Enter applicable Conditions and Required Actions of LCO 3.8.7, "Distribution Systems - Operating," when Condition D is entered with no AC power source to any division.		
		D.1	Restore required offsite circuit to OPERABLE status.	12 hours
		<u>OR</u> D.2	Restore required DG to OPERABLE status.	12 hours
Ε.	Two required DGs inoperable.	E.1	Restore one required DG to OPERABLE status.	2 hours

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	CONDITION	REQUIRED ACTION		COMPLETION TIME
F.	Required Action and associated Completion Time of Condition A,	F.1 AND	Be in MODE 3.	12 hours
	B, C, D, or E not met.	F.2	Be in MODE 4.	36 hours
G.	Three or more required AC sources inoperable.	G.1	Enter LCO 3.0.3.	Immediately

	NOTES
1.	SR 3.8.1.1 through SR 3.8.1.20 are applicable only to the given unit's AC electrical power sources.
2.	SR 3.8.1.21 is applicable to the opposite unit's AC electrical power

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Z. SK 3.8.1.21 is applicable to the opposite unit's AC electrical power sources.

<u></u>	SURVEILLANCE	FREQUENCY
SR 3.8.1.1	Verify correct breaker alignment and indicated power availability for each required offsite circuit.	7 days
SR 3.8.1.2	<ul> <li>NOTES</li></ul>	31 days

_	SURVEILLANCE	FREQUENCY
SR 3.8.1.3	<ol> <li>DG loadings may include gradual loading as recommended by the manufacturer.</li> </ol>	
	<ol> <li>Momentary transients outside the load range do not invalidate this test.</li> </ol>	
	<ol> <li>This Surveillance shall be conducted on only one DG at a time.</li> </ol>	
	<ol> <li>This SR shall be preceded by and immediately follow, without shutdown, a successful performance of SR 3.8.1.2 or SR 3.8.1.8.</li> </ol>	
	5. A single test of the common DG at the specified Frequency will satisfy the Surveillance for both units.	
	Verify each DG is synchronized and loaded and operates for $\geq$ 60 minutes at a load $\geq$ 2340 kW and $\leq$ 2600 kW.	31 days
SR 3.8.1.4	Verify each day tank contains $\geq$ 205 gal of fuel oil and each bulk fuel storage tank contains $\geq$ 10,000 gal of fuel oil.	31 days
SR 3.8.1.5	Remove accumulated water from each day tank.	31 days
SR 3.8.1.6	Verify each fuel oil transfer pump operates to automatically transfer fuel oil from the storage tank to the day tank.	31 days

		SURVEILLANCE	FREQUENCY
SR	3.8.1.7	Check for and remove accumulated water from each bulk storage tank.	92 days
SR	3.8.1.8	<ul> <li>NOTES</li></ul>	184 days
SR	3.8.1.9	Verify manual transfer of unit power supply from the normal offsite circuit to the alternate offsite circuit.	24 months

	SURVEILLANCE	FREQUENCY
SR 3.8.1.10	A single test of the common DG at the specified Frequency will satisfy the Surveillance for both units. Verify each DG rejects a load greater than or equal to its associated single largest post-accident load, and: a. Following load rejection, the	24 months
	frequency is <u>&lt;</u> 66.73 Hz; b. Within 3 seconds following load rejection, the voltage is <u>&gt;</u> 3952 V and	
	$\leq$ 4368 V; and c. Within 4 seconds following load rejection, the frequency is $\geq$ 58.8 Hz and $\leq$ 61.2 Hz.	
SR 3.8.1.11	<ol> <li>A single test of the common DG at the specified Frequency will satisfy the Surveillance for both units.</li> </ol>	
	2. Momentary transients outside the voltage limit do not invalidate this test.	
	Verify each DG does not trip and voltage is maintained $\leq$ 5000 V during and following a load rejection of $\geq$ 2340 kW and $\leq$ 2600 kW.	24 months

	SURVEILLANCE				
SR 3.8.1.12	A1 1	DG starts may be preceded by an engine ube period.			
		fy on an actual or simulated loss of site power signal:	24 months		
	a.	De-energization of emergency buses;			
	b.	Load shedding from emergency buses; and			
	c.	DG auto-starts from standby condition and:			
		1. energizes permanently connected loads in $\leq$ 13 seconds,			
		2. maintains steady state voltage <u>&gt;</u> 3952 V and <u>&lt;</u> 4368 V,			
		3. maintains steady state frequency $\geq$ 58.8 Hz and $\leq$ 61.2 Hz, and			
		4. supplies permanently connected loads for $\geq$ 5 minutes.			

(continued)

		FREQUENCY	
SR	3.8.1.13	All DG starts may be preceded by an engine prelube period.	
		Verify on an actual or simulated Emergency Core Cooling System (ECCS) initiation signal each DG auto-starts from standby condition and:	24 months
		a. In $\leq$ 13 seconds after auto-start, achieves voltage $\geq$ 3952 V and frequency $\geq$ 58.8 Hz;	
		b. Achieves steady state voltage $\geq$ 3952 V and $\leq$ 4368 V and frequency $\geq$ 58.8 Hz and $\leq$ 61.2 Hz; and	
		c. Operates for $\geq$ 5 minutes.	
SR	3.8.1.14	Verify each DG's automatic trips are bypassed on actual or simulated loss of voltage signal on the emergency bus concurrent with an actual or simulated ECCS initiation signal except:	24 months
		a. Engine overspeed; and	
		b. Generator differential current.	

	SURVEILLANCE	FREQUENCY
SR 3.8.1.15	<ol> <li>Momentary transients outside the load range and power factor limit do not invalidate this test.</li> </ol>	
	<ol> <li>If grid conditions do not permit, the power factor limit is not required to be met. Under this condition, the power factor shall be maintained as close to the limit as practicable.</li> </ol>	
	<ol> <li>A single test of the common DG at the specified Frequency will satisfy the Surveillance for both units.</li> </ol>	
	Verify each DG operating within the power factor limit operates for $\geq$ 24 hours:	24 months
	a. For $\geq$ 2 hours loaded $\geq$ 2730 kW and $\leq$ 2860 kW; and	
	b. For the remaining hours of the test loaded $\geq$ 2340 kW and $\leq$ 2600 kW.	

(continued)

		SURVEILLANCE	FREQUENCY
SR 3.8	3.1.16	<ol> <li>This Surveillance shall be performed within 5 minutes of shutting down the DG after the DG has operated ≥ 2 hours loaded ≥ 2340 kW.</li> </ol>	
		Momentary transients below the load limit do not invalidate this test.	
		<ol> <li>All DG starts may be preceded by an engine prelube period.</li> </ol>	
		<ol> <li>A single test of the common DG at the specified Frequency will satisfy the Surveillance for both units.</li> </ol>	
		Verify each DG starts and achieves:	24 months
		a. In $\leq$ 13 seconds, voltage $\geq$ 3952 and frequency $\geq$ 58.8 Hz; and	
		b. Steady state voltage $\geq$ 3952 V and $\leq$ 4368 V and frequency $\geq$ 58.8 Hz and $\leq$ 61.2 Hz.	
SR 3.	8.1.17	Verify each DG:	24 months
		<ul> <li>a. Synchronizes with offsite power source while loaded with emergency loads upon a simulated restoration of offsite power;</li> </ul>	
		<ul> <li>Transfers loads to offsite power source; and</li> </ul>	
		c. Returns to ready-to-load operation.	

(continued)

		S	URVEILLANCE	FREQUENCY
SR	3.8.1.18	block is	terval between each sequenced load ≥ 90% of the design interval for sequence time delay relay.	24 months
SR	3.8.1.19		arts may be preceded by an engine eriod.	
		offsite p	n an actual or simulated loss of ower signal in conjunction with an simulated ECCS initiation signal:	24 months
		a. De-e	nergization of emergency buses;	
		b. Load and	shedding from emergency buses;	
		c. DG a and:	uto-starts from standby condition	
		1.	energizes permanently connected loads in $\leq$ 13 seconds,	
		2.	energizes auto-connected emergency loads including through time delay relays, where applicable,	
		3.	maintains steady state voltage ≥ 3952 V and ≤ 4368 V,	
		4.	maintains steady state frequency $\geq$ 58.8 Hz and $\leq$ 61.2 Hz, and	
		5.	supplies permanently connected and auto-connected emergency loads for $\geq$ 5 minutes.	

		SURVEILLANCE	FREQUENCY
SR	3.8.1.20	All DG starts may be preceded by an engine prelube period.	
		Verify, when started simultaneously from standby condition, each DG achieves, in $\leq$ 13 seconds, voltage $\geq$ 3952 V and frequency $\geq$ 58.8 Hz.	10 years
SR	3.8.1.21	<pre>When the opposite unit is in MODE 4 or 5, or moving irradiated fuel assemblies in secondary containment, the following opposite unit SRs are not required to be performed: SR 3.8.1.3, SR 3.8.1.10 through SR 3.8.1.12, and SR 3.8.1.14 through SR 3.8.1.17.</pre> For required opposite unit AC electrical power sources, the SRs of the opposite unit's Specification 3.8.1, except SR 3.8.1.9, SR 3.8.1.13, SR 3.8.1.18, SR 3.8.1.19, and SR 3.8.1.20, are applicable.	In accordance with applicable SRs

## 3.8 ELECTRICAL POWER SYSTEMS

#### 3.8.2 AC Sources - Shutdown

- LCO 3.8.2 The following AC electrical power sources shall be OPERABLE:
  - One qualified circuit between the offsite transmission network and the onsite Class 1E AC electrical power distribution subsystem(s) required by LCO 3.8.8,
     "Distribution Systems - Shutdown"; and
  - b. One diesel generator (DG) capable of supplying one division of the onsite Class 1E AC electrical power distribution subsystem(s) required by LCO 3.8.8.
- APPLICABILITY: MODES 4 and 5, During movement of irradiated fuel assemblies in the secondary containment.

LCO 3.0.3 is not applicable.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One required offsite circuit inoperable.	Enter applicable Condition and Required Actions of LCO 3.8.8, when any required division is de-energized as a result of Condition A.	Immediately
	A.1 Declare affected required feature(s), with no offsite power available, inoperable.	
	<u>OR</u>	
	A.2.1 Suspend CORE ALTERATIONS.	Immediately
	AND	
		(continued)

CONDITION		REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.2.2	Suspend movement of irradiated fuel assemblies in the secondary containment.	Immediately
	AND	<u>)</u>	
	A.2.3	Initiate action to suspend operations with a potential for draining the reactor vessel (OPDRVs).	Immediately
	AND	2	
	A.2.4	Initiate action to restore required offsite power circuit to OPERABLE status.	Immediately

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CONDITION		REQUIRED ACTION	COMPLETION TIME
B. One required DG inoperable.	B.1	Suspend CORE ALTERATIONS.	Immediately
	AND		
	В.2	Suspend movement of irradiated fuel assemblies in secondary containment.	Immediately
	AND		
	B.3	Initiate action to suspend OPDRVs.	Immediately
	AND		
	B.4	Initiate action to restore required DG to OPERABLE status.	Immediately

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SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.8.2.1 1. The following SRs are not required to be performed: SR 3.8.1.3, SR 3.8.1.10 through SR 3.8.1.12, and SR 3.8.1.14 through SR 3.8.1.19. 2. SR 3.8.1.13 and SR 3.8.1.19 are not required to be met when associated ECCS subsystem(s) are not required to be OPERABLE per LCO 3.5.2, "ECCS – Shutdown." For AC sources required to be OPERABLE the SRs of Specification 3.8.1, except SR 3.8.1.9, SR 3.8.1.20, and SR 3.8.1.21 are applicable.	In accordance with applicable SRs

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Diesel Fuel Oil and Starting Air 3.8.3

## 3.8 ELECTRICAL POWER SYSTEMS

3.8.3 Diesel Fuel Oil and Starting Air

LCO 3.8.3 The stored diesel fuel oil and starting air subsystem shall be within limits for each required diesel generator (DG).

APPLICABILITY: When associated DG is required to be OPERABLE.

## ACTIONS

Separate Condition entry is allowed for each DG.

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	One or more DGs with stored fuel oil total particulates not within limit.	A.1	Restore stored fuel oil total particulates to within limit.	7 days
в.	One or more DGs with new fuel oil properties not within limits.	B.1	Restore stored fuel oil properties to within limits.	30 days
С.	One or more DGs with required starting air receiver pressure < 220 psig and ≥ 175 psig.	C.1	Restore starting air receiver pressure to ≥ 220 psig.	48 hours

	CONDITION		REQUIRED ACTION	COMPLETION TIME	
D.	Required Action and associated Completion Time of Condition A, B, or C not met.	D.1	Declare associated DG inoperable.	Immediately	
	<u>OR</u>				
	One or more DGs with stored diesel fuel oil or starting air subsystem not within limits for reasons other than Condition A, B, or C.				

SURV	EILLANCE R	EQUIREMENTS SURVEILLANCE	FREQUENCY
SR	3.8.3.1	Verify fuel oil properties of new and stored fuel oil are tested in accordance with, and maintained within the limits of, the Diesel Fuel Oil Testing Program.	In accordance with the Diesel Fuel Oil Testing Program
SR	3.8.3.2	Verify each required DG air start receiver pressure is ≥ 220 psig.	31 days

## 3.8 ELECTRICAL POWER SYSTEMS

## 3.8.4 DC Sources - Operating

- LCO 3.8.4 The following DC electrical power subsystems shall be OPERABLE:
  - a. Two 250 VDC electrical power subsystems;
  - Division 1 and Division 2 125 VDC electrical power subsystems; and
  - c. The opposite unit's Division 2 125 VDC electrical power subsystem capable of supporting equipment required to be OPERABLE by LCO 3.6.4.3, "Standby Gas Treatment (SGT) System," LCO 3.7.4, "Control Room Emergency Ventilation (CREV) System" (Unit 3 only), LCO 3.7.5, "Control Room Emergency Ventilation Air Conditioning (AC) System" (Unit 3 only), and LCO 3.8.1, "AC Sources-Operating."

APPLICABILITY: MODES 1, 2, and 3.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One 250 VDC battery inoperable as a result of maintenance or testing.	A.1 Restore 250 VDC battery to OPERABLE status.	Prior to exceeding 7 cumulative days per operating cycle of battery inoperability, on a per battery basis, as a result of maintenance or testing

ACTIONS

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	CONDITION		REQUIRED ACTION	COMPLETION TIME
В.	One 250 VDC battery inoperable, due to the need to replace the battery, as determined by maintenance or testing.	B.1	Restore 250 VDC battery to OPERABLE status.	7 days
C.	One 250 VDC electrical power subsystem inoperable for reasons other than Conditions A or B.	C.1	Restore 250 VDC electrical power subsystem to OPERABLE status.	2 hours
D.	Only applicable if the opposite unit is in MODE 1, 2, or 3.	D.1 <u>AND</u>	Place associated OPERABLE alternate 125 VDC electrical power subsystem in service.	2 hours
	125 VDC battery inoperable as a result of maintenance or testing.	D.2	Restore Division 1 or 2 125 VDC battery to OPERABLE status.	Prior to exceeding 7 cumulative days per operating cycle on a per battery basis

(continued)

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ACT	IONS
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	CONDITION		REQUIRED ACTION	COMPLETION TIME
Ε.	Only applicable if the opposite unit is in MODE 1, 2, or 3.	E.1	Place associated OPERABLE alternate 125 VDC electrical power subsystem in service.	2 hours
	Division 1 or 2 125 VDC battery inoperable, due to the need to replace the battery, as determined by maintenance or testing.	<u>AND</u> E.2	Restore Division 1 or 2 125 VDC battery to OPERABLE status.	7 days
F.	Division 1 or 2 125 VDC electrical power subsystem inoperable for reasons other than Condition D or E.	F.1 <u>OR</u>	Restore Division 1 or 2 125 VDC electrical power subsystem to OPERABLE status.	2 hours
		F.2	Only applicable if the opposite unit is not in MODE 1, 2, or 3.	
			Place associated OPERABLE alternate 125 VDC electrical power subsystem in service.	2 hours

CONDITION	REQUIRED ACTION		COMPLETION TIME	
G. Opposite unit Division 2 125 VDC electrical power subsystem inoperable.	G.1	Restore opposite unit Division 2 125 VDC electrical power subsystem to OPERABLE status.	7 days	
H. Required Action and associated Completion Time not met.	H.1 <u>AND</u>	Be in MODE 3.	12 hours	
	H.2	Be in MODE 4.	36 hours	

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		SURVEILLANCE	FREQUENCY
SR 3.8.4.1		Verify battery terminal voltage on float charge is:	7 days
		a. <u>&gt;</u> 260.4 VDC for each 250 VDC subsystem;	
		b. $\geq$ 125.9 VDC for each 125 VDC subsystem; and	
		C. Only required to be met when the Unit 2 alternate battery is required to be OPERABLE.	
		≥ 130.2 VDC for Unit 2 alternate battery.	
SR	3.8.4.2	Verify no visible corrosion at battery terminals and connectors.	92 days
		<u>OR</u>	
		Verify battery connection resistance is $\leq 1.5E-4$ ohm for inter-cell connections and $\leq 1.5E-4$ ohm for terminal connections.	
SR	3.8.4.3	Verify each required 250 V battery charger supplies $\geq$ 200 amps at $\geq$ 260 VDC for $\geq$ 4 hours for the 250 VDC subsystems.	18 months
SR	3.8.4.4	Verify battery cells, cell plates, and racks show no visual indication of physical damage or abnormal deterioration that could degrade battery performance.	24 months

		SURVEILLANCE .	FREQUENCY
SR	3.8.4.5	Remove visible corrosion and verify battery cell to cell and terminal connections are coated with anti-corrosion material.	24 months
SR	3.8.4.6	Verify battery connection resistance is $\leq 1.5E-4$ ohm for inter-cell connections and $\leq 1.5E-4$ ohm for terminal connections.	24 months
SR	3.8.4.7	Verify each required 125 V battery charger supplies $\geq$ 200 amps at $\geq$ 130 VDC for $\geq$ 4 hours for the 125 VDC subsystems.	24 months
SR	3.8.4.8	The modified performance discharge test in SR 3.8.4.9 may be performed in lieu of the service test in SR 3.8.4.8 provided the modified performance discharge test completely envelopes the service test. Verify battery capacity is adequate to supply, and maintain in OPERABLE status, the required emergency loads for the design duty cycle when subjected to a battery service test.	24 months

	SURVEILLANCE	FREQUENCY
SR 3.8.4.9	Verify battery capacity is ≥ 80% of the manufacturer's rating when subjected to a performance discharge test or a modified performance discharge test.	60 months <u>AND</u> 12 months when battery shows degradation or has reached 85% of expected life with capacity < 100% of manufacturer's rating <u>AND</u> 24 months when battery has reached 85% of the expected life with capacity ≥ 100% of manufacturer's rating

## 3.8 ELECTRICAL POWER SYSTEMS

3.8.5 DC Sources - Shutdown

LCO 3.8.5 One 250 VDC and one 125 VDC electrical power subsystem shall be OPERABLE to support the 250 VDC and one 125 VDC Class 1E electrical power distribution subsystems required by LCO 3.8.8, "Distribution Systems-Shutdown."

APPLICABILITY: MODES 4 and 5, During movement of irradiated fuel assemblies in the secondary containment.

#### ACTIONS

LCO 3.0.3 is not applicable.

CONDITION		REQUIRED ACTION	COMPLETION TIME
A. One or more required DC electrical power subsystems inoperable.	A.1	Declare affected required feature(s) inoperable.	Immediately
	<u> 0                                   </u>		
	A.2.1	Suspend CORE ALTERATIONS.	Immediately
	<u>and</u>		
	A.2.2	Suspend movement of irradiated fuel assemblies in the secondary containment.	Immediately
	AND		
			(continued)

CONDITION		REQUIRED ACTION	COMPLETION TIME	
A. (continued)	A:2.3	Initiate action to suspend operations with a potential for draining the reactor vessel.	Immediately	
	ANI	2		
	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	<ul> <li>NOTE</li></ul>	In accordance with applicable SRs

## 3.8 ELECTRICAL POWER SYSTEMS

## 3.8.6 Battery Cell Parameters

LCO 3.8.6 Battery cell parameters for the 125 V and 250 V station batteries shall be within limits.

APPLICABILITY: When associated DC electrical power subsystems are required to be OPERABLE.

#### ACTIONS

Separate Condition entry is allowed for each battery.

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	One or more batteries with one or more battery cell parameters not within Table 3.8.6-1 Category A or B limits.	A.1 <u>AND</u>	Verify pilot cell(s) electrolyte level and float voltage meet Table 3.8.6-1 Category C limits.	1 hour
		A.2		24 hours
				AND
				Once per 7 days thereafter
		AND		
		A.3	Restore battery cell parameters to Table 3.8.6-1 Category A and B limits.	31 days

CONDITION			REQUIRED ACTION	COMPLETION TIME	
Β.	Required Action and associated Completion Time of Condition A not met.	B.1	Declare associated battery inoperable.	Immediately	
	<u>OR</u>				
	One or more batteries with average electrolyte temperature of the representative cells not within limits.				
	<u>OR</u>				
	One or more batteries with one or more battery cell parameters not within Table 3.8.6-1 Category C limits.				

		SURVEILLANCE	FREQUENCY
SR	3.8.6.1	Verify battery cell parameters meet Table 3.8.6-1 Category A limits.	7 days
SR	3.8.6.2	Verify battery cell parameters meet Table 3.8.6-1 Category B limits.	92 days <u>AND</u> Once within 7 days after battery discharge < 105 V for 125 V batteries and < 210 V for 250 V batteries <u>AND</u> Once within 7 days after battery overcharge > 150 V for 125 V batteries and > 300 V for 250 V batteries
SR	3.8.6.3	Verify average electrolyte temperature of representative cells is > 65°F.	92 days

PARAMETER	CATEGORY A: LIMITS FOR EACH DESIGNATED PILOT CELL	CATEGORY B: LIMITS FOR EACH CONNECTED CELL	CATEGORY C: LIMITS FOR EACH CONNECTED CELL
Electrolyte Level	> Minimum level indication mark, and <u>&lt;</u> ¼ inch above maximum level indication mark <sup>(a)</sup>	> Minimum level indication mark, and <u>&lt;</u> ¼ inch above maximum level indication mark <sup>(a)</sup>	Above top of plates, and not overflowing
Float Voltage	≥ 2.13 V	<u>&gt;</u> 2.13 V	> 2.07 V
Specific Gravity <sup>(b)(c)</sup>	<u>&gt;</u> 1.200	≥ 1.195 <u>AND</u> Average of all connected cells > 1.205	Not more than 0.020 below average of all connected cells <u>AND</u> Average of all connected cells <u>≥</u> 1.195

Table 3.8.6-1 (page 1 of 1) Battery Cell Parameter Requirements

- (a) It is acceptable for the electrolyte level to temporarily increase above the specified maximum level during and, for a limited time, following equalizing charges provided it is not overflowing.
- (b) Corrected for electrolyte temperature and level.
- (c) A battery charging current of < 2 amps when on float charge is acceptable for meeting specific gravity limits following a battery recharge, for a maximum of 7 days. When charging current is used to satisfy specific gravity requirements, specific gravity of each connected cell shall be measured prior to expiration of the 7 day allowance.

#### 3.8 ELECTRICAL POWER SYSTEMS

## 3.8.7 Distribution Systems - Operating

- LCO 3.8.7 The following electrical power distribution subsystems shall be OPERABLE:
  - Division 1 and Division 2 AC and DC electrical power а. distribution subsystems; and
  - b. The portions of the opposite unit's Division 2 AC and DC electrical power distribution subsystem necessary to support equipment required to be OPERABLE by LCO 3.6.4.3, "Standby Gas Treatment (SGT) System," LCO 3.7.4, "Control Room Emergency Ventilation (CREV) System" (Unit 3 only), LCO 3.7.5, "Control Room Emergency Ventilation Air Conditioning (AC) System" (Unit 3 only), and LCO 3.8.1, "AC Sources-Operating."

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS	
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CONDITION	REQUIRED ACTION		COMPLETION TIME	
A. One or more AC electrical power distribution subsystems inoperable.	A.1	Restore AC electrical power distribution subsystems to OPERABLE status.	8 hours <u>AND</u> 16 hours from discovery of failure to meet LCO 3.8.7.a	

ACTIONS	S
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	CONDITION	REQUIRED ACTION	COMPLETION TIME
В.	One or more DC electrical power distribution subsystems inoperable.	B.1 Restore DC electrical power distribution subsystems to OPERABLE status.	2 hours <u>AND</u> 16 hours from discovery of failure to meet LCO 3.8.7.a
с.	One or more required opposite unit Division 2 AC or DC electrical power distribution subsystems inoperable.	Enter applicable Conditions and Required Actions of LCO 3.8.1 when Condition C results in the inoperability of a required offsite circuit.	
		C.1 Restore required opposite unit Division 2 AC and DC electrical power distribution subsystems to OPERABLE status.	7 days
D.	Required Action and associated Completion Time of Condition A, B, or C not met.	D.1 Be in MODE 3. <u>AND</u>	12 hours
	, , , , , , ,, ,, ,, ,, ,, ,, ,, ,, ,,	D.2 Be in MODE 4.	36 hours
Ε.	Two or more electrical power distribution subsystems inoperable that, in combination, result in a loss of function.	E.1 Enter LCO 3.0.3.	Immediately

	SURVEILLANCE	FREQUENCY
SR 3.8.7.1	Verify correct breaker alignments and voltage to required AC and DC electrical power distribution subsystems.	7 days

## 3.8 ELECTRICAL POWER SYSTEMS

# 3.8.8 Distribution Systems - Shutdown

LCO 3.8.8 The necessary portions of the AC, DC, and the opposite unit's Division 2 electrical power distribution subsystems shall be OPERABLE to support equipment required to be OPERABLE.

APPLICABILITY: MODES 4 and 5, During movement of irradiated fuel assemblies in the secondary containment.

## ACTIONS

LCO 3.0.3 is not applicable.

CONDITION			REQUIRED ACTION	COMPLETION TIME
Α.	One or more required AC or DC electrical power distribution subsystems inoperable.	A.1	Declare associated supported required feature(s) inoperable.	Immediately
		<u>OR</u> A.2.1 <u>AND</u>	Suspend CORE ALTERATIONS.	Immediately
				(continued)

CONDITION		REQUIRED ACTION COMPLETION T	
A. (continued)	A.2.2	Suspend movement of irradiated fuel assemblies in the secondary containment.	Immediately
	AND	<u>)</u>	
	A.2.3	Initiate action to suspend operations with a potential for draining the reactor vessel.	Immediately
	<u>AN[</u>	<u>)</u>	
	A.2.4	Initiate actions to restore required AC and DC electrical power distribution subsystems to OPERABLE status.	Immediately
	<u>AN</u> [	2	
	A.2.5	Declare associated required shutdown cooling subsystem(s) inoperable and not in operation.	Immediately

	SURVEILLANCE	FREQUENCY
SR 3.8.8.1	Verify correct breaker alignments and voltage to required AC and DC electrical power distribution subsystems.	7 days

Refueling Equipment Interlocks 3.9.1

#### 3.9 REFUELING OPERATIONS

3.9.1 Refueling Equipment Interlocks

LCO 3.9.1 The refueling equipment interlocks associated with the reactor mode switch refuel position shall be OPERABLE.

APPLICABILITY: During in-vessel fuel movement with equipment associated with the interlocks when the reactor mode switch is in the refuel position.

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	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	One or more required refueling equipment interlocks inoperable.	A.1	Suspend in-vessel fuel movement with equipment associated with the inoperable interlock(s).	Immediately
		<u> 0                                   </u>		
		A.2.1	Insert a control rod withdrawal block.	Immediately
		AND		
		A.2.2	Verify all control rods are fully inserted.	Immediately

	FREQUENCY			
SR 3.9.1.1	3.9.1.1 Perform CHANNEL FUNCTIONAL TEST on each of the following required refueling equipment interlock inputs:			
	a. All-rods-in,			
	b. Refuel platform position,			
	c. Refuel platform fuel grapple, fuel loaded,			
	d. Refuel platform fuel grapple fully retracted position,			
	e. Refuel platform frame mounted hoist, fuel loaded,			
	f. Refuel platform monorail mounted hoist, fuel loaded, and			
	g. Service platform hoist, fuel loaded.			

Refuel Position One-Rod-Out Interlock 3.9.2

#### 3.9 REFUELING OPERATIONS

3.9.2 Refuel Position One-Rod-Out Interlock

LCO 3.9.2	The re	fuel position	one-rod-out	interlock	shall	be	OPERABLE.
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APPLICABILITY: MODE 5 with the reactor mode switch in the refuel position and any control rod withdrawn.

## ACTIONS

CONDITION		REQUIRED ACTION	COMPLETION TIME
A. Refuel position one- rod-out interlock inoperable.	A.1 <u>AND</u>	Suspend control rod withdrawal.	Immediately
	A.2	Initiate action to fully insert all insertable control rods in core cells containing one or more fuel assemblies.	Immediately

## SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.9.2.1	Verify reactor mode switch locked in Refuel position.	12 hours

Refuel Position One-Rod-Out Interlock 3.9.2

		FREQUENCY
	SURVEILLANCE	
SR 3.9.2.2	Not required to be performed until 1 hour after any control rod is withdrawn.	
	Perform CHANNEL FUNCTIONAL TEST.	7 days

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# 3.9 REFUELING OPERATIONS

3.9.3 Control Rod Position

LCO 3.9.3 All control rods shall be fully inserted.

APPLICABILITY: When loading fuel assemblies into the core.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more control rods not fully inserted.	A.1 Suspend loading fuel assemblies into the core.	Immediately

	FREQUENCY	
SR 3.9.3.1	Verify all control rods are fully inserted.	12 hours

## 3.9 REFUELING OPERATIONS

3.9.4 Control Rod Position Indication

LCO 3.9.4 The control rod "full-in" position indication channel for each control rod shall be OPERABLE.

APPLICABILITY: MODE 5.

## ACTIONS

Separate Condition entry is allowed for each channel.

CONDITION		REQUIRED ACTION	COMPLETION TIME
A. One or more control rod position indication channels inoperable.	A.1.1 <u>ANC</u>	Suspend in vessel fuel movement.	Immediately
	A.1.2	Suspend control rod withdrawal.	Immediately
	AND	<u>)</u>	
	A.1.3	Initiate action to fully insert all insertable control rods in core cells containing one or more fuel assemblies.	Immediately
	<u>OR</u>		
			(continued)

CONDITION		REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.2.1	Initiate action to fully insert the control rod associated with the inoperable position indicator.	Immediately
	<u>AN</u> [	2	
	A.2.2	Initiate action to disarm the control rod drive associated with the fully inserted control rod.	Immediately

## SURVEILLANCE REQUIREMENTS

<u> </u>	SURVEILLANCE		
SR 3.9.4.1	Verify the channel has no "full-in" indication on each control rod that is not "full-in."	Each time the control rod is withdrawn from the "full-in" position	

## 3.9 REFUELING OPERATIONS

3.9.5 Control Rod OPERABILITY - Refueling

LCO 3.9.5 Each withdrawn control rod shall be OPERABLE.

APPLICABILITY: MODE 5.

## ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more withdrawn control rods inoperable.	A.1 Initiate action to fully insert inoperable withdrawn control rods.	Immediately

<b></b>	SURVEILLANCE	FREQUENCY
SR 3.9.5.1	Not required to be performed until 7 days after the control rod is withdrawn. Insert each withdrawn control rod at least one notch.	7 days
SR 3.9.5.2	Verify each withdrawn control rod scram accumulator pressure is ≥ 940 psig.	7 days

## 3.9 REFUELING OPERATIONS

- 3.9.6 Reactor Pressure Vessel (RPV) Water Level-Irradiated Fuel
- RPV water level shall be  $\geq$  23 ft above the top of the RPV LCO 3.9.6 flange. •
- APPLICABILITY: During movement of irradiated fuel assemblies within the RPV.

#### ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. RPV water level not within limit.	A.1	Suspend movement of irradiated fuel assemblies within the RPV.	Immediately

SURVEILLANCE		FREQUENCY
SR 3.9.6.1	Verify RPV water level is $\geq$ 23 ft above the top of the RPV flange.	24 hours

RPV Water Level - New Fuel or Control Rods 3.9.7

### 3.9 REFUELING OPERATIONS

3.9.7 Reactor Pressure Vessel (RPV) Water Level-New Fuel or Control Rods

- LCO 3.9.7 RPV water level shall be  $\geq$  23 ft above the top of irradiated fuel assemblies seated within the RPV.
- APPLICABILITY: During movement of new fuel assemblies or handling of control rods within the RPV, when irradiated fuel assemblies are seated within the RPV.

ACTIONS

CONDITION		REQUIRED ACTION	COMPLETION TIME
A. RPV water level not within limit.	A.1	Suspend movement of new fuel assemblies and handling of control rods within the RPV.	Immediately

#### SURVEILLANCE REQUIREMENTS

	FREQUENCY	
SR 3.9.7.1	Verify RPV water level is ≥ 23 ft above the top of irradiated fuel assemblies seated within the RPV.	24 hours

### 3.9 REFUELING OPERATIONS

3.9.8 Shutdown Cooling (SDC) - High Water Level

APPLICABILITY: MODE 5 with irradiated fuel in the reactor pressure vessel (RPV) and the water level  $\geq$  23 ft above the top of the RPV flange.

#### ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Required SDC subsystem inoperable.	A.1 Verify an alterna method of decay h removal is availa	leat
B. Required Action and associated Completion Time of Condition A not met.	B.1 Suspend loading irradiated fuel assemblies into t RPV. <u>AND</u>	Immediately
		(continued)

ACTIONS	
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	CONDITION		REQUIRED ACTION	COMPLETION TIME
Β.	(continued)	B.2	Initiate action to restore secondary containment to OPERABLE status.	Immediately
		AND		
		B.3	Initiate action to restore one standby gas treatment subsystem to OPERABLE status.	Immediately
		AND		
		В.4	Initiate action to restore isolation capability in each required secondary containment penetration flow path not isolated.	Immediately
С.	No SDC subsystem in operation.	C.1	Verify reactor coolant circulation by an alternate method.	1 hour from discovery of no reactor coolant circulation <u>AND</u>
				Once per
				12 hours thereafter
		<u>and</u>		
		C.2	Monitor reactor coolant temperature.	Once per hour

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	SURVEILLANCE	FREQUENCY
SR 3.9.8.1	Verify one SDC subsystem is operating.	12 hours

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#### 3.9 REFUELING OPERATIONS

3.9.9 Shutdown Cooling (SDC) - Low Water Level

LCO 3.9.9 Two SDC subsystems shall be OPERABLE, and one SDC subsystem shall be in operation. The required operating shutdown cooling subsystem may be not in operation for up to 2 hours per 8 hour period.

APPLICABILITY: MODE 5 with irradiated fuel in the reactor pressure vessel (RPV) and the water level < 23 ft above the top of the RPV flange.

ACTIONS

CONDITION		REQUIRED ACTION		COMPLETION TIME	
Α.	Separate Condition entry is allowed for each inoperable SDC subsystem. One or two required SDC subsystems inoperable.	A.1	Verify an alternate method of decay heat removal is available for the inoperable required SDC subsystem.	1 hour <u>AND</u> Once per 24 hours thereafter	
В.	Required Action and associated Completion Time of Condition A not met.	B.1 <u>AND</u>	Initiate action to restore secondary containment to OPERABLE status.	Immediately	
				(continued)	

ACTIONS

CONDITION		REQUIRED ACTION	COMPLETION TIME
B. (continued)	В.2	Initiate action to restore one standby gas treatment subsystem to OPERABLE status.	Immediately
	AND		
	B.3	Initiate action to restore isolation capability in each required secondary containment penetration flow path not isolated.	Immediately
C. No SDC subsystem in operation.	C.1	Verify reactor coolant circulation by an alternate method.	1 hour from discovery of no reactor coolant circulation
			AND
			Once per 12 hours thereafter
	<u>and</u>		
	C.2	Monitor reactor coolant temperature.	Once per hour

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SURVEILLANCE REQUIREMENTS					
	SURVEILLANCE	FREQUENCY			
SR 3.9.9.1	Verify one SDC subsystem is operating.	12 hours			

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# 3.10 SPECIAL OPERATIONS

3.10.1 Reactor Mode Switch Interlock Testing

- LCO 3.10.1 The reactor mode switch position specified in Table 1.1-1 for MODES 3, 4, and 5 may be changed to include the run, startup/hot standby, and refuel position, and operation considered not to be in MODE 1 or 2, to allow testing of instrumentation associated with the reactor mode switch interlock functions, provided:
  - a. All control rods remain fully inserted in core cells containing one or more fuel assemblies; and
  - b. No CORE ALTERATIONS are in progress.

APPLICABILITY: MODES 3 and 4 with the reactor mode switch in the run, startup/hot standby, or refuel position, MODE 5 with the reactor mode switch in the run or startup/hot standby position.

#### ACTIONS

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	One or more of the above requirements not met.	A.1	Suspend CORE ALTERATIONS except for control rod insertion.	Immediately
		<u>and</u>		
		A.2	Fully insert all insertable control rods in core cells containing one or more fuel assemblies.	1 hour
		AND		
				(continued)

ACTIONS	A	СТ	ΊC	DNS	
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-NOTE plicable in
he reactor l hour itch in the position.

		SURVEILLANCE	FREQUENCY
SR	3.10.1.1	Verify all control rods are fully inserted in core cells containing one or more fuel assemblies.	12 hours
SR	3.10.1.2	Verify no CORE ALTERATIONS are in progress.	24 hours

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# 3.10 SPECIAL OPERATIONS

3.10.2 Single Control Rod Withdrawal-Hot Shutdown

LCO 3.10.2 The reactor mode switch position specified in Table 1.1-1 for MODE 3 may be changed to include the refuel position, and operation considered not to be in MODE 2, to allow withdrawal of a single control rod, provided the following requirements are met:

- a. LCO 3.9.2, "Refuel Position One-Rod-Out Interlock";
- b. LCO 3.9.4, "Control Rod Position Indication";
- c. All other control rods are fully inserted; and
- d. 1. LCO 3.3.1.1, "Reactor Protection System (RPS) Instrumentation," MODE 5 requirements for Functions 1.a, 1.b, 7.a, 7.b, 11, and 12 of Table 3.3.1.1-1,

LCO 3.3.8.2, "Reactor Protection System (RPS) Electric Power Monitoring," MODE 5 requirements, and

LCO 3.9.5, "Control Rod OPERABILITY - Refueling,"

- <u>0R</u>
- All other control rods in a five by five array centered on the control rod being withdrawn are disarmed; at which time LCO 3.1.1, "SHUTDOWN MARGIN (SDM)," MODE 3 requirements, may be changed to allow the single control rod withdrawn to be assumed to be the highest worth control rod.

APPLICABILITY: MODE 3 with the reactor mode switch in the refuel position.

# Single Control Rod Withdrawal - Hot Shutdown 3.10.2

# ACTIONS

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Separate Condition entry is allowed for each requirement of the LCO.

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	One or more of the above requirements not met.	A.1	<ol> <li>NOTES</li> <li>Required Actions to fully insert all insertable control rods include placing the reactor mode switch in the shutdown position.</li> <li>Only applicable if the requirement not met is a required LCO.</li> </ol>	
			Enter the applicable Condition of the affected LCO.	Immediately
		<u>OR</u>		
		A.2.1	Initiate action to fully insert all insertable control rods.	Immediately
		<u>and</u>		
		A.2.2	Place the reactor mode switch in the shutdown position.	l hour

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		SURVEILLANCE	FREQUENCY
SR	3.10.2.1	Perform the applicable SRs for the required LCOs.	According to the applicable SRs
SR	3.10.2.2	Not required to be met if SR 3.10.2.1 is satisfied for LCO 3.10.2.d.1 requirements. Verify all control rods, other than the control rod being withdrawn, in a five by five array centered on the control rod being withdrawn, are disarmed.	24 hours
SR	3.10.2.3	Verify all control rods, other than the control rod being withdrawn, are fully inserted.	24 hours

# 3.10 SPECIAL OPERATIONS

3.10.3 Single Control Rod Withdrawal-Cold Shutdown

LCO 3.10.3 The reactor mode switch position specified in Table 1.1-1 for MODE 4 may be changed to include the refuel position, and operation considered not to be in MODE 2, to allow withdrawal of a single control rod, and subsequent removal of the associated control rod drive (CRD) if desired, provided the following requirements are met:

- a. All other control rods are fully inserted;
- b. 1. LCO 3.9.2, "Refuel Position One-Rod-Out Interlock," and

LCO 3.9.4. "Control Rod Position Indication,"

- OR '
- 2. A control rod withdrawal block is inserted; and
- c. 1. LCO 3.3.1.1, "Reactor Protection System (RPS) Instrumentation," MODE 5 requirements for Functions 1.a, 1.b, 7.a, 7.b, 11, and 12 of Table 3.3.1.1-1,

LCO 3.3.8.2, "Reactor Protection System (RPS) Electric Power Monitoring," MODE 5 requirements, and

LCO 3.9.5, "Control Rod OPERABILITY - Refueling,"

- <u>0R</u>
- 2. All other control rods in a five by five array centered on the control rod being withdrawn are disarmed; at which time LCO 3.1.1, "SHUTDOWN MARGIN (SDM)," MODE 4 requirements, may be changed to allow the single control rod withdrawn to be assumed to be the highest worth control rod.

APPLICABILITY: MODE 4 with the reactor mode switch in the refuel position.

# Single Control Rod Withdrawal-Cold Shutdown 3.10.3

# ACTIONS

# Separate Condition entry is allowed for each requirement of the LCO.

CONDITION		REQUIRED ACTION	COMPLETION TIME
A. One or more of the above requirements met with the affec control rod insertable.	s not	<ol> <li>NOTES</li> <li>Required Actions to fully insert all insertable control rods include placing the reactor mode switch in the shutdown position.</li> <li>Only applicable</li> </ol>	
		if the requirement not met is a required LCO.	
		Enter the applicable Condition of the affected LCO.	Immediately
	OR		
	A.2.1	Initiate action to fully insert all insertable control rods.	Immediately
	<u>AN[</u>	<u>)</u>	
	A.2.2	Place the reactor mode switch in the shutdown position.	1 hour

ACTI	CONDITION ONS		REQUIRED ACTION	COMPLETION TIME
Β.	One or more of the above requirements not met with the affected control rod not insertable.	B.1	Suspend withdrawal of the control rod and removal of associated CRD.	Immediately
		B.2.1	Initiate action to fully insert all control rods.	Immediately
		<u>OR</u>		
		B.2.2	Initiate action to satisfy the requirements of this LCO.	Immediately

	. <u> </u>	FREQUENCY	
SR	3.10.3.1	Perform the applicable SRs for the required LCOs.	According to applicable SRs
SR	3.10.3.2	Not required to be met if SR 3.10.3.1 is satisfied for LCO 3.10.3.c.1 requirements. Verify all control rods, other than the control rod being withdrawn, in a five by five array centered on the control rod being withdrawn, are disarmed.	24 hours

		SURVEILLANCE	FREQUENCY
SR	3.10.3.3	Verify all control rods, other than the control rod being withdrawn, are fully inserted.	24 hours
SR	3.10.3.4	Not required to be met if SR 3.10.3.1 is satisfied for LCO 3.10.3.b.1 requirements.	
		Verify a control rod withdrawal block is inserted.	24 hours

# 3.10 SPECIAL OPERATIONS

3.10.4 Single Control Rod Drive (CRD) Removal - Refueling

- LCO 3.10.4 The requirements of LCO 3.3.1.1, "Reactor Protection System (RPS) Instrumentation"; LCO 3.3.8.2, "Reactor Protection System (RPS) Electric Power Monitoring"; LCO 3.9.1, "Refueling Equipment Interlocks"; LCO 3.9.2, "Refuel Position One Rod Out Interlock"; LCO 3.9.4, "Control Rod Position Indication"; and LCO 3.9.5, "Control Rod OPERABILITY - Refueling," may be suspended in MODE 5 to allow the removal of a single CRD associated with a control rod withdrawn from a core cell containing one or more fuel assemblies, provided the following requirements are met:
  - a. All other control rods are fully inserted;
  - All other control rods in a five by five array centered on the withdrawn control rod are disarmed;
  - c. A control rod withdrawal block is inserted, and LCO 3.1.1, "SHUTDOWN MARGIN (SDM)," MODE 5 requirements may be changed to allow the single control rod withdrawn to be assumed to be the highest worth control rod; and
  - d. No other CORE ALTERATIONS are in progress.

APPLICABILITY: MODE 5 with LCO 3.9.5 not met.

CONDITION		REQUIRED ACTION	COMPLETION TIME
A. One or more of the above requirements not met.	A.1 <u>AND</u>	Suspend removal of the CRD mechanism.	Immediately
			(continued)

ACTIONS

Single CRD Removal - Refueling 3.10.4

ACTIONS CONDITION		REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.2.1	Initiate action to fully insert all control rods.	Immediately
	<u>OR</u> A.2.2	Initiate action to satisfy the requirements of this LCO.	Immediately

SURVEILLANCE REQUIREMENTS

		FREQUENCY	
SR	3.10.4.1	Verify all control rods, other than the control rod withdrawn for the removal of the associated CRD, are fully inserted.	24 hours
SR	3.10.4.2	Verify all control rods, other than the control rod withdrawn for the removal of the associated CRD, in a five by five array centered on the control rod withdrawn for the removal of the associated CRD, are disarmed.	24 hours
SR	3.10.4.3	Verify a control rod withdrawal block is inserted.	24 hours

SURVEILLANCE			FREQUENC	
SR	3.10.4.4	Perform SR 3.1.1.1.	According to SR 3.1.1.1	
SR	3.10.4.5	Verify no other CORE ALTERATIONS are in progress.	24 hours	

## 3.10 SPECIAL OPERATIONS

3.10.5 Multiple Control Rod Withdrawal-Refueling

- LCO 3.10.5 The requirements of LCO 3.9.3, "Control Rod Position"; LCO 3.9.4, "Control Rod Position Indication"; and LCO 3.9.5, "Control Rod OPERABILITY - Refueling," may be suspended, and the "full-in" position indicators may be bypassed for any number of control rods in MODE 5, to allow withdrawal of these control rods, removal of associated control rod drives (CRDs), or both, provided the following requirements are met:
  - a. The four fuel assemblies are removed from the core cells associated with each control rod or CRD to be removed;
  - b. All other control rods in core cells containing one or more fuel assemblies are fully inserted; and
  - c. Fuel assemblies shall only be loaded in compliance with an approved spiral reload sequence.

APPLICABILITY: MODE 5 with LCO 3.9.3, LCO 3.9.4, or LCO 3.9.5 not met.

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	One or more of the above requirements not met.	A.1	Suspend withdrawal of control rods and removal of associated CRDs.	Immediately
		<u>AND</u> A.2 AND	Suspend loading fuel assemblies.	Immediately
				(continued)

ACTIONS

CONDITION		REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.3.1	Initiate action to fully insert all control rods in core cells containing one or more fuel assemblies.	Immediately
	<u>OR</u>		
	A.3.2	Initiate action to satisfy the requirements of this LCO.	Immediately

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SR	3.10.5.1	Verify the four fuel assemblies are removed from core cells associated with each control rod or CRD removed.	24 hours
SR .	3.10.5.2	Verify all other control rods in core cells containing one or more fuel assemblies are fully inserted.	24 hours
SR	3.10.5.3	Only required to be met during fuel loading. Verify fuel assemblies being loaded are in compliance with an approved spiral reload sequence.	24 hours

Control Rod Testing-Operating 3.10.6

#### 3.10 SPECIAL OPERATIONS

# 3.10.6 Control Rod Testing-Operating

- LCO 3.10.6 The requirements of LCO 3.1.6, "Rod Pattern Control," may be suspended to allow performance of SDM demonstrations, control rod scram time testing, and control rod friction testing, provided:
  - a. The analyzed rod position sequence requirements of SR 3.3.2.1.8 are changed to require the control rod sequence to conform to the specified test sequence.
  - <u>0R</u>
  - b. The RWM is bypassed; the requirements of LCO 3.3.2.1, "Control Rod Block Instrumentation," Function 2 are suspended; and conformance to the approved control rod sequence for the specified test is verified by a second licensed operator or other qualified member of the technical staff.

APPLICABILITY: MODES 1 and 2 with LCO 3.1.6 not met.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Requirements of the LCO not met.	A.1 Suspend performance of the test and exception to LCO 3.1.6.	Immediately

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SURVEILLANCE REQUIREMENTS

		SURVEILLANCE	FREQUENCY
SR	3.10.6.1	Not required to be met if SR 3.10.6.2 satisfied. Verify movement of control rods is in compliance with the approved control rod sequence for the specified test by a second licensed operator or other qualified member of the technical staff.	During control rod movement
SR	3.10.6.2	Not required to be met if SR 3.10.6.1 satisfied. Verify control rod sequence input to the RWM is in conformance with the approved control rod sequence for the specified test.	Prior to control rod movement

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#### 3.10 SPECIAL OPERATIONS

# 3.10.7 SHUTDOWN MARGIN (SDM) Test-Refueling

LCO 3.10.7 The reactor mode switch position specified in Table 1.1-1 for MODE 5 may be changed to include the startup/hot standby position, and operation considered not to be in MODE 2, to allow SDM testing, provided the following requirements are met:

- a. LCO 3.3.1.1, "Reactor Protection System (RPS) Instrumentation," MODE 2 requirements for Functions 2.a and 2.d of Table 3.3.1.1-1;
- LCO 3.3.2.1, "Control Rod Block Instrumentation," MODE 2 requirements for Function 2 of Table 3.3.2.1-1, with the analyzed rod position sequence requirements of SR 3.3.2.1.8 changed to require the control rod sequence to conform to the SDM test sequence,
  - <u> 0 R</u>
  - Conformance to the approved control rod sequence for the SDM test is verified by a second licensed operator or other qualified member of the technical staff;
- Each withdrawn control rod shall be coupled to the associated CRD;
- All control rod withdrawals during out of sequence control rod moves shall be made in the single notch withdrawal mode;
- e. No other CORE ALTERATIONS are in progress; and
- f. CRD charging water header pressure  $\geq$  940 psig.

APPLICABILITY: MODE 5 with the reactor mode switch in startup/hot standby position.

ACTI	ONS	
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CONDITION		REQUIRED ACTION		COMPLETION TIME	
Α.	Separate Condition entry is allowed for each control rod. One or more control rods not coupled to its associated CRD.	Rod wor bypasse LCO 3.3 Block I require of inop	<pre>h minimizer may be d as allowed by .2.1, "Control Rod nstrumentation," if d, to allow insertion erable control rod and ed operation. Fully insert inoperable control rod. Disarm the associated CRD.</pre>	3 hours 4 hours	
в.	One or more of the above requirements not met for reasons other than Condition A.	B.1	Place the reactor mode switch in the shutdown or refuel position.	Immediately	

	FREQUENCY	
SR 3.10.7.1	Perform the MODE 2 applicable SRs for LCO 3.3.1.1, Functions 2.a and 2.d of Table 3.3.1.1-1.	According to the applicable SRs

(continued)

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		SURVEILLANCE	FREQUENCY
SR	Not requ	Not required to be met if SR 3.10.7.3 satisfied.	
		Perform the MODE 2 applicable SRs for LCO 3.3.2.1, Function 2 of Table 3.3.2.1-1.	According to the applicable SRs
SR	3.10.7.3	Not required to be met if SR 3.10.7.2 satisfied.	
		Verify movement of control rods is in compliance with the approved control rod sequence for the SDM test by a second licensed operator or other qualified member of the technical staff.	During control rod movement
SR	3.10.7.4	Verify no other CORE ALTERATIONS are in progress.	12 hours

<u></u>	FREQUENCY	
SR 3.10.7.5	Verify each withdrawn control rod does not go to the withdrawn overtravel position.	Each time the control rod is withdrawn to "full out" position <u>AND</u> Prior to satisfying LCO 3.10.7.c requirement after work on control rod or CRD System that could affect coupling
SR 3.10.7.6	Verify CRD charging water header pressure ≥ 940 psig.	7 days

# 4.0 DESIGN FEATURES

# 4.1 Site Location

# 4.1.1 <u>Site and Exclusion Area Boundaries</u>

The site area boundary follows the Illinois River to the north, the Kankakee River to the east, a country road from Divine extended eastward to the Kankakee River on the south, and the Elgin, Joliet, and Eastern Railway right-of-way on the west. The exclusion area boundary shall be an 800 meter radius from the centerline of the reactor vessels.

# 4.1.2 Low Population Zone

The low population zone shall be a five mile radius from the centerline of the reactor vessels.

#### 4.2 Reactor Core

#### 4.2.1 Fuel Assemblies

The reactor shall contain 724 fuel assemblies. Each assembly shall consist of a matrix of Zircaloy clad fuel rods with an initial composition of natural or slightly enriched uranium dioxide  $(UO_2)$  as fuel material. The assemblies may contain water rods or a water box. Limited substitutions of Zircaloy, ZIRLO, or stainless steel filler rods for fuel rods, in accordance with approved applications of fuel rod configurations, may be used. Fuel assemblies shall be limited to those fuel designs that have been analyzed with NRC staff approved codes and methods and have been shown by tests or analyses to comply with all safety design bases. A limited number of lead test assemblies that have not completed representative testing may be placed in nonlimiting core regions.

# 4.2.2 <u>Control Rod Assemblies</u>

The reactor core shall contain 177 cruciform shaped control rod assemblies. The control material shall be boron carbide and hafnium metal as approved by the NRC.

# 4.0 DESIGN FEATURES (continued)

# 4.3 Fuel Storage

# 4.3.1 Criticality

- 4.3.1.1 The spent fuel storage racks are designed and shall be maintained with:
  - a.  $k_{eff} \leq 0.95$  if fully flooded with unborated water, which includes an allowance for uncertainties as described in Section 9.1.2 of the UFSAR; and
  - b. A nominal 6.30 inch center to center distance between fuel assemblies placed in the storage racks.

#### 4.3.2 Drainage

The spent fuel storage pool is designed and shall be maintained to prevent inadvertent draining of the pool below elevation 589 ft 2.5 inches.

# 4.3.3 <u>Capacity</u>

The spent fuel storage pool is designed and shall be maintained with a storage capacity limited to no more than 3537 fuel assemblies.

# 5.1 Responsibility

- 5.1.1 The station manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.
- 5.1.2 A unit supervisor shall be responsible for the control room command function (Since the control room is common to both units, the control room command function for both units can be satisfied by a single unit supervisor). During any absence of the unit supervisor from the control room while the unit is in MODE 1, 2, or 3, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the unit supervisor from the control room while the unit is in MODE 4 or 5 or defueled, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.

# 5.2 Organization

#### 5.2.1 <u>Onsite and Offsite Organizations</u>

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements, including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications, shall be documented in the Quality Assurance Manual.
- b. The station manager shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. A corporate officer shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff, or perform radiation protection or quality assurance functions, may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

# 5.2.2 <u>Unit Staff</u>

The unit staff organization shall include the following:

# 5.2 Organization

# 5.2.2 <u>Unit Staff</u> (continued)

- a. A total of three non-licensed operators for the two units is required in all conditions. At least one of the required non-licensed operators shall be assigned to each unit.
- b. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and Specifications 5.2.2.a and 5.2.2.f for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.
- c. A radiation protection technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.
- d. The amount of overtime worked by unit staff members performing safety related functions shall be limited and controlled in accordance with the NRC Policy Statement on working hours (Generic Letter 82-12).
- e. The operations manager or shift operations supervisor shall hold an SRO license.
- f. The Shift Technical Advisor (STA) shall provide advisory technical support to the shift manager in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. In addition, the STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

# 5.3 Unit Staff Qualifications

5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971, except for the radiation protection manager, who shall meet or exceed the qualifications for "Radiation Protection Manager" in Regulatory Guide 1.8, September 1975.

#### 5.4 Procedures

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- 5.4.1 Written procedures shall be established, implemented, and maintained covering the following activities:
  - a. The applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978;
  - b. The emergency operating procedures required to implement the requirements of NUREG-0737 and NUREG-0737, Supplement 1, as stated in Generic Letter 82-33, Section 7.1;
  - c. Fire Protection Program implementation; and
  - d. All programs specified in Specification 5.5.

# 5.5 Programs and Manuals

The following programs shall be established, implemented and maintained.

#### 5.5.1 <u>Offsite Dose Calculation Manual (ODCM)</u>

- a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program; and
- b. The ODCM shall also contain the radioactive effluent controls and radiological environmental monitoring activities, and descriptions of the information that should be included in the Annual Radiological Environmental Operating, and Radioactive Effluent Release Reports required by Specification 5.6.2 and Specification 5.6.3.
- c. Licensee initiated changes to the ODCM:
  - 1. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
    - (a) Sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s), and
    - (b) A determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and do not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations;
  - Shall become effective after the approval of the station manager; and
  - 3. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and

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# 5.5 Programs and Manuals

# 5.5.1 Offsite Dose Calculation Manual (ODCM) (continued)

shall indicate the date (i.e., month and year) the change was implemented.

# 5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include the Core Spray, High Pressure Coolant Injection, Low Pressure Coolant Injection, Isolation Condenser, Shutdown Cooling, Reactor Water Cleanup, process sampling, containment monitoring, and Standby Gas Treatment. The program shall include the following:

- a. Preventive maintenance and periodic visual inspection requirements; and
- b. Integrated leak test requirements for each system at 24 month intervals.

The provisions of SR 3.0.2 are applicable to the 24 month Frequency for performing integrated system leak test activities.

#### 5.5.3 Post Accident Sampling

This program provides controls that ensure the capability to obtain and analyze reactor coolant, radioactive iodines, and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

- a. Training of personnel;
- b. Procedures for sampling and analysis; and
- c. Provisions for maintenance of sampling and analysis equipment.

#### 5.5 Programs and Manuals

# 5.5.4 Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;
- Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to ten times the concentration values in Appendix B, Table 2, Column 2 to 10 CFR 20.1001-20.2402;
- c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM;
- d. Limitations on the annual and quarterly doses or dose commitment to a member of the public from radioactive materials in liquid effluents released from each unit to unrestricted areas, conforming to 10 CFR 50, Appendix I;
- e. Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days;
- f. Limitations on the functional capability and use of the liquid and gaseous effluent treatment, systems to ensure that appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a period of 31 days would exceed 2% of the guidelines for the annual dose or dose commitment, conforming to 10 CFR 50, Appendix I;
- g. Limitations on the dose rate resulting from radioactive material released in gaseous effluents from the site to areas at or beyond the site boundary shall be in accordance with the following:

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#### 5.5 Programs and Manuals

# 5.5.4 Radioactive\_Effluent Controls\_Program (continued)

- 1. For noble gases: a dose rate  $\leq$  500 mrems/yr to the whole body and a dose rate  $\leq$  3000 mrems/yr to the skin, and
- For iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days: a dose rate ≤ 1500 mrems/yr to any organ;
- h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I;
- i. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives > 8 days in gaseous effluents released from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I; and
- j. Limitations on the annual dose or dose commitment to any member of the public, beyond the site boundary, due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Radioactive Effluents Control Program Surveillance Frequencies.

#### 5.5.5 Component Cyclic or Transient Limit

This program provides controls to track the UFSAR Section 3.9, cyclic and transient occurrences to ensure that components are maintained within the design limits.

# 5.5.6 <u>Inservice Testing Program</u>

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 pumps and valves.

a. Testing Frequencies specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda are as follows:

5.5.6	<u>Inservice Testing Program</u>	(continued)
	ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice testing	Required Frequencies for performing inservice
	<u>activities</u>	testing activities
	Weekly	At least once per 7 days
	Monthly Quarterly or every	At least once per 31 days
	3 months Semiannually or	At least once per 92 days
	every 6 months	At least once per 184 days
	Every 9 months	At least once per 276 days
	Yearly or annually Biennially or every	At least once per 366 days
	2 years	At least once per 731 days
	Every 48 months	At least once per 1461 days

- b. The provisions of SR 3.0.2 are applicable to the above required Frequencies for performing inservice testing activities;
- c. The provisions of SR 3.0.3 are applicable to inservice testing activities; and
- d. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any TS.

## 5.5.7 <u>Ventilation Filter Testing Program (VFTP)</u>

The VFTP shall establish the required testing of Engineered Safety Feature (ESF) filter ventilation systems. Tests described in Specification 5.5.7.a and 5.5.7.b shall be performed once per 24 months; after each complete or partial replacement of the HEPA filter bank or charcoal adsorber bank; after any structural maintenance on the HEPA filter bank or charcoal adsorber bank housing; and, following painting, fire, or chemical release in any ventilation zone communicating with the subsystem while it is in operation that could adversely affect the filter bank or charcoal adsorber capability.

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#### 5.5.7 Ventilation Filter Testing Program (VFTP) (continued)

Tests described in Specification 5.5.7.c shall be performed once per 24 months; after 720 hours of adsorber operation; after any structural maintenance on the charcoal adsorber bank housing; and, following painting, fire, or chemical release in any ventilation zone communicating with the subsystem while it is in operation that could adversely affect the charcoal adsorber capability.

Tests described in Specification 5.5.7.d and 5.5.7.e shall be performed once per 24 months.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the VFTP test frequencies.

a. Demonstrate for each of the ESF systems that an inplace test of the HEPA filters shows a penetration and system bypass specified below when tested in accordance with Regulatory Guide 1.52, Revision 2, and ANSI/ASME N510-1980 at the system flowrate specified below:

<u>ESF Ventilation</u> <u>System</u>	<u>Penetration</u>	Flowrate
Standby Gas Treatment (SGT) System	< 1.0%	<u>&gt;</u> 3600 cfm and <u>&lt;</u> 4400 cfm
Control Room Emergency Ventilation (CREV) System	< 0.05%	≥ 1800 scfm and <u>≤</u> 2200 scfm

b. Demonstrate for each of the ESF systems that an inplace test of the charcoal adsorber shows a penetration and system bypass specified below when tested in accordance with Regulatory Guide 1.52, Revision 2, and ANSI/ASME N510-1980 at the system flowrate specified below:

5.5.7	<u>Ventilation Filter Testing Progr</u> <u>ESF Ventilation</u>	<u></u>	cinued)
	<u>System</u>	<u>Penetration</u>	<u>Flowrate</u>
	Standby Gas Treatment (SGT) System	< 1.0%	<u>&gt;</u> 3600 cfm and <u>&lt;</u> 4400 cfm
	Control Room Emergency Ventilation (CREV) System	< 0.05%	<u>&gt;</u> 1800 scfm and <u>&lt;</u> 2200 scfm
	c. Demonstrate for each of the		

c. Demonstrate for each of the ESF systems that a faboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 2, shows the methyl iodide penetration less than the value specified below when tested in accordance with ASTM D3803-1989 at a temperature of 30°C and relative humidity (RH) specified below:

<u>ESF Ventilation</u> <u>System</u>	<u>Penetration</u>	<u>RH</u>
Standby Gas Treatment (SGT) System	2.5%	70%
Control Room Emergency Ventilation (CREV) System	0.5%	70%

d. Demonstrate for each of the ESF systems that the pressure drop across the combined HEPA filters and the charcoal adsorbers is less than the value specified below when tested at the system flowrate specified as follows:

<u>ESF Ventilation</u> <u>System</u>	<u>Delta P</u>	<u>Flowrate</u>
Standby Gas Treatment (SGT) System	< 6 inches water guage	<u>&gt;</u> 3600 cfm and <u>≺</u> 4400 cfm
Control Room Emergency Ventilation (CREV) System	< 6 inches water guage	≥ 1800 scfm and ≤ 2200 scfm

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## 5.5.7 Ventilation Filter Testing Program (VFTP) (continued)

e. Demonstrate that the heaters for each of the ESF systems dissipate the value, corrected for voltage variations at the 480 V bus, specified below when tested in accordance with ANSI/ASME N510-1989:

<u>ESF Ventilation System</u>	<u>Wattage</u>
Standby Gas Treatment (SGT)	<u>&gt;</u> 27 kW and
System	<u>&lt;</u> 33 kW
Control Room Emergency	<u>&gt;</u> 10.8 kW and
Ventilation (CREV) System	<u>≺</u> 13.2 kW

# 5.5.8 Explosive Gas and Storage Tank Radioactivity Monitoring Program

This program provides controls for potentially explosive gas mixtures contained in the Off-Gas System and the quantity of radioactivity contained in unprotected outdoor liquid storage tanks.

The program shall include:

- a. The limits for concentrations of hydrogen in the Off-Gas System and a surveillance program to ensure the limits are maintained. Such limits shall be appropriate to the system's design criteria (i.e., whether or not the system is designed to withstand a hydrogen explosion); and
- b. A surveillance program to ensure that the quantity of radioactivity contained in all outdoor liquid radwaste tanks that are not surrounded by liners, dikes, or walls, capable of holding the tanks' contents and that do not have tank overflows and surrounding area drains connected to the Liquid Waste Management System is  $\leq 0.7$  curies in each tank and  $\leq 3.0$  curies total in all tanks, which is less than the amount that would result in concentrations less than the limits of 10 CFR 20, Appendix B, Table 2, Column 2, at the nearest potable water supply and the nearest surface water supply in an unrestricted area, in the event of an uncontrolled release of the tanks' contents.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Explosive Gas and Storage Tank Radioactivity Monitoring Program Surveillance Frequencies.

#### 5.5.9 Diesel Fuel Oil Testing Program

A diesel fuel oil testing program shall establish the required testing of both new fuel oil and stored fuel oil. The program shall include sampling and testing requirements, and acceptance criteria, all in accordance with applicable ASTM Standards. The purpose of the program is to establish the following:

- a. Acceptability of new fuel oil for use prior to addition to storage tanks by determining that the fuel oil has:
  - 1. An API gravity or an absolute specific gravity within limits,
  - 2. A flash point and kinematic viscosity within limits,
  - 3. A clear and bright appearance with proper color or water and sediment within limits;
- b. Within 31 days following addition of the new fuel oil to storage tanks verify that the properties of the new fuel oil, other than those addressed in a., above, are within limits; and
- c. Total particulate concentration of the fuel oil in the storage tanks is  $\leq 10 \text{ mg/l}$  when tested every 31 days in accordance with the applicable ASTM Standard.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Diesel Fuel Oil Testing Program test frequencies.

#### 5.5.10 Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

- a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.
- b. Licensees may make changes to Bases without prior NRC approval provided the changes do not require either of the following:
  - 1. A change in the TS incorporated in the license; or

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#### 5.5.10 Technical Specifications (TS) Bases Control Program (continued)

- 2. A change to the UFSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59.
- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the UFSAR.
- d. Proposed changes that meet the criterion of Specification 5.5.10.b.1 or 5.5.10.b.2 above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e).

#### 5.5.11 <u>Safety Function Determination Program (SFDP)</u>

This program ensures loss of safety function is detected and appropriate actions taken. Upon entry into LCO 3.0.6, an evaluation shall be made to determine if loss of safety function exists. Additionally, other appropriate limitations and remedial or compensatory actions may be identified to be taken as a result of the support system inoperability and corresponding exception to entering supported system Condition and Required Actions. This program implements the requirements of LCO 3.0.6.

a. The SFDP shall contain the following:

- 1. Provisions for cross division checks to ensure a loss of the capability to perform the safety function assumed in the accident analysis does not go undetected;
- 2. Provisions for ensuring the plant is maintained in a safe condition if a loss of function condition exists;
- Provisions to ensure that an inoperable supported system's Completion Time is not inappropriately extended as a result of multiple support system inoperabilities; and
- 4. Other appropriate limitations and remedial or compensatory actions.

#### 5.5.11 Safety Function Determination Program (SFDP) (continued)

- b. A loss of safety function exists when, assuming no concurrent single failure, and assuming no concurrent loss of offsite power or loss of onsite diesel generator(s), a safety function assumed in the accident analysis cannot be performed. For the purpose of this program, a loss of safety function may exist when a support system is inoperable, and:
  - 1. A required system redundant to system(s) supported by the inoperable support system is also inoperable; or
  - A required system redundant to system(s) in turn supported by the inoperable supported system is also inoperable; or
  - 3. A required system redundant to support system(s) for the supported systems described in b.1 and b.2 above is also inoperable.
- c. The SFDP identifies where a loss of safety function exists. If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered. When a loss of safety function is caused by the inoperability of a single Technical Specification support system, the appropriate Conditions and Required Actions to enter are those of the support system.

#### 5.5.12 Primary Containment Leakage Rate Testing Program

- a. This program shall establish the leakage testing of the primary containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemption. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Testing Program," dated September 1995.
- b. The peak calculated primary containment internal pressure for the design basis loss of coolant accident,  $P_a$ , is 48 psig.

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# 5.5.12 Primary Containment Leakage Rate Testing Program (continued)

- c. The maximum allowable primary containment leakage rate,  $\mathsf{L}_{\mathsf{a}},$  at  $\mathsf{P}_{\mathsf{a}},$  is 1.6% of primary containment air weight per day.
- d. Leakage rate acceptance criteria are:
  - 1. Primary containment overall leakage rate acceptance criterion is  $\leq 1.0 L_a$ . During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are  $\leq 0.60 L_a$  for the combined Type B and Type C tests, and  $\leq 0.75 L_a$  for Type A tests.
  - 2. Air lock testing acceptance criteria is the overall air lock leakage rate is  $\leq$  0.05 L, when tested at  $\geq$  P.
- e. The provisions of SR 3.0.3 are applicable to the Primary Containment Leakage Rate Testing Program.

#### 5.0 ADMINISTRATIVE CONTROLS

#### 5.6 Reporting Requirements

The following reports shall be submitted in accordance with 10 CFR 50.4.

## 5.6.1 Occupational Radiation Exposure Report

A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.

A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors), for whom monitoring was performed, receiving an annual deep dose equivalent > 100 mrem and the associated collective deep dose equivalent (reported in man-rem) according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket ionization chamber, thermoluminescence dosimeter (TLD), or electronic dosimeter measurements. Small exposures totaling < 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total deep dose equivalent received from external sources should be assigned to specific major work functions. The report covering the previous calendar year shall be submitted by April 30 of each year.

#### 5.6.2 Annual Radiological Environmental Operating Report

A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual

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#### 5.6 Reporting Requirements

5.6.2 Annual Radiological Environmental Operating Report (continued)

(ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

## 5.6.3 Radioactive Effluent Release Report

A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

The Radioactive Effluent Release Report covering the operation of the unit shall be submitted prior to May 1 of each year in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and the Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR 50, Appendix I, Section IV.B.1.

#### 5.6.4 Monthly Operating Reports

Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the safety and relief valves, shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.

#### 5.6.5 CORE OPERATING LIMITS REPORT (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:
  - 1. The APLHGR for Specification 3.2.1.
  - 2. The MCPR for Specification 3.2.2.

#### 5.6 Reporting Requirements

## 5.6.5 CORE OPERATING LIMITS REPORT (COLR) (continued)

- 3. The LHGR for Specification 3.2.3.
- 4. The LHGR and transient linear heat generation rate limit for Specification 3.2.4.
- 5. Control Rod Block Instrumentation Setpoint for the Rod Block Monitor-Upscale Function Allowable Value for Specification 3.3.2.1.
- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:
  - 1. ANF-1125(P)(A), "Critical Power Correlation ANFB."
  - ANF-524(P)(A), "ANF Critical Power Methodology for Boiling Water Reactors."
  - 3. XN-NF-79-71(P)(A), "Exxon Nuclear Plant Transient Methodology for Boiling Water Reactors."
  - 4. XN-NF-80-19(P)(A), "Exxon Nuclear Methodology for Boiling Water Reactors."
  - 5. XN-NF-85-67(P)(A), "Generic Mechanical Design for Exxon Nuclear Jet Pump Boiling Water Reactors Reload Fuel."
  - 6. ANF-913(P)(A), "CONTRANSA2: A Computer Program for Boiling Water Reactor Transient Analysis."
  - 7. XN-NF-82-06(P)(A), Qualification of Exxon Nuclear Fuel for Extended Burnup Supplement 1 Extended Burnup Qualification of ENC 9x9 BWR Fuel.
  - 8. ANF-89-14(P)(A), Advanced Nuclear Fuels Corporation Generic Mechanical Design for Advance Nuclear Fuels Corporation 9x9-IX and 9x9-9X BWR Reload Fuel.

#### 5.6 Reporting Requirements

#### 5.6.5 CORE OPERATING LIMITS REPORT (COLR) (continued)

- 9. ANF-89-98(P)(A), Generic Mechanical Design Criteria for BWR Fuel Designs.
- 10. ANF-91-048(P)(A), Advanced Nuclear Fuels Corporation Methodology for Boiling Water Reactors EXEM BWR Evaluation Model.
- 11. Commonwealth Edison Company Topical Report NFSR-0091, "Benchmark of CASMO/MICROBURN BWR Nuclear Design Methods."
- 12. EMF-85-74(P), RODEX2A (BWR) Fuel Rod Thermal Mechanical Evaluation Model.

The COLR will contain the complete identification for each of the TS referenced topical reports used to prepare the COLR (i.e., report number, title, revision, date, and any supplements).

- c. The core operating limits shall be determined such that all applicable limits (e.g., fuel thermal mechanical limits, core thermal hydraulic limits, Emergency Core Cooling Systems (ECCS) limits, nuclear limits such as SDM, transient analysis limits, and accident analysis limits) of the safety analysis are met.
- d. The COLR, including any midcycle revisions or supplements, shall be provided upon issuance for each reload cycle to the NRC.

#### 5.6.6 Post Accident Monitoring (PAM) Instrumentation Report

When a report is required by Condition B or F of LCO 3.3.3.1, "Post Accident Monitoring (PAM) Instrumentation," a report shall be submitted within the following 14 days. The report shall outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status.

#### 5.0 ADMINISTRATIVE CONTROLS

#### 5.7 High Radiation Area

5.7.1 Pursuant to 10 CFR 20, paragraph 20.1601(c), in lieu of the requirements of 10 CFR 20.1601, each high radiation area, as defined in 10 CFR 20, in which the intensity of radiation is > 100 mrem/hr at 30 cm (12 in.), shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP) (or equivalent document). Individuals qualified in radiation protection procedures (e.g., radiation protection technicians) or personnel escorted by such individuals may be exempt from the RWP issuance requirement during the performance of their assigned duties, provided they are otherwise following plant radiation protection procedures for entry into high radiation areas.

Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device that continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device that continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel are aware of them.
- c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified in the RWP (or equivalent document).
- 5.7.2 In addition to the requirements of Specification 5.7.1, areas accessible to personnel with radiation levels > 1000 mrem/hr at 30 cm (12 in.) from the radiation source or from any surface which the radiation penetrates shall require the following:
  - a. Doors shall be locked to prevent unauthorized entry and shall not prevent individuals from leaving the area. In place of locking the door, direct or electronic surveillance

#### 5.7 High Radiation Area

## 5.7.2 (continued)

that is capable of preventing unauthorized entry may be used. The keys shall be maintained under the administrative control of the shift manager on duty or radiation protection supervision.

- b. Personnel access and exposure control requirements of activities being performed within these areas shall be specified by an approved RWP (or equivalent document).
- c. Each person entering the area shall be provided with an alarming radiation monitoring device that continuously integrates the radiation dose rate (such as an electronic dosimeter). Surveillance and radiation monitoring by a radiation protection technician may be substituted for an alarming dosimeter.
- 5.7.3 For individual high radiation areas with radiation levels of > 1000 mrem/hr at 30 cm (12 in.), accessible to personnel, that are located within large areas where no enclosure exists for purposes of locking, and where no enclosure can be reasonably constructed around the individual area, that individual area shall be barricaded and conspicuously posted, and a flashing light shall be activated as a warning device.

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#### B 2.0 SAFETY LIMITS (SLS)

B 2.1.1 Reactor Core SLs

BASES

BACKGROUND UFSAR Section 3.1.2.2.1 (Ref. 1) requires, and SLs ensure, that specified acceptable fuel design limits are not exceeded during steady state operation, normal operational transients, and anticipated operational occurrences (AOOs).

> The fuel cladding integrity SL is set such that no significant fuel damage is calculated to occur if the limit is not violated. Because fuel damage is not directly observable, a stepback approach is used to establish an SL, such that the MCPR is not less than the limit specified in Specification 2.1.1.2. MCPR greater than the specified limit represents a conservative margin relative to the conditions required to maintain fuel cladding integrity.

The fuel cladding is one of the physical barriers that separate the radioactive materials from the environs. The integrity of this cladding barrier is related to its relative freedom from perforations or cracking. Although some corrosion or use related cracking may occur during the life of the cladding, fission product migration from this source is incrementally cumulative and continuously measurable. Fuel cladding perforations, however, can result from thermal stresses, which occur from reactor operation significantly above design conditions.

While fission product migration from cladding perforation is just as measurable as that from use related cracking, the thermally caused cladding perforations signal a threshold beyond which still greater thermal stresses may cause gross, rather than incremental, cladding deterioration. Therefore, the fuel cladding SL is defined with a margin to the conditions that would produce onset of transition boiling (i.e., MCPR = 1.00). These conditions represent a significant departure from the condition intended by design for planned operation. The MCPR fuel cladding integrity SL ensures that during normal operation and during AOOs, at least 99.9% of the fuel rods in the core do not experience transition boiling.

	The reactor vessel water level SL ensures that adequate core cooling capability is maintained during all MODES of reactor operation. Establishment of Emergency Core Cooling System initiation setpoints higher than this SL provides margin such that the SL will not be reached or exceeded.		
APPLICABLE SAFETY ANALYSES	The fuel cladding must not sustain damage as a result of normal operation and AOOs. The reactor core SLs are established to preclude violation of the fuel design		

BASES

BACKGROUND

(continued)

The fuel cladding must not sustain damage as a result of normal operation and AOOs. The reactor core SLs are established to preclude violation of the fuel design criterion that a MCPR limit is to be established, such that at least 99.9% of the fuel rods in the core would not be expected to experience the onset of transition boiling.

Operation above the boundary of the nucleate boiling regime

could result in excessive cladding temperature because of

the onset of transition boiling and the resultant sharp reduction in heat transfer coefficient. Inside the steam film, high cladding temperatures are reached, and a cladding

water (zirconium water) reaction may take place. This chemical reaction results in oxidation of the fuel cladding to a structurally weaker form. This weaker form may lose its integrity, resulting in an uncontrolled release of

activity to the reactor coolant.

The Reactor Protection System setpoints (LCO 3.3.1.1, "Reactor Protection System (RPS) Instrumentation"), in combination with the other LCOs, are designed to prevent any anticipated combination of transient conditions for Reactor Coolant System water level, pressure, and THERMAL POWER level that would result in reaching the MCPR Safety Limit.

Cores with fuel that is all from one vendor utilize that vendor's critical power correlation for determination of MCPR. For cores with fuel from more than one vendor, the MCPR is calculated for all fuel in the core using the licensed critical power correlations. This may be accomplished by using each vendor's correlation for the vendor's respective fuel. Alternatively, a single correlation can be used for all fuel in the core. For fuel that has not been manufactured by the vendor supplying the critical power correlation are adjusted using benchmarking data to yield conservative results compared with the critical power results from the co-resident fuel.

## 2.1.1.1 Fuel Cladding Integrity

APPLICABLE SAFETY ANALYSES (continued)

The use of the Siemens Power Corporation correlation (ANFB) is valid for critical power calculations at pressures > 600 psia and bundle mass fluxes > 0.1 x 10<sup>6</sup> lb/hr-ft<sup>2</sup> (Refs. 2 and 3). For operation at low pressures or low flows, the fuel cladding integrity SL is established by a limiting condition on core THERMAL POWER, with the following basis:

> Since the pressure drop in the bypass region is essentially all elevation head, the core pressure drop at low power and flows will always be > 4.5 psi. Analyses show that with a bundle flow of 28 x 10<sup>3</sup> lb/hr (approximately a mass velocity of  $0.25 \times 10^6$  lb/hr-ft<sup>2</sup>), bundle pressure drop is nearly independent of bundle power and has a value of 3.5 psi. Thus, the bundle flow with a 4.5 psi driving head will be > 28 x  $10^3$  lb/hr. Full scale critical power test data taken at pressures from 14.7 psia to 800 psia indicate that the fuel assembly critical power at this flow is approximately 3.35 MWt. With the design peaking factors, this corresponds to a THERMAL POWER > 50 % RTP. Thus, a THERMAL POWER limit of 25% RTP for reactor pressure < 785 psig is conservative. Although the ANFB correlation is valid at reactor steam dome pressures > 600 psia, application of the fuel cladding integrity SL at reactor steam dome pressure < 785 psig is conservative.

## 2.1.1.2 MCPR

The MCPR SL ensures sufficient conservatism in the operating MCPR limit that, in the event of an AOO from the limiting condition of operation, at least 99.9% of the fuel rods in the core would be expected to avoid boiling transition. The margin between calculated boiling transition (i.e., MCPR = 1.00) and the MCPR SL is based on a detailed statistical procedure that considers the uncertainties in monitoring the core operating state. One specific uncertainty included in the SL is the uncertainty inherent

BASES

SAFETY ANALYSES

APPLICABLE <u>2.1.1.2</u> <u>MCPR</u> (continued)

in the ANFB critical power correlation. References 2, 3, and 4 describe the methodology used in determining the MCPR SL.

The ANFB critical power correlation is based on a significant body of practical test data, providing a high degree of assurance that the critical power, as evaluated by the correlation, is within a small percentage of the actual critical power being estimated. As long as the core pressure and flow are within the range of validity of the ANFR correlation, the assumed reactor conditions used in defining the SL introduce conservatism into the limit because bounding high radial power factors and bounding flat local peaking distributions are used to estimate the number of rods in boiling transition. Still further conservatism is induced by the tendency of the ANFB correlation to overpredict the number of rods in boiling transition. These conservatisms and the inherent accuracy of the ANFB correlation provide a reasonable degree of assurance that there would be no transition boiling in the core during sustained operation at the MCPR SL. If boiling transition were to occur, there is reason to believe that the integrity of the fuel would not be compromised. Significant test data accumulated by the NRC and private organizations indicate that the use of a boiling transition limitation to protect against cladding failure is a very conservative approach. Much of the data indicate that BWR fuel can survive for an extended period of time in an environment of boiling transition.

## 2.1.1.3 Reactor Vessel Water Level

During MODES 1 and 2 the reactor vessel water level is required to be above the top of the active irradiated fuel to provide core cooling capability. With fuel in the reactor vessel during periods when the reactor is shut down, consideration must be given to water level requirements due to the effect of decay heat. If the water level should drop below the top of the active irradiated fuel during this period, the ability to remove decay heat is reduced. This

BASES

APPLICABLE SAFETY ANALYSES 2.1.1.3 <u>Reactor Vessel Water Level</u> (continued) reduction in cooling capability could lead to elevated cladding temperatures and clad perforation in the event that the water level becomes < 2/3 of the core height. The reactor vessel water level SL has been established at the top of the active irradiated fuel to provide a point that can be monitored and to also provide adequate margin for effective action.

- SAFETY LIMITS The reactor core SLs are established to protect the integrity of the fuel clad barrier to prevent the release of radioactive materials to the environs. SL 2.1.1.1 and SL 2.1.1.2 ensure that the core operates within the fuel design criteria. SL 2.1.1.3 ensures that the reactor vessel water level is greater than the top of the active irradiated fuel in order to prevent elevated clad temperatures and resultant clad perforations.
- APPLICABILITY SLs 2.1.1.1, 2.1.1.2, and 2.1.1.3 are applicable in all MODES.

SAFETY LIMIT 2.2 VIOLATIONS Exceeding an SL may cause fuel damage and create a potential for radioactive releases in excess of 10 CFR 100, "Reactor Site Criteria," limits (Ref. 5). Therefore, it is required to insert all insertable control rods and restore compliance with the SLs within 2 hours. The 2 hour Completion Time ensures that the operators take prompt remedial action and also ensures that the probability of an accident occurring during this period is minimal.

## BASES (continued)

REFERENCES	1.	UFSAR, Section 3.1.2.2.1.
	2.	ANF-524(P)(A) and Supplements 1 and 2, Advanced Nuclear Fuels Corporation Critical Power Methodology for Boiling Water Reactors, (as specified in Technical Specification 5.6.5).
	3.	ANF-1125(P)(A) and Supplements 1 and 2, ANFB Critical Power Correlation, Advanced Nuclear Fuels Corporation, (as specified in Technical Specification 5.6.5).
	4.	ANF-1125(P)(A), Supplement 1, Appendix E, ANFB Critical Power Correlation Determination of ATRIUM-9B Additive Constant Uncertainties, Siemens Power Corporation, (as specified in Technical Specification 5.6.5).
	5.	10 CFR 100.

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## B 2.0 SAFETY LIMITS (SLs)

B 2.1.2 Reactor Coolant System (RCS) Pressure SL

BASES

BACKGROUND	The SL on reactor steam dome pressure protects the RCS against overpressurization. In the event of fuel cladding failure, fission products are released into the reactor coolant. The RCS then serves as the primary barrier in preventing the release of fission products into the atmosphere. Establishing an upper limit on reactor steam dome pressure ensures continued RCS integrity. According to UFSAR Sections 3.1.2.2.5, and 3.1.2.2.6 (Ref. 1), the reactor coolant pressure boundary (RCPB) shall be designed with sufficient margin to ensure that the design conditions are not exceeded during normal operation and anticipated operational occurrences (AOOS).
	During normal operation and AOOs, RCS pressure is limited from exceeding the design pressure by more than 10%, in accordance with Section III of the ASME Code (Ref. 2). To ensure system integrity, all RCS components are hydrostatically tested at 125% of design pressure, in accordance with ASME Code requirements, prior to initial operation when there is no fuel in the core. Following inception of unit operation, RCS components shall be pressure tested in accordance with the requirements of ASME Code, Section XI (Ref. 3).
	Overpressurization of the RCS could result in a breach of the RCPB, reducing the number of protective barriers designed to prevent radioactive releases from exceeding the limits specified in 10 CFR 100, "Reactor Site Criteria" (Ref. 4). If this occurred in conjunction with a fuel cladding failure, fission products could enter the containment atmosphere.

BASES (continued)

The RCS safety/relief valves and the Reactor Protection APPLICABLE System Reactor Vessel Steam Dome Pressure - High Function SAFETY ANALYSES have settings established to ensure that the RCS pressure SL will not be exceeded. The RCS pressure SL has been selected such that it is at a pressure below which it can be shown that the integrity of the system is not endangered. The reactor pressure vessel is designed to Section III of the ASME. Boiler and Pressure Vessel Code. 1963 Edition, including Addenda through the summer of 1964 and Code Case Interpretations applicable on February 8, 1965 (Ref. 5). which permits a maximum pressure transient of 110%, 1345 psig, of design pressure 1250 psig. The SL of 1345 psig. as measured in the reactor steam dome, is equivalent to 1375 psig at the lowest elevation of the RCS. The RCS is designed to the USAS Power Piping Code, Section B31.1, 1967 Edition (Ref. 6), and ASME, Boiler and Pressure Vessel Code, Section I, 1965 Edition, including Addenda winter 1966 (Ref. 7) for the reactor recirculation piping, which permits a maximum pressure transient of 120% of a design pressure of 1175 psig for suction piping and 1325 psig for discharge piping. The RCS pressure SL is selected to be the lowest transient overpressure allowed by the applicable codes.

SAFETY LIMITS The maximum transient pressure allowable in the RCS pressure vessel under the ASME Code, Section III, is 110% of design pressure. The maximum transient pressure allowable in the RCS piping, valves, and fittings is 120% of the design pressure of 1175 psig for suction piping. The most limiting of these allowances is the 110% of the RCS pressure vessel design pressure; therefore, the SL on maximum allowable RCS pressure is established at 1345 psig as measured at the reactor steam dome.

APPLICABILITY SL 2.1.2 applies in all MODES.

SAFETY LIMIT 2.2 VIOLATIONS Exceeding the RCS pressure SL may cause RCS failure and create a potential for radioactive releases in excess of 10 CFR 100, "Reactor Site Criteria," limits (Ref. 4).

(continued)

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SAFETY LIMIT VIOLATIONS	<pre>2.2 (continued)</pre>	
	Therefore, it is required to insert all insertable control rods and restore compliance with the SL within 2 hours. The 2 hour Completion Time ensures that the operators take prompt remedial action and also assures that the probability of an accident occurring during this period is minimal.	
REFERENCES	. UFSAR Sections 3.1	.2.2.5, and 3.1.2.2.6.
	2. ASME, Boiler and P Article NB-7000.	ressure Vessel Code, Section III,
	8. ASME, Boiler and P Article IWB-5000.	ressure Vessel Code, Section XI,
	4. 10 CFR 100.	
	1963 Edition, Adde	ressure Vessel Code, Section III, nda summer of 1964 and Code Case plicable on February 8, 1965.
	5. ASME, USAS, Power Edition.	Piping Code, Section B31.1, 1967
	'. ASME, Boiler and P Edition, Addenda w	ressure Vessel Code, Section I, 1965 inter 1966.

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## B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

BASES

LCOs	LCO 3.0.1 through LCO 3.0.7 establish the general requirements applicable to all Specifications in Sections 3.1 through 3.10 and apply at all times, unless otherwise stated.
LCO 3.0.1	LCO 3.0.1 establishes the Applicability statement within each individual Specification as the requirement for when the LCO is required to be met (i.e., when the unit is in the MODES or other specified conditions of the Applicability statement of each Specification).
LCO 3.0.2	LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, the associated ACTIONS shall be met. The Completion Time of each Required Action for an ACTIONS Condition is applicable from the point in time that an ACTIONS Condition is entered. The Required Actions establish those remedial measures that must be taken within specified Completion Times when the requirements of an LCO are not met. This Specification establishes that:
	a. Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification; and
	b. Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified.
	There are two basic types of Required Actions. The first type of Required Action specifies a time limit in which the LCO must be met. This time limit is the Completion Time to restore an inoperable system or component to OPERABLE status or to restore variables to within specified limits. If this type of Required Action is not completed within the specified Completion Time, a shutdown may be required to place the unit in a MODE or condition in which the Specification is not applicable. (Whether stated as a Required Action or not, correction of the entered Condition is an action that may always be considered upon entering ACTIONS.) The second type of Required Action specifies the remedial measures that permit continued operation of the

unit that is not further restricted by the Completion Time. LCO 3.0.2 In this case, compliance with the Required Actions provides (continued) an acceptable level of safety for continued operation. Completing the Required Actions is not required when an LCO is met or is no longer applicable, unless otherwise stated in the individual Specifications. The nature of some Required Actions of some Conditions necessitates that. once the Condition is entered, the Required Actions must be completed even though the associated Condition no longer exists. The individual LCO's ACTIONS specify the Required Actions where this is the case. An example of this is in LCO 3.4.9, "RCS Pressure and Temperature (P/T) Limits." The Completion Times of the Required Actions are also applicable when a system or component is removed from service intentionally. The reasons for intentionally relying on the ACTIONS include, but are not limited to, performance of Surveillances, preventive maintenance, corrective maintenance, or investigation of operational problems. Entering ACTIONS for these reasons must be done in a manner that does not compromise safety. Intentional entry into ACTIONS should not be made for operational convenience. Additionally, if intentional entry into ACTIONS would result in redundant equipment being inoperable, alternatives should be used instead. Doing so limits the time both subsystems/divisions of a safety function are inoperable and limits the time conditions exist which may result in LCO 3.0.3 being entered. Individual Specifications may specify a time limit for performing an SR when equipment is removed from service or bypassed for testing. In this case, the Completion Times of the Required Actions are applicable when this time limit expires, if the equipment remains removed from service or bypassed. When a change in MODE or other specified condition is required to comply with Required Actions, the unit may enter a MODE or other specified condition in which another

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

#### BASES (continued)

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

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

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

Upon entering LCO 3.0.3, 1 hour is allowed to prepare for an orderly shutdown before initiating a change in unit operation. This includes time to permit the operator to coordinate the reduction in electrical generation with the load dispatcher to ensure the stability and availability of the electrical grid. The time limits specified to reach lower MODES of operation permit the shutdown to proceed in a controlled and orderly manner that is well within the specified maximum cooldown rate and within the capabilities of the unit, assuming that only the minimum required equipment is OPERABLE. This reduces thermal stresses on components of the Reactor Coolant System and the potential for a plant upset that could challenge safety systems under conditions to which this Specification applies. The use and interpretation of specified times to complete the actions of LCO 3.0.3 are consistent with the discussion of Section 1.3, Completion Times.

- LCO 3.0.3 A unit shutdown required in accordance with LCO 3.0.3 may be (continued) terminated and LCO 3.0.3 exited if any of the following occurs:
  - a. The LCO is now met.
  - b. A Condition exists for which the Required Actions have now been performed.
  - c. ACTIONS exist that do not have expired Completion Times. These Completion Times are applicable from the point in time that the Condition is initially entered and not from the time LCO 3.0.3 is exited.

The time limits of Specification 3.0.3 allow 37 hours for the unit to be in MODE 4 when a shutdown is required during MODE 1 operation. If the unit is in a lower MODE of operation when a shutdown is required, the time limit for reaching the next lower MODE applies. If a lower MODE is reached in less time than allowed, however, the total allowable time to reach MODE 4, or other applicable MODE, is not reduced. For example, if MODE 3 is reached in 10 hours, then the time allowed for reaching MODE 4 is the next 27 hours, because the total time for reaching MODE 4 is not reduced from the allowable limit of 37 hours. Therefore, if remedial measures are completed that would permit a return to MODE 1, a penalty is not incurred by having to reach a lower MODE of operation in less than the total time allowed.

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

Exceptions to LCO 3.0.3 are provided in instances where requiring a unit shutdown, in accordance with LCO 3.0.3, would not provide appropriate remedial measures for the associated condition of the unit. An example of this is in LCO 3.7.8, "Spent Fuel Storage Pool Water Level." LCO 3.7.8 has an Applicability of "During movement of irradiated fuel

- LCO 3.0.3 (continued) assemblies in the spent fuel storage pool." Therefore, this LCO can be applicable in any or all MODES. If the LCO and the Required Actions of LCO 3.7.8 are not met while in MODE 1, 2, or 3, there is no safety benefit to be gained by placing the unit in a shutdown condition. The Required Action of LCO 3.7.8 of "Suspend movement of fuel assemblies in the spent fuel storage pool" is the appropriate Required Action to complete in lieu of the actions of LCO 3.0.3. These exceptions are addressed in the individual Specifications.
- LCO 3.0.4 LCO 3.0.4 establishes limitations on changes in MODES or other specified conditions in the Applicability when an LCO is not met. It precludes placing the unit in a MODE or other specified condition stated in that Applicability (e.g., Applicability desired to be entered) when the following exist:
  - a. Unit conditions are such that the requirements of the LCO would not be met in the Applicability desired to be entered; and
  - b. Continued noncompliance with the LCO requirements, if the Applicability were entered, would result in the unit being required to exit the Applicability desired to be entered to comply with the Required Actions.

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

The provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability

that are required to comply with ACTIONS. In addition, the 100 3.0.4 provisions of LCO 3.0.4 shall not prevent changes in MODES (continued) or other specified conditions in the Applicability that result from any unit shutdown. Exceptions to LCO 3.0.4 are stated in the individual Specifications. The exceptions allow entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered do not provide for continued operation for an unlimited period of time. Exceptions may apply to all the ACTIONS or to a specific Required Action of a Specification. Surveillances do not have to be performed on the associated inoperable equipment (or on variables outside the specified limits), as permitted by SR 3.0.1. Therefore, changing MODES or other specified conditions while in an ACTIONS Condition, either in compliance with LCO 3.0.4 or where an exception to LCO 3.0.4 is stated, is not a violation of SR 3.0.1 or SR 3.0.4 for those Surveillances that do not have to be performed due to the associated inoperable equipment. However, SRs must be met to ensure OPERABILITY prior to declaring the associated equipment OPERABLE (or variable within limits) and restoring compliance with the affected LCO. LCO 3.0.4 is only applicable when entering MODE 3 from MODE 4. MODE 2 from MODE 3 or 4, or MODE 1 from MODE 2. Furthermore, LCO 3.0.4 is applicable when entering any other specified condition in the Applicability only while operating in MODE 1, 2, or 3. The requirements of LCO 3.0.4 do not apply in MODES 4 and 5, or in other specified conditions of the Applicability (unless in MODE 1, 2, or 3) because the ACTIONS of individual specifications sufficiently define the remedial measures to be taken.

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

LCO 3.0.5 (continued)

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

b. The OPERABILITY of other equipment.

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

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

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

LCO 3.0.6 LCO 3.0.6 establishes an exception to LCO 3.0.2 for support systems that have an LCO specified in the Technical Specifications (TS). This exception is provided because LCO 3.0.2 would require that the Conditions and Required Actions of the associated inoperable supported system's LCO be entered solely due to the inoperability of the support system. This exception is justified because the actions that are required to ensure the plant is maintained in a safe condition are specified in the support system LCO's Required Actions. These Required Actions may include entering the supported system's Conditions and Required Actions or may specify other Required Actions.

When a support system is inoperable and there is an LCO specified for it in the TS, the supported system(s) are required to be declared inoperable if determined to be

LCO 3.0.6 (continued) inoperable as a result of the support system inoperability. However, it is not necessary to enter into the supported systems' Conditions and Required Actions unless directed to do so by the support system's Required Actions. The potential confusion and inconsistency of requirements related to the entry into multiple support and supported systems' LCO's Conditions and Required Actions are eliminated by providing all the actions that are necessary to ensure the plant is maintained in a safe condition in the support system's Required Actions.

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

Specification 5.5.11, "Safety Function Determination Program (SFDP)," ensures loss of safety function is detected and appropriate actions are taken. Upon entry into LCO 3.0.6, an evaluation shall be made to determine if loss of safety function exists. Additionally, other limitations, remedial actions, or compensatory actions may be identified as a result of the support system inoperability and corresponding exception to entering supported system Conditions and Required Actions. The SFDP implements the requirements of LCO 3.0.6.

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

LCO 3.0.6 (continued) This loss of safety function does not require the assumption of additional single failures or loss of offsite power. Since operation is being restricted in accordance with the ACTIONS of the support system, any resulting temporary loss of redundancy or single failure protection is taken into account. Similarly, the ACTIONS for inoperable offsite circuit(s) and inoperable diesel generator(s) provide the necessary restriction for cross division inoperabilities. This explicit cross division verification for inoperable AC electrical power sources also acknowledges that supported system(s) are not declared inoperable solely as a result of inoperability of a normal or emergency electrical power source (refer to the definition of OPERABLE - OPERABILITY).

> When a loss of safety function is determined to exist, and the SFDP requires entry into the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists, consideration must be given to the specific type of function affected. Where a loss of function is solely due to a single Technical Specification support system (e.g., loss of automatic start due to inoperable instrumentation, or loss of pump suction source due to low tank level) the appropriate LCO is the LCO for the support system. The ACTIONS for a support system LCO adequately addresses the inoperabilities of that system without reliance on entering its supported system LCO. When the loss of function is the result of multiple support systems, the appropriate LCO is the LCO for the support

There are certain special tests and operations required to LCO 3.0.7 be performed at various times over the life of the unit. These special tests and operations are necessary to demonstrate select unit performance characteristics, to perform special maintenance activities, and to perform special evolutions. Special Operations LCOs in Section 3.10 allow specified TS requirements to be changed to permit performances of these special tests and operations, which otherwise could not be performed if required to comply with the requirements of these TS. Unless otherwise specified, all the other TS requirements remain unchanged. This will ensure all appropriate requirements of the MODE or other specified condition not directly associated with or required to be changed to perform the special test or operation will remain in effect.

BASES

- The Applicability of a Special Operations LCO represents a LCO 3.0.7 condition not necessarily in compliance with the normal (continued) requirements of the TS. Compliance with Special Operations LCOs is optional. A special operation may be performed either under the provisions of the appropriate Special Operations LCO or under the other applicable TS requirements. If it is desired to perform the special operation under the provisions of the Special Operations LCO, the requirements of the Special Operations LCO shall be followed. When a Special Operations LCO requires another LCO to be met, only the requirements of the LCO statement are required to be met regardless of that LCO's Applicability (i.e., should the requirements of this other LCO not be met, the ACTIONS of the Special Operations LCO apply, not the ACTIONS of the other LCO). However, there are instances where the Special Operations LCO's ACTIONS may direct the other LCOs' ACTIONS be met. The Surveillances of the other LCO are not required to be met, unless specified in the Special Operations LCO. If conditions exist such that the Applicability of any other LCO is met, all the other LCO's requirements (ACTIONS and SRs) are required to be met concurrent with the requirements of the Special Operations LCO.
- LCO 3.0.8 LCO 3.0.8 establishes the applicability of each Specification to both Unit 2 and Unit 3 operation. Whenever a requirement applies to only one unit, or is different for each unit, this will be identified in the appropriate section of the Specification (e.g., Applicability, Surveillance, etc.) with parenthetical reference, Notes, or other appropriate presentation within the body of the requirement.

# B 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

BASES	SES
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SRs	SR 3.0.1 through SR 3.0.4 establish the general requirements applicable to all Specifications in Sections 3.1 through 3.10 and apply at all times, unless otherwise stated.
SR 3.0.1	SR 3.0.1 establishes the requirement that SRs must be met during the MODES or other specified conditions in the Applicability for which the requirements of the LCO apply, unless otherwise specified in the individual SRs. This Specification is to ensure that Surveillances are performed to verify the OPERABILITY of systems and components, and that variables are within specified limits. Failure to meet a Surveillance within the specified Frequency, in accordance with SR 3.0.2, constitutes a failure to meet an LCO.
	Systems and components are assumed to be OPERABLE when the associated SRs have been met. Nothing in this Specification, however, is to be construed as implying that systems or components are OPERABLE when:
	a. The systems or components are known to be inoperable, although still meeting the SRs; or
	b. The requirements of the Surveillance(s) are known to be not met between required Surveillance performances.
	Surveillances do not have to be performed when the unit is in a MODE or other specified condition for which the requirements of the associated LCO are not applicable, unless otherwise specified. The SRs associated with a Special Operations LCO are only applicable when the Special Operations LCO is used as an allowable exception to the requirements of a Specification.
	Unplanned events may satisfy the requirements (including applicable acceptance criteria) for a given SR. In this case, the unplanned event may be credited as fulfilling the performance of the SR.
	Surveillances, including Surveillances invoked by Required Actions, do not have to be performed on inoperable equipment
	(continued)

SR 3.0.1 because the ACTIONS define the remedial measures that apply. (continued) Surveillances have to be met and performed in accordance with SR 3.0.2, prior to returning equipment to OPERABLE status.

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

Some examples of this process are:

- a. Control Rod Drive maintenance during refueling that requires scram testing at ≥ 800 psig. However, if other appropriate testing is satisfactorily completed and the scram time testing of SR 3.1.4.3 is satisfied, the control rod can be considered OPERABLE. This allows startup to proceed to reach 800 psig to perform other necessary testing.
- b. High pressure coolant injection (HPCI) maintenance during shutdown that requires system functional tests at a specified pressure. Provided other appropriate testing is satisfactorily completed, startup can proceed with HPCI considered OPERABLE. This allows operation to reach the specified pressure to complete the necessary post maintenance testing.
- SR 3.0.2 SR 3.0.2 establishes the requirements for meeting the specified Frequency for Surveillances and any Required Action with a Completion Time that requires the periodic performance of the Required Action on a "once per..." interval.

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

The 25% extension does not significantly degrade the reliability that results from performing the Surveillance at its specified Frequency. This is based on the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the SRs. The exceptions to SR 3.0.2 are those Surveillances for which the 25% extension of the interval specified in the Frequency does not apply. These exceptions are stated in the individual Specifications. The requirements of regulations take precedence over the TS. Therefore, when a test interval is specified in the regulations, the test interval cannot be extended by the TS, and the SR includes a Note in the Frequency stating "SR 3.0.2 is not applicable."

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

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

#### BASES (continued)

SR 3.0.3 SR 3.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified Frequency, whichever is less, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met. This delay period provides adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with Required Actions or other remedial measures that might preclude completion of the Surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements.

When a Surveillance with a Frequéncy based not on time intervals, but upon specified unit conditions or operational situations, is discovered not to have been performed when specified, SR 3.0.3 allows the full delay period of 24 hours to perform the Surveillance.

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

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

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the Required Actions for the applicable

SR 3.0.3 (continued)	LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon the failure of the Surveillance. Completion of the Surveillance within the delay period allowed by this Specification, or within the Completion Time of the ACTIONS, restores compliance with SR 3.0.1.
SR 3.0.4	SR 3.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified condition in the Applicability.
	This Specification ensures that system and component OPERABILITY requirements and variable limits are met before entry into MODES or other specified conditions in the Applicability for which these systems and components ensure safe operation of the unit.
	The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.
	However, in certain circumstances, failing to meet an SR will not result in SR 3.0.4 restricting a MODE change or other specified condition change. When a system, subsystem, division, component, device, or variable is inoperable or outside its specified limits, the associated SR(s) are not required to be performed per SR 3.0.1, which states that Surveillances do not have to be performed on inoperable equipment. When equipment is inoperable, SR 3.0.4 does not apply to the associated SR(s) since the requirement for the SR(s) to be performed is removed. Therefore, failing to perform the Surveillance(s) within the specified Frequency,

SR(s) to be performed is removed. Therefore, failing to perform the Surveillance(s) within the specified Frequency, on equipment that is inoperable, does not result in an SR 3.0.4 restriction to changing MODES or other specified conditions of the Applicability. However, since the LCO is not met in this instance, LCO 3.0.4 will govern any restrictions that may (or may not) apply to MODE or other specified condition changes.

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

The precise requirements for performance of SRs are specified such that exceptions to SR 3.0.4 are not necessary. The specific time frames and conditions necessary for meeting the SRs are specified in the Frequency, in the Surveillance, or both. This allows performance of Surveillances when the prerequisite condition(s) specified in a Surveillance procedure require entry into the MODE or other specified condition in the Applicability of the associated LCO prior to the performance or completion of a Surveillance. A Surveillance that could not be performed until after entering the LCO Applicability would have its Frequency specified such that it is not "due" until the specific conditions needed are met. Alternately, the Surveillance may be stated in the form of a Note as not required (to be met or performed) until a particular event, condition, or time has been reached. Further discussion of the specific formats of SRs' annotation is found in Section 1.4, Frequency.

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

SR 3.0.5 SR 3.0.5 establishes the applicability of each Surveillance to both Unit 2 and Unit 3 operation. Whenever a requirement applies to only one unit, or is different for each unit, this will be identified with parenthetical reference, Notes, or other appropriate presentation within the SR.

#### B 3.1 REACTIVITY CONTROL SYSTEMS

### B 3.1.1 SHUTDOWN MARGIN (SDM)

BASES

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These requirements are satisfied by the control rods, as described in UFSAR, Section 3.1.2.3.7 (Ref. 1), which can compensate for the reactivity effects of the fuel and water temperature changes experienced during all operating conditions.		

Having sufficient APPLICABLE and remain subcritical after all design basis accidents and SAFETY ANALYSES transients. For example, SDM is assumed as an initial condition for the control rod removal error during refueling (Ref. 2) accident. The analysis of this reactivity insertion event assumes the refueling interlocks are OPERABLE when the reactor is in the refueling mode of operation. These interlocks prevent the withdrawal of more than one control rod from the core during refueling. (Special consideration and requirements for multiple control rod withdrawal during refueling are covered in Special Operations LCO 3.10.5, "Multiple Control Rod Withdrawal-Refueling.") The analysis assumes this condition is acceptable since the core will be shut down with the highest worth control rod withdrawn, if adequate SDM has been demonstrated.

> Prevention or mitigation of positive reactivity insertion events is necessary to limit the energy deposition in the fuel, thereby preventing significant fuel damage, which

APPLICABLE	could result in undue release of radioactivity. Adequate
SAFETY ANALYSES	SDM ensures inadvertent criticalities do not cause
(continued)	significant fuel damage.
	SDM satisfies Criterion 2 of 10 CFR 50.36(c)(2)(ii).

- LCO The specified SDM limit accounts for the uncertainty in the demonstration of SDM by testing. Separate SDM limits are provided for testing where the highest worth control rod is determined analytically or by measurement. This is due to the reduced uncertainty in the SDM test when the highest worth control rod is determined by measurement. When SDM is demonstrated by calculations not associated with a test (e.g., to confirm SDM during the fuel loading sequence), additional margin is included to account for uncertainties in the calculation. To ensure adequate SDM, a design margin is included to account for uncertainties in the design calculations (Ref. 3).
- APPLICABILITY In MODES 1 and 2, SDM must be provided to assure shutdown capability. In MODES 3 and 4, SDM is required to ensure the reactor will be held subcritical with margin for a single withdrawn control rod. SDM is required in MODE 5 to prevent an open vessel, inadvertent criticality during the withdrawal of a single control rod from a core cell containing one or more fuel assemblies (Ref. 2).

ACTIONS <u>A.1</u>

With SDM not within the limits of the LCO in MODE 1 or 2, SDM must be restored within 6 hours. Failure to meet the specified SDM may be caused by a control rod that cannot be inserted. The allowed Completion Time of 6 hours is acceptable, considering that the reactor can still be shut down, assuming no failures of additional control rods to insert, and the low probability of an event occurring during this interval.

ACTIONS	<u>B.1</u>					
(continued)	If the SDM cannot be restored,	the	plant	must	be	bro

If the SDM cannot be restored, the plant must be brought to MODE 3 in 12 hours, to prevent the potential for further reductions in available SDM (e.g., additional stuck control rods). The allowed Completion Time of 12 hours is reasonable, based on operating experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging plant systems.

### <u>C.1</u>

With SDM not within limits in MODE 3, the operator must immediately initiate action to fully insert all insertable control rods. Action must continue until all insertable control rods are fully inserted. This action results in the least reactive condition for the core.

## D.1, D.2, D.3, and D.4

With SDM not within limits in MODE 4, the operator must immediately initiate action to fully insert all insertable control rods. Action must continue until all insertable control rods are fully inserted. This action results in the least reactive condition for the core. Action must also be initiated within 1 hour to provide means for control of potential radioactive releases. This includes ensuring secondary containment is OPERABLE; at least one Standby Gas Treatment (SGT) subsystem is OPERABLE; and secondary containment isolation capability is available in each associated secondary containment penetration flow path not isolated that is assumed to be isolated to mitigate radioactivity releases (i.e., at least one secondary containment isolation valve and associated instrumentation are OPERABLE. or other acceptable administrative controls to assure isolation capability). These administrative controls consist of stationing a dedicated operator, who is in continuous communication with the control room, at the controls of the isolation device. In this way, the penetration can be rapidly isolated when a need for secondary containment isolation is indicated. This (ensuring components are OPERABLE) may be performed as an

ACTIONS

### D.1, <u>D.2, D.3, and D.4</u> (continued)

administrative check, by examining logs or other information, to determine if the components are out of service for maintenance or other reasons. It is not necessary to perform the surveillances needed to demonstrate the OPERABILITY of the components. If, however, any required component is inoperable, then it must be restored to OPERABLE status. In this case, SRs may need to be performed to restore the component to OPERABLE status. Actions must continue until all required components are OPERABLE.

## E.1, E.2, E.3, E.4, and E.5

With SDM not within limits in MODE 5, the operator must immediately suspend CORE ALTERATIONS that could reduce SDM (e.g., insertion of fuel in the core or the withdrawal of control rods). Suspension of these activities shall not preclude completion of movement of a component to a safe condition. Inserting control rods or removing fuel from the core will reduce the total reactivity and are therefore excluded from the suspended actions.

Action must also be immediately initiated to fully insert all insertable control rods in core cells containing one or more fuel assemblies. Action must continue until all insertable control rods in core cells containing one or more fuel assemblies have been fully inserted. Control rods in core cells containing no fuel assemblies do not affect the reactivity of the core and therefore do not have to be inserted.

Action must also be initiated within 1 hour to provide means for control of potential radioactive releases. This includes ensuring secondary containment is OPERABLE; at least one SGT subsystem is OPERABLE; and secondary containment isolation capability is available in each associated secondary containment penetration flow path not isolated that is assumed to be isolated to mitigate radioactivity releases (i.e., at least one secondary containment isolation valve and associated instrumentation are OPERABLE, or other acceptable administrative controls to

ACTIONS

## E.1, E.2, E.3, E.4, and E.5 (continued)

assure isolation capability). These administrative controls consist of stationing a dedicated operator, who is in continuous communication with the control room, at the controls of the isolation device. In this way, the penetration can be rapidly isolated when a need for secondary containment isolation is indicated. This (ensuring components are OPERABLE) may be performed as an administrative check, by examining logs or other information, to determine if the components are out of service for maintenance or other reasons. It is not necessary to perform the Surveillances as needed to demonstrate the OPERABILITY of the components. If, however, any required component is inoperable, then it must be restored to OPERABLE status. In this case, SRs may need to be performed to restore the component to OPERABLE status. Action must continue until all required components are OPERABLE.

#### SURVEILLANCE REQUIREMENTS

### <u>SR 3.1.1.1</u>

Adequate SDM must be verified to ensure that the reactor can be made subcritical from any initial operating condition. This can be accomplished by a test, an evaluation, or a combination of the two. Adequate SDM is demonstrated by testing before or during the first startup after fuel movement. shuffling within the reactor pressure vessel, or control rod replacement. Control rod replacement refers to the decoupling and removal of a control rod from a core location, and subsequent replacement with a new control rod or a control rod from another core location. Since core reactivity will vary during the cycle as a function of fuel depletion and poison burnup, the beginning of cycle (BOC) test must also account for changes in core reactivity during the cycle. Therefore, to obtain the SDM, the initial measured value must be increased by an adder, "R", which is the difference between the calculated value of maximum core reactivity during the operating cycle and the calculated BOC core reactivity. If the value of R is negative (that is, BOC is the most reactive point in the cycle), no correction to the BOC measured value is required (Ref. 4). For the SDM

SURVEILLANCE REQUIREMENTS

#### SR 3.1.1.1 (continued)

demonstrations that rely solely on calculation of the highest worth control rod, additional margin (0.10%  $\Delta k/k$ ) must be added to the SDM limit of 0.28%  $\Delta k/k$  to account for uncertainties in the calculation.

The SDM may be demonstrated during an in-sequence control rod withdrawal, in which the highest worth control rod is analytically determined, or during local criticals, where the highest worth control rod is determined by testing.

Local critical tests require the withdrawal of out of sequence control rods. This testing would therefore require bypassing of the rod worth minimizer to allow the out of sequence withdrawal, and therefore additional requirements must be met (see LCO 3.10.6, "Control Rod Testing-Operating").

The Frequency of 4 hours after reaching criticality is allowed to provide a reasonable amount of time to perform the required calculations and have appropriate verification.

During MODES 3 and 4, analytical calculation of SDM may be used to assure the requirements of SR 3.1.1 are met. During MODE 5. adequate SDM is required to ensure that the reactor does not reach criticality during control rod withdrawals. An evaluation of each in-vessel fuel movement during fuel loading (including shuffling fuel within the core) is required to ensure adequate SDM is maintained during refueling. This evaluation ensures that the intermediate loading patterns are bounded by the safety analyses for the final core loading pattern. For example, bounding analyses that demonstrate adequate SDM for the most reactive configurations during the refueling may be performed to demonstrate acceptability of the entire fuel movement sequence. These bounding analyses include additional margins to the associated uncertainties. Spiral offload/reload sequences inherently satisfy the SR, provided the fuel assemblies are reloaded in the same configuration analyzed for the new cycle. Removing fuel from the core will always result in an increase in SDM.

BASES (continued)

REFERENCES	1.	UFSAR, Sections 3.1.2.3.7.
	2.	UFSAR, Section 15.4.1.
	3.	UFSAR, Section 4.3.2.1.3.

#### B 3.1 REACTIVITY CONTROL SYSTEMS

#### B 3.1.2 Reactivity Anomalies

BASES

In accordance with UFSAR, Sections 3.1.2.3.7, 3.1.2.3.9, and BACKGROUND 3.1.2.3.10 (Ref. 1), reactivity shall be controllable such that subcriticality is maintained under cold conditions and acceptable fuel design limits are not exceeded during normal operation and anticipated operational occurrences. Therefore. Reactivity Anomalies is used as a measure of the predicted versus measured core reactivity during power operation. The continual confirmation of core reactivity is necessary to ensure that the Design Basis Accident (DBA) and transient safety analyses remain valid. A large reactivity anomaly could be the result of unanticipated changes in fuel reactivity or control rod worth or operation at conditions not consistent with those assumed in the predictions of core reactivity, and could potentially result in a loss of SDM or violation of acceptable fuel design limits. Comparing predicted versus measured core reactivity validates the nuclear methods used in the safety analysis and supports the SDM demonstrations (LCO 3.1.1, "SHUTDOWN MARGIN (SDM)") in assuring the reactor can be brought safely to cold, subcritical conditions.

> When the reactor core is critical or in normal power operation, a reactivity balance exists and the net reactivity is zero. A comparison of predicted and measured reactivity is convenient under such a balance, since parameters are being maintained relatively stable under steady state power conditions. The positive reactivity inherent in the core design is balanced by the negative reactivity of the control components, thermal feedback, neutron leakage, and materials in the core that absorb neutrons, such as burnable absorbers, producing zero net reactivity.

In order to achieve the required fuel cycle energy output, the uranium enrichment in the new fuel loading and the fuel loaded in the previous cycles provide excess positive reactivity beyond that required to sustain steady state operation at the beginning of cycle (BOC). When the reactor is critical at RTP and operating moderator temperature, the excess positive reactivity is compensated by burnable

(continued)

Dresden 2 and 3

BACKGROUND (continued) absorbers (e.g., gadolinia), control rods, and whatever neutron poisons (mainly xenon and samarium) are present in the fuel. The predicted core reactivity, as represented by k effective (k<sub>eff</sub>) is calculated by a 3D core simulator code as a function of cycle exposure. This calculation is performed for projected operating states and conditions throughout the cycle. The core reactivity is determined from k<sub>eff</sub> for actual plant conditions and is then compared to the predicted value for the cycle exposure.

APPLICABLE Accurate prediction of core reactivity is either an explicit SAFETY ANALYSES Or implicit assumption in the accident analysis evaluations (Ref. 2). In particular, SDM and reactivity transients, such as control rod withdrawal accidents or rod drop accidents, are very sensitive to accurate prediction of core reactivity. These accident analysis evaluations rely on computer codes that have been qualified against available test data, operating plant data, and analytical benchmarks. Monitoring reactivity anomaly provides additional assurance that the nuclear methods provide an accurate representation of the core reactivity.

The comparison between measured and predicted initial core reactivity provides a normalization for the calculational models used to predict core reactivity. If the measured and predicted core  $K_{eff}$  for identical core conditions at BOC do not reasonably agree, then the assumptions used in the reload cycle design analysis or the calculation models used to predict core  $k_{eff}$  may not be accurate. If reasonable agreement between measured and predicted core reactivity exists at BOC, then the prediction may be normalized to the measured value. Thereafter, any significant deviations in the measured core  $k_{eff}$  from the predicted core  $k_{eff}$  that develop during fuel depletion may be an indication that the assumptions of the DBA and transient analyses are no longer valid, or that an unexpected change in core conditions has occurred.

Reactivity Anomalies satisfies Criterion 2 of 10 CFR 50.36(c)(2)(ii).

## BASES (continued)

LCO The reactivity anomaly limit is established to ensure plant operation is maintained within the assumptions of the safety analyses. Large differences between monitored and predicted core reactivity may indicate that the assumptions of the DBA and transient analyses are no longer valid, or that the uncertainties in the "Nuclear Design Methodology" are larger than expected. A limit on the difference between the monitored and the predicted core  $k_{eff}$  of  $\pm 1\% \ \Delta k/k$  has been established based on engineering judgment. A > 1% deviation in reactivity from that predicted is larger than expected.

In MODE 1, most of the control rods are withdrawn and steady APPLICABILITY state operation is typically achieved. Under these conditions, the comparison between predicted and monitored core reactivity provides an effective measure of the reactivity anomaly. In MODE 2, control rods are typically being withdrawn during a startup. In MODES 3 and 4, all control rods are fully inserted and therefore the reactor is in the least reactive state, where monitoring core reactivity is not necessary. In MODE 5, fuel loading results in a continually changing core reactivity. SDM requirements (LCO 3.1.1) ensure that fuel movements are performed within the bounds of the safety analysis, and an SDM demonstration is required during the first startup following operations that could have altered core reactivity (e.g., fuel movement, control rod replacement, shuffling). The SDM test, required by LCO 3.1.1, provides a direct comparison of the predicted and monitored core reactivity at cold conditions; therefore, Reactivity Anomalies is not required during these conditions.

#### ACTIONS <u>A.1</u>

Should an anomaly develop between measured and predicted core reactivity, the core reactivity difference must be restored to within the limit to ensure continued operation is within the core design assumptions. Restoration to within the limit could be performed by an evaluation of the core design and safety analysis to determine the reason for the anomaly. This evaluation normally reviews the core conditions to determine their consistency with input to design calculations. Measured core and process parameters

### ACTIONS <u>A.1</u> (continued)

are also normally evaluated to determine that they are within the bounds of the safety analysis, and safety analysis calculational models may be reviewed to verify that they are adequate for representation of the core conditions. The required Completion Time of 72 hours is based on the low probability of a DBA occurring during this period, and allows sufficient time to assess the physical condition of the reactor and complete the evaluation of the core design and safety analysis.

### <u>B.1</u>

If the core reactivity cannot be restored to within the 1%  $\Delta k/k$  limit, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours. The allowed Completion Time of 12 hours is reasonable, based on operating experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging plant systems.

#### SURVEILLANCE <u>SR 3.1.2.1</u> REQUIREMENTS

Verifying the reactivity difference between the monitored and predicted core  $k_{eff}$  is within the limits of the LCO provides added assurance that plant operation is maintained within the assumptions of the DBA and transient analyses. The Core Monitoring System calculates the core  $k_{\rm eff}$  for the reactor conditions obtained from plant instrumentation. A comparison of the monitored core  $k_{eff}$  to the predicted core k<sub>eff</sub> at the same cycle exposure is used to calculate the reactivity difference. The comparison is required when the core reactivity has potentially changed by a significant amount. This may occur following a refueling in which new fuel assemblies are loaded, fuel assemblies are shuffled within the core, or control rods are replaced or shuffled. Control rod replacement refers to the decoupling and removal of a control rod from a core location, and subsequent replacement with a new control rod or a control rod from another core location. Also, core reactivity changes during the cycle. The 24 hour interval after reaching equilibrium

REOUTREMENTS

## SURVEILLANCE <u>SR 3.1.2.1</u> (continued)

conditions following a startup is based on the need for equilibrium xenon concentrations in the core, such that an accurate comparison between the monitored and predicted core  $k_{eff}$  can be made. For the purposes of this SR, the reactor is assumed to be at equilibrium conditions when steady state operations (no control rod movement or core flow changes) at  $\geq$  75% RTP have been obtained. The 1000 MWD/T Frequency was developed, considering the relatively slow change in core reactivity with exposure and operating experience related to variations in core reactivity. This comparison requires the core to be operating at power levels which minimize the uncertainties and measurement errors, in order to obtain meaningful results. Therefore, the comparison is only done when in MODE 1. The core weight, tons(T) in MWD/T, reflects metric tons.

REFERENCES 1. UFSAR, Sections 3.1.2.3.7, 3.1.2.3.9, and 3.1.2.3.10.

2. UFSAR, Chapter 15.

### B 3.1 REACTIVITY CONTROL SYSTEMS

### B 3.1.3 Control Rod OPERABILITY

BASES

BACKGROUND Control rods are components of the control rod drive (CRD) System, which is the primary reactivity control system for the reactor. In conjunction with the Reactor Protection System, the CRD System provides the means for the reliable control of reactivity changes to ensure under conditions of normal operation, including anticipated operational occurrences, that specified acceptable fuel design limits are not exceeded. In addition, the control rods provide the capability to hold the reactor core subcritical under all conditions and to limit the potential amount and rate of reactivity increase caused by a malfunction in the CRD System. The CRD System is designed to satisfy the requirements of UFSAR, Sections 3.1.2.3.7, 3.1.2.3.8, 3.1.2.3.9, and 3.1.2.3.10 (Ref. 1).

> The CRD System consists of 177 locking piston control rod drive mechanisms (CRDMs) and a hydraulic control unit for each drive mechanism. The locking piston type CRDM is a double acting hydraulic piston, which uses condensate water as the operating fluid. Accumulators provide additional energy for scram. An index tube and piston, coupled to the control rod, are locked at fixed increments by a collet mechanism. The collet fingers engage notches in the index tube to prevent unintentional withdrawal of the control rod, but without restricting insertion.

> This Specification, along with LCO 3.1.4, "Control Rod Scram Times," LCO 3.1.5, "Control Rod Scram Accumulators," and LCO 3.1.6, "Rod Pattern Control," ensure that the performance of the control rods in the event of a Design Basis Accident (DBA) or transient meets the assumptions used in the safety analyses of References 2, 3, and 4.

APPLICABLE	The analytical methods and assumptions used in the
SAFETY ANALYSES	evaluations involving control rods are presented in
	Reference 5. The control rods provide the primary means for
	rapid reactivity control (reactor scram), for maintaining

	the reactor subcritical and for limiting the potential
APPLICABLE SAFETY ANALYSES (continued)	effects of reactivity insertion events caused by malfunctions in the CRD System.
	The capability to insert the control rods provides assurance that the assumptions for scram reactivity in the DBA and transient analyses are not violated. Since the SDM ensures the reactor will be subcritical with the highest worth control rod withdrawn (assumed single failure), the additional failure of a second control rod to insert, if required, could invalidate the demonstrated SDM and potentially limit the ability of the CRD System to hold the reactor subcritical. If the control rod is stuck at an inserted position and becomes decoupled from the CRD, a control rod drop accident (CRDA) can possibly occur. Therefore, the requirement that all control rods be OPERABLE ensures the CRD System can perform its intended function.
·	The control rods also protect the fuel from damage which could result in release of radioactivity. The limits protected are the MCPR Safety Limit (SL) (see Bases for SL 2.1.1, "Reactor Core SLs," and LCO 3.2.2, "MINIMUM CRITICAL POWER RATIO (MCPR)"), the 1% cladding plastic strain fuel design limit (see Bases for LCO 3.2.4, "Average Power Range Monitor (APRM) Gain and Setpoint"), and the fuel design limit (see Bases for LCO 3.1.6, "Rod Pattern Control") during reactivity insertion events.
	The negative reactivity insertion (scram) provided by the CRD System provides the analytical basis for determination of plant thermal limits and provides protection against fuel design limits during a CRDA. The Bases for LCO 3.1.4, LCO 3.1.5, and LCO 3.1.6 discuss in more detail how the SLs are protected by the CRD System.
	Control rod OPERABILITY satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii).
LCO	The OPERABILITY of an individual control rod is based on a combination of factors, primarily, the scram insertion times, the control rod coupling integrity, and the ability
	(continued)

LCO to determine the control rod position. Accumulator (continued) OPERABILITY is addressed by LCO 3.1.5. The associated scram accumulator status for a control rod only affects the scram insertion times; therefore, an inoperable accumulator does not immediately require declaring a control rod inoperable. Although not all control rods are required to be OPERABLE to satisfy the intended reactivity control requirements, strict control over the number and distribution of inoperable control rods is required to satisfy the assumptions of the DBA and transient analyses.

OPERABILITY requirements for control rods also include correct assembly of the CRD housing supports.

- APPLICABILITY In MODES 1 and 2, the control rods are assumed to function during a DBA or transient and are therefore required to be OPERABLE in these MODES. In MODES 3 and 4, control rods are not able to be withdrawn since the reactor mode switch is in shutdown and a control rod block is applied. This provides adequate requirements for control rod OPERABILITY during these conditions. Control rod requirements in MODE 5 are located in LCO 3.9.5, "Control Rod OPERABILITY - Refueling."
- ACTIONS The ACTIONS Table is modified by a Note indicating that a separate Condition entry is allowed for each control rod. This is acceptable, since the Required Actions for each Condition provide appropriate compensatory actions for each inoperable control rod. Complying with the Required Actions may allow for continued operation, and subsequent inoperable control rods are governed by subsequent Condition entry and application of associated Required Actions.

### A.1, A.2, A.3, and A.4

A control rod is considered stuck if it will not insert by either CRD drive water or scram pressure. With a fully inserted control rod stuck, no actions are required as long as the control rod remains fully inserted. The Required Actions are modified by a Note, which allows the rod worth minimizer (RWM) to be bypassed if required to allow continued operation. LCO 3.3.2.1, "Control Rod Block Instrumentation," provides additional requirements when the

ACTIONS

#### A.1, <u>A.2, A.3, and A.4</u> (continued)

RWM is bypassed to ensure compliance with the CRDA analysis. With one withdrawn control rod stuck, the local scram reactivity rate assumptions may not be met if the stuck control rod separation criteria are not met. Therefore, a verification that the separation criteria are met must be performed immediately. The stuck control rod separation criteria are not met if: a) the stuck control rod occupies a location adjacent to two "slow" control rods, b) the stuck control rod occupies a location adjacent to one "slow" control rod, and the one "slow" control rod is also adjacent to another "slow" control rod, or c) if the stuck control rod occupies a location adjacent to one "slow" control rod when there is another pair of "slow" control rods elsewhere in the core adjacent to one another. The description of "slow" control rods is provided in LCO 3.1.4 "Control Rod Scram Times." In addition, the associated control rod drive must be disarmed in 2 hours. The allowed Completion Time of 2 hours is acceptable, considering the reactor can still be shut down, assuming no additional control rods fail to insert, and provides a reasonable time to perform the Required Action in an orderly manner. The control rod must be isolated from both scram and normal insert and withdraw pressure. Isolating the control rod from scram and normal insert and withdraw pressure prevents damage to the CRDM or reactor internals. The control rod isolation method should also ensure cooling water to the CRD is maintained.

Monitoring of the insertion capability of each withdrawn control rod must also be performed within 24 hours from discovery of Condition A concurrent with THERMAL POWER greater than the low power setpoint (LPSP) of the RWM. SR 3.1.3.2 and SR 3.1.3.3 perform periodic tests of the control rod insertion capability of withdrawn control rods. Testing each withdrawn control rod ensures that a generic problem does not exist. This Completion Time also allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." The Required Action A.3 Completion Time only begins upon discovery of Condition A concurrent with THERMAL POWER greater than the actual LPSP of the RWM since the notch insertions may not be compatible with the requirements of rod pattern control (LCO 3.1.6) and

## ACTIONS <u>A.1, A.2, A.3, and A.4</u> (continued)

the RWM (LCO 3.3.2.1). The allowed Completion Time provides a reasonable time to test the control rods, considering the potential for a need to reduce power to perform the tests.

To allow continued operation with a withdrawn control rod stuck, an evaluation of adequate SDM is also required within 72 hours. Should a DBA or transient require a shutdown, to preserve the single failure criterion, an additional control rod would have to be assumed to fail to insert when required. Therefore, the original SDM demonstration may not be valid. The SDM must therefore be evaluated (by measurement or analysis) with the stuck control rod at its stuck position and the highest worth OPERABLE control rod assumed to be fully withdrawn.

The allowed Completion Time of 72 hours to verify SDM is adequate, considering that with a single control rod stuck in a withdrawn position, the remaining OPERABLE control rods are capable of providing the required scram and shutdown reactivity. Failure to reach MODE 4 is only likely if an additional control rod adjacent to the stuck control rod also fails to insert during a required scram. Even with the postulated additional single failure of an adjacent control rod to insert, sufficient reactivity control remains to reach MODE 3 conditions.

#### <u>B.1</u>

With two or more withdrawn control rods stuck, the plant must be brought to MODE 3 within 12 hours. The occurrence of more than one control rod stuck at a withdrawn position increases the probability that the reactor cannot be shut down if required. Insertion of all insertable control rods eliminates the possibility of an additional failure of a control rod to insert. The allowed Completion Time of 12 hours is reasonable, based on operating experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging plant systems.

ACTIONS

(continued)

C.1 and C.2

With one or more control rods inoperable for reasons other than being stuck in the withdrawn position, operation may continue, provided the control rods are fully inserted within 3 hours and disarmed (electrically or hydraulically) within 4 hours. Inserting a control rod ensures the shutdown and scram capabilities are not adversely affected. The control rod is disarmed to prevent inadvertent withdrawal during subsequent operations. The control rods can be hydraulically disarmed by closing the drive water and exhaust water isolation valves. The control rods can be electrically disarmed by disconnecting power from all four directional control valve solenoids. Required Action C.1 is modified by a Note, which allows the RWM to be bypassed if required to allow insertion of the inoperable control rods and continued operation. LCO 3.3.2.1 provides additional requirements when the RWM is bypassed to ensure compliance with the CRDA analysis.

The allowed Completion Times are reasonable, considering the small number of allowed inoperable control rods, and provide time to insert and disarm the control rods in an orderly manner and without challenging plant systems.

### D.1 and D.2

Out of sequence control rods may increase the potential reactivity worth of a dropped control rod during a CRDA. At < 10% RTP, the analyzed rod position sequence analysis (Refs. 6 and 7) requires inserted control rods not in compliance with the analyzed rod position sequence to be separated by at least two OPERABLE control rods in all directions, including the diagonal (i.e., all other control rods in a five-by-five array centered on the inoperable control rod are OPERABLE). Therefore, if two or more inoperable control rods are not in compliance with the analyzed rod position sequence and not separated by at least two OPERABLE control rods in all directions, action must be taken to restore compliance with the analyzed rod position sequence or restore the control rods to OPERABLE status. Condition D is modified by a Note indicating that the Condition is not applicable when > 10% RTP, since the analyzed rod position sequence is not required to be

#### ACTIONS <u>D.1 and D.2</u> (continued)

followed under these conditions, as described in the Bases for LCO 3.1.6. The allowed Completion Time of 4 hours is acceptable, considering the low probability of a CRDA occurring.

## <u>E.1</u>

If any Required Action and associated Completion Time of Condition A, C, or D are not met, or there are nine or more inoperable control rods, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to MODE 3 within 12 hours. This ensures all insertable control rods are inserted and places the reactor in a condition that does not require the active function (i.e., scram) of the control rods. The number of control rods permitted to be inoperable when operating above 10% RTP (e.g., no CRDA considerations) could be more than the value specified, but the occurrence of a large number of inoperable control rods could be indicative of a generic problem, and investigation and resolution of the potential problem should be undertaken. The allowed Completion Time of 12 hours is reasonable, based on operating experience, to reach MODE 3 from full power in an orderly manner and without challenging plant systems.

#### SURVEILLANCE <u>SR 3.1.3.1</u> REQUIREMENTS

The position of each control rod must be determined to ensure adequate information on control rod position is available to the operator for determining control rod OPERABILITY and controlling rod patterns. Control rod position may be determined by the use of OPERABLE position indicators, by moving control rods to a position with an OPERABLE indicator (full-in, full-out, or numeric indicators), by verifying the indicators one notch "out" and one notch "in" are OPERABLE, or by the use of other appropriate methods. The 24 hour Frequency of this SR is based on operating experience related to expected changes in control rod position and the availability of control rod position indications in the control room.

SURVEILLANCE

#### SR 3.1.3.2 and <u>SR 3.1.3.3</u>

REQUIREMENTS Control rod insertion capability is demonstrated by (continued) inserting each partially or fully withdrawn control rod at least one notch and observing that the control rod moves. The control rod may then be returned to its original position. This ensures the control rod is not stuck and is free to insert on a scram signal. These Surveillances are not required when THERMAL POWER is less than or equal to the actual LPSP of the RWM, since the notch insertions may not be compatible with the requirements of the analyzed rod position sequence (LCO 3.1.6) and the RWM (LCO 3.3.2.1). The 7 day Frequency of SR 3.1.3.2 is based on operating experience related to the changes in CRD performance and the ease of performing notch testing for fully withdrawn control Partially withdrawn control rods are tested at a rods. 31 day Frequency, based on the potential power reduction required to allow the control rod movement and considering the large testing sample of SR 3.1.3.2. Furthermore, the 31 day Frequency takes into account operating experience related to changes in CRD performance. At any time, if a control rod is immovable, a determination of that control rod's trippability (OPERABILITY) must be made and appropriate action taken.

> These SRs are modified by Notes that allow 7 days and 31 days respectively, after withdrawal of the control rod and increasing power to above the LPSP, to perform the Surveillance. This acknowledges that the control rod must be first withdrawn and THERMAL POWER must be increased to above the LPSP before performance of the Surveillance, and therefore, the Notes avoid potential conflicts with SR 3.0.3 and SR 3.0.4.

### <u>SR 3.1.3.4</u>

Verifying that the scram time for each control rod to 90% insertion is  $\leq$  7 seconds provides reasonable assurance that the control rod will insert when required during a DBA or transient, thereby completing its shutdown function. This SR is performed in conjunction with the control rod scram time testing of SR 3.1.4.1, SR 3.1.4.2, SR 3.1.4.3, and

(continued)

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SURVEILLANCE REQUIREMENTS

### SR 3.1.3.4 (continued)

SR 3.1.4.4. The LOGIC SYSTEM FUNCTIONAL TEST in LCO 3.3.1.1, "Reactor Protection System (RPS) Instrumentation," and the functional testing of SDV vent and drain valves in LCO 3.1.8, "Scram Discharge Volume (SDV) Vent and Drain Valves," overlap this Surveillance to provide complete testing of the assumed safety function. The associated Frequencies are acceptable, considering the more frequent testing performed to demonstrate other aspects of control rod OPERABILITY and operating experience, which shows scram times do not significantly change over an operating cycle.

### SR 3.1.3.5

Coupling verification is performed to ensure the control rod is connected to the CRDM and will perform its intended function when necessary. The Surveillance requires verifying that a control rod does not go to the withdrawn overtravel position when it is fully withdrawn. The overtravel position feature provides a positive check on the coupling integrity since only an uncoupled CRD can reach the overtravel position. The verification is required to be performed any time a control rod is withdrawn to the "full out" position (notch position 48) or prior to declaring the control rod OPERABLE after work on the control rod or CRD System that could affect coupling. This includes control rods inserted one notch and then returned to the "full out" position during the performance of SR 3.1.3.2. This Frequency is acceptable, considering the low probability that a control rod will become uncoupled when it is not being moved and operating experience related to uncoupling events.

REFERENCES	1.	UFSAR, Sections 3.1.2.3.7, 3.1.2.3.8, 3.1.2.3.9, and 3.1.2.3.10.
	~	USCID Continue ( 2 0 1 4

- 2. UFSAR, Section 4.3.2.1.4.
- 3. UFSAR, Section 5.2.2.
- 4. UFSAR, Chapter 15.

REFERENCES (continued)	5.	UFSAR, Section 4.6.3.4.2.1.
(continued)	6.	NEDO-21231, "Banked Position Withdrawal Sequence," Section 7.2, January 1977.
	7.	NFSR-0091, Commonwealth Edison Topical Report, Benchmark of CASMO/MICROBURN BWR Nuclear Design Methods, (as specified in Technical Specification 5.6.5).

### B 3.1 REACTIVITY CONTROL SYSTEMS

#### B 3.1.4 Control Rod Scram Times

### BASES

BACKGROUND The scram function of the Control Rod Drive (CRD) System controls reactivity changes during anticipated operational occurrences to ensure that specified acceptable fuel design limits are not exceeded (Ref. 1). The control rods are scrammed by positive means using hydraulic pressure exerted on the CRD piston.

> When a scram signal is initiated, control air is vented from the scram valves, allowing them to open by spring action. Opening the exhaust valve reduces the pressure above the main drive piston to atmospheric pressure, and opening the inlet valve applies the accumulator or reactor pressure to the bottom of the piston. Since the notches in the index tube are tapered on the lower edge, the collet fingers are forced open by cam action, allowing the index tube to move upward without restriction because of the high differential pressure across the piston. As the drive moves upward and the accumulator pressure reduces below the reactor pressure, a ball check valve opens, letting the reactor pressure complete the scram action. If the reactor pressure is low, such as during startup, the accumulator will fully insert the control rod in the required time without assistance from reactor pressure.

APPLICABLE SAFETY ANALYSES The analytical methods and assumptions used in evaluating the control rod scram function are presented in Reference 2. The Design Basis Accident (DBA) and transient analyses assume that all of the control rods scram at a specified insertion rate. The resulting negative scram reactivity forms the basis for the determination of plant thermal limits (e.g., the MCPR). Other distributions of scram times (e.g., several control rods scramming slower than the average time with several control rods scramming faster than the average time) can also provide sufficient scram reactivity. Surveillance of each individual control rod's scram time ensures the scram reactivity assumed in the DBA and transient analyses can be met.

LCO

The scram function of the CRD System protects the MCPR APPLICABLE Safety Limit (SL) (see Bases for SL 2.1.1, "Reactor Core SAFFTY ANALYSES SLS." and LCO 3.2.2, "MINIMUM CRITICAL POWER RATIO (MCPR)") (continued) and the 1% cladding plastic strain fuel design limit (see Bases for LCO 3.2.4, Average Power Range Monitor (APRM) Gain and Setpoint"), which ensure that no fuel damage will occur if these limits are not exceeded. At > 800 psig, the scram function is designed to insert negative reactivity at a rate fast enough to prevent the actual MCPR from becoming less than the MCPR SL, during the analyzed limiting power transient. Below 800 psig, the scram function is assumed to perform during the control rod drop accident (Ref. 3) and. therefore, also provides protection against violating fuel design limits during reactivity insertion accidents (see Bases for LCO 3.1.6. "Rod Pattern Control"). For the reactor vessel overpressure protection analysis, the scram function, along with the safety/relief valves, ensure that the peak vessel pressure is maintained within the applicable ASME Code limits.

Control rod scram times satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

The scram times specified in Table 3.1.4-1 are required to ensure that the scram reactivity assumed in the DBA and transient analysis is met (Ref. 4). To account for single failures and "slow" scramming control rods, the scram times specified in Table 3.1.4-1 are faster than those assumed in the design basis analysis. The scram times have a margin that allows up to approximately 7% of the control rods (e.g., 177 x 7%  $\approx$  12) to have scram times exceeding the specified limits (i.e., "slow" control rods) assuming a single stuck control rod (as allowed by LCO 3.1.3, "Control Rod OPERABILITY") and an additional control rod failing to scram per the single failure criterion. The scram times are specified as a function of reactor steam dome pressure to account for the pressure dependence of the scram times. The scram times are specified relative to measurements based on reed switch positions, which provide the control rod position indication. The reed switch closes ("pickup") when the index tube passes a specific location and then opens

LCO (continued)	("dropout") as the index tube travels upward. Verification of the specified scram times in Table 3.1.4-1 is accomplished through measurement and interpolation of the "pickup" or "dropout" times of reed switches associated with each of the required insertion positions. To ensure that local scram reactivity rates are maintained within acceptable limits, no more than two of the allowed "slow" control rods may occupy adjacent locations (face or diagonal).
	Table 3.1.4-1 is modified by two Notes which state that control rods with scram times not within the limits of the table are considered "slow" and that control rods with scram times > 7 seconds are considered inoperable as required by SR 3.1.3.4.
	This LCO applies only to OPERABLE control rods since inoperable control rods will be inserted and disarmed (LCO 3.1.3). Slow scramming control rods may be conservatively declared inoperable and not accounted for as "slow" control rods.
APPLICABILITY	In MODES 1 and 2, a scram is assumed to function during transients and accidents analyzed for these plant conditions. These events are assumed to occur during startup and power operation; therefore, the scram function of the control rods is required during these MODES. In MODES 3 and 4, the control rods are not able to be withdrawn since the reactor mode switch is in shutdown and a control rod block is applied. This provides adequate requirements for control rod scram capability during these conditions. Scram requirements in MODE 5 are contained in LCO 3.9.5, "Control Rod OPERABILITY - Refueling."

ACTIONS

<u>A.1</u>

BASES

When the requirements of this LCO are not met, the rate of negative reactivity insertion during a scram may not be within the assumptions of the safety analyses. Therefore, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to MODE 3 within 12 hours. The allowed Completion Time of 12 hours is reasonable, based on operating

(continued)

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#### ACTION A.1 (continued)

experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE REQUIREMENTS The four SRs of this LCO are modified by a Note stating that during a single control rod scram time surveillance, the CRD pumps shall be isolated from the associated scram accumulator. With the CRD pump isolated, (i.e., charging valve closed) the influence of the CRD pump head does not affect the single control rod scram times. During a full core scram, the CRD pump head would be seen by all control rods and would have a negligible effect on the scram insertion times.

### <u>SR 3.1.4.1</u>

The scram reactivity used in DBA and transient analyses is based on an assumed control rod scram time. Measurement of the scram times with reactor steam dome pressure  $\geq$  800 psig demonstrates acceptable scram times for the transients analyzed in References 5, 6, and 7.

Maximum scram insertion times occur at a reactor steam dome pressure of approximately 800 psig because of the competing effects of reactor steam dome pressure and stored accumulator energy. Therefore, demonstration of adequate scram times at reactor steam dome pressure > 800 psig ensures that the measured scram times will be within the specified limits at higher pressures. Limits are specified as a function of reactor pressure to account for the sensitivity of the scram insertion times with pressure and to allow a range of pressures over which scram time testing can be performed. To ensure that scram time testing is performed within a reasonable time following a shutdown  $\geq$  120 days or longer, control rods are required to be tested before exceeding 40% RTP following the shutdown. This Frequency is acceptable considering the additional Surveillances performed for control rod OPERABILITY, the frequent verification of adequate accumulator pressure, and the required testing of control rods affected by fuel movement within the associated core cell and by work on control rods or the CRD System.

SURVEILLANCE

REQUIREMENTS

(continued)

#### SR 3.1.4.2

Additional testing of a sample of control rods is required to verify the continued performance of the scram function during the cycle. A representative sample contains at least 10% of the control rods. The sample remains representative if no more than 20% of the control rods in the sample tested are determined to be "slow." With more than 20% of the sample declared to be "slow" per the criteria in Table 3.1.4-1. additional control rods are tested until this 20% criterion (i.e., 20% of the entire sample size) is satisfied, or until the total number of "slow" control rods (throughout the core, from all surveillances) exceeds the LCO limit. For planned testing, the control rods selected for the sample should be different for each test. Data from inadvertent scrams should be used whenever possible to avoid unnecessary testing at power, even if the control rods with data may have been previously tested in a sample. The 120 day Frequency is based on operating experience that has shown control rod scram times do not significantly change over an operating cycle. This Frequency is also reasonable based on the additional Surveillances done on the CRDs at more frequent intervals in accordance with LCO 3.1.3 and LCO 3.1.5. "Control Rod Scram Accumulators."

#### <u>SR 3.1.4.3</u>

When work that could affect the scram insertion time is performed on a control rod or the CRD System. testing must be done to demonstrate that each affected control rod retains adequate scram performance over the range of applicable reactor pressures from zero to the maximum permissible pressure. The scram testing must be performed once before declaring the control rod OPERABLE. The required scram time testing must demonstrate the affected control rod is still within acceptable limits. The scram time limits for reactor pressures < 800 psig are found in the Technical Requirements Manual (Ref. 8) and are established based on a high probability of meeting the acceptance criteria at reactor pressures  $\geq$  800 psig. Limits for  $\geq$  800 psig are found in Table 3.1.4-1. If testing demonstrates the affected control rod does not meet these limits, but is within the 7-second limit of Table 3.1.4-1. Note 2, the control rod can be declared OPERABLE and "slow."

(continued)

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REOUIREMENTS

#### SURVEILLANCE <u>SR 3.1.4.3</u> (continued)

Specific examples of work that could affect the scram times are (but are not limited to) the following: removal of any CRD for maintenance or modification; replacement of a control rod; and maintenance or modification of a scram solenoid pilot valve, scram valve, accumulator, isolation valve or check valve in the piping required for scram.

The Frequency of once prior to declaring the affected control rod OPERABLE is acceptable because of the capability to test the control rod over a range of operating conditions and the more frequent surveillances on other aspects of control rod OPERABILITY.

#### <u>SR 3.1.4.4</u>

When work that could affect the scram insertion time is performed on a control rod or CRD System, or when fuel movement within the reactor pressure vessel occurs, testing must be done to demonstrate each affected control rod is still within the limits of Table 3.1.4-1 with the reactor steam dome pressure  $\geq$  800 psig. Where work has been performed at high reactor pressure, the requirements of SR 3.1.4.3 and SR 3.1.4.4 can be satisfied with one test. For a control rod affected by work performed while shut down, however, a zero pressure and high pressure test may be required. This testing ensures that, prior to withdrawing the control rod for continued operation, the control rod scram performance is acceptable for operating reactor pressure conditions. Alternatively, a control rod scram test during hydrostatic pressure testing could also satisfy both criteria. When fuel movement within the reactor pressure yessel occurs, only those control rods associated with the core cells affected by the fuel movement are required to be scram time tested. During a routine refueling outage. it is expected that all control rods will be affected.

The Frequency of once prior to exceeding 40% RTP is acceptable because of the capability to test the control rod over a range of operating conditions and the more frequent surveillances on other aspects of control rod OPERABILITY.

(continued)

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REFERENCES	1.	UFSAR, Section 3.1.2.2.1.
	2.	UFSAR, Section 4.6.3.4.2.1.
	3.	UFSAR, Section 15.4.10.
	4.	Letter from R.F. Janecek (BWROG) to R.W. Starostecki (NRC), "BWR Owners Group Revised Reactivity Control System Technical Specifications," BWROG-8754, September 17, 1987.
	5.	UFSAR, Section 5.2.2.2.3.
	6.	UFSAR, Section 6.2.1.3.2.
	7.	UFSAR, Chapter 15.
	8.	Technical Requirements Manual.

Control Rod Scram Accumulators B 3.1.5

# B 3.1 REACTIVITY CONTROL SYSTEMS

B 3.1.5 Control Rod Scram Accumulators

## BASES

BACKGROUND	The control rod scram accumulators are part of the Control Rod Drive (CRD) System and are provided to ensure that the control rods scram under varying reactor conditions. The control rod scram accumulators store sufficient energy to fully insert a control rod at any reactor vessel pressure. The accumulator is a hydraulic cylinder with a free floating piston. The piston separates the water used to scram the control rods from the nitrogen, which provides the required energy. The scram accumulators are necessary to scram the control rods within the required insertion times of LCO 3.1.4, "Control Rod Scram Times."
APPLICABLE SAFETY ANALYSES	The analytical methods and assumptions used in evaluating the control rod scram function are presented in Reference 1. The Design Basis Accident (DBA) and transient analyses assume that all of the control rods scram at a specified insertion rate. OPERABILITY of each individual control rod scram accumulator, along with LCO 3.1.3, "Control Rod OPERABILITY," and LCO 3.1.4, ensures that the scram reactivity assumed in the DBA and transient analyses can be met. The existence of an inoperable accumulator may invalidate prior scram time measurements for the associated control rod.
	The scram function of the CRD System, and therefore the OPERABILITY of the accumulators, protects the MCPR Safety Limit (see Bases for SL 2.1.1, "Reactor Core SLs," and LCO 3.2.2, "MINIMUM CRITICAL POWER RATIO (MCPR)") and 1% cladding plastic strain fuel design limit (see Bases for LCO 3.2.4, "Average Power Range Monitor (APRM) Gain and Setpoint"), which ensure that no fuel damage will occur if these limits are not exceeded (see Bases for LCO 3.1.4). In addition, the scram function at low reactor vessel pressure (i.e., startup conditions) provides protection against violating fuel design limits during reactivity insertion accidents (see Bases for LCO 3.1.6, "Rod Pattern Control").
	(continued)

APPLICABLE SAFETY ANALYSES (continued)	Control rod scram accumulators satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).
LCO	The OPERABILITY of the control rod scram accumulators is required to ensure that adequate scram insertion capability exists when needed over the entire range of reactor pressures. The OPERABILITY of the scram accumulators is based on maintaining adequate accumulator pressure.

- APPLICABILITY In MODES 1 and 2, the scram function is required for mitigation of DBAs and transients, and therefore the scram accumulators must be OPERABLE to support the scram function. In MODES 3 and 4, control rods are not able to be withdrawn since the reactor mode switch is in shutdown and a control rod block is applied. This provides adequate requirements for control rod scram accumulator OPERABILITY during these conditions. Requirements for scram accumulators in MODE 5 are contained in LCO 3.9.5, "Control Rod OPERABILITY – Refueling."
- ACTIONS The ACTIONS Table is modified by a Note indicating that a separate Condition entry is allowed for each control rod scram accumulator. This is acceptable since the Required Actions for each Condition provide appropriate compensatory actions for each inoperable accumulator. Complying with the Required Actions may allow for continued operation and subsequent inoperable accumulators governed by subsequent Condition entry and application of associated Required Actions.

## A.1 and A.2

With one control rod scram accumulator inoperable and the reactor steam dome pressure  $\geq$  900 psig, the control rod may be declared "slow," since the control rod will still scram at the reactor operating pressure but may not satisfy the required scram times in Table 3.1.4-1. Required Action A.1 is modified by a Note indicating that declaring the control rod "slow" only applies if the associated control rod scram time was within the limits of Table 3.1.4-1 during the last

(continued)

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#### ACTIONS <u>A.1 and A.2</u> (continued)

scram time Surveillance. Otherwise, the control rod may already be considered "slow" and the further degradation of scram performance with an inoperable accumulator could result in excessive scram times. In this event, the associated control rod is declared inoperable (Required Action A.2) and LCO 3.1.3 is entered. This would result in requiring the affected control rod to be fully inserted and disarmed, thereby satisfying its intended function, in accordance with ACTIONS of LCO 3.1.3.

The allowed Completion Time of 8 hours is reasonable, based on the large number of control rods available to provide the scram function and the ability of the affected control rod to scram only with reactor pressure at high reactor pressures.

#### B.1, B.2.1, and B.2.2

With two or more control rod scram accumulators inoperable and reactor steam dome pressure  $\geq 900$  psig, adequate pressure must be supplied to the charging water header. With inadequate charging water pressure, all of the accumulators could become inoperable, resulting in a potentially severe degradation of the scram performance. Therefore, within 20 minutes from discovery of charging water header pressure < 940 psig concurrent with Condition B, adequate charging water header pressure must be restored. The allowed Completion Time of 20 minutes is reasonable, to place a CRD pump into service to restore the charging header pressure, if required. This Completion Time is based on the ability of the reactor pressure alone to fully insert all control rods.

The control rod may be declared "slow," since the control rod will still scram using only reactor pressure, but may not satisfy the times in Table 3.1.4-1. Required Action B.2.1 is modified by a Note indicating that declaring the control rod "slow" only applies if the associated control rod scram time is within the limits of Table 3.1.4-1 during the last scram time Surveillance. Otherwise, the control rod may already be considered "slow" and the further

(continued)

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ACTIONS

#### <u>B.1, B.2.1, and B.2.2</u> (continued)

degradation of scram performance with an inoperable accumulator could result in excessive scram times. In this event, the associated control rod is declared inoperable (Required Action B.2.2) and LCO 3.1.3 entered. This would result in requiring the affected control rod to be fully inserted and disarmed, thereby satisfying its intended function in accordance with ACTIONS of LCO 3.1.3.

The allowed Completion Time of 1 hour is reasonable, based on the ability of only the reactor pressure to scram the control rods and the low probability of a DBA or transient occurring while the affected accumulators are inoperable.

### <u>C.1 and C.2</u>

With one or more control rod scram accumulators inoperable and the reactor steam dome pressure < 900 psig. the pressure supplied to the charging water header must be adequate to ensure that accumulators remain charged. With the reactor steam dome pressure < 900 psig, the function of the accumulators in providing the scram force becomes much more important since the scram function could become severely degraded during a depressurization event or at low reactor pressures. Therefore, immediately upon discovery of charging water header pressure < 940 psig, concurrent with Condition C, all control rods associated with inoperable accumulators must be verified to be fully inserted. Withdrawn control rods with inoperable accumulators may fail to scram under these low pressure conditions. The associated control rods must also be declared inoperable within 1 hour. The allowed Completion Time of 1 hour is reasonable for Required Action C.2, considering the low probability of a DBA or transient occurring during the time that the accumulator is inoperable.

## <u>D.1</u>

The reactor mode switch must be immediately placed in the shutdown position if either Required Action and associated Completion Time associated with loss of the CRD pump (Required Actions B.1 and C.1) cannot be met. This ensures

BASES	
ACTIONS	<u>D.1</u> (continued)
	that all insertable control rods are inserted and that the reactor is in a condition that does not require the active function (i.e., scram) of the control rods. This Required Action is modified by a Note stating that the action is not applicable if all control rods associated with the inoperable scram accumulators are fully inserted, since the function of the control rods has been performed.
SURVEILLANCE	<u>SR 3.1.5.1</u>
REQUIREMENTS	SR 3.1.5.1 requires that the accumulator pressure be checked every 7 days to ensure adequate accumulator pressure exists to provide sufficient scram force. The primary indicator of accumulator OPERABILITY is the accumulator pressure. A minimum accumulator pressure is specified, below which the capability of the accumulator to perform its intended function becomes degraded and the accumulator is considered inoperable. The minimum accumulator pressure of 940 psig is well below the expected pressure of 1100 psig (Ref. 2). Declaring the accumulator inoperable when the minimum pressure is not maintained ensures that significant degradation in scram times does not occur. The 7 day Frequency has been shown to be acceptable through operating experience and takes into account indications available in the control room.
REFERENCES	1. UFSAR, Section 4.6.3.4.2.1.
	<ol> <li>Letter, from E.Y. Gibo (GE) to P. Chennel (ComEd), "Generic Basis for HCU Scram Accumulator Minimum Setpoint Pressure," April 10, 1998.</li> </ol>

#### B 3.1 REACTIVITY CONTROL SYSTEMS

#### B 3.1.6 Rod Pattern Control

BASES

BACKGROUND Control rod patterns during startup conditions are controlled by the operator and the rod worth minimizer (RWM) (LCO 3.3.2.1, "Control Rod Block Instrumentation"), so that only specified control rod sequences and relative positions are allowed over the operating range of all control rods inserted to 10% RTP. The sequences limit the potential amount of reactivity addition that could occur in the event of a Control Rod Drop Accident (CRDA).

This Specification assures that the control rod patterns are consistent with the assumptions of the CRDA analyses of References 1, 2, and 3.

APPLICABLE The analytical methods and assumptions used in evaluating SAFETY ANALYSES The CRDA are summarized in References 1, 2, 3, 4, and 5. CRDA analyses assume that the reactor operator follows prescribed withdrawal sequences. These sequences define the potential initial conditions for the CRDA analysis. The RWM (LCO 3.3.2.1) provides backup to operator control of the withdrawal sequences to ensure that the initial conditions of the CRDA analysis are not violated.

> Prevention or mitigation of positive reactivity insertion events is necessary to limit the energy deposition in the fuel, thereby preventing significant fuel damage which could result in the undue release of radioactivity. Since the failure consequences for UO<sub>2</sub> have been shown to be insignificant below fuel energy depositions of 300 cal/gm (Ref. 6), the fuel design limit of 280 cal/gm provides a margin of safety from significant core damage which would result in release of radioactivity (Ref. 7). Generic evaluations (Refs. 8 and 9) of a design basis CRDA (i.e., a CRDA resulting in a peak fuel energy deposition of 280 cal/gm) have shown that if the peak fuel enthalpy remains below 280 cal/gm, then the maximum reactor pressure will be less than the required ASME Code limits (Ref. 10)

APPLICABLE SAFETY ANALYSES (continued) and the calculated offsite doses will be well within the required limits (Ref. 11). Cycle specific CRDA analyses are performed that assume eight inoperable control rods with at least two cell separation and confirm fuel energy deposition is less than 280 cal/gm.

> Control rod patterns analyzed in the cycle specific analyses follow predetermined sequencing rules (analyzed rod position sequence). The analyzed rod position sequence is applicable from the condition of all control rods fully inserted to 10% RTP (Ref. 5). The control rods are required to be moved in groups, with all control rods assigned to a specific group required to be within specified banked positions (e.g., between notches 08 and 12). The banked positions are established to minimize the maximum incremental control rod worth without being overly restrictive during normal plant operation. Cycle specific analyses ensure that the 280 cal/gm fuel design limit will not be violated during a CRDA under worst case scenarios. The cycle specific analyses (Refs. 1, 2, 3, 4, and 5) also evaluate the effect of fully inserted, inoperable control rods not in compliance with the sequence, to allow a limited number (i.e., eight) and distribution of fully inserted, inoperable control rods. Specific analysis may also be performed for atypical operating conditions (e.g., fuel leaker suppression).

Rod pattern control satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii).

LCO Compliance with the prescribed control rod sequences minimizes the potential consequences of a CRDA by limiting the initial conditions to those consistent with the analyzed rod position sequence. This LCO only applies to OPERABLE control rods. For inoperable control rods required to be inserted, separate requirements are specified in LCO 3.1.3, "Control Rod OPERABILITY," consistent with the allowances for inoperable control rods in the analyzed rod position sequence.

APPLICABILITY In MODES 1 and 2, when THERMAL POWER is  $\leq 10\%$  RTP, the CRDA is a Design Basis Accident and, therefore, compliance with the assumptions of the safety analysis is required. When THERMAL POWER is > 10\% RTP, there is no credible control rod

(continued)

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APPLICABILITY (continued) configuration that results in a control rod worth that could exceed the 280 cal/gm fuel design limit during a CRDA (Refs. 4 and 5). In MODES 3 and 4, the reactor is shutdown and the control rods are not able to be withdrawn since the reactor mode switch is in shutdown and a control rod block is applied, therefore, a CRDA is not postulated to occur. In MODE 5, since the reactor is shut down and only a single control rod can be withdrawn from a core cell containing fuel assemblies, adequate SDM ensures that the consequences of a CRDA are acceptable, since the reactor will remain subcritical with a single control rod withdrawn.

#### ACTIONS <u>A.1 and A.2</u>

With one or more OPERABLE control rods not in compliance with the prescribed control rod sequence, actions may be taken to either correct the control rod pattern or declare the associated control rods inoperable within 8 hours. Noncompliance with the prescribed sequence may be the result of "double notching," drifting from a control rod drive cooling water transient, leaking scram valves, or a power reduction to  $\leq 10\%$  RTP before establishing the correct control rod pattern. The number of OPERABLE control rods not in compliance with the prescribed sequence is limited to eight, to prevent the operator from attempting to correct a control rod pattern that significantly deviates from the prescribed sequence.

Required Action A.1 is modified by a Note which allows the RWM to be bypassed to allow the affected control rods to be returned to their correct position. LCO 3.3.2.1 requires verification of control rod movement by a second licensed operator (Reactor Operator or Senior Reactor Operator) or by a task qualified member of the technical staff (e.g., a shift technical advisor or reactor engineer). This helps to ensure that the control rods will be moved to the correct position. A control rod not in compliance with the prescribed sequence is not considered inoperable except as required by Required Action A.2. The allowed Completion Time of 8 hours is reasonable, considering the restrictions on the number of allowed out of sequence control rods and the low probability of a CRDA occurring during the time the control rods are out of sequence.

ACTIONS

(continued)

## B.1 and B.2

If nine or more OPERABLE control rods are out of sequence, the control rod pattern significantly deviates from the prescribed sequence. Control rod withdrawal should be suspended immediately to prevent the potential for further deviation from the prescribed sequence. Control rod insertion to correct control rods withdrawn beyond their allowed position is allowed since, in general, insertion of control rods has less impact on control rod worth than withdrawals have. Required Action B.1 is modified by a Note which allows the RWM to be bypassed to allow the affected control rods to be returned to their correct position. LCO 3.3.2.1 requires verification of control rod movement by a second licensed operator (Reactor Operator or Senior Reactor Operator) or by a task qualified member of the technical staff (e.g., a shift technical advisor or reactor engineer).

When nine or more OPERABLE control rods are not in compliance with the analyzed rod position sequence, the reactor mode switch must be placed in the shutdown position within 1 hour. With the mode switch in shutdown, the reactor is shut down, and as such, does not meet the applicability requirements of this LCO. The allowed Completion Time of 1 hour is reasonable to allow insertion of control rods to restore compliance, and is appropriate relative to the low probability of a CRDA occurring with the control rods out of sequence.

SURVEILLANCE <u>SR 3.1.6.1</u>

REQUIREMENTS The control rod pattern is verified to be in compliance with the analyzed rod position sequence at a 24 hour Frequency to ensure the assumptions of the CRDA analyses are met. The 24 hour Frequency was developed considering that the primary check on compliance with the analyzed rod position sequence is performed by the RWM (LCO 3.3.2.1), which provides control rod blocks to enforce the required sequence and is required to be OPERABLE when operating at  $\leq$  10% RTP.

## BASES (continued)

REFERENCES	1.	UFSAR, Section 15.4.10.
	2.	XN-NF-80-19(P)(A), Volume 1, Supplement 2, Section 7.1 Exxon Nuclear Methodology for Boiling Water Reactors- Neutronics Methods for Design and Analysis, (as specified in Technical Specification 5.6.5).
	3.	NEDE-24011-P-A, "GE Standard Application for Reactor Fuel," (as specified in Technical Specification 5.6.5).
	4.	Letter from T.A. Pickens (BWROG) to G.C. Lainas (NRC), "Amendment 17 to General Electric Licensing Topical Report NEDE-24011-P-A," BWROG-8644, August 15, 1986.
	5.	NFSR-0091, Benchmark of CASMO/MICROBURN BWR Nuclear Design Methods, Commonwealth Edison Topical Report, (as specified in Technical Specification 5.6.5).
	6.	NUREG-0979, Section 4.2.1.3.2, April 1983.
	7.	NUREG-0800, Section 15.4.9, Revision 2, July 1981.
	8.	NEDO-21778-A, "Transient Pressure Rises Affected Fracture Toughness Requirements for Boiling Water Reactors," December 1978.
	9.	NEDO-10527, "Rod Drop Accident Analysis for Large BWRs," (including Supplements 1 and 2), March 1972.
	10.	ASME, Boiler and Pressure Vessel Code.
	11.	10 CFR 100.11.
	12.	NEDO-21231, "Banked Position Withdrawal Sequence," January 1977.

#### B 3.1 REACTIVITY CONTROL SYSTEMS

B 3.1.7 Standby Liquid Control (SLC) System

BASES

BACKGROUND The SLC System is designed to provide the capability of bringing the reactor, at any time in a fuel cycle, from full power and minimum control rod inventory (which is at the peak of the xenon transient) to a subcritical condition with the reactor in the most reactive, xenon free state without taking credit for control rod movement. The SLC System satisfies the requirements of 10 CFR 50.62 (Ref. 1) on anticipated transient without scram.

> The SLC System consists of a boron solution storage tank, two positive displacement pumps, two explosive valves that are provided in parallel for redundancy, and associated piping and valves used to transfer borated water from the storage tank to the reactor pressure vessel (RPV). The borated solution is discharged near the bottom of the core shroud, where it then mixes with the cooling water rising through the core. A smaller tank containing demineralized water is provided for testing purposes.

The SLC System is manually initiated from the main control APPLICABLE room, as directed by the emergency operating procedures. if SAFETY ANALYSES the operator determines the reactor cannot be shut down, or kept shut down, with the control rods. The SLC System is used in the event that enough control rods cannot be inserted to accomplish shutdown and cooldown in the normal manner. The SLC System injects borated water into the reactor core to add negative reactivity to compensate for all of the various reactivity effects that could occur during plant operations. To meet this objective, it is necessary to inject a quantity of boron, which produces a concentration of 600 ppm of natural boron, in the reactor coolant at 68°F. To allow for potential leakage and imperfect mixing in the reactor system, an amount of boron equal to 25% of the amount cited above is added (Ref. 2). The volume versus concentration limits in Figure 3.1.7-1 and the temperature versus concentration limits in Figure 3.1.7-2 are calculated such that the required concentration is achieved accounting for dilution in the RPV with reactor water level at the high alarm point, including the water volume in the shutdown cooling piping, the

APPLICABLE SAFETY ANALYSES (continued) recirculation loop piping, and portions of other piping systems which connect to the RPV below the high alarm point. This quantity of borated solution represented is the amount that is above the bottom of the boron solution storage tank. However, no credit is taken for the portion of the tank volume that cannot be injected.

The SLC System satisfies Criterion 4 of 10 CFR 50.36(c)(2)(ii).

LCO The OPERABILITY of the SLC System provides backup capability for reactivity control independent of normal reactivity control provisions provided by the control rods. The OPERABILITY of the SLC System is based on the conditions of the borated solution in the storage tank and the availability of a flow path to the RPV, including the OPERABILITY of the pumps and valves. Two SLC subsystems are required to be OPERABLE; each contains an OPERABLE pump, an explosive valve, and associated piping, valves, and instruments and controls to ensure an OPERABLE flow path. With one subsystem inoperable the requirements of 10 CFR 50.62 (Ref. 1) cannot be met, however, the remaining subsystem is still capable of shutting down the unit.

APPLICABILITY In MODES 1 and 2, shutdown capability is required. In MODES 3 and 4, control rods are not able to be withdrawn since the reactor mode switch is in shutdown and a control rod block is applied. This provides adequate controls to ensure that the reactor remains subcritical. In MODE 5, only a single control rod can be withdrawn from a core cell containing fuel assemblies. Demonstration of adequate SDM (LCO 3.1.1, "SHUTDOWN MARGIN (SDM)") ensures that the reactor will not become critical. Therefore, the SLC System is not required to be OPERABLE when only a single control rod can be withdrawn.

ACTIONS

A.1

If one SLC subsystem is inoperable, the inoperable subsystem must be restored to OPERABLE status within 7 days. In this condition, the remaining OPERABLE subsystem is adequate to

#### ACTIONS A.1 (continued)

shutdown the unit. However, the overall capability is reduced since the remaining OPERABLE subsystem cannot meet the requirements of Reference 1. The 7 day Completion Time is based on the availability of an OPERABLE subsystem capable of shutting down the reactor and the low probability of a Design Basis Accident (DBA) or severe transient occurring concurrent with the failure of the Control Rod Drive (CRD) System to shut down the reactor.

## <u>B.1</u>

If both SLC subsystems are inoperable, at least one subsystem must be restored to OPERABLE status within 8 hours. The allowed Completion Time of 8 hours is considered acceptable given the low probability of a DBA or transient occurring concurrent with the failure of the control rods to shut down the reactor.

## <u>C.1</u>

If any Required Action and associated Completion Time is not met, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to MODE 3 within 12 hours. The allowed Completion Time of 12 hours is reasonable, based on operating experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging plant systems.

## SURVEILLANCE <u>SR 3.1.7.1, SR 3.1.7.2, and SR 3.1.7.3</u>

SR 3.1.7.1 through SR 3.1.7.3 are 24 hour Surveillances verifying certain characteristics of the SLC System (e.g., the volume and temperature of the borated solution in the storage tank), thereby ensuring SLC System OPERABILITY without disturbing normal plant operation. These Surveillances ensure that the proper borated solution volume and temperature, including the temperature of the pump suction piping, are maintained. Maintaining a minimum specified borated solution temperature is important in ensuring that the boron remains in solution and does not

(continued)

REOUIREMENTS

SURVEILLANCE REQUIREMENTS SR 3.1.7.1, SR 3.1.7.2, and SR 3.1.7.3 (continued)

precipitate out in the storage tank or in the pump suction piping. The temperature versus concentration curve of Figure 3.1.7-2 ensures that a 10°F margin will be maintained above the saturation temperature. The 24 hour Frequency is based on operating experience and has shown there are relatively slow variations in the measured parameters of volume and temperature.

#### SR 3.1.7.4 and SR 3.1.7.6

SR 3.1.7.4 verifies the continuity of the explosive charges in the injection valves to ensure that proper operation will occur if required. Other administrative controls, such as those that limit the shelf life of the explosive charges, must be followed. The 31 day Frequency is based on operating experience and has demonstrated the reliability of the explosive charge continuity.

SR 3.1.7.6 verifies that each valve in the system is in its correct position, but does not apply to the squib (i.e., explosive) valves. Verifying the correct alignment for manual valves in the SLC System flow path provides assurance that the proper flow paths will exist for system operation. A valve is also allowed to be in the nonaccident position provided it can be aligned to the accident position from the control room, or locally by a dedicated operator at the valve control. This is acceptable since the SLC System is a manually initiated system. This Surveillance also does not apply to valves that are locked, sealed, or otherwise secured in position since they are verified to be in the correct position prior to locking, sealing, or securing. This verification of valve alignment does not require any testing or valve manipulation; rather, it involves verification that those valves capable of being mispositioned are in the correct position. This SR does not apply to valves that cannot be inadvertently misaligned, such as check valves. The 31 day Frequency is based on engineering judgment and is consistent with the procedural controls governing valve operation that ensures correct valve positions.

SURVEILLANCE

## SR 3.1.7.5

REQUIREMENTS (continued) This Surveillance requires an examination of the sodium pentaborate solution by using chemical analysis to ensure that the proper concentration of sodium pentaborate exists in the storage tank. SR 3.1.7.5 must be performed anytime boron or water is added to the storage tank solution to determine that the sodium pentaborate solution concentration is within the specified limits. SR 3.1.7.5 must also be performed anytime the temperature is restored to within the limits of Figure 3.1.7-2, to ensure that no significant boron precipitation occurred. The 31 day Frequency of this Surveillance is appropriate because of the relatively slow variation of sodium pentaborate concentration between surveillances.

## <u>SR 3.1.7.7</u>

Demonstrating that each SLC System pump develops a flow rate  $\geq 40$  gpm at a discharge pressure  $\geq 1275$  psig ensures that pump performance has not degraded during the fuel cycle. This minimum pump flow rate requirement ensures that, when combined with the sodium pentaborate solution concentration requirements, the rate of negative reactivity insertion from the SLC System will adequately compensate for the positive reactivity effects encountered during power reduction, cooldown of the moderator, and xenon decay. This test confirms one point on the pump design curve and is indicative of overall performance. Such inservice tests confirm component OPERABILITY, and detect incipient failures by indicating abnormal performance. The Frequency of this Surveillance is in accordance with the Inservice Testing Program.

## SR 3.1.7.8 and SR 3.1.7.9

These Surveillances ensure that there is a functioning flow path from the boron solution storage tank to the RPV, including the firing of an explosive valve. The replacement charge for the explosive valve shall be from the same manufactured batch as the one fired or from another batch that has been certified by having one of that batch successfully fired. The pump and explosive valve tested

SURVEILLANCE REQUIREMENTS

#### SR 3.1.7.8 and SR 3.1.7.9 (continued)

should be alternated such that both complete flow paths are tested every 48 months at alternating 24 month intervals. The Surveillance may be performed in separate steps to prevent injecting boron into the RPV. An acceptable method for verifying flow from the pump to the RPV is to pump demineralized water from a test tank through one SLC subsystem and into the RPV. The 24 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown these components usually pass the Surveillance when performed at the 24 month Frequency; therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

Demonstrating that all heat traced piping between the boron solution storage tank and the suction inlet to the injection pumps is unblocked ensures that there is a functioning flow path for injecting the sodium pentaborate solution. An acceptable method for verifying that the suction piping is unblocked is to pump from the storage tank to the storage tank.

The 24 month Frequency is acceptable since there is a low probability that the subject piping will be blocked due to precipitation of the boron from solution in the heat traced piping. This is especially true in light of the temperature verification of this piping required by SR 3.1.7.3. However, if, in performing SR 3.1.7.3, it is determined that the temperature of this piping has fallen below the specified minimum, SR 3.1.7.9 must be performed once within 24 hours after the piping temperature is restored to within the limits of Figure 3.1.7-2.

REFERENCES 1. 10 CFR 50.62.

2. UFSAR, Section 9.3.5.3.

### B 3.1 REACTIVITY CONTROL SYSTEMS

B 3.1.8 Scram Discharge Volume (SDV) Vent and Drain Valves

## BASES

BACKGROUND	The SDV vent and drain valves are normally open and discharge any accumulated water in the SDV to ensure that sufficient volume is available at all times to allow a complete scram. During a scram, the SDV vent and drain valves close to contain reactor water. The SDV is a volume of header piping that connects to each hydraulic control unit (HCU) and drains into an instrument volume. There are two SDVs (headers) and two instrument volumes, each receiving approximately one half of the control rod drive (CRD) discharges. Each instrument volume has a drain line with two valves in series. Each header is connected to a common vent line via two valves in series. The header piping is sized to receive and contain all the water discharged by the CRDs during a scram. The design and functions of the SDV are described in Reference 1.
APPLICABLE SAFETY ANALYSES	The Design Basis Accident and transient analyses assume all of the control rods are capable of scramming. The acceptance criteria for the SDV vent and drain valves are that they operate automatically to:
	a. Close during scram to limit the amount of reactor coolant discharged so that adequate core cooling is maintained and offsite doses remain within the limits of 10 CFR 100 (Ref. 2); and
	b. Open on scram reset to maintain the SDV vent and drain path open so that there is sufficient volume to accept the reactor coolant discharged during a scram.
	Isolation of the SDV can also be accomplished by manual closure of the SDV valves. Additionally, the discharge of reactor coolant to the SDV can be terminated by scram reset or closure of the HCU manual isolation valves. For a bounding leakage case, the offsite doses are well within the limits of 10 CFR 100 (Ref. 2), and adequate core cooling is maintained (Ref. 3). The SDV vent and drain valves allow continuous drainage of the SDV during normal plant operation
	(continued)

APPLICABLE SAFETY ANALYSES (continued)	to ensure that the SDV has sufficient capacity to contain the reactor coolant discharge during a full core scram. To automatically ensure this capacity, a reactor scram (LCO 3.3.1.1, "Reactor Protection System (RPS) Instrumentation") is initiated if the SDV water level in the instrument volume exceeds a specified setpoint. The setpoint is chosen so that all control rods are inserted before the SDV has insufficient volume to accept a full scram.

SDV vent and drain valves satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

LCO The OPERABILITY of all SDV vent and drain valves ensures that the SDV vent and drain valves will close during a scram to contain reactor water discharged to the SDV piping. Since the vent and drain lines are provided with two valves in series, the single failure of one valve in the open position will not impair the isolation function of the system. Additionally, the valves are required to open on scram reset to ensure that a path is available for the SDV piping to drain freely at other times.

- APPLICABILITY In MODES 1 and 2, a scram may be required; therefore, the SDV vent and drain valves must be OPERABLE. In MODES 3 and 4, control rods are not able to be withdrawn since the reactor mode switch is in shutdown and a control rod block is applied. Also, during MODE 5, only a single control rod can be withdrawn from a core cell containing fuel assemblies. Therefore, the SDV vent and drain valves are not required to be OPERABLE in these MODES since the reactor is subcritical and only one rod may be withdrawn and subject to scram.
- ACTIONS The ACTIONS Table is modified by a Note indicating that a separate Condition entry is allowed for each SDV vent and drain line. This is acceptable, since the Required Actions for each Condition provide appropriate compensatory actions for each inoperable SDV line. Complying with the Required Actions may allow for continued operation, and subsequent inoperable SDV lines are governed by subsequent Condition entry and application of associated Required Actions.

ACTIONS (continued) The ACTIONS Table is modified by a second Note stating that an isolated line may be unisolated under administrative control to allow draining and venting of the SDV. When a line is isolated, the potential for an inadvertent scram due to high SDV level is increased. During these periods, the line may be unisolated under administrative control. This allows any accumulated water in the line to be drained, to preclude a reactor scram on SDV high level. This is acceptable since the administrative controls ensure the valve can be closed quickly, by a dedicated operator at the valve controls, if a scram occurs with the valve open.

## <u>A.1</u>

When one SDV vent or drain valve is inoperable in one or more lines, the line must be isolated to contain the reactor coolant during a scram. The 7 day Completion Time is reasonable, given the level of redundancy in the lines and the low probability of a scram occurring while the valve(s) are inoperable and the line(s) not isolated. The SDV is still isolable since the redundant valve in the affected line is OPERABLE. During these periods, the single failure criterion may not be preserved, and a higher risk exists to allow reactor water out of the primary system during a scram.

## <u>B.1</u>

If both valves in a line are inoperable, the line must be isolated to contain the reactor coolant during a scram. The 8 hour Completion Time to isolate the line is based on the low probability of a scram occurring while the line is not isolated and unlikelihood of significant CRD seal leakage.

## <u>C.1</u>

If any Required Action and associated Completion Time is not met, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to MODE 3 within 12 hours. The allowed Completion

REOUTREMENTS

#### ACTIONS C.1 (continued)

Time of 12 hours is reasonable, based on operating experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging plant systems.

### SURVEILLANCE <u>SR 3.1.8.1</u>

During normal operation, the SDV vent and drain valves should be in the open position (except when performing SR 3.1.8.2) to allow for drainage of the SDV piping. Verifying that each valve is in the open position ensures that the SDV vent and drain valves will perform their intended functions during normal operation. This SR does not require any testing or valve manipulation; rather, it involves verification that the valves are in the correct position.

The 31 day Frequency is based on engineering judgment and is consistent with the procedural controls governing valve operation, which ensure correct valve positions. Improper valve position (closed) would not affect the isolation function.

#### SR 3.1.8.2

During a scram, the SDV vent and drain valves should close to contain the reactor water discharged to the SDV piping. Cycling each valve through its complete range of motion (closed and open) ensures that the valve will function properly during a scram. The 92 day Frequency is based on operating experience and takes into account the level of redundancy in the system design.

## SR 3.1.8.3

SR 3.1.8.3 is an integrated test of the SDV vent and drain valves to verify total system performance. After receipt of a simulated or actual scram signal, the closure of the SDV vent and drain valves is verified. The closure time of 30 seconds after receipt of a scram signal is based on the

(continued)

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REOUTREMENTS

## SURVEILLANCE <u>SR 3.1.8.3</u> (continued)

bounding leakage case evaluated in the accident analysis (Ref. 3). Similarly, after receipt of a simulated or actual scram reset signal, the opening of the SDV vent and drain valves is verified. The LOGIC SYSTEM FUNCTIONAL TEST in LCO 3.3.1.1 and the scram time testing of control rods in LCO 3.1.3, "Control Rod OPERABILITY," overlap this Surveillance to provide complete testing of the assumed safety function. The 24 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown these components usually pass the Surveillance when performed at the 24 month Frequency; therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

- REFERENCES 1. UFSAR, Section 4.6.3.3.2.8.
  - 2. 10 CFR 100.
    - NUREG-0803, "Generic Safety Evaluation Report Regarding Integrity of BWR Scram System Piping," August 1981.

## B 3.2 POWER DISTRIBUTION LIMITS

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B 3.2.1 AVERAGE PLANAR LINEAR HEAT GENERATION RATE (APLHGR)

BASES

BACKGROUND	The APLHGR is a measure of the average LHGR of all the fuel rods in a fuel assembly at any axial location. Limits on the APLHGR are specified to ensure that the criteria specified in 10 CFR 50.46 are met during the postulated design basis loss of coolant accident (LOCA).
APPLICABLE SAFETY ANALYSES	The analytical methods and assumptions used in evaluating Design Basis Accidents (DBAs) that determine the APLHGR limits are presented in References 1, 2, 3, and 4. LOCA analyses are performed to ensure that the APLHGR limits are adequate to meet the peak cladding temperature (PCT) and maximum oxidation limits of 10 CFR 50.46. The analysis is performed using calculational models that are consistent with the requirements of 10 CFR 50, Appendix K. A complete discussion of the analysis code is provided in Reference 1. The PCT following a postulated LOCA is a function of the average heat generation rate of all the rods of a fuel assembly at any axial location and is not strongly influenced by the rod to rod power distribution within an assembly. A conservative multiplier is applied to the LHGR and APLHGR assumed in the LOCA analysis to account for the uncertainty associated with the measurement of the APLHGR. APLHGR limits are typically set high enough such that the LHGR limits are more limiting than the APLHGR limits.
	limitation is due to the conservative analysis assumption of an earlier departure from nucleate boiling with one recirculation loop available, resulting in a more severe cladding heatup during a LOCA.
	The APLHGR satisfies Criterion 2 of 10 CFR 50.36(c)(2)(ii).
	(continued)

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## BASES (continued)

LCO The APLHGR limits specified in the COLR are the result of the DBA analyses. For two recirculation loops operating, the limit is determined from the exposure dependent APLHGR limits. With only one recirculation loop in operation, in conformance with the requirements of LCO 3.4.1, "Recirculation Loops Operating," the limit is determined by multiplying the exposure dependent APLHGR limit by the Single Loop Operation (SLO) multiplier, the SLO multiplier has been determined by a specific single recirculation loop analysis.

APPLICABILITY The APLHGR limits are derived from LOCA analyses that are assumed to occur at high power levels. Studies and operating experience have shown that as power is reduced, the margin to the required APLHGR limits increases. This trend continues down to the power range of 5% to 15% RTP when entry into MODE 2 occurs. When in MODE 2, the intermediate range monitor scram function provides prompt scram initiation during any significant transient, thereby effectively removing any APLHGR limit compliance concern in MODE 2. Therefore, at THERMAL POWER levels ≤ 25% RTP, the reactor is operating with substantial margin to the APLHGR limits; thus, this LCO is not required.

ACTIONS <u>A.1</u>

If any APLHGR exceeds the required limits, an assumption regarding an initial condition of the DBA analysis may not be met. Therefore, prompt action should be taken to restore the APLHGR(s) to within the required limits such that the plant operates within analyzed conditions and within design limits of the fuel rods. The 2 hour Completion Time is sufficient to restore the APLHGR(s) to within its limits and is acceptable based on the low probability of a DBA occurring simultaneously with the APLHGR out of specification.

## <u>B.1</u>

If the APLHGR cannot be restored to within its required limits within the associated Completion Time, the plant must be brought to a MODE or other specified condition in which the LCO does not apply. To achieve this status, THERMAL

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ACTIONS	<u>B.1</u> (continued) POWER must be reduced to < 25% RTP within 4 hours. The allowed Completion Time is reasonable, based on operating experience, to reduce THERMAL POWER to < 25% RTP in an orderly manner and without challenging plant systems. <u>SR 3.2.1.1</u> APLHGRs are required to be initially calculated within 12 hours after THERMAL POWER is $\geq$ 25% RTP and then every 24 hours thereafter. They are compared to the specified limits in the COLR to ensure that the reactor is operating within the assumptions of the safety analysis. The 24 hour Frequency is based on both engineering judgment and recognition of the slowness of changes in power distribution during normal operation. The 12 hour allowance after THERMAL POWER $\geq$ 25% RTP is achieved is acceptable given the large inherent margin to operating limits at low power levels.	
SURVEILLANCE REQUIREMENTS		
REFERENCES	<ol> <li>EMF-94-217(NP), "Boiling Water Reactor Licensing Methodology Summary," Revision 1, November 1995.</li> </ol>	
	2. UFSAR, Chapter 4.	
	3. UFSAR, Chapter 6.	
	4. UFSAR, Chapter 15.	

## B 3.2 POWER DISTRIBUTION LIMITS

## B 3.2.2 MINIMUM CRITICAL POWER RATIO (MCPR)

BASES

BACKGROUND	MCPR is a ratio of the fuel assembly power that would result in the onset of boiling transition to the actual fuel assembly power. The MCPR Safety Limit (SL) is set such that 99.9% of the fuel rods are expected to avoid boiling transition if the limit is not violated (refer to the Bases for SL 2.1.1.2). The operating limit MCPR is established to ensure that no fuel damage results during anticipated operational occurrences (AOOs). Although fuel damage does not necessarily occur if a fuel rod actually experienced boiling transition (Ref. 1), the critical power at which boiling transition is calculated to occur has been adopted as a fuel design criterion.
	The onset of transition boiling is a phenomenon that is readily detected during the testing of various fuel bundle designs. Based on these experimental data, correlations have been developed to predict critical bundle power (i.e., the bundle power level at the onset of transition boiling) for a given set of plant parameters (e.g., reactor vessel pressure, flow, and subcooling). Because plant operating conditions and bundle power levels are monitored and determined relatively easily, monitoring the MCPR is a convenient way of ensuring that fuel failures due to inadequate cooling do not occur.
APPLICABLE SAFETY ANALYSES	The analytical methods and assumptions used in evaluating the AOOs to establish the operating limit MCPR are presented in References 2, 3, 4, 5, 6, 7, 8, and 9. To ensure that the MCPR SL is not exceeded during any transient event that occurs with moderate frequency, limiting transients have been analyzed to determine the largest reduction in critical power ratio (CPR). The types of transients evaluated are loss of flow, increase in pressure and power, positive reactivity insertion, and coolant temperature decrease. The limiting transient yields the largest change in CPR ( $\Delta$ CPR). When the largest $\Delta$ CPR is added to the MCPR SL, the required operating limit MCPR is obtained.

The MCPR operating limits derived from the transient APPLICABLE SAFETY ANALYSES analysis are dependent on the operating core flow state  $(MCPR_f)$  to ensure adherence to fuel design limits during the (continued) worst transient that occurs with moderate frequency as identified in UFSAR, Chapter 15 (Ref. 5). Flow dependent MCPR limits are determined by steady state thermal hydraulic methods with key physics response inputs benchmarked using the three dimensional BWR simulator code (Ref. 8) and a multichannel thermal hydraulic code (Ref. 9) to analyze slow flow runout transients on a cyclespecific basis. For core flows less than rated, the established MCPR operating limit is adjusted to provide protection of the MCPR SL in the event of an uncontrolled recirculation flow increase to the physical limit of the Protection is provided for manual and automatic flow pump. control by applying appropriate flow dependent MCPR operating limits. The MCPR operating limit for a given flow state is the greater of the rated conditions MCPR operating limit or the flow dependent MCPR operating limit. For automatic flow control, in addition to protecting the MCPR · SL during the flow run-up event, protection is provided by the flow dependent MCPR operating limit to prevent exceeding the rated flow MCPR operating limit during an automatic flow increase to rated core flow. The operating limit is dependent on the maximum core flow limiter setting in the Recirculation Flow Control System. The MCPR satisfies Criterion 2 of 10 CFR 50.36(c)(2)(ii).

The MCPR operating limits specified in the COLR are the LC0 result of the Design Basis Accident (DBA) and transient analysis. The operating limit MCPR is determined by the larger of the appropriate MCPR, or the rated condition MCPR limit.

The MCPR operating limits are primarily derived from APPLICABILITY transient analyses that are assumed to occur at high power levels. Below 25% RTP, the reactor is operating at a low recirculation pump speed and the moderator void ratio is small. Surveillance of thermal limits below 25% RTP is unnecessary due to the large inherent margin that ensures that the MCPR SL is not exceeded even if a limiting

transient occurs. Statistical analyses indicate that the APPLICABILITY nominal value of the initial MCPR expected at 25% RTP is (continued) > 3.5. Studies of the variation of limiting transient behavior have been performed over the range of power and flow conditions. These studies encompass the range of key actual plant parameter values important to typically limiting transients. The results of these studies demonstrate that a margin is expected between performance and the MCPR requirements, and that margins increase as power is reduced to 25% RTP. This trend is expected to continue to the 5% to 15% power range when entry into MODE 2 occurs. When in MODE 2. the intermediate range monitor provides rapid scram initiation for any significant power increase transient, which effectively eliminates any MCPR compliance concern. Therefore, at THERMAL POWER levels < 25% RTP, the reactor is operating with substantial margin to the MCPR limits and this LCO is not required.

## ACTIONS

If any MCPR is outside the required limits, an assumption regarding an initial condition of the design basis transient analyses may not be met. Therefore, prompt action should be taken to restore the MCPR(s) to within the required limits such that the plant remains operating within analyzed conditions. The 2 hour Completion Time is normally sufficient to restore the MCPR(s) to within its limits and is acceptable based on the low probability of a transient or DBA occurring simultaneously with the MCPR out of specification.

## <u>B.1</u>

A.1

If the MCPR cannot be restored to within its required limits within the associated Completion Time, the plant must be brought to a MODE or other specified condition in which the LCO does not apply. To achieve this status, THERMAL POWER must be reduced to < 25% RTP within 4 hours. The allowed Completion Time is reasonable, based on operating experience, to reduce THERMAL POWER to < 25% RTP in an orderly manner and without challenging plant systems.

## BASES (continued)

SURVEILLANCE REQUIREMENTS	<u>SR 3.2.2.1</u>
	The MCPR is required to be initially calculated within 12 hours after THERMAL POWER is $\geq 25\%$ RTP and then every 24 hours thereafter. It is compared to the specified limits in the COLR to ensure that the reactor is operating within the assumptions of the safety analysis. The 24 hour Frequency is based on both engineering judgment and recognition of the slowness of changes in power distribution during normal operation. The 12 hour allowance after THERMAL POWER $\geq 25\%$ RTP is achieved is acceptable given the large inherent margin to operating limits at low power levels.
	<u>SR 3.2.2.2</u>
	Because the transient analyses take credit for conservatism

Because the transient analyses take credit for conservatism in the scram speed performance, it must be demonstrated that the specific scram speed distribution is consistent with that used in the transient analyses. SR 3.2.2.2 determines the actual scram speed distribution and compares it with the assumed distribution. The MCPR operating limit is then determined based on either the applicable limit associated with the scram times of LCO 3.1.4, "Control Rod Scram Times," or the realistic scram times. The MCPR limit, including the scram insertion times for rated and off-rated flow conditions, are contained in the COLR. This determination must be performed once within 72 hours after each set of scram time tests required by SR 3.1.4.1, SR 3.1.4.2, and SR 3.1.4.4 because the effective scram speed distribution may change during the cycle or after maintenance that could affect scram times. The 72 hour Completion Time is acceptable due to the relatively minor changes in the actual scram speed distribution expected during the fuel cycle.

- REFERENCES 1. NUREG-0562, June 1979.
  - XN-NF-524(P)(A), "Advanced Nuclear Fuels Critical Power Methodology for Boiling Water Reactors," (as specified in Technical Specification 5.6.5).
  - 3. UFSAR, Chapter 4.

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REFERENCES (continued)	4.	UFSAR, Chapter 6.
	5.	UFSAR, Chapter 15.
	6.	EMF-94-217(NP), "Boiling Water Reactor Licensing Methodology Summary," Revision 1, November 1995.
	7.	NFSR-0091, Benchmark of CASMO/MICROBURN BWR Nuclear Design Methods, Commonwealth Edison Topical Report, (as specified in Technical Specification 5.6.5).
	8.	XN–NF–80–19(P)(A), Volume 1, Exxon Nuclear Methodology for Boiling Water Reactors – Neutronics Methods for Design and Analysis, (as specified in Technical Specification 5.6.5).
	9.	XN–NF–80–19(P)(A), Volume 3, Exxon Nuclear Methodology for Boiling Water Reactors – THERMEX Thermal Limits Methodology Summary Description, (as specified in Technical Specification 5.6.5).

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## LHGR B 3.2.3

## B 3.2 POWER DISTRIBUTION LIMITS

# B 3.2.3 LINEAR HEAT GENERATION RATE (LHGR)

BASES

BACKGROUND	The LHGR is a measure of the heat generation rate of a fuel rod in a fuel assembly at any axial location. Limits on LHGR are specified to ensure that fuel design limits are not exceeded anywhere in the core during normal operation, (i.e., steady state). Exceeding the LHGR limit could potentially result in fuel damage and subsequent release of radioactive materials. Fuel design limits are specified to ensure that fuel system damage, fuel rod failure, or inability to cool the fuel does not occur during the normal operations and anticipated operating conditions identified in References 1 and 2.
APPLICABLE SAFETY ANALYSES	The analytical methods and assumptions used in evaluating the fuel system design are presented in References 1 and 2. The fuel assembly is designed to ensure (in conjunction with the core nuclear and thermal hydraulic design, plant equipment, instrumentation, and protection system) that fuel damage will not result in the release of radioactive materials in excess of the guidelines of 10 CFR, Parts 20, 50, and 100. A mechanism that could cause fuel damage during normal operations and operational transients and that is considered in fuel evaluations is a rupture of the fuel rod cladding caused by strain from the relative expansion of the $U0_2$ pellet.
	A value of 1% plastic strain of the fuel cladding has been defined as the limit below which fuel damage caused by overstraining of the fuel cladding is not expected to occur (Ref. 3).
	Fuel design evaluations have been performed and demonstrate that the 1% fuel cladding plastic strain design limit is not exceeded during continuous operation with LHGRs up to the operating limit specified in the COLR. The analysis also includes allowances for short term transient excursions above the operating limit while still remaining within the AOO limits, plus an allowance for densification power spiking.
	The LHGR satisfies Criterion 2 of 10 CFR 50.36(c)(2)(ii).

#### BASES (continued)

LCO The LHGR is a basic assumption in the fuel design analysis. The fuel has been designed to operate at rated core power with sufficient design margin to the LHGR calculated to cause a 1% fuel cladding plastic strain. The LHGR (steady state) limit to accomplish this objective is specified in the COLR.

APPLICABILITY The LHGR limits are derived from fuel design analysis that is limiting at high power level conditions. At core thermal power levels < 25% RTP, the reactor is operating with a substantial margin to the LHGR limits and, therefore, the Specification is only required when the reactor is operating at  $\ge$  25% RTP.

## ACTIONS <u>A.1</u>

If any LHGR exceeds its required limit, an assumption regarding an initial condition of the fuel design analysis is not met. Therefore, prompt action should be taken to restore the LHGR(s) to within its required limits such that the plant is operating within analyzed conditions. The 2 hour Completion Time is normally sufficient to restore the LHGR(s) to within its limits and is acceptable based on the low probability of a transient or Design Basis Accident occurring simultaneously with the LHGR out of specification.

## <u>B.1</u>

If the LHGR cannot be restored to within its required limits within the associated Completion Time, the plant must be brought to a MODE or other specified condition in which the LCO does not apply. To achieve this status, THERMAL POWER is reduced to < 25% RTP within 4 hours. The allowed Completion Time is reasonable, based on operating experience, to reduce THERMAL POWER TO < 25% RTP in an orderly manner and without challenging plant systems.

## BASES (continued)

SURVEILLANCE REQUIREMENTS	<u>SR 3.2.3.1</u> The LHGRs are required to be initially calculated within 12 hours after THERMAL POWER is $\geq 25\%$ RTP and then every 24 hours thereafter. They are compared to the LHGR limits (steady state) in the COLR to ensure that the reactor is operating within the assumptions of the safety analysis. The 24 hour Frequency is based on both engineering judgment and recognition of the slow changes in power distribution during normal operation. The 12 hour allowance after THERMAL POWER $\geq 25\%$ RTP is achieved is acceptable given the large inherent margin to operating limits at lower power levels.
REFERENCES	1. UFSAR, Chapter 4.
	2. UFSAR, Chapter 15.
	<ol> <li>NUREG-0800, Section 4.2.II.A.2(g), Revision 2, July 1981.</li> </ol>

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## B 3.2 POWER DISTRIBUTION LIMITS

B 3.2.4 Average Power Range Monitor (APRM) Gain and Setpoint

#### BASES

BACKGROUND The OPERABILITY of the APRMs and their setpoints is an initial condition of all safety analyses that assume rod insertion upon reactor scram. Applicable final design criteria are discussed in UFSAR, Sections 3.1.2.2.1, 3.1.2.2.4, 3.1.2.3.1, and 3.1.2.3.10 (Ref. 1). This LCO is provided to require the APRM gain or APRM Flow Biased Neutron Flux-High Function Allowable Value (LCO 3.3.1.1, "Reactor Protection System (RPS) Instrumentation," Function 2.b) to be adjusted when operating under conditions of excessive power peaking to maintain acceptable margin to the fuel cladding integrity Safety Limit (SL) and the fuel cladding 1% plastic strain limit.

> The condition of excessive power peaking is determined by Fuel Design Limit Ratio for Centerline Melt (FDLRC), which is defined as:

FDLRC = (LHGR)(1.2); (TLHGR)(FRTP)

where LHGR is the Linear Heat Generation Rate, FRTP is the Fraction of Rated Thermal Power determined by dividing the measured THERMAL POWER by the RTP, and TLHGR is the Transient Linear Heat Generation Rate limit. The TLHGR limit is specified in the COLR and shall be the limit that protects against fuel centerline melting and the fuel cladding 1% plastic strain during transient conditions throughout the life of the fuel.

Maintaining FDLRC less than or equal to 1.0 ensures the fuel does not experience centerline melt during AOOs beginning at any power level and terminating at 120% RTP (APRM Fixed Neutron Flux-High Allowable Value). The APRM Flow Biased Neutron Flux-High Function Allowable Value must be adjusted to ensure that the TLHGR limit is not violated for any power distribution. When FDLRC is greater than 1.0, excessive power peaking exists. To maintain margins similar to those at RTP conditions, the APRM Flow Biased Allowable Value is decreased by 1/FDLRC. As an alternative, this adjustment may also be accomplished by increasing the gain of the APRM by FDLRC. Increasing the APRM gain raises the initial APRM

BACKGROUND (continued) reading closer to the Flow Biased Allowable Value such that a scram would be received at the same point in a transient as if the Allowable Value had been reduced. Thus, increasing the APRM gain by FDLRC provides the same degree of protection as reducing the APRM Flow Biased Neutron Flux - High Function Allowable Value by 1/FDLRC. Either of these adjustments has effectively the same result as maintaining FDLRC less than or equal to 1.0, and thus, maintains RTP margins for APLHGR, MCPR, and LHGR.

> The normally selected APRM Flow Biased Neutron Flux-High Function Allowable Value positions the scram above the upper bound of the normal power/flow operating region that has been considered in the design of the fuel rods. The Allowable Value is flow biased with a slope that approximates the upper flow control line, such that an approximately constant margin is maintained between the flow biased trip level and the upper operating boundary for core flows in excess of about 45% of rated core flow. In the range of infrequent operations below 45% of rated core flow, the margin to scram is reduced because of the nonlinear core flow versus drive flow relationship. The normally selected APRM Allowable Value is supported by the analyses presented in Reference 3 that concentrate on events initiated from rated conditions. Design experience has shown that minimum deviations occur within expected margins to operating limits (APLHGR. MCPR. and LHGR), at rated conditions for normal power distributions. However, at other than rated conditions, control rod patterns can be established that significantly reduce the margin to thermal limits. Therefore, the APRM Flow Biased Neutron Flux-High Function Allowable Value may be reduced during operation when FDLRC indicates an excessive power peaking distribution.

APPLICABLE The acceptance criteria for the APRM gain or setpoint SAFETY ANALYSES adjustments are that acceptable margins (to APLHGR, MCPR, and LHGR) be maintained to the fuel cladding integrity SL and the fuel cladding 1% plastic strain limit.

> UFSAR safety analyses (Ref. 2) concentrate on the rated power condition for which the minimum expected margin to the operating limits (APLHGR, MCPR, and LHGR) occurs. LCO 3.2.1, "AVERAGE PLANAR LINEAR HEAT GENERATION RATE (APLHGR)," LCO 3.2.2, "MINIMUM CRITICAL POWER RATIO (MCPR),"

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and LCO 3.2.3, "LINEAR HEAT GENERATION RATE (LHGR)," limit APPLICABLE the initial margins to these operating limits at rated SAFETY ANALYSES conditions so that specified acceptable fuel design limits (continued) are met during transients initiated from rated conditions. At initial power levels less than rated levels, the margin degradation of the APLHGR, the MCPR, or the LHGR during a transient can be greater than at the rated condition event. This greater margin degradation during the transient is primarily offset by the larger initial margin to limits at the lower than rated power levels. However, power distributions can be hypothesized that would result in reduced margins to the pre-transient operating limit. When combined with the increased severity of certain transients at other than rated conditions, the fuel design limits could be approached. At substantially reduced power levels, highly peaked power distributions could be obtained that could reduce thermal margins to the minimum levels required for transient events. To prevent or mitigate such situations, either the APRM Flow Biased Neutron Flux-High Function Allowable Value is adjusted downward by 1/FDLRC, or the APRM gain is adjusted upward by FDLRC. Either of these adjustments effectively counters the increased severity of some events at other than rated conditions by proportionally increasing the APRM gain or proportionally lowering the APRM Flow Biased Neutron Flux-High Function Allowable Value. dependent on the increased peaking that may be encountered.

The APRM gain and setpoint satisfy Criteria 2 and 3 of 10 CFR 50.36(c)(2)(ii).

LCO	Meeting any one of the following conditions ensures acceptable operating margins for events described above:
	a. Limiting excess power peaking;
	b. Reducing the APRM Flow Biased Neutron Flux-High Function Allowable Value by multiplying the APRM Flow Biased Neutron Flux-High Function Allowable Value by 1/FDLRC; or
	c. Increasing APRM gains to cause the APRM to read greater than or equal to 100% times FRTP times FDLRC. This condition is to account for the reduction in
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LCO (continued)	margin to the fuel cladding integrity SL and the fuel cladding 1% plastic strain limit.
	Maintaining FDLRC less than or equal to 1.0 ensures the fuel does not experience centerline melt during AOOs beginning at any power level and terminating at 120% of RTP. When FDLRC is greater than 1.0, excessive power peaking exists. To compensate for this condition, the APRM Flow Biased Neutron Flux — High Function Allowable Value is adjusted downward by 1/FDLRC or the APRM gain is adjusted upward by FDLRC. When the reactor is operating with the peaking less than the design value, it is not necessary to modify the APRM Flow Biased Neutron Flux — High Function Allowable Value. Modifying the APRM Flow Biased Allowable Value or adjusting the APRM gain is equivalent to maintaining FDLRC less than or equal to 1.0, as stated in the LCO.
	For compliance with LCO 3.2.4.b (APRM Flow Biased Neutron Flux-High Function Allowable Value modification) or LCO 3.2.4.c (APRM gain adjustment), only APRMs required to be OPERABLE per LCO 3.3.1.1, Function 2.b are required to be modified or adjusted. In addition, each APRM may be allowed to have its gain adjusted or Allowable Value modified independently of other APRMs that are having their gain adjusted or Allowable Value modified.
APPLICABILITY	The FDLRC limit, APRM gain adjustment, or APRM Flow Biased Neutron Flux-High Function Allowable Value is provided to ensure that the fuel cladding integrity SL and the fuel cladding 1% plastic strain limit are not violated during design basis transients. As discussed in the Bases for LCO 3.2.1, LCO 3.2.2, and LCO 3.2.3 sufficient margin to these limits exists below 25% RTP and, therefore, these requirements are only necessary when the reactor is operating at $\geq$ 25% RTP.
ACTIONS	A.1 If the APRM gain or Flow Biased Neutron Flux-High Function Allowable Value is not within limits while FDLRC has exceeded 1.0, the margin to the fuel cladding integrity SL and the fuel cladding 1% plastic strain limit may be reduced. Therefore, prompt action should be taken to

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ACTIONS	<u>A.1</u> (continued)
	restore the FDLRC to within its required limit or make acceptable APRM adjustments such that the plant is operating within the assumed margin of the safety analyses.
	The 6 hour Completion Time is normally sufficient to restore either the FDLRC to within limits or to adjust the APRM gain or modify the APRM Flow Biased Neutron Flux-High Function Allowable Value to within limits and is acceptable based on the low probability of a transient or Design Basis Accident occurring simultaneously with the LCO not met.
	<u>B.1</u>
	If FDLRC, the APRM gain, or APRM Flow Biased Neutron Flux- High Function Allowable Value cannot be restored to within its required limits within the associated Completion Time, the plant must be brought to a MODE or other specified condition in which the LCO does not apply. To achieve this status, THERMAL POWER is reduced to < 25% RTP within 4 hours. The allowed Completion Time is reasonable, based on operating experience, to reduce THERMAL POWER to < 25% RTP in an orderly manner and without challenging plant systems.
SURVEILLANCE REQUIREMENTS	<u>SR 3.2.4.1 and SR 3.2.4.2</u>
	The FDLRC is required to be calculated and compared to 1.0 or APRM gain adjusted or APRM Flow Biased Neutron Flux-High Function Allowable Value modified to ensure that the reactor is operating within the assumptions of the safety analysis. These SRs are only required to determine the FDLRC and, assuming FDLRC is greater than 1.0, the appropriate APRM gain or APRM Flow Biased Neutron Flux-High Function

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Allowable Value, and are not intended to be a CHANNEL FUNCTIONAL TEST for the APRM gain or Flow Biased Neutron Flux-High Function circuitry. SR 3.2.4.1 and SR 3.2.4.2

have been modified by Notes, which clarify that the respective SR does not have to be met if the alternate requirement demonstrated by the other SR is satisfied. The 24 hour Frequency of SR 3.2.4.1 is chosen to coincide with the determination of other thermal limits, specifically

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SURVEILLANCE	SR	3.2.4.1	and SR	3.2.4.2	(continued)

those for the APLHGR (LCO 3.2.1), MCPR (LCO 3.2.2), and LHGR (LCO 3.2.3). The 24 hour Frequency is based on both engineering judgment and recognition of the slowness of changes in power distribution during normal operation. The 12 hour allowance after THERMAL POWER  $\geq$  25% RTP is achieved is acceptable given the large inherent margin to APLHGR, MCPR, and LHGR operating limits at low power levels.

The 12 hour Frequency of SR 3.2.4.2 is required when FDLRC is greater than 1.0, because more rapid changes in power distribution are typically expected.

REFERENCES	1.	UFSAR, Sections	3.1.2.2.1,	3.1.2.2.4,	3.1.2.3.1,	and
		3.1.2.3.10.				

2. UFSAR, Chapter 15.

## **B 3.3 INSTRUMENTATION**

# B 3.3.1.1 Reactor Protection System (RPS) Instrumentation

#### BASES

BACKGROUND The RPS initiates a reactor scram when one or more monitored parameters exceed their specified limits to preserve the integrity of the fuel cladding and the reactor coolant pressure boundary (RCPB) and minimize the energy that must be absorbed following a loss of coolant accident (LOCA). This can be accomplished either automatically or manually.

> The protection and monitoring functions of the RPS have been designed to ensure safe operation of the reactor. This is achieved by specifying limiting safety system settings (LSSS) in terms of parameters directly monitored by the RPS, as well as LCOs on other reactor system parameters and equipment performance. The LSSS are defined in this Specification as the Allowable Values, which, in conjunction with the LCOs, establish the threshold for protective system action to prevent exceeding acceptable limits, including Safety Limits (SLs) during Design Basis Accidents (DBAs).

> The RPS, as described in the UFSAR, Section 7.2 (Ref. 1), includes sensors, relays, bypass circuits, and switches that are necessary to cause initiation of a reactor scram. Functional diversity is provided by monitoring a wide range of dependent and independent parameters. The input parameters to the scram logic are from instrumentation that monitors reactor vessel water level, reactor vessel pressure, neutron flux, main steam line isolation valve position, turbine control valve (TCV) fast closure, turbine stop valve (TSV) position, drywell pressure, scram discharge volume (SDV) water level, and turbine condenser vacuum, as well as reactor mode switch in shutdown position and manual scram signals. There are at least four redundant sensor input signals from each of these parameters (with the exception of the reactor mode switch in shutdown and manual scram signals). Most channels include electronic equipment (e.g., trip units) that compares measured input signals with pre-established setpoints. When the setpoint is exceeded, the channel output relay actuates, which then outputs an RPS trip signal to the trip logic.

The RPS is comprised of two independent trip systems BACKGROUND (A and B) with three logic channels in each trip system (continued) (automatic logic channels A1 and A2 and manual logic channel A3, automatic logic channels B1 and B2 and manual logic channel B3) as described in Reference 1. The outputs of the automatic logic channels in a trip system are combined in a one-out-of-two logic so that either channel can trip the associated trip system. The tripping of both trip systems will produce a reactor scram. This logic arrangement is referred to as a one-out-of-two taken twice logic. There are four RPS channel test switches, one associated with each of the four automatic trip channels. These test switches allow the operator to test the OPERABILITY of the individual trip channel automatic scram contactors. In addition, trip channels A3 and B3 (one trip channel per trip system) are provided for manual scram. Placing the reactor mode switch in shutdown position or depressing both manual scram push buttons (one per trip system) will initiate the manual trip function. Each trip system can be reset by use of a reset switch. If a full scram occurs (both trip systems trip) and after the reactor mode switch is placed in the shutdown position, a relay prevents reset of the trip systems for 10 seconds. This 10 second delay on reset ensures that the scram function will be completed.

> Two scram pilot valves are located in the hydraulic control unit for each control rod drive (CRD). Each scram pilot valve is solenoid operated, with the solenoids normally energized. The scram pilot valves control the air supply to the scram inlet and outlet valves for the associated CRD. When either scram pilot valve solenoid is energized, air pressure holds the scram valves closed and, therefore, both scram pilot valve solenoids must be de-energized to cause a control rod to scram. The scram valves control the supply and discharge paths for the CRD water during a scram. One of the scram pilot valve solenoids for each CRD is controlled by trip system A, and the other solenoid is controlled by trip system B. Any trip of trip system A in conjunction with any trip in trip system B results in de-energizing both solenoids, air bleeding off, scram valves opening, and control rod scram.

BACKGROUND (continued)	The backup scram valves, which energize on a scram signal to depressurize the scram air header, are also controlled by the RPS. Additionally, the RPS System controls the SDV vent and drain valves such that when both trip systems trip, the SDV vent and drain valves close to isolate the SDV.
APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY	The actions of the RPS are assumed in the safety analyses of References 2, 3, and 4. The RPS initiates a reactor scram when monitored parameter values exceed the Allowable Values, specified by the setpoint methodology and listed in Table 3.3.1.1-1 to preserve the integrity of the fuel cladding, the RCPB, and the containment by minimizing the energy that must be absorbed following a LOCA.
	RPS instrumentation satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii). Functions not specifically credited in the accident analysis are retained for the overall redundancy and diversity of the RPS as required by the NRC approved licensing basis.
	The OPERABILITY of the RPS is dependent on the OPERABILITY of the individual instrumentation channel Functions specified in Table 3.3.1.1-1. Each Function must have a required number of OPERABLE channels per RPS trip system, with their setpoints within the specified Allowable Value, where appropriate. The actual setpoint is calibrated consistent with applicable setpoint methodology assumptions. Each channel must also respond within its assumed response time, where applicable.
	Allowable Values are specified for each RPS Function specified in the Table. Nominal trip setpoints are specified in the setpoint calculations. The nominal setpoints are selected to ensure that the actual setpoints do not exceed the Allowable Value between successive CHANNEL CALIBRATIONS. Operation with a trip setpoint less conservative than the nominal trip setpoint, but within its Allowable Value, is acceptable. A channel is inoperable if its actual trip setpoint is not within its required Allowable Value.
	(continued)

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued) Trip setpoints are those predetermined values of output at which an action should take place. The setpoints are compared to the actual process parameter (e.g., reactor vessel water level), and when the measured output value of the process parameter exceeds the setpoint, the associated device (e.g., trip unit) changes state. The analytic limits are derived from the limiting values of the process parameters obtained from the safety analysis.

For nuclear instrumentation Functions (i.e., Functions 1.a, 2.a, 2.b, and 2.c), the Allowable Values are derived from the analytic limits, corrected for calibration, process, and some of the instrument errors. The trip setpoints for these Functions are then determined accounting for the remaining instrument errors (e.g., drift). The trip setpoints derived in this manner provide adequate protection because instrumentation uncertainties, process effects, calibration tolerances, instrument drift, and severe environment errors (for channels that must function in harsh environments as defined by 10 CFR 50.49) are accounted for and appropriately applied for the instrumentation.

For all Functions other than these associated with nuclear instrumentation (i.e., other than Functions 1.a, 2.a, 2.b, and 2.c), the trip setpoints are determined from the analytic limits, corrected for defined process, calibration, and instrument errors. The Allowable Values are then determined, based on the trip setpoint values, by accounting for the calibration based errors. These calibration based errors are limited to reference accuracy, instrument drift, errors associated with measurement and test equipment, and calibration tolerance of loop components. The trip setpoints and Allowable Values determined in this manner provide adequate protection because instrument uncertainties, process effects, calibration tolerances, instrument drift, and severe environment errors (for channels that must function in harsh environments as defined by 10 CFR 50.49) are accounted for and appropriately applied for the instrumentation.

The OPERABILITY of scram pilot valves and associated solenoids, backup scram valves, and SDV valves, described in the Background section, are not addressed by this LCO.

(continued)

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

The individual Functions are required to be OPERABLE in the S, MODES or other conditions specified in the table, which may require an RPS trip to mitigate the consequences of a design basis accident or transient. To ensure a reliable scram function, a combination of Functions are required in each MODE to provide primary and diverse initiation signals.

The only MODES specified in Table 3.3.1.1-1 are MODES 1 and 2, and MODE 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies. No RPS Function is required in MODES 3 and 4, since all control rods are fully inserted and the Reactor Mode Switch Shutdown Position control rod withdrawal block (LCO 3.3.2.1) does not allow any control rod to be withdrawn. In MODE 5, control rods withdrawn from a core cell containing no fuel assemblies do not affect the reactivity of the core and, therefore, are not required to have the capability to scram. Provided all other control rods remain inserted, no RPS Function is required. In this condition, the required SDM (LCO 3.1.1) and refuel position one-rod-out interlock (LCO 3.9.2) ensure that no event requiring RPS will occur. Under these conditions, the RPS function is not required to be OPERABLE.

The specific Applicable Safety Analyses, LCO, and Applicability discussions are listed below on a Function by Function basis.

## Intermediate Range Monitor (IRM)

# 1.a. Intermediate Range Monitor Neutron Flux-High

The IRMs monitor neutron flux levels from the upper range of the source range monitor (SRM) to the lower range of the average power range monitors (APRMs). The IRMs are capable of generating trip signals that can be used to prevent fuel damage resulting from abnormal operating transients in the intermediate power range. In this power range, the most significant source of reactivity change is due to control rod withdrawal. The IRM provides a diverse protection function from the rod worth minimizer (RWM), which monitors and controls the movement of control rods at low power. The

LCO, and APPLICABILITY	RWM prevents the withdrawal of an out of sequence control rod during startup that could result in an unacceptable neutron flux excursion (Ref. 5). The IRM provides mitigation of the neutron flux excursion. To demonstrate the capability of the IRM System to mitigate control rod withdrawal events, generic analysis has been performed (Ref. 6) to evaluate the consequences of control rod withdrawal events during startup that are mitigated only by the IRM. This analysis, which assumes that one IRM channel in each trip system is bypassed, demonstrates that the IRMs provide protection against local control rod withdrawal errors and results in peak fuel enthalpy below the 170 cal/gm fuel failure threshold criterion.	
	The IRMs are also capable of limiting other reactivity excursions during startup, such as cold water injection events, although no credit is specifically assumed.	
	The IRM System is divided into two groups of IRM channels, with four IRM channels inputting to each trip system. The analysis of Reference 6 assumes that one channel in each trip system is bypassed. Therefore, six channels with thre channels in each trip system are required for IRM OPERABILITY to ensure that no single instrument failure wil preclude a scram from this Function on a valid signal. Thi trip is active in each of the 10 ranges of the IRM, which must be selected by the operator to maintain the neutron flux within the monitored level of an IRM range.	1
	The analysis of Reference 6 has adequate conservatism to permit the IRM Allowable Value specified in Table 3.3.1.1-1	•
	The Intermediate Range Monitor Neutron Flux-High Function must be OPERABLE during MODE 2 when control rods may be withdrawn and the potential for criticality exists. In MODE 5, when a cell with fuel has its control rod withdrawn the IRMs provide monitoring for and protection against unexpected reactivity excursions. In MODE 1, the APRM System, the RWM, and Rod Block Monitor provide protection against control rod withdrawal error events and the IRMs ar not required. The IRMs are automatically bypassed when the Reactor Mode Switch is in the run position.	e
	(continued)	<u>)</u>
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APPLICABLE <u>1.a. Intermediate Range Monitor Neutron Flux-High</u> SAFETY ANALYSES, (continued)

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)	<u>1.b. Intermediate Range Monitor – Inop</u>
	This trip signal provides assurance that a minimum number of IRMs are OPERABLE. Anytime an IRM mode switch is moved to any position other than "Operate," the detector voltage drops below a preset level, or when a module is not plugged in, an inoperative trip signal will be received by the RPS unless the IRM is bypassed. Since only one IRM in each trip system may be bypassed, only one IRM in each RPS trip system may be inoperable without resulting in an RPS trip signal.
	This Function was not specifically credited in the accident analysis but it is retained for the overall redundancy and diversity of the RPS as required by the NRC approved licensing basis.
	Six channels of Intermediate Range Monitor — Inop with three channels in each trip system are required to be OPERABLE to ensure that no single instrument failure will preclude a scram from this Function on a valid signal.
	There is no Allowable Value for this Function.
	This Function is required to be OPERABLE when the Intermediate Range Monitor Neutron Flux-High Function is required.
	<u>Average Power Range Monitor</u>
	<u>2.a. Average Power Range Monitor Neutron Flux-High.</u> <u>Setdown</u>
	The APRM channels receive input signals from the local power range monitors (LPRMs) within the reactor core, which provide an indication of the power distribution and local power changes. The APRM channels average these LPRM signals to provide a continuous indication of average reactor power from a few percent to greater than RTP. For operation at low power (i.e., MODE 2), the Average Power Range Monitor Neutron Flux-High, Setdown Function is capable of generating a trip signal that prevents fuel damage resulting from abnormal operating transients in this power range. For most operation at low power levels, the Average Power Range

APPLICABLE SAFETY ANALYSES, LCO, and	<u>2.a. Average Power Range Monitor Neutron Flux-High, Setdown</u> (continued)
APPLICABILITY	Monitor Neutron Flux-High, Setdown Function will provide a secondary scram to the Intermediate Range Monitor Neutron Flux-High Function because of the relative setpoints. With the IRMs at Range 9 or 10, it is possible that the Average Power Range Monitor Neutron Flux-High, Setdown Function will provide the primary trip signal for a core-wide increase in power.
	No specific safety analyses take direct credit for the Average Power Range Monitor Neutron Flux — High, Setdown Function. However, this Function indirectly ensures that before the reactor mode switch is placed in the run position, reactor power does not exceed 25% RTP (SL 2.1.1.1) when operating at low reactor pressure and low core flow. Therefore, it indirectly prevents fuel damage during significant reactivity increases with THERMAL POWER < 25% RTP.
	The APRM System is divided into two groups of channels with three APRM channel inputs to each trip system. The system is designed to allow one channel in each trip system to be bypassed. Any one APRM channel in a trip system can cause the associated trip system to trip. Four channels of Average Power Range Monitor Neutron Flux-High, Setdown with two channels in each trip system are required to be OPERABLE to ensure that no single failure will preclude a scram from this Function on a valid signal. In addition, to provide adequate coverage of the entire core, at least 50% of the LPRM inputs are required for each APRM channel, with at least two LPRM inputs from each of the four axial levels at which the LPRMs are located.
	The Allowable Value is based on preventing significant increases in power when THERMAL POWER is < 25% RTP.
	The Average Power Range Monitor Neutron Flux-High, Setdown Function must be OPERABLE during MODE 2 when control rods may be withdrawn and the potential for fuel damage from abnormal operating transients exists. In MODE 1, the
	(continued)

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY	<u>2.a. Average Power Range Monitor Neutron Flux-High,</u> <u>Setdown</u> (continued)
	Average Power Range Monitor Neutron Flux—High Function provides protection against reactivity transients and the RWM and rod block monitor protect against control rod
	withdrawal error events.

# <u>2.b.</u> Average Power Range Monitor Flow Biased Neutron Flux-High

The Average Power Range Monitor Flow Biased Neutron Flux-High Function monitors neutron flux. The APRM neutron flux trip level is varied as a function of recirculation drive flow (i.e., at lower core flows, the setpoint is reduced proportional to the reduction in power experienced as core flow is reduced but is clamped at an upper limit that is equivalent to the Average Power Range Monitor Fixed Neutron Flux-High Function Allowable Value. The Average Power Range Monitor Flow Biased Neutron Flux-High Function provides protection against transients where THERMAL POWER increases slowly (such as the recirculation loop flow controller failure event with increasing flow and the loss of feedwater heating event) and protects the fuel cladding integrity by ensuring that the MCPR SL is not exceeded. During any transient event that occurs at a reduced recirculation flow, because of a lower scram trip setpoint, the Average Power Range Monitor Flow Biased Neutron Flux-High Function will initiate a scram before the clamped Allowable Value is reached.

The APRM System is divided into two groups of channels with three APRM channels providing inputs to each trip system. The system is designed to allow one channel in each trip system to be bypassed. Any one APRM channel in a trip system can cause the associated trip system to trip. Four channels of Average Power Range Monitor Flow Biased Neutron Flux-High with two channels in each trip system arranged in

APPLICABLE SAFETY ANALYSES, LCO, and	<u>2.b. Average Power Range Monitor Flow Biased Neutron</u> <u>Flux-High</u> (continued)
APPLICABILITY	a one-out-of-two logic are required to be OPERABLE to ensure that no single instrument failure will preclude a scram from this Function on a valid signal. In addition, to provide adequate coverage of the entire core, at least 50% of the LPRM inputs are required for each APRM channel, with at least two LPRM inputs from each of the four axial levels at which the LPRMs are located. Each APRM channel receives one total drive flow signal representative of total core flow. The total drive flow signals are generated by two flow converters, one of which supplies signals to the trip system A APRMs, while the other supplies signals to the trip system B APRMs. Each flow converter signal is provided by summing up a flow signal from the two recirculation loops. Each required Average Power Range Monitor Flow Biased Neutron Flux - High channel requires an input from one OPERABLE flow converter (e.g., if a converter unit is inoperable, the associated Average Power Range Monitor Flow Biased Neutron Flux - High channels must be considered inoperable). An APRM flow converter is considered inoperable whenever it cannot deliver a flow signal less than or equal to actual recirculation flow conditions for all steady state and transient reactor conditions while in MODE 1. Reduced flow or downscale flow converter conditions due to planned maintenance or testing activities during derated plant conditions (i.e., end of cycle coast down) will result in conservative setpoints for the APRM flow bias functions, thus maintaining the function OPERABLE.
	The Allowable Value is selected to ensure the fuel cladding integrity by ensuring that the MCPR SL is not exceeded. "W," in the Allowable Value column of Table 3.3.1.1-1, is the percentage of recirculation loop flow which provides a rated core flow of 98 million lbs/hr.
	The Average Power Range Monitor Flow Biased Neutron Flux—High Function is required to be OPERABLE in MODE 1 when there is the possibility of generating excessive
	(continued)

APPLICABLE	<u>2.b. Average Power Range Monitor Flow Biased Neutron</u>
SAFETY ANALYSES,	<u>Flux-High</u> (continued)
LCO, and	
APPLICABILITY	THERMAL POWER and potentially exceeding the SL applicable to
	high pressure and core flow conditions (MCPR SL). During
	MODES 2 and 5, other IRM and APRM Functions provide
	protection for fuel cladding integrity.

#### 2.c. Average Power Range Monitor Fixed Neutron Flux-High

The APRM channels provide the primary indication of neutron flux within the core and respond almost instantaneously to neutron flux increases. The Average Power Range Monitor Fixed Neutron Flux—High Function is capable of generating a trip signal to prevent fuel damage or excessive Reactor Coolant System (RCS) pressure. For the overpressurization protection analysis of Reference 2, the Average Power Range Monitor Fixed Neutron Flux—High Function is assumed to terminate the main steam isolation valve (MSIV) closure event and, along with the safety valves, limits the peak reactor pressure vessel (RPV) pressure to less than the ASME Code limits. The control rod drop accident (CRDA) analysis (Ref. 7) takes credit for the Average Power Range Monitor Fixed Neutron Flux—High Function to terminate the CRDA.

The APRM System is divided into two groups of channels with three APRM channels inputting to each trip system. The system is designed to allow one channel in each trip system to be bypassed. Any one APRM channel in a trip system can cause the associated trip system to trip. Four channels of Average Power Range Monitor Fixed Neutron Flux—High with two channels in each trip system arranged in a one-out-oftwo logic are required to be OPERABLE to ensure that no single instrument failure will preclude a scram from this Function on a valid signal. In addition, to provide adequate coverage of the entire core, at least 50% of the LPRM inputs are required for each APRM channel, with at least two LPRM inputs from each of the four axial levels at which the LPRMs are located.

The Allowable Value is based on the Analytical Limit assumed in the CRDA analyses.

APPLICABLE

LCO. and

SAFETY ANALYSES. (continued)

The Average Power Range Monitor Fixed Neutron Flux-High APPLICABILITY Function is required to be OPERABLE in MODE 1 where the potential consequences of the analyzed transients could result in the SLs (e.g., MCPR and RCS pressure) being exceeded. Although the Average Power Range Monitor Fixed Neutron Flux-High Function is assumed in the CRDA analysis (Ref. 7), which is applicable in MODE 2, the Average Power Range Monitor Neutron Flux-High, Setdown Function conservatively bounds the assumed trip and, together with the assumed IRM trips. provides adequate protection. Therefore, the Average Power Range Monitor Fixed Neutron Flux-High Function is not required in MODE 2. 2.d. Average Power Range Monitor - Inop This signal provides assurance that a minimum number of APRMs are OPERABLE. For any APRM, anytime its APRM mode switch is moved to any position other than "Operate," an APRM module is unplugged, or the APRM has too few LPRM inputs (< 50%), an inoperative trip signal will be received by the RPS, unless the APRM is bypassed. Since only one APRM in each trip system may be bypassed, only one APRM in each trip system may be inoperable without resulting in an RPS trip signal. This Function was not specifically credited in the accident analysis, but it is retained for the overall redundancy and diversity of the RPS as required by the NRC approved licensing basis. Four channels of Average Power Range Monitor-Inop with two channels in each trip system are required to be OPERABLE to ensure that no single failure will preclude a scram from this Function on a valid signal. There is no Allowable Value for this Function. This Function is required to be OPERABLE in the MODES where the other APRM Functions are required. (continued) Revision 0 B 3.3.1.1-12 Dresden 2 and 3

2.c. Average Power Range Monitor Fixed Neutron Flux-High

## 3. Reactor Vessel Steam Dome Pressure - High

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

An increase in the RPV pressure during reactor operation compresses the steam voids and results in a positive reactivity insertion. This causes the neutron flux and THERMAL POWER transferred to the reactor coolant to increase, which could challenge the integrity of the fuel cladding and the RCPB. No specific safety analysis takes direct credit for this Function. However, the Reactor Vessel Steam Dome Pressure-High Function initiates a scram for transients that results in a pressure increase, counteracting the pressure increase by rapidly reducing core power. For the overpressurization protection analysis of Reference 2, reactor scram (the analyses conservatively assume scram on the Average Power Range Monitor Fixed Neutron Flux-High signal, not the Reactor Vessel Steam Dome Pressure-High or the Main Steam Isolation Valve-Closure signals), along with the safety valves, limits the peak RPV pressure to less than the ASME Section III Code limits.

High reactor pressure signals are initiated from four pressure switches that sense reactor pressure. The Reactor Vessel Steam Dome Pressure-High Allowable Value is chosen to provide a sufficient margin to the ASME Section III Code limits during the event.

Four channels of Reactor Vessel Steam Dome Pressure-High Function, with two channels in each trip system arranged in a one-out-of-two logic, are required to be OPERABLE to ensure that no single instrument failure will preclude a scram from this Function on a valid signal. The Function is required to be OPERABLE in MODES 1 and 2 when the RCS is pressurized and the potential for pressure increase exists.

## 4. Reactor Vessel Water Level-Low

Low RPV water level indicates the capability to cool the fuel may be threatened. Should RPV water level decrease too far, fuel damage could result. Therefore, a reactor scram is initiated at this level to substantially reduce the heat generated in the fuel from fission. The Reactor Vessel Water Level - Low Function is assumed in the analysis of the

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY	<u>4. Reactor Vessel Water Level-Low</u> (continued)
	recirculation line break (Ref. 8) and is credited in the loss of normal feedwater flow event (Ref. 9). The reactor scram reduces the amount of energy required to be absorbed and, along with the actions of the Emergency Core Cooling Systems (ECCS), ensures that the fuel peak cladding temperature remains below the limits of 10 CFR 50.46.
	Reactor Vessel Water Level - Low signals are initiated from four differential pressure transmitters that sense the difference between the pressure due to a constant column of water (reference leg) and the pressure due to the actual water level (variable leg) in the vessel.
	Four channels of Reactor Vessel Water Level-Low Function, with two channels in each trip system arranged in a one-out-of-two logic, are required to be OPERABLE to ensure that no single instrument failure will preclude a scram from this Function on a valid signal.
	The Reactor Vessel Water Level - Low Allowable Value is selected to ensure that during normal operation the separator skirts are not uncovered (this protects available recirculation pump net positive suction head (NPSH) from significant carryunder) and, for transients involving loss of all normal feedwater flow, initiation of the low pressur ECCS subsystems at Reactor Vessel Water - Low Low will not be required.
	The Function is required in MODES 1 and 2 where considerabl energy exists in the RCS resulting in the limiting transients and accidents. ECCS initiations at Reactor Vessel Water Level-Low Low provide sufficient protection for level transients in all other MODES.
	<u>5. Main Steam Isolation Valve-Closure</u>
	MSIV closure results in loss of the main turbine and the condenser as a heat sink for the nuclear steam supply syste and indicates a need to shut down the reactor to reduce hea generation. Therefore, a reactor scram is initiated on a
	(continued

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY	5. Main Steam Isolation Valve-Closure (continued)
	Main Steam Isolation Valve-Closure signal before the MSIVs are completely closed in anticipation of the complete loss of the normal heat sink and subsequent overpressurization transient. However, for the overpressurization protection analysis of Reference 2, the Average Power Range Monitor Fixed Neutron Flux-High Function, along with the safety valves, limits the peak RPV pressure to less than the ASME Code limits. That is, the direct scram on position switches for MSIV closure events is not assumed in the overpressurization analysis. Additionally, MSIV closure is assumed in the transients analyzed in Reference 4 (e.g., low steam line pressure, manual closure of MSIVs, high steam line flow).
	The reactor scram reduces the amount of energy required to be absorbed and, along with the actions of the ECCS, ensures that the fuel peak cladding temperature remains below the limits of 10 CFR 50.46.
	MSIV closure signals are initiated from position switches located on each of the eight MSIVs. Each MSIV has two position switches; one inputs to RPS trip system A while the other inputs to RPS trip system B. Thus, each RPS trip system receives an input from eight Main Steam Isolation Valve-Closure channels, each consisting of one position switch. The logic for the Main Steam Isolation Valve-Closure Function is arranged such that either the inboard or outboard valve on three or more of the main steam lines must close in order for a scram to occur. In addition, certain combinations of valves closed in two lines will result in a half-scram.
	The Main Steam Isolation Valve-Closure Allowable Value is specified to ensure that a scram occurs prior to a significant reduction in steam flow, thereby reducing the severity of the subsequent pressure transient.
	Sixteen channels of the Main Steam Isolation Valve-Closure Function, with eight channels in each trip system, are required to be OPERABLE to ensure that no single instrument failure will preclude the scram from this Function on a
	(continued)

APPLICABLE SAFETY ANALYSES,	5. Main Steam Isolation Valve-Closure (continued)
APPLICABILITY	valid signal. This Function is required in MODE 1 and MODE 2 with reactor pressure greater than or equal to 600 psig since, with the MSIVs open and the heat generation rate high, a pressurization transient can occur if the MSIVs close. In MODE 2 and reactor pressure less than 600 psig, the heat generation rate is low enough so that the other diverse RPS functions provide sufficient protection. This Function is automatically bypassed with the reactor mode switch in any position other than run and reactor pressure
	is less than 600 psig.

## 6. Drywell Pressure-High

High pressure in the drywell could indicate a break in the RCPB. A reactor scram is initiated to minimize the possibility of fuel damage and to reduce the amount of energy being added to the coolant and the drywell. The Drywell Pressure-High Function is assumed to scram the reactor for LOCAs inside the primary containment.

The reactor scram reduces the amount of energy required to be absorbed and, along with the actions of the ECCS, ensures that the fuel peak cladding temperature remains below the limits of 10 CFR 50.46.

High drywell pressure signals are initiated from four pressure switches that sense drywell pressure. The Allowable Value was selected to be as low as possible and indicative of a LOCA inside primary containment.

Four channels of Drywell Pressure-High Function, with two channels in each trip system arranged in a one-out-of-two logic, are required to be OPERABLE to ensure that no single instrument failure will preclude a scram from this Function on a valid signal. The Function is required in MODES 1 and 2 where considerable energy exists in the RCS, resulting in the limiting transients and accidents.

#### 7.a, 7.b. Scram Discharge Volume Water Level-High

SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

APPLICABLE

The SDV receives the water displaced by the motion of the CRD pistons during a reactor scram. Should this volume fill to a point where there is insufficient volume to accept the displaced water, control rod insertion would be hindered. Therefore, a reactor scram is initiated while the remaining free volume is still sufficient to accommodate the water from a full core scram. The types of Scram Discharge Volume Water Level - High Functions are an input to the RPS logic. No credit is taken for a scram initiated from these Functions for any of the design basis accidents or transients analyzed in the UFSAR. However, they are retained to ensure the RPS remains OPERABLE.

SDV water level is measured by two diverse methods. The level in each of the two SDVs is measured by two differential pressure type level transmitters with non-indicating electronic trip units. In addition, Unit 2 uses two thermal probes and Unit 3 uses 2 non-indicating float type level switches for a total of eight level signals. The outputs of these devices are arranged so that there is a signal from a differential pressure level transmitter and either a thermal probe or a float switch to each RPS logic channel. The level measurement instrumentation satisfies the recommendations of Reference 10.

The Allowable Value is chosen low enough to ensure that there is sufficient volume in the SDV to accommodate the water from a full scram.

Four channels of each type of Scram Discharge Volume Water Level - High Function, with two channels of each type in each trip system, are required to be OPERABLE to ensure that no single instrument failure will preclude a scram from these Functions on a valid signal. These Functions are required in MODES 1 and 2, and in MODE 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies, since these are the MODES and other specified conditions when control rods are withdrawn. At all other times, this Function may be bypassed.

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

### 8. Turbine Stop Valve-Closure

Closure of the TSVs results in the loss of a heat sink that produces reactor pressure, neutron flux, and heat flux transients that must be limited. Therefore, a reactor scram is initiated at the start of TSV closure in anticipation of the transients that would result from the closure of these valves. The Turbine Stop Valve-Closure Function is the primary scram signal for the turbine trip event analyzed in Reference 11. For this event, the reactor scram reduces the amount of energy required to be absorbed and ensures that the MCPR SL is not exceeded.

Turbine Stop Valve-Closure signals are initiated from position switches located on each of the four TSVs. A position switch and two independent contacts are associated with each stop valve. One of the two contacts provides input to RPS trip system A; the other, to RPS trip system B. Thus, each RPS trip system receives an input from four Turbine Stop Valve-Closure channels, each consisting of one position switch (which is common to a channel in the other RPS trip system) and a switch contact. The logic for the Turbine Stop Valve-Closure Function is such that three or more TSVs must be closed to produce a scram. This Function must be enabled at THERMAL POWER > 45% RTP. This is normally accomplished automatically by pressure switches sensing turbine first stage pressure; therefore, opening the turbine bypass valves may affect the OPERABILITY of this Function.

The Turbine Stop Valve-Closure Allowable Value is selected to be high enough to detect imminent TSV closure, thereby reducing the severity of the subsequent pressure transient.

Eight channels of Turbine Stop Valve-Closure Function, with four channels in each trip system, are required to be OPERABLE to ensure that no single instrument failure will preclude a scram from this Function even if one TSV should fail to close. This Function is required, consistent with analysis assumptions, whenever THERMAL POWER is  $\geq$  45% RTP. This Function is not required when THERMAL POWER is < 45% RTP since the Reactor Vessel Steam Dome Pressure-High and the Average Power Range Monitor Fixed Neutron Flux-High Functions are adequate to maintain the necessary safety margins.

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)	<u>9. Turbine Control Valve Fast Closure, Trip Oil</u> <u>Pressure-Low</u>
	Fast closure of the TCVs results in the loss of a heat sink that produces reactor pressure, neutron flux, and heat flux transients that must be limited. Therefore, a reactor scram is initiated on TCV fast closure in anticipation of the transients that would result from the closure of these valves. The Turbine Control Valve Fast Closure, Trip Oil Pressure-Low Function is the primary scram signal for the generator load rejection event analyzed in Reference 12. For this event, the reactor scram reduces the amount of energy required to be absorbed and ensures that the MCPR SL is not exceeded.
	Turbine Control Valve Fast Closure, Trip Oil Pressure-Low signals are initiated by the electrohydraulic control (EHC) fluid pressure at each control valve. One pressure switch is associated with each control valve, and the signal from each switch is assigned to a separate RPS logic channel. This Function must be enabled at THERMAL POWER $\geq$ 45% RTP. This is normally accomplished automatically by pressure switches sensing turbine first stage pressure; therefore, opening the turbine bypass valves may affect the OPERABILITY of this Function.
	The Turbine Control Valve Fast Closure, Trip Oil Pressure-Low Allowable Value is selected high enough to detect imminent TCV fast closure.
	Four channels of Turbine Control Valve Fast Closure, Trip Oil Pressure-Low Function with two channels in each trip system arranged in a one-out-of-two logic are required to be OPERABLE to ensure that no single instrument failure will preclude a scram from this Function on a valid signal. This Function is required, consistent with the analysis assumptions, whenever THERMAL POWER is $\geq$ 45% RTP. This Function is not required when THERMAL POWER is < 45% RTP, since the Reactor Vessel Steam Dome Pressure-High and the Average Power Range Monitor Fixed Neutron Flux-High Function are adaquate to maintain the pressure safety

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margins.

Functions are adequate to maintain the necessary safety

#### 10. Turbine Condenser Vacuum-Low

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

The Turbine Condenser Vacuum - Low Function is provided to shut down the reactor and reduce the energy input to the main condenser to help prevent overpressurization of the main condenser in the event of a loss of the main condenser vacuum. The Turbine Condenser Vacuum - Low Function is the primary scram signal for the loss of condenser vacuum event analyzed in Reference 9. For this event, the reactor scram reduces the amount of energy required to be absorbed by the main condenser and helps to ensure the MCPR SL is not exceeded by reducing the core energy prior to the fast closure of the turbine stop valves. This Function helps maintain the main condenser as a heat sink during this event.

Turbine condenser vacuum pressure signals are derived from four pressure switches that sense the pressure in the condenser. The Allowable Value was selected to reduce the severity of a loss of main condenser vacuum event by anticipating the transient and scramming the reactor at a higher vacuum than the setpoints that close the turbine stop valves and bypass valves.

Four channels of Turbine Condenser Vacuum-Low Function, with two channels in each trip system arranged in a one-outof-two logic, are required to be OPERABLE to ensure that no single instrument failure will preclude a scram from this Function on a valid signal. The Function is required in MODE 1 and MODE 2 when reactor pressure is  $\geq$  600 psig since, in these MODES, a significant amount of core energy can be rejected to the main condenser. During MODE 2 with reactor pressure < 600 psig, and MODES 3, 4, and 5, the core energy is significantly lower. This Function is automatically bypassed with the reactor mode switch in any position other than run and reactor pressure is < 600 psig.

# 11. Reactor Mode Switch - Shutdown Position

The Reactor Mode Switch - Shutdown Position Function provides signals, via the two manual scram logic channels (A3 and B3), which are redundant to the automatic protective instrumentation channels and provide manual reactor trip

(continued)

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY	<u>11. Reactor Mode Switch-Shutdown Position</u> (continued)
	capability. This Function was not specifically credited in the accident analysis, but it is retained for the overall redundancy and diversity of the RPS as required by the NRC approved licensing basis.
	The reactor mode switch is a single switch with two channels, each of which provides input into one of the two manual scram RPS logic channels.
	There is no Allowable Value for this Function, since the channels are mechanically actuated based solely on reactor mode switch position.
	Two channels of Reactor Mode Switch-Shutdown Position Function, with one channel in each manual trip system, are available and required to be OPERABLE. The Reactor Mode Switch-Shutdown Position Function is required to be OPERABLE in MODES 1 and 2, and MODE 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies, since these are the MODES and other specified conditions when control rods are withdrawn.
	<u>12. Manual_Scram</u>
	The Manual Scram push button channels provide signals, via the two manual scram logic channels (A3 and B3), which are redundant to the automatic protective instrumentation channels and provide manual reactor trip capability. This Function was not specifically credited in the accident analysis but it is retained for the overall redundancy and

There is one Manual Scram push button channel for each of the two manual scram RPS logic channels. In order to cause a scram it is necessary that both channels be actuated.

There is no Allowable Value for this Function since the channels are mechanically actuated based solely on the position of the push buttons.

diversity of the RPS as required by the NRC approved

licensing basis.

APPLICABLE	<u>12. Manual Scram</u> (continued)
SAFETY ANALYSES, LCO, and APPLICABILITY	Two channels of Manual Scram with one channel in each manual trip system are available and required to be OPERABLE in MODES 1 and 2, and in MODE 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies, since these are the MODES and other specified conditions when control rods are withdrawn.

Note 1 has been provided to modify the ACTIONS related to ACTIONS RPS instrumentation channels. Section 1.3, Completion Times, specifies that once a Condition has been entered. subsequent divisions, subsystems, components, or variables expressed in the Condition, discovered to be inoperable or not within limits, will not result in separate entry into the Condition. Section 1.3 also specifies that Required Actions of the Condition continue to apply for each additional failure, with Completion Times based on initial entry into the Condition. However, the Required Actions for inoperable RPS instrumentation channels provide appropriate compensatory measures for separate inoperable channels. As such, a Note has been provided that allows separate Condition entry for each inoperable RPS instrumentation channel.

> Note 2 has been provided to modify the ACTIONS for the RPS instrumentation functions of APRM Flow Biased Neutron Flux-High (Function 2.b) and APRM Fixed Neutron Flux-High (Function 2.c) when they are inoperable due to failure of SR 3.3.1.1.2 and gain adjustments are necessary. Note 2 allows entry into associated Conditions and Required Actions to be delayed for up to 2 hours if the APRM is indicating a lower power value than the calculated power (i.e., the gain adjustment factor (GAF) is high (non-conservative)), and for up to 12 hours if the APRM is indicating a higher power value than the calculated power (i.e., the GAF is low (conservative)). The GAF for any channel is defined as the power value determined by the heat balance divided by the APRM reading for that channel. Upon completion of the gain adjustment, or expiration of the allowed time, the channel must be returned to OPERABLE status or the applicable Condition entered and the Required Actions taken. This Note is based on the time required to perform gain adjustments on multiple channels and additional time is allowed when the GAF is out of limits but conservative.

> > (continued)

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ACTIONS

(continued)

## A.1 and A.2

Because of the diversity of sensors available to provide trip signals and the redundancy of the RPS design. an allowable out of service time of 12 hours has been shown to be acceptable (Ref. 13) to permit restoration of any inoperable required channel to OPERABLE status. However. this out of service time is only acceptable provided the associated Function's inoperable channel is in one trip system and the Function still maintains RPS trip capability (refer to Required Actions B.1, B.2, and C.1 Bases). If the inoperable channel cannot be restored to OPERABLE status within the allowable out of service time, the channel or the associated trip system must be placed in the tripped condition per Required Actions A.1 and A.2. Placing the inoperable channel in trip (or the associated trip system in trip) would conservatively compensate for the inoperability, restore capability to accommodate a single failure, and allow operation to continue. Alternatively, if it is not desired to place the channel (or trip system) in trip (e.g., as in the case where placing the inoperable channel in trip would result in a scram), Condition D must be entered and its Required Action taken. The 12 hour allowance is not allowed for Reactor Mode Switch-Shutdown Position and Manual Scram Function channels since with one channel inoperable RPS trip capability is not maintained. In this case. Condition C must be entered and its Required Actions taken.

# B.1 and B.2

Condition B exists when, for any one or more Functions, at least one required channel is inoperable in each trip system. In this condition, provided at least one channel per trip system is OPERABLE, the RPS still maintains trip capability for that Function, but cannot accommodate a single failure in either trip system.

Required Actions B.1 and B.2 limit the time the RPS scram logic, for any Function, would not accommodate single failure in both trip systems (e.g., one-out-of-one and one-out-of-one arrangement for a typical four channel

## ACTIONS <u>B.1 and B.2</u> (continued)

Function). The reduced reliability of this logic arrangement was not evaluated in Reference 13 for the 12 hour Completion Time. Within the 6 hour allowance, the associated Function will have all required channels OPERABLE or in trip (or any combination) in one trip system.

Completing one of these Required Actions restores RPS to a reliability level equivalent to that evaluated in Reference 13. which justified a 12 hour allowable out of service time as presented in Condition A. The trip system in the more degraded state should be placed in trip or, alternatively, all the inoperable channels in that trip system should be placed in trip (e.g., a trip system with two inoperable channels could be in a more degraded state than a trip system with four inoperable channels if the two inoperable channels are in the same Function while the four inoperable channels are all in different Functions). The decision of which trip system is in the more degraded state should be based on prudent judgment and take into account current plant conditions (i.e., what MODE the plant is in). If this action would result in a scram or RPT, it is permissible to place the other trip system or its inoperable channels in trip.

The 6 hour Completion Time is judged acceptable based on the remaining capability to trip, the diversity of the sensors available to provide the trip signals, the low probability of extensive numbers of inoperabilities affecting all diverse Functions, and the low probability of an event requiring the initiation of a scram.

Alternately, if it is not desired to place the inoperable channels (or one trip system) in trip (e.g., as in the case where placing the inoperable channel or associated trip system in trip would result in a scram or RPT), Condition D must be entered and its Required Action taken. The 6 hour allowance is not allowed for Reactor Mode Switch-Shutdown and Manual Scram Function channels since with two channels inoperable RPS trip capability is not maintained. In this case, Condition C must be entered and its Required Action taken.

ACTIONS (continued)

<u>C.1</u>

Required Action C.1 is intended to ensure that appropriate actions are taken if multiple, inoperable, untripped channels within the same trip system for the same Function result in the Function not maintaining RPS trip capability. A Function is considered to be maintaining RPS trip capability when sufficient channels are OPERABLE or in trip (or the associated trip system is in trip), such that both trip systems will generate a trip signal from the given Function on a valid signal. For the typical Function with one-out-of-two taken twice logic and the IRM and APRM Functions, this would require both trip systems to have one channel OPERABLE or in trip (or the associated trip system in trip). For Function 5 (Main Steam Isolation Valve-Closure), this would require both trip systems to have each channel associated with the MSIVs in three main steam lines (not necessarily the same main steam lines for both trip systems) OPERABLE or in trip (or the associated trip system in trip). For Function 8 (Turbine Stop Valve-Closure), this would require both trip systems to have three channels, each OPERABLE or in trip (or the associated trip system in trip).

The Completion Time is intended to allow the operator time to evaluate and repair any discovered inoperabilities. The 1 hour Completion Time is acceptable because it minimizes risk while allowing time for restoration or tripping of channels.

<u>D.1</u>

Required Action D.1 directs entry into the appropriate Condition referenced in Table 3.3.1.1-1. The applicable Condition specified in the Table is Function and MODE or other specified condition dependent and may change as the Required Action of a previous Condition is completed. Each time an inoperable channel has not met any Required Action of Condition A, B, or C and the associated Completion Time has expired, Condition D will be entered for that channel and provides for transfer to the appropriate subsequent Condition.

ACTIONS (continued) E.1, F.1, and G.1

If the channel(s) is not restored to OPERABLE status or placed in trip (or the associated trip system placed in trip) within the allowed Completion Time, the plant must be placed in a MODE or other specified condition in which the LCO does not apply. The allowed Completion Times are reasonable, based on operating experience, to reach the specified condition from full power conditions in an orderly manner and without challenging plant systems. In addition, the Completion Time of Required Action E.1 is consistent with the Completion Time provided in LCO 3.2.2, "MINIMUM CRITICAL POWER RATIO (MCPR)."

<u>H.1</u>

If the channel(s) is not restored to OPERABLE status or placed in trip (or the associated trip system placed in trip) within the allowed Completion Time, the plant must be placed in a MODE or other specified condition in which the LCO does not apply. This is done by immediately initiating action to fully insert all insertable control rods in core cells containing one or more fuel assemblies. Control rods in core cells containing no fuel assemblies do not affect the reactivity of the core and are, therefore, not required to be inserted. Action must continue until all insertable control rods in core cells containing one or more fuel assemblies are fully inserted.

SURVEILLANCE As noted at the beginning of the SRs, the SRs for each RPS REQUIREMENTS instrumentation Function are located in the SRs column of Table 3.3.1.1-1.

> The Surveillances are modified by a Note to indicate that when a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours, provided the associated Function maintains RPS trip capability. Upon completion of the Surveillance, or expiration of the 6 hour allowance, the channel must be returned to OPERABLE status or the applicable Condition entered and Required Actions taken. This Note is based on the reliability analysis (Ref. 13) assumption of the average

> > (continued)

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SURVEILLANCE time required to perform channel Surveillance. That REQUIREMENTS (continued) to perform channel Surveillance. That analysis demonstrated that the 6 hour testing allowance does not significantly reduce the probability that the RPS will trip when necessary.

## <u>SR 3.3.1.1.1</u>

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

Agreement criteria are determined by the plant 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 instrument has drifted outside its limit.

The Frequency is based upon 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 channels required by the LCO.

# <u>SR\_3.3.1.1.2</u>

To ensure that the APRMs are accurately indicating the true core average power, the APRMs are calibrated to the reactor power calculated from a heat balance. LCO 3.2.4, "Average Power Range Monitor (APRM) Gain and Setpoint," allows the APRMs to be reading greater than actual THERMAL POWER to compensate for localized power peaking. When this adjustment is made, the requirement for the APRMs to indicate within 2% RTP of calculated power is modified to

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REQUIREMENTS

## SURVEILLANCE <u>SR 3.3.1.1.2</u> (continued)

require the APRMs to indicate within 2% RTP of the calculated value established by SR 3.2.4.2. The Frequency of once per 7 days is based on minor changes in LPRM sensitivity, which could affect the APRM reading between performances of SR 3.3.1.1.9.

An allowance is provided that requires the SR to be performed only at  $\geq 25\%$  RTP because it is difficult to accurately maintain APRM indication of core THERMAL POWER consistent with a heat balance when < 25\% RTP. At low power levels, a high degree of accuracy is unnecessary because of the large, inherent margin to thermal limits (MCPR, APLHGR, and LHGR). At  $\geq 25\%$  RTP, the Surveillance is required to have been satisfactorily performed within the last 7 days, in accordance with SR 3.0.2. A Note is provided which allows an increase in THERMAL POWER above 25\% if the 7 day Frequency is not met per SR 3.0.2. In this event, the SR must be performed within 12 hours after reaching or exceeding 25% RTP. Twelve hours is based on operating experience and in consideration of providing a reasonable time in which to complete the SR.

# <u>SR 3.3.1.1.3</u>

The Average Power Range Monitor Flow Biased Neutron Flux-High Function uses the recirculation loop drive flows to vary the trip setpoint. This SR ensures that the total loop drive flow signals from the flow converters used to vary the setpoint is appropriately compared to a calibrated flow signal and, therefore, the APRM Function accurately reflects the required setpoint as a function of flow. Each flow signal from the respective flow converter must be  $\leq 100\%$  of the calibrated flow signal. If the flow converter signal is not within the limit, all required APRMs that receive an input from the inoperable flow converter must be declared inoperable.

The Frequency of 7 days is based on engineering judgment, operating experience, and the reliability of this instrumentation.

SURVEILLANCE REQUIREMENTS (continued)

## SR 3.3.1.1.4 and SR 3.3.1.1.8

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the channel will perform the intended function. A successful test of the required contact(s) of a channel relay may be performed by the verification of the change of state of a single contact of the relay. This clarifies what is an acceptable CHANNEL FUNCTIONAL TEST of a relay. This is acceptable because all of the other required contacts of the relay are verified by other Technical Specifications and non-Technical Specifications tests at least once per refueling interval with applicable extensions. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology.

As noted, SR 3.3.1.1.4 is not required to be performed when entering MODE 2 from MODE 1, since testing of the MODE 2 required IRM and APRM Functions cannot be performed in MODE 1 without utilizing jumpers, lifted leads, or movable links. This allows entry into MODE 2 if the 7 day Frequency is not met per SR 3.0.2. In this event, the SR must be performed within 24 hours after entering MODE 2 from MODE 1. Twenty four hours is based on operating experience and in consideration of providing a reasonable time in which to complete the SR.

A Frequency of 7 days for SR 3.3.1.1.4 provides an acceptable level of system average unavailability over the Frequency interval and is based on reliability analysis (Ref. 13). The Frequency of 31 days for SR 3.3.1.1.8 is acceptable based on engineering judgment, operating experience, and the reliability of this instrumentation.

## SR 3.3.1.1.5

A functional test of each automatic scram contactor is performed to ensure that each automatic RPS logic channel will perform the intended function. There are four RPS channel test switches, one associated with each of the four automatic trip channels (A1, A2, B1, and B2). These test switches allow the operator to test the OPERABILITY of the individual trip logic channel automatic scram contactors as

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SURVEILLANCE REQUIREMENTS <u>SR 3.3.1.1.5</u> (continued)

an alternative to using an automatic scram function trip. This is accomplished by placing the RPS channel test switch in the test position, which will input a trip signal into the associated RPS logic channel. The RPS channel test switches are not specifically credited in the accident analysis. The Manual Scram Functions are not configured the same as the generic model used in Reference 13. However. Reference 13 concluded that the Surveillance Frequency extensions for RPS Functions were not affected by the difference in configuration since each automatic RPS logic channel has a test switch which is functionally the same as the manual scram switches in the generic model. As such. a functional test of each RPS automatic scram contactor using either its associated test switch or by test of any of the associated automatic RPS Functions is required to be performed once every 7 days. The Frequency of 7 days is based on the reliability analysis of Reference 13.

# SR 3.3.1.1.6 and SR 3.3.1.1.7

These Surveillances are established to ensure that no gaps in neutron flux indication exist from subcritical to power operation for monitoring core reactivity status.

The overlap between SRMs and IRMs is required to be demonstrated to ensure that reactor power will not be increased into a neutron flux region without adequate indication. This is required prior to fully withdrawing SRMs since indication is being transitioned from the SRMs to the IRMs.

The overlap between IRMs and APRMs is of concern when reducing power into the IRM range. On power increases, the system design will prevent further increases (by initiating a rod block) if adequate overlap is not maintained. The IRM/APRM and SRM/IRM overlaps are acceptable if a ½ decade overlap exists.

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BASES

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SURVEILLANCE REQUIREMENTS <u>SR 3.3.1.1.10, SR 3.3.1.1.13, SR 3.3.1.1.15, and</u> <u>SR 3.3.1.1.17</u> (continued)

compensated for by performing the 7 day calorimetric calibration (SR 3.3.1.1.2) and the 2000 EFPH LPRM calibration against the TIPs (SR 3.3.1.1.9). A second Note is provided that requires the APRM and IRM SRs to be performed within 24 hours of entering MODE 2 from MODE 1. Testing of the MODE 2 APRM and IRM Functions cannot be performed in MODE 1 without utilizing jumpers, lifted leads, or movable links. This Note allows entry into MODE 2 from MODE 1 if the associated Frequency is not met per SR 3.0.2. Twenty four hours is based on operating experience and in consideration of providing a reasonable time in which to complete the SR. Note 3 to SR 3.3.1.1.15 states that for Function 2.b. this SR is not required for the flow portion of these channels. This allowance is consistent with the plant specific setpoint methodology. This portion of the Function 2.b channels must be calibrated in accordance with SR 3.3.1.1.17.

The Frequency of SR 3.3.1.1.10 is based upon the assumption of a 31 day calibration interval in determination of the magnitude of equipment drift in the setpoint analysis. The Frequency of SR 3.3.1.1.13 is based upon the assumption of a 92 day calibration interval in determination of the magnitude of equipment drift in the setpoint analysis. The Frequency of SR 3.3.1.1.15 is based upon the assumption of a 184 day calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis. The Frequency of SR 3.3.1.1.17 is based upon the assumption of an 24 month calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis.

# SR 3.3.1.1.11 and SR 3.3.1.1.16

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the channel will perform the intended function. A successful test of the required contact(s) of a channel relay may be performed by the verification of the change of state of a single contact of the relay. This clarifies what is an acceptable CHANNEL FUNCTIONAL TEST of a relay. This is acceptable because all of the other required contacts of the relay are verified by other Technical

(continued)

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REOUIREMENTS

SURVEILLANCE SR 3.3.1.1.11 and SR 3.3.1.1.16 (continued)

Specifications and non-Technical Specifications tests at least once per refueling interval with applicable extensions. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology.

The 92 day Frequency of SR 3.3.1.1.11 is based on the reliability analysis of Reference 13. The 24 month Frequency of SR 3.3.1.1.16 is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown that these components usually pass the Surveillance when performed at the 24 month Frequency.

## <u>SR 3.3.1.1.12</u>

Calibration of trip units provides a check of the actual trip setpoints. The channel must be declared inoperable if the trip setting is discovered to be less conservative than the Allowable Value specified in Table 3.3.1.1-1. If the trip setting is discovered to be less conservative than accounted for in the appropriate setpoint methodology, but is not beyond the Allowable Value, the channel performance is still within the requirements of the plant safety analysis. Under these conditions, the setpoint must be readjusted to be equal to or more conservative than accounted for in the appropriate setpoint methodology.

The Frequency of 92 days is based on the reliability analysis of Reference 13.

#### <u>SR 3.3.1.1.14</u>

This SR ensures that scrams initiated from the Turbine Stop Valve-Closure and Turbine Control Valve Fast Closure, Trip Oil Pressure-Low Functions will not be inadvertently bypassed when THERMAL POWER is  $\geq$  45% RTP. This involves calibration of the bypass channels. Adequate margins for

#### SR 3.3.1.1.14 (continued) SURVEILLANCE

REQUIREMENTS

the instrument setpoint methodologies are incorporated into the Allowable Value and the actual setpoint. Because main turbine bypass flow can affect this setpoint nonconservatively (THERMAL POWER is derived from turbine first stage pressure), the main turbine bypass valves must remain closed during an in-service calibration at THERMAL POWER  $\geq$  45% RTP, if performing the calibration using actual turbine first stage pressure, to ensure that the calibration remains valid

If any bypass channels setpoint is nonconservative (i.e., the Functions are bypassed at  $\geq$  45% RTP, either due to open main turbine bypass valve(s) or other reasons). then the affected Turbine Stop Valve-Closure and Turbine Control Valve Fast Closure. Trip Oil Pressure - Low Functions are considered inoperable. Alternatively, the bypass channel can be placed in the conservative condition (nonbypass). If placed in the nonbypass condition. this SR is met and the channel is considered OPERABLE.

The Frequency of 92 days is based on engineering judgment and reliability of the components.

## SR 3.3.1.1.18

The LOGIC SYSTEM FUNCTIONAL TEST (LSFT) demonstrates the OPERABILITY of the required trip logic for a specific channel. The functional testing of control rods (LCO 3.1.3, "Control Rod Operability"), and SDV vent and drain valves (LCO 3.1.8, "Scram Discharge Volume (SDV) Vent and Drain Valves"), overlaps this Surveillance to provide complete testing of the assumed safety function.

The 24 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown that these components usually pass the Surveillance when performed at the 24 month Frequency.

BASES	
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SURVEILLANCE REQUIREMENTS (continued)	<u>SR 3.3.1.1.19</u>
	This SR ensures that the individual channel response times are less than or equal to the maximum values assumed in the accident analysis. This test may be performed in one measurement or in overlapping segments, with verification that all components are tested. The RPS RESPONSE TIME acceptance criteria are included in Reference 14.
	As noted (Note 1), neutron detectors are excluded from RPS RESPONSE TIME testing because the principles of detector operation virtually ensure an instantaneous response time.
	RPS RESPONSE TIME tests are conducted on a 24 month STAGGERED TEST BASIS. Note 2 requires STAGGERED TEST BASIS Frequency to be determined based on 4 channels per trip system, in lieu of the 8 channels specified in Table 3.3.1.1-1 for the MSIV Closure Function. This Frequency is based on the logic interrelationships of the various channels required to produce an RPS scram signal. The 24 month Frequency is consistent with the typical industry refueling cycle and is based upon plant operating experience, which shows that random failures of instrumentation components causing serious response time degradation, but not channel failure, are infrequent occurrences.
REFERENCES	1. UFSAR, Section 7.2.
	2. UFSAR, Section 5.2.2.2.3.
	3. UFSAR, Section 6.2.1.3.2.
	4. UFSAR, Chapter 15.
	5. UFSAR, Section 15.4.1.
	<ol> <li>NED0-23842, "Continuous Control Rod Withdrawal in the Startup Range," April 18, 1978.</li> </ol>
	7. UFSAR, Section 15.4.10.
	8. UFSAR, Section 15.6.5.
	(continued

REFERENCES (continued)	9.	UFSAR, Section 15.2.5.
	10.	P. Check (NRC) letter to G. Lainas (NRC), "BWR Scram Discharge System Safety Evaluation," December 1, 1980.
	11.	UFSAR, Section 15.2.3.
	12.	UFSAR, Section 15.2.2.
	13.	NEDC-30851-P-A , "Technical Specification Improvement Analyses for BWR Reactor Protection System," March 1988.
	14.	Technical Requirements Manual.

### B 3.3 INSTRUMENTATION

B 3.3.1.2 Source Range Monitor (SRM) Instrumentation

BASES

BACKGROUND	The SRMs provide the operator with information relative to the neutron flux level at very low flux levels in the core. As such, the SRM indication is used by the operator to monitor the approach to criticality and determine when criticality is achieved. The SRMs are not fully withdrawn until the count rate is greater than a minimum allowed count rate (a control rod block is set at this condition). After SRM to intermediate range monitor (IRM) overlap is demonstrated (as required by SR 3.3.1.1.6), the SRMs are normally fully withdrawn from the core.
	The SRM subsystem of the Neutron Monitoring System (NMS) consists of four channels. Each of the SRM channels can be bypassed, but only one at any given time, by the operation of a bypass switch. Each channel includes one detector that can be physically positioned in the core. Each detector assembly consists of a miniature fission chamber with associated cabling, signal conditioning equipment, and electronics associated with the various SRM functions. The signal conditioning equipment converts the current pulses from the fission chamber to analog DC currents that correspond to the count rate. Each channel also includes indication, alarm, and control rod blocks. However, this LCO specifies OPERABILITY requirements only for the monitoring and indication functions of the SRMs.
	During refueling, shutdown, and low power operations, the primary indication of neutron flux levels is provided by the SRMs or special movable detectors connected to the normal SRM circuits. The SRMs provide monitoring of reactivity changes during fuel or control rod movement and give the control room operator early indication of unexpected subcritical multiplication that could be indicative of an approach to criticality.
APPLICABLE SAFETY ANALYSES	Prevention and mitigation of prompt reactivity excursions during refueling and low power operation is provided by LCO 3.9.1, "Refueling Equipment Interlocks"; LCO 3.1.1, "SHUTDOWN MARGIN (SDM)"; LCO 3.3.1.1, "Reactor Protection

(continued)

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APPLICABLE SAFETY ANALYSES (continued)
Setdown Functions; and LCO 3.3.2.1, "Control Rod Block Instrumentation."
The SRMs have no safety function and are not assumed to function during any UFSAR design basis accident or transient analysis. However, the SRMs provide the only on scale monitoring of neutron flux levels during startup and refueling. Therefore, they are being retained in Technical Specifications.

> During startup in MODE 2, three of the four SRM channels are required to be OPERABLE to monitor the reactor flux level prior to and during control rod withdrawal, subcritical multiplication and reactor criticality, and neutron flux level and reactor period until the flux level is sufficient to maintain the IRM on Range 3 or above. All but one of the channels are required in order to provide a representation of the overall core response during those periods when reactivity changes are occurring throughout the core.

> > In MODES 3 and 4, with the reactor shut down, two SRM channels provide redundant monitoring of flux levels in the core.

In MODE 5, during a spiral offload or reload, an SRM outside the fueled region will no longer be required to be OPERABLE, since it is not capable of monitoring neutron flux in the fueled region of the core. Thus, CORE ALTERATIONS are allowed in a quadrant with no OPERABLE SRM in an adjacent quadrant provided the Table 3.3.1.2-1, footnote (b), requirement that the bundles being spiral reloaded or spiral offloaded are all in a single fueled region containing at least one OPERABLE SRM is met. Spiral reloading and offloading encompass reloading or offloading a cell on the edge of a continuous fueled region (the cell can be reloaded or offloaded in any sequence).

In nonspiral routine operations, two SRMs are required to be OPERABLE to provide redundant monitoring of reactivity changes occurring in the reactor core. Because of the local nature of reactivity changes during refueling, adequate

(continued)

monitoring and the SRMs are not required.

## ACTIONS <u>A.1 and B.1</u>

In MODE 2, with the IRMs on Range 2 or below, SRMs provide the means of monitoring core reactivity and criticality. With any number of the required SRMs inoperable, the ability to monitor neutron flux is degraded. Therefore, a limited time is allowed to restore the inoperable channels to OPERABLE status.

(continued)

Dresden 2 and 3

BASES

#### ACTIONS <u>A.1 and B.1</u> (continued)

Provided at least one SRM remains OPERABLE, Required Action A.1 allows 4 hours to restore the required SRMs to OPERABLE status. This time is reasonable because there is adequate capability remaining to monitor the core, there is limited risk of an event during this time, and there is sufficient time to take corrective actions to restore the required SRMs to OPERABLE status or to establish alternate IRM monitoring capability. During this time, control rod withdrawal and power increase is not precluded by this Required Action. Having the ability to monitor the core with at least one SRM, proceeding to IRM Range 3 or greater (with overlap required by SR 3.3.1.1.6), and thereby exiting the Applicability of this LCO, is acceptable for ensuring adequate core monitoring and allowing continued operation.

With three required SRMs inoperable, Required Action B.1 allows no positive changes in reactivity (control rod withdrawal must be immediately suspended) due to inability to monitor the changes. Required Action A.1 still applies and allows 4 hours to restore monitoring capability prior to requiring control rod insertion. This allowance is based on the limited risk of an event during this time, provided that no control rod withdrawals are allowed, and the desire to concentrate efforts on repair, rather than to immediately shut down, with no SRMs OPERABLE.

## <u>C.1</u>

In MODE 2 with the IRMs on Range 2 or below, if the required number of SRMs is not restored to OPERABLE status within the allowed Completion Time, the reactor shall be placed in MODE 3. With all control rods fully inserted, the core is in its least reactive state with the most margin to criticality. The allowed Completion Time of 12 hours is reasonable, based on operating experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging plant systems.

ACTIONS (continued)

D.1 and D.2

With one or more required SRMs inoperable in MODE 3 or 4, the neutron flux monitoring capability is degraded or nonexistent. The requirement to fully insert all insertable control rods ensures that the reactor will be at its minimum reactivity level while no neutron monitoring capability is available. Placing the reactor mode switch in the shutdown position prevents subsequent control rod withdrawal by maintaining a control rod block. The allowed Completion Time of 1 hour is sufficient to accomplish the Required Action, and takes into account the low probability of an event requiring the SRM occurring during this interval.

## E.1 and E.2

With one or more required SRMs inoperable in MODE 5, the ability to detect local reactivity changes in the core during refueling is degraded. CORE ALTERATIONS must be immediately suspended and action must be immediately initiated to fully insert all insertable control rods in core cells containing one or more fuel assemblies. Suspending CORE ALTERATIONS prevents the two most probable causes of reactivity changes, fuel loading and control rod withdrawal, from occurring. Inserting all insertable control rods ensures that the reactor will be at its minimum reactivity given that fuel is present in the core. Suspension of CORE ALTERATIONS shall not preclude completion of the movement of a component to a safe, conservative position.

Action (once required to be initiated) to insert control rods must continue until all insertable rods in core cells containing one or more fuel assemblies are inserted.

SURVEILLANCE As noted at the beginning of the SRs, the SRs for each SRM REQUIREMENTS Applicable MODE or other specified conditions are found in the SRs column of Table 3.3.1.2-1.

<u>SR 3.3.1.2.1 and SR 3.3.1.2.3</u>

Performance of the CHANNEL CHECK ensures that a gross failure of instrumentation has not occurred. A CHANNEL

(continued)

REQUIREMENTS

SURVEILLANCE SR 3.3.1.2.1 and SR 3.3.1.2.3 (continued)

CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on another channel. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the instrument channels could be an indication of excessive instrument drift in one of the channels or something even more serious. A CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying the instrumentation continues to operate properly between each CHANNEL CALIBRATION.

Agreement criteria are determined by the plant 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 instrument has drifted outside its limit.

The Frequency of once every 12 hours for SR 3.3.1.2.1 is based on operating experience that demonstrates channel failure is rare. While in MODES 3 and 4, reactivity changes are not expected; therefore, the 12 hour Frequency is relaxed to 24 hours for SR 3.3.1.2.3. The CHANNEL CHECK supplements less formal, but more frequent, checks of channels during normal operational use of the displays associated with the channels required by the LCO.

## SR 3.3.1.2.2

To provide adequate coverage of potential reactivity changes in the core, one SRM is required to be OPERABLE in the quadrant where CORE ALTERATIONS are being performed, and the other OPERABLE SRM must be in an adjacent quadrant containing fuel. Note 1 states that the SR is required to be met only during CORE ALTERATIONS. It is not required to be met at other times in MODE 5 since core reactivity changes are not occurring. This Surveillance consists of a review of plant logs to ensure that SRMs required to be OPERABLE for given CORE ALTERATIONS are, in fact, OPERABLE. In the event that only one SRM is required to be OPERABLE, per Table 3.3.1.2-1, footnote (b), only the a. portion of

SR 3.3.1.2.2 (continued)

SURVEILLANCE REQUIREMENTS

this SR is effectively required. Note 2 clarifies that more than one of the three requirements can be met by the same OPERABLE SRM. The 12 hour Frequency is based upon operating experience and supplements operational controls over refueling activities that include steps to ensure that the SRMs required by the LCO are in the proper quadrant.

#### SR 3.3.1.2.4

This Surveillance consists of a verification of the SRM instrument readout to ensure that the SRM reading is greater than a specified minimum count rate with the detector full in, which ensures that the detectors are indicating count rates indicative of neutron flux levels within the core. With few fuel assemblies loaded, the SRMs will not have a high enough count rate to satisfy the SR. Therefore, allowances are made for loading sufficient "source" material. in the form of irradiated fuel assemblies, to establish the minimum count rate.

To accomplish this, the SR is modified by a Note that states that the count rate is not required to be met on an SRM that has less than or equal to four fuel assemblies adjacent to the SRM and no other fuel assemblies are in the associated core guadrant. With four or less fuel assemblies loaded around each SRM and no other fuel assemblies in the associated core guadrant, even with a control rod withdrawn. the configuration will not be critical. When movable detectors are being used, detector location must be selected such that each group of fuel assemblies is separated by at least two fuel cells from any other fuel assemblies.

The Frequency is based upon channel redundancy and other information available in the control room, and ensures that the required channels are frequently monitored while core reactivity changes are occurring. When no reactivity changes are in progress, the Frequency is relaxed from 12 hours to 24 hours.

SURVEILLANCE REQUIREMENTS (continued)

#### SR 3.3.1.2.5 and SR 3.3.1.2.6

Performance of a CHANNEL FUNCTIONAL TEST demonstrates the associated channel will function properly. A successful test of the required contact(s) of a channel relay may be performed by the verification of the change of state of a single contact of the relay. This clarifies what is an acceptable CHANNEL FUNCTIONAL TEST of a relay. This is acceptable because all of the other required contacts of the relay are verified by other Technical Specifications and non-Technical Specifications tests at least once per refueling interval with applicable extensions. SR 3.3.1.2.5 is required in MODE 5, and the 7 day Frequency ensures that the channels are OPERABLE while core reactivity changes could be in progress. This Frequency is reasonable, based on operating experience and on other Surveillances (such as a CHANNEL CHECK), that ensure proper functioning between CHANNEL FUNCTIONAL TESTS.

SR 3.3.1.2.6 is required to be met in MODE 2 with IRMs on Range 2 or below, and in MODES 3 and 4. Since core reactivity changes do not normally take place in MODES 3 and 4 and core reactivity changes are due only to control rod movement in MODE 2, the Frequency is extended from 7 days to 31 days. The 31 day Frequency is based on operating experience and on other Surveillances (such as CHANNEL CHECK) that ensure proper functioning between CHANNEL FUNCTIONAL TESTS.

Verification of the signal to noise ratio also ensures that the detectors are inserted to an acceptable operating level. In a fully withdrawn condition, the detectors are sufficiently removed from the fueled region of the core to essentially eliminate neutrons from reaching the detector. Any count rate obtained while the detectors are fully withdrawn is assumed to be "noise" only.

With few fuel assemblies loaded, the SRMs will not have a high enough count rate to determine the signal to noise ratio. Therefore, allowances are made for loading sufficient "source" material, in the form of irradiated fuel assemblies, to establish the conditions necessary to determine the signal to noise ratio. To accomplish this, SR 3.3.1.2.5 is modified by a Note that states that the

(continued)

REQUIREMENTS

## SURVEILLANCE SR 3.3.1.2.5 and SR 3.3.1.2.6 (continued)

determination of signal to noise ratio is not required to be met on an SRM that has less than or equal to four fuel assemblies adjacent to the SRM and no other fuel assemblies are in the associated core quadrant. With four or less fuel assemblies loaded around each SRM and no other fuel assemblies in the associated quadrant, even with a control rod withdrawn the configuration will not be critical.

The Note to SR 3.3.1.2.6 allows the Surveillance to be delayed until entry into the specified condition of the Applicability (THERMAL POWER decreased to IRM Range 2 or below). The SR must be performed within 12 hours after IRMs are on Range 2 or below. The allowance to enter the Applicability with the 31 day Frequency not met is reasonable, based on the limited time of 12 hours allowed after entering the Applicability and the inability to perform the Surveillance while at higher power levels. Although the Surveillance could be performed while on IRM Range 3, the plant would not be expected to maintain steady state operation at this power level. In this event, the 12 hour Frequency is reasonable, based on the SRMs being otherwise verified to be OPERABLE (i.e., satisfactorily performing the CHANNEL CHECK) and the time required to perform the Surveillances.

#### SR 3.3.1.2.7

Performance of a CHANNEL CALIBRATION at a Frequency of 24 months verifies the performance of the SRM detectors and associated circuitry. The Frequency considers the plant conditions required to perform the test, the ease of performing the test, and the likelihood of a change in the system or component status. The neutron detectors are excluded from the CHANNEL CALIBRATION (Note 1) because they cannot readily be adjusted. The detectors are fission chambers that are designed to have a relatively constant sensitivity over the range and with an accuracy specified for a fixed useful life.

Note 2 to SR 3.3.1.2.6 allows the Surveillance to be delayed until entry into the specified condition of the

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	<u>SR 3.3.1.2.7</u> (continued)
REQUIREMENTS	Applicability. The SR must be performed in MODE 2 within 12 hours of entering MODE 2 with IRMs on Range 2 or below. The allowance to enter the Applicability with the 24 month Frequency not met is reasonable, based on the limited time of 12 hours allowed after entering the Applicability and the inability to perform the Surveillance while at higher power levels. Although the Surveillance could be performed while on IRM Range 3, the plant would not be expected to maintain steady state operation at this power level. In this event, the 12 hour Frequency is reasonable, based on the SRMs being otherwise verified to be OPERABLE (i.e., satisfactorily performing the CHANNEL CHECK) and the time required to perform the Surveillances.

REFERENCES None.

#### **B 3.3 INSTRUMENTATION**

B 3.3.2.1 Control Rod Block Instrumentation

BASES

Control rods provide the primary means for control of BACKGROUND reactivity changes. Control rod block instrumentation includes channel sensors, logic circuitry, switches, and relays that are designed to ensure that specified fuel design limits are not exceeded for postulated transients and accidents. During high power operation, the rod block monitor (RBM) provides protection for control rod withdrawal error events. During low power operations, control rod blocks from the rod worth minimizer (RWM) enforce specific control rod sequences designed to mitigate the consequences of the control rod drop accident (CRDA). During shutdown conditions, control rod blocks from the Reactor Mode Switch - Shutdown Position Function ensure that all control rods remain inserted to prevent inadvertent criticalities. The purpose of the RBM is to limit control rod withdrawal if localized neutron flux exceeds a predetermined setpoint during control rod manipulations (Ref. 1). It is assumed to function to block further control rod withdrawal to preclude a MCPR Safety Limit (SL) violation. The RBM supplies a trip signal to the Reactor Manual Control System (RMCS) to appropriately inhibit control rod withdrawal during power operation above the 30% RATED THERMAL POWER setpoint when a non-peripheral control rod is selected. The RBM has two channels, either of which can initiate a control rod block when the channel output exceeds the control rod block setpoint. One RBM channel inputs into one RMCS rod block circuit and the other RBM channel inputs into the second RMCS rod block circuit. The RBM channel signal is generated by averaging a set of local power range monitor (LPRM) signals. One RBM channel averages the signals from LPRM detectors at the A and C positions in the assigned LPRM assemblies, while the other RBM channel averages the signals from LPRM detectors at the B and D positions. Assignment of LPRM assemblies to be used in RBM averaging is controlled by the selection of control rods. The RBM is automatically bypassed and the output set to zero if a peripheral rod is selected or the APRM used to normalize the RBM reading is < 30% RTP. If any LPRM detector assigned to an RBM is

(continued)

BACKGROUND (continued) bypassed, the computed average signal is automatically adjusted to compensate for the number of LPRM input signals. The minimum number of LPRM inputs required for each RBM channel to prevent an instrument inoperative alarm is four when using four LPRM assemblies, three when using three LPRM assemblies, and two when using two LPRM assemblies. Each RBM also receives a recirculation loop flow signal from the associated flow converter.

> With no control rod selected, the RBM output is set to zero. However, when a control rod is selected, the gain of each RBM channel output is normalized to a reference APRM. The gain setting is held constant during the movement of that particular control rod to provide an indication of the change in the relative local power level. If the indicated power increases above the preset limit, a rod block will occur. In addition, to preclude rod movement with an inoperable RBM, a downscale trip and an inoperable trip are provided.

> The purpose of the RWM is to control rod patterns during startup and shutdown, such that only specified control rod sequences and relative positions are allowed over the operating range from all control rods inserted to 10% RTP. The sequences effectively limit the potential amount and rate of reactivity increase during a CRDA. A prescribed control rod sequence is stored in the RWM, which will initiate control rod withdrawal and insert blocks when the actual sequence deviates beyond allowances from the stored sequence. The RWM determines the actual sequence based on position indication for each control rod. The RWM also uses feedwater flow and steam flow signals to determine when the reactor power is above the preset power level at which the RWM is automatically bypassed (Ref. 2). The RWM is a single channel system that provides input into both RMCS rod block circuits.

> With the reactor mode switch in the shutdown position, a control rod withdrawal block is applied to all control rods to ensure that the shutdown condition is maintained. This Function prevents inadvertent criticality as the result of a control rod withdrawal during MODE 3 or 4, or during MODE 5 when the reactor mode switch is required to be in the

(continued) c	hutdown position. The reactor mode switch has two hannels, each inputting into a separate RMCS rod block fircuit. A rod block in either RMCS circuit will provide a control rod block to all control rods.
SAFETY ANALYSES, LCO, and T APPLICABILITY S e e c c c c c c c c c c c c c c c c c	. Rod Block Monitor The RBM is designed to prevent violation of the MCPR IL and the cladding 1% plastic strain fuel design limit that hay result from a single control rod withdrawal error (RWE) Event. The analytical methods and assumptions used in valuating the RWE event are summarized in Reference 3. The cycle-specific analysis considers the continuous withdrawal ft the maximum worth control rod at its maximum drive speed rom the reactor, which is operating at rated power with a control rod pattern that results in the core being placed on thermal design limits. The condition is analyzed to ensure that the results obtained are conservative; the approach iso serves to demonstrate the functions of the RBM. The RBM Function satisfies Criterion 3 of 0. CFR 50.36(c)(2)(ii). Wo channels of the RBM are required to be OPERABLE, with their setpoints within the appropriate Allowable Values specified in the CORE OPERATING LIMITS REPORT to ensure that to single instrument failure can preclude a rod block from this Function. The actual setpoints are calibrated consistent with applicable setpoint methodology. Nominal trip setpoints are specified in the setpoint calculations. The nominal setpoints are selected to ensure that the setpoint less conservative than the nominal trip setpoint. But within its Allowable Values of output at which an action should take place. The setpoints are compared to the actual process parameter (e.g., reactor power), and when the measured output value of the process parameter sobtained

(continued)

Dresden 2 and 3 B 3.3.2.1-3

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## APPLICABLE <u>1. Rod Block Monitor</u> (continued)

SAFETY ANALYSES, LCO, and APPLICABILITY from the safety analysis. The Allowable Values are derived from the analytic limits, corrected for calibration, process, and some of the instrument errors. The trip setpoints are then determined accounting for the remaining instrument errors (e.g., drift). The trip setpoints and allowable values derived in this manner provide adequate protection because instrumentation uncertainties, process effects, calibration tolerances, instrument drift, and severe environment errors (for channels that must function in harsh environments as defined by 10 CFR 50.49) are accounted for and appropriately applied for the instrumentation.

The RBM is assumed to mitigate the consequences of an RWE event when operating  $\geq$  30% RTP and a non-peripheral control rod is selected. Below this power level, or if a peripheral control rod is selected, the consequences of an RWE event will not exceed the MCPR SL and, therefore, the RBM is not required to be OPERABLE (Ref. 3).

## 2. Rod Worth Minimizer

The RWM enforces the analyzed rod position sequence to ensure that the initial conditions of the CRDA analysis are not violated. The analytical methods and assumptions used in evaluating the CRDA are summarized in References 4, 5, 6, 7, and 8. The analyzed rod position sequence requires that control rods be moved in groups, with all control rods assigned to a specific group required to be within specified banked positions. Requirements that the control rod sequence is in compliance with the analyzed rod position sequence are specified in LCO 3.1.6, "Rod Pattern Control."

The RWM Function satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii).

Since the RWM is a system designed to act as a backup to operator control of the rod sequences, only one channel of

#### APPLICABLE 2. Rod Worth <u>Minimizer</u> (continued)

SAFETY ANALYSES, LCO, and APPLICABILITY CONTROL REAL CONTROL ROW IS available and required to be OPERABLE (Ref. 9). Special circumstances provided for in the Required Action of LCO 3.1.3, "Control Rod OPERABILITY," and LCO 3.1.6 may necessitate bypassing the RWM to allow continued operation with inoperable control rods, or to allow correction of a control rod pattern not in compliance with the analyzed rod position sequence. The RWM may be bypassed as required by these conditions, but then it must be considered inoperable and the Required Actions of this LCO followed.

Compliance with the analyzed rod position sequence, and therefore OPERABILITY of the RWM, is required in MODES 1 and 2 when THERMAL POWER is  $\leq 10\%$  RTP. When THERMAL POWER is  $\geq 10\%$  RTP, there is no possible control rod configuration that results in a control rod worth that could exceed the 280 cal/gm fuel design limit during a CRDA (Refs. 4, 9, 10, and 11). In MODES 3 and 4, all control rods are required to be inserted into the core; therefore, a CRDA cannot occur. In MODE 5, since only a single control rod can be withdrawn from a core cell containing fuel assemblies, adequate SDM ensures that the consequences of a CRDA are acceptable, since the reactor will be subcritical.

### 3. Reactor Mode Switch-Shutdown Position

During MODES 3 and 4, and during MODE 5 when the reactor mode switch is in the shutdown position, the core is assumed to be subcritical; therefore, no positive reactivity insertion events are analyzed. The Reactor Mode Switch-Shutdown Position control rod withdrawal block ensures that the reactor remains subcritical by blocking control rod withdrawal, thereby preserving the assumptions of the safety analysis.

The Reactor Mode Switch-Shutdown Position Function satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii).

Two channels are required to be OPERABLE to ensure that no single channel failure will preclude a rod block when required. There is no Allowable Value for this Function since the channels are mechanically actuated based solely on reactor mode switch position.

APPLICABLE SAFETY ANALYSES,	<u>3. Reactor Mode Switch-Shutdown Position</u> (continued)
APPLICABILITY	During shutdown conditions (MODES 3 and 4, and MODE 5 when the reactor mode switch is in the shutdown position), no positive reactivity insertion events are analyzed because assumptions are that control rod withdrawal blocks are provided to prevent criticality. Therefore, when the reactor mode switch is in the shutdown position, the control rod withdrawal block is required to be OPERABLE. During MODE 5 with the reactor mode switch in the refueling position, the refuel position one-rod-out interlock (LCO 3.9.2, "Refuel Position One-Rod-Out Interlock") provides the required control rod withdrawal blocks.

#### ACTIONS

With one RBM channel inoperable, the remaining OPERABLE channel is adequate to perform the control rod block function; however, overall reliability is reduced because a single failure in the remaining OPERABLE channel can result in no control rod block capability for the RBM. For this reason, Required Action A.1 requires restoration of the inoperable channel to OPERABLE status. The Completion Time of 24 hours is based on the low probability of an event occurring coincident with a failure in the remaining OPERABLE channel.

## <u>B.1</u>

A.1

If Required Action A.1 is not met and the associated Completion Time has expired, the inoperable channel must be placed in trip within 1 hour. If both RBM channels are inoperable, the RBM is not capable of performing its intended function; thus, one channel must also be placed in trip. This initiates a control rod withdrawal block, thereby ensuring that the RBM function is met.

The 1 hour Completion Time is intended to allow the operator time to evaluate and repair any discovered inoperabilities and is acceptable because it minimizes risk while allowing time for restoration or tripping of inoperable channels.

### C.1, C.2.1.1, C.2.1.2, and C.2.2

ACTIONS (continued)

> With the RWM inoperable during a reactor startup, the operator is still capable of enforcing the prescribed control rod sequence. However, the overall reliability is reduced because a single operator error can result in violating the control rod sequence. Therefore, control rod movement must be immediately suspended except by scram. Alternatively, startup may continue if at least 12 control rods have already been withdrawn, or a reactor startup with an inoperable RWM during withdrawal of one or more of the first 12 control rods was not performed in the last 12 months. These requirements minimize the number of reactor startups initiated with the RWM inoperable. Required Actions C.2.1.1 and C.2.1.2 require verification of these conditions by review of plant logs and control room indications. Once Required Action C.2.1.1 or C.2.1.2 is satisfactorily completed, control rod withdrawal may proceed in accordance with the restrictions imposed by Required Action C.2.2. Required Action C.2.2 allows for the RWM Function to be performed manually and requires a double check of compliance with the prescribed rod sequence by a second licensed operator (Reactor Operator or Senior Reactor Operator) or other task qualified member of the technical staff (e.g., shift technical advisor or reactor engineer).

> The RWM may be bypassed under these conditions to allow continued operations. In addition, Required Actions of LCO 3.1.3 and LCO 3.1.6 may require bypassing the RWM, during which time the RWM must be considered inoperable with Condition C entered and its Required Actions taken.

## <u>D.1</u>

With the RWM inoperable during a reactor shutdown, the operator is still capable of enforcing the prescribed control rod sequence. Required Action D.1 allows for the RWM Function to be performed manually and requires a double check of compliance with the prescribed rod sequence by a second licensed operator (Reactor Operator or Senior Reactor Operator) or other task gualified member of the technical

# D.1 (continued) reactor shutdown to continue. E.1 and E.2With one Reactor Mode Switch-Shutdown Position control rod having one or two channels inoperable. In both cases (one or both channels inoperable), suspending fuel assemblies are fully inserted. As noted at the beginning of the SRs, the SRs for each SURVEILLANCE Control Rod Block instrumentation Function are found in the REQUIREMENTS SRs column of Table 3.3.2.1-1. The Surveillances are modified by a second Note to indicate that when an RBM channel is placed in an inoperable status

solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours provided the associated Function maintains control rod block capability. Upon completion of the Surveillance, or expiration of the 6 hour allowance, the channel must be returned to OPERABLE status or the applicable Condition entered and Required Actions taken. This Note is based on the reliability analysis (Ref. 12)

(continued)

## ACTIONS

staff (e.g., shift technical advisor or reactor engineer). The RWM may be bypassed under these conditions to allow the

withdrawal block channel inoperable, the remaining OPERABLE channel is adequate to perform the control rod withdrawal block function. However, since the Required Actions are consistent with the normal action of an OPERABLE Reactor Mode Switch-Shutdown Position Function (i.e., maintaining all control rods inserted), there is no distinction between

all control rod withdrawal and initiating action to fully insert all insertable control rods in core cells containing one or more fuel assemblies will ensure that the core is subcritical with adequate SDM ensured by LCO 3.1.1. Control rods in core cells containing no fuel assemblies do not affect the reactivity of the core and are therefore not required to be inserted. Action must continue until all insertable control rods in core cells containing one or more SURVEILLANCE assumption of the average time required to perform channel REQUIREMENTS (continued) Surveillance. That analysis demonstrated that the 6 hour testing allowance does not significantly reduce the probability that a control rod block will be initiated when necessary.

#### <u>SR 3.3.2.1.1</u>

A CHANNEL FUNCTIONAL TEST is performed for each RBM channel to ensure that the entire channel will perform the intended function. It includes the Reactor Manual Control "Relay Select Marix" System input. A successful test of the required contact(s) of a channel relay may be performed by the verification of the change of state of a single contact of the relay. This clarifies what is an acceptable CHANNEL FUNCTIONAL TEST of a relay. This is acceptable because all of the other required contacts of the relay are verified by other Technical Specifications and non-Technical Specifications tests at least once per refueling interval with applicable extensions.

Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology. The Frequency of 92 days is based on reliability analyses (Ref. 13).

## <u>SR 3.3.2.1.2 and SR 3.3.2.1.3</u>

A CHANNEL FUNCTIONAL TEST is performed for the RWM to ensure that the entire system will perform the intended function. A successful test of the required contact(s) of a channel relay may be performed by the verification of the change of state of a single contact of the relay. This clarifies what is an acceptable CHANNEL FUNCTIONAL TEST of a relay. This is acceptable because all of the other required contacts of the relay are verified by other Technical Specifications and non-Technical Specifications tests at least once per refueling interval with applicable extensions. The CHANNEL FUNCTIONAL TEST for the RWM is performed by attempting to withdraw a control rod not in compliance with the prescribed sequence and verifying a control rod block occurs and by attempting to select a control rod not in compliance with

(continued)

REQUIREMENTS

#### SURVEILLANCE <u>SR 3.3.2.1.2 and SR 3.3.2.1.3</u> (continued)

the prescribed sequence and verifying a selection error occurs. As noted in the SRs, SR 3.3.2.1.2 is not required to be performed until 1 hour after any control rod is withdrawn at  $\leq$  10% RTP in MODE 2, and SR 3.3.2.1.3 is not required to be performed until 1 hour after THERMAL POWER is  $\leq$  10% RTP in MODE 1. The Note to SR 3.3.2.1.2 allows entry into MODE 2 on a startup and entry into MODE 2 concurrent with power reduction to < 10% RTP during a shutdown to perform the required Surveillance if the 92 day Frequency is not met per SR 3.0.2. The Note to SR 3.3.2.1.3 allows a THERMAL POWER reduction to  $\leq$  10% RTP in MODE 1 to perform the required Surveillance if the 92 day Frequency is not met per SR 3.0.2. The 1 hour allowance is based on operating experience and in consideration of providing a reasonable time in which to complete the SRs. Operating experience has shown that these components usually pass the Surveillance when performed at the 92 day Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

#### <u>SR 3.3.2.1.4</u>

A CHANNEL CALIBRATION is a complete check of the instrument loop and the sensor. This test verifies the channel responds to the measured parameter within the necessary range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations consistent with the plant specific setpoint methodology.

As noted, neutron detectors are excluded from the CHANNEL CALIBRATION because they are passive devices, with minimal drift, and because of the difficulty of simulating a meaningful signal. Neutron detectors are adequately tested in SR 3.3.1.1.2 and SR 3.3.1.1.9.

The Frequency is based upon the assumption of a 92 day calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis.

SURVEILLANCE REQUIREMENTS (continued)

### SR 3.3.2.1.5

The RBM is automatically bypassed when power is below a specified value or if a peripheral control rod is selected. The power level is determined from the APRM signals input to each RBM channel. The automatic bypass setpoint must be verified periodically to be < 30% RTP. In addition. it must also be verified that the RBM is not bypassed when a control rod that is not a peripheral control rod is selected (only one non-peripheral control rod is required to be verified). If any bypass setpoint is nonconservative, then the affected RBM channel is considered inoperable. Alternatively, the APRM channel can be placed in the conservative condition to enable the RBM. If placed in this condition, the SR is met and the RBM channel is not considered inoperable. As noted, neutron detectors are excluded from the Surveillance because they are passive devices, with minimal drift, and because of the difficulty of simulating a meaningful signal. Neutron detectors are adequately tested in SR 3.3.1.1.2 and SR 3.3.1.1.9. The 92 day Frequency is based on the actual trip setpoint methodology utilized for these channels.

## <u>SR 3.3.2.1.6</u>

The RWM is automatically bypassed when power is above a specified value. The power level is determined from feedwater flow and steam flow signals. The automatic bypass setpoint must be verified periodically to be > 10% RTP. If the RWM low power setpoint is nonconservative, then the RWM is considered inoperable. Alternately, the low power setpoint channel can be placed in the conservative condition (nonbypass). If placed in the nonbypassed condition, the SR is met and the RWM is not considered inoperable. The Frequency is based on the trip setpoint methodology utilized for the low power setpoint channel.

## SR 3.3.2.1.7

A CHANNEL FUNCTIONAL TEST is performed for the Reactor Mode Switch-Shutdown Position Function to ensure that the entire channel will perform the intended function. A successful test of the required contact(s) of a channel relay may be performed by the verification of the change of state of a

SURVEILLANCE <u>SR 3.3.2.1.7</u> (continued)

single contact of the relay. This clarifies what is an acceptable CHANNEL FUNCTIONAL TEST of a relay. This is acceptable because all of the other required contacts of the relay are verified by other Technical Specifications and non-Technical Specifications tests at least once per refueling interval with applicable extensions. The CHANNEL FUNCTIONAL TEST for the Reactor Mode Switch - Shutdown Position Function is performed by attempting to withdraw any control rod with the reactor mode switch in the shutdown position and verifying a control rod block occurs.

As noted in the SR, the Surveillance is not required to be performed until 1 hour after the reactor mode switch is in the shutdown position, since testing of this interlock with the reactor mode switch in any other position cannot be performed without using jumpers, lifted leads, or movable links. This allows entry into MODES 3 and 4 if the 24 month Frequency is not met per SR 3.0.2. The 1 hour allowance is based on operating experience and in consideration of providing a reasonable time in which to complete the SRs.

The 24 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown these components usually pass the Surveillance when performed at the 24 month Frequency.

## <u>SR 3.3.2.1.8</u>

The RWM will only enforce the proper control rod sequence if the rod sequence is properly input into the RWM computer. This SR ensures that the proper sequence is loaded into the RWM so that it can perform its intended function. The Surveillance is performed once prior to declaring RWM OPERABLE following loading of sequence into RWM, since this is when rod sequence input errors are possible.

(continued)

REQUIREMENTS

SURVEILLANCE

### SR 3.3.2.1.9

- REQUIREMENTS LCO 3.1.3 and LCO 3.1.6 may require individual control rods (continued) to be bypassed (taken out of service) in the RWM to allow insertion of an inoperable control rod or correction of a control rod pattern not in compliance with the analyzed rod position sequence. With the control rods bypassed (taken out of service) in the RWM, the RWM will provide insert and withdraw blocks for bypassed control rods that are fully inserted and a withdraw block for bypassed control rods that are not fully inserted. To ensure the proper bypassing and movement of these affected control rods, a second licensed operator (Reactor Operator or Senior Reactor Operator) or other task qualified member of the technical staff (e.g., shift technical advisor or reactor engineer) must verify the bypassing and position of these control rods. Compliance with this SR allows the RWM to be OPERABLE with these control rods bypassed.
- REFERENCES 1. UFSAR, Section 7.6.1.5.3.
  - 2. UFSAR, Section 7.7.2.
  - 3. UFSAR, Section 15.4.2.3.
  - 4. UFSAR, Section 15.4.10.
  - 5. XN-NF-80-19(P)(A), Volume 1, Supplement 2, Section 7.1 Exxon Nuclear Methodology for Boiling Water Reactor-Neutronics Methods for Design and Analysis, (as specified in Technical Specification 5.6.5).
  - NEDE-24011-P-A, "GE Standard Application for Reactor Fuel," (as specified in Technical Specification 5.6.5).
  - Letter to T.A. Pickens (BWROG) from G.C. Lainas (NRC), "Amendment 17 to General Electric Licensing Topical Report NEDE-24011-P-A," BWROG-8644, August 15, 1986.
  - 8. NFSR-0091, Benchmark of CASMO/MICROBURN BWR Nuclear Design Methods, Commonwealth Edison Topical Report, (as specified in Technical Specification 5.6.5).

REFERENCES (continued)	9.	NRC SER, "Acceptance of Referencing of Licensing Topical Report NEDE-24011–P-A," "General Electric Standard Application for Reactor Fuel, Revision 8, Amendment 17," December 27, 1987.
	10.	"Modifications to the Requirements for Control Rod Drop Accident Mitigating Systems," BWR Owners' Group, July 1986.
	11.	EMF-2237(P), "Dresden Units 2 and 3 Reduced Low Power Set Point Analysis for Control Rod Drop Accident," July 1999.
	12.	GENE-770-06-1-A, "Addendum to Bases for Changes to Surveillance Test Intervals and Allowed Out-of-Service Times for Selected Instrumentation Technical Specifications," December 1992.
	13.	NEDC-30851-P-A, Supplement 1, "Technical Specification Improvement Analysis for BWR Control Rod Block Instrumentation," October 1988.

### B 3.3 INSTRUMENTATION

B 3.3.2.2 Feedwater System and Main Turbine High Water Level Trip Instrumentation

BASES

BACKGROUND The Feedwater System and Main Turbine High Water Level Trip Instrumentation is designed to detect a potential failure of the Feedwater Level Control System that causes excessive feedwater flow.

> With excessive feedwater flow, the water level in the reactor vessel rises toward the high water level reference point, causing the trip of the three feedwater pumps and the main turbine.

> Reactor Vessel Water Level — High signals are provided by level transmitters that sense the difference between the pressure due to a constant column of water (reference leg) and the pressure due to the actual water level in the reactor vessel (variable leg). Four channels of Reactor Vessel Water Level — High instrumentation are provided as input to two trip systems. Each trip system is arranged with a two-out-of-two initiation logic that trips the three feedwater pumps and the main turbine. The channels include electronic equipment (e.g., trip units) that compares measured input signals with pre-established setpoints. When the setpoint is exceeded, the channel output relay actuates, which then outputs a feedwater pump and main turbine trip signal to the trip logic.

> A trip of the feedwater pumps limits further increase in reactor vessel water level by limiting further addition of feedwater to the reactor vessel. A trip of the main turbine and closure of the stop valves protects the turbine from damage due to water entering the turbine.

APPLICABLE The Feedwater System and Main Turbine High Water Level Trip SAFETY ANALYSES Instrumentation is assumed to be capable of providing a feedwater pump and main turbine trip in the design basis transient analysis for a feedwater controller failure, maximum demand event (Ref. 1). The high level trip

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APPLICABLE SAFETY ANALYSES (continued)	indirectly initiates a reactor scram from the main turbine trip (above 45% RTP) and trips the feedwater pumps, thereby terminating the event. The reactor scram mitigates the reduction in MCPR.			
	Feedwater System and Main Turbine High Water Level Trip Instrumentation satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii).			

LCO

The LCO requires four channels of the Reactor Vessel Water Level-High instrumentation to be OPERABLE to ensure that no single instrument failure will prevent the feedwater pumps and main turbine trip on a valid high level signal. Two channels are needed to provide trip signals in order for the feedwater pump and main turbine trips to occur. Each channel must have its setpoint set within the specified Allowable Value of SR 3.3.2.2.4. The Allowable Value is set to ensure that the thermal limits are not exceeded during the event. The actual setpoint is calibrated to be consistent with the applicable setpoint methodology assumptions. Nominal trip setpoints are specified in the setpoint calculations. The nominal setpoints are selected to ensure that the setpoints do not exceed the Allowable Value between successive CHANNEL CALIBRATIONS. Operation with a trip setpoint less conservative than the nominal trip setpoint, but within its Allowable Value. is acceptable. A channel is inoperable if its actual trip setpoint is not within its required Allowable Value.

Trip setpoints are those predetermined values of output at which an action should take place. The setpoints are compared to the actual process parameter (e.g., reactor vessel water level), and when the measured output value of the process parameter exceeds the setpoint, the associated device (e.g., trip unit) changes state. The analytic limits are derived from the limiting values of the process parameters obtained from the safety analysis. The trip setpoints are determined from the analytic limits, corrected for defined process, calibration, and instrument errors. The Allowable Values are then determined, based on the trip setpoint values, by accounting for the calibration based errors. These calibration based errors are limited to reference accuracy, instrument drift, errors associated with

(continued)

BASES

LCO measurement and test equipment, and calibration tolerance of (continued) loop components. The trip setpoints and Allowable Values determined in this manner provide adequate protection because instrument uncertainties, process effects, calibration tolerances, instrument drift, and severe environment errors (for channels that must function in harsh environments as defined by 10 CFR 50.49) are accounted for and appropriately applied for the instrumentation.

APPLICABILITY The Feedwater System and Main Turbine High Water Level Trip Instrumentation is required to be OPERABLE at  $\geq 25\%$  RTP to ensure that the fuel cladding integrity Safety Limit and the cladding 1% plastic strain limit are not violated during the feedwater controller failure, maximum demand event. As discussed in the Bases for LCO 3.2.1, "AVERAGE PLANAR LINEAR HEAT GENERATION RATE (APLHGR)," LCO 3.2.2, "MINIMUM CRITICAL POWER RATIO (MCPR)," LCO 3.2.3, "LINEAR HEAT GENERATION RATE," and LCO 3.2.4, "Average Power Range Monitor (APRM) Gain and Setpoint," sufficient margin to these limits exists below 25% RTP; therefore, these requirements are only necessary when operating at or above this power level.

A Note has been provided to modify the ACTIONS related to ACTIONS Feedwater System and Main Turbine High Water Level Trip Instrumentation channels. Section 1.3. Completion Times, specifies that once a Condition has been entered, subsequent divisions subsystems, components, or variables expressed in the Condition. discovered to be inoperable or not within limits, will not result in separate entry into the Condition. Section 1.3 also specifies that Required Actions of the Condition continue to apply for each additional failure, with Completion Times based on initial entry into the Condition. However, the Required Actions for inoperable Feedwater System and Main Turbine High Water Level Trip Instrumentation channels provide appropriate compensatory measures for separate inoperable channels. As such, a Note has been provided that allows separate Condition entry for each inoperable Feedwater System and Main Turbine High Water Level Trip Instrumentation channel.

BASES

ACTIONS (continued)

<u>A.1</u>

With one or more channels inoperable and trip capability is maintained, the remaining OPERABLE channels can provide the required trip signal. However, overall instrumentation reliability is reduced because a single failure in one of the remaining channels concurrent with feedwater controller failure, maximum demand event, may result in the instrumentation not being able to perform its intended function. Therefore, continued operation is only allowed for a limited time. If the inoperable channel(s) cannot be restored to OPERABLE status within the Completion Time, the channel(s) must be placed in the tripped condition per Required Action A.1. Placing the inoperable channel(s) in trip would conservatively compensate for the inoperability(s). restore capability to accommodate a single failure, and allow operation to continue with no further restrictions. Alternately, if it is not desired to place the channel(s) in trip (e.g., as in the case where placing the inoperable channel(s) in trip would result in a feedwater or main turbine trip), Condition C must be entered and its Required Action taken.

The Completion Time of 7 days is based on the low probability of the event occurring coincident with a single failure in a remaining OPERABLE channel.

## <u>B.1</u>

With the Feedwater System and main turbine high water level trip capability not maintained, the Feedwater System and Main Turbine High Water Level Trip Instrumentation cannot perform its design function. Therefore, continued operation is only permitted for a 2 hour period, during which Feedwater System and main turbine high water level trip capability must be restored. The trip capability is considered maintained when sufficient channels are OPERABLE or in trip such that the Feedwater System and main turbine high water level trip logic will generate a trip signal on a valid signal. This requires two channels in the same trip system to be OPERABLE or in trip. If the required channels cannot be restored to OPERABLE status or placed in trip, Condition C must be entered and its Required Action taken.

<u>(continued)</u>

#### ACTIONS <u>B.1</u> (continued)

The 2 hour Completion Time is sufficient for the operator to take corrective action, and takes into account the likelihood of an event requiring actuation of Feedwater System and Main Turbine High Water Level Trip Instrumentation occurring during this period. It is also consistent with the 2 hour Completion Time provided in LCO 3.2.2 for Required Action A.1, since this instrumentation's purpose is to preclude a MCPR violation.

#### <u>C.1 and C.2</u>

With the required channels not restored to OPERABLE status or placed in trip, THERMAL POWER must be reduced to < 25% RTP within 4 hours. As discussed in the Applicability section of the Bases, operation below 25% RTP results in sufficient margin to the required limits, and the Feedwater System and Main Turbine High Water Level Trip Instrumentation is not required to protect fuel integrity during the feedwater controller failure, maximum demand event. Alternatively, if a channel is inoperable solely due to an inoperable feedwater pump breaker, the affected feedwater pump breaker may be removed from service since this performs the intended function of the instrumentation. The allowed Completion Time of 4 hours is based on operating experience to reduce THERMAL POWER to < 25% RTP from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE REQUIREMENTS The Surveillances are modified by a Note to indicate that when a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours provided the associated Function maintains Feedwater System and main turbine high water level trip capability. Upon completion of the Surveillance, or expiration of the 6 hour allowance, the channel must be returned to OPERABLE status or the applicable Condition entered and Required Actions taken. This Note is based on the reliability analysis (Ref. 2) assumptions that 6 hours is the average

<u>(continued)</u>

SURVEILLANCE time required to perform channel Surveillance. That REQUIREMENTS (continued) analysis demonstrated that the 6 hour testing allowance does not significantly reduce the probability that the feedwater pumps and main turbine will trip when necessary.

#### <u>SR 3.3.2.2.1</u>

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

Agreement criteria are determined by the plant 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 instrument has drifted outside its limits.

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

## SR 3.3.2.2.2

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the channel will perform the intended function. A successful test of the required contact(s) of a channel relay may be performed by the verification of the change of state of a single contact of the relay. This clarifies what is an acceptable CHANNEL FUNCTIONAL TEST of a relay. This is acceptable because all of the other required contacts of the relay are verified by other Technical

(continued)

BASES	
SURVEILLANCE REQUIREMENTS	<u>SR 3.3.2.2.2</u> (continued)
	Specifications and non-Technical Specifications tests at least once per refueling interval with applicable extensions. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology.
	The Frequency of 92 days is based on reliability analysis (Ref. 2).
	<u>SR 3.3.2.2.3</u>
	Calibration of trip units provides a check of the actual trip setpoints. The channel must be declared inoperable if the trip setting is discovered to be less conservative than the Allowable Value specified in SR 3.3.2.2.4. If the trip setting is discovered to be less conservative than the setting accounted for in the appropriate setpoint methodology, but is not beyond the Allowable Value, the channel performance is still within the requirements of the plant safety analysis. Under these conditions, the setpoint must be readjusted to be equal to or more conservative than accounted for in the appropriate setpoint methodology.
	The Frequency of 92 days is based on engineering judgement and the reliability of these components.
	<u>SR_3.3.2.2.4</u>
	CHANNEL CALIBRATION is a complete check of the instrument loop and the sensor. This test verifies the channel responds to the measured parameter within the necessary range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations consistent with the plant specific setpoint methodology.
	The Frequency is based upon the assumption of a 24 month calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis.
	(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)	<u>SR 3.3.2.2.5</u> The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required trip logic for a specific channel. The system functional test of the feedwater pump breakers and main turbine stop valves is included as part of this Surveillance and overlaps the LOGIC SYSTEM FUNCTIONAL TEST to provide complete testing of the assumed safety function. Therefore, if a main turbine stop valve or feedwater pump breaker is incapable of operating, the associated instrumentation would also be inoperable. The 24 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown that these components usually pass the Surveillance when performed at the 24 month Frequency.	
REFERENCES	1. UFSAR, Section 15.1.2.	
	<ol> <li>GENE-770-06-1-A, "Bases for Changes to Surveillance Test Intervals and Allowed Out-of-Service Times for Selected Instrumentation Technical Specifications," December 1992.</li> </ol>	

## **B 3.3 INSTRUMENTATION**

## B 3.3.3.1 Post Accident Monitoring (PAM) Instrumentation

## BASES

BACKGROUND	The primary purpose of the PAM instrumentation is to display, in the control room, plant variables that provide information required by the control room operators during accident situations. This information provides the necessary support for the operator to take the manual actions for which no automatic control is provided and that are required for safety systems to accomplish their safety functions for Design Basis Events. The instruments that monitor these variables are designated as Type A, Category I, and non-Type A, Category I, in accordance with Regulatory Guide 1.97 (Ref. 1).
	The OPERABILITY of the accident monitoring instrumentation ensures that there is sufficient information available on selected plant parameters to monitor and assess plant status and behavior following an accident. This capability is consistent with the recommendations of Reference 1.
APPLICABLE SAFETY ANALYSES	The PAM instrumentation LCO ensures the OPERABILITY of Regulatory Guide 1.97, Type A variables so that the control room operating staff can:
	<ul> <li>Perform the diagnosis specified in the Emergency Operating Procedures (EOPs). These variables are restricted to preplanned actions for the primary success path of Design Basis Accidents (DBAs), (e.g., loss of coolant accident (LOCA)), and</li> </ul>
	<ul> <li>Take the specified, preplanned, manually controlled actions for which no automatic control is provided, which are required for safety systems to accomplish their safety function.</li> </ul>
	The PAM instrumentation LCO also ensures OPERABILITY of Category I, non-Type A, variables so that the control room operating staff can:
	<ul> <li>Determine whether systems important to safety are performing their intended functions;</li> </ul>
	(continued)

<u>(continued)</u>

APPLICABLE SAFETY ANALYSES (continued)	<ul> <li>Determine the potential for causing a gross breach of the barriers to radioactivity release;</li> </ul>
	<ul> <li>Determine whether a gross breach of a barrier has occurred; and</li> </ul>
	<ul> <li>Initiate action necessary to protect the public and for an estimate of the magnitude of any impending threat.</li> </ul>
	The plant specific Regulatory Guide 1.97 Analysis (Ref. 2) documents the process that identified Type A and Category I, non-Type A, variables.
	Accident monitoring instrumentation that satisfies the definition of Type A in Regulatory Guide 1.97 meets Criterion 3 of 10 CFR 50.36(c)(2)(ii). Category I, non-Type A, instrumentation is retained in Technical Specifications (TS) because they are intended to assist operators in minimizing the consequences of accidents. Therefore, these Category I variables are important for reducing public risk.
LCO	LCO 3.3.3.1 requires two OPERABLE channels for all but one

LCO 3.3.3.1 requires two OPERABLE channels for all but one Function to ensure that no single failure prevents the operators from being presented with the information necessary to determine the status of the plant and to bring the plant to, and maintain it in, a safe condition following an accident. Furthermore, providing two channels allows a CHANNEL CHECK during the post accident phase to confirm the validity of displayed information.

The exception to the two channel requirement is primary containment isolation valve (PCIV) position. In this case, the important information is the status of the primary containment penetrations. The LCO requires one position indicator for each active (e.g., automatic) PCIV. This is sufficient to redundantly verify the isolation status of each isolable penetration either via indicated status of the active valve and prior knowledge of passive valve or via system boundary status. If a normally active PCIV is known to be closed and deactivated, position indication is not needed to determine status. Therefore, the position indication for closed and deactivated valves is not required to be OPERABLE.

(continued)

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LCO The following list is a discussion of the specified (continued) instrument Functions listed in Table 3.3.3.1-1.

## 1. Reactor Vessel Pressure

Reactor vessel pressure is a Type A and Category I variable provided to support monitoring of Reactor Coolant System (RCS) integrity and to verify operation of the Emergency Core Cooling Systems (ECCS). Two independent pressure transmitters with a range of 0 psig to 1500 psig monitor pressure and provide pressure indication to the control room. The output from one of these channels is recorded on an independent pen recorder and the other channel output is directed to an indicator. The wide range recorder and indicator are the primary indications used by the operator during an accident. Therefore, the PAM Specification deals specifically with this portion of the instrument channel.

## 2. Reactor Vessel Water Level

Reactor vessel water level is a Type A and Category I variable provided to support monitoring of core cooling and to verify operation of the ECCS. Two different range channels, wide range and medium range, provide the PAM Reactor Vessel Water Level Function. The wide range water level channels measure from approximately 203 inches above the top of active fuel to approximately 197 inches below the top of active fuel while the medium range channels measure from approximately 83 inches above the top of active fuel to approximately 203 inches above the top of active fuel. Wide range water level is measured by two independent differential pressure transmitters. The output from one of these channels is recorded on an independent pen recorder and the other output is directed to an indicator. Medium range level is measured by two independent differential pressure transmitters. The output from these channels is directed to two independent indicators. These instruments are the primary indications used by the operator during an accident. Therefore, the PAM Specification deals specifically with this portion of the instrument channel.

#### 2. Reactor Vessel Water Level (continued)

The reactor vessel water level instruments are uncompensated for variation in reactor water density and are calibrated to be most accurate at a specific vessel pressure and temperature. The wide range instruments are calibrated to be accurate at post-DBA LOCA pressure and temperature. The medium range instruments are calibrated to be accurate at the normal operating pressure and temperature.

#### 3. Torus Water Level

Torus water level is a Type A and Category I variable provided to detect a breach in the reactor coolant pressure boundary (RCPB). This variable is also used to verify and provide long term surveillance of ECCS function. The wide range torus water level measurement provides the operator with sufficient information to assess the status of both the RCPB and the water supply to the ECCS. The wide range water level indicators monitor the torus water level from the bottom to the top of the torus. Two wide range torus water level signals are transmitted from separate differential pressure transmitters to two control room indicators and also continuously displayed on two recorders in the control room. These instruments are the primary indication used by the operator during an accident. Therefore, the PAM Specification deals specifically with this portion of the instrument channel.

#### 4. Drywell Pressure

Drywell pressure is a Type A and Category I variable provided to detect a breach of the RCPB and to verify ECCS functions that operate to maintain RCS integrity. Two different range channels provide the PAM Drywell Pressure Function. The wide range instruments measure from -5 psig to 250 psig while the narrow range instruments monitor between -5 psig and 70 psig. The wide range drywell pressure signals are transmitted from separate pressure transmitters and are continuously recorded on two control room recorders and displayed on two control room indicators. Two narrow range drywell pressure signals are transmitted

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LCO

LCO

# <u>4. Drywell Pressure</u> (continued)

from separate transmitters and are continuously displayed on independent indicators in the control room. These recorders and indicators are the primary indications used by the operator during an accident. Therefore, the PAM Specification deals specifically with this portion of the instrument channel. The drywell pressure channels also satisfy the Reference 2 monitoring requirement for suppression chamber (torus) pressure (a Type A and Category 1 variable) since the suppression chamber-to-drywell vacuum breakers ensure the suppression chamber pressure is maintained within 0.5 psig of the drywell pressure.

## 5. Drywell Radiation

Drywell radiation is a Category 1 variable provided to monitor the potential of significant radiation releases and to provide release assessment for use by operators in determining the need to invoke site emergency plans. Two redundant radiation sensors are located in capped drywell penetrations and have a range from 10° R/hr to 10<sup>8</sup> R/hr. These radiation monitors display on recorders located in the control room. Two radiation monitors/recorders are required to be OPERABLE (one per division). Therefore, the PAM Specification deals specifically with this portion of the instrument channel.

# <u>6. Penetration Flow Path Primary Containment Isolation</u> Valve (PCIV) Position

PCIV (excluding check valves) position is a Category 1 variable provided for verification of containment integrity. In the case of PCIV position, the important information is the isolation status of the containment penetration. The LCO requires one channel of valve position indication in the control room to be OPERABLE for each active PCIV in a containment penetration flow path requiring post-accident valve position indication, i.e., two total channels of PCIV position indication for a penetration flow path with two active valves requiring post-accident valve position indication. For containment penetrations with only one

(continued)

LC0

## <u>6. Penetration Flow Path Primary Containment Isolation</u> Valve (PCIV) Position (continued)

active PCIV having control room indication, Note (b) requires a single channel of valve position indication to be OPERABLE. This is sufficient to redundantly verify the isolation status of each isolable penetration via indicated status of the active valve, as applicable, and prior knowledge of passive valve or system boundary status. If a penetration flow path is isolated, position indication for the PCIV(s) in the associated penetration flow path is not needed to determine status. Therefore, the position indication for valves in an isolated penetration flow path is not required to be OPERABLE. Each penetration is treated separately and each penetration flow path is considered a separate function. Therefore, separate Condition entry is allowed for each inoperable penetration flow path.

The indication for each PCIV is provided at the valve controls in the control room. Each indication consists of green and red indicator lights that illuminate to indicate whether the PCIV is fully open, fully closed, or in a midposition. Therefore, the PAM Specification deals specifically with this portion of the instrumentation channel.

## 7, 8. Drywell Hydrogen and Oxygen Concentration Analyzers and Monitors

Drywell hydrogen and oxygen analyzers and monitors are Category I instruments provided to detect high hydrogen or oxygen concentration conditions that represent a potential for containment breach. This variable is also important in verifying the adequacy of mitigating actions. Hydrogen and oxygen concentrations are each measured by two independent analyzers and are monitored in the control room. The drywell hydrogen and oxygen analyzer PAM instrumentation consists of two independent gas analyzer systems. Each gas analyzer system consists of a hydrogen analyzer and an oxygen analyzer. The analyzers are capable of determining hydrogen concentration in the range of 0% to 10% and oxygen concentration in the range of 0% to 10%. Each gas analyzer system must be capable of sampling the drywell. There are two independent recorders in the control room to display the results.

#### 9. Torus Water Temperature

LCO (continued)

Torus water temperature is a Type A and Category I variable provided to detect a condition that could potentially lead to containment breach and to verify the effectiveness of ECCS actions taken to prevent containment breach. The torus water temperature instrumentation allows operators to detect trends in torus water temperature in sufficient time to take action to prevent steam quenching vibrations in the torus. Sixteen temperature sensors are arranged in two groups of eight sensors in independent and redundant channels, located such that there are two sensors (one inner and one outer) located in each of the four quadrants to assure an accurate measurement of bulk water temperature. The range of the torus water temperature channels is 0°F to 300°F.

Thus, two groups of sensors are sufficient to monitor the bulk average temperature of the torus water. Each group of eight sensors is averaged to provide two bulk temperature inputs for PAM. The averaged temperatures are recorded on two independent recorders in the control room. Both of these recorders must be OPERABLE to furnish two channels of PAM indication. These recorders are the primary indication used by the operator during an accident. Therefore, the PAM Specification deals specifically with this portion of the instrument channels.

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

ACTIONS Note 1 has been added to the ACTIONS to exclude the MODE change restriction of LCO 3.0.4. This exception allows entry into the applicable MODE while relying on the ACTIONS even though the ACTIONS may eventually require plant shutdown. This exception is acceptable due to the passive function of the instruments, the operator's ability to

ACTIONS (continued) diagnose an accident using alternative instruments and methods, and the low probability of an event requiring these instruments.

Note 2 has been provided to modify the ACTIONS related to PAM instrumentation channels. Section 1.3, Completion Times, specifies that once a Condition has been entered, subsequent divisions, subsystems, components, or variables expressed in the Condition discovered to be inoperable or not within limits, will not result in separate entry into the Condition. Section 1.3 also specifies that Required Actions of the Condition continue to apply for each additional failure, with Completion Times based on initial entry into the Condition. However, the Required Actions for inoperable PAM instrumentation channels provide appropriate compensatory measures for separate Functions. As such, a Note has been provided that allows separate Condition entry for each inoperable PAM Function.

## <u>A.1</u>

When one or more Functions have one required channel that is inoperable, the required inoperable channel must be restored to OPERABLE status within 30 days. The 30 day Completion Time is based on operating experience and takes into account the remaining OPERABLE channels or remaining isolation barrier (in the case of primary containment penetrations with only one PCIV), the passive nature of the instrument (no critical automatic action is assumed to occur from these instruments), and the low probability of an event requiring PAM instrumentation during this interval.

## <u>B.1</u>

If a channel has not been restored to OPERABLE status in 30 days, this Required Action specifies initiation of action in accordance with Specification 5.6.6, which requires a written report to be submitted to the NRC. This report discusses the results of the root cause evaluation of the inoperability and identifies proposed restorative actions. This Required Action is appropriate in lieu of a shutdown

(continued)

#### ACTIONS <u>B.1</u> (continued)

requirement, since another OPERABLE channel is monitoring the Function, an alternate method of monitoring is available, and given the likelihood of plant conditions that would require information provided by this instrumentation.

## <u>C.1</u>

When one or more Functions have two required channels that are inoperable (i.e., two channels inoperable in the same Function), one channel in the Function should be restored to OPERABLE status within 7 days. The Completion Time of 7 days is based on the relatively low probability of an event requiring PAM instrument operation and the availability of alternate means to obtain the required information. Continuous operation with two required channels inoperable in a Function is not acceptable because the alternate indications may not fully meet all performance qualification requirements applied to the PAM instrumentation. Therefore, requiring restoration of one inoperable channel of the Function limits the risk that the PAM Function will be in a degraded condition should an accident occur.

#### <u>D.1</u>

This Required Action directs entry into the appropriate Condition referenced in Table 3.3.3.1-1. The applicable Condition referenced in the Table is Function dependent. Each time an inoperable channel has not met the Required Action of Condition C and the associated Completion Time has expired, Condition D is entered for that channel and provides for transfer to the appropriate subsequent Condition.

# <u>E.1</u>

For the majority of Functions in Table 3.3.3.1-1, if the Required Action and associated Completion Time of Condition C is not met, the plant must be brought to a MODE

(continued)

#### ACTIONS <u>E.1</u> (continued)

in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

## <u>F.1</u>

Since alternate means of monitoring drywell radiation have been developed and tested, the Required Action is not to shut down the plant, but rather to follow the directions of Specification 5.6.6. These alternate means may be temporarily installed if the normal PAM channel cannot be restored to OPERABLE status within the allotted time. The report provided to the NRC should discuss the alternate means used, describe the degree to which the alternate means are equivalent to the installed PAM channels, justify the areas in which they are not equivalent, and provide a schedule for restoring the normal PAM channels.

SURVEILLANCE	As noted at the beginning of the SRs, the following SRs
REQUIREMENTS	apply to each PAM instrumentation Function in
	Table 3.3.3.1-1, except where identified in the SR.

The Surveillances are modified by a second Note to indicate that when a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours, provided the other required channel in the associated Function is OPERABLE. Upon completion of the Surveillance, or expiration of the 6 hour allowance, the channel must be returned to OPERABLE status or the applicable Condition entered and Required Actions taken. The 6 hour testing allowance is acceptable since it does not significantly reduce the probability of properly monitoring post-accident parameters, when necessary.

SURVEILLANCE REQUIREMENTS <u>SR 3.3.3.1.1</u>

Performance of the CHANNEL CHECK once every 31 days ensures (continued) that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel against 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 instrument channels could be an indication of excessive instrument drift in one of the channels or something even more serious. A CHANNEL CHECK will detect gross channel failure: thus, it is key to verifying the instrumentation continues to operate properly between each CHANNEL CALIBRATION. The high radiation instrumentation should be compared to similar plant instruments located throughout the plant.

> Agreement criteria are determined by the plant 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 of 31 days is based upon plant operating experience, with regard to channel OPERABILITY and drift, which demonstrates that failure of more than one channel of a given Function in any 31 day interval is rare. The CHANNEL CHECK supplements less formal, but more frequent, checks of channels during normal operational use of those displays associated with the channels required by the LCO.

# <u>SR 3.3.1.2, SR 3.3.1.3, SR 3.3.3.1.4, and</u> SR 3.3.3.1.5

A CHANNEL CALIBRATION is performed every 92 days for Functions 4.b, 7, and 8, every 184 days for Functions 1 and 2 (recorder only), every 12 months for Functions 3 and 9, and every 24 months for Functions 2, 4.b, 5, and 6. CHANNEL CALIBRATION is a complete check of the instrument loop, including the sensor. The test verifies the channel responds to measured parameter with the necessary range and accuracy. For Function 5, the CHANNEL CALIBRATION shall

SURVEILLANCE REQUIREMENTS	<u>SR 3.3.1.2, SR 3.3.1.3, SR 3.3.3.1.4, and</u> <u>SR 3.3.3.1.5</u> (continued)		
	consist of an electronic calibration of the channel, excluding the detector, for range decades > 10 R/hour and a one point calibration check of the detector with an installed or portable gamma source for the range decade < 10 R/hour. For Function 6, the CHANNEL CALIBRATION shall consist of verifying that the position indication conforms to actual valve position.		
	The Note to SR 3.3.3.1.3 states that for Function 2, this SR is not required for the transmitters of these channels. This allowance is consistent with the plant specific setpoint methodology. This portion of the Function 2 channels must be calibrated in accordance with SR 3.3.3.1.5.		
	The Frequency of 92 days for Functions 4.b, 7, and 8, 184 days for Functions 1 and 2 (recorder only), and 12 months for Functions 3 and 9, for CHANNEL CALIBRATION is based on operating experience.		
	The 24 month Frequency for CHANNEL CALIBRATION of Functions 2, 4.a, 5, and 6 is based on operating experience and consistency with the refueling cycles.		
REFERENCES	<ol> <li>Regulatory Guide 1.97, "Instrumentation for Light Water Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident," Revision 2, December 1980.</li> </ol>		
	2. NRC letter, D.R. Muller (NRC) to H.E. Bliss (Commonwealth Edison Company), "Emergency Response Capability – Conformance to Regulatory Guide 1.97 Revision 2, Dresden Unit Nos. 2 and 3," September 1,		

1988.

## B 3.3 INSTRUMENTATION

B 3.3.4.1 Anticipated Transient Without Scram Recirculation Pump Trip (ATWS-RPT) Instrumentation

#### BASES

BACKGROUND The ATWS-RPT System initiates an RPT, adding negative reactivity, following events in which a scram does not but should occur, to lessen the effects of an ATWS event. Tripping the recirculation pumps adds negative reactivity from the increase in steam voiding in the core area as core flow decreases. When Reactor Vessel Water Level-Low Low or Reactor Vessel Steam Dome Pressure-High setpoint is reached, the recirculation motor generator (MG) drive motor field breakers trip.

> The ATWS-RPT System (Ref. 1) includes sensors, relays, bypass capability circuit breakers, and switches that are necessary to cause initiation of an RPT. The channels include electronic equipment (e.g., trip units) that compares measured input signals with pre-established setpoints. When the setpoint is exceeded, the channel output relay actuates, which then outputs an ATWS-RPT signal to the trip logic.

> The ATWS-RPT consists of two independent trip systems, with two channels of Reactor Vessel Steam Dome Pressure-High and two channels of Reactor Vessel Water Level-Low Low in each trip system. Each ATWS-RPT trip system is a two-out-of-two logic for each Function. Thus, either two Reactor Water Level-Low Low or two Reactor Pressure-High signals are needed to trip a trip system. The outputs of the channels in a trip system are combined in a logic so that either trip system will trip both recirculation pumps (by tripping the respective MG drive motor field breakers). Each Reactor Vessel Water Level - Low Low channel output must remain below the setpoint for approximately 9 seconds for the channel output to provide an actuation signal to the associated trip system.

There is one MG drive motor field breaker provided for each of the two recirculation pumps for a total of two breakers. The output of each trip system is provided to both recirculation pump MG drive motor field breakers.

#### BASES (continued)

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY To aid in preserving the integrity of the fuel cladding following events in which a scram does not, but should, occur. Based on its contribution to the reduction of overall plant risk, however, the instrumentation meets Criterion 4 of 10 CFR 50.36(c)(2)(ii).

> The OPERABILITY of the ATWS-RPT is dependent on the OPERABILITY of the individual instrumentation channel Functions. Each Function must have a required number of OPERABLE channels in each trip system, with their setpoints within the specified Allowable Value of SR 3.3.4.1.4. The actual setpoint is calibrated consistent with applicable setpoint methodology assumptions. Channel OPERABILITY also includes the associated recirculation pump drive motor breakers.

Allowable Values are specified for each ATWS-RPT Function specified in the LCO. Nominal trip setpoints are specified in the setpoint calculations. The nominal setpoints are selected to ensure that the setpoints do not exceed the Allowable Value between CHANNEL CALIBRATIONS. Operation with a trip setpoint less conservative than the nominal trip setpoint. but within its Allowable Value, is acceptable. A channel is inoperable if its actual trip setpoint is not within its required Allowable Value. Trip setpoints are those predetermined values of output at which an action should take place. The setpoints are compared to the actual process parameter (e.g., reactor vessel water level), and when the measured output value of the process parameter exceeds the setpoint, the associated device (e.g., trip unit) changes state. The analytic limits are derived from the limiting values of the process parameters obtained from the ATWS analysis (Ref. 2). The trip setpoints are determined from the analytic limits, corrected for defined process, calibration, and instrument errors. The Allowable Values are then determined, based on the trip setpoint values. by accounting for the calibration based errors. These calibration based errors are limited to reference accuracy, instrument drift, errors associated with measurement and test equipment. and calibration tolerance of loop components. The trip setpoints and Allowable Values determined in this manner provide adequate protection

APPLICABLEbecause instrument uncertainties, process effects,SAFETY ANALYSES,calibration tolerances, instrument drift, and severeLCO, andenvironment errors (for channels that must function in harshAPPLICABILITYenvironments as defined by 10 CFR 50.49) are accounted for(continued)and appropriately applied for the instrumentation.

The individual Functions are required to be OPERABLE in MODE 1 to protect against common mode failures of the Reactor Protection System by providing a diverse trip to mitigate the consequences of a postulated ATWS event. The Reactor Vessel Steam Dome Pressure-High and Reactor Vessel Water Level - Low Low Functions are required to be OPERABLE in MODE 1. since the reactor is producing significant power and the recirculation system could be at high flow. During this MODE, the potential exists for pressure increases or low water level, assuming an ATWS event. In MODE 2, the reactor is at low power and the recirculation system is at low flow: thus, the potential is low for a pressure increase or low water level, assuming an ATWS event. Therefore, the ATWS-RPT is not necessary. In MODES 3 and 4, the reactor is shut down with all control rods inserted; thus, an ATWS event is not significant and the possibility of a significant pressure increase or low water level is negligible. In MODE 5, the one rod out interlock ensures that the reactor remains subcritical: thus, an ATWS event is not significant. In addition, the reactor pressure vessel (RPV) head is not fully tensioned and no pressure transient threat to the reactor coolant pressure boundary (RCPB) exists.

The specific Applicable Safety Analyses and LCO discussions are listed below on a Function by Function basis.

#### a. <u>Reactor Vessel Water Level-Low Low</u>

Low RPV water level indicates the capability to cool the fuel may be threatened. Should RPV water level decrease too far, fuel damage could result. Therefore, the ATWS-RPT System is initiated at low low RPV water level to aid in maintaining level above the top of the active fuel. The reduction of core flow reduces the neutron flux and THERMAL POWER and, therefore, the rate of coolant boiloff.

(continued)

APPLICABLE	a.	<u>Reactor Vessel Water Level-Low Low</u> (continued)
SAFETY ANALYSES, LCO, and APPLICABILITY		Reactor vessel water level signals are initiated from four differential pressure transmitters that sense the difference between the pressure due to a constant column of water (reference leg) and the pressure due to the actual water level (variable leg) in the vessel.
		Four channels of Reactor Vessel Water Level-Low Low,

Four channels of Reactor with two channels in each trip system. are available and required to be OPERABLE to ensure that no single instrument failure can preclude an ATWS-RPT from this Function on a valid signal. Each channel includes a time delay relay which delays the Reactor Vessel Water Level-Low Low Function channel output signal from providing input to the associated trip system. The Reactor Vessel Water Level-Low Low Allowable Value is chosen so that the system will not be initiated after a reactor vessel water level scram with feedwater still available, and for convenience with the high pressure coolant injection initiation. The Reactor Vessel Water Level-Low Low Function trip is delayed since there is an insignificant affect on the ATWS consequences and it is desirable to avoid making the consequences of a loss of coolant accident more severe.

# b. Reactor Vessel Steam Dome Pressure-High

Excessively high RPV pressure may rupture the RCPB. An increase in the RPV pressure during reactor operation compresses the steam voids and results in a positive reactivity insertion. This increases neutron flux and THERMAL POWER, which could potentially result in fuel failure and overpressurization. The Reactor Vessel Steam Dome Pressure - High Function initiates an RPT for transients that result in a pressure increase, counteracting the pressure increase by rapidly reducing core power generation. For the overpressurization event, the RPT aids in the termination of the ATWS event and, along with the

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY	b.	<u>Reactor Vessel Steam Dome Pressure-High</u> (continued)
		safety valves, limits the peak RPV pressure to less than the ASME Section III Code Service Level C limits (1500 psig).
		The Reactor Vessel Steam Dome Pressure-High signals are initiated from four pressure transmitters that monitor reactor vessel steam dome pressure. Four channels of Reactor Vessel Steam Dome Pressure-High, with two channels in each trip system, are available and are required to be OPERABLE to ensure that no single instrument failure can preclude an ATWS-RPT from this Function on a valid signal. The Reactor Vessel Steam Dome Pressure-High Allowable Value is chosen to provide an adequate margin to the ASME Section III Code Service Level C allowable Reactor Coolant System pressure.

A Note has been provided to modify the ACTIONS related to ACTIONS ATWS-RPT instrumentation channels. Section 1.3, Completion Times, specifies that once a Condition has been entered, subsequent divisions, subsystems, components, or variables expressed in the Condition, discovered to be inoperable or not within limits, will not result in separate entry into the Condition. Section 1.3 also specifies that Required Actions of the Condition continue to apply for each additional failure, with Completion Times based on initial entry into the Condition. However, the Required Actions for inoperable ATWS-RPT instrumentation channels provide appropriate compensatory measures for separate inoperable channels. As such, a Note has been provided that allows separate Condition entry for each inoperable ATWS-RPT instrumentation channel.

# A.1 and A.2

With one or more channels inoperable, but with ATWS-RPT trip capability for each Function maintained (refer to Required Actions B.1 and C.1 Bases), the ATWS-RPT System is capable of performing the intended function. However, the

### ACTIONS <u>A.1 and A.2</u> (continued)

reliability and redundancy of the ATWS-RPT instrumentation is reduced, such that a single failure in the remaining trip system could result in the inability of the ATWS-RPT System to perform the intended function. Therefore, only a limited time is allowed to restore the inoperable channels to OPERABLE status. Because of the diversity of sensors available to provide trip signals, the low probability of extensive numbers of inoperabilities affecting all diverse Functions, and the low probability of an event requiring the initiation of ATWS-RPT, 14 days is provided to restore the inoperable channel (Required Action A.1). Alternately, the inoperable channel may be placed in trip (Required Action A.2), since this would conservatively compensate for the inoperability, restore capability to accommodate a single failure, and allow operation to continue. As noted, placing the channel in trip with no further restrictions is not allowed if the inoperable channel is the result of an inoperable breaker, since this may not adequately compensate for the inoperable breaker (e.g., the breaker may be inoperable such that it will not open). If it is not desired to place the channel in trip (e.g., as in the case where placing the inoperable channel in trip would result in an RPT), or if the inoperable channel is the result of an inoperable breaker, Condition D must be entered and its Required Actions taken.

## <u>B.1</u>

Required Action B.1 is intended to ensure that appropriate actions are taken if multiple, inoperable, untripped channels within the same Function result in the Function not maintaining ATWS-RPT trip capability. A Function is considered to be maintaining ATWS-RPT trip capability when sufficient channels are OPERABLE or in trip such that the ATWS-RPT System will generate a trip signal from the given Function on a valid signal, and both recirculation pumps can be tripped. This requires two channels of the Function in the same trip system to each be OPERABLE or in trip, and the recirculation pump drive motor breakers to be OPERABLE or in trip.

#### ACTIONS <u>B.1</u> (continued)

The 72 hour Completion Time is sufficient for the operator to take corrective action (e.g., restoration or tripping of channels) and takes into account the likelihood of an event requiring actuation of the ATWS-RPT instrumentation during this period and that one Function is still maintaining ATWS-RPT trip capability.

### <u>C.1</u>

Required Action C.1 is intended to ensure that appropriate Actions are taken if multiple, inoperable, untripped channels within both Functions result in both Functions not maintaining ATWS-RPT trip capability. The description of a Function maintaining ATWS-RPT trip capability is discussed in the Bases for Required Action B.1 above.

The 1 hour Completion Time is sufficient for the operator to take corrective action and takes into account the likelihood of an event requiring actuation of the ATWS-RPT instrumentation during this period.

## D.1 and D.2

With any Required Action and associated Completion Time not met, the plant must be brought to a MODE or other specified condition in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 2 within 6 hours (Required Action D.2). Alternately, the associated recirculation pump may be removed from service since this performs the intended function of the instrumentation (Required Action D.1). The allowed Completion Time of 6 hours is reasonable, based on operating experience, both to reach MODE 2 from full power conditions and to remove a recirculation pump from service in an orderly manner and without challenging plant systems.

SURVEILLANCE The Surveillances are modified by a Note to indicate that REQUIREMENTS when a channel is placed in an inoperable status solely for performance of required Surveillances, entry into the

SURVEILLANCE REQUIREMENTS (continued) associated Conditions and Required Actions may be delayed for up to 6 hours provided the associated Function maintains ATWS-RPT trip capability. Upon completion of the Surveillance, or expiration of the 6 hour allowance, the channel must be returned to OPERABLE status or the applicable Condition entered and Required Actions taken. This Note is based on the reliability analysis (Ref. 3) assumption of the average time required to perform channel Surveillance. That analysis demonstrated that the 6 hour testing allowance does not significantly reduce the probability that the recirculation pumps will trip when necessary.

## SR 3.3.4.1.1

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

Agreement criteria are determined by the plant 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 instrument has drifted outside its limit.

The Frequency is based upon 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 required channels of this LCO.

SURVEILLANCE

SR 3.3.4.1.2

REQUIREMENTS (continued) Calibration of trip units provides a check of the actual trip setpoints. The channel must be declared inoperable if the trip setting is discovered to be less conservative than the Allowable Value specified in SR 3.3.4.1.4. If the trip setting is discovered to be less conservative than the setting accounted for in the appropriate setpoint methodology, but is not beyond the Allowable Value, the channel performance is still within the requirements of the ATWS analysis. Under these conditions, the setpoint must be readjusted to be equal to or more conservative than accounted for in the appropriate setpoint methodology.

> The Frequency of 92 days is based on engineering judgement and the reliability of these components.

## SR 3.3.4.1.3

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the channel will perform the intended function. A successful test of the required contact(s) of a channel relay may be performed by the verification of the change of state of a single contact of the relay. This clarifies what is an acceptable CHANNEL FUNCTIONAL TEST of a relay. This is acceptable because all of the other required contacts of the relay are verified by other Technical Specifications and non-Technical Specifications tests at least once per refueling interval with applicable extensions. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology.

The Frequency of 92 days is based on the reliability analysis of Reference 3.

## SR 3.3.4.1.4

A CHANNEL CALIBRATION is a complete check of the instrument loop and the sensor, including the time delay relays associated with the Reactor Vessel Water Level-Low Low Function. This test verifies the channel responds to the

(continued)

SURVEILLANCE REQUIREMENTS	<u>SR_3.3.4.1.4</u> (continued)
	measured parameter within the necessary range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations consistent with the plant specific setpoint methodology.
	The Frequency is based upon the assumption of a 24 month calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis.
	<u>SR_3.3.4.1.5</u>
	The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required trip logic for a specific channel. The system functional test of the pump breakers is included as part of this Surveillance and overlaps the LOGIC SYSTEM FUNCTIONAL TEST to provide complete testing of the assumed safety function. Therefore, if a breaker is incapable of operating, the associated instrument channel(s) would be inoperable.
	The 24 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown these components usually pass the Surveillance when performed at the 24 month Frequency.
REFERENCES	1. UFSAR, Section 7.8.
	2. UFSAR, Section 15.8
	<ol> <li>GENE-770-06-1-A, "Bases for Changes To Surveillance Test Intervals and Allowed Out-of-Service Times For Selected Instrumentation Technical Specifications," December 1992.</li> </ol>

#### B 3.3 INSTRUMENTATION

B 3.3.5.1 Emergency Core Cooling System (ECCS) Instrumentation

#### BASES

BACKGROUND The purpose of the ECCS instrumentation is to initiate appropriate responses from the systems to ensure that the fuel is adequately cooled in the event of a design basis accident or transient.

> For most anticipated operational occurrences and Design Basis Accidents (DBAs), a wide range of dependent and independent parameters are monitored.

The ECCS instrumentation actuates core spray (CS), low pressure coolant injection (LPCI), high pressure coolant injection (HPCI), Automatic Depressurization System (ADS), and the diesel generators (DGs). The equipment involved with each of these systems is described in the Bases for LCO 3.5.1, "ECCS-Operating" and LCO 3.8.1, "AC Sources-Operating."

## <u>Core Spray System</u>

The CS System may be initiated by either automatic or manual means, although manual initiation requires manipulation of individual pump and valve control switches. Automatic initiation occurs for conditions of Reactor Vessel Water Level-Low Low (coincident with Reactor Steam Dome Pressure - Low (Permissive) or Drywell Pressure - High. The Reactor Vessel Water Level - Low Low variable is monitored by four redundant differential pressure transmitters, which are. in turn. connected to four trip units and the Drywell Pressure-High variable is monitored by four pressure switches. The output of each trip unit and switch is connected to relays whose contacts input into two trip systems. Each trip system is arranged in a one-out-of-two taken twice logic for each Function. The Reactor Steam Dome Pressure-Low (Permissive) variable is monitored by two redundant pressure switches. The output of each switch is connected to relays whose contacts input into two trip systems. Each trip system is arranged in a one-out-of-two logic. Each trip system will delay CS pump start logic on low low reactor vessel water level until reactor steam dome

# BACKGROUND <u>Core Spray System</u> (continued)

pressure has fallen to a value below the CS System's maximum design pressure. The CS pumps start logic will receive the high drywell pressure signals without delay, however, the opening of the injection valves will be delayed for both Functions. Each trip system will start one CS pump and provide signals to the associated CS subsystem valves. Each CS subsystem also receives an ADS initiation signal.

Upon receipt of an initiation signal, the CS pumps are started immediately if offsite power is available, otherwise the CS pumps start in approximately 14 seconds after AC power is available from the DG.

The CS test line isolation valve, which is also a primary containment isolation valve (PCIV), is closed on a CS initiation signal to allow full system flow assumed in the accident analyses and maintain primary containment isolated in the event CS is not operating.

The CS pump discharge flow is monitored by a flow transmitter. When the pump is running and discharge flow is low enough so that pump overheating may occur, the minimum flow return line valve is opened. The valve is automatically closed if flow is above the minimum flow setpoint to allow the full system flow assumed in the accident analysis.

#### Low Pressure Coolant Injection System

The LPCI subsystems may be initiated by automatic or manual means, although manual initiation requires manipulation of individual pump and valve control switches. Automatic initiation occurs for conditions of Reactor Vessel Water Level-Low Low coincident with Reactor Steam Dome Pressure-Low (Permissive) or Drywell Pressure-High. The Reactor Vessel Water Level-Low Low variable is monitored by four redundant differential pressure transmitters, which, in turn, are connected to four trip units and the Drywell Pressure-High variable is monitored by four redundant pressure switches. The output of each trip unit and switch is connected to relays whose contacts are input into two

# BACKGROUND Low Pressure Coolant Injection System (continued)

trip systems. Each trip system is arranged in a one-out-of-two taken twice logic for each Function. The Reactor Steam Dome Pressure-Low (Permissive) variable is monitored by two redundant pressure switches. The output of each switch is connected to relays whose contacts input into two trip systems. Each trip system is arranged in a oneout-of-two logic. Each trip system will delay LPCI pump start logic on low low reactor vessel water level until reactor steam dome pressure has fallen to a value below the LPCI System's maximum design pressure. The LPCI pumps start logic will receive the high drywell pressure signals without delay, however, the opening of the injection valves will be delayed for both Functions. Each trip system will start the associated LPCI pumps and provide signals to the associated LPCI valves. Each LPCI subsystem also receives an ADS initiation signal.

Upon receipt of an initiation signal, the LPCI A and C pumps start immediately if offsite power is available, otherwise the pumps start approximately 4 seconds after AC power available from the associated DG. LPCI B and D pumps start immediately if offsite power is available, otherwise the pumps are started after approximately a 9 second delay after AC power from the associated DG is available. This time delay limits the loading of the standby power sources.

Each LPCI subsystem's discharge flow is monitored by a flow transmitter. When a pump is running and discharge flow is low enough so that pump overheating may occur, the respective minimum flow return line valve is opened.

The LPCI test line suppression pool cooling isolation valve, suppression pool spray isolation valves, and containment spray isolation valves (which are also PCIVs) are also closed on a LPCI initiation signal to allow the full system flow assumed in the accident analyses and maintain primary containment isolated in the event LPCI is not operating.

# BACKGROUND Low Pressure Coolant Injection System (continued)

The LPCI System initiation logic also contains LPCI Loop Select Logic whose purpose is to identify and direct LPCI flow to the unbroken recirculation loop if a Design Basis Accident (DBA) occurs. The LPCI Loop Select Logic is initiated upon the receipt of either a LPCI Reactor Vessel Water Level-Low Low signal or a LPCI Drywell Pressure-High signal, as discussed previously. When initiated, the LPCI Loop Select Logic first determines recirculation pump operation by sensing the differential pressure (dp) between the suction and discharge of each pump. There are four dp switches monitoring each recirculation loop which are, in turn, connected to relays whose contacts are connected to two trip systems. The dp switches will trip when the dp across the pump is approximately 2 psid. The contacts are arranged in a one-out-of-two taken twice logic for each recirculation pump. If the logic senses that either pump is not running, i.e., single loop operation, then a trip signal is sent to both recirculation pumps to eliminate the possibility of pipe breaks being masked by the operating recirculation pump pressure. However, the pump trip signal is delayed approximately 0.5 seconds (one time delay relay per trip system) to ensure that at least one pump is off since the break detection sensitivity is greater with both pumps running. If a pump trip signal is generated, reactor steam dome pressure must drop to a specified value before the logic will continue. This adjusts the selection time to optimize sensitivity and still ensure that LPCI injection is not unnecessarily delayed. The reactor steam dome pressure is sensed by four pressure switches which in turn are connected to relays whose contacts are connected to two trip systems. The contacts are arranged in a one-out-of-two taken twice logic. After the satisfaction of this pressure requirement or if both recirculation pumps indicate they are running, a 2 second time delay is provided to allow momentum effects to establish the maximum differential pressure for loop selection. Selection of the unbroken recirculation loop is then initiated. This is done by comparing the absolute pressure of the two recirculation riser loops. The broken loop is indicated by a lower pressure than the unbroken loop. The loop with the higher pressure is then used for LPCI injection. If, after a small time delay of approximately 0.5 seconds (one time delay relay per trip system), the pressure in loop A is not indicating

# BACKGROUND Low Pressure Coolant\_Injection\_System (continued)

higher than loop B, the logic will provide a signal to close the B recirculation loop discharge valve, open the LPCI injection valve to the B recirculation loop and close the LPCI injection valve to the A recirculation loop. This is the "default" choice in the LPCI Loop Select Logic. If recirculation loop A pressure indicates higher than loop B pressure, approximately 2 psig, the recirculation discharge valve in loop A is closed, the LPCI injection valve to loop A is signaled to open and the LPCI injection valve to loop B is signaled to close. The four dp switches which provide input to this portion of the logic detect the pressure difference between the corresponding risers to the jet pumps in each recirculation loop. The four dp switches are connected to relays whose contacts are connected to two trip systems. The contacts in each trip system are arranged in a one-out-of-two taken twice logic. There are two redundant trip systems in the LPCI Loop Select Logic. The complete logic in each trip system must actuate for operation of the LPCI Loop Select Logic.

# High Pressure Coolant Injection System

The HPCI System may be initiated by either automatic or manual means. Automatic initiation occurs for conditions of Reactor Vessel Water Level-Low Low or Drywell Pressure-High. The Reactor Vessel Water Level-Low Low variable is monitored by four redundant differential pressure transmitters, which are, in turn, connected to four trip units and the Drywell Pressure-High variable is monitored by four redundant pressure switches. The output of each trip unit and switch is connected to relays whose contacts are arranged in a one-out-of-two taken twice logic for each Function. The logic can also be initiated by use of a Manual Initiation push button.

The HPCI pump discharge flow is monitored by a flow switch. When the pump is running and discharge flow is low enough so that pump overheating may occur, the minimum flow return line valve is opened.

# BACKGROUND High Pressure Coolant Injection System (continued)

The HPCI full flow test line isolation valves are closed upon receipt of a HPCI initiation signal to allow the full system flow assumed in the accident analysis.

The HPCI System also monitors the water levels in the two contaminated condensate storage tanks (CCSTs) and the unit suppression pool because these are the two types of sources of water for HPCI operation. Reactor grade water in the CCSTs is the normal source and the HPCI System is normally aligned to both CCSTs. Upon receipt of a HPCI initiation signal, the CCST suction valve is automatically signaled to open (it is normally in the open position) unless both pump suction valves from the suppression pool are open. If the water level in any CCST falls below a preselected level, first the suppression pool suction valves automatically open, and then when the valves are fully open the CCST suction valve automatically closes. Two level switches are used to detect low water level in each CCST. The outputs for these switches are provided to logics of HPCI in both Unit 2 and Unit 3. Any switch can cause the suppression pool suction valves to open and the CCST suction valve to close. The suppression pool suction valves also automatically open and the CCST suction valve closes if high water level is detected in the suppression pool (one-out-of-two logic). To prevent losing suction to the pump, the suction valves are interlocked so that one suction path must be open before the other automatically closes.

The HPCI provides makeup water to the reactor until the reactor vessel water level reaches the Reactor Vessel Water Level - High trip, at which time the HPCI turbine trips, which causes the turbine's stop valve and the pump discharge valve to close. The logic is two-out-of-two to provide high reliability of the HPCI System. The HPCI System automatically restarts if a Reactor Vessel Water Level - Low Low signal is subsequently received.

#### Automatic Depressurization System

The ADS may be initiated by either automatic or manual means, although manual initiation requires manipulation of each individual relief valve control switch. Automatic

# BACKGROUND <u>Automatic Depressurization System</u> (continued)

initiation occurs when signals indicating Reactor Vessel Water Level-Low Low, Drywell Pressure-High, CS or LPCI Pump Discharge Pressure-High are all present and the ADS Initiation Timer has timed out. ADS automatic initiation also occurs when signals indicating Reactor Vessel Water Level - Low Low are present and the ADS Low Low Water Level Actuation Timer times out. However. this initiation occurs since this logic provides a direct initiation of the associated low pressure ECCS pumps, thereby bypassing the CS or LPCI Reactor Steam Dome Pressure (Permissive) channels. After the pumps start the ADS Drywell Pressure-High contacts are effectively bypassed and the above logic is completed after CS or LPCI Pump Discharge Pressure-High channels are actuated and the ADS Initiation Timer has also timed out. There are two differential pressure transmitters for Reactor Vessel Water Level - Low Low and two pressure switches for Drywell Pressure-High, in each of the two ADS trip systems. Each of the transmitters connect to a trip unit. which then drives a relay whose contacts form the initiation logic. Each switch connects to a relay whose contacts also form the initiation logic.

Each ADS trip system includes time delays between satisfying the initiation logic and the actuation of the ADS valves. The ADS Initiation Timer time delay setpoint and the Low Low Water Level Actuation Time Delay Setpoint are chosen to be long enough that the HPCI has sufficient operating time to recover to a level above Low Low, yet not so long that the LPCI and CS Systems are unable to adequately cool the fuel if the HPCI fails to maintain that level. An alarm in the control room is annunciated when either of the timers is timing. Resetting the ADS initiation signals resets the ADS Initiation Timers.

The ADS also monitors the discharge pressures of the four LPCI pumps and the two CS pumps. Each ADS trip system includes two discharge pressure permissive switches from all CS and LPCI pumps. However, only the switches in the associated division are required to be OPERABLE for each trip system (i.e., Division 1 LPCI pumps A and B input to ADS trip system A, and Division 2 LPCI pumps C and D input to ADS trip system B). The signals are used as a permissive

# BACKGROUND <u>Automatic Depressurization System</u> (continued)

for ADS actuation, indicating that there is a source of core coolant available once the ADS has depressurized the vessel. Any one of the six low pressure pumps is sufficient to permit automatic depressurization.

The ADS logic (low low reactor pressure and high drywell pressure) in each trip system is arranged in two strings. Each string has a contact from a Reactor Vessel Water Level-Low Low and Drywell Pressure-High Function channel. In addition, each string receives a contact input of a pressure switch associated with each CS and LPCI pump via the use of auxiliary relays and one string includes the ADS initiation timer. All contacts in both logic strings must close, the ADS initiation timer must time out, and a CS or LPCI pump discharge pressure signal must be present to initiate an ADS trip system. Either the A or B trip system will cause all the ADS relief valves to open. Once the Drywell Pressure-High signal or the ADS initiation signal is present, it is sealed in until manually reset. Both trip strings associated with each ADS logic will also trip if both Reactor Vessel Water Level-Low Low Function channel contacts close, the ADS Low Low Water Level Actuation Timer times out, and a CS or LPCI pump discharge pressure signal is present in each string. This is accomplished since with both Reactor Vessel Water Level-Low Low Function channels tripped and with the ADS Low Low Water Level Actuation Timer timed out the associated low pressure ECCS pumps will receive an initiation signal from this logic, thus bypassing the associated ADS Drywell Pressure-High and CS or LPCI Reactor Steam Dome Pressure (Permissive) Function channels, to start the low pressure ECCS pumps.

A manual inhibit switch is provided in the control room for the ADS; however, its function is not required for ADS OPERABILITY (provided ADS is not inhibited when required to be OPERABLE).

BACKGROUND	<u>Diesel Generators</u>
(continued)	The DGs may be initiated by either automatic or manual means. Automatic initiation occurs for conditions of Reactor Vessel Water Level - Low Low or Drywell Pressure - High. The DGs are also initiated upon loss of voltage signals. (Refer to the Bases for LCO 3.3.8.1, "Loss of Power (LOP) Instrumentation," for a discussion of these signals.) The Reactor Water Level - Low Low variable is monitored by four redundant differential pressure transmitters, which are, in turn, connected to four trip units and the Drywell Pressure - High variable is monitored by four redundant differential pressure transmitters is connected to relays whose contacts are connected to two trip systems. Each trip system is arranged in a one-out-of-two taken twice logic. One trip system starts the unit DG and the other trip system starts the common DG (DG 2/3). The DGs receive their initiation signals from the CS System initiation logic. The DGs can also be started manually from the control room and locally from the associated DG room. Upon receipt of a loss of coolant accident (LOCA) initiation signal, each DG is automatically started, is ready to load in approximately 13 seconds, and will run in standby conditions (rated voltage and speed, with the DG output breaker open). The DGs will only energize their respective Essential Service System (ESS) buses if a loss of offsite power occurs (Refer to Bases for LCO 3.3.8.1).
APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY	The actions of the ECCS are explicitly assumed in the safety analyses of References 1, 2, and 3. The ECCS is initiated to preserve the integrity of the fuel cladding by limiting the post LOCA peak cladding temperature to less than the 10 CFR 50.46 limits.
	ECCS instrumentation satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii). Certain instrumentation Functions are retained for other reasons and are described below in the individual Functions discussion.
	The OPERABILITY of the ECCS instrumentation is dependent upon the OPERABILITY of the individual instrumentation channel Functions specified in Table 3.3.5.1–1. Each
	(continued)

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued) Function must have a required number of OPERABLE channels, with their setpoints within the specified Allowable Values, where appropriate. The actual setpoint is calibrated consistent with applicable setpoint methodology assumptions. Table 3.3.5.1-1, footnote (b), is added to show that certain ECCS instrumentation Functions are also required to be OPERABLE to perform DG initiation.

> Allowable Values are specified for each ECCS Function specified in the Table. Nominal trip setpoints are specified in the setpoint calculations. The nominal setpoints are selected to ensure that the setpoints do not exceed the Allowable Value between CHANNEL CALIBRATIONS. Operation with a trip setpoint less conservative than the nominal trip setpoint, but within its Allowable Value, is acceptable. A channel is inoperable if its actual trip setpoint is not within its required Allowable Value. Trip setpoints are those predetermined values of output at which an action should take place. The setpoints are compared to the actual process parameter (e.g., reactor vessel water level), and when the measured output value of the process parameter exceeds the setpoint, the associated device (e.g., trip unit) changes state. The analytic limits are derived from the limiting values of the process parameters obtained from the safety analysis. The trip setpoints are determined from the analytic limits, corrected for defined process, calibration, and instrument errors. The Allowable Values are then determined, based on the trip setpoint values, by accounting for the calibration based errors. These calibration based errors are limited to reference accuracy, instrument drift, errors associated with measurement and test equipment, and calibration tolerance of loop components. The trip setpoints and Allowable Values determined in this manner provide adequate protection because instrument uncertainties, process effects, calibration tolerances, instrument drift, and severe environment errors (for channels that must function in harsh environments as defined by 10 CFR 50.49) are accounted for and appropriately applied for the instrumentation.

> Some Functions (i.e, Functions 1.c, 1.d, 2.c, 4.d, 4.e, 5.d, and 5.e) have both an upper and lower analytic limit that must be evaluated. The Allowable Values and trip setpoints

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

are derived from both an upper and lower analytic limit using the methodology describe above. Due to the upper and lower analytic limits, Allowable Values of these Functions appear to incorporate a range. However, the upper and lower Allowable Values are unique, with each Allowable Value associated with one unique analytic limit and trip setpoint.

In general, the individual Functions are required to be OPERABLE in the MODES or other specified conditions that may require ECCS (or DG) initiation to mitigate the consequences of a design basis transient or accident. To ensure reliable ECCS and DG function, a combination of Functions is required to provide primary and secondary initiation signals.

The specific Applicable Safety Analyses, LCO, and Applicability discussions are listed below on a Function by Function basis.

## Core Spray and Low Pressure Coolant Injection Systems

# 1.a, 2.a. Reactor Vessel Water Level - Low Low

Low reactor pressure vessel (RPV) water level indicates that the capability to cool the fuel may be threatened. Should RPV water level decrease too far, fuel damage could result. The low pressure ECCS and associated DGs are initiated at Low Low to ensure that core spray and flooding functions are available to prevent or minimize fuel damage. The Reactor Vessel Water Level - Low Low is one of the Functions assumed to be OPERABLE and capable of initiating the ECCS during the transients analyzed in References 1 and 3. In addition, the Reactor Vessel Water Level - Low Low Function is directly assumed in the analysis of the recirculation line break (Ref. 2). The core cooling function of the ECCS, along with the scram action of the Reactor Protection System (RPS), ensures that the fuel peak cladding temperature remains below the limits of 10 CFR 50.46.

Reactor Vessel Water Level - Low Low signals are initiated from four differential pressure transmitters that sense the difference between the pressure due to a constant column of water (reference leg) and the pressure due to the actual water level (variable leg) in the vessel.

(continued)

APPLICABLE1.a, 2.a.Reactor Vessel Water Level - Low Low (continued)SAFETY ANALYSES,<br/>LCO, and<br/>APPLICABILITYThe Reactor Vessel Water Level - Low Low Allowable Value is<br/>chosen to allow time for the low pressure core flooding<br/>systems to activate and provide adequate cooling.

Four channels of CS Reactor Vessel Water Level - Low Low Function are only required to be OPERABLE when the CS or DG(s) are required to be OPERABLE to ensure that no single instrument failure can preclude CS and DG initiation. Also, four channels of the LPCI Reactor Vessel Water Level - Low Low Function are only required to be OPERABLE when the LPCI System is required to be OPERABLE to ensure no single instrument failure can preclude LPCI initiation. Refer to LCO 3.5.1 and LCO 3.5.2, "ECCS - Shutdown," for Applicability Bases for the low pressure ECCS subsystems; LCO 3.8.1, "AC Sources - Operating"; and LCO 3.8.2, "AC Sources - Shutdown," for Applicability Bases for the DGs.

# 1.b, 2.b. Drywell Pressure-High

High pressure in the drywell could indicate a break in the reactor coolant pressure boundary (RCPB). The low pressure ECCS and associated DGs are initiated upon receipt of the Drywell Pressure-High Function in order to minimize the possibility of fuel damage. The Drywell Pressure-High Function, along with the Reactor Water Level-Low Low Function, is directly assumed in the small break LOCA analysis (Ref. 4). The core cooling function of the ECCS, along with the scram action of the RPS, ensures that the fuel peak cladding temperature remains below the limits of 10 CFR 50.46.

High drywell pressure signals are initiated from four pressure switches that sense drywell pressure. The Allowable Value was selected to be as low as possible and be indicative of a LOCA inside primary containment.

The Drywell Pressure-High Function is required to be OPERABLE when the ECCS or DG is required to be OPERABLE in conjunction with times when the primary containment is required to be OPERABLE. Thus, four channels of the CS Drywell Pressure-High Function are required to be

# 1.b, 2.b. Drywell Pressure - High (continued)

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

OPERABLE in MODES 1, 2, and 3 to ensure that no single instrument failure can preclude CS and DG initiation. Also, four channels of the LPCI Drywell Pressure-High Function are required to be OPERABLE in MODES 1, 2, and 3 to ensure no single instrument failure can preclude LPCI initiation. In MODES 4 and 5, the Drywell Pressure-High Function is not required, since there is insufficient energy in the reactor to pressurize the primary containment to Drywell Pressure-High setpoint. Refer to LCO 3.5.1 for Applicability Bases for the low pressure ECCS subsystems and to LCO 3.8.1 for Applicability Bases for the DGs.

### 1.c, 2.c. Reactor Steam Dome Pressure - Low (Permissive)

Low reactor steam dome pressure signals are used as permissives for the low pressure ECCS subsystems. This ensures that, prior to opening the injection valves of the low pressure ECCS subsystems, the reactor pressure has fallen to a value below these subsystems maximum design pressure. The channels also delay CS and LPCI pump starts on Reactor Vessel Water Level-Low Low until reactor steam dome pressure is below the setpoint. The Reactor Steam Dome Pressure-Low (Permissive) is one of the Functions assumed to be OPERABLE and capable of permitting initiation of the ECCS during the transients analyzed in References 1 and 3. In addition, the Reactor Steam Dome Pressure-Low Function is directly assumed in the analysis of the recirculation line break (Ref. 2). The core cooling function of the ECCS, along with the scram action of the RPS, ensures that the fuel peak cladding temperature remains below the limits of 10 CFR 50.46.

The Reactor Steam Dome Pressure - Low (Permissive) signals are initiated from two pressure switches that sense the reactor steam dome pressure.

The Allowable Value is low enough to prevent overpressuring the equipment in the low pressure ECCS, but high enough to ensure that the ECCS injection prevents the fuel peak cladding temperature from exceeding the limits of 10 CFR 50.46.

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY	<u>1.c, 2.c. Reactor Steam Dome Pressure-Low (Permissive)</u> (continued)
	Two channels of Reactor Steam Dome Pressure-Low Function are only required to be OPERABLE when the ECCS is required to be OPERABLE to ensure that no single instrument failure can preclude ECCS initiation. Refer to LCO 3.5.1 and LCO 3.5.2 for Applicability Bases for the low pressure ECCS subsystems.

# <u>1.d, 2.f. Core Spray and Low Pressure Coolant Injection</u> Pump Discharge Flow-Low (Bypass)

The minimum flow instruments are provided to protect the associated low pressure ECCS pump from overheating when the pump is operating and the associated injection valve is not sufficiently open. The minimum flow line valve is opened when low flow is sensed, and the valve is automatically closed when the flow rate is adequate to protect the pump. The CS Pump Discharge Flow-Low (Bypass) Function is assumed to be OPERABLE and capable of closing the minimum flow valves to ensure that the CS flow assumed during the transients and accidents analyzed in References 1, 2, and 3 is met. The LPCI Pump Discharge Flow-Low (Bypass) Function is only required to be OPERABLE for opening since the LPCI minimum flow valves are assumed to remain open during the transients and accidents analyzed in References 1, 2, and 3. The core cooling function of the ECCS, along with the scram action of the RPS. ensures that the fuel peak cladding temperature remains below the limits of 10 CFR 50.46.

One flow transmitter per CS pump and one flow transmitter per LPCI subsystem are used to detect the associated subsystems' flow rates. The logic is arranged such that each transmitter causes its associated minimum flow valve to open when flow is low with the pump running. The logic will close the minimum flow valve once the closure setpoint is exceeded. The Pump Discharge Flow-Low (Bypass) Allowable Values are high enough to ensure that the pump flow rate is sufficient to protect the pump. The Core Spray Discharge Flow-Low (Bypass) Allowable Value is also low enough to ensure that the closure of the minimum flow valve is initiated to allow full flow into the core. For LPCI, the closure of the minimum flow valves is not credited.

APPLICABLE	<u>1.d, 2.f. Core Spray and Low Pressure Coolant Injection</u>
SAFETY ANALYSES,	
LCO, and	
APPLICABILITY	Each channel of Pump Discharge Flow-Low (Bypass) Function
	(two CS channels and two LPCI channels) is only required to
	be OPERABLE when the associated ECCS is required to be
	OPERABLE to ensure that no single instrument failure can
	preclude the ECCS function. Refer to LCO 3.5.1 and
	LCO 3.5.2 for Applicability Bases for the low pressure ECCS
	subsystems.
	1 e 2 e Core Spray and Low Pressure Coolant Injection

#### <u>1.e. 2.e. Core Spray and Low Pressure Coolant Injection</u> <u>Pump Start-Time Delay Relay</u>

The purpose of this time delay is to stagger the start of CS and LPCI pumps that are in each of Divisions 1 and 2, thus limiting the starting transients on the 4160 V ESS buses. This Function is only necessary when power is being supplied from the standby power sources (DG). The CS and LPCI Pump Start-Time Delay Relays are assumed to be OPERABLE in the accident and transient analyses requiring ECCS initiation. That is, the analyses assume that the pumps will initiate when required and excess loading will not cause failure of the power sources.

There are two CS Pump Start - Time Delay Relays and two LPCI Pump Start - Time Delay Relays, one for each CS pump and one for LPCI pump B and D. While each time delay relay is dedicated to a single pump start logic, a single failure of a LPCI Pump Start - Time Delay Relay could result in the failure of the three low pressure ECCS pumps, powered from the same ESS bus, to perform their intended function (e.g., as in the case where both ECCS pumps on one ESS bus start simultaneously due to an inoperable time delay relay). This still leaves three of the six low pressure ECCS pumps OPERABLE; thus, the single failure criterion is met (i.e., loss of one instrument does not preclude ECCS initiation). The Allowable Values for the CS and LPCI Pump Start - Time Delay Relays are chosen to be short enough so that ECCS operation is not degraded.

Each CS and LPCI Pump Start-Time Delay Relay Function is required to be OPERABLE only when the associated LPCI subsystem is required to be OPERABLE. Refer to LCO 3.5.1 and LCO 3.5.2 for Applicability Bases for the CS and LPCI subsystems.

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

# 2.d. 2.j. Reactor Steam Dome Pressure - Low (Break S, Detection) and Reactor Steam Dome Pressure Time Delay-Relay (Break Detection)

The purpose of the Reactor Steam Dome Pressure - Low (Break Detection) and Reactor Steam Dome Pressure Time Delay-Relay (Break Detection) Functions are to optimize the LPCI Loop Select Logic sensitivity if the logic previously actuated recirculation pump trips. This is accomplished by preventing the logic from continuing on to the unbroken loop selection activity until reactor steam dome pressure has dropped below a specified value. These Functions are only required to be OPERABLE for the DBA LOCA analysis, i.e., if the break location is in the recirculation system suction piping (Ref. 2). For a DBA LOCA, the analysis assumes that the LPCI Loop Select Logic successfully identifies and directs LPCI flow to the unbroken recirculation loop so that core reflooding is accomplished in time to ensure that the fuel peak cladding temperature remains below the limits of 10 CFR 50.46. For other LOCA events, (i.e., non-DBA recirculation system pipe breaks), or other RPV pipe breaks the success of the Loop Select Logic is less critical than for the DBA.

Reactor Steam Dome Pressure - Low (Break Detection) signals are initiated from four pressure switches that sense the reactor steam dome pressure. Reactor Steam Dome Pressure Time Delay - Relay (Break Detection) signals are initiated from two time delay relays.

The Reactor Steam Dome Pressure - Low (Break Detection) Allowable Value is chosen to allow for coastdown of any recirculation pump which has just tripped, this optimizes the sensitivity of the LPCI Loop Select Logic while ensuring that LPCI injection is not delayed. The Reactor Steam Dome Pressure Time Delay - Relay (Break Detection) Allowable Value is chosen to allow momentum effects to establish the maximum differential pressure for break detection.

Four channels of the Reactor Steam Dome Pressure - Low (Break Detection) Function and two channels of the Reactor Steam Dome Pressure Time Delay-Relay (Break Detection) Function are only required to be OPERABLE in MODES 1, 2, and 3 to ensure that no single failure can prevent the LPCI Loop

<u>2.d, 2.j. Reactor Steam Dome Pressure-Low (Break</u> APPLICABLE Detection) and Reactor Steam Dome Pressure Time Delay-Relay SAFETY ANALYSES. (Break Detection) (continued) ICO. and APPLICABILITY Select Logic from successfully selecting the unbroken recirculation loop for LPCI injection. These Functions are not required to be OPERABLE in MODES 4 and 5 because, in those MODES, the loop for selection is controlled by plant operating procedures which ensure an OPERABLE LPCI flow path. 2.g, 2.i. Recirculation Pump Differential Pressure - High (Break Detection) and Recirculation Pump Differential Pressure Time Delay-Relay (Break Detection) Recirculation Pump Differential Pressure signals are used by the LPCI Loop Select Logic to determine if either

recirculation pump is running. If either pump is not running, i.e., Single Loop Operation, the logic, after a short time delay, sends a trip signal to both recirculation pumps. This is necessary to eliminate the possibility of small pipe breaks being masked by a running recirculation pump. These Functions are only required to be OPERABLE for the DBA LOCA analysis, i.e., if the break location is in the recirculation system suction piping (Ref. 2). For a DBA LOCA, the analysis assumes that the LPCI Loop Select Logic successfully identifies and directs LPCI flow to the unbroken recirculation loop so that core reflooding is accomplished in time to ensure that the fuel peak cladding temperature remains below the limits of 10 CFR 50.46. For other LOCA events (i.e., non-DBA recirculation system pipe breaks or other RPV pipe breaks), the success of the Loop Select Logic is less critical than for the DBA.

Recirculation Pump Differential Pressure-High (Break Detection) signals are initiated from eight differential pressure switches, four of which sense the pressure differential between the suction and discharge of each recirculation pump. Recirculation Pump Differential Pressure Time Delay-Relay (Break Detection) signals are initiated by two time delay relays.

The Recirculation Pump Differential Pressure-High (Break Detection) Allowable Value is chosen to be as low as possible, while still maintaining the ability to

APPLICABLE SAFETY ANALYSES LCO, and APPLICABILITY	2.g. 2.i. Recirculation Pump Differential Pressure - High (Break Detection) and Recirculation Pump Differential Pressure Time Delay - Relay (Break Detection) (continued) differentiate between a running and non-running recirculation pump. Recirculation Pump Differential Pressure Time Delay - Relay (Break Detection) Allowable Value is chosen to allow enough time to determine the status of the operating conditions of the recirculation pumps.
	Eight channels of the Recirculation Pump Differential Pressure - High (Break Detection) Function and two channels of the Recirculation Pump Differential Pressure Time Delay - Relay (Break Detection) Function are only required to be OPERABLE in MODES 1, 2, and 3 to ensure that no single failure can prevent the LPCI Loop Select Logic from successfully determining if either recirculation pump is running. This Function is not required to be OPERABLE in MODES 4 and 5 because, in those MODES, the loop for selection is controlled by plant operating procedures which ensure an OPERABLE LPCI flow path.
	<u>2.h, 2.k. Recirculation Riser Differential Pressure-High</u> <u>(Break Detection) and Recirculation Riser Differential</u> <u>Pressure Time Delay-Relay (Break Detection)</u>
	Recirculation Riser Differential Pressure signals are used by the LPCI Loop Select Logic to determine which, if any, recirculation loop is broken. This is accomplished by comparing the pressure of the two recirculation loops. A broken loop will be indicated by a lower pressure than an unbroken loop. The loop with the higher pressure is then selected, after a short delay, for LPCI injection. If neither loop is broken, the logic defaults to injecting into the "B" recirculation loop. These Functions are only required to be OPERABLE for the DBA LOCA analysis, i.e., if the break location is in the recirculation system suction piping (Ref. 2). For a DBA LOCA, the analysis assumes that the LPCI Loop Select Logic successfully identifies and directs LPCI flow to the unbroken recirculation loop, the analysis assumes that the LPCI Loop Select Logic successfully identifies and directs LPCI flow to the unbroken recirculation loop so that core reflooding is accomplished in time to ensure that the fuel peak cladding

2.h, 2.k. Recirculation Riser Differential Pressure-High APPLICABLE (Break Detection) and Recirculation Riser Differential SAFETY ANALYSES. Pressure Time Delay - Relay (Break Detection) (continued) LCO. and APPLICABILITY temperature remains below the limits of 10 CFR 50.46. For other LOCA events. (i.e., non-DBA recirculation system pipe breaks), or other RPV pipe breaks, the success of the Loop Select Logic is less critical than for the DBA. Recirculation Riser Differential Pressure - High (Break Detection) signals are initiated from four differential pressure switches that sense the pressure differential between the A recirculation loop riser and the B recirculation loop riser. If, after a small time delay, the pressure in loop A is not indicating higher than loop B pressure, the logic will select the B loop for injection. If recirculation loop A pressure is indicating higher than loop B pressure, the logic will select the A loop for LPCI injection. Recirculation Riser Differential Pressure Time Delay-Relay (Break Detection) signals are initiated by two time delay relays. The Recirculation Riser Differential Pressure-High (Break Detection) Allowable Value is chosen to be as low as possible, while still maintaining the ability to differentiate between a broken and unbroken recirculation loop. The Recirculation Riser Differential Pressure Time Delay-Relay (Break Detection) Allowable Value is chosen to provide a sufficient amount of time to determine which loop is broken. Four channels of the Recirculation Riser Differential Pressure-High (Break Detection) Function and two channels of the Recirculation Riser Differential Pressure Time Delay-Relay (Break Detection) Function are only required to be OPERABLE in MODES 1, 2, and 3 to ensure that no single failure can prevent the LPCI Loop Select Logic from successfully selecting the unbroken recirculation loop for LPCI injection. This Function is not required to be OPERABLE in MODES 4 and 5 because, in those MODES, the loop for selection is controlled by plant operating procedures which ensure an OPERABLE LPCI flow path.

BASES

SAFETY ANALYSES, LCO, and APPLICABILITY (continued) Low RPV water level indicates that the capability to cool the fuel may be threatened. Should RPV water level decrea too far, fuel damage could result. Therefore, the HPCI System is initiated at Low Low to maintain level above the top of the active fuel. The Reactor Vessel Water Level-L	
<pre>(continued) Low RPV water level indicates that the capability to cool the fuel may be threatened. Should RPV water level decrea too far, fuel damage could result. Therefore, the HPCI System is initiated at Low Low to maintain level above the</pre>	
Low is one of the Functions assumed to be OPERABLE and capable of initiating HPCI during the transients analyzed References 1 and 3. Additionally, the Reactor Vessel Wate Level - Low Low Function associated with HPCI is directly assumed in the analysis of the recirculation line break (Ref. 2). The core cooling function of the ECCS, along wi the scram action of the RPS, ensures that the fuel peak cladding temperature remains below the limits of 10 CFR 50.46.	in ir
Reactor Vessel Water Level-Low Low signals are initiated from four differential pressure transmitters that sense th difference between the pressure due to a constant column o water (reference leg) and the pressure due to the actual water level (variable leg) in the vessel.	e f
The Reactor Vessel Water Level-Low Low Allowable Value is high enough such that for complete loss of feedwater flow, and assuming no makeup from HPCI, vessel inventory is sufficient to maintain reactor vessel water level above th core.	
Four channels of Reactor Vessel Water Level-Low Low Function are required to be OPERABLE only when HPCI is required to be OPERABLE to ensure that no single instrumen failure can preclude HPCI initiation. Refer to LCO 3.5.1 for HPCI Applicability Bases.	t
<u>3.b. Drywell Pressure – High</u>	
High pressure in the drywell could indicate a break in the RCPB. The HPCI System is initiated upon receipt of the Drywell Pressure-High Function in order to minimize the	:
(continue	<u>d)</u>

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY	<u>3.b. Drywell Pressure-High</u> (continued)
	possibility of fuel damage. The Drywell Pressure-High Function, along with the Reactor Water Level-Low Low Function, is directly assumed in the small break LOCA analysis (Ref. 4). The core cooling function of the ECCS, along with the scram action of the RPS, ensures that the fuel peak cladding temperature remains below the limits of 10 CFR 50.46.
	High drywell pressure signals are initiated from four pressure switches that sense drywell pressure. The Allowable Value was selected to be as low as possible to be indicative of a LOCA inside primary containment.
	Four channels of the Drywell Pressure-High Function are required to be OPERABLE when HPCI is required to be OPERABL to ensure that no single instrument failure can preclude HPCI initiation. Refer to LCO 3.5.1 for the Applicability Bases for the HPCI System.
	<u>3.c. Reactor Vessel Water Level-High</u>
	High RPV water level indicates that sufficient cooling wate inventory exists in the reactor vessel such that there is n danger to the fuel. Therefore, the Reactor Vessel Water Level-High Function signal is used to trip the HPCI turbin to prevent overflow into the main steam lines (MSLs). The Reactor Vessel Water Level-High Function is not assumed in the plant specific accident and transient analyses. It was retained since it is a potentially significant contributor to risk.
	Reactor Vessel Water Level-High signals for HPCI are initiated from two differential pressure transmitters from the medium range water level measurement instrumentation. Both signals are required in order to close the HPCI injection valve. This ensures that no single instrument failure can preclude HPCI initiation. The Reactor Vessel Water Level-High Allowable Value is chosen to prevent flow from the HPCI System from overflowing into the MSLs.

Two channels of Reactor Vessel Water Level-High Function are required to be OPERABLE only when HPCI is required to be OPERABLE. Refer to LCO 3.5.1 for HPCI Applicability Bases.

(continued)

# 3.d. <u>Contaminated Condensate Storage Tank Level-Low</u>

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

Low level in a CCST indicates the unavailability of an adequate supply of makeup water from this normal source. Normally the suction valves between HPCI and the CCSTs are open and, upon receiving a HPCI initiation signal, water for HPCI injection would be taken from the CCSTs. However, if the water levels in the CCSTs fall below a preselected level, first the suppression pool suction valves automatically open, and then the CCST suction valve automatically closes. This ensures that an adequate supply of makeup water is available to the HPCI pump. To prevent losing suction to the pump, the suction valves are interlocked so that the suppression pool suction valves must be open before the CCST suction valve automatically closes. The Function is implicitly assumed in the accident and transient analyses (which take credit for HPCI) since the analyses assume that the HPCI suction source is the suppression pool.

Condensate Storage Tank Level - Low signals are initiated from four level switches (two associated with each CCST). The output from these switches are provided to the logics of both HPCI Systems. The logic is arranged such that any level switch can cause the suppression pool suction valves to open and the CCST suction valve of both units to close. The Contaminated Condensate Storage Tank Level - Low Function Allowable Value is high enough to ensure adequate pump suction head while water is being taken from either CCST.

Four channels (two associated with each CCST) of the Contaminated Condensate Storage Tank Level - Low Function are required to be OPERABLE to ensure that no single instrument failure can preclude HPCI swap to suppression pool source. Refer to LCO 3.5.1 for HPCI Applicability Bases.

## 3.e. Suppression Pool Water Level-High

APPLICABLE SAFETY ANALYSES LCO. and APPLICABILITY (continued)

Excessively high suppression pool water could result in the loads on the suppression pool exceeding design values should there be a blowdown of the reactor vessel pressure through the relief valves. Therefore, signals indicating high suppression pool water level are used to transfer the suction source of HPCI from the CCST to the suppression pool to eliminate the possibility of HPCI continuing to provide additional water from a source outside containment. To prevent losing suction to the pump, the suction valves are interlocked so that the suppression pool suction valves must be open before the CCST suction valve automatically closes.

This Function is implicitly assumed in the accident and transient analyses (which take credit for HPCI) since the analyses assume that the HPCI suction source is the suppression pool.

Suppression Pool Water Level - High signals are initiated from two level switches. The logic is arranged such that either switch can cause the suppression pool suction valves to open and the CCST suction valve to close. The Allowable Value for the Suppression Pool Water Level - High Function is chosen to ensure that HPCI will be aligned for suction from the suppression pool before the water level reaches the point at which suppression pool design loads would be exceeded. The Allowable Value is confirmed by performance of a CHANNEL FUNCTIONAL TEST. This is acceptable since the design layout of the installation ensures the switches will trip at a level lower than the Allowable Value.

Two channels of Suppression Pool Water Level-High Function are required to be OPERABLE only when HPCI is required to be OPERABLE to ensure that no single instrument failure can preclude HPCI swap to suppression pool source. Refer to LCO 3.5.1 for HPCI Applicability Bases.

# <u>3.f. High Pressure Coolant Injection Pump Discharge</u> Flow-Low (Bypass)

The minimum flow instruments are provided to protect the HPCI pump from overheating when the pump is operating and the associated injection valve is not sufficiently open. The minimum flow line valve is opened when low flow is

(continued)

APPLICABLE SAFETY ANALYSES,	<u>3.f. High Pressure Coolant Injection Pump Discharge</u> <u>Flow-Low (Bypass)</u> (continued)
LCO, and APPLICABILITY	sensed, and the valve is automatically closed when the flow rate is adequate to protect the pump. The core cooling function of the ECCS, along with the scram action of the RPS, ensures that the fuel peak cladding temperature remains below the limits of 10 CFR 50.46.
	One flow switch is used to detect the HPCI System's flow rate. The logic is arranged such that the flow switch causes the minimum flow valve to open. The logic will close the minimum flow valve once the closure setpoint is exceeded.
	The High Pressure Coolant Injection Pump Discharge Flow-Low (Bypass) Allowable Value is high enough to ensure that pump flow rate is sufficient to protect the pump.
	One channel is required to be OPERABLE when the HPCI is required to be OPERABLE. Refer to LCO 3.5.1 for HPCI Applicability Bases.
	<u>3.g. Manual Initiation</u>
	The Manual Initiation push button channel introduces signals into the HPCI logic to provide manual initiation capability and is redundant to the automatic protective instrumentation. There is one push button for the HPCI System.
	The Manual Initiation Function is not assumed in any accident or transient analyses in the UFSAR. However, the Function is retained for overall redundancy and diversity of the HPCI function as required by the NRC in the plant licensing basis.
	There is no Allowable Value for this Function since the channel is mechanically actuated based solely on the position of the push button. One channel of the Manual Initiation Function is required to be OPERABLE only when the HPCI System is required to be OPERABLE. Refer to LCO 3.5.1 for HPCI Applicability Bases.
	(continued)

APPLICABLE SAFETY ANALYSES,	Automatic Depressurization System
LCO, and	<u>4.a, 5.a. Reactor Vessel Water Level-Low Low</u>
APPLICABILITY (continued)	Low RPV water level indicates that the capability to cool

the fuel may be threatened. Should RPV water level decrease too far, fuel damage could result. Therefore, ADS receives one of the signals necessary for initiation from this Function. The Reactor Vessel Water Level-Low Low is one of the Functions assumed to be OPERABLE and capable of initiating the ADS during the accident analyzed in Reference 2. The core cooling function of the ECCS, along with the scram action of the RPS, ensures that the fuel peak cladding temperature remains below the limits of 10 CFR 50.46.

Reactor Vessel Water Level - Low Low signals are initiated from four differential pressure transmitters that sense the difference between the pressure due to a constant column of water (reference leg) and the pressure due to the actual water level (variable leg) in the vessel. Four channels of Reactor Vessel Water Level - Low Low Function are required to be OPERABLE only when ADS is required to be OPERABLE to ensure that no single instrument failure can preclude ADS initiation. Two channels input to ADS trip system A, while the other two channels input to ADS trip system B. Refer to LCO 3.5.1 for ADS Applicability Bases.

The Reactor Vessel Water Level-Low Low Allowable Value is chosen to allow time for the low pressure core flooding systems to initiate and provide adequate cooling.

## 4.b. 5.b. Drywell Pressure-High

High pressure in the drywell could indicate a break in the RCPB. Therefore, ADS receives one of the signals necessary for initiation from this Function in order to minimize the possibility of fuel damage. The Drywell Pressure-High is assumed to be OPERABLE and capable of initiating the ADS during the accidents analyzed in Reference 2. The core cooling function of the ECCS, along with the scram action of the RPS, ensures that the fuel peak cladding temperature remains below the limits of 10 CFR 50.46.

(continued)

# APPLICABLE 4.b, 5.b. Drywell Pressure - High (continued)

SAFETY ANALYSES, LCO, and APPLICABILITY APPLICABILITY Drywell Pressure - High signals are initiated from four pressure switches that sense drywell pressure. The Allowable Value was selected to be as low as possible and be indicative of a LOCA inside primary containment.

> Four channels of Drywell Pressure-High Function are only required to be OPERABLE when ADS is required to be OPERABLE to ensure that no single instrument failure can preclude ADS initiation. Two channels input to ADS trip system A, while the other two channels input to ADS trip system B. Refer to LCO 3.5.1 for ADS Applicability Bases.

# <u>4.c. 5.c. Automatic Depressurization System Initiation</u> <u>Timer</u>

The purpose of the Automatic Depressurization System Initiation Timer is to delay depressurization of the reactor vessel to allow the HPCI System time to maintain reactor vessel water level. Since the rapid depressurization caused by ADS operation is one of the most severe transients on the reactor vessel, its occurrence should be limited. By delaying initiation of the ADS Function, the operator is given the chance to monitor the success or failure of the HPCI System to maintain water level, and then to decide whether or not to allow ADS to initiate, to delay initiation further by recycling the timer, or to inhibit initiation permanently. The Automatic Depressurization System Initiation Timer Function is assumed to be OPERABLE for the accident analyses of Reference 2 that require ECCS initiation and assume failure of the HPCI System.

There are two Automatic Depressurization System Initiation Timer relays, one in each of the two ADS trip systems. The Allowable Value for the Automatic Depressurization System Initiation Timer is chosen so that there is still time after depressurization for the low pressure ECCS subsystems to provide adequate core cooling.

Two channels of the Automatic Depressurization System Initiation Timer Function are only required to be OPERABLE

APPLICABLE SAFETY ANALYSES, LCO, and	<u>4.c, 5.c. Automatic Depressurization System Initiation</u> <u>Timer</u> (continued)
APPLICABILITY	when the ADS is required to be OPERABLE to ensure that no single instrument failure can preclude ADS initiation. One channel inputs to ADS trip system A, while the other channel inputs to ADS trip system B. Refer to LCO 3.5.1 for ADS Applicability Bases.

## <u>4.d. 4.e. 5.d. 5.e. Core Spray and Low Pressure Coolant</u> Injection Pump Discharge Pressure-High

The Pump Discharge Pressure - High signals from the CS and LPCI pumps (indicating that the associated pump is running) are used as permissives for ADS initiation, indicating that there is a source of low pressure cooling water available once the ADS has depressurized the vessel. Pump Discharge Pressure - High is one of the Functions assumed to be OPERABLE and capable of permitting ADS initiation during the events analyzed in Reference 2 with an assumed HPCI failure. For these events the ADS depressurizes the reactor vessel so that the low pressure ECCS can perform the core cooling functions. This core cooling function of the ECCS, along with the scram action of the RPS, ensures that the fuel peak cladding temperature remains below the limits of 10 CFR 50.46.

Pump discharge pressure signals are initiated from twelve pressure switches, two on the discharge side of each of the six low pressure ECCS pumps. In order to generate an ADS permissive in one trip system, it is necessary that only one pump (both channels for the pump) indicate the high discharge pressure condition. The Pump Discharge Pressure-High Allowable Value is less than the pump discharge pressure when the pump is operating in a full flow mode and high enough to avoid any condition that results in a discharge pressure permissive when the CS and LPCI pumps are aligned for injection and the pumps are not running. The actual operating point of this function is not assumed in any transient or accident analysis.

Twelve channels of Core Spray and Low Pressure Coolant Injection Pump Discharge Pressure-High Function are only required to be OPERABLE when the ADS is required to be

(continued)

APPLICABLE	<u>4.d, 4.e, 5.d, 5.e. Core Spray and Low Pressure Coolant</u>
SAFETY ANALYSES,	Injection Pump Discharge Pressure - High (continued)
LCO, and	
APPLICABILITY	OPERABLE to ensure that no single instrument failure can preclude ADS initiation. Two CS channels associated with CS pump A and two LPCI channels associated with LPCI pump A and two channels associated with LPCI pump B are required for trip system A. Two CS channels associated with CS pump B and two LPCI channels associated with LPCI pump C and 2 channels associated with LPCI pump D are required for trip system B. Refer to LCO 3.5.1 for ADS Applicability Bases.
	<u>4.f. 5.f. Automatic Depressurization System Low Low Water</u> <u>Level Actuation Timer</u> One of the signals required for ADS initiation is Drywell

Pressure-High. However, if the event requiring ADS initiation occurs outside the drywell (e.g., main steam line break outside containment), a high drywell pressure signal may never be present. Therefore, the Automatic Depressurization System Low Low Water Level Actuation Timer is used to bypass the Drywell Pressure-High Function after a certain time period has elapsed. Operation of the Automatic Depressurization System Low Water Level Actuation Timer Function is not assumed in any plant specific accident analyses or transient analyses. The instrumentation is retained in the TS because ADS is part of the primary success path for mitigation of a DBA.

There are two Automatic Depressurization System Low Low Water Level Actuation Timer relays, one in each of the two ADS trip systems. The Allowable Value for the Automatic Depressurization System Low Low Water Level Actuation Timer is chosen to ensure that there is still time after depressurization for the low pressure ECCS subsystems to provide adequate core cooling.

Two channels of the Automatic Depressurization System Low Water Level Actuation Timer Function are only required to be OPERABLE when the ADS is required to be OPERABLE to ensure that no single instrument failure can preclude ADS initiation. Refer to LCO 3.5.1 for ADS Applicability Bases.

#### BASES (continued)

ACTIONS A Note has been provided to modify the ACTIONS related to ECCS instrumentation channels. Section 1.3, Completion Times, specifies that once a Condition has been entered, subsequent divisions, subsystems, components, or variables expressed in the Condition discovered to be inoperable or not within limits will not result in separate entry into the Condition. Section 1.3 also specifies that Required Actions of the Condition continue to apply for each additional failure, with Completion Times based on initial entry into the Condition. However, the Required Actions for inoperable ECCS instrumentation channels provide appropriate compensatory measures for separate inoperable Condition entry for each inoperable ECCS instrumentation channel.

### <u>A.1</u>

Required Action A.1 directs entry into the appropriate Condition referenced in Table 3.3.5.1-1. The applicable Condition referenced in the table is Function dependent. Each time a channel is discovered inoperable, Condition A is entered for that channel and provides for transfer to the appropriate subsequent Condition.

# B.1, B.2, and B.3

Required Actions B.1 and B.2 are intended to ensure that appropriate actions are taken if multiple, inoperable, untripped channels within the same variable result in redundant automatic initiation capability being lost for the feature(s). Required Action B.1 features would be those that are initiated by Functions 1.a, 1.b, 2.a, 2.b, 2.d and 2.j (i.e., low pressure ECCS and associated DG). The Required Action B.2 system would be HPCI. For Required Action B.1, redundant automatic initiation capability is lost if (a) two or more Function 1.a channels are inoperable and untripped such that both trip systems lose initiation capability, (b) two or more Function 2.a channels are inoperable and untripped such that both trip systems lose initiation capability, (c) two or more Function 1.b channels are inoperable and untripped such that both trip systems lose initiation capability, (d) two or more Function 2.b channels are inoperable and untripped such that both trip

# ACTIONS <u>B.1, B.2, and B.3</u> (continued)

systems lose initiation capability. (e) two or more Function 2.d channels are inoperable and untripped such that both trip systems lose initiation capability, or (f) two Function 2.j channels are inoperable and untripped. For low pressure ECCS, since each inoperable channel would have Required Action B.1 applied separately (refer to ACTIONS Note), each inoperable channel would only require the affected portion of the associated system of low pressure ECCS and DGs to be declared inoperable. However, since channels in both associated low pressure ECCS subsystems (e.g., both CS subsystems) are inoperable and untripped, and the Completion Times started concurrently for the channels in both subsystems, this results in the affected portions in the associated low pressure ECCS and DGs being concurrently declared inoperable. For Required Action B.2, redundant automatic initiation capability (i.e., loss of automatic start capability for Functions 3.a and 3.b) is lost if two Function 3.a or two Function 3.b channels are inoperable and untripped in the same trip system.

In this situation (loss of redundant automatic initiation capability), the 24 hour allowance of Required Action B.3 is not appropriate and the feature(s) associated with the inoperable, untripped channels must be declared inoperable within 1 hour. As noted (Note 1 to Required Action B.1), Required Action B.1 is only applicable in MODES 1, 2, and 3. In MODES 4 and 5, the specific initiation time of the low pressure ECCS is not assumed and the probability of a LOCA is lower. Thus, a total loss of initiation capability for 24 hours (as allowed by Required Action B.3) is allowed during MODES 4 and 5. There is no similar Note provided for Required Action B.2 since HPCI instrumentation is not required in MODES 4 and 5; thus, a Note is not necessary. Notes are also provided (Note 2 to Required Action B.1 and the Note to Required Action B.2) to delineate which Required Action is applicable for each Function that requires entry into Condition B if an associated channel is inoperable. This ensures that the proper loss of initiation capability check is performed.

The Completion Time is intended to allow the operator time to evaluate and repair any discovered inoperabilities. This Completion Time also allows for an exception to the normal

ACTIONS

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

"time zero" for beginning the allowed outage time "clock." For Required Action B.1, the Completion Time only begins upon discovery that a redundant feature in the same system (e.g., both CS subsystems) cannot be automatically initiated due to inoperable, untripped channels within the same Function as described in the paragraph above. For Required Action B.2, the Completion Time only begins upon discovery that the HPCI System cannot be automatically initiated due to two inoperable, untripped channels for the associated variable in the same trip system. The 1 hour Completion Time from discovery of loss of initiation capability is acceptable because it minimizes risk while allowing time for restoration or tripping of channels.

Because of the diversity of sensors available to provide initiation signals and the redundancy of the ECCS design, an allowable out of service time of 24 hours has been shown to be acceptable (Ref. 5) to permit restoration of any inoperable channel to OPERABLE status. If the inoperable channel cannot be restored to OPERABLE status within the allowable out of service time, the channel must be placed in the tripped condition per Required Action B.3. Placing the inoperable channel in trip would conservatively compensate for the inoperability, restore capability to accommodate a single failure, and allow operation to continue. Alternately, if it is not desired to place the channel in trip (e.g., as in the case where placing the inoperable channel in trip would result in an initiation), Condition H must be entered and its Required Action taken.

### <u>C.1 and C.2</u>

Required Action C.1 is intended to ensure that appropriate actions are taken if multiple, inoperable channels within the same variable result in redundant automatic initiation capability being lost for the feature(s). Required Action C.1 features would be those that are initiated by Functions 1.c, 1.e, 2.c, 2.e, 2.g, 2.h, 2.i, and 2.k (i.e., low pressure ECCS). Redundant automatic initiation capability is lost if either (a) two Function 1.c channels are inoperable in both trip systems, (b) two Function 2.c

## ACTIONS <u>C.1 and C.2</u> (continued)

channels are inoperable in both trip systems. (c) two Function 1.e channels are inoperable. (d) two Function 2.e channels are inoperable, (e) two or more Function 2.g channels, associated with a recirculation pump are inoperable such that both trip systems lose initiation capability, (f) two or more Function 2.h channels are inoperable such that both trip systems lose initiation capability. (g) two Function 2.i channels are inoperable, or (h) two Function 2.k channels are inoperable. Since each inoperable channel would have Required Action C.1 applied separately (refer to ACTIONS Note), each inoperable channel would only require the affected portion of the associated system to be declared inoperable. However, since channels for both low pressure ECCS subsystems are inoperable (e.g., both CS subsystems), and the Completion Times started concurrently for the channels in both subsystems, this results in the affected portions in both subsystems being concurrently declared inoperable. For Functions 1.e, and 2.e, the affected portions are the associated low pressure ECCS pumps. For Functions 1.c and 2.c, the affected portions are the associated ECCS pumps and valves. For Functions 2.g, 2.h, 2.i, and 2.k, the affected portions are the associated LPCI valves.

In this situation (loss of redundant automatic initiation capability), the 24 hour allowance of Required Action C.2 is not appropriate and the feature(s) associated with the inoperable channels must be declared inoperable within 1 hour. As noted (Note 1), Required Action C.1 is only applicable in MODES 1, 2, and 3. In MODES 4 and 5, the specific initiation time of the ECCS is not assumed and the probability of a LOCA is lower. Thus, a total loss of automatic initiation capability for 24 hours (as allowed by Required Action C.2) is allowed during MODES 4 and 5.

Note 2 states that Required Action C.1 is only applicable for Functions 1.c, 1.e, 2.c, 2.e, 2.g, 2.h, 2.i, and 2.k. Required Action C.1 is not applicable to Function 3.g (which also requires entry into this Condition if a channel in this Function is inoperable), since it is the HPCI Manual Initiation Function which is not assumed in any accident or transient analysis. Thus, a total loss of HPCI Manual

#### ACTIONS <u>C.1 and C.2</u> (continued)

Initiation capability for 24 hours (as allowed by Required Action C.2) is allowed. Required Action C.1 is also not applicable to Function 3.c (which also requires entry into this Condition if a channel in this Function is inoperable), since the loss of the Function was considered during the development of Reference 5 and considered acceptable for the 24 hours allowed by Required Action C.2.

The Completion Time is intended to allow the operator time to evaluate and repair any discovered inoperabilities. This Completion Time also allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." For Required Action C.1, the Completion Time only begins upon discovery that the same feature in both subsystems (e.g., both CS subsystems) cannot be automatically initiated due to inoperable channels within the same variable as described in the paragraph above. The 1 hour Completion Time from discovery of loss of initiation capability is acceptable because it minimizes risk while allowing time for restoration of channels.

Because of the diversity of sensors available to provide initiation signals and the redundancy of the ECCS design, an allowable out of service time of 24 hours has been shown to be acceptable (Ref. 5) to permit restoration of any inoperable channel to OPERABLE status. If the inoperable channel cannot be restored to OPERABLE status within the allowable out of service time, Condition H must be entered and its Required Action taken. The Required Actions do not allow placing the channel in trip since this action would either cause the initiation or it would not necessarily result in a safe state for the channel in all events.

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

Required Action D.1 is intended to ensure that appropriate actions are taken if multiple, inoperable, untripped channels within the same Function result in a complete loss of automatic component initiation capability for the HPCI System. If both CCSTs are available, HPCI automatic initiation capability is lost if four Function 3.d channels

#### BASES

# ACTIONS <u>D.1, D.2.1, and D.2.2</u> (continued)

are inoperable and untripped. If the opposite unit CCST is not available, automatic initiation capability is lost if two unit channels are inoperable and untripped. HPCI automatic initiation capability is lost if two Function 3.e channels are inoperable and untripped. In this situation (loss of automatic suction swap), the 24 hour allowance of Required Actions D.2.1 and D.2.2 is not appropriate and the HPCI System must be declared inoperable within 1 hour after discovery of loss of HPCI initiation capability. As noted, Required Action D.1 is only applicable if the HPCI pump suction is not aligned to the suppression pool, since, if aligned, the Function is already performed.

The Completion Time is intended to allow the operator time to evaluate and repair any discovered inoperabilities. This Completion Time also allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." For Required Action D.1, the Completion Time only begins upon discovery that the HPCI System cannot be automatically aligned to the suppression pool due to two inoperable, untripped channels in the same Function. The 1 hour Completion Time from discovery of loss of initiation capability is acceptable because it minimizes risk while allowing time for restoration or tripping of channels.

Because of the diversity of sensors available to provide initiation signals and the redundancy of the ECCS design, an allowable out of service time of 24 hours has been shown to be acceptable (Ref. 5) to permit restoration of any inoperable channel to OPERABLE status. If the inoperable channel cannot be restored to OPERABLE status within the allowable out of service time, the channel must be placed in the tripped condition per Required Action D.2.1 or the suction source must be aligned to the suppression pool per Required Action D.2.2. Placing the inoperable channel in trip performs the intended function of the channel (shifting the suction source to the suppression pool). Performance of either of these two Required Actions will allow operation to continue. If Required Action D.2.1 or D.2.2 is performed, measures should be taken to ensure that the HPCI System piping remains filled with water. Alternately, if it is not

(continued)

ACTIONS

# <u>D.1, D.2.1, and D.2.2</u> (continued)

desired to perform Required Actions D.2.1 and D.2.2 (e.g., as in the case where shifting the suction source could drain down the HPCI suction piping), Condition H must be entered and its Required Action taken.

#### E.1 and E.2

Required Action E.1 is intended to ensure that appropriate actions are taken if multiple, inoperable channels within the Core Spray and Low Pressure Coolant Injection Pump Discharge Flow-Low (Bypass) Functions result in redundant automatic initiation capability being lost for the feature(s). For Required Action E.1, the features would be those that are initiated by Functions 1.d and 2.f (i.e., low pressure ECCS). Redundant automatic initiation capability is lost if (a) two Function 1.d channels are inoperable or (b) two Function 2.f channels are inoperable. Since each inoperable channel would have Required Action E.1 applied separately (refer to ACTIONS Note), each inoperable channel would only require the affected low pressure ECCS pump to be declared inoperable. However, since channels for more than one low pressure ECCS pump are inoperable, and the Completion Times started concurrently for the channels of the low pressure ECCS pumps, this results in the affected low pressure ECCS pumps being concurrently declared inoperable.

In this situation (loss of redundant automatic initiation capability), the 7 day allowance of Required Action E.2 is not appropriate and the subsystem associated with each inoperable channel must be declared inoperable within 1 hour. As noted (Note 1 to Required Action E.1), Required Action E.1 is only applicable in MODES 1, 2, and 3. In MODES 4 and 5, the specific initiation time of the ECCS is not assumed and the probability of a LOCA is lower. Thus, a total loss of initiation capability for 7 days (as allowed by Required Action E.2) is allowed during MODES 4 and 5. A Note is also provided (Note 2 to Required Action E.1) to delineate that Required Action E.1 is only applicable to low pressure ECCS Functions. Required Action E.1 is not applicable to HPCI Function 3.f since the loss of one

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#### ACTIONS E.1 and E.2 (continued)

channel results in a loss of the Function (one-out-of-one logic). This loss was considered during the development of Reference 5 and considered acceptable for the 7 days allowed by Required Action E.2.

The Completion Time is intended to allow the operator time to evaluate and repair any discovered inoperabilities. This Completion Time also allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." For Required Action E.1, the Completion Time only begins upon discovery that a redundant feature in the same system (e.g., both CS subsystems) cannot be automatically initiated due to inoperable channels within the same Function as described in the paragraph above. The 1 hour Completion Time from discovery of loss of initiation capability is acceptable because it minimizes risk while allowing time for restoration of channels.

If the instrumentation that controls the pump minimum flow valve is inoperable, such that the valve will not automatically open, extended pump operation with no injection path available could lead to pump overheating and failure. If there were a failure of the instrumentation, such that the core spray valve would not automatically close, a portion of the pump flow could be diverted from the reactor vessel injection path, causing insufficient core cooling. The low pressure coolant injection minimum flow valve is assumed to remain open during injection. These consequences can be averted by the operator's manual control of the valve, which would be adequate to maintain ECCS pump protection and required flow. Furthermore, other ECCS pumps would be sufficient to complete the assumed safety function if no additional single failure were to occur. The 7 day Completion Time of Required Action E.2 to restore the inoperable channel to OPERABLE status is reasonable based on the remaining capability of the associated ECCS subsystems, the redundancy available in the ECCS design, and the low probability of a DBA occurring during the allowed out of service time. If the inoperable channel cannot be restored to OPERABLE status within the allowable out of service time, Condition H must be entered and its Required Action taken. The Required Actions do not allow placing the channel in trip since this action would not necessarily result in a safe state for the channel in all events.

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F.1 and F.2

Required Action F.1 is intended to ensure that appropriate actions are taken if multiple, inoperable, untripped channels within similar ADS trip system A and B Functions result in redundant automatic initiation capability being lost for the ADS. Redundant automatic initiation capability is lost if either (a) one or more Function 4.a channels and one or more Function 5.a channels are inoperable and untripped or (b) one or more Function 4.b channels and one or more Function 5.b channels are inoperable and untripped.

In this situation (loss of automatic initiation capability), the 96 hour or 8 day allowance, as applicable, of Required Action F.2 is not appropriate and all ADS valves must be declared inoperable within 1 hour after discovery of loss of ADS initiation capability.

The Completion Time is intended to allow the operator time to evaluate and repair any discovered inoperabilities. This Completion Time also allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." For Required Action F.1, the Completion Time only begins upon discovery that the ADS cannot be automatically initiated due to inoperable, untripped channels within similar ADS trip system Functions as described in the paragraph above. The 1 hour Completion Time from discovery of loss of initiation capability is acceptable because it minimizes risk while allowing time for restoration or tripping of channels.

Because of the diversity of sensors available to provide initiation signals and the redundancy of the ECCS design, an allowable out of service time of 8 days has been shown to be acceptable (Ref. 5) to permit restoration of any inoperable channel to OPERABLE status if both HPCI and IC are OPERABLE. If either HPCI or IC is inoperable, the time is shortened to 96 hours. If the status of HPCI or IC changes such that the Completion Time changes from 8 days to 96 hours, the 96 hours begins upon discovery of HPCI or IC inoperability. However, the total time for an inoperable, untripped channel cannot exceed 8 days. If the status of HPCI or IC changes such that the Completion Time changes from 96 hours to 8 days, the "time zero" for beginning the 8 day "clock"

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#### BASES

# ACTIONS <u>F.1 and F.2</u> (continued)

begins upon discovery of the inoperable, untripped channel. If the inoperable channel cannot be restored to OPERABLE status within the allowable out of service time, the channel must be placed in the tripped condition per Required Action F.2. Placing the inoperable channel in trip would conservatively compensate for the inoperability, restore capability to accommodate a single failure, and allow operation to continue. Alternately, if it is not desired to place the channel in trip (e.g., as in the case where placing the inoperable channel in trip would result in an initiation), Condition H must be entered and its Required Action taken.

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

Required Action G.1 is intended to ensure that appropriate actions are taken if multiple, inoperable channels within similar ADS trip system Functions result in automatic initiation capability being lost for the ADS. Automatic initiation capability is lost if either (a) one Function 4.c channel and one Function 5.c channel are inoperable, (b) a combination of Function 4.d, 4.e, 5.d, and 5.e channels are inoperable such that channels associated with five or more low pressure ECCS pumps are inoperable, or (c) one Function 4.f channel and one Function 5.g channel are inoperable.

In this situation (loss of automatic initiation capability), the 96 hour or 8 day allowance, as applicable, of Required Action G.2 is not appropriate, and all ADS valves must be declared inoperable within 1 hour after discovery of loss of ADS initiation capability.

The Completion Time is intended to allow the operator time to evaluate and repair any discovered inoperabilities. This Completion Time also allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." For Required Action G.1, the Completion Time only begins upon discovery that the ADS cannot be automatically initiated due to inoperable channels within similar ADS trip

## ACTIONS <u>G.1 and G.2</u> (continued)

system Functions as described in the paragraph above. The 1 hour Completion Time from discovery of loss of initiation capability is acceptable because it minimizes risk while allowing time for restoration or tripping of channels.

Because of the diversity of sensors available to provide initiation signals and the redundancy of the ECCS design, an allowable out of service time of 8 days has been shown to be acceptable (Ref. 5) to permit restoration of any inoperable channel to OPERABLE status if both HPCI and IC are OPERABLE (Required Action G.2). If either HPCI or IC is inoperable. the time shortens to 96 hours. If the status of HPCI or IC changes such that the Completion Time changes from 8 days to 96 hours, the 96 hours begins upon discovery of HPCI or IC inoperability. However, the total time for an inoperable channel cannot exceed 8 days. If the status of HPCI or IC changes such that the Completion Time changes from 96 hours to 8 days, the "time zero" for beginning the 8 day "clock" begins upon discovery of the inoperable channel. If the inoperable channel cannot be restored to OPERABLE status within the allowable out of service time. Condition H must be entered and its Required Action taken. The Required Actions do not allow placing the channel in trip since this action would not necessarily result in a safe state for the channel in all events.

## <u>H.1</u>

With any Required Action and associated Completion Time not met, the associated feature(s) may be incapable of performing the intended function, and the supported feature(s) associated with inoperable untripped channels must be declared inoperable immediately.

SURVEILLANCE As noted in the beginning of the SRs, the SRs for each ECCS instrumentation Function are found in the SRs column of Table 3.3.5.1–1.

The Surveillances are modified by a Note to indicate that when a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated

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Conditions and Required Actions may be delayed for up to SURVEILLANCE 6 hours as follows: (a) for Functions 3.c, 3.f, and 3.g; REOUTREMENTS and (b) for Functions other than 3.c. 3.f. and 3.g provided (continued) the associated Function or redundant Function maintains ECCS initiation capability. Upon completion of the Surveillance, or expiration of the 6 hour allowance, the channel must be returned to OPERABLE status or the applicable Condition entered and Required Actions taken. This Note is based on the reliability analysis (Ref. 5) assumption of the average time required to perform channel surveillance. That analysis demonstrated that the 6 hour testing allowance does not significantly reduce the probability that the ECCS will initiate when necessary.

## <u>SR 3.3.5.1.1</u>

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

Agreement criteria are determined by the plant 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 instrument has drifted outside its limit.

The Frequency is based upon 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 channels required by the LCO.

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BASES

SURVEILLANCE REQUIREMENTS (continued)

<u>SR 3.3.5.1.2</u>

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the channel will perform the intended function. A successful test of the required contact(s) of a channel relay may be performed by the verification of the change of state of a single contact of the relay. This clarifies what is an acceptable CHANNEL FUNCTIONAL TEST of a relay. This is acceptable because all of the other required contacts of the relay are verified by other Technical Specifications and non-Technical Specifications tests at least once per refueling interval with applicable extensions. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology.

The Frequency of 92 days is based on the reliability analyses of Reference 5.

## <u>SR 3.3.5.1.3</u>

Calibration of trip units provides a check of the actual trip setpoints. The channel must be declared inoperable if the trip setting is discovered to be less conservative than the Allowable Value specified in Table 3.3.5.1-1. If the trip setting is discovered to be less conservative than accounted for in the appropriate setpoint methodology, but is not beyond the Allowable Value, the channel performance is still within the requirements of the plant safety analyses. Under these conditions, the setpoint must be readjusted to be equal to or more conservative than the setting accounted for in the appropriate setpoint methodology.

The Frequency of 92 days is based on the reliability analysis of Reference 5.

## SR 3.3.5.1.4 and SR 3.3.5.1.5

A CHANNEL CALIBRATION is a complete check of the instrument loop and the sensor. This test verifies the channel responds to the measured parameter within the necessary range and accuracy. CHANNEL CALIBRATION leaves the channel

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SURVEILLANCE REQUIREMENTS	<u>SR 3.3.5.1.4 and SR 3.3.5.1.5</u> (continued)			
	adjusted to account for instrument drifts between successive calibrations consistent with the plant specific setpoint methodology. The Frequency of SR 3.3.5.1.4 is based upon the assumption of a 92 day calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis. The Frequency of SR 3.3.5.1.5 is based upon the assumption of a 24 month calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis.			
	The 24 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown that these components usually pass the Surveillance when performed at the 24 month Frequency.			
REFERENCES	1. UFSAR, Section 5.2.			
	2. UFSAR, Section 6.3.			
	3. UFSAR, Chapter 15.			
	<ol> <li>EMF-97-025(P), Revision 1, "LOCA Break Spectrum Analysis for Dresden Units 2 and 3," May 30, 1997.</li> </ol>			
	5. NEDC-30936–P-A, "BWR Owners' Group Technical Specification Improvement Analyses for ECCS Actuation Instrumentation, Part 1 and Part 2," December 1988.			

## B 3.3 INSTRUMENTATION

B 3.3.5.2 Isolation Condenser (IC) System Instrumentation

# BASES

BACKGROUND	The purpose of the IC System instrumentation is to initiate actions to ensure adequate core cooling when the reactor vessel is isolated from its primary heat sink (the main condenser). A more complete discussion of IC System operation is provided in the Bases of LCO 3.5.3, "IC System."		
	The IC System may be initiated by either automatic or manual means. Automatic initiation occurs for sustained (about 17 seconds) conditions of reactor vessel pressure high. The variable is monitored by four pressure switches that are connected to four time delay relays. The outputs of the time delay relays are connected in a one-out-of-two logic to a trip relay. The output of the trip relays are connected in a two-out-of-two logic arrangement. Once initiated, the IC logic can be overridden by the operator.		
APPLICABLE SAFETY ANALYSES	The function of the IC System to provide core cooling to the reactor is used to respond to a main steam line isolation event. Although the IC System is an Engineered Safety Feature System, no credit is taken in the accident analyses for IC System operation. Based on its contribution to the reduction of overall plant risk, however, the IC System, and therefore its instrumentation, satisfies Criterion 4 of 10 CFR 50.36(c)(2)(ii).		
LCO	The OPERABILITY of the IC System instrumentation is dependent upon the OPERABILITY of the four channels of the Reactor Vessel Pressure-High Function. Each channel must have its setpoint within the Allowable Value specified in SR 3.3.5.2.2. The actual setpoint is calibrated consistent with applicable setpoint methodology assumptions.		
	The Allowable Value for the IC System instrumentation Function is specified in the SR. Nominal trip setpoints are specified in the setpoint calculations. The nominal setpoints are selected to ensure that the setpoints do not exceed the Allowable Value between CHANNEL CALIBRATIONS. Operation with a trip setpoint less conservative than the		

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BASES

nominal trip setpoint, but within its Allowable Value, is 1 C O acceptable. A channel is inoperable if its actual trip (continued) setpoint is not within its required Allowable Value. Trip setpoints are those predetermined values of output at which an action should take place. The setpoints are compared to the actual process parameter (e.g., reactor vessel pressure), and when the measured output value of the process parameter exceeds the setpoint, the associated device (e.g., relay) changes state. The analytic limits (or design limits) are derived from the limiting values of the process parameters obtained from the safety analysis. The trip setpoints are determined from the analytic limits, corrected for defined process, calibration, and instrument errors. The Allowable Values are then determined, based on the trip setpoint values, by accounting for the calibration based errors. These calibration based errors are limited to reference accuracy, instrument drift, errors associated with measurement and test equipment, and calibration tolerance of loop components. The trip setpoints and Allowable Values determined in this manner provide adequate protection because instrument uncertainties, process effects, calibration tolerances, instrument drift, and severe environment errors (for channels that must function in harsh environments as defined by 10 CFR 50.49) are accounted for and appropriately applied for the instrumentation. The Reactor Vessel Pressure-High Allowable Value is set high enough to ensure that a potential event is in process. The time delay is determined by engineering judgement to avoid spurious unnecessary activations of the IC by allowing time for the pressure spike, caused by a main steam isolation valve or stop valve closure, to decay. Four channels of Reactor Vessel Pressure-High Function are available and are required to be OPERABLE when IC is required to be OPERABLE to ensure that no single instrument failure can preclude IC initiation. The Function is required to be OPERABLE in MODE 1, and in APPLICABILITY MODES 2 and 3 with reactor steam dome pressure > 150 psig since this is when IC is required to be OPERABLE. (Refer to

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LCO 3.5.3 for Applicability Bases for the IC System.)

#### BASES (continued)

A Note has been provided to modify the ACTIONS related to ACTIONS IC System instrumentation channels. Section 1.3, Completion Times, specifies that once a Condition has been entered, subsequent divisions. subsystems, components, or variables expressed in the Condition discovered to be inoperable or not within limits will not result in separate entry into the Condition. Section 1.3 also specifies that Required Actions of the Condition continue to apply for each additional failure, with Completion Times based on initial entry into the Condition. However, the Required Actions for inoperable IC System instrumentation channels provide appropriate compensatory measures for separate inoperable channels. As such, a Note has been provided that allows separate Condition entry for each inoperable IC System instrumentation channel.

## A.1 and A.2

Required Action A.1 is intended to ensure that appropriate actions are taken if multiple, inoperable, untripped channels result in a complete loss of automatic initiation capability for the IC System. In this case, automatic initiation capability is lost if two channels associated with the same trip relay are inoperable and untripped. In this situation (loss of automatic initiation capability), the 24 hour allowance of required Action A.2 is not appropriate, and the IC System must be declared inoperable within 1 hour after discovery of loss of IC initiation capability.

The Completion Time is intended to allow the operator time to evaluate and repair any discovered inoperabilities. This Completion Time also allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." For Required Action A.1, the Completion Time only begins upon discovery that the IC System cannot be automatically initiated due to two or more inoperable, untripped Reactor Vessel Pressure-High channels. The 1 hour Completion Time for discovery of loss of initiation capability is acceptable because it minimizes risk while allowing time for restoration or tripping of channels.

### ACTIONS <u>A.1 and A.2</u> (continued)

Because of the redundancy of sensors available to provide initiation signals and the fact that the IC System is not assumed in any accident or transient analysis, an allowable out of service time of 24 hours has been shown to be acceptable (Ref. 1) to permit restoration of any inoperable channel to OPERABLE status. If the inoperable channel cannot be restored to OPERABLE status within the allowable out of service time, the channel must be placed in the tripped condition per Required Action A.2. Placing the inoperable channel in trip would conservatively compensate for the inoperability, restore capability to accommodate a single failure, and allow operation to continue. Alternately, if it is not desired to place the channel in trip (e.g., as in the case where placing the inoperable channel in trip would result in an initiation), Condition B must be entered and its Required Action taken.

## <u>B.1</u>

With any Required Action and associated Completion Time of Condition A not met, the IC System may be incapable of performing the intended function, and the IC System must be declared inoperable immediately.

SURVEILLANCE REQUIREMENTS The Surveillances are modified by a Note to indicate that when a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours provided the Reactor Vessel Pressure – High Function maintains initiation capability. Upon completion of the Surveillance, or expiration of the 6 hour allowance, the channel must be returned to OPERABLE status or the applicable Condition entered and Required Actions taken.

## <u>SR 3.3.5.2.1</u>

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the channel will perform the intended function. A successful test of the required contact(s) of a channel relay may be performed by the verification of the

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SR 3.3.5.2.1 (continued) SURVEILLANCE REQUIREMENTS change of state of a single contact of the relay. This clarifies what is an acceptable CHANNEL FUNCTIONAL TEST of a relay. This is acceptable because all of the other required contacts of the relay are verified by other Technical Specifications and non-Technical Specifications tests at least once per refueling interval with applicable extensions. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology. The Frequency of 31 days is based on plant operating experience with regard to channel OPERABILITY and drift that demonstrates that failure of more than one channel in any 31 day interval is rare. SR 3.3.5.2.2 and SR 3.3.5.2.3 A CHANNEL CALIBRATION is a complete check of the instrument loop and the sensor. This test verifies the channel responds to the measured parameter within the necessary range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations consistent with the plant specific setpoint methodology. A Note to SR 3.3.5.2.2 states that this SR is not required for the time delay portion of these channels. This allowance is consistent with the plant specific setpoint methodology. This portion of the channels must be calibrated in accordance with SR 3.3.5.2.3. The Frequency of SR 3.3.5.2.2 is based upon the assumption of a 92 day calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis. The Frequency of SR 3.3.5.2.3 is based upon the assumption of a 24 month calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis. (continued)

BASES	
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SURVEILLANCE REQUIREMENTS (continued)	<u>SR 3.3.5.2.4</u>			
	The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required initiation logic for a specific channel. The system functional testing performed in LCO 3.5.3 overlaps this Surveillance to provide complete testing of the safety function.			
	Surve outage Surve Operat	A month Frequency is based on the need to perform this illance under the conditions that apply during a plant e and the potential for an unplanned transient if the illance were performed with the reactor at power. ting experience has shown that these components usually the Surveillance when performed at the 24 month ency.		
REFERENCES		GENE-770-06-2-A, "Addendum to Bases for Changes to Surveillance Test Intervals and Allowed Out-of-Service Times for Selected Instrumentation Technical Specifications," December 1992.		