H. L. Sumner, Jr. Vice President Hatch Project

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NL-04-0896

June 22, 2004

Docket Nos.: 50-321 50-366

U. S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, D. C. 20555-0001

#### Edwin I. Hatch Nuclear Plant, Units 1 and 2 Technical Specifications Amendment Request for Surveillance Requirement 3.3.8.1.4, Loss of Off-Site Power Instrumentation Logic System Functional Test

Ladies and Gentlemen:

In accordance with the provisions of 10 CFR 50.90, Southern Nuclear Operating Company (SNC) hereby proposes a change to the Plant Hatch Units 1 and 2 Technical Specifications, Appendix A to operating licenses DPR-57 and NPF-5, respectively. This submittal proposes to change the surveillance frequency of Surveillance Requirement (SR) 3.3.8.1.4, the logic system functional test for the Plant Hatch Units 1 and 2 emergency power supplies' loss of power instrumentation from once per 18 months to once per 24 months.

This change in the SR frequency is part of the Plant Hatch conversion to 24 month operating cycles from the previous 18 month operating cycles. The Technical Specifications revision which contained the change in the frequencies of many SRs to accommodate the 24 month cycle was formally approved by NRC on July 12, 2002. However, this particular surveillance was inadvertently omitted.

Enclosure 1 provides a description and justification for the proposed change. Enclosure 2 provides the significant hazards evaluation as well as the environmental evaluation. Enclosure 3 contains the marked up and published Technical Specifications and Bases pages.

[Affirmation and oath provided on following page]

U. S. Nuclear Regulatory Commission NL-04-0896 Page 2

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Currently, the logic system functional test would be required before the end of the current Unit 1 and 2 operating cycles. Performing the test on-line would introduce the potential for a unit trip with the corresponding transient risk increase and, as a result, Southern Nuclear requests that this amendment be approved and issued prior to December 1, 2004 to avoid the potential shutdown of Hatch Unit 2.

Mr. H. L. Sumner, Jr. states he is a Vice President of Southern Nuclear Operating Company, is authorized to execute this oath on behalf of Southern Nuclear Operating Company and to the best of his knowledge and belief, the facts set forth in this letter are true.

This letter contains no NRC commitments. If you have any questions, please advise.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY

H. L. Sumner, Jr.

vorn to and subscribed before me this <u>22</u> day of \_ 2004. Notary Public My commission expires: 4 - 28 - 07HLS/OCV/sdl

Enclosures:

- 1. Description and justification of change
- 2. No Significant Hazards and Environmental Evaluation
- 3. Changed Technical Specifications and Bases Pages

cc: <u>Southern Nuclear Operating Company</u> Mr. J. B. Beasley, Jr., Executive Vice President Mr. G. R. Frederick, General Manager – Plant Hatch RType: CHA02.004

<u>U. S. Nuclear Regulatory Commission</u> Dr. W. D. Travers, Regional Administrator Mr. C. Gratton, NRR Project Manager – Hatch Mr. D. S. Simpkins, Senior Resident Inspector – Hatch

<u>State of Georgia</u> Mr. L. C. Barrett, Commissioner – Department of Natural Resources

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> Edwin I. Hatch Nuclear Plant, Units 1 and 2 Technical Specifications Amendment Request for Surveillance Requirement 3.3.8.1.4, Loss of Off-Site Power Instrumentation Logic System Functional Test

> > Description and Justification of Change

## Edwin I. Hatch Nuclear Plant, Units 1 and 2 Technical Specifications Amendment Request for Surveillance Requirement 3.3.8.1.4, Loss of Off-Site Power Instrumentation Logic System Functional Test

#### Description and Justification of Change

#### **Description**

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This Technical Specifications (TS) amendment request proposes to revise the frequency of the logic system functional test (LSFT) for the 4 kV emergency busses' loss of power (LOP) instrumentation from once per 18 months to once per 24 months. Specifically, this test is contained in Surveillance Requirement (SR) 3.3.8.1.4 of the Plant Hatch Units 1 and 2 Technical Specifications. The functions affected are: 1) loss of voltage to the emergency busses, 2) degraded voltage to the emergency busses, and 3) the annunciation of the loss of voltage.

The Plant Hatch units are currently operated on 24 month cycles. To enable the transition from 18 month to 24 month cycles, many TS SRs were revised to change the frequency of those surveillances which were performed once per cycle during refueling outages. That TS change was approved by NRC on July 12, 2002. Both Hatch units are currently operating on a 24 month cycle with the Unit 2 cycle scheduled to end in March of 2005, and the Unit 1 cycle scheduled to end in March of 2006. (Unit 1 is on its second 24 month cycle following the spring, 2004 outage).

Under the current frequency requirement, SR 3.3.8.1.4 will be due for Hatch Unit 2 on August 1, 2004 with a late date of December 15, 2004. The Unit 1 SR was inadvertently performed late during the spring 2004 outage since, per Unit 1 TS SR 3.3.8.1.4, the LSFT came due before the end of the cycle. The performance of this SR is governed by the same procedures that test the diesel generator logic. The frequency of performance for the diesel LSFT SRs had already been changed to 24 months by the above referenced TS change and thus the procedures were revised to reflect the new frequency. However, the TS frequency had not been changed for the LOP instrumentation LSFT. Consequently, the LOP LSFT was erroneously performed at the 24 month frequency, during the spring outage. Under the current requirement, the next performance of the Unit 1 SR will also come due before the end of the current operating cycle.

As explained below, performance of SR 3.3.8.1.4 on line is impractical and thus may result in bringing the Hatch Units to a shutdown condition unless the SR frequency is changed per this amendment request.

#### **Justification**

The Plant Hatch emergency power system, for each unit, consists of three emergency power distribution centers (or busses) which energize various emergency systems necessary for the mitigation of design basis events such as a loss of coolant accident (LOCA). Among the loads powered by these busses are the four low pressure coolant injection (LPCI) pumps and the two core spray (CS) pumps which provide cooling water to the reactor pressure vessel in the event of a LOCA. Also powered are service water pumps which function to remove heat from the primary system during the LOCA.

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## Edwin I. Hatch Nuclear Plant, Units 1 and 2 Technical Specifications Amendment Request for Surveillance Requirement 3.3.8.1.4, Loss of Off-Site Power Instrumentation Logic System Functional Test

#### Description and Justification of Change

The emergency busses are normally energized from the off-site power system. If off-site power is lost, power must be transferred to on-site emergency power, which consists of a diesel generator for each emergency bus. One of the emergency busses for each unit shares a diesel generator. Thus, each unit has two dedicated diesel generators and one shared diesel. The function of the loss of power instrumentation is to monitor the voltage on these busses, and if necessary, to effect a transfer of the source of power for these busses from the off-site power supply to the on-site diesel generators. This is accomplished by either the loss of voltage <u>or</u> the degraded voltage function. The annunciation relays provide control room alarms to the operators of the low voltage condition.

If a LOCA were to occur concurrent with a loss of off-site power (LOSP) event, certain loads would be 'shed' from the emergency busses. The diesel generators would then re-energize the busses and the cooling water pumps would sequence onto the emergency busses to provide the necessary core and containment cooling to maintain the plant in a safe shutdown condition. The logic for the re-energization of the busses and the sequencing of the loads onto the re-energized busses is tested once per cycle by a series of overlapping surveillances. The loss of power instrumentation surveillance, which is the subject of this TS amendment request, tests the ability of the loss of power relays to separate the busses from the lost off-site power supply and then connect the de-energized busses to the onsite diesel generators. The shedding of loads and the later sequencing of loads back onto the energized busses are tested by SRs in the AC sources section of the TS, specifically SRs 3.8.1.9 and 3.8.1.17. The frequencies of SRs 3.8.1.9 and 3.8.1.17 have already been changed to once per 24 months, by the previously mentioned TS change.

It is apparent that the frequency was not changed for SR 3.3.8.1.4 due to an oversight. During the initial feasibility reviews for 24 month cycles, as-found test data reviews for Westinghouse CV-7 relays used for the LOP application discovered some out of tolerance limits which did not support decreasing the surveillance frequency. These problems were attributed to relay setpoint drift. Consequently, SR 3.3.8.1.3 (CHANNEL CALIBRATION) was left at once per 18 months. Due to these same concerns, it appears that SR 3.3.8.1.4 was erroneously left at 18 months. However, the setpoint drifts do not affect the logic test, and are in fact being addressed by performing the calibration every 12 months, more frequently than required by the TS.

The logic for the LOP relays and the diesel generator auto-sequencing are tested by one procedure at Hatch, which is performed during each refueling outage. As described in the ensuing paragraphs, it would be impractical to separate these surveillances from the diesel logic test and perform the LOP test on line, as would be required if the LOP test SR frequency were left at 18 months.

## Edwin I. Hatch Nuclear Plant, Units 1 and 2 Technical Specifications Amendment Request for Surveillance Requirement 3.3.8.1.4, Loss of Off-Site Power Instrumentation Logic System Functional Test

#### Description and Justification of Change

The LOP test requires de-energizing the emergency 4 kV bus. This may result in the trip of one, or two, Plant Service Water (PSW) pumps depending on which bus is de-energized and the number of pumps in service. At least three of four PSW pumps are running to remove heat from plant components, such as the reactor building closed cooling water (RBCCW) heat exchanger. The trip of the 4 kV busses would also result in the loss of power to LPCI pumps and, depending on which 4 kV bus is deenergized, to a CS pump. Additionally one of the two emergency 600 V busses would trip. A 600 V bus trip results in a trip of one-half of the reactor protection system (RPS) logic. With one half of the logic de-energized, a trip of the other RPS system, due to a real or spurious signal, would of course result in a full reactor scram. Additionally, the loss of the 600 V bus would result in the de-energization of the following plant components:

- One of the three station service air compressors,
- One, or two, of the three RBCCW pumps,

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- One of two standby liquid control pumps,
- One, or two, of the three control room air handling units (if a unit 1 bus is affected),
- One of the two control room filter trains (if a unit 1 bus is affected),
- One of the two standby gas treatment filter trains,
- Many other auxiliary plant systems.

With regard to the station service air compressors, the one compressor normally in service receives its power from a non-safety related power source. Thus, de-energization of one of the safety related 600 V busses would not affect the normally running compressor, but would remove power from one of the back-up compressors.

As noted, loss of a 600 V emergency bus will result in the loss of one, or two of the RBCCW pumps, depending on which bus is de-energized. With two of three pumps normally running, performing this surveillance on-line will reduce the heat removal capabilities of the RBCCW system to its loads, some of which are the recirculation pump motor windings and bearings, drywell sump coolers, control rod drive pump coolers, reactor water clean-up pump coolers, and the reactor water cleanup system heat exchangers.

Performance of this on line would result in an increased risk of a unit trip and, therefore, it is impractical to perform this test on-line. Consequently, SNC seeks an expedited review of this TS

E1 - 3

## Edwin I. Hatch Nuclear Plant, Units 1 and 2 Technical Specifications Amendment Request for Surveillance Requirement 3.3.8.1.4, Loss of Off-Site Power Instrumentation Logic System Functional Test

#### Description and Justification of Change

amendment request to revise the frequency of the LOP instrumentation surveillance from once per 18 months to once per 24 months.

To justify the actual change in frequency, surveillance sheets of the LSFT were reviewed to determine the recent performance of the instrumentation. Specifically, the following surveillances were reviewed:

• October, 1998, 2E emergency bus

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- October 1998, 2F emergency bus
- October 1998, 2G emergency bus
- April, 1999, 1G emergency bus
- April, 1999, 1F emergency bus
- April 1999, 1E emergency bus
- April, 2000, 2E emergency bus
- April, 2000, 2F emergency bus
- April, 2000, 2G emergency bus
- October, 2000, 1E emergency bus
- November, 2000, 1F emergency bus
- November, 2000, 1G emergency bus
- October, 2001, 2E emergency bus
- October, 2001, 2F emergency bus
- April, 2002, 1E emergency bus
- April, 2002, 1F emergency bus
- April, 2002, 1G emergency bus
- March, 2003, 2G emergency bus
- March, 2003, 2E emergency bus
- March, 2003, 2F emergency bus
- March, 2004, 1E emergency bus
- March, 2004, 1F emergency bus
- March, 2004, 1G emergency bus

None of the surveillance sheets indicated that the LOP relays had either failed to disconnect the emergency bus from the off-site source or failed to reconnect the bus to the emergency diesel generator. However, in the October 2000 test for the 1E emergency bus, the April 2002 test for the 1F bus, and the March 2004 test for the 1F and the 1G bus, the LOSP annunciator failed to initiate.

In the 23 tests reviewed, therefore, there were no failures of the LOP instrumentation to disconnect from off-site sources and reconnect the bus to the onsite AC sources. Only the

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## Edwin I. Hatch Nuclear Plant, Units 1 and 2 Technical Specifications Amendment Request for Surveillance Requirement 3.3.8.1.4, Loss of Off-Site Power Instrumentation Logic System Functional Test

#### Description and Justification of Change

annunciation of the LOSP exhibited some failures. The failure of the annunciation, however, does not prevent the LOP relays from performing their safety function.

In summary, performing the test on-line places the plant in a condition of increased risk due to the many key systems that would be out of service. Consequently, the likelihood of a plant transient is increased, and for that reason, an expedited review is requested. The review of past surveillances demonstrates that the 24 month frequency is acceptable for performance of the LOP instrumentation LSFT.

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Edwin I. Hatch Nuclear Plant, Units 1 and 2 Technical Specifications Amendment Request for Surveillance Requirement 3.3.8.1.4, Loss of Off-Site Power Instrumentation Logic System Functional Test

No Significant Hazards and Environmental Evaluation

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## Edwin I. Hatch Nuclear Plant, Units 1 and 2 Technical Specifications Amendment Request for Surveillance Requirement 3.3.8.1.4, Loss of Power Instrumentation Logic System Functional Test

## No Significant Hazards and Environmental Evaluation

In 10 CFR 50.92, the NRC provides the following standards to be used in determining the existence of a significant hazards consideration:

... a proposed amendment to an operating facility licensed under 50.21(b) or 50.22 or for a testing facility involves no significant hazards consideration, if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any previously evaluated; or (3) involve a significant reduction in the margin of safety.

Southern Nuclear Operating Company (SNC) has reviewed the proposed licensing amendment and concluded that the change does not involve a significant hazards consideration because (1) the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated, (2) the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated, and (3) does not involve a significant reduction in the margin of safety.

#### **Basis for no Significant Hazards Consideration**

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# 1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

This is a proposed change to the surveillance requirement (SR) for the logic system functional test (LSFT) of the loss of power (LOP) instrumentation for Plant Hatch Units 1 and 2 (SR 3.3.8.1.4). The LOP instrumentation functions to monitor the voltage on the 4 kV emergency busses and, if necessary, to disconnect these busses from the offsite power source and re-connect them to on-site power. This would, of course, be necessary if a bus experienced a loss of, or a degraded, voltage. This ensures an adequate response to a loss of coolant accident (LOCA) if that accident were to occur simultaneously with a loss of off-site power (LOSP). The probability of occurrence of a previously evaluated event, such as a LOCA/LOSP, will not increase since the LOP instrumentation is not being physically altered as a result of this change in such a manner which may increase the likelihood of failure. In fact, it is not being physically altered at all as a result of this submittal.

Additionally, no other safety related equipment or components designed to prevent the occurrence of a previously evaluated event are being physically altered or otherwise affected as a result of this TS change request.

The consequences of a previously evaluated event will not increase as a result of revising the surveillance frequency for the LOP instrumentation. Review of surveillance histories demonstrates adequate performance for the LOP relays in ultimately connecting the emergency

## Edwin I. Hatch Nuclear Plant, Units 1 and 2 Technical Specifications Amendment Request for Surveillance Requirement 3.3.8.1.4, Loss of Power Instrumentation Logic System Functional Test

## No Significant Hazards and Environmental Evaluation

power sources to the distribution bus, justifying the revision in the surveillance frequency. Therefore, the LOP instrumentation can be reasonably expected to perform its function in a LOCA/LOSP event, even with the revised frequency for the LSFT.

For the above reasons, the change in the LSFT frequency does not involve a significant increase in the probability or consequences of a previously evaluated event.

# 2. The proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

The LOP instrumentation is not being physically altered. Furthermore, its operation and maintenance will remain within the design bases. The only proposed change is the frequency of the logic system functional test. Since no new modes of operation are being introduced, a new or different kind of accident from any previously evaluated is not created.

#### 3. The proposed change does not involve a significant reduction in the margin of safety.

The function of the LOP instrumentation is to ensure that the emergency power distribution busses receive adequate power from either the off-site or on-site sources. The LOP relays will initiate a transfer of the emergency 4 kV busses to the on-site diesel generators on a loss of coolant accident with a concurrent loss of off-site power. The diesel logic will then sequence the cooling water pumps and other safety related equipment onto their respective emergency bus. This sequencing of loads is tested by a different surveillance requirement which is not affected by this TS change request and has already been revised to a frequency of once per 24 months. This proposed TS revision only changes the frequency of performance of the LSFT for the LOP instrumentation. A review of surveillance histories shows that these relays perform adequately in the re-connection of the emergency busses to the on-site power source. Some problems have been noted in the history review with the loss of off-site power annunciation. However, the annunciator does not affect the safety function of providing power to the distribution bus.

For the above reasons, the margin of safety is not reduced by this proposed Technical Specifications change.

#### **Environmental Evaluation**

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10 CFR 51.22(c)(9) provides criteria for identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed amendment

## Edwin I. Hatch Nuclear Plant, Units 1 and 2 Technical Specifications Amendment Request for Surveillance Requirement 3.3.8.1.4, Loss of Power Instrumentation Logic System Functional Test

#### No Significant Hazards and Environmental Evaluation

to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed license amendment will not:

1. involve a significant hazards consideration,

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- 2. result in a significant change in the types, or a significant increase in the amounts, of any effluents that may be released off-site.
- 3. result in a significant increase in the individual or cumulative occupational exposure.

Southern Nuclear has evaluated the proposed changes and determined the changes do not involve (1) a significant hazards consideration, (2) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (3) a significant increase in the individual or cumulative occupational exposure. Accordingly, the proposed changes meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9), and an environmental assessment of the proposed change is not required.

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Edwin I. Hatch Nuclear Plant, Unit s 1 and 2 Technical Specifications Amendment Request for Surveillance Requirement 3.3.8.1.4, Loss of Off-Site Power Instrumentation Logic System Functional Test

Changed Technical Specifications and Bases Pages

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#### SURVEILLANCE REQUIREMENTS

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--NOTES---

- 1. Refer to Table 3.3.8.1-1 to determine which SRs apply for each LOP Function.
- 2. When a 4.16 kV Emergency Bus Undervoltage 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 initiation capability (for Functions 1 and 2) and annunciation capability (for Function 3).

	SURVEILLANCE	FREQUENCY
SR 3.3.8.1.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.8.1.2	Perform CHANNEL FUNCTIONAL TEST.	31 days
SR 3.3.8.1.3	Perform CHANNEL CALIBRATION.	18 months
SR 3.3.8.1.4	Perform LOGIC SYSTEM FUNCTIONAL TEST.	118 months

#### SURVEILLANCE REQUIREMENTS

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SR 3.3.8.1.4	Perform LOGIC SYSTEM FUNCTIONAL TEST.	18 months

LOP Instrumentation B 3.3.8.1

BASES		
SURVEILLANCE REQUIREMENTS	SR 3 The s overla safet The [ Surve the p perfo show porfe	3.3.8.1.4 (continued) system functional testing performed in LCO 3.8.1 and LCO 3.8.2 aps this Surveillance to provide complete testing of the assumed y functions. 19 month Frequency is based on the need to perform this eillance under the conditions that apply during a plant outage and botential for an unplanned transient if the Surveillance were ormed with the reactor at power. Operating experience has in these components usually pass the Surveillance when ormed at the 18 month Frequency.
REFERENCES	1.	FSAR, Section 8.4.
	2.	FSAR, Section 4.8.
	З.	FSAR, Section 6.5.
	4.	FSAR, Chapter 14.
	5.	NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.
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The 24 month frequency is further based on a review of surveillance test history.

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		LOP Instrumentation B 3.3.8.1
BASES		
SURVEILLANCE REQUIREMENTS	<u>SR :</u>	3.3.8.1.4 (continued)
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REFERENCES	1.	FSAR, Section 8.3.1.
	2.	FSAR, Section 5.2.
	3.	FSAR, Section 6.3.
	4.	FSAR, Chapter 15.
	E	NPC No. 02 102 "Final Policy Statement on Technical

5. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

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## SURVEILLANCE REQUIREMENTS

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#### SURVEILLANCE REQUIREMENTS

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- 1. Refer to Table 3.3.8.1-1 to determine which SRs apply for each LOP Function.
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BASES			
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LOP Instrumentation B 3.3.8.1

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BASES			
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	2.	FSAR, Section 5.2.	
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	4.	FSAR, Chapter 15.	
	5.	NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.	
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