

July 15, 1998

Mr. J. S. Keenan, Vice President  
Carolina Power & Light Company  
Brunswick Steam Electric Plant  
Post Office Box 10429  
Southport, North Carolina 28461

SUBJECT: CORRECTION OF PAGE REPRODUCTION ERRORS ASSOCIATED WITH  
AMENDMENT NO. 203 TO FACILITY OPERATING LICENSE NO. DPR-71  
AND AMENDMENT NO. 233 TO FACILITY OPERATING LICENSE NO. DPR-  
62 - BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2 (TAC NOS.  
M97243 AND M97244)

Dear Mr. Keenan:

On June 5, 1998, the NRC issued Amendment No. 203 to the facility operating license DPR-71 and Amendment No. 233 to the facility operating license DPR-62 for the Brunswick Steam Electric Plant, Units 1 and 2 (BSEP 1 & 2), approving the conversion from the current Technical Specifications (TS) to the improved TS, as contained in Revision 1 of NUREG-1433, "Standard Technical Specifications General Electric Plants, BWR/4." Subsequently, the NRC staff and Carolina Power & Light Co. have determined that, due to errors in the reproduction process, several copies of the amendments were missing pages. Additionally an overprint error was identified on one of the Unit 1 TS Bases pages and a duplicate TS Bases page was issued for BSEP 2.

The enclosed BSEP 1 & 2 improved TS pages are hereby issued to correct the above administrative errors.

Sincerely,

Original signed by

David C. Trimble, Project Manager  
Project Directorate II-1  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Docket Nos. 50-325  
and 50-324

Enclosures:

1. Administrative Corrections to Safety Evaluation
2. Administrative Corrections to Amendment No. 203 to License No. DPR-71
3. Administrative Corrections to Amendment No. 233 to License No. DPR-62

cc w/enclosure: See next page

Distribution: See next page

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11/15

ADMINISTRATIVE CORRECTIONS TO SAFETY EVALUATION

Where missing, insert the following pages into the Safety Evaluation and associated Table RL for Amendment No. 203 to Facility Operating License No. DPR-71 and Amendment No. 233 To Facility Operating License No. DPR-62.

Remove Pages

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Insert Pages

page 42 (Safety Evaluation)  
page 9 of 51 (Table RL)

The portions of the LCO and SRs applicable to the ADS inhibit switch do not meet the criteria in 10 CFR 50.36. Therefore, in accordance with the NRC Final Policy Statement, these specifications are relocated out of the ITS. Any changes to these former requirements regarding the instrumentation, as relocated to the TRM, will require a safety evaluation pursuant to 10 CFR 50.59. Thus, sufficient regulatory controls exist to ensure continued protection of public health and safety.

#### CTS TABLE 3/4.3.2 ISOLATION ACTUATION INSTRUMENTATION

The isolation actuation instrumentation consisting of the HPCI bus power monitor and the RCIC bus power monitor is relocated to the TRM. The isolation actuation instrumentation channels shown in Table 3.3.2-1 is required to be Operable with their trip setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.3.2-2.

##### 3/4.3.2.4.a.5 HPCI Bus Power Monitor

##### 3/4.3.2.4.b.5 RCIC Bus Power Monitor

The bus power monitors for HPCI and RCIC trip systems alarm if a fault is detected in the power system to the appropriate system's logic. No DBA or transient analyses take credit for the bus power monitors. This instrumentation provides a monitoring/alarm function only.

The isolation actuation instrumentation LCO and SRs associated with the HPCI and RCIC bus power monitors do not meet the criteria in 10 CFR 50.36. Therefore, in accordance with the NRC Final Policy Statement, these specifications are relocated out of the ITS. Any changes to these former requirements regarding the isolation actuation instrumentation, as relocated to the TRM, will require a safety evaluation pursuant to 10 CFR 50.59. Thus, sufficient regulatory controls exist to ensure continued protection of public health and safety.

#### CTS 3/4.3.5.5 CONTROL ROOM EMERGENCY VENTILATION SYSTEM

The control room emergency ventilation system instrumentation for chlorine isolation and control room envelop smoke protection is relocated to the TRM. This instrumentation, shown in Table 3.3.5.5-1, is required to be Operable.

##### 3/4.3.5.5.1 Chlorine Isolation

The control room emergency ventilation chlorine isolation instrumentation functions to permit continuous occupancy of the control room emergency zone during a toxic gas event. In the event of a chlorine release, the control room heating, ventilation and air conditioning (CBHVAC) system enters a full recirculation mode, with no outdoor air intake. However, the

TABLE RL - RELOCATED DETAILS MATRIX (page 9 of 51)

Discussion of Change	CTS Section	Description	General Location	Change Controls	Characterization	Change Type
ITS 3.3.1.1 - RPS INSTRUMENTATION						
3.3.1.1 LA.1	Table 2.2.1-1	Trip setpoints for associated instrumentation.	TRM	10 CFR 50.59	Relocation of operational details not required for Operability	2
3.3.1.1 LA.2	Table 2.2.1-1 Notes (a), (c), and (d)	Design details of RPS instrumentation.	Bases	Bases Control Program (5.5.10)	Relocation of system design description details	1
3.3.1.1 LA.3	Table 2.2.1-1 Note (b), (e) and (f)	Note (b): APRM Neutron Flux - High, Startup Function is a fixed point and is increased when the reactor mode switch is placed in run position. Note (e): Main Steam Line Isolation Valve - Closure Function is bypassed when not in the run mode. Note (f): TSV - Closure and TCV Fast Closure Functions are bypassed < 30% rated thermal power.	UFSAR	10 CFR 50.59	Relocation of system design description details	1
3.3.1.1 LA.4	Table 2.2.1-1 Note (g)	Vessel water levels are referenced to REFERENCE LEVEL ZERO.	Bases	Bases Control Program (5.5.10)	Relocation of descriptive information	1

Types of Changes

Type 1 - Details of System Design and System Description Including Design Limits

Type 2 - Descriptions of Systems or Plant Operation

Type 3 - Procedural Details for Meeting TS Requirements & Related Reporting Requirements

Type 4 - Performance Requirements for Indication-only Instrumentation and Alarms

Brunswick Unit Nos. 1 and 2

ADMINISTRATIVE CORRECTIONS TO LICENSE AMENDMENT NO. 203

FACILITY OPERATING LICENSE NO. DPR-71

DOCKET NO. 50-325

For all copies of the Brunswick Unit 1 Technical Specifications (TS) Bases, replace the following page. The revised areas are indicated by a marginal line.

Remove Page

B3.1-24

Insert Page

B3.1-24

Where missing from copies of the Brunswick Unit 1 TS Bases, add the following pages.

Remove Pages

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Insert Pages

B3.2-11  
B3.2-14  
B3.3-19  
B3.3-26  
B3.3-36  
B3.3-42  
B3.3-64  
B3.3-89  
B3.3-97  
B3.3-99  
B3.3-101  
B3.3-109  
B3.3-111

BASES (continued)

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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  $\geq 800$  psig demonstrates acceptable scram times for the transients analyzed in Reference 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  $\geq 800$  psig ensures that the measured scram times will be within the specified limits at higher pressures. This test is performed for each control rod from its fully withdrawn position. Limits are specified as a function of reactor pressure to account for the sensitivity of the scram insertion times with pressure and to allow a range of pressures over which scram time testing can be performed. To ensure that scram time testing is performed within a reasonable time following fuel movement within the reactor pressure vessel or following a shutdown  $\geq 120$  days, all control rods are required to be tested before exceeding 40% RTP following the shutdown. The specified Frequencies are 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.

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B 3.2 POWER DISTRIBUTION LIMITS

B 3.2.3 Fraction of Core Boiling Boundary (FCBB)

BASES

BACKGROUND

General Design Criteria 12 requires protection of fuel thermal safety limits from conditions caused by neutronic/thermal hydraulic instability. Neutronic/thermal hydraulic instabilities result in power oscillations which could result in exceeding the MCPR Safety Limit (SL). The MCPR SL is set such that 99.9% of the fuel rods avoid boiling transition during normal operation and during an anticipated operational occurrence (AOO) (refer to the Bases for SL 2.1.1.2).

The FCBB is the ratio of the power generated in the lower 4 feet of the active reactor core to the power required to produce bulk saturated boiling of the coolant entering the fuel channels. The value of 4 feet above the bottom of the active fuel is set as the boiling boundary limit based on analysis described in Section 9 of Reference 1. The boiling boundary limit is established to ensure that the core will remain stable during normal reactor operations in the Restricted Region of the power and flow map defined in the COLR which may otherwise be susceptible to neutronic/thermal hydraulic instabilities.

Planned operation in the Restricted Region is accommodated by manually establishing the "Setup" Allowable Values for the APRM Flow-Biased Simulated Thermal Power—High scram and control rod block functions. The "Setup" Allowable Values of the APRM Flow-Biased Thermal Power—High Function (refer to LCO 3.3.1.1, Table 3.3.1.1-1, Function 2.b.) are consistent with assumed operation in the Restricted Region with  $FCBB \leq 1.0$ . Operation with the "Setup" values enables entry into the Restricted Region without a control rod block that would otherwise occur. Plant operation with the "Setup" values is limited as much as practical due to the effects on plant operation required to meet the FCBB limit.

APPLICABLE  
SAFETY ANALYSES

The analytical methods and assumptions used in establishing the boiling boundary limit are presented in Section 9 of Reference 1. Operation with the  $FCBB \leq 1.0$  (i.e., a bulk saturated boiling boundary  $\geq 4$  feet) is expected to ensure that operation within the Restricted Region will not result

(continued)

## BASES

## ACTIONS

A.1 (continued)

to restore the FCBB to within the limit such that the stability of the core can be assured. Following uncontrolled entry into the Restricted Region, prompt restoration of FCBB within limit can be expected if FCBB is known to not significantly exceed the limit. Therefore, efforts to restore FCBB within limit following an uncontrolled entry into the Restricted Region are appropriate if operation prior to entry was consistent with planned entry or the potential for entry was recognized as demonstrated by FCBB being monitored and known to not significantly exceed the limit. Actions to exit the Restricted Region are appropriate when FCBB can not be expected to be restored in a prompt manner.

Actions to restart an idle recirculation loop, withdraw control rods or reduce recirculation flow may result in approaching unstable reactor conditions and are not allowed to be used to comply with this Required Action. The 2 hour Completion Time is based on engineering judgement as to a reasonable time to restore the FCBB to within limit. The 2 hour Completion Time is acceptable based on the availability of the PBDS per Specification 3.3.1.3, "Period Based Detection System" and the low probability of a neutronic/thermal hydraulic instability event.

B.1 and B.2

Changes in reactor core state conditions resulting from an unexpected loss of feedwater heating or unexpected reduction in core flow (e.g., any unexpected reduction in feedwater temperature, recirculation pump trip, or recirculation pump run back) require immediate initiation of action to exit the Restricted Region and return the APRM Flow Biased Simulated Thermal Power—High Function (refer to LCO 3.3.1.1, Table 3.3.1.1-1, Function 2.b.) to the "non-Setup" value. Condition B is modified by a Note that specifies that Required Actions B.1 and B.2 must be completed if this Condition is entered due to an unexpected loss of feedwater heating or unexpected reduction in core flow. The completion of Required Actions B.1 and B.2 is required even though FCBB may be calculated and determined to be within limit. Core conditions continue to change after an unexpected loss of feedwater heating or unexpected reduction in core flow due to transient induced changes with the

(continued)

BASES

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APPLICABLE  
SAFETY ANALYSES,  
LCO, and  
APPLICABILITY

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

Functions for any of the design basis accidents or transients analyzed in the UFSAR. However, they are retained to ensure the RPS remains OPERABLE.

SDV water level is measured by two diverse methods. The level in each of the two SDVs is measured by two float type level switches and two thermal probes for a total of eight level signals. The outputs of these devices are arranged so that there is a signal from a level switch and a thermal probe to each RPS logic channel. The level measurement instrumentation satisfies the recommendations of Reference 10.

The Allowable Value is chosen low enough to ensure that there is sufficient volume in the SDV to accommodate the water from a full scram.

Four channels of the Scram Discharge Volume Water Level—High Function, with at least one channel utilizing a float type switch and one channel utilizing a thermal probe in each trip system, are required to be OPERABLE to ensure that no single instrument failure will preclude a scram from these Functions on a valid signal. These Functions are required in MODES 1 and 2, and in MODE 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies, since these are the MODES and other specified conditions when control rods are withdrawn. At all other times, this Function may be bypassed.

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 2. For this event, the reactor scram reduces the amount of energy required to be absorbed and ensures that the MCPR SL is not exceeded.

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BASES

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ACTIONS  
(continued)

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.

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.

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(continued)

BASES

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REFERENCES  
(continued)

4. NEDC-32466P, Power Uprate Safety Analysis Report for Brunswick Steam Electric Plant Units 1 and 2, September 1995.
  5. 10 CFR 50.36(c)(2)(ii).
  6. NEDO-23842, Continuous Control Rod Withdrawal in the Startup Range, April 18, 1978.
  7. UFSAR, Section 5.2.2.
  8. UFSAR, Appendix 5.2A.
  9. UFSAR, Section 6.3.1.
  10. P. Check (NRC) letter to G. Lainas (NRC), BWR Scram Discharge System Safety Evaluation, December 1, 1980.
  11. NEDC-30851-P-A, Technical Specification Improvement Analyses for BWR Reactor Protection System, March 1988.
  12. MDE-81-0485, Technical Specification Improvement Analysis for the Reactor Protection System for Brunswick Steam Electric Plant, Units 1 and 2, April 1985.
  13. UFSAR, Table 7.2.1-3.
  14. NEDO-32291-A, System Analyses for the Elimination of Selected Response Time Testing Requirements, October 1995.
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BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.3.1.2.1 and SR 3.3.1.2.3 (continued)

The Frequency of once every 12 hours for SR 3.3.1.2.1 is based on operating experience that demonstrates channel failure is rare. While in MODES 3 and 4, reactivity changes are not expected; therefore, the 12 hour Frequency is relaxed to 24 hours for SR 3.3.1.2.3. The CHANNEL CHECK supplements less formal, but more frequent, checks of channels during normal operational use of the displays associated with the channels required by the LCO.

SR 3.3.1.2.2

To provide adequate coverage of potential reactivity changes in the core, one SRM is required to be OPERABLE in the quadrant where CORE ALTERATIONS are being performed, and the other OPERABLE SRM must be in an adjacent quadrant containing fuel. Note 1 states that the SR is required to be met only during CORE ALTERATIONS. It is not required to be met at other times in MODE 5 since core reactivity changes are not occurring. This Surveillance consists of a review of plant logs to ensure that SRMs required to be OPERABLE for given CORE ALTERATIONS are, in fact, OPERABLE. Note 2 clarifies that more than one of the three requirements can be met by the same OPERABLE SRM. The 12 hour Frequency is based upon operating experience and supplements operational controls over refueling activities that include steps to ensure that the SRMs required by the LCO are in the proper quadrant.

SR 3.3.1.2.4

This Surveillance consists of a verification of the SRM instrument readout to ensure that the SRM reading is greater than a specified minimum count rate with the detector inserted to the normal operating level, which ensures that the detectors are indicating count rates indicative of neutron flux levels within the core. With few fuel assemblies loaded, the SRMs will not have a high enough count rate to satisfy the SR. Therefore, allowances are made for loading sufficient "source" material, in the form of irradiated fuel assemblies, to establish the minimum count rate.

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BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.3.2.1.4 (continued)

verified periodically to be less than or equal to the specified Allowable Values in the COLR. If any power range setpoint is nonconservative, then the affected RBM channel is considered inoperable. Alternatively, the RBM power range 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 3.3.1.1.3 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

The RWM is automatically bypassed when power is above a specified value. The power level is determined from 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 3.3.2.1.6

A CHANNEL FUNCTIONAL TEST is performed for the Reactor Mode Switch—Shutdown Position Function to ensure that the 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

(continued)

BASES

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ACTIONS  
(continued)

B.1

If the Required Action and associated Completion Time of Condition A are 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 is reasonable, based on operating experience, to reach the required MODE from full power conditions in an orderly manner and without challenging plant systems.

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SURVEILLANCE  
REQUIREMENTS

SR 3.3.3.2.1

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 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 sensor or the signal processing equipment has drifted outside its limit. As specified in the Surveillance, a CHANNEL CHECK is only required for those channels that are normally energized. For Function 2 of Table B 3.3.3.2-1, the CHANNEL CHECK requirement does not apply to the N017 instrument loop since this instrument loop has no displayed indication. The CHANNEL CHECK requirement does apply to the remaining instruments of Function 2.

The Frequency is based upon plant operating experience that demonstrates channel failure is rare.

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BASES

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ACTIONS  
(continued)

B.1

Required Action B.1 is intended to ensure that appropriate actions are taken if multiple, inoperable, untripped channels within the same Function result in the Function not maintaining ATWS-RPT trip capability. A Function is considered to be maintaining ATWS-RPT trip capability when sufficient channels are OPERABLE or in trip such that the ATWS-RPT System will generate a trip signal from the given Function on a valid signal, and both recirculation pumps can be tripped. This requires two channels of the Function in the same trip system to each be OPERABLE or in trip, and the recirculation pump drive motor breakers to be OPERABLE or in trip.

The 72 hour Completion Time is sufficient for the operator to take corrective action (e.g., restoration or tripping of channels) and takes into account the likelihood of an event requiring actuation of the ATWS-RPT instrumentation during this period and that one Function is still maintaining ATWS-RPT trip capability.

C.1

Required Action C.1 is intended to ensure that appropriate Actions are taken if multiple, inoperable, untripped channels within both Functions result in both Functions not maintaining ATWS-RPT trip capability. The description of a Function maintaining ATWS-RPT trip capability is discussed in the Bases for Required Action B.1 above.

The 1 hour Completion Time is sufficient for the operator to take corrective action and takes into account the likelihood of an event requiring actuation of the ATWS-RPT instrumentation during this period.

D.1 and D.2

With any Required Action and associated Completion Time not met, the plant must be brought to a MODE or other specified condition in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 2 within 6 hours (Required Action D.2). Alternately, the associated recirculation pump(s) may be removed from service since this

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BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.3.4.1.1 (continued)

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 3.3.4.1.2

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 3.3.4.1.3

Calibration of trip units provides a check of the actual trip setpoints. The channel must be declared inoperable if the trip setting is discovered to be less conservative than the Allowable Value specified in SR 3.3.4.1.4. If the trip setting is discovered to be less conservative than the setting accounted for in the appropriate setpoint methodology, but is not beyond the Allowable Value, the channel performance is still within the requirements of the plant design analysis. Under these conditions, the setpoint must be readjusted to be equal to or more conservative than accounted for in the appropriate setpoint methodology.

The Frequency of 92 days is based on the reliability analysis of Reference 3.

SR 3.3.4.1.4

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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## B 3.3 INSTRUMENTATION

### B 3.3.5.1 Emergency Core Cooling System (ECCS) Instrumentation

#### BASES

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##### BACKGROUND

The purpose of the ECCS instrumentation is to initiate appropriate responses from the systems to ensure that the fuel is adequately cooled in the event of a design basis accident or transient.

For most anticipated operational occurrences and Design Basis Accidents (DBAs), a wide range of dependent and independent parameters are monitored.

The ECCS instrumentation actuates core spray (CS), the low pressure coolant injection (LPCI) mode of the Residual Heat Removal (RHR) System, high pressure coolant injection (HPCI), Automatic Depressurization System (ADS), and the diesel generators (DGs). The equipment involved with each of these systems is described in the Bases for LCO 3.5.1, "ECCS—Operating" or LCO 3.8.1, "AC Sources—Operating."

##### Core Spray System

The CS System may be initiated by either automatic or manual means. Automatic initiation occurs for conditions of Reactor Vessel Water Level—Low Level 3 or Drywell Pressure—High coincident with Reactor Steam Dome Pressure—Low. Each of these diverse variables is monitored by four redundant transmitters, which are, in turn, connected to four trip units. The outputs of the trip units are connected to relays whose contacts are arranged in a one-out-of-two taken twice logic (i.e., two trip systems) for each Function.

The CS System initiation signal is a sealed in signal and must be manually reset. The CS System can be reset if reactor water level and high drywell pressure have been restored. Upon receipt of an initiation signal, the CS pumps are started approximately 15 seconds after power is available to limit the loading of the AC power sources.

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BASES

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APPLICABLE  
SAFETY ANALYSES,  
LCO, and  
APPLICABILITY

1.b, 2.b. Drywell Pressure—High (continued)

ECCS and associated DGs are initiated upon receipt of the Drywell Pressure—High Function coincident with Reactor Steam Dome Pressure—Low Function in order to minimize the possibility of fuel damage. The Drywell Pressure—High Function is directly assumed in the analysis of the recirculation line break (Ref. 5). The core cooling function of the ECCS, along with the scram action of the RPS, ensures that the fuel peak cladding temperature remains below the limits of 10 CFR 50.46.

High drywell pressure signals are initiated from four pressure transmitters that sense drywell pressure. The Allowable Value was selected to be as low as possible to be indicative of a LOCA inside primary containment.

The Drywell Pressure—High Function is required to be OPERABLE when the ECCS or DG is required to be OPERABLE in conjunction with times when the primary containment is required to be OPERABLE. Thus, four channels of the CS and LPCI Drywell Pressure—High Functions are required to be OPERABLE in MODES 1, 2, and 3 to ensure that no single instrument failure can preclude ECCS and DG initiation. In MODES 4 and 5, the Drywell Pressure—High Function is not required, since there is insufficient energy in the reactor to pressurize the primary containment to Drywell Pressure—High setpoint. Refer to LCO 3.5.1 for Applicability Bases for the low pressure ECCS subsystems and to LCO 3.8.1 for Applicability Bases for the DGs.

1.c, 2.c. Reactor Steam Dome Pressure—Low

Low reactor steam dome pressure signals are used as permissives for the low pressure ECCS subsystems. This ensures that, prior to opening the injection valves of the low pressure ECCS subsystems, the reactor pressure has fallen to a value below these subsystems' maximum design pressure. The low reactor steam dome pressure signals are also used in the Drywell Pressure—High logic circuits to distinguish high drywell pressure caused by a LOCA from that caused by loss of drywell cooling. The Reactor Steam Dome Pressure—Low is one of the Functions assumed to be OPERABLE and capable of permitting initiation of the ECCS and associated DGs during the transients analyzed in References 2 and 3. In addition, the Reactor Steam Dome

(continued)

BASES

APPLICABLE  
SAFETY ANALYSES  
LCO, and  
APPLICABILITY

1.d, 2.f. Core Spray and RHR Pump Start—Time Delay Relays  
(continued)

pump start logic circuits. Each channel consists of an individual 10 second timer and a 5 second timer. The 5 second timer is common to both channels associated with a CS pump start logic circuit. Each 10 second timer associated with a CS pump start logic channel is shared with an RHR pump start logic channel.

While two time delay relay channels are dedicated to a single CS pump start logic, a single failure of a 5 second CS pump timer could result in the failure of the two low pressure ECCS pumps, powered from the same 4.16 kV emergency bus, to perform their intended function within the assumed ECCS RESPONSE TIME (e.g., as in the case where both ECCS pumps on one 4.16 kV emergency bus start simultaneously due to an inoperable time delay relay). This still leaves four of the six low pressure ECCS pumps OPERABLE. Additionally, a failure of both shared time delay relay channels in an RHR and CS pump start logic circuit would also leave four of the six low pressure ECCS pumps OPERABLE as described above. As a result, to satisfy the single failure criterion (i.e., loss of one instrument does not preclude ECCS initiation), only one channel per pump of the Core Spray and RHR Pump Start—Time Delay Relay Functions are required to be OPERABLE when the associated ECCS subsystem is required to be OPERABLE. Refer to LCO 3.5.1 and LCO 3.5.2 for Applicability Bases for the ECCS subsystems.

The Allowable Values for the Core Spray and RHR Pump Start—Time Delay Relays are chosen to be long enough so that most of the starting transient of the previously started pump is complete before starting a subsequent pump on the same 4.16 kV emergency bus and short enough so that ECCS operation is not degraded.

2.d. Reactor Steam Dome Pressure—Low (Recirculation Pump Discharge Valve Permissive)

Low reactor steam dome pressure signals are used as permissives for recirculation pump discharge valve closure and recirculation pump discharge bypass valve closure. This ensures that the LPCI subsystems inject into the proper RPV location assumed in the safety analysis. The Reactor Steam

(continued)

ADMINISTRATIVE CORRECTIONS TO LICENSE AMENDMENT NO. 233

FACILITY OPERATING LICENSE NO. DPR-62

DOCKET NO. 50-324

Where missing from copies of the Brunswick Unit 2 Technical Specifications (TS) and TS Bases, add the following pages.

Remove Pages

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- Extra page B3.3-129 placed after B3.3-70
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Insert Pages

- 3.3-67
- 3.3-72
- 3.4-2
- 3.7-18
- 3.7-21
- B3.3-71
- B3.3-76
- 
- B3.3-130
- B3.3-131
- B3.3-132
- B3.3-133
- B3.3-134
- B3.5-24
- B3.10-4 through B3.10-30

Condenser Vacuum Pump Isolation Instrumentation  
3.3.7.2

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
SR 3.3.7.2.4 Perform LOGIC SYSTEM FUNCTIONAL TEST including condenser vacuum pump trip breaker and isolation valve actuation.	24 months

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action and associated Completion Time of Condition A or B not met in MODE 3, 4, or 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies.	D.1 Initiate action to fully insert all insertable control rods in core cells containing one or more fuel assemblies.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.3.8.2.1 -----NOTE----- Only required to be performed prior to entering MODE 2 from MODE 3 or 4, when in MODE 4 for $\geq 24$ hours. ----- Perform CHANNEL FUNCTIONAL TEST.	184 days
SR 3.3.8.2.2 Perform CHANNEL CALIBRATION for each RPS motor generator set electric power monitoring assembly. The Allowable Values shall be:  a. Overvoltage $\leq 129$ V. b. Undervoltage $\geq 105$ V. c. Underfrequency $\geq 57.2$ Hz.	24 months

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. Required Action and associated Completion Time of Condition A not met.  <u>OR</u>  No recirculation loops in operation.	B.1 Be in MODE 3.	12 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.4.1.1 -----NOTE----- Not required to be performed until 24 hours after both recirculation loops are in operation. ----- Verify the following recirculation pump speed match criteria are satisfied: a. The recirculation pump speeds are $\leq 20\%$ of each other when operating at $< 75\%$ of rated core flow; and b. The recirculation pump speeds are $\leq 10\%$ of each other when operating at $\geq 75\%$ of rated core flow.	24 hours

3.7 PLANT SYSTEMS

3.7.5 Main Condenser Offgas

LCO 3.7.5 The gross gamma activity rate of the noble gases measured at the main condenser air ejector shall be  $\leq 243,600 \mu\text{Ci/second}$  after decay of 30 minutes.

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

ACTIONS

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

**SURVEILLANCE REQUIREMENTS**

SURVEILLANCE		FREQUENCY
SR 3.7.6.1	Verify one complete cycle of each main turbine bypass valve.	31 days
SR 3.7.6.2	Perform a system functional test.	24 months
SR 3.7.6.3	Verify the TURBINE BYPASS SYSTEM RESPONSE TIME is within limits.	24 months

BASES

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ACTIONS

B.1 (continued)

during this period. It is also consistent with the 4 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 the required channels not restored to OPERABLE status or placed in trip, THERMAL POWER must be reduced to < 25% RTP within 4 hours. As discussed in the Applicability section of the Bases, operation below 25% RTP results in sufficient margin to the required limits, and the feedwater 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.

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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. 3) assumption that 6 hours is 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 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

(continued)

BASES

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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 Vessel Pressure

Reactor vessel pressure is a Type A and Category I variable provided to support monitoring of Reactor Coolant System (RCS) integrity and to verify operation of the Emergency Core Cooling Systems (ECCS). Two independent pressure transmitters with a range of 0 psig to 1500 psig monitor pressure and are indicated in the control room. Wide range instruments are the primary indication used by the operator during an accident. Therefore, the PAM Specification deals specifically with this portion of the instrument channel.

2.a., 2.b., 2.c. Reactor Vessel Water Level

Reactor vessel water level is a Type A and Category I variable provided to support monitoring of core cooling and to verify operation of the ECCS. Channels from three different ranges of water level provide the PAM Reactor Vessel Water Level Function. The water level channels measure from -150 inches to +550 inches. Water level is measured by independent differential pressure transmitters for each required channel. The output from these channels is recorded on independent recorders or read on indicators, which are the primary indication used by the operator during an accident. Therefore, the PAM Specification deals specifically with this portion of the instrument channel.

3. Suppression Chamber Water Level

Suppression chamber water level is a Type A and Category I variable provided to detect a breach in the reactor coolant pressure boundary (RCPB). This variable is also used to verify and provide long term surveillance of ECCS function. The wide range suppression pool water level measurement provides the operator with sufficient information to assess the status of both the RCPB and the water supply to the ECCS. The wide range water level indicators are capable of monitoring the suppression pool water level from the bottom

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(continued)

BASES

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ACTIONS  
(continued)

Condition. However, the Required Actions for each requirement of the LCO not met provide appropriate compensatory measures for separate requirements that are not met. As such, a Note has been provided that allows separate Condition entry for each requirement of the LCO.

A.1

If a MODE 3 LCO specified in LCO 3.10.1 is not met, the ACTIONS applicable to the affected LCO are entered immediately and complied with. Required Action A.1 has been modified by a Note that clarifies the intent of another LCO's Required Action to be in MODE 4 includes reducing the average reactor coolant temperature to  $\leq 212^{\circ}\text{F}$ .

A.2.1 and A.2.2

Required Action A.2.1 and Required Action A.2.2 are alternate Required Actions that can be taken instead of Required Action A.1 to restore compliance with the normal MODE 4 requirements, and thereby exit this Special Operation LCO's Applicability. Activities that could further increase reactor coolant temperature or pressure are suspended immediately, in accordance with Required Action A.2.1, and the reactor coolant temperature is reduced to establish normal MODE 4 requirements. The allowed Completion Time of 24 hours for Required Action A.2.2 is based on engineering judgment and provides sufficient time to reduce the average reactor coolant temperature from the highest expected value to  $\leq 212^{\circ}\text{F}$  with normal cooldown procedures. The Completion Time is also consistent with the time provided in LCO 3.0.3 to reach MODE 4 from MODE 3.

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SURVEILLANCE  
REQUIREMENTS

SR 3.10.1.1

The LCOs made applicable are required to have their Surveillances met to establish that this LCO is being met. A discussion of the applicable SRs is provided in their respective Bases.

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(continued)

BASES (continued)

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- REFERENCES
1. American Society of Mechanical Engineers, Boiler and Pressure Vessel Code, Section XI.
  2. UFSAR, Section 15.6.3.
  3. NEDC-32466P, Power Uprate Safety Analysis Report for Brunswick Steam Electric Plant Units 1 and 2, September 1995.
  4. 10 CFR 50.36(c)(2)(ii).
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## B 3.10 SPECIAL OPERATIONS

### B 3.10.2 Reactor Mode Switch Interlock Testing

#### BASES

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#### BACKGROUND

The purpose of this Special Operations LCO is to permit operation of the reactor mode switch from one position to another to confirm certain aspects of associated interlocks during periodic tests and calibrations in MODES 3, 4, and 5.

The reactor mode switch is a conveniently located, multiposition, keylock switch provided to select the necessary scram functions for various plant conditions (Ref. 1). The reactor mode switch selects the appropriate trip relays for scram functions and provides appropriate bypasses. The mode switch positions and related scram interlock functions are summarized as follows:

- a. Shutdown—Initiates a reactor scram; bypasses main steam line isolation scram;
- b. Refuel—Selects Neutron Monitoring System (NMS) scram function for low neutron flux level operation (but does not disable the average power range monitor scram); bypasses main steam line isolation scram;
- c. Startup/Hot Standby—Selects NMS scram function for low neutron flux level operation (intermediate range monitors and average power range monitors); bypasses main steam line isolation scram; and
- d. Run—Selects NMS scram function for power range operation.

The reactor mode switch also provides interlocks for such functions as control rod blocks, scram discharge volume trip bypass, refueling interlocks, and main steam isolation valve isolations.

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#### APPLICABLE SAFETY ANALYSES

The acceptance criterion for reactor mode switch interlock testing is to prevent fuel failure by precluding reactivity excursions or core criticality. The interlock functions of the shutdown and refuel positions normally maintained for the reactor mode switch in MODES 3, 4, and 5 are provided to preclude reactivity excursions that could potentially result in fuel failure. Interlock testing that requires moving the

(continued)

BASES

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APPLICABLE  
SAFETY ANALYSES  
(continued)

reactor mode switch to other positions (run, startup/hot standby, or refuel) while in MODE 3, 4, or 5, requires administratively maintaining all control rods inserted and no CORE ALTERATIONS in progress. With all control rods inserted in core cells containing one or more fuel assemblies, and no CORE ALTERATIONS in progress, there are no credible mechanisms for unacceptable reactivity excursions during the planned interlock testing.

For postulated accidents, such as control rod removal error during refueling or loading of fuel with a control rod withdrawn, the accident analysis demonstrates that fuel failure will not occur (Refs. 2 and 3). The withdrawal of the single most reactive control rod will not result in criticality when adequate SDM is maintained. Also, loading fuel assemblies into the core with a single control rod withdrawn will not result in criticality, thereby preventing fuel failure.

As described in LCO 3.0.7, compliance with Special Operations LCOs is optional, and therefore, no criteria of 10 CFR 50.36(c)(2)(ii) (Ref. 4) apply. Special Operations LCOs provide flexibility to perform certain operations by appropriately modifying requirements of other LCOs. A discussion of the criteria satisfied for the other LCOs is provided in their respective Bases.

---

LCO

As described in LCO 3.0.7, compliance with this Special Operations LCO is optional. MODES 3, 4, and 5 operations not specified in Table 1.1-1 can be performed in accordance with other Special Operations LCOs (i.e., LCO 3.10.1, "Inservice Leak and Hydrostatic Testing Operation," LCO 3.10.3, "Single Control Rod Withdrawal—Hot Shutdown," LCO 3.10.4, "Single Control Rod Withdrawal—Cold Shutdown," and LCO 3.10.8, "SDM Test—Refueling") without meeting this LCO or its ACTIONS. If any testing is performed that involves the reactor mode switch interlocks and requires repositioning beyond that specified in Table 1.1-1 for the current MODE of operation, the testing can be performed, provided all interlock functions potentially defeated are administratively controlled. In MODES 3, 4, and 5 with the reactor mode switch in shutdown as specified in Table 1.1-1, all control rods are fully inserted and a control rod block is initiated. Therefore, all control rods in core cells that contain one or more fuel assemblies must be verified

(continued)

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BASES

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LCO  
(continued)

fully inserted while in MODES 3, 4, and 5, with the reactor mode switch in other than the shutdown position. The additional LCO requirement to preclude CORE ALTERATIONS is appropriate for MODE 5 operations, as discussed below, and is inherently met in MODES 3 and 4 by the definition of CORE ALTERATIONS, which cannot be performed with the vessel head in place.

In MODE 5, with the reactor mode switch in the refuel position, only one control rod can be withdrawn under the refuel position one-rod-out interlock (LCO 3.9.2, "Refuel Position One-Rod-Out Interlock"). The refueling equipment interlocks (LCO 3.9.1, "Refueling Equipment Interlocks") appropriately control other CORE ALTERATIONS. Due to the increased potential for error in controlling these multiple interlocks, and the limited duration of tests involving the reactor mode switch position, conservative controls are required, consistent with MODES 3 and 4. The additional controls of administratively not permitting CORE ALTERATIONS will adequately ensure that the reactor does not become critical during these tests.

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APPLICABILITY

Any required periodic interlock testing involving the reactor mode switch, while in MODES 1 and 2, can be performed without the need for Special Operations exceptions. Mode switch manipulations in these MODES would likely result in unit trips. In MODES 3, 4, and 5, this Special Operations LCO is only permitted to be used to allow reactor mode switch interlock testing that cannot conveniently be performed without this allowance or testing that must be performed prior to entering another MODE. Such interlock testing may consist of required Surveillances, or may be the result of maintenance, repair, or troubleshooting activities. In MODES 3, 4, and 5, the interlock functions provided by the reactor mode switch in shutdown (i.e., all control rods inserted and incapable of withdrawal) and refueling (i.e., refueling interlocks to prevent inadvertent criticality during CORE ALTERATIONS) positions can be administratively controlled adequately during the performance of certain tests.

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(continued)

BASES (continued)

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ACTIONS

A.1, A.2, A.3.1, and A.3.2

These Required Actions are provided to restore compliance with the Technical Specifications overridden by this Special Operations LCO. Restoring compliance will also result in exiting the Applicability of this Special Operations LCO.

All CORE ALTERATIONS, except control rod insertion, if in progress, are immediately suspended in accordance with Required Action A.1, and all insertable control rods in core cells that contain one or more fuel assemblies are fully inserted within 1 hour, in accordance with Required Action A.2. This will preclude potential mechanisms that could lead to criticality. 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. Suspension of CORE ALTERATIONS shall not preclude the completion of movement of a component to a safe condition. Placing the reactor mode switch in the shutdown position will ensure that all inserted control rods remain inserted and result in operating in accordance with Table 1.1-1. Alternatively, if in MODE 5, the reactor mode switch may be placed in the refuel position, which will also result in operating in accordance with Table 1.1-1. A Note is added to Required Action A.3.2 to indicate that this Required Action is not applicable in MODES 3 and 4, since only the shutdown position is allowed in these MODES. The allowed Completion Time of 1 hour for Required Action A.2, Required Action A.3.1, and Required Action A.3.2 provides sufficient time to normally insert the control rods and place the reactor mode switch in the required position, based on operating experience, and is acceptable given that all operations that could increase core reactivity have been suspended.

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SURVEILLANCE  
REQUIREMENTS

SR 3.10.2.1 and SR 3.10.2.2

Meeting the requirements of this Special Operations LCO maintains operation consistent with or conservative to operating with the reactor mode switch in the shutdown position (or the refuel position for MODE 5). The functions of the reactor mode switch interlocks that are not in effect, due to the testing in progress, are adequately compensated for by the Special Operations LCO requirements.

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BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.10.2.1 and SR 3.10.2.2 (continued)

The administrative controls are to be periodically verified to ensure that the operational requirements continue to be met. In addition, the all rods fully inserted Surveillance (SR 3.10.2.1) must be verified by a second licensed operator (Reactor Operator or Senior Reactor Operator) or other technically qualified member of the unit technical staff. A member of the technical staff is considered to be qualified if he has completed applicable qualification requirements in accordance with required plant training and qualification procedures. The Surveillances performed at the 12 hour and 24 hour Frequencies are intended to provide appropriate assurance that each operating shift is aware of and verifies compliance with these Special Operations LCO requirements.

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REFERENCES

1. UFSAR, Section 7.2.1.1.2.13.
  2. UFSAR, Section 15.4.5.1.
  3. UFSAR, Section 15.4.5.2.
  4. 10 CFR 50.36(c)(2)(ii).
- 
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B 3.10 SPECIAL OPERATIONS

B 3.10.3 Single Control Rod Withdrawal—Hot Shutdown

BASES

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BACKGROUND

The purpose of this MODE 3 Special Operations LCO is to permit the withdrawal of a single control rod for testing while in hot shutdown, by imposing certain restrictions. In MODE 3, the reactor mode switch is in the shutdown position, and all control rods are inserted and blocked from withdrawal. Many systems and functions are not required in these conditions, due to the other installed interlocks that are actuated when the reactor mode switch is in the shutdown position. However, circumstances may arise while in MODE 3 that present the need to withdraw a single control rod for various tests (e.g., friction tests, scram timing, and coupling integrity checks). These single control rod withdrawals are normally accomplished by selecting the refuel position for the reactor mode switch. This Special Operations LCO provides the appropriate additional controls to allow a single control rod withdrawal in MODE 3.

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APPLICABLE  
SAFETY ANALYSES

With the reactor mode switch in the refuel position, the analyses for control rod withdrawal during refueling are applicable and, provided the assumptions of these analyses are satisfied in MODE 3, these analyses will bound the consequences of an accident. Explicit safety analyses in the UFSAR (Ref. 1) demonstrate that the functioning of the refueling interlocks and adequate SDM will preclude unacceptable reactivity excursions.

Refueling interlocks restrict the movement of control rods to reinforce operational procedures that prevent the reactor from becoming critical. These interlocks prevent the withdrawal of more than one control rod. Under these conditions, since only one control rod can be withdrawn, the core will always be shut down even with the highest worth control rod withdrawn if adequate SDM exists.

The control rod scram function provides backup protection to normal refueling procedures and the refueling interlocks, which prevent inadvertent criticalities during refueling.

(continued)

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BASES

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APPLICABLE  
SAFETY ANALYSES  
(continued)

Alternate backup protection can be obtained by ensuring that a five by five array of control rods, centered on the withdrawn control rod, are inserted and incapable of withdrawal.

As described in LCO 3.0.7, compliance with Special Operations LCOs is optional, and therefore, no criteria of 10 CFR 50.36(c)(2)(ii) (Ref. 2) apply. Special Operations LCOs provide flexibility to perform certain operations by appropriately modifying requirements of other LCOs. A discussion of the criteria satisfied for the other LCOs is provided in their respective Bases.

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LCO

As described in LCO 3.0.7, compliance with this Special Operations LCO is optional. Operation in MODE 3 with the reactor mode switch in the refuel position can be performed in accordance with other Special Operations LCOs (i.e., LCO 3.10.2, "Reactor Mode Switch Interlock Testing," without meeting this Special Operations LCO or its ACTIONS. However, if a single control rod withdrawal is desired in MODE 3, controls consistent with those required during refueling must be implemented and this Special Operations LCO applied. "Withdrawal" in this application includes the actual withdrawal of the control rod as well as maintaining the control rod in a position other than the full-in position, and reinserting the control rod. The refueling interlocks of LCO 3.9.2, "Refuel Position One-Rod-Out Interlock," required by this Special Operations LCO, will ensure that only one control rod can be withdrawn.

To back up the refueling interlocks (LCO 3.9.2), the ability to scram the withdrawn control rod in the event of an inadvertent criticality is provided by this Special Operations LCO's requirements in Item d.1. Alternately, provided a sufficient number of control rods in the vicinity of the withdrawn control rod are known to be inserted and incapable of withdrawal (Item d.2), the possibility of criticality on withdrawal of this control rod is sufficiently precluded, so as not to require the scram capability of the withdrawn control rod. Also, once this alternate (Item d.2) is completed, the SDM requirement to account for both the withdrawn-untrippable control rod and

(continued)

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BASES

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LCO  
(continued)            the highest worth control rod may be changed to allow the withdrawn-untrippable control rod to be the single highest worth control rod.

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APPLICABILITY            Control rod withdrawals are adequately controlled in MODES 1, 2, and 5 by existing LCOs. In MODES 3 and 4, control rod withdrawal is only allowed if performed in accordance with this Special Operations LCO or Special Operations LCO 3.10.4, and if limited to one control rod. This allowance is only provided with the reactor mode switch in the refuel position. For these conditions, the one-rod-out interlock (LCO 3.9.2), control rod position indication (LCO 3.9.4, "Control Rod Position Indication"), full insertion requirements for all other control rods and scram functions (LCO 3.3.1.1, "Reactor Protection System (RPS) Instrumentation," and LCO 3.9.5, "Control Rod OPERABILITY—Refueling"), or the added administrative controls in Item d.2 of this Special Operations LCO, minimize potential reactivity excursions.

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ACTIONS                    A Note has been provided to modify the ACTIONS related to a single control rod withdrawal while in MODE 3. Section 1.3, Completion Times, specifies 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 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 each requirement of the LCO not met provide appropriate compensatory measures for separate requirements that are not met. As such, a Note has been provided that allows separate Condition entry for each requirement of the LCO.

A.1

If one or more of the requirements specified in this Special Operations LCO are not met, the ACTIONS applicable to the stated requirements of the affected LCOs are immediately entered as directed by Required Action A.1. Required Action A.1 has been modified by a Note that clarifies the

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BASES

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ACTIONS

A.1 (continued)

intent of any other LCO's Required Action, to insert all control rods. This Required Action includes exiting this Special Operations Applicability by returning the reactor mode switch to the shutdown position. A second Note has been added, which clarifies that this Required Action is only applicable if the requirements not met are for an affected LCO.

A.2.1 and A.2.2

Required Actions A.2.1 and A.2.2 are alternate Required Actions that can be taken instead of Required Action A.1 to restore compliance with the normal MODE 3 requirements, thereby exiting this Special Operations LCO's Applicability. Actions must be initiated immediately to insert all insertable control rods. Actions must continue until all such control rods are fully inserted. Placing the reactor mode switch in the shutdown position will ensure all inserted rods remain inserted and restore operation in accordance with Table 1.1-1. The allowed Completion Time of 1 hour to place the reactor mode switch in the shutdown position provides sufficient time to normally insert the control rods.

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SURVEILLANCE  
REQUIREMENTS

SR 3.10.3.1, SR 3.10.3.2, and SR 3.10.3.3

The other LCOs made applicable in this Special Operations LCO are required to have their Surveillances met to establish that this Special Operations LCO is being met. If the local array of control rods is inserted and disarmed while the scram function for the withdrawn rod is not available, periodic verification in accordance with SR 3.10.3.2 is required to preclude the possibility of criticality. SR 3.10.3.2 has been modified by a Note, which clarifies that this SR is not required to be met if SR 3.10.3.1 is satisfied for LCO 3.10.3.d.1 requirements, since SR 3.10.3.2 demonstrates that the alternative LCO 3.10.3.d.2 requirements are satisfied. Also, SR 3.10.3.3 verifies that all control rods other than the control rod being withdrawn are fully inserted. The 24 hour Frequency is acceptable because of the administrative

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BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.10.3.1, SR 3.10.3.2, and SR 3.10.3.3 (continued)

controls on control rod withdrawal, the protection afforded by the LCOs involved, and hardwire interlocks that preclude additional control rod withdrawals.

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REFERENCES

1. UFSAR, Section 15.4.5.1.
  2. 10 CFR 50.36(c)(2)(ii).
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B 3.10 SPECIAL OPERATIONS

B 3.10.4 Single Control Rod Withdrawal—Cold Shutdown

BASES

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BACKGROUND

The purpose of this MODE 4 Special Operations LCO is to permit the withdrawal of a single control rod for testing or maintenance, while in cold shutdown, by imposing certain restrictions. In MODE 4, the reactor mode switch is in the shutdown position, and all control rods are inserted and blocked from withdrawal. Many systems and functions are not required in these conditions, due to the installed interlocks associated with the reactor mode switch in the shutdown position. Circumstances may arise while in MODE 4, however, that present the need to withdraw a single control rod for various tests (e.g., friction tests, scram time testing, and coupling integrity checks). Certain situations may also require the removal of the associated control rod drive (CRD). These single control rod withdrawals and possible subsequent removals are normally accomplished by selecting the refuel position for the reactor mode switch.

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APPLICABLE  
SAFETY ANALYSES

With the reactor mode switch in the refuel position, the analyses for control rod withdrawal during refueling are applicable and, provided the assumptions of these analyses are satisfied in MODE 4, these analyses will bound the consequences of an accident. Explicit safety analyses in the UFSAR (Ref. 1) demonstrate that the functioning of the refueling interlocks and adequate SDM will preclude unacceptable reactivity excursions.

Refueling interlocks restrict the movement of control rods to reinforce operational procedures that prevent the reactor from becoming critical. These interlocks prevent the withdrawal of more than one control rod. Under these conditions, since only one control rod can be withdrawn, the core will always be shut down even with the highest worth control rod withdrawn if adequate SDM exists.

The control rod scram function provides backup protection in the event normal refueling procedures and the refueling interlocks fail to prevent inadvertent criticalities during refueling. Alternate backup protection can be obtained by

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BASES

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APPLICABLE  
SAFETY ANALYSES  
(continued)

ensuring that a five by five array of control rods, centered on the withdrawn control rod, are inserted and incapable of withdrawal. This alternate backup protection is required when removing a CRD because this removal renders the withdrawn control rod incapable of being scrambled.

As described in LCO 3.0.7, compliance with Special Operations LCOs is optional, and therefore, no criteria of 10 CFR 50.36(c)(2)(ii) (Ref. 2) apply. Special Operations LCOs provide flexibility to perform certain operations by appropriately modifying requirements of other LCOs. A discussion of the criteria satisfied for the other LCOs is provided in their respective Bases.

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LCO

As described in LCO 3.0.7, compliance with this Special Operations LCO is optional. Operation in MODE 4 with the reactor mode switch in the refuel position can be performed in accordance with other LCOs (i.e., Special Operations LCO 3.10.2, "Reactor Mode Switch Interlock Testing") without meeting this Special Operations LCO or its ACTIONS. If a single control rod withdrawal is desired in MODE 4, controls consistent with those required during refueling must be implemented and this Special Operations LCO applied. "Withdrawal" in this application includes the actual withdrawal of the control rod as well as maintaining the control rod in a position other than the full-in position, and reinserting the control rod.

The refueling interlocks of LCO 3.9.2, "Refuel Position One-Rod-Out Interlock," required by this Special Operations LCO will ensure that only one control rod can be withdrawn. At the time CRD removal begins, the disconnection of the position indication probe will cause LCO 3.9.4, "Control Rod Position Indication," and therefore, LCO 3.9.2 to fail to be met. Therefore, prior to commencing CRD removal, a control rod withdrawal block is required to be inserted to ensure that no additional control rods can be withdrawn and that compliance with this Special Operations LCO is maintained.

To back up the refueling interlocks (LCO 3.9.2) or the control rod withdrawal block, the ability to scram the withdrawn control rod in the event of an inadvertent criticality is provided by the Special Operations LCO requirements in Item c.1. Alternatively, when the scram

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BASES

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LCO  
(continued)

function is not OPERABLE, or when the CRD is to be removed, a sufficient number of rods in the vicinity of the withdrawn control rod are required to be inserted and made incapable of withdrawal (Item c.2). This precludes the possibility of criticality upon withdrawal of this control rod. Also, once this alternate (Item c.2) is completed, the SDM requirement to account for both the withdrawn-untrippable control rod and the highest worth control rod may be changed to allow the withdrawn-untrippable control rod to be the single highest worth control rod.

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APPLICABILITY

Control rod withdrawals are adequately controlled in MODES 1, 2, and 5 by existing LCOs. In MODES 3 and 4, control rod withdrawal is only allowed if performed in accordance with Special Operations LCO 3.10.3, or this Special Operations LCO, and if limited to one control rod. This allowance is only provided with the reactor mode switch in the refuel position.

During these conditions, the full insertion requirements for all other control rods, the one-rod-out interlock (LCO 3.9.2), control rod position indication (LCO 3.9.4), and scram functions (LCO 3.3.1.1, "Reactor Protection System (RPS) Instrumentation," and LCO 3.9.5, "Control Rod OPERABILITY—Refueling"), or the added administrative controls in Item b.2 and Item c.2 of this Special Operations LCO, provide mitigation of potential reactivity excursions.

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ACTIONS

A Note has been provided to modify the ACTIONS related to a single control rod withdrawal while in MODE 4. 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 each requirement of the LCO not met provide appropriate compensatory measures for separate requirements that are not met. As such, a Note has been provided that allows separate Condition entry for each requirement of the LCO.

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BASES

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ACTIONS  
(continued)

A.1, A.2.1, and A.2.2

If one or more of the requirements of this Special Operations LCO are not met with the affected control rod insertable, these Required Actions restore operation consistent with normal MODE 4 conditions (i.e., all rods inserted) or with the exceptions allowed in this Special Operations LCO. Required Action A.1 has been modified by a Note that clarifies the intent of any other LCO's Required Action to insert all control rods. This Required Action includes exiting this Special Operations Applicability by returning the reactor mode switch to the shutdown position. A second Note has been added to Required Action A.1 to clarify that this Required Action is only applicable if the requirements not met are for an affected LCO.

Required Actions A.2.1 and A.2.2 are specified, based on the assumption that the control rod is being withdrawn. If the control rod is still insertable, actions must be immediately initiated to fully insert all insertable control rods and within 1 hour place the reactor mode switch in the shutdown position. Actions must continue until all such control rods are fully inserted. The allowed Completion Time of 1 hour for placing the reactor mode switch in the shutdown position provides sufficient time to normally insert the control rods.

B.1, B.2.1, and B.2.2

If one or more of the requirements of this Special Operations LCO are not met with the affected control rod not insertable, withdrawal of the control rod and removal of the associated CRD must be immediately suspended. If the CRD has been removed, such that the control rod is not insertable, the Required Actions require the most expeditious action be taken to either initiate action to restore the CRD and insert its control rod, or initiate action to restore compliance with this Special Operations LCO.

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(continued)

BASES (continued)

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SURVEILLANCE  
REQUIREMENTS

SR 3.10.4.1, SR 3.10.4.2, SR 3.10.4.3, and SR 3.10.4.4

The other LCOs made applicable by this Special Operations LCO are required to have their associated surveillances met to establish that this Special Operations LCO is being met. If the local array of control rods is inserted and electrically disarmed while the scram function for the withdrawn rod is not available, periodic verification is required to ensure that the possibility of criticality remains precluded. Verification that all the other control rods are fully inserted is required to meet the SDM requirements. Verification that a control rod withdrawal block has been inserted ensures that no other control rods can be inadvertently withdrawn under conditions when position indication instrumentation is inoperable for the affected control rod. The 24 hour Frequency is acceptable because of the administrative controls on control rod withdrawals, the protection afforded by the LCOs involved, and hardwire interlocks to preclude an additional control rod withdrawal.

SR 3.10.4.2 and SR 3.10.4.4 have been modified by Notes, which clarify that these SRs are not required to be met if the alternative requirements demonstrated by SR 3.10.4.1 are satisfied.

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REFERENCES

1. UFSAR, Section 15.4.5.
  2. 10 CFR 50.36(c)(2)(ii).
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## B 3.10 SPECIAL OPERATIONS

### B 3.10.5 Single Control Rod Drive (CRD) Removal—Refueling

#### BASES

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#### BACKGROUND

The purpose of this MODE 5 Special Operations LCO is to permit the removal of a single CRD during refueling operations by imposing certain administrative controls. Refueling interlocks restrict the movement of control rods and the operation of the refueling equipment to reinforce operational procedures that prevent the reactor from becoming critical during refueling operations. During refueling operations, no more than one control rod is permitted to be withdrawn from a core cell containing one or more fuel assemblies. The refueling interlocks use the "full-in" position indicators to determine the position of all control rods. If the "full-in" position signal is not present for every control rod, then the all rods in permissive for the refueling equipment interlocks is not present and fuel loading is prevented. Also, the refuel position one-rod-out interlock will not allow the withdrawal of a second control rod.

The control rod scram function provides backup protection in the event normal refueling procedures, and the refueling interlocks described above fail to prevent inadvertent criticalities during refueling. The requirement for this function to be OPERABLE precludes the possibility of removing the CRD once a control rod is withdrawn from a core cell containing one or more fuel assemblies. This Special Operations LCO provides controls sufficient to ensure the possibility of an inadvertent criticality is precluded, while allowing a single CRD to be removed from a core cell containing one or more fuel assemblies. The removal of the CRD involves disconnecting the position indication probe, which may cause noncompliance with LCO 3.9.4, "Control Rod Position Indication," and, therefore, LCO 3.9.1, "Refueling Equipment Interlocks," and LCO 3.9.2, "Refueling Position One-Rod-Out Interlock." The CRD removal also requires isolation of the CRD from the CRD Hydraulic System, thereby causing inoperability of the control rod (LCO 3.9.5, "Control Rod OPERABILITY—Refueling").

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BASES (continued)

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APPLICABLE  
SAFETY ANALYSES

With the reactor mode switch in the refuel position, the analyses for control rod withdrawal during refueling are applicable and, provided the assumptions of these analyses are satisfied, these analyses will bound the consequences of accidents. Explicit safety analyses in the UFSAR (Ref. 1) demonstrate that proper operation of the refueling interlocks and adequate SDM will preclude unacceptable reactivity excursions.

Refueling interlocks restrict the movement of control rods and the operation of the refueling equipment to reinforce operational procedures that prevent the reactor from becoming critical. These interlocks prevent the withdrawal of more than one control rod. Under these conditions, since only one control rod can be withdrawn, the core will always be shut down even with the highest worth control rod withdrawn if adequate SDM exists. By requiring all other control rods to be inserted and a control rod withdrawal block initiated, the function of the inoperable one-rod-out interlock (LCO 3.9.2) is adequately maintained. This Special Operations LCO requirement that no other CORE ALTERATIONS are in progress adequately compensates for the inoperable all rods in permissive for the refueling equipment interlocks (LCO 3.9.1).

The control rod scram function provides backup protection to normal refueling procedures and the refueling interlocks, which prevent inadvertent criticalities during refueling. Since the scram function and refueling interlocks may be suspended, alternate backup protection required by this Special Operations LCO is obtained by ensuring that a five by five array of control rods, centered on the withdrawn control rod, are inserted and are incapable of being withdrawn, and all other control rods are inserted and incapable of being withdrawn (by insertion of a control rod block).

As described in LCO 3.0.7, compliance with Special Operations LCOs is optional, and therefore, no criteria of 10 CFR 50.36(c)(2)(ii) (Ref. 2) apply. Special Operations LCOs provide flexibility to perform certain operations by appropriately modifying requirements of other LCOs. A discussion of the criteria satisfied for the other LCOs is provided in their respective Bases.

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BASES (continued)

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LCO As described in LCO 3.0.7, compliance with this Special Operations LCO is optional. Operation in MODE 5 with any of the following LCOs, LCO 3.3.1.1, "Reactor Protection System (RPS) Instrumentation," LCO 3.3.8.2, "Reactor Protection System (RPS) Electric Power Monitoring," LCO 3.9.1, LCO 3.9.2, LCO 3.9.4, or LCO 3.9.5 not met, can be performed in accordance with the Required Actions of these LCOs without meeting this Special Operations LCO or its ACTIONS. However, if a single CRD removal from a core cell containing one or more fuel assemblies is desired in MODE 5, controls consistent with those required by LCO 3.3.1.1, LCO 3.3.8.2, LCO 3.9.1, LCO 3.9.2, LCO 3.9.4, and LCO 3.9.5 must be implemented, and this Special Operations LCO applied.

By requiring all other control rods to be inserted and a control rod withdrawal block initiated, the function of the inoperable one-rod-out interlock (LCO 3.9.2) is adequately maintained. A control rod withdrawal block may be initiated by deselecting all selected control rods. This Special Operations LCO requirement that no other CORE ALTERATIONS are in progress adequately compensates for the inoperable all rods in permissive for the refueling equipment interlocks (LCO 3.9.1). Ensuring that the five by five array of control rods, centered on the withdrawn control rod, are inserted and incapable of withdrawal adequately satisfies the backup protection that LCO 3.3.1.1 and LCO 3.9.2 would have otherwise provided. Also, once these requirements (Items a, b, and c) are completed, the SDM requirement to account for both the withdrawn-untrippable control rod and the highest worth control rod may be changed to allow the withdrawn-untrippable control rod to be the single highest worth control rod.

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APPLICABILITY Operation in MODE 5 is controlled by existing LCOs. The allowance to comply with this Special Operations LCO in lieu of the ACTIONS of LCO 3.3.1.1, LCO 3.3.8.2, LCO 3.9.1, LCO 3.9.2, LCO 3.9.4, and LCO 3.9.5 is appropriately controlled with the additional administrative controls required by this Special Operations LCO, which reduce the potential for reactivity excursions.

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BASES (continued)

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ACTIONS

A.1, A.2.1, and A.2.2

If one or more of the requirements of this Special Operations LCO are not met, the immediate implementation of these Required Actions restores operation consistent with the normal requirements for failure to meet LCO 3.3.1.1, LCO 3.9.1, LCO 3.9.2, LCO 3.9.4, and LCO 3.9.5 (i.e., all control rods inserted) or with the allowances of this Special Operations LCO. The Completion Times for Required Action A.1, Required Action A.2.1, and Required Action A.2.2 are intended to require that these Required Actions be implemented in a very short time and carried through in an expeditious manner to either initiate action to restore the CRD and insert its control rod, or initiate action to restore compliance with this Special Operations LCO. Actions must continue until either Required Action A.2.1 or Required Action A.2.2 is satisfied.

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SURVEILLANCE  
REQUIREMENTS

SR 3.10.5.1, SR 3.10.5.2, SR 3.10.5.3, SR 3.10.5.4,  
and SR 3.10.5.5

Verification that all the control rods, other than the control rod withdrawn for the removal of the associated CRD, are fully inserted is required to ensure the SDM is within limits. Verification that the local five by five array of control rods, other than the control rod withdrawn for removal of the associated CRD, is inserted and electrically disarmed, while the scram function for the withdrawn rod is not available, is required to ensure that the possibility of criticality remains precluded. Verification that a control rod withdrawal block has been inserted ensures that no other control rods can be inadvertently withdrawn under conditions when position indication instrumentation is inoperable for the withdrawn control rod. The Surveillance for LCO 3.1.1, which is made applicable by this Special Operations LCO, is required in order to establish that this Special Operations LCO is being met. Verification that no other CORE ALTERATIONS are being made is required to ensure the assumptions of the safety analysis are satisfied.

Periodic verification of the administrative controls established by this Special Operations LCO is prudent to preclude the possibility of an inadvertent criticality. The 24 hour Frequency is acceptable, given the administrative controls on control rod removal and hardwire interlock to block an additional control rod withdrawal.

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(continued)

BASES (continued)

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REFERENCES            1.    UFSAR, Section 15.4.5.  
                             2.    10 CFR 50.36(c)(2)(ii).

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B 3.10 SPECIAL OPERATIONS

B 3.10.6 Multiple Control Rod Withdrawal—Refueling

BASES

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BACKGROUND

The purpose of this MODE 5 Special Operations LCO is to permit multiple control rod withdrawal during refueling by imposing certain administrative controls.

Refueling interlocks restrict the movement of control rods and the operation of the refueling equipment to reinforce operational procedures that prevent the reactor from becoming critical during refueling operations. During refueling operations, no more than one control rod is permitted to be withdrawn from a core cell containing one or more fuel assemblies. When all four fuel assemblies are removed from a cell, the control rod may be withdrawn with no restrictions. Any number of control rods may be withdrawn and removed from the reactor vessel if their cells contain no fuel.

The refueling interlocks use the "full-in" position indicators to determine the position of all control rods. If the "full-in" position signal is not present for every control rod, then the all rods in permissive for the refueling equipment interlocks is not present and fuel loading is prevented. Also, the refuel position one-rod-out interlock will not allow the withdrawal of a second control rod.

To allow more than one control rod to be withdrawn during refueling, these interlocks must be defeated. This Special Operations LCO establishes the necessary administrative controls to allow bypassing the "full-in" position indicators.

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APPLICABLE  
SAFETY ANALYSES

Explicit safety analyses in the UFSAR (Ref. 1) demonstrate that the functioning of the refueling interlocks and adequate SDM will prevent unacceptable reactivity excursions during refueling. To allow multiple control rod withdrawals, control rod removals, associated control rod drive (CRD) removal, or any combination of these, the "full-in" position indication is allowed to be bypassed for each withdrawn control rod if all fuel has been removed from

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BASES

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APPLICABLE  
SAFETY ANALYSES  
(continued)

the cell. With no fuel assemblies in the core cell, the associated control rod has no reactivity control function and is not required to remain inserted. Prior to reloading fuel into the cell, however, the associated control rod must be inserted to ensure that an inadvertent criticality does not occur, as evaluated in the Reference 1 analysis.

As described in LCO 3.0.7, compliance with Special Operations LCOs is optional, and therefore, no criteria of 10 CFR 50.36(c)(2)(ii) (Ref. 2) apply. Special Operations LCOs provide flexibility to perform certain operations by appropriately modifying requirements of other LCOs. A discussion of the criteria satisfied for the other LCOs is provided in their respective Bases.

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LCO

As described in LCO 3.0.7, compliance with this Special Operations LCO is optional. Operation in MODE 5 with either LCO 3.9.3, "Control Rod Position," LCO 3.9.4, "Control Rod Position Indication," or LCO 3.9.5, "Control Rod OPERABILITY—Refueling," not met, can be performed in accordance with the Required Actions of these LCOs without meeting this Special Operations LCO or its ACTIONS. If multiple control rod withdrawal or removal, or CRD removal is desired, all four fuel assemblies are required to be removed from the associated cells. Prior to entering this LCO, any fuel remaining in a cell whose CRD was previously removed under the provisions of another LCO must be removed. "Withdrawal" in this application includes the actual withdrawal of the control rod as well as maintaining the control rod in a position other than the full-in position, and reinserting the control rod.

When fuel is loaded into the core with multiple control rods withdrawn, special spiral reload sequences are used to ensure that reactivity additions are minimized. Spiral reloading encompasses reloading a cell (four fuel locations immediately adjacent to a control rod) on the edge of a continuous fueled region (the cell can be loaded in any sequence). Otherwise, all control rods must be fully inserted before loading fuel.

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APPLICABILITY

Operation in MODE 5 is controlled by existing LCOs. The exceptions from other LCO requirements (e.g., the ACTIONS of LCO 3.9.3, LCO 3.9.4, or LCO 3.9.5) allowed by this Special

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BASES

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APPLICABILITY (continued) Operations LCO are appropriately controlled by requiring all fuel to be removed from cells whose "full-in" indicators are allowed to be bypassed.

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ACTIONS A.1, A.2, A.3.1, and A.3.2

If one or more of the requirements of this Special Operations LCO are not met, the immediate implementation of these Required Actions restores operation consistent with the normal requirements for refueling (i.e., all control rods inserted in core cells containing one or more fuel assemblies) or with the exceptions granted by this Special Operations LCO. The Completion Times for Required Action A.1, Required Action A.2, Required Action A.3.1, and Required Action A.3.2 are intended to require that these Required Actions be implemented in a very short time and carried through in an expeditious manner to either initiate action to restore the affected CRDs and insert their control rods, or initiate action to restore compliance with this Special Operations LCO.

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SURVEILLANCE REQUIREMENTS SR 3.10.6.1, SR 3.10.6.2, and SR 3.10.6.3

Periodic verification of the administrative controls established by this Special Operations LCO is prudent to preclude the possibility of an inadvertent criticality. The 24 hour Frequency is acceptable, given the administrative controls on fuel assembly and control rod removal, and takes into account other indications of control rod status available in the control room.

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REFERENCES

1. UFSAR, Section 15.4.5.
2. 10 CFR 50.36(c)(2)(ii).

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B 3.10 SPECIAL OPERATIONS

B 3.10.7 Control Rod Testing—Operating

BASES

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BACKGROUND

The purpose of this Special Operations LCO is to permit control rod testing, while in MODES 1 and 2, by imposing certain administrative controls. 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"), such that only the specified control rod sequences and relative positions required by LCO 3.1.6, "Rod Pattern Control," are allowed over the operating range from all control rods inserted to the low power setpoint (LPSP) of the RWM. The sequences effectively limit the potential amount and rate of reactivity increase that could occur during a control rod drop accident (CRDA). During these conditions, control rod testing is sometimes required that may result in control rod patterns not in compliance with the prescribed sequences of LCO 3.1.6. These tests include SDM demonstrations, control rod scram time testing, and control rod friction testing. This Special Operations LCO provides the necessary exemption to the requirements of LCO 3.1.6 and provides additional administrative controls to allow the deviations in such tests from the prescribed sequences in LCO 3.1.6.

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APPLICABLE  
SAFETY ANALYSES

The analytical methods and assumptions used in evaluating the CRDA are summarized in Reference 1. CRDA analyses assume the reactor operator follows prescribed withdrawal sequences. These sequences define the potential initial conditions for the CRDA analyses. The RWM provides backup to operator control of the withdrawal sequences to ensure the initial conditions of the CRDA analyses are not violated. For special sequences developed for control rod testing, the initial control rod patterns assumed in the safety analysis of Reference 1 may not be preserved. Therefore special CRDA analyses are required to demonstrate that these special sequences will not result in unacceptable consequences, should a CRDA occur during the testing. These analyses, performed in accordance with an NRC approved methodology, are dependent on the specific test being performed.

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BASES

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APPLICABLE  
SAFETY ANALYSES  
(continued)

As described in LCO 3.0.7, compliance with Special Operations LCOs is optional, and therefore, no criteria of 10 CFR 50.36(c)(2)(ii) (Ref. 2) apply. Special Operations LCOs provide flexibility to perform certain operations by appropriately modifying requirements of other LCOs. A discussion of the criteria satisfied for the other LCOs is provided in their respective Bases.

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LCO

As described in LCO 3.0.7, compliance with this Special Operations LCO is optional. Control rod testing may be performed in compliance with the prescribed sequences of LCO 3.1.6, and during these tests, no exceptions to the requirements of LCO 3.1.6 are necessary. For testing performed with a sequence not in compliance with LCO 3.1.6, the requirements of LCO 3.1.6 may be suspended, provided additional administrative controls are placed on the test to ensure that the assumptions of the special safety analysis for the test sequence are satisfied. Assurances that the test sequence is followed can be provided by either programming the test sequence into the RWM, with conformance verified as specified in SR 3.3.2.1.8 and allowing the RWM to monitor control rod withdrawal and provide appropriate control rod blocks if necessary, or by verifying conformance to the approved test sequence by a second licensed operator or other qualified member of the technical staff. These controls are consistent with those normally applied to operation in the startup range as defined in the SRs and ACTIONS of LCO 3.3.2.1, "Control Rod Block Instrumentation."

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APPLICABILITY

Control rod testing, while in MODES 1 and 2, with THERMAL POWER greater than 10% RTP, is adequately controlled by the existing LCOs on power distribution limits and control rod block instrumentation. Control rod movement during these conditions is not restricted to prescribed sequences and can be performed within the constraints of LCO 3.2.1, "AVERAGE PLANAR LINEAR HEAT GENERATION RATE (APLHGR)," LCO 3.2.2, "MINIMUM CRITICAL POWER RATIO (MCPR)," and LCO 3.3.2.1. With THERMAL POWER less than or equal to 10% RTP, the provisions of this Special Operations LCO are necessary to perform special tests that are not in conformance with the prescribed sequences of LCO 3.1.6.

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