Industry/TSTF Standard Technical Specification Change Traveler

Relocate LTOP Arming Temperature to PTLR

Priority/Classification 5) Plant Variation

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

Description:

This change provides an option for replacing the explicit temperature below which the LTOP system must be operable with a reference to the temperature as specified in the PTLR. The temperature is determined in agreement with the NRC Branch Technical Position 5-2, and documented in the PTLR. The temperature defines the LCO 3.4.12, LTOP, Applicability in MODE 4. This temperature is a plant specific requirement based on the reactor vessel material composition and is periodically revised and adjusted as required. Referring to the PTLR for the current value is consistent with the relocation of the pressure/temperature limits TS to the PTLR. No technical change is made in the relocation.

Justification:

The specific value for the limiting RCS cold leg temperature, below which the reactor vessel may suffer damage from a cold overpressure event, is reactor vessel plant specific and varies with vessel fluence. Use of a specific value, which will require periodic amendment is not consistent with the PTLR philosophy. Reference to the PTLR for other plant specific temperature (e.g., LCO 3.4.3, with the PTLR reference is used) is acceptable, and results in simplifying the revision process when the temperature value changes with reactor fluence. Periodic updates to the vessel limiting temperature can be accommodated without going through the license amendment process. The methodology used to determine the limiting temperature is controlled by TS and requires NRC approval for changes.
Relocating this value to the PTLR is consistent with the Westinghouse PTLR methodology Topical Report, which is the only approved PTLR Topical Report.

Revision History

OG Revision 0 Revision Status: Closed

Revision Proposed by: Diablo Canyon

Revision Description:
Original Issue

Owners Group Review Information

Date Originated by OG: 10-Oct-96

Owners Group Comments
(No Comments)

Owners Group Resolution: Approved Date: 10-Oct-96

TSTF Review Information

TSTF Received Date: 11-Oct-96 Date Distributed for Review 29-Oct-96

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

TSTF Comments:

CEOG - Applicable. CEOG rejects based on NRC rejection of similar changes regarding the PTLR. This change can be pursued on a plant-specific basis.
12/3/96 Conference Call - CEOG and BWOG want justification to be rewritten to firmly support the change being PWR generic. Send revision to TSTF for review.

TSTF Resolution: Rejected Date: 19-Dec-96

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

Revision Proposed by: TSTF

Revision Description:
Made editorial corrections noted by the WOG.
Expanded the justification to describe more fully why the change is not PWR generic.

Owners Group Review Information

Date Originated by OG: 16-Dec-96

Owners Group Comments
(No Comments)

Owners Group Resolution: Approved Date: 16-Dec-96

TSTF Review Information

TSTF Received Date: 16-Dec-96 Date Distributed for Review 06-Jan-98

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

TSTF Comments:
Originally distributed on 4/8/97.
WOG only. Other vendors do not have an approved Topical to support change. Delete all references to TSTF 4 in justification and pages. Delete last sentence of justification.

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

1.1	Definition - Pressure and Temperature Limits Report (PTLR)
LCO 3.4.6	RCS Loops - Mode 4
LCO 3.4.6 Bases	RCS Loops - Mode 4
LCO 3.4.7	RCS Loops - Mode 5, Loops Filled
LCO 3.4.7 Bases	RCS Loops - Mode 5, Loops Filled
Bkgnd 3.4.10 Bases	Pressurizer Safety Valves
Appl. 3.4.10	Pressurizer Safety Valves
Appl. 3.4.10 Bases	Pressurizer Safety Valves
Action 3.4.10.B	Pressurizer Safety Valves
Action 3.4.10.B Bases	Pressurizer Safety Valves

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S/A 3.4.12 Bases	LTOP System
Appl. 3.4.12	LTOP System
Appl. 3.4.12 Bases	LTOP System
Action 3.4.12.D	LTOP System
Action 3.4.12.D Bases	LTOP System
SR 3.4.12.8	LTOP System
SR 3.4.12.8 Bases	LTOP System
Appl. 3.5.2	ECCS - Operating
Appl. 3.5.2 Bases	ECCS - Operating
5.6.6	RCS Pressure and Temperature Limits Report (PTLR)

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TSTF-233

BASES

LCO (continued)

The limit protected by this Specification is the reactor coolant pressure boundary (RCPB) SL of 110% of design pressure. Inoperability of one or more valves could result in exceeding the SL if a transient were to occur. The consequences of exceeding the ASME pressure limit could include damage to one or more RCS components, increased leakage, or additional stress analysis being required prior to resumption of reactor operation.

APPLICABILITY

In MODES 1, 2, and 3, and portions of MODE 4 above the LTOP arming temperature, OPERABILITY of [three] valves is required because the combined capacity is required to keep reactor coolant pressure below 110% of its design value during certain accidents. MODE 3 and portions of MODE 4 are conservatively included, although the listed accidents may not require the safety valves for protection.

[Insert (A)]

The LCO is not applicable in MODE 4 when all RCS cold leg temperatures are ≤ [275]°F or in MODE 5 because LTOP is provided. Overpressure protection is not required in MODE 6 with reactor vessel head detensioned.

The Note allows entry into MODES 3 and 4 with the lift settings outside the LCO limits. This permits testing and examination of the safety valves at high pressure and temperature near their normal operating range, but only after the valves have had a preliminary cold setting. The cold setting gives assurance that the valves are OPERABLE near their design condition. Only one valve at a time will be removed from service for testing. The [54] hour exception is based on 18 hour outage time for each of the [three] valves. The 18 hour period is derived from operating experience that hot testing can be performed in this timeframe.

ACTIONS

A.1

With one pressurizer safety valve inoperable, restoration must take place within 15 minutes. The Completion Time of 15 minutes reflects the importance of maintaining the RCS Overpressure Protection System. An inoperable safety valve

(continued)

INSERTS

(A) Low Temperature Overpressure Protection (LTOP) arming temperature specified in the PTLR

(B) LTOP arming temperature specified in the PTLR

(C) and the LTOP arming temperature

TSTF-233

1.1 Definitions

PHYSICS TESTS (continued)	a. Described in Chapter [14, Initial Test Program] of the FSAR; b. Authorized under the provisions of 10 CFR 50.59; or c. Otherwise approved by the Nuclear Regulatory Commission.
PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)	The PTLR is the unit specific document that provides the reactor vessel pressure and temperature limits, including heatup and cooldown rates, for the current reactor vessel fluence period. These pressure and temperature limits shall be determined for each fluence period in accordance with Specification 5.6.6. Plant operation within these operating limits is addressed in LCO 3.4.3, "RCS Pressure and Temperature (P/T) Limits," and LCO 3.4.12, "Low Temperature Overpressure Protection (LTOP) System."
QUADRANT POWER TILT RATIO (QPTR)	QPTR shall be the ratio of the maximum upper excore detector calibrated output to the average of the upper excore detector calibrated outputs, or the ratio of the maximum lower excore detector calibrated output to the average of the lower excore detector calibrated outputs, whichever is greater.
RATED THERMAL POWER (RTP)	RTP shall be a total reactor core heat transfer rate to the reactor coolant of [2893] MWt.
REACTOR TRIP SYSTEM (RTS) RESPONSE TIME	The RTS RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its RTS trip setpoint at the channel sensor until loss of stationary gripper coil voltage. The response time may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured.
SHUTDOWN MARGIN (SDM)	SDM shall be the instantaneous amount of reactivity by which the reactor is subcritical or would be subcritical from its present condition assuming:

Insert C

(continued)

TSTF-233

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.6 RCS Loops—MODE 4

LCO 3.4.6 Two loops consisting of any combination of RCS loops and residual heat removal (RHR) loops shall be OPERABLE, and one loop shall be in operation.

---NOTES---

1. All reactor coolant pumps (RCPs) and RHR pumps may be de-energized for ≤ 1 hour per 8 hour period provided:
   a. No operations are permitted that would cause reduction of the RCS boron concentration; and
   b. Core outlet temperature is maintained at least 10°F below saturation temperature.
2. No RCP shall be started with any RCS cold leg temperature ≤ [275]°F unless the secondary side water temperature of each steam generator (SG) is ≤ [50]°F above each of the RCS cold leg temperatures.

[Insert (A)]

APPLICABILITY: MODE 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One required RCS loop inoperable. AND Two RHR loops inoperable.	A.1 Initiate action to restore a second loop to OPERABLE status.	Immediately

(continued)

TSTF-233

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.7 RCS Loops—MODE 5, Loops Filled

LCO 3.4.7 One residual heat removal (RHR) loop shall be OPERABLE and in operation, and either:

a. One additional RHR loop shall be OPERABLE; or

b. The secondary side water level of at least [two] steam generators (SGs) shall be ≥ [17]%.

---NOTES---

1. The RHR pump of the loop in operation may be de-energized for ≤ 1 hour per 8 hour period provided:

   a. No operations are permitted that would cause reduction of the RCS boron concentration; and

   b. Core outlet temperature is maintained at least 10°F below saturation temperature.

2. One required RHR loop may be inoperable for up to 2 hours for surveillance testing provided that the other RHR loop is OPERABLE and in operation. [Insert (A)]

3. No reactor coolant pump shall be started with one or more RCS cold leg temperatures ≤ [275]°F unless the secondary side water temperature of each SG is ≤ [50]°F above each of the RCS cold leg temperatures.

4. All RHR loops may be removed from operation during planned heatup to MODE 4 when at least one RCS loop is in operation.

APPLICABILITY: MODE 5 with RCS loops filled.

TSTF-233

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.10 Pressurizer Safety Valves

LCO 3.4.10 [Three] pressurizer safety valves shall be OPERABLE with lift settings ≥ [2460] psig and ≤ [2510] psig.

APPLICABILITY: MODES 1, 2, and 3,
MODE 4 with all RCS cold leg temperatures > [275]°F

[Insert A]

---NOTE---
The lift settings are not required to be within the LCO limits during MODES 3 and 4 for the purpose of setting the pressurizer safety valves under ambient (hot) conditions. This exception is allowed for [54] hours following entry into MODE 3 provided a preliminary cold setting was made prior to heatup.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One pressurizer safety valve inoperable.	A.1 Restore valve to OPERABLE status.	15 minutes.
B. Required Action and associated Completion Time not met. OR Two or more pressurizer safety valves inoperable.	B.1 Be in MODE 3. AND B.2 Be in MODE 4 with any RCS cold leg temperatures ≤ [275]°F [Insert B]	6 hours 12 hours

TSTF-233

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.12 Low Temperature Overpressure Protection (LTOP) System

LCO 3.4.12 An LTOP System shall be OPERABLE with a maximum of [one] [high pressure injection (HPI)] pump [and one charging pump] capable of injecting into the RCS and the accumulators isolated and either a or b below.

a. Two RCS relief valves, as follows:

1. Two power operated relief valves (PORVs) with lift settings within the limits specified in the PTLR, or

[2. Two residual heat removal (RHR) suction relief valves with setpoints ≥ [436.5] psig and ≤ [463.5] psig, or]

[3. One PORV with a lift setting within the limits specified in the PTLR and one RHR suction relief valve with a setpoint ≥ [436.5] psig and ≤ [463.5] psig].

b. The RCS depressurized and an RCS vent of ≥ [2.07] square inches.

[Insert (8)]

APPLICABILITY: MODE 4 when all RCS cold leg temperature is ≤ [275]°F
MODE 5,
MODE 6 when the reactor vessel head is on.

---NOTE---
Accumulator isolation is only required when accumulator pressure is greater than or equal to the maximum RCS pressure for the existing RCS cold leg temperature allowed by the P/T limit curves provided in the PTLR.

TSTF-23

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action and associated Completion Time of Condition [C] not met.	D.1 Increase RCS cold leg temperature to > [275]°F [ENTER (B)] OR	12 hours
	D.2 Depressurize affected accumulator to less than the maximum RCS pressure for existing cold leg temperature allowed in the PTLR.	12 hours
E. One required RCS relief valve inoperable in MODE 4.	E.1 Restore required RCS relief valve to OPERABLE status.	7 days
F. One required RCS relief valve inoperable in MODE 5 or 6.	F.1 Restore required RCS relief valve to OPERABLE status.	24 hours

(continued)

TSTF-233

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.4.12.4	Verify RHR suction valve is open for each required RHR suction relief valve.	12 hours
SR 3.4.12.5	----------NOTE---------- Only required to be performed when complying with LCO 3.4.12.b. ---------- Verify RCS vent ≥ [2.07] square inches open.	12 hours for unlocked open vent valve(s) AND 31 days for locked open vent valve(s)
SR 3.4.12.6	Verify PORV block valve is open for each required PORV.	72 hours
SR 3.4.12.7	Verify associated RHR suction isolation valve is locked open with operator power removed for each required RHR suction relief valve.	31 days
SR 3.4.12.8	----------NOTE---------- Not required to be met until 12 hours after decreasing RCS cold leg temperature to ≤ [275]°F. ---------- INSERT (6) Perform a COT on each required PORV, excluding actuation.	31 days

(continued)

TSTF-233

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

3.5.2 ECCS—Operating

LCO 3.5.2 Two ECCS trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

NOTES

1. In MODE 3, both safety injection (SI) pump flow paths may be isolated by closing the isolation valves for up to 2 hours to perform pressure isolation valve testing per SR 3.4.14.1.
2. ~~Operation~~ In MODE 3 ~~with~~ ECCS pumps (maybe) declared inoperable ~~pursuant to~~ (to support transition into or from the Applicability of) LCO 3.4.12, "Low Temperature Overpressure Protection (LTOP) System," ~~is allowed~~ for up to 4 hours or until the temperature of all RCS cold legs exceeds [375]°F, whichever comes first.

Insert (A): ρ[us [as]°F]

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more trains inoperable. AND At least 100% of the ECCS flow equivalent to a single OPERABLE ECCS train available.	A.1 Restore train(s) to OPERABLE status.	72 hours
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3. AND B.2 Be in MODE 4.	6 hours 12 hours

LCO (continued)

loops and RHR loops. Any one loop in operation provides enough flow to remove the decay heat from the core with forced circulation. An additional loop is required to be OPERABLE to provide redundancy for heat removal.

Note 1 permits all RCPs or RHR pumps to be de-energized for ≤ 1 hour per 8 hour period. The purpose of the Note is to permit tests that are designed to validate various accident analyses values. One of the tests performed during the startup testing program is the validation of rod drop times during cold conditions, both with and without flow. The no flow test may be performed in MODE 3, 4, or 5 and requires that the pumps be stopped for a short period of time. The Note permits the de-energizing of the pumps in order to perform this test and validate the assumed analysis values. If changes are made to the RCS that would cause a change to the flow characteristics of the RCS, the input values must be revalidated by conducting the test again. The 1 hour time period is adequate to perform the test, and operating experience has shown that boron stratification is not a problem during this short period with no forced flow.

Utilization of Note 1 is permitted provided the following conditions are met along with any other conditions imposed by initial startup test procedures:

a. No operations are permitted that would dilute the RCS boron concentration, therefore maintaining the margin to criticality. Boron reduction is prohibited because a uniform concentration distribution throughout the RCS cannot be ensured when in natural circulation; and

b. Core outlet temperature is maintained at least 10°F below saturation temperature, so that no vapor bubble may form and possibly cause a natural circulation flow obstruction.

Note 2 requires that the secondary side water temperature of each SG be ≤ [50]°F above each of the RCS cold leg temperatures before the start of an RCP with any RCS cold leg temperature ≤ [275°F]. This restraint is to prevent a low temperature overpressure event due to a thermal transient when an RCP is started.

[Insert (A)]

An OPERABLE RCS loop comprises an OPERABLE RCP and an OPERABLE SG in accordance with the Steam Generator Tube

(continued)

46

TSTF-233

BASES

LCO (continued)

a. No operations are permitted that would dilute the RCS boron concentration, therefore maintaining the margin to criticality. Boron reduction is prohibited because a uniform concentration distribution throughout the RCS cannot be ensured when in natural circulation; and

b. Core outlet temperature is maintained at least 10°F below saturation temperature, so that no vapor bubble may form and possibly cause a natural circulation flow obstruction.

Note 2 allows one RHR loop to be inoperable for a period of up to 2 hours, provided that the other RHR loop is OPERABLE and in operation. This permits periodic surveillance tests to be performed on the inoperable loop during the only time when such testing is safe and possible.

Note 3 requires that the secondary side water temperature of each SG be ≤ [50]°F above each of the RCS cold leg temperatures before the start of a reactor coolant pump (RCP) with an RCS cold leg temperature ≤ [275]°F. This restriction is to prevent a low temperature overpressure event due to a thermal transient when an RCP is started.

Note 4 provides for an orderly transition from MODE 5 to MODE 4 during a planned heatup by permitting removal of RHR loops from operation when at least one RCS loop is in operation. This Note provides for the transition to MODE 4 where an RCS loop is permitted to be in operation and replaces the RCS circulation function provided by the RHR loops.

RHR pumps are OPERABLE if they are capable of being powered and are able to provide flow if required. An OPERABLE SG can perform as a heat sink when it has an adequate water level and is OPERABLE in accordance with the Steam Generator Tube Surveillance Program.

APPLICABILITY

In MODE 5 with RCS loops filled, this LCO requires forced circulation of the reactor coolant to remove decay heat from the core and to provide proper boron mixing. One loop of RHR provides sufficient circulation for these purposes. However, one additional RHR loop is required to be OPERABLE,

(continued)

TSTF-233

B 3.4 REACTOR COOLANT SYSTEM (RCS)

B 3.4.10 Pressurizer Safety Valves

BASES

BACKGROUND

The pressurizer safety valves provide, in conjunction with the Reactor Protection System, overpressure protection for the RCS. The pressurizer safety valves are totally enclosed pop type, spring loaded, self actuated valves with backpressure compensation. The safety valves are designed to prevent the system pressure from exceeding the system Safety Limit (SL), [2735] psig, which is 110% of the design pressure.

Because the safety valves are totally enclosed and self actuating, they are considered independent components. The relief capacity for each valve, [380,000] lb/hr, is based on postulated overpressure transient conditions resulting from a complete loss of steam flow to the turbine. This event results in the maximum surge rate into the pressurizer, which specifies the minimum relief capacity for the safety valves. The discharge flow from the pressurizer safety valves is directed to the pressurizer relief tank. This discharge flow is indicated by an increase in temperature downstream of the pressurizer safety valves or increase in the pressurizer relief tank temperature or level.

[Insert (A)]

Overpressure protection is required in MODES 1, 2, 3, 4, and 5; however, in MODE 4, with one or more RCS cold leg temperatures $\leq$ [275]°F, and MODE 5 and MODE 6 with the reactor vessel head on, overpressure protection is provided by operating procedures and by meeting the requirements of LCO 3.4.12, "Low Temperature Overpressure Protection (LTOP) System."

The upper and lower pressure limits are based on the ± 1% tolerance requirement (Ref. 1) for lifting pressures above 1000 psig. The lift setting is for the ambient conditions associated with MODES 1, 2, and 3. This requires either that the valves be set hot or that a correlation between hot and cold settings be established.

The pressurizer safety valves are part of the primary success path and mitigate the effects of postulated accidents. OPERABILITY of the safety valves ensures that the RCS pressure will be limited to 110% of design pressure.

(continued)

ACTIONS

A.1 (continued)

coincident with an RCS overpressure event could challenge the integrity of the pressure boundary.

B.1 and B.2

If the Required Action of A.1 cannot be met within the required Completion Time or if two or more pressurizer safety valves are inoperable, the plant must be brought to a MODE in which the requirement does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 4 with any RCS cold leg temperatures ≤ [275]°F within 12 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. With any RCS cold leg temperatures at or below [275]°F, overpressure protection is provided by the LTOP System. The change from MODE 1, 2, or 3 to MODE 4 reduces the RCS energy (core power and pressure), lowers the potential for large pressurizer insurges, and thereby removes the need for overpressure protection by [three] pressurizer safety valves.

[Insert (A)]

SURVEILLANCE REQUIREMENTS

SR 3.4.10.1

SRs are specified in the Inservice Testing Program. Pressurizer safety valves are to be tested in accordance with the requirements of Section XI of the ASME Code (Ref. 4), which provides the activities and Frequencies necessary to satisfy the SRs. No additional requirements are specified.

The pressurizer safety valve setpoint is ± [3]% for OPERABILITY; however, the valves are reset to ± 1% during the Surveillance to allow for drift.

REFERENCES

1. ASME, Boiler and Pressure Vessel Code, Section III.
2. FSAR, Chapter [15].

(continued)

BASES

BACKGROUND

RCS Vent Requirements (continued)

position, or similarly establishing a vent by opening an RCS vent valve. The vent path(s) must be above the level of reactor coolant, so as not to drain the RCS when open.

APPLICABLE SAFETY ANALYSES

Safety analyses (Ref. 4) demonstrate that the reactor vessel is adequately protected against exceeding the Reference 1 P/T limits. In MODES 1, 2, and 3, and in MODE 4 with RCS cold leg temperature exceeding [275] °F, the pressurizer safety valves will prevent RCS pressure from exceeding the Reference 1 limits. At about [275] °F and below, overpressure prevention falls to two OPERABLE RCS relief valves or to a depressurized RCS and a sufficient sized RCS vent. Each of these means has a limited overpressure relief capability.

[Insert (B)]

The actual temperature at which the pressure in the P/T limit curve falls below the pressurizer safety valve setpoint increases as the reactor vessel material toughness decreases due to neutron embrittlement. Each time the PTLR curves are revised, the LTOP System must be re-evaluated to ensure its functional requirements can still be met using the RCS relief valve method or the depressurized and vented RCS condition.

The PTLR contains the acceptance limits that define the LTOP requirements. Any change to the RCS must be evaluated against the Reference 4 analyses to determine the impact of the change on the LTOP acceptance limits.

Transients that are capable of overpressurizing the RCS are categorized as either mass or heat input transients, examples of which follow:

Mass Input Type Transients

a. Inadvertent safety injection; or

b. Charging/letdown flow mismatch.

(continued)

APPLICABLE SAFETY ANALYSES

Heat Input Type Transients (continued)

Fracture mechanics analyses established the temperature of LTOP Applicability at [275]°F [INSERT (B)]

The consequences of a small break loss of coolant accident (LOCA) in LTOP MODE 4 conform to 10 CFR 50.46 and 10 CFR 50, Appendix K (Refs. 5 and 6), requirements by having a maximum of [one] [HPI] pump [and one charging pump] OPERABLE and SI actuation enabled.

PORV Performance

The fracture mechanics analyses show that the vessel is protected when the PORVs are set to open at or below the limit shown in the PTLR. The setpoints are derived by analyses that model the performance of the LTOP System, assuming the limiting LTOP transient of [one] [HPI] pump [and one charging pump] injecting into the RCS. These analyses consider pressure overshoot and undershoot beyond the PORV opening and closing, resulting from signal processing and valve stroke times. The PORV setpoints at or below the derived limit ensures the Reference 1 P/T limits will be met.

The PORV setpoints in the PTLR will be updated when the revised P/T limits conflict with the LTOP analysis limits. The P/T limits are periodically modified as the reactor vessel material toughness decreases due to neutron embrittlement caused by neutron irradiation. Revised limits are determined using neutron fluence projections and the results of examinations of the reactor vessel material irradiation surveillance specimens. The Bases for LCO 3.4.3, "RCS Pressure and Temperature (P/T) Limits," discuss these examinations.

The PORVs are considered active components. Thus, the failure of one PORV is assumed to represent the worst case, single active failure.

(continued)

TSTF-233

BASES

LCO (continued)

3. One OPERABLE PORV and one OPERABLE RHR suction relief valve; or

b. A depressurized RCS and an RCS vent.

An RCS vent is OPERABLE when open with an area of ≥ [2.07] square inches.

Each of these methods of overpressure prevention is capable of mitigating the limiting LTOP transient.

APPLICABILITY

This LCO is applicable in MODE 4 when any RCS cold leg temperature is ≤ [275]°F, in MODE 5, and in MODE 6 when the reactor vessel head is on. The pressurizer safety valves provide overpressure protection that meets the Reference 1 P/T limits above [275]°F. When the reactor vessel head is off, overpressurization cannot occur.

[Insert (B)]

LCO 3.4.3 provides the operational P/T limits for all MODES. LCO 3.4.10, "Pressurizer Safety Valves," requires the OPERABILITY of the pressurizer safety valves that provide overpressure protection during MODES 1, 2, and 3, and MODE 4 above [275]°F.

Low temperature overpressure prevention is most critical during shutdown when the RCS is water solid, and a mass or heat input transient can cause a very rapid increase in RCS pressure when little or no time allows operator action to mitigate the event.

The Applicability is modified by a Note stating that accumulator isolation is only required when the accumulator pressure is more than or at the maximum RCS pressure for the existing temperature, as allowed by the P/T limit curves. This Note permits the accumulator discharge isolation valve Surveillance to be performed only under these pressure and temperature conditions.

(continued)

TSTF-223-A

BASES (continued)

ACTIONS

A.1 [and B.1]

With two or more HPI pumps capable of injecting into the RCS, RCS overpressurization is possible.

To immediately initiate action to restore restricted coolant input capability to the RCS reflects the urgency of removing the RCS from this condition.

Required Action B.1 is modified by a Note that permits two charging pumps capable of RCS injection for ≤ 15 minutes to allow for pump swaps.

C.1, D.1, and D.2

An unisolated accumulator requires isolation within 1 hour. This is only required when the accumulator pressure is at or more than the maximum RCS pressure for the existing temperature allowed by the P/T limit curves.

If isolation is needed and cannot be accomplished in 1 hour, Required Action D.1 and Required Action D.2 provide two options, either of which must be performed in the next 12 hours. By increasing the RCS temperature to > [275]°F, an accumulator pressure of [600] psig cannot exceed the LTOP limits if the accumulators are fully injected. Depressurizing the accumulators below the LTOP limit from the PTLR also gives this protection.

The Completion Times are based on operating experience that these activities can be accomplished in these time periods and on engineering evaluations indicating that an event requiring LTOP is not likely in the allowed times.

E.1

In MODE 4 when any RCS cold leg temperature is ≤ [275]°F with one required RCS relief valve inoperable, the RCS relief valve must be restored to OPERABLE status within a Completion Time of 7 days. Two RCS relief valves [in any combination of the PORVS and the RHR suction relief valves] are required to provide low temperature overpressure mitigation while withstanding a single failure of an active component.

(continued)

SURVEILLANCE REQUIREMENTS

SR 3.4.12.6 (continued)

The 72 hour Frequency is considered adequate in view of other administrative controls available to the operator in the control room, such as valve position indication, that verify that the PORV block valve remains open.

SR 3.4.12.7

Each required RHR suction relief valve shall be demonstrated OPERABLE by verifying its RHR suction valve and RHR suction isolation valve are open and by testing it in accordance with the Inservice Testing Program. (Refer to SR 3.4.12.4 for the RHR suction valve Surveillance and for a description of the requirements of the Inservice Testing Program.) This Surveillance is only performed if the RHR suction relief valve is being used to satisfy this LCO.

Every 31 days the RHR suction isolation valve is verified locked open, with power to the valve operator removed, to ensure that accidental closure will not occur. The "locked open" valve must be locally verified in its open position with the manual actuator locked in its inactive position. The 31 day Frequency is based on engineering judgment, is consistent with the procedural controls governing valve operation, and ensures correct valve position.

SR 3.4.12.8

Performance of a COT is required within 12 hours after decreasing RCS temperature to ≤ [275]°F and every 31 days on each required PORV to verify and, as necessary, adjust its lift setpoint. The COT will verify the setpoint is within the PTLR allowed maximum limits in the PTLR. PORV actuation could depressurize the RCS and is not required.

The 12 hour Frequency considers the unlikelihood of a low temperature overpressure event during this time.

[Insert (B)]

A Note has been added indicating that this SR is required to be met 12 hours after decreasing RCS cold leg temperature to ≤ [275]°F. The COT cannot be performed until in the LTOP MODES when the PORV lift setpoint can be reduced to the LTOP

(continued)

TSTF-233

BASES (continued)

APPLICABILITY

In MODES 1, 2, and 3, the ECCS OPERABILITY requirements for the limiting Design Basis Accident, a large break LOCA, are based on full power operation. Although reduced power would not require the same level of performance, the accident analysis does not provide for reduced cooling requirements in the lower MODES. The centrifugal charging pump performance is based on a small break LOCA, which establishes the pump performance curve and has less dependence on power. The SI pump performance requirements are based on a small break LOCA. MODE 2 and MODE 3 requirements are bounded by the MODE 1 analysis.

This LCO is only applicable in MODE 3 and above. Below MODE 3, the SI signal setpoint is manually bypassed by operator control, and system functional requirements are relaxed as described in LCO 3.5.3, "ECCS—Shutdown."

As indicated in Note 1, the flow path may be isolated for 2 hours in MODE 3, under controlled conditions, to perform pressure isolation valve testing per SR 3.4.14.1. The flow path is readily restorable from the control room.

As indicated in Note 2, operation in MODE 3 with ECCS trains declared inoperable ~~pursuant to~~ LCO 3.4.12, "Low Temperature Overpressure Protection (LTOP) System," is necessary for plants with an LTOP arming temperature at or near the MODE 3 boundary temperature of 350°F. LCO 3.4.12 requires that certain pumps be rendered inoperable at and below the LTOP arming temperature. When this temperature is at or near the MODE 3 boundary temperature, time is needed to restore the inoperable pumps to OPERABLE status on exiting the LTOP Applicability

in order to facilitate entry into or exit from the Applicability of

make pumps incapable of injecting prior to entering the LTOP Applicability, and provide time to

In MODES 5 and 6, plant conditions are such that the probability of an event requiring ECCS injection is extremely low. Core cooling requirements in MODE 5 are addressed by LCO 3.4.7, "RCS Loops—MODE 5, Loops Filled," and LCO 3.4.8, "RCS Loops—MODE 5, Loops Not Filled." MODE 6 core cooling requirements are addressed by LCO 3.9.5, "Residual Heat Removal (RHR) and Coolant Circulation—High Water Level," and LCO 3.9.6, "Residual Heat Removal (RHR) and Coolant Circulation—Low Water Level."

(continued)

5.6 Reporting Requirements

TSTF-233

5.6.6 Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR) (continued)

, LTOP arming, and PORV lift settings

testing as well as heatup and cooldown rates shall be established and documented in the PTLR for the following: [The individual specifications that address RCS pressure and temperature limits must be referenced here.]

b. The analytical methods used to determine the RCS pressure and temperature limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents: [Identify the NRC staff approval document by date.]

c. The PTLR shall be provided to the NRC upon issuance for each reactor vessel fluence period and for any revision or supplement thereto.

Reviewers' Notes: The methodology for the calculation of the P-T limits for NRC approval should include the following provisions:

1. The methodology shall describe how the neutron fluence is calculated (reference new Regulatory Guide when issued).

2. The Reactor Vessel Material Surveillance Program shall comply with Appendix H to 10 CFR 50. The reactor vessel material irradiation surveillance specimen removal schedule shall be provided, along with how the specimen examinations shall be used to update the PTLR curves.

3. Low Temperature Overpressure Protection (LTOP) System lift setting limits for the Power Operated Relief Valves (PORVs), developed using NRC-approved methodologies may be included in the PTLR.

4. The adjusted reference temperature (ART) for each reactor beltline material shall be calculated, accounting for radiation embrittlement, in accordance with Regulatory Guide 1.99, Revision 2.

5. The limiting ART shall be incorporated into the calculation of the pressure and temperature limit curves in accordance with NUREG-0800 Standard Review Plan 5.3.2, Pressure-Temperature Limits.

6. LTOP arming temperature limit development methodology.

(continued)