

June 22, 1999

Mr. W. R. McCollum, Jr.  
Vice President, Oconee Site  
Duke Energy Corporation  
P. O. Box 1439  
Seneca, SC 29679

SUBJECT: OCONEE NUCLEAR STATION, UNITS 1, 2, AND 3 RE: TECHNICAL SPECIFICATION BASES CHANGES

Dear Mr. McCollum:

By two letters dated June 14, 1999, you informed the staff of changes to the Oconee Nuclear Station, Units 1, 2, and 3 Improved Technical Specifications (ITS) Bases Sections B 3.1.3, 3.3.1, 3.3.5, 3.3.8, 3.3.15, 3.5.4, 3.7.2, and 3.9.2. The purpose of the changes is to clarify and enhance these sections of the ITS.

The purpose of this letter is to distribute the attached revised ITS pages to the appropriate TS manual holders.

Sincerely,

Original signed by:  
David E. LaBarge, Senior Project Manager, Section 1  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-269, 50-270, and 50-287

Enclosure: Revised Bases Page

cc w/encl: See next page

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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## B 3.1 REACTIVITY CONTROL SYSTEMS

### B 3.1.3 Moderator Temperature Coefficient (MTC)

#### BASES

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#### BACKGROUND

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

The MTC relates a change in core reactivity to a change in reactor coolant temperature (a positive MTC means that reactivity increases with increasing moderator temperature; conversely, a negative MTC means that reactivity decreases with increasing moderator temperature). Therefore, a coolant temperature increase will cause a reactivity decrease with a negative MTC. Reactivity increases that cause a coolant temperature increase will thus be self limiting. The same characteristic is true when the MTC is positive and coolant temperature decreases occur.

MTC values are predicted at selected burnups during the safety evaluation analysis and are confirmed to be acceptable by measurements. Reactor cores are designed so that the beginning of cycle (BOC) MTC is less than or equal to zero when THERMAL POWER is 95% RTP or greater. The actual value of the MTC is dependent on core characteristics, such as fuel loading and reactor coolant soluble boron concentration. The core design may require additional burnable absorbers to yield an MTC at BOC within the range analyzed in the accident analysis. The end of cycle (EOC) MTC is also limited by the requirements of the accident analysis. Fuel cycles that are designed to achieve high burnups or that have changes to other characteristics are evaluated to ensure the MTC does not become more negative than the value assumed in the safety analyses.

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(continued)

BASES

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BACKGROUND  
(continued)

Trip Setpoints/Allowable Value (continued)

inoperable if its actual trip setpoint is not within its required Allowable Value. All field sensors and signal processing equipment for these channels are assumed to operate within the allowances of these uncertainty magnitudes. The trip setpoints are the nominal values at which the bistables are set. Any bistable is considered to be properly adjusted when the "as left" value is within the band for CHANNEL CALIBRATION accuracy. A detailed description of the methodology used to determine the Allowable Value, trip setpoints and associated uncertainties is provided in Reference 4.

Setpoints in accordance with the Allowable Value ensure that the limits of Chapter 2.0, "Safety Limits," in the Technical Specifications are not violated during anticipated transients and that the consequences of accidents will be acceptable, providing the unit is operated from within the LCOs at the onset of the anticipated transient or accident and the equipment functions as designed. Note that in LCO 3.3.1 the Allowable Values listed in Table 3.3.1-1 for Functions 1 through 8 and 11 are the LSSS.

Each channel can be tested online to verify that the setpoint accuracy is within the specified allowance requirements. Once a designated channel is taken out of service for testing, a simulated signal is injected in place of the field instrument signal. Surveillances for the channels are specified in the SR section.

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APPLICABLE  
SAFETY ANALYSES,  
LCO, and  
APPLICABILITY

Each of the analyzed accidents and transients that require a reactor trip to meet the acceptance criteria can be detected by one or more RPS Functions. The accident analysis contained in the UFSAR, Chapter 15 (Ref. 2), takes credit for most RPS trip Functions. Functions not specifically credited in the accident analysis were qualitatively credited in the safety analysis and the NRC staff approved licensing basis for the unit. These Functions are high RB pressure, high RCS temperature, turbine trip, and loss of main feedwater. These Functions may provide protection for conditions that do not require dynamic transient analysis to demonstrate Function performance. These Functions also serve as backups to

(continued)

BASES

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APPLICABLE  
SAFETY ANALYSES,  
LCO, and  
APPLICABILITY  
(continued)

Functions that were credited in the safety analysis. The LCO requires all instrumentation performing an RPS Function to be OPERABLE. Failure of any instrument renders LCO, and the affected channel(s) inoperable and reduces the reliability of the affected Functions. The three channels of each Function in Table 3.3.1-1 of the RPS instrumentation shall be OPERABLE during its specified Applicability to ensure that a reactor trip will be actuated if needed. Additionally, during shutdown bypass with any CRD trip breaker closed, the applicable RPS Functions must also be available. This ensures the capability to trip the withdrawn CONTROL RODS exists at all times that rod motion is possible. The trip Function channels specified in Table 3.3.1-1 are considered OPERABLE when all channel components necessary to provide a reactor trip are functional and in service for the required MODE or Other Specified Condition listed in Table 3.3.1-1.

Only the Allowable Values are specified for each RPS trip Function in the LCO. Nominal trip setpoints are specified in the setpoint calculations. The nominal setpoints are selected to ensure that the setpoint measured by CHANNEL FUNCTIONAL TESTS does not exceed the Allowable Value if the bistable is performing as required. A trip setpoint found less conservative than the nominal trip setpoint, but within its Allowable Value, is considered OPERABLE with respect to the uncertainty allowances assumed for the applicable surveillance interval provided that operation, testing and subsequent calibration are consistent with the assumptions of the setpoint calculations. Each Allowable Value specified is more conservative than instrument uncertainties appropriate to the trip Function. These uncertainties are defined in Reference 4.

For most RPS Functions, the Allowable Value in conjunction with the nominal trip setpoint ensure that the departure from nucleate boiling (DNB), centerline fuel melt, or RCS pressure SLs are not challenged. Cycle specific values for use during operation are contained in the COLR.

Certain RPS trips function to indirectly protect the SLs by detecting specific conditions that do not immediately challenge SLs but will eventually lead to challenge if no action is taken. These trips function to minimize the unit transients caused by the specific conditions. The Allowable Value for these Functions is selected at the minimum

(continued)

BASES

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APPLICABLE  
SAFETY ANALYSES,  
LCO, and  
APPLICABILITY  
(continued)

deviation from normal values that will indicate the condition, without risking spurious trips due to normal fluctuations in the measured parameter. The Allowable Values for bypass removal Functions are stated in the Applicable MODE or Other Specified Condition column of Table 3.3.1-1.

The safety analyses applicable to each RPS Function are discussed next.

1. Nuclear Overpower

a. Nuclear Overpower—High Setpoint

The Nuclear Overpower—High Setpoint trip provides protection for the design thermal overpower condition based on the measured out of core neutron leakage flux.

The Nuclear Overpower—High Setpoint trip initiates a reactor trip when the neutron power reaches a predefined setpoint at the design overpower limit. Because THERMAL POWER lags the neutron power, tripping when the neutron power reaches the design overpower will limit THERMAL POWER to prevent exceeding acceptable fuel damage limits.

Thus, the Nuclear Overpower—High Setpoint trip protects against violation of the DNBR and fuel centerline melt SLs. However, the RCS Variable Low Pressure, and Nuclear Overpower Flux/Flow Imbalance, provide more direct protection. The role of the Nuclear Overpower—High Setpoint trip is to limit reactor THERMAL POWER below the highest power at which the other two trips are known to provide protection.

The Nuclear Overpower—High Setpoint trip also provides transient protection for rapid positive reactivity excursions during power operations. These events include the rod withdrawal accident and the rod ejection accident. By providing a trip during these events, the Nuclear Overpower—High Setpoint trip protects the unit

(continued)



BASES

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BACKGROUND

Reactor Building Pressure (continued)

The ESPS channels of the Reactor Building Spray System are formed by two identical two-out-of-three logic networks with the active elements originating in six Reactor Building pressure sensing pressure switches.

Three independent pressure switches containing normally open contacts from one protective channel's two-out-of-three logic inputs. Three other identical pressure switches from the two-out-of-three logic inputs of the second protective channel. Either of the two protective channels is capable of initiating the required protective action.

Trip Setpoints and Allowable Values

Trip setpoints are the nominal value at which the bistables are set. Any bistable is considered to be properly adjusted when the "as left" value is within the band for CHANNEL CALIBRATION accuracy.

The trip setpoints used in the bistables are selected such that adequate protection is provided when all sensor and processing time delays are taken into account. To allow for calibration tolerances, instrumentation uncertainties, instrument drift, and severe environment induced errors for those ESPS channels that must function in harsh environments as defined by 10 CFR 50.49 (Ref. 2), the Allowable Values specified in Table 3.3.5-1 in the accompanying LCO are conservatively adjusted with respect to the analytical limits. A detailed description of the methodology used to calculate the trip setpoints and associated uncertainties is provided in the Reference 3. The actual nominal trip setpoint entered into the bistable is more conservative than that specified by the Allowable Value to account for changes in random measurement errors detectable by a CHANNEL FUNCTIONAL TEST. A channel is inoperable if its actual trip setpoint is not within its required Allowable Value.

Setpoints, in accordance with the Allowable Values, ensure that the consequences of accidents will be acceptable, providing the unit is operated from within the LCOs at the onset of the accident and the equipment functions as designed.

(continued)

BASES

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ACTIONS

E.1 (continued)

channel. Continuous operation with one of the two required channels inoperable is not acceptable because alternate indications are not available. This indication is crucial in determining when the water source for ECCS should be swapped from the BWST to the reactor building sump.

Condition E is modified by a Note indicating this Condition is only applicable to PAM Function 14.

F.1

When a flow instrument channel is inoperable, Required Action F.1 requires the affected HPI, LPI, or RBS train to be declared inoperable and the requirements of LCO 3.5.2, LCO 3.5.3, or LCO 3.6.5 apply. For Function 22, LPSW flow to LPI coolers, the affected train is the associated LPI train. For Function 18, HPI flow, an inoperable flow instrument channel causes the affected HPI train's automatic function to be inoperable. The HPI train continues to be manually OPERABLE provided the HPI discharge crossover valves and associated flow instruments are OPERABLE. Therefore, HPI is in a condition where one HPI train is incapable of being automatically actuated but capable of being manually actuated. The required Completion Time for declaring the train(s) inoperable is immediately. Therefore, LCO 3.5.2, LCO 3.5.3, or LCO 3.6.5 is entered immediately, and the Required Actions in the LCOs apply without delay. This action is necessary since there is no alternate flow indication available and these flow indications are key in ensuring each train is capable of performing its function following an accident. HPI, LPI, and RBS train OPERABILITY assumes that the associated PAM flow instrument is OPERABLE because this indication is used to throttle flow during an accident and assure runout limits are not exceeded or to ensure the associated pumps do not exceed NPSH requirements.

Condition F is modified by a Note indicating this Condition is only applicable to PAM Functions 18, 19, 20, and 22.

(continued)

BASES

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ACTIONS  
(continued)

G.1

Required Action G.1 directs entry into the appropriate Condition referenced in Table 3.3.8-1. The applicable Condition referenced in the Table is Function dependent. Each time an inoperable channel has not met the Required Action and associated Completion Time of Condition C, D, or E, as applicable, Condition G is entered for that channel and provides for transfer to the appropriate subsequent Condition.

H.1 and H.2

If the Required Action and associated Completion Time of Conditions C, D or E are not met and Table 3.3.8-1 directs entry into Condition H, the unit must be brought to a MODE in which the requirements of this LCO do not apply. To achieve this status, the unit must be brought to at least MODE 3 within 12 hours and MODE 4 within 18 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

I.1

If the Required Action and associated Completion Time of Condition C, D or E are not met and Table 3.3.8-1 directs entry into Condition I, alternate means of monitoring the parameter should be applied and the Required Action is not to shut down the unit, but rather to follow the directions of Specification 5.6.6 in the Administrative Controls section of the Technical Specifications. These alternative means may be temporarily installed if the normal PAM channel cannot be restored to OPERABLE status within the allowed time. The report provided to the NRC should discuss the alternative means used, describe the degree to which the alternative 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.

Both the RCS Hot Leg Level and the Reactor Vessel Level are methods of monitoring for inadequate core cooling capability. The subcooled margin monitors (SMM), and core-exit thermocouples (CET) provide an alternate means of monitoring

(continued)

BASES

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ACTIONS

I.1 (continued)

for this purpose. The function of the ICC instrumentation is to increase the ability of the unit operators to diagnose the approach to and recovery from ICC. Additionally, they aid in tracking reactor coolant inventory.

The alternate means of monitoring the Reactor Building Area Radiation (High Range) consist of a combination of installed area radiation monitors and portable instrumentation.

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SURVEILLANCE  
REQUIREMENTS

As noted at the beginning of the SRs, the SRs apply to each PAM instrumentation Function in Table 3.3.8-1 except where indicated.

SR 3.3.8.1

Performance of the CHANNEL CHECK once every 31 days for each required instrumentation channel that is normally energized ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel with a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the two instrument channels could be an indication of excessive instrument drift in one of the channels or of something even more serious. CHANNEL CHECK will detect gross channel failure; therefore, it is key to verifying that the instrumentation continues to operate properly between each CHANNEL CALIBRATION. The high radiation instrumentation should be compared with similar unit instruments located throughout the unit. If the radiation monitor uses keep alive sources or check sources OPERABLE from the control room, the CHANNEL CHECK should also note the detector's response to these sources.

Agreement criteria are based on a combination of the channel instrument uncertainties, including indication and readability. If a channel is outside the criteria, it may be an indication that the sensor or the signal processing equipment has drifted outside its limit. If the channels are within the criteria, it is an indication that the channels

(continued)

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BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.3.8.1 (continued)

are OPERABLE. If the channels are normally off scale during times when surveillance is required, the CHANNEL CHECK will only verify that they are off scale in the same direction. Offscale low current loop channels are, where practical, verified to be reading at the bottom of the range and not failed downscale.

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

SR 3.3.8.2 and SR 3.3.8.3

A CHANNEL CALIBRATION is a complete check of the instrument channel, including the sensor. This test verifies the channel responds to measured parameters within the necessary range and accuracy.

Note 1 to SR 3.3.8.3 clarifies that the neutron detectors are not required to be tested as part of the CHANNEL CALIBRATION. There is no adjustment that can be made to the detectors. Furthermore, adjustment of the detectors is unnecessary because they are passive devices, with minimal drift. Slow changes in detector sensitivity are compensated for by performing the daily calorimetric calibration and the monthly axial channel calibration.

For the Containment Area Radiation instrumentation, a CHANNEL CALIBRATION may consist of an electronic calibration of the channel, not including the detector, for range decades above 10 R/hr, and a one point calibration check of the detector below 10 R/hr with a gamma source.

Whenever a sensing element is replaced, the next required CHANNEL CALIBRATION of the resistance temperature detectors (RTD)sensors or Core Exit thermocouple sensors is accomplished by an inplace cross calibration that compares the other sensing elements with the recently installed sensing element.

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BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.3.8.2 and SR 3.3.8.3 (continued)

SR 3.3.8.2 is modified by a Note indicating that it is applicable only to Functions 7, 10 and 22. SR 3.3.8.3 is modified by Note 2 indicating that it is not applicable to Functions 7, 10 and 22. The Frequency of each SR is based on operating experience and is justified by the assumption of the specified calibration interval in the determination of the magnitude of equipment drift.

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REFERENCES

1. Duke Power Company letter from Hal B. Tucker to Harold M. Denton (NRC) dated September 28, 1984.
  2. UFSAR, Section 7.5.
  3. NRC Letter from Helen N. Pastis to H. B. Tucker, "Emergency Response Capability - Conformance to Regulatory Guide 1.97," dated March 15, 1988.
  4. 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.
  5. NUREG-0737, "Clarification of TMI Action Plan Requirements," 1980.
  6. 10 CFR 50.36.
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BASES

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APPLICABLE  
SAFETY ANALYSES  
(continued)

available, the reactor coolant pumps continue to circulate coolant through the steam generators, maximizing the Reactor Coolant System (RCS) cooldown. With a loss of offsite power, the response of mitigating systems, such as the High Pressure Injection (HPI) System pumps, is delayed.

The TSVs remain open during power operation. These valves close upon a reactor trip.

- a. For an HELB or an MSLB inside containment, steam is discharged into containment from both steam generators until closure of the TSVs. After TSV closure, steam is discharged into containment only from the affected steam generator.
- b. An MSLB outside of containment and upstream from the TSVs is not a containment pressurization concern. The uncontrolled blowdown of both steam generators must be prevented to limit the potential for uncontrolled RCS cooldown and positive reactivity addition. Closure of the TSVs isolates the break and limits the blowdown to a single steam generator.
- c. An event such as increased steam flow through the turbine will terminate on closing the TSVs.
- d. Following a steam generator tube rupture, closure of the TSVs isolates the ruptured steam generator from the intact steam generator.

The TSV Closure function satisfies Criterion 3 of 10 CFR 50.36 (Ref. 2).

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LCO

Two TSV Closure channels are required to be OPERABLE.

This LCO provides assurance that the TSVs will perform their design safety function to mitigate the consequences of accidents that could result in offsite exposures comparable to the 10 CFR 100 limits (Ref. 3).

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(continued)

## B 3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

### B 3.5.4 Borated Water Storage Tank (BWST)

#### BASES

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##### BACKGROUND

The BWST supports the ECCS and the Reactor Building Spray System by providing a source of borated water for ECCS and reactor building spray pump operation. In addition, the BWST supplies borated water to the refueling canal for refueling operations.

A normally open, motor operated isolation valve is provided in each LPI line to allow the operator to isolate the BWST from the LPI System after the LPI pump suction has been transferred to the reactor building sump following depletion of the BWST during a loss of coolant accident (LOCA). Use of a single BWST to supply both ECCS trains is acceptable because the BWST is a passive component, and passive failures are not assumed to occur coincidentally with a LOCA.

This LCO ensures that:

- a. The BWST contains sufficient borated water to support the ECCS during the injection phase;
- b. Sufficient water volume exists in the reactor building sump to support continued operation of the ECCS and reactor building spray pumps at the time of transfer to the recirculation mode of cooling; and
- c. The reactor remains subcritical following a LOCA and returns subcritical following a MSLB once borated water from the ECCS reaches the core.

Insufficient water inventory in the BWST could result in insufficient cooling capacity by the ECCS when the transfer to the recirculation mode occurs.

Improper boron concentrations could result in a reduction of SDM or excessive boric acid precipitation in the core following a LOCA, as well as excessive caustic stress corrosion of mechanical components and systems inside containment.



BASES

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APPLICABLE  
SAFETY ANALYSES  
(continued)

return to power. With offsite power available, the reactor coolant pumps continue to circulate coolant through the steam generators, maximizing the Reactor Coolant System (RCS) cooldown. With a loss of offsite power, the response of mitigating systems, such as the High Pressure Injection (HPI) System pumps, is delayed.

The TSVs remain open during power operation. These valves close upon a reactor trip.

- a. For an HELB or an MSLB inside containment, steam is discharged into containment from both steam generators until closure of the TSVs. After TSV closure, steam is discharged into containment only from the affected steam generator.
- b. An MSLB outside of containment and upstream from the TSVs is not a containment pressurization concern. The uncontrolled blowdown of both steam generators must be prevented to limit the potential for uncontrolled RCS cooldown and positive reactivity addition. Closure of the TSVs isolates the break and limits the blowdown to a single steam generator.
- c. Steam flow to the turbine if not controlled by the turbine control valves will terminate on closing the TSVs.
- d. Following a steam generator tube rupture, closure of the TSVs isolates the ruptured steam generator from the intact steam generator.

The TSVs satisfy Criterion 3 of 10 CFR 50.36, (Ref. 3).

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LCO

This LCO requires that the two TSVs in each steam line be OPERABLE. The TSVs are considered OPERABLE when the isolation times are within limits and they close on an isolation actuation signal.

This LCO provides assurance that the TSVs will perform their design safety function to mitigate the consequences of accidents that could result in offsite exposures comparable to the 10 CFR 100 limits (Ref. 4).

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BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.9.2.1 (continued)

instrument may not be available for comparison. The CHANNEL CHECK provides verification that the OPERABLE source range channel is energized and indicates a value consistent with current unit status.

The Frequency of 12 hours is consistent with the CHANNEL CHECK Frequency specified similarly for the same instruments in LCO 3.3.9.

SR 3.9.2.2

SR 3.9.2.2 is the performance of a CHANNEL CALIBRATION every 18 months. This SR is modified by a Note stating that neutron detectors are excluded from the CHANNEL CALIBRATION. The CHANNEL CALIBRATION for the source range nuclear instrument is a complete check and re-adjustment of the channel, from the pre-amplifier input to the indicator. The 18 month Frequency is based on the need to perform this Surveillance during the conditions that apply during a unit outage. Industry experience has shown these components usually pass the Surveillance when performed at the 18 month Frequency.

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REFERENCES

1. UFSAR, Section 3.1.
  2. UFSAR, Section 15.4.
  3. 10 CFR 50.36.
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