

ATTACHMENT A

**EXISTING TECHNICAL SPECIFICATIONS
AND BASES**

UNIT 2

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REACTIVITY CONTROL SYSTEMS

CHARGING PUMP - SHUTDOWN

LIMITING CONDITION FOR OPERATION

3.1.2.3 At least one charging pump or one high pressure safety injection pump in the boron injection flow path required OPERABLE pursuant to Specification 3.1.2.1 shall be OPERABLE and capable of being powered from an OPERABLE emergency power source.

APPLICABILITY: MODES 5 and 6.

ACTION:

With no charging pump or high pressure safety injection pump OPERABLE or capable of being powered from an OPERABLE emergency power source, suspend all operations involving CORE ALTERATIONS or positive reactivity changes.

SURVEILLANCE REQUIREMENTS

4.1.2.3 No additional Surveillance Requirements other than those required by Specification 4.0.5.

ISSUED TO A
CONTROLLED LOCATION

REACTOR COOLANT SYSTEM

OVERPRESSURE PROTECTION SYSTEMS

RCS TEMPERATURE \leq 312°F

LIMITING CONDITION FOR OPERATION

3.4.8.3.1 At least one of the following overpressure protection systems shall be OPERABLE:

- a. The Shutdown Cooling System Relief Valve (PSV9349) with:
 - 1) A lift setting of 406 ± 10 psig*, and
 - 2) Relief Valve isolation valves 2HV9337, 2HV9339, 2HV9377 and 2HV9378 open, or,
- b. The Reactor Coolant System depressurized with an RCS vent of greater than or equal to 5.6 square inches.

APPLICABILITY: MODE 4 when the temperature of any one RCS cold leg is less than or equal to that specified in Table 3.4-3; MODE 5; MODE 6 with the reactor vessel head on.

ACTION:

- a. With the SDCS Relief Valve inoperable, reduce T_{avg} to less than 200°F, depressurize and vent the RCS through a greater than or equal to 5.6 square inch vent within the next 8 hours.
- b. With one or both SDCS Relief Valve isolation valves in a single SDCS Relief Valve isolation valve pair (valve pair 2HV9337 and 2HV9339 or valve pair 2HV9377 and 2HV9378) closed, open the closed valve(s) within 7 days or reduce T_{avg} to less than 200°F, depressurize and vent the RCS through a greater than or equal to 5.6 inch vent within the next 8 hours.
- c. In the event either the SDCS Relief Valve or an RCS vent is used to mitigate an RCS pressure transient, a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 30 days. The report shall describe the circumstances initiating the transient, the effect of the SDCS Relief Valve or RCS vent on the transient and any corrective action necessary to prevent recurrence.
- d. The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.4.8.3.1.1 The SDCS Relief Valve shall be demonstrated OPERABLE by:

- a. Verifying at least once per 72 hours when the SDCS Relief Valve is being used for overpressure protection that SDCS Relief Valve isolation valves 2HV9337, 2HV9339, 2HV9377 and 2HV9378 are open.

*For valve temperatures less than or equal to 130°F.

REACTOR COOLANT SYSTEM

SURVEILLANCE REQUIREMENTS (Continued)

- b. Verifying relief valve setpoint at least once per 30 months when tested pursuant to Specification 4.0.5.

4.4.8.3.1.2 The RCS vent shall be verified to be open at least once per 12 hours* when the vent is being used for overpressure protection.

ISSUED TO A
CONTROLLED LOCATION

*Except when the vent pathway is provided with a valve which is locked, sealed, or otherwise secured in the open position, then verify these valves open at least once per 31 days.

EMERGENCY CORE COOLING SYSTEMS

3/4.5.3 ECCS SUBSYSTEMS - T_{avg} LESS THAN 350°F

LIMITING CONDITION FOR OPERATION

3.5.3 As a minimum, one ECCS subsystem comprised of the following shall be OPERABLE:

- a. One OPERABLE high-pressure safety injection pump, and
- b. An OPERABLE flow path capable of taking suction from the refueling water tank on a Safety Injection Actuation Signal and automatically transferring suction to the containment sump on a Recirculation Actuation Signal.

APPLICABILITY: MODES 3* and 4.

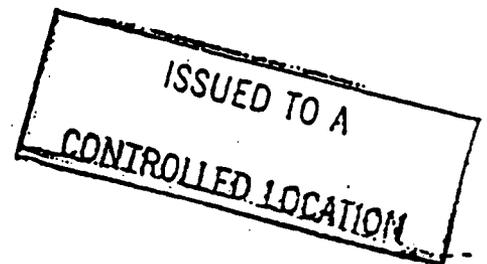
ACTION:

- a. With no ECCS subsystem OPERABLE, restore at least one ECCS subsystem to OPERABLE status within 1 hour or be in COLD SHUTDOWN within the next 20 hours.
- b. In the event the ECCS is actuated and injects water into the Reactor Coolant System, a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 90 days describing the circumstances of the actuation and the total accumulated actuation cycles to date. The current value of the usage factor for each affected safety injection nozzle shall be provided in this Special Report whenever its value exceeds 0.70.

SURVEILLANCE REQUIREMENTS

4.5.3 The ECCS subsystem shall be demonstrated OPERABLE per the applicable Surveillance Requirements of 4.5.2.

* With pressurizer pressure less than 400 psia.



REACTOR COOLANT SYSTEM

BASES

PRESSURE/TEMPERATURE LIMITS (Continued)

The OPERABILITY of the Shutdown Cooling System relief valve or a RCS vent opening of greater than 5.6 square inches ensures that the RCS will be protected from pressure transients which could exceed the limits of Appendix G to 10 CFR Part 50 when one or more of the RCS cold legs are less than or equal to that specified in Table 3.4-3. The Shutdown Cooling System relief valve has adequate relieving capability to protect the RCS from overpressurization when the transient is limited to either (1) the start of an idle RCP with the secondary water temperature of the steam generator less than or equal to 100°F above the RCS cold leg temperatures or (2) inadvertent safety injection actuation with two HPSI pumps injecting into a water-solid RCS with full charging capacity and letdown isolated.

3/4.4.9 STRUCTURAL INTEGRITY

The inservice inspection and testing programs for ASME Code Class 1, 2 and 3 components ensure that the structural integrity and operational readiness of these components will be maintained at an acceptable level throughout the life of the plant. These programs are in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR Part 50.55a(g) except where specific written relief has been granted by the Commission pursuant to 10 CFR Part 50.55a (g) (6) (i).

Components of the reactor coolant system were designed to provide access to permit inservice inspections in accordance with Section XI of the ASME Boiler and Pressure Vessel Code, 1974 Edition and Addenda through Summer 1975.

3/4.4.10 REACTOR COOLANT GAS VENT SYSTEM

Reactor coolant system gas vents are provided to exhaust noncondensable gases from the primary system that could inhibit natural circulation core cooling following a non-design bases accident. The OPERABILITY of at least one reactor coolant system vent path from the reactor vessel head and the pressurizer steam space ensures the capability exists to perform this function.

The design redundancy of the Reactor Coolant Gas Vent System serves to minimize the probability of inadvertent or irreversible actuation while ensuring that a single failure of a vent valve, or control system does not prevent isolation of the vent path.

The function, capabilities, and testing requirements of the Reactor Coolant Gas Vent System are consistent with the requirements of Item II.b.1 of NUREG-0737, "Clarification of TMI Action Plan Requirements," November 1980.

EMERGENCY CORE COOLING SYSTEMS

BASES

ECCS SUBSYSTEMS (Continued)

With the RCS temperature below 350°F, one OPERABLE ECCS subsystem is acceptable without single failure consideration on the basis of the stable reactivity condition of the reactor and the limited core cooling requirements.

The Surveillance Requirements provided to ensure OPERABILITY of each component ensure that at a minimum, the assumptions used in the accident analyses are met and that subsystem OPERABILITY is maintained. Surveillance requirements for flow balance testing provide assurance that proper ECCS flows will be maintained in the event of a LOCA. Maintenance of proper flow resistance and pressure drop in the piping system to each injection point is necessary to: (1) prevent total pump flow from exceeding runout conditions when the system is in its minimum resistance configuration, (2) provide the proper flow split between injection points in accordance with the assumptions used in the ECCS-LOCA analyses, and (3) provide an acceptable level of total ECCS flow to all injection points equal to or above that assumed in the ECCS-LOCA analyses.

3/4.5.4 REFUELING WATER STORAGE TANK (RWST)

The OPERABILITY of the RWST as part of the ECCS ensures that a sufficient supply of borated water is available for injection by the ECCS in the event of a LOCA. The limits on RWST minimum volume and boron concentration ensure that 1) sufficient water is available within containment to permit recirculation cooling flow to the core, and 2) the reactor will remain subcritical in the cold condition following mixing of the RWST and the RCS water volumes with all control rods inserted except for the most reactive control assembly. The limit on maximum boron concentration is to ensure that boron does not precipitate in the core following LOCA. The limit on RWST solution temperature is to ensure that the assumptions used in the LOCA analyses remain valid.

ATTACHMENT B

**EXISTING TECHNICAL SPECIFICATIONS
AND BASES**

UNIT 3

REACTIVITY CONTROL SYSTEMS

CHARGING PUMP - SHUTDOWN

LIMITING CONDITION FOR OPERATION

3.1.2.3 At least one charging pump or one high pressure safety injection pump in the boron injection flow path required OPERABLE pursuant to Specification 3.1.2.1 shall be OPERABLE and capable of being powered from an OPERABLE emergency power source.

APPLICABILITY: MODES 5 and 6.

ACTION:

With no charging pump or high pressure safety injection pump OPERABLE or capable of being powered from an OPERABLE emergency power source, suspend all operations involving CORE ALTERATIONS or positive reactivity changes.

SURVEILLANCE REQUIREMENTS

4.1.2.3 No additional Surveillance Requirements other than those required by Specification 4.0.5.

ISSUED TO A
CONTROLLED LOCATION

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REACTOR COOLANT SYSTEM

OVERPRESSURE PROTECTION SYSTEMS

RCS TEMPERATURE \leq 302°F

LIMITING CONDITION FOR OPERATION

3.4.8.3.1 At least one of the following overpressure protection systems shall be OPERABLE:

- a. The Shutdown Cooling System Relief Valve (PSV9349) with:
 - 1) A lift setting of 406 ± 10 psig*, and
 - 2) Relief valve isolation valves 3HV9337, 3HV9339, 3HV9377, and 3HV9378 open, or,
- b. The Reactor Coolant System depressurized with an RCS vent of greater than or equal to 5.6 square inches.

APPLICABILITY: MODE 4 when the temperature of any one RCS cold leg is less than or equal to that specified in Table 3.4-3; MODE 5; MODE 6 with the reactor vessel head on.

ACTION:

- a. With the SDCS Relief Valve inoperable, reduce T_{avg} to less than 200°F, depressurize and vent the RCS through a greater than or equal to 5.6 square inch vent within the next 8 hours.
- b. With one or both SDCS Relief Valve isolation valves in a single SDCS Relief Valve isolation valve pair (valve pair 3HV9337 and 3HV9339 or valve pair 3HV9377 and 3HV9378) closed, open the closed valve(s) within 7 days or reduce T_{avg} to less than 200°F, depressurize and vent the RCS through a greater than or equal to 5.6 inch vent within the next 8 hours.
- c. In the event either the SDCS Relief Valve or an RCS vent is used to mitigate an RCS pressure transient, a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 30 days. The report shall describe the circumstances initiating the transient, the effect of the SDCS Relief Valve or RCS vent on the transient and any corrective action necessary to prevent recurrence.
- d. The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

- 4.4.8.3.1.1 The SDCS Relief Valve shall be demonstrated OPERABLE by:
- a. Verifying at least once per 72 hours when the SDCS Relief Valve is being used for overpressure protection that SDCS Relief Valve isolation valves 3HV9337, 3HV9339, 3HV9377, and 3HV9378 are open.

*The lift setting pressure applicable to valve temperatures of less than or equal to 130°F.

REACTOR COOLANT SYSTEM

SURVEILLANCE REQUIREMENTS (Continued)

- b. Verifying relief valve setpoint at least once per 30 months when tested pursuant to Specification 4.0.5.

4.4.8.3.1.2 The RCS vent shall be verified to be open at least once per 12 hours* when the vent is being used for overpressure protection.

*Except when the vent pathway is provided with a valve which is locked, sealed, or otherwise secured in the open position, then verify the valves open at least once per 31 days.

ISSUED TO A

CONTROLLED LOCATION

EMERGENCY CORE COOLING SYSTEMS

3/4.5.3 ECCS SUBSYSTEMS - T_{avg} LESS THAN 350°F

LIMITING CONDITION FOR OPERATION

3.5.3 As a minimum, one ECCS subsystem comprised of the following shall be OPERABLE:

- a. One OPERABLE high-pressure safety injection pump, and
- b. An OPERABLE flow path capable of taking suction from the refueling water tank on a Safety Injection Actuation Signal and automatically transferring suction to the containment sump on a Recirculation Actuation Signal.

APPLICABILITY: MODES 3* and 4.

ACTION:

- a. With no ECCS subsystem OPERABLE, restore at least one ECCS subsystem to OPERABLE status within 1 hour or be in COLD SHUTDOWN within the next 20 hours.
- b. In the event the ECCS is actuated and injects water into the Reactor Coolant System, a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 90 days describing the circumstances of the actuation and the total accumulated actuation cycles to date. The current value of the usage factor for each affected safety injection nozzle shall be provided in this Special Report whenever its value exceeds 0.70.

SURVEILLANCE REQUIREMENTS

4.5.3 The ECCS subsystem shall be demonstrated OPERABLE per the applicable Surveillance Requirements of 4.5.2.

*With pressurizer pressure less than 400 psia.

ISSUED TO A
CONTROLLED LOCATION

REACTOR COOLANT SYSTEM

BASES

PRESSURE/TEMPERATURE LIMITS (Continued)

The OPERABILITY of the Shutdown Cooling System relief valve or an RCS vent opening of greater than 5.6 square inches ensures that the RCS will be protected from pressure transients which could exceed the limits of Appendix G to 10 CFR Part 50 when one or more of the RCS cold legs is less than or equal to that specified in Table 3.4-3. The Shutdown Cooling System relief valve has adequate relieving capability to protect the RCS from overpressurization when the transient is limited to either (1) the start of an idle RCP with the secondary water temperature of the steam generator less than or equal to 100°F above the RCS cold leg temperatures or (2) inadvertent safety injection actuation with two HPSI pumps injecting into a water-solid RCS with full charging capacity and letdown isolated.

3/4.4.9 STRUCTURAL INTEGRITY

The inservice inspection and testing programs for ASME Code Class 1, 2 and 3 components ensure that the structural integrity and operational readiness of these components will be maintained at an acceptable level throughout the life of the plant. These programs are in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR Part 50.55a(g) except where specific written relief has been granted by the Commission pursuant to 10 CFR Part 50.55a (g) (6) (i).

Components of the Reactor Coolant System were designed to provide access to permit inservice inspections in accordance with Section XI of the ASME Boiler and Pressure Vessel Code, 1974 Edition and Addenda through Summer 1975.

3/4.4.10 REACTOR COOLANT GAS VENT SYSTEM

Reactor coolant system gas vents are provided to exhaust noncondensable gases from the primary system that could inhibit natural circulation core cooling following a non-design bases accident. The OPERABILITY of at least one reactor coolant system vent path from the reactor vessel head and the pressurizer steam space ensures the capability exists to perform this function.

The design redundancy of the Reactor Coolant Gas Vent System serves to minimize the probability of inadvertent or irreversible actuation while ensuring that a single failure of a vent valve, or control system does not prevent isolation of the vent path.

The function, capabilities, and testing requirements of the Reactor Coolant Gas Vent System are consistent with the requirements of Item II.b.1 of NUREG-0737, "Clarification of TMI Action Plan Requirements," November 1980.

ATTACHMENT C

**PROPOSED TECHNICAL SPECIFICATIONS
AND BASES**

UNIT 2

REACTIVITY CONTROL SYSTEMS

CHARGING PUMP - SHUTDOWN

LIMITING CONDITION FOR OPERATION

3.1.2.3 At least one charging pump or one high pressure safety injection pump in the boron injection flow path required OPERABLE pursuant to Specification 3.1.2.1 shall be OPERABLE and capable of being powered from an OPERABLE emergency power source.

APPLICABILITY: MODES 5 AND 6.*

ACTION:

With no charging pump or high pressure safety injection pump OPERABLE or capable of being powered from an OPERABLE emergency power source, suspend all operations involving CORE ALTERATIONS or positive reactivity changes.

SURVEILLANCE REQUIREMENTS

4.1.2.3.1 No additional Surveillance Requirements other than those required by Specification 4.0.5.

* See Specification 3.4.8.3.1 for the limit on the number of High Pressure Safety Injection Pumps OPERABLE in Modes 5 and 6.

REACTOR COOLANT SYSTEM

OVERPRESSURE PROTECTION SYSTEMS

RCS TEMPERATURE \leq 312°F

LIMITING CONDITION FOR OPERATION

3.4.8.3.1 No more than two high-pressure safety injection pumps shall be OPERABLE and at least one of the following overpressure protection systems shall be OPERABLE:

- a. The Shutdown Cooling System Relief Valve (PSV9349) with:
 - 1) A lift setting of 406 ± 10 psig*, and
 - 2) Relief Valve isolation valves 2HV9337, 2HV9339, 2HV9377, and 2HV9378 open, ~~or,~~

or,
- b. The Reactor Coolant System depressurized with an RCS vent of greater than or equal to 5.6 square inches.

APPLICABILITY: MODE 4 when the temperature of any one RCS cold leg is less than or equal to ~~that~~ the enable temperatures specified in Table 3.4-3; MODE 5; and MODE 6 ~~with~~ when the reactor vessel head is on the reactor vessel and the RCS is not vented.

ACTION:

- a. With the SDCS Relief Valve inoperable, reduce T_{avg} to less than 200°F, depressurize and vent the RCS through a greater than or equal to 5.6 square inch vent within the next 8 hours.
- b. With one or both SDCS Relief Valve isolation valves in a single SDCS Relief Valve isolation valve pair (valve pair 2HV9337 and 2HV9339 or valve pair 2HV9377 and 2HV9378) closed, open the closed valve(s) or power-lock open the OPERABLE SDCS Relief Valve isolation valve pair within ~~7 days~~ 24 hours, or reduce T_{avg} to less than 200°F, depressurize and vent the RCS through a greater than or equal to 5.6 inch vent within the next 8 hours.
- c. With more than two high-pressure safety injection pumps OPERABLE, secure the third high-pressure safety injection pump by racking out its motor circuit breaker or locking close its discharge valve within 8 hours.

* For valve temperatures less than or equal to 130°F.

REACTOR COOLANT SYSTEM

LIMITING CONDITION FOR OPERATION

ACTION: (Continued)

- d. In the event either the SDCS Relief Valve or an RCS vent is used to mitigate an RCS pressure transient, a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 30 days. The report shall describe the circumstances initiating the transient, the effect of the SDCS Relief Valve or RCS vent on the transient and any corrective action necessary to prevent recurrence.
- e. The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.4.8.3.1.1 The SDCS Relief Valve shall be demonstrated OPERABLE by:

- a. Verifying at least once per 72 hours when the SDCS Relief Valve is being used for overpressure protection that SDCS Relief Valve isolation valves 2HV9337, 2HV9339, 2HV9377 and 2HV9378 are open.
- b. Verifying relief valve setpoint at least once per 30 months when tested pursuant to Specification 4.0.5.

4.4.8.3.1.2 At least once per 12 hours, the third high-pressure safety injection pump shall be demonstrated to be secured by verifying that its motor circuit breaker is not racked-in or its discharge valve is locked closed. The requirement to rack out the third HPSI pump breaker is satisfied with the pump breaker racked out to its disconnected or test position.

4.4.8.3.1.3 At least once per 12 hours, the OPERABLE SDCS Relief Valve isolation valve pair (valve pair 2HV9337 and 2HV9339, or valve pair 2HV9377 and 2HV9378) that is used for overpressure protection due to the other SDCS Relief Valve isolation valve pair being INOPERABLE shall be verified to be in the power-lock open condition until the INOPERABLE SDCS Relief Valve isolation valve pair is returned to OPERABLE status or the RCS is depressurized and vented. The power-lock open requirement is satisfied either with the AC breakers open for valve pair 2HV9337 and 2HV9339 or the inverter input and output breakers open for valve pair 2HV9377 and 2HV9378, whichever valve pair is OPERABLE.

4.4.8.3.1.4 The RCS vent shall be verified to be open at least once per 12 hours when the vent is being used for overpressure protection.

* Except when the vent pathway is provided with a valve which is locked, sealed, or otherwise secured in the open position, then verify these valves open at least once per 31 days.

EMERGENCY CORE COOLING SYSTEMS

3/4.5.3 ECCS SUBSYSTEMS - Tavq LESS THAN 350°F

LIMITING CONDITION FOR OPERATION

3.5.3 As a minimum, one ECCS subsystem comprised of the following shall be OPERABLE:

- a. One OPERABLE high-pressure safety injection pump, and
- b. An OPERABLE flow path capable of taking suction from the refueling water tank on a Safety Injection Actuation Signal and automatically transferring suction to the containment sump on a Recirculation Actuation Signal.

APPLICABILITY: MODES 3* and 4.**

ACTION:

- a. With no ECCS subsystem OPERABLE, restore at least one ECCS subsystem to OPERABLE status within 1 hour or be in COLD SHUTDOWN within the next 20 hours.
- b. In the event the ECCS is actuated and injects water into the Reactor Coolant System, a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 90 days describing the circumstances of the actuation and the total accumulated actuation cycles to date. The current value of the usage factor for each affected safety injection nozzle shall be provided in this Special Report whenever its value exceeds 0.70.

SURVEILLANCE REQUIREMENTS

4.5.3 The ECCS subsystem shall be demonstrated OPERABLE per the applicable Surveillance Requirements of 4.5.2.

*With pressurizer pressure less than 400 psia.

** See Specification 3.4.8.3.1 for the limit on the number of High Pressure Safety Injection Pumps OPERABLE in Mode 4.

REACTOR COOLANT SYSTEM

BASES

PRESSURE/TEMPERATURE LIMITS (Continued)

The OPERABILITY of the Shutdown Cooling System relief valve or a RCS vent opening of greater than 5.6 square inches ensures that the RCS will be protected from pressure transients which could exceed the limits of Appendix G to 10 CFR Part 50 when one or more of the RCS cold legs are less than or equal to that specified in Table 3.4-3. The Shutdown Cooling System relief valve has adequate relieving capability to protect the RCS from overpressurization when the transient is limited to either (1) the start of an idle RCP with the secondary water temperature of the steam generator less than or equal to 100°F above the RCS cold leg temperatures or (2) inadvertent safety injection actuation with two HPSI pumps injecting into a water-solid RCS with full charging capacity and letdown isolated.

The design basis of the LTOP assumes unrestricted flow from two HPSI pumps and three Charging pumps (full charging capacity) without letdown. Because there are three HPSI pumps and three charging pumps, the limitation on the number of HPSI pumps to be maintained OPERABLE during the specified MODES ensures that a mass addition to the RCS that exceeds the design basis assumptions of the LTOP will not occur. This limitation on the number of HPSI pumps that can provide makeup and injection to the RCS implements the guidance provided in Generic Letter 90-06.

The 24-hour Allowable Outage Time (AOT) for a single channel SDCS Relief Valve isolation valve(s) increases the availability of the LTOP system to mitigate low temperature overpressure transients especially during MODES 5 and 6 when the potential for these transients are highest (RCS temperatures between 80°F and 190°F and the RCS is water-solid). The 24-hour AOT implements the guidance provided in Generic Letter 90-06.

One SDCS Relief Valve isolation valve pair is capable of mitigating an LTOP event that is bounded by the limiting SDCS pressure transients. When one or both SDCS Relief Valve isolation valve(s) in one isolation valve pair becomes INOPERABLE, the other OPERABLE SDCS Relief Valve isolation valve pair is placed in a power-lock open condition to preclude a single failure which might cause undesired mechanical motion of one or both of the OPERABLE SDCS Relief Valve isolation valve(s) in a single isolation valve pair and result in loss of system function. This power-lock open condition of the OPERABLE SDCS Relief Valve isolation valve pair is consistent with the guidance provided in Branch Technical Position ICSB 18 (PSB), "Application of the Single Failure Criterion to Manually-Controlled Electrically-Operated Valves."

3/4.4.9 STRUCTURAL INTEGRITY

The inservice inspection and testing programs for ASME Code Class 1, 2 and 3 components ensure that the structural integrity and operational readiness of these components will be maintained at an acceptable level throughout the life of the plant. These programs are in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR Part 50.55a(g) except where specific written relief has been granted by the Commission pursuant to 10 CFR part 50.55a(g)(6)(i).

REACTOR COOLANT SYSTEM

BASES

STRUCTURAL INTEGRITY (Continued)

Components of the reactor coolant system were designed to provide access to permit inservice inspections in accordance with Section XI of the ASME Boiler and Pressure Vessel Code, 1974 Edition and Addenda through Summer 1975.

3/4.4.10 REACTOR COOLANT GAS VENT SYSTEM

Reactor coolant system gas vents are provided to exhaust noncondensable gases from the primary system that could inhibit natural circulation core cooling following a non-design bases accident. The OPERABILITY of at least one reactor coolant system vent path from the reactor vessel head and the pressurizer steam space ensures the capability exists to perform this function.

The design redundancy of the Reactor Coolant Gas Vent System serves to minimize the probability of inadvertent or irreversible actuation while ensuring that a single failure of a vent valve, or control system does not prevent isolation of the vent path.

The function, capabilities, and testing requirements of the Reactor Coolant Gas Vent System are consistent with the requirements of Item II.b.1 of NUREG-0737, "Clarification of TMI Action Plan Requirements," November 1980.

EMERGENCY CORE COOLING SYSTEMS

BASES

ECCS SUBSYSTEMS (Continued)

With the RCS temperature below 350°F, one OPERABLE ECCS subsystem is acceptable without single failure consideration on the basis of the stable reactivity condition of the reactor and the limited core cooling requirements.

The Surveillance Requirements provided to ensure OPERABILITY of each component ensure that at a minimum, the assumptions used in the accident analyses are met and that subsystem OPERABILITY is maintained. Surveillance requirements for flow balance testing provide assurance that proper ECCS flows will be maintained in the event of a LOCA. Maintenance of proper flow resistance and pressure drop in the piping system to each injection point is necessary to: (1) prevent total pump flow from exceeding runout conditions when the system is in its minimum resistance configuration, (2) provide the proper flow split between injection points in accordance with the assumptions used in the ECCS-LOCA analyses, and (3) provide an acceptable level of total ECCS flow to all injection points equal to or above that assumed in the ECCS-LOCA analyses.

3/4.5.4 REFUELING WATER STORAGE TANK (RWST)

The OPERABILITY of the RWST as part of the ECCS ensures that a sufficient supply of borated water is available for injection by the ECCS in the event of a LOCA. The limits on RWST minimum volume and boron concentration ensure that 1) sufficient water is available within containment to permit recirculation cooling flow to the core, and 2) the reactor will remain subcritical in the cold condition following mixing of the RWST and the RCS water volumes with all control rods inserted except for the most reactive control assembly. The limit on maximum boron concentration is to ensure that boron does not precipitate in the core following LOCA. The limit on RWST solution temperature is to ensure that the assumptions used in the LOCA analyses remain valid.

ATTACHMENT D

**PROPOSED TECHNICAL SPECIFICATIONS
AND BASES**

UNIT 3

REACTIVITY CONTROL SYSTEMS

CHARGING PUMP - SHUTDOWN

LIMITING CONDITION FOR OPERATION

3.1.2.3 At least one charging pump or one high pressure safety injection pump in the boron injection flow path required OPERABLE pursuant to Specification 3.1.2.1 shall be OPERABLE and capable of being powered from an OPERABLE emergency power source.

APPLICABILITY: MODES 5 AND 6.

ACTION:

With no charging pump or high pressure safety injection pump OPERABLE or capable of being powered from an OPERABLE emergency power source, suspend all operations involving CORE ALTERATIONS or positive reactivity changes.

SURVEILLANCE REQUIREMENTS

4.1.2.3 No additional Surveillance Requirements other than those required by Specification 4.0.5.

* See Specification 3.4.8.3.1 for the limit on the number of High Pressure Safety Injection Pumps OPERABLE in Modes 5 and 6.

REACTOR COOLANT SYSTEM

OVERPRESSURE PROTECTION SYSTEMS

RCS TEMPERATURE \leq 302°F

LIMITING CONDITION FOR OPERATION

3.4.8.3.1 No more than two high-pressure safety injection pumps shall be OPERABLE and at least one of the following overpressure protection systems shall be OPERABLE:

- a. The Shutdown Cooling System Relief Valve (PSV9349) with:
 - 1) A lift setting of 406 ± 10 psig*, and
 - 2) Relief valve isolation valves 3HV9337, 3HV9339, 3HV9377, and 3HV9378 open, ~~or,~~
- OR,
- b. The Reactor Coolant System depressurized with an RCS vent of greater than or equal to 5.6 square inches.

APPLICABILITY: MODE 4 when the temperature of any one RCS cold leg is less than or equal to ~~that~~ the enable temperatures specified in Table 3.4-3; MODE 5; and MODE 6 with when the reactor vessel head is on the reactor vessel and the RCS is not vented.

ACTION:

- a. With the SDCS Relief Valve inoperable, reduce T_{avg} to less than 200°F, depressurize and vent the RCS through a greater than or equal to 5.6 square inch vent within the next 8 hours.
- b. With one or both SDCS Relief Valve isolation valves in a single SDCS Relief Valve isolation valve pair (valve pair 3HV9337 and 3HV9339 or valve pair 3HV9377 and 3HV9378) closed, open the closed valve(s) or power-lock open the other SDCS Relief Valve isolation valve pair within ~~7 days~~ 24 hours, or reduce T_{avg} to less than 200°F, depressurize and vent the RCS through a greater than or equal to 5.6 inch vent within the next 8 hours.
- c. With more than two high-pressure safety injection pumps OPERABLE, secure the third high-pressure safety injection pump by racking out its motor circuit breaker or locking close its discharge valve within 8 hours.

* The lift setting pressure applicable to valve temperatures of less than or equal to 130°F.

REACTOR COOLANT SYSTEM

LIMITING CONDITION FOR OPERATION

ACTION: (Continued)

- d. In the event either the SDCS Relief Valve or an RCS vent is used to mitigate an RCS pressure transient, a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 30 days. The report shall describe the circumstances initiating the transient, the effect of the SDCS Relief Valve or RCS vent on the transient and any corrective action necessary to prevent recurrence.
- e. The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.4.8.3.1.1 The SDCS Relief Valve shall be demonstrated OPERABLE by:

- a. Verifying at least once per 72 hours when the SDCS Relief Valve is being used for overpressure protection that SDCS Relief Valve isolation valves 3HV9337, 3HV9339, 3HV9377 and 3HV9378 are open.
- b. Verifying relief valve setpoint at least once per 30 months when tested pursuant to Specification 4.0.5.

4.4.8.3.1.2 At least once per 12 hours, the third high-pressure safety injection pump shall be demonstrated to be secured by verifying that its motor circuit breaker is not racked-in or its discharge valve is locked closed. The requirement to rack out the third HPSI pump breaker is satisfied with the pump breaker racked out to its disconnected or test position.

4.4.8.3.1.3 At least once per 12 hours, the OPERABLE SDCS Relief Valve isolation valve pair (valve pair 3HV9337 and 3HV9339, or valve pair 3HV9377 and 3HV9378) that is used for overpressure protection due to the other SDCS Relief Valve isolation valve pair being INOPERABLE shall be verified to be in the power-lock open condition until the INOPERABLE SDCS Relief Valve isolation valve pair is returned to OPERABLE status or the RCS is depressurized and vented. The power-lock open requirement is satisfied either with the AC breakers open for valve pair 3HV9337 and 3HV9339 or the inverter input and output breakers open for valve pair 3HV9377 and 3HV9378, whichever valve pair is OPERABLE.

4.4.8.3.1.4 The RCS vent shall be verified to be open at least once per 12 hours when the vent is being used for overpressure protection.

* Except when the vent pathway is provided with a valve which is locked, sealed, or otherwise secured in the open position, then verify these valves open at least once per 31 days.

EMERGENCY CORE COOLING SYSTEMS

3/4.5.3 ECCS SUBSYSTEMS - Tavg LESS THAN 350°F

LIMITING CONDITION FOR OPERATION

3.5.3 As a minimum, one ECCS subsystem comprised of the following shall be OPERABLE:

- a. One OPERABLE high-pressure safety injection pump, and
- b. An OPERABLE flow path capable of taking suction from the refueling water tank on a Safety Injection Actuation Signal and automatically transferring suction to the containment sump on a Recirculation Actuation Signal.

APPLICABILITY: MODES 3* and 4.**

ACTION:

- a. With no ECCS subsystem OPERABLE, restore at least one ECCS subsystem to OPERABLE status within 1 hour or be in COLD SHUTDOWN within the next 20 hours.
- b. In the event the ECCS is actuated and injects water into the Reactor Coolant System, a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 90 days describing the circumstances of the actuation and the total accumulated actuation cycles to date. The current value of the usage factor for each affected safety injection nozzle shall be provided in this Special Report whenever its value exceeds 0.70.

SURVEILLANCE REQUIREMENTS

4.5.3 The ECCS subsystem shall be demonstrated OPERABLE per the applicable Surveillance Requirements of 4.5.2.

* With pressurizer pressure less than 400 psia.

** See Specification 3.4.8.3.1 for the limit on the number of OPERABLE High Pressure Safety Injection Pumps

REACTOR COOLANT SYSTEM

BASES

PRESSURE/TEMPERATURE LIMITS (Continued)

The OPERABILITY of the Shutdown Cooling System relief valve or an RCS vent opening of greater than 5.6 square inches ensures that the RCS will be protected from pressure transients which could exceed the limits of Appendix G to 10 CFR Part 50 when one or more of the RCS cold legs is less than or equal to that specified in Table 3.4-3. The Shutdown Cooling System relief valve has adequate relieving capability to protect the RCS from overpressurization when the transient is limited to either (1) the start of an idle RCP with the secondary water temperature of the steam generator less than or equal to 100°F above the RCS cold leg temperatures or (2) inadvertent safety injection actuation with two HPSI pumps injecting into a water-solid RCS with full charging capacity and letdown isolated.

The design basis of the LTOP assumes unrestricted flow from two HPSI pumps and three Charging pumps (full charging capacity) without letdown. Because there are three HPSI pumps and three charging pumps, the limitation on the number of HPSI pumps to be maintained OPERABLE during the specified MODES ensures that a mass addition to the RCS that exceeds the design basis assumptions of the LTOP will not occur. This limitation on the number of HPSI pumps that can provide makeup and injection to the RCS implements the guidance provided in Generic Letter 90-06.

The 24-hour Allowable Outage Time (AOT) for a single channel SDCS Relief Valve isolation valve(s) increases the availability of the LTOP system to mitigate low temperature overpressure transients especially during MODES 5 and 6 when the potential for these transients are highest (RCS temperatures between 80°F and 190°F and the RCS is water-solid). The 24-hour AOT implements the guidance provided in Generic Letter 90-06.

One SDCS Relief Valve isolation valve pair is capable of mitigating an LTOP event that is bounded by the limiting SDCS pressure transients. When one or both SDCS Relief Valve isolation valve(s) in one isolation valve pair becomes INOPERABLE, the other OPERABLE SDCS Relief Valve isolation valve pair is placed in a power-lock open condition to preclude a single failure which might cause undesired mechanical motion of one or both of the OPERABLE SDCS Relief Valve isolation valve(s) in a single isolation valve pair and result in loss of system function. This power-lock open condition of the OPERABLE SDCS Relief Valve isolation valve pair is consistent with the guidance provided in Branch Technical Position ICSB 18 (PSB), "Application of the Single Failure Criterion to Manually-Controlled Electrically-Operated Valves."

3/4.4.9 STRUCTURAL INTEGRITY

The inservice inspection and testing programs for ASME Code Class 1, 2 and 3 components ensure that the structural integrity and operational readiness of these components will be maintained at an acceptable level throughout the life of the plant. These programs are in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR Part 50.55a(g) except where specific written relief has been granted by the Commission pursuant to 10 CFR part 50.55a(g)(6)(i).

REACTOR COOLANT SYSTEM

BASES

PRESSURE/TEMPERATURE LIMITS (Continued)

Components of the Reactor Coolant System were designed to provide access to permit inservice inspections in accordance with Section XI of the ASME Boiler and Pressure Vessel Code, 1974 Edition and Addenda through Summer 1975.

3/4.4.10 REACTOR COOLANT GAS VENT SYSTEM

Reactor coolant system gas vents are provided to exhaust noncondensable gases from the primary system that could inhibit natural circulation core cooling following a non-design bases accident. The OPERABILITY of at least one reactor coolant system vent path from the reactor vessel head and the pressurizer steam space ensures the capability exists to perform this function.

The design redundancy of the Reactor Coolant Gas Vent System serves to minimize the probability of inadvertent or irreversible actuation while ensuring that a single failure of a vent valve, or control system does not prevent isolation of the vent path.

The function, capabilities, and testing requirements of the Reactor Coolant Gas Vent System are consistent with the requirements of Item II.b.1 of NUREG-0737, "Clarification of TMI Action Plan Requirements," November 1980.