(WOG-6, Rev. 0)	•	TSTF-19, Rev. 1
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Industry/TSTF Standard Technical Specification Change Traveler

Relocate the details of RTD and thermocouple calibration from the Channel Calibration definition

Priority/Classification 2) Consistency/Standardization				 			
NUREGS Affected:]]]	1430		1431	1432	1433	1434
Description:					 		

Relocate the details of RTD and thermocouple calibration from the Channel Calibration definition to the Bases associated with calibration of these components.

Justification:

The details associated with defining acceptable means by which a channel calibration can be accomplished for RTDs and thermocouples is proposed to be relocated to the Bases associated with the calibration of these components. The information contained in the definition is prescriptive in nature, better suited as Bases information consistent with other material relocated to the Bases.

Revision History

OG Revision 0	Revision Status: Closed
Revision Proposed by:	Ginna
Revision Description: Original Issue	
Owners Group Rev	iew Information
Date Originated by OG:	02-Nov-95
Owners Group Commen (No Comments)	ls
Owners Group Resolutio	n: Approved Date: 02-Nov-95
TSTF Review Infor	mation
TSTF Received Date:	02-Nov-95 Date Distributed for Review 02-Nov-95
OG Review Completed:	🗹 BWOG 🗹 WOG 🗹 CEOG 🗹 BWROG
TSTF Comments: (No Comments)	
TSTF Resolution: Ap	proved Date: 14-Nov-95

4/2/98

NRC Review Information
NRC Received Date: 16-Noy-95 NRC Reviewer: R. Giardina
NRC Comments:
 11/19/95 - reviewer modified package. 12/7/95 - pkg to C. Grimes to review 6/11/96 - C. Grimes comment: TSTF-19 to be referred to a Tech Br. 9/18/96 - No change in status. 10/30/96 - Awaiting ICSB for support. 12/31/96 - NRC requested changes to TSTF-19. TSTF considering. 1/31/97 - Revision sent to TSTF for review. 3/28/97 - Revision forwarded to NRC.
Final Resolution: Superceded by Revision Final Resolution Date: 07-Apr-97
TSTF Revision 1Revision Status: ActiveNext Action:
Revision Proposed by: NRC
Revision Description: Letter from C. I. Grimes to James Davis dated 12/31/96 requested modifications to TSTF-19. 1) Remove the sentence, ",which may consist of an inplace qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel," and 2) add inserts similar to Insert 1 and 2 to BWOG SR 3.3.1.6, SR 3.3.17.2, SR 3.3.18.3, WOG SR 3.3.3.2, 3.3.4.3, and CEOG (analog and digital) 3.3.11.2 and 3.3.12.3.
TSTF Review Information
TSTF Received Date: 31-Dec-96 Date Distributed for Review 03-Feb-97
OG Review Completed: 🗹 BWOG 🗹 WOG 🗹 CEOG 🗹 BWROG
TSTF Comments: (No Comments)
TSTF Resolution. Approved Date: 21-Mar-97
NRC Review Information
NRC Received Date: 07-Apr-97 NRC Reviewer: R. Giardina
NRC Comments: 4/10/97 - Forwarded to reviewer. 10/6/97 HICB recommended approval. 10/8/97 - to C. Schulten for TSB recommendation. 10/1/97 - NRC indicated that they would approve. 10/6/97 - HICB recommended approval.
Final Resolution:NRC ApprovesFinal Resolution Date: 01-Dcc-97
Incorporation Into the NUREGs
File to BBS/LAN Date:TSTF Informed Date:TSTF Approved Date:
NUREG Rev Incorporated:

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(WOG-6, Rev. 0)

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1.1	Definition of Channel Calibration	
SR 3.3.1.6 Bases	RPS Instrumentation	NUREG(s)- 1430 Only
SR 3.3.17.2 Bases	PAM Instrumentation	NUREG(s)- 1430 Only
SR 3.3.18.3 Bases	Remote Shutdown System	NUREG(s)- 1430 Only
SR 3.3.1.12 Bases	RTS Instrumentation	NUREG(s)- 1431 Only
SR 3.3.3.2 Bases	PAM Instrumentation	NUREG(s)- 1431 Only
SR 3.3.4.3 Bases	Remote Shutdown System	NUREG(s)- 1431 Only
SR 3.3.11.2 Bases	PAM Instrumentation (Analog)	NUREG(s)- 1432 Only
SR 3.3.11.2 Bases	PAM Instrumentation (Digital)	NUREG(s)- 1432 Only
SR 3.3.12.3 Bases	Remote Shutdown System (Analog)	NUREG(s)- 1432 Only
SR 3.3.12.3 Bases	Remote Shutdown System (Digital)	NUREG(s)- 1432 Only

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INSERT 1

Whenever a sensing element is replaced, the next required CHANNEL CALIBRATION of the resistance temperature detectors (RTD) sensors is accomplished by an inplace cross calibration that compares the other sensing elements with the recently installed sensing element.

INSERT 2

Whenever a sensing element is replaced, the next required CHANNEL CALIBRATION of the Core Exit thermocouple sensors is accomplished by an inplace cross calibration that compares the other sensing elements with the recently installed sensing element.

Definitions 1.1 TSTF-19, Rev. 1

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1.0 USE AND APPLICATION

1.1 Definitions

The defined terms of this section appear in capitalized type and are applicable throughout these Technical Specifications and Bases.

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Term	Definition
ACTIONS	ACTIONS shall be that part of a Specification that prescribes Required Actions to be taken under designated Conditions within specified Completion Times.
ALLOWABLE THERMAL POWER	ALLOWABLE THERMAL POWER shall be the maximum reactor core heat transfer rate to the reactor coolant permitted by consideration of the number and configuration of reactor coolant pumps (RCPs) in operation.
AXIAL POWER IMBALANCE	AXIAL POWER IMBALANCE shall be the power in the top half of the core, expressed as a percentage of RATED THERMAL POWER (RTP), minus the power in the bottom half of the core, expressed as a percentage of RTP.
AXIAL POWER SHAPING RODS (APSRs)	APSRs shall be control components used to control the axial power distribution of the reactor core. The APSRs are positioned manually by the operator and are not trippable.
CHANNEL CALIBRATION 	A CHANNEL CALIBRATION shall be the adjustment, as necessary, of the channel output such that it responds within the necessary range and accuracy to known values of the parameter that the channel monitors. The CHANNEL CALIBRATION shall encompass the entire channel, including the required sensor, alarm, display, and trip functions, and shall include the CHANNEL FUNCTIONAL TEST. Calibration of instrument channels with resistance temperature detector (RTD) or thermocouple sensors may consist of an inplace qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel.

(continued)

BWOG STS

1.1 Definitions

TSTF-19, Rev. 1 CHANNEL CALIBRATION sensing element is replaced, the next required (continued) CHANNEL CALIBRATION shall include an inplace eross calibration that compares the other sensing -olements with the recently installed sensingthe CHANNEL CALIBRATION may be performed by means of any series of sequential, overlapping, or total channel steps so that the entire channel is calibrated. The CHANNEL CALIBRATION shall also include testing of safety related Reactor Protection System (RPS), Engineered Safety Feature Actuation System (ESFAS), and Emergency Feedwater Initiation and Control (EFIC) bypass functions for each channel affected by the bypass operation. CHANNEL CHECK A CHANNEL CHECK shall be the qualitative assessment, by observation, of channel behavior during operation. This determination shall include, where possible, comparison of the channel indication and status to other indications or status derived from independent instrument channels measuring the same parameter. CHANNEL FUNCTIONAL TEST A CHANNEL FUNCTIONAL TEST shall be the injection of a simulated or actual signal into the channel as close to the sensor as practicable to verify OPERABILITY, including required alarms. interlocks, display, and trip functions. The ESFAS CHANNEL FUNCTIONAL TEST shall also include testing of ESFAS safety related bypass functions for each channel affected by bypass operation. CONTROL RODS CONTROL RODS shall be all full length safety and regulating rods that are used to shut down the reactor and control power level during maneuvering operations. i CORE ALTERATION CORE ALTERATION shall be the movement of any fuel, sources, or reactivity control components, within

the reactor vessel with the vessel head removed and fuel in the vessel. Suspension of CORE

(continued)

Definitions

1.1

BWOG STS

RPS Instrumentation B 3.3.1 TSTF-19, Rev. 1

Insert.

BASES

SURVEILLANCE REQUIREMENTS

<u>SR 3.3.1.6</u> (continued)

A CHANNEL CALIBRATION is a complete check of the instrument channel, including the sensor. The test verifies that the channel responds to the measured parameter within the necessary range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drift to ensure that the instrument channel remains operational between successive tests. CHANNEL CALIBRATION shall find that measurement errors and bistable setpoint errors are within the assumptions of the unit specific setpoint analysis. CHANNEL CALIBRATIONS must be performed consistent with the assumptions of the unit specific setpoint analysis.

The Frequency is justified by the assumption of an [18] month calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis.

<u>SR 3.3.1.7</u>

This SR verifies individual channel actuation response times are less than or equal to the maximum values assumed in the accident analysis. 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 analytical limit at the sensor to the point of rod insertion. Response time testing acceptance criteria for this unit are included in Reference 1.

A Note to the Surveillance indicates that neutron detectors are excluded from RPS RESPONSE TIME testing. This Note is necessary because of the difficulty in generating an appropriate detector input signal. Excluding the detectors is acceptable because the principles of detector operation ensure a virtually instantaneous response.

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. Therefore, staggered testing results in response time verification of these devices every [18] months. The [18] month Frequency is based on unit operating experience, which shows that random failures of

(continued)

BWOG STS

PAM Instrumentation B 3.3.17 TSTF-19, Rev, 1

BASES

SR 3.3.17.2 SURVEILLANCE REQUIREMENTS A CHANNEL CALIBRATION is performed every [18] months or (continued) approximately at every refueling. CHANNEL CALIBRATION is a complete check of the instrument channel, including the sensor. This test verifies the channel responds to measured parameters within the necessary range and accuracy. A Note clarifies that the neutron detectors are not required to be tested as part of the CHANNEL CALIBRATION. There is no adjustment that can be made to the detectors. Furthermore, adjustment of the detectors is unnecessary because they are passive devices, with minimal drift. Slow changes in detector sensitivity are compensated for by performing the daily calorimetric calibration and the monthly axial channel calibration. For the Containment Area Radiation instrumentation, a CHANNEL CALIBRATION may consist of an electronic calibration of the channel, not including the detector, for range decades above 10 R/hr, and a one point calibration check of the detector below 10 R/hr with a gamma source. nsert The Frequency is based on operating experience and consistency with the typical industry refueling cycle and is justified by the assumption of an [18] month calibration interval in the determination of the magnitude of equipment drift.

REFERENCES

- [Unit Specific Documents (e.g., FSAR, NRC Regulatory Guide 1.97 SER letter).]
 - 2. Regulatory Guide 1.97.
 - 3. NUREG-0737, 1979.
 - 32-1177256-00, "Technical Basis for Reactor Vessel Level Indication System (RVLIS) Action Statement," April 10, 1990.

Remote Shutdown System _B 3.3.18

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SURVEILLANCE REQUIREMENTS	<u>SR_3.3.18.3</u> (continued)					
	because they are passive devices, with minimal drift. Slow . changes in detector sensitivity are compensated for by performing the daily calorimetric calibration and the monthly axial channel calibration.					
	The Frequency is based on operating experience and consistency with the typical industry refueling cycle and is justified by the assumption of an [18] month calibration interval in the determination of the magnitude of equipment drift.					

Definitions 1.1 TSTF-19, Res. 1

1.0 USE AND APPLICATION

1.1 Definitions

-----NOTE-----The defined terms of this section appear in capitalized type and are applicable throughout these Technical Specifications and Bases. Definition Term ACTIONS shall be that part of a Specification that ACTIONS prescribes Required Actions to be taken under designated Conditions within specified Completion Times. ACTUATION LOGIC TEST An ACTUATION LOGIC TEST shall be the application of various simulated or actual input combinations in conjunction with each possible interlock logic state and the verification of the required logic output. The ACTUATION LOGIC TEST, as a minimum, shall include a continuity check of output devices. AXIAL FLUX DIFFERENCE AFD shall be the difference in normalized flux signals between the [top and bottom halves of a (AFD) two section excore neutron detector]. A CHANNEL CALIBRATION shall be the adjustment, as CHANNEL CALIBRATION necessary, of the channel so that it responds within the required range and accuracy to known input. The CHANNEL CALIBRATION shall encompass the entire channel, including the required sensor, alarm, interlock, display, and trip functions. Calibration of instrument channels with resistance temperature detector (RTD) or thermocouple sensors may consist of an inplace qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel Whenever a sensing element is replaced, the next , •• · ; roquired-GHANNEL-CALIBRATION-shall-include-an inplace cross calibration that compares the other sensing-elemente with the recently installed sensing clement. The CHANNEL CALIBRATION may be performed by means of any series of sequential, overlapping calibrations or total channel steps so that the entire channel is calibrated.

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RTS Instrumentation B 3.3.1 TSTF19, Rev. 1

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.1.11 (continued)

plateau or preamp discriminator curves, evaluating those curves, and comparing the curves to the manufacturer's data. This Surveillance is not required for the NIS power range detectors for entry into MODE 2 or 1, and is not required for the NIS intermediate range detectors for entry into MODE 2, because the unit must be in at least MODE 2 to perform the test for the intermediate range detectors and MODE 1 for the power range detectors. The [18] month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown these components usually pass the Surveillance when performed on the [18] month Frequency.

<u>SR 3.3.1.12</u>

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SR 3.3.1.12 is the performance of a CHANNEL CALIBRATION, as described in SR 3.3.1.10, every [18] months. This SR is modified by a Note stating that this test shall include verification of the RCS resistance temperature detector (RTD) bypass loop flow rate (NSCOT)

This test will verify the rate lag compensation for flow from the core to the RTDs.

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

<u>SR 3.3.1.13</u>

SR.3.3.1.13 is the performance of a COT of RTS interlocks every [18] months.

The Frequency is based on the known reliability of the interlocks and the multichannel redundancy available, and has been shown to be acceptable through operating experience.

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PAM Instrumentation B 3.3.3

TSTF-19, Rev. 1

BASES

SURVEILLANCE REQUIREMENTS

<u>SR 3.3.1</u> (continued)

should be compared to similar unit instruments located throughout the unit.

Agreement criteria are determined by the unit staff, based on a combination of the channel instrument uncertainties, including isolation, indication, and readability. 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. If the channels are within the criteria, it is an indication that the channels are OPERABLE.

As specified in the SR, a CHANNEL CHECK is only required for those channels that are normally energized.

The Frequency of 31 days is based on operating experience that demonstrates that 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.

<u>SR 3.3.3.2</u>

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 with the necessary range and accuracy. This SR is modified by a Note that excludes neutron detectors. The calibration method for neutron detectors is specified in the Bases of LCO 3.3.1, "Reactor Trip System (RTS) <u>Instrumentation."</u> The Frequency is based on operating experience and consistency with the typical industry refueling cycle.

REFERENCES

INSERT

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- 1. [Unit specific document (e.g., FSAR, NRC Regulatory Guide 1.97 SER letter).]
- 2. Regulatory Guide 1.97, [date].
- 3. NUREG-0737, Supplement 1, "TMI Action Items."

Remote Shutdown System B 3.3.4 TSTF-19, Rev. 1.

BASES

REQUIREMENTS

SURVEILLANCE <u>SR 3.3.4.1</u> (continued)

within the criteria, it is an indication that the channels are OPERABLE. 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.

As specified in the Surveillance, a CHANNEL CHECK is only required for those channels which are normally energized.

The Frequency of 31 days is based upon operating experience which demonstrates that 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.

<u>SR 3.3.4.2</u>

SR 3.3.4.2 verifies each required Remote Shutdown System control circuit and transfer switch performs the intended function. This verification is performed from the remote shutdown panel and locally, as appropriate. Operation of the equipment from the remote shutdown panel is not necessary. The Surveillance can be satisfied by performance of a continuity check. This will ensure that if the control room becomes inaccessible, the unit can be placed and maintained in MODE 3 from the remote shutdown panel and the local control stations. The [18] month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. (However, this Surveillance is not required to be performed only during a unit outage.) Operating experience demonstrates that remote shutdown control channels usually pass the Surveillance test when performed at the [18] month Frequency.

<u>SR 3.3.4.3</u>

CHANNEL CALIBRATION is a complete check of the instrument loop and the sensor. The test verifies that the channel responds to a measured parameter within the necessary range and accuracy.

Insert 1

(continued)

CHANNEL CALIBRATION (continued)	the entire channel, including the required sensor, alarm, display, and trip functions, and shall include the CHANNEL FUNCTIONAL TEST. Calibration of instrument channels with resistance temperature detector (RTD) or thermocouple sensors may consist of an inplace qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel. Whonover a sonsing element is replaced, the host required GHANNEL CALIBRATION shall include an inplace cross
· · · · /	eal-ibration that compares the other concing cloments with the recently installed concing cloment, The CHANNEL CALIBRATION may be performed by means of any series of sequential, overlapping, or total channel steps so that the entire channel is calibrated.
CHANNEL CHECK	A CHANNEL CHECK shall be the qualitative assessment, by observation, of channel behavior during operation. This determination shall include, where possible, comparison of the channel indication and status to other indications or status derived from independent instrument channels measuring the same parameter.
CHANNEL FUNCTIONAL TEST	A CHANNEL FUNCTIONAL TEST shall be:
-	a. Analog and bistable channels—the injection of a simulated or actual signal into the channel as close to the sensor as practicable to verify OPERABILITY, including required alarms, interlocks, display and trip functions;
, •: ;	b. Digital computer channels—the use of diagnostic programs to test digital computer hardware and the injection of simulated process data into the channel to verify OPERABILITY, including alarm and trip functions.
	The CHANNEL FUNCTIONAL TEST may be performed by means of any series of sequential, overlapping, or total channel steps so that the entire channel is tested.

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PAM Instrumentation (Analog) B 3.3.11 TS 7F-19, Rev.1

SURVEILLANCE REQUIREMENTS	<u>SR 3.3.11.1</u> (continued)				
,	The Frequency of 31 days is based upon plant operating experience with regard to channel OPERABILITY and drift, which demonstrates that failure of more than one channel of a given Function in any 31 day interval is a rare event. The CHANNEL CHECK supplements less formal, but more frequent, checks of channel during normal operational use of the displays associated with this LCO's required channels.				
	<u>SR_3.3.11.2</u>				
	A CHANNEL CALIBRATION is performed every [18] months or approximately every refueling. CHANNEL CALIBRATION is a complete check of the instrument channel including the sensor. The Surveillance verifies the channel responds to the measured parameter within the necessary range and accuracy. A Note allows exclusion of neutron detectors from the CHANNEL CALIBRATION.				
	At this unit, CHANNEL CALIBRATION shall find measurement errors are within the following acceptance criteria:				
Insert 2	For the Containment Area Radiation instrumentation, a CHANNEL CALIBRATION may consist of an electronic calibration of the channel, not including the detector, for range decades above 10 R/hr, and a one point calibration check of the detector below 10 R/hr with a gamma source.				
Insert 2	The Frequency is based upon operating experience and consistency with the typical industry refueling cycle and is justified by an [18] month calibration interval for the determination of the magnitude of equipment drift.				
REFERENCES	 Plant specific document (e.g., FSAR, NRC Regulatory Guide 1.97, SER letter). 				
	2. Regulatory Guide 1.97.				
	3. NUREG-0737, Supplement 1.				
	4. NRC Safety Evaluation Report (SER).				

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BASES

Remote Shutdown System (Analog) B 3.3.12 TSTF-19, Rev. 1

BASES	
SURVEILLANCE REQUIREMENTS	<u>SR 3.3.12.3</u> (continued) that the channel responds to the measured parameter within
Insert 1)-	the necessary range and accuracy. The 18 month Frequency is based upon the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power.
	The SR is modified by a Note, which excludes neutron detectors from the CHANNEL CALIBRATION.
	<u>SR 3.3.12.4</u> SR 3.3.12.4 is the performance of a CHANNEL FUNCTIONAL TEST every 18 months. This Surveillance should verify the OPERABILITY of the reactor trip circuit breaker (RTCB) open/closed indication on the remote shutdown panels by actuating the RTCBs. The Frequency of 18 months was chosen because the RTCBs cannot be exercised while the unit is at power. Operating experience has shown that these components usually pass the Surveillance when performed at a Frequency of once every 18 months. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.
REFERENCES	 10 CFR 50, Appendix A, GDC 19, and Appendix R. 2. NRC Safety Evaluation Report (SER).

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PAM Instrumentation (Digital) B 3.3.11 TSTF-19, Res.<u>1</u>-

BASES

SURVEILLANCE <u>SR_3.3.11.1</u> (continued)

REQUIREMENTS

<u>3.3.11.1</u> (continued)

which demonstrates that failure of more than one channel of a given Function in any 31 day interval is a rare event. The CHANNEL CHECK supplements less formal, but more frequent, checks of channel during normal operational use of the displays associated with this LCO's required channels.

<u>SR 3.3.11.2</u>

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

• At this unit, CHANNEL CALIBRATION shall find measurement __errors are within the following acceptance criteria:

For the Containment Area Radiation instrumentation, a CHANNEL CALIBRATION may consist of an electronic calibration of the channel, not including the detector, for range decades above 10 R/hr, and a one point calibration check of the detector below 10 R/hr with a gamma source.

The Frequency is based upon operating experience and consistency with the typical industry refueling cycle and is justified by the assumption of an [18] month calibration interval for the determination of the magnitude of equipment drift.

REFERENCES	1.	[Plant specific document (e.g., FSAR, NRC Regulator,	у
		Guide 1.97, SER letter).]	

- 2. Regulatory Guide 1.97.
- 3. NUREG-0737, Supplement 1.
- 4. NRC Safety Evaluation Report (SER).

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Remote Shutdown System (Digital) B 3.3.12

757F-19, Rev. 1

SURVEILLANCE REQUIREMENTS

BASES

<u>SR 3.3.12.1</u> (continued)

CHANNEL CALIBRATION. Agreement criteria are determined by the plant staff, based on a combination of the channel instrument uncertainties, including indication and readability. If a channel is outside the criteria, it may be an indication that the sensor or the signal processing equipment has drifted outside its limit. As specified in the Surveillance, a CHANNEL CHECK is only required for those channels that are normally energized.

The Frequency is based on plant operating experience that demonstrates channel failure is rare.

<u>SR 3.3.12.2</u>

SR 3.3.12.2 verifies that each required Remote Shutdown System transfer switch and control circuit performs its intended function. This verification is performed from the reactor shutdown panel and locally, as appropriate. Operation of the equipment from the remote shutdown panel is not necessary. The Surveillance can be satisfied by performance of a continuity check. This will ensure that if the control room becomes inaccessible, the plant can be brought to and maintained in MODE 3 from the reactor shutdown panel and the local control stations. The [18] month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience demonstrates that Remote Shutdown System control channels seldom fail to pass the Surveillance when performed at a Frequency of once every [18] months.

<u>SR 3.3.12.3</u>

CHANNEL CALIBRATION is a complete check of the instrument channel including the sensor. The Surveillance verifies that the channel responds to the measured parameter within the necessary range and accuracy.

The [18] month Frequency is based on the need to perform this Surveillance under the conditions that apply during a

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