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B 3.3 INSTRUMENTATION

B 3.3.1 Reactor Trip System (RTS) Instrumentation

BASES

BACKGROUND

The RTS initiates a unit shutdown, based on the values of selected unit parameters, to protect against violating the core fuel design limits and Reactor Coolant System (RCS) pressure boundary during anticipated operational occurrences (AOOs) and to assist the Engineered Safety Features (ESF) Systems in mitigating accidents.

The protection and monitoring systems have been designed to assure safe operation of the reactor. This is achieved by specifying limiting safety system settings (LSSS) in terms of parameters directly monitored by the RTS, as well as specifying LCOs on other reactor system parameters and equipment performance.

The LSSS, defined in this specification as the Allowable Values, in conjunction with the LCOs, establish the threshold for protective system action to prevent exceeding acceptable limits during Design Basis Accidents (DBAs).

During AOOs, which are those events expected to occur one or more times during the unit life, the acceptable limits are:

1. The Departure from Nucleate Boiling Ratio (DNBR) shall be maintained above the Safety Limit (SL) value to prevent departure from nucleate boiling (DNB);
2. Fuel centerline melt shall not occur; and
3. The RCS pressure SL of 2735 psig shall not be exceeded.

Operation within the SLs of Specification 2.0, "Safety Limits (SLs)," also maintains the above values and assures that offsite dose will be within the 10 CFR 20 and 10 CFR 100 criteria during AOOs.

Accidents are events that are analyzed even though they are not expected to occur during the unit life. The acceptable limit during accidents is that offsite dose shall be maintained within an acceptable fraction of 10 CFR 100 limits. Different accident categories are allowed a different fraction of these limits, based on probability of occurrence. Meeting the acceptable dose limit for an accident category is considered having acceptable consequences for that event.

BASES

BACKGROUND (continued)

The RTS instrumentation is segmented into four distinct but interconnected categories as illustrated in UFSAR, Chapter 7 (Ref. 1), and as identified below:

1. Field transmitters or process sensors: provide a measurable electronic signal based upon the physical characteristics of the parameter being measured;
2. Process monitoring systems, including the Process Control System, the Nuclear Instrumentation System (NIS), and various field contacts and sensors: monitors various plant parameters, provides any required signal processing, and provides digital outputs when parameters exceed predetermined limits. They may also provide outputs for control, indication, alarm, computer input, and recording;
3. Solid State Protection System (SSPS), including input, logic, and output bays: combines the input signals from the process monitoring systems per predetermined logic and initiates a reactor trip and ESF actuation when warranted by the process monitoring systems inputs; and
4. Reactor trip switchgear, including reactor trip breakers (RTBs) and bypass breakers: provides the means to interrupt power to the control rod drive mechanisms (CRDMs) and allows the rod cluster control assemblies (RCCAs), or "rods," to fall into the core and shut down the reactor. The bypass breakers allow testing of the RTBs at power.

Field Transmitters or Sensors

To meet the design demands for redundancy and reliability, more than one, and often as many as four, field transmitters or sensors are used to measure unit parameters. To account for the calibration tolerances and instrument drift, which are assumed to occur between calibrations, statistical allowances are provided NOMINAL TRIP SETPOINT Values. The OPERABILITY of each transmitter or sensor can be evaluated when its "as found" calibration data are compared against its documented acceptance criteria.

BASES

BACKGROUND (continued)

Process Monitoring Systems

Generally, three or four channels of process control equipment are used for the signal processing of unit parameters measured by the field instruments. The process control equipment provides signal conditioning, compatible output signals for instruments located on the main control board, and comparison of measured input signals with setpoints established by safety analyses. These setpoints are defined in UFSAR, Chapter 7 (Ref. 1), Chapter 6 (Ref. 2), and Chapter 15 (Ref. 3). If the measured value of a unit parameter exceeds the predetermined setpoint, an output from a bistable is forwarded to the SSPS for decision logic processing. Channel separation is maintained up to and through the input bays. However, not all unit parameters require four channels of sensor measurement and signal processing. Some unit parameters provide input only to the SSPS, while others provide input to the SSPS, the main control board, the unit computer, and one or more control systems.

Generally, if a parameter is used only for input to the protection circuits, three channels with a two-out-of-three logic are sufficient to provide the required reliability and redundancy. If one channel fails in a direction that would not result in a partial Function trip, the Function is still OPERABLE with a two-out-of-two logic. If one channel fails, such that a partial Function trip occurs, a trip will not occur and the Function is still OPERABLE with a one-out-of-two logic.

Generally, if a parameter is used for input to the SSPS and a control function, four channels with a two-out-of-four logic are sufficient to provide the required reliability and redundancy. The circuit must be able to withstand both an input failure to the control system, which may then require the protection function actuation, and a single failure in the other channels providing the protection function actuation. Again, a single failure will neither cause nor prevent the protection function actuation. These requirements are described in IEEE-279-1971 (Ref. 4). The actual number of channels required for each unit parameter is specified in Reference 1.

Two logic channels are required to ensure no single random failure of a logic channel will disable the RTS. The logic channels are designed such that testing required while the reactor is at power may be accomplished without causing a trip. Provisions to allow removing logic channels from service during maintenance are unnecessary because of the logic system's designed reliability.

BASES

BACKGROUND (continued)

Trip Setpoints and Allowable Values

The NOMINAL TRIP SETPOINTS are the nominal values at which the bistables are set. Any bistable is considered to be properly adjusted when the "as left" value is within the band for CHANNEL CALIBRATION tolerance.

The NOMINAL TRIP SETPOINTS used in the bistables are based on the analytical limits (Ref. 1, 2, and 3). The selection of these NOMINAL TRIP SETPOINTS is such that adequate protection is provided when all sensor and processing time delays, calibration tolerances, instrumentation uncertainties, instrument drift, and severe environment errors for those RTS channels that must function in harsh environments as defined by 10 CFR 50.49 (Ref. 5) are taken into account. The actual as-left Setpoint of the bistable assures that the actual trip occurs in time to prevent an analytical limit from being exceeded.

The Allowable Value accounts for changes in random measurement errors between COTs. One example of such a change in measurement error is drift during the surveillance interval. If the COT demonstrates that the loop trips within the Allowable Value, the loop is OPERABLE. A trip within the Allowable Value ensures that the predictions of equipment performance used to develop the NOMINAL TRIP SETPOINT are still valid, and that the equipment will initiate a trip in response to an AOO in time to prevent an analytical limit from being exceeded (and that the consequences of DBAs will be acceptable, providing the unit is operated from within the LCOs at the onset of the AOO or DBA and the equipment functions as designed). Note that in the accompanying LCO 3.3.1, the Allowable Values of Table 3.3.1-1 are the LSSS.

Each channel of the process control equipment can be tested on line to verify that the signal or setpoint accuracy is within the specified allowance requirements. Once a designated channel is taken out of service for testing, a simulated signal is injected in place of the field instrument signal. The process equipment for the channel in test is then tested, verified, and calibrated. SRs for the channels are specified in the SRs section.

Determination of the NOMINAL TRIP SETPOINTS and Allowable Values listed in Table 3.3.1-1 incorporate all of the known uncertainties applicable for each channel. The magnitudes of these uncertainties are factored into the determination of each NOMINAL TRIP SETPOINT. All field sensors and signal processing equipment for these channels are assumed to operate within the allowances of these uncertainty magnitudes.

BASES

BACKGROUND (continued)

Solid State Protection System

The SSPS equipment is used for the decision logic processing of outputs from the signal processing equipment bistables. To meet the redundancy requirements, two trains of SSPS, each performing the same functions, are provided. If one train is taken out of service for maintenance or test purposes, the second train will provide reactor trip and/or ESF actuation for the unit. If both trains are taken out of service or placed in test, a reactor trip will result. Each train is packaged in its own cabinet for physical and electrical separation to satisfy separation and independence requirements. The system has been designed to trip the reactor in the event of a loss of power, directing the unit to a safe shutdown condition.

The SSPS performs the decision logic for actuating a reactor trip or ESF actuation, generates the electrical output signal that will initiate the required trip or actuation, and provides the status, permissive, and annunciator output signals to the main control room of the unit.

The outputs from the process monitoring systems are sensed by the SSPS equipment and combined into logic matrices that represent combinations indicative of various unit upset and accident transients. If a logic matrix combination is completed, the system will initiate a reactor trip or send actuation signals via master and slave relays to those components whose aggregate Function best serves to alleviate the condition and restore the unit to a stable condition. Examples are given in the Applicable Safety Analyses, LCO, and Applicability sections of this Bases.

Reactor Trip Switchgear

The RTBs are in the electrical power supply line from the control rod drive motor generator set power supply to the CRDMs. Opening of the RTBs interrupts power to the CRDMs, which allows the shutdown rods and control rods to fall into the core by gravity. Each RTB is equipped with a bypass breaker to allow testing of the RTB while the unit is at power. During normal operation the output from the SSPS is a voltage signal that energizes the undervoltage coils in the RTBs and bypass breakers, if in use. When the required logic matrix combination is completed, the SSPS output voltage signal is removed, the undervoltage coils are de-energized, the breaker trip lever is actuated by a compressed spring that is released by de-energizing the undervoltage coil, and the RTBs and bypass breakers are tripped open. This allows the shutdown rods and control rods to fall into the core. In addition to the de-energization of the undervoltage coils, each breaker is also equipped

BASES

BACKGROUND (continued)

with a shunt trip device that is energized to trip the breaker open upon receipt of a reactor trip signal from the SSPS. Either the undervoltage coil or the shunt trip mechanism is sufficient by itself, thus providing a diverse trip mechanism.

The decision logic matrix Functions are described in the functional diagrams included in Reference 1. In addition to the reactor trip or ESF, these diagrams also describe the various "permissive interlocks" that are associated with unit conditions. Each train has a built in testing device that can test the decision logic matrix Functions and the actuation devices while the unit is at power. When any one train is taken out of service for testing, the other train is capable of providing unit monitoring and protection until the testing has been completed. The testing device is semiautomatic to minimize testing time.

APPLICABLE
SAFETY ANALYSES,
LCO, and
APPLICABILITY

The RTS functions to maintain the SLs during all AOOs and mitigates the consequences of DBAs in all MODES in which the RTBs are closed.

Each of the analyzed accidents and transients can be detected by one or more RTS Functions. The accident analysis described in Reference 3 takes credit for most RTS trip Functions. RTS trip Functions not specifically credited in the accident analysis are qualitatively credited in the safety analysis and the NRC staff approved licensing basis for the unit. These RTS trip Functions may provide protection for conditions that do not require dynamic transient analysis to demonstrate Function performance. They may also serve as backups to RTS trip Functions that were credited in the accident analysis.

The LCO requires all instrumentation performing an RTS Function, listed in Table 3.3.1-1 in the accompanying LCO, to be OPERABLE. Failure of any instrument renders the affected channel(s) inoperable and reduces the reliability of the affected Functions.

The LCO generally requires OPERABILITY of three or four channels in each instrumentation Function, two channels of Manual Reactor Trip in each logic Function, and two trains in each Automatic Trip Logic Function. Four OPERABLE instrumentation channels in a two-out-of-four configuration are required when one RTS channel is also used as a control system input. This configuration accounts for the possibility of the shared channel failing in such a manner that it creates a transient that requires RTS action. In this case, the RTS will still provide protection, even with random failure of one of the other three protection channels.

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

Three operable instrumentation channels in a two-out-of-three configuration are generally required when there is no potential for control system and protection system interaction that could simultaneously create a need for RTS trip and disable one RTS channel. The two-out-of-three and two-out-of-four configurations allow one channel to be tripped during maintenance or testing without causing a reactor trip. Specific exceptions to the above general philosophy exist and are discussed below.

Reactor Trip System Functions

The safety analyses and OPERABILITY requirements applicable to each RTS Function are discussed below:

1. Manual Reactor Trip

The Manual Reactor Trip ensures that the control room operator can initiate a reactor trip at any time by using either of two reactor trip switches in the control room. A Manual Reactor Trip accomplishes the same results as any one of the automatic trip Functions. It may be used by the reactor operator to shut down the reactor whenever any parameter is rapidly trending toward its Trip Setpoint.

The LCO requires two Manual Reactor Trip channels to be OPERABLE. Each channel is controlled by a manual reactor trip switch. Each channel actuates one or more reactor trip breakers in both trains. Two independent channels are required to be OPERABLE so that no single random failure will disable the Manual Reactor Trip Function.

In MODE 1 or 2, manual initiation of a reactor trip must be OPERABLE. These are the MODES in which the shutdown rods and/or control rods are partially or fully withdrawn from the core. In MODE 3, 4, or 5, the manual initiation Function must also be OPERABLE if the shutdown rods or control rods are withdrawn or the Control Rod Drive (CRD) System is capable of withdrawing the shutdown rods or the control rods. In this condition, inadvertent control rod withdrawal is possible. In MODE 3, 4, or 5, manual initiation of a reactor trip does not have to be OPERABLE if the CRD System is not capable of withdrawing the shutdown rods or control rods. If the rods cannot be withdrawn from the core, there is no need to be able to trip the reactor because all of the rods are inserted. In MODE 6, the CRDMs are disconnected from the control rods and shutdown rods. Therefore, the manual initiation Function is not required.

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

2. Power Range Neutron Flux

The NIS power range detectors are located external to the reactor vessel and measure neutrons leaking from the core. The NIS power range detectors provide input to the Rod Control System and the Steam Generator (SG) Water Level Control System. Therefore, the actuation logic must be able to withstand an input failure to the control system, which may then require the protection function actuation, and a single failure in the other channels providing the protection function actuation. Note that this Function also provides a signal to prevent automatic and manual rod withdrawal prior to initiating a reactor trip. Limiting further rod withdrawal may terminate the transient and eliminate the need to trip the reactor.

a. Power Range Neutron Flux—High

The Power Range Neutron Flux—High trip Function ensures that protection is provided, from all power levels, against a positive reactivity excursion leading to DNB during power operations. These can be caused by rod withdrawal or reductions in RCS temperature.

The LCO requires all four of the Power Range Neutron Flux—High channels to be OPERABLE.

In MODE 1 or 2, when a positive reactivity excursion could occur, the Power Range Neutron Flux—High trip must be OPERABLE. This Function will terminate the reactivity excursion and shut down the reactor prior to reaching a power level that could damage the fuel. In MODE 3, 4, 5, or 6, the NIS power range detectors cannot detect neutron levels in this range. In these MODES, the Power Range Neutron Flux—High does not have to be OPERABLE because the reactor is shut down and reactivity excursions into the power range are extremely unlikely. Other RTS Functions and administrative controls provide protection against reactivity additions when in MODE 3, 4, 5, or 6.

BASES

APPLICABLE SAFETY ANALYSES, LCO and APPLICABILITY (continued)

b. Power Range Neutron Flux—Low

The LCO requirement for the Power Range Neutron Flux—Low trip Function ensures that protection is provided against a positive reactivity excursion from low power or subcritical conditions.

The LCO requires all four of the Power Range Neutron Flux—Low channels to be OPERABLE.

In MODE 1, below the Power Range Neutron Flux (P-10 setpoint), and in MODE 2, the Power Range Neutron Flux—Low trip must be OPERABLE. This Function may be manually blocked by the operator when two out of four power range channels are greater than approximately 10% RTP (P-10 setpoint). This Function is automatically unblocked when three out of four power range channels are below the P-10 setpoint. Above the P-10 setpoint, positive reactivity additions are mitigated by the Power Range Neutron Flux—High trip Function.

In MODE 3, 4, 5, or 6, the Power Range Neutron Flux—Low trip Function does not have to be OPERABLE because the reactor is shut down and the NIS power range detectors cannot detect neutron levels in this range. Other RTS trip Functions and administrative controls provide protection against positive reactivity additions or power excursions in MODE 3, 4, 5, or 6.

3. Power Range Neutron Flux—High Positive Rate

The Power Range Neutron Flux - High Positive Rate trip uses the same channels as discussed for Function 2 above.

The Power Range Neutron Flux—High Positive Rate trip Function ensures that protection is provided against rapid increases in neutron flux that are characteristic of an RCCA drive rod housing rupture and the accompanying ejection of the RCCA. This Function complements the Power Range Neutron Flux-High and Low Setpoint trip Functions to ensure that the criteria are met for a rod ejection from the power range.

The LCO requires all four of the Power Range Neutron Flux-High Positive Rate channels to be OPERABLE.

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

In MODE 1 or 2, when there is a potential to add a large amount of positive reactivity from a rod ejection accident (REA), the Power Range Neutron Flux—High Positive Rate trip must be OPERABLE. In MODE 3, 4, 5, or 6, the Power Range Neutron Flux—High Positive Rate trip Function does not have to be OPERABLE because other RTS trip Functions and administrative controls will provide protection against positive reactivity additions. In MODE 6, no rods are withdrawn and the SDM is increased during refueling operations. The reactor vessel head is also removed or the closure bolts are detensioned preventing any pressure buildup. In addition, the NIS power range detectors cannot detect neutron levels present in this mode.

4. Intermediate Range Neutron Flux

The Intermediate Range Neutron Flux trip Function ensures that protection is provided against an uncontrolled RCCA bank rod withdrawal accident from a subcritical condition during startup. This trip Function provides redundant protection to the Power Range Neutron Flux-Low Setpoint trip Function. The NIS intermediate range detectors are located external to the reactor vessel and measure neutrons leaking from the core. Note that this Function also provides a signal to prevent automatic and manual rod withdrawal prior to initiating a reactor trip. Limiting further rod withdrawal may terminate the transient and eliminate the need to trip the reactor.

The LCO requires two channels of Intermediate Range Neutron Flux to be OPERABLE. Two OPERABLE channels are sufficient to ensure no single random failure will disable this trip Function.

Because this trip Function is important only during startup, there is generally no need to disable channels for testing while the Function is required to be OPERABLE. Therefore, a third channel is unnecessary.

In MODE 1 below the P-10 setpoint, and in MODE 2, when there is a potential for an uncontrolled RCCA bank rod withdrawal accident during reactor startup, the Intermediate Range Neutron Flux trip must be OPERABLE. Above the P-10 setpoint, the Power Range Neutron Flux-High Setpoint trip and the Power Range Neutron Flux-High Positive Rate trip provide core protection for a rod withdrawal accident. In MODE 3, 4, or 5, the Intermediate Range Neutron Flux trip does not have to be OPERABLE because other RTS trip functions provide protection against positive reactivity additions. The reactor cannot be started up in this condition. The core also has the required SDM to mitigate the consequences of a positive reactivity addition accident. In

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

MODE 6, all rods are fully inserted and the core has a required increased SDM.

5. Source Range Neutron Flux

The LCO requirement for the Source Range Neutron Flux trip Function ensures that protection is provided against an uncontrolled RCCA bank rod withdrawal accident from a subcritical condition during startup. This trip Function provides redundant protection to the Power Range Neutron Flux-Low Setpoint and Intermediate Range Neutron Flux trip Functions. In MODES 3, 4, and 5, administrative controls also prevent the uncontrolled withdrawal of rods. The NIS source range detectors are located external to the reactor vessel and measure neutrons leaking from the core. The NIS source range detectors do not provide any inputs to control systems. The source range trip is the only RTS automatic protection function required in MODES 3, 4, and 5 with the CRD System capable of rod withdrawal. Therefore, the functional capability at the specified Trip Setpoint is assumed to be available.

The LCO requires two channels of Source Range Neutron Flux to be OPERABLE. Two OPERABLE channels are sufficient to ensure no single random failure will disable this trip Function. The LCO also requires one channel of the Source Range Neutron Flux to be OPERABLE in MODE 3, 4, or 5 with RTBs open. In this case, the source range Function is to provide control room indication. The outputs of the Function to RTS logic are not required OPERABLE when the RTBs are open.

The Source Range Neutron Flux Function provides protection for control rod withdrawal from subcritical, boron dilution, and control rod ejection events. The Function also provides visual neutron flux indication in the control room.

In MODE 2 when below the P-6 setpoint during a reactor startup, the Source Range Neutron Flux trip must be OPERABLE. Above the P-6 setpoint, the Intermediate Range Neutron Flux trip and the Power Range Neutron Flux—Low Setpoint trip will provide core protection for reactivity accidents. Above the P-6 setpoint, the Source Range Neutron Flux trip is blocked.

In MODE 3, 4, or 5 with the reactor shut down, the Source Range Neutron Flux trip Function must also be OPERABLE. If the CRD System is capable of rod withdrawal, the Source Range Neutron Flux trip must be OPERABLE to provide core protection against a rod

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

withdrawal accident. If the unit is to be in MODE 3 with the RTBs closed for > 4 hours the Surveillance requirement SR 3.3.1.7 must be completed within 4 hours after entry into MODE 3.

If the CRD System is not capable of rod withdrawal, the source range detectors are not required to trip the reactor. However, their monitoring Function must be OPERABLE to monitor core neutron levels and provide indication of reactivity changes that may occur as a result of events like a boron dilution.

A CHANNEL CHECK provides a comparison of the parameter indicated on one channel to a similar parameter on other channels. This is based on the assumption that the two indicating channels should be consistent. Significant differences between the indicating source range channels can occur due to core geometry, decreasing neutron count rate as temperature is decreasing in the system, the location of the Source Assemblies (distance from the Source Detectors), and large amounts of gamma. Each channel should be consistent with its local condition.

The requirements for the NIS source range detectors in MODE 6 are addressed in LCO 3.9.3, "Nuclear Instrumentation."

6. Overtemperature ΔT

The Overtemperature ΔT trip Function is provided to ensure that the design limit DNBR is met. This trip Function also limits the range over which the Overpower ΔT trip Function must provide protection. The inputs to the Overtemperature ΔT trip include pressurizer pressure, coolant temperature, axial power distribution, and reactor power as indicated by loop ΔT assuming full reactor coolant flow. Protection from violating the DNBR limit is assured for those transients that are slow with respect to delays from the core to the measurement system. The Function monitors both variation in power and flow since a decrease in flow has the same effect on ΔT as a power increase. The Overtemperature ΔT trip Function uses each loop's ΔT as a measure of reactor power and is compared with a setpoint that is automatically varied with the following parameters:

- reactor coolant average temperature—the Trip Setpoint is varied to correct for changes in coolant density and specific heat capacity with changes in coolant temperature;
- pressurizer pressure—the Trip Setpoint is varied to correct for changes in system pressure; and

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

axial power distribution— $f(\Delta I)$, the Trip Setpoint is varied to account for imbalances in the axial power distribution as detected by the NIS upper and lower power range detectors. If axial peaks are greater than the design limit, as indicated by the difference between the upper and lower NIS power range detectors, the Trip Setpoint is reduced in accordance with Note 1 of Table 3.3.1-1.

Dynamic compensation is included for system piping delays from the core to the temperature measurement system.

The Overtemperature ΔT trip Function is calculated for each loop as described in Note 1 of Table 3.3.1-1. Trip occurs if Overtemperature ΔT is indicated in two loops. The pressure and temperature signals are used for other control functions, therefore, the actuation logic must be able to withstand an input failure to the control system, which may then require the protection function actuation, and a single failure in the other channels providing the protection function actuation. Note that this Function also provides a signal to generate a turbine runback prior to reaching the Trip Setpoint. A turbine runback will reduce turbine power and reactor power. A reduction in power will normally alleviate the Overtemperature ΔT condition and may prevent a reactor trip.

The LCO requires all four channels of the Overtemperature ΔT trip Function to be OPERABLE. Note that the Overtemperature ΔT Function receives input from channels shared with other RTS Functions. Failures that affect multiple Functions require entry into the Conditions applicable to all affected Functions.

In MODE 1 or 2, the Overtemperature ΔT trip must be OPERABLE to prevent DNB. In MODE 3, 4, 5, or 6, this trip Function does not have to be OPERABLE because the reactor is not operating and there is insufficient heat production to be concerned about DNB.

7. Overpower ΔT

The Overpower ΔT trip Function ensures that protection is provided to ensure the integrity of the fuel (i.e., no fuel pellet melting and less than 1% cladding strain) under all possible overpower conditions. This trip Function also limits the required range of the Overtemperature ΔT trip Function and provides a backup to the Power Range Neutron Flux—High Setpoint trip. The Overpower ΔT trip Function ensures that the allowable heat generation rate (kW/ft) of the fuel is not exceeded. It

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

uses the ΔT of each loop as a measure of reactor power with a setpoint that is automatically varied with the following parameters:

- reactor coolant average temperature—the Trip Setpoint is varied to correct for changes in coolant density and specific heat capacity with changes in coolant temperature; and
- rate of change of reactor coolant average temperature—including dynamic compensation for the delays between the core and the temperature measurement system.

The Overpower ΔT trip Function is calculated for each loop as per Note 2 of Table 3.3.1-1. Trip occurs if Overpower ΔT is indicated in two loops. The temperature signals are used for other control functions, therefore, the actuation logic must be able to withstand an input failure to the control system, which may then require the protection function actuation, and a single failure in the remaining channels providing the protection function actuation. Note that this Function also provides a signal to generate a turbine runback prior to reaching the Trip Setpoint. A turbine runback will reduce turbine power and reactor power. A reduction in power will normally alleviate the Overpower ΔT condition and may prevent a reactor trip.

The LCO requires four channels of the Overpower ΔT trip Function to be OPERABLE. Note that the Overpower ΔT trip Function receives input from channels shared with other RTS Functions. Failures that affect multiple Functions require entry into the Conditions applicable to all affected Functions.

In MODE 1 or 2, the Overpower ΔT trip Function must be OPERABLE. These are the only times that enough heat is generated in the fuel to be concerned about the heat generation rates and overheating of the fuel. In MODE 3, 4, 5, or 6, this trip Function does not have to be OPERABLE because the reactor is not operating and there is insufficient heat production to be concerned about fuel overheating and fuel damage.

8. Pressurizer Pressure

The same sensors provide input to the Pressurizer Pressure—High and —Low trips and the Overtemperature ΔT trip. The Pressurizer Pressure channels are also used to provide input to the Pressurizer Pressure Control System, therefore, the actuation logic must be able to withstand an input failure to the control system, which may then require the

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

protection function actuation, and a single failure in the other channels providing the protection function actuation.

a. Pressurizer Pressure—Low

The Pressurizer Pressure—Low trip Function ensures that protection is provided against violating the DNBR limit due to low pressure.

The LCO requires four channels of Pressurizer Pressure—Low to be OPERABLE.

In MODE 1, when DNB is a major concern, the Pressurizer Pressure—Low trip must be OPERABLE. This trip Function is automatically enabled on increasing power by the P-7 interlock (NIS power range P-10 or turbine inlet pressure greater than approximately 10% of full power equivalent (P-13)). On decreasing power, this trip Function is automatically blocked below P-7. Below the P-7 setpoint, power distributions that would cause DNB concerns are unlikely.

b. Pressurizer Pressure-High

The Pressurizer Pressure-High trip Function ensures that protection is provided against overpressurizing the RCS. This trip Function operates in conjunction with the pressurizer relief and safety valves to prevent RCS overpressure conditions.

The LCO requires four channels of the Pressurizer Pressure—High to be OPERABLE.

The Pressurizer Pressure-High LSSS is selected to be below the pressurizer safety valve actuation pressure and above the power operated relief valve (PORV) setting. This setting minimizes challenges to safety valves while avoiding unnecessary reactor trips for those pressure increases that can be controlled by the PORVs.

In MODE 1 or 2, the Pressurizer Pressure—High trip must be OPERABLE to help prevent RCS overpressurization and minimize challenges to the safety valves. In MODE 3, 4, 5, or 6, the Pressurizer Pressure—High trip Function does not have to be OPERABLE because transients that could cause an overpressure condition will be slow to occur. Therefore, the operator will have sufficient time to evaluate unit

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

conditions and take corrective actions. Additionally, low temperature overpressure protection systems provide overpressure protection when below MODE 4.

9. Pressurizer Water Level-High

The Pressurizer Water Level-High trip Function provides a backup signal for the Pressurizer Pressure—High trip and also provides protection against water relief through the pressurizer safety valves. These valves are designed to pass steam in order to achieve their design energy removal rate. A reactor trip is actuated prior to the pressurizer becoming water solid. The setpoints are based on percent of instrument span. The LCO requires three channels of Pressurizer Water Level—High to be OPERABLE. The pressurizer level channels are used as input to the Pressurizer Level Control System. A fourth channel is not required to address control/protection interaction concerns. The level channels do not actuate the safety valves, and the high pressure reactor trip is set below the safety valve setting. Therefore, with the slow rate of charging available, pressure overshoot due to level channel failure cannot cause the safety valve to lift before reactor high pressure trip.

In MODE 1, when there is a potential for overfilling the pressurizer, the Pressurizer Water Level—High trip must be OPERABLE. This trip Function is automatically enabled on increasing power by the P-7 interlock. On decreasing power, this trip Function is automatically blocked below P-7. Below the P-7 setpoint, transients that could raise the pressurizer water level will be slow and the operator will have sufficient time to evaluate unit conditions and take corrective actions.

10. Reactor Coolant Flow-Low

a. Reactor Coolant Flow-Low (Single Loop)

The Reactor Coolant Flow-Low (Single Loop) trip Function ensures that protection is provided against violating the DNBR limit due to low flow in one or more RCS loops, while avoiding reactor trips due to normal variations in loop flow. Above the P-8 setpoint, which is approximately 48% RTP, a loss of flow in any RCS loop will actuate a reactor trip. The setpoints are based on the minimum flow specified in the COLR. Each RCS loop has three flow detectors to monitor flow. The flow signals are not used for any control system input.

The LCO requires three Reactor Coolant Flow-Low channels per loop to be OPERABLE in MODE 1 above P-8.

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

In MODE 1 above the P-8 setpoint, a loss of flow in one RCS loop could result in DNB conditions in the core. In MODE 1 below the P-8 setpoint, a loss of flow in two or more loops is required to actuate a reactor trip (Function 10.b) because of the lower power level and the greater margin to the design limit DNBR.

b. Reactor Coolant Flow-Low (Two Loops)

The Reactor Coolant Flow-Low (Two Loops) trip Function ensures that protection is provided against violating the DNBR limit due to low flow in two or more RCS loops while avoiding reactor trips due to normal variations in loop flow.

Above the P-7 setpoint and below the P-8 setpoint, a loss of flow in two or more loops will initiate a reactor trip. The setpoints are based on the minimum flow specified in the COLR. Each loop has three flow detectors to monitor flow. The flow signals are not used for any control system input.

The LCO requires three Reactor Coolant Flow-Low channels per loop to be OPERABLE.

In MODE 1 above the P-7 setpoint and below the P-8 setpoint, the Reactor Coolant Flow-Low (Two Loops) trip must be OPERABLE. Below the P-7 setpoint, all reactor trips on low flow are automatically blocked since power distributions that would cause a DNB concern at this low power level are unlikely. Above the P-7 setpoint, the reactor trip on low flow in two or more RCS loops is automatically enabled. Above the P-8 setpoint, a loss of flow in any one loop will actuate a reactor trip because of the higher power level and the reduced margin to the design limit DNBR.

11. Undervoltage Reactor Coolant Pumps

The Undervoltage RCPs reactor trip Function ensures that protection is provided against violating the DNBR limit due to a loss of flow in two or more RCS loops. The voltage to each RCP is monitored. Above the P-7 setpoint, a loss of voltage detected on two or more RCP buses will initiate a reactor trip. This trip Function will generate a reactor trip before the Reactor Coolant Flow-Low (Two Loops) Trip Setpoint is reached. Time delays are incorporated into the Undervoltage RCPs channels to prevent reactor trips due to momentary electrical power transients.

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

The LCO requires a total of four Undervoltage RCPs channels (one per bus) to be OPERABLE.

In MODE 1 above the P-7 setpoint, the Undervoltage RCP trip must be OPERABLE. Below the P-7 setpoint, all reactor trips on loss of flow are automatically blocked since power distributions that would cause a DNB concern at this low power level are unlikely. Above the P-7 setpoint, the reactor trip on loss of flow in two or more RCS loops is automatically enabled.

12. Underfrequency Reactor Coolant Pumps

The Underfrequency RCPs reactor trip Function ensures that protection is provided against violating the DNBR limit due to a loss of flow in two or more RCS loops from a major network frequency disturbance. An underfrequency condition will slow down the pumps, thereby reducing their coastdown time following a pump trip. The proper coastdown time is required so that reactor heat can be removed immediately after reactor trip. The frequency of each RCP bus is monitored. Above the P-7 setpoint, a loss of frequency detected on two or more RCP buses will initiate a reactor trip. This trip Function will generate a reactor trip before the Reactor Coolant Flow-Low (Two Loops) Trip Setpoint is reached. Time delays are incorporated into the Underfrequency RCPs channels to prevent reactor trips due to momentary electrical power transients.

The LCO requires a total of four Underfrequency RCPs channels (one per bus) to be OPERABLE.

In MODE 1 above the P-7 setpoint, the Underfrequency RCPs trip must be OPERABLE. Below the P-7 setpoint, all reactor trips on loss of flow are automatically blocked since power distributions that would cause a DNB concern at this low power level are unlikely. Above the P-7 setpoint, the reactor trip on loss of flow in two or more RCS loops is automatically enabled.

13. Steam Generator Water Level-Low Low

The SG Water Level-Low Low trip Function ensures that protection is provided against a loss of heat sink and actuates the AFW System prior to uncovering the SG tubes. The SGs are the heat sink for the reactor. In order to act as a heat sink, the SGs must contain a minimum amount of water. A narrow range low low level in any SG is indicative of a loss of heat sink for the reactor. The level transmitters provide input to the SG Level Control System. Therefore, the actuation logic must be able to withstand an input failure to the control system, which may then require

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

the protection function actuation, and a single failure in the other channels providing the protection function actuation. This Function also performs the ESFAS function of starting the AFW pumps on low low SG level.

The LCO requires four channels of SG Water Level-Low Low per SG to be OPERABLE since these channels are shared between protection and control.

In MODE 1 or 2, when the reactor requires a heat sink, the SG Water Level-Low Low trip must be OPERABLE. The normal source of water for the SGs is the Main Feedwater (MFW) System (not safety related). The MFW System is normally in operation in MODES 1, 2, 3, or 4. The AFW System is the safety related backup source of water to ensure that the SGs remain the heat sink for the reactor. In MODE 3, 4, 5, or 6, the SG Water Level-Low Low Function does not have to be OPERABLE because the reactor is not operating or even critical. Decay heat removal is accomplished by the steam generators in MODE 3 and 4 and by the Residual Heat Removal (RHR) System in MODE 4, 5, or 6.

14. Turbine Trip

a. Turbine Trip-Low Fluid Oil Pressure

The Turbine Trip-Low Fluid Oil Pressure trip Function anticipates the loss of heat removal capabilities of the secondary system following a turbine trip. This trip Function acts to minimize the pressure/temperature transient on the reactor. Any turbine trip from a power level below the P-8 setpoint, approximately 48% power, will not actuate a reactor trip. Three pressure switches monitor the control oil pressure in the Turbine Electrohydraulic Control System. A low pressure condition sensed by two-out-of-three pressure switches will actuate a reactor trip. These pressure switches do not provide any input to the control system. The unit is designed to withstand a complete loss of load and not sustain core damage or challenge the RCS pressure limitations. Core protection is provided by the Pressurizer Pressure-High trip Function and RCS integrity is ensured by the pressurizer safety valves. Turbine Trip-Low fluid oil pressure is diverse to the Turbine Trip-Turbine Stop Valve Closure Function.

The LCO requires three channels of Turbine Trip-Low Fluid Oil Pressure to be OPERABLE in MODE 1 above P-8.

Below the P-8 setpoint, a turbine trip does not actuate a reactor trip. In MODE 2, 3, 4, 5, or 6, there is no potential for a turbine trip, and the Turbine Trip-Low Fluid Oil Pressure trip Function does not need to be OPERABLE.

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

b. Turbine Trip-Turbine Stop Valve Closure

The Turbine Trip-Turbine Stop Valve Closure trip Function anticipates the loss of heat removal capabilities of the secondary system following a turbine trip from a power level above the P-8 setpoint, approximately 48% power. The trip Function anticipates the loss of secondary heat removal capability that occurs when the stop valves close. Tripping the reactor in anticipation of loss of secondary heat removal acts to minimize the pressure and temperature transient on the reactor. This trip Function will not and is not required to operate in the presence of a single channel failure. The unit is designed to withstand a complete loss of load and not

sustain core damage or challenge the RCS pressure limitations. Core protection is provided by the Pressurizer Pressure—High trip Function, and RCS integrity is ensured by the pressurizer safety valves. This trip Function is diverse to the Turbine Trip—Low Fluid Oil Pressure trip Function. Each turbine stop valve is equipped with one limit switch that inputs to the RTS. If all four limit switches indicate that the stop valves are closed, a reactor trip is initiated.

The LSSS for this Function is set to assure channel trip occurs when the associated stop valve is completely closed.

The LCO requires four Turbine Trip—Turbine Stop Valve Closure channels, one per valve, to be OPERABLE in MODE 1 above P-8. All four channels must trip to cause reactor trip.

Below the P-8 setpoint, a load rejection can be accommodated by the Steam Dump System. In MODE 2, 3, 4, 5, or 6, there is no potential for a load rejection, and the Turbine Trip—Stop Valve Closure trip Function does not need to be OPERABLE.

15. Safety Injection Input from Engineered Safety Feature Actuation System

The SI Input from ESFAS ensures that if a reactor trip has not already been generated by the RTS, the ESFAS automatic actuation logic will initiate a reactor trip upon any signal that initiates SI. This is a condition of acceptability for the LOCA. However, other transients and accidents take credit for varying levels of ESF performance and rely upon rod insertion, except for the most reactive rod that is assumed to be fully

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

withdrawn, to ensure reactor shutdown. Therefore, a reactor trip is initiated every time an SI signal is present.

Trip Setpoint and Allowable Values are not applicable to this Function. The SI Input is provided by a manual switch or by the automatic actuation logic. Therefore, there is no measurement signal with which to associate an LSSS.

The LCO requires two trains of SI Input from ESFAS to be OPERABLE in MODE 1 or 2.

A reactor trip is initiated every time an SI signal is present. Therefore, this trip Function must be OPERABLE in MODE 1 or 2, when the reactor is critical, and must be shut down in the event of an accident. In MODE 3, 4, 5, or 6, the reactor is not critical, and this trip Function does not need to be OPERABLE.

16. Reactor Trip System Interlocks

Reactor protection interlocks are provided to ensure reactor trips are in the correct configuration for the current unit status. They back up operator actions to ensure protection system Functions are not bypassed during unit conditions under which the safety analysis assumes the Functions are not bypassed. Therefore, the interlock Functions do not need to be OPERABLE when the associated reactor trip functions are outside the applicable MODES. These are:

a. Intermediate Range Neutron Flux, P-6

The Intermediate Range Neutron Flux, P-6 interlock is actuated when any NIS intermediate range channel goes approximately three decades above the minimum channel reading. If both channels drop below the setpoint, the permissive will automatically be defeated. The LCO requirement for the P-6 interlock ensures that the following Functions are performed:

- on increasing power, the P-6 interlock allows the manual block of the NIS Source Range, Neutron Flux reactor trip. This prevents a premature block of the source range trip and allows the operator to ensure that the intermediate range is OPERABLE prior to leaving the source range; and
- on decreasing power, the P-6 interlock automatically enables the NIS Source Range Neutron Flux reactor trip.

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

The LCO requires two channels of Intermediate Range Neutron Flux, P-6 interlock to be OPERABLE in MODE 2 when below the P-6 interlock setpoint.

Above the P-6 interlock setpoint, the NIS Source Range Neutron Flux reactor trip will be blocked, and this Function will no longer be necessary.

In MODE 3, 4, 5, or 6, the P-6 interlock does not have to be OPERABLE because the NIS Source Range is providing core protection.

b. Low Power Reactor Trips Block, P-7

The Low Power Reactor Trips Block, P-7 interlock is actuated by input from either the Power Range Neutron Flux, P-10, or the Turbine Inlet Pressure, P-13 interlock. The LCO requirement for the P-7 interlock ensures that the following Functions are performed:

- (1) on increasing power, the P-7 interlock automatically enables reactor trips on the following Functions:
 - Pressurizer Pressure—Low;
 - Pressurizer Water Level—High;
 - Reactor Coolant Flow—Low (Two Loops);
 - Undervoltage RCPs; and
 - Underfrequency RCPs.

These reactor trips are only required when operating above the P-7 setpoint (approximately 10% power). The reactor trips provide protection against violating the DNBR limit. Below the P-7 setpoint, the RCS is capable of providing sufficient natural circulation without any RCP running.

- (2) on decreasing power, the P-7 interlock automatically blocks reactor trips on the following Functions:
 - Pressurizer Pressure—Low;
 - Pressurizer Water Level—High;

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

- Reactor Coolant Flow—Low (Two Loops);
- Undervoltage RCPs; and
- Underfrequency RCPs.

Trip Setpoint and Allowable Value are not applicable to the P-7 interlock because it is a logic Function and thus has no parameter with which to associate an LSSS.

The P-7 interlock is a logic Function with train and not channel identity. Therefore, the LCO requires one channel per train of Low Power Reactor Trips Block, P-7 interlock to be OPERABLE in MODE 1.

The low power trips are blocked below the P-7 setpoint and unblocked above the P-7 setpoint. In MODE 2, 3, 4, 5, or 6, this Function does not have to be OPERABLE because the interlock performs its Function when power level drops below 10% power, which is in MODE 1.

c. Power Range Neutron Flux, P-8

The Power Range Neutron Flux, P-8 interlock is actuated at approximately 48% power as determined by two-out-of-four NIS power range detectors. The P-8 interlock automatically enables the Reactor Coolant Flow—Low (Single Loop) reactor trip on low flow in one or more RCS loops, and the Turbine Trip-Low Fluid Oil Pressure and Turbine Trip-Turbine Stop Valve Closure reactor trips on increasing power. The LCO requirement for the Reactor Coolant Flow - Low Function ensures that protection is provided against a loss of flow in any RCS loop that could result in DNB conditions in the core when greater than approximately 48% power. Above the P-8 setpoint, a turbine trip will cause a load rejection beyond the capacity of the Steam Dump System. A reactor trip is automatically initiated on a turbine trip when it is above the P-8 setpoint, to minimize the transient on the reactor. On decreasing power below the P-8 setpoint, the reactor trip on low flow in any loop is automatically blocked.

The LCO requires four channels of Power Range Neutron Flux, P-8 interlock to be OPERABLE in MODE 1.

In MODE 1, a loss of flow in one RCS loop could result in DNB conditions and, a turbine trip could cause a load rejection beyond the capacity of the Steam Dump System, so the Power Range Neutron Flux, P-8 interlock must be OPERABLE. In MODE 2, 3,

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

4, 5, or 6, this Function does not have to be OPERABLE because the core is not producing sufficient power to be concerned about DNB conditions and the reactor is not at a power level sufficient to have a load rejection beyond the capacity of the Steam Dump System.

d. Power Range Neutron Flux, P-10

The Power Range Neutron Flux, P-10 interlock is actuated at approximately 10% power, as determined by two-out-of-four NIS power range detectors. If power level falls below 10% RTP on 3 of 4 channels, the nuclear instrument trips will be automatically unblocked. The LCO requirement for the P-10 interlock ensures that the following Functions are performed:

- on increasing power, the P-10 interlock allows the operator to manually block the Intermediate Range Neutron Flux reactor trip. Note that blocking the reactor trip also blocks the signal to prevent automatic and manual rod withdrawal;
- on increasing power, the P-10 interlock allows the operator to manually block the Power Range Neutron Flux—Low reactor trip;
- on increasing power, the P-10 interlock automatically provides a backup signal to block the Source Range Neutron Flux reactor trip, and also to de-energize the NIS Westinghouse-supplied source range detectors (the Westinghouse-supplied source range detectors are being replaced with Thermo Scientific-supplied detectors that remain energized);
- the P-10 interlock provides one of the two inputs to the P-7 interlock; and
- on decreasing power, the P-10 interlock automatically enables the Power Range Neutron Flux—Low reactor trip and the Intermediate Range Neutron Flux reactor trip (and rod stop).

The LCO requires four channels of Power Range Neutron Flux, P-10 interlock to be OPERABLE in MODE 1 or 2.

OPERABILITY in MODE 1 ensures the Function is available to perform its decreasing power Functions in the event of a reactor shutdown. This Function must be OPERABLE in MODE 2 to ensure that core protection is provided during a startup or shutdown by the Power Range Neutron Flux-Low and

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

Intermediate Range Neutron Flux reactor trips. In MODE 3, 4, 5, or 6, this Function does not have to be OPERABLE because the reactor is not at power and the Source Range Neutron Flux reactor trip provides core protection.

e. Turbine Inlet Pressure, P-13

The Turbine Inlet Pressure, P-13 interlock is actuated when the pressure at the inlet to the high pressure turbine is greater than a pressure equivalent to approximately 10% of the rated full power pressure. This is determined by one-out-of-two pressure detectors. The LCO requirement for this Function ensures that one of the inputs to the P-7 interlock is available.

The LCO requires two channels of Turbine Inlet Pressure, P-13 interlock to be OPERABLE in MODE 1.

The Turbine Inlet Pressure, P-13 interlock must be OPERABLE when the turbine generator is operating. The interlock Function is not required OPERABLE in MODE 2, 3, 4, 5, or 6 because the turbine generator is not operating.

Note: The terms Turbine Impulse Chamber Pressure, Turbine Inlet Pressure, Turbine Impulse Pressure, and First Stage Pressure are functionally equivalent.

17. Reactor Trip Breakers

This trip Function applies to the RTBs exclusive of individual trip mechanisms. The LCO requires two OPERABLE trains of trip breakers. A trip breaker train consists of all trip breakers associated with a single RTS logic train that are racked in, closed, and capable of supplying power to the CRD System. Thus, the train may consist of the main breaker, bypass breaker, or main breaker and bypass breaker, depending upon the system configuration. Two OPERABLE trains ensure no single random failure can disable the RTS trip capability.

These trip Functions must be OPERABLE in MODE 1 or 2 when the reactor is critical. In MODE 3, 4, or 5, these RTS trip Functions must be OPERABLE when the RTBs or associated bypass breakers are closed, and the CRD System is capable of rod withdrawal.

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

18. Reactor Trip Breaker Undervoltage and Shunt Trip Mechanisms

The LCO requires both the Undervoltage and Shunt Trip Mechanisms to be OPERABLE for each RTB that is in service. The trip mechanisms are not required to be OPERABLE for trip breakers that are open, racked out, incapable of supplying power to the CRD System, or declared inoperable under Function 17 above.

OPERABILITY of both trip mechanisms on each breaker ensures that no single trip mechanism failure will prevent opening any breaker on a valid signal.

These trip Functions must be OPERABLE in MODE 1 or 2 when the reactor is critical. In MODE 3, 4, or 5, these RTS trip Functions must be OPERABLE when the RTBs or associated bypass breakers are closed, and the CRD System is capable of rod withdrawal.

19. Automatic Trip Logic

The LCO requirement for the RTBs (Functions 17 and 18) and Automatic Trip Logic (Function 19) ensures that means are provided to interrupt the power to allow the rods to fall into the reactor core. Each RTB is equipped with an undervoltage coil and a shunt trip coil to trip the breaker open when needed. Each train RTB has a bypass breaker to allow testing of the trip breaker while the unit is at power. The reactor trip signals generated by the RTS Automatic Trip Logic cause the RTBs and associated bypass breakers to open and shut down the reactor.

The LCO requires two trains of RTS Automatic Trip Logic to be OPERABLE. Having two OPERABLE channels ensures that random failure of a single logic channel will not prevent reactor trip.

These trip Functions must be OPERABLE in MODE 1 or 2 when the reactor is critical. In MODE 3, 4, or 5, these RTS trip Functions must be OPERABLE when the RTBs and associated bypass breakers are closed, and the CRD System is capable of rod withdrawal.

The RTS instrumentation satisfies Criterion 3 of 10 CFR 50.36 (Ref. 6).

ACTIONS

A Note has been added to the ACTIONS to clarify the application of Completion Time rules. The Conditions of this Specification may be entered independently for each Function listed in Table 3.3.1-1. When the Required Channels in Table 3.3.1-1 are specified (e.g., on a per steam line, per loop,

BASES

ACTIONS (continued)

per SG, etc., basis), then the Condition may be entered separately for each steam line, loop, SG, etc., as appropriate.

A channel shall be OPERABLE if the point at which the channel trips is found equal to or more conservative than the Allowable Value. In the event a channel's trip setpoint is found less conservative than the Allowable Value, or the transmitter, instrument loop, signal processing electronics, or bistable is found inoperable, then all affected Functions provided by that channel must be declared inoperable and the LCO Condition(s) entered for the protection Function(s) affected. Unless otherwise specified, if plant conditions warrant, the trip setpoint may be set outside the NOMINAL TRIP SETPOINT calibration tolerance band as long as the trip setpoint is conservative with respect to the NOMINAL TRIP SETPOINTS. If the trip setpoint is found outside the NOMINAL TRIP SETPOINT calibration tolerance band and non-conservative with respect to the NOMINAL TRIP SETPOINT, the setpoint shall be re-adjusted.

When the number of inoperable channels in a trip Function exceed those specified in one or other related Conditions associated with a trip Function, then the unit is outside the safety analysis. Therefore, LCO 3.0.3 must be immediately entered if applicable in the current MODE of operation.

A.1

Condition A applies to all RTS protection Functions. Condition A addresses the situation where one or more required channels for one or more Functions are inoperable at the same time. The Required Action is to refer to Table 3.3.1-1 and to take the Required Actions for the protection functions affected. The Completion Times are those from the referenced Conditions and Required Actions.

B.1 and B.2

Condition B applies to the Manual Reactor Trip in MODE 1 or 2. This action addresses the train orientation of the SSPS for this Function. With one channel inoperable, the inoperable channel must be restored to OPERABLE status within 48 hours. In this Condition, the remaining OPERABLE channel is adequate to perform the safety function.

The Completion Time of 48 hours is reasonable considering that there are two automatic actuation trains and another manual initiation channel OPERABLE, and the low probability of an event occurring during this interval.

If the Manual Reactor Trip Function cannot be restored to OPERABLE status within the allowed 48 hour Completion Time, the unit must be brought to a

BASES

ACTIONS (continued)

MODE in which the requirement does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 additional hours (54 hours total time). The 6 additional hours are reasonable, based on operating experience, to reach MODE 3 from full power operation in an orderly manner and without challenging unit systems. With the unit in MODE 3, the MODES 1 and 2 requirements for this trip Function are no longer required and Condition C is entered.

C.1 and C.2

Condition C applies to the following reactor trip Functions in MODE 3, 4, or 5 with the RTBs closed and the CRD System capable of rod withdrawal:

- Manual Reactor Trip;
- RTBs;
- RTB Undervoltage and Shunt Trip Mechanisms; and
- Automatic Trip Logic.

This action addresses the train orientation of the SSPS for these Functions. With one channel or train inoperable, the inoperable channel or train must be restored to OPERABLE status within 48 hours. If the affected Function(s) cannot be restored to OPERABLE status within the allowed 48 hour Completion Time, the unit must be placed in a condition in which the requirement does not apply. To achieve this status, the RTBs must be opened within the next hour. The additional hour provides sufficient time to accomplish the action in an orderly manner. With the RTBs open, these Functions are no longer required.

The Completion Time is reasonable considering that in this Condition, the remaining OPERABLE train is adequate to perform the safety function, and given the low probability of an event occurring during this interval.

D.1.1, D.1.2, and D.2

Condition D applies to the Power Range Neutron Flux—High and Power Range Neutron Flux-High Positive Rate Functions.

The NIS power range detectors provide input to the CRD System and the SG Water Level Control System and, therefore, have a two-out-of-four trip logic. A known inoperable channel must be placed in the tripped condition. This results in a partial trip condition requiring only one-out-of-three logic for actuation. The 72 hours allowed to place the inoperable channel in the tripped condition is justified in WCAP-14333-P-A (Ref. 10).

BASES

ACTIONS (continued)

With one of the NIS power range detectors inoperable, 1/4 of the radial power distribution monitoring capability is lost. Therefore, SR 3.2.4.2 must be performed (Required Action D.1.1) within 12 hours of THERMAL POWER exceeding 75% RTP and once per 12 hours thereafter. Calculating QPTR every 12 hours compensates for the lost monitoring capability due to the inoperable NIS power range channel and allows continued unit operation at power levels > 75% RTP. At power levels \leq 75% RTP, operation of the core with radial power distributions beyond the design limits, at a power level where DNB conditions may exist, is prevented. The 12 hour Completion Time is consistent with the surveillance Requirement Frequency in LCO 3.2.4, "QUADRANT POWER TILT RATIO (QPTR)." Required Action D.1.1 has been modified by a Note which only requires SR 3.2.4.2 to be performed if the Power Range Neutron Flux input to QPTR becomes inoperable. Failure of a component in the Power Range Neutron Flux Channel which renders the High Flux Trip Function inoperable may not affect the capability to monitor QPTR. As such, determining QPTR using movable incore detectors may not be necessary.

As an alternative to the above Actions, the plant must be placed in a MODE where this Function is no longer required OPERABLE. Seventy eight (78) hours are allowed to place the plant in MODE 3. The 78 hour completion time includes 72 hours for channel corrective maintenance and an additional 6 hours for the MODE reduction as required by Required Action D.2. This is a reasonable time, based on operating experience, to reach MODE 3 from full power in an orderly manner and without challenging plant systems. If Required Actions cannot be completed within their allowed Completion Times, LCO 3.0.3 must be entered.

The Required Actions have been modified by a Note that allows placing the inoperable channel in the bypass condition for up to 12 hours while performing routine surveillance testing of other channels. The Note also allows placing the inoperable channel in the bypass condition to allow setpoint adjustments of other channels when required to reduce the setpoint in accordance with other Technical Specifications. The note also allows an OPERABLE channel to be placed in bypass for up to 12 hours for testing of the bypassed channel. However, only one channel may be placed in bypass at any one time. The 12 hour time limit is justified in Reference 10.

BASES

ACTIONS (continued)

E.1 and E.2

Condition E applies to the following reactor trip Functions:

- Power Range Neutron Flux—Low;
- Overtemperature ΔT ;
- Overpower ΔT ;
- Pressurizer Pressure—High; and
- SG Water Level—Low Low.

A known inoperable channel must be placed in the tripped condition within 72 hours. Placing the channel in the tripped condition results in a partial trip condition requiring only one-out-of-three logic for actuation of the two-out-of-four trips. The 72 hours allowed to place the inoperable channel in the tripped condition is justified in Reference 10.

If the operable channel cannot be placed in the trip condition within the specified Completion Time, the unit must be placed in a MODE where these Functions are not required OPERABLE. An additional 6 hours is allowed to place the unit in MODE 3. Six hours is a reasonable time, based on operating experience, to place the unit in MODE 3 from full power in an orderly manner and without challenging unit systems.

The Required Actions have been modified by a Note that allows placing the inoperable channel in the bypassed condition for up to 12 hours while performing routine surveillance testing of the other channels. The note also allows an OPERABLE channel to be placed in bypass for up to 12 hours for testing of the bypassed channel. However, only one channel may be placed in bypass at any one time. The 12 hour time limit is justified in Reference 10.

F.1 and F.2

Condition F applies to the Intermediate Range Neutron Flux trip when THERMAL POWER is above the P-6 setpoint and below the P-10 setpoint and one channel is inoperable. Above the P-6 setpoint and below the P-10 setpoint, the NIS intermediate range detector performs the monitoring Functions. If THERMAL POWER is greater than the P-6 setpoint but less than the P-10 setpoint, 24 hours is allowed to reduce THERMAL POWER below the P-6 setpoint or increase to THERMAL POWER above the P-10 setpoint. The NIS Intermediate Range Neutron Flux channels must be OPERABLE when the power level is above the capability of the source range, P-6, and below the capability of the power range, P-10. If THERMAL POWER is greater than the

BASES

ACTIONS (continued)

P-10 setpoint, the NIS power range detectors perform the monitoring and protection functions and the intermediate range is not required. The Completion Times allow for a slow and controlled power adjustment above P-10 or below P-6 and take into account the redundant capability afforded by the redundant OPERABLE channel, and the low probability of its failure during this period. This action does not require the inoperable channel to be tripped because the Function uses one-out-of-two logic. Tripping one channel would trip the reactor. Thus, the Required Actions specified in this Condition are only applicable when channel failure does not result in reactor trip.

G.1 and G.2

Condition G applies to two inoperable Intermediate Range Neutron Flux trip channels in MODE 2 when THERMAL POWER is above the P-6 setpoint and below the P-10 setpoint. Required Actions specified in this Condition are only applicable when channel failures do not result in reactor trip. Above the P-6 setpoint and below the P-10 setpoint, the NIS intermediate range detector performs the monitoring Functions. With no intermediate range channels OPERABLE, the Required Actions are to suspend operations involving positive reactivity additions immediately. This will preclude any power level increase since there are no OPERABLE Intermediate Range Neutron Flux channels. The operator must also reduce THERMAL POWER below the P-6 setpoint within two hours. Below P-6, the Source Range Neutron Flux channels will be able to monitor the core power level. The Completion Time of 2 hours will allow a slow and controlled power reduction to less than the P-6 setpoint and takes into account the low probability of occurrence of an event during this period that may require the protection afforded by the NIS Intermediate Range Neutron Flux trip. Required Action G.1 is modified by a note to indicate that normal plant control operations that individually add limited positive reactivity (e.g., temperature or boron fluctuations associated with RCS inventory management or temperature control) are not precluded by this Action.

H.1

Condition H applies to the Intermediate Range Neutron Flux trip when THERMAL POWER is below the P-6 setpoint and one or two channels are inoperable. Below the P-6 setpoint, the NIS source range performs the monitoring and protection functions. The inoperable NIS intermediate range channel(s) must be returned to OPERABLE status prior to increasing power above the P-6 setpoint. The NIS intermediate range channels must be OPERABLE when the power level is above the capability of the source range, P-6, and below the capability of the power range, P-10.

BASES

ACTIONS (continued)

I.1

Condition I applies to one inoperable Source Range Neutron Flux trip channel when in MODE 2, below the P-6 setpoint, and performing a reactor startup. With the unit in this Condition, below P-6, the NIS source range performs the monitoring and protection functions. With one of the two channels inoperable, operations involving positive reactivity additions shall be suspended immediately.

This will preclude any power escalation. With only one source range channel OPERABLE, core protection is severely reduced and any actions that add positive reactivity to the core must be suspended immediately.

Required Action I.1 is modified by a note to indicate that normal plant control operations that individually add limited positive reactivity (e.g., temperature or boron fluctuations associated with RCS inventory management or temperature control) are not precluded by this Action.

J.1

Condition J applies to two inoperable Source Range Neutron Flux trip channels when in MODE 2, below the P-6 setpoint, and performing a reactor startup, or in MODE 3, 4, or 5 with the RTBs closed and the CRD System capable of rod withdrawal. With the unit in this Condition, below P-6, the NIS source range performs the monitoring and protection functions. With both source range channels inoperable, the RTBs must be opened immediately. With the RTBs open, the core is in a more stable condition and the unit enters Condition L.

K.1 and K.2

Condition K applies to one inoperable source range channel in MODE 3, 4, or 5 with the RTBs closed and the CRD System capable of rod withdrawal. With the unit in this Condition, below P-6, the NIS source range performs the monitoring and protection functions. With one of the source range channels inoperable, 48 hours is allowed to restore it to an OPERABLE status. If the channel cannot be returned to an OPERABLE status, 1 additional hour is allowed to open the RTBs. Once the RTBs are open, the core is in a more stable condition and the unit enters Condition L. The allowance of 48 hours to restore the channel to OPERABLE status, and the additional hour to open the RTBs, are justified in Reference 7.

L.1, L.2, and L.3

Condition L applies when the required number of OPERABLE Source Range Neutron Flux channels is not met in MODE 3, 4, or 5 with the RTBs open.

BASES

ACTIONS (continued)

With the unit in this Condition, the NIS source range performs a monitoring function. With less than the required number of source range channels OPERABLE, operations involving positive reactivity additions shall be suspended immediately. In addition to suspension of positive reactivity additions, all valves that could add unborated water to the RCS must be closed within 1 hour as specified in LCO 3.9.2. The isolation of unborated water sources will preclude a boron dilution accident.

Also, the SDM must be verified within 1 hour and once every 12 hours thereafter as per SR 3.1.1.1, SDM verification. With no source range channels OPERABLE, core monitoring is severely reduced. Verifying the SDM within 1 hour allows sufficient time to perform the calculations and determine that the SDM requirements are met. The SDM must also be verified once per 12 hours thereafter to ensure that the core reactivity has not changed. Required Action L.1 precludes any positive reactivity additions; therefore, core reactivity should not be increasing, and a 12 hour Frequency is adequate. The Completion Times of within 1 hour and once per 12 hours are based on operating experience in performing the Required Actions and the knowledge that unit conditions will change slowly. Required Action L.1 is modified by a note which permits plant temperature changes provided the temperature change is accounted for in the calculated SDM and that K_{eff} remains < 0.99 . Introduction of temperature changes including temperature increases when a positive MTC exists, must be evaluated to ensure they do not result in a loss of required SDM or adequate margin to criticality.

M.1 and M.2

Condition M applies to the following reactor trip Functions:

- Pressurizer Pressure—Low;
- Pressurizer Water Level—High;
- Reactor Coolant Flow—Low (Two Loops);
- Undervoltage RCPs; and
- Underfrequency RCPs.

With one channel inoperable, the inoperable channel must be placed in the tripped condition within 72 hours. Placing the channel in the tripped condition results in a partial trip condition requiring only one additional channel to initiate a reactor trip above the P-7 setpoint (and below the P-8 setpoint for the

BASES

ACTIONS (continued)

Reactor Coolant Flow-Low (Two Loops) Function). These Functions do not have to be OPERABLE below the P-7 setpoint because, for the Pressurizer Water Level-High function, transients are slow enough for manual action; and for the other functions, power distributions that would cause a DNB concern at this low power level are unlikely. The 72 hours allowed to place the channel in the tripped condition is justified in Reference 10. An additional 6 hours is allowed to reduce THERMAL POWER to below P-7 if the inoperable channel cannot be restored to OPERABLE status or placed in trip within the specified Completion Time.

Allowance of this time interval takes into consideration the redundant capability provided by the remaining redundant OPERABLE channel, and the low probability of occurrence of an event during this period that may require the protection afforded by the Functions associated with Condition M.

The Required Actions have been modified by a Note that allows placing the inoperable channel in the bypassed condition for up to 12 hours while performing routine surveillance testing of the other channels. The note also allows an OPERABLE channel to be placed in bypass for up to 12 hours for testing of the bypassed channel. However, only one channel may be placed in bypass at any one time. The 12 hour time limit is justified in Reference 10.

N.1 and N.2

Condition N applies to the Reactor Coolant Flow—Low (Single Loop) reactor trip Function. With one channel inoperable, the inoperable channel must be placed in trip within 72 hours. If the channel cannot be restored to OPERABLE status or the channel placed in trip within the 72 hours, then THERMAL POWER must be reduced below the P-8 setpoint within the next 4 hours. This places the unit in a MODE where the LCO is no longer applicable. This trip Function does not have to be OPERABLE below the P-8 setpoint because other RTS trip Functions provide core protection below the P-8 setpoint. The 72 hours allowed to restore the channel to OPERABLE status or place in trip and the 4 additional hours allowed to reduce THERMAL POWER to below the P-8 setpoint are justified in Reference 10.

The Required Actions have been modified by a Note that allows placing the inoperable channel in the bypassed condition for up to 12 hours while performing routine surveillance testing of the other channels. The note also allows an OPERABLE channel to be placed in bypass for up to 12 hours for testing of the bypassed channel. However, only one channel may be placed in bypass at any one time. The 12 hour time limit is justified in Reference 10.

BASES

ACTIONS (continued)

O.1, O.2, P.1, and P.2

Condition O and P apply to Turbine Trip on Low Fluid Oil Pressure or on Turbine Stop Valve Closure. With a channel inoperable, the inoperable channel must be placed in the trip condition within 72 hours. If placed in the tripped condition, this results in a partial trip condition requiring fewer additional channel to initiate a reactor trip. If the channel cannot be restored to OPERABLE status or placed in the trip condition, then power must be reduced below the P-8 setpoint within the next 4 hours. The 72 hours allowed to place the inoperable channel in the tripped condition and the 4 hours allowed for reducing power are justified in Reference 10.

The Required Actions of Condition O have been modified by a Note that allows placing the inoperable channel in the bypassed condition for up to 12 hours while performing routine surveillance testing of the other channels. The note also allows an OPERABLE channel to be placed in bypass for up to 12 hours for testing of the bypassed channel. However, only one channel may be placed in bypass at any one time. The 12 hour time limit is justified in Reference 10.

Q.1 and Q.2

Condition Q applies to the SI Input from ESFAS reactor trip and the RTS Automatic Trip Logic in MODES 1 and 2. These actions address the train orientation of the RTS for these Functions. With one train inoperable, 24 hours are allowed to restore the train to OPERABLE status (Required Action Q.1) or the unit must be placed in MODE 3 within the next 6 hours. The Completion Time of 24 hours (Required Action Q.1) is reasonable considering that in this Condition, the remaining OPERABLE train is adequate to perform the safety function and given the low probability of an event during this interval. The 24 hours allowed to restore the inoperable RTS Automatic Trip Logic train to OPERABLE status is justified in Reference 10. The additional Completion Time of 6 hours (Required Action Q.2) is reasonable, based on operating experience, to reach MODE 3 from full power in an orderly manner and without challenging unit systems.

The Required Actions have been modified by a Note that allows bypassing one train up to 4 hours for surveillance testing, provided the other train is OPERABLE. The 4 hour time limit for testing the RTS Automatic Trip Logic train may include testing the RTB also, if both the Logic test and RTB test are conducted within the 4 hour time limit. The 4 hour time limit is justified in Reference 10.

BASES

ACTIONS (continued)

R.1 and R.2

Condition R applies to the RTBs in MODES 1 and 2. These actions address the train orientation of the RTS for the RTBs. With one train inoperable, 24 hours is allowed for train corrective maintenance to restore the train to OPERABLE status or the unit must be placed in MODE 3 within the next 6 hours. The 24 hour Completion Time is justified in Reference 11. The Completion Time of 6 hours is reasonable, based on operating experience, to reach MODE 3 from full power in an orderly manner and without challenging unit systems. Placing the unit in MODE 3 removes the requirement for this particular Function.

The Required Actions have been modified by a Note. The Note allows one RTB to be bypassed for up to 4 hours for surveillance testing, provided the other RTB is OPERABLE. The 4 hour time limit is justified in Reference 11.

S.1 and S.2

Condition S applies to the P-6 and P-10 interlocks. With one or more channel(s) inoperable for one-out-of-two or two-out-of-four coincidence logic, the associated interlock must be verified to be in its required state for the existing unit condition within 1 hour or the unit must be placed in MODE 3 within the next 6 hours. Verifying the interlock status, by visual observation of the control room status lights, manually accomplishes the interlock's Function. The Completion Time of 1 hour is based on operating experience and the minimum amount of time allowed for manual operator actions. The Completion Time of 6 hours is reasonable, based on operating experience, to reach MODE 3 from full power in an orderly manner and without challenging unit systems. The 1 hour and 6 hour Completion Times are equal to the time allowed by LCO 3.0.3 for shutdown actions in the event of a complete loss of RTS Function.

T.1 and T.2

Condition T applies to the P-7, P-8, and P-13 interlocks. With one or more channel(s) inoperable for one-out-of-two or two-out-of-four coincidence logic, the associated interlock must be verified to be in its required state for the existing unit condition within 1 hour or the unit must be placed in MODE 2 within the next 6 hours. These actions are conservative for the case where power level is being raised. Verifying the interlock status, by visual observation of the control room status lights, manually accomplishes the interlock's Function. The Completion Time of 1 hour is based on operating experience and the minimum amount of time allowed for manual operator actions. The Completion Time of 6 hours is reasonable, based on operating experience, to reach MODE 2 from full power in an orderly manner and without challenging unit systems.

BASES

ACTIONS (continued)

U.1 and U.2

Condition U applies to the RTB Undervoltage and Shunt Trip Mechanisms, or diverse trip features, in MODES 1 and 2. With one of the diverse trip features inoperable, it must be restored to an OPERABLE status within 48 hours or the unit must be placed in a MODE where the requirement does not apply. This is accomplished by placing the unit in MODE 3 within the next 6 hours (54 hours total time). With both diverse trip features inoperable, the reactor trip breaker is inoperable and Condition R is entered. The Completion Time of 6 hours is a reasonable time, based on operating experience, to reach MODE 3 from full power in an orderly manner and without challenging unit systems.

With the unit in MODE 3, the MODES 1 and 2 requirement for this function is no longer required and Condition C is entered. The affected RTB shall not be bypassed while one of the diverse features is inoperable except for the time required to perform maintenance to one of the diverse features. The allowable time for performing maintenance of the diverse features is 2 hours for the reasons stated under Condition R.

The Completion Time of 48 hours for Required Action U.1 is reasonable considering that in this Condition there is one remaining diverse feature for the affected RTB, and one OPERABLE RTB capable of performing the safety function and given the low probability of an event occurring during this interval.

V.1

With two RTS trains inoperable, no automatic capability is available to shut down the reactor, and immediate plant shutdown in accordance with LCO 3.0.3 is required.

**SURVEILLANCE
REQUIREMENTS**

The SRs for each RTS Function are identified by the SRs column of Table 3.3.1-1 for that Function.

A Note has been added to the SR Table stating that Table 3.3.1-1 determines which SRs apply to which RTS Functions.

Note that each channel of process protection supplies both trains of the RTS. When testing Channel I, Train A and Train B must be examined. Similarly, Train A and Train B must be examined when testing Channel II, Channel III, and Channel IV (if applicable). The CHANNEL CALIBRATION and COTs are performed in a manner that is consistent with the assumptions used in analytically calculating the required channel accuracies.

BASES

SURVEILLANCE REQUIREMENTS (continued)

Performing the Neutron Flux Instrumentation surveillances meets the License Renewal Commitments for License Renewal Program for Neutron Flux Instrumentation Circuits per UFSAR Chapter 18, Table 18-1 and License Renewal Commitments Specification MCS-1274.00-00-0016, Section 4.44.

SR 3.3.1.1

Performance of the CHANNEL CHECK ensures that gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between instrument channels could be an indication of excessive instrument drift in one of the channels or of something even more serious. A CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying that the instrumentation continues to operate properly between each CHANNEL CALIBRATION.

Agreement criteria are determined by the unit staff based on a combination of the channel instrument uncertainties, including indication and readability. If a channel is outside the criteria, it may be an indication that the sensor or the signal processing equipment has drifted outside its limit.

The Surveillance Frequency is based on operating experience, equipment reliability, and plant risk and is controlled under the Surveillance Frequency Control Program.

SR 3.3.1.2

SR 3.3.1.2 compares the calorimetric heat balance calculation to the NIS channel output. If the calorimetric exceeds the NIS channel output by $> 2\%$ RTP, the NIS is not declared inoperable, but must be adjusted. If the NIS channel output cannot be properly adjusted, the channel is declared inoperable.

Two Notes modify SR 3.3.1.2. The first Note indicates that the NIS channel output shall be adjusted consistent with the calorimetric results if the absolute difference between the NIS channel output and the calorimetric is $> 2\%$ RTP. The second Note clarifies that this Surveillance is required only if reactor power is $\geq 15\%$ RTP and that 12 hours is allowed for completing the first Surveillance after reaching 15% RTP. At lower power levels, calorimetric data are inaccurate.

BASES

SURVEILLANCE REQUIREMENTS (continued)

The Surveillance Frequency is based on operating experience, equipment reliability, and plant risk and is controlled under the Surveillance Frequency Control Program.

SR 3.3.1.3

SR 3.3.1.3 compares the incore system to the NIS channel output. If the absolute difference in AFD is $\geq 3\%$, the NIS channel is still OPERABLE, but must be readjusted.

If the NIS channel cannot be properly readjusted, the channel is declared inoperable. This Surveillance is performed to verify the $f(\Delta I)$ input to the overtemperature ΔT Function and overpower ΔT Function.

Two Notes modify SR 3.3.1.3. Note 1 indicates that the excore NIS channel shall be adjusted if the absolute difference between the incore and excore AFD is $\geq 3\%$. Note 2 clarifies that the Surveillance is required only if reactor power is $\geq 15\%$ RTP and that 24 hours is allowed for completing the first Surveillance after reaching 15% RTP.

The Surveillance Frequency is based on operating experience, equipment reliability, and plant risk and is controlled under the Surveillance Frequency Control Program.

SR 3.3.1.4

SR 3.3.1.4 is the performance of a TADOT. This test shall verify OPERABILITY by actuation of the end devices.

The RTB test shall include separate verification of the undervoltage and shunt trip mechanisms. Independent verification of RTB undervoltage and shunt trip Function is not required for the bypass breakers. No capability is provided for performing such a test at power. The independent test for bypass breakers is included in SR 3.3.1.14. The bypass breaker test shall include a local shunt trip. A Note has been added to indicate that this test must be performed on the bypass breaker prior to placing it in service.

The Surveillance Frequency is based on operating experience, equipment reliability, and plant risk and is controlled under the Surveillance Frequency Control Program.

SR 3.3.1.5

SR 3.3.1.5 is the performance of an ACTUATION LOGIC TEST. The SSPS is tested using the semiautomatic tester. The train being tested is placed in the

BASES

SURVEILLANCE REQUIREMENTS (continued)

bypass condition, thus preventing inadvertent actuation. Through the semiautomatic tester, all possible logic combinations, with and without applicable permissives, are tested for each protection function. The Surveillance Frequency is based on operating experience, equipment reliability, and plant risk and is controlled under the Surveillance Frequency Control Program.

SR 3.3.1.6

SR 3.3.1.6 is a calibration of the excore channels to the incore channels. If the measurements do not agree, the excore channels are not declared inoperable but must be calibrated to agree with the incore detector measurements. If the excore channels cannot be adjusted, the channels are declared inoperable. This Surveillance is performed to verify the $f(\Delta I)$ input to the overtemperature ΔT Function and overpower ΔT Function.

At Beginning of Cycle (BOC), the excore channels are compared to the incore detector measurements. This comparison is typically performed prior to exceeding 75% power. Excore detectors are adjusted as necessary. This low power surveillance satisfies the initial performance of SR 3.3.1.6.

At BOC, after reaching full power steady state conditions, additional incore and excore measurements are taken and excore detectors are adjusted as necessary.

The M factors are normally only determined at BOC, but they may be changed at other points in the fuel cycle if the relationship between excore and incore measurements changes significantly.

A Note modifies SR 3.3.1.6. The Note states that this Surveillance is required only if reactor power is $\geq 75\%$ RTP and that 24 hours is allowed for completing the first surveillance after reaching 75% RTP.

The Surveillance Frequency is based on operating experience, equipment reliability, and plant risk and is controlled under the Surveillance Frequency Control Program.

SR 3.3.1.7

SR 3.3.1.7 is the performance of a COT.

A COT is performed on each required channel to ensure the channel will perform the intended Function.

BASES

SURVEILLANCE REQUIREMENTS (continued)

The tested portion of the Loop must trip within the Allowable Values specified in Table 3.3.1-1.

The setpoint shall be left set consistent with the assumptions of the setpoint methodology.

SR 3.3.1.7 is modified by a Note that provides a 4 hour delay in the requirement to perform this Surveillance for source range instrumentation when entering MODE 3 from MODE 2. This Note allows a normal shutdown to proceed without a delay for testing in MODE 2 and for a short time in MODE 3 until the RTBs are open and SR 3.3.1.7 is no longer required to be performed. If the unit is to be in MODE 3 with the RTBs closed for > 4 hours this Surveillance must be completed within 4 hours after entry into MODE 3.

The Surveillance Frequency is based on operating experience, equipment reliability, and plant risk and is controlled under the Surveillance Frequency Control Program.

For Functions for which TSTF-493, "Clarify Application of Setpoint Methodology for LSSS Functions" (Reference 12) has been implemented, this SR is modified by two Notes as identified in Table 3.3.1-1. The first Note requires evaluation of channel performance for the condition where the as-found setting for the channel setpoint is outside its as-found tolerance but conservative with respect to the Allowable Value. Evaluation of channel performance will verify that the channel will continue to behave in accordance with safety analysis assumptions and the channel performance assumptions in the setpoint methodology. The purpose of the assessment is to ensure confidence in the channel performance prior to returning the channel to service. The performance of these channels will be evaluated under the station's Corrective Action Program. Entry into the Corrective Action Program will ensure required review and documentation of the condition for continued OPERABILITY. The second Note requires that the as-left setting for the channel be returned to within the as-left tolerance of the Nominal Trip Setpoint (NTSP). Where a setpoint more conservative than the NTSP is used in the plant surveillance procedures (field setting), the as-left and as-found tolerances, as applicable, will be applied to the surveillance procedure setpoint. This will ensure that sufficient margin to the Safety Limit and/or Analytical Limit is maintained. If the as-left channel setting cannot be returned to a setting within the as-left tolerance of the NTSP, then the channel shall be declared inoperable. The second Note also requires that the methodologies for calculating the as-left and the as-found tolerances be in the UFSAR. The NOMINAL TRIP SETPOINT definition includes a provision that would allow the as-left setting for the channel to be outside the tolerance band, provided the setting is conservative with respect to the NTSP.

BASES

SURVEILLANCE REQUIREMENTS (continued)

This provision is not applicable to Functions for which the second NOTE applies.

SR 3.3.1.8

SR 3.3.1.8 is the performance of a COT as described in SR 3.3.1.7, except it is modified by a Note that this test shall include verification that the P-6, during the Intermediate Range COT, and P-10, during the Power Range COT, interlocks are in their required state for the existing unit condition. The verification is performed by visual observation of the permissive status light in the unit control room. The Frequency is modified by a Note that allows this surveillance to be satisfied if it has been performed within the frequency specified in the Surveillance Frequency Control Program or 184 days of the Frequencies prior to reactor startup and four hours after reducing power below P-10 and P-6. The Frequency of "prior to startup" ensures this surveillance is performed prior to critical operations and applies to the source, intermediate and power range low instrument channels. The Frequency of "4 hours after reducing power below P-10" (applicable to intermediate and power range low channels) and "4 hours after reducing power below P-6" (applicable to source range channels) allows a normal shutdown to be completed and the unit removed from the MODE of Applicability for this surveillance without a delay to perform the testing required by this surveillance. The Frequency thereafter applies if the plant remains in the MODE of Applicability after the initial performances of prior to reactor startup and four hours after reducing power below P-10 or P-6. The MODE of Applicability for this surveillance is < P-10 for the power range low and intermediate range channels and < P-6 for the source range channels. Once the unit is in MODE 3, this surveillance is no longer required. If power is to be maintained < P-10 or < P-6 for more than 4 hours, then the testing required by this surveillance must be performed prior to the expiration of the 4 hour limit. Four hours is a reasonable time to complete the required testing or place the unit in a MODE where this surveillance is no longer required. This test ensures that the NIS source, intermediate, and power range low channels are OPERABLE prior to taking the reactor critical and after reducing power into the applicable MODE (< P-10 or < P-6) for periods > 4 hours.

The Surveillance Frequency is based on operating experience, equipment reliability, and plant risk and is controlled under the Surveillance Frequency Control Program.

For Functions for which TSTF-493, "Clarify Application of Setpoint Methodology for LSSS Functions" (Reference 12) has been implemented, this SR is modified by two Notes as identified in Table 3.3.1-1. The first Note requires evaluation of channel performance for the condition where the as-found setting for the channel setpoint is outside its as-found tolerance but

BASES

SURVEILLANCE REQUIREMENTS (continued)

conservative with respect to the Allowable Value. Evaluation of channel performance will verify that the channel will continue to behave in accordance with safety analysis assumptions and the channel performance assumptions in the setpoint methodology. The purpose of the assessment is to ensure confidence in the channel performance prior to returning the channel to service. The performance of these channels will be evaluated under the station's Corrective Action Program. Entry into the Corrective Action Program will ensure required review and documentation of the condition for continued OPERABILITY. The second Note requires that the as-left setting for the channel be returned to within the as-left tolerance of the Nominal Trip Setpoint (NTSP). Where a setpoint more conservative than the NTSP is used in the plant surveillance procedures (field setting), the as-left and as-found tolerances, as applicable, will be applied to the surveillance procedure setpoint. This will ensure that sufficient margin to the Safety Limit and/or Analytical Limit is maintained. If the as-left channel setting cannot be returned to a setting within the as-left tolerance of the NTSP, then the channel shall be declared inoperable. The second Note also requires that the methodologies for calculating the as-left and the as-found tolerances be in the UFSAR. The NOMINAL TRIP SETPOINT definition includes a provision that would allow the as-left setting for the channel to be outside the tolerance band, provided the setting is conservative with respect to the NTSP. This provision is not applicable to Functions for which the second NOTE applies.

SR 3.3.1.9

SR 3.3.1.9 is the performance of a TADOT. The Surveillance Frequency is based on operating experience, equipment reliability, and plant risk and is controlled under the Surveillance Frequency Control Program.

The SR is modified by a Note that excludes verification of setpoints from the TADOT. Since this SR applies to RCP undervoltage and underfrequency relays, setpoint verification is accomplished during the CHANNEL CALIBRATION.

SR 3.3.1.10

The CHANNEL CALIBRATION may be performed at power or during refueling based on testing capability. Channel unavailability evaluations in References 10 and 11 have conservatively assumed that the CHANNEL CALIBRAITON is performed at power with the channel in bypass.

BASES

SURVEILLANCE REQUIREMENTS (continued)

CHANNEL CALIBRATION is a complete check of the instrument loop, including the sensor. The test verifies that the channel responds to a measured parameter within the necessary range and accuracy.

CHANNEL CALIBRATIONS must be performed consistent with the assumptions of the setpoint methodology.

The Surveillance Frequency is based on operating experience, equipment reliability, and plant risk and is controlled under the Surveillance Frequency Control Program.

SR 3.3.1.10 is modified by a Note stating that this test shall include verification that the time constants are adjusted to the prescribed values where applicable. The applicable time constants are shown in Table 3.3.1-1.

SR 3.3.1.11

SR 3.3.1.11 is the performance of a CHANNEL CALIBRATION, as described in SR 3.3.1.10. Two notes modify this SR. Note 1 states that neutron detectors are excluded from the CHANNEL CALIBRATION. The CHANNEL CALIBRATION for the power range neutron detectors consists of a normalization of the detectors based on a power calorimetric and flux map performed above 15% RTP.

The CHANNEL CALIBRATION for the fission chamber source and intermediate range neutron detectors consists of verifying that the channels respond correctly to test inputs with the necessary range and accuracy.

Note 2 states that this Surveillance is not required for the NIS power range detectors for entry into MODE 2 or 1. The Surveillance Frequency is based on operating experience, equipment reliability, and plant risk and is controlled under the Surveillance Frequency Control Program.

For Functions for which TSTF-493, "Clarify Application of Setpoint Methodology for LSSS Functions" (Reference 12) has been implemented, this SR is modified by two Notes as identified in Table 3.3.1-1. The first Note requires evaluation of channel performance for the condition where the as-found setting for the channel setpoint is outside its as-found tolerance but conservative with respect to the Allowable Value.

Evaluation of channel performance will verify that the channel will continue to behave in accordance with safety analysis assumptions and the channel performance assumptions in the setpoint methodology. The purpose of the assessment is to ensure confidence in the channel performance prior to returning the channel to service. The performance of these channels will be evaluated under the station's Corrective Action

BASES

SURVEILLANCE REQUIREMENTS (continued)

Program. Entry into the Corrective Action Program will ensure required review and documentation of the condition for continued OPERABILITY. The second Note requires that the as-left setting for the channel be returned to within the as-left tolerance of the Nominal Trip Setpoint (NTSP). Where a setpoint more conservative than the NTSP is used in the plant surveillance procedures (field setting), the as-left and as-found tolerances, as applicable, will be applied to the surveillance procedure setpoint. This will ensure that sufficient margin to the Safety Limit and/or Analytical Limit is maintained. If the as-left channel setting cannot be returned to a setting within the as-left tolerance of the NTSP, then the channel shall be declared inoperable. The second Note also requires that the methodologies for calculating the as-left and the as-found tolerances be in the UFSAR. The NOMINAL TRIP SETPOINT definition includes a provision that would allow the as-left setting for the channel to be outside the tolerance band, provided the setting is conservative with respect to the NTSP. This provision is not applicable to Functions for which the second NOTE applies.

SR 3.3.1.12

SR 3.3.1.12 is the performance of a CHANNEL CALIBRATION, as described in SR 3.3.1.10. Calibration of the ΔT channels is required at the beginning of each cycle upon completion of the precision heat balance. RCS loop ΔT values shall be determined by precision heat balance measurements at the beginning of each cycle.

The Surveillance Frequency is based on operating experience, equipment reliability, and plant risk and is controlled under the Surveillance Frequency Control Program.

SR 3.3.1.13

SR 3.3.1.13 is the performance of a COT of RTS interlocks.

The Surveillance Frequency is based on operating experience, equipment reliability, and plant risk and is controlled under the Surveillance Frequency Control Program.

SR 3.3.1.14

SR 3.3.1.14 is the performance of a TADOT of the Manual Reactor Trip and the SI Input from ESFAS. The test shall independently verify the OPERABILITY of the undervoltage and shunt trip mechanisms for the Manual Reactor Trip Function for the Reactor Trip Breakers and Reactor Trip Bypass Breakers. The Reactor Trip Bypass Breaker test shall include testing of the automatic undervoltage trip.

BASES

SURVEILLANCE REQUIREMENTS (continued)

The Surveillance Frequency is based on operating experience, equipment reliability, and plant risk and is controlled under the Surveillance Frequency Control Program.

The SR is modified by a Note that excludes verification of setpoints from the TADOT. The Functions affected have no setpoints associated with them.

SR 3.3.1.15

SR 3.3.1.15 is the performance of a TADOT of Turbine Trip Functions. This TADOT is as described in SR 3.3.1.4, except that this test is performed prior to reactor startup. A Note states that this Surveillance is not required if it has been performed within the previous 31 days. Verification of the Trip Setpoint does not have to be performed for this Surveillance. Performance of this test will ensure that the turbine trip Function is OPERABLE prior to taking the reactor critical. This test cannot be performed with the reactor at power and must therefore be performed prior to reactor startup.

SR 3.3.1.16 and SR 3.3.1.17

SR 3.3.1.16 and SR 3.3.1.17 verify that the individual channel/train actuation response times are less than or equal to the maximum values assumed in the accident analysis. Response time testing acceptance criteria are included in the UFSAR (Ref. 1). Individual component response times are not modeled in the analyses.

The analyses model the overall or total elapsed time, from the point at which the parameter exceeds the trip setpoint value at the sensor to the point at which the equipment reaches the required functional state (i.e., control and shutdown rods fully inserted in the reactor core).

For channels that include dynamic transfer Functions (e.g., lag, lead/lag, rate/lag, etc.), the response time test may be performed with the transfer Function set to one, with the resulting measured response time compared to the appropriate UFSAR response time. Alternately, the response time test can be performed with the time constants set to their nominal value, provided the required response time is analytically calculated assuming the time constants are set at their nominal values. The response time may be measured by a series of overlapping tests such that the entire response time is measured.

Response time may be verified by actual response time tests in any series of sequential, overlapping or total channel measurements, or by the summation of allocated sensor, signal processing and actuation logic response times with

BASES

SURVEILLANCE REQUIREMENTS (continued)

actual response time tests on the remainder of the channel. Allocations for sensor response times may be obtained from:

(1) historical records based on acceptable response time tests (hydraulic, noise, or power interrupt tests), (2) in place, onsite, or offsite (e.g., vendor) test measurements, or (3) utilizing vendor engineering specifications. WCAP-13632-P-A, Revision 2, "Elimination of Pressure Sensor Response Time Testing Requirements" provides the basis and methodology for using allocated sensor response times in the overall verification of the channel response time for specific sensors identified in the WCAP. Response time verification for other sensor types must be either demonstrated by test, or their equivalency to those listed in WCAP-13632-P-A, Revision 2. Any demonstration of equivalency must have been determined to be acceptable by NRC staff review.

WCAP-14036-P-A, Revision 1, "Elimination of Periodic Protection Channel Response Time Tests" provides the basis and methodology for using allocated signal processing and actuation logic response times in the overall verification of the protection system channel response time. The allocations for sensor, signal conditioning, and actuation logic response times must be verified prior to placing the component in operational service and re-verified following maintenance that may adversely affect response time. In general, electrical repair work does not impact response time provided the parts used for repair are of the same type and value. Specific components identified in the WCAP may be replaced without verification testing. One example where response time could be affected is replacing the sensing assembly of a transmitter.

The Surveillance Frequency is based on operating experience, equipment reliability, and plant risk and is controlled under the Surveillance Frequency Control Program.

SR 3.3.1.16 is modified by a Note stating that neutron detectors are excluded from RTS RESPONSE TIME testing. This Note is necessary because of the difficulty in generating an appropriate detector input signal. Excluding the detectors is acceptable because the principles of detector operation ensure a virtually instantaneous response. The response time of the neutron flux signal portion of the channel shall be measured from detector output or input of the first electronic component in the channel.

BASES

- REFERENCES
1. UFSAR, Chapter 7.
 2. UFSAR, Chapter 6.
 3. UFSAR, Chapter 15.
 4. IEEE-279-1971.
 5. 10 CFR 50.49.
 6. 10 CFR 50.36, Technical Specifications, (c)(2)(ii).
 7. WCAP-10271-P-A, Supplement 2, Rev. 1, June 1990.
 8. WCAP 13632-P-A, Revision 2, "Elimination of Pressure Sensor Response Time Testing Requirements" Sep., 1995.
 9. WCAP-14036-P-A, Revision 1, "Elimination of Periodic Protection Channel Response Time Tests" Oct., 1998.
 10. WCAP-14333-P-A, Revision 1, October 1998.
 11. WCAP-15376-P-A, Revision 1, March 2003.
 12. Technical Specification Task Force, Improved Standard Technical Specifications Change Traveler, TSTF-493, "Clarify Application of Setpoint Methodology for LSSS Functions", Revision 4.

5/11/2016

Please sign, date and return the attached transmittal to indicate your receipt of this document (s). The transmittal may be sent back via the US Postal Service to:

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or

a copy may be scanned and attached to an email to MNSDCRM@DUKE-ENERGY.COM.

If you have any questions please contact Teresa Chilsen at (980) 875-5718.

Thank you in advance for your timely response.