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## 2.0 SAFETY LIMITS AND LIMITING SAFETY SYSTEM SETTINGS

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### 2.1 SAFETY LIMITS (SLs)

#### 2.1.1 REACTOR CORE SLs

In MODES 1 and 2, the combination of THERMAL POWER, Reactor Coolant System (RCS) highest loop average temperature, and pressurizer pressure shall not exceed the limits specified in the COLR; and the following SLs shall not be exceeded:

2.1.1.1 The departure from nucleate boiling ratio (DNBR) shall be maintained greater than or equal to 1.17 for the WRB-1/WRB-2/WRB-2M DNB correlations.

2.1.1.2 The peak fuel centerline temperature shall be maintained less than 5080°F, decreasing by 58°F per 10,000 MWD/MTU of burnup.

#### 2.1.2 REACTOR COOLANT SYSTEM PRESSURE SL

In MODES 1, 2, 3, 4, and 5, the RCS pressure shall be maintained less than or equal to 2735 psig.

#### 2.1.3 SAFETY LIMIT VIOLATIONS

2.1.3.1 If SL 2.1.1 is violated, restore compliance and be in MODE 3 within 1 hour.

2.1.3.2 If SL 2.1.2 is violated:

- a. In MODE 1 or 2, restore compliance and be in MODE 3 within 1 hour.
- b. In MODE 3, 4, or 5, restore compliance within 5 minutes.

Figure 2.1-1 (THIS FIGURE IS NOT USED)

## 2.1 SAFETY LIMITS (SLs)

### BASES

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#### 2.1.1 Reactor Core SLs

##### BACKGROUND

GDC 10 (Ref. 1) requires that specified acceptable fuel design limits are not exceeded during steady state operation, normal operational transients, and anticipated operational occurrences (AOOs). This is accomplished by having a departure from nucleate boiling (DNB) design basis, which corresponds to a 95% probability at a 95% confidence level (the 95/95 DNB criterion) that DNB will not occur and by requiring that fuel centerline temperature stays below the melting temperature.

The restrictions of this SL prevent overheating of the fuel and cladding, as well as possible cladding perforation, that would result in the release of fission products to the reactor coolant. Overheating of the fuel is prevented by maintaining the steady state peak linear heat rate (LHR) below the level at which fuel centerline melting occurs. Overheating of the fuel cladding is prevented by restricting fuel operation to within the nucleate boiling regime, where the heat transfer coefficient is large and the cladding surface temperature is slightly above the coolant saturation temperature.

Fuel centerline melting occurs when the local LHR, or power peaking, in a region of the fuel is high enough to cause the fuel centerline temperature to reach the melting point of the fuel. Expansion of the pellet upon centerline melting may cause the pellet to stress the cladding to the point of failure, allowing an uncontrolled release of activity to the reactor coolant.

Operation above the boundary of the nucleate boiling regime could result in excessive cladding temperature because of the onset of DNB and the resultant sharp reduction in heat transfer coefficient. Inside the steam film, high cladding temperatures are reached, and a cladding water (zirconium water) reaction may take place. This chemical reaction results in oxidation of the fuel cladding to a structurally weaker form. This weaker form may lose its integrity, resulting in an uncontrolled release of activity to the reactor coolant.

The proper functioning of the Reactor Protection System (RPS) and steam generator safety valves prevents violation of the reactor core SLs.

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##### APPLICABLE SAFETY ANALYSES

The fuel cladding must not sustain damage as a result of normal operation and AOOs. The reactor core SLs are established to preclude violation of the following fuel design criteria:

- a. There must be at least 95% probability at a 95% confidence level (the 95/95 DNB criterion) that the hot fuel rod in the core does not experience DNB and
- b. The hot fuel pellet in the core must not experience centerline fuel melting.

The Reactor Trip System setpoints (Ref. 2), in combination with all the LCOs, are designed to prevent any anticipated combination of transient conditions for Reactor Coolant System (RCS) temperature, pressure, RCS Flow,  $\Delta I$ , and THERMAL POWER level that would result in a departure from nucleate boiling ratio (DNBR) of less than the DNBR limit and preclude the existence of flow instabilities.

Automatic enforcement of these reactor core SLs is provided by the appropriate operation of the RPS and the steam generator safety valves.

## 2.1 SAFETY LIMITS (SLs)

### BASES

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#### 2.1.1 Reactor Core SLs (continued)

The SLs represent a design requirement for establishing the RPS trip setpoints identified previously. Specification 3/4.2.5, "DNB Parameters," or the assumed initial conditions of the safety analyses (as indicated in the UFSAR, Ref. 2) provide more restrictive limits to ensure that the SLs are not exceeded.

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### SAFETY LIMITS

The figure provided in the COLR shows the loci of points of THERMAL POWER, RCS pressure, and average temperature for which the minimum DNBR is not less than the safety analyses limit, that fuel centerline temperature remains below melting, that the average enthalpy in the hot leg is less than or equal to the enthalpy of saturated liquid, or that the exit quality is within the limits defined by the DNBR correlation.

The reactor core SLs are established to preclude violation of the following fuel design criteria:

- a. There must be at least a 95% probability at a 95% confidence level (the 95/95 DNB criterion) that the hot fuel rod in the core does not experience DNB and
- b. There must be at least a 95% probability at a 95% confidence level that the hot fuel pellet in the core does not experience centerline fuel melting.

The reactor core SLs are used to define the various RPS functions such that the above criteria are satisfied during steady state operation, normal operational transients, and anticipated operational occurrences (AOOs). To ensure that the RPS precludes the violation of the above criteria, additional criteria are applied to the Overtemperature and Overpower  $\Delta T$  reactor trip functions. That is, it must be demonstrated that the average enthalpy in the hot leg is less than or equal to the saturation enthalpy and the core exit quality is within the limits defined by the DNBR correlation. Appropriate functioning of the RPS ensures that for variations in the THERMAL POWER, RCS Pressure, RCS average temperature, RCS flow rate, and  $\Delta I$  that the reactor core SLs will be satisfied during steady state operation, normal operational transients, and AOOs.

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### APPLICABILITY

SL 2.1.1 only applies in MODES 1 and 2 because these are the only MODES in which the reactor is critical. Automatic protection functions are required to be OPERABLE during MODES 1 and 2 to ensure operation within the reactor core SLs. The steam generator safety valves or automatic protection actions serve to prevent RCS heatup to the reactor core SL conditions or to initiate a reactor trip function, which forces the unit into MODE 3. Setpoints for the reactor trip functions are specified in Specification 3/4.3.1, "Reactor Trip System (RTS) Instrumentation." In MODES 3, 4, 5, and 6, Applicability is not required since the reactor is not generating significant THERMAL POWER.

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## 2.1 SAFETY LIMITS (SLs)

### BASES

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#### 2.1.2 Reactor Coolant System (RCS) Pressure SL

##### BACKGROUND

The SL on RCS pressure protects the integrity of the RCS against overpressurization. In the event of fuel cladding failure, fission products are released into the reactor coolant. The RCS then serves as the primary barrier in preventing the release of fission products into the atmosphere. By establishing an upper limit on RCS pressure, the continued integrity of the RCS is ensured. According to 10 CFR 50, Appendix A, GDC 14, "Reactor Coolant Pressure Boundary," and GDC 15, "Reactor Coolant System Design" (Ref. 3), the reactor pressure coolant boundary (RCPB) design conditions are not to be exceeded during normal operation and anticipated operational occurrences (AOOs). Also, in accordance with GDC 28, "Reactivity Limits" (Ref. 3), reactivity accidents, including rod ejection, do not result in damage to the RCPB greater than limited local yielding.

The design pressure of the RCS is 2500 psia. During normal operation and AOOs, RCS pressure is limited from exceeding the design pressure by more than 10%, in accordance with Section III of the ASME Code (Ref. 4). To ensure system integrity, all RCS components are hydrostatically tested at 125% of design pressure, according to the ASME Code requirements prior to initial operation when there is no fuel in the core. Following inception of unit operation, RCS components shall be pressure tested, in accordance with the requirements of ASME Code, Section XI (Ref. 5).

Overpressurization of the RCS could result in a breach of the RCPB. If such a breach occurs in conjunction with a fuel cladding failure, fission products could enter the containment atmosphere, raising concerns relative to limits on radioactive releases specified in 10 CFR 100, "Reactor Site Criteria" (Ref. 6).

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##### APPLICABLE SAFETY ANALYSES

The RCS pressurizer safety valves, the main steam safety valves (MSSVs), and the reactor high pressure trip have settings established to ensure that the RCS pressure SL will not be exceeded.

The RCS pressurizer safety valves are sized to prevent system pressure from exceeding the design pressure by more than 10%, as specified in Section III of the ASME Code for Nuclear Power Plant Components (Ref. 3). The transient that establishes the required relief capacity, and hence valve size requirements and lift settings, is a complete loss of external load without a direct reactor trip. During the transient, no control actions are assumed, except that the safety valves on the secondary plant are assumed to open when the steam pressure reaches the secondary plant safety valve settings, and nominal feedwater supply is maintained.

The Reactor Trip System setpoints (Ref. 2), together with the settings of the MSSVs, provide pressure protection for normal operation and AOOs. The reactor high pressure trip setpoint is specifically set to provide protection against overpressurization (Ref. 2). The safety analyses for both the high pressure trip and the RCS pressurizer safety valves are performed using conservative assumptions relative to pressure control devices.

## 2.1 SAFETY LIMITS (SLs)

### BASES

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#### 2.1.2 Reactor Coolant System (RCS) Pressure SL (continued)

More specifically, no credit is taken for operation of any of the following:

- a. Pressurizer power operated relief valves (PORVs),
  - b. Steam line relief valve,
  - c. Steam Dump System,
  - d. Reactor Control System,
  - e. Pressurizer Level Control System, or
  - f. Pressurizer spray valve.
- 

### SAFETY LIMITS

The maximum transient pressure allowed in the RCS pressure vessel under the ASME Code, Section III, is 110% of design pressure. The maximum transient pressure allowed in the RCS piping, valves, and fittings under USAS, Section B31.1 (Ref. 7) is 120% of design pressure. The most limiting of these two allowances is the 110% of design pressure; therefore, the SL on maximum allowable RCS pressure is 2735 psig.

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### APPLICABILITY

SL 2.1.2 applies in MODES 1, 2, 3, 4, and 5 because this SL could be approached or exceeded in these MODES due to overpressurization events. The SL is not applicable in MODE 6 because the reactor vessel head closure bolts are not fully tightened, making it unlikely that the RCS can be pressurized.

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#### 2.1.3 SAFETY LIMIT VIOLATIONS

The following SL violation responses are applicable:

If the reactor core SL 2.1.1 is violated, the requirement to go to MODE 3 places the unit in a MODE in which this SL is not applicable. The Allowed Outage Time (Completion Time) of 1 hour recognizes the importance of bringing the unit to a MODE of operation where this SL is not applicable, and reduces the probability of fuel damage.

If the RCS pressure SL is violated when the reactor is in MODE 1 or 2, the requirement is to restore compliance and be in MODE 3 within 1 hour. Exceeding the RCS pressure SL may cause immediate RCS failure and create a potential for radioactive releases in excess of 10 CFR 100, "Reactor Site Criteria," limits (Ref. 6). The Allowed Outage Time (Completion Time) of 1 hour recognizes the importance of reducing power level to a MODE of operation where the potential for challenges to safety systems is minimized.

## 2.1 SAFETY LIMITS (SLs)

### BASES

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#### SAFETY LIMIT VIOLATIONS (continued)

If the RCS pressure SL is exceeded in MODE 3, 4, or 5, RCS pressure must be restored to within the SL value within 5 minutes. Exceeding the RCS pressure SL in MODE 3, 4, or 5 is more severe than exceeding this SL in MODE 1 or 2, since the reactor vessel temperature may be lower and the vessel material, consequently, less ductile. As such, pressure must be reduced to less than the SL within 5 minutes. The action does not require reducing MODES, since this would require reducing temperature, which would compound the problem by adding thermal gradient stresses to the existing pressure stress.

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#### REFERENCES

1. 10 CFR 50, Appendix A, GDC 10.
  2. UFSAR, Chapters 7 and 15.
  3. 10 CFR 50, Appendix A, GDC 14, GDC 15, and GDC 28.
  4. ASME, Boiler and Pressure Vessel Code, Section III, Article NB-7000.
  5. ASME, Boiler and Pressure Vessel Code, Section XI, Article IWX-5000.
  6. 10 CFR 100.
  7. USBS B31.1, Standard Code for Pressure Piping, American Society of Mechanical Engineers, 1967.
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## LIMITING SAFETY SYSTEM SETTINGS

### BASES

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#### 2.2.1 REACTOR TRIP SYSTEM INSTRUMENTATION SETPOINTS (Continued)

##### Intermediate and Source Range, Neutron Flux

The Intermediate and Source Range, Neutron Flux trips provide core protection during reactor startup to mitigate the consequences of an uncontrolled rod cluster control assembly bank withdrawal from a subcritical condition. These trips provide redundant protection to the Low Setpoint trip of the Power Range, Neutron Flux channels. The Source Range channels will initiate a Reactor trip at about  $10^5$  counts per second unless manually blocked when P-6 becomes active. The Intermediate Range channels will initiate a Reactor trip at a current level equivalent to approximately 25% of RATED THERMAL POWER unless manually blocked when P-10 becomes active.

##### Overtemperature $\Delta T$

The Overtemperature  $\Delta T$  trip provides core protection to prevent DNB for all combinations of pressure, power, coolant temperature, and axial power distribution, provided that the transient is slow with respect to piping transit delays from the core to the temperature detectors (about 4 seconds), pressure is within the range between the Pressurizer High and Low Pressure trips and power is less than the Overpower  $\Delta T$  trip setpoint. The Setpoint is automatically varied with: (1) coolant temperature to correct for temperature induced changes in density and heat capacity of water and includes dynamic compensation for piping delays from the core to the loop temperature detectors, (2) pressurizer pressure, and (3) axial power distribution. With normal axial power distribution, this Reactor trip limit is always below the core Safety Limit as shown in the COLR. If axial peaks are greater than design, as indicated by the difference between top and bottom power range nuclear detectors, the Reactor trip is automatically reduced according to the notations in Table 2.2-1.

##### Overpower $\Delta T$

The Overpower  $\Delta T$  trip provides assurance of fuel integrity (e.g., no fuel pellet melting and less than 1% cladding strain) under all possible overpower conditions, limits the required range for Overtemperature  $\Delta T$  trip, and provides a backup to the High Neutron Flux trip. The Setpoint is automatically varied with: (1) coolant temperature to correct for temperature induced changes in density and heat capacity of water, (2) rate of change of temperature for dynamic compensation for piping delays from the core to the loop temperature detectors, and (3) axial power distribution to ensure that the allowable heat generation rate (Kw/ft) is not exceeded. The Overpower  $\Delta T$  trip provides protection to mitigate the consequences of various size steam breaks as reported in WCAP-9226, "Reactor Core Response to Excessive Secondary Steam Releases."

## 3/4.1 REACTIVITY CONTROL SYSTEMS

### 3/4.1.1 BORATION CONTROL

#### SHUTDOWN MARGIN - $T_{AVG}$ GREATER THAN 200°F

#### LIMITING CONDITION FOR OPERATION

---

3.1.1.1 The SHUTDOWN MARGIN for four-loop operation shall be greater than or equal to the limit specified in the CORE OPERATING LIMITS REPORT (COLR).

APPLICABILITY: MODES 1, 2\*, 3, and 4.

#### ACTION:

With the SHUTDOWN MARGIN less than the limiting value, immediately initiate and continue boration equivalent to 30 gpm at a boron concentration greater than or equal to the limit specified in the COLR for the Boric Acid Storage System until the required SHUTDOWN MARGIN is restored.

#### SURVEILLANCE REQUIREMENTS

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4.1.1.1.1 The SHUTDOWN MARGIN shall be determined to be greater than or equal to the limiting value:

- a. Within 1 hour after detection of an inoperable control rod(s) and at least once per 12 hours thereafter while the rod(s) is inoperable. If the inoperable control rod is immovable or untrippable, the above required SHUTDOWN MARGIN shall be verified acceptable with an increased allowance for the withdrawn worth of the immovable or untrippable control rod(s);
- b. When in MODE 1 or MODE 2 with  $k_{eff}$  greater than or equal to 1 at least once per 12 hours by verifying that control bank withdrawal is within the limits of Specification 3.1.3.6;
- c. When in MODE 2 with  $k_{eff}$  less than 1, within 4 hours prior to achieving reactor criticality by verifying that the predicted critical control rod position is within the limits of Specification 3.1.3.6;
- d. Prior to initial operation above 5% RATED THERMAL POWER after each fuel loading, by consideration of the factors of Specification 4.1.1.1.1e below, with the control banks at the maximum insertion limit of Specification 3.1.3.6; and

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\*See Special Test Exceptions Specification 3.10.1.

## REACTIVITY CONTROL SYSTEMS

### BORATION CONTROL

#### SHUTDOWN MARGIN - T<sub>AVG</sub> LESS THAN OR EQUAL TO 200°F

#### LIMITING CONDITION FOR OPERATION

---

3.1.1.2 The SHUTDOWN MARGIN shall be greater than or equal to the limit specified in the CORE OPERATING LIMITS REPORT (COLR). Additionally, the Reactor Coolant System boron concentration shall be greater than or equal to the limit specified in the COLR when the reactor coolant loops are in a drained condition.

APPLICABILITY: MODE 5.

#### ACTION:

With the SHUTDOWN MARGIN less than the limit specified in the COLR or the Reactor Coolant System boron concentration less than the limit specified in the COLR, immediately initiate and continue boration equivalent to 30 gpm at a boron concentration greater than or equal to the limit specified in the COLR for the Boric Acid Storage System until the required SHUTDOWN MARGIN and boron concentration are restored.

#### SURVEILLANCE REQUIREMENTS

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4.1.1.2 The SHUTDOWN MARGIN shall be determined to be greater than or equal to the limit specified in the COLR and the Reactor Coolant System boron concentration shall be determined to be greater than or equal to the limit specified in the COLR when the reactor coolant loops are in a drained condition:

- a. Within 1 hour after detection of an inoperable control rod(s) and at least once per 12 hours thereafter while the rod(s) is inoperable. If the inoperable control rod is immovable or untrippable, the SHUTDOWN MARGIN shall be verified acceptable with an increased allowance for the withdrawn worth of the immovable or untrippable control rod(s); and
- b. At least once per 24 hours by consideration of the following factors:
  - 1) Reactor Coolant System boron concentration,
  - 2) Control rod position,
  - 3) Reactor Coolant System average temperature,
  - 4) Fuel burnup based on gross thermal energy generation,
  - 5) Xenon concentration, and
  - 6) Samarium concentration.

## REACTIVITY CONTROL SYSTEMS

### 3/4.1.2 BORATION SYSTEMS

#### ISOLATION OF UNBORATED WATER SOURCES - SHUTDOWN

##### LIMITING CONDITION FOR OPERATION

---

3.1.2.7 Provisions to isolate the Reactor Coolant System from unborated water sources shall be OPERABLE with:

- a. The Boron Thermal Regeneration System (BTRS) isolated from the Reactor Coolant System, and
- b. The Reactor Makeup Systems inoperable except for the capability of delivering up to the capacity of one Reactor Makeup Water pump to the Reactor Coolant System.

APPLICABILITY: MODES 4, 5, and 6

##### ACTION:

With the requirements of the above specification not satisfied immediately suspend all operations involving CORE ALTERATIONS or positive reactivity changes and, if within 1 hour the required SHUTDOWN MARGIN is not verified, initiate and continue boration equivalent to 30 gpm at a boron concentration greater than or equal to the limit specified in the COLR for the Boric Acid Storage System until the required SHUTDOWN MARGIN is restored and the isolation provisions are restored to OPERABLE.

##### SURVEILLANCE REQUIREMENTS

---

4.1.2.7 The provisions to isolate the Reactor Coolant System from unborated water sources shall be determined to be OPERABLE at least once per 31 days by:

- a. Verifying that at least the BTRS outlet valve, CS-V-302, or the BTRS moderating heat exchanger outlet valve, CS-V-305, or the manual outlet isolation valve for each demineralizer\* not saturated with boron, CS-V-284, CS-V-295, CS-V-288, CS-V-290, CS-V-291, is closed and locked closed, and
- b. Verifying that power is removed from at least one of the Reactor Makeup Water pumps, RMW-P-16A or RMW-P-16B.

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\*A demineralizer may be unisolated to saturate a bed with boron provided the effluent is not directed back to the Reactor Coolant System.

## POWER DISTRIBUTION LIMITS

### 3/4.2.5 DNB PARAMETERS

#### LIMITING CONDITION FOR OPERATION

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3.2.5 The following DNB-related parameters shall be maintained within the following limits:

- a. Reactor Coolant System  $T_{avg}$  is less than or equal to the limit specified in the COLR,
- b. Pressurizer Pressure is greater than or equal to the limit specified in the COLR\*, and
- c. Reactor Coolant System Flow shall be:
  1.  $\geq 382,800$  gpm\*\*; and,
  2.  $\geq 392,800$  gpm\*\*\*

APPLICABILITY: MODE 1.

#### ACTION:

With any of the above parameters exceeding its limit, restore the parameter to within its limit within 2 hours or reduce THERMAL POWER to less than 5% of RATED THERMAL POWER within the next 4 hours.

#### SURVEILLANCE REQUIREMENTS

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4.2.5.1 Each of the parameters shown above shall be verified to be within its limits at least once per 12 hours.

4.2.5.2 The RCS flow rate indicators shall be subjected to CHANNEL CALIBRATION at least once per 18 months.

4.2.5.3 The RCS total flow rate shall be determined by an approved method to be within its limit prior to operation above 95% of RATED THERMAL POWER after each fuel loading. The provisions of Specification 4.0.4 are not applicable for entry into MODE 1.

\* Limit not applicable during either a THERMAL POWER ramp in excess of 5% of RATED THERMAL POWER per minute or a THERMAL POWER step in excess of 10% of RATED THERMAL POWER.

\*\* Thermal Design Flow. An allowance for measurement uncertainty shall be made when comparing measured flow to Thermal Design Flow.

\*\*\* Minimum measured flow used in the Revised Thermal Design Procedure.

## 3/4.5 EMERGENCY CORE COOLING SYSTEMS

### 3/4.5.1 ACCUMULATORS

#### HOT STANDBY, STARTUP, AND POWER OPERATION

##### LIMITING CONDITION FOR OPERATION

---

3.5.1.1 Each Reactor Coolant System (RCS) accumulator shall be OPERABLE with:

- a. The isolation valve open and power removed,
- b. A contained borated water volume of between 6121 and 6596 gallons,
- c. A boron concentration of between the limits specified in the COLR, and
- d. A nitrogen cover-pressure of between 585 and 664 psig.

APPLICABILITY: MODES 1, 2, and 3\*.

##### ACTION:

- a. With one accumulator inoperable, except as a result of a closed isolation valve, restore the inoperable accumulator to OPERABLE status within 8 hours or be in at least HOT STANDBY within the next 6 hours and reduce pressurizer pressure to less than 1000 psig within the following 6 hours.
- b. With one accumulator inoperable due to the isolation valve being closed, either immediately open the isolation valve or be in at least HOT STANDBY within 6 hours and reduce pressurizer pressure to less than 1000 psig within the following 6 hours.
- c. With one pressure or water level channel inoperable per accumulator, return the inoperable channel to OPERABLE status within 30 days or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.
- d. With two pressure channels or two water level channels inoperable per accumulator, immediately declare the affected accumulator(s) inoperable.

##### SURVEILLANCE REQUIREMENTS

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4.5.1.1 Each accumulator shall be demonstrated OPERABLE:

- a. At least once per 24 hours by:
  - 1) Verifying the contained borated water volume and nitrogen cover-pressure in the tanks, and

\*Pressurizer pressure above 1000 psig.

## BORON INJECTION SYSTEM

### 3/4.5.4 REFUELING WATER STORAGE TANK

#### LIMITING CONDITION FOR OPERATION

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3.5.4 The refueling water storage tank (RWST) shall be OPERABLE with:

- a. A minimum contained borated water volume of 477,000 gallons,
- b. A boron concentration between the limits specified in the COLR,
- c. A minimum solution temperature of 50°F, and
- d. A maximum solution temperature of 98°F.

APPLICABILITY: MODES 1, 2, 3, and 4.

#### ACTION:

With the RWST inoperable, restore the tank to OPERABLE status within 1 hour or be in at least HOT STANDBY within 6 hours and in COLD SHUTDOWN within the following 30 hours.

#### SURVEILLANCE REQUIREMENTS

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4.5.4 The RWST shall be demonstrated OPERABLE:

- a. At least once per 7 days by:
  - 1) Verifying the contained borated water volume in the tank, and
  - 2) Verifying the boron concentration of the water.
- b. At least once per 24 hours by verifying the RWST temperature.

### 3/4.9 REFUELING OPERATIONS

#### 3/4.9.1 BORON CONCENTRATION

##### LIMITING CONDITION FOR OPERATION

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3.9.1 The boron concentration of all filled portions of the Reactor Coolant System and the refueling canal shall be maintained uniform and sufficient to ensure a boron concentration of greater than or equal to the limit specified in the COLR.

APPLICABILITY: MODE 6.\*

ACTION:

With the requirements of the above specification not satisfied, immediately suspend all operations involving CORE ALTERATIONS or positive reactivity changes and initiate and continue boration equivalent to 30 gpm at a boron concentration greater than or equal to the limit specified in the COLR for the Boric Acid Storage System until the boron concentration is restored to greater than or equal to the limit specified in the COLR.

##### SURVEILLANCE REQUIREMENTS

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4.9.1.1 Verify boron concentration is within the limits specified in the COLR prior to:

- a. Removing or unbolting the reactor vessel head, and
- b. Withdrawal of any full-length control rod in excess of 3 feet from its fully inserted position within the reactor vessel.

4.9.1.2 The boron concentration of the Reactor Coolant System and the refueling canal shall be determined by chemical analysis at least once per 72 hours.

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\* The reactor shall be maintained in MODE 6 whenever fuel is in the reactor vessel with the vessel head closure bolts less than fully tensioned or with the head removed.



## ADMINISTRATIVE CONTROLS

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### MONTHLY OPERATING REPORTS

6.8.1.5 Routine reports of operating statistics and shutdown experience shall be submitted on monthly basis to the U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, Attn: Document Control Desk, with a copy to the NRC Regional Administrator, no later than the 15th of each month following the calendar month covered by the report.

### CORE OPERATING LIMITS REPORT

6.8.1.6.a Core operating limits shall be established and documented in the CORE OPERATING LIMITS REPORT prior to each reload cycle, or prior to any remaining portion of a reload cycle, for the following:

1. Cycle dependent Overpower  $\Delta T$  and Overtemperature  $\Delta T$  trip setpoint parameters and function modifiers for operation with skewed axial power profiles for Table 2.2-1 of Specification 2.2.1.
2. Cycle dependent maximum allowable combination of thermal power, pressurizer pressure and the highest operating loop average temperature ( $T_{avg}$ ) for Specifications 2.1.1 and 2.1.2.
3. SHUTDOWN MARGIN and minimum boron concentration limits for MODES 1, 2, 3, and 4 for Specification 3.1.1.1.
4. SHUTDOWN MARGIN and minimum boron concentration limits for MODE 5 for Specification 3.1.1.2.
5. Moderator Temperature Coefficient BOL and EOL limits, and 300 ppm surveillance limit for Specification 3.1.1.3.
6. The minimum boron concentration for Modes 4, 5, and 6 for Specification 3.1.2.7.
7. Shutdown Rod Insertion limit for Specification 3.1.3.5.
8. Control Rod Bank Insertion limits for Specification 3.1.3.6.
9. AXIAL FLUX DIFFERENCE limits for Specification 3.2.1.
10. Heat Flux Hot Channel Factor,  $F_{\Delta}^{RTP}$  and  $K(Z)$  for Specification 3.2.2.
11. Nuclear Enthalpy Rise Hot Channel Factor, and  $F_{\Delta H}^{RTP}$  for Specification 3.2.3.

## ADMINISTRATIVE CONTROLS

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### 6.8.1.6.a. (Continued)

12. Cycle dependent DNB-related parameters for reactor coolant system average temperature ( $T_{avg}$ ), and pressurizer pressure for Specification 3.2.5.
13. The boron concentration limits for MODES 1, 2 and 3 for Specification 3.5.1.1.
14. The boron concentration limits for MODES 1, 2, 3 and 4 for Specification 3.5.4.
15. The boron concentration limits for MODE 6 for Specification 3.9.1.

6.8.1.6.b The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC in:

1. WCAP-10266-P-A, Rev. 2 with Addenda (Proprietary) and WCAP-11524-A, Rev. 2 with Addenda (Nonproprietary), "The 1981 Version of the Westinghouse ECCS Evaluation Model Using the BASH Code", March, 1987.

Methodology for Specification:

3.2.2 - Heat Flux Hot Channel Factor

2. WCAP-10079-P-A, (Proprietary) and WCAP-10080-A (Nonproprietary), "NOTRUMP: A Nodal Transient Small Break and General Network Code", August, 1985.

Methodology for Specification:

3.2.2 - Heat Flux Hot Channel Factor

3. YAEC-1363-A, "CASMO-3G Validation," April, 1988.

YAEC-1659-A, "SIMULATE-3 Validation and Verification," September, 1988.

WCAP-11596-P-A, (Proprietary), "Qualification of the PHOENIX-P/ANC Nuclear Design System for Pressurized Water Reactor Cores", June, 1988.

WCAP-10965-P-A, (Proprietary), "ANC: A Westinghouse Advanced Nodal Computer Code", September, 1986.

## ADMINISTRATIVE CONTROLS

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### 6.8.1.6.b. (Continued)

#### Methodology for Specifications:

- 3.1.1.1 - SHUTDOWN MARGIN for MODES 1,2, 3, and 4
- 3.1.1.2 - SHUTDOWN MARGIN for MODE 5
- 3.1.1.3 - Moderator Temperature Coefficient
- 3.1.3.5 - Shutdown Rod Insertion Limit
- 3.1.3.6 - Control Rod Insertion Limits
- 3.2.1 - AXIAL FLUX DIFFERENCE
- 3.2.2 - Heat Flux Hot Channel Factor
- 3.2.3 - Nuclear Enthalpy Rise Hot Channel Factor

4. Seabrook Station Updated Final Safety Analysis Report, Section 15.4.6, "Chemical and Volume Control System Malfunction That Results in a Decrease in the Boron Concentration in the Reactor Coolant System".

#### Methodology for Specifications:

- 3.1.1.1 - SHUTDOWN MARGIN for MODES 1, 2, 3, and 4
- 3.1.1.2 - SHUTDOWN MARGIN for MODE 5

5. YAEC-1241, "Thermal-Hydraulic Analysis of PWR Fuel Elements Using the CHIC-KIN Code", R. E. Helfrich, March, 1981.

WCAP-14565-P, (Proprietary), "VIPRE-01 Modeling and Qualification for Pressurized Water Reactor Non-LOCA Thermal-Hydraulic Safety Analysis", April, 1997.

Letter from T. H. Essig (NRC) to H. Sepp (Westinghouse), "Acceptance for Referencing of Licensing Topical Report WCAP-14565-P, (Proprietary), "VIPRE-01 Modeling and Qualification for Pressurized Water Reactor Non-LOCA Thermal-Hydraulic Safety Analysis", January, 1999.

#### Methodology for Specification:

- 2.1 - Safety Limits
- 3.2.1 - AXIAL FLUX DIFFERENCE
- 3.2.2 - Heat Flux Hot Channel Factor
- 3.2.3 - Nuclear Enthalpy Rise Hot Channel Factor
- 3.2.5 - DNB Parameters

6. YAEC-1849P, "Thermal-Hydraulic Analysis Methodology Using VIPRE-01 For PWR Applications," October, 1992.

WCAP-11397-P-A, (Proprietary), "Revised Thermal Design Procedure", April, 1989.

## ADMINISTRATIVE CONTROLS

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### 6.8.1.6.b. (Continued)

15. WCAP-9272-P-A, (Proprietary), "Westinghouse Reload Safety Evaluation Methodology", July, 1985.

Methodology for Specifications:

- 2.1 - Safety Limits
- 3.1.1.1 - SHUTDOWN MARGIN for MODES 1,2,3, and 4
- 3.1.1.2 - SHUTDOWN MARGIN for MODE 5
- 3.1.1.3 - Moderator Temperature Coefficient
- 3.1.2.7 - Isolation of Unborated Water Sources - Shutdown
- 3.1.3.5 - Shutdown Rod Insertion Limit
- 3.1.3.6 - Control Rod Insertion Limits
- 3.2.1 - AXIAL FLUX DIFFERENCE
- 3.2.2 - Heat Flux Hot Channel Factor
- 3.2.3 - Nuclear Enthalpy Rise Hot Channel Factor
- 3.2.5 - DNB Parameters
- 3.5.1.1 - Accumulators for MODES 1, 2 and 3
- 3.5.4 - Refueling Water Storage Tank for MODES 1, 2, 3, and 4
- 3.9.1 - Boron Concentration

- 6.8.1.6.c. The core operating limits shall be determined so that all applicable limits (e.g., fuel thermal-mechanical limits, core thermal-hydraulic limits, ECCS limits, nuclear limits such as SHUTDOWN MARGIN, and transient and accident analysis limits) of the safety analysis are met. The CORE OPERATING LIMITS REPORT for each reload cycle, including any mid-cycle revisions or supplements thereto, shall be provided upon issuance, to the NRC Document Control Desk with copies to the Regional Administrator and the Resident Inspector.

## 3/4.1 REACTIVITY CONTROL SYSTEMS

### BASES

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#### 3/4.1.1 BORATION CONTROL

##### 3/4.1.1.1 and 3/4.1.1.2 SHUTDOWN MARGIN

A sufficient SHUTDOWN MARGIN ensures that: (1) the reactor can be made subcritical from all operating conditions, (2) the reactivity transients associated with postulated accident conditions are controllable within acceptable limits, and (3) the reactor will be maintained sufficiently subcritical to preclude inadvertent criticality in the shutdown condition.

SHUTDOWN MARGIN requirements vary throughout core life as a function of fuel depletion, RCS boron concentration, and RCS  $T_{avg}$ . The most restrictive condition occurs at EOL, with  $T_{avg}$  at no-load operating temperature, and is associated with a postulated steam line break accident and resulting uncontrolled RCS cooldown. In the analysis of this accident, a minimum SHUTDOWN MARGIN as specified in the CORE OPERATING LIMITS REPORT (COLR) is required to control the reactivity transient. Accordingly, the SHUTDOWN MARGIN requirement is based upon this limiting condition and is consistent with FSAR safety analysis assumptions. With  $T_{avg}$  less than 200°F, the reactivity transients resulting from a postulated steam line break cooldown are minimal. A SHUTDOWN MARGIN as specified in the COLR and a boron concentration of greater than the limit specified in the COLR are required to permit sufficient time for the operator to terminate an inadvertent boron dilution event with  $T_{avg}$  less than 200°F.

The "equivalent to" statement in the Action is a provision providing an alternate method of emergency boration via the RWST at an increased flow rate to account for the lower boron concentration within the RWST.

##### 3/4.1.1.3 MODERATOR TEMPERATURE COEFFICIENT

The limitations on moderator temperature coefficient (MTC) are provided to ensure that the value of this coefficient remains within the limiting condition assumed in the FSAR accident and transient analyses.

The MTC values of this specification are applicable to a specific set of plant conditions; accordingly, verification of MTC values at conditions other than those explicitly stated will require extrapolation to those conditions in order to permit an accurate comparison.

The most negative MTC, value equivalent to the most positive moderator density coefficient (MDC), was obtained by incrementally correcting the MDC used in the FSAR analyses to nominal operating conditions. These corrections involved subtracting the incremental change in the MDC associated with a core condition of all rods inserted (most positive MDC) to an all rods withdrawn condition and, a conversion for the rate of change of moderator density with temperature at RATED THERMAL POWER conditions. This value of the MDC was then transformed into the limiting end of cycle life (EOL) MTC value as specified in the COLR. The 300 ppm surveillance limit MTC value as specified in the COLR represents a conservative value (with corrections for burnup and soluble boron) at a core condition of 300 ppm equilibrium boron concentration and is obtained by making these corrections to the limiting MTC value as specified in the COLR.

## REACTIVITY CONTROL SYSTEMS

### BASES

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#### 3/4.1.2 BORATION SYSTEMS

The limitations on OPERABILITY of isolation provisions for the Boron Thermal Regeneration System and the Reactor Water Makeup System in Modes 4, 5, and 6 ensure that the boron dilution flow rates cannot exceed the value assumed in the transient analysis.

The "equivalent to" statement in the Action for LCO 3.1.2.7 is a provision providing an alternate method of emergency boration via the RWST at an increased flow rate to account for the lower boron concentration within the RWST.

A resin bed is considered saturated with boron when the effluent boron concentration is within 5% or 5 ppm, whichever is greater, of the Reactor Coolant System boron concentration at the time the resin bed was saturated. Saturation ensures that no further boron may be removed by the resin bed regardless of the current boron concentration.

## POWER DISTRIBUTION LIMITS

### BASES

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#### 3/4.2.5 DNB PARAMETERS

The limits on the DNB-related parameters assure that each of the parameters is maintained within the normal steady-state envelope of operation assumed in the transient and accident analyses. The limits are consistent with the updated FSAR assumptions and have been analytically demonstrated adequate to assure compliance with acceptance criteria for each analyzed transient. Operating procedures include allowances for measurement and indication uncertainty so that the limits specified in the COLR for  $T_{avg}$  and for pressurizer pressure are not exceeded.

The 12-hour periodic surveillance of these parameters through instrument readout is sufficient to ensure that the parameters are restored within their limits following load changes and other expected transient operation.

The periodic surveillance of indicated RCS flow is sufficient to detect only flow degradation which could lead to operation outside the specified limit.

RCS flow must be greater than or equal to, 1) the Thermal Design Flow (TDF) with an allowance for measurement uncertainty and, 2) the minimum measured flow used in place of the TDF in the analysis of the DNB related events when the Revised Thermal Design Procedure (RTDP) methodology is utilized. Measurement of RCS total flow rate is performed by performance of either a precision calorimetric heat balance or normalized cold leg elbow tap  $\Delta P$  measurements. RCS flow measurements using either the precision heat balance or the elbow tap  $\Delta P$  measurement methods are to be performed at steady state conditions prior to operation above 95% rated thermal power (RTP) at the beginning of a new fuel cycle.

The elbow tap RCS flow measurement methodology is described in WCAP-15404, "Justification of Elbow Taps for RCS Flow Verification at Seabrook Station", dated April 2000.

## 3/4.9 REFUELING OPERATIONS

### BASES

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#### 3/4.9.1 BORON CONCENTRATION

The limit on the boron concentrations of the Reactor Coolant System (RCS) and the refueling canal/cavity during refueling ensures that the reactor remains subcritical during MODE 6. During refueling, the spent fuel pool water volumes and the reactor cavity water volumes will be connected when the fuel transfer gate valve is open. This configuration allows the bodies of water to be physically capable of being in contact, however, no effective mixing of the volumes occurs due to the constriction of the fuel transfer tube. The soluble boron concentration in each of these volumes is maintained greater than or equal to the limit specified in the COLR, or equivalent to a  $K_{eff}$  less than or equal to 0.95 when the fuel transfer gate is open. However, the spent fuel pool water boron concentration is under administrative controls and not a technical specification. They are independently maintained at the appropriate boron concentration even though no intermixing of significance exists. The mixing caused by the RHR pumps (reactor cavity) or the SFP system pumps assures uniformity of boron in the separate volumes.

The soluble boron concentration offsets the core reactivity and is measured by chemical analysis of a representative sample of the coolant in each of the volumes. Plant procedures ensure the specified boron concentration in order to maintain an overall core reactivity of  $k_{eff} \leq 0.95$  during fuel handling, with control rods and fuel assemblies assumed to be in the most adverse configuration (least negative reactivity) allowed by plant procedures.

GDC 26 of 10 CFR 50, Appendix A, requires that two independent reactivity control systems of different design principles be provided. One of these systems must be capable of holding the reactor core subcritical under cold conditions. The Chemical and Volume Control System (CVCS) is the system capable of maintaining the reactor subcritical in cold conditions by maintaining the boron concentration.

The reactor is brought to shutdown conditions before beginning operations to open the reactor vessel for refueling. After the RCS is cooled and depressurized and the vessel head is unbolted, the head is slowly removed to form the refueling cavity. The refueling canal and the refueling cavity are then flooded with borated water from the refueling water storage tank through the open reactor vessel by gravity feeding or by the use of the Residual Heat Removal (RHR) System pumps.

The pumping action of the RHR System in the RCS and the natural circulation due to thermal driving heads in the reactor vessel and refueling cavity mix the added solution of boric acid with the water in the refueling canal. The RHR System is in operation during refueling (see LCO 3.9.8.1, "Residual Heat Removal (RHR) and Coolant Circulation High Water Level," and LCO 3.9.8.2, "Residual Heat Removal (RHR) and Coolant Circulation — Low Water Level") to provide forced circulation in the RCS and assist in maintaining the boron concentrations in the RCS and the refueling canal/cavity at or above the limit specified in LCO 3.9.1.



## 3/4.9 REFUELING OPERATIONS

### BASES

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During refueling operations, the reactivity condition of the core is consistent with the initial conditions assumed for the boron dilution accident in the accident analysis and is conservative for MODE 6. The boron concentration limit specified is based on the core reactivity at the beginning of each fuel cycle (the end of refueling) and includes an uncertainty allowance.

The required boron concentration and the plant refueling procedures that verify the correct fuel loading plan (including full core mapping) ensure that the  $k_{\text{eff}}$  of the core will remain  $\leq 0.95$  during the refueling operation. Hence, at least 5%  $\Delta k/k$  margin of safety is established during refueling.

Continuation of CORE ALTERATIONS or positive reactivity additions (including actions to reduce boron concentration) is contingent upon maintaining the unit in compliance with the LCO.

During refueling operations water may be transferred to the refueling canal/cavity or the RCS from different sources. Transfers or additions of water whose boron concentration exceeds the required refueling boron concentration are acceptable. Transfers or additions of water where the boron concentration is less than the required refueling boron concentration may be made, provided that these additions are administratively controlled to ensure that the refueling boron concentration requirements continue to be met. That is, the final concentration of boron in the total volume, after the addition of water less than the required refueling boron concentration, exceeds the required refueling boron concentration, or  $k_{\text{eff}} \leq 0.95$ . Also, these administrative controls ensure such transfers or additions of water will not substantially reduce the uniformity of boron concentration in the RCS or refueling canal.

Likewise, transferring water to the RCS or the refueling canal/cavity that is lower in temperature (down to the operability requirements of the RWST in MODE 6; 50 DEG F) than the water contained in those volumes is also acceptable. These minimum requirements for boron concentration and water temperature are also applicable to other MODE 6 Technical Specification ACTIONS that limit operations involving positive reactivity additions to ensure that the reactor remains subcritical and an adequate shutdown margin is maintained.

Suspension of CORE ALTERATIONS and positive reactivity additions shall not preclude moving a component to a safe position. In addition to immediately suspending CORE ALTERATIONS or positive reactivity additions, boration to restore the concentration must be initiated immediately.

In determining the required combination of boration flow rate and concentration, no unique Design Basis Event must be satisfied. The only requirement is to restore the boron concentration to its required value as soon as possible. In order to raise the boron concentration as soon as possible, the operator should begin boration with the best source available for unit conditions. The "equivalent to" statement in the Action is a provision providing an alternate method of emergency boration via the RWST at an increased flow rate to account for the lower boron concentration within the RWST.

Once actions have been initiated, they must be continued until the boron concentration is restored. The restoration time depends on the amount of boron that must be injected to reach the required concentration.