(BWOG-29, Rev. 0)

TSTF-158, Rev. 1

2/17/98

3.1.5 Safety Rod Insertion Limits, Required Action A.1 Deletion
Priority/Classification 1) Correct Specifications
NUREGs Affected: 🗹 1430 📋 1431 📋 1432 📋 1433 📋 1434
Description: Delete Required Action A.1 and associated Completion Time from Specification 3.1.5 Actions.
Justification: NUREG 1430, Specification 3.1.5 Required Action and Completion Time A.1 are deleted and subsequent Required Actions are renumbered. This deletion is made because this Required Action is not necessary. Taking action to reestablish compliance with the LCO is always an option and need not be specified separately. Removal of this Required Action eliminates the potentially confusing specification of an action which is always an option in every Specification. This change neither adds any new requirements nor does it remove any requirements from this specification.
Revision History
OG Revision 0 Revision Status: Closed
Revision Proposed by: ANO-1
Revision Description: Original Issue
Owners Group Review Information Date Originated by OG: 01-Oct-96 Owners Group Comments Designated ANO-1-08
Owners Group Resolution: Approved Date: 17-Sep-96
TSTF Review Information
TSTF Received Date: 01-Nov-96 Date Distributed for Review 05-Dec-96
OG Review Completed: 🗹 BWOG 🗹 WOG 🗹 CEOG 🗹 BWROG
TSTF Comments:
CEOG - Not applicable, accepts WOG - Not applicable, accepts BWROG - Not applicable, accepts
Additional comments received from the BWOG on 1/13/97. On hold for resolution.
TSTF Resolution: Approved Date: 07-Jan-97

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	NRC Review Int	formation			
	NRC Received Date	24-Jan-97	NRC Reviewer:	Tjader, R.	
	NRC Comments:				
	NOTE: TSTF-155 th NRC was informed in	rough 160 were inad n February to ignore t	vertently submitted t the travelers until BV	o the NRC without BWOG a WOG review and approval c	approval. The ould be obtained.
	Final Resolution:	TSTF Withdraws		Final Resolution D	ate: 27-Mar-97
TSTF	Revision 1	Revision	Status: Active	Next Action:	EXCEL
	Revision Proposed by	y: BWOG			
	Revision Description After further review, was issued to facilita	: BWOG-29 (TSTF-1: te tracking.	58), was approved by	the BWOG without change	s. Revision 1
	<b>Owners</b> Group 1	Review Information	on		
	Date Originated by	OG: 06-Nov-97			
	Owners Group Common (No Comments)	nents			
	Owners Group Resol	ution: Approved	Date: 06-Nov-97		
	TSTF Review In	formation			
	TSTF Received Date	: 06-Nov-97	Date Distributed	for Review 06-Nov-97	
	OG Review Complet	ed: 🔽 BWOG 🗹 🕅	wog 🗹 Ceog 🖉	BWROG	
	TSTF Comments: (No Comments)				
	TSTF Resolution:	Approved Date:	05-Fcb-98		
Incorp	oration Into the l	NUREGS	· · · · · · · · · · · · · · · · · · ·		
File to B	BS/LAN Date:	TSTF Inf	ormed Date:	TSTF Approved I	Date:
NUREG	Rev Incorporated:				

## **Affected Technical Specifications**

Action 3.1.5.A	Safety Rod Insertion Limits		
Action 3.1.5.A Bases	Safety Rod Insertion Limits	 	 

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Safety Rod Insertion Limits . 3.1.5

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- 3.1 REACTIVITY CONTROL SYSTEMS
- 3.1.5 Safety Rod Insertion Limits

LCO 3.1.5 Each safety rod shall be fully withdrawn.

APPLICABILITY: MODES 1 and 2.

This LCO is not applicable while performing SR 3.1.4.2.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One safety rod not fully withdrawn.	A.2 Withdraw the rod fully. OP $R_2$ Verify SDM is A.1.1 $\geq 1\% \Delta k/k$ . k OR $R_2$ Initiate boration to A.1.2 Initiate boration to restore SDM to within limit. A.2 Declare the rod inoperable.	1 bour 1 hour 1 hour 1 hour

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Safety Rod Insertion Limit B 3.1.5

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BASES (continued)			
LCO	The safety groups must be fully withdrawn any time the reactor is critical or approaching criticality. This ensures that a sufficient amount of negative reactivity is available to shut down the reactor and maintain the required SDM following a reactor trip.		
APPLICABILITY	The safety groups must be within their insertion limits with the reactor in MODES 1 and 2. This ensures that a sufficient amount of negative reactivity is available to shut down the reactor and maintain the required SDM following a reactor trip. Refer to LCO 3.1.1 for SDM requirements in MODES 3, 4, and 5. LCO 3.9.1, "Boron Concentration," ensures adequate SDM in MODE 6.		
	This LCO has been modified by a Note indicating the LCO requirement is suspended during SR 3.1.4.2. This SR verifies the freedom of the rods to move, and requires the safety group to move below the LCO limits, which would normally violate the LCO.		
ACTIONS	(A.1.1, A.1.2 and A.23 (A.2. A.2.1.1 A.2. V.2. and A.2.R)		
	When one safety rod is not fully withdrawn, 1 hour is allowed to fully withdraw the rod. This is pecessary because the available SDM may be reduced with one of the safety rods not within insertion limits.		
(Safety)-	Alternatively, the rod models declared inoperable within the same 1 hour time frame. This requires entry into LCO 3.1.4, "CONTROL ROD Group Alignment Limits." In addition, since the rod may be inserted farther than the group average insertion for a long time, SDM must be evaluated. Ensuring the SDM meets the minimum requirement within 1 hour is adequate to determine that further degradation of the SDM is not occurring.		
	Restoration of the required SDM requires increasing the boron concentration, since the <u>CONTROL</u> ROD may remain safety ro misaligned and not be providing its normal negative reactivity on tripping. RCS boration must occur as described in Bases Section 3.1.1. The required Completion Time of 1 hour for initiating boration is reasonable, based		
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Safety Rod Insertion Limit B 3.1.5 TSTF-158 Rev.1

BASES

ACTIONS

## A.1.1, A.1.2 and A.2.3. A.1./A.2.1.1. A.R.1.2. and A.2.2 (continued)

on the time required for potential xenon redistribution, the low probability of an accident occurring, and the steps required to complete the action. This allows the operator sufficient time for aligning the required valves and starting the boric acid pumps. Boration will continue until the required SDM is restored.

The allowed Completion Time of 1 hour provides an acceptable time for evaluating and repairing minor problems without allowing the plant to remain in an unacceptable condition for an extended period of time.

## B.1.1 and B.1.2

When more than one safety rod is inoperable, there is a possibility that the required SDM may be adversely affected. Under these conditions, it is important to determine the SDM, and if it is less than the required value, initiate boration until the required SDM is recovered. The Completion Time of 1 hour is adequate for determining SDM and, if necessary, for initiating emergency boration to restore SDM.

In this situation, SDM verification must include the worth of the untrippable rod as well as the rod of maximum worth.

<u>B.2</u>

If more than one safety rod is inoperable the unit must be brought to a MODE where the LCO is not applicable. The allowed Completion Time of 6 hours is reasonable, based on operating experience, for reaching the required MODE from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE REQUIREMENTS

<u>SR 3.1.5.1</u>

Verification that each safety rod is fully withdrawn ensures the rods are available to provide reactor shutdown capability.

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