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WISCONSIN PUBLIC SERVICE COMPANY - KEWAUNEE - RO INSPECTION REPORT NO. 50-305/74-10 - F30013H1

The transmittal memorandum for the subject report requests clarification of Technical Specification (TS) 3.5.d. TS 3.5.d allows the licensee to block a failed channel to prevent an unnecessary reactor trip while testing another channel for approximately 4 hours duration. This does not mean that operation with zero channel operability is allowed.

The action described in TS 3.5.d is consistent with Regulatory policy in the current standard TS. However, the language in the current standard TS is more explicit, as indicated in Enclosure 1, Action 6. TS 3.5.d is also consistent with IEEE Standard 279-1971 as discussed in Enclosure 2, Item 4.11, Exception.

We believe the enclosed information provides the requested clarification. If you require additional information or wish to discuss this matter further, please contact me.

Original Signed by
F. J. Nolan

F. J. Nolan
Facility Inspection Branch, RO

Enclosure:
1. Pg. 3/4 3-4, B&W Stnds.
2. Pg. 10, IEEE Stnd. 279-1971

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ENCLOSURE 1

TABLE 3.3-1 (Continued)

TABLE NOTATION

ACTION 4 - With the number of channels OPERABLE one less than required by the Minimum Channels OPERABLE requirement and with the THERMAL POWER level:

a. < (10^{-10}) amps on the Intermediate Range (IR) instrumentation, immediately go to HOT STANDBY and/or open the reactor trip breakers.

b. ≥ (10^{-10}) amps on the IR instrumentationn, operation may continue.

ACTION 5 - With the number of channels OPERABLE one less than required by the Minimum Channels OPERABLE requirement, immediately verify compliance with the SHUTDOWN MARGIN requirements of Specification 3.1.1.1 and at least once per 4 hours thereafter.

ACTION 6 - With the number of OPERABLE channels one less than the Total Number of Channels and with the THERMAL POWER level:

a. < 10% of RTP, immediately go to HOT STANDBY. (Note: This assumes 3 channels are the "minimum operable")

b. > 10% of RTP, operation may continue provided both of the following conditions are satisfied:

1. The inoperable channel is immediately placed in the tripped condition.

2. The Minimum Channels OPERABLE requirement is met; however, one additional channel may be bypassed for up to 20 hours for surveillance testing per Specification (4.3.1.1).

ACTION 7 - With one reactor trip module in either source supplying power to the control rod drive mechanisms (CRDM), failed in the untripped state:

a. Within 30 minutes remove power supplied to the CRDM through the failed trip device,

b. Within 8 hours

1. Test the remaining trip devices, and

2. Restore the failed trip device to OPERABILITY, or

c. Be in HOT SHUTDOWN within the next 4 hours.

B&W-STS essentially same as (W) but more specific and the latest revision

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rive the final system output signal from the various channel signals. For those parts of the system where the required interval between testing will be less than the normal time interval between generating station shutdowns, there shall be capability for testing during power operation.

4.11 Channel Bypass or Removal from Operation. The system shall be designed to permit any one channel to be maintained, and when required, tested or calibrated during power operation without initiating a protective action at the systems level. During such operation the active parts of the system shall of themselves continue to meet the single failure criterion.

Exception: "One-out-of-two" systems are permitted to violate the single failure criterion during channel bypass provided that acceptable reliability of operation can be otherwise demonstrated. For example, the bypass time interval required for a test, calibration, or maintenance operation could be shown to be so short that the probability of failure of the active channel would be commensurate with the probability of failure of the "one-out-of-two" system during its normal interval between tests.

4.12 Operating Bypasses. Where operating requirements necessitate automatic or manual bypass of a protective function, the design shall be such that the bypass will be removed automatically whenever permissive conditions are not met. Devices used to achieve automatic removal of the bypass of a protective function are part of the protection system and shall be designed in accordance with these criteria.

4.13 Indication of Bypasses. If the protective action of some part of the system has been bypassed or deliberately rendered inoperative for any purpose, this fact shall be continuously indicated in the control room.

4.14 Access to Means for Bypassing. The design shall permit the administrative control of the means for manually bypassing channels or protective functions.

4.15 Multiple Set Points. Where it is necessary to change to a more restrictive set point to provide adequate protection for a particular mode of operation or set of operating conditions, the design shall provide positive means of assuring that the more restrictive set point is used. The devices used to prevent improper use of less restrictive set points shall be considered a part of the protection system and shall be designed in accordance with the other provisions of these criteria regarding performance and reliability.

4.16 Completion of Protective Action Once It Is Initiated. The protection system shall be so designed that, once initiated, a protective action at the system level shall go to completion. Return to operation shall require subsequent deliberate operator action.

4.17 Manual Initiation. The protection system shall include means for manual initiation of each protective action at the system level (for example, reactor trip, containment isolation, safety injection, core spray, etc). No single failure, as defined by the note following Section 4.2, within the manual, automatic, or common portions of the protection system shall prevent initiation of protective action by manual or automatic means. Manual initiation should depend upon the operation of a minimum of equipment.

4.18 Access to Set Point Adjustments, Calibration, and Test Points. The design shall permit the administrative control of access to all set point adjustments, module calibration adjustments, and test points.

4.19 Identification of Protective Actions. Protective actions shall be indicated and identified down to the channel level.

4.20 Information Read-Out. The protection system shall be designed to provide the operator with accurate, complete, and timely information pertinent to its own status and to generating station safety. The design shall minimize the development of conditions which would cause meters, annunciators, recorders, alarms, etc, to give anomalous indications confusing to the operator.

4.21 System Repair. The system shall be designed to facilitate the recognition, location, replacement, repair, or adjustment of malfunctioning components or modules.

4.22 Identification. In order to provide assurance that the requirements given in this doc-