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(continued)

3.3 INSTRUMENTATION

3.3.7.2 Mechanical Vacuum Pump Trip Instrumentation

LC0 3.3.7.2 Four channels of Main Steam Line Radiation—High Function for the mechanical vacuum pump trip shall be OPERABLE.

APPLICABILITY: MODES 1 and 2 with the mechanical vacuum pump in service and any main steam line not isolated.

ACTIONS

-----NOTE-----
Separate Condition entry is allowed for each channel.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more channels inoperable.	A.1 Restore channel to OPERABLE status.	12 hours
	<p><u>OR</u></p> <p>A.2 -----NOTE----- Not applicable if inoperable channel is the result of an inoperable mechanical vacuum pump breaker. -----</p> <p>Place channel in trip.</p>	
B. Mechanical vacuum pump trip capability not maintained.	B.1 Restore trip capability.	1 hour

(continued)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Required Action and associated Completion Time not met.	C.1 Isolate the associated mechanical vacuum pump.	12 hours
	<u>OR</u>	
	C.2 Remove the associated mechanical vacuum pump breaker from service.	12 hours
	<u>OR</u>	
	C.3 Isolate the main steam lines.	12 hours
	<u>OR</u>	
	C.4 Be in MODE 3.	12 hours

SURVEILLANCE REQUIREMENTS

-----NOTE-----

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 mechanical vacuum pump trip capability is maintained.

SURVEILLANCE		FREQUENCY
SR 3.3.7.2.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.7.2.2	Perform CHANNEL FUNCTIONAL TEST.	92 days
SR 3.3.7.2.3	-----NOTE----- Radiation detectors are excluded. ----- Perform CHANNEL CALIBRATION.	92 days
SR 3.3.7.2.4	Perform CHANNEL CALIBRATION. The Allowable Value shall be \leq 5900 mR/hr.	24 months
SR 3.3.7.2.5	Perform LOGIC SYSTEM FUNCTIONAL TEST including mechanical vacuum pump breaker actuation.	24 months

B 3.3 INSTRUMENTATION

B 3.3.7.2 Mechanical Vacuum Pump Trip Instrumentation

BASES

BACKGROUND

The Mechanical Vacuum Pump Trip Instrumentation initiates a trip of the main condenser mechanical vacuum pump breaker following events in which main steam line radiation exceeds predetermined values. Tripping the mechanical vacuum pump limits the offsite and control room doses in the event of a control rod drop accident (CRDA).

The Mechanical Vacuum Pump Trip Instrumentation (Ref. 1) includes detectors, monitors, and relays that are necessary to cause initiation of a mechanical vacuum pump trip. The channels include electronic equipment that compares measured input signals with pre-established setpoints. When the setpoint is exceeded, the channel output relay actuates, which then outputs an isolation signal to the mechanical vacuum pump trip logic.

The trip logic consists of two independent trip systems, with two channels of Main Steam Line Radiation-High in each trip system. Each trip system is a one-out-of-two logic for this Function. Thus, either channel of Main Steam Line Radiation-High in each trip system is needed to trip a trip system. The outputs of the channels in a trip system are combined in a one-out-of-two taken twice logic so that both trip systems must trip to result in a pump trip signal.

There is one mechanical vacuum pump breaker associated with this Function.

APPLICABLE
SAFETY ANALYSES

The Mechanical Vacuum Pump Trip Instrumentation is assumed in the safety analysis for the CRDA. The Mechanical Vacuum Pump Trip Instrumentation initiates a trip of the mechanical vacuum pump to limit offsite and control room doses resulting from fuel cladding failure in a CRDA (Ref. 2)

The mechanical vacuum pump trip instrumentation satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii).

(continued)

BASES (continued)

LCO

The OPERABILITY of the mechanical vacuum pump trip is dependent on the OPERABILITY of the individual Main Steam Line Radiation-High instrumentation channels, which must have a required number of OPERABLE channels in each trip system, with their setpoints within the specified Allowable Value of SR 3.3.7.2.4. The actual setpoint is calibrated consistent with applicable setpoint methodology assumptions. Channel OPERABILITY also includes the mechanical vacuum pump breaker.

An Allowable Value is specified for the Main Steam Line Radiation-High Trip Function specified in the LCO. The nominal trip setpoint is specified in the setpoint calculations. The nominal setpoint is selected to ensure that the setpoint does not exceed the Allowable Value between CHANNEL CALIBRATIONS. Operation with a trip setpoint less conservative than the nominal trip setpoint, but within its Allowable Value, is acceptable. A channel is inoperable if its actual trip setpoint is not within its required Allowable Value. The trip setpoint is that predetermined value of output at which an action should take place. The setpoint is compared to the actual process parameter (i.e., main steam line radiation) and when the measured output value of the process parameter exceeds the setpoint, the associated device (e.g., trip auxiliary unit) changes state. The analytic limit is derived from the limiting value of the process parameter obtained from the safety analysis. The trip setpoints are determined from the analytic limits, corrected for defined process, calibration, and instrument errors. The Allowable Values are then determined, based on the trip setpoint values, by accounting for the calibration based errors. These calibration based errors are limited to reference accuracy, instrument drift, errors associated with measurement and test equipment, and calibration tolerance of loop components. The trip setpoints and Allowable Values determined in this manner provide adequate protection because instrument uncertainties, process effects, calibration tolerances, instrument drift, and severe environment errors (for channels that must function in harsh environments as defined by 10 CFR 50.49) are accounted for and appropriately applied for the instrumentation.

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BASES (continued)

APPLICABILITY The mechanical vacuum pump trip is required to be OPERABLE in MODES 1 and 2, when any mechanical vacuum pump is in service (i.e., taking a suction on the main condenser) and any main steam line not isolated, to mitigate the consequences of a postulated CRDA. In this condition fission products released during a CRDA could be discharged directly to the environment. Therefore, the mechanical trip is necessary to assure conformance with the radiological evaluation of the CRDA. In MODE 3, 4 or 5 the consequences of a control rod drop are insignificant, and are not expected to result in any fuel damage or fission product releases. When the mechanical vacuum pump is not in service or the main steam lines are isolated, fission product releases via this pathway would not occur.

ACTIONS A Note has been provided to modify the ACTIONS related to Mechanical Vacuum Pump 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 Mechanical Vacuum Pump 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 Mechanical Vacuum Pump Trip Instrumentation channel.

A.1 and A.2

With one or more channels inoperable, but with mechanical vacuum pump trip capability maintained (refer to Required Action B.1 Bases), the Mechanical Vacuum Pump Trip Instrumentation is capable of performing the intended function. However, the reliability and redundancy of the Mechanical Vacuum Pump Trip Instrumentation is reduced, such that a single failure in one of the remaining channels could

(continued)

BASES

ACTIONS

A.1 and A.2 (continued)

result in the inability of the Mechanical Vacuum Pump Trip Instrumentation to perform the intended function. Therefore, only a limited time is allowed to restore the inoperable channels to OPERABLE status. Because of the low probability of extensive numbers of inoperabilities affecting multiple channels, and the low probability of an event requiring the initiation of mechanical vacuum pump trip, 12 hours has been shown to be acceptable (Ref. 3) to permit restoration of any inoperable channel to OPERABLE status (Required Action A.1). Alternately, the inoperable channel, may be placed in trip (Required Action A.2), since this would conservatively compensate for the inoperability, restore capability to accommodate a single failure, and allow operation to continue. As noted, placing the channel in trip with no further restrictions is not allowed if the inoperable channel is the result of an inoperable mechanical vacuum pump breaker, since this may not adequately compensate for the inoperable breaker. 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 loss of condenser vacuum), or if the inoperable channel is the result of an inoperable breaker, Condition C must be entered and its Required Actions taken.

B.1

Condition B is intended to ensure that appropriate actions are taken if multiple, inoperable, untripped channels within the same trip system result in not maintaining mechanical vacuum pump trip capability. The mechanical vacuum pump trip capability is maintained when sufficient channels are OPERABLE or in trip such that the Mechanical Vacuum Pump Trip Instrumentation will generate a trip signal from a valid Main Steam Line Radiation-High signal, and the mechanical vacuum pump breaker will open. This would require both trip systems to have one channel OPERABLE or in trip, and the mechanical vacuum pump breaker to be OPERABLE.

The Completion Time is intended to allow the operator time to evaluate and repair any discovered inoperabilities. The Completion Time is acceptable because it minimizes risk while allowing time for restoration or tripping of channels.

(continued)

BASES

ACTIONS
(continued)

C.1, C.2, C.3, and C.4

With any Required Action and associated Completion Time not met, the plant must be brought to a MODE or other specified condition in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours (Required Action C.4). Alternately, the associated mechanical vacuum pump may be removed from service since this performs the intended function of the instrumentation (Required Actions C.1 and C.2). An additional option is provided to isolate the main steam lines (Required Action C.3), which may allow operation to continue. Isolating the main steam lines effectively provides an equivalent level of protection by precluding fission product transport to the condenser.

The allowed Completion Time of 12 hours is reasonable, based on operating experience, to reach MODE 3 from full power conditions, or to remove the mechanical vacuum pump from service, or to isolate the main steam lines, 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 the associated Conditions and Required Actions may be delayed for up to 6 hours provided mechanical vacuum pump trip capability is maintained. Upon completion of the Surveillance, or expiration of the 6 hour allowance, the channel must be returned to OPERABLE status or the applicable Condition entered and Required Actions taken. This Note is based on the reliability analysis (Ref. 3) assumption of the average time required to perform channel Surveillance. That analysis demonstrated that the 6 hour testing allowance does not significantly reduce the probability that the mechanical vacuum pump will trip when necessary.

SR 3.3.7.2.1

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

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BASES

SURVEILLANCE
REQUIREMENTS

SR 3.3.7.2.1 (continued)

indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the instrument channels could be an indication of excessive instrument drift in one of the channels or something even more serious. A CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying the instrumentation continues to operate properly between each CHANNEL CALIBRATION.

Agreement criteria are determined by the plant staff based on a combination of the channel instrument uncertainties, including indication and readability. If a channel is outside the criteria, it may be an indication that the instrument has drifted outside its limit.

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

SR 3.3.7.2.2

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the 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 the reliability analysis of Reference 3.

SR 3.3.7.2.3 and SR 3.3.7.2.4

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

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BASES

SURVEILLANCE
REQUIREMENTS

SR 3.3.7.2.3 and SR 3.3.7.2.4 (continued)

range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations consistent with the plant specific setpoint methodology. A Note to SR 3.3.7.2.3 states that radiation detectors are excluded from CHANNEL CALIBRATION since they are calibrated in accordance with SR 3.3.7.2.4.

The Frequency of SR 3.3.7.2.3 is based upon the assumption of a 92 day calibration interval in the determination of the magnitude of equipment drift associated with the channel, except for the radiation detectors, in the setpoint analysis. The Frequency of SR 3.3.7.2.4 is based upon the assumption of a 24 month calibration interval in the determination of the magnitude of equipment drift for the radiation detector in the setpoint analysis.

SR 3.3.7.2.5

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required trip logic for a specific channel. The system functional test of the mechanical vacuum pump breaker 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 the breaker is incapable of operating, the associated instrument channel(s) would be inoperable.

The 24 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown these components usually pass the Surveillance when performed at the 24 month Frequency.

REFERENCES

1. UFSAR, Section 11.5.1.1.
 2. UFSAR, Section 15.4.10.
 3. NEDC-30851-P-A, "Supplement 2, "Technical Specifications Improvement Analysis for BWR Isolation Instrumentation Common to RPS and ECCS Instrumentation," March 1989.
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