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MFN 08-104 Supplement 1

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Subject: **Follow-up Response to NRC Request for Additional Information Related to ESBWR Design Certification Application - Technical Specifications - RAI Number 16.2-156, Supplement 1**

Enclosures 1, 2, and 3 contain the subject GE Hitachi Nuclear Energy (GEH) follow-up response to the RAI response provided in DCD Revision 5 submitted in Reference 1.

As indicated in DCD Chapter 16, Specification 5.5.11, Setpoint Control Program, NEDE- 33304P-A, "GEH ABWR/ESBWR Setpoint Methodology," is incorporated by reference and is within the scope of the ESBWR certification review. The specific NEDE-33304P-A revision number and date, as well as the corresponding future NRC Safety Evaluation date and ADAMS accession number, are shown in brackets as a COL-holder item -- simply as a placeholder. The final DCD Is planned to include the NRC approval details and removal of the brackets.

If you have any questions or require additional information regarding the information provided here, please contact me.

Sincerely,

Richard E. Kingston

Richard E. Kingston
Vice President, ESBWR Licensing

D068
NRO

Reference:

1. MFN 08-487, Letter from James C. Kinsey to U.S. Nuclear Regulatory Commission, *GE Hitachi Nuclear Energy - ESBWR Standard Plant Design Revision 5 to Design Control Document - Tier 1 and Tier 2*

Enclosures:

1. MFN 08-104 Supplement 1 – Follow-up Response to RAI Number 16.2-156, Supplement 1
2. MFN 08-104 Supplement 1 – DCD Markups for RAI Number 16.2-156, Supplement 1
3. MFN 08-104 Supplement 1 – Comparison to Example Setpoint Control Program Specification for RAI Number 16.2-156, Supplement 1

cc:

AE Cubbage	USNRC (with enclosures)
DH Hinds	GEH (with enclosures)
RE Brown	GEH (with enclosures)
eDRF	000-0076-3361, Revision 1

Enclosure 1

MFN 08-104 Supplement 1

Response to NRC Request for

Additional Information Letter No. 188

Related to ESBWR Design Certification Application

- Technical Specifications -

RAI Number 16.2-156 S01

NRC RAI 16.2-156

In Revisions 3 and 4 of DCD Tier 2, Chapter 16, each background section of the generic technical specifications (GTS) bases for the instrumentation specifications describes how to determine the operability of an instrument channel with respect to its trip setpoint compared to the allowable value. "A channel is inoperable if its actual trip setpoint is non-conservative with respect to its required Allowable Value." Details are to be included in a Setpoint Control Program (SCP) proposed for Section 5.5 of the GTS administrative controls chapter. As of the issuance of Revision 4, the applicant had not formally stated what kind of setpoint values the GTS instrumentation function tables will state (i.e., Allowable Values, Trip Setpoints, Setting basis, etc.). Revision 4 retained the proposed SCP specification in the GTS. Please revise GTS limiting condition for operation (LCO) instrumentation function tables to include the type of setpoint value for each function that is consistent with the ABWR/ESBWR setpoint methodology (currently under staff review) and acceptable to the staff.

The various channel calibration surveillance frequencies are consistent with the STS for equivalent instrument functions. However, the technical basis for applying these frequencies to ESBWR instrumentation functions is an open issue pending NRC approval of {NEDO-33201, "ESBWR Design Certification Probabilistic Risk Assessment"}, which is referenced in the GTS bases. Revise the GTS Bases to state, or include as a numbered reference, the NRC-approved justification for the channel calibration surveillance frequencies.

GEH Response

GEH submitted MFN 07-015, Supplement 2, dated January 16, 2008, to address the appropriate type of setpoint value consistent with the ESBWR setpoint methodology. The ESBWR Technical Specification instrumentation tables provided in that submittal reflect Allowable Values, consistent with other BWR Standard Technical Specification presentations.

The ESBWR Technical Specification and Bases were also revised as shown in MFN 07-536, dated November 12, 2007, in response to RAIs 16.2-146 and 16.2-149 to reflect removal of the open issue (referenced in the RAI above). The changes clarify that the calibration frequencies are based on the setpoint analysis. The setpoint analysis methodology, supporting the Channel Calibration surveillance frequencies, is required by the ESBWR Specification 5.5.11, Setpoint Control Program (SCP), as was modified in MFN 07-536.

DCD Impact

No DCD changes will be made in response to this RAI.

NRC RAI 16.2-156, Supplement 1

The ESBWR generic technical specifications bases, Revision 4 of DCD Tier 2, Chapter 16B, state that the nominal trip setpoint (NTSP) meets the definition of a limiting safety system setting (LSSS), which 10 CFR 50.36 defines and requires to be included in technical specifications. General Electric-Hitachi's response to RAI 7.2-36, Supplement 1, indicates that the NTSP is the nominal trip setpoint final ($NTSP_F$), as defined by the setpoint methodology proposed in NEDE-33304P, October 2007.

However, the ESBWR generic technical specifications, Revision 4 of DCD Tier 2, Chapter 16, do not include a $NTSP_F$ setting for each instrumentation function, but only include the Allowable Value. Because 10 CFR 50.36(d)(1)(ii)(A) requires the LSSS to be in the technical specifications, and the $NTSP_F$ is the LSSS for an instrumentation function channel, revise the generic technical specifications to include either

- *the $NTSP_F$ value, in addition to the Allowable Value, or*
- *a setpoint control program (SCP) administrative control specification, acceptable to the NRC staff for meeting 10 CFR 50.36(d)(1)(ii)(A), that requires documenting the $NTSP_F$ value in a SCP-required document*

for each Technical Specification required automatic protection instrumentation function.

The SCP should explicitly include:

1. *A statement that the NTSP corresponds to the LSSS.*
2. *A requirement to calculate LTSP, NTSP, AV, ALT, and AFT in conformance with the setpoint methodology previously reviewed and approved by NRC, and conditions in the associated NRC staff safety evaluation. (Note: The NRC staff will not approve the methodology unless the methodology allows little variation in the values calculated by different analysts using identical input values (such as uncertainties and channel calibration drift)).*
3. *The title and date of the approved setpoint methodology document and the title and date of the associated NRC safety evaluation are explicitly stated. (Note: This will ensure that changes to the methodology or deviation from the conditions in the safety evaluation will require a license amendment.)*
4. *A requirement for a document to contain the values of the current LTSP, NTSP, AV, ALT, and AFT for each Technical Specification required automatic protection instrumentation function, and that the document is controlled under 10 CFR 50.59.*
5. *A requirement to declare the channel inoperable if as-found setting determined during Channel Calibration is non-conservative to AV.*
6. *A requirement to evaluate channel functionality if as-found setting determined during Channel Calibration is non-conservative to AFT (with AFT determined as described in RIS 2006-17).*

7. *A requirement to set the channel within ALT around NTSP (the actual setting, equal to or conservative to the LTSP, which is the LSP defined in RIS 2006-17) at the completion of Channel Calibration.*

An example of a SCP specification acceptable to the NRC staff is provided in {NRC RAI Letter No. 188, Enclosure 2 / below}. The proposed instrumentation design would permit performance of Channel Operational Tests on the ESBWR instrumentation functions; therefore, the example SCP includes the COT in addition to the Channel Calibration. Add COT to generic TS surveillance requirements and its definition from NUREG-1431, Rev 3.1, to generic TS Section 1.1, with corresponding Bases changes.

Example Setpoint Control Program Specification (RAI 16.2-156 Supplement 1) {from NRC RAI Letter No. 188 Enclosure 2}

5.0 ADMINISTRATIVE CONTROLS

5.5 Programs and Manuals

The following programs shall be established, implemented, and maintained.

5.5.11 Setpoint Control Program

a. The Setpoint Control Program (SCP) implements the regulatory requirement of 10 CFR 50.36(d)(1)(ii)(A) that technical specifications will include items in the category of limiting safety system settings (LSSS), which are settings for automatic protective devices related to those variables having significant safety functions.

b. The Limiting Trip Setpoint (LTSP), Nominal Trip Setpoint (NTSP), Allowable Value (AV), As-Found Tolerance (AFT), and As-Left Tolerance (ALT) for each Technical Specification required automatic protection instrumentation function shall be calculated in conformance with the instrumentation setpoint methodology previously reviewed and approved by the NRC in NEDE-33304P-A, "GEH ABWR/ESBWR Setpoint Methodology," [Revision #, dated Month dd, yyyy, (MLxxxxxxxxx)], and the conditions stated in the associated NRC safety evaluation, [Letter to GEH from NRC, Title, dated Month, dd, yyyy, (MLxxxxxxxxx)].

c. Performance of a CHANNEL CALIBRATION and a CHANNEL OPERATIONAL TEST surveillance shall include the following:

1. The as-left value of the instrument channel trip setting shall be the value at which the channel was set at the completion of the surveillance with no additional adjustment of the instrument channel. The as-found value of the instrument channel trip setting shall be the trip setting value measured during the subsequent performance of the surveillance before making any adjustment to the instrument channel that could change the trip setting value.

2. The as-found value of the instrument channel trip setting shall be compared with the previous as-left value or the specified NTSP. If the as-found value is compared with the specified NTSP to meet this requirement, the following conditions apply:

i. the setting tolerance band (the specified ALT) must be less than or equal to the square root of the sum of the squares of reference accuracy, measurement and test equipment, and readability uncertainties;

ii. the setting tolerance band (the specified ALT) must be included in the total loop uncertainty; and

iii. the pre-defined test acceptance criteria band (the specified AFT) for the as-found value must include either the setting tolerance band (the specified ALT) or the uncertainties associated with the setting tolerance band (the specified ALT), but not both of these.

3. If the as-found value of the instrument channel trip setting differs from the previous as-left value or the specified NTSP by more than the pre-defined test acceptance criteria band (the specified AFT), when compared in accordance with paragraph c.2 above, then this condition shall be dispositioned by the plant's corrective action program, and the instrument channel shall be evaluated to verify that it is functioning in accordance with its design basis before declaring the surveillance requirement met and returning the instrument channel to service.

4. If the as-found value of the instrument channel trip setting is less conservative than the specified AV, then the surveillance requirement is not met and the instrument channel shall be immediately declared inoperable.

5. The instrument channel trip setting shall be set to a value within the specified ALT around the specified NTSP (a trip setting as or more conservative than the specified LTSP) at the completion of the surveillance; otherwise, the surveillance requirement is not met and the instrument channel shall be immediately declared inoperable.

d. The difference between the instrument channel trip setting as-found value and either the previous as-left value or the specified NTSP, for each Technical Specification required automatic protection instrumentation function shall be trended and evaluated to verify that the instrument channel is functioning in accordance with its design basis.

e. The SCP shall establish a document containing the current value of the specified LTSP, NTSP, AV, AFT, and ALT for each Technical Specification required automatic protection instrumentation function, a record of changes to those values, and references to the calculation documentation. Changes to this document shall be governed by the regulatory requirements of 10 CFR 50.59.

GEH Response

GEH submitted DCD Revision 5 (MFN 08-487, June 1, 2008), which included revisions to Technical Specification (TS) 5.5.11, Setpoint Control Program (SCP), as well as to Table 16.0-2-H, intended to address the NRC Staff proposed SCP in RAI 16.2-156, Supplement 1.

Enclosed in this supplemental response to the subject RAI are two Enclosures:

Enclosure 2: Enclosure 2 contains a markup correction to TS 5.5.11.c.1.i, which was inadvertently omitted in the transmitted DCD Revision 5. The correction regards the requirements for when the as-found value of the instrument channel trip setting differs from the previous as-left value or the specified $NTSP_F$ by more than the pre-defined test acceptance criteria band (i.e., the specified AFT). The corrected wording reflects consensus comments from Utility representatives who are involved with the internal review procedures incorporated by GEH and provides a clearer presentation of the intended requirements.

The correction replaces "then this condition shall be trended and evaluated within the plant's corrective action program, to verify that it is functioning in accordance with its design basis" with "then the instrument channel shall be evaluated." Concurrent with this change, a new sentence is added at the end of TS 5.5.11.c.1.i: "This condition shall be dispositioned by the plant's corrective action program." This provides the requirement to disposition the channel's condition within the plant's corrective action program.

The changes reflect the fact that the 10CFR 50, Appendix B, Corrective Action Program evaluation activity is separate from the channel calibration surveillance performance and follows the immediate evaluation made prior to declaring the surveillance requirement met and returning the instrument channel to service.

Enclosure 3: The SCP proposed by the NRC Staff in the RAI is shown with "redline-strikeout" comparison and annotation-note labels in the margin. This comparison is intended to facilitate the NRC review of the GEH response to RAI 16.2-156, Supplement 1 that is included in DCD Revision 5, as corrected in Enclosure 2 (discussed above). The most notable distinction between the RAI proposed SCP and the ESBWR DCD Revision 5 SCP is the separation of the requirements into TS Program requirements and Reviewer's Note guidance applicable to defining an acceptable setpoint methodology. The Reviewer's Note is located in Table 16.0-2-H in DCD Revision 5. In general, GEH made efforts to retain the wording and details of the RAI proposed SCP.

The Enclosure 3 comparison includes margin labels that provide a "key" cross-reference to the following discussions. These discussions outline the disposition and/or basis for the specific deviation from the NRC Staff proposal. .

[1] Since the SCP contains bracketed placeholder for referencing the NRC approved setpoint methodology, the ESBWR Generic Technical Specifications (GTS) format requires a Reviewer's Note associated with a COL Item. The GTS format includes a margin label cross-reference to the applicable COL Item in DCD 16.0.

Also note that the instances of "NTSP" have been clarified to included the subscript "F"; consistent with the specific GEH setpoint methodology for the nominal as-left setting.

[2] An introductory phrase ("For each Technical Specification required automatic protection instrumentation function...") is included to clarify the intent consistent with the remaining text of the SCP. Furthermore, the optional reference to "Channel Operational Test" is eliminated as not applicable to the ESBWR GTS.

[3] Defining the as-left and as-found values, the setting tolerance band (the specified ALT), and the pre-defined test acceptance criteria band (the specified AFT), is within the scope of the setpoint methodology and is appropriate to be included as a Reviewer's Note outlining the necessary attributes for an acceptable methodology. Once the methodology is reviewed and approved, and included in the SCP as a requirement, the methodology-specific definitions would apply. This editorial reformatting relocates this text to the Reviewer's Note in Table 16.0-2-H. It is noted that the GEH methodology presented in NEDE-33304 defines these terms consistent with the NRC guidance provide in these relocated sections.

[4] This change is addressed in the discussion of the Enclosure 2 change.

[5] Clarification is included for the condition where the as-found value of the instrument channel trip setting is less conservative than the specified AV. The clarification provides the appropriate requirements to complete the required surveillance steps for return to service; i.e., (a) an evaluation for operability, and (b) resetting the instrument channel to within the ALT.

[6] The deleted phrase "(a trip setting as or more conservative than the specified LTSP)" constitutes a descriptive definition of one aspect of the nominal trip setpoint, and is appropriately defined within the scope of the setpoint methodology. Once the methodology is reviewed and approved, and included in the SCP as a requirement, the methodology-specific definitions would apply.

[7] The requirement for the instrument function to be "trended and evaluated to verify that the instrument channel is functioning in accordance with its design basis" is best presented as a Licensee regulatory commitment. As such, the requirement is relocated to the Reviewer's Note to be implemented by the COL holder upon closing the COL Item that implements an NRC approved setpoint methodology within the SCP.

In relocating this requirement, it is also clarified to apply when the as-found condition differs by more than the pre-defined test acceptance criteria band (i.e., the specified AFT). Channels behaving within the expected AFT are inherently functioning within the design basis and no formal trending and evaluation is necessary.

Furthermore, the SCP includes the requirement to conform to conditions stated in the NRC safety evaluation. Presuming the safety evaluation would include the condition that the Licensee implements the appropriate trending and evaluation of channels found beyond the AFT, then including this commitment within the SCP would be superfluous. Finally, since the SCP is tied expressly to performance of CHANNEL CALIBRATIONS, and the activity to trend and evaluate is separate from satisfactory performance of the TS Surveillance, it is appropriate to retain the subsequent evaluation as a separate commitment.

[8] By specifying that the "Changes to this document shall be governed by the regulatory requirements of 10 CFR 50.59" the "record of changes" is already addressed (i.e., 10CFR 50.59(d)). The editorial deletion avoids potential confusion.

[9] The optional reference to "and Channel Operational Test" is eliminated as not applicable to the ESBWR GTS. In a generic presentation of the SCP potentially applicable to other vendor's with a Channel Operational Test, it could be retained at this location.

DCD Impact

DCD Tier 2, Chapter 16, Specification 5.5.11 will be revised as shown in Enclosure 2.

Enclosure 2

MFN 08-104 Supplement 1

DCD Markups for

RAI Number 16.2-156 S01

5.5 Programs and Manuals

5.5.10 Battery Monitoring and Maintenance Program

This Program provides for battery restoration and maintenance, which includes the following:

COL 16.0-1-A
5.5.10-1

a. With battery cell float voltage < [2.18] V, actions to restore cell(s) to ≥ [2.18] V and perform SR 3.8.3.5, and

b. Actions to determine the cause and correct when cell temperatures deviate more than 3°C (5°F) from each other.

5.5.11 Setpoint Control Program (SCP)

a. The Setpoint Control Program (SCP) implements the regulatory requirement of 10 CFR 50.36(d)(1)(ii)(A) that technical specifications will include items in the category of limiting safety system settings (LSSS), which are settings for automatic protective devices related to those variables having significant safety functions.

b. The Limiting Trip Setpoint (LTSP), Nominal Trip Setpoint ($NTSP_F$), Allowable Value (AV), As-Found Tolerance (AFT), and As-Left Tolerance (ALT) for each Technical Specification required automatic protection instrumentation function shall be calculated in conformance with the instrumentation setpoint methodology previously reviewed and approved by the NRC in NEDE- 33304P-A, "GEH ABWR/ESBWR Setpoint Methodology," [Revision #, dated Month dd, yyyy, (MLxxxxxxxxx)], and the conditions stated in the associated NRC safety evaluation, [Letter to GEH from NRC, Title, dated Month, dd, yyyy, (MLxxxxxxxxx)].

COL 16.0-2-H
5.5.11-1

c. For each Technical Specification required automatic protection instrumentation function, performance of a CHANNEL CALIBRATION surveillance shall include the following:

1. The as-found value of the instrument channel trip setting shall be compared with the previous as-left value or the specified $NTSP_F$.

i. If the as-found value of the instrument channel trip setting differs from the previous as-left value or the specified $NTSP_F$ by more than the pre-defined test acceptance criteria band (i.e., the specified AFT), then ~~this condition~~ the instrument channel shall be ~~trended and~~ evaluated ~~within the plant's corrective action program, to verify that it is functioning in accordance with its design basis~~ before declaring the surveillance requirement met and returning the instrument channel to service. This condition shall be dispositioned by the plant's corrective action program.

Enclosure 3

MFN 08-104 Supplement 1

Comparison to
Example Setpoint Control Program Specification

RAI Number 16.2-156 S01

Example Setpoint Control Program Specification (RAI 16.2-156 Supplement 1)
{from NRC RAI Letter No. 188 Enclosure 2}

5.0 ADMINISTRATIVE CONTROLS

5.5 Programs and Manuals

The following programs shall be established, implemented, and maintained.

5.5.11 Setpoint Control Program

a. The Setpoint Control Program (SCP) implements the regulatory requirement of 10 CFR 50.36(d)(1)(ii)(A) that technical specifications will include items in the category of limiting safety system settings (LSSS), which are settings for automatic protective devices related to those variables having significant safety functions.

b. The Limiting Trip Setpoint (LTSP), Nominal Trip Setpoint ($NTSP_F$), Allowable Value (AV), As-Found Tolerance (AFT), and As-Left Tolerance (ALT) for each Technical Specification required automatic protection instrumentation function shall be calculated in conformance with the instrumentation setpoint methodology previously reviewed and approved by the NRC in NEDE-33304-P-A, "GEH ABWR/ESBWR Setpoint Methodology," [Revision #, dated Month dd, yyyy, (MLxxxxxxxxx)], and the conditions stated in the associated NRC safety evaluation, [Letter to GEH from NRC, Title, dated Month, dd, yyyy, (MLxxxxxxxxx)].

1

c. For each Technical Specification required automatic protection instrumentation function, Pperformance of a CHANNEL CALIBRATION ~~and a CHANNEL OPERATIONAL TEST~~ surveillance shall include the following:

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~~1. The as-left value of the instrument channel trip setting shall be the value at which the channel was set at the completion of the surveillance with no additional adjustment of the instrument channel. The as-found value of the instrument channel trip setting shall be the trip setting value measured during the subsequent performance of the surveillance before making any adjustment to the instrument channel that could change the trip setting value.~~

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1~~2~~. The as-found value of the instrument channel trip setting shall be compared with the previous as-left value or the specified NTSP. ~~If the as-found value is compared with the specified NTSP to meet this requirement, the following conditions apply:~~

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~~i. the setting tolerance band (the specified ALT) must be less than or equal to the square root of the sum of the squares of reference accuracy, measurement and test equipment, and readability uncertainties;~~

~~ii. the setting tolerance band (the specified ALT) must be included in the total loop uncertainty; and~~

~~iii. the pre-defined test acceptance criteria band (the specified AFT) for the as-found value must include either the setting tolerance band (the specified ALT) or the uncertainties associated with the setting tolerance band (the specified ALT), but not both of these.~~

~~3.~~ i. If the as-found value of the instrument channel trip setting differs from the previous as-left value or the specified $NTSP_F$ by more than the pre-defined test acceptance criteria band (i.e., the specified AFT), ~~when compared in accordance with paragraph c.2 above, then this condition shall be dispositioned by the plant's corrective action program, and~~ then the instrument channel shall be evaluated ~~to verify that it is functioning in accordance with its design basis~~ before declaring the surveillance requirement met and returning the instrument channel to service. This condition shall be dispositioned by the plant's corrective action program.

4

~~4.~~ ii. If the as-found value of the instrument channel trip setting is less conservative than the specified AV, then until 5.5.11.c.1.i and 5.5.11.c.2 are met, the surveillance requirement is not met and the instrument channel shall be immediately declared inoperable.

5

~~5.~~2. The instrument channel trip setting shall be set to a value within the specified ALT around the specified $NTSP_F$ ~~(a trip setting as or more conservative than the specified LTSP)~~ at the completion of the surveillance; otherwise, the surveillance requirement is not met and the instrument channel shall be immediately declared inoperable.

6

~~d. The difference between the instrument channel trip setting as-found value and either the previous as-left value or the specified NTSP, for each Technical Specification required automatic protection instrumentation function shall be trended and evaluated to verify that the instrument channel is functioning in accordance with its design basis.~~

7

~~e~~d. The SCP shall establish a document containing the current value of the specified LTSP, $NTSP_F$, AV, AFT, and ALT for each Technical Specification required automatic protection instrumentation function~~, a record of changes to those values,~~ and references to the calculation documentation. Changes to this document shall be governed by the regulatory requirements of 10 CFR 50.59.

8

REVIEWER'S NOTE:

The referenced NRC approved setpoint methodology shall meet the following guidance, and shall be applicable to Technical Specification required automatic protection instrumentation function surveillances that require verification that setpoints (or channel outputs) are within the necessary range and accuracy (e.g., CHANNEL CALIBRATIONS) [[and Channel Operational Tests]][[*NOTE: Would not include COT phrase in ESBWR Reviewer's NOTE -- here to indicate generic presentation to NRC only*]]

9

1. The methodology allows little variation in the values calculated by different analysts using identical input values (such as uncertainties and channel calibration drift)

2. The as-left value of the instrument channel trip setting shall be the value at which the channel was set at the completion of the surveillance with no additional adjustment of the instrument channel.

3. The as-found value of the instrument channel trip setting shall be the trip setting value measured during the subsequent performance of the surveillance before making any adjustment to the instrument channel that could change the trip setting value.

4. If the requirements of 5.5.11.c.1 include an allowance for the as-found value to be compared with the specified NTSP, the following conditions shall be applied:

   a. The setting tolerance band (i.e., the specified ALT) must be less than or equal to the square root of the sum of the squares of reference accuracy, measurement and test equipment errors, and readability uncertainties;

   b. The setting tolerance band (i.e., the specified ALT) must be included in the total loop uncertainty; and

   c. the pre-defined test acceptance criteria band (i.e., the specified AFT) for the as-found value must include either the setting tolerance band (the specified ALT) or the uncertainties associated with the setting tolerance band (the specified ALT), but not both of these.

Additionally, the COL Holder shall commit to the following:

When the difference between the instrument channel trip setting as-found value and either the previous as-left value or the specified $NTSP_F$ differ by more than the pre-defined test acceptance criteria band (i.e., the specified AFT) for each Technical Specification required automatic protection instrumentation function, the results shall be trended and evaluated to verify that the instrument channel is functioning in accordance with its design basis.