

TSTF

Technical Specifications Task Force  
A Joint Owners Group Activity

## DAEC Proposal to Consolidate Identical SRs after SFCP Adoption

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	SURVEILLANCE	FREQUENCY
	SR 3.3.5.1.1 Perform CHANNEL CHECK.	24 hours
	SR 3.3.5.1.2 Perform CHANNEL FUNCTIONAL TEST.	31 days
	<del>SR 3.3.5.1.3 Perform CHANNEL FUNCTIONAL TEST.</del>	<del>92 days</del>
	SR 3.3.5.1.4 Perform CHANNEL CALIBRATION.	92 days
	<del>SR 3.3.5.1.5 Perform CHANNEL FUNCTIONAL TEST.</del>	<del>12 months</del>
	<del>SR 3.3.5.1.6 Perform CHANNEL CALIBRATION.</del>	<del>12 months</del>
	<del>SR 3.3.5.1.7 Perform CHANNEL CALIBRATION.</del>	<del>10 months</del>
	<del>SR 3.3.5.1.8 Perform CHANNEL CALIBRATION.</del>	<del>24 months</del>
	SR 3.3.5.1.9 Perform LOGIC SYSTEM FUNCTIONAL TEST.	24 months

In accordance with the Surveillance Frequency Control Program

In accordance with the Surveillance Frequency Control Program

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ECCS Instrumentation  
3.3.5.1

Table 3.3.5.1-1 (page 1 of 5)  
Emergency Core Cooling System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
<b>1. Core Spray System</b>					
a. Reactor Vessel Water Level - Low/Low/Low	1.2.3, 4 <sup>(1)</sup> , 5 <sup>(1)</sup>	4 <sup>(1)</sup>	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4	≥ 38.3 inches
b. Drywell Pressure - High	1.2.3	4 <sup>(1)</sup>	B	SR 3.3.5.1.5 SR 3.3.5.1.6 SR 3.3.5.1.7	≥ 2.19 psig
c. Reactor Steam Dome Pressure - Low (Injection Permissive)	1.2.3, 4 <sup>(1)</sup> , 5 <sup>(1)</sup>	4	C	SR 3.3.5.1.8 SR 3.3.5.1.9 SR 3.3.5.1.10	≥ 363.3 psig and ≤ 485.1 psig
d. Core Spray Pump Discharge Flow - Low (Bypass)	1.2.3, 4 <sup>(1)</sup> , 5 <sup>(1)</sup>	1 per pump	E	SR 3.3.5.1.11 SR 3.3.5.1.12 SR 3.3.5.1.13	≥ 256.6 gpm and ≤ 2362.1 gpm
e. Core Spray Pump Start Time Delay Relay	1.2.3, 4 <sup>(1)</sup> , 5 <sup>(1)</sup>	1 per pump	C	SR 3.3.5.1.14 SR 3.3.5.1.15	≥ 2.6 seconds and ≤ 6.8 seconds
f. 416 kV Emergency Bus Sequential Locking Relay	1.2.3, 4 <sup>(1)</sup> , 5 <sup>(1)</sup>	1 per pump	F	SR 3.3.5.1.16 SR 3.3.5.1.17 SR 3.3.5.1.18	≥ 3600 V
<b>2. Low Pressure Coolant Injection (LPCI) System</b>					
a. Reactor Vessel Water Level - Low/Low/Low	1.2.3, 4 <sup>(1)</sup> , 5 <sup>(1)</sup>	4	B	SR 3.3.5.1.19 SR 3.3.5.1.20 SR 3.3.5.1.21 SR 3.3.5.1.22	≥ 38.3 inches
b. Drywell Pressure - High	1.2.3	4	B	SR 3.3.5.1.23 SR 3.3.5.1.24 SR 3.3.5.1.25	≥ 2.19 psig (continued)

(a) When associated ECCS subsystems are required to be OPERABLE per LCO 3.5.2, ECCS Shutdown.  
(b) Also required to initiate the associated Diesel Generator (DG).

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ECCS Instrumentation  
3.3.5.1

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3.3.5.1

SURVEILLANCE	FREQUENCY
SR 3.3.5.1.1 Perform CHANNEL CHECK	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.1.2 Perform CHANNEL FUNCTIONAL TEST	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.1.3 Perform CHANNEL CALIBRATION	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.1.4 Perform LOGIC SYSTEM FUNCTIONAL TEST	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE	FREQUENCY
SR 3.3.5.1.1 Perform CHANNEL CHECK	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.1.2 Perform CHANNEL FUNCTIONAL TEST	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.1.3 Perform CHANNEL FUNCTIONAL TEST	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.1.4 Perform CHANNEL CALIBRATION	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.1.5 Perform CHANNEL FUNCTIONAL TEST	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.1.6 Perform CHANNEL CALIBRATION	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.1.7 Perform CHANNEL CALIBRATION	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.1.8 Perform CHANNEL CALIBRATION	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.1.9 Perform LOGIC SYSTEM FUNCTIONAL TEST	In accordance with the Surveillance Frequency Control Program



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ECCS Instrumentation  
 B 3.3.5.1

BASES

SURVEILLANCE  
 REQUIREMENTS

SR 3.3.5.1.4, SR 3.3.5.1.6, SR 3.3.5.1.7, and SR 3.3.5.1.8

A CHANNEL CALIBRATION is a complete check of the instrument loop and the sensor. This test verifies the channel responds to the measured parameter within the necessary range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations consistent with the plant specific setpoint methodology.

The Frequency of SR 3.3.5.1.4 is based upon the assumption of a 92 day calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis.

The Frequency of SR 3.3.5.1.6 is based upon the assumption of a 12 month calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis.

The Frequency of SR 3.3.5.1.7 is based upon the assumption of an 18 month calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis.

The Frequency of SR 3.3.5.1.8 is based upon the assumption of a 24 month calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis.

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**Examples of Recent Issues  
 with TSTF-425 Adoption Submittals**

- Staff Challenged the DAEC Categorization as an Administrative Change from TSTF-425
- Staff Viewed the Proposal not as a "Consolidation" but "Removal" of SRs (a Technical Change)
- Staff Cited §50.36(c)(3) as the Basis for Their Concern with the "Removal"
- DAEC Agree to Withdraw the Consolidation to Allow Continued Review of the LAR.

**COVER SHEET FOR CORRESPONDENCE**  
**USE THIS COVER SHEET TO PROTECT ORIGINALS OF**  
**MULTI-PAGE CORRESPONDENCE**