

October 15, 2010

ATTN: Document Control Desk  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Serial No. 10-598  
LIC/GOR/R0  
Docket No.: 50-305  
License No.: DPR-43

**DOMINION ENERGY KEWAUNEE, INC.**  
**KEWAUNEE POWER STATION**  
**LICENSE AMENDMENT REQUEST 249: KEWAUNEE POWER STATION**  
**CONVERSION TO IMPROVED TECHNICAL SPECIFICATIONS (TAC NO. ME2139) –**  
**SUPPLEMENT TO VOLUME 8**

By letter dated August 24, 2009 (reference 1), as supplemented by letters dated October 22, 2009, (reference 2), May 12, (reference 3), April 13, (two letters) (references 4 and 5), July 1, (reference 6), July 16, (reference 7), August 18, (reference 8), September 7 (reference 9), and September 8, 2010 (reference 10), Dominion Energy Kewaunee, Inc. (DEK) submitted an application to amend the Kewaunee Power Station (Kewaunee) Technical Specifications. This application, License Amendment Request 249 (LAR 249), requested a conversion of the current Technical Specifications (CTS) to the Improved Technical Specifications (ITS), consistent with the Improved Standard Technical Specifications (ISTS) as described in NUREG-1431, "Standard Technical Specifications - Westinghouse Plants," Revision 3.0, and certain generic changes to the NUREG.

The purpose of this letter is to supplement the original license amendment request to address instances identified during the validation process where the Kewaunee design does not support implementation of the proposed ITS. These instances are associated with the Reactor Protection System (RPS) and the Engineered Safety Features Actuation System (ESFAS) Actuation Logic Tests. Some features cannot be tested under the conditions specified in the proposed Kewaunee ITS LAR because Kewaunee does not have the ability to cycle the logic contacts under these conditions. Kewaunee cannot test one feature at power because a plant trip would result. Attachment 1 contains the supplemental proposed changes and basis for the changes.

Previous letters dated July 1, 2010 (reference 6), July 16, 2010 (reference 7) and August 18, 2010 (reference 8), provided supplements to Revision 0 Volumes. The previous letter dated September 8, 2010 (reference 10), provided changes to the Revision 1 Volumes. This letter modifies the Revision 2 files for Volume 8 submitted in Reference 10 but does not replace Revision 2. The affected Revision 2 pages are included in Attachment 1 and the changes are colored red to aid in identification.

ADD  
NRM

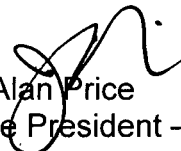
DEK has evaluated these proposed changes in accordance with 10 CFR 50.91(a)(1) using the criteria of 10 CFR 50.92(c), and has concluded that the determination of no significant hazards considerations in the original ITS submittal remains valid. In addition, DEK has determined that the proposed amendment, including this supplement to the original ITS submittal, continues to meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(b), and no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

DEK continues to request approval of the proposed amendment and an implementation period as stated in Reference 1.

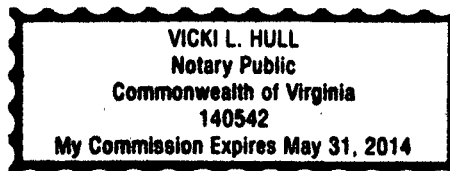
A copy of this supplement has been provided to the State of Wisconsin in accordance with 10 CFR 50.91(b).

If you have any questions or require additional information, please contact Mr. Gerald O. Riste at (920) 388-8424.

Very truly yours,

  
J. Alan Price  
Vice President – Nuclear Engineering


COMMONWEALTH OF VIRGINIA     )  
  )  
COUNTY OF HENRICO            )



The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by J. Alan Price, who is Vice President - Nuclear Engineering of Dominion Energy Kewaunee, Inc. He has affirmed before me that he is duly authorized to execute and file the foregoing document in behalf of that Company, and the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 15<sup>TH</sup> day of October, 2010.

My Commission expires: May 31, 2014

  
\_\_\_\_\_  
Notary Public

Attachments:

1. Kewaunee ITS Submittal, Supplement to Volume 8, Revision 2

Commitments made by this letter: None

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References:

1. Letter from Leslie N. Hartz (DEK) to Document Control Desk (NRC), "License Amendment Request 249: Kewaunee Power Station Conversion to Improved Technical Specifications (TAC NO. ME02467)," dated August 24, 2009. [ADAMS Accession No. ML092440398]
2. Letter from J. Alan Price (DEK) to Document Control Desk (NRC), "License Amendment Request 249: Conversion to Improved Technical Specifications - Setpoint Methodology Supplement (TAC NO. ME02467)," dated October 22, 2009. [ADAMS Accession No. ML093070096]
3. Letter from J. Alan Price (DEK) to Document Control Desk (NRC), "License Amendment Request 249: Kewaunee Power Station Conversion to Improved Technical Specifications – Request to Change Proposed Service Water And Main Steam Isolation Valve Specifications," dated May 12, 2010. [ADAMS Accession No. ML101380399]
4. Letter from J. Alan Price (DEK) to Document Control Desk (NRC), "License Amendment Request 249 (TAC No. ME02467) Conversion to Improved Technical Specifications Response to Request for Additional Information RE: TSTF-490," dated April 13, 2010. [ADAMS Accession No. ML101060517]
5. Letter from J. Alan Price (DEK) to Document Control Desk (NRC), "License Amendment Request 249: (TAC No. ME02467) Conversion to Improved Technical Specifications - Setpoint Methodology," dated April 13, 2010. [ADAMS Accession No. ML101040090]
6. Letter from J. Alan Price (DEK) to Document Control Desk (NRC), "License Amendment Request 249: Kewaunee Power Station Conversion to Improved Technical Specifications (TAC NO. ME2139) – Supplement to Volumes 3, 4, 5, 6, 9, 11, And 15 and Proposed License Conditions," dated July 1, 2010. [ADAMS Accession No. ML101890176]
7. Letter from J. Alan Price (DEK) to Document Control Desk (NRC), "License Amendment Request 249: Kewaunee Power Station Conversion to Improved Technical Specifications (TAC NO. ME2139) – Supplement to Volumes 7, 10, 12, and 16, and Proposed License Conditions," dated July 16, 2010. [ADAMS Accession No. ML102370370]
8. Letter from Leslie N. Hartz (DEK) to Document Control Desk (NRC), "License Amendment Request 249: Kewaunee Power Station Conversion to Improved Technical Specifications (TAC NO. ME2139) – Supplement to Volumes 1, 2, 8, 13 and 14," dated August 18, 2010. [ADAMS Accession No. ML102371064]

9. Letter from Leslie N. Hartz (DEK) to Document Control Desk (NRC), "License Amendment Request 249: Kewaunee Power Station Conversion to Improved Technical Specifications (TAC NO. ME2139) – Submittal of Information Requested by NRC Staff," dated September 7, 2010. [ADAMS Accession No. ML02730383]
10. Letter from Leslie N. Hartz (DEK) to Document Control Desk (NRC), "License Amendment Request 249: Kewaunee Power Station Conversion to Improved Technical Specifications (TAC NO. ME2139) – Supplement to Volumes 8 and 16," dated September 8, 2010. [ADAMS Accession No. ML102580700]

**ATTACHMENT 1**

**LICENSE AMENDMENT REQUEST 249: KEWAUNEE POWER STATION  
CONVERSION TO IMPROVED TECHNICAL SPECIFICATIONS (TAC NO. ME2139)  
SUPPLEMENT TO VOLUME 8**

**KEWAUNEE ITS SUBMITTAL  
SUPPLEMENT TO VOLUME 8, REVISION 2**

**KEWAUNEE POWER STATION  
DOMINION ENERGY KEWAUNEE, INC.**

Table 3.3.1-1  
Function

**TABLE TS 4.1-1** SR 3.3.1.5, SR 3.3.1.13  
**MINIMUM FREQUENCIES FOR CHECKS, CALIBRATIONS AND TEST OF INSTRUMENT CHANNELS**

CHANNEL DESCRIPTION	CHECK	CALIBRATE	TEST	REMARKS
24. Turbine First Stage Pressure	Each shift -1	Each refueling cycle -10	Monthly <sup>-13</sup>	18 months L08
25. Deleted				See ITS 3.8.1
26. Protective System Logic Channel Testing	Not applicable	Not applicable	Monthly <sup>-5</sup>	Includes auto load sequencer 92 days on STAGGERED TEST BASIS L09 M12
27. Deleted				Add proposed Applicability and number of Required Channels A12
28. Deleted				Add proposed ACTION N L14
29. Seismic Monitoring System	Each refueling cycle	Each refueling cycle	Not applicable	See ITS 3.3.3
30. Fore Bay Water Level	Not applicable	Each refueling cycle	Each refueling cycle	See ITS 3.7.8
31. AFW Flow Rate	(a)	Each refueling cycle	Not applicable	(a) Flow rate indication will be checked at each unit startup and shutdown
32. PORV Position Indication	Monthly	Each refueling cycle	Not applicable	
a. Back-up (Temperature)	Monthly	Each refueling cycle	Not applicable	
33. PORV Block Valve Position Indicator	Monthly	Each refueling cycle	Not applicable	

Add proposed SR 3.3.1.13 for Function 16.a

Add proposed SR 3.3.1.11 for Functions 16.a, 16.c and 16.d

Add proposed SR 3.3.1.5 for Function 16.b

Add proposed SR 3.3.1.10 for Function 20.a and  
SR 3.3.1.15 for Functions 20.a and 20.b

Add proposed note 3 to SR 3.3.1.5 and add SR 3.3.1.16

Add proposed note 2 for functions 2b, 4, and 5 to SR 3.3.1.5

See ITS  
3.3.3

M14

M15

A14

Amendment No. 182  
04/06/2005

A15

Page 10 of 15



**DISCUSSION OF CHANGES****ITS 3.3.1, REACTOR PROTECTION SYSTEM (RPS) INSTRUMENTATION**

number of Protective System Logic Channel trains that are required to be OPERABLE, both trains are required to support OPERABILITY of all the required RPS channels. This change is designated as administrative because it does not result in technical changes to the CTS.

- A13 Note (b) to CTS Table TS 4.1-1 Channel Description 2 (Nuclear Intermediate Range) states in the Remarks Sections to "log level" during the performance of the CHANNEL FUNCTIONAL TEST. ITS Table 3.3.1-1 Function 4 (Intermediate Range Neutron Flux) requires performance of a COT (SR 3.3.1.8), but does not contain a specific requirement to "log level." This changes the CTS by deleting the specific requirement to "log level" during the performance of the COT.

The purpose of Note (b) to CTS Table TS 4.1-1 Channel Description 2 is to ensure that the Nuclear Intermediate Range instrumentation is OPERABLE. This change is acceptable because this requirement duplicates the requirements of 10 CFR 50 Appendix B, Section XVII (Quality Assurance Records) to maintain records of activities affecting quality, including the results of tests (i.e., Technical Specification Surveillances). Compliance with 10 CFR 50 Appendix B is required in the KPS Operating License, which is adequate to ensure appropriate data is taken and maintained. The details of the regulations within the Technical Specifications are repetitious and unnecessary. Therefore, retaining the requirement to perform the associated Surveillance and eliminating the details from Technical Specification that are found in 10 CFR 50 Appendix B is considered a presentation preference. As such, this change is considered an administrative change.



Insert 1



Insert 2

**MORE RESTRICTIVE CHANGES**

- M01 CTS 3.5.c states, in part, that when the number of channels of a subsystem fall below the limits given in Table TS 3.5-2 Column 3 operation shall be limited according to the requirement shown in Column 6 as soon as practicable. Table TS 3.5-2 Functional Unit 1 (Manual Reactor Trip) Column 3 requires one Manual Reactor Trip channel to OPERABLE. Thus, while there are two Reactor Manual Trip channels in the KPS design, the CTS allows one of the Reactor Manual Trip channels to be inoperable for an indefinite amount of time; no actions are required when one of the two Manual Reactor Trip channels is inoperable. ITS LCO 3.3.1 requires the RPS instrumentation in Table 3.3.1-1 to be OPERABLE. ITS Table 3.3.1-1 Function 1 requires two Manual Reactor Trip channels to be OPERABLE. ITS 3.3.1 ACTION B provides compensatory actions to take with one Manual Reactor Trip channel inoperable and requires restoration of the channel to OPERABLE status within 48 hours or to be in MODE 3 within 54 hours. This changes the CTS by requiring two channels of the Manual Reactor Trip Functional Unit to be OPERABLE instead of one channel and by adding a specific ACTION to take when one of two required channels is inoperable.

The purpose of the new ITS channel requirement and proposed ACTION is to ensure that appropriate compensatory actions are taken if any of the installed Manual Reactor Trip channels are inoperable. This change is acceptable because the new channel requirement in ITS Table 3.3.1-1 will ensure that all of



#### Insert 1

- A14 CTS Table TS 4.1-1, "Minimum Frequencies for Checks, Calibrations and Test of Instrument Channels, "Channel Description 26, "Protective System Logic Channel Testing," requires monthly testing of the Protective System Logic Channels. CTS 1.0.h.4, "Protection System," states that the Protection System consists of both the Reactor Protection System (RPS) and the Engineered Safety Features System (ESFS). Two logic matrices of the RPS Logic Matrix and one function listed in CTS Table 3.5-2 are not included in this monthly RPS Protective System Logic Channel Test. The two logic matrices not included are 1) the Safety Injection - Reactor Trip matrix and 2) the Reactor Coolant Pump Breaker- Reactor Trip matrix. The function listed in CTS Table 3.5-2 that is not required to be tested in the RPS Logic Test is Function 14, Underfrequency 4-kV Bus. CTS Table TS 4.1-3, "Minimum Frequencies for Equipment Tests," Equipment Test 1b, Reactor Coolant Pump Breakers-Open-Reactor Trip, and CTS 4.6.a.2 test these features each refueling outage or on a refueling interval. ITS SR 3.3.1.5, Note 3; SR 3.3.1.16; and SR 3.8.1.16 ensure these features are tested on the same frequency, 18-months. Because the CTS testing of these features on an 18-month frequency (refueling), this change clarifies the current testing requirements and is considered administrative.

Other CTS testing requirements cover Kewaunee Protection System Logic channel matrices for the Safety Injection-Reactor Trip and the Reactor Coolant Pump (RCP) Breaker-Reactor Trip features. The RCP breaker position testing is controlled by CTS Table 4.1-3, "Minimum Frequencies for Equipment Tests," Equipment Test 1b, Reactor Coolant Pump Breakers-Open-Reactor Trip. Equipment Test 1b requires testing of this function for operability each refueling outage. The Safety Injection-Reactor Trip testing is controlled by CTS surveillance 4.6.a.2, where a test of the automatic start of each diesel generator, load shedding, and restoration to operation of particular vital equipment, initiated by a simulated loss of normal a-c station service power supplies together with a simulated safety injection signal is performed. CTS Table TS 3.5-2, Function 14, does not have a matrix in the Protection System channel but provides a trip of the RCPs, as stated, by Note 4, included with CTS Table TS 3.5-2, Function 14. The design of Kewaunee Power Station is such that if the Reactor Coolant Pump Breaker for the Reactor Protection system logic channel were tested at-power, a plant trip would occur. The Safety Injection - Reactor Trip feature cannot be tested at power because Kewaunee's design will not allow cycling of the slave relays at power. Additionally, the Underfrequency 4-kV Bus circuit trips the RCP, which then generates a reactor trip signal. Therefore, Kewaunee's design and CTS support testing these functions on an 18-month frequency.

## Insert 2

- A15 CTS 3.5.c states, in part, that when the number of channels of a subsystem fall below the limits given in Table TS 3.5-2 Column 3, operation shall be limited according to the requirement shown in Column 6 as soon as practicable. Table TS 3.5-2 Functional Unit 3 (Nuclear Flux Intermediate Range), Column 3 requires one Nuclear Flux Intermediate Range channel to be OPERABLE and Table TS 3.5-2 Functional Unit 4 (Nuclear Flux Source Range), Column 3 requires one Nuclear Flux Source Range channel to be OPERABLE. Column 6 for the requirements associated with Functional Units 3 and 4 is modified by a note, Note 3. Note 3 states that when a block condition exists, maintain normal operation. The block (bypass) condition for Functional Unit 3 is P-10 while the block (bypass) condition for Functional Unit 4 is P-6. Therefore, when the plant is operating in a condition where the block condition is satisfied and the minimum operable channels for these Functional Units do not meet the Column 3 requirements, normal operation can still be maintained. When plant operating conditions change such that the block condition is no longer satisfied, the requirements of Column 6 apply and the plant must be brought to the Hot Shutdown condition as soon as practicable. Although CTS Table 3.5-2 Functional Unit 2, Nuclear Flux Power Range – Low Setting, Column 6 does not contain this same note (Note 3), it does have a permissible bypass condition (Column 5) of P-10. ISTS does not provide this allowance. Therefore, the Note in SR 3.3.1.5 is being modified to not only include P-7 (Function 16.b) but to also include Function 2.b, 4, and 5 for Function 19. This changes ITS to include similar requirements that are in CTS. These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.



CTS

All changes are (1)  
unless otherwise noted

RIS Instrumentation  
3.3.1

## SURVEILLANCE REQUIREMENTS (continued)

	SURVEILLANCE	FREQUENCY
Table TS 4.1-1 Channel Description 1	<p>SR 3.3.1.3</p> <p>-----NOTE----- Not required to be performed until 24 hours after THERMAL POWER is <math>\geq 15\%</math> RTP.</p> <p>Compare results of the incore detector measurements to Nuclear Instrumentation System (NIS) AFD. Adjust NIS channel if absolute difference is <math>\geq 3\%</math>.</p>	<p>31 effective full power days (EFPD)</p>
Table TS 4.1-3 Equipment Test 1.a	<p>SR 3.3.1.4</p> <p>-----NOTE----- This Surveillance must be performed on the reactor trip bypass breaker prior to placing the bypass breaker in service.</p> <p>Perform TADOT.</p>	<p>31 62 days on a STAGGERED TEST BASIS</p>
Table TS 4.1-1 Channel Description 26	<p>SR 3.3.1.5</p> <p>Perform ACTUATION LOGIC TEST.</p>	<p>92 days on a STAGGERED TEST BASIS</p>

(2)

(11)

(12)

1.

S

## NOTE

For Function 16.b, when  $\geq 10\%$  RTP, the SR consists  
only of verifying the P-7 interlock is in its required state.  
However, all applicable requirements of an  
ACTUATION LOGIC TEST are required to be  
performed within 12 hours of reducing THERMAL  
POWER to  $< 10\%$  RTP

2. For Function 19, testing the logic matrix associated with  
Functions 2.b, 4, and 5, when  $\geq 10\%$  RTP consists only of  
verifying the logic is in its required state. However, all  
applicable requirements of an ACTUATION LOGIC TEST are  
required to be performed within 12 hours of reducing  
THERMAL POWER to  $< 10\%$  RTP.

3. For Function 19, this SR does not include testing the logic matrices  
associated with Functions 11.a, 11.b, 13, (tested by SR 3.3.1.16) and  
Safety Injection-Reactor Trip (tested by SR 3.8.1.16).

WOG STS

3.3.1-10

Rev. 3.0, 03/31/04

CTS

All changes are (1)  
unless otherwise noted

RTS Instrumentation  
3.3.1

## SURVEILLANCE REQUIREMENTS (continued)

DOC M15

SURVEILLANCE	FREQUENCY
<p>SR 3.3.1.15 -----NOTE----- Verification of setpoint is not required. -----</p> <p>Perform TADOT.</p>	<p>Prior to exceeding the [P-9] interlock whenever the unit has been in MODE 3, if not performed within the previous 31 days</p>
<p>SR 3.3.1.16 -----NOTE----- Neutron detectors are excluded from response time testing. -----</p> <p>Verify RTS RESPONSE TIME is within limits.</p>	<p>[18] months on a STAGGERED TEST BASIS</p>

SR 3.3.1.16

Perform ACTUATION LOGIC TEST for  
Functions 11.a, 11.b, and 13.

18 months

CTS

All changes are (1)  
unless otherwise noted

RTS Instrumentation  
3.3.1

Table 3.3.1-1 (page 5 of 7)  
Reactor Trip System Instrumentation

5

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	NOMINAL <sup>(j)</sup> TRIP SETPOINT	
Table TS 3.5-2 Functional Unit 17, Table TS 4.1-3 Equipment Test 1.a, DOC M09  20. 18	Reactor Trip Breaker Undervoltage and Shunt Trip Mechanisms	1,2	2 → 1 each per RTB	R → S	SR 3.3.1.4	NA / NA	4 5
		3 <sup>(b)</sup> , 4 <sup>(b)</sup> , 5 <sup>(b)</sup>	2 → 1 each per RTB	C	SR 3.3.1.4	NA / NA	4 5
Table TS 4.1-1 Channel Description 26, DOC A12, DOC L14  21. 19	Automatic Trip Logic	1,2	2 trains	N → Ø	SR 3.3.1.5	NA / NA	4 5
		3 <sup>(b)</sup> , 4 <sup>(b)</sup> , 5 <sup>(b)</sup>	2 trains	C	SR 3.3.1.5	NA / NA	5
REVIEWER'S NOTE							
(b) With Rod Control System capable of rod withdrawal or one or more rods not fully inserted.							
(j) Unit specific implementations may contain only Allowable Value depending on Setpoint Study methodology used by the unit.							

Move  
Function 20  
here from  
page 3.3.1-17

SR 3.3.1.16



TABLE TS 4.1-1

Table 3.3.1-1  
Functions 1.a,  
2.b, 3.b, 4.b,  
5.a, and 6.a

# MINIMUM FREQUENCIES FOR CHECKS, CALIBRATIONS AND TEST OF INSTRUMENT CHANNELS

CHANNEL DESCRIPTION	CHECK	CALIBRATE	TEST	REMARKS
24. Turbine First Stage Pressure	Each shift -1	Each refueling cycle	Monthly	See ITS 3.3.1
25. Deleted				See ITS 3.8.1
26. Protective System Logic Channel Testing	Not applicable	Not applicable	Monthly SR 3.3.2.2	Includes auto load sequencer 92 days on STAGGERED TEST BASIS L09
27. Deleted				
28. Deleted				
29. Seismic Monitoring System	Each refueling cycle	Each refueling cycle	Not applicable	See ITS 3.3.3
30. Fore Bay Water Level	Not applicable	Each refueling cycle	Each refueling cycle	See ITS 3.7.8
31. AFW Flow Rate	(a)	Each refueling cycle	Not applicable	(a) Flow rate indication will be checked at each unit startup and shutdown
32. PORV Position Indication	Monthly	Each refueling cycle	Not applicable	
a. Back-up (Temperature)	Monthly	Each refueling cycle	Not applicable	
33. PORV Block Valve Position Indicator	Monthly	Each refueling cycle	Not applicable	

See ITS  
3.3.3

Add proposed SR 3.3.2.2 Note for Function 4.b

A15

**DISCUSSION OF CHANGES**  
**ITS 3.3.2, ENGINEERED SAFETY FEATURE ACTUATION SYSTEM (ESFAS)**  
**INSTRUMENTATION**

"Service Water System." This changes the CTS by explicitly stating the Required Action and Completion Time for inoperable trains or channels of the Turbine Building Service Water Header Isolation logic.

This change is acceptable since the requirements are not being changed. Both the CTS and ITS require declaring the associated Service Water train inoperable when a train or channel of the Turbine Building Service Water Header Isolation logic. This change is designated as administrative because it does not result in technical changes to the CTS.

- A13 CTS Table TS 4.1-1 specifies the applicable testing requirements for the Protective System Logic Channels. Although the CTS does not provide a specific Applicability nor a specific number of Required Channels, all ESFAS Protective System Logic Channels are required to be OPERABLE when any of the associated ESFAS channels are required. ITS Table 3.3.2-1 Functions 1.b, 2.b, 3.b, 4.b, 5.a, and 6.a require two trains of the Automatic Actuation Logic and Actuation Relays to be OPERABLE. ITS Table 3.3.2-1 Functions 1.b, 2.b, and 3.b are required to be OPERABLE in MODES 1, 2, 3, and 4. ITS Table 3.3.2-1 Function 4.b is required to be OPERABLE in MODE 1 and MODES 2 and 3 except when all MSIVs are closed and deactivated. ITS Table 3.3.2-1 Function 5.a is required to be OPERABLE in MODE 1 and MODES 2 and 3 except when all MFIVs, MFRVs, and associated bypass valves are closed and de-activated or isolated by a closed manual valve. ITS Table 3.3.2-1 Function 6.a is required to be OPERABLE in MODES 1, 2, and 3. This changes the CTS by explicitly stating the requirements for the Automatic Actuation Logic and Actuation Relays.

This change is acceptable because the requirements are the same. ITS 3.3.2 explicitly states the number of required channels as well as the Applicability requirements in ITS Table 3.3.2-1. Although the CTS does not specify the number of ESFAS Protective System Logic Channel trains that are required to be OPERABLE, both trains are required to support OPERABILITY of the associated ESFAS channels. This change is designated as administrative because it does not result in technical changes to the CTS.

- A14 CTS 3.3.e.1.A.3 requires the turbine building service water header isolation logic to be OPERABLE. However, no specific channel description of the logic is provided. ITS Table 3.3.2-1 Function 7 covers this logic. Function 7.a requires two trains of the Automatic Actuation Logic and Actuation Relays to be OPERABLE. Function 7.b requires two channels of the Service Water Pressure – Low to be OPERABLE. This changes the CTS by explicitly stating the logic requirements.

This change is acceptable because the requirements are the same. ITS 3.3.2 explicitly states the required number of channels and trains in ITS Table 3.3.2-1 Functions 7.a and 7.b. Although the CTS does not specify the number of channels and trains that are required to be OPERABLE, all the channels and trains are required for the logic to function properly. The number of trains and

← Insert 1



### Insert 1

- A15 CTS Table TS 4.1-1, Channel Description 26, Protective System Logic Channel Testing requires testing of the Engineered Safety Features Logic Channel. Current testing either verifies the Hi Steam Flow logic is in the required state when steam flow is  $\geq$  the Hi Steam Flow nominal trip setpoint or performs the logic testing when steam flow is  $<$  the Hi Steam Flow nominal trip setpoint. ISTS Table 3.3.2-1, Function 4b, Steam Line Isolation – Automatic Actuation Logic and Actuation Relays, requires SR 3.3.2.2 to be performed. SR 3.3.2.2 is an ACTUATION LOGIC TEST that is required to be performed every 92 days on a STAGGERED TEST BASIS. At KPS, the Hi Steam Flow matrix of Function 4.d cannot be tested when steam flow is  $\geq$  the Hi Steam Flow nominal trip setpoint, because the Hi Steam Flow relays cannot be cycled due to plant design. Therefore, a Note has been added for this Function that states "For Function 4.b, when steam flow is  $\geq$  the Hi Steam Flow nominal trip setpoint, the Hi Steam Flow logic portion of this SR consists only of verifying the Hi Steam Flow logic is in its required state. However, all applicable requirements of an ACTUATION LOGIC TEST are required to be performed within 12 hours of reducing steam flow  $<$  the Hi Steam Flow nominal trip setpoint." This will allow Hi Steam Flow matrix of Steam Line Isolation circuit to not be performed during this SR when steam flow is  $\geq$  the High Steam Flow nominal trip setpoint, except for verifying that the interlock is in the required state, but still require the SR to be met. Furthermore, anytime power is reduced below the Hi Steam Flow nominal trip setpoint, then all requirements of an ACTUATION LOGIC TEST would either have to be current (i.e., performed within the last 92 days on a STAGGERED TEST BASIS) or be performed within 12 hours after the power reduction to below the Hi Steam Flow nominal trip setpoint. In addition, prior to entering the Applicability of Function 4.b (which is MODE 1, 2, and 3 with the MSIVs open or activated), the SR would also have to be current. This ensures the Steam Line Isolation automatic actuation logic and actuation relays are properly tested prior to entering MODE 1, Modes 2, or 3 with a MSIV open or activated, and when in MODE 1, 2, or 3 with steam flow  $<$  the Hi Steam Flow nominal trip setpoint for an extended time.

These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS and are consistent with current plant design.

CTS

All changes are (1)  
unless otherwise noted

ESFAS Instrumentation  
3.3.2

## SURVEILLANCE REQUIREMENTS

NOTE

4.1.a

Refer to Table 3.3.2-1 to determine which SRs apply for each ESFAS Function.

Table TS 4.1-1,  
Channel  
Descriptions 7,  
11.a, 11.b,  
18.a, 18.b, 18.c

## SURVEILLANCE

## FREQUENCY

SR 3.3.2.1

Perform CHANNEL CHECK.

12 hours

Table TS 4.1-1,  
Channel  
Description 26

SR 3.3.2.2

Perform ACTUATION LOGIC TEST.

92 days on a  
STAGGERED  
TEST BASIS

## Note

For Function 4.b, when steam flow is  $\geq$  the Hi Steam Flow nominal trip setpoint, the Hi Steam Flow logic portion of this SR consists only of verifying the Hi Steam Flow logic is in its required state. However, all applicable requirements of an ACTUATION LOGIC TEST are required to be performed within 12 hours of reducing steam flow  $<$  the Hi Steam Flow nominal trip setpoint.

Perform ACTUATION LOGIC TEST.

31 days on a  
STAGGERED  
TEST BASIS

## REVIEWER'S NOTE

The Frequency remains at 31 days on a STAGGERED TEST BASIS for plants with a Relay Protection System.

SR 3.3.2.4

Perform MASTER RELAY TEST.

92 days on a  
STAGGERED  
TEST BASIS

Table TS 4.1-1,  
Channel  
Descriptions 7,  
11.a, 11.b,  
18.a, 18.b,  
18.c, and 35

SR 3.3.2.5

Perform COT.

in accordance with the  
Setpoint Control Program

184 days

SR 3.3.2.6

Perform SLAVE RELAY TEST.

[92] days

DOC M14

SR 3.3.2.7

NOTE  
Verification of relay setpoints not required.

Perform TADOT.

[92] days