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May 25, 2005

Docket Nos.: 50-321
50-366



Energy to Serve Your WorldSM

NL-04-2401

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

Edwin I. Hatch Nuclear Plant

Request to Revise Technical Specifications Limiting Condition for Operation 3.0.4 and
Surveillance Requirement 3.0.4 using the Consolidated Line Item Improvement Process

Ladies and Gentlemen:

In accordance with the provisions of 10 CFR 50.90, Southern Nuclear Operating Company (SNC) is submitting a request for an amendment to the Technical Specifications (TS) for Plant Hatch Units 1 and 2.

The proposed amendment would revise Technical Specification (TS) requirements for mode change limitations in Limiting Condition for Operation (LCO) 3.0.4 and Surveillance Requirement (SR) 3.0.4, as well as several other TS sections that reference LCO 3.0.4.

The proposed changes are based on Technical Specification Task Force (TSTF) Traveler 359, Revision 9, "Increased Flexibility in Mode Restraints." The availability of this TS improvement was announced in the Federal Register on April 4, 2003 (68 FR 16579) as part of the Consolidated Line Item Improvement Process (CLIIP).

Enclosure 1 provides the description and justification of the proposed changes. Enclosure 2 provides the mark-up of the TS and Bases pages, and Enclosure 3 provides the clean-typed pages.

SNC requests approval of the proposed changes by June 30, 2006, with the amendment being implemented within 60 days.

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

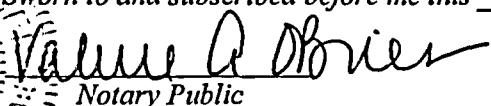
This letter contains no NRC commitments. If you have any questions, please advise.

Sincerely,



H. L. Sumner, Jr.

Sworn to and subscribed before me this 25 *day of* May, 2005.



Valerie A. Dorier
Notary Public

My commission expires: 4-28-07

HLS/OCV/daj

Enclosures: 1. Description and Justification of the Proposed Changes
2. Mark-up of the Technical Specifications and Bases
3. Clean-typed Pages

cc: Southern Nuclear Operating Company
Mr. J. T. Gasser, Executive Vice President
Mr. G. R. Frederick, General Manager – Plant Hatch
RTYPE: CHA02.004

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

State of Georgia
Mr. L. C. Barrett, Commissioner – Department of Natural Resources

Enclosure 1

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Request to Revise Technical Specifications Limiting Condition for Operation 3.0.4 and Surveillance Requirement 3.0.4 using the Consolidated Line Item Improvement Process

Description and Justification of Changes

1.0 DESCRIPTION

This amendment request proposes to modify the Technical Specifications (TS) requirements for mode change limitations in Limiting Condition for Operation (LCO) 3.0.4 and Surveillance Requirement (SR) 3.0.4. The change is done under the provisions of the Consolidated Line Item Improvement Process (CLIIP) and is consistent with Technical Specification Task Force (TSTF) Traveler 359, Revision 9. The availability of this CLIIP was announced in the Federal Register on April 4, 2003 (68 FR 16579). The FR notice specifically approved TSTF-359, Revision 8, with some suggested modifications. Those modifications were incorporated in Revision 9, which was submitted to NRC on April 28, 2003 and approved by NRC on May 9, 2003.

Proposed Changes

Following is a description of each change. If the change is not described in TSTF-359, Revision 9, it is so noted.

Changes to Section 1.0, "Use and Application", and Section 3.0, "Applicability", are described below:

Section 1.0, "Use and Application"

Section 1.4, "Frequency", example 1.4-1 is revised to be consistent with the proposed changes to LCO 3.0.4 and SR 3.0.4. This change is not a part of the TSTF, however, the change is meant to insure consistency between section 1.4 and the new requirements of LCO 3.0.4 and SR 3.0.4. As such, it is administrative in nature.

Section 3.0, "Applicability"

LCO 3.0.4 is revised to allow entry into a mode or other specified condition in the Applicability while relying on the associated Actions, provided that (a) the Actions to be entered permit continued operation in the mode or other specified mode in the applicability for an unlimited period of time, or (b) there is a risk assessment performed which justifies the use of LCO 3.0.4, or (c) an allowance is provided in the specification to be entered. The applicability of LCO 3.0.4 is expanded to include transition into all modes (including modes 4 and 5) or other specified conditions in the applicability, while retaining the exception that LCO 3.0.4 will not prevent mode changes that are required to comply with the Actions or that are part of a shutdown of the unit. The associated Bases are also being modified in accordance with TSTF-359, Revision 9.

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Description and Justification of Changes

SR 3.0.4 is revised to reflect the concepts of the change to LCO 3.0.4. The applicability of LCO 3.0.4 and SR 3.0.4 is expanded to include transition into all modes or other specified conditions in the applicability, except when required to comply with Actions that are part of a shutdown of the unit. The associated Bases likewise are being modified in accordance with TSTF-359, Revision 9.

Changes to individual system and parameter Specifications are described below:

LCO 3.3.3.1, Post Accident Monitoring (PAM) instrumentation

Note 1, which exempts the PAM system from the requirements of LCO 3.0.4, is being removed.

LCO 3.3.3.2 Remote Shutdown System

Note 1 in the Actions section which exempts the remote shutdown system from the requirements of LCO 3.0.4, is being removed.

LCO 3.3.6.3, Low-Low Set (LLS) Instrumentation

The Note in Required Action B.1, which exempts the Action from the requirements of LCO 3.0.4, is being removed.

LCO 3.4.5, RCS Leakage Detection Instrumentation

The Note in the Actions section, which exempts the RCS leakage detection system from the requirements of LCO 3.0.4, is being removed.

LCO 3.4.6, RCS Specific Activity

The Note in Required Action A, which exempts the ACTION from the requirements of LCO 3.0.4 is removed and replaced with a Note stating that LCO 3.0.4.c is applicable.

LCO 3.4.7, Residual Heat Removal (RHR) Shutdown Cooling System - Hot Shutdown

The Note in the Actions section, which exempts the shutdown cooling system from the requirements of LCO 3.0.4, is being removed.

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Description and Justification of Changes

LCO 3.5.1, ECCS – Operating

A Note is added indicating that the provisions of LCO 3.0.4.b are not applicable to the High Pressure Coolant Injection (HPCI) System.

LCO 3.5.3, RCIC System

A Note is added indicating that the provisions of LCO 3.0.4.b are not applicable to the Reactor Core Isolation Cooling (RCIC) System.

Unit 1 LCO 3.6.3.1, Containment Atmosphere Dilution (CAD) System

A Note in Required Action A.1, which exempts the CAD system from the requirements of LCO 3.0.4, is being removed.

Unit 2 LCO 3.6.3.3, Drywell Cooling System Fans

The Note in Required Action A.1, which exempts the drywell cooling fans from the requirements of LCO 3.0.4, is being removed.

LCO 3.7.1, Residual Heat Removal Service Water (RHRSW) System.

The Note in Action A.1, which exempts the RHRSW system (one pump out of service) from the requirements of LCO 3.0.4, is removed. This change is not in the TSTF since the 3.0.4 exemption for the RHRSW system is not a part of the Standard Technical Specifications (STS) but is unique to Plant Hatch.

LCO 3.7.2, Plant Service Water (PSW) System and Ultimate Heat Sink

Notes are being removed in Required Actions A.1, B.1, and C.1 which exempt these actions from the requirements of LCO 3.0.4.

LCO 3.7.3 Diesel Generator (DG) 1B Standby Service Water (SSW) System.

A Note in Required Action A.1, which exempts the standby service water pump from the requirements of LCO 3.0.4, is being removed.

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Description and Justification of Changes

LCO 3.8.1, AC Sources – Operating

A Note is added to the Actions section stating that the provisions of LCO 3.0.4 are not applicable to the Diesel Generators.

Appropriate Bases changes are also made to each of the above individual system Specifications.

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

Southern Nuclear (SNC) has reviewed the proposed safety evaluation dated April 4, 2003 as part of the CLIIP. This review included a review of the NRC staff's safety evaluation, as well as the information provided to support TSTS-359, Revision 8, including the updated information which resulted in Revision 9. SNC has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to Plant Hatch Units 1 and 2, and justify this amendment for the incorporation of the changes to the Plant Hatch Technical Specifications.

2.2 Optional Changes and Variations

SNC is not proposing any variations and deviations from TSTF-359, Revision 9 which would result in the NRC model safety evaluation being invalidated. However, there are some minor differences made for the sake of clarification and due to the differences between the STS and the Hatch TS. These variations are discussed below:

Clarification made to section 1.4

Section 1.4 of the Technical Specifications provides a detailed definition and explanation of the concept of frequency, as used in the STS. Example 1.4-1 provides an example of a typical TS SR with a typical frequency. Within the example, it states the following: "If the interval as specified by SR 3.0.2 is exceeded while the unit is not in a MODE or other specified condition in the Applicability of the LCO for which performance of the SR is required, the SR must be performed within the frequency requirements of SR 3.0.2 prior to entry into the MODE or other specified condition. Failure to do so would be a violation of SR 3.0.4."

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Surveillance Requirement 3.0.4 using the Consolidated Line Item Improvement Process

Description and Justification of Changes

Under the new version of LCO 3.0.4 and SR 3.0.4, failure to perform the surveillance will not necessarily mean a violation of SR 3.0.4. These words are modified slightly to account for the new requirements.

LCO 3.5.3, RCIC System

Currently, Hatch has a specific LCO 3.0.4 exemption for the RCIC System. This exemption is not in the STS. Consequently, the exemption will be removed from the LCO and the note prohibiting the use of LCO 3.0.4.b is being added.

Unit 2 LCO 3.6.3.3, Drywell Cooling System Fans

This Specification is unique to Unit 2. Consequently, there is no specific LCO 3.0.4 exemption Note to remove from the Unit 1 Technical Specifications.

Unit 1 LCO 3.6.3.1, Containment Atmosphere Dilution

This Specification is unique to Unit 1, consequently, there is no LCO 3.0.4 exemption Note to remove from the Unit 2 Technical Specifications.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Determination

SNC has reviewed the proposed no significant hazards consideration determination published in the Federal Register as part of the CLIIIP. SNC has concluded that the proposed evaluation presented in the Federal Register notice is applicable to Plant Hatch and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

3.2 Verifications and Commitments

As discussed in the notice of availability published in the Federal Register on April 4, 2003 (68 FR 16593), plant specific verifications were performed as discussed below.

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Description and Justification of Changes

SNC has established TS Bases for LCO 3.0.4 and SR 3.0.4 which state that use of the TS mode change limitation flexibility established by LCO 3.0.4 and SR 3.0.4 is not to be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to operable status before entering an associated mode or other specified condition in the TS applicability.

The modification also includes changes to the Bases for LCO 3.0.4 and SR 3.0.4 that provide details on how to implement the new requirements. The Bases changes provide guidance for changing modes or other specified conditions in the Applicability when an LCO is not met. The Bases changes describe in detail how:

LCO 3.0.4 allows entry into a MODE or other specified condition in the Applicability with the LCO not met. LCO 3.0.4.a allows such entry when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited amount of time.

LCO 3.0.4.b allows entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate.

LCO3.0.4.c allows entry into a MODE or other specified condition in the Applicability with the LCO not met based on a note or specification, which is typically applied to specifications which describe values and parameters, e.g., drywell air temperature, drywell pressure, etc., though it may be applied to other specifications based on plant specific NRC approval. The Bases also state that any risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, "Assessing and Managing Risks Before Maintenance Activities at Nuclear Power Plants," and that the results of the risk assessment shall be considered in determining the acceptability of entering the mode or other specified condition in the Applicability, and any corresponding risk management actions. In addition, the Bases state that upon entry into a MODE or other specified condition in the Applicability with the LCO not met, LCO 3.0.1 and LCO 3.0.2 require entry into the applicable Conditions and Required Actions for no more than the duration of the applicable Completion Time or until the LCO is met or the unit is not within the Applicability of the TS. The Bases also state that SR 3.0.4 does not restrict changing MODES or other specified conditions of the Applicability when a surveillance has not been performed within the specified Frequency, provided the requirement to declare the

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Description and Justification of Changes

LCO not met has been delayed in accordance with SR 3.0.3. These Bases changes are made in accordance with the Bases Control Program, section 5.5.13 of the Hatch TS.

4.0 ENVIRONMENTAL EVALUATION

Southern Nuclear has reviewed the environmental evaluation included in the model safety evaluation dated April 4, 2003 as part of the CLIIP. SNC has concluded that the staff's findings presented in that evaluation are applicable to Plant Hatch Units 1 and 2 and the evaluation is hereby incorporated by reference in this application.

Enclosure 2

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Surveillance Requirement 3.0.4 using the Consolidated Line Item Improvement Process

Marked-up Technical Specifications and Bases Pages

1.4 Frequency

- | | |
|----------------------------|--|
| DESCRIPTION
(continued) | <ul style="list-style-type: none"> a. The Surveillance is not required to be performed; and b. The Surveillance is not required to be met or, even if required to be met, is not known to be failed. |
|----------------------------|--|

EXAMPLES	The following examples illustrate the various ways that Frequencies are specified. In these examples, the Applicability of the LCO (LCO not shown) is MODES 1, 2, and 3.
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EXAMPLE 1.4-1SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
Perform CHANNEL CHECK.	12 hours

Example 1.4-1 contains the type of SR most often encountered in the Technical Specifications (TS). The Frequency specifies an interval (12 hours) during which the associated Surveillance must be performed at least one time. Performance of the Surveillance initiates the subsequent interval. Although the Frequency is stated as 12 hours, an extension of the time interval to 1.25 times the interval specified in the Frequency is allowed by SR 3.0.2 for operational flexibility. The measurement of this interval continues at all times, even when the SR is not required to be met per SR 3.0.1 (such as when the equipment is inoperable, a variable is outside specified limits, or the unit is outside the Applicability of the LCO). If the interval specified by SR 3.0.2 is exceeded while the unit is in a MODE or other specified condition in the Applicability of the LCO, and the performance of the Surveillance is not otherwise modified (refer to Examples 1.4-3 and 1.4-4), then SR 3.0.3 becomes applicable.

If the interval as specified by SR 3.0.2 is exceeded while the unit is not in a MODE or other specified condition in the Applicability of the LCO for which performance of the SR is required, the Surveillance must be performed within the Frequency requirements of SR 3.0.2 prior to entry into the MODE or other specified condition. Failure to do so would result in a violation of SR 3.0.4

then SR 3.0.4 becomes applicable. The Surveillance must be performed within the Frequency requirements of SR 3.0.2, as modified by SR 3.0.3, prior to entry into the mode or other specified condition or the LCO is considered not met (in accordance with SR.3.0.1) and LCO 3.0.4 becomes applicable.

(continued)

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

- LCO 3.0.1 LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2 and LCO 3.0.7.
- LCO 3.0.2 Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6.

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.
- LCO 3.0.3 When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:

a. MODE 2 within 7 hours;

b. MODE 3 within 13 hours; and

c. MODE 4 within 37 hours.

Exceptions to this Specification are stated in the individual Specifications.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

LCO 3.0.3 is only applicable in MODES 1, 2, and 3.
- LCO 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time. This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.
- Insert 1** →

3.0 LCO APPLICABILITY

- LCO 3.0.4
(continued) ~~Exceptions to this Specification are stated in the individual Specifications. These exceptions allow entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered allow unit operation in the MODE or other specified condition in the Applicability only for a limited period of time.~~

~~LCO 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3.~~
- LCO 3.0.5 Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY, or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the required testing.
- LCO 3.0.6 When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, additional evaluations and limitations may be required in accordance with Specification 5.5.10, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.
- LCO 3.0.7 Special Operations LCOs in Section 3.10 allow specified Technical Specifications (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Special Operations LCOs is optional. When a Special Operations LCO is desired to be met but is not met, the ACTIONS of the Special Operations LCO shall be met. When a Special Operations LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with the other applicable Specifications.

3.0 SR APPLICABILITY (continued)

SR 3.0.4

Insert 2

~~Entry into a MODE or other specified condition in the Applicability of an LCO shall not be made unless the LCO's Surveillances have been met within their specified Frequency. This provision shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.~~

~~SR 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3.~~

3.3 INSTRUMENTATION

3.3.3.1 Post Accident Monitoring (PAM) Instrumentation

LCO 3.3.3.1 The PAM instrumentation for each Function in Table 3.3.3.1-1 shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

NOTES

1. LCO 3.0.4 is not applicable.
2. Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more Functions with one required channel inoperable.	A.1 Restore required channel to OPERABLE status.	30 days
B. Required Action and associated Completion Time of Condition A not met.	B.1 Initiate action in accordance with Specification 5.6.6.	Immediately
C. One or more Functions with two or more required channels inoperable.	C.1 Restore all but one required channel to OPERABLE status.	7 days
D. Required Action and associated Completion Time of Condition C not met.	D.1 Enter the Condition referenced in Table 3.3.3.1-1 for the channel.	Immediately
E. As required by Required Action D.1 and referenced in Table 3.3.3.1-1.	E.1 Be in MODE 3.	12 hours

(continued)

3.3 INSTRUMENTATION

3.3.3.2 Remote Shutdown System

LCO 3.3.3.2 The Remote Shutdown System Functions shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

NOTES	
1.	LCO 3.0.4 is not applicable.
2.	Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more required Functions inoperable.	A.1 Restore required Function to OPERABLE status.	30 days
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	12 hours

3.3 INSTRUMENTATION

3.3.6.3 Low-Low Set (LLS) Instrumentation

LCO 3.3.6.3 The LLS valve instrumentation for each Function in Table 3.3.6.3-1 shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One LLS valve with initiation capability not maintained.	A.1 Restore LLS valve initiation capability.	24 hours
B. One or more safety/relief valves (S/RVs) with one Function 3 channel inoperable.	B.1 <div style="border: 1px solid black; padding: 5px; text-align: center;"> <p>-----NOTE-----</p> <p>LCO 3.0.4 is not applicable.</p> </div> Restore tailpipe pressure switches to OPERABLE status.	Prior to entering MODE 2 or 3 from MODE 4
C. -----NOTE----- Separate Condition entry is allowed for each S/RV. One or more S/RVs with two Function 3 channels inoperable.	C.1 Restore one tailpipe pressure switch to OPERABLE status.	14 days

(continued)

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.5 RCS Leakage Detection Instrumentation

LCO 3.4.5 The following RCS leakage detection instrumentation shall be OPERABLE:

- a. Drywell floor drain sump monitoring system; and
- b. One channel of either primary containment atmospheric particulate or atmospheric gaseous monitoring system.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Drywell floor drain sump monitoring system inoperable.	<p style="text-align: center;">NOTE LCO 3.0.4 is not applicable.</p> <p>A.1 Restore drywell floor drain sump monitoring system to OPERABLE status.</p>	30 days
B. Required primary containment atmospheric monitoring system inoperable.	<p style="text-align: center;">NOTE LCO 3.0.4 is not applicable.</p> <p>B.1 Analyze grab samples of primary containment atmosphere.</p> <p><u>AND</u></p> <p>B.2 Restore required primary containment atmospheric monitoring system to OPERABLE status.</p>	Once per 12 hours 30 days

(continued)

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.6 RCS Specific Activity

LCO 3.4.6 The specific activity of the reactor coolant shall be limited to DOSE EQUIVALENT I-131 specific activity $\leq 0.2 \mu\text{Ci/gm}$.

APPLICABILITY: MODE 1,
 MODES 2 and 3 with any main steam line not isolated.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Reactor coolant specific activity $> 0.2 \mu\text{Ci/gm}$ and $\leq 4.0 \mu\text{Ci/gm}$ DOSE EQUIVALENT I-131.	<p style="text-align: center;">NOTE LCO 3.0.4 is not applicable.</p> <p><u>A.1</u> Determine DOSE EQUIVALENT I-131. <u>AND</u> <u>A.2</u> Restore DOSE EQUIVALENT I-131 to within limits.</p>	<p>Once per 4 hours</p> <p>48 hours</p>
B. Required Action and associated Completion Time of Condition A not met. <u>OR</u> Reactor coolant specific activity $> 4.0 \mu\text{Ci/gm}$ DOSE EQUIVALENT I-131.	<p><u>B.1</u> Determine DOSE EQUIVALENT I-131. <u>AND</u> <u>B.2.1</u> Isolate all main steam lines. <u>OR</u> <u>B.2.2.1</u> Be in MODE 3. <u>AND</u> <u>B.2.2.2</u> Be in MODE 4.</p>	<p>Once per 4 hours</p> <p>12 hours</p> <p>12 hours</p> <p>36 hours</p>

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.7 Residual Heat Removal (RHR) Shutdown Cooling System - Hot Shutdown

LCO 3.4.7

Two RHR shutdown cooling subsystems shall be OPERABLE and, with no recirculation pump in operation, at least one RHR shutdown cooling subsystem shall be in operation.

-----NOTES-----

1. Both RHR shutdown cooling subsystems and recirculation pumps may be removed from operation for up to 2 hours per 8 hour period.
2. One RHR shutdown cooling subsystem may be inoperable for up to 2 hours for performance of Surveillances.

APPLICABILITY: MODE 3 with reactor steam dome pressure less than the RHR low pressure permissive pressure.

ACTIONS

-----NOTES-----

1. LCO 3.0.4 is not applicable.
2. Separate Condition entry is allowed for each RHR shutdown cooling subsystem.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or two RHR shutdown cooling subsystems inoperable.	<p>A.1 Initiate action to restore RHR shutdown cooling subsystem(s) to OPERABLE status.</p> <p><u>AND</u></p>	Immediately

(continued)

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS) AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

3.5.1 ECCS - Operating

LCO 3.5.1 Each ECCS injection/spray subsystem and the Automatic Depressurization System (ADS) function of six of seven safety/relief valves shall be OPERABLE.



APPLICABILITY: MODE 1,
MODES 2 and 3, except high pressure coolant injection (HPCI) and ADS valves are not required to be OPERABLE with reactor steam dome pressure ≤ 150 psig.

ACTIONS		Insert 4	
CONDITION		REQUIRED ACTION	COMPLETION TIME
A. One low pressure ECCS injection/spray subsystem inoperable.	A.1	Restore low pressure ECCS injection/spray subsystem to OPERABLE status.	7 days
B. Required Action and associated Completion Time of Condition A not met.	B.1 <u>AND</u> B.2	Be in MODE 3. Be in MODE 4.	12 hours 36 hours
C. HPCI System inoperable.	C.1 <u>AND</u> C.2	Verify by administrative means RCIC System is OPERABLE. Restore HPCI System to OPERABLE status.	1 hour 14 days

(continued)

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS) AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

3.5.3 RCIC System

LCO 3.5.3 The RCIC System shall be OPERABLE.

APPLICABILITY: MODE 1,
 MODES 2 and 3 with reactor steam dome pressure > 150 psig.

ACTIONS	CONDITION	REQUIRED ACTION	COMPLETION TIME
	A. RCIC System inoperable.	<p style="text-align: center;">NOTE LOO 3.0.4 is not applicable.</p> <p>A.1 Verify by administrative means high pressure coolant injection (HPCI) System is OPERABLE. <u>AND</u> A.2 Restore RCIC System to OPERABLE status.</p>	1 hour 14 days
	B. Required Action and associated Completion Time not met.	<p>B.1 Be in MODE 3. <u>AND</u> B.2 Reduce reactor steam dome pressure to ≤ 150 psig.</p>	12 hours 36 hours

3.6 CONTAINMENT SYSTEMS

3.6.3.1 Containment Atmosphere Dilution (CAD) System

LCO 3.6.3.1 Two CAD subsystems shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One CAD subsystem inoperable.	<p>A.1</p> <div style="border: 1px solid black; padding: 5px; text-align: center;"> NOTE LCO 3.0.4 is not applicable. </div> <p>Restore CAD subsystem to OPERABLE status.</p>	30 days
B. Two CAD subsystems inoperable.	<p>B.1 Verify by administrative means that the hydrogen control function is maintained.</p> <p><u>AND</u></p> <p>B.2 Restore one CAD subsystem to OPERABLE status.</p>	<p>1 hour</p> <p><u>AND</u></p> <p>Once per 12 hours thereafter</p> <p>7 days</p>
C. Required Action and associated Completion Time not met.	C.1 Be in MODE 3.	12 hours

3.7 PLANT SYSTEMS

3.7.1 Residual Heat Removal Service Water (RHRSW) System

LCO 3.7.1 Two RHRSW subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One RHRSW pump inoperable.	<p>-----NOTE----- LCO 3.0.4 is not applicable.</p> <p>A.1 Restore RHRSW pump to OPERABLE status.</p>	30 days
B. One RHRSW pump in each subsystem inoperable.	B.1 Restore one RHRSW pump to OPERABLE status.	7 days
C. One RHRSW subsystem inoperable for reasons other than Condition A.	<p>-----NOTE----- Enter applicable Conditions and Required Actions of LCO 3.4.7, "Residual Heat Removal (RHR) Shutdown Cooling System - Hot Shutdown," for RHR shutdown cooling made inoperable by RHRSW System.</p> <p>C.1 Restore RHRSW subsystem to OPERABLE status.</p>	7 days

(continued)

3.7 PLANT SYSTEMS

3.7.2 Plant Service Water (PSW) System and Ultimate Heat Sink (UHS)

LCO 3.7.2 Two PSW subsystems and UHS shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One PSW pump inoperable.	<p style="text-align: center;">-----NOTE----- LCO 3.0.4 is not applicable.</p> <p>A.1 Restore PSW pump to OPERABLE status.</p>	30 days
B. One PSW turbine building isolation valve inoperable.	<p style="text-align: center;">-----NOTE----- LCO 3.0.4 is not applicable.</p> <p>B.1 Restore PSW turbine building isolation valve to OPERABLE status.</p>	30 days
C. One PSW pump in each subsystem inoperable.	<p style="text-align: center;">-----NOTE----- LCO 3.0.4 is not applicable.</p> <p>C.1 Restore one PSW pump to OPERABLE status.</p>	7 days
D. One PSW turbine building isolation valve in each subsystem inoperable.	D.1 Restore one PSW turbine building isolation valve to OPERABLE status.	72 hours

(continued)

3.7 PLANT SYSTEMS

3.7.3 Diesel Generator (DG) 1B Standby Service Water (SSW) System

LCO 3.7.3 The DG 1B SSW System shall be OPERABLE.

APPLICABILITY: When DG 1B is required to be OPERABLE.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. DG 1B SSW System inoperable.	<p style="text-align: center;">NOTE LCO 3.0.4 is not applicable.</p> <p>A.1 Align cooling water to DG 1B from a Unit 1 plant service water (PSW) subsystem. <u>AND</u> A.2 Verify cooling water is aligned to DG 1B from a Unit 1 PSW subsystem. <u>AND</u> A.3 Restore DG 1B SSW System to OPERABLE status.</p>	8 hours Once per 31 days 60 days
B. Required Action and Associated Completion Time not met.	B.1 Declare DG 1B inoperable.	Immediately

Insert 6

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One required offsite circuit inoperable.	<p>A.1 Perform SR 3.8.1.1 for OPERABLE required offsite circuits.</p> <p><u>AND</u></p> <p>A.2 Declare required feature(s) with no offsite power available inoperable when the redundant required feature(s) are inoperable.</p> <p><u>AND</u></p> <p>A.3 Restore required offsite circuit to OPERABLE status.</p>	<p>1 hour</p> <p><u>AND</u></p> <p>Once per 8 hours thereafter</p> <p>24 hours from discovery of no offsite power to one 4160 V ESF bus concurrent with inoperability of redundant required feature(s)</p> <p>72 hours</p> <p><u>AND</u></p> <p>17 days from discovery of failure to meet LCO 3.8.1.a, b, or c</p>
B. One Unit 1 or the swing DG inoperable.	<p>B.1 Perform SR 3.8.1.1 for OPERABLE required offsite circuit(s).</p> <p><u>AND</u></p>	<p>1 hour</p> <p><u>AND</u></p> <p>Once per 8 hours thereafter</p>

(continued)



1.4 Frequency

- | | |
|----------------------------|---|
| DESCRIPTION
(continued) | <ul style="list-style-type: none">a. The Surveillance is not required to be performed; andb. The Surveillance is not required to be met or, even if required to be met, is not known to be failed. |
|----------------------------|---|

EXAMPLES	The following examples illustrate the various ways that Frequencies are specified. In these examples, the Applicability of the LCO (LCO not shown) is MODES 1, 2, and 3.
----------	--

EXAMPLE 1.4-1

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
Perform CHANNEL CHECK.	12 hours

then SR 3.0.4 becomes applicable. The surveillance must be performed within the Frequency requirements of SR 3.0.2, as modified by SR 3.0.3, prior to entry into the mode or other specified condition or the LCO is considered not met (in accordance with SR 3.0.1) and LCO 3.0.4 becomes applicable.

Example 1.4-1 contains the type of SR most often encountered in the Technical Specifications (TS). The Frequency specifies an interval (12 hours) during which the associated Surveillance must be performed at least one time. Performance of the Surveillance initiates the subsequent interval. Although the Frequency is stated as 12 hours, an extension of the time interval to 1.25 times the interval specified in the Frequency is allowed by SR 3.0.2 for operational flexibility. The measurement of this interval continues at all times, even when the SR is not required to be met per SR 3.0.1 (such as when the equipment is inoperable, a variable is outside specified limits, or the unit is outside the Applicability of the LCO). If the interval specified by SR 3.0.2 is exceeded while the unit is in a MODE or other specified condition in the Applicability of the LCO, and the performance of the Surveillance is not otherwise modified (refer to Examples 1.4-3 and 1.4-4), then SR 3.0.3 becomes applicable.

If the interval as specified by SR 3.0.2 is exceeded while the unit is not in a MODE or other specified condition in the Applicability of the LCO for which performance of the SR is required, the Surveillance must be performed within the Frequency requirements of SR 3.0.2 prior to entry into the MODE or other specified condition. Failure to do so would result in a violation of SR 3.0.4.

(continued)

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 3.0.1 LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2 and LCO 3.0.7.

LCO 3.0.2 Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6.

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.

LCO 3.0.3 When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:

- a. MODE 2 within 7 hours;
- b. MODE 3 within 13 hours; and
- c. MODE 4 within 37 hours.

Exceptions to this Specification are stated in the individual Specifications.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

LCO 3.0.3 is only applicable in MODES 1, 2, and 3.

LCO 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time. This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

Insert 1

(continued)

3.0 LCO APPLICABILITY

LCO 3.0.4 (continued)	<p>Exceptions to this Specification are stated in the individual Specifications. These exceptions allow entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered allow unit operation in the MODE or other specified condition in the Applicability only for a limited period of time.</p> <p>LCO 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3.</p>
LCO 3.0.5	<p>Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY, or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the required testing.</p>
LCO 3.0.6	<p>When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, additional evaluations and limitations may be required in accordance with Specification 5.5.10, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.</p> <p>When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.</p>
LCO 3.0.7	<p>Special Operations LCOs in Section 3.10 allow specified Technical Specifications (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Special Operations LCOs is optional. When a Special Operations LCO is desired to be met but is not met, the ACTIONS of the Special Operations LCO shall be met. When a Special Operations LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with the other applicable Specifications.</p>

3.0 SR APPLICABILITY (continued)

SR 3.0.4

Insert 2

~~Entry into a MODE or other specified condition in the Applicability of an LCO shall not be made unless the LCO's Surveillances have been met within their specified Frequency. This provision shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.~~

~~SR 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3.~~

3.3 INSTRUMENTATION

3.3.3.1 Post Accident Monitoring (PAM) Instrumentation

LCO 3.3.3.1 The PAM instrumentation for each Function in Table 3.3.3.1-1 shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

NOTES

1. ~~LCO 3.0.4 is not applicable.~~
2. Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more Functions with one required channel inoperable.	A.1 Restore required channel to OPERABLE status.	30 days
B. Required Action and associated Completion Time of Condition A not met.	B.1 Initiate action in accordance with Specification 5.6.6.	Immediately
C. One or more Functions with two or more required channels inoperable.	C.1 Restore all but one required channel to OPERABLE status.	7 days
D. Required Action and associated Completion Time of Condition C not met.	D.1 Enter the Condition referenced in Table 3.3.3.1-1 for the channel.	Immediately
E. As required by Required Action D.1 and referenced in Table 3.3.3.1-1.	E.1 Be in MODE 3.	12 hours

(continued)

3.3 INSTRUMENTATION

3.3.3.2 Remote Shutdown System

LCO 3.3.3.2 The Remote Shutdown System Functions shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

NOTES

1. ~~LCO 3.0.4 is not applicable.~~
2. Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more required Functions inoperable.	A.1 Restore required Function to OPERABLE status.	30 days
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	12 hours

3.3 INSTRUMENTATION

3.3.6.3 Low-Low Set (LLS) Instrumentation

LCO 3.3.6.3 The LLS valve instrumentation for each Function in Table 3.3.6.3-1 shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One LLS valve with initiation capability not maintained.	A.1 Restore LLS valve initiation capability.	24 hours
B. One or more safety/relief valves (S/RVs) with one Function 3 channel inoperable.	B.1 <div style="border: 1px solid black; padding: 5px; text-align: center;">-----NOTE----- LCO 3.0.4 is not applicable. -----</div> Restore tailpipe pressure switches to OPERABLE status.	Prior to entering MODE 2 or 3 from MODE 4
C. -----NOTE----- Separate Condition entry is allowed for each S/RV. One or more S/RVs with two Function 3 channels inoperable.	C.1 Restore one tailpipe pressure switch to OPERABLE status.	14 days

(continued)

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.5 RCS Leakage Detection Instrumentation

LCO 3.4.5 The following RCS leakage detection instrumentation shall be OPERABLE:

- a. Drywell floor drain sump monitoring system; and
- b. One channel of either primary containment atmospheric particulate or atmospheric gaseous monitoring system.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Drywell floor drain sump monitoring system inoperable.	<p style="text-align: center;">NOTE LCO 3.0.4 is not applicable.</p> <p>A.1 Restore drywell floor drain sump monitoring system to OPERABLE status.</p>	30 days
B. Required primary containment atmospheric monitoring system inoperable.	<p style="text-align: center;">NOTE LCO 3.0.4 is not applicable.</p> <p>B.1 Analyze grab samples of primary containment atmosphere.</p> <p><u>AND</u></p> <p>B.2 Restore required primary containment atmospheric monitoring system to OPERABLE status.</p>	Once per 12 hours 30 days

(continued)

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.6 RCS Specific Activity

LCO 3.4.6 The specific activity of the reactor coolant shall be limited to DOSE EQUIVALENT I-131 specific activity $\leq 0.2 \mu\text{Ci/gm}$.

APPLICABILITY: MODE 1,
 MODES 2 and 3 with any main steam line not isolated.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Reactor coolant specific activity $> 0.2 \mu\text{Ci/gm}$ and $\leq 4.0 \mu\text{Ci/gm}$ DOSE EQUIVALENT I-131.	<p style="text-align: center;">NOTE LCO 3.0.4 is not applicable.</p> <p>A.1 Determine DOSE EQUIVALENT I-131. <u>AND</u> A.2 Restore DOSE EQUIVALENT I-131 to within limits.</p>	<p>Once per 4 hours</p> <p>48 hours</p>
B. Required Action and associated Completion Time of Condition A not met. <u>OR</u> Reactor coolant specific activity $> 4.0 \mu\text{Ci/gm}$ DOSE EQUIVALENT I-131.	<p>B.1 Determine DOSE EQUIVALENT I-131. <u>AND</u> B.2.1 Isolate all main steam lines. <u>OR</u> B.2.2.1 Be in MODE 3. <u>AND</u> B.2.2.2 Be in MODE 4.</p>	<p>Once per 4 hours</p> <p>12 hours</p> <p>12 hours</p> <p>36 hours</p>

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.7 Residual Heat Removal (RHR) Shutdown Cooling System - Hot Shutdown

LCO 3.4.7 Two RHR shutdown cooling subsystems shall be OPERABLE and, with no recirculation pump in operation, at least one RHR shutdown cooling subsystem shall be in operation.

-----NOTES-----

1. Both RHR shutdown cooling subsystems and recirculation pumps may be removed from operation for up to 2 hours per 8 hour period.
2. One RHR shutdown cooling subsystem may be inoperable for up to 2 hours for performance of Surveillances.

APPLICABILITY: MODE 3 with reactor steam dome pressure less than the RHR low pressure permissive pressure.

ACTIONS

-----NOTES-----

1. LCO 3.0.4 is not applicable.
2. Separate Condition entry is allowed for each RHR shutdown cooling subsystem.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or two RHR shutdown cooling subsystems inoperable.	<p>A.1 Initiate action to restore RHR shutdown cooling subsystem(s) to OPERABLE status.</p> <p><u>AND</u></p>	Immediately <u>(continued)</u>

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS) AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

3.5.1 ECCS - Operating

LCO 3.5.1 Each ECCS injection/spray subsystem and the Automatic Depressurization System (ADS) function of six of seven safety/relief valves shall be OPERABLE.



APPLICABILITY: MODE 1,
MODES 2 and 3, except high pressure coolant injection (HPCI) and ADS valves are not required to be OPERABLE with reactor steam dome pressure \leq 150 psig.

ACTIONS		Insert 4	
CONDITION	REQUIRED ACTION	COMPLETION TIME	
A. One low pressure ECCS injection/spray subsystem inoperable.	A.1 Restore low pressure ECCS injection/spray subsystem to OPERABLE status.	7 days	
B. Required Action and associated Completion Time of Condition A not met.	B.1 Be in MODE 3. <u>AND</u> B.2 Be in MODE 4.	12 hours	36 hours
C. HPCI System inoperable.	C.1 Verify by administrative means RCIC System is OPERABLE. <u>AND</u> C.2 Restore HPCI System to OPERABLE status.	1 hour	14 days

(continued)

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS) AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

3.5.3 RCIC System

LCO 3.5.3 The RCIC System shall be OPERABLE.

APPLICABILITY: MODE 1,
 MODES 2 and 3 with reactor steam dome pressure > 150 psig.

ACTIONS	CONDITION	REQUIRED ACTION	COMPLETION TIME
	A. RCIC System inoperable.	<p style="text-align: center;">NOTE LCO 3.0.4 is not applicable.</p> <p><u>AND</u></p> <p>A.1 Verify by administrative means high pressure coolant injection (HPCI) System is OPERABLE.</p> <p><u>AND</u></p> <p>A.2 Restore RCIC System to OPERABLE status.</p>	<p>1 hour</p> <p>14 days</p>
	B. Required Action and associated Completion Time not met.	<p>B.1 Be in MODE 3.</p> <p><u>AND</u></p> <p>B.2 Reduce reactor steam dome pressure to ≤ 150 psig.</p>	<p>12 hours</p> <p>36 hours</p>

3.6 CONTAINMENT SYSTEMS

3.6.3.3 Drywell Cooling System Fans

LCO 3.6.3.3 Two drywell cooling system fans shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One required drywell cooling system fan inoperable.	<p style="text-align: center;">-----NOTE----- LCO 3.0.4 is not applicable.</p> <p>A.1 Restore required drywell cooling system fan to OPERABLE status.</p>	30 days
B. Two required drywell cooling system fans inoperable.	B.1 Restore one required drywell cooling system fan to OPERABLE status.	7 days
C. Required Action and Associated Completion Time not met.	C.1 Be in MODE 3.	12 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.6.3.3.1 Operate each required drywell cooling system fan for ≥ 15 minutes.	92 days

3.7 PLANT SYSTEMS

3.7.1 Residual Heat Removal Service Water (RHRSW) System

LCO 3.7.1 Two RHRSW subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One RHRSW pump inoperable.	<p style="text-align: center;">-----NOTE----- LCO 3.0.4 is not applicable.</p> <p>A.1 Restore RHRSW pump to OPERABLE status.</p>	30 days
B. One RHRSW pump in each subsystem inoperable.	B.1 Restore one RHRSW pump to OPERABLE status.	7 days
C. One RHRSW subsystem inoperable for reasons other than Condition A.	<p style="text-align: center;">-----NOTE----- Enter applicable Conditions and Required Actions of LCO 3.4.7, "Residual Heat Removal (RHR) Shutdown Cooling System - Hot Shutdown," for RHR shutdown cooling made inoperable by RHRSW System.</p> <p>C.1 Restore RHRSW subsystem to OPERABLE status.</p>	7 days

(continued)

3.7 PLANT SYSTEMS

3.7.2 Plant Service Water (PSW) System and Ultimate Heat Sink (UHS)

LCO 3.7.2 Two PSW subsystems and UHS shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One PSW pump inoperable.	<p style="text-align: center;">NOTE LCO 3.0.4 is not applicable.</p> <p>A.1 Restore PSW pump to OPERABLE status.</p>	30 days
B. One PSW turbine building isolation valve inoperable.	<p style="text-align: center;">NOTE LCO 3.0.4 is not applicable.</p> <p>B.1 Restore PSW turbine building isolation valve to OPERABLE status.</p>	30 days
C. One PSW pump in each subsystem inoperable.	<p style="text-align: center;">NOTE LCO 3.0.4 is not applicable.</p> <p>C.1 Restore one PSW pump to OPERABLE status.</p>	7 days
D. One PSW turbine building isolation valve in each subsystem inoperable.	D.1 Restore one PSW turbine building isolation valve to OPERABLE status.	72 hours

(continued)

3.7 PLANT SYSTEMS

3.7.3 Diesel Generator (DG) 1B Standby Service Water (SSW) System

LCO 3.7.3 The DG 1B SSW System shall be OPERABLE.

APPLICABILITY: When DG 1B is required to be OPERABLE.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. DG 1B SSW System inoperable.	<p style="text-align: center;">-----NOTE----- LCO 3.0.4 is not applicable.</p> <p>A.1 Align cooling water to DG 1B from a Unit 1 plant service water (PSW) subsystem. <u>AND</u> A.2 Verify cooling water is aligned to DG 1B from a Unit 1 PSW subsystem. <u>AND</u> A.3 Restore DG 1B SSW System to OPERABLE status.</p>	8 hours Once per 31 days 60 days
B. Required Action and Associated Completion Time not met.	B.1 Declare DG 1B inoperable.	Immediately

ACTIONS Insert 6

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One required offsite circuit inoperable.	<p>A.1 Perform SR 3.8.1.1 for OPERABLE required offsite circuits.</p> <p><u>AND</u></p> <p>A.2 Declare required feature(s) with no offsite power available inoperable when the redundant required feature(s) are inoperable.</p> <p><u>AND</u></p> <p>A.3 Restore required offsite circuit to OPERABLE status.</p>	<p>1 hour</p> <p><u>AND</u></p> <p>Once per 8 hours thereafter</p> <p>24 hours from discovery of no offsite power to one 4160 V ESF bus concurrent with inoperability of redundant required feature(s)</p> <p><u>AND</u></p> <p>72 hours</p> <p><u>AND</u></p> <p>17 days from discovery of failure to meet LCO 3.8.1.a, b, or c</p> 
B. One Unit 2 or the swing DG inoperable.	<p>B.1 Perform SR 3.8.1.1 for OPERABLE required offsite circuit(s).</p> <p><u>AND</u></p>	<p>1 hour</p> <p><u>AND</u></p> <p>Once per 8 hours thereafter</p>

(continued)

Common Inserts for Technical Specifications

INSERT 1

When an LCO is not met, entry into a mode or other specified condition in the Applicability shall only be made:

- a. When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time,
- b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate; exceptions to this specification are stated in the individual Specifications, or
- c. When an allowance is stated in the individual value, parameter, or other Specification.

This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

INSERT 2

Entry into a MODE or other specified condition in the Applicability of an LCO shall only be made when the LCO's Surveillances have been met within their specified Frequency, except as provided by SR 3.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with LCO 3.0.4.

This provision shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

INSERT 3

NOTE
LCO 3.0.4.c is applicable

INSERT 4

NOTE

LCO 3.0.4.b is not applicable to HPCI

INSERT 5

NOTE

LCO 3.0.4.b is not applicable to RCIC

INSERT 6

NOTE

LCO 3.0.4.b is not applicable to DGs

BASES (continued)

LCO 3.0.4

Insert B1

LCO 3.0.4 establishes limitations on changes in MODES or other specified conditions in the Applicability when an LCO is not met. It precludes placing the unit in a MODE or other specified condition stated in that Applicability (e.g., Applicability desired to be entered) when the following exist:

- a. Unit conditions are such that the requirements of the LCO would not be met in the Applicability desired to be entered; and
- b. Continued noncompliance with the LCO requirements, if the Applicability were entered, would result in the unit being required to exit the Applicability desired to be entered to comply with the Required Actions.

Compliance with Required Actions that permit continued operation of the unit for an unlimited period of time in a MODE or other specified condition provides an acceptable level of safety for continued operation. This is without regard to the status of the unit before or after the MODE change. Therefore, in such cases, entry into a MODE or other specified condition in the Applicability may be made in accordance with the provisions of the Required Actions. The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

The provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown.

Exceptions to LCO 3.0.4 are stated in the individual Specifications. Exceptions may apply to all the ACTIONS or to a specific Required Action of a Specification.

LCO 3.0.4 is only applicable when entering MODE 3 from MODE 4, MODE 2 from MODE 3 or 4, or MODE 1 from MODE 2. Furthermore, LCO 3.0.4 is applicable when entering any other specified condition in the Applicability only while operating in MODE 1, 2, or 3. The requirements of LCO 3.0.4 do not apply in MODES 4 and 5, or in other specified conditions of the Applicability (unless in MODE 1, 2, or 3) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.

(continued)

BASES

LCO 3.0.4
(continued)

Surveillances do not have to be performed on the associated inoperable equipment (or on variables outside the specified limits), as permitted by SR 3.0.1. Therefore, changing MODES or other specified conditions while in an ACTIONS Condition, either in compliance with LCO 3.0.4 or where an exception to LCO 3.0.4 is stated is not a violation of SR 3.0.1 or SR 3.0.4 for those surveillances that do not have to be performed due to the associated inoperable equipment. However, SRs must be met to ensure OPERABILITY prior to declaring the associated equipment OPERABLE (or variable within limits) and restoring compliance with the affected LCO.

LCO 3.0.5

LCO 3.0.5 establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS. The sole purpose of this Specification is to provide an exception to LCO 3.0.2 [e.g., to not comply with the applicable Required Action(s)] to allow the performance of SRs to demonstrate:

- a. The OPERABILITY of the equipment being returned to service; or
- b. The OPERABILITY of other equipment.

The administrative controls ensure the time the equipment is returned to service in conflict with the requirements of the ACTIONS is limited to the time absolutely necessary to perform the allowed SRs. This Specification does not provide time to perform any other preventive or corrective maintenance.

An example of demonstrating the OPERABILITY of the equipment being returned to service is reopening a containment isolation valve that has been closed to comply with Required Actions and must be reopened to perform the SRs.

An example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of an SR on another channel in the other trip system. A similar example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to permit the logic to function and indicate the appropriate response during the performance of an SR on another channel in the same trip system.

(continued)

BASES

SR 3.0.3 (continued)

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon the failure of the Surveillance.

Completion of the Surveillance within the delay period allowed by this Specification, or within the Completion Time of the ACTIONS, restores compliance with SR 3.0.1.

SR 3.0.4

SR 3.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified condition in the Applicability. This Specification ensures that system and component OPERABILITY requirements and variable limits are met before entry into MODES or other specified conditions in the Applicability for which these systems and components ensure safe operation of the unit.

However, in certain circumstances, failing to meet an SR will not result in SR 3.0.4 restricting a MODE change or other specified condition change. When a system, subsystem, division, component, device, or variable is inoperable or outside its specified limits, the associated SR(s) are not required to be performed per SR 3.0.1, which states that surveillances do not have to be performed on inoperable equipment. When equipment is inoperable, SR 3.0.4 does not apply to the associated SR(s) since the requirement for the SR(s) to be performed is removed. Therefore, failing to perform the Surveillance(s) within the specified Frequency on equipment that is inoperable, does not result in an SR 3.0.4 restriction to changing MODES or other specified conditions of the Applicability. However, since the LCO is not met in this instance, LCO 3.0.4 will govern any restrictions that may (or may not) apply to MODE or other specified condition changes.

The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

Insert B2

(continued)



BASES

SR 3.0.4
(continued)

The provisions of SR 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of SR 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown.

The precise requirements for performance of SRs are specified such that exceptions to SR 3.0.4 are not necessary. The specific time frames and conditions necessary for meeting the SRs are specified in the Frequency, in the Surveillance, or both. This allows performance of Surveillances when the prerequisite condition(s) specified in a Surveillance procedure require entry into the MODE or other specified condition in the Applicability of the associated LCO prior to the performance or completion of a Surveillance. A Surveillance that could not be performed until after entering the LCO Applicability would have its Frequency specified such that it is not "due" until the specific conditions needed are met. Alternately, the Surveillance may be stated in the form of a Note as not required (to be met or performed) until a particular event, condition, or time has been reached. Further discussion of the specific formats of SRs' annotation is found in Section 1.4, Frequency.

SR 3.0.4 is only applicable when entering MODE 3 from MODE 4, MODE 2 from MODE 3 or 4, or MODE 1 from MODE 2. Furthermore, SR 3.0.4 is applicable when entering any other specified condition in the Applicability only while operating in MODE 1, 2, or 3. The requirements of SR 3.0.4 do not apply in MODES 4 and 5, or in other specified conditions of the Applicability (unless in MODE 1, 2, or 3) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.



BASES

LCO
(continued)

12. RHR Service Water Flow

RHR service water flow is a Type A variable provided to support the containment cooling function. The RHR Service Water flow signals are transmitted from separate flow transmitters (one per subsystem) and are continuously read on two control room indicators. These indicators are the primary indication used by the operator during an accident. Therefore, the PAM specification deals specifically with this portion of the instrument channel.

APPLICABILITY

The PAM instrumentation LCO is applicable in MODES 1 and 2. These variables are related to the diagnosis and preplanned actions required to mitigate DBAs. The applicable DBAs are assumed to occur in MODES 1 and 2. In MODES 3, 4, and 5, plant conditions are such that the likelihood of an event that would require PAM instrumentation is extremely low; therefore, PAM instrumentation is not required to be OPERABLE in these MODES.

ACTIONS

Note 1 has been added to the ACTIONS to exclude the MODE change restriction of LCO 3.0.4. This exception allows entry into the applicable MODE while relying on the ACTIONS even though the ACTIONS may eventually require plant shutdown. This exception is acceptable due to the passive function of the instruments, the operator's ability to diagnose an accident using alternative instruments and methods, and the low probability of an event requiring these instruments

A

Note 2 has been provided to modify the ACTIONS related to PAM 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 PAM instrumentation channels provide appropriate compensatory measures for separate Functions. As such, a Note has been provided that allows separate Condition entry for each inoperable PAM Function.

(continued)



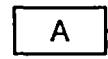
BASES

**APPLICABILITY
(continued)**

This LCO is not applicable in MODES 3, 4, and 5. In these MODES, the plant is already subcritical and in a condition of reduced Reactor Coolant System energy. Under these conditions, considerable time is available to restore necessary instrument control Functions if control room instruments or control becomes unavailable. Consequently, the TS do not require OPERABILITY in MODES 3, 4, and 5.

ACTIONS

A Note is included that excludes the MODE change restriction of LCO 3.0.4. This exception allows entry into an applicable MODE while relying on the ACTIONS even though the ACTIONS may eventually require a plant shutdown. This exception is acceptable due to the low probability of an event requiring this system.



Note 2 has been provided to modify the ACTIONS related to Remote Shutdown System Functions. 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 Remote Shutdown System Functions provide appropriate compensatory measures for separate Functions. As such, a Note has been provided that allows separate Condition entry for each inoperable Remote Shutdown System Function.

A.1

Condition A addresses the situation where one or more required Functions of the Remote Shutdown System is inoperable. This includes any Function listed in Reference 2, as well as the control and transfer switches.

The Required Action is to restore the Function to OPERABLE status within 30 days. The Completion Time is based on operating experience and the low probability of an event that would require evacuation of the control room.

(continued)



BASES

ACTIONS

A.1 (continued)

OPERABLE status (i.e., restore the LLS valve's initiation capability). If the inoperable channel(s) cannot be restored to OPERABLE status within the allowable out of service time, Condition D must be entered and its Required Action taken. The Required Actions do not allow placing the channel in trip since this action could result in an instrumented LLS valve actuation. The 24 hour Completion Time is considered appropriate because of the redundancy in the design (4 LLS valves are provided and any 1 LLS valve can perform the LLS function) and the very low probability of multiple LLS instrumentation channel failures, which render the remaining LLS S/RVs inoperable, occurring together with an event requiring the LLS function during the 24 hour Completion Time. The 24 hour Completion Time is also based on the reliability analysis of Reference 3.

B.1

Although the LLS circuitry is designed so that operation of a single tailpipe pressure switch will result in arming both LLS logics in its associated division, each tailpipe pressure switch provides a direct input to only one LLS logic (e.g., Logic A). Since each LLS logic normally receives at least five S/RV pressure switch inputs (and also receives the other S/RV signals from the other logic in the same division by an arming signal), the LLS logic and instrumentation remains capable of performing its safety function if any S/RV tailpipe pressure switch instrument channel becomes inoperable. Therefore, it is acceptable for plant operation to continue with only one tailpipe pressure switch OPERABLE on each S/RV. However, this is only acceptable provided each LLS valve is maintaining initiation capability. (Refer to Required Actions A.1 and D.1 Bases.)

Required Action B.1 requires restoration of the tailpipe pressure switches to OPERABLE status prior to entering MODE 2 or 3 from MODE 4 to ensure that all switches are OPERABLE at the beginning of a reactor startup (this is because the switches are not accessible during plant operation). The Required Actions do not allow placing the channel in trip since this action could result in a LLS valve actuation. ~~As noted, LCO 3.0.4 is not applicable, thus allowing entry into MODE 1 from MODE 2 with inoperable channels. This allowance is needed since the channels only have to be repaired prior to entering MODE 2 or MODE 3 from MODE 4. Yet, LCO 3.0.4 would preclude entry into MODE 1 from MODE 2 since the Required Action does not allow unlimited operations.~~

(continued)



BASES

ACTIONS

A.1 (continued)

- 2) With an inoperable sump monitoring system integrator, the sump can be manually pumped down and the time for pumpdown recorded. Utilizing pump flow rate, total gallons pumped is determined. Using time elapsed since last pumpdown, sump inleakage rate can be calculated.

B.1 and B.2

With both gaseous and particulate primary containment atmospheric monitoring channels inoperable (i.e., the required containment atmospheric monitoring system), grab samples of the primary containment atmosphere must be taken and an isotopic analysis performed to provide periodic leakage information. Provided a sample is obtained and analyzed once every 12 hours, the plant may be operated for up to 30 days to allow restoration of at least one of the required monitors.



The 12 hour interval provides periodic information that is adequate to detect LEAKAGE. The 30 day Completion Time for restoration recognizes that at least one other form of leakage detection is available.

The Required Actions are modified by a Note that states that the provisions of LCO 3.0.4 are not applicable. As a result, a MODE change is allowed when both the gaseous and particulate primary containment atmospheric monitoring channels are inoperable. This allowance is provided because other instrumentation is available to monitor RCS LEAKAGE.

C.1 and C.2

If any Required Action and associated Completion Time of Condition A or B cannot be met, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours and MODE 4 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to perform the actions in an orderly manner and without challenging plant systems.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)	site, such as the location of the site boundary and the meteorological conditions of the site. RCS specific activity satisfies Criterion 2 of the NRC Policy Statement (Ref. 4).
LCO	The specific iodine activity is limited to $\leq 0.2 \mu\text{Ci/gm}$ DOSE EQUIVALENT I-131. This limit ensures the source term assumed in the safety analysis for the MSLB is not exceeded, so any release of radioactivity to the environment during an MSLB is well within the 10 CFR 100 limits.
APPLICABILITY	In MODE 1, and MODES 2 and 3 with any main steam line not isolated, limits on the primary coolant radioactivity are applicable since there is an escape path for release of radioactive material from the primary coolant to the environment in the event of an MSLB outside of primary containment. In MODES 2 and 3 with the main steam lines isolated, such limits do not apply since an escape path does not exist. In MODES 4 and 5, no limits are required since the reactor is not pressurized and the potential for leakage is reduced.
ACTIONS	<u>A.1 and A.2</u> When the reactor coolant specific activity exceeds the LCO DOSE EQUIVALENT I-131 limit, but is $\leq 4.0 \mu\text{Ci/gm}$, samples must be analyzed for DOSE EQUIVALENT I-131 at least once every 4 hours. In addition, the specific activity must be restored to the LCO limit within 48 hours. The Completion Time of once every 4 hours is based on the time needed to take and analyze a sample. The 48 hour Completion Time to restore the activity level provides a reasonable time for temporary coolant activity increases (iodine spikes or crud bursts) to be cleaned up with the normal processing systems. <div style="border: 1px solid black; padding: 5px; margin-left: 20px;"><p>Insert B3</p><p>A Note to the Required Actions of Condition A excludes the MODE change restriction of LCO 3.0.4. This exception allows entry into the applicable MODE(S) while relying on the ACTIONS even though the ACTIONS may eventually require plant shutdown. This exception is acceptable due to the significant conservatism incorporated into the allowance</p></div> <p>(continued)</p>

BASES (continued)

ACTIONS

A Note to the ACTIONS excludes the MODE change restriction of LCO 3.0.4. This exception allows entry into the applicable MODE(S) while relying on the ACTIONS even though the ACTIONS may eventually require plant shutdown. This exception is acceptable due to the redundancy of the OPERABLE subsystems, the low pressure at which the plant is operating, the low probability of an event occurring during operation in this condition, and the availability of alternate methods of decay heat removal capability.

A second Note has been provided to modify the ACTIONS related to RHR shutdown cooling subsystems. Section 1.3, Completion Times, specifies 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 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 shutdown cooling subsystems provide appropriate compensatory measures for separate inoperable shutdown cooling subsystems. As such, a Note has been provided that allows separate Condition entry for each inoperable RHR shutdown cooling subsystem.

A.1, A.2, and A.3

With one required RHR shutdown cooling subsystem inoperable for decay heat removal, except as permitted by LCO Note 2, the inoperable subsystem must be restored to OPERABLE status without delay. In this condition, the remaining OPERABLE subsystem can provide the necessary decay heat removal. The overall reliability is reduced, however, because a single failure in the OPERABLE subsystem could result in reduced RHR shutdown cooling capability. Therefore, an alternate method of decay heat removal must be provided.

With both RHR shutdown cooling subsystems inoperable, an alternate method of decay heat removal must be provided in addition to that provided for the initial RHR shutdown cooling subsystem inoperability. This re-establishes backup decay heat removal capabilities, similar to the requirements of the LCO. The 1 hour Completion Time is based on the decay heat removal function and the probability of a loss of the available decay heat removal capabilities.

The required cooling capacity of the alternate method should be ensured by verifying (by calculation or demonstration) its capability to

(continued)



BASES

LCO (continued) subsystems and ADS must therefore be OPERABLE to satisfy the single failure criterion required by Reference 10. (Reference 9 takes no credit for HPCI.) HPCI must be OPERABLE due to risk consideration.

LPCI subsystems may be considered OPERABLE during alignment and operation for decay heat removal when below the actual RHR low pressure permissive pressure in MODE 3, if capable of being manually realigned (remote or local) to the LPCI mode and not otherwise inoperable. At these low pressures and decay heat levels, a reduced complement of ECCS subsystems should provide the required core cooling, thereby allowing operation of RHR shutdown cooling when necessary.

APPLICABILITY All ECCS subsystems are required to be OPERABLE during MODES 1, 2, and 3, when there is considerable energy in the reactor core and core cooling would be required to prevent fuel damage in the event of a break in the primary system piping. In MODES 2 and 3, when reactor steam dome pressure is \leq 150 psig, ADS and HPCI are not required to be OPERABLE because the low pressure ECCS subsystems can provide sufficient flow below this pressure. ECCS requirements for MODES 4 and 5 are specified in LCO 3.5.2, "ECCS - Shutdown."

ACTIONS

A.1

Insert B4

If any one low pressure ECCS injection/spray subsystem is inoperable, the inoperable subsystem must be restored to OPERABLE status within 7 days. In this condition, the remaining OPERABLE subsystems provide adequate core cooling during a LOCA. However, overall ECCS reliability is reduced, because a single failure in one of the remaining OPERABLE subsystems, concurrent with a LOCA, may result in the ECCS not being able to perform its intended safety function. The 7 day Completion Time is based on a reliability study (Ref. 11) that evaluated the impact on ECCS availability, assuming various components and subsystems were taken out of service. The results were used to calculate the average availability of ECCS equipment needed to mitigate the consequences of a LOCA as a function of allowed outage times (i.e., Completion Times).

(continued)

BASES

BACKGROUND (continued)

when other discharge line valves are closed. To ensure rapid delivery of water to the RPV and to minimize water hammer effects, the RCIC System discharge piping is kept full of water. The RCIC System is normally aligned to the CST. The height of water in the CST is sufficient to maintain the piping full of water up to the first isolation valve. The relative height of the feedwater line connection for RCIC is such that the water in the feedwater lines keeps the remaining portion of the RCIC discharge line full of water. Therefore, RCIC does not require a "keep fill" system.

APPLICABLE SAFETY ANALYSES

The function of the RCIC System is to respond to transient events by providing makeup coolant to the reactor. The RCIC System is not an Engineered Safety Feature System and no credit is taken in the safety analyses for RCIC System operation. Based on its contribution to the reduction of overall plant risk, however, the system satisfies Criterion 4 of the NRC Policy Statement (Ref. 5).

LCO

The OPERABILITY of the RCIC System provides adequate core cooling such that actuation of any of the low pressure ECCS subsystems is not required in the event of RPV isolation accompanied by a loss of feedwater flow. The RCIC System has sufficient capacity for maintaining RPV inventory during an isolation event.

APPLICABILITY

The RCIC System is required to be OPERABLE during MODE 1, and MODES 2 and 3 with reactor steam dome pressure > 150 psig, since RCIC is the primary non-ECCS water source for core cooling when the reactor is isolated and pressurized. In MODES 2 and 3 with reactor steam dome pressure ≤ 150 psig, and in MODES 4 and 5, RCIC is not required to be OPERABLE since the low pressure ECCS injection/spray subsystems can provide sufficient flow to the RPV.

ACTIONS

Insert B5

A.1 and A.2

If the RCIC System is inoperable during MODE 1, or MODE 2 or 3 with reactor steam dome pressure > 150 psig, and the HPCI System is verified to be OPERABLE, the RCIC System must be restored to OPERABLE status within 14 days. In this condition, loss of the RCIC System will not affect the overall plant capability to provide makeup

(continued)

BASES

ACTIONS

A.1 (continued)

control function. However, the overall reliability is reduced because a single failure in the OPERABLE subsystem could result in reduced oxygen control capability. The 30 day Completion Time is based on the low probability of the occurrence of a LOCA that would generate hydrogen and oxygen in amounts capable of exceeding the flammability limit, the amount of time available after the event for operator action to prevent exceeding this limit, and the availability of the OPERABLE CAD subsystem and other hydrogen mitigating systems.

Required Action A.1 has been modified by a Note that indicates that the provisions of LCO 3.0.4 are not applicable. As a result, a MODE change is allowed when one CAD subsystem is inoperable. This allowance is provided because of the low probability of the occurrence of a LOCA that would generate hydrogen and oxygen in amounts capable of exceeding the flammability limit, the low probability of the failure of the OPERABLE subsystem, the amount of time available after a postulated LOCA for operator action to prevent exceeding the flammability limit, and the availability of other hydrogen mitigating systems.

B.1 and B.2

With two CAD subsystems inoperable, the ability to perform the hydrogen control function via alternate capabilities must be verified by administrative means within 1 hour. The alternate hydrogen control capabilities are provided by the Primary Containment Purge System. The 1 hour Completion Time allows a reasonable period of time to verify that a loss of hydrogen control function does not exist. In addition, the alternate hydrogen control system capability must be verified once per 12 hours thereafter to ensure its continued availability. Both the initial verification and all subsequent verifications may be performed as an administrative check by examining logs or other information to determine the availability of the alternate hydrogen control system. It does not mean to perform the surveillances needed to demonstrate OPERABILITY of the alternate hydrogen control system. If the ability to perform the hydrogen control function is maintained, continued operation is permitted with two CAD subsystems inoperable for up to 7 days. Seven days is a reasonable time to allow two CAD subsystems to be inoperable because the hydrogen control function is maintained and because of the low probability of the occurrence of a LOCA that would generate hydrogen in amounts capable of exceeding the flammability limit.

(continued)



BASES

LCO
(continued) An adequate suction source is not addressed in this LCO since the minimum net positive suction head (59 ft mean sea level in the pump well) is bounded by the plant service water pump requirements [LCO 3.7.2, "Plant Service Water (PSW) System and Ultimate Heat Sink (UHS)"].

APPLICABILITY In MODES 1, 2, and 3, the RHRSW System is required to be OPERABLE to support the OPERABILITY of the RHR System for primary containment cooling [LCO 3.6.2.3, "Residual Heat Removal (RHR) Suppression Pool Cooling," and LCO 3.6.2.4, "Residual Heat Removal (RHR) Suppression Pool Spray"] and decay heat removal [LCO 3.4.7, "Residual Heat Removal (RHR) Shutdown Cooling System - Hot Shutdown"]. The Applicability is therefore consistent with the requirements of these systems.

In MODES 4 and 5, the OPERABILITY requirements of the RHRSW System are determined by the systems it supports, and therefore, the requirements are not the same for all facets of operation in MODES 4 and 5. Thus, the LCOs of the RHR Shutdown Cooling System (LCO 3.4.8, "RHR Shutdown Cooling System - Cold Shutdown," LCO 3.9.7, "RHR - High Water Level," and LCO 3.9.8, "RHR - Low Water Level"), which require portions of the RHRSW System to be OPERABLE, will govern RHRSW System requirements during operation in MODES 4 and 5.

ACTIONS A.1

With one RHRSW pump inoperable, the inoperable pump must be restored to OPERABLE status within 30 days. With the unit in this condition, the remaining OPERABLE RHRSW pumps are adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure in the OPERABLE subsystem could result in reduced RHRSW capability. The 30 day Completion Time is based on the remaining RHRSW heat removal capability, including enhanced reliability afforded by manual cross connect capability, and the low probability of a DBA with concurrent worst case single failure.

Required Action A.1 has been modified by a Note that indicates that the provisions of LCO 3.0.4 are not applicable. As a result, a MODE change is allowed when one RHRSW pump is inoperable. This allowance is provided because of the low probability of the

(continued)

BASES

ACTIONS

A.1 (continued)

occurrence of a LOCA and the redundancy of the remaining portions of the System.

B.1

With one RHRSW pump inoperable in each subsystem, if no additional failures occur in the RHRSW System, and the two OPERABLE pumps are aligned by opening the normally closed cross tie valves (i.e., after an event requiring operation of the RHRSW System), then the remaining OPERABLE pumps and flow paths provide adequate heat removal capacity following a design basis LOCA. However, capability for this alignment is not assumed in long term containment response analysis and an additional single failure in the RHRSW System could reduce the system capacity below that assumed in the safety analysis. Therefore, continued operation is permitted only for a limited time. One inoperable pump is required to be restored to OPERABLE status within 7 days. The 7 day Completion Time for restoring one inoperable RHRSW pump to OPERABLE status is based on engineering judgment, considering the level of redundancy provided.

C.1

Required Action C.1 is intended to handle the inoperability of one RHRSW subsystem for reasons other than Condition A. The Completion Time of 7 days is allowed to restore the RHRSW subsystem to OPERABLE status. With the unit in this condition, the remaining OPERABLE RHRSW subsystem is adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure in the OPERABLE RHRSW subsystem could result in loss of RHRSW function. The Completion Time is based on the redundant RHRSW capabilities afforded by the OPERABLE subsystem and the low probability of an event occurring requiring RHRSW during this period.

The Required Action is modified by a Note indicating that the applicable Conditions of LCO 3.4.7 be entered and Required Actions taken if the inoperable RHRSW subsystem results in an inoperable RHR shutdown cooling subsystem. This is an exception to LCO 3.0.6 and ensures the proper actions are taken for these components.

(continued)

BASES

APPLICABILITY (continued)

In MODES 4 and 5, and defueled the OPERABILITY requirements of the PSW System and UHS are determined by the systems they support and therefore, the requirements are not the same for all facets of operation in MODES 4 and 5 and defueled. Thus, the LCOs of the individual systems, which require portions of the PSW System and the UHS to be OPERABLE, will govern PSW System and UHS requirements during operation in MODES 4 and 5 and defueled.

ACTIONS

A.1

With one PSW pump inoperable, the inoperable pump must be restored to OPERABLE status within 30 days. With the unit in this condition, the remaining OPERABLE PSW pumps (even allowing for an additional single failure) are adequate to perform the PSW heat removal function; however, the overall reliability is reduced. The 30 day Completion Time is based on the remaining PSW heat removal capability to accommodate additional single failures, and the low probability of an event occurring during this time period.

Required Action A.1 has been modified by a Note that indicates that the provisions of LCO 3.0.4 are not applicable. As a result, a MODE change is allowed when one PSW pump is inoperable. This allowance is provided because of the low probability of the occurrence of a LOCA and the redundancy of the remaining portions of the System.

B.1

With one PSW turbine building isolation valve inoperable, the inoperable valve must be restored to OPERABLE status within 30 days. With the unit in this condition, the remaining OPERABLE PSW turbine building isolation valve in the subsystem is adequate to isolate the non-essential loads, and, even allowing for an additional single failure, the other PSW subsystem is adequate to perform the PSW heat removal function; however, the overall reliability is reduced. The 30 day Completion Time is based on the remaining PSW heat removal capability to accommodate additional single failures, and the low probability of an event occurring during this time period.

Required Action B.1 has been modified by a Note that indicates that the provisions of LCO 3.0.4 are not applicable. As a result, a MODE change is allowed when one PSW turbine building isolation valve is inoperable. This allowance is provided because of the low

(continued)

BASES

ACTIONS

B.1 (continued)

probability of the occurrence of a LOCA and the redundancy of the remaining portions of the System.

C.1

With one PSW pump inoperable in each subsystem, one inoperable pump must be restored to OPERABLE status within 7 days. With the unit in this condition, the remaining OPERABLE PSW pumps are adequate to perform the PSW heat removal function; however, the overall reliability is reduced. The 7 day Completion Time is based on the remaining PSW heat removal capability to accommodate an additional single failure and the low probability of an event occurring during this time period.

Required Action C.1 has been modified by a Note that indicates that the provisions of LCO 3.0.4 are not applicable. As a result, a MODE change is allowed when one PSW pump in each subsystem is inoperable. This allowance is provided because of the low probability of the occurrence of a LOCA and the redundancy of the remaining portions of the System.

D.1

With one PSW turbine building isolation valve inoperable in each subsystem, one inoperable valve must be restored to OPERABLE status within 72 hours. With the unit in this condition, the remaining OPERABLE PSW valves are adequate to perform the PSW nonessential load isolation function; however, the overall reliability is reduced. The 72 hour Completion Time is based on the remaining PSW heat removal capability to accommodate an additional single failure and the low probability of an event occurring during this time period.

E.1

With one PSW subsystem inoperable for reasons other than Condition A and Condition B (e.g., inoperable flow path, both pumps inoperable in a loop, or both turbine building isolation valves inoperable in a loop), the PSW subsystem must be restored to OPERABLE status within 72 hours. With the unit in this condition, the remaining OPERABLE PSW subsystem is adequate to perform the

(continued)

BASES (continued)

APPLICABILITY The requirements for OPERABILITY of the DG 1B SSW System are governed by the required OPERABILITY of the DG 1B (LCO 3.8.1, "AC Sources - Operating," and LCO 3.8.2, "AC Sources - Shutdown").

ACTIONS A.1, A.2, and A.3

The Required Actions are modified by a Note indicating that the LCO 3.0.4 does not apply. As a result, a MODE change is allowed when the DG 1B SSW System is inoperable, provided the DG 1B has an adequate cooling water supply from the Unit 1 PSW.

If the DG 1B SSW System is inoperable, the OPERABILITY of the DG 1B is affected due to loss of its cooling source; however, the capability exists to provide cooling to DG 1B from the PSW System of Unit 1. Continued operation is allowed for 60 days if the OPERABILITY of a Unit 1 PSW System, with respect to its capability to provide cooling to the DG 1B, can be verified. This is accomplished by aligning cooling water to DG 1B from the Unit 1 PSW System within 8 hours and verifying this lineup once every 31 days. The 8 hour Completion Time is based on the time required to reasonably complete the Required Action, and the low probability of an event occurring requiring DG 1B during this period. The 31 day verification of the Unit 1 PSW lineup to the DG 1B is consistent with the PSW valve lineup SR. The 60 day Completion Time to restore the DG 1B SSW System to OPERABLE status allows sufficient time to repair the system, yet prevents indefinite operation with cooling water provided from the Unit 1 PSW System.

B.1

If cooling water cannot be made available to the DG 1B within the 8 hour Completion Time, or if cooling water cannot be verified to be aligned to DG 1B from a Unit 1 PSW subsystem as required by the 31 day verification Required Action, the DG 1B cannot perform its intended function and must be immediately declared inoperable. In accordance with LCO 3.0.6, this also requires entering into the Applicable Conditions and Required Actions for LCO 3.8.1 or LCO 3.8.2. Additionally, if the DG 1B SSW System is not restored to OPERABLE status within 60 days, DG 1B must be immediately declared inoperable.

(continued)

BASES

LCO
(continued)

Proper sequencing of loads, including tripping of nonessential loads, is a required function for DG OPERABILITY.

The AC sources must be separate and independent (to the extent possible) (Ref. 1) of other AC sources. For the DGs, the separation and independence are complete. For the offsite AC sources, the separation and independence are to the extent practical. A circuit may be connected to more than one ESF bus, with automatic transfer capability to the other circuit OPERABLE, and not violate separation criteria. A circuit that is not connected to an ESF bus is required to have OPERABLE automatic transfer capability to at least two ESF buses (one of which must be to the 1F bus) to support OPERABILITY of that circuit.

APPLICABILITY

The AC sources are required to be OPERABLE in MODES 1, 2, and 3 to ensure that:

- a. Acceptable fuel design limits and reactor coolant pressure boundary limits are not exceeded as a result of AOOs or abnormal transients; and
- b. Adequate core cooling is provided and containment OPERABILITY and other vital functions are maintained in the event of a postulated DBA.

The AC power requirements for MODES 4 and 5 and other conditions in which AC Sources are required, are covered in LCO 3.8.2, "AC Sources - Shutdown."

ACTIONS

Insert B6

A.1

To ensure a highly reliable power source remains with one offsite circuit inoperable, it is necessary to verify the availability of the remaining required offsite circuits on a more frequent basis. Since the Required Action only specifies "perform," a failure of SR 3.8.1.1 acceptance criteria does not result in a Required Action not met. However, if a second required circuit fails SR 3.8.1.1, the second offsite circuit is inoperable, and Condition D, for two offsite circuits inoperable, is entered.

(continued)



BASES (continued)

LCO 3.0.4

Insert B1

LCO 3.0.4 establishes limitations on changes in MODES or other specified conditions in the Applicability when an LCO is not met. It precludes placing the unit in a MODE or other specified condition stated in that Applicability (e.g., Applicability desired to be entered) when the following exist:

- a. Unit conditions are such that the requirements of the LCO would not be met in the Applicability desired to be entered; and
- b. Continued noncompliance with the LCO requirements, if the Applicability were entered, would result in the unit being required to exit the Applicability desired to be entered to comply with the Required Actions.

Compliance with Required Actions that permit continued operation of the unit for an unlimited period of time in a MODE or other specified condition provides an acceptable level of safety for continued operation. This is without regard to the status of the unit before or after the MODE change. Therefore, in such cases, entry into a MODE or other specified condition in the Applicability may be made in accordance with the provisions of the Required Actions. The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

The provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown.

Exceptions to LCO 3.0.4 are stated in the individual Specifications. Exceptions may apply to all the ACTIONS or to a specific Required Action of a Specification.

LCO 3.0.4 is only applicable when entering MODE 3 from MODE 4, MODE 2 from MODE 3 or 4, or MODE 1 from MODE 2. Furthermore, LCO 3.0.4 is applicable when entering any other specified condition in the Applicability only while operating in MODE 1, 2 or 3. The requirements of LCO 3.0.4 do not apply in MODES 4 and 5, or in other specified conditions of the Applicability (unless in MODE 1, 2, or 3) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.

(continued)

BASES

LCO 3.0.4
(continued)

Surveillances do not have to be performed on the associated inoperable equipment (or on variables outside the specified limits), as permitted by SR 3.0.1. Therefore, changing MODES or other specified conditions while/in an ACTIONS Condition, either in compliance with LCO 3.0.4 or where an exception to LCO 3.0.4 is stated, is not a violation of SR 3.0.1 or SR 3.0.4 for those surveillances that do not have to be performed due to the associated inoperable equipment. However, SRs must be met to ensure OPERABILITY prior to declaring the associated equipment OPERABLE (or variable within limits) and restoring compliance with the affected LCO.

LCO 3.0.5

LCO 3.0.5 establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS. The sole purpose of this Specification is to provide an exception to LCO 3.0.2 [e.g., to not comply with the applicable Required Action(s)] to allow the performance of SRs to demonstrate:

- a. The OPERABILITY of the equipment being returned to service; or
- b. The OPERABILITY of other equipment.

The administrative controls ensure the time the equipment is returned to service in conflict with the requirements of the ACTIONS is limited to the time absolutely necessary to perform the allowed SRs. This Specification does not provide time to perform any other preventive or corrective maintenance.

An example of demonstrating the OPERABILITY of the equipment being returned to service is reopening a containment isolation valve that has been closed to comply with Required Actions and must be reopened to perform the SRs.

An example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of an SR on another channel in the other trip system. A similar example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to permit the logic to function and indicate the appropriate response during the performance of an SR on another channel in the same trip system.

(continued)

BASES

SR 3.0.3 (continued)

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon the failure of the Surveillance.

Completion of the Surveillance within the delay period allowed by this Specification, or within the Completion Time of the ACTIONS, restores compliance with SR 3.0.1.

SR 3.0.4

SR 3.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified condition in the Applicability. This Specification ensures that system and component OPERABILITY requirements and variable limits are met before entry into MODES or other specified conditions in the Applicability for which these systems and components ensure safe operation of the unit.

However, in certain circumstances, failing to meet an SR will not result in SR 3.0.4 restricting a MODE change or other specified condition change. When a system, subsystem, division, component, device, or variable is inoperable or outside its specified limits, the associated SR(s) are not required to be performed per SR 3.0.1, which states that surveillances do not have to be performed on inoperable equipment. When equipment is inoperable, SR 3.0.4 does not apply to the associated SR(s) since the requirement for the SR(s) to be performed is removed. Therefore, failing to perform the Surveillance(s) within the specified Frequency, on equipment that is inoperable, does not result in an SR 3.0.4 restriction to changing MODES or other specified conditions of the Applicability. However, since the LCO is not met in this instance, LCO 3.0.4 will govern any restrictions that may (or may not) apply to MODE or other specified condition changes.

The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

Insert B2

(continued)

BASES

SR 3.0.4
(continued)

The provisions of SR 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of SR 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown.

The precise requirements for performance of SRs are specified such that exceptions to SR 3.0.4 are not necessary. The specific time frames and conditions necessary for meeting the SRs are specified in the Frequency, in the Surveillance, or both. This allows performance of Surveillances when the prerequisite condition(s) specified in a Surveillance procedure require entry into the MODE or other specified condition in the Applicability of the associated LCO prior to the performance or completion of a Surveillance. A Surveillance that could not be performed until after entering the LCO Applicability would have its Frequency specified such that it is not "due" until the specific conditions needed are met. Alternately, the Surveillance may be stated in the form of a Note as not required (to be met or performed) until a particular event, condition, or time has been reached. Further discussion of the specific formats of SRs' annotation is found in Section 1/4, Frequency.

SR 3.0.4 is only applicable when entering MODE 3 from MODE 4, MODE 2 from MODE 3 or 4, or MODE 1 from MODE 2. Furthermore, SR 3.0.4 is applicable when entering any other specified condition in the Applicability only while operating in MODE 1, 2, or 3. The requirements of SR 3.0.4 do not apply in MODES 4 and 5, or in other specified conditions of the Applicability (unless in MODE 1, 2, or 3) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.

BASES

LCO
(continued)

12. RHR Service Water Flow

RHR service water flow is a Type A variable provided to support the containment cooling function. The RHR Service Water flow signals are transmitted from separate flow transmitters (one per subsystem) and are continuously read on two control room indicators. These indicators are the primary indication used by the operator during an accident. Therefore, the PAM specification deals specifically with this portion of the instrument channel.

APPLICABILITY

The PAM instrumentation LCO is applicable in MODES 1 and 2. These variables are related to the diagnosis and preplanned actions required to mitigate DBAs. The applicable DBAs are assumed to occur in MODES 1 and 2. In MODES 3, 4, and 5, plant conditions are such that the likelihood of an event that would require PAM instrumentation is extremely low; therefore, PAM instrumentation is not required to be OPERABLE in these MODES.

ACTIONS

Note 1 has been added to the ACTIONS to exclude the MODE change restriction of LCO 3.0.4. This exception allows entry into the applicable MODE while relying on the ACTIONS even though the ACTIONS may eventually require plant shutdown. This exception is acceptable due to the passive function of the instruments, the operator's ability to diagnose an accident using alternative instruments and methods, and the low probability of an event requiring these instruments.

A

Note 2 has been provided to modify the ACTIONS related to PAM 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 PAM instrumentation channels provide appropriate compensatory measures for separate Functions. As such, a Note has been provided that allows separate Condition entry for each inoperable PAM Function.

(continued)

BASES

APPLICABILITY (continued)

This LCO is not applicable in MODES 3, 4, and 5. In these MODES, the plant is already subcritical and in a condition of reduced Reactor Coolant System energy. Under these conditions, considerable time is available to restore necessary instrument control Functions if control room instruments or control becomes unavailable. Consequently, the TS do not require OPERABILITY in MODES 3, 4, and 5.

ACTIONS

A Note is included that excludes the MODE change restriction of LCO 3.0.4. This exception allows entry into an applicable MODE while relying on the ACTIONS even though the ACTIONS may eventually require a plant shutdown. This exception is acceptable due to the low probability of an event requiring this system.

A

Note 2 has been provided to modify the ACTIONS related to Remote Shutdown System Functions. 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 Remote Shutdown System Functions provide appropriate compensatory measures for separate Functions. As such, a Note has been provided that allows separate Condition entry for each inoperable Remote Shutdown System Function.

A.1

Condition A addresses the situation where one or more required Functions of the Remote Shutdown System is inoperable. This includes any Function listed in Reference 2, as well as the control and transfer switches.

The Required Action is to restore the Function to OPERABLE status within 30 days. The Completion Time is based on operating experience and the low probability of an event that would require evacuation of the control room.

(continued)

BASES

ACTIONS

A.1 (continued)

OPERABLE status (i.e., restore the LLS valve's initiation capability). If the inoperable channel(s) cannot be restored to OPERABLE status within the allowable out of service time, Condition D must be entered and its Required Action taken. The Required Actions do not allow placing the channel in trip since this action could result in an instrumented LLS valve actuation. The 24 hour Completion Time is considered appropriate because of the redundancy in the design (4 LLS valves are provided and any 1 LLS valve can perform the LLS function) and the very low probability of multiple LLS instrumentation channel failures, which render the remaining LLS S/RVs inoperable, occurring together with an event requiring the LLS function during the 24 hour Completion Time. The 24 hour Completion Time is also based on the reliability analysis of Reference 3.

B.1

Although the LLS circuitry is designed so that operation of a single tailpipe pressure switch will result in arming both LLS logics in its associated division, each tailpipe pressure switch provides a direct input to only one LLS logic (e.g., Logic A). Since each LLS logic normally receives at least five S/RV pressure switch inputs (and also receives the other S/RV signals from the other logic in the same division by an arming signal), the LLS logic and instrumentation remains capable of performing its safety function if any S/RV tailpipe pressure switch instrument channel becomes inoperable. Therefore, it is acceptable for plant operation to continue with only one tailpipe pressure switch OPERABLE on each S/RV. However, this is only acceptable provided each LLS valve is maintaining initiation capability. (Refer to Required Actions A.1 and D.1 Bases.)

Required Action B.1 requires restoration of the tailpipe pressure switches to OPERABLE status prior to entering MODE 2 or 3 from MODE 4 to ensure that all switches are OPERABLE at the beginning of a reactor startup (this is because the switches are not accessible during plant operation). The Required Actions do not allow placing the channel in trip since this action could result in a LLS valve actuation. As noted, LCO 3.0.4 is not applicable, thus allowing entry

~~into MODE 1 from MODE 2 with inoperable channels. This allowance is needed since the channels only have to be repaired prior to entering MODE 2 or MODE 3 from MODE 4. Yet, LCO 3.0.4 would preclude entry into MODE 1 from MODE 2 since the Required Action does not allow unlimited operations.~~

(continued)

BASES**ACTIONS**A.1 (continued)

- 2) With an inoperable sump monitoring system integrator, the sump can be manually pumped down and the time for pumpdown recorded. Utilizing pump flow rate, total gallons pumped is determined. Using time elapsed since last pumpdown, sump inleakage rate can be calculated.

B.1 and B.2

With both gaseous and particulate primary containment atmospheric monitoring channels inoperable (i.e., the required containment atmospheric monitoring system), grab samples of the primary containment atmosphere must be taken and an isotopic analysis performed to provide periodic leakage information. Provided a sample is obtained and analyzed once every 12 hours, the plant may be operated for up to 30 days to allow restoration of at least one of the required monitors.

The 12 hour interval provides periodic information that is adequate to detect LEAKAGE. The 30 day Completion Time for restoration recognizes that at least one other form of leakage detection is available.

The Required Actions are modified by a Note that states that the provisions of LCO 3.0.4 are not applicable. As a result, a MODE change is allowed when both the gaseous and particulate primary containment atmospheric monitoring channels are inoperable. This allowance is provided because other instrumentation is available to monitor RCS leakage.

C.1 and C.2

If any Required Action and associated Completion Time of Condition A or B cannot be met, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours and MODE 4 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to perform the actions in an orderly manner and without challenging plant systems.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued) site, such as the location of the site boundary and the meteorological conditions of the site.
RCS specific activity satisfies Criterion 2 of the NRC Policy Statement (Ref. 4).

LCO The specific iodine activity is limited to $\leq 0.2 \mu\text{Ci/gm}$ DOSE EQUIVALENT I-131. This limit ensures the source term assumed in the safety analysis for the MSLB is not exceeded, so any release of radioactivity to the environment during an MSLB is well within the 10 CFR 100 limits.

APPLICABILITY In MODE 1, and MODES 2 and 3 with any main steam line not isolated, limits on the primary coolant radioactivity are applicable since there is an escape path for release of radioactive material from the primary coolant to the environment in the event of an MSLB outside of primary containment.

In MODES 2 and 3 with the main steam lines isolated, such limits do not apply since an escape path does not exist. In MODES 4 and 5, no limits are required since the reactor is not pressurized and the potential for leakage is reduced.

ACTIONS A.1 and A.2

When the reactor coolant specific activity exceeds the LCO DOSE EQUIVALENT I-131 limit, but is $\leq 4.0 \mu\text{Ci/gm}$, samples must be analyzed for DOSE EQUIVALENT I-131 at least once every 4 hours. In addition, the specific activity must be restored to the LCO limit within 48 hours. The Completion Time of once every 4 hours is based on the time needed to take and analyze a sample. The 48 hour Completion Time to restore the activity level provides a reasonable time for temporary coolant activity increases (iodine spikes or crud bursts) to be cleaned up with the normal processing systems.

Insert B3

A Note to the Required Actions of Condition A excludes the MODE change restriction of LCO 3.0.4. This exception allows entry into the applicable MODE(S) while relying on the ACTIONS even though the ACTIONS may eventually require plant shutdown. This exception is acceptable due to the significant conservatism incorporated into the

allowance

(continued)

BASES (continued)

ACTIONS

A Note to the ACTIONS excludes the MODE change restriction of LCO 3.0.4. This exception allows entry into the applicable MODE(S) while relying on the ACTIONS even though the ACTIONS may eventually require plant shutdown. This exception is acceptable due to the redundancy of the OPERABLE subsystems, the low pressure at which the plant is operating, the low probability of an event occurring during operation in this condition, and the availability of alternate methods of decay heat removal capability.

A second Note has been provided to modify the ACTIONS related to RHR shutdown cooling subsystems. Section 1.3, Completion Times, specifies 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 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 shutdown cooling subsystems provide appropriate compensatory measures for separate inoperable shutdown cooling subsystems. As such, a Note has been provided that allows separate Condition entry for each inoperable RHR shutdown cooling subsystem.

A.1, A.2, and A.3

With one required RHR shutdown cooling subsystem inoperable for decay heat removal, except as permitted by LCO Note 2, the inoperable subsystem must be restored to OPERABLE status without delay. In this condition, the remaining OPERABLE subsystem can provide the necessary decay heat removal. The overall reliability is reduced, however, because a single failure in the OPERABLE subsystem could result in reduced RHR shutdown cooling capability. Therefore, an alternate method of decay heat removal must be provided.

With both RHR shutdown cooling subsystems inoperable, an alternate method of decay heat removal must be provided in addition to that provided for the initial RHR shutdown cooling subsystem inoperability. This re-establishes backup decay heat removal capabilities, similar to the requirements of the LCO. The 1 hour Completion Time is based on the decay heat removal function and the probability of a loss of the available decay heat removal capabilities.

The required cooling capacity of the alternate method should be ensured by verifying (by calculation or demonstration) its capability to

(continued)

BASES

LCO
(continued)

subsystems and ADS must therefore be OPERABLE to satisfy the single failure criterion required by Reference 11. (Reference 10 takes no credit for HPCI.) HPCI must be OPERABLE due to risk consideration.

LPCI subsystems may be considered OPERABLE during alignment and operation for decay heat removal when below the actual RHR low pressure permissive pressure in MODE 3, if capable of being manually realigned (remote or local) to the LPCI mode and not otherwise inoperable. At these low pressures and decay heat levels, a reduced complement of ECCS subsystems should provide the required core cooling, thereby allowing operation of RHR shutdown cooling when necessary.

APPLICABILITY

All ECCS subsystems are required to be OPERABLE during MODES 1, 2, and 3, when there is considerable energy in the reactor core and core cooling would be required to prevent fuel damage in the event of a break in the primary system piping. In MODES 2 and 3, when reactor steam dome pressure is ≤ 150 psig, ADS and HPCI are not required to be OPERABLE because the low pressure ECCS subsystems can provide sufficient flow below this pressure. ECCS requirements for MODES 4 and 5 are specified in LCO 3.5.2, "ECCS - Shutdown."

ACTIONS

Insert B4

A.1

If any one low pressure ECCS injection/spray subsystem is inoperable, the inoperable subsystem must be restored to OPERABLE status within 7 days. In this condition, the remaining OPERABLE subsystems provide adequate core cooling during a LOCA. However, overall ECCS reliability is reduced, because a single failure in one of the remaining OPERABLE subsystems, concurrent with a LOCA, may result in the ECCS not being able to perform its intended safety function. The 7 day Completion Time is based on a reliability study (Ref. 12) that evaluated the impact on ECCS availability, assuming various components and subsystems were taken out of service. The results were used to calculate the average availability of ECCS equipment needed to mitigate the consequences of a LOCA as a function of allowed outage times (i.e., Completion Times).

(continued)

BASES

BACKGROUND (continued)	when other discharge line valves are closed. To ensure rapid delivery of water to the RPV and to minimize water hammer effects, the RCIC System discharge piping is kept full of water. The RCIC System is normally aligned to the CST. The height of water in the CST is sufficient to maintain the piping full of water up to the first isolation valve. The relative height of the feedwater line connection for RCIC is such that the water in the feedwater lines keeps the remaining portion of the RCIC discharge line full of water. Therefore, RCIC does not require a "keep fill" system.
APPLICABLE SAFETY ANALYSES	The function of the RCIC System is to respond to transient events by providing makeup coolant to the reactor. The RCIC System is not an Engineered Safety Feature System and no credit is taken in the safety analyses for RCIC System operation. Based on its contribution to the reduction of overall plant risk, however, the system satisfies Criterion 4 of the NRC Policy Statement (Ref. 5).
LCO	The OPERABILITY of the RCIC System provides adequate core cooling such that actuation of any of the low pressure ECCS subsystems is not required in the event of RPV isolation accompanied by a loss of feedwater flow. The RCIC System has sufficient capacity for maintaining RPV inventory during an isolation event.
APPLICABILITY	The RCIC System is required to be OPERABLE during MODE 1, and MODES 2 and 3 with reactor steam dome pressure > 150 psig, since RCIC is the primary non-ECCS water source for core cooling when the reactor is isolated and pressurized. In MODES 2 and 3 with reactor steam dome pressure ≤ 150 psig, and in MODES 4 and 5, RCIC is not required to be OPERABLE since the low pressure ECCS injection/spray subsystems can provide sufficient flow to the RPV.
ACTIONS	<p><u>A.1 and A.2</u></p> <p>Insert B5</p> <p>If the RCIC System is inoperable during MODE 1, or MODE 2 or 3 with reactor steam dome pressure > 150 psig, and the HPCI System is verified to be OPERABLE, the RCIC System must be restored to OPERABLE status within 14 days. In this condition, loss of the RCIC System will not affect the overall plant capability to provide makeup</p>

(continued)

BASES

ACTIONS

A.1 (continued)

Required Action A.1 has been modified by a Note indicating that the provisions of LCO 3.0.4 are not applicable. As a result, a MODE change is allowed when one required Drywell Cooling System fan is inoperable. This allowance is provided because of the low probability of the occurrence of a LOCA that would generate hydrogen in amounts capable of exceeding the flammability limit, the low probability of the failure of the OPERABLE fan, and the amount of time available after a postulated LOCA for operator action to prevent exceeding the flammability limit.

B.1

With two Drywell Cooling System fans inoperable, one fan must be restored to OPERABLE status within 7 days. Seven days is a reasonable time to allow two Drywell Cooling System fans to be inoperable because the hydrogen mixing function is maintained via natural circulation and because of the low probability of the occurrence of a LOCA that would generate hydrogen in amounts capable of exceeding the flammability limit.

C.1

If any Required Action and associated Completion Time cannot be met, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours. The allowed Completion Time of 12 hours is reasonable, based on operating experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE REQUIREMENTS

SR 3.6.3.3.1

Operating each required Drywell Cooling System fan for ≥ 15 minutes ensures that each subsystem is OPERABLE and that all associated controls are functioning properly. It also ensures that blockage, fan or motor failure, or excessive vibration can be detected for corrective action.

(continued)

BASES

ACTIONS

A.1 (continued)

capability, including enhanced reliability afforded by manual cross connect capability, and the low probability of a DBA with concurrent worst case single failure.

Required Action A.1 has been modified by a Note that indicates that the provisions of LCO 3.0.4 are not applicable. As a result, a MODE change is allowed when one RHRSW pump is inoperable. This allowance is provided because of the low probability of the occurrence of a LOCA and the redundancy of the remaining portions of the System.

B.1

With one RHRSW pump inoperable in each subsystem, if no additional failures occur in the RHRSW System, and the two OPERABLE pumps are aligned by opening the normally closed cross tie valves (i.e., after an event requiring operation of the RHRSW System), then the remaining OPERABLE pumps and flow paths provide adequate heat removal capacity following a design basis LOCA. However, capability for this alignment is not assumed in long term containment response analysis and an additional single failure in the RHRSW System could reduce the system capacity below that assumed in the safety analysis. Therefore, continued operation is permitted only for a limited time. One inoperable pump is required to be restored to OPERABLE status within 7 days. The 7 day Completion Time for restoring one inoperable RHRSW pump to OPERABLE status is based on engineering judgment, considering the level of redundancy provided.

C.1

Required Action C.1 is intended to handle the inoperability of one RHRSW subsystem for reasons other than Condition A. The Completion Time of 7 days is allowed to restore the RHRSW subsystem to OPERABLE status. With the unit in this condition, the remaining OPERABLE RHRSW subsystem is adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure in the OPERABLE RHRSW subsystem could result in loss of RHRSW function. The Completion Time is based on the redundant RHRSW capabilities afforded by the OPERABLE subsystem and the low probability of an event occurring requiring RHRSW during this period.

(continued)

BASES

APPLICABILITY (continued)

In MODES 4 and 5, and defueled the OPERABILITY requirements of the PSW System and UHS are determined by the systems they support and therefore, the requirements are not the same for all facets of operation in MODES 4 and 5 and defueled. Thus, the LCOs of the individual systems, which require portions of the PSW System and the UHS to be OPERABLE, will govern PSW System and UHS requirements during operation in MODES 4 and 5 and defueled.

ACTIONS

A.1

With one PSW pump inoperable, the inoperable pump must be restored to OPERABLE status within 30 days. With the unit in this condition, the remaining OPERABLE PSW pumps (even allowing for an additional single failure) are adequate to perform the PSW heat removal function; however, the overall reliability is reduced. The 30 day Completion Time is based on the remaining PSW heat removal capability to accommodate additional single failures, and the low probability of an event occurring during this time period.

Required Action A.1 has been modified by a Note that indicates that the provisions of LCO 3.0.4 are not applicable. As a result, a MODE change is allowed when one PSW pump is inoperable. This allowance is provided because of the low probability of the occurrence of a LOCA and the redundancy of the remaining portions of the System.

B.1

With one PSW turbine building isolation valve inoperable, the inoperable valve must be restored to OPERABLE status within 30 days. With the unit in this condition, the remaining OPERABLE PSW turbine building isolation valve in the subsystem is adequate to isolate the non-essential loads, and, even allowing for an additional single failure, the other PSW subsystem is adequate to perform the PSW heat removal function; however, the overall reliability is reduced. The 30 day Completion Time is based on the remaining PSW heat removal capability to accommodate additional single failures, and the low probability of an event occurring during this time period.

Required Action B.1 has been modified by a Note that indicates that the provisions of LCO 3.0.4 are not applicable. As a result, a MODE change is allowed when one PSW turbine building isolation valve is inoperable. This allowance is provided because of the low

(continued)

BASES

ACTIONS

B.1 (continued)

probability of the occurrence of a LOCA and the redundancy of the remaining portions of the System.

C.1

With one PSW pump inoperable in each subsystem, one inoperable pump must be restored to OPERABLE status within 7 days. With the unit in this condition, the remaining OPERABLE PSW pumps are adequate to perform the PSW heat removal function; however, the overall reliability is reduced. The 7 day Completion Time is based on the remaining PSW heat removal capability to accommodate an additional single failure and the low probability of an event occurring during this time period.

Required Action C.1 has been modified by a Note that indicates that the provisions of LCO 3.0.4 are not applicable. As a result, a MODE change is allowed when one PSW pump in each subsystem is inoperable. This allowance is provided because of the low probability of the occurrence of a LOCA and the redundancy of the remaining portions of the System.

D.1

With one PSW turbine building isolation valve inoperable in each subsystem, one inoperable valve must be restored to OPERABLE status within 72 hours. With the unit in this condition, the remaining OPERABLE PSW valves are adequate to perform the PSW non-essential load isolation function; however, the overall reliability is reduced. The 72 hour Completion Time is based on the remaining PSW heat removal capability to accommodate an additional single failure and the low probability of an event occurring during this time period.

E.1

With one PSW subsystem inoperable for reasons other than Condition A and Condition B (e.g., inoperable flow path, both pumps inoperable in a loop, or both turbine building isolation valves inoperable in a loop), the PSW subsystem must be restored to OPERABLE status within 72 hours. With the unit in this condition, the remaining OPERABLE PSW subsystem is adequate to perform the

(continued)

BASES

LCO (continued)	<p>capabilities must be demonstrated to meet required Surveillances, e.g., capability of the DG to revert to standby status on an ECCS signal while operating in parallel test mode.</p> <p>Proper sequencing of loads, including tripping of nonessential loads, is a required function for DG OPERABILITY.</p> <p>The AC sources must be separate and independent (to the extent possible) (Ref. 1) of other AC sources. For the DGs, the separation and independence are complete. For the offsite AC sources, the separation and independence are to the extent practical. A circuit may be connected to more than one ESF bus, with automatic transfer capability to the other circuit OPERABLE, and not violate separation criteria. A circuit that is not connected to an ESF bus is required to have OPERABLE automatic transfer capability to at least two ESF buses (one of which must be to the 2F bus) to support OPERABILITY of that circuit.</p>
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APPLICABILITY	<p>The AC sources are required to be OPERABLE in MODES 1, 2, and 3 to ensure that:</p> <ol style="list-style-type: none">Acceptable fuel design limits and reactor coolant pressure boundary limits are not exceeded as a result of AOOs or abnormal transients; andAdequate core cooling is provided and containment OPERABILITY and other vital functions are maintained in the event of a postulated DBA.
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The AC power requirements for MODES 4 and 5 and other conditions in which AC Sources are required, are covered in LCO 3.8.2, "AC Sources - Shutdown."

ACTIONS	<p><u>A.1</u></p> <p>To ensure a highly reliable power source remains with one offsite circuit inoperable, it is necessary to verify the availability of the remaining required offsite circuits on a more frequent basis. Since the Required Action only specifies "perform," a failure of SR 3.8.1.1 acceptance criteria does not result in a Required Action not met. However, if a second required circuit fails SR 3.8.1.1, the second offsite circuit is inoperable, and Condition D, for two offsite circuits inoperable, is entered.</p>
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Insert B6

(continued)

Common Inserts for Technical Specifications Bases

INSERT B1

LCO 3.0.4 establishes limitations on changes in MODES or other specified conditions in the Applicability when an LCO is not met. It allows placing the unit in a MODE or other specified condition stated in that Applicability (e.g., the Applicability desired to be entered) when unit conditions are such that the requirements of the LCO would not be met, in accordance with LCO 3.0.4.a, LCO 3.0.4.b, or LCO 3.0.4.c.

LCO 3.0.4.a allows entry into a MODE or other specified condition in the Applicability with the LCO not met when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time. Compliance with Required Actions that permit continued operation of the unit for an unlimited period of time in a MODE or other specified condition provides an acceptable level of safety for continued operation. This is without regard to the status of the unit before or after the MODE change. Therefore, in such cases, entry into a MODE or other specified condition in the Applicability may be made in accordance with the provisions of the Required Actions.

LCO 3.0.4.b allows entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate.

The risk assessment may use quantitative, qualitative, or blended approaches, and the risk assessment will be conducted using the plant program, procedures, and criteria in place to implement 10 CFR 50.65(a)(4), which requires that risk impacts of maintenance activities be assessed and managed. The risk assessment, for the purposes of LCO 3.0.4.b, must take into account all inoperable Technical Specification equipment regardless of whether the equipment is included in the normal 10 CFR 50.65(a)(4) risk assessment scope. The risk assessments will be conducted using the procedures and guidance endorsed by Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." Regulatory Guide 1.182 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." These documents address general guidance for conduct of the risk assessment, quantitative and qualitative guidelines for establishing risk management actions, and example risk management actions. These include actions to plan and conduct other activities in a manner that controls overall risk, increased risk awareness by shift and management personnel, actions to reduce the duration of the condition, actions to minimize the magnitude of risk increases (establishment of backup success paths or compensatory measures), and determination that the proposed MODE change is acceptable. Consideration should also be given to the probability of completing restoration such that the requirements of the LCO would be met prior to the expiration of ACTIONS Completion Times that would require exiting the Applicability.

INSERT B1 (Continued)

LCO 3.0.4.b may be used with single, or multiple systems and components unavailable. NUMARC 93-01 provides guidance relative to consideration of simultaneous unavailability of multiple systems and components.

The results of the risk assessment shall be considered in determining the acceptability of entering the MODE or other specified condition in the Applicability, and any corresponding risk management actions. The LCO 3.0.4.b risk assessments do not have to be documented.

The Technical Specifications allow continued operation with equipment unavailable in MODE 1 for the duration of the Completion Time. Since this is allowable, and since in general the risk impact in that particular mode bounds the risk of transitioning into and through the applicable MODES or other specified conditions in the Applicability of the LCO, the use of the LCO 3.0.4.b allowance should be generally acceptable, as long as the risk is assessed and managed as stated above. However, there is a small subset of systems and components that have been determined to be more important to risk and use of the LCO 3.0.4.b is prohibited. The LCOs governing these system and components contain Notes prohibiting the use of LCO 3.0.4.b by stating that LCO 3.0.4.b is not applicable.

LCO 3.0.4.c allows entry into a MODE or other specified condition of the Applicability with the LCO not met based on a Note in the Specification which states LCO 3.0.4.c is applicable. These specific allowances permit entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered do not provide for continued operation for an unlimited period of time and a risk assessment has not been performed. This allowance may apply to all the ACTIONS or to a specific Required Action of a Specification. The risk assessments performed to justify the use of LCO 3.0.4.b usually only consider systems and components. For this reason, LCO 3.0.4.c is typically applied to Specifications which describe values and parameters (e.g., Drywell Air Temperature, Drywell Pressure, MCPR) and may be applied to other Specifications based on NRC plant-specific approval.

The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

The provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown. In this context, a unit shutdown is defined as a change in MODE or other specified condition in the Applicability associated with transitioning from MODE 1 to MODE 2, MODE 2 to MODE 3, and MODE 3 to MODE 4.

INSERT B1 (Continued)

Upon entry into a MODE or other specified condition in the Applicability with the LCO not met, LCO 3.0.1 and LCO 3.0.2 require entry into the applicable Conditions and Required Actions until the Condition is resolved, until the LCO is met, or until the unit is not within the Applicability of the Technical Specification.

Surveillances do not have to be performed on the associated inoperable equipment (or on variables outside the specified limits) as permitted by SR 3.0.1. Therefore, utilizing LCO 3.0.4 is not a violation of SR 3.0.1 or SR 3.0.4 for any Surveillances that have not been performed on inoperable equipment. However, SRs must be met to ensure OPERABILITY prior to declaring the associated equipment OPERABLE (or variable within limits) and restoring compliance with the affected LCO.

INSERT B2

SR 3.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified condition in the Applicability.

This Specification ensures that system and component OPERABILITY requirements and variable limits are met before entry into MODES or other specified conditions in the Applicability for which these systems and components ensure safe operation of the unit. The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

A provision is included to allow entry into a MODE or other specified condition in the Applicability when an LCO is not met due to a Surveillance not being met in accordance with LCO 3.0.4.

However, in certain circumstances, failing to meet an SR will not result in SR 3.0.4 restricting a MODE change or other specified condition change. When a system, subsystem, division, component, device, or variable is inoperable or outside its specified limits, the associated SR(s) are not required to be performed, per SR 3.0.1, which states that surveillances do not have to be performed on inoperable equipment. When equipment is inoperable, SR 3.0.4 does not apply to the associated SR(s) since the requirement for the SR(s) to be performed is removed. Therefore, failing to perform the Surveillance(s) within the specified Frequency does not result in an SR 3.0.4 restriction to changing MODES or other specified conditions of the Applicability. However, since the LCO is not met in this instance, LCO 3.0.4 will govern any restrictions that may (or may not) apply to MODE or other specified condition changes. SR 3.0.4 does not restrict changing MODES or other specified conditions of the Applicability when a Surveillance has not been performed within the specified Frequency, provided the requirement to declare the LCO not met has been delayed in accordance with SR 3.0.3.

The provisions of SR 3.0.4 shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of SR 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown. In this context, a unit shutdown is defined as a change in MODE or other specified condition in the Applicability associated with transitioning from MODE 1 to MODE 2, MODE 2 to MODE 3, and MODE 3 to MODE 4.

The precise requirements for performance of SRs are specified such that exceptions to SR 3.0.4 are not necessary. The specific time frames and conditions necessary for meeting the SRs are specified in the Frequency, in the Surveillance, or both. This allows performance of Surveillances when the prerequisite condition(s) specified in a Surveillance procedure require entry into the MODE or other specified condition in the Applicability of the associated LCO prior to the performance or completion of a

INSERT B2 (Continued)

Surveillance. A Surveillance that could not be performed until after entering the LCO's Applicability, would have its Frequency specified such that it is not "due" until the specific conditions needed are met. Alternately, the Surveillance may be stated in the form of a Note, as not required (to be met or performed) until a particular event, condition, or time has been reached. Further discussion of the specific formats of SRs' annotation is found in Section 1.4, Frequency.

INSERT B3

A Note permits the use of the provisions of LCO 3.0.4.c. This allowance permits entry into the applicable MODES(S) while relying on the ACTIONS.

INSERT B4

A Note prohibits the application of LCO 3.0.4.b to an inoperable HPCI subsystem. There is an increased risk associated with entering a MODE or other specified condition in the Applicability with an inoperable HPCI subsystem and the provisions of LCO 3.0.4.b, which allows entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, should not be applied in this circumstance.

INSERT B5

A Note prohibits the application of LCO 3.0.4.b to an inoperable RCIC subsystem. There is an increased risk associated with entering a MODE or other specified condition in the Applicability with an inoperable RCIC subsystem and the provisions of LCO 3.0.4.b, which allows entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, should not be applied in this circumstance.

INSERT B6

A Note prohibits the application of LCO 3.0.4.b to an inoperable DG. There is an increased risk associated with entering a MODE or other specified condition in the Applicability with an inoperable DG and the provisions of LCO 3.0.4.b, which allows entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, should not be applied in this circumstance.

Enclosure 3

Edwin I. Hatch Nuclear Plant
Request to Revise Technical Specifications Limiting Condition for Operation 3.0.4 and
Surveillance Requirement 3.0.4 using the Consolidated Line Item Improvement Process

Clean Typed Technical Specifications and Bases Pages

1.4 Frequency

-
- DESCRIPTION (continued)**
- a. The Surveillance is not required to be performed; and
 - b. The Surveillance is not required to be met or, even if required to be met, is not known to be failed.
-

EXAMPLES The following examples illustrate the various ways that Frequencies are specified. In these examples, the Applicability of the LCO (LCO not shown) is MODES 1, 2, and 3.

EXAMPLE 1.4-1

SURVEILLANCE REQUIREMENTS

<u>SURVEILLANCE</u>	<u>FREQUENCY</u>
Perform CHANNEL CHECK.	12 hours

Example 1.4-1 contains the type of SR most often encountered in the Technical Specifications (TS). The Frequency specifies an interval (12 hours) during which the associated Surveillance must be performed at least one time. Performance of the Surveillance initiates the subsequent interval. Although the Frequency is stated as 12 hours, an extension of the time interval to 1.25 times the interval specified in the Frequency is allowed by SR 3.0.2 for operational flexibility. The measurement of this interval continues at all times, even when the SR is not required to be met per SR 3.0.1 (such as when the equipment is inoperable, a variable is outside specified limits, or the unit is outside the Applicability of the LCO). If the interval specified by SR 3.0.2 is exceeded while the unit is in a MODE or other specified condition in the Applicability of the LCO, and the performance of the Surveillance is not otherwise modified (refer to Examples 1.4-3 and 1.4-4), then SR 3.0.3 becomes applicable.

If the interval as specified by SR 3.0.2 is exceeded while the unit is not in a MODE or other specified condition in the Applicability of the LCO for which performance of the SR is required, then SR 3.0.4 becomes applicable. The Surveillance must be performed within the Frequency requirements of SR 3.0.2, as modified by SR 3.0.3, prior to entry into the mode or other specified condition or the LCO is considered not met (in accordance with SR 3.0.1) and LCO 3.0.4 becomes applicable.

(continued)

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 3.0.1 LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2 and LCO 3.0.7.

LCO 3.0.2 Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6.

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.

LCO 3.0.3 When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:

- a. MODE 2 within 7 hours;
- b. MODE 3 within 13 hours; and
- c. MODE 4 within 37 hours.

Exceptions to this Specification are stated in the individual Specifications.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

LCO 3.0.3 is only applicable in MODES 1, 2, and 3.

LCO 3.0.4 When an LCO is not met, entry into a MODE or other specified Condition in the Applicability shall only be made:

- a. When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time,
- b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk

(continued)

3.0 LCO APPLICABILITY

- LCO 3.0.4 (continued) management actions, if appropriate; exceptions to this specification are stated in the individual Specifications, or
- c. When an allowance is stated in the individual value, parameter, or other Specification.
- This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.
-
- LCO 3.0.5 Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY, or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the required testing.
-
- LCO 3.0.6 When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, additional evaluations and limitations may be required in accordance with Specification 5.5.10, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.
- When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.
-
- LCO 3.0.7 Special Operations LCOs in Section 3.10 allow specified Technical Specifications (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Special Operations LCOs is optional. When a Special Operations LCO is desired to be met but is not met, the ACTIONS of the Special Operations LCO shall be met. When a Special Operations LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with the other applicable Specifications.

3.0 SR APPLICABILITY (continued)

SR 3.0.4

Entry into a MODE or other specified condition in the Applicability of an LCO shall only be made when the LCO's Surveillances have been met within their specified Frequency, except as provided by SR 3.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with LCO 3.0.4.

This provision shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

3.3 INSTRUMENTATION

3.3.3.1 Post Accident Monitoring (PAM) Instrumentation

LCO 3.3.3.1 The PAM instrumentation for each Function in Table 3.3.3.1-1 shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

-----**NOTE**-----

Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more Functions with one required channel inoperable.	A.1 Restore required channel to OPERABLE status.	30 days
B. Required Action and associated Completion Time of Condition A not met.	B.1 Initiate action in accordance with Specification 5.6.6.	Immediately
C. One or more Functions with two or more required channels inoperable.	C.1 Restore all but one required channel to OPERABLE status.	7 days
D. Required Action and associated Completion Time of Condition C not met.	D.1 Enter the Condition referenced in Table 3.3.3.1-1 for the channel.	Immediately
E. As required by Required Action D.1 and referenced in Table 3.3.3.1-1.	E.1 Be in MODE 3.	12 hours

(continued)

3.3 INSTRUMENTATION

3.3.3.2 Remote Shutdown System

LCO 3.3.3.2 The Remote Shutdown System Functions shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

-----NOTE-----

Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more required Functions inoperable.	A.1 Restore required Function to OPERABLE status.	30 days
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	12 hours

3.3 INSTRUMENTATION

3.3.6.3 Low-Low Set (LLS) Instrumentation

LCO 3.3.6.3 The LLS valve instrumentation for each Function in Table 3.3.6.3-1 shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One LLS valve with initiation capability not maintained.	A.1 Restore LLS valve initiation capability.	24 hours
B. One or more safety/relief valves (S/RVs) with one Function 3 channel inoperable.	B.1 Restore tailpipe pressure switches to OPERABLE status.	Prior to entering MODE 2 or 3 from MODE 4
C. -----NOTE----- Separate Condition entry is allowed for each S/RV. One or more S/RVs with two Function 3 channels inoperable.	C.1 Restore one tailpipe pressure switch to OPERABLE status.	14 days

(continued)

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.5 RCS Leakage Detection Instrumentation

LCO 3.4.5 The following RCS leakage detection instrumentation shall be OPERABLE:

- a. Drywell floor drain sump monitoring system; and
- b. One channel of either primary containment atmospheric particulate or atmospheric gaseous monitoring system.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Drywell floor drain sump monitoring system inoperable.	A.1 Restore drywell floor drain sump monitoring system to OPERABLE status.	30 days
B. Required primary containment atmospheric monitoring system inoperable.	B.1 Analyze grab samples of primary containment atmosphere. <u>AND</u> B.2 Restore required primary containment atmospheric monitoring system to OPERABLE status.	Once per 12 hours 30 days

(continued)

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.6 RCS Specific Activity

LCO 3.4.6 The specific activity of the reactor coolant shall be limited to DOSE EQUIVALENT I-131 specific activity $\leq 0.2 \mu\text{Ci/gm}$.

APPLICABILITY: MODE 1,
MODES 2 and 3 with any main steam line not isolated.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Reactor coolant specific activity $> 0.2 \mu\text{Ci/gm}$ and $\leq 4.0 \mu\text{Ci/gm}$ DOSE EQUIVALENT I-131.	<p>-----NOTE----- LCO 3.0.4.c is applicable.</p> <p>A.1 Determine DOSE EQUIVALENT I-131. <u>AND</u> A.2 Restore DOSE EQUIVALENT I-131 to within limits.</p>	<p>Once per 4 hours</p> <p>48 hours</p>
B. Required Action and associated Completion Time of Condition A not met. <u>OR</u> Reactor coolant specific activity $> 4.0 \mu\text{Ci/gm}$ DOSE EQUIVALENT I-131.	<p>B.1 Determine DOSE EQUIVALENT I-131. <u>AND</u> B.2.1 Isolate all main steam lines. <u>OR</u> B.2.2.1 Be in MODE 3. <u>AND</u> B.2.2.2 Be in MODE 4.</p>	<p>Once per 4 hours</p> <p>12 hours</p> <p>12 hours</p> <p>36 hours</p>

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.7 Residual Heat Removal (RHR) Shutdown Cooling System - Hot Shutdown

LCO 3.4.7 Two RHR shutdown cooling subsystems shall be OPERABLE and, with no recirculation pump in operation, at least one RHR shutdown cooling subsystem shall be in operation.

NOTES

1. Both RHR shutdown cooling subsystems and recirculation pumps may be removed from operation for up to 2 hours per 8 hour period.
2. One RHR shutdown cooling subsystem may be inoperable for up to 2 hours for performance of Surveillances.

APPLICABILITY: MODE 3 with reactor steam dome pressure less than the RHR low pressure permissive pressure.

ACTIONS

NOTE

Separate Condition entry is allowed for each RHR shutdown cooling subsystem.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or two RHR shutdown cooling subsystems inoperable.	<p>A.1 Initiate action to restore RHR shutdown cooling subsystem(s) to OPERABLE status.</p> <p><u>AND</u></p>	Immediately (continued)

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS) AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

3.5.1 ECCS - Operating

LCO 3.5.1 Each ECCS injection/spray subsystem and the Automatic Depressurization System (ADS) function of six of seven safety/relief valves shall be OPERABLE.

APPLICABILITY: MODE 1,
 MODES 2 and 3, except high pressure coolant injection (HPCI) and ADS valves are not required to be OPERABLE with reactor steam dome pressure \leq 150 psig.

ACTIONS

-----NOTE-----

LCO 3.0.4.b is not applicable to HPCI.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One low pressure ECCS injection/spray subsystem inoperable.	A.1 Restore low pressure ECCS injection/spray subsystem to OPERABLE status.	7 days
B. Required Action and associated Completion Time of Condition A not met.	B.1 Be in MODE 3. <u>AND</u> B.2 Be in MODE 4.	12 hours 36 hours
C. HPCI System inoperable.	C.1 Verify by administrative means RCIC System is OPERABLE. <u>AND</u> C.2 Restore HPCI System to OPERABLE status.	1 hour 14 days

(continued)

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS) AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

3.5.3 RCIC System

LCO 3.5.3 The RCIC System shall be OPERABLE.

APPLICABILITY: MODE 1,
MODES 2 and 3 with reactor steam dome pressure > 150 psig.

ACTIONS

-----NOTE-----

LCO 3.0.4.b is not applicable to RCIC.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. RCIC System inoperable.	A.1 Verify by administrative means high pressure coolant injection (HPCI) System is OPERABLE. <u>AND</u> A.2 Restore RCIC System to OPERABLE status.	1 hour 14 days
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3. <u>AND</u> B.2 Reduce reactor steam dome pressure to ≤ 150 psig.	12 hours 36 hours

3.6 CONTAINMENT SYSTEMS

3.6.3.1 Containment Atmosphere Dilution (CAD) System

LCO 3.6.3.1 Two CAD subsystems shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One CAD subsystem inoperable.	A.1 Restore CAD subsystem to OPERABLE status.	30 days
B. Two CAD subsystems inoperable.	B.1 Verify by administrative means that the hydrogen control function is maintained. <u>AND</u> B.2 Restore one CAD subsystem to OPERABLE status.	1 hour <u>AND</u> Once per 12 hours thereafter 7 days
C. Required Action and associated Completion Time not met.	C.1 Be in MODE 3.	12 hours

3.7 PLANT SYSTEMS

3.7.1 Residual Heat Removal Service Water (RHRSW) System

LCO 3.7.1 Two RHRSW subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One RHRSW pump inoperable.	A.1 Restore RHRSW pump to OPERABLE status.	30 days
B. One RHRSW pump in each subsystem inoperable.	B.1 Restore one RHRSW pump to OPERABLE status.	7 days
C. One RHRSW subsystem inoperable for reasons other than Condition A.	<p>-----NOTE----- Enter applicable Conditions and Required Actions of LCO 3.4.7, "Residual Heat Removal (RHR) Shutdown Cooling System - Hot Shutdown," for RHR shutdown cooling made inoperable by RHRSW System.</p> <p>-----</p> <p>C.1 Restore RHRSW subsystem to OPERABLE status.</p>	7 days

(continued)

3.7 PLANT SYSTEMS

3.7.2 Plant Service Water (PSW) System and Ultimate Heat Sink (UHS)

LCO 3.7.2 Two PSW subsystems and UHS shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One PSW pump inoperable.	A.1 Restore PSW pump to OPERABLE status.	30 days
B. One PSW turbine building isolation valve inoperable.	B.1 Restore PSW turbine building isolation valve to OPERABLE status.	30 days
C. One PSW pump in each subsystem inoperable.	C.1 Restore one PSW pump to OPERABLE status.	7 days
D. One PSW turbine building isolation valve in each subsystem inoperable.	D.1 Restore one PSW turbine building isolation valve to OPERABLE status.	72 hours

(continued)

3.7 PLANT SYSTEMS

3.7.3 Diesel Generator (DG) 1B Standby Service Water (SSW) System

LCO 3.7.3 The DG 1B SSW System shall be OPERABLE.

APPLICABILITY: When DG 1B is required to be OPERABLE.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. DG 1B SSW System inoperable.	<p>A.1 Align cooling water to DG 1B from a Unit 1 plant service water (PSW) subsystem.</p> <p><u>AND</u></p> <p>A.2 Verify cooling water is aligned to DG 1B from a Unit 1 PSW subsystem.</p> <p><u>AND</u></p> <p>A.3 Restore DG 1B SSW System to OPERABLE status.</p>	<p>8 hours</p> <p>Once per 31 days</p> <p>60 days</p>
B. Required Action and Associated Completion Time not met.	B.1 Declare DG 1B inoperable.	Immediately

ACTIONS

NOTE

LCO 3.0.4.b is not applicable to DGs.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One required offsite circuit inoperable.	<p>A.1 Perform SR 3.8.1.1 for OPERABLE required offsite circuits.</p> <p><u>AND</u></p> <p>A.2 Declare required feature(s) with no offsite power available inoperable when the redundant required feature(s) are inoperable.</p> <p><u>AND</u></p> <p>A.3 Restore required offsite circuit to OPERABLE status.</p>	<p>1 hour</p> <p><u>AND</u></p> <p>Once per 8 hours thereafter</p> <p>24 hours from discovery of no offsite power to one 4160 V ESF bus concurrent with inoperability of redundant required feature(s)</p> <p>72 hours</p> <p><u>AND</u></p> <p>17 days from discovery of failure to meet LCO 3.8.1.a, b, or c</p>
B. One Unit 1 or the swing DG inoperable.	<p>B.1 Perform SR 3.8.1.1 for OPERABLE required offsite circuit(s).</p> <p><u>AND</u></p>	<p>1 hour</p> <p><u>AND</u></p> <p>Once per 8 hours thereafter</p>

(continued)

1.4 Frequency

-
- | | |
|----------------------------|--|
| DESCRIPTION
(continued) | a. The Surveillance is not required to be performed; and
b. The Surveillance is not required to be met or, even if required to be met, is not known to be failed. |
|----------------------------|--|
-

EXAMPLES The following examples illustrate the various ways that Frequencies are specified. In these examples, the Applicability of the LCO (LCO not shown) is MODES 1, 2, and 3.

EXAMPLE 1.4-1

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
Perform CHANNEL CHECK.	12 hours

Example 1.4-1 contains the type of SR most often encountered in the Technical Specifications (TS). The Frequency specifies an interval (12 hours) during which the associated Surveillance must be performed at least one time. Performance of the Surveillance initiates the subsequent interval. Although the Frequency is stated as 12 hours, an extension of the time interval to 1.25 times the interval specified in the Frequency is allowed by SR 3.0.2 for operational flexibility. The measurement of this interval continues at all times, even when the SR is not required to be met per SR 3.0.1 (such as when the equipment is inoperable, a variable is outside specified limits, or the unit is outside the Applicability of the LCO). If the interval specified by SR 3.0.2 is exceeded while the unit is in a MODE or other specified condition in the Applicability of the LCO, and the performance of the Surveillance is not otherwise modified (refer to Examples 1.4-3 and 1.4-4), then SR 3.0.3 becomes applicable.

If the interval as specified by SR 3.0.2 is exceeded while the unit is not in a MODE or other specified condition in the Applicability of the LCO for which performance of the SR is required, then SR 3.0.4 becomes applicable. The surveillance must be performed within the Frequency requirements of SR 3.0.2, as modified by SR 3.0.3, prior to entry into the mode or other specified condition or the LCO is considered not met (in accordance with SR 3.0.1) and LCO 3.0.4 becomes applicable.

(continued)

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 3.0.1 LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2 and LCO 3.0.7.

LCO 3.0.2 Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6.

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.

LCO 3.0.3 When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:

- a. MODE 2 within 7 hours;
- b. MODE 3 within 13 hours; and
- c. MODE 4 within 37 hours.

Exceptions to this Specification are stated in the individual Specifications.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

LCO 3.0.3 is only applicable in MODES 1, 2, and 3.

LCO 3.0.4 When an LCO is not met, entry into a mode or other specified condition in the Applicability shall only be made:

- a. When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time,
- b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk

(continued)

3.0 LCO APPLICABILITY

- LCO 3.0.4
(continued) management actions, if appropriate; exceptions to this specification are stated in the individual Specifications, or
- c. When an allowance is stated in the individual value, parameter, or other Specification.

This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

- LCO 3.0.5 Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY, or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the required testing.
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- LCO 3.0.6 When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, additional evaluations and limitations may be required in accordance with Specification 5.5.10, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.
- When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.
-

- LCO 3.0.7 Special Operations LCOs in Section 3.10 allow specified Technical Specifications (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Special Operations LCOs is optional. When a Special Operations LCO is desired to be met but is not met, the ACTIONS of the Special Operations LCO shall be met. When a Special Operations LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with the other applicable Specifications.
-

3.0 SR APPLICABILITY (continued)

SR 3.0.4 Entry into a MODE or other specified condition in the Applicability of an LCO shall only be made when the LCO's Surveillances have been met within their specified Frequency, except as provided by SR 3.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with LCO 3.0.4.

This provision shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

3.3 INSTRUMENTATION

3.3.3.1 Post Accident Monitoring (PAM) Instrumentation

LCO 3.3.3.1 The PAM instrumentation for each Function in Table 3.3.3.1-1 shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

NOTE

Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more Functions with one required channel inoperable.	A.1 Restore required channel to OPERABLE status.	30 days
B. Required Action and associated Completion Time of Condition A not met.	B.1 Initiate action in accordance with Specification 5.6.6.	Immediately
C. One or more Functions with two or more required channels inoperable.	C.1 Restore all but one required channel to OPERABLE status.	7 days
D. Required Action and associated Completion Time of Condition C not met.	D.1 Enter the Condition referenced in Table 3.3.3.1-1 for the channel.	Immediately
E. As required by Required Action D.1 and referenced in Table 3.3.3.1-1.	E.1 Be in MODE 3.	12 hours

(continued)

3.3 INSTRUMENTATION

3.3.3.2 Remote Shutdown System

LCO 3.3.3.2 The Remote Shutdown System Functions shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

-----NOTE-----

Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more required Functions inoperable.	A.1 Restore required Function to OPERABLE status.	30 days
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	12 hours

3.3 INSTRUMENTATION

3.3.6.3 Low-Low Set (LLS) Instrumentation

LCO 3.3.6.3 The LLS valve instrumentation for each Function in Table 3.3.6.3-1 shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One LLS valve with initiation capability not maintained.	A.1 Restore LLS valve initiation capability.	24 hours
B. One or more safety/relief valves (S/RVs) with one Function 3 channel inoperable.	B.1 Restore tailpipe pressure switches to OPERABLE status.	Prior to entering MODE 2 or 3 from MODE 4
C. -----NOTE----- Separate Condition entry is allowed for each S/RV. One or more S/RVs with two Function 3 channels inoperable.	C.1 Restore one tailpipe pressure switch to OPERABLE status.	14 days

(continued)

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.5 RCS Leakage Detection Instrumentation

LCO 3.4.5 The following RCS leakage detection instrumentation shall be OPERABLE:

- a. Drywell floor drain sump monitoring system; and
- b. One channel of either primary containment atmospheric particulate or atmospheric gaseous monitoring system.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Drywell floor drain sump monitoring system inoperable.	A.1 Restore drywell floor drain sump monitoring system to OPERABLE status.	30 days
B. Required primary containment atmospheric monitoring system inoperable.	<p>B.1 Analyze grab samples of primary containment atmosphere.</p> <p><u>AND</u></p> <p>B.2 Restore required primary containment atmospheric monitoring system to OPERABLE status.</p>	<p>Once per 12 hours</p> <p>30 days</p>

(continued)

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.6 RCS Specific Activity

LCO 3.4.6 The specific activity of the reactor coolant shall be limited to DOSE EQUIVALENT I-131 specific activity $\leq 0.2 \mu\text{Ci/gm}$.

APPLICABILITY: MODE 1,
MODES 2 and 3 with any main steam line not isolated.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Reactor coolant specific activity $> 0.2 \mu\text{Ci/gm}$ and $\leq 4.0 \mu\text{Ci/gm}$ DOSE EQUIVALENT I-131.	<p>-----NOTE----- LCO 3.0.4.c is applicable. -----</p> <p>A.1 Determine DOSE EQUIVALENT I-131. <u>AND</u> A.2 Restore DOSE EQUIVALENT I-131 to within limits.</p>	<p>Once per 4 hours</p> <p>48 hours</p>
B. Required Action and associated Completion Time of Condition A not met. <u>OR</u> Reactor coolant specific activity $> 4.0 \mu\text{Ci/gm}$ DOSE EQUIVALENT I-131.	<p>B.1 Determine DOSE EQUIVALENT I-131. <u>AND</u> B.2.1 Isolate all main steam lines. <u>OR</u> B.2.2.1 Be in MODE 3. <u>AND</u> B.2.2.2 Be in MODE 4.</p>	<p>Once per 4 hours</p> <p>12 hours</p> <p>12 hours</p> <p>36 hours</p>

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.7 Residual Heat Removal (RHR) Shutdown Cooling System - Hot Shutdown

LCO 3.4.7 Two RHR shutdown cooling subsystems shall be OPERABLE and, with no recirculation pump in operation, at least one RHR shutdown cooling subsystem shall be in operation.

-NOTES-

1. Both RHR shutdown cooling subsystems and recirculation pumps may be removed from operation for up to 2 hours per 8 hour period.
 2. One RHR shutdown cooling subsystem may be inoperable for up to 2 hours for performance of Surveillances.

APPLICABILITY: MODE 3 with reactor steam dome pressure less than the RHR low pressure permissive pressure.

ACTIONS

-NOTE-

Separate Condition entry is allowed for each RHR shutdown cooling subsystem.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or two RHR shutdown cooling subsystems inoperable.	<p>A.1 Initiate action to restore RHR shutdown cooling subsystem(s) to OPERABLE status.</p> <p><u>AND</u></p>	Immediately

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS) AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

3.5.1 ECCS - Operating

LCO 3.5.1 Each ECCS injection/spray subsystem and the Automatic Depressurization System (ADS) function of six of seven safety/relief valves shall be OPERABLE.

APPLICABILITY: MODE 1,
 MODES 2 and 3, except high pressure coolant injection (HPCI) and ADS valves are not required to be OPERABLE with reactor steam dome pressure ≤ 150 psig.

ACTIONS

-----NOTE-----

LCO 3.0.4.b is not applicable to HPCI.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One low pressure ECCS injection/spray subsystem inoperable.	A.1 Restore low pressure ECCS injection/spray subsystem to OPERABLE status.	7 days
B. Required Action and associated Completion Time of Condition A not met.	B.1 Be in MODE 3. <u>AND</u> B.2 Be in MODE 4.	12 hours 36 hours
C. HPCI System inoperable.	C.1 Verify by administrative means RCIC System is OPERABLE. <u>AND</u> C.2 Restore HPCI System to OPERABLE status.	1 hour 14 days

(continued)

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS) AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

3.5.3 RCIC System

LCO 3.5.3 The RCIC System shall be OPERABLE.

APPLICABILITY: MODE 1,
 MODES 2 and 3 with reactor steam dome pressure > 150 psig.

ACTIONS

-----NOTE-----

LCO 3.0.4.b is not applicable to RCIC.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. RCIC System inoperable.	A.1 Verify by administrative means high pressure coolant injection (HPCI) System is OPERABLE. <u>AND</u> A.2 Restore RCIC System to OPERABLE status.	1 hour 14 days
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3. <u>AND</u> B.2 Reduce reactor steam dome pressure to ≤ 150 psig.	12 hours 36 hours

3.6 CONTAINMENT SYSTEMS

3.6.3.3 Drywell Cooling System Fans

LCO 3.6.3.3 Two drywell cooling system fans shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One required drywell cooling system fan inoperable.	A.1 Restore required drywell cooling system fan to OPERABLE status.	30 days
B. Two required drywell cooling system fans inoperable.	B.1 Restore one required drywell cooling system fan to OPERABLE status.	7 days
C. Required Action and Associated Completion Time not met.	C.1 Be in MODE 3.	12 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.6.3.3.1 Operate each required drywell cooling system fan for \geq 15 minutes.	92 days

3.7 PLANT SYSTEMS

3.7.1 Residual Heat Removal Service Water (RHRSW) System

LCO 3.7.1 Two RHRSW subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One RHRSW pump inoperable.	A.1 Restore RHRSW pump to OPERABLE status.	30 days
B. One RHRSW pump in each subsystem inoperable.	B.1 Restore one RHRSW pump to OPERABLE status.	7 days
C. One RHRSW subsystem inoperable for reasons other than Condition A.	<p>-----NOTE-----</p> <p>Enter applicable Conditions and Required Actions of LCO 3.4.7, "Residual Heat Removal (RHR) Shutdown Cooling System - Hot Shutdown," for RHR shutdown cooling made inoperable by RHRSW System.</p> <p>-----</p> <p>C.1 Restore RHRSW subsystem to OPERABLE status.</p>	7 days

(continued)

3.7 PLANT SYSTEMS

3.7.2 Plant Service Water (PSW) System and Ultimate Heat Sink (UHS)

LCO 3.7.2 Two PSW subsystems and UHS shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One PSW pump inoperable.	A.1 Restore PSW pump to OPERABLE status.	30 days
B. One PSW turbine building isolation valve inoperable.	B.1 Restore PSW turbine building isolation valve to OPERABLE status.	30 days
C. One PSW pump in each subsystem inoperable.	C.1 Restore one PSW pump to OPERABLE status.	7 days
D. One PSW turbine building isolation valve in each subsystem inoperable.	D.1 Restore one PSW turbine building isolation valve to OPERABLE status.	72 hours

(continued)

3.7 PLANT SYSTEMS

3.7.3 Diesel Generator (DG) 1B Standby Service Water (SSW) System

LCO 3.7.3 The DG 1B SSW System shall be OPERABLE.

APPLICABILITY: When DG 1B is required to be OPERABLE.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. DG 1B SSW System inoperable.	<p>A.1 Align cooling water to DG 1B from a Unit 1 plant service water (PSW) subsystem.</p> <p><u>AND</u></p> <p>A.2 Verify cooling water is aligned to DG 1B from a Unit 1 PSW subsystem.</p> <p><u>AND</u></p> <p>A.3 Restore DG 1B SSW System to OPERABLE status.</p>	<p>8 hours</p> <p>Once per 31 days</p> <p>60 days</p>
B. Required Action and Associated Completion Time not met.	B.1 Declare DG 1B inoperable.	Immediately

ACTIONS

NOTE

LCO 3.0.4.b is not applicable to DGs.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One required offsite circuit inoperable.	<p>A.1 Perform SR 3.8.1.1 for OPERABLE required offsite circuits.</p> <p><u>AND</u></p> <p>A.2 Declare required feature(s) with no offsite power available inoperable when the redundant required feature(s) are inoperable.</p> <p><u>AND</u></p> <p>A.3 Restore required offsite circuit to OPERABLE status.</p>	<p>1 hour</p> <p><u>AND</u></p> <p>Once per 8 hours thereafter</p> <p>24 hours from discovery of no offsite power to one 4160 V ESF bus concurrent with inoperability of redundant required feature(s)</p> <p>72 hours</p> <p><u>AND</u></p> <p>17 days from discovery of failure to meet LCO 3.8.1.a, b, or c</p>
B. One Unit 2 or the swing DG inoperable.	B.1 Perform SR 3.8.1.1 for OPERABLE required offsite circuit(s).	<p>1 hour</p> <p><u>AND</u></p> <p>Once per 8 hours thereafter</p> <p><u>AND</u></p>

(continued)

BASES (continued)

LCO 3.0.4	<p>LCO 3.0.4 establishes limitations on changes in MODES or other specified conditions in the Applicability when an LCO is not met. It allows placing the unit in a MODE or other specified condition stated in that Applicability (e.g., the Applicability desired to be entered) when unit conditions are such that the requirements of the LCO would not be met, in accordance with LCO 3.0.4.a, LCO 3.0.4.b, or LCO 3.0.4.c.</p> <p>LCO 3.0.4.a allows entry into a MODE or other specified condition in the Applicability with the LCO not met when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time. Compliance with Required Actions that permit continued operation of the unit for an unlimited period of time in a MODE or other specified condition provides an acceptable level of safety for continued operation. This is without regard to the status of the unit before or after the MODE change. Therefore, in such cases, entry into a MODE or other specified condition in the Applicability may be made in accordance with the provisions in the Required Actions.</p> <p>LCO 3.0.4.b allows entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate.</p> <p>The risk assessment may use quantitative, qualitative, or blended approaches, and the risk assessment will be conducted using the plant program, procedures, and criteria in place to implement 10 CFR 50.65(a)(4), which requires that risk impacts of maintenance activities be assessed and managed. The risk assessment, for the purposes of LCO 3.0.4.b, must take into account all inoperable Technical Specification equipment regardless of whether the equipment is included in the normal 10 CFR 50.65(a)(4) risk assessment scope. The risk assessments will be conducted using the procedures and guidance endorsed by Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." Regulatory Guide 1.182 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." These documents address general guidance for conduct of the risk assessment, quantitative and qualitative guidelines for establishing risk management actions, and example risk management actions. These include actions to plan and conduct other activities in a manner that controls overall risk, increased risk awareness by shift and management personnel, actions to reduce the duration of the</p>
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(continued)

BASES

LCO 3.0.4
(continued)

condition, actions to minimize the magnitude of risk increases (establishment of backup success paths or compensatory measures), and determination that the proposed MODE change is acceptable. Consideration should also be given to the probability of completing restoration such that the requirements of the LCO would be met prior to the expiration of ACTIONS Completion Times that would require exiting the Applicability.

LCO 3.0.4.b may be used with single or multiple systems and components unavailable. NUMARC 93-01 provides guidance relative to consideration of simultaneous unavailability of multiple systems and components.

The results of the risk assessment shall be considered in determining the acceptability of entering the MODE or other specified condition in the Applicability, and any corresponding risk management actions. The LCO 3.0.4.b risk assessments do not have to be documented.

The Technical Specifications allow continued operation with equipment unavailable in MODE 1 for the duration of the Completion Time. Since this is allowable, and since in general the risk impact in that particular mode bounds the risk of transitioning into and through the applicable MODES or other specified conditions in the Applicability of the LCO, the use of the LCO 3.0.4.b allowance should be generally acceptable, as long as the risk is assessed and managed as stated above. However, there is a small subset of systems and components that have been determined to be more important to risk, and use of the LCO 3.0.4.b is prohibited. The LCOs governing these systems and components contain Notes prohibiting the use of LCO 3.0.4.b by stating that LCO 3.0.4.b is not applicable.

LCO 3.0.4.c allows entry into a MODE or other specified condition of the Applicability with the LCO not met based on a Note in the Specification which states LCO 3.0.4.c is applicable. These specific allowances permit entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered do not provide for continued operation for an unlimited period of time and a risk assessment has not been performed. This allowance may apply to all the ACTIONS or to a specific Required Action of a Specification. The risk assessments performed to justify the use of LCO 3.0.4.b usually only consider systems and components. For this reason, LCO 3.0.4.c is typically applied to Specifications which describe values and parameters (e.g., Drywell Air Temperature, Drywell Pressure, MCPR) and may be applied to other Specifications based on NRC plant-specific approval.

(continued)

BASES

LCO 3.0.4
(continued)

The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

The provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown. In this context, a unit shutdown is defined as a change in MODE or other specified condition in the Applicability associated with transitioning from MODE 1 to MODE 2, MODE 2 to MODE 3, and MODE 3 to MODE 4.

Upon entry into a MODE or other specified condition in the Applicability with the LCO not met, LCO 3.0.1 and LCO 3.0.2 require entry into the applicable Conditions and Required Actions until the Condition is resolved, until the LCO is met, or until the unit is not within the Applicability of the Technical Specification.

Surveillances do not have to be performed on the associated inoperable equipment (or on variables outside the specified limits) as permitted by SR 3.0.1. Therefore, utilizing LCO 3.0.4 is not a violation of SR 3.0.1 or SR 3.0.4 for any Surveillances that have not been performed on inoperable equipment. However, SRs must be met to ensure OPERABILITY prior to declaring the associated equipment OPERABLE (or variable within limits) and restoring compliance with the affected LCO.

LCO 3.0.5

LCO 3.0.5 establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS. The sole purpose of this Specification is to provide an exception to LCO 3.0.2 [e.g., to not comply with the applicable Required Action(s)] to allow the performance of SRs to demonstrate:

- a. The OPERABILITY of the equipment being returned to service; or
- b. The OPERABILITY of other equipment.

The administrative controls ensure the time the equipment is returned to service in conflict with the requirements of the ACTIONS is limited to the time absolutely necessary to perform the allowed SRs. This Specification does not provide time to perform any other preventive or corrective maintenance.

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BASES

LCO 3.0.5 (continued)	<p>An example of demonstrating the OPERABILITY of the equipment being returned to service is reopening a containment isolation valve that has been closed to comply with Required Actions and must be reopened to perform the SRs.</p>
	<p>An example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of an SR on another channel in the other trip system. A similar example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to permit the logic to function and indicate the appropriate response during the performance of an SR on another channel in the same trip system.</p>
LCO 3.0.6	<p>LCO 3.0.6 establishes an exception to LCO 3.0.2 for support systems that have an LCO specified in the Technical Specifications (TS). This exception is provided because LCO 3.0.2 would require that the Conditions and Required Actions of the associated inoperable supported system LCO be entered solely due to the inoperability of the support system. This exception is justified because the actions that are required to ensure the plant is maintained in a safe condition are specified in the support system LCO's Required Actions. These Required Actions may include entering the supported system's Conditions and Required Actions or may specify other Required Actions.</p>

When a support system is inoperable and there is an LCO specified for it in the TS, the supported system(s) are required to be declared inoperable if determined to be inoperable as a result of the support system inoperability. However, it is not necessary to enter into the supported systems' Conditions and Required Actions unless directed to do so by the support system's Required Actions. The potential confusion and inconsistency of requirements related to the entry into multiple support and supported systems LCOs' Conditions and Required Actions are eliminated by providing all the actions that are necessary to ensure the plant is maintained in a safe condition in the support system's Required Actions.

However, there are instances where a support system's Required Action may either direct a supported system to be declared inoperable or direct entry into Conditions and Required Actions for the supported system. This may occur immediately or after some specified delay to perform some other Required Action. Regardless of whether it is immediate or after some delay, when a support system's Required Action directs a supported system to be declared inoperable or directs

(continued)

BASES

- LCO 3.0.6
(continued) entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.
- Specification 5.5.10, "Safety Function Determination Program (SFDP)," ensures loss of safety function is detected and appropriate actions are taken. Upon failure to meet two or more LCOs concurrently, an evaluation shall be made to determine if loss of safety function exists. Additionally, other limitations, remedial actions, or compensatory actions may be identified as a result of the support system inoperability and corresponding exception to entering supported system Conditions and Required Actions. The SFDP implements the requirements of LCO 3.0.6.
- Cross division checks to identify a loss of safety function for those support systems that support safety systems are required. The cross division check verifies that the supported systems of the redundant OPERABLE support system are OPERABLE, thereby ensuring safety function is retained. If this evaluation determines that a loss of safety function exists, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.
-
- LCO 3.0.7 There are certain special tests and operations required to be performed at various times over the life of the unit. These special tests and operations are necessary to demonstrate select unit performance characteristics, to perform special maintenance activities, and to perform special evolutions. Special Operations LCOs in Section 3.10 allow specified TS requirements to be changed to permit performances of these special tests and operations, which otherwise could not be performed if required to comply with the requirements of these TS. Unless otherwise specified, all the other TS requirements remain unchanged. This will ensure all appropriate requirements of the MODE or other specified condition not directly associated with or required to be changed to perform the special test or operation will remain in effect.
- The Applicability of a Special Operations LCO represents a condition not necessarily in compliance with the normal requirements of the TS. Compliance with Special Operations LCOs is optional. A special operation may be performed either under the provisions of the appropriate Special Operations LCO or under the other applicable TS requirements. If it is desired to perform the special operation under the provisions of the Special Operations LCO, the requirements of the

(continued)

BASES

LCO 3.0.7
(continued)

Special Operations LCO shall be followed. When a Special Operations LCO requires another LCO to be met, only the requirements of the LCO statement are required to be met regardless of that LCO's Applicability (i.e., should the requirements of this other LCO not be met, the ACTIONS of the Special Operations LCO apply, not the ACTIONS of the other LCO). However, there are instances where the Special Operations LCO's ACTIONS may direct the other LCO's ACTIONS be met. The Surveillances of the other LCO are not required to be met, unless specified in the Special Operations LCO. If conditions exist such that the Applicability of any other LCO is met, all the other LCO's requirements (ACTIONS and SRs) are required to be met concurrent with the requirements of the Special Operations LCO.

B 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

BASES

SRs SR 3.0.1 through SR 3.0.4 establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated.

SR 3.0.1 SR 3.0.1 establishes the requirement that SRs must be met during the MODES or other specified conditions in the Applicability for which the requirements of the LCO apply, unless otherwise specified in the individual SRs. This Specification is to ensure that Surveillances are performed to verify the OPERABILITY of systems and components, and that variables are within specified limits. Failure to meet a Surveillance within the specified Frequency, in accordance with SR 3.0.2, constitutes a failure to meet an LCO.

Systems and components are assumed to be OPERABLE when the associated SRs have been met. Nothing in this Specification, however, is to be construed as implying that systems or components are OPERABLE when:

- a. The systems or components are known to be inoperable, although still meeting the SRs; or
- b. The requirements of the Surveillance(s) are known to be not met between required Surveillance performances.

Surveillances do not have to be performed when the unit is in a MODE or other specified condition for which the requirements of the associated LCO are not applicable, unless otherwise specified. The SRs associated with a Special Operations LCO are only applicable when the Special Operations LCO is used as an allowable exception to the requirements of a Specification.

Surveillances, including Surveillances invoked by Required Actions, do not have to be performed on inoperable equipment because the ACTIONS define the remedial measures that apply. Surveillances have to be met and performed in accordance with SR 3.0.2, prior to returning equipment to OPERABLE status.

Upon completion of maintenance, appropriate post maintenance testing is required to declare equipment OPERABLE. This includes ensuring applicable Surveillances are not failed and their most recent performance is in accordance with SR 3.0.2. Post maintenance

(continued)

BASES

SR 3.0.1
(continued) testing may not be possible in the current MODE or other specified conditions in the Applicability due to the necessary unit parameters not having been established. In these situations, the equipment may be considered OPERABLE provided testing has been satisfactorily completed to the extent possible and the equipment is not otherwise believed to be incapable of performing its function. This will allow operation to proceed to a MODE or other specified condition where other necessary post maintenance tests can be completed.

Some examples of this process are:

- a. Control Rod Drive maintenance during refueling that requires scram testing at > 800 psi. However, if other appropriate testing is satisfactorily completed and the scram time testing of SR 3.1.4.3 is satisfied, the control rod can be considered OPERABLE. This allows startup to proceed to reach 800 psi to perform other necessary testing.
- b. High pressure coolant injection (HPCI) maintenance during shutdown that requires system functional tests at a specified pressure. Provided other appropriate testing is satisfactorily completed, startup can proceed with HPCI considered OPERABLE. This allows operation to reach the specified pressure to complete the necessary post maintenance testing.

SR 3.0.2 SR 3.0.2 establishes the requirements for meeting the specified Frequency for Surveillances and any Required Action with a Completion Time that requires the periodic performance of the Required Action on a "once per..." interval.

SR 3.0.2 permits a 25% extension of the interval specified in the Frequency. This extension facilitates Surveillance scheduling and considers plant operating conditions that may not be suitable for conducting the Surveillance (e.g., transient conditions or other ongoing Surveillance or maintenance activities).

The 25% extension does not significantly degrade the reliability that results from performing the Surveillance at its specified Frequency. This is based on the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the SRs. The exceptions to SR 3.0.2 are those Surveillances for which the 25% extension of the interval specified in the Frequency does not apply. These exceptions are stated in the individual Specifications. The requirements of regulations take

(continued)

BASES

SR 3.0.2
(continued) precedence over the TS. Therefore, when a test interval is specified in the regulations, the test interval cannot be extended by the TS, and the SR includes a Note in the Frequency stating, "SR 3.0.2 is not applicable." An example of an exception when the test interval is specified in the regulations is the Note in the Primary Containment Leakage Rate Testing Program, "SR 3.0.2 is not applicable." This exception is provided because the program already includes extension of test intervals.

As stated in SR 3.0.2, the 25% extension also does not apply to the initial portion of a periodic Completion Time that requires performance on a "once per..." basis. The 25% extension applies to each performance after the initial performance. The initial performance of the Required Action, whether it is a particular Surveillance or some other remedial action, is considered a single action with a single Completion Time. One reason for not allowing the 25% extension to this Completion Time is that such an action usually verifies that no loss of function has occurred by checking the status of redundant or diverse components or accomplishes the function of the inoperable equipment in an alternative manner.

The provisions of SR 3.0.2 are not intended to be used repeatedly, merely as an operational convenience to extend Surveillance intervals (other than those consistent with refueling intervals) or periodic Completion Time intervals beyond those specified.

SR 3.0.3

SR 3.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified Frequency, whichever is greater, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

This delay period provides adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with Required Actions or other remedial measures that might preclude completion of the Surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that

(continued)

BASES

SR 3.0.3 (continued) the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements.

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, SR 3.0.3 allows for the full delay period of up to the specified Frequency to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

SR 3.0.3 provides a time limit for, and allowances for the performance of, Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.

Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals. While up to 24 hours or the limit of the specified Frequency is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required or shutting the plant down to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance. This risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillances will be placed in the licensee's Corrective Action Program.

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BASES

SR 3.0.3
(continued) If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon the failure of the Surveillance.

Completion of the Surveillance within the delay period allowed by this Specification, or within the Completion Time of the ACTIONS, restores compliance with SR 3.0.1.

SR 3.0.4 SR 3.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified condition in the Applicability.

This Specification ensures that system and component OPERABILITY requirements and variable limits are met before entry into MODES or other specified conditions in the Applicability for which these systems and components ensure safe operation of the unit. The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

A provision is included to allow entry into a MODE or other specified condition in the Applicability when an LCO is not met due to a Surveillance not being met in accordance with LCO 3.0.4.

However, in certain circumstances, failing to meet an SR will not result in SR 3.0.4 restricting a MODE change or other specified condition change. When a system, subsystem, division, component, device, or variable is inoperable or outside its specified limits, the associated SR(s) are not required to be performed per SR 3.0.1, which states that surveillances do not have to be performed on inoperable equipment. When equipment is inoperable, SR 3.0.4 does not apply to the associated SR(s) since the requirement for the SR(s) to be performed is removed. Therefore, failing to perform the Surveillance(s) within the specified Frequency does not result in an SR 3.0.4 restriction to changing MODES or other specified conditions of the Applicability. However, since the LCO is not met in this

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BASES

SR 3.0.4 (continued)	<p>instance, LCO 3.0.4 will govern any restrictions that may (or may not) apply to MODE or other specified condition changes. SR 3.0.4 does not restrict changing MODES or other specified conditions of the applicability when a Surveillance has not been performed within the specified Frequency, provided the requirement to declare the LCO not met has been delayed in accordance with SR 3.0.3.</p> <p>The provisions of SR 3.0.4 shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of SR 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown. In this context, a unit shutdown is defined as a change in MODE or other specified condition in the Applicability associated with transitioning from MODE 1 to MODE 2, MODE 2 to MODE 3, and MODE 3 to MODE 4.</p> <p>The precise requirements for performance of SRs are specified such that exceptions to SR 3.0.4 are not necessary. The specific time frames and conditions necessary for meeting the SRs are specified in the Frequency, in the Surveillance, or both. This allows performance of Surveillances when the prerequisite condition(s) specified in a Surveillance procedure require entry into the MODE or other specified condition in the Applicability of the associated LCO prior to the performance or completion of a Surveillance. A Surveillance that could not be performed until after entering the LCO's Applicability would have its Frequency specified such that it is not "due" until the specific conditions needed are met. Alternately, the Surveillance may be stated in the form of a Note as not required (to be met or performed) until a particular event, condition, or time has been reached. Further discussion of the specific formats of SRs' annotation is found in Section 1.4, Frequency.</p>
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BASES

LCO (continued)	<p><u>12. RHR Service Water Flow</u></p> <p>RHR service water flow is a Type A variable provided to support the containment cooling function. The RHR Service Water flow signals are transmitted from separate flow transmitters (one per subsystem) and are continuously read on two control room indicators. These indicators are the primary indication used by the operator during an accident. Therefore, the PAM specification deals specifically with this portion of the instrument channel.</p>
APPLICABILITY	<p>The PAM instrumentation LCO is applicable in MODES 1 and 2. These variables are related to the diagnosis and preplanned actions required to mitigate DBAs. The applicable DBAs are assumed to occur in MODES 1 and 2. In MODES 3, 4, and 5, plant conditions are such that the likelihood of an event that would require PAM instrumentation is extremely low; therefore, PAM instrumentation is not required to be OPERABLE in these MODES.</p>
ACTIONS	<p>A Note has been provided to modify the ACTIONS related to PAM 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 PAM instrumentation channels provide appropriate compensatory measures for separate Functions. As such, a Note has been provided that allows separate Condition entry for each inoperable PAM Function.</p>

(continued)

BASES

APPLICABILITY (continued) This LCO is not applicable in MODES 3, 4, and 5. In these MODES, the plant is already subcritical and in a condition of reduced Reactor Coolant System energy. Under these conditions, considerable time is available to restore necessary instrument control Functions if control room instruments or control becomes unavailable. Consequently, the TS do not require OPERABILITY in MODES 3, 4, and 5.

ACTIONS A Note has been provided to modify the ACTIONS related to Remote Shutdown System Functions. 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 Remote Shutdown System Functions provide appropriate compensatory measures for separate Functions. As such, a Note has been provided that allows separate Condition entry for each inoperable Remote Shutdown System Function.

A.1

Condition A addresses the situation where one or more required Functions of the Remote Shutdown System is inoperable. This includes any Function listed in Reference 2, as well as the control and transfer switches.

The Required Action is to restore the Function to OPERABLE status within 30 days. The Completion Time is based on operating experience and the low probability of an event that would require evacuation of the control room.

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BASES

ACTIONS

A.1 (continued)

OPERABLE status (i.e., restore the LLS valve's initiation capability). If the inoperable channel(s) cannot be restored to OPERABLE status within the allowable out of service time, Condition D must be entered and its Required Action taken. The Required Actions do not allow placing the channel in trip since this action could result in an instrumented LLS valve actuation. The 24 hour Completion Time is considered appropriate because of the redundancy in the design (4 LLS valves are provided and any 1 LLS valve can perform the LLS function) and the very low probability of multiple LLS instrumentation channel failures, which render the remaining LLS S/RVs inoperable, occurring together with an event requiring the LLS function during the 24 hour Completion Time. The 24 hour Completion Time is also based on the reliability analysis of Reference 3.

B.1

Although the LLS circuitry is designed so that operation of a single tailpipe pressure switch will result in arming both LLS logics in its associated division, each tailpipe pressure switch provides a direct input to only one LLS logic (e.g., Logic A). Since each LLS logic normally receives at least five S/RV pressure switch inputs (and also receives the other S/RV signals from the other logic in the same division by an arming signal), the LLS logic and instrumentation remains capable of performing its safety function if any S/RV tailpipe pressure switch instrument channel becomes inoperable. Therefore, it is acceptable for plant operation to continue with only one tailpipe pressure switch OPERABLE on each S/RV. However, this is only acceptable provided each LLS valve is maintaining initiation capability. (Refer to Required Actions A.1 and D.1 Bases.)

Required Action B.1 requires restoration of the tailpipe pressure switches to OPERABLE status prior to entering MODE 2 or 3 from MODE 4 to ensure that all switches are OPERABLE at the beginning of a reactor startup (this is because the switches are not accessible during plant operation). The Required Actions do not allow placing the channel in trip since this action could result in a LLS valve actuation.

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BASES

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| ACTIONS | <u>A.1</u> (continued) |
| | 2) With an inoperable sump monitoring system integrator, the sump can be manually pumped down and the time for pumpdown recorded. Utilizing pump flow rate, total gallons pumped is determined. Using time elapsed since last pumpdown, sump inleakage rate can be calculated. |

B.1 and B.2

With both gaseous and particulate primary containment atmospheric monitoring channels inoperable (i.e., the required containment atmospheric monitoring system), grab samples of the primary containment atmosphere must be taken and an isotopic analysis performed to provide periodic leakage information. Provided a sample is obtained and analyzed once every 12 hours, the plant may be operated for up to 30 days to allow restoration of at least one of the required monitors.

The 12 hour interval provides periodic information that is adequate to detect LEAKAGE. The 30 day Completion Time for restoration recognizes that at least one other form of leakage detection is available.

C.1 and C.2

If any Required Action and associated Completion Time of Condition A or B cannot be met, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours and MODE 4 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to perform the actions in an orderly manner and without challenging plant systems.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued) site, such as the location of the site boundary and the meteorological conditions of the site.
RCS specific activity satisfies Criterion 2 of the NRC Policy Statement (Ref. 4).

LCO The specific iodine activity is limited to $\leq 0.2 \mu\text{Ci/gm}$ DOSE EQUIVALENT I-131. This limit ensures the source term assumed in the safety analysis for the MSLB is not exceeded, so any release of radioactivity to the environment during an MSLB is well within the 10 CFR 100 limits.

APPLICABILITY In MODE 1, and MODES 2 and 3 with any main steam line not isolated, limits on the primary coolant radioactivity are applicable since there is an escape path for release of radioactive material from the primary coolant to the environment in the event of an MSLB outside of primary containment.

In MODES 2 and 3 with the main steam lines isolated, such limits do not apply since an escape path does not exist. In MODES 4 and 5, no limits are required since the reactor is not pressurized and the potential for leakage is reduced.

ACTIONS A.1 and A.2

When the reactor coolant specific activity exceeds the LCO DOSE EQUIVALENT I-131 limit, but is $\leq 4.0 \mu\text{Ci/gm}$, samples must be analyzed for DOSE EQUIVALENT I-131 at least once every 4 hours. In addition, the specific activity must be restored to the LCO limit within 48 hours. The Completion Time of once every 4 hours is based on the time needed to take and analyze a sample. The 48 hour Completion Time to restore the activity level provides a reasonable time for temporary coolant activity increases (iodine spikes or crud bursts) to be cleaned up with the normal processing systems.

A Note permits the use of the provisions of LCO 3.0.4.c. This allowance permits entry into the applicable MODE(S) while relying on the ACTIONS. This allowance is acceptable due to the significant conservatism incorporated into the specific activity limit, the low

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BASES

ACTIONS	<u>A.1 and A.2 (continued)</u>
	probability of an event which is limiting due to exceeding this limit, and the ability to restore transient specific activity excursions while the plant remains at, or proceeds to power operation.
	<u>B.1, B.2.1, B.2.2.1, and B.2.2.2</u>
	If the DOSE EQUIVALENT I-131 cannot be restored to $\leq 0.2 \mu\text{Ci/gm}$ within 48 hours, or if at any time it is $> 4.0 \mu\text{Ci/gm}$, it must be determined at least once every 4 hours and all the main steam lines must be isolated within 12 hours. Isolating the main steam lines precludes the possibility of releasing radioactive material to the environment in an amount that is not well within the requirements of 10 CFR 100 during a postulated MSLB accident. Alternatively, the plant can be placed in MODE 3 within 12 hours and in MODE 4 within 36 hours. This option is provided for those instances when isolation of main steam lines is not desired (e.g., due to the decay heat loads). In MODE 4, the requirements of the LCO are no longer applicable.
	The Completion Time of once every 4 hours is the time needed to take and analyze a sample. The 12 hour Completion Time is reasonable, based on operating experience, to isolate the main steam lines in an orderly manner and without challenging plant systems. Also, the allowed Completion Times for Required Actions B.2.2.1 and B.2.2.2 for placing the unit in MODES 3 and 4 are reasonable, based on operating experience, to achieve the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.
	<u>SR 3.4.6.1</u>
	This Surveillance is performed to ensure iodine remains within limit during normal operation. The 7 day Frequency is adequate to trend changes in the iodine activity level.
	This SR is modified by a Note that requires this Surveillance to be performed only in MODE 1 because the level of fission products generated in other MODES is much less.

(continued)

BASES (continued)

ACTIONS	<p>A Note has been provided to modify the ACTIONS related to RHR shutdown cooling subsystems. Section 1.3, Completion Times, specifies 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 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 shutdown cooling subsystems provide appropriate compensatory measures for separate inoperable shutdown cooling subsystems. As such, a Note has been provided that allows separate Condition entry for each inoperable RHR shutdown cooling subsystem.</p>
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A.1, A.2, and A.3

With one required RHR shutdown cooling subsystem inoperable for decay heat removal, except as permitted by LCO Note 2, the inoperable subsystem must be restored to OPERABLE status without delay. In this condition, the remaining OPERABLE subsystem can provide the necessary decay heat removal. The overall reliability is reduced, however, because a single failure in the OPERABLE subsystem could result in reduced RHR shutdown cooling capability. Therefore, an alternate method of decay heat removal must be provided.

With both RHR shutdown cooling subsystems inoperable, an alternate method of decay heat removal must be provided in addition to that provided for the initial RHR shutdown cooling subsystem inoperability. This re-establishes backup decay heat removal capabilities, similar to the requirements of the LCO. The 1 hour Completion Time is based on the decay heat removal function and the probability of a loss of the available decay heat removal capabilities.

The required cooling capacity of the alternate method should be ensured by verifying (by calculation or demonstration) its capability to maintain or reduce temperature. Decay heat removal by ambient losses can be considered as, or contributing to, the alternate method capability. Alternate methods that can be used include (but are not limited to) the Condensate/Main Steam Systems and the Reactor Water Cleanup System.

(continued)

BASES

ACTIONS	<u>A.1, A.2, and A.3</u> (continued)
	However, due to the potentially reduced reliability of the alternate methods of decay heat removal, it is also required to reduce the reactor coolant temperature to the point where MODE 4 is entered.
	<u>B.1, B.2, and B.3</u>
	With no RHR shutdown cooling subsystem and no recirculation pump in operation, except as permitted by LCO Note 1, reactor coolant circulation by the RHR shutdown cooling subsystem or recirculation pump must be restored without delay.
	Until RHR or recirculation pump operation is re-established, an alternate method of reactor coolant circulation must be placed into service. This will provide the necessary circulation for monitoring coolant temperature. The 1 hour Completion Time is based on the coolant circulation function and is modified such that the 1 hour is applicable separately for each occurrence involving a loss of coolant circulation. Furthermore, verification of the functioning of the alternate method must be reconfirmed every 12 hours thereafter. This will provide assurance of continued temperature monitoring capability.
	During the period when the reactor coolant is being circulated by an alternate method (other than by the required RHR shutdown cooling subsystem or recirculation pump), the reactor coolant temperature and pressure must be periodically monitored to ensure proper function of the alternate method. The once per hour Completion Time is deemed appropriate.

SURVEILLANCE REQUIREMENTS	<u>SR 3.4.7.1</u>
	This Surveillance verifies that one RHR shutdown cooling subsystem or recirculation pump is in operation and circulating reactor coolant. The required flow rate is determined by the flow rate necessary to provide sufficient decay heat removal capability. The Frequency of 12 hours is sufficient in view of other visual and audible indications available to the operator for monitoring the RHR subsystem in the control room.

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BASES

**SURVEILLANCE
REQUIREMENTS**

SR 3.4.7.1 (continued)

This Surveillance is modified by a Note allowing sufficient time to align the RHR System for shutdown cooling operation after clearing the pressure interlock that isolates the system, or for placing a recirculation pump in operation. The Note takes exception to the requirements of the Surveillance being met (i.e., forced coolant circulation is not required for this initial 2 hour period), which also allows entry into the Applicability of this Specification in accordance with SR 3.0.4 since the Surveillance will not be "not met" at the time of entry into the Applicability.

REFERENCES

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

LCO
(continued) subsystems and ADS must therefore be OPERABLE to satisfy the single failure criterion required by Reference 10. (Reference 9 takes no credit for HPCI.) HPCI must be OPERABLE due to risk consideration.

LPCI subsystems may be considered OPERABLE during alignment and operation for decay heat removal when below the actual RHR low pressure permissive pressure in MODE 3, if capable of being manually realigned (remote or local) to the LPCI mode and not otherwise inoperable. At these low pressures and decay heat levels, a reduced complement of ECCS subsystems should provide the required core cooling, thereby allowing operation of RHR shutdown cooling when necessary.

APPLICABILITY All ECCS subsystems are required to be OPERABLE during MODES 1, 2, and 3, when there is considerable energy in the reactor core and core cooling would be required to prevent fuel damage in the event of a break in the primary system piping. In MODES 2 and 3, when reactor steam dome pressure is \leq 150 psig, ADS and HPCI are not required to be OPERABLE because the low pressure ECCS subsystems can provide sufficient flow below this pressure. ECCS requirements for MODES 4 and 5 are specified in LCO 3.5.2, "ECCS - Shutdown."

ACTIONS A Note prohibits the application of LCO 3.0.4.b to an inoperable HPCI subsystem. There is an increased risk associated with entering a MODE or other specified condition in the Applicability with an inoperable HPCI subsystem and the provisions of LCO 3.0.4.b, which allows entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, should not be applied in this circumstance.

A.1

If any one low pressure ECCS injection/spray subsystem is inoperable, the inoperable subsystem must be restored to OPERABLE status within 7 days. In this condition, the remaining OPERABLE subsystems provide adequate core cooling during a LOCA. However, overall ECCS reliability is reduced, because a single failure in one of the remaining OPERABLE subsystems, concurrent with a LOCA, may result in the ECCS not being able to perform its intended safety function. The 7 day Completion Time is

(continued)

BASES

ACTIONS

A.1 (continued)

based on a reliability study (Ref. 11) that evaluated the impact on ECCS availability, assuming various components and subsystems were taken out of service. The results were used to calculate the average availability of ECCS equipment needed to mitigate the consequences of a LOCA as a function of allowed outage times (i.e., Completion Times).

B.1 and B.2

If the inoperable low pressure ECCS subsystem cannot be restored to OPERABLE status within the associated Completion Time, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours and to MODE 4 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

C.1 and C.2

If the HPCI System is inoperable and the RCIC System is verified to be OPERABLE, the HPCI System must be restored to OPERABLE status within 14 days. In this condition, adequate core cooling is ensured by the OPERABILITY of the redundant and diverse low pressure ECCS injection/spray subsystems in conjunction with ADS. Also, the RCIC System will automatically provide makeup water at most reactor operating pressures. Verification of RCIC OPERABILITY within 1 hour is therefore required when HPCI is inoperable. This may be performed as an administrative check by examining logs or other information to determine if RCIC is out of service for maintenance or other reasons. It does not mean to perform the Surveillances needed to demonstrate the OPERABILITY of the RCIC System. If the OPERABILITY of the RCIC System cannot be verified, however, Condition E must be immediately entered. If a single active component fails concurrent with a design basis LOCA, there is a potential, depending on the specific failure, that the minimum required ECCS equipment will not be available. A 14 day Completion Time is based on a reliability study cited in Reference 11 and has been found to be acceptable through operating experience.

(continued)

BASES

ACTIONS	
	<u>D.1 and D.2</u>
	<p>If any one low pressure ECCS injection/spray subsystem is inoperable in addition to an inoperable HPCI System, the inoperable low pressure ECCS injection/spray subsystem or the HPCI System must be restored to OPERABLE status within 72 hours. In this condition, adequate core cooling is ensured by the OPERABILITY of the ADS and the remaining low pressure ECCS subsystems. However, the overall ECCS reliability is significantly reduced because a single failure in one of the remaining OPERABLE subsystems concurrent with a design basis LOCA may result in the ECCS not being able to perform its intended safety function. Since both a high pressure system (HPCI) and a low pressure subsystem are inoperable, a more restrictive Completion Time of 72 hours is required to restore either the HPCI System or the low pressure ECCS injection/spray subsystem to OPERABLE status. This Completion Time is based on a reliability study cited in Reference 11 and has been found to be acceptable through operating experience.</p>
	<u>E.1 and E.2</u>
	<p>With one ADS valve inoperable, no action is required, because an analysis demonstrated that the remaining six ADS valves are capable of providing the ADS function, per Reference 13.</p> <p>If any Required Action and associated Completion Time of Condition C or D is not met, or if two or more ADS valves are inoperable, the plant must be brought to a condition in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours and reactor steam dome pressure reduced to ≤ 150 psig within 36 hours. Entry into MODE 3 is not required if the reduction in reactor steam dome pressure to ≤ 150 psig results in exiting the Applicability for the Condition, and the ≤ 150 psig is achieved within the given 12 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.</p>
	<u>F.1</u>
	<p>When multiple ECCS subsystems are inoperable, as stated in Condition H, the plant is in a condition outside of the accident analyses. Therefore, LCO 3.0.3 must be entered immediately.</p>

(continued)

BASES (continued)

SURVEILLANCE
REQUIREMENTS

SR 3.5.1.1

The flow path piping has the potential to develop voids and pockets of entrained air. Maintaining the pump discharge lines of the HPCI System, CS System, and LPCI subsystems full of water ensures that the ECCS will perform properly, injecting its full capacity into the RCS upon demand. This will also prevent a water hammer following an ECCS initiation signal. One acceptable method of ensuring that the lines are full is to vent at the high points. In addition, when HPCI is aligned to the suppression pool (instead of the CST), one acceptable method is to monitor pump suction pressure. The 31 day Frequency is based on the gradual nature of void buildup in the ECCS piping, the procedural controls governing system operation, and operating experience.

SR 3.5.1.2

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 initiation signal is allowed to be in a nonaccident position provided the valve will automatically reposition in the proper stroke time. This SR does not require any testing or valve manipulation; rather, it involves verification that those valves capable of potentially being mispositioned are in the correct position. This SR does not apply to valves that cannot be inadvertently misaligned, such as check valves. For the HPCI System, this SR also includes the steam flow path for the turbine and the flow controller position.

The 31 day Frequency of this SR was derived from the Inservice Testing Program requirements for performing valve testing at least once every 92 days. The Frequency of 31 days is further justified because the valves are operated under procedural control and because improper valve position would only affect a single subsystem. This Frequency has been shown to be acceptable through operating experience.

This SR is modified by a Note that allows LPCI subsystems to be considered OPERABLE during alignment and operation for decay heat removal with reactor steam dome pressure less than the RHR low pressure permissive pressure in MODE 3, if capable of being

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.5.1.2 (continued)

manually realigned (remote or local) to the LPCI mode and not otherwise inoperable. This allows operation in the RHR shutdown cooling mode during MODE 3, if necessary.

SR 3.5.1.3

Verification every 31 days that ADS air supply header pressure is \geq 90 psig ensures adequate air pressure for reliable ADS operation. The accumulator on each ADS valve provides pneumatic pressure for valve actuation. The design pneumatic supply pressure requirements for the accumulator are such that, following a failure of the pneumatic supply to the accumulator, at least two valve actuations can occur with the drywell at 70% of design pressure (Ref. 11). The ECCS safety analysis assumes only one actuation to achieve the depressurization required for operation of the low pressure ECCS. This minimum required pressure of \geq 90 psig (for one actuation) is provided by the ADS instrument air supply. The 31 day Frequency takes into consideration administrative controls over operation of the air system and alarms for low air pressure.

SR 3.5.1.4

Verification every 31 days that the RHR System cross tie valve is closed and power to its operator is disconnected ensures that each LPCI subsystem remains independent and a failure of the flow path in one subsystem will not affect the flow path of the other LPCI subsystem. Acceptable methods of removing power to the operator include de-energizing breaker control power or racking out or removing the breaker. If the RHR System cross tie valve is open or power has not been removed from the valve operator, both LPCI subsystems must be considered inoperable. The 31 day Frequency has been found acceptable, considering that these valves are under strict administrative controls that will ensure the valves continue to remain closed with either control or motive power removed.

SR 3.5.1.5 (Not used.)

(continued)

BASES

SURVEILLANCE
REQUIREMENTS
(continued)

SR 3.5.1.6

Cycling the recirculation pump discharge valves through one complete cycle of full travel demonstrates that the valves are mechanically OPERABLE and will close when required. Upon initiation of an automatic LPCI subsystem injection signal, these valves are required to be closed to ensure full LPCI subsystem flow injection in the reactor via the recirculation jet pumps. De-energizing the valve in the closed position will also ensure the proper flow path for the LPCI subsystem.

Acceptable methods of de-energizing the valve include de-energizing breaker control power, racking out the breaker or removing the breaker.

The specified Frequency is once per 31 days. However, this SR is modified by a Note that states the Surveillance is only required to be performed prior to entering MODE 2 from MODE 3 or 4, when in MODE 4 > 48 hours. Verification during or following MODE 4 > 48 hours and prior to entering MODE 2 from MODE 3 or 4 is an exception to the normal Inservice Testing Program generic valve cycling Frequency of 92 days, but is considered acceptable due to the demonstrated reliability of these valves. The 48 hours is intended to indicate an outage of sufficient duration to allow for scheduling and proper performance of the Surveillance. If the valve is inoperable and in the open position, the associated LPCI subsystem must be declared inoperable.

SR 3.5.1.7, SR 3.5.1.8, and SR 3.5.1.9

The performance requirements of the low pressure ECCS pumps are determined through application of the 10 CFR 50, Appendix K criteria (Ref. 7). This periodic Surveillance is performed (in accordance with the ASME Code, Section XI, requirements for the ECCS pumps) to verify that the ECCS pumps will develop the flow rates required by the respective analyses. The low pressure ECCS pump flow rates ensure that adequate core cooling is provided to satisfy the acceptance criteria of Reference 9. The pump flow rates are verified against a system head equivalent to the RPV pressure expected during a LOCA. The total system pump outlet pressure is adequate to overcome the elevation head pressure between the pump suction and the vessel discharge, the piping friction losses, and RPV pressure present during a LOCA. These values may be established during preoperational testing.

The flow tests for the HPCI System are performed at two different pressure ranges such that system capability to provide rated flow is

(continued)

BASES

**SURVEILLANCE
REQUIREMENTS**

SR 3.5.1.7, SR 3.5.1.8, and SR 3.5.1.9 (continued)

tested at both the higher and lower operating ranges of the system. The pump flow rates are verified against a system head corresponding to the RPV pressure. The total system pump outlet pressure is adequate to overcome the elevation head pressure between the pump suction and the vessel discharge, the piping friction losses, and RPV pressure. Additionally, adequate steam flow must be passing through the main turbine or turbine bypass valves to continue to control reactor pressure when the HPCI System diverts steam flow. The reactor steam pressure must be ≥ 920 psig to perform SR 3.5.1.8 and ≥ 150 psig to perform SR 3.5.1.9. Adequate steam flow for SR 3.5.1.8 is represented by at least two turbine bypass valves open, or ≥ 200 MWE from the main turbine generator; and for SR 3.5.1.9 adequate steam flow is represented by at least 1.25 turbine bypass valves open, or total steam flow $\geq 1E6$ lb/hour. Therefore, sufficient time is allowed after adequate pressure and flow are achieved to perform these tests. Reactor startup is allowed prior to performing the low pressure Surveillance test because the reactor pressure is low and the time allowed to satisfactorily perform the Surveillance test is short. The reactor pressure is allowed to be increased to normal operating pressure since it is assumed that the low pressure test has been satisfactorily completed and there is no indication or reason to believe that HPCI is inoperable. Therefore, SR 3.5.1.8 and SR 3.5.1.9 are modified by Notes that state the Surveillances are not required to be performed until 12 hours after the reactor steam pressure and flow are adequate to perform the test. The 12 hours allowed is sufficient to achieve stable conditions for testing and provides a reasonable time to complete the SR.

The Frequency for SR 3.5.1.7 and SR 3.5.1.8 is consistent with the Inservice Testing Program pump testing requirements. The 24 month Frequency for SR 3.5.1.9 is based on the need to perform the Surveillance under the conditions that apply just prior to or during a startup from a plant outage. The 24 month Frequency of SR 3.5.1.9 is based on a review of the surveillance test history and Reference 15.

SR 3.5.1.10

The ECCS subsystems are required to actuate automatically to perform their design functions. This Surveillance verifies that, with a required system initiation signal (actual or simulated), the automatic initiation logic of HPCI, CS, and LPCI will cause the systems or subsystems to operate as designed, including actuation of the system

(continued)

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.5.1.10 (continued)

throughout its emergency operating sequence, automatic pump startup and actuation of all automatic valves to their required positions. This SR also ensures that the HPCI System will automatically restart on an RPV low water level (Level 2) signal received subsequent to an RPV high water level (Level 8) trip and that the suction is automatically transferred from the CST to the suppression pool. The LOGIC SYSTEM FUNCTIONAL TEST performed in LCO 3.3.5.1 overlaps this Surveillance to provide complete testing of the assumed safety function.

The 24 month Frequency is based on the need to perform the 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. The 24 month Frequency is based on a review of the surveillance test history and Reference 15.

This SR is modified by a Note that excludes vessel injection/spray during the Surveillance. Since all active components are testable and full flow can be demonstrated by recirculation through the test line, coolant injection into the RPV is not required during the Surveillance.

SR 3.5.1.11

The ADS designated S/RVs are required to actuate automatically upon receipt of specific initiation signals. A system functional test is performed to demonstrate that the mechanical portions of the ADS function (i.e., solenoids) operate as designed when initiated either by an actual or simulated initiation signal, causing proper actuation of all the required components. SR 3.5.1.12 and the LOGIC SYSTEM FUNCTIONAL TEST performed in LCO 3.3.5.1 overlap this Surveillance to provide complete testing of the assumed safety function.

The 24 month Frequency is based on the need to perform the 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. The 24 month Frequency is based on a review of the surveillance test history and Reference 15.

This SR is modified by a Note that excludes valve actuation. This prevents an RPV pressure blowdown.

(continued)

BASES

BACKGROUND (continued)	when other discharge line valves are closed. To ensure rapid delivery of water to the RPV and to minimize water hammer effects, the RCIC System discharge piping is kept full of water. The RCIC System is normally aligned to the CST. The height of water in the CST is sufficient to maintain the piping full of water up to the first isolation valve. The relative height of the feedwater line connection for RCIC is such that the water in the feedwater lines keeps the remaining portion of the RCIC discharge line full of water. Therefore, RCIC does not require a "keep fill" system.
APPLICABLE SAFETY ANALYSES	The function of the RCIC System is to respond to transient events by providing makeup coolant to the reactor. The RCIC System is not an Engineered Safety Feature System and no credit is taken in the safety analyses for RCIC System operation. Based on its contribution to the reduction of overall plant risk, however, the system satisfies Criterion 4 of the NRC Policy Statement (Ref. 5).
LCO	The OPERABILITY of the RCIC System provides adequate core cooling such that actuation of any of the low pressure ECCS subsystems is not required in the event of RPV isolation accompanied by a loss of feedwater flow. The RCIC System has sufficient capacity for maintaining RPV inventory during an isolation event.
APPLICABILITY	The RCIC System is required to be OPERABLE during MODE 1, and MODES 2 and 3 with reactor steam dome pressure > 150 psig, since RCIC is the primary non-ECCS water source for core cooling when the reactor is isolated and pressurized. In MODES 2 and 3 with reactor steam dome pressure ≤ 150 psig, and in MODES 4 and 5, RCIC is not required to be OPERABLE since the low pressure ECCS injection/spray subsystems can provide sufficient flow to the RPV.
ACTIONS	A Note prohibits the application of LCO 3.0.4.b to an inoperable RCIC subsystem. There is an increased risk associated with entering a MODE or other specified condition in the Applicability with an inoperable RCIC subsystem and the provisions of LCO 3.0.4.b, which allows entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, should not be applied in this circumstance.

(continued)

BASES

ACTIONS (continued)

A.1 and A.2

If the RCIC System is inoperable during MODE 1, or MODE 2 or 3 with reactor steam dome pressure > 150 psig, and the HPCI System is verified to be OPERABLE, the RCIC System must be restored to OPERABLE status within 14 days. In this condition, loss of the RCIC System will not affect the overall plant capability to provide makeup inventory at high reactor pressure since the HPCI System is the only high pressure system assumed to function during a loss of coolant accident (LOCA). OPERABILITY of HPCI is therefore verified within 1 hour when the RCIC System is inoperable. This may be performed as an administrative check, by examining logs or other information, to determine if HPCI is out of service for maintenance or other reasons. It does not mean it is necessary to perform the Surveillances needed to demonstrate the OPERABILITY of the HPCI System. If the OPERABILITY of the HPCI System cannot be verified, however, Condition B must be immediately entered. For non-LOCA events, RCIC (as opposed to HPCI) is the preferred source of makeup coolant because of its relatively small capacity, which allows easier control of the RPV water level. Therefore, a limited time is allowed to restore the inoperable RCIC to OPERABLE status.

The 14 day Completion Time is based on a reliability study (Ref. 3) that evaluated the impact on ECCS availability, assuming various components and subsystems were taken out of service. The results were used to calculate the average availability of ECCS equipment needed to mitigate the consequences of a LOCA as a function of allowed outage times (AOTs). Because of similar functions of HPCI and RCIC, the AOTs (i.e., Completion Times) determined for HPCI are also applied to RCIC.

B.1 and B.2

If the RCIC System cannot be restored to OPERABLE status within the associated Completion Time, or if the HPCI System is simultaneously inoperable, the plant must be brought to a condition in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours and reactor steam dome pressure reduced to ≤ 150 psig within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

(continued)

BASES (continued)

SURVEILLANCE
REQUIREMENTS

SR 3.5.3.1

The flow path piping has the potential to develop voids and pockets of entrained air. Maintaining the pump discharge line of the RCIC System full of water ensures that the system will perform properly, injecting its full capacity into the Reactor Coolant System upon demand. This will also prevent a water hammer following an initiation signal. One acceptable method of ensuring the line is full when aligned to the CST is to vent at the high points and, when aligned to the suppression pool, by monitoring pump suction pressure. The 31 day Frequency is based on the gradual nature of void buildup in the RCIC piping, the procedural controls governing system operation, and operating experience.

SR 3.5.3.2

Verifying the correct alignment for manual, power operated, and automatic valves in the RCIC flow path provides assurance that the proper flow path will exist for RCIC operation. 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. A valve that receives an initiation signal is allowed to be in a nonaccident position provided the valve will automatically reposition in the proper stroke time. This SR does not require any testing or valve manipulation; rather, it involves verification that those valves capable of potentially being mispositioned are in the correct position. This SR does not apply to valves that cannot be inadvertently misaligned, such as check valves. For the RCIC System, this SR also includes the steam flow path for the turbine and the flow controller position.

The 31 day Frequency of this SR was derived from the Inservice Testing Program requirements for performing valve testing at least once every 92 days. The Frequency of 31 days is further justified because the valves are operated under procedural control and because improper valve position would affect only the RCIC System. This Frequency has been shown to be acceptable through operating experience.

SURVEILLANCE
REQUIREMENTS

SR 3.5.3.3 and SR 3.5.3.4

The RCIC pump flow rates ensure that the system can maintain reactor coolant inventory during pressurized conditions with the RPV

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.5.3.3 and SR 3.5.3.4 (continued)

isolated. The required flow rate (400 gpm) is the pump design flow rate. Analysis has demonstrated that RCIC can fulfill its design function at a system flow rate of 360 gpm (Ref. 4). The pump flow rates are verified against a system head equivalent to the RPV pressure. The total system pump outlet pressure is adequate to overcome the elevation head pressure between the pump suction and the vessel discharge, the piping friction losses, and RPV pressure. The flow tests for the RCIC System are performed at two different pressure ranges such that system capability to provide rated flow is tested both at the higher and lower operating ranges of the system. Additionally, adequate steam flow must be passing through the main turbine or turbine bypass valves to continue to control reactor pressure when the RCIC System diverts steam flow. Reactor steam pressure must be ≥ 920 psig to perform SR 3.5.3.3 and ≥ 150 psig to perform SR 3.5.3.4. Adequate steam flow is represented by at least one turbine bypass valve open, or for SR 3.5.3.3 ≥ 200 MWE from the main turbine-generator and for SR 3.5.3.4 total steam flow $\geq 1E6$ lb/hour. Therefore, sufficient time is allowed after adequate pressure and flow are achieved to perform these SRs. Reactor startup is allowed prior to performing the low pressure Surveillance because the reactor pressure is low and the time allowed to satisfactorily perform the Surveillance is short. The reactor pressure is allowed to be increased to normal operating pressure since it is assumed that the low pressure Surveillance has been satisfactorily completed and there is no indication or reason to believe that RCIC is inoperable. Therefore, these SRs are modified by Notes that state the Surveillances are not required to be performed until 12 hours after the reactor steam pressure and flow are adequate to perform the test. The 12 hours allowed is sufficient to achieve stable conditions for testing and provides a reasonable time to complete the SR. A 92 day Frequency for SR 3.5.3.3 is consistent with the Inservice Testing Program requirements. The 24 month Frequency for SR 3.5.3.4 is based on the need to perform the Surveillance under conditions that apply just prior to or during a startup from a plant outage. The 24 month Frequency of SR 3.5.3.4 is based on a review of the surveillance test history and Reference 6.

SR 3.5.3.5

The RCIC System is required to actuate automatically in order to verify its design function satisfactorily. This Surveillance verifies that, with a required system initiation signal (actual or simulated), the automatic initiation logic of the RCIC System will cause the system to operate as designed, including actuation of the system throughout its

(continued)

BASES

**SURVEILLANCE
REQUIREMENTS
(continued)**

SR 3.5.3.5 (continued)

emergency operating sequence; that is, automatic pump startup and actuation of all automatic valves to their required positions. This test also ensures the RCIC System will automatically restart on an RPV low water level (Level 2) signal received subsequent to an RPV high water level (Level 8) trip and that the suction is automatically transferred from the CST to the suppression pool. The LOGIC SYSTEM FUNCTIONAL TEST performed in LCO 3.3.5.2 overlaps this Surveillance to provide complete testing of the assumed safety function.

The 24 month Frequency is based on the need to perform the 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. The 24 month Frequency is based on a review of the surveillance test history and Reference 6.

This SR is modified by a Note that excludes vessel injection during the Surveillance. Since all active components are testable and full flow can be demonstrated by recirculation through the test line, coolant injection into the RPV is not required during the Surveillance.

REFERENCES

1. 10 CFR 50, Appendix A, GDC 33.
 2. FSAR, Section 4.7.
 3. Memorandum from R. L. Baer (NRC) to V. Stello, Jr. (NRC), "Recommended Interim Revisions to LCOs for ECCS Components," December 1, 1975.
 4. GE Report AES-41-0688, "Safety Evaluation for Relaxation of RCIC Performance Requirements for Plant Hatch Units 1 and 2," July 1988.
 5. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.
 6. NRC Safety Evaluation Report for Amendment 232.
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BASES

ACTIONS

A.1 (continued)

control function. However, the overall reliability is reduced because a single failure in the OPERABLE subsystem could result in reduced oxygen control capability. The 30 day Completion Time is based on the low probability of the occurrence of a LOCA that would generate hydrogen and oxygen in amounts capable of exceeding the flammability limit, the amount of time available after the event for operator action to prevent exceeding this limit, and the availability of the OPERABLE CAD subsystem and other hydrogen mitigating systems.

B.1 and B.2

With two CAD subsystems inoperable, the ability to perform the hydrogen control function via alternate capabilities must be verified by administrative means within 1 hour. The alternate hydrogen control capabilities are provided by the Primary Containment Purge System. The 1 hour Completion Time allows a reasonable period of time to verify that a loss of hydrogen control function does not exist. In addition, the alternate hydrogen control system capability must be verified once per 12 hours thereafter to ensure its continued availability. Both the initial verification and all subsequent verifications may be performed as an administrative check by examining logs or other information to determine the availability of the alternate hydrogen control system. It does not mean to perform the surveillances needed to demonstrate OPERABILITY of the alternate hydrogen control system. If the ability to perform the hydrogen control function is maintained, continued operation is permitted with two CAD subsystems inoperable for up to 7 days. Seven days is a reasonable time to allow two CAD subsystems to be inoperable because the hydrogen control function is maintained and because of the low probability of the occurrence of a LOCA that would generate hydrogen in amounts capable of exceeding the flammability limit.

(continued)

BASES

LCO
(continued) An adequate suction source is not addressed in this LCO since the minimum net positive suction head (59 ft mean sea level in the pump well) is bounded by the plant service water pump requirements [LCO 3.7.2, "Plant Service Water (PSW) System and Ultimate Heat Sink (UHS)].

APPLICABILITY In MODES 1, 2, and 3, the RHRSW System is required to be OPERABLE to support the OPERABILITY of the RHR System for primary containment cooling [LCO 3.6.2.3, "Residual Heat Removal (RHR) Suppression Pool Cooling," and LCO 3.6.2.4, "Residual Heat Removal (RHR) Suppression Pool Spray"] and decay heat removal [LCO 3.4.7, "Residual Heat Removal (RHR) Shutdown Cooling System - Hot Shutdown"]. The Applicability is therefore consistent with the requirements of these systems.

In MODES 4 and 5, the OPERABILITY requirements of the RHRSW System are determined by the systems it supports, and therefore, the requirements are not the same for all facets of operation in MODES 4 and 5. Thus, the LCOs of the RHR Shutdown Cooling System (LCO 3.4.8, "RHR Shutdown Cooling System - Cold Shutdown," LCO 3.9.7, "RHR - High Water Level," and LCO 3.9.8, "RHR - Low Water Level"), which require portions of the RHRSW System to be OPERABLE, will govern RHRSW System requirements during operation in MODES 4 and 5.

ACTIONS A.1

With one RHRSW pump inoperable, the inoperable pump must be restored to OPERABLE status within 30 days. With the unit in this condition, the remaining OPERABLE RHRSW pumps are adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure in the OPERABLE subsystem could result in reduced RHRSW capability. The 30 day Completion Time is based on the remaining RHRSW heat removal capability, including enhanced reliability afforded by manual cross connect capability, and the low probability of a DBA with concurrent worst case single failure.

|
(continued)

BASES

ACTIONS
(continued)

B.1

With one RHRSW pump inoperable in each subsystem, if no additional failures occur in the RHRSW System, and the two OPERABLE pumps are aligned by opening the normally closed cross tie valves (i.e., after an event requiring operation of the RHRSW System), then the remaining OPERABLE pumps and flow paths provide adequate heat removal capacity following a design basis LOCA. However, capability for this alignment is not assumed in long term containment response analysis and an additional single failure in the RHRSW System could reduce the system capacity below that assumed in the safety analysis. Therefore, continued operation is permitted only for a limited time. One inoperable pump is required to be restored to OPERABLE status within 7 days. The 7 day Completion Time for restoring one inoperable RHRSW pump to OPERABLE status is based on engineering judgment, considering the level of redundancy provided.

C.1

Required Action C.1 is intended to handle the inoperability of one RHRSW subsystem for reasons other than Condition A. The Completion Time of 7 days is allowed to restore the RHRSW subsystem to OPERABLE status. With the unit in this condition, the remaining OPERABLE RHRSW subsystem is adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure in the OPERABLE RHRSW subsystem could result in loss of RHRSW function. The Completion Time is based on the redundant RHRSW capabilities afforded by the OPERABLE subsystem and the low probability of an event occurring requiring RHRSW during this period.

The Required Action is modified by a Note indicating that the applicable conditions of LCO 3.4.7 be entered and Required Actions taken if the inoperable RHRSW subsystem results in an inoperable RHR shutdown cooling subsystem. This is an exception to LCO 3.0.6 and ensures the proper actions are taken for these components.

(continued)

BASES

APPLICABILITY
(continued) In MODES 4 and 5, and defueled the OPERABILITY requirements of the PSW System and UHS are determined by the systems they support and therefore, the requirements are not the same for all facets of operation in MODES 4 and 5 and defueled. Thus, the LCOs of the individual systems, which require portions of the PSW System and the UHS to be OPERABLE, will govern PSW System and UHS requirements during operation in MODES 4 and 5 and defueled.

ACTIONS	<p><u>A.1</u></p> <p>With one PSW pump inoperable, the inoperable pump must be restored to OPERABLE status within 30 days. With the unit in this condition, the remaining OPERABLE PSW pumps (even allowing for an additional single failure) are adequate to perform the PSW heat removal function; however, the overall reliability is reduced. The 30 day Completion Time is based on the remaining PSW heat removal capability to accommodate additional single failures, and the low probability of an event occurring during this time period.</p> <p><u>B.1</u></p> <p>With one PSW turbine building isolation valve inoperable, the inoperable valve must be restored to OPERABLE status within 30 days. With the unit in this condition, the remaining OPERABLE PSW turbine building isolation valve in the subsystem is adequate to isolate the non-essential loads, and, even allowing for an additional single failure, the other PSW subsystem is adequate to perform the PSW heat removal function; however, the overall reliability is reduced. The 30 day Completion Time is based on the remaining PSW heat removal capability to accommodate additional single failures, and the low probability of an event occurring during this time period.</p>
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(continued)

BASES

ACTIONS
(continued)

C.1

With one PSW pump inoperable in each subsystem, one inoperable pump must be restored to OPERABLE status within 7 days. With the unit in this condition, the remaining OPERABLE PSW pumps are adequate to perform the PSW heat removal function; however, the overall reliability is reduced. The 7 day Completion Time is based on the remaining PSW heat removal capability to accommodate an additional single failure and the low probability of an event occurring during this time period.

D.1

With one PSW turbine building isolation valve inoperable in each subsystem, one inoperable valve must be restored to OPERABLE status within 72 hours. With the unit in this condition, the remaining OPERABLE PSW valves are adequate to perform the PSW nonessential load isolation function; however, the overall reliability is reduced. The 72 hour Completion Time is based on the remaining PSW heat removal capability to accommodate an additional single failure and the low probability of an event occurring during this time period.

E.1

With one PSW subsystem inoperable for reasons other than Condition A and Condition B (e.g., inoperable flow path, both pumps inoperable in a loop, or both turbine building isolation valves inoperable in a loop), the PSW subsystem must be restored to OPERABLE status within 72 hours. With the unit in this condition, the remaining OPERABLE PSW subsystem is adequate to perform the

(continued)

BASES (continued)

APPLICABILITY The requirements for OPERABILITY of the DG 1B SSW System are governed by the required OPERABILITY of the DG 1B (LCO 3.8.1, "AC Sources - Operating," and LCO 3.8.2, "AC Sources - Shutdown").

ACTIONS A.1, A.2, and A.3

If the DG 1B SSW System is inoperable, the OPERABILITY of the DG 1B is affected due to loss of its cooling source; however, the capability exists to provide cooling to DG 1B from the PSW System of Unit 1. Continued operation is allowed for 60 days if the OPERABILITY of a Unit 1 PSW System, with respect to its capability to provide cooling to the DG 1B, can be verified. This is accomplished by aligning cooling water to DG 1B from the Unit 1 PSW System within 8 hours and verifying this lineup once every 31 days. The 8 hour Completion Time is based on the time required to reasonably complete the Required Action, and the low probability of an event occurring requiring DG 1B during this period. The 31 day verification of the Unit 1 PSW lineup to the DG 1B is consistent with the PSW valve lineup SR. The 60 day Completion Time to restore the DG 1B SSW System to OPERABLE status allows sufficient time to repair the system, yet prevents indefinite operation with cooling water provided from the Unit 1 PSW System.

B.1

If cooling water cannot be made available to the DG 1B within the 8 hour Completion Time, or if cooling water cannot be verified to be aligned to DG 1B from a Unit 1 PSW subsystem as required by the 31 day verification Required Action, the DG 1B cannot perform its intended function and must be immediately declared inoperable. In accordance with LCO 3.0.6, this also requires entering into the Applicable Conditions and Required Actions for LCO 3.8.1 or LCO 3.8.2. Additionally, if the DG 1B SSW System is not restored to OPERABLE status within 60 days, DG 1B must be immediately declared inoperable.

(continued)

BASES

LCO (continued)	<p>Proper sequencing of loads, including tripping of nonessential loads, is a required function for DG OPERABILITY.</p> <p>The AC sources must be separate and independent (to the extent possible) (Ref. 1) of other AC sources. For the DGs, the separation and independence are complete. For the offsite AC sources, the separation and independence are to the extent practical. A circuit may be connected to more than one ESF bus, with automatic transfer capability to the other circuit OPERABLE, and not violate separation criteria. A circuit that is not connected to an ESF bus is required to have OPERABLE automatic transfer capability to at least two ESF buses (one of which must be to the 1F bus) to support OPERABILITY of that circuit.</p>
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APPLICABILITY	<p>The AC sources are required to be OPERABLE in MODES 1, 2, and 3 to ensure that:</p> <ol style="list-style-type: none">Acceptable fuel design limits and reactor coolant pressure boundary limits are not exceeded as a result of AOOs or abnormal transients; andAdequate core cooling is provided and containment OPERABILITY and other vital functions are maintained in the event of a postulated DBA.
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The AC power requirements for MODES 4 and 5 and other conditions in which AC Sources are required, are covered in LCO 3.8.2, "AC Sources - Shutdown."

ACTIONS	A Note prohibits the application of LCO 3.0.4.b to an inoperable DG. There is an increased risk associated with entering a MODE or other specified condition in the Applicability with an inoperable DG and the provisions of LCO 3.0.4.b, which allows entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, should not be applied in this circumstance.
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A.1

To ensure a highly reliable power source remains with one offsite circuit inoperable, it is necessary to verify the availability of the remaining required offsite circuits on a more frequent basis. Since the

(continued)

BASES

ACTIONS
(continued)

A.1

Required Action only specifies "perform," a failure of SR 3.8.1.1 acceptance criteria does not result in a Required Action not met. However, if a second required circuit fails SR 3.8.1.1, the second offsite circuit is inoperable, and Condition D, for two offsite circuits inoperable, is entered.

A.2

Required Action A.2, which only applies if a 4160 V ESF bus cannot be powered from an offsite source, is intended to provide assurance that an event with a coincident single failure of the associated DG does not result in a complete loss of safety function of critical systems. These features are designed with redundant safety related divisions (i.e., single division systems are not included). Redundant required features failures consist of inoperable features associated with a division redundant to the division that has no offsite power.

The Completion Time for Required Action A.2 is intended to allow time for the operator to evaluate and repair any discovered inoperabilities. This Completion Time also allows an exception to the normal "time zero" for beginning the allowed outage time "clock." In this Required Action, the Completion Time only begins on discovery that both:

- a. The 4160 V ESF bus has no offsite power supplying its loads; and
- b. A redundant required feature on the other division is inoperable.

If, at any time during the existence of this Condition (one offsite circuit inoperable) a redundant required feature subsequently becomes inoperable, this Completion Time would begin to be tracked.

Discovering no offsite power to one 4160 V ESF bus of the onsite Class 1E Power Distribution System coincident with one or more inoperable redundant required support or supported features, or both, that are associated with any other ESF bus that has offsite power, results in starting the Completion Times for the Required Action. Twenty-four hours is acceptable because it minimizes risk while allowing time for restoration before the unit is subjected to transients associated with shutdown.

(continued)

BASES

ACTIONS

A.2 (continued)

The remaining OPERABLE offsite circuits and DGs are adequate to supply electrical power to the onsite Class 1E Distribution System. Thus, on a component basis, single failure protection may have been lost for the required feature's function; however, function is not lost. The 24 hour Completion Time takes into account the component OPERABILITY of the redundant counterpart to the inoperable required feature. Additionally, the 24 hour Completion Time takes into account the capacity and capability of the remaining AC sources, a reasonable time for repairs, and the low probability of a DBA occurring during this period.

A.3

According to Regulatory Guide 1.93 (Ref. 6), operation may continue in Condition A for a period that should not exceed 72 hours. With one required offsite circuit inoperable, the reliability of the offsite system is degraded, and the potential for a loss of offsite power is increased, with attendant potential for a challenge to the plant safety systems. In this condition, however, the remaining OPERABLE offsite circuit and DGs are adequate to supply electrical power to the onsite Class 1E Distribution System.

The 72 hour Completion Time takes into account the capacity and capability of the remaining AC sources, reasonable time for repairs, and the low probability of a DBA occurring during this period.

The second Completion Time for Required Action A.3 establishes a limit on the maximum time allowed for any combination of required AC power sources to be inoperable during any single contiguous occurrence of failing to meet LCO 3.8.1.a, b, or c. If Condition A is entered while, for instance, the swing DG is inoperable, and that DG is subsequently returned OPERABLE, LCO 3.8.1.a, b, or c may already have been not met for up to 14 days. This situation could lead to a total of 17 days, since initial failure to meet LCO 3.8.1.a, b, and c, to restore the offsite circuit. At this time, the swing DG could again become inoperable, the circuit restored OPERABLE, and an additional 14 days (for a total of 31 days) allowed prior to complete restoration of LCO 3.8.1.a, b, and c. The 17 day Completion Time provides a limit on the time allowed in a specified condition after discovery of failure to meet LCO 3.8.1.a, b, or c. This limit is considered reasonable for situations in which Conditions A and B are entered concurrently. The "AND" connector between the 72 hours and 17 day Completion Times means that both Completion Times apply simultaneously, and the more restrictive Completion Time must be met.

(continued)

BASES

ACTIONS

A.1 (continued)

As in Required Action A.2, the Completion Time allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." This exception results in establishing the "time zero" at the time LCO 3.8.1.a, b, or c was initially not met, instead of at the time that Condition A was entered.

B.1

To ensure a highly reliable power source remains with one Unit 1 or the swing DG inoperable, it is necessary to verify the availability of the required offsite circuits on a more frequent basis. Since the Required Action only specifies "perform," a failure of SR 3.8.1.1 acceptance criteria does not result in a Required Action being not met. However, if a circuit fails to pass SR 3.8.1.1, it is inoperable. Upon offsite circuit inoperability, additional Conditions must then be entered.

B.2

Required Action B.2 is intended to provide assurance that a loss of offsite power, during the period that a Unit 1 or swing DG is inoperable, does not result in a complete loss of safety function of critical systems. These features are designed with redundant safety related divisions (i.e., single division systems are not included). Redundant required features failures consist of inoperable features associated with a division redundant to the division that has an inoperable DG.

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." In this Required Action the Completion Time only begins on discovery that both:

- a. An inoperable Unit 1 or swing DG exists; and
- b. A redundant required feature on the other division (Division 1 or 2), or divisions in the case of the Unit 1 and 2 Standby Gas Treatment (SGT) System, is inoperable.

If, at any time during the existence of this Condition (one Unit 1 or swing DG inoperable), a redundant required feature subsequently becomes inoperable, this Completion Time begins to be tracked.

(continued)

BASES

ACTIONS	<u>B. 2</u> (continued)
	<p>Discovering one required DG inoperable coincident with one or more inoperable redundant required support or supported features, or both, that are associated with the OPERABLE DGs results in starting the Completion Time for the Required Action. Four hours from the discovery of these events existing concurrently is acceptable because it minimizes risk while allowing time for restoration before subjecting the unit to transients associated with shutdown.</p>
	<p>The remaining OPERABLE DGs and offsite circuits are adequate to supply electrical power to the onsite Class 1E Distribution System.</p>
	<p>Thus, on a component basis, single failure protection for the required feature's function may have been lost; however, function has not been lost. The 4 hour Completion Time takes into account the component OPERABILITY of the redundant counterpart to the inoperable required feature. Additionally, the 4 hour Completion Time takes into account the capacity and capability of the remaining AC sources, reasonable time for repairs, and low probability of a DBA occurring during this period.</p>

B.3.1 and B.3.2

Required Action B.3.1 provides an allowance to avoid unnecessary testing of OPERABLE DGs. If it can be determined that the cause of the inoperable DG does not exist on the OPERABLE DG(s), SR 3.8.1.2.a does not have to be performed. If the cause of inoperability exists on other DG(s), they are declared inoperable upon discovery, and Condition F of LCO 3.8.1 is entered. Once the failure is repaired, and the common cause failure no longer exists, Required Action B.3.1 is satisfied. If the cause of the initial inoperable DG cannot be confirmed not to exist on the remaining DG(s), performance of SR 3.8.1.2.a suffices to provide assurance of continued OPERABILITY of those DGs. In the event the inoperable DG is restored to OPERABLE status prior to completing either B.3.1 or B.3.2, the deficiency control program, as appropriate, will continue to evaluate the common cause possibility. This continued evaluation, however, is no longer under the 24 hour constraint imposed while in Condition B.

According to Generic Letter 84-15 (Ref. 7), 24 hours is a reasonable time to confirm that the OPERABLE DGs are not affected by the same problem as the inoperable DG.

(continued)

BASES

ACTIONS

B.4

Regulatory Guide 1.93 (Ref. 6) provides guidance that operation in Condition B may continue for 72 hours. A risk-informed, deterministic evaluation performed for Plant Hatch justifies operation in Condition B for 14 days, provided action is taken to ensure two DGs are dedicated to each Hatch unit. This is accomplished for an inoperable A or C DG by inhibiting the automatic alignment (on a LOCA or LOSP signal) of the swing DG to the other unit. If the inoperable DG is the swing DG, each unit has two dedicated DGs. For an inoperable swing DG, a 72 hour Completion Time applies unless the restrictions specified following this paragraph are satisfied. In Condition B for each defined Completion Time and restriction (if applicable), the remaining OPERABLE DGs and offsite circuits are adequate to supply electrical power to the onsite Unit 1 Class 1E Distribution System. The Completion Times take into account the capacity and capability of the remaining AC sources, reasonable time for maintenance, and low probability of a DBA occurring during this period. Use of the 14 day Completion Time subject to additional restrictions controlled by 90AC-OAM-002-0 is permitted as follows:

- For the Unit 1 DGs:

Once per DG per operating cycle for performing major overhaul of a DG.

As needed to complete unplanned maintenance. This time shall be minimized.

- For the swing DG:

The additional restrictions apply prior to using a Completion Time of greater than 72 hours.

The 14 day Completion Time may be used once per Unit 1 operating cycle for performing a major overhaul of the swing DG.

The time may be used as needed to complete unplanned maintenance. This time shall be minimized.

- As needed for the swing DG when it is inhibited from automatically aligning to Unit 1 in order for the 14 day Completion Time to be used for a Unit 2 DG.

(continued)

BASES

ACTIONS

B.4 (continued)

The "AND" connector between the 72 hour and 14 day Completion Times means that both Completion Times apply simultaneously. That is, the 14 day Completion Time for an A or C DG with the swing DG inhibited applies from the time of entry into Condition B, not from the time the swing DG is inhibited.

The fourth Completion Time for Required Action B.4 establishes a limit on the maximum time allowed for any combination of required AC power sources to be inoperable during any single contiguous occurrence of failing to meet LCO 3.8.1.a, b, or c. If Condition B is entered while, for instance, an offsite circuit is inoperable and that circuit is subsequently restored OPERABLE, LCO 3.8.1.a, b, or c may already have been not met for up to 72 hours. This situation could lead to a total of 17 days, since initial failure to meet LCO 3.8.1.a, b, and c, to restore the DG. At this time, an offsite circuit could again become inoperable, the DG restored OPERABLE, and an additional 72 hours (for a total of 20 days) allowed prior to complete restoration of LCO 3.8.1.a, b, and c. The 17 day Completion Time provides a limit on the time allowed in a specified condition after discovery of failure to meet LCO 3.8.1.a, b, or c. This limit is considered reasonable for situations in which Conditions A and B are entered concurrently. The "AND" connectors between the Completion Times mean that all Completion Times apply simultaneously, and the more restrictive must be met.

As in Required Action B.2, the Completion Time allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." This exception results in establishing the "time zero" at the time that LCO 3.8.1.a, b, or c was initially not met, instead of the time that Condition B was entered.

C.1

To ensure a highly reliable power source remains with one required Unit 2 DG inoperable, it is necessary to verify the availability of the required offsite circuits on a more frequent basis. Since the Required Action only specifies "perform," a failure of SR 3.8.1.1 acceptance criteria does not result in a Required Action being not met. However, if a circuit fails to pass SR 3.8.1.1, it is inoperable. Upon offsite circuit inoperability, additional Conditions must then be entered.

(continued)

BASES

ACTIONS
(continued)

C.2

Required Action C.2 is intended to provide assurance that a loss of offsite power, during the period that one required Unit 2 DG is inoperable, does not result in a complete loss of safety function of critical systems. These features are designed with redundant safety related divisions (i.e., single division systems are not included). Redundant required features failures consist of inoperable features associated with a division redundant to the division that has an inoperable DG.

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." In this Required Action, the Completion Time only begins on discovery that both:

- a. An inoperable required Unit 2 DG exists; and
- b. A redundant required feature on the other division (Division 1 or 2), or divisions in the case of the Unit 1 and 2 SGT System, is inoperable.

If, at any time during the existence of this Condition (required Unit 2 DG inoperable), a redundant required feature subsequently becomes inoperable, this Completion Time begins to be tracked.

Discovering one required Unit 2 DG inoperable coincident with one or more inoperable redundant required support or supported features, or both, that are associated with the OPERABLE DGs results in starting the Completion Time for the Required Action. Four hours from the discovery of these events existing concurrently is acceptable because it minimizes risk while allowing time for restoration before subjecting the unit to transients associated with shutdown.

The remaining OPERABLE DGs and offsite circuits are adequate to supply electrical power to the onsite Class 1E Distribution System. Thus, on a component basis, single failure protection for the required feature's function may have been lost; however, function has not been lost. The 4 hour Completion Time takes into account the component OPERABILITY of the redundant counterpart to the inoperable required feature. Additionally, the 4 hour Completion Time takes into account the capacity and capability of the remaining AC sources, reasonable time for repairs, and low probability of a DBA occurring during this period.

(continued)

BASES

ACTIONS
(continued)

C.3.1 and C.3.2

Required Action C.3.1 provides an allowance to avoid unnecessary testing of OPERABLE DGs. If it can be determined that the cause of the inoperable DG does not exist on the OPERABLE DG, SR 3.8.1.2.a does not have to be performed. If the cause of inoperability exists on other DG(s), they are declared inoperable upon discovery, and Condition F of LCO 3.8.1 is entered. Once the failure is repaired, and the common cause failure no longer exists, Required Action C.3.1 is satisfied. If the cause of the initial inoperable DG cannot be confirmed not to exist on the remaining DG(s), performance of SR 3.8.1.2.a suffices to provide assurance of continued OPERABILITY of those DGs. In the event the inoperable DG is restored to OPERABLE status prior to completing either C.3.1 or C.3.2, the deficiency control program, as appropriate, will continue to evaluate the common cause possibility. This continued evaluation, however, is no longer under the 24 hour constraint imposed while in Condition C.

According to Generic Letter 84-15 (Ref. 7), 24 hours is a reasonable time to confirm that the OPERABLE DGs are not affected by the same problem as the inoperable DG.

C.4

In Condition C, the remaining OPERABLE offsite circuit is adequate to supply electrical power to the required onsite Unit 2 Class 1E Distribution System. The 7 day Completion Time is based on the shortest restoration time allowed for the systems affected by the inoperable DG in the individual system LCOs. A risk-informed, deterministic evaluation performed for Plant Hatch justifies operation in Condition C for 14 days, provided action is taken to ensure two DGs are dedicated to each Hatch unit. This is accomplished for an inoperable A or C DG by inhibiting the automatic alignment (on a LOCA or LOSP signal) of the swing DG to the other unit. The Completion Times take into account the capacity and capability of the remaining AC sources, reasonable time for maintenance, and low probability of a DBA occurring during this period. Use of the 14 day Completion Time, subject to additional restrictions controlled by 90AC-OAM-002-0, is permitted as follows:

- Once per DG per operating cycle for performing a major overhaul of a DG.
- As needed to complete unplanned maintenance. This time shall be minimized.

(continued)

BASES

ACTIONS
(continued)

D.1 and D.2

Required Action D.1 addresses actions to be taken in the event of inoperability of redundant required features concurrent with inoperability of two or more required offsite circuits. Required Action D.1 reduces the vulnerability to a loss of function. The Completion Time for taking these actions is reduced to 12 hours from that allowed with one 4160 V ESF bus without offsite power (Required Action A.2). The rationale for the reduction to 12 hours is that Regulatory Guide 1.93 (Ref. 6) allows a Completion Time of 24 hours for two required offsite circuits inoperable, based upon the assumption that two complete safety divisions are OPERABLE. (While this ACTION allows more than two circuits to be inoperable, Regulatory Guide 1.93 assumed two circuits were all that were required by the LCO, and a loss of those two circuits resulted in a loss of all offsite power to the Class 1E AC Electrical Power Distribution System. Thus, with the Plant Hatch design, a loss of more than two required offsite circuits results in the same conditions assumed in Regulatory Guide 1.93.) When a concurrent redundant required feature failure exists, this assumption is not the case, and a shorter Completion Time of 12 hours is appropriate. These features are designed with redundant safety related divisions, (i.e., single division systems are not included in the list). Redundant required features failures consist of any of these features that are inoperable because any inoperability is on a division redundant to a division with inoperable offsite circuits.

The Completion Time for Required Action D.1 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." In this Required Action, the Completion Time only begins on discovery that both:

- a. All required offsite circuits are inoperable; and
- b. A redundant required feature is inoperable.

If, at any time during the existence of this Condition (two or more required offsite circuits inoperable), a redundant required feature subsequently becomes inoperable, this Completion Time begins to be tracked.

According to Regulatory Guide 1.93 (Ref. 6), operation may continue in Condition D for a period that should not exceed 24 hours. This level of degradation means that the offsite electrical power system does not have the capability to effect a safe shutdown and to mitigate the effects of an accident; however, the onsite AC sources have not been degraded. This level of degradation generally corresponds to a total loss of the immediately accessible offsite power sources.

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BASES (continued)

LCO 3.0.4	LCO 3.0.4 establishes limitations on changes in MODES or other specified conditions in the Applicability when an LCO is not met. It allows placing the unit in a MODE or other specified condition stated in that Applicability (e.g., the Applicability desired to be entered) when unit conditions are such that the requirements of the LCO would not be met, in accordance with LCO 3.0.4.a, LCO 3.0.4.b, or LCO 3.0.4.c.
	LCO 3.0.4.a allows entry into a MODE or other specified condition in the Applicability with the LCO not met when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time. Compliance with Required Actions that permit continued operation of the unit for an unlimited period of time in a MODE or other specified condition provides an acceptable level of safety for continued operation. This is without regard to the status of the unit before or after the MODE change. Therefore, in such cases, entry into a MODE or other specified condition in the Applicability may be made in accordance with the provisions in the Required Actions.
	LCO 3.0.4.b allows entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate.
	The risk assessment may use quantitative, qualitative, or blended approaches, and the risk assessment will be conducted using the plant program, procedures, and criteria in place to implement 10 CFR 50.65(a)(4), which requires that risk impacts of maintenance activities be assessed and managed. The risk assessment, for the purposes of LCO 3.0.4.b, must take into account all inoperable Technical Specification equipment regardless of whether the equipment is included in the normal 10 CFR 50.65(a)(4) risk assessment scope. The risk assessments will be conducted using the procedures and guidance endorsed by Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." Regulatory Guide 1.182 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." These documents address general guidance for conduct of the risk assessment, quantitative and qualitative guidelines for establishing risk management actions, and example risk management actions. These include actions to plan and conduct other activities in a manner that controls overall risk, increased risk awareness by shift and management personnel, actions to reduce the duration of the

(continued)

BASES

LCO 3.0.4
(continued)

condition, actions to minimize the magnitude of risk increases (establishment of backup success paths or compensatory measures), and determination that the proposed MODE change is acceptable. Consideration should also be given to the probability of completing restoration such that the requirements of the LCO would be met prior to the expiration of ACTIONS Completion Times that would require exiting the Applicability.

LCO 3.0.4.b may be used with single or multiple systems and components unavailable. NUMARC 93-01 provides guidance relative to consideration of simultaneous unavailability of multiple systems and components.

The results of the risk assessment shall be considered in determining the acceptability of entering the MODE or other specified condition in the Applicability, and any corresponding risk management actions. The LCO 3.0.4.b risk assessments do not have to be documented.

The Technical Specifications allow continued operation with equipment unavailable in MODE 1 for the duration of the Completion Time. Since this is allowable, and since in general the risk impact in that particular mode bounds the risk of transitioning into and through the applicable MODES or other specified conditions in the Applicability of the LCO, the use of the LCO 3.0.4.b allowance should be generally acceptable, as long as the risk is assessed and managed as stated above. However, there is a small subset of systems and components that have been determined to be more important to risk, and use of the LCO 3.0.4.b is prohibited. The LCOs governing these systems and components contain Notes prohibiting the use of LCO 3.0.4.b by stating that LCO 3.0.4.b is not applicable.

LCO 3.0.4.c allows entry into a MODE or other specified condition of the Applicability with the LCO not met based on a Note in the Specification which states LCO 3.0.4.c is applicable. These specific allowances permit entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered do not provide for continued operation for an unlimited period of time and a risk assessment has not been performed. This allowance may apply to all the ACTIONS or to a specific Required Action of a Specification. The risk assessments performed to justify the use of LCO 3.0.4.b usually only consider systems and components. For this reason, LCO 3.0.4.c is typically applied to Specifications which describe values and parameters (e.g., Drywell Air Temperature, Drywell Pressure, MCRP) and may be applied to other Specifications based on NRC plant-specific approval.

(continued)

BASES

LCO 3.0.4 (continued)

The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

The provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown. In this context, a unit shutdown is defined as a change in MODE or other specified condition in the Applicability associated with transitioning from MODE 1 to MODE 2, MODE 2 to MODE 3, and MODE 3 to MODE 4.

Upon entry into a MODE or other specified condition in the Applicability with the LCO not met, LCO 3.0.1 and LCO 3.0.2 require entry into the applicable Conditions and Required Actions until the Condition is resolved, until the LCO is met, or until the unit is not within the Applicability of the Technical Specification.

Surveillances do not have to be performed on the associated inoperable equipment (or on variables outside the specified limits) as permitted by SR 3.0.1. Therefore, utilizing LCO 3.0.4 is not a violation of SR 3.0.1 or SR 3.0.4 for any Surveillances that have not been performed on inoperable equipment. However, SRs must be met to ensure OPERABILITY prior to declaring the associated equipment OPERABLE (or variable within limits) and restoring compliance with the affected LCO.

LCO 3.0.5

LCO 3.0.5 establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS. The sole purpose of this Specification is to provide an exception to LCO 3.0.2 [e.g., to not comply with the applicable Required Action(s)] to allow the performance of SRs to demonstrate:

- a. The OPERABILITY of the equipment being returned to service; or
- b. The OPERABILITY of other equipment.

The administrative controls ensure the time the equipment is returned to service in conflict with the requirements of the ACTIONS is limited to the time absolutely necessary to perform the allowed SRs. This Specification does not provide time to perform any other preventive or corrective maintenance.

(continued)

BASES

- LCO 3.0.5
(continued) An example of demonstrating the OPERABILITY of the equipment being returned to service is reopening a containment isolation valve that has been closed to comply with Required Actions and must be reopened to perform the SRs.
- An example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of an SR on another channel in the other trip system. A similar example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to permit the logic to function and indicate the appropriate response during the performance of an SR on another channel in the same trip system.
-
- LCO 3.0.6 LCO 3.0.6 establishes an exception to LCO 3.0.2 for support systems that have an LCO specified in the Technical Specifications (TS). This exception is provided because LCO 3.0.2 would require that the Conditions and Required Actions of the associated inoperable supported system LCO be entered solely due to the inoperability of the support system. This exception is justified because the actions that are required to ensure the plant is maintained in a safe condition are specified in the support system LCO's Required Actions. These Required Actions may include entering the supported system's Conditions and Required Actions or may specify other Required Actions.
- When a support system is inoperable and there is an LCO specified for it in the TS, the supported system(s) are required to be declared inoperable if determined to be inoperable as a result of the support system inoperability. However, it is not necessary to enter into the supported systems' Conditions and Required Actions unless directed to do so by the support system's Required Actions. The potential confusion and inconsistency of requirements related to the entry into multiple support and supported systems LCOs' Conditions and Required Actions are eliminated by providing all the actions that are necessary to ensure the plant is maintained in a safe condition in the support system's Required Actions.
- However, there are instances where a support system's Required Action may either direct a supported system to be declared inoperable or direct entry into Conditions and Required Actions for the supported system. This may occur immediately or after some specified delay to perform some other Required Action. Regardless of whether it is immediate or after some delay, when a support system's Required Action directs a supported system to be declared inoperable or directs

(continued)

BASES

LCO 3.0.6 (continued)	entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.
Specification 5.5.10, "Safety Function Determination Program (SFDP)," ensures loss of safety function is detected and appropriate actions are taken. Upon failure to meet two or more LCOs concurrently, an evaluation shall be made to determine if loss of safety function exists. Additionally, other limitations, remedial actions, or compensatory actions may be identified as a result of the support system inoperability and corresponding exception to entering supported system Conditions and Required Actions. The SFDP implements the requirements of LCO 3.0.6.	Cross division checks to identify a loss of safety function for those support systems that support safety systems are required. The cross division check verifies that the supported systems of the redundant OPERABLE support system are OPERABLE, thereby ensuring safety function is retained. If this evaluation determines that a loss of safety function exists, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.
LCO 3.0.7	There are certain special tests and operations required to be performed at various times over the life of the unit. These special tests and operations are necessary to demonstrate select unit performance characteristics, to perform special maintenance activities, and to perform special evolutions. Special Operations LCOs in Section 3.10 allow specified TS requirements to be changed to permit performances of these special tests and operations, which otherwise could not be performed if required to comply with the requirements of these TS. Unless otherwise specified, all the other TS requirements remain unchanged. This will ensure all appropriate requirements of the MODE or other specified condition not directly associated with or required to be changed to perform the special test or operation will remain in effect.
	The Applicability of a Special Operations LCO represents a condition not necessarily in compliance with the normal requirements of the TS. Compliance with Special Operations LCOs is optional. A special operation may be performed either under the provisions of the appropriate Special Operations LCO or under the other applicable TS requirements. If it is desired to perform the special operation under the provisions of the Special Operations LCO, the requirements of the

(continued)

BASES

- LCO 3.0.7
(continued) Special Operations LCO shall be followed. When a Special Operations LCO requires another LCO to be met, only the requirements of the LCO statement are required to be met regardless of that LCO's Applicability (i.e., should the requirements of this other LCO not be met, the ACTIONS of the Special Operations LCO apply, not the ACTIONS of the other LCO). However, there are instances where the Special Operations LCO's ACTIONS may direct the other LCO's ACTIONS be met. The Surveillances of the other LCO are not required to be met, unless specified in the Special Operations LCO. If conditions exist such that the Applicability of any other LCO is met, all the other LCO's requirements (ACTIONS and SRs) are required to be met concurrent with the requirements of the Special Operations LCO.
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B 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

BASES

SRs SR 3.0.1 through SR 3.0.4 establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated.

SR 3.0.1 SR 3.0.1 establishes the requirement that SRs must be met during the MODES or other specified conditions in the Applicability for which the requirements of the LCO apply, unless otherwise specified in the individual SRs. This Specification is to ensure that Surveillances are performed to verify the OPERABILITY of systems and components, and that variables are within specified limits. Failure to meet a Surveillance within the specified Frequency, in accordance with SR 3.0.2, constitutes a failure to meet an LCO.

Systems and components are assumed to be OPERABLE when the associated SRs have been met. Nothing in this Specification, however, is to be construed as implying that systems or components are OPERABLE when:

- a. The systems or components are known to be inoperable, although still meeting the SRs; or
- b. The requirements of the Surveillance(s) are known to be not met between required Surveillance performances.

Surveillances do not have to be performed when the unit is in a MODE or other specified condition for which the requirements of the associated LCO are not applicable, unless otherwise specified. The SRs associated with a Special Operations LCO are only applicable when the Special Operations LCO is used as an allowable exception to the requirements of a Specification.

Surveillances, including Surveillances invoked by Required Actions, do not have to be performed on inoperable equipment because the ACTIONS define the remedial measures that apply. Surveillances have to be met and performed in accordance with SR 3.0.2, prior to returning equipment to OPERABLE status.

Upon completion of maintenance, appropriate post maintenance testing is required to declare equipment OPERABLE. This includes ensuring applicable Surveillances are not failed and their most recent performance is in accordance with SR 3.0.2. Post maintenance

(continued)

BASES

SR 3.0.1
(continued) testing may not be possible in the current MODE or other specified conditions in the Applicability due to the necessary unit parameters not having been established. In these situations, the equipment may be considered OPERABLE provided testing has been satisfactorily completed to the extent possible and the equipment is not otherwise believed to be incapable of performing its function. This will allow operation to proceed to a MODE or other specified condition where other necessary post maintenance tests can be completed.

Some examples of this process are:

- a. Control Rod Drive maintenance during refueling that requires scram testing at > 800 psi. However, if other appropriate testing is satisfactorily completed and the scram time testing of SR 3.1.4.3 is satisfied, the control rod can be considered OPERABLE. This allows startup to proceed to reach 800 psi to perform other necessary testing.
- b. High pressure coolant injection (HPCI) maintenance during shutdown that requires system functional tests at a specified pressure. Provided other appropriate testing is satisfactorily completed, startup can proceed with HPCI considered OPERABLE. This allows operation to reach the specified pressure to complete the necessary post maintenance testing.

SR 3.0.2 SR 3.0.2 establishes the requirements for meeting the specified Frequency for Surveillances and any Required Action with a Completion Time that requires the periodic performance of the Required Action on a "once per..." interval.

SR 3.0.2 permits a 25% extension of the interval specified in the Frequency. This extension facilitates Surveillance scheduling and considers plant operating conditions that may not be suitable for conducting the Surveillance (e.g., transient conditions or other ongoing Surveillance or maintenance activities).

The 25% extension does not significantly degrade the reliability that results from performing the Surveillance at its specified Frequency. This is based on the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the SRs. The exceptions to SR 3.0.2 are those Surveillances for which the 25% extension of the interval specified in the Frequency does not apply. These exceptions are stated in the individual Specifications. The requirements of regulations take

(continued)

BASES

SR 3.0.2
(continued) precedence over the TS. Therefore, when a test interval is specified in the regulations, the test interval cannot be extended by the TS, and the SR includes a Note in the Frequency stating, "SR 3.0.2 is not applicable." An example of an exception when the test interval is specified in the regulations is the Note in the Primary Containment Leakage Rate Testing Program, "SR 3.0.2 is not applicable." This exception is provided because the program already includes extension of test intervals.

As stated in SR 3.0.2, the 25% extension also does not apply to the initial portion of a periodic Completion Time that requires performance on a "once per..." basis. The 25% extension applies to each performance after the initial performance. The initial performance of the Required Action, whether it is a particular Surveillance or some other remedial action, is considered a single action with a single Completion Time. One reason for not allowing the 25% extension to this Completion Time is that such an action usually verifies that no loss of function has occurred by checking the status of redundant or diverse components or accomplishes the function of the inoperable equipment in an alternative manner.

The provisions of SR 3.0.2 are not intended to be used repeatedly, merely as an operational convenience to extend Surveillance intervals (other than those consistent with refueling intervals) or periodic Completion Time intervals beyond those specified.

SR 3.0.3 SR 3.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified Frequency, whichever is greater, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

This delay period provides adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with Required Actions or other remedial measures that might preclude completion of the Surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that

(continued)

BASES

- SR 3.0.3
(continued) the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements.
- When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, SR 3.0.3 allows for the full delay period of up to the specified Frequency to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.
- SR 3.0.3 provides a time limit for, and allowances for the performance of, Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.
- Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals. While up to 24 hours or the limit of the specified Frequency is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required or shutting the plant down to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance. This risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillances will be placed in the licensee's Corrective Action Program.

(continued)

BASES

SR 3.0.3
(continued) If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon the failure of the Surveillance.

Completion of the Surveillance within the delay period allowed by this Specification, or within the Completion Time of the ACTIONS, restores compliance with SR 3.0.1.

SR 3.0.4 SR 3.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified condition in the Applicability.

This Specification ensures that system and component OPERABILITY requirements and variable limits are met before entry into MODES or other specified conditions in the Applicability for which these systems and components ensure safe operation of the unit. The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

A provision is included to allow entry into a MODE or other specified condition in the Applicability when an LCO is not met due to a Surveillance not being met in accordance with LCO 3.0.4.

However, in certain circumstances, failing to meet an SR will not result in SR 3.0.4 restricting a MODE change or other specified condition change. When a system, subsystem, division, component, device, or variable is inoperable or outside its specified limits, the associated SR(s) are not required to be performed per SR 3.0.1, which states that surveillances do not have to be performed on inoperable equipment. When equipment is inoperable, SR 3.0.4 does not apply to the associated SR(s) since the requirement for the SR(s) to be performed is removed. Therefore, failing to perform the Surveillance(s) within the specified Frequency does not result in an SR 3.0.4 restriction to changing MODES or other specified conditions of the Applicability. However, since the LCO is not met in this

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BASES

- SR 3.0.4
(continued)
- instance, LCO 3.0.4 will govern any restrictions that may (or may not) apply to MODE or other specified condition changes. SR 3.0.4 does not restrict changing MODES or other specified conditions of the applicability when a Surveillance has not been performed within the specified Frequency, provided the requirement to declare the LCO not met has been delayed in accordance with SR 3.0.3.
- The provisions of SR 3.0.4 shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of SR 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown. In this context, a unit shutdown is defined as a change in MODE or other specified condition in the Applicability associated with transitioning from MODE 1 to MODE 2, MODE 2 to MODE 3, and MODE 3 to MODE 4.
- The precise requirements for performance of SRs are specified such that exceptions to SR 3.0.4 are not necessary. The specific time frames and conditions necessary for meeting the SRs are specified in the Frequency, in the Surveillance, or both. This allows performance of Surveillances when the prerequisite condition(s) specified in a Surveillance procedure require entry into the MODE or other specified condition in the Applicability of the associated LCO prior to the performance or completion of a Surveillance. A Surveillance that could not be performed until after entering the LCO Applicability would have its Frequency specified such that it is not "due" until the specific conditions needed are met. Alternately, the Surveillance may be stated in the form of a Note as not required (to be met or performed) until a particular event, condition, or time has been reached. Further discussion of the specific formats of SRs' annotation is found in Section 1.4, Frequency.

BASES

LCO (continued)	<u>12. RHR Service Water Flow</u> RHR service water flow is a Type A variable provided to support the containment cooling function. The RHR Service Water flow signals are transmitted from separate flow transmitters (one per subsystem) and are continuously read on two control room indicators. These indicators are the primary indication used by the operator during an accident. Therefore, the PAM specification deals specifically with this portion of the instrument channel.
APPLICABILITY	The PAM instrumentation LCO is applicable in MODES 1 and 2. These variables are related to the diagnosis and preplanned actions required to mitigate DBAs. The applicable DBAs are assumed to occur in MODES 1 and 2. In MODES 3, 4, and 5, plant conditions are such that the likelihood of an event that would require PAM instrumentation is extremely low; therefore, PAM instrumentation is not required to be OPERABLE in these MODES.
ACTIONS	A Note has been provided to modify the ACTIONS related to PAM 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 PAM instrumentation channels provide appropriate compensatory measures for separate Functions. As such, a Note has been provided that allows separate Condition entry for each inoperable PAM Function.

(continued)

BASES

APPLICABILITY (continued) This LCO is not applicable in MODES 3, 4, and 5. In these MODES, the plant is already subcritical and in a condition of reduced Reactor Coolant System energy. Under these conditions, considerable time is available to restore necessary instrument control Functions if control room instruments or control becomes unavailable. Consequently, the TS do not require OPERABILITY in MODES 3, 4, and 5.

ACTIONS A Note has been provided to modify the ACTIONS related to Remote Shutdown System Functions. 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 Remote Shutdown System Functions provide appropriate compensatory measures for separate Functions. As such, a Note has been provided that allows separate Condition entry for each inoperable Remote Shutdown System Function.

A.1

Condition A addresses the situation where one or more required Functions of the Remote Shutdown System is inoperable. This includes any Function listed in Reference 2, as well as the control and transfer switches.

The Required Action is to restore the Function to OPERABLE status within 30 days. The Completion Time is based on operating experience and the low probability of an event that would require evacuation of the control room.

(continued)

BASES

ACTIONS

A.1 (continued)

OPERABLE status (i.e., restore the LLS valve's initiation capability). If the inoperable channel(s) cannot be restored to OPERABLE status within the allowable out of service time, Condition D must be entered and its Required Action taken. The Required Actions do not allow placing the channel in trip since this action could result in an instrumented LLS valve actuation. The 24 hour Completion Time is considered appropriate because of the redundancy in the design (4 LLS valves are provided and any 1 LLS valve can perform the LLS function) and the very low probability of multiple LLS instrumentation channel failures, which render the remaining LLS S/RVs inoperable, occurring together with an event requiring the LLS function during the 24 hour Completion Time. The 24 hour Completion Time is also based on the reliability analysis of Reference 3.

B.1

Although the LLS circuitry is designed so that operation of a single tailpipe pressure switch will result in arming both LLS logics in its associated division, each tailpipe pressure switch provides a direct input to only one LLS logic (e.g., Logic A). Since each LLS logic normally receives at least five S/RV pressure switch inputs (and also receives the other S/RV signals from the other logic in the same division by an arming signal), the LLS logic and instrumentation remains capable of performing its safety function if any S/RV tailpipe pressure switch instrument channel becomes inoperable. Therefore, it is acceptable for plant operation to continue with only one tailpipe pressure switch OPERABLE on each S/RV. However, this is only acceptable provided each LLS valve is maintaining initiation capability. (Refer to Required Actions A.1 and D.1 Bases.)

Required Action B.1 requires restoration of the tailpipe pressure switches to OPERABLE status prior to entering MODE 2 or 3 from MODE 4 to ensure that all switches are OPERABLE at the beginning of a reactor startup (this is because the switches are not accessible during plant operation). The Required Actions do not allow placing the channel in trip since this action could result in a LLS valve actuation.

(continued)

BASES

ACTIONS

A.1 (continued)

- 2) With an inoperable sump monitoring system integrator, the sump can be manually pumped down and the time for pumpdown recorded. Utilizing pump flow rate, total gallons pumped is determined. Using time elapsed since last pumpdown, sump inleakage rate can be calculated.

B.1 and B.2

With both gaseous and particulate primary containment atmospheric monitoring channels inoperable (i.e., the required containment atmospheric monitoring system), grab samples of the primary containment atmosphere must be taken and an isotopic analysis performed to provide periodic leakage information. Provided a sample is obtained and analyzed once every 12 hours, the plant may be operated for up to 30 days to allow restoration of at least one of the required monitors.

The 12 hour interval provides periodic information that is adequate to detect LEAKAGE. The 30 day Completion Time for restoration recognizes that at least one other form of leakage detection is available.

C.1 and C.2

If any Required Action and associated Completion Time of Condition A or B cannot be met, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours and MODE 4 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to perform the actions in an orderly manner and without challenging plant systems.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued) site, such as the location of the site boundary and the meteorological conditions of the site.
RCS specific activity satisfies Criterion 2 of the NRC Policy Statement (Ref. 4).

LCO The specific iodine activity is limited to $\leq 0.2 \mu\text{Ci/gm}$ DOSE EQUIVALENT I-131. This limit ensures the source term assumed in the safety analysis for the MSLB is not exceeded, so any release of radioactivity to the environment during an MSLB is well within the 10 CFR 100 limits.

APPLICABILITY In MODE 1, and MODES 2 and 3 with any main steam line not isolated, limits on the primary coolant radioactivity are applicable since there is an escape path for release of radioactive material from the primary coolant to the environment in the event of an MSLB outside of primary containment.

In MODES 2 and 3 with the main steam lines isolated, such limits do not apply since an escape path does not exist. In MODES 4 and 5, no limits are required since the reactor is not pressurized and the potential for leakage is reduced.

ACTIONS A.1 and A.2

When the reactor coolant specific activity exceeds the LCO DOSE EQUIVALENT I-131 limit, but is $\leq 4.0 \mu\text{Ci/gm}$, samples must be analyzed for DOSE EQUIVALENT I-131 at least once every 4 hours. In addition, the specific activity must be restored to the LCO limit within 48 hours. The Completion Time of once every 4 hours is based on the time needed to take and analyze a sample. The 48 hour Completion Time to restore the activity level provides a reasonable time for temporary coolant activity increases (iodine spikes or crud bursts) to be cleaned up with the normal processing systems.

A Note permits the use of the provisions of LCO 3.0.4.c. This allowance permits entry into the applicable MODE(S) while relying on the ACTIONS. This allowance is acceptable due to the significant conservatism incorporated into the specific activity limit, the low

(continued)

BASES

ACTIONS	<p><u>A.1 and A.2 (continued)</u></p> <p>probability of an event which is limiting due to exceeding this limit, and the ability to restore transient specific activity excursions while the plant remains at, or proceeds to power operation.</p> <p><u>B.1, B.2.1, B.2.2.1, and B.2.2.2</u></p> <p>If the DOSE EQUIVALENT I-131 cannot be restored to $\leq 0.2 \mu\text{Ci}/\text{gm}$ within 48 hours, or if at any time it is $> 4.0 \mu\text{Ci}/\text{gm}$, it must be determined at least once every 4 hours and all the main steam lines must be isolated within 12 hours. Isolating the main steam lines precludes the possibility of releasing radioactive material to the environment in an amount that is not well within the requirements of 10 CFR 100 during a postulated MSLB accident. Alternatively, the plant can be placed in MODE 3 within 12 hours and in MODE 4 within 36 hours. This option is provided for those instances when isolation of main steam lines is not desired (e.g., due to the decay heat loads). In MODE 4, the requirements of the LCO are no longer applicable.</p> <p>The Completion Time of once every 4 hours is the time needed to take and analyze a sample. The 12 hour Completion Time is reasonable, based on operating experience, to isolate the main steam lines in an orderly manner and without challenging plant systems. Also, the allowed Completion Times for Required Actions B.2.2.1 and B.2.2.2 for placing the unit in MODES 3 and 4 are reasonable, based on operating experience, to achieve the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.</p>
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SURVEILLANCE REQUIREMENTS	<p><u>SR 3.4.6.1</u></p> <p>This Surveillance is performed to ensure iodine remains within limit during normal operation. The 7 day Frequency is adequate to trend changes in the iodine activity level.</p> <p>This SR is modified by a Note that requires this Surveillance to be performed only in MODE 1 because the level of fission products generated in other MODES is much less.</p>
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BASES (continued)

ACTIONS	A Note has been provided to modify the ACTIONS related to RHR shutdown cooling subsystems. Section 1.3, Completion Times, specifies 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 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 shutdown cooling subsystems provide appropriate compensatory measures for separate inoperable shutdown cooling subsystems. As such, a Note has been provided that allows separate Condition entry for each inoperable RHR shutdown cooling subsystem.
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A.1, A.2, and A.3

With one required RHR shutdown cooling subsystem inoperable for decay heat removal, except as permitted by LCO Note 2, the inoperable subsystem must be restored to OPERABLE status without delay. In this condition, the remaining OPERABLE subsystem can provide the necessary decay heat removal. The overall reliability is reduced, however, because a single failure in the OPERABLE subsystem could result in reduced RHR shutdown cooling capability. Therefore, an alternate method of decay heat removal must be provided.

With both RHR shutdown cooling subsystems inoperable, an alternate method of decay heat removal must be provided in addition to that provided for the initial RHR shutdown cooling subsystem inoperability. This re-establishes backup decay heat removal capabilities, similar to the requirements of the LCO. The 1 hour Completion Time is based on the decay heat removal function and the probability of a loss of the available decay heat removal capabilities.

The required cooling capacity of the alternate method should be ensured by verifying (by calculation or demonstration) its capability to maintain or reduce temperature. Decay heat removal by ambient losses can be considered as, or contributing to, the alternate method capability. Alternate methods that can be used include (but are not limited to) the Condensate/Main Steam Systems and the Reactor Water Cleanup System.

(continued)

BASES

ACTIONS	<p><u>A.1, A.2, and A.3</u> (continued)</p> <p>However, due to the potentially reduced reliability of the alternate methods of decay heat removal, it is also required to reduce the reactor coolant temperature to the point where MODE 4 is entered.</p> <p><u>B.1, B.2, and B.3</u></p> <p>With no RHR shutdown cooling subsystem and no recirculation pump in operation, except as permitted by LCO Note 1, reactor coolant circulation by the RHR shutdown cooling subsystem or recirculation pump must be restored without delay.</p> <p>Until RHR or recirculation pump operation is re-established, an alternate method of reactor coolant circulation must be placed into service. This will provide the necessary circulation for monitoring coolant temperature. The 1 hour Completion Time is based on the coolant circulation function and is modified such that the 1 hour is applicable separately for each occurrence involving a loss of coolant circulation. Furthermore, verification of the functioning of the alternate method must be reconfirmed every 12 hours thereafter. This will provide assurance of continued temperature monitoring capability.</p> <p>During the period when the reactor coolant is being circulated by an alternate method (other than by the required RHR shutdown cooling subsystem or recirculation pump), the reactor coolant temperature and pressure must be periodically monitored to ensure proper function of the alternate method. The once per hour Completion Time is deemed appropriate.</p>
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SURVEILLANCE REQUIREMENTS	<p><u>SR 3.4.7.1</u></p> <p>This Surveillance verifies that one RHR shutdown cooling subsystem or recirculation pump is in operation and circulating reactor coolant. The required flow rate is determined by the flow rate necessary to provide sufficient decay heat removal capability. The Frequency of 12 hours is sufficient in view of other visual and audible indications available to the operator for monitoring the RHR subsystem in the control room.</p>
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BASES

**SURVEILLANCE
REQUIREMENTS**

SR 3.4.7.1 (continued)

This Surveillance is modified by a Note allowing sufficient time to align the RHR System for shutdown cooling operation after clearing the pressure interlock that isolates the system, or for placing a recirculation pump in operation. The Note takes exception to the requirements of the Surveillance being met (i.e., forced coolant circulation is not required for this initial 2 hour period), which also allows entry into the Applicability of this Specification in accordance with SR 3.0.4 since the Surveillance will not be "not met" at the time of entry into the Applicability.

REFERENCES

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

LCO (continued) subsystems and ADS must therefore be OPERABLE to satisfy the single failure criterion required by Reference 11. (Reference 10 takes no credit for HPCI.) HPCI must be OPERABLE due to risk consideration.

LPCI subsystems may be considered OPERABLE during alignment and operation for decay heat removal when below the actual RHR low pressure permissive pressure in MODE 3, if capable of being manually realigned (remote or local) to the LPCI mode and not otherwise inoperable. At these low pressures and decay heat levels, a reduced complement of ECCS subsystems should provide the required core cooling, thereby allowing operation of RHR shutdown cooling when necessary.

APPLICABILITY All ECCS subsystems are required to be OPERABLE during MODES 1, 2, and 3, when there is considerable energy in the reactor core and core cooling would be required to prevent fuel damage in the event of a break in the primary system piping. In MODES 2 and 3, when reactor steam dome pressure is ≤ 150 psig, ADS and HPCI are not required to be OPERABLE because the low pressure ECCS subsystems can provide sufficient flow below this pressure. ECCS requirements for MODES 4 and 5 are specified in LCO 3.5.2, "ECCS - Shutdown."

ACTIONS A Note prohibits the application of LCO 3.0.4.b to an inoperable HPCI subsystem. There is an increased risk associated with entering a MODE or other specified condition in the Applicability with an inoperable HPCI subsystem and the provisions of LCO 3.0.4.b, which allows entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, should not be applied in this circumstance.

A.1

If any one low pressure ECCS injection/spray subsystem is inoperable, the inoperable subsystem must be restored to OPERABLE status within 7 days. In this condition, the remaining OPERABLE subsystems provide adequate core cooling during a LOCA. However, overall ECCS reliability is reduced, because a single failure in one of the remaining OPERABLE subsystems, concurrent with a LOCA, may result in the ECCS not being able to perform its intended safety function. The 7 day Completion Time is

(continued)

BASES

ACTIONS	A.1 (continued)
	<p>based on a reliability study (Ref. 12) that evaluated the impact on ECCS availability, assuming various components and subsystems were taken out of service. The results were used to calculate the average availability of ECCS equipment needed to mitigate the consequences of a LOCA as a function of allowed outage times (i.e., Completion Times).</p>

B.1 and B.2

If the inoperable low pressure ECCS subsystem cannot be restored to OPERABLE status within the associated Completion Time, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours and to MODE 4 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

C.1 and C.2

If the HPCI System is inoperable and the RCIC System is verified to be OPERABLE, the HPCI System must be restored to OPERABLE status within 14 days. In this condition, adequate core cooling is ensured by the OPERABILITY of the redundant and diverse low pressure ECCS injection/spray subsystems in conjunction with ADS. Also, the RCIC System will automatically provide makeup water at most reactor operating pressures. Verification of RCIC OPERABILITY within 1 hour is therefore required when HPCI is inoperable. This may be performed as an administrative check by examining logs or other information to determine if RCIC is out of service for maintenance or other reasons. It does not mean to perform the Surveillances needed to demonstrate the OPERABILITY of the RCIC System. If the OPERABILITY of the RCIC System cannot be verified, however, Condition E must be immediately entered. If a single active component fails concurrent with a design basis LOCA, there is a potential, depending on the specific failure, that the minimum required ECCS equipment will not be available. A 14 day Completion Time is based on a reliability study cited in Reference 12 and has been found to be acceptable through operating experience.

(continued)

BASES (continued)

ACTIONS	<u>D.1 and D.2</u>
	<p>If any one low pressure ECCS injection/spray subsystem is inoperable in addition to an inoperable HPCI System, the inoperable low pressure ECCS injection/spray subsystem or the HPCI System must be restored to OPERABLE status within 72 hours. In this condition, adequate core cooling is ensured by the OPERABILITY of the ADS and the remaining low pressure ECCS subsystems. However, the overall ECCS reliability is significantly reduced because a single failure in one of the remaining OPERABLE subsystems concurrent with a design basis LOCA may result in the ECCS not being able to perform its intended safety function. Since both a high pressure system (HPCI) and a low pressure subsystem are inoperable, a more restrictive Completion Time of 72 hours is required to restore either the HPCI System or the low pressure ECCS injection/spray subsystem to OPERABLE status. This Completion Time is based on a reliability study cited in Reference 12 and has been found to be acceptable through operating experience.</p>
	<p><u>E.1 and E.2</u></p> <p>With one ADS valve inoperable, no action is required, because an analysis demonstrated that the remaining six ADS valves are capable of providing the ADS function, per Reference 16.</p>
	<p>If any Required Action and associated Completion Time of Condition C or D is not met, or if two or more ADS valves are inoperable, the plant must be brought to a condition in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours and reactor steam dome pressure reduced to ≤ 150 psig within 36 hours. Entry into MODE 3 is not required if the reduction in reactor steam dome pressure to ≤ 150 psig results in exiting the Applicability for the Condition, and the ≤ 150 psig is achieved within the given 12 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.</p>

F.1

When multiple ECCS subsystems are inoperable, as stated in Condition H, the plant is in a condition outside of the accident analyses. Therefore, LCO 3.0.3 must be entered immediately.

(continued)

BASES (continued)

SURVEILLANCE
REQUIREMENTS

SR 3.5.1.1

The flow path piping has the potential to develop voids and pockets of entrained air. Maintaining the pump discharge lines of the HPCI System, CS System, and LPCI subsystems full of water ensures that the ECCS will perform properly, injecting its full capacity into the RCS upon demand. This will also prevent a water hammer following an ECCS initiation signal. One acceptable method of ensuring that the lines are full is to vent at the high points. In addition, when HPCI is aligned to the suppression pool (instead of the CST), one acceptable method is to monitor pump suction pressure. The 31 day Frequency is based on the gradual nature of void buildup in the ECCS piping, the procedural controls governing system operation, and operating experience.

SR 3.5.1.2

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 initiation signal is allowed to be in a nonaccident position provided the valve will automatically reposition in the proper stroke time. This SR does not require any testing or valve manipulation; rather, it involves verification that those valves capable of potentially being mispositioned are in the correct position. This SR does not apply to valves that cannot be inadvertently misaligned, such as check valves. For the HPCI System, this SR also includes the steam flow path for the turbine and the flow controller position.

The 31 day Frequency of this SR was derived from the Inservice Testing Program requirements for performing valve testing at least once every 92 days. The Frequency of 31 days is further justified because the valves are operated under procedural control and because improper valve position would only affect a single subsystem. This Frequency has been shown to be acceptable through operating experience.

This SR is modified by a Note that allows LPCI subsystems to be considered OPERABLE during alignment and operation for decay heat removal with reactor steam dome pressure less than the RHR low pressure permissive pressure in MODE 3, if capable of being

(continued)

BASES

**SURVEILLANCE
REQUIREMENTS**

SR 3.5.1.2 (continued)

manually realigned (remote or local) to the LPCI mode and not otherwise inoperable. This allows operation in the RHR shutdown cooling mode during MODE 3, if necessary.

SR 3.5.1.3

Verification every 31 days that ADS air supply header pressure is \geq 90 psig ensures adequate air pressure for reliable ADS operation. The accumulator on each ADS valve provides pneumatic pressure for valve actuation. The design pneumatic supply pressure requirements for the accumulator are such that, following a failure of the pneumatic supply to the accumulator, at least two valve actuations can occur with the drywell at 70% of design pressure (Ref. 12). The ECCS safety analysis assumes only one actuation to achieve the depressurization required for operation of the low pressure ECCS. This minimum required pressure of \geq 90 psig for one actuation is provided by the ADS instrument air supply. The 31 day Frequency takes into consideration administrative controls over operation of the air system and alarms for low air pressure.

SR 3.5.1.4

Verification every 31 days that the RHR System cross tie valve is closed and power to its operator is disconnected ensures that each LPCI subsystem remains independent and a failure of the flow path in one subsystem will not affect the flow path of the other LPCI subsystem. Acceptable methods of removing power to the operator include de-energizing breaker control power or racking out or removing the breaker. If the RHR System cross tie valve is open or power has not been removed from the valve operator, both LPCI subsystems must be considered inoperable. The 31 day Frequency has been found acceptable, considering that these valves are under strict administrative controls that will ensure the valves continue to remain closed with either control or motive power removed.

SR 3.5.1.5 (Not used.)

(continued)

BASES

**SURVEILLANCE
REQUIREMENTS
(continued)**

SR 3.5.1.6

Cycling the recirculation pump discharge valves through one complete cycle of full travel demonstrates that the valves are mechanically OPERABLE and will close when required. Upon initiation of an automatic LPCI subsystem injection signal, these valves are required to be closed to ensure full LPCI subsystem flow injection in the reactor via the recirculation jet pumps. De-energizing the valve in the closed position will also ensure the proper flow path for the LPCI subsystem.

Acceptable methods of de-energizing the valve include de-energizing breaker control power, racking out the breaker or removing the breaker.

The specified Frequency is once per 31 days. However, this SR is modified by a Note that states the Surveillance is only required to be performed prior to entering MODE 2 from MODE 3 or 4, when in MODE 4 > 48 hours. Verification during or following MODE 4 > 48 hours and prior to entering MODE 2 from MODE 3 or 4 is an exception to the normal Inservice Testing Program generic valve cycling Frequency of 92 days, but is considered acceptable due to the demonstrated reliability of these valves. The 48 hours is intended to indicate an outage of sufficient duration to allow for scheduling and proper performance of the Surveillance. If the valve is inoperable and in the open position, the associated LPCI subsystem must be declared inoperable.

SR 3.5.1.7, SR 3.5.1.8, and SR 3.5.1.9

The performance requirements of the low pressure ECCS pumps are determined through application of the 10 CFR 50, Appendix K criteria (Ref. 8). This periodic Surveillance is performed (in accordance with the ASME Code, Section XI, requirements for the ECCS pumps) to verify that the ECCS pumps will develop the flow rates required by the respective analyses. The low pressure ECCS pump flow rates ensure that adequate core cooling is provided to satisfy the acceptance criteria of Reference 10. The pump flow rates are verified against a system head equivalent to the RPV pressure expected during a LOCA. The total system pump outlet pressure is adequate to overcome the elevation head pressure between the pump suction and the vessel discharge, the piping friction losses, and RPV pressure present during a LOCA. These values may be established during preoperational testing.

The flow tests for the HPCI System are performed at two different pressure ranges such that system capability to provide rated flow is

(continued)

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.5.1.7, SR 3.5.1.8, and SR 3.5.1.9 (continued)

tested at both the higher and lower operating ranges of the system. The pump flow rates are verified against a system head corresponding to the RPV pressure. The total system pump outlet pressure is adequate to overcome the elevation head pressure between the pump suction and the vessel discharge, the piping friction losses, and RPV pressure. Additionally, adequate steam flow must be passing through the main turbine or turbine bypass valves to continue to control reactor pressure when the HPCI System diverts steam flow. The reactor steam pressure must be ≥ 920 psig to perform SR 3.5.1.8 and ≥ 150 psig to perform SR 3.5.1.9. Adequate steam flow for SR 3.5.1.8 is represented by at least two turbine bypass valves open, or ≥ 200 MWE from the main turbine-generator; and for SR 3.5.1.9 adequate steam flow is represented by at least 1.25 turbine bypass valves open, or total steam flow $\geq 1E6$ lb/hour. Therefore, sufficient time is allowed after adequate pressure and flow are achieved to perform these tests. Reactor startup is allowed prior to performing the low pressure Surveillance test because the reactor pressure is low and the time allowed to satisfactorily perform the Surveillance test is short. The reactor pressure is allowed to be increased to normal operating pressure since it is assumed that the low pressure test has been satisfactorily completed and there is no indication or reason to believe that HPCI is inoperable. Therefore, SR 3.5.1.8 and SR 3.5.1.9 are modified by Notes that state the Surveillances are not required to be performed until 12 hours after the reactor steam pressure and flow are adequate to perform the test. The 12 hours allowed is sufficient to achieve stable conditions for testing and provides a reasonable time to complete the SR.

The Frequency for SR 3.5.1.7 and SR 3.5.1.8 is consistent with the Inservice Testing Program pump testing requirements. The 24 month Frequency for SR 3.5.1.9 is based on the need to perform the Surveillance under the conditions that apply just prior to or during a startup from a plant outage. The 24 month Frequency of SR 3.5.1.9 is based on a review of the surveillance test history and Reference 18.

SR 3.5.1.10

The ECCS subsystems are required to actuate automatically to perform their design functions. This Surveillance verifies that, with a required system initiation signal (actual or simulated), the automatic initiation logic of HPCI, CS, and LPCI will cause the systems or subsystems to operate as designed, including actuation of the system

(continued)

SURVEILLANCE
REQUIREMENTS

SR 3.5.1.10 (continued)

throughout its emergency operating sequence, automatic pump startup and actuation of all automatic valves to their required positions. This SR also ensures that the HPCI System will automatically restart on an RPV low water level (Level 2) signal received subsequent to an RPV high water level (Level 8) trip and that the suction is automatically transferred from the CST to the suppression pool. The LOGIC SYSTEM FUNCTIONAL TEST performed in LCO 3.3.5.1 overlaps this Surveillance to provide complete testing of the assumed safety function.

The 24 month Frequency is based on the need to perform the 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. The 24 month Frequency is based on a review of the surveillance test history and Reference 18.

This SR is modified by a Note that excludes vessel injection/spray during the Surveillance. Since all active components are testable and full flow can be demonstrated by recirculation through the test line, coolant injection into the RPV is not required during the Surveillance.

SR 3.5.1.11

The ADS designated S/RVs are required to actuate automatically upon receipt of specific initiation signals. A system functional test is performed to demonstrate that the mechanical portions of the ADS function (i.e., solenoids) operate as designed when initiated either by an actual or simulated initiation signal, causing proper actuation of all the required components. SR 3.5.1.12 and the LOGIC SYSTEM FUNCTIONAL TEST performed in LCO 3.3.5.1 overlap this Surveillance to provide complete testing of the assumed safety function.

The 24 month Frequency is based on the need to perform the 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. The 24 month Frequency is based on a review of the surveillance test history and Reference 18.

This SR is modified by a Note that excludes valve actuation. This prevents an RPV pressure blowdown.

(continued)

BASES

BACKGROUND (continued)	when other discharge line valves are closed. To ensure rapid delivery of water to the RPV and to minimize water hammer effects, the RCIC System discharge piping is kept full of water. The RCIC System is normally aligned to the CST. The height of water in the CST is sufficient to maintain the piping full of water up to the first isolation valve. The relative height of the feedwater line connection for RCIC is such that the water in the feedwater lines keeps the remaining portion of the RCIC discharge line full of water. Therefore, RCIC does not require a "keep fill" system.
APPLICABLE SAFETY ANALYSES	The function of the RCIC System is to respond to transient events by providing makeup coolant to the reactor. The RCIC System is not an Engineered Safety Feature System and no credit is taken in the safety analyses for RCIC System operation. Based on its contribution to the reduction of overall plant risk, however, the system satisfies Criterion 4 of the NRC Policy Statement (Ref. 5).
LCO	The OPERABILITY of the RCIC System provides adequate core cooling such that actuation of any of the low pressure ECCS subsystems is not required in the event of RPV isolation accompanied by a loss of feedwater flow. The RCIC System has sufficient capacity for maintaining RPV inventory during an isolation event.
APPLICABILITY	The RCIC System is required to be OPERABLE during MODE 1, and MODES 2 and 3 with reactor steam dome pressure > 150 psig, since RCIC is the primary non-ECCS water source for core cooling when the reactor is isolated and pressurized. In MODES 2 and 3 with reactor steam dome pressure ≤ 150 psig, and in MODES 4 and 5, RCIC is not required to be OPERABLE since the low pressure ECCS injection/spray subsystems can provide sufficient flow to the RPV.
ACTIONS	A Note prohibits the application of LCO 3.0.4.b to an inoperable RCIC subsystem. There is an increased risk associated with entering a MODE or other specified condition in the Applicability with an inoperable RCIC subsystem, and the provisions of LCO 3.0.4.b, which allows entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, should not be applied in this circumstance.

(continued)

BASES

ACTIONS

A.1 and A.2

If the RCIC System is inoperable during MODE 1, or MODE 2 or 3 with reactor steam dome pressure > 150 psig, and the HPCI System is verified to be OPERABLE, the RCIC System must be restored to OPERABLE status within 14 days. In this condition, loss of the RCIC System will not affect the overall plant capability to provide makeup inventory at high reactor pressure since the HPCI System is the only high pressure system assumed to function during a loss of coolant accident (LOCA). OPERABILITY of HPCI is therefore verified within 1 hour when the RCIC System is inoperable. This may be performed as an administrative check, by examining logs or other information, to determine if HPCI is out of service for maintenance or other reasons. It does not mean it is necessary to perform the Surveillances needed to demonstrate the OPERABILITY of the HPCI System. If the OPERABILITY of the HPCI System cannot be verified, however, Condition B must be immediately entered. For non-LOCA events, RCIC (as opposed to HPCI) is the preferred source of makeup coolant because of its relatively small capacity, which allows easier control of the RPV water level. Therefore, a limited time is allowed to restore the inoperable RCIC to OPERABLE status.

The 14 day Completion Time is based on a reliability study (Ref. 3) that evaluated the impact on ECCS availability, assuming various components and subsystems were taken out of service. The results were used to calculate the average availability of ECCS equipment needed to mitigate the consequences of a LOCA as a function of allowed outage times (AOTs). Because of similar functions of HPCI and RCIC, the AOTs (i.e., Completion Times) determined for HPCI are also applied to RCIC.

B.1 and B.2

If the RCIC System cannot be restored to OPERABLE status within the associated Completion Time, or if the HPCI System is simultaneously inoperable, the plant must be brought to a condition in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours and reactor steam dome pressure reduced to ≤ 150 psig within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

(continued)

BASES (continued)

**SURVEILLANCE
REQUIREMENTS**

SR 3.5.3.1

The flow path piping has the potential to develop voids and pockets of entrained air. Maintaining the pump discharge line of the RCIC System full of water ensures that the system will perform properly, injecting its full capacity into the Reactor Coolant System upon demand. This will also prevent a water hammer following an initiation signal. One acceptable method of ensuring the line is full when aligned to the CST is to vent at the high points and, when aligned to the suppression pool, by monitoring pump suction pressure. The 31 day Frequency is based on the gradual nature of void buildup in the RCIC piping, the procedural controls governing system operation, and operating experience.

SR 3.5.3.2

Verifying the correct alignment for manual, power operated, and automatic valves in the RCIC flow path provides assurance that the proper flow path will exist for RCIC operation. 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. A valve that receives an initiation signal is allowed to be in a nonaccident position provided the valve will automatically reposition in the proper stroke time. This SR does not require any testing or valve manipulation; rather, it involves verification that those valves capable of potentially being mispositioned are in the correct position. This SR does not apply to valves that cannot be inadvertently misaligned, such as check valves. For the RCIC System, this SR also includes the steam flow path for the turbine and the flow controller position.

The 31 day Frequency of this SR was derived from the Inservice Testing Program requirements for performing valve testing at least once every 92 days. The Frequency of 31 days is further justified because the valves are operated under procedural control and because improper valve position would affect only the RCIC System. This Frequency has been shown to be acceptable through operating experience.

SR 3.5.3.3 and SR 3.5.3.4

The RCIC pump flow rates ensure that the system can maintain reactor coolant inventory during pressurized conditions with the RPV

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.5.3.3 and SR 3.5.3.4 (continued)

isolated. The required flow rate (400 gpm) is the pump design flow rate. Analysis has demonstrated that RCIC can fulfill its design function at a system flow rate of 360 gpm (Ref. 4). The pump flow rates are verified against a system head equivalent to the RPV pressure. The total system pump outlet pressure is adequate to overcome the elevation head pressure between the pump suction and the vessel discharge, the piping friction losses, and RPV pressure. The flow tests for the RCIC System are performed at two different pressure ranges such that system capability to provide rated flow is tested both at the higher and lower operating ranges of the system. Additionally, adequate steam flow must be passing through the main turbine or turbine bypass valves to continue to control reactor pressure when the RCIC System diverts steam flow. Reactor steam pressure must be \geq 920 psig to perform SR 3.5.3.3 and \geq 150 psig to perform SR 3.5.3.4. Adequate steam flow is represented by at least one turbine bypass valve open, or for SR 3.5.3.3 \geq 200 MWE from the main turbine-generator and for SR 3.5.3.4 total steam flow \geq 1E6 lb/hour. Therefore, sufficient time is allowed after adequate pressure and flow are achieved to perform these SRs. Reactor startup is allowed prior to performing the low pressure Surveillance because the reactor pressure is low and the time allowed to satisfactorily perform the Surveillance is short. The reactor pressure is allowed to be increased to normal operating pressure since it is assumed that the low pressure Surveillance has been satisfactorily completed and there is no indication or reason to believe that RCIC is inoperable. Therefore, these SRs are modified by Notes that state the Surveillances are not required to be performed until 12 hours after the reactor steam pressure and flow are adequate to perform the test. The 12 hours allowed is sufficient to achieve stable conditions for testing and provides a reasonable time to complete the SR. A 92 day Frequency for SR 3.5.3.3 is consistent with the Inservice Testing Program requirements. The 24 month Frequency for SR 3.5.3.4 is based on the need to perform the Surveillance under conditions that apply just prior to or during a startup from a plant outage. The 24 month Frequency of SR 3.5.3.4 is based on a review of the surveillance test history and Reference 6.

SR 3.5.3.5

The RCIC System is required to actuate automatically in order to verify its design function satisfactorily. This Surveillance verifies that, with a required system initiation signal (actual or simulated), the automatic initiation logic of the RCIC System will cause the system to operate as designed, including actuation of the system throughout its

(continued)

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.5.3.5 (continued)

emergency operating sequence; that is, automatic pump startup and actuation of all automatic valves to their required positions. This test also ensures the RCIC System will automatically restart on an RPV low water level (Level 2) signal received subsequent to an RPV high water level (Level 8) trip and that the suction is automatically transferred from the CST to the suppression pool. The LOGIC SYSTEM FUNCTIONAL TEST performed in LCO 3.3.5.2 overlaps this Surveillance to provide complete testing of the assumed safety function.

The 24 month Frequency is based on the need to perform the 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. The 24 month Frequency is based on a review of the surveillance test history and Reference 6.

This SR is modified by a Note that excludes vessel injection during the Surveillance. Since all active components are testable and full flow can be demonstrated by recirculation through the test line, coolant injection into the RPV is not required during the Surveillance.

REFERENCES

1. 10 CFR 50, Appendix A, GDC 33.
2. FSAR, Section 5.5.6.
3. Memorandum from R.L. Baer (NRC) to V. Stello, Jr. (NRC), "Recommended Interim Revisions to LCOs for ECCS Components," December 1, 1975.
4. GE Report AES-41-0688, "Safety Evaluation for Relaxation of RCIC Performance Requirements for Plant Hatch Units 1 and 2," July 1988.
5. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.
6. NRC Safety Evaluation Report for Amendment 174.

BASES

ACTIONS
(continued)

B.1

With two Drywell Cooling System fans inoperable, one fan must be restored to OPERABLE status within 7 days. Seven days is a reasonable time to allow two Drywell Cooling System fans to be inoperable because the hydrogen mixing function is maintained via natural circulation and because of the low probability of the occurrence of a LOCA that would generate hydrogen in amounts capable of exceeding the flammability limit.

C.1

If any Required Action and associated Completion Time cannot be met, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours. The allowed Completion Time of 12 hours is reasonable, based on operating experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE REQUIREMENTS

SR 3.6.3.3.1

Operating each required Drywell Cooling System fan for \geq 15 minutes ensures that each subsystem is OPERABLE and that all associated controls are functioning properly. It also ensures that blockage, fan or motor failure, or excessive vibration can be detected for corrective action.

The 92 day Frequency is consistent with the Inservice Testing Program Frequencies, operating experience, the known reliability of the fan motors and controls, and the two redundant fans available.

(continued)

BASES (continued)

REFERENCES

1. Regulatory Guide 1.7, Revision 0.
 2. FSAR, Section 6.2.5.
 3. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.
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BASES

ACTIONS	<u>A.1</u> (continued)
	capability, including enhanced reliability afforded by manual cross connect capability, and the low probability of a DBA with concurrent worst case single failure.
	<u>B.1</u> With one RHRSW pump inoperable in each subsystem, if no additional failures occur in the RHRSW System, and the two OPERABLE pumps are aligned by opening the normally closed cross tie valves (i.e., after an event requiring operation of the RHRSW System), then the remaining OPERABLE pumps and flow paths provide adequate heat removal capacity following a design basis LOCA. However, capability for this alignment is not assumed in long term containment response analysis and an additional single failure in the RHRSW System could reduce the system capacity below that assumed in the safety analysis. Therefore, continued operation is permitted only for a limited time. One inoperable pump is required to be restored to OPERABLE status within 7 days. The 7 day Completion Time for restoring one inoperable RHRSW pump to OPERABLE status is based on engineering judgment, considering the level of redundancy provided.
	<u>C.1</u> Required Action C.1 is intended to handle the inoperability of one RHRSW subsystem for reasons other than Condition A. The Completion Time of 7 days is allowed to restore the RHRSW subsystem to OPERABLE status. With the unit in this condition, the remaining OPERABLE RHRSW subsystem is adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure in the OPERABLE RHRSW subsystem could result in loss of RHRSW function. The Completion Time is based on the redundant RHRSW capabilities afforded by the OPERABLE subsystem and the low probability of an event occurring requiring RHRSW during this period.

(continued)

BASES

APPLICABILITY
(continued) In MODES 4 and 5, and defueled the OPERABILITY requirements of the PSW System and UHS are determined by the systems they support and therefore, the requirements are not the same for all facets of operation in MODES 4 and 5 and defueled. Thus, the LCOs of the individual systems, which require portions of the PSW System and the UHS to be OPERABLE, will govern PSW System and UHS requirements during operation in MODES 4 and 5 and defueled.

ACTIONS A.1

With one PSW pump inoperable, the inoperable pump must be restored to OPERABLE status within 30 days. With the unit in this condition, the remaining OPERABLE PSW pumps (even allowing for an additional single failure) are adequate to perform the PSW heat removal function; however, the overall reliability is reduced. The 30 day Completion Time is based on the remaining PSW heat removal capability to accommodate additional single failures, and the low probability of an event occurring during this time period.

 |
B.1

With one PSW turbine building isolation valve inoperable, the inoperable valve must be restored to OPERABLE status within 30 days. With the unit in this condition, the remaining OPERABLE PSW turbine building isolation valve in the subsystem is adequate to isolate the non-essential loads, and, even allowing for an additional single failure, the other PSW subsystem is adequate to perform the PSW heat removal function; however, the overall reliability is reduced. The 30 day Completion Time is based on the remaining PSW heat removal capability to accommodate additional single failures, and the low probability of an event occurring during this time period.

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(continued)

BASES

ACTIONS
(continued)

C.1

With one PSW pump inoperable in each subsystem, one inoperable pump must be restored to OPERABLE status within 7 days. With the unit in this condition, the remaining OPERABLE PSW pumps are adequate to perform the PSW heat removal function; however, the overall reliability is reduced. The 7 day Completion Time is based on the remaining PSW heat removal capability to accommodate an additional single failure and the low probability of an event occurring during this time period.

D.1

With one PSW turbine building isolation valve inoperable in each subsystem, one inoperable valve must be restored to OPERABLE status within 72 hours. With the unit in this condition, the remaining OPERABLE PSW valves are adequate to perform the PSW non-essential load isolation function; however, the overall reliability is reduced. The 72 hour Completion Time is based on the remaining PSW heat removal capability to accommodate an additional single failure and the low probability of an event occurring during this time period.

E.1

With one PSW subsystem inoperable for reasons other than Condition A and Condition B (e.g., inoperable flow path, both pumps inoperable in a loop, or both turbine building isolation valves inoperable in a loop), the PSW subsystem must be restored to OPERABLE status within 72 hours. With the unit in this condition, the remaining OPERABLE PSW subsystem is adequate to perform the

(continued)

BASES

LCO (continued)	<p>capabilities must be demonstrated to meet required Surveillances, e.g., capability of the DG to revert to standby status on an ECCS signal while operating in parallel test mode.</p> <p>Proper sequencing of loads, including tripping of nonessential loads, is a required function for DG OPERABILITY.</p> <p>The AC sources must be separate and independent (to the extent possible) (Ref. 1) of other AC sources. For the DGs, the separation and independence are complete. For the offsite AC sources, the separation and independence are to the extent practical. A circuit may be connected to more than one ESF bus, with automatic transfer capability to the other circuit OPERABLE, and not violate separation criteria. A circuit that is not connected to an ESF bus is required to have OPERABLE automatic transfer capability to at least two ESF buses (one of which must be to the 2F bus) to support OPERABILITY of that circuit.</p>
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APPLICABILITY	<p>The AC sources are required to be OPERABLE in MODES 1, 2, and 3 to ensure that:</p> <ol style="list-style-type: none">Acceptable fuel design limits and reactor coolant pressure boundary limits are not exceeded as a result of AOOs or abnormal transients; andAdequate core cooling is provided and containment OPERABILITY and other vital functions are maintained in the event of a postulated DBA. <p>The AC power requirements for MODES 4 and 5 and other conditions in which AC Sources are required, are covered in LCO 3.8.2, "AC Sources - Shutdown."</p>
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ACTIONS	<p>A Note prohibits the application of LCO 3.0.4.b to an inoperable DG. There is an increased risk associated with entering a MODE or other specified condition in the Applicability with an inoperable DG and the provisions of LCO 3.0.4.b, which allows entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, should not be applied in this circumstance.</p>
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A.1

To ensure a highly reliable power source remains with one offsite circuit inoperable, it is necessary to verify the availability of the remaining required offsite circuits on a more frequent basis. Since the

(continued)

BASES

ACTIONS

A.1 (continued)

Required Action only specifies "perform," a failure of SR 3.8.1.1 acceptance criteria does not result in a Required Action not met. However, if a second required circuit fails SR 3.8.1.1, the second offsite circuit is inoperable, and Condition D, for two offsite circuits inoperable, is entered.

A.2

Required Action A.2, which only applies if a 4160 V ESF bus cannot be powered from an offsite source, is intended to provide assurance that an event with a coincident single failure of the associated DG does not result in a complete loss of safety function of critical systems. These features are designed with redundant safety related divisions (i.e., single division systems are not included). Redundant required features failures consist of inoperable features associated with a division redundant to the division that has no offsite power.

The Completion Time for Required Action A.2 is intended to allow time for the operator to evaluate and repair any discovered inoperabilities. This Completion Time also allows an exception to the normal "time zero" for beginning the allowed outage time "clock." In this Required Action the Completion Time only begins on discovery that both:

- a. The 4160 V ESF bus has no offsite power supplying its loads; and
- b. A redundant required feature on the other division is inoperable.

If, at any time during the existence of this Condition (one offsite circuit inoperable) a redundant required feature subsequently becomes inoperable, this Completion Time would begin to be tracked.

Discovering no offsite power to one 4160 V ESF bus of the onsite Class 1E Power Distribution System coincident with one or more inoperable redundant required support or supported features, or both, that are associated with any other ESF bus that has offsite power, results in starting the Completion Times for the Required Action. Twenty-four hours is acceptable because it minimizes risk while allowing time for restoration before the unit is subjected to transients associated with shutdown.

(continued)

BASES

ACTIONS

A.2 (continued)

The remaining OPERABLE offsite circuits and DGs are adequate to supply electrical power to the onsite Class 1E Distribution System. Thus, on a component basis, single failure protection may have been lost for the required feature's function; however, function is not lost. The 24 hour Completion Time takes into account the component OPERABILITY of the redundant counterpart to the inoperable required feature. Additionally, the 24 hour Completion Time takes into account the capacity and capability of the remaining AC sources, a reasonable time for repairs, and the low probability of a DBA occurring during this period.

A.3

According to Regulatory Guide 1.93 (Ref. 6), operation may continue in Condition A for a period that should not exceed 72 hours. With one required offsite circuit inoperable, the reliability of the offsite system is degraded, and the potential for a loss of offsite power is increased, with attendant potential for a challenge to the plant safety systems. In this condition, however, the remaining OPERABLE offsite circuit and DGs are adequate to supply electrical power to the onsite Class 1E Distribution System.

The 72 hour Completion Time takes into account the capacity and capability of the remaining AC sources, reasonable time for repairs, and the low probability of a DBA occurring during this period.

The second Completion Time for Required Action A.3 establishes a limit on the maximum time allowed for any combination of required AC power sources to be inoperable during any single contiguous occurrence of failing to meet LCO 3.8.1.a, b, or c. If Condition A is entered while, for instance, the swing DG is inoperable, and that DG is subsequently returned OPERABLE, LCO 3.8.1.a, b, or c may already have been not met for up to 14 days. This situation could lead to a total of 17 days, since initial failure to meet LCO 3.8.1.a, b, and c, to restore the offsite circuit. At this time, the swing DG could again become inoperable, the circuit restored OPERABLE, and an additional 14 days (for a total of 31 days) allowed prior to complete restoration of LCO 3.8.1.a, b, and c. The 17 day Completion Time provides a limit on the time allowed in a specified condition after discovery of failure to meet LCO 3.8.1.a, b, or c. This limit is considered reasonable for situations in which Conditions A and B are entered concurrently. The "AND" connector between the 72 hours and 17 day Completion Times means that both Completion Times apply simultaneously, and the more restrictive Completion Time must be met.

(continued)

BASES

ACTIONS

A.3 (continued)

As in Required Action A.2, the Completion Time allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." This exception results in establishing the "time zero" at the time LCO 3.8.1.a, b, or c was initially not met, instead of at the time that Condition A was entered.

B.1

To ensure a highly reliable power source remains with one Unit 2 or the swing DG inoperable, it is necessary to verify the availability of the required offsite circuits on a more frequent basis. Since the Required Action only specifies "perform," a failure of SR 3.8.1.1 acceptance criteria does not result in a Required Action being not met. However, if a circuit fails to pass SR 3.8.1.1, it is inoperable. Upon offsite circuit inoperability, additional Conditions must then be entered.

B.2

Required Action B.2 is intended to provide assurance that a loss of offsite power, during the period that a Unit 2 or swing DG is inoperable, does not result in a complete loss of safety function of critical systems. These features are designed with redundant safety related divisions (i.e., single division systems are not included). Redundant required features failures consist of inoperable features associated with a division redundant to the division that has an inoperable DG.

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." In this Required Action the Completion Time only begins on discovery that both:

- a. An inoperable Unit 2 or swing DG exists; and
- b. A redundant required feature on the other division (Division 1 or 2), or divisions in the case of the Unit 1 and 2 Standby Gas Treatment (SGT) System, is inoperable.

If, at any time during the existence of this Condition (one Unit 2 or swing DG inoperable), a redundant required feature subsequently becomes inoperable, this Completion Time begins to be tracked.

(continued)

BASES

ACTIONS	<u>B.2</u> (continued)
	<p>Discovering one required DG inoperable coincident with one or more inoperable redundant required support or supported features, or both, that are associated with the OPERABLE DGs results in starting the Completion Time for the Required Action. Four hours from the discovery of these events existing concurrently is acceptable because it minimizes risk while allowing time for restoration before subjecting the unit to transients associated with shutdown.</p> <p>The remaining OPERABLE DGs and offsite circuits are adequate to supply electrical power to the onsite Class 1E Distribution System.</p> <p>Thus, on a component basis, single failure protection for the required feature's function may have been lost; however, function has not been lost. The 4 hour Completion Time takes into account the component OPERABILITY of the redundant counterpart to the inoperable required feature. Additionally, the 4 hour Completion Time takes into account the capacity and capability of the remaining AC sources, reasonable time for repairs, and low probability of a DBA occurring during this period.</p>
	<p><u>B.3.1 and B.3.2</u></p> <p>Required Action B.3.1 provides an allowance to avoid unnecessary testing of OPERABLE DGs. If it can be determined that the cause of the inoperable DG does not exist on the OPERABLE DG(s), SR 3.8.1.2.a does not have to be performed. If the cause of inoperability exists on other DG(s), they are declared inoperable upon discovery, and Condition F of LCO 3.8.1 is entered. Once the failure is repaired, and the common cause failure no longer exists, Required Action B.3.1 is satisfied. If the cause of the initial inoperable DG cannot be confirmed not to exist on the remaining DG(s), performance of SR 3.8.1.2.a suffices to provide assurance of continued OPERABILITY of those DGs. In the event the inoperable DG is restored to OPERABLE status prior to completing either B.3.1 or B.3.2, the deficiency control program, as appropriate, will continue to evaluate the common cause possibility. This continued evaluation, however, is no longer under the 24 hour constraint imposed while in Condition B.</p> <p>According to Generic Letter 84-15 (Ref. 7), 24 hours is a reasonable time to confirm that the OPERABLE DGs are not affected by the same problem as the inoperable DG.</p>

(continued)

BASES

ACTIONS
(continued)

B.4

Regulatory Guide 1.93 (Ref. 6), provides guidance that operation in Condition B may continue for 72 hours. A risk-informed, deterministic evaluation performed for Plant Hatch justifies operation in Condition B for 14 days, provided action is taken to ensure two DGs are dedicated to each Hatch unit. This is accomplished for an inoperable A or C DG by inhibiting the automatic alignment (on a LOCA or LOSP signal) of the swing DG to the other unit. If the inoperable DG is the swing DG, each unit has two dedicated DGs. For an inoperable swing DG, a 72 hour Completion Time applies unless the restrictions specified following this paragraph are satisfied. In Condition B for each defined Completion Time and restriction (if applicable), the remaining OPERABLE DGs and offsite circuits are adequate to supply electrical power to the onsite Unit 2 Class 1E Distribution System. The Completion Times take into account the capacity and capability of the remaining AC sources, reasonable time for maintenance, and low probability of a DBA occurring during this period. Use of the 14 day Completion Time subject to additional restrictions controlled by 90AC-OAM-002-0 is permitted as follows:

- For the Unit 2 DGs:

Once per DG per operating cycle for performing major overhaul of a DG.

As needed to complete unplanned maintenance. This time shall be minimized.

- For the swing DG:

The additional restrictions apply prior to using a Completion Time of greater than 72 hours.

The 14 day Completion Time may be used once per Unit 1 operating cycle for performing a major overhaul of the swing DG.

The time may be used as needed to complete unplanned maintenance. This time shall be minimized.

- As needed for the swing DG when it is inhibited from automatically aligning to Unit 2 in order for the 14 day Completion Time to be used for a Unit 1 DG.

(continued)

BASES

ACTIONS

B.4 (continued)

The "AND" connector between the 72 hour and 14 day Completion Times means that both Completion Times apply simultaneously. That is, the 14 day Completion Time for an A or C DG with the swing DG inhibited applies from the time of entry into Condition B, not from the time the swing DG is inhibited.

The fourth Completion Time for Required Action B.4 establishes a limit on the maximum time allowed for any combination of required AC power sources to be inoperable during any single contiguous occurrence of failing to meet LCO 3.8.1.a, b, or c. If Condition B is entered while, for instance, an offsite circuit is inoperable and that circuit is subsequently restored OPERABLE, LCO 3.8.1.a, b, or c may already have been not met for up to 72 hours. This situation could lead to a total of 17 days, since initial failure to meet LCO 3.8.1.a, b, and c, to restore the DG. At this time, an offsite circuit could again become inoperable, the DG restored OPERABLE, and an additional 72 hours (for a total of 20 days) allowed prior to complete restoration of LCO 3.8.1.a, b, and c. The 17 day Completion Time provides a limit on the time allowed in a specified condition after discovery of failure to meet LCO 3.8.1.a, b, or c. This limit is considered reasonable for situations in which Conditions A and B are entered concurrently. The "AND" connectors between the Completion Times mean that all Completion Times apply simultaneously, and the more restrictive must be met.

As in Required Action B.2, the Completion Time allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." This exception results in establishing the "time zero" at the time that LCO 3.8.1.a, b, or c was initially not met, instead of the time that Condition B was entered.

C.1

To ensure a highly reliable power source remains with one required Unit 1 DG inoperable, it is necessary to verify the availability of the required offsite circuits on a more frequent basis. Since the Required Action only specifies "perform," a failure of SR 3.8.1.1 acceptance criteria does not result in a Required Action being not met. However, if a circuit fails to pass SR 3.8.1.1, it is inoperable. Upon offsite circuit inoperability, additional Conditions must then be entered.

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BASES

ACTIONS
(continued)

C.2

Required Action C.2 is intended to provide assurance that a loss of offsite power, during the period that one required Unit 1 DG is inoperable, does not result in a complete loss of safety function of critical systems. These features are designed with redundant safety related divisions (i.e., single division systems are not included). Redundant required features failures consist of inoperable features associated with a division redundant to the division that has an inoperable DG.

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." In this Required Action the Completion Time only begins on discovery that both:

- a. An inoperable required Unit 1 DG exists; and
- b. A redundant required feature on the other division (Division 1 or 2), or divisions in the case of the Unit 1 and 2 SGT System, is inoperable.

If, at any time during the existence of this Condition (required Unit 1 DG inoperable), a redundant feature subsequently becomes inoperable, this Completion Time begins to be tracked.

Discovering one required Unit 1 DG inoperable coincident with one or more inoperable redundant required support or supported features, or both, that are associated with the OPERABLE DGs results in starting the Completion Time for the Required Action. Four hours from the discovery of these events existing concurrently is acceptable because it minimizes risk while allowing time for restoration before subjecting the unit to transients associated with shutdown.

The remaining OPERABLE DGs and offsite circuits are adequate to supply electrical power to the onsite Class 1E Distribution System. Thus, on a component basis, single failure protection for the required feature's function may have been lost; however, function has not been lost. The 4 hour Completion Time takes into account the component OPERABILITY of the redundant counterpart to the inoperable required feature. Additionally, the 4 hour Completion Time takes into account the capacity and capability of the remaining AC sources, reasonable time for repairs, and low probability of a DBA occurring during this period.

(continued)

BASES

ACTIONS
(continued)

C.3.1 and C.3.2

Required Action C.3.1 provides an allowance to avoid unnecessary testing of OPERABLE DGs. If it can be determined that the cause of the inoperable DG does not exist on the OPERABLE DG, SR 3.8.1.2.a does not have to be performed. If the cause of inoperability exists on other DG(s), they are declared inoperable upon discovery, and Condition F of LCO 3.8.1 is entered. Once the failure is repaired, and the common cause failure no longer exists, Required Action C.3.1 is satisfied. If the cause of the initial inoperable DG cannot be confirmed not to exist on the remaining DG(s), performance of SR 3.8.1.2.a suffices to provide assurance of continued OPERABILITY of those DGs. In the event the inoperable DG is restored to OPERABLE status prior to completing either C.3.1 or C.3.2, the deficiency control program, as appropriate, will continue to evaluate the common cause possibility. This continued evaluation, however, is no longer under the 24 hour constraint imposed while in Condition C.

According to Generic Letter 84-15 (Ref. 7), 24 hours is a reasonable time to confirm that the OPERABLE DGs are not affected by the same problem as the inoperable DG.

C.4

In Condition C, the remaining OPERABLE offsite circuit is adequate to supply electrical power to the required onsite Unit 1 Class 1E Distribution System. The 7 day Completion Time is based on the shortest restoration time allowed for the systems affected by the inoperable DG in the individual system LCOs. A risk-informed, deterministic evaluation performed for Plant Hatch justifies operation in Condition C for 14 days, provided action is taken to ensure two DGs are dedicated to each Hatch unit. This is accomplished for an inoperable A or C DG by inhibiting the automatic alignment (on a LOCA or LOSP signal) of the swing DG to the other unit. The Completion Times take into account the capacity and capability of the remaining AC sources, reasonable time for maintenance, and low probability of a DBA occurring during this period. Use of the 14 day Completion Time, subject to additional restrictions controlled by 90AC-OAM-002-0, is permitted as follows:

- Once per DG per operating cycle for performing a major overhaul of a DG.
- As needed to complete unplanned maintenance. This time shall be minimized.

(continued)

BASES

ACTIONS
(continued)

D.1 and D.2

Required Action D.1 addresses actions to be taken in the event of inoperability of redundant required features concurrent with inoperability of two or more required offsite circuits. Required Action D.1 reduces the vulnerability to a loss of function. The Completion Time for taking these actions is reduced to 12 hours from that allowed with one 4160 V ESF bus without offsite power (Required Action A.2). The rationale for the reduction to 12 hours is that Regulatory Guide 1.93 (Ref. 6) allows a Completion Time of 24 hours for two required offsite circuits inoperable, based upon the assumption that two complete safety divisions are OPERABLE. (While this ACTION allows more than two circuits to be inoperable, Regulatory Guide 1.93 assumed two circuits were all that were required by the LCO, and a loss of those two circuits resulted in a loss of all offsite power to the Class 1E AC Electrical Power Distribution System. Thus, with the Plant Hatch design, a loss of more than two required offsite circuits results in the same conditions assumed in Regulatory Guide 1.93.) When a concurrent redundant required feature failure exists, this assumption is not the case, and a shorter Completion Time of 12 hours is appropriate. These features are designed with redundant safety related divisions, (i.e., single division systems are not included in the list). Redundant required features failures consist of any of these features that are inoperable because any inoperability is on a division redundant to a division with inoperable offsite circuits.

The Completion Time for Required Action D.1 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." In this Required Action, the Completion Time only begins on discovery that both:

- a. All required offsite circuits are inoperable; and
- b. A redundant required feature is inoperable.

If, at any time during the existence of this Condition (two or more required offsite circuits inoperable), a redundant required feature subsequently becomes inoperable, this Completion Time begins to be tracked.

According to Regulatory Guide 1.93 (Ref. 6), operation may continue in Condition D for a period that should not exceed 24 hours. This level of degradation means that the offsite electrical power system does not have the capability to effect a safe shutdown and to mitigate the effects of an accident; however, the onsite AC sources have not been degraded. This level of degradation generally corresponds to a total loss of the immediately accessible offsite power sources.

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