

Pilgnm Nuclear Power Station 600 Rocky Hill Road Plymouth, MA 02360

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Mike Bellamy Site Vice President

October 10 **,** 2002

U.S. Nuclear Regulatory Commission Attention: Document Control Desk Washington, D.C. 20555

SUBJECT: Entergy Nuclear Operations, Inc. Pilgrim Nuclear Power Station Docket No. 50-293 License No. DPR-35

> Request for Technical Specification Change Concerning Change of Trip Level Settings, Calibration Frequencies, and Editorial Changes, Revision 1

REFERENCE: Entergy Letter No. 2.01.086, Request for Technical Specification Change Concerning Change of Trip Level Settings, Calibration Frequencies, and Editorial Changes, dated December 12, 2001.

LETTER NUMBER: 2.02.084

Dear Sir or Madam:

By the above reference, Pilgrim Nuclear Power Station (Pilgrim) requested NRC review and approval of changes to Pilgrim's Technical Specification Tables 3.2.A, 3.2.B, 4.2.A, and 4.2.B in accordance with 10 CFR 50.90. Subsequent discussions with the NRC staff have identified changes needed in the submittal to support the NRC's review. This letter provides the information discussed with the NRC Staff and replaces the original submittal.

If you have any questions or require additional information, please contact Mr. Bryan Ford, Licensing Manager, at (508) 830-8403.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the $10th$ day of $0ctober$, 2002.

Sincerely,

M. Blay

Robert M. Bellamy

- Attachment 1: Narrative on Proposed Changes and "No Significant Hazards Consideration" (9 - pages)
- Attachment 2: Marked-up Technical Specification Pages (9 pages)

Attachment 3: Calculation Methodology Information (4 - pages)

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Attachment 5: Summary of Regulatory Commitments (1 - page)

Entergy Nuclear Operations, Inc. Pilgrim Nuclear Power Station

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ATTACHMENT 1

NARRATIVE ON PROPOSED CHANGES AND "NO SIGNIFICANT HAZARDS CONSIDERATION"

ATTACHMENT 1

Description of Proposed Changes

- 1) Pilgrim Nuclear Power Station (Pilgrim) proposes the following changes to Technical Specification Table 3.2.A, *"Instrumentation That Initiates Primary Containment Isolation"* (page 3/4.2-7).
	- a) The current trip level setting for the "Main Steam Line Tunnel Exhaust Duct High Temperature" is $\leq 170^{\circ}$ F. Pilgrim proposes to change the trip level setting to $<$ 175 $^{\circ}$ F.
	- b) The trip level setting of the "Turbine Basement Exhaust Duct High Temperature" is currently $\leq 150^{\circ}$ F. Pilgrim proposes to change the trip level setting to \leq 155° F.
	- c) The name of the instrument *"Reactor Cleanup System High Flow"* is changed to *"Reactor Water Cleanup System (RWCU) High Flow."*
	- d) The trip level setting of the "Reactor Water Cleanup System High Temperature" is currently $\leq 150^{\circ}$ F. Pilgrim proposes to change the trip level setting to \leq 148 $^{\circ}$ F. The number of required channels is corrected to identify the sensors and their locations consistent with plant design and to show that there is one required channel in each of the two trip systems for each location. The sensors and their locations are as follows:

"RWCU Back Wash Receiver Tank Room High Temperature" "RWCU Heat Exchanger and Pump Rooms High Temperature" "RWCU Line in RHR Valve Room "A" High Temperature" "RWCU Line Near East CRD Modules High Temperature"

- e) The column identifying the number of available channels is removed from the table.
- 2) Pilgrim proposes the following changes to Technical Specification Table 3.2.B, *"Instrumentation That Initiates or Controls the Core and Containment Cooling Systems"* (pages 3/4.2-12, 3/4.2-16, and 3/4.2-17).
	- a) Not used.
	- b) Not used.
	- c) The trip level settings of the "RCIC Turbine Compartment Wall" is currently \leq 170° F. Pilgrim proposes to change the trip level setting to \leq 168° F.
	- d) The "Torus Cavity Exhaust Duct" is renamed "RCIC Exhaust Duct Torus Cavity." The trip level setting of the "RCIC Exhaust Duct Torus Cavity" is currently \leq 150° F. Pilgrim proposes to change the trip level setting to \leq 148° F.
	- e) The trip level setting of the "RCIC Valve Station Area Wall" is currently \leq 200 \degree F. Pilgrim proposes to change the trip level setting to **51980** F.
- f) The "RCIC" Steam Line Lo-Press" is renamed "RCIC Steam Line Low Pressure". The current trip level setting for the "RCIC Steam Line Low Pressure" trip level setting is $100 > P > 50$ psig. The new trip level setting is proposed to be 77 > P **>** 63 psig.
- g) The current trip level setting of the "HPCI Turbine Steam Line High Flow" is \leq 300% of rated flow. Pilgrim proposes to change the trip level setting to \leq 296% of rated flow.
- h) The "HPCI Turbine Compartment Exhaust Ducts" is renamed "HPCI Turbine Compartment Exhaust Duct." The trip level settings of the "HPCI Turbine Compartment Exhaust Duct" is currently $\leq 170^{\circ}$ F. Pilgrim proposes to change the trip level setting to $\leq 168^{\circ}$ F.
- i) The "Torus Cavity Exhaust Duct" for HPCI is renamed "HPCI Exhaust Duct Torus Cavity." The current trip level setting for the "HPCI Exhaust Duct Torus Cavity" high temperature is 190° F - 200° F. Pilgrim proposes to change the trip level setting of this trip function to $\leq 198^\circ$ F.
- j) The current trip level setting for the "HPCI/RHR Valve Station Area Exhaust Duct" high temperature is currently $\leq 170^{\circ}$ F. Pilgrim proposes to change the trip level settings of these trip functions to $\leq 168^{\circ}$ F.
- k) Table 3.2.B footnote 6 (page 3/4.2-17) is added regarding the trip level setting for the RCIC steam line low-pressure trip function. The footnote clarifies that the pressure indicated for the trip level setting, 70 **±** 7 psig, does not include the static head pressure which is 17.5 psi.
- **1)** Pilgrim proposes to move the note numbers on page 3/4.2-16 to the "Remarks" column to correct the numbers' misplacement.
- 3) Pilgrim proposes the following change to Technical Specification Table 4.2.A, *"Minimum Test and Calibration Frequency for PCIS"* (page 3/4.2-31 and 3/4.2-41).
	- a) The current calibration frequency of the "Main Steam High Temp" is "Once/3 months". Pilgrim proposes to change the calibration frequency to "Once/24 months".
	- b) The "Reactor Water Cleanup High Flow" on Table 4.2.A is renamed "Reactor Water Cleanup System (RWCU) High Flow **".** The "Reactor Water Cleanup High Temp" on Table 4.2.A is changed to the following to reflect the change made to Table 3.2.A (see 1d):

"RWCU Back Wash Receiver Tank Room High Temperature" "RWCU Heat Exchanger and Pump Rooms High Temperature" "RWCU Line in RHR Valve Room "A" High Temperature" "RWCU Line Near East CRD Modules High Temperature"

The current calibration frequency for the "Reactor Water Cleanup High Temperature" is "Once/3 months." Pilgrim proposes to change the calibration frequency to "Once/24 months".

c) Reference to Figure 4.1.1 in Note 1 on "Notes for Tables 4.2.A through 4.2.G (page 3/4.2-41)" is changed to reference the correct figure (Figure 4.2.1).

- 4) Pilgrim proposes the following changes to Technical Specifications Table 4.2.B, "Minimum Test and Calibration Frequency for CSCS" (pages 3/4.-32 and 3/4.2-33).
	- a) Not used.
	- b) The current calibration frequency of the "Steam Line High Temp. (HPCI & RCIC)" is "Once/3 months". Pilgrim proposes to change the calibration frequency to "Once/24 months".
	- c) The current calibration frequency of the "Safeguards Area High Temperature" is "Once/3 months". Pilgrim proposes to change the calibration frequency to "Once/24 months".
	- d) The current calibration frequency for the "RCIC Steam Line Low Pressure" is "Once/3 months". Pilgrim Station proposes to change the calibration frequencies for these instrument channels to "Once/12 months".
- 5) Following approval of the proposed Technical Specification changes Pilgrim will make the following changes to Technical Specifications Bases in accordance with Technical Specification 5.6.6 (Technical Specifications Bases Control Program).
	- a) Pilgrim proposes the following changes to Technical Specification Bases 3.2 "Protective Instrumentation" (page B3/4.2-2):

The current setting of 170° F for the main steam line tunnel detector is low enough to detect leaks on the order of $5 - 10$ gpm. Pilgrim proposes to change the trip value to 175° F for the "main steam line tunnel detector," which is low enough to detect leaks of ≥ 20 gpm.

- b) Pilgrim proposes the following changes to Technical Specification Bases 3.2 "Protective Instrumentation" (page B3/4.2-3).
	- i) The current setting of \leq 300% of design flow for HPCI high flow and 2000 F or **1700** F, depending on sensor location, for HPCI high temperature require revision. Pilgrim proposes to change the HPCI high flow trip value to \leq 296% and HPCI high temperature sensors to \leq 198° F or \leq 168° F, depending on sensor location.
	- ii) The current setting for RCIC area high temperature is 200° F, 170° F, or **1500** F, depending on sensor location. Pilgrim proposes to change the RCIC high temperature sensor trip setting to ≤ 198° F, ≤ 168° F, or \leq 148 $^{\circ}$ F, depending on sensor location.
	- iii) The current Bases description of the RWCU system temperature and high flow instrumentation is changed by substituting the phrase"... is arranged with one instrument in each trip system for each area" for the current "... are arranged similar as that for the HPCI."

The revision of the submittal adds additional information that was identified as needed during discussions with the NRC staff and removes the changes previously requested as items 2.a, 2.b, and 4.a.

Reason for Proposed Change

Pilgrim station proposes setpoint changes to incorporate the results of setpoint calculations and decreased calibration frequencies associated with existing instruments, without adversely affecting instrument reliability. The changes also enhance the usability of the Technical Specifications by providing a clearer description of the "RWCU High Temperature" trip configuration. Changing the names of certain trips gives clearer definition of the system and is editorial. Moving the note numbers is editorial and is done for consistency. Correcting the mis-referenced figure is administrative.

These changes will have the affect of improving the usability of the Technical Specifications, decreasing plant staff burden, and reduces radiological dose.

Safety Evaluation

The functions affected by the proposed changes provide isolation signals to isolate non-limiting leaks from piping outside of containment. These instruments do not have a design basis safety function. Other functions provide the required isolation during design basis accidents.

To support the requested Technical Specification changes Pilgrim analyzed the associated setpoint and calibration frequency changes using the following methodology:

- 1. Proposed instrument setpoint changes (changes la, **1b, Ild,** 2c, 2d, 2e, 2f, 2g, 2h, 2i, 2j) were determined following the guidance of Regulatory Guide 1.105, Revision 2. This is a more recent and rigorous methodology than the original license and design bases for these instruments. As a result, the setpoints for the associated instruments are more conservative than the original setpoints. The trip level settings were determined while analyzing the instruments in accordance with procedures that are subject to a quality assurance program that complies with 10 CFR 50 Appendix B and were found to be acceptable for the reasons described below. The analyses supporting the setpoint changes are based on a 95% probability limit that the trips would occur before the design basis analytical limit is exceeded. Each instrument has a documented "analytical limit" and an "allowable limit." The setpoint calculations fully document the basis for changes to limits, trip level settings, and calibration frequencies.
- 2. Proposed instrument calibration frequencies (changes 3a, 3b, 4b, 4c, and 4d) were determined following the guidance of Generic Letter 91-04.
- 3. The new calculated instrument setpoints were evaluated against the original associated analysis assumptions. The original associated analysis assumptions correspond to the nominal setpoints originally identified in the Technical Specifications for these instruments. When possible, the original associated analysis assumptions are maintained and the proposed instrumentation setpoints support these analysis assumptions (changes **1** d, 2c, 2d, 2e, 2f, 2g, 2h, 2i, 2j).
- 4. Applying the more rigorous setpoint methodology to the original analysis assumptions resulted in inadequate margins to support plant operational needs (e.g., potential for spurious actuations). The associated analysis was revised to provide necessary margin (changes 1a and 1b). The values chosen for the new analysis assumptions were chosen to be high enough to support plant operational needs while being low enough to limit the potential impact of the associated leaks.

Additional information concerning the calculation methodology and selected portions of two of the calculations can be found in Attachments 3 and 4.

The following provides a discussion of the specific changes requested.

The trip level setting for the "Main Steam Line Tunnel Exhaust Duct High Temperature" (1a) is currently $\leq 170^{\circ}$ F. It is proposed that the trip level setting be increased to $\leq 175^{\circ}$ F to support an analytical limit of 178° F. The existing Technical Specification limit of ≤170° F was based on detection and isolation of a 10 gpm leak from the main steam lines inside the main steam tunnel while meeting 10 CFR 20 dose limits. The purpose of this isolation is to limit the release of radiation during a non-limiting leak from the main steam lines, while other systems and functions are designed to address a limiting main steam line break. This isolation is designed to limit dose effects of the analyzed leak to within 10 CFR 20 dose limits and ensure that for leaks smaller than the analyzed leak, it is not credible that dose limits are challenged prior to manually isolating the leak. The new trip setting allows detection and isolation of a main steam line leak of 20 gpm with an associated new analytical limit of **1780** F. Calculations show that 20 gpm of system leakage would be detected and isolated in a timely manner (approximately 1.5 hours). The 20 gpm would need to go undetected for > 1000 days before 10 CFR 20 radiological limits could be exceeded. Such a leak going undetected for such a period is highly unlikely and thus the new setting does not result in consequences that exceed 10 CFR 20 dose limits. There is no impact on environmental qualification of electrical equipment from the potential increase in main steam tunnel temperatures. The new setting ensures adequate margin exists between the trip level setting and the new design basis analytical limit to account for all instrument and process inaccuracies and is high enough to avoid spurious isolation signals. Leaks **<** 20 gpm from adjacent feedwater and RWCU piping inside the main steam tunnel will still be detected by this instrumentation and result in increased area temperature indication in the control room. If the temperature increase persists, actions to identify and isolate these leaks can still be performed as described in the current licensing basis.

The trip level setting for the "Turbine Basement Exhaust Duct High Temperature" **(1** b) is currently $\leq 150^{\circ}$ F. It is proposed that the trip level setting be increased to $\leq 155^{\circ}$ F to support an analytical limit of 158° F. The existing Technical Specification limit of ≤ 150° F was based on detection and isolation of a 150 gpm leak from the main steam lines in the turbine basement while meeting 10 CFR 20 dose limits. The purpose of this isolation is to limit the release of radiation during a non-limiting leak from the main steam lines, while other systems and functions are designed to address a limiting main steam line break. This isolation is designed to limit dose effects of the analyzed leak to within 10 CFR 20 dose limits and ensure that for leaks smaller than the analyzed leak, it is not credible that dose limits are challenged prior to manually isolating the leak. The new trip setting allows detection and isolation of a main steam line leak of 225 gpm with an associated new analytical limit of 158° F. Calculations show that the system leakage would still be detected and isolated in a timely manner (approximately 1.3 hours). The 225 gpm leak would need to continue undetected for > 7 days before 10 CFR 20 radiological limits could be exceeded. Such a leak going undetected for such a period is unlikely and thus the new setting does not result in consequences that exceed 10 CFR 20 dose limits. There is no impact on environmental qualification of electrical equipment from the potential increase in main steam tunnel temperatures. The new setting ensures adequate margin exists between the trip level setting and the new design basis analytical limit to account for all instrument and process inaccuracies and is high enough to avoid spurious isolation signals. Leaks from other piping in the turbine basement will still be detected by this instrumentation. **If** the temperature increase persists, actions to identify and isolate these leaks can still be performed as described in the current licensing basis. Renaming the "Reactor Cleanup System High Flow" to "Reactor Water Cleanup System (RWCU) High Flow" **(1** c, 3b), removing the column identifying the number of available instruments channels (le), and relocating footnote numbers to the "Remarks" column (21) are administrative changes that do not change any technical requirements and do not impact safety.

The trip level setting of the "Reactor Water Cleanup System High Temperature" **(1** d) is currently \leq 150° F. It is proposed that the trip level setting be decreased to \leq 148° F to support an analytical limit of **1500** F for all four sensor locations. High temperature in the vicinity of the reactor water cleanup (RWCU) equipment and piping could indicate a break in a RWCU line. When high temperature occurs near the RWCU equipment, the RWCU system is isolated. This new trip level setting ensures that the analytical limit of **1500** F will not be exceeded and timely detection and isolation of the RWCU system occurs in the event of a RWCU line break. The new trip level setting of <1 **480** F is sufficiently above normal operational upper limits to avoid spurious isolation, yet low enough to provide timely detection of a line break.

The RWCU system high temperature instruments are delineated by instrument location to ensure the appropriate requirements are implemented. The minimum number of instrument channels required to be operable for each location is changed to one in each of 2 trip systems **(1** d). High temperature in the vicinity of the RWCU system is sensed by four sets of two bimetallic temperature switches. A set of two temperature switches is installed in each of the four areas to be monitored. Each of the switches in an area is capable of initiating isolation of its associated valve(s). This change is consistent with plant design as described in the UFSAR and the presentation of this function in NUREG-1433, "Standard Technical Specifications, BWR 3/4."

The trip level setting for the "RCIC Turbine Compartment Wall" (2c) is currently $\leq 170^{\circ}$ F. The proposed trip level setting is < **1680** F to support an analytical limit of **1700** F. The trip level setting for the "RCIC Exhaust Duct Torus Cavity" (2d) is currently $\leq 150^{\circ}$ F. The proposed trip level setting is $\leq 148^{\circ}$ F to support an analytical limit of 150 $^{\circ}$ F. The trip level setting for the "RCIC Valve Station Area Wall" (2e) is currently \leq 200° F. The proposed trip level setting is \leq 198° F to support an analytical limit of 200° F. The new trip level settings for the "RCIC Turbine Compartment Wall" (2c), "RCIC Exhaust Duct Torus Cavity" (2d), and "RCIC Valve Station Area Wall" (2e) are lower. The analytical limits for these setpoints are based on detecting RCIC steam line leaks of approximately 10 gpm and initiating isolation of the RCIC steam line. Calculations conclude that satisfactory margin exists between the trip level settings and the design basis analytical limit to account for all instrument and process inaccuracies. The probability of an inadvertent actuation caused by the decrease in operating margin was evaluated and found to be acceptable; the proposed changes do not increase the probability of an inadvertent actuation based on normal historical operating conditions. The new trip level settings are sufficiently below those for the HPCI system so that preferential isolation of the RCIC steam line occurs in the event of a small line break, and permits the HPCI system to remain operable.

Changing the RCIC "Torus Cavity Exhaust Duct" to "RCIC Exhaust Duct Torus Cavity" (2d) clarifies the instruments' location. This is an administrative change and has no impact on safety. The trip level setting for the "RCIC Steam Line Low Pressure" (2f), is currently 100 > P **>** 50 psig. The proposed trip level setting is 77 > P > 63 psig. The analytical limits (100 > P **>** 50 psig) for the "RCIC Steam Line Low Pressure" (2f) were selected to ensure the RCIC steam line is isolated at a value that ensures steam and radioactive gases will not escape from the RCIC turbine shaft seals into the reactor building after steam pressure has decreased to such a low value that the turbine can not be operated. The proposed trip level setting of 77 > P **>** 63 psig, by taking into account total instrument loop uncertainty, ensures steam line isolation occurs before the analytical limit is exceeded.

The "HPCI Turbine Steam Line High Flow" (2g) trip level setting is currently \leq 300% of rated flow. The proposed trip level setting for the "HPCI Turbine Steam Line High Flow" instruments of < 296% is more conservative than the current setting because it isolates HPCI at a slightly lower flow, thereby increasing the margin between the trip level setting and the analytical limit of

300%. The new trip level setting is closer to the normal operating band but it has been determined that adequate operating margin exists. This change does not adversely impact HPCI performance.

The trip level setting for the "HPCI Turbine Compartment Exhaust Duct" (2h) is currently \leq 170 $^{\circ}$ F. The proposed trip level setting is \leq 168 $^{\circ}$ F to support an analytical limit of 170 $^{\circ}$ F. The trip level setting for the "HPCI Exhaust Duct Torus Cavity" (2i) is currently 190° F - 200° F. The proposed setting is ≤ 198° F to support an analytical limit of 200° F with the removal of the bottom of the band for the isolation. The lower end of the current band is to preserve system availability by establishing a setting high enough to preclude spurious isolations. However, this lower setting point is not assumed in the accident analysis and therefore, is removed from the Technical Specifications.

The trip level setting for the "HPCI/RHR Valve Station Area Exhaust Duct" (2j) is currently \leq 170° F. The proposed trip level setting is \leq 168° F to support an analytical limit of 170° F. The new trip level settings for the "HPCI Turbine Compartment Exhaust Duct" (2h), "HPCI Exhaust Duct Torus Cavity" (2i), and "HPCI/RHR Valve Station Area Exhaust Duct" (2j) are lower. The analytical limits for these setpoints are based on detecting HPCI steam line leaks of approximately 10 gpm and initiating isolation of the HPCI steam line. Decreasing the trip level settings will slightly improve the ability of the instrumentation to detect and isolate steam leaks. Calculations conclude that satisfactory margin exists between the trip level settings and the design basis analytical limit to account for all instrument and process inaccuracies. The probability of an inadvertent actuation caused by the decrease in operating margin was evaluated and found to be acceptable; thus the proposed changes do not increase the probability of an inadvertent actuation based on normal historical operating conditions.

Renaming the "HPCI Turbine Compartment Exhaust Ducts" to "HPCI Turbine Exhaust Duct" (2h) is editorial and does not impact safety.

Renaming the "Torus Cavity Exhaust Duct" to "HPCI Exhaust Duct Cavity"(2i), clarifies the instrument's location. This is an administrative change and has no impact on safety.

The addition of Note 6 (2k) provides information concerning the presence of 17.5 psi static head due to the difference in elevation between the location of the sensing lines attached to the RCIC steam line and the location of the pressure sensing instrument. The note is intended to clarify that the trip level setting is based on the pressure in the steam line (process pressure) rather than instrument sensed pressure. Adding Note 6 is an administrative change and has no impact on safety.

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Calibration frequencies are decreased for the "Main Steam High Temp" (3a), and the renamed "Reactor Water Cleanup High Temp" (3b) systems, the "Steamline High Temp (HPCI & RCIC)" (4b), the "Safeguards Area High Temperature" (4c), and the "RCIC Steam Line Low Pressure" (4d). The effect on total instrument loop uncertainty due to decreasing the calibration frequencies were included in the calculations that established the new Technical Specification trip settings in accordance with methodologies endorsed by R.G. 1.105. The calculations conclude that sufficient margin exists between the trip level settings and the design basis analytical limit to account for all instrument and process inaccuracies, including decreased calibration frequencies. Therefore, the decreased calibration frequencies will have no effect on the ability of the affected instrumentation to perform their safety functions. Note 1 of "Notes for Tables 4.2.A through 4.2.G" is changed to reference Figure 4.2-1 instead of the currently referenced Figure 4.1.1 (3c). This change corrects an oversight that occurred when the reformatting of Technical Specifications granted by Revision 177 renamed the Figure as Figure 4.2-1, but Note 1 was not changed. The content of Figure 4.2-1 is identical to the previous Figure 4.1.1; therefore, this is an administrative change.

Environmental Consideration

The proposed amendment changes instrument surveillance intervals and trip level settings. The proposed change is consistent with accepted engineering practice and methodologies.

The proposed change does not impact plant configuration or design. Each proposed change is to be used within the restricted area as defined in 10 CFR Part 20. Pilgrim has determined the amendment involves no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite, and there is no significant increase in individual or cumulative occupational radiation exposure resulting from the implementation of this proposed change. Pilgrim has performed a no significant hazards consideration analysis (see below) and found the proposed amendment involves no significant hazards. Accordingly, Pilgrim concludes the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR Part 51.22(c)(9). Therefore, pursuant to 10 CFR Part 51.22(b), Pilgrim concludes no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

No Significant Hazards Considerations

10 CFR 50.91 requires that at the time a licensee requests an amendment, it must provide to the Commission its analysis using the standards in 10 CFR 50.92, to determine no significant hazards considerations. In accordance with 10 CFR 50.91, Pilgrim has performed an analysis for the proposed changes to Technical Specification Tables 3.2.A and 3.2.B and 4.2.A and 4.2.B. Operation of Pilgrim in accordance with the proposed amendment:

• Will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The methodology used to determine the proposed trip level settings and surveillance intervals ensure adequate performance of the affected instrumentation. In addition, the affected instruments are not initiators of any accident previously evaluated. Therefore, the proposed trip level settings and surveillance intervals will not involve a significant increase in the probability of an accident previously evaluated.

The proposed changes to trip level settings and surveillance intervals were established using methodologies subject to a 10 CFR Appendix B Quality Assurance program and ensure existing radiological limits are met. Therefore, the proposed trip level settings and surveillance intervals will not involve a significant increase in the consequences of an accident previously evaluated.

Other changes are editorial or administrative in nature and can not significantly increase the probability or consequences of an accident previously evaluated.

Will not create the possibility of a new or different kind of accident from any accident previously evaluated.

No new or different types of accidents or malfunctions than those previously analyzed in Pilgrim's UFSAR are introduced by this proposed change because there are no new failure modes introduced. Therefore, the proposed changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

Will not involve a significant reduction in the margin of safety. \bullet

The proposed changes to trip level settings and surveillance intervals were established using approved methodologies subject to a 10 CFR, Appendix B, Quality Assurance program and existing radiological limits are met. These changes do not impact Pilgrim's configuration or operation.

Editorial and administrative type changes do not impact the operation or configuration of Pilgrim. For the above reasons the proposed change does not result in a significant reduction in the margin of safety.

Schedule of Change

This change will be implemented within 90 days following Pilgrim's receipt of NRC approval.

ATTACHMENT 2

MARKED UP TECHNICAL SPECIFICATION PAGES

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Amendment No. 0;-148

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NOTES FOR TABLE **3`6** 2. B

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- 1. Whenever any CSCS subsystem is required by Section 3.5 to be operable, there shall be two (Note 5) operable trip systems. If the first column cannot be met for one of the trip systems, that system shall be repaired or the reactor shall be placed in the Cold Shutdown Condition within 24 hours after this trip system is made or found to be inoperable.
	- 2. Close isolation valves in RCIC subsystem.
	- Close isolation valves in **H2CI** subsystem. $\overline{3}$.
	- **1.** Instrument set point corresponds to 79.96 inches above top of active fuel.
	- 5. RCIC has only one tri? system for these sensors.
	- $6.$ DOES NOT INCLUDE STATIC HEAD OF 17.5 ps:

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Amendment No. 198, -142, -151

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PNPS **TABLE 4.2.A**

MINIMUM TEST AND CALIBRATION FREQUENCY FOR PCIS

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 $4.2 - 31$

PNPS TABLE 4.2.B

MINIMUM TEST AND CALIBRATION FREQUENCY FOR CSCS MINIMUM TEST AND CALIBRATION F

Revision-177 2 - 1
Amendment No. 42;-61;-99;-148;-151

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PNPS TABLE 4.2.B (Cont)

MININUM TEST AND CALIBRATION FREQUENCY FOR CSCS

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Revision-177-C
Amendment No. 42,-61,-99,-148,-151

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NOTES FOR TABLES 4.2.A THROUGH 4.2.G

- 1. Initially once per month until exposure hours (M as defined on Figure $(4.1.1)$) is 2.0 x 10⁵; thereafter, according to Figure/4.1.1) with an interval not less than one month nor more than three months.
- 2. Functional tests, calibrations and instrument checks are not required when these instruments are not required to be operable or are tripped. Functional tests shall be performed before each startup with a required frequency not to exceed once per week. Calibrations of IRMs and SRMs shall be performed during each startup or during controlled shutdowns with a required frequency not to exceed once per week. Instrument checks shall be performed at least once per day during those periods when the instruments are required to be operable.
- 3. This instrumentation is excepted from the functional test definition. The functional test will consist of injecting a simulated electrical signal into the measurement channel.
- 4. Simulated automatic actuation shall be performed once each operating cycle. Where possible, all logic system functional tests will be performed using the test jacks.
- 5. Reactor low water level and high drywell pressure are not included on Table 4.2.A since they are tested on Tables 4.1.1 and 4.1.2.
- 6. The logic system functional tests shall include a calibration of time delay relays and timers necessary for proper functioning of the trip systems.
- 7. Calibration of analog trip units will be performed concurrent with functional testing. The functional test will consist of injecting a simulated electrical signal into the measurement channel. Calibration of associated analog transmitters will be performed each refueling outage.

BASES:

3.2 PROTECTIVE INSTRUMENTATION (Cont)

up to the complete circumferential break of a 28-inch recirculation line and With the trip setting given above, CSCS initiation and primary system isolation are initiated in time to meet the above criteria.

The high drywell pressure instrumentation is a diverse signal to the water level instrumentation and in addition to initiating CSCS, it causes isolation
of Group 2 isolation valves. For the breaks discussed above, this
instrumentation will initiate CSCS operation at about the same time as the low isolation valves.

Venturis are provided in the main steam lines as a means of measuring steam flow and also limiting the loss of mass inventory from the vessel during a
steam line break accident. The primary function of the instrumentation is to
detect a break in the main steam line. For the worst case accident, ma steam line break outside the drywell, steam flow trip setting in conjunction with the flow limiters and main steam line valve closure, limits the mass inventory loss such that fuel is not uncovered, fuel temperatures remain
.. approximately 1000'F and release of radioactivity to the environs is well
below 10CFR100 guidelines.

Temperature monitoring instrumentation is provided in the main steam line
tunnel and the turbine basement to detect leaks in these areas. Trips are
provided on this instrumentation and when exceeded, cause closure of isola enoe.
. on this instrumentation and when exceeded, cause closure of isolation
The setting of $\bigoplus_{i=1}^n F$ for the main steam line tunnel detector is low enough to detect le. ing o:
. ks on <mark>i</mark> $\overline{\mathcal{L}}$ he or:
order ber of $\sqrt{6-19}$ gpm; thus, it is capable of
breaks. For large breaks, the high starm flow instrumentation is a backup to the temperature instrumentation.

Pressure instrumentation is provided to close the main steam isolation valves in the RUN mode before the reactor pressure drops below 785 psig. This function is primarily intended to prevent excessive vessel depressuirzation in the event of a malfunction of the nuclear system pressure regulator. This function also provides automatic protection of the low-pressure corepower
neiel safety limit (25% of rated core thermal power for reactor pressure **< 785** In the Refuel or Startup Mode, the inventory loss associated with such a malfunction would be limited by closure of the Main Steam Isolation Valves psig). In the Refuel or Startup Mode, the inventory loss associated with such
a malfunction would be limited by closure of the Main Steam Isolation Valves
due to either high or low reactor water level; no fuel would be unc

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Revision 177 Amendment No. 24; -112; -151; -154

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3.2 PROTECTIVE INSTRUMENTATION (Cont)

The HPCI high flow and temperature instrumentation erg provided to detect a break in the HPGI steam piping. Tripping of this instrumentation results in actuation of HPCI isolation valves. Tripping logic for the high flow is a 1 out of 2 logic, and all sensors are required to be operable.

Temperature is monitored at three (3) locations with four (4) temperature sensors at each location. Two (2) sensors at each location are powered by "A" direct current control bus and two (2) by "B" direct current control bus. Each pair of sensors, e.g., "A" or "B", at each location are physically separated and the tripping of either "A" or "B" bus sensor will actuate HPGI isolation valves. \leq 198) $45/2$ ر 246ع

The trip settings of $\leq \frac{6009}{1000}$ of design flow for high flow and ≤ 0 . For \leq <u> J. E.</u> depending on sensor location, for high temperature are such that core uncovery is prevented and fission product release is within limits. \leq 198) \leq 16 S

The RGIG high flow and temperature instrumentation (execution of the same as For the community of the sensor location, for temperature are based on the same criteria as the HPGI.

The Reactor Water Cleanup System high flow and temperature instrumentation arranged similar as that for the HPGS. The trip settings are such that core uncovery is prevented and fission product release is within limits.

The instrumentation which initiates CSCS action is arranged in a dual bus system. As for other vital instrumentation arranged in this fashion, the Specification preserves the effectiveness of the system even during periods when maintenance or testing is being performed. An exception to this is when logic functional testing is being performed.

The control rod block functions are provided to prevent excessive control rod withdrawal. The trip logic for this function is 1 out of n: e.g., any trip on one of six APRM's, two RMB's, eight IRM's, or four SRM's will result in a rod block.

The minimum instrument channel requirements assure sufficient instrumentation to assure the single failure criteria is met. The minimum instrument channel requirements for the RBM may be reduced by one for not longer than 24 hours without significantly increasing the risk of an inadvertent control rod withdrawal.

Reactor power may be varied by moving control rods or by varying the recirculation flow rate. The APRM system provides a control rod block to prevent red withdrawal beyond a given point; thereby possibly avoiding an APRM Scram. The rod block serpoint is automatically reduced with recirculation flow to form the upper boundary of the PNPS power/flow map. The flow biased APRM rod block is not necessary to prohibit fuel damage and is not included in the analysis of anticipated transients.

Amendment No. 140, 150, 154

 $33/4.2 - 3$

ATTACHMENT 3

CALCULATION METHODOLOGY INFORMATION

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ATTACHMENT 3

A. Application of the Guidance of Generic Letter 91-04

Generic Letter 91-04 provided a methodology for determining and evaluating instrument surveillance intervals. As discussed in the Generic Letter a proposed surveillance interval was acceptable if it met certain requirements.

A setpoint calculation using the same methodology that was used for the proposed changes was submitted to the NRC by letter, dated June 7, 1993. The submittal was made to facilitate NRC review and approval of a 24-month fuel cycle for Pilgrim in accordance with Generic Letter 91-04. The NRC found Pilgrim's method and results acceptable in the NRC's safety evaluation report granting License Amendment 151, dated April 6, 1994, (TAC Nos. M83787, M87191, and M88390). In addition, as requested by the NRC staff, selected portions on two of the calculations associated with this change are included in Attachment 4.

The following is a discussion of the application of the requirements of Generic Letter 91-04 for the proposed calibration frequencies.

1. Confirm that instrument drift as determined by as-found and as-left calibration data from surveillance and maintenance records has not, except on rare occasions, exceeded acceptable limits for a calibration interval.

Discussion

As-found and as-left data for the instruments being evaluated were obtained and the instrument drift for the proposed duration confirmed that the drift supported the requested interval.

As-found and as-left calibration data was collected from calibration records and statistically analyzed to determine drift. Pilgrim looked at the proposed calibration intervals plus a 25% margin (e.g.15 months for yearly calibration intervals and 30 months for 2 year calibration intervals). Pilgrim then evaluated the intervals associated with the device for which no adjustments were required during the entire interval, i.e., the device had not drifted for the entire interval and required no action on the part of the technician.

From the raw data, the shift between calibrations and the interval between calibrations was determined. Mean, standard deviation, and outliers were determined for each set of data. Then, based on the sample size, the appropriate multiplier was determined and utilized to convert the standard deviation value corresponding to 95% probability at a 95% confidence level. Statistical analysis was performed on the data to determine if the data set is normal or bounded by the normal curve. WAPD-TM-1292 (DOE Research and Development Report) "Statistics for Nuclear Engineers and Scientist, Part 1: Basic Statistical Inference" was used to obtain the multiplier to obtain a 95% probability at a 95% confidence level.

2. Confirm that the values of drift for each instrument type (make, model, and range) and application have been determined with a high probability and a high degree of confidence. Provide a summary of the methodology and assumptions used to determine the rate of instrument drift with time based upon historical plant calibration data.

Discussion

The as-found and as-left data were analyzed to ensure that the drift values corresponded to a 95% probability at a 95% confidence level. A detailed discussion of the methodology used is supplied in a Pilgrim letter to the NRC dated June 7,1993. In addition, as requested by the NRC staff, selected portions on two of the calculations associated with this change are included in Attachment 4.

3. Confirm that the magnitude of instrument drift has been determined with a high probability and a high degree of confidence for a bounding calibration interval of 30 months for each instrument type (make, model number, and range) and application that performs a safety function. Provide a list of the channels by TS section that identifies these instrument applications.

Discussion

Attachment **1** in the Description of Proposed Changes section provides a list of the instrument applications affected.

The calculations used existing analytical limits as bounding values for the setpoint analyses. As-found/as-left historical instrument calibration data were statistically analyzed to calculate 95/95% probability and confidence level values. These values were then used in the setpoint calculations. The value determined in this process was considered to include the effects of measurement and test equipment (M&TE), reference or basic component accuracy and other parameters as well as component drift. The rack and sensor setting tolerances were retained. This approach is consistent with the proposed Instrument Society of America (ISA) Recommended Practice (ISA-S67.04-1982, "Setpoints for Nuclear Safety-Related Instrumentation Used in Nuclear Power Plants", including consideration of the 6 items in Section 4.2.1 of the Standard).

The 95% probability at a 95% confidence level values were statistically analyzed to determine if the data sets were normal or bounded by a normal curve.

All uncertainties identified in the calculations were individually evaluated to determine whether they were random or biased. In the context of instrument uncertainty, it is accepted within the industry that random uncertainties are those uncertainties that a manufacturer specifies as having $a + or$ - magnitude. Random uncertainties were combined using the root sum of the squares (RSS) technique. Biases were expressed with either a + or a - sign and were added together separately according to sign. Individual component error terms which contained both a bias and a random value were split up so that the random part was combined with other component error terms, and the biases were added to other component bias terms of the same sign. Both random and bias terms were added together to determine Total Loop Uncertainty (TLU). A random or bias term can also be further classified as being dependent or independent. Two error terms are classified as dependent if they possess a significant correlation, for whatever cause, known or unknown. Instrument proximity or physical connections alone do not cause dependency because the sign of the error term is determined solely by that instrument's measured response to the stimulus (temperature, pressure, etc.). Dependent errors were summed algebraically to form independent errors.

The interval used for the calculations was the proposed calibration interval plus 25% (i.e., 15 months or 30 months).

4. Confirm that a comparison of the projected instrument drift errors has been made with the values of drift used in the setpoint analysis. If this results in revised setpoints to accommodate larger drift errors, provide proposed TS changes to update trip setpoints. If the drift errors result in a revised safety analysis to support existing setpoints, provide a summary of the updated analysis conclusions to confirm that safety limits and safety analysis assumptions are not exceeded.

Discussion

A comparison of projected drift errors was made with the drift values used in the setpoint analysis. The calculations determined setpoints with sufficient margin to ensure at least a 95% probability of achieving the design basis setpoint analytical limit. The cases where the safety analysis assumptions needed to be revised are discussed in Attachment 1 in the Safety Evaluation section.

5. Confirm that the projected instrument errors caused by drift are acceptable for control of plant parameters to effect a safe shutdown with the associated instrumentation.

Discussion

Instrument errors caused by drift were evaluated as part of the process and found to be acceptable as part of the calculation process.

6. Confirm that all conditions and assumptions of the setpoint and safety analyses have been checked and are appropriately reflected in the acceptance criteria of plant surveillance procedures for channel checks, channel functional tests, and channel calibrations.

Discussion

The assumptions of the calculations were validated as required by the applicable setpoint calculation procedures.

7. Provide a summary description of the program for monitoring and assessing the effects of increased calibration surveillance intervals on instrument drift and its effect on safety.

Discussion

Pilgrim commits to a program that consists of monitoring, feedback, and assessment to verify instrument performance, including drift, is consistent with the parameters specified in the calculations for those instruments whose surveillance interval is being increased. Data collected from surveillance procedures will be evaluated to confirm the validity of assumptions supporting the setpoint calculations and the calculations' conclusions. The proposed (revised) setpoints will be evaluated during the first calibration interval(s) to ensure the new setpoints have no adverse impact on plant operations. The extended surveillance intervals will be monitored for three calibration interval(s) to ensure the assumptions in the calculations continue to be valid. If surveillance test results indicate that instrument performance does not meet surveillance

procedure requirements, corrective actions will be taken in accordance with existing station procedures. Changes made as a result of the corrective action will be reflected in the setpoint calculations. Subsequent monitoring will rely on existing plant procedures and controls to ensure continued safe operation of Pilgrim.

B. Calculation Methodology

The methodologies used are in accordance with Regulatory Guide 1.105, Revision 2, ISA-S67.04-1982, and Generic Letter 91-04. A sample setpoint calculation using the same methodology that was used for the proposed changes was submitted to the NRC by letter dated June 7, 1993. The submittal was made to facilitate NRC approval of a 24-month fuel cycle for Pilgrim in accordance with Generic Letter 91-04. The NRC found Pilgrim's method and results acceptable in the NRC's safety evaluation report granting License Amendment 151, dated April 6, 1994, (TAC Nos. M83787, M87191, and M88390). In addition, as requested by the NRC staff, selected portions on two of the calculations associated with this change are included in Attachment 4.

In the calculations, as-found and as-left calibration data was collected from calibration records and statistically analyzed to determine drift. From the raw data, the shift between calibrations and the interval between calibrations was determined. Mean, standard deviation, and outliers were determined for each set of data. Then, based on the sample size, the appropriate multiplier was determined and utilized to convert the standard deviation value corresponding to 95% probability at a 95% confidence level. Statistical analysis was performed on the data to determine if the data set is normal or bounded by the normal curve. WAPD-TM-1292 (DOE Research and Development Report) "Statistics for Nuclear Engineers and Scientist, Part 1: Basic Statistical Inference" was used to obtain the multiplier to obtain a 95/95 confidence level.

All calculations were prepared using this same methodology.

ATTACHMENT 4

PORTIONS OF TWO OF THE ASSOCIATED CALCULATIONS

Pilgrim Calculation No. 1-NI-115

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Pages 2 thru 21 and 24 thru 38

Rev **0** Date 11/21/95

FORM 4. **CALCULATION SHEET**

CALCULATION NUMBER **1-N1-115**

CALCULATION WORK OR REMARKS:

Statement of Problem

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This calculation will provide the uncertainity analysis for the development of the RWCU system
space high temperature group 6 isolation setpoint based on a twenty-four month calibration
frequency. It will determine a plant determined by this calculation are:

- Trip Setpoint
- Technical Specification Allowable Value
- Setpoint Analytical Limit
- Field Reset Value
- Calibration No Adjust Limits
- Instrument Surveillance Interval
- Measurement and Test Equipment Equipment Accuracy

Method of Solution

This calculation is performed based on the methodology described in BECO NEDWI No. 394 and instrument calibration data. The calculation is in accordance with the U.S. NRC Regulatory Guide
No. 1.105, Rev. 2 and Instrument Society of America Standard ISA-S67.04-1982.

Input Data and Assumptions

The RWCU system space high area temperature instruments consists of four sets of two
bimetallic temperature switches. Each set is a one out of two trip system capable of initiating
isolation. The temperature switch sets ar

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CALCULATION NUMBER, **I** -N1- 115

- "• HV duct from the Backwash Receiver Tank Room
- "• HV duct from the RWCU Heat Exchanger Room
- RHR Piping Room
- "* HV duct from the RHR **"A"** Valve Room

Input data and references are listed on Form **1** of this calculation. Any assumptions are identified under the notes section.

Summary of Results and Recommendations

This calculation determined a new instrument setpoint, technical specification allowable value and setpoint calibration frequency. These values were determined based on industry and plant specific calibration data and NEDW the present. The new values determined by this calculation require a plant design change for implementation at PNPS.

Note, the new setpoint allowable value and calibration frequency require a Technical Specification change.

The results of this calculation are listed below:

Trip Setpoint: 138 deg F Technical Specification Allowable Value: ≤148 deg F Setpoint Analytical Limit: ≤150 deg F Setpoint Reset Value: 133 deg F (Typically) No Adjust Limits: **±** 3 deg F Surveillance Interval: Once per 24 months plus 25% M&TE Accuracy: **±** 5 deg F

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Rev $\frac{0}{\sqrt{11}}$ Date $\frac{11}{117/95}$ *Edison* Sheet $\frac{1}{2}$ of $\frac{17}{17}$

FORM 4. CALCULATION SHEET

CALCULATION NUMBER I-NI-115

CALCULATION WORK OR REMARKS:

Notes:

1. The RWCU system space high temperature switches are part of the Primary Containment and
Reactor Vessel Isolation Control System (PCIS). The objective of the PCIS is to provide timely protection against the onset and consequences of accidents (leaks and breaks) involving the gross release of radioactive materials from the fuel and nuclear system process barrier by initiating automatic isolation of appro monitored variables exceed preselected operational limits (FSAR Section 7.3.1). This protects the fuel by limiting losses of reactor coolant and stopping the release of radioactive materials. See FSAR Section 7.3.3 for the PCIS Safety Design Bases.

The safety function of the RWCU system space high temperature instrumentation is to detect high temperature in the vicinity of the RWCU system equipment in excess of its preselected setpoint.
High temperature could indicate a leak or a break in a RWCU system pipe line. The high temperature isolation setting is selected far enough above anticipated normal RWCU system operational levels to avoid spurious isolations, but low enough to provide timely detection of a RWCU line break (FSAR section 7.3.4.7).

2. The Circuit Leakage Allowance is applicable to low energy analog signals only. The RWCU system space high temperature switches are mechanical on/off 120 vac devices. The performance of 120 vac on/off signals are not affected by circuit leakage. Therefore, this error is not applicable.

3. Process Measurement Accuracy for a temperature switch is typically the response time of the sensor. The actual sensor temperature always lags a change in the process temperature which translates to an error in the process setpoint if time is essential in the operation of the switch. Because dynamic effects such as time response are addressed in the plant accident analysis the error associated with sensor response time will not be included in the setpoint calculation.

Also, it is assumed the temperature switches are located at the highest temperature of the room. Therefore, there will not be an error due to sensor location.

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4. The sensor drift was statistically analyzed for a three month interval in attachment no. 2 in accordance with ABB Impell Project Instruction 25-226-PI-001. The analysis used empirical data from 5/18/93 through 5/21/95 obtained from the PNPS as-found as-left instrument calibration records. Reference PNPS Procedure 8.M.2-1.2.2. The drift value determined is .62 **±** 6.27. Also, industry data for the EGS Patel temperature switch was statistically analyzed in attachment no. 3 for a 30 month interval. The drift value determined is 2.22 **±** 7.05. The value obtained from the statistical analysis has a probability and confidence of 95/95%.

The Pilgrim specific drift data for a 3 month interval when compared to industry drift data for a 30 month interval is not significantly different. It is therefore concluded the drift of these switches are not a function of time. Based on this data the calibration interval for these switches is to be extended to 24 months. This calculation will assume drift of TS 1291-14C, D, E, F, G, H, J&K for a 24 month calibration frequency is the value determined from the industry data above.

The as-found as-left calibration data used to determine the drift also includes the error associated with sensor accuracy and measurement and test equipment (M&TE) accuracy. Therefore, the value for the sensor normal accuracy and calibration accuracy is considered to be included in the drift error and will be identified as N/A in this calculation. It is assumed that the accuracy of the M&TE used for calibration is less than or equal to the accuracy of the instrument being calibrated. Reference PNPS Procedure 1.3.36.

5. The Environmental Allowance includes errors due to temperature, radiation, humidity, pressure, and seismic effects. This error is identified in Patel Report PEI-TR-831200-1 in section X-2.3.2.1. The accuracy of the switches tested remained within the **±** 6 deg F acceptance criteria throughout the entire test program without any adjustments. The environmental conditions for TS-1291-14C, TS-1291-14D, TS-1291-14E, TS-1291-14F, TS-1291-14G, TS-1291-14H, TS-1291-14J and TS 1291-14K applications are identified in Boston Edison Co. Environmental Qualification Evaluation Sheets. The conditions of the Patel test program envelope both the normal and accident environment at PNPS. Therefore, the Environmental Allowance of TS-1291-14C, TS-1291-14D, TS-1291-14E, TS-1291-14F, TS-1291-14G, TS-1291-14H, TS-1291-14J and TS-1291-14K is considered to include all the above effects.

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FORM 4. CALCULATION SHEET

CALCULATION NUMBER **I-N1-115**

6. From the as-found as-left calibration data (reference PNPS Procedure 8.M.2-1.2.2) the reset differential for the EGS Patel temperature switch, model no. 01-170020-090 is typically less than 5 deg F. Therefore the reset value is typically greater than 133 deg F.

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Calculation Number_I-N1-115 Instrument Number_TS-1291-14C thru k

FORM 1 INSTRUMENT DATA Page 1 of 9

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Calculation Numberl-N1-115 Instrument NumberTS-1291-14C thru k

FORM 1 INSTRUMENT DATA Page 2 of 9

DATE_1 1/21/95 SHEET **9** OF 4-7 REV 0

Calculation Number__l-N1-115 Instrument NumberTS-1291-14C thru k

FORM 1 INSTRUMENT DATA Page 3 of 9

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Calculation Number__lI-NI **- _115** Instrument NumberTS-1291-14C thru k

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Calculation Number__l-NI *-_115* Instrument NumberTS-1291-14C thru k

FORM 1 INSTRUMENT DATA Page 5 of 9

Calculation Number__l-N1-115 Instrument NumberTS-1291-14C thru k

FORM 1 INSTRUMENT DATA Page 6 of 9

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FORM 1 INSTRUMENT DATA Page 7 of 9

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Calculation Number__I-N1-115 Instrument NumberTS-1291-14C thru k

Calculation Number__I-N1-115_ Instrument NumberTS-1291-14C thru k

FORM 1 INSTRUMENT DATA Page 8 of 9 Page 8 of 9

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Calculation Number__l-N1-115__

Instrument Number TS-1291-14C, 14D, 14E, 14F, 14G, 14H, 14J &14K

FORM 2A CALCULATION INPUT SHEET (INCREASING SETPOINT)

*NOTE: VALUES ARE IDENTIFIED FOR MAGNITUDE ONLY AND ARE COMBINED IN ACCORDANCE WITH THE EQUATIONS ON FORM 3 LOWER LIMIT ** NOTE: CALCULATED VALUES FROM FORM 3

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CALCULATION SHEET *4&Boston Edison*

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FORM 3. CALCULATION SHEET SHEET SHEET NO. 3 of 4

Calculation Number 1 -N1-115

Instrument Number._TS-1291-14C, 14D, 14E, 14F, 14G, 14H, 14J & 14K

10. TRIP SETPOINT (TSp) IN PROCESS UNITS

10A. FOR INCREASING SETPOINT - FORM 2A: (ENTER N/A IF DECREASING SETPOINT)

 $TSp = AL - TLU$

TSp **=** 150 **-** 11.95 **=** 138.05, say **138** deg F

1 OB. FOR DECREASING SETPOINT - FROM 2B: (ENTER N/A IF INCREASING SETPOINT)

 $TSp = AL + TLU$

 $TSp = N/A + N/A = N/A$

11. ALLOWABLE VALUE (AV)

11 A. FOR INCREASING SETPOINT - FORM 2A: (ENTER N/A IF DECREASING SETPOINT)

$$
AV = TSp + \sqrt{DA^2 + TA^2}
$$

AV = 147.88, say 148 deg F

 $AV = 138 + \sqrt{(7.05)^2 + (3)^2} + 2.22$

11 B. FOR DECREASING SETPOINT - FORM 2B: (ENTER N/A IF INCREASING SETPOINT)

$$
AV = TSp - \sqrt{DA^2 + TA^2}
$$

AV = N/A - $\sqrt{(N/A)^2 + (N/A)^2}$
AV = N/A

CALCULATION SHEET *^jBoston Edison*

REV 0 DATE 11/17/95 $\frac{17}{100}$ DATE 11/17/95

FORM 3. CALCULATION SHEET SHEET SHEET NO. 4 of 4

Calculation Number 1-N1-115

Instrument Number__TS-1291-14C, 14D, 14E, 14F, 14G, 14H, 14J & 14K

12. OPERATING MARGIN (OM)

12A. FOR INCREASING SETPOINT - FORM 2A: (ENTER N/A IF DECREASING SETPOINT)

OM **=** TSp **-** NUL

OM=138- 105= 33degF

12B. FOR DECREASING SETPOINT - FORM 2B: (ENTER N/A IF INCREASING SETPOINT) OM **=** NLL **-** TSp

OM **=** N/A **-** N/A = N/A

13. RESET VALUE (RV)

13A. FOR INCREASING SETPOINT - FORM 2A: (ENTER N/A IF DECREASING SETPOINT) RV **>** NUL RV **= 133** deg F See note **6** NUL= 105 deg F 13B. FOR DECREASING SETPOINT - FORM 2B: (ENTER N/A IF INCREASING SETPOINT)

> RV < NLL $RV = N/A$

 $NLL = N/A$

14.TRIP SETPOINT (TSp) IN PROCESS UNITS

TSs = TSp MODIFIED BY THE FACTORS ACCOUNTING FOR CONVERSION FROM PROCESS UNIT TO SIGNAL UNITS (VOLTS, AMPS, COUNTS, etc.).

 $TSs = N/A$

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FORM 4. CALCULATION SHEET

CALCULATION NUMBER 1-N1-115

CALCULATION WORK OR REMARKS:

References:

1. Drawings:

- \bullet M-247, Rev. E36 P&ID; RWCU System
- * M-312, Rev. E6 HV∾ Reactor Bldg. Aux. Bay
- "* M-313, Rev. **E5** HV∾ Reactor Bldg. Plan El. 51
- * M-319, Rev. E4 HV∾ Reactor Bldg. Aux. Bay
- M1 N39-13, Rev. E17 Elementary Diagram; Primary Containment Isolation System

2. Pilgrim Unit **I** Specification E-536, Rev. 4; Environmental Parameters for use in the Environmental Qualification of Electrical Equipment (Per 10CFR50.49)

3. PNPS EQ List, Rev. E43

4. PNPS Q-List, Rev. E63

5. PNPS - FSAR, Rev. 16

6. PNPS Technical Specification, Rev. 184

7. Boston Edison Co. Equipment Qualification Data Files; TS-1291-14C, TS-1291-14D, TS-1291 14E, TS-1291-14F, TS-1291-14G, TS-1291-14H, TS-1291-14J & TS-1291-14K; Rev. E2

8. PNPS Procedure No.1.3.36, Rev. 13; Measurement and Test Equipment

9. PNPS Procedure No. 8.M.2-1.2.2, Rev. 22; RWCU Area High Temperature Sensors

10. Office Memorandum No. S&SA 95-47, Dated 9/7/95; HPCI, RCIC and RWCU Steam Leak Detection Setpoint Information

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FORM 4. CALCULATION SHEET

CALCULATION NUMBER **I-N1-115**

11. Patel Engineers Technical Report No. PEI-TR-831200-1, Rev. a; Final Report on the Qualification of a Patel Engineers Modified Fenwal Temperature Switch Manufactured by Fenwal Inc. (EQDF Ref. # 340)

12. Patel **/** EGS Temperature Switch Product Data Sheet,Rev. 11/89 (Attachment 1)

13. ABB Impell Project Instruction No. 25-226-PI-001, Rev. E2; Data Collection and Analysis

14. NEDWI 394, Rev. 3; Methodology for Calculation of Instrument Setpoints

15. U.S. NRC Regulatory Guide 1.105, Rev. 2; Instrument Setpoints for Safety Related Systems

16. Instrument Society of America Standard ISA-67.04-1982; Setpoints for Nuclear Safety Related Instrumentation Used in Nuclear Power Plants

ATTACHMENT 2 TS1291-14C, D, E, F, G, H, J, K DRIFT DATA
CALC. NO. I-N1-115 R.O

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ATTACHMENT 2 TS1291-14C,D,E,F,G,H,J,K DRIFT DATA CALC. NO. **I-NI-115 R,. 0**

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ATTACHMENT 2 TS1291-14C,D,E,F,G,H,J,K DRIFT DATA CALC. NO. *I-Nl-115 P.o*

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ATTACHMENT 2 TS1291-14C,D,E,F,G,HJ,K DRIFT DATA CALC. NO. I-N1-115 R.c

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ATTACHMENT 3 PATEL/EGS TEMP. SWITCH DRIFT DATA CALC. NO. **I-Ni-1.15** Rev. 0

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ATTACHMENT 3 PATEL/EGS TEMP. SWITCH DRIFT DATA CALC. NO. **I-Ni-115.** Rev. 0

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ATTACHMENT 3 PATEL/EGS TEMP. SWITCH DRIFT DATA CALC. NO. **I-N1-115,** Rev. 0

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ATTACHMENT 3 PATEL/EGS TEMP. SWITCH DRIFT DATA CALC. NO. I-NI-115. Rev. 0

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ATTACHMENT 3 PATEL/EGS TEMP. SWITCH DRIFT DATA CALC. **NO.** I-N1-115, Rev. 0

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$5h$ 35 of 47

ATTACHMENT 3 PATEL/EGS TEMP. SWITCH DRIFT DATA CALC. NO. **I-N1-115,** Rev. 0

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ATTACHMENT 3 PATEL/EGS TEMP. SWITCH DRIFT DATA CALC. NO. **I-NI-115,** Rev. 0

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ATTACHMENT 3 5h 37 of 47

PATEL/EGS TEMP. SWITCH DRIFT DATA CALC. NO. **I-NI-115.** Rev. 0

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ATTACHMENT 3 PATEUEGS TEMP. SWITCH DRIFT DATA CALC. NO. **I-NI-115,** Rev. 0

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Pilgrim Calculation No. 1-NI-195

Pages 3 thru 26 and 31 and 32

Rev 1 **Date 2/28/97 3D** *Boston Edison* Sheet 3 of 3⁴

FORM 4. CALCULATION SHEET

CALCULATION NUMBER I-N1 **-195**

CALCULATION WORK OR REMARKS:

Statement of Problem

This calculation will provide the uncertainty analysis for the development of the RCIC steam line low pressure isolation setpoint. It will determine a plant setpoint and allowable value which will ensure initiation on or before reaching the design basis analytical limits. Other parameters determined by this calculation are:

- Instrument Surveillance Interval
- * Measurement and Test Equipment Accuracy
- * Calibration No Adjust Limits
- * Field Reset Value

Method of solution

This calculation is performed based on the methodology described in Beco NEDWI No. 394 and uses ABB Impell Project Instructions No. 25-226-PI-001 for analysis of the as-found and as-left instrument calibration data. The calculation has been prepared in accordance with the U.S. Nuclear Regulatory Commission Regulatory Guide No. 1.105, Rev. 2 and Instrument Society of America Standard ISA-S67.04-1982.

Input Data and Assumptions

In accordance with PNPS FSAR Sections 7.3.4.7 and 7.3.4.8 the RCIC turbine steam line low pressure switches are utilized to isolate the RCIC turbine steam line so that steam and radioactive gases will not escape from the RCIC turbine shaft seals into the Reactor building after steam pressure has decreased to such a low value that the turbine cannot be operated. This trip is not considered a PCIS function. The mission time of these switches is based upon an accident which RCIC is required to function.

Rev 1 Date $2/28/97$ **& Boston Edison** Sheet 4 of 34

FORM 4. **CALCULATION** SHEET

CALCULATION NUMBER I-N1 **-195**

Summary of Results and Recommendations

This calculation determined a new setpoint and Technical Specification allowable value. These values were determined based on plant specific calibration data and NEDWI No. 394 methodology. The sensed instrument setpoint includes margin to account for an instrument line static head of 17.5 psig. The sensed instrument setpoint is equal to the process setpoint plus the instrument line static head.

The results of the calculation are listed below (see note 8):

Trip Setpoint: 70 psig (process pressure) 87.5 psig (instrument sensed pressure)

Technical Specification Allowable Value: 70 **±** 7 psig (process pressure) 87.5 **±** 7 psig (instrument sensed pressure)

Setpoint Analytical limit: >50 psig, but < 100 psig (process pressure) >67.5 psig, but < 117.5 psig (instrument sensed pressure)

Setpoint Reset Value: <79 psig (process pressure) \leq 96.5 psig (instrument sensed pressure)

No Adjust Limits: **±5** psig

Surveillance Interval: Once per 24 months

M&TE Accuracy: **±** 1% of full scale

Rev 1 **Date** $\frac{2}{2}$ **2** *l***₂** $\frac{1}{2}$ *****Boston Edison* Sheet 5 of 3¹

FORM 4. CALCULATION SHEET

CALCULATION NUMBER I-N1 **-195**

This calculation is based on the accuracy specifications of the Static-O-Ring pressure switch model
number 6TA-B3-U8-C1A-JJTTNQ and PNPS specific drift data for the Static -O-Ring pressure switch model number 6TA-B3-NX-C1A-JJTTX6 and 6TA-B3-NX-C1A-JJTTX12. These switches are similar in design. The performance data used in the calculation is considered representative of these model numbers.

Pressure switch PS1360-9B is a Static-O-Ring model no. 6TA-B3-NX-C1A-JJTTX12 and PS1360-9A, C and D are Barksdale model no. P1H-M85SSV. Replacement of switches PS1360-9A, C and D with Static-O-Ring model no. 6TA-B3-U8-ClA-JJTTNQ or 6TA-B3-NX-ClA-JJTTX12 is required for this calculation to be in effect. The Barksdale switches are being replaced because their setpoint cannot be adjusted to the new value determined by this calculation.

 Rev_1 Date $2/28/97$ **2 Boston Edison** Sheet 6 of 3⁴

FORM 4. CALCULATION SHEET

CALCULATION NUMBER I-N1-195

Calculation Work Or Remarks:

Notes:

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1. RCIC turbine steam line low pressure is used to automatically close the two isolation valves in the RCIC turbine steam line, so that steam and radioactive gases will not escape from the RCIC turbine shaft seals into the reactor building after steam pressure has decreased to such a low value that the turbine cannot be operated. See FSAR Section 7.3.4.7.9. In accordance with FSAR Table 4.7-1 the RCIC Turbine Steam Inlet pressure range is 150 to 1,120 psia. Therefore, to ensure that RCIC is available for the above pressure range the Turbine should not be trip off or re started greater than 135 psig. The isolation setpoint and reset are chosen at a pressure below that at which the RCIC turbine can operate effectively. This isolation is expected to be operational anytime RCIC is operated including after an accident.

2. The calculation is based on the Static-O-Ring switch model numbers 6TA-B3-U8-C1A-JJTTNQ and 6TA-B3-NX-C1A-JJTTX12. The switches are similar in design and the accuracy data used in this calculation is considered representative of these switches. See SOR Forms # 216 and 651. Presently, switches PS1360-9A,C and D are Barksdale model no. P1H-M85SSV and switch PS1360-9B is a Static-O-Ring model no. 6TA-B3-NX-C1A-JJTTX12. A design change is to be performed which will replace the Barksdale switches with static-o-ring model no. 6TA-B3-U8-C1A-JJTTNQ. Therefore, the results of this calculation are not in effect until the design change has been completed.

3. The Static-O-Ring pressure switch will not experience a pressure effect due to a pipe break outside containment. The maximum ambient pressure due to a steam line break is 15.22 psia. Reference Pilgrim Unit **1** Specification E-536, Figure C.4.1-7 for the pressure profile. This transient will not cause the pressure switch to experience an error because the switch housing is sealed and the sensing element is referenced to the pressure inside the switch housing. Reference Attachment **1.** See note 4 for internal housing pressure changes due to ambient temperature variations.

Rev 1 Date 2/28/97 *Boston Edison* Sheet 1 of 34

4. The temperature effect of the Static-O-Ring pressure switch is identified in Attachment 1. The switch setpoint changes as a result of a sealed housing effect and natural temperature influence. This relationship is applicable to the Static-O-Ring pressure switch model numbers 6TA-B3-U8 **CIA-JJJTTNQ** and 6TA-B3-NX-C1A-JJTTX12. The change in setpoint due to a temperature increase from a normal operating temperature of 60 deg. F to the peak accident temperature of 242 deg. F (reference FSAR Table 10.9-1 and Specification E-536, Fig.C.4.1-7) is:

Change in Setpoint = (.04psi/deg F - .0003 x SP psi/deg **F)A** deg F

(.04psig/deg. F)(242-60)deg. F - (.0003/deg. F)(87.5)psig(242-60)deg. F= **2.5** psig

Because the change in setpoint is positive, the error will make the switch trip sooner on a decreasing signal and therefore will be subtracted from the upper Analytical Limit when determining the setpoint.

5. The radiation effect or error is defined as the change in setpoint due to radiation testing. The radiation effect of the Static-O-Ring pressure switch is determined in attachment 2. Six switches were tested. Though the models 6TA-B3-U8-CIA-JJTTNQ and 6TA-B3-NX-CIA-JJTTX12 switches were not included in the switches tested, the test results are representative of these models and can be used in this analysis. The greatest change (error) for a decreasing setpoint in these tests is 2.8% of span. Assuming this error is random and independent of the other errors in this analysis, a value of *(+1-* .028 * 88 psig = *+1-* 2.5 psig) is to be used for the radiation effect of the Static-O-Ring switch.

6. The seismic effect or error is defined as the change in setpoint due to seismic testing. The seismic effect of the static-o-ring pressure switch is determined from attachment 2. Six switches were tested. Though the model 6TA-B3-U8-C1A-JJTTNQ and 6TA-B3-U8-CIA-JJTTX12 switches were not included in the test, the results are representative of these models and can be used in this analysis. The greatest change for a decreasing setpoint in these tests is 4% of span. Assuming the error is random and independent of the errors in this analysis, a value of (+/- .04 * 88 psig = $+$ /- 3.5 psig) is to be used for the seismic effect.

Rev 1 Date $\frac{2}{29}$

<u>&</u> Boston Edison Sheet *R*_ of 3⁴

7. The circuit leakage allowance is applicable to low energy analog signals only. The RCIC low pressure switches are mechanical on/off switches. Therefore, this error is not applicable.

8. The RCIC steam line low pressure switches connect to the process at approximately 44'- 6" elevation in the drywell. Reference drawings M1 001 sh 55 and 56 and MIOOBC21-3. the pressure switches are located in the reactor building and are shown on drawings M15 and M1P355-5. The instrument line drywell penetrations are shown on drawings M1002 sh. 68 and 69. These drawings delineate the instrument line routing and are used to determine equipment elevations in the below static head calculation.

The instrument lines are maintained filled with condensate which creates a static head that is sensed by PS1360-9A ,B ,C & D. Due to dimensional differences, these four installations have different instrument line static heads. This analysis will use the installation which has the greatest head to determine "Sensed Instrument Setpoint". The sensed instrument setpoint is equal to the process setpoint plus instrument line greatest static head.

The instrument line head is a function of reactor pressure, and drywell and reactor building temperature. The operating conditions which causes the greatest static head will be assumed. The conditions are reactor pressure equal to 50 psig, drywell ambient temperature equal to 120 deg. F and reactor bldg. ambient temperature equal to 60 deg. F (reference Pilgrim Unit **1** Specification E-536, Figure C.4.1-18 and FSAR Table 10.9-1).

Instrument Line Greatest Static Head

Rev 1 Date 2/28/97

Ex Boston Edison Sheet 9 of 3⁴

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CALCULATION NUMBER **L-N1-195**

Collaboration

 Rev_1 Date $\frac{2|28|q7}{\sqrt{3}}$ **Boston Edison** Sheet **1.** of $\frac{34}{2}$

FORM 4. CALCULATION SHEET

CALCULATION NUMBER [-N1-195

Instrument Line Static Head Error

Error = Maximum Static Head - Minimum Static Head $= 17.5$ psig - 4.55 psig **=** 13 psig

This error will make the switch trip sooner on a decreasing signal and therefore will be subtracted from the upper Analytical Limit when determining the setpoint.

9. The sensor drift was statistically analyzed in Attachment no. 3 in accordance with ABB Impell Project Instruction 25-226-PI-001. The analysis used empirical data from 6/20/88 through 6/27/96 obtained from the PNPS as-found as-left instrument calibration records (reference PNPS Procedure 8.M.2- 2.6.4). The calibration frequency of the switches for the above data is once per 3 months. The drift interval for the above analysis is 30 months. This interval is determined by combining consecutive surveillance's that do not require interim calibration. The value obtained from the statistical analysis has a probability and confidence of 95/95 **%.**

The sensor drift determined is considered to include the effects of measurement and test equipment (M&TE) and sensor basic accuracy. Therefore, values will not be entered in this calculation for SCA (calibration accuracy) or SA (sensor accuracy). It is assumed the accuracy of the M&TE used for calibration is less than or equal to the instrument being calibrated (reference PNPS Procedure 1.3.36).

10. The errors identified in this calculation are to be used to determine the setpoint and allowable value. See Form 3, sheets 2 and 3. Because of the instrument line static head, the process setpoint and allowable value are different than the "sensed" instrument setpoint and notify watch engineer value. The relationship between these values are:

Instrument Setpoint = Process Setpoint + Maximum Instrument Line Static Head

Notify Watch Engineer Value = Allowable Value + Maximum Instrument Line Static Head

Rev 1 Date 2/28/97

4 Boston Edison Sheet **II** of $3\frac{1}{2}$

FORM 4. **CALCULATION SHEET**

CALCULATION NUMBER ________ I-N1-195

The process setpoint and allowable value are:

Process Setpoint = 70 psig Allowable Value = 70 ± 7 psig

The instrument setpoint and notify watch engineer value are:

Instrument Setpoint = 87.5 Notify Watch Engineer Value = 87.5 **±** 7 psig

REV₁ DATE $2/28/97$ SHEET 12 OF 34

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FORM 1 INSTRUMENT DATA Page 1 of 9

Calculation Number I-N1-195 Instrument NumberPS1360-9A,B,C&D_

REV₁ DATE $\frac{2/28/97}{ }$

Calculation Number IN1 -1 95 Instrument Number PS1360-9A,B,C&D_

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FORM **I INSTRUMENT DATA** Page 2 of **⁹**

REV___1____ DATE___*2|2*.8*|*97______

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FORM 1 INSTRUMENT DATA Page 3 of 9 TITLE DESCRIPTION/VALUE REFERENCE REMARKS 12 TO 100 psig | SOR Inc. Form 216 and 651 ADJUSTABLE RANGE RCIC Steamline Dwg. M245 INPUT SIGNAL FROM \mathbf{r}

N/A Instrument Is a pressure
switch INPUT SIGNAL $\begin{array}{ccc} \end{array}$ CALIBRATED RANGE RCIC automatic DWG. M1G12-12 INSTRUMENT | OUTPUT SIGNAL TO | isolation SETPOINT DATA (CONT) N/A Instrument is a pressure
switch **OUTPUT SIGNAL** CALIBRATED RANGE

Once per 3 months PNPS Tech. Spec.

This calculation is performed

This calculation is performed

Dased on a 24 month

SETPOINT Plus 25% Table 4.2.b and based on a 24 month
ALIBRATION CALIBRATION CALIBRATION FREQUENCY PREQUENCY PREQUENCY

SHEET **14-** OF **3+**

Calculation Number I-N1-195 2002 2003 11: Exercise 1: Alternative Instrument Number_PS1360-9A,B,C&D_

 $REV = 1$ DATE $\frac{2/28/97}{97}$ $SHEET \frac{15}{9}$ OF $\frac{34}{9}$

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Calculation Number I-N1-195. Instrument Number_PS1360-9A,B,C&D_

FORM 3 STEP 2 | LEAKAGE (TI)

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LEAKAGE (PI)

FORM 1 INSTRUMENT DATA Page 4 of 9

TITLE DESCRIPTION/VALUE REFERENCE REMARKS -2.5 psig and altachment 1 **TEMPERATURE** EFFECT (Te) ± 2.5 **psig COV Attachment 2** See Note 5 ENVIRONMENT | RADIATION EFFECT ALLOWANCE (EA) (Re) FORM 3 STEP **1** N/A Equipment Is STEAM/CHEMICAL | www.industrial.com/industrial/state-of-controllering-of-controllering-of-controllering-of-controllering-of-controllering-of-controllering-of-controllering-of-controllering-of-controllering-of-controllering SPRAY EFFECT (S/Ce) | SPRAY EFFECT (S/Ce) | located in secondary cont.

PRESSURIZATION N/A Attachment 1 See Note 3 PRESSURIZATION **I** N/A (EXTERNAL) EFFECT (Pe) ± 3.5 psig **Attachment 2** See Note 6 **SEISMIC** EFFECT (Se) N/A See Note 7 CABLE LEAKAGE **(CI)** CIRCUIT LEAKAGE See Note 7 ALLOWANCE (LA) | TERMINAL BLOCK

PENETRATION | N/A | See Note 7

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REV 1 DATE **h7**

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Calculation Number_l-N1-195_

FORM **1 INSTRUMENT DATA**

SHEET **'ý6 OF-3"**

Instrument Number_PS1360-9A,B,C&D_

Page 5 of 9

REV₁ DATE 2/28/97

FORM 1 INSTRUMENT DATA Page 6 of 9

SHEET/'7 **OF 3+**

Calculation Number l-N1-195 Instrument NumberPS1360-9A,B,C&D_

REV_{il} DATE $2/28/97$

FORM 1 INSTRUMENT DATA Page 7 of 9 Page 7 of 9

SHEET 18 OF 34

Calculation Number **I-N1 -195** Instrument Number_PS1360-9A,B,C&D_

REV₁ DATE $2/28/97$

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Calculation Number 1-N1-195 1.1 Calculation Number 201360-9A,B,C&D

FORM 1 INSTRUMENT DATA Page 8 of 9

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SHEET 19 OF 34

 REV_1 DATE $2/28/97$

SHEET 20 OF $3\frac{11}{2}$

Calculation Number___ I-N1-195__

Instrument Number_PS1360-9A, B, C & D__

FORM 2B CALCULATION INPUT SHEET (DECREASING SETPOINT)

*NOTE: VALUES ARE IDENTIFIED FOR MAGNITUDE ONLY AND ARE COMBINED IN ACCORDANCE WITH THE EQUATIONS ON FORM 3

$$
DA = \sqrt{(3d)^{2} + (Red)^{2}}
$$
\n
$$
DA = \sqrt{(4.7)^{2} + (N/A)^{2}}
$$
\n
$$
= \pm 4.7
$$
\n8. IOLERANCE ALLOWANCE (TA)\n
$$
TA = \sqrt{(5)^{2} + (N/A)^{2}}
$$
\n
$$
= \pm 5
$$
\n9. IOIALLOOP UNCERIANIY ALLOWANCE (TLU)\n
$$
TLU = LA \pm \sqrt{(EA)^{2} + (PA)^{2} + (CA)^{2} + (RA)^{2} + (SA)^{2} + (DA)^{2} + (IA)^{2}}
$$

$$
TLU = N/A_{+} \pm \sqrt{(4.3)^{2} + (N/A)^{2} + (N/A)^{2} + (N/A)^{2} + (N/A)^{2} + (A.7)^{2} + (5)^{2} - 2.5 - 13}
$$
\n
$$
TLU = 4.8.1 - 23.6
$$

REV 1 DATE 2/28/97

11. ALLOWABLE VALUE (AV)

SHEET Z• OF **'3q-**

FORM 3. CALCULATION SHEET SHEET SHEET NO. 3 of 4

Calculation Number I-N1-195 Instrument Number PS-1360-9A, B, C & D 10. TRIP SETPOINT (TSp) IN PROCESS UNITS **1** 0A. FOR INCREASING SETPOINT - FORM 2A: (ENTER N/A IF DECREASING SETPOINT) $TSp = AL - TLU$ $TSp = N/A$ _ - _N/A_ = __N/A__ 10B. FOR DECREASING SETPOINT - FROM 2B: (ENTER N/A IF INCREASING SETPOINT)
UPPER AL LOWER AL UPPER AL UPPER AL UPPER AL TSD = AL - TLU $TSp = AL + TLU$ $TSp = 50 + .8.1 = .58.1$ CHOSE A SETPOINT = 70 PSIG (PROCESS PRESSURE) SEE NOTE 10

1 IA. FOR INCREASING SETPOINT- FORM 2A: (ENTER N/A IF DECREASING SETPOINT)

$$
AV = TSp + \sqrt{DA^2 + TA^2}
$$

$$
AV = N/A_{+} + V_{N/A_{+}}^2 + (N/A_{-})^2
$$

AV = N/A_{-}

11 B. FOR DECREASING SETPOINT - FORM 2B: (ENTER N/A IF INCREASING SETPOINT)

$$
AV = TSp - \sqrt{DA^2 + TA^2}
$$

$$
AV = 70 - \sqrt{(-4.7)^2 + (-5)^2}
$$

$$
AV = 70 \pm 6.9_P SIG
$$
: $SAY 70 \pm 7 PSIG (PROCESS PRESSURE)$

CALCULATION SHEET *REV_1_ DATE* $2/28/97$ **Boston Edison**

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SHEET NO. 4 of 4

Calculation Number **I-NI -195**

 $Instrument$ Number $_PS-1360-9A$, B, C & D P

12. OPERATING MARGIN (OM)

12A. FOR INCREASING SETPOINT - FORM 2A: (ENTER N/A IF DECREASING SETPOINT)

OM **=** TSp **-** NUL

OMM = _N/A_ *-* _N/A_ **=** _N/A_

12B. FOR DECREASING SETPOINT - FORM 2B: (ENTER N/A IF INCREASING SETPOINT) OM **=** NLL-TSp

OM = _940_ - _70_ = _870 PSIG__ (PROCESS PRESSURE) SEE NOTE 10

13. RESET VALUE (RV)

13A. FOR INCREASING SETPOINT - FORM 2A: (ENTER N/A IF DECREASING SETPOINT) RV > NUL $RV =$ N/A $NUL = N/A$

13B. FOR DECREASING SEIPOINT - FORM 2B: (ENTER N/A IF INCREASING SETPOINT) RV < NLL
RV = _<79 PSIG_ (PROCESS PRESSURE) NLL = __940 PSIG__ FROM DATA SHEET M221ADS7 RESET DIFFERENTIAL GREATEST VALUE EQUAL TO 9 PSI i.e. RV = SP **+** RESET DIFF.

14. TRIP SETPOINT (TSp) IN PROCESS UNITS

TSs = TSp MODIFIED BY THE FACTORS ACCOUNTING FOR CONVERSION FROM PROCESS UNIT TO SIGNAL UNITS (VOLTS, AMPS, COUNTS, etc.).

TSs **=** _ N/A **.** (NOTE: DOCUMENT CONVERSION ON FORM 4)

Rev 1 Date $\frac{2/28}{97}$ *Soston Edison* Sheet 25 of 3

FORM 4. **CALCULATION SHEET**

CALCULATION NUMBER I-N1-195

CALCULATION WORK OR REMARKS:

References

- 1. Drawings
	- M245, Rev. 25 P&ID RCIC System
	- \bullet M1G2-5, Rev. E9 Function Control Diagram RCIC System
	- \bullet M1G12-12, Rev. E14 Elementary Digram RCIC System
	- M1P355-5, Rev.E3 Arrangement Drawing Leak Detection Instrument Rack 2257
	- \bullet M1001 Sh. 55, Rev. 5 RCIC System Diff. Press. 1360-1
	- M1001 Sh. 56, Rev. 4 RCIC System Diff. Press. 1360-1
	- M1002 Sh. 68, Rev. 7 RCIC Instrument Piping to DPIS 1360-1
	- \bullet M1002 Sh. 69, Rev. 7 RCIC Instrument Piping to DPIS 1360-1
	- $*$ M100BC21-3, Rev. E3 RCIC Syst. Steam Supply Line to Turbine X-202
	- \bullet M15, Rev. E17 Equipment Location Reactor Building
- 2. NEDWI 394, Rev. 3; Methodology for Calculation of Instrument Setpoints
- 3. U.S. NRC Regulatory Guide 1.105, Rev. 2; Instrument Setpoints for Safety Related Systems
- 4. Instrument Society of America Standard ISA-67.04-1982; Setpoints for Nuclear Safety Related Instrumentation Used in Nuclear Power Plants
- 5. PNPS **-** FSAR, Rev. 19
- 6. PNPS Technical Specification, Rev. 187
- 7. PNPS Q-List, Rev. E64
- 8. PNPS Equipment Qualification Master List, Rev. E45
- 9. PNPS Procedure No. 1.3.36, Rev. 13; Measurement and Test Equipment

Rev 1 **Date 2/28/97** *Boston Edison* Sheet 26 of 34

FORM 4. CALCULATION SHEET

CALCULATION NUMBER **I-N1-195**

- 10. PNPS Procedure No. 2.1.1, Rev. 83; Startup from Shutdown
- 11. PNPS Procedure No. 8.M.2-2.6.4, Rev. 21; RCIC Steamline Low Pressure
- 12. ABB Impell Project Instruction No. 25-226-PI-001, Rev. E2; Data Collection and Analysis
- 13. SOR Inc. Form No. 216 Rev. 3/90; Pressure Switch by SOR Inc. for Process Applications
- 14. SOR Inc. Form No. 651 Rev. 7/93; SOR **1E** Qualified Pressure, Vacuum & Temperature Switches for the Nuclear Power Industry
- 15. Pilgrim Unit 1 Specification E-536, Rev. E5; Environmental Parameters for Use in the Environmental Qualification of Electrical Equipment
- 16. Data Sheet M221ADS7, Rev. **1**
- 17. Boston Edison Co. Equipment Qualification Data Files; PS1360-9B; Rev. E3
- 18. SOR Inc. Test Report No. 9058-102, Copyright 1993; Nuclear Qualification Test Report for SOR Pressure, Vacuum, and Temperature Switches (EQDF Ref. 419)

$Sheet 31$ at 24

ATTACHMENT 3 PS-1360-98 DRIFT DATA CALC. NO. I-NI-195 1 Re.

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Sheet 32 of 34

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ATTACHMENT 3 PS-1360-9B DRIFT DATA CALC. NO. I-Nl-195 Rev, **IRev,**

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ATTACHMENT 5

SUMMARY OF REGULATORY COMMITMENTS

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Summary of Regulatory Commitments

The following table identified those actions committed to by Pilgrim in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

