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U.S. Nuclear Regulatory Commission
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Subject: Response to Non-cited Violation in IR 50-458/2005-005
River Bend Station - Unit License No. NPF-47 Docket No. 50-458

File Nos.: G9.5, G15.4.1
RBG-46550
RBF1-06-0062

Ladies and Gentlemen:

Entergy Operations, Inc. (EOI) River Bend Station (RBS) is providing a response on March 24, 2006, as discussed with Mr. Wayne Walker of your staff. The response addresses a Green Non-cited Violation in Inspection Report 50-458/2005-005 pursuant to the provisions of 10 CFR 2.201. Specifically, the Non-cited Violation concerned River Bend Station's implementation of Technical Specification (TS) Limiting Condition for Operation (LCO) 3.4.1.A, Condition 'A', Required Action A.1. The inspection report concluded that a Green Non-cited Violation of TS Action 3.4.1.A.1 occurred when the station failed to restore compliance with LCO 3.4.1 or shutdown one Reactor Recirculation Loop within 2 hours of determining that Reactor Recirculation Loop Flow mismatch was greater than 5% at power with greater than 70% rated core flow. Entergy's position is that no violation existed.

The NRC Enforcement Manual and previous enforcement precedence concludes that, no violation exists unless all actions are not completed within all applicable completion times. In this instance, RBS met the LCO requirements prior to the Required Completion time of Action 'D'. Therefore, Entergy respectfully requests that the NRC reconsider their conclusion and find that no violation of TS 3.4.1 occurred.

J.E.O.I

Entergy agrees that the operators had an alternative to restore recirculation flow mismatch or shutdown a recirculation loop to satisfy TS 3.4.1.A, Condition 'A', Required Action A.1; however, Entergy does not believe this was the most prudent course of action allowed by the RBS Technical Specifications. Operators are trained to not make decisions in haste that may lead to non-conservative actions. In their initial response to the event, the operating crew was concerned about the current plant conditions and was focused on stabilizing the plant and minimizing the impact to the reactor and its systems.

The operators believed, with a high level of confidence, that the cause of the mismatch would be quickly identified and corrected. This high level of confidence was reasonable because bumping of the Flow Control Valve 'B' conduit was coincident with the initiation of the flow mismatch. Couple this information with the fact that a blown fuse was identified, logically supported that the condition could be fixed within the available 14 hours¹ allowed by TS.

In lieu of removing a Reactor Recirculation Loop from operation, the operating crew chose instead to pursue placing the unit in Mode 3. When this decision was made, actions were initiated to prepare for the safe shutdown of the unit in accordance with LCO 3.4.1.A, Condition 'D', Required Action D.1. This course of action is judged to be less risk to overall plant safety than the transient associated with removing a Reactor Recirculation Loop from operation. Therefore, it was the judgment of the operators that minimizing the amount of time that the station was operated in an off-normal condition (less than normal two recirculation loop operation), would minimize risk.

Entergy's central concern is ensuring a consistent approach to implementing Technical Specification Action Statements. If this non-cited violation's concepts were generically applied to other Technical Specifications, it would result in limiting the appropriate use of prudent operator judgment and conservative decision making imbedded in the basis and mechanics of Technical Specifications; thereby changing previously accepted practices and principles used to comply with Technical Specifications.

A more detailed discussion of the basis for Entergy's conclusion that no violation should be assessed is provided in Attachment 1. Attachments 2 and 3 are provided as a reference.

¹ TS LCO 3.4.1.A Condition 'A', Required Action A.1 allows 2 hours to shutdown a recirculation loop and Condition 'D' Required Action D.1 allows 12 hours to be in Mode 3.

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Should you have any questions regarding the attached information, please contact Mr. David Lorring of my staff at (225) 381-4157.

Sincerely,


RJK/rlb

Attachments:

- (1) Reply to Non-cited Violation 50-458/2005005-02
- (2) River Bend Station Technical Specifications Section 3.4.1,
Recirculation Loops Operating (Excerpt)
- (3) River Bend Station Technical Specifications Section 3.3.1.1,
RPS Instrumentation (Excerpt)

CC:

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Non- Cited Violation

During a NRC inspection completed on December 31, 2005, a violation of NRC requirements was identified:

“The NRC identified a non-cited violation of Technical Specification 3.4.1.A for the licensee’s failure to shut down one reactor recirculation loop within 2 hours of determining that jet pump loop flow mismatch was greater than 5 percent while operating at greater than 70 percent of rated core flow. On October 31, 2005, the Reactor Recirculation Flow Control Valve (FCV) ‘B’ hydraulic power unit tripped because of a blown control power fuse, causing Flow Control Valve ‘B’ to drift open. Operators throttled closed Flow Control Valve ‘A’ to maintain reactor power at 100 percent, resulting in a jet pump loop flow mismatch of approximately 8.2 percent. The flow mismatch existed for 4.5 hours. The licensee entered this into their corrective action program as Condition Report CR-RBS-2006-00274 [...] Based on management review, the finding was determined to be of very low safety significance based on the short duration of the flow mismatch, 4.5 hours, and the low likelihood of a loss of coolant accident during that time.”

Discussion

On October 31st, 2005, during a filter replacement and re-installation on Recirculation Hydraulic Power Unit (“HPU”) ‘B’ Sub-loop 1, a conduit connected to a pressure switch was bumped and a small electrical arc was observed. As a result, FCV ‘B’ started to slowly drift from its initial position of 86.2% to approximately 92.6%, resulting in an increase in reactor power and a mismatch of recirculation flow between the two recirculation loops of approximately 8.2%.

Operators took immediate action to mitigate the flow mismatch and throttled closed recirculation FCV ‘A’ to maintain reactor power less than 100%. At 1506 on October 31st, 2005, operators entered TS 3.4.1.A, Condition ‘A’ because recirculation loop flow mismatch exceeded 5% with >70% rated core flow.

Corrective actions to evaluate and repair the faulted pressure switch and restore FCV ‘B’ to normal operation were initiated immediately. Given their knowledge that maintenance activities had coincided with the onset of the recirculation flow mismatch, operations personnel had high confidence in the ability to quickly restore recirculation flow parameters. In addition, based upon the operator’s judgment, priority was placed on conservatively minimizing plant maneuvers which might potentially elevate two fuel leaks that the station had been monitoring.

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Approximately one hour and eighteen minutes following entry into TS 3.4.1.A, Condition 'A', Required Action 'A', RBS determined the cause of the flow mismatch. In lieu of removing a Reactor Recirculation Loop from operation, Entergy chose instead to place the unit in Mode 3, if repairs could not be successfully implemented as expected. This action would satisfy LCO 3.4.1.A, Condition 'D', Required Action D.1.

On October 31st, 2005, at 1706, the operators entered LCO 3.4.1, Condition 'D', a twelve-hour shutdown Action Statement. When this decision was made, preparations were being made for the safe shutdown of the unit. By doing so, RBS maintained the acceptable safety levels; as allowed by TS. Approximately four and one half hours after entering TS LCO 3.4.1.A, Condition 'A', RBS restored recirculation loop flows (October 31st, 2005, @ 1936).

The NRC stated in their inspection report that the failure to comply with TS LCO 3.4.1 or complete the required action of TS 3.4.1.A.1 was a violation. Entergy respectfully disagrees with the NRC's position that this action was a violation and is providing the following information to support our denial of this violation.

Regulatory Basis

10 CFR50.36 Technical Specifications

Technical Specifications for operating reactors include a section specifying LCOs, which are the lowest functional capability or performance levels of equipment required for safe operation of the facility. This definition of the LCO is taken from 10 CFR50.36. Additionally, 10 CFR50.36 states that when a limiting condition for operation of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the technical specifications until the condition can be met.

The order of actions stated in 10 CFR50.36 lists the shutdown of the reactor as the first option, and taking remedial actions as the second option. This order is important because it lays a foundation for how technical specification actions are treated. This clearly supports the breadth of technical specifications to include all interim actions up to reactor shutdown—or exiting the mode of applicability.

Technical Specification Section 1.3 – Completion Time

Technical Specification Section 1.3 provides information for the use of Completion Times in the Action section of individual LCOs. These serve as fundamental principles for implementation of TS.

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Example 1.3-6 in TS Section 1.3 is similar to TS LCO 3.4.1.A. In this example, Condition 'A' contains two Required Actions (A.1 and A.2); either of which satisfy the Condition. Condition 'B' requires shutdown if the Required Actions of Condition 'A' are not met. The guidance states that if the Completion Time of A.1 or A.2 is not met, Condition 'B' is entered. It is noted that Required Action A.2 (Reduce thermal power to less than 50% RTP) in this example is very similar to LCO 3.4.1. While the example does not state the circumstances that allow Condition 'B' to be entered, it implies that a choice to move from Condition 'A' to Condition 'B' exists. The basis for the non-cited violation implies that entry into Condition 'B' without the completion of the Actions in Condition 'A' is only allowed if there is no method for compliance with the Actions of Condition 'A'. The NRC Region IV violation basis seems to be in conflict with the TS Section 1.3, Example 1.3-6.

Application of LCO 3.0.2

LCO 3.0.2 provides the applicability rules related to application of LCO Required Actions when a LCO is not met. In general, LCO 3.0.2 provides three remedies to address not meeting a LCO. The first is to comply with the Required Actions, the second is to restore compliance with the LCO, and the third is to place the plant in a mode of operation that is not applicable for the LCO. The Bases for LCO 3.0.2 states: "Completing the Required Actions is not required when an LCO is met or is no longer applicable, unless otherwise stated in the individual Specifications."

In the case of Technical Specification LCO 3.4.1, Condition 'D' provides the approach for accomplishing the Required Action to exit the Applicability of the LCO when the Required Actions of Condition 'A' are not met. During the specific event, RBS complied with the ACTIONS section of the LCO by entering and complying with the Required Actions of Condition 'D'. By doing so, the Required Actions of Condition 'A' were no longer applicable².

² This principle is also supported by TS Section 1.3 which states: "An ACTIONS Condition remains in effect and the Required Actions apply until the Condition no longer exists or the unit is not within the LCO Applicability."

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Application to Similar RBS Technical Specifications

Another example that demonstrates the fundamental principles of operator judgment and decision making during implementation of Technical Specification Actions is TS Bases 3.3.1.1, RPS Instrumentation. An excerpt is provided below: (Attachment 3 includes the TS Actions).

TS Bases 3.3.1.1 "RPS Instrumentation":

Required Actions A.1 and A.2 [...] If the inoperable channel cannot be restored to OPERABLE status within the allowable out of service time, the channel or the associated trip system must be placed in the tripped condition per Required Actions A.1 and A.2. Placing the inoperable channel in trip (or the associated trip system in trip) would conservatively compensate for the inoperability, restore capability to accommodate a single failure, and allow operation to continue. *Alternately, if it is not desired to place the channel (or trip system) in trip (e.g., as in the case where placing the inoperable channel in trip would result in a full scram), Condition D must be entered and its Required Action taken [...]*

While the Actions of TS 3.3.1.1.A.1 and A.2 require the inoperable channel(s) to be placed in trip, the Bases gives a clear choice to apply operating judgment to not do so and move to Condition 'D'. The NRC Region IV violation seems to be in conflict with this fundamental principle.

NRC Enforcement Manual NUREG/BR 0195

The NRC Enforcement Manual implements the 10CFR50.36 statements essentially unaltered by stating that Action Statements prescribe remedial measures and completion times required for each condition where the LCO is not met. Furthermore, the Enforcement Manual goes on to state that entry into a LCO is not a violation of license requirements. Additionally, it states, a violation does not exist based solely on the failure to restore the equipment to operable status within the required completion time.

In the NRC Enforcement Manual Chapter 8, it explains that a violation occurs *only* when the LCO is not met and all necessary actions have not been completed within all applicable completion times.

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See excerpt below:

Example 1

“When a pump is declared inoperable, Condition A is entered. If the pump is not restored to OPERABLE status within 7 days (the AOT), a violation does not exist. Instead, Condition B is entered and the Completion Time clocks for Required Actions B.1 and B.2 start. A total of 12 hours is allowed for reaching MODE 3 and a total of 36 (not 48 hours) is allowed for reaching MODE 4 from the time that Condition B was entered. If MODE 3 is reached within 6 hours, the time allowed for reaching MODE 4 is the next 30 hours because the total time allowed for reaching MODE 4 is 36 hours. *A violation exists if the pump cannot be restored to OPERABLE status after 7 days and the unit is not placed in MODE 3 within the next 12 hours or a violation exists if the pump cannot be restored to OPERABLE status after 7 days and the unit is not placed in MODE 4 within the next 36 hours.*”

RBS Specific Enforcement Precedence

Previous enforcement precedence appears to have been established when NRC responded to RBS Inspection Report 96-12 dated June 12, 1996. In this inspection report, an apparent violation of Technical Specification 3.8.1, Condition ‘B’ was identified based on an emergency diesel generator being inoperable for greater than 72 hours. RBS disagreed with this violation and provided an evaluation of the apparent violation to NRC. This evaluation, in part, was based on the premise that the Technical Specifications are not violated until all of the Actions available within the LCO ACTION section are expended. In this specific instance, a diesel was restored to service in 83 hours. This exceeded the 72 hour action time allowed by Technical Specification Condition ‘B’. However, an additional action was to achieve hot shutdown within 12 hours if Condition ‘B’ was not met. In a letter to RBS dated October 11, 1996, the NRC reconsidered its position on this violation stating:

“As to the first apparent violation, we have withdrawn it as NRC agrees with Entergy’s position that the TS, in this case, allow(s) a total of 84 hours to place the plant in Mode 3 and that a violation did not occur.”

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In the response, the NRC effectively stated that a violation of the ACTION for the LCO would *only* result if one failed to satisfy the final Required Action. NRC's previous conclusion in this instance supports that a violation of TS 3.4.1 should not be assessed.

Technical Specification 3.4.1 Action Statements provide two hours to place the unit in single loop operation, and an additional 12 hours to place the unit in hot shutdown. Applying a similar logic, violation of the Technical Specification would not occur until the unit has exceeded 14 hours in the condition without achieving hot shutdown. Therefore, in view of the aforementioned precedence, Entergy concludes that no violation of the Technical Specifications should be assessed.

Relationship to Reporting Guidelines

NRC regulation 10 CFR 50.73(a)(2)(i)(B) requires reporting "any operation or condition which was prohibited by the plant's Technical Specifications[...]" Section 3.2.2 of the Event Reporting Guidelines 10CFR50.72 and 50.73, Revision 2 (NUREG 1022), provides guidance on this reporting requirement. In Example 1 of this section, a Licensee Event Report (LER) is determined to be required when the initial completion time and the shutdown action statement completion time has been exceeded.

"An LER was required because the condition existed longer than allowed by the technical specifications (7-day LCO allowed outage time and the shutdown action statement time of 8 hours). Had the inoperability been identified and corrected within the required time, the event would not be reportable."

Applying this guidance to the specific case of Technical Specification 3.4.1, a LER would not be required until 14 hours had been exceeded without entering Mode 3. This non-cited violation appears to be in conflict with the reporting guidance as it states that a violation of Technical Specifications occurred after two hours without placing the unit in single loop operation. In general, violations of Technical Specifications are considered to be reportable under this requirement. However, NUREG 1022 is clear that this condition would not be reportable.

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River Bend Station Technical Specifications 3.4.1

At River Bend Station, Technical Specification 3.4.1, Recirculation Pumps Operating, governs operation of the reactor recirculation loops. The full text of TS 3.4.1 is attached as Attachment 2. The River Bend TS 3.4.1 is typical of standard TS Action Statements in that the TS first identifies the time necessary to restore the piece of inoperable equipment, and then identifies the time necessary to take other action, such as compensatory measures or shutdown, in the event that compliance with the LCO is not restored or the Required Action and associated Completion Time of Condition 'A' is not met. Specifically, the Bases of Action A.1 states that the mismatched flows must be matched within two hours. The time necessary to take other action is then identified: one recirculation loop must be shut down within two hours, or the unit must be brought to Mode 3 if compliance with the LCO is not met.

Conclusion

The over arching concern to Entergy is the potential for precedence setting if NRC continues to view this instance as a violation of Technical Specifications. Specifically, licensees would not be able to follow time tested principles used to implement Technical Specification actions nor would they be able to determine when conditions are prohibited by Technical Specifications when determining reportability. Current regulatory guidance does not support a determination that this specific issue is a violation. If the NRC decides to uphold this instance as a violation, it would be significant shift in industry and regulatory practice. This would result in a genuine need for industry generic action on the part of the NRC.

According to the Enforcement Manual, Action Statements identify the time necessary to restore the piece of inoperable equipment, identify the time necessary to take other remedial action, such as compensatory measures, or in the event that compliance with the LCO is not restored, shutdown. These fundamental principles are further supported by RBS specific enforcement precedence—a violation would occur *only* when the LCO is not met and all necessary actions have not been completed within all applicable completion times. Thus, the NRC should find no violation of TS 3.4.1 occurred. Entergy believes that by minimizing the amount of time that the station was operated in an off-normal condition³, and complying with TS, operators had minimized risk. Upon discovery of the recirculation mismatch, RBS personnel

³ Whether RBS moved controls rods, adjusted flow and or secured a recirculation loop additional maneuvers would have presented additional operational opportunities for error and increased the effects of recirculation flow excursions.

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quickly identified the cause of the mismatch and responsibly planned, allocated manpower, and executed the repair to the flow control valve to restore the recirculation flow mismatch. Factors underlying the operator's decisions were the following:

- The need to immediately stabilize the plant upset resulting from the flow mismatch
- A conservative concern for fuel and reactivity management and the desire to limit unnecessary transients—single loop, driving rods, etc.
- Full compliance with all applicable TS LCO 3.4.1.A Conditions and Required Actions (including Condition 'D', Required Action D.1)
- A high confidence that the cause of the recirculation flow mismatch was understood
- Restoration of the flow control valve would occur in a reasonable time period

Acting deliberately, the operators took immediate action to throttle closed Recirculation Flow Control Valve (FCV) 'A' to compensate for FCV 'B' which had drifted open creating a mismatch. Once this immediate response was taken, operators stabilized the plant.

Actions were initiated to identify the specific cause of the FCV 'B' drifting. Since the bumping of the conduit coincided with the initiation of FCV 'B' drifting, it was believed that the bumping was related to the cause. Within approximately one hour and eighteen minutes, RBS determined the specific cause and it was apparent that the valve would be restored in a short period of time. Ultimately, the valve was repaired, a warm-up completed and the Recirculation Flow mismatch mitigated within approximately four and one half hours.

Despite these efforts, RBS did not restore recirculation flow mismatch within the two hours allocated by TS LCO 3.4.1.A, Condition 'A', Required Action A.1. However, as allowed by TS Condition 'D', RBS personnel chose to repair the equipment and restore it to full functionality within the Completion Time allowed under Condition 'D', rather than implement the compensatory measures identified under Required Action A.1. In the judgment of the operators, this course of action was in full compliance with TS and precluded unnecessary plant maneuvering while minimizing the time that the plant was in an off-normal condition (either mismatched flows or single loop).

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RBS believes that the actions taken were within the scope of actions stated in TS 3.4.1 for the existing plant conditions. For this specific circumstance, entry into Condition 'D' of LCO 3.4.1 was appropriate based on the use and application principles of Technical Specification Section 1.0 and Technical Specification LCO 3.0.2. Entergy believes that this position is also supported by the NRC Enforcement Manual, NUREG 1022 Revision 2, Event Reporting Guidelines, and relevant RBS enforcement precedence. Entergy does not agree that a violation of TS LCO 3.4.1 occurred. Therefore, NRC should not assess a violation of TS 3.4.1, Action 'A'.

ATTACHMENT 2
River Bend Technical Specifications (Excerpt)
Recirculation Loops Operating
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3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.1 Recirculation Loops Operating

LCO 3.4.1

A. Two recirculation loops shall be in operation with matched flows.

OR

B. One recirculation loop shall be in operation with:

1. THERMAL POWER \leq 77.6% RTP;
2. Total core flow within limits;
3. LCO 3.2.1, "AVERAGE PLANAR LINEAR HEAT GENERATION RATE (APLHGR)," single loop operation limits specified in the COLR;
4. LCO 3.2.2, "MINIMUM CRITICAL POWER RATIO (MCPR)," single loop operation limits specified in the COLR; and
5. LCO 3.3.1.1, "Reactor Protection System (RPS) Instrumentation," Function 2.b (Average Power Range Monitors Flow Biased Simulated Thermal Power - High), Allowable Value for single loop operation as specified in the COLR.

APPLICABILITY: MODES 1 and 2.

ATTACHMENT 2
River Bend Station Technical Specifications (Excerpt)
 Recirculation Loops Operating
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ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Recirculation loop jet pump flow mismatch not within limits.	A.1 Shutdown one recirculation loop.	2 hours
B. THERMAL POWER > 77.6% RTP during single loop operation.	B.1 Reduce THERMAL POWER to ≤ 77.6% RTP.	1 hour
C. Requirements B.3, B.4, or B.5 of the LCO not met.	C.1 Satisfy the requirements of the LCO.	24 hours
D. Required actions and associated completion times of conditions A, B, or C not met. <u>OR</u> No recirculation loops in operation.	D.1 Be in Mode 3.	12 hours

ATTACHMENT 3
River Bend Station Technical Specifications (Excerpt)
RPS Instrumentation
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3.3.1.1 Reactor Protection System (RPS) Instrumentation

LCO 3.3.1.1 The RPS instrumentation for each Function in Table 3.3.1.1-1 shall be OPERABLE.

APPLICABILITY: According to Table 3.3.1.1-1.

ACTIONS

-----NOTE-----

Separate Condition entry is allowed for each channel.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more required channels inoperable.	A.1 Place channel in trip. OR A.2 Place associated trip system in trip.	12 hours 12 hours
B. One or more Functions with one or more required channels inoperable in both trip systems.	B.1 Place channel in one trip system in trip. OR B.2 Place one trip system in trip.	6 hours 6 hours
C. One or more Functions with RPS trip capability not maintained.	C.1 Restore RPS trip capability.	1 hour
D. Required Action and associated Completion Time of Condition A, B, or C not met.	D.1 Enter the Condition referenced in Table 3.3.1.1-1 for the channel.	Immediately
E. As required by Required Action D.1 and referenced in Table 3.3.1.1-1.	E.1 Reduce THERMAL POWER to < 40% RTP.	4 hours

ATTACHMENT 3
River Bend Station Technical Specifications (Excerpt)
RPS Instrumentation
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3.3 INSTRUMENTATION

3.3.1.1 Reactor Protection System (RPS) Instrumentation

LCO 3.3.1.1 The RPS instrumentation for each Function in Table 3.3.1.1-1 shall be OPERABLE.

APPLICABILITY: According to Table 3.3.1.1-1.

ACTIONS

-----NOTE-----
 Separate Condition entry is allowed for each channel.

CONDITION	REQUIRED ACTION	COMPLETION TIME
F. As required by Required Action D.1 and referenced in Table 3.3.1.1-1.	F.1 Reduce THERMAL POWER to < 23.8% RTP.	4 hours
G. As required by Required Action D.1 and referenced in Table 3.3.1.1-1.	G.1 Be in MODE 2.	6 hours
H. As required by Required Action D.1 and referenced in Table 3.3.1.1-1.	H.1 Be in MODE 3.	12 hours
I. As required by Required Action D.1 and referenced in Table 3.3.1.1-1.	I.1 Initiate action to fully insert all insertable control rods in core cells containing one or more fuel assemblies.	Immediately