point-by-point compar son of the steady state and finite heatup rate data. At any given temperature, the allowable pressure is taken to be the lesser of the I two values taken from the curves under consideration. The composite curve is then adjusted to allow for possible errors in the pressure and temperature sensing instruments.

The use of the composite curve is mandatory in setting heatup limitations because it is possible for conditions to exist such that over the course of the heatup ramp the controlling analysis switches from the O.D. to the I.D. location; and the pressure limit must, at all times, be based on the most conservative case. The cooldown analysis proceeds in the same fashion as that for heatup, with the exception that the controlling location is always at the I.D. position. The thermal gradients induced during cooldown tend to produce tensile stresses at the I.D. location and compressive stresses at the O.D. position. Thus, the I.D. flaw is clearly the worst case.

As in the case of heatup, allowable pressure temperature relations are generated for both steady state and finite cooldown rate situations. Composite limit curves are then constructed for each cooldown rate of interest. Again adjustments are made to account for pressure and temperature instrumentation error.

The overpressure protection system consists of two operable pressurizer Power-Operated Relief Valves (PORVs) connected to the nitrogen supply system, backup nitrogen accumulators, the station instrument air system, and the associated electronics.

The TS requirements for low-temperature overpressure protection (LTOP) apply when  $T_{\text{avg}}$  is less than 350°F and the RCS is not vented to the containment. During these conditions, one train (or channel) of the LTOP system is capable of mitigating an LTOP event that is bounded by the largest mass addition to the RCS or by the largest increase in RCS temperature that can occur. The largest mass addition to the RCS is limited based upon the assumption that no more than a fixed number of pumps are capable of providing makeup or injection into the RCS. Hence, this is a matter important to safety that pumps in excess of this design basis assumption for LTOP not be capable of providing makeup or injection to the