

Industry/TSTF Standard Technical Specification Change Traveler

Add new Condition B to LCO 3.6.2.3, "RHR Suppression Pool Cooling"

Classification: 1) Correct Specifications

NUREGs Affected: 1430 1431 1432 1433 1434

Description:

Add a new ACTION (ACTION B) to NUREG-1433 and NUREG-1434, LCO 3.6.2.3, RHR Suppression Pool Cooling, to allow two RHR suppression pool cooling subsystems to be inoperable for 8 hours. In addition, the Bases are modified to address the new ACTION. Due to this change, the second part of NUREG-1433 and NUREG-1434 Condition B and been deleted and the entire ACTION B is renumbered to be ACTION C.

Justification:

The restoration time when both suppression pool cooling subsystems are inoperable is proposed to be changed to 8 hours. This time is consistent with the time provided in NUREG-1433, LCO 3.6.2.4, Suppression Pool Spray, when both suppression pool spray subsystems are inoperable, and with the time provided in NUREG-1434, LCO 3.6.1.7, Containment Spray, when both containment spray subsystems are inoperable. In addition, the Bases for NUREG-1433, LCO 3.7.1, ACTION D, when both RHR Service Water subsystems are inoperable states that the 8 hour Completion Time to restore one RHRSW subsystem is based on the Completion Times provided for RHR suppression pool cooling and spray functions (RHRSW provides the cooling to the RHR heat exchangers, which are required for the RHR suppression pool cooling function). The proposed 8 hour time is considered appropriate since an immediate plant shutdown (which is what is currently required in the ITS) has the potential for resulting in a unit scram and discharge of steam to the suppression pool, when both suppression pool cooling subsystems are inoperable and incapable of removing the generated heat. The 8 hours provides some time to restore one of the subsystems prior to requiring a unit shutdown (thus precluding the potential problem described above), yet is short enough that it does not significantly increase the probability of an accident to occur during this additional time. The NRC has also allowed many plants that had this allowance in their CTS to retain this allowance when they converted to the ITS, even though there was no plant specific justification, other than that it was allowed in their original CTS (i.e., Grand Gulf, Hatch Units 1 and 2, and Peach Bottom Units 2 and 3).

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NRC Contact:	Giardina, Bob	301-314-3152	lbb1@nrc.gov

Revision History

OG Revision 0 **Revision Status: Closed**

Revision Proposed by: Susquehanna

Revision Description:
Original Issue

Owners Group Review Information

Date Originated by OG: 19-May-97

Owners Group Comments
Replaced by Revision 1.

Owners Group Resolution: Superseded Date: 13-Aug-97

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

Revision Proposed by: BWROG

6/15/99

OG Revision 1**Revision Status: Active****Next Action:****Revision Description:**

Replaced Revision 1 description and justification, expanded to include BWR/6.

Owners Group Review Information

Date Originated by OG: 13-Aug-97

Owners Group Comments
(No Comments)

Owners Group Resolution: Approved Date: 13-Aug-97

TSTF Review Information

TSTF Received Date: 13-Aug-97 Date Distributed for Review 01-Dec-97

OG Review Completed: BWOG WOG CEOG BWROG**TSTF Comments:**

Add "or B" in LCO and Bases. BWR only.

TSTF Resolution: Approved Date: 05-Feb-98

NRC Review Information

NRC Received Date: 03-Mar-98

NRC Comments:
(No Comments)

Final Resolution: NRC Approves

Final Resolution Date: 07-Apr-98

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

Revision Proposed by: BWROG

Revision Description:

Deleted "of Condition A and B" from new Condition C to be consistent with Writer's Guide 4.1.6.I.5.

Owners Group Review Information

Date Originated by OG: 09-Feb-99

Owners Group Comments
(No Comments)

Owners Group Resolution: Approved Date: 09-Feb-99

TSTF Review Information

TSTF Received Date: 09-Feb-99 Date Distributed for Review 15-Jun-99

OG Review Completed: BWOG WOG CEOG BWROG**TSTF Comments:**

(No Comments)

TSTF Resolution: Approved Date: 15-Jun-99

6/15/99

TSTF Revision 1

Revision Status: Active

Next Action: NRC

NRC Review Information

NRC Received Date: 16-Jun-99

NRC Comments:
(No Comments)

Final Resolution: NRC Action Pending

Final Resolution Date:

Incorporation Into the NUREGs

File to BBS/LAN Date:

ISTF Informed Date:

TSTF Approved Date:

NUREG Rev Incorporated:

Affected Technical Specifications

Action 3.6.2.3.B RHR Suppression Pool Cooling

Change Description: New Action

Action 3.6.2.3.B RHR Suppression Pool Cooling

Change Description: Relabeled Action C and modified

Action 3.6.2.3.B Bases RHR Suppression Pool Cooling

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6/15/99

INSERT 1

TSTF-230,
Rev.1

B. Two RHR suppression pool cooling subsystems inoperable.	B.1 Restore one RHR suppression pool cooling subsystem to OPERABLE status.	8 hours
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INSERT 2

B.1

With two RHR suppression pool cooling subsystems inoperable, one subsystem must be restored to OPERABLE status within 8 hours. In this condition, there is a substantial loss of the primary containment pressure and temperature mitigation function. The 8 hour Completion Time is based on this loss of function and is considered acceptable due to the low probability of a DBA and the potential avoidance of a plant shutdown transient that could result in the need for the RHR suppression pool cooling subsystems to operate.

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3.6 CONTAINMENT SYSTEMS

3.6.2.3 Residual Heat Removal (RHR) Suppression Pool Cooling

LCO 3.6.2.3 Two RHR suppression pool cooling subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One RHR suppression pool cooling subsystem inoperable.	A.1 Restore RHR suppression pool cooling subsystem to OPERABLE status.	7 days
<p>^(B) ^(C) Required Action and associated Completion Time of Condition A not met.</p> <p><u>OR</u></p> <p>Two RHR suppression pool cooling subsystems inoperable.</p>	<p>^(B) ^(C) 1 Be in MODE 3.</p> <p>AND</p> <p>^(B) ^(C) 2 Be in MODE 4.</p>	<p>12 hours</p> <p>36 hours</p>

Insert 1

BASES

ACTIONS

A.1 (continued)

cooling capabilities afforded by the OPERABLE subsystem and the low probability of a DBA occurring during this period.

Insert 2 →
B.1 and B.2

^C If the Required Action and associated Completion Time of Condition A cannot be met within the required Completion Time or if two RHR suppression pool cooling subsystems are inoperable, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours and to MODE 4 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE
REQUIREMENTS

SR 3.6.2.3.1

Verifying the correct alignment for manual, power operated, and automatic valves in the RHR suppression pool cooling mode flow path provides assurance that the proper flow path exists for system operation. This SR does not apply to valves that are locked, sealed, or otherwise secured in position since these valves were verified to be in the correct position prior to locking, sealing, or securing. A valve is also allowed to be in the nonaccident position provided it can be aligned to the accident position within the time assumed in the accident analysis. This is acceptable since the RHR suppression pool cooling mode is manually initiated. This SR does not require any testing or valve manipulation; rather, it involves verification that those valves capable of being mispositioned are in the correct position. This SR does not apply to valves that cannot be inadvertently misaligned, such as check valves.

The Frequency of 31 days is justified because the valves are operated under procedural control, improper valve position would affect only a single subsystem, the probability of an event requiring initiation of the system is low, and the subsystem is a manually initiated system. This Frequency

(continued)

TSTF-230, Rev. 1

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APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One RHR suppression pool cooling subsystem inoperable.	A.1 Restore RHR suppression pool cooling subsystem to OPERABLE status.	7 days
<p>Required Action and associated Completion Time of Condition A not met.</p> <p>OR</p> <p>Two RHR suppression pool cooling subsystems inoperable.</p>	B.1 Be in MODE 3.	12 hours
	AND B.2 Be in MODE 4.	36 hours

Insert 1 →

C → B

C → B.1

C → B.2

BASES

ACTIONS

A.1 (continued)

cooling capabilities afforded by the OPERABLE subsystem and the low probability of a DBA occurring during this period.

Insert 2

B.1 and B.2

If the Required Action and required Completion Time ^(of) ~~Condition A~~ cannot be met ~~or~~ if two RHR suppression pool cooling subsystems are inoperable, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours and to MODE 4 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

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(continued)
