

**Industry/TSTF Standard Technical Specification Change Traveler**

**3.3.9 and 3.3.10 - Delete flux monitors specific overlap requirement SRs**

Priority/Classification 1) Correct Specifications

NUREGs Affected:  1430  1431  1432  1433  1434

**Description:**

Delete BWOG SR 3.3.9.3 and SR 3.3.10.3 and BWR/4 and BWR/6 3.3.1.1.6 and 3.3.1.1.7 which require verification of one decade of overlap for the source range monitors and intermediate range monitors indication and for the intermediate range and power range (APRM for BWRs) monitors. Add statement to neutron flux CHANNEL CHECK Bases for clarity of application.

**Justification:**

These SRs are unnecessary in that they duplicate the requirements of the CHANNEL CHECK required by (BWOG) SR 3.3.9.1 and SR 3.3.10.1 and (BWRs) SR 3.3.1.1.1. Further, failure of the SR requires that the source range monitor or intermediate range monitor be considered inoperable even when they are calibrated and fully OPERABLE in every other way, i.e., capable of performing their safety function. This is true even if it is clear the overlap does not exist due to failure of the other flux monitors, i.e., intermediate range monitors or power range monitors (APRM for BWRs), since SR 3.0.1 says that failure to meet the SR is failure to meet the LCO and the SR requires overlap.

The CHANNEL CHECK also provides the requirement since a lack of expected overlap would constitute failure of the channel to meet the established "agreement criteria." However, the CHANNEL CHECK agreement criterion can be established to provide this requirement with appropriate flexibility to determine the inoperable components and initiate appropriate actions. For example, initially, the failure to meet the CHANNEL CHECK should be attributed to the indication which is not yet in use but was about to be placed in use, since the equipment in use has been providing the expected readings up to that point. This would prevent the indication which was about to be placed in use from being declared OPERABLE and also prevent any associated MODE change, or if the equipment not in use was already considered OPERABLE, this would result in its inoperability and prevent the power change. This can be applied to either startup or shutdown (notwithstanding appropriate application of the unit specific LCO 3.0.4.).

This change is consistent with source range, intermediate range, and power range neutron flux instrumentation requirements in NUREG-1431 for Westinghouse and NUREG-1432 for Combustion Engineering, neither of which include specific SRs verifying overlap requirements.

**Revision History**

**OG Revision 0**

**Revision Status: Active**

**Next Action: NRC**

Revision Proposed by: Oconec

Revision Description:  
Original Issue

**Owners Group Review Information**

Date Originated by OG: 06-Nov-97

Owners Group Comments  
ONS-21

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

4/28/98

**TSTF Review Information**

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

OG Review Completed:  BWO  WOG  CEOG  BWROG

## TSTF Comments:

1. W and CE have no SR for overlap for IR or SR
2. Applicable to BWR4 and BWR6
3. Delete the SR and the BWR Bases
4. Put the existing BWR Bases in the BWR NUREGs for the inserts
5. The BWR and BWO Chairperson want to review and approve the change prior to sending to the NRC

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**

SR 3.3.1.1 Bases	RPS Instrumentation	NUREG(s)- 1430 Only
SR 3.3.9.1 Bases	Source Range Neutron Flux	NUREG(s)- 1430 Only
SR 3.3.9.3	Source Range Neutron Flux Change Description: Deleted	NUREG(s)- 1430 Only
SR 3.3.9.3 Bases	Source Range Neutron Flux Change Description: Deleted	NUREG(s)- 1430 Only
SR 3.3.10.1 Bases	Intermediate Range Neutron Flux	NUREG(s)- 1430 Only
SR 3.3.10.3	Intermediate Range Neutron Flux Change Description: Deleted	NUREG(s)- 1430 Only
SR 3.3.10.3 Bases	Intermediate Range Neutron Flux Change Description: Deleted	NUREG(s)- 1430 Only
LCO 3.3.1.1	RPS Instrumentation Change Description: Table 3.3.1.1-1	NUREG(s)- 1433 1434 Only
SR 3.3.1.1.1 Bases	RPS Instrumentation	NUREG(s)- 1433 1434 Only
SR 3.3.1.1.2 Bases	RPS Instrumentation	NUREG(s)- 1433 1434 Only
Bkgnd 3.3.1.2 Bases	SRM Instrumentation	NUREG(s)- 1433 1434 Only
Action 3.3.1.2.A Bases	SRM Instrumentation	NUREG(s)- 1433 1434 Only
SR 3.3.1.6	RPS Instrumentation Change Description: Deleted	NUREG(s)- 1433 1434 Only

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SR 3.3.1.6 Bases	RPS Instrumentation	NUREG(s)- 1433 1434 Only
	Change Description: Deleted	
SR 3.3.1.7	RPS Instrumentation	NUREG(s)- 1433 1434 Only
	Change Description: Deleted	
SR 3.3.1.7 Bases	RPS Instrumentation	NUREG(s)- 1433 1434 Only
	Change Description: Deleted	
SR 3.3.1.8	RPS Instrumentation	NUREG(s)- 1433 1434 Only
	Change Description: Relabeled 3.3.1.6	
SR 3.3.1.8 Bases	RPS Instrumentation	NUREG(s)- 1433 1434 Only
	Change Description: Relabeled 3.3.1.6	
SR 3.3.1.9	RPS Instrumentation	NUREG(s)- 1433 1434 Only
	Change Description: Relabeled 3.3.1.7	
SR 3.3.1.9 Bases	RPS Instrumentation	NUREG(s)- 1433 1434 Only
	Change Description: Relabeled 3.3.1.7	
SR 3.3.1.10	RPS Instrumentation	NUREG(s)- 1433 1434 Only
	Change Description: Relabeled 3.3.1.8	
SR 3.3.1.10 Bases	RPS Instrumentation	NUREG(s)- 1433 1434 Only
	Change Description: Relabeled 3.3.1.8	
SR 3.3.1.11	RPS Instrumentation	NUREG(s)- 1433 1434 Only
	Change Description: Relabeled 3.3.1.9	
SR 3.3.1.11 Bases	RPS Instrumentation	NUREG(s)- 1433 1434 Only
	Change Description: Relabeled 3.3.1.9	
SR 3.3.1.12	RPS Instrumentation	NUREG(s)- 1433 1434 Only
	Change Description: Relabeled 3.3.1.10	
SR 3.3.1.12 Bases	RPS Instrumentation	NUREG(s)- 1433 1434 Only
	Change Description: Relabeled 3.3.1.10	
SR 3.3.1.13	RPS Instrumentation	NUREG(s)- 1433 1434 Only
	Change Description: Relabeled 3.3.1.11	
SR 3.3.1.13 Bases	RPS Instrumentation	NUREG(s)- 1433 1434 Only
	Change Description: Relabeled 3.3.1.11	
SR 3.3.1.14	RPS Instrumentation	NUREG(s)- 1433 1434 Only
	Change Description: Relabeled 3.3.1.12	
SR 3.3.1.14 Bases	RPS Instrumentation	NUREG(s)- 1433 1434 Only
	Change Description: Relabeled 3.3.1.12	
SR 3.3.1.15	RPS Instrumentation	NUREG(s)- 1433 1434 Only
	Change Description: Relabeled 3.3.1.13	

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SR 3.3.1.15 Bases	RPS Instrumentation	NUREG(s)- 1433 1434 Only
	Change Description: Relabeled 3.3.1.13	
SR 3.3.1.16	RPS Instrumentation	NUREG(s)- 1433 1434 Only
	Change Description: Relabeled 3.3.1.14	
SR 3.3.1.16 Bases	RPS Instrumentation	NUREG(s)- 1433 1434 Only
	Change Description: Relabeled 3.3.1.14	
SR 3.3.1.17	RPS Instrumentation	NUREG(s)- 1433 1434 Only
	Change Description: Relabeled 3.3.1.15	
SR 3.3.1.17 Bases	RPS Instrumentation	NUREG(s)- 1433 1434 Only
	Change Description: Relabeled 3.3.1.15	

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INSERT 1 (BWO)

The agreement criteria includes an expectation of one decade of overlap when transitioning between neutron flux instrumentation. For example, during a power increase near the top of the scale for the intermediate range monitors, a power range monitor reading is expected with at least one decade overlap. Without such an overlap, the power range monitors are considered inoperable unless it is clear that an intermediate range monitor inoperability is responsible for the lack of the expected overlap.

INSERT 2 (BWO)

The agreement criteria includes an expectation of one decade of overlap when transitioning between neutron flux instrumentation. For example, during a power reduction near the bottom of the scale for the intermediate range monitors, a source range monitor reading is expected with at least one decade overlap. Without such an overlap, the source range monitors are considered inoperable unless it is clear that an intermediate range monitor inoperability is responsible for the lack of the expected overlap.

INSERT 3 (BWO)

The agreement criteria includes an expectation of one decade of overlap when transitioning between neutron flux instrumentation. For example, during a power increase near the top of the scale for the source range monitors, an intermediate range monitor reading is expected with at least one decade overlap. Without such an overlap, the intermediate range monitors are considered inoperable unless it is clear that a source range monitor inoperability is responsible for the lack of the expected overlap. Further, during a power reduction near the bottom of the scale for the power range monitors, an intermediate range monitor reading is expected with at least one decade overlap. Without such an overlap, the intermediate range monitors are considered inoperable unless it is clear that a power range monitor inoperability is responsible for the lack of the expected overlap.

INSERT 4 (BWR/4 and BWR/6)

The agreement criteria includes an expectation of one decade of overlap when transitioning between neutron flux instrumentation. The overlap between SRMs and IRMs must be demonstrated prior to withdrawing SRMs from the fully inserted position since indication is being transitioned from the SRMs to the IRMs. This will ensure that reactor power will not be increased into a neutron flux region without adequate indication. The overlap between IRMs and APRMs is of concern when reducing power into the IRM range (entry into MODE 2 from MODE 1). On power increases, the system design will prevent further increases (by initiating a rod block) if adequate overlap is not maintained. Overlap between IRMs and APRMs exists when sufficient IRMs and APRMs concurrently have onscale readings such that the transition between MODE 1 and MODE 2 can be made without either APRM downscale rod block, or IRM upscale rod block. Overlap between SRMs and IRMs similarly exists when, prior to withdrawing the SRMs from the fully inserted position, IRMs are above mid-scale on range 1 before SRMs have reached the upscale rod block.

If overlap for a group of channels is not demonstrated (e.g., IRM/APRM overlap), the reason for the failure of the Surveillance should be determined and the appropriate channel(s) declared inoperable. Only those appropriate channels that are required in the current MODE or condition should be declared inoperable.

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SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
SR 3.3.9.3 Verify at least one decade overlap with intermediate range neutron flux channels.	Once each reactor startup prior to source range counts exceeding $10^5$ cps if not performed within the previous 7 days

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SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.3.10.2 -----NOTE----- Neutron detectors are excluded from CHANNEL CALIBRATION. -----</p> <p>Perform CHANNEL CALIBRATION.</p>	<p>[18] months</p>
<p>SR 3.3.10.3 Verify at least one decade overlap with power range neutron flux channels.</p>	<p>Once each reactor startup prior to intermediate range indication exceeding 1E-6 amp if not performed within the previous 7 days</p>

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BASES (continued)

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SURVEILLANCE  
REQUIREMENTS

The SRs for each RPS Function are identified by the SRs column of Table 3.3.1-1 for that Function. Most Functions are subject to CHANNEL CHECK, CHANNEL FUNCTIONAL TEST, CHANNEL CALIBRATION, and RPS RESPONSE TIME testing.

The SRs are modified by a Note. The [first] Note directs the reader to Table 3.3.1-1 to determine the correct SRs to perform for each RPS Function.

Reviewer's Note: The CHANNEL FUNCTIONAL TEST Frequencies are based on approved topical reports. For a licensee to use these times, the licensee must justify the Frequencies as required by the NRC Staff SER for the topical report.

SR 3.3.1.1

Performance of the CHANNEL CHECK once every 12 hours ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between two instrument channels could be an indication of excessive instrument drift in one of the channels or of something even more serious. CHANNEL CHECK will detect gross channel failure; therefore, it is key in verifying that the instrumentation continues to operate properly between each CHANNEL CALIBRATION.

Agreement criteria are determined by the unit staff based on a combination of the channel instrument uncertainties, including isolation, indication, and readability. If a channel is outside the criteria, it may be an indication that the transmitter or the signal processing equipment has drifted outside its limit. If the channels are within the criteria, it is an indication that the channels are OPERABLE. If the channels are normally off scale during times when surveillance is required, the CHANNEL CHECK will only verify that they are off scale in the same direction. Off scale low current loop channels are verified to be reading at the bottom of the range and not failed downscale.

Insert 1 →

The Frequency, about once every shift, is based on operating experience that demonstrates channel failure is rare. Since

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BASES

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ACTIONS

C.1 (continued)

operation is allowed with one or more source range neutron flux channels inoperable. The ability to continue operation is justified because the instrumentation does not provide a safety function during high power operation. However, actions are initiated within 1 hour to restore the channel(s) to OPERABLE status for future availability. The Completion Time of 1 hour is sufficient to initiate the action. The action must continue until channels are restored to OPERABLE status.

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SURVEILLANCE  
REQUIREMENTS

SR 3.3.9.1

Performance of the CHANNEL CHECK once every 12 hours ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the two instrument channels could be an indication of excessive instrument drift in one of the channels or of something even more serious. CHANNEL CHECK will detect gross channel failure; therefore, it is key in verifying that the instrumentation continues to operate properly between each CHANNEL CALIBRATION.

Agreement criteria are determined by the unit staff, based on a combination of the channel instrument uncertainties, including isolation, indication, and readability. If a channel is outside the criteria, it may be an indication that the transmitter or the signal processing equipment has drifted outside its limit. If the channels are within the criteria, it is an indication that the channels are OPERABLE. If the channels are normally off scale during times when surveillance is required, the CHANNEL CHECK will only verify that they are off scale in the same direction. Off scale low current loop channels are verified to be reading at the bottom of the range and not failed downscale.

Insert 2

→ The Frequency, about once every shift, is based on operating experience that demonstrates channel failure is rare. Since

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BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.3.9.1 (continued)

the probability of two random failures in redundant channels in any 12 hour period is extremely low, the CHANNEL CHECK minimizes the chance of loss of protective function due to failure of redundant channels. The CHANNEL CHECK supplements less formal, but more frequent, checks of channel OPERABILITY during normal operational use of the displays associated with the LCO's required channels. When operating in Required Action A.1, CHANNEL CHECK is still required. However, in this condition, a redundant source range is not available for comparison. CHANNEL CHECK may still be performed via comparison with intermediate range detectors, if available, and verification that the OPERABLE source range channel is energized and indicating a value consistent with current unit status.

SR 3.3.9.2

For source range neutron flux channels, CHANNEL CALIBRATION is a complete check and readjustment of the channels from the preamplifier input to the indicators. This test verifies the channel responds to measured parameters within the necessary range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drift to ensure that the instrument channel remains operational between successive tests.

The SR is modified by a Note excluding neutron detectors from CHANNEL CALIBRATION. It is not necessary to test the detectors because generating a meaningful test signal is difficult. The detectors are of simple construction, and any failures in the detectors will be apparent as change in channel output.

The Frequency of [18] months is based on demonstrated instrument CHANNEL CALIBRATION reliability over an [18] month interval, such that the instrument is not adversely affected by drift.

SR 3.3.9.3

~~SR 3.3.9.3 is the verification of one decade of overlap with the intermediate range neutron flux instrumentation prior to~~

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BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.3.9.3 (continued)

source range count rate exceeding  $10^5$  cps if not performed within 7 days prior to reactor startup. This ensures a continuous source of power indication during the approach to criticality. Failure to perform this Surveillance leaves the unit in a safe, subcritical condition until the verification can be made. The test may be omitted if performed within the previous 7 days based on operating experience, which shows that source range and intermediate range instrument overlap does not change appreciably within this test interval.

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REFERENCES

None.

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BASES

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ACTIONS

B.1 and B.2 (continued)

reactor in the next lowest condition for which the intermediate range instrumentation is not required. This involves providing power level indication on the source range instrumentation by immediately suspending operations involving positive reactivity changes and, within 1 hour, placing the reactor in the tripped condition with the CRD trip breakers open. The Completion Times are based on unit operating experience and allow the operators sufficient time to manually insert the CONTROL RODS prior to opening the CRD breakers.

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SURVEILLANCE  
REQUIREMENTS

SR 3.3.10.1

Performance of the CHANNEL CHECK once every 12 hours ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the two instrument channels could be an indication of excessive instrument drift in one of the channels or of something even more serious. CHANNEL CHECK will detect gross channel failure; therefore, it is key in verifying that the instrumentation continues to operate properly between each CHANNEL CALIBRATION.

Agreement criteria are determined by the unit staff based on a combination of the channel instrument uncertainties, including isolation, indication, and readability. If a channel is outside the criteria, it may be an indication that the transmitter or the signal processing equipment has drifted outside its limit. If the channels are within the criteria, it is an indication that the channels are OPERABLE.

Insert 3 →

The Frequency, about once every shift, is based on operating experience that demonstrates channel failure is rare. Since the probability of two random failures in redundant channels in any 12 hour period is extremely low, the CHANNEL CHECK minimizes the chance of loss of protective function due to

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BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.3.10.1 (continued)

failure of redundant channels. The CHANNEL CHECK supplements less formal, but more frequent, checks of channel OPERABILITY during normal operational use of the displays associated with the LCO's required channels.

When operating in Required Action A.1, CHANNEL CHECK is still required. However, in this condition, a redundant intermediate range is not available for comparison. CHANNEL CHECK may still be performed via comparison with power or source range detectors, if available, and verification that the OPERABLE intermediate range channel is energized and indicates a value consistent with current unit status.

SR 3.3.10.2

For intermediate range neutron flux channels, CHANNEL CALIBRATION is a complete check and readjustment of the channels, from the preamplifier input to the indicators. This test verifies the channel responds to a measured parameter within the necessary range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drift to ensure that the instrument channel remains operational between successive tests.

The SR is modified by a Note excluding neutron detectors from CHANNEL CALIBRATION. It is not necessary to test the detectors because generating a meaningful test signal is difficult. In addition, the detectors are of simple construction, and any failures in the detectors will be apparent as a change in channel output. The Frequency is based on operating experience and consistency with the typical industry refueling cycle and is justified by demonstrated instrument reliability over an [18] month interval such that the instrument is not adversely affected by drift.

SR 3.3.10.3

~~SR 3.3.10.3 is the verification within 7 days prior to reactor startup of one decade of overlap with the power range neutron flux instrumentation prior to intermediate range indication exceeding  $1E-6$  amp. This ensures a~~

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BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.3.10.3 (continued)

continuous source of power indication during the approach to criticality. Failure to perform this Surveillance leaves the unit in a condition where the intermediate range channels provide adequate protection until the verification can be made.

The test may be omitted if performed within the previous 7 days based on operating experience, which shows that intermediate range instrument overlap does not change appreciably within this test interval.

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REFERENCES

None.

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SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
SR 3.3.1.1.5 Perform CHANNEL FUNCTIONAL TEST.	7 days
<del>SR 3.3.1.1.6 Verify the source range monitor (SRM) and intermediate range monitor (IRM) channels overlap.</del>	<del>Prior to withdrawing SRMs from the fully inserted position</del>
SR 3.3.1.1.7 -----NOTE----- Only required to be met during entry into MODE 2 from MODE 1. ----- Verify the IRM and APRM channels overlap.	7 days
SR 3.3.1.1.8 <sup>6</sup> Calibrate the local power range monitors.	1000 MWD/T average core exposure
SR 3.3.1.1.9 <sup>7</sup> Perform CHANNEL FUNCTIONAL TEST.	[92] days
[ SR 3.3.1.1.10 <sup>8</sup> Calibrate the trip units. ]	[92] days ]

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SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.3.1.1.11<sup>(9)</sup> -----NOTES-----            1. Neutron detectors are excluded.            2. For Function 2.a, not required to be performed when entering MODE 2 from MODE 1 until 12 hours after entering MODE 2.            -----            Perform CHANNEL CALIBRATION.</p>	184 days
<p>SR 3.3.1.1.12<sup>(10)</sup> Perform CHANNEL FUNCTIONAL TEST.</p>	[18] months
<p>SR 3.3.1.1.13<sup>(11)</sup> -----NOTES-----            1. Neutron detectors are excluded.            2. For Function 1, not required to be performed when entering MODE 2 from MODE 1 until 12 hours after entering MODE 2.            -----            Perform CHANNEL CALIBRATION.</p>	[18] months
<p>SR 3.3.1.1.14<sup>(12)</sup> Verify the APRM Flow Biased Simulated Thermal Power—High time constant is <math>\leq</math> [7] seconds.</p>	[18] months
<p>SR 3.3.1.1.15<sup>(13)</sup> Perform LOGIC SYSTEM FUNCTIONAL TEST.</p>	[18] months

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SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
SR 3.3.1.1.16 <sup>(14)</sup> Verify Turbine Stop Valve—Closure and Turbine Control Valve Fast Closure, Trip Oil Pressure—Low Functions are not bypassed when THERMAL POWER is $\geq$ [30]% RTP.	[18] months
SR 3.3.1.1.17 <sup>19</sup> -----NOTES----- 1. Neutron detectors are excluded. 2. For Function 5 "n" equals 4 channels for the purpose of determining the the STAGGERED TEST BASIS Frequency. ----- Verify the RPS RESPONSE TIME is within limits.	[18] months on a STAGGERED TEST BASIS

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Table 3.3.1.1-1 (page 1 of 3)  
Reactor Protection System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	CONDITIONS REFERENCED FROM REQUIRED ACTION D.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Intermediate Range Monitors	2	[3]	G	SR 3.3.1.1.1 SR 3.3.1.1.4 <del>SR 3.3.1.1.6</del> <del>SR 3.3.1.1.7</del> SR 3.3.1.1.11 SR 3.3.1.1.13	≤ [120/125] divisions of full scale
a. Neutron Flux - High	5(a)	[3]	H	SR 3.3.1.1.1 SR 3.3.1.1.5 SR 3.3.1.1.8 SR 3.3.1.1.13	≤ [120/125] divisions of full scale
b. Inop	2	[3]	G	SR 3.3.1.1.4 SR 3.3.1.1.13	NA -13
	5(a)	[3]	H	SR 3.3.1.1.5 SR 3.3.2.2.13	NA -13
2. Average Power Range Monitors					
a. Neutron Flux - High, Setdown	2	[2]	G	SR 3.3.1.1.1 SR 3.3.1.1.4 <del>SR 3.3.1.1.7</del> SR 3.3.1.1.8 SR 3.3.1.1.9 SR 3.3.1.1.13	≤ [20]% RTP -6 -9 -13
b. Flow Biased Simulated Thermal Power - High	1	[2]	F	SR 3.3.1.1.1 SR 3.3.1.1.2 SR 3.3.1.1.3 SR 3.3.1.1.8 SR 3.3.1.1.9 SR 3.3.1.1.11 SR 3.3.1.1.12 SR 3.3.1.1.13	≤ [0.58 W + 62% RTP and 115.5% RTP(b)] -6 -7 -9 -12 -13

15 (continued)

- (a) With any control rod withdrawn from a core cell containing one or more fuel assemblies.
- (b) [0.58 W + 62% - 0.58 ΔW]RTP when reset for single loop operation per LCO 3.4.1, "Recirculation Loops Operating."

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Table 3.3.1.1-1 (page 2 of 3)  
Reactor Protection System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	CONDITIONS REFERENCED FROM REQUIRED ACTION D.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
2. Average Power Range Monitors (continued)					
c. Fixed Neutron Flux - High	1	[2]	F	SR 3.3.1.1.1 SR 3.3.1.1.2 SR 3.3.1.1.6 - 6 SR 3.3.1.1.7 - 7 SR 3.3.1.1.9 - 9 SR 3.3.1.1.13 - 13 SR 3.3.1.1.15 - 15	≤ [120]% RTP
d. Downscale	1	[2]	F	SR 3.3.1.1.6 - 6 SR 3.3.1.1.7 - 7 SR 3.3.1.1.13 - 13	≥ [3]% RTP
e. Inop	1,2	[2]	G	SR 3.3.1.1.6 - 6 SR 3.3.1.1.7 - 7 SR 3.3.1.1.13 - 13	NA
3. Reactor Vessel Steam Dome Pressure - High	1,2	[2]	G	SR 3.3.1.1.1 SR 3.3.1.1.7 - 7 [SR 3.3.1.1.8 - 8 SR 3.3.1.1.11 - 11 SR 3.3.1.1.13 - 13 SR 3.3.1.1.15 - 15	≤ [1054] psig
4. Reactor Vessel Water Level - Low, Level 3	1,2	[2]	G	SR 3.3.1.1.1 SR 3.3.1.1.7 - 7 [SR 3.3.1.1.8 - 8 SR 3.3.1.1.11 - 11 SR 3.3.1.1.13 - 13 SR 3.3.1.1.15 - 15	≥ [10] inches
5. Main Steam Isolation Valve - Closure	1	[8]	F	SR 3.3.1.1.7 - 7 SR 3.3.1.1.11 - 11 SR 3.3.1.1.13 - 13 SR 3.3.1.1.15 - 15	≤ [10]% closed
6. Drywell Pressure - High	1,2	[2]	G	SR 3.3.1.1.1 SR 3.3.1.1.7 - 7 [SR 3.3.1.1.8 - 8 SR 3.3.1.1.11 - 11 SR 3.3.1.1.13 - 13	≤ [1.92] psig

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Table 3.3.1.1-1 (page 3 of 3)  
Reactor Protection System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	CONDITIONS REFERENCED FROM REQUIRED ACTION D.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
<b>7. Scram Discharge Volume Water Level - High</b>					
a. Resistance Temperature Detector	1,2	[2]	G	SR 3.3.1.1.1 SR 3.3.1.1.10 [SR 3.3.1.1.10] - 7 SR 3.3.1.1.11 SR 3.3.1.1.13	≤ [57.15] gallons
	5(a)	[2]	H	SR 3.3.1.1.1 SR 3.3.1.1.10 - 7 [SR 3.3.1.1.10] - 8 SR 3.3.1.1.11 SR 3.3.1.1.13	≤ [57.15] gallons
b. Float Switch	1,2	[2]	G	SR 3.3.1.1.10 - 7 SR 3.3.1.1.11 SR 3.3.1.1.13	≤ [57.15] gallons
	5(a)	[2]	H	SR 3.3.1.1.10 - 7 SR 3.3.1.1.11 SR 3.3.1.1.13	≤ [57.15] gallons
8. Turbine Stop Valve - Closure	≥ [30]% RTP	[4]	E	SR 3.3.1.1.10 - 7 [SR 3.3.1.1.10] - 8 SR 3.3.1.1.11 SR 3.3.1.1.13 SR 3.3.1.1.14 SR 3.3.1.1.15	≤ [10]% closed
9. Turbine Control Valve Fast Closure, Trip Oil Pressure - Low	≥ [30]% RTP	[2]	E	SR 3.3.1.1.10 - 7 [SR 3.3.1.1.10] - 8 SR 3.3.1.1.11 SR 3.3.1.1.13 SR 3.3.1.1.14 SR 3.3.1.1.15	≥ [600] psig
10. Reactor Mode Switch - Shutdown Position	1,2	[2]	G	SR 3.3.1.1.12 - 10 SR 3.3.1.1.13 - 13	NA
	5(a)	[2]	H	SR 3.3.1.1.12 - 10 SR 3.3.1.1.13 - 13	NA
11. Manual Scram	1,2	[2]	G	SR 3.3.1.1.5 SR 3.3.1.1.13 - 13	NA
	5(a)	[2]	H	SR 3.3.1.1.5 SR 3.3.1.1.13 - 13	NA

(a) With any control rod withdrawn from a core cell containing one or more fuel assemblies.

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SURVEILLANCE  
REQUIREMENTS  
(continued)

As noted at the beginning of the SRs, the SRs for each RPS instrumentation Function are located in the SRs column of Table 3.3.1.1-1.

The Surveillances are modified by a Note to indicate that when a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours, provided the associated Function maintains RPS trip capability. Upon completion of the Surveillance, or expiration of the 6 hour allowance, the channel must be returned to OPERABLE status or the applicable Condition entered and Required Actions taken. This Note is based on the reliability analysis (Ref. 3) assumption of the average time required to perform channel Surveillance. That analysis demonstrated that the 6 hour testing allowance does not significantly reduce the probability that the RPS will trip when necessary.

SR 3.3.1.1.1

Performance of the CHANNEL CHECK once every 12 hours ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between instrument channels could be an indication of excessive instrument drift in one of the channels or something even more serious. A CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying the instrumentation continues to operate properly between each CHANNEL CALIBRATION.

Agreement criteria are determined by the plant staff based on a combination of the channel instrument uncertainties, including indication and readability. If a channel is outside the criteria, it may be an indication that the instrument has drifted outside its limit.

Insert 4 →

The Frequency is based upon operating experience that demonstrates channel failure is rare. The CHANNEL CHECK supplements less formal, but more frequent, checks of

(continued)

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SURVEILLANCE  
REQUIREMENTS

SR 3.3.1.1.1 (continued)

channels during normal operational use of the displays associated with the channels required by the LCO.

SR 3.3.1.1.2

To ensure that the APRMs are accurately indicating the true core average power, the APRMs are calibrated to the reactor power calculated from a heat balance. LCO 3.2.4, "Average Power Range Monitor (APRM) Gain and Setpoints," allows the APRMs to be reading greater than actual THERMAL POWER to compensate for localized power peaking. When this adjustment is made, the requirement for the APRMs to indicate within 2% RTP of calculated power is modified to require the APRMs to indicate within 2% RTP of calculated MFLPD. The Frequency of once per 7 days is based on minor changes in LPRM sensitivity, which could affect the APRM reading between performances of SR 3.3.1.1.⑥ ← ⑥

A restriction to satisfying this SR when < 25% RTP is provided that requires the SR to be met only at ≥ 25% RTP because it is difficult to accurately maintain APRM indication of core THERMAL POWER consistent with a heat balance when < 25% RTP. At low power levels, a high degree of accuracy is unnecessary because of the large, inherent margin to thermal limits (MCPR and APLHGR). At ≥ 25% RTP, the Surveillance is required to have been satisfactorily performed within the last 7 days, in accordance with SR 3.0.2. A Note is provided which allows an increase in THERMAL POWER above 25% if the 7 day Frequency is not met per SR 3.0.2. In this event, the SR must be performed within 12 hours after reaching or exceeding 25% RTP. Twelve hours is based on operating experience and in consideration of providing a reasonable time in which to complete the SR.

SR 3.3.1.1.3

The Average Power Range Monitor Flow Biased Simulated Thermal Power—High Function uses the recirculation loop drive flows to vary the trip setpoint. This SR ensures that the total loop drive flow signals from the flow units used to vary the setpoint is appropriately compared to a calibrated flow signal and, therefore, the APRM Function

(continued)

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SURVEILLANCE  
REQUIREMENTS

SR 3.3.1.1.5 (continued)

Frequency and is based on the reliability analysis of Reference 10. (The Manual Scram Function's CHANNEL FUNCTIONAL TEST Frequency was credited in the analysis to extend many automatic scram Functions' Frequencies.)

SR 3.3.1.1.6 and SR 3.3.1.1.7

These Surveillances are established to ensure that no gaps in neutron flux indication exist from subcritical to power operation for monitoring core reactivity status.

The overlap between SRMs and IRMs is required to be demonstrated to ensure that reactor power will not be increased into a neutron flux region without adequate indication. This is required prior to withdrawing SRMs from the fully inserted position since indication is being transitioned from the SRMs to the IRMs.

The overlap between IRMs and APRMs is of concern when reducing power into the IRM range. On power increases, the system design will prevent further increases (by initiating a rod block) if adequate overlap is not maintained. Overlap between IRMs and APRMs exists when sufficient IRMs and APRMs concurrently have onscale readings such that the transition between MODE 1 and MODE 2 can be made without either APRM downscale rod block, or IRM upscale rod block. Overlap between SRMs and IRMs similarly exists when, prior to withdrawing the SRMs from the fully inserted position, IRMs are above mid-scale on range 1 before SRMs have reached the upscale rod block.

As noted, SR 3.3.1.1.7 is only required to be met during entry into MODE 2 from MODE 1. That is, after the overlap requirement has been met and indication has transitioned to the IRMs, maintaining overlap is not required (APRMs may be reading downscale once in MODE 2).

If overlap for a group of channels is not demonstrated (e.g., IRM/APRM overlap), the reason for the failure of the Surveillance should be determined and the appropriate channel(s) declared inoperable. Only those appropriate channels that are required in the current MODE or condition should be declared inoperable.

(continued)

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SURVEILLANCE  
REQUIREMENTS

SR 3.3.1.1.6 and SR 3.3.1.1.7 (continued)

A Frequency of 7 days is reasonable based on engineering judgment and the reliability of the IRMs and APRMs.

SR 3.3.1.1.8 (6)

LPRM gain settings are determined from the local flux profiles measured by the Traversing Incore Probe (TIP) System. This establishes the relative local flux profile for appropriate representative input to the APRM System. The 1000 MWD/T Frequency is based on operating experience with LPRM sensitivity changes.

SR 3.3.1.1.9 (7) and SR 3.3.1.1.10 (11)

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology. The 92 day Frequency of SR 3.3.1.1.9 is based on the reliability analysis of Reference 9. (7)

The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown that these components usually pass the Surveillance when performed at the 18 month Frequency.

SR 3.3.1.1.10 (8)

Calibration of trip units provides a check of the actual trip setpoints. The channel must be declared inoperable if the trip setting is discovered to be less conservative than the Allowable Value specified in Table 3.3.1.1-1. If the trip setting is discovered to be less conservative than accounted for in the appropriate setpoint methodology, but is not beyond the Allowable Value, the channel performance is still within the requirements of the plant safety analysis. Under these conditions, the setpoint must be

(continued)

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SURVEILLANCE  
REQUIREMENTS

SR 3.3.1.1.10<sup>⑧</sup> (continued)

readjusted to be equal to or more conservative than accounted for in the appropriate setpoint methodology.

The Frequency of 92 days is based on the reliability analysis of Reference 9.

SR 3.3.1.1.11<sup>⑨</sup> and SR 3.3.1.1.13<sup>⑪</sup>

A CHANNEL CALIBRATION is a complete check of the instrument loop and the sensor. This test verifies that the channel responds to the measured parameter within the necessary range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations consistent with the plant specific setpoint methodology.

Note 1 states that neutron detectors are excluded from CHANNEL CALIBRATION because they are passive devices, with minimal drift, and because of the difficulty of simulating a meaningful signal. Changes in neutron detector sensitivity are compensated for by performing the 7 day calorimetric calibration (SR 3.3.1.1.2) and the 1000 MWD/T LPRM calibration against the TIPS (SR 3.3.1.1.6)<sup>⑥</sup>. A second Note is provided that requires the APRM and IRM SRs to be performed within 12 hours of entering MODE 2 from MODE 1. Testing of the MODE 2 APRM and IRM Functions cannot be performed in MODE 1 without utilizing jumpers, lifted leads, or movable links. This Note allows entry into MODE 2 from MODE 1 if the associated Frequency is not met per SR 3.0.2. Twelve hours is based on operating experience and in consideration of providing a reasonable time in which to complete the SR.

The Frequency of SR 3.3.1.1.11<sup>⑨</sup> is based upon the assumption of a 184 day calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis. The Frequency of SR 3.3.1.1.13<sup>⑪</sup> is based upon the assumption of an 18 month calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis.

(continued)

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SURVEILLANCE  
REQUIREMENTS  
(continued)SR 3.3.1.1.14 (12)

The Average Power Range Monitor Flow Biased Simulated Thermal Power—High Function uses an electronic filter circuit to generate a signal proportional to the core THERMAL POWER from the APRM neutron flux signal. This filter circuit is representative of the fuel heat transfer dynamics that produce the relationship between the neutron flux and the core THERMAL POWER. The Surveillance filter time constant must be verified to be  $\leq 7$  seconds to ensure that the channel is accurately reflecting the desired parameter.

The Frequency of 18 months is based on engineering judgment considering the reliability of the components.

SR 3.3.1.1.15 (13)

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required trip logic for a specific channel. The functional testing of control rods (LCO 3.1.3), and SDV vent and drain valves (LCO 3.1.8), overlaps this Surveillance to provide complete testing of the assumed safety function.

The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown that these components usually pass the Surveillance when performed at the 18 month Frequency.

SR 3.3.1.1.16 (14)

This SR ensures that scrams initiated from the Turbine Stop Valve—Closure and Turbine Control Valve Fast Closure, Trip Oil Pressure—Low Functions will not be inadvertently bypassed when THERMAL POWER is  $\geq 30\%$  RTP. This involves calibration of the bypass channels. Adequate margins for the instrument setpoint methodologies are incorporated into the actual setpoint. Because main turbine bypass flow can affect this setpoint nonconservatively (THERMAL POWER is derived from turbine first stage pressure), the main turbine

(continued)

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BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.3.1.1.18 (14) (continued)

bypass valves must remain closed at THERMAL POWER  $\geq$  30% RTP to ensure that the calibration remains valid.

If any bypass channel's setpoint is nonconservative (i.e., the Functions are bypassed at  $\geq$  30% RTP, either due to open main turbine bypass valve(s) or other reasons), then the affected Turbine Stop Valve—Closure and Turbine Control Valve Fast Closure, Trip Oil Pressure—Low Functions are considered inoperable. Alternatively, the bypass channel can be placed in the conservative condition (nonbypass). If placed in the nonbypass condition, this SR is met and the channel is considered OPERABLE.

The Frequency of 18 months is based on engineering judgment and reliability of the components.

SR 3.3.1.1.17 (15)

This SR ensures that the individual channel response times are less than or equal to the maximum values assumed in the accident analysis. This test may be performed in one measurement or in overlapping segments, with verification that all components are tested. The RPS RESPONSE TIME acceptance criteria are included in Reference 10.

As noted, neutron detectors are excluded from RPS RESPONSE TIME testing because the principles of detector operation virtually ensure an instantaneous response time.

RPS RESPONSE TIME tests are conducted on an 18 month STAGGERED TEST BASIS. Note 2 requires STAGGERED TEST BASIS Frequency to be determined based on 4 channels per trip system, in lieu of the 8 channels specified in Table 3.3.1.1-1 for the MSIV Closure Function. This Frequency is based on the logic interrelationships of the various channels required to produce an RPS scram signal. The 18 month Frequency is consistent with the typical industry refueling cycle and is based upon plant operating experience, which shows that random failures of instrumentation components causing serious response time degradation, but not channel failure, are infrequent occurrences.

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(continued)

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## B 3.3 INSTRUMENTATION

### B 3.3.1.2 Source Range Monitor (SRM) Instrumentation

#### BASES

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#### BACKGROUND

The SRMs provide the operator with information relative to the neutron flux level at very low flux levels in the core. As such, the SRM indication is used by the operator to monitor the approach to criticality and determine when criticality is achieved. The SRMs are maintained fully inserted until the count rate is greater than a minimum allowed count rate (a control rod block is set at this condition). After SRM to intermediate range monitor (IRM) overlap is demonstrated (as required by SR 3.3.1.1.6), the SRMs are normally fully withdrawn from the core. ①

The SRM subsystem of the Neutron Monitoring System (NMS) consists of four channels. Each of the SRM channels can be bypassed, but only one at any given time, by the operation of a bypass switch. Each channel includes one detector that can be physically positioned in the core. Each detector assembly consists of a miniature fission chamber with associated cabling, signal conditioning equipment, and electronics associated with the various SRM functions. The signal conditioning equipment converts the current pulses from the fission chamber to analog DC currents that correspond to the count rate. Each channel also includes indication, alarm, and control rod blocks. However, this LCO specifies OPERABILITY requirements only for the monitoring and indication functions of the SRMs.

During refueling, shutdown, and low power operations, the primary indication of neutron flux levels is provided by the SRMs or special movable detectors connected to the normal SRM circuits. The SRMs provide monitoring of reactivity changes during fuel or control rod movement and give the control room operator early indication of unexpected subcritical multiplication that could be indicative of an approach to criticality.

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#### APPLICABLE SAFETY ANALYSES

Prevention and mitigation of prompt reactivity excursions during refueling and low power operation is provided by LCO 3.9.1, "Refueling Equipment Interlocks"; LCO 3.1.1, "SHUTDOWN MARGIN (SDM)"; LCO 3.3.1.1, "Reactor Protection

(continued)

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ACTIONS

A.1 and B.1 (continued)

Provided at least one SRM remains OPERABLE, Required Action A.1 allows 4 hours to restore the required SRMs to OPERABLE status. This time is reasonable because there is adequate capability remaining to monitor the core, there is limited risk of an event during this time, and there is sufficient time to take corrective actions to restore the required SRMs to OPERABLE status or to establish alternate IRM monitoring capability. During this time, control rod withdrawal and power increase is not precluded by this Required Action. Having the ability to monitor the core with at least one SRM, proceeding to IRM Range 3 or greater (with overlap required by SR 3.3.1.1.6), and thereby exiting the Applicability of this LCO, is acceptable for ensuring adequate core monitoring and allowing continued operation. ①

Verified

With three required SRMs inoperable, Required Action B.1 allows no positive changes in reactivity (control rod withdrawal must be immediately suspended) due to inability to monitor the changes. Required Action A.1 still applies and allows 4 hours to restore monitoring capability prior to requiring control rod insertion. This allowance is based on the limited risk of an event during this time, provided that no control rod withdrawals are allowed, and the desire to concentrate efforts on repair, rather than to immediately shut down, with no SRMs OPERABLE.

C.1

In MODE 2, if the required number of SRMs is not restored to OPERABLE status within the allowed Completion Time, the reactor shall be placed in MODE 3. With all control rods fully inserted, the core is in its least reactive state with the most margin to criticality. The allowed Completion Time of 12 hours is reasonable, based on operating experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging plant systems.

D.1 and D.2

With one or more required SRMs inoperable in MODE 3 or 4, the neutron flux monitoring capability is degraded or nonexistent. The requirement to fully insert all insertable

(continued)

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SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
SR 3.3.1.1.5 Perform CHANNEL FUNCTIONAL TEST.	7 days
<del>SR 3.3.1.1.6 Verify the source range monitor (SRM) and intermediate range monitor (IRM) channels overlap.</del>	<del>Prior to withdrawing SRMs from the fully inserted position</del>
<del>SR 3.3.1.1.7</del> <p style="text-align: center;">-----NOTE----- Only required to be met during entry into MODE 2 from MODE 1. -----</p> <del>Verify the IRM and APRM channels overlap.</del>	7 days
SR 3.3.1.1.8 <sup>6</sup> Calibrate the local power range monitors.	1000 MWD/T average core exposure
SR 3.3.1.1.9 <sup>7</sup> Perform CHANNEL FUNCTIONAL TEST.	[92] days
[ SR 3.3.1.1.10 <sup>8</sup> Calibrate the trip units. ]	[ 92] days ]

(continued)

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SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.3.1.1.11<sup>(11)</sup> -----NOTES-----            1. Neutron detectors are excluded.            2. For function 2.a, not required to be performed when entering MODE 2 from MODE 1 until 12 hours after entering MODE 2.            -----            Perform CHANNEL CALIBRATION.</p>	184 days
<p>SR 3.3.1.1.12<sup>(12)</sup> Perform CHANNEL FUNCTIONAL TEST.</p>	[18] months
<p>SR 3.3.1.1.13<sup>(13)</sup> -----NOTES-----            1. Neutron detectors are excluded.            2. For function 1, not required to be performed when entering MODE 2 from MODE 1 until 12 hours after entering MODE 2.            -----            Perform CHANNEL CALIBRATION.</p>	[18] months
<p>SR 3.3.1.1.14<sup>(14)</sup> Verify the APRM Flow Biased Simulated Thermal Power—High time constant is <math>\leq</math> [7] seconds.</p>	[18] months
<p>SR 3.3.1.1.15<sup>(15)</sup> Perform LOGIC SYSTEM FUNCTIONAL TEST.</p>	[18] months

(continued)

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SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
SR 3.3.1.1.16 <sup>(14)</sup> Verify Turbine Stop Valve Closure, Trip Oil Pressure—Low and Turbine Control Valve Fast Closure Trip Oil Pressure—Low Functions are not bypassed when THERMAL POWER is $\geq$ [40]% RTP.	[18] months
SR 3.3.1.1.17 <sup>(14)</sup> -----NOTES----- 1. Neutron detectors are excluded. 2. For Function 6, "n" equals 4 channels for the purpose of determining the STAGGERED TEST BASIS Frequency. ----- Verify the RPS RESPONSE TIME is within limits.	[18] months on a STAGGERED TEST BASIS

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Table 3.3.1.1-1 (page 1 of 3)  
Reactor Protection System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	CONDITIONS REFERENCED FROM REQUIRED ACTION D.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Intermediate Range Monitors					
a. Neutron Flux - High	2	[3]	H	SR 3.3.1.1.1 SR 3.3.1.1.4 <del>SR 3.3.1.1.6</del> SR 3.3.1.1.7 SR 3.3.1.1.13 SR 3.3.1.1.15	≤ [122/125] divisions of full scale - 11 - 13
	5(a)	[3]	I	SR 3.3.1.1.1 SR 3.3.1.1.5 SR 3.3.1.1.13 SR 3.3.1.1.15	≤ [122/125] divisions of full scale 13
b. Inop	2	[3]	H	SR 3.3.1.1.4 SR 3.3.1.1.15	NA - 13
	5(a)	[3]	I	SR 3.3.1.1.5 SR 3.3.1.1.15	NA - 13
2. Average Power Range Monitors					
a. Neutron Flux - High, Setdown	2	[3]	H	SR 3.3.1.1.1 SR 3.3.1.1.4 <del>SR 3.3.1.1.7</del> SR 3.3.1.1.10 SR 3.3.1.1.13 SR 3.3.1.1.15	≤ [20]% RTP - 6 - 9 - 13
b. Flow Biased Simulated Thermal Power - High	1	[3]	G	SR 3.3.1.1.1 SR 3.3.1.1.2 SR 3.3.1.1.3 SR 3.3.1.1.6 SR 3.3.1.1.7 SR 3.3.1.1.12 SR 3.3.1.1.13 SR 3.3.1.1.15	≤ [0.66 W + 67]% RTP 6 and ≤ [113]% RTP [(b)] - 9 - 12 - 13 - 15

(continued)

(a) With any control rod withdrawn from a core cell containing one or more fuel assemblies.

(b) Allowable Value is [≤ 0.66 W + 43%] RTP when reset for single loop operation per LCO 3.4.1, "Recirculation Loops Operating."

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Table 3.3.1.1-1 (page 2 of 3)  
Reactor Protection System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	CONDITIONS REFERENCED FROM REQUIRED ACTION D.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
2. Average Power Range Monitors (continued)					
c. Fixed Neutron Flux - High	1	[3]	G	SR 3.3.1.1.1 ≤ [120]% RTP SR 3.3.1.1.2 SR 3.3.1.1.6 - 6 SR 3.3.1.1.7 - 7 SR 3.3.1.1.8 - 8 SR 3.3.1.1.9 - 9 SR 3.3.1.1.10 - 10 SR 3.3.1.1.11 - 11 SR 3.3.1.1.12 - 12 SR 3.3.1.1.13 - 13 SR 3.3.1.1.14 - 14 SR 3.3.1.1.15 - 15	
d. Inop	1,2	[3]	H	SR 3.3.1.1.16 - 6NA SR 3.3.1.1.17 - 7 SR 3.3.1.1.18 - 13	
3. Reactor Vessel Steam Dome Pressure - High	1,2	[2]	H	SR 3.3.1.1.1 ≤ [1079.7] psig SR 3.3.1.1.2 - 7 [SR 3.3.1.1.10 - 8 SR 3.3.1.1.11 - 11 SR 3.3.1.1.12 - 12 SR 3.3.1.1.13 - 13 SR 3.3.1.1.14 - 14 SR 3.3.1.1.15 - 15	
4. Reactor Vessel Water Level - Low, Level 3	1,2	[2]	H	SR 3.3.1.1.1 ≥ [10.8] inches SR 3.3.1.1.2 - 7 [SR 3.3.1.1.10 - 8 SR 3.3.1.1.11 - 11 SR 3.3.1.1.12 - 12 SR 3.3.1.1.13 - 13 SR 3.3.1.1.14 - 14 SR 3.3.1.1.15 - 15	
5. Reactor Vessel Water Level - High, Level 8	≥ 25% RTP	[2]	G	SR 3.3.1.1.1 ≤ [54.1] inches SR 3.3.1.1.2 - 7 [SR 3.3.1.1.10 - 8 SR 3.3.1.1.11 - 11 SR 3.3.1.1.12 - 12 SR 3.3.1.1.13 - 13 SR 3.3.1.1.14 - 14 SR 3.3.1.1.15 - 15	
6. Main Steam Isolation Valve - Closure	1	[8]	G	SR 3.3.1.1.9 ≤ [7]% closed SR 3.3.1.1.10 - 11 SR 3.3.1.1.11 - 11 SR 3.3.1.1.12 - 12 SR 3.3.1.1.13 - 13 SR 3.3.1.1.14 - 14 SR 3.3.1.1.15 - 15	
7. Drywell Pressure - High	1,2	[2]	H	SR 3.3.1.1.1 ≤ [1.43] psig SR 3.3.1.1.2 - 7 [SR 3.3.1.1.10 - 8 SR 3.3.1.1.11 - 11 SR 3.3.1.1.12 - 12 SR 3.3.1.1.13 - 13 SR 3.3.1.1.14 - 14 SR 3.3.1.1.15 - 15	

(continued)

Table 3.3.1.1-1 (page 3 of 3)  
Reactor Protection System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	CONDITIONS REFERENCED FROM REQUIRED ACTION D.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
8. Scram Discharge Volume Water Level - High					
a. Transmitter/Trip Unit	1,2	[2]	H	SR 3.3.1.1.1 ≤ [63]% of full SR 3.3.1.1.9-7 scale [SR 3.3.1.1.10-8 SR 3.3.1.1.13-11 SR 3.3.1.1.15-13	
	5(a)	[2]	I	SR 3.3.1.1.1 ≤ [63]% of full SR 3.3.1.1.9-7 scale [SR 3.3.1.1.10-8 SR 3.3.1.1.13-11 SR 3.3.1.1.15-13	
b. Float Switch	1,2	[2]	H	SR 3.3.1.1.8-7 ≤ [65] inches SR 3.3.1.1.13-11 SR 3.3.1.1.15-13	
	5(a)	[2]	I	SR 3.3.1.1.8-7 ≤ [65] inches SR 3.3.1.1.13-11 SR 3.3.1.1.15-13	
9. Turbine Stop Valve Closure, Trip Oil Pressure - Low	≥ [40]% RTP	[4]	E	SR 3.3.1.1.9-7 ≥ [37] psig [SR 3.3.1.1.10-8 SR 3.3.1.1.13-11 SR 3.3.1.1.15-13 SR 3.3.1.1.16-14 SR 3.3.1.1.17-15	
10. Turbine Control Valve Fast Closure, Trip Oil Pressure - Low	≥ [40]% RTP	[2]	E	SR 3.3.1.1.9-7 ≥ [42] psig [SR 3.3.1.1.10-8 SR 3.3.1.1.13-11 SR 3.3.1.1.15-13 SR 3.3.1.1.16-14 SR 3.3.1.1.17-15	
11. Reactor Mode Switch - Shutdown Position	1,2	[2]	H	SR 3.3.1.1.12-10NA SR 3.3.1.1.13-13	
	5(a)	[2]	I	SR 3.3.1.1.13-10NA SR 3.3.1.1.13-13	
12. Manual Scram	1,2	[2]	H	SR 3.3.1.1.5 NA SR 3.3.1.1.13-13	
	5(a)	[2]	I	SR 3.3.1.1.5 NA SR 3.3.1.1.13-13	

(a) With any control rod withdrawn from a core cell containing one or more fuel assemblies.

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SURVEILLANCE  
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Insert 4

SR 3.3.1.1.1 (continued)

The Frequency is based upon operating experience that demonstrates channel failure is rare. The CHANNEL CHECK supplements less formal, but more frequent, checks of channels during normal operational use of the displays associated with the channels required by the LCO.

SR 3.3.1.1.2

To ensure that the APRMs are accurately indicating the true core average power, the APRMs are calibrated to the reactor power calculated from a heat balance. LCO 3.2.4, "Average Power Range Monitor (APRM) Gain and Setpoints," allows the APRMs to be reading greater than actual THERMAL POWER to compensate for localized power peaking. When this adjustment is made, the requirement for the APRMs to indicate within 2% RTP of calculated power is modified to require the APRMs to indicate within 2% RTP of calculated MFLPD. The Frequency of once per 7 days is based on minor changes in LPRM sensitivity, which could affect the APRM reading between performances of SR 3.3.1.1. ~~6~~ (6)

A restriction to satisfying this SR when < 25% RTP is provided that requires the SR to be met only at ≥ 25% RTP because it is difficult to accurately maintain APRM indication of core THERMAL POWER consistent with a heat balance when < 25% RTP. At low power levels, a high degree of accuracy is unnecessary because of the large inherent margin to thermal limits (MCPR and APLHGR). At ≥ 25% RTP, the Surveillance is required to have been satisfactorily performed within the last 7 days in accordance with SR 3.0.2. A Note is provided which allows an increase in THERMAL POWER above 25% if the 7 day Frequency is not met per SR 3.0.2. In this event, the SR must be performed within 12 hours after reaching or exceeding 25% RTP. Twelve hours is based on operating experience and in consideration of providing a reasonable time in which to complete the SR.

SR 3.3.1.1.3

The Average Power Range Monitor Flow Biased Simulated Thermal Power—High Function uses the recirculation loop drive flows to vary the trip setpoint. This SR ensures that

(continued)

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SR 3.3.1.1.5 (continued)

intended Function. A Frequency of 7 days provides an acceptable level of system average availability over the Frequency and is based on the reliability analysis of Reference 9. (The Manual Scram Function's CHANNEL FUNCTIONAL TEST Frequency was credited in the analysis to extend many automatic scram Functions' Frequencies.)

SR 3.3.1.1.6 and SR 3.3.1.1.7

These Surveillances are established to ensure that no gaps in neutron flux indication exist from subcritical to power operation for monitoring core reactivity status.

The overlap between SRMs and IRMs is required to be demonstrated to ensure that reactor power will not be increased into a region without adequate neutron flux indication. This is required prior to withdrawing SRMs from the fully inserted position since indication is being transitioned from the SRMs to the IRMs.

The overlap between IRMs and APRMs is of concern when reducing power into the IRM range. On power increases, the system design will prevent further increases (initiate a rod block) if adequate overlap is not maintained. Overlap between IRMs and APRMs exists when sufficient IRMs and APRMs concurrently have onscale readings such that the transition between MODE 1 and MODE 2 can be made without either APRM downscale rod block, or IRM upscale rod block. Overlap between SRMs and IRMs similarly exists when, prior to withdrawing the SRMs from the fully inserted position, IRMs are above mid-scale on range 1 before SRMs have reached the upscale rod block.

As noted, SR 3.3.1.1.7 is only required to be met during entry into MODE 2 from MODE 1. That is, after the overlap requirement has been met and indication has transitioned to the IRMs, maintaining overlap is not required (APRMs may be reading downscale once in MODE 2).

If overlap for a group of channels is not demonstrated (e.g., IRM/APRM overlap), the reason for the failure of the Surveillance should be determined and the appropriate channel(s) declared inoperable. Only those appropriate

(continued)

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SR 3.3.1.1.6 and SR 3.3.1.1.7 (continued)

channel(s) that are required in the current MODE or condition should be declared inoperable.

A Frequency of 7 days is reasonable based on engineering judgment and the reliability of the IRMs and APRMs.

SR 3.3.1.1.8 (6)

LPRM gain settings are determined from the local flux profiles measured by the Traversing Incore Probe (TIP) System. This establishes the relative local flux profile for appropriate representative input to the APRM System. The 1000 MWD/T Frequency is based on operating experience with LPRM sensitivity changes.

SR 3.3.1.1.9 and SR 3.3.1.1.10 (10)

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology. The 92 day Frequency of SR 3.3.1.1.9 is based on the reliability analysis of Reference 9. (7)

The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown that these components usually pass the Surveillance when performed at the 18 month Frequency.

SR 3.3.1.1.11 (8)

The calibration of trip units provides a check of the actual trip setpoints. The channel must be declared inoperable if the trip setting is discovered to be less conservative than the Allowable Value specified in Table 3.3.1.1-1. If the trip setting is discovered to be less conservative than accounted for in the appropriate setpoint methodology, but

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SR 3.3.1.1.10 (continued)

is not beyond the Allowable Value, the channel performance is still within the requirements of the plant safety analysis. Under these conditions, the setpoint must be readjusted to be equal to or more conservative than accounted for in the appropriate setpoint methodology.

The Frequency of 92 days for SR 3.3.1.1.10 is based on the reliability analysis of Reference 9.

SR 3.3.1.1.11 and SR 3.3.1.1.12

A CHANNEL CALIBRATION is a complete check of the instrument loop and the sensor. This test verifies the channel responds to the measured parameter within the necessary range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations consistent with the plant specific setpoint methodology.

Note 1 states that neutron detectors are excluded from CHANNEL CALIBRATION because of the difficulty of simulating a meaningful signal. Changes in neutron detector sensitivity are compensated for by performing the 7 day calorimetric calibration (SR 3.3.1.1.2) and the 1000 MWD/T LPRM calibration against the TIPS (SR 3.3.1.1.6). A second Note is provided that requires the APRM and IRM SRs to be performed within 12 hours of entering MODE 2 from MODE 1. Testing of the MODE 2 APRM and IRM Functions cannot be performed in MODE 1 without utilizing jumpers, lifted leads, or movable links. This Note allows entry into MODE 2 from MODE 1 if the associated Frequency is not met per SR 3.0.2. Twelve hours is based on operating experience and in consideration of providing a reasonable time in which to complete the SR. The Frequency of SR 3.3.1.1.11 is based upon the assumption of a 184 day calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis. The Frequency of SR 3.3.1.1.12 is based on the assumption of an 18 month calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis.

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(continued)

SR 3.3.1.1.14 (12)

The Average Power Range Monitor Flow Biased Simulated Thermal Power—High Function uses an electronic filter circuit to generate a signal proportional to the core THERMAL POWER from the APRM neutron flux signal. This filter circuit is representative of the fuel heat transfer dynamics that produce the relationship between the neutron flux and the core THERMAL POWER. The filter time constant must be verified to ensure that the channel is accurately reflecting the desired parameter.

The Frequency of 18 months is based on engineering judgment and reliability of the components.

SR 3.3.1.1.15 (13)

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required trip logic for a specific channel. The functional testing of control rods, in LCO 3.1.3, "Control Rod OPERABILITY," and SDV vent and drain valves, in LCO 3.1.8, "Scram Discharge Volume (SDV) Vent and Drain Valves," overlaps this Surveillance to provide complete testing of the assumed safety function.

The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown that these components usually pass the Surveillance when performed at the 18 month Frequency.

SR 3.3.1.1.16 (14)

This SR ensures that scrams initiated from the Turbine Stop Valve Closure, Trip Oil Pressure—Low and Turbine Control Valve Fast Closure, Trip Oil Pressure—Low Functions will not be inadvertently bypassed when THERMAL POWER is  $\geq 40\%$  RTP. This involves calibration of the bypass channels. Adequate margins for the instrument setpoint methodology are incorporated into the actual setpoint. Because main turbine bypass flow can affect this setpoint nonconservatively (THERMAL POWER is derived from turbine

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BASES

SURVEILLANCE  
REQUIREMENTS

SR 3.3.1.1.16 (14) (continued)

first stage pressure), the main turbine bypass valves must remain closed at THERMAL POWER  $\geq$  40% RTP to ensure that the calibration remains valid.

If any bypass channel setpoint is nonconservative (i.e., the Functions are bypassed at  $\geq$  40% RTP, either due to open main turbine bypass valve(s) or other reasons), then the affected Turbine Stop Valve, Trip Oil Pressure—Low and Turbine Control Valve Fast Closure, Trip Oil Pressure—Low Functions are considered inoperable. Alternatively, the bypass channel can be placed in the conservative condition (nonbypass). If placed in the nonbypass condition, this SR is met and the channel is considered OPERABLE.

The Frequency of 18 months is based on engineering judgment and reliability of the components.

SR 3.3.1.1.17 (15)

This SR ensures that the individual channel response times are less than or equal to the maximum values assumed in the accident analysis. The RPS RESPONSE TIME acceptance criteria are included in Reference [ ].

As noted, neutron detectors are excluded from RPS RESPONSE TIME testing because the principles of detector operation virtually ensure an instantaneous response time.

RPS RESPONSE TIME tests are conducted on an 18 month STAGGERED TEST BASIS. Note 2 requires STAGGERED TEST BASIS Frequency to be determined based on 4 channels per trip system, in lieu of the 8 channels specified in Table 3.3.1.1-1 for the MSIV Closure Function. This Frequency is based on the logic interrelationships of the various channels required to produce an RPS scram signal. Therefore, staggered testing results in response time verification of these devices every 18 months. The 18 month Frequency is consistent with the typical industry refueling cycle and is based upon plant operating experience, which shows that random failures of instrumentation components causing serious time degradation, but not channel failure, are infrequent.

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B 3.3 INSTRUMENTATION

B 3.3.1.2 Source Range Monitor (SRM) Instrumentation

BASES

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BACKGROUND

The SRMs provide the operator with information relative to the neutron level at very low flux levels in the core. As such, the SRM indication is used by the operator to monitor the approach to criticality and to determine when criticality is achieved. The SRMs are maintained fully inserted until the count rate is greater than a minimum allowed count rate (a control rod block is set at this condition). After SRM to intermediate range monitor (IRM) overlap is demonstrated (as required by SR 3.3.1.1.8), the SRMs are normally fully withdrawn from the core. ①

The SRM subsystem of the Neutron Monitoring System (NMS) consists of five channels. Each of the SRM channels can be bypassed, but only one at any given time, by the operation of a bypass switch. Each channel includes one detector that can be physically positioned in the core. Each detector assembly consists of a miniature fission chamber with associated cabling, signal conditioning equipment, and electronics associated with the various SRM functions. The signal conditioning equipment converts the current pulses from the fission chamber to analog DC currents that correspond to the count rate. Each channel also includes indication, alarm, and control rod blocks. However, this LCO specifies OPERABILITY requirements only for the monitoring and indication functions of the SRMs.

During refueling, shutdown, and low power operations, the primary indication of neutron flux levels is provided by the SRMs or special movable detectors connected to the normal SRM circuits. The SRMs provide monitoring of reactivity changes during fuel or control rod movement and give the control room operator early indication of unexpected subcritical multiplication that could be indicative of an approach to criticality.

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APPLICABLE  
SAFETY ANALYSES

Prevention and mitigation of prompt reactivity excursions during refueling and low power operation are provided by LCO 3.9.1, "Refueling Equipment Interlocks"; LCO 3.1.1, "SHUTDOWN MARGIN (SDM)"; LCO 3.3.1.1, "Reactor Protection

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## BASES

## ACTIONS

A.1 and B.1 (continued)

adequate capability remaining to monitor the core, limited risk of an event during this time, and sufficient time to take corrective actions to restore the required SRMs to OPERABLE status or to establish alternate IRM monitoring capability. During this time, control rod withdrawal and power increase are not precluded by this Required Action. Having the ability to monitor the core with at least one SRM, proceeding to IRM Range 3 or greater (with overlap required by SR 3.3.1.1 (6) and thereby exiting the Applicability of this LCO, is acceptable for ensuring adequate core monitoring and allowing continued operation. (1)

Verified

With four required SRMs inoperable, Required Action B.1 allows no positive changes in reactivity (control rod withdrawal must be immediately suspended) due to the inability to monitor the changes. Required Action A.1 still applies and allows 4 hours to restore monitoring capability prior to requiring control rod insertion. This allowance is based on the limited risk of an event during this time, provided that no control rod withdrawals are allowed, and the desire to concentrate efforts on repair, rather than to immediately shut down, with no SRMs OPERABLE.

C.1

In MODE 2, if the required number of SRMs is not restored to OPERABLE status within the allowed Completion Time, the reactor shall be placed in MODE 3. With all control rods fully inserted, the core is in its least reactive state with the most margin to criticality. The allowed Completion Time of 12 hours is reasonable, based on operating experience, to reach MODE 3 in an orderly manner and without challenging plant systems.

D.1 and D.2

With one or more required SRM channels inoperable in MODE 3 or 4, the neutron flux monitoring capability is degraded or nonexistent. The requirement to fully insert all insertable control rods ensures that the reactor will be at its minimum reactivity level while no neutron monitoring capability is available. Placing the reactor mode switch in the shutdown

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