Attachment 2

Serial No. 04-381

Virginia Electric and Power Company
North Anna Power Station Units 1 and 2
Proposed Technical Specifications Changes For
Extended Fluid Systems Completion Times

Mark-Up of Proposed Changes

North Anna Power Station
Units 1 and 2
Virginia Electric and Power Company
(Dominion)

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

3.5.2 ECCS—Operating

LCO 3.5.2 Two ECCS trains shall be OPERABLE.

-------------------------------- NOTE --------------------------------
In MODE 3, both safety injection (SI) pump flow paths may be isolated by closing the isolation valves for up to 2 hours to perform pressure isolation valve testing per SR 3.4.14.1.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more trains inoperable.	A.1 Restore train(s) to OPERABLE status.	------NOTE------ The Completion Time for the July 21, 2004 entry into Condition A for the Unit 1 "A" train of the Low Head Safety Injection System is 7 days --------------- 72 hours
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3. AND B.2 Be in MODE 4.	6 hours 12 hours
C. Less than 100% of the ECCS flow equivalent to a single OPERABLE ECCS train available.	C.1 Enter LCO 3.0.3.	Immediately

Insert 1

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
a. One Low Head Safety Injection (LHSI) subsystem train inoperable.	a.1 Restore subsystem train to OPERABLE status.	7 days

3.6 CONTAINMENT SYSTEMS

3.6.6 Quench Spray (QS) System

LCO 3.6.6 Two QS trains shall be OPERABLE.

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

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One QS train inoperable.	A.1 Restore QS train to OPERABLE status.	~~72 hours~~ 7 days
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3. AND B.2 Be in MODE 5.	6 hours 36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.6.1	Verify each QS manual, power operated, and automatic valve in the flow path that is not locked, sealed, or otherwise secured in position is in the correct position.	31 days
SR 3.6.6.2	Verify each QS pump's developed head at the flow test point is greater than or equal to the required developed head.	In accordance with the Inservice Testing Program

3.6 CONTAINMENT SYSTEMS

3.6.8 Chemical Addition System

LCO 3.6.8 The Chemical Addition System shall be OPERABLE.

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

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Chemical Addition System inoperable.	A.1 Restore Chemical Addition System to OPERABLE status.	~~72 hours~~ 7 days
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3. AND B.2 Be in MODE 5.	6 hours 84 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.8.1	Verify each Chemical Addition System manual, power operated, and automatic valve in the flow path that is not locked, sealed, or otherwise secured in position is in the correct position.	31 days
SR 3.6.8.2	Verify chemical addition tank solution volume is ≥ 4800 gal and ≤ 5500 gal.	184 days
SR 3.6.8.3	Verify chemical addition tank NaOH solution concentration is ≥ 12% and ≤ 13% by weight.	184 days

3.7 PLANT SYSTEMS

3.7.5 Auxiliary Feedwater (AFW) System

LCO 3.7.5 Three AFW trains shall be OPERABLE.

------------------------------NOTE------------------------------

Only one AFW train, which includes a motor driven pump, is required to be OPERABLE in MODE 4.

APPLICABILITY: MODES 1, 2, and 3,
MODE 4 when steam generator is relied upon for heat removal.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One steam supply to turbine driven AFW pump inoperable. ~~OR~~ ~~-----NOTE-----~~ ~~Only applicable if MODE 2 has not been entered following refueling.~~ ~~----------------~~ ~~One turbine driven AFW pump inoperable in MODE 3 following refueling.~~	A.1 Restore steam supply ~~affected equipment~~ to OPERABLE status.	7 days <u>AND</u> 14 ~~10~~ days from discovery of failure to meet the LCO
B. One AFW train inoperable in MODE 1, 2 or 3 for reasons other than Condition A.	B.1 Restore AFW train to OPERABLE status.	~~72 hours~~ 7 days <u>AND</u> 14 ~~10~~ days from discovery of failure to meet the LCO

B 3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

B 3.5.2 ECCS—Operating

BASES

BACKGROUND

The function of the ECCS is to provide core cooling and negative reactivity to ensure that the reactor core is protected after any of the following accidents:

a. Loss of coolant accident (LOCA), coolant leakage greater than the capability of the normal charging system;

b. Rupture of a control rod drive mechanism-control rod assembly ejection accident;

c. Loss of secondary coolant accident, including uncontrolled steam release or loss of feedwater; and

d. Steam generator tube rupture (SGTR).

The addition of negative reactivity is designed primarily for the MSLB where primary cooldown could add enough positive reactivity to achieve criticality and return to significant power.

There are three phases of ECCS operation: injection, cold leg recirculation, and hot leg recirculation. In the injection phase, water is taken from the refueling water storage tank (RWST) and injected into the Reactor Coolant System (RCS) through the cold legs. When sufficient water is removed from the RWST to ensure that enough boron has been added to maintain the reactor subcritical and the containment sumps have enough water to supply the required net positive suction head to the ECCS pumps, suction is switched to the containment sump for cold leg recirculation. Within approximately 5 hours, the ECCS flow is shifted to the hot leg recirculation phase to provide a backflush, which would reduce the boiling in the top of the core and any resulting boron precipitation.

~~The~~ ECCS consists of two separate subsystems: High Head Safety Injection (HHSI) and Low Head Safety Injection (LHSI). ~~Each subsystem consists of~~ two redundant, 100% capacity trains. The ECCS accumulators and the RWST are also part of the ECCS, but are not considered part of an ECCS flow path as described by this LCO.

(continued)

BASES

LCO (continued)

The flow path for each train must maintain its designed independence to ensure that no single failure can disable both ECCS trains.

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

APPLICABILITY

In MODES 1, 2, and 3, the ECCS OPERABILITY requirements for the limiting Design Basis Accident, a large break LOCA, are based on full power operation. Although reduced power would not require the same level of performance, the accident analysis does not provide for reduced cooling requirements in the lower MODES. MODE 2 and MODE 3 requirements are bounded by the MODE 1 analysis.

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

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

ACTIONS

INSERT 2

B ~~A~~.1

With one or more trains inoperable for reasons other than Condition A, and at least 100% of the ECCS flow equivalent to a single OPERABLE ECCS train available, the inoperable components must be returned to OPERABLE status within 72 hours. The 72 hour Completion Time is based on an NRC reliability evaluation (Ref. 5) and is a reasonable time for repair of many ECCS components.

~~A note has been added to this Action's Completion Time to permit a one-time extension of the Completion Time to 7 days to effect repairs on the Unit 1 "A" LHSI train.~~

(continued)

Insert 2 – LHSI Basis

A.1 With one LHSI subsystem train inoperable, the LHSI subsystem train must be returned to OPERABLE status within 7 days. In this condition the remaining OPERABLE ECCS train is adequate to perform the heat removal function. The 7-day Completion Time is reasonable to perform maintenance on the inoperable LHSI subsystem. The 7-day Completion Time is based on a plant specific deterministic and probabilistic analysis.

BASES

ACTIONS

A.1 (continued)

An ECCS train is inoperable if it is not capable of delivering design flow to the RCS. Individual components are inoperable if they are not capable of performing their design function or supporting systems are not available.

The LCO requires the OPERABILITY of a number of independent subsystems. Due to the redundancy of trains and the diversity of subsystems, the inoperability of one active component in a train does not render the ECCS incapable of performing its function. Neither does the inoperability of two different components, each in a different train, necessarily result in a loss of function for the ECCS (e.g., an inoperable HHSI pump in one train, and an inoperable LHSI pump in the other). This allows increased flexibility in unit operations under circumstances when components in opposite trains are inoperable.

An event accompanied by a loss of offsite power and the failure of an EDG can disable one ECCS train until power is restored. A reliability analysis (Ref. 5) has shown that the impact of having one full ECCS train inoperable is sufficiently small to justify continued operation for 72 hours.

B.1 and B.2

If the inoperable trains cannot be returned to OPERABLE status within the associated Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to MODE 3 within 6 hours and MODE 4 within 12 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

C.1

Condition A is applicable with one or more trains inoperable. The allowed Completion Time is based on the assumption that at least 100% of the ECCS flow equivalent to a single OPERABLE ECCS train is available. With less than 100% of the ECCS flow equivalent to a single OPERABLE ECCS train available, the facility is in a condition outside of the accident analyses. Therefore, LCO 3.0.3 must be entered immediately.

BASES

LCO (continued)

Each QS train includes a spray pump, a dedicated spray header, nozzles, valves, piping, instruments, and controls to ensure an OPERABLE flow path capable of taking suction from the RWST.

APPLICABILITY

In MODES 1, 2, 3, and 4, a DBA could cause a release of radioactive material to containment and an increase in containment pressure and temperature requiring the operation of the QS System.

In MODES 5 and 6, the probability and consequences of these events are reduced due to the pressure and temperature limitations of these MODES. Thus, the QS System is not required to be OPERABLE in MODE 5 or 6.

ACTIONS

A.1

If one QS train is inoperable, it must be restored to OPERABLE status within ~~72 hours~~ [7 days]. The components available in this degraded condition are capable of providing 100% of the heat removal and iodine removal needs after an accident. ~~The 72 hour Completion Time was developed taking into account the redundant heat removal and iodine removal capabilities afforded by the OPERABLE train and the low probability of a DBA occurring during this period.~~ [The 7-day Completion Time is based on a plant specific deterministic and probabilistic analysis.]

B.1 and B.2

If the Required Action and associated Completion Time are not met, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

SURVEILLANCE REQUIREMENTS

SR 3.6.6.1

Verifying the correct alignment of manual, power operated, and automatic valves, excluding check valves, in the QS System provides assurance that the proper flow path exists for QS System operation. This SR does not apply to valves that are locked, sealed, or otherwise secured in position,

(continued)

BASES

LCO (continued)

In addition, it is essential that valves in the Chemical Addition System flow paths are properly positioned and that automatic valves are capable of activating to their correct positions.

APPLICABILITY

In MODES 1, 2, 3, and 4, a DBA could cause a release of radioactive material to containment requiring the operation of the Chemical Addition System. The Chemical Addition System assists in reducing the iodine fission product inventory prior to release to the environment.

In MODES 5 and 6, the probability and consequences of these events are reduced due to the pressure and temperature limitations in these MODES. Thus, the Chemical Addition System is not required to be OPERABLE in MODE 5 or 6.

ACTIONS

A.1

If the Chemical Addition System is inoperable, it must be restored to OPERABLE within ~~72 hours~~ 7 days. The pH adjustment of the Quench Spray System flow for iodine removal enhancement is reduced in this condition. The Quench Spray System would still be available and would remove some iodine from the containment atmosphere in the event of a DBA. The ~~72 hour~~ 7-day Completion Time takes into account the ability of the Quench Spray System to remove iodine at a reduced capability using the redundant Quench Spray flow path capabilities and the low probability of the worst case DBA occurring during this period. The 7-day Completion Time is justified by a plant specific deterministic and qualitative risk assessment.

B.1 and B.2

If the Chemical Addition System cannot be restored to OPERABLE status within the required Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to MODE 5 within 84 hours. The allowed Completion Time of 6 hours is reasonable, based on operating experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging unit systems. The extended interval to reach MODE 5 allows 48 hours for restoration of the Chemical Addition System in MODE 3 and 36 hours to reach MODE 5. This is reasonable when considering the reduced pressure and temperature conditions in MODE 3 for the release of radioactive material from the Reactor Coolant System.

BASES

LCO (continued)

steam supplies from each of two main steam supply paths through MS-TV-111A and MS-TV-111B (Unit 1), MS-TV-211A and MS-TV-211B (Unit 2), which receive steam from at least two of the three main steam lines upstream of the MSTVs. The piping, valves, instrumentation, and controls required to perform the safety function in the required flow paths also are required to be OPERABLE.

The LCO is modified by a Note indicating that one AFW train, which includes a motor driven pump, is required to be OPERABLE in MODE 4 when the steam generator is relied upon for heat removal. This is because of the reduced heat removal requirements and short period of time in MODE 4 during which the AFW is required and the insufficient steam available in MODE 4 to power the turbine driven AFW pump.

APPLICABILITY

In MODES 1, 2, and 3, the AFW System is required to be OPERABLE in the event that it is called upon to function when the MFW is lost. In addition, the AFW System is required to supply enough makeup water to replace the steam generator secondary inventory, lost as the unit cools to MODE 4 conditions.

In MODE 4 one AFW train is required to be OPERABLE when the steam generator(s) is relied upon for heat removal.

In MODE 5 or 6, the steam generators are not normally used for heat removal, and the AFW System is not required.

ACTIONS

A.1

If one of the two steam supplies, MS-TV-111A and MS-TV-111B (Unit 1), MS-TV-211A and MS-TV-211B (Unit 2), to the turbine driven AFW train is inoperable ~~or if a turbine driven AFW pump is inoperable while in MODE 3 immediately following refueling,~~ action must be taken to restore the ~~affected equipment~~ steam supply to ~~an~~ OPERABLE status within 7 days. The 7 day Completion Time is reasonable ~~, based on the following reasons:~~ since there is a redundant steam supply line for the turbine driven pump.

~~a. For the inoperability of a steam supply to the turbine driven AFW pump, the 7 day Completion Time is reasonable since there is a redundant steam supply line for the turbine driven pump.~~

(continued)

BASES

ACTIONS

A.1 (continued)

b. For the inoperability of a turbine driven AFW pump while in MODE 3 immediately subsequent to a refueling outage, the 7 day Completion Time is reasonable due to the minimal decay heat levels in this situation.

c. For both the inoperability of a steam supply line to the turbine driven pump and an inoperable turbine driven AFW pump while in MODE 3 immediately following a refueling outage, the 7 day Completion Time is reasonable due to the availability of redundant OPERABLE motor driven AFW pumps; and due to the low probability of an event requiring the use of the turbine driven AFW pump.

The second Completion Time for Required Action A.1 establishes a limit on the maximum time allowed for any combination of Conditions during any contiguous failure to meet this LCO.

The 10 14 day Completion Time provides a limitation time allowed in this specified Condition after discovery of failure to meet the LCO. This limit is considered reasonable for situations in which Conditions A and B are entered concurrently. The AND connector between 7 days and 10 14 days dictates that both Completion Times apply simultaneously, and the more restrictive must be met.

Condition A is modified by a Note which limits the applicability of the Conditions to when the unit has not entered MODE 2 following a refueling. Condition A allows the turbine driven AFW train to be inoperable for 7 days vice the 72 hour Completion Time in Condition B. This longer Completion Time is based on the reduced decay heat following refueling and prior to the reactor being critical.

B.1

With one of the required AFW trains (pump or flow path) inoperable in MODE 1, 2, or 3 for reasons other than Condition A, action must be taken to restore the AFW train to OPERABLE status within 72 hours 7 days. This Condition includes the loss of two steam supply lines to the turbine driven AFW pump. The 72 hour Completion Time is reasonable, based on redundant The 7-day Completion Time is based on a plant specific deterministic & probabilistic analysis.

(continued)

BASES

ACTIONS

B.1 (continued)

~~capabilities afforded by the AFW System, time needed f~~or ~~repairs, and the low probability of a DBA occurring durin~~g ~~this time period.~~

The second Completion Time for Required Action B.1 establishes a limit on the maximum time allowed for any combination of Conditions to be inoperable during any contiguous failure to meet this LCO.

The ~~10~~ 14 day Completion Time provides a limitation time allowed in this specified Condition after discovery of failure to meet the LCO. This limit is considered reasonable for situations in which Conditions A and B are entered concurrently. The AND connector between ~~72 hou~~rs 7 days and ~~10~~ 14 days dictates that both Completion Times apply simultaneously, and the more restrictive must be met.

INSERT 4

C.1 and C.2

When Required Action A.1 or B.1 cannot be completed within the required Completion Time, or if two AFW trains are inoperable in MODE 1, 2, or 3, the unit must be placed in a MODE in which the LCO does not apply. To achieve this status, the unit must be placed in at least MODE 3 within 6 hours, and in MODE 4 within 18 hours.

The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

In MODE 4, when the steam generator is relied upon for heat removal, with two AFW trains inoperable, operation is allowed to continue because only one motor driven pump AFW train is required in accordance with the Note that modifies the LCO. Although not required, the unit may continue to cool down and initiate RHR.

D.1

If all three AFW trains are inoperable in MODE 1, 2, or 3, the unit is in a seriously degraded condition with no safety related means for conducting a cooldown, and only limited means for conducting a cooldown with nonsafety related equipment. In such a condition, the unit should not be

(continued)

Insert 4 – AFW

The 7-day Completion Time is reasonable to perform maintenance on the inoperable AFW train. The 7-day Completion Time is based on a plant specific deterministic and probabilistic assessment consistent with RG 1.177. Based on the results of the RG 1.177 Tier 2 risk assessment the following systems or equipment is required to be available on the affected unit for entries into the 7-day Completion Time for planned maintenance: 1) both low head safety injection trains, 2) both high head safety injection trains including all three charging pumps, 3) both pressurizer PORVs and associated block valves, and 4) both EDGs. In addition, the AAC Diesel and charging cross-connect capability are also required to be available for planned maintenance entries into the 7-day Completion Time. Any unanticipated unavailability of this equipment during the 7-day Completion Time will be assessed in accordance with the 10 CFR 50.65(a)(4) program.

Entry into Condition B.1 is typical for planned maintenance and surveillance. For planned maintenance or surveillance activities the plant configuration will be assessed with the 10 CFR 50.65(a)(4) program prior to entering the Condition to avoid risk significant plant configurations.

Attachment 3

Serial No. 04-381

Virginia Electric and Power Company
North Anna Power Station Units 1 and 2
Proposed Technical Specifications Changes For
Extended Fluid Systems Completion Times

Proposed Change

North Anna Power Station
Units 1 and 2
Virginia Electric and Power Company
(Dominion)

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

3.5.2 ECCS—Operating

LCO 3.5.2 Two ECCS trains shall be OPERABLE.

-------------------------------NOTE-------------------------------
In MODE 3, both safety injection (SI) pump flow paths may be isolated by closing the isolation valves for up to 2 hours to perform pressure isolation valve testing per SR 3.4.14.1.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One Low Head Safety Injection (LHSI) subsystem train inoperable.	A.1 Restore subsystem train to OPERABLE status.	7 days
B. One or more ECCS trains inoperable for reasons other than Condition A.	B.1 Restore train(s) to OPERABLE status.	72 hours
C. Required Action and associated Completion Time of Condition A or B not met.	C.1 Be in MODE 3. AND C.2 Be in MODE 4.	6 hours 12 hours
D. Less than 100% of the ECCS flow equivalent to a single OPERABLE ECCS train available.	D.1 Enter LCO 3.0.3.	Immediately

3.6 CONTAINMENT SYSTEMS

3.6.6 Quench Spray (QS) System

LCO 3.6.6 Two QS trains shall be OPERABLE.

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

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One QS train inoperable.	A.1 Restore QS train to OPERABLE status.	7 days
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3. AND B.2 Be in MODE 5.	6 hours 36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.6.1	Verify each QS manual, power operated, and automatic valve in the flow path that is not locked, sealed, or otherwise secured in position is in the correct position.	31 days
SR 3.6.6.2	Verify each QS pump's developed head at the flow test point is greater than or equal to the required developed head.	In accordance with the Inservice Testing Program

3.6 CONTAINMENT SYSTEMS

3.6.8 Chemical Addition System

LCO 3.6.8 The Chemical Addition System shall be OPERABLE.

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

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Chemical Addition System inoperable.	A.1 Restore Chemical Addition System to OPERABLE status.	7 days
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	6 hours
	AND	
	B.2 Be in MODE 5.	84 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.8.1	Verify each Chemical Addition System manual, power operated, and automatic valve in the flow path that is not locked, sealed, or otherwise secured in position is in the correct position.	31 days
SR 3.6.8.2	Verify chemical addition tank solution volume is ≥ 4800 gal and ≤ 5500 gal.	184 days
SR 3.6.8.3	Verify chemical addition tank NaOH solution concentration is ≥ 12% and ≤ 13% by weight.	184 days

3.7 PLANT SYSTEMS

3.7.5 Auxiliary Feedwater (AFW) System

LCO 3.7.5 Three AFW trains shall be OPERABLE.

----------------------------- NOTE -----------------------------
Only one AFW train, which includes a motor driven pump, is required to be OPERABLE in MODE 4.

APPLICABILITY: MODES 1, 2, and 3,
MODE 4 when steam generator is relied upon for heat removal.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One steam supply to turbine driven AFW pump inoperable.	A.1 Restore steam supply to OPERABLE status.	7 days AND 14 days from discovery of failure to meet the LCO
B. One AFW train inoperable in MODE 1, 2 or 3 for reasons other than Condition A.	B.1 Restore AFW train to OPERABLE status.	7 days AND 14 days from discovery of failure to meet the LCO

B 3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

B 3.5.2 ECCS—Operating

BASES

BACKGROUND

The function of the ECCS is to provide core cooling and negative reactivity to ensure that the reactor core is protected after any of the following accidents:

a. Loss of coolant accident (LOCA), coolant leakage greater than the capability of the normal charging system;

b. Rupture of a control rod drive mechanism-control rod assembly ejection accident;

c. Loss of secondary coolant accident, including uncontrolled steam release or loss of feedwater; and

d. Steam generator tube rupture (SGTR).

The addition of negative reactivity is designed primarily for the MSLB where primary cooldown could add enough positive reactivity to achieve criticality and return to significant power.

There are three phases of ECCS operation: injection, cold leg recirculation, and hot leg recirculation. In the injection phase, water is taken from the refueling water storage tank (RWST) and injected into the Reactor Coolant System (RCS) through the cold legs. When sufficient water is removed from the RWST to ensure that enough boron has been added to maintain the reactor subcritical and the containment sumps have enough water to supply the required net positive suction head to the ECCS pumps, suction is switched to the containment sump for cold leg recirculation. Within approximately 5 hours, the ECCS flow is shifted to the hot leg recirculation phase to provide a backflush, which would reduce the boiling in the top of the core and any resulting boron precipitation.

Each ECCS train consists of two separate subsystems: High Head Safety Injection (HHSI) and Low Head Safety Injection (LHSI). Two redundant, 100% capacity trains are provided. The ECCS accumulators and the RWST are also part of the ECCS, but are not considered part of an ECCS flow path as described by this LCO.

(continued)

BASES

LCO (continued)

The flow path for each train must maintain its designed independence to ensure that no single failure can disable both ECCS trains.

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

APPLICABILITY

In MODES 1, 2, and 3, the ECCS OPERABILITY requirements for the limiting Design Basis Accident, a large break LOCA, are based on full power operation. Although reduced power would not require the same level of performance, the accident analysis does not provide for reduced cooling requirements in the lower MODES. MODE 2 and MODE 3 requirements are bounded by the MODE 1 analysis.

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

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

ACTIONS

A.1

With one LHSI subsystem train inoperable, the LHSI subsystem train must be returned to OPERABLE status within 7 days. In this condition the remaining OPERABLE ECCS train is adequate to perform the heat removal function. The 7-day Completion Time is reasonable to perform maintenance on the inoperable LHSI subsystem. The 7-day Completion Time is based on the findings of a plant specific deterministic and probabilistic analysis.

(continued)

BASES

ACTIONS

B.1

With one or more trains inoperable for reasons other than Condition A, and at least 100% of the ECCS flow equivalent to a single OPERABLE ECCS train available, the inoperable components must be returned to OPERABLE status within 72 hours. The 72 hour Completion Time is based on an NRC reliability evaluation (Ref. 5) and is a reasonable time for repair of many ECCS components.

An ECCS train is inoperable if it is not capable of delivering design flow to the RCS. Individual components are inoperable if they are not capable of performing their design function or supporting systems are not available.

The LCO requires the OPERABILITY of a number of independent subsystems. Due to the redundancy of trains and the diversity of subsystems, the inoperability of one active component in a train does not render the ECCS incapable of performing its function. Neither does the inoperability of two different components, each in a different train, necessarily result in a loss of function for the ECCS (e.g., an inoperable HHSI pump in one train, and an inoperable LHSI pump in the other). This allows increased flexibility in unit operations under circumstances when components in opposite trains are inoperable.

An event accompanied by a loss of offsite power and the failure of an EDG can disable one ECCS train until power is restored. A reliability analysis (Ref. 5) has shown that the impact of having one full ECCS train inoperable is sufficiently small to justify continued operation for 72 hours.

C.1 and C.2

If the inoperable trains cannot be returned to OPERABLE status within the associated Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to MODE 3 within 6 hours and MODE 4 within 12 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

BASES

ACTIONS (continued)

D.1

Condition B is applicable with one or more trains inoperable for reasons other than Condition A. The allowed Completion Time is based on the assumption that at least 100% of the ECCS flow equivalent to a single OPERABLE ECCS train is available. With less than 100% of the ECCS flow equivalent to a single OPERABLE ECCS train available, the facility is in a condition outside of the accident analyses. Therefore, LCO 3.0.3 must be entered immediately.

SURVEILLANCE REQUIREMENTS

SR 3.5.2.1

Verification of proper valve position ensures that the flow path from the ECCS pumps to the RCS is maintained. Misalignment of these valves could render both ECCS trains inoperable. Securing these valves in position by removal of power or by key locking the control in the correct position ensures that they cannot change position as a result of an active failure or be inadvertently misaligned. These valves are of the type that can disable the function of both ECCS trains and invalidate the accident analyses. A 12 hour Frequency is considered reasonable in view of other administrative controls that will ensure a mispositioned valve is unlikely.

SR 3.5.2.2

Verifying the correct alignment for manual, power operated, and automatic valves in the ECCS flow paths provides assurance that the proper flow paths will exist for ECCS operation. This SR does not apply to valves that are locked, sealed, or otherwise secured in position, since these were verified to be in the correct position prior to locking, sealing, or securing. A valve that receives an actuation signal is allowed to be in a nonaccident position provided the valve will automatically reposition within the proper stroke time. This Surveillance does not require any testing or valve manipulation. Rather, it involves verification that those valves capable of being mispositioned are in the correct position. The 31 day Frequency is appropriate because the valves are operated under administrative control, and an improper valve position would only affect a single train. This Frequency has been shown to be acceptable through operating experience.

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.5.2.3

With the exception of the operating charging pump, the ECCS pumps are normally in a standby nonoperating mode. As such, some flow path piping has the potential to develop pockets of entrained gases. Plant operating experience and analysis has shown that after proper system filling (following maintenance or refueling outages), some entrained noncondensable gases remain. These gases will form small voids, which remain stable in the system in both normal and transient operation. Mechanisms postulated to increase the void size are gradual in nature, and the system is operated in accordance with procedures to preclude growth in these voids.

To provide additional assurances that the system will function, a verification is performed every 92 days that the system is sufficiently full of water. The system is sufficiently full of water when the voids and pockets of entrained gases in the ECCS piping are small enough in size and number so as to not interfere with the proper operation of the ECCS. Verification that the ECCS piping is sufficiently full of water can be performed by venting the necessary high point ECCS vents outside containment, using NDE, or using other Engineering-justified means. Maintaining the piping from the ECCS pumps to the RCS sufficiently full of water ensures that the system will perform properly, injecting its full capacity into the RCS upon demand. This will also prevent water hammer, pump cavitation, and pumping of excess noncondensable gas (e.g., air, nitrogen, or hydrogen) into the reactor vessel following an SI signal or during shutdown cooling. The 92 day frequency takes into consideration the gradual nature of the postulated void generation mechanism.

SR 3.5.2.4

Periodic surveillance testing of ECCS pumps is required by the ASME Code. This type of testing may be accomplished by measuring the pump developed head at only one point of the pump characteristic curve. This testing is performed at low flow conditions during quarterly tests and near design flow conditions at least once every 24 months, as required by the Code. The quarterly test will detect gross degradation caused by impeller structural damage or other hydraulic component problems, but is not a good indicator of expected pump performance at high flow conditions. Both tests verify

(continued)

SURVEILLANCE REQUIREMENTS

SR 3.5.2.4 (continued)

that the measured performance is within an acceptable tolerance of the original pump baseline performance. Additionally, the 24-month comprehensive test verifies that the test flow is greater than or equal to the performance assumed in the safety analysis. Due to limitations in system design, the 24-month test is performed during refueling outages. SRs are specified in the Inservice Testing Program, which encompasses the ASME Code. The ASME Code provides the activities and Frequencies necessary to satisfy the requirements.

SR 3.5.2.5 and SR 3.5.2.6

These Surveillances demonstrate that each automatic ECCS valve actuates to the required position on an actual or simulated SI signal and that each ECCS pump capable of starting automatically starts on receipt of an actual or simulated SI signal. This Surveillance is not required for valves that are locked, sealed, or otherwise secured in the required position under administrative controls. The 18 month Frequency is based on the need to perform these Surveillances under the conditions that apply during a unit outage and the potential for unplanned unit transients if the Surveillances were performed with the reactor at power.

The 18 month Frequency is also acceptable based on consideration of the design reliability (and confirming operating experience) of the equipment. The actuation logic is tested as part of ESF Actuation System testing, and equipment performance is monitored as part of the Inservice Testing Program.

SR 3.5.2.7

Proper throttle valve position is necessary for proper ECCS performance and to prevent pump runout and subsequent component damage. The Surveillance verifies each listed ECCS throttle valve is secured in the correct position. The 18 month Frequency is based on the same reasons as those stated in SR 3.5.2.5 and SR 3.5.2.6.

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.5.2.8

Periodic inspections of the containment sump suction inlet ensure that it is unrestricted and stays in proper operating condition. The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a unit outage and on the need to have access to the location. This Frequency has been found to be sufficient to detect abnormal degradation and is confirmed by operating experience.

REFERENCES

1. UFSAR, Section 3.1.31.
2. 10 CFR 50.46.
3. UFSAR, Section 15.4.1.
4. UFSAR, Section 6.2 and Chapter 15.
5. NRC Memorandum to V. Stello, Jr., from R.L. Baer, "Recommended Interim Revisions to LCOs for ECCS Components," December 1, 1975.

BASES

LCO (continued)

Each QS train includes a spray pump, a dedicated spray header, nozzles, valves, piping, instruments, and controls to ensure an OPERABLE flow path capable of taking suction from the RWST.

APPLICABILITY

In MODES 1, 2, 3, and 4, a DBA could cause a release of radioactive material to containment and an increase in containment pressure and temperature requiring the operation of the QS System.

In MODES 5 and 6, the probability and consequences of these events are reduced due to the pressure and temperature limitations of these MODES. Thus, the QS System is not required to be OPERABLE in MODE 5 or 6.

ACTIONS

A.1

If one QS train is inoperable, it must be restored to OPERABLE status within 7 days. The components available in this degraded condition are capable of providing 100% of the heat removal and iodine removal needs after an accident. The 7-day Completion Time is based on a plant specific deterministic and probabilistic analysis.

B.1 and B.2

If the Required Action and associated Completion Time are not met, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

SURVEILLANCE REQUIREMENTS

SR 3.6.6.1

Verifying the correct alignment of manual, power operated, and automatic valves, excluding check valves, in the QS System provides assurance that the proper flow path exists for QS System operation. This SR does not apply to valves that are locked, sealed, or otherwise secured in position, since they were verified to be in the correct position prior to being secured. This SR does not require any testing or

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.6.6.1 (continued)

valve manipulation. Rather, it involves verification, through a system walkdown, that those valves outside containment and capable of potentially being mispositioned are in the correct position.

SR 3.6.6.2

Verifying that each QS pump's developed head at the flow test point is greater than or equal to the required developed head ensures that QS pump performance is consistent with the safety analysis assumptions. Flow and differential head are normal tests of centrifugal pump performance required by the ASME Code (Ref. 4). Since the QS System pumps cannot be tested with flow through the spray headers, they are tested on recirculation flow. This test confirms one point on the pump design curve and is indicative of overall performance. Such inservice tests confirm component OPERABILITY, trend performance, and detect incipient failures by indicating abnormal performance. The Frequency of this SR is in accordance with the Inservice Testing Program.

SR 3.6.6.3 and SR 3.6.6.4

These SRs ensure that each QS automatic valve actuates to its correct position and each QS pump starts upon receipt of an actual or simulated Containment Pressure high-high signal. This Surveillance is not required for valves that are locked, sealed, or otherwise secured in the required position under administrative controls. The 18 month Frequency is based on the need to perform these Surveillances under the conditions that apply during a unit outage and the potential for an unplanned transient if the Surveillances were performed with the reactor at power. Operating experience has shown that these components usually pass the Surveillances when performed at an 18 month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

SR 3.6.6.5

With the quench spray inlet valves closed and the spray header drained of any solution, low pressure air or smoke can be blown through test connections or an inspection of the nozzles can be performed. This SR ensures that each spray nozzle is unobstructed and that spray coverage of the

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.6.6.5 (continued)

containment during an accident is not degraded. Due to the passive nature of the design of the nozzle and the non-corrosive design of the system, a test performed following maintenance which could result in nozzle blockage is considered adequate to detect obstruction of the nozzles.

REFERENCES

1. UFSAR, Section 6.2.
2. 10 CFR 50.49.
3. 10 CFR 50, Appendix K.
4. ASME Code for Operation and Maintenance of Nuclear Power Plants.

BASES

LCO (continued)

In addition, it is essential that valves in the Chemical Addition System flow paths are properly positioned and that automatic valves are capable of activating to their correct positions.

APPLICABILITY

In MODES 1, 2, 3, and 4, a DBA could cause a release of radioactive material to containment requiring the operation of the Chemical Addition System. The Chemical Addition System assists in reducing the iodine fission product inventory prior to release to the environment.

In MODES 5 and 6, the probability and consequences of these events are reduced due to the pressure and temperature limitations in these MODES. Thus, the Chemical Addition System is not required to be OPERABLE in MODE 5 or 6.

ACTIONS

A.1

If the Chemical Addition System is inoperable, it must be restored to OPERABLE within 7 days. The pH adjustment of the Quench Spray System flow for iodine removal enhancement is reduced in this condition. The Quench Spray System would still be available and would remove some iodine from the containment atmosphere in the event of a DBA. The 7-day Completion Time takes into account the ability of the Quench Spray System to remove iodine at a reduced capability using the redundant Quench Spray flow path capabilities and the low probability of the worst case DBA occurring during this period. The 7-day Completion Time is justified by a plant specific deterministic and qualitative risk assessment.

B.1 and B.2

If the Chemical Addition System cannot be restored to OPERABLE status within the required Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to MODE 5 within 84 hours. The allowed Completion Time of 6 hours is reasonable, based on operating experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging unit systems. The extended interval to reach MODE 5 allows 48 hours for restoration of the Chemical Addition System in MODE 3 and 36 hours to reach MODE 5. This is reasonable when

(continued)

BASES

ACTIONS

B.1 and B.2 (continued)

considering the reduced pressure and temperature conditions in MODE 3 for the release of radioactive material from the Reactor Coolant System.

SURVEILLANCE REQUIREMENTS

SR 3.6.8.1

Verifying the correct alignment of Chemical Addition System manual, power operated, and automatic valves in the chemical addition flow path provides assurance that the system is able to provide additive to the Quench Spray System in the event of a DBA. This SR does not apply to valves that are locked, sealed, or otherwise secured in position, since these valves were verified to be in the correct position prior to locking, sealing, or securing. This SR does not require any testing or valve manipulation. Rather, it involves verification, through a system walkdown, that those valves outside containment and capable of potentially being mispositioned are in the correct position.

SR 3.6.8.2

To provide effective iodine removal, the containment spray must be an alkaline solution. Since the RWST contents are normally acidic, the volume of the chemical addition tank must provide a sufficient volume of spray additive to adjust pH for all water injected. This SR is performed to verify the availability of sufficient NaOH solution in the Chemical Addition System. The 184 day Frequency was developed based on the low probability of an undetected change in tank volume occurring during the SR interval (the tank is isolated during normal unit operations). Tank level is also indicated and alarmed in the control room, so that there is high confidence that a substantial change in level would be detected.

SR 3.6.8.3

This SR provides verification, by chemical analysis, of the NaOH concentration in the chemical addition tank and is sufficient to ensure that the spray solution being injected into containment is at the correct pH level. The 184 day Frequency is sufficient to ensure that the concentration level of NaOH in the chemical addition tank remains within the established limits. This is based on the low likelihood

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.6.8.3 (continued)

of an uncontrolled change in concentration (the tank is normally isolated) and the probability that any substantial variance in tank volume will be detected.

SR 3.6.8.4

This SR provides verification that each automatic valve in the Chemical Addition System flow path actuates to its correct position. This Surveillance is not required for valves that are locked, sealed, or otherwise secured in the required position under administrative controls. The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a unit 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. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

SR 3.6.8.5

To ensure that the correct pH level is established in the borated water solution provided by the Quench Spray System, flow from the Chemical Addition System is verified once every 5 years by draining solution from the RWST and chemical addition tank through the drain lines in the cross-connection between the tanks. This SR provides assurance that the correct amount of NaOH will be metered into the flow path upon Quench Spray System initiation. Due to the passive nature of the chemical addition flow controls, the 5 year Frequency is sufficient to identify component degradation that may affect flow rate.

REFERENCES

None

BASES

LCO (continued)

steam supplies from each of two main steam supply paths through MS-TV-111A and MS-TV-111B (Unit 1), MS-TV-211A and MS-TV-211B (Unit 2), which receive steam from at least two of the three main steam lines upstream of the MSTVs. The piping, valves, instrumentation, and controls required to perform the safety function in the required flow paths also are required to be OPERABLE.

The LCO is modified by a Note indicating that one AFW train, which includes a motor driven pump, is required to be OPERABLE in MODE 4 when the steam generator is relied upon for heat removal. This is because of the reduced heat removal requirements and short period of time in MODE 4 during which the AFW is required and the insufficient steam available in MODE 4 to power the turbine driven AFW pump.

APPLICABILITY

In MODES 1, 2, and 3, the AFW System is required to be OPERABLE in the event that it is called upon to function when the MFW is lost. In addition, the AFW System is required to supply enough makeup water to replace the steam generator secondary inventory, lost as the unit cools to MODE 4 conditions.

In MODE 4 one AFW train is required to be OPERABLE when the steam generator(s) is relied upon for heat removal.

In MODE 5 or 6, the steam generators are not normally used for heat removal, and the AFW System is not required.

ACTIONS

A.1

If one of the two steam supplies, MS-TV-111A and MS-TV-111B (Unit 1), MS-TV-211A and MS-TV-211B (Unit 2), to the turbine driven AFW train is inoperable action must be taken to restore the steam supply to OPERABLE status within 7 days. The 7 day Completion Time is reasonable, since there is a redundant steam supply line for the turbine driven pump, the availability of redundant OPERABLE motor driven AFW pumps; and due to the low probability of an event requiring the use of the turbine driven AFW pump.

The second Completion Time for Required Action A.1 establishes a limit on the maximum time allowed for any combination of Conditions during any contiguous failure to meet this LCO.

BASES

ACTIONS

A.1 (continued)

The 14 day Completion Time provides a limitation time allowed in this specified Condition after discovery of failure to meet the LCO. This limit is considered reasonable for situations in which Conditions A and B are entered concurrently. The AND connector between 7 days and 14 days dictates that both Completion Times apply simultaneously, and the more restrictive must be met.

B.1

With one of the required AFW trains (pump or flow path) inoperable in MODE 1, 2, or 3 for reasons other than Condition A, action must be taken to restore the AFW train to OPERABLE status within 7 days. This Condition includes the loss of two steam supply lines to the turbine driven AFW pump. The 7-day Completion Time is based on a plant specific deterministic and probabilistic analysis.

The second Completion Time for Required Action B.1 establishes a limit on the maximum time allowed for any combination of Conditions to be inoperable during any contiguous failure to meet this LCO.

The 14 day Completion Time provides a limitation time allowed in this specified Condition after discovery of failure to meet the LCO. This limit is considered reasonable for situations in which Conditions A and B are entered concurrently. The AND connector between 7 days and 14 days dictates that both Completion Times apply simultaneously, and the more restrictive must be met.

The 7-day Completion Time is reasonable to perform maintenance on the inoperable AFW train. The 7-day Completion Time is based on a plant specific deterministic and probabilistic assessment consistent with RG 1.177. Based on the results of the RG 1.177 Tier 2 risk assessment the following systems or equipment is required to be available on the affected unit for entries into the 7-day Completion Time for planned maintenance: (1) both low head safety injection trains, (2) both high head safety injection trains including all three charging pumps, (3) both pressurizer PORVs and associated block valves, and (4) both emergency diesel generators. In addition, the Alternate AC Diesel and charging cross-connect capability are also required to be available for planned maintenance entries into the 7-day

(continued)

BASES

ACTIONS

B.1 (continued)

Completion Time. Any unanticipated unavailability of this equipment during the 7-day Completion Time will be assessed in accordance with the 10 CFR 50.65(a)(4) program.

Entry into Condition B.1 is typical for planned maintenance and surveillance. For planned maintenance or surveillance activities the plant configuration will be assessed with the 10 CFR 50.65(a)(4) program prior to entering the Condition to avoid risk significant plant configuration.

C.1 and C.2

When Required Action A.1 or B.1 cannot be completed within the required Completion Time, or if two AFW trains are inoperable in MODE 1, 2, or 3, the unit must be placed in a MODE in which the LCO does not apply. To achieve this status, the unit must be placed in at least MODE 3 within 6 hours, and in MODE 4 within 18 hours.

The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

In MODE 4, when the steam generator is relied upon for heat removal, with two AFW trains inoperable, operation is allowed to continue because only one motor driven pump AFW train is required in accordance with the Note that modifies the LCO. Although not required, the unit may continue to cool down and initiate RHR.

D.1

If all three AFW trains are inoperable in MODE 1, 2, or 3, the unit is in a seriously degraded condition with no safety related means for conducting a cooldown, and only limited means for conducting a cooldown with nonsafety related equipment. In such a condition, the unit should not be perturbed by any action, including a power change, that might result in a trip. The seriousness of this condition requires that action be started immediately to restore one AFW train to OPERABLE status.

(continued)

BASES

ACTIONS

D.1 (continued)

Required Action D.1 is modified by a Note indicating that all required MODE changes or power reductions required by the Technical Specifications are suspended until one AFW train is restored to OPERABLE status. In this case, LCO 3.0.3 is not applicable because it could force the unit into a less safe condition.

E.1

In MODE 4, either the reactor coolant pumps or the RHR loops can be used to provide forced circulation. This is addressed in LCO 3.4.6, "RCS Loops—MODE 4." With the required AFW train inoperable, action must be taken to immediately restore the inoperable train to OPERABLE status. The immediate Completion Time is consistent with LCO 3.4.6.

SURVEILLANCE REQUIREMENTS

SR 3.7.5.1

Verifying the correct alignment for manual, power operated, and automatic valves in the AFW System water and steam supply flow paths provides assurance that the proper flow paths will exist for AFW operation. This SR does not apply to valves that are locked, sealed, or otherwise secured in position, since they are verified to be in the correct position prior to locking, sealing, or securing. This SR also does not apply to valves that cannot be inadvertently misaligned, such as check valves. This Surveillance does not require any testing or valve manipulation; rather, it involves verification that those valves capable of being mispositioned are in the correct position.

The 31 day Frequency is based on engineering judgment, is consistent with the procedural controls governing valve operation, and ensures correct valve positions.

SR 3.7.5.2

Verifying that each AFW pump's developed head at the flow test point is greater than or equal to the required developed head ensures that AFW pump performance has not degraded during the cycle. Flow and differential head are normal tests of centrifugal pump performance required by the ASME Code (Ref 2). Because it is sometimes undesirable to introduce cold AFW into the steam generators while they are

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.7.5.2 (continued)

operating, this testing is typically performed on recirculation flow. This test confirms one point on the pump design curve and is indicative of overall performance. Such inservice tests confirm component OPERABILITY, trend performance, and detect incipient failures by indicating abnormal performance. Performance of inservice testing discussed in the ASME Code (Ref. 2) (only required at 3 month intervals) satisfies this requirement.

This SR is modified by a Note indicating that the SR should be deferred until suitable test conditions are established. This deferral is required because there may be insufficient steam pressure to perform the test.

SR 3.7.5.3

This SR verifies that AFW can be delivered to the appropriate steam generator in the event of any accident or transient that generates an ESFAS, by demonstrating that each automatic valve in the flow path actuates to its correct position on an actual or simulated actuation signal. This Surveillance is not required for valves that are locked, sealed, or otherwise secured in the required position under administrative controls. The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a unit outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. The 18 month Frequency is acceptable based on operating experience and the design reliability of the equipment.

This SR is modified by a Note that states the SR is not required in MODE 4. In MODE 4, the heat removal requirements would be less providing more time for operator action to manually align the required valves.

SR 3.7.5.4

This SR verifies that the AFW pumps will start in the event of any accident or transient that generates an ESFAS by demonstrating that each AFW pump starts automatically on an actual or simulated actuation signal in MODES 1, 2, and 3. In MODE 4, the required pump's autostart function is not required. The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.7.5.4 (continued)

during a unit outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power.

This SR is modified by two Notes. Note 1 indicates that the SR be deferred until suitable test conditions are established. This deferral is required because there may be insufficient steam pressure to perform the test. Note 2 states that the SR is not required in MODE 4. In MODE 4, the heat removal requirements would be less providing more time for operator action to manually start the required AFW pump.

SR 3.7.5.5

This SR verifies that the AFW is properly aligned by verifying the flow paths from the ECST to each steam generator prior to entering MODE 3 after more than 30 contiguous days in any combination of MODES 5, 6, or defueled. OPERABILITY of AFW flow paths must be verified before sufficient core heat is generated that would require the operation of the AFW System during a subsequent shutdown. The Frequency is reasonable, based on engineering judgement and other administrative controls that ensure that flow paths remain OPERABLE. To further ensure AFW System alignment, flow path OPERABILITY is verified following extended outages to determine no misalignment of valves has occurred. This SR ensures that the flow path from the ECST to the steam generators is properly aligned.

REFERENCES

1. UFSAR, Section 10.4.3.2.

2. ASME Code for Operation and Maintenance of Nuclear Power Plants.