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RS-02-018

10 CFR 50.90

January 18, 2002

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Clinton Power Station, Unit 1
Facility Operating License No. NPF-62
NRC Docket No. 50-461

Subject: Supplement to License Amendment Request Associated with the Surveillance Requirements for the Main Steam Line Safety Relief Valves

Reference: Letter from J. M. Heffley (AmerGen Energy Company, LLC) to U.S. NRC, "Request for Amendment to Technical Specifications Surveillance Requirements for the Main Steam Line Safety Relief Valves," dated June 21, 2001

In the referenced letter, AmerGen Energy Company (AmerGen), LLC submitted a request for changes to Appendix A, Technical Specifications (TS), of Facility Operating License No. NPF-62 for Clinton Power Station (CPS). The proposed changes would modify TS Surveillance Requirement (SR) 3.4.4.3, SR 3.5.1.7, and SR 3.6.1.6.1. Specifically, the proposed changes will eliminate the TS requirement that each valve opens during the manual actuation of the main steam line safety relief valves (SRVs), including those valves that provide the Automatic Depressurization System (ADS) and the low-low set (LLS) valve functions.

AmerGen is submitting a supplement to the referenced letter. This supplement would remove the wording in the SR frequency that indicates the surveillance is to be performed on a staggered test basis for each valve solenoid. Based on discussions with the NRC, it has been determined that for the proposed test method it is no longer necessary to test the SRV solenoids on a staggered basis. The staggered test basis currently specified in the SR ensures that both solenoids for each actuator are alternately tested every 18 months without excessive opening of the SRV. As stated in the referenced letter, repeated manual actuation of the SRVs can lead to through-seat leakage during plant operation. Therefore, the proposed test method would eliminate the need to test the solenoids on an alternating basis since the SRVs will not be required to open under the revised surveillance testing. In addition, AmerGen is proposing changes to the TS bases for SR 3.4.4.3, SR 3.5.1.7, and SR 3.6.1.6.1. These changes remove reference to the staggered test basis frequency.

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These changes are considered conservative with respect to the original request. Therefore, we have concluded that these changes do not impact the conclusion of the No Significant Hazards Determination discussion provided in the referenced letter.

The attachment to this letter provides the proposed TS change and the changes to the TS Bases. The changes to the TS Bases are provided for information only. These changes will be implemented upon approval of the proposed TS changes, in accordance with the CPS TS Bases Control Program.

Should you have any questions related to this information, please contact Mr. Timothy A. Byam at (630) 657-2804.

Respectfully,

Handwritten signature of K. R. Jury in cursive script.

K. R. Jury
Director – Licensing
Mid-West Regional Operating Group

Attachments:

Affidavit
Attachment: Marked-up Pages for Proposed Changes

cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector – Clinton Power Station
Office of Nuclear Facility Safety – Illinois Department of Nuclear Safety

STATE OF ILLINOIS)
COUNTY OF DUPAGE)
IN THE MATTER OF)
AMERGEN ENERGY COMPANY, LLC) Docket Number
CLINTON POWER STATION, UNIT 1) 50-461

SUBJECT: Supplement to License Amendment Request Associated with the Surveillance Requirements for the Main Steam Line Safety Relief Valves

AFFIDAVIT

I affirm that the content of this transmittal is true and correct to the best of my knowledge, information and belief.



K. A. Ainger
Manager – Licensing

Subscribed and sworn to before me, a Notary Public in and

for the State above named, this 18th day of

January, 2002.



Notary Public



ATTACHMENT

Marked-up Pages for Proposed Changes

REVISED TS PAGES

3.4-61

3.5-5

3.6-23

**REVISED BASES PAGES
(PROVIDED FOR INFORMATION ONLY)**

B 3.4-21

B 3.4-22

B 3.5-12

B 3.5-13

B 3.5-14

B 3.5-14a

B 3.6-37

B 3.6-38

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY								
SR 3.4.4.1	<p>Verify the safety function lift setpoints of the required S/RVs are as follows:</p> <table border="1"> <thead> <tr> <th>Number of S/RVs</th> <th>Setpoint (psig)</th> </tr> </thead> <tbody> <tr> <td>7</td> <td>1165 ± 34.9</td> </tr> <tr> <td>5</td> <td>1180 ± 35.4</td> </tr> <tr> <td>4</td> <td>1190 ± 35.7</td> </tr> </tbody> </table> <p>Following testing, lift settings shall be within ± 1%.</p>	Number of S/RVs	Setpoint (psig)	7	1165 ± 34.9	5	1180 ± 35.4	4	1190 ± 35.7	In accordance with the Inservice Testing Program
Number of S/RVs	Setpoint (psig)									
7	1165 ± 34.9									
5	1180 ± 35.4									
4	1190 ± 35.7									
SR 3.4.4.2	<p>-----NOTE----- Valve actuation may be excluded. -----</p> <p>Verify each required relief function S/RV actuates on an actual or simulated automatic initiation signal.</p>	18 months								
SR 3.4.4.3	<p>-----NOTE----- Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. -----</p> <p>Verify each required S/RV opens actuator strokes when manually actuated.</p>	18 months on a STAGGERED TEST BASIS for each valve solenoid								

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.5.1.5 -----NOTE----- Vessel injection/spray may be excluded. -----</p> <p>Verify each ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal.</p>	<p>18 months</p>
<p>SR 3.5.1.6 -----NOTE----- Valve actuation may be excluded. -----</p> <p>Verify the ADS actuates on an actual or simulated automatic initiation signal.</p>	<p>18 months</p>
<p>SR 3.5.1.7 -----NOTE----- Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. -----</p> <p>Verify each ADS valve opens actuator strokes when manually actuated.</p>	<p>18 months on a STAGGERED TEST BASIS for each valve solenoid</p>
<p>SR 3.5.1.8 -----NOTE----- ECCS actuation instrumentation is excluded. -----</p> <p>Verify the ECCS RESPONSE TIME for each ECCS injection/spray subsystem is within limits.</p>	<p>18 months</p>

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.6.1.6.1 -----NOTE----- Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. -----</p> <p>Verify each LLS valve opens actuator strokes when manually actuated.</p>	<p>18 months on a STAGGERED TEST BASIS for each valve solenoid</p>
<p>SR 3.6.1.6.2 -----NOTE----- Valve actuation may be excluded. -----</p> <p>Verify the LLS System actuates on an actual or simulated automatic initiation signal.</p>	<p>18 months</p>

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.4.4.2 (continued)

The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown these components usually pass the SR when performed at the 18 month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

This SR is modified by a Note that excludes valve actuation. This prevents an RPV pressure blowdown.

SR 3.4.4.3

~~A manual actuation of each required S/RV is performed to verify that the valve is functioning properly. If this testing is performed using reactor steam, adequate reactor steam pressure must be available to perform this test to avoid damaging the valve. Also, adequate steam flow must be passing through the main turbine or turbine bypass valves to continue to control reactor pressure when the S/RVs divert steam flow upon opening. Sufficient time is therefore allowed after the required pressure and flow are achieved to perform this test. Adequate pressure at which this test is to be performed is consistent with the pressure recommended by the valve manufacturer.~~

~~Plant startup is allowed prior to performing this test because valve OPERABILITY and the setpoints for overpressure protection are verified, per ASME requirements, prior to valve installation. Therefore, this SR is modified by a Note that states the Surveillance is not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. The 12 hours allowed for manual actuation after the required pressure and flow are reached is sufficient to achieve stable conditions for testing and provides a reasonable time to complete the SR.~~

~~Alternatively, the S/RV(s) may be manually actuated without reactor steam provided measures are taken to preclude damage to the S/RV upon reclosure.~~

~~If the valve fails to actuate due only to the failure of the solenoid but is capable of opening on overpressure, the safety function of the S/RV is considered OPERABLE.~~

(continued)

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.4.4.3 (continued)

A manual actuation of each required S/RV (those valves removed and replaced to satisfy SR 3.4.4.1) is performed to verify that the valve is functioning properly. This SR can be demonstrated by one of two methods. If performed by Method 1, plant startup is allowed prior to performing this test because valve OPERABILITY and the setpoints for overpressure protection are verified, per ASME requirements (Ref. 6), prior to valve installation. Therefore, this SR is modified by a Note that states the Surveillance is not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. The 12 hours allowed for manual actuation after the required pressure is reached is sufficient to achieve stable conditions for testing and provides a reasonable time to complete the SR. If performed by Method 2, valve OPERABILITY has been demonstrated for all installed S/RVs based upon the successful operation of a test sample of S/RVs.

1. Manual actuation of the S/RV with verification of the response of the turbine control valves or bypass valves, by a change in the measured steam flow, or any other method suitable to verify steam flow (e.g., tailpipe temperature or acoustic monitoring). Adequate reactor steam pressure must be available to perform this test to avoid damaging the valve. Also, adequate flow must be passing through the main turbine or turbine bypass valves to continue to control reactor pressure when the S/RVs divert steam flow upon opening. Sufficient time is therefore allowed after the required pressure and flow are achieved to perform this test. Adequate pressure at which this test is to be performed is consistent with the pressure recommended by the valve manufacturer.
2. The sample population of S/RVs tested to satisfy SR 3.4.4.1 will also be stroked in the relief mode during "as-found" testing to verify proper operation of the S/RV. The successful performance of the test sample of S/RVs provides reasonable assurance that the remaining installed S/RVs will perform in a similar fashion. After the S/RVs are replaced, the relief-mode actuator of the newly-installed S/RVs will be uncoupled from the S/RV stem, and cycled to ensure that no damage has occurred to the S/RV during transportation and installation. Following cycling, the relief-mode actuator is recoupled and the proper positioning of the stem nut is independently verified.

This verifies that each replaced S/RV will properly perform its intended function. If the valve fails to actuate due only to the failure of the solenoid but is capable of opening on overpressure, the safety function of the S/RV is considered OPERABLE.

~~The 18 month on a STAGGERED TEST BASIS Frequency ensures that each solenoid for each S/RV is alternately tested.~~
The 18 month Frequency was developed based on the S/RV tests required by the ASME Boiler and Pressure Vessel Code, Section XI (Ref. 1). Operating experience has shown that these components usually pass the Surveillance when performed at the 18 month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

REFERENCES

1. ASME, Boiler and Pressure Vessel Code, Section III and XI.
 2. USAR, Section 5.2.2.
 3. USAR, Section 15.
 4. NEDC-32202P, "SRV Setpoint Tolerance and Out-of-Service Analysis for Clinton Power Station, "August 1993."
 5. Calculation IP-0-0032.
 6. ASME/ANSI OM-1987, Operation and Maintenance of Nuclear Power Plants, Part 1.
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BASES

SURVEILLANCE
REQUIREMENTS

SR 3.5.1.5 (continued)

was concluded to be acceptable from a reliability standpoint.

This SR is modified by a Note that excludes vessel injection/spray during the Surveillance. Since all active components are testable and full flow can be demonstrated by recirculation through the test line, coolant injection into the RPV is not required during the Surveillance.

SR 3.5.1.6

The ADS designated S/RVs are required to actuate automatically upon receipt of specific initiation signals. A system functional test is performed to demonstrate that the mechanical portions of the ADS function (i.e., solenoids) operate as designed when initiated either by an actual or simulated initiation signal, causing proper actuation of all the required components. SR 3.5.1.7 and the LOGIC SYSTEM FUNCTIONAL TEST performed in LCO 3.3.5.1 overlap this Surveillance to provide complete testing of the assumed safety function.

The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown that these components usually pass the SR when performed at the 18 month Frequency, which is based on the refueling cycle. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

This SR is modified by a Note that excludes valve actuation. This prevents an RPV pressure blowdown.

SR 3.5.1.7

~~A manual actuation of each ADS valve is performed to verify that the valve and solenoids are functioning properly. If this testing is performed using reactor steam, adequate reactor steam pressure must be available to perform this test to avoid damaging the valve. Also, adequate steam flow~~

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BASES

SURVEILLANCE
REQUIREMENTSSR 3.5.1.7 (continued)

~~must be passing through the main turbine or turbine bypass valves to continue to control reactor pressure when the ADS valves divert steam flow upon opening. Sufficient time is therefore allowed, after the required pressure and flow are achieved, to perform this test. Adequate pressure at which this test is to be performed is consistent with the pressure recommended by the valve manufacturer. Reactor startup is allowed prior to performing this test because valve OPERABILITY and the setpoints for overpressure protection are verified, per ASME requirements, prior to valve installation. Therefore, this SR is modified by a Note that states the Surveillance is not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. The 12 hours allowed for manual actuation after the required pressure and flow are reached is sufficient to achieve stable conditions for testing and provides a reasonable time to complete the SR. Alternatively, the S/RV(s) may be manually actuated without reactor steam provided measures are taken to preclude damage to the S/RV upon reclosure.~~

A manual actuation of each required ADS valve (those valves removed and replaced to satisfy SR 3.4.4.1) is performed to verify that the valve is functioning properly. This SR can be demonstrated by one of two methods. If performed by Method 1, plant startup is allowed prior to performing this test because valve OPERABILITY and the setpoints for overpressure protection are verified, per ASME requirements (Ref. 21), prior to valve installation. Therefore, this SR is modified by a Note that states the Surveillance is not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. The 12 hours allowed for manual actuation after the required pressure is reached is sufficient to achieve stable conditions for testing and provides a reasonable time to complete the SR. If performed by Method 2, valve OPERABILITY has been demonstrated for all installed ADS valves based upon the successful operation of a test sample of S/RVs.

1. Manual actuation of the ADS valve, with verification of the response of the turbine control valves or bypass valves, by a change in the measured steam flow, or any other method suitable to verify steam flow (e.g., tailpipe temperature or acoustic monitoring). Adequate reactor steam pressure must be available to perform this test to avoid damaging the valve. Also, adequate steam flow must be passing through the main turbine or turbine bypass valves to continue to control reactor pressure when the ADS valves divert steam flow upon opening. Sufficient time is therefore allowed after the required pressure and flow are achieved to

perform this test. Adequate pressure at which this test is to be performed is consistent with the pressure recommended by the valve manufacturer.

2. The sample population of S/RVs tested to satisfy SR 3.4.4.1 will also be stroked in the relief mode during "as-found" testing to verify proper operation of the S/RV. The successful performance of the test sample of S/RVs provides reasonable assurance that all ADS valves will perform in a similar fashion. After the S/RVs are replaced, the relief-mode actuator of the newly-installed S/RVs will be uncoupled from the S/RV stem, and cycled to ensure that no damage has occurred to the S/RV during transportation and installation. Following cycling, the relief-mode actuator is recoupled and the proper positioning of the stem nut is independently verified. This verifies that each replaced S/RV will properly perform its intended function.

SR 3.5.1.6 and the LOGIC SYSTEM FUNCTIONAL TEST performed in LCO 3.3.5.1 overlap this Surveillance to provide complete testing of the assumed safety function. The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply just prior to or during a startup from a plant outage and the potential for unplanned transients. Operating experience has shown that these components usually pass the SR when performed at the 18 month Frequency, which is based on the refueling cycle. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

~~SR 3.5.1.6 and the LOGIC SYSTEM FUNCTIONAL TEST performed in LCO 3.3.5.1 overlap this Surveillance to provide complete testing of the assumed safety function.~~

~~The Frequency of 18 months on a STAGGERED TEST BASIS ensures that both solenoids for each ADS valve are alternately tested. The Frequency is based on the need to perform this Surveillance under the conditions that apply just prior to or during a startup from a plant outage and the potential for unplanned transients. Operating experience has shown that these components usually pass the SR when performed at the 18 month Frequency, which is based on the refueling cycle. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.~~

SR 3.5.1.8

This SR ensures that the ECCS RESPONSE TIMES are within limits for each of the ECCS injection and spray subsystems. The response time limits (i.e., ≤ 42 seconds for the LPCI subsystems, ≤ 41 seconds for the LPCS subsystem, and ≤ 27 seconds for the HPCS system) are specified in applicable surveillance test procedures. This SR is modified by a

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BASES (continued)

SURVEILLANCE
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SR 3.5.1.8 (continued)

Note which identifies that the associated ECCS actuation instrumentation is not required to be response time tested. This is supported by Reference 15.

Response time testing of the remaining subsystem components is required. However, of the remaining subsystem components, the time for each ECCS pump to reach rated speed is not directly measured in the response time tests. The time(s) for the ECCS pumps to reach rated speed is bounded, in all cases, by the time(s) for the ECCS injection valve(s) to reach the full-open position. Plant-specific calculations show that all ECCS motor start times at rated voltage are less than two seconds. In addition, these calculations show that under degraded voltage conditions, the time to rated speed is less than five seconds.

ECCS RESPONSE TIME tests are conducted every 18 months. The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown that these components usually pass the SR when performed at the 18 month Frequency, which is based on the refueling cycle. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

With regard to ECCS RESPONSE TIME values obtained pursuant to this SR, as read from plant indication instrumentation, the specified limit is considered to be a nominal value and therefore does not require compensation for instrument indication uncertainties (Ref. 20).

BASES (continued)

- REFERENCES
1. USAR, Section 6.3.2.2.3.
 2. USAR, Section 6.3.2.2.4.
 3. USAR, Section 6.3.2.2.1.
 4. USAR, Section 6.3.2.2.2.
 5. USAR, Section 15.2.8.
 6. USAR, Section 15.6.4.
 7. USAR, Section 15.6.5.
 8. 10 CFR 50, Appendix K.
 9. USAR, Section 6.3.3.
 10. 10 CFR 50.46.
 11. USAR, Section 6.3.3.3.
 12. Memorandum from R.L. Baer (NRC) to V. Stello, Jr. (NRC), "Recommended Interim Revisions to LCO's for ECCS Components," December 1, 1975.
 13. USAR, Table 6.3-8.
 14. USAR, Section 7.3.1.1.1.4.
 15. NEDO-32291-A, "System Analyses for Elimination of Selected Response Time Testing Requirements," January 1994.
 16. Calculation IP-0-0044.
 17. Calculations 01HP09/10/11, IP-C-0042.
 18. Calculations 01LP08/11/14, IP-C-0043.
 19. Calculations 01RH19/20/22/24/25, IP-C-0041.
 20. Calculation IP-0-0024.
 21. ASME/ANSI OM-1987, Operation and Maintenance of Nuclear Power Plants, Part 1.
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BASES

ACTIONS

B.1 and B.2 (continued)

power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE
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SR 3.6.1.6.1

~~A manual actuation of each LLS valve is performed to verify that the valve and solenoids are functioning properly. If this testing is performed using reactor steam, adequate reactor steam pressure must be available to perform this test to avoid damaging the valve. Also, adequate steam flow must be passing through the main turbine or turbine bypass valves to continue to control reactor pressure when the LLS valves divert steam flow upon opening. Sufficient time is therefore allowed after the required pressure and flow are achieved to perform this test. Adequate pressure at which this test is to be performed is consistent with the pressure recommended by the valve manufacturer. Plant startup is allowed prior to performing this test because valve OPERABILITY and the setpoints for overpressure protection are verified by Reference 2 prior to valve installation.~~

~~Therefore, this SR is modified by a Note that states the Surveillance is not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. The 12 hours allowed for manual actuation after the required pressure and flow are reached is sufficient to achieve stable conditions for testing and provides a reasonable time to complete the SR.~~

~~Alternatively, the S/RV(s) may be manually actuated without reactor steam provided measures are taken to preclude damage to the S/RV upon reclosure.~~

A manual actuation of each required LLS valve (those valves removed and replaced to satisfy SR 3.4.4.1) is performed to verify that the valve is functioning properly. This SR can be demonstrated by one of two methods. If performed by Method 1, plant startup is allowed prior to performing this test because valve OPERABILITY and the setpoints for overpressure protection are verified, per ASME requirements (Ref. 2), prior to valve installation. Therefore, this SR is modified by a Note that states the Surveillance is not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. The 12 hours allowed for manual actuation after the required pressure is reached is sufficient to achieve stable conditions for testing and provides a reasonable time to complete the SR. If performed by Method 2, valve OPERABILITY has been demonstrated for all installed LLS valves based upon the successful operation of a test sample of S/RVs.

1. Manual actuation of the LLS valve, with verification of the response of the turbine control valves or bypass

valves, by a change in the measured steam flow, or any other method suitable to verify steam flow (e.g., tailpipe temperature or acoustic monitoring). Adequate reactor steam pressure must be available to perform this test to avoid damaging the valve. Also, adequate steam flow must be passing through the main turbine or turbine bypass valves to continue to control reactor pressure when the LLS valves divert steam flow upon opening. Sufficient time is therefore allowed after the required pressure and flow are achieved to perform this test. Adequate pressure at which this test is to be performed is consistent with the pressure recommended by the valve manufacturer.

2. The sample population of S/RVs tested to satisfy SR 3.4.4.1 will also be stroked in the relief mode during "as-found" testing to verify proper operation of the S/RV. The successful performance of the test sample of S/RVs provides reasonable assurance that all LLS valves will perform in similar fashion. After the S/RVs are replaced, the relief-mode actuator of the newly-installed S/RVs will be uncoupled from the S/RV stem, and cycled to ensure that no damage has occurred to the S/RV during transportation and installation. Following cycling, the relief-mode actuator is recoupled and the proper positioning of the stem nut is independently verified. This verifies that each replaced S/RV will properly perform its intended function.

The 18 month Frequency was developed based on the S/RV tests required by the ASME Boiler and Pressure Vessel Code, Section XI (Ref. 3). Operating experience has shown these components usually pass the Surveillance when performed at the 18 month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

~~The Frequency of 18 months on a STAGGERED TEST BASIS ensures that each solenoid for each S/RV is alternately tested. The 18 month Frequency was developed based on the S/RV tests required by the ASME Boiler and Pressure Vessel Code, Section XI (Ref. 2). Operating experience has shown these components usually pass the Surveillance when performed at the 18 month Staggered Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.~~

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SURVEILLANCE
REQUIREMENTS
(continued)

SR 3.6.1.6.2

The LLS designed S/RVs are required to actuate automatically upon receipt of specific initiation signals. A system functional test is performed to verify that the mechanical portions (i.e., solenoids) of the automatic LLS function operate as designed when initiated either by an actual or simulated automatic initiation signal. The LOGIC SYSTEM FUNCTIONAL TEST in SR 3.3.6.5.4 overlaps this SR to provide complete testing of the safety function.

The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown these components usually pass the Surveillance when performed at the 18 month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

This SR is modified by a Note that excludes valve actuation. This prevents a reactor pressure vessel pressure blowdown.

REFERENCES

1. USAR, Section 5.2.2.2.3.
 2. ~~ASME, Boiler and Pressure Vessel Code, Section XI.~~
ASME/ANSI OM-1987, Operation and Maintenance of Nuclear Power Plants, Part 1.
 3. ASME, Boiler and Pressure Vessel Code, Section XI.
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