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TRM2 - TECHNICAL REQUIREMENTS MANUAL UNIT 2

REMOVE MANUAL TABLE OF CONTENTS DATE: 03/08/2010

ADD MANUAL TABLE OF CONTENTS DATE: 03/10/2010

CATEGORY: DOCUMENTS TYPE: TRM2

A001
NRR

ID: TEXT B3.8.1
ADD: REV: 2

REMOVE: REV:1

CATEGORY: DOCUMENTS TYPE: TRM2
ID: TEXT LOES
REMOVE: REV:56

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Manual Name: TRM2

Manual Title: TECHNICAL REQUIREMENTS MANUAL UNIT 2

Table Of Contents

Issue Date: 03/10/2010

LDCN 4712

Manual Name: TRM2

Manual Title: TECHNICAL REQUIREMENTS MANUAL UNIT 2

TEXT 3.3.1 0 11/19/2002
Title: INSTRUMENTATION RADIATION MONITORING INSTRUMENTATION

TEXT 3.3.2 2 11/09/2007
Title: INSTRUMENTATION SEISMIC MONITORING INSTRUMENTATION

TEXT 3.3.3 2 11/09/2007
Title: INSTRUMENTATION METEOROLOGICAL MONITORING INSTRUMENTATION

TEXT 3.3.4 5 05/23/2008
Title: INSTRUMENTATION TRM POST-ACCIDENT MONITORING INSTRUMENTATION

TEXT 3.3.5 0 11/19/2002
Title: INSTRUMENTATION THIS PAGE INTENTIONALLY LEFT BLANK

TEXT 3.3.6 2 10/19/2005
Title: INSTRUMENTATION TRM ISOLATION ACTUATION INSTRUMENTATION

TEXT 3.3.7 1 11/09/2007
Title: INSTRUMENTATION MAIN TURBINE OVERSPEED PROTECTION SYSTEM

TEXT 3.3.8 1 10/22/2003
Title: INSTRUMENTATION TRM RPS INSTRUMENTATION

TEXT 3.3.9 3 05/14/2009
Title: INSTRUMENTATION LPRM UPSCALE ALARM INSTRUMENTATION

TEXT 3.3.10 1 12/14/2004
Title: INSTRUMENTATION REACTOR RECIRCULATION PUMP MG SET STOPS

TEXT 3.3.11 1 10/22/2003
Title: INSTRUMENTATION MVP ISOLATION INSTRUMENTATION

TEXT 3.3.12 0 04/16/2009
Title: WATER MONITORING INSTRUMENTATION

Manual Name: TRM2

Manual Title: TECHNICAL REQUIREMENTS MANUAL UNIT 2

TEXT 3.4.1 1 04/26/2006
Title: REACTOR COOLANT SYSTEM REACTOR COOLANT SYSTEM CHEMISTRY

TEXT 3.4.2 1 04/16/2009
Title: REACTOR COOLANT SYSTEM STRUCTURAL INTEGRITY

TEXT 3.4.3 1 11/09/2007
Title: REACTOR COOLANT SYSTEM REACTOR COOLANT SYSTEM (RCS)

TEXT 3.4.4 2 05/14/2009
Title: REACTOR COOLANT SYSTEM REACTOR RECIRCULATION FLOW AND ROD LINE LIMIT

TEXT 3.4.5 1 04/26/2006
Title: REACTOR COOLANT SYSTEM REACTOR VESSEL MATERIALS

TEXT 3.5.1 1 02/04/2005
Title: ECCS AND RCIC ADS MANUAL INHIBIT

TEXT 3.5.2 1 11/09/2007
Title: ECCS AND RCIC ECCS AND RCIC SYSTEM MONITORING INSTRUMENTATION

TEXT 3.5.3 0 11/19/2002
Title: ECCS AND RCIC LONG TERM NITROGEN SUPPLY TO ADS

TEXT 3.6.1 0 11/19/2002
Title: CONTAINMENT VENTING OR PURGING

TEXT 3.6.2 0 11/19/2002
Title: CONTAINMENT SUPPRESSION CHAMBER-TO-DRYWELL VACUUM BREAKER POSITION INDICATION

TEXT 3.6.3 0 11/19/2002
Title: CONTAINMENT SUPPRESSION POOL ALARM INSTRUMENTATION

TEXT 3.6.4 0 11/19/2002
Title: CONTAINMENT PRIMARY CONTAINMENT CLOSED SYSTEM BOUNDARIES

Manual Name: TRM2

Manual Title: TECHNICAL REQUIREMENTS MANUAL UNIT 2

TEXT 3.7.1 0 11/19/2002
Title: PLANT SYSTEMS EMERGENCY SERVICE WATER SYSTEM (ESW) SHUTDOWN

TEXT 3.7.2 0 11/19/2002
Title: PLANT SYSTEMS ULTIMATE HEAT SINK (UHS) AND GROUND WATER LEVEL

TEXT 3.7.3.1 2 04/16/2009
Title: PLANT SYSTEMS FIRE SUPPRESSION WATER SUPPLY SYSTEM

TEXT 3.7.3.2 3 04/16/2009
Title: PLANT SYSTEMS SPRAY AND SPRINKLER SYSTEMS

TEXT 3.7.3.3 3 04/16/2009
Title: PLANT SYSTEMS CO2 SYSTEMS

TEXT 3.7.3.4 2 04/16/2009
Title: PLANT SYSTEMS HALON SYSTEMS

TEXT 3.7.3.5 2 04/16/2009
Title: PLANT SYSTEMS FIRE HOSE STATIONS

TEXT 3.7.3.6 2 04/16/2009
Title: PLANT SYSTEMS YARD FIRE HYDRANTS AND HYDRANT HOSE HOUSES

TEXT 3.7.3.7 1 04/26/2006
Title: PLANT SYSTEMS FIRE RATED ASSEMBLIES

TEXT 3.7.3.8 8 01/20/2010
Title: PLANT SYSTEMS FIRE DETECTION INSTRUMENTATION

TEXT 3.7.4 1 04/26/2006
Title: PLANT SYSTEMS SOLID RADWASTE SYSTEM

TEXT 3.7.5.1 0 11/19/2002
Title: PLANT SYSTEMS MAIN CONDENSER OFFGAS HYDROGEN MONITOR

Manual Name: TRM2

Manual Title: TECHNICAL REQUIREMENTS MANUAL UNIT 2

TEXT 3.7.5.2 0 11/19/2002
Title: PLANT SYSTEMS MAIN CONDENSER OFFGAS EXPLOSIVE GAS MIXTURE

TEXT 3.7.5.3 1 04/26/2006
Title: PLANT SYSTEMS LIQUID HOLDUP TANKS

TEXT 3.7.6 2 06/27/2008
Title: PLANT SYSTEMS ESSW PUMPHOUSE VENTILATION

TEXT 3.7.7 2 09/05/2008
Title: PLANT SYSTEMS MAIN CONDENSER OFFGAS PRETREATMENT LOGARITHMIC RADIATION MONITORING INSTRUMENTATION

TEXT 3.7.8 6 06/21/2007
Title: PLANT SYSTEMS SNUBBERS

TEXT 3.7.9 1 08/28/2006
Title: PLANT SYSTEMS CONTROL STRUCTURE HVAC

TEXT 3.7.10 1 12/14/2004
Title: PLANT SYSTEMS SPENT FUEL STORAGE POOLS (SFSPS)

TEXT 3.7.11 1 10/02/2009
Title: PLANT SYSTEMS

TEXT 3.8.1 2 02/04/2005
Title: ELECTRICAL POWER PRIMARY CONTAINMENT PENETRATION CONDUCTOR OVERCURRENT PROTECTIVE DEVICES

TEXT 3.8.2.1 2 11/09/2007
Title: ELECTRICAL POWER MOTOR OPERATED VALVES (MOV) THERMAL OVERLOAD PROTECTION - CONTINUOUS

TEXT 3.8.2.2 2 12/14/2004
Title: ELECTRICAL POWER MOTOR OPERATED VALVES (MOV) THERMAL OVERLOAD PROTECTION - AUTOMATIC

TEXT 3.8.3 0 11/19/2002
Title: ELECTRICAL POWER DIESEL GENERATOR (DG) MAINTENANCE ACTIVITIES

TEXT 3.8.4 1 02/04/2005
Title: ELECTRICAL POWER 24 VDC ELECTRICAL SUBSYSTEM

TEXT 3.8.5 0 11/19/2002
Title: ELECTRICAL POWER DEGRADED VOLTAGE PROTECTION

TEXT 3.8.6 0 11/19/2002
Title: ELECTRICAL POWER EMERGENCY SWITCHGEAR ROOM COOLING

TEXT 3.8.7 2 10/22/2009
Title: BATTERY MAINTENANCE AND MONITORING PROGRAM

TEXT 3.9.1 0 11/19/2002
Title: REFUELING OPERATIONS DECAY TIME

TEXT 3.9.2 0 11/19/2002
Title: REFUELING OPERATIONS COMMUNICATIONS

TEXT 3.9.3 0 11/19/2002
Title: REFUELING OPERATIONS REFUELING PLATFORM

TEXT 3.10.1 1 04/26/2006
Title: MISCELLANEOUS SEALED SOURCE CONTAMINATION

TEXT 3.10.2 1 04/09/2007
Title: MISCELLANEOUS SHUTDOWN MARGIN TEST RPS INSTRUMENTATION

TEXT 3.10.3 1 04/26/2006
Title: MISCELLANEOUS INDEPENDENT SPENT FUEL STORAGE INSTALLATION (ISFSI)

TEXT 3.11.1.1 1 04/26/2006
Title: RADIOACTIVE EFFLUENTS LIQUID EFFLUENTS CONCENTRATION

TEXT 3.11.1.2 1 04/26/2006
Title: RADIOACTIVE EFFLUENTS LIQUID EFFLUENTS DOSE

Manual Name: TRM2

Manual Title: TECHNICAL REQUIREMENTS MANUAL UNIT 2

TEXT 3.11.1.3 1 04/26/2006
Title: RADIOACTIVE EFFLUENTS LIQUID WASTE TREATMENT SYSTEM

TEXT 3.11.1.4 1 12/14/2004
Title: RADIOACTIVE EFFLUENTS LIQUID RADWASTE EFFLUENT MONITORING INSTRUMENTATION

TEXT 3.11.1.5 2 05/02/2007
Title: RADIOACTIVE EFFLUENTS RADIOACTIVE LIQUID PROCESS MONITORING INSTRUMENTATION

TEXT 3.11.2.1 3 04/26/2006
Title: RADIOACTIVE EFFLUENTS DOSE RATE

TEXT 3.11.2.2 1 04/26/2006
Title: RADIOACTIVE EFFLUENTS DOSE - NOBLE GASES

TEXT 3.11.2.3 1 04/26/2006
Title: RADIOACTIVE EFFLUENTS DOSE - IODINE, TRITIUM, AND RADIONUCLIDES IN PARTICULATE FORM

TEXT 3.11.2.4 0 11/19/2002
Title: RADIOACTIVE EFFLUENTS GASEOUS RADWASTE TREATMENT SYSTEM

TEXT 3.11.2.5 3 11/14/2006
Title: RADIOACTIVE EFFLUENTS VENTILATION EXHAUST TREATMENT SYSTEM

TEXT 3.11.2.6 4 09/16/2009
Title: RADIOACTIVE EFFLUENTS RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

TEXT 3.11.3 1 04/26/2006
Title: RADIOACTIVE EFFLUENTS TOTAL DOSE

TEXT 3.11.4.1 3 04/26/2006
Title: RADIOACTIVE EFFLUENTS MONITORING PROGRAM

TEXT 3.11.4.2 2 04/26/2006
Title: RADIOACTIVE EFFLUENTS LAND USE CENSUS

Manual Name: TRM2

Manual Title: TECHNICAL REQUIREMENTS MANUAL UNIT 2

TEXT 3.11.4.3 1 04/26/2006
Title: RADIOACTIVE EFFLUENTS INTERLABORATORY COMPARISON PROGRAM

TEXT 3.12.1 0 11/19/2002
Title: LOADS CONTROL PROGRAM CRANE TRAVEL-SPENT FUEL STORAGE POOL

TEXT 3.12.2 4 04/17/2008
Title: LOADS CONTROL PROGRAM HEAVY LOADS REQUIREMENTS

TEXT 3.12.3 0 11/19/2002
Title: LOADS CONTROL PROGRAM LIGHT LOADS REQUIREMENTS

TEXT 4.1 0 09/27/2003
Title: ADMINISTRATIVE CONTROLS ORGANIZATION

TEXT 4.2 0 09/27/2003
Title: ADMINISTRATIVE CONTROLS REPORTABLE EVENT ACTION

TEXT 4.3 0 09/27/2003
Title: ADMINISTRATIVE CONTROLS SAFETY LIMIT VIOLATION

TEXT 4.4 1 12/18/2008
Title: ADMINISTRATIVE CONTROLS PROCEDURES & PROGRAMS

TEXT 4.5 0 09/27/2003
Title: ADMINISTRATIVE CONTROLS REPORTING REQUIREMENTS

TEXT 4.6 0 09/27/2003
Title: ADMINISTRATIVE CONTROLS RADIATION PROTECTION PROGRAM

TEXT 4.7 0 09/27/2003
Title: ADMINISTRATIVE CONTROLS TRAINING

TEXT B3.0 4 05/23/2008
Title: APPLICABILITY BASES TECHNICAL REQUIREMENT FOR OPERATION (TRO) APPLICABILITY

Manual Name: TRM2

Manual Title: TECHNICAL REQUIREMENTS MANUAL UNIT 2

TEXT B3.1.1 1 11/09/2007
Title: REACTIVITY CONTROL SYSTEM BASES ANTICIPATED TRANSIENT WITHOUT SCRAM ALTERNATE ROD INJECTION (ATWS-ARI) INSTRUMENTATION

TEXT B3.1.2 0 11/19/2002
Title: REACTIVITY CONTROL SYSTEM BASES CONTROL ROD DRIVE (CRD) HOUSING SUPPORT

TEXT B3.1.3 3 04/10/2007
Title: REACTIVITY CONTROL SYSTEM BASES CONTROL ROD BLOCK INSTRUMENTATION

TEXT B3.1.4 0 11/19/2002
Title: REACTIVITY CONTROL SYSTEM BASES CONTROL ROD SCRAM ACCUMULATORS INSTRUMENTATION AND CHECK VALVE

TEXT B3.2.1 0 11/19/2002
Title: CORE OPERATING LIMITS BASES CORE OPERATING LIMITS REPORT (COLR)

TEXT B3.3.1 0 11/19/2002
Title: INSTRUMENTATION BASES RADIATION MONITORING INSTRUMENTATION

TEXT B3.3.2 1 11/09/2007
Title: INSTRUMENTATION BASES SEISMIC MONITORING INSTRUMENTATION

TEXT B3.3.3 2 11/09/2007
Title: INSTRUMENTATION BASES METEOROLOGICAL MONITORING INSTRUMENTATION

TEXT B3.3.4 3 11/09/2007
Title: INSTRUMENTATION BASES TRM POST ACCIDENT MONITORING (PAM) INSTRUMENTATION

TEXT B3.3.5 2 11/09/2007
Title: INSTRUMENTATION BASES THIS PAGE INTENTIONALLY LEFT BLANK

TEXT B3.3.6 3 10/19/2005
Title: INSTRUMENTATION BASES TRM ISOLATION ACTUATION INSTRUMENTATION

TEXT B3.3.7 1 11/09/2007
Title: INSTRUMENTATION BASES MAIN TURBINE OVERSPEED PROTECTION SYSTEM

Manual Name: TRM2

Manual Title: TECHNICAL REQUIREMENTS MANUAL UNIT 2

TEXT B3.3.8 1 10/22/2003
Title: INSTRUMENTATION BASES TRM RPS INSTRUMENTATION

TEXT B3.3.9 3 05/14/2009
Title: INSTRUMENTATION BASES LPRM UPSCALE ALARM INSTRUMENTATION

TEXT B3.3.10 1 12/18/2008
Title: INSTRUMENTATION BASES REACTOR RECIRCULATION PUMP MG SET STOPS

TEXT B3.3.11 1 10/22/2003
Title: INSTRUMENTATION BASES MVP ISOLATION INSTRUMENTATION

TEXT B3.3.12 0 04/16/2009
Title: WATER MONITORING INSTRUMENTATION

TEXT B3.4.1 0 11/19/2002
Title: REACTOR COOLANT SYSTEM BASES REACTOR COOLANT SYSTEM CHEMISTRY

TEXT B3.4.2 1 04/16/2009
Title: REACTOR COOLANT SYSTEM BASES STRUCTURAL INTEGRITY

TEXT B3.4.3 1 11/09/2007
Title: REACTOR COOLANT SYSTEM BASES HIGH/LOW PRESSURE INTERFACE LEAKAGE MONITOR

TEXT B3.4.4 0 11/19/2002
Title: REACTOR COOLANT SYSTEM BASES REACTOR RECIRCULATION FLOW AND ROD LINE LIMIT

TEXT B3.4.5 0 11/19/2002
Title: REACTOR COOLANT SYSTEM BASES REACTOR VESSEL MATERIALS

TEXT B3.5.1 0 11/19/2002
Title: ECCS AND RCIC BASES ADS MANUAL INHIBIT

TEXT B3.5.2 1 11/09/2007
Title: ECCS AND RCIC BASES ECCS AND RCIC SYSTEM MONITORING INSTRUMENTATION

Manual Name: TRM2

Manual Title: TECHNICAL REQUIREMENTS MANUAL UNIT 2

TEXT B3.5.3 1 11/09/2007
Title: ECCS AND RCIC BASES LONG TERM NITROGEN SUPPLY TO ADS

TEXT B3.6.1 0 11/19/2002
Title: CONTAINMENT BASES VENTING OR PURGING

TEXT B3.6.2 0 11/19/2002
Title: CONTAINMENT BASES SUPPRESSION CHAMBER-TO-DRYWELL VACUUM BREAKER POSITION INDICATION

TEXT B3.6.3 1 04/19/2007
Title: CONTAINMENT BASES SUPPRESSION POOL ALARM INSTRUMENTATION

TEXT B3.6.4 1 12/14/2004
Title: CONTAINMENT BASES PRIMARY CONTAINMENT CLOSED SYSTEM BOUNDARIES

TEXT B3.7.1 0 11/19/2002
Title: PLANT SYSTEMS BASES EMERGENCY SERVICE WATER SYSTEM (SHUTDOWN)

TEXT B3.7.2 0 11/19/2002
Title: PLANT SYSTEMS BASES ULTIMATE HEAT SINK (UHS) GROUND WATER LEVEL

TEXT B3.7.3.1 2 01/07/2008
Title: PLANT SYSTEMS BASES FIRE SUPPRESSION WATER SUPPLY SYSTEM

TEXT B3.7.3.2 2 04/26/2006
Title: PLANT SYSTEMS BASES SPRAY AND SPRINKLER SYSTEMS

TEXT B3.7.3.3 0 11/19/2002
Title: PLANT SYSTEMS BASES CO2 SYSTEMS

TEXT B3.7.3.4 1 04/26/2006
Title: PLANT SYSTEMS BASES HALON SYSTEMS

TEXT B3.7.3.5 1 04/26/2006
Title: PLANT SYSTEMS BASES FIRE HOSE STATIONS

TEXT B3.7.3.6 1 04/26/2006
Title: PLANT SYSTEMS BASES YARD FIRE HYDRANTS AND HYDRANT HOSE HOUSES

TEXT B3.7.3.7 0 11/19/2002
Title: PLANT SYSTEMS BASES FIRE RATED ASSEMBLIES

TEXT B3.7.3.8 1 01/12/2004
Title: PLANT SYSTEMS BASES FIRE DETECTION INSTRUMENTATION

TEXT B3.7.4 0 11/19/2002
Title: PLANT SYSTEMS BASES SOLID RADWASTE SYSTEM

TEXT B3.7.5.1 0 11/19/2002
Title: PLANT SYSTEMS BASES MAIN CONDENSER OFFGAS HYDROGEN MONITOR

TEXT B3.7.5.2 0 11/19/2002
Title: PLANT SYSTEMS BASES MAIN CONDENSER OFFGAS EXPLOSIVE GAS MIXTURE

TEXT B3.7.5.3 0 11/19/2002
Title: PLANT SYSTEMS BASES LIQUID HOLDUP TANKS

TEXT B3.7.6 2 06/27/2008
Title: PLANT SYSTEMS BASES ESSW PUMPHOUSE VENTILATION

TEXT B3.7.7 2 01/31/2008
Title: PLANT SYSTEMS BASES MAIN CONDENSER OFFGAS PRETREATMENT LOGARITHMIC RADIATION MONITORING INSTRUMENTATION

TEXT B3.7.8 3 06/21/2007
Title: PLANT SYSTEMS BASES SNUBBERS

TEXT B3.7.9 1 12/14/2004
Title: PLANT SYSTEMS BASES CONTROL STRUCTURE HVAC

TEXT B3.7.10 1 12/14/2004
Title: PLANT SYSTEMS BASES SPENT FUEL STORAGE POOLS

Manual Name: TRM2

Manual Title: TECHNICAL REQUIREMENTS MANUAL UNIT 2

TEXT B3.7.11 1 10/02/2009
Title: STRUCTURAL INTEGRITY

TEXT B3.8.1 2 03/10/2010
Title: ELECTRICAL POWER BASES PRIMARY CONTAINMENT PENETRATION CONDUCTOR OVERCURRENT PROTECTIVE DEVICES

TEXT B3.8.2.1 0 11/19/2002
Title: ELECTRICAL POWER BASES MOTOR OPERATED VALVES (MOV) THERMAL OVERLOAD PROTECTION - CONTINUOUS

TEXT B3.8.2.2 1 09/17/2004
Title: ELECTRICAL POWER BASES MOTOR OPERATED VALVES (MOV) THERMAL OVERLOAD PROTECTION - AUTOMATIC

TEXT B3.8.3 0 11/19/2002
Title: ELECTRICAL POWER BASES DIESEL GENERATOR (DG) MAINTENANCE ACTIVITIES

TEXT B3.8.4 0 11/19/2002
Title: ELECTRICAL POWER BASES 24 VDC ELECTRICAL POWER SUBSYSTEM

TEXT B3.8.5 0 11/19/2002
Title: ELECTRICAL POWER BASES DEGRADED VOLTAGE PROTECTION

TEXT B3.8.6 1 02/04/2005
Title: ELECTRICAL POWER BASES EMERGENCY SWITCHGEAR ROOM COOLING

TEXT B3.8.7 1 06/15/2009
Title: BATTERY MAINTENANCE AND MONITORING PROGRAM

TEXT B3.9.1 0 11/19/2002
Title: REFUELING OPERATIONS BASES DECAY TIME

TEXT B3.9.2 0 11/19/2002
Title: REFUELING OPERATIONS BASES COMMUNICATIONS

TEXT B3.9.3 0 11/19/2002
Title: REFUELING OPERATIONS BASES REFUELING PLATFORM

Manual Name: TRM2

Manual Title: TECHNICAL REQUIREMENTS MANUAL UNIT 2

TEXT B3.10.1 0 11/19/2002
Title: MISCELLANEOUS BASES SEALED SOURCE CONTAMINATION

TEXT B3.10.2 1 04/10/2007
Title: MISCELLANEOUS BASES SHUTDOWN MARGIN TEST RPS INSTRUMENTATION

TEXT B3.10.3 0 11/19/2002
Title: MISCELLANEOUS BASES INDEPENDENT SPENT FUEL STORAGE INSTALLATION (ISFSI)

TEXT B3.11.1.1 0 11/19/2002
Title: RADIOACTIVE EFFLUENTS BASES LIQUID EFFLUENTS CONCENTRATION

TEXT B3.11.1.2 0 11/19/2002
Title: RADIOACTIVE EFFLUENTS BASES LIQUID EFFLUENTS DOSE

TEXT B3.11.1.3 0 11/19/2002
Title: RADIOACTIVE EFFLUENTS BASES LIQUID WASTE TREATMENT SYSTEM

TEXT B3.11.1.4 0 11/19/2002
Title: RADIOACTIVE EFFLUENTS BASES LIQUID RADWASTE EFFLUENT MONITORING INSTRUMENTATION

TEXT B3.11.1.5 0 11/19/2002
Title: RADIOACTIVE EFFLUENTS BASES RADIOACTIVE LIQUID PROCESS MONITORING INSTRUMENTATION

TEXT B3.11.2.1 1 12/14/2004
Title: RADIOACTIVE EFFLUENTS BASES DOSE RATE

TEXT B3.11.2.2 0 11/19/2002
Title: RADIOACTIVE EFFLUENTS BASES DOSE - NOBLE GASES

TEXT B3.11.2.3 0 11/19/2002
Title: RADIOACTIVE EFFLUENTS BASES DOSE - IODINE, TRITIUM, AND RADIONUCLIDES IN PARTICULATES FORM

TEXT B3.11.2.4 0 11/19/2002
Title: RADIOACTIVE EFFLUENTS BASES GASEOUS RADWASTE TREATMENT SYSTEM

Manual Name: TRM2

Manual Title: TECHNICAL REQUIREMENTS MANUAL UNIT 2

TEXT B3.11.2.5 4 11/14/2006
Title: RADIOACTIVE EFFLUENTS BASES VENTILATION EXHAUST TREATMENT SYSTEM

TEXT B3.11.2.6 1 01/27/2004
Title: RADIOACTIVE EFFLUENTS BASES RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

TEXT B3.11.3 0 11/19/2002
Title: RADIOACTIVE EFFLUENTS BASES TOTAL DOSE

TEXT B3.11.4.1 2 01/06/2006
Title: RADIOACTIVE EFFLUENTS BASES MONITORING PROGRAM

TEXT B3.11.4.2 0 11/19/2002
Title: RADIOACTIVE EFFLUENTS BASES LAND USE CENSUS

TEXT B3.11.4.3 0 11/19/2002
Title: RADIOACTIVE EFFLUENTS BASES INTERLABORATORY COMPARISON PROGRAM

TEXT B3.12.1 1 10/04/2007
Title: LOADS CONTROL PROGRAM BASES CRANE TRAVEL-SPENT FUEL STORAGE POOL

TEXT B3.12.2 0 11/19/2002
Title: LOADS CONTROL PROGRAM BASES HEAVY LOADS REQUIREMENTS

TEXT B3.12.3 0 11/19/2002
Title: LOADS CONTROL PROGRAM BASES LIGHT LOADS REQUIREMENTS

Section	Title	Effective Date
3.7	PLANT SYSTEMS	
	Pages TRM / 3.7-1 and TRM / 3.7-2	07/29/1999
	Page 3.7-3	08/31/1998
	Page TRM / 3.7-4	03/31/2006
	Page TRM / 3.7-5	04/07/2009
	Pages TRM / 3.7-6 through TRM / 3.7-8	08/02/1999
	Pages TRM / 3.7-9 and TRM / 3.7-10	04/07/2009
	Page TRM / 3.7-11	01/21/2000
	Page TRM / 3.7-12	08/02/1999
	Page TRM / 3.7-13	04/07/2009
	Page TRM / 3.7-14	08/09/2005
	Pages TRM / 3.7-15 and TRM / 3.7-16	08/02/1999
	Page TRM / 3.7-17	04/07/2009
	Page TRM / 3.7-18	08/02/1999
	Page TRM / 3.7-19	04/07/2009
	Pages TRM / 3.7-20 through TRM / 3.7-22	08/02/1999
	Page TRM / 3.7-23	04/07/2009
	Page TRM / 3.7-24	03/31/2006
	Pages TRM / 3.7-25 and TRM / 3.7-26	08/02/1999
	Page TRM / 3.7-27	10/31/2007
	Page TRM / 3.7-28	11/29/2006
	Page TRM / 3.7-29	01/13/2010
	Page TRM / 3.7-30	11/30/2005
	Page TRM / 3.7-31	11/16/2001
	Page TRM / 3.7-32	01/09/2004
	Page TRM / 3.7-33	10/05/2002
	Page TRM / 3.7-34	03/31/2006
	Pages TRM / 3.7-35 and TRM / 3.7-36	02/01/1999
	Pages 3.7-37 through 3.7-38	08/31/1998
	Page TRM / 3.7-39	03/31/2006
	Page TRM / 3.7-40	02/14/2005
	Page TRM / 3.7-40a	06/20/2008
	Page TRM / 3.7-41	09/04/2008
	Page TRM / 3.7-42	08/31/1998
	Pages TRM / 3.7-43 through TRM / 3.7-45	10/05/2006
	Page TRM / 3.7-46	06/07/2007
	Page TRM / 3.7-47	10/05/2006
	Page TRM / 3.7-48	06/07/2007
	Page TRM / 3.7-49	03/09/2001
	Page TRM / 3.7-50	08/16/2006
	Page TRM / 3.7-51	12/03/2004
	Page TRM / 3.7-52	04/15/2003
	Page TRM / 3.7-53	07/29/1999
	Page TRM / 3.7-54	04/01/2009
	Page TRM / 3.7-55	09/25/2009
	Page TRM / 3.7-56	04/01/2009

TRM2 text LOES.doc
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.

(continued)

B 3.8.1 Primary Containment Penetration Conductor Overcurrent Protective Devices

BASES

ACTIONS (continued)

B.1

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 ≥ 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) circuit breakers, and

(continued)

B 3.8.1 Primary Containment Penetration Conductor Overcurrent Protective Devices

BASES

TRS (continued)

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 that the pickup current is less than 120% of the nominal relay pickup current, and that the measured response time is within ±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.

REFERENCES None