

Industry/TSTF Standard Technical Specification Change Traveler

Fuel Storage Pool Verification

Priority/Classification 1) Correct Specifications

NUREGs Affected: 1430 1431 1432 1433 1434

Description:

Required Action A.2.2 is to verify by administrative means that a fuel storage pool verification has been performed since the last fuel movement. This Required Action should be changed to perform a fuel storage pool verification.

Justification:

The Bases for Actions A.1, A.2 and A.3 (which incidentally should be A.1, A.2.1 and A.2.2) indicates that verification of fuel storage pool fuel locations can be performed by administrative means.

If a fuel storage pool verification had been performed since the last fuel movement as verified by existing Action A.2.2, the plant would not be in the condition specified by the Applicability. Therefore, a change to the Action is required.

Revision History

OG Revision 0

Revision Status: Closed

Revision Proposed by: Palo Verde

Revision Description:
Original Issue

Owners Group Review Information

Date Originated by OG: 14-Mar-96

Owners Group Comments
(No Comments)

Owners Group Resolution: Approved Date: 14-Mar-96

TSTF Review Information

TSTF Received Date: 12-Apr-96 Date Distributed for Review 12-Apr-96

OG Review Completed: BWOG WOG CEOG BWROG

TSTF Comments:

BWOG - Applies. change note to "Initiate Action to Perform".

WOG - Applies. Need Bases revision.

TSTF Resolution: Approved Date: 30-Apr-96

NRC Review Information

NRC Received Date: 17-Jul-96 NRC Reviewer: R. Giardina

NRC Comments:

9/18/96 - Approved

3/30/97 - During review of the TSB files, determined that marked up pages for NUREGS 1430 had been omitted from the package. A revision was prepared which included those pages and was provided to the NRC on 3/18/97.

Final Resolution: NRC Approves

Final Resolution Date: 18-Sep-96

4/2/98

TSTF Revision 1**Revision Status: Active****Next Action:**

Revision Proposed by: BWOG

Revision Description:

The BWOG (NUREG-1430) markups were omitted from TSTF-70 . This revision includes those pages.

TSTF Review Information

TSTF Received Date: 01-Feb-97

Date Distributed for Review 01-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: M. Weston

NRC Comments:

(No Comments)

Final Resolution: NRC Approves

Final Resolution Date: 02-May-97

Incorporation Into the NUREGs

File to BBS/LAN Date:

TSTF Informed Date: 14-Jan-97

TSTF Approved Date:

NUREG Rev Incorporated:

Affected Technical Specifications

Action 3.7.15	Spent Fuel Pool Boron Concentration	NUREG(s)- 1430 Only
Action 3.7.15 Bases	Spent Fuel Pool Boron Concentration	NUREG(s)- 1430 Only
Action 3.7.16.A	Fuel Storage Pool Boron Concentration	NUREG(s)- 1431 Only
Action 3.7.16.A Bases	Fuel Storage Pool Boron Concentration	NUREG(s)- 1431 Only
Action 3.7.17.A	Fuel Storage Pool Boron Concentration	NUREG(s)- 1432 Only
Action 3.7.17.A Bases	Fuel Storage Pool Boron Concentration	NUREG(s)- 1432 Only

4/2/98

TSTF-70,
Rev. 1

3.7 PLANT SYSTEMS

3.7.15 Spent Fuel Pool Boron Concentration

LCO 3.7.15 The spent fuel pool boron concentration shall be \geq [500] ppm.

APPLICABILITY: When fuel assemblies are stored in the spent fuel pool and a spent fuel pool verification has not been performed since the last movement of fuel assemblies in the spent fuel pool.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>A. Spent fuel pool boron concentration not within limit.</p>	<p>-----NOTE----- LCO 3.0.3 is not applicable. -----</p>	
	<p>A.1 Suspend movement of fuel assemblies in the spent fuel pool.</p>	<p>Immediately</p>
	<p><u>AND</u></p> <p>A.2.1 Initiate action to restore spent fuel pool boron concentration to within limit.</p>	<p>Immediately</p>
	<p><u>OR</u></p> <p>A.2.2 Verify by administrative means a [Region 2] spent fuel pool verification has been performed since the last movement of fuel assemblies in the spent fuel pool.</p>	<p>Immediately</p>

Initiate action to perform a fuel storage pool verification.

~~Verify by administrative means a [Region 2] spent fuel pool verification has been performed since the last movement of fuel assemblies in the spent fuel pool.~~

BASES

APPLICABILITY
(continued)

verification has been performed following the last movement of fuel assemblies in the spent fuel pool. This LCO does not apply following the verification since the verification would confirm that there are no misloaded fuel assemblies. With no further fuel assembly movement in progress, there is no potential for a misloaded fuel assembly or a dropped fuel assembly.

ACTIONS

A.1, A.2.1, and A.2.2

The concentration of boron is restored simultaneously with suspending movement of the fuel assemblies.

The Required Actions are modified by a Note indicating that LCO 3.0.3 does not apply.

When the concentration of boron in the fuel storage pool is less than required, immediate action must be taken to preclude the occurrence of an accident or to mitigate the consequences of an accident in progress. This is most efficiently achieved by immediately suspending the movement of the fuel assemblies. This does not preclude movement of a fuel assembly to a safe position.

If moving irradiated fuel assemblies while in MODE 5 or 6, LCO 3.0.3 would not specify any action. If moving irradiated fuel assemblies while in MODE 1, 2, 3, or 4, the fuel movement is independent of reactor operation. Therefore, inability to suspend movement of fuel assemblies is not a sufficient reason to require a reactor shutdown.

SURVEILLANCE
REQUIREMENTS

This SR verifies that the concentration of boron in the fuel storage pool is within the required limit. As long as this SR is met, the analyzed incidents are fully addressed. The 7 day Frequency is appropriate because no major replenishment of pool water is expected to take place over a short period of time.

REFERENCES

None.

Alternately, beginning a verification of the spent fuel pool locations, to ensure proper locations of the fuel, can be performed. However, prior to resuming movement of fuel assemblies, the concentration of boron must be restored.

TSTF-70,
Rev. 1

3.7 PLANT SYSTEMS

3.7.16 Fuel Storage Pool Boron Concentration

LCO 3.7.16 The fuel storage pool boron concentration shall be \geq [2300] ppm.

APPLICABILITY: When fuel assemblies are stored in the fuel storage pool and a fuel storage pool verification has not been performed since the last movement of fuel assemblies in the fuel storage pool.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Fuel storage pool boron concentration not within limit.	-----NOTE----- LCO 3.0.3 is not applicable. -----	
	A.1 Suspend movement of fuel assemblies in the fuel storage pool.	Immediately
	<u>AND</u>	
	A.2.1 Initiate action to restore fuel storage pool boron concentration to within limit.	Immediately
	<u>OR</u>	
	A.2.2 Verify by administrative means [Region 2] fuel storage pool verification has been performed since the last movement of fuel assemblies in the fuel storage pool.	Immediately

Initiate action to perform a fuel storage pool verification

~~Verify by administrative means [Region 2] fuel storage pool verification has been performed since the last movement of fuel assemblies in the fuel storage pool.~~

TSTF-70,
Rev. 1

BASES

APPLICABILITY
(continued)

progress, there is no potential for a misloaded fuel assembly or a dropped fuel assembly.

ACTIONS

A.1, A.2.1, and A.2.2

The Required Actions are modified by a Note indicating that LCO 3.0.3 does not apply.

Alternatively, beginning a verification of the fuel storage pool fuel locations, to ensure proper locations of the fuel, can be performed

When the concentration of boron in the fuel storage pool is less than required, immediate action must be taken to preclude the occurrence of an accident or to mitigate the consequences of an accident in progress. This is most efficiently achieved by immediately suspending the movement of fuel assemblies. The concentration of boron is restored simultaneously with suspending movement of fuel assemblies.

~~An acceptable alternative is to verify by administrative means that the fuel storage pool verification has been performed since the last movement of fuel assemblies in the fuel storage pool. However, prior to resuming movement of fuel assemblies, the concentration of boron must be restored. This does not preclude movement of a fuel assembly to a safe position.~~

If the LCO is not met while moving irradiated fuel assemblies in MODE 5 or 6, LCO 3.0.3 would not be applicable. If moving irradiated fuel assemblies while in MODE 1, 2, 3, or 4, the fuel movement is independent of reactor operation. Therefore, inability to suspend movement of fuel assemblies is not sufficient reason to require a reactor shutdown.

SURVEILLANCE
REQUIREMENTS

SR 3.7.16.1

This SR verifies that the concentration of boron in the fuel storage pool is within the required limit. As long as this SR is met, the analyzed accidents are fully addressed. The 7 day Frequency is appropriate because no major replenishment of pool water is expected to take place over such a short period of time.

(continued)

TSTF-70,
Rev. 1

3.7 PLANT SYSTEMS

3.7.17 Fuel Storage Pool Boron Concentration

LCO 3.7.17 The fuel storage pool boron concentration shall be
≥ [2000] ppm.

APPLICABILITY: When fuel assemblies are stored in the fuel storage pool and a fuel storage pool verification has not been performed since the last movement of fuel assemblies in the fuel storage pool.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>A. Fuel storage pool boron concentration not within limit.</p>	<p>-----NOTE----- LCO 3.0.3 is not applicable. -----</p>	
	<p>A.1 Suspend movement of fuel assemblies in the fuel storage pool.</p>	<p>Immediately</p>
	<p><u>AND</u> A.2.1 Initiate action to restore fuel storage pool boron concentration to within limit.</p>	<p>Immediately</p>
<p><i>Initiate action to perform a fuel storage pool verification</i></p>	<p><u>OR</u> A.2.2 Verify by administrative means [Region 2] fuel storage pool verification has been performed since the last movement of fuel assemblies in the fuel storage pool.</p>	<p>Immediately</p>

BASES

APPLICABILITY
(continued)

verification has been performed following the last movement of fuel assemblies in the spent fuel pool. This LCO does not apply following the verification since the verification would confirm that there are no misloaded fuel assemblies. With no further fuel assembly movements in progress, there is no potential for a misloaded fuel assembly or a dropped fuel assembly.

ACTIONS

A.1, A.2, and A.3

The Required Actions are modified by a Note indicating that LCO 3.0.3 does not apply.

When the concentration of boron in the spent fuel pool is less than required, immediate action must be taken to preclude an accident from happening or to mitigate the consequences of an accident in progress. This is most efficiently achieved by immediately suspending the movement of fuel assemblies. This does not preclude the movement of fuel assemblies to a safe position. In addition, action must be immediately initiated to restore boron concentration to within limit. Alternately, ~~an immediate verification by administrative means~~ of the fuel storage pool fuel locations, to ensure proper locations of the fuel ~~since the last movement of fuel assemblies in the fuel storage pool~~, can be performed.

beginning

If moving irradiated fuel assemblies while in MODE 5 or 6, LCO 3.0.3 would not specify any action. If moving irradiated fuel assemblies while in MODE 1, 2, 3, or 4, the fuel movement is independent of reactor operation. Therefore, inability to suspend movement of fuel assemblies is not sufficient reason to require a reactor shutdown.

SURVEILLANCE
REQUIREMENTS

SR 3.7.17.1

This SR verifies that the concentration of boron in the spent fuel pool is within the required limit. As long as this SR is met, the analyzed incidents are fully addressed. The 7 day Frequency is appropriate because no major replenishment of pool water is expected to take place over a short period of time.

(continued)