Industry/TSTF Standard Technical Specification Change Traveler

Clarify requirement for EDG start signal on RPV Level - Low, Low, Low during RPV cavity flood-up

Priority/Classification 1) Correct Specifications

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

Description:

The proposed change to LCO 3.3.5.1 would clarify which, if any, ECCS instrumentation is required to be OPERABLE in Mode 5, with RPV level >= [23] feet above the RPV flange to support EDG OPERABILITY. Footnote (a) to Table 3.3.5.1-1 has been modified to only require these functions to be OPERABLE when the associated ECCS is required to be operable per LCO 3.5.2.

Justification:

The proposed change provides consistency between the LCO 3.5.2 and LCO 3.8.2 (and other LCOs) requirements for OPERABILITY of ECCS instrumentation. Consistent with the operability requirements in LCO 3.5.2, ECCS - Shutdown, ECCS is not required to be operable when the plant is at high water level. If the ECCS is not required then the instrument whose function it is to initiate ECCS should not be required. However, the current footnote implies that the ECCS instrumentation is required to be operable not only when the associated ECCS is required to be operable but also when the associated ECCS support systems are required to be operable. This is incorrect since these support systems also support other functions that are required at times when the ECCS system and associated initiation instrumentation is not needed (e.g., the DGs are required during fuel handling.)

Revision History

OG Revision 0 Revision Status: Closed

Revision Proposed by: Duane Arnold

Revision Description:
Original Issue

Owners Group Review Information

Date Originated by OG: 25-Feb-97

Owners Group Comments
(No Comments)

Owners Group Resolution: Approved Date: 25-Feb-97

TSTF Review Information

TSTF Received Date: 27-Apr-97 Date Distributed for Review 16-May-97

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

TSTF Comments:
NA - PWRs

TSTF Resolution: Superceeded Date: 04-Aug-97

OG Revision 1 Revision Status: Active Next Action: NRC

Revision Proposed by: BWROG

Revision Description:
Misc. editiorial changes, added additional affected pages.

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:

The AC Sources Shutdown LCO still has LOCA Start SRs in Cold Shutdown/Refueling that need to be addressed - not required to be met; TSTF approves BWR 34R1 as BWR 4 and 6 only but recognizes that the issue of AC sources should be addressed separately.

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

S/A 3.3.5.1 Bases	ECCS Instrumentation
LCO 3.3.5.1	ECCS Instrumentation
	Change Description: Table 3.3.5.1-1, Footnote (a)
LCO 3.8.2 Bases	AC Sources - Shutdown

Insert 1

Table 3.3.5.1-1 is modified by two footnotes. Footnote (a) is added to clarify that the associated functions are required to be OPERABLE in MODES 4 and 5 only when their supported ECCS are required to be OPERABLE per LCO 3.5.2, ECCS - Shutdown.

Insert 2

Per Footnote (a) to Table 3.3.5.1-1, this ECCS Function is only required to be OPERABLE in MODES 4 and 5 whenever the associated ECCS is required to be OPERABLE per LCO 3.5.2.

Insert 3

Automatic initiation of the required DG during shutdown conditions is specified in LCO 3.3.5.1, ECCS Instrumentation, and LCO 3.3.8.1, LOP Instrumentation.

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Table 3.3.5.1-1 (page 1 of 6)
Emergency Core Cooling System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Core Spray System					
a. Reactor Vessel Water Level – Low Low Low, Level 1	1,2,3, 4(a), 5(a)	[4](b)	B	SR 3.3.5.1.1 SR 3.3.5.1.2 [SR 3.3.5.1.3] SR 3.3.5.1.5 SR 3.3.5.1.6 SR 3.3.5.1.7	≥ [-113] inches
b. Drywell Pressure – High	1,2,3	[4](b)	B	SR 3.3.5.1.1 SR 3.3.5.1.2 [SR 3.3.5.1.3] SR 3.3.5.1.5 SR 3.3.5.1.6 SR 3.3.5.1.7	≤ [1.92] psig
c. Reactor Steam Dome Pressure – Low (Injection Permissive)	1,2,3	[4]	C	SR 3.3.5.1.1 SR 3.3.5.1.2 [SR 3.3.5.1.3] SR 3.3.5.1.5 SR 3.3.5.1.6 SR 3.3.5.1.7	≥ [390] psig and ≤ [500] psig
	4(a), 5(a)	[4]	B	SR 3.3.5.1.1 SR 3.3.5.1.2 [SR 3.3.5.1.3] SR 3.3.5.1.5 SR 3.3.5.1.6 SR 3.3.5.1.7	≥ [390] psig and ≤ [500] psig
[d. Core Spray Pump Discharge Flow – Low (Bypass)	1,2,3, 4(a), 5(a)	[2] [1 per pump]	E	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.5 SR 3.3.5.1.6	≥ [ ] gpm and ≤ [ ] gpm]
[e. Manual Initiation	1,2,3, 4(a), 5(a)	[2] [1 per subsystem]	C	SR 3.3.5.1.6	NA]
2. Low Pressure Coolant Injection (LPCI) System					
a. Reactor Vessel Water Level – Low Low Low, Level 1	1,2,3, 4(a), 5(a)	[4](b)	B	SR 3.3.5.1.1 SR 3.3.5.1.2 [SR 3.3.5.1.3] SR 3.3.5.1.5 SR 3.3.5.1.6 SR 3.3.5.1.7	≥ [-113] inches

(continued)

(a) When associated ECCS subsystem(s) are required to be OPERABLE per LCO 3.5.2, ECCS-Shutdown

(b) Also required to initiate the associated [diesel generator (DG) and isolate the associated plant service water (PSW) turbine building (T/B) isolation valves].

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Table 3.3.5.1-1 (page 2 of 6)
Emergency Core Cooling System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
2. LPCI System (continued)					
b. Drywell Pressure – High	1,2,3	[4][b]	B	SR 3.3.5.1.1 SR 3.3.5.1.2 [SR 3.3.5.1.3] SR 3.3.5.1.5 SR 3.3.5.1.6 SR 3.3.5.1.7	≤ [1.92] psig
c. Reactor Steam Dome Pressure – Low (Injection Permissive)	1,2,3	[4]	C	SR 3.3.5.1.1 SR 3.3.5.1.2 [SR 3.3.5.1.3] SR 3.3.5.1.5 SR 3.3.5.1.6 SR 3.3.5.1.7	≥ [390] psig and ≤ [500] psig
	4[a], 5[a]	[4]	B	SR 3.3.5.1.1 SR 3.3.5.1.2 [SR 3.3.5.1.3] SR 3.3.5.1.5 SR 3.3.5.1.6 SR 3.3.5.1.7	≥ [390] psig and ≤ [500] psig
d. Reactor Steam Dome Pressure – Low (Recirculation Discharge Valve Permissive)	1[c],2[c], 3[c]	[4]	C	SR 3.3.5.1.1 SR 3.3.5.1.2 [SR 3.3.5.1.3] SR 3.3.5.1.5 SR 3.3.5.1.6	≥ [335] psig
e. Reactor Vessel Shroud Level – Level 0	1,2,3	[2]	B	SR 3.3.5.1.1 SR 3.3.5.1.2 [SR 3.3.5.1.3] SR 3.3.5.1.5 SR 3.3.5.1.6	≥ [-202] inches
f. Low Pressure Coolant Injection Pump Start – Time Delay Relay	1,2,3, 4[a], 5[a]	[4] [1 per pump]	C	SR 3.3.5.1.5 SR 3.3.5.1.6	
Pumps A,B,D					≥ 9 seconds and ≤ 11 seconds
Pump C					≤ 1 second

(continued)

(a) When associated (ECCS) subsystem(s) are required to be OPERABLE per LCO 3.5.2, ECCS - Shutdown.

(b) Also required to initiate the associated [DG and isolate the associated PSW T/B isolation valves].

(c) With associated recirculation pump discharge valve open.

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Table 3.3.5.1-1 (page 3 of 6)
Emergency Core Cooling System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
2. LPCI System (continued)					
[g. Low Pressure Coolant Injection Pump Discharge Flow – Low (Bypass)	1,2,3, 4(a), 5(a)	[4] [1 per pump]	E	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.5 SR 3.3.5.1.6	≥ [ ] gpm and ≤ [ ] gpm]
[h. Manual Initiation	1,2,3, 4(a), 5(a)	[2] [1 per subsystem]	C	SR 3.3.5.1.6	NA]
3. High Pressure Coolant Injection (HPCI) System					
a. Reactor Vessel Water Level – Low Low, Level 2	1, 2(d), 3(d)	[4]	B	SR 3.3.5.1.1 SR 3.3.5.1.2 [SR 3.3.5.1.3] SR 3.3.5.1.5 SR 3.3.5.1.6 SR 3.3.5.1.7	≥ [-47] inches
b. Drywell Pressure – High	1, 2(d), 3(d)	[4]	B	SR 3.3.5.1.1 SR 3.3.5.1.2 [SR 3.3.5.1.3] SR 3.3.5.1.5 SR 3.3.5.1.6 SR 3.3.5.1.7	≤ [1.92] psig
c. Reactor Vessel Water Level – High, Level 8	1, 2(d), 3(d)	[2]	C	SR 3.3.5.1.1 SR 3.3.5.1.2 [SR 3.3.5.1.3] SR 3.3.5.1.5 SR 3.3.5.1.6 SR 3.3.5.1.7	≤ [56.5] inches
d. Condensate Storage Tank Level – Low	1, 2(d), 3(d)	[2]	D	[SR 3.3.5.1.1] SR 3.3.5.1.2 [SR 3.3.5.1.4] SR 3.3.5.1.6	≥ [0] inches
e. Suppression Pool Water Level – High	1, 2(d), 3(d)	[2]	D	SR 3.3.5.1.1 SR 3.3.5.1.2 [SR 3.3.5.1.3] SR 3.3.5.1.5 SR 3.3.5.1.6	≤ [154] inches

(continued)

(a) When the associated (ECCS) subsystem(s) are required to be OPERABLE (per LCO 3.5.2, ECCS-Shutdown.)

(d) With reactor steam dome pressure > [150] psig.

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BACKGROUND

Diesel Generators (continued)

breaker open). The DGs will only energize their respective Engineered Safety Feature buses if a loss of offsite power occurs. (Refer to Bases for LCO 3.3.8.1.)

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

The actions of the ECCS are explicitly assumed in the safety analyses of References 1, 2, and 3. The ECCS is initiated to preserve the integrity of the fuel cladding by limiting the post LOCA peak cladding temperature to less than the 10 CFR 50.46 limits.

ECCS instrumentation satisfies Criterion 3 of the NRC Policy Statement. Certain instrumentation Functions are retained for other reasons and are described below in the individual Functions discussion.

The OPERABILITY of the ECCS instrumentation is dependent upon the OPERABILITY of the individual instrumentation channel Functions specified in Table 3.3.5.1-1. Each Function must have a required number of OPERABLE channels, with their setpoints within the specified Allowable Values, where appropriate. The actual setpoint is calibrated consistent with applicable setpoint methodology assumptions. Each ECCS subsystem must also respond within its assumed response time. (Insert 1) Table 3.3.5.1-1, footnote (b) is added to show that certain ECCS instrumentation Functions are also required to be OPERABLE to perform DG initiation and actuation of other Technical Specifications (TS) equipment.

Allowable Values are specified for each ECCS Function specified in the table. Nominal trip setpoints are specified in the setpoint calculations. The nominal setpoints are selected to ensure that the setpoints do not exceed the Allowable Value between CHANNEL CALIBRATIONS. Operation with a trip setpoint less conservative than the nominal trip setpoint, but within its Allowable Value, is acceptable. A channel is inoperable if its actual trip setpoint is not within its required Allowable Value. Trip setpoints are those predetermined values of output at which an action should take place. The setpoints are compared to the actual process parameter (e.g., reactor vessel water level), and when the measured output value of the process parameter exceeds the setpoint, the associated device (e.g.,

(continued)

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

1.a, 2.a. Reactor Vessel Water Level—Low Low Low, Level 1 (continued)

Reactor Vessel Water Level—Low Low Low, Level 1 signals are initiated from four level transmitters that sense the difference between the pressure due to a constant column of water (reference leg) and the pressure due to the actual water level (variable leg) in the vessel.

The Reactor Vessel Water Level—Low Low Low, Level 1 Allowable Value is chosen to allow time for the low pressure core flooding systems to activate and provide adequate cooling.

Four channels of Reactor Vessel Water Level—Low Low Low, Level 1 Function are only required to be OPERABLE when the ECCS (or DG(s)) are required to be OPERABLE to ensure that no single instrument failure can preclude ECCS (and DG) initiation. Refer to LCO 3.5.1 and LCO 3.5.2, "ECCS—Shutdown," for Applicability Bases for the low pressure ECCS subsystems; LCO 3.8.1, "AC Sources—Operating"; and LCO 3.8.2, "AC Sources—Shutdown," for Applicability Bases for the DGs.

(Insert 2)

1.b, 2.b. Drywell Pressure—High

High pressure in the drywell could indicate a break in the reactor coolant pressure boundary (RCPB). The low pressure ECCS and associated DGs are initiated upon receipt of the Drywell Pressure—High Function in order to minimize the possibility of fuel damage. The Drywell Pressure—High Function, along with the Reactor Water Level—Low Low Low, Level 1 Function, is directly assumed in the analysis of the recirculation line break (Ref. 4). The core cooling function of the ECCS, along with the scram action of the RPS, ensures that the fuel peak cladding temperature remains below the limits of 10 CFR 50.46.

High drywell pressure signals are initiated from four pressure transmitters that sense drywell pressure. The Allowable Value was selected to be as low as possible and be indicative of a LOCA inside primary containment.

The Drywell Pressure—High Function is required to be OPERABLE when the ECCS or DG is required to be OPERABLE in conjunction with times when the primary containment is

(continued)

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

1.b, 2.b. Drywell Pressure—High (continued)

required to be OPERABLE. Thus, four channels of the CS and LPCI Drywell Pressure—High Function are required to be OPERABLE in MODES 1, 2, and 3 to ensure that no single instrument failure can preclude ECCS and DG initiation. In MODES 4 and 5, the Drywell Pressure—High Function is not required, since there is insufficient energy in the reactor to pressurize the primary containment to Drywell Pressure—High setpoint. Refer to LCO 3.5.1 for Applicability Bases for the low pressure ECCS subsystems and to LCO 3.8.1 for Applicability Bases for the DGs.

1.c, 2.c. Reactor Steam Dome Pressure—Low (Injection Permissive)

Low reactor steam dome pressure signals are used as permissives for the low pressure ECCS subsystems. This ensures that, prior to opening the injection valves of the low pressure ECCS subsystems, the reactor pressure has fallen to a value below these subsystems' maximum design pressure. The Reactor Steam Dome Pressure—Low is one of the Functions assumed to be OPERABLE and capable of permitting initiation of the ECCS during the transients analyzed in References 1 and 3. In addition, the Reactor Steam Dome Pressure—Low Function is directly assumed in the analysis of the recirculation line break (Ref. 2). The core cooling function of the ECCS, along with the scram action of the RPS, ensures that the fuel peak cladding temperature remains below the limits of 10 CFR 50.46.

The Reactor Steam Dome Pressure—Low signals are initiated from four pressure transmitters that sense the reactor dome pressure.

The Allowable Value is low enough to prevent overpressuring the equipment in the low pressure ECCS, but high enough to ensure that the ECCS injection prevents the fuel peak cladding temperature from exceeding the limits of 10 CFR 50.46.

Four channels of Reactor Steam Dome Pressure—Low Function are only required to be OPERABLE when the ECCS is required to be OPERABLE to ensure that no single instrument failure can preclude ECCS initiation. Refer to LCO 3.5.1 and

<INSERT 2>

(continued)

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

1.c, 2.c. Reactor Steam Dome Pressure—Low (Injection Permissive) (continued)

LCO 3.5.2 for Applicability Bases for the low pressure ECCS subsystems.

1.d, 2.g. Core Spray and Low Pressure Coolant Injection Pump Discharge Flow—Low (Bypass)

The minimum flow instruments are provided to protect the associated low pressure ECCS pump from overheating when the pump is operating and the associated injection valve is not fully open. The minimum flow line valve is opened when low flow is sensed, and the valve is automatically closed when the flow rate is adequate to protect the pump. The LPCI and CS Pump Discharge Flow—Low Functions are assumed to be OPERABLE and capable of closing the minimum flow valves to ensure that the low pressure ECCS flows assumed during the transients and accidents analyzed in References 1, 2, and 3 are met. The core cooling function of the ECCS, along with the scram action of the RPS, ensures that the fuel peak cladding temperature remains below the limits of 10 CFR 50.46.

One flow transmitter per ECCS pump is used to detect the associated subsystems' flow rates. The logic is arranged such that each transmitter causes its associated minimum flow valve to open. The logic will close the minimum flow valve once the closure setpoint is exceeded. The LPCI minimum flow valves are time delayed such that the valves will not open for 10 seconds after the switches detect low flow. The time delay is provided to limit reactor vessel inventory loss during the startup of the RHR shutdown cooling mode. The Pump Discharge Flow—Low Allowable Values are high enough to ensure that the pump flow rate is sufficient to protect the pump, yet low enough to ensure that the closure of the minimum flow valve is initiated to allow full flow into the core.

Each channel of Pump Discharge Flow—Low Function (two CS channels and four LPCI channels) is only required to be OPERABLE when the associated ECCS is required to be OPERABLE to ensure that no single instrument failure can preclude the ECCS function. Refer to LCO 3.5.1 and LCO 3.5.2 for Applicability Bases for the low pressure ECCS subsystems.

<INSERT 2>

(continued)

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BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

1.e, 2.h. Manual Initiation

The Manual Initiation push button channels introduce signals into the appropriate ECCS logic to provide manual initiation capability and are redundant to the automatic protective instrumentation. There is one push button for each of the CS and LPCI subsystems (i.e., two for CS and two for LPCI).

The Manual Initiation Function is not assumed in any accident or transient analyses in the FSAR. However, the Function is retained for overall redundancy and diversity of the low pressure ECCS function as required by the NRC in the plant licensing basis.

There is no Allowable Value for this Function since the channels are mechanically actuated based solely on the position of the push buttons. Each channel of the Manual Initiation Function (one channel per subsystem) is only required to be OPERABLE when the associated ECCS is required to be OPERABLE. Refer to LCO 3.5.1 and LCO 3.5.2 for Applicability Bases for the low pressure ECCS subsystems.

<Insert 2>

2.d. Reactor Steam Dome Pressure—Low (Recirculation Discharge Valve Permissive)

Low reactor steam dome pressure signals are used as permissives for recirculation discharge valve closure. This ensures that the LPCI subsystems inject into the proper RPV location assumed in the safety analysis. The Reactor Steam Dome Pressure—Low is one of the Functions assumed to be OPERABLE and capable of closing the valve during the transients analyzed in References 1 and 3. The core cooling function of the ECCS, along with the scram action of the RPS, ensures that the fuel peak cladding temperature remains below the limits of 10 CFR 50.46. The Reactor Steam Dome Pressure—Low Function is directly assumed in the analysis of the recirculation line break (Ref. 2).

The Reactor Steam Dome Pressure—Low signals are initiated from four pressure transmitters that sense the reactor dome pressure.

The Allowable Value is chosen to ensure that the valves close prior to commencement of LPCI injection flow into the core, as assumed in the safety analysis.

(continued)

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BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

2.e. Reactor Vessel Shroud Level—Level 0 (continued)

opened for are not required to be OPERABLE in MODES 4 and 5 and are normally not used).

2.f. Low Pressure Coolant Injection Pump Start—Time Delay Relay

The purpose of this time delay is to stagger the start of the LPCI pumps that are in each of Divisions 1 and 2, thus limiting the starting transients on the 4.16 kV emergency buses. This Function is only necessary when power is being supplied from the standby power sources (DG). However, since the time delay does not degrade ECCS operation, it remains in the pump start logic at all times. The LPCI Pump Start—Time Delay Relays are assumed to be OPERABLE in the accident and transient analyses requiring ECCS initiation. That is, the analyses assume that the pumps will initiate when required and excess loading will not cause failure of the power sources.

There are four LPCI Pump Start—Time Delay Relays, one in each of the RHR pump start logic circuits. While each time delay relay is dedicated to a single pump start logic, a single failure of a LPCI Pump Start—Time Delay Relay could result in the failure of the two low pressure ECCS pumps, powered for the same ESF bus, to perform their intended function within the assumed ECCS RESPONSE TIME (e.g., as in the case where both ECCS pumps on one ESF bus start simultaneously due to an inoperable time delay relay). This still leaves four of the six low pressure ECCS pumps OPERABLE; thus, the single failure criterion is met (i.e., loss of one instrument does not preclude ECCS initiation). The Allowable Value for the LPCI Pump Start—Time Delay Relays is chosen to be long enough so that most of the starting transient of the first pump is complete before starting the second pump on the same 4.16 kV emergency bus and short enough so that ECCS operation is not degraded.

Each LPCI Pump Start—Time Delay Relay Function is required to be OPERABLE only when the associated LPCI subsystem is required to be OPERABLE. Refer to LCO 3.5.1 and LCO 3.5.2 for Applicability Bases for the LPCI subsystems.

<INSERT 2>

(continued)

BASES

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LCO (continued)

power source is available for providing electrical power support assuming a loss of the offsite circuit. Together, OPERABILITY of the required offsite circuit and DG ensures the availability of sufficient AC sources to operate the plant in a safe manner and to mitigate the consequences of postulated events during shutdown (e.g., fuel handling accidents and reactor vessel draindown).

(Insert 3)

The qualified offsite circuit(s) must be capable of maintaining rated frequency and voltage while connected to their respective ESF bus(es), and of accepting required loads during an accident. Qualified offsite circuits are those that are described in the FSAR and are part of the licensing basis for the unit. [The offsite circuit consists of incoming breaker and disconnect to the 2C or 2D startup auxiliary transformer (SAT), associated 2C or 2D SAT, and the respective circuit path including feeder breakers to all 4.16 kV ESF buses required by LCO 3.8.10.]

The required DG must be capable of starting, accelerating to rated speed and voltage, connecting to its respective ESF bus on detection of bus undervoltage, and accepting required loads. This sequence must be accomplished within [12] seconds. Each DG must also be capable of accepting required loads within the assumed loading sequence intervals, and must continue to operate until offsite power can be restored to the ESF buses. These capabilities are required to be met from a variety of initial conditions such as DG in standby with engine hot and DG in standby with engine at ambient conditions. Additional DG capabilities must be demonstrated to meet required Surveillances, e.g., capability of the DG to revert to standby status on an ECCS signal while operating in parallel test mode.

Proper sequencing of loads, including tripping of nonessential loads, is a required function for DG OPERABILITY. [In addition, proper sequence operation is an integral part of offsite circuit OPERABILITY since its inoperability impacts the ability to start and maintain energized loads required OPERABLE by LCO 3.8.10.]

It is acceptable for divisions to be cross tied during shutdown conditions, permitting a single offsite power circuit to supply all required divisions. No fast transfer capability is required for offsite circuits to be considered OPERABLE.

(continued)

Table 3.3.5.1-1 (page 1 of 5)
Emergency Core Cooling System Instrumentation

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FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Low Pressure Coolant Injection-A (LPCI) and Low Pressure Core Spray (LPCS) Subsystems					
a. Reactor Vessel Water Level – Low Low Low, Level 1	1,2,3, $_4$(a),$_5$(a)	[2](b)	B	SR 3.3.5.1.1 SR 3.3.5.1.2 [SR 3.3.5.1.3] SR 3.3.5.1.5 SR 3.3.5.1.6 [SR 3.3.5.1.7]	≥ [-152.5] inches
b. Drywell Pressure – High	1,2,3	[2](b)	B	SR 3.3.5.1.1 SR 3.3.5.1.2 [SR 3.3.5.1.3] SR 3.3.5.1.5 SR 3.3.5.1.6 [SR 3.3.5.1.7]	≤ [1.44] psig
c. LPCI Pump A Start – Time Delay Relay	1,2,3, $_4$(a),$_5$(a)	[1]	C	SR 3.3.5.1.2 [SR 3.3.5.1.4] SR 3.3.5.1.6	≥ [ ] seconds and ≤ [5.25] seconds
d. Reactor Steam Dome Pressure – Low (Injection Permissive)	1,2,3	[3]	C	SR 3.3.5.1.1 SR 3.3.5.1.2 [SR 3.3.5.1.3] SR 3.3.5.1.5 SR 3.3.5.1.6 [SR 3.3.5.1.7]	≥ [452] psig and ≤ [534] psig
	$_4$(a),$_5$(a)	[3]	B	SR 3.3.5.1.1 SR 3.3.5.1.2 [SR 3.3.5.1.3] SR 3.3.5.1.5 SR 3.3.5.1.6 [SR 3.3.5.1.7]	≥ [452] psig and ≤ [534] psig
e. [LPCS Pump Discharge Flow – Low (Bypass)]	1,2,3, $_4$(a),$_5$(a)	[1]	E	SR 3.3.5.1.1 SR 3.3.5.1.2 [SR 3.3.5.1.3] SR 3.3.5.1.5 SR 3.3.5.1.6	≥ [ ] gpm and ≤ [ ] gpm
f. [LPCI Pump A Discharge Flow – Low (Bypass)]	1,2,3, $_4$(a),$_5$(a)	[1]	E	SR 3.3.5.1.1 SR 3.3.5.1.2 [SR 3.3.5.1.3] SR 3.3.5.1.5 SR 3.3.5.1.6	≥ [ ] gpm and ≤ [ ] gpm
g. Manual Initiation	1,2,3, $_4$(a),$_5$(a)	[1]	C	SR 3.3.5.1.6	NA

(continued)

(a) When associated ECCS subsystem(s) are required to be OPERABLE per LCO 3.5.2, ECCS-Shutdown.

(b) Also required to initiate the associated [Technical Specifications (TS) required functions].

Table 3.3.5.1-1 (page 2 of 5)
Emergency Core Cooling System Instrumentation

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FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
2. LPCI B and LPCI C Subsystems					
a. Reactor Vessel Water Level – Low Low Low, Level 1	1,2,3, 4(a),5(a)	[2](b)	B	SR 3.3.5.1.1 SR 3.3.5.1.2 [SR 3.3.5.1.3] SR 3.3.5.1.5 SR 3.3.5.1.6 [SR 3.3.5.1.7]	≥ [-152.5] inches
b. Drywell Pressure – High	1,2,3	[2](b)	B	SR 3.3.5.1.1 SR 3.3.5.1.2 [SR 3.3.5.1.3] SR 3.3.5.1.5 SR 3.3.5.1.6 [SR 3.3.5.1.7]	≤ [1.44] psig
c. LPCI Pump B Start – Time Delay Relay	1,2,3, 4(a),5(a)	[1]	C	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	≥ [ ] seconds and ≤ [5.25] seconds
d. Reactor Steam Dome Pressure – Low (Injection Permissive)	1,2,3	[3]	C	SR 3.3.5.1.1 SR 3.3.5.1.2 [SR 3.3.5.1.3] SR 3.3.5.1.5 SR 3.3.5.1.6 [SR 3.3.5.1.7]	≥ [452] psig and ≤ [534] psig
	4(a),5(a)	[3]	B	SR 3.3.5.1.1 SR 3.3.5.1.2 [SR 3.3.5.1.3] SR 3.3.5.1.5 SR 3.3.5.1.6 [SR 3.3.5.1.7]	≥ [452] psig and ≤ [534] psig
e. [LPCI Pump B and LPCI Pump C Discharge Flow – Low (Bypass)]	1,2,3, 4(a),5(a)	[2] [1 per pump]	E	SR 3.3.5.1.1 SR 3.3.5.1.2 [SR 3.3.5.1.3] SR 3.3.5.1.5 SR 3.3.5.1.6	≥ [ ] gpm and ≤ [ ] gpm
f. Manual Initiation	1,2,3, 4(a),5(a)	[1]	C	SR 3.3.5.1.6	NA

(continued)

(a) When associated ECCS subsystem(s) are required to be OPERABLE per LCO 3.5.2, ECCS-Shutdown.

(b) Also required to initiate the associated [TS required functions].

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Table 3.3.5.1-1 (page 3 of 5)
Emergency Core Cooling System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
3. High Pressure Core Spray (HPCS) System					
a. Reactor Vessel Water Level – Low Low, Level 2	1,2,3, 4(a),5(a)	[4](b)	B	SR 3.3.5.1.1 SR 3.3.5.1.2 [SR 3.3.5.1.3] SR 3.3.5.1.5 SR 3.3.5.1.6 SR 3.3.5.1.7	≥ [-43.8] inches
b. Drywell Pressure – High	1,2,3	[4](b)	B	SR 3.3.5.1.1 SR 3.3.5.1.2 [SR 3.3.5.1.3] SR 3.3.5.1.5 SR 3.3.5.1.6 SR 3.3.5.1.7	≤ [1.44] psig
c. Reactor Vessel Water Level – High, Level 8	1,2,3, 4(a),5(a)	[2]	C	SR 3.3.5.1.1 SR 3.3.5.1.2 [SR 3.3.5.1.3] SR 3.3.5.1.5 SR 3.3.5.1.6	≤ [55.7] inches
d. Condensate Storage Tank Level – Low	1,2,3, 4(c),5(c)	[2]	D	SR 3.3.5.1.1 SR 3.3.5.1.2 [SR 3.3.5.1.3] SR 3.3.5.1.5 SR 3.3.5.1.6	≥ [-3] inches
e. Suppression Pool Water Level – High	1,2,3	[2]	D	SR 3.3.5.1.1 SR 3.3.5.1.2 [SR 3.3.5.1.3] SR 3.3.5.1.5 SR 3.3.5.1.6	≤ [7.0] inches
f. [HPCS Pump Discharge Pressure – High (Bypass)]	1,2,3, 4(a),5(a)	[1]	E	SR 3.3.5.1.1 SR 3.3.5.1.2 [SR 3.3.5.1.3] SR 3.3.5.1.5 SR 3.3.5.1.6	≥ [ ] psig
g. [HPCS System Flow Rate – Low (Bypass)]	1,2,3, 4(a),5(a)	[1]	E	SR 3.3.5.1.1 SR 3.3.5.1.2 [SR 3.3.5.1.3] SR 3.3.5.1.5 SR 3.3.5.1.6	≥ [ ] gpm and ≤ [ ] gpm
h. Manual Initiation	1,2,3, 4(a),5(a)	[1]	C	SR 3.3.5.1.6	NA

(continued)

ECCS

(a) When associated subsystem(s) are required to be OPERABLE per LCO 3.5.2, ECCS-Shutdown.

(b) Also required to initiate the associated [TS required functions].

(c) When HPCS is OPERABLE for compliance with LCO 3.5.2, "ECCS – Shutdown," and aligned to the condensate storage tank while tank water level is not within the limit of SR 3.5.2.2.

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BACKGROUND

Diesel Generators (continued)

Feature (ESF) buses if a loss of offsite power occurs. (Refer to Bases for LCO 3.3.8.1.)

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

The actions of the ECCS are explicitly assumed in the safety analyses of References 1, 2, and 3. The ECCS is initiated to preserve the integrity of the fuel cladding by limiting the post LOCA peak cladding temperature to less than the 10 CFR 50.46 limits.

ECCS instrumentation satisfies Criterion 3 of the NRC Policy Statement. Certain instrumentation Functions are retained for other reasons and are described below in the individual Functions discussion.

The OPERABILITY of the ECCS instrumentation is dependent upon the OPERABILITY of the individual instrumentation channel Functions specified in Table 3.3.5.1-1. Each Function must have a required number of OPERABLE channels, with their setpoints within the specified Allowable Values, where appropriate. The actual setpoint is calibrated consistent with applicable setpoint methodology assumptions. Each ECCS subsystem must also respond within its assumed response time. Table 3.3.5.1-1, footnote (b) is added to show that certain ECCS instrumentation Functions are also required to be OPERABLE to perform DG initiation and actuation of other Technical Specifications (TS) equipment.

(Insert 1)

Allowable Values are specified for each ECCS Function specified in the table. Nominal trip setpoints are specified in the setpoint calculations. The nominal setpoints are selected to ensure that the setpoints do not exceed the Allowable Value between CHANNEL CALIBRATIONS. Operation with a trip setpoint less conservative than the nominal trip setpoint, but within its Allowable Value, is acceptable. A channel is inoperable if its actual trip setpoint is not within its required Allowable Value. Trip setpoints are those predetermined values of output at which an action should take place. The setpoints are compared to the actual process parameter (e.g., reactor vessel water level), and when the measured output value of the process parameter exceeds the setpoint, the associated device (e.g., trip unit) changes state. The analytic limits are derived

(continued)

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

1.a, 2.a Reactor Vessel Water Level—Low Low Low, Level 1 (continued)

Reactor Vessel Water Level—Low Low Low, Level 1 signals are initiated from four level transmitters that sense the difference between the pressure due to a constant column of water (reference leg) and the pressure due to the actual water level (variable leg) in the vessel.
The Reactor Vessel Water Level—Low Low Low, Level 1 Allowable Value is chosen to allow time for the low pressure core flooding systems to activate and provide adequate cooling.

Two channels of Reactor Vessel Water Level—Low Low Low, Level 1 Function per associated Division are only required to be OPERABLE when the associated ECCS or DG is required to be OPERABLE, to ensure that no single instrument failure can preclude ECCS initiation. (Two channels input to LPCS and LPCI A, while the other two channels input to LPCI B and LPCI C.) Refer to LCO 3.5.1 and LCO 3.5.2, "ECCS—Shutdown," for Applicability Bases for the low pressure ECCS subsystems; LCO 3.8.1, "AC Sources—Operating"; and LCO 3.8.2, "AC Sources—Shutdown," for Applicability Bases for the DGs.

(Insert 2)

1.b, 2.b. Drywell Pressure—High

High pressure in the drywell could indicate a break in the reactor coolant pressure boundary (RCPB). The low pressure ECCS and associated DGs are initiated upon receipt of the Drywell Pressure—High Function in order to minimize the possibility of fuel damage. The core cooling function of the ECCS, along with the scram action of the RPS, ensures that the fuel peak cladding temperature remains below the limits of 10 CFR 50.46.

High drywell pressure signals are initiated from four pressure transmitters that sense drywell pressure. The Allowable Value was selected to be as low as possible and be indicative of a LOCA inside primary containment. Negative barometric fluctuations are accounted for in the Allowable Value.

The Drywell Pressure—High Function is required to be OPERABLE when the associated ECCS and DGs are required to be OPERABLE in conjunction with times when the primary

(continued)

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BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

1.c, 2.c. Low Pressure Coolant Injection Pump A and Pump B Start—Time Delay Relay (continued)

complete before starting the second pump on the same 4.16 kV emergency bus and short enough so that ECCS operation is not degraded.

Each LPCI Pump Start—Time Delay Relay Function is only required to be OPERABLE when the associated LPCI subsystem is required to be OPERABLE. Refer to LCO 3.5.1 and LCO 3.5.2 for Applicability Bases for the LPCI subsystems.

<INSERT 2>

1.d, 2.d. Reactor Steam Dome Pressure—Low (Injection Permissive)

Low reactor steam dome pressure signals are used as permissives for the low pressure ECCS subsystems. This ensures that, prior to opening the injection valves of the low pressure ECCS subsystems, the reactor pressure has fallen to a value below these subsystems' maximum design pressure. The Reactor Steam Dome Pressure—Low is one of the Functions assumed to be OPERABLE and capable of permitting initiation of the ECCS during the transients analyzed in References 1 and 3. In addition, the Reactor Steam Dome Pressure—Low Function is directly assumed in the analysis of the recirculation line break (Ref. 2). The core cooling function of the ECCS, along with the scram action of the RPS, ensures that the fuel peak cladding temperature remains below the limits of 10 CFR 50.46.

The Reactor Steam Dome Pressure—Low signals are initiated from four pressure transmitters that sense the reactor dome pressure. The four pressure transmitters each drive a master and slave trip unit (for a total of eight trip units).

The Allowable Value is low enough to prevent overpressurizing the equipment in the low pressure ECCS, but high enough to ensure that the ECCS injection prevents the fuel peak cladding temperature from exceeding the limits of 10 CFR 50.46.

Three channels of Reactor Steam Dome Pressure—Low Function per associated Division are only required to be OPERABLE when the associated ECCS is required to be OPERABLE to ensure that no single instrument failure can preclude ECCS

(continued)

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BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

1.d, 2.d. Reactor Steam Dome Pressure—Low (Injection Permissive) (continued)

initiation. (Three channels are required for LPCS and LPCI A, while three other channels are required for LPCI B and LPCI C.) Refer to LCO 3.5.1 and LCO 3.5.2 for Applicability Bases for the low pressure ECCS subsystems.

INSERT 2

1.e, 1.f, 2.e. Low Pressure Coolant Injection and Low Pressure Core Spray Pump Discharge Flow—Low (Bypass)

The minimum flow instruments are provided to protect the associated low pressure ECCS pump from overheating when the pump is operating and the associated injection valve is not fully open. The minimum flow line valve is opened when low flow is sensed, and the valve is automatically closed when the flow rate is adequate to protect the pump. The LPCI and LPCS Pump Discharge Flow—Low Functions are assumed to be OPERABLE and capable of closing the minimum flow valves to ensure that the low pressure ECCS flows assumed during the transients and accidents analyzed in References 1, 2, and 3 are met. The core cooling function of the ECCS, along with the scram action of the RPS, ensures that the fuel peak cladding temperature remains below the limits of 10 CFR 50.46.

One flow transmitter per ECCS pump is used to detect the associated subsystems' flow rates. The logic is arranged such that each transmitter causes its associated minimum flow valve to open. The logic will close the minimum flow valve once the closure setpoint is exceeded. The LPCI minimum flow valves are time delayed such that the valves will not open for 10 seconds after the switches detect low flow. The time delay is provided to limit reactor vessel inventory loss during the startup of the RHR shutdown cooling mode (for RHR A and RHR B). The Pump Discharge Flow—Low Allowable Values are high enough to ensure that the pump flow rate is sufficient to protect the pump, yet low enough to ensure that the closure of the minimum flow valve is initiated to allow full flow into the core.

Each channel of Pump Discharge Flow—Low Function (one LPCS channel and three LPCI channels) is only required to be OPERABLE when the associated ECCS is required to be OPERABLE, to ensure that no single instrument failure can preclude the ECCS function. Refer to LCO 3.5.1 and

(continued)

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BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

1.e, 1.f, 2.e. Low Pressure Coolant Injection and Low Pressure Core Spray Pump Discharge Flow—Low (Bypass) (continued)

LCO 3.5.2 for Applicability Bases for the low pressure ECCS subsystems.

1.g, 2.f. Manual Initiation

The Manual Initiation push button channels introduce signals into the appropriate ECCS logic to provide manual initiation capability and are redundant to the automatic protective instrumentation. There is one push button for each of the two Divisions of low pressure ECCS (i.e., Division 1 ECCS, LPCS and LPCI A; Division 2 ECCS, LPCI B and LPCI C).

The Manual Initiation Function is not assumed in any accident or transient analyses in the FSAR. However, the Function is retained for overall redundancy and diversity of the low pressure ECCS function as required by the NRC in the plant licensing basis.

There is no Allowable Value for this Function since the channels are mechanically actuated based solely on the position of the push buttons. Each channel of the Manual Initiation Function (one channel per Division) is only required to be OPERABLE when the associated ECCS is required to be OPERABLE. Refer to LCO 3.5.1 and LCO 3.5.2 for Applicability Bases for the low pressure ECCS subsystems.

<INSERT 2>

High Pressure Core Spray System

3.a. Reactor Vessel Water Level—Low Low, Level 2

Low RPV water level indicates that the capability to cool the fuel may be threatened. Should RPV water level decrease too far, fuel damage could result. Therefore, the HPCS System and associated DG is initiated at Level 2 to maintain level above the top of the active fuel. The Reactor Vessel Water Level—Low Low, Level 2 is one of the Functions assumed to be OPERABLE and capable of initiating HPCS during the transients analyzed in References 1 and 3. The Reactor Vessel Water Level—Low Low, Level 2 Function associated with HPCS is directly assumed in the analysis of the recirculation line break (Ref. 2). The core cooling

(continued)

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BASES

LCO (continued) (ESF) bus required OPERABLE by LCO 3.8.10, ensures a diverse power source is available to provide electrical power support, assuming a loss of the offsite circuit. Similarly, when the high pressure core spray (HPCS) is required to be OPERABLE, a separate offsite circuit to the Division 3 Class 1E onsite electrical power distribution subsystem, or an OPERABLE Division 3 DG, ensures an additional source of power for the HPCS. This additional source for Division 3 is not necessarily required to be connected to be OPERABLE. Either the circuit required by LCO Item a., or a circuit required to meet LCO Item c. may be connected, with the second source available for connection. Together, OPERABILITY of the required offsite circuit(s) and DG(s) ensure the availability of sufficient AC sources to operate the plant in a safe manner and to mitigate the consequences of postulated events during shutdown (e.g., fuel handling accidents, reactor vessel draindown).

<Insert 3>

The qualified offsite circuit(s) must be capable of maintaining rated frequency and voltage while connected to their respective ESF bus(es), and of accepting required loads during an accident. Qualified offsite circuits are those that are described in the FSAR and are part of the licensing basis for the plant. [The offsite circuit consists of incoming breaker and disconnect to the respective service transformers 11 and 21, the 11 and 21 service transformers, the ESF transformers 11 and 21, and the respective circuit path including feeder breakers to all 4.16 kV ESF buses required by LCO 3.8.10.]

The required DG must be capable of starting, accelerating to rated speed and voltage, and connecting to its respective ESF bus on detection of bus undervoltage, and accepting required loads. This sequence must be accomplished within [10] seconds. Each DG must also be capable of accepting required loads within the assumed loading sequence intervals, and must continue to operate until offsite power can be restored to the ESF buses. These capabilities are required to be met from a variety of initial conditions such as: DG in standby with the engine hot and DG in standby with the engine at ambient conditions. Additional DG capabilities must be demonstrated to meet required Surveillances, e.g., capability of the DG to revert to standby status on an ECCS signal while operating in parallel test mode.

(continued)