

Industry/TSTF Standard Technical Specification Change Traveler

Eliminate SR 3.8.2.1, Note 2 from the PWR ITS NUREGs

NUREGs Affected: 1430 1431 1432 1433 1434

Classification: 1) Technical Change

Recommended for CLIIP?: No

Priority: 3)Low

Simple or Complex Change: Complex

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1.0 Description

SR 3.8.2.1, Note 2, is eliminated from the PWR ITS NUREGs (NUREGs-1430 through 1432) and SR 3.8.1.12 and SR 3.8.1.19 are excluded from SR 3.8.2.

2.0 Proposed Change

SR 3.8.2.1, Note 2, is eliminated from the PWR ITS NUREGs (NUREGs-1430 through 1432) and SR 3.8.1.12 and SR 3.8.1.19 are excluded from SR 3.8.2. These Surveillances are not applicable to PWRs during shutdown.

3.0 Background

TSTF-300 modified Surveillance 3.8.2.1 by adding a Note which states "SR 3.8.1.12 and SR 3.8.1.19 are not required to be met when associated ECCS subsystem(s) are not required to be OPERABLE per LCO 3.5.3, ECCS - Shutdown." TSTF-300 was a BWROG originated change which was applied to all five ITS NUREGs. TSTF-300 was approved by the NRC on 4/21/99.

The Bases Insert 2 to TSTF-300, which applies to the PWRs, states, "Note 2 states that SRs 3.8.1.12 and 3.8.1.19 are not required to be met when its associated ECCS subsystem(s) are not required to be OPERABLE." This addition is unnecessary. The PWR ECCS subsystem(s) are required to be OPERABLE in MODES 1-4 and the ESF actuation signal required to perform the Surveillances is only required to be OPERABLE in MODES 1 - 4. LCO 3.8.2 only applies in MODES 5 and 6 and during movement of [recently] irradiated fuel. Therefore, these SRs are never required.

02-Jun-02

4.0 Technical Analysis

SR 3.8.1.12 verifies DG auto-start on an actual or simulated Engineered Safety Feature (ESF) actuation signal. SR 3.8.1.19 verifies sequencing of the emergency busses on a loss of offsite power in conjunction with an actual or simulated ESF actuation signal. The ESF actuation signals, described in ISTS Specification 3.3.2, Table 3.3.2-1, are only required to be OPERABLE in MODES 1 through 4 and are not required to be OPERABLE during the movement of [recently] irradiated fuel. LCO 3.8.2 is only applicable in MODES 5 and 6, and during movement of [recently] irradiated fuel assemblies. Therefore, there is no overlap in the Applicability of these requirements, and under SR 3.8.2.1, Note 2, SR 3.8.1.12 and SR 3.8.1.19 are never required.

This error occurred because of an unrecognized difference between the BWR and PWR specifications. The BWR LCO 3.8.2 is applicable in MODES 4 and 5 and some of the ESF actuation instrumentation is required to be OPERABLE in MODES 4 and 5. Therefore, the Note added to SR 3.8.2.1 is correct for the BWR specifications. However, it is not correct for the PWR specifications for the reasons given above. This change corrects this error.

5.0 Regulatory Analysis

5.1 No Significant Hazards Consideration

The TSTF has evaluated whether or not a significant hazards consideration is involved with the proposed generic change by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed change eliminates SR 3.8.2.1, Note 2, from the PWR ITS NUREGs and states that SR 3.8.1.12 and SR 3.8.1.19 are not required to be met in MODES 5 and 6 and during movement of [recently] irradiated fuel. The performance of Surveillances is not an initiator to any accident previously evaluated. The automatic starting of a DG and the automatic loading of emergency busses is not a mitigating action to any accident previously evaluated in MODES 5 and 6 or during the movement of [recently] irradiated fuel. As a result, the probability or consequences of any accident previously evaluated are not affected. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed change eliminates SR 3.8.2.1, Note 2 from the PWR ITS NUREGs and states that SR 3.8.1.12 and SR 3.8.1.19 are not required to be met in MODES 5 and 6 and during movement of [recently] irradiated fuel. The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

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Response: No.

The proposed change eliminates SR 3.8.2.1, Note 2, from the PWR ITS NUREGs and states that SR 3.8.1.12 and SR 3.8.1.19 are not required to be met in MODES 5 and 6 and during movement of [recently] irradiated fuel. Currently, Note 2 excludes SR 3.8.1.12 and SR 3.8.1.19 from ever being applicable. This change eliminates this unnecessary Note and simply states that the SRs are not applicable. The safety functions verified by the SRs are not assumed to be available in the Applicability conditions of the specification. Therefore, this change does not involve a significant reduction in a margin of safety.

Based on the above, the TSTF concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

5.2 Applicable Regulatory Requirements/Criteria

The proposed change eliminates an exception which is not needed. This does not affect any regulatory requirements or criteria.

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the approval of the proposed change will not be inimical to the common defense and security or to the health and safety of the public.

6.0 Environmental Consideration

A review has determined that the proposed change would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed change does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed change.

7.0 References

None

Revision History

OG Revision 0

Revision Status: Closed

Revision Proposed by: Virginia Power

Revision Description:

Original Issue

02-Jun-02

OG Revision 0

Revision Status: Closed

Owners Group Review Information

Date Originated by OG: 08-Dec-99

Owners Group Comments:

Approved on 12/9/1999. Superseded by Revision 2 version.

Owners Group Resolution: Superseded Date: 27-May-01

OG Revision 1

Revision Status: Active

Next Action: NRC

Revision Proposed by: Dominion

Revision Description:

Remark change on Revision 2 pages. Created an SE quality justification.

Owners Group Review Information

Date Originated by OG: 27-May-01

Owners Group Comments:

(No Comments)

Owners Group Resolution: Approved Date: 18-Jul-01

TSTF Review Information

TSTF Received Date: 01-Nov-01

Date Distributed for Review: 14-Jan-02

OG Review Completed: BWOG WOG CEOG BWROG

TSTF Comments:

(No Comments)

TSTF Resolution: Approved Date: 05-Feb-02

NRC Review Information

NRC Received Date: 03-Jun-02

Affected Technical Specifications

SR 3.8.2.1 AC Sources - Shutdown

SR 3.8.2.1 Bases AC Sources - Shutdown

02-Jun-02

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
	B.4 Initiate action to restore required DG to OPERABLE status.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.8.2.1</p> <p style="text-align: center;">- NOTES -</p> <p>1. The following SRs are not required to be performed: SR 3.8.1.3, SR 3.8.1.9 through SR 3.8.1.11, SR 3.8.1.13 through SR 3.8.1.16, [SR 3.8.1.18] and SR 3.8.1.19.</p> <p>2. SR 3.8.1.12 and SR 3.8.1.19 are not required to be met when associated ECCS subsystem(s) are not required to be OPERABLE per LCO 3.5.3, "ECCS-Shutdown."</p> <p>For AC sources required to be OPERABLE, the SRs of Specification 3.8.1, "AC Sources - Operating," except SR 3.8.1.8, SR 3.8.1.17, and SR 3.8.1.20, are applicable.</p>	<p>In accordance with applicable SRs</p>

SR 3.8.1.12,

SR 3.8.1.19,

BASES

ACTIONS (continued)

Introduction of coolant inventory must be from sources that have a boron concentration greater than that what would be required in the RCS for minimum SDM or refueling boron concentration. This may result in an overall reduction in RCS boron concentration, but provides acceptable margin to maintaining subcritical operation. Introduction of temperature changes including temperature increases when operating with a positive MTC must also be evaluated to ensure they do not result in a loss of required SDM.

Suspension of these activities does not preclude completion of actions to establish a safe conservative condition. These actions minimize the probability or the occurrence of postulated events. It is further required to immediately initiate action to restore the required AC sources and to continue this action until restoration is accomplished in order to provide the necessary AC power to the unit safety systems.

The Completion Time of immediately is consistent with the required times for actions requiring prompt attention. The restoration of the required AC electrical power sources should be completed as quickly as possible in order to minimize the time during which the unit safety systems may be without sufficient power.

Pursuant to LCO 3.0.6, the Distribution System's ACTIONS are not entered even if all AC sources to it are inoperable, resulting in de-energization. Therefore, the Required Actions of Condition A are modified by a Note to indicate that when Condition A is entered with no AC power to any required ESF bus, the ACTIONS for LCO 3.8.10 must be immediately entered. This Note allows Condition A to provide requirements for the loss of the offsite circuit, whether or not a train is de-energized. LCO 3.8.10 provides the appropriate restrictions for the situation involving a de-energized train.

SURVEILLANCE
REQUIREMENTSSR 3.8.2.1

SR 3.8.1.12 and SR 3.8.1.19 are not required to be met because the ESF actuation signal is not required to be OPERABLE.

SR 3.8.2.1 requires the SRs from LCO 3.8.1 that are necessary for ensuring the OPERABILITY of the AC sources in other than MODES 1, 2, 3, and 4. SR 3.8.1.8 is not required to be met since only one offsite circuit is required to be OPERABLE. SR 3.8.1.6 is not required to be met because the required OPERABLE DG(s) is not required to undergo periods of being synchronized to the offsite circuit. SR 3.8.1.9 is excepted because starting independence is not required with the DG(s) that is not required to be OPERABLE.

BASES

SURVEILLANCE REQUIREMENTS (continued)

This SR is modified by ~~two~~ ^{the} Notes. The reason for Note 1 is to preclude requiring the OPERABLE DG(s) from being paralleled with the offsite power network or otherwise rendered inoperable during performance of SRs, and to preclude deenergizing a required 4160 V ESF bus or disconnecting a required offsite circuit during performance of SRs. With limited AC sources available, a single event could compromise both the required circuit and the DG. It is the intent that these SRs must still be capable of being met, but actual performance is not required during periods when the DG and offsite circuit is required to be OPERABLE. Refer to the corresponding Bases for LCO 3.8.1 for a discussion of each SR. Note 2 states that SRs 3.8.1.12 and 3.8.1.19 are not required to be met when its associated ECCS subsystem(s) are not required to be OPERABLE. These SRs demonstrate DG response to an ECCS signal (either alone or in conjunction with a loss-of-power signal). This is consistent with the ECCS instrumentation requirements that do not require the ECCS signals when the ECCS System is not required to be OPERABLE per LCO 3.5.3, "ECCS-Shutdown."

REFERENCES

None.

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
	B.4 Initiate action to restore required DG to OPERABLE status.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.8.2.1</p> <p style="text-align: center;">- NOTES -</p> <p>1. The following SRs are not required to be performed: SR 3.8.1.3, SR 3.8.1.9 through SR 3.8.1.11, SR 3.8.1.13 through SR 3.8.1.16, [SR 3.8.1.18] and SR 3.8.1.19.</p> <p>2. SR 3.8.1.12 and SR 3.8.1.19 are not required to be met when associated ECCS subsystems(s) are not required to be OPERABLE per LCO 3.5.3, "ECCS-Shutdown."</p> <p>For AC sources required to be OPERABLE, the SRs of Specification 3.8.1, "AC Sources - Operating," except SR 3.8.1.8, SR 3.8.1.17, and SR 3.8.1.20, are applicable.</p>	<p>In accordance with applicable SRs</p>

SR 3.8.1.12,

SR 3.8.1.19,

BASES

ACTIONS (continued)

Introduction of coolant inventory must be from sources that have a boron concentration greater than that what would be required in the RCS for minimum SDM or refueling boron concentration. This may result in an overall reduction in RCS boron concentration, but provides acceptable margin to maintaining subcritical operation. Introduction of temperature changes including temperature increases when operating with a positive MTC must also be evaluated to ensure they do not result in a loss of required SDM.

Suspension of these activities does not preclude completion of actions to establish a safe conservative condition. These actions minimize the probability or the occurrence of postulated events. It is further required to immediately initiate action to restore the required AC sources and to continue this action until restoration is accomplished in order to provide the necessary AC power to the unit safety systems.

The Completion Time of immediately is consistent with the required times for actions requiring prompt attention. The restoration of the required AC electrical power sources should be completed as quickly as possible in order to minimize the time during which the unit safety systems may be without sufficient power.

Pursuant to LCO 3.0.6, the Distribution System's ACTIONS would not be entered even if all AC sources to it are inoperable, resulting in de-energization. Therefore, the Required Actions of Condition A are modified by a Note to indicate that when Condition A is entered with no AC power to any required ESF bus, the ACTIONS for LCO 3.8.10 must be immediately entered. This Note allows Condition A to provide requirements for the loss of the offsite circuit, whether or not a train is de-energized. LCO 3.8.10 would provide the appropriate restrictions for the situation involving a de-energized train.

SURVEILLANCE
REQUIREMENTS

SR 3.8.2.1

SR 3.8.1.12 and
SR 3.8.1.19 are
not required to
be met because
the ESF actuation
signal is not required
to be OPERABLE.

SR 3.8.2.1 requires the SRs from LCO 3.8.1 that are necessary for ensuring the OPERABILITY of the AC sources in other than MODES 1, 2, 3, and 4. SR 3.8.1.8 is not required to be met since only one offsite circuit is required to be OPERABLE. SR 3.8.1.17 is not required to be met because the required OPERABLE DG(s) is not required to undergo periods of being synchronized to the offsite circuit. SR 3.8.1.20 is excepted because starting independence is not required with the DG(s) that is not required to be operable.

BASES

SURVEILLANCE REQUIREMENTS (continued)

This SR is modified by ^(a)two Notes. The reason for Note ^(the)1 is to preclude requiring the OPERABLE DG(s) from being paralleled with the offsite power network or otherwise rendered inoperable during performance of SRs, and to preclude deenergizing a required 4160 V ESF bus or disconnecting a required offsite circuit during performance of SRs. With limited AC sources available, a single event could compromise both the required circuit and the DG. It is the intent that these SRs must still be capable of being met, but actual performance is not required during periods when the DG and offsite circuit is required to be OPERABLE. Refer to the corresponding Bases for LCO 3.8.1 for a discussion of each SR. Note 2 states that SRs 3.8.1.12 and 3.8.1.19 are not required to be met when its associated ECCS subsystem(s) are not required to be OPERABLE. These SRs demonstrate the DG response to an ECCS signal (either alone or in conjunction with a loss-of-power signal). This is consistent with the ECCS instrumentation requirements that do not require the ECCS signals when the ECCS System is not required to be OPERABLE per LCO 3.5.3, "ECCS-Shutdown."

REFERENCES None.

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
	B.4 Initiate action to restore required DG to OPERABLE status.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.8.2.1</p> <p style="text-align: center;">----- - NOTES - -----</p> <p>1. The following SRs are not required to be performed: SR 3.8.1.3, SR 3.8.1.9 through SR 3.8.1.11, SR 3.8.1.13 through SR 3.8.1.16, [SR 3.8.1.18] and SR 3.8.1.19</p> <p>2. SR 3.8.1.12 and SR 3.8.1.19 are not required to be met when associated ECCS subsystems(s) are not required to be OPERABLE per LCO 3.5.3, "ECCS-Shutdown."</p> <p>For AC sources required to be OPERABLE, the SRs of Specification 3.8.1, "AC Sources - Operating," except SR 3.8.1.8, SR 3.8.1.17, and SR 3.8.1.20, are applicable.</p>	<p>In accordance with applicable SRs</p>

SR 3.8.1.12,

SR 3.8.1.19,

BASES

ACTIONS (continued)

Introduction of coolant inventory must be from sources that have a boron concentration greater than that what would be required in the RCS for minimum SDM or refueling boron concentration. This may result in an overall reduction in RCS boron concentration, but provides acceptable margin to maintaining subcritical operation. Introduction of temperature changes including temperature increases when operating with a positive MTC must also be evaluated to ensure they do not result in a loss of required SDM.

Suspension of these activities does not preclude completion of actions to establish a safe conservative condition. These actions minimize the probability or the occurrence of postulated events. It is further required to immediately initiate action to restore the required AC sources and to continue this action until restoration is accomplished in order to provide the necessary AC power to the unit safety systems.

The Completion Time of immediately is consistent with the required times for actions requiring prompt attention. The restoration of the required AC electrical power sources should be completed as quickly as possible in order to minimize the time during which the unit safety systems may be without sufficient power.

Pursuant to LCO 3.0.6, the Distribution System's ACTIONS are not entered even if all AC sources to it are inoperable, resulting in de-energization. Therefore, the Required Actions of Condition A are modified by a Note to indicate that when Condition A is entered with no AC power to any required ESF bus, the ACTIONS for LCO 3.8.10 must be immediately entered. This Note allows Condition A to provide requirements for the loss of the offsite circuit, whether or not a train is de-energized. LCO 3.8.10 provides the appropriate restrictions for the situation involving a de-energized train.

SURVEILLANCE
REQUIREMENTSSR 3.8.2.1

SR 3.8.2.1 requires the SRs from LCO 3.8.1 that are necessary for ensuring the OPERABILITY of the AC sources in other than MODES 1, 2, 3, and 4. SR 3.8.1.8 is not required to be met since only one offsite circuit is required to be OPERABLE. SR 3.8.1.17 is not required to be met because the required OPERABLE DG(s) is not required to undergo periods of being synchronized to the offsite circuit. SR 3.8.1.20 is excepted because starting independence is not required with DG(s) that are not required to be OPERABLE.

*SR 3.8.1.12 and
SR 3.8.1.19 are not
required to be met
because the ESF
actuation signal is
not required to be
OPERABLE.*

BASES

SURVEILLANCE REQUIREMENTS (continued)

This SR is modified by ~~two~~² Notes. The reason for Note ~~1~~^{the} is to preclude requiring the OPERABLE DG(s) from being paralleled with the offsite power network or otherwise rendered inoperable during performance of SRs, and to preclude deenergizing a required 4160 V ESF bus or disconnecting a required offsite circuit during performance of SRs. With limited AC Sources available, a single event could compromise both the required circuit and the DG. It is the intent that these SRs must still be capable of being met, but actual performance is not required during periods when the DG and offsite circuit is required to be OPERABLE. Refer to the corresponding Bases for LCO 3.8.1 for a discussion of each SR. Note 2 states that SRs 3.8.1.12 and 3.8.1.19 are not required to be met when its associated ECCS subsystem(s) are not required to be OPERABLE. These SRs demonstrate the DG response to an ECCS signal (either alone or in conjunction with a loss-of-power signal). This is consistent with the ECCS instrumentation requirements that do not require the ECCS signals when the ECCS System is not required to be OPERABLE per LCO 3.5.3, "ECCS-Shutdown."

REFERENCES

None.