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RBG-46606

July 2, 2007

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

SUBJECT: License Amendment Request
Application for Technical Specifications (TS) Change Regarding Mode
Change Limitations (TSTF-359) Using the Consolidated Line Item
Improvement Process (CLIIP), and Correct Example 1.4-1 (TSTF-485)
River Bend Station, Unit 1
Docket No. 50-458
License No. NPF-47

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, Entergy Operations, Inc. (Entergy) hereby requests the following amendment for River Bend Station, Unit 1 (RBS).

The proposed amendment would modify TS requirements for Mode change limitations in LCO 3.0.4 and SR 3.0.4. The proposed TS changes are consistent with Revision 9 of NRC-approved Industry Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-359, "Increase Flexibility in MODE Restraints." The availability of this TS improvement was announced in the Federal Register on April 4, 2003 as part of the consolidated line item improvement process (CLIIP).

Changes were also required to TS section 1.4, Frequency, Example 1.4-1 to make the example consistent with the changes to SR 3.0.4. These changes are supported by TSTF 485, Revision 0.

Attachment 1 provides a description of the proposed changes, the requested confirmation of applicability, and plant-specific verifications. Table 1 of Attachment 1 provides a brief summary of the TS changes. Attachment 2 provides the existing TS pages marked-up to show the proposed changes. Attachment 3 provides the existing TS Bases pages marked-up to show the proposed changes. The Bases changes are provided for information only.

RBS requests approval of the proposed License Amendment as soon as practical, with the amendment being implemented within 120 days from the date of approval. This additional time is requested to allow final implementation of necessary training and procedural revisions.

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In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated Louisiana State Official.

The proposed change has been evaluated in accordance with 10 CFR 50.91(a)(1) using criteria in 10 CFR 50.92(c) and it has been determined that this change involves no significant hazards consideration. The bases for these determinations are included in the attached submittal.

The proposed change includes no new commitments.

If you have any questions or require additional information, please contact Ron Byrd at 601-368-5792.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 2, 2007.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Venable", written in a cursive style.

Joseph E. Venable
Senior Vice President, Operations
River Bend Station, Unit 1

JEV/RWB

Attachments:

1. Description and Assessment
2. Proposed Technical Specification Changes (mark-up)
3. Changes to Technical Specification Bases Pages (mark-up) – For Information Only

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Attachment 1

RBG-46606

Description and Assessment

1.0 DESCRIPTION

The proposed amendment would modify the River Bend Station (RBS) Technical Specifications (TS) requirements for Mode change limitations in LCO 3.0.4 and SR 3.0.4..

The proposed TS changes are consistent with Nuclear Regulatory Commission (NRC) approved Industry TSTF STS change, TSTF-359, Revision 8, as modified by the notice in the Federal Register; published on April 4, 2003 (68 FR 16579). That Federal Register Notice (FRN) announced the availability of this TS improvement through the Consolidated Line Item Improvement Process (CLIIP).

TSTF-359, Revision 8 was subsequently revised to incorporate the modifications discussed in the April 4, 2003, FRN and other minor changes. TSTF-359, Revision 9 was subsequently submitted to the NRC on April 28, 2003 and was approved by the NRC on May 9, 2003.

The RBS TS already contain a TS Bases Control Program (TS 5.5.11) and SR 3.0.1, thus these requirements do not need to be added as described in NRC-approved Industry Technical Specification Task Force (TSTF) Standard Technical Specification (STS) Change, TSTF-359, Rev. 9, "Increase Flexibility in MODE Restraints."

Changes were also required to TS section 1.4, Frequency, Example 1.4-1 to make the example consistent with the changes to SR 3.0.4. These changes are supported by TSTF 485, Revision 0.

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

Entergy Operations, Inc. (EOI) has reviewed the safety evaluation published on April 4, 2003 (68 FR 16579) as part of the CLIIP Notice of Availability. This verification included a review of the NRC staffs safety evaluation, as well as the supporting information provided to support TSTF-359, Rev. 9. EOI has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to RBS and justify this amendment for the incorporation of the changes to the RBS TS.

2.2 Optional Changes and Variations

EOI is adopting the TS changes described in TSTF-359, Revision 9, and the NRC staffs model safety evaluation published on April 4, 2003, with the following exceptions.

1. Due to differences between the RBS TS and TS Bases and their corresponding model BWR/6 STS (NUREG-1434), in some cases variances from the TSTF marked-up changes are made. These variances are discussed below and do not affect the adoption or application of TSTF-359, Revision 9.
 - a. RBS TS LCO 3.4.7 RCS Leakage Detection Instrumentation, differs from the BWR/6 STS. The BWR/6 STS applies the "LCO 3.0.4 is not applicable" NOTE to all ACTIONS. In RBS TS 3.4.7, RCS Leakage Detection Instrumentation, the

NOTE is applied to REQUIRED ACTIONS A and D only. EOI has provided mark-ups which delete the NOTE in each location.

- b. In the TSTF mark-ups, BWR/6 STS 3.6.3.1, Primary Containment Hydrogen Recombiners, the NOTE "LCO 3.0.4 is not applicable," was removed from REQUIRED ACTION A. The RBS equivalent TS was deleted per TS Amendment 142, issued in NRC letter dated October 4, 2004. Therefore, RBS TS 3.6.3.1 markups are not included in this package.

2. TS Section 1.4 Frequency

Description: Section 1.4, Frequency, Example 1.4-1, is revised to be consistent with the changes to SR 3.0.4. SR 3.0.4 was revised by TSTF- 359, Revision 9, and the current example is not consistent with the Technical Specification requirements. The second paragraph of Example 1.4-1 is revised to reflect the changes made to SR 3.0.4.

Justification: The changes made in TSTF 359 to SR 3.0.4 have made certain statements in Example 1.4-1 incorrect. This change is consistent with TSTF-485, Rev. 0. As discussed in TSTF-485 this change is editorial for consistency with SR 3.0.4.

Table 1 of this attachment provides a brief summary of the changes.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Determination

EOI has reviewed the proposed no significant hazards consideration determination published on April 4, 2003 (68 FR 16579) as part of the CLIIP. EOI has concluded that the proposed determination presented in the notice is applicable to RBS and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91 (a).

3.2 Verification and Commitments

As discussed in the notice of availability published in the Federal Register on April 4, 2003 (68 FR 16579) for this TS improvement, the following plant-specific verifications were performed as follows:

EOI has proposed changes to the 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 proposed changes also include 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.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; 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; and LCO 3.0.4.c allows entry into a MODE or other specified condition in the Applicability with the LCO not met based on a Note in the Specification, which is typically applied to Specifications which describe values and parameters (e.g., RCS Specific Activity) though it may be applied to other Specifications based on NRC plant-specific 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 Risk 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. 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. 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 LCO not met has been delayed in accordance with SR 3.0.3. Finally, as noted in Section 1.0 above, the RBS TS already contain a TS Bases Control Program (TS 5.5.11) and SR 3.0.1, thus these requirements do not need to be added to the TS.

4.0 ENVIRONMENTAL EVALUATION

EOI has reviewed the environmental evaluation included in the model safety evaluation published on April 4, 2003 (68 FR 16579) as part of the CLIIP. EOI has concluded that the staffs findings presented in that evaluation are applicable to RBS and the evaluation is hereby incorporated by reference for this application.

TABLE 1

STS No.	RBS TS No.	Description of Change
1.4	1.4	The second paragraph of Example 1.4-1 is revised to reflect the changes made to SR 3.0.4.
LCO 3.0.4	LCO 3.0.4	Existing LCO has been replaced in its entirety with the revised insert.
SR 3.0.4	SR 3.0.4	Existing SR has been replaced in its entirety with the revised insert.
3.3.3.1	3.3.3.1	The ACTIONS NOTE stating "LCO 3.0.4 is not applicable." has been deleted and the remaining NOTE renumbered.
3.3.3.2	3.3.3.2	The ACTIONS NOTE stating "LCO 3.0.4 is not applicable." has been deleted and the remaining NOTE renumbered.
3.4.7	3.4.7	The NOTE in both REQUIRED ACTIONS A and D, stating "LCO 3.0.4 is not applicable." have been deleted.
3.4.8	3.4.8	The existing NOTE for REQUIRED ACTIONS is replaced with a NOTE stating "LCO 3.0.4.c is applicable."
3.4.9	3.4.9	The ACTIONS NOTE stating "LCO 3.0.4 is not applicable." has been deleted and the remaining NOTE renumbered.
3.5.1	3.5.1	A NOTE is added to the ACTIONS stating "LCO 3.0.4.b is not applicable to HPCS."
3.5.3	3.5.3	A NOTE is added to the ACTIONS stating "LCO 3.0.4.b is not applicable to RCIC."
3.6.3.1		Not applicable to RBS. TS 3.6.3.1 Deleted.
3.6.3.2	3.6.3.2	The REQUIRED ACTION A.1 NOTE stating "LCO 3.0.4 is not applicable." has been deleted.
3.6.3.3	3.6.3.3	The REQUIRED ACTION A.1 NOTE stating "LCO 3.0.4 is not applicable." has been deleted.
3.8.1	3.8.1	A NOTE is added to the ACTIONS stating "LCO 3.0.4.b is not applicable to DGs."

Attachment 2

RBG-46606

Proposed Technical Specification Changes (mark-up)

1.4 Frequency

EXAMPLES

EXAMPLE 1.4-1 (continued)

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

, as modified by SR 3.0.3,

EXAMPLE 1.4-2

SURVEILLANCE REQUIREMENTS

or the LCO is considered not met (in accordance with SR 3.0.1) and LCO 3.0.4 becomes applicable.

SURVEILLANCE	FREQUENCY
Verify flow is within limits.	Once within 12 hours after $\geq 23.8\%$ RTP <u>AND</u> 24 hours thereafter

Example 1.4-2 has two Frequencies. The first is a one time performance Frequency, and the second is of the type shown in Example 1.4-1. The logical connector "AND" indicates that both Frequency requirements must be met. Each time reactor power is increased from a power level $< 23.8\%$ RTP to $\geq 23.8\%$ RTP, the Surveillance must be performed within 12 hours.

The use of "once" indicates a single performance will satisfy the specified Frequency (assuming no other Frequencies are connected by "AND"). This type of Frequency does not qualify for the extension allowed by SR 3.0.2.

(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

INSERT
1A

~~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~~

(continued)

3.0 LCO APPLICABILITY

LCO 3.0.4
(continued)

specified conditions in the Applicability that are required to comply with ACTIONS, or that are part of a shutdown of the unit.

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 testing required to demonstrate OPERABILITY.

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.

(continued)

3.0 SR APPLICABILITY (continued)

SR 3.0.4

INSERT
2A

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 to prepare and submit a Special Report.	Immediately
C. One or more Functions with two required channels inoperable.	C.1 Restore one required channel to OPERABLE status.	7 days

(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

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.3.3.2.1 Perform CHANNEL CHECK for each required instrumentation channel that is normally energized.	31 days

(continued)

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.7 RCS Leakage Detection Instrumentation

LCO 3.4.7 The following RCS leakage detection instrumentation shall be OPERABLE:

- a. Drywell and pedestal floor drain sump monitoring systems;
- b. One channel of either drywell atmospheric particulate or atmospheric gaseous monitoring system; and
- c. Drywell air cooler condensate flow rate monitoring system.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Drywell or pedestal 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 and pedestal floor drain sump monitoring systems to OPERABLE status.</p>	30 days
B. Required drywell atmospheric monitoring system inoperable.	B.1 Analyze grab samples of drywell atmosphere.	Once per 24 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>C. Drywell air cooler condensate flow rate monitoring system inoperable.</p>	<p>-----NOTE----- Not applicable when the required drywell atmospheric monitoring system is inoperable. -----</p> <p>C.1 Perform SR 3.4.7.1.</p>	<p>Once per 8 hours</p>
<p>D. Required drywell atmospheric monitoring system inoperable.</p> <p><u>AND</u></p> <p>Drywell air cooler condensate flow rate monitoring system inoperable.</p>	<p>-----NOTE----- LCO 3.0.4 is not applicable. -----</p> <p>D.1 Restore required drywell atmospheric monitoring system to OPERABLE status.</p> <p><u>OR</u></p> <p>D.2 Restore drywell air cooler condensate flow rate monitoring system to OPERABLE status.</p>	<p>30 days</p> <p>30 days</p>
<p>E. Required Action and associated Completion Time of Condition A, B, C, or D not met.</p>	<p>E.1 Be in MODE 3.</p> <p><u>AND</u></p> <p>E.2 Be in MODE 4.</p>	<p>12 hours</p> <p>36 hours</p>
<p>F. All required leakage detection systems inoperable.</p>	<p>F.1 Enter LCO 3.0.3.</p>	<p>Immediately</p>

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.8 RCS Specific Activity

LCO 3.4.8 The DOSE EQUIVALENT I-131 specific activity of the reactor coolant shall be $\leq 0.2 \mu\text{Ci/gm}$.

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

ACTIONS

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

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 seven safety/relief valves shall be OPERABLE.

APPLICABILITY: MODE 1,
MODES 2 and 3, except ADS valves are not required to be OPERABLE with reactor steam dome pressure \leq 100 psig.

ACTIONS

INSERT 4A

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. High Pressure Core Spray (HPCS) System inoperable.	B.1 Verify by administrative means RCIC System is OPERABLE when RCIC is required to be OPERABLE.	1 hour
	<u>AND</u> B.2 Restore HPCS System to OPERABLE status.	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 ← **INSERT 5A**

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

3.6 CONTAINMENT SYSTEMS

3.6.3.2 Primary Containment and Drywell Hydrogen Igniters

LCO 3.6.3.2 Two divisions of primary containment and drywell hydrogen igniters shall be OPERABLE, each with > 90% of the associated igniter assemblies OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One primary containment and drywell hydrogen igniter division inoperable.	<p>A.1</p> <p style="text-align: center;"> -----NOTE----- LCO 3.0.4 is not applicable. ----- </p> <p>Restore primary containment and drywell hydrogen igniter division to OPERABLE status.</p>	30 days
B. Two primary containment and drywell hydrogen igniter divisions inoperable.	<p>B.1</p> <p>Verify by administrative means that the hydrogen control function is maintained.</p>	1 hour
	<p><u>AND</u></p> <p>B.2</p> <p>Restore one primary containment and drywell hydrogen igniter division to OPERABLE status.</p>	7 days

(continued)

3.8 ELECTRICAL POWER SYSTEMS

3.8.1 AC Sources-Operating

LCO 3.8.1 The following AC electrical power sources shall be OPERABLE:

- a. Two qualified circuits between the offsite transmission network and the onsite Class 1E AC Electric Power Distribution System; and
- b. Three diesel generators (DGs).

APPLICABILITY: MODES 1, 2, and 3.

-----NOTE-----

Division III AC electrical power sources are not required to be OPERABLE when High Pressure Core Spray System and Standby Service Water System pump 2C are inoperable.

INSERT 6A

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One required offsite circuit inoperable.	A.1 Perform SR 3.8.1.1 for OPERABLE required offsite circuit. <u>AND</u>	1 hour <u>AND</u> Once per 8 hours thereafter (continued)

INSERT 1A (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 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 2A (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.

INSERT 3A (RCS SPECIFIC ACTIVITY)

-NOTE-
LCO 3.0.4.c is applicable.

INSERT 4A (LCO 3.5.1, ECCS - OPERATING)

-NOTE-

LCO 3.0.4.b is not applicable to HPCS.

INSERT 5A (LCO 3.5.3, RCIC SYSTEM)

-NOTE-

LCO 3.0.4.b is not applicable to RCIC.

INSERT 6A (LCO 3.8.1, AC SOURCES - OPERATING)

-NOTE-

LCO 3.0.4.b is not applicable to DGs.

Attachment 3

RBG-46606

**Changes to Technical Specification Bases Pages
For Information Only**

BASES

LCO 3.0.3
(continued)

assemblies in the associated fuel storage pool." Therefore, this LCO can be applicable in any or all MODES. If the LCO and the Required Actions of LCO 3.7.6 are not met while in MODE 1, 2, or 3, there is no safety benefit to be gained by placing the unit in a shutdown condition. The Required Action of LCO 3.7.6 of "Suspend movement of irradiated fuel assemblies in the associated fuel storage pool(s)" is the appropriate Required Action to complete in lieu of the actions of LCO 3.0.3. These exceptions are addressed in the individual Specifications.

LCO 3.0.4

INSERT
1B

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 LCO's 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

(continued)

BASES

LCO 3.0.4
(continued)

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.

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 3.0.4 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.

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.

(continued)

BASES

SR 3.0.3
(continued) 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

INSERT
2B

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 in 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.

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.

(continued)

BASES

SR 3.0.4
(continued)

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

12. Penetration Flow Path, Automatic Primary Containment Isolation Valve (PCIV) Position (continued)

two total channels of PCIV position indication for a penetration flow path with two automatic valves. For containment penetrations with only one automatic PCIV having control room indication, Note (c) requires a single channel of valve position indication to be OPERABLE. This is sufficient to verify redundantly the isolation status of each isolable penetration via indicated status of the automatic valve and, as applicable, prior knowledge of passive valve or system boundary status. If a penetration is isolated by at least one closed and de-activated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured, position indication for the PCIV(s) in the associated penetration flow path is not needed to determine status. Therefore, the position indication for valves in an isolated penetration is not required to be OPERABLE.

The PCIV position PAM instrumentation consists of individual position indication (open - closed) in the control room for each automatic containment isolation valve as described in USAR Section 7.5 (Reference 3). Automatic PCIVs are listed in Technical Requirements Manual, Table TR 3.6.1.3-1 (Reference 4).

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 alternate instruments and methods, and the low probability of an event requiring these instruments.~~

(continued)

BASES

ACTIONS
(continued)

A Note has ~~also~~ 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 inoperable functions. As such, a Note has been provided that allows separate Condition entry for each inoperable PAM Function.

A.1

When one or more Functions have one required channel that is inoperable, the required inoperable channel must be restored to OPERABLE status within 30 days. The 30 day Completion Time is based on operating experience and takes into account the remaining OPERABLE channel(s) (or in the case of a Function that has only one required channel, other non-Regulatory Guide 1.97 instrument channels to monitor the Function), the passive nature of the instrument (no critical automatic action is assumed to occur from these instruments), and the low probability of an event requiring PAM instrumentation during this interval.

B.1

If a channel has not been restored to OPERABLE status in 30 days, this Required Action specifies initiation of actions to prepare and submit a Special Report to the NRC. This report discusses the results of the root cause evaluation of the inoperability and identifies proposed restorative actions. The Special Report shall be submitted in accordance with 10 CFR 50.4 within 14 days of entering Condition B. This Action is appropriate in lieu of a shutdown requirement since alternative Actions are identified before loss of functional capability, and given the likelihood of plant conditions that would require information provided by this instrumentation.

(continued)

BASES (continued)

APPLICABILITY The Remote Shutdown System LCO is applicable in MODES 1 and 2. This is required so that the plant can be placed and maintained in MODE 3 for an extended period of time from a location other than the control room.

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 Z 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 the control and transfer switches for any required Function.

(continued)

BASES (continued)

ACTIONS

A.1

With the drywell or pedestal floor drain sump monitoring system inoperable, no other form of sampling can provide the equivalent information to quantify leakage. However, the drywell atmospheric activity monitor and the drywell air cooler condensate flow rate monitor will provide indications of changes in leakage.

With the drywell or pedestal floor drain sump monitoring system inoperable, but with RCS unidentified and total LEAKAGE being determined every 12 hours (SR 3.4.5.1), operation may continue for 30 days. The 30 day Completion Time of Required Action A.1 is acceptable, based on operating experience, considering the multiple forms of leakage detection that are still available. Required Action A.1 is 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 the drywell floor drain sump monitoring system is inoperable. This allowance is provided because other instrumentation is available to monitor RCS leakage.

B.1

With both gaseous and particulate drywell atmospheric monitoring channels inoperable, grab samples of the drywell atmosphere shall be taken and analyzed to provide periodic leakage information. Provided a sample is obtained and analyzed every 24 hours, the plant may continue operation since at least one other form of drywell leakage detection (i.e., air cooler condensate flow rate monitor) is available.

The 24 hour interval provides periodic information that is adequate to detect LEAKAGE.

C.1

With the required drywell air cooler condensate flow rate monitoring system inoperable, SR 3.4.7.1 is performed every 8 hours to provide periodic information of activity in the drywell at a more frequent interval than the routine Frequency of SR 3.4.7.1. The 8 hour interval provides

(continued)

BASES

ACTIONS

C.1 (continued)

periodic information that is adequate to detect LEAKAGE and recognizes that other forms of leakage detection are available. However, this Required Action is modified by a Note that allows this action to be not applicable if the required drywell atmospheric monitoring system is inoperable. Consistent with SR 3.0.1, Surveillances are not required to be performed on inoperable equipment.

D.1 and D.2

With both the gaseous and particulate drywell atmospheric monitor channels and the drywell air cooler condensate flow rate monitor inoperable, the only means of detecting LEAKAGE is the drywell floor drain sump monitoring system. This Condition does not provide the required diverse means of leakage detection. The Required Action is to restore either of the inoperable monitoring systems to OPERABLE status within 30 days to regain the intended leakage detection diversity. The 30 day Completion Time ensures that the plant will not be operated in a degraded configuration for a lengthy time period. 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 drywell gaseous and particulate atmospheric monitoring channels and drywell air cooler condensate flow rate monitoring system are inoperable. This allowance is provided because other instrumentation is available to monitor RCS leakage.

E.1 and E.2

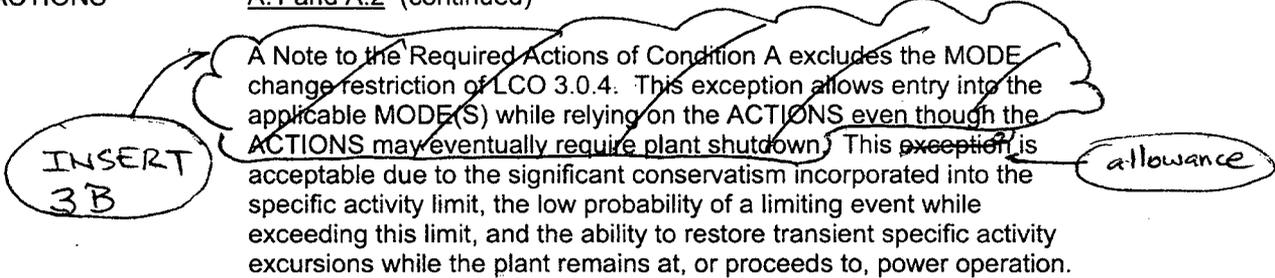
If any Required Action of Condition A, B, C, or D cannot be met within the associated Completion Time, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours and to MODE 4 within 36 hours. The allowed Completion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

(continued)

BASES

ACTIONS

A.1 and A.2 (continued)



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 specific activity limit, the low probability of a limiting event while exceeding this limit, and the ability to restore transient specific activity excursions while the plant remains at, or proceeds to, power operation.

B.1, B.2.1, B.2.2.1, and B.2.2.2

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 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 more than a small fraction of the requirements of 10 CFR 50.67 during a postulated MSLB accident.

Alternately, the plant can be brought to MODE 3 within 12 hours and to 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 based on 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 bringing the plant to MODES 3 and 4 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

APPLICABILITY
(continued)

The requirements for decay heat removal in MODES 4 and 5 are discussed in LCO 3.4.10, "Residual Heat Removal (RHR) Shutdown Cooling System- Cold Shutdown"; LCO 3.9.8, "Residual Heat Removal (RHR)- High Water Level"; and LCO 3.9.9, "Residual Heat Removal (RHR)- Low Water Level."

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.

(continued)

BASES (continued)

ACTIONS

INSERT
4B

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 by assuming that 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 HPCS System is inoperable, and the RCIC System is verified to be OPERABLE (when RCIC is required to be OPERABLE), the HPCS 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 the 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 HPCS is inoperable and RCIC is required to be OPERABLE. This may be performed by an administrative check, by examining logs or other information, to determine if RCIC is out of service for maintenance or other reasons. It is not necessary to perform the Surveillances needed to demonstrate the OPERABILITY of the RCIC System. However, if the OPERABILITY of the RCIC System cannot be verified and RCIC is required to be OPERABLE, Condition D 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 the results of a reliability study (Ref. 12) and has been found to be acceptable through operating experience.

(continued)

BASES

BACKGROUND
(continued) The RCIC pump is provided with a minimum flow, bypass line which discharges to the suppression pool. The valve in this line automatically opens to prevent pump damage due to overheating 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 line "keep fill" system is designed to maintain the pump discharge line filled with water.

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 the safety analysis does not consider RCIC to be a system needed to mitigate the consequences of a control rod drop accident. Based on its contribution to the reduction of overall plant risk, however, the system is included in the Technical Specifications as required by the NRC Policy Statement.

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

APPLICABILITY The RCIC System is required to be OPERABLE in 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 ECCS injection/spray subsystems can provide sufficient flow to the vessel.

ACTIONS

A.1 and A.2

INSERT
5B

If the RCIC System is inoperable during MODE 1, or MODES 2 or 3 with reactor steam dome pressure > 150 psig, and the HPCS 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

(continued)

BASES

ACTION

~~A.1 (continued)~~

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

B.1 and B.2

With two primary containment and drywell igniter divisions 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 at least one hydrogen recombiner and one hydrogen mixing subsystem. The 1 hour Completion Time allows a reasonable period of time to verify that a loss of hydrogen control function does not exist. The verification may be performed as an administrative check by examining logs or other information to determine the availability of the alternate hydrogen control capabilities. It does not mean to perform the Surveillances needed to demonstrate OPERABILITY of the alternate hydrogen control capabilities. If the ability to perform the hydrogen control function is maintained, continued operation is permitted with two igniter divisions inoperable for up to 7 days. Seven days is a reasonable time to allow two igniter divisions 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 the amounts capable of exceeding the flammability limit.

C.1

If any Required Action and required 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

(continued)

BASES

APPLICABILITY In MODES 1 and 2, the two primary containment/drywell hydrogen mixing subsystems ensure the capability to prevent localized hydrogen concentrations above the flammability limit of 4.0 v/o in the drywell, assuming a worst case single active failure.

In MODE 3, both the hydrogen production rate and the total hydrogen produced after a LOCA would be less than that calculated for the DBA LOCA. Also, because of the limited time in this MODE, the probability of an accident requiring the Primary Containment/Drywell Hydrogen Mixing System is low. Therefore, the Primary Containment/Drywell Hydrogen Mixing System is not required in MODE 3.

In MODES 4 and 5, the probability and consequences of a LOCA are reduced due to the pressure and temperature limitations in these MODES. Therefore, the Primary Containment/Drywell Hydrogen Mixing System is not required in these MODES.

ACTIONS

A.1

With one primary containment/drywell hydrogen mixing subsystem inoperable, the inoperable subsystem must be restored to OPERABLE status within 30 days. In this condition, the remaining OPERABLE subsystem is adequate to perform the hydrogen mixing function. However, the overall reliability is reduced because a single failure in the OPERABLE subsystem could result in reduced hydrogen mixing capability. The 30 day Completion Time is based on the low probability of failure of the OPERABLE primary containment/drywell hydrogen mixing subsystem, the low probability of a LOCA that would generate hydrogen in amounts capable of exceeding the flammability limit, and the amount of time available after the event for operator action to prevent hydrogen accumulation from exceeding this limit.

~~Required Action A.1 has been modified by a Note indicating the provisions of LCO 3.0.4 are not applicable. As a result, a MODE change is allowed when one subsystem 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 subsystem, and the amount of time available after a postulated LOCA for operator action to prevent exceeding the flammability limit.~~

(continued)

BASES

LCO
(continued) The AC sources in one division must be separate and independent (to the extent possible) of the AC sources in the other division(s). For the DGs, the separation and independence are complete. For the offsite AC sources, the separation and independence are to the extent practical.

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.

A Note has been added taking exception to the Applicability requirements for Division III sources, provided the HPCS System and SSW pump 2C is declared inoperable. This exception is intended to allow declaring of the HPCS System inoperable either in lieu of declaring the Division III source inoperable, or at any time subsequent to entering ACTIONS for an inoperable Division III source. This exception is acceptable since, with the HPCS System inoperable and the associated ACTIONS entered, the Division III AC sources provide no additional assurance of meeting the above criteria.

AC power requirements for MODES 4 and 5 are covered in LCO 3.8.2, "AC Sources – Shutdown."

ACTIONS

INSERT
6B

A.1

To ensure a highly reliable power source remains, 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 the Required Action not met. However, if a second required circuit fails SR 3.8.1.1, the second offsite circuit is inoperable, and Condition C, for two offsite circuits inoperable, is entered.

(continued)

INSERT 1B (LCO 3.0.4 BASES)

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 to 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.

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 allowance 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 in 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., RCS Specific Activity), 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.

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 2B (SR 3.0.4 BASES)

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 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 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 3B (RCS SPECIFIC ACTIVITY BASES)

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.

INSERT 4B (LCO 3.5.1, ECCS - OPERATING)

A Note prohibits the application of LCO 3.0.4.b to an inoperable HPCS subsystem. There is an increased risk associated with entering a MODE or other specified condition in the Applicability with an inoperable HPCS subsystem and the provisions of LCO 3.0.4.b, which allow 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 5B (LCO 3.5.3, RCIC SYSTEM)

A Note prohibits the application of LCO 3.0.4.b to an inoperable RCIC system. There is an increased risk associated with entering a MODE or other specified condition in the Applicability with an inoperable RCIC system and the provisions of LCO 3.0.4.b, which allow 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 6B (LCO 3.8.1, AC SOURCES - OPERATING)

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 allow 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