

BASES

ACTIONS (continued)

C.1

Condition C applies when the Required Action and associated Completion Time for Condition A or B have not been met and [recently] irradiated fuel assemblies are being moved in the fuel building. Movement of [recently] irradiated fuel assemblies in the fuel building must be suspended immediately to eliminate the potential for events that could require FBACS actuation.

D.1 and D.2

Condition D applies when the Required Action and associated Completion Time for Condition A or B have not been met and the unit is in MODE 1, 2, 3, or 4. The unit must be brought to a MODE in which ~~the LCO requirements are not applicable~~ overall plant risk is reduced. To achieve this status, the unit must be brought to MODE 3 within 6 hours and MODE ~~5-4~~ within ~~36-12~~ hours.

Remaining within the Applicability of the LCO is acceptable to accomplish short duration repairs to restore inoperable equipment because the plant risk in MODE 4 is similar to or lower than MODE 5 (Ref. 3). In MODE 4 the Steam Generators and Residual Heat Removal System are available to remove decay heat, which provides diversity and defense in depth. As stated in Reference 3, the steam turbine driven Auxiliary Feedwater Pump must be available to remain in MODE 4. Should Steam Generator cooling be lost while relying on this Required Action, there are preplanned actions to ensure long-term decay heat removal. Voluntary entry into MODE 5 may be made as it is also acceptable from a risk perspective.

Required Action D.2 is modified by a Note that states that LCO 3.0.4.a is not applicable when entering MODE 4. This Note prohibits the use of LCO 3.0.4.a to enter MODE 4 during startup with the LCO not met. However, there is no restriction on the use of LCO 3.0.4.b, if applicable, because LCO 3.0.4.b requires performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering MODE 4, and establishment of risk management actions, if appropriate. LCO 3.0.4 is not applicable to, and the Note does not preclude, changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

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.

BASES

SURVEILLANCE REQUIREMENTS (continued)

Specifications tests at least once per refueling interval with applicable extensions. In some instances, the test includes actuation of the end device (e.g., pump starts, valve cycles, etc.). The Frequency is based on operating experience and is consistent with the typical industry refueling cycle. The SR is modified by a Note that excludes verification of setpoints during the TADOT. The Functions tested have no setpoints associated with them.

SR 3.3.8.5

A CHANNEL CALIBRATION is performed every [18] months, or approximately at every refueling. CHANNEL CALIBRATION is a complete check of the instrument loop, including the sensor. The test verifies that the channel responds to a measured parameter within the necessary range and accuracy. The Frequency is based on operating experience and is consistent with the typical industry refueling cycle.

REFERENCES

1. 10 CFR 100.11.
 2. Unit Specific Setpoint Calibration Procedure.
 3. WCAP-16294-NP-A, Rev. 1, "Risk-Informed Evaluation of Changes to Technical Specification Required Action Endstates for Westinghouse NSSS PWRs," June 2010.
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