PECO
ENERGY

Peach Bottom Atomic Power Station

IMPROVED TECHNICAL SPECIFICATIONS (UNIT #3 BASES)

ITS

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B 2.0 SAFETY LIMITS (SLs)

B 2.1.1 Reactor Core SLs

BASES

BACKGROUND

SLs ensure that specified acceptable fuel design limits are not exceeded during steady state operation, normal operational transients, and abnormal operational transients.

The fuel cladding integrity SL is set such that no 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 for General Electric (GE) Company and Siemens Power Corporation (SPC) fuel. 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 abnormal operational transients, at least 99.9% of the fuel rods in the core do not experience transition boiling.

(continued)

BASES

BACKGROUND (continued)

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 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 safety limit provides margin such that the safety limit will not be reached or exceeded.

APPLICABLE SAFETY ANALYSES

The fuel cladding must not sustain damage as a result of normal operation and abnormal operational transients. 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.

The Reactor Protection System setpoints (LCO 3.3.1.1, "Reactor Protection System (RPS) Instrumentation"), in combination with 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 limit.

2.1.1.1 Fuel Cladding Integrity

GE critical power correlations are applicable for all critical power calculations at pressures ≥ 785 psig and core flows ≥ 10% of rated flow. For operation at low pressures or low flows, another basis is used, as follows:

The pressure drop in the bypass region is essentially all elevation head with a value > 4.5 psi; therefore, the core pressure drop at low power and flows will always be > 4.5 psi. At power, the static head inside

(continued)

BASES

APPLICABLE SAFETY ANALYSES

2.1.1.1 Fuel Cladding Integrity (continued)

the bundle is less than the static head in the bypass region because the addition of heat reduces the density of the water. At the same time, dynamic head loss in the bundle will be greater than in the bypass region because of two phase flow effects. Analyses show that this combination of effects causes bundle pressure drop to be nearly independent of bundle power when bundle flow is 28 X 10^3 lb/hr and bundle pressure drop is 3.5 psi. Because core pressure drop at low power and flows will always be > 4.5 psi, the bundle flow will be > 28 X 10^3 lb/hr.

Full scale ATLAS test data taken at pressures from 14.7 psia (0 psig) to 800 psia (785 psig) indicate that the fuel assembly critical power with bundle flow at 28 X 10^3 lb/hr is approximately 3.35 MWt. This is equivalent to a THERMAL POWER > 50% RTP even when design peaking factors are considered. Therefore, a THERMAL POWER limit of 25% RTP prevents any bundle from exceeding critical power and is a conservative limit when reactor pressure < 785 psig.

In addition to being applicable to GE fuel, the Fuel Cladding Integrity Safety Limit is also applicable to the Lead Fuel Assemblies (LFAs) manufactured by SPC as justified in Reference 1.

2.1.1.2 MCPR

The fuel cladding integrity SL is set such that no fuel damage is calculated to occur if the limit is not violated. Since the parameters that result in fuel damage are not directly observable during reactor operation, the thermal and hydraulic conditions that result in the onset of transition boiling have been used to mark the beginning of the region in which fuel damage could occur. Although it is recognized that the onset of transition boiling would not result in damage to BWR fuel rods, the critical power at which boiling transition is calculated to occur has been adopted as a convenient limit. However, the uncertainties in monitoring the core operating state and in the procedures used to calculate the critical power result in an uncertainty in the value of the critical power. Therefore,

(continued)

BASES

APPLICABLE SAFETY ANALYSES

2.1.1.2 MCPR (continued)

the fuel cladding integrity SL is defined as the critical power ratio in the limiting fuel assembly for which more than 99.9% of the fuel rods in the core are expected to avoid boiling transition, considering the power distribution within the core and all uncertainties.

The MCPR SL is determined using a statistical model that combines all the uncertainties in operating parameters and the procedures used to calculate critical power. The probability of the occurrence of boiling transition is determined using the approved General Electric Critical Power correlations. Details of the fuel cladding integrity SL calculation are given in Reference 2. Reference 2 also includes a tabulation of the uncertainties used in the determination of the MCPR SL and of the nominal values of the parameters used in the MCPR SL statistical analysis. In addition to being applicable to GE fuel, the MCPR Safety Limit is also applicable to the LFAs manufactured by SPC as justified in Reference 1.

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 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 reduction in cooling capability could lead to elevated cladding temperatures and clad perforation. The core can be adequately cooled as long as water level is above ⅔ 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.

(continued)

BASES (continued)

SAFETY LIMITS

The reactor core SLs are established to protect the integrity of the fuel clad barrier to 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 VIOLATIONS

2.2.1

If any SL is violated, the NRC Operations Center must be notified within 1 hour, in accordance with 10 CFR 50.72 (Ref. 3).

2.2.2

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. 4). 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.

2.2.3

If any SL is violated, the senior management of the nuclear plant and the utility shall be notified within 24 hours. The 24 hour period provides time for plant operators and staff to take the appropriate immediate action and assess the condition of the unit before reporting to the senior management.

(continued)

BASES

SAFETY LIMIT VIOLATIONS (continued)

2.2.4

If any SL is violated, a Licensee Event Report shall be prepared and submitted within 30 days to the NRC in accordance with 10 CFR 50.73 (Ref. 5). A copy of the report shall also be provided to the senior management of the nuclear plant and the utility.

2.2.5

If any SL is violated, restart of the unit shall not commence until authorized by the NRC. This requirement ensures the NRC that all necessary reviews, analyses, and actions are completed before the unit begins its restart to normal operation.

REFERENCES

1. EMF-93-115 (P), July 1993.
2. NEDE-24011-P-A-10, February 1991.
3. 10 CFR 50.72.
4. 10 CFR 100.
5. 10 CFR 50.73.

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 with regard to pressure excursions. Per the UFSAR (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 abnormal operational transients.

During normal operation and abnormal operational transients, 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. Any further hydrostatic testing with fuel in the core may be done under LCO 3.10.1, "Inservice Leak and Hydrostatic Testing Operation." 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.

APPLICABLE SAFETY ANALYSES

The RCS safety/relief valves and the Reactor Protection System Reactor Pressure—High Function have settings established to ensure that the RCS pressure SL will not be exceeded.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

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 designated to Section III, 1965 Edition of the ASME, Boiler and Pressure Vessel Code, including Addenda through the summer of 1966 (Ref. 5), which permits a maximum pressure transient of 110%, 1375 psig, of design pressure 1250 psig. The SL of 1325 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 ASME Section III, including Addenda through the winter of 1981 (Ref. 6), for the reactor recirculation piping, which permits a maximum pressure transient of 110% of design pressures of 1250 psig for suction piping and 1500 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 110% of design pressures of 1250 psig for suction piping and 1500 psig for discharge piping. The most limiting of these allowances is the 110% of design pressures of 1250 psig; therefore, the SL on maximum allowable RCS pressure is established at 1325 psig as measured at the reactor steam dome.

APPLICABILITY

SL 2.1.2 applies in all MODES.

SAFETY LIMIT VIOLATIONS

2.2.1

If any SL is violated, the NRC Operations Center must be notified within 1 hour, in accordance with 10 CFR 50.72 (Ref. 7).

(continued)

BASES

SAFETY LIMIT VIOLATIONS (continued)

2.2.2

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

2.2.3

If any SL is violated, the senior management of the nuclear plant and the utility shall be notified within 24 hours. The 24 hour period provides time for plant operators and staff to take the appropriate immediate action and assess the condition of the unit before reporting to the senior management.

2.2.4

If any SL is violated, a Licensee Event Report shall be prepared and submitted within 30 days to the NRC in accordance with 10 CFR 50.73 (Ref. 8). A copy of the report shall also be provided to the senior management of the nuclear plant and the utility.

2.2.5

If any SL is violated, restart of the unit shall not commence until authorized by the NRC. This requirement ensures the NRC that all necessary reviews, analyses, and actions are completed before the unit begins its restart to normal operation.

REFERENCES

1. UFSAR, Section 1.5.2.2.

2. ASME, Boiler and Pressure Vessel Code, Section III, Article NB-7000.

(continued)

BASES

REFERENCES (continued)

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

4. 10 CFR 100.

5. ASME, Boiler and Pressure Vessel Code, Section III, 1965 Edition, including Addenda to summer of 1966.

6. ASME, Boiler and Pressure Vessel Code, Section III, 1980 Edition, Addenda to winter of 1981.

7. 10 CFR 50.72.

8. 10 CFR 50.73.

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

(continued)

BASES

LCO 3.0.2 (continued)

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

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

The nature of some Required Actions of some Conditions necessitates that, once the Condition is entered, the Required Actions must be completed even though the associated 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 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. Alternatives that would not result in redundant equipment being inoperable should be used instead. Doing so limits the time both subsystems/divisions of a safety function are inoperable and limits the time other conditions exist which 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.

(continued)

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.

(continued)

BASES

LCO 3.0.3 (continued)

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

a. The LCO is now met.

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

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

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

In MODES 1, 2, 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 3.7.7, "Spent Fuel Storage Pool Water Level." LCO 3.7.7 has an Applicability of "During movement of fuel assemblies

(continued)

BASES

LCO 3.0.3 (continued)

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 3.7.7 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 3.7.7 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

(continued)

BASES

LCO 3.0.4 (continued)

provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown.

Exceptions to LCO 3.0.4 are stated in the individual Specifications. 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 SRs to demonstrate:

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

b. The OPERABILITY of other equipment.

(continued)

BASES

LCO 3.0.5 (continued)

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 allowed SRs. This Specification does not provide time to perform any other preventive or corrective maintenance.

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

An example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of an SR 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 an SR on another channel in the same trip system.

LCO 3.0.6

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

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

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BASES

LCO 3.0.6 (continued)

systems' LCOs' 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 3.0.7

There are certain special tests and operations required to be performed at various times over the life of the unit. These special tests and operations are necessary to demonstrate select unit performance characteristics, to perform special maintenance activities, and to perform

(continued)

BASES

LCO 3.0.7 (continued)

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.

The Applicability of a Special Operations LCO represents a condition not necessarily in compliance with the normal 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 LCO's 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.

B 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

BASES

SRs	SR 3.0.1 through SR 3.0.4 establish the general requirements applicable to all Specifications 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. Surveillances, including Surveillances invoked by Required Actions, do not have to be performed on inoperable equipment because the ACTIONS define the remedial measures that apply. Surveillances have to be met and performed in accordance with SR 3.0.2, prior to returning equipment to OPERABLE status.

(continued)

BASES

SR 3.0.1 (continued)

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 psi. 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 psi 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 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).

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BASES

SR 3.0.2 (continued)

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 include a Note in the Frequency stating, "SR 3.0.2 is not applicable." An example of an exception when the test interval is not specified in the regulations is the Note in the Primary Containment Leakage Rate Testing Program, "SR 3.0.2 is not applicable." This exception is provided because the program already includes extension of test intervals.

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

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

SR 3.0.3

SR 3.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified

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BASES

SR 3.0.3 (continued)

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

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

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

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

(continued)

BASES

SR 3.0.3 (continued)

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.

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

The provisions of 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 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

(continued)

BASES

SR 3.0.4 (continued)

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.

B 3.1 REACTIVITY CONTROL SYSTEMS

B 3.1.1 SHUTDOWN MARGIN (SDM)

BASES

BACKGROUND

SDM requirements are specified to ensure:

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

b. The reactivity transients associated with postulated accident conditions are controllable within acceptable limits; and

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

These requirements are satisfied by the control rods, as described in the UFSAR Section 1.5 (Ref. 1), which can compensate for the reactivity effects of the fuel and water temperature changes experienced during all operating conditions.

APPLICABLE SAFETY ANALYSES

The control rod drop accident (CRDA) analysis (Refs. 2 and 3) assumes the core is subcritical with the highest worth control rod withdrawn. Typically, the first control rod withdrawn has a very high reactivity worth and, should the core be critical during the withdrawal of the first control rod, the consequences of a CRDA could exceed the fuel damage limits for a CRDA (see Bases for LCO 3.1.6, "Rod Pattern Control"). Also, SDM is assumed as an initial condition for the control rod removal error during refueling (Ref. 4) and fuel assembly insertion error during refueling (Ref. 5) accidents. The analysis of these reactivity insertion events 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 3.10.6, "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

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BASES

APPLICABLE SAFETY ANALYSES (continued)

SDM has been demonstrated. Prevention or mitigation of reactivity insertion events is necessary to limit energy deposition in the fuel to prevent significant fuel damage, which could result in undue release of radioactivity. Adequate SDM ensures inadvertent criticalities and potential CRDAs involving high worth control rods (namely the first control rod withdrawn) will not cause significant fuel damage.

SDM satisfies Criterion 2 of the NRC Policy Statement.

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 during the design process, a design margin is included to account for uncertainties in the design calculations (Ref. 6).

APPLICABILITY

In MODES 1 and 2, SDM must be provided because subcriticality with the highest worth control rod withdrawn is assumed in the CRDA analysis (Ref. 2). 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. 4) or a fuel assembly insertion error (Ref. 5).

ACTIONS

A.1

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

(continued)

BASES

ACTIONS

A.1 (continued)

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.

B.1

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.

C.1

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 for Unit 3 is OPERABLE; and secondary containment isolation capability (i.e., at least one secondary containment isolation valve and associated instrumentation are OPERABLE, or other acceptable administrative controls to assure isolation capability), in each associated secondary containment penetration flow path not isolated that is assumed to be isolated to mitigate radioactivity releases. This may be performed as

(continued)

BASES

ACTIONS

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

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 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 for Unit 3 is OPERABLE; and secondary containment isolation capability (i.e., at least one secondary containment isolation valve and associated instrumentation are OPERABLE, or other acceptable administrative controls to assure isolation capability), in each associated secondary containment penetration flow path not isolated that is assumed to be isolated to mitigate radioactive releases. This may be performed as an administrative check, by examining logs or other

(continued)

BASES

ACTIONS

E.1, E.2, E.3, E.4, and E.5 (continued)

information, to determine if the components are out of service for maintenance or other reasons. It is not necessary to perform the SRs 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

SR 3.1.1.1

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 before or during the first startup after fuel movement or 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. 7). For the SDM 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

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.1.1.1 (continued)

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 3.10.7, "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 3.1.1.1 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, including modified quadrant 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.

REFERENCES

1. UFSAR, Sections 1.5.1.8 and 1.5.2.2.7.

2. UFSAR, Section 14.6.2.

3. NEDE-24011-P-A-10-US, "General Electric Standard Application for Reactor Fuel," Supplement for United States, Section S.2.2.3.1, February 1991.

4. UFSAR, Section 14.5.3.3.

5. UFSAR, Section 14.5.3.4.

(continued)

BASES

REFERENCES (continued)

6. UFSAR, Section 3.6.5.4.

7. NEDE-24011-P-A-10, "General Electric Standard Application for Reactor Fuel," Section 3.2.4.1, February 1991.

B 3.1 REACTIVITY CONTROL SYSTEMS

B 3.1.2 Reactivity Anomalies

BASES

BACKGROUND

In accordance with the UFSAR (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 abnormal operational transients. Therefore, reactivity anomaly 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 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

(continued)

BASES

BACKGROUND (continued)

control rod density, 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 control rod densities for actual plant conditions and is then compared to the predicted value for the cycle exposure.

APPLICABLE SAFETY ANALYSES

Accurate prediction of core reactivity is either an explicit 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 rod density 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 rod density 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 rod density from the predicted rod density 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 satisfy Criterion 2 of the NRC Policy Statement.

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

(continued)

BASES

LCO (continued)

uncertainties in the "Nuclear Design Methodology" are larger than expected. A limit on the difference between the monitored and the predicted rod density of ± 1% $\Delta k/k$ has been established based on engineering judgment. A > 1% deviation in reactivity from that predicted is larger than expected for normal operation and should therefore be evaluated. A deviation as large as 1% would not exceed the design conditions of the reactor and is on the safe side of the postulated transients.

APPLICABILITY

In MODE 1, most of the control rods are withdrawn and steady 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 anomaly is not required during these conditions.

ACTIONS

A.1

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 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.

(continued)

BASES

ACTIONS

A.1 (continued)

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.

B.1

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 REQUIREMENTS

SR 3.1.2.1

Verifying the reactivity difference between the monitored and predicted rod density 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 rod density for the reactor conditions obtained from plant instrumentation. A comparison of the monitored rod density to the predicted rod density 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 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 rod density 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

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.1.2.1 (continued)

flow changes) at ≥ 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. The 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.

REFERENCES

1. UFSAR, Section 1.5.

2. UFSAR, Chapter 14.

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 abnormal operational transients, 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 specified in Reference 1.

The CRD System consists of 185 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," and LCO 3.1.5, "Control Rod Scram Accumulators," 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 SAFETY ANALYSES

The analytical methods and assumptions used in the evaluations involving control rods are presented in References 2, 3, and 4. The control rods provide the primary means for rapid reactivity control (reactor scram), for maintaining the reactor subcritical and for limiting the potential effects of reactivity insertion events caused by malfunctions in the CRD System.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

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 3.2.1, "AVERAGE PLANAR LINEAR HEAT GENERATION RATE (APLHGR)," and LCO 3.2.3, "LINEAR HEAT GENERATION RATE (LHGR)"), and the fuel damage 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 damage 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 the NRC Policy Statement.

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 to determine the control rod position. Accumulator 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

(continued)

BASES

LCO (continued)

control over the number and distribution of inoperable control rods is required to satisfy the assumptions of the DBA and transient analyses.

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 (i.e., the control rod cannot be inserted by CRD drive water and cannot be inserted by scram pressure.) With a fully inserted control rod stuck, only those actions specified in Condition C 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 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 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

(continued)

BASES

ACTIONS

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

location adjacent to one "slow" control rod when there is another pair of "slow" control rods 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. The control rod should be isolated from scram and normal insert and withdraw pressure, while maintaining cooling water to the CRD.

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 the RWM (LCO 3.3.2.1). The allowed Completion Time of 24 hours from discovery of Condition A concurrent with THERMAL POWER greater than the LPSP of the RWM 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

(continued)

BASES

ACTIONS

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

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 and maintain MODE 3 conditions (Ref. 5).

B.1

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.

C.1 and C.2

With one or more control rods inoperable for reasons other than being stuck in the withdrawn position (including a control rod which is stuck in the fully inserted 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

(continued)

BASES

ACTIONS

C.1 and C.2 (continued)

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 generic banked position withdrawal sequence (BPWS) analysis (Ref. 5) requires inserted control rods not in compliance with BPWS to be separated by at least two OPERABLE control rods in all directions, including the diagonal. Therefore, if two or more inoperable control rods are not in compliance with BPWS and not separated by at least two OPERABLE control rods, action must be taken to restore compliance with BPWS 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 BPWS is not required to be 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.

E.1

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

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BASES

ACTIONS

E.1 (continued)

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 REQUIREMENTS

SR 3.1.3.1

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, 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.

SR 3.1.3.2 and SR 3.1.3.3

Control rod insertion capability is demonstrated by 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 Banked Position Withdrawal Sequence (BPWS) (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 rods. Partially withdrawn control rods are tested at a 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

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BASES

SURVEILLANCE REQUIREMENTS

SR 3.1.3.2 and SR 3.1.3.3 (continued)

determination of that control rod's trippability (OPERABILITY) must be made and appropriate action taken. For example, the unavailability of the Reactor Manual Control System does not affect the OPERABILITY of the control rods, provided SR 3.1.3.2 and SR 3.1.3.3 are current in accordance with SR 3.0.2.

SR 3.1.3.4

Verifying that the scram time for each control rod to notch position 06 is ≤ 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 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 a control rod does not go to the withdrawn overtravel position. 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 (CRD changeout and blade replacement or complete cell disassembly, i.e., guide tube removal). This includes control rods inserted one notch and then returned

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BASES

SURVEILLANCE REQUIREMENTS

SR 3.1.3.5 (continued)

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 1.5.1.1 and 1.5.2.2.

2. UFSAR, Section 14.6.2.

3. UFSAR, Appendix K, Section VI.

4. UFSAR, Chapter 14.

5. NEDO-21231, "Banked Position Withdrawal Sequence," Section 7.2, January 1977.

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 abnormal operational transients 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 References 2, 3, and 4. 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.

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BASES

APPLICABLE SAFETY ANALYSES (continued)

The scram function of the CRD System protects 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)") and the 1% cladding plastic strain fuel design limit (see Bases for LCO 3.2.1, "AVERAGE PLANAR LINEAR HEAT GENERATION RATE (APLHGR)"), which ensure that no fuel damage will occur if these limits are not exceeded. Above 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. 5) and, therefore, also provides protection against violating fuel damage 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 the NRC Policy Statement.

LCO

The scram times specified in Table 3.1.4-1 (in the accompanying LCO) are required to ensure that the scram reactivity assumed in the DBA and transient analysis is met (Ref. 6).

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., 185 x 7% ≈ 13) 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

(continued)

BASES

LCO (continued)

index tube passes a specific location and then opens ("dropout") as the index tube travels upward. Verification of the specified scram times in Table 3.1.4-1 is accomplished through measurement of the "dropout" times.

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.

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

A.1

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 experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging plant systems.

(continued)

BASES (continued)

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.

SR 3.1.4.1

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 ≥ 800 psig demonstrates acceptable scram times for the transients analyzed in References 3 and 4.

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 after fuel movement within the reactor pressure vessel or after a shutdown ≥ 120 days or longer, all control rods are required to be tested before exceeding 40% RTP. 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 work on control rods or the CRD System.

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

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.1.4.2 (continued)

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 active 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."

SR 3.1.4.3

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. This surveillance can be met by performance of either scram time testing or Diaphragm Alternative Response Time (DART) testing, when it is concluded that DART testing monitors the performance of all affected components. The testing must be performed once before declaring the control rod OPERABLE. The required testing must demonstrate the affected control rod is still within acceptable limits. The limits for reactor pressures < 800 psig are established based on a high probability of meeting the acceptance criteria at reactor pressures ≥ 800 psig. Limits for ≥ 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)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.1.4.3 (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.

SR 3.1.4.4

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 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 ≥ 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 only fuel movement occurs, then only those control rods associated with the core cells affected by the fuel movement are required to be scram time tested.

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.

REFERENCES

1. UFSAR, Sections 1.5.1.3 and 1.5.2.2.

2. UFSAR, Section 14.6.2.

(continued)

BASES

REFERENCES

3. UFSAR, Appendix K, Section VI.

4. UFSAR, Chapter 14.

5. NEDE-24011-P-A-10, "General Electric Standard Application for Reactor Fuel," Section 3.2.4.1, February 1991.

6. Letter from R. E. Janecek (BWROG) to R. W. Starostecki (NRC), "BWR Owners Group Revised Reactivity Control System Technical Specifications," BWROG-8754, September 17, 1987.

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 References 1, 2, and 3. 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 3.2.1, "AVERAGE PLANAR LINEAR HEAT GENERATION RATE (APLHGR)," and LCO 3.2.3, "LINEAR HEAT GENERATION RATE (LHGR)"), 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"). Control rod scram accumulators satisfy Criterion 3 of the NRC Policy Statement.

(continued)

BASES (continued)

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 ≥ 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 scram time was within the limits of Table 3.1.4-1 during the last scram time test. Otherwise, the control rod would 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

(continued)

BASES

ACTIONS

A.1 and A.2 (continued)

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 ≥ 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 water 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 scram time is within the limits of Table 3.1.4-1 during the last scram time test. Otherwise, the control rod would 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 B.2.2) and LCO 3.1.3 entered. This would

(continued)

BASES

ACTIONS

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

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.

C.1 and C.2

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.

D.1

The reactor mode switch must be immediately placed in the shutdown position if either Required Action and associated Completion Time associated with the loss of the CRD charging pump (Required Actions B.1 and C.1) cannot be met. This ensures that all insertable control rods are inserted and that the reactor is in a condition that does not require the

(continued)

BASES

ACTIONS

D.1 (continued)

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 REQUIREMENTS

SR 3.1.5.1

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 approximately 1450 psig (Ref. 1). 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 3.4.5.3 and Figure 3.4.10.

2. UFSAR, Appendix K, Section VI.

3. UFSAR, Chapter 14.

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 and 2.

APPLICABLE SAFETY ANALYSES

The analytical methods and assumptions used in evaluating the CRDA are summarized in References 1 and 2. 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_2 have been shown to be insignificant below fuel energy depositions of 300 cal/gm (Ref. 3), the fuel damage limit of 280 cal/gm provides a margin of safety from significant core damage which would result in release of radioactivity (Refs. 4 and 5). Generic evaluations (Refs. 1 and 6) 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. 7) and the calculated offsite doses will be well within the required limits (Ref. 5).

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

Control rod patterns analyzed in Reference 1 follow the banked position withdrawal sequence (BPWS). The BPWS is applicable from the condition of all control rods fully inserted to 10% RTP (Ref. 2). For the BPWS, 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. Generic analysis of the BPWS (Ref. 1) has demonstrated that the 280 cal/gm fuel damage limit will not be violated during a CRDA while following the BPWS mode of operation. The generic BPWS analysis (Ref. 8) also evaluates 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.

Rod pattern control satisfies Criterion 3 of the NRC Policy Statement.

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 BPWS. 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 BPWS.

APPLICABILITY

In MODES 1 and 2, when THERMAL POWER is ≤ 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 configuration that results in a control rod worth that could exceed the 280 cal/gm fuel damage limit during a CRDA (Ref. 2). In MODES 3, 4, and 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.

(continued)

BASES (continued)

ACTIONS

A.1 and A.2

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 ≤ 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. When the control rod pattern is not in compliance with the prescribed sequence, all control rod movement must be stopped except for moves needed to correct the rod pattern, or scram if warranted.

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 or a qualified member of the technical staff (i.e., personnel trained in accordance with an approved training program). This ensures 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.

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

(continued)

BASES

ACTIONS

B.1 and B.2 (continued)

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 or a qualified member of the technical staff.

When nine or more OPERABLE control rods are not in compliance with BPWS, 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 REQUIREMENTS

SR 3.1.6.1

The control rod pattern is verified to be in compliance with the BPWS 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 BPWS 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 ≤ 10% RTP.

REFERENCES

1. NEDE-24011-P-A-10-US, "General Electric Standard Application for Reactor Fuel, Supplement for United States," Section 2.2.3.1, February 1991.

2. Letter (BWROG-8644) from T. Pickens (BWROG) to G. C. Lainas (NRC), "Amendment 17 to General Electric Licensing Topical Report NEDE-24011-P-A."

3. UFSAR, Section 14.6.2.3.

4. NUREG-0800, Section 15.4.9, Revision 2, July 1981.

5. 10 CFR 100.11.

(continued)

BASES

REFERENCES (continued)

6. NEDO-21778-A, "Transient Pressure Rises Affected Fracture Toughness Requirements for Boiling Water Reactors," December 1978.

7. ASME, Boiler and Pressure Vessel Code.

8. 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 using enriched boron.

Reference 1 requires a SLC System with a minimum flow capacity and boron content equivalent in control capacity to 86 gpm of 13 weight percent sodium pentaborate solution. Natural sodium pentaborate solution is 19.8% atom Boron-10. Therefore, the system parameters of concern, boron concentration (C), SLC pump flow rate (Q), and Boron-10 enrichment (E), may be expressed as a multiple of ratios. The expression is as follows:

$$\frac{C}{13\%\ \text{weight}} \times \frac{Q}{86\ \text{gpm}} \times \frac{E}{19.8\%\ \text{atom}}$$

If the product of this expression is ≥ 1, then the SLC System satisfies the criteria of Reference 1. As such, the equation forms the basis for acceptance criteria for the surveillances of concentration, flow rate, and boron enrichment and is presented in Table 3.1.7-1.

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.

(continued)

BASES (continued)

APPLICABLE SAFETY ANALYSES

The SLC System is manually initiated from the main control room, as directed by the emergency operating procedures, if the operator believes 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 660 ppm of natural boron, in the reactor coolant at 68°F. To allow for potential leakage and imperfect mixing in the reactor system, an additional amount of boron equal to 25% of the amount cited above is added (Ref. 2). The minimum mass of Boron-10 (162.7 lbm) needed for injection is calculated such that the required quantity is achieved accounting for dilution in the RPV with normal water level and including the water volume in the residual heat removal shutdown cooling piping and in the recirculation loop piping. This quantity of borated solution is the amount that is above the pump suction shutoff level in the boron solution storage tank. No credit is taken for the portion of the tank volume that cannot be injected. The maximum concentration of sodium pentaborate listed in Table 3.1.7-1 has been established to ensure that the solution saturation temperature does not exceed 43°F.

The SLC System satisfies Criterion 4 of the NRC Policy Statement.

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.

(continued)

BASES (continued)

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 and A.2

If the boron solution concentration is > 9.82% weight but the concentration and temperature of boron in solution and pump suction piping temperature are within the limits of Figure 3.1.7-1, operation is permitted for a limited period since the SLC subsystems are capable of performing the intended function. It is not necessary under these conditions to declare both SLC subsystems inoperable since the SLC subsystems are capable of performing their intended function.

The concentration and temperature of boron in solution and pump suction piping temperature must be verified to be within the limits of Figure 3.1.7-1 within 8 hours and once per 12 hours thereafter (Required Action A.1). The temperature versus concentration curve of Figure 3.1.7-1 ensures a 10°F margin will be maintained above the saturation temperature. This verification ensures that boron does not precipitate out of solution in the storage tank or in the pump suction piping due to low boron solution temperature (below the saturation temperature for the given concentration). The Completion Time for performing Required Action A.1 is considered acceptable given the low probability of a Design Basis Accident (DBA) or transient occurring concurrent with the failure of the control rods to shut down the reactor and operating experience which has shown there are relatively slow variations in the measured parameters of concentration and temperature over these time periods.

(continued)

BASES

ACTIONS

A.1 and A.2 (continued)

Continued operation is only permitted for 72 hours before boron solution concentration must be restored to ≤ 9.82% weight. Taking into consideration that the SLC System design capability still exists for vessel injection under these conditions and the low probability of the temperature and concentration limits of Figure 3.1.7-1 not being met, the allowed Completion Time of 72 hours is acceptable and provides adequate time to restore concentration to within limits.

The second Completion Time for Required Action A.1 establishes a limit on the maximum time allowed for any combination of concentration out of limits or inoperable SLC subsystems during any single contiguous occurrence of failing to meet the LCO. If Condition A is entered while, for instance, an SLC subsystem is inoperable and that subsystem is subsequently returned to OPERABLE, the LCO may already have been not met for up to 7 days. This situation could lead to a total duration of 10 days (7 days in Condition B, followed by 3 days in Condition A), since initial failure of the LCO, to restore the SLC System. Then an SLC subsystem could be found inoperable again, and concentration could be restored to within limits. This could continue indefinitely.

This Completion Time allows for an exception to the normal "time zero" for beginning the allowed outage time "clock," resulting in establishing the "time zero" at the time the LCO was initially not met instead of at the time Condition A was entered. The 10 day Completion Time is an acceptable limitation on this potential to fail to meet the LCO indefinitely.

B.1

If one SLC subsystem is inoperable for reasons other than Condition A, the inoperable subsystem must be restored to OPERABLE status within 7 days. In this condition, the remaining OPERABLE subsystem is adequate to perform the shutdown function. However, the overall reliability is reduced because a single failure in the remaining OPERABLE subsystem could result in the loss of SLC System shutdown capability. The 7 day Completion Time is based on the

(continued)

BASES

ACTIONS

B.1 (continued)

availability of an OPERABLE subsystem capable of performing the intended SLC System function and the low probability of a DBA or severe transient occurring concurrent with the failure of the Control Rod Drive (CRD) System to shut down the plant.

The second Completion Time for Required Action B.1 establishes a limit on the maximum time allowed for any combination of concentration out of limits or inoperable SLC subsystem during any single contiguous occurrence of failing to meet the LCO. If Condition B is entered while, for instance, concentration is out of limits, and is subsequently returned to within limits, the LCO may already have been not met for up to 3 days. This situation could lead to a total duration of 10 days (3 days in Condition A, followed by 7 days in Condition B), since initial failure of the LCO, to restore the SLC System. Then concentration could be found out of limits again, and the SLC subsystem could be restored to OPERABLE. This could continue indefinitely.

This Completion Time allows for an exception to the normal "time zero" for beginning the allowed outage time "clock," resulting in establishing the "time zero" at the time the LCO was initially not met instead of at the time Condition B was entered. The 10 day Completion Time is an acceptable limitation on this potential to fail to meet the LCO indefinitely.

C.1

If both SLC subsystems are inoperable for reasons other than Condition A, 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.

D.1

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

(continued)

BASES

ACTIONS

D.1 (continued)

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 REQUIREMENTS

SR 3.1.7.1, SR 3.1.7.2, and SR 3.1.7.3

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 level 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 level 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 precipitate out in the storage tank or in the pump suction piping. The temperature limit specified in SR 3.1.7.2 and SR 3.1.7.3 and the maximum sodium pentaborate concentration specified in Table 3.1.7-1 ensures that a 10°F margin will be maintained above the saturation temperature. Control room alarms for low SLC storage tank temperature and low SLC System piping temperature are available and are set at 55°F. As such, SR 3.1.7.2 and SR 3.1.7.3 may be satisfied by verifying the absence of low temperature alarms for the SLC storage tank and SLC System piping. The 24 hour Frequency is based on operating experience and has shown there are relatively slow variations in the measured parameters of level 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.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.1.7.4 and SR 3.1.7.6 (continued)

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 and power operated 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.

SR 3.1.7.5

This Surveillance requires an examination of the sodium pentaborate solution by using chemical analysis to ensure that the proper concentration of boron 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 boron solution concentration is $\leq$ 9.82% weight and within the limits of Table 3.1.7-1. SR 3.1.7.5 must also be performed anytime the temperature is restored to within limits to ensure that no significant boron precipitation occurred. The 31 day Frequency of this Surveillance is appropriate because of the relatively slow variation of boron concentration between surveillances.

SR 3.1.7.7

Verifying the quantity of Boron-10 (B-10) in the SLC tank ensures the reactor can be shutdown in the event that enough control rods cannot be inserted to accomplish shutdown and

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.1.7.7 (continued)

cooldown in the normal manner. The required quantity contains an additional amount of B-10 equal to 25% of the minimum required amount of B-10 necessary to shutdown the reactor, to account for potential leakage and imperfect mixing. The 31 day frequency is based on operating experience and is appropriate because of the relatively slow variations in the quantity of B-10 between surveillances.

SR 3.1.7.8

Demonstrating that each SLC System pump develops a flow rate ≥ 43.0 gpm at a discharge pressure ≥ 1255 psig ensures that pump performance has not degraded below design values during the fuel cycle. This test is indicative of overall performance. Such inservice inspections confirm component OPERABILITY, trend performance, and detect incipient failures by indicating abnormal performance. In addition, the test results for each pump are used to determine that the limits of Table 3.1.7-1 are satisfied for each SLC subsystem. The Frequency of this Surveillance is in accordance with the Inservice Testing Program.

SR 3.1.7.9

This Surveillance ensures 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 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 will pass the

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.1.7.9 (continued)

Surveillance when performed at the 24 month Frequency; therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

SR 3.1.7.10

Enriched sodium pentaborate solution is made by mixing granular, enriched sodium pentaborate with water. In order to ensure the proper B-10 atom percentage (in accordance with Table 3.1.7-1) is being used, calculations must be performed to verify the actual B-10 enrichment within 8 hours after addition of the solution to the SLC tank. The calculations may be performed using the results of isotopic tests on the granular sodium pentaborate or vendor certification documents. The Frequency is acceptable considering that boron enrichment is verified during the procurement process and any time boron is added to the SLC tank.

REFERENCES

1. 10 CFR 50.62.

2. UFSAR, Section 3.8.4.

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. As discussed in Reference 1, the SDV vent and drain valves need not be considered primary containment isolation valves (PCIVs) for the Scram Discharge System. (However, at PBAPS, these valves are considered PCIVs.) 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 a common instrument volume that receives all of the control rod drive (CRD) discharges. The instrument volume is connected to a common drain line with two valves in series. Each header is connected to a common vent line with two valves in series for a total of four vent valves. 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 2.

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 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. 3).

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. 3), and adequate core cooling is maintained (Ref. 1). The SDV vent and drain valves allow continuous drainage of the SDV during normal plant operation 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

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)	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 the NRC Policy Statement.
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 be opened following 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, 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. This provides adequate controls to ensure that only a single control rod can be withdrawn. 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.

(continued)

BASES

ACTIONS (continued)

A.1

When one SDV vent or drain valve is inoperable in one or more lines, the valve must be restored to OPERABLE status within 7 days. The Completion Time is reasonable, given the level of redundancy in the lines and the low probability of a scram occurring during the time the valves are inoperable. 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.

B.1

If both valves in a line are inoperable, the line must be isolated to contain the reactor coolant during a scram. When a line is isolated, the potential for an inadvertent scram due to high SDV level is increased. Required Action B.1 is modified by a Note that allows periodic draining and venting of the SDV when a line is isolated. 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, if a scram occurs with the valve open.

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.

C.1

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 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.

(continued)

BASES (continued)

SURVEILLANCE REQUIREMENTS

SR 3.1.8.1

During normal operation, the SDV vent and drain valves should be in the open position (except when performing SR 3.1.8.2 or SR 3.3.1.1.9 for Function 13, Manual Scram, of Table 3.3.1.1-1) 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.

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 15 seconds after receipt of a scram signal is based on the bounding leakage case evaluated in the accident analysis (Ref. 2). The LOGIC SYSTEM FUNCTIONAL TEST in LCO 3.3.1.1 and the scram time testing of control rods in LCO 3.1.3 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

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.1.8.3 (continued)

unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown these components will pass the Surveillance when performed at the 24 month Frequency; therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

REFERENCES

1. NUREG-0803, "Generic Safety Evaluation Report Regarding Integrity of BWR Scram System Piping," August 1981.

2. UFSAR, Sections 3.4.5.3.1 and 7.2.3.6.

3. 10 CFR 100.

B 3.2 POWER DISTRIBUTION LIMITS

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 fuel design limits identified in Reference 1 are not exceeded during abnormal operational transients and that the peak cladding temperature (PCT) during the postulated design basis loss of coolant accident (LOCA) does not exceed the limits specified in 10 CFR 50.46.

APPLICABLE SAFETY ANALYSES

The analytical methods and assumptions used in evaluating the fuel design limits are presented in References 1 and 2. The analytical methods and assumptions used in evaluating Design Basis Accidents (DBAs), abnormal operational transients, and normal operation that determine the APLHGR limits are presented in References 1, 2, 3, 4, 5, 6, 7, and 8.

Fuel design evaluations are performed to demonstrate that the 1% limit on the fuel cladding plastic strain and other fuel design limits described in Reference 1 are not exceeded during abnormal operational transients for operation with LHGRs up to the operating limit LHGR. APLHGR limits are equivalent to the LHGR limit for each fuel rod divided by the local peaking factor of the fuel assembly. APLHGR limits are developed as a function of exposure and the various operating core flow and power states to ensure adherence to fuel design limits during the limiting abnormal operational transients (Refs. 5, 6, 7, and 8). Flow dependent APLHGR limits are determined using the three dimensional BWR simulator code (Ref. 9) to analyze slow flow runout transients. The flow dependent multiplier, $MAPFAC_f$, is dependent on the maximum core flow runout capability. The maximum runout flow is dependent on the existing setting of the core flow limiter in the Recirculation Flow Control System.

Based on analyses of limiting plant transients (other than core flow increases) over a range of power and flow conditions, power dependent multipliers, $MAPFAC_p$, are also generated. Due to the sensitivity of the transient response to initial core flow levels at power levels below those at

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BASES

APPLICABLE SAFETY ANALYSES (continued)

which turbine stop valve closure and turbine control valve fast closure scram trips are bypassed, both high and low core flow $MAPFAC_p$ limits are provided for operation at power levels between 25% RTP and the previously mentioned bypass power level. The exposure dependent APLHGR limits are reduced by $MAPFAC_p$ and $MAPFAC_f$ at various operating conditions to ensure that all fuel design criteria are met for normal operation and abnormal operational transients. A complete discussion of the analysis code is provided in Reference 10.

LOCA analyses are then performed to ensure that the above determined APLHGR limits are adequate to meet the 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 11. 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. The APLHGR limits specified are equivalent to the LHGR of the highest powered fuel rod assumed in the LOCA analysis divided by its local peaking factor. A conservative multiplier is applied to the LHGR assumed in the LOCA analysis to account for the uncertainty associated with the measurement of the APLHGR.

For single recirculation loop operation, the MAPFAC multiplier is limited to a maximum of 0.90 (Ref. 11). This maximum limit 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.

In addition to being applicable to the General Electric (GE) fuel, the APLHGR limits are also applicable to the Lead Fuel Assemblies (LFAs) manufactured by Siemens Power Corporation (SPC) as justified in Reference 12.

The APLHGR satisfies Criterion 2 of the NRC Policy Statement.

LCO

The APLHGR limits specified in the COLR are the result of the fuel design, DBA, and transient analyses. For two

(continued)

BASES

LCO (continued)

recirculation loops operating, the limit is determined by multiplying the smaller of the $MAPFAC_p$ and $MAPFAC_f$ factors times 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 smaller of either the single loop operation $MAPFAC_p$ or $MAPFAC_f$.

APPLICABILITY

The APLHGR limits are primarily derived from fuel design evaluations and LOCA and transient analyses that are assumed to occur at high power levels. Design calculations (Ref. 6) 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 wide range neutron monitor period-short 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

A.1

If any APLHGR exceeds the required limits, an assumption regarding an initial condition of the DBA and transient analyses 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 transient or DBA occurring simultaneously with the APLHGR out of specification.

B.1

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 POWER must be reduced to < 25% RTP within 4 hours. The

(continued)

BASES

ACTIONS

B.1 (continued)

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

SR 3.2.1.1

APLHGRs are required to be initially calculated within 12 hours after THERMAL POWER is ≥ 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 ≥ 25% RTP is achieved is acceptable given the large inherent margin to operating limits at low power levels.

REFERENCES

1. NEDO-24011-P-A-10, "General Electric Standard Application for Reactor Fuel," February 1991.

2. UFSAR, Chapter 3.

3. UFSAR, Chapter 6.

4. UFSAR, Chapter 14.

5. NEDO-24229-1, "Peach Bottom Atomic Power Station Units 2 and 3, Single Loop Operation," May 1980.

6. NEDC-32162P, "Maximum Extended Load Line Limit and ARTS Improvement Program Analyses for Peach Bottom Atomic Power Station Units 2 and 3," Revision 1, February 1993.

7. NEDC-32183P, "Power Rerate Safety Analysis Report for Peach Bottom 2 & 3," May 1993.

8. NEDC-32427P, "Peach Bottom Atomic Power Station Unit 3 Cycle 10 ARTS Thermal Limits Analyses," December 1994.

9. NEDO-30130-A, "Steady State Nuclear Methods," May 1985.

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BASES

REFERENCES (continued)

10. NEDO-24154, "Qualification of the One-Dimensional Core Transient Model for Boiling Water Reactors," October 1978.

11. NEDC-32163P, "Peach Bottom Atomic Power Station Units 2 and 3 SAFER/GESTR-LOCA Loss-of-Coolant Accident Analysis," January 1993.

12. EMF-93-115 (P), July 1993.

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 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 abnormal operational transients. 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 abnormal operational transients 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 (ΔCPR). When the largest ΔCPR (corrected for analytical uncertainties) is added to the MCPR SL, the required operating limit MCPR is obtained.

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BASES

APPLICABLE SAFETY ANALYSES (continued)

The MCPR operating limits derived from the transient analysis are dependent on the operating core flow and power state ($MCPR_f$ and $MCPR_p$, respectively) to ensure adherence to fuel design limits during the worst transient that occurs with moderate frequency (Refs. 6, 7, 8, and 9). 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. 10) to analyze slow flow runout transients. The operating limit is dependent on the maximum core flow limiter setting in the Recirculation Flow Control System.

Power dependent MCPR limits ($MCPR_p$) are determined mainly by the one dimensional transient code (Ref. 11). Due to the sensitivity of the transient response to initial core flow levels at power levels below those at which the turbine stop valve closure and turbine control valve fast closure scrams are bypassed, high and low flow $MCPR_p$ operating limits are provided for operating between 25% RTP and the previously mentioned bypass power level.

In addition, unique MCPR limits have been established for the Lead Fuel Assemblies (LFAs) manufactured by Siemens Power Corporation (SPC) as discussed in Reference 12.

The MCPR satisfies Criterion 2 of the NRC Policy Statement.

LCO

The MCPR operating limits specified in the COLR are the result of the Design Basis Accident (DBA) and transient analysis. The operating limit MCPR is determined by the larger of the $MCPR_f$ and $MCPR_p$ limits.

APPLICABILITY

The MCPR operating limits are primarily derived from transient analyses that are assumed to occur at high power levels. Below 25% RTP, the reactor is operating at a minimum 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 nominal value of the initial MCPR expected at 25% RTP is > 3.5. Studies of the variation of limiting transient behavior have been performed over the range of power and

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BASES

APPLICABILITY (continued)

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 wide range neutron monitor period-short function 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

A.1

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.

B.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.

SURVEILLANCE REQUIREMENTS

SR 3.2.2.1

The MCPR is required to be initially calculated within 12 hours after THERMAL POWER is ≥ 25% RTP and then every 24 hours thereafter. It is compared to the specified limits

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.2.2.1 (continued)

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 ≥ 25% RTP is achieved is acceptable given the large inherent margin to operating limits at low power levels.

SR 3.2.2.2

Because the transient analysis takes 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 analysis. SR 3.2.2.2 determines the value of τ, which is a measure of the actual scram speed distribution compared with the assumed distribution. The MCPR operating limit is then determined based on an interpolation between the applicable limits for Option A (scram times of LCO 3.1.4,"Control Rod Scram Times") and Option B (realistic scram times) analyses. The parameter τ must be determined once within 72 hours after each set of scram time tests required by SR 3.1.4.1 and SR 3.1.4.2 because the effective scram speed distribution may change during the cycle. The 72 hour Completion Time is acceptable due to the relatively minor changes in τ expected during the fuel cycle.

REFERENCES

1. NUREG-0562, June 1979.

2. NEDO-24011-P-A-10, "General Electric Standard Application for Reactor Fuel," February 1991.

3. UFSAR, Chapter 3.

4. UFSAR, Chapter 6.

5. UFSAR, Chapter 14.

6. NEDO-24229-1, "Peach Bottom Atomic Power Station Units 2 and 3, Single Loop Operation," May 1980.

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BASES

REFERENCES (continued)

7. NEDC-32162P, "Maximum Extended Load Line Limit and ARTS Improvement Program Analyses for Peach Bottom Atomic Power Station Units 2 and 3," Revision 1, February 1993.

8. NEDC-32183P, "Power Rerate Safety Analysis Report for Peach Bottom 2 & 3," May 1993.

9. NEDC-32427P, "Peach Bottom Atomic Power Station Unit 3 Cycle 10 ARTS Thermal Limits Analyses," December 1994.

10. NEDO-30130-A, "Steady State Nuclear Methods," May 1985.

11. NEDO-24154, "Qualification of the One-Dimensional Core Transient Model for Boiling Water Reactors," October 1978.

12. EMF-93-115 (P), July 1993.

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, including abnormal operational transients. 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 anticipated operating conditions identified in Reference 1.

APPLICABLE SAFETY ANALYSES

The analytical methods and assumptions used in evaluating the fuel system design are presented in References 1, 2, 3, 4, 5, 6, 7, 8, and 9. 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. The mechanisms that could cause fuel damage during operational transients and that are considered in fuel evaluations are:

a. Rupture of the fuel rod cladding caused by strain from the relative expansion of the UO_2 pellet; and

b. Severe overheating of the fuel rod cladding caused by inadequate cooling.

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. 10).

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

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)	includes allowances for short term transient operation above the operating limit to account for abnormal operational transients, plus an allowance for densification power spiking. The LHGR satisfies Criterion 2 of the NRC Policy Statement.
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 operating 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 ≥ 25% RTP.
ACTIONS	A.1 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. B.1 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.

(continued)

BASES (continued)

SURVEILLANCE REQUIREMENTS

SR 3.2.3.1

The LHGR is required to be initially calculated within 12 hours after THERMAL POWER is ≥ 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 slow changes in power distribution during normal operation. The 12 hour allowance after THERMAL POWER ≥ 25% RTP is achieved is acceptable given the large inherent margin to operating limits at lower power levels.

REFERENCES

1. NEDO-24011-P-A-10, "General Electric Standard Application for Reactor Fuel," February 1991.

2. UFSAR, Chapter 3.

3. UFSAR, Chapter 6.

4. UFSAR, Chapter 14.

5. NEDO-24229-1, "Peach Bottom Atomic Power Station Units 2 and 3, Single-Loop Operation," May 1980.

6. NEDC-32162P, "Maximum Extended Load Line Limit and ARTS Improvements Program Analyses for Peach Bottom Atomic Power Station Units 2 and 3," Revision 1, February 1993.

7. NEDC-32183P, "Power Rerate Safety Analysis Report for Peach Bottom 2 & 3," May 1993.

8. NEDC-32163P, "Peach Bottom Atomic Power Station Units 2 and 3 SAFER/GESTR-LOCA Loss-of-Coolant Accident Analysis," January 1993.

9. EMF-93-115 (P), July 1993.

10. NUREG-0800, Section 4.2, Subsection II.A.2(g), Revision 2, July 1981.

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 System (RCS) 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 shown 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 trip oil pressure, turbine stop valve (TSV) position, drywell pressure, scram discharge volume (SDV) water level, condenser vacuum, main steam line radiation, as well as reactor mode switch in shutdown position, manual scram signals, and RPS test switches. There are at least four redundant sensor input signals from each of these parameters (with the exception of the manual scram signal and the reactor mode switch in shutdown scram signal). 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.

(continued)

BASES

BACKGROUND (continued)

The RPS is comprised of two independent trip systems (A and B) with three logic channels in each trip system (logic channels A1, A2, and A3; B1, B2, and B3) as shown in the Reference 1 figures. Logic channels A1, A2, B1, and B2 contain automatic logic for which the above monitored parameters each have at least one input to each of these logic channels. The outputs of the 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. In addition to the automatic logic channels, logic channels A3 and B3 (one logic channel per trip system) are manual scram channels. Both must be depressed in order to 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), a relay prevents reset of the trip systems for 10 seconds after the full scram signal is received. 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.

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 controls the SDV vent and drain valves such that when logic channels A1 and B1 are deenergized or when logic channel A3 is deenergized the

(continued)

BASES

BACKGROUND (continued)

inboard SDV vent and drain valves close to isolate the SDV, and when logic channels A2 and B2 are deenergized or when logic channel B3 is deenergized the outboard 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 and 3. The RPS is required to initiate 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 maintain OPERABILITY and to preserve the integrity of the fuel cladding, the reactor coolant pressure boundary (RCPB), and the containment, by minimizing the energy that must be absorbed following a LOCA.

RPS instrumentation satisfies Criterion 3 of the NRC Policy Statement. 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.

Allowable Values, where applicable, are specified for each RPS Function specified in the Table. Trip setpoints are specified in the setpoint calculations. The trip setpoints are selected to ensure that the actual setpoints do not exceed the Allowable Value between successive CHANNEL CALIBRATIONS. Operation with a trip setting less conservative than the trip setpoint, but within its Allowable Value, is acceptable. A channel is inoperable if its actual trip setting 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

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

the process parameter exceeds the setpoint, the associated device (e.g., trip unit) changes state. The analytic or design limits are derived from the limiting values of the process parameters obtained from the safety analysis or other appropriate documents. The Allowable Values are derived from the analytic or design limits, corrected for calibration, process, and instrument errors. The trip setpoints are determined from analytical or design limits, corrected for calibration, process, and instrument errors, as well as instrument drift. In selected cases, the Allowable Values and trip setpoints are determined by engineering judgement or historically accepted practice relative to the intended function of the trip channel. The trip setpoints determined in this manner provide adequate protection by assuring instrument and process uncertainties expected for the environments during the operating time of the associated trip channels are accounted for.

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.

The individual Functions are required to be OPERABLE in the MODES or other specified 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.

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BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

The specific Applicable Safety Analyses, LCO, and Applicability discussions are listed below on a Function by Function basis.

Wide Range Neutron Monitor (WRNM)

1.a. Wide Range Neutron Monitor Period-Short

The WRNMs provide signals to facilitate reactor scram in the event that core reactivity increase (shortening period) exceeds a predetermined reference rate. To determine the reactor period, the neutron flux signal is filtered. The period of this filtered neutron flux signal is used to generate trip signals when the respective trip setpoints are exceeded. The time to trip for a particular reactor period is dependent on the filter time constant, actual period of the signal and the trip setpoints. This period based signal is available over the entire operating range from initial control rod withdrawal to full power operation. In the startup range, the most significant source of reactivity change is due to control rod withdrawal. The WRNM provides diverse protection from the rod worth minimizer (RWM), which monitors and controls the movement of control rods at low power. The RWM prevents the withdrawal of an out of sequence control rod during startup that could result in an unacceptable neutron flux excursion (Ref. 2). The WRNM provides mitigation of the neutron flux excursion. To demonstrate the capability of the WRNM System to mitigate control rod withdrawal events, an analysis has been performed (Ref. 3) to evaluate the consequences of control rod withdrawal events during startup that are mitigated only by the WRNM period-short function. The withdrawal of a control rod out of sequence, during startup, analysis (Ref. 3) assumes that one WRNM channel in each trip system is bypassed, demonstrates that the WRNMs provide protection against local control rod withdrawal errors and results in peak fuel enthalpy below the 170 cal/gm fuel failure threshold criterion.

The WRNMs are also capable of limiting other reactivity excursions during startup, such as cold water injection events, although no credit is specifically assumed.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

1.a. Wide Range Neutron Monitor Period-Short (continued)

The WRNM System is divided into two groups of WRNM channels, with four channels inputting to each trip system. The analysis of Reference 3 assumes that one channel in each trip system is bypassed. Therefore, six channels with three channels in each trip system are required for WRNM OPERABILITY to ensure that no single instrument failure will preclude a scram from this Function on a valid signal.

The analysis of Reference 3 has adequate conservatism to permit an Allowable Value of 13 seconds.

The WRNM Period-Short 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 WRNMs provide monitoring for and protection against unexpected reactivity excursions. In MODE 1, the APRM System and the RWM provide protection against control rod withdrawal error events and the WRNMs are not required. The WRNMs are automatically bypassed when the mode switch is in the Run position.

1.b. Wide Range Neutron Monitor - Inop

This trip signal provides assurance that a minimum number of WRNMs are OPERABLE. Anytime a WRNM mode switch is moved to any position other than "Operate," a loss of power occurs, or the self-test system detects a failure which would result in the loss of a safety-related function, an inoperative trip signal will be received by the RPS unless the WRNM is bypassed. Since only one WRNM in each trip system may be bypassed, only one WRNM 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.

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BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

1.b. Wide Range Neutron Monitor – Inop (continued)

Six channels of the Wide Range Neutron Monitor – Inop Function, 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. Since this Function is not assumed in the safety analysis, there is no Allowable Value for this Function.

This Function is required to be OPERABLE when the Wide Range Neutron Monitor Period-Short Function is required.

Average Power Range Monitor (APRM)

The APRM channels provide the primary indication of neutron flux within the core and respond almost instantaneously to neutron flux increases. The APRM channels receive input signals from the local power range monitors (LPRMs) within the reactor core to 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.

The APRM System is divided into four APRM channels and four 2-out-of-4 voter channels. Each APRM channel provides inputs to each of the four voter channels. The four voter channels are divided into two groups of two each, with each group of two providing inputs to one RPS trip system. The system is designed to allow one APRM channel, but no voter channels, to be bypassed. A trip from any one unbypassed APRM will result in a "half-trip" in all four of the voter channels, but no trip inputs to either RPS trip system. A trip from any two unbypassed APRM channels will result in a full trip in each of the four voter channels, which in turn results in two trip inputs into each RPS trip system, thus resulting in a full scram signal. Three of the four APRM channels and all four of the voter channels are required to be OPERABLE to ensure that no single failure will preclude a scram on a valid signal. In addition, to provide adequate coverage of the entire core, consistent with the design bases for the APRM functions, at least 20 LPRM inputs, with at least three LPRM inputs from each of the four axial levels at which the LPRMs are located, must be operable for each APRM channel, and the number of LPRM inputs that have become inoperable (and bypassed) since the last APRM calibration (SR 3.3.1.1.2) must be less than ten for each APRM channel.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

2.a. Average Power Range Monitor Neutron Flux-High (Setdown) (continued)

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 Monitor Neutron Flux-High (Setdown) Function will provide a secondary scram to the Wide Range Neutron Monitor Period-Short Function because of the relative setpoints. At higher power levels, it is possible that the Average Power Range Monitor Neutron Flux-High (Setdown) Function will provide the primary trip signal for a corewide 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 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 since the potential for criticality exists. In MODE 1, the 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.

2.b. Average Power Range Monitor Simulated Thermal Power-High

The Average Power Range Monitor Simulated Thermal Power-High Function monitors average neutron flux to approximate the THERMAL POWER being transferred to the reactor coolant. The APRM neutron flux is electronically filtered with a time constant representative of the fuel heat transfer dynamics to generate a signal proportional to the THERMAL POWER in the reactor. The 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 with a fixed control rod pattern) but is clamped at an upper limit that is always lower than the Average Power Range Monitor Neutron Flux-High Function Allowable Value.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

2.b. Average Power Range Monitor Simulated Thermal Power-High (continued)

The Average Power Range Monitor Simulated Thermal Power-High Function is not specifically credited in the safety analysis but is intended to provide an additional margin of protection from transient induced fuel damage during operation where recirculation flow is reduced to below the minimum required for rated power operation. The Average Power Range Monitor Simulated Thermal Power-High Function provides protection against transients where THERMAL POWER increases slowly (such as the loss of feedwater heating event) and protects the fuel cladding integrity by ensuring that the MCPR SL is not exceeded. During these events, the THERMAL POWER increase does not significantly lag the neutron flux scram. For rapid neutron flux increase events, the THERMAL POWER lags the neutron flux and the Average Power Range Monitor Neutron Flux-High Function will provide a scram signal before the Average Power Range Monitor Simulated Thermal Power-High Function setpoint is exceeded.

Each APRM channel uses one total drive flow signal representative of total core flow. The total drive flow signal is generated by the flow processing logic, part of the APRM channel, by summing up the flow calculated from two flow transmitter signal inputs, one from each of the two recirculation loop flows. The flow processing logic OPERABILITY is part of the APRM channel OPERABILITY requirements for this Function. The APRM flow processing logic 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 or Downscale flow 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 Simulated Thermal Power-High function, thus maintaining that function operable.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

2.b. Average Power Range Monitor Simulated Thermal Power-High (continued)

The Allowable Value is based on analyses that take credit for the Average Power Range Monitor Simulated Thermal Power-High Function for the mitigation of non-limiting events. The THERMAL POWER time constant of < 7 seconds is based on the fuel heat transfer dynamics and provides a signal proportional to the THERMAL POWER.

The Average Power Range Monitor Simulated Thermal Power-High Function is required to be OPERABLE in MODE 1 when there is the possibility of generating excessive THERMAL POWER and potentially exceeding the SL applicable to high pressure and core flow conditions (MCPR SL). During MODES 2 and 5, other WRNM and APRM Functions provide protection for fuel cladding integrity.

2.c. Average Power Range Monitor Neutron Flux-High

The Average Power Range Monitor Neutron Flux-High Function is capable of generating a trip signal to prevent fuel damage or excessive RCS pressure. For the overpressurization protection analysis of Reference 4, the Average Power Range Monitor Neutron Flux-High Function is assumed to terminate the main steam isolation valve (MSIV) closure event and, along with the safety/relief valves (S/RVs), limit the peak reactor pressure vessel (RPV) pressure to less than the ASME Code limits. The control rod drop accident (CRDA) analysis (Ref. 5) takes credit for the Average Power Range Monitor Neutron Flux-High Function to terminate the CRDA.

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BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

2.c. Average Power Range Monitor Neutron Flux-High (continued)

The Allowable Value is based on the Analytical Limit assumed in the CRDA analysis.

The Average Power Range Monitor Neutron Flux-High 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 Neutron Flux-High Function is assumed in the CRDA analysis, 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 WRNM trips, provides adequate protection. Therefore, the Average Power Range Monitor Neutron Flux-High Function is not required in MODE 2.

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BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

2.d. Average Power Range Monitor – Inop

Three of the four APRM channels are required to be OPERABLE for each of the APRM Functions. This Function (Inop) provides assurance that the minimum number of APRM channels are OPERABLE.

For any APRM channel, any time its mode switch is not in the "Operate" position, an APRM module required to issue a trip is unplugged, or the automatic self-test system detects a critical fault with the APRM channel, an Inop trip is sent to all four voter channels. Inop trips from two or more non-bypassed APRM channels result in a trip output from each of the four voter channels to it's associated trip system. 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.

There is no Allowable Value for this Function.

This Function is required to be OPERABLE in the MODES where the APRM Functions are required.

2.e. 2-Out-Of-4 Voter

The 2-Out-Of-4 Voter Function provides the interface between the APRM Functions and the final RPS trip system logic. As such, it is required to be OPERABLE in the MODES where the APRM Functions are required and is necessary to support the safety analysis applicable to each of those Functions. Therefore, the 2-Out-Of-4 Voter Function needs to be OPERABLE in MODES 1 and 2.

All four voter channels are required to be OPERABLE. Each voter channel includes self-diagnostic functions. If any voter channel detects a critical fault in its own processing, a trip is issued from that voter channel to the associated trip system.

There is no Allowable Value for this Function.

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BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

3. Reactor Pressure—High

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 Pressure—High Function initiates a scram for transients that result in a pressure increase, counteracting the pressure increase by rapidly reducing core power. For the overpressurization protection analysis of Reference 4, the Reactor Pressure—High Function is credited as a backup Scram Function only. The analyses conservatively assume the scram occurs on the Average Power Range Monitor Scram Clamp signal, not the Reactor Pressure—High signal. The reactor scram, along with the S/RVs, limits the peak RPV pressure to less than the ASME Section III Code limits.

High reactor pressure signals are initiated from four pressure transmitters that sense reactor pressure. The Reactor 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 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 (Level 3)

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 Level 3 to substantially reduce the heat generated in the fuel from fission. The Reactor Vessel Water Level—Low (Level 3) Function is assumed in the analysis of events resulting in the decrease of reactor coolant inventory (Ref. 6). This is credited as a backup scram function for large and intermediate break LOCAs inside

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

4. Reactor Vessel Water Level—Low (Level 3) (continued)

primary containment. 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 (Level 3) signals are initiated from four 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 (variable leg) in the vessel.

Four channels of Reactor Vessel Water Level—Low (Level 3) 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 (Level 3) 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 pressure ECCS subsystems at Reactor Vessel Water—Low Low Low (Level 1) will not be required.

The Function is required in MODES 1 and 2 where considerable energy exists in the RCS resulting in the limiting transients and accidents. ECCS initiations at Reactor Vessel Water Level—Low Low (Level 2) and Low Low Low (Level 1) provide sufficient protection for level transients in all other MODES.

5. Main Steam Isolation Valve—Closure

MSIV closure results in loss of the main turbine and the condenser as a heat sink for the nuclear steam supply system and indicates a need to shut down the reactor to reduce heat generation. Therefore, a reactor scram is initiated on a 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

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

5. Main Steam Isolation Valve—Closure (continued)

transient. However, for the overpressurization protection analysis of Reference 4, the Average Power Range Monitor Scram Clamp Function, along with the S/RVs, limits the peak RPV pressure to less than the ASME Section III Code limits. That is, the direct scram on position switches for MSIV closure events is not assumed in the overpressurization analysis. 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.

Eight channels of the Main Steam Isolation Valve—Closure Function, with four 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 valid signal. This Function is only required in MODE 1 since, with the MSIVs open and the heat generation rate high, a pressurization transient can occur if the MSIVs close. In MODE 2, the heat generation rate is low enough so that the other diverse RPS functions provide sufficient protection.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

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 during large and intermediate break LOCAs inside 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 transmitters 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. Scram Discharge Volume Water Level—High

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. No credit is taken for a scram initiated from the Scram Discharge Volume Water Level—High Function for any of the design basis accidents or transients analyzed in the UFSAR. However, this function is retained to ensure the RPS remains OPERABLE.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

7. Scram Discharge Volume Water Level—High (continued)

SDV water level is measured by two diverse methods. The level is measured by two float type level switches and two thermal probes for a total of four level signals. The outputs of these devices are arranged so that one device provides input to one RPS logic channel. The level measurement instrumentation satisfies the recommendations of Reference 8.

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 high water level inputs to the RPS from four devices are required to be OPERABLE, with two devices in each trip system, to ensure that no single instrument failure will preclude a scram from this Function on a valid signal. This Function is 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.

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 7 and the feedwater controller failure event. For these events, 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 four position switches; one located on each of the four TSVs. Each switch provides two input signals; one to RPS trip system A and the other, to RPS trip system B. Thus, each RPS trip system receives an input from four Turbine Stop Valve—Closure channels. The logic for the Turbine Stop

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

8. Turbine Stop Valve—Closure (continued)

Valve—Closure Function is such that three or more TSVs must be closed to produce a scram. In addition, certain combinations of two valves closed will result in a half-scram. This Function must be enabled at THERMAL POWER ≥ 30% RTP as measured at the turbine first stage pressure. This is normally accomplished automatically by pressure switches sensing turbine first stage pressure; therefore, opening of the turbine bypass valves may affect 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 if any three TSVs should close. This Function is required, consistent with analysis assumptions, whenever THERMAL POWER is ≥ 30% RTP. This Function is not required when THERMAL POWER is < 30% RTP since the Reactor Pressure—High and the Average Power Range Monitor Scram Clamp Functions are adequate to maintain the necessary safety margins.

9. Turbine Control Valve Fast Closure, Trip Oil Pressure—Low

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 7 and the generator load rejection with bypass failure event. For these events, the reactor scram reduces the amount of energy required to be absorbed and ensures that the MCPR SL is not exceeded.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

9. Turbine Control Valve Fast Closure, Trip Oil Pressure—Low (continued)

Turbine Control Valve Fast Closure, Trip Oil Pressure—Low signals are initiated by the relayed emergency trip supply oil 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 ≥ 30% RTP. This is normally accomplished automatically by pressure switches sensing turbine first stage pressure; therefore, opening of the turbine bypass valves may affect 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 ≥ 30% RTP. This Function is not required when THERMAL POWER is < 30% RTP, since the Reactor Pressure—High and the Average Power Range Monitor Scram Clamp Functions are adequate to maintain the necessary safety margins.

10. Turbine Condenser—Low Vacuum

The Turbine Condenser—Low Vacuum Function protects the integrity of the main condenser by scramming the reactor and thereby decreasing the severity of the low condenser vacuum transient on the condenser. This function also ensures integrity of the reactor due to loss of its normal heat sink. The reactor scram on a Turbine Condenser—Low Vacuum signal will occur prior to a reactor scram from a Turbine Stop Valve—Closure signal. This function is not specifically credited in any accident analysis but is being retained for the overall redundancy and diversity of the RPS as required by the NRC approved licensing basis.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

10. Turbine Condenser—Low Vacuum (continued)

Turbine Condenser—Low Vacuum signals are initiated from four vacuum pressure transmitters that provide inputs to associated trip systems. There are two trip systems and two channels per trip system. Each trip system is arranged in a one-out-of-two logic and both trip systems must be tripped in order to scram the reactor.

The Turbine Condenser—Low Vacuum Allowable Value is specified to ensure that a scram occurs prior to the integrity of the main condenser being breached, thereby limiting the damage to the normal heat sink of the reactor.

Four channels of the Turbine Condenser—Low Vacuum Function with two 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. This Function is only required in MODE 1 where considerable energy exists which could challenge the integrity of the main condenser if vacuum is low. In MODE 2, the Turbine Condenser—Low Vacuum Function is not required because at low power levels the transients are less severe.

11. Main Steam Line—High Radiation

Main Steam Line—High Radiation Function ensures prompt reactor shutdown upon detection of high radiation in the vicinity of the main steam lines. High radiation in the vicinity of the main steam lines could indicate a gross fuel failure in the core. The scram is initiated to limit the fission product release from the fuel. This Function is not specifically credited in any accident analysis but is being retained for overall redundancy and diversity of the RPS as required by the NRC approved licensing basis.

Main Steam Line—High Radiation signals are initiated from four radiation monitors. Each monitor senses high gamma radiation in the vicinity of the main steam line. The Main Steam Line—High Radiation Allowable Value is selected high enough above background radiation levels to avoid spurious scrams, yet low enough to promptly detect a gross release of fission products from the fuel.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

11. Main Steam Line—High Radiation (continued)

Four channels of Main Steam Line—High Radiation Function with two 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. This Function is required in MODES 1 and 2 where considerable energy exists such that steam is being produced at a rate which could release considerable fission products from the fuel.

12. Reactor Mode Switch—Shutdown Position

The Reactor Mode Switch—Shutdown Position Function provides signals, via the manual scram logic channels, directly to the scram pilot solenoid power circuits. These manual scram logic channels 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 diversity of the RPS as required by the NRC approved licensing basis.

The reactor mode switch is a keylock four-position, four-bank switch. The reactor mode switch is capable of scramming the reactor if the mode switch is placed in the shutdown position. Scram signals from the mode switch are input into each of the two RPS manual scram 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 scram 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.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

13. Manual Scram

The Manual Scram push button channels provide signals, via the manual scram logic channels, directly to the scram pilot solenoid power circuits. These manual scram logic channels 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 diversity of the RPS as required by the NRC approved licensing basis.

There is one Manual Scram push button channel for each of the two RPS manual scram logic channels. In order to cause a scram it is necessary that each channel in both manual scram trip systems 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.

Two channels of Manual Scram with one channel in each manual scram 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.

14. RPS Channel Test Switch

There are four RPS Channel Test Switches, one associated with each of the four automatic scram logic channels (A1, A2, B1, and B2). These keylock switches allow the operator to test the OPERABILITY of each individual logic channel without the necessity of using a scram function trip. This is accomplished by placing the RPS Channel Test Switch in test, which will input a trip signal into the associated RPS logic channel. The RPS Channel Test Switches were not specifically credited in the accident analysis. However, because the Manual Scram Functions at Peach Bottom Atomic Power Station, were not configured the same as the generic model in Reference 9, the RPS Channel Test Switches were included in the analysis in Reference 10. Reference 10 concluded that the Surveillance Frequency extensions from

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

14. RPS Channel Test Switch (continued)

RPS Functions, described in Reference 9, were not affected by the difference in configuration, since each automatic RPS channel has a test switch which is functionally the same as the manual scram switches in the generic model. As such, the RPS Channel Test Switches are retained in the Technical Specifications.

There is no Allowable Value for this Function since the channels are mechanically actuated based solely on the position of the switches.

Four channels of RPS Channel Test Switch with two channels in each trip system arranged in a one-out-of-two logic 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.

ACTIONS

A Note has been provided to modify the ACTIONS related to 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.

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 (Refs. 9, 12 & 13) to permit restoration of any inoperable channel to OPERABLE status. However, this out of service time is only acceptable provided the associated

(continued)

BASES

ACTIONS

A.1 and A.2 (continued)

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 full scram), Condition D must be entered and its Required Action taken.

As noted, Action A.2 is not applicable for APRM Functions 2.a, 2.b, 2.c, and 2.d. Inoperability of one required APRM channel affects both trip systems. For that condition, Required Action A.1 must be satisfied, and is the only action (other than restoring operability) that will restore capability to accommodate a single failure. Inoperability of more than one required APRM channel of the same trip function results in loss of trip capability and entry into Condition C, as well as entery into Condition A for each channel.

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 Function). The reduced reliability of this logic arrangement was not evaluated in References 9, 12 or 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.

(continued)

BASES

ACTIONS

B.1 and B.2 (continued)

Completing one of these Required Actions restores RPS to a reliability level equivalent to that evaluated in References 9, 12 or 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, Condition D must be entered and its Required Action taken.

As noted, Condition B is not applicable for APRM Functions 2.a, 2.b, 2.c, and 2.d. Inoperability of an APRM channel affects both trip systems and is not associated with a specific trip system as are the APRM 2-Out-Of-4 voter and other non-APRM channels for which Condition B applies. For an inoperable APRM channel, Required Action A.1 must be satisfied, and is the only action (other than restoring operability) that will restore capability to accommodate a single failure. Inoperability of more than one required APRM channel results in loss of trip capability and entry into Condition C, as well as entry into Condition A for each channel. Because Condition A and C provide Required Actions that are appropriate for the inoperability of APRM Functions 2.a, 2.b, 2.c, and 2.d, and these functions are not associated with specific trip systems as are the APRM 2-Out-Of-4 voter and other non-APRM channels, Condition B does not apply.

(continued)

BASES

ACTIONS (continued)

C.1

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 an automatic Function, or two or more manual Functions, 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). For Functions 12 (Reactor Mode Switch – Shutdown Position) and 13 (Manual Scram), this would require both trip systems to have one channel, 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.

D.1

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.

(continued)

BASES

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)."

H.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. 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 REQUIREMENTS

As noted at the beginning of the SRs, the SRs for each RPS 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 (Refs. 9, 12 & 13) 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 RPS will trip when necessary.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.1.1.1

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 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.

SR 3.3.1.1.2

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. 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 3.3.1.1.8.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.1.1.2 (continued)

A restriction to satisfying this SR when < 25% RTP is provided that requires the SR to be met only at ≥ 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 and APLHGR). At ≥ 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.

SR 3.3.1.1.3

(Not Used.)

SR 3.3.1.1.4

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. A Frequency of 7 days provides an acceptable level of system average availability over the Frequency and is based on the reliability analysis of References 9 and 10. (The RPS Channel Test Switch Function's CHANNEL FUNCTIONAL TEST Frequency was credited in the analysis to extend many automatic scram Functions' Frequencies.)

SR 3.3.1.1.5 and SR 3.3.1.1.6

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. Any setpoint adjustment shall be made consistent with the assumptions of the current plant specific setpoint methodology.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.1.1.5 and SR 3.3.1.1.6 (continued)

As noted, SR 3.3.1.1.5 is not required to be performed when entering MODE 2 from MODE 1, since testing of the MODE 2 required WRNM Functions cannot be performed in MODE 1 without utilizing jumpers, lifted leads, or movable links. This allows entry into MODE 2 if the 31 day Frequency is not met per SR 3.0.2. In this event, the SR must be performed within 12 hours after entering MODE 2 from MODE 1. Twelve hours is based on operating experience and in consideration of providing a reasonable time in which to complete the SR.

A Frequency of 31 days provides an acceptable level of system average unavailability over the Frequency interval and is based on fixed incore detectors, overall reliability, and self-monitoring features.

SR 3.3.1.1.7

(Not Used.)

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.1.1.8

LPRM gain settings are determined from the local flux profiles measured by the Traversing Incore Probe (TIP) System. This establishes the relative local flux profile for appropriate representative input to the APRM System. The 1000 MWD/T Frequency is based on operating experience with LPRM sensitivity changes.

SR 3.3.1.1.9 and SR 3.3.1.1.14

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology. For Function 5, 7, and 8 channels, verification that the trip settings are less than or equal to the specified Allowable Value during the CHANNEL FUNCTIONAL TEST is not required since the channels consist of mechanical switches and are not subject to drift. An exception to this are two of the Function 7 level switches which are not mechanical. These Scram Discharge Volume (SDV) RPS switches (Fluid Components Inc.) are heat sensitive electronic level detectors which actuate by sensing a difference in temperature. The temperature detectors are permanently affixed within the scram discharge volume piping conservatively below the level (allowable value as measured in gallons) at which an RPS actuation signal will occur. Since there is no drift involved with the physical location of these switches, verifying the trip settings are less than or equal to the specified allowable value during the CHANNEL FUNCTIONAL TEST is not required. Additionally, historical calibration data has indicated that the FCI level switches have not exceeded their Allowable Value when tested.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.1.1.9 and SR 3.3.1.1.14 (continued)

In addition, Function 5 and 7 instruments are not accessible while the unit is operating at power due to high radiation and the installed indication instrumentation does not provide accurate indication of the trip setting. For the Function 9 channels, verification that the trip settings are less than or equal to the specified Allowable Value during the CHANNEL FUNCTIONAL TEST is not required since the instruments are not accessible while the unit is operating at power due to high radiation and the installed indication instrumentation does not provided accurate indication of the trip setting. Waiver of these verifications for the above functions is considered acceptable since the magnitude of drift assumed in the setpoint calculation is based on a 24 month calibration interval. The 92 day Frequency of SR 3.3.1.1.9 is based on the reliability analysis of Reference 9.

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 will pass the Surveillance when performed at the 24 month Frequency.

SR 3.3.1.1.10, SR 3.3.1.1.12, SR 3.3.1.1.15, and SR 3.3.1.1.16

A CHANNEL CALIBRATION is a complete check of the instrument loop and the sensor. This test verifies that 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 current plant specific setpoint methodology. SR 3.3.1.1.16, however, is only a calibration of the radiation detectors using a standard radiation source.

As noted for SR 3.3.1.1.12, neutron detectors are excluded from CHANNEL CALIBRATION because they are passive devices, with minimal drift, and because of the difficulty of simulating a meaningful signal. Changes in

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.1.1.10, SR 3.3.1.1.12, SR 3.3.1.1.15, and SR 3.3.1.1.16 (continued)

neutron detector sensitivity are compensated for by performing the 7 day calorimetric calibration (SR 3.3.1.1.2) and the 1000 MWD/T LPRM calibration against the TIPs (SR 3.3.1.1.8). A second note is provided for SR 3.3.1.1.12 that allows the WRNM SR to be performed within 12 hours of entering MODE 2 from MODE 1. Testing of the MODE 2 WRNM 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 24 month Frequency is not met per SR 3.0.2. Twelve hours is based on operating experience and in consideration of providing a reasonable time in which to complete the SR. For the APRM Simulated Thermal Power-High Function, SR 3.3.1.1.12 also includes calibrating the associated recirculation loop flow channel. A third note is provided for SR 3.3.1.1.12 to include the recirculation flow transmitters that feed the APRMs as applied to Function 2.b. The Average Power Range Monitor Simulated Thermal Power-High Function uses the recirculation loop drive flows to vary the trip setpoint. This SR ensures that the recirculation flow transmitters that supply the recirculation flow signal to the APRMs respond to the measured recirculation flow within the necessary range and accuracy by use of a standard pressure source.

As noted for SR 3.3.1.1.10, radiation detectors are excluded from CHANNEL CALIBRATION due to ALARA reasons (when the plant is operating, the radiation detectors are generally in a high radiation area; the steam tunnel). This exclusion is acceptable because the radiation detectors are passive devices, with minimal drift. The radiation detectors are calibrated in accordance with SR 3.3.1.1.16 on a 24 month Frequency.

The 92 day Frequency of SR 3.3.1.1.10 is conservative with respect to the magnitude of equipment drift assumed in the setpoint analysis. The Frequencies of SR 3.3.1.1.12, SR 3.3.1.1.15 and SR 3.3.1.1.16 are based upon the assumption of a 24 month calibration interval in the determination of the magnitude of equipment drift in the applicable setpoint analysis.

SR 3.3.1.1.11

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.1.1.11 (continued)

intended function. For the APRM Functions, this test supplements the automatic self-test functions that operate continuously in the APRM and voter channels. The APRM CHANNEL FUNCTIONAL TEST covers the APRM channels (including recirculation flow processing - applicable to Function 2.b only), the 2-Out-Of 4 voter channels, and the interface connections into the RPS trip systems from the voter channels. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology. The 184 day Frequency of SR 3.3.1.1.11 is based on the reliability analyses of References 12 and 13. (NOTE: The actual voting logic of the 2-Out-Of-4 Voter Function is tested as part of SR 3.3.1.1.17.)

A Note is provided for Function 2.a that requires this SR to be performed within 12 hours of entering MODE 2 from MODE 1. Testing of the MODE 2 APRM Function cannot be performed in MODE 1 without utilizing jumpers or lifted leads. This Note allows entry into MODE 2 from MODE 1 if the associated Frequency is not met per SR 3.0.2.

A second Note is provided for Function 2.b that clarifies that the CHANNEL FUNCTIONAL TEST for Function 2.b includes testing of the recirculation flow processing electronics, excluding the flow transmitters.

SR 3.3.1.1.13

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 ≥ 30% RTP. This involves calibration of the bypass channels. Adequate margins for the instrument setpoint methodologies are incorporated into the Allowable Value (≤ 29.4% RTP which is equivalent to ≤ 138.4 psig as measured from turbine first stage pressure) 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 the calibration at THERMAL POWER ≥ 30% RTP to ensure that the calibration is valid.

If any bypass channel's setpoint is nonconservative (i.e., the Functions are bypassed at ≥ 30% RTP, either due to open main turbine bypass valve(s) or other reasons), then the

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.1.1.13 (continued)

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 24 months is based on engineering judgment and reliability of the components.

SR 3.3.1.1.17

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required trip logic for a specific channel. The functional testing of control rods (LCO 3.1.3), and SDV vent and drain valves (LCO 3.1.8), 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 will pass the Surveillance when performed at the 24 month Frequency.

The LOGIC SYSTEM FUNCTIONAL TEST for APRM Function 2.e simulates APRM trip conditions at the 2-Out-Of-4 voter channel inputs to check all combinations of two tripped inputs to the 2-Out-Of-4 logic in the voter channels and APRM related redundant RPS relays.

SR 3.3.1.1.18

This SR ensures that the individual channel response times are maintained less than or equal to the original design value. The RPS RESPONSE TIME acceptance criterion is included in Reference 11.

RPS RESPONSE TIME tests are conducted on a 24 month Frequency. The 24 month Frequency is consistent with the PBAPS 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.

(continued)

BASES (continued)

REFERENCES

1. UFSAR, Section 7.2.

2. UFSAR, Chapter 14.

3. NEDO-32368, "Nuclear Measurement Analysis and Control Wide Range Neutron Monitoring System Licensing Report for Peach Bottom Atomic Power Station, Units 2 and 3," November 1994.

4. NEDC-32183P, "Power Rerate Safety Analysis Report for Peach Bottom 2 & 3," dated May 1993.

5. UFSAR, Section 14.6.2.

6. UFSAR, Section 14.5.4.

7. UFSAR, Section 14.5.1.

8. P. Check (NRC) letter to G. Lainas (NRC), "BWR Scram Discharge System Safety Evaluation," December 1, 1980.

9. NEDO-30851-P-A , "Technical Specification Improvement Analyses for BWR Reactor Protection System," March 1988.

10. MDE-87-0485-1, "Technical Specification Improvement Analysis for the Reactor Protection System for Peach Bottom Atomic Power Station Units 2 and 3," October 1987.

11. UFSAR, Section 7.2.3.9.

12. NEDC-32410P-A, "Nuclear Measurement Analysis and Control Power Range Neutron Monitor (NUMAC PRNM) Retrofit Plus Option III Stability Trip Function", March 1995.

13. NEDC-32410P Supplement 1, "Nuclear Measurement Analysis and Control Power Range Neutron Monitor (NUMAC PRNM) Retrofit Plus Option III Stability Trip Function, Supplement 1", November 1997.

B 3.3 INSTRUMENTATION

B 3.3.1.2 Wide Range Neutron Monitor (WRNM) Instrumentation

BASES

BACKGROUND

The WRNMs are capable of providing the operator with information relative to the neutron flux level at very low flux levels in the core. As such, the WRNM indication is used by the operator to monitor the approach to criticality and determine when criticality is achieved.

The WRNM subsystem of the Neutron Monitoring System (NMS) consists of eight channels. Each of the WRNM channels can be bypassed, but only one at any given time per RPS trip system, by the operation of a bypass switch. Each channel includes one detector that is permanently 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 WRNM 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 WRNMs.

During refueling, shutdown, and low power operations, the primary indication of neutron flux levels is provided by the WRNMs or special movable detectors connected to the normal WRNM circuits. The WRNMs 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 System (RPS) Instrumentation"; WRNM Period-Short and

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

Average Power Range Monitor (APRM) Startup High Flux Scram Functions; and LCO 3.3.2.1, "Control Rod Block Instrumentation."

The WRNMs have no safety function associated with monitoring neutron flux at very low levels and are not assumed to function during any UFSAR design basis accident or transient analysis which would occur at very low neutron flux levels. However, the WRNMs provide the only on-scale monitoring of neutron flux levels during startup and refueling. Therefore, they are being retained in Technical Specifications.

LCO

During startup in MODE 2, three of the eight WRNM channels are required to be OPERABLE to monitor the reactor flux level and reactor period prior to and during control rod withdrawal, subcritical multiplication and reactor criticality. These three required channels must be located in different core quadrants 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 WRNM channels in two different quadrants provide redundant monitoring of flux levels in the core.

In MODE 5, during a spiral offload or reload, a WRNM 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 WRNM 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 WRNM 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 WRNMs are required to be OPERABLE to provide redundant monitoring of reactivity changes in the reactor core. Because of the local nature of reactivity changes during refueling, adequate coverage is provided by requiring one WRNM to be OPERABLE for the connected fuel in the quadrant of the reactor core where

(continued)

BASES

LCO (continued)

CORE ALTERATIONS are being performed. There are two WRNMs in each quadrant. Any CORE ALTERATIONS must be performed in a region of fuel that is connected to an OPERABLE WRNM to ensure that the reactivity changes are monitored within the fueled region(s) of the quadrant. The other WRNM that is required to be OPERABLE must be in an adjacent quadrant containing fuel. These requirements ensure that the reactivity of the core will be continuously monitored during CORE ALTERATIONS.

Special movable detectors, according to footnote (c) of Table 3.3.1.2-1, may be used in place of the normal WRNM nuclear detectors. These special detectors must be connected to the normal WRNM circuits in the NMS, such that the applicable neutron flux indication can be generated. These special detectors provide more flexibility in monitoring reactivity changes during fuel loading, since they can be positioned anywhere within the core during refueling. They must still meet the location requirements of SR 3.3.1.2.2 and all other required SRs for WRNMs.

The Table 3.3.1.2-1, footnote (d), requirement provides for conservative spatial core coverage.

For a WRNM channel to be considered OPERABLE, it must be providing neutron flux monitoring indication.

APPLICABILITY

The WRNMs are required to be OPERABLE in MODES 2, 3, 4, and 5 prior to the WRNMs reading 125E-5 % power to provide for neutron monitoring. In MODE 1, the APRMs provide adequate monitoring of reactivity changes in the core; therefore, the WRNMs are not required. In MODE 2, with WRNMs reading greater than 125E-5 % power, the WRNM Period-Short function provides adequate monitoring and the WRNMs monitoring indication is not required.

ACTIONS

A.1 and B.1

In MODE 2, the WRNM channels provide the means of monitoring core reactivity and criticality. With any number of the required WRNMs inoperable, the ability to monitor neutron flux is degraded. Therefore, a limited time is allowed to restore the inoperable channels to OPERABLE status.

(continued)

BASES

ACTIONS

A.1 and B.1 (continued)

Provided at least one WRNM remains OPERABLE, Required Action A.1 allows 4 hours to restore the required WRNMs 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 WRNMs to OPERABLE status. 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 WRNM, proceeding to WRNM indication greater than 125E-5 % power, and thereby exiting the Applicability of this LCO, is acceptable for ensuring adequate core monitoring and allowing continued operation.

With three required WRNMs 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 WRNMs OPERABLE.

C.1

In MODE 2, if the required number of WRNMs 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.

D.1 and D.2

With one or more required WRNMs 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

(continued)

BASES

ACTIONS

D.1 and D.2 (continued)

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 WRNM occurring during this interval.

E.1 and E.2

With one or more required WRNMs 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 REQUIREMENTS

As noted at the beginning of the SRs, the SRs for each WRNM Applicable MODE or other specified conditions are found in the SRs column of Table 3.3.1.2-1.

SR 3.3.1.2.1 and SR 3.3.1.2.3

Performance of the CHANNEL CHECK 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 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.

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BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.1.2.1 and SR 3.3.1.2.3 (continued)

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 WRNM is required to be OPERABLE for the connected fuel in the quadrant where the CORE ALTERATIONS are being performed, and the other OPERABLE WRNM 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 WRNMs required to be OPERABLE for given CORE ALTERATIONS are, in fact, OPERABLE. In the event that only one WRNM is required to be OPERABLE, per Table 3.3.1.2-1, footnote (b), only the a. portion of this SR is required. Note 2 clarifies that more than one of the three requirements can be met by the same OPERABLE WRNM. The 12 hour Frequency is based upon operating experience and supplements operational controls over refueling activities that include steps to ensure that the WRNMs required by the LCO are in the proper quadrant.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.1.2.4

This Surveillance consists of a verification of the WRNM instrument readout to ensure that the WRNM reading is greater than a specified minimum count rate, which ensures that the detectors are indicating count rates indicative of neutron flux levels within the core. The signal-to-noise ratio shown in Figure 3.3.1.2-1 is the WRNM count rate at which there is a 95% probability that the WRNM signal indicates the presence of neutrons and only a 5% probability that the WRNM signal is the result of noise (Ref. 1). With few fuel assemblies loaded, the WRNMs 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 Note 1 that states that the count rate is not required to be met on a WRNM that has less than or equal to four fuel assemblies adjacent to the WRNM and no other fuel assemblies are in the associated core quadrant. With four or less fuel assemblies loaded around each WRNM and no other fuel assemblies in the associated core quadrant, even with a control rod withdrawn, the configuration will not be critical. In addition, Note 2 states that this requirement does not have to be met during spiral unloading. If the core is being unloaded in this manner, the various core configurations encountered will not be critical.

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.

SR 3.3.1.2.5

Performance of a CHANNEL FUNCTIONAL TEST demonstrates the associated channel will function properly. SR 3.3.1.2.5 is required in MODES 2,3,4 and 5 and the 31 day Frequency ensures that the channels are OPERABLE while core reactivity

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.1.2.5 (continued)

changes could be in progress. This Frequency is reasonable, based on operating experience, fixed incore detectors, overall reliability, self-monitoring features, and on other Surveillances (such as a CHANNEL CHECK), that ensure proper functioning between CHANNEL FUNCTIONAL TESTS.

Verification of the signal to noise ratio also ensures that the detectors are correctly monitoring the neutron fux.

The Note to the Surveillance allows the Surveillance to be delayed until entry into the specified condition of the Applicability (THERMAL POWER decreased to WRNM reading of 125E-5 % power or below). The SR must be performed within 12 hours after WRNMs are reading 125E-5 % power 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. Although the Surveillance could be performed while at higher power, 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 WRNMs being otherwise verified to be OPERABLE (i.e., satisfactorily performing the CHANNEL CHECK) and the time required to perform the Surveillances.

SR 3.3.1.2.6

Performance of a CHANNEL CALIBRATION at a Frequency of 24 months verifies the performance of the WRNM 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. Note 1 excludes the neutron detectors from the CHANNEL CALIBRATION 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.

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BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.1.2.6 (continued)

Note 2 to the Surveillance allows the Surveillance to be delayed until entry into the specified condition of the Applicability. The SR must be performed in MODE 2 within 12 hours of entering MODE 2 with WRNMs reading 125E-5 % power 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. Although the Surveillance could be performed while at higher power, 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 WRNMs being otherwise verified to be OPERABLE (i.e., satisfactorily performing the CHANNEL CHECK) and the time required to perform the Surveillance.

REFERENCES

1. NRC Safety Evaluation Report for Amendment Numbers 147 and 149 to Facility Operating License Numbers DPR-44 and DPR-56, Peach Bottom Atomic Power Station, Unit Nos. 2 and 3, August 28, 1989.

B 3.3 INSTRUMENTATION

B 3.3.2.1 Control Rod Block Instrumentation

BASES

BACKGROUND

Control rods provide the primary means for control of 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. 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 low power range setpoint. 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 at various core heights surrounding the control rod being withdrawn. A signal from one of the four redundant average power range monitor (APRM) channels supplies a reference signal for one of the RBM channels and a signal from another of the APRM channels supplies the reference signal to the second RBM channel. This reference signal is used to determine which RBM range setpoint (low, intermediate, or high) is enabled. If the APRM is indicating less than the low power range setpoint, the RBM is automatically bypassed. The RBM is also automatically bypassed if a peripheral control rod is selected (Ref. 1). A rod block signal is also generated if an RBM inoperable trip occurs, since this could indicate a problem with the RBM channel.

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BASES

BACKGROUND (continued)

The inoperable trip will occur if, during the nulling (normalization) sequence, the RBM channel fails to null or too few LPRM inputs are available, if a critical self-test fault has been detected, or the RBM instrument mode switch is moved to any position other than "Operate".

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. Prescribed control rod sequences are 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 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 shutdown position. The reactor mode switch has two channels, each inputting into a separate RMCS rod block circuit. A rod block in either RMCS circuit will provide a control rod block to all control rods.

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

1. Rod Block Monitor

The RBM is designed to prevent violation of the MCPR SL and the cladding 1% plastic strain fuel design limit that may result from a single control rod withdrawal error (RWE) event. The analytical methods and assumptions used in evaluating the RWE event are summarized in Reference 1. A

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

1. Rod Block Monitor (continued)

statistical analysis of RWE events was performed to determine the RBM response for both channels for each event. From these responses, the fuel thermal performance as a function of RBM Allowable Value was determined. The Allowable Values are chosen as a function of power level. The Allowable Values are specified in the CORE OPERATING LIMITS REPORT (COLR). Based on the specified Allowable Values, operating limits are established.

The RBM Function satisfies Criterion 3 of the NRC Policy Statement.

Two channels of the RBM are required to be OPERABLE, with their setpoints within the appropriate Allowable Values to ensure that no single instrument failure can preclude a rod block from this Function. The actual setpoints are calibrated consistent with applicable setpoint methodology.

Trip setpoints are specified in the setpoint calculations. The trip setpoints are selected to ensure that the setpoints do not exceed the Allowable Values between successive CHANNEL CALIBRATIONS. Operation with a trip setting less conservative than the trip setpoint, but within its Allowable Value, is acceptable. 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 power), and when the measured output value of the process parameter exceeds the setpoint, the associated device (e.g., trip unit) changes state. The analytic or design limits are derived from the limiting values of the process parameters obtained from the safety analysis or other appropriate documents. The Allowable Values are derived from the analytic or design limits, corrected for calibration, process, and instrument errors. The trip setpoints are determined from analytical or design limits, corrected for calibration, process, and instrument errors, as well as, instrument drift. In selected cases, the Allowable Values and trip setpoints are determined by engineering judgement or historically accepted practice relative to the intended function of the channel. The trip setpoints determined in this manner provide adequate protection by assuring instrument and process uncertainties expected for the environments during the operating time of the channels are accounted for.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

1. Rod Block Monitor (continued)

The RBM is assumed to mitigate the consequences of an RWE event when operating ≥ 30% RTP. Below this power level, the consequences of an RWE event will not exceed the MCPR SL and, therefore, the RBM is not required to be OPERABLE (Ref. 1). When operating < 90% RTP, analyses (Ref. 1) have shown that with an initial MCPR ≥ 1.70, no RWE event will result in exceeding the MCPR SL. Also, the analyses demonstrate that when operating at ≥ 90% RTP with MCPR ≥ 1.40, no RWE event will result in exceeding the MCPR SL (Ref. 1). Therefore, under these conditions, the RBM is also not required to be OPERABLE.

2. Rod Worth Minimizer

The RWM enforces the banked position withdrawal sequence (BPWS) 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 3, 4, 5, and 6. The BPWS 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 BPWS are specified in LCO 3.1.6, "Rod Pattern Control."

The RWM Function satisfies Criterion 3 of the NRC Policy Statement.

Since the RWM is a hardwired system designed to act as a backup to operator control of the rod sequences, only one channel of the RWM is available and required to be OPERABLE (Ref. 6). 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 BPWS. 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.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

2. Rod Worth Minimizer (continued)

Compliance with the BPWS, and therefore OPERABILITY of the RWM, is required in MODES 1 and 2 when THERMAL POWER is < 10% RTP. When THERMAL POWER is > 10% RTP, there is no possible control rod configuration that results in a control rod worth that could exceed the 280 cal/gm fuel damage limit during a CRDA (Refs. 4 and 6). 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 required to be 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 the NRC Policy Statement.

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.

During shutdown conditions (MODE 3, 4, or 5), 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.

(continued)

BASES (continued)

ACTIONS

A.1

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.

B.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

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 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

(continued)

BASES

ACTIONS

C.1, C.2.1.1, C.2.1.2, and C.2.2 (continued)

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 qualified member of the technical staff. 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.

D.1

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 qualified member of the technical staff. The RWM may be bypassed under these conditions to allow the reactor shutdown to continue.

E.1 and E.2

With one Reactor Mode Switch—Shutdown Position control rod 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 having one or two channels inoperable.

In both cases (one or both channels inoperable), suspending 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

(continued)

BASES

ACTIONS

E.1 and E.2 (continued)

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 REQUIREMENTS

As noted at the beginning of the SRs, the SRs for each Control Rod Block instrumentation Function are found in the SRs column of Table 3.3.2.1-1.

The Surveillances are modified by a 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 (Refs. 8, 9, & 10) assumptions of the average time required to perform channel surveillances. 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.

SR 3.3.2.1.1

A CHANNEL FUNCTIONAL TEST is performed for each RBM channel to ensure that the entire channel will perform the intended function. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology. The Frequency of 184 days is based on reliability analyses (Refs. 7, 9 & 10).

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.2.1.2 and SR 3.3.2.1.3

A CHANNEL FUNCTIONAL TEST is performed for the RWM to ensure that the entire system will perform the intended function. 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 blockoccurs. SR 3.3.2.1.2 is performed during a startup and SR 3.3.2.1.3 is performed during a shutdown (or power reduction to ≤ 10% RTP). 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 ≤ 10% RTP in MODE 2. As noted, SR 3.3.2.1.3 is not required to be performed until 1 hour after THERMAL POWER is ≤ 10% RTP in MODE 1. This allows entry at ≤ 10% RTP in MODE 2 for SR 3.3.2.1.2 and entry into MODE 1 when THERMAL POWER is ≤ 10% RTP for SR 3.3.2.1.3 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. The Frequencies are based on reliability analysis (Ref. 7).

SR 3.3.2.1.4

The RBM setpoints are automatically varied as a function of power. Three Allowable Values are specified in the COLR, each within a specific power range. The power at which the control rod block Allowable Values automatically change are based on the APRM signal's input to each RBM channel. Below the minimum power setpoint, the RBM is automatically bypassed. These power Allowable Values must be verified using a simulated or actual signal periodically to be less than or equal to the specified values. If any power range setpoint is nonconservative, then the affected RBM channel is considered inoperable. Alternatively, the power range

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.2.1.4 (continued)

channel can be placed in the conservative condition (i.e., enabling the proper RBM setpoint). 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 3.3.1.1.8. The 24 month Frequency is based on the actual trip setpoint methodology utilized for these channels.

SR 3.3.2.1.5

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 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 3.3.1.1.8. 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)

SR 3.3.2.1.6

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. 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 SR.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.2.1.7 (continued)

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 will pass the Surveillance when performed at the 24 month Frequency.

SR 3.3.2.1.8

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.

REFERENCES

1. NEDC-32162-P, "Maximum Extended Load Line Limit and ARTS Improvement Program Analysis for Peach Bottom Atomic Power Station, Units 2 and 3," Revision 1, February 1993.

2. UFSAR, Sections 7.10.3.4.8 and 7.16.3.

3. NEDE-24011-P-A-10-US, "General Electric Standard Application for Reload Fuel," Supplement for United States, Section S 2.2.3.1, February 1991.

4. "Modifications to the Requirements for Control Rod Drop Accident Mitigating Systems," BWR Owners' Group, July 1986.

5. NEDO-21231, "Banked Position Withdrawal Sequence," January 1977.

6. 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.

(continued)

BASES

REFERENCES (continued)

7. NEDC-30851-P-A, "Technical Specification Improvement Analysis for BWR Control Rod Block Instrumentation," October 1988.

8. GENE-770-06-1, "Addendum to Bases for Changes to Surveillance Test Intervals and Allowed Out-of-Service Times for Selected Instrumentation Technical Specifications," February 1991.

9. NEDC-32410P-A, "Nuclear Measurement Analysis and Control Power Range Neutron Monitor (NUMAC PRNM) Retrofit Plus Option III Stability Trip Function", March 1995.

10. NEDC-32410P Supplement 1, "Nuclear Measurement Analysis and Control Power Range Neutron Monitor (NUMAC PRNM) Retrofit Plus Option III Stability Trip Function, Supplement 1", November 1997.

B 3.3 INSTRUMENTATION

B 3.3.2.2 Feedwater and Main Turbine High Water Level Trip Instrumentation

BASES

BACKGROUND

The feedwater 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 setpoint, causing the trip of the three feedwater pump turbines and the main turbine.

Digital Feedwater Control System (DFCS) high water level signals are provided by six level sensors. However, only three narrow range level sensors are required to perform the function with sufficient redundancy. The three level sensors 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). The three level signals are input into two redundant digital control computers. Any one of the three signals is automatically selected (by the digital control computer) as the signal to be used for the high level trip.

Each digital control computer has two redundant digital outputs (channels) to provide redundant signals to an associated trip system. Each digital control computer processes input signals and compares them to pre-established setpoints. When the setpoint is exceeded, the two digital outputs actuate two contacts arranged in parallel so that either digital output can trip the associated trip system. The tripping of both digital computer trip systems will initiate a trip of the feedwater pump turbines and the main turbine.

A trip of the feedwater pump turbines 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.

(continued)

BASES (continued)

APPLICABLE SAFETY ANALYSES

The feedwater and main turbine high water level trip instrumentation is assumed to be capable of providing a turbine trip in the design basis transient analysis for a feedwater controller failure, maximum demand event (Ref. 1). The high water level trip indirectly initiates a reactor scram from the main turbine trip (above 30% RTP) and trips the feedwater pumps, thereby terminating the event. The reactor scram mitigates the reduction in MCPR.

Feedwater and main turbine high water level trip instrumentation satisfies Criterion 3 of the NRC Policy Statement.

LCO

The LCO requires two DFCS channels per trip system of high water level trip instrumentation to be OPERABLE to ensure the feedwater pump turbines and main turbine will trip on a valid reactor vessel high water level signal. Two DFCS channels (one per trip system) are needed to provide trip signals in order for the feedwater and main turbine trips to occur.

Two level signals are also required to ensure a single sensor failure will not prevent the trips of the feedwater pump turbines and main turbine when reactor vessel water level is at the high water level reference point.

Each channel must have its setpoint set within the specified Allowable Value of SR 3.3.2.2.3. 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. Trip setpoints are specified in the setpoint calculations. The trip setpoints are selected to ensure that the setpoints do not exceed the Allowable Value between successive CHANNEL CALIBRATIONS. Operation with a trip setting less conservative than the trip setpoint, but within its Allowable Value, is acceptable.

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 or design limits are derived from the limiting values of the process parameters obtained from the safety analysis or

(continued)

BASES

LCO (continued)

other appropriate documents. The Allowable Values are derived from the analytic or design limits, corrected for calibration, process, and instrument errors. A channel is inoperable if its actual trip setting is not within its required Allowable Value. The trip setpoints are determined from analytical or design limits, corrected for calibration, process and instrument errors, as well as, instrument drift. The trip setpoints determined in this manner provide adequate protection by assuring instrument and process uncertainties expected for the environment during the operating time for the associated channels are accounted for.

APPLICABILITY

The feedwater and main turbine high water level trip instrumentation is required to be OPERABLE at ≥ 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)," and LCO 3.2.2, "MINIMUM CRITICAL POWER RATIO (MCPR)," sufficient margin to these limits exists below 25% RTP; therefore, these requirements are only necessary when operating at or above this power level.

ACTIONS

A Note has been provided to modify the ACTIONS related to feedwater 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 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 and main turbine high water level trip instrumentation channel.

(continued)

BASES

ACTIONS (continued)

A.1

With one or more feedwater and main turbine high water level trip channels inoperable, but with feedwater and main turbine high water level trip capability maintained (refer to Required Action B.1 Bases), the remaining OPERABLE channels can provide the required trip signal. However, overall instrumentation reliability is reduced because a single active instrument failure in one of the remaining channels may result in the instrumentation not being able to perform its intended function. Therefore, continued operation is only allowed for a limited time with one or more channels inoperable. If the inoperable channels cannot be restored to OPERABLE status within the Completion Time, the channels must be placed in the tripped condition per Required Action A.1. Placing the inoperable channel in trip would conservatively compensate for the inoperability, restore capability to accommodate a single active instrument failure, and allow operation to continue with no further restrictions. 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 the feedwater and main turbine trip), Condition C must be entered and its Required Action taken.

The Completion Time of 72 hours is based on the low probability of the event occurring coincident with a single failure in a remaining OPERABLE channel.

B.1

Required Action B.1 is intended to ensure that appropriate actions are taken if multiple, inoperable, untripped channels result in the High Water Level Function of DFCS not maintaining feedwater and main turbine trip capability. In this condition, the feedwater 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 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 and main turbine high water level trip logic will generate a trip

(continued)

BASES

ACTIONS

B.1 (continued)

signal on a valid signal. This requires one channel per 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.

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 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.

C.1

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, 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 and main turbine high water level trip instrumentation is not required to protect fuel integrity during the feedwater controller failure, maximum demand event. 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 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) assumption of the average time required to perform

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

channel Surveillance. That analysis demonstrated that the 6 hour testing allowance does not significantly reduce the probability that the feedwater pump turbines and main turbine will trip when necessary.

SR 3.3.2.2.1

Performance of the CHANNEL CHECK once every 24 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. The CHANNEL CHECK may be performed by comparing indication or by verifying the absence of the DFCS "TROUBLE" alarm in the control room. 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 entire channel will perform the intended function. 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).

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.2.2.3

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 assumptions of the current 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.

SR 3.3.2.2.4

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required trip logic for a specific channel. The system functional test of the feedwater 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 stop valve is incapable of operating, the associated instrumentation channels 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 that these components will pass the Surveillance when performed at the 24 month Frequency.

REFERENCES

1. UFSAR, Section 14.5.2.2.

2. GENE-770-06-1, "Bases for Changes to Surveillance Test Intervals and Allowed Out-Of-Service Times for Selected Instrumentation Technical Specifications," February 1991.

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 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:

- 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

- 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.

The PAM instrumentation LCO also ensures OPERABILITY of Category I, non-Type A, variables so that the control room operating staff can:

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

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

- Determine the potential for causing a gross breach of the barriers to radioactivity release;
- Determine whether a gross breach of a barrier has occurred; and
- Initiate action necessary to protect the public and for an estimate of the magnitude of any impending threat.

The plant specific Regulatory Guide 1.97 Analysis (Refs. 2, 3, and 4) 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 the NRC Policy Statement. 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 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 that accident. Furthermore, provision of 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 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 valves in this state is not required to be OPERABLE.

(continued)

BASES

LCO (continued)

The following list is a discussion of the specified instrument Functions listed in Table 3.3.3.1-1 in the accompanying LCO.

1. Reactor Pressure

Instruments: PR-3-2-3-404 A, B

Reactor pressure is a 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 associated independent wide range recorders are the primary indication used by the operator during an accident. Therefore, the PAM Specification deals specifically with this portion of the instrument channel.

2, 3. Reactor Vessel Water Level (Wide Range and Fuel Zone)

Instruments: Wide Range: LR-3-2-3-110 A, B (Green Pen)
Fuel Zone: LR-3-2-3-110 A, B (Blue Pen)

Reactor vessel water level is a Category I variable provided to support monitoring of core cooling and to verify operation of the ECCS. The wide range and fuel zone water level channels provide the PAM Reactor Vessel Water Level Functions. The ranges of the wide range water level channels and the fuel zone water level channels overlap to cover a range of -325 inches (just below the bottom of the active fuel) to +50 inches (above the normal water level). Reactor vessel water level is measured by separate differential pressure transmitters. The output from these channels is recorded on two independent pen recorders, which is the primary indication used by the operator during an accident. Each recorder has two channels, one for wide range reactor vessel water level and one for fuel zone reactor vessel water level. Therefore, the PAM Specification deals specifically with these portions of the instrument channels.

(continued)

BASES

LCO (continued)

4. Suppression Chamber Water Level (Wide Range)

Instruments: LR-9123 A, B

Suppression chamber water level is a 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 suppression chamber 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 recorders monitor the suppression chamber water level from the bottom of the ECCS suction lines to five feet above normal water level. Two wide range suppression chamber water level signals are transmitted from separate differential pressure transmitters and are continuously recorded on two recorders in the control room. 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 channel.

5, 6. Drywell Pressure (Wide Range and Subatmospheric Range)

Instruments: Wide Range: PR-9102 A, B (Red Pen)
Subatmospheric Range: PR-9102 A, B (Green Pen)

Drywell pressure is a Category I variable provided to detect breach of the RCPB and to verify ECCS functions that operate to maintain RCS integrity. The wide range and subatmospheric range drywell pressure channels provide the PAM Drywell Pressure Functions. The wide range and subatmospheric range drywell pressure channels overlap to cover a range of 5 psia to 225 psig (in excess of four times the design pressure of the drywell). Drywell pressure signals are transmitted from separate pressure transmitters and are continuously recorded and displayed on two independent control room recorders. Each recorder has two channels, one for wide range drywell pressure and one for subatmospheric range drywell pressure. These recorders are the primary indication used by the operator during an accident. Therefore, the PAM Specification deals specifically with these portions of the instrument channels.

(continued)

BASES

LCO (continued)

7. Drywell High Range Radiation

Instruments: RR-9103 A, B (Green Pen)

Drywell high range radiation is a Category I 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. Post accident drywell radiation levels are monitored by four instrument channels each with a range of 1 to $1x10^{7}$ R/hr. These radiation monitors drive two dual channel recorders located in the control room. Each recorder and the two associated channels are in a separate division. As such, two recorders and two channels of radiation monitoring instrumentation (one per recorder) are required to be OPERABLE for compliance with this LCO. Therefore, the PAM Specification deals specifically with these portions of the instrument channels.

8. Primary Containment Isolation Valve (PCIV) Position

PCIV position is a Category I 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, i.e., two total channels of PCIV position indication for a penetration flow path with two active valves. For containment penetrations with only one 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. The PCIV position PAM instrumentation consists of position switches, associated wiring and control room indicating lamps for active PCIVs (check valves and manual valves are not required to have position indication). Therefore, the PAM Specification deals specifically with these instrument channels.

(continued)

BASES

LCO (continued)

9, 10. Drywell and Suppression Chamber Hydrogen and Oxygen Analyzers

Instruments: XR-90411A, XR-90411B

Drywell and suppression chamber hydrogen and oxygen analyzers 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. The drywell and suppression chamber hydrogen and oxygen analyzer PAM instrumentation consists of two independent gas analyzers. Each gas analyzer can determine either hydrogen or oxygen concentration. The analyzers are capable of determining hydrogen concentration in the range of 0 to 30% by volume and oxygen concentration in the range of 0 to 10% by volume. Each gas analyzer must be capable of sampling either the drywell or the suppression chamber. The hydrogen and oxygen concentration from each analyzer are displayed on its associated control room recorder. Therefore, the PAM Specification deals specifically with these portions of the analyzer channels.

11. Suppression Chamber Water Temperature

Instruments: TR-9123 A, B
TIS-3-2-71 A, B

Suppression chamber water temperature is a 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 suppression chamber water temperature instrumentation allows operators to detect trends in suppression chamber water temperature in sufficient time to take action to prevent steam quenching vibrations in the suppression pool. Suppression chamber water temperature is monitored by two redundant channels. Each channel is assigned to a separate safeguard power division. Each channel consists of 13 resistance temperature detectors (RTDs) mounted in thermowells installed in the suppression chamber shell below the minimum water level, a processor, and control room recorder. The RTDs are mounted in each of 13 of the 16 segments of the suppression chamber. The RTD

(continued)

BASES

LCO (continued)

inputs are averaged by the processor to provide a bulk average temperature output to the associated control room recorder. The allowance that only 10 RTDs are required to be OPERABLE for a channel to be considered OPERABLE provided no 2 adjacent RTDs are inoperable is acceptable based on engineering judgement considering the temperature response profile of the suppression chamber water volume for previously analyzed events and the most challenging RTDs inoperable. 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 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

(continued)

BASES

Actions (continued)

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.

A.1

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, in the case of a Function that has only one required channel, other non-Regulatory Guide 1.97 instrument channels to monitor the Function), the passive nature of the instrument (no critical automatic action is assumed to occur from these instruments), and the low probability of an event requiring PAM instrumentation during this interval.

B.1

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 action is appropriate in lieu of a shutdown requirement, since alternative actions are identified before loss of functional capability, and given the likelihood of plant conditions that would require information provided by this instrumentation.

C.1

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

(continued)

BASES

Actions

C.1 (continued)

channels inoperable in a Function is not acceptable because the alternate indications may not fully meet all performance qualification requirements applied to the PAM instrumentation. Therefore, requiring restoration of one inoperable channel of the Function limits the risk that the PAM Function will be in a degraded condition should an accident occur.

D.1

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.

E.1

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 in which the LCO 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.

F.1

Since alternate means of monitoring drywell high range 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.

(continued)

BASES (continued)

SURVEILLANCE REQUIREMENTS

SR 3.3.3.1.1

Performance of the CHANNEL CHECK once every 31 days ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel 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 isolation, indication, and readability. If a channel is outside the criteria, it may be an indication that the sensor or the signal processing equipment has drifted outside its limit.

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.

SR 3.3.3.1.2 and SR 3.3.3.1.3

These SRs require CHANNEL CALIBRATIONs to be performed. A 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 the PCIV Position Function, the CHANNEL CALIBRATION consists of verifying the remote indication conforms to actual valve position.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.3.1.2 and SR 3.3.3.1.3 (continued)

The 92 day Frequency for CHANNEL CALIBRATION of the drywell and suppression chamber hydrogen and oxygen analyzers is based on vendor recommendations. The 24 month Frequency for CHANNEL CALIBRATION of all other PAM instrumentation of Table 3.3.3.1-1 is based on operating experience and consistency with the Peach Bottom Atomic Power Station refueling cycles.

REFERENCES

1. Regulatory Guide 1.97, "Instrumentation for Light Water Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident," Revision 3, May 1983.

2. NRC Safety Evaluation Report, "Peach Bottom Atomic Power Station, Unit Nos. 2 and 3, Conformance to Regulatory Guide 1.97," January 15, 1988.

3. Letter from G. Y. Suh (NRC) to G. J. Beck (PECo) dated February 13, 1991 concerning "Conformance to Regulatory Guide 1.97 for Peach Bottom Atomic Power Station, Units 2 and 3".

4. Letter from S. Dembek (NRC) to G. A. Hunger (PECO Energy) dated March 7, 1994 concerning "Regulatory Guide 1.97 - Boiling Water Reactor Neutron Flux Monitoring, Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3".