ENCLOSURE 5 TAB

Enclosure 5

Edwin I. Hatch Nuclear Plant
Request to Revise Technical Specifications:
Quarterly Surveillance Extension

Bases for Change Request for Reduced Intervals

This proposed Technical Specifications change requests no reductions in Surveillance Requirement intervals.

ENCLOSURE 6 TAB

Enclosure 6

Edwin I. Hatch Nuclear Plant
Request to Revise Technical Specifications:
Quarterly Surveillance Extension

10 CFR 50.92 Significant Hazards Evaluation and Environmental Assessment

A. 10 CFR 50.92 Significant Hazards Evaluation

The standards used to arrive at a determination that a request for amendment does not involve a significant hazards consideration are included in 10 CFR 50.92, which states that operation of the facility in accordance with the proposed amendment would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated; or

2. Create the possibility of a new or different kind of accident from any accident previously evaluated; or

3. Involve a significant reduction in a margin of safety.

Southern Nuclear Operating Company has reviewed the proposed amendment with respect to these three factors, and determined that the proposed change does not involve a significant hazard based upon the following:

1. *The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.*

   The proposed Technical Specifications (TS) change involves an increase in the surveillance testing intervals for various Surveillance Requirements (SRs) from 92 days to 92 days on a STAGGERED TEST BASIS.. The proposed TS changes do not physically impact the plant, nor do they impact any design or functional requirements of the associated systems. That is, the proposed TS change does not degrade the performance of, or increase the challenges to, any safety systems assumed to function in the safety analysis. The proposed TS changes neither impact the TS SRs themselves nor the way in which the surveillances are performed. In addition, the proposed TS change does not introduce any accident initiators, since no accidents previously evaluated relate to the frequency of surveillance testing. Also, evaluation of the proposed TS change demonstrates that the availability of equipment and systems required to prevent or mitigate the radiological consequences of an accident are not significantly affected because of other, more frequent testing that is performed, the availability of redundant systems and equipment, or the high reliability of the equipment. Since the impact on the systems is minimal, it is concluded that the overall impact on the plant safety analysis is negligible.

   A sensitivity analysis was performed to determine the effect of the increased surveillance intervals on the HNP Probabilistic Risk Assessment (PRA). This sensitivity analysis shows a negligible increase in core damage frequency (CDF) and

essentially no change in large early release frequency (LERF) due to the proposed change.

Furthermore, an historical review of surveillance test results and associated maintenance records indicates there is no evidence of any failure that would invalidate the above conclusions. Therefore, the proposed TS change does not significantly increase the probability or consequences of an accident previously evaluated.

2. *The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.*

The proposed TS change involves a change in the various SR intervals from 92 days to 92 days on a STAGGERED TEST BASIS. The proposed TS change does not introduce any failure mechanisms of a different type than those previously evaluated, since no physical changes to the plant are being made. Also, no new or different equipment is being installed, and no installed equipment is being operated in a different manner. As a result, no new failure modes are introduced. In addition, the surveillance test requirements themselves, and the way surveillance tests are performed, remain unchanged.

Furthermore, an historical review of surveillance test results and associated maintenance records indicates there is no evidence of any failure that would invalidate the above conclusions. Therefore, the proposed TS change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. *The proposed amendment will not involve a significant reduction in a margin of safety.*

Although the proposed TS change results in changes to the interval between surveillance tests, the impact, if any, on system availability is minimal, based upon other, more frequent testing that is performed, the existence of redundant systems and equipment, or overall system reliability. Evaluations show there is no evidence of time-dependent failures that would impact the availability of the systems. The proposed change does not significantly impact the condition or performance of structures, systems, and components relied upon for accident mitigation.

A sensitivity analysis was performed to determine the effect of the increased surveillance intervals on the HNP PRA. This sensitivity analysis shows a negligible increase in CDF and essentially no change in LERF due to the proposed change.

Furthermore, an historical review of surveillance test results and associated maintenance records indicates there was no evidence of any failure that would

invalidate the above conclusions. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

B. Environmental Assessment

The proposed TS changes were reviewed for environmental considerations against the criteria set forth in 10 CFR 51.22. Based upon the results of this review, Southern Nuclear Operating Company has determined that the proposed TS change revises a requirement with respect to the installation or use of a facility component located within the restricted area, as defined in 10 CFR 20 or revises an inspection or SR. However, the proposed TS change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) as follows:

1. The amendment involves no significant hazards consideration.

2. There is no significant change in the types or significant increase in the amounts of any effluent that may be released offsite.

3. A significant increase in individual or cumulative occupational radiation exposure.

Therefore, pursuant to 10 CFR 51.22(b), an environmental assessment of the proposed TS amendment is not required.

ENCLOSURE 7 TAB

UNIT 1 TAB

Enclosure 7

Edwin I. Hatch Nuclear Plant
Request to Revise Technical Specifications:
Quarterly Surveillance Extension

Technical Specifications Page Change Instructions

Unit 1

Page	Instruction
3.3-5	Replace
3.3-17	Replace
3.3-21	Replace
3.3-28	Replace
3.3-32	Replace
3.3-40	Replace
3.3-49	Replace
3.3-54	Replace
3.3-61	Replace
3.3-64	Replace
3.3-65	Replace
3.3-68	Replace

SURVEILLANCE REQUIREMENTS (continued)

	SURVEILLANCE	FREQUENCY
SR 3.3.1.1.7	----------NOTE---------- Only required to be met during entry into MODE 2 from MODE 1. ---------- Verify the IRM and APRM channels overlap.	7 days
SR 3.3.1.1.8	Calibrate the local power range monitors.	1000 effective full power hours
SR 3.3.1.1.9	Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.1.1.10	----------NOTE---------- For Function 2.a, not required to be performed when entering MODE 2 from MODE 1 until 12 hours after entering MODE 2. ---------- Perform CHANNEL FUNCTIONAL TEST.	184 days
SR 3.3.1.1.11	Verify Turbine Stop Valve — Closure and Turbine Control Valve Fast Closure, Trip Oil Pressure — Low Functions are not bypassed when THERMAL POWER is $\geq$ 28% RTP.	184 days
SR 3.3.1.1.12	Perform CHANNEL FUNCTIONAL TEST.	18 months

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.3.2.1.2	----------NOTE---------- Not required to be performed until 1 hour after any control rod is withdrawn at < 10% RTP in MODE 2. ---------- Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.2.1.3	----------NOTE---------- Not required to be performed until 1 hour after THERMAL POWER is < 10% RTP in MODE 1. ---------- Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.2.1.4	----------NOTE---------- Neutron detectors are excluded. ---------- Verify the RBM: a. Low Power Range — Upscale Function is not bypassed when THERMAL POWER is ≥ 29% and < 64% RTP. b. Intermediate Power Range — Upscale Function is not bypassed when THERMAL POWER is ≥ 64% and < 84% RTP. c. High Power Range — Upscale Function is not bypassed when THERMAL POWER is ≥ 84% RTP.	18 months

(continued)

SURVEILLANCE REQUIREMENTS

----------NOTE----------
When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours provided feedwater and main turbine high water level trip capability is maintained.

SURVEILLANCE		FREQUENCY
SR 3.3.2.2.1	Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.2.2.2	Perform CHANNEL CALIBRATION. The Allowable Value shall be $\leq$ 56.5 inches.	18 months
SR 3.3.2.2.3	Perform LOGIC SYSTEM FUNCTIONAL TEST including valve actuation.	18 months

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. One or more Functions with EOC-RPT trip capability not maintained. AND MCPR limit for inoperable EOC-RPT not made applicable.	B.1 Restore EOC-RPT trip capability. OR B.2 Apply the MCPR limit for inoperable EOC-RPT as specified in the COLR.	2 hours 2 hours
C. Required Action and associated Completion Time not met.	C.1 Remove the associated recirculation pump from service. OR C.2 Reduce THERMAL POWER to < 28% RTP.	4 hours 4 hours

SURVEILLANCE REQUIREMENTS

----------NOTE----------
When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours provided the associated Function maintains EOC-RPT trip capability.

SURVEILLANCE	FREQUENCY
SR 3.3.4.1.1 Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.3.4.2.2	Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.4.2.3	Perform CHANNEL CALIBRATION. The Allowable Values shall be: a. Reactor Vessel Water Level — ATWS-RPT Level: $\geq$ -73 inches; and b. Reactor Steam Dome Pressure — High: $\leq$ 1175 psig.	18 months
SR 3.3.4.2.4	Perform LOGIC SYSTEM FUNCTIONAL TEST including breaker actuation.	18 months

SURVEILLANCE REQUIREMENTS

----------NOTES----------

1. Refer to Table 3.3.5.1-1 to determine which SRs apply for each ECCS Function.

2. 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 as follows: (a) for up to 6 hours for Functions 3.c and 3.f; and (b) for up to 6 hours for Functions other than 3.c and 3.f provided the associated Function or the redundant Function maintains initiation capability.

SURVEILLANCE		FREQUENCY
SR 3.3.5.1.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.5.1.2	Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.5.1.3	Perform CHANNEL CALIBRATION.	92 days
SR 3.3.5.1.4	Perform CHANNEL CALIBRATION.	18 months
SR 3.3.5.1.5	Perform LOGIC SYSTEM FUNCTIONAL TEST.	18 months

SURVEILLANCE REQUIREMENTS

----------NOTES----------

1. Refer to Table 3.3.5.2-1 to determine which SRs apply for each RCIC Function.

2. 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 as follows: (a) for up to 6 hours for Function 2; and (b) for up to 6 hours for Functions 1, 3, and 4 provided the associated Function maintains RCIC initiation capability.

SURVEILLANCE		FREQUENCY
SR 3.3.5.2.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.5.2.2	Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.5.2.3	Perform CHANNEL CALIBRATION.	92 days
SR 3.3.5.2.4	Perform CHANNEL CALIBRATION.	18 months
SR 3.3.5.2.5	Perform LOGIC SYSTEM FUNCTIONAL TEST.	18 months

SURVEILLANCE REQUIREMENTS

----------NOTES----------

1. Refer to Table 3.3.6.1-1 to determine which SRs apply for each Primary Containment Isolation Function.

2. 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 isolation capability.

SURVEILLANCE		FREQUENCY
SR 3.3.6.1.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.6.1.2	Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.6.1.3	Perform CHANNEL CALIBRATION.	92 days on a STAGGERED TEST BASIS
SR 3.3.6.1.4	Perform CHANNEL FUNCTIONAL TEST.	184 days
SR 3.3.6.1.5	Perform CHANNEL CALIBRATION.	18 months
SR 3.3.6.1.6	Perform LOGIC SYSTEM FUNCTIONAL TEST.	18 months

SURVEILLANCE REQUIREMENTS

----------NOTES----------

1. Refer to Table 3.3.6.2-1 to determine which SRs apply for each Secondary Containment Isolation Function.

2. 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 isolation capability.

SURVEILLANCE		FREQUENCY
SR 3.3.6.2.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.6.2.2	Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.6.2.3	Perform CHANNEL CALIBRATION.	92 days on a STAGGERED TEST BASIS
SR 3.3.6.2.4	Perform CHANNEL CALIBRATION.	18 months
SR 3.3.6.2.5	Perform LOGIC SYSTEM FUNCTIONAL TEST.	18 months

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action and associated Completion Time of Condition A, B, or C not met. OR Two or more LLS valves with initiation capability not maintained.	D.1 Declare the associated LLS valve(s) inoperable.	Immediately

SURVEILLANCE REQUIREMENTS

----------NOTES----------

1. Refer to Table 3.3.6.3-1 to determine which SRs apply for each Function.

2. 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 LLS initiation capability is maintained.

SURVEILLANCE		FREQUENCY
SR 3.3.6.3.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.6.3.2	Perform CHANNEL FUNCTIONAL TEST for portion of the channel outside primary containment.	92 days on a STAGGERED TEST BASIS

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.3.6.3.3	----------NOTE---------- Only required to be performed prior to entering MODE 2 during each scheduled outage > 72 hours when entry is made into primary containment. ---------- Perform CHANNEL FUNCTIONAL TEST for portions of the channel inside primary containment.	92 days on a STAGGERED TEST BASIS
SR 3.3.6.3.4	Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.6.3.5	Perform CHANNEL CALIBRATION.	18 months
SR 3.3.6.3.6	Perform LOGIC SYSTEM FUNCTIONAL TEST.	18 months

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. Required Action and associated Completion Time not met.	B.1 Place the associated MCREC subsystem(s) in the pressurization mode of operation. OR B.2 Declare associated MCREC subsystem(s) inoperable.	1 hour 1 hour

SURVEILLANCE REQUIREMENTS

----------NOTE----------
When a Control Room Air Inlet Radiation—High 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 other channel is OPERABLE.

SURVEILLANCE		FREQUENCY
SR 3.3.7.1.1	Perform CHANNEL CHECK.	24 hours
SR 3.3.7.1.2	Perform CHANNEL FUNCTIONAL TEST.	31 days
SR 3.3.7.1.3	Perform CHANNEL CALIBRATION. The Allowable Value shall be $\leq$ 1 mr/hour.	92 days on a STAGGERED TEST BASIS
SR 3.3.7.1.4	Perform LOGIC SYSTEM FUNCTIONAL TEST.	18 months

UNIT 2 TAB

Enclosure 7
Request to Revise Technical Specifications:
Quarterly Surveillance Extension
Technical Specifications Page Change Instructions

Unit 2

Page	Instruction
3.3-5	Replace
3.3-18	Replace
3.3-22	Replace
3.3-29	Replace
3.3-33	Replace
3.3-41	Replace
3.3-50	Replace
3.3-55	Replace
3.3-55a	Add
3.3-55b	Add
3.3-62	Replace
3.3-65	Replace
3.3-66	Replace
3.3-69	Replace

SURVEILLANCE REQUIREMENTS (continued)

	SURVEILLANCE	FREQUENCY
SR 3.3.1.1.7	----------NOTE---------- Only required to be met during entry into MODE 2 from MODE 1. ---------- Verify the IRM and APRM channels overlap.	7 days
SR 3.3.1.1.8	Calibrate the local power range monitors.	1000 effective full power hours
SR 3.3.1.1.9	Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.1.1.10	----------NOTE---------- For Function 2.a, not required to be performed when entering MODE 2 from MODE 1 until 12 hours after entering MODE 2. ---------- Perform CHANNEL FUNCTIONAL TEST.	184 days
SR 3.3.1.1.11	Verify Turbine Stop Valve — Closure and Turbine Control Valve Fast Closure, Trip Oil Pressure — Low Functions are not bypassed when THERMAL POWER is $\geq$ 28% RTP.	18 months
SR 3.3.1.1.12	Perform CHANNEL FUNCTIONAL TEST.	18 months

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.3.2.1.2	----------NOTE---------- Not required to be performed until 1 hour after any control rod is withdrawn at < 10% RTP in MODE 2. ---------- Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.2.1.3	----------NOTE---------- Not required to be performed until 1 hour after THERMAL POWER is < 10% RTP in MODE 1. ---------- Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.2.1.4	----------NOTE---------- Neutron detectors are excluded. ---------- Verify the RBM: a. Low Power Range — Upscale Function is not bypassed when THERMAL POWER is ≥ 29% and < 64% RTP. b. Intermediate Power Range — Upscale Function is not bypassed when THERMAL POWER is ≥ 64% and < 84% RTP. c. High Power Range — Upscale Function is not bypassed when THERMAL POWER is ≥ 84% RTP.	18 months

(continued)

SURVEILLANCE REQUIREMENTS

----------NOTE----------
When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours provided feedwater and main turbine high water level trip capability is maintained.

SURVEILLANCE		FREQUENCY
SR 3.3.2.2.1	Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.2.2.2	Perform CHANNEL CALIBRATION. The Allowable Value shall be $\leq$ 55.5 inches.	18 months
SR 3.3.2.2.3	Perform LOGIC SYSTEM FUNCTIONAL TEST including valve actuation.	18 months

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. One or more Functions with EOC-RPT trip capability not maintained. AND MCPR limit for inoperable EOC-RPT not made applicable.	B.1 Restore EOC-RPT trip capability. OR B.2 Apply the MCPR limit for inoperable EOC-RPT as specified in the COLR.	2 hours 2 hours
C. Required Action and associated Completion Time not met.	C.1 Remove the associated recirculation pump from service. OR C.2 Reduce THERMAL POWER to < 28% RTP.	4 hours 4 hours

SURVEILLANCE REQUIREMENTS

----------NOTE----------
When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours provided the associated Function maintains EOC-RPT trip capability.

SURVEILLANCE	FREQUENCY
SR 3.3.4.1.1 Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.3.4.2.2	Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.4.2.3	Perform CHANNEL CALIBRATION. The Allowable Values shall be: a. Reactor Vessel Water Level — ATWS-RPT Level: $\geq$ -73 inches; and b. Reactor Steam Dome Pressure — High: $\leq$ 1175 psig.	18 months
SR 3.3.4.2.4	Perform LOGIC SYSTEM FUNCTIONAL TEST including breaker actuation.	18 months

SURVEILLANCE REQUIREMENTS

----------NOTES----------

1. Refer to Table 3.3.5.1-1 to determine which SRs apply for each ECCS Function.

2. 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 as follows: (a) for up to 6 hours for Functions 3.c and 3.f; and (b) for up to 6 hours for Functions other than 3.c and 3.f provided the associated Function or the redundant Function maintains initiation capability.

SURVEILLANCE		FREQUENCY
SR 3.3.5.1.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.5.1.2	Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.5.1.3	Perform CHANNEL CALIBRATION.	92 days
SR 3.3.5.1.4	Perform CHANNEL CALIBRATION.	18 months
SR 3.3.5.1.5	Perform LOGIC SYSTEM FUNCTIONAL TEST.	18 months

SURVEILLANCE REQUIREMENTS

----------NOTES----------

1. Refer to Table 3.3.5.2-1 to determine which SRs apply for each RCIC Function.

2. 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 as follows: (a) for up to 6 hours for Function 2; and (b) for up to 6 hours for Functions 1, 3, and 4 provided the associated Function maintains RCIC initiation capability.

SURVEILLANCE		FREQUENCY
SR 3.3.5.2.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.5.2.2	Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.5.2.3	Perform CHANNEL CALIBRATION.	92 days
SR 3.3.5.2.4	Perform CHANNEL CALIBRATION.	18 months
SR 3.3.5.2.5	Perform LOGIC SYSTEM FUNCTIONAL TEST.	18 months

SURVEILLANCE REQUIREMENTS

----------NOTES----------

1. Refer to Table 3.3.6.1-1 to determine which SRs apply for each Primary Containment Isolation Function.

2. 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 isolation capability.

SURVEILLANCE		FREQUENCY
SR 3.3.6.1.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.6.1.2	Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.6.1.3	Perform CHANNEL CALIBRATION.	92 days on a STAGGERED TEST BASIS
SR 3.3.6.1.4	Perform CHANNEL FUNCTIONAL TEST.	184 days
SR 3.3.6.1.5	Perform CHANNEL CALIBRATION.	18 months
SR 3.3.6.1.6	Perform LOGIC SYSTEM FUNCTIONAL TEST.	18 months

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.3.6.1.7	----------NOTE---------- Channel sensors are excluded. ----------	
	Verify the ISOLATION SYSTEM RESPONSE TIME is within limits.	18 months on a STAGGERED TEST BASIS

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SURVEILLANCE REQUIREMENTS

----------NOTES----------

1. Refer to Table 3.3.6.2-1 to determine which SRs apply for each Secondary Containment Isolation Function.

2. 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 isolation capability.

SURVEILLANCE		FREQUENCY
SR 3.3.6.2.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.6.2.2	Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.6.2.3	Perform CHANNEL CALIBRATION.	92 days on a STAGGERED TEST BASIS
SR 3.3.6.2.4	Perform CHANNEL CALIBRATION.	18 months
SR 3.3.6.2.5	Perform LOGIC SYSTEM FUNCTIONAL TEST.	18 months

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action and associated Completion Time of Condition A, B, or C not met. OR Two or more LLS valves with initiation capability not maintained.	D.1 Declare the associated LLS valve(s) inoperable.	Immediately

SURVEILLANCE REQUIREMENTS

----------NOTES----------

1. Refer to Table 3.3.6.3-1 to determine which SRs apply for each Function.

2. 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 LLS initiation capability is maintained.

SURVEILLANCE		FREQUENCY
SR 3.3.6.3.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.6.3.2	Perform CHANNEL FUNCTIONAL TEST for portion of the channel outside primary containment.	92 days on a STAGGERED TEST BASIS

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.3.6.3.3	----------NOTE---------- Only required to be performed prior to entering MODE 2 during each scheduled outage > 72 hours when entry is made into primary containment. ---------- Perform CHANNEL FUNCTIONAL TEST for portions of the channel inside primary containment.	92 days on a STAGGERED TEST BASIS
SR 3.3.6.3.4	Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.6.3.5	Perform CHANNEL CALIBRATION.	18 months
SR 3.3.6.3.6	Perform LOGIC SYSTEM FUNCTIONAL TEST.	18 months

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. Required Action and associated Completion Time not met.	B.1 Place the associated MCREC subsystem(s) in the pressurization mode of operation. OR B.2 Declare associated MCREC subsystem(s) inoperable.	1 hour 1 hour

SURVEILLANCE REQUIREMENTS

----------NOTE----------
When a Control Room Air Inlet Radiation—High 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 other channel is OPERABLE.

SURVEILLANCE		FREQUENCY
SR 3.3.7.1.1	Perform CHANNEL CHECK.	24 hours
SR 3.3.7.1.2	Perform CHANNEL FUNCTIONAL TEST.	31 days
SR 3.3.7.1.3	Perform CHANNEL CALIBRATION. The Allowable Value shall be $\leq$ 1 mr/hour.	92 days on a STAGGERED TEST BASIS
SR 3.3.7.1.4	Perform LOGIC SYSTEM FUNCTIONAL TEST.	18 months

ENCLOSURE 8 TAB

Enclosure 8
Edwin I. Hatch Nuclear Plant
Request to Revise Technical Specifications:
Quarterly Surveillance Extension

Marked-Up Technical Specifications Pages

UNIT 1 TAB

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.3.1.1.7	----------NOTE---------- Only required to be met during entry into MODE 2 from MODE 1. ---------- Verify the IRM and APRM channels overlap.	7 days
SR 3.3.1.1.8	Calibrate the local power range monitors.	1000 effective full power hours
SR 3.3.1.1.9	Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.1.1.10	----------NOTE---------- For Function 2.a, not required to be performed when entering MODE 2 from MODE 1 until 12 hours after entering MODE 2. ---------- Perform CHANNEL FUNCTIONAL TEST.	184 days
SR 3.3.1.1.11	Verify Turbine Stop Valve — Closure and Turbine Control Valve Fast Closure, Trip Oil Pressure — Low Functions are not bypassed when THERMAL POWER is ≥ 28% RTP.	184 days
SR 3.3.1.1.12	Perform CHANNEL FUNCTIONAL TEST.	18 months

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.3.2.1.2	----------NOTE---------- Not required to be performed until 1 hour after any control rod is withdrawn at < 10% RTP in MODE 2. ---------- Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.2.1.3	----------NOTE---------- Not required to be performed until 1 hour after THERMAL POWER is < 10% RTP in MODE 1. ---------- Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.2.1.4	----------NOTE---------- Neutron detectors are excluded. ---------- Verify the RBM: a. Low Power Range — Upscale Function is not bypassed when THERMAL POWER is ≥ 29% and < 64% RTP. b. Intermediate Power Range — Upscale Function is not bypassed when THERMAL POWER is ≥ 64% and < 84% RTP. c. High Power Range — Upscale Function is not bypassed when THERMAL POWER is ≥ 84% RTP.	18 months

(continued)

SURVEILLANCE REQUIREMENTS

----------NOTE----------
When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours provided feedwater and main turbine high water level trip capability is maintained.

SURVEILLANCE		FREQUENCY
SR 3.3.2.2.1	Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.2.2.2	Perform CHANNEL CALIBRATION. The Allowable Value shall be $\leq$ 56.5 inches.	18 months
SR 3.3.2.2.3	Perform LOGIC SYSTEM FUNCTIONAL TEST including valve actuation.	18 months

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
B. One or more Functions with EOC-RPT trip capability not maintained. AND MCPR limit for inoperable EOC-RPT not made applicable.	B.1	Restore EOC-RPT trip capability.	2 hours
	OR		
	B.2	Apply the MCPR limit for inoperable EOC-RPT as specified in the COLR.	2 hours
C. Required Action and associated Completion Time not met.	C.1	Remove the associated recirculation pump from service.	4 hours
	OR		
	C.2	Reduce THERMAL POWER to < 28% RTP.	4 hours

SURVEILLANCE REQUIREMENTS

----------NOTE----------
When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours provided the associated Function maintains EOC-RPT trip capability.

SURVEILLANCE		FREQUENCY
SR 3.3.4.1.1	Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.3.4.2.2	Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.4.2.3	Perform CHANNEL CALIBRATION. The Allowable Values shall be: a. Reactor Vessel Water Level — ATWS-RPT Level: ≥ -73 inches; and b. Reactor Steam Dome Pressure — High: ≤ 1175 psig.	18 months
SR 3.3.4.2.4	Perform LOGIC SYSTEM FUNCTIONAL TEST including breaker actuation.	18 months

SURVEILLANCE REQUIREMENTS

----------NOTES----------

1. Refer to Table 3.3.5.1-1 to determine which SRs apply for each ECCS Function.

2. 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 as follows: (a) for up to 6 hours for Functions 3.c and 3.f; and (b) for up to 6 hours for Functions other than 3.c and 3.f provided the associated Function or the redundant Function maintains initiation capability.

SURVEILLANCE		FREQUENCY
SR 3.3.5.1.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.5.1.2	Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.5.1.3	Perform CHANNEL CALIBRATION.	92 days
SR 3.3.5.1.4	Perform CHANNEL CALIBRATION.	18 months
SR 3.3.5.1.5	Perform LOGIC SYSTEM FUNCTIONAL TEST.	18 months

SURVEILLANCE REQUIREMENTS

----------NOTES----------

1. Refer to Table 3.3.5.2-1 to determine which SRs apply for each RCIC Function.

2. 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 as follows: (a) for up to 6 hours for Function 2; and (b) for up to 6 hours for Functions 1, 3, and 4 provided the associated Function maintains RCIC initiation capability.

SURVEILLANCE		FREQUENCY
SR 3.3.5.2.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.5.2.2	Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.5.2.3	Perform CHANNEL CALIBRATION.	92 days
SR 3.3.5.2.4	Perform CHANNEL CALIBRATION.	18 months
SR 3.3.5.2.5	Perform LOGIC SYSTEM FUNCTIONAL TEST.	18 months

SURVEILLANCE REQUIREMENTS

----------NOTES----------

1. Refer to Table 3.3.6.1-1 to determine which SRs apply for each Primary Containment Isolation Function.

2. 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 isolation capability.

SURVEILLANCE		FREQUENCY
SR 3.3.6.1.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.6.1.2	Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.6.1.3	Perform CHANNEL CALIBRATION.	92 days on a STAGGERED TEST BASIS
SR 3.3.6.1.4	Perform CHANNEL FUNCTIONAL TEST.	184 days
SR 3.3.6.1.5	Perform CHANNEL CALIBRATION.	18 months
SR 3.3.6.1.6	Perform LOGIC SYSTEM FUNCTIONAL TEST.	18 months

SURVEILLANCE REQUIREMENTS

----------NOTES----------

1. Refer to Table 3.3.6.2-1 to determine which SRs apply for each Secondary Containment Isolation Function.

2. 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 isolation capability.

SURVEILLANCE		FREQUENCY
SR 3.3.6.2.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.6.2.2	Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.6.2.3	Perform CHANNEL CALIBRATION.	92 days on a STAGGERED TEST BASIS
SR 3.3.6.2.4	Perform CHANNEL CALIBRATION.	18 months
SR 3.3.6.2.5	Perform LOGIC SYSTEM FUNCTIONAL TEST.	18 months

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action and associated Completion Time of Condition A, B, or C not met. OR Two or more LLS valves with initiation capability not maintained.	D.1 Declare the associated LLS valve(s) inoperable.	Immediately

SURVEILLANCE REQUIREMENTS

----------NOTES----------

1. Refer to Table 3.3.6.3-1 to determine which SRs apply for each Function.
2. 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 LLS initiation capability is maintained.

SURVEILLANCE		FREQUENCY
SR 3.3.6.3.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.6.3.2	Perform CHANNEL FUNCTIONAL TEST for portion of the channel outside primary containment.	92 days on a STAGGERED TEST BASIS

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.3.6.3.3	----------NOTE---------- Only required to be performed prior to entering MODE 2 during each scheduled outage > 72 hours when entry is made into primary containment. ---------- Perform CHANNEL FUNCTIONAL TEST for portions of the channel inside primary containment.	92 days on a STAGGERED TEST BASIS
SR 3.3.6.3.4	Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.6.3.5	Perform CHANNEL CALIBRATION.	18 months
SR 3.3.6.3.6	Perform LOGIC SYSTEM FUNCTIONAL TEST.	18 months

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
B. Required Action and associated Completion Time not met.	B.1	Place the associated MCREC subsystem(s) in the pressurization mode of operation.	1 hour
	OR		
	B.2	Declare associated MCREC subsystem(s) inoperable.	1 hour

SURVEILLANCE REQUIREMENTS

----------NOTE----------
When a Control Room Air Inlet Radiation—High 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 other channel is OPERABLE.

SURVEILLANCE		FREQUENCY
SR 3.3.7.1.1	Perform CHANNEL CHECK.	24 hours
SR 3.3.7.1.2	Perform CHANNEL FUNCTIONAL TEST.	31 days
SR 3.3.7.1.3	Perform CHANNEL CALIBRATION. The Allowable Value shall be ≤ 1 mr/hour.	92 days on a STAGGERED TEST BASIS
SR 3.3.7.1.4	Perform LOGIC SYSTEM FUNCTIONAL TEST.	18 months

UNIT 2 TAB

SURVEILLANCE REQUIREMENTS (continued)

	SURVEILLANCE	FREQUENCY
SR 3.3.1.1.7	----------NOTE---------- Only required to be met during entry into MODE 2 from MODE 1. ---------- Verify the IRM and APRM channels overlap.	7 days
SR 3.3.1.1.8	Calibrate the local power range monitors.	1000 effective full power hours
SR 3.3.1.1.9	Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.1.1.10	----------NOTE---------- For Function 2.a, not required to be performed when entering MODE 2 from MODE 1 until 12 hours after entering MODE 2. ---------- Perform CHANNEL FUNCTIONAL TEST.	184 days
SR 3.3.1.1.11	Verify Turbine Stop Valve — Closure and Turbine Control Valve Fast Closure, Trip Oil Pressure — Low Functions are not bypassed when THERMAL POWER is $\geq$ 28% RTP.	18 months
SR 3.3.1.1.12	Perform CHANNEL FUNCTIONAL TEST.	18 months

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.3.2.1.2	----------NOTE---------- Not required to be performed until 1 hour after any control rod is withdrawn at < 10% RTP in MODE 2. ---------- Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.2.1.3	----------NOTE---------- Not required to be performed until 1 hour after THERMAL POWER is < 10% RTP in MODE 1. ---------- Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.2.1.4	----------NOTE---------- Neutron detectors are excluded. ---------- Verify the RBM: a. Low Power Range — Upscale Function is not bypassed when THERMAL POWER is ≥ 29% and < 64% RTP. b. Intermediate Power Range — Upscale Function is not bypassed when THERMAL POWER is ≥ 64% and < 84% RTP. c. High Power Range — Upscale Function is not bypassed when THERMAL POWER is ≥ 84% RTP.	18 months

(continued)

SURVEILLANCE REQUIREMENTS

----------NOTE----------
When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours provided feedwater and main turbine high water level trip capability is maintained.

SURVEILLANCE		FREQUENCY
SR 3.3.2.2.1	Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.2.2.2	Perform CHANNEL CALIBRATION. The Allowable Value shall be ≤ 55.5 inches.	18 months
SR 3.3.2.2.3	Perform LOGIC SYSTEM FUNCTIONAL TEST including valve actuation.	18 months

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. One or more Functions with EOC-RPT trip capability not maintained. AND MCPR limit for inoperable EOC-RPT not made applicable.	B.1 Restore EOC-RPT trip capability. OR B.2 Apply the MCPR limit for inoperable EOC-RPT as specified in the COLR.	2 hours 2 hours
C. Required Action and associated Completion Time not met.	C.1 Remove the associated recirculation pump from service. OR C.2 Reduce THERMAL POWER to < 28% RTP.	4 hours 4 hours

SURVEILLANCE REQUIREMENTS

----------NOTE----------
When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours provided the associated Function maintains EOC-RPT trip capability.

SURVEILLANCE	FREQUENCY
SR 3.3.4.1.1 Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.3.4.2.2	Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.4.2.3	Perform CHANNEL CALIBRATION. The Allowable Values shall be: a. Reactor Vessel Water Level — ATWS-RPT Level: $\geq$ -73 inches; and b. Reactor Steam Dome Pressure — High: $\leq$ 1175 psig.	18 months
SR 3.3.4.2.4	Perform LOGIC SYSTEM FUNCTIONAL TEST including breaker actuation.	18 months

SURVEILLANCE REQUIREMENTS

----------NOTES----------

1. Refer to Table 3.3.5.1-1 to determine which SRs apply for each ECCS Function.

2. 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 as follows: (a) for up to 6 hours for Functions 3.c and 3.f; and (b) for up to 6 hours for Functions other than 3.c and 3.f provided the associated Function or the redundant Function maintains initiation capability.

SURVEILLANCE		FREQUENCY
SR 3.3.5.1.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.5.1.2	Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.5.1.3	Perform CHANNEL CALIBRATION.	92 days
SR 3.3.5.1.4	Perform CHANNEL CALIBRATION.	18 months
SR 3.3.5.1.5	Perform LOGIC SYSTEM FUNCTIONAL TEST.	18 months

SURVEILLANCE REQUIREMENTS

----------NOTES----------

1. Refer to Table 3.3.5.2-1 to determine which SRs apply for each RCIC Function.

2. 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 as follows: (a) for up to 6 hours for Function 2; and (b) for up to 6 hours for Functions 1, 3, and 4 provided the associated Function maintains RCIC initiation capability.

SURVEILLANCE		FREQUENCY
SR 3.3.5.2.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.5.2.2	Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.5.2.3	Perform CHANNEL CALIBRATION.	92 days
SR 3.3.5.2.4	Perform CHANNEL CALIBRATION.	18 months
SR 3.3.5.2.5	Perform LOGIC SYSTEM FUNCTIONAL TEST.	18 months

SURVEILLANCE REQUIREMENTS

----------NOTES----------

1. Refer to Table 3.3.6.1-1 to determine which SRs apply for each Primary Containment Isolation Function.

2. 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 isolation capability.

SURVEILLANCE		FREQUENCY
SR 3.3.6.1.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.6.1.2	Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.6.1.3	Perform CHANNEL CALIBRATION.	92 days on a STAGGERED TEST BASIS
SR 3.3.6.1.4	Perform CHANNEL FUNCTIONAL TEST.	184 days
SR 3.3.6.1.5	Perform CHANNEL CALIBRATION.	18 months
SR 3.3.6.1.6	Perform LOGIC SYSTEM FUNCTIONAL TEST.	18 months
SR 3.3.6.1.7	----------NOTE---------- Channel sensors are excluded. ---------- Verify the ISOLATION SYSTEM RESPONSE TIME is within limits.	18 months on a STAGGERED TEST BASIS

SURVEILLANCE REQUIREMENTS

----------NOTES----------

1. Refer to Table 3.3.6.2-1 to determine which SRs apply for each Secondary Containment Isolation Function.

2. 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 isolation capability.

SURVEILLANCE		FREQUENCY
SR 3.3.6.2.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.6.2.2	Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.6.2.3	Perform CHANNEL CALIBRATION.	92 days on a STAGGERED TEST BASIS
SR 3.3.6.2.4	Perform CHANNEL CALIBRATION.	18 months
SR 3.3.6.2.5	Perform LOGIC SYSTEM FUNCTIONAL TEST.	18 months

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action and associated Completion Time of Condition A, B, or C not met. OR Two or more LLS valves with initiation capability not maintained.	D.1 Declare the associated LLS valve(s) inoperable.	Immediately

SURVEILLANCE REQUIREMENTS

----------NOTES----------

1. Refer to Table 3.3.6.3-1 to determine which SRs apply for each Function.

2. 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 LLS initiation capability is maintained.

SURVEILLANCE		FREQUENCY
SR 3.3.6.3.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.6.3.2	Perform CHANNEL FUNCTIONAL TEST for portion of the channel outside primary containment.	92 days on a STAGGERED TEST BASIS

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.3.6.3.3	----------NOTE---------- Only required to be performed prior to entering MODE 2 during each scheduled outage > 72 hours when entry is made into primary containment. ---------- Perform CHANNEL FUNCTIONAL TEST for portions of the channel inside primary containment.	92 days on a STAGGERED TEST BASIS
SR 3.3.6.3.4	Perform CHANNEL FUNCTIONAL TEST.	92 days on a STAGGERED TEST BASIS
SR 3.3.6.3.5	Perform CHANNEL CALIBRATION.	18 months
SR 3.3.6.3.6	Perform LOGIC SYSTEM FUNCTIONAL TEST.	18 months

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. Required Action and associated Completion Time not met.	B.1 Place the associated MCREC subsystem(s) in the pressurization mode of operation. OR B.2 Declare associated MCREC subsystem(s) inoperable.	1 hour 1 hour

SURVEILLANCE REQUIREMENTS

---NOTE---
When a Control Room Air Inlet Radiation—High 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 other channel is OPERABLE.

SURVEILLANCE		FREQUENCY
SR 3.3.7.1.1	Perform CHANNEL CHECK.	24 hours
SR 3.3.7.1.2	Perform CHANNEL FUNCTIONAL TEST.	31 days
SR 3.3.7.1.3	Perform CHANNEL CALIBRATION. The Allowable Value shall be ≤ 1 mr/hour.	92 days on a STAGGERED TEST BASIS
SR 3.3.7.1.4	Perform LOGIC SYSTEM FUNCTIONAL TEST.	18 months

ENCLOSURE 9 TAB

UNIT 1 TAB

Enclosure 9

Edwin I. Hatch Nuclear Plant
Request to Revise Technical Specifications:
Quarterly Surveillance Extension

Bases Page Change Instructions

Unit 1

Page	Instruction
B 3.3-29	Replace
B 3.3-32b	Replace
B 3.3-50	Replace
B 3.3-53	Replace
B 3.3-59	Replace
B 3.3-60	Replace
B 3.3-86	Replace
B 3.3-89	Replace
B 3.3-97	Replace
B 3.3-98	Replace
B 3.3-134	Replace
B 3.3-135	Replace
B 3.3-145	Replace
B 3.3-146	Replace
B 3.3-174	Replace
B 3.3-175	Replace
B 3.3-184	Replace
B 3.3-185	Replace
B 3.3-186	Replace
B 3.3-193	Replace
B 3.3-195	Replace
B 3.3-201	Replace
B 3.3-202	Replace

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.1.1.9 and SR 3.3.1.1.12

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology. The 92 day on a STAGGERED TEST BASIS Frequency of SR 3.3.1.1.9 is based on a review of the surveillance test history, drift analysis of the associated trip units (if applicable), and Reference 18.

The 18 month Frequency of SR 3.3.1.1.12 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 Surveillance when performed at the 18 month Frequency. The 18 month Frequency for Table 3.3.1.1-1, Function 7.a, is based on Reference 18.

SR 3.3.1.1.10

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. For the APRM Functions, this test supplements the automatic self-test functions that operate continuously in the APRM and voter channels. The APRM CHANNEL FUNCTIONAL TEST covers the APRM channels (including recirculation flow processing — applicable to Function 2.b only), the two-out-of-four voter channels, and the interface connections to the RPS trip systems from the voter channels. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology. The 184 day Frequency of SR 3.3.1.1.10 is based on the reliability analysis of References 12 and 16. (NOTE: The actual voting logic of the two-out-of-four voter channels is tested as part of SR 3.3.1.1.15.)

For Function 2.a, a Note that requires this SR to be performed within 12 hours of entering MODE 2 from MODE 1 is provided. Testing of the MODE 2 APRM Function cannot be performed in MODE 1 without utilizing jumpers or lifted leads. This Note allows entry into MODE 2 from MODE 1 if the associated Frequency is not met per SR 3.0.2.

(continued)

BASES

REFERENCES (continued)

9. NEDO-30851-P-A , "Technical Specification Improvement Analyses for BWR Reactor Protection System," March 1988.

10. Technical Requirements Manual.

11. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

12. NEDC-32410P-A, "Nuclear Measurement Analysis and Control Power Range Neutron Monitor (NUMAC PRNM) Retrofit Plus Option III Stability Trip Function," October 1995.

13. NEDO-31960-A, "BWR Owners' Group Long-Term Stability Solutions Licensing Methodology," November 1995.

14. NEDO-31960-A, Supplement 1, "BWR Owners' Group Long-Term Stability Solutions Licensing Methodology," November 1995.

15. NEDO-32465-A, "BWR Owners' Group Long-Term Stability Detect and Suppress Solutions Licensing Basis Methodology and Reload Applications," March 1996.

16. NEDO-32410P-A, Supplement 1, "Nuclear Measurement Analysis and Control Power Range Neutron Monitor (NUMAC PRNM) Retrofit Plus Option III Stability Trip Function," November 1997.

17. Letter, L.A. England (BWROG) to M.J. Virgilio, "BWR Owners' Group Guidelines for Stability Interim Corrective Action," June 6, 1994.

18. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.2.1.1

A CHANNEL FUNCTIONAL TEST is performed for each RBM channel to ensure that the entire channel will perform the intended function. It includes the Reactor Manual Control System input.

Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology. The Frequency of 184 days is based on reliability analyses (Ref. 11).

SR 3.3.2.1.2 and SR 3.3.2.1.3

A CHANNEL FUNCTIONAL TEST is performed for the RWM to ensure that the entire system will perform the intended function. The CHANNEL FUNCTIONAL TEST for the RWM is performed by attempting to withdraw a control rod not in compliance with the prescribed sequence and verifying a control rod block occurs. This test is performed as soon as possible after the applicable conditions are entered. As noted in the SRs, SR 3.3.2.1.2 is not required to be performed until 1 hour after any control rod is withdrawn at < 10% RTP in MODE 2, and SR 3.3.2.1.3 is not required to be performed until 1 hour after THERMAL POWER is < 10% RTP in MODE 1. This allows entry into MODE 2 (and if entered during a shutdown, concurrent power reduction to < 10% RTP) for SR 3.3.2.1.2 and THERMAL POWER reduction to < 10% RTP in MODE 1 for SR 3.3.2.1.3 to perform the required Surveillances if the 92 day on a STAGGERED TEST BASIS Frequency is not met per SR 3.0.2. The 1 hour allowance is based on operating experience and in consideration of providing a reasonable time in which to complete the SRs. The 92 day on a STAGGERED TEST BASIS Frequency is based on a review of the surveillance test history and Reference 12.

SR 3.3.2.1.4

The RBM setpoints are automatically varied as a function of power. Three Allowable Values are specified in Table 3.3.2.1-1, each within a specific power range. The power at which the control rod block Allowable Values automatically change are based on the APRM signal's input to each RBM channel. Below the minimum power setpoint, the RBM is automatically bypassed. These power Allowable Values

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.2.1.8 (continued)

OPERABLE following loading of sequence into RWM, since this is when rod sequence input errors are possible.

REFERENCES

1. FSAR, Section 7.5.8.2.3.

2. FSAR, Section 7.2.2.4.

3. NEDC-30474-P, "Average Power Range Monitor, Rod Block Monitor, and Technical Specification Improvements (ARTS) Program for Edwin I. Hatch Nuclear Plants," December 1983.

4. NEDE-24011-P-A-US, "General Electrical Standard Application for Reload Fuel," Supplement for United States, (revision specified in the COLR).

5. Letter from T.A. Pickens (BWROG) to G.C. Lainas (NRC), "Amendment 17 to General Electric Licensing Topical Report NEDE-24011-P-A," BWROG-8644, August 15, 1986.

6. NEDO-21231, "Banked Position Withdrawal Sequence," January 1977.

7. NRC SER, "Acceptance of Referencing of Licensing Topical Report NEDE-24011-P-A," "General Electric Standard Application for Reactor Fuel, Revision 8, Amendment 17," December 27, 1987.

8. NEDC-30851-P-A, "Technical Specification Improvement Analysis for BWR Control Rod Block Instrumentation," October 1988.

9. GENE-770-06-1, "Bases For Changes To Surveillance Test Intervals and Allowed Out-Of-Service Times For Selected Instrumentation Technical Specifications," February 1991.

10. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

11. NEDC-32410P-A, "Nuclear Measurement Analysis and Control Power Range Neutron Monitor (NUMAC PRNM) Retrofit Plus Option III Stability Trip Function," October 1995.

12. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.2.2.1 (continued)

logic from the input of the alarm unit. This is consistent with the CHANNEL FUNCTIONAL TEST definition requiring the signal to be injected "as close to the sensor as practicable." Additionally, due to the physical location of the turbine trip relays and their close proximity to other sensitive equipment, accessibility is extremely limited. Verification of relay actuation and associated relay contact status by accessing the relay introduces a high potential for turbine trip and reactor scram. One contact from each turbine trip relay energizes an amber light indicating relay actuation. Therefore, it is acceptable to terminate the test at the turbine trip relay, utilizing light indication for relay status. These allowances are only acceptable if the CHANNEL CALIBRATION and the LOGIC SYSTEM FUNCTIONAL TEST overlap both the initiation and termination point of this CHANNEL FUNCTIONAL TEST such that the entire trip logic is tested.

The 92 day on a STAGGERED TEST BASIS Frequency is based on a review of the surveillance test history, drift analysis of the associated trip units, and Reference 4.

SR 3.3.2.2.2

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 range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations, consistent with the plant specific setpoint methodology.

The Frequency is based upon the assumption of an 18 month calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis.

SR 3.3.2.2.3

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required trip logic for a specific channel. The system functional test of the feedwater and main turbine valves is included as part of this Surveillance and overlaps the LOGIC SYSTEM FUNCTIONAL TEST to provide

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.2.2.3 (continued)

complete testing of the assumed safety function. Therefore, if a valve is incapable of operating, the associated instrumentation channels would also be inoperable. 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 Surveillance when performed at the 18 month Frequency.

REFERENCES

1. FSAR, Section 14.3.2.1.

2. GENE-770-06-1, "Bases for Changes to Surveillance Test Intervals and Allowed Out-Of-Service Times for Selected Instrumentation Technical Specifications," February 1991.

3. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

4. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS (continued)

analysis demonstrated that the 6 hour testing allowance does not significantly reduce the probability that the recirculation pumps will trip when necessary.

SR 3.3.4.1.1

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology.

The 92 day on a STAGGERED TEST BASIS Frequency is based on a review of the surveillance test history and Reference 7.

SR 3.3.4.1.2

This SR ensures that an EOC-RPT initiated from the TSV — Closure and TCV Fast Closure, Trip Oil Pressure — Low Functions will not be inadvertently bypassed when THERMAL POWER is ≥ 28% RTP. This involves calibration of the bypass channels. Adequate margins for the instrument setpoint methodologies are incorporated into the actual setpoint. Because main turbine bypass flow can affect this setpoint nonconservatively (THERMAL POWER is derived from first stage pressure) the main turbine bypass valves must remain closed during the calibration at THERMAL POWER ≥ 28% RTP to ensure that the calibration is valid. If any bypass channel's setpoint is nonconservative (i.e., the Functions are bypassed at ≥ 28% RTP, either due to open main turbine bypass valves or other reasons), the affected TSV — Closure and TCV Fast Closure, Trip Oil Pressure — Low Functions are considered inoperable. Alternatively, the bypass channel can be placed in the conservative condition (nonbypass). If placed in the nonbypass condition (Turbine Stop Valve—Closure and Turbine Control Valve Fast Closure, Trip Oil Pressure—Low Functions are enabled), this SR is met with the channel considered OPERABLE.

The Frequency of 184 days is based on engineering judgment and reliability of the components.

(continued)

BASES

REFERENCES (continued)

4. GENE-770-06-1, "Bases For Changes To Surveillance Test Intervals And Allowed Out-Of-Service Times For Selected Instrumentation Technical Specifications," February 1991.

5. Technical Requirements Manual.

6. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

7. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.4.2.1 (continued)

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

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

SR 3.3.4.2.2

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology.

The 92 day on a STAGGERED TEST BASIS Frequency is based on a review of the surveillance test history, drift analysis of the associated trip units, and Reference 4.

SR 3.3.4.2.3

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 range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations, consistent with the plant specific setpoint methodology.

The Frequency is based upon the assumption of an 18 month calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.4.2.4

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required trip logic for a specific channel. The system functional test of the pump breakers is included as part of this Surveillance and overlaps the LOGIC SYSTEM FUNCTIONAL TEST to provide complete testing of the assumed safety function. Therefore, if a breaker is incapable of operating, the associated instrument channel(s) would be inoperable.

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.

REFERENCES

1. FSAR, Section 7.23.

2. GENE-770-06-1, "Bases for Changes To Surveillance Test Intervals and Allowed Out-of-Service Times For Selected Instrumentation Technical Specifications," February 1991.

3. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

4. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.5.1.2

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology.

The 92 day on a STAGGERED TEST BASIS Frequency is based on a review of the surveillance test history, drift analysis of the associated trip units, and Reference 7.

SR 3.3.5.1.3 and SR 3.3.5.1.4

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 range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations, consistent with the plant specific setpoint methodology.

The Frequency of SR 3.3.5.1.3 and SR 3.3.5.1.4 is based upon the assumption of the magnitude of equipment drift in the setpoint analysis.

SR 3.3.5.1.5

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required initiation logic for a specific channel. The system functional testing performed in LCO 3.5.1, LCO 3.5.2, LCO 3.7.2, LCO 3.8.1, and LCO 3.8.2 overlaps this Surveillance to 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 Surveillance when performed at the 18 month Frequency.

(continued)

BASES (continued)

REFERENCES

1. FSAR, Section 4.8.

2. FSAR, Section 6.5.

3. FSAR, Chapter 14.4.

4. NEDC-31376-P, "Edwin I. Hatch Nuclear Power Plant, SAFER/GESTR-LOCA, Loss-of-Coolant Accident Analysis," December 1986.

5. NEDC-30936-P-A, "BWR Owners' Group Technical Specification Improvement Analyses for ECCS Actuation Instrumentation, Part 2," December 1988.

6. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

7. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.5.2.1 (continued)

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

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

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

SR 3.3.5.2.2

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology.

The 92 day on a STAGGERED TEST BASIS Frequency is based on a review of the surveillance test history, drift analysis of the associated trip units, and Reference 3.

SR 3.3.5.2.3 and SR 3.3.5.2.4

A CHANNEL CALIBRATION is a complete check of the instrument loop and the sensor. This test verifies the channel responds to the measured parameter within the necessary range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations, consistent with the plant specific setpoint methodology.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.5.2.3 and SR 3.3.5.2.4 (continued)

The Frequency of SR 3.3.5.2.3 and SR 3.3.5.2.4 is based upon the assumption of the magnitude of equipment drift in the setpoint analysis.

SR 3.3.5.2.5

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required initiation logic for a specific channel. The system functional testing performed in LCO 3.5.3 overlaps this Surveillance 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 that these components usually pass the Surveillance when performed at the 18 month Frequency.

REFERENCES

1. GENE-770-06-2, "Addendum to Bases for Changes to Surveillance Test Intervals and Allowed Out-of-Service Times for Selected Instrumentation Technical Specifications," February 1991.

2. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

3. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.6.1.2 and SR 3.3.6.1.4 (continued)

The 92 day on a STAGGERED TEST BASIS Frequency of SR 3.3.6.1.2 is based on a review of the surveillance test history, drift analysis of the associated trip units (if applicable), and Reference 7. The 184 day Frequency of SR 3.3.6.1.4 is based on engineering judgment and the reliability of the components (time delay relays exhibit minimal drift).

SR 3.3.6.1.3 and SR 3.3.6.1.5

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 range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations, consistent with the plant specific setpoint methodology.

The 92 day on a STAGGERED TEST BASIS Frequency of SR 3.3.6.1.3 is based on a review of the surveillance test history, drift analysis of the associated pressure (or vacuum) switches (if applicable), and Reference 7. The Frequency of SR 3.3.6.1.5 is based on the assumption of the magnitude of equipment drift in the setpoint analysis.

SR 3.3.6.1.6

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required isolation logic for a specific channel. The system functional testing performed on PCIVs in LCO 3.6.1.3 overlaps 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 these components usually pass the Surveillance when performed at the 18 month Frequency.

(continued)

BASES (continued)

REFERENCES

1. FSAR, Section 5.2.

2. FSAR, Chapter 14.

3. FSAR, Section 3.8.3.

4. NEDC-31677P-A, "Technical Specification Improvement Analysis for BWR Isolation Actuation Instrumentation," July 1990.

5. NEDC-30851P-A Supplement 2, "Technical Specifications Improvement Analysis for BWR Isolation Instrumentation Common to RPS and ECCS Instrumentation," March 1989.

6. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

7. NRC Safety Analysis Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS (continued)

average time required to perform channel surveillance. That analysis demonstrated the 6 hour testing allowance does not significantly reduce the probability that the SCIVs will isolate the associated penetration flow paths and that the SGT System will initiate when necessary.

SR 3.3.6.2.1

Performance of the CHANNEL CHECK once every 12 hours ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the instrument channels could be an indication of excessive instrument drift in one of the channels or something even more serious. A CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying the instrumentation continues to operate properly between each CHANNEL CALIBRATION.

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

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

SR 3.3.6.2.2

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology.

The 92 day on a STAGGERED TEST BASIS Frequency is based on a review of the surveillance test history, drift analysis of the associated trip units, and Reference 8.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.6.2.3 and SR 3.3.6.2.4

A CHANNEL CALIBRATION is a complete check of the instrument loop and the sensor. This test verifies the channel responds to the measured parameter within the necessary range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations, consistent with the plant specific setpoint methodology.

The 92 day on a STAGGERED TEST BASIS Frequency of SR 3.3.6.2.3 is based on a review of the surveillance test history and Reference 8. The Frequency of SR 3.3.6.2.4 is based on the assumption of the magnitude of equipment drift in the setpoint analysis.

SR 3.3.6.2.5

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required isolation logic for a specific channel. The system functional testing performed on SCIVs and the SGT System in LCO 3.6.4.2 and LCO 3.6.4.3, respectively, overlaps this Surveillance to provide complete testing of the assumed safety function.

While this Surveillance can be performed with the reactor at power for some of the Functions, operating experience has shown that these components usually pass the Surveillance when performed at the 18 month Frequency. Therefore, the Frequency was found to be acceptable from a reliability standpoint.

REFERENCES

1. FSAR, Section 5.2.
2. FSAR, Chapter 14.4.
3. FSAR, Sections 14.4.5 and 14.5.4.
4. FSAR, Sections 14.4.3, 14.4.4, 14.5.2, and 14.5.3.
5. NEDC-31677P-A, "Technical Specification Improvement Analysis for BWR Isolation Actuation Instrumentation," July 1990.

(continued)

BASES

REFERENCES (continued)

6. NEDC-30851P-A Supplement 2, "Technical Specifications Improvement Analysis for BWR Isolation Instrumentation Common to RPS and ECCS Instrumentation," March 1989.

7. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

8. NRC Safety Analysis Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS (continued)

time required to perform channel surveillance. That analysis demonstrated that the 6 hour testing allowance does not significantly reduce the probability that the LLS valves will initiate when necessary.

SR 3.3.6.3.1

Performance of the CHANNEL CHECK once every 12 hours ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on another channel. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the instrument channels could be an indication of excessive instrument drift in one of the channels or something even more serious. A CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying the instrumentation continues to operate properly between each CHANNEL CALIBRATION.

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

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

SR 3.3.6.3.2, SR 3.3.6.3.3, and SR 3.3.6.3.4

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology.

The 92 day on a STAGGERED TEST BASIS Frequency is based on a review of the surveillance test history, drift analysis of the associated trip units (if applicable), and Reference 5.

(continued)

BASES (continued)

REFERENCES

1. FSAR, Section 7.19.

2. FSAR, Section 4.11.

3. GENE-770-06-1, "Bases for Changes to Surveillance Test Intervals and Allowed Out-of-Service Times for Selected Instrumentation Technical Specifications," February 1991.

4. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

5. NRC Safety Evaluation Report for Amendment ___.

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.7.1.1 (continued)

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

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

SR 3.3.7.1.2

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire 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 31 days is based on operating experience with regard to channel OPERABILITY and drift, which demonstrates that failure of more than one channel in any 31 day interval is a rare event.

SR 3.3.7.1.3

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 range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations, consistent with the plant specific setpoint methodology.

The 92 day on a STAGGERED TEST BASIS Frequency is based on a review of the surveillance test history and Reference 8.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.7.1.4

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required initiation logic for a specific channel. The system functional testing performed in LCO 3.7.4, "Main Control Room Environmental Control (MCREC) System," overlaps this Surveillance to provide complete testing of the assumed safety function.

While this Surveillance can be 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 found to be acceptable from a reliability standpoint.

REFERENCES

1. Unit 2 FSAR, Section 7.3.5
2. FSAR, Section 5.2.
3. Unit 2 FSAR, Section 6.4.1.2.2.
4. FSAR, Chapter 14.
5. Unit 2 FSAR, Table 15.1.28.
6. GENE-770-06-1, "Bases for Changes to Surveillance Test Intervals and Allowed Out-of-Service Times for Selected Instrumentation Technical Specifications," February 1991.
7. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.
8. NRC Safety Evaluation Report for Amendment ____.

UNIT 2 TAB

Enclosure 9
Request to Revise Technical Specifications:
Quarterly Surveillance Extension
Bases Page Change Instructions

Unit 2

Page	Instruction
B 3.3-29	Replace
B 3.3-32b	Replace
B 3.3-50	Replace
B 3.3-53	Replace
B 3.3-59	Replace
B 3.3-60	Replace
B 3.3-86	Replace
B 3.3-89	Replace
B 3.3-97	Replace
B 3.3-98	Replace
B 3.3-134	Replace
B 3.3-135	Replace
B 3.3-145	Replace
B 3.3-146	Replace
B 3.3-174	Replace
B 3.3-175a	Replace
B 3.3-184	Replace
B 3.3-185	Replace
B 3.3-186	Replace
B 3.3-193	Replace
B 3.3-195	Replace
B 3.3-201	Replace
B 3.3-202	Replace

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.1.1.9 and SR 3.3.1.1.12

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology. The 92 day on a STAGGERED TEST BASIS Frequency of SR 3.3.1.1.9 is based on a review of the surveillance test history, drift analysis of the associated trip units (if applicable), and Reference 19.

The 18 month Frequency of SR 3.3.1.1.12 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 Surveillance when performed at the 18 month Frequency. The 18 month Frequency for Table 3.3.1.1-1, Function 7.a, is based on Reference 19.

SR 3.3.1.1.10

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. For the APRM Functions, this test supplements the automatic self-test functions that operate continuously in the APRM and voter channels. The APRM CHANNEL FUNCTIONAL TEST covers the APRM channels (including recirculation flow processing — applicable to Function 2.b only), the two-out-of-four voter channels, and the interface connections to the RPS trip systems from the voter channels. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology. The 184 day Frequency of SR 3.1.1.1.10 is based on the reliability analysis of References 13 and 17. (NOTE: The actual voting logic of the two-out-of-four voter channels is tested as part of SR 3.3.1.1.15.)

For Function 2.a, a Note that requires this SR to be performed within 12 hours of entering MODE 2 from MODE 1 is provided. Testing of the MODE 2 APRM Function cannot be performed in MODE 1 without utilizing jumpers or lifted leads. This Note allows entry into MODE 2 from MODE 1 if the associated Frequency is not met per SR 3.0.2.

(continued)

BASES

REFERENCES (continued)

4. FSAR, Supplement 5A.

5. FSAR, Section 15.1.12.

6. NEDO-23842, "Continuous Control Rod Withdrawal in the Startup Range," April 18, 1978.

7. FSAR, Section 15.1.38.

8. P. Check (NRC) letter to G. Lainas (NRC), "BWR Scram Discharge System Safety Evaluation," December 1, 1980.

9. NEDO-30851-P-A, "Technical Specification Improvement Analyses for BWR Reactor Protection System," March 1988.

10. Technical Requirements Manual.

11. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

12. NEDO-32291, "System Analyses for Elimination of Selected Response Time Testing Requirements," January 1994.

13. NEDC-32410P-A, "Nuclear Measurement Analysis and Control Power Range Neutron Monitor (NUMAC PRNM) Retrofit Plus Option III Stability Trip Function," October 1995.

14. NEDO-31960-A, "BWR Owners' Group Long-Term Stability Solutions Licensing Methodology," November 1995.

15. NEDO-31960-A, Supplement 1, "BWR Owners' Group Long-Term Stability Solutions Licensing Methodology," November 1995.

16. NEDO-32465-A, "BWR Owners' Group Long-Term Stability Detect and Suppress Solutions Licensing Basis Methodology and Reload Applications," March 1996.

17. NEDO-32410P-A, Supplement 1, "Nuclear Measurement Analysis and Control Power Range Neutron Monitor (NUMAC PRNM) Retrofit Plus Option III Stability Trip Function," November 1997.

18. Letter, L.A. England (BWROG) to M.J. Virgilio, "BWR Owners' Group Guidelines for Stability Interim Corrective Action," June 6, 1994.

19. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.2.1.1

A CHANNEL FUNCTIONAL TEST is performed for each RBM channel to ensure that the entire channel will perform the intended function. It includes the Reactor Manual Control System input.

Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology. The Frequency of 184 days is based on reliability analyses (Ref. 11).

SR 3.3.2.1.2 and SR 3.3.2.1.3

A CHANNEL FUNCTIONAL TEST is performed for the RWM to ensure that the entire system will perform the intended function. The CHANNEL FUNCTIONAL TEST for the RWM is performed by attempting to withdraw a control rod not in compliance with the prescribed sequence and verifying a control rod block occurs. This test is performed as soon as possible after the applicable conditions are entered. As noted in the SRs, SR 3.3.2.1.2 is not required to be performed until 1 hour after any control rod is withdrawn at < 10% RTP in MODE 2, and SR 3.3.2.1.3 is not required to be performed until 1 hour after THERMAL POWER is < 10% RTP in MODE 1. This allows entry into MODE 2 (and if entered during a shutdown, concurrent power reduction to < 10% RTP) for SR 3.3.2.1.2 and THERMAL POWER reduction to < 10% RTP in MODE 1 for SR 3.3.2.1.3 to perform the required Surveillances if the 92 day on a STAGGERED TEST BASIS Frequency is not met per SR 3.0.2. The 1 hour allowance is based on operating experience and in consideration of providing a reasonable time in which to complete the SRs. The 92 day on a STAGGERED TEST BASIS Frequency is based on a review of the surveillance test history and Reference 12.

SR 3.3.2.1.4

The RBM setpoints are automatically varied as a function of power. Three Allowable Values are specified in Table 3.3.2.1-1, each within a specific power range. The power at which the control rod block Allowable Values automatically change are based on the APRM signal's input to each RBM channel. Below the minimum power setpoint, the RBM is automatically bypassed. These power Allowable Values

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.2.1.8 (continued)

OPERABLE following loading of sequence into RWM, since this is when rod sequence input errors are possible.

REFERENCES

1. FSAR, Section 7.6.2.2.5.

2. FSAR, Section 7.6.8.2.6.

3. NEDC-30474-P, "Average Power Range Monitor, Rod Block Monitor, and Technical Specification Improvements (ARTS) Program for Edwin I. Hatch Nuclear Plants," December 1983.

4. NEDE-24011-P-A-US, "General Electrical Standard Application for Reload Fuel," Supplement for United States, (revision specified in the COLR).

5. Letter from T.A. Pickens (BWROG) to G.C. Lainas (NRC), "Amendment 17 to General Electric Licensing Topical Report NEDE-24011-P-A," BWROG-8644, August 15, 1986.

6. NEDO-21231, "Banked Position Withdrawal Sequence," January 1977.

7. NRC SER, "Acceptance of Referencing of Licensing Topical Report NEDE-24011-P-A," "General Electric Standard Application for Reactor Fuel, Revision 8, Amendment 17," December 27, 1987.

8. NEDC-30851-P-A, "Technical Specification Improvement Analysis for BWR Control Rod Block Instrumentation," October 1988.

9. GENE-770-06-1, "Bases for Changes To Surveillance Test Intervals And Allowed Out-Of-Service Times For Selected Instrumentation Technical Specifications," February 1991.

10. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

11. NEDC-32410P, "Nuclear Measurement Analysis and Control Power Range Neutron Monitor (NUMAC PRNM) Retrofit Plus Option III Stability Trip Function," October 1995.

12. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.2.2.1 (continued)

logic from the input of the alarm unit. This is consistent with the CHANNEL FUNCTIONAL TEST definition requiring the signal to be injected "as close to the sensor as practicable." Additionally, due to the physical location of the turbine trip relays and their close proximity to other sensitive equipment, accessibility is extremely limited. Verification of relay actuation and associated relay contact status by accessing the relay introduces a high potential for turbine trip and reactor scram. One contact from each turbine trip relay energizes an amber light indicating relay actuation. Therefore, it is acceptable to terminate the test at the turbine trip relay, utilizing light indication for relay status. These allowances are only acceptable if the CHANNEL CALIBRATION and the LOGIC SYSTEM FUNCTIONAL TEST overlap both the initiation and termination point of this CHANNEL FUNCTIONAL TEST such that the entire trip logic is tested.

The 92 day on a STAGGERED TEST BASIS Frequency is based on a review of the surveillance test history, drift analysis of the associated trip units, and Reference 4.

SR 3.3.2.2.2

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 range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations, consistent with the plant specific setpoint methodology.

The Frequency is based upon the assumption of an 18 month calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis.

SR 3.3.2.2.3

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required trip logic for a specific channel. The system functional test of the feedwater and main turbine valves is included as part of this Surveillance and overlaps the LOGIC SYSTEM FUNCTIONAL TEST to provide

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.2.2.3 (continued)

complete testing of the assumed safety function. Therefore, if a valve is incapable of operating, the associated instrumentation channels would also be inoperable. 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 Surveillance when performed at the 18 month Frequency.

REFERENCES

1. FSAR, Section 15.1.7.

2. GENE-770-06-1, "Bases for Changes to Surveillance Test Intervals and Allowed Out-Of-Service Times for Selected Instrumentation Technical Specifications," February 1991.

3. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

4. NRC Safety Evaluation Report for Amendment ____.

SURVEILLANCE REQUIREMENTS (continued)

analysis demonstrated that the 6 hour testing allowance does not significantly reduce the probability that the recirculation pumps will trip when necessary.

SR 3.3.4.1.1

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology.

The 92 day on a STAGGERED TEST BASIS Frequency is based on a review of the surveillance test history and Reference 7.

SR 3.3.4.1.2

This SR ensures that an EOC-RPT initiated from the TSV — Closure and TCV Fast Closure, Trip Oil Pressure — Low Functions will not be inadvertently bypassed when THERMAL POWER is ≥ 28% RTP. This involves calibration of the bypass channels. Adequate margins for the instrument setpoint methodologies are incorporated into the actual setpoint. Because main turbine bypass flow can affect this setpoint nonconservatively (THERMAL POWER is derived from first stage pressure) the main turbine bypass valves must remain closed during the calibration at THERMAL POWER ≥ 28% RTP to ensure that the calibration is valid. If any bypass channel's setpoint is nonconservative (i.e., the Functions are bypassed at ≥ 28% RTP, either due to open main turbine bypass valves or other reasons), the affected TSV — Closure and TCV Fast Closure, Trip Oil Pressure — Low Functions are considered inoperable. Alternatively, the bypass channel can be placed in the conservative condition (nonbypass). If placed in the nonbypass condition (Turbine Stop Valve—Closure and Turbine Control Valve Fast Closure, Trip Oil Pressure—Low Functions are enabled), this SR is met with the channel considered OPERABLE.

The Frequency of 18 months is based on engineering judgment and the reliability of the components.

(continued)

BASES

REFERENCES (continued)

4. GENE-770-06-1, "Bases For Changes To Surveillance Test Intervals And Allowed Out-Of-Service Times For Selected Instrumentation Technical Specifications," February 1991.

5. Technical Requirements Manual.

6. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

7. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.4.2.1 (continued)

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

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

SR 3.3.4.2.2

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology.

The 92 day on a STAGGERED TEST BASIS Frequency is based on a review of the surveillance test history, drift analysis of the associated trip units, and Reference 4.

SR 3.3.4.2.3

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 range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations, consistent with the plant specific setpoint methodology.

The Frequency is based upon the assumption of an 18 month calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.4.2.4

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required trip logic for a specific channel. The system functional test of the pump breakers is included as part of this Surveillance and overlaps the LOGIC SYSTEM FUNCTIONAL TEST to provide complete testing of the assumed safety function. Therefore, if a breaker is incapable of operating, the associated instrument channel(s) would be inoperable.

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.

REFERENCES

1. FSAR, Section 7.6.10.7.

2. GENE-770-06-1, "Bases for Changes To Surveillance Test Intervals and Allowed Out-of-Service Times For Selected Instrumentation Technical Specifications," February 1991.

3. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

4. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.5.1.2

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology.

The 92 day on a STAGGERED TEST BASIS Frequency is based on a review of the surveillance test history, drift analysis of the associated trip units, and Reference 7.

SR 3.3.5.1.3 and SR 3.3.5.1.4

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 range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations, consistent with the plant specific setpoint methodology.

The Frequency of SR 3.3.5.1.3 and SR 3.3.5.1.4 is based upon the assumption of the magnitude of equipment drift in the setpoint analysis.

SR 3.3.5.1.5

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required initiation logic for a specific channel. The system functional testing performed in LCO 3.5.1, LCO 3.5.2, LCO 3.7.2, LCO 3.8.1, and LCO 3.8.2 overlaps this Surveillance to 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 Surveillance when performed at the 18 month Frequency.

(continued)

BASES (continued)

REFERENCES

1. FSAR, Section 5.2.

2. FSAR, Section 6.3.

3. FSAR, Chapter 15.

4. NEDC-31376-P, "Edwin I. Hatch Nuclear Power Plant, SAFER/GESTR-LOCA, Loss-of-Coolant Accident Analysis," December 1986.

5. NEDC-30936-P-A, "BWR Owners' Group Technical Specification Improvement Analyses for ECCS Actuation Instrumentation, Part 2," December 1988.

6. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

7. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.5.2.1 (continued)

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

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

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

SR 3.3.5.2.2

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology.

The 92 day on a STAGGERED TEST BASIS Frequency is based on a review of the surveillance test history, drift analysis of the associated trip units, and Reference 3.

SR 3.3.5.2.3 and SR 3.3.5.2.4

A CHANNEL CALIBRATION is a complete check of the instrument loop and the sensor. This test verifies the channel responds to the measured parameter within the necessary range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations, consistent with the plant specific setpoint methodology.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.5.2.3 and SR 3.3.5.2.4 (continued)

The Frequency of SR 3.3.5.2.3 and SR 3.3.5.2.4 is based upon the assumption of the magnitude of equipment drift in the setpoint analysis.

SR 3.3.5.2.5

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required initiation logic for a specific channel. The system functional testing performed in LCO 3.5.3 overlaps this Surveillance 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 that these components usually pass the Surveillance when performed at the 18 month Frequency.

REFERENCES

1. GENE-770-06-2, "Addendum to Bases for Changes to Surveillance Test Intervals and Allowed Out-of-Service Times for Selected Instrumentation Technical Specifications," February 1991.

2. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

3. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.6.1.2 and SR 3.3.6.1.4 (continued)

The 92 day on a STAGGERED TEST BASIS Frequency of SR 3.3.6.1.2 is based on a review of the surveillance test history, drift analysis of the associated trip units (if applicable), and Reference 9. The 184 day Frequency of SR 3.3.6.1.4 is based on engineering judgment and the reliability of the components (time delay relays exhibit minimal drift).

SR 3.3.6.1.3 and SR 3.3.6.1.5

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 range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations, consistent with the plant specific setpoint methodology.

The 92 day on a STAGGERED TEST BASIS Frequency of SR 3.3.6.1.3 is based on a review of the surveillance test history, drift analysis of the associated pressure (or vacuum) switches (if applicable), and Reference 9. The Frequency of SR 3.3.6.1.5 is based on the assumption of the magnitude of equipment drift in the setpoint analysis.

SR 3.3.6.1.6

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required isolation logic for a specific channel. The system functional testing performed on PCIVs in LCO 3.6.1.3 overlaps 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 these components usually pass the Surveillance when performed at the 18 month Frequency.

(continued)

BASES

REFERENCES (continued)

6. Technical Requirements Manual.

7. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

8. NEDO-32291, "System Analyses for Elimination of Selected Response Time Testing Requirements," January 1994.

9. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS (continued)

average time required to perform channel surveillance. That analysis demonstrated the 6 hour testing allowance does not significantly reduce the probability that the SCIVs will isolate the associated penetration flow paths and that the SGT System will initiate when necessary.

SR 3.3.6.2.1

Performance of the CHANNEL CHECK once every 12 hours ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the instrument channels could be an indication of excessive instrument drift in one of the channels or something even more serious. A CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying the instrumentation continues to operate properly between each CHANNEL CALIBRATION.

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

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

SR 3.3.6.2.2

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology.

The 92 day on a STAGGERED TEST BASIS Frequency is based on a review of the surveillance test history, drift analysis of the associated trip units, and Reference 8.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.6.2.3 and SR 3.3.6.2.4

A CHANNEL CALIBRATION is a complete check of the instrument loop and the sensor. This test verifies the channel responds to the measured parameter within the necessary range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations, consistent with the plant specific setpoint methodology.

The 92 day on a STAGGERED TEST BASIS Frequency of SR 3.3.6.2.3 is based on a review of the surveillance test history and Reference 8. The Frequency of SR 3.3.6.2.4 is based on the assumption of the magnitude of equipment drift in the setpoint analysis.

SR 3.3.6.2.5

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required isolation logic for a specific channel. The system functional testing performed on SCIVs and the SGT System in LCO 3.6.4.2 and LCO 3.6.4.3, respectively, overlaps this Surveillance to provide complete testing of the assumed safety function.

While this Surveillance can be performed with the reactor at power for some of the Functions, operating experience has shown that these components usually pass the Surveillance when performed at the 18 month Frequency. Therefore, the Frequency was found to be acceptable from a reliability standpoint.

REFERENCES

1. FSAR, Section 6.3.
2. FSAR, Chapter 15.
3. FSAR, Section 15.1.40.
4. FSAR, Sections 15.1.39 and 15.1.41.
5. NEDC-31677P-A, "Technical Specification Improvement Analysis for BWR Isolation Actuation Instrumentation," July 1990.

(continued)

BASES

REFERENCES (continued)

6. NEDC-30851P-A Supplement 2, "Technical Specifications Improvement Analysis for BWR Isolation Instrumentation Common to RPS and ECCS Instrumentation," March 1989.

7. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

8. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS (continued)

time required to perform channel surveillance. That analysis demonstrated that the 6 hour testing allowance does not significantly reduce the probability that the LLS valves will initiate when necessary.

SR 3.3.6.3.1

Performance of the CHANNEL CHECK once every 12 hours ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on another channel. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the instrument channels could be an indication of excessive instrument drift in one of the channels or something even more serious. A CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying the instrumentation continues to operate properly between each CHANNEL CALIBRATION.

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

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

SR 3.3.6.3.2, SR 3.3.6.3.3, and SR 3.3.6.3.4

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology.

The 92 day on a STAGGERED TEST BASIS Frequency is based on a review of the surveillance test history, drift analysis of the associated trip units (if applicable), and Reference 5.

(continued)

BASES (continued)

REFERENCES

1. FSAR, Section 7.4.4.

2. FSAR, Section 5.5.17.

3. GENE-770-06-1, "Bases for Changes to Surveillance Test Intervals and Allowed Out-of-Service Times for Selected Instrumentation Technical Specifications," February 1991.

4. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

5. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.7.1.1 (continued)

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

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

SR 3.3.7.1.2

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire 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 31 days is based on operating experience with regard to channel OPERABILITY and drift, which demonstrates that failure of more than one channel in any 31 day interval is a rare event.

SR 3.3.7.1.3

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 range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations, consistent with the plant specific setpoint methodology.

The 92 day on a STAGGERED TEST BASIS Frequency is based on a review of the surveillance test history and Reference 8.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.7.1.4

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required initiation logic for a specific channel. The system functional testing performed in LCO 3.7.4, "Main Control Room Environmental Control (MCREC) System," overlaps this Surveillance to provide complete testing of the assumed safety function.

While this Surveillance can be 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 found to be acceptable from a reliability standpoint.

REFERENCES

1. FSAR, Section 7.3.5
2. FSAR, Chapter 6.
3. FSAR, Section 6.4.1.2.2.
4. FSAR, Chapter 15.
5. FSAR, Table 15.1.28.
6. GENE-770-06-1, "Bases for Changes to Surveillance Test Intervals and Allowed Out-of-Service Times for Selected Instrumentation Technical Specifications," February 1991.
7. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.
8. NRC Safety Evaluation Report for Amendment ____.

ENCLOSURE 10 TAB

Enclosure 10

Edwin I. Hatch Nuclear Plant
Request to Revise Technical Specifications:
Quarterly Surveillance Extension

Marked-Up Bases Pages

UNIT 1 TAB

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.1.1.9 and SR 3.3.1.1.12

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology. The 92 day Frequency of SR 3.3.1.1.9 is based on the reliability analysis of Reference 9.

Insert A → of SR 3.3.1.1.12

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 Surveillance when performed at the 18 month Frequency.

Insert B →

SR 3.3.1.1.10

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. For the APRM Functions, this test supplements the automatic self-test functions that operate continuously in the APRM and voter channels. The APRM CHANNEL FUNCTIONAL TEST covers the APRM channels (including recirculation flow processing — applicable to Function 2.b only), the two-out-of-four voter channels, and the interface connections to the RPS trip systems from the voter channels. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology. The 184 day Frequency of SR 3.3.1.1.10 is based on the reliability analysis of References 12 and 16. (NOTE: The actual voting logic of the two-out-of-four voter channels is tested as part of SR 3.3.1.1.15.)

For Function 2.a, a Note that requires this SR to be performed within 12 hours of entering MODE 2 from MODE 1 is provided. Testing of the MODE 2 APRM Function cannot be performed in MODE 1 without utilizing jumpers or lifted leads. This Note allows entry into MODE 2 from MODE 1 if the associated Frequency is not met per SR 3.0.2.

(continued)

BASES

REFERENCES (continued)

9. NEDO-30851-P-A , "Technical Specification Improvement Analyses for BWR Reactor Protection System," March 1988.

10. Technical Requirements Manual.

11. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

12. NEDC-32410P-A, "Nuclear Measurement Analysis and Control Power Range Neutron Monitor (NUMAC PRNM) Retrofit Plus Option III Stability Trip Function," October 1995.

13. NEDO-31960-A, "BWR Owners' Group Long-Term Stability Solutions Licensing Methodology," November 1995.

14. NEDO-31960-A, Supplement 1, "BWR Owners' Group Long-Term Stability Solutions Licensing Methodology," November 1995.

15. NEDO-32465-A, "BWR Owners' Group Long-Term Stability Detect and Suppress Solutions Licensing Basis Methodology and Reload Applications," March 1996.

16. NEDO-32410P-A, Supplement 1, "Nuclear Measurement Analysis and Control Power Range Neutron Monitor (NUMAC PRNM) Retrofit Plus Option III Stability Trip Function," November 1997.

17. Letter, L.A. England (BWROG) to M.J. Virgilio, "BWR Owners' Group Guidelines for Stability Interim Corrective Action," June 6, 1994.

Insert C (Reference 18)

Section B 3.3.1.1 Inserts

Insert A:

(92 day on a STAGGERED TEST BASIS

The ~~184 day~~ Frequency of SR 3.3.1.1.9 is based on a review of the surveillance test history, drift analysis of the associated trip units (if applicable), and Reference 18.

Insert B:

The 18 month Frequency for Table 3.3.1.1-1, Function 7.a, is based on Reference 18.

Insert C:

18. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.2.1.1

A CHANNEL FUNCTIONAL TEST is performed for each RBM channel to ensure that the entire channel will perform the intended function. It includes the Reactor Manual Control System input.

Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology. The Frequency of 184 days is based on reliability analyses (Ref. 11).

SR 3.3.2.1.2 and SR 3.3.2.1.3

A CHANNEL FUNCTIONAL TEST is performed for the RWM to ensure that the entire system will perform the intended function. The CHANNEL FUNCTIONAL TEST for the RWM is performed by attempting to withdraw a control rod not in compliance with the prescribed sequence and verifying a control rod block occurs. This test is performed as soon as possible after the applicable conditions are entered. As noted in the SRs, SR 3.3.2.1.2 is not required to be performed until 1 hour after any control rod is withdrawn at < 10% RTP in MODE 2, and SR 3.3.2.1.3 is not required to be performed until 1 hour after THERMAL POWER is < 10% RTP in MODE 1. This allows entry into MODE 2 (and if entered during a shutdown, concurrent power reduction to < 10% RTP) for SR 3.3.2.1.2 and THERMAL POWER reduction to < 10% RTP in MODE 1 for SR 3.3.2.1.3 to perform the required Surveillances if the 92 day Frequency is not met per SR 3.0.2. The 1 hour allowance is based on operating experience and in consideration of providing a reasonable time in which to complete the SRs. The 92 day Frequencies are based on reliability analysis (Ref. 8).

on a STAGGERED TEST BASIS

Insert A

SR 3.3.2.1.4

The RBM setpoints are automatically varied as a function of power. Three Allowable Values are specified in Table 3.3.2.1-1, each within a specific power range. The power at which the control rod block Allowable Values automatically change are based on the APRM signal's input to each RBM channel. Below the minimum power setpoint, the RBM is automatically bypassed. These power Allowable Values

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.2.1.8 (continued)

OPERABLE following loading of sequence into RWM, since this is when rod sequence input errors are possible.

REFERENCES

1. FSAR, Section 7.5.8.2.3.

2. FSAR, Section 7.2.2.4.

3. NEDC-30474-P, "Average Power Range Monitor, Rod Block Monitor, and Technical Specification Improvements (ARTS) Program for Edwin I. Hatch Nuclear Plants," December 1983.

4. NEDE-24011-P-A-US, "General Electrical Standard Application for Reload Fuel," Supplement for United States, (revision specified in the COLR).

5. Letter from T.A. Pickens (BWROG) to G.C. Lainas (NRC), "Amendment 17 to General Electric Licensing Topical Report NEDE-24011-P-A," BWROG-8644, August 15, 1986.

6. NEDO-21231, "Banked Position Withdrawal Sequence," January 1977.

7. NRC SER, "Acceptance of Referencing of Licensing Topical Report NEDE-24011-P-A," "General Electric Standard Application for Reactor Fuel, Revision 8, Amendment 17," December 27, 1987.

8. NEDC-30851-P-A, "Technical Specification Improvement Analysis for BWR Control Rod Block Instrumentation," October 1988.

9. GENE-770-06-1, "Bases For Changes To Surveillance Test Intervals and Allowed Out-Of-Service Times For Selected Instrumentation Technical Specifications," February 1991.

10. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

11. NEDC-32410P-A, "Nuclear Measurement Analysis and Control Power Range Neutron Monitor (NUMAC PRNM) Retrofit Plus Option III Stability Trip Function," October 1995.

Insert B (Reference 12)

Section B 3.3.2.1 Inserts

Insert A:

92 day ~~on~~ a STAGGERED TEST BASIS

The ~~184 day~~ Frequency is based on a review of the surveillance test history and Reference 12.

Insert B:

12. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.2.2.1 (continued)

logic from the input of the alarm unit. This is consistent with the CHANNEL FUNCTIONAL TEST definition requiring the signal to be injected "as close to the sensor as practicable." Additionally, due to the physical location of the turbine trip relays and their close proximity to other sensitive equipment, accessibility is extremely limited. Verification of relay actuation and associated relay contact status by accessing the relay introduces a high potential for turbine trip and reactor scram. One contact from each turbine trip relay energizes an amber light indicating relay actuation. Therefore, it is acceptable to terminate the test at the turbine trip relay, utilizing light indication for relay status. These allowances are only acceptable if the CHANNEL CALIBRATION and the LOGIC SYSTEM FUNCTIONAL TEST overlap both the initiation and termination point of this CHANNEL FUNCTIONAL TEST such that the entire trip logic is tested.

Insert A → The Frequency of 92 days is based on reliability analysis (Ref. 2).

SR 3.3.2.2.2

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 range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations, consistent with the plant specific setpoint methodology.

The Frequency is based upon the assumption of an 18 month calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis.

SR 3.3.2.2.3

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required trip logic for a specific channel. The system functional test of the feedwater and main turbine valves is included as part of this Surveillance and overlaps the LOGIC SYSTEM FUNCTIONAL TEST to provide

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.2.2.3 (continued)

complete testing of the assumed safety function. Therefore, if a valve is incapable of operating, the associated instrumentation channels would also be inoperable. 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 Surveillance when performed at the 18 month Frequency.

REFERENCES

1. FSAR, Section 14.3.2.1.

2. GENE-770-06-1, "Bases for Changes to Surveillance Test Intervals and Allowed Out-Of-Service Times for Selected Instrumentation Technical Specifications," February 1991.

3. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

Insert B (Reference 4)

Section B 3.3.2.2 Inserts

Insert A:

92 day on a STAGGERED TEST BASIS

The ~~184 day~~ Frequency is based on a review of the surveillance test history, drift analysis of the associated trip units, and Reference 4.

Insert B:

4. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS (continued)

analysis demonstrated that the 6 hour testing allowance does not significantly reduce the probability that the recirculation pumps will trip when necessary.

SR 3.3.4.1.1

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology.

Insert A → The Frequency of 92 days is based on reliability analysis of Reference 4.

SR 3.3.4.1.2

This SR ensures that an EOC-RPT initiated from the TSV — Closure and TCV Fast Closure, Trip Oil Pressure — Low Functions will not be inadvertently bypassed when THERMAL POWER is ≥ 28% RTP. This involves calibration of the bypass channels. Adequate margins for the instrument setpoint methodologies are incorporated into the actual setpoint. Because main turbine bypass flow can affect this setpoint nonconservatively (THERMAL POWER is derived from first stage pressure) the main turbine bypass valves must remain closed during the calibration at THERMAL POWER ≥ 28% RTP to ensure that the calibration is valid. If any bypass channel's setpoint is nonconservative (i.e., the Functions are bypassed at ≥ 28% RTP, either due to open main turbine bypass valves or other reasons), the affected TSV — Closure and TCV Fast Closure, Trip Oil Pressure — Low Functions are considered inoperable. Alternatively, the bypass channel can be placed in the conservative condition (nonbypass). If placed in the nonbypass condition (Turbine Stop Valve—Closure and Turbine Control Valve Fast Closure, Trip Oil Pressure—Low Functions are enabled), this SR is met with the channel considered OPERABLE.

The Frequency of 184 days is based on engineering judgment and reliability of the components.

(continued)

BASES

REFERENCES (continued)

4. GENE-770-06-1, "Bases For Changes To Surveillance Test Intervals And Allowed Out-Of-Service Times For Selected Instrumentation Technical Specifications," February 1991.

5. Technical Requirements Manual.

6. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

Insert B (Reference 7)

Section B 3.3.4.1 Inserts

Insert A:

92 day on a STAGGERED TEST BASIS

The ~~184 day~~ Frequency is based on a review of the surveillance test history and Reference 7.

Insert B:

7. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.4.2.1 (continued)

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

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

SR 3.3.4.2.2

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology.

Insert A → The Frequency of 92 days is based on the reliability analysis of Reference 2.

SR 3.3.4.2.3

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 range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations, consistent with the plant specific setpoint methodology.

The Frequency is based upon the assumption of an 18 month calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.4.2.4

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required trip logic for a specific channel. The system functional test of the pump breakers is included as part of this Surveillance and overlaps the LOGIC SYSTEM FUNCTIONAL TEST to provide complete testing of the assumed safety function. Therefore, if a breaker is incapable of operating, the associated instrument channel(s) would be inoperable.

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.

REFERENCES

1. FSAR, Section 7.23.

2. GENE-770-06-1, "Bases for Changes To Surveillance Test Intervals and Allowed Out-of-Service Times For Selected Instrumentation Technical Specifications," February 1991.

3. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

Insert B (Reference 4)

Section B 3.3.4.2 Inserts

Insert A:

92 day on a STAGGERED TEST BASIS

The ~~184 day~~ Frequency is based on a review of the surveillance test history, drift analysis of the associated trip units, and Reference 4.

Insert B:

4. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.5.1.2

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology.

Insert A → The frequency of 92 days is based on the reliability analyses of Reference 5.

SR 3.3.5.1.3 and SR 3.3.5.1.4

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 range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations, consistent with the plant specific setpoint methodology.

The Frequency of SR 3.3.5.1.3 and SR 3.3.5.1.4 is based upon the assumption of the magnitude of equipment drift in the setpoint analysis.

SR 3.3.5.1.5

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required initiation logic for a specific channel. The system functional testing performed in LCO 3.5.1, LCO 3.5.2, LCO 3.7.2, LCO 3.8.1, and LCO 3.8.2 overlaps this Surveillance to 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 Surveillance when performed at the 18 month Frequency.

(continued)

BASES (continued)

REFERENCES

1. FSAR, Section 4.8.

2. FSAR, Section 6.5.

3. FSAR, Chapter 14.4.

4. NEDC-31376-P, "Edwin I. Hatch Nuclear Power Plant, SAFER/GESTR-LOCA, Loss-of-Coolant Accident Analysis," December 1986.

5. NEDC-30936-P-A, "BWR Owners' Group Technical Specification Improvement Analyses for ECCS Actuation Instrumentation, Part 2," December 1988.

6. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

Insert B (Reference 7)

Section B 3.3.5.1 Inserts

Insert A:

92 day on a STAGGERED TEST BASIS

The ~~184 day~~ Frequency is based on a review of the surveillance test history, drift analysis of the associated trip units, and Reference 7.

Insert B:

7. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.5.2.1 (continued)

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

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

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

SR 3.3.5.2.2

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology.

Insert A → The Frequency of 92 days is based on the reliability analysis of Reference 1.

SR 3.3.5.2.3 and SR 3.3.5.2.4

A CHANNEL CALIBRATION is a complete check of the instrument loop and the sensor. This test verifies the channel responds to the measured parameter within the necessary range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations, consistent with the plant specific setpoint methodology.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.5.2.3 and SR 3.3.5.2.4 (continued)

The Frequency of SR 3.3.5.2.3 and SR 3.3.5.2.4 is based upon the assumption of the magnitude of equipment drift in the setpoint analysis.

SR 3.3.5.2.5

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required initiation logic for a specific channel. The system functional testing performed in LCO 3.5.3 overlaps this Surveillance 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 that these components usually pass the Surveillance when performed at the 18 month Frequency.

REFERENCES

1. GENE-770-06-2, "Addendum to Bases for Changes to Surveillance Test Intervals and Allowed Out-of-Service Times for Selected Instrumentation Technical Specifications," February 1991.

2. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

Insert B (Reference 3)

Section B 3.3.5.2 Inserts

Insert A:

The 184 day Frequency is based on a review of the surveillance test history, drift analysis of the associated trip units, and Reference 3.

Insert B:

3. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.6.1.2 and SR 3.3.6.1.4 (continued)

Insert A → The 92 day Frequency of SR 3.3.6.1.2 is based on the reliability analysis described in References 4 and 5. The 184 day Frequency of SR 3.3.6.1.4 is based on engineering judgment and the reliability of the components (time delay relays exhibit minimal drift).

SR 3.3.6.1.3 and SR 3.3.6.1.5

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 range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations, consistent with the plant specific setpoint methodology.

Insert B → The Frequency of SR 3.3.6.1.3 and SR 3.3.6.1.5 is based on the assumption of the magnitude of equipment drift in the setpoint analysis.

SR 3.3.6.1.6

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required isolation logic for a specific channel. The system functional testing performed on PCIVs in LCO 3.6.1.3 overlaps 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 these components usually pass the Surveillance when performed at the 18 month Frequency.

(continued)

BASES (continued)

REFERENCES

1. FSAR, Section 5.2.

2. FSAR, Chapter 14.

3. FSAR, Section 3.8.3.

4. NEDC-31677P-A, "Technical Specification Improvement Analysis for BWR Isolation Actuation Instrumentation," July 1990.

5. NEDC-30851P-A Supplement 2, "Technical Specifications Improvement Analysis for BWR Isolation Instrumentation Common to RPS and ECCS Instrumentation," March 1989.

6. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

Insert C (Reference 7)

Section B 3.3.6.1 Inserts

Insert A:

92 day on a STAGGERED TEST BASIS

The ~~184 day~~ Frequency of SR 3.3.6.1.2 is based on a review of the surveillance test history, drift analysis of the associated trip units (if applicable), and Reference 7.

Insert B:

92 day on a STAGGERED TEST BASIS

The ~~184 day~~ Frequency of SR 3.3.6.1.3 is based on a review of the surveillance test history, drift analysis of the associated pressure (or vacuum) switches (if applicable), and Reference 7.

Insert C:

7. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS (continued)

average time required to perform channel surveillance. That analysis demonstrated the 6 hour testing allowance does not significantly reduce the probability that the SCIVs will isolate the associated penetration flow paths and that the SGT System will initiate when necessary.

SR 3.3.6.2.1

Performance of the CHANNEL CHECK once every 12 hours ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the instrument channels could be an indication of excessive instrument drift in one of the channels or something even more serious. A CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying the instrumentation continues to operate properly between each CHANNEL CALIBRATION.

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

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

SR 3.3.6.2.2

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology.

Insert A → The Frequency of 92 days is based on the reliability analysis of References 5 and 6.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.6.2.3 and SR 3.3.6.2.4

A CHANNEL CALIBRATION is a complete check of the instrument loop and the sensor. This test verifies the channel responds to the measured parameter within the necessary range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations, consistent with the plant specific setpoint methodology.

Insert B → The Frequencies of SR 3.3.6.2.3 and SR 3.3.6.2.4 are based on the assumption of the magnitude of equipment drift in the setpoint analysis.

SR 3.3.6.2.5

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required isolation logic for a specific channel. The system functional testing performed on SCIVs and the SGT System in LCO 3.6.4.2 and LCO 3.6.4.3, respectively, overlaps this Surveillance to provide complete testing of the assumed safety function.

While this Surveillance can be performed with the reactor at power for some of the Functions, operating experience has shown that these components usually pass the Surveillance when performed at the 18 month Frequency. Therefore, the Frequency was found to be acceptable from a reliability standpoint.

REFERENCES

1. FSAR, Section 5.2.
2. FSAR, Chapter 14.4.
3. FSAR, Sections 14.4.5 and 14.5.4.
4. FSAR, Sections 14.4.3, 14.4.4, 14.5.2, and 14.5.3.
5. NEDC-31677P-A, "Technical Specification Improvement Analysis for BWR Isolation Actuation Instrumentation," July 1990.

(continued)

BASES

REFERENCES (continued)

6. NEDC-30851P-A Supplement 2, "Technical Specifications Improvement Analysis for BWR Isolation Instrumentation Common to RPS and ECCS Instrumentation," March 1989.

7. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

Insert C (Reference 8)

Section B 3.3.6.2 Inserts

Insert A:

92 day on a STAGGERED TEST BASIS

The ~~184 day~~ Frequency is based on a review of the surveillance test history, drift analysis of the associated trip units, and Reference 8.

Insert B:

92 day on a STAGGERED TEST BASIS

The ~~184 day~~ Frequency of SR 3.3.6.2.3 is based on a review of the surveillance test history and Reference 8.

Insert C:

8. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS (continued)

time required to perform channel surveillance. That analysis demonstrated that the 6 hour testing allowance does not significantly reduce the probability that the LLS valves will initiate when necessary.

SR 3.3.6.3.1

Performance of the CHANNEL CHECK once every 12 hours ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on another channel. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the instrument channels could be an indication of excessive instrument drift in one of the channels or something even more serious. A CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying the instrumentation continues to operate properly between each CHANNEL CALIBRATION.

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

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

SR 3.3.6.3.2, SR 3.3.6.3.3, and SR 3.3.6.3.4

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology.

Insert A → The 92 day Frequency is based on the reliability analysis of Reference 3.

(continued)

BASES (continued)

REFERENCES

1. FSAR, Section 7.19.

2. FSAR, Section 4.11.

3. GENE-770-06-1, "Bases for Changes to Surveillance Test Intervals and Allowed Out-of-Service Times for Selected Instrumentation Technical Specifications," February 1991.

4. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

Insert B (Reference 5)

Section B 3.3.6.3 Inserts

Insert A:

92 day on a STAGGERED TEST BASIS

The ~~184 day~~ Frequency is based on a review of the surveillance test history, drift analysis of the associated trip units (if applicable), and Reference 5.

Insert B:

5. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.7.1.1 (continued)

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

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

SR 3.3.7.1.2

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire 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 31 days is based on operating experience with regard to channel OPERABILITY and drift, which demonstrates that failure of more than one channel in any 31 day interval is a rare event.

SR 3.3.7.1.3

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 range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations, consistent with the plant specific setpoint methodology.

Insert A → The Frequency is based upon the assumption of the magnitude of equipment drift in the setpoint analysis.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.7.1.4

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required initiation logic for a specific channel. The system functional testing performed in LCO 3.7.4, "Main Control Room Environmental Control (MCREC) System," overlaps this Surveillance to provide complete testing of the assumed safety function.

While this Surveillance can be 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 found to be acceptable from a reliability standpoint.

REFERENCES

1. Unit 2 FSAR, Section 7.3.5
2. FSAR, Section 5.2.
3. Unit 2 FSAR, Section 6.4.1.2.2.
4. FSAR, Chapter 14.
5. Unit 2 FSAR, Table 15.1.28.
6. GENE-770-06-1, "Bases for Changes to Surveillance Test Intervals and Allowed Out-of-Service Times for Selected Instrumentation Technical Specifications," February 1991.
7. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

Insert B (Reference 8)

Section B 3.3.7.1 Inserts

Insert A:

92 day on a STAGGERED TEST BASIS

The ~~184 day~~ Frequency is based on a review of the surveillance test history and Reference 8.

Insert B:

8. NRC Safety Evaluation Report for Amendment _____.

UNIT 2 TAB

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.1.1.9 and SR 3.3.1.1.12

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology. The 92 day Frequency of SR 3.3.1.1.9 is based on the reliability analysis of reference 9.

Insert A → of SR 3.3.1.1.12

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 Surveillance when performed at the 18 month Frequency.

Insert B →

SR 3.3.1.1.10

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. For the APRM Functions, this test supplements the automatic self-test functions that operate continuously in the APRM and voter channels. The APRM CHANNEL FUNCTIONAL TEST covers the APRM channels (including recirculation flow processing — applicable to Function 2.b only), the two-out-of-four voter channels, and the interface connections to the RPS trip systems from the voter channels. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology. The 184 day Frequency of SR 3.1.1.1.10 is based on the reliability analysis of References 13 and 17. (NOTE: The actual voting logic of the two-out-of-four voter channels is tested as part of SR 3.3.1.1.15.)

For Function 2.a, a Note that requires this SR to be performed within 12 hours of entering MODE 2 from MODE 1 is provided. Testing of the MODE 2 APRM Function cannot be performed in MODE 1 without utilizing jumpers or lifted leads. This Note allows entry into MODE 2 from MODE 1 if the associated Frequency is not met per SR 3.0.2.

(continued)

BASES

REFERENCES (continued)

4. FSAR, Supplement 5A.

5. FSAR, Section 15.1.12.

6. NEDO-23842, "Continuous Control Rod Withdrawal in the Startup Range," April 18, 1978.

7. FSAR, Section 15.1.38.

8. P. Check (NRC) letter to G. Lainas (NRC), "BWR Scram Discharge System Safety Evaluation," December 1, 1980.

9. NEDO-30851-P-A, "Technical Specification Improvement Analyses for BWR Reactor Protection System," March 1988.

10. Technical Requirements Manual.

11. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

12. NEDO-32291, "System Analyses for Elimination of Selected Response Time Testing Requirements," January 1994.

13. NEDC-32410P-A, "Nuclear Measurement Analysis and Control Power Range Neutron Monitor (NUMAC PRNM) Retrofit Plus Option III Stability Trip Function," October 1995.

14. NEDO-31960-A, "BWR Owners' Group Long-Term Stability Solutions Licensing Methodology," November 1995.

15. NEDO-31960-A, Supplement 1, "BWR Owners' Group Long-Term Stability Solutions Licensing Methodology," November 1995.

16. NEDO-32465-A, "BWR Owners' Group Long-Term Stability Detect and Suppress Solutions Licensing Basis Methodology and Reload Applications," March 1996.

17. NEDO-32410P-A, Supplement 1, "Nuclear Measurement Analysis and Control Power Range Neutron Monitor (NUMAC PRNM) Retrofit Plus Option III Stability Trip Function," November 1997.

18. Letter, L.A. England (BWROG) to M.J. Virgilio, "BWR Owners' Group Guidelines for Stability Interim Corrective Action," June 6, 1994.

Insert C (Reference 19)

Section B 3.3.1.1 Inserts

Insert A:
92 day on a STAGGERED TEST BASIS

The ~~184 day~~ Frequency of SR 3.3.1.1.9 is based on a review of the surveillance test history, drift analysis of the associated trip units (if applicable), and Reference 19.

Insert B:

The 18 month Frequency for Table 3.3.1.1-1, Function 7.a, is based on Reference 19.

Insert C:

19. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.2.1.1

A CHANNEL FUNCTIONAL TEST is performed for each RBM channel to ensure that the entire channel will perform the intended function. It includes the Reactor Manual Control System input.

Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology. The Frequency of 184 days is based on reliability analyses (Ref. 11).

SR 3.3.2.1.2 and SR 3.3.2.1.3

A CHANNEL FUNCTIONAL TEST is performed for the RWM to ensure that the entire system will perform the intended function. The CHANNEL FUNCTIONAL TEST for the RWM is performed by attempting to withdraw a control rod not in compliance with the prescribed sequence and verifying a control rod block occurs. This test is performed as soon as possible after the applicable conditions are entered. As noted in the SRs, SR 3.3.2.1.2 is not required to be performed until 1 hour after any control rod is withdrawn at < 10% RTP in MODE 2, and SR 3.3.2.1.3 is not required to be performed until 1 hour after THERMAL POWER is < 10% RTP in MODE 1. This allows entry into MODE 2 (and if entered during a shutdown, concurrent power reduction to < 10% RTP) for SR 3.3.2.1.2 and THERMAL POWER reduction to < 10% RTP in MODE 1 for SR 3.3.2.1.3 to perform the required Surveillances if the 92 day Frequency is not met per SR 3.0.2. The 1 hour allowance is based on operating experience and in consideration of providing a reasonable time in which to complete the SRs. The 92 day Frequencies are based on reliability analysis (Ref. 8).

on a STAGGERED TEST BASIS

INSERT A

SR 3.3.2.1.4

The RBM setpoints are automatically varied as a function of power. Three Allowable Values are specified in Table 3.3.2.1-1, each within a specific power range. The power at which the control rod block Allowable Values automatically change are based on the APRM signal's input to each RBM channel. Below the minimum power setpoint, the RBM is automatically bypassed. These power Allowable Values

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.2.1.8 (continued)

OPERABLE following loading of sequence into RWM, since this is when rod sequence input errors are possible.

REFERENCES

1. FSAR, Section 7.6.2.2.5.

2. FSAR, Section 7.6.8.2.6.

3. NEDC-30474-P, "Average Power Range Monitor, Rod Block Monitor, and Technical Specification Improvements (ARTS) Program for Edwin I. Hatch Nuclear Plants," December 1983.

4. NEDE-24011-P-A-US, "General Electrical Standard Application for Reload Fuel," Supplement for United States, (revision specified in the COLR).

5. Letter from T.A. Pickens (BWROG) to G.C. Lainas (NRC), "Amendment 17 to General Electric Licensing Topical Report NEDE-24011-P-A," BWROG-8644, August 15, 1986.

6. NEDO-21231, "Banked Position Withdrawal Sequence," January 1977.

7. NRC SER, "Acceptance of Referencing of Licensing Topical Report NEDE-24011-P-A," "General Electric Standard Application for Reactor Fuel, Revision 8, Amendment 17," December 27, 1987.

8. NEDC-30851-P-A, "Technical Specification Improvement Analysis for BWR Control Rod Block Instrumentation," October 1988.

9. GENE-770-06-1, "Bases for Changes To Surveillance Test Intervals And Allowed Out-Of-Service Times For Selected Instrumentation Technical Specifications," February 1991.

10. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

11. NEDC-32410P-A, "Nuclear Measurement Analysis and Control Power Range Neutron Monitor (NUMAC PRNM) Retrofit Plus Option III Stability Trip Function," October 1995.

Insert B (Reference 12)

Section B 3.3.2.1 Inserts

Insert A:

92 day on a STAGGERED TEST BASIS

The ~~184 day~~ Frequency is based on a review of the surveillance test history and Reference 12.

Insert B:

12. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.2.2.1 (continued)

logic from the input of the alarm unit. This is consistent with the CHANNEL FUNCTIONAL TEST definition requiring the signal to be injected "as close to the sensor as practicable." Additionally, due to the physical location of the turbine trip relays and their close proximity to other sensitive equipment, accessibility is extremely limited. Verification of relay actuation and associated relay contact status by accessing the relay introduces a high potential for turbine trip and reactor scram. One contact from each turbine trip relay energizes an amber light indicating relay actuation. Therefore, it is acceptable to terminate the test at the turbine trip relay, utilizing light indication for relay status. These allowances are only acceptable if the CHANNEL CALIBRATION and the LOGIC SYSTEM FUNCTIONAL TEST overlap both the initiation and termination point of this CHANNEL FUNCTIONAL TEST such that the entire trip logic is tested.

Insert A → The Frequency of 92 days is based on reliability analysis (Ref. 2).

SR 3.3.2.2.2

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 range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations, consistent with the plant specific setpoint methodology.

The Frequency is based upon the assumption of an 18 month calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis.

SR 3.3.2.2.3

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required trip logic for a specific channel. The system functional test of the feedwater and main turbine valves is included as part of this Surveillance and overlaps the LOGIC SYSTEM FUNCTIONAL TEST to provide

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.2.2.3 (continued)

complete testing of the assumed safety function. Therefore, if a valve is incapable of operating, the associated instrumentation channels would also be inoperable. 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 Surveillance when performed at the 18 month Frequency.

REFERENCES

1. FSAR, Section 15.1.7.

2. GENE-770-06-1, "Bases for Changes to Surveillance Test Intervals and Allowed Out-Of-Service Times for Selected Instrumentation Technical Specifications," February 1991.

3. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

Insert B (Reference 4)

Section B 3.3.2.2 Inserts

Insert A:

92 day on a STAGGERED TEST BASIS

The ~~184 day~~ Frequency is based on a review of the surveillance test history, drift analysis of the associated trip units, and Reference 4.

Insert B:

4. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS (continued)

analysis demonstrated that the 6 hour testing allowance does not significantly reduce the probability that the recirculation pumps will trip when necessary.

SR 3.3.4.1.1

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology.

Insert A → The Frequency of 92 days is based on reliability analysis of Reference 4.

SR 3.3.4.1.2

This SR ensures that an EOC-RPT initiated from the TSV — Closure and TCV Fast Closure, Trip Oil Pressure — Low Functions will not be inadvertently bypassed when THERMAL POWER is ≥ 28% RTP. This involves calibration of the bypass channels. Adequate margins for the instrument setpoint methodologies are incorporated into the actual setpoint. Because main turbine bypass flow can affect this setpoint nonconservatively (THERMAL POWER is derived from first stage pressure) the main turbine bypass valves must remain closed during the calibration at THERMAL POWER ≥ 28% RTP to ensure that the calibration is valid. If any bypass channel's setpoint is nonconservative (i.e., the Functions are bypassed at ≥ 28% RTP, either due to open main turbine bypass valves or other reasons), the affected TSV — Closure and TCV Fast Closure, Trip Oil Pressure — Low Functions are considered inoperable. Alternatively, the bypass channel can be placed in the conservative condition (nonbypass). If placed in the nonbypass condition (Turbine Stop Valve—Closure and Turbine Control Valve Fast Closure, Trip Oil Pressure—Low Functions are enabled), this SR is met with the channel considered OPERABLE.

The Frequency of 18 months is based on engineering judgment and the reliability of the components.

(continued)

BASES

REFERENCES (continued)

4. GENE-770-06-1, "Bases For Changes To Surveillance Test Intervals And Allowed Out-Of-Service Times For Selected Instrumentation Technical Specifications," February 1991.

5. Technical Requirements Manual.

6. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

Insert B (Reference 7)

Section B 3.3.4.1 Inserts

Insert A:

92 day on a STAGGERED TEST BASIS

The ~~184 day~~ Frequency is based on a review of the surveillance test history and Reference 7.

Insert B:

7. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.4.2.1 (continued)

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

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

SR 3.3.4.2.2

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology.

Insert A → The Frequency of 92 days is based on the reliability analysis of Reference 2.

SR 3.3.4.2.3

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 range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations, consistent with the plant specific setpoint methodology.

The Frequency is based upon the assumption of an 18 month calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.4.2.4

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required trip logic for a specific channel. The system functional test of the pump breakers is included as part of this Surveillance and overlaps the LOGIC SYSTEM FUNCTIONAL TEST to provide complete testing of the assumed safety function. Therefore, if a breaker is incapable of operating, the associated instrument channel(s) would be inoperable.

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.

REFERENCES

1. FSAR, Section 7.6.10.7.

2. GENE-770-06-1, "Bases for Changes To Surveillance Test Intervals and Allowed Out-of-Service Times For Selected Instrumentation Technical Specifications," February 1991.

3. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

Insert B (Reference 4)

Section B 3.3.4.2 Inserts

Insert A:

92 day on a STAGGERED TEST BASIS

The ~~184 day~~ Frequency is based on a review of the surveillance test history, drift analysis of the associated trip units, and Reference 4.

Insert B:

4. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.5.1.2

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology.

Insert A → The Frequency of 92 days is based on the reliability analyses of Reference 5.

SR 3.3.5.1.3 and SR 3.3.5.1.4

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 range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations, consistent with the plant specific setpoint methodology.

The Frequency of SR 3.3.5.1.3 and SR 3.3.5.1.4 is based upon the assumption of the magnitude of equipment drift in the setpoint analysis.

SR 3.3.5.1.5

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required initiation logic for a specific channel. The system functional testing performed in LCO 3.5.1, LCO 3.5.2, LCO 3.7.2, LCO 3.8.1, and LCO 3.8.2 overlaps this Surveillance to 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 Surveillance when performed at the 18 month Frequency.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

REFERENCES

1. FSAR, Section 5.2.

2. FSAR, Section 6.3.

3. FSAR, Chapter 15.

4. NEDC-31376-P, "Edwin I. Hatch Nuclear Power Plant, SAFER/GESTR-LOCA, Loss-of-Coolant Accident Analysis," December 1986.

5. NEDC-30936-P-A, "BWR Owners' Group Technical Specification Improvement Analyses for ECCS Actuation Instrumentation, Part 2," December 1988.

6. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

Insert B (Reference 7)

Section B 3.3.5.1 Inserts

Insert A:

92 day on a STAGGERED TEST BASIS

The ~~184 day~~ Frequency is based on a review of the surveillance test history, drift analysis of the associated trip units, and Reference 7.

Insert B:

7. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.5.2.1 (continued)

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

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

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

SR 3.3.5.2.2

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology.

Insert A → The Frequency of 92 days is based on the reliability analysis of Reference 1.

SR 3.3.5.2.3 and SR 3.3.5.2.4

A CHANNEL CALIBRATION is a complete check of the instrument loop and the sensor. This test verifies the channel responds to the measured parameter within the necessary range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations, consistent with the plant specific setpoint methodology.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.5.2.3 and SR 3.3.5.2.4 (continued)

The Frequency of SR 3.3.5.2.3 and SR 3.3.5.2.4 is based upon the assumption of the magnitude of equipment drift in the setpoint analysis.

SR 3.3.5.2.5

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required initiation logic for a specific channel. The system functional testing performed in LCO 3.5.3 overlaps this Surveillance 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 that these components usually pass the Surveillance when performed at the 18 month Frequency.

REFERENCES

1. GENE-770-06-2, "Addendum to Bases for Changes to Surveillance Test Intervals and Allowed Out-of-Service Times for Selected Instrumentation Technical Specifications," February 1991.

2. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

Insert B (Reference 3)

Section B 3.3.5.2 Inserts

Insert A:

92 day on a STAGGERED TEST BASIS

The ~~184 day~~ Frequency is based on a review of the surveillance test history, drift analysis of the associated trip units, and Reference 3.

Insert B:

3. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.6.1.2 and SR 3.3.6.1.4 (continued)

Insert A → The 92 day Frequency of SR 3.3.6.1.2 is based on the reliability analysis described in References 4 and 5. The 184 day Frequency of SR 3.3.6.1.4 is based on engineering judgment and the reliability of the components (time delay relays exhibit minimal drift).

SR 3.3.6.1.3 and SR 3.3.6.1.5

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 range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations, consistent with the plant specific setpoint methodology.

Insert B → The Frequency of SR 3.3.6.1.3 and SR 3.3.6.1.5 is based on the assumption of the magnitude of equipment drift in the setpoint analysis.

SR 3.3.6.1.6

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required isolation logic for a specific channel. The system functional testing performed on PCIVs in LCO 3.6.1.3 overlaps 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 these components usually pass the Surveillance when performed at the 18 month Frequency.

SR 3.3.6.1.7

This SR ensures that the individual channel response times are less than or equal to the maximum values assumed in the accident analysis. The instrument response times must be added to the PCIV closure times to obtain the ISOLATION SYSTEM RESPONSE TIME.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.6.1.7 (continued)

ISOLATION SYSTEM RESPONSE TIME acceptance criteria are included in Reference 6. This test may be performed in one measurement, or in overlapping segments, with verification that all components are tested.

A Note to the Surveillance states that the channel sensors are excluded from ISOLATION SYSTEM RESPONSE TIME testing. The exclusion of the channel sensors is supported by Reference 8 which indicates that the sensors' response times are a small fraction of the total response time. Even if the sensors experienced response time degradation, they would be expected to respond in the microsecond to millisecond range until complete failure.

ISOLATION SYSTEM RESPONSE TIME tests are conducted on an 18 month STAGGERED TEST BASIS. This Frequency is consistent with the typical industry refueling cycle and is based upon plant operating experience that shows that random failures of instrumentation components causing serious response time degradation, but not channel failure, are infrequent occurrences.

REFERENCES

1. FSAR, Section 6.3.

2. FSAR, Chapter 15.

3. FSAR, Section 4.2.3.4.2.

4. NEDC-31677P-A, "Technical Specification Improvement Analysis for BWR Isolation Actuation Instrumentation," July 1990.

5. NEDC-30851P-A Supplement 2, "Technical Specifications Improvement Analysis for BWR Isolation Instrumentation Common to RPS and ECCS Instrumentation," March 1989.

6. Technical Requirements Manual.

7. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

8. NEDO-32291, "System Analyses for Elimination of Selected Response Time Testing Requirements," January 1994.

Insert C (Reference 9)

Section B 3.3.6.1 Inserts

Insert A:

92 day on a STAGGERED TEST BASIS

The ~~184 day~~ Frequency of SR 3.3.6.1.2 is based on a review of the surveillance test history, drift analysis of the associated trip units (if applicable), and Reference 9.

Insert B:

92 day on a STAGGERED TEST BASIS

The ~~184 day~~ Frequency of SR 3.3.6.1.3 is based on a review of the surveillance test history, drift analysis of the associated pressure (or vacuum) switches (if applicable), and Reference 9.

Insert C:

9. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS (continued)

average time required to perform channel surveillance. That analysis demonstrated the 6 hour testing allowance does not significantly reduce the probability that the SCIVs will isolate the associated penetration flow paths and that the SGT System will initiate when necessary.

SR 3.3.6.2.1

Performance of the CHANNEL CHECK once every 12 hours ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the instrument channels could be an indication of excessive instrument drift in one of the channels or something even more serious. A CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying the instrumentation continues to operate properly between each CHANNEL CALIBRATION.

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

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

SR 3.3.6.2.2

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology.

Insert A → The Frequency of 92 days is based on the reliability analysis of References 5 and 6.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.6.2.3 and SR 3.3.6.2.4

A CHANNEL CALIBRATION is a complete check of the instrument loop and the sensor. This test verifies the channel responds to the measured parameter within the necessary range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations, consistent with the plant specific setpoint methodology.

Insert B → The Frequencies of SR 3.3.6.2.3 and SR 3.3.6.2.4 are based on the assumption of the magnitude of equipment drift in the setpoint analysis.

SR 3.3.6.2.5

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required isolation logic for a specific channel. The system functional testing performed on SCIVs and the SGT System in LCO 3.6.4.2 and LCO 3.6.4.3, respectively, overlaps this Surveillance to provide complete testing of the assumed safety function.

While this Surveillance can be performed with the reactor at power for some of the Functions, operating experience has shown that these components usually pass the Surveillance when performed at the 18 month Frequency. Therefore, the Frequency was found to be acceptable from a reliability standpoint.

REFERENCES

1. FSAR, Section 6.3.
2. FSAR, Chapter 15.
3. FSAR, Section 15.1.40.
4. FSAR, Sections 15.1.39 and 15.1.41.
5. NEDC-31677P-A, "Technical Specification Improvement Analysis for BWR Isolation Actuation Instrumentation," July 1990.

(continued)

BASES

REFERENCES (continued)

6. NEDC-30851P-A Supplement 2, "Technical Specifications Improvement Analysis for BWR Isolation Instrumentation Common to RPS and ECCS Instrumentation," March 1989.

Insert C (Reference 8)

7. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

Section B 3.3.6.2 Inserts

Insert A:

92 day on a STAGGERED TEST BASIS

The ~~184 day~~ Frequency is based on a review of the surveillance test history, drift analysis of the associated trip units, and Reference 8.

Insert B:

92 day on a STAGGERED TEST BASIS

The ~~184 day~~ Frequency of SR 3.3.6.2.3 is based on a review of the surveillance test history and Reference 8.

Insert C:

8. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS (continued)

time required to perform channel surveillance. That analysis demonstrated that the 6 hour testing allowance does not significantly reduce the probability that the LLS valves will initiate when necessary.

SR 3.3.6.3.1

Performance of the CHANNEL CHECK once every 12 hours ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on another channel. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the instrument channels could be an indication of excessive instrument drift in one of the channels or something even more serious. A CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying the instrumentation continues to operate properly between each CHANNEL CALIBRATION.

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

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

SR 3.3.6.3.2, SR 3.3.6.3.3, and SR 3.3.6.3.4

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology.

Insert A → The 92 day Frequency is based on the reliability analysis of Reference 3.

(continued)

BASES (continued)

REFERENCES

1. FSAR, Section 7.4.4.

2. FSAR, Section 5.5.17.

3. GENE-770-06-1, "Bases for Changes to Surveillance Test Intervals and Allowed Out-of-Service Times for Selected Instrumentation Technical Specifications," February 1991.

4. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

Insert B (Reference 5)

Section B 3.3.6.3 Inserts

Insert A:

92 day on a STAGGERED TEST BASIS

The ~~184 day~~ Frequency is based on a review of the surveillance test history, drift analysis of the associated trip units (if applicable), and Reference 5.

Insert B:

5. NRC Safety Evaluation Report for Amendment ____.

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.7.1.1 (continued)

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

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

SR 3.3.7.1.2

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire 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 31 days is based on operating experience with regard to channel OPERABILITY and drift, which demonstrates that failure of more than one channel in any 31 day interval is a rare event.

SR 3.3.7.1.3

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 range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations, consistent with the plant specific setpoint methodology.

Insert A → The Frequency is based upon the assumption of the magnitude of equipment drift in the setpoint analysis.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.7.1.4

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required initiation logic for a specific channel. The system functional testing performed in LCO 3.7.4, "Main Control Room Environmental Control (MCREC) System," overlaps this Surveillance to provide complete testing of the assumed safety function.

While this Surveillance can be 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 found to be acceptable from a reliability standpoint.

REFERENCES

1. FSAR, Section 7.3.5
2. FSAR, Chapter 6.
3. FSAR, Section 6.4.1.2.2.
4. FSAR, Chapter 15.
5. FSAR, Table 15.1.28.
6. GENE-770-06-1, "Bases for Changes to Surveillance Test Intervals and Allowed Out-of-Service Times for Selected Instrumentation Technical Specifications," February 1991.
7. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

Insert B (Reference 8)

Section B 3.3.7.1 Inserts

Insert A:

92 day on a STAGGERED TEST BASIS

The ~~184 day~~ Frequency is based on a review of the surveillance test history and Reference 8.

Insert B:

8. NRC Safety Evaluation Report for Amendment ____.