

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.6.1.3.6	Verify the isolation time of each MSIV is ≥ 3 seconds and ≤ 5 seconds.	In accordance with the Inservice Testing Program
SR 3.6.1.3.7	Verify each automatic PCIV actuates to the isolation position on an actual or simulated isolation signal.	18 months
SR 3.6.1.3.8	Verify a representative sample of reactor instrumentation line EFCVs actuate to the isolation position on an actual or simulated instrument line break.	18 months
SR 3.6.1.3.9	Remove and test the explosive squib from each shear isolation valve of the TIP System.	18 months on a STAGGERED TEST BASIS
SR 3.6.1.3.10	Verify leakage rate through each MSIV is ≤ 11.5 scfh when tested at ≥ 29 psig.	In accordance with the Primary Containment Leakage Rate Testing Program

(continued)

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.6.1.3.6 (continued)

calculated radiological consequences of these events remain within 10 CFR 100 limits. The Frequency of this SR is in accordance with the requirements of the Inservice Testing Program.

SR 3.6.1.3.7

Automatic PCIVs close on a primary containment isolation signal to prevent leakage of radioactive material from primary containment following a DBA. This SR ensures that each automatic PCIV will actuate to its isolation position on a primary containment isolation signal. The LOGIC SYSTEM FUNCTIONAL TEST in LCO 3.3.6.1, "Primary Containment Isolation Instrumentation," overlaps this SR to provide complete testing of the safety function. The 18 month Frequency was developed considering it is prudent that this Surveillance be performed only during a unit outage since isolation of penetrations would disrupt the normal operation of many critical components. Operating experience has shown that these components usually pass this Surveillance when performed at the 18 month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

SR 3.6.1.3.8

This SR requires a demonstration that a representative sample of reactor instrumentation line excess flow check valves (EFCVs) are OPERABLE by verifying that each valve actuates to the isolation position on an actual or simulated instrument line break. The representative sample consists of an approximately equal number of EFCVs, such that each EFCV is tested at least once every 10 years (nominal). This SR provides assurance that the instrumentation line EFCVs will perform so that predicted radiological consequences will not be exceeded during the postulated instrument line break event. The 18 month Frequency is based on the need to perform the 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.

The nominal 10 year interval is based on other performance-based testing programs, such as Inservice Testing (snubbers) and Option B to 10 CFR 50, Appendix J. Furthermore, any EFCV failures will be evaluated to determine if additional testing in that test interval is warranted to ensure overall reliability is maintained. Operating experience has demonstrated that these components are highly reliable and that failures to isolate are very infrequent. Therefore, testing of a representative sample was concluded to be acceptable from a reliability standpoint.