

Industry/TSTF Standard Technical Specification Change Traveler

LCO 3.4.12, Action I, is modified to eliminate unnecessary Required Action and Completion Time

Priority/Classification 3) Improve Specifications

NUREGs Affected: 1430 1431 1432 1433 1434

Description:

LCO 3.4.12, Action I, is modified to eliminate unnecessary Required Action and associated Completion Time.

Justification:

Required Action 1.1 is not necessary since it provides for restoration of the LTOP System to OPERABLE status. Restoration is always an option since it permits exiting the Condition. In addition, Required Actions I.1 and I.2 have different Completion Times joined by an OR. This is a faulty construction, as it allows the longer Completion Time to always be chosen. This is consistent with NUREG-1431, Westinghouse STS.

Revision History

OG Revision 0

Revision Status: Active

Next Action: NRC

Revision Proposed by: Oconee

Revision Description:
Original Issue

Owners Group Review Information

Date Originated by OG: 06-Nov-97

Owners Group Comments
ONS-024

Owners Group Resolution: Approved Date: 06-Nov-97

TSTF Review Information

TSTF Received Date: 06-Nov-97 Date Distributed for Review 15-Dec-97

OG Review Completed: BWO WOG CEOG BWOG

TSTF Comments:

Expand the justification to address the broke of two different times in the Completion Times for different Required Actions. BWO only.

TSTF Resolution: Approved Date: 05-Feb-98

Incorporation Into the NUREGs

File to BBS/LAN Date:

TSTF Informed Date:

TSTF Approved Date:

NUREG Rev Incorporated:

Affected Technical Specifications

Action 3.4.12.1 LTOP System

Action 3.4.12.1 Bases LTOP System

2/19/98

TSTF-219

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
I. Pressurizer level > [220] inches. <u>AND</u> PORV inoperable. <u>OR</u> LTOP System inoperable for any reason other than Condition A through Condition H.	I.1 Restore LTOP System to OPERABLE status. <u>OR</u> I.2 Depressurize RCS and establish RCS vent of ≥ [0.75] square inch.	1 hour 12 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.4.12.1 Verify a maximum of [one] makeup pump is capable of injecting into the RCS.	12 hours
SR 3.4.12.2 Verify HPI is deactivated.	12 hours
SR 3.4.12.3 Verify each CFT is isolated.	12 hours

(continued)

BASES

ACTIONS
(continued)

G.1, H.1, and H.2

With the PORV inoperable, overpressure relieving capability is lost, and restoration of the PORV within 1 hour is required. If that cannot be accomplished, the ability of the Makeup System to add water must be limited within the next 12 hours.

If restoration cannot be completed within 1 hour, Required Action H.1 and Required Action H.2 must be performed to limit RCS water addition capability. Makeup is not deactivated to maintain the RCS coolant level. Required Action H.1 and Required Action H.2 require reducing the makeup tank level to 70 inches and deactivating the low low makeup tank level interlock to the borated water storage tank. This makes the available makeup water volume insufficient to exceed the LTOP limit by a makeup control valve full opening.

These Completion Times also consider these activities can be accomplished in these time periods. A limiting LTOP event is not likely in those times.

Some PORV testing or maintenance can only be performed at plant shutdown. Such activity is permitted if Required Action H.1 and Required Action H.2 are taken to compensate for PORV unavailability.

I.1 and I.2

With the pressurizer level above [220] inches and the PORV inoperable or the LTOP System inoperable for any reason other than cited in Condition A through H, the system must be restored to OPERABLE status within 1 hour. When this is not possible, Required Action I.2 requires the RCS depressurized and vented within 12 hours from the time either Condition started.

One or more vents may be used. A vent size of \geq [0.75] square inches is specified. This vent size assumes 100 psig backpressure. Because makeup may be required, the vent size accommodates inadvertent full makeup system operation. Such a vent keeps the pressure from full flow of [one] makeup pump with a wide open makeup control valve within the LCO limit.

(continued)

BASES

ACTIONS

I.1 and I.2 (continued)

The PORV has a larger area and may be used for venting by opening and locking it open.

This size RCS vent or the PORVs a vent cannot maintain RCS pressure below LTOP limits if the HPI and CFT systems are inadvertently actuated. Therefore, verification of the deactivation of two HPI pumps, HPI injection, and the CFTs must accompany the depressurizing and venting. Since these systems are required deactivated by the LCO, SR 3.4.12.1, SR 3.4.12.2, and SR 3.4.12.3 require verification of their deactivated status every 12 hours.

Again, the Completion Times are based on operating experience that these activities can be accomplished in the time periods and on engineering evaluations indicating that a limiting LTOP transient is not likely in those times.

SURVEILLANCE
REQUIREMENTS

SR 3.4.12.1, SR 3.4.12.2, and SR 3.4.12.3

Verifications must be performed that only [one] makeup pump is capable of injecting into the RCS, the HPI is deactivated, and the CFT discharge isolation valves are closed and immobilized. These Surveillances ensure the minimum coolant input capability will not create an RCS overpressure condition to challenge the LTOP System. The Surveillances are required at 12 hour intervals.

The 12 hour intervals are shown by operating practice to be sufficient to regularly assess conditions for potential degradation and verify operation within the safety analysis.

SR 3.4.12.4

Verification of the pressurizer level at \leq [220] inches by observing control room or other indications ensures a cushion of sufficient size is available to reduce the rate of pressure increase from potential transients.

The 30 minute Surveillance Frequency during heatup and cooldown must be performed for the LCO Applicability period when temperature changes can cause pressurizer level

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