



Carolinas

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803-701-4251

January 28, 2013

10 CFR 50.90

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555

Subject: Duke Energy Carolinas, LLC (Duke Energy)  
Catawba Nuclear Station, Units 1 and 2  
Docket Numbers 50-413 and 50-414  
Proposed Technical Specifications (TS) and Bases Amendment  
TS and Bases 3.7.8, Nuclear Service Water System (NSWS)  
Response to NRC Request for Additional Information (RAI)  
(TAC Nos. ME7659 and ME7660)

Reference: Letters from Duke Energy to the NRC, same subject, dated November 22, 2011, July 9, 2012, and November 12, 2012.

The reference letters constitute Duke Energy's request for amendments to the Catawba Facility Operating Licenses and TS to modify the subject TS and Bases to allow single discharge header operation of the NSWS (Duke Energy designation "RN") for a time period of 14 days. The requested change will facilitate future maintenance of the Unit 2 NSWS discharge headers in the Auxiliary Building.

On December 13, 2012, a telephone conference call was held between Duke Energy and the NRC staff. The purpose of this call was to discuss the proposed TS revisions submitted via the November 12, 2012 reference letter. Specifically, the NRC staff expressed a concern that when proposed Condition C ("One NSWS train inoperable due to NSWS being aligned for single Auxiliary Building discharge header operation") is entered, the rules of TS usage would also require Condition A ("One NSWS train inoperable") to be entered as well. This is contrary to the underlying purpose of the proposed amendments. In response to this concern, Duke Energy is proposing to add the following Note to Condition A (a corresponding Note discussion will also be added to the TS Bases for Condition A):

-----**NOTE**-----

Not applicable while in Condition C of this LCO unless entry is directed by Note 2 of Condition C.

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NRR

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Refer to the attached revised proposed TS and TS Bases pages for the described change. For completeness to aid in NRC processing of the amendment request, the entire revised proposed TS and TS Bases sections are included in the attachment.

The original regulatory evaluation contained in the November 22, 2011 reference letter is unaffected as a result of this RAI response supplement.

There are no regulatory commitments contained in this letter or its attachment.

Pursuant to 10 CFR 50.91, a copy of this RAI response supplement is being sent to the appropriate State of South Carolina official.

Inquiries on this matter should be directed to L.J. Rudy at (803) 701-3084.

Very truly yours,



Kelvin Henderson

LJR/s

Attachment

U.S. Nuclear Regulatory Commission

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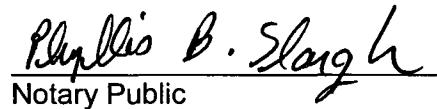
January 28, 2013

Kelvin Henderson affirms that he is the person who subscribed his name to the foregoing statement, and that all the matters and facts set forth herein are true and correct to the best of his knowledge.



Kelvin Henderson, Site Vice President

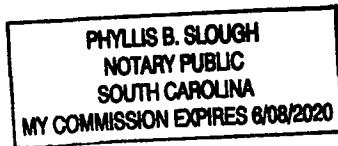
Subscribed and sworn to me: 1-28-2013  
Date



Phyllis B. Slough  
Notary Public

My commission expires: 6-8-2020  
Date

SEAL



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xc (with attachment):

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**ATTACHMENT**  
**REVISED PROPOSED TS AND TS BASES PAGES**

### 3.7 PLANT SYSTEMS

#### 3.7.8 Nuclear Service Water System (NSWS)

LCO 3.7.8      Two NSWS trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

#### ACTIONS

| CONDITION                                                                                                                                                          | REQUIRED ACTION                                                                                                                                                                                                                                                                                                                                                                           | COMPLETION TIME |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
| A. -----NOTE-----<br>Not applicable while in Condition C of this LCO unless entry is directed by Note 2 of Condition C.<br>-----<br><br>One NSWS train inoperable. | A.1 -----NOTES-----<br>1. Enter applicable Conditions and Required Actions of LCO 3.8.1, "AC Sources—Operating," for emergency diesel generator made inoperable by NSWS.<br><br>2. Enter applicable Conditions and Required Actions of LCO 3.4.6, "RCS Loops—MODE 4," for residual heat removal loops made inoperable by NSWS.<br><br>-----<br><br>Restore NSWS train to OPERABLE status. | 72 hours        |

(continued)

ACTIONS (continued)

| CONDITION                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | REQUIRED ACTION                                           | COMPLETION TIME |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------|-----------------|
| <p>B. -----NOTES-----</p> <p>1. Entry into this Condition shall only be allowed for pre-planned activities as described in the Bases of this Specification.</p> <p>2. Immediately enter Condition A of this LCO if one or more NSWS components become inoperable while in this Condition and one NSWS train remains OPERABLE.</p> <p>3. Immediately enter LCO 3.0.3 if one or more NSWS components become inoperable while in this Condition and no NSWS train remains OPERABLE.</p> <hr/> <p>One NSWS supply header inoperable due to NSWS being aligned for single supply header operation.</p> | <p>B.1 Restore NSWS supply header to OPERABLE status.</p> | <p>30 days</p>  |

(continued)

ACTIONS (continued)

| CONDITION                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | REQUIRED ACTION                            | COMPLETION TIME |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|-----------------|
| C. -----NOTES-----<br>1. Entry into this Condition shall only be allowed for Unit 1 and for pre-planned activities as described in the Bases of this Specification. Entry into this Condition shall not be allowed while Unit 2 is in MODE 1, 2, 3, or 4.<br><br>2. Immediately enter Condition A of this LCO if one or more Unit 1 required NSWS components become inoperable while in this Condition and one NSWS train remains OPERABLE.<br><br>3. Immediately enter LCO 3.0.3 if one or more Unit 1 required NSWS components become inoperable while in this Condition and no NSWS train remains OPERABLE.<br><br>-----<br><br>One NSWS train inoperable due to NSWS being aligned for single Auxiliary Building discharge header operation. | C.1 Restore NSWS train to OPERABLE status. | 14 days         |

(continued)

ACTIONS (continued)

| CONDITION                                                                          | REQUIRED ACTION                                              | COMPLETION TIME         |
|------------------------------------------------------------------------------------|--------------------------------------------------------------|-------------------------|
| D. Required Action and associated Completion Time of Condition A, B, or C not met. | D.1 Be in MODE 3.<br><br><u>AND</u><br><br>D.2 Be in MODE 5. | 6 hours<br><br>36 hours |

SURVEILLANCE REQUIREMENTS

| SURVEILLANCE                                                                                                                                                                                                                                                                                                                                                                     | FREQUENCY                                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------|
| SR 3.7.8.1 -----<br>NOTE-----<br>Isolation of NSWS flow to individual components does not render the NSWS inoperable.<br><br>-----<br><br>Verify each NSWS manual, power operated, and automatic valve in the flow path servicing safety related equipment, that is not locked, sealed, or otherwise secured in position, is in the correct position.                            | In accordance with the Surveillance Frequency Control Program |
| SR 3.7.8.2 -----<br>NOTE-----<br>Not required to be met for valves that are maintained in position to support NSWS single supply or discharge header operation.<br><br>-----<br><br>Verify each NSWS automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal. | In accordance with the Surveillance Frequency Control Program |
| SR 3.7.8.3 Verify each NSWS pump starts automatically on an actual or simulated actuation signal.                                                                                                                                                                                                                                                                                | In accordance with the Surveillance Frequency Control Program |

## B 3.7 PLANT SYSTEMS

### B 3.7.8 Nuclear Service Water System (NSWS)

#### BASES

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|------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| BACKGROUND | <p>The NSWS, including Lake Wylie and the Standby Nuclear Service Water Pond (SNSWP), provides a heat sink for the removal of process and operating heat from safety related components during a Design Basis Accident (DBA) or transient. During normal operation, and a normal shutdown, the NSWS also provides this function for various safety related and nonsafety related components. The safety related function is covered by this LCO.</p> <p>The NSWS consists of two independent loops (A and B) of essential equipment, each of which is shared between units. Each loop contains two NSWS pumps, each of which is supplied from a separate emergency diesel generator. Each set of two pumps supplies two trains (1A and 2A, or 1B and 2B) of essential equipment through common discharge piping. While the pumps are unit designated, i.e., 1A, 1B, 2A, 2B, all pumps receive automatic start signals from a safety injection or blackout signal from either unit. Therefore, a pump designated to one unit will supply post accident cooling to equipment in that loop on both units, provided its associated emergency diesel generator is available. For example, the 1A NSWS pump, supplied by emergency diesel 1A, will supply post accident cooling to NSWS trains 1A and 2A.</p> <p>One NSWS loop containing two OPERABLE NSWS pumps has sufficient capacity to supply post loss of coolant accident (LOCA) loads on one unit and shutdown and cooldown loads on the other unit. Thus, the OPERABILITY of two NSWS loops assures that no single failure will keep the system from performing the required safety function. Additionally, one NSWS loop containing one OPERABLE NSWS pump has sufficient capacity to maintain one unit indefinitely in MODE 5 (commencing 36 hours following a trip from RTP) while supplying the post LOCA loads of the other unit. Thus, after a unit has been placed in MODE 5, only one NSWS pump and its associated emergency diesel generator are required to be OPERABLE on each loop, in order for the system to be capable of performing its required safety function, including single failure considerations.</p> <p>Additional information about the design and operation of the NSWS, along with a list of the components served, is presented in the UFSAR, Section 9.2.1 (Ref. 1). The principal safety related function of the NSWS is the removal of decay heat from the reactor via the CCW System.</p> |
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**BASES**

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**APPLICABLE SAFETY ANALYSES** The design basis of the NSWS is for one NSWS train, in conjunction with the CCW System and a containment spray system, to remove core decay heat following a design basis LOCA as discussed in the UFSAR, Section 6.2 (Ref. 2). This prevents the containment sump fluid from increasing in temperature during the recirculation phase following a LOCA and provides for a gradual reduction in the temperature of this fluid as it is supplied to the Reactor Coolant System by the ECCS pumps. The NSWS is designed to perform its function with a single failure of any active component, assuming the loss of offsite power.

The NSWS, in conjunction with the CCW System, also cools the unit from residual heat removal (RHR), as discussed in the UFSAR, Section 5.4 (Ref. 3), from RHR entry conditions to MODE 5 during normal and post accident operations. The time required for this evolution is a function of the number of CCW and RHR System trains that are operating. Thirty six hours after a trip from RTP, one NSWS train is sufficient to remove decay heat during subsequent operations in MODES 5 and 6. This assumes a maximum NSWS temperature, a simultaneous design basis event on the other unit, and the loss of offsite power.

The NSWS satisfies Criterion 3 of 10 CFR 50.36 (Ref. 4).

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**LCO**

Two NSWS trains are required to be OPERABLE to provide the required redundancy to ensure that the system functions to remove post accident heat loads, assuming that the worst case single active failure occurs coincident with the loss of offsite power.

While the NSWS is operating in the normal dual supply and discharge header alignment, an NSWS train is considered OPERABLE during MODES 1, 2, 3, and 4 when:

- a. 1. Both NSWS pumps on the NSWS loop are OPERABLE; or
  2. One unit's NSWS pump is OPERABLE and one unit's flowpath to the non essential header, AFW pumps, and Containment Spray heat exchangers are isolated (or equivalent flow restrictions); and
- b. The associated piping, valves, and instrumentation and controls required to perform the safety related function are OPERABLE.

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BASES

## LCO (continued)

The NSWS system is shared between the two units. The shared portions of the system must be OPERABLE for each unit when that unit is in the MODE of Applicability. Additionally, both normal and emergency power for shared components must also be OPERABLE. If a shared NSWS component becomes inoperable, or normal or emergency power to shared components becomes inoperable, then the Required Actions of this LCO must be entered independently for each unit that is in the MODE of applicability of the LCO, except as noted in a.2 above for operation in the normal dual supply header alignment. In this case, sufficient flow is available, however, this configuration results in inoperabilities within other required systems on one unit and the associated Required Actions must be entered. Use of a NSWS pump and associated diesel generator on a shutdown unit to support continued operation (> 72 hours) of a unit with an inoperable NSWS pump is prohibited. A shutdown unit supplying its associated emergency power source (1EMXG/2EMXH) cannot be credited for OPERABILITY of components supporting the operating unit.

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|---------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| APPLICABILITY | In MODES 1, 2, 3, and 4, the NSWS is a normally operating system that is required to support the OPERABILITY of the equipment serviced by the NSWS and required to be OPERABLE in these MODES.<br><br>In MODES 5 and 6, the requirements of the NSWS are determined by the systems it supports. |
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|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ACTIONS | <u>A.1</u><br><br>Condition A is modified by a Note indicating that this Condition is not applicable while in Condition C of this LCO unless entry is directed by Note 2 of Condition C.<br><br>If one NSWS train is inoperable, action must be taken to restore OPERABLE status within 72 hours. In this Condition, the remaining OPERABLE NSWS train is adequate to perform the heat removal function. However, the overall reliability is reduced because a single failure in the OPERABLE NSWS train could result in loss of NSWS function. Due to the shared nature of the NSWS, both units are required to enter a 72 hour Action when a NSWS Train becomes inoperable on either unit. Required Action A.1 is modified by two Notes. The first Note indicates that the applicable Conditions and Required Actions of LCO 3.8.1, "AC Sources—Operating," should be entered if an inoperable |
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BASES

ACTIONS (continued)

NSWS train results in an inoperable emergency diesel generator. The second Note indicates that the applicable Conditions and Required Actions of LCO 3.4.6, "RCS Loops—MODE 4," should be entered if an inoperable NSWS train results in an inoperable decay heat removal train (RHR). An example of when these Notes should be applied is with both units' loop 'A' NSWS pumps inoperable, both units' 'A' emergency diesel generators and both units' 'A' RHR systems should be declared inoperable and appropriate Actions entered. This is an exception to LCO 3.0.6 and ensures the proper actions are taken for these components. The 72 hour Completion Time is based on the redundant capabilities afforded by the OPERABLE train, and the low probability of a DBA occurring during this time period.

B.1

While the NSWS is operating in the single supply header alignment, one of the supply headers is removed from service in support of planned maintenance or modification activities associated with the supply header that is taken out of service. In this configuration, each NSWS train is considered OPERABLE with the required NSWS flow to safety related equipment being fed through the remaining OPERABLE NSWS supply header. While the NSWS is operating in the single supply header alignment, an NSWS train is considered OPERABLE during MODES 1, 2, 3, and 4 when:

- a. The associated train related NSWS pumps are OPERABLE; and
- b. The associated piping (except for the supply header that is taken out of service), valves, and instrumentation and controls required to perform the safety related function are OPERABLE.

If one NSWS supply header is inoperable due to the NSWS being aligned for single supply header operation, the NSWS supply header must be restored to OPERABLE status within 30 days. Dual supply header operation is the normal alignment of the NSWS. The Completion Time of 30 days is supported by probabilistic risk analysis. While in Condition B, the single supply header is adequate to perform the heat removal function for all required safety related equipment for both safety trains. Due to the shared nature of the NSWS, both units are required to enter this Condition when the NSWS is aligned for single supply header operation. In order to prevent the potential for NSWS pump runout, the single NSWS pump flow balance alignment is prohibited while the NSWS is aligned for single supply header operation.

**BASES****ACTIONS (continued)**

Condition B is modified by three Notes. Note 1 states that entry into this Condition shall only be allowed for pre-planned activities as described in the Bases of this Specification. Condition B is only allowed to be entered in support of planned maintenance or modification activities associated with the supply header that is taken out of service. An example of a situation for which entry into this Condition is allowed is refurbishment or inspection of a supply header. Entry into this Condition is not allowed in response to unplanned events or for other events involving the NSWS. Examples of situations for which entry into this Condition is prohibited are emergent repair of discovered piping leaks and other component failures. For unplanned events or other events involving the NSWS, Condition A must be entered. Note 2 requires immediate entry into Condition A of this LCO if one or more NSWS components become inoperable while in this Condition and one NSWS train remains OPERABLE. With one remaining OPERABLE NSWS train, the NSWS can still perform its safety related function. However, with one inoperable NSWS train, the NSWS cannot be assured of performing its safety related function in the event of a single failure of another NSWS component. The most limiting single failure is the failure of an NSWS pit to automatically transfer from Lake Wylie to the SNSWP during a seismic event. While the loss of any NSWS component subject to the requirements of this LCO can result in the entry into Condition A, the most common example is the inoperability of an NSWS pump. This occurs during periodic testing of the emergency diesel generators. Inoperability of an emergency diesel generator renders its associated NSWS pump inoperable. Note 3 requires immediate entry into LCO 3.0.3 if one or more NSWS components become inoperable while in this Condition and no NSWS train remains OPERABLE. In this case, the NSWS cannot perform its safety related function.

**C.1**

While the NSWS is operating in the single Auxiliary Building discharge header alignment, one of the Unit 2 Auxiliary Building discharge headers is removed from service in support of planned maintenance or modification activities associated with the Auxiliary Building discharge header that is taken out of service. In this configuration, the corresponding (train related) Unit 1 NSWS train is inoperable and the required NSWS flow to safety related equipment is discharged through the remaining OPERABLE NSWS Auxiliary Building discharge header.

When in the single Auxiliary Building discharge header alignment with the NSWS Train A discharge header inoperable, the NSWS piping between

**BASES****ACTIONS (continued)**

valves 1RNP19 and 1RN63A is isolated. Likewise, when in the single Auxiliary Building discharge header alignment with the NSWS Train B discharge header inoperable, the NSWS piping between valves 1RNP20 and 1RN58B is isolated.

Operation of the NSWS in the single supply header alignment and the single Auxiliary Building discharge header alignment at the same time is prohibited.

If one NSWS train is inoperable due to the NSWS being aligned for single Auxiliary Building discharge header operation, the NSWS train must be restored to OPERABLE status within 14 days. Dual Auxiliary Building discharge header operation is the normal alignment of the NSWS. The Completion Time of 14 days is supported by probabilistic risk analysis. While in Condition C, the single Auxiliary Building discharge header is adequate to perform the heat removal function for all required safety related equipment for its respective safety train. Due to the design of the NSWS, only the operating unit is required to enter this Condition when the NSWS is aligned for single Auxiliary Building discharge header operation. Pre-planned activities requiring entry into this Condition are only performed with Unit 2 in an outage (MODE 5, 6, or defueled).

Condition C is modified by three Notes. Note 1 states that entry into this Condition shall only be allowed for Unit 1 and for pre-planned activities as described in the Bases of this Specification. Condition C is only allowed to be entered in support of planned maintenance or modification activities associated with the Auxiliary Building discharge header that is taken out of service. An example of a situation for which entry into this Condition is allowed is refurbishment or inspection of an Auxiliary Building discharge header. Entry into this Condition is not allowed in response to unplanned events or for other events involving the NSWS. Examples of situations for which entry into this Condition is prohibited are emergent repair of discovered piping leaks and other component failures. For unplanned events or other events involving the NSWS, Condition A must be entered. In addition, Note 1 states that entry into this Condition shall not be allowed while Unit 2 is in MODE 1, 2, 3, or 4. Entry into this Condition is only allowed while the LCO is not applicable to Unit 2. Note 2 requires immediate entry into Condition A of this LCO if one or more Unit 1 required NSWS components become inoperable while in this Condition and one NSWS train remains OPERABLE. With one remaining OPERABLE NSWS train, the NSWS can still perform its safety related function. However, with one inoperable NSWS train, the NSWS cannot be assured of performing its safety related function in the event of a

**BASES**

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**ACTIONS (continued)**

single failure of another NSWS component. While the loss of any NSWS component subject to the requirements of this LCO can result in the entry into Condition A, the most common example is the inoperability of an NSWS pump. This occurs during periodic testing of the emergency diesel generators. Inoperability of an emergency diesel generator renders its associated NSWS pump inoperable. Note 3 requires immediate entry into LCO 3.0.3 if one or more Unit 1 required NSWS components become inoperable while in this Condition and no NSWS train remains OPERABLE. In this case, the NSWS cannot perform its safety related function.

**D.1 and D.2**

If the NSWS train cannot be restored to OPERABLE status within the associated Completion Time, or if the NSWS supply header cannot be restored to OPERABLE status within the associated Completion Time, the unit must be placed in a MODE in which the LCO does not apply. To achieve this status, the unit must be placed in at least MODE 3 within 6 hours and in MODE 5 within 36 hours.

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.

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**SURVEILLANCE REQUIREMENTS**

**SR 3.7.8.1**

This SR is modified by a Note indicating that the isolation of the NSWS components or systems may render those components inoperable, but does not affect the OPERABILITY of the NSWS.

Verifying the correct alignment for manual, power operated, and automatic valves in the NSWS flow path provides assurance that the proper flow paths exist for NSWS operation. This SR does not apply to valves that are locked, sealed, or otherwise secured in position, since they are verified to be in the correct position prior to being locked, sealed, or secured. This SR does not require any testing or valve manipulation; rather, it involves verification that those valves capable of being mispositioned are in the correct position. This SR does not apply to valves that cannot be inadvertently misaligned, such as check valves. The Surveillance Frequency is based on operating experience, equipment reliability, and plant risk and is controlled under the Surveillance Frequency Control Program.

**BASES**

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**SURVEILLANCE REQUIREMENTS (continued)**

**SR 3.7.8.2**

This SR verifies proper automatic operation of the NSWS valves on an actual or simulated actuation signal. The signals that cause the actuation are from Safety Injection and Phase 'B' isolation. The NSWS is a normally operating system that cannot be fully actuated as part of normal testing. This Surveillance is not required for valves that are locked, sealed, or otherwise secured in the required position under administrative controls. The Surveillance Frequency is based on operating experience, equipment reliability, and plant risk and is controlled under the Surveillance Frequency Control Program.

This SR is modified by a Note that states that the SR is not required to be met for valves that are maintained in position to support NSWS single supply or discharge header operation. When the NSWS is placed in this alignment, certain automatic valves in the system are maintained in position and will not automatically reposition in response to an actuation signal while the NSWS is in this alignment.

**SR 3.7.8.3**

This SR verifies proper automatic operation of the NSWS pumps on an actual or simulated actuation signal. The signals that cause the actuation are from Safety Injection and Loss of Offsite Power. The NSWS is a normally operating system that cannot be fully actuated as part of normal testing during normal operation. The Surveillance Frequency is based on operating experience, equipment reliability, and plant risk and is controlled under the Surveillance Frequency Control Program.

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**REFERENCES**

1. UFSAR, Section 9.2.
2. UFSAR, Section 6.2.
3. UFSAR, Section 5.4.
4. 10 CFR 50.36, Technical Specifications, (c)(2)(ii).