



Serial: RNP-RA/10-0001

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United States Nuclear Regulatory Commission
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23

REQUEST FOR TECHNICAL SPECIFICATIONS CHANGES TO SECTION 3.3.2,
ENGINEERED SAFETY FEATURE ACTUATION SYSTEM (ESFAS)
INSTRUMENTATION, AND SECTION 3.3.6,
CONTAINMENT VENTILATION ISOLATION INSTRUMENTATION

Ladies and Gentlemen:

In accordance with the provisions of the Code of Federal Regulations, Title 10, Part 50.90, Carolina Power and Light Company, also known as Progress Energy Carolinas, Inc. (PEC), is submitting a request for an amendment to the Technical Specifications (TS) contained in Appendix A of the Operating License for H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2.

The proposed amendment will revise TS 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation," and TS 3.3.6, "Containment Ventilation Isolation System." The proposed change to TS 3.3.2 adds notes to allow for the performance of maintenance activities for an inoperable Containment Pressure – High High channel. The proposed change to TS 3.3.6 corrects an error related to table references.

Attachment I provides an Affirmation as required by 10 CFR 50.30(b).

Attachment II provides a description of the current condition, a description and justification of the proposed change, a No Significant Hazards Consideration Determination, and an Environmental Impact Consideration.

Attachment III provides a markup of the affected TS pages. Attachment IV provides the retyped TS pages. Attachment V provides a retyped version of the proposed Bases changes to Section 3.3.2. The Bases changes provide amplifying information related to the TS change.

Progress Energy Carolinas, Inc.
Robinson Nuclear Plant
3581 West Entrance Road
Hartsville, SC 29550

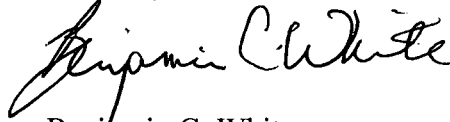
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In accordance with 10 CFR 50.91(b), Progress Energy Carolinas, Inc., is providing the State of South Carolina with a copy of this license amendment request.

Nuclear Regulatory Commission approval of the proposed license amendment is requested by November 30, 2010.

If you have any questions concerning this matter, please contact me at (843) 857-1253.

Sincerely,



Benjamin C. White

Manager – Support Services – Nuclear

Attachments:

- I. Affirmation
- II. Request for Technical Specifications Changes related to Section 3.3.2, “Engineered Safety Feature Actuation System (ESFAS) Instrumentation,” and Section 3.3.6, “Containment Ventilation Isolation Instrumentation”
- III. Markup of Technical Specifications Pages
- IV. Retyped Technical Specifications Pages
- V. Retyped Technical Specifications Bases Pages

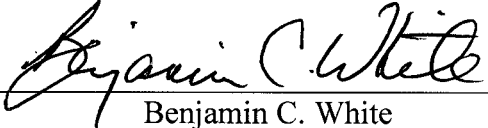
RAC/rac

- c: Ms. S. E. Jenkins, Manager, Infectious and Radioactive Waste Management Section (SC)
Mr. A. Gantt, Chief, Bureau of Radiological Health (SC)
Mr. L. A. Reyes, NRC, Region II
Mr. T. Orf, NRC Project Manager, NRR
NRC Resident Inspector, HBRSEP
Attorney General (SC)

AFFIRMATION

The information contained in letter RNP-RA/10-0001 is true and correct to the best of my information, knowledge, and belief; and the sources of my information are officers, employees, contractors, and agents of Carolina Power and Light Company, also known as Progress Energy Carolinas, Inc. I declare under penalty of perjury that the foregoing is true and correct.

Executed On: 3/5/10



Benjamin C. White
Manager - Support Services – Nuclear
HBRSEP, Unit No. 2

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

REQUEST FOR TECHNICAL SPECIFICATIONS CHANGES TO SECTION 3.3.2, “ENGINEERED SAFETY FEATURE ACTUATION SYSTEM (ESFAS) INSTRUMENTATION,” AND SECTION 3.3.6, “CONTAINMENT VENTILATION ISOLATION INSTRUMENTATION”

Description of Current Condition

Technical Specifications (TS) Limiting Condition for Operation (LCO) 3.3.2, “Engineered Safety Feature Actuation System (ESFAS) Instrumentation,” provides the operability requirements, allowed conditions, required actions, completion times, and surveillance requirements for the ESFAS instrumentation. Conditions D and E include a required action to place an inoperable channel in the trip condition within 6 hours or else initiate a reactor shutdown. Condition D would require a shutdown to Mode 4 and Condition E would require a shutdown to Mode 5. Function 4.c of Table 3.3.2-1 invokes Condition D for the inoperability of a Containment Pressure – High High channel to initiate Main Steam Line isolation. Functions 2.c and 3.b.(3) of Table 3.3.2-1 invoke Condition E for the inoperability of a Containment Pressure – High High channel to initiate Containment Spray and Phase B Containment Isolation, respectively.

Technical Specifications (TS) Limiting Condition for Operation (LCO) 3.3.6, “Containment Ventilation Isolation System,” provides the operability requirements, allowed conditions, required actions, completion times, and surveillance requirements for the Containment Ventilation Isolation instrumentation. Function 4, the initiation of Safety Injection, as listed in Table 3.3.6-1, includes the following note: “Refer to LCO 3.3.2, ‘ESFAS Instrumentation,’ Functions 1.a-f for all initiation functions and requirements.”

Description and Justification of the Proposed Change

The proposed change to TS 3.3.2 will add a note to the Required Action for both Condition D and Condition E. The proposed Note for Condition D states, “For Function 4.c, a channel may be taken out of the trip condition for 6 hours for maintenance.” The proposed Note for Condition E states, “For Functions 2.c and 3.b.(3), a channel may be taken out of the trip condition for 6 hours for maintenance.”

The three specified functions are limited to the Containment Pressure - High High channels. The three safety functions of the Containment Pressure - High High channels are to isolate the main steam lines, initiate Containment Spray, and initiate Containment Phase B Isolation.

The Containment Pressure - High High channels are uniquely designed in that they are required to be energized to be in the trip condition. This design feature was chosen to ensure a loss of power would not result in an inadvertent initiation of containment spray, as the adverse consequences of initiating containment spray could be significant. Maintenance activities that may be required to return an inoperable channel to service often require that power to the channel be interrupted. Extraordinary measures can be taken to maintain the trip signal with power to the channel

interrupted; however, these measures involve some risk to the plant. In order to remove a module without defeating the protection function, jumpers have to be installed in the rear of the respective instrument rack to bypass the module. These jumper installations would have to be installed “hot” directly on the terminations for the Vital AC Instrument Bus power supply to the rack. Therefore, even proper installation could cause arcing/spiking of the Vital AC power, which in turn could cause a loss of the Instrument Bus power. The consequences include the potential for plant perturbations, including the potential for unintended reactivity events or plant trips. These risks can be eliminated by allowing the trip function to be defeated during the performance of such maintenance activities. Current TS require initiation of a plant shutdown if the channel trip function is defeated after the initial 6 hour action time has passed. The proposed notes would allow continued plant operation with the trip function defeated for maintenance purposes for a total of six hours, not including the initial six hour action time. The proposed Bases clarify that this six hours can consist of multiple shorter periods of time.

There are six Containment Pressure - High High channels. They are divided into two groups of three. The logic for actuation of the Emergency Safety Features for the three specified functions is two-out-of-three on two sets of three channels. Therefore, with one channel’s trip function defeated, the safety functions will still actuate when required, assuming there is no failure of another channel in the inoperable channel’s grouping of three channels.

For Function 4, Steam Line Isolation, if the Containment Pressure - High High actuation did fail, the steam lines will still automatically isolate on either High Steam Flow in Two Steam Lines Coincident with T_{avg} – Low, or High Steam Flow in Two Steam Lines Coincident with Steam Line Pressure – Low. Manual isolation is also available. For Function 2, Containment Spray, and Function 3b, Containment Phase B Isolation, if the Containment Pressure - High High actuation did fail, manual actuation is available.

Therefore, the six hour allowance is acceptable based on the low probability of an accident or transient occurring during that time period, the high probability that the Containment Pressure - High High channels will still perform their actuation function, and the availability of other means to actuate the safety features. In most cases, six hours should provide sufficient time to perform maintenance activities required to return a channel to service.

The proposed change to TS 3.3.6 revises the Note for Function 4, the initiation of Safety Injection, as listed in Table 3.3.6-1, as follows: “Refer to LCO 3.3.2, “ESFAS Instrumentation,” Function 1 for all initiation functions and requirements.” The current TS note is inaccurate as it references Functions 1. a-f, but fails to include Function 1.g, which should be included. The proposed note, by referencing the function in general, captures each sub-function. This change to TS 3.3.6 represents an administrative correction, as there will be no actual changes to plant design or operation.

No Significant Hazards Consideration Determination

Carolina Power and Light Company, also known as Progress Energy Carolinas, Inc. (PEC), is proposing changes to Appendix A, Technical Specifications (TS), of Facility Operating License No. DPR-23, for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2. The proposed changes will revise TS 3.3.2, “Engineered Safety Feature Actuation System (ESFAS)

Instrumentation,” and TS 3.3.6, “Containment Ventilation Isolation System.” The proposed change to TS 3.3.2 adds notes to allow for the performance of maintenance activities for an inoperable Containment Pressure – High High channel. The proposed change to TS 3.3.6 corrects an error related to table references.

An evaluation of the proposed changes has been performed in accordance with 10 CFR 50.91(a)(1) regarding no significant hazards considerations, using the standards in 10 CFR 50.92(c). A discussion of these standards as they relate to this amendment request follows:

1. The Proposed Change Does Not Involve a Significant Increase in the Probability or Consequences of an Accident Previously Evaluated.

The proposed changes to TS 3.3.2 are intended to allow for the performance of maintenance activities required to return an inoperable channel to service with the instrumentation and plant in a condition that reduces the probability of an inadvertent transient or the need for a plant shutdown. Therefore, the proposed change reduces the probability of an accident because the likelihood of accident initiation is decreased.

The emergency safety features that are actuated by the Containment Pressure – High High channels are Main Steam Line Isolation, Containment Spray, and Containment Phase B Isolation. These safety features are intended to reduce the consequences of design basis accident scenarios. These safety features are still expected to function as designed. Actuation from containment pressure exceeding the High High trip setpoint will still occur with one trip signal bypassed based on the input from the other five channels. Should an additional failure result in the inability to actuate based on Containment Pressure High High, there are other means to actuate these safety features in a timely manner. Main Steam Line Isolation based on High High containment pressure is only important for the assumed main steam line break inside containment. For such an accident, main steam line isolation will still automatically occur from either High Steam Flow in Two Steam Lines Coincident with $T_{avg} - Low$, or High Steam Flow in Two Steam Lines Coincident with Steam Line Pressure – Low. In regard to Containment Spray and Containment Phase B Isolation, the operator can manually initiate these functions if automatic actuation did not occur and containment conditions warranted actuation. Therefore, there will not be a significant increase in the consequences of analyzed accidents.

The proposed change to TS 3.3.6 is an administrative correction and there will be no actual changes to plant design or operation.

Therefore, operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The Proposed Change Does Not Create the Possibility of a New or Different Kind of Accident From Any Previously Evaluated.

As described above, the proposed change to TS 3.3.2 would allow a single Containment Pressure – High High channel to not be in the trip condition for maintenance purposes for a limited period of time (up to six hours). This is a condition that is already allowed during the first six hours of the action statement. Therefore, no new accident initiators or precursors are introduced by the proposed change.

The proposed change to TS 3.3.6 is an administrative correction and there will be no actual changes to plant design or operation.

Therefore, operation of the facility in accordance with the proposed amendment would not create the possibility of a new or different kind of accident from any previously evaluated.

3. The Proposed Change Does Not Involve a Significant Reduction in the Margin of Safety.

As described above, the proposed change to TS 3.3.2 would allow a single Containment Pressure – High High channel to not be in the trip condition for a limited period of time (up to six hours) to allow an effective means of maintenance to return an inoperable channel to service. It is expected that safety systems will continue to function as designed with a single channel not in trip and therefore there will be no impact on the accident analyses or a reduction in the margin of safety.

The proposed change to TS 3.3.6 is an administrative correction and there will be no actual changes to plant design or operation.

Therefore, operation of the facility in accordance with the proposed amendment would not involve a significant reduction in the margin of safety.

Based on the above discussion, Carolina Power and Light Company has determined that the requested change does not involve a significant hazards consideration.

Environmental Impact Consideration

10 CFR 51.22(c)(9) provides criteria for identification of licensing and regulatory actions for categorical exclusion from performing an environmental assessment. A proposed change for an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed change would not (1) involve a significant hazards consideration; (2) result in a significant change in the types or significant increases in the amounts of any effluents that may be released offsite; (3) result in a significant increase in individual or cumulative occupational radiation exposure. Carolina Power and Light Company, also known as Progress Energy Carolinas (PEC), Inc., has reviewed this request and determined the proposed change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be

prepared in connection with the issuance of the amendment. The basis for this determination follows.

Proposed Change

Carolina Power and Light Company, also known as Progress Energy Carolinas, Inc. (PEC), is proposing changes to Appendix A, Technical Specifications (TS), of Facility Operating License No. DPR-23, for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2. The proposed changes will revise TS 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation," and TS 3.3.6, "Containment Ventilation Isolation System." The proposed change to TS 3.3.2 adds notes to allow for the performance of maintenance activities for an inoperable Containment Pressure - High-High channel. The proposed change to TS 3.3.6 corrects an error related to table references.

Basis

The proposed change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) for the following reasons:

1. As demonstrated in the No Significant Hazards Consideration Determination, the proposed change does not involve a significant hazards consideration.
2. As demonstrated in the No Significant Hazards Consideration Determination, the proposed change does not result in a significant increase in the consequences of an accident previously evaluated and does not result in the possibility of a new or different kind of accident. The proposed change is unrelated and hence has no impact on plant effluents from normal operation. Therefore, the proposed change does not result in a significant change in the types or significant increases in the amounts of any effluents that may be released offsite.
3. The proposed change does not alter any parameters that impact the individual and cumulative radiation exposure for HBRSEP, Unit No. 2. Therefore, the proposed change does not result in a significant increase in individual or cumulative occupational radiation exposures.

United States Nuclear Regulatory Commission
Attachment III to Serial: RNP-RA/10-0001
3 Pages (including cover page)

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

**REQUEST FOR TECHNICAL SPECIFICATIONS CHANGES TO SECTION 3.3.2,
ENGINEERED SAFETY FEATURE ACTUATION SYSTEM (ESFAS)
INSTRUMENTATION, AND SECTION 3.3.6,
CONTAINMENT VENTILATION ISOLATION INSTRUMENTATION**

MARKUP OF TECHNICAL SPECIFICATIONS PAGES

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. One train inoperable.	C.1 Restore train to OPERABLE status.	12 hours
	<u>OR</u>	
	C.2.1 Be in MODE 3.	18 hours
	<u>AND</u>	
	C.2.2 Be in MODE 5.	48 hours
D. One channel inoperable.	-----NOTE----- For Function 4.c, a channel may be taken out of the trip condition for 6 hours for maintenance. -----	
	D.1 Place channel in trip.	6 hours
	<u>OR</u>	
	D.2.1 Be in MODE 3.	12 hours
	<u>AND</u>	
	D.2.2 Be in MODE 4.	18 hours
E. One Containment Pressure channel inoperable.	-----NOTE----- For Functions 2.c and 3.b.(3), a channel may be taken out of the trip condition for 6 hours for maintenance. -----	
	E.1 Place channel in trip.	6 hours
	<u>OR</u>	
	E.2.1 Be in MODE 3.	12 hours
	<u>AND</u>	
		E.2.2 Be in MODE 4.
	<u>AND</u>	
	E.2.3 Be in MODE 5.	42 hours

(continued)

Containment Ventilation Isolation Instrumentation
3.3.6

Table 3.3.6-1 (page 1 of 1)
Containment Ventilation Isolation Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	SURVEILLANCE REQUIREMENTS	TRIP SETPOINT
1. Manual Initiation	1,2,3,4,(a)	2	SR 3.3.6.6	NA
2. Automatic Actuation Logic and Actuation Relays	1,2,3,4,(a)	2 trains	SR 3.3.6.2 SR 3.3.6.3 SR 3.3.6.5	NA
3. Containment Radiation				
a. Gaseous	1,2,3,4,(a)	1	SR 3.3.6.1 SR 3.3.6.4 SR 3.3.6.7	(b)
b. Particulate	1,2,3,4,(a)	1	SR 3.3.6.1 SR 3.3.6.4 SR 3.3.6.7	(b)
4. Safety Injection	Refer to LCO 3.3.2, "ESFAS Instrumentation," Function 1-a-f, for all initiation functions and requirements.			

(a) During movement of recently irradiated fuel assemblies within the containment.

(b) Trip Setpoint shall be in accordance with the methodology in the Offsite Dose Calculation Manual.

United States Nuclear Regulatory Commission
Attachment IV to Serial: RNP-RA/10-0001
3 Pages (including cover page)

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

**REQUEST FOR TECHNICAL SPECIFICATIONS CHANGES TO SECTION 3.3.2,
ENGINEERED SAFETY FEATURE ACTUATION SYSTEM (ESFAS)
INSTRUMENTATION, AND SECTION 3.3.6,
CONTAINMENT VENTILATION ISOLATION INSTRUMENTATION**

RETYPE TECHNICAL SPECIFICATIONS PAGES

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. One train inoperable.	C.1 Restore train to OPERABLE status.	12 hours
	<u>OR</u>	
	C.2.1 Be in MODE 3.	18 hours
	<u>AND</u>	
	C.2.2 Be in MODE 5.	48 hours
D. One channel inoperable.	-----NOTE----- For Function 4.c, a channel may be taken out of the trip condition for 6 hours for maintenance. -----	
	D.1 Place channel in trip.	6 hours
	<u>OR</u>	
	D.2.1 Be in MODE 3.	12 hours
	<u>AND</u>	
	D.2.2 Be in MODE 4.	18 hours
E. One Containment Pressure channel inoperable.	-----NOTE----- For Functions 2.c and 3.b.(3), a channel may be taken out of the trip condition for 6 hours for maintenance. -----	
	E.1 Place channel in trip.	6 hours
	<u>OR</u>	
	E.2.1 Be in MODE 3.	12 hours
	<u>AND</u>	
		E.2.2 Be in MODE 4.
	<u>AND</u>	
	E.2.3 Be in MODE 5.	42 hours

(continued)

Containment Ventilation Isolation Instrumentation
3.3.6

Table 3.3.6-1 (page 1 of 1)
Containment Ventilation Isolation Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	SURVEILLANCE REQUIREMENTS	TRIP SETPOINT
1. Manual Initiation	1,2,3,4,(a)	2	SR 3.3.6.6	NA
2. Automatic Actuation Logic and Actuation Relays	1,2,3,4,(a)	2 trains	SR 3.3.6.2 SR 3.3.6.3 SR 3.3.6.5	NA
3. Containment Radiation				
a. Gaseous	1,2,3,4,(a)	1	SR 3.3.6.1 SR 3.3.6.4 SR 3.3.6.7	(b)
b. Particulate	1,2,3,4,(a)	1	SR 3.3.6.1 SR 3.3.6.4 SR 3.3.6.7	(b)
4. Safety Injection	Refer to LCO 3.3.2, "ESFAS Instrumentation," Function 1, for all initiation functions and requirements.			

(a) During movement of recently irradiated fuel assemblies within the containment.

(b) Trip Setpoint shall be in accordance with the methodology in the Offsite Dose Calculation Manual.

United States Nuclear Regulatory Commission
Attachment V to Serial: RNP-RA/10-0001
4 Pages (including cover page)

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

**REQUEST FOR TECHNICAL SPECIFICATIONS CHANGES TO SECTION 3.3.2,
ENGINEERED SAFETY FEATURE ACTUATION SYSTEM (ESFAS)
INSTRUMENTATION, AND SECTION 3.3.6,
CONTAINMENT VENTILATION ISOLATION INSTRUMENTATION**

RETYPE TECHNICAL SPECIFICATIONS BASES PAGES

BASES

ACTIONS

C.1, C.2.1, and C.2.2 (continued)

from full power conditions in an orderly manner and without challenging unit systems.

D.1, D.2.1, and D.2.2

Condition D applies to:

- Pressurizer Pressure—Low;
- Steam Line Differential Pressure—High;
- High Steam Flow in Two Steam Lines Coincident With T_{avg} —Low or Coincident With Steam Line Pressure—Low; and
- Steam Line Isolation Containment Pressure - High High.

If one channel is inoperable, 6 hours are allowed to restore the channel to OPERABLE status or to place it in the tripped condition. Generally this Condition applies to functions that operate on two-out-of-three logic. Therefore, failure of one channel places the Function in a two-out-of-two configuration. One channel must be tripped to place the Function in a one-out-of-two configuration that satisfies redundancy requirements.

Failure to restore the inoperable channel to OPERABLE status or place it in the tripped condition within 6 hours requires the unit be placed in MODE 3 within the following 6 hours and MODE 4 within the next 6 hours.

The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems. In MODE 4, these Functions are no longer required OPERABLE.

The Action for Condition D is modified by a Note that allows a channel for Function 4.c, Steam Line Isolation - Containment Pressure - High High, to be taken out of the trip condition for 6 hours for maintenance purposes. The channel may be taken out of the trip condition multiple times provided the total time out of trip does not exceed 6 hours (not including the initial 6 hour action time). The

(continued)

BASES

ACTIONS

D.1, D.2.1, and D.2.2 (continued)

Containment Pressure - High High channels are uniquely designed in that they are required to be energized to be in the trip condition. Maintenance activities that interrupt power to the channel, such as, replacement of the comparator module, cause the channel to be taken out of the trip condition. Therefore, the note allows conducting these activities without being required to implement extraordinary measures to maintain the channel in the tripped condition. The 6-hour allowance is considered acceptable based on the low probability of an accident during this time, another channel of Containment Pressure - High High must fail to prevent the isolation of the steam line from Containment Pressure - High High, and other ESFAS functions provide an automatic steam line isolation function.

E.1, E.2.1, and E.2.2

Condition E applies to:

- Safety Injection Containment Pressure—High; and
- Containment Spray Containment Pressure—High High.

None of these signals has input to a control function. Thus, two-out-of-three logic is necessary to meet acceptable protective requirements. However, a two-out-of-three design would require tripping a failed channel. This is undesirable because a single failure would then cause spurious containment spray initiation. Spurious spray actuation is undesirable because of the cleanup problems presented. Therefore, these channels are designed with two-out-of-three on two sets of three logic. One channel per set may be placed in trip and still maintain adequate margin to spurious spray actuation.

To avoid the inadvertent actuation of containment spray and Phase B containment isolation, no more than one channel per set may be placed in trip. Restoring the channel to OPERABLE status, or placing the inoperable channel in trip within 6 hours, is sufficient to assure that the Function remains OPERABLE and minimizes the time that the Function may be in a partial trip condition (assuming the inoperable channel has failed high). The Completion Time is further

(continued)

BASES

ACTIONS

E.1, E.2.1, and E.2.2 (continued)

justified based on the low probability of an event occurring during this interval. Failure to restore the inoperable channel to OPERABLE status, or place it in trip within 6 hours, requires the unit be placed in MODE 3 within the following 6 hours, MODE 4 within the next 6 hours, and MODE 5 within the next 24 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems. In MODE 5, these Functions are no longer required OPERABLE.

The Action for Condition E is modified by a Note that allows a channel for Function 2.c, Containment Spray - Containment Pressure - High High, and Function 3.b.(3), Containment Phase B Isolation - Containment Pressure - High High, to be taken out of the trip condition for 6 hours for maintenance purposes. The channel may be taken out of the trip condition multiple times provided the total time out of trip does not exceed 6 hours (not including the initial 6 hour action time). The Containment Pressure - High High channels are uniquely designed in that they are required to be energized to be in the trip condition. Maintenance activities that interrupt power to the channel, such as, replacement of the comparator module, cause the channel to be taken out of the trip condition. Therefore, the note allows conducting these activities without being required to implement extraordinary measures to maintain the channel in the tripped condition. The 6-hour allowance is considered acceptable based on the low probability of an accident during this time, another channel of Containment Pressure - High High must fail to prevent the initiation of containment spray or containment Phase B isolation from Containment Pressure - High High, and containment spray or containment Phase B isolation can be initiated manually.

F.1, F.2.1, and F.2.2

Condition F applies to:

- Manual Initiation of Steam Line Isolation.

For the Manual Initiation Function, this action addresses the train orientation of the relay logic. If a train or channel is inoperable, 48 hours are allowed to return it to OPERABLE status. The specified Completion Time is

(continued)