Industry/TSTF Standard Technical Specification Change Traveler

Move Notes from Conditions to Required Actions

Priority/Classification 1) Correct Specifications

NUREGs Affected: ☐ 1430 ☐ 1431 ☑ 1432 ☐ 1433 ☐ 1434

Description:

This change deletes Notes from Conditions in RPS Logic and Trip Initiation as the Notes are duplicative of, and are superseded by, LCO 3.0.5.

Justification:

The Notes address exceptions to the Required Actions. Specifically, RTCBs may be closed for testing for up to one hour when the RTCBs are required to be open to comply with the Required Actions. These exceptions to the Required Actions for the purpose of testing are unnecessary as the same allowance is given in LCO 3.0.5. Furthermore, the one hour given in the Notes is not limiting as LCO 3.0.5 allows as much time as is required to perform the required testing. Therefore, the Notes are duplicative and confusing and should be removed.

Revision History

OG Revision 0 **Revision Status: Active** **Next Action:**

Revision Proposed by: Calvert Cliffs

Revision Description:
Original Issue

Owners Group Review Information

Date Originated by OG: 24-Oct-96

Owners Group Comments
(No Comments)

Owners Group Resolution: Approved Date: 24-Oct-96

TSTF Review Information

TSTF Received Date: 04-Nov-96 Date Distributed for Review 20-Jan-97

OG Review Completed: ☑ BWOG ☑ WOG ☑ CEOG ☑ BWROG

TSTF Comments:

Revise to delete Notes as same allowance is given in LCO 3.0.5.
WOG - Not applicable, accepts
BWOG - Not applicable, accepts
BWROG - Not applicable, accepts

TSTF Resolution: Approved Date: 06-Mar-97

NRC Review Information

NRC Received Date: 27-Mar-97 NRC Reviewer: SCHULTEN,

NRC Comments:

4/7/97 Rec'd pkg
4/10/97 Forwarded to reviewer.

Final Resolution: NRC Approves Final Resolution Date: 06-Oct-97

Incorporation Into the NUREGs

File to BBS/LAN Date: TSTF Informed Date: TSTF Approved Date:

NUREG Rev Incorporated:

Affected Technical Specifications

Action 3.3.3.B	RPS Logic and Trip Initiation (Analog)
Action 3.3.3.B Bases	RPS Logic and Trip Initiation (Analog)
Action 3.3.3.C	RPS Logic and Trip Initiation (Analog)
Action 3.3.3.C Bases	RPS Logic and Trip Initiation (Analog)
Action 3.3.4.B	RPS Logic and Trip Initiation (Digital)
Action 3.3.4.B Bases	RPS Logic and Trip Initiation (Digital)
Action 3.3.4.C	RPS Logic and Trip Initiation (Digital)
Action 3.3.4.C Bases	RPS Logic and Trip Initiation (Digital)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. ~~----------NOTE----------~~ ~~RTCBs associated with one inoperable channel may be closed for up to 1 hour for the performance of an RPS CHANNEL FUNCTIONAL TEST.~~ ~~----------~~ One channel of Manual Trip, RTCBs, or Initiation Logic inoperable in MODE 1 or 2.	B.1 Open the affected RTCBs.	1 hour
C. ~~----------NOTE----------~~ ~~RTCBs associated with one inoperable channel may be closed for up to 1 hour for the performance of an RPS CHANNEL FUNCTIONAL TEST.~~ ~~----------~~ One channel of Manual Trip, RTCBs, or Initiation Logic inoperable in MODE 3, 4, or 5.	C.1 Open all RTCBs.	48 hours
D. Two channels of RTCBs or Initiation Logic affecting the same trip leg inoperable.	D.1 Open the affected RTCBs.	Immediately

(continued)

ACTIONS

B.1 (continued)

Therefore, a Note has been added specifying that the RTCBs associated with one inoperable channel may be closed for up to 1 hour for the performance of an RPS CHANNEL FUNCTIONAL TEST.

Required Action B.1 provides for opening the RTCBs associated with the inoperable channel within a Completion Time of 1 hour. This Required Action is conservative, since depressing the Manual Trip push button associated with either set of breakers in the other trip leg will cause a reactor trip. With this configuration, a single channel failure will not prevent a reactor trip. The allotted Completion Time is adequate to open the affected RTCBs while maintaining the risk of having them closed at an acceptable level.

C.1

Condition C applies to the failure of one Initiation Logic channel, RTCB channel, or Manual Trip channel affecting the same trip leg in MODE 3, 4, or 5 with the RTCBs closed. The channel must be restored to OPERABLE status within 48 hours. If the inoperable channel cannot be restored to OPERABLE status within 48 hours, all RTCBs must be opened, placing the plant in a MODE in which the LCO does not apply and ensuring no CEA withdrawal occurs.

The Completion Time of 48 hours is consistent with that of other RPS instrumentation and should be adequate to repair most failures.

Testing on the OPERABLE channels cannot be performed without causing a reactor trip unless the RTCBs in the inoperable channels are closed to permit testing. Therefore, a Note has been added specifying that the RTCBs associated with one inoperable channel may be closed for up to 1 hour for the performance of an RPS CHANNEL FUNCTIONAL TEST.

D.1

Condition D applies to the failure of both Initiation Logic channels affecting the same trip leg. Since this will open

(continued)

TSTF-181

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. ~~----------NOTE----------~~ ~~RTCBs associated with one inoperable channel may be closed for up to 1 hour for the performance of an RPS CHANNEL FUNCTIONAL TEST.~~ ~~----------~~ One channel of Manual Trip, RTCBs, or Initiation Logic inoperable in MODE 1 or 2.	B.1 Open the affected RTCBs.	1 hour
C. ~~----------NOTE----------~~ ~~RTCBs associated with one inoperable channel may be closed for up to 1 hour for the performance of an RPS CHANNEL FUNCTIONAL TEST.~~ ~~----------~~ One channel of Manual Trip, RTCBs, or Initiation Logic inoperable in MODE 3, 4, or 5.	C.1 Open all RTCBs.	48 hours
D. Two channels of RTCBs or Initiation Logic affecting the same trip leg inoperable.	D.1 Open the affected RTCBs.	Immediately

(continued)

TSTF-181

BASES

ACTIONS

A.1 (continued)

The channel must be restored to OPERABLE status within 48 hours. The Completion Time of 48 hours provides the operator time to take appropriate actions and still ensures that any risk involved in operating with a failed channel is acceptable. Operating experience has demonstrated that the probability of a random failure of a second Matrix Logic channel is low during any given 48 hour interval. If the channel cannot be restored to OPERABLE status within 48 hours, Condition E is entered.

B.1

Condition B applies to one Initiation Logic channel, RTCB channel, or Manual Trip channel in MODES 1 and 2, since they have the same actions. MODES 3, 4, and 5, with the RTCBs shut, are addressed in Condition C. These Required Actions require opening the affected RTCBs. This removes the need for the affected channel by performing its associated safety function. With an RTCB open, the affected Functions are in one-out-of-two logic, which meets redundancy requirements, but testing on the OPERABLE channels cannot be performed without causing a reactor trip unless the RTCBs in the inoperable channels are closed to permit testing. Therefore, a Note has been added specifying that the RTCBs associated with one inoperable channel may be closed for up to 1 hour for the performance of an RPS CHANNEL FUNCTIONAL TEST.

Required Action B.1 provides for opening the RTCBs associated with the inoperable channel within a Completion Time of 1 hour. This Required Action is conservative, since depressing the Manual Trip push button associated with either set of breakers in the other trip leg will cause a reactor trip. With this configuration, a single channel failure will not prevent a reactor trip. The allotted Completion Time is adequate for opening the affected RTCBs while maintaining the risk of having them closed at an acceptable level.

(continued)

ACTIONS (continued)

C.1

Condition C applies to the failure of one Initiation Logic channel, RTCB channel, or Manual Trip channel affecting the same trip leg in MODE 3, 4, or 5 with the RTCBs closed. The channel must be restored to OPERABLE status within 48 hours. If the inoperable channel cannot be restored to OPERABLE status within 48 hours, all RTCBs must be opened, placing the plant in a MODE in which the LCO does not apply and ensuring no CEA withdrawal occurs.

The Completion Time of 48 hours is consistent with that of other RPS instrumentation and should be adequate to repair most failures.

Testing on the OPERABLE channels cannot be performed without causing a reactor trip unless the RTCBs in the inoperable channels are closed to permit testing. Therefore, a Note has been added specifying that the RTCBs associated with one inoperable channel may be closed for up to 1 hour for the performance of an RPS CHANNEL FUNCTIONAL TEST.

D.1

Condition D applies to the failure of both Initiation Logic channels affecting the same trip leg. Since this will open two channels of RTCBs, this Condition is also applicable to channels in the same trip leg. This will open both sets of RTCBs in the affected trip leg, satisfying the Required Action of opening the affected RTCBs.

Of greater concern is the failure of the initiation circuit in a nontrip condition (e.g., due to two initiation K-relay failures). With only one Initiation Logic channel failed in a nontrip condition, there is still the redundant set of RTCBs in the trip leg. With both failed in a nontrip condition, the reactor will not trip automatically when required. In either case, the affected RTCBs must be opened immediately by using the appropriate Manual Trip push buttons, since each of the four push buttons opens one set of RTCBs, independent of the initiation circuitry. Caution must be exercised, since depressing the wrong push buttons may result in a reactor trip.

(continued)