

August 28, 2003

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

ATTENTION: Document Control Desk

Subject: Duke Energy Corporation

Catawba Nuclear Station, Units 1 and 2
Docket Numbers 50-413 and 50-414

License Amendment Request Supplement for
Catawba Technical Specification 3.3.2, Engineered
Safety Feature Actuation System Instrumentation

In the letters identified below,^{1,2,3} Duke Energy Corporation (Duke) submitted a license amendment request for Catawba Nuclear Station Technical Specification (TS) 3.3.2, Engineered Safety Feature Actuation System Instrumentation. Among the changes proposed in this LAR was deletion of the current TS requirements for the Dog House Water Level - High High Function. Duke has decided to withdraw this proposed deletion. Consequently, the reprinted TS pages that were included in the original LAR submittal package have been revised. These revised pages are included as an attachment to this letter. Necessary changes are also being made to the Bases at this time and these are included for information. Since this withdrawal will result in maintaining the current TS requirements for the Doghouse Function, and neither does the withdrawal effect any of the

¹ M. S. Tuckman, Duke Energy Corporation, Letter to the NRC Document Control Desk Dated December 20, 2001, SUBJECT: License Amendment Request for Catawba Nuclear Station Technical Specifications 3.3.2, Engineered Safety Feature Actuation System Instrumentation; and 3.3.5, Loss of Power Diesel Generator Start Instrumentation.

² M. S. Tuckman, Duke Energy Corporation, Letter to the NRC Document Control Desk Dated March 4, 2002, SUBJECT: Catawba Nuclear Station, Withdrawal of a Portion of a License Amendment Request Applicable to Technical 3.3.2 and Technical Specification Table 3.3.2-1.

³ G. R. Peterson, Duke Energy Corporation, Letter to the NRC Document Control Desk Dated November 20, 2002, SUBJECT: License Amendment Request Applicable to Catawba Nuclear Station Technical Specifications 3.3.2, Engineered Safety Feature Actuation System Instrumentation; and 3.3.5, Loss of Power Diesel Generator Start Instrumentation.

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other changes proposed to TS 3.3.2, Duke has determined that the No Significant Hazards Consideration Determination originally performed for this LAR remains valid. Likewise, the original basis for excluding this LAR from the requirements to perform an environmental assessment/impact statement remains valid.

The contents of this submittal package are:

- An affidavit is included within this cover letter.
- Attachment 1 provides reprinted TS and Bases pages for Catawba.

Inquiries on this matter should be directed to J. S. Warren at (704) 382-4986.

Very truly yours,



H. B. Barron
Senior Vice President, Nuclear Operations

Attachments

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xc w/Attachments:

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H. B. Barron, affirms that he is the person who subscribed his name to the foregoing statement, and that all the matters and facts set forth herein are true and correct to the best of his knowledge.

H. B. Barron

H. B. Barron, Senior Vice President

Subscribed and sworn to me:

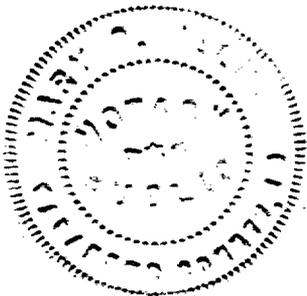
Aug 27, 2003
Date

Mary P. Debus

Notary Public

My commission expires:

JAN 22, 2006
Date



SEAL

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bxw w/Attachments:

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K. E. Nicholson
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P. O. Box 929
Laurens, SC 29360-0929

NC Municipal Power Agency No. 1
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T. R. Puryear
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Piedmont Municipal Power Agency
121 Village Drive
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Attachment 1

Catawba Units 1 and 2

Technical Specifications and Bases

Reprinted Pages

<u>Remove</u>	<u>Insert</u>
3.3.2-10	3.3.2-10
3.3.2-13	3.3.2-13
3.3.2-14	3.3.2-14
3.3.2-15	3.3.2-15
B3.3.2-19 thru	B3.3.2-19 thru
B3.3.2-30	B3.3.2-30
B3.3.2-33	B3.3.2-33
B3.3.2-36 thru	B3.3.2-36 thru
B3.3.2-48	B3.3.2-49

SURVEILLANCE	FREQUENCY
<p>SR 3.3.2.8 -----NOTE----- Verification of setpoint not required for manual initiation functions. ----- Perform TADOT.</p>	18 months
<p>SR 3.3.2.9 -----NOTE----- This Surveillance shall include verification that the time constants are adjusted to the prescribed values. ----- Perform CHANNEL CALIBRATION.</p>	18 months
<p>SR 3.3.2.10 -----NOTE----- Not required to be performed for the turbine driven AFW pump until 24 hours after SG pressure is \geq 600 psig. ----- Verify ESFAS RESPONSE TIMES are within limit.</p>	18 months on a STAGGERED TEST BASIS
<p>SR 3.3.2.11 Perform COT.</p>	18 months
<p>SR 3.3.2.12 Perform ACTUATION LOGIC TEST.</p>	18 months

Table 3.3.2-1 (page 3 of 5)
Engineered Safety Feature Actuation System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	NOMINAL TRIP SETPOINT
4. Steam Line Isolation (continued)						
(2) Negative Rate - High	3(b)(c)	3 per steam line	D	SR 3.3.2.1 SR 3.3.2.5 SR 3.3.2.9 SR 3.3.2.10	≤ 122.8 ^(d) psi	100 ^(d) psi
5. Turbine Trip and Feedwater Isolation						
a. Turbine Trip						
(1) Automatic Actuation Logic and Actuation Relays	1,2	2 trains	I	SR 3.3.2.2 SR 3.3.2.4 SR 3.3.2.6	NA	NA
(2) SG Water Level-High-High (P-14)	1,2	4 per SG	J	SR 3.3.2.1 SR 3.3.2.2 SR 3.3.2.4 SR 3.3.2.5 SR 3.3.2.6 SR 3.3.2.9 SR 3.3.2.10	≤ 85.6% (Unit 1) ≤ 78.9% (Unit 2)	83.9% (Unit 1) 77.1% (Unit 2)
(3) Safety Injection	Refer to Function 1 (Safety Injection) for all initiation functions and requirements. See Item 5.a.(1) for Applicable MODES.					
b. Feedwater Isolation						
(1) Automatic Actuation Logic and Actuation Relays	1,2(e),3(e)	2 trains	H	SR 3.3.2.2 SR 3.3.2.4 SR 3.3.2.6	NA	NA

(continued)

(b) Except when all MSIVs are closed and de-activated.

(c) Trip function automatically blocked above P-11 (Pressurizer Pressure) interlock and may be blocked below P-11 when Steam Line Isolation Steam Line Pressure - Low is not blocked.

(d) Time constant utilized in the rate/lag controller is ≥ 50 seconds.

(e) Except when all MFIVs, MFCVs, and associated bypass valves are closed and de-activated or isolated by a closed manual valve.

Table 3.3.2-1 (page 4 of 5)
Engineered Safety Feature Actuation System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	NOMINAL TRIP SETPOINT
(2) SG Water Level- High High (P-14)	1,2(e),3(e)	4 per SG	D	SR 3.3.2.1 SR 3.3.2.2 SR 3.3.2.4 SR 3.3.2.5 SR 3.3.2.6 SR 3.3.2.9 SR 3.3.2.10	≤ 85.6% (Unit 1) ≤ 78.9% (Unit 2)	83.9% (Unit 1) 77.1% (Unit 2)
(3) Safety Injection	Refer to Function 1 (Safety Injection) for all initiation functions and requirements. See Item 5.b.(1) for Applicable MODES.					
(4) Tavg-Low	1,2(e)	4	J	SR 3.3.2.1 SR 3.3.2.5 SR 3.3.2.9	≥ 561°F	564°F
coincident with Reactor Trip, P-4	Refer to Function 8.a (Reactor Trip, P-4) for all initiation functions and requirements.					
(5) Doghouse WaterLevel - High High	1,2(e)	2 per doghouse	L	SR 3.3.2.8	≤ 12 inches above 577 ft floor level	11 inches above 577 ft floor level
6. Auxiliary Feedwater						
a. Automatic Actuation Logic and Actuation Relays	1,2,3	2 trains	H	SR 3.3.2.2 SR 3.3.2.4 SR 3.3.2.6	NA	NA
b. SG Water Level - Low Low	1,2,3	4 per SG	D	SR 3.3.2.1 SR 3.3.2.5 SR 3.3.2.9 SR 3.3.2.10	≥ 9% (Unit 1) ≥ 35.1% (Unit 2)	10.7% (Unit 1) 36.8% (Unit 2)
c. Safety Injection	Refer to Function 1 (Safety Injection) for all initiation functions and requirements.					
d. Loss of Offsite Power	1,2,3	3 per bus	D	SR 3.3.2.3 SR 3.3.2.9 SR 3.3.2.10	≥ 3242 V	3500 V
e. Trip of all Main Feedwater Pumps	1,2	3 per pump	K	SR 3.3.2.8 SR 3.3.2.10	NA	NA
f. Auxiliary Feedwater Pump Train A and Train B Suction Transfer on Suction Pressure - Low	1,2,3	3 per train	M	SR 3.3.2.8 SR 3.3.2.10	A) ≥ 9.5 psig B) ≥ 5.2 psig (Unit 1) ≥ 5.0 psig (Unit 2)	A) 10.5 psig B) 6.2 psig (Unit 1) 6.0 psig (Unit 2)

(continued)

(e) Except when all MFIVs, MFCVs, and associated bypass valves are closed and de-activated or isolated by a closed manual valve.

Table 3.3.2-1 (page 5 of 5)
Engineered Safety Feature Actuation System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	NOMINAL TRIP SETPOINT
7. Automatic Switchover to Containment Sump						
a. Automatic Actuation Logic and Actuation Relays	1,2,3,4	2 trains	C	SR 3.3.2.2 SR 3.3.2.4 SR 3.3.2.6	NA	NA
b. Refueling Water Storage Tank (RWST) Level - Low	1,2,3,4	4	N	SR 3.3.2.1 SR 3.3.2.7 SR 3.3.2.9 SR 3.3.2.10	≥ 162.4 inches	177.15 inches
Coincident with Safety Injection	Refer to Function 1 (Safety Injection) for all initiation functions and requirements.					
8. ESFAS Interlocks						
a. Reactor Trip, P-4	1,2,3	1 per train, 2 trains	F	SR 3.3.2.8	NA	NA
b. Pressurizer Pressure, P-11	1,2,3	3	O	SR 3.3.2.5 SR 3.3.2.9	≥ 1944 and ≤ 1966 psig	1955 psig
c. T _{avg} - Low Low, P-12	1,2,3	1 per loop	O	SR 3.3.2.5 SR 3.3.2.9	≥ 550°F	553°F
9. Containment Pressure Control System						
a. Start Permissive	1,2,3,4	4 per train	P	SR 3.3.2.1 SR 3.3.2.7 SR 3.3.2.9	≤ 0.45 psid	0.4 psid
b. Termination	1,2,3,4	4 per train	P	SR 3.3.2.1 SR 3.3.2.7 SR 3.3.2.9	≥ 0.25 psid	0.3 psid
10. Nuclear Service Water Suction Transfer - Low Pit Level						
	1,2,3,4	3 per pit	Q,R	SR 3.3.2.1 SR 3.3.2.9 SR 3.3.2.11 SR 3.3.2.12	≥ El. 555.4 ft	El. 557.5 ft

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

(2) Steam Line Pressure-Negative Rate-High

Steam Line Pressure-Negative Rate-High provides closure of the MSIVs for an SLB when less than the P-11 setpoint, to maintain at least one unfaulted SG as a heat sink for the reactor, and to limit the mass and energy release to containment. When the operator manually blocks the Steam Line Pressure-Low main steam isolation signal when less than the P-11 setpoint, the Steam Line Pressure-Negative Rate-High signal is automatically enabled. Steam Line Pressure-Negative Rate-High provides no input to any control functions. Thus, three OPERABLE channels are sufficient to satisfy requirements with a two-out-of-three logic on each steam line.

Steam Line Pressure-Negative Rate-High must be OPERABLE in MODE 3 when less than the P-11 setpoint, when a secondary side break or stuck open valve could result in the rapid depressurization of the steam line(s). In MODES 1 and 2, and in MODE 3, when above the P-11 setpoint, this signal is automatically disabled and the Steam Line Pressure-Low signal is automatically enabled. The Steam Line Isolation Function is required to be OPERABLE in MODES 2 and 3 unless all MSIVs are closed and deactivated. In MODES 4, 5, and 6, there is insufficient energy in the primary and secondary sides to have an SLB or other accident that would result in a release of significant enough quantities of energy to cause a cooldown of the RCS.

5. Turbine Trip and Feedwater Isolation

The primary functions of the Turbine Trip and Feedwater Isolation signals are to prevent damage to the turbine due to water in the steam lines, stop the excessive flow of feedwater into the SGs, and to limit the energy released into containment. These Functions are necessary to mitigate the effects of a high water level in the SGs, which could result in carryover of water into the steam lines and excessive cooldown of the primary system. The SG high water level is due to excessive feedwater flows. Feedwater Isolation serves to limit the energy released into containment upon a feedwater line or steam line break inside containment.

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

The Functions are actuated when the level in any SG exceeds the high high setpoint, and performs the following functions:

- Trips the main turbine;
- Trips the MFW pumps;
- Initiates feedwater isolation; and
- Shuts the MFW regulating valves and the bypass feedwater regulating valves.

Turbine Trip and Feedwater Isolation signals are both actuated by SG Water Level-High High, or by an SI signal. The RTS also initiates a turbine trip signal whenever a reactor trip (P-4) is generated. A Feedwater Isolation signal is also generated by a reactor trip (P-4) coincident with T_{avg} -Low and on a high water level in the reactor building doghouse. The MFW System is also taken out of operation and the AFW System is automatically started. The SI signal was discussed previously.

a. Turbine Trip

(1) Turbine Trip-Automatic Actuation Logic and Actuation Relays

Automatic Actuation Logic and Actuation Relays consist of the same features and operate in the same manner as described for ESFAS Function 1.b.

(2) Turbine Trip-Steam Generator Water Level-High High (P-14)

This signal prevents damage to the turbine due to water in the steam lines. The ESFAS SG water level instruments provide input to the SG Water Level Control System. Therefore, the actuation logic must be able to withstand both an input failure to the control system (which may then require the protection function actuation) and a single failure in the other channels providing the protection function actuation. Thus, four OPERABLE channels are required to satisfy the requirements with a two-out-of-four logic. The setpoints are based on percent of narrow range

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

instrument span.

(3) Turbine Trip-Safety Injection

Turbine Trip is also initiated by all Functions that initiate SI. Therefore, the requirements are not repeated in Table 3.3.2-1. Instead Function 1, SI, is referenced for all initiating functions and requirements. Item 5.a.(1) is referenced for the applicable MODES.

The Turbine Trip Function must be OPERABLE in MODES 1 and 2. In lower MODES, the turbine generator is not in service and this Function is not required to be OPERABLE.

b. Feedwater Isolation

(1) Feedwater Isolation-Automatic Actuation Logic and Actuation Relays

Automatic Actuation Logic and Actuation Relays consist of the same features and operate in the same manner as described for ESFAS Function 1.b.

(2) Feedwater Isolation-Steam Generator Water Level-High High (P-14)

This signal provides protection against excessive feedwater flow. The ESFAS SG water level instruments provide input to the SG Water Level Control System. Therefore, the actuation logic must be able to withstand both an input failure to the control system (which may then require the protection function actuation) and a single failure in the other channels providing the protection function actuation. Thus, four OPERABLE channels are required to satisfy the requirements with a two-out-of-four logic. The setpoints are based on percent of narrow range instrument span.

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

(3) Feedwater Isolation-Safety Injection

Feedwater Isolation is also initiated by all Functions that initiate SI. The Feedwater Isolation Function requirements for these Functions are the same as the requirements for their SI function. Therefore, the requirements are not repeated in Table 3.3.2-1. Instead Function 1, SI, is referenced for all initiating functions and requirements. Item 5.b.(1) is referenced for the applicable MODES.

(4) Feedwater Isolation - RCS T_{avg} - Low coincident with Reactor Trip (P-4)

This signal provides protection against excessive cooldown, which could subsequently introduce a positive reactivity excursion after a plant trip. There are four channels of RCS T_{avg} - Low (one per loop), with a two-out-of-four logic required coincident with a reactor trip signal (P-4) to initiate a feedwater isolation. The P-4 interlock is discussed in Function 8.a.

(5) Turbine Trip and Feedwater Isolation – Doghouse Water Level – High High

This signal initiates a Feedwater Isolation. The signal terminates forward feedwater flow in the event of a postulated pipe break in the main feedwater piping in the doghouses to prevent flooding safety related equipment essential to the safe shutdown of the plant. The level instrumentation consists of two level switches (one per train) in each of the two reactor building doghouses. A high-high level detected by one-out-two switches, in either the inboard or outboard doghouse, will initiate a doghouse isolation. This signal initiates Feedwater Isolation for the specific doghouse where the High-High level is detected and trips both main feedwater pumps thus causing a main turbine trip.

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

The Feedwater Isolation Function must be OPERABLE in MODES 1 and 2 and also in MODE 3 (except for the functions listed in Table 3.3.2-1). Feedwater Isolation is not required OPERABLE when all MFIVs, MFCVs, and associated bypass valves are closed and de-activated or isolated by a closed manual valve. In lower MODES, the MFW System is not in service and this Function is not required to be OPERABLE.

6. Auxiliary Feedwater

The AFW System is designed to provide a secondary side heat sink for the reactor in the event that the MFW System is not available. The system has two motor driven pumps and a turbine driven pump, making it available during normal and accident operation. The normal source of water for the AFW System is the condensate storage system (not safety related). A low suction pressure to the AFW pumps will automatically realign the pump suctions to the Nuclear Service Water System (NSWS)(safety related). The AFW System is aligned so that upon a pump start, flow is initiated to the respective SGs immediately.

a. Auxiliary Feedwater-Automatic Actuation Logic and Actuation Relays

Automatic actuation logic and actuation relays consist of the same features and operate in the same manner as described for ESFAS Function 1.b.

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

b. Auxiliary Feedwater-Steam Generator Water Level-Low Low

SG Water Level-Low Low provides protection against a loss of heat sink. A feed line break, inside or outside of containment, or a loss of MFW, would result in a loss of SG water level. SG Water Level-Low Low provides input to the SG Level Control System. Therefore, the actuation logic must be able to withstand both an input failure to the control system which may then require a protection function actuation and a single failure in the other channels providing the protection function actuation. Thus, four OPERABLE channels are required to satisfy the requirements with two-out-of-four logic. The setpoints are based on percent of narrow range instrument span.

SG Water Level—Low Low in any operating SG will cause the motor driven AFW pumps to start. The system is aligned so that upon a start of the pump, water immediately begins to flow to the SGs. SG Water Level—Low Low in any two operating SGs will cause the turbine driven pumps to start.

c. Auxiliary Feedwater—Safety Injection

An SI signal starts the motor driven AFW pumps. The AFW initiation functions are the same as the requirements for their SI function. Therefore, the requirements are not repeated in Table 3.3.2-1. Instead, Function 1, SI, is referenced for all initiating functions and requirements.

d. Auxiliary Feedwater-Loss of Offsite Power

A loss of offsite power to the service buses will be accompanied by a loss of reactor coolant pumping power and the subsequent need for some method of decay heat removal. The loss of offsite power is detected by a voltage drop on each essential service bus. Loss of power to either essential service bus will start the turbine driven and motor driven AFW pumps to ensure that at least two SGs contain enough water to serve as the heat sink for reactor decay heat and sensible heat removal following the reactor trip.

Functions 6.a through 6.d must be OPERABLE in MODES 1, 2, and 3 to ensure that the SGs remain the heat sink for the reactor. These Functions do not have to be OPERABLE in MODES 5 and 6

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

because there is not enough heat being generated in the reactor to require the SGs as a heat sink. In MODE 4, AFW actuation does not need to be OPERABLE because either AFW or residual heat removal (RHR) will already be in operation to remove decay heat or sufficient time is available to manually place either system in operation.

e. Auxiliary Feedwater-Trip of All Main Feedwater Pumps

A Trip of all MFW pumps is an indication of a loss of MFW and the subsequent need for some method of decay heat and sensible heat removal to bring the reactor back to no load temperature and pressure. Each turbine driven MFW pump is equipped with three pressure switches on the trip oil system. A low pressure signal from two-out-of-three of these pressure switches indicates a trip of that pump. Three OPERABLE channels per pump satisfy redundancy requirements with two-out-of-three logic. A trip of all MFW pumps starts the motor driven AFW pumps to ensure that at least two SGs are available with water to act as the heat sink for the reactor. This function must be OPERABLE in MODES 1 and 2. This ensures that at least two SGs are provided with water to serve as the heat sink to remove reactor decay heat and sensible heat in the event of an accident. In MODES 3, 4, and 5, the MFW pumps may be normally shut down, and thus neither pump trip is indicative of a condition requiring automatic AFW initiation.

f. Auxiliary Feedwater-Pump Suction Transfer on Suction Pressure-Low

A low pressure signal in the AFW pump suction line protects the AFW pumps against a loss of the normal supply of water for the pumps, the condensate storage system. Three pressure switches per train are located on the AFW pump suction line from the condensate storage system. A low pressure signal sensed by two-out-of-three switches will align their train related motor driven AFW pump and the turbine driven AFW pump to the assured water supply (NSWS). The NSWS (safety grade) is then lined up to supply the AFW pumps to ensure an adequate supply of water for the AFW System to maintain at least two of the SGs as the heat sink for reactor decay heat and sensible heat removal.

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

This Function must be OPERABLE in MODES 1, 2, and 3 to ensure a safety grade supply of water for the AFW System to maintain the SGs as the heat sink for the reactor. This Function does not have to be OPERABLE in MODES 5 and 6 because there is not enough heat being generated in the reactor to require the SGs as a heat sink. In MODE 4, AFW automatic suction transfer does not need to be OPERABLE because RHR will already be in operation, or sufficient time is available to place RHR in operation, to remove decay heat.

7. Automatic Switchover to Containment Sump

At the end of the injection phase of a LOCA, the RWST will be nearly empty. Continued cooling must be provided by the ECCS to remove decay heat. The source of water for the ECCS pumps is automatically switched to the containment recirculation sump. The low head residual heat removal (RHR) pumps and containment spray pumps draw the water from the containment recirculation sump, the RHR pumps pump the water through the RHR heat exchanger, inject the water back into the RCS, and supply the cooled water to the other ECCS pumps. Switchover from the RWST to the containment sump must occur before the RWST empties to prevent damage to the RHR pumps and a loss of core cooling capability.

a. Automatic Switchover to Containment Sump-
Automatic Actuation Logic and Actuation Relays

Automatic actuation logic and actuation relays consist of the same features and operate in the same manner as described for ESFAS Function 1.b.

b. Automatic Switchover to Containment
Sump-Refueling Water Storage Tank (RWST)
Level-Low Coincident With Safety Injection

During the injection phase of a LOCA, the RWST is the source of water for all ECCS pumps. A low level in the RWST coincident with an SI signal provides protection against a loss of water for the ECCS pumps and indicates the end of the injection phase of the LOCA. The RWST is equipped with four level transmitters. These transmitters provide no control functions. Since an inadvertent switchover to the containment sump could have a significant safety impact, this instrumentation is placed in a bypass condition

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

for testing. Therefore, four channels are supplied such that, during testing, the remaining three channels could perform the intended function, and no single failure could result in either a failure to accomplish the intended function, or in an inadvertent switchover to the containment sump.

Automatic switchover occurs only if the RWST low level signal is coincident with SI. This prevents accidental switchover during normal operation. Accidental switchover could damage ECCS pumps if they are attempting to take suction from an empty sump. The automatic switchover Function requirements for the SI Functions are the same as the requirements for their SI function. Therefore, the requirements are not repeated in Table 3.3.2-1. Instead, Function 1, SI, is referenced for all initiating Functions and requirements.

These Functions must be OPERABLE in MODES 1, 2, 3, and 4 when there is a potential for a LOCA to occur, to ensure a continued supply of water for the ECCS pumps. These Functions are not required to be OPERABLE in MODES 5 and 6 because there is adequate time for the operator to evaluate unit conditions and respond by manually starting systems, pumps, and other equipment to mitigate the consequences of an abnormal condition or accident. System pressure and temperature are very low and many ESF components are administratively locked out or otherwise prevented from actuating to prevent inadvertent overpressurization of unit systems.

8. Engineered Safety Feature Actuation System Interlocks

To allow some flexibility in unit operations, several interlocks are included as part of the ESFAS. These interlocks permit the operator to block some signals, automatically enable other signals, prevent some actions from occurring, and cause other actions to occur. The interlock Functions back up manual actions to ensure bypassable functions are in operation under the conditions assumed in the safety analyses.

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)**a. Engineered Safety Feature Actuation System Interlocks—Reactor Trip, P-4**

The P-4 interlock is enabled when a reactor trip breaker (RTB) and its associated bypass breaker is open. Operators are able to reset SI 60 seconds after initiation. If a P-4 is present when SI is reset, subsequent automatic SI initiations will be blocked until the RTBs have been manually closed. This Function allows operators to take manual control of SI systems after the initial phase of injection is complete while avoiding multiple SI initiations. The functions of the P-4 interlock are:

- Trip the main turbine;
- Isolate MFW with coincident low T_{avg} ;
- Prevent reactivation of SI after a manual reset of SI;
- Transfer the steam dump from the load rejection controller to the unit trip controller; and
- Prevent opening of the MFW isolation valves if they were closed on SI or SG Water Level—High High.

Each of the above Functions is interlocked with P-4 to avert or reduce the continued cooldown of the RCS following a reactor trip. An excessive cooldown of the RCS following a reactor trip could cause an insertion of positive reactivity with a subsequent increase in generated power. To avoid such a situation, the noted Functions have been interlocked with P-4 as part of the design of the unit control and protection system.

None of the noted Functions serves a mitigation function in the unit licensing basis safety analyses. Only the turbine trip Function is explicitly assumed since it is an immediate consequence of the reactor trip Function. Neither turbine trip, nor any of the other four Functions associated with the reactor trip signal, is required to show that the unit licensing basis safety analysis acceptance criteria are not exceeded.

The RTB position switches that provide input to the P-4 interlock only function to energize or de-energize or open or close contacts. Therefore, this Function has no adjustable

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

trip setpoint with which to associate a Trip Setpoint and Allowable Value.

This Function must be OPERABLE in MODES 1, 2, and 3 when the reactor may be critical or approaching criticality. This Function does not have to be OPERABLE in MODE 4, 5, or 6 because the main turbine, the MFW System, and the Steam Dump System are not in operation.

b. Engineered Safety Feature Actuation System Interlocks-Pressurizer Pressure, P-11

The P-11 interlock permits a normal unit cooldown and depressurization without actuation of SI or main steam line isolation. With two-out-of-three pressurizer pressure channels (discussed previously) less than the P-11 setpoint, the operator can manually block the Pressurizer Pressure-Low SI signal and the Steam Line Pressure-Low steam line isolation signal (previously discussed). When the Steam Line Pressure-Low steam line isolation signal is manually blocked, a main steam isolation signal on Steam Line Pressure-Negative Rate-High is enabled. This provides protection for an SLB by closure of the MSIVs. With two-out-of-three pressurizer pressure channels above the P-11 setpoint, the Pressurizer Pressure-Low SI signal and the Steam Line Pressure-Low steam line isolation signal are automatically enabled. The operator can also enable these trips by use of the respective manual reset buttons. When the Steam Line Pressure-Low steam line isolation signal is enabled, the main steam isolation on Steam Line Pressure-Negative Rate—High is disabled.

This Function must be OPERABLE in MODES 1, 2, and 3 to allow an orderly cooldown and depressurization of the unit without the actuation of SI or main steam isolation. This Function does not have to be OPERABLE in MODE 4, 5, or 6 because system pressure must already be below the P-11 setpoint for the requirements of the heatup and cooldown curves to be met.

c. Engineered Safety Feature Actuation System Interlocks-T_{avg}-Low Low, P-12

On increasing reactor coolant temperature, the P-12 interlock provides an arming signal to the Steam Dump System. On a

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

decreasing temperature, the P-12 interlock removes the arming signal to the Steam Dump System to prevent an excessive cooldown of the RCS due to a malfunctioning Steam Dump System.

Since T_{avg} is used as an indication of bulk RCS temperature, this Function meets redundancy requirements with one OPERABLE channel in each loop. These channels are used in two-out-of-four logic. This Function must be OPERABLE in MODES 1, 2, and 3 when a secondary side break or stuck open valve could result in the rapid depressurization of the steam lines. This Function does not have to be OPERABLE in MODE 4, 5, or 6 because there is insufficient energy in the secondary side of the unit to have an accident.

9. Containment Pressure Control System Permissives

The Containment Pressure Control System (CPCS) protects the Containment Building from excessive depressurization by preventing inadvertent actuation or continuous operation of the Containment Spray and Containment Air Return Systems when containment pressure is at or less than the CPCS permissive setpoint. The control scheme of CPCS is comprised of eight independent control circuits (4 per train), each having a separate and independent pressure transmitter and current alarm module. Each pressure transmitter monitors the containment pressure and provides input to its respective current alarm. The current alarms are set to inhibit or terminate containment spray and containment air return systems when containment pressure falls to or below 0.25 psig. The alarm modules switch back to the permissive state (allowing the systems to operate) when containment pressure is greater than or equal to 0.45 psig.

This function must be OPERABLE in MODES 1, 2, 3, and 4 when there is sufficient energy in the primary and secondary sides to pressurize containment following a pipe break. In MODES 5 and 6, there is insufficient energy in the primary and secondary sides to significantly pressurize the containment.

10. Nuclear Service Water System Suction Transfer – Low Pit Level

Upon an emergency low pit level signal from either NSWS pit, interlocks isolate the NSWS from Lake Wylie, align NSWS to the standby nuclear service water pond, close particular crossover

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ACTIONS (continued)

- Phase B Isolation; and
- Automatic Switchover to Containment Sump.

This action addresses the train orientation of the SSPS and the master and slave relays. If one train is inoperable, 6 hours are allowed to restore the train to OPERABLE status. The specified Completion Time is reasonable considering that there is another train OPERABLE, and the low probability of an event occurring during this interval. If the train cannot be restored to OPERABLE status, the unit must be placed in a MODE in which the LCO does not apply. This is done by placing the unit in at least MODE 3 within an additional 6 hours (12 hours total time) and in MODE 5 within an additional 30 hours (42 hours total time). The Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

The Required Actions are modified by a Note that allows one train to be bypassed for up to 4 hours for surveillance testing, provided the other train is OPERABLE. The Required Actions are not required to be met during this time, unless the train is discovered inoperable during the testing. This allowance is based on the reliability analysis assumption of WCAP-10271-P-A (Ref. 7) that 4 hours is the average time required to perform channel surveillance.

D.1, D.2.1, and D.2.2

Condition D applies to:

- Containment Pressure-High;
- Pressurizer Pressure-Low;
- Steam Line Pressure-Low;
- Steam Line Pressure-Negative Rate-High;
- Loss of offsite power;
- SG Water level—Low Low; and
- SG Water level—High High (P-14) for the Feedwater Isolation Function.

BASES

ACTIONS (continued)

Functions, the available redundancy, and the low probability of an event occurring during this interval. If the Function cannot be returned to OPERABLE status, the unit must be placed in MODE 3 within the next 6 hours and MODE 4 within the following 6 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power in an orderly manner and without challenging unit systems. In MODE 4, the unit does not have any analyzed transients or conditions that require the explicit use of the protection functions noted above.

G.1 and G.2

Condition G applies to manual initiation of Steam Line Isolation.

This action addresses the operability of the manual steam line isolation function for each individual main steam isolation valve. If a channel is inoperable, 48 hours is allowed to return it to an OPERABLE status. If the train cannot be restored to OPERABLE status, the Conditions and Required Actions of LCO 3.7.2, "Main Steam Isolation Valves," must be entered for the associated inoperable valve. The specified Completion Time is reasonable considering that there is a system level manual initiation train for this Function and the low probability of an event occurring during this interval.

H.1, H.2.1 and H.2.2

Condition H applies to the automatic actuation logic and actuation relays for the Steam Line Isolation, Feedwater Isolation, and AFW actuation Functions.

The action addresses the train orientation of the SSPS and the master and slave relays for these functions. If one train is inoperable, 6 hours are allowed to restore the train to OPERABLE status. The Completion Time for restoring a train to OPERABLE status is reasonable considering that there is another train OPERABLE, and the low probability of an event occurring during this interval. If the train cannot be returned to OPERABLE status, the unit must be brought to MODE 3 within the next 6 hours and MODE 4 within the following 6 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly

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ACTIONS (continued)

manner and without challenging unit systems. Placing the unit in MODE 4 removes all requirements for OPERABILITY of the protection channels and actuation functions. In this MODE, the unit does not have analyzed transients or conditions that require the explicit use of the protection functions noted above.

The Required Actions are modified by a Note that allows one train to be bypassed for up to 4 hours for surveillance testing provided the other train is OPERABLE. This allowance is based on the reliability analysis (Ref. 7) assumption that 4 hours is the average time required to perform channel surveillance.

I.1 and I.2

Condition I applies to the automatic actuation logic and actuation relays for the Turbine Trip Function.

This action addresses the train orientation of the SSPS and the master and slave relays for this Function. If one train is inoperable, 6 hours are allowed to restore the train to OPERABLE status or the unit must be placed in MODE 3 within the following 6 hours. The Completion Time for restoring a train to OPERABLE status is reasonable considering that there is another train OPERABLE, and the low probability of an event occurring during this interval. The allowed Completion Time of 6 hours is reasonable, based on operating experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging unit systems. These Functions are no longer required in MODE 3. Placing the unit in MODE 3 removes all requirements for OPERABILITY of the protection channels and actuation functions. In this MODE, the unit does not have analyzed transients or conditions that require the explicit use of the protection functions noted above.

The Required Actions are modified by a Note that allows one train to be bypassed for up to 4 hours for surveillance testing provided the other train is OPERABLE. This allowance is based on the reliability analysis (Ref. 7) assumption that 4 hours is the average time required to perform channel surveillance.

BASES

ACTIONS (continued)

J.1 and J.2

Condition J applies to:

- SG Water Level—High High (P-14) for the Turbine Trip Function;
and
- T_{avg} -Low.

If one channel is inoperable, 6 hours are allowed to restore one channel to OPERABLE status or to place it in the tripped condition. If placed in the tripped condition, the Function is then in a partial trip condition where one-out-of-three logic will result in actuation. The 6 hour Completion Time is justified in Reference 7. Failure to restore the inoperable channel to OPERABLE status or place it in the tripped condition within 6 hours requires the unit to be placed in MODE 3 within the following 6 hours. The allowed Completion Time of 6 hours is reasonable, based on operating experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging unit systems. In MODE 3, these Functions are no longer required OPERABLE.

The Required Actions are modified by a Note that allows the inoperable channel to be bypassed for up to 4 hours for surveillance testing of other channels. The 6 hours allowed to place the inoperable channel in the tripped condition, and the 4 hours allowed for a second channel to be in the bypassed condition for testing, are justified in Reference 7.

K.1 and K.2

Condition K applies to the AFW pump start on trip of all MFW pumps.

This action addresses the auto start function of the AFW System on loss of all MFW pumps. The OPERABILITY of the AFW System must be assured by allowing automatic start of the AFW System pumps. If a channel is inoperable, 1 hour is allowed to return it to an OPERABLE status or to place the channel in trip. If the function cannot be returned to an OPERABLE status or placed in a trip condition, 6 hours are allowed to place the unit in MODE 3. The allowed Completion Time of 6 hours is reasonable, based on operating experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging unit systems. In MODE 3, the unit does not have any analyzed transients or conditions that require the explicit use of the protection function noted above.

BASES

ACTIONS (continued)

L.1

Condition L applies to the Doghouse Water Level – High High. The failure of one channel in either reactor building doghouse results in a loss of redundancy for the function and possible feedwater isolation (depending on the failed status of the channel). This requires the unit be placed in MODE 3 within 6 hours.

The allowed Completion Time is reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems. In Mode 3, this Function is no longer required OPERABLE.

The Required Actions are modified by a Note that allows this inoperable channel to be bypassed for up to 2 hours for surveillance testing of other channels.

M.1, M.2.1 and M.2.2

Condition M applies to the Auxiliary Feedwater Pumps Suction Transfer on Suction Pressure Low.

If one channel is inoperable, 1 hour is allowed to restore the channel to OPERABLE status or to place it in the tripped condition. The failure of one channel places the Function in a two-out-of-two configuration. One channel must be tripped to place the Function in a one-out-of-three configuration that satisfies redundancy requirements.

Failure to restore the inoperable channel to OPERABLE status or place it in the tripped condition within 1 hour requires the unit to be placed in MODE 3 within the following 6 hours and MODE 4 within the next 6 hours.

The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems. In MODE 4, this Function is no longer required OPERABLE.

BASES

ACTIONS (continued)**N.1, N.2.1 and N.2.2**

Condition N applies to:

- **RWST Level—Low Low Coincident with Safety Injection.**

RWST Level—Low Low Coincident With SI provides actuation of switchover to the containment sump. Note that this Function requires the bistables to energize to perform their required action. The failure of up to two channels will not prevent the operation of this Function. However, placing a failed channel in the tripped condition could result in a premature switchover to the sump, prior to the injection of the minimum volume from the RWST. Placing the inoperable channel in bypass results in a two-out-of-three logic configuration, which satisfies the requirement to allow another failure without disabling actuation of the switchover when required. Restoring the channel to OPERABLE status or placing the inoperable channel in the bypass condition within 6 hours is sufficient to ensure that the Function remains OPERABLE, and minimizes the time that the Function may be in a partial trip condition (assuming the inoperable channel has failed high). The 6 hour Completion Time is justified in Reference 7. If the channel cannot be returned to OPERABLE status or placed in the bypass condition within 6 hours, the unit must be brought to MODE 3 within the following 6 hours and MODE 5 within the next 30 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems. In MODE 5, the unit does not have any analyzed transients or conditions that require the explicit use of the protection functions noted above.

The Required Actions are modified by a Note that allows placing a second channel in the bypass condition for up to 2 hours for surveillance testing. The total of 12 hours to reach MODE 3 and 2 hours for a second channel to be bypassed is acceptable based on the results of Reference 7.

O.1, O.2.1 and O.2.2

Condition O applies to the P-11 and P-12 interlocks.

With one channel inoperable, the operator must verify that the interlock is in the required state for the existing unit condition. This action manually accomplishes the function of the interlock. Determination must be made within 1 hour. The 1 hour Completion Time is equal to the time allowed

BASES

ACTIONS (continued)

by LCO 3.0.3 to initiate shutdown actions in the event of a complete loss of ESFAS function. If the interlock is not in the required state (or placed in the required state) for the existing unit condition, the unit must be placed in MODE 3 within the next 6 hours and MODE 4 within the following 6 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems. Placing the unit in MODE 4 removes all requirements for OPERABILITY of these interlocks.

P.1

Condition P applies to the Containment Pressure Control System Start and Terminate Permissives.

With one or more channels inoperable, the affected containment spray and containment air return systems components must be declared inoperable immediately. The supported system LCOs provide the appropriate Required Actions and Completion Times for the equipment made inoperable by the inoperable channel. The immediate Completion Time is appropriate since the inoperable channel could prevent the supported equipment from starting when required. Additionally, protection from an inadvertent actuation may not be provided if the terminate function is not OPERABLE.

Q.1, Q.2, Q.3.1, and Q.3.2

With one channel of NSWS Suction Transfer - Low Pit Level inoperable in one or more NSWS pits, 4 hours are allowed to place it in the tripped condition or align the NSWS to the Standby NSWS Pond. The failure of one channel places the Function in a two-out-of-two configuration. The failed channel must either be tripped to place the Function in a one-out-of-two configuration that satisfies redundancy requirements, or the NSWS realigned to fulfill the safety function.

Failure to place the channel in the tripped condition or to realign the NSWS suction and discharge within 4 hours requires the unit be placed in MODE 3 within the following 6 hours and MODE 5 within the next 30 hours.

The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems. In

BASES

ACTIONS (continued)

MODE 5, this Function is no longer required OPERABLE.

R.1, R.2.1, and R.2.2

With two or more channels of NSWS Suction Transfer - Low Pit Level inoperable in one or more pits, the NSWS must be aligned to the Standby NSWS Pond within 4 hours. Failure to accomplish the realignment within 4 hours requires the unit be placed in MODE 3 within the following 6 hours and MODE 5 within the next 30 hours.

The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems. In MODE 5, this Function is no longer required OPERABLE.

BASES

**SURVEILLANCE
REQUIREMENTS**

The SRs for each ESFAS Function are identified by the SRs column of Table 3.3.2-1.

A Note has been added to the SR Table to clarify that Table 3.3.2-1 determines which SRs apply to which ESFAS Functions.

Note that each channel of process protection supplies both trains of the ESFAS. When testing channel I, train A and train B must be examined. Similarly, train A and train B must be examined when testing channel II, channel III, and channel IV (if applicable). The CHANNEL CALIBRATION and COTs are performed in a manner that is consistent with the assumptions used in analytically calculating the required channel accuracies.

SR 3.3.2.1

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

Agreement criteria are determined by the unit staff, based on a combination of the channel instrument uncertainties, including indication and reliability. If a channel is outside the criteria, it may be an indication that the sensor or the signal processing equipment has drifted outside its limit.

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

SR 3.3.2.2

SR 3.3.2.2 is the performance of an ACTUATION LOGIC TEST. The SSPS is tested every 31 days on a STAGGERED TEST BASIS, using the semiautomatic tester. The train being tested is placed in the bypass condition, thus preventing inadvertent actuation. Through the

BASES

SURVEILLANCE REQUIREMENTS (continued)

semiautomatic tester, all possible logic combinations, with and without applicable permissives, are tested for each protection function. In addition, the master relay coil is pulse tested for continuity. This verifies that the logic modules are OPERABLE and that there is an intact voltage signal path to the master relay coils. The Frequency of every 31 days on a STAGGERED TEST BASIS is adequate. It is based on industry operating experience, considering instrument reliability and operating history data.

SR 3.3.2.3

SR 3.3.2.3 is the performance of a TADOT every 31 days. This test is a check of the Loss of Offsite Power Function. Each Function is tested up to, and including, the master transfer relay coils.

This test also includes trip devices that provide actuation signals directly to the SSPS. The SR is modified by a Note that excludes final actuation of pumps and valves to minimize plant upsets that would occur. The Frequency is adequate based on operating experience, considering instrument reliability and operating history data.

SR 3.3.2.4

SR 3.3.2.4 is the performance of a MASTER RELAY TEST. The MASTER RELAY TEST is the energizing of the master relay, verifying contact operation and a low voltage continuity check of the slave relay coil. Upon master relay contact operation, a low voltage is injected to the slave relay coil. This voltage is insufficient to pick up the slave relay, but large enough to demonstrate signal path continuity. This test is performed every 31 days on a STAGGERED TEST BASIS. The time allowed for the testing (4 hours) and the surveillance interval are justified in Reference 7.

SR 3.3.2.5

SR 3.3.2.5 is the performance of a COT.

A COT is performed on each required channel to ensure the channel will perform the intended Function. The tested portion of the loop must trip within the Allowable Values specified in Table 3.3.2-1.

BASES

SURVEILLANCE REQUIREMENTS (continued)

The setpoint shall be left set consistent with the assumptions of the setpoint methodology.

The Frequency of 92 days is justified in Reference 7.

SR 3.3.2.6

SR 3.3.2.6 is the performance of a SLAVE RELAY TEST. The SLAVE RELAY TEST is the energizing of the slave relays. Contact operation is verified in one of two ways. Actuation equipment that may be operated in the design mitigation MODE is either allowed to function, or is placed in a condition where the relay contact operation can be verified without operation of the equipment. Actuation equipment that may not be operated in the design mitigation MODE is prevented from operation by the SLAVE RELAY TEST circuit. For this latter case, contact operation is verified by a continuity check of the circuit containing the slave relay. This test is performed every 92 days. The Frequency is adequate, based on industry operating experience, considering instrument reliability and operating history data.

SR 3.3.2.7

SR 3.3.2.7 is the performance of a COT on the RWST level and Containment Pressure Control Start and Terminate Permissives.

A COT is performed on each required channel to ensure the entire channel will perform the intended Function. Setpoints must be found within the Allowable Values specified in Table 3.3.1-1. This test is performed every 31 days. The Frequency is adequate, based on operating experience, considering instrument reliability and operating history data.

SR 3.3.2.8

SR 3.3.2.8 is the performance of a TADOT. This test is a check of the Manual Actuation Functions, AFW pump start on trip of all MFW pumps, AFW low suction pressure, Reactor Trip (P-4) Interlock, and Doghouse Water Level - High High Feedwater Isolation. It is performed every 18 months. Each Manual Actuation Function is tested up to, and including, the master relay coils. In some instances, the test includes actuation of the end device (i.e., pump starts, valve cycles, etc.). The Frequency is adequate, based on industry operating experience and is

BASES

SURVEILLANCE REQUIREMENTS (continued)

consistent with the typical refueling cycle. The SR is modified by a Note that excludes verification of setpoints during the TADOT for manual initiation Functions. The manual initiation Functions have no associated setpoints.

SR 3.3.2.9

SR 3.3.2.9 is the performance of a CHANNEL CALIBRATION.

A CHANNEL CALIBRATION is performed every 18 months, or approximately at every refueling. CHANNEL CALIBRATION is a complete check of the instrument loop, including the sensor. The test verifies that the channel responds to measured parameter within the necessary range and accuracy.

CHANNEL CALIBRATIONS must be performed consistent with the assumptions of the unit specific setpoint methodology.

The Frequency of 18 months is based on the assumption of an 18 month calibration interval in the determination of the magnitude of equipment drift in the setpoint methodology.

This SR is modified by a Note stating that this test should include verification that the time constants are adjusted to the prescribed values where applicable. The applicable time constants are shown in Table 3.3.2-1.

SR 3.3.2.10

This SR ensures the individual channel ESF RESPONSE TIMES are less than or equal to the maximum values assumed in the accident analysis. Response Time testing acceptance criteria are included in the UFSAR (Ref. 2). Individual component response times are not modeled in the analyses. The analyses model the overall or total elapsed time, from the point at which the parameter exceeds the Trip Setpoint value at the sensor, to the point at which the equipment in both trains reaches the required functional state (e.g., pumps at rated discharge pressure, valves in full open or closed position).

For channels that include dynamic transfer functions (e.g., lag, lead/lag, rate/lag, etc.), the response time test may be performed with the transfer functions set to one with the resulting measured response time compared to the appropriate UFSAR response time. Alternately, the response time

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SURVEILLANCE REQUIREMENTS (continued)

test can be performed with the time constants set to their nominal value provided the required response time is analytically calculated assuming the time constants are set at their nominal values. The response time may be measured by a series of overlapping tests such that the entire response time is measured.

Response time may be verified by actual response time tests in any series of sequential, overlapping or total channel measurements, or by the summation of allocated sensor, signal processing and actuation logic response times with actual response time tests on the remainder of the channel. Allocations for sensor response times may be obtained from: (1) historical records based on acceptable response time tests (hydraulic, noise, or power interrupt tests), (2) in place, onsite, or offsite (e.g. vendor) test measurements, or (3) utilizing vendor engineering specifications. WCAP-13632-P-A Revision 2, "Elimination of Pressure Sensor Response Time Testing Requirements" provides the basis and methodology for using allocated sensor response times in the overall verification of the channel response time for specific sensors identified in the WCAP. In addition, while not specifically identified in the WCAP, ITT Barton 386A and 580A-0 sensors were compared to sensors which were identified. It was concluded that the WCAP results could be applied to these two sensor types as well. Response time verification for other sensor types must be demonstrated by test.

WCAP-14036-P-A Revision 1, "Elimination of Periodic Protection Channel Response Time Tests" provides the basis and methodology for using allocated signal processing and actuation logic response times in the overall verification of the protection system channel response time. The allocations for sensor, signal conditioning and actuation logic response times must be verified prior to placing the component in operational service and re-verified following maintenance that may adversely affect response time. In general, electrical repair work does not impact response time provided the parts used for repair are of the same type and value. Specific components identified in the WCAP may be replaced without verification testing. One example where response time could be affected is replacing the sensing assembly of a transmitter.

ESF RESPONSE TIME tests are conducted on an 18 month STAGGERED TEST BASIS. Testing of the final actuation devices, which make up the bulk of the response time, is included in the testing of each channel. The final actuation device in one train is tested with each channel. Therefore, staggered testing results in response time verification of these devices every 18 months. The 18 month Frequency is consistent with the typical refueling cycle and is based on unit

BASES

SURVEILLANCE REQUIREMENTS (continued)

operating experience, which shows that random failures of instrumentation components causing serious response time degradation, but not channel failure, are infrequent occurrences.

This SR is modified by a Note that clarifies that the turbine driven AFW pump is tested within 24 hours after reaching 600 psig in the SGs.

SR 3.3.2.11

SR 3.3.2.11 is the performance of a COT on the NSW Suction Transfer - Low Pit Level.

A COT is performed on each required channel to ensure the entire channel will perform the intended Function. Setpoints must be found within the Allowable Values specified in Table 3.3.2-1. This test is performed every 18 months. The Frequency is adequate based on operating experience.

SR 3.3.2.12

SR 3.3.2.12 is the performance of an ACTUATION LOGIC TEST on the NSW Suction Transfer-Emergency Low Pit Level.

An ACTUATION LOGIC TEST to satisfy the requirements of GL 96-01 is performed on each NSW Pit Suction Transfer instrumentation to ensure all combinations will initiate a transfer to the SNSWP. This test is performed every 18 months. The Frequency is adequate based on operating experience.

BASES

REFERENCES

1. UFSAR, Chapter 6.
2. UFSAR, Chapter 7.
3. UFSAR, Chapter 15.
4. IEEE-279-1971.
5. 10 CFR 50.49.
6. 10 CFR 50.36, Technical Specifications, (c)(2)(ii).
7. WCAP-10271-P-A, Supplement 1 and Supplement 2, Rev. 1, May 1986 and June 1990.
8. WCAP-13632-P-A Revision 2, "Elimination of Pressure Sensor Response Time Testing Requirements" Sep., 1995.
9. WCAP-14036-P-A Revision 1, "Elimination of Periodic Protection Channel Response Time Tests" Oct., 1998.