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TSB2 - TECHNICAL SPECIFICATIONS BASES UNIT 2 MANUAL

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# SSES MANUAL

Manual Name: TSB2

Manual Title: TECHNICAL SPECIFICATIONS BASES UNIT 2 MANUAL

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## B 3.3 INSTRUMENTATION

### B 3.3.5.1 Emergency Core Cooling System (ECCS) Instrumentation

#### BASES

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##### BACKGROUND

The purpose of the ECCS instrumentation is to initiate appropriate responses from the systems to ensure that the fuel is adequately cooled in the event of a design basis accident or transient.

For most anticipated operational occurrences and Design Basis Accidents (DBAs), a wide range of dependent and independent parameters are monitored.

The ECCS instrumentation actuates core spray (CS), low pressure coolant injection (LPCI), high pressure coolant injection (HPCI), Automatic Depressurization System (ADS), the diesel generators (DGs) and other features described in the DG background. The equipment involved with each of these systems with exception of the DGs and other features, is described in the Bases for LCO 3.5.1, "ECCS—Operating."

##### Core Spray System

The CS System may be initiated by either automatic or manual means. Automatic initiation occurs for conditions of Reactor Vessel Water Level Low, Low, Low, Level 1 or Drywell Pressure - High concurrent with Reactor Pressure - Low. Each of these diverse variables is monitored by four redundant instruments. The initiation logic for one CS loop is arranged in a one-out-of-two-twice network using level and pressure instruments which will generate a signal when:

- (1) both level sensors are tripped, or
- (2) two high drywell pressure sensors and two low reactor vessel pressure sensors are tripped, or
- (3) a combination of one channel of level sensor and one of the other channels of high drywell pressure sensor together with its associated low reactor vessel pressure sensor (i.e., Channel A level sensor and Channel C high drywell pressure sensor and low reactor vessel pressure sensor).

(continued)

## BASES

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### **BACKGROUND**

#### Core Spray System (continued)

Once an initiation signal is received by the CS control circuitry, the signal is sealed in until manually reset. The logic can also be initiated by use of a manual push button (one push button per subsystem). Upon receipt of an initiation signal, the CS pumps are started 15 seconds after initiation signal if normal offsite power is available and 10.5 seconds after diesel generator power is available.

The CS test line isolation valve, which is also a primary containment isolation valve (PCIV), is closed on a CS initiation signal to allow full system flow assumed in the accident analyses and maintain primary containment isolated. The CS System also monitors the pressure in the reactor to ensure that, before the injection valves open, the reactor pressure has fallen to a value below the CS System's maximum design pressure. The variable is monitored by four redundant instruments. The instrument outputs are connected to relays whose contacts are arranged in a one-out-of-two taken twice logic.

#### Low Pressure Coolant Injection System

The LPCI is an operating mode of the Residual Heat Removal (RHR) System, with two LPCI subsystems. The LPCI subsystems may be initiated by automatic or manual means. Automatic initiation occurs for conditions of Reactor Vessel Water Level Low, Low, Low, Level 1 or Drywell Pressure - High concurrent with Reactor Pressure - Low. Each of these diverse variables is monitored by four instruments in two divisions. Each division is arranged in a one-out-of-two-taken twice network using level and pressure instruments which will generate a signal when:

- (1) both level sensors are tripped, or
- (2) two high drywell pressure sensors and two low reactor vessel pressure sensors are tripped, or
- (3) a combination of one channel of level sensor and one of the other channel of high drywell pressure sensor together with its associated low reactor vessel pressure sensor (i.e., Channel A level sensor and Channel C high drywell and low reactor vessel pressure sensor).

(continued)



## **BASES**

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### **BACKGROUND**

#### **Low Pressure Coolant Injection System (continued)**

The initiation logic is cross connected between divisions (i.e., either start signal will start all four pumps and open both loop's injection valves). Once an initiation signal is received by the LPCI control circuitry, the signal is sealed in until manually reset. The cross division start signals for the pumps affect both the opposite division's start logic and the pump's 4KV breaker start logic. The cross division start signal to the opposite division's start logic is for improved reliability. The cross division start signals to the pump's 4KV breaker start logic is needed to ensure specific control power failures do not prevent the start of an adequate number of LPCI pumps.

Upon receipt of an initiation signal, all LPCI pumps start after a 3 second time delay when normal AC power is lost and standby diesel generator power is available. If normal power is available, LPCI pumps A and B will start immediately and pumps C and D will start 7.0 seconds after initiation signal to limit loading of the offsite sources.

The RHR test line and spray line are also isolated on a LPCI initiation signal to allow the full system flow assumed in the accident analyses and for those valves which are also PCIVs maintain primary containment isolated.

The LPCI System monitors the pressure in the reactor to ensure that, before an injection valve opens, the reactor pressure has fallen to a value below the LPCI System's maximum design pressure. The variable is monitored by four redundant instruments. The instrument outputs are connected to relays whose contacts are arranged in a one-out-of-two taken twice logic.

Logic is provided to close the recirculation pump discharge valves to ensure that LPCI flow does not bypass the core when it injects into the recirculation lines. The logic consists of an initiation signal (Low reactor water level and high drywell pressure in a one out of two taken twice logic) from both divisions of LPCI instruments and a pressure permissive. The pressure variable is monitored by four redundant instruments. The instrument outputs are connected to relays whose contacts are arranged in a one-out-of-two taken twice logic.

(continued)

**BASES**

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**BACKGROUND  
(continued)**

**High Pressure Coolant Injection System**

The HPCI System may be initiated by either automatic or manual means. Automatic initiation occurs for conditions of Reactor Vessel Water Level—Low Low, Level 2 or Drywell Pressure—High. Each of these variables is monitored by four redundant instruments. The instrument outputs are connected to relays whose contacts are arranged in a one-out-of-two taken twice logic for each Function.

The HPCI System also monitors the water level in the condensate storage tank (CST). HPCI suction is normally maintained on the CST until it transfers to the suppression pool on low CST level or is manually transferred by the operator. Reactor grade water in the CST is the normal source. Upon receipt of a HPCI initiation signal, the CST suction valve is automatically signaled to open (it is normally in the open position) unless the suppression pool suction valve is open. If the water level in the CST falls below a preselected level, first the suppression pool suction valve automatically opens, and then the CST suction valve automatically closes. Two level switches are used to detect low water level in the CST. Either switch can cause the suppression pool suction valve to open and the CST suction valve to close. To prevent losing suction to the pump, the suction valves are interlocked so that one suction path must be open before the other automatically closes.

The HPCI provides makeup water to the reactor until the reactor vessel water level reaches the Reactor Vessel Water Level—High, Level 8 trip, at which time the HPCI turbine trips, which causes the turbine's stop valve, minimum flow valve, the cooling water isolation valve, and the injection valve to close. The logic is two-out-of-two to provide high reliability of the HPCI System. The HPCI System automatically restarts if a Reactor Vessel Water Level—Low Low, Level 2 signal is subsequently received.

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## **BASES**

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### **BACKGROUND (continued)**

#### **Automatic Depressurization System**

The ADS may be initiated by either automatic or manual means. Automatic initiation occurs when signals indicating Reactor Vessel Water Level—Low Low Low, Level 1; Drywell Pressure—High or ADS Drywell Bypass Actuation Timer; confirmed Reactor Vessel Water Level—Low, Level 3; and CS or LPCI Pump Discharge Pressure—High are all present and the ADS Initiation Timer has timed out. There are two instruments each for Reactor Vessel Water Level—Low Low Low, Level 1 and Drywell Pressure—High, and one instrument for confirmed Reactor Vessel Water Level—Low, Level 3 in each of the two ADS trip systems. Each of these instruments drives a relay whose contacts form the initiation logic.

Each ADS trip system includes a time delay between satisfying the initiation logic and the actuation of the ADS valves. The ADS Initiation Timer time delay setpoint is chosen to be long enough that the HPCI system has sufficient operating time to recover to a level above Level 1, yet not so long that the LPCI and CS Systems are unable to adequately cool the fuel if the HPCI fails to maintain that level. An alarm in the control room is annunciated when either of the timers is timing. Resetting the ADS initiation signals resets the ADS Initiation Timers. The ADS also monitors the discharge pressures of the four LPCI pumps and the four CS pumps. Each ADS trip system includes two discharge pressure permissive instruments from both CS pumps in the division and from either of the two LPCI pumps in the associated Division (i.e., Division 1 LPCI pumps A or C input to ADS trip system A, and Division 2 LPCI pumps B or D input to ADS trip system B). The signals are used as a permissive for ADS actuation, indicating that there is a source of core coolant available once the ADS has depressurized the vessel. With both CS pumps in a division or one of the LPCI pumps operating sufficient flow is available to permit automatic depressurization.

The ADS logic in each trip system is arranged in two strings. Each string has a contact from each of the following variables: Reactor Vessel Water Level—Low Low Low, Level 1; Drywell Pressure—High; or Drywell Pressure Bypass Actuation Timer. One of the two strings in each trip system must also have a confirmed Reactor Vessel Water Level—Low, Level 3. All contacts in both logic strings must close, the ADS initiation timer must time out, and a

(continued)

## BASES

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### BACKGROUND

#### Automatic Depressurization System (continued)

loop of CS or LPCI pump discharge pressure signal must be present to initiate an ADS trip system. Either the A or B trip system will cause all the ADS relief valves to open. Once the Drywell Pressure—High signal, the ADS Drywell Pressure Bypass Actuation Timer, or the ADS initiation signal is present, it is individually sealed in until manually reset.

Manual inhibit switches are provided in the control room for the ADS; however, their function is not required for ADS OPERABILITY (provided ADS is not inhibited when required to be OPERABLE).

#### Diesel Generators and Other Initiated Features

The DGs may be initiated by either automatic or manual means. Automatic initiation occurs for conditions of Reactor Vessel Water Level—Low Low Low, Level 1 or Drywell Pressure—High. The DGs are also initiated upon loss of voltage signals (Refer to the Bases for LCO 3.3.8.1, "Loss of Power (LOP) Instrumentation," for a discussion of these signals.) The initiation logic is arranged in a one-out-of-two-twice network using level and pressure instruments which will generate a signal when:

- (1) both level sensors are tripped, or
- (2) both high drywell pressure sensors are tripped, or
- (3) a combination of one level sensor and one high drywell pressure sensor is tripped.

DGs A and B receive their initiation signal from CS system initiation logic Division I and Division II respectively. DGs C and D receive their initiation signals from either LPCI systems initiation logic Division I or Division II. The DGs can also be started manually from the control room and locally from the associated DG room. The DG initiation signal is a sealed in signal and must be manually reset. The DG initiation logic is reset by resetting the associated ECCS initiation logic. Upon receipt of a loss of coolant accident (LOCA) initiation signal, each DG is automatically

(continued)

## **BASES**

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### **BACKGROUND**

#### **Diesel Generators and Other Initiated Features (continued)**

started, is ready to load in approximately 10 seconds, and will run in standby conditions (rated voltage and speed, with the DG output breaker open). The DGs will only energize their respective Engineered Safety Feature buses if a loss of offsite power occurs. (Refer to Bases for LCO 3.3.8.1.).

In addition to DG initiation, the ECCS instrumentation initiates other design features. Signals from the CS System logic initiate (1) the reset of two Emergency Service Water (ESW) timers, (2) the reset of the degraded grid timers for the 4kV buses on both units, (3) LOCA load shed schemes, and (4) the trip of Drywell Cooling equipment. Signals from the LPCI System logic initiate (1) the reset of two Emergency Service Water (ESW) timers, (2) the trip of turbine building chillers, and (3) the trip of reactor building chillers. The ESW pump timer reset feature assures the ESW pumps do not start concurrently with the CS or LPCI pumps. If one or both ESW pump timer resets in a division or reactor building/turbine building chiller trips are inoperable; two offsite circuits with the 4kV buses aligned to their normal configuration are required to be OPERABLE. If one or both ESW pump timer resets in a division or reactor building/turbine building chiller trips are inoperable; the effects on one offsite circuit have not been analyzed; and therefore, the offsite circuit is assumed not to be capable of accepting the required loads during certain accident events. The ESW pump timer reset is not required in MODES 4 and 5 because concurrent pump starts, on a LOCA signal, of the ESW pumps (initiated by the DG start circuitry) with CS or LPCI pumps cannot occur in these MODES.

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### **APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY**

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

(continued)

## BASES

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APPLICABLE  
SAFETY  
ANALYSES, LCO,  
and APPLICABILITY  
(continued)

ECCS instrumentation satisfies Criterion 3 of the NRC Policy Statement (Ref. 4). Certain instrumentation Functions are retained for other reasons and are described below in the individual Functions discussion.

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

Allowable Values are specified for each ECCS Function specified in the table. Nominal trip setpoints are specified in the setpoint calculations. The nominal setpoints are selected to ensure that the setpoints do not exceed the Allowable Value between CHANNEL CALIBRATIONS. Operation with a trip setpoint less conservative than the nominal trip setpoint, but within its Allowable Value, is acceptable. A channel is inoperable if its actual trip setpoint is not within its required Allowable Value. Trip setpoints are those predetermined values of output at which an action should take place. The setpoints are compared to the actual process parameter (e.g., reactor vessel water level), and when the measured output value of the process parameter reaches the setpoint, the associated device changes state. The analytic limits are derived from the limiting values of the process parameters obtained from the safety analysis. The Allowable Values are derived from the analytic limits, corrected for calibration, process, and some of the instrument errors. The trip setpoints are then determined, accounting for the remaining instrument errors (e.g., drift). The trip setpoints derived in this manner

(continued)

## **BASES**

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**APPLICABLE  
SAFETY ANALYSES  
LCO, and  
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(continued)**

provide adequate protection because instrumentation uncertainties, process effects, calibration tolerances, instrument drift, and severe environment errors (for channels that must function in harsh environments as defined by 10 CFR 50.49) are accounted for.

An exception to the methodology described to derive the Allowable Value is the methodology used to determine the Allowable Values for the ECCS pump start time delays and HPCI CST Level 1 – Low. These Allowable Values are based on system calculations and/or engineering judgement which establishes a conservative limit at which the function should occur.

In general, the individual Functions are required to be OPERABLE in the MODES or other specified conditions that may require ECCS (or DG) initiation to mitigate the consequences of a design basis transient or accident. To ensure reliable ECCS and DG function, a combination of Functions is required to provide primary and secondary initiation signals. The specific Applicable Safety Analyses, LCO, and Applicability discussions are listed below on a Function by Function basis.

### **Core Spray and Low Pressure Coolant Injection Systems**

#### **1.a, 2.a. Reactor Vessel Water Level—Low Low Low, Level 1**

Low reactor pressure vessel (RPV) water level indicates that the capability to cool the fuel may be threatened. Should RPV water level decrease too far, fuel damage could result. The low pressure ECCS and associated DGs are initiated at Level 1 to ensure that core spray and flooding functions are available to prevent or minimize fuel damage. The Reactor Vessel Water Level—Low Low Low, Level 1 is one of the Functions assumed to be OPERABLE and capable of initiating the ECCS during the transients analyzed in References 2. In addition, the Reactor Vessel Water Level—Low Low Low, Level 1 Function is directly assumed in the analysis of the recirculation line break (Ref. 1). The core cooling function of the ECCS, along with the scram action of the Reactor Protection System (RPS), ensures that the fuel peak cladding temperature remains below the limits of 10 CFR 50.46.

(continued)

**BASES**

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**APPLICABLE  
SAFETY  
ANALYSES,  
LCO, and  
APPLICABILITY**

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

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

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

The initiation logic for LPCI pumps and injection valves is cross connected such that either division's start signal will start all four pumps and open both loop's injection valves. This cross division logic is required in MODES 1, 2, and 3. In MODES 4 and 5, redundancy in the initiation circuitry is not required. Therefore, in MODES 4 and 5 for LPCI, only one division of initiation logic is required.

DGs C and D which are initiated from the LPCI LOCA initiation are cross connected such that both DGs receive an initiation signal from both Divisions of the LPCI LOCA initiation circuitry. This cross connected logic is only required in MODES 1, 2, and 3. In MODES 4 and 5, redundancy in the DG initiation circuitry is not required. Therefore, in MODES 4 and 5 for DGs C and D only one division of ECCS initiation logic is required.

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

(continued)



**BASES**

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**APPLICABLE  
SAFETY  
ANALYSES,  
LCO, and  
APPLICABILITY  
(continued)**

**1.b, 2.b. Drywell Pressure—High**

High pressure in the drywell could indicate a break in the reactor coolant pressure boundary (RCPB). The low pressure ECCS (provided a concurrent low reactor pressure signal is present) and associated DGs, without a concurrent low reactor pressure signal, are initiated upon receipt of the Drywell Pressure—High Function in order to minimize the possibility of fuel damage. The Drywell Pressure—High Function, along with the Reactor Water Level—Low Low Low, Level 1 Function, is directly assumed in the analysis of the recirculation line break (Ref. 1). The core cooling function of the ECCS, along with the scram action of the RPS, ensures that the fuel peak cladding temperature remains below the limits of 10 CFR 50.46.

High drywell pressure signals are initiated from four pressure instruments that sense drywell pressure. The Allowable Value was selected to be as low as practical and be indicative of a LOCA inside primary containment. The Drywell Pressure—High Function is required to be OPERABLE when the ECCS or DG is required to be OPERABLE in conjunction with times when the primary containment is required to be OPERABLE. Thus, four channels of the CS and LPCI Drywell Pressure—High Function are required to be OPERABLE in MODES 1, 2, and 3 to ensure that no single instrument failure can preclude ECCS and DG initiation. In MODES 4 and 5, the Drywell Pressure—High Function is not required, since there is insufficient energy in the reactor to pressurize the primary containment to Drywell Pressure—High setpoint. Refer to LCO 3.5.1 for Applicability Bases for the low pressure ECCS subsystems and to LCO 3.8.1 for Applicability Bases for the DGs.

**1.c, 1.d, 2.c, 2.d Reactor Steam Dome Pressure—Low**

Low reactor steam dome pressure signals are used as permissives for the low pressure ECCS subsystems. The low reactor pressure permissive is provided to prevent a high drywell pressure condition which is not accompanied by low reactor pressure, i.e. a false LOCA signal, from disabling two RHR pumps on the other unit. The low reactor steam dome pressure permissive also ensures that, prior to opening the injection valves of the low pressure ECCS subsystems, the reactor pressure has fallen to a value below these

(continued)

**BASES**

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**APPLICABLE  
SAFETY  
ANALYSES,  
LCO, and  
APPLICABILITY**

**1.c, 1.d, 2.c, 2.d Reactor Steam Dome Pressure—Low**  
**(continued)**

subsystems' maximum design pressure. The Reactor Steam Dome Pressure—Low is one of the Functions assumed to be OPERABLE and capable of permitting initiation of the ECCS during the transients analyzed in Reference 2. In addition, the Reactor Steam Dome Pressure—Low Function is directly assumed in the analysis of the recirculation line break (Ref. 1). The core cooling function of the ECCS, along with the scram action of the RPS, ensures that the fuel peak cladding temperature remains below the limits of 10 CFR 50.46.

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

The pressure instruments are set to actuate between the Upper and Lower Allowable Values on decreasing reactor dome pressure.

The Upper Allowable Value is low enough to ensure that the reactor dome pressure has fallen to a value below the Core Spray and RHR/LPCI maximum design pressures to preclude overpressurization.

The Lower Allowable Value is high enough to ensure that the ECCS injection prevents the fuel peak cladding temperature from exceeding the limits of 10 CFR 50.46.

DGs C and D which are initiated from the LPCI LOCA initiation are cross connected such that both DGs receive an initiation signal from both Divisions of the LPCI LOCA initiation circuitry. This cross connected logic is only required in MODES 1, 2, and 3. In MODES 4 and 5, redundancy in the DG initiation circuitry is not required. Therefore, in MODES 4 and 5 for DGs C and D only one division of ECCS initiation logic is required.

Four channels of Reactor Steam Dome Pressure—Low Function are required to be OPERABLE only when the ECCS is required to be OPERABLE to ensure that no single instrument failure can preclude ECCS initiation. Refer to LCO 3.5.1 and LCO 3.5.2 for Applicability Bases for the low pressure ECCS subsystems.

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BASES

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APPLICABLE  
SAFETY ANALYSES  
LCO, and  
APPLICABILITY  
(continued)

1.e, 2.f. Manual Initiation

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

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

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

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

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

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

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

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**BASES**

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**APPLICABLE  
SAFETY  
ANALYSES,  
LCO, and  
APPLICABILITY**

**2.e. Reactor Steam Dome Pressure—Low (Recirculation  
Discharge Valve Permissive) (continued)**

Four channels of the Reactor Steam Dome Pressure—Low Function are only required to be OPERABLE in MODES 1, 2, and 3 with the associated recirculation pump discharge valve open. With the valve(s) closed, the function instrumentation has been performed; thus, the Function is not required. In MODES 4 and 5, the loop injection location is not critical since LPCI injection through the recirculation loop in either direction will still ensure that LPCI flow reaches the core (i.e., there is no significant reactor steam dome back pressure).

**HPCI System**

**3.a Reactor Vessel Water Level - Low Low, Level 2**

Low RPV water level indicates that the capability to cool the fuel may be threatened. Should RPV water level decrease too far, fuel damage could result. Therefore, the HPCI System is initiated at Level 2 to maintain level above the top of the active fuel. The Reactor Vessel Water Level—Low Low, Level 2 is one of the Functions assumed to be OPERABLE analyzed in Reference 2. Additionally, the Reactor Vessel Water Level—Low Low, Level 2 Function associated with HPCI is directly assumed in the analysis of the recirculation line break (Ref. 2).

The core cooling function of the ECCS, along with the scram action of the RPS, ensures that the fuel peak cladding temperature remains below the limits of 10 CFR 50.46.

Reactor Vessel Water Level—Low Low, Level 2 signals are initiated from four level instruments that sense the difference between the pressure due to a constant column of water (reference leg) and the pressure due to the actual water level (variable leg) in the vessel.

The HPCI Reactor Vessel Water Level—Low Low, Level 2 Allowable Value is chosen to be consistent with the Reactor Core Isolation Cooling (RCIC) System Reactor Vessel Water Level - Low Low, Level 2 Allowable value.

Four channels of Reactor Vessel Water Level—Low Low, Level 2 Function are required to be OPERABLE only when HPCI is required to be OPERABLE to ensure that no single instrument failure can preclude HPCI initiation. Refer to LCO 3.5.1 for HPCI Applicability Bases.

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**BASES**

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**APPLICABLE  
SAFETY  
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LCO, and  
APPLICABILITY  
(continued)**

**3.b. Drywell Pressure—High**

High pressure in the drywell could indicate a break in the RCPB. The HPCI System is initiated upon receipt of the Drywell Pressure—High Function in order to minimize the possibility of fuel damage. The Drywell Pressure—High Function, along with the Reactor Water Level—Low Low, Level 2 Function, is directly assumed in the analysis of the recirculation line break (Ref. 4). The core cooling function of the ECCS, along with the scram action of the RPS, ensures that the fuel peak cladding temperature remains below the limits of 10 CFR 50.46.

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

Four channels of the Drywell Pressure—High Function are required to be OPERABLE when HPCI is required to be OPERABLE to ensure that no single instrument failure can preclude HPCI initiation. Refer to LCO 3.5.1 for the Applicability Bases for the HPCI System.

**3.c. Reactor Vessel Water Level—High, Level 8**

High RPV water level indicates that sufficient cooling water inventory exists in the reactor vessel such that there is no danger to the fuel. Therefore, the Level 8 signal is used to trip the HPCI turbine to prevent overflow into the main steam lines (MSLs). The Reactor Vessel Water Level—High, Level 8 Function is not assumed in the accident and transient analyses. It was retained since it is a potentially significant contributor to risk.

Reactor Vessel Water Level—High, Level 8 signals for HPCI are initiated from two level instruments. Both Level 8 signals are required in order to trip HPCI. This ensures that no single instrument failure can preclude an HPCI initiation or trip. The Reactor Vessel Water Level—High, Level 8 Allowable Value is chosen to prevent flow from the HPCI System from overflowing into the MSLs.

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**BASES**

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**APPLICABLE  
SAFETY  
ANALYSES, LCO,  
and APPLICABILITY**

**3.c. Reactor Vessel Water Level—High, Level 8 (continued)**

Two channels of Reactor Vessel Water Level—High, Level 8 Function are required to be OPERABLE only when HPCI is required to be OPERABLE. Refer to LCO 3.5.1 and LCO 3.5.2 for HPCI Applicability Bases.

**3.d. Condensate Storage Tank Level—Low**

The Condensate Storage Tank-Low signal indicates that a conservatively calculated NPSH-available limit is being approached.

Normally the suction valves between HPCI and the CST are open and, upon receiving a HPCI initiation signal, water for HPCI injection would be taken from the CST. However, if the water level in the CST falls below a preselected level, first the suppression pool suction valve automatically opens, and then the CST suction valve automatically closes. This ensures that an adequate suction head for the pump and an uninterrupted supply of makeup water is available to the HPCI pump. To prevent losing suction to the pump, the suction valves are interlocked so that the suppression pool suction valves must be open before the CST suction valve automatically closes. The Function is implicitly assumed in the accident and transient analyses (which take credit for HPCI) since the analyses assume that the HPCI suction source is the suppression pool.

Condensate Storage Tank Level—Low signals are initiated from two level instruments. The logic is arranged such that either level switch can cause the suppression pool suction valves to open and the CST suction valve to close. The Condensate Storage Tank Level—Low Function Allowable Value is high enough to ensure adequate pump suction head while water is being taken from the CST.

Two channels of the Condensate Storage Tank Level—Low Function are required to be OPERABLE only when HPCI is required to be OPERABLE to ensure that no single instrument failure can preclude HPCI swap to suppression pool source. Refer to LCO 3.5.1 for HPCI Applicability Bases.

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## BASES

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### 3.e. Manual Initiation

The Manual Initiation push button channel introduces signals into the HPCI logic to provide manual initiation capability and is redundant to the automatic protective instrumentation. There is one push button for the HPCI System.

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**BASES**

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**APPLICABLE  
SAFETY  
ANALYSES, LCO,  
and APPLICABILITY**

**3. e. Manual Initiation (continued)**

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

There is no Allowable Value for this Function since the channel is mechanically actuated based solely on the position of the push button. One channel of the Manual Initiation Function is required to be OPERABLE only when the HPCI System is required to be OPERABLE. Refer to LCO 3.5.1 for HPCI Applicability Bases.

**Automatic Depressurization System**

**4.a, 5.a. Reactor Vessel Water Level—Low Low Low, Level 1**

Low RPV water level indicates that the capability to cool the fuel may be threatened. Should RPV water level decrease too far, fuel damage could result. Therefore, ADS receives one of the signals necessary for initiation from this Function. The Reactor Vessel Water Level—Low Low Low, Level 1 is one of the Functions assumed to be OPERABLE and capable of initiating the ADS during the accident analyzed in Reference 1. The core cooling function of the ECCS, along with the scram action of the RPS, ensures that the fuel peak cladding temperature remains below the limits of 10 CFR 50.46.

Reactor Vessel Water Level—Low Low Low, Level 1 signals are initiated from four level instruments that sense the difference between the pressure due to a constant column of water (reference leg) and the pressure due to the actual water level (variable leg) in the vessel. Four channels of Reactor Vessel Water Level—Low Low Low, Level 1 Function are required to be OPERABLE only when ADS is required to be OPERABLE to ensure that no single instrument failure can preclude ADS initiation. Two channels input to ADS trip system A, while the other two channels input to ADS trip system B. Refer to LCO 3.5.1 for ADS Applicability Bases.

(continued)



**BASES**

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**APPLICABLE  
SAFETY  
ANALYSES,  
LCO, and  
APPLICABILITY**

**4.a, 5.a. Reactor Vessel Water Level—Low Low Low, Level 1  
(continued)**

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

**4.b, 5.b Drywell Pressure – High**

High pressure in the drywell could indicate a break in the RCPB. Therefore, ADS receives one of the signals necessary for initiation from this Function in order to minimize the possibility of fuel damage. The Drywell Pressure—High is assumed to be OPERABLE and capable of initiating the ADS during the accidents analyzed in Reference 2. The core cooling function of the ECCS, along with the scram action of the RPS, ensures that the fuel peak cladding temperature remains below the limits of 10 CFR 50.46.

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

Four channels of Drywell Pressure—High Function are only required to be OPERABLE when ADS is required to be OPERABLE to ensure that no single instrument failure can preclude ADS initiation. Two channels input to ADS trip system A, while the other two channels input to ADS trip system B. Refer to LCO 3.5.1 for ADS Applicability Bases.

**4.c, 5.c. Automatic Depressurization System Initiation  
Timer**

The purpose of the Automatic Depressurization System Initiation Timer is to delay depressurization of the reactor vessel to allow the HPCI System time to maintain reactor vessel water level. Since the rapid depressurization caused by ADS operation is one of the most severe transients on the reactor vessel, its occurrence should be limited. By delaying initiation of the ADS Function, the operator is given the chance to monitor the success or failure of the HPCI System to maintain water level, and then to decide whether or not to allow ADS to initiate, to delay initiation further by

(continued)

**BASES**

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**APPLICABLE  
SAFETY  
ANALYSES,  
LCO, and  
APPLICABILITY**

**4.c, 5.c. Automatic Depressurization System Initiation Timer**  
(continued)

recycling the timer, or to inhibit initiation permanently. The Automatic Depressurization whether or not to allow ADS to initiate, to delay initiation. System Initiation Timer Function is assumed to be OPERABLE for the accident analyses of Reference 1 that require ECCS initiation and assume failure of the HPCI System.

There are two Automatic Depressurization System Initiation Timer relays, one in each of the two ADS trip systems. The Allowable Value for the Automatic Depressurization System Initiation Timer is chosen so that there is still time after depressurization for the low pressure ECCS subsystems to provide adequate core cooling.

Two channels of the Automatic Depressurization System Initiation Timer Function are only required to be OPERABLE when the ADS is required to be OPERABLE to ensure that no single instrument failure can preclude ADS initiation. (One channel inputs to ADS trip system A, while the other channel inputs to ADS trip system B. Refer to LCO 3.5.1 for ADS Applicability Bases.

**4.d, 5.d. Reactor Vessel Water Level—Low, Level 3**

The Reactor Vessel Water Level—Low, Level 3 Function is used by the ADS only as a confirmatory low water level signal. ADS receives one of the signals necessary for initiation from Reactor Vessel Water Level—Low Low Low, Level 1 signals. In order to prevent spurious initiation of the ADS due to spurious Level 1 signals, a Level 3 signal must also be received before ADS initiation commences.

Reactor Vessel Water Level—Low, Level 3 signals are initiated from two level instruments that sense the difference between the pressure due to a constant column of water (reference leg) and the pressure due to the actual water level (variable leg) in the vessel. The Allowable Value for Reactor Vessel Water Level—Low, Level 3 is selected at the RPS Level 3 scram Allowable Value for convenience. Refer to LCO 3.3.1.1, "Reactor Protection System (RPS) Instrumentation," for the Bases discussion of this Function.

(continued)

## **BASES**

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**APPLICABLE  
SAFETY ANALYSES  
LCO, and  
APPLICABILITY**

**4.d, 5.d. Reactor Vessel Water Level-Low, Level 3 (continued)**

Two channels of Reactor Vessel Water Level—Low, Level 3 Function are required to be OPERABLE only when the ADS is required to be OPERABLE to ensure that no single instrument failure can preclude ADS initiation. One channel inputs to ADS trip system A, while the other channel inputs to ADS trip system B. Refer to LCO 3.5.1 for ADS Applicability Bases.

**4.e, 4.f, 5.e, 5.f. Core Spray and Low Pressure Coolant Injection  
Pump Discharge Pressure - Low**

The Pump Discharge Pressure—High signals from the CS and LPCI pumps are used as permissives for ADS initiation, indicating that there is a source of low pressure cooling water available once the ADS has depressurized the vessel. Pump Discharge Pressure—High is one of the Functions assumed to be OPERABLE and capable of permitting ADS initiation during the events analyzed in Reference 1 with an assumed HPCI failure. For these events the ADS depressurizes the reactor vessel so that the low pressure ECCS can perform the core cooling functions. This core cooling function of the ECCS, along with the scram action of the RPS, ensures that the fuel peak cladding temperature remains below the limits of 10 CFR 50.46.

Pump discharge pressure signals are initiated from twelve pressure instruments, two on the discharge side of each of the four LPCI pumps and one on the discharge of each of CS pumps. In order to generate an ADS permissive in one trip system, it is necessary that only one LPCI pump or one CS subsystem indicate the high discharge pressure condition. The Pump Discharge Pressure—High Allowable Value is less than the pump discharge pressure when the pump is operating in a full flow mode and high enough to avoid any condition that results in a discharge pressure permissive when the CS and LPCI pumps are aligned for injection and the pumps are not running. The actual operating point of this function is not assumed in any transient or accident analysis.

Twelve channels of Core Spray and Low Pressure Coolant Injection Pump Discharge Pressure—High Function are only required to be OPERABLE when the ADS is required to be OPERABLE to ensure that no single instrument failure can preclude ADS initiation. Two CS channels associated with CS pumps A and C and four LPCI channels associated with LPCI pumps A and C are required for trip system A. Two CS channels associated with CS pumps B and D and four LPCI channels

(continued)

## BASES

APPLICABLE  
SAFETY  
ANALYSES,  
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APPLICABILITY

4.e, 4.f, 5.e, 5.f. Core Spray and Low Pressure Coolant Injection  
Pump Discharge Pressure – Low (continued)

associated with LPCI pumps B and D are required for trip system B. Refer to LCO 3.5.1 for ADS Applicability Bases.

4.g, 5.g. Automatic Depressurization System Drywell Pressure  
Bypass Actuation Timer

One of the signals required for ADS initiation is Drywell Pressure—High. However, if the event requiring ADS initiation occurs outside the drywell (e.g., main steam line break outside containment), a high drywell pressure signal may never be present. Therefore, the Automatic Depressurization System Drywell Pressure Bypass Actuation Timer is used to bypass the Drywell Pressure—High Function after a certain time period has elapsed. Operation of the Automatic Depressurization System Drywell Pressure Bypass Actuation Timer Function is not assumed in any accident analysis. The instrumentation is retained in the TS because ADS is part of the primary success path for mitigation of a DBA.

There are four Automatic Depressurization System Drywell Pressure Bypass Actuation Timer relays, two in each of the two ADS trip systems. The Allowable Value for the Automatic Depressurization System Low Water Level Actuation Timer is chosen to ensure that there is still time after depressurization for the low pressure ECCS subsystems to provide adequate core cooling.

Four channels of the Automatic Depressurization System Drywell Pressure Bypass Actuation Timer Function are required to be OPERABLE only when the ADS is required to be OPERABLE to ensure that no single instrument failure can preclude ADS initiation. Refer to LCO 3.5.1 for ADS Applicability Bases.

4.h, 5.h. Manual Initiation

The Manual Initiation push button channels introduce signals into the ADS logic to provide manual initiation capability and are redundant to the automatic protective instrumentation. There are two push buttons for each ADS trip system for a total of four.

(continued)

## BASES

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### APPLICABLE SAFETY

### ANALYSES, LCO, and APPLICABILITY

#### 4.h, 5.h. Manual Initiation (continued)

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

There is no Allowable Value for this Function since the channels are mechanically actuated based solely on the position of the push buttons. Four channels of the Manual Initiation Function (two channels per trip system) are only required to be OPERABLE when the ADS is required to be OPERABLE. Refer to LCO 3.5.1 for ADS Applicability Bases.

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### ACTIONS

A Note has been provided to modify the ACTIONS related to ECCS instrumentation channels. Section 1.3, Completion Times, specifies that once a Condition has been entered, subsequent divisions, subsystems, components, or variables expressed in the Condition discovered to be inoperable or not within limits will not result in separate entry into the Condition. Section 1.3 also specifies that Required Actions of the Condition continue to apply for each additional failure, with Completion Times based on initial entry into the Condition. However, the Required Actions for inoperable ECCS instrumentation channels provide appropriate compensatory measures for separate inoperable Condition entry for each inoperable ECCS instrumentation channel.

#### A.1

Required Action A.1 directs entry into the appropriate Condition referenced in Table 3.3.5.1-1. The applicable Condition referenced in the table is Function dependent. Each time a channel is discovered inoperable, Condition A is entered for that channel and provides for transfer to the appropriate subsequent Condition.

(continued)

## BASES

### **ACTIONS** (continued)

#### B.1, B.2, and B.3

Required Actions B.1 and B.2 are intended to ensure that appropriate actions are taken if multiple, inoperable, untripped channels within the same Function result in redundant automatic initiation capability being lost for the feature(s). Required Action B.1 features would be those that are initiated by Functions 1.a, 1.b, 1.c, 2.a, 2.b, and 2.c (e.g., low pressure ECCS). The Required Action B.2 system would be HPCI. For Required Action B.1, redundant automatic initiation capability is lost if (a) one Function 1.a, 1.b, 1.c, 2.a, or 2.b is inoperable and untripped with only one offsite source OPERABLE, or (b) one or more Function 1.a or Function 2.a channels in both divisions are inoperable and untripped, or (c) one or more Function 1.b or Function 2.b channels in both divisions are inoperable and untripped, or (d) one or more Function 1.c or Function 2.c channels in both divisions are inoperable and untripped.

For (a) above (Function 1.a, 1.b, 1.c, 2.a, or 2.b is inoperable and untripped with only one offsite source OPERABLE), the ESW pump timer resets may not receive a reset signal and the Reactor Building chillers, Turbine Building chillers and the Drywell cooling equipment may not receive a trip signal. Without the reset of the ESW pump timers and without the trip of the Reactor Building and Turbine Building chillers, the OPERABLE offsite circuit may not be capable of accepting starts of the ESW pumps concurrently with CS or LPCI pumps. For this situation, both the OPERABLE offsite circuit and the DG, that would not be capable of starting, should be declared inoperable. ACTIONS required by LCO 3.8.1 "AC Sources Operating" or LCO 3.8.2 "AC Sources Shutdown" should be taken or disable the affected reactor building/turbine building chillers and disable the affected ESW pumps automatic initiation capability and take the ACTIONS required by LCO 3.7.2 "ESW System".

For the Drywell cooling equipment trip, inoperability of this feature would require that the associated drywell cooling fans be declared inoperable in accordance with LCO 3.6.3.2 "Drywell Air Flow System".

With two offsite sources OPERABLE and one Function 1.a, 1.b, 1.c, 2.a or 2.b inoperable and untripped, sufficient ECCS equipment is available to meet the design basis accident analyses.

(continued)

**BASES**

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**ACTIONS**

**B.1, B.2, and B.3 (continued)**

For (b), (c) and (d) above, for each Division, since each inoperable channel would have Required Action B.1 applied separately (refer to ACTIONS Note), each inoperable channel would only require the affected portion of the associated system of low pressure ECCS, DGs, and associated features to be declared inoperable. However, since channels in both Divisions are inoperable and untripped, and the Completion Times started concurrently for the channels in both subsystems, this results in the affected portions in the associated low pressure ECCS and DGs being concurrently declared inoperable.

For Required Action B.2, redundant automatic initiation capability is lost if two Function 3.a or two Function 3.b channels are inoperable and untripped in the same trip system. In this situation (loss of redundant automatic initiation capability), the 24 hour allowance of Required Action B.3 is not appropriate and the feature(s) associated with the inoperable, untripped channels must be declared inoperable within 1 hour. As noted (Note 1 to Required Action B.1), Required Action B.1 is only applicable in MODES 1, 2, and 3. In MODES 4 and 5, the specific initiation time of the low pressure ECCS is not assumed and the probability of a LOCA is lower. Thus, a total loss of initiation capability for 24 hours (as allowed by Required Action B.3) is allowed during MODES 4 and 5. There is no similar Note provided for Required Action B.2 since HPCI instrumentation is not required in MODES 4 and 5; thus, a Note is not necessary. Notes are also provided (Note 2 to Required Action B.1 and the Note to Required Action B.2) to

(continued)

BASES

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ACTIONS

B.1, B.2, and B.3 (continued)

delineate which Required Action is applicable for each Function that requires entry into Condition B if an associated channel is inoperable. This ensures that the proper loss of initiation capability check is performed.

The Completion Time is intended to allow the operator time to evaluate and repair any discovered inoperabilities. This Completion Time also allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." For Required Action B.1, the Completion Time only begins upon discovery that a redundant feature in both Divisions (e.g., both CS subsystems) cannot be automatically initiated due to inoperable, untripped channels within the same Function as described in the paragraph above. For Required Action B.2, the Completion Time only begins upon discovery that the HPCI System cannot be automatically initiated due to two inoperable, untripped channels for the associated Function in the same trip system. The 1 hour Completion Time from discovery of loss of initiation capability is acceptable because it minimizes risk while allowing time for restoration or tripping of channels.

Because of the diversity of sensors available to provide initiation signals and the redundancy of the ECCS design, an allowable out of service time of 24 hours has been shown to be acceptable (Ref. 3) to permit restoration of any inoperable channel to OPERABLE status. If the inoperable channel cannot be restored to OPERABLE status within the allowable out of service time, the channel must be placed in the tripped condition per Required Action B.3. Placing the inoperable channel in trip would conservatively compensate for the inoperability, restore capability to accommodate a single failure, and allow operation to continue. Alternately, if it is not desired to place the channel in trip (e.g., as in the case where placing the inoperable channel in trip would result in an initiation), Condition G must be entered and its Required Action taken.

(continued)



**BASES**

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**ACTIONS**  
(continued)

C.1 and C.2

**INTERIM ADMINISTRATIVE DIRECTION**

Technical Specification Table 3.3.5.1-1, "HPCI System, Function 3.e, Conditions Referenced from Required Action A.1" contains a typographical error (CR 620823). The "D" referenced should be "C." In accordance with Administrative Letter 98-10, direction is provided until proposed TS change (LDCN 3798) is approved by the NRC.

Required Action C.1 is intended to ensure that appropriate actions are taken if multiple, inoperable channels within the same Function result in redundant automatic initiation capability being lost for the feature(s).

Required Action C.1 features would be those that are initiated by Functions 1.d, 2.d, and 2.e (i.e., low pressure ECCS). Redundant automatic initiation capability is lost if either (a) two or more Function 1.d channels are inoperable such that the trip system loses initiation capability, (b) two or more Function 2.d channels are inoperable in the same trip system such that the trip system loses initiation capability, or (c) two or more Function 2.e channels are inoperable affecting LPCI pumps in different subsystems. In this situation (loss of redundant automatic initiation capability), the 24 hour allowance of Required Action C.2 is not appropriate and the feature(s) associated with the inoperable channels must be declared inoperable within 1 hour. Since each inoperable channel would have Required Action C.1 applied separately (refer to ACTIONS Note), each inoperable channel would only require the affected portion of the associated system to be declared inoperable. However, since channels for both low pressure ECCS subsystems are inoperable (e.g., both CS subsystems), and the Completion Times started concurrently for the channels in both subsystems, this results in the affected portions in both subsystems being concurrently declared inoperable. For Functions 1.d, 2.d, and 2.e, the affected portions are the associated low pressure ECCS pumps. As noted (Note 1), Required Action C.1 is only applicable in MODES 1, 2, and 3. In MODES 4 and 5, the specific initiation time of the ECCS is not assumed and the probability of a LOCA is lower. Thus, a total loss of automatic initiation capability for 24 hours (as allowed by Required Action C.2) is allowed during MODES 4 and 5.

Note 2 states that Required Action C.1 is only applicable for Functions 1.d, 2.d, and 2.e. Required Action C.1 is not applicable to Functions 1.e, 2.f, and 3.e (which also require entry into this Condition if a channel in these Functions is inoperable), since they are the Manual Initiation Functions and are not assumed in any accident or transient

(continued)

## BASES

### ACTIONS

#### C.1 and C.2 (continued)

analysis. Thus, a total loss of manual initiation capability for 24 hours (as allowed by Required Action C.2) is allowed. Required Action C.1 is also not applicable to Function 3.c (which also requires entry into this Condition if a channel in this Function is inoperable), since the loss of one channel results in a loss of the Function (two-out-of-two logic). This loss was considered during the development of Reference 3 and considered acceptable for the 24 hours allowed by Required Action C.2.

The Completion Time is intended to allow the operator time to evaluate and repair any discovered inoperabilities. This Completion Time also allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." For Required Action C.1, the Completion Time only begins upon discovery that the same feature in both subsystems (e.g., both CS subsystems) cannot be automatically initiated due to inoperable channels within the same Function as described in the paragraph above. The 1 hour Completion Time from discovery of loss of initiation capability is acceptable because it minimizes risk while allowing time for restoration of channels.

Because of the diversity of sensors available to provide initiation signals and the redundancy of the ECCS design, an allowable out of service time of 24 hours has been shown to be acceptable (Ref. 3) to permit restoration of any inoperable channel to OPERABLE status. If the inoperable channel cannot be restored to OPERABLE status within the allowable out of service time, Condition G must be entered and its Required Action taken. The Required Actions do not allow placing the channel in trip since this action would either cause the initiation or it would not necessarily result in a safe state for the channel in all events.

#### D.1, D.2.1, and D.2.2

##### **INTERIM ADMINISTRATIVE DIRECTION**

Technical Specification Table 3.3.5.1-1, "HPCI System, Function 3.e, Conditions Referenced from Required Action A.1" contains a typographical error (CR 620823). The "D" referenced should be "C." In accordance with Administrative Letter 98-10, direction is provided until proposed TS change (LDCN 3798) is approved by the NRC.

Required Action D.1 is intended to ensure that appropriate actions are taken if multiple, inoperable, untripped channels within the same Function result in a complete loss of automatic component initiation capability for

(continued)

## **BASES**

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### **ACTIONS**

#### **D.1, D.2.1, and D.2.2 continued)**

the HPCI System. Automatic component initiation capability is lost if two Function 3.d channels are inoperable and untripped. In this situation (loss of automatic suction swap), the 24 hour allowance of Required Actions D.2.1 and D.2.2 is not appropriate and the HPCI System must be declared inoperable within 1 hour after discovery of loss of HPCI initiation capability. A Note identifies that Required Action D.1 is only applicable if the HPCI pump suction is not aligned to the suppression pool, since, if aligned, the Function is already performed. This allows the HPCI pump suction to be realigned to the Suppression Pool within 1 hour, if desired.

The Completion Time is intended to allow the operator time to evaluate and repair any discovered inoperabilities. This Completion Time also allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." For Required Action D.1, the Completion Time only begins upon discovery that the HPCI System cannot be automatically aligned to the suppression pool due to two inoperable, untripped channels in the same Function. The 1 hour Completion Time from discovery of loss of initiation capability is acceptable because it minimizes risk while allowing time for restoration or tripping of channels. Because of the diversity of sensors available to provide initiation signals and the redundancy of the ECCS design, an allowable out of service time of 24 hours has been shown to be acceptable (Ref. 3) to permit restoration of any inoperable channel to OPERABLE status. If the inoperable channel cannot be restored to OPERABLE status within the allowable out of service time, the channel must be placed in the tripped condition per Required Action D.2.1 or the suction source must be aligned to the suppression pool per Required Action D.2.2. Placing the inoperable channel in trip performs the intended function of the channel (shifting the suction source to the suppression pool). Performance of either of these two Required Actions will allow operation to continue. If it is not desired to perform Required Actions D.2.1 and D.2.2, Condition G must be entered and its Required Action taken.

#### **E.1 and E.2**

Required Action E.1 is intended to ensure that appropriate actions are taken if multiple, inoperable, untripped channels within similar ADS trip system A and B Functions result in redundant automatic initiation capability being lost for the ADS. Redundant automatic initiation capability

(continued)

## BASES

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### ACTIONS

#### E.1 and E.2 (continued)

is lost if either (a) one Function 4.a channel and one Function 5.a channel are inoperable and untripped, (b) one Function 4.b channel and one Function 5.b channel are inoperable and untripped, or (c) one Function 4.d channel and one Function 5.d channel are inoperable and untripped.

In this situation (loss of automatic initiation capability), the 96 hour or 8 day allowance, as applicable, of Required Action E.2 is not appropriate and all ADS valves must be declared inoperable within 1 hour after discovery of loss of ADS initiation capability.

The Completion Time is intended to allow the operator time to evaluate and repair any discovered inoperabilities. This Completion Time also allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." For Required Action E.1, the Completion Time only begins upon discovery that the ADS cannot be automatically initiated due to inoperable, untripped channels within similar ADS trip system Functions as described in the paragraph above. The 1 hour Completion Time from discovery of loss of initiation capability is acceptable because it minimizes risk while allowing time for restoration or tripping of channels.

Because of the diversity of sensors available to provide initiation signals and the redundancy of the ECCS design, an allowable out of service time of 8 days has been shown to be acceptable (Ref. 3) to permit restoration of any inoperable channel to OPERABLE status if both HPCI and RCIC are OPERABLE. If either HPCI or RCIC is inoperable, the time is shortened to 96 hours. If the status of HPCI or RCIC changes such that the Completion Time changes from 8 days to 96 hours, the 96 hours begins upon discovery of HPCI or RCIC inoperability. However, the total time for an inoperable, untripped channel cannot exceed 8 days. If the status of HPCI or RCIC changes such that the Completion Time changes from 96 hours to 8 days, the "time zero" for beginning the 8 day "clock" begins upon discovery of the inoperable, untripped channel. If the inoperable channel cannot be restored to OPERABLE status within the allowable out of service time, the channel must be placed in the tripped condition per Required Action E.2. Placing the inoperable channel in trip would conservatively compensate for the

(continued)

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### ACTIONS

#### E.1 and E.2 (continued)

inoperability, restore capability to accommodate a single failure, and allow operation to continue. Alternately, if it is not desired to place the channel in trip (e.g., as in the case where placing the inoperable channel in trip would result in an initiation), Condition G must be entered and its Required Action taken.

#### F.1 and F.2

Required Action F.1 is intended to ensure that appropriate actions are taken if multiple, inoperable channels within similar ADS trip system Functions result in automatic initiation capability being lost for the ADS. Automatic initiation capability is lost if either (a) one Function 4.c channel and one Function 5.c channel are inoperable, (b) a combination of Function 4.e, 4.f, 5.e, and 5.f channels are inoperable such that both ADS trip systems lose initiation capability, or (c) one or more Function 4.g channels and one or more Function 5.g channels are inoperable.

In this situation (loss of automatic initiation capability), the 96 hour or 8 day allowance, as applicable, of Required Action F.2 is not appropriate, and all ADS valves must be declared inoperable within 1 hour after discovery of loss of ADS initiation capability. The Note to Required Action F.1 states that Required Action F.1 is only applicable for Functions 4.c, 4.e, 4.f, 4.g, 5.c, 5.e, 5.f, and 5.g. Required Action F.1 is not applicable to Functions 4.h and 5.h (which also require entry into this Condition if a channel in these Functions is inoperable), since they are the Manual Initiation Functions and are not assumed in any accident or transient analysis. Thus, a total loss of manual initiation capability for 96 hours or 8 days (as allowed by Required Action F.2) is allowed.

The Completion Time is intended to allow the operator time to evaluate and repair any discovered inoperabilities. This Completion Time also allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." For Required Action F.1, the Completion Time only begins upon discovery that the ADS cannot be automatically initiated due to inoperable channels within similar ADS trip system Functions as described in the paragraph above. The

(continued)

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**BASES**

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**ACTIONS**

**F.1 and F.2 (continued)**

1 hour Completion Time from discovery of loss of initiation capability is acceptable because it minimizes risk while allowing time for restoration or tripping of channels.

Because of the diversity of sensors available to provide initiation signals and the redundancy of the ECCS design, an allowable out of service time of 8 days has been shown to be acceptable (Ref. 3) to permit restoration of any inoperable channel to OPERABLE status if both HPCI and RCIC are OPERABLE (Required Action F.2). If either HPCI or RCIC is inoperable, the time shortens to 96 hours. If the status of HPCI or RCIC changes such that the Completion Time changes from 8 days to 96 hours, the 96 hours begins upon discovery of HPCI or RCIC inoperability. However, the total time for an inoperable channel cannot exceed 8 days. If the status of HPCI or RCIC changes such that the Completion Time changes from 96 hours to 8 days, the "time zero" for beginning the 8 day "clock" begins upon discovery of the inoperable channel. If the inoperable channel cannot be restored to OPERABLE status within the allowable out of service time, Condition G must be entered and its Required Action taken. The Required Actions do not allow placing the channel in trip since this action would not necessarily result in a safe state for the channel in all events.

**G.1**

With any Required Action and associated Completion Time not met, the associated supported feature(s) may be incapable of performing the intended function, and those associated with inoperable untripped channels must be declared inoperable immediately.

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**SURVEILLANCE  
REQUIREMENTS**

As noted in the beginning of the SRs, the SRs for each ECCS instrumentation Function are found in the SRs column of Table 3.3.5.1-1.

The Surveillances are modified by a Note to indicate that when a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to

(continued)

## **BASES**

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### **SURVEILLANCE REQUIREMENTS (continued)**

6 hours as follows: (a) for Function 3.c and 3.f; and (b) for Functions other than 3.c and 3.f provided the associated Function or redundant Function maintains ECCS initiation capability. Upon completion of the Surveillance, or expiration of the 6 hour allowance, the channel must be returned to OPERABLE status or the applicable Condition entered and Required Actions taken. This Note is based on the reliability analysis (Ref. 3) assumption of the average time required to perform channel surveillance. That analysis demonstrated that the 6 hour testing allowance does not significantly reduce the probability that the ECCS will initiate when necessary.

In addition, for Functions 1.a, 1.b, 1.c, 2.a, and 2.b, the 6 hour allowance is acceptable provided both offsite sources are OPERABLE.

#### **SR 3.3.5.1.1**

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

Agreement criteria which are determined by the plant staff based on an investigation of a combination of the channel instrument uncertainties may be used to support this parameter comparison and include indication and readability. If a channel is outside the criteria, it may be an indication that the instrument has drifted outside its limit, and does not necessarily indicate the channel is Inoperable.

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

(continued)

**BASES**

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**SURVEILLANCE  
REQUIREMENTS  
(continued)**

**SR 3.3.5.1.2**

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. The Frequency of 92 days is based on the reliability analyses of Reference 3.

This SR is modified by a Note that provides a general exception to the definition of CHANNEL FUNCTIONAL TEST. This exception is necessary because the design of instrumentation does not facilitate functional testing of all required contacts of the relay which input into the combinational logic. (Reference 5) Performance of such a test could result in a plant transient or place the plant in an undo risk situation. Therefore, for this SR, the CHANNEL FUNCTIONAL TEST verifies acceptable response by verifying the change of state of the relay which inputs into the combinational logic. The required contacts not tested during the CHANNEL FUNCTIONAL TEST are tested under the LOGIC SYSTEM FUNCTIONAL TEST, SR 3.3.5.1.5. This is acceptable because operating experience shows that the contacts not tested during the CHANNEL FUNCTIONAL TEST normally pass the LOGIC SYSTEM FUNCTIONAL TEST, and the testing methodology minimizes the risk of unplanned transients.

**SR 3.3.5.1.3 and SR 3.3.5.1.4**

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

The Frequency of SR 3.3.5.1.3 is based upon the assumption of a 92 day calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis.

The Frequency of SR 3.3.5.1.4 is based upon the assumption of a 24 month calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis.

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**BASES**

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**SURVEILLANCE  
REQUIREMENTS**

**SR 3.3.5.1.5**

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required initiation logic for a specific channel. The system functional testing performed in LCO 3.5.1, LCO 3.5.2, LCO 3.8.1, and LCO 3.8.2 overlaps this Surveillance to complete testing of the assumed safety function. The LOGIC SYSTEM FUNCTIONAL TEST tests the operation of the initiation logic up to but not including the first contact which is unique to an individually supported feature such as the starting of a DG.

The 24 month Frequency is based on the need to perform portions of this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown that these components usually pass the Surveillance when performed at the 24 month Frequency.

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**REFERENCES**

1. FSAR, Section 6.3.
  2. FSAR, Chapter 15.
  3. NEDC-30936-P-A, "BWR Owners' Group Technical Specification Improvement Analyses for ECCS Actuation Instrumentation, Part 2," December 1988.
  4. Final Policy Statement on Technical Specifications Improvements, July 22, 1993 (58 FR 32193).
  5. NRC Inspection and Enforcement Manual, Part 9900: Technical Guidance, Standard Technical Specification Section 1.0 Definitions, Issue date 12/08/86.
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