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ATTENTION: "REPLACE" directions do not affect the Table of Contents, Therefore no TOC will be issued with the updated material.

TSB1 - TECHNICAL SPECIFICATION BASES UNIT 1 MANUAL

REMOVE MANUAL TABLE OF CONTENTS DATE: 01/19/2009

ADD MANUAL TABLE OF CONTENTS DATE: 01/30/2009

CATEGORY: DOCUMENTS TYPE: TSB1

4001
HRR

ID: TEXT 3.1.4

ADD: REV: 4

REMOVE: REV:3

CATEGORY: DOCUMENTS TYPE: TSB1

ID: TEXT LOES

REMOVE: REV:90

ADD: REV: 91

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SSES MANUAL

Manual Name: TSB1

Manual Title: TECHNICAL SPECIFICATION BASES UNIT 1 MANUAL

Table Of Contents

Issue Date: 01/30/2009

<u>Procedure Name</u>	<u>Rev</u>	<u>Issue Date</u>	<u>Change ID</u>	<u>Change Number</u>
TEXT LOES	91	01/30/2009		
Title: LIST OF EFFECTIVE SECTIONS				
TEXT TOC	16	10/27/2008		
Title: TABLE OF CONTENTS				
TEXT 2.1.1	4	04/23/2008		
Title: SAFETY LIMITS (SLS) REACTOR CORE SLS				
TEXT 2.1.2	1	10/04/2007		
Title: SAFETY LIMITS (SLS) REACTOR COOLANT SYSTEM (RCS) PRESSURE S				
TEXT 3.0	2	10/12/2006		
Title: LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY				
TEXT 3.1.1	1	04/18/2006		
Title: REACTIVITY CONTROL SYSTEMS SHUTDOWN MARGIN (SDM)				
TEXT 3.1.2	0	11/15/2002		
Title: REACTIVITY CONTROL SYSTEMS REACTIVITY ANOMALIES				
TEXT 3.1.3	2	01/19/2009		
Title: REACTIVITY CONTROL SYSTEMS CONTROL ROD OPERABILITY				
TEXT 3.1.4	4	01/30/2009		
Title: REACTIVITY CONTROL SYSTEMS CONTROL ROD SCRAM TIMES				
TEXT 3.1.5	1	07/06/2005		
Title: REACTIVITY CONTROL SYSTEMS CONTROL ROD SCRAM ACCUMULATORS				
TEXT 3.1.6	2	04/18/2006		
Title: REACTIVITY CONTROL SYSTEMS ROD PATTERN CONTROL				

SSES MANUAL

Manual Name: TSB1

Manual Title: TECHNICAL SPECIFICATION BASES UNIT 1 MANUAL

TEXT 3.1.7 .3 04/23/2008

Title: REACTIVITY CONTROL SYSTEMS STANDBY LIQUID CONTROL (SLC) SYSTEM

TEXT 3.1.8 2 10/04/2007

Title: REACTIVITY CONTROL SYSTEMS SCRAM DISCHARGE VOLUME (SDV) VENT AND DRAIN VALVES

TEXT 3.2.1 2 04/23/2008

Title: POWER DISTRIBUTION LIMITS AVERAGE PLANAR LINEAR HEAT GENERATION RATE (APLHGR)

TEXT 3.2.2 2 04/23/2008

Title: POWER DISTRIBUTION LIMITS MINIMUM CRITICAL POWER RATIO (MCPR)

TEXT 3.2.3 2 04/23/2008

Title: POWER DISTRIBUTION LIMITS LINEAR HEAT GENERATION RATE (LHGR)

TEXT 3.3.1.1 4 04/23/2008

Title: INSTRUMENTATION REACTOR PROTECTION SYSTEM (RPS) INSTRUMENTATION

TEXT 3.3.1.2 2 01/19/2009

Title: INSTRUMENTATION SOURCE RANGE MONITOR (SRM) INSTRUMENTATION

TEXT 3.3.2.1 3 04/23/2008

Title: INSTRUMENTATION CONTROL ROD BLOCK INSTRUMENTATION

TEXT 3.3.2.2 1 04/23/2008

Title: INSTRUMENTATION FEEDWATER MAIN TURBINE HIGH WATER LEVEL TRIP INSTRUMENTATION

TEXT 3.3.3.1 8 10/27/2008

Title: INSTRUMENTATION POST ACCIDENT MONITORING (PAM) INSTRUMENTATION

TEXT 3.3.3.2 1 04/18/2005

Title: INSTRUMENTATION REMOTE SHUTDOWN SYSTEM

TEXT 3.3.4.1 1 04/23/2008

Title: INSTRUMENTATION END OF CYCLE RECIRCULATION PUMP TRIP (EOC-RPT) INSTRUMENTATION

SSS MANUAL

Manual Name: TSB1

Manual Title: TECHNICAL SPECIFICATION BASES UNIT 1 MANUAL

TEXT 3.3.4.2 0 11/15/2002

Title: INSTRUMENTATION ANTICIPATED TRANSIENT WITHOUT SCRAM RECIRCULATION PUMP TRIP
(ATWS-RPT) INSTRUMENTATION

TEXT 3.3.5.1 2 07/06/2005

Title: INSTRUMENTATION EMERGENCY CORE COOLING SYSTEM (ECCS) INSTRUMENTATION

TEXT 3.3.5.2 0 11/15/2002

Title: INSTRUMENTATION REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM INSTRUMENTATION

TEXT 3.3.6.1 4 04/23/2008

Title: INSTRUMENTATION PRIMARY CONTAINMENT ISOLATION INSTRUMENTATION

TEXT 3.3.6.2 3 10/27/2008

Title: INSTRUMENTATION SECONDARY CONTAINMENT ISOLATION INSTRUMENTATION

TEXT 3.3.7.1 2 10/27/2008

Title: INSTRUMENTATION CONTROL ROOM EMERGENCY OUTSIDE AIR SUPPLY (CREOAS) SYSTEM
INSTRUMENTATION

TEXT 3.3.8.1 2 12/17/2007

Title: INSTRUMENTATION LOSS OF POWER (LOP) INSTRUMENTATION

TEXT 3.3.8.2 0 11/15/2002

Title: INSTRUMENTATION REACTOR PROTECTION SYSTEM (RPS) ELECTRIC POWER MONITORING

TEXT 3.4.1 3 04/12/2006

Title: REACTOR COOLANT SYSTEM (RCS) RECIRCULATION LOOPS OPERATING

TEXT 3.4.2 1 04/23/2008

Title: REACTOR COOLANT SYSTEM (RCS) JET PUMPS

TEXT 3.4.3 2 04/23/2008

Title: REACTOR COOLANT SYSTEM RCS SAFETY RELIEF VALVES S/RVS

TEXT 3.4.4 0 11/15/2002

Title: REACTOR COOLANT SYSTEM (RCS) RCS OPERATIONAL LEAKAGE

SSES MANUAL

Manual Name: TSB1

Manual Title: TECHNICAL SPECIFICATION BASES UNIT 1 MANUAL

TEXT 3.4.5 1 01/16/2006 .

Title: REACTOR COOLANT SYSTEM (RCS) RCS PRESSURE ISOLATION VALVE (PIV) LEAKAGE

TEXT 3.4.6 1 04/18/2005

Title: REACTOR COOLANT SYSTEM (RCS) - RCS LEAKAGE DETECTION INSTRUMENTATION

TEXT 3.4.7 2 10/04/2007

Title: REACTOR COOLANT SYSTEM (RCS) RCS SPECIFIC ACTIVITY

TEXT 3.4.8 1 04/18/2005

Title: REACTOR COOLANT SYSTEM (RCS) RESIDUAL HEAT REMOVAL (RHR) SHUTDOWN COOLING SYSTEM
- HOT SHUTDOWN

TEXT 3.4.9 0 11/15/2002

Title: REACTOR COOLANT SYSTEM (RCS) RESIDUAL HEAT REMOVAL (RHR) SHUTDOWN COOLING SYSTEM
- COLD SHUTDOWN

TEXT 3.4.10 3 04/23/2008

Title: REACTOR COOLANT SYSTEM (RCS) RCS PRESSURE AND TEMPERATURE (P/T) LIMITS

TEXT 3.4.11 0 11/15/2002

Title: REACTOR COOLANT SYSTEM (RCS) REACTOR STEAM DOME PRESSURE

TEXT 3.5.1 2 01/16/2006

Title: EMERGENCY CORE COOLING SYSTEMS (ECCS) AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM ECCS - OPERATING

TEXT 3.5.2 0 11/15/2002

Title: EMERGENCY CORE COOLING SYSTEMS (ECCS) AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM ECCS - SHUTDOWN

TEXT 3.5.3 1 04/18/2005

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

TEXT 3.6.1.1 3 04/23/2008

Title: CONTAINMENT SYSTEMS PRIMARY CONTAINMENT

TEXT 3.6.1.2 1 04/23/2008

Title: CONTAINMENT SYSTEMS PRIMARY CONTAINMENT AIR LOCK

SSSES MANUAL

Manual Name: TSB1

Manual Title: TECHNICAL SPECIFICATION BASES UNIT 1 MANUAL

TEXT 3.6.1.3 8 04/23/2008
Title: CONTAINMENT SYSTEMS PRIMARY CONTAINMENT ISOLATION VALVES (PCIVS)
LDCN 3092

TEXT 3.6.1.4 1 04/23/2008
Title: CONTAINMENT SYSTEMS CONTAINMENT PRESSURE

TEXT 3.6.1.5 1 10/05/2005
Title: CONTAINMENT SYSTEMS DRYWELL AIR TEMPERATURE

TEXT 3.6.1.6 0 11/15/2002
Title: CONTAINMENT SYSTEMS SUPPRESSION CHAMBER-TO-DRYWELL VACUUM BREAKERS

TEXT 3.6.2.1 2 04/23/2008
Title: CONTAINMENT SYSTEMS SUPPRESSION POOL AVERAGE TEMPERATURE

TEXT 3.6.2.2 0 11/15/2002
Title: CONTAINMENT SYSTEMS SUPPRESSION POOL WATER LEVEL

TEXT 3.6.2.3 1 01/16/2006
Title: CONTAINMENT SYSTEMS RESIDUAL HEAT REMOVAL (RHR) SUPPRESSION POOL COOLING

TEXT 3.6.2.4 0 11/15/2002
Title: CONTAINMENT SYSTEMS RESIDUAL HEAT REMOVAL (RHR) SUPPRESSION POOL SPRAY

TEXT 3.6.3.1 2 06/13/2006
Title: CONTAINMENT SYSTEMS PRIMARY CONTAINMENT HYDROGEN RECOMBINERS

TEXT 3.6.3.2 1 04/18/2005
Title: CONTAINMENT SYSTEMS DRYWELL AIR FLOW SYSTEM

TEXT 3.6.3.3 0 11/15/2002
Title: CONTAINMENT SYSTEMS PRIMARY CONTAINMENT OXYGEN CONCENTRATION

TEXT 3.6.4.1 7 10/04/2007
Title: CONTAINMENT SYSTEMS SECONDARY CONTAINMENT

SSES MANUAL

Manual Name: TSB1

Manual Title: TECHNICAL SPECIFICATION BASES UNIT 1 MANUAL

TEXT 3.6.4.2 2 01/03/2005

Title: CONTAINMENT SYSTEMS SECONDARY CONTAINMENT ISOLATION VALVES (SCIIVS)

TEXT 3.6.4.3 4 09/21/2006

Title: CONTAINMENT SYSTEMS STANDBY GAS TREATMENT (SGT) SYSTEM

TEXT 3.7.1 1 12/17/2007

Title: PLANT SYSTEMS RESIDUAL HEAT REMOVAL SERVICE WATER (RHRSW) SYSTEM AND THE ULTIMATE HEAT SINK (UHS)

TEXT 3.7.2 1 11/09/2004

Title: PLANT SYSTEMS EMERGENCY SERVICE WATER (ESW) SYSTEM

TEXT 3.7.3 0 11/15/2002

Title: PLANT SYSTEMS CONTROL ROOM EMERGENCY OUTSIDE AIR SUPPLY (CREOAS) SYSTEM

TEXT 3.7.4 0 11/15/2002

Title: PLANT SYSTEMS CONTROL ROOM FLOOR COOLING SYSTEM

TEXT 3.7.5 1 10/04/2007

Title: PLANT SYSTEMS MAIN CONDENSER OFFGAS

TEXT 3.7.6 2 04/23/2008

Title: PLANT SYSTEMS MAIN TURBINE BYPASS SYSTEM

TEXT 3.7.7 1 10/04/2007

Title: PLANT SYSTEMS SPENT FUEL STORAGE POOL WATER LEVEL

TEXT 3.7.8 0 04/23/2008

Title: PLANT SYSTEMS

TEXT 3.8.1 5 12/17/2007

Title: ELECTRICAL POWER SYSTEMS AC SOURCES - OPERATING

TEXT 3.8.2 0 11/15/2002

Title: ELECTRICAL POWER SYSTEMS AC SOURCES - SHUTDOWN

TSSES MANUAL

Manual Name: TSB1

Manual Title: TECHNICAL SPECIFICATION BASES UNIT 1 MANUAL

TEXT 3.8.3 1 04/23/2008
Title: ELECTRICAL POWER SYSTEMS DIESEL FUEL OIL, LUBE OIL, AND STARTING AIR

TEXT 3.8.4 3 01/19/2009
Title: ELECTRICAL POWER SYSTEMS DC SOURCES - OPERATING

TEXT 3.8.5 1 12/14/2006
Title: ELECTRICAL POWER SYSTEMS DC SOURCES - SHUTDOWN

TEXT 3.8.6 1 12/14/2006
Title: ELECTRICAL POWER SYSTEMS BATTERY CELL PARAMETERS

TEXT 3.8.7 1 10/05/2005
Title: ELECTRICAL POWER SYSTEMS DISTRIBUTION SYSTEMS - OPERATING

TEXT 3.8.8 0 11/15/2002
Title: ELECTRICAL POWER SYSTEMS DISTRIBUTION SYSTEMS - SHUTDOWN

TEXT 3.9.1 0 11/15/2002
Title: REFUELING OPERATIONS REFUELING EQUIPMENT INTERLOCKS

TEXT 3.9.2 0 11/15/2002
Title: REFUELING OPERATIONS REFUEL POSITION ONE-ROD-OUT INTERLOCK

TEXT 3.9.3 0 11/15/2002
Title: REFUELING OPERATIONS CONTROL ROD POSITION

TEXT 3.9.4 0 11/15/2002
Title: REFUELING OPERATIONS CONTROL ROD POSITION INDICATION

TEXT 3.9.5 0 11/15/2002
Title: REFUELING OPERATIONS CONTROL ROD OPERABILITY - REFUELING

TEXT 3.9.6 1 10/04/2007
Title: REFUELING OPERATIONS REACTOR PRESSURE VESSEL (RPV) WATER LEVEL

SSSES MANUAL

Manual Name: TSB1

Manual Title: TECHNICAL SPECIFICATION BASES UNIT 1 MANUAL

TEXT 3.9.7 0 11/15/2002
Title: REFUELING OPERATIONS RESIDUAL HEAT REMOVAL (RHR) - HIGH WATER LEVEL

TEXT 3.9.8 0 11/15/2002
Title: REFUELING OPERATIONS RESIDUAL HEAT REMOVAL (RHR) - LOW WATER LEVEL

TEXT 3.10.1 1 01/23/2008
Title: SPECIAL OPERATIONS INSERVICE LEAK AND HYDROSTATIC TESTING OPERATION

TEXT 3.10.2 0 11/15/2002
Title: SPECIAL OPERATIONS REACTOR MODE SWITCH INTERLOCK TESTING

TEXT 3.10.3 0 11/15/2002
Title: SPECIAL OPERATIONS SINGLE CONTROL ROD WITHDRAWAL - HOT SHUTDOWN

TEXT 3.10.4 0 11/15/2002
Title: SPECIAL OPERATIONS SINGLE CONTROL ROD WITHDRAWAL - COLD SHUTDOWN

TEXT 3.10.5 0 11/15/2002
Title: SPECIAL OPERATIONS SINGLE CONTROL ROD DRIVE (CRD) REMOVAL - REFUELING

TEXT 3.10.6 0 11/15/2002
Title: SPECIAL OPERATIONS MULTIPLE CONTROL ROD WITHDRAWAL - REFUELING

TEXT 3.10.7 1 04/18/2006
Title: SPECIAL OPERATIONS CONTROL ROD TESTING - OPERATING

TEXT 3.10.8 1 04/12/2006
Title: SPECIAL OPERATIONS SHUTDOWN MARGIN (SDM) TEST - REFUELING

SUSQUEHANNA STEAM ELECTRIC STATION
LIST OF EFFECTIVE SECTIONS (TECHNICAL SPECIFICATIONS BASES)

<u>Section</u>	<u>Title</u>	<u>Revision</u>
TOC	Table of Contents	16
B 2.0	SAFETY LIMITS BASES	
	Page B 2.0-1	0
	Page TS / B 2.0-2	3
	Page TS / B 2.0-3	5
	Page TS / B 2.0-4	3
	Page TS / B 2.0-5	4
	Page TS / B 2.0-6	1
	Pages TS / B 2.0-7 through TS / B 2.0-9	1
B 3.0	LCO AND SR APPLICABILITY BASES	
	Page TS / B 3.0-1	1
	Pages TS / B 3.0-2 through TS / B 3.0-4	0
	Pages TS / B 3.0-5 through TS / B 3.0-7	1
	Pages TS / B 3.0-8 through TS / B 3.0-9	2
	Page TS / B 3.0-10	1
	Page TS / B 3.0-11	2
	Page TS / B 3.0-11a	0
	Page TS / B 3.0-12	1
	Pages TS / B 3.0-13 through TS / B 3.0-15	2
	Pages TS / B 3.0-16 and TS / B 3.0-17	0
B 3.1	REACTIVITY CONTROL BASES	
	Pages B 3.1-1 through B 3.1-4	0
	Page TS / B 3.1-5	1
	Pages TS / B 3.1-6 and TS / B 3.1-7	2
	Pages B 3.1-8 through B 3.1-13	0
	Page TS / B 3.1-14	1
	Page B 3.1-15	0
	Page TS / B 3.1-16	1
	Pages B 3.1-17 through B 3.1-19	0
	Pages TS / B 3.1-20 and TS / B 3.1-21	1
	Page TS / B 3.1-22	0
	Page TS / B 3.1-23	1
	Page TS / B 3.1-24	0
	Pages TS / B 3.1-25 through TS / B 3.1-27	1
	Page TS / B 3.1-28	2
	Page TS / B 3.1-29	1
	Pages B 3.1-30 through B 3.1-33	0
	Pages TS / B 3.1-34 through TS / B 3.1-36	1
	Pages TS / B 3.1-37 and TS / B 3.1-38	2
	Page TS / B 3.1-39 and TS / B 3.1-40	2
	Page TS / B 3.1.40a	0
	Pages TS / B 3.1.41 and TS / B 3.1-42	2

SUSQUEHANNA STEAM ELECTRIC STATION
LIST OF EFFECTIVE SECTIONS (TECHNICAL SPECIFICATIONS BASES)

<u>Section</u>	<u>Title</u>	<u>Revision</u>
	Page TS / B 3.1.43	1
	Page TS / B 3.1-44	0
	Page TS / B 3.1-45	3
	Pages TS / B 3.1-46 through TS / B 3.1-49	1
	Page TS / B 3.1-50	0
	Page TS / B 3.1-51	2
B 3.2	POWER DISTRIBUTION LIMITS BASES	
	Page TS / B 3.2-1	2
	Pages TS / B 3.2-2 and TS / B 3.2-3	3
	Pages TS / B 3.2-4 and TS / B 3.2-5	2
	Page TS / B 3.2-6	3
	Page B 3.2-7	1
	Page TS / B 3.2-8	3
	Pages TS / B 3.2-9 and TS / B 3.2.10	2
	Page TS / B 3.2-11	3
	Page TS / B 3.2-12	1
	Page TS / B 3.2-13	2
B 3.3	INSTRUMENTATION	
	Pages TS / B 3.3-1 through TS / B 3.3-4	1
	Page TS / B 3.3-5	2
	Page TS / B 3.3-6	1
	Page TS / B 3.3-7	3
	Page TS / B 3.3-7a	1
	Page TS / B 3.3-8	4
	Pages TS / B 3.3-9 through TS / B 3.3-12	3
	Pages TS / B 3.3-12a	1
	Pages TS / B 3.3-12b and TS / B 3.3-12c	0
	Page TS / B 3.3-13	1
	Page TS / B 3.3-14	3
	Pages TS / B 3.3-15 and TS / B 3.3-16	1
	Pages TS / B 3.3-17 and TS / B 3.3-18	4
	Page TS / B 3.3-19	1
	Pages TS / B 3.3-20 through TS / B 3.3-22	2
	Page TS / B 3.3-22a	0
	Pages TS / B 3.3-23 and TS / B 3.3-24	2
	Pages TS / B 3.3-24a and TS / B 3.3-24b	0
	Page TS / B 3.3-25	3
	Page TS / B 3.3-26	2
	Page TS / B 3.3-27	1
	Pages TS / B 3.3-28 through TS / B 3.3-30	3
	Page TS / B 3.3-30a	0

SUSQUEHANNA STEAM ELECTRIC STATION
LIST OF EFFECTIVE SECTIONS (TECHNICAL SPECIFICATIONS BASES)

<u>Section</u>	<u>Title</u>	<u>Revision</u>
	Page TS / B 3.3-31	4
	Page TS / B 3.3-32	5
	Pages TS / B 3.3-32a	0
	Page TS / B 3.3-32b	1
	Page TS / B 3.3-33	5
	Page TS / B 3.3-33a	0
	Page TS / B 3.3-34	1
	Pages TS / B 3.3-35 and TS / B 3.3-36	2
	Pages TS / B 3.3-37 and TS / B 3.3-38	1
	Page TS / B 3.3-39	2
	Pages TS / B 3.3-40 through TS / B 3.3-43	1
	Page TS / B 3.3-44	4
	Pages TS / B 3.3-44a and TS / B 3.3-44b	0
	Page TS / B 3.3-45	3
	Pages TS / B 3.3-45a and TS / B 3.3-45b	0
	Page TS / B 3.3-46	3
	Pages TS / B 3.3-47	2
	Pages TS / B 3.3-48 through TS / B 3.3-51	3
	Pages TS / B 3.3-52 and TS / B 3.3-53	2
	Page TS / B 3.3-53a	0
	Page TS / B 3.3-54	4
	Page B 3.3-55	1
	Page B 3.3-56	0
	Page B 3.3-57	1
	Page B 3.3-58	0
	Page B 3.3-59	1
	Pages B 3.3-60 through B 3.3-63	0
	Pages TS / B 3.3-64 and TS / B 3.3-65	2
	Page TS / B 3.3-66	4
	Page TS / B 3.3-67	3
	Page TS / B 3.3-68	4
	Page TS / B 3.3-69	5
	Pages TS / B 3.3-70	4
	Page TS / B 3.3-71	3
	Pages TS / B 3.3-72 and TS / B 3.3-73	2
	Page TS / B 3.3-74	3
	Page TS / B 3.3-75	2
	Page TS / B 3.3-75a	6
	Page TS / B 3.3-75b	7
	Page TS / B 3.3-75c	5
	Pages B 3.3-76 through 3.3-77	0
	Page TS / B 3.3-78	1
	Pages B 3.3-79 through B 3.3-81	0
	Page B 3.3-82	1
	Page B 3.3-83	0
	Pages B 3.3-84 and B 3.3-85	1

SUSQUEHANNA STEAM ELECTRIC STATION
LIST OF EFFECTIVE SECTIONS (TECHNICAL SPECIFICATIONS BASES)

<u>Section</u>	<u>Title</u>	<u>Revision</u>
	Page B 3.3-86	0
	Page B 3.3-87	1
	Page B 3.3-88	0
	Page B 3.3-89	1
	Page TS / B 3.3-90	1
	Page B 3.3-91	0
	Pages TS / B 3.3-92 through TS / B 3.3-100	1
	Pages B 3.3-101 through B 3.3-103	0
	Page TS / B 3.3-104	1
	Pages B 3.3-105 and B 3.3-106	0
	Page TS / B 3.3-107	1
	Page B 3.3-108	0
	Page TS / B 3.3-109	1
	Pages B 3.3-110 and B 3.3-111	0
	Pages TS / B 3.3-112 and TS / B 3.3-112a	1
	Pages TS / B 3.3-113 through TS / B 3.3-115	1
	Page TS / B 3.3-116	2
	Page TS / B 3.3-117	1
	Pages B 3.3-118 through B 3.3-122	0
	Pages TS / B 3.3-123 and TS / B 3.3-124	1
	Page TS / B 3.3-124a	0
	Page B 3.3-125	0
	Pages TS / B 3.3-126 and TS / B 3.3-127	1
	Pages B 3.3-128 through B 3.3-130	0
	Page TS / B 3.3-131	1
	Pages B 3.3-132 through B 3.3-137	0
	Page TS / B 3.3-138	1
	Pages B 3.3-139 through B 3.3-149	0
	Pages TS / B 3.3-150 and TS / B 3.3-151	1
	Pages TS / B 3.3-152 through TS / B 3.3-154	2
	Page TS / B 3.3-155	1
	Pages TS / B 3.3-156 through TS / B 3.3-158	2
	Pages TS / B 3.3-159 through TS / B 3.3-162	1
	Page TS / B 3.3-163	2
	Pages TS / B 3.3-164 and TS / B 3.3-165	1
	Pages TS / B 3.3-166 and TS / B 3.3-167	2
	Pages TS / B 3.3-168 and TS / B 3.3-169	1
	Page TS / B 3.3-170	2
	Pages TS / B 3.3-171 through TS / B 3.3-177	1
	Pages TS / B 3.3-178 through TS / B 3.3-179a	2
	Pages TS / B 3.3-179b and TS / B 3.3-179c	0
	Page TS / B 3.3-180	1
	Page TS / B 3.3-181	3
	Page TS / B 3.3-182	1
	Page TS / B 3.3-183	2
	Page TS / B 3.3-184	1

SUSQUEHANNA STEAM ELECTRIC STATION
LIST OF EFFECTIVE SECTIONS (TECHNICAL SPECIFICATIONS BASES)

<u>Section</u>	<u>Title</u>	<u>Revision</u>
	Page TS / B 3.3-185	3
	Page TS / B 3.3-186	1
	Pages TS / B 3.3-187 and TS / B 3.3-188	2
	Pages TS / B 3.3-189 through TS / B 3.3-191	1
	Page TS / B 3.3-192	0
	Page TS / B 3.3-193	1
	Pages TS / B 3.3-194 and TS / B 3.3-195	0
	Page TS / B 3.3-196	2
	Pages TS / B 3.3-197 through TS / B 3.3-204	0
	Page TS / B 3.3-205	1
	Pages B 3.3-206 through B 3.3-209	0
	Page TS / B 3.3-210	1
	Pages B 3.3-211 through B 3.3-219	0
B 3.4	REACTOR COOLANT SYSTEM BASES	
	Pages B 3.4-1 and B 3.4-2	0
	Pages TS / B 3.4-3 and Page TS / B 3.4-4	4
	Pages TS / B 3.4-5 through TS / B 3.4-9	2
	Pages B 3.4-10 through B 3.4-12	0
	Page B 3.4-13	1
	Page B 3.4-14	0
	Page TS / B 3.4-15	2
	Pages TS / B 3.4-16 and TS / B 3.4-17	3
	Page TS / B 3.4-18	2
	Pages B 3.4-19 through B 3.4-27	0
	Pages TS / B 3.4-28 and TS / B 3.4-29	1
	Pages B 3.4-30 and B 3.4-31	0
	Page TS / B 3.4-32	1
	Pages B 3.4-33 and B 3.4-34	0
	Pages TS / B 3.4-35 and TS / B 3.4-36	1
	Page TS / B 3.4-37	2
	Page TS / B 3.4-38	1
	Pages B 3.4-39 and B 3.4-40	0
	Page TS / B 3.4-41	1
	Pages B 3.4-42 through B 3.4-48	0
	Page TS / B 3.4-49	3
	Page TS / B 3.4-50	1
	Page TS / B 3.4-51	3
	Page TS / B 3.4-52	2
	Page TS / B 3.4-53	1
	Pages TS / B 3.4-54 through TS / B 3.4-56	2
	Page TS / B 3.4-57	3
	Pages TS / B 3.4-58 through TS / B 3.4-60	1

SUSQUEHANNA STEAM ELECTRIC STATION
LIST OF EFFECTIVE SECTIONS (TECHNICAL SPECIFICATIONS BASES)

<u>Section</u>	<u>Title</u>	<u>Revision</u>
B 3.5	ECCS AND RCIC BASES	
	Pages B 3.5-1 and B 3.5-2	0
	Page TS / B 3.5-3	2
	Page TS / B 3.5-4	1
	Page TS / B 3.5-5	2
	Page TS / B 3.5-6	1
	Pages B 3.5-7 through B 3.5-10	0
	Page TS / B 3.5-11	1
	Page TS / B 3.5-12	0
	Page TS / B 3.5-13	1
	Pages TS / B 3.5-14 and TS / B 3.5-15	0
	Pages TS / B 3.5-16 through TS / B 3.5-18	1
	Pages B 3.5-19 through B 3.5-24	0
	Page TS / B 3.5-25	1
	Pages TS / B 3.5-26 and TS / B 3.5-27	1
	Pages B 3.5-28 through B 3.5-31	0
B 3.6	CONTAINMENT SYSTEMS BASES	
	Page TS / B 3.6-1	2
	Page TS / B 3.6-1a	3
	Page TS / B 3.6-2	4
	Page TS / B 3.6-3	3
	Page TS / B 3.6-4	4
	Pages TS / B 3.6-5 and TS / B 3.6-6	3
	Pages TS / B 3.6-6a and TS / B 3.6-6b	2
	Page TS / B 3.6-6c	0
	Pages B 3.6-7	0
	Page B 3.6-8	1
	Pages B 3.6-9 through B 3.6-14	0
	Page TS / B 3.6-15	2
	Page TS / B 3.6-15a	0
	Page TS / B 3.6-15b	2
	Pages TS / B 3.6-16 and TS / B 3.6-17	1
	Page TS / B 3.6-17a	0
	Pages TS / B 3.6-18 and TS / B 3.6-19	0
	Page TS / B 3.6-20	1
	Page TS / B 3.6-21	2
	Page TS / B 3.6-22	1
	Page TS / B 3.6-22a	0
	Page TS / B 3.6-23	1
	Pages TS / B 3.6-24 and TS / B 3.6-25	0
	Pages TS / B 3.6-26 and TS / B 3.6-27	2
	Page TS / B 3.6-28	7
	Page TS / B 3.6-29	2
	Page TS / B 3.6-30	1

SUSQUEHANNA STEAM ELECTRIC STATION
LIST OF EFFECTIVE SECTIONS (TECHNICAL SPECIFICATIONS BASES)

<u>Section</u>	<u>Title</u>	<u>Revision</u>
	Page TS / B 3.6-31	3
	Page TS / B 3.6-32	0
	Page TS / B 3.6-33	1
	Pages TS / B 3.6-34 and TS / B 3.6-35	0
	Page TS / B 3.6-36	1
	Page TS / B 3.6-37	0
	Page TS / B 3.6-38	3
	Page TS / B 3.6-39	2
	Page TS / B 3.6-40	6
	Page B 3.6-41	1
	Pages B 3.6-42 and B 3.6-43	3
	Pages TS / B 3.6-44 and TS / B 3.6-45	1
	Page TS / B 3.6-46	2
	Pages TS / B 3.6-47 through TS / B 3.6-51	1
	Page TS / B 3.6-52	2
	Pages TS / B 3.6-53 through TS / B 3.6-56	0
	Page TS / B 3.6-57	1
	Page TS / 3.6-58	2
	Pages B 3.6-59 through B 3.6-63	0
	Pages TS / B 3.6-64 and TS / B 3.6-65	1
	Pages B 3.6-66 through B 3.6-69	0
	Pages TS / B 3.6-70 through TS / B 3.6-72	1
	Page TS / B 3.6-73	2
	Pages TS / B 3.6-74 and TS / B 3.6-75	1
	Pages B 3.6-76 and B 3.6-77	0
	Page TS / B 3.6-78	1
	Pages B 3.6-79 through B 3.3.6-83	0
	Page TS / B 3.6-84	3
	Page TS / B 3.6-85	2
	Page TS / B 3.6-86	4
	Pages TS / B 3.6-87 through TS / B 3.6-88a	2
	Page TS / B 3.6-89	4
	Page TS / B 3.6-90	2
	Page TS / B 3.6-91	3
	Pages TS / B 3.6-92 through TS / B 3.6-96	1
	Page TS / B 3.6-97	2
	Pages TS / B 3.6-98 and TS / B 3.6-99	1
	Page TS / B 3.6-100	2
	Pages TS / B 3.6-101 and TS / B 3.6-102	1
	Pages TS / B 3.6-103 and TS / B 3.6-104	2
	Page TS / B 3.6-105	3
	Page TS / B 3.6-106	2
	Page TS / B 3.6-107	3

SUSQUEHANNA STEAM ELECTRIC STATION
LIST OF EFFECTIVE SECTIONS (TECHNICAL SPECIFICATIONS BASES)

<u>Section</u>	<u>Title</u>	<u>Revision</u>
B 3.7	PLANT SYSTEMS BASES	
	Pages TS / B 3.7-1	3
	Page TS / B 3.7-2	4
	Pages TS / B 3.7-3 through TS / B 3.7-5	3
	Page TS / B 3.7-5a	0
	Pages TS / B 3.7-6 and TS / B 3.7-6a	2
	Pages TS / B 3.7-6b and TS / B 3.7-6c	1
	Page TS / B 3.7-7	3
	Page TS / B 3.7-8	2
	Pages TS / B 3.7-9 through TS / B 3.7-13	1
	Pages TS / B 3.7-14 through TS / B 3.7-18	2
	Page TS / B 3.7-18a	0
	Pages TS / B 3.7-19 through TS / B 3.7-23	1
	Page TS / B 3.7-24	1
	Pages TS / B 3.7-25 and TS / B 3.7-26	0
	Pages TS / B 3.7-27 through TS / B 3.7-29	5
	Page TS / B 3.7-30	2
	Page TS / B 3.7-31	1
	Page TS / B 3.7-32	0
	Page TS / B 3.7-33	1
	Pages TS / B 3.7-34 through TS / B 3.7-37	0
B 3.8	ELECTRICAL POWER SYSTEMS BASES	
	Pages TS / B 3.8-1 through TS / B 3.8-3	2
	Page TS / B 3.8-4	3
	Pages TS / B 3.8-4a and TS / B 3.8-4b	0
	Page TS / B 3.8-5	5
	Page TS / B 3.8-6	3
	Pages TS / B 3.8-7 through TS/B 3.8-8	2
	Page TS / B 3.8-9	4
	Page TS / B 3.8-10	3
	Pages TS / B 3.8-11 and TS / B 3.8-17	2
	Page TS / B 3.8-18	3
	Pages TS / B 3.8-19 through TS / B 3.8-21	2
	Pages TS / B 3.8-22 and TS / B 3.8-23	3
	Pages TS / B 3.8-24 through TS / B 3.8-37	2
	Pages B 3.8-38 through B 3.8-44	0
	Page TS / B 3.8-45	1
	Pages TS / B 3.8-46 through B 3.8-48	0
	Page TS / B 3.8-49	1
	Pages B 3.8-50 through B 3.8-53	0
	Pages TS / B 3.8-54 through TS / B 3.8-57	2
	Pages TS / B 3.8-58 through TS / B 3.8-61	3
	Pages TS / B 3.8-62 and TS / B 3.8-63	5
	Page TS / B 3.8-64	4

SUSQUEHANNA STEAM ELECTRIC STATION
LIST OF EFFECTIVE SECTIONS (TECHNICAL SPECIFICATIONS BASES)

<u>Section</u>	<u>Title</u>	<u>Revision</u>
	Page TS / B 3.8-65	5
	Pages TS / B 3.8-66 through TS / B 3.8-77	1
	Pages TS / B 3.8-77A through TS / B 3.8-77C	0
	Pages B 3.8-78 through B 3.8-80	0
	Page TS / B 3.8-81	1
	Pages B 3.8-82 through B 3.8-90	0
B 3.9	REFUELING OPERATIONS BASES	
	Pages TS / B 3.9-1 and TS / B 3.9-1a	1
	Pages TS / B 3.9-2 through TS / B 3.9-4	1
	Pages B 3.9-5 through B 3.9-18	0
	Pages TS / B 3.9-19 through TS / B 3.9-21	1
	Pages B 3.9-22 through B 3.9-30	0
B 3.10	SPECIAL OPERATIONS BASES	
	Page TS / B 3.10-1	2
	Pages TS / B 3.10-2 through TS / B 3.10-5	1
	Pages B 3.10-6 through B 3.10-31	0
	Page TS / B 3.10-32	2
	Page B 3.10-33	0
	Page TS / B 3.10-34	1
	Pages B 3.10-35 and B 3.10-36	0
	Page TS / B 3.10-37	1
	Page TS / B 3.10-38	2

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B 3.1 REACTIVITY CONTROL SYSTEMS

B 3.1.4 Control Rod Scram Times

BASES

BACKGROUND The scram function of the Control Rod Drive (CRD) System controls reactivity changes during abnormal operational transients to ensure that specified acceptable fuel design limits are not exceeded (Ref. 1). The control rods are scrammed by positive means using hydraulic pressure exerted on the CRD piston.

When a scram signal is initiated, control air is vented from the scram valves, allowing them to open by spring action. Opening the exhaust valve reduces the pressure above the main drive piston to atmospheric pressure, and opening the inlet valve applies the accumulator or reactor pressure to the bottom of the piston. Since the notches in the index tube are tapered on the lower edge, the collet fingers are forced open by cam action, allowing the index tube to move upward without restriction because of the high differential pressure across the piston. As the drive moves upward and the accumulator pressure reduces below the reactor pressure, a ball check valve opens, letting the reactor pressure complete the scram action. If the reactor pressure is low, such as during startup, the accumulator will fully insert the control rod in the required time without assistance from reactor pressure.

**APPLICABLE
SAFETY
ANALYSES** The analytical methods and assumptions used in evaluating the control rod scram function are presented in References 2, 3, and 4. The Design Basis Accident (DBA) and transient analyses assume that all of the control rods scram at a specified insertion rate. The resulting negative scram reactivity forms the basis for the determination of plant thermal limits (e.g., the MCPR). Other distributions of scram times (e.g., several control rods scramming slower than the average time with several control rods scramming faster than the average time) can also provide sufficient scram reactivity. Surveillance of each individual control rod's scram time ensures the scram reactivity assumed in the DBA and transient analyses can be met.

(continued)

BASES

APPLICABLE
SAFETY
ANALYSES
(continued)

The scram function of the CRD System protects the MCPR Safety Limit (SL) (see Bases for SL 2.1.1, "Reactor Core SLs," and LCO 3.2.2, "MINIMUM CRITICAL POWER RATIO (MCPR)") and the 1% cladding plastic strain fuel design limit (see Bases for LCO 3.2.3, "LINEAR HEAT GENERATION RATE (LHGR)" and LCO 3.2.4, "Average Power Range Monitor (APRM) Gain and Setpoints"), which ensure that no fuel damage will occur if these limits are not exceeded. Above 800 psig, the scram function is designed to insert negative reactivity at a rate fast enough to prevent the actual MCPR from becoming less than the MCPR SL, during the analyzed limiting power transient. Below 800 psig, the scram function is assumed to perform during the control rod drop accident and, therefore, also provides protection against violating fuel damage limits during reactivity insertion accidents (Ref. 5) (see Bases for LCO 3.1.6, "Rod Pattern Control"). For the reactor vessel overpressure protection analysis, the scram function, along with the safety/relief valves, ensure that the peak vessel pressure is maintained within the applicable ASME Code limits.

Control rod scram times satisfy Criterion 3 of the NRC Policy Statement (Ref. 6).

LCO

The scram times specified in Table 3.1.4-1 (in the accompanying LCO) are required to ensure that the scram reactivity assumed in the DBA and transient analysis is met (Ref. 7). To account for single failures and "slow" scrambling control rods, the scram times specified in Table 3.1.4-1 are faster than those assumed in the design basis analysis. The scram times have a margin that allows up to approximately 7% of the control rods (e.g., $185 \times 7\% \approx 13$) to have scram times exceeding the specified limits (i.e., "slow" control rods) including a single stuck control rod (as allowed by LCO 3.1.3, "Control Rod OPERABILITY") and an additional control rod failing to scram per the single failure criterion. The scram times are specified as a function of reactor steam dome pressure to account for the pressure dependence of the scram times. The scram times are specified relative to measurements based on reed switch positions, which provide the control rod position indication. The reed switch closes ("pickup") when the index tube passes a specific location and then opens ("dropout") as the index tube travels upward. Verification of the specified scram times in Table 3.1.4-1 is

(continued)

BASES

LCO
(continued)

accomplished through measurement of the "dropout" times. To ensure that local scram reactivity rates are maintained within acceptable limits, no more than one "slow" control rod may occupy a face or diagonally adjacent location to any other "slow" or stuck control rod.

Table 3.1.4-1 is modified by two Notes which state that control rods with scram times not within the limits of the table are considered "slow" and that control rods with scram times > 7 seconds are considered inoperable as required by SR 3.1.3.4.

This LCO applies only to OPERABLE control rods since inoperable control rods will be inserted and disarmed (LCO 3.1.3). Slow scrambling control rods may be conservatively declared inoperable and not accounted for as "slow" control rods.

APPLICABILITY

In MODES 1 and 2, a scram is assumed to function during transients and accidents analyzed for these plant conditions. These events are assumed to occur during startup and power operation; therefore, the scram function of the control rods is required during these MODES. In MODES 3 and 4, the control rods are not able to be withdrawn (except as permitted by LCO 3.10.3 and LCO 3.10.4) since the reactor mode switch is in shutdown and a control rod block is applied. This provides adequate requirements for control rod scram capability during these conditions. Scram requirements in MODE 5 are contained in LCO 3.9.5, "Control Rod OPERABILITY—Refueling."

ACTIONS

A.1

When the requirements of this LCO are not met, the rate of negative reactivity insertion during a scram may not be within the assumptions of the safety analyses. Therefore, 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 MODE 3 within 12 hours. The allowed Completion Time of 12 hours is reasonable, based on operating experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging plant systems.

(continued)

BASES
(continued)

SURVEILLANCE
REQUIREMENTS

The four SRs of this LCO are modified by a Note stating that during a single control rod scram time surveillance, the CRD pumps shall be isolated from the associated scram accumulator. With the CRD pump isolated, (i.e., charging valve closed) the influence of the CRD pump head does not affect the single control rod scram times. During a full core scram, the CRD pump head would be seen by all control rods and would have a negligible effect on the scram insertion times.

SR 3.1.4.1

The scram reactivity used in DBA and transient analyses is based on an assumed control rod scram time. Measurement of the scram times with reactor steam dome pressure ≥ 800 psig demonstrates acceptable scram times for the transients analyzed in References 3 and 4.

Maximum scram insertion times occur at a reactor steam dome pressure of approximately 800 psig because of the competing effects of reactor steam dome pressure and stored accumulator energy. Therefore, demonstration of adequate scram times at reactor steam dome pressure ≥ 800 psig ensures that the measured scram times will be within the specified limits at higher pressures. Limits are specified as a function of reactor pressure to account for the sensitivity of the scram insertion times with pressure and to allow a range of pressures over which scram time testing can be performed. To ensure that scram time testing is performed within a reasonable time following a shutdown ≥ 120 days or longer, control rods are required to be tested before exceeding 40% RTP following the shutdown. This Frequency is acceptable considering the additional surveillances performed for control rod OPERABILITY, the frequent verification of adequate accumulator pressure, and the required testing of control rods affected by fuel movement within the associated core cell and by work on control rods or the CRD System.

(continued)

BASES

SURVEILLANCE
REQUIREMENTS
(continued)

SR 3.1.4.2

Additional testing of a sample of control rods is required to verify the continued performance of the scram function during the cycle. A representative sample contains at least 10% of the control rods. The sample remains representative if no more than 7.5% of the control rods in the sample tested are determined to be "slow." With more than 7.5% of the sample declared to be "slow" per the criteria in Table 3.1.4-1, additional control rods are tested until this 7.5% criterion (e.g., 7.5% of the entire sample size) is satisfied, or until the total number of "slow" control rods (throughout the core, from all surveillances) exceeds the LCO limit. For planned testing, the control rods selected for the sample should be different for each test. Data from inadvertent scrams should be used whenever possible to avoid unnecessary testing at power, even if the control rods with data may have been previously tested in a sample. The 200 day Frequency is based on operating experience that has shown control rod scram times do not significantly change over an operating cycle. This Frequency is also reasonable based on the additional Surveillances done on the CRDs at more frequent intervals in accordance with LCO 3.1.3 and LCO 3.1.5, "Control Rod Scram Accumulators."

SR 3.1.4.3

When work that could affect the scram insertion time is performed on a control rod or the CRD System, testing must be done to demonstrate that each affected control rod retains adequate scram performance over the range of applicable reactor pressures from zero to the maximum permissible pressure. The scram testing must be performed once before declaring the control rod OPERABLE. The required scram time testing must demonstrate the affected control rod is still within acceptable limits. The limits for reactor pressures < 800 psig are established based on a high probability of meeting the acceptance criteria at reactor pressures \geq 800 psig. Limits for \geq 800 psig are found in Table 3.1.4-1. If testing demonstrates the affected control rod does not meet these limits, but is within the 7-second limit of Table 3.1.4-1, Note 2, the control rod can be declared OPERABLE and "slow."

(continued)

BASES

REQUIREMENTS SR 3.1.4.3 (continued)
SURVEILLANCE

Specific examples of work that could affect the scram times are (but are not limited to) the following: removal of any CRD for maintenance or modification; replacement of a control rod; and maintenance or modification of a scram solenoid pilot valve, scram valve, accumulator, isolation valve or check valve in the piping required for scram.

The Frequency of once prior to declaring the affected control rod OPERABLE is acceptable because of the capability to test the control rod over a range of operating conditions and the more frequent surveillances on other aspects of control rod OPERABILITY.

SR 3.1.4.4

When work that could affect the scram insertion time is performed on a control rod or CRD System, or when fuel movement within the affected core cell occurs, testing must be done to demonstrate each affected control rod is still within the limits of Table 3.1.4-1 with the reactor steam dome pressure ≥ 800 psig. Where work has been performed at high reactor pressure, the requirements of SR 3.1.4.3 and SR 3.1.4.4 can be satisfied with one test. For a control rod affected by work performed while shut down, however, a zero pressure and high pressure test may be required. This testing ensures that, prior to withdrawing the control rod for continued operation, the control rod scram performance is acceptable for operating reactor pressure conditions. Alternatively, a control rod scram test during hydrostatic pressure testing could also satisfy both criteria. When fuel movement within the reactor pressure vessel occurs, only those control rods associated with the core cells affected by the fuel movement are required to be scram time tested. During a routine refueling outage, it is expected that all control rods will be affected.

The Frequency of once prior to exceeding 40% RTP is acceptable because of the capability to test the control rod over a range of operating conditions and the more frequent surveillances on other aspects of control rod OPERABILITY.

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- REFERENCES
1. 10 CFR 50, Appendix A, GDC 10.
 2. FSAR, Section 4.3.2.
 3. FSAR, Section 4.6.

(continued)

BASES

REFERENCES
(continued)

4. FSAR, Section 15.0.
 5. FSAR, Section 15.4.9.
 6. Final Policy Statement on Technical Specifications Improvements, July 22, 1993 (58 FR 39132).
 7. Letter from R.F. Janecek (BWROG) to R.W. Starostecki (NRC), "BWR Owners Group Revised Reactivity Control System Technical Specifications," BWROG-8754, September 17, 1987.
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