Attachment A

TECHNICAL SPECIFICATION 3.3.2
ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION

Present Conditions of License

Table notations (2) of Table 3.3-5 (page 3/4 3-31) lists the feedwater system valves and their individual closure times that isolate the feedwater system.

Proposed Conditions of License

Table 3.3-5, Table Notations (2) would be expanded to include the feedwater bypass valves:

Valve No.	Closure Time (not including instrumentation delays)
FCV-1510	$\leq$ 5 seconds
FCV-1520	$\leq$ 5 seconds
FCV-1530	$\leq$ 5 seconds
FCV-1540	$\leq$ 5 seconds

Justification

In conformance with the Commission's desire to reduce the number of plant trips, main feedwater bypass valves were installed. The feedwater bypass valves provide additional flow control capabilities at low power levels. Additional flow control will reduce plant trips during plant startup resulting from steam generator level changes.

For consistency within the Technical Specifications, and to ensure that the bypass valves receive the same surveillance as the feedwater system valves, Table 3.3-5 should be expanded.

The addition of FCV-1510, FCV-1520, FCV-1530, and FCV-1540 has been reviewed and does not represent an unreviewed safety question as defined in 10 CFR 50.59 or a significant hazards consideration as defined in 10 CFR 50.92, as the valves will be required to isolate with the same closure time as the main feedwater valves.

The resulting revised page of Table 3.3-5 (TABLE NOTATIONS) is attached.

Attachment A

TABLE 3.3-5 (Continued)

TABLE NOTATIONS

(1) Diesel generator starting and sequence loading delays included. Response time limit includes opening of valves to establish SI path and attainment of discharge pressure for centrifugal charging pumps, SI and RHR pumps (where applicable).

(2) Feedwater system overall response time shall include verification of each individual feedwater system valve closure time as shown below:

Valve	Closure Time (not including instrumentation delays)
FCV-438	≤ 60 seconds
439	≤ 60 seconds
440	≤ 60 seconds
441	≤ 60 seconds
510	≤ 5 seconds
520	≤ 5 seconds
530	≤ 5 seconds
540	≤ 5 seconds
1510	≤ 5 seconds
1520	≤ 5 seconds
1530	≤ 5 seconds
1540	≤ 5 seconds

(3) Diesel generator starting and loading delays included.

(4) Diesel generator starting and sequence loading delays not included. Offsite power available. Response time limit includes opening of valves to establish SI path and attainment of discharge pressure for centrifugal charging pumps (where applicable).

(5) Diesel generator starting and sequence loading delays included. Response time limit includes opening of valves to establish SI path and attainment of discharge pressure for centrifugal charging pumps.

(6) The maximum response time of 48.5 seconds is the time from when the containment pressure exceeds the high-high setpoint until the spray pump is started and the discharge valve travels to the fully open position assuming off-site power is not available. The time of 48.5 seconds includes the 28-second maximum delay related to ESF loading sequence. Spray riser piping fill time is not included. The 80-second maximum spray delay time does not include the time from LOCA start to "P" signal.