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TRM1 text LOES 3/2//2010

B 3.8.1 Primary Containment Penetration Conductor Overcurrent Protective Devices

BASES

TRO

TRO 3.8.1 requires that all primary containment penetration conductor overcurrent protective devices are OPERABLE. This assures that the design limits of the containment electrical penetrations will not be challenged as a result of electrical faults on the penetration conductors. Primary containment electrical penetrations and penetration conductors are protected by either de-energizing circuits not required during reactor operation or demonstrating the OPERABILITY of primary and backup overcurrent protection circuit breakers by periodic surveillance.

ACTIONS

The ACTIONS are defined to ensure proper corrective measures are taken in response to the inoperable components.

The ACTIONS have been modified by a Note to clarify the application of Completion Time rules. The Conditions of this TRO may be entered independently for each affected protective device. The Completion Time(s) of the inoperable primary containment penetration conductor overcurrent protective device will be tracked separately for each affected device starting from the time the Condition was entered for that device as a result of discovery of an inoperable device.

A.1 and A.2

With one or more required primary containment penetration conductor overcurrent protective devices inoperable, the circuit(s) associated with the inoperable protection device(s) must be placed in a condition that would preclude the possibility of a fault that could overload the circuit(s). To accomplish this, the circuit is deenergized. Since systems or components supplied by the affected circuit will no longer have power, they must be declared inoperable. The 72 hour Completion Time takes into account the design of the electrical penetration for maximum fault current, the availability of backup circuit protection on the distribution system and the low probability of a design basis accident occurring during this period. This Completion Time is also considered reasonable to perform the necessary repairs or circuit alterations to restore or otherwise deenergize the affected circuit.

In order to assure that any electrical penetration which is not protected by an overcurrent device remains deenergized, it is necessary to periodically verify that its alternate circuit breaker is opened, or that the inoperable circuit breaker is opened. A Completion Time of once per 7 days is considered sufficient due to the infrequency of plant operations that could result in reenergizing a circuit that has been deenergized in this manner.

B 3.8.1 Primary Containment Penetration Conductor Overcurrent Protective Devices

BASES

ACTIONS (continued)

<u>B.1</u>

In the event that the Required Actions and associated Completion Times of Condition A are not met, the plant must be placed in a MODE or other specified condition in which the TRO does not apply. This is done by placing the plant in at least MODE 3 within 12 hours and in MODE 4 within 36 hours. The Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

TRS

The TRSs are performed at the specified Frequency to ensure that the required overcurrent protective devices are maintained OPERABLE.

TRS 3.8.1.1

This surveillance requires the performance of a functional test on a representative sample of $\geq 10\%$ of each type of lower voltage circuit breaker used as penetration protection. This sample size is sufficiently large to represent the actual failure distribution within the whole population of circuit breakers of a given type used in the plant. Circuit breakers selected for functional testing should be selected on a rotating basis.

A representative sample is determined based upon each manufacturer's brand of circuit breaker. Each manufacturer's molded case and metal case circuit breakers are grouped into representative samples, which are then tested on a rotating basis to ensure that all breakers are tested. If a wide variety exists within any manufacturer's brand of circuit breakers, it is necessary to divide that manufacturer's breakers into groups and treat each group as a separate type of breaker for surveillance purposes.

This surveillance has been modified by a Note, stating that for each circuit breaker found inoperable during these functional tests, an additional representative sample of at least 10% of all circuit breakers of the inoperable type shall be functionally tested until no more failures are found or all circuit breakers of that type have been tested. The expansion of the test population ensures that a failure discovered in the representative sample was not caused by a failure mechanism that could systematically affect other breakers in the overall population of breakers of the same type.

The functional tests required by TRS 3.8.1.1 consist of injecting a current with a value equal to 300% of the pickup of the thermal (long term time delay) element of Types 150A Frame and 250A Frame (thermal magnetic)

(continued)

B 3.8.1 Primary Containment Penetration Conductor Overcurrent Protective Devices

BASES

TRS (continued)

circuit breakers, and verifying that the circuit breaker operates within the time delay band-width specified by the manufacturer for the test current. The magnetic (instantaneous) element is tested by injecting a current in excess of 120% of the pickup value of the magnetic (instantaneous) element and verifying that the circuit breaker trips instantaneously with no intentional time delay. Type 150A Frame (magnetic only) circuit breaker testing also follows this procedure except that no thermal trip elements are involved. Circuit breakers found inoperable during functional testing should be restored to OPERABLE status prior to resuming operation.

If there are any failure mechanisms that could affect the OPERABILITY of the circuit breaker(s) they are likely to have occurred in the sample tested. The 24 month Frequency takes into consideration the infrequent operation of the breakers and their correspondingly low failure rate.

TRS 3.8.1.2

This surveillance requires the performance of a functional test on each required overcurrent relay. The functional test consists of injecting a current sufficient to actuate the relay, verify the pickup current is less than 120% of the nominal relay pickup current, and that the measured response time is within $\pm 10\%$ of the specified value. The 24 month Frequency takes into consideration the infrequent operation of the breakers and their correspondingly low failure rate.

TRS 3.8.1.3

This surveillance requires the inspection of each circuit breaker and the performance of procedures prepared in conjunction with the manufacturer's recommendations. By performance of recommended maintenance, the likelihood for the circuit breakers to become inoperable can be minimized. The 120 month Frequency takes into consideration the low frequency of operation of the circuit breakers and the low likelihood that operation and maintenance activities could adversely affect the OPERABILITY of the circuit breakers. Provisions of TRS 3.0.2 are not applicable.

R	F	FF	=R	FI	VC.	ES	N	one